

AFFIDAVIT

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 Kenneth L. Ainsworth, who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in Case No. 2003-00379, Review of Federal Communications Commission's Triennial Review Order Regarding Unbundling Requirements for Individual Network Elements, and if present before the Commission and duly sworn, his surrebuttal testimony would be set forth in the annexed testimony consisting of 19 pages and 1 exhibits.



Kenneth L. Ainsworth

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 8th DAY OF APRIL, 2004



Notary Public

Evelyn Parks Peters
Notary Public, Newton County, Georgia
My Commission Expires May 12, 2007

1 BELL SOUTH TELECOMMUNICATIONS, INC.

2 SURREBUTTAL TESTIMONY OF KENNETH L. AINSWORTH

3 BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

4 DOCKET NO. 2003-00379

5 APRIL 13, 2004

6

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

10

11 A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree
12 Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations
13 for BellSouth.

14

15 Q. ARE YOU THE SAME KEN L. AINSWORTH WHO EARLIER FILED DIRECT
16 AND REBUTTAL TESTIMONY IN THIS DOCKET?

17

18 A. Yes.

19

20 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY BEING
21 FILED TODAY?

22

23 A. I will respond to certain hot cut issues raised in the rebuttal testimonies of Mr.
24 James D. Webber and Ms. Sherry Lichtenberg on behalf of MCI, and Mr. Mark
25 David Van de Water on behalf of AT&T.

1 **The Hot Cut Process – General Issues**

2
3 Q. THE COMPETITIVE LOCAL EXCHANGE CARRIERS (“CLECS”) HAVE
4 CRITICIZED BELL SOUTH FOR BEING UNWILLING TO COLLABORATE (See
5 Van de Water, at 8; Lichtenberg, at 10). IS THIS CRITICISM MERITORIOUS?
6

7 A. No. BellSouth has always stated that it was willing to consider specific process
8 changes proposed by the CLECs. While the CLECs have chosen to make these
9 suggestions via this docket as opposed to through operational channels,
10 BellSouth has listened. In an effort to be responsive, BellSouth has agreed to
11 make the following enhancements to its already effective and seamless batch hot
12 cut process:

- 13 • Batch process will be applicable to CLEC-to-CLEC hot cuts (for example,
14 migrations from a UNE-P arrangement for CLEC “A” to a UNE-L
15 arrangement for CLEC “B”);
- 16 • Batch process will be applicable to CLEC-to-CLEC hot cuts (for example,
17 hot cuts from a UNE-L arrangement for CLEC “A” to a UNE-L
18 arrangement for CLEC “B”) at such time as necessary systems changes
19 can be made;
- 20 • Batch process will guarantee that an end user’s account will all be cut on
21 the same day;
- 22 • Batch process will include after-hours and Saturday hot cuts;
- 23 • Batch process will guarantee a four-hour time window for coordinated hot
24 cuts;
- 25 • Batch process will include a timely throw-back process if requested by the

1 CLEC in the event of problems arising during the provisioning process;

- 2 • BellSouth will implement a web-based communication system for non-
- 3 coordinated hot cuts similar to that implemented by Verizon and SBC;
- 4 • BellSouth will reduce the 14-day provisioning interval in the batch process
- 5 to eight (8) days in systems release 16.0 currently scheduled for July of
- 6 this year;
- 7 • BellSouth will implement a scheduling tool similar to SBC's;
- 8 • Batch process will include hot cuts to DS0 Enhanced Extended Links
- 9 ("EELs").

10
11 These enhancements to BellSouth's already-compliant Batch Hot Cut Process
12 should address virtually all of the CLEC's alleged criticisms of the process.
13 Exhibit KLA-8, filed with my rebuttal testimony, is the UNE-P to UNE-L Bulk
14 Migration CLEC Information Package, which was updated and posted to the web
15 on February 18, 2004. It contains many of the enhancements I just mentioned.

16
17 Q. MS. LICHTENBERG ALLEGES, ON PAGE 10 OF HER TESTIMONY, THAT
18 "MCI WOULD PREFER A PROCESS THAT PROVIDES STANDARD DUE
19 DATES AND ALLOWS THE ISSUANCE OF INDIVIDUAL LSRs, RATHER THAN
20 THE CREATION OF A MANUAL SPREADSHEET AND A NEGOTIATION
21 SESSION WITH A PROJECT MANAGER." MS. LICHTENBERG FURTHER
22 STATES THAT BELL SOUTH "CONTINUES TO REFUSE TO COLLABORATE
23 WITH CLECS TO DEVELOP A TRUE BATCH HOT CUT PROCESS." PLEASE
24 COMMENT.

1 A. This testimony demonstrates that Ms. Lichtenberg does not know what she
2 wants. On the one hand, she criticizes BellSouth for failing to develop what she
3 refers to as a “true” batch hot cut process, but on the other hand argues that
4 BellSouth must provide standard due dates with individual Local Service
5 Requests (“LSRs”), exactly what the individual hot cut process provides. This
6 type of contradiction, coupled with the fact that CLECs have stated that they
7 would not support *any* manual hot cut process, is the reason BellSouth has
8 declined to engage in formal collaborations. The CLECs view collaboration as a
9 means by which to delay a switching impairment decision, not as a means by
10 which to improve the process.

11
12 However, as my testimony demonstrates, BellSouth is listening and considering
13 all inputs from CLECs and commissions in various workshops to enhance the
14 currently compliant process. BellSouth is incorporating these suggestions for
15 tools and additional processes into current processes when they are reasonable
16 and enhance the existing process.

17
18 Q. MR. VAN DE WATER, ON PAGE 2 OF HIS TESTIMONY, ARGUES THAT
19 BELL SOUTH HAS NOT COMPLIED WITH THE TRIENNIAL REVIEW ORDER
20 (“TRO”) BECAUSE IT HAS NOT ADOPTED A BATCH HOT CUT PROCESS.
21 PLEASE ADDRESS.

22
23 A. As with most of the CLEC testimony, AT&T is quick to call BellSouth’s process
24 non-compliant, but slow to provide technically feasible alternatives. BellSouth
25 does not dispute that the provisioning portion of its Batch Hot Cut process is

1 identical to the individual process – the use of the provisioning process was
2 deliberate. BellSouth took a proven, tested and approved process and overlaid a
3 bulk ordering mechanism and project management to create a seamless, end-to-
4 end process that will allow BellSouth to efficiently migrate thousands of UNE-P
5 customers to UNE-L. There are ordering and provisioning efficiencies in the
6 batch process and thereby it complies with the TRO.
7

8 **The Batch Hot Cut Process – Specific Issues**

9 10 ***Hot Cuts for EELs***

11
12 Q. ON PAGES 2 AND 6 OF HIS TESTIMONY, MR. WEBBER INDICATES THAT
13 “NEITHER BELL SOUTH’S INDIVIDUAL HOT CUT PROCESS NOR ITS BATCH
14 ORDERING PROCESS PERMIT CLECS TO TRANSFER RETAIL OR UNE-P
15 LINES TO EELs” AND THAT “THE COMMISSION SHOULD REQUIRE
16 BELL SOUTH TO ACCOMMODATE EELs IN ITS INDIVIDUAL HOT CUT
17 PROCESS AND ITS BATCH PROCESS.” PLEASE COMMENT.
18

19 A. Mr. Webber is only partially correct. In my direct testimony, I stated that
20 BellSouth’s batch hot cut process currently does not provide for hot cuts of UNE-
21 P arrangements to EELs. However, BellSouth’s batch hot cut process does
22 support hot cuts of retail/resale services to EELs. I should clarify that the current
23 retail/resale batch hot cut procedures handle DS1 EELs and new UNE-P/resale
24 DS0 EELs. As Mr. Webber indicated on pages 2 and 6 of his testimony,
25 BellSouth’s batch hot cut process currently does not provide hot cuts of existing

1 UNE-P and DS0 retail loops to EELs. However, BellSouth has agreed to include
2 hot cuts to DS0 EELs in its batch and individual hot cut processes. BellSouth's
3 target implementation date is July 2004. Exhibit KLA-7, filed with my rebuttal
4 testimony, is a draft of the Market Service Description for this process.
5

6 Q. FURTHER ON PAGE 8 OF HIS TESTIMONY, MR. WEBBER OPINES AS TO
7 HOW BELLSOUTH'S PROCESSES AND REQUIREMENTS SHOULD BE
8 CHANGED TO MAKE EELs USEFUL TO CLECS AND SUGGESTS THAT
9 DURING THE PROVISIONING PROCESS, "ALL ANI TESTING SHOULD BE
10 COMPLETED VIA THE DS0 EEL." PLEASE COMMENT.
11

12 A. BellSouth's product team is currently developing the DS0 EEL process.
13 Therefore, it would be premature for me to speculate on specific work steps
14 within that process. Nonetheless, BellSouth does agree that appropriate hot cut
15 pre-due and due date testing will be part of the process. This includes the ANI
16 testing at the conversion location as described by Mr. Webber on page 8 of his
17 testimony.
18

19 ***CLEC-to-CLEC Migrations***
20

21 Q. MS. LICHTENBERG, ON PAGE 7 OF HER TESTIMONY, IMPLIES THAT
22 BELLSOUTH DOES NOT ADDRESS CLEC-TO-CLEC MIGRATIONS. HAS MS.
23 LICHTENBERG IDENTIFIED ANY ISSUE IN A CLEC-TO-CLEC MIGRATION
24 THAT IS THE RESPONSIBILITY OF BELLSOUTH?
25

1 A. Absolutely not. As I stated in my rebuttal testimony, the issues about which Ms.
2 Lichtenberg complains are neither caused by BellSouth nor can they be resolved
3 by BellSouth. Ms. Lichtenberg seems to suggest that BellSouth should be
4 penalized for lack of effective processes, communication, or execution between
5 two different CLECs, neither of which BellSouth controls. I would submit the
6 opposite position and ask that the Commission not endorse or support Ms.
7 Lichtenberg's argument when even she admits that BellSouth is not directly
8 involved in the process issues she describes.

9

10 Q. FROM A PROVISIONING PERSPECTIVE, WILL BELL SOUTH PERFORM
11 CLEC-TO-CLEC MIGRATIONS?

12

13 A. Absolutely. BellSouth's individual hot cut process has always included CLEC-to-
14 CLEC migrations. In response to CLEC concerns, BellSouth has agreed to add
15 CLEC-to-CLEC migrations (UNE-P to UNE-L) to the Batch Hot Cut Process, as
16 well as CLEC-to-CLEC migrations (UNE-L to UNE-L) as soon as necessary
17 systems changes can be made.

18

19 ***Web-based Scheduler***

20

21 Q. MS. LICHTENBERG STATES, ON PAGE 8 OF HER TESTIMONY, THAT
22 BELL SOUTH'S BATCH HOT CUT PROCESS IS NOT ACCEPTABLE BECAUSE
23 IT "REQUIRES ADDITIONAL STEPS (A MANUAL SPREADSHEET,
24 NEGOTIATION FOR DUE DATES AND A NEW BULK LSR) TO THE
25 PROCESS." ON PAGE 11 OF HER TESTIMONY, SHE RECOMMENDS THAT

1 BELL SOUTH SHOULD IMPLEMENT "A SCHEDULING TOOL SUCH AS THE
2 ONE VERIZON IS DISCUSSING AND THAT SBC IS PROPOSING. PLEASE
3 RESPOND.
4

5 A. BellSouth's spreadsheet process, particularly when coupled with project
6 management, is an effective means by which to manage large volumes of hot
7 cuts. As demonstrated by BellSouth's independent third party test, BellSouth
8 follows its process and the process works. Other than disagreeing with a manual
9 process generally, Ms. Lichtenberg has neither pointed to any specific issue nor
10 any documented flaw in BellSouth's ordering process. Curiously, though she
11 does not say so, Ms. Lichtenberg was involved in the development of the
12 ordering portion of the batch hot cut process as BellSouth witness Mr. Pate
13 describes.
14

15 In an effort to be responsive to CLEC concerns, however unfounded they may
16 be, BellSouth has agreed to implement a mechanized, web-based scheduler for
17 batch ordering to further enhance the mechanized batch ordering process.
18 BellSouth is targeting the release of this functionality for October 2004. Exhibit
19 KLA-6, filed with my rebuttal testimony, outlines specific details of this web-based
20 application.
21

22 ***Same-day Cuts for End User Accounts***
23

24 Q. ON PAGE 9 OF HER TESTIMONY, MS. LICHTENBERG CRITICIZES THE
25 BATCH PROCESS FOR NOT GUARANTEEING AN END USER'S LINES WILL

1 BE CUT ON THE SAME DAY. PLEASE RESPOND.

2
3 A. BellSouth will guarantee that all the lines in an end user's account will be cut on
4 the same day. This should alleviate Ms. Lichtenberg's concern.

5
6 ***Interval Reduction***

7
8 Q. MS. LICHTENBERG, ON PAGE 11 OF HER TESTIMONY, STATES "THE
9 FOUR BUSINESS DAYS BELL SOUTH REQUIRES FOR INITIAL
10 NEGOTIATION IS FAR TOO LONG; THE ENTIRE PROCESS FROM START
11 TO FINISH SHOULD TAKE FIVE BUSINESS DAYS." PLEASE RESPOND.

12
13 A. If Ms. Lichtenberg is suggesting the entire processing interval for batch
14 migrations should only require five (5) business days for processing transfers of
15 possibly hundreds of lines, then I adamantly disagree. The planning, pre-due
16 preparation (wiring), quality checks, and due date work activity are functions
17 directly related to the ability to match workforce to load. Handling mass volumes
18 of hot cuts requires appropriate planning and appropriate intervals to effectuate a
19 seamless migration. Five (5) business days is insufficient time to complete that
20 process.

21
22 That being said, if Ms. Lichtenberg is referring specifically to the period of time in
23 which BellSouth reviews the spreadsheet, BellSouth has reduced that interval
24 from seven (7) days to four (4) days as part of a batch interval reduction effort.
25 This change was effective on February 18, 2004.

1 In addition, BellSouth, in conjunction with other planned enhancements, will
2 reduce the 14-business day provisioning interval to eight (8) days. This change
3 is currently scheduled to take place in systems release 16.0 in July of this year.
4

5 ***Mechanized Communication Tool***

6
7 Q. MS. LICHTENBERG COMPLAINS, ON PAGE 11 OF HER TESTIMONY, THAT
8 BELLSOUTH NEEDS A COMMUNICATION TOOL SIMILAR TO THE VERIZON
9 "WPTS". PLEASE RESPOND.
10

11 A. BellSouth will provide a web-based notification tool for non-coordinated batch
12 conversions. BellSouth will make this tool available to CLECs by June 2004.
13 Exhibit KLA-5, filed with my rebuttal testimony, provides specific details and
14 sample screen prints of information to be contained in the web-based system.
15

16 ***SBC's Process***

17
18 Q. ON PAGES 8-9 OF HIS TESTIMONY, MR. VAN DE WATER DISCUSSES
19 SBC'S PROCESS. WHAT IS YOUR ANALYSIS OF SBC'S PROCESS?
20

21 A. I have reviewed the SBC **proposed** batch processes and will address each of
22 the bullet list items in Mr. Van De Water's testimony below.

- 23 • Flexible scheduling—BellSouth has agreed to include after-hours and
24 Saturday cuts in the batch process.
- 25 • Eliminates negotiation steps and time involved—BellSouth's current batch

1 hot cut process involves very little negotiation with the CLEC. There is
2 some internal negotiation that occurs to establish due dates. As stated
3 previously, BellSouth also has agreed to implement a scheduling tool to
4 allow CLECs to select batch migration due dates thus reducing negotiation
5 steps and manual interface time.

- 6 • Provides defined interval to allow for CLEC resource planning –
7 BellSouth's current batch hot cut process allows for CLEC resource
8 planning. The CLECs have the ability to request a desired due date when
9 they submit their batch request. If the requested due date does not
10 represent an interval shorter than the minimum, BellSouth will honor that
11 date as long as workload and available personnel will allow. Regardless
12 of whether the CLEC requests a due date, BellSouth supplies the due
13 date when the project notification sheet is returned to the CLEC. This
14 should allow the CLEC sufficient time for resource planning. As stated
15 previously, BellSouth also is implementing a scheduling tool to allow the
16 CLECs to select batch migration due dates prior to submitting their batch
17 request.
- 18 • Provides CLECs an ability to reserve a specific hot cut time—As stated
19 above, under the current batch hot cut process, the BellSouth Customer
20 Care Project Manger will work with the CLEC if the CLEC needs or
21 desires a coordinated hot cut order to be worked within a certain time
22 window. Moreover, in an effort to be responsive, BellSouth has agreed to
23 (1) commit to a four-hour time window for coordinated hot cuts; and (2) to
24 develop a scheduling tool to allow the CLEC to request time frames for
25 coordinated orders.

- 1 • Wire center based to provide CLEC the ability to convert multiple central
2 offices on the same day—BellSouth’s current process also allows the
3 ability to convert multiple offices on the same day.
- 4 • Includes requests involving Integrated Digital Loop Carrier (“IDLC”) hot
5 cuts—BellSouth’s current process includes requests involving IDLC hot
6 cuts.
- 7 • Mechanized order flow—BellSouth’s batch hot cut orders will flow through
8 at the same rate as individual orders of the same type. In addition to this,
9 BellSouth current batch hot cut process allows for the submission of a
10 single bulk LSR for up to 99 end user accounts where SBC’s proposed
11 process requires single LSR submissions for each account.
- 12 • Reservation tool—In BellSouth’s current batch hot cut process, the
13 Customer Care Project Manger performs this function for the CLEC.
14 Again, BellSouth’s scheduler tool, which it has agreed to implement, will
15 allow due date reservations.
- 16 • Pre-order IDLC tool—BellSouth’s current process also provides this
17 function through the use of its Loop Makeup Tool. The CLEC can query
18 BellSouth’s loop information database to see what type of loop facility is
19 currently used to serve the end user’s line and to reserve an alternate
20 serving facility, if available, if the line is currently served by IDLC
21 equipment.

22

23 ***Time Window For Hot Cuts***

24

25 Q. MR. VAN DE WATER, ON PAGE 10 OF HIS TESTIMONY, SAYS THAT

1 BELLSOUTH WILL NOT COMMIT TO TIME-SPECIFIC HOT CUTS, OR EVEN
2 TO A TIME WINDOW, IN THE BATCH HOT CUT PROCESS. PLEASE
3 COMMENT.

- 4
- 5 A. As I discussed earlier, BellSouth has enhanced its batch hot cut process to
6 guarantee a four (4) hour time window for coordinated hot cuts via the batch hot
7 cut process. This should alleviate Mr. Van de Water's concern.

8

9 ***After-Hours/Weekend Cuts***

- 10
- 11 Q. ON PAGE 11 OF HIS TESTIMONY, MR. VAN DE WATER STATES THAT
12 BELLSOUTH WILL NOT DO AFTER-HOURS HOT CUTS OR SCHEDULE HOT
13 CUTS ON WEEKENDS TO AVOID END USER DISRUPTION. IS HE
14 CORRECT?

- 15
- 16 A. No. As I previously stated, BellSouth will include after hours and Saturday cuts
17 in the batch process.

18

19 ***Retail to UNE-L Conversions***

- 20
- 21 Q. ON PAGE 15 OF MR. VAN DE WATER'S TESTIMONY, HE CRITICIZES
22 BELLSOUTH'S BATCH HOT CUT PROCESS BECAUSE IT DOES NOT APPLY
23 TO RETAIL TO UNE-L CONVERSIONS (THAT IS, FROM BELLSOUTH'S
24 RETAIL SERVICE TO AN UNBUNDLED LOOP ARRANGEMENT). PLEASE
25 COMMENT.

1 A. The purpose of the batch hot cut process is to move large numbers of loops from
2 one carrier's local switch to another carrier's local switch. Thus, the process is
3 particularly suited to the conversion of an embedded base of customers.
4 Specifically, the batch hot cut process was envisioned as the vehicle for moving
5 large quantities of CLECs' customers served by UNE-P arrangements (and thus
6 served by BellSouth's switches) to UNE-L arrangements served by the CLECs'
7 respective switches. Customer acquisition, on the other hand, does not lend
8 itself to batch conversions since customers are won one at a time. CLECs do not
9 structure their marketing plans or their sales channels to target a single wire
10 center on a single day. To the contrary, CLECs generally advertise their services
11 over large geographic areas (via television, radio or newspaper, for example) and
12 are winning customers statewide in whatever order they sign up. It would make
13 no sense for a CLEC to forego the revenue associated with customer acquisition
14 while the CLEC accumulated sufficient customers in a given wire center to make
15 use of the batch process meaningful and efficient. BellSouth has a Commission-
16 approved individual hot cut process that is better suited for and should be utilized
17 for customer acquisition.

18

19 **Scalability Of The Batch Hot Cut Process**

20

21 Q. MS. LICHTENBERG, ON PAGE 3 OF HER TESTIMONY, ALLEGES THAT
22 BELL SOUTH'S DESCRIPTIONS OF HOW IT WILL SCALE ITS OPERATIONS
23 ARE NO MORE THAN "FUTURE" PROMISES. DO YOU AGREE?

24

25 A. No, I do not agree. BellSouth has a proven track record of staffing its centers

1 and network forces to accommodate changing and increasing loads. Ms.
2 Lichtenberg has pointed to no evidence to support her claim that BellSouth's
3 process is not scalable. The Commission, therefore, should disregard her
4 testimony on this point.

5
6 Q. ON PAGE 6 OF HER TESTIMONY, REGARDING THE IMPACT OF
7 INCREASED MANUAL ORDER PROCESSING REQUIRED FOR UNE-L
8 ORDERS, MS. LICHTENBERG ALLEGES THAT BELL SOUTH'S FORCE
9 MODEL "FAILS TO ADDRESS THE FUNDAMENTAL QUESTION OF
10 WHETHER SIMPLY STAFFING UP CAN ADDRESS THE PROBLEM." PLEASE
11 COMMENT.

12
13 A. Ms. Lichtenberg is incorrect. BellSouth's force model does account for different
14 fallout rates. The increased quantity of BellSouth Service Representatives that I
15 discussed in my direct testimony included personnel required to handle an
16 increased number of manual orders.

17
18 Q. ON PAGE 16 OF HIS TESTIMONY, MR. VAN DE WATER CRITICIZES
19 BELL SOUTH FOR "THROWING BODIES" AT THE HOT CUT PROBLEM
20 RATHER THAN PROPOSING ANY MECHANIZATION OF THE PROCESS.
21 PLEASE COMMENT.

22
23 A. First, despite Mr. Van de Water's characterization, BellSouth does not believe it
24 has a hot cut "problem." Rather, it has an efficient and seamless process by
25 which it can move loops from one carrier's switch to another carrier's switch.

1 Second, BellSouth is not “throwing bodies” at the problem. Rather, it will staff its
2 network forces to handle the hot cuts that arise. Whether AT&T likes it or not, it
3 takes human beings to run a telephone company. Finally, BellSouth agrees that
4 it has not taken steps to institute the eight (8) billion dollar retrofit of its network
5 that AT&T advocates. Such a capital expenditure cannot be justified, particularly
6 when BellSouth has an efficient hot cut process in place. I find it curious that Mr.
7 Van de Water offers no financial support for the massive capital expenditure that
8 he advocates. The reason is obvious: AT&T would like this Commission to
9 saddle BellSouth with an enormous capital expense (in which AT&T would not
10 participate) for what would amount to a technological fool’s errand.

11
12 Q. ON PAGE 21 OF HIS TESTIMONY, MR. VAN DE WATER ARGUES THAT
13 BELLSOUTH’S CUTOVER OF OVER 260 LINES IN A SINGLE CENTRAL
14 OFFICE IN ONE DAY DOES NOT DEMONSTRATE BELLSOUTH’S ABILITY TO
15 PERFORM HOT CUTS AT FORESEEABLE VOLUMES. PLEASE COMMENT.

16
17 A. To the contrary, this single day shows BellSouth’s ability to successfully complete
18 high volumes of orders within a single central office, including hot cuts for loops
19 served by IDLC equipment, while sustaining significant volumes in several other
20 central offices. On the date referenced by Mr. Van de Water, BellSouth
21 converted 98% of 440 orders scheduled for conversion. Approximately 50% of
22 the orders on this day were IDLC conversions. On the same day, the highest
23 single central office performance was 97.5%, provisioning 201 of the 206 orders
24 due. Through the date of this filing, BellSouth has consistently maintained a
25 successful due date completion rate average of over 98% for UNE-P to UNE-L

1 migrations with total UNE-P to UNE-L migration volumes as high as 1,000 per
2 day total and in single offices of over 350 per day. Month over month, UNE-P to
3 UNE-L volumes have risen significantly with totals of over 1,900 in November
4 2003; over 3,100 in December 2003; over 5,400 in January 2004; and over 6,600
5 in February 2004. During the months of November and December 2003, Missed
6 Installation Appointments for the CLEC aggregate was 1.27% for November and
7 1.54% for December as compared to the BellSouth retail rates of 1.75% and
8 1.90%, respectively. In sum, BellSouth's performance has been stellar.

9
10 Bellsouth has maintained its high due date performance rates with virtually no
11 advance planning or notice from CLECs. Given the fact that CLECs have the
12 ability to use the batch migration process, which allows both the CLEC and
13 BellSouth extended intervals for planning and coordination, it obviously follows
14 that BellSouth's ability to perform hot cuts in large quantities would only improve
15 if CLECs were to use the batch hot cut process, and thus give some BellSouth
16 idea of 'foreseeable' hot cut volumes.

17
18 Exhibit KLA-10 sets forth BellSouth's UNE-P to UNE-L hot cut performance for
19 October 9, 2003 – January 31, 2004.

20
21 Q. ON PAGE 22 OF HIS TESTIMONY, MR. VAN DE WATER STATES THAT
22 BELL SOUTH'S ASSUMPTION REGARDING NON-COORDINATED HOT CUTS
23 IN ITS FORCE MODEL IS INCORRECT. PLEASE COMMENT.

24
25 A. There is no real way for BellSouth to be certain which option, coordinated or non

1 coordinated, CLECs will choose to convert their UNE-Ps. BellSouth assumed
2 that at least half of the migrations will be non-coordinated. To date, the vast
3 majority, if not all, migrations from UNE-P arrangements to UNE-L arrangements
4 have been non-coordinated. BellSouth does not expect that future migrations will
5 differ very much from this. Moreover, MCI representatives, in a hot cut workshop
6 in Tennessee, advised that they expected to use non-coordinated conversions
7 for the vast majority of their mass market conversions. Further, based on the fact
8 that a high percentage of UNE-P end users are residential, BellSouth expects the
9 non-coordinated option to be used based simply on CLECs' economics. If
10 BellSouth's assumptions prove to be incorrect, BellSouth's force model can, and
11 will, be adjusted.

12
13 Q. MR. VAN DE WATER, ON PAGE 23 OF HIS TESTIMONY, IMPLIES THAT
14 BELL SOUTH INCORRECTLY ASSUMES A BALANCED LOAD OF
15 MIGRATIONS WHEN THE REALITY IS THAT THE CONVERSIONS MAY BE
16 "BACKLOADED" AT THE END OF THE SCHEDULE. DO YOU AGREE?

17
18 A. No, I do not agree. The schedule, as outlined by the FCC in the TRO, allows
19 sufficient time for any reasonable CLEC to plan and implement the necessary
20 collocation arrangements and other facilities needed to provide switching.
21 BellSouth should not be held accountable for poor planning on the part of a
22 CLEC who chooses to procrastinate and wait until the end of the 21-month
23 period to convert most or all of their UNE-P arrangements.

24
25 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

1 A. Yes.

UNE-P to UNE-L Order Summary			
October 9, 2003 - January 31, 2004			
	Date	Volume	% DD Complete
October	10/09/2003	61	100.0%
199	10/10/2003	91	100.0%
	10/16/2003	31	100.0%
	10/17/2003	2	100.0%
	10/21/2003	11	100.0%
	10/28/2003	2	100.0%
	10/29/2003	1	100.0%
November	11/04/2003	1	0.0%
1977	11/05/2003	1	100.0%
	11/06/2003	85	98.8%
	11/07/2003	90	98.9%
	11/10/2003	70	100.0%
	11/11/2003	62	100.0%
	11/12/2003	62	100.0%
	11/13/2003	69	98.6%
	11/14/2003	16	100.0%
	11/17/2003	98	99.0%
	11/18/2003	136	98.5%
	11/19/2003	98	100.0%
	11/20/2003	375	99.7%
	11/21/2003	167	98.8%
	11/24/2003	434	99.3%
	11/25/2003	202	100.0%
	11/26/2003	11	100.0%
December	12/01/2003	140	100.0%
3136	12/02/2003	319	99.4%
	12/03/2003	238	99.6%
	12/04/2003	114	98.2%
	12/05/2003	7	85.7%
	12/08/2003	23	95.7%
	12/10/2003	393	98.0%
	12/12/2003	85	100.0%
	12/15/2003	285	99.6%
	12/16/2003	3	66.7%
	12/17/2003	154	96.1%
	12/18/2003	9	100.0%
	12/19/2003	297	98.3%
	12/22/2003	642	98.9%
	12/23/2003	1	100.0%
	12/24/2003	415	98.6%
	12/26/2003	3	100.0%
	12/29/2003	8	100.0%

