

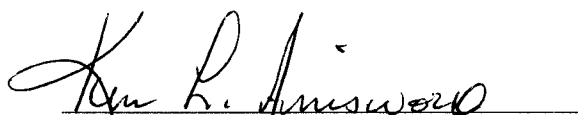
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STATE OF GEORGIA

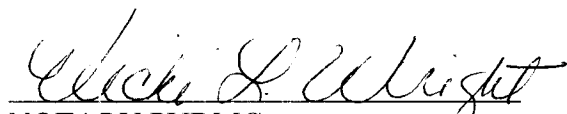
COUNTY OF FULTON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ken L. Ainsworth, BellSouth Telecommunications, Inc., being by me first duly sworn deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in "Investigation Concerning the Propriety of InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996," KY PSC Case No. 2001-105, and if present before the Commission and duly sworn, his testimony would be set forth in the annexed transcript consisting of 7 pages and 1 exhibit(s).

  
\_\_\_\_\_  
Ken L. Ainsworth

SWORN TO AND SUBSCRIBED BEFORE ME this  
17<sup>th</sup> day of September, 2001.

  
\_\_\_\_\_  
NOTARY PUBLIC

Notary Public, Cobb County, Georgia  
My Commission Expires June 19, 2005

1                   BEFORE THE COMMONWEALTH OF KENTUCKY  
2                   PUBLIC SERVICE COMMISSION  
3                   SURREBUTTAL TESTIMONY OF KEN L. AINSWORTH  
4                   ON BEHALF OF  
5                   BELLSOUTH TELECOMMUNICATIONS, INC.  
6                   CASE NO. 2001-105  
7                   September 10, 2001

8  
9  
10 Q.   STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION  
11 WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

12  
13 A.   My name is Ken L. Ainsworth.   My business address is  
14 675 W. Peachtree Street, Atlanta, Georgia 30305.   I am a  
15 Director - Interconnection Operations for BellSouth.   I  
16 have served in my present position since December 1997.

17  
18 Q.   DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

19  
20 A.   Yes.   I have previously filed direct testimony in this  
21 proceeding on May 18, 2001 and rebuttal testimony on  
22 July 30, 2001.

23  
24 Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

1 A. The purpose of my surrebuttal testimony is to respond to  
2 the testimony filed by MCI, AT&T and TCG of OHIO, Inc. in  
3 response to BellSouth's July 30, 2001 filing.

4

5 Q. PLEASE RE-ADDRESS MS. BERGER'S ALLEGATIONS, ON PAGE 2,  
6 REGARDING BELLSOUTH'S NUMBER PORTABILITY ISSUES.

7

8 A. BellSouth's investigation revealed that the problems  
9 associated with the telephone numbers reported have been  
10 resolved and AT&T's customer should be receiving and  
11 sending calls. BellSouth is also continuing to analyze  
12 this problem to determine details.

13

14 Q. PLEASE DISCUSS WHAT EFFECT BELLSOUTH'S MANUAL PROCESSING OF  
15 LSRs HAS ON CONSUMERS?

16

17 A. On page 4 of Ms. Lichtenberg's testimony, she alleges  
18 "BellSouth's manual processing of LSRs harms consumers,"  
19 and further alleges "620 MCI customers have experienced a  
20 loss of dial tone after migration." Again, MCI is  
21 referencing customer experiences, in this case, 620  
22 instances of no dial tone without sufficient analyses to  
23 support their accusation. As further stated, MCI  
24 references only 11 situations that BellSouth agrees were  
25 related to a conversion process. Additionally,  
Ms. Lichtenberg claims all of these are related to the

1 manual process, which has never been substantiated.  
2 Therefore, I cannot agree with any of these assumptions.  
3

4 Q. PLEASE RESPOND TO PAGE 4 OF MS. LICHTENBERG'S TESTIMONY  
5 CONCERNING REJECT RATES?  
6

7 A. Ms. Lichtenberg again makes incorrect assessments of  
8 BellSouth's processes and procedures. She has indicated  
9 that 5,290 LSRs fell out for manual processing. Out of the  
10 18,665 orders submitted by MCI, this would mean that 13,375  
11 LSRs were processed electronically. Of this number, 2,245  
12 LSRs were auto clarified for an auto clarification rate of  
13 16.78%. An auto clarification is when the system sends an  
14 LSR back to the CLEC due to CLEC error before an order is  
15 ever created. Of the 5,290 LSRs that required manual  
16 intervention, BellSouth's records indicates that  
17 BellSouth's LCSC clarified 1,079 of them, or 20.3%. A  
18 manual clarification occurs when the LCSC finds an error or  
19 incomplete information on the LSR. Upon investigation,  
20 using LCSC Call Center data (see Exhibit LCSC-38),  
21 BellSouth has determined that MCI made only 65 calls to the  
22 LCSC in June to question the validity of clarifications.  
23 Of these 65 questioned clarifications, only five of these  
24 were found to be clarified in error for a percentage of  
25 0.18%. In other words, 99.82% of the clarifications were  
caused by MCI error. The few LSRs that are clarified by

1 BellSouth in error are worked by the LCSC promptly when the  
2 issue is brought to BellSouth's attention by MCI.

3  
4 Q. CAN YOU RESPOND TO MS. LICHTENBERG'S TESTIMONY THAT  
5 BELLSOUTH'S EXPLANATIONS REGARDING LOSS OF DIAL TONE  
6 PROBLEMS ARE UNSATISFACTORY?

7  
8 A. On page 5 of Ms. Lichtenberg's testimony, she is incorrect  
9 in her assessment of BellSouth's investigation of the 141  
10 examples provided by MCI. She is correct that out of 141  
11 examples only 11 were loss dial tone issues that could  
12 potentially be attributed to conversion. However, she  
13 insists on placing responsibility for all of MCI's troubles  
14 on the UNE-P conversion process. Ms. Lichtenberg refuses to  
15 accept that 70 of the 141 issues that BellSouth analyzed  
16 were either tested and/or closed with no trouble found,  
17 closed to end user problems or troubles in deregulated  
18 wiring and the 60 had troubles in BellSouth facilities that  
19 would have occurred if the end user had stayed with  
20 BellSouth. Regardless of how persistent Ms. Lichtenberg is  
21 in attempting to attribute these loss dial tone issues to  
22 BellSouth's UNE-P conversion process, this just is not the  
23 case.

1 Q. PLEASE ADDRESS PAGE 5 OF MS. LICHTENBERG'S TESTIMONY  
2 RELATED TO HOW LOSS OF DIAL TONE IS DETERMINED IF A END  
3 USERS' DIAL TONE HAS RETURNED BY THE TIME BELLSOUTH TESTS  
4 THE LINE.

5  
6 A. Ms. Lichtenberg's assumption that no dial tone returns by  
7 the time Bellsouth makes maintenance tests is not consistent  
8 with the facts. First, a large number of no dial tone  
9 reports have occurred days after the conversion activity has  
10 completed. Therefore, there is no conversion correlation to  
11 support Ms. Lichtenberg's assumption nor has any existing  
12 analysis support that assumption. Second, Ms. Lichtenberg  
13 continues to ignore the cases of no dial tone that are found  
14 due to customer premise problems, inside wiring facilities  
15 which certainly cannot be related to conversion activity.

16  
17 Q. IS IT BELLSOUTH'S POLICY TO CANCEL REJECTED LSRs WITHIN 10  
18 DAYS AS ALLEGED ON PAGE 6 OF MS. LICHTENBERG'S TESTIMONY?

19  
20 A. Yes. Currently, a CLEC has ten business days within which  
21 to correct an LSR that has been returned for clarification  
22 and, if the CLEC fails to do so, the LSR is cancelled. The  
23 ten business day period should pose no problem to MCI if  
24 MCI checks regularly to see which LSRs have been returned  
25 for clarification and contacts the LCSC promptly if it  
believes that an LSR has been returned for clarification in

1 error. Allowing MCI and other CLECs to have 30 days to  
2 clarify LSRs would only utilize unnecessary capacity in  
3 BellSouth's systems with no benefit to CLEC or end users.  
4

5 Q. ON PAGES 6-7 OF MR. COLEMAN'S SURREBUTTAL TESTIMONY, HE  
6 AGAIN BRINGS UP THE ISSUE OF AN EMERGENCY MAINTENANCE  
7 SITUATION FOR THE BELL SOUTH LNP GATEWAY. WOULD YOU PLEASE  
8 COMMENT AGAIN ON THIS ISSUE?  
9

10 A. Yes. As indicated in my previous comments on this issue,  
11 BellSouth posted a Carrier Notification, SN91082439, on  
12 June 8, 2001 advising all CLECS that the LNP Gateway would  
13 be unavailable to process Local Service Requests and Number  
14 Portability Administration Center messages from June 8,  
15 2001, at 7:00 p.m. until June 9, 2001 at 9:00 a.m. Eastern  
16 Daylight Time ("EDT"). As previously stated, this  
17 notification should not have prevented AT&T from porting  
18 any of its numbers after 9:00 a.m. EDT on June 9, 2001.  
19 While BellSouth is indeed aware of AT&T's desire to  
20 schedule service on Saturdays, that fact does not change  
21 BellSouth's overall responsibility to perform emergency  
22 maintenance on its LNP Gateway in an expeditious manner.  
23 It would always be better to schedule this type of  
24 maintenance at a time convenient to all parties, but as the  
25 "emergency" in Emergency Maintenance implies, this was work

1           that needed to be completed as soon as possible to avoid  
2           problems for all carriers competing in Kentucky.

3

4   Q.    DOES THIS CONCLUDE YOUR TESTIMONY?

5

6   A.    Yes.

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LCSC-Resale	6/11/01-6-15-01	7AM	8AM	9AM	10AM	11AM	12N	1PM	2Pm	3PM	4PM	5PM	6PM	7PM	Total
<b>Call Reason:</b>															
<b>Question validity of Clarification</b>			4	6	2	5	2	2	2	1	1	1			23
Extended Due Dates					3			1							4
Order Status			2			2			1						5
Checking to validate address				2		2	1	1							6
ERROR on order		1	3	2		2	3	2							13
<b>Clarify in error</b>			2			1									3
MA status															0
Cancel															0
Error corrections/order cpx, csr not updated		3	2			1									6
Denials/Restorals							1								1
Repair Calls					1										1
PIC QUESTIONS			1												1
Mis-directed call				1	1										2
Features left off order that were on LSR			2					1							3
CSR's not correct								3							3
Check why order not complete, past due date			1				1								2
Misc Questions			3	1		2		6	2						14
Disc in Error			2			1									3
rejected pon		1	3	1			2	2				2			11
<b>TOTAL</b>		<b>5</b>	<b>25</b>	<b>13</b>	<b>7</b>	<b>14</b>	<b>12</b>	<b>13</b>	<b>8</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>101</b>

LCSC-Resale	6-18-01/6-22-01	7AM	8AM	9AM	10AM	11AM	12N	1PM	2Pm	3PM	4PM	5PM	6PM	7PM	Total
<b>Call Reason:</b>															
<b>Question validity of Clarification</b>			3	4	2	4	2	2	2	1	1				19
<b>Order Status</b>					2	1	1								4
Disconnected by BS COU not authorized															0
Checking to validate address			1		3		1	2							7
ERROR on order				2		4			2						8
<b>Clarified in error</b>															0
Cancel						1									1
Internal Call															0
Error corrections/order cpx, csr not updated				1			1								2
Denials/Restorals								1							1
Repair Calls								1		1					2
Mis-directed call					3										3
AO status check									1						1
Misc Questions		1	7	1		4	3	4	2						22
Memory Call CFn					1										1
VMS not added								1							1
Escalation				1											1
Check order nt comp past dd							1								1
rejected pon				1	1			1							3
<b>TOTAL</b>		1	11	10	12	10	15	11	11	6	1	0	0	0	77

