

1 but correct me if I'm wrong?

2 A. Well, I may have said -- let me try this because
3 there is a lot wrapped up in there. Throughout the
4 process of developing there -- these systems there have
5 been a number of activities that relate to the things
6 that you described.

7 Whether that's all been pulled together and
8 documented outside my testimony as a quality analysis,
9 I'm not aware of that, I don't know. You know -- I
10 can't say that there hasn't been that done.

11 Q. It has not been made a part of this record in any
12 event, is that correct, to your knowledge?

13 A. Right, a written document has not been made a part
14 of this record, but I would say that by virtue of our
15 having demonstrated the comparable systems to the
16 Commission we've provided information that assists in
17 making that kind of determination.

18 Q. Okay. And other than that that information
19 related to the ongoing efforts over a period of -- of
20 months and perhaps longer, you're not aware of any
21 specific analysis BellSouth has done to determine
22 whether its provision of OSS services is
23 nondiscriminatory, is that correct?

24 A. I guess the -- the way I'd have to answer that

1 question is to say that the -- the marching orders given
2 to the systems designers was to provide
3 nondiscriminatory access, so everything that's been done
4 in the development of this system has been done with a
5 view of making a determination as to what was necessary
6 to provide nondiscriminatory access. And my testimony
7 is a summary of that activity.

8 Q. Okay. And -- and now you're at the point in time
9 at which BellSouth says we've done it, provided
10 nondiscriminatory access. And my question is now that
11 you've reached that point, have you done any analysis,
12 is there any analysis that says now that we've reached
13 this point this is how we know at BellSouth because
14 we've done this analysis that we're there?

15 MR. ELLENBERG: Chairman Sanford, I'm going to
16 object. This question has been asked and we keep
17 circling back to it, I think. It's very repetitive at
18 this point. What's in the record will speak for itself,
19 I believe, and I think Ms. Calhoun has described what
20 she has put in her testimony and elsewhere.

21 MR. STOUGHTON: Madam Chair, I'm prepared to
22 move on, would it please the Commission.

23 CHAIR SANFORD: Thank you.

24 Q. (MR. STOUGHTON) Ms. Calhoun, are you familiar

1 PLACE: Dobbs Building, Raleigh, North Carolina

2 DATE: Friday, September 26, 1997

3 TIME IN SESSION: 9:00 A.M. TO 4:55 P.M.

4 BEFORE: Commissioner Jo Anne Sanford, Presiding

Commissioner J. Richard Conder

5 Commissioner Allyson K. Duncan

Commissioner Judy Hunt

6 Commissioner Ralph A. Hunt

Commissioner Robert V. Owens, Jr.

7 Commissioner William R. Pittman

8

IN THE MATTER OF:

9 DOCKET NO.: P-55, SUB 1022

BellSouth Telecommunications, Inc.

10 BellSouth's In-Region InterLATA Service Pursuant
to Section 271 of the Telecommunications Act of 1996

11

12 Volume 8

13

A P P E A R A N C E S:

14

FOR BELLSOUTH TELECOMMUNICATIONS, INC.:

15

A.S. Povall, Jr., General Counsel-North Carolina

16 William J. Ellenberg, II - General Attorney

Edward Rankin, General Attorney and

17 Phil Carver, General Attorney

BellSouth Telecommunications, Inc.

18 1521 BellSouth Plaza

Post Office Box 30188

19 Charlotte, North Carolina 28230

20 FOR BELLSOUTH LONG DISTANCE, INC.:

21 Jim Cain and Gray Styers

Kilpatrick Stockton

22 Attorneys at Law

Post Office Box 300004

23 Raleigh, North Carolina 27622

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1 done to assure itself that it's providing
2 nondiscriminatory access?

3 A. Yes, with respect to volume testing and functional
4 testing.

5 MR. STOUGHTON: I'd like to have marked for
6 identification AT&T Calhoun cross-examination exhibit
7 number four, and I'll ask that it be distributed to the
8 Commission and the witness and counsel, please.

9 GC AT&T CROSS EXHIBIT 4

10 (Identified)

11 (Exhibit passed out.)

12 MR. STOUGHTON: For the record, AT&T cross
13 exhibit four is an excerpt of the Ameritech Order. It's
14 paragraph 212 of the Ameritech Order excerpted, and with
15 the footnotes submitted. And I'll be referring to only
16 a portion of it here.

17 Q. (MR. STOUGHTON) Ms. Calhoun, what I'm going to be
18 doing here, just so we can perhaps shorten up this a
19 little bit, there are seven numbered items in the -- I
20 guess it's the first paragraph sentence of this
21 paragraph, and I will represent to you that it's types
22 of data that the FCC suggested to Ameritech, that
23 Ameritech should provide in a subsequent 271
24 application.

1 What I want to do is just ask you whether
2 you're aware of whether BellSouth has data in each of
3 these areas. So if we could go through these one by
4 one.

5 Q. The first area is average installation intervals
6 for resale. Are you aware of whether BellSouth has
7 information collected in that area?

8 A. I think I would have to defer on that answer to
9 Mr. Moore, but -- well, something else about your
10 question that concerned me.

11 What you handed me is labeled "Empirical OSS
12 Evidence Required by the FCC", and your description was
13 information that was suggested by the FCC.

14 MR. STOUGHTON: Madam Chair, I'm prepared to
15 strike the title on this. We can line through that if
16 that's a problem for the witness.

17 CHAIR SANFORD: That's fine.

18 Q. (MR. STOUGHTON) On item number one, you say you
19 need to defer to, was it, Mr. Moore?

20 A. Yes.

21 Q. All right. Item number two is average
22 installation intervals for loops.

23 Are you familiar with whether there is data
24 available in BellSouth on that category?

1 A. Again, I would defer to Mr. Moore.

2 Q. All right. How about item number three,
3 comparative performance information for unbundled
4 network elements?

5 A. Again, maybe I could short circuit this if we're
6 going to go through one through seven, I think I would
7 have to defer to another witness on all of these.

8 Q. Okay. And do you know that Mr. Moore does have
9 information or could respond to these areas?

10 A. I don't know that for a fact but we would be the
11 -- the likely candidate.

12 Q. You simply know it's not you, right?

13 A. That's correct.

14 Q. Okay. Thank you.

15 MR. STOUGHTON: Let me -- I said -- I said
16 thank you and that probably indicated to you that I was
17 done but I guess I'm not --

18 A. (Interposing) Oh!

19 Q. -- quite.

20 A. Okay.

21 Q. When you arrived at your conclusion which you
22 testified to here that BellSouth is providing
23 nondiscriminatory access to its OSS, I take it then you
24 did not rely on any of the types of data that are

1 described in items one through seven, is that a fair
2 statement?

3 A. That's correct. I relied on my experience with
4 BellSouth's retail system, my experience with the CLPs
5 systems, my experience with both having and observing
6 customer contacts, and how that information is actually
7 used in the course of the customer contact. So I was
8 looking at it from the customer's perspective, the
9 functionality that was available, and how it would
10 affect the CLPs ability to serve its customers, as well
11 as looking at it from a perspective of whether the
12 volumes and capacity of the systems were sufficient to
13 support the forecasted volumes.

14 Q. And I know we talked about this yesterday, and I
15 asked you yesterday quite a series of questions about
16 whether you knew of analyses in BellSouth that -- that
17 you might have relied upon to establish
18 nondiscriminatory access.

19 I want to ask you a -- what I hope is a
20 simpler and more narrow question now, and that is other
21 than the documents that are in your testimony, or
22 referred to in your testimony, did you personally rely
23 on any other documents in arriving at your conclusion
24 that the BellSouth OSS are nondiscriminatory?

1 A. No.

2 And -- I have primarily relied on using the
3 systems, just working with the systems, and working
4 one-on-one with the developers and experts for the
5 various systems.

6 (Mr. Stoughton and Mr. Campen confer.)

7 Q. (MR. STOUGHTON) Ms. Calhoun, I believe I'm almost
8 done, but what I want to do with you now is -- is go
9 through some features, and what I'm going to be asking
10 you is whether RNS provides the feature and whether the
11 equivalent, BellSouth offered OSS or CLPs, provides a
12 similar capability or the same capability.

13 And to the extent that I'm rephrasing some
14 ground I apologize, I just haven't been able to keep
15 track of whether you've been asked all these questions.
16 So, some of them you may have been, and I apologize in
17 advance for that.

18 When you showed us RNS in your demonstration,
19 you showed us that when a section was completed there
20 was a change to the color of the button to indicate that
21 it was completed.

22 Would you agree there is no equivalent
23 function in LENS or EDI?

24 A. While I would agree that there is no equivalent

ATTACHMENT 3

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STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
MONTGOMERY, ALABAMA

IN RE: BELLSOUTH TELECOMMUNICATIONS,
INC.,

DOCKET NO. 25835 VOL. II

PROCEEDINGS taken before the Alabama
Public Service Commission in the
above-referenced matter on August 19,
1997, (morning session) commencing at
9:05 a.m. in the hearing room of the
Alabama Public Service Commission, RSA
Union Building, 100 North Union Street,
Room 904, Montgomery, Alabama, before Sha
Hurst, Certified Shorthand Reporter and
Notary Public in and for the State of
Alabama at Large.

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Alexander

P R O C E E D I N G S

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JUDGE GARNER: For the record, we're here this morning of August the 15th, 1997 for the continued hearing of Docket 25835.

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Are there any preliminary matters that we need to address before we proceed with the BellSouth witness?

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MR. ALEXANDER: Your Honor, Tom Alexander for BellSouth. At the end of the hearing yesterday you had requested a copy of the exhibit, that the performance measurement portion of the AT&T/BellSouth interconnection agreement be admitted. I think Your Honor marked it as Petitioner's Hearing Exhibit No. 12?

JUDGE GARNER: That's correct.

1 MR. ALEXANDER: I have given the
2 court reporter a copy and have
3 copies for the parties for the
4 record.

5 JUDGE GARNER: If you will,
6 distribute those.

7 JUDGE GARNER: And I take it you are
8 Ms. Calhoun?

9 MS. CALHOUN: Yes.

10 JUDGE GARNER: If you will stand and
11 raise your right hand, please,
12 ma'am.

13 (Witness sworn)

14 JUDGE GARNER: You may be seated.

15 MR. ELLENBERG: Your Honor, I'm
16 William Ellenberg. I'm
17 appearing on behalf of
18 BellSouth Telecommunications.
19 I'll be doing direct
20 examination of Ms. Calhoun.
21 Shall we proceed?

22 JUDGE GARNER: Yes. Proceed.

23

1 GLORIA CALHOUN, of lawful age,
2 having first been duly sworn, testified
3 as follows:

4
5 DIRECT EXAMINATION

6 BY MR. ELLENBERG:

- 7 Q. Will you state your full name for the
8 record, please?
- 9 A. My name is Gloria Calhoun.
- 10 Q. What is your business address, Ms.
11 Calhoun?
- 12 A. 675 West Peachtree Street, Northeast,
13 Atlanta, Georgia.
- 14 Q. By whom are you employed at that address?
- 15 A. By BellSouth Telecommunications, Inc.
- 16 Q. What is your position with BellSouth
17 Telecommunications, Inc.?
- 18 A. My title is Director of Regulatory
19 Planning.
- 20 Q. Ms. Calhoun, did you cause to be prepared
21 and filed in this proceeding 64 pages of
22 pre-filed direct testimony in question
23 and answer form?

1 you can move information back and forth.
2 It's not that complicated an
3 undertaking. And finally, that's
4 something that BellSouth service reps do
5 all the time. We're working and pulling
6 information back and forth from different
7 places.

8 Q. That last process you described is
9 generally referred to as cutting and
10 pasting; is that correct?

11 A. Yes.

12 Q. We'll talk about that in a second.

13 Back to CGI, regardless of
14 whether or not BellSouth should or should
15 not have done it, if a CLEC wants to have
16 the pre-ordering and ordering system
17 communicate information directly with
18 each other, the CLECs will have to
19 develop software on their own to be able
20 to do that?

21 A. Yes.

22 Q. And in order to do that the CLECs will
23 need to have the CGI specification for

1 LENS; is that correct?

2 A. Yes, that's correct.

3 Q. Now, on Page 24 of your rebuttal
4 testimony specifically about the first
5 ten lines or so, you discussed the CGI
6 specification for LENS. And my question
7 is, when did BellSouth complete
8 development of the CGI specification?

9 A. I don't know that I can say that
10 BellSouth completed development of that.
11 BellSouth had it in progress and
12 discontinued work on it in progress
13 because no CLEC was expressing an
14 interest in it. We had had a number of
15 discussions with AT&T about it, and we
16 had kind of stops and starts. And at the
17 point that AT&T told us that they weren't
18 interested in pursuing us, we stopped
19 spending time and money on it. We have a
20 draft version that's available that could
21 be updated and made available, but in the
22 absence of anyone asking for it, that
23 doesn't seem like a prudent use of our

ATTACHMENT 4

ECIC Issue # 96-003-STR
Electronic Bonding Alternative Solution(s)
Issue Resolution Statement
March 1997

As a result of recent industry developments, including the Ordering and Billing Forum's choice of EDI for Local Service Ordering, an ECIC Steering Subcommittee task group was created to seek alternative electronic communication interfaces. The task group's recommendation, as detailed below, should in no way be interpreted as diminishing ECIC's commitment to CMIP for existing and future applications. In fact, ECIC anticipates continuing to explore CMIP implementations of Local Service ordering and pre-ordering as the OBF requirements become available.

• The task group's recommendation is four-fold:

1. Utilize Electronic Data Interchange (EDI) over TCP/IP and Secure Socket Layer 3 (SSL3) for the interface.
2. Adapt the ECIC implementation of the T1.227/228 Standards to an EDI format.
3. Create EDI formats for Local Service Requests, specifically pre-order functions.
4. Create/charge an ECIC task group to evaluate and recommend interface technologies that meet industry needs.

• The ECIC Steering Subcommittee, in accepting the task group's recommendation, and has taken the following actions:

1. Instruct various ECIC subcommittees to immediately address an EDI/SSL3/TCP/IP interface.
2. Request the TCIF EDI Committee to provide EDI transaction sets for the implementation of Trouble Administration standards as well as transaction sets for Local Service pre-order functions.
3. Create an ECIC task group to evaluate CORBA and DCE/RPC technologies for possible use. (See NTRG Charter on next page)
4. Request OBF to disseminate to its members the results of the ECIC evaluation for their information.
5. Determine on a case-by-case basis the appropriate interface(s) to be provided for other ECIC applications.

The NTRG Charter (New Technologies Research Group)

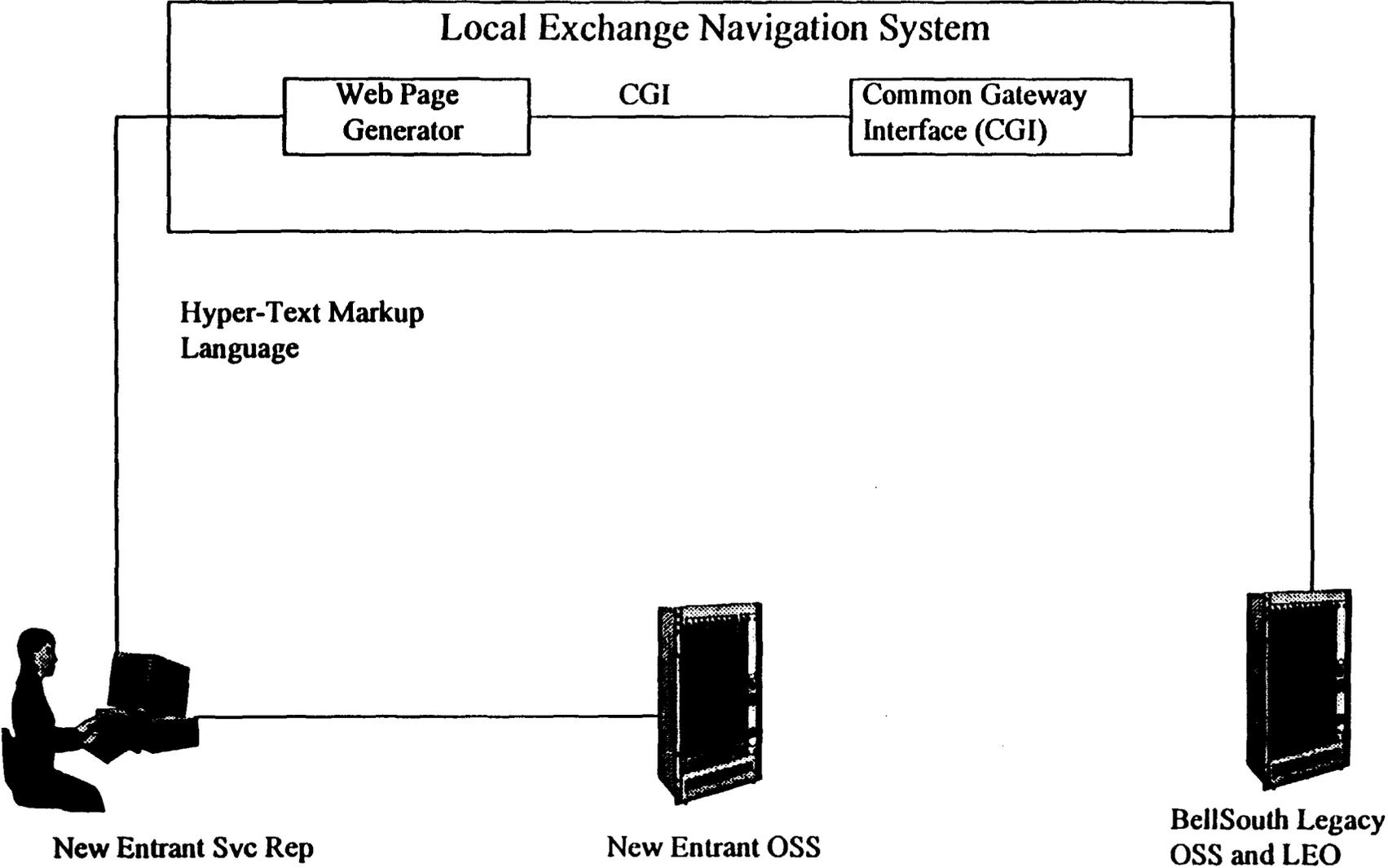
The charter of the NTRG is to research, analyze and report on possible long term interface solutions under the following guidelines:

1. Investigation limited to Corba and DCE/RPC
2. Application to Application (not GUI)
3. No restriction as to company size of operations
4. Develop a technology description
5. Critique Availability and implementation time frame
6. Identify barriers to ECIC implementation
7. Utilize the technical checklist presented in resolution proposal to ECIC Issue #96-003-STR
8. Report to the Steering Subcommittee at ECIC #13 (September, 1997)

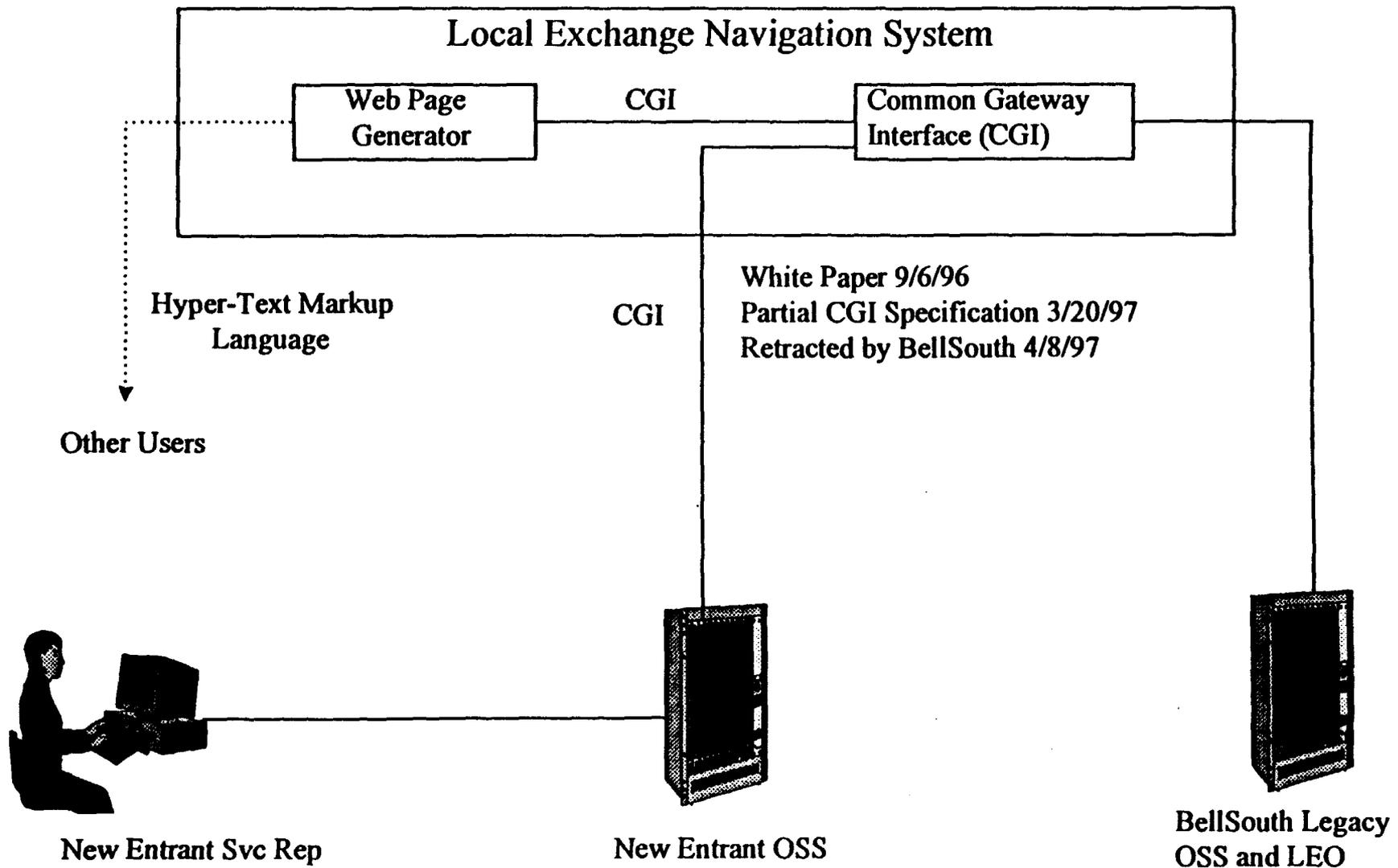
The immediate application focus of the group should be on Pre-ordering, Ordering and Trouble Administration.

ATTACHMENT 5

BellSouth's LENS is a Human to Machine Interface



BellSouth's LENS is a Human to Machine Interface CGI Can Be An Effective Method to Allow Machine to Machine Operation



**BellSouth's LENS is a Human to Machine Interface
HTML is not Usable for a Machine to Machine Interface**

