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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF W. KEITH MILNER
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION
DOCKET NO. 00-465
FEBRUARY 6, 2001

Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present position since February 1996.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 30 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international arenas.

1 I graduated from Fayetteville Technical Institute in Fayetteville, North
2 Carolina, in 1970, with an Associate of Applied Science in Business
3 Administration degree. I later graduated from Georgia State University
4 in 1992 with a Master of Business Administration degree.

5

6 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC
7 SERVICE COMMISSION?

8

9 A. I have previously testified before the state Public Service Commissions
10 in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, and
11 South Carolina, the Tennessee Regulatory Authority, and the North
12 Carolina Utilities Commission on the issues of technical capabilities of
13 the switching and facilities network introduction of new service
14 offerings, expanded calling areas, unbundling, and network
15 interconnection.

16

17 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

18

19 A. In my testimony, I will address the technical aspects of network related
20 issues which have been raised in the Petition for Arbitration filed by
21 AT&T Communications of the South Central States, Inc. ("AT&T") in
22 this docket. Specifically, I will address the following issues, in whole or
23 in part: Issues 16 and 18.

24

25

1 **Issue 16: Is conducting a statewide investigation of criminal history**
2 **records for each AT&T employee or agent being considered to work on**
3 **a BellSouth premises a security measure that BellSouth may impose on**
4 **AT&T?**

5

6 Q. WHAT IS YOUR UNDERSTANDING OF THE DISPUTE BETWEEN
7 BELLSOUTH AND AT&T IN ISSUE 16?

8

9 A. AT&T and BellSouth disagree as to what security measures are
10 necessary to protect BellSouth's network when AT&T's employees or
11 agents are given unescorted access to BellSouth's premises.

12

13 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

14

15 A. BellSouth performs criminal background checks on its employees prior
16 to hiring. AT&T should do the same in order for AT&T's employees or
17 agents who enjoy unescorted access to BellSouth's central offices and
18 other premises. Such security requirements are reasonable in light of
19 the impact on public safety and the assets being protected as well as
20 the number of new entrants and other telecommunications carriers
21 who rely on the integrity and reliability of BellSouth's network. AT&T's
22 offer to indemnify BellSouth for bodily injury or property damage is not
23 sufficient in light of the asset at risk. Indemnification is an after the fact
24 solution. By requiring criminal background investigations, BellSouth is
25 seeking to protect the consumer and other CLECs up front from the

1 incumbent risks.

2

3 BellSouth is willing to agree that it would be acceptable whereby any
4 employees hired by AT&T prior to January 1, 1995, would not be
5 required to have criminal background checks. That is, of course,
6 assuming AT&T assures BellSouth of no criminal activity on the part of
7 the employee since that time.

8

9 Q. DESCRIBE THE SPECIFIC SECURITY CHECKS BELLSOUTH
10 REQUIRES OF ITS EMPLOYEES, VENDORS, AND OTHER
11 AGENTS THAT ARE IN EFFECT TODAY.

12

13 A. BellSouth requires a seven (7) year criminal background check for all
14 of its employees prior to hiring, and a five (5) year criminal background
15 check for vendors and agents.

16

17 Q. ARE THERE ANY OTHER SPECIFIC REQUIREMENTS THAT THE
18 CLEC SHOULD CONSIDER WHEN ASSIGNING VENDORS AND
19 AGENTS TO BELLSOUTH'S PREMISES?

20

21 A. Yes. The CLEC should not knowingly assign to BellSouth's premises
22 any individual who is a former employee of BellSouth and whose
23 employment with BellSouth was terminated for a criminal offense
24 whether or not BellSouth sought prosecution of the individual for the
25 criminal offense.

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Also, the CLEC should not knowingly assign to BellSouth's premises any individual who is a former contractor of BellSouth and whose access to BellSouth's premises was revoked due to commission of a criminal offense whether or not BellSouth sought prosecution of the individual for the criminal offense.

Q. DOES BELLSOUTH MEET THE FCC'S REQUIREMENT THAT PERMITS COLLOCATORS DIRECT ACCESS TO ITS EQUIPMENT WITHOUT BEING ESCORTED BY BELLSOUTH PERSONNEL AND WITHOUT THE COLLOCATOR'S EQUIPMENT BEING PHYSICALLY SEPARATED BY A WALL OR OTHER STRUCTURE FROM BELLSOUTH'S EQUIPMENT OR THE EQUIPMENT OF OTHER CLECS?

A. Yes. However, the FCC's Order raises serious concerns that must be addressed in order to retain the level of network reliability and security that currently exists and which end users and regulators have come to expect. BellSouth has addressed those concerns and is compliant with the FCC's requirements. A simple reading of today's newspaper headlines reveals the need for stringent control over the access to and operation of the public telephone network. In order to provide reasonable security measures, BellSouth requires that all collocators' employees and agents undergo the same level of security training, or its equivalent, that BellSouth's own employees, or third party

1 contractors providing similar functions, must undergo. Each collocator
2 must provide its employees and agents with picture identification,
3 which must be worn and be visible in the collocation space or other
4 areas in and around BellSouth's central offices. In its Order, the FCC
5 permitted incumbent LECs to impose security arrangements that are
6 as stringent as the security arrangements the incumbent LEC
7 maintains at its premises for its own employees. BellSouth is not
8 requiring CLECs to perform a seven (7) year criminal background
9 investigation, as it does for its own employees. Rather, BellSouth
10 requires only a five (5) year criminal background check of BellSouth's
11 vendors and agents and for collocators' employees or agents. Under
12 BellSouth's proposal, collocators are required to conduct an
13 investigation of criminal history records for each of the collocator's
14 employees and agents being considered for work within or upon
15 BellSouth's premises. Restrictions are imposed on a collocator's
16 employees or agents with felony or misdemeanor criminal convictions.
17 Also, the FCC's Order provides for additional security measures such
18 as allowing BellSouth to provide a cage around its own equipment.
19 Thus, BellSouth is in compliance with the security provisions required
20 by the FCC's Order.

21

22 Q. DOES BELLSOUTH REQUIRE THAT AT&T PERFORM SECURITY
23 CHECKS OF ALL ITS EMPLOYEES?

24

25 A. No. BellSouth is indifferent to the security measures and background

1 checks AT&T makes for its employees to access its own buildings.
2 However, BellSouth is rightly concerned for proper security measures
3 and background criminal checks for those of AT&T's employees for
4 which AT&T wants unescorted access to BellSouth's premises. If
5 AT&T doesn't want to perform background criminal checks of all of its
6 employees, it need only check those of its employees it wants admitted
7 to BellSouth's premises.

8

9 Q. IS THE CRIMINAL BACKGROUND CHECK PROPOSED BY
10 BELL SOUTH EFFECTIVE IN LIMITING OR RESTRICTING A
11 WORKER FROM HARMING OR DAMAGING PROPERTY?

12

13 A. Yes. Criminal background checks are a reasonable way to prevent
14 known criminals from even being in a place where they could cause
15 harm or damage to BellSouth's or a CLEC's network.

16

17 Q. DOES BELL SOUTH'S PROPOSAL IMPOSE DISCRIMINATORY
18 SECURITY REQUIREMENTS ON AT&T THAT IT DOES NOT
19 IMPOSE ON ITSELF?

20

21 A. No. ILECs such as BellSouth are entitled under the FCC's order to
22 "impose reasonable security arrangements to protect their equipment
23 and ensure network security and reliability." Advanced Services Order
24 at paragraph 46. That is all BellSouth's policy is meant to do.
25 BellSouth believes a simple reading of today's newspaper headlines is

1 sufficient to underscore the public's need for secure, reliable
2 communications. BellSouth's security policies are a reasonable
3 balance between giving CLECs unfettered access to BellSouth's
4 premises while maintaining network reliability and security.

5

6 **Issue 18: Has BellSouth provided sufficient customized routing in**
7 **accordance with State and Federal law to allow it to avoid providing**
8 **Operator Services/Directory Assistance (“OS/DA”) as a UNE?**

9

10 Q. WHAT IS BELLSOUTH’S POSITION ON THIS ISSUE?

11

12 A. BellSouth has available both an Advanced Intelligent Network (AIN)
13 solution for customized routing as well as the Line Class Code (LCC)
14 solution that was advocated by AT&T during the last round of
15 arbitrations. Thus, BellSouth has met its requirement to provide
16 customized routing and as a result is not obligated to provide access to
17 operator services and directory assistance at UNE rates.

18

19 Q. WHAT DO THE FCC RULES SAY ABOUT ACCESS TO OPERATOR
20 SERVICES AND DIRECTORY ASSISTANCE?

21

22 A. The FCC’s Rule 319(f) makes clear that BellSouth is not required to
23 unbundle OS/DA where it provides CLECs “with customized routing or
24 a compatible signaling protocol.”

25

1 Q. WHAT IS CUSTOMIZED ROUTING?

2

3 A. Customized routing (which has also been referred to as selective
4 routing) allows calls from a CLEC's customers served by a BellSouth
5 switch to reach the CLEC's choice of operator service or directory
6 assistance service platforms instead of BellSouth's operator service
7 and directory assistance service platforms. Customized routing can be
8 provided when a CLEC acquires unbundled local switching from
9 BellSouth or resells BellSouth's local exchange services.

10

11 Q. DOES BELLSOUTH PROVIDE CUSTOMIZED ROUTING TO
12 REQUESTING CLECS?

13

14 A. Yes. BellSouth has a Line Class Code (LCC) solution for customized
15 routing as well as an Advanced Intelligent Network (AIN) solution.
16 Thus, BellSouth has met the FCC's requirements and is not obligated
17 to provide operator services and directory assistance services (OS/DA)
18 on an unbundled basis.

19

20 Q. BRIEFLY DESCRIBE THE METHODS AVAILABLE FOR
21 CUSTOMIZED ROUTING.

22

23 A. The first method of providing customized routing that BellSouth has
24 made available is the Line Class Code (LCC) method. The LCC
25 method makes use of translations and routing capabilities in the end

1 office switch. Availability of customized routing capability using LCCs
2 is offered on a first-come, first-served basis. To date, BellSouth has
3 not denied any request for customized routing based on lack of LCC
4 capacity.

5
6 The second method for providing customized routing is through the
7 use of BellSouth's AIN platform. This method uses a centralized
8 database, which is queried during call processing to determine the
9 CLEC's desired routing for that call. A technical trial of customized
10 routing using BellSouth's AIN platform commenced in Louisiana, in
11 August 1998, and was successfully completed in September 1998. A
12 second trial commenced from May 1999 and successfully completed in
13 August 1999.

14
15 The AIN method for customized routing is available to CLECs in
16 addition to the LCC method. BellSouth has completed work on
17 enhancements to its AIN Service Management System (SMS) which
18 will facilitate CLEC's creating and updating routing information for the
19 CLEC's end user customers. BellSouth has completed end-to-end call
20 through testing (ETET) of this enhancement. The availability of this
21 method was posted on BellSouth's web site
22 (<http://www.interconnection.bellsouth.com/products/UNE/ainscr.pdf>) on
23 October 23, 2000.

24
25 By providing CLECs a choice of methods, BellSouth better enables

1 CLECs to compete based upon their own business plans and priorities.

2

3 Q. IS THERE A LIMITATION ON THE AVAILABILITY OF CUSTOMIZED
4 ROUTING FOR CLECs?

5

6 A. No. Although BellSouth originally believed (based on representations
7 by AT&T and other CLECs) that CLEC demands for customized
8 routing would exhaust available LCCs, demands to date do not
9 suggest imminent risk of exhaustion of LCCs. However, even were
10 that to occur (which I do not believe will in fact occur), the AIN solution
11 discussed below would still be available. The AIN method eliminates
12 any potential exhaust concerns about the LCC method of customized
13 routing.

14

15 Q. ARE BOTH METHODS PROPOSED BY BELLSOUTH AVAILABLE
16 TODAY?

17

18 A. Yes. Both the LCC method and the AIN method are available today.
19 The LCC method is available to CLECs in addition to BellSouth's AIN
20 version and both have been tested and proved workable. If AT&T
21 wants to use the LCC method, it merely needs to order it. Insofar as
22 tests are concerned, AT&T itself participated in cooperative testing of
23 BellSouth's AIN method for customized routing in 1997. Later
24 BellSouth offered to do a trial of the AIN method in Louisiana yet not
25 one CLEC, not even AT&T, showed the slightest interest in being part

1 of that trial. As with the LCC method, if AT&T wants to use the AIN
2 method, it merely needs to order it.

3

4 Q. HOW IS THE AIN METHOD DIFFERENT FROM THE LCC METHOD?

5

6 A. The AIN method also allows use of the common trunk groups between
7 the end office switch and the AIN hub switch to accomplish customized
8 routing for customers served by different end offices subtending a
9 particular AIN hub. In contrast, the LCC solution requires a separate
10 trunk group for each end office. This trunk group may be shared,
11 however, by those CLECs' requesting the same branding or
12 unbranding of their respective end users' OS/DA traffic. Because the
13 AIN method is in essence a database lookup (a function that is not
14 performed with the LCC method), a small amount of post-dialing delay
15 is introduced. The additional post-dialing delay in the AIN solution as
16 compared to the LCC method, which results from querying the
17 database, may be a concern for some CLECs. While testing indicates
18 that the amount of post-dialing delay for customized routing via the AIN
19 method is negligible (between a half-second and one-second), some
20 CLECs may prefer the LCC method on these grounds. By providing
21 CLECs a choice of methods, BellSouth better enables CLECs to
22 compete based upon their own business plans and priorities.

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24 Q. USING THE AIN SOLUTION, WOULD POST-DIALING DELAY
25 DURING CALL SETUP CREATE A CONCERN?

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A. No. First of all, post dialing delay is the time between when the end user finishes dialing and when the customer is informed (via ringing signal, busy tone or the like) of the call's progress. All switching systems take some time to translate the dialed digits, select an appropriate trunk group and the like, and all these functions contribute to post dialing delay. So, post dialing delay is not a consequence of BellSouth's AIN customized routing solution. With the AIN solution, a computer database is queried during call processing to determine the CLEC's preferred routing for a particular end user. This database query takes time and thus adds a small incremental bit of post dialing delay to the overall processing of the call. Second, BellSouth believes the post dialing delay will be only about one second. Third, if AT&T is concerned with even that small an amount of post dialing delay, AT&T can simply request the Line Class Code method and thereby eliminate its concerns for post dialing delay.

Q. WHY DOES BELLSOUTH CHOOSE TO PERFORM THE DATABASE QUERY FROM THE AIN HUB RATHER THAN FROM EACH AND EVERY END OFFICE SWITCH?

A. The AIN method of customized routing allows the use of the AIN "hub" concept, which yields several advantages as follows:

- Allows the use of appropriate AIN "triggers" for all call types rather than only a limited set of call types.

- 1 • Allows even those end office switches that are not AIN-capable
2 to use the AIN customized routing solution.
- 3 • Optimizes the use of shared trunk groups by allowing the
4 carriage of customized routing traffic over common trunk groups
5 between the end office switch and the AIN hub.

6
7 Thus, the AIN hubbing arrangement allows the use of the AIN method
8 in all switches, even those that are not AIN capable. Also, the AIN
9 hubbing arrangement allows some sharing of common trunk groups
10 that other CLECs have stated they prefer.

11

12 Q. HAS BELLSOUTH PROVIDED SUFFICIENT INFORMATION SUCH
13 AS ORDERING INSTRUCTIONS AND SUPPORTING
14 DOCUMENTATION TO AT&T FOR EACH OF THE CUSTOMIZED
15 ROUTING OPTIONS THAT BELLSOUTH WILL PROVIDE?

16

17 A. BellSouth has provided AT&T with a proposed contract language
18 addition for procedures for customized routing. This proposed
19 language will provide specific ordering procedures and documentation
20 as requested by AT&T. If AT&T wants the Line Class Code method of
21 customized routing because AT&T prefers it over the AIN method,
22 AT&T should simply order the Line Class Code method which is and
23 has long been available to it.

24

1 Q. DOES BELLSOUTH HAVE OTHER METHODS BY WHICH CALLS
2 FROM THE END USERS OF CLECS MAY BE BRANDED
3 ACCORDING TO THE CLECS' PREFERENCES?
4

5 A. Yes. In addition to the LCC and AIN customized routing methods,
6 BellSouth recently announced the availability of a functionality referred
7 to as Originating Line Number Screening (OLNS). OLNS provides a
8 means of making information available to the OS/DA platform about
9 the end user originating a telephone call. This information may be
10 used to determine things such as end user's local service provider and
11 that local service provider's branding preferences. OLNS functionality
12 makes originating line information available to the OS/DA platform via
13 centralized databases. In other words, OLNS allows end users' calls
14 to proceed from the end office switches to BellSouth's OS/DA platform
15 over shared trunk groups (that is, a single trunk group between an end
16 office switch and the OS/DA platform carrying multiple service
17 providers' traffic). Once the call arrives at the OS/DA platform, OLNS
18 is used to "look up" the telephone number of the calling party in its
19 database to determine whether and how to brand a call from that
20 particular end user.

21
22 AT&T and MCI have indicated their preference for such a sharing of
23 common transport to avoid their having to acquire dedicated transport
24 from each BellSouth end office. OLNS is method of providing
25 customized branding in addition to the LCC and AIN methods

1 described earlier in this testimony. BellSouth announced the
2 availability of OLNS in Georgia effective December 31, 2000, in a
3 carrier notification on BellSouth's interconnection website dated
4 December 22, 2000. In Kentucky, the availability of OLNS is
5 scheduled for August 2001. CLECs may obtain procedures for
6 ordering OLNS method by contacting their BellSouth account team
7 representative.

8
9 BellSouth stands ready to develop contract language to incorporate
10 these methods in AT&T's interconnection agreement that will facilitate
11 AT&T's use of customized routing and customized branding
12 functionality. However, whether or not AT&T is interested in its doing
13 so, BellSouth provides AT&T and other CLECs with customized routing
14 consistent with the FCC's rules.

15
16 Q. DOES BELLSOUTH HAVE AN OBLIGATION TO ROUTE OS/DA
17 CALLS USING EXISTING TANDEM ARCHITECTURE?

18
19 A. No. BellSouth has no obligation to route AT&T's operator services and
20 directory assistance traffic differently than BellSouth routes its own
21 operator services and directory assistance traffic. I am unaware of any
22 requirement that BellSouth route a CLEC's operator services and
23 directory assistance traffic via tandem. Further, that is not how
24 BellSouth routes its own operator services and directory assistance
25 traffic. Instead, BellSouth uses direct trunk groups between

1 BellSouth's end office switches and BellSouth's operator services and
2 directory assistance platforms. However, upon request BellSouth will
3 provide unbundled tandem switching to AT&T and AT&T can use that
4 capability as it chooses, subject only to the technical capabilities of the
5 tandem switch.

6

7 Q. DOES BELLSOUTH HAVE AN OBLIGATION THAT ITS
8 CUSTOMIZED ROUTING ARCHITECTURE MUST BE FULLY
9 IMPLEMENTED AND AVAILABLE IN EVERY END OFFICE WHERE
10 TECHNICALLY FEASIBLE?

11

12 A. No. It would not be a wise decision for BellSouth to spend money to
13 equip each and every one of its end office switches for customized
14 routing on the chance that a CLEC, such as AT&T, might someday
15 order customized routing. BellSouth has no obligation to spend its
16 money in such a way. If, on the other hand, a CLEC, such as AT&T,
17 requests customized routing in each and every end office switch,
18 BellSouth will gladly fulfill that request.

19

20 Q. CAN BELLSOUTH'S CUSTOMIZED ROUTING SOLUTIONS, WHICH
21 INCLUDE BRANDED AND UNBRANDED RESPONSES, BE
22 PROVISIONED IN A SHORT TIME FRAME?

23

24 A. Yes. BellSouth's customized routing solutions can be provisioned
25 promptly and can handle both branded and unbranded responses to

1 end users' calls. AT&T need only place an order with BellSouth for
2 customized routing and BellSouth will provide it.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes.

7