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GTE FLORIDA INCORPORATED

REBUTTAL TESTIMONY OF MICHAEL DREW

DOCKET NO. 960980-TP 960847

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Michael Drew. My business address is 600 Hidden Ridge, Irving, TX 75038.

Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

A. I am employed by GTE Telephone Operations as Group Product Manager-Network Interconnection for GTE Telephone Operations.

Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.

A. I graduated from Harding University with a Bachelor of Science Degree in Business Administration in 1972. After graduation, I joined General Telephone Company of Illinois and held positions of increasing responsibility in the Market Forecasting, business Assessment, Product Development, and Product Management areas of various GTE companies until 1989. In October 1989, I became the Group Product Manager-ONA Implementation. In that capacity, I was responsible for supervising a group that supported the planning and implementation of GTE's Open Network Architecture (ONA) requirements of the Federal Communications Commission and state

DOCUMENT NUMBER - DATE
10485 SEP 30 88

1 public utilities commissions (PUCs) in the states where GTE
2 operates. In August 1993, I was appointed to my current position of
3 Group Product Manager-Network Interconnection.

4

5 **Q. WHAT ARE YOUR RESPONSIBILITIES AS GROUP PRODUCT**
6 **MANAGER-NETWORK INTERCONNECTION?**

7 A. I am responsible for the continued compliance with the FCC and state
8 PUC ONA Orders as well as the planning and implementation of
9 operations support systems (OSS) access requirements. In addition,
10 I am the GTE representative in various industry ONA forums such as
11 the Information Industry Liaison Committee (IILC). As such, I am very
12 familiar with the FCC's previous OSS access requirements under the
13 ONA orders and the issues worked on at the IILC regarding access
14 to OSS functionality for enhanced services providers.

15

16 **Q. DID YOU FILE DIRECT TESTIMONY IN THIS PROCEEDING?**

17 A. No, I did not. However, I am adopting the Direct Testimony of GTEFL
18 witness Rodney Langley in this proceeding. This witness substitution
19 is necessary because the GTE Operating Companies are involved in
20 numerous concurrent proceedings with various companies around the
21 country. Given this situation, it is inevitable--as is the case here--that
22 scheduling conflicts will occur for the few witnesses who can testify
23 to a particular subject.

24

25 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

1 A. The purpose of my rebuttal testimony is to respond to MCI's positions
2 associated with Operating Support Systems (OSS).

3

4 **Q. SHOULD GTEFL BE REQUIRED TO PROVIDE SERVICES THAT**
5 **EXCEED BOTH INDUSTRY AND COMMISSION STANDARDS OF**
6 **QUALITY AS IMPLIED BY MR. DECAMP IN HIS TESTIMONY ON**
7 **PAGE 7, LINES 7-9?**

8 A. No. The FCC Order does not require that GTEFL provide services at
9 a different quality than it provides for itself or its customers. GTEFL
10 abides by the Florida Commission quality requirements and will
11 provide the same for MCI's customers.

12

13 **Q. WILL GTEFL PROVIDE ACCESS TO ITS OSS FUNCTIONS TO**
14 **PROVIDE SERVICES TO MCI'S CUSTOMERS IN A NON-**
15 **DISCRIMINATORY MANNER WITH RESPECT TO THE CONCERNS**
16 **ADDRESSED BY MR. DECAMP IN HIS TESTIMONY ON PAGE 7,**
17 **LINES 20-24?**

18 A. Yes, GTEFL will provide access to its OSS functions. GTEFL will use
19 the same pre-ordering, ordering, provisioning, maintenance and
20 repair and billing systems and databases that it provides to itself or
21 its customers for the unbundled and resold services purchased by
22 MCI.

23

24 **Q. IN HIS TESTIMONY ON PAGE 8, LINES 2-6, MR. DECAMP USES**
25 **THE FCC ORDER TO IMPLY THAT ACCESS TO GTEFL'S OSS BY**

1 **JANUARY 1, 1997, FOR THE PROVISION OF LOCAL SERVICE**
2 **THROUGH UNBUNDLING AND RESALE, IS TECHNICALLY**
3 **FEASIBLE. IS THIS TRUE FOR GTEFL?**

4 A. No. Access to the OSS functions in the provision of interexchange
5 access services for IXC's cannot be used by GTEFL for the ordering,
6 provisioning, and billing of local services. GTEFL will provide access
7 to its OSS functions for provision of unbundled and resold services
8 as described here. The OSS systems and databases used by GTEFL
9 in the provision of local services were built to be accessed by a single
10 provider, not multiple providers. It is not technically feasible to
11 provide direct access to these systems and databases to providers
12 other than GTEFL at this time. If direct access were provided at this
13 time, network security and customer privacy would be compromised.
14 Upon request and payment by an alternative local exchange carrier,
15 GTEFL will develop access to the requested capabilities via a
16 nationally standardized gateway for providers other than GTEFL.

17
18 **Q. DOES GTEFL HAVE CONCERNS SIMILAR TO THOSE**
19 **EXPRESSED BY MR. DECAMP IN HIS TESTIMONY ON PAGE 8,**
20 **LINES 14-16, THAT THERE IS AN ADVERSE POTENTIAL FOR**
21 **MULTIPLE UNIQUE SYSTEM-TO-SYSTEM INTERFACE**
22 **GATEWAYS IN THE INDUSTRY?**

23 A. Yes. GTEFL anticipates having to interconnect and interact with
24 several competitive local exchange carriers. It would be extremely
25 inefficient and costly if GTEFL were required to develop and support

1 several different system-to-system interface arrangements. GTEFL
2 is very supportive of delaying development of a gateway until the
3 industry defines the standards for all local exchange carrier OSS
4 interconnections.

5

6 **Q. WHEN WILL A NATIONAL STANDARDIZED GATEWAY, FOR USE**
7 **BY ALL PROVIDERS OF LOCAL SERVICE AND REFERENCED BY**
8 **MR. DECAMP FROM THE FCC ORDER IN HIS TESTIMONY ON**
9 **PAGE 8, LINES 21-25, BE AVAILABLE?**

10 A. It is anticipated at this time that the industry will define the electronic
11 bonding standards during 1997.

12

13 **Q. WITH RESPECT TO MR. DECAMP'S CONCERN IN HIS**
14 **TESTIMONY ON PAGE 10, LINES 6-9, WILL GTEFL PROVIDE**
15 **ACCESS TO THE SAME ORDERING PROCEDURES AND**
16 **FUNCTIONS AS IT PROVIDES TO ITSELF?**

17 A. Yes. As described in my testimony, GTEFL has established a
18 dedicated National Open Market Center (NOMC) to place MCI orders
19 into the same ordering and provisioning system that GTEFL uses for
20 itself and its customers. For simple service orders, the NOMC
21 representative will provide MCI the customer's telephone number and
22 installation due date while MCI is on-line with their customer. Service
23 orders, using the standardized Local Service Request (LSR) form
24 developed by the industry at the Ordering and Billing Forum (OBF),
25 can be transmitted by MCI to the NOMC via an electronic interface

1 using Network Data Mover (NDM) protocol. The LSR information is
2 entered into the ordering system and completed via current GTEFL
3 processes.

4

5 For complex orders, the NOMC representative will provide the
6 telephone number(s) and due date to MCI via the firm order
7 confirmation (FOC). This is the same process that GTEFL provides
8 for itself and its customers for complex orders.

9

10 **Q. WILL GTEFL ESTABLISH AN MCI CUSTOMER ACCOUNT**
11 **"IMMEDIATELY" WHILE A CUSTOMER IS ON-LINE WITH THE MCI**
12 **REPRESENTATIVE, JUST AS IT WOULD DO FOR ITS OWN**
13 **CUSTOMERS, AS DISCUSSED BY MR. DECAMP IN HIS**
14 **TESTIMONY ON PAGE 10, LINES 12-14?**

15 **A.** Yes. As described in my testimony for new service/install requests,
16 the NOMC representative will create an MCI customer account while
17 on line with the MCI representative and place the account and order
18 into the system in suspension until the completed valid LSR is
19 received from MCI. Once the order is received, the NOMC
20 representative will release the order for provisioning. This is the
21 same process that GTEFL performs for itself and its customers.

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24 **Q. ON PAGE 10, LINES 15-20 OF HIS TESTIMONY, MR. DECAMP**
25 **IMPLIES THAT REAL-TIME DIRECT ACCESS TO GTEFL'S**

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**SYSTEMS IS REQUIRED TO PERFORM THIS ORDERING
FUNCTION. IS THAT TRUE?**

A. No. The MCI representative will interact with the MCI customer in the same way a GTEFL customer interacts with the GTEFL customer representative. Direct access to GTEFL's systems is not required to take an order from a customer.

**Q. WILL GTEFL PROVIDE EFFICIENT ORDERING AND
PROVISIONING SYSTEMS IF IT DOES NOT PROVIDE REAL-TIME
DIRECT ELECTRONIC INTERFACES TO ITS ORDERING AND
PROVISIONING SYSTEMS?**

A. Yes. The fact that MCI is in a middle step in the process is not a serious threat to efficiency. There is a requirement for the MCI representative to interact with the NOMC representative to establish the customer account, obtain a telephone number assignment, and due date assignment. Any time required for the MCI representative to place the customer on hold while conversing with the NOMC representative will be insignificant to the MCI customer. In fact, there are times that the GTEFL representative must place its own customer on hold when contacting facility assignment to obtain telephone number and due date assignment when systems cannot provide the information. The GTEFL representative will create an account for the MCI customer's order in the system and will initiate provisioning once a valid Local Service Request (LSR) is received from MCI.

1 Q. DOES GTEFL ALSO PLACE ITS CUSTOMERS ON HOLD WHEN
2 DETERMINING TELEPHONE NUMBER ASSIGNMENT AND DUE
3 DATE ASSIGNMENT?

4 A. Sometimes. These pre-ordering functions are not mechanized in all
5 areas of GTE and GTEFL must place the customer on hold while
6 these assignments are determined through manual processes. Also,
7 in the areas where these pre-ordering functions are mechanized, at
8 times there is a requirement to place the customer on hold and
9 contact manual processes because the telephone number database
10 is exhausted, the customer wants a "vanity" telephone number, or
11 there are unique circumstances that alter the automated due date
12 assignment process.

13
14 Q. WHAT IS GTE DOING TO ADDRESS IMPROVEMENTS IN
15 EFFICIENCY FOR PRE-ORDERING?

16 A. GTE is currently investigating the expansion of its mechanized
17 capabilities for telephone number assignment and due date
18 assignment nationwide. GTE is also investigating access to these
19 mechanized capabilities by alternative local exchange carriers.

20
21 Q. WOULD THIS MECHANIZATION ELIMINATE THE NEED FOR A
22 MCI REPRESENTATIVE TO SPEAK WITH A NOMC
23 REPRESENTATIVE TO OBTAIN TELEPHONE NUMBER
24 ASSIGNMENTS AND DUE DATE ASSIGNMENTS?

25 A. No. These mechanized processes are only effective for simple

1 single-line services and will not work for complex services. For
2 complex services, MCI will be required to submit a valid LSR and
3 customer (end-user) data sheet. GTEFL will provide telephone
4 numbers and due date on the FOC.

5

6 **Q. MR. DECAMP IMPLIES THAT GTEFL SHOULD BE REQUIRED TO**
7 **TRANSFER A GTEFL CUSTOMER'S ACCOUNT TO MCI "AS-IS"**
8 **ON PAGE 11, LINES 14-17 OF HIS TESTIMONY. DOES GTEFL**
9 **AGREE WITH THIS PROPOSAL?**

10 A. No. GTE believes that the customer should be in control of their
11 GTEFL account information and that MCI should work with their new
12 customer to determine the services they desire from MCI. GTEFL will
13 not compromise the customer's privacy and will only provide the
14 customer's account information to MCI upon written authorization
15 from the customer.

16

17 **Q. ON PAGE 12, LINES 4-7, MR. DECAMP IMPLIES THAT THE**
18 **SWITCH OVER OF CUSTOMERS FOR LOCAL SERVICE IS AS**
19 **SIMPLE AS THE SWITCH OF END USERS BETWEEN**
20 **INTEREXCHANGE CARRIERS (I.E., PIC CHANGE). IS THIS**
21 **TRUE?**

22 A. No. A PIC change is controlled through a separate operation support
23 system than local services and only involves a change in the switch
24 to route the customer's outgoing interexchange calls to the proper
25 interexchange carrier's network and the billing information. The

1 change of a customer's local exchange service is more complicated
2 and involves several GTEFL operation support systems to assign
3 local outside plant facilities, make multiple changes in the switching
4 database, and changes in the billing system.

5

6 **Q. WILL GTEFL ALLOW NON-GTE ACCESS TO ITS PROVISIONING**
7 **SYSTEMS, AS REQUESTED BY MR. DECAMP IN HIS TESTIMONY**
8 **ON PAGE 12, LINES 14-18, PRIOR TO THE DEVELOPMENT OF A**
9 **SYSTEM-TO-SYSTEM STANDARD GATEWAY?**

10 A. No. The FCC Order did not relinquish control of the network to
11 alternative local exchange carriers. GTEFL is responsible for the
12 provision of its network facilities. GTEFL will not provide network
13 control functionality through a system-to-system standard gateway,
14 but may provide access to installation information if requested and
15 paid for by MCI.

16

17

18 **Q. IS A NEW GTEFL REPORTING REQUIREMENT NECESSARY TO**
19 **PROVE NONDISCRIMINATION IN PROVISIONING AS IMPLIED BY**
20 **MR. DECAMP IN HIS TESTIMONY ON PAGE 12, LINES 22-25?**

21 A. No. GTEFL's provisioning processes for single-line services are
22 highly automated with little opportunity for human intervention in the
23 process. This automation precludes the opportunity for discriminatory
24 activity and GTEFL should not be required to develop non-existing
25 reports to prove non-discrimination. GTEFL does not process orders

1 based on customer identity and GTEFL will process MCI's orders in
2 the same manner as it does for itself or its customers.

3

4 **Q. WILL GTEFL ALLOW A NON-GTE COMPANY TO HAVE ACCESS**
5 **TO ITS NETWORK VIA REPAIR SYSTEMS AS REQUESTED BY**
6 **MR. DECAMP IN HIS TESTIMONY ON PAGE 13, LINES 12-14?**

7 A. No. GTEFL cannot compromise the security of its network or its
8 proprietary customer information by allowing access by companies
9 other than GTE to the network via GTEFL's repair systems. The FCC
10 Order did not relinquish control of the network to alternative local
11 exchange carriers.

12

13 **Q. WILL GTEFL ALLOW A NON-GTE COMPANY TO HAVE REAL-**
14 **TIME DIRECT ACCESS TO ITS MAINTENANCE AND REPAIR**
15 **SYSTEMS, AS REQUESTED BY MR. DECAMP IN HIS TESTIMONY**
16 **ON PAGE 13, LINES 24-25 AND PAGE 14, LINES 1-2?**

17 A. No. The FCC Order did not relinquish control of the network to
18 alternative local exchange carriers. GTEFL is responsible for the
19 repair of its network facilities. GTEFL will not provide repair control
20 functionality through a system-to-system standard gateway, but may
21 provide access to repair status information if requested and paid for
22 by MCI.

23

24 **Q. IS A NEW GTEFL REPORTING REQUIREMENT NECESSARY TO**
25 **PROVE NONDISCRIMINATION IN MAINTENANCE AND REPAIR AS**

1 **IMPLIED BY MR. DECAMP IN HIS TESTIMONY ON PAGE 14,**
2 **LINES 2-6?**

3 A. No. GTEFL does not process repair tickets based on customer
4 identity and GTEFL will process MCI's tickets in the same manner as
5 it does for itself or its customers. GTEFL's processes preclude the
6 opportunity for discriminatory activity and GTEFL should not be
7 *required to develop non-existing reports to prove non-discrimination.*

8

9 **Q. WILL GTEFL USE A CABS-LIKE BILLING SYSTEM FOR**
10 **CHANGES TO MCI AS REQUESTED BY MR. DECAMP IN HIS**
11 **TESTIMONY ON PAGE 14, LINES 12-14?**

12 A. No. As described in my Direct Testimony, GTEFL will provide billing
13 to MCI via the CBSS system which is the same system used by
14 GTEFL to bill its customers for local services. GTEFL will create a
15 bill to MCI for resold services and unbundled elements along with a
16 summary bill master. GTE is working to provide a CABS/CABS-like
17 solution to handle both trunk-side and line-side billing.

18

19 **Q. WILL GTEFL PROVIDE END USER BILLING INFORMATION IN A**
20 **TIMELY MANNER AS REQUESTED BY MR. DECAMP ON PAGE**
21 **14, LINES 21-25 OF HIS TESTIMONY?**

22 A. Yes. Daily file records on MCI's accounts will be generated and
23 transmitted electronically to MCI.

24

25

1 Q. HAS MCI REQUESTED ACCESS TO THE SPECIFIC GTEFL'S OSS
2 FUNCTIONS AS AN UNBUNDLED ELEMENT LISTED ON PAGES
3 14 -17 OF MR. DECAMP'S TESTIMONY AND EXPRESSED A
4 WILLINGNESS TO PAY FOR THE ACCESS OR DEVELOPMENT?

5 A. No.

6

7 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

8 A. Yes, it does.

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