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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF DAVID P. SCOLLARD
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 960786-TL
AUGUST 20, 2001

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
BELLSOUTH TELECOMMUNICATIONS, INC.

A. I am David P. Scollard, Room 28A1, 600 N. 19th St., Birmingham, AL 35203.
My current position is Manager, Wholesale Billing at BellSouth Billing, Inc.
("BBI"), a wholly owned subsidiary of BellSouth Telecommunications, Inc.
("BellSouth"). In that role, I am responsible for overseeing the implementation
of various changes to BellSouth's Customer Records Information System
("CRIS"), Carrier Access Billing System ("CABS"), and BellSouth Industrial
Billing System ("BIBS").

Q. ARE YOU THE SAME DAVID SCOLLARD THAT FILED DIRECT
TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS
PROCEEDING?

1 A. The purpose of my testimony is to reply to the testimony of Alternative Local
2 Exchange Carrier ("ALEC") witnesses in this proceeding pertaining to the
3 systems and processes BellSouth uses to bill ALECs for the services ordered
4 from BellSouth.

5

6 **Checklist Item (i): Interconnection**

7

8 Q. ON PAGES 11 THROUGH 13 OF HIS REBUTTAL TESTIMONY,
9 WORLDCOM WITNESS MR. ARGENBRIGHT BRINGS UP AN ISSUE
10 HE DESCRIBES AS THE "TRUNK FRAGMENTATION" ISSUE. IS THIS
11 STILL AN ISSUE BETWEEN BELL SOUTH AND WORLDCOM?

12

13 A. No. As Mr. Argenbright himself describes, BellSouth makes available to
14 ALECs the "super group" which can accommodate the trunking that
15 WorldCom is seeking. The Florida Commission found in the MCI arbitration
16 proceeding (PSC Order page 82 - 83) that the proposal from BellSouth should
17 be adopted. In any event, BellSouth is at a loss as to why WorldCom continues
18 to raise issues that the companies have worked diligently with the Commission
19 to resolve.

20

21 Q. HAS ANYTHING CHANGED SINCE THE COMMISSION'S ORDER TO
22 CHANGE THE FACT THAT ADVERSE BILLING IMPACTS WOULD BE
23 SEEN IF WORLDCOM'S POSITION IS ADOPTED?

24

25

1 A. Yes. BellSouth has determined that if MCI were to use a supergroup trunk,
2 then MCI may include local, intra-LATA toll and transit traffic for calls
3 originating from MCI's local customers in Florida on the same trunk group.
4 The interconnection agreement language has been revised to reflect this fact.

5

6 Q. MR ARGENBRIGHT, ON PAGES 14 THROUGH 17 OF HIS TESTIMONY,
7 TURNS HIS ATTENTION TO THE "TANDEM PROVIDER" ISSUE. DID
8 WORLDCOM RAISE THIS ISSUE IN ITS RECENT ARBITRATIONS
9 WITH BELLSOUTH IN FLORIDA?

10

11 A. Yes.

12

13 Q. WHAT WAS THE RESULTS OF THAT ARBITRATION?

14

15 A. The Commission agreed with BellSouth that the limitations inherent in mixing
16 local and access traffic on local trunk groups would render BellSouth unable to
17 bill MCI for any of the traffic (PSC Order at page 93). In light of that and other
18 issues, the Commission ordered that MCI use access facilities in order to route
19 access traffic to BellSouth's network.

20

21 Q. HAS ANYTHING CHANGED SINCE THE COMMISSIONS ORDER TO
22 CHANGE THE FACT THAT ADVERSE BILLING IMPACTS WOULD BE
23 SEEN IF WORLDCOM'S POSITION IS ADOPTED?

24

25

1 A. No. Generally, the result would be that BellSouth would be unable to bill
2 WorldCom for its use of the local interconnection trunk. Each type of
3 interconnection facility carries with it unique characteristics with regard to the
4 recording of billing data for calls going across that facility. In the case of traffic
5 coming across WorldCom's local interconnection facilities, the call records do
6 not record information necessary to determine which calls are WorldCom's
7 local calls and which ones are access calls originating from another carrier. The
8 plain truth is that when WorldCom sends a call across its local interconnection
9 trunks, it is recorded in BellSouth's network as just that – a call originated
10 from WorldCom's local customer and sent to BellSouth. Therefore, BellSouth
11 cannot distinguish this access traffic from the other local traffic based on the
12 call records.

13

14 Q. MR. ARGENBRIGHT SUGGESTS ON PAGE 15 OF HIS TESTIMONY
15 THAT BELL SOUTH CAN ACCEPT SELF-REPORTED USAGE RECORDS
16 FROM WORLDCOM WITH WHICH TO BILL. WHAT IS BELL SOUTH'S
17 RESPONSE TO THAT PROPOSAL?

18

19 A. Mr. Argenbright's suggestion is merely a description of how the access traffic
20 could be billed to the interexchange carrier via some meet point billing
21 arrangement. What Mr. Argenbright fails to understand is that his proposal
22 would put a provider at the mercy of a customer to "self-report" usage for
23 billing back to the customer. As I mentioned earlier, when traffic is placed
24 across a local interconnection trunk, the usage records provide only enough
25 information to identify the ALEC which ordered the trunk and that a local call

1 was sent for completion. If WorldCom were allowed to mix access traffic
2 (which is to be billed to an interexchange carrier) with the local traffic (to be
3 billed to WorldCom), all of the usage records resulting from that traffic would
4 be corrupted and unusable. Therefore, BellSouth would be required to wait on
5 WorldCom to provide information as to what portion of the combined traffic is
6 real local traffic billable to WorldCom and the portion that is to be billed to the
7 other carriers. This type of "self reporting" of usage for billing creates
8 opportunities for abuse.

9
10 Other Issues

11
12 Q. AT&T WITNESS MS. SEIGLER DESCRIBES THE EXPERIENCE
13 ENCOUNTERED BY AT&T IN HAVING BILLING ACCOUNT NUMBERS
14 (BANs) ESTABLISHED. WHAT IS A BAN?

15
16 A. A BAN represents an account that is established for an ALEC and serves as a
17 means to accumulate the services for billing purposes. Generally, each month
18 an ALEC receives an invoice for each BAN that has been created. Because the
19 specifications designed by the industry for invoices differ by service, a BAN
20 will only include one type of service. For example, an ALEC would have a
21 BAN for its resale services and separate BANs for UNE-P and unbundled
22 loops.

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24 Q. WHAT IS THE PROCESS BY WHICH AN ALEC WOULD HAVE A BAN
25 ESTABLISHED?

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A. The following items must be provided before a BAN can be established for an ALEC:

- Valid contract for services to be ordered for appropriate state
- Proof of PSC Certification
- Proof of Tax Exemption
- Proof of satisfactory credit
- Operating Company Number (“OCN”)
- Blanket Letter of Authorization (“LOA”)
- Contact Number form
- Master Account Application
- Carrier Identification Code (“CIC”) if Facilities Based
- Disposition of Line Information Database (“LIDB”) Contract Negotiations

Once an ALEC has negotiated and implemented a contract for a particular service in a particular state and the other items listed above have been completed, then all of the activities needed to set up the BAN in order for the ALEC to order services under that account can be completed. The ALEC’s BAN request is used to notify the various organizations within BellSouth that the ALEC has requested a BAN and includes all of the pertinent information needed to complete the work. The request would contain various pieces of information such as the OCN (which identifies the ALEC to the various systems, etc.), type of service to be included on the BAN, etc. This process takes roughly two weeks.

1

2 Q. HAS THE ABOVE PROCESS BEEN COMMUNICATED TO
3 BELLSOUTH'S ALEC CUSTOMERS?

4

5 A. Yes. The above information along with explanations of the forms and actions
6 required for establishing billing accounts are located in the BellSouth ALEC
7 Start-up Guide on the BellSouth Interconnection web site at
8 www.interconnection.bellsouth.com. Members of the BellSouth account teams
9 and the BellSouth Interconnection department also communicate this
10 information to BellSouth's ALEC customers.

11

12 Q. THROUGHOUT HER TESTIMONY ON THIS ISSUE, MS. SEIGLER
13 INSINUATES THAT AT&T WAS MAKING A STANDARD REQUEST
14 FOR NEW BANs AND THAT BECAUSE OF THE DIFFICULT AND
15 BURDENSOME PROCESS USED BY BELLSOUTH, THE REQUEST
16 TOOK AN INORDINATE AMOUNT OF TIME. IS THIS TRUE?

17

18 A. No. The referenced request made by AT&T was anything but standard.
19 Problems were encountered with the request for two main reasons. First,
20 AT&T did not follow the above process for establishing BANS. More
21 specifically, when AT&T first requested UNE-P service for Georgia and
22 Florida, it was discovered that they did not have a contract for this type of
23 service in these states. Second, AT&T did not communicate their plan for
24 requesting new UNE-P service in additional states to BellSouth in a timely
25 manner. If the plan had been communicated by AT&T in advance as opposed

1 to at the time that they wanted to begin issuing orders, the process would have
2 gone more smoothly.

3

4 Q. HOW MANY BANs HAS BELLSOUTH SET UP FOR ALECs IN
5 FLORIDA?

6

7 A. Currently there are over 1,300 BANs set up for ALECs in Florida and well
8 over 3,500 established in the BellSouth region. The process works very
9 smoothly and efficiently when the procedures are followed as they have been
10 designed.

11

12 Q. WHAT STEPS HAS BELLSOUTH TAKEN TO INSURE THAT FUTURE
13 REQUESTS FROM AT&T FOR BAN's ARE SUCCESSFUL?

14

15 A. First, the BellSouth account team met with AT&T to discuss the BAN process.
16 In response to action items assigned in that meeting, the BellSouth account
17 team provided AT&T with information which can be used in conjunction with
18 the Start-Up Guide to make sure that there is no misunderstanding of what
19 must be accomplished for AT&T to establish BAN's in other states. Second, a
20 flow chart of activities to be performed and roles both BellSouth and AT&T
21 must play was developed and provided to AT&T. Lastly, BellSouth has agreed
22 to meet with AT&T to conduct a joint planning session to further insure that all
23 of the actions needed to be taken in future market entries are completed as per
24 the process that has been established.

25

1 Q. MCI (LICHTENBERG AFFIDAVIT AT PARA. 18) BRINGS UP AN ISSUE
2 SURROUNDING THE "HOLD FILE". WHAT IS THE "HOLD FILE"?

3

4 A. The hold file is a generic term that relates to a service order error correction
5 process that takes place between the time an order has completed the
6 provisioning steps and the time the billing system attempts to update the
7 Customer Service Record (CSR) with the information on the order. As the
8 billing system processes the order, it can detect errors that prevent the order
9 from being updated to the various databases supporting billing. The order is
10 sent to a database (called the "hold file") and needed correction activities are
11 performed. On average, about one-half of one percent of all orders are found to
12 have errors and corrected through this process.

13

14 Q. MS. LICHTENBERG DESCRIBES THREE NEGATIVE IMPACTS THAT
15 HOLD FILE PROCESSING HAS ON ALEC OPERATIONS. WOULD YOU
16 ADDRESS EACH OF THESE?

17

18 A. Yes. First, Ms. Lichtenberg claims that the delays in correcting the errors found
19 in the hold file process "prevents customers from receiving MCI branding on
20 their OS/DA calls". This is not true. Because the errors detected during the
21 hold file process occur after any and all provisioning steps are complete, the
22 services being requested on those orders (including branding of OS/DA calls
23 via OLNS) would have already been set up in the network. Second, Ms.
24 Lichtenberg states that the hold file error correction process causes customers
25 to be double billed (i.e., BellSouth continues to bill the end user and the ALEC

1 bills the end user). To address this, BellSouth organizes its order correction
2 activities for both retail and wholesale orders by billing periods. Those orders
3 affecting customers whose bills will be produced earliest will be worked first.
4 In that way the risk of double billing is minimized. If a service order is not
5 updated before a bill has been created for the customer, then as the order is
6 posted to the customer's account a credit is electronically generated to account
7 for the delay in updating the customer's records and included on the customer's
8 next (and generally final) bill from BellSouth. Lastly, Ms. Lichtenberg claims
9 that the delays risk "potential service disruption". Ms. Lichtenberg provides no
10 details as to the service orders mentioned in her testimony nor what type of
11 service disruption to which she is referring. However, since the hold file errors
12 are detected after all of the provisioning steps have completed, the impact of
13 the error correction activities would be limited to the customer service record
14 and service disruption would not occur.

15
16 Q. ARE THE ERROR CORRECTION PROCESSES FOR ALEC ORDERS
17 IDENTICAL TO THE PROCESSES USED FOR RETAIL ORDERS?

18
19 A. Yes. Obviously, if an error is detected on a service order, some amount of time
20 will be spent in correcting those errors. However, this is true for both retail
21 service orders as well as ALEC orders. As I described in my direct testimony in
22 this proceeding, the service order processes in the billing systems operate on
23 ALEC transactions (such as service orders) in the same manner as retail
24 transactions. The hold file error correction activities are identical for ALEC
25 orders as for retail orders.

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2 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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4 A. Yes.

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