

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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3 **IDS TELCOM, LLC**

4
5 **DIRECT TESTIMONY OF KEITH KRAMER**

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8 **IN RE: INVESTIGATION INTO THE ESTABLISHMENT OF OPERATIONS**
9 **SUPPORT SYSTEMS PERMANENT PERFORMANCE MEASURES FOR**
10 **INCUMBENT LOCAL EXCHANGE TELECOMMUNICATIONS COMPANIES.**
11 **DOCKET NO. 000121-TP**
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14 **Q: PLEASE STATE YOUR FULL NAME AND BUSINESS ADDRESS FOR**
15 **THE RECORD.**

16 A: My name is Keith Kramer, Senior Vice President of IDS Telcom, LLC, located
17 at Miami, Florida.

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19 **Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND**
20 **AND EXPERIENCE.**

21 A. I began my telecommunications career in 1994 as Director of Sales and
22 Marketing at IDS. I have a Bachelors Degree in Business from the University
23 of Miami, a Master's Degree from Florida International University and over 15
24 years experience in retail sales and marketing.

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26 **Q: COULD YOU PLEASE DESCRIBE BRIEFLY THE SCOPE OF YOUR**
27 **CURRENT RESPONSIBILITIES AT IDS?**

28 I am responsible for product development and promotion for IDS.

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FPSC-RECORDS/REPORTING

1 I have developed the sales division and managed the staff, at IDS producing
2 an astounding revenue growth of \$1.2 million to \$40 million per year. More
3 recently, I led the company's UNE-P development along with Operator
4 Services and interface systems between IDS and BellSouth
5 Telecommunications, Inc. ("BellSouth"). I have negotiated the UNE contracts
6 with BellSouth, Bell Atlantic and Southwestern Bell which led to my promotion
7 to the position of Senior Vice President. I am currently responsible for all
8 interconnection agreements, regulatory issues such as tariffs and certification
9 in other states and the network planning for implementing the expansion of
10 IDS.

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12 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 A: I am testifying on behalf of IDS Telcom, LLC ("IDS"), an alternative local
14 exchange company ("ALEC") certificated and operating in the State of Florida.
15 As an alternative local exchange company operating in Florida and providing
16 telecommunications services to business customers, IDS must purchase
17 telecommunications services on a resale and unbundled network element
18 (UNE) basis from incumbent local exchange carriers such as BellSouth and
19 Sprint. IDS must provision those resale services and UNEs through use of
20 the incumbent local exchange carriers' operations support systems (OSS).
21 Therefore, performance metrics set by the Commission in this proceeding will
22 directly and substantially affect IDS' ability to provide services to Florida

1 consumers. Therefore, IDS has an important and substantial interest in this
2 proceeding.

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4 **Q: PLEASE SUMMARIZE YOUR TESTIMONY.**

5 A: IDS has experienced tremendous difficulties with the OSS provided by
6 BellSouth in terms of the provisioning of telecommunications services for
7 resale and the provisioning of UNEs. IDS has had extensive experience in
8 the use of BellSouth's OSS and has found that BellSouth's OSS continues to
9 cripple IDS' operations and to completely hinder any possibility of the
10 development of competition in the local exchange services market. Any
11 performance measures adopted by the Commission must be easily
12 understandable, enforceable and verifiable, and must provide for serious
13 ramifications in the event of BellSouth's continued failure to meet its
14 obligations regarding the provision of OSS that are at parity with its internal
15 OSS.

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17 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

18 A: Yes, it does