

Mike Knell, dba JTR Publishing,

Complainant,

vs.

Pacific Bell Telephone Company and AT&T
Communications of California, Inc.,

Defendants.

Case 01-07-034
(Filed July 25, 2001)

**DIRECT TESTIMONY OF GINGER L. HENRY
ON BEHALF OF PACIFIC BELL TELEPHONE COMPANY**

Q1. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

A1. My name is Ginger L. Henry. My business address is 2600 Camino Ramon, Room 3S302, San Ramon, California.

Q2. BY WHOM ARE YOU EMPLOYED AND WHAT ARE YOUR CURRENT DUTIES?

A2. I am currently employed by SBC Pacific Bell Telephone Company ("Pacific Bell") and SBC Nevada Bell Telephone Company ("Nevada Bell") as the General Manager, Local Wholesale Operations. In this position, I am responsible for planning and implementing all Local Service Center Operations' new products, processes, training, methods and procedures.

Q3. PLEASE PROVIDE A BRIEF HISTORY OF YOUR PRIOR WORK EXPERIENCE WITH SBC PACIFIC BELL.

A3. I have held numerous management positions in Pacific Bell and SBC Business Marketing, Industry Marketing, and the Network Services organizations, many of those positions in standardization of customer service quality and process assurance.

Q4. ARE YOU FAMILIAR WITH THE COMPLAINT OF MIKE KNELL?

A4. Yes. Mr. Knell filed a Complaint against Pacific Bell and AT&T in July of 2001 in which he alleged service outages and directory listings for two of his telephone numbers (925-485-0461 and 925-846-3642). Since that time, he

has amended his original complaint to include three other telephone numbers (925-462-3619, 925-462-5093, and 925-455-4975.)

Q5. WHAT IS THE CURRENT STATUS OF THE TELEPHONE NUMBERS IN MR. KNELL'S COMPLAINT?

A5. Telephone numbers (925) 846-3642 and (925) 462-3619 are services Pacific Bell is currently reselling to AT&T. AT&T is a wholesale customer of Pacific Bell for these numbers and, in turn, Mr. Knell is AT&T's customer for these two numbers. Telephone numbers (925) 462-5093 and (925) 485-0461 were completely ported out of Pacific Bell's network and ported into AT&T's network. Therefore, Pacific Bell has no relationship with either AT&T or Mr. Knell for these numbers. Mr. Knell is a direct, retail customer of Pacific Bell for (925) 455-4975.

Q6. WHAT IS YOUR ROLE IN THIS PROCEEDING?

A6. My role is to explain Pacific Bell's responsibilities as a provider of wholesale service to AT&T.

Q7. WHAT DOCUMENTS GOVERN PACIFIC BELL'S RESPONSIBILITIES TO ITS WHOLESAL CUSTOMERS?

A7. Pacific's responsibilities for old services are outlined in Resale Tariff, Schedule Cal. P.U.C. No. 175-T, Section 18, "Services for Resale" ("Resale Tariff"). Pacific's obligations to facilities-based providers are detailed in the

individual Interconnection Agreements filed with the California Public Utilities Commission.

Q8. UNDER PACIFIC BELL'S RESALE TARIFF AND/OR INTERCONNECTION AGREEMENT WHO IS PACIFIC'S CUSTOMER OF RECORD IN MR. KNELL'S CASE?

A8. AT&T is Pacific Bell's customer of record for telephone numbers (925) 846-3642 and (925) 462-3619. In turn, Mr. Knell is AT&T's customer of record for those numbers, as well as the others cited above, with the exception of (925) 455-4975. For that number, Mr. Knell is Pacific Bell's customer. Pacific Bell has no relationship or obligation to Mr. Knell for the other four telephone numbers Mr. Knell currently subscribes to with AT&T.

Q9. WHEN DID MR. KNELL CEASE TO BE PACIFIC BELL'S CUSTOMER AT HIS PLACE OF RESIDENCE THAT HE LISTED IN HIS COMPLAINT?

A9. Mr. Knell ceased to be Pacific Bell's customer at that location in April of 1997; AT&T apparently obtained authorization from Mr. Knell to become his telephone provider and migrated Mr. Knell's telephone service from Pacific Bell to AT&T. Attachment A to my testimony provides a chronology of Mr. Knell's telephone numbers.

Q10. WHAT GENERAL OBLIGATIONS DOES PACIFIC BELL HAVE TO ITS WHOLESALE CUSTOMERS – IN THIS CASE, TO AT&T?

A10. Pacific Bell must provide wholesale customers with pre-ordering, ordering, provisioning, maintenance, and billing services.

Q11. WHO IS CURRENTLY RESPONSIBLE FOR REPAIRING AND MAINTAINING MR. KNELL'S TELEPHONE LINES?

A11. Pacific is responsible for keeping its portion of the network in operating order. Pacific's Local Operations Center receives requests for repair and/or maintenance from its wholesale customers and must process those requests in a timely manner. As Mr. Alex's testimony shows, Pacific responded to all requests for service that it received from AT&T on behalf of Mr. Knell in a timely manner.

Q12. SO IF MR. KNELL HAD SERVICE PROBLEMS ON THE FOUR TELEPHONE LINES SERVING THE RESIDENCE LISTED IN HIS AMENDED COMPLAINT, HE WOULD BE REQUIRED TO TALK TO HIS SERVICE PROVIDER AT&T WHO, IN TURN, WOULD THEN CONTACT PACIFIC BELL ON HIS BEHALF?

A12. Yes. Pacific does not handle or discuss repair requests or problems with a competitor's end user. In fact, if an end user contacts Pacific's repair bureau directly and inputs a telephone number that does not belong to Pacific, the

end user is advised to contact his or her Competitive Local Exchange Carrier's ("CLEC") repair bureau directly.

Pacific Bell's Resale Tariff Section 18.1.4 (H) states:

A CLC Reseller shall be responsible for interfacing with the Utility [SBC Pacific Bell] on behalf of its end users for service needs, including, without limitation, sales, service design, order taking, provisioning, change orders, training, maintenance, trouble reports, repair, post-sale servicing, billing collection, adjustments and inquiry. ... Except as may be provided under contract, contact from an end user regarding any Utility Resale Service will be referred by the Utility to the CLC Reseller.

Q13. HOW DO CLEC RESELLERS NOTIFY PACIFIC OF TROUBLE ON AN END USER'S LINE?

A13. CLEC resellers submit trouble reports for their end users to Pacific Bell's Local Operations Center ("LOC"). Before the CLEC reseller contacts the LOC, the CLEC generally performs tests with its end users to isolate the source of the trouble. If a CLEC cannot find the source of the trouble, or believes that the trouble may be within Pacific Bell's network, the CLEC places a trouble ticket with Pacific Bell's LOC.

Q14. AFTER THE LOC RECEIVES THE TROUBLE TICKET, WHAT HAPPENS?

A14. A maintenance administrator ("MA") in the LOC creates a trouble ticket, performs screening tests, and provides the ticket information to the CLEC for tracking purposes. The LOC performs screening and testing to determine where in the network the trouble is located and whether a technician is

required to repair the service. Once the trouble is cleared, the LOC is informed and the trouble ticket is closed. The MA then contacts the LOC administrator who contacts the CLEC. The CLEC is then responsible for contacting its customer to ensure the line is working satisfactorily. Specific details related to Mr. Knell's telephone service are provided in the Direct Testimony of Mr. Alex.

Q15. DOES THIS CONCLUDE YOUR TESTIMONY?

A15. Yes.

ATTACHMENT A

CHRONOLOGY OF PURCHASE ORDERS RECEIVED IN THE LOCAL SERVICE CENTER

The following section describes when purchase orders were received at the Pacific Bell's Local Service Center for each of Complainant's telephone numbers that were resold to AT&T:

925-462-3619 - Purchase order number A970MESAAZ00646 was received on 4/15/97. The work to migrate the service over to AT&T on a resale basis was completed 4/16/97. A final bill closing Mr. Knell's retail account was issued on 4/23/97 with a revised final bill issued on 5/13/97

925-846-3642 - Purchase order number A970MESAAZ00646 was received on 4/15/97. The work to migrate the service over to AT&T on a resale basis was completed 4/16/97.

925-462-5093 - Purchase order number N00669288027-0002 was received on 4/7/97. The work to migrate the service over to AT&T on a resale basis was completed on 4/24/97.

A second purchase order, request #TRIVALLEYRR7297, was received from AT&T on 11/13/99. On this purchase order, AT&T requested to port Mr. Knell's telephone number out of Pacific Bell's network and onto AT&T's facility-based network. The work to port this telephone number was completed on 11/24/99.

925-485-0461 - Purchase order number N0669288027-001 was received on 4/7/97. The work to migrate the service over to AT&T on a resale basis was completed on 4/23/97.

A second purchase order, request #TRIVALLEYRR7298, was received from AT&T on 11/13/99. As with telephone number 925-462-5093, AT&T requested to port Mr. Knell's telephone number out of Pacific Bell's network and onto AT&T's facility based network. The work to port this telephone number was completed on 11/24/99.