BEFORE THE PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc. N/K/A IDS Telcom, L.L.C., Against BellSouth Telecommunications, Inc., and Request for Emergency Relief	)))))	DOCKET NO. 010740-TP FILED: SEPTEMBER 5, 2001

REBUTTAL TESTIMONY

OF

WILLIAM P. GULAS AND BECKY WELLMAN

ON BEHALF OF

IDS TELCOM, L.L.C.

Q. MR. GULAS, PLEASE STATE YOUR NAME AND YOUR BUSINESS ADDRESS.

A. My name is William P. Gulas. My business address is 1525 N.W. 167th Street, Miami, Florida 33169.

Q FOR WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

A. I am employed by IDS. My position with IDS is Vice President of Local Services.

Q. PLEASE DESCRIBE YOUR DUTIES AT IDS.

A. My duties and functions include responsibility for negotiating and administering interconnection agreements between IDS and Incumbent Local Exchange Carriers ("ILECS") and dealing with regulatory issues. I also have been responsible for supervising the ordering and customer service operations.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

A. I hold a Masters Degree in Marketing and an undergraduate degree in Business Administration from the University of Alabama, as well as a Masters Certificate in Project Management from George Washington University.

Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE AS IT APPLIES TO YOUR QUALIFICATIONS TO ADDRESS THE SUBJECT MATTER OF YOUR TESTIMONY?

A. Before joining IDS, I worked for 11 years at BellSouth Telecommunications, Inc. ("BellSouth"), most recently as a product manager for BellSouth's switched combination services, or what is known in the industry as the UNE-P product. As product manager, I designed the product, wrote the marketing plan, guided the product team through its development of the service, and educated both senior BellSouth management and its sales force about the product.

I also was involved with negotiating for BellSouth interconnection agreements with Alternative Local Exchange Carriers ("ALECs"), including AT&T, WorldCom, and Sprint, and I helped the sales force by making presentations to customers about the product and answering their questions.

Before becoming a product manager, I worked in the competitive analysis and market research groups in BellSouth, and as such am very familiar with the telecommunications competitive landscape.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. No.

Q. MS. WELLMAN, PLEASE STATE YOUR NAME AND YOUR BUSINESS ADDRESS.

A. My name is Becky Wellman. My business address is 1525 N.W. 167th Street, Miami, Florida 33169.

Q IN YOUR DIRECT TESTIMONY, YOU STATED THAT YOU ARE EMPLOYED BY IDS AS ASSISTANT VICE PRESIDENT OF LOCAL OPERATIONS. IN ADDITION TO THE JOB DUTIES YOU IDENTIFIED IN YOUR DIRECT TESTIMONY, PLEASE DESCRIBE ANY ADDITIONAL DUTIES RELEVANT TO YOUR TESTIMONY IN THIS PROCEEDING.

A. In addition to what I stated in my earlier testimony, I also represent IDS in the national Ordering and Billing Forum, the BellSouth Change Control Process, the BellSouth UNE-P user group and the BellSouth Flow-Through Task Force.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS ARBITRATION?

A. Yes. I filed direct testimony in this case on July 23, 2001.

Q. MR. GULAS, WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut many of the assertions in the direct and rebuttal testimony of BellSouth witnesses regarding Issue One ("Has BellSouth breached its Interconnection Agreement with IDS by failing to provide IDS OSS at parity?) and Issue Two ("Has BellSouth breached its Interconnection Agreement with IDS by failing to provide IDS UNE-P at parity?) filed with the Florida Public Service Commission on August 20 and 27, 2001. I will address the OSS used by BellSouth to process IDS's orders that place IDS at a competitive disadvantage.

Q. MS. WELLMAN, WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony also is to rebut assertions in the direct and rebuttal testimony of BellSouth witnesses regarding Issue One and Issue Two. However, I will address, in particular, how the existing BellSouth OSS used to process IDS's and other ALECs customer requests work, and how alternative and better systems, which BellSouth chooses not to use for ALEC business, work.

Q. MR. GULAS, DO YOU HAVE ANY OVERALL OBSERVATIONS CONCERNING THE OSS AND UNE-P ISSUES?

A. Yes. IDS is dependent on BellSouth. If a BellSouth customer wants to switch service to IDS or if an IDS resale customer wants to switch to UNE-P

service, IDS must rely on BellSouth to help accomplish the switch. However, IDS regularly encounters OSS-related problems during this process. These problems arise because BellSouth has made deliberate decisions to utilize inferior systems that require ALECs to jump through a variety of hoops in order to process each customer conversion request. Each step along the way introduces a greater risk of error, the need for human intervention, and service problems and delays affecting the ALEC customers directly. For IDS's customers, the consequences include delays in having their service requests completed and sometimes even the loss of service; for IDS, the consequences include the loss of customers.

What is particularly disturbing is that BellSouth currently has the ability to correct this situation, but it chooses not to do so. BellSouth presently has certain ordering systems that, if made available to ALECs, would significantly reduce the number and frequency of the OSS-related problems that cause IDS's and other ALECs' inability to provide adequate service to their customers and their inability to effectively compete for local telephone service business.

BellSouth is required to provide IDS and all ALECs parity and non-discriminatory access to what BellSouth uses for its own customer orders. BellSouth's witnesses testify that BellSouth is in compliance with these

requirements simply because BellSouth does make available systems that enable a customer to switch from BellSouth to IDS or from IDS resale to UNE-P. In addition, BellSouth has withheld information, such as the complete BellSouth Customer Service Record ("CSR") file layout, without which the ALECs and vendors cannot create their own comparable front-end systems with the same features and functions as BellSouth's ordering systems. However, the concepts of parity and non-discrimination must take into account the *quality* of the systems that BellSouth makes available to IDS and other ALECs, compared to what BellSouth uses for its own retail orders. As my and Ms. Wellman's testimony shows, the quality of the OSS that BellSouth uses for ALEC orders is inferior to what it uses for its own retail orders and what it has available, but simply will not share with IDS or other ALECs.

Q. HOW WOULD YOU CHARACTERIZE BELLSOUTH'S TESTIMONY REGARDING WHETHER IT PROVIDES OSS AND UNE-P AT PARITY?

A. BellSouth's testimony on this subject is, for the most part, non-responsive, evasive and misleading. I have read BellSouth's testimony closely, and BellSouth's witnesses do not deny that BellSouth has available or could implement better systems than what it allows IDS and other ALECs to use. They simply make excuses, none of which is adequate to justify BellSouth's withholding of these better OSS systems.

Q. MS. WELLMAN, WOULD YOU PLEASE ELABORATE AND IDENTIFY THE PARTICULAR OSS ITEMS THAT MR. GULAS IS REFERRING TO WHEN HE SAYS THAT BELLSOUTH HAS AVAILABLE OR COULD IMPLEMENT BETTER OSS BUT CHOOSES NOT TO?

A Yes. I will focus in this panel testimony on two issues, each of which factors into a different stage in the processing of an ALEC's customer request to convert service.

BellSouth has available, and itself uses, ordering systems that automatically correct certain errors in customer service requests. Specifically, these are the "DOE" and "SONGS" systems. However, BellSouth refuses to give IDS direct access to these systems, which would reduce the number of steps in the ordering process and reduce the risk of orders that have to be reprocessed.

BellSouth also has the ability to change the ordering process that triggers a conversion to UNE-P service from its current two-step process, called "D&N", to a single-step process, called the single "C." This change would virtually eliminate the risk of a customer's loss of service between the disconnection of BellSouth service and the connection of IDS service.

However, BellSouth made a business decision not to implement such a system.

Additionally, BellSouth has kept hidden until very recently a superior method of ordering the conversion of BellSouth retail and ALEC resale accounts to UNE-P accounts, called "Activity Type W." I and Keith Kramer discuss the "W" issue in separate rebuttal panel testimony.

I. REBUTTAL OF BELLSOUTH TESTIMONY REGARDING "DOE" AND "SONGS'

Q: MS. WELLMAN, YOU RECOMMENDED IN YOUR DIRECT TESTIMONY THAT THE FLORIDA PSC ORDER BELLSOUTH TO PROVIDE IDS WITH DIRECT ACCESS TO "DOE" AND "SONGS." HAVE YOU PERSONALLY WORKED DIRECTLY WITH THE DOE AND/OR SONGS SYSTEMS?

A: Yes, I worked directly with DOE during my eleven-year tenure as a customer service representative for BellSouth retail. As a BellSouth customer service representative, I manually entered service requests using DOE for several years. Although I no longer work for BellSouth, my knowledge regarding BellSouth's operations is current in all pertinent respects, despite BellSouth witnesses' assertions to the contrary.

Q: PLEASE EXPLAIN THE DOE AND SONGS SYSTEMS.

A: Essentially, DOE and SONGS are front-end editing and order input systems used by BellSouth's Local Carrier Service Centers ("LCSC") to manually input the ALECs' local service requests that cannot be processed electronically by BellSouth's system. DOE and SONGS enable the LCSC service representative to eliminate thousands of errors in a service request at the data entry stage. As I stated in my direct testimony, DOE and SONGS provide automatic prompts if certain information is missing or invalid, and they also format certain information properly if entered incorrectly. For example, if a service request for "Call Forward Don't Answer" is being entered into DOE or SONGS, and the individual entering the data fails to identify the number of rings before the call is to be forwarded, DOE or SONGS will automatically input four rings.

Because the ALECs do not have direct access to DOE and SONGS, when an ALEC submits a local service request with invalid or missing data, the BellSouth system will either electronically reject the local service request back to the ALEC for clarification or the local service request will "fall out" of electronic processing to the LCSC for manual handling through DOE and SONGS. This fallout can delay the generation of an ALEC's order for hours or even days. Thus, if IDS and the other ALECs had direct access to DOE and SONGS, the ALECs could eliminate thousands of errors before the service request information even hits BellSouth's system.

Q: WHAT CAUSES ERRORS ON A LOCAL SERVICE REQUEST?

A: Invalid or missing data on a local service request can be the result of problems with the way the ALEC enters the data or problems on BellSouth's end. As I indicated in my direct testimony, the ALEC must follow the specific and extensive BellSouth Business Rules for Local Ordering ("BBRLO"), which are available for review on-line or on paper. However, the formatting required by the business rules is not currently prompted as edits when the ALEC enters data into the local service ordering interface. Other problems include invalid formatting embedded in BellSouth customer service records and obsolete Universal Service Order Codes ("USOC"). Thus, when Ms. Harris, on page 4, lines 17-25 of her rebuttal attributes fall out to "missing, incorrect or incomplete information" on a local service request, she fails to disclose that the missing, incorrect or incomplete information is in part caused by missing or invalid information on BellSouth's own customer service records.

Q: PLEASE EXPLAIN HOW DOE AND SONGS FIT INTO BELLSOUTH'S ORDER PROCESSING SYSTEM.

A: When an ALEC, such as IDS, submits a local service request electronically to BellSouth, the local service request is first run through an editing system called Local Exchange Ordering ("LEO"). LEO will look for basic information that each order must have, such as a purchase order number and a telephone number. If any required information is missing or incorrect, LEO will send the service request back

to the ALEC for clarification. If the local service request is correct from the perspective of LEO, the local service request will then be sent to the Local Exchange Service Order Generator ("LESOG") system. If LESOG does not catch any errors, then LESOG will generate an order into BellSouth's Service Order Communications Systems ("SOCS") and a Firm Order Commitment ("FOC") will be sent to the ALEC with a due date assigned to the order. However, if a problem remains embedded in the BellSouth customer service record or if the service request cannot be processed electronically, the service request will fall out from the electronic processing and then will be sent to BellSouth's LCSC for manual handling. The BellSouth service representative manually keys the service request information into DOE or SONGS. If the BellSouth LCSC service representative can process the service request without clarification from the ALEC, the service representative will issue an FOC to the ALEC and will generate an order into SOCS using DOE or SONGS. The service representative has ten (10) business hours to issue a FOC or to return the service request to the ALEC for clarification from the time the service request first hits BellSouth's systems. From SOCS the order will flow through BellSouth's downstream systems for completion of the order, including the issuance of a final bill and a new customer service record.

Q: WHAT HAPPENS IF THE BELLSOUTH LCSC SERVICE REPRESENTATIVE SENDS THE LOCAL SERVICE REQUEST BACK TO THE ALEC FOR CLARIFICATION?

A: If the BellSouth service representative sends the local service request back to the ALEC for clarification, the generation of the order will be delayed. The BellSouth service representative has up to ten business hours from the time the local service request first enters BellSouth's system to send the local service request back to the ALEC for clarification. In addition, the FOC or clarification deadline starts ticking anew each time a clarified local service request is resubmitted to BellSouth. Accordingly, once the local service request is resubmitted, the BellSouth service representative has an additional ten business hours to issue an FOC or a clarification. If the BellSouth representatives does not identify every error for clarification on the first go around (and the representatives often fail to identify all errors for clarification on the first try), the generation of an order can be delayed for days.

Q: ON PAGE 21, LINES 6 - 7, OF HIS DIRECT TESTIMONY, MR. JERRY WILSON STATES THAT DOE AND SONGS ARE USED PRIMARILY BY BELLSOUTH LCSC SERVICE REPRESENTATIVES TO ENTER ALEC ORDERS THAT WERE SUBMITTED MANUALLY BY THE ALEC. IS THAT AN ACCURATE STATEMENT?

A: No. IDS submits more than 90% of its local service requests electronically to BellSouth. However, for reasons already discussed earlier in this testimony, many simple local service requests do not electronically flow through to SOCS. Thus, as I stated earlier, when a local service request falls out to LCSC, the BellSouth service

representative manually processes the local service request through DOE or SONGS.

Q: WHAT TYPE OF SIMPLE LOCAL SERVICE REQUESTS TEND TO "FALL OUT?"

A: Many local service requests fall out if the following simple activities are requested:

- Accounts with more than twenty-five lines;
- Related Purchase Order Number;
- Denial/Restoral orders with conversion and disconnect (which means deny service until a bill is paid, restore service after a bill is paid, or disconnect if the bill is not paid);
- Transfer orders (which means transferring service for a customer moving to a new location); and
- Multi-line hunting orders (which means enabling incoming calls to search for an available line on accounts with sixteen or more lines or with complex services).

BellSouth refers to these local service requests as "designed fallouts," meaning that local service requests of this type are designed to fall out to BellSouth's LCSC for manual handling because BellSouth's electronic systems cannot process them.

Q: ON PAGE 20, LINES 13-15 OF HIS REBUTTAL TESTIMONY, MR. WILSON STATES THAT "THE SAME TYPES OF REQUESTS FLOW THROUGH, OR FALL OUT FOR MANUAL HANDLING, FOR BOTH ALECS AND BELLSOUTH RETAIL." IS THAT STATEMENT ACCURATE?

A: No, on page 19 of his rebuttal testimony, Mr. Wilson presents a chart of products and services which, when submitted by the ALECs to BellSouth as a service request, will fall out for manual handling. These same service requests, when processed by BellSouth retail for its own customers, will flow through electronically. In addition, on page 20, lines 6-8 of his rebuttal testimony, Mr. Wilson states that the types of local service requests that fall out for manual handling on ALEC requests, such as requests for complex services, also impact BellSouth's retail flow through. However, Mr. Wilson neglects to disclose that many requests by ALECs for simple services fall out as well, including those about which I just testified. The only BellSouth simple service request that Mr. Wilson identifies as being prone to fall out is a BellSouth retail service request for more than 25 lines (page 19, line 13-15 of Mr. Wilson's rebuttal testimony). BellSouth is clearly not providing OSS at parity, as demonstrated by the disparity in the number and types of ALEC service requests that fall out, as compared to the BellSouth's service requests that fall out.

Q: WHAT IMPROVEMENT IN ORDER PROCESSING WOULD IDS EXPERIENCE IF IT WERE GIVEN DIRECT ACCESS TO DOE AND SONGS?

A: A local service request that is returned by LEO/LESOG for clarification is typically returned to IDS within twenty to thirty minutes after IDS's submission. As I discussed earlier, a local service request that drops out to BellSouth's LCSC for manual handling can take hours longer or even days longer. If IDS had direct access to DOE and SONGS, IDS would have the capability of entering orders directly into SOCS without manual or electronic intervention by BellSouth. This would eliminate the risk of a ten business hour (or more) delay in having BellSouth generate the order.

Additionally, IDS would also be able to issue real time appointments for the completion of the service orders when necessary. Without DOE and SONGS, IDS must rely on time frames published by BellSouth on the worldwide web for the completion of the orders, instead of being able to set deadlines for the completion of the orders based on BellSouth's actual workload. BellSouth does not use these published due dates for its own end users' orders.

Q: PLEASE EXPLAIN WHY BELLSOUTH'S FAILURE TO GIVE IDS AND OTHER ALECS DIRECT ACCESS TO DOE AND SONGS MEANS THAT BELLSOUTH IS NOT PROVIDING NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OSS.

A: As I discussed earlier, direct access to DOE and SONGS would allow IDS to input its orders directly into SOCS without manual or electronic intervention by

BellSouth. IDS could shorten by several hours, and even days, the time it takes to generate orders from manually handled local service requests. Direct access to DOE and SONGS would allow IDS to generate orders with a comparable speed and efficiency with which BellSouth retail generates orders for its end users.

Q: MR. GULAS, ON PAGE 25, LINES 1-19 OF HIS DIRECT TESTIMONY, MR. WILSON LISTS SIX REASONS WHY BELLSOUTH SHOULD NOT BE REQUIRED TO GIVE IDS AND OTHER ALECS DIRECT ACCESS TO DOE AND SONGS. PLEASE COMMENT ON MR. WILSON'S REASONS.

A Mr. Wilson's reasons for not giving ALECs direct access to DOE and SONGS are deficient at best. First, on page 25, lines 1-2 of his direct testimony, Mr. Wilson claims that "DOE and SONGS are older systems that, over time, are being replaced (by ROS and RNS, for example)." Mr. Wilson also states on page 21, lines 13 –15 of his direct testimony that "RNS and ROS are not designed to support BellSouth's Resale or UNE offering . . . ." Mr. Wilson's own testimony demonstrates that BellSouth is not providing nondiscriminatory access to BellSouth's system, as the LCSC is using older and less effective systems to manually enter the ALECs' service requests while BellSouth's newer and more powerful retail systems were developed to exclude resale or UNE-P ordering. Also, if Mr. Wilson's concern is that BellSouth will be replacing these older systems, then BellSouth can give the ALECs access to DOE and SONGS now and upgrade the ALECs to the newer system when BellSouth upgrades the LCSC.

Mr. Wilson's second reason for not giving IDS direct access to DOE and SONGS is that "[t]here are capacity limitations and our ability to expand DOE is increasing limited by unavailability of necessary equipment" (page 25, lines 4-5 of Mr. Wilson's direct testimony). However, the number of orders will be the same whether the local service requests are processed by the LCSC or whether the ALECs enter the requests directly through DOE and SONGS to generate an order. Moreover, if BellSouth in fact does not have the "necessary equipment," the ALECS could limit their use of DOE and SONGS for the local service requests designed to fallout to the LCSC.

Third, Mr. Wilson states that "DOE and SONGS do not have the needed security elements to protect customer information should direct access be allowed to all ALECs" (page 25, lines 7-8 of Mr. Wilson's direct testimony). BellSouth has already designed software in its LENS, TAG and EDI ordering systems to prevent ALECs from reviewing other ALECs orders. In addition, BellSouth has shown that it has already overcome the security risks posed by the ALECs sharing the same systems as BellSouth retail because the ALECs and BellSouth retail are both using Trouble Analysis and Facilities Interface ("TAFI") for maintenance and trouble tickets.

Fourth, Mr. Wilson asserts that "[m]ethods and procedures are only developed for the BellSouth service representative and would require development and/or modification for ALECs in a direct access environment" (pages 25, lines 10-12 of Mr. Wilson's direct testimony). Mr. Wilson is merely stating that the ALECs would need training, and this concern has already been solved by BellSouth's LCSC. Ms. Miller-Fields describes in detail on pages 2 through 6 of her direct testimony the training the LCSC service representatives receive before they are allowed to enter ALEC orders. The ALECs would simply need the same training, slightly modified, if given access to DOE and SONGS.

Fifth, Mr. Wilson asserts that "[w]hile the nondiscriminatory interface for ALECs are based on national standards, DOE/SONGS are not Ordering and Billing Forum compliant" (page 25, lines 14-15 of Mr. Wilson's direct testimony). However, the Ordering and Billing Forum ("OBF") "standards" are not mandatory. OBF members have the right not to adopt OBF recommendations and BellSouth itself is not OBF compliant in some of its fields and forms.

Sixth, Mr. Wilson states that IDS already has nondiscriminatory access to BellSouth's systems. Mr. Wilson also asserts on page 22, lines 14 through 16 of his direct testimony, that "IDS chooses to primarily use LENS electronic interface, which does not offer the integration capabilities of TAG, RoboTAG™, or EDI." Mr. Wilson is comparing apples to oranges. EDI, RoboTAG and EDI are simply gateways that allow the ALECs to send

service requests to BellSouth. Giving the ALECs a means to send information is not the same as giving the ALECs a means to process orders with comparable speed and efficiency as BellSouth retail. In addition, Mr. Wilson fails to tell the Commission that BellSouth prevents IDS and other ALECs to create true, robust front-end programs compatible with BellSouth's retail systems because BellSouth will not provide the ALECs with the full record layout of BellSouth's customer service records. If ALECs were allowed this information, they could develop systems that would mirror BellSouth's retail ROS and RNS systems or even the inferior systems of DOE and SONGS.

II. REBUTTAL OF BELLSOUTH TESTIMONY REGARDING "D&N" AND "C'

Q. MS. WELLMAN, PLEASE EXPLAIN THE "D&N" PROCESS YOU REFERRED TO EARLIER IN YOUR TESTIMONY.

A. "D&N" is an order process implemented internally by BellSouth, after it receives a completed IDS local service request, to activate the conversion of a customer from BellSouth or IDS resale to IDS UNE-P. In order to trigger the actual conversion process, BellSouth generates a "D" service order to disconnect the end user, and then issues an "N" order to install new service for the end user. It is a two-step process. In the past, "D&N" also was used to activate the conversion of a customer from BellSouth retail to an ALEC's

resale. For those conversions, however, the "D&N" process has been replaced by the "C" process.

Q. WHAT IS THE "C" PROCESS?

A. "C" is also a type of order generated internally by BellSouth, after receiving a completed local service requests from IDS, to convert a customer from BellSouth retail to IDS resale. It was implemented by BellSouth sometime in 1997 or 1998 to replace the"D&N" process for the retail to resale conversions. The significant difference between the "C" and "D&N" processes is that the "C" is a single-order process, and the "D&N" is a two-order process.

Q. WHY IS IT SIGNIFICANT THAT "C" IS A ONE-ORDER PROCESS AND "D&N" IS A TWO-ORDER PROCESS?

A. Let me give you some of the history of the two processes, and that will help to explain the importance of the distinction. Until sometime in 1997 or 1998, for a conversion request from BellSouth retail to an ALEC's resale, the "D&N" process was used to complete the conversion. However, BellSouth discovered that the two-order "D&N" process was causing service outages to customers during these conversions. For this reason, a single-order "C" process was developed for resale conversions in 1997 or 1998. The change to a single-order process, or what is often referred to as a "single C," greatly

reduced the possibility of service disruptions during conversions because only one order is generated to effectuate these conversions, as opposed to two orders that have to be kept together as they flow through BellSouth's systems. Additionally, BellSouth retail has for years used the single "C" process for changing its basic service customers from flat rate to measured service, which is similar to a UNE-P conversion.

As you can see, the significance is that the two-order "D&N" process introduces a greater risk of service interruption because, in order to prevent customers from experiencing service outages, the two orders have to be generated and then kept together as they travel through BellSouth's systems. The single "C" does not present this problem because it involves only one order. Service outages created by the "D&N" process inconvenience IDS's new customers, and they can even prompt customers to cancel IDS service before it is even completely converted.

Q. HAS BELLSOUTH EVER CONSIDERED USING THE SINGLE "C" PROCESS FOR CONVERSIONS FROM BELLSOUTH RETAIL OR AN ALEC'S RESALE TO THE ALEC'S UNE-P?

A. Yes. Beginning in 1997, when development began for the port-loop combination and in 1998 during the development of the Network Combinations (which combined the port, loop and transport UNEs, as well

as a professional services fee), the same "D&N" process used for resale conversions was also used for these types of conversions. In March 1999, BellSouth asked the Network Combinations team that I was working on to develop a single "C" process for UNE-P because of the same concerns that surrounded the process during the resale conversions. Jean Smith, the project manager for the single "C" product that was developed to replace the "D&N" for resale conversions was brought onto the Network Combinations product team to help in the development of a ingle "C" for conversions to Network Combinations service. After just one meeting, however, BellSouth made a decision to delay that development based on its priorities and resources. As of today, that process is still not developed for use in the UNE-P conversions, although I understand it is in development for release in 2002.

Q. CONSIDERING THAT BELLSOUTH SUCCESSFULLY DEVELOPED A SINGLE "C" PROCESS FOR RESALE CONVERSIONS, IF YOUR TEAM HAD BEEN PERMITTED TO GO FORWARD, COULD IT HAVE DEVELOPED A SINGLE "C" FOR THE NETWORK COMBINATIONS PRODUCT THAT WOULD THEN BE AVAILABLE FOR THE UNE-P CONVERSIONS PRODUCT?

A. BellSouth could have developed a single "C" process for Network Combinations conversions. There was nothing about the technology or

complexity that would have made it impossible to do that. Nevertheless, BellSouth decided for business reasons to put the development of the improved conversion process on hold.

Q. HOW WOULD A SINGLE-STEP "C" PROCESS IMPROVE IDS'S UNE-P CONVERSIONS, COMPARED WITH THE "D&N" PROCESS THAT IS CURRENTLY USED?

A. When the "D" and "N" orders are issued to convert a customer to IDS's UNE-P service, the customer's service can be negatively affected because of the separation of the two orders. For example, if BellSouth's LCSC omits certain required data on a service order, the "D" and "N" orders can get separated and then processed individually, which in turn can cause a customer to lose dial tone.

As recently as July 2001, the orders could have been issued incorrectly, causing the orders to be separated farther downstream. It was not until July 21, 2001, after the IDS complaint was filed, that BellSouth finally put in place an internal edit to attempt to prevent the "D" and the "N" orders from separating.

The use of the single "C" process would virtually eliminate the risk inherent with the "D&N" process.

Q. MR. GULAS, BELLSOUTH WITNESS SANDRA HARRIS TESTIFIES THAT THE SINGLE "C" PROCESS IS NOT APPROPRIATE FOR USE IN CONNECTION WITH UNE-P CONVERSIONS. DO YOU HAVE ANY RESPONSE TO THAT TESTIMONY?

A. Yes. Ms. Sandra Harris' testimony leads the reader to believe that converting a customer from BellSouth retail or IDS's resale to IDS's UNE-P service is a complex process, and as such requires the two-order "D&N" process because the "C" is not appropriate for a complex conversion. In her testimony, at page 10, lines 21-25, and page 11, lines 1-6, Ms. Harris uses as an example of a complex conversion a switch of a basic local exchange customer to BellSouth's Centrex Service, which is like a virtual PBX service provided by BellSouth. While I would agree with Ms. Harris that switching a basic local exchange customer to Centrex is a complex process, it is not a realistic example of what happens when converting a BellSouth retail or IDS resale customer to IDS's UNE-P service. The conversion of a BellSouth retail or IDS resale customer to UNE-P is nowhere as difficult as the complex move of a customer from basic service to Centrex.

Q. WHAT WOULD BE A FAIR COMPARISON?

A The conversion of a BellSouth retail or IDS resale customer to UNE-P is more comparable to converting a BellSouth retail customer from flat rate service to measured rate service.

Q. WHICH TYPE OF PROCESS IS USED IN THAT SITUATION - - A "D&N" OR A "C"?

A. When a BellSouth retail flat rate customer contacts BellSouth and wants to change to BellSouth retail measured rate service, the service representative enters a single "C" order. This order changes the class of service the customer had from flat rate to measured rate and notifies the switch to start recording calls so that BellSouth can bill measured rates to the customer.

Q. BUT, MS. HARRIS TESTIFIES ON PAGE 9, LINES 16-25, AND PAGE 10, LINES 1-15, THAT THERE ARE SEVERAL REASONS WHY THE SINGLE "C" PROCESS CANNOT BE USED FOR CONVERSIONS FROM RESALE TO UNE-P. HOW DO YOU RESPOND?

A. I will address each of Ms. Harris's reasons, one at a time. Ms. Harris' first explanation of why the "C" cannot be used for resale to UNE-P conversions is that resale is a flat rate and UNE services are measured. While this is correct, Ms. Harris fails to tell the Commission that BellSouth already switches its own flat rate to measured rate customers using the single "C", as I have already testified. Ms. Harris' second reason is that line class codes would have to be changed to allow for the billing of measured elements. She neglects, however, to acknowledge that BellSouth already does this when it moves its own retail customers from flat rate service to retail measured rate service. For her third reason, Ms. Harris asserts that daily usage files would

have to be created. However, she again neglects to advise the Commission that BellSouth already does this when its own retail customers move from BellSouth flat rate to BellSouth retail measured services. For her fourth reason, Ms. Harris states that a final bill would have to be issued because billing rates are different between UNE-P and resale. Much like before, Ms. Harris withholds the fact that when BellSouth customers move from BellSouth retail to ALECs' resale services, BellSouth issues final bills to the customers and then billing to the ALECs begins. Furthermore, "D&N" orders are not required to make this happen. Provisions have been made within BellSouth systems to create these final bills, and the same types of systems could be used to create final bills when customers switch to UNE-P service.

Q. MS. HARRIS ALSO SUGGESTS, ON PAGE 8, LINES 1-11 OF HER DIRECT TESTIMONY, THAT BELLSOUTH HAS SUCCESSFULLY CONVERTED ALECS' ENTIRE CUSTOMER BASES FROM RESALE TO UNE-P USING THE "D&N" PROCESS, AND THAT YOU EVEN HOSTED A CELEBRATION OF THOSE SUCCESSFUL CONVERSIONS WHILE EMPLOYED AT BELLSOUTH. HOW DO YOU RESPOND?

A. While it is true that a conversion did take place and that BellSouth celebrated its success, it is completely inappropriate and misleading for Ms. Harris to use that conversion as an example of the effectiveness of the "D&N"

process. During that conversion, BellSouth did not utilize the same front-end ordering systems that ALECs use to place requests with BellSouth, and thereby avoided most of the OSS problems that plague ALECs. During that particular conversion, BellSouth bypassed all of the front-end OSS systems. Those particular conversion orders were electronically created by BellSouth using MECHSO (Mechanized Service Order), a BellSouth-created system that writes service orders en masse, and fed into the BellSouth network systems directly. Additionally, BellSouth employees babysat that entire conversion process.

IDS and the other ALECs do not have access to MECHSO and therefore cannot bypass the front-end OSS systems that create most of the OSS problems. Nor do IDS and the other ALECs have the resources to babysit each and every request they process through BellSouth.

Additionally, Ms. Harris fails to tell the Commission that the reason BellSouth performed those conversions for ALECs Access One and Access Integrated is because those ALECs had been unsuccessful in their own attempts to get their orders through BellSouth's EDI.

Q. MR. GULAS, YOU ALSO WERE ON THE BELLSOUTH NETWORK COMBINATIONS TEAM THAT WAS ASKED TO DEVELOP A SINGLE

"C" PROCESS FOR UNE-P. DO YOU CONCUR WITH YOUR COLLEAGUE MS. WELLMAN'S TESTIMONY ABOUT THE WEAKNESS OF THE "D&N" PROCESS AND BELLSOUTH'S DECISION NOT TO PURSUE DEVELOPING A BETTER, SINGLE-STEP "C" FOR UNE-P?

A. Ms. Wellman's testimony is correct. Prior to the FCC's Third Report and Order and Fourth Notice of Proposed Rulemaking (FCC-99-238), which basically gave birth to the UNE-P, BellSouth had not planned on offering UNE combinations at UNE rates. Therefore, when the FCC Order was issued and became effective on Feb. 17, 2000, BellSouth was required to quickly implement a way to pre-order, order, provision, maintain, and bill UNE combinations.

Prior to this, BellSouth had developed and rolled out the Network Combinations product, which also utilized the disconnect "D" and new "N" connect process. I and Ms. Wellman were on the Network Combination team. During the development of that process, specifically in May 1998, our team expressed concerns about the "D&N" process to BellSouth upper management. In our Steering Committee meetings with Marketing and Operations Vice Presidents and Assistant Vice Presidents in July and August of 1998, it was recognized that something needed to be done about the problematic "D&N" process. In fact, one of my action items from these

meetings was to write a work request for the development of a single "C" process.

As Ms. Wellman testified, our first and only meeting to discuss the development of a single "C" process was in March 1999. I believe that BellSouth realized from that meeting that the development of a single "C" was not going to be a quick fix, and it made the decision to shelve the project based on priorities and resource commitments. BellSouth has had the ability ever since then to develop a single "C" process for conversions of customers to ALECs' UNE-P service. BellSouth simply has chosen not to do so.

III. REBUTTAL OF BELLSOUTH TESTIMONY REGARDING THE "BULK ORDERING INCIDENT" AND CLARIFICATIONS TO MS. WELLMAN'S DIRECT TESTIMONY

Q. MR. GULAS, CONCERNING A DIFFERENT ISSUE, BELLSOUTH'S WITNESSES CLAIM THE "BULK ORDERING INCIDENT" WAS MERELY THE RESULT OF AN INTERNAL MISCOMMUNICATION. DO YOU HAVE ANY INSIGHT ON THIS ISSUE?

A. Yes. Based on my years of experience working at BellSouth, I cannot imagine that, with all of the checkpoints in BellSouth's internal operations, the bulk ordering functionality could have been released inadvertently. From

the time when software, such as the bulk ordering process, is conceived through the time it is actually implemented, it passes through many checkpoints in order for BellSouth to be certain that a product is not released prematurely. As shown in Exhibit "WG/BW-1" attached to this testimony, the process of writing the business rules, writing the system requirements, coding, testing and final release is an extensive one. Also, after significant testing by both BellSouth's IT group, the User Acceptance Testing group, the Release Manager, the Release Manager's Supervisor, the Test Manager, the LCSC Subject Matter Expert and the System Project Manager participate in a conference call during which they decide whether or not to implement the release.

Additionally, if a Carrier Notification Letter regarding the new software has to be released to the ALEC community, this letter must be written and requires approval from BellSouth's Marketing, Sales, Operations and IT departments. Depending on the type of Carrier Notification letter, this involves from 25 to 35 people, any one of whom can make changes to the letter or stop it from being released. BellSouth indeed released two such Carrier Notification letters regarding the bulk ordering, one dated March 16, 2000 and superseded on April 6, 2000 and another dated April 6. (Copies of those Carrier Notification letters are attached to this testimony as Composite Exhibit "WG/BW-2". Because the March 16, 2000, Carrier

Notification letter was superseded by one of the April 6, 2000 letters, the earlier one is unavailable to IDS.)

In addition, BellSouth sent Agendas and Notices of Presentations to the ALECs beginning in March 2000, notifying the ALECs of the Inforum scheduled for May 2-3, 2000 and the topics that would be covered, including OSS systems enhancements, updates and products. (IDS has asked in discovery for a copy of that agenda, but has not yet received it.)

Certainly, considering all of the steps and all of the BellSouth personnel involved in the release of software such as the bulk ordering process, it appears inconceivable that BellSouth's release of that software was merely the result of miscommunication.

Q: MS. WELLMAN, IN REVIEWING YOUR DIRECT TESTIMONY THAT WAS FILED ON JULY 23, 2001, IS THERE ANYTHING THAT NEEDS TO BE CLARIFIED?

A: Yes, in responding to the question on page 8 regarding how BellSouth internal systems processes its orders for BellSouth's retail customers, the following clarifications to my direct testimony should be made. I understand that BellSouth retail has replaced DOE and SONGS with newer and more powerful front-end editing and order input systems called ROS and RNS. While employed at BellSouth, I knew that BellSouth was developing ROS and RNS. However, because my positions with BellSouth changed over the years, I was unaware that BellSouth

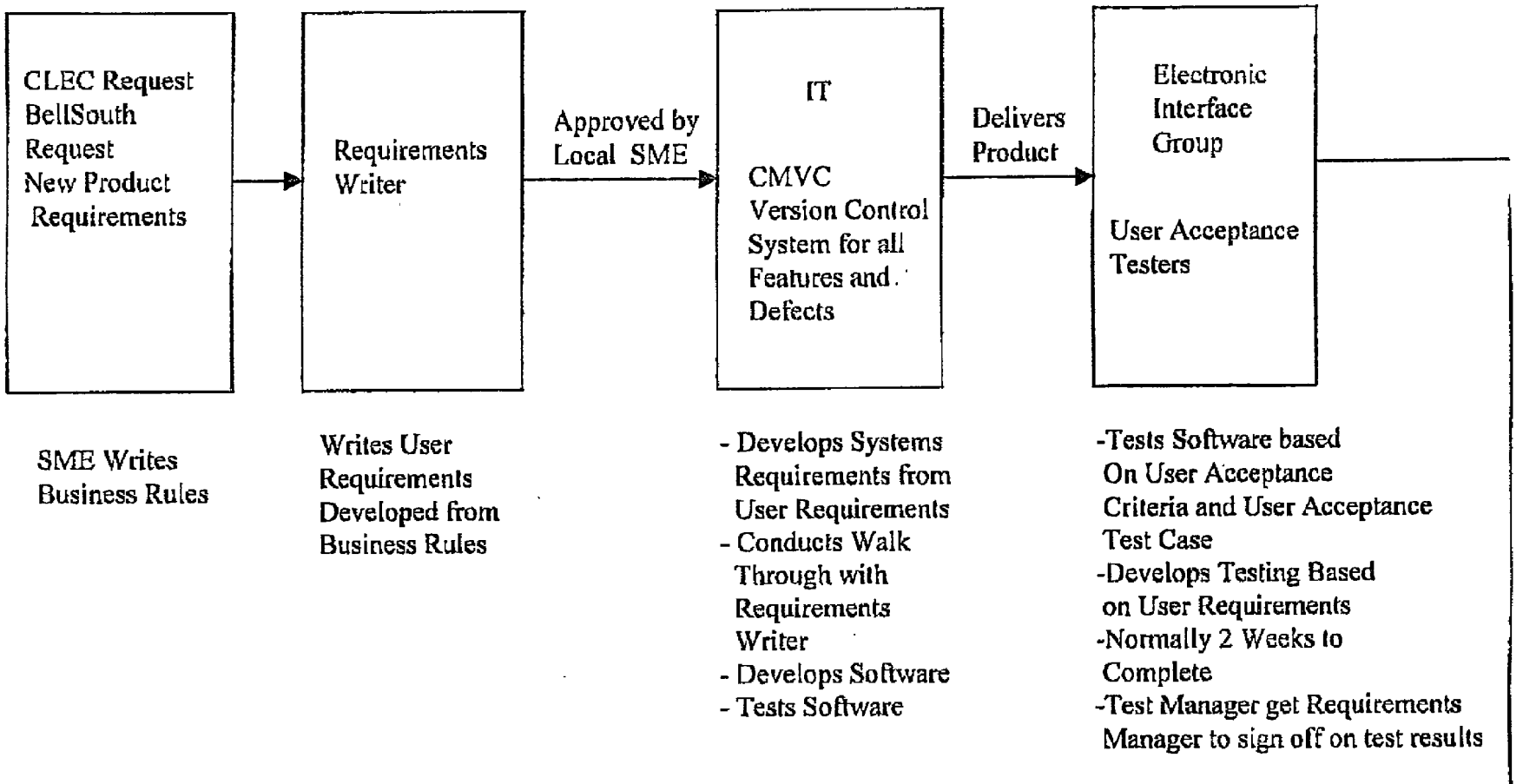
had deployed ROS and RNS. Notwithstanding, BellSouth's LCSC still uses DOE and SONGS to manually key in local service requests that cannot be electronically processed. In addition, in my answer on page 9 of my direct testimony, I stated that a BellSouth service representative will input an order directly into DOE or SONGS while the BellSouth customer is on line. Here, I was referring to residence and small business service requests, which the BellSouth service representatives do input into ROS and RNS while the customer is on line.

In responding to the question on page 9 regarding BellSouth's LCSC, I stated that the LCSC service representatives have eighteen business hours to generate an order, to return an FOC to the ALEC, or to send the local service request back to the ALEC for clarification. I understand this time frame was changed. It is my understanding that the LCSC service representatives now have ten business hours in which to generate an order, issue a FOC, or return the local service request with a clarification to the ALEC from the time the local service request entered BellSouth's system.

Q. MR. GULAS AND MS. WELLMAN, DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

SOFTWARE RELEASE PROCESS



Docket No. 010740-TP
Exhibit ____ (WG/BW-1)
Page 1 of 1

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91081703

Date: April 6, 2000

To: Competitive Local Exchange Carriers (CLECs)

Subject: **REVISED:** CLEC – Electronic Interface System Downtime – Release 6.2 (originally dated March 16, 2000)

Release 6.2 of the electronic interfaces will be implemented on April 15, 2000. Please be advised that the Electronic Data Interchange (EDI), Local Exchange Navigator System (LENS) and Telecommunications Access Gateway (TAG) will be unavailable to process orders from 12:01 AM EDT on Saturday, April 15, 2000, until 7:00 PM EDT on Sunday, April 16, 2000.

The scope of this release is outlined below.

LENS (Issue 9):
- Yellow Page Heading codes will change to support the BellSouth Advertising and Publishing Corporation (BAPCO) changes, moving from 7 alphanumeric to 6 numeric characters. This change is effective in the States of Georgia, Alabama, Florida, Mississippi, Louisiana and Tennessee.
- Allow supplemental Local Service Requests (LSRs) on restoral requests.
- Change the End User Room and End User Building fields from 9 alphanumeric to 15 alphanumeric characters.
- Addition of Preferred Interexchange Carrier (PIC) and Local Service Provider Identification (LPIC) valid values.
- Support of multiple telephone numbers on change orders.
- Implement inside wiring jack fields IWJK, IWJQ, IWO
- Support ordering of SL1, SL2 and Digital Unbundled Network Element (UNE) Loops.
- Support ordering of Port/Loop Combinations for users with Port/Loop combination contracts, including Residential, Business and PBX services.
- Support Bulk Ordering capabilities for Port/Loop Combinations for users with Port/Loop combination contracts utilizing ACT TYPE W.
- Calculate the estimated due date in the inquiry process in the same manner as it is calculated in TAG.

The LENS User Guide will be updated to reflect the enhancements as well as clarifications and minor changes.

EDI:
- Yellow Page Heading codes will change to support the BAPCO changes, moving from 7 alphanumeric to 6 numeric characters. This change is effective in the States of Georgia, Alabama, Florida, Mississippi, Louisiana and Tennessee. This change also applies for Issues 7 and 9.

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91081725

Date: April 6, 2000

To: Competitive Local Exchange Carriers (CLECs)

Subject: **Revision to SN91081703** - CLEC – Electronic Interface System Downtime – Release 6.2.

Carrier Notification Letter SN91081703, originally released on March 16, 2000, has been revised to change the times Electronic Data Interchange (EDI), Local Exchange Navigator System (LENS) and Telecommunications Access Gateway (TAG) will be unavailable and the due date calculation for LENS was added. Please review the revised letter for details.

Sincerely,

ORIGINAL SIGNED BY JIM BRINKLEY

Jim Brinkley – Senior Director
Interconnection Services