MCWHIRTER REEVES

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

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TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-2506 FAX

October 3, 2001

VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re: Docket No.: 960786-A-TL

Dear Ms. Bayo:

On behalf of ACCESS Integrated Networks, Inc., enclosed for filing and distribution are the original and 15 copies of ACCESS Integrated Networks, Inc.'s Revised Rebuttal Testimony of Rodney Page.

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

Jae Mi Slothlim-

JAM/mls Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996.

Docket No. 960786-A-TL

REVISED REBUTTAL TESTIMONY

OF

RODNEY PAGE

ON BEHALF OF

ACCESS INTEGRATED NETWORKS, INC.

JULY 20, 2001

- 1 O. Please state your name and business address.
- A. My name is Rodney Page. My business address is 4885 Riverside Drive, Suite 101, Macon, Georgia 31210.
- 4 Q. What position do you hold with ACCESS?
- 5 A. I am Vice President for Marketing and Strategic Development.
- 6 Q. What is the purpose of your testimony?
- 7 The thrust of the testimony of BellSouth witness Cynthia Cox is that all is A. 8 healthy and well with respect to the development of competition in Florida. In 9 my testimony I will show that, to the contrary, the development of competition 10 is being hampered by overt conduct on the part of BellSouth. I will recount some 11 of ACCESS' negative experiences with BellSouth that I believe should bear on 12 the Commission's evaluation of whether BellSouth has shown the degree of 13 compliance with its obligations under the 1996 Telecommunications Act that is 14 a condition precedent to its entry into the interLATA toll market.
 - Q. Which issues will you address?

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- A. My testimony pertains to Issue 2, which addresses whether BellSouth has
 provided interconnection and access in the manner required by the Act; and Issue
 3, which addresses whether BellSouth is providing unbundled network elements
 on terms that are just, reasonable, and non-discriminatory.
 - Q. Please describe ACCESS Integrated Networks, Inc.
- A. ACCESS is a small but growing ALEC that provides alternative local exchange service in the nine states in which BellSouth is the ILEC. ACCESS' headquarters are in Macon, Georgia. ACCESS currently has 57,000 access lines.

of which some 3,000 are in Florida. ACCESS serves small to medium sized business customers. Our business plan includes service to smaller communities in which business customers typically do not have as many alternatives as those located in larger metropolitan areas.

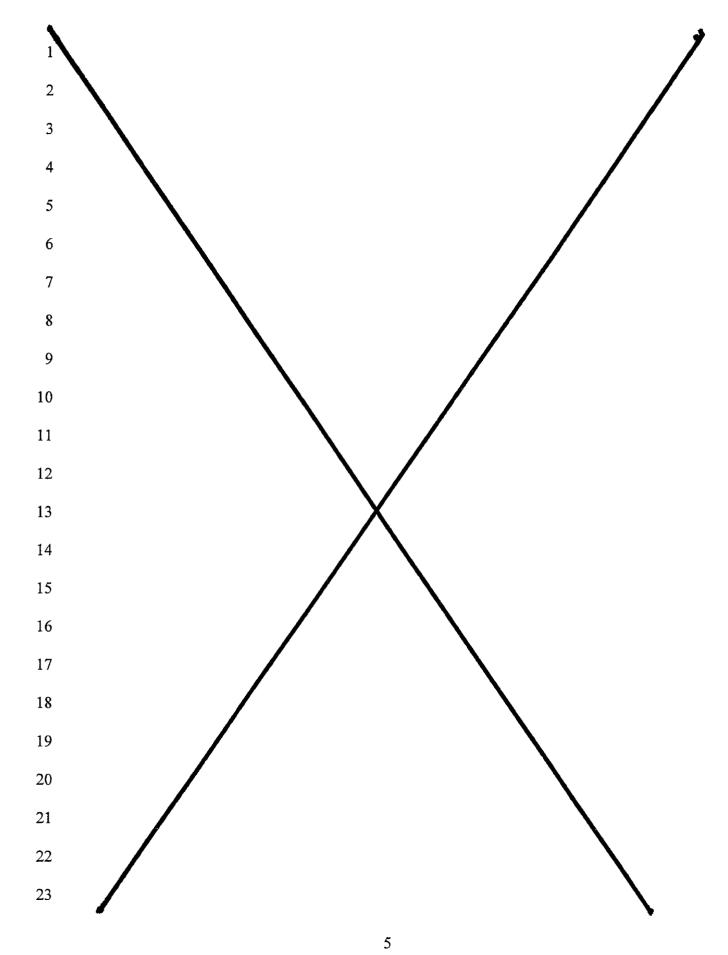
A.

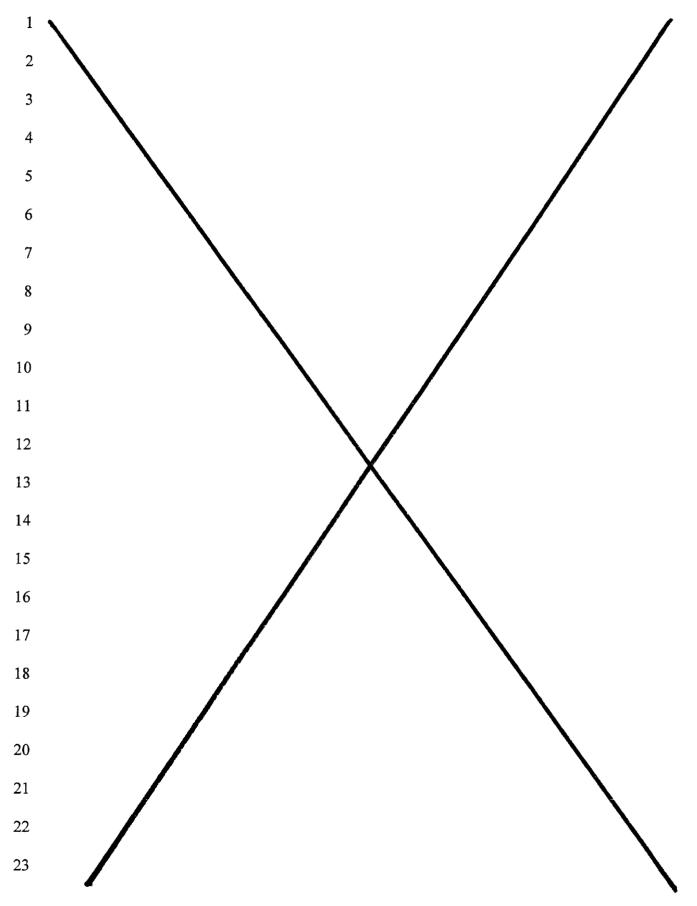
To serve its customers, ACCESS utilizes unbundled network elements (the "UNE-P" platform) that it obtains from BellSouth. Accordingly, ACCESS' ability to provide service of high quality to its customers is dependent upon the degree to which BellSouth fulfills its obligations to ACCESS.

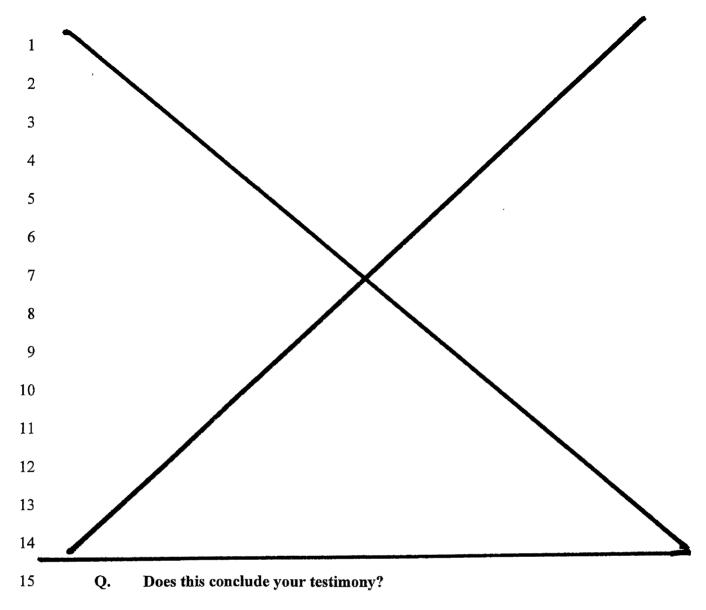
- Q. Describe ACCESS' experiences with BellSouth that bear on BellSouth's application for authority to enter the interLATA market.
 - At the outset, I wish to provide the perspective from which I offer these comments. My understanding is that stated in overall terms, the test to be applied in this case is whether BellSouth has fully opened its network to competition. In applying the test, as it has been formulated into more specific issues, I urge the Commission not to take an overly mechanical approach to its task. To use an old but apt phrase, there is a danger of not seeing the forest because of the trees.

ACCESS' experience is that BellSouth engages in conduct that impedes and stifles competition. In what follows, I am not offering a legal opinion; the relationship between the facts that I will describe and the legal requirements of the 1996 Act will be argued by the attorneys. However, as a businessman involved in the implementation of the 1996 Act in the marketplace, I can see the impact of BellSouth's behavior on the development of competition. Subissue 2(f) asks whether BellSouth has satisfied "other associated requirements" for the

item. One such "associated requirement" is the obligation in Section 251(c)(2) that such interconnection be of a quality at least equal to that which BellSouth provides to itself. It appears to me, for instance, that if BellSouth interacts negatively with ACCESS' customer relationships in a way it does not with its own customers, and in a manner that undermines in the marketplace the competition that the 1996 Act was intended to facilitate, then the Commission should question whether BellSouth is offering interconnection and access of a quality at least equal to that which is provides to itself.







16 A. Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Revised Rebuttal Testimony of Rodney Page has been furnished by (*) hand delivery or by U. S. Mail on this 3rd day of October, 2001, to the following:

(*) Beth Keating Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Jeremy Marcus Blumenfeld & Cohen 1625 Massachusetts Avenue, NW Suite 300 Washington DC 20036

Nancy B. White c/o Nancy Sims BellSouth Telecommunications, inc. 150 South Monroe Street, Suite 400 Miami Florida 32301

James Falvey e.spire Communications 131 National Business Parkway, Suite 100 Annapolis Junction, MD 20701

Michael Gross Florida Cable Telecommunications Assoc. 246 E. 6th Avenue Tallahassee, Florida 32303

Kim Caswell GTE Post Office Box 110 FLTC0007 Tampa, Florida 33601

Richard Melson Post Office Box 6526 Tallahassee, Florida 32314 Scott Sapperstein Intermedia One Intermedia Way MC FLT-HQ3 Tampa, Florida 33619-1309

Donna McNulty 325 John Knox Road, Suite 105 Tallahassee, Florida 32303

Floyd Self/Norman Horton Messer Law Firm Post Office Box 1876 Tallahassee, Florida 32302

Pete Dunbar/Karen Camechis Pennington Law Firm Post Office Box10095 Tallahassee, Florida 32301

Susan S. Masterton Sprint Post Office Box 2214 MC: FLTLH00107 Tallahassee, Florida 32316-2214

Ken Hoffman Rutledge Law Firm Post Office Box 551 Tallahassee, Florida 32302-0551

Andrew Isar Ascent 3220 Uddenberg Lane, Suite 4 Gig Harbor, WA 98335 Matthew Feil Florida Digital Network, Inc. 390 North Orange Avenue, Suite 2000 Orlando, Florida 32801

Angela Green, General Counsel Florida Public Telecommunications Assoc 125 S. Gadsden Street, Suite 200 Tallahassee, Florida 32301-1525

Patrick Wiggins Katz, Kutter Law Firm, 12th Floor 106 East College Avenue Tallahassee, Florida 32301

Scheffel Wright Landers Law Firm Post Office Box 271 Tallahassee, Florida 32302

Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Suite 812 Tallahassee, Florida 32399-1400

Rodney L. Joyce 600 14th Street, N.W., Suite 800 Washington DC 20005-2004

Catherine F. Boone Covad Communications Company 10 Glenlake Parkway, Suite 650 Atlanta, GA 30328-3495

John Kerkorian MPower 5607 Glenridge Drive, Suite 300 Atlanta, GA 30342

CWA (Orl) Kenneth Ruth 2180 West State Road 434 Longwood, FL 32779 ITC^ DeltaCom Nanette S. Edwards 4092 South Memorial Parkway Huntsville, AL 35802-4343

Network Access Solutions Corporation 100 Carpenter Drive, Suite 206 Sterling, VA 20164

Swidler & Berlin Richard Rindler/Michael Sloan 3000 K. St. NW #300 Washington, DC 20007-5116

Suzanne F. Summerlin IDS Telcom L.L.C. 1311-B Paul Russell Road, Suite 201 Tallahassee, Florida 32301

John D. McLaughlin, Jr. KMC Telecom, Inc. 1755 N. Brown Road Lawrenceville, GA 30043-8119

Andrew Klein Kelly Drye Law Firm 1200 19th Street, NW, #500 Washington, DC 20036

Brian Sulmonetti Six Concourse Parkway, Suite 3200 Atlanta, GA 30328

Lori Reese NewSouth Communications Two North Main Street Greenville, SC 29609

Henry Campen, Jr.
Parker Law Firm
P.O. Box 389
Raleigh, NC 27602-0389

Jim Lamoureux AT&T Communications, Inc. 1200 Peachtree Street, NE, Room 8068 Atlanta, GA 30309

Carolyn Marek Time Warner Telecom Regulatory Affairs, Southeast Region Franklin, TN 37069

Joseph A. McGlothlin

Timothy J. Perry

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A.

117 S. Gadsden

Tallahassee, Florida 32301

Telephone: (850) 222-2525 Facsimile: (850) 222-5606 jmcglothlin@mac-law.com

Mark D. Baxter Stone & Baxter, LLP 577 Mulberry Street, Suite 1111 Macon, Georgia 31201-8256 Telephone: (750) 750-9898 Facsimile: (750) 750-9899

mbaxter@stoneandbaxter.com

Attorneys for ACCESS Integrated Networks, Inc.