

1 information from a new trading partner based on  
2 her experiences with EDI which she has indicated  
3 is substantial.

4 MR. BINNIG: Well, I'm still going to object  
5 to the vagueness of the question. I mean, we  
6 haven't defined a particular industry. We  
7 haven't defined a particular EDI relationship.

8 MS. DALE: Excuse me. Speak up.

9 MR. BINNIG: I'm going to object to the  
10 vagueness of the question. It doesn't define a  
11 particular industry or a particular EDI  
12 relationship.

13 JUDGE GUERRA: I would sustain the  
14 objection. Maybe ask an additional question.

15 MS. MARSH: Sure.

16 BY MS. MARSH:

17 Q As it relates to implementation of the EDI  
18 interface in a telecommunications industry  
19 scenario, can you identify for me any situation  
20 in which you believe it would be appropriate for  
21 the implementing party to withhold information  
22 about how that EDI system is working in

1 connection with your systems?

2 A All right. Both parties are implementing  
3 parties, so I'm not sure I really understand the  
4 context of your question.

5 Q Well, let me try to clarify my terms.

6 When I say implementing party, I'm  
7 referring to the party that is trying to  
8 implement the EDI with a trading partner. Does  
9 that make sense?

10 A Well, since both companies are  
11 implementing EDI, both are implementers.

12 Q Would you agree with me that it is usually  
13 one party's decision as to whether to implement  
14 EDI or not?

15 A No, I wouldn't agree with that statement.

16 Q Well, let me ask you this question.

17 As it relates to the implementation of  
18 EDI in connection with this docket, whose  
19 decision was it to implement EDI?

20 A I have no idea.

21 Q Do you know if the various CLECs that are  
22 going to rely on Ameritech's EDI interface had

1 any say in the question of whether EDI or another  
2 interface would be appropriate?

3 A No, I don't know that.

4 Q As it relates to Ameritech's  
5 implementation of an EDI interface, can you  
6 identify for me any situation in which you  
7 believe it would be appropriate for Ameritech to  
8 withhold information about how the interfaces  
9 operate?

10 A I don't know whether I could identify a  
11 situation or not. I think you'd have to be more  
12 explicit before I could make a value judgment of  
13 that nature.

14 Q Have you made any attempt to assess how  
15 EDI is actually working in the relationship  
16 between Ameritech and the CLECs that are using  
17 it?

18 A No.

19 Q Have you made any attempt to look at the  
20 performance results to determine if Ameritech's  
21 implementation of EDI has been successful?

22 A No.

1 Q Can you turn to Page 21 of the same  
2 document, please.

3 Referring you to the last sentence of  
4 the paragraph that is entitled Trading Partner  
5 Implementation. In that sentence, you refer to  
6 pilot testing that is usually run until both  
7 trading partners are comfortable with the  
8 system. Do you see that language?

9 A Yes, I do.

10 Q Can you tell me what you mean by the  
11 phrase comfortable with the system?

12 A It means that both companies are in  
13 agreement and comfortable that the respective EDI  
14 systems are accurately processing exchange data.

15 Q And is it important to continue the pilot  
16 testing until both parties reach that stage of  
17 comfort?

18 A Certainly.

19 Q And why do you say that?

20 A Because if companies are going to transact  
21 business together, each partner to the business  
22 that's being transacted needs to be comfortable

1 with the fact that the other party is receiving  
2 information the way it was intended and can take  
3 action upon it.

4 Q Now, you indicate in that sentence that  
5 that testing can take from a few weeks to several  
6 months?

7 A Hm-hmm.

8 Q Is it unusual in your experience to have  
9 that pilot testing last for several months?

10 A It's more usual than unusual.

11 Q And when you say several months, can you  
12 quantify for me what you think a usual period of  
13 time is for implementation of an interface?

14 A There are so many variables that it's  
15 difficult to quantify it in general for all  
16 companies in all industries. That's why I stated  
17 here that it could be a matter of a few weeks to  
18 several months depending on a variety of factors.

19 Q Would you agree with me that the pilot  
20 testing is probably going to be more extensive if  
21 there are multiple products that will be sold  
22 over the interface?

1 A Not necessarily but could be.

2 Q Would you agree with me that the pilot  
3 testing may be more extensive if there will be  
4 multiple users of the interface?

5 A I'm not sure what you mean by multiple  
6 users of an interface. You mean other companies?

7 Q If an interface has more than one trading  
8 partner.

9 A I think that it's unique and specific to a  
10 given trading relationship.

11 Q Well, let me refer you to Page 22 of the  
12 same document where you talk about expanding  
13 beyond the pilot testing stage.

14 A Right.

15 Q There you indicate that the party who is  
16 implementing EDI should determine whether it  
17 would prefer to add new trading partners or new  
18 transactions; is that correct?

19 A That's correct.

20 Q And you recommend that it is best not to  
21 expand in both directions at once?

22 A Right.

1 Q Why do you make that recommendation?

2 A Because it's easier to manage single  
3 activities or less complex activities from a  
4 management perspective and a resource allocation  
5 perspective.

6 Q Would you agree with me that as new  
7 trading partners are added, that new complexities  
8 may arise?

9 A Possibly, yes.

10 Q And would you agree with me that as new  
11 transactions are added, new complexities or  
12 problems with the interface may arise?

13 A Yes, new complexities could arise.

14 Q Would you agree that it's important that  
15 the interface be thoroughly tested for each type  
16 of transaction that the parties expect to be able  
17 to exchange over the interface?

18 A Yes.

19 Q Referring you to AT&T Cross Exhibit No.  
20 14, could you please identify that exhibit for  
21 the record.

22 A This is a document that I wrote to provide

1 a basic perspective of the use and direction of  
2 electronic data interchange in the health care  
3 supply chain.

4 Q On Page -- it's the very first page  
5 entitled Overview. I don't see a page number on  
6 that.

7 A Overview or Forward?

8 Q Overview followed by the introduction.

9 MR. BINNIG: Fourth page?

10 THE WITNESS: I got you. Okay.

11 MS. MARSH: Yes.

12 BY MS. MARSH:

13 Q There you discuss some of the benefits of  
14 EDI. You indicate that EDI improves accuracy; is  
15 that correct?

16 A It has potential to do that, yes.

17 Q Can you explain to me why an EDI interface  
18 would improve accuracy as to the transactions  
19 being processed?

20 A Depending on the approach taken by the  
21 implementers of EDI and whether they integrate  
22 EDI systems within their internal business

1 systems would have an impact on clerical  
2 accuracy.

3 Q You go on to say that EDI reduces clerical  
4 errors because data entry only needs to be done  
5 one time; is that correct?

6 A Yes, that's correct. I do state that.

7 Q And if transactions were sent across an  
8 EDI interface but then required clerical  
9 intervention on the receiving end before they  
10 could be processed, would you agree with me that  
11 that has potential for introducing clerical  
12 errors to the entire process?

13 A Yes, it could, but that implementation  
14 that you just described is the more typical  
15 approach for most companies in many industries.

16 Q Would you agree that it would be to the  
17 benefit of both trading partners to try to limit  
18 the degree of manual intervention required with  
19 the transactions being processed?

20 A Yes, there could be benefits associated  
21 with that.

22 Q You also identify as a benefit of EDI

1 better customer service; is that correct?

2 A There's a potential for that, yes.

3 Q Could you please explain to me how EDI can  
4 provide better customer service.

5 A By more accurately processing  
6 information. If you can implement an approach  
7 without manual tasks, you have the potential for  
8 designing in-house internal back-end systems to  
9 provide --

10 JUDGE GUERRA: Slow down.

11 THE WITNESS: -- more accurate information to  
12 customer service and other representatives within  
13 your organization.

14 BY MS. MARSH:

15 Q You talk about access to customer  
16 information in that paragraph as well.

17 A Hm-hmm.

18 Q Is that one of the benefits of EDI, that  
19 it does provide ready access to customer  
20 information?

21 A EDI in and of itself does not do that. It  
22 depends on how companies who are going to use EDI

1 choose to then bring that data into their  
2 internal systems and further process it.

3 Q Now, are you familiar with what has been  
4 referred to in this docket as Ameritech's  
5 business rules?

6 A No.

7 Q When you referred to pilot testing in the  
8 articles that you wrote, can you tell me if the  
9 pilot testing generally has different phases  
10 toward completion of that testing?

11 A It can. Doesn't have to, but it can.  
12 It's individually approached.

13 Q Can you identify for me in connection with  
14 the implementation of a complex EDI interface,  
15 such as the one being used by Ameritech, can you  
16 identify for me what would be the appropriate  
17 stages of testing that that system should  
18 undergo?

19 A There would be recommended stages that  
20 could be, you know, recommended by me as a  
21 consultant if I were to be consulting with  
22 Ameritech in that nature. Doesn't have to be

1 broken up into phases, but there could be some  
2 depending on the nature and type of their  
3 implementation approach.

4 Q And if I asked you what your  
5 recommendations would be, could you tell me?

6 A Yes. I would have to probably have more  
7 further knowledge about the internal approach  
8 that Ameritech has taken before I could become  
9 specific and explicit and unique to Ameritech  
10 though.

11 Q So given the information that you have  
12 reviewed to this day, you cannot provide us with  
13 any recommendations as to the type of testing  
14 that would be appropriate for Ameritech to ensure  
15 that its EDI interfaces are indeed working?

16 A At this point, I don't think I have enough  
17 knowledge of Ameritech's internal systems to make  
18 that evaluation.

19 Q Now, you've offered into evidence here two  
20 volumes called the Electronic Services Ordering  
21 Guide; is that correct?

22 A Hm-hmm.

1 Q Now, isn't it true that that guide only  
2 tells a CLEC like AT&T how to format the  
3 transactions that it will be sending across the  
4 interface?

5 A Yes, it provides that data.

6 Q Those guides do not purport to be a  
7 complete set of data that a CLEC would need to  
8 build to Ameritech's EDI interface, is it?

9 A I don't know that I understand the nature  
10 of your question. To me they would provide that  
11 kind of information. That's my opinion that they  
12 do.

13 Q Let me try it this way.

14 Using those guides alone, do you  
15 believe that a CLEC could appropriately build to  
16 the interface and send over successful  
17 transactions?

18 A Yes, I do.

19 Q Well, isn't it true that those guides  
20 don't include a lot of information that would be  
21 necessary for a CLEC to send a transaction  
22 successfully?

1           A    It's my understanding and my opinion that  
2           the intent of an Electronic Service Ordering  
3           Guide as this is is to provide the EDI  
4           requirements. That's the scope and nature of  
5           this particular document for EDI.

6           Q    Do those guides provide CLECs with any  
7           information about the type of data that must be  
8           put into each of the fields identified by the  
9           guide?

10          A    Yes, it does.

11          Q    Do those guides provide information, for  
12          instance, about the USOCs that CLECs must need or  
13          must use to order products?

14          A    They provide where a USOC code is  
15          required.

16          Q    Do they provide the actual codes?

17          A    No, they don't.

18          Q    Do those guides tell CLECs whether a  
19          particular product requires one USOC code or two  
20          USOC codes?

21          A    I couldn't say whether it indicates that,  
22          if that degree is specificity or not. I do

1 believe though it provides guidance as to where  
2 these USOCs can be obtained.

3 Q Right. But my question was do those  
4 guides as entered into evidence by you contain  
5 information that would allow a CLEC to determine  
6 whether a single USOC or two USOCs are necessary  
7 for any individual product or service?

8 A I believe it does in certain portions.

9 Q Can you show me those portions?

10 A It's my opinion that in Section 5 on Page  
11 26 of the Transaction Layout Ordering 850 Section  
12 for transactions for ordering, that the use of  
13 the SI segment identifies where there may be more  
14 than one USOC that might be necessary in order to  
15 appropriately and comprehensively identify  
16 services and features that may be ordered.

17 Q And my question was, does that guide  
18 contain all the information that a CLEC would  
19 need to determine whether any particular product  
20 or service requires a single USOC or two USOCs?

21 A I can't answer that question yes or no.

22 Q Why not?

1           A    Because I'm not familiar enough with USOCs  
2   to know whether one or more may be required to  
3   actually order any of these services or features.

4           Q    For instance, if AT&T wanted to order  
5   Caller ID With Name for a customer, will that  
6   guide tell AT&T --

7                    If AT&T wanted to order Caller ID With  
8   Name for one of its customers, would the  
9   Electronic Service Ordering Guide tell AT&T  
10   whether to put in a single USOC or two USOCs for  
11   that product?

12           A    There is a section called Business  
13   Scenarios that provides guidance as to some of  
14   the more typical and appropriate transactions  
15   that a business partner with Ameritech could  
16   conceivably and appropriately be expected to  
17   exchange.

18                    It provides a variety of those  
19   scenarios and then provides examples of the kind  
20   of data that should be inserted into the EDI  
21   transaction to support that specific kind of a  
22   business scenario and business transaction.

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1           Q   That was not the answer to my question.  
2           Let me try it again.

3                        If AT&T wanted to order Caller ID With  
4           Name for one of its customers, would the  
5           Electronic Service Ordering Guide tell AT&T as to  
6           that particular product whether one USOC or two  
7           USOCs is required?

8           A   I don't know if there is an example of a  
9           business scenario in here for Caller ID With Name  
10          or not. It would take some time for me to review  
11          this to see if that particular scenario was  
12          identified.

13                    JUDGE GUERRA: Please slow down.

14                    THE WITNESS: I'm sorry.

15                            I can't answer that explicitly. I  
16          would have to take some time to review the  
17          business scenario.

18                    BY MS. MARSH:

19                            Q   Would you agree with me that the business  
20          scenarios that are contained in the guide are  
21          just a representative sample of all the scenarios  
22          that a CLEC may encounter?

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1           A    I don't know whether they're a  
2   representative sample or a comprehensive listing.

3           Q    Have you made any attempt to determine  
4   whether the most common scenarios encountered by  
5   CLECs are covered by the examples listed in the  
6   guide?

7           A    I have not done any research into that.  
8   It's my opinion and my observation that they do.

9           Q    And what is that opinion and observation  
10   based on?

11          A    The work that I did previously on the ACI  
12   project.

13          Q    Have you interviewed or discussed with any  
14   CLECs what their needs are in connection with  
15   your determination that those do cover the most  
16   common scenarios?

17          A    No.

18          Q    And I think earlier you indicated that you  
19   have not reviewed any performance results as it  
20   relates to the use of the EDI interface; correct?

21          A    No. I have not been asked to do that.

22          Q    Based on the actual orders that have been

1 transmitted, have you made any attempt to  
2 determine what the most common type of orders are  
3 that currently --

4 A I haven't been asked to investigate that.

5 Q Do you know if the scenarios in the guides  
6 cover a CLEC's ordering of PBX?

7 A No, I don't know that.

8 Q Do you know if the guides would tell a  
9 CLEC how to order DID trunks?

10 A No, I don't know that.

11 Q Do you know if the Electronic Service  
12 Ordering Guide would inform a CLEC how to order  
13 Centrex services?

14 A There is a business scenario for Centrex.  
15 There is -- I see a business scenario for  
16 assuming a PBX account. There is a business  
17 scenario that would describe the example of  
18 adding a DID trunk, adding features, and so on.

19 Q Are those guides region wide or are they  
20 only for the state of Illinois?

21 A I do not know that.

22 Q Do you know if there would be any

1 distinction between a CLEC's attempt to order  
2 services in Illinois as opposed to Michigan?

3 A I don't know that, no.

4 Q Do you know if the guides provide the  
5 CLECs with any information about valid NPAs for  
6 telephone numbers?

7 A I think they do provide a direction and a  
8 guidance as to where that information can be  
9 obtained.

10 Q But do the ordering guides themselves  
11 contain comprehensive information about valid  
12 NPAs for specific phone numbers?

13 A They point to other resource documents  
14 that provides -- or resources that provide that  
15 information.

16 Q Then is your answer that the ordering  
17 guides do not contain that type of information?

18 A That's correct.

19 Q Do the ordering guides contain  
20 comprehensive information about valid PIC codes?

21 A I believe it points to other resources to  
22 obtain those codes. And that's quite typical for

1 most implementation guides to refer to other  
2 resources for other more explicit code lists.

3 Q So your answer is that those ordering  
4 guides do not in themselves contain comprehensive  
5 information about valid PIC codes that can be  
6 used by CLECs in connection with transactions?

7 A They don't contain a listing of PIC codes.

8 Q Now, the ordering guides as they have been  
9 presented here today, can you tell me when that  
10 form of the ordering guide was first made  
11 available to CLECs for their use?

12 A I don't know that.

13 Q Isn't it true that they were first made  
14 available to CLECs through this docket when they  
15 were attached to your testimony and distributed?

16 A I don't know.

17 MS. MARSH: Thank you. That's all the  
18 questions AT&T has.

19 AT&T would move the admission of AT&T  
20 Cross Exhibits 13, 14 and 15.

21 JUDGE GUERRA: Any objection? Let the record  
22 reflect that AT&T Cross Exhibits 13, 14 and 15

1 are admitted.

2 (Whereupon, AT&T Cross  
3 Exhibit Nos. 13, 14 and 15 were  
4 admitted into evidence  
5 as of this date.)

6 JUDGE GUERRA: Let's go off the record for a  
7 second.

8 (Discussion off the record.)

9 CROSS EXAMINATION

10 BY

11 MR. COHEN:

12 Q Ms. Foerster, my name is Gary Cohen. I  
13 represent MCI. I have just a few very few  
14 questions for you.

15 On Page 4 of your direct testimony at  
16 the top, the first question and answer, you make  
17 reference to provisioning functions. Do you see  
18 that in the third sentence?

19 And you indicate that the provisioning  
20 functions include firm order confirmation, order  
21 status, parens, i.e., jeopardy notification, and  
22 order completion. Do you see that?

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1           A   Right.  Yes, I do.

2           Q   Okay.  Would you tell me what you mean by  
3   jeopardy notification?

4           A   It's my understanding that a jeopardy  
5   would be a notification going back to the  
6   ordering organization indicating that the order  
7   as it was originally placed may not be able to be  
8   provisioned within the time frame requested.

9           Q   So that would allow the carrier to  
10   determine whether the order can be completed as  
11   originally planned?

12          A   As originally planned within the time  
13   frame requested.

14          Q   And I take it that is an important  
15   function for an EDI interface as you understand  
16   it?

17          A   I don't think that's unique and specific  
18   to EDI.  That's specific to any kind of a  
19   business transaction.

20          Q   And that would be important for the  
21   carrier or whatever particular party wanted,  
22   needed that type of information; right?

1           A    I think any company ordering products or  
2 services from another company would like to know  
3 when they're going to get those products or  
4 services, yes.

5           Q    And when they're in jeopardy?

6           A    And when that may not occur, exactly.   But  
7 that's not specific to EDI.

8           Q    Fair enough.

9                         Also on that page you indicate your  
10 conclusion on the bottom there.   You say  
11 Ameritech's EOS guide contains the information  
12 competing, local exchange carriers need to modify  
13 or build systems that will enable them to use  
14 Ameritech's EDI interfaces?

15          A    Yes.

16          Q    I read that correctly?

17          A    Yes.

18          Q    Now, do I understand you, that you reached  
19 that conclusion without talking to a single CLEC;  
20 is that right?

21          A    Yes.

22          Q    You didn't talk to large ones, small ones,

1 not a single one?

2 A No, I didn't.

3 MR. COHEN: I have nothing further.

4 JUDGE GUERRA: Any further cross  
5 examination? Redirect?

6 MR. BINNIG: Can we have a second?

7 JUDGE GUERRA: Ten-minute break.

8 (Recess.)

9 JUDGE GUERRA: Let's go back on the record.  
10 Any redirect?

11 MR. BINNIG: Yes, your Honor.

12 REDIRECT EXAMINATION

13 BY

14 MR. BINNIG:

15 Q Ms. Foerster, you recall that Ms. Marsh  
16 asked you several questions regarding manual  
17 intervention in connection with EDI?

18 A Yes.

19 Q Are you aware of any industry using EDI  
20 where there is no manual intervention in  
21 connection with the EDI?

22 A No, I'm not aware of any industry.

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