

1 conversation off, introduced you to Mr. Alden, and
2 then let you and Mr. Alden talk for the vast --

3 A. Yes, that's correct.

4 Q. -- majority of the call, and then
5 Mr. Turner made some comments at the end?

6 A. Yes.

7 Q. You've obviously seen now what
8 Mr. Turner has said in 96-608, which is a Kentucky
9 case from the Kentucky Public Service Commission.
10 Did Mr. Turner or Mr. Alden ever tell you that
11 they were talking to you for the purpose of
12 getting information to put in a regulatory
13 proceeding here in front of Kentucky or from the
14 Federal Communications Commission?

15 A. No.

16 Q. Were you surprised to learn that your
17 conversation appeared in affidavits in front of
18 the FCC and in front of the Kentucky Public
19 Service Commission?

20 A. Yes.

21 Q. Did Mr. Turner or Mr. Alden ever talk
22 to you about the main purpose of what Albion was
23 doing -- that is, the integration of the EDI and
24 the CGI interfaces?

25 A. I mentioned that that's what we were

1 doing at the beginning of the conversation,
2 because Mr. Alden was concerned about parsing the
3 CSR. And I told him I wanted to make it clear up
4 front that what we had done was with, you know, me
5 only working a limited amount of time on that, a
6 few days at most.

7 And it was kind of an afterthought,
8 really, to the whole project, that we were
9 originally contracted to do the pre-order CGI
10 interface integration, the firm order, PC-EDI
11 integration, and that the CSR was really something
12 that kind of came because we had a little bit of
13 time left.

14 Q. And with that explanation, did
15 Mr. Turner -- or Mr. Alden, I guess more
16 accurately, continue to talk to you for 30 minutes
17 about the CSR parsing?

18 A. Yes, that's correct.

19 Q. Did MCI ever ask Albion to assist with
20 doing any integration of the CGI interface or the
21 EDI interface?

22 A. No.

23 Q. Did they ever ask Albion to assist with
24 doing CSR parsing or customer service record
25 parsing?

1 A. No.

2 Q. Is Albion available to MCI, AT&T or
3 Sprint or any other carrier to help with those
4 type systems or software development?

5 BY MR. BERMAN:

6 A. Yes.

7 Q. In doing the programming work that you
8 were doing, Mr. Runnels, were you attempting to
9 build an order for EDI based off of a customer
10 service record, a CSR?

11 A. No.

12 Q. You mentioned how little time it took.
13 How long did that -- the customer service record
14 parsing that you did do, how long did it take you
15 to accomplish that?

16 A. Three days.

17 Q. How much time in actual hours to do the
18 parsing that's shown on page 25 of the Albion
19 report, which is an exhibit to this deposition?

20 A. I can't say exactly for the parsing. I
21 was doing the window development, parsing and the
22 testing of that all during those three days.

23 Q. So some amount of time less than three
24 days for just the parsing piece?

25 A. Yes. Maybe just eight hours for that

1 piece of it, for the majority of that. Obviously,
2 there was some testing that went along with that
3 to make sure it was working properly.

4 Q. Were you given instructions from
5 BellSouth how to accomplish this customer service
6 record parsing that you did do?

7 A. I asked Alexander Dizon, who was my
8 primary business contact, if there was a standard
9 format or technical specification that I could see
10 for the CSR. And he said no.

11 And I had surmised on my own what some
12 of the identifiers within the string that we got
13 back meant, such as BN for billing name or DA for
14 delivery address or something like that. And I
15 clarified that with him. He couldn't tell me
16 exactly what came back always or what didn't come
17 back always.

18 Q. He being Mr. Alex Dizon?

19 A. Yes, that's correct. And as I told you
20 before, I told him, I said, "Well, you know, what
21 level do you want me to parse this?" And he said,
22 "Well, just could do whatever you can with what
23 time you have." And that's what I did.

24 Q. The level that you're talking about,
25 Mr. Runnels, did you for Albion parse the listed

1 name, listed address, city, state and zip code
2 from the information that you had?

3 A. That is correct.

4 Q. And would that information have
5 included the CGI specification?

6 A. Yes.

7 Q. Both of you gentlemen were asked
8 questions about a data dictionary and a CSR --
9 customer service record layout, or schemata.

10 Mr. Berman, let me start with you. I
11 think you -- if I recall correctly your testimony
12 from the earlier cross-examination, you said you
13 really weren't familiar with the data dictionary,
14 that term; is that correct?

15 BY MR. BERMAN:

16 A. That's correct. I could try to
17 remember a book definition of it from way long
18 ago, but in the types of technology we work with,
19 that's not a piece of documentation that we ever
20 work with.

21 Q. So I guess based on your lack of
22 familiarity with it, does Albion routinely use a
23 document or a guide called a data dictionary in
24 doing this job with other customers?

25 A. Not at all.

1 Q. Did you have a data dictionary supplied
2 to you from BellSouth, either of you?

3 A. No.

4 BY MR. RUNNELS:

5 A. No.

6 Q. Did either of you have a customer
7 service record or a CSR layout, a schemata?

8 BY MR. BERMAN:

9 A. No.

10 Q. I guess in the absence of having either
11 of those, were you able to still do the CSR
12 parsing that was accomplished, without either of
13 those documents?

14 BY MR. RUNNELS:

15 A. That is correct.

16 Q. To do the EDI order that you did do,
17 did you need to do more granular -- or take it to
18 a lower level parsing of the CSR, the customer
19 service record, than you did?

20 A. The customer service record was not
21 used in any way to generate the order.

22 Q. Did I hear you earlier say you did
23 about five numbers, folks that you had had
24 authority to look at the CSRs, customer service
25 records?

1 A. That's correct.

2 Q. And for those five customer service
3 records, you were able to parse those correctly?

4 A. To the level that is shown within the
5 document.

6 Q. To the level that you did here, did the
7 parsing work without any problems is what I'm
8 asking.

9 A. Yes.

10 Q. And when we say shown here, I'm
11 referring to page 25 of the exhibit attached to
12 the Albion report. Is that the same document --

13 A. Yes.

14 Q. -- that you're referring to?

15 A. That's what I was talking about.

16 Q. I believe both you gentlemen were asked
17 questions about CRIS, C-R-I-S, database that
18 BellSouth has. Do either of you all know what a
19 CRIS database is?

20 BY MR. BERMAN:

21 A. No.

22 Q. Do you know, Mr. Runnels?

23 BY MR. RUNNELS:

24 A. Well, we do send -- what I referred to
25 earlier about having billing appear, billing for

1 BellSouth Communications appear on BellSouth BST
2 invoices, they call CRIS invoicing. And in fact,
3 I didn't even -- no one there seemed to know what
4 CRIS stood for. I found that out today.

5 Q. Do you know that CRIS stands for
6 customer record inventory or information system?

7 A. I know that today.

8 Q. Today was the first time you learned
9 that?

10 A. Yes.

11 Q. So you didn't really use this CRIS
12 database to do the work that Albion did for
13 BellSouth?

14 A. Certainly not directly.

15 (A short recess was had.)

16 MR. ALEXANDER: That's all the
17 questions that BellSouth has.

18

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25

DEPONENT'S AFFIDAVIT

I, GREG BERMAN, the witness
herein, have read the transcript of my testimony,
and the same is true and correct to the best of
my knowledge. Any corrections and/or additions,
if any, are listed separately.

Greg Berman

Sworn to and subscribed before me,
this ____ day of _____, 19__.

(Notary Public)

My Commission Expires -----

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DEPONENT'S AFFIDAVIT

I, JACK RUNNELS, the witness
herein, have read the transcript of my testimony,
and the same is true and correct to the best of
my knowledge. Any corrections and/or additions,
if any, are listed separately.

Jack Runnels

Sworn to and subscribed before me,
this ___ day of _____, 19__.

(Notary Public)

My Commission Expires _____

C E R T I F I C A T E

1
2 STATE OF GEORGIA,
3 COUNTY OF FULTON:

4 I do hereby certify that the above and
5 foregoing deposition was taken down, as stated in
6 the caption, and the questions and the answers
7 thereto were reduced to typewriting under my
8 direction.

9 I do further certify that the witness
10 was duly sworn by me, that the exhibits attached
11 are true and correct as furnished to me, and that
12 the foregoing 169 pages represent a true and
13 correct transcript of the evidence given by said
14 witness upon said hearing.

15 I do further certify that I am not of
16 kin or counsel to the parties to the case; am not
17 in the regular employ of counsel for any of said
18 parties; nor do I have any interest, financial or
19 otherwise, in the final result of said case.

20 This, the 17th day of August, 1998.

21
22
23 Carolyn J. Smith, Notary Public
24 My Commission Expires 01/04/02
25 Registered Professional Reporter
Certified Merit Reporter
Certified Shorthand Reporter
Certificate Number A-1361



BellSouth Telecommunications Ordering / Pre-ordering Integration Interface (OPII) Software

Albion International, Inc.
210 Interstate North Parkway
Suite 700
Atlanta, GA 30339
(770) 980-6753
www.albion-intl.com

Contacts

Greg Berman, Project Manager
Greg@albion-intl.com

Jack Runnels, Software Consultant
Jack@albion-intl.com



BellSouth Telecommunications Ordering / Pre-ordering Integration Interface (OPII) Software

Table of Contents

TABLE OF CONTENTS.....	1
EXECUTIVE OVERVIEW.....	1
TIME.....	1
RESOURCES.....	1
DEVELOPMENT APPROACH.....	2
Project Methodology.....	2
Requirements.....	2
Software Development.....	2
Development Environment.....	2
Documents/Information Used.....	3
WHAT THE SOFTWARE DOES.....	4
New Service—Residential.....	4
Order Processing.....	4
Administrative Information.....	7
View CSR.....	8
Software Information Flow.....	9
HTTP INTEGRATION.....	27
Validating Information – HTTP.....	27
How We Connect To BST.....	28
What Is Sent To BST.....	28
What Is Retrieved From BST.....	30
HTTP Policy Manager Source Code.....	32
SUBMITTING THE LSR ORDER.....	33
Create a Submittal File.....	33
Process Description – Creating File for PC-EDI.....	33
INTEGRATION PROCESS USING PCEDI.....	35
Overview.....	35
TLC – Steps/Process in Sending an EDI PO (850) Document.....	35

TABLE OF CONTENTS

Integrating With TLG 35
How to Import the OPII File 36
ASSIGNED CONTACTS.....37

Executive Overview

Abion International, Inc. (Abion) was contracted by BellSouth Telecommunications (BST) to prove the integration viability of the BST pre-order CGI interface and the BST orders EDI interface. Acting as a Competitive Local Exchange Carrier (CLEC), Abion wrote the Ordering / Pre-ordering Integration Interface (OPII) application that integrates internal CLEC Information Systems functions with external system functions—in this case, the BST pre-order and firm order interfaces. The OPII application, using a client-server architecture, currently has the ability to process new orders for residential service. The OPII application was developed using Forté[®] Software's Forté Application Development Environment (Forté), an n-tier, object-oriented, distributed computing environment.

Time

Abion began the OPII project on February 24, 1998 and completed the project April 30, 1998.

The total hours required to produce the OPII software was 1007.5 with a total cost of \$120,675.00. The breakdown of the hours by role within the development team were:

Title	Hours
Product Architect	12
Project Manager	158.5
Software Consultants (2)	837

Resources

The Abion – OPII development team was made up of four team members: one product architect, one project manager, and two software consultants. In the case of the OPII project, each of the aforementioned roles provide the following expertise:

Title	Description
Product Architect	Provide expertise in creating a cohesive technical application architecture to support business requirements and to meet or exceed performance requirements set forth by BellSouth Telecommunications.
Project Manager	Provide project leadership, technical mentoring to the 'team' to insure successful completion of the project within budget and the time constraints set forth by BellSouth Telecommunications.
Software Consultants (2)	Provide programming / technical expertise to design, develop and implement the OPII software to specification.

Development Approach

Project Methodology

For the OP11 software, Albion used an object-oriented, component-based 'spiral' development approach. This development approach promotes the delivery of functional software components in increments. Incremental delivery gives management the ability to constantly review the progress of the development effort throughout the development cycle. By proactively previewing the software, 'course corrections' to business and functional requirements are more easily made before the later stages of development, resulting in a shorter and less costly development cycle.

Requirements

From a business requirements perspective, BST's LENS web application was used as a model for the business requirements used in OP11. Functionally, requirements were communicated to Albion using various methods including CGI (HTML) and ANSI standard Purchase Order 850 EDI transaction specifications from BST. Additionally, Albion integrated other non-BST requirements into the software to show internal versus external integration between in-house and BST services.

Software Development

An object-oriented approach to software development was used for OP11. Class diagrams were modeled using the business requirements set forth by BST. From a coding perspective, by using Albion's 'Framework' of class libraries and components, the code development effort theoretically started at day 60 instead of day 1 thus reducing the overall development cycle time tremendously.

Development Environment

The development environment Albion used for OP11 development utilized the following hardware and software:

- Forté Software's Forté Application Development Environment
- Albion's Forté 'Framework' (Class Libraries and Components)
- Repository based development
- Microsoft NT® OS Clients and Servers
- Oracle® 7.3 RDBMS Software
- Harbinger's Trusted Link Commerce® EDI Software
- Select Software's Select OO Case Tool®

Documents/Information Used

Albion made use of documentation and information that is readily available to all CLECs via the Internet, or through a CLEC's business contact at BellSouth. These information sources included:

- LENS CGI Interface Specification Version 2.1
- LEO Implementation Guide (Volume 1)
- Local Exchange Navigation System screens and associated source code. Source code for the screens was obtained simply by using the "View Source" command from an Internet browser.

What the Software Does

New Service—Residential

The Local Exchange Navigation System (LENS) is a web-based application that was developed by BellSouth to enable CLECs to place orders. The objective of the OP11 software is to provide a fully integrated means for a CLEC to place an order (New Service—Residential) without forcing them to go through a web browser. This is accomplished by accessing the BellSouth LENS CGI server to obtain information during the Pre-Order and Firm-Order phase, and converting the completed order to an EDI document that can interface with the Harbinger PC-EDI application. The OP11 application also allows the CLEC to access its own database to integrate internal information (billing, marketing, etc.) into the ordering process. The OP11 application can be divided into three main pieces of functionality: Order Processing, Administrative Information, and View CSR.

Order Processing

This is the primary function of the application. Order Processing within OP11 allows a CLEC user to view information from the LENS system, enter customer information to generate a Local Service Request (LSR) for a New Order—Residential, and generate a file which can be submitted using Harbinger's PC-EDI software. All Order Processing begins at the Action Selection Launcher Window. From this window, a user can go to the Pre-Order and Firm Order folders. This section will describe the Action Selection Launcher, the Pre-Order Phase, and the Firm Order Phase.

Action Selection Launcher

The Action Selection Launcher is the starting point for Order Processing. The end user selects the Activity Type (e.g., New Installation), the Service Type (e.g., Residential), and the Area (e.g., GA-Atlanta). Once a user has entered this data, the steps for completing the Pre-Order phase are displayed within the window. The user then double-clicks on the Pre-Order node to launch the Pre-Order Folder. The launcher window keeps track of which steps of Order Processing have been completed with checkmarks to the side of each step. Once all required steps have been completed, the user can click the Submit button. A Purchase Order Number is assigned and displayed. Once the user has submitted an order, the OP11 application uses all the information entered by the user to generate an EDI file that can be imported into the Harbinger PC-EDI software. For more information on how the OP11 application generates an EDI order, see the section on *Submitting the LSR Order*

Pre-Order Phase

The Pre-Order folder contains tabs that allow the CLEC to validate an address and get other preliminary information prior to generating an LSR. Calls to the LENS CGI server are only made during the Pre-Order phase. Information that is gathered during the Pre-Order phase is transfer to the Generate LSR phase, eliminating the need to access LENS. For more information on how the OP11 application uses HTTP to send and receive information to/from LENS, see the section on *HTTP Integration*.

Address Validation

Unlike the LENS browser, the order of completion of windows within OP11 is not pre-determined. The Address Validation tab must be completed first, however. Information gathered on this window is used to gather information for other tabs/windows in the application. To search for a valid address, a user must enter either a telephone number or the combination of street name, city, and state. The OP11 application checks to see that key fields have been entered prior to sending a request to the LENS CGI server. This saves the user from waiting for the LENS CGI server to return an error message. Once key fields have been entered, the user can click the Validate button. This causes the data entered by the user to be sent to the CGI server. If the CGI server returns a single address, it is populated in the proper fields on the tab. If multiple addresses are returned, a list is displayed from which the user can choose. Clicking on one of the addresses causes it to be populated in the proper fields. This is in contrast to the LENS browser, which requires that the user re-enter the information into the appropriate fields. Once an address is determined to be valid and the user saves this information, the Reserve, Features, and Calendar tabs become enabled, allowing the user to continue through the rest of the Pre-Order phase.

Reserve Phone Numbers

The Reserve Phone Numbers tab functions very much the same as its counterpart in the LENS browser. The user enters the type of numbers they want along with any special conditions. When the user clicks Get Nos. the application sends a request for telephone numbers to the CGI server. The list of telephone numbers is created from the HTTP returned, then displayed in the "Available Numbers" box. A user then must select from the available numbers. This tab must be completed

Features

When a user enters the Features Tab, a call is made to the CGI server for services and features. A list of available services and features is created from the HTTP that is returned, and that list appears in the "Select Features/Services" box. The drop list of available carriers is populated from the CLEC's database, specifically from a table that contains information on carriers that have contracted with the CLEC. The "Latest Marketing News" box is populated with information on promotions that the CLEC may be running at the time the end user is filling out the order. This marketing information is updated periodically within the application.

Installation Calendar (View Only)

When a user enters the Installation Calendar Tab, a call is made to the CGI server for the Installation Calendar. The Installation Calendar is created from the HTTP that is returned from that request. At this point, the user can only view the Installation Calendar. A due date is not calculated until the user enters the Generate LSR phase.

Firm Order Phase

All sections of the Pre-Order phase must be complete before the Firm Order steps are even populated in the Launcher window. To open the Firm Order folder, a user would simply double click on the "Generate LSR" node of the Launcher window. The Firm Order folder contains tabs that relate to the generation of an LSR. Any information needed from the LENS CGI server has already been retrieved in the Pre-Order phase and transferred to this folder.

Installation Location

The Installation Location tab is similar to what a user would see accessing the "Location and Access" screen in LENS through a browser. Information can be entered regarding the end user's location, wiring option, and access to the location. The address is populated with the address that was validated in the Pre-Order phase. It is not required that this tab be completed for a user to be able to submit an order. However, a customer name must be entered either on this tab or on the Directory Information tab.

Due Date Calculation

The Installation Calendar seen on this tab is the same seen in the Installation Calendar (View Only) tab of the Pre-Order phase, except that there are fields for the user to enter a due date. The application internally verifies that the date entered by the user is valid, avoiding the need to access LENS. This tab must be completed for a user to be able to submit an order.

Directory Information

The Directory Information tab is very much the same as its counterpart in the LENS browser. The user enters the customer name, address for directory delivery, number of books to be sent, and directory listing information. The delivery address and listing address are pre-populated with the validated address from the Pre-Order phase. If the user entered and saved a customer name on the Installation Location tab, "Name" and "Listed Name" will be pre-populated with that information. This saves the user the time it would take to manually enter this information. The information pre-populated in these fields can be manually changed if directory delivery and listing information are not the same as end user billing information. It is not required that this tab be completed for a user to be able to submit an order. However, a customer name must be entered either on this tab or on the Installation Location tab.

Authorization Information

The Authorization Information tab combines input fields found on the "Administrative," "Billing," and "Contact" screens of the LENS browser. Through this tab, a user can select the billing account number, contacts, and enter a project ID. All drop lists and text boxes on this tab are populated with information from the CLEC's database, specifically the Billing and Contacts tables. This tab must be completed for a user to be able to submit an order.

Hunting Information

The Hunting Information tab is part of the Services Folder, accessible from the Installation Location Tab. It is not part of the main Firm Order Folder because it is not necessary to fill out any hunting information for a New Installation—Residential order.

Services

The Services tab is part of the Services Folder, accessible from the Installation Location Tab. It is not part of the main Firm Order Folder because it is not necessary to fill out any service information for a New Installation—Residential order. This tab is similar to the "Service Details" portion of the LENS browser.

Administrative Information

As stated earlier, the OPPI application pulls information from the CLEC's database to complete the order, and provide additional information to the end user while completing the order. In this way, the CLEC can bypass the CGI server for certain information, and marketing information can be used within the application. Additionally, EDI codes necessary for the generation of the EDI file can be stored. The OPPI application provides windows that allow the CLEC to update any information in their database that pertains to Order Processing.

Billing Maintenance

The Billing Maintenance window allows the CLEC to maintain information about each of its billing accounts. It is these accounts that are shown in the Authorization Information Tab during the Firm Order phase.

Contacts Maintenance

The Contacts Maintenance window allows the CLEC to maintain information for the three different types of contacts required for the generation of an LSP. LENS requires different information for each of the three types of contacts. For example, an address is required for an Initiator and Design/Engineering, but not for Implementation. This window therefore "morphs" to include only those fields relative to a particular contact type.

Drop List Maintenance

Some drop lists in the OPPI application, such as Activity Type and Service Type, need to have an EDI code associated with each selectable option. These EDI codes can be maintained in the Drop List Maintenance window.

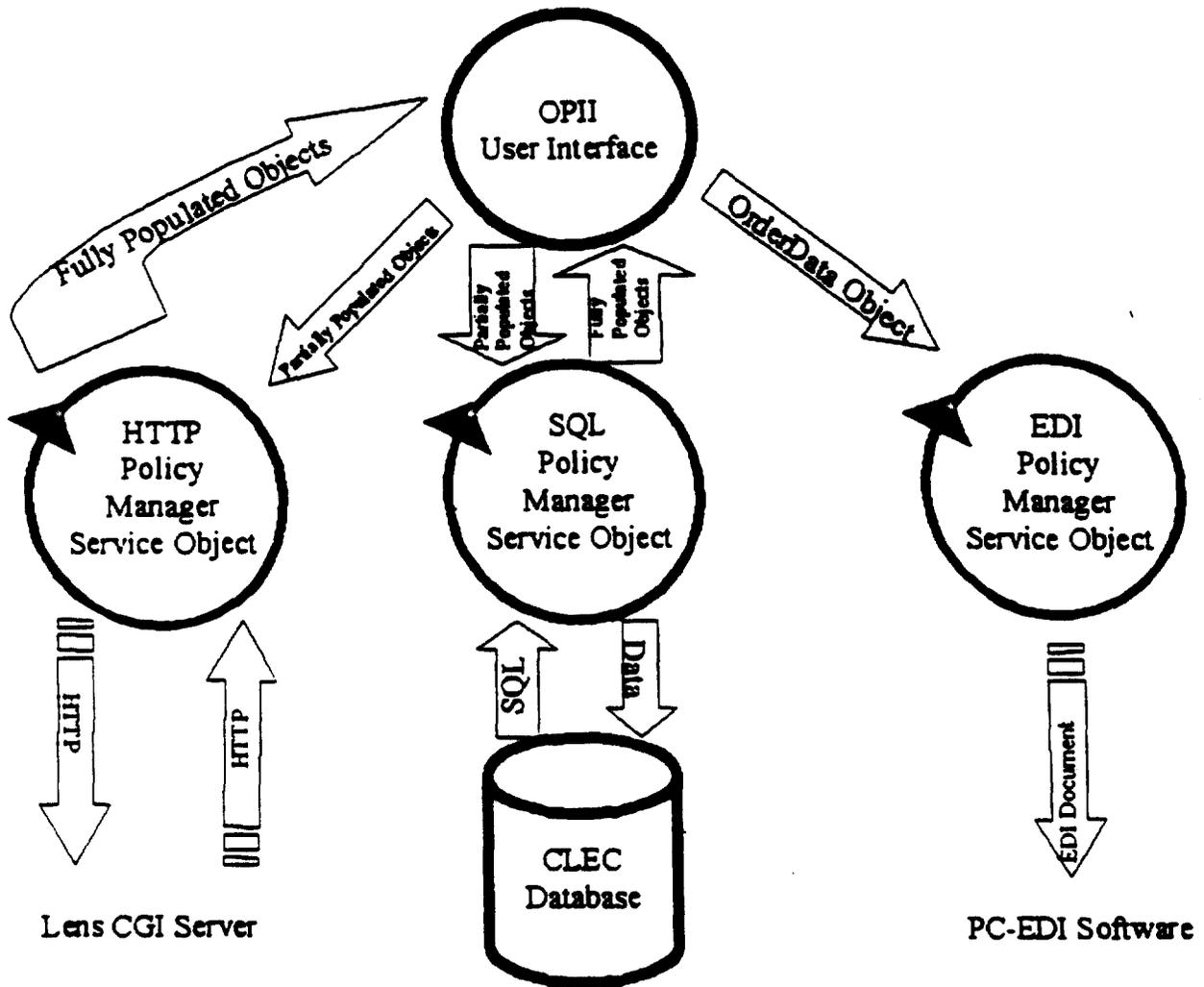
Contracted Carriers Maintenance

The Contracted Carriers Maintenance window allows the CLEC to maintain information for each long distance carrier it has contracted with. The PIC and ACNA are necessary to generate an EDI file.

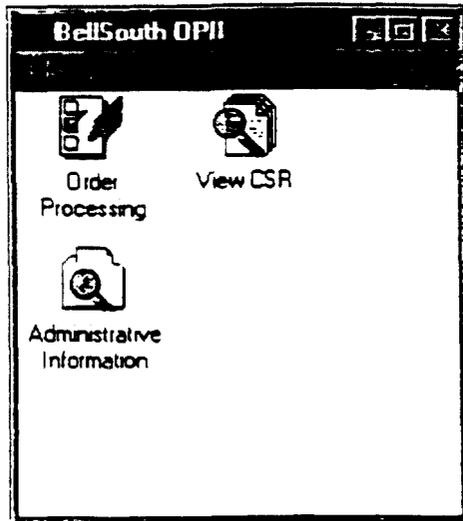
View CSR

The View CSR Window allows the CLEC to view Customer Information for a given telephone number. This window is accessible from the Main Object Group window, or during Order Processing. A user enters a telephone number and area, then presses the View CSR button. A request is sent to the LENS CGI server for the CSR. The information that is returned is parsed (broken down) and displayed in four separate areas: Directory Listing, Directory Delivery, Billing Information, and Services, Equipment, Remarks.

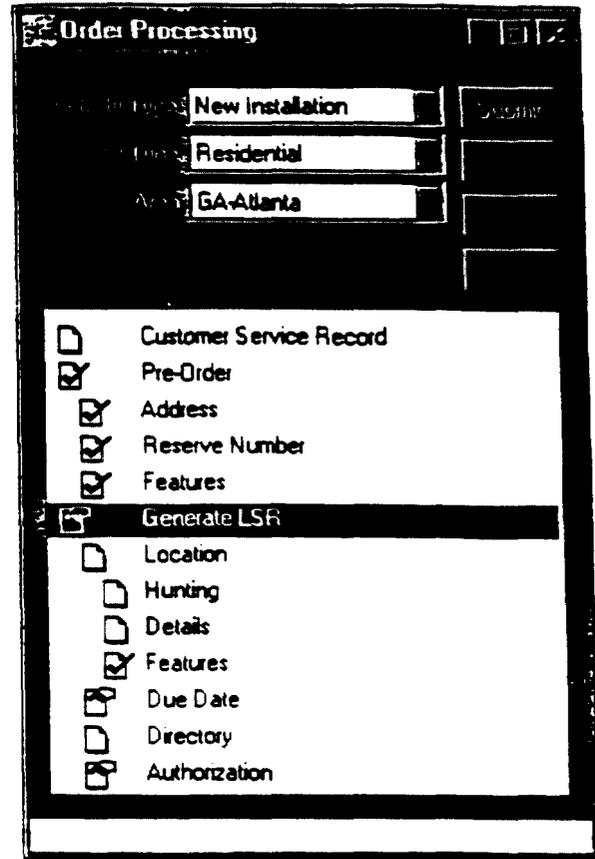
Software Information Flow



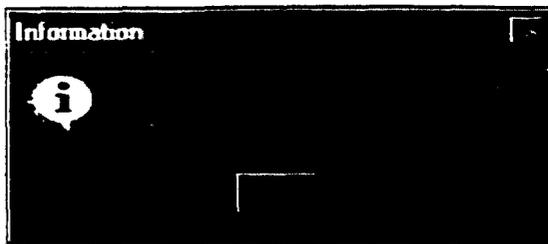
The Software



Main Object Group Window



Order Processing Launcher Window



Example of successful order submission.
Note P.O. #

Pre Order NOI

Address | Reserve | Features | Calendar

Street Number: Suffix:

Street Name:

Dir-Prefic: T/F: Dir-Suffix:

Unit:

Structure:

City:

State: Zip:

Descriptive Address:

Route: Box:

Telephone Number:

House Numbers	Street	City	State

Address Validation Tab, Pre-Order Folder