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January 16, 2003

VIA FACSIMILE & US MAIL

Mr. Jonathan N. Wike, Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
800-342-8359x171-Mr. Wike
Fax: 615-741-5015

Re: Docket No. 02-00058

Dear Mr. Wike,

Enclosed is the pre-trial testimony that I will be using at the hearing.

Yours truly,

Michael Van Wies

cc: R. Dale Grimes, Bass, Berry & Sims, PLC (Via Facsimile & US Mail)
       Ross I. Booher, Bass, Berry & Sims, PLC (Via Facsimile & US Mail)

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Here is the testimony I will be using, I asked the following questions and my expert witness John Russell provided the response.

1. I have had problems in placing calls to phone numbers outside my local exchange to lines served by BellSouth. What would be the most likely cause of this in a Central Office?

Answer: The most common cause would be problems with the Outgoing Trunks. Either the group is too small to serve the demand or too many Trunks are out of service (defective). In most cases these Trunks have a "overflow" routing to another Trunk Group to handle the overflow and maintain service.

2. How does an operating company monitor this Trunk information to determine if they need more Trunks or if they may have a maintenance problem?

Answer: All Nortel and Lucent Central Office Switches provide numerous reports on service and in particular Trunk usage data. These reports are available on a routine schedule or a demand basis by inputting a message into the Switch. These Reports can provide hourly, daily, weekly, monthly and annual data and are routed to different departments for different purposes.

3. What are some of the uses of this data?

Answer: This data is used for Planing and Engineering of new equipment when Trunk usage is too high. Administrative personnel use this data to provide reports to regulatory agencies and upper level management uses it for the monitoring of hardware and maintenance personnel performance. The Central Office supervisor normally utilizes it to monitor the Switch performance and maintenance they are responsible for.

4. Where would this data normally be stored?

Answer: These reports are normally maintained in the Switch on a hard disk for 12 months to provide annual reports. Most other departments maintain this data in Desktop computers, paper files or various electronic storage media such as floppy disks, CD-ROM, or various types of magnetic tapes.

5. So this data is normally found stored in multiple locations?

Answer: Yes

6. CenturyTel has said that this data was too "voluminous" to store. How large are these reports?

Answer: Depending on the size of the office and the generic or issue of software the Switch is utilizing, the report could be from 1 to 3 sheets of typical 8 1/2 by 11 paper per monthly Trunk report or about 36 sheets a year. Many years of this data could be stored on a single floppy disk and the data for all of CenturyTel's offices, for all the years they have been in operation could be stored on a single CD-ROM or Data Tape.

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7. CenturyTel has stated that the data was "automatically purged". Are you aware of any software in the switch that will automatically search out and "purge" this data from multiple locations of computers and files?

Answer: No Switch in use that I am familiar with, including the Nortel DMS 100/200 and all-Lucent Switches (#1, #1A, #2, #2B, #3, TSPS, and #5) has these capabilities. This would take custom software in a separate mainframe to track the locations and devices that store this data and "automatically purge" the data from the various locations. It would also have to notify all recipients to "purge" the hard copies that exist. In my opinion the cost of developing a system to "automatically purge" data that is important to the operation and maintenance of an office and required to be maintained would be a very expensive and cumbersome system that provides no benefit to an operating company. In fact this would put CenturyTel in violation of, in this instance, the State of Tennessee requirements to maintain this data.

8. Can you provide any reasons an operating company would not maintain this data?

Answer: There is no benefit to destroying this data and in fact would probably result in poor maintenance and engineering support without the data. The only reasons I can think of would be to prevent regulatory agencies from accessing the data, if for example, they are not providing the level of service required. Other than that, only gross incompetence of the operating company as far as maintaining service and meeting regulatory requirements would explain not utilizing and maintaining this data.

9. You mentioned Overflow Trunk groups. If these were utilized, would there be a record of that in the Switch?

Answer: Yes, If the Trunk Group were routed to an overflow Group the switch would maintain that data also. The far end C.O. (in this case BellSouth) would also monitor the overflow group for any indication of problems.

10. So BellSouth would know that CenturyTel had problems due to the utilization of the overflow group. Suppose that for some reason you wanted to prevent these calls from going to the overflow Group. How difficult would this be to accomplish?

Answer: All current Switches use software to route calls. In this case it would be simple input messages to make a routing change in the switch and prevent the calls for going to the overflow group and thus hide the problem from the far end C.O.

11. So if the far end has no overflows there could still be problems at the near end (CentuyTel)?

Answer: Yes, BellSouth does not have access to the CenturyTel Switch data and can only go by any overflow is sees to determine if a problem exists. If, for example, CenturyTel does not allow the calls to go to the overflow group, BellSouth would have no way of knowing.

12. Hypothetically speaking, how difficult would it be to hide a problem like this if an operating company did not want to spend the capital to add trunks?

Answer: Simple, change the routing of the overflow calls to prevent the far end from seeing the problem and submit bogus numbers to any regulatory agency. The only way this could be revealed would be to produce the raw data, if they do not provide the data they would be in a safe position as there would be no way to prove they have a problem. The only way to prove they

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have a problem is with the data, if the data were not produced they would only be faced with a violation of record keeping not one of providing poor service.

13. In your experience as a C.O. supervisor were you responsible for maintaining these records and, do you have knowledge of the purpose of maintaining these records for regulatory agencies?

Answer: My training as a C.O. supervisor included instruction as to the importance of these records for complaint resolution with a customer or regulatory agency. Without these records there would be no way to prove we were providing the level of service required.

In response to your request about subsection (e) of my December 20, 2002 response. Ken Vandergriff was a DMS-100 Electronics Technician for BellSouth who recently passed away, and Angelica Riley is a DMS-100 trained Electronics Technician for BellSouth. They were consulted to verify plant measurement printouts and recent change procedures, by my expert witness John Russell.

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Fax Transmittal

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Re:	Docket No. 02-00058	**CC:**	R. Dale Grimes, Ross I. Booher

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● **Comments:**
Dear Mr. Wike,

Please find attachments.

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