

**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
CHARLES CAMPBELL**

1 Q: State your name and place of employment.

2 A: My name is Charles Campbell. I am a principal of CGM Telecom Services.

3 Q: What is the purpose of your testimony?

4 A: In 2006, Angles Communication Solutions hired CGM to begin reviewing and tracking

5 Angles' bills from and payments to BellSouth. the purpose of my testimony is to

6 describe my communications with BellSouth regarding those bills and payments.

7 Q: Please describe your training and background.

8 A: My resume is attached as Campbell Exhibit 1.

9 Q: Please describe what CGM does for Angles.

10 A: Each month CGM reviews the bills from BellSouth, submits request for promotional

11 credits and files disputes regarding inaccurate or inappropriate charges. Through

12 December, 2006, CGM provided Angles with a monthly spreadsheet identifying the open

13 balances, the current charges and the total of unresolved, open disputes. Angles would

14 determine the amount of their payments based on this input. CGM's web-based

15 application would identify the receipt of payments made by Angles to BellSouth by

16 processing the following month's ILEC invoice. CGM and Angles have followed this

17 procedure since July, 2006.

18 Q: Were you also involved on behalf of Angles in trying to resolve a billing dispute with

19 BellSouth in June, 2006?

20 A: Yes.

21 Q: Please describe those discussions.

22 A: In early June, 2006, BellSouth suspended Angles' access to LENS because of a shortfall

23 in the payment of undisputed charges. On behalf of Angles, I had several

24 communications with Ms. Leisa G. Mangina of BellSouth. One June 7, 2006, Ms.

25 Mangina sent me an email stating that the total balance due as of that day was
26 \$385,834.56. She wrote that BellSouth recognized a total of \$265,431.95 in unresolved
27 disputes and outstanding claims for promotional credits. The email stated that Angles
28 would have to pay the difference \$120,402.61 "to get lens back up." She also sent
29 instructions on how Angles should wire that amount to BellSouth.

30 Q: Do you have a copy of those emails?

31 A: Yes. They are attached to my testimony as Campbell Exhibit 2.

32 Q: Based on those emails and conversations, what was your understanding of BellSouth's
33 position on the billing dispute?

34 A: I understood from her email and our previous communications that the amount she
35 described was the total amount due to BellSouth as of June 7, 2006, less unresolved
36 disputes and outstanding promotional claims. I understood that if Angles paid that
37 amount, Angles' outstanding balance in undisputed charges would be reduced to zero.

38 Q: Did Angles pay the amount requested by BellSouth?

39 A: Yes. Angles paid that amount on June 7, 2006.

40 Q: Does that complete your testimony?

41 A: Yes.

CV for Charles R. Campbell, Principal, CGM, LLC

Qualification of Experience

My name is Charles R. Campbell. I am a principal and partner of CGM, LLC, of Roswell, Georgia, a telecommunications consulting firm and software services bureau, offering back-office and billing analysis and recovery services to the competitive local exchange carrier market.

I received a Bachelor's degree in Economics from Bethany College in 1984. My twenty-two years of experience in the telecommunications field began in Client Services/Marketing with Nynex Corporation in 1984. I held a number of assignments with Nynex's Strategic Sales Division in which my teams designed, sold and implemented enterprise network services from across the technology spectrum, to New England's largest financial institutions and drove all aspects of client and carrier service order entry, provisioning, and billing.

During August of 1994, I accepted the position of Director of Marketing and Sales with ITA, a LEC billing and collection clearinghouse. During my two and a half-year tenure, I created the support infrastructures to successfully manage a ten-fold increase in monthly revenues and twenty-fold increase in margin. I implemented system controls to immediately identify and address revenue fallout and poor billing process practices.

In 1997 I became a principal in CGM, LLC a telecommunications consulting firm specializing in billing process optimization, back office financial controls and operational/financial data extraction, consolidation and analysis. During the past three years, I have managed a number of projects for CGM clients in the arenas of billing and revenue assurance, back office process optimization, and operational/financial data analysis. As a Billing Process Revenue Assurance Consultant, I worked with a mid-sized reseller of carrier and billing services to develop an efficient services support platform and improve margin. I established software tools to manage and analyze billing data, documented methods and procedures and created measurement reporting to improve back office efficiencies in the area of provisioning and billing fallout management. As a temporary General Manager, I directed all aspects of the LEC billing process for a LEC billing clearinghouse. I streamlined the Customer Care operation, improved the integration of the returns processing function, and developed a comprehensive system of process controls and measurement reporting.

CGM developed a software application in 2002 by the name of Wholesale Invoice Navigator (WIN). WIN provides CLECs with business intelligence reporting that allows them to manage their ILEC accounts payable data, identify ILEC billing disputes, improve margin and provision lines efficiently. Through the WIN service platform, we have negotiated and settled over \$10 Million dollars in ILEC disputes and promotional credits on behalf of CLEC clients.

CGM currently has approximately 35 CLECS for which we identify, process, negotiate and settle ILEC disputes and promotional credits. We work with all major ILECs on both the UNEP and Resale tariffs and billing platforms.

-----Original Message-----

From: Mangina, Leisa G

Sent: Wednesday, June 07, 2006 10:53 AM

To: 'Charles Campbell'

Subject: RE: Open Angles Comm BS Claims

Importance: High

Chuck,

We don't have \$28K in open disputes. Brian will need to only deduct the amount Keith Deason has given him \$210,950.00 and \$54,408.00 on the promos. I have in open status other than promotional money \$73.95. The balance today is \$385,834.56. The amount to pay to get lens back up will be \$120,402.61.

Wiring Instructions

ABA Route #062000019

AmSouth Bank

1900 5th Av N

Birmingham, AL 35203

Account #000000477

Leisa

-----Original Message-----

From: Charles Campbell [<mailto:crcamp@cgminc.com>]

Sent: Wednesday, June 07, 2006 9:55 AM

To: Mangina, Leisa G; Steve Watson; Brian Cox

Subject: Open Angles Comm BS Claims

Leisa,

Can we call you in a couple of minutes about the \$28K of open claims (attached). This is the last issue to be addressed in getting Angles Communications turned back on.

Thanks,

Chuck Campbell

Principal

CGM, LLC

770. 594-3860 x.224

Walker, Henry

From: Steve T Watson [swatson@lostkeytelecom.com]
Sent: Thursday, August 16, 2007 4:44 PM
To: Brian Cox
Cc: Walker, Henry
Subject: FW:

From: Mangina, Leisa G [mailto:Leisa.Mangina@BellSouth.com]
Sent: Wednesday, June 07, 2006 11:19 AM
To: Brian Cox; Deason, Keith
Cc: Steve Watson; Charles Campbell
Subject: RE:

Brian,

I have responded back to Chuck with the amount needed to be paid. I also have included the wiring instructions.

Leisa

-----Original Message-----

From: Brian Cox [mailto:brian@anglescs.com]
Sent: Wednesday, June 07, 2006 9:58 AM
To: Deason, Keith
Cc: Mangina, Leisa G; Steve Watson
Subject: Re:

Quick clarification - it is \$23k.

Thanks for your time Keith - Leisa. Chuck left a message for you and if you can call us at your earliest convenience, that would be super - thanks!

Deason. Keith wrote:

Leisa,

Based on my conversation with Angles Communication, Lost Key Telecom and CGM, we have come to an agreement on the current balance owed. They told me that they would wire you the full amount once they came to an agreement with you about outstanding disputes that are outside of resale promotions. I would appreciate you emailing me once you have received the discussed amount. The estimate was roughly \$177,479.14, minus any outstanding disputes (they gave me a dollar amount of \$2,800.00) in non promotional disputes.

If you have any questions, please let me know. I look forward to hearing from you with the response once you have received the balance from Angles.

Keith Deason

To change your preferences for receiving commercial electronic mail messages from BellSouth's Small

8/16/2007


CAMPBELL EX. 2

Business Services organization. click here <<mailto:sbs.optout@bellsouth.com?subject=UNSUBSCRIBE>> or to unsubscribe from all future commercial electronic mail messages send a reply e-mail to sbs.optout@bellsouth.com <<mailto:sbs.optout@bellsouth.com>> with UNSUBSCRIBE in the subject line.
BellSouth SBS Anti-Spam
1057 Lenox Park Blvd.
Suite 200
Atlanta, GA 30319

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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