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PUBLIC SERVICE
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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
Application of BellSouth)
Telecommunications, Inc. to Provide) CASE NO. 2001-105
In-Region InterLATA Services)
Pursuant to Section 271 of the)
Telecommunications Act of 1996)

PREFILED TESTIMONY
OF
MARY H. CAMPBELL
ON BEHALF OF NUVOX COMMUNICATIONS, INC

Q. Please state your name and business address.

A. My name is Mary Haynsworth Campbell and my business address is 301 North Main Street, Suite 5000, Greenville SC 29601.

Q: By whom are you employed and in what capacity?

A: I am the Tariff Manager for NuVox Communications, Inc. ("NuVox").

Q. What is NuVox Communications?

A. NuVox Communications, Inc. ("NuVox") is a facilities-based integrated communications and applications services provider focusing on small and medium-sized businesses. The company is the result of the November 1, 2000 merger of Gabriel Communications, Inc. ("Gabriel"), a Competitive Local Exchange Carrier ("CLEC") headquartered in St. Louis, Missouri and Trivergent Communications, Inc. ("TriVergent"), headquartered in Greenville, South Carolina.

TriVergent was founded in November of 1997 and began offering local and long distance telecommunications services via resale to residential and small business customers in Kentucky in May of 1998. In May of 1999, we began the process of deploying our own switching facilities for the migration of our customer base onto these facilities.

Following the completion of the merger between Gabriel and Trivergent, the combined company chose NuVox Communications as its new operating name. The Southeastern headquarters for the company are located in Greenville, South Carolina. NuVox currently employs approximately 1100 employees. NuVox currently provides local and long distance voice services, dedicated high speed Internet access, digital subscriber line

access, and web hosting services to business and residential customers in 30 markets in 13 states across the Southeast and Midwest.

In Kentucky, NuVox is actively marketing to both residential and business customers in Louisville, Lexington and surrounding areas. NuVox has interconnection agreements with both BellSouth and Verizon in Kentucky. The Company currently has approximately 120,000 access lines company-wide, and approximately 1800 access lines in Kentucky.

Q: Please describe your background and experience in the telecommunications industry.

A: I have a B.S. degree from the College of Charleston in Urban Administration and City Planning. I have been employed in the telecommunications industry for seven years. I have held various regulatory positions with LCI, CTG, Qwest Communications and NuVox.

Q: What is the purpose of your testimony?

A: My testimony relates to checklist item 2 – access to unbundled network elements. The purpose of my testimony is to outline NuVox's concerns about the integrity of the data that underlie BellSouth's performance reporting. My testimony describes a fatal flaw in BellSouth's performance data for NuVox which makes the data unreliable. In short, the BellSouth performance reports do not include data for all of NuVox's operations and, thus, the data is incomplete.

Q: What are your responsibilities at NuVox regarding BellSouth's performance data?

A: My responsibilities at NuVox include handling special projects for company management. In late May 2001, I was asked to review data posted on BellSouth's

Performance Measurement Analysis Platform ("PMAP") regarding BellSouth's performance.

Q: When did you begin looking at this data?

On May 25, 2001, I contacted NuVox's BellSouth account representative, Scott Christian to obtain the required user identification and password to access NuVox's data on the PMAP website. I told him the data could be under any of several company names – NuVox, TriVergent, State Communications or Gabriel Communications. State Communications is the name of NuVox's original predecessor corporation. State Communications later became TriVergent Communications which recently merged with Gabriel Communications. BellSouth provided me a single user identification and password to access all of NuVox's data.

Q: How was the data displayed when you logged on to the PMAP website?

A: On May 31, 2001, I logged on to the website and saw that the reports listed the company name as STATECOMM with the operating company number ("OCN") 8672. OCNs are assigned by National Exchange Company Association and are required by BellSouth to process orders for resold services and for unbundled network elements ("UNEs") used in combination with NuVox's own facilities to provide telecommunications services.

Q: Does NuVox have more than one OCN?

A: Yes. NuVox has several OCNs. Among them are OCN 8672 assigned for resale orders and OCN 2505 assigned for ordering UNEs and related services for customers served on NuVox's facilities. When I saw that the PMAP website listed only the name STATECOMM and the 8672 OCN, I was concerned that the PMAP data was not complete.

Q: Did you ask BellSouth whether the PMAP data for NuVox was complete?

A: Yes. On or about June 5, 2001 I spoke with Jan Strain, a BellSouth PMAP Administrator, and told her of my concern. She assured me that she had checked all the names Mr. Christian had given her for NuVox. She told me that our company's data was under the name STATECOMM and that there was no additional data under any of the other company names.

Q: What did your review of the PMAP data reveal?

A: After my conversation with Ms. Strain, I reviewed the PMAP data for April and May 2001 and determined that there were large discrepancies between NuVox internal data and the BellSouth PMAP data. For instance, the NuVox internal data reflect that NuVox submitted 616 local service requests to BellSouth throughout the region during the month of April 2001. BellSouth's count of NuVox local service requests as shown on several PMAP reports was 1942 for April.

Q: Did you do anything else?

A: Yes. In a further effort to validate BellSouth's data, I attempted to compare BellSouth's service order flow-through data with NuVox internal data. BellSouth publishes order flow-through data for all CLECs but substitutes the CLEC's name with a key number to protect the confidentiality of individual CLECs' data. Therefore, it was necessary for me to obtain the key number assigned by BellSouth to NuVox flow-through data. On June 19, 2001, I requested the flow-through report key for our company from Jan Strain. She forwarded my request to Debbie Gardner of BellSouth. On June 20, 2001, Ms. Gardner forwarded me the key for April data which she identified as TriVergent (OCN 2505). In her e-mail, Ms. Strain stated that TriVergent data "is shown in PMAP as State Comm." See Campbell Exhibit 1. However, all of the data on the PMAP website is identified as STATECOM OCN 8672.

Q: What did your review of the flow-through data reveal?

A. When I reviewed the BellSouth flow-through data for NuVox for April under the key number I discovered that the information was still incomplete and reflected only a fraction of the orders submitted to BellSouth by NuVox for this period. None of the orders for UNEs and related services submitted under OCN 2505 were included.

Q: What did you do next?

A: On July 5, 2001 I telephoned Scott Christian and informed him of this discrepancy by voice mail. He returned my call the same day and told me that there should be data under OCN 2505 (UNEs) as well as OCN 8672 (resale). However, he told me that BellSouth did not find any PMAP reports with NuVox's OCN for unbundled network elements - 2505. Mr. Christian's statement contradicted what Ms. Strain told me in early June when I first expressed my concern at seeing only the STATECOMM company name on the PMAP website.

Q: What is the significance of Mr. Christian's statement to you?

A: It is apparent now that the PMAP reports which BellSouth purported to include all of NuVox data, in fact, do not. The PMAP reports include only data on NuVox's resale business. Since January 2001, resale has represented only approximately one third of NuVox's orders to BellSouth. BellSouth's PMAP data for NuVox is incomplete and is an inaccurate reflection of BellSouth's performance. The PMAP data for other CLECs may likewise be incomplete.

Q: Does NuVox currently have any means to evaluate BellSouth's performance?

A. No. The PMAP data bears no resemblance to NuVox's actual experience with BellSouth. It includes only a fraction of NuVox activity. The PMAP data is completely useless to NuVox. As a result of this experience, NuVox has no confidence in the PMAP data.

Q: What is the significance of this experience for the Commission?

A: The Commission cannot base its evaluation of BellSouth's performance relative to NuVox on the PMAP data. The data is incomplete and unreliable. In addition, the facts described here suggest that the data in BellSouth's Kentucky State Summary for CLEC aggregate data is incomplete and therefore unreliable.

Q: Does this conclude your testimony?

A: Yes.

From: "Gardner, Deborah L" <Deborah.Gardner@bellsouth.com>
To: "Strain, Jan P." <JanP.Strain@bridge.bellsouth.com>; "Gardner, Deborah L" <Deborah.Gardner@bellsouth.com>
Cc: <MCampbell@nuvox.com>; "Christian, Scott" <Scott.Christian@bridge.bellsouth.com>
Sent: Wednesday, June 20, 2001 10:35 AM
Subject: RE: Percent Flow Through Report

> Mary,
>
> Here are your flow thru keys for April, 2001.
>
> April
> LNP Flow Through Key for Aggregate and Fatal Rejects
> #4 Trivergent (OCN 2505)
>
> Flow Thru Aggregate
> #35 Trivergent 2505
>
> UNE
> #20 Trivergent 2505
>
> Suzy Sherwood will send you the keys for May after the data is posted.
She has also put you on her list to send these every month. Let us know if
you have questions.
>
> Thanks,
> Debbie Gardner
>
>
>
>
>
>
> -----Original Message-----
> From: JanP.Strain@bridge.bellsouth.com
> [mailto:JanP.Strain@bridge.bellsouth.com]
> Sent: Tuesday, June 19, 2001 2:47 PM
> To: Deborah.Gardner@bellsouth.com
> Cc: MaryCampbell@nuvox.com; Scott.Christian@bridge.bellsouth.com
> Subject: Percent Flow Through Report
>

- >
- > Debbie,
- >
- > As you and I discussed, please supply Mary with Trivergent's Company
Number for
- > the Percent Flow Through Service Requests Report for April and May. I
realize
- > that the May report will not post until the 21st and the web will be down
on
- > Wednesday. Trivergent is shown in PMAP as State Comm.
- >
- > Mary Campbell's telephone number is 864/967-4113.
- >
- > Should you have any questions, please call me.
- >
- > Thanks for your assistance.
- >
- > Jan
- >

From: Gardner, Deborah L [Deborah.Gardner@bellsouth.com]
Sent: Wednesday, August 22, 2001 9:42 AM
To: 'Campbell, Mary'
Subject: RE: PMAP Profile

Docket No. P-55, Sub 1022
Exhibit MHC-2
Page 1 of 1

Mary,

We have all of these in our systems except 2507, 2508, 2509, and 2510. We will add these September 1st and begin collecting data for August to be posted September 21st. Your new accounts are:

Name	UserID	Password	Company
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NuVox
Gabriel Communications

Suzy will be sending you your Flow Thru Keys for July data towards the end of the week. If you have any questions, please give me a call.

Thanks,
Debbie
404-927-2175

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

From: Campbell, Mary [mailto:MCampbell@nuvox.com]
Sent: Monday, August 20, 2001 8:52 AM
To: 'Gardner, Deborah L'
Subject: RE: PMAP Profile

Hey, When will the file be updated?? And I have the aggregate reports from the last months do any of these OCNs have key numbers so I can look at the data? If not just let me know.

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

From: Gardner, Deborah L [mailto:Deborah.Gardner@bellsouth.com]
Sent: Friday, August 17, 2001 1:37 PM
To: Campbell, Mary
Cc: Christian, Scott
Subject: FW: PMAP Profile

Mary,

Please verify below.

> -----Original Message-----

> **From:** Gardner, Deborah L
> **Sent:** Thursday, August 16, 2001 3:41 PM
> **To:** Christian, Scott
> **Cc:** Porter, Phillip
> **Subject:** PMAP Profile

>
> Scott,

> Please confirm with NuVox how exactly they'd like to see their data in PMAP. Currently we have on file only one PMAP password request (RF-1213) for State Communications for OCN 8672 (resale) and 2505 (LNP). Here is a list of 5 possible OCN's and 1 ACNA that they will need to tell us to add. We can add them and then change their name in PMAP to NuVox. Also, do they want Gabriel Communications to be included in the NuVox login? If they'd like to keep them separate, we can issue a separate UserID and Login. Just let us know and put it on the form.

>
> OCN ACNA Gabriel Communications
> 2506 (ODUF/ADUF) SAU 4890
> 2620 (911/T1 Trunks)
> 2621 (ODUF/ADUF)

> ~~3799~~

>
>
> Thanks,
> Debbie Gardner
> 404-927-2175