



STATE OF GEORGIA     )  
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COUNTY OF FULTON    )

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Alphonso J. Varner, who, being by me first duly sworn deposed and said that:

He is appearing as a witness on behalf of BellSouth Telecommunications, Inc., before the Kentucky Public Service Commission in connection with the Investigation Concerning The Propriety of InterLATA Services By BellSouth Telecommunications, Inc., Pursuant To The Telecommunications Act of 1996 and if present before the Commission and duly sworn, his testimony would be set forth in the annexed testimony consisting of 11 pages and 0 exhibits.

  
Alphonso J. Varner

SWORN TO AND SUBSCRIBED BEFORE ME this  
15<sup>th</sup> day of October, 2001

  
NOTARY PUBLIC



1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 ADDITIONAL SUPPLEMENTAL REBUTTAL TESTIMONY OF  
3 ALPHONSO J. VARNER  
4 BEFORE THE COMMONWEALTH OF KENTUCKY  
5 PUBLIC SERVICE COMMISSION  
6 CASE NO. 2001-105  
7 FILED OCTOBER 16, 2001

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

12  
13 A. My name is Alphonso J. Varner. I am employed by BellSouth as Senior  
14 Director in Interconnection Services. My business address is 675 West  
15 Peachtree Street, Atlanta, Georgia 30375.

16  
17 Q. ARE YOU THE SAME ALPHONSO J. VARNER WHO FILED DIRECT  
18 TESTIMONY IN THIS PROCEEDING?

19  
20 A. Yes, I am.

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22 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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24 A. The purpose of this testimony is to respond to testimony filed by NuVox  
25 Communications witness Mary Campbell on September 20, 2001.

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Q. IN MS. CAMPBELL'S TESTIMONY SHE ALLEGES PROBLEMS THAT NUVOX HAD OBTAINING CLEC-SPECIFIC METRICS RESULTS AND REGIONAL FLOW-THROUGH REPORTS FROM BELL SOUTH. CAN YOU ADDRESS THESE ISSUES?

A. Yes. To respond to this issue appropriately, I must first provide a brief history of NuVox and its business relationship with BellSouth. NuVox's original predecessor is State Communications, which became TriVergent Communications in 2000. Gabriel Communications and TriVergent Communications merged in November 2000 and chose the new company name of NuVox in February 2001. Having gone through a series of mergers and acquisitions, NuVox's combination of predecessor companies includes as many as twelve OCNs and one ACNA. At this time, BellSouth and NuVox have two active Interconnection Agreements (neither under the NuVox company name) and only seven OCNs assigned to billable rates.

To provide CLEC-specific data for individual CLECs, BellSouth must map each CLEC's billable OCNs to a PMAP Wholesale Customer ID and login in order to allow the CLEC to view and download the CLEC-specific performance reports. This assignment of CLEC OCNs to PMAP Wholesale Customer ID is typically accomplished, upon CLEC request and per CLEC instructions, via a form available through the Account Team. Prior to June data, the combination of NuVox and its predecessor

1 companies had a single PMAP ID on file with BellSouth that identified only  
2 one OCN (8672) associated with StateComm.

3  
4 On May 25<sup>th</sup>, Ms. Campbell contacted the NuVox account team and  
5 requested the PMAP login ID and password for NuVox. This information  
6 was provided the same day. On June 5<sup>th</sup>, Ms. Campbell complained to  
7 her account team that she could only view results for OCN 8672. On June  
8 19<sup>th</sup>, Ms. Campbell requested a “key” for the regional Flow-Through report  
9 in order to view the results for TriVergent. BellSouth publishes this  
10 monthly report for all CLECs to view, but disguises individual CLEC results  
11 in the report by removing the company names and OCNs and replacing  
12 them with a randomly generated number, or “key”. Each “key” is unique to  
13 a single OCN, and a unique key is required for each tab of the Flow-  
14 Through report (Aggregate, UNE, Business Resale, Residence Resale  
15 and LNP). Ms. Campbell requested the key for TriVergent, so BellSouth  
16 delivered the “keys” for OCN 2505, internally associated with TriVergent  
17 by the CLEC Interface Group. The “keys” for the April report were  
18 delivered to Ms. Campbell on June 20<sup>th</sup>.

19  
20 Beginning on July 5<sup>th</sup>, Ms. Campbell initiated communications with  
21 BellSouth aimed at sorting through the details associated with NuVox’s  
22 OCNs and the associated PMAP login IDs and Flow-Through reports.  
23 This information exchange continued through August 22<sup>nd</sup> before  
24 BellSouth had a complete list of NuVox’s twelve OCNs and BellSouth was  
25 able to investigate the availability and inclusion in the PMAP system.

1 Seven of the twelve OCNs, as well as the one ACNA provided by Ms.  
2 Campbell, are resident in the PMAP data table that filters transactions for  
3 inclusion in the PMAP reports and the MSS. I should point out that among  
4 the seven included OCNs, all four of NuVox's active OCNs (those with one  
5 or more service request logged since April 2001) are resident in this table  
6 and have been since prior to January 2001. This means that no matter  
7 what the situation was with NuVox having access to its data, the data was  
8 in the aggregate reports BellSouth has presented to this Commission.  
9 The five OCNs currently excluded from PMAP reports and the MSS are  
10 not logged into BellSouth's contract or rate databases (there are no valid  
11 billable rates associated with these OCNs). Accordingly, none of these  
12 OCNs were, or should have been, resident in the PMAP OCN data table.  
13 Further, BellSouth observed no service request activity associated with  
14 these OCNs for the April through July time period studied.

15  
16 The following timeline summarizes the availability and accessibility of  
17 PMAP data to Ms. Campbell using the NuVox login ID:

- 18 (1) Prior to the publication of June results, the NuVox PMAP login ID  
19 allowed the user to view the results reports for OCN 8672 and  
20 2505 (see discussion later in my testimony);
- 21 (2) Following the publication of June results, NuVox was able to view  
22 the results reports and download raw data files for both primary  
23 OCNs, 8672 and 2505;
- 24 (3) With the publication of August results, NuVox will be able to view  
25 results reports and download raw data for any of the twelve NuVox

1 OCNs identified by Ms. Campbell for which BellSouth records  
2 activity.

3 Additionally, the PMAP results reports and raw data associated with  
4 Gabriel Communications (OCN 4890) has been, and will continue to be,  
5 available via a separate PMAP login ID. This arrangement has been  
6 understood and accepted by Ms. Campbell. NuVox may also request  
7 monthly Flow-Through keys for a specific NuVox OCN at any time.

8

9 Q. ON PAGE 3 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT  
10 NUVOX WAS GIVEN ONE USER IDENTIFICATION AND PASSWORD  
11 TO ACCESS NUVOX'S DATA. SHE WAS TOLD THAT ALL RELEVANT  
12 OCNS WOULD BE LISTED UNDER STATECOMM, HOWEVER ONLY  
13 ONE OCN (8672) WAS LISTED. PLEASE ADDRESS.

14

15 A. NuVox only requested one PMAP User ID and there apparently was a  
16 misunderstanding regarding what Ms. Campbell was told. In June,  
17 BellSouth had not received a request for additional OCNs to be applied to  
18 NuVox or appear under the STATECOMM PMAP login on the PMAP  
19 website. Because NuVox now has several OCNs coming from what was  
20 originally three separate companies (StateComm, TriVergent, and  
21 Gabriel), NuVox must request that all OCNs be mapped under one  
22 Wholesale Customer ID to view all data under one PMAP user id, in this  
23 case, STATECOMM. However, NuVox did not request these OCN-to-  
24 Wholesale Customer ID links until August 17, 2001 and, as a result,  
25 NuVox only saw the raw data for one of the twelve OCNs, 8672, on May

1 31, 2001.

2

3 Q. ON PAGE 3 OF HER TESTIMONY, MS. CAMPBELL NOTES THAT ALL  
4 DATA ON THE PMAP WEBSITE IS IDENTIFIED AS STATECOMM 8672.  
5 IS THIS CORRECT?

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7 A. No. Ms. Campbell is mistaken. In the PMAP results reports, NuVox's data  
8 appears under the name "STATECOMM" for two OCNs – StateComm  
9 (OCN 8672) and TriVergent (OCN 2505). Ms. Campbell must be referring  
10 to the raw data on the PMAP website which only contains StateComm  
11 (OCN 8672). As previously discussed, the wholesale customer IDs were  
12 not linked for all NuVox OCNs causing NuVox to only view OCN 8672 in  
13 the raw data on the PMAP Website. Had NuVox informed BellSouth on  
14 the specific OCNs that should be consolidated for CLEC reporting  
15 purposes based on the recent merger and acquisition, BellSouth would  
16 have updated the necessary databases to reflect the changes and enable  
17 NuVox to view all of their data. Again, NuVox has to request what it wants  
18 instead of complaining about BellSouth's lack of clairvoyance.

19

20 Q. ON PAGE 4, MS. CAMPBELL ALLEGES A DISCREPANCY BETWEEN  
21 THE VOLUME OF LSRS THEY SUBMITTED IN APRIL 2001 VS THE  
22 NUMBER OF LSRS SHOWING IN NUVOX'S RECORDS.  
23 SPECIFICALLY, BELL SOUTH'S COUNT IN APRIL IS 1,942 AND NUVOX  
24 SAYS THEY SUBMITTED 616. PLEASE ADDRESS?

25

1 A. This is a symptom of the same problem created by NuVox's failure to  
2 administer its own OCNs. The 1,942 LSRs reported by BellSouth for  
3 NuVox are under OCN 8672, StateComm. This data does not include the  
4 XX LSRs for TriVergent, OCN 2505. If NuVox alleges further LSR volume  
5 discrepancies on the 1,942 LSRs for OCN 8672 and XX LSRs for OCN  
6 2505, additional verification will be required. The PONs for the 616 LSRs  
7 stated by NuVox would be required to conduct any further investigation.  
8 NuVox has not provided the listing of PONs from their internal records for  
9 the 616 LSRs to permit such investigation.

10

11 Q. ON PAGES 4-5 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT  
12 NUVOX IS NOT GETTING A COMPLETE SET OF KEYS SO THAT  
13 THEY ARE ABLE TO LOOK UP ALL RELATED DATA IN THE FLOW-  
14 THROUGH REPORT. WHY IS THIS?

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16 A. As previously discussed, BellSouth accurately provided Ms. Campbell with  
17 the Flow-Through Report key for the company that she requested,  
18 TriVergent (OCN 2505). Ms. Campbell failed to request the Flow-Through  
19 Report Key for StateComm (OCN 8672). For the April 2001 Flow-Through  
20 Report, BellSouth only provided NuVox with the TriVergent (OCN 2505)  
21 key as Ms. Campbell requested. For security reasons, BellSouth only  
22 distributes Flow-Through Report keys when the key is requested by the  
23 CLEC. Keys are distributed based on the specific OCNs requested by the  
24 CLEC. Without the request for a Flow-Through Report Key for OCN 8672  
25 from Ms. Campbell, she would not have been able to view all of



1 StateComm's data. Again, the merger and acquisition activity surrounding  
2 NuVox and the specific nature of Ms. Campbell's request has prevented  
3 NuVox from receiving all relevant data.  
4

5 Q. ON PAGE 5 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT THE  
6 FLOW-THROUGH REPORT FOR APRIL 2001 WAS INCOMPLETE,  
7 REFLECTING ONLY A FRACTION OF THE ORDERS SUBMITTED BY  
8 NUVOX AND NONE OF THE ORDERS FOR UNES AND RELATED  
9 SERVICES SUBMITTED UNDER OCN 2505 WERE INCLUDED.  
10 PLEASE EXPLAIN.  
11

12 A. Ms. Campbell is incorrect. BellSouth's April 2001 Flow-Through Report is  
13 complete and contains all orders submitted by NuVox under OCN 2505,  
14 including UNEs. BellSouth provided NuVox with the April Flow-Through  
15 keys for OCN 2505 (TriVergent) on June 20, 2001, as they requested, and  
16 the UNE orders are appropriately reflected in this report. TriVergent (OCN  
17 2505) submitted a total of XX UNE LSRs via BellSouth's electronic  
18 interfaces in April. Futhermore, NuVox did not request the key for OCN  
19 8672, StateComm, which had 1,942 LSRs submitted under that particular  
20 OCN. Without Flow-Through Report Keys for OCN 2505 and 8672,  
21 NuVox would not have been able to view all of the orders they submitted.  
22

23 Q. ON PAGE 5, MS. CAMPBELL CLAIMS THAT BELLSOUTH TOLD  
24 NUVOX THERE WERE NO PMAP REPORTS SHOWING OCN 2505 IN  
25 APRIL 2001. WHY IS THIS?

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A. Having not been privy to the discussions between Ms. Campbell and the BellSouth Account Team, I can only state what was available for NuVox under their PMAP ID for April 2001. The PMAP results reports displayed data for both OCN 8672 and 2505, while the PMAP raw data only displayed data for OCN 8672 as previously noted in my testimony. If the BellSouth Account Team representative was looking in PMAP raw data and not the PMAP results reports, it could have understandably caused confusion. Ms. Campbell may have misunderstood when the account team explained this to her.

Q. ON PAGE 5 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT THE PMAP REPORTS ONLY INCLUDE DATA ON NUVOX'S RESALE BUSINESS. PLEASE EXPLAIN.

A. Again, Ms. Campbell is wrong. The BellSouth PMAP reports do include all aspects of NuVox's business. As a result of NuVox's recent merger and acquisitions, the PMAP raw data found on the PMAP website only displayed data under OCN 8672, StateComm. Since all of NuVox's UNE and LNP business falls under OCN 2505 (Trivergent) and not OCN 8672, NuVox would not have been able to view this data in the PMAP raw data under the STATECOMM PMAP User ID login because Trivergent (OCN 2505) was not linked to StateComm at that time. NuVox also only provided BellSouth with a complete listing of OCNs that should be consolidated based on NuVox's merger and acquisition activities for CLEC

1 reporting purposes and PMAP User IDs on August 17, 2001. BellSouth  
2 has updated the necessary databases to reflect the changes and enable  
3 NuVox to view all of their raw data on the PMAP website with August data.  
4

5 Q. ON PAGE 5, MS. CAMPBELL STATES THAT PMAP IS USELESS TO  
6 NUVOX AND NUVOX HAS NO MEANS TO EVALUATE BELLSOUTH'S  
7 PERFORMANCE. PLEASE RESPOND.  
8

9 A. Ms. Campbell is incorrect. NuVox is primarily responsible for the fact that  
10 PMAP does not reflect all of the mergers and acquisitions that NuVox has  
11 undergone. Thus, not having all the appropriate OCN's mapped to NuVox  
12 on the BellSouth website does not render PMAP useless. It simply means  
13 that appropriate lines of communications should be implemented by the  
14 NuVox to more expeditiously keep BellSouth informed of changes to their  
15 business identities. Per the PMAP User's Guide, each CLEC is  
16 responsible for contacting their individual BellSouth Account Team  
17 representative with updates on their account and the addition of an OCN  
18 for PMAP reporting purposes. BellSouth did not receive a complete listing  
19 of NuVox OCNs and desired OCN grouping for PMAP User IDs until  
20 August 17, 2001 after BellSouth initiated verification. BellSouth has  
21 updated the necessary databases to reflect the changes and all NuVox  
22 data will be available on the PMAP website with the August data.  
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24 Q. MS. CAMPBELL CLAIMS ON PAGE 6 THAT PMAP DATA IS  
25 INCOMPLETE AND UNRELIABLE. IS MS. CAMPBELL'S ASSERTION

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CORRECT?

A. Ms. Campbell's claim is completely unfounded. Her testimony, as I have shown, provides no basis for her claim. To the extent she is relying on other CLECs testimony, her claim is likewise meritless. I have already discussed the accuracy and validity of BellSouth's PMAP data in great detail in my response to other witnesses earlier in my testimony.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.