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**BELLSOUTH TELECOMMUNICATIONS, INC.**  
**DIRECT TESTIMONY OF WILLIAM VICTOR ATHERTON, JR.**  
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 960846-TP**  
**SEPTEMBER 9, 1996**

Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. (HEREINAFTER REFERRED TO AS "BELLSOUTH" OR "THE COMPANY").

A. My name is William Victor Atherton, Jr. My business address is 3535 Colonnade Parkway, Birmingham, AL 35243. I am a Manager in the Infrastructure Planning organization of the Network and Technology Group.

Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. I currently have the responsibility of leading the BellSouth Technical Negotiations Team. This team comprises technical experts of various disciplines that design, develop and negotiate the interconnection arrangements with facilities-based Alternative Local Exchange Companies ("ALECs"). The interconnection issues addressed by this team may be grouped into three distinct categories: 1) network interconnection, including all trunking and signaling necessary for intercompany traffic flow; 2) portability of telephone numbers; and, 3)

1 unbundled network elements. Consistent with the Telecommunications  
2 Act of 1996 (hereinafter referred to as the "Act"), the Company has  
3 been negotiating these issues with MCI in good faith since their first  
4 request in September, 1995.

5

6 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

7

8 A. I graduated from the University of Louisville with the degree of Bachelor  
9 of Applied Science. In addition, I earned the Masters of Electrical  
10 Engineering Degree from Speed Scientific Graduate School of the  
11 University of Louisville. I am a licensed Professional Engineer in the  
12 branch of Electrical Engineering, member of the Sigma Xi and Eta  
13 Kappa Nu Engineering Honor Societies, and a member in the National  
14 and Alabama Societies of Professional Engineers.

15

16 I began my career with South Central Bell in 1979 as an engineer in the  
17 Electronic Switching Systems Group. In this assignment, I was  
18 responsible for engineering the growth and replacement of these  
19 systems. In 1984, I joined the Headquarters Staff organization where I  
20 studied emerging telecommunications technologies, making specific  
21 deployment recommendations to the Company. In 1985, I assumed the  
22 position of Project Manager for 800 Service Database. In this role, I  
23 was active in Company and industry forums and was responsible for  
24 technical analysis, while negotiating the successful implementation of  
25 the national system. During 1987, I was appointed Technical Product

1           **Manager for Open Network Architecture and Interconnector Switched**  
2           **Access Services. This included involvement in the Federal**  
3           **Telecommunications System (FTS2000) and the National Emergency**  
4           **Telecommunications System (NETS). I assumed my present position**  
5           **in March, 1995.**

6

7   **Q.    WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8

9   **A.    The purpose of my testimony is to present BellSouth's position on the**  
10       **issue of appropriate trunking arrangements between MCI and the**  
11       **Company for local interconnection.**

12

13   **Q.    PLEASE DESCRIBE HOW BELLSOUTH WILL INTERCONNECT**  
14       **WITH FACILITIES-BASED ALECS.**

15

16   **A.    BellSouth has designed an interconnection architecture that**  
17       **accommodates local, intraLATA, access, operator services and E911**  
18       **traffic utilizing both one-way and two-way trunking as necessary for**  
19       **appropriate detailed recording and administration. In the Company's**  
20       **arrangement, BellSouth local and intraLATA traffic types are routed**  
21       **over the same one-way trunk group. Similarly, the ALEC local and**  
22       **intraLATA traffic is routed over a single one-way group. Access traffic,**  
23       **as well as all other traffic utilizing the BellSouth intermediary tandem**  
24       **switching function, is routed via a single two-way trunk group. This**  
25       **arrangement is depicted by the generic BellSouth architecture in**

1 Attachment WVA-1 and the specific MCI architecture for the Atlanta  
2 area in Attachment WVA-2.

3

4 Q. WHY DOES BELLSOUTH REQUIRE ONE-WAY TRUNKING FOR  
5 LOCAL AND INTRALATA TRAFFIC?

6

7 A. BellSouth requires one-way trunking for local and intraLATA traffic in  
8 order to: 1) properly measure and record the specific traffic types, and  
9 2) administer the trunk groups in a clean, non-controversial and  
10 economic manner.

11

12 Q. PLEASE EXPLAIN YOUR ANSWER.

13

14 A. The one-way trunk groups established for the mutual exchange of local  
15 and intraLATA traffic are required to distinctly and accurately measure  
16 and record the originating and terminating usage. There are two  
17 unique trunk types used in the one-way trunking arrangement. Intertoll  
18 ("IT") trunks are used for traffic originating in BellSouth's network and  
19 terminating to the ALEC network. This trunk type allows for a usage  
20 recording to be made in the switch where the call originates. Access-  
21 to-Carrier ("ATC") trunks are used for traffic originating in the ALEC  
22 network and terminating to the BellSouth network. This trunk type  
23 allows for a usage recording to be made in the switch where the call  
24 terminates. If the IT trunk type were to be configured as a two-way  
25 group, usage recording capability would not be possible in the receiving

1 direction. If the ATC trunk type were to be configured as a two-way  
2 group, a usage recording could conceivably be made in the originating  
3 direction, but it would require that calls originating from the BellSouth  
4 network be designated as interexchange access traffic, not local traffic.  
5 Clearly, one-way trunking, using appropriate trunk types, results in the  
6 most accurate usage measurement recording capability for each  
7 interconnecting company.

8  
9 In addition to the recording and billing issues associated with two-way  
10 trunks, there are cost considerations and potential administrative  
11 difficulties. Historically, when contrasted to one-way trunking  
12 arrangements, two-way shared arrangements have been much more  
13 labor-intensive and costly to maintain. Upward trends in labor cost  
14 versus downward trends in trunk hardware costs indicate that this will  
15 continue to be the case. In other words, it is less expensive to  
16 interconnect with a slightly larger one-way trunk group than to  
17 administer a two-way group.

18

19 Q. DOES BELLSOUTH HAVE EXPERIENCE TO SUPPORT ITS  
20 POSITION?

21

22 A. Yes. At divestiture, BellSouth and AT&T had a shared trunking  
23 network. A portion of each trunk group was allocated to AT&T as its  
24 share of switched access service. As the traffic volume increased,  
25 administration of the trunk groups became difficult. Liability for the

1 increase in traffic could not be determined, so when the trunk groups  
2 became incapable of handling additional volume, it was unclear and  
3 somewhat controversial as to which company should be responsible for  
4 adding trunks to the group. Controversy and confusion also existed  
5 over accountability for the shared trunk groups' mechanized servicing  
6 system, engineering procedures, forecasting methods and traffic  
7 routing. All of this contributed to increased costs and decreased  
8 service reliability.

9

10 Q. HOW WAS THE SITUATION RESOLVED?

11

12 A. Over time, this situation was resolved by disaggregating trunks into  
13 their distinct elements and eliminating the shared arrangement.  
14 BellSouth does not want to enter into the same situation as was  
15 experienced with AT&T at divestiture. The shared two-way local  
16 interconnection architecture would result in similar billing disputes, call  
17 blocking and other administrative problems, adversely affecting the  
18 network and ultimately the subscriber. Experience and empirical data  
19 have shown that separately provisioned facilities and one-way trunks  
20 result in clear accountability for forecasting, failure resolution and  
21 capacity additions. In fact, the FCC First Report and Order, CC Docket  
22 96-98 states in paragraph 202 that "Each carrier must be able to retain  
23 responsibility for the management, control, and performance of its own  
24 network."

25

1 Q. HAS MCI AGREED TO THE BELLSOUTH INTERCONNECTION  
2 ARCHITECTURE?

3

4 A. Yes. As shown in Attachment WVA-2, MCI has developed a trunking  
5 architecture that is identical to the BellSouth proposal.

6

7 Q. PLEASE SUMMARIZE YOUR POSITION ON TRUNK  
8 INTERCONNECTION ARRANGEMENTS.

9

10 A. BellSouth's interconnection architecture is based on certain recording,  
11 cost and administrative requirements that are necessary within a  
12 competitive environment. Accordingly, BellSouth and MCI technical  
13 experts have agreed to utilize one-way trunking as the appropriate  
14 arrangement for originating local and intraLATA traffic. BellSouth  
15 believes that parties should be free to work together to review,  
16 continually analyze and determine the best and most efficient  
17 interconnection architectures within the evolving parameters set by  
18 local competition. Such arrangements should not be mandated.

19

20 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

21

22 A. Yes.

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