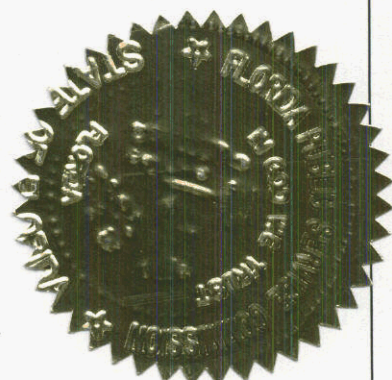


BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by ITC^DeltaCom ) DOCKET NO. 990750-TP  
Communications, Inc. d/b/a ITC^DeltaCom)  
for arbitration of certain unresolved )  
issues in interconnection negotiations )  
between ITC^DeltaCom and BellSouth )  
Telecommunications, Inc. )



VOLUME 2  
Pages 194 through 321

PROCEEDINGS: HEARING  
BEFORE: COMMISSIONER SUSAN F. CLARK  
COMMISSIONER E. LEON JACOBS, JR.  
DATE: Wednesday, October 27, 1999  
TIME: Commenced at 9:00 a.m.  
PLACE: Betty Easley Conference Center  
Room 148  
4075 Esplanade Way  
Tallahassee, Florida  
REPORTED BY: NANCY S. METZKE, RPR, CCR  
APPEARANCES:  
(As heretofore noted.)

DOCUMENT NUMBER - DATE

14072 NOV 16 99

FPSC-RECORDS/REPORTING

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

I N D E X

WITNESSES

NAME PAGE NO.

MICHAEL THOMAS

Direct Examination by Mr. Adelman	. . .	200
Prefiled Direct Testimony Inserted	. . .	204
Prefiled Rebuttal Testimony Inserted	. . .	227
Cross Examination by Mr. Alexander	. . .	251
Cross Examination by Ms. Caldwell	. . .	295
Cross Examination by Mr. Alexander	. . .	303
Redirect Examination by Mr. Adelman	. . .	311

EXHIBITS - VOLUME VI

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

NUMBER		ID.	ADMTD.
#16	Exhibits MT-1 and MT-2 . . . .	226	317
#17	Letter to Nanette Edwards dated 9/23/99 from Parkey Jordan . . . .	270	317
#18	BellSouth Change Request Form . . . .	312	320

P R O C E E D I N G S

1  
2  
3 COMMISSIONER CLARK: Let's go back on the  
4 record.

5 I'd like to do two things. Ms. Edwards, would  
6 you remind me when Mr. Wood gets on the stand that  
7 we will need to swear him in?

8 MS. EDWARDS: Okay.

9 COMMISSIONER CLARK: And I understand that  
10 there are errata sheets to depositions. What we'll  
11 do is mark that as a composite exhibit. We'll mark  
12 it as Exhibit 15, and when we have compiled all  
13 those sheets, let's copy them and hand them out. I  
14 guess the most important thing is to make sure the  
15 court reporter has them and then at that time we  
16 will move them into the record, okay? Is that how  
17 you wanted to do it?

18 MS. CALDWELL: Some will be late-filed that we  
19 will not have today.

20 COMMISSIONER CLARK: Okay.

21 MS. CALDWELL: Others we will have today.

22 COMMISSIONER CLARK: All right. We'll make 15  
23 a late-filed exhibit, and it will simply be when we  
24 get them altogether, we will --

25 MS. CALDWELL: We will forward it.

1           COMMISSIONER CLARK: We'll admit them in the  
2 record now subject to objection. I don't imagine  
3 there will be one, but if there is, let me or the  
4 prehearing officer know, okay? Errata sheets is a  
5 Late-filed Exhibit 15, and we'll admit it into the  
6 record at this time subject to objection.

7           I would also like to get some feel for time  
8 frames, and I guess it would be appropriate to ask.  
9 BellSouth, how much time do you estimate for each  
10 witness of DeltaCom? How much cross examination do  
11 you estimate?

12           MR. ALEXANDER: That's very difficult to do  
13 because you don't know about the responses you get,  
14 but I would estimate no more than a half hour for  
15 probably Mr. Thomas and half a hour probably for  
16 Mr. Wood and maybe, maybe between a half an hour to  
17 an hour for Mr. Hyde.

18           COMMISSIONER CLARK: Okay. Staff, how about  
19 you?

20           MS. CALDWELL: I think that we're along the  
21 same lines. Probably a half an hour or so for  
22 Mr. Thomas. Mr. Hyde is going to take a while, and  
23 Mr. Wood maybe half an hour or less.

24           COMMISSIONER CLARK: Okay. Let me ask  
25 ITC^DeltaCom. Do you have any estimate on cross

1 examination for BellSouth's witnesses?

2 MR. ADELMAN: I can give you very rough  
3 numbers, Commissioner. I don't anticipate we will  
4 reach them today, and what I'd like to be able to do  
5 is look through the testimony and consider what will  
6 be stricken, and that will pretty much drive the  
7 time estimates.

8 COMMISSIONER CLARK: Okay. I would appreciate  
9 that because I think -- and I particularly want to  
10 know if there are no questions for a witness. We've  
11 had that occur before where we've kept a witness  
12 here and it works out that we have no questions for  
13 them, and certainly it's probably not efficient to  
14 do it that way. I think what I propose to do is not  
15 to go too late today, but you might anticipate  
16 starting early -- I guess we can't start early  
17 tomorrow, can we? We have a breakfast.

18 COMMISSIONER JACOBS: We can start at nine if  
19 you want to.

20 COMMISSIONER CLARK: I have a meeting at nine.  
21 We'll start tomorrow at 9:30, but you can anticipate  
22 we will have a full day and possibly go late if it  
23 appears we can finish it tomorrow. All right. I  
24 see heads nodding, so we're going to go that way.

25 The next witness is Mr. Thomas; is that

1 correct?

2 MR. ADELMAN: That is correct, Your Honor.

3 COMMISSIONER CLARK: Okay.

4 MR. ADELMAN: We call Michael Thomas to the  
5 stand.

6 Mr. Thomas, you've previously been sworn,  
7 correct?

8 WITNESS THOMAS: That's correct.

9

10

11

\* \* \* \*

12

13 Whereupon,

14

MICHAEL E. THOMAS

15 was called as a witness by ITC^DeltaCom and, after being  
16 first duly sworn, was examined and testified as follows:

17

18

DIRECT EXAMINATION

19

BY MR. ADELMAN:

20

Q Can you please state your full name for the

21

record?

22

A Michael E. Thomas.

23

Q And by whom are you employed?

24

A ITC^DeltaCom.

25

Q And are you the same Michael Thomas that caused

1 to be prefiled on August 16th, 1999 in this docket 19  
2 pages of question and answer direct prefiled testimony?

3 A That's correct.

4 Q And did you have one exhibit -- excuse me, two  
5 exhibits attached to that testimony?

6 A That's correct.

7 MR. ADELMAN: Commissioner Clark, what I'd like  
8 to do at this time is spend just a moment going  
9 through the portions of Mr. Thomas's direct  
10 testimony that the parties agree, based on the  
11 Commission's previous ruling, should not be  
12 considered in this case.

13 COMMISSIONER CLARK: Go ahead.

14 BY MR. ADELMAN (Continuing):

15 Q If I could ask you to turn to Page 5 of your  
16 direct testimony, beginning at Line 4, immediately after  
17 the colon, "ability to," that first item, Number 1,  
18 "Parse Customer Service Records, (CSRs), should be  
19 deleted -- or stricken, I should say.

20 Skipping down to Line 8, the sentence beginning  
21 "By having" should be deleted, so through the word  
22 "information," which is in the middle of Line 10. Same  
23 page, at Line 15, in the sentence that begins on that  
24 line, the new sentence should read: "The production of  
25 the RSAG has already been ordered," so that the words



1 "the CSR parsing specifications and" should be deleted,  
2 and the word "have" should, I think, be changed to the  
3 word "has."

4 On Page 17 -- excuse me, on the bottom of Page  
5 5 in the question, particular on Line 24, the words "CSR"  
6 and the word "and" should be deleted. So that the  
7 sentence would read: "With the RSAG information."

8 Page 6, beginning at Line 16, through Page 7,  
9 ending at Line 4, should be struck from the record.

10 Page 12, beginning at Line 5, through Page 15  
11 at Line 2.

12 MR. ALEXANDER: David?

13 MR. ADELMAN: Yes.

14 MR. ALEXANDER: Did you on Page 6 strike the  
15 first of the sentence at Lines 12 and 13, "By  
16 requesting the CSR?"

17 MR. ADELMAN: I'm sorry, I missed that, but  
18 you're correct, Mr. Alexander.

19 COMMISSIONER JACOBS: What was that again?

20 MR. ADELMAN: It should be on Line 12, Page 6,  
21 the words "The CSR and" should be deleted. That's  
22 Line 12, Page 6, so that it should read, "By  
23 requesting RSAG information." I guess it should be  
24 "the RSAG information."

25 MR. ALEXANDER: Where were you on Page 12?

1 MR. ADELMAN: Page 12, Line 5, all the way  
2 through to Page 15, Line 2, and picking up again at  
3 Page 15 at Line 18, through Page 18, Line 8. And  
4 that does it.

5 BY MR. ADELMAN (Continuing):

6 Q Mr. Thomas, considering what's been stricken,  
7 do you have any corrections or modifications you'd like  
8 to make to what remains of your prefiled direct  
9 testimony?

10 A No, I do not.

11 Q If I asked you the questions contained in that  
12 remaining prefiled testimony today would your answers  
13 from the stand be the same?

14 A Yes, they would.

15 MR. ADELMAN: Commissioner, I'd ask that  
16 Mr. Thomas's remaining prefiled testimony be read  
17 into the record as if given orally from the stand  
18 today.

19 COMMISSIONER CLARK: It will be read in the  
20 record as though -- it will be inserted in the  
21 record as though read.

22 MR. ADELMAN: Thank you.  
23  
24  
25

Direct

0204

1 Q: PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

2 A: My name is Michael Thomas. I am Director – Information Services for  
3 ITC^DeltaCom Communications, Inc., (“ITC^DeltaCom”), and my  
4 business address is 8830 U.S. Hwy 231, Arab, Alabama 35016 .

5

6 Q: PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE AND  
7 BACKGROUND.

8 A: I hold a Bachelor of Electrical Engineering from Auburn University. My  
9 responsibilities with ITC^DeltaCom include management and oversight  
10 for all information systems resources, electronic interfaces to trading  
11 partners and the LAN/WAN infrastructure. I joined ITC^DeltaCom in  
12 1996 as Senior Manager of Information Services Development. I have  
13 held various positions in management and software development since  
14 1986.

15

16 Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?

17 A: The purpose of my testimony is to describe ITC^DeltaCom's position  
18 concerning its requirements for access to BellSouth Telecommunications,  
19 Inc.'s (“BST's”) Operational Support Systems (“OSS”) and related issues.

20

21 Q: HAVE ANY OF THE ISSUES ADDRESSED IN YOUR TESTIMONY  
22 BEEN RESOLVED?

23 A: Yes. I believe some of the issues have been resolved. Please refer to  
24 Exhibit CJR-1 in Mr. Rozycki's Testimony for a list of the issues that

1 ITC^DeltaCom believes have been resolved. I have included a  
2 discussion of these issues in my Testimony because the parties have not  
3 formalized the resolution of these issues.

4

5 Q: PLEASE DESCRIBE ITC^DELTACOM'S STATUS WITH BELLSOUTH  
6 ON DEVELOPING AND IMPLEMENTING OSS THAT SUPPORT  
7 RESALE AND UNBUNDLED NETWORK ELEMENT ("UNE") ORDERS.

8 A: ITC^DeltaCom has implemented an expensive, customized version of  
9 Electronic Data Interchange ("EDI") in order to send electronic orders for  
10 unbundled network elements and certain resale services to BellSouth.  
11 ITC^DeltaCom implemented the EDI interface based on BellSouth's  
12 affirmations that EDI is its nondiscriminatory OSS interface. As of April 1,  
13 1999, ITC^DeltaCom began sending every order that BellSouth would  
14 accept via EDI. Unfortunately, 20-25% of the orders that ITC^DeltaCom  
15 currently places via EDI are not yet accepted by BellSouth's electronic  
16 systems. For instance, EDI does not accept any loop orders that are in  
17 a hubbing area. In addition, in areas where permanent local number  
18 portability is not available, and an end-user switches to ITC^DeltaCom,  
19 ITC^DeltaCom assigns the end-user with an ITC^DeltaCom telephone  
20 number. To ensure that the customer continues to receive his or her  
21 telephone calls, an intercept message must be placed on the line.  
22 However, EDI does not allow an intercept message to initially be placed  
23 on the loop order in this scenario. Therefore, the customer may  
24 potentially not receive telephone calls. Due to this limitation in EDI,

1 ITC^DeltaCom is forced to submit such orders via facsimile. Further, of  
2 the 75-80% of ITC^DeltaCom's orders that are submitted electronically,  
3 62% of these orders fall out for manual handling by BellSouth. This  
4 means that BellSouth's electronic systems are incapable of totally  
5 processing approximately 70% of ITC^DeltaCom's orders. As stated  
6 above, ITC^DeltaCom developed EDI, the national standard interface,  
7 based on BellSouth's affirmations that EDI is its nondiscriminatory  
8 interface. To develop a new BellSouth interface at this point would be  
9 cost prohibitive and senseless. ITC^DeltaCom has spent many hours  
10 and dollars developing the national industry standard EDI interface.

11

12

### **ACCESS TO OSS**

13 Q: IS BELLSOUTH PROVIDING NONDISCRIMINATORY ACCESS TO ITS  
14 OSS?

15 A: No. BellSouth is not providing nondiscriminatory access to its OSS  
16 systems and databases. BellSouth is required by the  
17 Telecommunications Act of 1996 (the "Act"), Federal Communication  
18 Commission ("FCC") Orders, and State Commission Orders to provide  
19 nondiscriminatory access to OSS functions. Absent an integrated, fully  
20 functional EDI interface, BellSouth cannot provide nondiscriminatory  
21 access. For instance, ITC^DeltaCom needs nondiscriminatory access to  
22 the pre-ordering information necessary to submit accurate orders to  
23 BellSouth. Currently, ITC^DeltaCom uses LENS, a BellSouth proprietary  
24 interface, to access pre-ordering information. LENS, however, does not

1 allow ITC^DeltaCom to integrate pre-ordering information into  
2 ITC^DeltaCom's EDI orders. Without such integration, ITC^DeltaCom  
3 must re-enter the information from the pre-ordering interface into the EDI  
4 ordering interface, which is inefficient, prone to human error, and not at  
5 parity with the OSS systems enjoyed by BellSouth. In addressing the  
6 importance of incumbent local exchange carriers ("ILECs") providing  
7 competing carriers access to the OSS functions of an incumbent LEC,  
8 the FCC states:

9 ...if competing carriers are unable to perform the functions of pre-  
10 ordering, ordering, provisioning, maintenance and repair, and  
11 billing for network elements and resale services in substantially the  
12 same time and manner that an incumbent can for itself, competing  
13 carriers will be severely disadvantaged, if not precluded  
14 altogether, from fairly competing. Thus providing  
15 nondiscriminatory access to these support systems functions,  
16 which would include access to the information such systems  
17 contain, is vital to creating opportunities for meaningful  
18 competition.<sup>1</sup>

19 In addition, the FCC states:

20 Operations support systems and the information they contain fall  
21 squarely within the definition of 'network element' and must be  
22 unbundled upon request.<sup>2</sup>

---

<sup>1</sup> *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, First Report and Order, ¶ 518 (August 8, 1996).

<sup>2</sup> *Id.* at ¶ 516.

1 Therefore, ITC^DeltaCom requests that the Commission require  
 2 BellSouth to provide it with nondiscriminatory access to pre-ordering  
 3 information. Absent a pre-ordering interface that integrates with EDI,  
 4 ITC^DeltaCom needs the ability to: (1) parse Customer Service Records  
 5 ("CSRs"); and (2) electronically receive downloads of the Regional Street  
 6 Address Guide ("RSAG"). Customer Service Records contain such  
 7 information as the customer's name, the customer's current products and  
 8 services and the customer's address. ~~By having the ability to parse the~~  
 9 ~~CSR, ITC^DeltaCom can build the CSR information into the EDI~~  
 10 ~~order without having to rekey the information.~~ Similarly, an electronic  
 11 download of the RSAG database, which contains address and facility  
 12 availability information, will allow ITC^DeltaCom to incorporate this  
 13 information into ITC^DeltaCom's back office systems to check the validity  
 14 of the customer's address, just as BellSouth's systems use the RSAG  
 15 database to check BellSouth's orders. The production of the CSR parsing  
 16 specifications and the RSAG <sup>HAS</sup> have already been ordered by the Florida  
 17 Public Service Commission. The Florida Commission Order is attached  
 18 as Exhibit MT-1. With this information, ITC^DeltaCom will be able to  
 19 submit orders with fewer errors to BellSouth, and will further be able to  
 20 develop a more integrated process, which ultimately means efficiency  
 21 gains for both parties.

22  
 23 Q: IS BELLSOUTH REQUIRED TO PROVIDE ITC^DELTACOM WITH THE  
 24 ~~CSR AND~~ RSAG INFORMATION?

1 A: Yes. The FCC recognized that the systems and personnel deployed by  
 2 the Bell Operating Companies must be sufficient to provide access to  
 3 each of the required OSS functions. In addition, the FCC required the  
 4 Bell Operating Companies ("BOCs") to provide Competitive Local  
 5 Exchange Carriers ("CLECs") with the assistance and training that  
 6 CLECs need to use the OSS functions. This assistance included  
 7 providing CLECs with the technical specifications of the interfaces and  
 8 legacy systems, so that CLECs can modify and design their own internal  
 9 OSS to communicate with the BOC's systems.<sup>3</sup> The FCC has further  
 10 concluded that in order for BOCs to demonstrate nondiscriminatory  
 11 access to OSS functions, a BOC must "provide the same access to  
 12 competing carriers that it provides to itself."<sup>4</sup> By requesting the ~~OSP~~ and  
 13 ~~MSAG~~ <sup>MSAG</sup> information, ITC^DeltaCom is simply asking BellSouth to provide  
 14 the same access to the OSS information that BellSouth provides to itself.

16 Q: ~~IS BELL SOUTH REQUIRED TO PROVIDE ITC^DELTACOM WITH~~  
 17 ~~MSAG INFORMATION?~~

18 A: ~~Yes. As stated above, BellSouth is required to provide ITC^DeltaCom~~  
 19 ~~with the same access to OSS functions as it provides to itself, including~~  
 20 ~~access to MSAG. In fact, BellSouth provides the MSAG to~~  
 21 ~~ITC^DeltaCom today on a monthly basis. ITC^DeltaCom has requested~~

<sup>3</sup> In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Michigan, CC Docket No. 97-137, Memorandum Opinion and Order ¶ 136-137 (August 19, 1997).

<sup>4</sup> Id. at ¶ 143



1 ~~that BellSouth provide updates to the MSAG on a daily basis, because~~  
2 ~~accurate MSAG information is critical to maintaining the 911 database.~~  
3 ~~The Commission should require BellSouth to provide ITC^DeltaCom with~~  
4 ~~the MSAG and subsequent updates on a daily basis.~~

5  
6 Q: IS BELLSOUTH REQUIRED TO PROVIDE ORDERING AND  
7 PROVISIONING SERVICES THAT ARE EQUAL TO BELLSOUTH, ANY  
8 AFFILIATES, SUBSIDIARIES OR CLECS?

9 A: Yes. The Act, as well as FCC and State Commission Orders have  
10 required BellSouth to provide ordering and provisioning services to  
11 CLECs at parity with itself, and its subsidiaries and affiliates.  
12 ITC^DeltaCom believes that this requirement stands without any  
13 qualifications. Without nondiscriminatory access and parity of service,  
14 CLECs, like ITC^DeltaCom, are severely disadvantaged when competing  
15 against BellSouth. According to BellSouth, it only has to provide equal  
16 services when it is technically feasible for it to do so.

17 This essentially would allow BellSouth to pick and choose at its own  
18 discretion whether it was "technically feasible" to provide ordering and  
19 provisioning services at parity to that which it provides itself, and its  
20 affiliates and subsidiaries. Exhibit MT-2 of my testimony marked  
21 confidential and proprietary shows the resale ordering and provisioning  
22 intervals that ITC^DeltaCom has experienced for the past six months.  
23 This Exhibit clearly shows that ITC^DeltaCom has not received ordering  
24 and provisioning services that are equal to BellSouth.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

**OSS- NOTIFICATION OF CHANGES**

Q: IS BELLSOUTH'S MEDIUM OF NOTIFICATION OF REVISIONS AND CHANGES TO ORDERING GUIDES ADEQUATE?

A: No. BellSouth provides carrier notifications on its website on a weekly basis, which provide a generalized description of changes BellSouth has made to the BellSouth ordering guides. It is very difficult to discern from this notification whether a change will affect a system, a business rule or both. This makes it difficult to make the necessary modifications or receive the necessary training prior to the implementation of the change by BellSouth. For these reasons, ITC^DeltaCom, and all CLECs, need advance notice of the changes that will affect systems and business rules via e-mail or other electronic means. Such notice should allow at least 45 days for ITC^DeltaCom, and other CLECs, to receive training or make the necessary changes to their systems. Without such notification, ITC^DeltaCom will continue to expend valuable resources sorting through BellSouth's inefficient notification process. For instance, in March 1999 alone, there were 35 notifications sent by BellSouth on various topics. ITC^DeltaCom had to check all 35 notifications to determine which of these notifications affected systems and which affected business rules. This is an extremely burdensome and time-consuming process because the changes are not broken out by topic. In addition, the BellSouth web page is difficult to navigate, in that there is no central location to see what changes have been made that day. To make the change notification

1 more efficient, ITC^DeltaCom would like BellSouth to send a list of the  
2 changes or revisions electronically to CLECs via e-mail or other electronic  
3 means, such as the OSS interfaces. This notification should show the  
4 additions or changes made that day, and it should be retained on the web  
5 page for thirty days.

6  
7 Q: PLEASE PROVIDE AN EXAMPLE OF A BUSINESS RULE CHANGE  
8 THAT AFFECTED ITC^DELTACOM.

9 A: As stated above, advanced notification of changes to any OSS interface  
10 that would affect ITC^DeltaCom's use of that interface is crucial to  
11 ITC^DeltaCom's ability to operate. For example, on February 8, 1999,  
12 BellSouth made a change that affected resale orders being processed.  
13 Until that date, the BellSouth business rules required the LPIC field to be  
14 "NA" in the states of Alabama, Louisiana, Mississippi, North Carolina,  
15 South Carolina, and Tennessee, as defined by BellSouth's LEO error  
16 code #3080. However, on this date, BellSouth inexplicably began  
17 rejecting all requests that had "NA" in the LPIC field. This caused all of  
18 ITC^DeltaCom's resale orders to be rejected. ITC^DeltaCom immediately  
19 contacted BellSouth to determine what was causing the orders to be  
20 rejected. BellSouth notified ITC^DeltaCom that the orders were rejected  
21 because BellSouth had changed the business rule. The "NEW" rule  
22 required either the customer's LPIC or the word "NONE" in all states.  
23 "NA" was now an invalid entry in the LPIC field. This change required a  
24 system change to ITC^DeltaCom's back office systems which could not

1 be completed until February 12, 1999. Thus, ITC^DeltaCom was unable  
2 to place orders for four days. Needless to say, if ITC^DeltaCom had  
3 been given prior notice of this rule change, ITC^DeltaCom would have  
4 been able to allocate resources to ensure that there was no disruption to  
5 the flow of orders to BellSouth. Not only did this disrupt ITC^DeltaCom's  
6 internal ordering ability, but it affected ITC^DeltaCom's customers in  
7 every state, as their orders were delayed. This is totally unacceptable.  
8 In order to ensure that service disruption such as this does not occur, it  
9 is imperative that BellSouth be required to provide 45 days advance  
10 notice of any business rule and ordering procedure changes to  
11 ITC^DeltaCom via an electronic means.

12

13 Q: HAS ITC^DELTACOM EXPERIENCED OTHER INCIDENTS WHERE  
14 BELLSOUTH FAILED TO PROVIDE ITC^DELTACOM WITH ADVANCE  
15 NOTICE OF THE DISCONTINUANCE OR CHANGE TO ANY OSS  
16 INTERFACE?

17 A: Yes. ITC^DeltaCom has experienced other incidents where BellSouth  
18 failed to provide ITC^DeltaCom with advance notice of changes which  
19 affected ITC^DeltaCom's ability to provide service. On February 22,  
20 1999, BellSouth unilaterally made a change that affected the processing  
21 of resale orders. Prior to February 22, 1999, the IMPCON  
22 (Implementation Contact) field was an optional field, as defined by Issue  
23 7e (January issue) LEO volume 1, page 101-102. However, on February  
24 22, 1999, BellSouth began rejecting all of ITC^DeltaCom's orders due to

1 the IMPCON field not being completed. On February 24, 1999,  
2 ITC^DeltaCom spoke with BellSouth regarding this issue. Subsequent  
3 to that conversation, BellSouth granted ITC^DeltaCom an interim period  
4 of two weeks to implement the change. Nevertheless, ITC^DeltaCom  
5 experienced two days where all requests were rejected and service could  
6 not be ordered. Thus, ITC^DeltaCom was effectively put out of business  
7 for six days during the month of February.

8 In April, BellSouth again made a change which affected ITC^DeltaCom's  
9 ability to order services. On April 26, 1999, BellSouth made a change  
10 that affected the processing of resale orders. Up until April 26, 1999, the  
11 EATN (Existing Account Telephone Number) field was not allowed on Full  
12 Migration resale orders for any Account Activity, as defined in Issue 7e  
13 (January issue)<sup>5</sup> LEO volume 1, page  
14 132-133. On this date, ITC^DeltaCom began receiving order clarification  
15 notices because the EATN field was not completed. ITC^DeltaCom  
16 contacted BellSouth regarding this problem on April 28, and again  
17 received an interim period of two weeks to allow ITC^DeltaCom to  
18 implement the change. Nevertheless, until ITC^DeltaCom contacted  
19 BellSouth to determine the cause of the rejected orders, all requests were  
20 denied. Such loss of service for days at a time is detrimental to a new  
21 entrant's ability to compete. As stated above, BellSouth should be

---

<sup>5</sup> Issue 7f (March issue) of the LEO volume 1 states that Line Activity of "V" on resale requests, the EATN and ATN fields must be filled out. This note was not added until issue 7f, but it was not documented in the revisions document. The only way we could have known of the change was if we looked at each and every page of Issue 7 e and 7 f, highlighting what had changed. There are over 300 pages in LEO volume 1.

1 required to post revisions or changes in one central clearly identified  
2 location on its web page with an electronic notice e-mailed or  
3 electronically transmitted directly to the CLEC.

4

5 Q: IF BELLSOUTH DECIDES TO DISCONTINUE AN OSS INTERFACE  
6 ALL TOGETHER, SHOULD BELLSOUTH BE REQUIRED TO NOTIFY  
7 ITC^DELTACOM IN ADVANCE AND IF THE DISCONTINUANCE HAS  
8 A MATERIAL IMPACT ON ITC^DELTACOM, SHOULD THE  
9 DISCONTINUANCE DATE BE MUTUALLY AGREED UPON BY THE  
10 PARTIES?

11 A: Yes. If BellSouth decides to discontinue an OSS interface that  
12 ITC^DeltaCom is currently utilizing, BellSouth must provide at least 90  
13 days advance notice to ITC^DeltaCom. Advanced notification that allows  
14 enough time to seek alternative interfaces is essential in order to ensure  
15 that ITC^DeltaCom's ability to operate and meet its customer's needs is  
16 not jeopardized. In addition, if the move to a different OSS interface has  
17 a material impact on ITC^DeltaCom, the discontinuance date should be  
18 set by mutual agreement between the Parties, with contingency work  
19 around solutions set in place. Again, this is necessary to ensure that  
20 ITC^DeltaCom's business operations are not interrupted and customer  
21 orders and service are not impacted.

22

1 Q: SHOULD BELLSOUTH MAINTAIN ONE CURRENT AND ONE  
2 PREVIOUS VERSION OF THE REVISION OR CHANGE MADE TO  
3 OSS?

4 A: Yes. A mandated date, unilaterally set by BellSouth to migrate to  
5 interface changes, puts an undue hardship on small competitive carriers.  
6 ITC^DeltaCom does not have the resources that BellSouth has and  
7 cannot migrate to newer versions of OSS interfaces in shorter time  
8 frames than that provided to BellSouth. Essentially, BellSouth may  
9 spend months developing the next version of an interface, but may leave  
10 ITC^DeltaCom with a very short period of time to implement the new  
11 version. This could have devastating effects on ITC^DeltaCom's ability  
12 to provide services to its customers if the current version of the interface  
13 is not retained until the upgrade can be completed. By maintaining one  
14 previous version of an interface, small CLECs, like ITC^DeltaCom, can  
15 secure the resources and perform the necessary testing to complete the  
16 migration without major disruptions for ITC^DeltaCom and its customers.

17  
18 Q: SHOULD BELLSOUTH PROVIDE OSS TRAINING WHEN IT MAKES  
19 SUBSTANTIAL CHANGES OR INTRODUCES NEW INTERFACES?

20 A: Yes. The FCC has required BOCs to provide CLECs with the assistance  
21 and training that CLECs need to use the OSS functions.<sup>6</sup> This is

---

<sup>6</sup> *In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Michigan*, CC Docket No. 97-137, Memorandum Opinion and Order ¶ 136-137 (August 19, 1997).

1 important because when BellSouth makes substantial changes or  
2 introduces new interfaces, ITC^DeltaCom needs the opportunity to  
3 receive the necessary training to understand, develop and implement the  
4 new interface specifications. BellSouth provides OSS training today, and  
5 in most cases provides ITC^DeltaCom the opportunity to send a limited  
6 number of personnel for training at no charge. ITC^DeltaCom simply  
7 wants to maintain this training arrangement in the Parties' interconnection  
8 agreement.

9  
10 Q: SHOULD ITC^DELTACOM BE REQUIRED TO FOLLOW BELLSOUTH'S  
11 ORDERING GUIDES?

12 A: ITC^DeltaCom believes that both parties should follow and adhere to the  
13 ATIS and OBF business rules for the interfaces that comply with national  
14 industry standards. It is important to follow such standards in order to  
15 ensure that there are clear guidelines and documentation. Adhering to  
16 national industry standards also prevents BellSouth from making  
17 unilateral changes to the business rules, which could have a significant  
18 impact on ITC^DeltaCom. Nevertheless, with advanced notification of  
19 business rule changes which I addressed above, ITC^DeltaCom will  
20 agree to follow the BellSouth ordering guides. However, by agreeing to  
21 follow the BellSouth ordering guides, ITC^DeltaCom in no way waives the  
22 ordering and provisioning procedures set forth in Attachment 6 and the  
23 Performance Standards and Guarantees contained in Attachment 10.  
24 ITC^DeltaCom believes that the provisions set forth in Attachment 6 and



1 10 of the contract should control any conflicts which may arise due to  
2 changes BellSouth makes to its ordering guides.

3  
4 Q: SHOULD BELLSOUTH PROVIDE ALL PROVISIONING DATA AND  
5 INFORMATION THAT IS AVAILABLE ?

6 A: Yes. Where available, provisioning data and information should be  
7 provided such that ITC^DeltaCom can correctly submit orders to  
8 BellSouth. The Firm Order Confirmation ("FOC") should contain  
9 appropriate data as defined by the OBF and BellSouth's ordering guides  
10 in order for ITC^DeltaCom to track the order in its systems. At a  
11 minimum, an FOC should include the due date, purchase order number  
12 ("PON"), telephone number, local service request number, service order  
13 number, and all other data as defined by the OBF and BellSouth's  
14 Ordering Guides. Receiving this information on a FOC is essential in  
15 order to accurately track orders placed to BellSouth. The FOC serves as  
16 important order coordination and tracking tool.

17  
18 Q: ~~SHOULD BELLSOUTH PROVIDE ITC^DELTACOM WITH ELECTRONIC~~  
19 ~~NOTIFICATION OF DISCONNECTS AND WIN-BACKS?~~

20 A: ~~Yes. ITC^DeltaCom needs timely notification of disconnects and win-~~  
21 ~~backs in order to know how to accurately bill ITC^DeltaCom's customers.~~  
22 ~~If a customer leaves ITC^DeltaCom, and no notice is provided,~~  
23 ~~ITC^DeltaCom will not know to cease billing the customer. This results~~  
24 ~~in the customer being double billed for its local services. Therefore, it is~~

1 critical that ITC^DeltaCom receive accurate and timely information from  
2 BellSouth. Under the parties existing agreement, BellSouth provides  
3 ITC^DeltaCom with a report known as the OUTPLOC report. This report  
4 is transmitted electronically to ITC^DeltaCom via Connect:Direct.  
5 ITC^DeltaCom requests that the Commission require BellSouth to  
6 continue to provide the OUT PLOC report via Connect:Direct to  
7 ITC^DeltaCom in the parties' new interconnection agreement.

8  
9 Q: SHOULD BELLSOUTH PROVIDE A TELEPHONE NUMBER FOR  
10 RESOLUTION OF ISSUES RELATED TO OSS INTERFACES WITH A  
11 TRAINED STAFF TO ANSWER QUESTIONS?

12 A: Yes. The Commission should require BellSouth to provide a toll-free  
13 telephone number for resolution of issues related to OSS interfaces with  
14 trained staff to answer questions. BellSouth has developed proprietary  
15 OSS systems and controls changes to business rules. Therefore, only  
16 BellSouth, the vendor and manufacturer of that OSS interface knows  
17 whether the problem is a result of a change, error or defect on its side of  
18 the interface. Without BellSouth's assistance, ITC^DeltaCom may not be  
19 able to determine what the problem is or how to correct it, especially if a  
20 change was made to a business rule and notification was not provided to  
21 ITC^DeltaCom. Further, in most industries, manufacturers offer a toll free  
22 number to assist in identifying problems with their product. This is  
23 especially true in the software industry, where service agreements require  
24 a response to a trouble call within a specified period of time. Without the

1 ability to contact a trained individual who can identify the problem and/or  
2 take corrective action to fix the problem, ITC^DeltaCom may be unable  
3 to serve its customers.

4  
5 Q: SHOULD BELLSOUTH PROVIDE AFTER HOURS ASSISTANCE FOR  
6 OSS AND PROVISIONING ORDERS?

7 A: Yes. Currently BellSouth provides after hours assistance to its retail  
8 customers; therefore, to provide parity, BellSouth should be required to  
9 provide after hours assistance for OSS and provisioning orders to  
10 ITC^DeltaCom. As it exists today, if ITC^DeltaCom has difficulties  
11 because of an OSS related problem or a problem with the provisioning  
12 of an order, ITC^DeltaCom and its customer must wait until the UNE  
13 Center and the Local Carrier Service Center ("LCSC") are open. The  
14 LCSC's hours of operation are 8:00a.m. to 5:00p.m., and the UNE Center  
15 is open from 8:00a.m. to 5:00p.m. Central Standard Time. This severely  
16 limits the ability of ITC^DeltaCom to convert business customers to  
17 ITC^DeltaCom service after hours, which is when many customers wish  
18 to convert service. For example, when ITC^DeltaCom and BellSouth are  
19 engaged in a cutover of a customer from BellSouth to ITC^DeltaCom, the  
20 UNE Center technicians must work jointly with ITC^DeltaCom  
21 technicians. When a problem is found that needs to be corrected by the  
22 LCSC, and it is after 5:00p.m. CST, the cut has to be rescheduled to a  
23 later date. This frustrates the customer who wanted the cutover to take  
24 place after business hours, and must now make plans to reschedule the

1 cutover. To make matters worse, in some instances the customer is left  
2 without dial tone. This certainly does not foster positive customer  
3 relations, nor does it allow ITC^DeltaCom to provide the quality customer  
4 experience to which we strive to achieve. Therefore, at a minimum, the  
5 LCSC and the UNE Center should have the same extended hours of  
6 operation so customers are not caught in the middle. Thus,  
7 ITC^DeltaCom requests that the Commission require BellSouth to staff  
8 the LCSC and the UNE Center from 6 a.m. to 9 p.m., at a minimum.

#### REPAIR INTERFACE

10  
11 Q: SHOULD BELLSOUTH BE REQUIRED TO PROVIDE AN ELECTRONIC  
12 INTERFACE FOR RESALE AND UNE REPAIR ISSUES?

13 A: Yes. BellSouth should be required to provide ITC^DeltaCom with an  
14 electronic interface which provides access to BellSouth's maintenance  
15 systems and databases in order to allow ITC^DeltaCom's maintenance  
16 personnel and customer service representatives to enter a new customer  
17 trouble ticket into the BellSouth maintenance system, retrieve and track  
18 the current status of ITC^DeltaCom repair tickets with access to the  
19 estimated time to repair, initiate a technician dispatch, receive timely  
20 notification if a repair technician is unable or anticipates being unable to  
21 meet a scheduled repair, retrieve a list of itemized time and material  
22 charges at the time of ticket closure, provide test results, and  
23 electronically notify ITC^DeltaCom when the trouble is cleared. This  
24 information is required in order for ITC^DeltaCom to track the resolution

1 of its customers' troubles and to be able to inform ITC^DeltaCom  
2 customers of the status of their repair. Without this information,  
3 ITC^DeltaCom can not provide the level of service which our customers  
4 expect us to provide.

5

6 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

7 A: Yes. However, since the parties intend to continue negotiating after the  
8 submission of my testimony, I reserve the right to modify and update my  
9 testimony in response to issues raised by BellSouth.

10

1 BY MR. ADELMAN (Continuing):

2 Q Mr. Thomas, are you the same Michael Thomas  
3 that caused to be prefiled on September the 13th, 1999,  
4 17 pages of question and answer prefiled rebuttal  
5 testimony?

6 A Yes, I am.

7 Q And there were -- I believe there was a --

8 COMMISSIONER CLARK: Would you hang on just a  
9 minute? I need to deal with something.

10 MR. ADELMAN: Sure.

11 (DISCUSSION OFF THE RECORD)

12 COMMISSIONER CLARK: I'm sorry. Go ahead.

13 BY MR. ADELMAN (Continuing):

14 Q Are you the same Michael Thomas that caused to  
15 be prefiled on September the 13th, 1999, 17 pages of  
16 question and answer prefiled rebuttal testimony?

17 A Yes, I am.

18 Q And I believe there was one exhibit attached to  
19 that prefiled rebuttal testimony which you had marked as  
20 MT-3; is that correct?

21 A That's correct.

22 MR. ADELMAN: And my records indicate,  
23 Commissioner, that there was no testimony in the  
24 prefiled rebuttal testimony which would need to be  
25 stricken; is that correct?

1 MR. GOGGIN: That's not entirely correct.

2 There were some --

3 MR. ADELMAN: Oh, the -- not as a result of the  
4 issue, I'm sorry. Not as a result of the  
5 Commission's ruling, but there are some issues that  
6 have been closed.

7 MR. GOGGIN: Correct.

8 COMMISSIONER CLARK: Right.

9 MR. GOGGIN: These are all resolved issues.

10 MR. ADELMAN: And those begin on Page 3 at Line  
11 10, through Page 5 at Line 2.

12 Page 9, beginning at Line 9, through Page 10,  
13 concluding at Line 2.

14 Page 11, beginning at Line 15, through Page 13.

15 WITNESS THOMAS: 14.

16 BY MR. ADELMAN (Continuing):

17 Q Excuse me, through Page 14, Line 20.

18 Mr. Thomas, considering those portions of your  
19 testimony that you understand are not included in this  
20 record as a result of the Commission's ruling or as a  
21 result of the parties reaching a settlement on those  
22 issues, do you have any corrections or modifications  
23 you'd like to make to the remaining prefiled rebuttal  
24 testimony?

25 A No, I do not.

1 Q So if I asked you the questions contained in  
2 that prefiled rebuttal testimony today, would your  
3 answers be the same?

4 A Yes, they would.

5 MR. ADELMAN: Your Honor, I'd move that the  
6 prefiled rebuttal testimony be inserted in the  
7 record as if read.

8 COMMISSIONER JACOBS: The exhibit attached,  
9 that's for the purpose of proving up the hours of  
10 operation?

11 MR. ADELMAN: The rebuttal exhibit, you are  
12 correct, has been -- was connected to an issue which  
13 has been resolved, so we would not move for the  
14 admission of the rebuttal exhibit, which is marked  
15 as MT-3, however you want to handle it.

16 COMMISSIONER CLARK: Okay. We will insert the  
17 rebuttal testimony in the record as though read, and  
18 I understand there are now no exhibits attached to  
19 that.

20 MR. ADELMAN: To the rebuttal, that is correct,  
21 but there are two exhibits that are attached to the  
22 direct testimony, which I believe will survive the  
23 various rulings.

24 COMMISSIONER CLARK: All right and can you  
25 identify them for me?



1 MR. ADELMAN: Excuse me.

2 COMMISSIONER CLARK: Identify them for me.

3 MR. ADELMAN: They are identified as MT-1 and  
4 MT-2 in Mr. Thomas's testimony.

5 COMMISSIONER CLARK: We will mark them as  
6 Exhibit 16.

7 MR. ADELMAN: And just to note for the record,  
8 MT-2 was filed as a confidential exhibit.

9 COMMISSIONER CLARK: All right.

10 MR. ADELMAN: And I believe there was no  
11 objection to that.

12 COMMISSIONER CLARK: I have a question for you,  
13 just to make sure it is clear in the record. Do I  
14 take it that the footnotes in the testimony are also  
15 to be considered sworn testimony?

16 MR. ADELMAN: Yes.

17 COMMISSIONER CLARK: Okay.  
18  
19  
20  
21  
22  
23  
24  
25

1 Q: PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

2 A: My name is Michael Thomas. I am Director – Information Services for  
3 ITC^DeltaCom Communications, Inc., (“ITC^DeltaCom”), and my  
4 business address is 8830 U.S. Hwy 231, Arab, Alabama 35016.

5

6 Q: ARE YOU THE SAME MICHAEL THOMAS THAT FILED DIRECT  
7 TESTIMONY IN THIS PROCEEDING?

8 A: Yes, I am.

9

10 Q: WHAT IS YOUR PURPOSE IN TESTIFYING TODAY?

11 A: The purpose of my testimony is to respond to some of the arguments  
12 made by BellSouth’s witnesses in this Docket. I would also like to clarify  
13 ITC^DeltaCom’s position and provide additional information on a number  
14 of issues raised by BellSouth’s witnesses in their direct testimony.

15

16 Q: WHAT IS YOUR GENERAL REACTION TO BELLSOUTH’S  
17 TESTIMONY ON THE ISSUE YOU ADDRESS IN THIS REBUTTAL  
18 TESTIMONY?

19 A: BellSouth responded to my direct testimony in three basic ways.

20 (1) For some issues, BellSouth conceded the issue to ITC^DeltaCom.  
21 It is unfortunate that it required a formal filing to bring about a  
22 resolution of these issues.

1 (2) For some issues, BellSouth continues to cling to positions that are  
 2 contrary to and inconsistent with the requirements of the Act, FCC  
 3 orders or orders of various state regulators.

4 (3) For some issues, BellSouth does not address the issue brought  
 5 forward in ITC^DeltaCom's filing.  
 6

7 **Issue 3(b)(1): [ITC^DeltaCom Issue 2] – Pursuant to the definition**  
 8 **of parity, should BellSouth be required to provide Operational**  
 9 **Support Systems (“OSS”)?**

10

11 Q: DO YOU AGREE WITH MR. PATE THAT BELLSOUTH CURRENTLY  
 12 PROVIDES NONDISCRIMINATORY ACCESS TO ITS OPERATIONAL  
 13 SUPPORT SYSTEMS AS REQUIRED BY THE ACT AND FCC  
 14 ORDERS?

15 A: No. My understanding is that BellSouth must provide OSS to  
 16 ITC^DeltaCom in a manner that is equal to or at parity with that which  
 17 BellSouth provides to itself, as discussed in my direct testimony. In  
 18 addition, Paragraph 520 of the FCC's First Report and Order concludes  
 19 that nondiscriminatory access to OSS (i.e. the functions of pre-ordering,  
 20 *ordering, and provisioning*, maintenance and repair, and billing for  
 21 network elements and resale services) is technically feasible. <sup>1</sup>

---

<sup>1</sup> *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, CC Docket 96-98 (August 8, 1996). Paragraph 523 requires the OSS functions to be available to the CLEC as it is available to the incumbent LEC. Paragraph 525 requires that OSS functions must be made available in a nondiscriminatory manner by January 1, 1997.

1 Nondiscriminatory access means that whatever access BellSouth  
 2 provides to itself, BellSouth must provide "equally" to ITC^DeltaCom. For  
 3 example, BellSouth cannot require ITC^DeltaCom to fax orders when  
 4 BellSouth can electronically submit orders on behalf of its own retail  
 5 customers. ITC^DeltaCom is extremely concerned that BellSouth is now  
 6 indicating that it may not be technically feasible for ITC^DeltaCom to  
 7 obtain ordering and provisioning services equal to that which BellSouth  
 8 provides to itself or others.

9

**Issue 4: [ITC^DeltaCom Issue 2(a)(i)] Should BellSouth be required  
 to provide the specifications to enable ITC^DeltaCom to parse the  
 Customer Service Records (CSRs)? If so, how?**

13

14 Q: MR. PATE DISCUSSES BELLSOUTH'S ALTERNATIVES TO THE CSR  
 15 PARSING CAPABILITY ITC^DELTACOM HAS REQUESTED. PLEASE  
 16 RESPOND TO BELLSOUTH'S POSITION ON ITC^DELTACOM'S  
 17 REQUEST.

18 A: As I explained in my direct testimony, ITC^DeltaCom must be able to  
 19 parse the LENS CSR, so that ITC^DeltaCom can build the CSR  
 20 information into our EDI orders without having to rekey the information.  
 21 Mr. Pate fails to address ITC^DeltaCom's issue, but instead, argues that  
 22 BellSouth has developed another interface which will provide the CSR

1 parsing capability that will allow ITC^DeltaCom to parse CSRs "just as  
2 BellSouth parses CSRs in its own retail operations."

3 Interestingly, BellSouth ignored the fact, as stated in my direct testimony,  
4 that ITC^DeltaCom does not use the TAG interface. Should  
5 ITC^DeltaCom decide to research, develop and implement TAG, it could  
6 take 6 to 12 months, and would require ITC^DeltaCom to expend great  
7 resources. ITC^DeltaCom has simply requested specifications that  
8 BellSouth controls to be provided to ITC^DeltaCom, so that  
9 ITC^DeltaCom can do the necessary work to parse CSRs. BellSouth is  
10 in no way prejudiced by providing such information to ITC^DeltaCom.

11

12 Q: CONTRARY TO MR. PATE'S TESTIMONY, HAS BELLSOUTH  
13 PROVIDED ITC^DELTACOM WITH THE CSR PARSING  
14 SPECIFICATIONS THAT ITC^DELTACOM HAS BEEN REQUESTING?

15 A: Yes. BellSouth has provided ITC^DeltaCom with the CSR parsing  
16 specifications that ITC^DeltaCom has been requesting since an Alabama  
17 Public Service Commission OSS Workshop in December of 1997<sup>2</sup>. It is  
18 unfortunate that resolution of this issue required a formal filing, especially  
19 since paragraph 516 of the FCC's First Report and Order requires that  
20 OSS and the information they contain must be unbundled upon request.

---

<sup>2</sup> In RE: Petition for Approval of a Statement of Generally Available Terms And Conditions Pursuant to Section 252(f) of the Telecommunications Act of 1996 and Notification of Intention to File a Petition for In-region InterLATA Authority with the FCC Pursuant to Section 271 Of the Telecommunications Act of 1996. "BellSouth OSS Demonstration," Alabama Public Service Commission Docket No. 25835, pp. 397-401 (December 18, 1997).

1 Nevertheless, ITC^DeltaCom is pleased that this issue has been  
2 resolved.

3  
4 **Issue 5: [ITC^DeltaCom Issue 2(a)(i)] Should BellSouth be required**  
5 **to provide a download of the Regional Street Address Guide**  
6 **(RSAG)? If so, how?**  
7

8 Q: PLEASE EXPLAIN WHY ITC^DELTACOM NEEDS THE REGIONAL  
9 STREET ADDRESS GUIDE RATHER THAN ACCESS TO THE RSAG  
10 THROUGH LENS OR TAG AS SUGGESTED BY BELLSOUTH'S  
11 WITNESS PATE.

12 A: BellSouth claims that it is providing nondiscriminatory access to its OSS  
13 in a manner that allows ITC^DeltaCom and other CLECs to access the  
14 RSAG. That broad claim is an attempt to avoid the issue. As stated in  
15 my direct testimony, ITC^DeltaCom needs access to the address and  
16 facility availability information resident in BellSouth's RSAG. Only with  
17 such access can ITC^DeltaCom incorporate this information into its back  
18 office systems to check the validity of the customer's address and the  
19 facilities available at the customer's location.

20 ITC^DeltaCom has experienced significant problems with orders  
21 being rejected due to the customer's wrong address being keyed into the  
22 order. By incorporating the correct address information into our back  
23 office systems, ITC^DeltaCom will be able to submit accurate customer

1 address information to BellSouth. As noted in my direct testimony,  
2 BellSouth does not re-key address information into its orders, and  
3 ITC^DeltaCom should not be required to do so. Further, as discussed  
4 above, ITC^DeltaCom does not use TAG, nor should ITC^DeltaCom be  
5 required to implement yet another OSS interface just to receive  
6 "nondiscriminatory access" to the OSS information that BellSouth  
7 controls.

8

9

10

11 Q: HAS BELLSOUTH COMMITTED TO PROVIDE THE RSAG TO  
12 ITC^DELTACOM?

13 A: Yes. It is my understanding that during negotiations, BellSouth has  
14 stated that it will provide the RSAG to ITC^DeltaCom. In addition, Mr.  
15 Pate, on page 8 of his testimony, confirms that BellSouth is willing to  
16 provide the RSAG to ITC^DeltaCom. However, it is my understanding  
17 that BellSouth has not provided its proposed rates and conditions for the  
18 RSAG. ITC^DeltaCom is encouraged that BellSouth is now willing to  
19 provide the RSAG, but resolution of this issue cannot take place until  
20 ITC^DeltaCom is presented with an acceptable proposal from BellSouth  
21 regarding the specific rates, if any, and conditions.

22

1 **Issue 6: [ITC^DeltaCom Issue 2(a)(ii)] Should BellSouth be required**  
2 **to provide changes to its business rules and guidelines regarding**  
3 **resale and UNEs at least 45 days in advance of such changes being**  
4 **implemented? If so, how?**  
5

6 Q: WHAT IS YOUR UNDERSTANDING OF BELL SOUTH'S POSITION  
7 REGARDING THIS ISSUE?

8 A: BellSouth claims that it attempts to post all business rule and guideline  
9 change notifications on its website 30 days prior to the implementation of  
10 the change or rule. Further, Mr. Varner states on page 21 of his direct  
11 testimony that this is done "as a matter of courtesy." According to Mr.  
12 Varner, BellSouth has "no legal or mandated obligation" to provide  
13 notification of changes to business rules that will directly affect  
14 BellSouth's customers, such as ITC^DeltaCom. The Commission should  
15 expressly reject Mr. Varner's contentions.

16 By not providing sufficient notification, and by not being  
17 contractually obligated to do so, BellSouth is able to make changes to its  
18 business rules and guidelines at will. Such a practice has severe  
19 implications for all CLECs, including ITC^DeltaCom and creates an  
20 enormous opportunity for anticompetitive abusive practices. As a  
21 customer of BellSouth, ITC^DeltaCom must have sufficient notification of  
22 changes to business rules and guidelines in order to ensure that service  
23 to our customers is not disrupted. Otherwise, ITC^DeltaCom's business  
24 operations are jeopardized.



1 I urge the Commission to require BellSouth to provide 45 days  
2 advance notification of changes to business rules and guidelines for the  
3 reasons stated in my direct testimony and enumerated above.  
4 Specifically, ITC^DeltaCom requests that BellSouth be required to  
5 provide advance notice to designated ITC^DeltaCom personnel of  
6 changes to BellSouth business rules and guides that would affect a  
7 CLEC's operations via e-mail or facsimile, whichever is more convenient  
8 to BellSouth.

9

10 Q: DOES BELLSOUTH ALWAYS PROVIDE ADVANCE NOTICE TO  
11 BUSINESS RULE CHANGES?

12 A: No. Although Mr. Varner asserts that BellSouth does provide advance  
13 notice, ITC^DeltaCom has found instances where BellSouth does not  
14 communicate such changes.

15 Q: PLEASE PROVIDE AN EXAMPLE.

16 A: For example, on June 8, 1999, ITC^DeltaCom began receiving  
17 clarifications for orders that contained hunting. Hunting is a common  
18 feature requested by small and large business customers. Hunting allows  
19 a call to roll over to the next available line. The clarification from  
20 BellSouth stated that the rotary page did not match the hunting  
21 sequence. After investigation, we learned that the rotary page is a  
22 screen on the BellSouth proprietary system. The LEO guides do not  
23 have any documentation of such a page. Basically, BellSouth  
24 implemented a new rule without issuing documentation. This particular

1 example has been resolved with BellSouth but provides an excellent  
2 example to the Commission illustrating the problems associated with  
3 BellSouth's approach to business rule change communications. Without  
4 advance notice, orders are dropped and result in delays to the end-user.  
5 In this case, BellSouth has agreed not to implement this new rule until we  
6 have implemented the change in our system. BellSouth should be  
7 directed to take this approach in every case.

8

9 Q: BELLSOUTH'S WITNESS VARNER OPINES THAT ITC^DELTA COM'S  
10 REQUEST FOR TRAINING IS UNREASONABLE. DO YOU AGREE?

11 A: No, I do not. Mr. Varner states that ITC^DeltaCom has requested that  
12 BellSouth provide two seats and a seat for each new hire in training  
13 classes. It appears that Mr. Varner is confused. ITC^DeltaCom has  
14 never requested that a training seat be provided for each new hire.  
15 ITC^DeltaCom has simply requested that BellSouth maintain the status  
16 quo of two free seats when OSS training is needed due to a change  
17 being implemented by Bellsouth. Since this is the current policy that  
18 BellSouth and ITC^DeltaCom operate under, it is unclear why Mr. Varner  
19 views this as an "entirely unreasonable" request. I would add that  
20 ITC^DeltaCom is pleased to learn from Mr. Varner that BellSouth will  
21 offer "one free seat for each ALEC in OSS-related courses" and that  
22 BellSouth will be implementing a web based training system for certain  
23 courses in the fall. ITC^DeltaCom accepts BellSouth's compromise for  
24 providing one free training seat to ITC^DeltaCom, and respectfully

1 ~~requests that the Commission expressly acknowledge the parties~~  
2 ~~compromise for resolution of this issue.~~

3

4 **Issue 2(g) How should "order flow-through" be defined?**

5

6 Q: BELLSOUTH'S WITNESS, MR. PATE, STATES THAT IT IS NOT  
7 NECESSARY TO DEFINE "FLOW-THROUGH" IN THE PARTIES'  
8 INTERCONNECTION AGREEMENT? PLEASE COMMENT.

9 A: ITC^DeltaCom believes that order flow-through should be defined in the  
10 parties' interconnection agreement. Order flow through is one of the  
11 Performance measurements contained in Attachment 10. Put simply,  
12 without a definition, this measurement cannot be accurately recorded.

13

14

15

16

17 Q: WHAT IS YOUR UNDERSTANDING OF BELLSOUTH'S DEFINITION  
18 OF "FLOW-THROUGH"?

19 A: Apparently, BellSouth has defined order flow-through differently for  
20 CLECs than for itself. As defined by BellSouth, order flow through for  
21 BellSouth includes taking information directly from its customer, and while  
22 the customer is on-line with the BellSouth representative, inputting the  
23 information into BellSouth's ordering system. In essence, BellSouth has

1 created the entire order and completed the pre-ordering and ordering  
2 steps while the customer is on-line.

3 For CLECs, however, BellSouth defines order flow through as  
4 starting when "the complete and correct electronically-submitted LSR is  
5 sent via one of the ALEC ordering interfaces (EDI, TAG, or LENS)."  
6 Under this definition, BellSouth has ignored the pre-ordering part of this  
7 process, as Mr. Pate affirms on page 13 of his testimony. This means  
8 that BellSouth is comparing the time it takes itself to complete the pre-  
9 ordering and ordering steps verses the time it takes for a "complete and  
10 correct" electronic order submitted by ITC^DeltaCom to work its way  
11 through BellSouth's systems. By making this comparison, BellSouth  
12 cannot demonstrate through performance measures whether or not it is  
13 providing parity in order flow-through.

14

15 **Issue 25: [ITC^DeltaCom Issue 3(b)] Should ITC^DeltaCom and**  
16 **BellSouth be required to follow the ATIS/OBF business rules?**

17

18 Q: WHAT IS ITC^DELTA COM'S POSITION ON THIS ISSUE?

19 A: It is my understanding that this issue has been resolved by the parties;  
20 however, ITC^DeltaCom reserves the right to file supplemental testimony  
21 on this issue, should it be further disputed.

22

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

**Issue 26: [ITC^DeltaCom Issue 3(d)] Should BellSouth be required to provide ITC^DeltaCom access to Universal Service Order Codes ("USOCs"), Field Identifiers ("FIDs") and other information necessary to process orders in a downloadable format?**

Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

A: It is my understanding that this issue has been resolved by the parties; however, ITC^DeltaCom reserves the right to file supplemental testimony on this issue, should it be further disputed.

**Issue 27: [ITC^DeltaCom Issue 3(f)] Should BellSouth be required to maintain both the current and the next previous version of an electronic interface?**

Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

A: It is my understanding that this issue has been resolved by the parties; however, ITC^DeltaCom reserves the right to file supplemental testimony on this issue, should it be further disputed.

**Issue 28: [ITC^DeltaCom Issue 3(g)] Should ITC^DeltaCom have at least 90 days advance notice prior to BellSouth discontinuing an OSS interface?**

1 Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

2 A: It is my understanding that this issue has been resolved by the parties;  
3 however, ITC^DeltaCom reserves the right to file supplemental testimony  
4 on this issue, should it be further disputed.

5  
6 **Issue 30: [ITC^DeltaCom Issue 3(i)] Should BellSouth be required to**  
7 **maintain UNE/LCSC hours from 6 a.m. to 9 p.m.?**  
8

9 Q: MR. PATE, ON PAGE 22 OF HIS TESTIMONY, STATES THAT THE  
10 LCSC HOURS OF OPERATION ARE CURRENTLY 24 HOURS A DAY,  
11 7 DAYS A WEEK, HOWEVER, THESE HOURS WILL SOON BE  
12 CHANGED TO MONDAY THROUGH SATURDAY FROM 6:00 A.M. TO  
13 MIDNIGHT. PLEASE COMMENT.

14 A: ITC^DeltaCom is encouraged that BellSouth will operate its LCSC  
15 Monday through Saturday from 6:00 a.m. to midnight. During the parties'  
16 negotiations, BellSouth continually presented hours of operation for the  
17 LCSC from 8:00 a.m. to 5:00 p.m. A copy of BellSouth's proposed LCSC  
18 hours is attached as Exhibit MT-3. Based on Mr. Pate's affirmation that  
19 BellSouth will, at a minimum, operate its LCSC Monday through Saturday  
20 from 6:00 a.m. to midnight, ITC^DeltaCom is willing to modify Attachment  
21 6, Paragraph 4.8.1 to include these hours of operation. With this  
22 modification, ITC^DeltaCom considers this portion of the issue closed.  
23 However, with regard to the UNE Center hours of operation,

1 ITC^DeltaCom maintains that the appropriate hours of operation are from  
2 6 a.m. to 9 p.m., as stated in my direct testimony.

3  
4 **Issue 31: [ITC^DeltaCom Issue 3(j)] Should BellSouth be required to**  
5 **provide a toll free number to ITC^DeltaCom to answer questions**  
6 **concerning BellSouth's OSS proprietary interfaces from 8 a.m. to 8**  
7 **p.m.?**

8  
9 Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

10 A: It is my understanding that this issue has been resolved by the parties;  
11 however, ITC^DeltaCom reserves the right to file supplemental testimony  
12 on this issue, should it be further disputed.

13  
14 **Issue 32: [ITC^DeltaCom Issue 3(k)] What information should be**  
15 **included in the Firm Order Confirmation (FOC)?**

16  
17 Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

18 A: It is my understanding that this issue has been resolved by the parties;  
19 however, ITC^DeltaCom reserves the right to file supplemental testimony  
20 on this issue, should it be further disputed.

21

1 **Issue 34: [ITC^DeltaCom Issue 3(m)] What type of repair information**  
2 **should BellSouth be required to provide to ITC^DeltaCom such that**  
3 **ITC^DeltaCom can keep the customer informed?**  
4

5 Q: ON PAGES 24 AND 26 OF HIS TESTIMONY, MR. PATE CLAIMS THAT  
6 BELLSOUTH PROVIDES ITC^DELTACOM WITH NON-  
7 DISCRIMINATORY ACCESS TO MAINTENANCE AND REPAIR OSS.  
8 PLEASE COMMENT.

9 A: ITC^DeltaCom agrees with Mr. Pate that BellSouth's maintenance and  
10 repair interfaces must allow ITC^DeltaCom and other CLECs to enter  
11 customer trouble tickets into the BellSouth maintenance system, retrieve  
12 and track the current status of ITC^DeltaCom repair tickets, and receive  
13 an estimated time to repair on a real-time basis. However, it is critical  
14 that BellSouth also provide ITC^DeltaCom the ability to receive timely  
15 notification if a repair technician is unable or anticipates being unable to  
16 meet a scheduled repair, retrieve a list of itemized time and material  
17 charges at the time of ticket closure, provide test results, and  
18 electronically notify ITC^DeltaCom when the trouble is cleared.

19 It is my understanding that BellSouth agreed that it could provide timely  
20 notification if a repair technician is unable or anticipates being unable to  
21 meet a scheduled repair, provide test results, and notify ITC^DeltaCom  
22 when the trouble is cleared via the TAFI electronic interface. Therefore,  
23 it is unclear to me why Mr. Pate omitted these capabilities from the  
24 functions he lists in his testimony. In addition, it is also my understanding



1 that BellSouth's electronic maintenance interfaces can not currently  
2 retrieve a list of itemized time and material charges at the time of ticket  
3 closure. ITC^DeltaCom is indifferent as to whether BellSouth sends  
4 itemized time and material charges for maintenance and repair to  
5 ITC^DeltaCom via an electronic interface or some other means. The  
6 issue is that ITC^DeltaCom must receive sufficient information in order  
7 to verify the charges incurred for maintenance performed by BellSouth.  
8 This would include all time and material charges, itemized by time spent,  
9 price of materials used, procedures employed, amounts incurred in each  
10 such category, and total by customer, per event. Therefore, as stated in  
11 my direct testimony, and reiterated above, the information being  
12 requested by ITC^DeltaCom is required in order for ITC^DeltaCom to  
13 track the resolution of its customers' troubles and to be able to inform  
14 ITC^DeltaCom customers of the status of their repair. Further,  
15 ITC^DeltaCom must receive timely billing information in order to verify the  
16 charges that it incurs for maintenance performed by BellSouth. Without  
17 this information, ITC^DeltaCom can not provide the level of service which  
18 our customers expect us to provide, accurately bill our end-user and  
19 verify BellSouth's charges, nor can BellSouth claim that it is providing  
20 non-discriminatory access to maintenance information and interfaces.

21  
22 **Issue 38: [ITC^DeltaCom Issue 6(a)] What charges, if any, should**  
23 **BellSouth be permitted to impose on ITC^DeltaCom for BellSouth's**  
24 **OSS?**

1

2 Q: PLEASE CLARIFY ITC^DELTACOM'S POSITION REGARDING  
3 CHARGES FOR OSS.

4 A: ITC^DeltaCom's position on this issue is fully addressed by Mr. Wood  
5 and Mr. Rozycki. BellSouth does not provide adequate OSS ordering  
6 and provisioning to ITC^DeltaCom today and ITC^DeltaCom should not  
7 have to pay for something that BellSouth is unable to deliver. Exhibit  
8 MT-2 of my direct testimony marked confidential and proprietary shows  
9 the ordering and provisioning intervals that ITC^DeltaCom has  
10 experienced during the first six months of 1999. These intervals, which  
11 are undisputed by BellSouth, clearly show that ITC^DeltaCom is not privy  
12 to adequate OSS in the state of Florida.

13

14 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

15 A: Yes. But I must note that information provided by BellSouth through  
16 discovery may have a great impact on my testimony. For that reason, I  
17 think it is crucial that I be permitted to incorporate the impact of such  
18 information into my final presentation to the Commission.

19

1 BY MR. ADELMAN (Continuing):

2 Q Mr. Thomas, have you prepared a summary of your  
3 prefiled direct and prefiled rebuttal testimony?

4 A Yes, I have.

5 Q Can you please provide that to the Commission  
6 at this time?

7 A Yes. Good afternoon. As I stated, I'm Mike  
8 Thomas. I'm director of information services at  
9 ITC^DeltaCom. I'm responsible for the local area network  
10 and wide area network infrastructure, system and  
11 application development, and the electronic interfaces to  
12 the ILEC, including BellSouth.

13 I'm here today to talk to you about quality of  
14 service, quality of service from BellSouth to  
15 ITC^DeltaCom and eventually the consumer in Florida. My  
16 first topic today is advanced notification. We are  
17 requesting 45 days advance notification of business rule  
18 changes that affect our ability to order electronically  
19 with BellSouth.

20 Today we send our orders via EDI, or Electronic  
21 Data Interchange. And what that is is a template or  
22 boilerplate, if you will, that allows companies such as  
23 BellSouth and ITC^DeltaCom to exchange information. In  
24 addition to that boilerplate or template, are business  
25 rules that determine what data is in there. Is this

1 field required? Is the pick list on this A, B, C or  
2 things of that nature.

3           From time to time, those business rules change,  
4 on both BellSouth's and ITC^DeltaCom's Side. When they  
5 change it affects our systems. We have to go in and make  
6 changes to our systems so that we can continue to send  
7 those orders electronically. That takes time. We can't  
8 get those at the last minute and make the changes or it  
9 causes us not to be able to order electronically with  
10 BellSouth, basically puts us out of putting new customers  
11 in service. It's a customer affecting issue. We're  
12 asking for 45 days advance notification via an e-mail and  
13 via their Web site so that we can know as soon as the  
14 change is out there so we can start working on it.

15           The next issue is -- this poster was generated  
16 before it was resolved. It is resolved. My integrated  
17 OSS, what I'm referring to here is approximately two  
18 years ago BellSouth stated that EDI was their preferred  
19 nondiscriminatory ordering interface or electronic  
20 ordering interface. And with that directive, we set out  
21 to develop an EDI interface. At the time we didn't have  
22 an EDI developer or any EDI expertise. We went out,  
23 acquired the services of consultants, went to training,  
24 bought equipment, software to do this. It took us a  
25 little while to get it done, but we have the EDI

1 interface up and running. In fact, I think we were one  
2 of the first CLECs to have the L&P ordering capability  
3 via EDI, one of the first three or four. At any rate,  
4 very proud of what we've done with that, and now we're  
5 ready for the next step; and that is, to integrate  
6 preordering into our ordering capability, and what --  
7 BellSouth says, well, okay. You need to go to TAG. You  
8 need to build out to TAG, or Telecommunications Access  
9 Gateway.

10 Well, that sounds simple enough to go to TAG.  
11 It's a little more complicated. It is -- None of the  
12 expertise we gained with EDI is transferable. None of  
13 the knowledge is transferable. It's a whole new  
14 architecture. It's called Common Object Request  
15 Brokering Architecture, or CORBA.

16 Again, we're back at square one. We don't have  
17 the expertise. We are going to have either acquire  
18 consultants, employees, or whatever it takes, go to  
19 training to be build this interface; and we're going to  
20 build out to TAG. We estimate it's going to take up to  
21 12 months to do so.

22 In the interim, we've requested a couple of  
23 things; and before I go on, one of them is CSR parsing,  
24 and it's a closed issue. It's up there, but this is --  
25 I'm not going to address that, but I'm going to address

1 TAG. I was shocked to learn just last week in our  
2 research on the building out to TAG that TAG does not  
3 sparse the CSR. That's contrary to what's been said in  
4 these testimonies and I am just in disbelief that -- In  
5 fact, I have a formal change request to BellSouth from  
6 AT&T that is for this capability in TAG, and BellSouth's  
7 comments here are they're not going to be in the next  
8 release either. Still won't parse the CSR. That is the  
9 most fundamental thing in preordering there is, is being  
10 able to pull a customer record and use that information  
11 to put in an order. That is it. That's the building  
12 blocks of preordering, and it's not there.

13 MR. ALEXANDER: Commissioner Clark, I would  
14 like to object to this. This is not in his  
15 testimony. This issue is not in this proceeding,  
16 and I would ask that those comments regarding  
17 parsing the CSR be struck from the record.

18 COMMISSIONER CLARK: Mr. Adelman.

19 MR. ADELMAN: Your Honor -- Commissioner,  
20 certainly the issue of the integration of  
21 preordering an ordering is in the proceeding, and  
22 you'll hear testimony from Mr. Pate for BellSouth  
23 who will argue that TAG is the nondiscriminatory  
24 interface which is --

25 COMMISSIONER CLARK: Let me interrupt you. The

1 question is: Is it part of his prefiled testimony?

2 MR. ADELMAN: The issue of whether TAG is the  
3 integrated preordering and ordering interface is in  
4 his testimony, yes. This development from next week  
5 is not. It is not.

6 COMMISSIONER CLARK: Okay.

7 MR. ADELMAN: From last week, I'm sorry.

8 COMMISSIONER CLARK: He needs to keep his  
9 summary rooted in the testimony he has filed.

10 MR. ALEXANDER: Your Honor, may we have that  
11 struck from the record?

12 COMMISSIONER CLARK: Yes, I will strike that  
13 from the record.

14 MR. ADELMAN: If I could direct the witness.

15 BY MR. ADELMAN (Continuing):

16 Q If you could just go on to the next issue in  
17 your summary.

18 A What about RSAG?

19 Q That's in your prefiled testimony. You may  
20 discuss that.

21 A Okay. So we also asked for the download of the  
22 RSAG. That is -- the RSAG is the Regional Street and  
23 Address Guide. It has a data base of addresses and  
24 facilities available at those such addresses, that we can  
25 validate our customers' addresses and so that we don't

1 have invalid -- have errors in our orders, is basically  
2 what that's for. BellSouth has agreed to provide that  
3 download of the RSAG and subsequent updates. What we're  
4 asking the Commission to decide is a fair way of allowing  
5 BellSouth to recoup their cost of developing the  
6 download, not necessarily the data itself, but for  
7 developing the capability of having that download. We're  
8 asking that that be prorated across all CLECs that  
9 request that capability.

10 My next issue is the definition of  
11 flow-through. ITC^DeltaCom wants the definition of the  
12 flow-through in our contract. BellSouth -- it's my  
13 understanding that BellSouth does not. When I say  
14 flow-through, BellSouth measures flow-through for itself.  
15 It's the time the customer representative has the  
16 customer on the line, starts keying the order, until the  
17 time the customer is in service; but they define that  
18 differently for the CLECs or the ALECs. They define that  
19 as from the time an accurate and complete LSR is  
20 submitted through their electronic gateway, ignoring the  
21 preordering piece. The preordering piece is a  
22 substantial amount of the time for CLECs, and we believe  
23 that those definitions should be consistent, and they  
24 should be in the agreement.

25 My next issue is maintenance and repair.



1 ITC^DeltaCom is requesting that BellSouth provide us with  
2 the ability to enter trouble tickets for customer  
3 troubles, be able to track the status of that, estimated  
4 time to repair, issues such as that that they're  
5 providing today via TAFI, which is a system -- a  
6 BellSouth system. In addition to this, we're asking for  
7 time and material information; and what I mean by that is  
8 the labor involved to resolve a trouble, for the  
9 technician to go out, and the parts, any parts that they  
10 may use. This is information that they have, I would  
11 assume they have, to be able to track their technicians  
12 and the parts that are taken -- they're taking to resolve  
13 these troubles. We're asking that information be  
14 provided to us. I understand that it is not available  
15 via TAFI, and we're certainly willing to accept via  
16 another electronic means.

17           So in summary, my issues are: 45 days advanced  
18 notification of business rule changes; the RSAG download  
19 to be able to find a fair way to allow BellSouth to  
20 recoup the cost of developing the download, and share  
21 that cost across CLECs; definition of flow-through in the  
22 contract, and consistent; and the maintenance and repair,  
23 time and material information be included in the  
24 contract. That concludes my summary.

25           MR. ADELMAN: Thank you Commissioner. We'd

1 tender Mr. Thomas for cross examination.

2 COMMISSIONER CLARK: Mr. Alexander.

3 MR. ALEXANDER: Thank you, Commissioner Clark.

4 CROSS EXAMINATION

5 BY MR. ALEXANDER:

6 Q Good afternoon, Mr. Thomas.

7 A Good afternoon.

8 Q Let's take the RSAG download issue first.

9 That's Issue 5 in this proceeding, is it not?

10 A Subject to check, I believe so.

11 Q Now the RSAG stands for the Regional Street  
12 Address Guide; is that right?

13 A That's my understanding, yes.

14 Q And is it your understanding that that is used  
15 to perform address validation; is that correct?

16 A It's my understanding it's a data base with  
17 addresses in a capability that can be written to -- pull  
18 addresses and validate it. I don't think RSAG itself  
19 provides that capability. It's just data.

20 Q Maybe I didn't say it correctly. I apologize.  
21 But the information in RSAG can be used to perform  
22 address validation?

23 A That's correct.

24 Q And is that why DeltaCom would like to have  
25 access to that database?

1           A     That's correct.

2           Q     Okay.  When DeltaCom places an order today, it  
3 validates addresses by accessing the RSAG data base  
4 through LENS interface; is that correct?

5           A     Yes, we use LENS for preordering today.

6           Q     Okay.  And the issue that we have here is  
7 really that DeltaCom has indicated it's going to move to  
8 the TAG, the Telecommunications Access Gateway, T-A-G  
9 interface, but you're wanting something in the interim  
10 until you do, between using LENS and going to TAG; is  
11 that correct?

12          A     Yeah, we're looking to be able to validate our  
13 addresses now.  Like I said, we're in the process of  
14 developing out to TAG, and I have reason for concern  
15 about the capabilities of TAG; and we certainly need  
16 something that will allow us to address, validate  
17 addresses.  And right now, the only thing we can think of  
18 at this point, or the most logical thing for us at this  
19 point, is a download of the RSAG.

20          Q     And you indicated, I believe, in your summary  
21 that you've estimated -- well, am I correct that you are  
22 moving to TAG?

23          A     Yes, we are.

24          Q     And you indicated in your summary, I believe,  
25 that you anticipate that implementation effort to take 6

1 to 12 months?

2 A That's our estimation, yes.

3 Q Okay. How long have you been looking at  
4 implementing TAG?

5 A We've, like I said, we've been built out to  
6 EDI. That's what we've been concentrating on. We're a  
7 small company. We've got a very robust, as far as the  
8 CLEC side, capability with EDI. For what BellSouth will  
9 accept, we send via EDI.

10 That was no small undertaking for us. I think  
11 the characterization here is that we may have been  
12 dragging our feet a little bit on building out to TAG,  
13 and that's not the case. We're very diligent in our  
14 efforts to integrate, and it is now the next logical step  
15 for us to build out to TAG, and we are now -- we now have  
16 that effort underway.

17 Q Okay. I guess I'm trying to ascertain, how  
18 much of the 6 to 12 months have you already used of this  
19 development time?

20 A Development has not started yet. We are doing  
21 research as I -- well, that got stricken. But we are  
22 researching and laying the groundwork.

23 COMMISSIONER CLARK: Let me be clear. It was  
24 stricken because it was not rooted in your prefiled  
25 testimony. Now that he's asked the question and has

1 opened it up, you may respond beyond what's in your  
2 prefiled testimony.

3 MR. ALEXANDER: Well, Commissioner Clark, the  
4 area that he's about to go into I've asked nothing  
5 about.

6 MR. ADELMAN: I believe he asked about the  
7 capability of TAG. Maybe the question --

8 MR. ALEXANDER: I didn't ask about the  
9 capability of TAG. I asked him how far is he in the  
10 12-month -- 6- to 12-month process. I asked for a  
11 time frame.

12 COMMISSIONER CLARK: All right. Be responsive  
13 to the question.

14 WITNESS THOMAS: Okay, we are -- you asked if  
15 that's part of the development time frame. It is  
16 not part -- We have not started developing. We are  
17 weighing our option on whether we develop that from  
18 scratch, whether we hire that done, or whether we  
19 buy a product that provides an ILEC gateway  
20 solution. So, no, the clock -- the clock has  
21 probably not started ticking just yet.

22 BY MR. ALEXANDER (Continuing):

23 Q That's my question. So we are still looking at  
24 a 6- to 12-month window for you?

25 A That's correct.

1 Q Okay.

2 COMMISSIONER CLARK: While I've interrupted  
3 you, I want to -- will somebody tell me in the  
4 prehearing order where the parties take a position  
5 on the definition of flow-through? Is it -- I mean  
6 you have a --

7 MR. ALEXANDER: It's Issue 22.

8 COMMISSIONER CLARK: Oh, it's 22. That helps.

9 MR. ALEXANDER: I'll ask him some questions  
10 about it.

11 COMMISSIONER CLARK: Well, we probably should  
12 indicate on Page 10, Line 4, that it's Issue 22, not  
13 2(g), in his rebuttal testimony.

14 MR. ALEXANDER: I believe -- Yes, it should be  
15 Issue 22. What he's used is the issue from the  
16 petition.

17 COMMISSIONER CLARK: I see. Thank you.

18 MR. ALEXANDER: They were renumbered.

19 COMMISSIONER CLARK: And it is correct, and it  
20 shouldn't -- Probably clarified it right now.

21 MR. ADELMAN: It's Petition Issue 2(g);  
22 Florida's Issue List, Issue 22.

23 COMMISSIONER CLARK: All right. Thanks.

24 MR. ALEXANDER: You're welcome.

25 BY MR. ALEXANDER (Continuing):

1           Q     Mr. Thomas, I guess, just from a global  
2 concept, I understand DeltaCom is, in your words, a small  
3 company and has undertaken a number of efforts to get  
4 into the local market. Would you agree that these  
5 interfaces that BellSouth has developed and that DeltaCom  
6 is developing so that it can use those are evolving as  
7 both the ALECs and the incumbent carriers are learning  
8 how to do this local competition process, that the  
9 industry is actually evolving standards?

10          A     Yeah, I think the industry is evolving  
11 standards. I think these OSSs, I hope they're evolving  
12 because they're right now not providing what we need. So  
13 it is my, certainly my hope -- To answer your question,  
14 yes, the standards are evolving; and it's my hope that  
15 these OSS systems provided -- or access to these OSS  
16 systems provided by BellSouth are evolving as well.

17          Q     So you are not only hoping, but you expect  
18 BellSouth to continue to improve those interfaces, and  
19 DeltaCom, consequently, will have to make changes on its  
20 side in order to use those interfaces?

21          A     I guess -- I can only say that I hope that they  
22 do.

23          Q     Well, you would expect that because you're  
24 saying that they can be improved?

25          A     I think it can be improved.

1           Q     Okay.  So when you made the statement that  
2 approximately two years ago BellSouth said that EDI, the  
3 Electronic Data Interchange interface was its preferred  
4 ALEC interface, you knew that BellSouth knew that those  
5 were going to be evolving and that was not a static  
6 electronic interface?

7           A     I don't think I stated that I took exception to  
8 EDI evolving.  Now we have to go to yet another  
9 architecture called CORBA for the preordering piece, if  
10 that was your question.

11          Q     Is that --  Well, I'm just asking, that  
12 BellSouth is holding itself out as, here is an interface  
13 we have to date, but you do recognize that there will be  
14 changes and modifications and improvements made to those  
15 interfaces as the industry, for example, continues to  
16 develop standards?

17          A     That's the way the software industry works;  
18 it's ever evolving.

19          Q     And if you're Microsoft you get to do it about  
20 every year or so?

21          A     That's correct.

22                COMMISSIONER JACOBS:  It's my understanding  
23 that there is an industry group that's working on a  
24 set of standards.  Does that cover, or does it  
25 encompass the specifications for these electronic



1 interfaces for interconnection?

2 WITNESS THOMAS: I guess -- I'm assuming you're  
3 referring to the OBF, the Ordering and Billing Forum  
4 and ATIS.

5 COMMISSIONER JACOBS: Electronic communications  
6 -- I'm sorry, it was in one of --

7 WITNESS THOMAS: The electronic interface  
8 change control process?

9 COMMISSIONER JACOBS: Yes.

10 WITNESS THOMAS: Yes, that's where the change  
11 requests I referred to earlier evolved from.

12 COMMISSIONER JACOBS: That's where that --

13 WITNESS THOMAS: That's a BellSouth committee,  
14 BellSouth and CLEC committee that addresses OSS  
15 enhancements and changes.

16 COMMISSIONER JACOBS: Is -- now -- Allow me a  
17 moment just to delve into this.

18 WITNESS THOMAS: Certainly.

19 COMMISSIONER JACOBS: How does that work in  
20 context to your evolution of EDI or any other  
21 interface that might be out there? Is it going to  
22 come out of that process and then you adopt it,  
23 basically, so that there will be some consistency,  
24 or is it basically you respond ad hoc to what  
25 BellSouth institutes in terms of modifying its

1 systems?

2 WITNESS THOMAS: That was an issue, in fact, in  
3 this arbitration, and it was settled. We agreed,  
4 we -- Both parties agreed to accept what came out  
5 of the EICCP --

6 COMMISSIONER JACOBS: I see.

7 WITNESS THOMAS: -- as the standard and what  
8 both parties would develop to. So, yes, is the  
9 answer to your question, I believe.

10 COMMISSIONER JACOBS: And then one other  
11 question. It's my understanding that TAG requires  
12 you to begin wholesale anew in development of your  
13 interface. There are no overlapping features  
14 between it and EDI?

15 WITNESS THOMAS: It is on a completely  
16 different architecture, that's correct. TAG does  
17 address ordering, so we'll have to make the choice,  
18 do we stay with our EDI ordering, which is a batch  
19 process. What I mean by that is periodically  
20 every -- and this may not be accurate, but I'm --  
21 For example, I'll say every 15 minutes BellSouth  
22 picks up these orders that have been sent EDI and  
23 starts processing them. So it is a batch process,  
24 and what they have on their side is real time.

25 COMMISSIONER JACOBS: I see.

1           WITNESS THOMAS: So there is some discrepancy  
2           there in the time and manner in which that service  
3           is delivered, which being the time -- it being a  
4           batch process.

5           COMMISSIONER JACOBS: Okay. Thank you.

6 BY MR. ALEXANDER (Continuing):

7           Q     Just to follow up on one of the questions  
8           Commissioner Jacobs asked you. There is a -- BellSouth  
9           accepts input from ALECs, such as DeltaCom, right, about  
10          these systems, its OSS developments?

11          A     In the EICCP, yes, that's correct.

12          Q     The Change Control Process Committee that  
13          you're referring?

14          A     I'm sorry?

15          Q     The Change Control Process Committee?

16          A     Yes, that's correct.

17          Q     Is DeltaCom a participant in that group?

18          A     Yes, we are.

19          Q     So DeltaCom has input about how these  
20          interfaces are developed; is that right?

21          A     We have input in that committee, yes, and they  
22          take those suggestions. Now the timing for  
23          implementation is up to BellSouth, but they do take the  
24          suggestions.

25          Q     Okay. Mr. Thomas, the issue on this download

1 of the RSAG database, right now it's not that DeltaCom  
2 just wants access to this database, because it's going to  
3 be able to get that through TAG at a later point when you  
4 actually develop it, but you're wanting an electronic  
5 download of some portion of the RSAG; is that correct?

6 A I'll address the first part. You said that  
7 that capability is available via TAG. I can say that  
8 BellSouth says it is, and we haven't seen that in our --  
9 we haven't gotten that far in our research yet. So  
10 assuming that's correct, TAG will provide access to the  
11 RSAG. To what level I'm not sure yet. So we are  
12 requesting a download of the RSAG so that we can validate  
13 addresses.

14 Q Okay. And I believe you testified that you  
15 want to validate that for your own -- for DeltaCom's back  
16 office system to do those address validations; is that  
17 right?

18 A Yeah, we'll download that to our systems and  
19 write the software to check addresses on that data in our  
20 system.

21 Q And if BellSouth is accurate, that you'll be  
22 able to access the RSAG database, you won't have any  
23 problems with rekeying information, will you, as you  
24 claim you have now using EDI?

25 A I didn't hear -- could you repeat that? I

1 didn't hear the first part.

2 Q If you can access the database, the RSAG  
3 database through TAG, will you have any issues that  
4 you've raised in your testimony concerning rekeying  
5 information?

6 A That's certainly the hope. We hope that TAG --  
7 being able to validate addresses via TAG, that we won't  
8 have to rekey that information, that's correct.

9 Q And is it your understanding that TAG has been  
10 available since, I believe -- and hopefully you can keep  
11 me straight on this, if you've been researching it, but I  
12 believe August of 1998?

13 A That's correct.

14 Q So TAG --

15 A August of '98 for the preordering piece only.

16 Q And what about the ordering piece?

17 A November of 1998.

18 Q November of 1998. So almost over -- I'm  
19 sorry.

20 COMMISSIONER JACOBS: Go ahead and finish your  
21 question.

22 Q Over a year for the preordering piece and  
23 almost a year for the ordering function?

24 A And like I said before, we were building out  
25 the EDI, the interface you said was the nondiscriminatory

1 interface of choice in 1997. These are complicated  
2 interfaces. They're not some -- it's not flipping a  
3 switch to implement these interfaces as he's trying to  
4 imply there. This is complicated. And we built out to  
5 EDI, and we immediately go to the next step.

6 COMMISSIONER JACOBS: Kind of takes me to my  
7 question. It's my understanding that your need for  
8 the address, and you take your order, you put in an  
9 address, or actually you verify an address by  
10 looking into the database at the time you take your  
11 order; is that correct?

12 WITNESS THOMAS: The way we envision that  
13 working is when we key in an address and the  
14 screen -- you're on the picture of the customer  
15 service representative keying an order, and they  
16 type the address of the customer in, or, hopefully,  
17 it pulls in from the CSR.

18 COMMISSIONER JACOBS: CSR, okay.

19 WITNESS THOMAS: But anyway, the address is up  
20 there when they go to the next thing or when they  
21 click next screen or whatever it is that they do.  
22 If something is wrong with the format of that  
23 address that's going to cause that order to be  
24 rejected when it goes to BellSouth, we  
25 automatically, in the background, check that and

1 bring them back and say, no, this is wrong.

2 COMMISSIONER JACOBS: That's the problem you're  
3 trying to avoid. That's my question I'm getting at.  
4 The problem you're trying to avoid is a later kick  
5 out from BellSouth because of some inadvertent  
6 mistype or some missing formatting that might be in  
7 the address field.

8 WITNESS THOMAS: Yeah, and let me elaborate on  
9 that a little bit. That's correct. And if, for  
10 instance, there were three errors in that, we would  
11 send that order to BellSouth, and it would kick it  
12 back and say you've got an error. We would correct  
13 the error that it said that we had. We would send  
14 it back again, and it would give us yet the second  
15 error. And then we would send it again, and it  
16 would come back again with a third error, so that  
17 can -- That's days.

18 COMMISSIONER JACOBS: Now if -- You don't need  
19 to grab that address, put it on your order record  
20 and then send it to BellSouth, all you need to do  
21 is, at the time you take the order, confirm that  
22 that's the correct address, and then when it --

23 WITNESS THOMAS: I'm sorry. I didn't hear you.

24 COMMISSIONER JACOBS: I'm trying to make sure I  
25 understand the terminology. When you say a

1 download, are you saying that you need to actually  
2 grab the address off of the database at the time you  
3 take the order, put it into your ordering  
4 information that you later send to BellSouth; and so  
5 then, theoretically, when it gets to BellSouth, it  
6 will be simply a copy of what they have in their  
7 database that they check off on? Is that what  
8 you're anticipating.

9 WITNESS THOMAS: It would have been validated  
10 against a copy that they had.

11 COMMISSIONER JACOBS: Originally.

12 WITNESS THOMAS: Yes.

13 COMMISSIONER JACOBS: Okay. And so you would  
14 have entered into it, but it would have been  
15 validated at the time you took the input, and so  
16 that's why it would clear later on down the process.

17 WITNESS THOMAS: That's correct. It's to  
18 prevent errors downstream and long provisioning  
19 intervals for our customers.

20 COMMISSIONER JACOBS: Okay. Thank you.

21 BY MR. ALEXANDER (Continuing):

22 Q Let me just try to focus back on -- You can --  
23 The question we have before this Commission is BellSouth  
24 and DeltaCom -- BellSouth has committed and offered to  
25 provide DeltaCom with a download of the RSAG and has



1 committed and offered to provide DeltaCom with a monthly  
2 update for that RSAG database; is that correct?

3 A That's correct.

4 Q And what we're really talking about here is  
5 DeltaCom has got to tell BellSouth what portion of that  
6 database it wants; is that correct?

7 A That's not my understanding. The issue  
8 outstanding, that I understand, is: What cost is  
9 BellSouth allowed to recoup for producing the download of  
10 this database?

11 Q Mr. Thomas, have you seen the correspondence  
12 back and forth during the negotiations between the  
13 parties on this issue?

14 A I have seen in Louisiana, I believe it was, the  
15 copy of the -- what BellSouth offered to provide this,  
16 the cost. It was basically a paragraph saying we'll  
17 provide this for X amount of dollars.

18 Q Have you been in discussions with BellSouth  
19 subject-matter experts regarding the download of the RSAG  
20 database?

21 A I have not. I have got a copy of the schema of  
22 that database, and I'm reviewing that now. It's on my  
23 desk. So I'm going -- reviewing that to see what it's  
24 going to take to populate that into our back-end systems.

25 Q Do you understand that as a part of determining

1 the actual price -- BellSouth has made an estimate, the  
2 best it could, but determining as a part of the actual  
3 price, that it has to know exactly what part of that  
4 database DeltaCom desires?

5 A I would assume that they would give us the  
6 whole database since that's what they have access to.

7 Q And do you realize that a whole database is  
8 literally millions and millions of bits of data?

9 A Millions and millions of bytes of data is,  
10 nowadays is not that big an issue. We collect millions  
11 and millions of call records everyday and store those in  
12 databases. That's --

13 Q Well, for BellSouth's perspective, this is even  
14 a large database; would you accept that?

15 A I accept that it's large, yes.

16 Q BellSouth is committed to provide this -- TAG  
17 is available to you, correct?

18 A Yes.

19 Q Okay. And BellSouth has committed, at  
20 DeltaCom's request, has offered to provide a download of  
21 the RSAG database and has even offered to provide  
22 monthly updates; is that right?

23 MR. ADELMAN: Objection. That's been asked and  
24 answered. That's the third time. The answer is  
25 yes.

1 MR. ALEXANDER: Well, every time I ask my  
2 question, I get back a different response, but  
3 that's all right.

4 BY MR. ALEXANDER (Continuing):

5 Q Is that correct, Mr. Thomas?

6 MR. ADELMAN: I objected to the question. I  
7 don't know if he responded to my objection or not.

8 COMMISSIONER CLARK: Go ahead and answer it one  
9 more time, but that's it.

10 WITNESS THOMAS: Yes.

11 BY MR. ALEXANDER (Continuing):

12 Q Okay. Now have you not seen the correspondence  
13 between BellSouth and DeltaCom regarding the needs it has  
14 to give you an accurate price description?

15 A I think I told you what correspondence I saw,  
16 which was the price that BellSouth was asking for the  
17 download. And if you're -- maybe I'm just not  
18 understanding your question, but that's what I've seen.

19 Q Have you seen a letter from BellSouth's counsel  
20 for the negotiation team dated September 23rd regarding  
21 the download of the RSAG?

22 A I don't know. Maybe you can show it to me.

23 MR. ADELMAN: Your Honor, if I could have a  
24 look.

25 (DOCUMENT TENDERED TO MR. ADELMAN)

1 MR. ALEXANDER: May I show it to the witness?

2 COMMISSIONER CLARK: Uh-huh.

3 BY MR. ALEXANDER (Continuing):

4 Q Mr. Thomas, take a look at -- what I've handed  
5 you is a letter from Parkey Jordan at BellSouth to  
6 Nanette Edwards dated September 23, 1999. Do you see  
7 that?

8 A Yes, I do.

9 Q Have you seen this letter before?

10 A I think this is the one that the counsel showed  
11 me in Louisiana. I have not read it in detail. I was on  
12 the stand at that time and just --

13 Q Have you read it since?

14 A No, I have not.

15 Q Has Ms. Edwards ever provided you with this  
16 letter?

17 A No, I don't believe so, but let me say this:  
18 I provide the technical -- at DeltaCom I'll provide the  
19 technical information: Can we accept this download? Will  
20 this work? The technical specifications. It's up to our  
21 regulatory department, Ms. Edwards and Mr. Rozycki, to  
22 determine a price and do the negotiations with  
23 BellSouth. I'm not involved everyday with that. I was  
24 involved a little bit with the negotiations on our  
25 interconnection agreement but just to address technical

1 issues. So I have seen this and, again, our regulatory  
2 department would have to decide if we wanted to proceed  
3 with an agreement.

4 Q Okay.

5 COMMISSIONER CLARK: Mr. Alexander, did you  
6 want this marked as an exhibit?

7 MR. ALEXANDER: Yes, I would. Cross  
8 examination exhibit for BellSouth.

9 COMMISSIONER CLARK: Okay.

10 WITNESS THOMAS: I, I -- I'm sorry.

11 COMMISSIONER CLARK: We will mark as Exhibit 17  
12 a letter to Ms. Nanette Edwards dated September  
13 23rd, 1999 from Parkey Jordan.

14 WITNESS THOMAS: I will say that I have heard  
15 of another proposal to MCI, I believe it was, for  
16 yet a different price than this.

17 BY MR. ALEXANDER (Continuing):

18 Q Who did you hear that from, Mr. Thomas?

19 A I heard that from Ms. Edwards.

20 Q Okay.

21 A I believe that -- I believe that came from her  
22 conversations with MCI.

23 Q Okay. Mr. Thomas, looking at Exhibit 17, the  
24 September 23rd, 1999 letter, does that letter, in the  
25 very first paragraph, reflect that the parties have been

1 discussing this very matter and that BellSouth agreed to  
2 provide DeltaCom with a download of the RSAG, including  
3 monthly updates as early as August 13th, 1999?

4 MR. ADELMAN: Your Honor, I object. If he's  
5 asking him to read the letter, so be it. He's not  
6 the author of the letter. He wasn't the recipient  
7 of the letter. He's only seen it one time. It's  
8 been marked as an exhibit. I guess, you know, my  
9 objection to his question is that this letter hasn't  
10 been authenticated. To the extent they're trying to  
11 read passages from the letter in, it's hearsay  
12 evidence. I don't know if Ms. Jordan will be here  
13 today or not.

14 MR. ALEXANDER: Ms. Edwards is here today.

15 MR. ADELMAN: Ms. Edwards is counsel today.  
16 She's certainly not on the stand, and the letter is  
17 addressed to Ms. Edwards, but she's certainly not  
18 the author.

19 MR. ALEXANDER: It's business correspondence  
20 between two parties in this proceeding, and this  
21 witness has seen this letter before; and, granted,  
22 it's not addressed to him, but I'm just asking him  
23 questions about the parties' negotiations which he  
24 said he participated in some of it. It's clearly  
25 correspondence between the two parties on this very

1 issue.

2 COMMISSIONER CLARK: Mr. Adelman, tell me the  
3 basis of your objection again.

4 MR. ADELMAN: It's hearsay evidence. He's  
5 asking for hearsay evidence. If he's asking him to  
6 read the letter, just to read it, I have no  
7 objection; but if the intention is to present  
8 statements made in this letter as truth of the  
9 matter asserted in the letter, it's hearsay  
10 evidence. And it's not a business record; it's  
11 correspondence.

12 MR. ALEXANDER: I would disagree. First of  
13 all, the hearsay objection in a regulatory  
14 proceeding is, you know, rarely, if ever, made, let  
15 alone sustained.

16 COMMISSIONER CLARK: Let me ask you this  
17 question. This is not being presented for the truth  
18 of the assertions made in it, it's only that this  
19 offer was made and it was received?

20 MR. ALEXANDER: Yes.

21 COMMISSIONER CLARK: Okay. I'm going to allow  
22 him to continue questioning.

23 BY MR. ALEXANDER (Continuing)

24 Q Mr. Thomas, do you want me to repeat it?

25 A Please.

1 Q Okay. I was just asking if Exhibit 17 reflects  
2 that DeltaCom and BellSouth had negotiations in a meeting  
3 on August 13th, 1999 in which BellSouth offered and  
4 actually agreed to provide DeltaCom with the download of  
5 the RSAG database and monthly updates?

6 A Yeah, I mean that's what it says here. The  
7 issue is --

8 Q Mr. Thomas?

9 A I said yes.

10 MR. ADELMAN: If the witness could answer  
11 the -- or explain his answer, I believe that's fair?

12 WITNESS THOMAS: The issue is, we've accepted  
13 their offer to download the RSAG and the subsequent  
14 monthly updates. What we don't -- what we can't  
15 agree on is how this can be -- they can be fairly  
16 paid, once, to develop the capability -- to develop  
17 the capability to download, not for the data itself,  
18 but for the capability of the download. We believe  
19 they should be compensated. We don't believe they  
20 should be compensated by everybody more than once.  
21 That's all.

22 BY MR. ALEXANDER (Continuing):

23 Q Okay. Well, you said that in your summary as  
24 well. I believe you said that DeltaCom is asking that  
25 the development cost of providing the download of RSAG be



1 prorated across all ALECs who request access to this  
2 database, the RSAG database. Is that a fair recitation  
3 of what you said earlier?

4 A I believe so, yes.

5 Q Okay. And to your knowledge, is BellSouth  
6 opposed to allowing DeltaCom to the find another ALEC who  
7 desires this database to participate in the cost of the  
8 development of that?

9 A I don't know. I can't speak for BellSouth, if  
10 they're opposed or not to that. To my knowledge, I don't  
11 know.

12 Q Have you been an active participant in these  
13 negotiations on this issue, Mr. Thomas?

14 A I was there for a few hours.

15 COMMISSIONER CLARK: Mr. Alexander, would you  
16 repeat your question for me?

17 MR. ALEXANDER: I asked him if he has been an  
18 active participant in the negotiations regarding  
19 this issue, the RSAG download.

20 COMMISSIONER CLARK: Okay.

21 WITNESS THOMAS: Yes, I was in the negotiations  
22 when this was brought up. Cost at that time was not  
23 discussed, just the capability. They explained that  
24 this was a large database and that type thing, and  
25 we looked at it, and we said we need the download of

1 the RSAG. And we left it at that, and they came  
2 back and agreed to do it. That's to the extent I  
3 was involved in the negotiation. There was no price  
4 discussed in those negotiations.

5 BY MR. ALEXANDER (Continuing):

6 Q Does Exhibit 17 reflect a price that was  
7 achieved back in September? Do you see that on here on  
8 Page 2 of Exhibit 17, an estimate of a price?

9 MR. ADELMAN: Objection to the question. He  
10 said he wasn't involved in discussions of the price.  
11 Again, if he's asking him to read the letter, I'd  
12 suppose the questions --

13 MR. ALEXANDER: He earlier --

14 COMMISSIONER CLARK: I'm sorry. What --

15 MR. ADELMAN: This witness has stated that he  
16 was not present for any negotiations with regard to  
17 the pricing of the RSAG download. I object to the  
18 question. He has already indicated he doesn't have  
19 personal knowledge of that.

20 MR. ALEXANDER: That's not consistent with what  
21 he said earlier. He said he was aware that there  
22 was X price offered for this, and I don't know that  
23 we've ever ascertained whether he knows what that X  
24 price is, and this Exhibit 17 clearly reflects that,  
25 and I'm trying to ascertain that. I'm going to be

1 quite surprised --

2 COMMISSIONER CLARK: I thought you said you  
3 were not offering this for the truth of what was  
4 stated in the letter, only that it was sent.

5 MR. ALEXANDER: To the extent that I need to do  
6 so, I guess I would ask that I be allowed to. This  
7 is business records. It's correspondence between  
8 the two parties, and if it's hearsay at all, I think  
9 it's clearly an exception to that rule. And I guess  
10 I could back up --

11 MR. ADELMAN: Commissioner, in the interest of,  
12 I guess, judicial economy, Mr. Wood is the cost and  
13 rate expert. He's scheduled to appear here for  
14 ITC^DeltaCom.

15 COMMISSIONER CLARK: I'm having a little  
16 trouble understanding, sort of, the argument over  
17 all this thing. The letter has been sent. Perhaps  
18 it is hearsay. It appears to be an offer on behalf  
19 of BellSouth. The letter says what it says. I  
20 don't know what further you want from this witness.

21 MR. ALEXANDER: Well, let me ask him.

22 BY MR. ALEXANDER (Continuing):

23 Q Mr. Thomas, have you heard -- you mentioned  
24 earlier in your testimony that BellSouth had committed to  
25 do this and said X price. Do you know what X price is?

1           A     X price is, according to this document, 87  
2 thousand five hundred. I said X price because I didn't  
3 remember. I thought it was 80 something thousand, but I  
4 couldn't remember exactly.

5           Q     And you knew that independent of this letter,  
6 Mr. Thomas?

7           A     I knew this when you -- or not you, but the  
8 local counsel in Louisiana showed me this letter. That's  
9 what I knew that from.

10          Q     You had not been informed by anyone at DeltaCom  
11 before?

12          A     I think we had only received it a few days  
13 before the Louisiana hearing, and to do the math -- This  
14 is dated September 23rd, less than -- or right at a month  
15 ago, and I can't remember how long ago we were in  
16 Louisiana. About that long ago.

17          Q     October 4th was the start of the Louisiana  
18 hearing; is that correct?

19          A     Subject to check. I don't remember.

20          Q     Now, Mr. Thomas, I guess let me just try to  
21 wrap this discussion up. The bottom line is: Do you  
22 understand that BellSouth has actually agreed to allow  
23 DeltaCom to participate in the sharing prorata, as you've  
24 asked, for the development cost if DeltaCom will provide  
25 any other person or any other -- excuse me, any other

1 ALEC who is interested in doing this?

2 A I guess I wasn't aware of that. Like I said,  
3 I'm not the guy that BellSouth is going to negotiate with  
4 over how this is done. I'm here for -- or I'm here for  
5 DeltaCom during these things to see if we can actually  
6 download this database, and I'm responsible for getting  
7 that done. I'm not responsible for negotiating the deal  
8 with BellSouth on how it's paid for.

9 Q Okay. You mentioned that Ms. Edwards told you  
10 that MCI had indicated that they had discussed this,  
11 getting a download of the RSAG, with BellSouth; is that  
12 correct?

13 A Yeah, I believe it was -- I believe this  
14 Commission ordered BellSouth to do that in a proceeding,  
15 to provide a download of the RSAG to MCI, yes.

16 Q And do you know if MCI is still interested in  
17 that?

18 A No, I do not.

19 Q Okay. Does DeltaCom know of any other ALEC  
20 today that's willing to come forward and share in the  
21 prorata cost of the RSAG download and monthly updates to  
22 that database?

23 A I'm not aware of any. But, again, I'll say it  
24 again, I'm not going to be involved in the negotiations  
25 over the price of this download. And that includes

1 whether another ALEC is involved or not. I'm just saying  
2 it's fair -- it's only fair for BellSouth to be  
3 compensated once.

4 Q Okay. You've testified here, Mr. Thomas, that  
5 DeltaCom is asking the Commission to prorate these costs  
6 with other ALECs, and I'm asking you now: Do you know of  
7 any other ALECs, to DeltaCom's knowledge, to your  
8 knowledge as the witness on this issue, that is going to  
9 come forward and help participate in those costs with  
10 DeltaCom?

11 MR. ADELMAN: Objection. Asked and answered.

12 COMMISSIONER CLARK: Sustained.

13 BY MR. ALEXANDER (Continuing):

14 Q Okay. Let's talk about another issue. Let's  
15 talk about flow-through. Mr. Thomas, I believe it's  
16 Issue 22. It's in, I believe, your rebuttal, at Pages 10  
17 to 11, if you'd like to turn there.

18 (WITNESS COMPLIED)

19 A Okay, I'm on Page 10.

20 Q On Page 10 of your rebuttal, you discuss the  
21 issue regarding the definition of how order flow-through  
22 should be defined?

23 A Yes.

24 Q Okay. And DeltaCom believes the definition  
25 should include preordering activities; is that correct?

1           A       That's correct.  And the reason we believe that  
2 is because BellSouth uses preordering.  It's our  
3 understanding that BellSouth uses the preordering in the  
4 definition of flow-through.  In fact, I think it's in  
5 Mr. Pate's testimony.  He says the flow-through starts  
6 when the customer service representative has the customer  
7 on line.  That's the preordering part.  That's the  
8 intensive part or the time-consuming part.  Now they want  
9 to say, well, we're only going to count it for ALECs from  
10 the time you have a perfect LSR.  Well, that leaves a big  
11 piece of the pie out, and we don't believe it should be  
12 that way.

13           Q       When we talk about the definition of  
14 flow-through being included in the interconnection  
15 agreement, do you agree that it should be consistent with  
16 the FCC's definition of the flow-through?

17           A       I believe it should be consistent with  
18 BellSouth's definition of flow-through.  If BellSouth is  
19 a little bit more specific than the FCC, then DeltaCom  
20 should be too.  They should be the same.

21           Q       So I guess --  Do you know how the FCC defines  
22 flow-through?

23           A       I can't quote it.  I've seen it written, but I  
24 can't quote it.

25           Q       Do you know if BellSouth's proposed definition

1 of order flow-through for the interconnection agreement  
2 mirrors the FCC's definition?

3 A Yeah, I think maybe it does. It also -- like I  
4 said before, to the extent that BellSouth's definition,  
5 how they measure it for themselves is more specific than  
6 the FCC's, then to that same extent so should DeltaCom's  
7 be, and it should be in the agreement.

8 Q Mr. Thomas, can you tell us anywhere in any FCC  
9 order that the FCC has said that order flow-through  
10 should include preorder activities?

11 A No, I can't, but it does say that it should be  
12 parity; and parity -- if BellSouth chooses to include  
13 preordering, then so should DeltaCom.

14 Q And you would also propose -- DeltaCom being  
15 you -- that the definition of order flow-through would  
16 include electronic reports of order status and things  
17 like that, correct?

18 A That's what we've proposed, yes.

19 Q And are you aware of any FCC order that  
20 includes in the definition of order flow-through  
21 electronic order status?

22 A I can't cite it. I don't have it in front of  
23 me.

24 Q Do you know of one?

25 A I don't know of one.



1 Q So DeltaCom is asking the Florida Commission in  
2 this arbitration to adopt a definition of order  
3 flow-through that the FCC has never agreed to?

4 A I'm asking this Commission to define a  
5 definition of flow-through that is consistent with  
6 BellSouth's that includes the preordering piece, just  
7 like BellSouth's. That's what I'm asking the Commission  
8 to do.

9 Q Well, with respect to the two items I just  
10 mentioned to you, preordering activities and order  
11 status, those are not included in the FCC's definition of  
12 order flow-through, correct?

13 A To my knowledge, no.

14 Q And you are asking that they be included in  
15 your interconnection agreement here in front of the  
16 Florida Commission?

17 A It's a proposal, yes.

18 Q Do you know BellSouth's definition of order  
19 flow-through?

20 A We can go to Mr. Pate's testimony, and I can  
21 read it to you from there. It may take me just a minute  
22 to find it.

23 MR. ADELMAN: If BellSouth could provide a  
24 citation, that might expedite things.

25 MR. ALEXANDER: I asked Mr. Thomas.

1 MR. ADELMAN: Oh.

2 WITNESS THOMAS: I'm getting close here. I'm  
3 on the subject anyway. Here it is: "Based upon the  
4 FCC's definition, BellSouth contends that a service  
5 request flows through --"

6 COMMISSIONER CLARK: Did you give me a page?  
7 Did you give a page?

8 WITNESS THOMAS: I'm sorry. Let me -- Yeah,  
9 Page 13, starting on Line 1.

10 BY MR. ALEXANDER (Continuing):

11 Q You're in Mr. Pate's?

12 A Mr. Pate's direct testimony. Are you ready?

13 Q Page 13?

14 A Yes, sir.

15 Q Okay. What line?

16 A "Based upon the --" Line 1.

17 "Based upon the FCC's definition,  
18 BellSouth contends that a service  
19 request flows through an electronic  
20 order system only when an ALEC or  
21 BellSouth representative takes  
22 information directly from an  
23 end-user customer, inputs it directly  
24 into electronic order interface --"

25 And that's the preordering piece, and I'm outside

1 the quote here when I say that.

2           "-- directly from an end-user  
3           customer, inputs it directly into  
4           an electronic ordering interface  
5           without making any changes or  
6           manipulating the customer's information  
7           and sends the complete and correct  
8           request downstream for mechanized  
9           order generation."

10           The only part that they want to define for -- the  
11           only part of that that they want to define for the CLECs  
12           is, "and sends the complete and correct request  
13           downstream for mechanized order generation." That is  
14           what they want to define. It's right down there in the  
15           next paragraph. That's how they want to define it for  
16           the ALECs.

17           Q       And Mr. Thomas, Mr. Pate's testimony reflects  
18           that that's consistent with the FCC's definition?

19                   MR. ADELMAN:  Objection.  Is he just asking  
20           what Mr. Pate is saying?

21                   MR. ALEXANDER:  He just read that and said it's  
22           in Mr. Pate's testimony in the first four words,  
23           five words.  "Based upon the FCC's definition, is  
24           what he read."

25                   MR. ADELMAN:  Okay.  In which case he has asked

1 the question and answered it. If he's asking him to  
2 reread it --

3 MR. ALEXANDER: I didn't ask him that question,  
4 Mr. Adelman.

5 COMMISSIONER CLARK: Give me your question  
6 again.

7 MR. ALEXANDER: It's going to be a long day.  
8 The question was: Is the definition he just read  
9 from Mr. Pate's testimony, according to Mr. Pate's  
10 own testimony, consistent with the FCC's definition  
11 of order flow-through?

12 MR. ADELMAN: Just so I understand,  
13 Commissioner.

14 MR. ALEXANDER: You want me to repeat it again?

15 MR. ADELMAN: I object to the question. It's a  
16 compound question. Is he asking whether Mr. Pate  
17 said it was consistent, or is he asking whether it's  
18 consistent --

19 COMMISSIONER CLARK: He's asking whether  
20 Mr. Pate said it was consistent.

21 MR. ALEXANDER: I thought that was clear.

22 WITNESS THOMAS: Mr. Pate says, and as I read,  
23 "Based upon the FCC's definition." I think -- I  
24 mean that's what he said.

25 BY MR. ADELMAN (Continuing):

1 Q And do you know whether or not that is in fact  
2 true?

3 A I would have to sit down with the FCC's  
4 definition and look, but if that's consistent, then let's  
5 define that for the ALECs. I'll take that. We'll define  
6 that very definition in our contract for the ALECs.

7 Q And you believe that definition includes  
8 preordering activities --

9 A It absolutely --

10 Q -- and order status?

11 A It absolutely includes the preordering. No,  
12 not the status. Not the status, but the preordering  
13 piece, which is left out of how BellSouth defines it for  
14 the ALECs.

15 Q Mr. Thomas, let's turn to Pages 15 through 16  
16 in your rebuttal testimony where you deal with Issue 34.  
17 Are you familiar with that?

18 A I'm sorry. I'm flipping, so you're going to  
19 have to give me the page number again.

20 Q Pages 15 through 16 of your rebuttal.

21 A Okay, I'm on Page 15.

22 Q And there you're dealing with the repair  
23 information that DeltaCom says it needs from BellSouth in  
24 order to keep its customer informed; is that correct?

25 A That's correct.

1           Q     You do agree that with respect to repair and  
2 trouble reports that DeltaCom and BellSouth used the same  
3 electronic access, something called TAFI?

4           A     I agree. That's correct. We do. We use TAFI  
5 for our resale troubles. What we're -- the issue at hand  
6 in this issue here is the time and material. We accept  
7 what we get in TAFI. What we're asking for is time and  
8 material.

9                     And I've explained it briefly in my summary  
10 that the time is the labor for the technician and the  
11 material are the parts that he uses. We're requesting  
12 they send us a detailed bill, and then they refuse to  
13 agree to that in the contract. They want us to pay it,  
14 but they don't want to send us the details of how we're  
15 supposed to bill our end user and validate the bill.

16                    I've used the example before. It's like going  
17 to the restaurant and the waiter comes to your table when  
18 you're through and holds his hand out and says, That's  
19 going to be a hundred dollars. And you say, Well, you  
20 know, I'd like to see my check. Well, we can't do that.  
21 We can't give you a check because I eat here, you know,  
22 and I eat here for free. That's part of my salary, and  
23 they don't give me a bill, so sorry, sir, you can't have  
24 a bill, but it's going to be a hundred dollars. And  
25 that's the whole issue here on this trouble. We just

1 want an itemized bill.

2 Q Okay. Let me just be clear, Mr. Thomas.  
3 DeltaCom is not contending that it does not have-- let me  
4 take out all the negatives. Is your position that  
5 DeltaCom receives nondiscriminatory access to TAFI?

6 A To TAFI? Yes.

7 Q Okay. And the only issue with regard to this  
8 matter is whether or not DeltaCom can get time and  
9 material charges, a statement of those, in a manner that  
10 DeltaCom believes it needs?

11 A Just -- Before I say yes, I'm going to ask you  
12 to repeat it.

13 Q Okay. The only issue in dispute here is  
14 whether or not DeltaCom can have a list of the time and  
15 material charges associated with any repair that may  
16 happen as a result of a trouble ticket in a manner that  
17 DeltaCom believes that it needs?

18 A That's correct.

19 Q Okay. You are aware that BellSouth does not  
20 get time and material charges itself through TAFI; is  
21 that correct?

22 A Through TAFI?

23 Q Yes.

24 A Yes, that's correct. As I said in my summary,  
25 okay, it's not available in TAFI, we'll take it via

1 another electronic means. We understand that it's not  
2 there in TAFI, and we're not asking BellSouth to develop  
3 that in TAFI. We're just asking for them to provide us  
4 that information, preferably electronically, so we can  
5 validate it.

6 Q When DeltaCom enters a trouble report in TAFI,  
7 is it your position that DeltaCom will have to authorize  
8 BellSouth before it actually initiates or performs a  
9 repair?

10 A I'm not sure. I don't know. I don't submit  
11 trouble tickets myself, so I'm not sure if we have to  
12 authorize.

13 Q You're not contending that BellSouth goes out  
14 and makes whatever repairs it wants to on its own, do  
15 you?

16 A No, I think they go out and repair the customer  
17 as they need to be repaired; and if that takes parts off  
18 their truck to do that, it takes parts. And if it takes  
19 two hours or four hours or three people two hours or  
20 whatever it takes, that's what it takes. We're just  
21 asking for a detailed bill.

22 Q My question was, does DeltaCom authorize,  
23 before the repairs are made, the fact that those repairs  
24 will be made?

25 A I don't know. That's more of an issue of



1 who -- our provisioning department, our customer service  
2 department that actually uses -- they're users of TAFI.  
3 I don't know. I wasn't aware that they had to authorize  
4 BellSouth. I thought the entry in TAFI alone was  
5 authorization, but I'm not the expert on the  
6 authorization. I just don't know the answer.

7 Q Do you know what percentage of trouble tickets  
8 actually generate a repair, something that would create a  
9 time and material charge to DeltaCom?

10 A I don't have any idea.

11 Q Would you accept that it's probably a low  
12 percentage of overall trouble tickets?

13 MR. ADELMAN: Objection. He said he doesn't  
14 have any idea.

15 MR. ALEXANDER: Fair enough.

16 BY MR. ALEXANDER (Continuing):

17 Q Subject to check, if it's a low percentage, is  
18 DeltaCom willing to pay for the development cost of  
19 having this capability provided to it? Are you still  
20 willing to incur what may be a substantial cost in order  
21 to have time and material charges provided to you if it's  
22 not a significant amount?

23 MR. ADELMAN: Objection. You know, I've heard  
24 "subject to check" used when there was a precise  
25 number as a premise for the question. I've never

1 heard "subject to check" used with a vague and  
2 ambiguous premise: It's a low percentage. Perhaps  
3 Mr. Alexander could provide the percentage and then  
4 ask that it be accepted subject to check.

5 MR. ALEXANDER: I could, but I'm afraid it gets  
6 into your proprietary data, and I'm just asking,  
7 trying to avoid proprietary discussion here,  
8 confidential information.

9 BY MR. ALEXANDER (Continuing):

10 Q That the percentage of overall actual repairs  
11 compared to overall trouble tickets placed, do you know  
12 whether it's high or low?

13 A I do not know.

14 Q Okay. Hypothetically, if it's a low amount of  
15 actual repairs that are involved, is DeltaCom still  
16 willing to pay for the development of the capability to  
17 be provided the time and material charges as it's  
18 requesting here?

19 A I don't think we are because this is a  
20 fundamental way of doing business. You can go to the  
21 hardware store and get an itemized bill. This is  
22 ridiculous. If you're going to bill us, we need to know  
23 what you're billing us for, period.

24 Q Mr. Thomas, are you aware that DeltaCom does  
25 receive a bill from BellSouth listing charges for time

1 and materials?

2 A The time and materials. To my understanding,  
3 the time and materials are not detailed out on that bill  
4 that we receive.

5 Q Do you get a bill for time and material charges  
6 associated with any repair BellSouth makes on behalf of  
7 DeltaCom?

8 A Yes, we get a bill, and it is one line, and I  
9 think it says "site visit."

10 Q Has DeltaCom presented BellSouth with a, what  
11 used to be known as a BFR, Bona Fide Request -- now I  
12 believe they're called "New Business Request" -- for the  
13 development of this service since BellSouth does not  
14 provide it to itself through TAFI?

15 A As I said before, just because BellSouth  
16 doesn't bill itself, doesn't mean it shouldn't bill its  
17 customers. No, I don't know if we've submitted --  
18 That, again, would be regulatory that works  
19 interconnection agreements. I know it was discussed  
20 prior to this arbitration case being filed, and BellSouth  
21 refused to commit to provide it.

22 Q You would agree that if BellSouth does not have  
23 that capability today, that there would be a cost  
24 involved in developing such a capability?

25 A I assume that, if BellSouth is sending us a

1 bill somehow, they're aggregating that up to a site visit  
2 line with a total, they've got that information. They  
3 know how many parts they used to repair trouble. They  
4 know their man hours. They know this information. They  
5 just don't want to provide it to us for some reason. I'm  
6 not sure why.

7 Q You're not sure why, so you don't know whether  
8 or not BellSouth explained that there would be a charge  
9 associated with developing this capability?

10 A I don't know if BellSouth has explained there  
11 would be a charge. To my knowledge, they've never  
12 offered to provide it.

13 Q Has DeltaCom, again, to your knowledge,  
14 Mr. Thomas, not the regulatory group, but to your  
15 knowledge, has DeltaCom asked for a New Business Request  
16 for BellSouth to provide this capability?

17 MR. ADELMAN: Objection. Asked and answered.

18 MR. ALEXANDER: I don't think he answered from  
19 his knowledge.

20 MR. ADELMAN: I withdraw my objection.

21 COMMISSIONER CLARK: I need to ask that we take  
22 just a short break, five minutes, and I will be  
23 right back.

24 MR. ALEXANDER: I was going to say, that's my  
25 last question.

1           COMMISSIONER CLARK: I have to take a phone  
2 call.

3           MR. ALEXANDER: We'll stop.

4           COMMISSIONER CLARK: I'll be back in five  
5 minutes.

6           (BRIEF RECESS)

7           COMMISSIONER CLARK: Okay. We'll go back on  
8 the record. Mr. Alexander, your last question.

9           MR. ALEXANDER: If it's okay, just to make sure  
10 I'm fair, if the court reporter -- Is that going  
11 to put you on the spot to read the question back to  
12 Mr. Thomas?

13           THE COURT REPORTER: Yes, because I wrote on  
14 the back of my paper.

15           MR. ALEXANDER: I'm sorry. I'll try to ask it  
16 consistent with the earlier question.

17 BY MR. ALEXANDER (Continuing):

18           Q To your knowledge, has DeltaCom --

19           MR. ALEXANDER: To be honest with you, I need  
20 you to read it back. I was about to go down a path  
21 I think was different.

22           (WHEREUPON, THE COURT REPORTER REREAD THE  
23 QUESTION)

24           WITNESS THOMAS: I don't know is my answer,  
25 but we clearly tried to negotiate this into the

1 contract or it wouldn't be in this arbitration.  
2 BellSouth refused. That's the answer.

3 MR. ALEXANDER: No further questions.

4 COMMISSIONER CLARK: Staff.

5 CROSS EXAMINATION

6 BY MS. CALDWELL:

7 Q Good afternoon, Mr. Thomas.

8 A Good afternoon.

9 Q First of all, I'd like you to turn to Issue  
10 Number 5. Do you have that available to you?

11 A Are you in --

12 Q I'm in like the prehearing order or anything  
13 that has Issue Number 5 in it.

14 A I don't have it.

15 MR. ADELMAN: Your Honor, if I could approach,  
16 I can present him a copy of the order.

17 MS. CALDWELL: That would be fine.

18 (DOCUMENT TENDERED TO THE WITNESS)

19 BY MS. CALDWELL (Continuing):

20 Okay. And I ask that you read Issue Number 5.

21 A Okay.

22 Q On the record.

23 A "Should BellSouth be required to provide a  
24 download of the Regional Street Address Guide, RSAG? If  
25 so, how?"

1 Q All right. My question is: Is price  
2 specifically mentioned in the issue?

3 A No.

4 Q Thank you.

5 You testified in your depositions that -- and  
6 this can be subject to check, and I also have a page  
7 reference if you'd like to look at it, but maybe based on  
8 your memory of the depositions. You testified in  
9 depositions that nondiscriminatory OSS interface is  
10 something that provides access to their systems in  
11 basically the same time and manner that they have for  
12 themselves; is this correct?

13 A That's correct.

14 Q In your opinion, is ITC receiving  
15 nondiscriminatory access to BellSouth's OSS?

16 A No, we're not.

17 Q Would you please explain why not?

18 A Today, without the interfaces we use, we cannot  
19 parse the CSR. LENS does not parse the CSR. LENS is not  
20 integratable with EDI. Now BellSouth says, let's go to  
21 TAG; it's integratable. Okay, and now -- I believe this  
22 is fair to bring this up now. TAG does not parse the CSR  
23 either. BellSouth's system breaks that information up,  
24 as I understand it, and that's just an example of how  
25 it's not. My exhibit MT-2 is yet another example of how

1 when we send orders, and it -- I can't remember the  
2 percentages. X percent. It's confidential. A large  
3 percentage of those don't get FOCs within the 48-hour  
4 time frame, and it goes on and on.

5 MR. ALEXANDER: Commissioner Clark, just  
6 because he opened up a subject that didn't get to go  
7 in earlier on my cross, am I going to be entitled to  
8 ask him questions about how he knows that kind of  
9 information he just testified to?

10 COMMISSIONER CLARK: I will -- after staff is  
11 finished, I will let you ask additional cross  
12 examination, and then we'll go to redirect.

13 BY MS. CALDWELL (Continuing):

14 Q Mr. Thomas, you testified in your deposition  
15 that ITC is not receiving nondiscriminatory access to  
16 BellSouth's preordering capability; is that correct?

17 A That's correct.

18 Q Could you tell me which specific BellSouth OSS  
19 interfaces ITC needs in order to receive  
20 nondiscriminatory access to BellSouth's preordering  
21 capabilities?

22 A Well, we -- I don't know if I can name the --  
23 I'm not sure. Could you ask that to me one more time?  
24 I'm not exactly sure.

25 COMMISSIONER CLARK: Ms. Caldwell, and go



1            slower because I'm trying to understand your  
2            questions too.

3 BY MS. CALDWELL (Continuing):

4            Q        Which specific BellSouth OSS interface does ITC  
5            need in order to receive nondiscriminatory access to  
6            BellSouth's preordering capabilities?

7            A        My answer isn't meant to sound smart or short,  
8            but the answer is all of them.

9            Q        Does ITC have the required OSS interface to  
10           allow ITC to receive nondiscriminatory access to  
11           BellSouth's preordering capabilities?

12           A        Not today, no.

13           Q        And why not?

14           A        Again, we can't integrate. Now we're willing  
15           to do the integration, I'll just say that up front, of  
16           preordering and ordering. We can't do it with the LENS,  
17           which is what we're using today. TAG, they say TAG can.  
18           They also said TAG could parse the CSR, and it can't. So  
19           based on my limited knowledge of TAG, I'd have to say no.

20           Q        You also testified in your deposition that  
21           although ITC has the capability to validate addresses in  
22           LENS, this capability is not integrated into your system  
23           via LENS; is this correct?

24           A        That is correct.

25           Q        By our system, when you were referring to that,

1 what OSS system are you referring to?

2 A For which part, the address validation?

3 Q Yes.

4 A That would be LENS.

5 Q And did you state earlier that ITC uses LENS  
6 for preordering functions?

7 A Yes, I did.

8 Q Can LENS also perform ordering functions?

9 A Yes, for certain simple -- and I -- The last  
10 time I checked, it had a limitation of the number of  
11 orders. It was resale only. There are limitations on  
12 what you can order through LENS. Number of lines, I  
13 should say, not number of orders.

14 COMMISSIONER CLARK: What's the limitation,  
15 six?

16 WITNESS THOMAS: Six, I believe, yeah, that's  
17 the best I remember.

18 BY MS. CALDWELL (Continuing):

19 Q What OSS interface system does ITC use for its  
20 ordering functions?

21 A EDI. It's a customized EDI solution. And when  
22 I say customized, that means that we built it from  
23 scratch and tied it to our ordering system; so when we  
24 enter an order, it automatically goes via EDI.

25 Q Is that -- you enter it on your system, and

1 then it interfaces with the EDI, and then --

2 A Yeah, I guess I could get into a little of the  
3 technical issues if you'd like me to, but we have a  
4 service order processing system, and then there's a  
5 system that sits in the data center with it that takes  
6 information from that, converts it into an EDI format,  
7 and then sends it to a value-added network, or VAN  
8 service, that BellSouth picks that up.

9 Q And does this OSS interface system perform  
10 preordering and ordering functions?

11 A No, ma'am, it does not. Excuse me. Our system  
12 or the EDI system?

13 Q I think your system.

14 A It can't yet because it can't integrate with  
15 LENS. We're hoping to do that with TAG. That's what  
16 we're after. That's what we're trying to achieve.

17 Q You testified also in your deposition that  
18 BellSouth's TAG preordering capability was made available  
19 in August '98. I think -- and I think this question was  
20 asked and answered, but let me verify. The TAG  
21 preordering was available August of 1998, and the  
22 ordering capability was available in December of '98, or  
23 was it November?

24 A I think it was November. But, yes, that's  
25 correct.

1 Q And is it your opinion that BellSouth's TAG  
2 interface is capable of integrating preordering and  
3 ordering functions?

4 A I missed the first part of that, I'm sorry.

5 Q In your opinion, is BellSouth's TAG interface  
6 capable of integrating preordering and ordering  
7 functions?

8 A That's what BellSouth says, yes. It's my  
9 understanding that TAG can perform the preordering  
10 functions, or provide access to the preordering functions  
11 as well as the ordering functions.

12 Q Does TAG actually -- you said it provides  
13 access to the functions, so it's a way to interface with  
14 the preordering functions, or it actually does the  
15 preordering within the TAG system?

16 A Here's the way I understand it. It is a  
17 mechanism to access the capability to validate an  
18 address. It gives our system a way to say, here, call  
19 this function -- to get into the programming of it, call  
20 this function, and then return to me yes or no is this  
21 address valid. It is that functionality that hits the  
22 back-end, the way I understand it, the back-end BellSouth  
23 databases and returns back to our system. That's the way  
24 I understand how it's supposed to work.

25 Q Okay. And do you know if BellSouth's TAG is

1 capable of performing error checks?

2 A It's supposed to, from what I understand.  
3 We're still in the early stages of looking at all the  
4 capabilities, but that's what I understand.

5 Q All right. And then my last question, I think,  
6 goes back to the materials and time. If BellSouth were  
7 to provide you with the itemized time and material  
8 charges on magnetic media, would it have to be formatted  
9 in a specific way so that ITC's systems could use it?

10 A We would just have to know how it was formatted  
11 so that we could write the code on our end to decipher  
12 it. They would just have to tell us what format they  
13 chose to put it in. There --

14 Q And would --

15 A I'm sorry.

16 Q Go ahead.

17 A There are lots of industry-standard BellCore  
18 formats for exchanging billing information.

19 Q And you would be willing to accept a magnetic  
20 format?

21 A Yes, we would.

22 Q That's all the questions I have.

23 MS. CALDWELL: Thank you.

24 COMMISSIONER CLARK: Commissioner Jacobs.

25 COMMISSIONER JACOBS: No.

1           COMMISSIONER CLARK: Mr. Alexander, did you  
2           have some additional cross?

3           MR. ALEXANDER: Thank you. Very briefly.

4                           CROSS EXAMINATION

5           BY MR. ALEXANDER (Continuing):

6           Q     Mr. Thomas, you stated that you have a limited  
7           knowledge of TAG; is that correct?

8           A     That's what I said, yeah. I guess, relatively  
9           speaking, limited.

10          Q     And then you also stated that TAG cannot parse  
11          the CSR; is that also correct?

12          A     That's correct. That's my understanding.

13          Q     What is the basis of your understanding?

14          A     This BellSouth Change Request Form submitted by  
15          AT&T. I can read it to you.

16          Q     What's the date of that document?

17          A     It is -- date change request submitted was  
18          8/12/99. It was submitted by Jill Williamson of AT&T.  
19          Title of the change is "Parse CSR. Add functionality.  
20          It is a -- originating at CCM, assessment of impact. I'm  
21          not what sure CCM is. It's major originating CCM access.  
22          Assessment of priority is urgent. Interface impacted,  
23          LENS and TAG. Type of change is a software industry  
24          standard change. Software being one category; industry  
25          standards being another. And then the description says:

1 "As part of the OSS '99 upgrade, AT&T, requested that  
2 BellSouth deliver a parse CSR as part of the preorder  
3 functionality and in alignment with the industry  
4 guidelines. BellSouth stated that it could not deliver  
5 this capability with OS (sic) '99 but would look at  
6 implementing it as part of the second phase --" second  
7 phase being in quotes -- "of OS (sic) '99. BellSouth  
8 also agreed to develop a project plan to work on  
9 implementation of this functionality over the Y2K window  
10 for delivery. Subsequent to the close of the Y2K window,  
11 AT&T is requesting that this functionality be delivered  
12 in the first quarter of 2000.

13 Q Okay. Now that's a letter in August of this  
14 year from AT&T to BellSouth?

15 A This is part of the EICCP, change request  
16 mechanism. This is a change request form that is in the  
17 EICCP.

18 Q Did you obtain that document as a member of  
19 that ECCIP (sic)?

20 A Yes, I did.

21 Q And it --

22 A Actually someone that reports to me, but yes.

23 Q And do you have a response from BellSouth to  
24 that document from August?

25 A They have acknowledged it. I have an

1 acknowledgement here. It was acknowledged on 8 -- date  
2 of notification says 8/16, by Pat Rand.

3 Q My question is: Have you seen a response from  
4 BellSouth to a document sent to them in August, mid  
5 August of this year, regarding that request?

6 A I have not seen -- other than the  
7 acknowledgement, I've not seen another response from  
8 BellSouth.

9 Q Have you made an independent evaluation of TAG  
10 to ascertain whether that's an accurate description by  
11 AT&T or not?

12 A I have asked a vendor of an ILEC gateway --  
13 that vendor's name is Mantis -- if this, in fact, was  
14 true; and they verified that, yes, it was true; that TAG  
15 does not parse the CSR.

16 Q Okay. Let's talk about parsing the CSR. Is  
17 that simply breaking down information from a customer  
18 service record?

19 A Yes, it's breaking down information into  
20 valuable pieces that you can use, such as customer name.

21 MR. ADELMAN: Commissioner, if I could object  
22 at this time. And the ruling you made that allowed  
23 cross on top of cross, I believe, was limited to  
24 discovering what the reference was, and I think we  
25 are now going beyond that.



1 COMMISSIONER CLARK: Would you like to respond?

2 MR. ALEXANDER: Yes. He's basically said that  
3 he's seen a document in August on one side of the  
4 story, and I'm asking him if he has any independent  
5 knowledge of that information regarding this, other  
6 than that document.

7 COMMISSIONER CLARK: I think that's fair.

8 MR. ADELMAN: I thought he was asking about  
9 the CSR and what that means and parsing the CSR.

10 COMMISSIONER CLARK: Well, I think it is  
11 important to know that we have a common  
12 understanding of what parsing the CSR means, and  
13 I'll allow the question.

14 MR. ALEXANDER: Thank you.

15 WITNESS THOMAS: He said one side of the  
16 argument. I would say that that is BellSouth's side  
17 of the argument. That's their form.

18 BY MR. ALEXANDER (Continuing):

19 Q Mr. Rozycki, who filled that form out?

20 A I'm Mister --

21 Q I'm sorry. Mr. Thomas. I'll get you straight.

22 A I'll take that as a compliment though.

23 Q I hope he does.

24 A He probably doesn't.

25 Please restate it now that we've had that

1 exchange.

2 Q He's shaking his head for our record.

3 Is that a form that was filled out by AT&T?

4 A I'm not sure. I would assume it was the  
5 product of an EICCP meeting. This is a form where they  
6 take these requests and enter them, so I assume that  
7 BellSouth accepted this as valid.

8 Q But you don't know whether AT&T filled it out  
9 or BellSouth filled it out, and you don't know whether  
10 BellSouth has responded to that either, do you?

11 A I don't know if they've responded. If they  
12 have, I haven't seen anything, and I would assume that  
13 AT&T submitted this request to BellSouth.

14 Q Thank you.

15 Back to the parsing of the CSR. You stated  
16 that parsing basically is breaking down information from  
17 a database; is that correct?

18 A It's from a file right now in LENS. We can --  
19 What we have to do is copy and paste it. Highlight it,  
20 copy and paste it off the Web interface, and then --  
21 It's data. It's HTML. It's the HTML presentation of the  
22 data, or you can just parse out the text and -- or just  
23 cut out the text. And what I mean by parse is, you've  
24 got to know --

25 COMMISSIONER CLARK: I need -- Yeah, that's

1           what you need to answer.  What does parse mean?

2           WITNESS THOMAS:  What does parse mean?  It  
3           means to break apart a string of data that's  
4           formatted in a certain way so that -- let's, for  
5           instance, customer name, and I don't remember  
6           exactly what a CSR looks like, but it has like a  
7           slash CN for customer name.  That's probably not  
8           correct.  And then it's got Mike Thomas, the name.  
9           So it would be looking for those tags, slash CN,  
10          and, no, okay, that's customer name.  I've got to  
11          pull off this many bits or characters and say, okay,  
12          there's my customer name.  And I pull that off of  
13          this electronic screen.  Just like in Word,  
14          Microsoft Word or something where you've got an  
15          electronic document.  It's just picking apart  
16          characters off of the document.

17  BY MR. ALEXANDER (Continuing):

18          Q       And given that definition of parsing, do you  
19          know whether or not, to your personal knowledge, TAG  
20          provides ALECs with a stream of data, to use your  
21          information, from the Customer Service Record, the CSR  
22          files, that can be broken down by the ALEC using TAG?

23          A       That's the plan, and we've got the CSR parsing  
24          rules; but now I'm really concerned that if BellSouth  
25          can't seem to do it, how we're supposed to do it, even if

1 they've given us their rules. It must -- there's  
2 something more to it here. BellSouth says, Here's the  
3 rules, but they're not doing it.

4 Q Mr. Thomas, my question was: Do you know  
5 whether or not TAG provides the ALECs with a stream of  
6 data from the Customer Service Record files, the CSRs  
7 that can be broken down by the ALEC by using TAG?

8 A It provides a big block of text, that is my  
9 understanding, just as LENS does.

10 Q And can that data be broken down by parsing  
11 that information however the ALEC desires?

12 A That's the plan. Again, it remains to be seen.

13 COMMISSIONER CLARK: I think his question is:  
14 Do you know that it can be done or can't be done?

15 WITNESS THOMAS: I don't know if it can be  
16 done. BellSouth has given us the rules, but  
17 according to my conversation with this vendor,  
18 Mantis, it only applies, the rules -- because the  
19 way the CSR is formatted, you can't necessarily pull  
20 off all of the features that are associated with  
21 each line. See, you've got a CSR with ten lines and  
22 a variable number of features for each line. I  
23 don't think that the rules are such that in every  
24 case that will work.

25 COMMISSIONER CLARK: Well, but your information

1 is not from doing it yourself, but looking at this  
2 document submitted to BellSouth and talking to your  
3 vendor?

4 WITNESS THOMAS: Yes.

5 COMMISSIONER CLARK: Okay.

6 MR. ALEXANDER: Thank you, Commissioner Clark.

7 BY MR. ALEXANDER (Continuing):

8 Q So it's not to anything in your personal  
9 knowledge, right, Mr. Thomas?

10 A I have not -- As I said before, we haven't  
11 built out to TAG yet, so we don't know.

12 MR. ALEXANDER: Thank you for allowing me to do  
13 some recross.

14 COMMISSIONER JACOBS: Now if I'm not mistaken,  
15 in this agreement there is some language that is now  
16 anticipated on CSRs; is that correct? There was an  
17 issue on CSRs here that has been resolved, is there  
18 not?

19 WITNESS THOMAS: Yes, and that issue was  
20 BellSouth to provide us with the rules to parse the  
21 CSR.

22 COMMISSIONER JACOBS: So you'll face that same  
23 limitation possibly?

24 WITNESS THOMAS: Yes.

25 COMMISSIONER JACOBS: How do you resolve that?

1           WITNESS THOMAS: Well, we try to take their  
2 rules and tear apart the CSR based on what rules  
3 they gave us.

4           COMMISSIONER JACOBS: Okay.

5           WITNESS THOMAS: That's just where we are on  
6 it.

7           COMMISSIONER JACOBS: Thank you.

8           COMMISSIONER CLARK: Redirect.

9           MR. ADELMAN: Briefly, Commissioner.

10                           REDIRECT EXAMINATION

11 BY MR. ADELMAN (Continuing):

12           Q     Mr. Thomas, I want to -- it's really as much  
13 housekeeping as anything, Commissioner Clark. I'm  
14 handing you a document. It's three pages. I'd like you  
15 to just explain for the record what I've just handed you,  
16 please.

17           MR. ALEXANDER: I'm going to object. This is  
18 information that the witness volunteered. He's  
19 already read it into the record. I can see no  
20 useful purpose in rereading this document, and  
21 BellSouth would certainly object to this.  
22 Mr. Thomas does not have personal knowledge of  
23 this. He said someone that works for him actually  
24 provided it to him. He was not in the meetings, and  
25 for the very same reasons Mr. Adelman likes to

1 object to documents, I'll do the same here.

2 MR. ADELMAN: Commissioner, I've asked him to  
3 identify the document.

4 MR. ALEXANDER: And he did, and I'm not  
5 agreeing that by talking about it that it can be  
6 admitted into this proceeding.

7 COMMISSIONER CLARK: I understand that. We  
8 will identify it as Exhibit 18, and it is -- it's a  
9 document headed BellSouth Change Request Form. It  
10 consists of -- let's see.

11 MR. ADELMAN: Commissioner, we can even --

12 COMMISSIONER CLARK: Two pages are RF-1870, and  
13 one page is, it's just -- It's 598. One is a -- it  
14 appears to be a request from a Jill Williamson, and  
15 it's two pages; and the last one appears to be an  
16 acknowledgement notification. We're going to mark  
17 that as Composite Exhibit 18.

18 BY MR. ADELMAN (Continuing):

19 Q Mr. Thomas, is that the document you were  
20 referring -- Those documents, are those the documents  
21 you were referring to in response to questions from  
22 Mr. Alexander?

23 A Yes, it is.

24 Q And can you please describe for me your  
25 understanding, briefly, of what those documents are and,

1 in particular, in what process or forum those documents  
2 would be produced?

3 MR. ALEXANDER: And I'm going to object. This  
4 witness has already testified that he was not there,  
5 that he did not personally obtain this, that someone  
6 else in his group did. I don't think he's  
7 established he has any personal knowledge to be able  
8 to describe this document and what its purpose is.

9 MR. ADELMAN: Commissioner, he was asked  
10 questions about the document. He relied on them,  
11 and if ever there was a business records exception  
12 to the hearsay rule, this is it.

13 MR. ALEXANDER: And I disagree that I asked him  
14 questions about it. He volunteered that and read  
15 from it. I allowed him to talk from it. I asked  
16 him what was the basis of his knowledge, and he  
17 immediately tried to start talking from this  
18 document. And now to introduce the document, which  
19 I very carefully did not ask to see or to have put  
20 in this record because I think it is hearsay and he  
21 doesn't have knowledge about it. I did ask him in  
22 order to ascertain that. Now he's trying to, on  
23 redirect, try to establish some knowledge of this in  
24 order to authenticate the document which I would say  
25 is very improper.



1           COMMISSIONER CLARK: I'm going to allow the  
2           questions to continue, and then we will deal with  
3           admitting it into the record.

4           MR. ADELMAN: Thank you.

5 BY MR. ADELMAN (Continuing):

6           Q     Do you want me to repeat the question?

7           A     Please do.

8           Q     Can you please describe those documents, and in  
9           particular, could you describe the forum in which those  
10          documents would be produced and discussed?

11          A     Okay, this is a BellSouth Change Request Form  
12          that is a request form for CLECs to submit changes to  
13          electronic interfaces to BellSouth. It is done in the  
14          electronic interface change control process which someone  
15          that works for me is a member. Unfortunately, I don't  
16          get to develop code and do things like that. I run a  
17          department, and so, no, I don't personally go to these  
18          meetings; but I have representatives there that represent  
19          our company and my department. And the other form is  
20          BellSouth's acknowledgement of this change request.

21          Q     And I don't know if the previous question was  
22          answered, so at the risk of asking a question that's  
23          already been answered, are these the documents to which  
24          you referred in response to Mr. Alexander's questions?

25          A     Yes, they were -- or are.

1 Q And these documents form, in part, form the  
2 basis of your opinion with regard to the capabilities of  
3 the TAG, the proposed TAG interface; is that correct?

4 A That's correct.

5 MR. ALEXANDER: Objection to leading.

6 BY MR. ADELMAN (Continuing):

7 Q And are there other things that form the basis  
8 of your opinion with regard to the capabilities of TAG?

9 A Yeah, it's --

10 COMMISSIONER CLARK: Just a minute. I'm going  
11 to allow him to ask that question in that way, but  
12 please do not lead the witness.

13 MR. ADELMAN: Thank you, Commissioner.

14 BY MR. ADELMAN (Continuing):

15 Q Are there any other factors which have caused  
16 you to form your opinion with regard to the capabilities  
17 of TAG as it relates to the parsing of CSRs?

18 MR. ALEXANDER: I'm going to object. He's  
19 asking this witness as though he has been tendered  
20 as an expert on TAG. He has already said he has a  
21 limited knowledge of that. I went back over that.  
22 He testified to that on his own volition. This  
23 witness is not an expert and able to form opinions.  
24 He has never even used TAG.

25 COMMISSIONER CLARK: I guess I'm getting

1 confused because I'm hearing on redirect what was  
2 asked on cross. He said the only basis on which he  
3 says that TAG can't parse CSR is this and the  
4 vendor's representation. Do we have to go over that  
5 again?

6 BY MR. ADELMAN (Continuing):

7 Q Is that correct? Are those the two bases?

8 A Yes, we -- as part of our --

9 MR. ADELMAN: I withdraw the question,  
10 Commissioner, and I apologize. I withdraw the  
11 question. If you believe that's on the record, then  
12 I have no further questions. I would move for  
13 admission of this --

14 COMMISSIONER CLARK: You have no further  
15 questions of this witness?

16 MR. ADELMAN: No further direct questions --  
17 redirect questions.

18 COMMISSIONER CLARK: Okay.

19 MR. ADELMAN: And I would now move for the  
20 admission of the three-page exhibit.

21 MR. ALEXANDER: And BellSouth objects.

22 COMMISSIONER CLARK: All right. Let me just  
23 take them in order. Exhibit 16, do you move that  
24 into the record? And is there any objection to  
25 Exhibit 16?

1 MR. ADELMAN: Sixteen is the two exhibits that  
2 were attached to his prefiled direct, correct?

3 COMMISSIONER CLARK: Yes, that is correct.

4 MR. ADELMAN: We do move for admission of those  
5 two exhibits.

6 COMMISSIONER CLARK: Any objection?

7 MR. ALEXANDER: No objection.

8 COMMISSIONER CLARK: No objection, all right.  
9 Exhibit 17 is the letter to Nanette Edwards.

10 MR. ALEXANDER: I do move for admission.

11 COMMISSIONER CLARK: Is there any objection?

12 MR. ADELMAN: There's no objection.

13 COMMISSIONER CLARK: Okay. Exhibit 18.

14 MR. ADELMAN: We move for the admission of 18.

15 MR. ALEXANDER: And we object.

16 COMMISSIONER CLARK: Okay. What is the basis  
17 of your objection?

18 MR. ALEXANDER: This witness has no personal  
19 knowledge of this document. He couldn't even tell  
20 us if BellSouth or AT&T filled this out. You know,  
21 he's reading the cover of it, that it's a  
22 BellSouth's form. I'm not sure if it's an  
23 electronic document that is in AT&T's system or  
24 whatever it is that they may have gotten from  
25 BellSouth. He really has no personal knowledge and

1 cannot authenticate this document. It is -- you  
2 know, he's not even at these meetings where this is  
3 discussed. He's just representing that someone from  
4 DeltaCom that works for him came back and said, hey,  
5 this happened at this meeting back in August. He  
6 doesn't know whether they filled it out or BellSouth  
7 did it. He cannot verify this document. It cannot  
8 be authenticated.

9 COMMISSIONER CLARK: It is hearsay?

10 MR. ALEXANDER: It's hearsay, and it's being  
11 offered as though it's -- for the truth of what's in  
12 the document.

13 COMMISSIONER CLARK: Now I just want to be  
14 clear, the basis of your objection is hearsay and  
15 part of that is it is being -- it is hearsay because  
16 it is being offered for the truth of what is stated  
17 in the document?

18 MR. ALEXANDER: Absolutely.

19 COMMISSIONER CLARK: All right. Anything else?

20 MR. ALEXANDER: And also this witness can't  
21 authenticate the document.

22 COMMISSIONER CLARK: Okay. Would you respond  
23 to that?

24 MR. ADELMAN: Commissioner, this document is  
25 clearly a business record. Indeed, it's a record

1           that relates to a forum, an industry forum that is  
2           led by BellSouth. All of Mr. Alexander's arguments  
3           go to the weight of the evidence. They don't go to  
4           the admissibility of the evidence. As far as  
5           authentication of this document, he did state that  
6           he did not author this document; however, the doc --  
7           no one has challenged whether it is indeed a  
8           business form that has been submitted to BellSouth  
9           and whether the acknowledgement of that submission  
10          was indeed made by BellSouth.

11           MR. ALEXANDER: I think he's got the cart  
12          before the horse. He's got to establish it through  
13          authenticating that, and BellSouth does object to  
14          it. This witness -- I mean it's double and triple  
15          hearsay. He's saying he got it from somebody who  
16          got it from somebody else.

17           MR. ADELMAN: We've got our IS expert who has  
18          been asked questions by BellSouth about his  
19          understanding of the capabilities of TAG, and then  
20          when he goes to respond to the question that was  
21          propounded by BellSouth, he's being told he cannot  
22          describe the basis of his opinion and it cannot be  
23          admitted as evidence. There's already a lengthy  
24          discussion of this document. Really, the inclusion  
25          of the document in evidence, I think, is required

1 just for clarity. He's read what was on the face of  
2 at least one of the pages. I certainly see no  
3 prejudice to allowing the actual page itself to be  
4 marked and admitted. We've marked all sorts of  
5 things and moved them in depositions and the like.

6 COMMISSIONER CLARK: Thank you. Staff, do you  
7 have any position on this?

8 (NEGATIVE INDICATIONS)

9 COMMISSIONER CLARK: At this point I am going  
10 to admit it into the record. I think it does appear  
11 to me to be hearsay, but I think that it would  
12 certainly go to the weight of the evidence. There's  
13 been an acknowledgement by the witness as to what he  
14 based his opinion on with regard to the ability of  
15 TAG to parse CSR, and it does appear to me that -- I  
16 think the APA allows for evidence that people would  
17 rely on in the normal course of business. That's my  
18 vague recollection of it, so at this point I am  
19 going to admit it in the record.

20 MR. ADELMAN: Thank you. And we ask that  
21 Mr. Thomas be excused.

22 COMMISSIONER CLARK: You are excused,  
23 Mr. Thomas. Thank you very much.

24 All right. We'll go to our next witness.

25 MR. ALEXANDER: I do believe it will be rather

1           lengthy.

2           COMMISSIONER CLARK: I'm sorry?

3           MR. ALEXANDER: I do believe it will be rather  
4           lengthy. I don't know what time we were going to  
5           stop. This is the one that I --

6           COMMISSIONER CLARK: We can get started on him.

7           MR. ALEXANDER: Okay.

8           COMMISSIONER CLARK: You are Mr. Hyde?

9           WITNESS HYDE: Yes, I am.

10          COMMISSIONER CLARK: All right. Why don't we  
11          just take five minutes while you do that.

12          MR. ADELMAN: And Commissioner, we'll spend the  
13          time -- we have different portions of the testimony  
14          that have been stricken, so we'll present that in  
15          the same way we did Mr. Thomas. Is that --

16          COMMISSIONER CLARK: Okay.

17          MR. ADELMAN: Thank you.

18          (BRIEF RECESS)

19          (Whereupon, the transcript is continued in  
20          Volume 3 without omission)

21

22

23                           \*           \*           \*           \*

24

25



<#>  
#16: 196:3  
#17: 196:4  
#18: 198:6

<>  
'98: 262:15, 300:19, 300:22  
'99: 304:1, 304:5, 304:7

<1>  
1: 201:17, 283:9, 283:16  
10: 201:22, 224:11, 224:12, 255:12, 279:16, 279:19, 279:20  
11: 224:14, 279:17  
12: 202:10, 202:15, 202:20, 202:22, 202:25, 203:1, 248:21, 253:1, 253:18  
12-month: 254:10, 254:10, 254:24  
13: 202:15, 224:14, 283:9, 283:13  
13th: 223:3, 223:15  
14: 224:15, 224:17  
148: 194:18  
15: 197:22, 201:23, 202:10, 203:2, 203:3, 224:14, 259:21, 286:15, 286:20, 286:21  
16: 202:8, 286:15, 286:20  
17: 202:4, 223:4, 223:15  
18: 203:3, 203:3, 317:14  
19: 201:1  
194: 194:10  
1997: 283:1  
1998: 282:12, 282:17, 282:16, 300:21  
1999: 223:3, 223:15

<2>  
2: 194:9, 202:11, 203:2, 224:11, 224:13, 275:8  
2(a): 255:13, 255:21  
20: 224:17  
200: 195:6  
2000: 304:12  
204: 195:6  
22: 255:7, 255:6, 255:12, 255:15, 255:22, 279:16

226: 196:3  
227: 195:7  
24: 202:5  
251: 195:7  
270: 196:5  
295: 195:8

<3>  
3: 224:10, 321:20  
303: 195:8  
311: 195:9  
312: 198:8  
317: 196:3, 196:5  
320: 196:6  
321: 194:10  
34: 286:16

<4>  
4: 201:16, 202:9, 255:12  
4075: 194:18  
45: 244:17, 245:12, 250:17  
48-hour: 297:3

<5>  
5: 201:15, 202:5, 202:10, 203:1, 224:11, 251:9, 295:10, 295:13, 295:20  
598: 312:13

<6>  
6: 202:8, 202:14, 202:20, 202:22, 252:25, 253:16, 254:10, 254:24

<7>  
7: 202:8

<8>  
8: 201:20, 203:3, 305:1  
8/12/99: 303:18  
8/16: 305:2  
80: 277:3  
87: 277:1

<9>  
9: 224:12, 224:12  
9/23/99: 196:4  
9:00 a.m.: 194:16  
9:30: 199:21  
990750-TP: 194:4

<A>  
ability: 201:17, 244:18, 250:2, 320:14  
able: 199:4, 245:9, 247:10, 250:3, 250:11, 250:19, 252:12, 261:3, 261:22, 262:7, 313:7, 315:23  
Absolutely: 286:9, 286:11, 318:18  
accept: 250:15, 253:9, 259:4, 267:14, 267:15, 269:19, 287:6, 290:11, 302:19  
accepted: 273:12, 291:4, 307:7  
accepts: 260:9  
Access: 246:8, 251:25, 252:8, 256:15, 261:2, 261:10, 261:22, 262:2, 267:6, 274:1, 287:3, 286:5, 296:10, 296:15, 297:15, 297:20, 298:5, 298:10, 301:10, 301:13, 301:17, 303:21  
accessing: 252:3  
according: 277:1, 285:9, 309:17  
accurate: 249:19, 259:20, 261:21, 268:14, 305:10  
achieve: 300:16  
achieved: 275:7  
acknowledged: 304:25, 305:1  
acknowledgement: 305:1, 305:7, 312:16, 314:20, 319:9, 320:13  
acquire: 246:17  
acquired: 245:23  
across: 249:8, 250:21, 274:1  
active: 274:12, 274:18  
activities: 279:25, 281:10, 282:10, 286:8  
actual: 267:1, 267:2, 291:10, 291:15, 320:3  
Actually: 256:9, 261:4, 263:9, 265:1, 273:4, 277:22, 276:5, 289:6, 290:2, 290:8, 301:12, 301:14, 304:22, 311:23  
ad: 256:24  
Add: 303:19  
addition: 244:24, 250:6  
additional: 297:11, 303:2  
Address: 246:25, 246:25, 248:23, 251:12, 251:15, 251:22, 252:16,

259:17, 261:6, 261:16, 263:8, 263:9, 263:9, 263:13, 263:16, 263:19, 263:22, 264:7, 264:19, 264:22, 265:2, 269:25, 295:24, 299:2, 301:18, 301:21  
addressed: 271:17, 271:22  
addresses: 246:23, 248:24, 246:25, 251:17, 251:18, 252:3, 252:13, 252:17, 258:14, 261:13, 261:19, 262:7, 298:21  
ADELMAN: 195:6, 195:9, 199:2, 200:2, 200:4, 200:19, 201:7, 201:14, 202:13, 202:17, 202:20, 203:1, 203:5, 203:15, 203:22, 223:1, 223:10, 223:13, 223:22, 224:3, 224:10, 224:16, 225:5, 225:11, 225:20, 226:1, 226:3, 226:7, 226:10, 226:16, 244:1, 247:16, 247:19, 248:2, 248:7, 248:14, 248:15, 250:25, 254:6, 255:21, 267:23, 268:6, 268:23, 268:25, 271:4, 271:15, 272:2, 272:4, 273:10, 275:9, 275:15, 276:11, 279:11, 282:23, 283:1, 284:19, 284:25, 285:4, 285:12, 285:15, 285:25, 290:13, 290:23, 293:17, 293:20, 295:15, 305:21, 308:8, 311:9, 311:11, 311:25, 312:2, 312:11, 312:16, 313:9, 314:4, 314:5, 315:6, 315:13, 315:14, 316:6, 316:9, 316:16, 316:19, 317:1, 317:4, 317:12, 317:14, 318:24, 319:17, 320:20, 321:12, 321:17  
admissibility: 319:4  
admission: 225:14, 316:13, 316:20, 317:4, 317:10, 317:14  
admit: 196:1, 198:5, 320:10, 320:19  
admitted: 312:6, 319:23, 320:4  
admitting: 314:3  
ADMTD: 196:2  
adopt: 258:22, 282:2  
advance: 244:17, 245:12  
advanced: 244:16, 250:17  
affect: 244:18  
affecting: 245:11  
affects: 245:5  
afraid: 291:5  
afternoon: 244:7, 251:6, 251:7, 295:7, 295:8  
aggregating: 293:1  
ago: 245:18, 257:2, 277:15, 277:15, 277:16  
agree: 201:10, 256:4, 273:15, 280:15, 287:1, 287:4, 287:13, 292:22  
agreed: 249:2, 259:3, 259:4, 271:1, 273:4, 275:2, 277:22, 282:3, 304:8  
agreeing: 312:5  
agreement: 249:24, 269:25, 270:3, 280:15, 281:1, 281:7, 282:15, 310:15

**agreements:** 292:19  
**ahead:** 201:13, 223:12, 262:20, 266:6, 302:16  
**ALEC:** 257:4, 274:6, 278:1, 278:19, 279:1, 263:20, 306:22, 309:7, 309:11  
**ALECs:** 249:18, 256:7, 260:9, 274:1, 279:6, 279:7, 280:9, 284:16, 286:5, 286:6, 286:14, 308:20, 309:5  
**ALEXANDER:** 195:7, 195:8, 198:12, 202:12, 202:14, 202:18, 202:25, 247:13, 248:10, 251:2, 251:3, 251:5, 254:3, 254:8, 254:22, 255:7, 255:9, 255:14, 255:18, 255:24, 255:25, 260:6, 265:21, 268:1, 288:4, 268:11, 269:1, 269:3, 270:5, 270:7, 270:17, 271:14, 271:19, 272:12, 272:20, 272:23, 273:22, 274:15, 274:17, 275:5, 275:13, 275:20, 276:5, 276:21, 276:22, 279:13, 282:25, 283:10, 284:21, 285:3, 285:7, 285:14, 285:21, 290:15, 290:16, 291:3, 291:5, 291:9, 293:18, 293:24, 294:3, 294:8, 294:9, 294:15, 294:17, 294:19, 295:3, 297:5, 303:1, 303:3, 303:5, 306:2, 306:14, 306:18, 308:17, 310:6, 310:7, 310:12, 311:17, 312:4, 312:22, 313:3, 313:13, 315:5, 315:18, 316:21, 317:7, 317:10, 317:15, 317:18, 318:10, 318:18, 318:20, 319:11, 320:25, 321:3, 321:7  
**Alexander's:** 314:24, 319:2  
**alignment:** 304:3  
**Allow:** 250:19, 252:16, 258:16, 272:21, 277:22, 298:10, 306:13, 314:1, 315:11  
**allowed:** 266:9, 276:6, 305:22, 313:15  
**allowing:** 249:4, 274:6, 310:12, 320:3  
**allows:** 244:22, 320:16  
**almost:** 262:18, 262:23  
**alone:** 272:15, 290:4  
**already:** 201:25, 253:18, 275:18, 311:19, 313:4, 314:23, 315:20, 319:23  
**although:** 298:21  
**altogether:** 197:24  
**ambiguous:** 291:2  
**amount:** 249:22, 266:17, 290:22, 291:14  
**anew:** 259:12  
**answer:** 201:2, 223:4, 223:16, 256:13, 259:9, 267:24, 268:8, 273:10, 273:11, 290:6, 294:24, 295:2, 298:7, 298:8, 308:1  
**answered:** 267:24, 279:11, 285:1, 293:17, 293:18, 300:20, 314:22, 314:23  
**answers:** 203:12, 225:3  
**anticipate:** 199:3, 199:15, 199:21, 252:25

**authenticating:** 319:13  
**authentication:** 319:5  
**author:** 271:6, 271:18, 319:6  
**authorization:** 290:5, 290:6  
**authorize:** 289:7, 289:12, 289:22, 290:3  
**automatically:** 263:24, 299:24  
**available:** 248:24, 250:14, 261:7, 262:10, 267:17, 288:25, 295:10, 300:18, 300:21, 300:22  
**avoid:** 264:3, 264:4, 291:7  
**aware:** 275:21, 278:2, 278:23, 281:19, 288:19, 290:3, 291:24  
  
**<B>**  
**Back:** 197:3, 246:16, 261:15, 263:25, 264:12, 264:14, 264:16, 265:22, 266:12, 268:2, 275:2, 275:7, 276:10, 293:23, 294:4, 294:7, 294:11, 294:14, 294:20, 301:23, 302:6, 307:15, 315:21, 318:4, 318:5  
**back-end:** 266:24, 301:22, 301:22  
**background:** 263:25  
**base:** 248:23, 251:16, 252:3  
**Based:** 201:10, 283:3, 283:16, 283:17, 284:23, 285:23, 296:7, 298:19, 311:2, 320:14  
**bases:** 316:7  
**basically:** 245:10, 249:1, 258:23, 258:24, 266:16, 296:11, 306:2, 307:16  
**basis:** 272:3, 303:13, 313:16, 315:2, 315:7, 316:2, 317:16, 318:14, 319:22  
**batch:** 259:18, 259:23, 260:4  
**begin:** 224:10, 259:12  
**beginning:** 201:16, 201:20, 202:8, 202:10, 224:12, 224:14  
**begins:** 201:23  
**behalf:** 276:18, 292:6  
**believe:** 223:7, 223:18, 225:22, 226:10, 249:22, 251:10, 252:20, 252:24, 254:6, 255:14, 259:9, 261:14, 262:10, 262:12, 266:14, 269:17, 270:15, 270:21, 270:21, 273:11, 273:18, 273:19, 273:24, 274:4, 278:13, 278:13, 279:15, 279:16, 280:1, 280:11, 280:17, 286:7, 292:12, 296:21, 299:16, 305:23, 316:11, 320:25, 321:3  
**believes:** 279:24, 288:10, 288:17  
**BellCore:** 302:17  
**BellSouth:** 194:6, 196:6, 198:9, 244:12, 244:14, 244:19, 244:23, 245:10, 245:18, 246:7, 247:5, 247:22, 249:2, 249:5, 249:12, 249:13, 249:14, 250:1, 250:6, 250:19, 253:8, 256:5, 256:16,

**anticipated:** 310:16  
**anticipating:** 265:8  
**anyway:** 263:19, 283:3  
**APA:** 320:16  
**apart:** 308:3, 308:15, 311:2  
**apologize:** 251:20, 316:10  
**appear:** 276:13, 320:10, 320:15  
**APPEARANCES:** 194:22  
**appears:** 199:23, 276:18, 312:14, 312:15  
**application:** 244:11  
**apples:** 309:18  
**appreciate:** 199:8  
**approach:** 295:15  
**appropriate:** 198:8  
**approximately:** 245:17, 257:2  
**arbitration:** 194:5, 259:3, 282:2, 292:20, 295:1  
**Architecture:** 246:14, 246:15, 257:9, 259:16  
**area:** 244:9, 244:10, 254:4  
**argue:** 247:23  
**argument:** 276:16, 306:16, 306:17  
**arguments:** 319:2  
**ascertain:** 253:17, 275:25, 305:10, 313:22  
**ascertained:** 275:23  
**asserted:** 272:9  
**assertions:** 272:18  
**Assessment:** 303:20, 303:22  
**associated:** 288:15, 292:6, 293:9, 309:20  
**assume:** 250:11, 267:5, 292:25, 307:4, 307:6, 307:12  
**assuming:** 258:2, 261:10  
**AT&T:** 247:6, 303:15, 303:16, 304:1, 304:11, 304:14, 305:11, 307:3, 307:8, 307:13, 317:20  
**AT&T's:** 317:23  
**ATIS:** 258:4  
**attached:** 201:5, 223:18, 225:8, 225:18, 225:21, 317:2  
**August 13th, 1999:** 271:3, 273:3  
**August 16th, 1999:** 201:1  
**August:** 262:12, 262:15, 300:19, 300:21, 304:13, 304:24, 305:4, 305:5, 306:3, 318:5  
**authenticate:** 313:24, 318:1, 318:21  
**authenticated:** 271:10, 318:8

256:18, 257:2, 257:4, 257:12, 258:13, 258:14, 258:25, 259:21, 260:8, 260:23, 261:8, 261:21, 263:24, 264:5, 264:11, 264:20, 265:4, 265:5, 265:23, 265:24, 266:5, 266:9, 266:15, 266:18, 267:1, 267:16, 267:19, 268:13, 268:16, 269:5, 269:23, 270:8, 271:1, 273:2, 273:3, 274:5, 274:9, 276:19, 276:24, 277:22, 278:3, 278:8, 278:11, 278:14, 279:2, 280:2, 280:3, 280:18, 281:12, 282:23, 283:4, 283:18, 283:21, 286:13, 286:23, 287:2, 288:19, 289:2, 289:8, 289:13, 290:4, 291:25, 292:6, 292:10, 292:13, 292:15, 292:20, 292:22, 292:25, 293:8, 293:10, 293:16, 295:2, 295:23, 296:20, 297:18, 298:4, 300:8, 301:8, 301:22, 302:6, 303:14, 304:2, 304:4, 304:7, 304:14, 304:23, 305:4, 305:8, 307:7, 307:9, 307:10, 307:13, 308:24, 309:2, 309:16, 310:2, 310:20, 311:21, 312:9, 314:11, 314:13, 316:21, 317:20, 317:25, 318:6, 319:2, 319:8, 319:10, 319:13, 319:18, 319:21  
**BellSouth's:** 199:1, 245:4, 247:6, 267:13, 268:19, 280:18, 280:25, 281:4, 282:6, 282:7, 282:18, 296:15, 296:23, 297:16, 297:20, 298:6, 298:11, 300:18, 301:1, 301:5, 301:25, 306:16, 314:20, 317:22  
**best:** 267:2, 299:17  
**Betty:** 194:17  
**beyond:** 254:1, 305:25  
**BFR:** 292:11  
**big:** 267:10, 280:10, 309:8  
**bill:** 267:12, 267:15, 267:15, 267:23, 267:24, 268:1, 269:21, 291:21, 291:22, 291:25, 292:3, 292:5, 292:8, 292:16, 292:16, 293:1  
**Billing:** 258:3, 291:23, 302:18  
**bit:** 253:12, 264:9, 269:24, 280:19  
**bits:** 267:8, 308:11  
**block:** 309:8  
**blocks:** 247:12  
**bolleplate:** 244:22, 244:24  
**Bona:** 292:11  
**bottom:** 202:4, 277:21  
**bought:** 245:24  
**break:** 293:22, 308:3  
**breakfast:** 199:17  
**breaking:** 305:17, 305:19, 307:16  
**breaks:** 296:23  
**BRIEF:** 294:6, 321:18  
**Briefly:** 287:9, 303:3, 311:9, 312:25

bring: 263;25, 296;22  
 broken: 308;22, 309;7, 309;10  
 Brokerling: 246;15  
 brought: 274;22  
 build: 246;8, 246;19, 246;20, 253;15  
 building: 247;2, 247;11, 253;12, 262;24  
 built: 253;5, 263;4, 299;22, 310;11  
 Business: 244;17, 244;24, 245;3, 250;18, 271;19, 272;10, 278;7,  
 291;20, 292;12, 293;15, 313;11, 318;25, 319;8, 320;17  
 buy: 254;19  
 bytes: 267;9

<C>  
 CALDWELL: 195;8, 197;18, 197;21, 197;25, 198;20, 295;6, 295;17,  
 295;19, 297;13, 297;25, 298;3, 299;18, 302;23  
 call: 200;4, 267;11, 294;2, 301;18, 301;19  
 called: 200;15, 246;14, 257;9, 287;3, 292;12  
 capabilities: 252;15, 297;21, 298;6, 298;11, 302;4, 315;2, 315;8,  
 315;16, 319;19  
 capability: 246;2, 246;6, 247;8, 249;7, 249;9, 251;17, 251;19, 253;8,  
 254;7, 254;9, 261;7, 273;16, 273;17, 273;18, 274;23, 290;19,  
 291;16, 292;23, 292;24, 293;9, 293;16, 297;16, 298;21, 296;22,  
 300;18, 300;22, 301;17, 304;5  
 capable: 301;2, 301;6, 302;1  
 carefully: 313;19  
 carriers: 256;7  
 cart: 319;11  
 case: 201;12, 253;13, 264;25, 292;20, 309;24  
 category: 303;24  
 cause: 263;23  
 caused: 200;25, 223;3, 223;14, 315;15  
 causes: 245;9  
 CCM: 303;20, 303;21, 303;21  
 CCR: 194;20  
 Center: 194;17, 300;5  
 certain: 194;5, 299;9, 308;4  
 Certainly: 199;13, 247;20, 250;15, 252;15, 256;13, 258;18, 262;6,  
 271;16, 271;17, 311;21, 320;2, 320;12  
 challenged: 319;7  
 Change: 196;6, 245;3, 245;5, 245;14, 247;5, 258;8, 256;10, 260;12,

close: 283;2, 304;10  
 closed: 224;6, 246;24  
 CN: 308;7, 308;9  
 code: 302;11, 314;16  
 collect: 267;10  
 colon: 201;17  
 comes: 287;17  
 Commenced: 194;16  
 comments: 247;7, 247;16  
 COMMISSION: 194;2, 244;5, 249;4, 265;23, 278;14, 279;5, 282;1, 282;4,  
 282;7, 282;16  
 Commission's: 201;11, 224;5, 224;20  
 COMMISSIONER: 194;13, 194;14, 197;3, 197;9, 197;20, 197;22, 198;1,  
 198;18, 198;24, 199;3, 199;8, 199;18, 199;20, 200;3, 201;7,  
 201;13, 202;19, 203;15, 203;19, 223;8, 223;12, 223;23, 224;8,  
 225;8, 225;16, 225;24, 226;2, 226;5, 226;9, 226;12, 226;17,  
 247;13, 247;18, 247;19, 247;25, 248;6, 248;8, 248;12, 250;25,  
 251;2, 251;3, 253;23, 254;3, 254;12, 255;2, 255;8, 255;11, 255;17,  
 255;19, 255;23, 257;22, 258;5, 258;9, 258;12, 258;16, 258;19,  
 259;6, 259;10, 259;25, 260;5, 260;8, 262;20, 263;6, 263;18, 264;2,  
 264;18, 264;24, 265;11, 265;13, 265;20, 266;8, 269;2, 270;5,  
 270;9, 270;11, 272;2, 272;16, 272;21, 274;15, 274;20, 275;14,  
 276;2, 276;11, 276;15, 279;12, 283;6, 285;5, 285;13, 285;19,  
 293;21, 294;1, 294;4, 294;7, 295;4, 297;5, 297;10, 297;25, 299;14,  
 302;24, 302;24, 302;25, 303;1, 305;21, 306;1, 306;7, 306;10,  
 307;25, 309;13, 309;25, 310;5, 310;6, 310;14, 310;22, 310;25,  
 311;4, 311;7, 311;8, 311;9, 311;13, 312;2, 312;7, 312;11, 312;12,  
 313;9, 314;1, 315;10, 315;13, 315;25, 316;10, 316;14, 316;18,  
 316;22, 317;3, 317;6, 317;8, 317;11, 317;13, 317;16, 318;9,  
 318;13, 318;19, 318;22, 318;24, 320;6, 320;9, 320;22, 321;2,  
 321;6, 321;8, 321;10, 321;12, 321;16  
 commit: 292;21  
 committed: 265;24, 266;1, 267;16, 267;19, 276;24  
 Committee: 258;13, 258;14, 260;12, 260;15, 260;21  
 Common: 246;14, 306;11  
 Communications: 194;5, 258;5  
 companies: 244;22  
 company: 253;7, 256;3, 314;19  
 compared: 291;11  
 compensated: 273;19, 273;20, 279;3

260;15, 303;14, 303;17, 303;19, 303;23, 303;24, 304;15, 304;16,  
 312;9, 314;11, 314;14, 314;20  
 changed: 202;2  
 changes: 244;18, 245;6, 245;8, 250;18, 256;19, 257;14, 258;15, 284;5,  
 314;12  
 characterization: 253;11  
 characters: 308;11, 308;16  
 charge: 290;9, 293;8, 293;11  
 charges: 288;9, 288;15, 288;20, 290;21, 291;17, 291;25, 292;5, 302;8  
 check: 251;10, 261;19, 263;25, 265;7, 277;19, 287;20, 287;21, 290;17,  
 290;24, 291;1, 291;4, 296;6  
 checked: 299;10  
 checks: 302;1  
 choice: 259;17, 263;1  
 chooses: 261;12  
 chose: 302;13  
 citation: 282;24  
 cite: 261;22  
 claim: 261;24  
 clarified: 255;20  
 clarity: 320;1  
 CLARK: 194;13, 197;3, 197;9, 197;20, 197;22, 198;1, 198;16, 198;24,  
 199;8, 199;20, 200;3, 201;7, 201;13, 203;19, 223;8, 223;12, 224;8,  
 225;16, 225;24, 226;2, 226;5, 226;9, 226;12, 226;17, 247;13,  
 247;18, 247;25, 248;6, 248;8, 248;12, 251;2, 251;3, 253;23, 254;3,  
 254;12, 255;2, 255;8, 255;11, 255;17, 255;19, 255;23, 266;6,  
 269;2, 270;5, 270;9, 270;11, 272;2, 272;16, 272;21, 274;15,  
 274;20, 275;14, 276;2, 276;15, 279;12, 283;6, 285;5, 285;19,  
 293;21, 294;1, 294;4, 294;7, 295;4, 297;5, 297;10, 297;25, 299;14,  
 302;24, 303;1, 306;1, 306;7, 306;10, 307;25, 309;13, 309;25,  
 310;5, 310;6, 311;8, 311;13, 312;7, 312;12, 314;1, 315;10, 315;25,  
 316;14, 316;18, 316;22, 317;3, 317;6, 317;8, 317;11, 317;13,  
 317;16, 318;9, 318;13, 318;19, 318;22, 320;6, 320;9, 320;22,  
 321;2, 321;6, 321;8, 321;10, 321;16  
 clear: 226;13, 253;23, 265;16, 285;21, 288;2, 318;14  
 clearly: 271;24, 275;24, 276;9, 294;25, 318;25  
 CLEC: 253;8, 258;14  
 CLECs: 246;2, 249;8, 249;18, 249;22, 250;21, 284;11, 314;12  
 click: 263;21  
 clock: 254;20, 254;20

competition: 256;8  
 compiled: 197;12  
 complete: 249;19, 284;7, 284;12  
 completely: 259;15  
 complicated: 246;11, 263;1, 263;4  
 COMPLIED: 279;18  
 compliment: 306;22  
 Composite: 197;11, 312;17  
 compound: 285;16  
 concentrating: 253;6  
 concept: 256;2  
 concern: 252;14  
 concerned: 308;24  
 concerning: 262;4  
 concludes: 250;24  
 concluding: 224;13  
 Conference: 194;17  
 confidential: 226;6, 291;8, 297;2  
 confirm: 264;21  
 confused: 318;1  
 connected: 225;12  
 consequently: 256;19  
 consider: 199;5  
 considered: 201;12, 226;15  
 considering: 203;8, 224;18  
 consistency: 258;23  
 consistent: 249;23, 250;22, 275;20, 280;15, 280;17, 282;5, 284;18,  
 285;10, 285;17, 285;18, 265;20, 286;4, 294;16  
 consists: 312;10  
 consultants: 245;23, 248;16  
 consumer: 244;15  
 contained: 203;11, 225;1  
 contending: 266;3, 269;13  
 contents: 263;4, 283;16  
 context: 258;20  
 continue: 245;6, 256;18, 272;22, 314;2  
 continued: 321;19  
 continues: 257;15  
 Continuing: 201;14, 203;5, 223;1, 223;13, 224;16, 244;1, 248;15,  
 254;22, 255;25, 260;6, 265;21, 268;4, 268;11, 269;3, 270;17,

272:23, 273:22, 275:5, 276:22, 279:13, 283:10, 285:25, 290:16,  
291:9, 294:17, 295:19, 297:13, 298:3, 299:18, 303:5, 306:18,  
308:17, 310:7, 311:11, 312:18, 314:5, 315:6, 315:14, 316:6  
contract: 249:12, 250:22, 250:24, 286:6, 287:13, 295:1  
contrary: 247:3  
Control: 258:8, 260:12, 260:15, 314:14  
conversation: 309:17  
conversations: 270:22  
converts: 300:6  
copy: 197:13, 265:6, 265:10, 266:15, 266:21, 295:16, 307:19, 307:20  
CORBA: 246:15, 257:9  
Correct: 200:1, 200:2, 200:7, 200:8, 201:3, 201:6, 202:18, 223:20,  
223:21, 223:25, 224:1, 224:7, 225:12, 225:20, 251:15, 251:23,  
252:1, 252:4, 252:11, 252:21, 254:25, 255:19, 257:21, 259:16,  
260:11, 260:16, 261:5, 261:10, 262:8, 262:13, 263:11, 264:9,  
264:12, 264:22, 265:17, 266:2, 266:3, 266:6, 267:17, 268:5,  
277:18, 278:12, 279:25, 280:1, 281:17, 282:12, 284:7, 284:12,  
286:24, 286:25, 287:4, 288:18, 288:21, 288:24, 296:12, 296:13,  
297:16, 297:17, 298:23, 298:24, 300:25, 303:7, 303:11, 303:12,  
307:17, 308:8, 310:16, 315:3, 315:4, 316:7, 317:2, 317:3  
corrections: 203:7, 224:22  
correctly: 251:20  
correspondence: 268:11, 268:12, 268:15, 271:19, 271:25, 272:11, 276:7  
Cost: 249:5, 250:20, 250:21, 266:8, 266:16, 273:25, 274:7, 274:22,  
276:12, 277:24, 278:21, 290:18, 290:20, 292:23  
costs: 279:5, 279:9  
counsel: 268:19, 269:10, 271:15, 277:8  
count: 280:9  
couple: 248:22  
course: 320:17  
COURT: 197:15, 294:10, 294:13, 294:22  
cover: 257:24, 317:21  
create: 290:8  
CROSS EXAMINATION: 195:7, 195:8, 195:8, 198:10, 196:25, 251:1, 251:4,  
270:7, 295:5, 297:11, 303:4  
cross: 297:7, 303:2, 305:23, 305:23, 316:2  
CSR: 202:1, 202:5, 202:16, 202:21, 246:23, 247:3, 247:8, 247:17,  
263:17, 263:18, 296:19, 296:19, 296:22, 298:18, 303:11, 303:19,  
304:2, 305:15, 305:16, 306:9, 306:9, 306:12, 307:15, 308:6,  
308:21, 308:23, 309:19, 309:21, 310:21, 311:2, 316:3, 320:15

deliver: 304:2, 304:4  
delivered: 260:3, 304:11  
delivery: 304:10  
DeltaCom: 198:10, 251:24, 252:2, 252:7, 256:2, 256:5, 256:19, 260:9,  
260:17, 260:19, 261:1, 265:24, 265:25, 266:1, 266:5, 267:4,  
268:13, 269:18, 271:2, 273:2, 273:4, 273:24, 274:6, 277:10,  
277:23, 277:24, 278:5, 278:19, 279:5, 279:10, 279:24, 280:19,  
261:13, 281:14, 282:1, 286:23, 287:2, 288:3, 288:5, 288:8, 288:10,  
288:14, 288:17, 289:6, 289:7, 289:22, 290:9, 290:18, 291:15,  
291:24, 292:7, 292:10, 293:13, 293:15, 294:18, 318:4  
DeltaCom's: 261:15, 267:20, 279:7, 281:6  
delve: 258:17  
department: 269:21, 270:2, 290:1, 290:2, 314:17, 314:19  
deposition: 297:14, 298:20, 300:17  
depositions: 197:10, 296:5, 296:8, 296:9, 320:5  
describe: 312:24, 313:8, 314:8, 314:9, 319:22  
description: 268:14, 303:25, 305:10  
desires: 267:4, 274:7, 309:11  
desk: 266:23  
detail: 269:11  
detailed: 287:12, 289:21, 292:3  
details: 287:14  
determine: 244:25, 269:22  
determining: 266:25, 267:2  
develop: 245:21, 254:17, 257:16, 259:8, 261:4, 273:16, 273:16, 289:2,  
304:8, 314:16  
developed: 256:5, 260:20  
developer: 245:22  
developing: 249:5, 249:7, 250:20, 252:14, 254:16, 256:6, 292:24,  
293:9  
Development: 244:11, 248:4, 253:19, 253:20, 254:15, 259:12, 273:25,  
274:8, 277:24, 290:18, 291:16, 292:13  
developments: 260:10  
different: 259:16, 268:2, 270:16, 294:21, 321:13  
differently: 249:18  
difficult: 198:12  
diligent: 253:13  
DIRECT EXAMINATION: 195:6, 200:18  
Direct: 195:6, 201:2, 201:9, 201:16, 203:8, 225:22, 244:3, 248:14,  
283:12, 316:16, 317:2

CSRs: 201:18, 309:6, 310:16, 310:17, 315:17  
Customer: 201:18, 245:11, 247:10, 249:15, 249:16, 249:17, 250:2,  
263:14, 263:16, 280:6, 280:6, 283:23, 284:3, 286:24, 289:16,  
290:1, 305:17, 305:20, 308:5, 308:7, 308:10, 308:12, 308:21, 309:6  
customer's: 284:6  
customers: 245:10, 265:19, 292:17  
customers': 248:25  
customized: 299:21, 299:22  
cut: 307:23

<D>

d/b/a: 194:5  
Data: 244:21, 244:25, 248:23, 249:6, 251:16, 251:19, 252:3, 257:3,  
261:19, 267:8, 267:9, 273:17, 291:6, 300:5, 307:21, 307:22, 308:3,  
308:20, 309:6, 309:10  
database: 251:25, 261:1, 261:2, 261:22, 262:2, 262:3, 263:10, 265:2,  
265:7, 266:2, 266:6, 266:10, 266:20, 266:22, 267:4, 267:6, 267:7,  
267:14, 267:21, 273:5, 274:2, 274:2, 274:7, 274:24, 278:6, 278:22,  
307:17  
databases: 267:12, 301:23  
DATE: 194:15, 257:13, 303:16, 303:17, 305:1  
dated: 196:4, 268:20, 269:6, 270:12, 277:14  
David: 202:12  
day: 199:22, 285:7  
days: 244:17, 245:12, 250:17, 264:17, 277:12  
deal: 223:9, 278:7, 286:16, 314:2  
dealing: 286:22  
December: 300:22  
decide: 249:4, 270:2  
decipher: 302:11  
define: 249:17, 249:18, 282:4, 284:10, 264:11, 284:14, 284:15, 286:5,  
286:5  
defined: 279:22  
defines: 280:21, 286:13  
definition: 249:10, 249:11, 250:21, 255:5, 279:21, 279:24, 280:4,  
280:13, 280:16, 280:18, 280:25, 281:2, 281:4, 281:15, 281:20,  
282:2, 282:5, 282:11, 282:18, 283:4, 283:17, 284:18, 284:23,  
285:8, 285:10, 285:23, 286:4, 286:6, 286:7, 308:18  
definitions: 249:23  
deleted: 201:19, 201:21, 202:1, 202:6, 202:21

directive: 245:20  
directly: 283:22, 283:23, 284:2, 284:3  
director: 244:8  
disagree: 272:12, 313:13  
disbelief: 247:4  
discovering: 305:24  
discrepancy: 260:1  
discuss: 248:20, 279:20  
discussed: 274:23, 275:4, 278:10, 292:19, 314:10, 318:3  
discussing: 271:1  
DISCUSSION: 223:11, 277:21, 291:7, 319:24  
discussions: 266:18, 275:10  
dispute: 288:13  
doc: 319:6  
DOCKET: 194:4, 201:1  
DOCUMENT: 268:25, 277:1, 295:18, 303:16, 304:18, 304:24, 305:4,  
306:3, 306:6, 308:15, 308:16, 310:2, 311:14, 311:20, 312:3, 312:9,  
312:19, 313:8, 313:10, 313:18, 313:18, 313:24, 317:19, 317:23,  
318:1, 318:7, 318:12, 318:17, 318:21, 318:24, 319:5, 319:6,  
319:24, 319:25  
documents: 312:1, 312:20, 312:20, 312:25, 313:1, 314:8, 314:10,  
314:23, 315:1  
doing: 253:20, 278:1, 291:20, 309:3, 310:1  
dollars: 266:17, 267:19, 287:24  
done: 245:25, 246:4, 254:18, 278:4, 278:7, 309:14, 309:14, 309:16,  
314:13  
double: 319:14  
down: 201:20, 265:16, 284:14, 286:3, 294:20, 305:17, 305:19, 307:16,  
308:22, 309:7, 309:10  
download: 248:21, 249:3, 249:6, 249:7, 250:18, 250:20, 251:8, 252:19,  
260:25, 261:5, 261:12, 261:16, 265:1, 265:25, 266:9, 266:19,  
267:20, 268:17, 268:21, 269:19, 271:2, 273:4, 273:13, 273:17,  
273:18, 273:25, 274:19, 274:25, 275:17, 278:6, 278:11, 278:15,  
278:21, 278:25, 295:24  
downstream: 265:18, 284:8, 284:13  
dragging: 253:12  
drive: 199:6  
duly: 200:16  
during: 266:12, 278:5

## &lt;E&gt;

e-mail: 245:12  
 earlier: 258:11, 274:3, 275:13, 275:21, 276:24, 294:16, 297:7, 299:5  
 early: 199:16, 199:16, 271:3, 302:3  
 Easley: 194:17  
 eat: 287:21, 287:22  
 ECCIP: 304:19  
 economy: 276:12  
 EDI: 244:20, 245:18, 245:21, 245:22, 245:25, 246:3, 246:12, 253:6, 253:8, 253:9, 257:2, 257:8, 258:20, 259:14, 259:18, 259:22, 261:24, 262:25, 263:5, 296:20, 299:21, 299:21, 299:24, 300:1, 300:6, 300:12  
 EDWARDS: 196:4, 197:5, 197:8, 269:8, 269:15, 269:21, 270:12, 270:19, 271:14, 271:15, 271:17, 278:9, 317:9  
 efficient: 199:13  
 effort: 252:25, 253:16  
 efforts: 253:14, 256:3  
 EICCP: 259:5, 260:11, 304:15, 304:17, 307:5  
 either: 246:17, 247:8, 296:23, 307:10  
 elaborate: 264:8  
 Electronic: 244:11, 244:20, 245:19, 249:20, 250:16, 257:3, 257:6, 257:25, 258:5, 258:7, 261:4, 261:16, 261:21, 283:19, 283:24, 284:4, 287:3, 289:1, 308:13, 308:15, 314:13, 314:14, 317:23  
 electronically: 244:18, 245:7, 245:9, 289:4  
 employed: 200:23  
 employees: 246:18  
 encompass: 257:25  
 end: 267:15, 302:11  
 end-user: 283:23, 284:2  
 ending: 202:9  
 enhancements: 258:15  
 enough: 246:10, 290:15  
 enter: 250:2, 299:24, 299:25, 307:6  
 entered: 265:14  
 enters: 289:8  
 entirely: 224:1  
 entitled: 297:7  
 entry: 290:4  
 envision: 263:12  
 equipment: 245:24

experts: 266:19  
 explain: 273:11, 296:17, 311:15  
 explained: 274:23, 287:9, 293:8, 293:10  
 extent: 271:10, 275:2, 276:5, 281:4, 281:8

## &lt;F&gt;

face: 310:22, 320:1  
 facilities: 248:24  
 fact: 246:1, 247:5, 259:2, 280:4, 286:1, 289:23, 305:13  
 factors: 315:15  
 Fair: 249:4, 250:19, 273:11, 274:2, 279:2, 279:2, 290:15, 294:10, 296:22, 306:7  
 fairly: 273:15  
 familiar: 286:17  
 far: 253:7, 254:9, 261:9, 319:4  
 FCC: 280:19, 280:21, 281:8, 281:9, 281:19, 262:3  
 FCC's: 280:16, 281:2, 281:6, 282:11, 263:4, 283:17, 284:16, 284:23, 285:10, 285:23, 286:3  
 features: 259:13, 309:20, 309:22  
 feel: 198:7  
 feet: 253:12  
 few: 274:14, 277:12  
 Fide: 292:11  
 field: 245:1, 264:7  
 file: 307:18  
 filed: 226:8, 248:9, 292:20  
 files: 308:22, 309:6  
 filled: 306:19, 307:3, 307:8, 307:9, 317:20, 318:6  
 find: 250:19, 274:6, 262:22  
 fine: 295:17  
 finish: 199:23, 262:20  
 finished: 297:11  
 First: 200:16, 201:17, 202:15, 244:16, 246:2, 246:3, 251:8, 261:6, 262:1, 270:25, 272:12, 284:22, 295:9, 301:4, 304:12  
 five: 277:2, 264:23, 293:22, 294:4, 321:11  
 flipping: 263:2, 286:16  
 FLORIDA: 194:2, 194:19, 244:15, 282:1, 282:16  
 Florida's: 255:22  
 flow-through: 249:11, 249:12, 249:14, 249:14, 250:21, 255:5, 279:15, 279:21, 280:4, 260:5, 260:14, 280:16, 260:18, 280:22, 261:1,

Errata: 197:10, 198:4  
 error: 264:12, 264:13, 264:15, 264:16, 302:1  
 errors: 249:1, 264:10, 265:16  
 Esplanade: 194:16  
 establish: 313:23, 319:12  
 established: 313:7  
 estimate: 198:9, 198:11, 198:14, 198:25, 246:20, 267:1, 275:6  
 estimated: 250:3, 252:21  
 estimates: 199:7  
 estimation: 253:2  
 evaluation: 305:9  
 eventually: 244:15  
 everybody: 273:20  
 everyday: 267:11, 269:23  
 evidence: 271:12, 272:4, 272:5, 272:10, 319:3, 319:4, 319:23, 319:25, 320:12, 320:16  
 evolution: 258:20  
 evolved: 258:11  
 evolving: 256:8, 256:9, 256:10, 256:11, 256:14, 256:16, 257:5, 257:6, 257:18  
 exactly: 287:3, 277:4, 297:24, 306:6  
 examined: 200:16  
 example: 257:15, 259:21, 267:16, 296:24, 296:25  
 exception: 257:7, 276:9, 313:11  
 exchange: 244:23, 307:1  
 exchanging: 302:16  
 Excuse: 201:4, 202:4, 224:17, 226:1, 277:25, 300:11  
 excused: 320:21, 320:22  
 Exhibit 15: 197:12, 198:5  
 Exhibit 16: 226:8, 316:23, 316:25  
 Exhibit 17: 270:11, 270:23, 273:1, 275:6, 275:8, 275:24, 317:9  
 Exhibit 18: 312:6, 312:17, 317:13  
 exhibit I: 271:8  
 exhibit: 197:11, 197:23, 201:4, 223:18, 225:8, 225:11, 225:14, 226:8, 270:6, 270:8, 296:25, 316:20  
 EXHIBITS: 198:1, 196:3, 201:5, 225:18, 225:21, 317:1, 317:5  
 expect: 256:17, 256:23  
 expedite: 282:24  
 expert: 276:13, 290:5, 315:20, 315:23, 319:17  
 expertise: 245:22, 246:12, 246:17

281:9, 261:15, 261:20, 282:3, 262:5, 262:12, 282:19, 265:11  
 flows: 283:5, 283:19  
 FOCs: 297:3  
 focus: 265:22  
 follow: 260:7  
 follows: 200:16  
 footnotes: 226:14  
 Form: 196:6, 303:14, 304:16, 306:17, 306:19, 307:3, 307:5, 312:9, 314:11, 314:12, 314:19, 315:1, 315:1, 315:7, 315:16, 315:23, 317:22, 319:8  
 formal: 247:5  
 format: 263:22, 300:6, 302:12, 302:20  
 formats: 302:18  
 formatted: 302:6, 302:10, 308:4, 309:19  
 formatting: 264:6  
 forth: 266:12  
 Forum: 256:3, 313:1, 314:9, 319:1, 319:1  
 forward: 197:25, 278:20, 279:9  
 four: 246:3, 284:22, 289:19  
 frame: 254:11, 254:15, 297:4  
 frames: 196:6  
 free: 287:22  
 front: 281:22, 282:15, 298:15  
 full: 199:22, 200:20  
 function: 262:23, 301:19, 301:20  
 functionality: 301:21, 303:19, 304:3, 304:9, 304:11  
 functions: 299:6, 299:8, 299:20, 300:10, 301:3, 301:7, 301:10, 301:10, 301:11, 301:13, 301:14  
 fundamental: 247:9, 291:20

## &lt;G&gt;

gained: 246:12  
 Gateway: 246:9, 249:20, 252:8, 254:19, 305:12  
 gave: 311:3  
 generate: 290:8  
 generated: 245:15  
 generation: 264:9, 284:13  
 gets: 197:6, 265:5, 291:5  
 getting: 264:3, 278:6, 278:11, 263:2, 315:25  
 Give: 199:2, 264:14, 267:5, 268:14, 283:6, 283:7, 285:5, 286:19,

287:21, 287:23  
 given: 203:17, 308:18, 309:1, 309:16  
 gives: 301:18  
 global: 256:1  
 GOGGIN: 224:1, 224:7, 224:9  
 gotten: 261:9, 317:24  
 grab: 264:19, 265:2  
 granted: 271:21  
 groundwork: 253:22  
 group: 257:23, 260:17, 293:14, 313:6  
 guess: 197:14, 198:8, 199:16, 202:23, 253:17, 256:1, 256:21, 258:2,  
 271:8, 276:6, 276:9, 276:12, 277:20, 278:2, 280:21, 300:2, 303:8,  
 315:25  
 Guide: 248:23, 251:12, 295:24  
 guidelines: 304:4  
 guy: 278:3

<H>  
 half: 198:14, 198:15, 198:16, 198:21, 198:23  
 hand: 197:13, 287:5, 287:18  
 handed: 269:4, 311:15  
 handing: 311:14  
 handle: 225:15  
 hang: 223:8  
 happen: 288:16  
 happened: 318:5  
 hardware: 291:21  
 head: 307:2  
 headed: 312:9  
 heads: 199:24  
 hear: 247:22, 261:25, 262:1, 264:23, 270:18  
 heard: 270:14, 270:19, 276:23, 290:23, 291:1  
 HEARING: 194:12, 277:13, 277:18, 316:1  
 hearsay: 271:11, 272:4, 272:5, 272:9, 272:13, 276:8, 276:18, 313:12,  
 313:20, 318:9, 318:10, 318:14, 318:15, 319:15, 320:11  
 help: 279:9  
 helps: 255:8  
 heretofore: 194:23  
 high: 291:12  
 Highlight: 307:19

Inc: 194:5, 194:7  
 Include: 279:25, 281:10, 281:12, 281:16  
 Included: 224:19, 250:23, 280:14, 282:11, 282:14  
 Includes: 278:25, 281:20, 282:6, 286:7, 286:11  
 Including: 244:12, 271:2  
 Inclusion: 319:24  
 Incumbent: 256:7  
 incur: 290:20  
 Independent: 277:5, 305:9, 306:4  
 Indicate: 223:22, 255:12  
 Indicated: 252:7, 252:20, 252:24, 275:18, 278:10  
 INDICATIONS: 320:8  
 Industry: 256:9, 256:10, 257:15, 257:17, 257:23, 303:23, 303:24,  
 304:3, 319:1  
 Industry-standard: 302:17  
 Information: 201:22, 202:7, 202:23, 202:24, 244:8, 244:23, 247:10,  
 250:7, 250:10, 250:13, 250:23, 251:21, 261:23, 262:5, 262:8,  
 265:4, 269:19, 283:22, 284:6, 286:23, 289:4, 291:8, 293:2, 293:4,  
 296:23, 297:9, 300:6, 302:18, 305:17, 305:19, 306:5, 307:16,  
 308:21, 309:11, 309:25, 311:18  
 Informed: 277:10, 286:24  
 Infrastructure: 244:10  
 Initiates: 289:8  
 Input: 260:9, 260:19, 260:21, 265:15  
 inputs: 283:23, 284:3  
 insert: 225:16  
 Inserted: 195:6, 195:7, 203:20, 225:6  
 Instance: 264:10, 308:5  
 Institutes: 258:25  
 Integratable: 296:20, 296:21  
 Integrate: 246:5, 253:14, 298:14, 300:14  
 Integrated: 245:16, 248:3, 298:22  
 Integrating: 301:2, 301:6  
 Integration: 247:20, 298:15  
 Intensive: 280:8  
 Intention: 272:7  
 Interchange: 244:21, 257:3  
 Interconnection: 194:8, 258:1, 269:25, 280:14, 281:1, 282:15, 292:19  
 Interest: 276:11  
 Interested: 278:1, 278:16

hire: 254:18  
 hits: 301:21  
 hoc: 258:24  
 holding: 257:12  
 holds: 287:18  
 honest: 294:19  
 Honor: 200:2, 225:5, 247:19, 248:10, 268:23, 271:4, 295:15  
 hope: 256:11, 256:13, 256:14, 256:21, 262:6, 262:8, 306:23  
 hopefully: 262:10, 263:16  
 hoping: 256:17, 300:15  
 horse: 319:12  
 hour: 198:14, 198:15, 198:16, 198:17, 198:21, 198:23  
 hours: 225:9, 274:14, 289:19, 289:19, 289:19, 293:4  
 housekeeping: 311:13  
 HTML: 307:21, 307:21  
 hundred: 277:2, 287:19, 287:24  
 HYDE: 198:17, 198:22, 321:8, 321:9  
 Hypothetically: 291:14

<I>  
 ID: 196:2  
 Idea: 290:10, 290:14  
 Identified: 226:3  
 Identify: 225:25, 226:2, 312:3, 312:8  
 Ignoring: 249:20  
 ILEC: 244:12, 254:19, 305:12  
 Imagine: 198:2  
 Immediately: 201:16, 263:5, 313:17  
 Impact: 303:20  
 impacted: 303:22  
 Implement: 263:3  
 Implementation: 252:25, 260:23, 304:9  
 Implementing: 253:4, 304:6  
 Imply: 263:4  
 Important: 197:14, 306:11  
 Improper: 313:25  
 Improve: 256:18  
 Improved: 256:24, 256:25  
 Improvements: 257:14  
 Inadvertent: 264:5

Interface: 245:19, 245:20, 245:21, 246:1, 246:19, 247:24, 248:3,  
 252:4, 252:9, 257:3, 257:4, 257:6, 257:12, 258:7, 258:21, 259:13,  
 262:25, 263:1, 283:24, 284:4, 296:9, 298:4, 298:9, 299:19, 300:9,  
 301:2, 301:5, 301:13, 303:22, 307:20, 314:14, 315:3  
 Interfaces: 244:11, 256:5, 256:18, 256:20, 257:15, 258:1, 260:20,  
 263:2, 263:3, 296:18, 297:19, 300:1, 314:13  
 Interim: 246:22, 252:9  
 Interrupt: 247:25  
 Interrupted: 255:2  
 Intervals: 265:19  
 Introduce: 313:18  
 Invalid: 249:1  
 Involved: 250:8, 269:23, 269:24, 275:3, 275:10, 278:24, 279:1,  
 291:15, 292:24  
 Issue: 224:4, 225:12, 245:11, 245:15, 246:24, 247:15, 247:20, 248:2,  
 248:16, 249:10, 249:25, 251:8, 251:9, 252:6, 255:7, 255:12,  
 255:15, 255:15, 255:21, 255:22, 255:22, 259:2, 260:25, 266:7,  
 266:13, 267:10, 272:1, 273:7, 273:12, 274:13, 274:19, 279:8,  
 279:14, 279:16, 279:21, 286:16, 287:5, 287:6, 287:25, 288:7,  
 288:13, 289:25, 295:9, 295:13, 295:20, 296:2, 310:17, 310:19  
 Issues: 194:6, 224:5, 224:9, 224:22, 250:4, 250:17, 262:3, 270:1,  
 300:3  
 ITC: 298:14, 297:15, 297:19, 298:4, 298:9, 298:10, 298:21, 299:5,  
 299:19  
 ITC's: 302:9  
 ITC^DeltaCom: 194:4, 194:5, 194:6, 198:25, 200:15, 200:24, 244:9,  
 244:15, 244:23, 249:11, 250:1, 276:14  
 ITC^DeltaCom's: 245:4  
 Item: 201:17  
 Itemized: 268:1, 291:21, 302:7  
 Items: 282:9  
 Itself: 249:6, 249:14, 251:18, 257:12, 273:17, 286:20, 292:14,  
 292:16, 320:3

<J>  
 JACOBS: 194:14, 199:18, 202:19, 225:8, 257:22, 258:5, 258:9, 258:12,  
 258:16, 258:19, 259:6, 259:10, 259:25, 260:5, 260:8, 262:20,  
 263:6, 263:18, 264:2, 264:18, 264:24, 265:11, 265:13, 265:20,  
 302:24, 302:25, 310:14, 310:22, 310:25, 311:4, 311:7  
 JIII: 303:18, 312:14

Jordan: 196;5, 269;5, 270;13, 271;12  
 JR: 194;14  
 Judicial: 276;12

<K>

keep: 248;8, 262;10, 286;24  
 kept: 199;11  
 key: 263;13  
 keying: 249;18, 263;15  
 kick: 264;4, 264;11  
 Kind: 263;6, 297;8  
 knowledge: 246;13, 274;5, 274;10, 275;19, 279;7, 279;8, 282;13,  
 293;11, 293;13, 293;15, 293;19, 294;18, 298;19, 303;7, 306;5,  
 308;19, 310;9, 311;22, 313;7, 313;16, 313;21, 313;23, 315;21,  
 317;19, 317;25  
 known: 292;11  
 knows: 275;23, 297;8

<L>

L&P: 246;2  
 labor: 250;8, 287;10  
 language: 310;15  
 large: 267;14, 267;15, 274;24, 297;2  
 last: 245;8, 247;1, 248;7, 293;25, 294;8, 299;9, 302;5, 312;15  
 late: 199;15, 199;22  
 Late-filed: 197;18, 197;23, 198;5  
 later: 261;3, 264;4, 265;4, 265;16  
 laying: 253;22  
 lead: 315;12  
 leading: 315;5  
 learn: 247;1  
 learning: 256;7  
 least: 320;2  
 leaves: 280;10  
 led: 319;2  
 left: 275;1, 286;13  
 lengthy: 319;23, 321;1, 321;4  
 LENS: 252;4, 252;5, 252;10, 296;19, 296;19, 298;16, 298;22, 298;23,  
 299;4, 299;5, 299;8, 299;12, 300;15, 303;23, 307;18, 309;9  
 LEON: 194;14

marked: 223;19, 225;14, 270;6, 271;8, 320;4, 320;4  
 market: 256;4  
 material: 250;7, 250;23, 287;6, 287;8, 287;11, 288;9, 288;15, 288;20,  
 290;9, 290;21, 291;17, 292;5, 302;7  
 materials: 292;1, 292;2, 292;3, 302;6  
 math: 277;13  
 matter: 271;1, 272;9, 288;8  
 MCI: 270;15, 270;22, 278;10, 278;15, 278;16  
 mean: 250;7, 255;5, 259;19, 273;8, 285;24, 292;16, 307;23, 308;1,  
 308;2, 319;14  
 means: 250;16, 289;1, 299;22, 308;9, 306;12, 308;3  
 meant: 298;7  
 measure: 281;5  
 measures: 249;14  
 mechanism: 301;17, 304;16  
 mechanized: 284;8, 284;13  
 media: 302;8  
 meeting: 199;20, 273;2, 307;5, 318;5  
 meetings: 311;24, 314;18, 318;2  
 member: 304;18, 314;15  
 memory: 296;8  
 mentioned: 276;23, 278;9, 282;10, 296;2  
 METZKE: 194;20  
 MICHAEL: 195;5, 200;4, 200;14, 200;22, 200;25, 223;2, 223;14  
 Microsoft: 257;19, 308;14  
 mid: 305;4  
 middle: 201;22  
 Mike: 244;7, 308;8  
 Millions: 267;8, 267;8, 267;9, 267;9, 267;10, 267;11  
 minute: 223;9, 245;8, 282;21, 315;10  
 minutes: 259;21, 293;22, 294;5, 321;11  
 mirrors: 281;2  
 missed: 202;17, 301;4  
 missing: 264;6  
 mistaken: 310;14  
 Mister: 306;20  
 mistype: 264;6  
 modifications: 203;7, 224;22, 257;14  
 modifying: 258;25  
 moment: 201;8, 258;17

less: 198;23, 277;14  
 Letter: 196;4, 268;19, 269;5, 269;9, 269;16, 270;12, 270;24, 270;24,  
 271;5, 271;8, 271;7, 271;9, 271;11, 271;16, 271;21, 272;6, 272;8,  
 272;9, 275;11, 276;4, 276;17, 276;19, 277;5, 277;8, 304;13, 317;9  
 level: 261;11  
 likes: 311;25  
 limitation: 299;10, 299;14, 310;23  
 limitations: 299;11  
 limited: 298;19, 303;6, 303;9, 305;23, 315;21  
 Line: 201;16, 201;20, 201;22, 201;23, 201;24, 202;5, 202;8, 202;9,  
 202;10, 202;11, 202;20, 202;22, 203;1, 203;2, 203;3, 203;3,  
 224;10, 224;11, 224;12, 224;13, 224;14, 224;17, 249;16, 255;12,  
 277;21, 280;7, 283;9, 283;15, 283;16, 292;8, 293;2, 309;21, 309;22  
 Lines: 198;21, 202;15, 299;12, 309;21  
 List: 245;1, 255;22, 288;14  
 listing: 291;25  
 literally: 287;8  
 little: 245;25, 248;11, 253;12, 264;9, 269;24, 278;15, 280;19, 300;2  
 local: 244;9, 256;4, 256;8, 277;8  
 logical: 252;18, 253;14  
 long: 253;3, 285;18, 277;15, 277;16, 285;7  
 look: 199;5, 286;24, 269;4, 286;4, 298;7, 304;5  
 looked: 274;25  
 looking: 252;12, 253;3, 254;23, 263;10, 270;23, 302;3, 308;9, 310;1  
 looks: 308;6  
 lots: 302;17  
 Louisiana: 268;14, 269;11, 277;8, 277;13, 277;16, 277;17  
 low: 290;11, 290;17, 291;2, 291;12, 291;14  
 LSR: 249;19, 280;10

<M>

ma'am: 300;11  
 magnetic: 302;8, 302;19  
 maintenance: 249;25, 250;22  
 major: 303;21  
 man: 293;4  
 manipulating: 284;6  
 manner: 260;2, 288;9, 288;16, 296;11  
 Mantis: 305;13, 309;18  
 mark: 197;11, 197;11, 226;5, 270;11, 312;16

month: 277;14  
 monthly: 266;1, 267;21, 271;3, 273;5, 273;14, 278;21  
 months: 248;21, 253;1, 253;18  
 move: 197;18, 225;5, 225;13, 252;7, 316;12, 316;19, 316;23, 317;4,  
 317;10, 317;14  
 moved: 320;5  
 moving: 252;22  
 MS: 195;8, 197;5, 197;8, 197;18, 197;21, 197;25, 198;20, 269;15,  
 269;21, 270;12, 270;19, 271;12, 271;14, 271;15, 271;17, 278;9,  
 295;6, 295;17, 295;19, 297;13, 297;25, 298;3, 299;18, 302;23  
 MT-1: 196;3, 226;3  
 MT-2: 196;3, 226;4, 226;8, 296;25  
 MT-3: 223;20, 225;15  
 myself: 289;11

<N>

NAME: 195;3, 200;20, 297;22, 305;13, 305;20, 308;5, 308;7, 308;8,  
 308;10, 308;12  
 NANCY: 194;20  
 Nanette: 196;4, 269;6, 270;12, 317;9  
 nature: 245;2  
 necessarily: 249;6, 309;19  
 need: 197;7, 223;9, 223;24, 246;7, 246;8, 252;15, 256;12, 263;7,  
 264;18, 264;20, 265;1, 274;25, 276;5, 289;17, 291;22, 293;21,  
 294;19, 298;5, 307;25, 308;1  
 needs: 248;8, 286;13, 286;23, 288;10, 288;17, 297;19  
 NEGATIVE: 320;8  
 negatives: 288;4  
 negotiate: 278;3, 294;25  
 negotiating: 278;7  
 negotiation: 268;20, 275;3  
 negotiations: 194;6, 286;12, 269;22, 269;24, 271;23, 273;2, 274;13,  
 274;18, 274;21, 275;4, 275;16, 278;24  
 network: 244;9, 244;10, 300;7  
 New: 201;24, 245;10, 246;13, 292;12, 293;15  
 next: 199;25, 245;15, 248;5, 247;7, 246;4, 248;16, 249;10, 249;25,  
 253;14, 263;5, 263;20, 263;21, 284;15, 320;24  
 nine: 199;18, 199;20  
 nodding: 199;24  
 nondiscriminatory: 245;19, 247;23, 262;25, 286;5, 296;9, 296;15,

297:15, 297:20, 298:5, 298:10  
None: 248:11, 248:12  
normal: 320:17  
note: 226:7  
noted: 194:23  
nothing: 254:4  
notification: 244:16, 244:17, 245:12, 250:18, 305:2, 312:16  
November: 262:17, 262:18, 300:23, 300:24  
nowadays: 267:10  
NUMBER: 196:2, 201:17, 256:3, 286:19, 290:25, 295:10, 295:13, 295:20,  
299:10, 299:12, 299:13, 309:22  
numbers: 199:3

<O>  
OBF: 258:3  
Object: 248:14, 247:14, 271:4, 275:17, 285:15, 305:21, 311:17,  
311:21, 312:1, 313:3, 315:18, 317:15, 319:13  
objected: 268:6  
Objection: 198:2, 198:6, 226:11, 267:23, 268:7, 271:9, 272:3, 272:7,  
272:13, 275:9, 279:11, 284:19, 290:13, 290:23, 293:17, 293:20,  
315:5, 316:24, 317:6, 317:7, 317:8, 317:11, 317:12, 317:17, 318:14  
objects: 316:21  
obtain: 304:18, 313:5  
occur: 199:11  
October 27, 1999: 194:15  
October 4th: 277:17  
offer: 272:19, 273:13, 276:18  
offered: 265:24, 266:1, 266:15, 267:20, 267:21, 273:3, 275:22,  
293:12, 318:11, 318:16  
offering: 276:3  
office: 261:16  
officer: 198:4  
Okay: 197:8, 197:16, 197:20, 198:4, 198:18, 198:24, 199:8, 200:3,  
225:16, 226:17, 246:7, 248:6, 248:21, 252:2, 252:6, 253:3, 253:17,  
254:14, 255:1, 257:1, 260:5, 260:25, 261:14, 263:18, 285:13,  
265:20, 267:19, 268:12, 270:4, 270:9, 270:20, 270:23, 272:21,  
273:1, 273:23, 274:5, 274:20, 278:9, 278:19, 279:4, 279:14,  
279:19, 279:24, 283:15, 284:25, 286:21, 288:2, 288:7, 288:13,  
288:19, 288:25, 291:14, 294:7, 294:9, 295:20, 295:21, 296:21,  
301:25, 304:13, 305:16, 308:10, 308:11, 310:5, 311:4, 314:11,

316:18, 317:13, 317:16, 318:22, 321:7, 321:16  
omission: 321:20  
once: 273:16, 273:20, 279:3  
One: 198:3, 201:4, 223:18, 248:1, 248:3, 246:16, 246:23, 258:6,  
259:10, 260:7, 268:8, 269:10, 271:7, 281:24, 281:25, 292:8,  
297:23, 303:24, 306:3, 306:15, 312:13, 312:13, 312:15, 319:7,  
320:2, 321:5  
opened: 254:1, 297:6  
operation: 225:10  
opinion: 298:14, 301:1, 301:5, 315:2, 315:8, 315:16, 319:22, 320:14  
opinions: 315:23  
opposed: 274:6, 274:10  
option: 254:17  
orally: 203:17  
order: 244:18, 245:9, 247:11, 249:16, 252:2, 255:4, 258:20, 263:8,  
263:11, 263:15, 263:23, 264:11, 284:19, 264:21, 265:3, 279:21,  
281:1, 281:9, 281:9, 281:15, 281:16, 281:19, 281:20, 281:21,  
282:2, 282:10, 282:12, 282:18, 283:20, 283:24, 284:9, 284:13,  
285:11, 286:10, 286:24, 290:20, 295:12, 295:16, 297:19, 298:5,  
299:12, 299:24, 300:4, 313:22, 313:24, 316:23  
ordered: 201:25, 278:14  
Ordering: 245:19, 245:20, 246:2, 246:6, 247:21, 248:3, 258:3, 259:17,  
259:18, 262:16, 262:23, 265:3, 284:4, 298:16, 299:8, 299:20,  
299:23, 300:10, 300:22, 301:3, 301:6, 301:11  
orders: 244:20, 245:7, 249:1, 259:22, 297:1, 299:11, 299:13  
Originally: 265:11  
originating: 303:20, 303:21  
OS: 304:5, 304:7  
OSS: 245:17, 256:15, 256:15, 258:14, 260:10, 296:9, 296:15, 297:18,  
298:4, 298:9, 299:1, 299:19, 300:9, 304:1  
OSSs: 256:11  
Others: 197:21  
outside: 283:25  
outstanding: 266:8  
overall: 290:12, 291:10, 291:11  
overlapping: 259:13  
own: 261:15, 285:10, 289:14, 315:22

<P>  
PAGE: 195:3, 201:15, 201:23, 202:4, 202:4, 202:8, 202:8, 202:10,

202:10, 202:14, 202:20, 202:22, 202:25, 203:1, 203:2, 203:3,  
203:3, 224:10, 224:11, 224:12, 224:12, 224:14, 224:14, 224:17,  
255:12, 275:8, 279:19, 279:20, 283:6, 283:7, 283:9, 283:13,  
286:19, 286:21, 296:6, 312:13, 320:3  
Pages: 194:10, 201:2, 223:4, 223:15, 279:16, 286:15, 286:20, 311:14,  
312:12, 312:15, 320:2  
paid: 273:16, 278:8  
paper: 294:14  
paragraph: 266:16, 270:25, 284:15  
parity: 281:12, 281:12  
Parkey: 196:4, 269:5, 270:13  
Parse: 201:18, 247:8, 296:19, 298:19, 296:22, 298:18, 303:10, 303:19,  
304:2, 305:15, 307:22, 307:23, 308:1, 308:2, 310:20, 316:3, 320:15  
parsing: 202:1, 246:23, 247:17, 305:16, 306:9, 306:12, 307:15,  
307:16, 308:18, 308:23, 309:10, 315:17  
part: 248:1, 254:15, 254:16, 261:6, 262:1, 266:25, 267:2, 267:3,  
280:7, 280:8, 280:8, 284:10, 284:11, 287:22, 299:2, 301:4, 304:1,  
304:2, 304:6, 304:15, 315:1, 316:8, 318:15  
participant: 260:17, 274:12, 274:18  
participate: 274:7, 277:23, 279:9  
participated: 271:24  
particular: 202:5, 313:1, 314:9  
particularly: 199:9  
parties: 201:10, 224:21, 255:4, 259:4, 259:8, 266:13, 270:25, 271:20,  
271:25, 276:8  
parties: 271:23  
parts: 250:9, 250:9, 250:12, 287:11, 289:17, 289:18, 293:3  
passages: 271:11  
paste: 307:19, 307:20  
Pat: 305:2  
Pate: 247:22, 284:20, 285:16, 285:20, 285:22  
Pate's: 280:5, 282:20, 283:11, 283:12, 284:17, 284:22, 285:9, 285:9  
path: 294:20  
pay: 287:13, 290:18, 291:16  
people: 289:19, 320:16  
percent: 297:2  
percentage: 290:7, 290:12, 290:17, 291:2, 291:3, 291:10, 297:3  
percentages: 297:2  
perfect: 280:10  
perform: 251:15, 251:21, 299:8, 300:9, 301:9

performing: 302:1  
performs: 289:8  
Perhaps: 276:17, 291:2  
period: 291:23  
periodically: 259:19  
person: 277:25  
personal: 275:19, 308:19, 310:8, 311:22, 313:7, 317:18, 317:25  
personally: 313:5, 314:17  
perspective: 267:13  
Petition: 194:4, 255:18, 255:21  
phase: 304:6, 304:7  
phone: 294:1  
pick: 245:1  
picking: 203:2, 308:15  
picks: 259:22, 300:8  
picture: 263:14  
pie: 280:11  
piece: 249:21, 249:21, 257:9, 262:15, 262:16, 262:22, 280:11, 282:6,  
283:25, 286:13  
pieces: 305:20  
PLACE: 194:17  
placed: 291:11  
places: 252:2  
plan: 304:8, 308:23, 309:12  
Please: 200:20, 244:5, 272:25, 296:17, 306:25, 311:16, 312:24, 314:7,  
314:8, 315:12  
point: 252:18, 252:19, 261:3, 320:9, 320:18  
populate: 266:24  
portion: 261:5, 266:5  
portions: 201:9, 224:18, 321:13  
position: 255:4, 288:4, 289:7, 320:7  
possibly: 199:22, 310:23  
poster: 245:15  
precise: 290:24  
preferably: 289:4  
preferred: 245:18, 257:3  
Prefilled: 195:6, 195:7, 201:1, 201:2, 203:8, 203:12, 203:16, 223:3,  
223:4, 223:15, 223:16, 223:19, 223:24, 224:23, 225:2, 225:6,  
244:3, 244:3, 248:1, 248:19, 253:24, 254:2, 317:2  
prehearing: 198:4, 255:4, 295:12



prejudice: 320;3  
 premise: 290;25, 291;2  
 preorder: 281;10, 304;2  
 preordering: 246;8, 247;9, 247;12, 247;21, 248;3, 249;21, 249;21, 252;5, 257;9, 262;15, 262;22, 279;25, 280;2, 280;3, 280;7, 261;13, 282;6, 282;10, 283;25, 266;8, 286;11, 286;12, 297;16, 297;20, 298;6, 298;11, 298;16, 299;6, 300;10, 300;18, 300;21, 301;2, 301;6, 301;9, 301;10, 301;14, 301;15  
 prepared: 244;2  
 present: 272;7, 275;16, 295;16, 321;14  
 presentation: 307;21  
 presented: 272;17, 292;10  
 pretty: 199;6  
 prevent: 265;18  
 previous: 201;11, 314;21  
 previously: 200;6  
 price: 267;1, 267;3, 268;14, 268;16, 269;22, 270;16, 275;3, 275;6, 275;8, 275;10, 275;22, 275;24, 276;25, 276;25, 277;1, 277;2, 278;25, 296;1  
 pricing: 275;17  
 prior: 292;20  
 priority: 303;22  
 Probably: 198;15, 198;15, 198;21, 199;13, 254;21, 255;11, 255;20, 290;11, 306;24, 308;7  
 problem: 264;2, 264;4  
 problems: 261;23  
 proceed: 270;2  
 proceeding: 247;15, 247;21, 251;9, 271;20, 272;14, 278;14, 312;6  
 PROCEEDINGS: 194;12  
 Process: 252;13, 254;10, 256;8, 258;8, 258;22, 259;19, 259;23, 260;4, 260;12, 260;15, 265;16, 313;1, 314;14  
 processing: 259;23, 300;4  
 produced: 313;2, 314;10  
 producing: 266;9  
 product: 254;19, 307;5  
 production: 201;24  
 programming: 301;19  
 project: 304;8  
 proposal: 270;15, 282;17  
 propose: 199;14, 281;14

quote: 280;23, 280;24, 284;1  
 quotes: 304;7  
 <R>  
 raised: 262;4  
 Rand: 305;2  
 rarely: 272;14  
 rate: 246;3, 276;13  
 rather: 320;25, 321;3  
 Re: 194;4  
 reach: 199;4  
 reaching: 224;21  
 read: 201;24, 202;7, 202;22, 203;16, 203;19, 203;21, 225;7, 225;17, 269;11, 269;13, 271;5, 271;11, 272;6, 272;6, 275;11, 282;21, 284;21, 284;24, 285;8, 285;22, 294;11, 294;20, 295;20, 303;15, 311;19, 313;14, 320;1  
 reading: 317;21  
 ready: 246;5, 283;12  
 real: 259;24  
 realize: 267;7  
 Really: 252;7, 266;4, 308;24, 311;12, 317;25, 319;24  
 reason: 252;14, 280;1, 293;5  
 reasons: 311;25  
 Rebuttal: 195;7, 223;4, 223;16, 223;19, 223;24, 224;23, 225;2, 225;6, 225;11, 225;14, 225;17, 225;20, 244;3, 255;13, 279;16, 279;20, 286;16, 286;20  
 receive: 291;25, 292;4, 297;19, 298;5, 298;10  
 received: 272;19, 277;12  
 receives: 288;5  
 receiving: 296;14, 297;15  
 RECESS: 294;6, 321;18  
 recipient: 271;6  
 recitation: 274;2  
 recognize: 257;13  
 recollection: 320;18  
 RECORD: 197;4, 197;16, 198;2, 198;6, 200;21, 202;9, 203;17, 203;20, 203;21, 223;11, 224;20, 225;7, 225;17, 226;7, 226;13, 247;10, 247;17, 248;11, 248;13, 264;19, 272;10, 294;8, 295;22, 305;18, 307;2, 308;21, 309;6, 311;15, 311;19, 313;20, 314;3, 316;11, 316;24, 318;25, 318;25, 320;10, 320;19

proposed: 280;25, 281;18, 315;3  
 propounded: 319;21  
 proprietary: 291;6, 291;7  
 prorata: 277;23, 278;21  
 prorate: 279;5  
 prorated: 249;8, 274;1  
 proud: 246;4  
 provide: 244;5, 249;2, 250;1, 261;10, 265;25, 266;1, 266;15, 266;17, 267;16, 267;20, 267;21, 269;18, 269;18, 271;2, 273;4, 277;24, 278;15, 282;23, 289;3, 291;3, 282;14, 292;21, 293;5, 293;12, 293;16, 295;23, 301;10, 302;7, 310;20  
 provided: 250;14, 256;15, 256;16, 269;15, 290;19, 290;21, 291;17, 311;24  
 provides: 251;19, 254;19, 296;10, 301;12, 308;20, 309;5, 309;8  
 providing: 250;5, 256;12, 273;25  
 proving: 225;9  
 provisioning: 265;18, 290;1  
 PUBLIC: 194;2  
 pull: 247;10, 251;17, 308;11, 308;12, 309;19  
 pulls: 263;17  
 purpose: 225;9, 311;20, 313;8  
 put: 247;11, 263;8, 264;19, 265;3, 294;11, 302;13, 313;19  
 puts: 245;10  
 putting: 245;10  
 <Q>  
 quality: 244;13, 244;14  
 quarter: 304;12  
 QUESTION: 201;2, 202;5, 223;4, 223;16, 226;12, 248;1, 253;25, 254;7, 254;13, 254;23, 256;13, 257;10, 259;9, 259;11, 262;21, 263;7, 264;3, 265;23, 268;2, 268;6, 268;18, 271;9, 272;17, 274;16, 275;9, 275;18, 285;1, 285;3, 285;5, 285;8, 285;15, 285;16, 289;22, 290;25, 293;25, 294;8, 294;11, 294;16, 294;23, 298;1, 300;19, 302;5, 305;3, 306;13, 309;4, 309;13, 314;6, 314;21, 314;22, 315;11, 316;9, 316;11, 319;20  
 questioning: 272;22  
 questions: 199;10, 199;12, 203;11, 225;1, 255;9, 260;7, 271;23, 275;12, 295;3, 297;8, 298;2, 302;22, 312;21, 313;10, 313;14, 314;2, 314;24, 316;12, 316;15, 316;18, 316;17, 319;18  
 quite: 276;1

Records: 201;18, 223;22, 267;11, 276;7, 313;11  
 recoup: 249;5, 250;20, 266;9  
 recross: 310;13  
 REDIRECT EXAMINATION: 195;9, 311;10  
 Redirect: 297;12, 311;8, 313;23, 316;1, 316;17  
 reference: 298;7, 305;24  
 referred: 258;11, 314;24  
 referring: 245;17, 258;3, 260;13, 298;25, 299;1, 312;20, 312;21  
 reflect: 270;25, 275;6  
 reflects: 273;1, 275;24, 284;17  
 refuse: 287;12  
 refused: 292;21, 295;2  
 regard: 275;16, 288;7, 315;2, 315;8, 315;16, 320;14  
 regarding: 247;16, 266;19, 268;13, 268;20, 274;18, 279;21, 305;5, 306;5  
 Regional: 248;22, 251;11, 295;24  
 regulatory: 269;21, 270;1, 272;13, 292;18, 293;14  
 rejected: 263;23  
 rekey: 262;8  
 rekeying: 261;23, 262;4  
 relates: 315;17, 319;1  
 relatively: 303;8  
 release: 247;8  
 relled: 313;10  
 rely: 320;17  
 remaining: 203;12, 203;16, 224;23  
 remains: 203;8, 309;12  
 remember: 277;3, 277;4, 277;15, 277;19, 297;1, 299;17, 308;5  
 remind: 197;6  
 renumbered: 255;18  
 repair: 249;25, 250;4, 250;22, 266;22, 267;1, 288;15, 289;9, 289;16, 290;8, 292;6, 293;3  
 repaired: 289;17  
 repairs: 289;14, 289;23, 289;23, 291;10, 291;15  
 repeat: 281;25, 272;24, 274;16, 285;14, 288;12, 314;6  
 report: 289;6  
 REPORTED: 194;20  
 REPORTER: 197;15, 294;10, 294;13, 294;22  
 reports: 281;16, 287;2, 304;22  
 represent: 314;18

representation: 316;4  
 representative: 249;15, 263;15, 280;6, 283;21  
 representatives: 314;18  
 representing: 318;3  
 Request: 196;8, 246;14, 247;5, 249;9, 287;20, 274;1, 283;5, 283;19,  
 284;8, 284;12, 292;11, 292;12, 293;15, 303;14, 303;17, 304;15,  
 304;16, 305;5, 307;13, 312;9, 312;14, 314;11, 314;12, 314;20  
 requested: 246;22, 304;1  
 requesting: 202;18, 202;23, 244;17, 250;1, 261;12, 287;11, 291;16,  
 304;11  
 requests: 258;11, 307;8  
 required: 245;1, 295;23, 298;9, 319;25  
 requires: 259;11  
 REREAD: 285;2, 294;22  
 rereading: 311;20  
 resale: 287;5, 299;11  
 research: 247;2, 253;21, 281;9  
 researching: 253;22, 282;11  
 resolve: 250;8, 250;12, 310;25  
 resolved: 224;9, 225;13, 245;16, 245;16, 310;17  
 respect: 282;9, 287;1  
 respond: 254;1, 258;24, 308;1, 318;22, 319;20  
 responded: 268;7, 307;10, 307;11  
 response: 288;2, 304;23, 305;3, 305;7, 312;21, 314;24  
 responses: 198;13  
 responsible: 244;9, 278;6, 278;7  
 responsive: 254;12  
 restate: 306;25  
 restaurant: 287;17  
 result: 224;3, 224;4, 224;20, 224;21, 288;16  
 return: 301;20  
 returns: 301;23  
 reviewing: 266;22, 266;23  
 RF-1870: 312;12  
 ridiculous: 291;22  
 risk: 314;22  
 robust: 253;7  
 Room: 194;18  
 rooted: 248;9, 253;24  
 rough: 199;2

SERVICE: 194;2, 201;18, 244;14, 244;14, 245;11, 249;17, 260;2,  
 263;15, 280;6, 283;4, 283;18, 290;1, 292;13, 300;4, 300;8, 305;18,  
 308;21, 309;8  
 services: 244;8, 245;23  
 set: 245;20, 257;24  
 settled: 259;3  
 settlement: 224;21  
 shaking: 307;2  
 share: 250;20, 278;20  
 sharing: 277;23  
 She's: 271;16, 271;17  
 sheets: 197;10, 197;13, 198;4  
 shocked: 247;1  
 short: 293;22, 298;7  
 shouldn't: 255;20, 292;16  
 show: 288;22, 269;1  
 showed: 269;10, 277;8  
 sic: 304;5, 304;7, 304;19  
 Side: 245;4, 253;8, 256;20, 259;24, 306;3, 306;15, 306;16  
 significant: 290;22  
 simple: 246;10, 299;9  
 simply: 197;23, 265;6, 305;17  
 sir: 283;14, 287;23  
 sit: 286;3  
 site: 245;13, 292;9, 293;1  
 sits: 300;5  
 Six: 299;15, 299;16  
 Sixteen: 317;1  
 Skipping: 201;20  
 slash: 308;7, 308;9  
 slower: 298;1  
 small: 253;7, 253;10, 256;2  
 smart: 298;7  
 Software: 245;24, 257;17, 261;19, 303;23, 303;24  
 solution: 254;20, 299;21  
 somebody: 255;3, 319;15, 319;16  
 somehow: 293;1  
 someone: 304;22, 311;23, 313;5, 314;14, 318;3  
 soon: 245;13  
 sorry: 202;17, 223;12, 224;4, 248;7, 258;6, 260;14, 262;19, 264;23,

Rozycki: 269;21, 306;19  
 RPR: 194;20  
 RSAG: 201;25, 202;7, 202;23, 202;24, 248;18, 248;22, 248;22, 249;3,  
 250;18, 251;8, 251;11, 251;16, 251;21, 252;3, 252;19, 261;1,  
 261;5, 261;11, 261;12, 261;22, 262;2, 265;25, 266;2, 266;19,  
 267;21, 268;21, 271;2, 273;5, 273;13, 273;25, 274;2, 274;19,  
 275;1, 275;17, 276;11, 276;15, 278;21, 295;24  
 rule: 244;17, 250;18, 276;9, 313;12  
 rules: 244;25, 245;3, 306;24, 309;1, 309;3, 309;16, 309;18, 309;23,  
 310;20, 311;2, 311;2  
 rulings: 201;11, 224;5, 224;20, 305;22  
 rulings: 225;23  
 run: 314;16  
 running: 246;1  
  
 <S>  
 salary: 287;22  
 saw: 268;15  
 saying: 258;24, 265;1, 266;16, 279;1, 284;20, 319;15  
 says: 246;7, 281;8, 273;6, 276;19, 276;19, 280;5, 285;22, 286;23,  
 287;16, 292;9, 296;20, 301;8, 303;25, 305;2, 309;2, 316;3  
 scheduled: 278;13  
 schema: 266;21  
 scratch: 254;18, 299;23  
 screen: 263;14, 263;21, 308;13  
 second: 264;14, 304;6, 304;6  
 seem: 306;25  
 seen: 261;8, 266;11, 266;14, 268;12, 268;18, 268;19, 269;9, 270;1,  
 271;7, 271;21, 260;23, 305;3, 305;6, 305;7, 306;3, 307;12, 309;12  
 send: 244;20, 245;6, 253;9, 264;11, 264;13, 264;15, 264;20, 265;4,  
 287;12, 287;14, 297;1  
 sending: 292;25  
 sends: 284;7, 284;12, 300;7  
 sent: 259;22, 276;4, 276;17, 305;4  
 sentence: 201;20, 201;23, 201;24, 202;7, 202;15  
 September 23, 1999: 269;6  
 September 23rd: 268;20  
 September 23rd, 1999: 270;12, 270;24  
 September 23rd.: 277;14  
 September: 223;3, 223;15, 275;7

270;10, 275;14, 283;8, 286;18, 287;23, 294;15, 301;4, 302;15,  
 306;21, 321;2  
 sort: 276;16  
 sorts: 320;4  
 sound: 298;7  
 sounds: 246;10  
 sparse: 247;3  
 speaking: 303;9  
 specific: 280;19, 281;5, 297;18, 298;4, 302;9  
 specifically: 296;2  
 specifications: 202;1, 257;25, 269;20  
 spend: 201;8, 321;12  
 spot: 294;11  
 square: 246;16  
 Staff: 196;18, 295;4, 297;10, 320;6  
 stages: 302;3  
 stand: 197;6, 200;5, 203;13, 203;17, 269;12, 271;16  
 standard: 259;7, 303;24  
 standards: 256;9, 256;11, 256;14, 257;16, 257;24, 303;25  
 stands: 251;11  
 start: 199;16, 199;18, 199;21, 245;14, 277;17, 313;17  
 started: 253;20, 254;16, 254;21, 321;6  
 starting: 199;16, 283;9  
 starts: 249;16, 259;23, 280;5  
 state: 200;20, 299;5, 319;5  
 stated: 244;7, 245;18, 257;7, 275;15, 276;4, 303;6, 303;10, 304;4,  
 307;15, 318;16  
 statement: 257;1, 288;9  
 statements: 272;8  
 static: 257;5  
 status: 250;3, 281;16, 281;21, 282;11, 286;10, 286;12, 286;12  
 stay: 259;18  
 step: 246;5, 253;14, 263;5  
 stop: 294;3, 321;5  
 store: 267;11, 291;21  
 story: 306;4  
 straight: 262;11, 306;21  
 stream: 308;20, 309;5  
 Street: 248;22, 251;11, 295;24  
 stricken: 199;6, 201;19, 203;6, 223;25, 253;21, 253;24, 321;14

strike: 202:14, 248:12  
 string: 308:3  
 struck: 202:9, 247:17, 248:11  
 Subject: 198:2, 198:6, 251:10, 277:19, 283:3, 290:17, 290:24, 291:1, 291:4, 296:6, 297:6  
 subject-matter: 266:19  
 submission: 319:9  
 submit: 289:10, 314:12  
 submitted: 249:20, 292:17, 303:14, 303:17, 303:18, 307:13, 310:2, 319:8  
 Subsequent: 249:3, 273:13, 304:10  
 substantial: 249:22, 290:20  
 suggestions: 260:22, 260:24  
 summary: 244:2, 248:9, 248:17, 250:17, 250:24, 252:20, 252:24, 273:23, 287:9, 288:24  
 suppose: 275:12  
 supposed: 287:15, 301:24, 302:2, 308:25  
 surprised: 276:1  
 survive: 225:22  
 SUSAN: 194:13  
 Sustained: 272:15, 279:12  
 swear: 197:7  
 switch: 263:3  
 sworn: 200:6, 200:16, 226:15  
 system: 244:10, 250:5, 250:6, 261:16, 261:20, 283:20, 296:23, 298:22, 298:25, 299:1, 299:19, 299:23, 299:25, 300:4, 300:5, 300:9, 300:11, 300:12, 300:13, 301:15, 301:18, 301:23, 317:23  
 systems: 245:5, 245:6, 256:15, 256:16, 259:1, 260:10, 261:18, 266:24, 298:10, 302:9  
 <T>  
 T-A-G: 252:8  
 table: 267:17  
 TAFI: 250:5, 250:15, 287:3, 287:4, 287:7, 288:5, 288:6, 288:20, 288:22, 288:25, 289:2, 289:3, 289:6, 290:2, 290:4, 292:14  
 TAG: 248:7, 248:8, 248:10, 248:20, 247:1, 247:2, 247:2, 247:6, 247:23, 248:2, 252:8, 252:10, 252:14, 252:15, 252:22, 253:4, 253:12, 253:15, 254:7, 254:9, 259:11, 259:16, 261:3, 261:7, 261:10, 262:3, 262:6, 262:7, 262:9, 262:14, 267:16, 296:21, 296:22, 298:17, 298:17, 298:18, 298:19, 300:15, 300:18, 300:20,

301:1, 301:5, 301:9, 301:12, 301:15, 301:25, 303:7, 303:10, 303:23, 305:9, 305:14, 308:19, 308:22, 309:5, 309:7, 310:11, 315:3, 315:3, 315:8, 315:17, 315:20, 315:24, 316:3, 319:19, 320:15  
 tags: 308:9  
 Tallahassee: 194:19  
 team: 268:20  
 tear: 311:2  
 technical: 269:18, 269:19, 269:20, 269:25, 300:3  
 technician: 250:9, 287:10  
 technicians: 250:11  
 Telecommunications: 194:7, 248:8, 252:8  
 template: 244:21, 244:24  
 ten: 309:21  
 tender: 251:1  
 TENDERED: 268:25, 295:18, 315:19  
 terminology: 264:25  
 terms: 258:25  
 testified: 200:16, 261:14, 279:4, 298:5, 298:8, 297:9, 297:14, 298:20, 300:17, 313:4, 315:22  
 testimonies: 247:4  
 Testimony: 195:6, 195:7, 199:5, 201:2, 201:5, 201:10, 201:16, 203:9, 203:12, 203:16, 223:5, 223:16, 223:19, 223:23, 223:24, 224:19, 224:24, 225:2, 225:6, 225:17, 225:22, 226:4, 226:14, 226:15, 244:3, 247:15, 247:22, 248:1, 248:4, 248:9, 248:19, 253:25, 254:2, 255:13, 262:4, 276:24, 280:5, 282:20, 283:12, 284:17, 284:22, 285:9, 285:10, 286:16, 321:13  
 text: 307:22, 307:23, 309:8  
 Thanks: 255:23  
 themselves: 281:5, 296:12  
 theoretically: 265:5  
 There's: 300:4, 308:12, 309:1, 317:12, 319:23, 320:12  
 they've: 293:2, 293:11, 307:11, 309:1  
 third: 264:16, 267:24  
 THOMAS: 195:5, 198:15, 198:22, 199:25, 200:4, 200:6, 200:8, 200:14, 200:22, 200:25, 203:6, 223:2, 223:2, 223:14, 224:15, 224:18, 244:2, 244:8, 251:1, 251:6, 254:14, 256:1, 258:2, 258:7, 258:10, 258:13, 258:18, 259:2, 259:7, 259:15, 260:1, 260:25, 283:12, 263:19, 264:8, 264:23, 265:9, 265:12, 265:17, 266:11, 266:5, 268:10, 269:4, 270:10, 270:14, 270:18, 270:23, 272:24, 273:8, 273:12, 274:13, 274:21, 276:23, 277:6, 277:20, 279:4, 279:15,

281:8, 282:25, 283:2, 283:8, 284:17, 285:22, 286:15, 286:2, 291:24, 293:14, 294:12, 294:24, 295:7, 297:14, 299:16, 303:8, 306:15, 306:21, 308:2, 308:8, 309:4, 309:15, 310:4, 310:9, 310:19, 310:24, 311:1, 311:5, 311:12, 311:22, 312:19, 320:21, 320:23, 321:15  
 Thomas's: 201:9, 203:16, 226:4  
 though: 203:20, 203:21, 225:17, 306:22, 315:19, 318:11  
 thousand: 277:2, 277:3  
 three: 248:3, 264:10, 289:19, 311:14  
 three-page: 316:20  
 ticket: 288:16  
 tickets: 250:2, 289:11, 290:7, 290:12, 291:11  
 ticking: 254:21  
 tied: 299:23  
 time-consuming: 280:8  
 timing: 260:22  
 Title: 303:19  
 Today: 197:19, 197:21, 199:4, 199:15, 203:12, 203:18, 225:2, 244:13, 244:16, 244:20, 250:5, 252:2, 252:5, 271:13, 271:14, 271:15, 278:20, 292:23, 296:18, 298:12, 298:17  
 tomorrow: 199:17, 199:21, 199:23  
 took: 245:24, 257:7, 265:15  
 top: 305:23  
 topic: 244:16  
 total: 293:2  
 track: 250:3, 250:11  
 training: 245:23, 246:19  
 transcript: 321:19  
 transferable: 246:12, 246:13  
 tried: 294:25, 313:17  
 triple: 319:14  
 trouble: 250:2, 250:8, 276:16, 287:2, 287:25, 288:16, 289:6, 289:11, 290:7, 290:12, 291:11, 293:3  
 troubles: 250:3, 250:13, 287:5  
 truck: 289:18  
 true: 286:2, 305:14, 305:14  
 truth: 272:8, 272:17, 276:3, 318:11, 318:16  
 try: 265:22, 277:20, 294:15, 311:1, 313:23  
 trying: 253:17, 263:3, 264:3, 264:4, 264:24, 271:10, 275:25, 291:7, 298:1, 300:16, 313:22

turn: 201:15, 279:17, 286:15, 295:9  
 Two: 197:5, 201:4, 225:21, 245:17, 257:2, 271:20, 271:25, 276:8, 282:9, 289:19, 289:19, 312:12, 312:15, 316:7, 317:1, 317:5  
 Type: 263:16, 274:24, 303:23  
 <U>  
 understand: 197:9, 224:19, 225:18, 250:14, 256:2, 264:25, 266:8, 266:25, 277:22, 285:12, 289:1, 296:24, 298:1, 301:16, 301:22, 301:24, 302:2, 302:4, 312:7  
 understanding: 249:13, 251:13, 251:14, 251:16, 257:22, 259:11, 262:9, 263:7, 266:7, 268:18, 276:16, 280:3, 292:2, 301:9, 303:12, 303:13, 308:12, 309:9, 312:25, 319:19  
 undertaken: 256:3  
 undertaking: 253:10  
 underway: 253:16  
 Unfortunately: 314:15  
 unresolved: 194:5  
 until: 249:16, 252:10  
 update: 266:2  
 updates: 249:3, 267:22, 271:3, 273:5, 273:14, 278:21  
 upgrade: 304:1  
 urgent: 303:22  
 useful: 311:20  
 user: 287:15  
 users: 290:2  
 uses: 280:2, 280:3, 287:11, 290:2, 299:5  
 using: 252:10, 261:24, 298:17, 308:22, 309:7  
 <V>  
 vague: 291:1, 320:16  
 valid: 301:21, 307:7  
 validate: 248:25, 251:18, 252:12, 252:16, 261:12, 261:15, 262:7, 287:15, 289:5, 298:21, 301:17  
 validated: 265:9, 265:15  
 validates: 252:3  
 validation: 251:15, 251:22, 299:2  
 validations: 261:16  
 valuable: 305:20  
 value-added: 300:7  
 VAN: 300:7

variable: 309;22  
various: 225;23  
vendor: 305;12, 309;17, 310;3  
vendor's: 305;13, 316;4  
verified: 305;14  
verify: 263;9, 300;20, 318;7  
VI: 198;1  
via: 244;20, 245;12, 245;13, 246;3, 250;5, 250;15, 250;15, 253;9,  
261;7, 262;7, 266;25, 296;23, 299;24  
visit: 292;9, 293;1  
volition: 315;22  
VOLUME: 194;9, 196;1, 321;20  
volunteered: 311;16, 313;14

<W>

waiter: 287;17  
wanted: 197;17, 270;2  
wanting: 252;9, 261;4  
wants: 249;11, 261;2, 266;6, 289;14  
Web: 245;13, 307;20  
Wednesday: 194;15  
week: 247;1, 248;4, 248;7  
weighing: 254;17  
weight: 319;3, 320;12  
welcome: 255;24  
whatever: 246;18, 263;21, 269;14, 269;20, 317;24  
WHEREUPON: 200;13, 294;22, 321;19  
whether: 248;2, 254;17, 254;18, 254;18, 275;23, 279;1, 285;16,  
285;17, 285;19, 286;1, 286;6, 286;14, 291;12, 293;7, 305;10,  
307;8, 307;9, 308;19, 309;5, 318;6, 319;7, 319;9  
whole: 246;13, 267;8, 267;7, 287;25  
wholesale: 259;12  
whom: 200;23  
wide: 244;10  
Will: 197;7, 197;16, 197;18, 197;19, 197;21, 197;23, 197;24, 197;25,  
198;3, 199;3, 199;5, 199;8, 199;22, 203;19, 203;20, 225;16,  
225;22, 226;5, 244;22, 247;23, 248;12, 252;16, 253;8, 255;3,  
256;19, 257;13, 258;23, 261;10, 261;23, 262;3, 265;8, 269;19,  
270;11, 270;14, 271;12, 277;24, 289;7, 289;24, 293;22, 297;10,  
297;11, 309;24, 312;6, 314;2, 320;25, 321;3

Williamson: 303;18, 312;14  
willing: 250;15, 276;20, 290;16, 290;20, 291;16, 298;14, 302;19  
window: 254;24, 304;9, 304;10  
withdraw: 293;20, 316;9, 316;10  
within: 297;3, 301;15  
without: 264;5, 296;16, 321;20  
WITNESS: 198;10, 199;10, 199;11, 199;25, 200;8, 200;15, 224;15,  
248;14, 254;14, 256;2, 256;7, 256;10, 256;13, 256;16, 259;2,  
259;7, 259;15, 260;1, 263;12, 263;19, 264;6, 264;23, 265;9,  
265;12, 265;17, 266;10, 269;1, 270;10, 270;14, 271;21, 273;10,  
273;12, 274;21, 275;15, 276;20, 279;6, 279;18, 283;2, 283;6,  
285;22, 294;24, 295;16, 299;18, 306;15, 308;2, 309;15, 310;4,  
310;19, 310;24, 311;1, 311;5, 311;16, 313;4, 315;12, 315;19,  
315;23, 316;15, 317;16, 318;20, 319;14, 320;13, 320;24, 321;9  
WITNESSES: 195;2, 199;1  
Wood: 197;6, 198;16, 198;23, 276;12  
Word: 201;21, 202;2, 202;3, 202;6, 306;13, 308;14  
words: 201;25, 202;5, 202;21, 256;2, 264;22, 264;23  
work: 256;19, 269;20, 301;24, 304;6, 309;24  
working: 245;14, 257;23, 263;13  
works: 199;12, 257;17, 292;16, 311;23, 314;15, 316;4  
wrap: 277;21  
write: 261;19, 302;11  
written: 251;17, 280;23  
wrote: 294;13

<Y>

Y2K: 304;9, 304;10  
year: 257;20, 282;22, 282;23, 304;14, 305;5  
years: 245;16, 257;2  
yourself: 310;1