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2 For completeness, in addition to my testimony, I have three exhibits that explain and describe

3 BACE in more detail: the BACE Users Guide (Exhibit JWS – 2), the BACE Model

4 Methodology Manual as (Exhibit JWS – 3), and the BACE Model Source Code (Exhibit JWS-4).

5 I also provide the BACE Model itself on a CD (Exhibit JWS-5).

6

7



I also provide data identifying the actual competition that exists in some of the geographic markets where the FCC's triggers are not met. This data supports the conclusion of other BellSouth witnesses that CLPs are not impaired without access to BellSouth's unbundled local switching in certain markets pursuant to the FCC's "potential deployment" analysis.

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BELLSOUTH TELECOMMUNICATIONS, INC.  
DIRECT TESTIMONY OF ALPHONSO J. VARNER  
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
FILED JANUARY 9, 2004  
DOCKET NO. P-100 SUB 133Q

**FILED**  
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N.C. Utilities Commission

**EXECUTIVE SUMMARY**

My testimony presents performance data generated by measurements approved by this Commission to demonstrate BellSouth's high level of performance for UNE loops, hot cuts and collocation. This high performance level demonstrates that BellSouth's performance in these areas is not an operational barrier to UNE-Loop (UNE-L) market entry. The same PMAP process that yielded the data relied upon by this Commission and the FCC to conclude that BellSouth met its section 271 obligations produces the data provided in this filing. I provide performance results for the period October 2002 through September 2003. A detailed discussion of the performance results is contained in Exhibit AJV-1.

BellSouth provides data herein not only for measurements associated with installation of voice grade loops as defined in the "Provisioning" category of the SQM, but for measurements in the Ordering and Maintenance & Repair categories as well. These measurement results show that BellSouth responds to CLP loop orders accurately and timely and performs maintenance and repair activities in a nondiscriminatory manner.

1 Also, because UNE loops are terminated in collocation spaces, data for  
2 collocation performance are included.

3  
4 Past proceedings indicate that the CLPs typically rely on unsupported  
5 anecdotal evidence or baseless guesses about the future, rather than  
6 actual data, to allege poor performance by BellSouth. If that pattern  
7 continues in this proceeding, the Commission should disregard the CLPs'  
8 testimony and focus solely on the objective evidence of performance that I  
9 present here.

10  
11 In addition, I present some additional performance measurements for the  
12 Commission to consider. There are a few hot cut processes that are  
13 either not covered by the existing measurements or, given the anticipated  
14 volume of hot cuts if switching is no longer required, that this Commission  
15 may want to monitor more closely. BellSouth proposes to add a new Pre-  
16 Ordering measure (PO-3, *UNE Bulk Migration – Response Time*) to  
17 capture its performance in the initial stage of processing a CLP request for  
18 a batch conversion and to modify four of the Ordering measurements (O-  
19 7: Percent Rejected Service Requests; O8: Reject Interval; O9: Firm  
20 Order Confirmation Timeliness and O11: Firm Order Confirmation and  
21 Reject Response Completeness) to include project managed batch hot  
22 cuts that were previously excluded.

23  
24 Additionally, BellSouth proposes to add one new provisioning measure (P-  
25 6E, *Non-Coordinated Customer Conversions - % Completed and Notified*

1           on Due Date) to capture BellSouth's performance on non-coordinated  
2           cutovers. Finally, there is one change to the measure P-6: *Coordinated*  
3           *Customer Conversions Interval* to include the time to notify the CLP that  
4           the cutover has been completed.

5  
6           The details of these measurement additions and changes are included in  
7           Exhibit AJV-2. The new measurement, P-6E, that BellSouth proposes to  
8           add to the North Carolina SQM is also proposed as a new measurement  
9           in the SEEM plan in both Tier 1 and Tier 2, reflected in Exhibit AJV-3.

10  
11           In summary, BellSouth's loop provisioning performance, as provided  
12           herein, firmly demonstrates that CLPs do not face operational barriers to  
13           UNE Loop market entry. Further, BellSouth has proposed to provide the  
14           Commission with even more monitoring capabilities if local switching is  
15           eliminated as a UNE through the recommended changes to the existing  
16           SQM included in this filing.

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REBUTTAL MATRIX SUMMARY OF POSITIONS  
DOCKET NO. P-100, SUB 133q**

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<b>WITNESS</b>	<b>SUBJECT MATTER OF TESTIMONY</b>	<b>TRO DECISIONAL CRITERIA</b>
Kenneth L. Ainsworth	Hot cut processes	47 C.F. R. §51.319(d)(2)(ii)
Dr. Debra J. Aron	Potential deployment test	47 C.F. R. §51.319(d)(2)(iii)(B)
Eric Fogle	Hot cut processes	47 C.F. R. §51.319(d)(2)(ii)
A. Wayne Gray	Potential deployment test	47 C.F. R. §51.319(d)(2)(iii)(B)
Alfred A. Heartley	Hot cut processes	47 C.F. R. §51.319(d)(2)(ii)
Milton McElroy	Hot cut processes	47 C.F. R. §51.319(d)(2)(ii)
W. Keith Milner	Potential deployment test	47 C.F. R. §51.319(d)(2)(iii)(B)(3)
Ronald M. Pate	Hot cut processes	47 C.F. R. §51.319(d)(2)(ii)
Dr. Christopher Pleatsikas	Geographic market area	47 C.F. R. §51.319(d)(2)(i)
John A. Ruscilli	Policy issues	47 C.F.R. §51.319(d)(2)(i), (ii), and (iii)
James W. Stegeman	Economic Model – BellSouth's Analysis of Competitive Entry ("BACE")	47 C.F. R. §51.319(d)(2)(iii)(B)
Gary Tennyson	Hot cut processes	47 C.F. R. §51.319(d)(2)(ii)
Alphonso J. Varner	Hot cut processes Potential deployment test	47 C.F. R. §51.319(d)(2)(ii) 47 C.F.R. §51.319(d)(2)(iii)(B)

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BELLSOUTH TELECOMMUNICATIONS, INC.  
EXECUTIVE SUMMARY  
REBUTAL TESTIMONY OF KENNETH L. AINSWORTH  
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. P-100, SUB 133Q  
FEBRUARY 16, 2004

In my rebuttal testimony, I respond to portions of the direct testimonies of Mr. James D. Webber and Ms. Sherry Lichtenberg on behalf of MCI, and Mr. Mark David Van de Water on behalf of AT&T with regard to BellSouth's hot cut processes. My rebuttal testimony begins by addressing the Competing Local Providers' ("CLPs") allegations regarding BellSouth's hot cut process. The CLPs generally complain about six (6) aspects of the process, each of which BellSouth has addressed: (1) Go Ahead Notifications, (2) Database impacts, (3) After hours cuts, (4) Provision of all end user lines on same day, (5) Exclusion of certain loop types, and (6) CLP-to-CLP migrations.

Next, I will also respond to CLPs' allegations concerning BellSouth's hot cut performance as to service disruptions during conversion and CLPs' erroneous claims that BellSouth's hot cut process often results in errors and delays. I emphasize that while BellSouth might, through the hot cut process, cause service disruption, the CLP has significant responsibility to ensure minimal service disruption and BellSouth is not and cannot be responsible for a CLP's actions or inactions regarding the hot cut process.

I discuss the issue of scalability and point out that if this Commission were to reach a

1 finding that CLPs are not impaired without unbundled local switching, the conversion of  
2 the CLPs' embedded base of customers served by UNE-P would not commence until  
3 August 2005 (over a year and a half from the time this testimony is filed) and then would  
4 be migrated to the CLPs' own switches over a 21 month transition period as set out by  
5 the FCC in its *Triennial Review Order*. Thus, BellSouth has a year and a half to get  
6 ready for something that will occur over an almost two-year period. Based on a "worst  
7 case scenario" I concluded that BellSouth could accommodate the volumes of hot cuts  
8 resultant from such an outcome.

9

10 Other areas of concern that I respond to include the fact that Integrated Digital Loop  
11 Carrier ("IDLC") lines are available to be cut via the hot cut process and that the manual  
12 hot cut process is capable of sustaining volumes necessary to support Unbundled  
13 Network Element Loop ("UNE-L").

14

15 Finally, I point out that BellSouth has always stated that it was willing to consider  
16 specific process changes proposed by the CLPs. In an effort to be responsive,  
17 BellSouth has agreed to make specific enhancements to its already-compliant Batch  
18 Hot Cut Process, which should address virtually all of the CLPs' alleged criticisms of the  
19 process.

20

21 This concludes my summary.

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**BELLSOUTH TELECOMMUNICATIONS, INC.**  
**BEFORE THE**  
**NORTH CAROLINA UTILITIES COMMISSION**  
**DOCKET NO. P-100, Sub 133q**  
**SUMMARY OF THE REBUTTAL TESTIMONY OF**  
**DR. DEBRA J. ARON**

My rebuttal testimony responds to the economic arguments made by Dr. Mark T. Bryant on behalf of MCI, Mr. Steven E. Turner on behalf of AT&T, Mr. Don J. Wood, also on behalf of AT&T, and Mr. Joseph Gillan on behalf of CompSouth.

Several of the witnesses seek to re-write, or at least have the Commission ignore, the requirements of the TRO. For example, witnesses Gillan and Wood argue that the “potential deployment” analysis should not be used to assess impairment, as the FCC directs, but instead, that its use should be limited merely to an assessment of why impairment exists—as though impairment were a foregone conclusion. The Commission should reject such undisciplined advocacy. Mr. Gillan also argues that substantial numbers of lines are served by UNE-P and are therefore “dependent on” UNE-P. Of course, such a statement simply presumes the outcome of an impairment analysis that the FCC requires states to perform. Although CLPs currently may, in fact, use UNE-P rather than UNE-L to serve many of their customers, presumably reflects the relative profitability of the alternatives, but does not imply that using UNE-L is not economic. Thus, an argument such as Mr.

1 Gillan's is meaningless for our purposes. Indeed, the fact that relative profitability  
2 (as well as feasibility) drives the CLP provisioning decision is one of the economic  
3 reasons underlying the need for a potential deployment test.

4  
5 Dr. Bryant similarly paints an unwarranted and dark picture of a world without  
6 UNE-P. For example, Dr. Bryant (incorrectly) claims that a finding of "no  
7 impairment" means that UNE-P competition will be "terminated." This is not true.  
8 A finding of "no impairment" would mean that CLPs could obtain switching from  
9 BellSouth at commercial prices, or that CLPs can elect to compete using UNE-L.

10  
11 Both Dr. Bryant and Mr. Turner claim to present models that assess impairment.  
12 However, although Dr. Bryant discusses a model that was originally created by the  
13 National Regulatory Research Institute (NRRI), he does not actually provide it in  
14 North Carolina. It is therefore impossible to fully evaluate the "impairment tool"  
15 that Dr. Bryant advocates. Mr. Turner submits a model, but his does not comply  
16 with the FCC's requirements. The FCC requires that the Commission conduct a  
17 *business case* analysis, which the FCC describes as accounting for the revenues and  
18 costs of an efficient CLP entering a market using the most efficient business model.  
19 Mr. Turner's model completely ignores revenues. Instead, it focuses on the costs  
20 that he says a CLP would face, and which (he claims) would exceed the costs  
21 incurred by an ILEC. Mr. Turner's "cost disadvantage" approach was addressed,  
22 and explicitly rejected, by the FCC. The FCC properly concluded that a "cost  
23 disadvantage" analysis does not properly address the central issue of "impairment"

1 because it does not address whether an efficient CLP economically could enter a  
2 market without access to the unbundled element. Mr. Turner's model is fatally  
3 flawed at the conceptual level and is invalid for use in determining impairment  
4 under the FCC's TRO.

5  
6 Dr. Bryant also presents several flawed parameter estimates, including revenue,  
7 customer acquisition costs, churn, and market share. Dr. Bryant notes that his  
8 revenue estimate is based on national data. He does not appear to try to conform  
9 his estimate to North Carolina or make any granular adjustments to this national  
10 figure that might make the estimate more applicable to this case. Moreover, and  
11 inexplicably, Dr. Bryant's own evidence shows that his revenue estimate is too low.  
12 In fact, his proposal is lower than one of the MCI plan prices that he points to as  
13 support for his estimate and MCI provides higher-priced plans as well. MCI's plan  
14 prices presumably would be available to the efficient CLP seeking to enter the  
15 market.

16  
17 Dr. Bryant also claims that acquisition costs for an efficient CLP are \$130 per  
18 customer. The basis of this estimate, according to Dr. Bryant's response to  
19 discovery in Florida is, in part, provided by the experiences of wireless telephone  
20 companies. As is well-known, wireless companies often underwrite the  
21 consumer's cost of the handset, thereby invalidating the indiscriminate, and  
22 unadjusted, use of wireless data for this purpose (and Dr. Bryant never mentions  
23 making any such accommodations). Moreover, Dr. Bryant's customer acquisition

1 cost estimate is inconsistent with the churn rate he recommends. He assumes that  
2 customers stay with the CLP for 12 months. This implies a customer life of about  
3 half of what wireless companies experience. In other words, wireless firms may be  
4 able to spend more to acquire a customer because they expect to keep their  
5 customers longer than does the CLP modeled by Dr. Bryant. Moreover, the churn  
6 rate that Dr. Bryant recommends for the "efficient" CLP (of approximately 10  
7 percent per month) is over twice as high, in some cases, as published estimates for  
8 *existing* CLPs.

9  
10 I also demonstrate that Dr. Bryant's 12-month churn assumption implies a monthly  
11 amortization of customer acquisition costs of about \$11 (i.e., \$130 / 12 months),  
12 but that an *actual* CLP (Talk America) has had an implied customer acquisition  
13 amortization cost on the order of \$5 per month. It is inappropriate to assume that  
14 an *efficient* CLP would have amortized acquisition costs over twice as high as what  
15 this real-world CLP has been able to achieve.

16  
17 Finally, Dr. Bryant claims that the efficient CLP executing the most efficient  
18 business model will have a market share of five percent. This is simply  
19 inconsistent with the experience that has been seen in other markets (as, for  
20 example, the successes enjoyed by (e.g.) cable companies that have pursued  
21 telephone service).

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BELLSOUTH TELECOMMUNICATIONS, INC.  
EXECUTIVE SUMMARY OF ERIC FOGLE  
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. P-100, SUB 133Q  
FEBRUARY 16, 2004

The purpose of my testimony is to rebut the direct testimony of Mr. Van de Water and Mr. Bradbury on behalf of AT&T Communications of the Southern States, LLC ("AT&T"), and Ms. Lichtenberg on behalf of MCI WorldCom Communications, Inc. and MCIMetro Access Transmission Services, Inc. ("MCI") by demonstrating that BellSouth has in place a hot cut process for loops that involves Line Sharing and Line Splitting xDSL services during UNE-P to UNE-L migrations. My testimony also demonstrates, contrary to any suggestion of Ms. Lichtenberg, that BellSouth has voluntarily involved the Competitive Local Provider ("CLP") community in the development of this process.

Even though not required by the Triennial Review Order ("TRO"), BellSouth already has in place the needed processes to handle all known CLP requested migration scenarios. In particular, if the CLP owns the splitter, as it is obligated to do, the CLP can cut a loop from the BellSouth switch port to a CLP switch port using its own processes without interruption to the DSL service. In addition, with less than 0.8% of all CLP owned lines involved in line splitting or line sharing, my testimony will demonstrate that CLPs are not harmed in any way with a conversion of Line Splitting via UNE Loop, UNE Port and cross connects to a UNE-L.

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BELLSOUTH TELECOMMUNICATIONS, INC.  
EXECUTIVE SUMMARY  
REBUTTAL TESTIMONY OF A. WAYNE GRAY  
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. P-100, SUB 133Q  
FEBRUARY 16, 2004

In my rebuttal testimony, I respond to the direct testimonies of Mr. Jay M. Bradbury and Mr. Mark David Van De Water on behalf of AT&T Communications of the Southern States, LLC. ("AT&T") and Mr. James D. Webber on behalf of MCI/metro Access Transmission Services, LLC and MCI WORLDCOM Communications, Inc. ("MCI"), as to their speculations that Competing Local Providers ("CLPs") may be impaired from serving their mass market customers as facilities-based providers due to a lack of available Incumbent Local Exchange Carrier ("ILEC") collocation space in any mass markets in North Carolina.

I point out that collocation space is currently available in all of BellSouth's central offices in North Carolina, except one (the Charlotte – Old Dowd central office). The fact that these CLPs (and others) have chosen not to collocate in all of the BellSouth central offices that serve their UNE-P (unbundled loop and port) customers is irrelevant in the context of this proceeding. CLPs have had, and will continue to have, little incentive to collocate their equipment in BellSouth's central offices or request enhanced extended loops ("EELS"), as long as BellSouth is required to provide unbundled local switching.

1 I also address the CLPs' concerns regarding the timeliness of provisioning collocation  
2 space in accordance with Commission-approved performance measurements, the  
3 applicability of BellSouth's collocation rates approved by this Commission, the ability of  
4 CLPs to access their collocation arrangements pursuant to the terms and conditions  
5 contained in their interconnection agreements, and BellSouth's excellent results with  
6 respect to the collocation performance measurements adopted by this Commission.

7

8 In addition, my testimony discusses alternatives to collocation, such as EELs, assembly  
9 points and co-carrier cross connections, which can be used to migrate existing UNE-P  
10 mass market customers to UNE-L (unbundled loops).

11

12 I also clarify BellSouth's obligations, pursuant to the FCC's Rules, regarding the  
13 provisioning of co-carrier cross-connections ("CCXCs") between two different CLPs  
14 collocated in the same central office, and describe BellSouth's new CCXC tariff offering  
15 in BellSouth's FCC Tariff No. 1, which is now available for ordering by the CLPs.

16

17 Finally, I explain clearly what AT&T's issue is in regard to the use of multiple company  
18 codes for ordering DS0 loops into collocation sites with different Access Customer  
19 Name Abbreviations ("ACNAs"), that have been acquired by AT&T, but never  
20 transitioned to AT&T's "ATX" ACNA. I also describe BellSouth's policy of rejecting DS0  
21 assignments from CLPs, that do not own the collocation space, to ensure that the CLP's  
22 assets/property are properly protected from unauthorized assignments, and the means  
23 by which CLPs may order wholesale switching from other CLPs.

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25 This concludes my summary.

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BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL EXECUTIVE SUMMARY OF ALFRED A. HEARTLEY  
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

FEBRUARY 16, 2004

My name is Alfred A. Heartley and my business address is 754 Peachtree Street, Atlanta, Georgia 30308. My title is General Manager - Wholesale Performance and Regional Centers. I graduated from North Carolina State University in 1971 with a BS Degree in Applied Mathematics. I have over 32 years experience in the telecommunications industry working for BellSouth.

The Purpose of my rebuttal testimony is to respond to portions of the direct testimonies of Mr. James D. Webber on behalf of MCI and Mr. Mark David Van de Water on behalf of AT&T regarding the batch hot cut process.

Mr. Webber describes what he calls "the potentially chaotic situation" that could result when multiple technicians work on the main distributing frame(MDF). BellSouth has determined the number of technicians that can work simultaneously on a MDF. BellSouth intends to schedule the appropriate number of technicians of different shifts over a 24-hour period to prevent a "chaotic situation" on the MDF.

1 Mr. Van de Water extrapolates some technician work times in his  
2 direct testimony in an effort to show that BellSouth cannot  
3 handle anticipated volumes of UNE-P to UNE-L conversions and  
4 UNE-L growth to create meaningful UNE competition. My rebuttal  
5 testimony addresses the UNE volumes that BellSouth can handle  
6 based on projections in BellSouth's "worst-case" force model. I  
7 also address unmanned central offices and how BellSouth will  
8 work the UNE load in these offices as well as the dispatches  
9 required when integrated digital loop carrier (IDLC) is involved  
10 in a hot cut.

11

12 In summary, BellSouth Network Services will address any concerns  
13 that the CLPs have regarding our ability to handle the hot cut  
14 process.

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BELLSOUTH TELECOMMUNICATIONS, INC.  
EXECUTIVE SUMMARY OF MILTON MCELROY JR. /  
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. P-100, SUB 133Q  
FEBRUARY 16, 2004

The purpose of my testimony is to demonstrate that BellSouth's Batch Migration Process of Unbundled Network Element Platform ("UNE-P") service to unbundled loop ("UNE-L") service is both seamless and effective as required by the Triennial Review Order (TRO), as well as describe how BellSouth's Mass Migration process exceeds the requirements of the TRO.

Through the testing conducted by PwC, BellSouth has demonstrated that its Bulk Migration Process of UNE-P service to UNE-L service is both seamless and effective. The test corroborates the testimony of BellSouth's witness, Mr. Ken Ainsworth, that BellSouth provides a proven, seamless, high quality individual hot cut process to handle the UNE-L volumes that would likely result if BellSouth were to obtain full relief from unbundled circuit switching; and that BellSouth provides a batch hot cut process that offers additional ordering and provisioning efficiencies to enhance the same proven, seamless, quality migrations that are currently associated with individual hot cuts. This process will sufficiently support the batch conversion of a Competitive Local Provider's ("CLP's") embedded UNE-P customer base to UNE-L services.

Additionally, BellSouth has developed yet another efficient batch process option to speed the conversion from UNE-P to UNE-L as required by the TRO. The Mass

1 Migration Conversion Process has been developed with a specific purpose – to convert  
2 large numbers of CLP UNE-P facilities to CLP switching with minimal CLP involvement  
3 in the individual cutovers. To that end, the Mass Migration process is designed for  
4 UNE Zones cut by Component Economic Areas where relief for switching is granted.  
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BELLSOUTH TELECOMMUNICATIONS, INC.  
EXECUTIVE SUMMARY  
REBUTTAL TESTIMONY OF W. KEITH MILNER  
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. P-100, SUB 133Q  
February 16, 2004

In my rebuttal testimony, I respond to the direct testimonies of Mr. Jay M. Bradbury and Mr. Steven E. Turner on behalf of AT&T Communications of the Southern States, LLC. ("AT&T"), as to their characterizations that Competing Local Providers ("CLPs") are impaired from entering the market as a facilities-based provider due to the inefficient Incumbent Local Exchange Carrier's ("ILEC's") network architecture.

I point out that during recent proceedings regarding the CLPs' eligibility for reciprocal compensation for tandem switching, CLPs uniformly argued that: (1) their switches covered very large stretches of geography; and (2) the CLP's architecture of choice featuring fewer switches and shorter loops as compared to incumbents' networks yielded significant benefits and that it is somewhat ironic that the network characteristic that these CLPs touted as advantageous in order to obtain greater compensation from BellSouth now suddenly constitutes grounds for CLP claims of "impairment."

In addition, I also refute allegations surrounding issues such as Integrated Digital Loop Carrier ("IDLC"), Digital subscriber Line ("DSL"), and collocation requirements.

Finally, I will respond to the flawed cost study done by AT&T implying that in the

1 absence of unbundled local switching, CLPs face practically insurmountable cost  
2 disadvantages relative to the ILECs if Unbundled Network Element Loops ("UNE-Ls")  
3 used in conjunction with their own (or a third party provider's) switching is the sole  
4 option for providing local services to mass market customers. In summary, once  
5 corrections are made to the assumptions used by AT&T, any cost "disadvantage" is  
6 much smaller than AT&T anticipated and thus does not impair a CLP's ability to  
7 compete.

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9 This concludes my summary.

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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. P-100, SUB 133Q  
Executive Summary of the Rebuttal Testimony of Ronald M. Pate  
of BellSouth Telecommunications, Inc., filed on February 16, 2004

My rebuttal testimony addresses certain issues contained in the direct testimony filed on January 9, 2004, by Mark David Van de Water of AT&T Communications of the Southern States, LLC ("AT&T") and Sherry Lichtenberg of MCI WorldCom and MCI Metro ("MCI"). I address the following points related to the ordering of batch migrations, flow-through, the LFACS database, local number portability, and CLP-to-CLP migrations:

- My testimony explains that BellSouth implemented the change request for UNE-to-UNE batch migration as AT&T requested: a batch electronic ordering process with project-managed provisioning. When the process was implemented it provided for either coordinated or non-coordinated hot cuts, rather than AT&T's suggestion that BellSouth provision the cuts during the weekends. Nevertheless, BellSouth has agreed to add Saturday cutovers. Thus, AT&T's complaint is now moot.
- My testimony explains that although it has not agreed to establish a formal collaborative at this juncture, because of the CLPs' the position on the manual provisioning of hot cuts, BellSouth has welcomed specific proposals for changes and improvements to this or any other process that would benefit the CLPs and BellSouth. Despite the fact that the CLPs have not yet submitted any such change requests through the CCP, BellSouth has agreed to incorporate many changes, based on what it has heard during various workshops, into its already seamless and effective process for batch migrations.
- My testimony rebuts AT&T's and MCI's claims that BellSouth's flow-through performance is deficient, and that its systems cannot handle increased volume.

1 BellSouth's flow-through has improved steadily since 2002, when its last 271 application  
2 was approved, most strongly for residence resale and UNE-P. BellSouth has initiatives  
3 underway to improve flow-through for the other segments, such as LNP. As a result,  
4 BellSouth is already seeing improvement to the flow-through rate for LNP. Further,  
5 commercial volume demonstrates that BellSouth has scaled its electronic ordering OSS to  
6 meet current demands.

7 • My testimony corrects AT&T's mischaracterization of the data provided by BellSouth in  
8 responses to interrogatories served earlier on BellSouth. AT&T's requested that  
9 BellSouth provide the percent of migration orders (LSRs that converted service to UNE-  
10 L and UNE-P) that were fully mechanized as compared to the total number of LSRs  
11 submitted – including both electronic and manual submissions. AT&T did not ask for  
12 flow-through percentages, and BellSouth was very clear in its responses as to what the  
13 numbers did and did not represent, and the numbers did not represent flow-through.

14 • My testimony rebuts MCI's allegations that BellSouth's loop makeup databases contain  
15 inaccurate data and should be audited. The LFACS database is also the primary source of  
16 BellSouth's loop data. Any inaccuracies negatively affect BellSouth equally.  
17 Consequently, it is in BellSouth's best interest to ensure that LFACS remains very  
18 accurate. Inaccuracies, when they do occur, are typically associated with detailed loop  
19 makeup data, not assignment data. BellSouth is continuously updating and/or populating  
20 loop makeup data in LFACS, thus improving LFACS database on a daily basis.

21 • My testimony explains that BellSouth allows CLPs to reserve spare copper facilities  
22 when migrating customers, despite comments by MCI. Using the manual or mechanized  
23 loop makeup process, CLPs have the option to search for spare pairs without reserving  
24 them or to search for spare pairs and simultaneously reserve the facilities, if available.  
25 BellSouth returns a facility reservation number during the loop makeup transaction,

1           which the CLP places on the local service request. Thus, CLPs are able to determine not  
2           only that spare facilities exist, but that spare qualified facilities exist, before issuing the  
3           LSR.

- 4           • My testimony explains that there is no basis for MCI's concern regarding the NPAC's  
5           ability to handle the volumes of number portability transactions that would occur in a  
6           market based on UNE loops. NeuStar is the administrator of NPAC, not BellSouth.  
7           NeuStar is contractually obligated to handle industry-wide portability volumes regardless  
8           of the product. The NPAC has successfully met the increased transaction demand from  
9           BellSouth, which supports NeuStar by providing forecast information.
- 10          • My testimony will demonstrate that AT&T's and MCI's issues related to CLP-to-CLP  
11          migrations have nothing to do with BellSouth's already seamless and effective hot cut  
12          process. Rather, they are issues related to the CLPs' transactions with each other, and  
13          their apparent inability to cooperate with each other. After a CLP has established service  
14          to an end user with UNE-L, the CLP maintains its own records. Consequently, the CLPs  
15          should be sharing such information with each other, using fully-integratable, machine-to-  
16          machine electronic interfaces.
- 17          • My testimony discusses that two collaboratives are already appropriately handling CLP-  
18          to CLP issues. The "end user migration" collaborative is part of the Telecommunications  
19          Competitive Interests Forum under the auspices of the Florida Public Service  
20          Commission. The participants plan to use the rules established in Florida as guidelines  
21          for establishing rules throughout BellSouth's region. Also, the Ordering and Billing  
22          Forum, the industry standards organization, is holding a multi-provider collaborative.