LAW OFFICES

GULLETT, SANFORD, ROBINSON & MARTIN, PLLC

230 FOURTH AVENUE, NORTH, 3RD FLOOR
POST OFFICE BOX 198888
NASHVILLE, TENNESSEE 37219-8888

TELEPHONE (615) 244-4994
FACSIMILE (615) 256-6339
WWW.GSRM.NET

GARETH S. ADEN
LAWRENCE R. AHERN III
G. RHEA BUCY
CHRISTOPHER W. CARDWELL
GEORGE V. CRAWFORD, JR.
GEORGE V. CRAWFORD III
R. SCOTT DERRICK
THOMAS H. FORRESTER
MARCY S. HARDEE
M. TAYLOR HARRIS, JR.
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ANDRA J. HEDRICK
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JEFFREY MOBLEY

WM. ROBERT POPE, JR.
WAYNE L. ROBBINS, JR.
JACK W. ROBINSON, JR.
JACK W. ROBINSON, SR.
VALERIUS SANFORD
WESLEY D. TURNER
PHILLIP P. WELTY

JOHN D. LENTZ
OF COUNSEL

B. B. GULLETT
1905-1992

October 22, 2001

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

Re: Docket to Determine the Compliance of BellSouth Telecommunications Inc.'s Operations Support Systems with State and Federal Regulations
Docket No. 01-00362

Dear Mr. Waddell:

Attached is the original and 13 copies of Direct Testimony of Jay M. Bradbury on behalf of AT&T Communications of the South Central States, Inc., and TCG MidSouth, Inc. Copies are being served on all parties of record today via U.S. Mail.

Very truly yours,

Jack W. Robinson, Jr.

Enclosures

cc: All Parties of Record

169917.1

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Direct Testimony of Jay M. Bradbury on behalf of AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc. in Docket No. 01-00362 was served by U.S. mail on the following parties of record this 22nd day of October, 2001:

James Wright, Esq.
United Telephone-Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

Henry Walker, Esq.
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, TN 37219

Fred J. McCallum
Lisa Foshee
BellSouth Telecommunications, Inc.
675 W. Peachtree Street, Suite 4300
Atlanta, GA 30375

Jon E. Hastings, Esq.
Boult, Cummings, et al.
PO BOX 198062
Nashville, TN 37219-8062

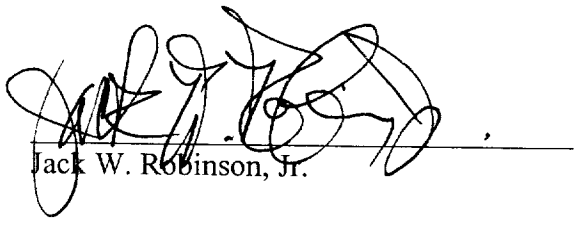
Terry Monroe
Competitive Telecom Assoc.
1900 M Street, NW. #800
Washington, DC 20036

H. LaDon Baltimore, Esq.
Farrar & Bates
211 Seventh Ave., N. # 320
Nashville, TN 37219-1823

Timothy Phillips, Esq.
Office of Tennessee Attorney General
PO BOX 20207
Nashville, TN 37202

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

Charles B. Welch, Esq.
Farris, Mathews, Branan, Bogango and
Hellen, PLC
618 Church Street, Suite 300
Nashville, TN 37219



Jack W. Robinson, Jr.

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DIRECT TESTIMONY OF JAY M. BRADBURY

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 01-00362

OCTOBER 22, 2001

BACKGROUND

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Jay M. Bradbury. My business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309.

Q. PLEASE DESCRIBE YOUR CURRENT POSITION AND RESPONSIBILITIES.

A. I am a District Manager in the AT&T Law and Government Affairs organization, and I provide consulting support to AT&T's business units and other internal organizations. Specifically, I am involved in the negotiation and implementation of interfaces for operational support systems ("OSS") necessary to support AT&T's entry into the local telecommunications market.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I graduated with a Bachelor of Arts degree in History from The Citadel in 1966. I have taken additional undergraduate and graduate courses at the University of South Carolina and North Carolina State University in Business and Economics. In 1987 and 1988, I participated in Advanced Management Programs at Rutgers University and the University of Houston. I earned a Masters Certificate in Project Management from Stevens Institute of Technology in 2000.

I began my AT&T career in 1970 as a Chief Operator with Southern Bell's Operator Services Department in Raleigh, North Carolina. From 1972 through 1987, I held various positions within Southern Bell's (1972 - 1984) and AT&T's (1984 - 1987) Operator Services Departments where I was responsible for the planning, engineering, implementation and administration of personnel, processes and network equipment used to provide local and toll operator services and directory assistance services in North Carolina, South Carolina, Kentucky, Tennessee and Mississippi.

In 1987, I transferred to AT&T's External Affairs Department in Atlanta, Georgia where I was responsible for managing AT&T's needs for access network interfaces with South Central Bell, including the resolution of operational performance, financial and policy issues. From 1989 through November 1992, I was responsible for AT&T's relationships (including the negotiation and administration of billing and marketing contracts, card honoring contracts, facility

contracts, and the support of sales of Network Systems products) with Independent Telephone Companies within the South Central Bell States and Florida. From November 1992 through April 1993, I was a Regulatory Affairs Manager in the Law and Government Affairs Division and was responsible for the analysis of industry proposals before regulatory bodies in the South Central States to determine their impact on AT&T's ability to meet its customers' needs with services that are competitively priced and profitable.

In April of 1993, I transferred to the Access Management Organization within AT&T's Network Services Division as a Manager - Access Provisioning and Maintenance with responsibilities for on-going management of processes and structures in place with Southwestern Bell to assure that their access provisioning and maintenance performance met the needs of AT&T's Strategic Business Units. In August 1995, I became responsible for the negotiation and implementation of interfaces for operational support systems ("OSS") necessary to support AT&T's entry into the local telecommunications market in the BellSouth states. I assumed my current position in June 1998.

INTRODUCTION

Q. WHAT IS THE PURPOSE OF THIS DOCKET?

A. The stated purpose of this docket is "to determine whether existing data or test results derived from OSS testing in other states is reliable and applicable to Tennessee and, in those instances were reliance on such testing is inappropriate,

to conduct necessary testing." To that end, the Tennessee Regulatory Authority ("TRA") set a procedural framework that divided the docket into two phases. Phase I focuses on the "regionality" of BellSouth's operational support systems ("OSS"). Phase II focuses on the reliability and completeness of data and test results from other states as an accurate indicator of BellSouth's performance in Tennessee.

Q. WHAT IS PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to explain that BellSouth OSS are not truly regional and that material differences in BellSouth's OSS performance can and do exist from state-to-state.

REGIONALITY

Q. PLEASE EXPLAIN "REGIONALITY."

A. The concept of regionality emerged in the Federal Communications Commission's ("FCC's") Order on Southwestern Bell's Section 271 application in Kansas and Oklahoma [1]. The FCC was faced with particular situations where state-specific performance data was either unavailable or unreliable because of low commercial volumes, and third-party testing had not been conducted in those

[1] Memorandum Opinion and Order, *In the Matter of Joint Application by SBC Communications Inc., southwestern Bell Tel. Co., and Southwestern Bell Communications Services, Inc. (d/b/a Southwestern Bell Long Distance) for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, 16FCC Rcd. 6237 (F.C.C. Jan.22, 2001) (No. CC01-29, FCC 00-217) ("Kansas and Oklahoma Order")*

states.[2] In that context, the FCC addressed two "regionality" issues: (1) the extent to which it would rely on its findings in previous orders granting section 271 approval; and (2) the extent to which it would rely on performance data from another state.[3] Ultimately, the FCC determined that in the absence of reliable state-specific data, it was appropriate to give weight to certain findings in its earlier Order in Southwestern Bell's Section 271 Application in Texas[4] ("Texas Order") and performance data from Texas.

The FCC's determination was based on the premise that similar processes will result in similar performance.[5] Given the lack of commercial volumes in Kansas and Oklahoma, that premise was useful. However, where sufficient commercial volumes do exist (as BellSouth claims here), the corollary to that premise is more probative -- similar performance results are indicative of similar processes. The reason is obvious. How can the TRA reasonably assume that BellSouth's OSS are the same if its OSS performance is not materially the same from state-to-state when significant commercial volumes exist?

Q. IF BELLSOUTH'S PERFORMANCE FROM STATE-TO-STATE IS MATERIALLY DIFFERENT, DOES THAT MEAN THAT DATA AND TEST RESULTS FROM OTHER STATES ARE IRRELEVANT?

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[2] FCC Kansas and Oklahoma Order ¶ 34.
[3] FCC Kansas and Oklahoma Order ¶ 35-36, 109.
[4] Memorandum Opinion and Order, *In the matter of Application by SBC Communications Inc., Southwestern Bell Tel. Co., and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas, 15FCC Rcd. 18,354*
[5] FCC Kansas and Oklahoma Order ¶ 113.

A. No. Given BellSouth's assertions that it attempts to implement its OSS on a regional basis, its performance should not be materially different from one state to another. Inconsistencies between third party test results, performance data in other states, and Tennessee-specific data can serve as a red flag that should prompt the TRA to investigate the situation. Such inconsistencies may indicate, among other things, problems with data integrity or discriminatory treatment. Third party testing is particularly well suited to flag potential problems because such tests can catch issues that may not be readily identified through performance data. Third party tests also act as spot checks on the reliability of performance data. Accordingly, properly conducted third party testing and comprehensive regional performance data, in conjunction with Tennessee-specific performance data, can be a useful tool for the TRA to identify performance areas that may warrant further investigation.

Q. HAVE THE SYSTEMS AND PROCESSES USED TO SUPPORT OPERATIONS IN TENNESSEE BEEN TESTED IN GEORGIA AND FLORIDA?

A. No. The Georgia and Florida tests have evaluated some aspects of BellSouth's OSS that are used to support operations in Tennessee, but the systems used in Tennessee have not been tested on an end-to-end basis. To varying degrees, each component of BellSouth's OSS differ based on geographic coverage. To evaluate the combined impact that these differences have on performance, the entire system must be evaluated on an end-to-end basis. End-to-end testing is necessary because the integration of BellSouth's various OSS is critical to performance. For

example, inaccurate information obtained during pre-ordering can cause problems during the ordering process. Errors during the ordering process can cause provisioning problems. Provisioning problems can cause billing and repair problems. All of the OSS processes are interdependent. Errors in one area may manifest themselves as problems in other areas.

In addition, BellSouth's OSS performance is dynamic. Indeed, the FCC recognized that its "review of a section 271 application must be based on a snapshot of a BOC's recent performance at the time an application is filed" and, therefore the FCC "cannot simply rely on our findings relating to an applicant's performance in an anchor state at the time we issued the determination."[6] The FCC, therefore, considers all relevant evidence in the record, including new evidence and changed circumstances.[7] Similarly, the military-style test performed in Georgia and Florida is based on a snapshot of BellSouth's performance at a particular time and based on particular evidence. For example, most of the testing in Georgia was conducted well before the testing in Florida. The Florida test, therefore, provides a more current snapshot of BellSouth's OSS, which should reflect include any system, process, and requirement changes that have occurred since the Georgia test.

Another aspect of OSS that has not been thoroughly evaluated is the functionality and performance of BellSouth's retail OSS. Under the Act, BellSouth is required

[6] FCC Kansas and Oklahoma Order ¶ 37.
[7] FCC Kansas and Oklahoma Order ¶ 35.

to provide CLECs with non-discriminatory access to its OSS. In many cases, there is a retail analog to wholesale OSS function that the TRA can use judge whether BellSouth is providing non-discriminatory access in terms of functionality (i.e., do CLECs have equivalent access to particular functions) and performance (i.e., does the access produce substantially the same quality of results).

Perhaps most importantly, the tests in Georgia and Florida were not conducted to performance standards adopted by the TRA. The TRA is in the process of establishing performance measures and standards for Tennessee. To the extent that the TRA's performance measures and standards differ from those used in the Georgia and Florida tests, those tests may not be applicable. This also would be true in areas where KPMG (presumably in conjunction with the Georgia and Florida Commissions) exercised their professional judgment to determine whether BellSouth satisfied the test. The TRA's judgment in these areas may be different.

Q. HOW DO BELLSOUTH'S OSS DIFFER FROM STATE-TO-STATE?

A. It varies based on two main factors. The regionality of BellSouth's OSS varies by OSS function (e.g., pre-ordering, ordering, provisioning, maintenance/repair, and billing) and sub-function (e.g., transmitting a trouble ticket versus performing the actual repair). The regionality of BellSouth's OSS also varies by the extent to which the function or sub-function requires manual processing. In general, manual processing and regionality have an inverse relationship -- the more manual processing, the less likely that BellSouth's performance will be

substantially the same throughout its region. I discuss the regionality of each major OSS function below.

PRE-ORDERING FUNCTIONS

Q. WHAT ARE PRE-ORDERING FUNCTIONS?

A. Pre-ordering functions are those activities through which a CLEC or BellSouth obtains the necessary information to place a service order. These functions include, but are not limited to validating street addresses, assigning telephone numbers, obtaining product/service information, obtaining due dates, obtaining loop make-up information, and accessing customer service records. Many pre-ordering functions can be performed electronically, but some must be performed manually.

Q. ARE THE ELECTRONIC SYSTEMS THAT PERFORM PRE-ORDERING FUNCTIONS THE SAME THROUGHOUT BELLSOUTH'S NINE-STATE REGION?

A. No. In general, the applications that BellSouth offers to perform pre-ordering functions have three components: (1) the front-end interface; (2) the legacy systems; and (3) the linkages between the interface and the legacy systems. The regionality of the applications that perform the various pre-ordering function is driven by the component of the particular application that has the lowest degree of regionality. As explained below, for example, the BellSouth legacy systems used to perform pre-ordering functions have a low degree of regionality. Consequently, BellSouth's pre-ordering applications have a low degree of

regionality because an application can only be as regional as its "weakest link" or "lowest common denominator."

Front End Interfaces

The primary front-end interfaces for pre-ordering (e.g., LENS and TAG) are largely regional but do have certain state-specific differences. For example, TAG contains databases regarding the availability of products and services, which differs by geographic location. Because the Tennessee database for products and services is different than databases for states, the products and services function in TAG is not regional. In addition, TAG and LENS contain programming that screens certain data from the CLEC's view depending on state in which the potential CLEC customer resides. For example, CLECs can view credit information for potential customers in Alabama but cannot view the same information for potential Tennessee customers.

Legacy Systems

The legacy systems used for pre-ordering functions (e.g., RSAG, ATLAS, PSIMS, COFFI, DSAP, and CRIS) are not regional for two main reasons: (1) the data within these systems differ by geography; and (2) different physical systems are used to support different states. These differences can impact the performance level of each pre-ordering function.

The data within BellSouth's legacy systems are inherently geographic. RSAG contains street addresses, which are based on geography. ATLAS contains telephone numbers that differ by geography (e.g., area code). PSIMS and COFFI

contain product and service information that can differ by central office. DSAP calculates due dates based on workloads at particular central offices. CRIS contains CSRs that are unique to each location. Thus, the data that supports each pre-ordering function differs from state-to-state.

The accuracy of BellSouth's response to a pre-ordering inquiry is driven by the accuracy of the data in its legacy systems. If the pre-ordering data is not accurate, it can cause problems in the processing and provisioning of service orders. The accuracy of this data can vary from state-to-state because the data is originally inputted manually. Absent qualitative evidence, the TRA cannot ascertain whether the accuracy of data in BellSouth's legacy systems is substantially the same from state-to-state.

BellSouth also uses different physical systems to support pre-ordering functions for the different states. For example, BellSouth uses RSAG, ATLAS, and CRIS to support all nine states. However, Florida, North Carolina, and South Carolina are supported by servers in Charlotte, North Carolina, whereas the other states in BellSouth's region (Alabama, Georgia, Kentucky, Louisiana, Mississippi, and Tennessee) are supported by servers in Birmingham, Alabama. A different breakdown applies to LFACS (Loop Facilities Assignment and Control System). Georgia, South Carolina, and Florida are supported out of Charlotte, and the remaining states are supported out of Birmingham. In addition, according to BellSouth, DSAP only supports Georgia, Florida, North Carolina, and South

Carolina. It is unclear what legacy system supports due date calculations for Tennessee consumers.

Using different servers in different locations can impact pre-ordering performance in at least two ways. First, accessing different locations require different communications links. The differences in these communications links can impact response times and reliability. Second, different servers may have different loads and reliability. Response times can vary based on the load on the server. Also, the reliability of the server can vary because of the quality of hardware and quality of maintenance. Again, qualitative evidence is necessary to ascertain whether these differences have a material impact on performance.

Linkages

BellSouth uses navigator contracts to link front-end interfaces with the legacy systems. It is unclear whether the navigator contracts are the same from state-to-state. However, as discussed above, the physical communications links between the front-end interfaces and the legacy systems differ from state-to-state based on the location of the legacy system servers supporting that state. The differences in the physical communications links can impact response times and reliability.

Q. ARE THE MANUAL SYSTEMS USED TO PERFORM PRE-ORDERING FUNCTIONS THE SAME THROUGHOUT BELLSOUTH'S NINE-STATE REGION?

A. No. Manual pre-ordering functions are usually performed in the context of complex orders and unbundled network elements. Like the electronic pre-

ordering functions, the data underlying manual pre-ordering functions are generally state-specific. Thus, differences can exist from state-to-state.

Also, because the process is manual, performance levels are less likely to be uniform. CLECs often obtain manual pre-ordering information from their account teams. While a CLEC will typically deal with its assigned account team regardless of state in which it is doing business, the account team must interface work groups that perform these functions on a geographic basis. The support received from these work groups can vary from state-to-state.

Account teams, moreover, may provide different levels of support. The account teams assigned to support CLECs that primarily do business in Tennessee may be different than the account teams that support CLECs that primarily do business in other states. Obviously, the focus of the TRA should be how well BellSouth's account teams support CLECs that serve Tennessee consumers.

ORDERING FUNCTIONS

Q. WHAT ARE ORDERING FUNCTIONS?

A. Ordering functions are those activities through which a CLEC or BellSouth submits a service order and that order is processed to be ready for provisioning. Ordering also includes all attendant notifications such as firm order confirmations, rejection notices, and jeopardy notices. CLECs can submit electronic orders for some products and services, but must submit manual orders for others. Even when CLECs submit accurate electronic orders, however,

BellSouth may process these orders manually because of BellSouth system design or BellSouth system error.

Q. ARE THE ELECTRONIC SYSTEMS THAT PERFORM ORDERING FUNCTIONS THE SAME THROUGHOUT BELLSOUTH'S NINE-STATE REGION?

A. The electronic systems that perform ordering functions appear to be centralized. However, it is unclear whether there are material differences in performance levels from state-to-state. For example, one important measure of performance is order flow through. Flow through measures the extent to which electronic orders flow through BellSouth's systems without manual intervention. BellSouth apparently can report its flow through performance on a state-by-state basis, but has chosen not to provide such reports. Without this and similar state-specific data, it is impossible to determine whether BellSouth's performance is materially the same throughout its nine state region.

The flow through data that BellSouth does provide demonstrates that material performance differences exist depending on the interface used (LENS, TAG, and EDI) and the product type ordered (residential resale, business resale, UNEs, LNP). Tennessee consumers may be ordering a different mix of products and services than consumers from other states. Thus, regional flow through rates may not accurately reflect that flow through rates actually experienced by Tennessee consumers. Similarly, CLECs serving Tennessee consumers may be using a different mix of interfaces than used in other states. Thus, the blended flow

through rates for each product type may not be representative of the flow through rate in Tennessee.

Another factor impacting the ordering process is the fact that the process relies upon information contained in the same legacy systems discussed above under pre-ordering. Further, the critical legacy system involved in the ordering process – the Service Order Communication System ("SOCS") is not singular. In fact, one SOCS located in Charlotte serves North Carolina, South Carolina and Florida and another located in Birmingham serves the other six states including Tennessee.

In sum, while BellSouth may offer a centralized ordering system, that does not necessarily mean that performance levels are materially the same from state-to-state.

Q. ARE THE MANUAL SYSTEMS THAT PERFORM ORDERING FUNCTIONS THE SAME THROUGHOUT BELLSOUTH'S NINE-STATE REGION?

A. No. BellSouth uses three different local carrier service centers (LCSC) to process manual orders and "partially mechanized" orders (i.e., electronic orders that fall out for manual processing by BellSouth system design or BellSouth system error). The Atlanta and Birmingham LCSCs are primarily dedicated to processing orders, whereas the Fleming Island LCSC is primarily dedicated to handling telephone calls. While the three LCSCs are capable of processing orders for all states,

Tennessee may be more dependent on one LCSC than another because CLECs are assigned to specific LCSCs. For example, data received from BellSouth indicates that approximately 66 percent of all manually processed orders from Georgia and Florida are handled by the Atlanta LCSC. In contrast, approximately 66 percent of all manually processed orders from the seven remaining BellSouth states are handled by the Birmingham LCSC. Consequently, performance data on manually handled orders from Georgia and Florida may not reflect the performance levels experienced by CLECs supporting Tennessee consumers because the Birmingham and Atlanta LCSCs may be operating at different performance levels.

Another difference in manual handling is that BellSouth uses SONGS to enter manual orders for consumers in the former South Central Bell states whereas BellSouth uses DOE to enter orders for the former Southern Bell states. It is impossible to ascertain whether the differences in these systems have any material impact on performance without complete data on its day-to-day commercial production experience. BellSouth, however, has not provided such data, even though such data apparently is available.

PROVISIONING FUNCTIONS

Q. WHAT ARE PROVISIONING FUNCTIONS?

A. Provisioning functions are those activities through which BellSouth installs the actual products and services ordered. While BellSouth uses a number of electronic systems in the provisioning process, provisioning is heavily dependent on manual processes performed along geographic lines.

Q. ARE THE ELECTRONIC AND MANUAL SYSTEMS THAT PERFORM PROVISIONING FUNCTIONS THE SAME THROUGHOUT BELLSOUTH'S NINE-STATE REGION?

A. No. The actual provisioning of products and services is performed locally. The timeliness and quality of BellSouth's provisioning is dependent on many factors that vary by location such as the skill of the workforce, workload, the physical plant, and customer requirements. Further, the support systems used are not singular, for example a key system Work Force Administration ("WFA") appears twice and serves the same clusters of states listed for SOCS under ordering above. Thus, it is inappropriate to assume that BellSouth's provisioning performance in Tennessee is substantially the same as its performance in Georgia or Florida.

MAINTENANCE & REPAIR FUNCTIONS

Q. WHAT ARE MAINTENANCE AND REPAIR FUNCTIONS?

A. Maintenance and repair (M&R) functions are those activities through which BellSouth keeps provisioned products and services in good working order. Like provisioning, while BellSouth uses a number of electronic systems in the M&R process, M&R is heavily dependent on manual processes performed along geographic lines.

Q. ARE THE ELECTRONIC AND MANUAL SYSTEMS THAT PERFORM M&R FUNCTIONS THE SAME THROUGHOUT BELLSOUTH'S NINE-STATE REGION?

A. No. Like provisioning work, the actual M&R work is performed locally and, therefore, the timeliness and quality of that work is dependent on many factors that vary by location. Once again, the support systems are aligned geographically. Thus, it is inappropriate to assume that BellSouth's M&R performance in Tennessee is substantially the same as its performance in Georgia or Florida.

BILLING FUNCTIONS

Q. WHAT ARE BILLING FUNCTIONS?

A. Billing functions are those activities through which BellSouth records, processes, and provides usage and billing data. It appears that BellSouth has largely (but not completely) automated the billing function.

Q. ARE THE SYSTEMS THAT PERFORM BILLING FUNCTIONS THE SAME THROUGHOUT BELLSOUTH'S NINE-STATE REGION?

A. No. Usage data is recorded locally at a particular network element. Thus, there may be differences in recording accuracy from location to location. The usage data is transmitted to a centralized processing facility, which processes the data on a geographic basis. Billing data is dependent on local inputs as well. For example, each CLEC in each state has one or more separate rate tables that are used to generate billing information. Also, billing data is dependent on accurate ordering and provisioning data, which may vary from state-to-state. Because of these and other differences, it is inappropriate to assume that BellSouth's

performance in billing is substantially the same from state-to-state. Indeed, the Georgia and Florida tests have produced results.

CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. BellSouth's OSS are not truly regional. Certainly, BellSouth has attempted to centralize and automate particular processes to increase uniformity throughout its region. However, there still remain many factors that vary from state-to-state, and these factors can impact BellSouth's performance. The best measure of the regionality of BellSouth's OSS is reliable performance data that compares BellSouth's performance in each state in its region. BellSouth's self-serving statements that its processes are regional, without providing performance data substantiating that its processes produce materially the same results, are simply insufficient to establish the regionality of its OSS.

Q. DOES THAT CONCLUDE YOUR TESTIMONY?

A. Yes.