

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

September 14, 2007

In re: Complaint of BLC Management, LLC)
d/b/a Angles Communication Solutions)
Against BellSouth Telecommunications, Inc.)
to Resolve Billing Disputes, Enforce the)
Parties' Interconnection Agreement, and)
Prevent Interference with Service to)
Customers)

Docket No. 07-00053

**PRE-FILED DIRECT TESTIMONY
OF
STEVE WATSON**

1 Q: State your name, please, and what you do for a living.

2 A: I am Steve Watson, and I work for CGM Telecom Services.

3 Q: Please describe your background and experience.

4 A: My resume is attached as Watson Exhibit 1.

5 Q: What is the purpose of your testimony?

6 A: The purpose of my testimony is to discuss whether Angles Communication Solutions has
7 remained current in its payments to BellSouth since June 7, 2006.

8 Q: Please describe your work with Angles.

9 A: Since June, 2006, I have worked with Angles to insure that each month, Angles is
10 informed of the amount due BellSouth, less disputed charges and claims for promotional
11 credits. We file, on behalf of Angles, notice of billing disputes and claims for
12 promotional credits and track the progress of those filings. As of February 28, 2007,
13 those unresolved/open disputed charges and promotional claims totaled \$703,635.00.

14 Q: Have you discussed those disputes and claims for promotional credits with BellSouth?

15 A: Yes. Based on my discussions with BellSouth representatives, it is my understanding
16 that BellSouth concurs with that figure as of that date.

17 Q: Do you also track payments made by Angles to BellSouth?

18 A: Yes. Every month, we also confirm receipt of all payments made by Angles to
19 BellSouth.

20 Q: From June, 2006, through March 2, 2007, did Angles pay the entire, undisputed amounts
21 of their invoices from BellSouth?

22 A: Yes. CGM records show that Angles has paid the entire undisputed amounts of their
23 BellSouth invoices from June, 2006, through present time.

24 Q: Have you also examined Angles' payments to BellSouth for the months of March and
25 April, 2007?

26 A: Yes.

27 Q: Has Angles remained current during that period?

28 A: CGM records now show that relative to the BellSouth bill period due in March and April
29 2007, Angles has withheld the disputes and promotions we filed on their behalf and
30 remitted payment for the entire remaining amounts due in March and April 2007
31 excluding approximately \$4,000.00 currently being researched by CBM and Angles.

32 Q: Have you continued to track Angles' bills and payment in May through April 2007?

33 A: Yes.

34 Q: Has Angles remained currently during that period?

35 A: We are currently in discussions with BellSouth to address that question. I do not yet
36 know if Angles has remained current during this period.

37 Q: Do you know if Angles is prepared to correct any such shortfall?

38 A: Based on my discussions with Angles, it is my understanding that Angles has committed
39 to the TRA to remain current and that if we determine that any shortfall exists, Angles
40 will immediately make arrangements to pay the full amount owed.

41 Q: Does that complete your testimony?

42 A: Yes.

CV for Steven T. Watson, Account Manager, CGM, LLC.

Qualification of Experience

My name is Steven T. Watson. I am currently an Account Manager with CGM, LLC, of Roswell, GA, a telecommunications software service bureau, and the principal owner of Lost Key Telecom, of Pensacola, FL, a promotional credit processing bureau. Both companies offer cost recovery services to the competitive local exchange carrier (CLEC) market.


I founded Teleconex, Inc., a Pensacola-based CLEC in 1997, and grew the base to 15,000 lines prior to its selling the company in 2003. While principal owner and President of Teleconex, I oversaw the design and creation of pioneering provisioning, billing and dispute management techniques that are widely employed in the industry today. Teleconex managed business and residential CLEC service and bought services from both the Resale and UNEP tariffs. During our six years in business, I oversaw the delivery and settlement of over \$1Million dollars in ILEC disputes.

After selling Teleconex in 2003, I started Lost Key Telecom to assist other CLECs in identifying, processing and successfully settling promotional credits with Bell South. Lost Key Telecom, Inc. has provided service to over a dozen CLECs in the two years it has been in business. We have settled over \$5Million in ILEC promotional claims on behalf of our customers.

In early 2006, I became an Account Manager with CGM, LLC. I represent CGM's WIN service in the prepaid CLEC marketplace, and assist CGM customers in aggressively managing their ILEC dispute opportunities, improving their provisioning efficiency, and driving overall profitability. WIN provides CLECs with business intelligence reporting. CGM currently has approximately 35 CLECS for which we identify, process, negotiate and settle ILEC disputes.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to Mr. Guy Hicks, AT&T of Tennessee, 333 Commerce Street, Nashville, TN 37219 on this the 14th day of September, 2007.


Henry Walker