BOULT ▪ CUMMINGS
CONNERS ▪ BERRY PLC

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@bccb.com

REGULA...

`01 JUL 16 PM 4 3?

C....
EXECUTI.. ....

July 16, 2001

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

> Re: Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.
> Docket No. 01-00193

Dear David:

Please find enclosed the original and thirteen copies of the Testimony of Rodney Page on behalf of Access Integrated Networks, Inc. in the above-captioned proceeding.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____
Henry Walker

HW/nl
Attachment
c: Parties

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

IN RE: DOCKET TO ESTABLISH GENERIC PERFORMANCE
MEASURES, BENCHMARKS AND ENFORCEMENT
MECHANISMS FOR BELLSOUTH TELECOMMUNICATIONS,
INC.
DOCKET NO. 01-00193

**TESTIMONY OF RODNEY PAGE OF
ACCESS INTEGRATED NETWORKS, INC.**

JULY 16, 2001

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: *Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

TESTIMONY OF RODNEY PAGE

---

1 **Q.** **PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.**

2 **A.** My name is Rodney Page. My business address is Access Integrated Networks, Suite

3   101, 4885 Riverside Drive, Macon, Georgia, 31210, Main number: 478-475-9800, FAX:

4   478-476-7997, E-mail: rodney.page@accesscomm.com

5

6 **Q.** **WHAT IS ACCESS INTEGRATED NETWORKS?**

7 **A.** Access Integrated Networks, Inc. (Access) is a provider of telecommunications service to

8   small business customers in the southeast. Founded in Macon, Georgia in 1996, the

9   company is certified in the 9 states in the BellSouth region. Access provides local service

10   via the UNE-P product as provided in its Interconnection Agreement with BellSouth.

11

12 **Q.** **WHAT IS YOUR POSITION WITH ACCESS?**

13 **A.** I am Vice President-Marketing and Strategic Development. A portion of my

14   responsibilities includes the development of the Regulatory function of the business with

15   the general objective of monitoring pertinent federal/state regulatory issues that impact

16   the company's ability to achieve its business plan. I have over 30 years of experience in

17   the telecommunications industry, including 21 years with BellSouth and 7 years as

18   president of my own consulting firm, all prior to joining Access in July 1999.

19

1 Q. **WHAT IS ACCESS' INTEREST IN BELLSOUTH'S PROPOSED**
2   **PERFORMANCE MEASURES?**
3 A. With approximately 57,000 lines currently in place (4,200 +/- in Tennessee) the company
4   has had extensive experience in other BellSouth states (primarily Georgia) in ordering
5   and provisioning the UNE-P product. As we expand in Tennessee, we are very interested
6   in ensuring that BellSouth's performance measures adequately reflect that company's
7   competence in supporting CLECs' operations, specifically, the UNE-P product. Access
8   has recently become active in the regulatory arena and supports the initiatives of other
9   CLECs to insure appropriate performance measures and remedies are developed and
10   enforced.

11

12 Q. **ARE PERFORMANCE MEASURES IMPORTANT TO A NEW ENTRANT**
13   **STARTING IN THE TELECOMMUNICATIONS BUSINESS IN TENNESSEE**
14   **AND ELSEWHERE?**
15 A. Yes. Any service provider, particularly a small startup, is dependent upon its
16   reputation in the marketplace. Prospective customers have natural reservations about
17   switching from the incumbent carrier, and our company's business relationship with
18   customers is particularly vulnerable at the time of conversion. Operational problems that
19   cause a disruption of customers' service at the time of conversion severely jeopardize the
20   customers' confidence in Access as well as that of our sales agents. In 2000 and 2001,
21   we experienced problems with BellSouth that notably impacted Access' ability to market
22   its products. The only way to avoid these types of problems is to have measures in place
23   to ensure that the incumbent is treating the CLEC fairly.

24

25

26

27

28

1   Q.   **WHAT TYPES OF OPERATIONAL DIFFICULTIES HAS ACCESS**

2   **EXPERIENCED WITH BELLSOUTH?**

3   A.   We have encountered problems with BellSouth in OSS responsiveness, and UNE-P

4   specific provisioning issues such as: Coordination of disconnect ("D") and new ("N")

5   Orders, Reassignment or Loss of Facilities, Loss of Customer's features, and Problem

6   Resolution.

7

8   Q.   **WHAT DO YOU MEAN WHEN YOU SAY THAT YOU HAVE HAD TROUBLE**

9   **WITH OSS RESPONSIVENESS?**

10   A.   Access places orders to BellSouth via LENS, the electronic preorder and order interface

11   developed by BellSouth and Robotag, a BellSouth proprietary TAG front-end interface.

12   These interfaces utilize TAG, BellSouth's electronic gateway for all electronic order

13   processing. The TAG interface must be working in order for LENS/Robotag to function.

14   CLECs like Access are completely reliant on BellSouth and these systems because, as a

15   UNE-P provider, all the components of the end-users' service are provided by BellSouth.

16   However, there have been numerous BellSouth system problems related to TAG.

17   Several due dates for the 'fixes' to TAG have been promised, the latest implemented in

18   November, 2000. However, we continue to experience reliability problems with TAG,

19   including some after the November 'fix'. Specifically, we experienced TAG-related

20   outages on the following days:

21   • *November 1, 2000*
22   • *November 6, 2000*
23   • *November 9, 2000*
24   • *November 14, 2000*
25   • *November 15, 2000*

1	•	*Week of November 18, 2000*
2	•	*December 18, 2000*
3	•	*December 20, 2000*
4	•	*December 21, 2000*
5	•	*January 15, 2001*
6	•	*January 16, 2001*
7	•	*January 17, 2001*
8	•	*January 24, 2001*
9	•	*January 29, 2001*
10	•	*February 2, 2001*
11	•	*February 8, 2001*
12	•	*February 9, 2001*
13	•	*February 13, 2001*
14	•	*February 14, 2001*
15	•	*February 15, 2001*
16	•	*February 19, 2001*
17	•	*February 23, 2001*
18	•	*February 26, 2001*
19	•	*March 1, 2001*
20	•	*March 2, 2001*
21	•	*March 8, 2001*
22	•	*March 13, 2001*
23	•	*March 19, 2001*
24	•	*March 20, 2001*
25	•	*March 22, 2001*
26	•	*March 26, 2001*
27	•	*March 27, 2001*
28	•	*March 28, 2001*
29	•	*March 29, 2001*
30	•	*April 2, 2001*
31	•	*April 3, 2001*
32	•	*April 5, 2001*
33	•	*April 6, 2001*
34	•	*April 9, 2001*
35	•	*April 13, 2001*
36	•	*April 14, 2001*
37	•	*April 18, 2001*
38	•	*April 24, 2001*
39	•	*April 25, 2001*
40	•	*April 26, 2001*
41	•	*May 1, 2001*
42	•	*May 7, 2001*
43	•	*May 9, 2001*
44	•	*May 21, 2001*
45	•	*May 24, 2001*

1		• *May 25, 2001*
2		• *June 5, 2001*
3		• *June 6, 2001*
4		• *June 8, 2001*
5		• *June 11, 2001*
6		• *June 12, 2001*
7		• *June 13, 2001*
8		• *June 14, 2001*
9		• *June 18, 2001*
10		• *June 19, 2001*
11		• *June 20, 2001*
12		• *June 21, 2001*
13		• *July 2, 2001*
14		• *July 3, 2001*
15		• *July 5, 2001*

16

17 The duration of these outages varies widely, but all have been extremely disruptive and inhibited

18 the company from both converting new customers and supporting existing customers. As a

19 UNE-P provider, Access is completely dependent on the reliability of BellSouth systems.

20 Outages, such as those described above, completely debilitate the company. Much of the

21 conversion order entry as well as add/move/change activity of its installed base comes to a

22 complete halt. These types of problems in the BellSouth system cause backlogs in our service,

23 and impair our ability to provide the exceptional customer satisfaction that is the hallmark of our

24 company. These problems impact Access' ability to provide service in all of its markets.

25

26 **Q.   PLEASE TELL THE AUTHORITY ABOUT THE UNE-P SPECIFIC**

27 **PROVISIONING ISSUES ACCESS HAS EXPERIENCED WITH BELLSOUTH.**

1   A.   The process of converting an end-user customer from BellSouth retail to UNE-P is very

2   complex.   Unlike 'resale' where little changes on the customer's account other than

3   moving it from BellSouth's retail billing system to its wholesale equivalent, the UNE-P

4   conversion process literally consists of 2 separate work orders:

5   _   "D" (disconnect) order: disconnects the customer's BellSouth retail account.
6
7   _   "N" (New) order: reestablishes the account as UNE-P, billed to Access.
8
9
10   According to BellSouth, this is required due to the fact that the customer's BellSouth

11   retail account is usually 'flat rate' and the UNE-P product is 'usage based.' However, the

12   process is wrought with opportunities for severe failures.

13

14   Q.   **WHAT   TYPES   OF   FAILURES   HAVE   YOU   EXPERIENCED   WITH**

15   **BELLSOUTH?**

16   A.   A common problem is that the "D" and "N" Orders are not worked at the same time.

17   BellSouth's systems are supposed to 'relate' the separate orders. However, at times this

18   does not occur. The "D" is worked and the "N" isn't. As a result, the customer's service

19   is disconnected completely. When this occurs, the customer assumes the disconnect was

20   Access' fault.

21

22   Q.   **ARE THESE THE ONLY D&N PROBLEMS THAT YOU HAVE EXPERIENCED**

23   **WITH BELLSOUTH?**

24   A.   No. Another problem we encounter is a loss of the customer's features. Unless Access

25   requests otherwise, the D&N process is supposed to convert the customer 'as is'. That is

1   to say that the customer is supposed to retain all the allowable features and services that

2   he or she had with BellSouth. Features such as hunting, call waiting, caller ID, etc. are

3   supposed to be retained automatically through the conversion process. In some cases

4   they aren't. Access suffered severely during the summer of 2000 when hundreds of our

5   customers lost their hunting feature upon conversion. The hunting feature provides the

6   ability for a customer to have one main listed number with additional lines 'in hunting'

7   behind the main number. Callers dial the main number and the hunting feature searches

8   for any available line in the 'hunt group' and processes the incoming call to any of the

9   customer's available lines. When the hunting feature is not programmed properly, it, in

10   effect, reduces the number of lines the customer can receive incoming calls to one, the

11   main number. For a small business customer, loss of this feature is almost as devastating

12   as losing service entirely. It must be understood that provisioning the UNE-P product is a

13   unique process, and performance measures must be developed to insure that BellSouth

14   recognizes that uniqueness and is held accountable for supporting the product effectively.

15

16   Q.   **WHAT DO YOU MEAN WHEN YOU SAY THAT YOU HAVE HAD TROUBLE**
17   **WITH "PROBLEM RESOLUTION?"**

18   A.   The provisioning problems described above are very complex and cannot be resolved

19   without intervention and assistance from BellSouth. They fall into 'purgatory' between

20   a service order problem and a maintenance problem. Though progress has been made,

21   24-hour access to trained, skilled BellSouth personnel must be improved. Therefore,

22   *Service Center* access measurements must reflect the criticality of the nature of UNE-P

23   calls. Since customer outages caused by the provisioning problems explained above must

24   usually be solved by the Service Center (not the Maintenance Center), access to it must

25   be the same as for the Maintenance Center.

1   BellSouth established a new centralized Service Center in Fleming Island, Florida in late

2   2000. Access was not informed beforehand of the change in Service Centers from

3   Birmingham to Fleming Island. This initially caused significant confusion and a drop in

4   service quality provided. Access and BellSouth have established a useful dialog to

5   resolve problems, however, Access remains concerned about: 1) the lack of experience

6   of the BellSouth employees; 2) ongoing amount of incorrectly processed orders; 3) ability

7   to resolve problems in a timely fashion.

8

9 **Q. WHAT SORT OF EFFECT DO THESE TYPES OF PROBLEMS HAVE AS NEW**

10   **ENTRANTS, LIKE ACCESS, TRY TO DEPLOY SERVICES TO TENNESSEE**

11   **CUSTOMERS?**

12 A.   For a carrier entering a new market, its potential customers must have confidence in the

13   reliability of the new carrier they are considering. For small businesses, few of its

14   operational elements are more important than telecommunications. Often, a prospective

15   small business customer's decision to change carriers is dependent on his perception of a

16   competing carrier's ability to provide reliable service. In Tennessee, Access will provide

17   a local service alternative to a market (small businesses) that has historically had few

18   options available to it. BellSouth operational problems can severely inhibit our ability to

19   provide that alternative.

20

21 **Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?**

22

23 A.   Yes it does.

24

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via facsimile or hand delivery, to the following on this the 16th day of July, 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St.
Suite 2101
Nashville, TN 37201-3300

Jim Lamoureux, Esq.
AT&T Communications of the South Central States
Room 8068
1200 Peachtree St., NE
Atlanta, GA 30309

Tim Phillips, Esq.
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202

Jon E. Hastings, Esq.
Boult, Cummings, Conners and Berry PLC
P.O. Box 198062
414 Union Street Suite 1600
Nashville, TN 37219

Charles B. Welch, Esq.
Farris, Mathews, et al.
618 Church Street, #303
Nashville, TN 37219

_____
Henry Walker