February 20, 2001

Mr. Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: Petition by AT&T Communications of the South Central States, Inc. and TCG Ohio for Arbitration of Certain Terms and Conditions of a Proposed Agreement With BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252
PSC 2000-465

Dear Mr. Dorman:

Pursuant to the Commission's November 17, 2000, Order in the above-captioned case, BellSouth files herewith the original and four (4) copies of its Rebuttal Testimony of W. Keith Milner, Ronald M. Pate and John A. Ruscilli. A CD-ROM containing the filing is also enclosed

Sincerely,

Creighton E. Mershon, Sr.

Enclosures

cc: Parties of Record

247969

CERTIFICATION

I hereby certify that the electronic version of this filing made with the Commission this 20th day of February 2001 is a true and accurate copy of the documents filed herewith in paper form, that the electronic version of the filing has been transmitted to the Commission and that the Commission and AT&T have been notified by electronic mail that the electronic version of this document has been transmitted to the Commission.

I also certify that a copy of the foregoing was served on the individuals on the Service List by mailing a copy thereof on this 20th day of February 2001.

_____
Creighton E. Mershon,

247972

STATE OF Florida

COUNTY OF Leon

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared W. Keith Milner, 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 "The Petition by AT&T Communications of the South Central States, Inc., and TCG of Ohio for Arbitration of Certain Terms and Conditions of a Proposed Agreement with BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252," Commission Case No. 2000-465, and if present before the Commission and duly sworn, his rebuttal testimony would be set forth in the annexed transcript consisting of 21 pages and 0 exhibit(s).

W. Keith Milner

SWORN TO AND SUBSCRIBED BEFORE ME this
14th day of Feb, 2001.

Tanya W. Lynn
NOTARY PUBLIC

Tanya W. Lynn
MY COMMISSION # CC673581 EXPIRES
September 8, 2001
BONDED THRU TROY FAIN INSURANCE, INC.

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF W. KEITH MILNER

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

CASE NO. 2000-465

FEBRUARY 20, 2001

Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present position since February 1996.

Q. ARE YOU THE SAME W. KEITH MILNER WHO EARLIER FILED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED TODAY?

A. I will respond to portions of the testimony of AT&T Communications of the South Central States, Inc. and TCG - Ohio (collectively "AT&T")

witnesses Mills and Bradbury with respect to Issues 16, 18, and 19 in whole or in part.

Issue 16: Is conducting a statewide investigation of criminal history records for each AT&T employee or agent being considered to work on a BellSouth premises a security measure that BellSouth may impose on AT&T?

Q. ON PAGES 3-4 OF HIS TESTIMONY, MR. MILLS DISCUSSES CRIMINAL BACKGROUND CHECKS AND ASSERTS THAT BELLSOUTH'S REQUIREMENT IS EXCESSIVE. DOES BELLSOUTH INSIST THAT AT&T PERFORM SECURITY CHECKS OF ALL ITS EMPLOYEES?

A. No. BellSouth is indifferent to the security measures and background checks AT&T makes for its employees to access its own buildings. However, BellSouth is rightly concerned that proper security measures and background criminal checks be performed on AT&T's employees for which AT&T wants unescorted access to BellSouth's premises. If AT&T doesn't want to perform background criminal checks of all of its employees, it need only check those of its employees it wants admitted to BellSouth's premises.

Q. MR. MILLS STATES THAT AT&T WILL INDEMNIFY BELLSOUTH FOR ANY DAMAGE THAT OCCURS TO BELLSOUTH’S PROPERTY

AT BELLSOUTH'S PREMISES AS A RESULT OF THE ACTIVITIES OF AN AT&T EMPLOYEE OR AGENT. PLEASE COMMENT.

A. AT&T's offer to indemnify BellSouth for bodily injury or property damage is not sufficient in light of the assets at risk. Indemnification is an after the fact solution. By requiring criminal background investigations, BellSouth is seeking to protect the consumer and other CLECs up front from the inherent risks.

Q. ON PAGE 4 OF HIS TESTIMONY, MR. MILLS STATES "THERE IS NO INDICATION THAT REQUIRING CRIMINAL BACKGROUND CHECKS WILL IMPROVE SECURITY." DO YOU AGREE?

A. No. Criminal background checks are a reasonable way to prevent known criminals from even being in a place where they could cause harm or damage to BellSouth's or a CLEC's network. Mr. Mills' suggestion is sort of like saying that preventing known bank robbers from working at banks does not lessen the risk that a bank will be robbed.

Issue 18: Has BellSouth provided sufficient customized routing in accordance with State and Federal law to allow it to avoid providing Operator Services/Directory Assistance ("OS/DA") as a UNE?

Q. ON PAGE 39 OF HIS TESTIMONY, MR. BRADBURY ASSERTS

"FROM A PRACTICAL STANDPOINT, THE CUSTOMIZED ROUTING ARCHITECTURE PROPOSED BY BELLSOUTH MUST BE FULLY IMPLEMENTABLE AND AVAILABLE IN EVERY END OFFICE WHERE TECHNICALLY FEASIBLE." DO YOU AGREE?

A. No. Mr. Bradbury would blithely demand that BellSouth spend money to equip each and every one of its end office switches for customized routing on the chance that AT&T or some other CLEC might someday order customized routing in each end office. BellSouth has no obligation to spend its money in such a way. If, on the other hand, AT&T requests customized routing in each and every end office switch, BellSouth will gladly fulfill AT&T's request.

Q. MR. BRADBURY FURTHER ASSERTS THAT THE CUSTOMIZED ROUTING ARCHITECTURE PROPOSED BY BELLSOUTH MUST BE CAPABLE OF SUPPORTING BOTH BRANDED AND UNBRANDED MESSAGING AND ROUTING TO NON-BELLSOUTH PLATFORMS. PLEASE RESPOND.

A. BellSouth's customized routing solutions can be provisioned promptly and can handle both branded and unbranded responses to end users' calls. AT&T need only place an order with BellSouth for customized routing and BellSouth will provide it.

Q. ON PAGE 40 OF HIS TESTIMONY, MR. BRADBURY STATES

"BELLSOUTH HAS PROPOSED LINE CLASS CODE SOLUTION AND AN INTELLIGENT NETWORK ("AIN") SOLUTION FOR CUSTOMIZED ROUTING. THE PROPOSED AIN SOLUTION HAS BEEN PROMISED BY BELLSOUTH FOR SEVERAL YEARS. TO DATE, BELLSOUTH HAS NOT DELIVERED ON ITS PROMISE." DO YOU AGREE?

A. Absolutely not. Both the LCC method and the AIN method are available today. The LCC method is available to CLECs in addition to BellSouth's AIN method and both have been tested and proved workable. If AT&T wants to use the LCC method, it merely needs to order it. Insofar as tests are concerned, AT&T itself participated in cooperative testing of BellSouth's AIN method for customized routing in 1997. Later, BellSouth offered to do a trial of the AIN method in Louisiana yet not one CLEC, not even AT&T, showed the slightest interest in being part of that trial. It is thus surprising to me that Mr. Bradbury faults BellSouth for AT&T's unwillingness to use BellSouth's AIN solution which AT&T itself, in the first round of arbitrations, said it wanted. As with the LCC method, if AT&T wants to use the AIN method, it merely needs to order it.

Q. MR. BRADBURY FURTHER STATES "THAT TRIAL [THAT IS, THE JOINT BELLSOUTH/AT&T TESTING OF THE AIN SOLUTION IN JANUARY 1998] IDENTIFIED CALL SETUP PROBLEMS THAT INCREASED POST-DIALING DELAY TO APPROXIMATELY ONE

SECOND FOR OPERATOR SERVICE CALLS AND TWO SECONDS FOR DIRECTORY ASSISTANCE CALLS." DO YOU AGREE?

A. No. Post dialing delay is the time between when the end user finishes dialing and when the customer is informed (via ringing signal, busy tone, etc.) of the call's progress. All switching systems take some time to translate the dialed digits, select an appropriate trunk group, etc., and all these functions contribute to post dialing delay. So, post dialing delay is not solely a consequence of BellSouth's AIN customized routing solution. With the AIN solution, a computer database is queried during call processing to determine the CLEC's preferred routing for a particular end user. This database query takes time and thus adds a small increment of post dialing delay to the overall processing of the call. BellSouth believes the post dialing delay will be approximately one second. If AT&T is concerned with that small an amount of post dialing delay, AT&T can simply request the Line Class Code method and thereby eliminate its concerns about post dialing delay.

Q. ON PAGE 41 OF HIS TESTIMONY, MR. BRADBURY CLAIMS THAT THE AIN SELECTIVE ROUTING CAPABILITY COULD BE PERFORMED BY THE END OFFICE, ELIMINATING THE POST DIAL DELAY ASSOCIATED WITH THE TANDEM/HUB ARRANGEMENT. WHY DID BELLSOUTH CHOOSE TO PERFORM THE DATABASE QUERY FROM THE AIN HUB RATHER THAN FROM EACH AND

EVERY END OFFICE SWITCH?

A. The AIN method of customized routing allows the use of the AIN "hub" concept, which yields several advantages as follows:

- Allows the use of appropriate AIN "triggers" for all call types rather than only a limited set of call types.
- Allows even those end office switches that are not AIN capable to use the AIN customized routing solution.
- Optimizes the use of trunk groups by allowing the carriage of customized routing traffic over common trunk groups between the end office and the AIN hub.

Thus, the AIN hubbing arrangement allows the use of the AIN method in all switches, even those that are not AIN capable. Also, the AIN hubbing arrangement allows some sharing of common trunk groups, an arrangement that other CLECs have stated they prefer.

Q, ON PAGES 41-42 OF HIS TESTIMONY, MR. BRADBURY ALLEGES THAT THE AIN SOLUTION IS INEFFICIENT BECAUSE IT BYPASSES THE INTELLIGENCE OF THE SWITCH AND REQUIRES EVERY SINGLE CALL TO QUERY THE DATABASE FOR ROUTING INSTRUCTIONS. IS HE CORRECT?

A. No. Mr. Bradbury appears to be generally attacking the use of AIN. He asserts that AIN was not intended to support normal call routing

and does not work well for high-volume based calling. He is wrong. I would note that on-line databases are used millions of times a day for determining whether or not to honor long distance calling cards and for determining the calling name to be displayed on an end user's telephone, just to name a couple of applications. These are certainly high volume calling applications and they are accomplished via AIN solutions. No one seriously claims that these functions should be (or even could be) accomplished by putting that intelligence into each and every single switch in the network. Indeed, flexibility of call routing was a driving motivation for AIN in the first place. Similarly, BellSouth's AIN method for customized routing puts relevant information into an on-line database for use during call processing. This allows CLECs, including AT&T, greater flexibility in determining how to handle the calls from specific end users.

Q. ON PAGE 42 OF HIS TESTIMONY, MR. BRADBURY TURNS HIS ATTENTION TO THE LINE CLASS CODE METHOD FOR CUSTOMIZED ROUTING AND STATES "WHILE LINE CLASS CODES HAVE BEEN USED TO PERFORM CUSTOMIZED ROUTING IN A TEST ENVIRONMENT, BELLSOUTH HAS NOT YET PROVIDED SUFFICIENT INFORMATION SUCH AS ORDERING INSTRUCTIONS AND SUPPORTING DOCUMENTATION TO AT&T FOR EACH OF THE CUSTOMIZED ROUTING OPTIONS THAT BELLSOUTH MUST PROVIDE." PLEASE COMMENT.

A. I am perplexed by his statement. First Mr. Bradbury admits, "...line class codes have been used to perform customized routing in a test environment...." This suggests to me that he agrees that the Line Class Code method works for customized routing. But the second part of his statement is that "...BellSouth has not yet provided sufficient information such as ordering instructions and supporting documentation to AT&T for each of the customized routing options that BellSouth must provide." BellSouth has provided AT&T with a proposed contract language addition for procedures for selective routing. (Attachment 7, Section 3.20 et seq.) This proposed language will provide specific ordering procedures and documentation as requested by AT&T. However, as even Mr. Bradbury admits, AT&T and BellSouth tested the Line Class Code method back in 1997. Despite that testing, he claims there remain certain outstanding issues. I disagree. Whether or not there are any outstanding issues, if AT&T wants the Line Class Code method of customized routing because AT&T prefers it over the AIN method, AT&T should simply order the Line Class Code method which is and has long been available to it.

Q. ON PAGE 44 OF HIS TESTIMONY, MR. BRADBURY STATES "BELLSOUTH MUST BE ABLE TO ROUTE OS/DA CALLS USING EXISTING TANDEM ARCHITECTURE." IS HE CORRECT?

A. No. BellSouth has no obligation to route AT&T's operator services and directory assistance traffic differently than BellSouth routes its own

operator services and directory assistance traffic. I am unaware of any requirement that BellSouth route a CLEC's operator services and directory assistance traffic via a tandem. Further, that is not how BellSouth routes its own operator services and directory assistance traffic. Instead, BellSouth uses direct trunk groups between BellSouth's end office switches and BellSouth's operator services and directory assistance platforms. However, BellSouth will provide unbundled tandem switching to AT&T and AT&T can use that capability as it chooses, subject only to the technical capabilities of the tandem switch.

Q. ON PAGE 45 OF HIS TESTIMONY, MR. BRADBURY SUGGESTS THAT BECAUSE BELLSOUTH HAS NOT YET DEMONSTRATED THAT IT HAS IN PLACE A CUSTOMIZED ROUTING SOLUTION THAT COMPLIES WITH ALL REQUIREMENTS OF THE FCC, THE KENTUCKY PSC SHOULD REQUIRE BELLSOUTH TO CONTINUE TO PROVIDE OS/DA AS UNBUNDLED NETWORK ELEMENTS AT UNBUNDLED NETWORK ELEMENT PRICES. DO YOU AGREE?

A. No. As I discussed previously, BellSouth has available both an AIN solution for customized routing as well as the LCC solution that was advocated by AT&T during the first round of arbitrations. The FCC's Rule 319(f) makes clear that BellSouth is not required to provide access to operator services and directory assistance where it provides CLECs "with customized routing or a compatible signaling protocol."

Thus, BellSouth has met its requirement to provide customized routing and as a result is not obligated to provide access to operator services and directory assistance at cost-based rates.

Issue 19: What procedure should be established for AT&T to obtain loop-port combinations (UNE-P) using both Infrastructure and Customer Specific Provisioning?

Q. ON PAGE 5 OF HIS TESTIMONY, MR. BRADBURY SUGGESTS THAT THERE BE A TWO-PART PROCESS FOR THE PROVISIONING OF CUSTOMIZED ROUTING. DO YOU AGREE?

A. Yes. The first part entails the establishment of required switch translations and trunk groups for the end offices in which the CLEC requests customized routing. This is the "infrastructure provisioning" for customized routing. During this part, BellSouth would establish the Line Class Codes (LCCs) that control the routing <u>as requested by the CLEC</u> as well as any associated trunk groups. Mr. Bradbury refers to this as establishing the "footprint". This part would be required whether AT&T served one or any quantity of end users in a given BellSouth end office switch. Once this part is completed, the second part of the provisioning process is possible. This part is the "customer specific provisioning" for customized routing. During this second part, the CLEC would send its individual Local Service Requests (“LSRs”) for the particular end users that it will serve in a given BellSouth end

office switch within the pre-established footprint.

Q. WHAT IS YOUR UNDERSTANDING OF THE DISAGREEMENT BETWEEN BELLSOUTH AND AT&T REGARDING ISSUE 19?

A. There are two parts to the dispute. The first part concerns whether BellSouth has provided to AT&T sufficient information such that AT&T will know how to prepare its orders for customized routing. BellSouth's witness Pate will address this part of the dispute. The second part of the dispute concerns the meaning of what the FCC meant by "'one set of routing instructions" as it used that phrase in paragraph 224 of its Second Louisiana Order (issued in response to BellSouth's second application for in-region interLATA authority). BellSouth's understanding is that the FCC's Order requires BellSouth to determine the correct Line Class Codes to use in response to an LSR for a given end user only if the CLEC has a single routing plan for all of its customers. While BellSouth reads the FCC's Order to mean that, for BellSouth to be responsible for determining the proper LCC to use on a given LSR, AT&T must have a single routing plan for all its customers in BellSouth's nine-state region, BellSouth is willing to consider a given state, such as Kentucky, as the boundary for satisfying the "single routing plan" situation. AT&T apparently believes the footprint may be as small as a metropolitan area. See Mr. Bradbury's testimony beginning on page 20 at line 22.

Q. WHAT IS YOUR UNDERSTANDING OF THE FCC'S SECOND LOUISIANA ORDER AS IT RELATES TO ISSUE 19?

A. I believe the FCC was trying to establish a requirement that BellSouth's competitors (such as AT&T) have the ability to create a default assignment of routing plans for their end users as does BellSouth. When a BellSouth retail customer orders service, BellSouth defaults the customer to BellSouth's own branded operator services and directory assistance. BellSouth believes that AT&T is asking BellSouth to create a situation where AT&T too can have a default for its customers. That is what the footprint does. The footprint informs BellSouth of how calls from AT&T's end users served by a BellSouth switch are to be routed unless AT&T informs BellSouth otherwise.

If this is what AT&T really wants, then BellSouth only has two issues. The first is to set the level at which such instructions have to be given. That is, will this default plan apply to the region as a whole, or on a state-by-state basis, or perhaps on a different level? I will speak to this more in a moment. Second, once the appropriate level for applying the default is determined, AT&T has to tell BellSouth what the default will be.

Q. ON PAGE 23 OF HIS TESTIMONY, MR. BRADBURY ASSERTS THAT "BELLSOUTH WISHES TO LIMIT AT&T TO ONLY ONE CUSTOMIZED OS/DA ROUTE, APPARENTLY FOR AN ENTIRE

STATE". PLEASE COMMENT.

A. AT&T is free to have as many different routing plans as it wants within the technical limitations of the switches themselves. The dispute regards which party (that is, BellSouth or AT&T) is responsible for determining which LCCs are to be used for a given LSR in cases where the CLEC has more than one routing plan for its end users. In its Second Louisiana Order, the FCC stated that if a CLEC informed an ILEC of its single set of routing instructions, that the ILEC rather than the CLEC could determine the appropriate LCC to use in for a given LSR. Following is the FCC's statement in paragraph 224 of its Second Louisiana Order:

> "We agree with BellSouth, that a competitive LEC must tell BellSouth how to route its customers' calls. If a competitive LEC wants <u>all</u> of its customer calls routed in the same way, it should be able to inform BellSouth, and BellSouth should be able to build the corresponding routing instructions into its systems just as BellSouth has done for itself. <u>If, however, a competitive LEC has more that one set of routing instructions for its customers</u>, it seems reasonable and necessary for BellSouth to require the competitive LEC to include in its order an indicator that will inform BellSouth which selective routing pattern to use." [Emphasis added]

BellSouth has no problem with the FCC's position. AT&T must, however, provide a single routing instruction to be used as the default. In cases where the default routing plan is not to be used for a particular end user, AT&T must inform BellSouth (via the LSR) which other routing pattern is to be used.

Q. WHAT SPECIFIC INPUT DOES AT&T NEED TO PROVIDE TO BELLSOUTH?

A. First, AT&T needs to inform BellSouth of how BellSouth is to “map” or route AT&T’s customers to AT&T’s choice of handling (branded, unbranded, etc.). Second, AT&T needs to inform BellSouth of the geographic scope of AT&T’s default routing plan (region, state, LATA, etc.) so BellSouth can construct the required translations tables. In Mr. Bradbury’s testimony, he indicates that the geographic scope of the default routing plan should be at AT&T’s option such as, by metropolitan area, or by state. Again, paragraph 224 of the FCC’s Second Louisiana Order states that if a CLEC has more that one set of routing instructions for all its customers, it would be appropriate for BellSouth to require the CLEC to include in the CLEC’s order an indicator that would inform BellSouth which customized routing pattern to use. This would imply application on a region-wide basis. Thus, BellSouth believes the FCC intended for a CLEC to have a default routing plan for the entire region. As I stated earlier, BellSouth is willing to allow a given state to serve as the default routing plan

footprint. That is, AT&T could elect a given default routing plan for Kentucky and a different default routing plan for Alabama.

Q. HAS AT&T GIVEN BELLSOUTH A DEFAULT ROUTING PLAN FOR AT&T's CUSTOMERS?

A. No. The testimony of Mr. Bradbury is ample proof that AT&T has still not done so. Instead of committing to a single routing plan as contemplated by the FCC's Order, AT&T still insists that routing decisions (and thus assignment of Line Class Codes) is situational. Mr. Bradbury suggests that AT&T will decide on a routing pattern by metropolitan area, or by state, at AT&T's option. Thus, it is clear that even now AT&T has no single default routing plan that it can or will convey to BellSouth that is instructive of how certain customers are to be handled. So AT&T wants BellSouth to read AT&T's mind and assign Line Class Codes correctly. This is simply not possible. If AT&T will commit to the single default routing plan contemplated by the FCC in its Second Louisiana Order and inform BellSouth of its routing plan, then and only then can BellSouth correctly assign Line Class Codes on AT&T's orders.

Q. SUPPOSE AT&T DECIDES THAT THE ENTIRE STATE OF KENTUCKY IS ITS "FOOTPRINT" AND INFORMS BELLSOUTH THAT AS BELLSOUTH RECEIVES LSRs FOR AT&T's CUSTOMERS IN KENTUCKY, AT&T's CUSTOMERS' OS/DA CALLS SHOULD BE

ROUTED TO AT&T's PLATFORM. WILL BELLSOUTH KNOW HOW TO PROCESS AT&T's LSRs WITHOUT AT&T INDICATING THE CORRECT LINE CLASS CODE TO USE?

A. Yes. BellSouth will have built the proper switch translations (including LCCs) in its switches along with any required trunk groups. At the time the LSR is sent to BellSouth for a particular AT&T end user, BellSouth will know the correct LCC to use.

Q. IN THAT SAME SITUATION, SUPPOSE AT&T DECIDES THAT FOR A PARTICULAR END USER WITHIN ITS FOOTPRINT, THE CUSTOMER'S OS/DA CALLS SHOULD BE SENT TO BELLSOUTH'S PLATFORM INSTEAD OF TO AT&T's PLATFORM. WILL BELLSOUTH KNOW HOW TO PROCESS AT&T's LSR WITHOUT AT&T INDICATING THE CORRECT LINE CLASS CODE TO USE?

A. No. While the routing that AT&T desires for a particular end user in this case is possible (assuming that AT&T had previously requested and BellSouth had built LCCs and associated trunk groups for these "exception" orders), only AT&T knows when it wants the default to apply (that is, the footprint is used) versus when it wants the exception to apply (that is, the exception routing plan). AT&T is free to have a default routing plan and as many different exception routing plans as it wants (within the technical limits of the switches). For the default routing plan, AT&T need not instruct BellSouth of which set of LCCs to

use. However, for end users for which AT&T desires that exception routing plans be used, AT&T must inform BellSouth of which set of LCCs to use.

Q. ON PAGE 32 OF HIS TESTIMONY, MR. BRADBURY STATES THAT BELLSOUTH PROVIDES NO PROCESSES FOR ELECTRONIC ORDERING OF CUSTOMIZED ROUTING FOR SPECIFIC END USERS. IS HE CORRECT?

A. No. Let me make clear however that here I am not discussing the initial establishment of the default footprint (the so-called infrastructure provisioning step). Instead, I am discussing the situation where AT&T has previously requested and BellSouth has provided required LCCs and associated trunk groups. Then, AT&T sends its LSR for a given end user and does not denote on its LSR that any exception routing is to be used (that is, the default routing plan is to be used). BellSouth's electronic ordering processing for CLECs' orders can handle this situation. BellSouth completed work and installed changes in its electronic gateway on November 18, 2000. This is referred to as Change Request EDI 020900 that was incorporated into Release 8.0. Despite an admittedly confusing memorandum sent to CLECs on October 11, 2000, the change was made on November 18, 2000, as had been previously scheduled.

Q. ON PAGE 34 OF HIS TESTIMONY, MR. BRADBURY STATES THAT

YOU HAD PERSONALLY ISSUED A MEMORANDUM DIRECTING THAT THE DECISION BE REVERSED. HE ATTACHES A PORTION OF THE TRANSCRIPT FROM THE ARBITRATION HEARING IN GEORGIA. PLEASE COMMENT.

A. Mr. Bradbury mischaracterizes what I said. In his testimony he says that I had personally issued a memo directing that the decision (that is, the decision to drop Change Request EDI 020900 from Release 8.0) be reversed and that CLECs be so informed immediately. That is not correct. What I said during the Georgia hearing was "The first thing I did when I came in to work that morning and found that memo [that is, the memorandum attached to Mr. Bradbury's testimony as Page 3 of Exhibit JMB-8] was to find the people that had written that memo and had them in my office and had them retract that to show that the line class code method would be available." See page 6 of Exhibit JMB-7 attached to Mr. Bradbury's testimony. That was and is a true statement. The point of the clarification I sought via the second memorandum was to ensure CLECs that the LCC method of customized routing would be available even once BellSouth introduced the so-called Originating Line Number Screening (OLNS) branding method. The next statement I made during the Georgia hearing was "And I immediately set about making sure that the people doing the software upgrades [that is, Change Request EDI 020900 in Release 8.0] did not divert their attention and move that out of release 8.0." BellSouth and I were in fact successful in keeping EDI 020900 as part

of Release 8.0 and that software was successfully loaded and made available to CLECs on November 18, 2000.

Q. REGARDING THE ELECTRONIC ORDERING CAPABILITY PROVIDED WITH CHANGE REQUEST EDI 020900, ON PAGE 36 OF HIS TESTIMONY, MR. BRADBURY STATES "THUS, BELLSOUTH PLANS TO PROVIDE ONLY A VERY LIMITED TRIAL VERSION OF THE PRODUCTION FUNCTIONALITY THAT WAS CANCELLED." IS HE CORRECT?

A. No. BellSouth stands ready to implement as large a customized routing footprint as AT&T desires and the software upgrades included in Change Request EDI 020900 can accommodate such. To date, however, AT&T's self-imposed footprint is very small. Mr. Bradbury's statement on page 35 of his testimony that no CLEC other than AT&T can use the electronic ordering capability provided is misleading. No other CLEC has requested that BellSouth provide it the LCC method for customized routing, thus no customized routing footprint exists for any CLEC other than AT&T. The same capability that is available to AT&T for the electronic processing of its LSRs is available to every other CLEC. Upon request, BellSouth will establish any CLEC's customized routing default footprint reflecting that CLEC's choices for treatment of its end users' OD/DA calls. Then BellSouth can handle that CLEC's LSRs for its end users on an electronic basis just as BellSouth can do for AT&T.

On page 37 of his testimony, Mr. Bradbury suggests that the Kentucky PSC order BellSouth to provide AT&T with an ordering capability that will allow AT&T to place individual customer orders electronically, utilizing a single region-wide indicator for each routing option, whereby the orders should flow through without the need to place additional indicators on its LSRs. In fact, BellSouth is already providing such functionality with the software upgrades put in place on November 18, 2000.

Q. WHAT DOES BELLSOUTH PROPOSE TO RESOLVE THIS ISSUE?

A. BellSouth asks this Commission to affirm that it has met its requirements for providing customized routing and that BellSouth is not required to provide operator services and directory assistance as unbundled network elements at cost-based rates.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

STATE OF Florida

COUNTY OF Leon

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ronald M. Pate, 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 "The Petition by AT&T Communications of the South Central States, Inc., and TCG of Ohio for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252," Commission Case No. 2000-465, and if present before the Commission and duly sworn, his rebuttal testimony would be set forth in the annexed transcript consisting of 81 pages and 7 exhibit(s).

Ronald M. Pate

SWORN TO AND SUBSCRIBED BEFORE ME this
14th day of Feb., 2001.

Tanya W. Lynn
NOTARY PUBLIC

Tanya W. Lynn
MY COMMISSION # CC673581 EXPIRES
September 8, 2001
BONDED THRU TROY FAIN INSURANCE, INC.

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF RONALD M. PATE

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

CASE NO. 2000-465

FEBRUARY 20, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed direct testimony – with exhibits – on February 6, 2001.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my rebuttal testimony is to address various concerns and issues raised in the direct testimony filed by AT&T – specifically that of

AT&T Witness Jay M. Bradbury – in areas related to Operations Support Systems ("OSS"). I will respond to Mr. Bradbury's allegations made against BellSouth in the following:

Issue 19 – Operator Services/Directory Assistance ("OS/DA")
Issue 22 – BellSouth's Change Control Process ("CCP")
Issue 23 – Specific changes to BellSouth's ordering and pre-ordering interfaces
Issue 24 – Specific improvements to BellSouth's maintenance and repair interfaces

I will show that, for each area listed above, BellSouth has taken positive steps to respond to AT&T's formal requests, *if doable and reasonable* – the same as BellSouth would do for any CLEC. Very simply, it is BellSouth's position that it is in compliance with current FCC and state commission orders and rulings with regard to its dealings with CLECs, and that BellSouth continues to monitor itself for such compliance in the face of an ever-evolving industry.

Issue 19: What procedures should be established for AT&T to obtain loop-port combinations (UNE-P) using both Infrastructure and Customer-Specific Provisioning?

Q. MR. BRADBURY CONTENDS ON PAGE 22 OF HIS TESTIMONY THAT BELLSOUTH HAS NOT SUPPLIED AT&T WITH ALL OF THE DETAILED TECHNICAL METHODS AND PROCEDURES THAT IT NEEDS TO IMPLEMENT OPERATOR SERVICES/DIRECTORY ASSISTANCE ("OS/DA") ROUTING. WHAT HAS BELLSOUTH PROVIDED TO AT&T IN REGARD TO OS/DA?

A. As I stated in my direct testimony, BellSouth provided AT&T with proposed contractual language for the three types of routings for its OS/DA calls (unbranded, branded and third-party platform). AT&T was given the unbranded contractual language in August 2000, and both the branded and third-party platform contractual language in October 2000. Each document provides the process for establishing the AT&T "footprint order" for that particular option, and these three documents were provided together as Direct Exhibit RMP-2.

Additionally, Mr. Bradbury states in a footnote on Page 34 that "AT&T has yet to receive footprint ordering instructions from BellSouth". BellSouth, in fact, provided the user requirements for the unbranded OS/DA option – with ordering instructions – to AT&T mid-November 2000 in response to their actual request for that option for a specific project – the so-called "friendly test" to which he refers on Page 35. In fact, that test is the only request that AT&T has made of BellSouth for the actual provisioning of OS/DA routing. The User Requirements document was provided as Direct Exhibit RMP-3.

Mr. Bradbury also claims that BellSouth “has not produced detailed technical methods and procedures sufficient to inform AT&T of requirements for ordering customized routing”. The aforementioned User Requirements document provides that information for the only firm request that AT&T has made to BellSouth for the provisioning of OS/DA routing.

Q. WHAT OTHER INFORMATION DOES BELLSOUTH THINK THAT AT&T NEEDS TO ESTABLISH THE “FOOTPRINT ORDER” AND CUSTOMER-SPECIFIC PROVISIONING FOR UNBRANDED OS/DA?

A. BellSouth believes that it has furnished AT&T with the information that it needs to establish its footprint orders. Basically, for each central office in which AT&T wants to pre-program various routings, it has to tell BellSouth what it wants to do. That is, does AT&T want to route a call to a BellSouth OS/DA platform, or does it want to route the calls to an AT&T platform, or does it want to make some other choice. Mr. Milner can describe this in more detail, but the point is that if AT&T will tell us what they want to do in a particular central office, we will work with them and get the programming accomplished. That is conditional upon AT&T’s willingness to pay for this service, which AT&T has indicated is acceptable. To the extent that AT&T needs more formal information before launching these activities, I understand that Mr. Milner and others have been working directly with AT&T to satisfy its concerns.

Q. MR. BRADBURY STATES ON PAGE 32 OF HIS TESTIMONY THAT BELLSOUTH PROVIDES NO PROCESSES FOR ELECTRONIC ORDERING OF CUSTOMER-SPECIFIC OS/DA. IS THAT TRULY THE CASE?

A. Definitely not. This is actually a different aspect of this issue than I discussed above. Once AT&T tells us which central offices it wants to pre-program so its subscribers can reach the OS/DA platform that AT&T wants for that customer, AT&T then has to submit an individual customer order, a Local Service Request ("LSR") so that we can provide service to that specific end-user. AT&T wants to be able to submit this request electronically, and BellSouth has arranged for AT&T to do so.

Mr. Bradbury cites on Page 32 AT&T's formal change request (EDI020900_001 – Electronic Order Routing to OS/DA) submitted in February 2000, and this is the same change request for which BellSouth implemented the OS/DA unbranded option as part of Release 8.0 on November 18, 2000. Because of this implementation, orders issued by AT&T for its specified project can be submitted electronically by simply following the BellSouth business rules for ordering port/loop combinations. No special or additional entries are required on the LSRs.

Q. IN HIS TESTIMONY, MR. BRADBURY MAKES REFERENCES ON PAGES 32 THROUGH 36 REGARDING BELLSOUTH'S "UNILATERAL DECISION" TO REMOVE THIS FEATURE FROM RELEASE 8.0. SINCE

THE FEATURE HAS BEEN IMPLEMENTED, WHY DOES HE STILL ADDRESS THIS?

A. It is unclear why Mr. Bradbury continues to make an issue of a decision that occurred through some miscommunication, but that was never implemented. BellSouth has acknowledged that it mistakenly decided and communicated that the feature would be removed from Release 8.0. More importantly, however, immediate action was taken when the situation was brought to Mr. Keith Milner's and my attention. The release occurred as scheduled with all of the parts necessary to allow electronic ordering as requested by AT&T.

I will note, however, that Mr. Bradbury does have one point here that is correct. AT&T had requested this functionality for a specific central office (Atlanta – Peachtree Place), and the Release 8.0 software package that was implemented was intended to allow AT&T's electronically-placed service requests to flow through BellSouth's provisioning systems and generate service orders with the proper information to route AT&T's end users to the unbranded OS/DA option.

Concurrent with – but separate from – the Release 8.0 programming, work was supposed to be done in the Peachtree Place central office that would allow the downstream service orders generated from AT&T's service requests to be worked in the Peachtree Place central office for each end user. Unfortunately, the programming in the Peachtree Place central

office was done incorrectly, which prevented the OS/DA routing from operating as intended. While that is regrettable, and BellSouth would have certainly preferred that it not happen, central offices are nothing but huge computers and when their programming is changed, sometimes there are problems – specifically human error in this situation. Unfortunately, it was the first time that we tried to implement the program, and there was a problem.

The fact that we had a problem, however, does not mean that we have not tried to accommodate AT&T's request with regard to this issue. We are using our best efforts to accommodate AT&T's requests and will continue to do so. Quite frankly, given these circumstances, it is not at all clear what they want the Commission to do with regard to this issue.

Q. ON PAGE 37, MR. BRADBURY INDICATES THAT HE IS NOT CERTAIN THAT THE AFOREMENTIONED SITUATION HAS BEEN CORRECTED. PLEASE PROVIDE THAT ASSURANCE.

A. The situation was indeed corrected on January 13, 2001, as indicated in the letter from Mr. Milner and Mr. Pate to which Mr. Bradbury refers. Mr. Bradbury goes on to refer to notice from BellSouth's AT&T account team that the testing of OS/DA by AT&T cannot take place until AT&T signs an amended test agreement for Phase 4 of the trial under which OS/DA is to be tested. That is a true statement, and one of which AT&T's testing manager has been aware all along. In fact, the testing manager has

indicated to BellSouth that he has not sent any OS/DA-related test scenarios because he knew the amended agreement had not been signed for Phase 4 of the test.

I would also like to note that AT&T recently requested an extension for Phase 3 of the test until March 31, 2001. That means that Phase 4 (which is the testing of OS/DA) will not begin prior to early April. It is not clear to BellSouth why AT&T is conveying such a sense of urgency in this matter when it is not yet ready to test our capability itself.

Q. WHAT DOES BELLSOUTH UNDERSTAND TO BE THE REAL ISSUE WITH REGARD TO ELECTRONIC ORDERING OF ACCESS TO OS/DA?

A. The real issue has recently become very clear. BellSouth has a single default routing for its OS/DA traffic. We route our calls to a BellSouth platform where a BellSouth operator answers the call. There is nothing special that has to be done when a BellSouth subscriber orders service. The order automatically defaults to that routing. Since AT&T is entitled to parity, we have offered to AT&T, the ability to select a “default”, just like BellSouth has, for its OS/DA routing. Indeed, we have gone further than that. We have offered to give AT&T a different “default” in each state in which we operate.

That just isn’t good enough for AT&T. Instead, AT&T wants to be able to select from among as many as four options for each of its subscribers and

it wants BellSouth to do the programming, at BellSouth's expense, that will allow AT&T to accomplish this result without any effort on AT&T's part. Parity doesn't require BellSouth to do this. Indeed, our review of the situation indicates that it would require major work on our own operations systems to accomplish this. AT&T has shown no willingness to pay for this, and BellSouth is not obligated to do it.

Q. DOES THAT MEAN THAT ALTHOUGH AT&T MIGHT WANT TO CHOSE FROM AMONG AS MANY AS FOUR ALTERNATIVES FOR ITS INDIVIDUAL CUSTOMERS' OS/DA SERVICE, BELLSOUTH IS DICTATING THAT AT&T MUST CHOSE A SINGLE DEFAULT?

A. Absolutely not, and that is one of the more frustrating points associated with this issue. Mr. Milner can explain this better than I can, but, basically, AT&T can have whatever choices it wants for its customers' OS/DA traffic. Each option that AT&T selects requires a different trunk group in each central office to get the calls to the place for which they are destined. In order to point the calls to the right trunk groups, line class codes are used. These are essentially computer instructions that tell the computer where to send the call. We can program our switches to automatically select one routing, or a "default." If AT&T wants to select another routing for a particular customer, it can, if it provides us with the appropriate line class codes for that particular routing in the central office from which the customer is served. The only dispute here is who has to provide the line class codes in such a situation. AT&T does not want its service

representatives to have to take the time to put the line class codes on orders that vary from the "default." BellSouth doesn't believe that it is obligated to do so on AT&T's behalf in these circumstances.

Q. PLEASE SUMMARIZE YOUR COMMENTS ON THE OS/DA ISSUE.

A. This issue continues to be a problem for which there seems to be no viable solution that will satisfy AT&T. Mr. Milner once again discusses the issue in his direct and rebuttal testimony, but the bottom line is that we have furnished AT&T the information necessary to do electronic ordering in the one case where AT&T has indicated a desire to do so. AT&T seems to want something more, which, as Mr. Milner describes, is beyond the pale.

Based upon AT&T's requests for documentation and availability of all OS/DA options in all locations, it is clear that AT&T would like for BellSouth to equip all central offices in BellSouth's nine-state region with all of the OS/DA options in the unlikely event that a CLEC (more precisely, AT&T) *might* want to place orders at any time and at any place. That simply isn't feasible based upon an overall lack of CLEC demand for OS/DA options, nor is it viable from a financial standpoint. While providing OS/DA options on an as-requested basis may not suit all of AT&T's requests, BellSouth nonetheless has a reasonable process for providing OS/DA. AT&T's opinion of what is reasonable for BellSouth to do on a region-wide basis is simply that – its opinion.

I would like to reiterate from my direct testimony that BellSouth has made that process available to all CLECs, and posted that information on BellSouth's Interconnection Services website via Carrier Notification SN91082004 on November 22, 2000 (Provided as Direct Exhibit RMP-4). Per the instructions in the Carrier Notification, inquiries for this feature may be made to the CLECs' account team representative.

Q. IN HIS SUMMARY ON PAGE 37, MR. BRADBURY ASKS THE COMMISSION TO ORDER BELLSOUTH TO PROVIDE AT&T WITH SPECIFIC DOCUMENTED METHODS AND PROCEDURES FOR EACH OF THE CUSTOMIZED ROUTING METHODS. DO YOU HAVE COMMENTS ON THAT REQUIREMENT?

A. Yes. As BellSouth provided AT&T with the appropriate methods and procedures for the unbranded option at such time as they made an actual request for BellSouth to provide that option, so, too, would BellSouth provide the same for either of the other two options based upon the specificity of AT&T's request.

Q. WHAT WOULD YOU LIKE FOR THE COMMISSION TO DO IN RESPONSE TO AT&T'S ALLEGATIONS?

A. Find that BellSouth has responded to AT&T's change request to implement electronic ordering for OS/DA capability based upon the

parameters of its specified project, and the process doesn't require AT&T to place any special indicators on its LSRs. In addition to documentation given to AT&T for this project, BellSouth has also provided instructions on how to obtain other options of OS/DA routing for future requests, and has made that same information available to the general CLEC community. BellSouth believes it has satisfied what Mr. Bradbury outlines in his summary request of this Commission.

Issue 22: Should the Change Control Process be sufficiently comprehensive to ensure that there are processes to handle at a minimum the following situations:

a) introduction of new interfaces

b) retirement of existing interfaces

c) exceptions to the process

d) documentation, including training

e) defect correction

f) emergency changes (defect correction)

g) an eight-step cycle, repeated monthly

h) a firm schedule for notifications associated with changes initiated by BellSouth

i) a process for dispute resolution including referral to state utility commissions or courts

j) a process for escalation of changes in process

k) testing support and a testing environment

l) provision for a trouble number for Type-1 events

m) a process for the cancellation, rejection or reclassification of CLEC change requests

n) a process for prioritization and assignment of change requests to future releases for implementation

o) a process for changing the process

Q. ON PAGE 51 OF MR. BRADBURY'S TESTIMONY REGARDING BELLSOUTH'S CHANGE CONTROL PROCESS ("CCP"), HE CLAIMS THAT BELLSOUTH'S CCP IS INADEQUATE. WOULD YOU PLEASE RESPOND TO THAT CLAIM?

A. Yes. I will start by reiterating BellSouth's position from my direct testimony that the Change Control Process is not a proper issue for arbitration with an individual CLEC before an individual state authority. The CCP covers BellSouth's regional interfaces and processes, and affects a CCP membership of what has grown to approximately 100 CLECs. Collaborative decisions that come from issues submitted to the CCP ultimately affect over 300 CLECs that are currently actively operating in BellSouth's nine-state region (Note: There are over 1,600 commission-approved CLECs around the region). As I stated in my direct testimony on Page 23, our position is supported by the North Carolina Public Service Commission's Staff proposed recommended order from similar arbitration proceedings which states that "this arbitration docket is an inappropriate

forum for consideration of wholesale modifications to the CCP or the CCP document, as proposed by AT&T."

Moving beyond this, however, the issue of the adequacy of BellSouth's CCP also is being addressed by KPMG, the company approved by the Florida and Georgia Public Service Commissions to perform Third Party Testing per the orders of those Commissions. BellSouth believes that determination of adequacy of the CCP can be properly assessed and documented as part of the Third Party Testing process currently taking place in Florida and Georgia.

Q. MR. BRADBURY FURTHER STATES ON PAGE 57 OF HIS TESTIMONY THAT BELLSOUTH'S CCP IS "NOT COLLABORATIVE". WHAT IS BELLSOUTH'S VIEW OF THE COLLABORATIVE NATURE OF THE CCP?

A. The process is clearly "collaborative." It is just not subject to the control of AT&T, which is Mr. Bradbury's real issue. Mr. Bradbury insists that the CCP document Version 2.0 is the appropriate document to discuss in this arbitration, as he states on Page 65 of his testimony. However, while explaining how the Commission should order adoption of AT&T's proposed "red line" Version 2.0, he fails to mention that AT&T's document was later submitted to the CCP formally as a change request (as AT&T should have done earlier, according to the CCP rules regarding changes to the process), and that a decision was made within the CCP (and not

just at BellSouth's insistence, as Mr. Bradbury alleges in his footnote on Page 53 of his testimony) to develop a sub-team of CLECs to collectively build upon AT&T's original proposed changes, and to present a joint CLEC proposal to the total CCP membership. AT&T's regular representative to the CCP agreed to the suggestion, and also agreed to head the effort. What is missing from Mr. Bradbury's testimony is the part about BellSouth having the opportunity to respond to this joint CLEC proposal. It is not clear how BellSouth and the other CLEC's could be acting more "collaboratively". We just are not doing precisely what AT&T wants, which evidently makes us "non-cooperative."

As I discussed in detail in my direct testimony, BellSouth submitted its proposed changes to CCP document Version 2.0 to the sub-team on December 5, 2000, and that document – which includes both the CLEC-proposed changes and BellSouth's agreement, disagreement or compromise proposal to those changes – was the document that was under review by the sub-team. It was provided as Direct Exhibit RMP-19.

I also mentioned in my direct testimony that a new version of the CCP document Version 2.1 with a number of agreed-upon and voted-for changes would be posted to the CCP website on or about February 9, 2001, and I included a ***draft*** copy as Exhibit RMP-23. That posting, in fact, occurred on February 9, and I have provided that posted ***final*** version as Exhibit RMP-36. Additionally, the CCP will continue to maintain a marked-up version of the 2.1 document as a "working version" (provided

as Exhibit RMP-37). Its intent is to indicate those issues that still remain open from the original version of 2.0 (Direct Exhibit RMP-19) that contained both the CLEC- and BellSouth-proposed changes. I will refer to these documents (Exhibits RMP-36 and RMP-37) later in this testimony to show the Commission that AT&T's various claims of inadequacy and non-collaborative process cannot be supported.

In addition to KPMG's Third Party Testing assessment and documentation of BellSouth's CCP, the current sub-team activity suggests that the CLECs *and* BellSouth are interested in working toward solutions and compromises that *improve the current* process and are acceptable to the industry *as a whole*. The point is that the CCP is an evolving process, and BellSouth feels it is more appropriate to look at the current and future direction of the CCP rather than simply acceding to AT&T's demands, which is evidently all that will satisfy AT&T in this regard.

Q. MR. BRADBURY ALSO CLAIMS ON PAGE 57 THAT BELLSOUTH HAS TOTAL CONTROL AND VETO POWER OVER THE CCP, AND "MAY SIMPLY IGNORE THE BUSINESS NEEDS AND WISHES OF THE CLEC COMMUNITY". HOW DO YOU RESPOND TO THIS CLAIM?

A. What he really means is that there isn't a line in the CCP that indicates that whatever AT&T wants, it gets, irrespective of whether the request is reasonable or even concurred in by the rest of the affected CLECs. As part of the CCP's collaborative effort – where consensus is required to

make decisions – BellSouth and the CLECs have made a concerted effort to incorporate all reasonable and doable requests for changes. That is reflected in the current CCP document Version 2.1 (Exhibit RMP-36). AT&T apparently feels that BellSouth has no rights as a stakeholder in this process, and should automatically acquiesce to CLEC requests even if those requests fall outside of BellSouth's obligations under FCC orders, are not doable under BellSouth's current processes, or require BellSouth to make substantial financial investment for a limited potential utilization by the CLEC community as a whole.

BellSouth follows the review process as stated in the CCP guidelines for all change requests submitted by CLECs, and responds via the CCP in what it feels is the appropriate manner, and gives appropriate consideration to each such request. The idea that BellSouth has final veto power is addressed by the CCP guidelines for dispute resolution as I explained fully in my direct testimony. Suffice it to say here that the option exists for AT&T or any other CLEC to take a dispute to a higher authority for resolution, if necessary. The dispute resolution process – while it does exist in the current CCP document Version 2.1 – is still under review by the CCP because of some fundamental concerns by both parties about the suggested language.

Q. CAN YOU GIVE US AN EXAMPLE OF WHAT YOU MEAN?

A Certainly. In fact, AT&T has raised a perfect example in one of our recent arbitrations. Specifically, in considering changes to the CCP, BellSouth and the CLECs had 34 issues that were under consideration and that were submitted for a vote. Twenty-seven of the changes were adopted. There was disagreement between BellSouth and the CLECs with the remaining seven. An example of one of these seven issues over which the CLECs and BellSouth disagreed is issue 34, which dealt in part with the dispute resolution process. Basically, the section of the CCP that was involved allowed parties to a dispute to seek mediation or, if they chose, to simply go straight to a commission for resolution of the issue. The disagreement between the CLECs and BellSouth was pretty simple. The CLECs wanted to add a sentence to the section that required BellSouth to notify every CLEC of a proposed mediation or a formal complaint. The BellSouth version had an additional sentence in it that provided that if a dispute was taken to mediation and resolved, that the resolution would be binding on all CLECs with the same issue.

The CLECs obviously disagreed with BellSouth's position because without the sentence, every CLEC would get its own bite at the apple. It is sort of like the way that AT&T is taking the issues of the CCP to every state commission, hoping to find just one that will agree with AT&T about the CCP. With regard to the dispute resolution, if eight CLECs all had the same problem, under their approach to the problem, they could seek mediation one at a time, hoping that one could find a favorable mediator. Common problems need to be handled efficiently. Trying a case over and

over again because one of the players keeps hoping to get a better result just does not make much sense.

I want to reiterate, however, that BellSouth does not have the final word on this issue. The CCP has a dispute resolution process in it. If the group of CLECs that were supporting the CLEC version of issue 34 think that they can get a state commission to approve language that would allow piecemeal approaches to problems, then they ought to use the escalation process to test that. BellSouth is more than willing to defend the reasonableness of its position. It will be interesting to see whether the CLECs feel the same way.

Q. MR. BRADBURY CONTENDS ON PAGE 58 OF HIS TESTIMONY THAT BELLSOUTH DID NOT COMPLY WITH A CCP REQUIREMENT THAT "SIZING AND SEQUENCING OF PRIORITIZED CHANGE REQUESTS WILL BEGIN WITH THE TOP PRIORITY ITEMS AND CONTINUE DOWN THROUGH THE LIST UNTIL THE CAPACITY CONSTRAINTS HAVE BEEN REACHED". ARE YOU FAMILIAR WITH THIS SITUATION?

A. Yes. Mr. Bradbury is again referring to Release 8.0, which was implemented on November 18, 2000, and contained several low-priority items, along with several high-priority items. Although some "low-priority items" were included in the release, this in no way impacted whether other high-priority items could have been included. In many instances during major releases, there are changes that can be made with very little

expenditure of time and/or money, or without extensive software development. Since the low-priority items are on the list to be worked at some point anyway, it makes perfect sense to include all that can be included without jeopardizing implementation milestones, which would have been the case had BellSouth tried to include too many of the high-priority items. Filling out a release with "easy-to-accomplish" items, even if they are low priority, only makes sense. Release 8.0 could have been implemented without the "low-priority items" but no additional "high priority" items would have been included as a result. That doesn't make much sense, but is typical of the sort of complaint that AT&T seems intent on making until it finally just gets its own way.

Mr. Bradbury would have this Commission believe that BellSouth does this in an attempt to delay or harm the CLECs' ability to compete, and that simply isn't the case. I will further add that it has long been the procedure to rely on the use of "point" releases (e.g., 8.1, 8.2, etc.) to pick up additional high- and low-priority items without waiting for the next major release (e.g., 9.0, 10.0, etc.).

Q. MR. BRADBURY FURTHER ASSERTS ON PAGE 59 THAT BELLSOUTH "ROUTINELY ELECTS NOT TO COMPLY" WITH THE CCP'S REQUIREMENTS, USING AS AN EXAMPLE THE RELEASE OF ISSUE 9G OF BELLSOUTH'S BUSINESS RULES FOR LOCAL ORDERING, WHICH HE CLAIMS WAS DONE WITH LITTLE ADVANCE NOTICE TO CLECs, THAT BELLSOUTH REFUSED TO WITHDRAW

THE CHANGES, AND THAT THE RELEASE CONTAINED PROGRAMMING DEFECTS THAT COULD HAVE BEEN AVOIDED HAD BELLSOUTH MADE THE RELEASE AVAILABLE TO CLECS FOR PRE-TESTING. WHAT IS YOUR RESPONSE?

A. First, let me say that BellSouth does not "routinely" elect not to comply with the CCP's requirements. With that said, it appears that AT&T has managed to identify one situation where BellSouth should have run a release through the CCP and failed to do so. This was Issue 9G of the BellSouth Business Rules for Local Ordering ("BBR-LO"). We posted the notice on August 31, 2000, to be effective October 2, 2000, thus providing the requisite notice. We did not, however, properly process the matter through the CCP. This occurred simply because the release was primarily intended to correct defects in documentation that had previously been identified and the people responsible evidently thought that since the release was primarily to correct matters that had already been identified as errors, processing it through the CCP again wasn't necessary. However, in addition to the documentation changes, there was one minor software change also included in the release.

Unfortunately, and as AT&T knows, there was a problem with the software change which was corrected soon thereafter. Our rationale for going forward with the release of the documentation changes, which is no excuse for not following the process, was that the documentation changes were corrections to existing documentation, which should not have been

anything other than a ministerial task, and was for the purpose of benefiting the CLECs who rely on the documentation that was being corrected. This is not, however, a systemic problem that I am aware of. Given AT&T's penchant for documenting alleged problems, one would assume that if this were a regular and constant problem, they would have reams of examples. I do not believe this is the case. Our company is committed to following the CCP. We have agreed to language that requires us to do so. I wish I could guarantee that we would never make a mistake, but that would simply be unreasonable. We are committed to using our best efforts to make this process work, and we believe that on the whole it does.

Q. STARTING ON PAGE 59 OF HIS TESTIMONY, MR. BRADBURY MAKES A SERIES OF ADDITIONAL ALLEGATIONS THAT BELLSOUTH HAS THE POWER TO IGNORE THE REQUIREMENTS OF THE CCP. WHAT IS YOUR RESPONSE?

A. Mr. Bradbury continues to be obsessed with the notion that BellSouth has total control and power in the CCP, and that just isn't true. Regarding his statement on Page 60 at line 7 that BellSouth "unilaterally decided to establish a new, additional meeting it calls the 'CCP Process Improvement Meeting,'" BellSouth simply made a suggestion that, because of the scope and magnitude of AT&T's change request for changing the CCP document, it should possibly be handled by a CLEC subcommittee. The suggestion (along with the name 'Process Improvement') received the

blessing of the CCP, and BellSouth was also invited to participate. As I stated in my direct testimony, AT&T's own CCP representative agreed to facilitate the subcommittee. Since the CCP document affects the entire CLEC community (not just AT&T) as well as BellSouth, the idea of a multi-CLEC subcommittee made absolute sense.

When Mr. Bradbury says at line 23 that BellSouth at the November 1, 2000 meeting “effectively deferred meaningful discussion of CR[0]171 until a meeting to be held on December 7, 2000”, he conveniently ignores the fact that it had been agreed that BellSouth would have a chance to review the changes agreed upon by the CLECs at the October 17 and 27, 2000 meetings. He would have the Commission believe that BellSouth had agreed to accept whatever changes were given to BellSouth with no questions asked. Mr. Bradbury even says himself that BellSouth did not receive the document with the changes until November 5, 2000.

At line 16 on Page 61, Mr. Bradbury complains that BellSouth did not respond to the CLECs until late on December 5, 2000. What he apparently does not understand is that all of the changes suggested by the CLECs are not within the decision-making jurisdiction of BellSouth's CCP representatives. It is clear that requests for shortened intervals, for example, can affect a wide range of departments and processes, and determining BellSouth's agreement or disagreement with proposed changes for this example as well as others necessarily requires input from

all parties that are involved. BellSouth provided that response as soon as it was able to do so.

On Page 62 at line 13, Mr. Bradbury suggests that BellSouth should have already issued change requests for changes in the existing CCP document Version 2.0 to which it has agreed. While BellSouth might have agreed in principle to certain of the proposed changes, BellSouth has said all along that once the entire set of changes has been jointly agreed upon within the entire CCP (not just between BellSouth and AT&T), it will issue one change request for issuance of the entire revised version of the CCP document. To do otherwise would be unduly burdensome on BellSouth and the CCP change request review process.

Q. ON PAGE 53 OF MR. BRADBURY'S TESTIMONY, HE STATES THAT THE CURRENT CCP "FAILS TO COVER ALL AREAS THAT SHOULD BE INCLUDED IN A ROBUST CHANGE CONTROL PROCESS" PER THE FCC'S GUIDANCE. WHAT IS BELLSOUTH'S OPINION OF COVERAGE OF THE AREAS SPECIFIED BY MR. BRADBURY?

A. BellSouth cannot find one area listed by Mr. Bradbury that isn't covered by BellSouth's CCP document Version 2.0, and, now, the newly posted Version 2.1 and the 'working version" 2.1. He also inexplicably refers to the I-CCP, and regardless of whether he means the original interim CCP or an earlier version of the CCP document, the reference has no relevance in a discussion of the recent Version 2.0 or the now-current

Version 2.1. Mr. Bradbury also uses the phrases ‘does not adequately cover’ or ‘does not provide an adequate process for’ as he delineates the areas that he purports are deficient. Those phrases certainly represent AT&T's highly subjective opinions of those areas of the CCP. However, in spite of AT&T's opinions about the current CCP document, BellSouth firmly believes that the newly-posted CCP document Version 2.1, along with the ‘working document” containing both CLEC- and BellSouth-proposed changes that continues to be reviewed by the CCP sub-team will ultimately become the document that best serves the interest of the CLEC community as a whole, as well as BellSouth. The consensus acceptance of the proposed document as the new baseline document should render AT&T's complaints and allegations moot. Moreover, consider this additional point: There are dozens of arbitrations going on around the BellSouth region at this point. AT&T is the only CLEC that is making the CCP an issue in the detail that is being presented here today. The CCP may not meet AT&T’s subjective standards (more of the “not-invented-here” syndrome, probably), but clearly any number of CLECs are using the system, without the incessant complaining that seems to have become AT&T’s hallmark.

Q. BEGINNING ON PAGE 66 OF MR. BRADBURY’S TESTIMONY, HE MAKES ALLEGATIONS REGARDING EACH OF THE SUB-ISSUES OUTLINED AT THE HEAD OF THIS ISSUE SECTION. HOW WILL YOU RESPOND TO EACH SUB-ISSUE?

A. In the preceding answer, I addressed Mr. Bradbury's general statements regarding these sub-issues. As Mr. Bradbury has done beginning on Page 66 of his testimony, I will address each sub-issue in order and with more specificity. Although CCP document Version 2.0 (dated August 23, 2000) was the current operational document at the time of the filing of the direct testimony, CCP document Version 2.1 (dated February 9, 2001) has since been posted to the BellSouth Interconnection website.

BellSouth believes that it is more instructive and forward-looking to consider the newly posted Version 2.1 document (Exhibit RMP-36) and the document with both the CLEC- and BellSouth-proposed changes (Exhibit RMP-37). The Commission will please note that the "working version" also contains many agreed-upon items that have not been posted yet because the items are sub-sets of larger sections that are still considered to be open for further discussion within the CCP.

No doubt AT&T would prefer to continue looking only at the August 23, 2000 document and the CLEC-proposed changes in an effort to minimize the amount of collaborative effort put forth by BellSouth in an attempt to better respond to the CLEC community as a whole, but if the Commission is going to look at this document, it ought to look at the most current version or at least at the language that has been agreed to by the majority of the participating CLECs.

(NOTE: Beginning with sub-issue *k*, and continuing through sub-issue *o*, Mr. Bradbury has deviated from the sequence of sub-issues as outlined in the filed issues matrix. I elect to address them in the order as filed.)

a) Introduction of new interfaces

Q. MR. BRADBURY STATES ON PAGE 67 OF HIS TESTIMONY THAT LANGUAGE PROPOSED BY BELLSOUTH WOULD ALLOW ONLY BELLSOUTH TO DETERMINE WHETHER CHANGES TO NEW INTERFACES SHOULD BE MANAGED UNDER THE CCP DOCUMENT. PLEASE RESPOND.

A. The language actually states on Page 43 of Exhibit RMP-36 that changes to new interfaces would, in fact, be managed by the process. Further, any new interfaces deployed by BellSouth will be introduced to the CLEC community as part of the CCP. This is consistent with my statements on Page 60 of my direct testimony.

Q. IN AN EFFORT TO CONVINCE THE COMMISSION THAT THE DEVELOPMENT AND INTRODUCTION OF NEW INTERFACES SHOULD FALL UNDER THE CCP, MR. BRADBURY CLAIMS ON PAGE 68 OF HIS TESTIMONY THAT BELLSOUTH HAS ENGAGED IN SECRETIVE DEVELOPMENT OF NEW OSS INTERFACES, SPECIFICALLY BELLSOUTH'S LOCAL NUMBER PORTABILITY

GATEWAY AND ITS ASSOCIATED PROCESSES. WHAT IS WRONG WITH HIS CLAIM?

A. Frankly, BellSouth is baffled by Mr. Bradbury's choice of the phrase "secretive development of new OSS interfaces" as he relates it to the Local Number Portability ("LNP") Gateway. I need to work backward with that phrase to show its lack of merit.

First, the LNP Gateway is not an interface, but rather a data communications server – with its own processor and memory – that provides access between processes that use different access protocols. A CLEC would utilize Electronic Data Interchange ("EDI") or Telecommunications Access Gateway ("TAG"), for example, as the actual interface over which to pass LNP service requests to the LNP Gateway. Simply put, the LNP Gateway accepts a stream of data containing information from an incoming local service request ("LSR") for LNP from one of the CLEC interfaces or from a BellSouth representative inputting a manual order. The Gateway then reformats that data into the Telecommunications Industry Forum ("TCIF") standard. From that point, the LNP Gateway serves as the control point for any transmission of additional information regarding that request to and from the CLEC, other downstream BellSouth provisioning systems, and the Number Portability Administration Center ("NPAC"), to name a few.

Secondly, the LNP Gateway is not new. It was established over two years ago as the “back-room” process used to provide number porting capability to the CLECs. Development of the LNP Gateway was prior to the formation of the CCP, and, as a “back-room” system, is not itself technically subject to the CCP.

Thirdly, its development was hardly secret, inasmuch as its development was required in response to regulatory mandates requiring ILECs to provide local number porting capability to CLECs.

BellSouth accepts change requests (“CR”) through the CCP for enhancements and/or defect corrections to the *process* of issuing service requests for LNP. Some of those CRs will appropriately affect the LNP Gateway operation.

Q. MR. BRADBURY CONTINUES BY PROVIDING TWO EXAMPLES OF HOW AT&T'S CUSTOMERS HAVE ALLEGEDLY BEEN VICTIMIZED BY SUCH SECRECTIVE DEVELOPMENT. WHAT IS YOUR RESPONSE?

A. The examples of customer problems that Mr. Bradbury provided were the result of failures in two of BellSouth's downstream databases – the Calling Name, or CNAM, database, and ATLAS, the telephone number reservation database. As AT&T knows, those databases are common to both CLEC wholesale and BellSouth's retail operations, and neither is within the scope of the CCP. Regardless of that fact, however, BellSouth

accepts the responsibility to correct ANY database problems that affect ANY customer operations. The point relevant to this discussion, however, is that those repairs and notifications are handled through processes other than the CCP.

b) retirement of existing interfaces

Q. ON PAGE 71 OF MR. BRADBURY'S TESTIMONY, HE INDICATES THAT BELLSOUTH AND AT&T HAVE REACHED AGREEMENT ON A PORTION OF THIS ISSUE. DOES BELLSOUTH AGREE WITH HIS ASSESSMENT?

A. Mr. Bradbury is correct in his assessment of the issue as it relates to BellSouth and AT&T. However, it must be stressed that the CCP Version 2.1 document being presented for discussion as part of this proceeding is a document being used in the collaborative effort of the CCP. Thus, the language for this and any issue is subject to the CCP's final approval for this CLEC-wide issue.

c) exceptions to the process

Q. MR. BRADBURY STATES ON PAGE 71 OF HIS TESTIMONY THAT AT&T WANTS A DOCUMENTED "EXCEPTION" PROCESS FOR HANDLING TYPE 2-5 CHANGES UNDER UNUSUAL SITUATIONS, AND

THAT BELLSOUTH'S PROPOSAL IS UNACCEPTABLE. PLEASE RESPOND.

A. AT&T's desire to have an "exceptions" process is understandable – it would give AT&T an avenue to circumvent the process for all of the special "needs" it devises. In its proposal, AT&T offers no substantive information about what an "exception" might be, and BellSouth strongly believes that all of the situations that may come before the CCP are covered by one of the categories already defined in the process. The process does not need to add terms and/or categories that have no objective criteria to define them, thereby leaving their meaning open to interpretation.

d) documentation, including training

Q. MR. BRADBURY STATES ON PAGE 72 OF HIS TESTIMONY THAT CHANGES WHICH WILL RESULT IN REVISIONS TO THE TRAINING MATERIALS AND JOB AIDS BELLSOUTH PRODUCES FOR CLECS ARE INCLUDED WITHIN THE SCOPE OF THE PROCESS. PLEASE RESPOND.

A. I disagree. As I stated on Page 65 of my direct testimony, documentation defects related to business rules for manual and electronic processes for pre-ordering, ordering and maintenance are part of the CCP, and requests for remedy for such defects can be submitted through the change request

process, either by the CLECs or by BellSouth. The development of training materials and job aids for changes to these processes are handled by the appropriate BellSouth training development organization as the interfaces are enhanced through the CCP.

Q. MR. BRADBURY FURTHER MAKES A POINT ABOUT AN EXCEPTION REGARDING BELLSOUTH'S FAILURE TO DOCUMENT ITS TRAINING PROCESS THAT WAS ISSUED BY KPMG AS PART OF THE FLORIDA THIRD PARTY TEST. PLEASE COMMENT.

A. KPMG's Exception 9 dealt with BellSouth's "failure to have documented procedures for CLEC training management practices and program administration." This is different from the actual training materials and courses themselves, and has more to do with documentation issues regarding such subjects as BellSouth's qualification criteria for instructors. In other words, it is not about the training itself, but the types of things that go on behind the scenes. BellSouth is currently formalizing those procedures in response to the Exception, but the current lack of such is in no way preventing CLEC training from being delivered, or otherwise harming the CLEC community.

e) defect correction, and

f) emergency changes

Q. IN HIS TESTIMONY ON PAGE 72, MR. BRADBURY GROUPED THESE TWO CATEGORIES TOGETHER – STATING THAT IT IS APPROPRIATE TO DO SO – AND THAT ADOPTION OF AT&T'S PROPOSED CHANGES WILL PROVIDE A DOCUMENTED DEFECT CORRECTION AND EMERGENCY CHANGE PROCESS THAT MEETS THEIR NEEDS. DO YOU AGREE WITH THAT?

A. Not entirely. As I stated in my direct testimony on Page 67, it was BellSouth's understanding that the issue regarding the definition of a defect had been resolved after the addition of language which addressed AT&T concerns. Evidently AT&T's concerns continue to "evolve" as BellSouth responds to AT&T's comments. In fact, BellSouth continues to work to incorporate more of AT&T's suggested additions to the defect definition regarding requirement defects.

BellSouth believes a process currently exists within the CCP to deal with true emergencies, which are defined as system outages (Type-1 System Outage). For the type of "emergency" to which AT&T refers – a high-impact defect – BellSouth has agreed to an interval of two (2) business days to develop and validate a workaround to remedy those situations (See Exhibit RMP-36, Page 37, under Type-6 process flow). This represents an improvement from the current four- (4) day interval. From the point of development of a workaround, implementation of a true fix for the validated high-impact defect would occur within a 4-to-25-business-day range, with BellSouth committing to provide its best effort to minimize

the interval. BellSouth continues to work on improving this interval, but, at the present time, can only commit to this improvement.

Mr. Bradbury further states on Page 73 that the “Draft Expedited Feature Process” proposed by BellSouth is applicable neither to defect correction nor emergency changes. That would be appropriate, since the updated expedited feature process (Pages 28-32 of Exhibit RMP-36) is in response to the CLECs’ request that the expedited feature process be separated from the defect correction (Type-6) process.

g) an eight-step cycle, repeated monthly

Q. MR. BRADBURY STATES IN HIS TESTIMONY ON PAGE 74 THAT AT&T CONCURS WITH THE NUMBER AND SEQUENCE OF STEPS CONTAINED IN BELLSOUTH’S PROPOSED CCP DOCUMENT VERSION 2.0, FOR TYPES 2-5 CHANGE REQUESTS, BUT SAYS THAT AT&T STILL CONTINUES TO REQUEST REDUCED CYCLE TIMES. HOW DO YOU RESPOND?

A. BellSouth understands that AT&T has concurred in the number and sequence of steps. BellSouth has also made its own proposals in regard to the cycle times requested by AT&T in Mr. Bradbury’s testimony on Page 74, and, as is the case with the CCP “working version” document as a whole (Exhibit RMP-37), BellSouth's proposals for this section are being reviewed within the CCP.

While AT&T requests a reduction from 20 days to 10 days in the cycle time to review change requests for acceptance, BellSouth has responded that it feels that 20 days continues to be a reasonable and appropriate cycle time in order to review the potential impact on other systems, manual processes, documentation and training. Other steps include determining if a change request already exists, determining if it is a CLEC training issue, or determining if the request meets the criteria for an expedited feature. BellSouth wants to ensure that appropriate front-end planning occurs in order to minimize the possibility of defects later

The second cycle time Mr. Bradbury addresses involves a reduction from 30 to 25 days for the internal change management process step – the step where BellSouth and the CLECs analyze impacts, sizing efforts, etc., for change requests that have passed the CCP change request review process and have been designated as candidates for implementation. BellSouth has proposed a more workable solution (as outlined on Pages 27-28 of Exhibit RMP-37), since experience has shown that release schedules may not coincide with the 30- or 25-day interval. BellSouth has proposed that this step occur three-to-four months prior to a release – at the Release Package Meeting – in an effort to allow consideration and re-prioritization of new and/or non-scheduled change requests, without jeopardizing release milestones.

h) a firm schedule for notifications associated with changes initiated by BellSouth

Q. MR. BRADBURY STATES ON PAGE 76 OF HIS TESTIMONY THAT BELLSOUTH HAS REFUSED TO PROVIDE CLECS WITH DRAFT SPECIFICATIONS RELATED TO BELLSOUTH-INITIATED CHANGES. IS THAT TRUE?

A. Definitely not. It is more likely that AT&T didn't receive specifications as early as it would have liked. However, in BellSouth's proposed changes to CCP document Version 2.1 (Exhibit RMP-37, Page 20) still under review, BellSouth has addressed the notification schedule. BellSouth's proposed changes are as follows: user requirements for software releases (90 and 45 days advance notification for draft and final requirements, respectively); new Telecommunications Industry Forum ("TCIF") mapping (180 days advance notification for implementation release date, and 120 and 60 days advance notification for draft and final requirements, respectively); and retirement of interfaces (120 days advance notification for the retirement of old *versions* of interfaces).

In addition to these software- and system-related notifications, BellSouth has also proposed to provide *all* documentation 30 days in advance of the implementation of a change, whether system-affecting or non-system-affecting. Previously, non-system-affecting documentation changes were provided five (5) days in advance.

i) a process for dispute resolution including referral to state utility commissions or courts

Q. ACCORDING TO MR. BRADBURY'S TESTIMONY ON PAGE 76, THIS SUB-ISSUE SEEMS TO BE SATISFIED BETWEEN AT&T AND BELLSOUTH. DO YOU AGREE?

A. Yes, but it would appear that Mr. Bradbury's statement negates his own claim that BellSouth has total control and veto power over the CCP, as he claimed on Page 57 of his testimony, and as discussed earlier in this rebuttal.

j) a process for escalation of changes in process

Q. IN HIS TESTIMONY ON PAGE 77, MR. BRADBURY REFERS TO SPECIFIC INTERVALS THAT AT&T HAS ADDED FOR VARIOUS STEPS OF THE ESCALATION PROCESS. DO YOU OFFER ANY REBUTTAL FOR THIS SUB-ISSUE?

A. Not per se, but I would like to inform the Commission that BellSouth made its own proposal for reasonable and doable intervals for the escalation process that are currently incorporated in Exhibit RMP-36, Page 44. A review of Page 51 of Exhibit RMP-37 will reveal that there remain some minor changes in this section for consideration by the CCP sub-team.

k) testing support and testing environment

Q. ON PAGE 78 OF MR. BRADBURY'S TESTIMONY, HE COMPLAINS THAT BELLSOUTH'S PROPOSED VERSION 2.O OF THE CCP DOCUMENT DOES NOT CONTAIN AGREED-UPON LANGUAGE REGARDING TESTING SUPPORT. PLEASE RESPOND.

A. BellSouth has not included the language because the CLECs and BellSouth have agreed to re-evaluate this section for additional language modifications after the CLEC Test Environment has been implemented, as noted on Page 60 of the Working Document (Exhibit RMP-37). As I covered in depth in my direct testimony on this sub-issue, the Test Environment will allow CLECs other options for testing prior to the implementation of new releases to BellSouth's interfaces. To reiterate from my direct testimony, the target date for implementation of the CLEC Test Environment is March 31, 2001. There has been a slight alteration from my original testimony, however, as I had indicated that beta testing would have already occurred by that date. Beta testing now has been targeted for April 7 through April 20, 2001, with general availability to the CLEC community targeted for April 23, 2001.

l) provision of a trouble number for Type-1 events

Q. MR. BRADBURY STATES ON PAGE 79 OF HIS TESTIMONY THAT BELLSOUTH HAS AGREED TO PROVIDE THE TROUBLE NUMBER AS AT&T HAS REQUESTED, BUT THE LANGUAGE IS NOT REFLECTED IN VERSION 2.0. DO YOU AGREE WITH HIS STATEMENT?

A. I do agree that BellSouth will provide the trouble ticket number to the CLEC – a point that I covered in my direct testimony. However, that language has been included in the new CCP document Version 2.1 (Page 18 of Exhibit RMP-36), and should satisfy Mr. Bradbury's concerns on this sub-issue.

m) a process for the cancellation, rejection or reclassification of a CLEC change request

Q. AS YOU PREDICTED IN YOUR DIRECT TESTIMONY, MR. BRADBURY ON PAGE 79 OF HIS TESTIMONY HAS RAISED THE ISSUE OF AT&T'S CONCERN THAT BELLSOUTH HAS AN UNREASONABLE "UP-FRONT VETO POWER OVER ANY CHANGE REQUEST SUBMITTED BY CLECS," AND THAT CHANGE REQUESTS "SHOULD NOT BE SUBJECT TO THE ARBITRARY CANCELLATION OR REJECTION BY BELLSOUTH". WHAT IS YOUR RESPONSE?

A. I simply reiterate what I said in my direct testimony about this sub-issue. BellSouth has never acted irresponsibly upon CLEC change requests as AT&T implies, and, although the wording has not been changed with the

adoption of CCP document Version 2.1 (Exhibit RMP-36), BellSouth is conceptually receptive to AT&T's proposed changes. There are still some wording differences to be fine-tuned, and this is one of the areas that remains under discussion within the CCP. I have no reason to believe that this sub-issue cannot be settled.

n) a process for prioritization and assignment of change requests to future releases for implementation

Q. AS WITH THE PREVIOUS SUB-ISSUE, MR. BRADBURY, ON PAGE 80 OF HIS TESTIMONY, CLAIMS THAT THE PRESENT CCP "IS DRIVEN BY AN ARBITRARY RELEASE SCHEDULE DEVELOPED WITHOUT INPUT FROM THE AFFECTED CLECS AND THE CCP," AND IMPLIES THAT BELLSOUTH CONTROLS THAT PROCESS. PLEASE RESPOND.

A. Again, I go back to my direct testimony response and re-state that I disagree with the use of the terms "arbitrary" and "without input from the affected CLECs and the CCP". That disagreement notwithstanding, BellSouth believes that the concerns expressed in this sub-issue have been addressed and that agreement has been reached. Unfortunately, these Release Management items are part of a larger section of the CCP document that is still open. Therefore, no updates containing the agreed upon changes for this sub-issue have been posted.

o) a process for changing the process

Q. MR. BRADBURY ASSERTS ON PAGE 77 OF HIS TESTIMONY THAT NO PROCEDURE FOR AMENDING OR CHANGING THE CCP ACTUALLY EXISTS IN THE CURRENT CCP DOCUMENT. DO YOU AGREE?

A. No. As I stated in my direct testimony, Section 9.0 of the CCP Version 2.1 document does have instructions for requesting changes to the CCP. While I can agree with AT&T that some changes to this section are still under consideration by the CCP (Page 59 of Exhibit RMP-37), I'd like to remind Mr. Bradbury that AT&T itself did not adhere to the existing policy of submitting a change request when it first proposed the sweeping changes proposed in its initial marked-up version of the CCP document. Only after a request from the CCP to do so did AT&T submit change request CR0171 as a request to change the process. This section continues to remain open within the CCP, and will involve further discussion of Mr. Bradbury's proposed voting procedures that he discussed in his testimony.

Q. IN LIGHT OF MR. BRADBURY'S OVERALL ALLEGATIONS OF INADEQUACY AND THE NON-COLLABORATIVE NATURE OF BELLSOUTH'S CCP, WHAT WOULD BELLSOUTH LIKE FOR THE COMMISSION TO RULE REGARDING THE CCP?

A. First, BellSouth would like the Commission to conclude that this matter should be left to the collaborative process that BellSouth has shown to exist. Second, as the Florida and Georgia Commissions have ordered Third Party Testing, BellSouth proposes that the Commission allow that process to determine the adequacy of the CCP, if it has any concerns about simply leaving the matter to the existing CCP process**.** Finally, if the Commission wants to go further, BellSouth requests that the Commission view BellSouth's proposed changes to the CCP document Version 2.1 (now contained in the "working version") as the appropriate changes that should be made to the existing CCP process.

Issue 23: What should be the resolution of the following OSS issues currently pending in the change control process but not yet provided?

Q. IN HIS TESTIMONY ON PAGES 83-88, MR. BRADBURY CLAIMS THAT BELLSOUTH HAS YET TO PROVIDE AT&T WITH OSS FUNCTIONALITY TO SUPPORT THE QUALITY OF SERVICE ENJOYED BY BELLSOUTH'S RETAIL CUSTOMERS, SPECIFICALLY AS IT REGARDS: A) PARSED CUSTOMER SERVICE RECORDS; B) THE ABILITY TO SUBMIT ORDERS ELECTRONICALLY FOR ALL SERVICES AND ELEMENTS; AND, C) ELECTRONIC PROCESSING AFTER ELECTRONIC ORDERING, WITHOUT SUBSEQUENT MANUAL

PROCESSING BY BELLSOUTH PERSONNEL. HOW DO YOU PROPOSE TO RESPOND TO THESE CLAIMS FOR EACH SUB-PART?

A. Even though BellSouth continues to believe that this whole issue is inappropriate for this arbitration because it is being addressed within the CCP, I will address each of the sub-parts in the same order as Mr. Bradbury has.

Sub-Part A) Parsed Customer Service Records

Q. ON PAGES 84 AND 85 OF HIS TESTIMONY, MR. BRADBURY CLAIMS THAT BELLSOUTH SHOULD PROVIDE PARSED CUSTOMER SERVICE RECORDS FOR PRE-ORDERING PURSUANT TO INDUSTRY STANDARDS, AND THAT AT&T MUST RE-ENTER THE SAME DATA WHEN ORDERING, WHICH TAKES TIME AND COSTS EXTRA MONEY. DO YOU AGREE?

A. No, I do not. As I presented in great detail in my direct testimony on Pages 85-92, AT&T has the ability to parse customer service records ("CSRs") to the sub-line level that it wants by doing the parsing on its side of the interface. BellSouth provides the same data stream of CSR information to CLECs –via the machine-to-machine Telecommunications Access Gateway ("TAG") pre-ordering interface – which BellSouth provides to its retail units. As detailed in my direct testimony, TAG is based on the Common Object Request Broker Architecture ("CORBA")

industry standard. Further, as stated on Page 85 of my direct testimony, the FCC has contradicted AT&T's interpretation of the Bell Atlantic New York order by saying that “we have not previously stated that a BOC [“Bell Operating Company”] must perform parsing on its side of the interface.” (AT&T Texas I Dalton/DeYoung Decl. at Para. 95) If AT&T feels that it takes time and costs extra money for its service representatives to re-enter data, perhaps that time and money should be invested in developing the parsing capability on its side of the interface, as it is capable of doing.

With that said, and even though BellSouth's current position has been supported by the FCC, an AT&T change request (TAG0812990003) for parsed CSRs is currently being processed within the CCP, which is the appropriate avenue and process for such a request. Because AT&T is trying to use this arbitration proceeding to gain a Commission ruling (thereby circumventing the CCP), mention of this change request has been conveniently avoided by Mr. Bradbury.

However, as I mentioned in my direct testimony on Page 88-90 with supporting documentation as Exhibits RMP-31, 32 and 33, there is a CCP sub-team devoted to processing this change request, and there is a targeted implementation of the parsed CSR feature during summer 2001.

Sub-Part B) Electronic Ordering of All Services and Elements

Q. ON PAGES 85 & 86 OF HIS TESTIMONY, MR. BRADBURY CLAIMS THAT BELLSOUTH RETAIL UNITS CAN PLACE ELECTRONIC ORDERS FOR EVERY SERVICE AND PRODUCT THAT IT PROVIDES ITS CUSTOMERS. PLEASE COMMENT.

A. It is inappropriate to compare BellSouth's retail interfaces for submitting service requests for complex orders – which utilize a legacy system that is not compatible with the industry-standard LSR format – to that of a CLEC issuing a complex order via the LSR industry-standard format. The issue is one of translations of an LSR-formatted request to a format that can be accepted by BellSouth's Service Order Communications System ("SOCS") for provisioning by further downstream BellSouth OSS legacy systems. The interfaces utilized by BellSouth's retail units do not have to deal with this translations issue because the service requests are built in a SOCS-compatible format.

Mr. Bradbury's testimony also suggests that it is a simple matter for BellSouth to electronically input *any* order for a BellSouth retail customer, and that is not the case. While the ultimate electronic input for a BellSouth retail complex order may be the result of a "single employee" typing it, as he states on Page 88, requests for complex services are actually the result of a team of employees working to develop the information necessary for that "single employee" to input the service request. That team might include the account team, system designers, network specialists and other subject matter experts required for input of

information to the order. Once that team has done its collective work, and the BellSouth service representative has “gathered and arranged all of the information” (to quote Mr. Bradbury), it is then typically written on a paper service order form. It is from that form that a “single employee” inputs the order utilizing the Regional Ordering System (“ROS”) interface, for example, for a business transaction. ROS then transmits the SOCS-compatible formatted order and distributes it to the downstream provisioning systems.

For CLECs placing a complex services request, the process is substantially similar. It is still a team effort, but involves CLEC personnel along with BellSouth account team representatives, system designers or other BellSouth subject matter experts. Once the order information has been “gathered and arranged” by the CLEC, it is then handed off via the LSR process to BellSouth's Local Carrier Service Center (“LCSC”). This process requires the CLEC to fill out an LSR for the requested service. It is from this LSR that the BellSouth LCSC representative inputs the request to the Direct Order Entry (“DOE”) system. In other words, at that point, a “single employee” types the order into DOE, which in turn puts the information into a SOCS-compatible format, and distributes the order to the same downstream service order and provisioning systems as does the BellSouth retail order process. This process provides ordering for CLECs in substantially the same time and manner as does the process for BellSouth retail units.

Q. MR. BRADBURY ALSO CLAIMS ON PAGE 86 THAT BELLSOUTH HAS CONTINUALLY REFUSED TO PROVIDE FULLY ELECTRONIC ORDERING CAPABILITY TO CLECS, THUS REDUCING THE CLECS' ABILITY TO COMPETE. HOW DO YOU RESPOND?

A. AT&T has not issued a change request asking for the electronic submission of all Local Service Requests ("LSRs"), so it is unclear to BellSouth how AT&T can say that BellSouth has continually refused that capability. Because BellSouth adheres to the guidelines of the CCP, BellSouth doesn't recognize a request for change to its OSS unless the formal request comes through the CCP.

I would also like to reiterate my statement from my direct testimony that nondiscriminatory access does not require that all LSRs be submitted electronically, and that BellSouth's processes are in compliance with the Telecommunications Act and the FCC rulings in that regard. AT&T's contention that the competitive ability of CLECs is compromised because all LSRs cannot be submitted electronically is unfounded and unsubstantiated.

Q. CAN YOU HELP PUT THIS ISSUE IN PERSPECTIVE BY DISCUSSING THE PERCENTAGE OF ORDERS THAT ARE SUBMITTED ELECTRONICALLY BY CLECS AS OPPOSED TO MANUAL SUBMISSIONS?

A. Yes. As a point of reference, in October 1999, a total of 214,641 Local Service Requests ("LSRs") were processed by BellSouth. Of that total, 103,123 (48%) were submitted manually and 111,518 (52%) were submitted electronically. As of October 2000, one year later, LSR total submissions had grown by 84% to 393,795. However, in October 2000, only 12% (47,961 LSRs) were submitted manually and 88% (345,834 LSRs) were submitted electronically. The facts speak for themselves. The CLEC community as a whole has found the deployment of the electronic interfaces to be effective and the vast, vast majority of all orders are submitted electronically at this time. While everyone would like 100% of orders to be submitted electronically, because BellSouth's personnel have to be involved when an order is submitted manually, as well as the CLEC personnel, it is unreasonable to expect that every order will be electronically submitted anytime in the immediate future. Such a requirement would make no sense and should not be imposed on BellSouth.

Sub-Part C) Electronic Processing after Electronic Ordering without Subsequent Manual Processing by BellSouth Personnel

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON SUB-PART C?

A. As I understand this issue, AT&T is requesting that all complete and correct LSRs submitted electronically flow through BellSouth systems without manual intervention.

Q. WHAT IS BELLSOUTH'S POSITION ON SUB-PART C?

A. Nondiscriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without manual intervention.

Q. WHAT IS FLOW-THROUGH?

A. Flow-through for a CLEC LSR occurs when the complete and correct electronically-submitted LSR is sent via one of the CLEC ordering interfaces (EDI, TAG, RoboTAG, or LENS), flows through the mechanical edit checking and LESOG system, is mechanically transformed into a service order by LESOG, and is accepted by the Service Order Control System ("SOCS") without any human intervention.

Q. HAS ANY CLEC SUBMITTED A CHANGE REQUEST REGARDING THIS ISSUE TO THE CCP?

A. No. To BellSouth's knowledge, no such change request has been submitted to the CCP. As I have discussed previously, BellSouth's position is that OSS issues subject to the CCP are not appropriate for this

arbitration. AT&T is attempting to avoid the CCP. All requests for enhancements to BellSouth's electronic and manual interfaces should be submitted via the CCP.

Q. IS IT FEASIBLE FOR LSRS FOR ALL COMPLEX SERVICES TO BE SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE BELLSOUTH SYSTEMS?

A. No. As I discussed in sub-part (B), many of BellSouth's retail services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. The orders at issue here are those that the CLEC may submit electronically, but fall out by design. In most cases these orders are complex orders. For certain orders, BellSouth has, for the ease of the CLEC, allowed them to be submitted electronically even though BellSouth then manually processes such orders. The specialized and complicated nature of complex services, together with their relatively low volume of orders as compared to basic exchange services, renders them less suitable for mechanization, whether for retail or resale applications. Complex, variable processes are difficult to mechanize, and BellSouth has concluded that mechanizing many lower-volume complex retail services would be imprudent for its own retail operations, in that the benefits of mechanization would not justify the cost. Because the same manual processes are in place for both CLEC and BellSouth retail orders, the

processes are competitively neutral, which is exactly what both the Act and the FCC require.

Q. DO COMPLEX ORDERS PROCESSED ON BEHALF OF BELLSOUTH REQUIRE MANUAL INTERVENTION?

A. Yes. As previously described herein and in my direct testimony, in the case of service requests for complex services by CLEC or BellSouth end users, there are systems designers and consultants involved in the work flow between the CLEC or BellSouth representative who take the service request and the person who inputs the service order into the system. These designers and consultants clarify and expand on the information from the end user customer as necessary to prepare the order for input. Therefore, complex orders, even those that can be submitted electronically, do not flow through because there is significant manual intervention – the amount of which varies from order to order – between the time order information is taken by the CLEC or BellSouth representative and before the order is input.

Q. ARE THERE OTHER REASONS FOR ORDERS TO FALLOUT BY DESIGN THAN BEING A COMPLEX SERVICE?

A. Yes. There are appropriate categories other than complex services for an LSR to fallout by design for manual handling. All of these categories have been identified in the Service Quality Measurements Performance Reports

document for the Percent Flow-Through Service Requests (Summary). The document can be found at the password protected BellSouth Performance Measurements Report website (https://pmap.bellsouth.com/clec_specific_reports.cfm). One situation in which it makes sense for LSRs to fall out by design is the result of the decision not to program the Local Exchange Service Order Generator ("LESOG") to handle a certain capability in advance of standards – e.g., partial migrations for other than conversion-as-is – or for products and services for which CLECs order very low volumes. In cases of special pricing plans that are unique to each CLEC, no automatic service order generation is possible for such orders. Another example is when a CLEC (or BellSouth) submits a service request before the new telephone number for the end user has been posted to the billing system; in those situations the request will appropriately fall out for manual handling.

Q. ON PAGES 92-105 MR. BRADBURY DISCUSSES THE ALLEGED IMPACT OF DESIGNED MANUAL FALL OUT AND BELLSOUTH-CAUSED SYSTEM FAILURES. DO YOU AGREE WITH HIS ASSESSMENT?

A. No. This is the part of his testimony where Mr. Bradbury purports to use numbers and figures to show the problems he asserts are raised by this issue. Unfortunately, Mr. Bradbury has presented an elaborate, but inconclusive approach utilizing regional flow-through data and it has led him to the wrong conclusion. To better understand BellSouth's

performance one must “peel the onion” back and look at detail into the numbers and actual LSRs submitted. Mr. Bradbury’s process does not do so. In all fairness, I have to say that in order to be thorough, which Mr. Bradbury was not, one has to look at the actual data underlying the results that are reported. Mr. Bradbury obviously does not have access to this data and it is appropriate that he does not since it involves information germane to other CLECs. Nevertheless, his conclusions based on incomplete data are wrong and misleading and that is why he should speak only to AT&T’s experiences and supporting data if he wants to make comments in this area.

Q. DO YOU AGREE WITH MR. BRADBURY’S PRESENTATION OF THE DATA IN HIS ANALYSIS?

A. No. Mr. Bradbury has intentionally misrepresented the data for the month of October 2000 to more favorably reflect his point of view in what is already a faulty analysis process. Specifically, Mr. Bradbury has taken the data reflected in the report column for “Pending Supps” and added this to the data reflected in the report column for “Total Manual Fallout” and used this sum as the amount for Total Manual Fallout. Attached, as Exhibit RMP-38, is the PERCENT FLOW-THROUGH SERVICE REQUESTS report for October 2000. This is commonly referred to as the ‘flow-through’ report and is made available publicly via BellSouth’s performance measures website. Please refer to page 20 of this report. On this page you will note the summary information which as noted at the top of the

page is for the 'BUSINESS DETAIL'. Now please compare this to Exhibit JMB-33 filed in Mr. Bradbury's direct testimony. On page 3 of Mr. Bradbury's exhibit, the last 3 columns represents a snapshot of some of the summary data from page 20 of the flow-through report. A comparison of the data is noted below.

Manual Fall-Out

	Exhibit JMB-33	Flow-through Report
LENS	2,676	2,440
TAG	500	483
EDI	1,083	969

The difference in the amounts can be found in the 'Pending Supps' column of the flow-through report. That column reflects the following:

	Pending Supps
LENS	236
TAG	17
EDI	114

Q. WHAT ARE 'PENDING SUPPS'?

A. Pending Supps is short for Pending Supplements. A Pending Supplement is the result of a LSR that has been submitted by a CLEC being changed (supplemented) by the CLEC prior to acceptance by BellSouth. It results in the initially submitted LSR going into a pending status as the mechanical systems have recognized the subsequent LSR submittal. The LSR in the pending status will eventually be mechanically deleted by the system. These deleted LSRs are being categorized for purposes of flow-through as Pending Supps.

Q. HAS BELLSOUTH ALWAYS HAD THE CATEGORY 'PENDING SUPPS' ON THE FLOW-THROUGH REPORT?

A. No. This was a new category added with the September 2000 report.

Q. WHAT PROMPTED THIS CHANGE TO THE REPORT?

A. This is the result of an exception as part of the Third Party Testing being conducted in Georgia. KPMG[1] identified this as an exception during their reconciliation of the flow-through report. Initially these pending LSRs were being identified as a CLEC error. As a result of the KPMG Third Party Testing exception, BellSouth re-categorized these LSRs as a BellSouth caused error. However, KPMG did not agree with that categorization as it was felt these LSRs were not an error on the part of the CLEC or

[1] KPMG Consulting, LLC provides oversight of Third Party ordered by the Georgia Public Service Commission to determine whether BellSouth's provision of access to OSS functionality enables and supports CLEC entry into the local market.

BellSouth. Instead, these LSRs are just a part of the process. So a new category (Pending Supps) was created to properly categorize the LSRs.

Q. SO THESE 'PENDING SUPPS' LSRS HAVE NEVER BEEN COUNTED AS PART OF 'TOTAL MANUAL FALLOUT' FOR FLOW-THROUGH?

A. That is correct. As I just described, these LSRS at one time were CLEC errors and then were re-categorized as BellSouth errors, but they have never been categorized as 'Manual Fallout'.

Q. WAS THIS CHANGE TO THE FLOW-THROUGH REPORT COMMUNICATED TO THE CLECS?

A. Yes. As previously stated, the monthly flow-through report is made available publicly to the CLECs via BellSouth's performance measures website. With the posting of this report in September, a notice of this change was also posted to the performance measures website.

Q. ARE THERE OTHER ISSUES WITH MR. BRADBURY'S ANALYSIS OF THE FLOW-THROUGH REPORT DATA?

A. Yes. Using October 2000 as an example, there were 325,034 LSRs [2] submitted electronically to BellSouth. To understand this data and the

[2] PERCENT FLOW-THROUGH SERVICE REQUESTS (DETAIL), October 2000 report at page 9, total reflected for "TOTAL INTERFACES" row in "Total Mech LSRs" column, Exhibit RMP-38.

impact it has on flow-through, one must have a thorough understanding of the individual CLEC data comprising the total.

Q. CAN YOU ILLUSTRATE WHY LOOKING AT INDIVIDUAL CLEC DATA IS NECESSARY FOR A THOROUGH ANALYSIS AND UNDERSTANDING OF MR. BRADBURY'S EXAMPLE?

A. Yes. For sake of illustration let us use the PERCENT FLOW-THROUGH SERVICE REQUESTS (BUSINESS DETAIL) report for October 2000. The specific report used for this discussion is attached as Exhibit RMP-38. Pages 16-20 are the pages specific to the business flow-through report.

By conducting a detailed review of the report, one can identify 145 users[3] of the LENS electronic interface based on the number of individual horizontal lines of data presented. There are also 5 users of the EDI interface and 18 users of the TAG interface. From further review it can be determined that there were 7 users of LENS that submitted 500 or more LSRs. I will refer to these as the seven dominant users of LENS. For EDI there is only one dominant LSR volume user of EDI and for TAG there are two dominant LSR volume users. For LENS the seven dominant users submitted 5,412 LSRs. That accounted for 40% of the total business resale LSRs submitted and 50% of the volume for the LENS interface alone. For EDI the one user submitted 1,623 LSRs. That accounted for

[3] I have used the term 'user' instead of 'CLEC' when making reference to a horizontal line of data represented on the flow-through report. This is because each line of data represents an Operating Company Number ("OCN") and some CLECs have multiple OCNs. Thus, on the flow-through report two or more users may represent a CLEC's total data.

12% of the total business resale LSRs submitted and 99% of the volume for the EDI interface. For TAG, the dominant users submitted 777 LSRs. That accounted for 6% of the total resale business LSRs submitted and 66% of the volume for the TAG interface. The combination of these ten users represents 57% of the overall business resale LSR volume submitted via the electronic interfaces. This is over one-half of the electronic LSR business resale submissions.

The data presented above is summarized in the following table.

	Total LSRs Electronically Submitted	Total Number of Users	Number of Dominant Users	LSRs Submitted by Dominant Users	Percent of LSRs by Electronic Interface	Percent of Total LSRs Electronically Submitted
LENS	10,826	145	7	5,412	50%	40%
EDI	1,644	5	1	1,623	99%	12%
TAG	1,180	18	2	777	66%	6%
Total	13,650	168	10	7,812	N/A	57%

Q. WHAT IS THE SIGNIFICANCE OF TEN USERS COMBINING FOR OVER ONE-HALF OF THE LSR BUSINESS RESALE VOLUME?

A. Obviously when such a large percentage of the volume comes from such a small number of the users, then the overall results for that area will be skewed by the performance of those few users. That is specifically the case for this situation.

Q. ARE THERE OTHER DATA WITH RESPECT TO THESE USERS THAT HAVE IMPACT ON THE OVERALL RESULTS?

A. Yes. These same ten users combine for 2,619 LSRs that fall out by design for manual processing. That represents 67% of the total manual fall out. For their respective electronic interfaces, the seven users of LENS account for 53% of the manual fall out for the LENS interface, the user of EDI accounts for 99% of the manual fall out for the EDI interface, and the two users of TAG account for 73% of the manual fall out for the TAG interface.

Q. IS THERE A SPECIFIC REASON THESE CERTAIN USERS ARE EXPERIENCING SUCH A HIGH MANUAL FALL OUT?

A. Yes. Once again the data is private and proprietary, but this fact goes to demonstrate how incomplete knowledge can lead to incorrect conclusions. Without identifying the users or providing any identifying or proprietary information, I can state that the majority of the manual fall out for two of the ten dominant users is the result of one particular service which they resell to their end users. I know this as I personally reviewed their situation for this analysis.

Q. HAS BELLSOUTH DONE ANYTHING TO THE FUNCTIONALITY OF THE ELECTRONIC INTERFACES SPECIFIC TO THE SERVICE IN QUESTION?

A. Yes. With the January 14, 2000 implementation of Release 6.0 of EDI and Releases 3.0 and 3.1 of TAG (available for System Readiness Testing on December 18, 1999), functionality was made available for this particular service to flow through BellSouth's systems. In other words, the service in question no longer falls out by design for manual handling.

Q. SINCE THESE RELEASES WERE IMPLEMENTED IN JANUARY 2000, WHY ARE THESE USERS STILL EXPERIENCING SUCH A RATE OF MANUAL FALL OUT?

A. This result is because these users have yet to implement these releases. The timing of release implementation is controlled by the CLEC based on its individual business needs and decisions. Obviously anyone reviewing the public data would not know this and therefore could draw the wrong conclusions from the public data, as Mr. Bradbury did. This points, of course, to the need to be careful what conclusions you draw from incomplete information.

Q. WOULD THERE BE ANY DIFFERENCE IN THE RESULTS BASED ON MR. BRADBURY'S PROCESS HAD THESE USERS IMPLEMENTED THE RELEASES?

A. Yes. The results would reflect a difference. To illustrate I have used a conservative figure of 50% of the manual fallout reflected in the flow-

through just for these two users being able to flow through the systems. This is based on the assumption that these users implemented the Release 6.0 of EDI and Releases 3.0 and 3.1 of TAG. It also applies the assumption just as Mr. Bradbury did in his assessment that the users submitted service requests with absolutely no input errors. The results for the business resale for the EDI and TAG interfaces would change as noted below. Note that I have changed the AT&T results for 'Manual Fall Out' to properly represent the numbers by subtracting the 'Pending Supps' LSRs for the reasons described earlier in my testimony.

	Assessment by AT&T		Assessment by BellSouth	
	TAG	EDI	TAG	EDI
Total Mech LSRs	1180	1644	1180	1644
Manual Fall Out	483	969	337	488
Validated LSRs	445	447	592	928
BellSouth Caused System Failure	128	113	128	113
Flow-through Issued SOs	257	250	404	731
% Manual Fallout – LSRs	41%	59%	29%	30%
% BellSouth System Failure – LSRs	11%	7%	11%	7%
% BellSouth System Failure – VLSRs	29%	25%	22%	12%
% Total BellSouth Fallout + Failure – LSRs	52%	66%	39%	37%
% Maximum One-Touch CLEC Orders	47%	27%	59%	57%

Once again, this chart is for illustrative purposes only to show the impact of a failure to properly analyze the relevant data. As I stated above, this chart represents the impact of LSRs submitted by only two CLECs. This chart is in no way indicative of the actual October 2000 flow-through results.

Q. WHAT IMPACT WOULD THE ABOVE ILLUSTRATION HAVE ON THE BUSINESS RESALE FLOW-THROUGH RESULTS AS REPORTED BY BELLSOUTH FOR OCTOBER 2000?

A. For EDI business resale the results would have improved to 86.6% from the currently reported result of 68.9%. For TAG the result would have improved to 75.9% from the currently reported 66.8%.

Q. ARE THERE OTHER DATA THAT INFLUENCES THE FLOW-THROUGH RESULTS THAT MR. BRADBURY DID NOT CONSIDER FOR HIS ANALYSIS?

A. Yes. The above reflects the impact on only one area – business resale flow-through. Even for this one area in my analysis, I gave no consideration to the few CLECs that dominate the LSR volume submitted via the LENS interface. As previously stated, there are seven (7) users of the LENS interface that contribute to 40% of the total LSR submissions for business resale and another 34% of the total manual fallout. These seven

users represent 50% of the LENS business resale volume and 53% of the LENS manual fallout. One can combine these seven with the one dominant user of EDI and the two dominant users of TAG discussed earlier and easily conclude that 10 of 168 users (6% of the users) of electronic interfaces drive the flow-through results. Once again, these 10 combined for business resale LSRs that accounted for over one half (57%) of the volume submitted during the month of October 2000. If further analysis of these seven LENS users and the other two users of TAG were conducted, it would obviously impact the results further from what I have previously presented. Similar correlation can be made to the UNE and LNP flow-through reports, as there were sixty-four (64) users of the electronic interfaces for UNE LSRs and twenty (20) for LNP in October 2000. One user accounted for 80% of the UNE LSR submissions and two users accounted for 66% of the LNP LSR submissions.

Q. PLEASE SUMMARIZE CONCLUSIONS FROM YOUR ASSESSMENT.

A. A small number of CLECs are the dominant volume users of the electronic interfaces. Therefore, the flow-through results of these few CLECs skews the overall results. If these CLECs do not implement the latest software in which BellSouth has implemented the CLEC requested features, the overall results will not properly represent the current state of functionality capabilities existing for the electronic interfaces. That is the situation that exists today.

Q. WHAT EFFORTS ARE UNDERWAY WITHIN BELLSOUTH TO IMPROVE FLOW-THROUGH PERFORMANCE?

A. BellSouth is currently forming a joint BellSouth/CLEC Flow-through Improvement Task Force as directed by the Georgia Public Service Commission in its recent performance measurements order [GPSC Docket No. 7892-U, January 12, 2001]. The purpose of this task force is to identify and implement enhancements that will improve the flow-through performance of electronically submitted LSRs. It is BellSouth's proposal to handle this task force under the CCP, and a notification regarding the formation of the task force was sent to all registered CCP members on February 15, 2001. That notice is provided as Exhibit RMP-39.

Q. ON PAGES 103 AND 104 OF HIS TESTIMONY, MR. BRADBURY IMPLIES THAT THE DURATION OF THE TIME BETWEEN LSR FALLOUT AND THE TIME THAT AN LCSC REPRESENTATIVE 'CLAIMS' THAT LSR TO HANDLE IT IS UNREASONABLE. PLEASE COMMENT.

A. While the issue being raised by Mr. Bradbury deals more with performance metrics, I will nonetheless offer several responses to his claim. BellSouth has been addressing this issue for a number of months in anticipation of the aforementioned Georgia Public Service Commission order related to performance metrics – specifically those for reject interval for partially mechanized and non-mechanized LSRs, and for Firm Order

Confirmation ("FOC") timelines for partially mechanized and non-mechanized LSRs. The order puts the target metrics for these categories as follows:

Partially Mechanized Rejects and FOC Intervals

85% within 18 hours within 3 months of order

85% within 10 hours within 6 months of order

Non-Mechanized Rejects

85% within 24 hours (Effective with the Order filing date)

Non-Mechanized FOC

85% within 36 hours (Effective with the Order filing date)

BellSouth has responded previously to this issue in a similar AT&T arbitration proceeding filed before the Florida Public Service Commission [FPSC Docket No. 000731-TP], and as a result of a FPSC Staff interrogatory, provided as Exhibit RMP-40. To summarize that response, BellSouth has trained and added new employees in both the Atlanta and Birmingham Local Carrier Service Centers ("LCSCs"), and has opened a third center in Jacksonville to improve overall operational processing performance.

Our efforts are already reaping rewards, as pointed out to AT&T in our response to its letter requesting a root cause analysis on the FOC timelines for partially mechanized and non-mechanized LSRs. The AT&T request letter and our response are provided together as Exhibit RMP-41. Our response indicated that, while BellSouth did not meet benchmark

FOC intervals of 85% returned FOC within 48 hours during most of 2000 for the two categories, the current trend shows a positive improvement in both categories. In fact, the December 2000 results show a 95% performance less than 48 hours for partially mechanized LSRs, and 98% performance less than 48 hours for non-mechanized LSRs.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 23.

A. I will summarize Issue 23 as follows:

1) Issue 23 is not appropriate for this arbitration.

2) A Change Request is pending in the CCP for a subparsed CSR. This is an active element before the CCP and will be resolved there.

3) Nondiscriminatory access does not require that all LSRs be submitted electronically. Some of BellSouth's services, primarily complex services, require involve manual handling.

4) BellSouth is providing nondiscriminatory access for CLECs to its OSS functions. Nondiscriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without manual intervention.

Issue 24: Should BellSouth provide AT&T with the ability to access, via EBI/ECTA, the full functionality available to BellSouth from TAFI and WFA?

Q. ON PAGE 107, MR. BRADBURY STATED THAT “FOR MANY (BUT NOT ALL) SERVICES ASSOCIATED WITH A TELEPHONE NUMBER, BELLSOUTH OFFERS ACCESS TO ITS PROPRIETARY TROUBLE ANALYSIS FACILITATION INTERFACE (TAFI)”. DO YOU AGREE?

A. No. The CLEC can use TAFI to enter a trouble report for ALL telephone number- (TN) based services. The objective of TAFI is to ‘screen’ (test, analyze, repair or route) each trouble report before entering the report into the LMOS. As pointed out in Section 3.2 (Limitations) of the CLEC-TAFI User Guide (Issue 5), there are a few TN-based services that TAFI does not screen. However, the user can still enter the report and manually route it to a Maintenance Administrator for screening. This functionality is exactly the same for the version of TAFI used by BellSouth’s retail units. (Note: Section 3.2.1 of the Guide indicates that stand-alone UNE ports are not supported in TAFI. This item is now inventoried in LMOS and supported by TAFI, and the next issue of the Guide will remove this statement.)

Q. ON PAGE 108, MR. BRADBURY PRESENTS HIS ARGUMENT THAT NEITHER TAFI NOR ECTA PROVIDES NONDISCRIMINATORY ACCESS TO BELLSOUTH’S OSS FOR MAINTENANCE AND REPAIR. DO YOU AGREE WITH HIS ASSESSMENT?

A. No. The Telecommunications Act requires ILECs to provide CLECs with the ability to enter trouble reports into the ILECs' OSS in substantially the same time and manner as is enjoyed by the ILECs' personnel entering trouble reports into the OSS. Thus, 'same time' equates to response time, and 'same manner' equates to access to the same functionality. The response time and functionality of CLEC-TAFI is the same as the version of TAFI used by BellSouth's retail units. (Actually the CLEC-TAFI functionality is superior to BellSouth's TAFI since it can process both Residence and Business trouble reports on the same processor.) Therefore, CLEC-TAFI provides nondiscriminatory access to BellSouth's OSSs.

BellSouth also supports interfaces built to National standards and for Maintenance and Repair functions, this interface is ECTA. The functionality of ECTA is limited by the national standards to providing the CLEC the ability to: (1) enter a trouble report; (2) modify an existing trouble report; (3) close an existing trouble report; (4) obtain trouble report status information; and, (5) obtain mechanized loop test ("MLT") data on a line without entering a trouble report. BellSouth does not use ECTA internally to submit trouble reports to its OSSs so there is not an analogous BellSouth retail process for comparison of the response time and functionality. However, the response time and functionality of ECTA are clearly defined in the ECTA Joint Implementation Agreement (JIA) which is agreed to by each CLEC using ECTA. (AT&T agreed to and signed an ECTA JIA in 1997.) The current "boiler plate" JIA is available

on the web at

http://www.interconnection.bellsouth.com/guides/clec_ar.html.

Mr. Bradbury contends that "when a CLEC submits a trouble report via TAFI, that order must be manually entered into the CLEC's own internal OSS". Please note that the Telecommunications Act does not require the CLEC to enter a report into its own OSS. It only addresses the ILECs' responsibility of providing nondiscriminatory access to its OSS. Therefore, performing "costly and error-prone double entry" (for trouble reports) is a business decision of the CLEC and is not a requirement of the Telecommunications Act. Hence, this does not impact the definition of nondiscriminatory access.

Q. IN YOUR PREVIOUS ANSWER, YOU INDICATED THAT ECTA IS BUILT TO NATIONAL STANDARDS. WHO DEFINES THESE NATIONAL STANDARDS TO INSURE THAT THE NEEDS OF THE CLECS ARE ADDRESSED?

A. ECTA is built to the American National Standards Institute's (ANSI) standards. The Electronic Communications Implementation Committee (ECIC) developed these standards. The ECIC is a subcommittee of the Telecommunications Industry Forum ("TCIF"), which was established to foster the implementation of electronic communications, particularly with regard to trouble administration. AT&T and BellSouth (along with most ILECs and interested CLECs) have active participation in ECIC activities

including the establishment of new standards. Therefore, through ECIC, CLECs have the ability to define ECTA functionality.

Q. ON PAGE 108, MR. BRADBURY INDICATED THAT "CLEC'S CANNOT INTEGRATE TAFI WITH THEIR OWN 'BACK OFFICE' SYSTEMS AS BELLSOUTH DOES". IS HE CORRECT?

A. No. TAFI cannot be integrated for either user community. TAFI is a front-end human-to-machine user interface that obtains data from various OSSs in order to test, analyze, repair or route a given trouble report. BellSouth's OSSs are <u>not dependent upon TAFI</u> for their operation. If TAFI were pulled from the infrastructure, the remaining systems (i.e., LMOS, CRIS, Predictor, MARCH) would work fine. Therefore, TAFI is not integrated with these systems – it only accesses these systems.

Once the proper determination is made, TAFI enters the trouble report into LMOS for subsequent processing. (If the trouble condition was resolved, TAFI would enter, and then close, the LMOS report.) This is true regardless of the party that generated the trouble report – the CLEC or BellSouth. Although LMOS is BellSouth's maintenance OSS, CLECs using TAFI have the ability to view LMOS trouble status and LMOS trouble history data for specific end-users just like BellSouth users can. The argument for double-entry was addressed earlier and remains moot.

The statement made by BellSouth in the Louisiana 271 application before the FCC was misinterpreted by AT&T. The statement "BellSouth concedes that it derives superior integration capabilities from TAFI" means that TAFI obtains data from various OSSs for a given trouble condition and then mechanically integrates this information to form the analysis determining the correct course of action to effect a repair. TAFI's capability of "automatically interacting with other systems as appropriate" is correct for both CLEC-TAFI and the version of TAFI used by BellSouth's retail units. This statement just means that TAFI obtains data from the appropriate OSSs for a given trouble condition. For example, if the customer were reporting no dial tone, TAFI would execute an MLT to check the line. For this report, TAFI would not verify features programmed in the central office switch. On the other hand, if the customer indicated that their Call Waiting feature didn't work, TAFI would not execute an MLT.

Q. ON PAGE 109, MR. BRADBURY PROVIDES HIS ARGUMENTS FOR A 'FULL FUNCTION MACHINE-TO-MACHINE MAINTENANCE AND REPAIR INTERFACE'. WHAT COMMENTS DO YOU HAVE?

A. Mr. Bradbury says, "if a CLEC wants to issue credits to a customer who had experienced recurring repairs, it would need access to billing data and repair histories." BellSouth's OSSs only track what items were sold to the CLECs and not what the CLEC sold to their end user and for what price. Therefore, the CLEC must rely on its own billing system. Trouble history data has been available via TAFI since its introduction. (Note: ECIC is

currently evaluating a methodology for obtaining Trouble History data over ECTA. Once the standard is approved, BellSouth will deploy it if requested to do so by those CLECs using the interface.)

Mr. Bradbury further states on Page 110 that "CLECs must be able to add or change service and adjust calling plans for customers, and require access to customer service record information to keep contact information up-to-date." Adding or changing service is the result of provisioning initiated by the submission of a service request, which is part of the ordering process. Accessing customer service record data is available via the pre-ordering process. Both pre-ordering and ordering functions are mechanically available via the machine-to-machine electronic interface called Telecommunications Access Gateway ("TAG").

Using Mr. Bradbury's numbers from Page 110, 30 months after market entry (and using a 6%-per-month trouble rate), 60,000 repair calls per month indicates an installed base of 1,000,000 lines for AT&T in BellSouth's area. As information, BellSouth's retail units process between 1.5 and 2.0 *million* TAFI reports per month with no problems.

To avoid the 'double-entry' problem to which Mr. Bradbury keeps referring, AT&T could re-establish their use of ECTA and enjoy the functionality provided by the National Standards. As information, AT&T was the first CLEC to build an interface to BellSouth's ECTA system. That interface

went into production on March 18, 1998. On April 9, 1998 (three weeks later), AT&T suspended the service.

Q. ON PAGE 111, MR. BRADBURY RECOUNTS AT&T'S NUMEROUS REQUESTS FOR BELLSOUTH TO PROVIDE FULL TAFI FUNCTIONALITY OVER THE ECTA INTERFACE. PLEASE PROVIDE YOUR COMMENTS ON THIS TOPIC.

A. AT&T requested that BellSouth provide full TAFI functionality via the ECTA interface on numerous occasions. BellSouth agrees that providing enhanced functionality via a machine-to-machine interface would be attractive to the CLEC community. However, ECTA is <u>not</u> the vehicle to deliver this functionality since it adheres to the National standards for exchanging maintenance and repair information – and these standards do not support all of the data elements required (A 'data element' is defined as a specific field of information in a data transmission. For example, ANSI standard 262 defines the methodology for obtaining results of a mechanized loop test, and the corresponding string of data bits containing those results is the MLT data element.). In addition, the standards do not provide a vehicle for BellSouth to deliver the interactive dialogue and analysis rules required for TAFI functionality.

On Page 112, Mr. Bradbury misrepresents issues regarding the Georgia PSC Order, Docket No. 6352U (July 2, 1996). At line 6, he says, "BellSouth stated that it 'has investigated the possibility of adding to the

existing [EBI] gateway a system called TAFI'". What BellSouth actually said was that it had investigated the possibility of adding its internally developed and proprietary system called TAFI to the list of interfaces available to CLECs to report their end-user trouble reports. At that time, BellSouth did not have the ECTA maintenance and repair interfaces available for CLECs. However, special development work would have to be done to TAFI (i.e., ensuring that a given CLEC could only access records pertaining to their customers, etc.) before it could be made available to the CLEC community. Beginning at line 9, he further states that the "Georgia PSC ordered BellSouth to complete 'the TAFI enhancements to allow full operation of the required access by March 31, 1967'". While BellSouth thinks Mr. Bradbury meant 19***9***7, this order was to make TAFI available to CLECs and **not** to put TAFI functionality into ECTA. BellSouth satisfied this Georgia PSC order on March 28, 1997 when the first CLEC generated a trouble report via CLEC-TAFI.

On page 113, Mr. Bradbury refers to a comment made by BellSouth's Mr. William Stacy where Mr. Stacy stated that "BellSouth could provide initial functionality in 13 months and complete functionality in 18 months". What Mr. Stacy was referring to was a non-standard arrangement to develop and deliver 'TAFI-like' functionality over a machine-to-machine interface – **not** that BellSouth could provide this functionality over the existing ECTA interface. If AT&T wanted to pursue such an interface, then AT&T would have to submit a BonaFide Request ("BFR"). Nearly two years after Mr. Stacy's comment, AT&T has not submitted a BFR (for which it would have

to pay, by the way) and, therefore, BellSouth has not pursued its development.

Also on page 113, Mr. Bradbury states that “AT&T submitted a formal change request through the Interim Change Control Process on April 18, 2000, asking for TAFI functionality via the ECTA interface”. BellSouth replied to this request on June 29, 2000 (Provided as Exhibit RMP-42) and explained in detail why it was not possible to implement this request.

Q. ON PAGE 114, MR. BRADBURY IMPLIES THAT PROVIDING ADDITIONAL FUNCTIONALITY OVER THE ECTA INTERFACE DOES NOT VIOLATE THE NATIONAL STANDARDS. WOULD YOU PLEASE PROVIDE BELLSOUTH’S INTERPRETATION OF THAT POSITION?

A. BellSouth has always supported national standards for the exchange of information with the CLEC community. For maintenance and repair functions, large CLECs (those dealing with multiple ILECs) benefit by using a machine-to-machine system built to these standards because their one interface will properly interact with the multiple ILEC systems – assuming the other ILECs also support these national standards.

BellSouth agrees that providing system functionality over and above the national standards does not by itself violate the standards. However, by doing so would change the scope of ECTA, and ECTA would no longer be

compliant to these national standards – in fact, it would become a "non-standard" interface.

According to the AT&T/BellSouth Georgia Interconnection Agreement Attachment 15, Section 6.2 BellSouth was contractually obligated to *"…for the purpose of exchanging fault management information, establish an electronic bonding interface, based upon ANSI standards T1.227-1995 and T1.228-1995, and Electronic Communication Implementation Committee (ECIC) Trouble Report Format Definition (TRFD) Number 1 as defined in ECIC document ECIC/TRA/95-003, and all standards referenced within those documents."* This ECTA development effort fell under the scope of the Georgia PSC order (Docket No. 6352-U) which ordered both AT&T and BellSouth establish a Joint Implementation Team (JIT) to assure effective implementation of the electronic interfaces. BellSouth was required to provide the GA PSC with monthly status reports of its progress. Section 4 of the May 15, 1998 Monthly Surveillance Report shows that BellSouth and AT&T completed the development of ECTA and the system was placed into production on March 18, 1998. It also shows that AT&T elected to suspend its use of ECTA on April 9, 1998 and they have not resumed to date.

Both parties agreed to the ECTA functionality as documented in the "Joint Implementation Agreement (JIA) for Electronic Bonding (Maintenance) Gateway for Local Service between AT&T and BellSouth" dated September 25, 1997. As stated in Section 1.1 of the JIA, AT&T's

requirements for a Trouble Administration interface, as defined in the AT&T document "Fault Management - Electric Bonding Interface for Local Service" (March 7, 1997), were accommodated.

The AT&T/BellSouth Interconnection agreement further states that *"Where a function is not presently supported for a given Network Element, the Parties agree to work collaboratively* *<u>within the industry</u>* *for its inclusion in* *<u>future releases of the standards</u>."* In other words, if "additional functionality" is needed, the party wanting this functionality would work 'within the industry' (ECIC) to develop enhancements to the existing standards (or generate a new standard) to achieve the desired result. Once the new standard is developed, BellSouth would implement it in its ECTA interface. (Note: A number of CLECs wanted the ability to obtain a mechanized loop test on a given line without generating a trouble report. BellSouth took the lead at ECIC and – working 'within the industry' – helped to develop ANSI standard T1.262-1998. This new functionality is now deployed in BellSouth's ECTA interface.)

Q. STARTING ON PAGE 115, MR. BRADBURY PROVIDES HIS COMMENTS REGARDING AN INFORMAL PRESENTATION MADE BY BELLSOUTH AT THE OCTOBER 25, 2000 CHANGE CONTROL STATUS MEETING. PLEASE PROVIDE YOUR COMMENTS.

A. Mr. Piatkowski (BellSouth) used this forum to share the status of several development initiatives that *may* someday have an impact on the CLEC

community. The intent was to provide the audience with a preview of what *may* become available. As stated by Mr. Bradbury, Mr. Piatkowski discussed three systems: DLEC-TAFI, CPSS-TA and E-Repair. Mr. Piatkowski was very deliberate in his presentation to state that BellSouth was developing CPSS-TA and E-Repair for the non-CLEC user communities and that these systems *may* be extended to support the CLEC community in the future. DLEC-TAFI was specifically developed for the Data Local Exchange Carrier (DLEC) community that uses the line-sharing technique for delivering access to high-speed data transmission.

Mr. Bradbury's comments on lines 11 through 16 on page 115 are incorrect. DLEC-TAFI is not a unique system. It is an enhancement to the CLEC-TAFI system. By definition, a DLEC is a type of CLEC that provides high-speed data through the line-sharing methodology. This CLEC-TAFI enhancement **does not** support BellSouth's retail ADSL product line **nor** does it support CLEC xDSL trouble reports. There has **never been** a retail version "available to BellSouth for some time but is only now being demonstrated to C/DLECs." This CLEC-TAFI enhancement was developed at the request of the DLEC Collaborative - a group of DLECs working with BellSouth on line-sharing.

Mr. Bradbury's comments regarding CPSS-TA (the Circuit Provisioning Status System – Trouble Administration) on page 115 are correct. The interexchange carrier user pilot was successful and BellSouth has

targeted an offering for CPSS-TA to the CLEC community during the first quarter of 2001.

The future evolution of E-Repair is unknown at this time. Mr. Piatkowski indicated that the initial version of this system – built for BellSouth's large retail customers – would only provide a view of trouble-report status information (from both LMOS and WFA) via the Internet. The pilot for this initial system, using several select retail customers, began in January 2001. The results of this trial will determine its future. Assuming that the trial is successful and E-Repair becomes a viable product, CLECs would have access.

The E-Repair developers are looking at the possibly of expanding the functionality of the system to include trouble entry. If this effort is approved (and funded), it would be a "Phase-II" initiative. Since E-Repair accesses both LMOS and WFA, and **if** BellSouth expanded its functionality to include trouble entry, then it would be logical to migrate CLEC-TAFI and CPSS-TA users to a single system. However, there are no firm plans for E-Repair beyond the initial pilot.

Q. ON PAGE 117, MR. BRADBURY EXPRESSES SOME CONCERN OVER THE PROCESS USED TO DEVELOP DLEC TAFI, CPSS-TA AND E-REPAIR. WHAT COMMENTS DO YOU HAVE?

A. As Mr. Piatkowski pointed out, the CPSS-TA and E-Repair initiatives were developed for non-CLEC user communities and, therefore, the development of those systems are not subject to the (CLEC) Change Control Process. When – and if – these systems are made available to CLECs, CLECs will certainly have the ability to submit suggestions for the system's evolution.

The DLEC enhancements to TAFI were developed at the request of DLECs participating in the DLEC Collaborative meetings at BellSouth. The DLEC Collaborative is an ad hoc subcommittee of the CCP. The participating DLECs are also members of the CCP, and had no issue with this development taking place within the DLEC Collaborative. In fact, Mr. Piatkowski's presentation to the CCP was in keeping with BellSouth's intent to keep the CCP informed of developments in the DLEC Collaborative project.

I must take exception to Mr. Bradbury's comment at line 2 on page 117 – "As I explained above, AT&T has a long-standing request for a full-function maintenance and repair interface, and has been negotiating in good faith with BellSouth regarding this issue for over a year, yet BellSouth failed to raise these projects as a possible solution." AT&T has been requesting that BellSouth provide "TAFI Functionality" via the machine-to-machine interface ECTA. On numerous occasions, the latest being the denial of Change Control Request CR0012 (Exhibit RMP-42), BellSouth has explained to AT&T that the ECTA architecture, built to the

National standards, is not compatible with 'TAFI functionality'. BellSouth has also told AT&T that we would be happy to design and build a **non-standard** machine-to-machine maintenance and repair interface for them. However, AT&T has failed to submit the required BFR to initiate this effort, presumably because AT&T doesn't want to pay for such a system.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 24.

A. BellSouth provides CLECs nondiscriminatory access to maintenance and repair functionality through the CLEC-TAFI and ECTA interfaces, as well as available manual processes. BellSouth is in compliance with the Telecommunications Act and is not required to provide any additional maintenance and repair interfaces. If AT&T desires a non-industry standard integrateable machine-to-machine interface that will provide TAFI functionality, then AT&T should submit a BFR and pay for the design and development of such an interface.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-36

This sheet transmits the

BellSouth Change Control Process Guide, Version 2.1 (Posted 2/9/01)

which consists of 100 pages.

BELLSOUTH

CHANGE CONTROL PROCESS

CCP2_9.DOC

VERSION 2.1

FEBRUARY 9, 2001

Issued: 2/9/01

Jointly Developed by the Change Control Sub-team comprised

of BellSouth and CLEC Representatives.

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VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1 Section 8 Section 11	- Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1 Section 2	- Added "testing" under process changes - Clarification provided in "Change Review Participants" description

			Participants" description.
		Section 4	- Added statement regarding submittal of Change Requests
		Part 2	- Clarification provided for documentation changes for business rules
			- Step 2-Added email notification
			- Step 3-Removed "Cancellation by BellSouth"
			- Step 3-Clarification on reject reasons
		Section 5	- Step 3-Clarification on internal validation activities
			- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround
			- Added defect implementation range
		Section 6	- Changed prioritization from "by interface" to "by category"
			- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days
			- Modified the prioritization voting rules
		Section 7	- Updates to the Introduction and Retirement of Interfaces
		Section 8	- Added Type 6 escalation turnaround time
			- Changed 3rd Level Escalation contacts for Types 2-6
		Section 11	- Removed "Cancellation by BellSouth" and "Defect Cancelled" definitions
		Appendix A	- Removed "Cancellation by BellSouth" from Change Request Form and Checklist
			- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.
		Appendix D	- Added BellSouth Versioning Policy

		All	Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover Section 3 Section 5 Section 10 Section 11-Terms & Definitions Appendix A All	- Removed "Interim" from cover. - Updated Type 6 definition to incorporate new defect and expedited feature definitions. - Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort. - Added Internet Web sites for EDI and TAG Testing Guidelines - Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts. - Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels. - Referenced the handling of expedites and expedite notification where appropriate.
2.1	02/09/01	Section 1 – Introduction Section 3 – Introduction Section 4 – Part 1 Type 1 Detail Process Flow	- Added new language to the 8th bulleted item – "including User Guides that support OSS sytems currently within the scope of CCP" - Added two new bulleted items dealing with the coordination of test agreements, and questions regarding existing documentation. - Added "language" for Types 2, 3, 4 & 5 – "Type xx changes may be managed using the Expedited Feature Process as discussed in Section 4, Part 3." - Type 6 – CLEC Impacting Defects – Added new defect definition. - Added #4 to the Activities – Step 1

			- Added additional sentence to Activity #1 – Step 2
		Section 4 – Part 2 – Types 2-5 Process Flow	- Added Activity #5 – Step 4
		Section 4 – Part 3 – Expedited Feature Process	- Added new Expedited Feature Process definition and flow
		Section 5 – Part 3 – Defect Process	- New Defect title page and definition. - Table 5-1 – Step 1 – Activity - #4 – Attach related requirements and specifications documents. These attachments **must** include the following, **if appropriate**. - Table 5-1 – Step 2 – Cycle Time – Replaced old cycle times with: 4 hrs for High Impact, 1 Bus Day for Medium and Low Impact. - Table 5-1 – Step 3 – Cycle Time – Replaced old cycle times with: 2 Bus Day for High Impact, and 3 Bus Days for Medium and Low Impact - Table 5-1 – Step 3 – Outputs – Added new bullet – "Status provided for High Impact Defects to originator via email with 24 hours" - Table 5-1 – Step 4 – Activity – Added language to Activity #3 - …and to the CLEC community via email and web posting. - Table 5-1 – Step 4 – Cycle Time – Replaced old cycle times with: 2 Bus Days for High Impact and 4 Bus Days for Medium and Low Impact. - Table 5-1 – Step 5 – Activity – Added language to #1 - …to the CLECs and BellSouth. Added language to Activity #2 - …defect is implemented. - Table 5-1 – Step 5 – Cycle Time – Replaced old cycle times to reflect: Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium

			4-25 business day range, best effort. Medium Impact will be implemented within 90 bus day, best effort. Low Impact will be implemented best effort.
		Part 1 – Change Review-Prioritization – Release Package Development and Approval	- Part 1 – Change Review Meeting – 4th paragraph NOTE: Added language to address meetings would occur in March, June, September and December - Part 2 – Change Review Meeting – 4th bullet – Added new bullet - …BellSouth's estimate of the size and scope of each Change Request. - Part 4 – Developing and Approving Release Packages – 1st bulleted item: New language
		Section 7 – Introduction and Retirement of Interfaces	- Retirement of Interfaces – 1st paragraph sentence: New language - Retirement of Versions – New Language - Retirement of Versions – Appeal Language - New Language for Type 6 High Impact Issues and Medium and Low Impact issues. - Types 2-6 Changes – 1st paragraph – new language.
		Section 8 – Escalation Process	- Types 2-6 Changes – Contact List for High, Medium and Low Impact escalations.
		Section 8 – Dispute Resolution Process	- New definition language
		Appendix A	- Updated CR form & checklist
		Appendix C	- Updated RF1874 User Registration Form

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, including User Guides that support OSS systems currently within the scope of CCP)
- Defects

The scope of the Change Control Process **does not** include the following which are handled through existing BellSouth processes:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- Coordination of test agreements will continue to be supported by the Account Team
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a defect change request should be submitted through Change Control

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/
Select "Local Exchange Carriers"
Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or

standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 6- CLEC Impacting Defects

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even thought software business requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects/expedites will be handled through the Change Control Process.

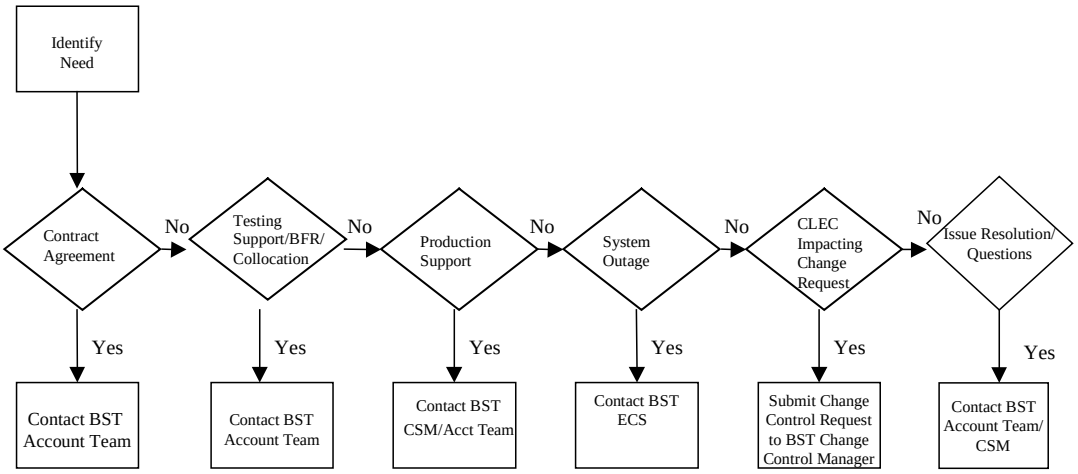
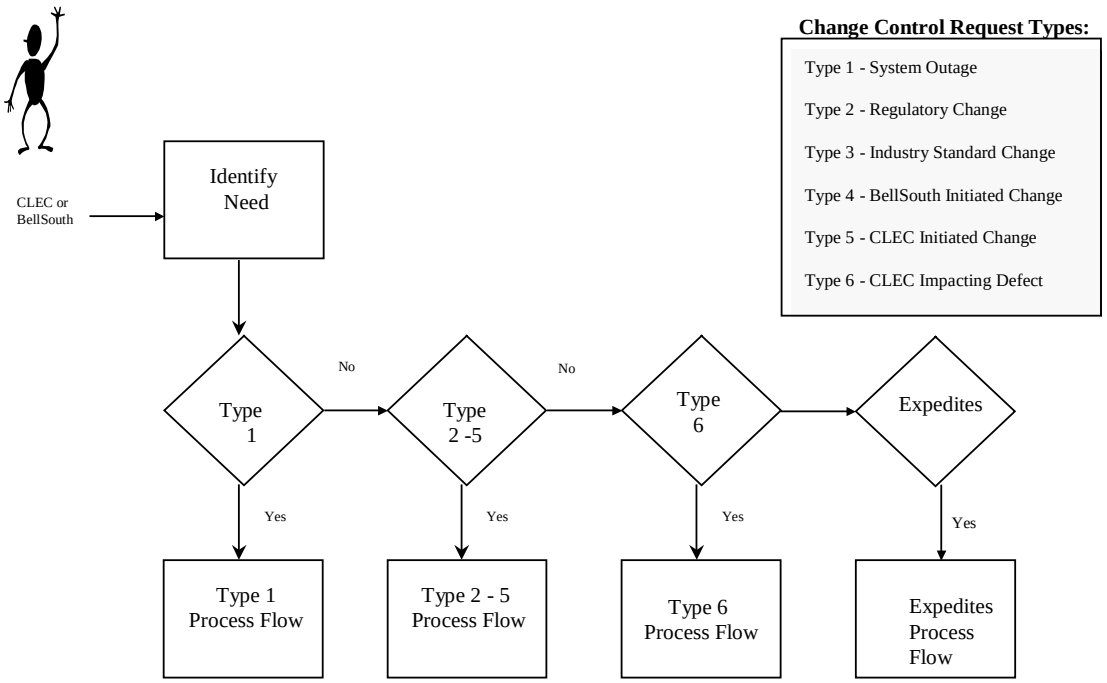


Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following three sub-sections describe the process flows for typical Type 1 through Type 5 changes, including expedited features. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth



representative to the appropriate process flow based on Change Control Request Type:

Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

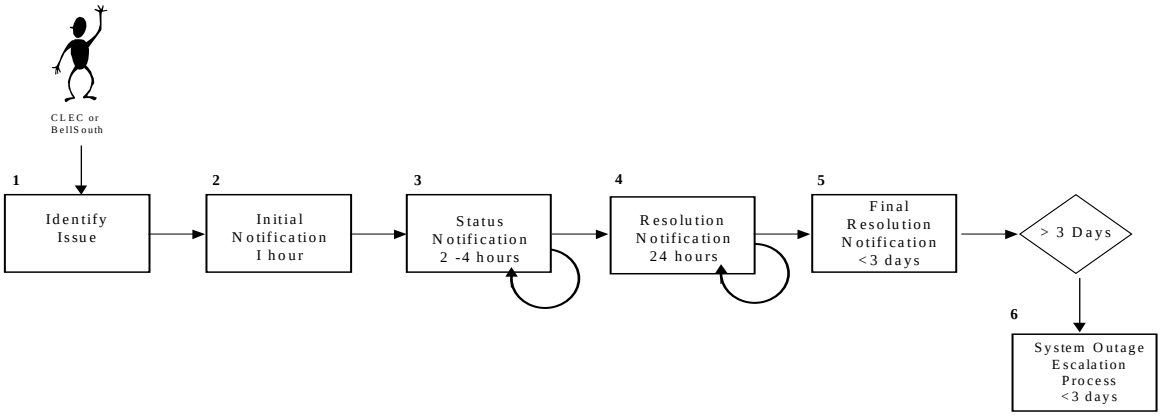


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 “Initial Notification” timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 “Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	**1** **Identify Issue**	**2** **Initial Notification**	**3** **Status Notification**	**4** **Resolution Notification**	**5** **Final Resolution Notification**	**6** **Escalation**
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	**CCCM** **ECS**	**IDENTIFY ISSUE:** 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the outage.	**INPUTS:** • Issue Characteristics • Call to ECS Helpdesk **OUTPUTS:** • Recorded Outage	N/A
2	**ECS**	**INITIAL NOTIFICATION:** 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. The system ticket number of the outage will be included in the web posting and the email notification. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis.	**INPUTS:** • Recorded Outage **OUTPUTS:** • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and posted to the

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		web.
3	**ECS**	**STATUS NOTIFICATION:** **(ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	**ECS** **CCCM**	**RESOLUTION NOTIFICATION:** **(ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect/expedite, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
5	**ECS**	**FINAL RESOLUTION NOTIFICATION:** 1. The final resolution notification is posted on the Web.	**INPUTS:** • Final Resolution Information **OUTPUTS:** • Final Resolution Notification	< 3 days
6	**CCCM** **ECS**	**ESCALATION** 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	**INPUTS:** • Information or concern relating to a Type 1 - Systems Outage **OUTPUTS:** • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

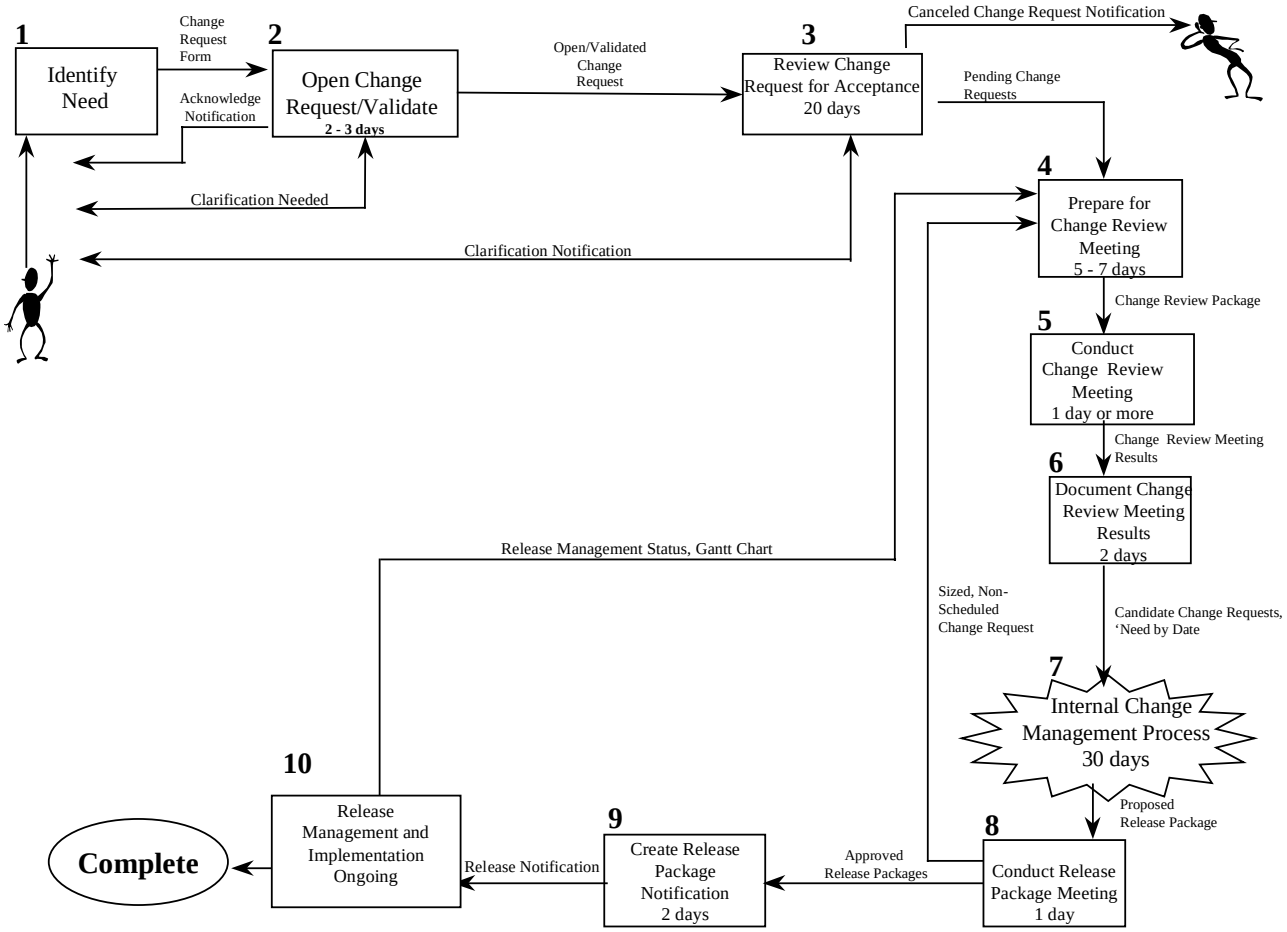


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- Software Release Notifications will be provided 30 days or more in advance of the implementation date.
- Documentation changes for business rules will be provided 30 days or more in advance of implementation date.
- CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	**CCCM** **BCCM**	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	**BCCM**	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status (‘N’ for New Request)	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	**OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	
3	**BCCM**	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or training issue forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. **NOTE**: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. BST may reject the change request based on the following reasons: cost, industry	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		direction or technically not feasible to implement and will provide notification to the originating party. Prior to rejecting a request, all options for accommodating the request will be exhausted. The rejection reason will be shared with the CLECs for input. **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	**BCCM** **CCCM**	**PREPARE FOR CHANGE REVIEW MEETING** NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. **BCCM** 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. 5. Provide size and scope information on each pending change request to CLECs. **CCCM** 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting.	**INPUTS:** • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log **OUTPUTS:** • Change Request Log • CLEC Draft Priority List • Size and scope on each Pending change request	5-7 Bus Days
5	**BCCM**	**CONDUCT CHANGE REVIEW MEETING**	**INPUTS:** • Change Request Log • CLEC Draft Priority List	1 Bus Day (or as needed

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
	CCCM	**Monthly Status Meetings** 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects/expedites) at monthly status meeting. 3. Review current Release Management statuses. **Prioritization Meetings (held quarterly in March, June, September and December)** 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. Discuss Impacts. 4. Prioritize Change Requests. 5. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. 6. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 7. Review issues and action items and assign owners.	• Desired/Want Dates • Impact analysis **OUTPUTS:** • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items (if required)	based on volume) Meeting Day
6	**BCCM**	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	**BCCM** **CCCM**	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities only to the Candidate Change Requests that meet the criteria established by the Internal	**INPUTS:** • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log	30 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Change Management Process. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	**OUTPUTS:** • BellSouth's Proposed Release Package	
8	**BCCM** **CCCM**	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process. 5. Based on BST/CLEC consensus create Approved Release Package. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting. 8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".	**INPUTS:** • BellSouth's Proposed Release Package • BellSouth's Release Schedule • Change Request Log **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • Non-Scheduled Change Requests (Return to Step 4) • Date for initial Release Management Project Meeting	1 Bus Day
9	**BCCM**	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	**BCCM** (Project Managers from each participating company)	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. 4. Once a Change Request is implemented in a release, the status will be changed to "I" for Change	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Implemented Change Request	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Implemented.		

PART 3 – EXPEDITED FEATURE PROCESS

An Expedited Feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories:

- A defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact
- An enhancement to an existing product or service where the CLEC/BellSouth has determined should be expedited due to impact

Re-classified Defects

When a defect is re-classifed as a feature, the CLEC/BellSouth will be notified by Change Control in the defect validation. The CLEC will have the ability to ask BellSouth to expedite the reclassified feature by updating the Change request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 Expedited Feature process using agreed upon intervals.

Enhancement to an existing product or service

A CLEC/BellSouth will also have the ability to submit a Type 2-5 change request as an expedited feature request for an enhancement to an existing product or service where the functionality does not currently exist in BellSouth's offered products and services.

For both re-classified defects and enhancements to an existing product or service, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the Expedited Feature Process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

Figure 4.4 provides the process flow for the expedited feature process.

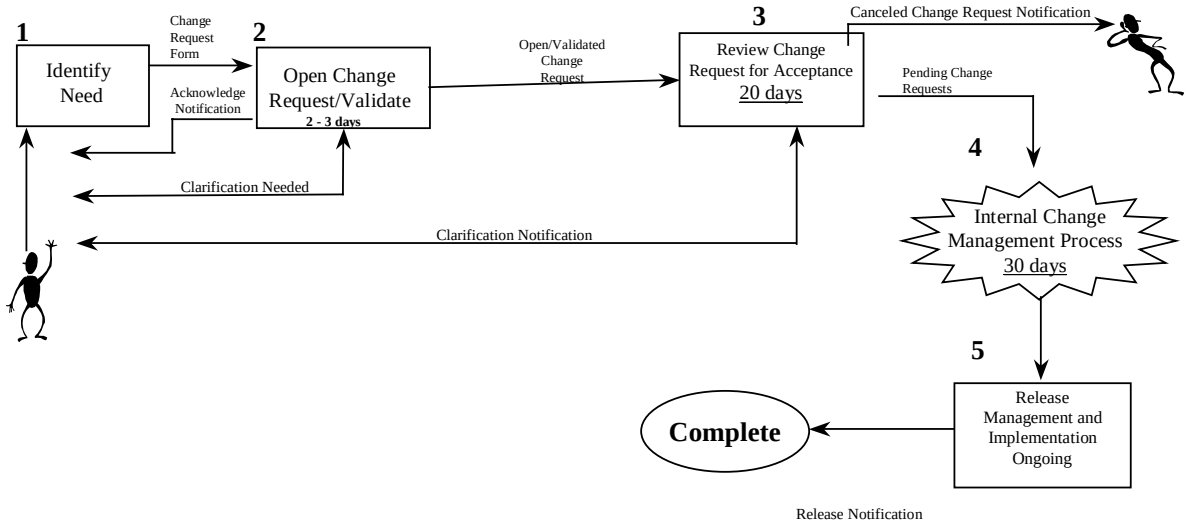


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Expedited Feature process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	**CCCM** **BCCM**	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and Attachment A-1A, Item 22. 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	**BCCM**	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	1 Bus Day Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
3	**BCCM**	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted area (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C" for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. • If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow, Step 4. **NOTE**: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth determines that a CLEC initiated expedited change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Validated Expedited Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	**BCCM** **CCCM**	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	**INPUTS:** • Change Request Log **OUTPUTS:** • Release Date for Expedited Feature	30 days
5	**BCCM** **(Project Managers from each participating company)**	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth User Requirements for software changes will be presented to CLECs, if applicable. If needed, changes will be incorporated and requirements re-baselined. 4. BellSouth Documentation changes, including business rules changes will be provided. 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Documentation Changes	Ongoing

5.0 DEFECT PROCESS

A CLEC/BST identified defect will enter this process through the Change Management Team as a Type 6 Change Request. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels:

- **High Impact**

  The failure causes impairment of critical system functions and no electronic workaround solution exists.

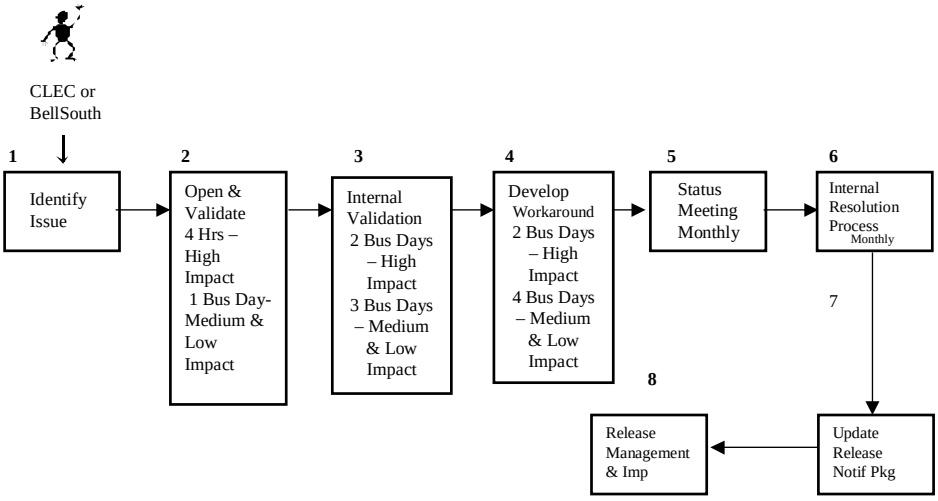
- **Medium Impact**

  The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

  The failure causes inconvenience or annoyance.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect/Expedite.



NOTE: The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	**CCCM** **BCCM**	**IDENTIFY NEED** 1. Identify Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments must include the following, if appropriate: • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 5. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 6 Change Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	**BCCM**	**OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS** 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status (‘N’ for New Defect). 4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:** • New Defect • Acknowledgment Notification • Clarification Notification (if	4 Hours – High Impact 1 Bus Day – Medium & Low Impact (Time to be calculated from time of

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Request Form Checklist. 5. Verify specifications and related information exists. 6. Send Clarification Notification via email to the originator if needed. 7. Update CR Status to‘ PC’ for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.	required)	receipt with a cutoff time of 4:00 PM Eastern Time)

3	**BCCM**	**INTERNAL VALIDATION**
		1. Validate that it is a defect.
		2. Perform internal defect analysis.
		3. Determine status of request:
		• If change already exists or CLEC training issue forward Cancellation Notification to CCCM or BCCM and update status to ‘C’ for Request Cancelled or ‘CT’ for Training. If Training issue, refer to CSM or Account Team.
		  • Send Clarification Notification via email if needed and update status to ‘PC’ for Pending Clarification.
		  • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed.
		  • If request is valid, update Change Request status to ‘V’ for Validated Defect and indicate appropriate Impact Level.
		  • If the process is operating as specified in the baselined requirements and published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s).
		• If issue is re-classified as a standard feature change, provide supporting information via email to the originator
			INPUTS:
			• New Defect
			
			OUTPUTS:
			• Validated Defect
			• Defect notification to CLEC community via e-mail and web posting
			• Clarification Notification (if required)
			• Cancellation Notification (if required)
			• Status provided for High Impact Defects to originator via email within 24 hours.
				2 Bus Days – High Impact
				
				3 Bus Days – Medium & Low Impact

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3). **NOTE**: See Section 9.0 Terms and Definitions – Defect Status for valid status codes and descriptions. Defect notification will be provided to CLEC community via e-mail and web posting.		
4	**BCCM**	**DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)** 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via email and web posting. **4.** If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.	**INPUTS:** • Validated Defect • Clarification Notification (if required) **OUTPUTS:** • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • E-mail and web posting of workaround	2 Bus Days – High Impact 4 Bus Days – Medium & Low Impact
5	**BCCM**	**INTERNAL RESOLUTION PROCESS** 1. Schedule and evaluate Defects based on capacity and business impacts to the CLECs and BellSouth. 2. Provide status updates to the CLEC community via email as the status changes until the defect is implemented.	**INPUTS:** • CLEC/ BST input **OUTPUTS:** • Defect Release Schedule	Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium Impact Defects will be implemented

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
				within 90 bus days, best effort. Low Impact Defects will be implemented best effort.
6	**BCCM**	**UPDATE RELEASE PACKAGE NOTIFICATION** 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". **Note**: The release notification will be published in a timely manner, based on the release constraints associated with the defect.	**INPUTS:** • Defect Feature Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for defects (may be less than 30 days).
7	**BCCM**	**MONTHLY STATUS MEETING** 1. Provide status of Defect. 2. Solicit CLEC/ BST input. 3. Update Defect information as needed.	**INPUTS:** • Defects Received • Change Request Log • Defect Analysis • Workaround (if applicable) **OUTPUTS:** • Updated status • Updated Change Request Log • Meeting minutes	Monthly or when status changes, whichever occurs first.
8	**BCCM**	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 6 changes: 1. Lead project manager communicates release management project status to	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		BCCM for inclusion in Monthly status meetings. 2. Once a defect is implemented in a release, the status will be changed to "I" for Change Implemented.	• Implemented Change Request	

6.0 CHANGE REVIEW

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be held quarterly. For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's estimate of the size and scope of each Change Request
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish "desired/want" dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and documentation will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30 – 45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC Community. As new interfaces are deployed, they will be added to the scope of this document as appropriate, based on the use by the CLEC community and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Retirement of Versions

When software versions are retired, BellSouth will give the CLECs a 120 day notification.

A CLEC may respond to Change Control with its desire to extend a retirement date. The CLEC must explain why the scheduled retirement date is not acceptable by providing the impact to it business.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.(Excludes Expedites)
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.
- For Type 6 High Impact Issues, the escalation process is agreed to allow BellSouth a two (2) day turnaround to provide a status for each cycle of escalation.
- For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a five (5) day turnaround to provide a status for each cycle of escalation. For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	**Don Tighe** **Manager - EC Support Group** **Interconnection Operations**	**404-532-2233**	**1-800-946-4646 PIN 1436470**	**Don.Tighe@bridge.bellsouth.com**
2nd Level	**Bruce Smith** **Operations Director - EC Support Group** **Interconnection Operations**	**205-988-7211**	**1-800-542-3260**	Bruce.Smith@bridge.bellsouth.com
3rd Level	**Bill Reid** **Operations Assistant Vice President** **Interconnection Operations**	**205-988-1447**	**1-800-946-4646 PIN 1179523**	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
  - Definition and escalation of item.
  - History of item.
  - Reason for escalation.
  - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Types 2-5 Changes: Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 6, High Impact Changes: Within two (2) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 6 Medium and Low Impact Changes: Within five (5) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	**Valerie Cottingham** **Sales Director Change Control Process**	**205-321-2168**	Valerie.cottingham@bridge.bellsouth.com
2nd Level	**Terrie Hudson Director (for Systems Issues)** **Joy Lofton Director (for Business Rules/Operations Issues)**	**404-927-4535** **404-927-7828**	**Terrie.Hudson@bridge.bellsouth.com** Joy.A.Lofton@bridge.bellsouth.com
3rd Level	**Doug McDougal Senior Director (for Systems Issues)** **Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)**	**404-927-7505** **404-927-3545**	Doug.Mcdougal@bridge.bellsouth.com Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.

- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings. All changes will be submitted as a change request and reviewed.

10.0 TESTING ENVIRONMENT

BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, refer to the following BellSouth public Internet sites:

EDI

www.interconnection.bellsouth.com/markets/lec.html
Select "Customer Guides"
Select "Local Exchange Ordering Guides"
Select "BellSouth EDI Specifications – TCIF 9"
Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html
Select "OSS Information Center"
Select "TAG Documentation"

This site is password protected. You should obtain the password from your Account Team representative.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing Change Requests and defects/expedites.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
  - ◊ Dependencies relative to other data elements
  - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: BST cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects/expedites or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- Type 2-5 – Expedited Feature Change. The inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) A defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an enhancement to an existing product or service where the CLEC/BellSouth has determined should be expedited due to impact.
- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.

Type 6 – CLEC Impacting Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even thought software business requirements and business rules match; this will be addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3. The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.

- **CT = Training.** Requested change already exists, additional training may be required.

- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).
- **D =** Request Purge. Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled**. Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even thought software business requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Defect Status. The status of a CLEC Impacting Defect Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):

- **CC = Clarification.** Requested clarification not received in allotted time (2 days).
- **CD = Duplicate Request.** A request for this change already exists.
- **CT = Training.** Requested change already exists, or CLEC training issue.

- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Expedited Feature. An expedited feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an enhancement to an existing product or service where the CLEC/BellSouth has determined

should be expedited due to impact. For both re-classified defects and enhancements to an existing product or service, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the Expedited Feature process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 that are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect and/or Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of “point releases” (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final “point release” of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

BELLSOUTH

Change Request Form

Complete and email this form to Change.Control@bridge.bellsouth.com or Fax to BellSouth Interconnection Services at 205-321-5160. Please note that line-by-line instruction is attached for completion of this form.

Internal Reference # (1) - _____ Date Change Request Submitted (2) - _____

☐ **TYPE 2 (REGULATORY)** ☐ **TYPE 3 (INDUSTRY)** ☐ **TYPE 4 (BST)** ☐ **TYPE 5 (CLEC)**

☐ **TYPE 6 (DEFECT)*** NOTE: IF TYPE 6, COMPLETE PAGE 3 ☐ **EXPEDITED FEATURE**

COMPANY NAME (4) : _____ OCN(3A): _____

CCM (5): _____ PHONE (6): _____

CCM EMAIL ADDRESS (7): _____ FAX(8): _____

ALTERNATE CCM (9): _____ ALT PHONE # (10): _____

ORIGINATOR'S NAME (11): _____ PHONE (12): _____

TITLE OF CHANGE/REQUEST(13): _____

Category (14): ☐ ADD NEW FUNCTIONLITY ☐ CHANGE EXISTING DESIRED DUE DATE (15): _____

ORIGINATING CCM ASSESSMENT OF IMPACT (16) ☐ HIGH ☐ MEDIUM ☐ LOW

ORIGINATING CCM ASSESSMENT OF PRIORITY (17) ☐ URGENT ☐ HIGH ☐ MEDIUM ☐ LOW

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☐ LNP ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☐ Software	☐ Hardware	☐ Industry Standards	☐ Defect
☐ Product & Services	☐ New or Revised Edits	☐ Process	☐ Expedited Feature
☐ Documentation	☐ Regulatory	☐ Other	

DESCRIPTION OF REQUESTED CHANGE INCLUDING PURPOSE AND BENEFIT RECEIVED FROM THIS CHANGE. (Use additional sheets, if necessary) (20):

KNOWN DEPENDENCIES (21):

ADDITIONAL INFORMATION (22) : ☐ YES ☐ NO
LIST ALL BUSINESS SPECIFICATIONS AND/OR REQUIREMENTS DOCUMENTS INCLUDED (OR INTERNET / STANDARDS LOCATION, IF APPLICABLE) :

This Section to be completed by BCCM only.

Attachment A-1

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

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Change Request Form

CHANGE REQUEST LOG # (23): **CR**_____ CLARIFICATION (24) ☐ YES ☐ NO

CLARIFICATION REQUEST SENT (25) : _____ CLARIFICATION RESPONSE DUE (26) _____

STATUS (27) _____

CHANGE REQUEST REVIEW DATE (28: _____ TARGET IMPLEMENTATION DATE (29) _____

LAST MODIFIED BY (30) _____ DATE MODIFIED (31) _____

CHANGE REVIEW MEETING RESULTS (32):

CANCELED CHANGE REQUEST (33) ☐ DUPLICATE ☐ TRAINING ☐ CLARIFICATION NOT RECEIVED

CANCELLATION ACKNOWLEDGMENT (34): CLEC _____ BST _____ DATE _____

REQUEST APPEAL (35) ☐ YES ☐ NO

APPEAL CONSIDERATIONS (36):

AGREED RELEASE DATE (37): _____

CMVC # (38) _____
DDTS# (39) _____

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

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Change Request Form

This section to be completed by CLEC/BellSouth – External Explanation of Type 6-Defect Change Request

PON #: _____

ERROR MESSAGE: _____

RELEASE OR API VERSION (If applicable): _____

DESCRIPTION OF DEFECT SCENARIO:

This section to be completed by BellSouth – Internal Validation of Defect Change Request

Defect Validation Results: (40)

CLARIFICATION NEEDED: ☐ YES ☐ NO

☐ DEFECT ☐ FEATURE ☐ TRAINING ISSUE ☐ DUPLICATE

DEFECT IMPACTS OTHER CLECS? ☐ YES ☐ NO

INTERFACES IMPACTED BY DEFECT: ☐ EDI ☐ TAG ☐ LNP ☐ LENS

☐ TCIF 7 ☐ TCIF 9

TARGET IMPLEMENTATION DATE: _____

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8/00

Change Request Form Checklist

All fields will be validated before change request is returned for clarification.

Field	Checklist	Description	Instructions	Action Required
1	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	No action	
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	Date entry required
3	Mandatory	Indicate type of Change Request: CLEC or BST Initiated, Industry Standard or Regulatory.	Return to sender	Company designation required
3a	Conditional	Indicate whether Change Request is a defect/expedite. Also provide OCN to assist with internal validation of defect/expedite.	Return to sender	Entry required (if the change is a defect)
4	Mandatory	Enter company name for the Change Request.	Return to sender	Company name required
5	Mandatory	Enter originating company's Change Control Manager's name.	Return to sender	CCM name required
6	Mandatory	Enter originating company's Change Control Manager's phone number.	Return to sender	CCM phone number required
7	Mandatory	Enter originating company's Change Control Manager's e-mail address.	Return to sender	CCM e-mail address required
8	Mandatory	Enter originating company's CCM's fax number.	Return to sender	CCM fax number required
9	Mandatory	Enter originating company's alternate contact name.	Return to sender	Alternate contact name required
10	Mandatory	Enter originating company's alternate contact phone number.	Return to sender	Alternate contact number required
11	Optional	Optional field for the company's internal SME requesting enhancement. This field can be for internal use only or you can choose to share it.	No action	No action
12	Optional	Optional field for the company's internal SME's phone number requesting enhancement. This field can be for internal use only or you can choose to share it.	No action	No action
13	Mandatory	For the purpose of referencing the Change Request, assign a short, but descriptive name.	Return to sender	Title required – maximum length 40 char.
14	Mandatory	Identify request category for the Change Request.	Return to sender	Category required
15	Optional	Enter desired implementation due date for the proposed enhancement.	No action	No action
16	Mandatory	Identify originating company assessment of impact.	Return to sender	Entry required
17	Mandatory	Identify originating company assessment of priority.	Return to sender	Entry required
18	Mandatory	Indicate interface(s) affected by the proposed Change Request.	Return to sender	Entry required
19	Mandatory	Indicate the type of change for the request.	Return to sender	Entry required
20	Mandatory	Describe the proposed change request, indicating the purpose and benefit of request. If additional space is needed, use additional space sheet.	Return to sender	Description of change request required
21	Mandatory	Indicate any known dependencies relative to the Change Request. If none are known, enter "None known".	Return to sender	Entry required

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.

Change Request Form Checklist

Field	Checklist	Description	Instructions	Action Required
22	Mandatory	Indicate whether additional information accompanies/supports the proposed Change Request. If yes, list all documents attached or reference where they can be found, including internet address and standards reference, if applicable.	Return to sender	Supporting documentation must accompany request
23	Mandatory BCCM	A Change Request Log Number generated by "the Change Request Logging system" upon receipt of change request. The number should be sent back to the originator on the acknowledgment receipt. This # will be used to track the Change Request.	Return to sender	Log number - system generated.
24	Conditional BCCM	Indicates whether clarification is needed on the Change Request.		
25	Conditional BCCM	Date clarification request sent to originating CCM.		
26	Conditional BCCM	Date clarification due back from originating CCM.	Return to sender	
27	Mandatory BCCM	Indicate status of proposed change request (I.e. clarification, validation, pending, etc.)		
28	Mandatory BCCM	Assign date when change request will appear on Review Board agenda.	Return to sender	
29	Mandatory BCCM	A soft date for implementation. Updated based on Candidate Release Package info.		
30	Mandatory BCCM	Field that communicates who last updated the request.		
31	Mandatory BCCM	Field that communicates when the last update occurred		
32	Mandatory BCCM	Change Request results captured from the Change Review meeting.		
33	Conditional BCCM	Canceled Change Request reasoning.	Return to sender	
34	Conditional BCCM	Concurrence with Change Request originating company. Show date of concurrence.	Return to sender	
35	Conditional BCCM	Change Request Appeal indication.		
36	Conditional BCCM	Detailed description of the appeal considerations.		
37	Mandatory BCCM	Indicate agreed release date from Project Release Plan.		
38	Conditional BCCM	Indicate CMVC reference Number		
39	Conditional BCCM	Indicate DDTS reference Number		
40	Mandatory BCCM	Results of Internal Defect/Expedite Validation		

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Change Request Clarification Response

Complete and email this form to Change.Control@bridge.bellsouth.com or Fax to BellSouth Interconnection Services at 205-321-5160. Please note that line-by-line instruction is attached for completion of this form.

Internal Reference # (1) - _____ Date Change Request Submitted (2) - _____

☐ **TYPE 2 (REGULATORY)** ☐ **TYPE 3 (INDUSTRY)** ☐ **TYPE 4 (BST)** ☐ **TYPE 5 (CLEC)**

☐ **TYPE 6 (DEFECT)*** NOTE: IF TYPE 6, COMPLETE PAGE 3 ☐ **EXPEDITED FEATURE**

COMPANY NAME (4) : _____ OCN(3A): _____

CCM (5): _____ PHONE (6): _____

CCM EMAIL ADDRESS (7): _____ FAX(8): _____

ALTERNATE CCM (9): _____ ALT PHONE # (10): _____

ORIGINATOR'S NAME (11): _____ PHONE (12): _____

TITLE OF CHANGE/REQUEST(13): _____

Category (14): ☐ ADD NEW FUNCTIONLITY ☐ CHANGE EXISTING DESIRED DUE DATE (15): _____

ORIGINATING CCM ASSESSMENT OF IMPACT (16) ☐ HIGH ☐ MEDIUM ☐ LOW

ORIGINATING CCM ASSESSMENT OF PRIORITY (17) ☐ URGENT ☐ HIGH ☐ MEDIUM ☐ LOW

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☐ LNP ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☐ Software	☐ Hardware	☐ Industry Standards	☐ Defect
☐ Product & Services	☐ New or Revised Edits	☐ Process	☐ Expedited Feature
☐ Documentation	☐ Regulatory	☐ Other	

DESCRIPTION OF REQUESTED CHANGE INCLUDING PURPOSE AND BENEFIT RECEIVED FROM THIS CHANGE. (Use additional sheets, if necessary) (20):

KNOWN DEPENDENCIES (21):

ADDITIONAL INFORMATION (22) : ☐ YES ☐ NO

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.

Change Request Clarification Response

LIST ALL BUSINESS SPECIFICATIONS AND/OR REQUIREMENTS DOCUMENTS INCLUDED (OR INTERNET / STANDARDS LOCATION, IF APPLICABLE) :

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2/01

Change Request
Clarification Response Checklist

All fields will be validated before change request is returned for clarification.

Field	Checklist	Description	Instructions	Action Required
1	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	No action	
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	Date entry required
3	Mandatory	Indicate type of Change Request: CLEC or BST Initiated, Industry Standard or Regulatory.	Return to sender	Company designation required
3a	Conditional	Indicate whether Change Request is a defect/expedite. Also provide OCN to assist with internal validation of defect/expedite.	Return to sender	Entry required (if the change is a defect)
4	Mandatory	Enter company name for the Change Request.	Return to sender	Company name required
5	Mandatory	Enter originating company's Change Control Manager's name.	Return to sender	CCM name required
6	Mandatory	Enter originating company's Change Control Manager's phone number.	Return to sender	CCM phone number required
7	Mandatory	Enter originating company's Change Control Manager's e-mail address.	Return to sender	CCM e-mail address required
8	Mandatory	Enter originating company's CCM's fax number.	Return to sender	CCM fax number required
9	Mandatory	Enter originating company's alternate contact name.	Return to sender	Alternate contact name required
10	Mandatory	Enter originating company's alternate contact phone number.	Return to sender	Alternate contact number required
11	Optional	Optional field for the company's internal SME requesting enhancement. This field can be for internal use only or you can choose to share it.	No action	No action
12	Optional	Optional field for the company's internal SME's phone number requesting enhancement. This field can be for internal use only or you can choose to share it.	No action	No action
13	Mandatory	For the purpose of referencing the Change Request, assign a short, but descriptive name.	Return to sender	Title required – maximum length 40 char.
14	Mandatory	Identify request category for the Change Request.	Return to sender	Category required
15	Optional	Enter desired implementation due date for the proposed enhancement.	No action	No action
16	Mandatory	Identify originating company assessment of impact.	Return to sender	Entry required
17	Mandatory	Identify originating company assessment of priority.	Return to sender	Entry required
18	Mandatory	Indicate interface(s) affected by the proposed Change Request.	Return to sender	Entry required
19	Mandatory	Indicate the type of change for the request.	Return to sender	Entry required
20	Mandatory	Describe the proposed change request, indicating the purpose and benefit of request. If additional space is needed, use additional space sheet.	Return to sender	Description of change request required
21	Mandatory	Indicate any known dependencies relative to the Change Request. If none are known, enter "None known".	Return to sender	Entry required

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.

Change Request
Clarification Response Checklist

Field	Checklist	Description	Instructions	Action Required
22	Mandatory	Indicate whether additional information accompanies/supports the proposed Change Request. If yes, list all documents attached or reference where they can be found, including internet address and standards reference, if applicable.	Return to sender	Supporting documentation must accompany request

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Change Request
Clarification Response Checklist

Attachment A-2A

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

Acknowledgment Notification (Sample)

1) **Change Request Log #:** *878*

(2) **Date Change Request Submitted:** *04/01/1998*

(3) **Date Change Request Received:** *04/01/1998*

(4) **Internal Reference #:** *ARX00000*

(5) **Date of Notification:** *04/04/1998*

(6) **Company Name:** *John Doe Telephone*

(7) **Title of Change:** *Creation of new EDI transaction for jeopardy processing – 870 transaction number.*

(8) **Request Category:** *Add New Functionality*

(9) **Response due date:** *04/08/1998*

(10) **BCCM Contact name**_____ (11) **Phone**_____

Cancellation Notification (Sample)

(1) **Change Request Log #:** *878*

(2) **Date Change Request Submitted:** *04/01/1998*

(3) **Date Change Request Received:** *04/01/1998*

(4) **Internal Reference #:** *ARX00000*

(5) **Date of Notification:** *04/04/1998*

(6) **Company Name:** *John Doe Telephone*

(7) **Title of Change:** *Creation of new EDI transaction for jeopardy processing – 870 transaction number.*

(8) **Cancellation Type:** *Duplicate Request*

(9) **Cancellation Acknowledgment Date:** *05/15/1998*

(10) **Cancellation Explanation:** *Same functionality as Change Request RWR52434.*

(11) **BCCM Contact name**_____ (12) **Phone**_____

Acknowledgment Notification Checklist

All fields will be validated prior to sending the Acknowledgment Notification.

Field	Checklist	Description	Instructions	Action Required
1	Mandatory	A Change Request Log Number generated by "the Change Request Logging system".	Return to sender	Log number - system generated.
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	
3	Mandatory	Date Change Request received by BCCM.	Return to sender	
4	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	Return to sender (if used).	No action.
5	Mandatory	Date of Change Request Notification.	Return to sender	Current system date/time.
6	Mandatory	Originating Company name of the Change Request.	Return to sender	
7	Mandatory	A short, but descriptive name (title) for referencing the Change Request.	Return to sender	
8	Mandatory	Identify request category for the Change Request.	Return to sender	
9	Mandatory	Response due date.	Return to sender	
10	Mandatory	BCCM Contact Name.	Return to sender	
11	Mandatory	BCCM Contact Phone Number	Return to sender	

Cancellation Notification Checklist

All fields will be validated prior to sending the Cancellation Notification.

Field	Checklist	Description	Instructions	Action Required
1	Mandatory	A Change Request Log Number generated by "the Change Request Logging system".	Return to sender	Log number - system generated.
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	
3	Mandatory	Date Change Request received by BCCM.	Return to sender	
4	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	Return to sender (if used).	No action.
5	Mandatory	Date of Change Request Notification.	Return to sender	Current system date/time.
6	Mandatory	Originating Company name of the Change Request.	Return to sender	
7	Mandatory	A short, but descriptive name (title) for referencing the Change Request.	Return to sender	
8	Mandatory	Canceled Change Request reasoning.	Return to sender	
9	Mandatory	Cancellation Acknowledgment Date	Return to sender	
10	Mandatory	BCCM Contact Name.	Return to sender	
11	Mandatory	BCCM Contact Phone Number	Return to sender	

Clarification Notification (Sample)

(1) **Change Request Log #:** *878*

(2) **Date Change Request Submitted:** *04/01/1998*

(3) **Date Change Request Received:** *04/01/1998*

(4) **Internal Reference #:** *ARX00000*

(5) **Date of Notification:** *04/04/1998*

(6) **Company Name:** *John Doe Telephone*

(7) **Title of Change:** *Creation of new EDI transaction for jeopardy processing – 870 transaction number.*

(8) **Request Category:** *Add New Functionality*

(9)[1] **Please Clarify:**

- ☐ Date Change Request Submitted (2)
- ☐ Company Name (4)
- ☐ CCM Phone (6)
- ☐ Fax (8)
- ☐ Alternate Phone (10)
- ☐ Category (14)
- ☐ Priority (17)
- ☐ Type of Change (19)
- ☐ Known dependencies (21)
- ☐ TYPE (3)
- ☐ CCM (5)
- ☐ CCM E-mail (7)
- ☐ Alternate CCM (9)
- ☐ Title of Change (13)
- ☐ Assessment of Impact (16)
- ☐ Interfaces affected (18)
- ☐ Description (20)
- ☐ Additional Information (22)

(10) **Response due by:** *04/08/1998*

(11) **BCCM Contact name**_____ (12) **Phone**_____

[1] The individual field references correspond directly to the Change Request Form.

Clarification Notification Checklist

Field	Checklist	Description	Instructions	Action Required
1	Mandatory	A Change Request Log Number generated by "the Change Request Logging system".	Return to sender	Log number - system generated.
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	
3	Mandatory	Date Change Request received by BCCM.	Return to sender	
4	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	Return to sender (if used).	No action
5	Mandatory	Date of Change Request Notification.	Return to sender	Default to current system date/time.
6	Mandatory	Originating Company name of the Change Request.	Return to sender	
7	Mandatory	A short, but descriptive name (title) for referencing the Change Request.	Return to sender	
8	Mandatory	Request Category	Return to sender	
9	Mandatory	Clarification Considerations - Numbers in parentheses refer to corresponding fields on the Change Request Form.	Return to sender	
10	Mandatory	Response due by date.	Return to sender	
11	Mandatory	BCCM Contact Name.	Return to sender	Default to BCCM.
12	Mandatory	BCCM Contact Phone Number	Return to sender	Default to BCCM Number.

BELLSOUTH

DATE _____

Letter of Intent

_____ gives this notice of its intent to implement a TCIF compliant interface for pre-ordering, ordering, or maintenance transactions with BellSouth, Inc. We are currently finalizing the development phase with a planned implementation date of _____.

Interfaces	❑ Pre-Ordering	❑ Ordering	❑ Maintenance
	❑ TAG	❑ EDI	❑ EC-TA Local
	❑ LENS	❑ TAG	❑ TAFI
		❑ LENS	

Comments:

Committing the Company: _____
(Print Name)

(Signature) _____

Return To: BCCM OR Valerie Cottingham
FAX 205-321-5160
8TH Floor
600 No. 19th Street
Birmingham, Alabama 35203

The CLEC agrees that it will begin commercial use of the interface selected above within six (6) months from the date of this LOI, and further agrees that if commercial usage does not begin within six (6) months, that this LOI will be canceled.

Release Management Project Plan Template

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Scope Statement

The project scope defines the boundaries by which the project will operate. The scope statement will be used to obtain agreement and approval from the customers and stakeholders for the project funding.

See Scope Statement Template

Communication Plan

The project team will determine the type and frequency of communications that must take place during the project life cycle to enable the project's success. The table below outlines the agreed to communication vehicles.

Status Communiqué	Distribution	Frequency	Owner
Project Release Status Report	• Team Members • Enhancement Review Team	• Weekly • Monthly	Project Manager
Team Member To Do List	• Team Member	• Weekly	Project Manager
Executive Summary	• Project Sponsor	• Monthly	Project Manager
Status Meeting/Minutes	• Team Members	• Weekly	Project Manager

All escalations will be communicated by the project manager to the project sponsor.

See Project Release Status Report
See CCP To Do List/Resource (part of Microsoft Project file - Custom Report)
See CCP To Do List/Dates (part of Microsoft Project file - Custom Report)

Project Tracking Plan

Project tracking and control is the process whereby the project manager determines the degree to which the project plan is being met. The focus is on the schedule, budget and resource allocations.

The project manager will hold regularly scheduled team meetings for the purpose of updating the Work Breakdown Schedule (WBS) with accurate information. During these meetings, all new issues will be raised and assigned to an owner for resolution. All existing issues will be reviewed for current status and/or closure.

Other documents to be updated during the team meetings are as follows:

- Change Control Plans
- Risk Management Plans
- Communication Plans
- Scope Statements
- Team Roster and Responsibilities

Project status will be created and distributed as defined in the Communications Plan.

Work Breakdown Structure

The project manager will develop a Work Breakdown Structure (WBS) in the appropriate project management software application, including tasks, durations, start/end dates, dependencies, personnel resources, and related costs. A draft version of the WBS will be created by the project manager and reviewed with the project team in an effort to effectively utilize the team's time. The WBS will be revised and agreed to by the entire team to facilitate activity ownership and commitment.

While creating the WBS, the team should consider all resource, time, budget and performance constraints associated with the project.

See WBS Template (part of Microsoft Project file - Gantt View)

Roles and Responsibilities

Project roles will be defined to clearly identify expectations among project participants. Update the table below with the correct project roles and responsibilities.

ROLES	RESPONSIBILITIES
Project Manager	Identify Preliminary Resources Hold Kick-off Meeting Develop Project Plan Documents Track Project Status Time Cost Manage Change Control Manage Issues Communicate Project Status
Project Sponsor	Understand Current Project Status Single Point of Contact for Escalations Communicate Project Status Define/Approve Milestone Exit Criteria
Stakeholder	Provide Team Members / External Project Support Understand Current Project Status Define Milestone Exit Criteria
External Project Support	Perform Agreed to Activities as Defined Provide Project Manager Status
Team Members	Attend Project Team Meetings Perform Agreed to Activities as Defined Provide Project Manager Status

Project Team Roster

A list of all parties associated with or impacted by the project should be documented and distributed to the team.

See Project Team Roster

Risk Management Plan

In an effort to mitigate possible negative impacts to the project, a high-level risk assessment should be performed during the initial phase of the project. For each high-level risk, the team should develop a mitigation strategy or position. As potential risks are identified during the project life cycle, the team should again develop a mitigation strategy or position.

See High-Level Risk Assessment
See Risk Event Assessment and Planning

Change Control Plan

Throughout the project life cycle, changes will be introduced which will impact the project scope statement. These changes could be due to a new customer need/requirement or a miss communication of an existing requirement. Each change must be evaluated to effectively understand the possible impact to resources, time and/or cost.

See Scope Change Request and Evaluation
See Scope Change Request Log

Project Issues

Day to day issues will be entered on a project issues log as an interim solution until further discussion can take place among the team. Each issue could result in the addition of a new activity to the WBS, a risk to be evaluated in the Risk Management Plan, or a change to be managed through the Change Control Plan.

See Project Issue Log

Scope Statement Template

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Project Definitions

PROJECT TITLE	
PROJECT MANAGER	
PROJECT TEAM MEMBERS	
GOALS/OBJECTIVES	
SCOPE STATEMENT	
ASSUMPTIONS	
MAJOR RISKS	
DELIVERABLES	
ACCEPTANCE CRITERIA	
PHASES	
KEY MILESTONES	
KEY RESOURCE REQUIREMENTS	
EXTERNAL CONSTRAINTS	
RELATED PROJECTS	

Project Release Status Report

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

PROJECT MANAGER	CURRENT PROJECT PHASE	SUPPORTING DOCUMENTATION ATTACHED?	WEEK ENDING DATE
		☐ Yes ☐ No	

Report Information

Status Changes from Last Report	✓	Explain
Assumptions	☐	
Scope	☐	

Schedule Information

High-Level Phase Deliverable	Original Complete Date	New Est. Complete Date	Actual Complete Date	Explanation

Budget Information

Project Tracking Element	YTD Budget	YTD Actual	YTD Diff.	% Diff.	Explanation

Deliverable Information

COMPLETED DELIVERABLES
DELIVERABLES DUE NEXT PERIOD

Work Breakdown Structure Template

Project Management WBS Template						
ID	**Task Name**	**Duration**	**Start**	**Finish**	**Pred**	**Resource**
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
2	**Define Requirements**	**3d**	**1/9/98**	**1/13/98**		
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
4	Meet to Baseline Requirements (several meetings)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
6	**Perform Analysis**	**4d**	**1/14/98**	**1/19/98**		
7	Analyze Requirements Document	1d	1/14/98	1/14/98	5	BST
8	Produce/Distribute Updated Requirements Document	1d	1/15/98	1/15/98	7	BST
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
10	Analyze/Finalize Updated Requirements Document	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code, unit test)	1d	1/20/98	1/20/98	10	All
12	**Perform Testing**	**5d**	**1/20/98**	**1/26/98**		
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
14	Perform Internal Testing (systems, integration)	1d	1/21/98	1/21/98	13, 11	All
15	**Perform External Testing**	**3d**	**1/22/98**	**1/26/98**		
16	Perform Network Validation Testing (NVT)	1d	1/22/98	1/22/98	14	All
17	Perform End to End Testing	1d	1/23/98	1/23/98	16	All
18	Perform Stress/Volume	1d	1/26/98	1/26/98	17	All
19	Make Go/No Go Decision	1d	1/27/98	1/27/98	18	All
20	**Deploy Release/Cut Over**	**11d**	**1/15/98**	**1/29/98**		
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
22	Develop Migration Plan Old to New (60-90 days) (Freeze Old Code)	1d	1/28/98	1/28/98	19	All
23	Perform Cut-Over	1d	1/28/98	1/28/98	19	All
24	Develop Post Implementation Audit Report	1d	1/29/98	1/29/98	23	All
25	**Perform Training**	**8d**	**1/20/98**	**1/29/98**		
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All
27	Develop Training Package	1d	1/21/98	1/21/98	26	All
28	Train Users	1d	1/29/98	1/29/98	23	All

To Do List by Resource as of 2/10/98

ID	Task Name	Duration	Start	Finish	Predecessors	Resources
Week of Jan 4						
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
Week of Jan 11						
4	Meet to Baseline Requirements (several mtgs)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
Week of Jan 18						
10	Analyze/Finalize Updated Requirements Doc	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code)	1d	1/20/98	1/20/98	10	All
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All
14	Perform Internal Tests (systems, integration)	1d	1/21/98	1/21/98	13, 11	All
27	Develop Training Package	1d	1/21/98	1/21/98	26	All
16	Perform Network Validation Testing (NVT)	1d	1/22/98	1/22/98	14	All
17	Perform End to End Testing	1d	1/23/98	1/23/98	16	All
Week of Jan 25						
18	Perform Stress/Volume	1d	1/26/98	1/26/98	17	All
19	Make Go/No Go Decision	1d	1/27/98	1/27/98	18	All
22	Develop Migration Plan Old to New	1d	1/28/98	1/28/98	19	All
23	Perform Cut-Over	1d	1/28/98	1/28/98	19	All
24	Develop Post Implementation Audit Report	1d	1/29/98	1/29/98	23	All
28	Train Users	1d	1/29/98	1/29/98	23	All

To Do List by Dates as of 2/10/98

ID	Task Name	Duration	Start	Finish	Predecessors	Resources
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
4	Meet to Baseline Requirements (several mtgs)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
7	Analyze Requirements Document	1d	1/14/98	1/14/98	5	BST
8	Distribute Updated Requirements Document	1d	1/15/98	1/15/98	7	BST
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
10	Analyze/Finalize Updated Requirements Doc	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code)	1d	1/20/98	1/20/98	10	All
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All

Project Team Roster

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Guideline: Use this roster format as guidance, expanding or condensing as necessary.

Project Management

PROJECT MANAGER	EMAIL	PHONE	PAGER	FAX

Sponsor/Stakeholder

PROJECT SPONSOR	EMAIL	PHONE	PAGER	FAX
STAKEHOLDER(S)	EMAIL	PHONE	PAGER	FAX

External Project Support

NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX

Project Team

NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX

High-Level Risk Assessment

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	EVALUATOR (PRINT)	SIGNATURE	DATE PREPARED

Instructions: Put a check in the column that provides the best answer. Use the attached sheets for an explanation of each item. After all items have been evaluated, provide an overall risk assessment based on the individual responses.

High-Level Risk Assessment

Risk Category	Level of Risk			
	Not Applicable	Low Risk	Moderate Risk	High Risk
Strategic importance				
Management support				
Budget availability				
Resource availability				
Project manager availability				
Time frame				
Clarity of and agreement on project objectives				
Participation in project definition				
Customer interest and involvement				
User involvement				
Technical complexity				
Technology maturity				
Relevant experience				
Supplier/contractor involvement				
Major obstacles				
OVERALL RISK				

Guidelines

Strategic Importance	Assess the strategic importance of the project. How essential is it to the planned corporate objectives or to the maintenance of current operations? The less essential the project, the greater the risk that it will not receive sufficient support and attention. ***Low Risk:*** The project has substantial strategic importance; it has either been mentioned directly as a major initiative or directly supports a major initiative. ***Moderate Risk:*** Failure to complete the project would jeopardize the achievement of major initiatives. Project sponsors would designate the project as "necessary." ***High Risk:*** The project does not directly relate to any major strategic initiatives. Project sponsors would designate the project as "nice to have."
Management Support	Determine the extent to which management throughout the company actively supports the project. Management support is essential if the project is to be effectively carried out. Management provides the resources by which the project is accomplished. ***Low Risk:*** Management in all organizations that will participate in the project actively supports the project initiative and willingly commits resources to the effort. ***Moderate Risk:*** Project sponsor provides strong support and establishes momentum among other managers who control resources. ***High Risk:*** Project sponsor is not strongly interested; no significant management attention or interest from any side.
Budget Availability	Evaluate the availability of funding to support the project. Determine whether funding will be available in the time frame necessary to carry out the work. Ensure funding is available for all resources—people, suppliers, material, computer time, and so on. ***Low Risk:*** Funding has been identified for the project, matching the time frame in which funds are required. ***Moderate Risk:*** Funding has not been identified specifically for the project; however, funding is available within established budgets and management has approved its use. ***High Risk:*** Funding has not been identified for the project, and funds are tight or unavailable within existing budgets.
Resource Availability	People are the most critical resource for the project. Evaluate the availability of human resources, assessing not only whether the required number of people are available but whether the right types of skills and experience levels are also available. ***Low Risk:*** A project team has already been identified with the requisite skills; team members have been committed to the effort. ***Moderate Risk:*** Project team members have not been identified specifically. Most skills are thought to be readily available within the company. ***High Risk:*** Project team members have not been identified. Resources are scarce, and obtaining the necessary skills will be difficult in the required time frame.
Project Manager Availability	The availability of a qualified project manager will increase the chances of project success. Assess whether a project manager is available and will be assigned to the project. ***Low Risk:*** A project manager has already been identified for the project and is available in the required time frame. ***Moderate Risk:*** A project manager has not been specifically identified, but qualified project managers are available. ***High Risk:*** No qualified project manager is available to assume responsibility for the project.

Time Frame	Assess the time frame in which the project is required. Tighter time frames increase overall project risk. There should be sufficient time to plan the project thoroughly and to accomplish all project tasks. ***Low Risk:*** There is sufficient time available for project planning and project execution, including provision for a reasonable amount of slack time to accommodate unforeseen delays. ***Moderate Risk:*** There is sufficient time for project planning and project execution, assuming an optimized schedule with an aggressive critical path. ***High Risk:*** Even with the most aggressive scheduling, the project time frame is unrealistic. Deadlines will possibly result in cutting corners to meet the schedule.
Clarity of and Agreement on Project Objectives	Assess the degree to which project objectives have been defined clearly. If the objectives are not clear, it is unlikely that the project will be carried out successfully. Also important is the extent to which the project objectives have been communicated and bought into by the company's organizational elements that will contribute to or support the project. ***Low Risk:*** Project objectives are clearly defined, have been communicated throughout relevant organizations, and have been agreed to. ***Moderate Risk:*** Project objectives have been generally defined, and there is general agreement with them. There is no detailed description of the objectives, however. ***High Risk:*** Project objectives have not been defined, or there is substantial disagreement with them among the organizations.
Participation in Project Definition	Determine whether the project has already been defined or if the project manager and project team will be allowed to participate in the project definition. Projects that are defined and handed to the project team are generally more difficult to complete than projects in which the project team participates in the project definition process. ***Low Risk:*** There is no current project definition; the project team will be a key player in the project definition process. ***Moderate Risk:*** There is a current project definition; however, the project team will have an opportunity to review and revise that definition during the planning process. ***High Risk:*** The project definition is already established; the project team will have no opportunity to revise it.
Customer Interest and Involvement	Evaluate the level of interest in the project on the part of the project's ultimate customer. Will the customer materially participate in the project's implementation? Customer interest and involvement is an important element in ensuring the project is completed as planned. ***Low Risk:*** The customer is actively interested in the project, has assigned a point of contact, and intends to participate in key project activities. ***Moderate Risk:*** The customer is interested in the project and intends to participate in some project activities. ***High Risk:*** The customer expresses little or no interest in the project and has no interest in participating in project activities.

User Involvement	Determine the extent to which users will be involved in the project. User participation can enhance the design and development processes and can streamline the project validation process. ***Low Risk:*** Users will definitely be involved with the project. A user team has been identified, and provisions have been made to provide adequate user participation. ***Moderate Risk:*** Users will likely be involved with the project; however, no specific plans have been made for their participation. ***High Risk:*** Users are unavailable to participate in the project.
Technical Complexity	The level of technical complexity is a direct contributor to overall project risk. Assess the complexity of the project with regard to the project's size, the type of system to be developed, the number of organizations that will participate, and the difficulty of the task. ***Low Risk:*** The project is technically straightforward. The system is limited to a specific application with little crossover or interface with other systems and applications. ***Moderate Risk:*** The project presents a technical challenge. The requirement is difficult to solve, or the system will perform multiple functions in concert with other systems. ***High Risk:*** The project is extremely difficult technically. There are substantial integration requirements with other systems.
Technology Maturity	Mature technology is easier to work with than emerging technology. Assess the level of maturity of the technology to be used in the system. Does the technology currently exist? Has it been proven in other applications? Will the technology be developed during the course of the project? ***Low Risk:*** Virtually all the technology to be used on the project has been used in other, proven applications. ***Moderate Risk:*** Most technology has been used in other applications. There will be some technology development during the project but that will be limited to specific functions and areas. ***High Risk:*** Most project technology will be developed during the project and must be proven during the validation and testing process.
Relevant Experience	Organizations that have experience with similar projects can complete projects with less risk than organizations doing a project for the first time. Determine whether the company has experience with projects that relate to or are similar to the contemplated project. ***Low Risk:*** The company has substantial experience with related or similar projects and can apply that experience to the current project. ***Moderate Risk:*** The company has some experience with related projects. ***High Risk:*** This is the first project of this type that the company has undertaken.
Supplier/ Contractor Involvement	Involving suppliers or contractors in the project can increase the risk, especially if the company has not worked with those organizations before. Determine the extent and anticipated difficulty of supplier involvement. ***Low Risk:*** Either few or no suppliers will be involved, or all suppliers have worked with BST on previous projects. ***Moderate Risk:*** Some suppliers will be involved; most will have worked with the company on previous projects. ***High Risk:*** Many suppliers will be involved. A significant number will not have worked with the company on previous projects.

Major Obstacles	Assess any other major obstacles that may exist. Identify the obstacles and whether it appears that they may be overcome. ***Low Risk:*** Few major obstacles exist; for those that exist, there are clear solutions. ***Moderate Risk:*** Some major obstacles exist; there are clear solutions for most of them. ***High Risk:*** A significant number of major obstacles exist for which there are no clear solutions.

Risk Event Assessment and Planning

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

RISK EVALUATOR	WBS REFERENCE	OTHER REFERENCE

Risk Event Title

ENTER ONE-LINE DESCRIPTION OF RISK EVENT

Description

PROVIDE DETAILED DESCRIPTION OF RISK EVENT

Probability

DESCRIBE THE PROBABILITY OF THE RISK EVENT OCCURRING. USE QUANTITATIVE METHODS IF APPLICABLE.

Impact

DESCRIBE THE IMPACT OF THE RISK EVENT. USE QUANTITATIVE METHODS IF APPLICABLE.

Exposure

PROVIDE AN ASSESSMENT OF THE OVERALL RISK. USE QUANTITATIVE TECHNIQUES IF POSSIBLE; OTHERWISE, USE CATEGORIZATION OF SERIOUS, THREATENING, OR MANAGABLE..

Risk Mitigation Strategies

Strategy Description	Strategy Type (Check One)			
	Avoid	Assume	Control	Transfer
ENTER A DESCRIPTION OF THE PREVENTATIVE STRATEGIES AND CONTINGENCY PLANS FOR THE RISK.				

Scope Change Request and Evaluation

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

(The following information must be filled in by the project manager)

Scope Change Request Information

CHANGE REQUEST NUMBER	DATE CHANGE REQUEST INITIATED	RESULTING CHANGE ORDER NUMBER	PROJECT LIBRARY FILE NUMBER

PRIORITY

☐ High ☐ Medium ☐ Low

General Information

SUPPLIER	CUSTOMER	CHANGE NAME (DESCRIPTION)

REFERENCES

SUBMITTED BY	DATE	INVESTIGATED BY	DATE STARTED	DATE COMPLETED

Impact Analysis

ALL PARTIES AFFECTED	INITIALS/DATE /
SCHEDULE IMPACT	INITIALS/DATE /
COST IMPACT	INITIALS/DATE /
QUALITY IMPACT	INITIALS/DATE /
PROJECT MANAGER'S RECOMMENDATION	INITIALS/DATE /

Scope Change Information

CHANGE APPROVED/REJECTED	DEFERRED TO	DATE
☐ Approved ☐ Rejected		

Approved By

CUSTOMER	DATE	BST IT	DATE

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

Scope Change Request Log

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

CUSTOMER	PROJECT LIBRARY FILE NUMBER

Log Information

Change Request Number	Priority H	Priority M	Priority L	Change Name (Description)	Assigned To	Date Opened	Date Approved	Date Closed	Cost Impact	Schedule Impact
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

Project Issues Log

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE

Log Information

Issue ID	Issue Name/Description	Severity	Assigned to	Date Open	Follow-Up Date	Date Closed	Resolution

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-37

This sheet transmits the

BellSouth Change Control Process Guide, Version 2.1
(Marked-Up CCP "Working Version")

which consists of 80 pages.

CHANGE CONTROL PROCESS

(Version 2.1 "Working Document")

CCP2_09.DOC

FEBRUARY 9, 2001

VERSION 2.1

Issued: 10/27/00 12/05/00 02/06/01

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

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VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community

			- Web Site address for Change Control Process - Notification regarding the Retirement and Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1	- Updated CCP web site address

		Section 8 Section 11	- Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1 Section 2 Section 4 Part 2 Section 5 Section 6 Section 7 Section 8 Section 11	- Added "testing" under process changes - Clarification provided in "Change Review Participants" description. - Added statement regarding submittal of Change Requests - Clarification provided for documentation changes for business rules - Step 2-Added email notification - Step 3-Removed "Cancellation by BellSouth" - Step 3-Clarification on reject reasons - Step 3-Clarification on internal validation activities - Step 4-Changed cycle time from 5 to 4 bus days for develop workaround - Added defect implementation range - Changed prioritization from "by interface" to "by category" - Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days - Modified the prioritization voting rules - Updates to the Introduction and Retirement of Interfaces - Added Type 6 escalation turnaround time - Changed 3rd Level Escalation contacts for Types 2-6 - Removed "Cancellation by BellSouth" and

		Appendix A Appendix C Appendix D All	"Defect Cancelled" definitions - Removed "Cancellation by BellSouth" from Change Request Form and Checklist - Added Letter of Intent Form - Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend. - Added BellSouth Versioning Policy Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover Section 3 Section 5 Section 10 Section 11-Terms & Definitions Appendix A All	- Removed "Interim" from cover. - Updated Type 6 definition to incorporate new defect and expedited feature definitions. - Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort. - Added Internet Web sites for EDI and TAG Testing Guidelines - Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts. - Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels. - Referenced the handling of expedites and expedite notification where appropriate.

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, including User Guides that support OSS systems currently within the scope of CCP)

- Defects/Expedites
-

The scope of the Change Control Process does not include the following which are handled through existing BellSouth processes:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- Coordination of test agreements will continue to be supported by the Account Team
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a defect Change Request should be submitted through Change Control Team.

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/
Select "Local Exchange Carriers"
Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by

third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 6- CLEC Impacting Defects

A defect is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels:

- High Impact – The failure causes impairment of critical system functions and no electronic workaround solution exists.
- Medium Impact – The failure causes impairment of critical system functions, though a workaround solution does exist.
- Low Impact – The failure causes inconvenience or annoyance.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects/expedites will be handled through the Change Control Process.

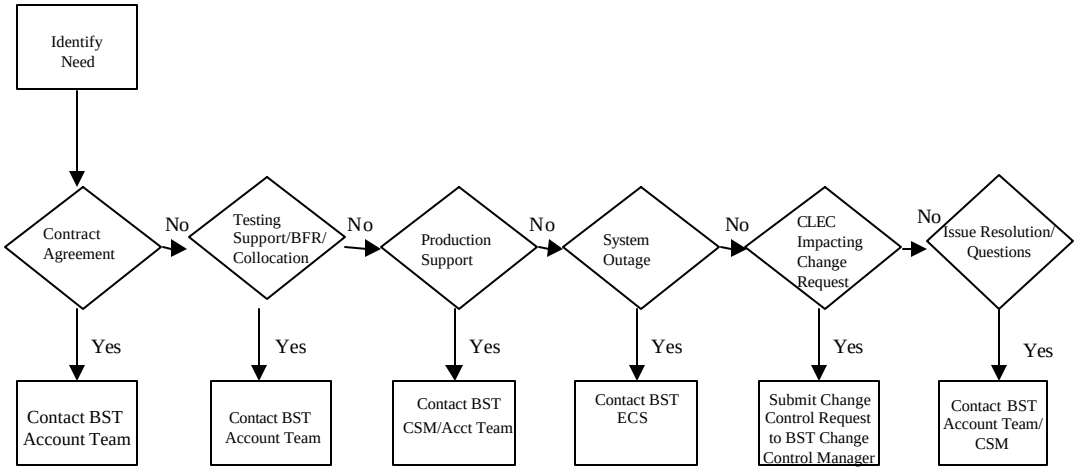


Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following two sub-sections describe the process flows for typical Type 1 through Type 5 changes. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

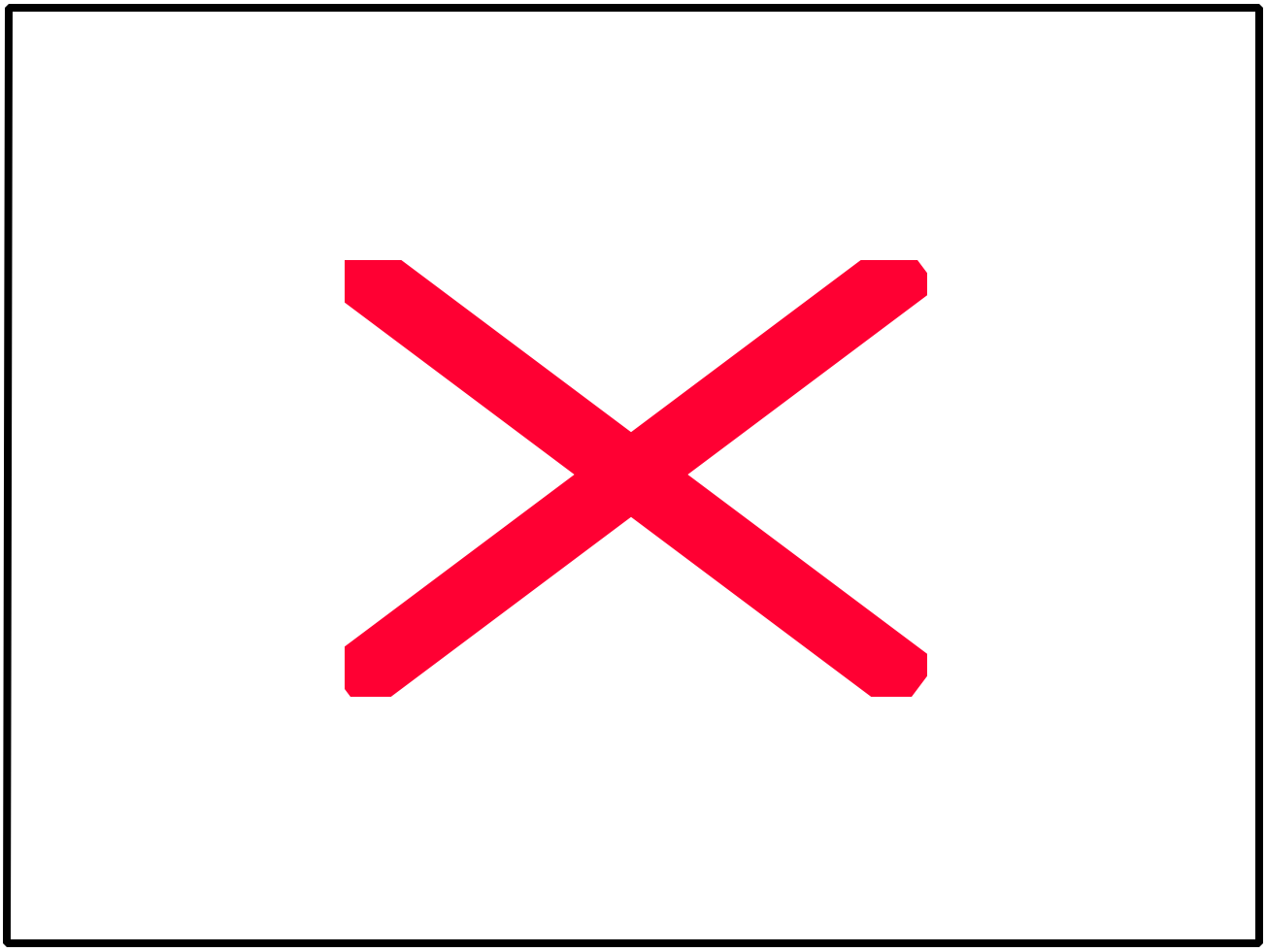


Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

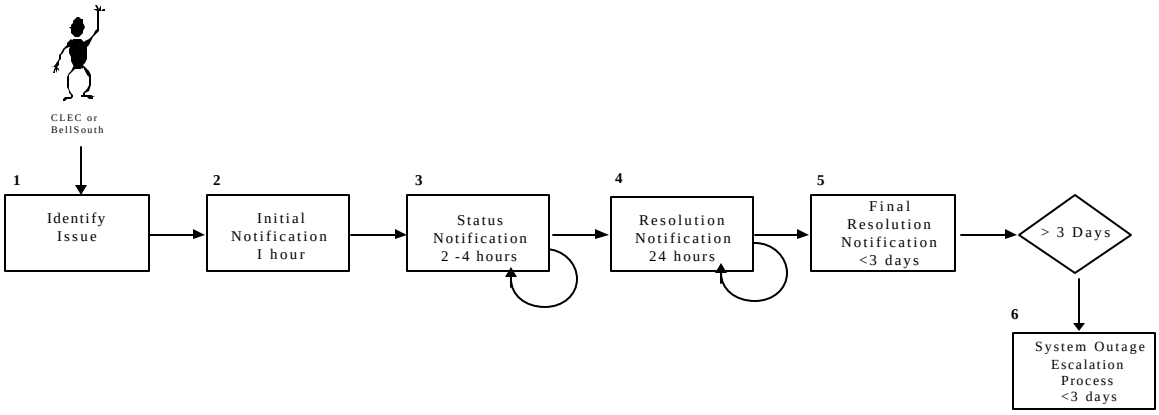


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	**1** **Identify Issue**	**2** **Initial Notification**	**3** **Status Notification**	**4** **Resolution Notification**	**5** **Final Resolution Notification**	**6** **Escalation**
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	**CCCM** **ECS**	**IDENTIFY ISSUE:** 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform intemal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the change.	**INPUTS:** • Issue Characteristics • Call to ECS Helpdesk **OUTPUTS:** • Recorded Outage	N/A
2	**ECS**	**INITIAL NOTIFICATION:** 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. The system ticket number of the outage will be included in the web posting and the email notification. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis.	**INPUTS:** • Recorded Outage **OUTPUTS:** • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and posted to the

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		web.
3	**ECS**	**STATUS NOTIFICATION: (ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	**ECS** **CCCM**	**RESOLUTION NOTIFICATION: (ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
5	ECS	**FINAL RESOLUTION NOTIFICATION:** 1. The final resolution notification is posted on the Web.	**INPUTS:** • Final Resolution Information **OUTPUTS:** • Final Resolution Notification	< 3 days
6	CCCM ECS	**ESCALATION** 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	**INPUTS:** • Information or concern relating to a Type 1 - Systems Outage **OUTPUTS:** • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

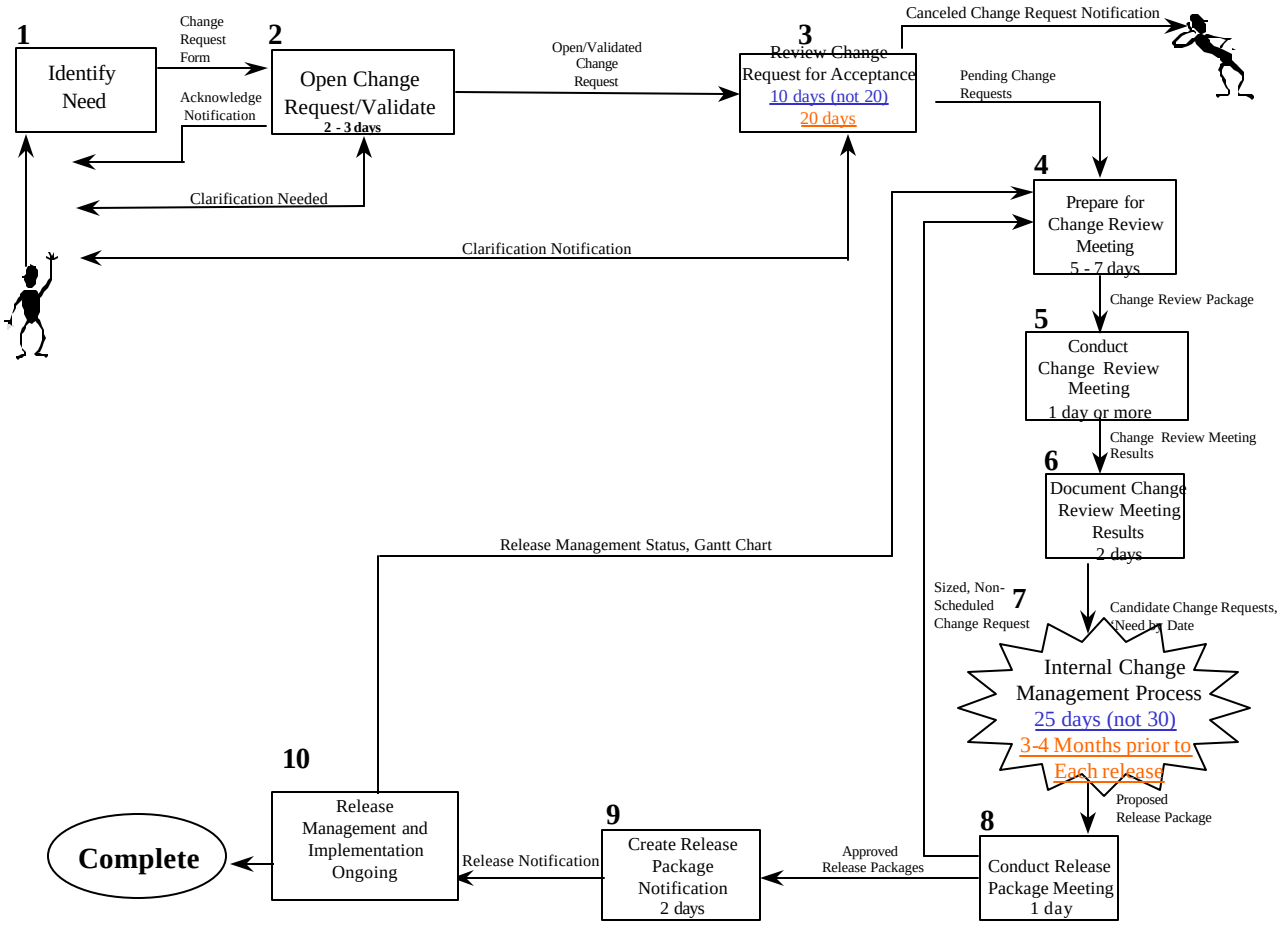


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- For the implementation of new features or modification of current functionality, final Software Release requirements and specifications will be provided 45 calendar days or more in advance of the implementation date.

- For the implementation of new features or modification of current functionality, draft requirements and specifications for software releases or systems modifications will be provided to CLECs 90 calendar days or more in advance of the implementation data.

- For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 calendar days or more in advance of the implementation date.

- All additions and changes to any BellSouth documentation changes that do not impact CLEC software, including business rule changes, will be provided to CLECs 30 calendar days or more in advance of implementation date.

- Draft user requirements for major software releases will be provided to CLECs at least 90 calendar days in advance of the release implementation date.

- Final user requirements for major software releases will be provided to CLECs at least 45 calendar days in advance of the release implementation date.

(12-7-00) CLEC community requested that for the above bullets, replace "in advance of the release implementation date" with "in advance of the CLEC test date with BST".

(1-10-01) CLEC community requested that final specifications (EDI specs and TAG API) for software releases (non-TCIF) be provided at least 45 calendar days in advance of CLEC test date with BST.

- Notification for the implementation of a new TCIF map will be provided at least 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map at least 180 calendar days in advance of the release implementation date.

(12-7-00) CLEC community requested that the notification be provided at least 240 calendar days in advance of the CLEC test date with BST. Also begin working jointly with them in the development of the User Requirements for a new TCIP map 240 calendar days in advance of CLEC test date with BST.

- Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs at least 120 calendar days in advance of the release implementation date.

(12-7-00) CLEC community requested draft user requirements for a new TCIF map be provided at least 180 calendar days in advance of CLEC test date with BST.

- Final user requirements for the implementation of a new TCIF map will be provided to CLECs at least 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts, BellSouth will distribute the user requirements at least once a month until one (1) month beyond implementation of the new TCIF map.

(12-7-00) CLEC community requested final user requirements for a new TCIF map be provided at least 120 calendar days in advance of CLEC test date with BST.

(1-10-01) CLEC community requested final specifications (EDI specs and TAG API) for a new TCIF map be provided at least 120 calendar days in advance of CLEC test date with BST.

- All additions and changes to BellSouth business rule documentation, both system and non-system impacting, will be provided to CLECs at least 30 calendar days in advance of the release implementation date.

(1-10-01) CLEC community requested all documentation changes be provided at least 30 calendar days in advance of CLEC test date with BST.

(Agree to Remove)

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	**CCCM** **BCCM**	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	**BCCM**	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).		
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. BellSouth Internal Process (Change Review Board): • A team reviews the CRs twice a week or as necessary. • A lead SME is assigned. • The lead SME researches the CR and makes a recommendation. If the recommendation is to approve the CR, then preliminary business rules are developed and presented to the Change Review Board (CRB). **NOTE**: The CRB makes the determination to accept or reject a CR. The CRB consists of product SMEs and representatives from the Electronic	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	10 Bus Days 20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Interface (EI) staff, LNP staff, Documentation staff, and Change Control. **NOTE**: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth feels that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is believed not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call and will provide a SME on that call to present its case. With input from other participating CLECs, and subsequent to BellSouth's presentation, BellSouth and the originating CLEC will determine the disposition of the request. BellSouth shall consider all possible options for accommodating the request.If BellSouth determines that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. **OBF Issues** All issues that are being actively discussed at OBF or are on the agenda to be discussed will be deferred. If the issue is not active and will not be considered within the next six (6) months, BellSouth will address the issue. If there is agreement between BellSouth and affected CLECs that an issue should be addressed prior to an OBF decision		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		BellSouth will determine if it can support the request. (Agree to Remove) (Agree to Remove) **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	**BCCM** **CCCM**	**PREPARE FOR CHANGE REVIEW MEETING** NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. **BCCM** 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request to web. 5. Provide preliminary size and scope information on each pending change request to CLECs. **CCCM** 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting. The sizing information is a preliminary estimate of the work effort. After prioritization, each interface is assessed in	**INPUTS:** • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log **OUTPUTS:** • Change Request Log • CLEC Draft Priority List • Preliminary Size and scope on each Pending change request	5-7 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		depth to determine the scope of the change request. Based on this assessment, an adjustment in the sizing may be required. **SIZING OF WORK EFFORTS**: **LARGE** • Multiple Systems Dependencies • New Functionality **MEDIUM** • Limited Systems Dependencies • New/Change Existing Functionality **SMALL** • No system dependencies • Change Existing Functionality		
5	**BCCM** **CCCM**	**CONDUCT CHANGE REVIEW MEETING** **Monthly Status Meetings** 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects/expedites) at monthly status meeting. 3. Review current Release Management statuses. 4. Review issues and action items and assign owners.(Agree to Accept) 5. Present new change requests submitted since previous Monthly Status Meeting.(Agree to Accept) **Prioritization Meetings (held quarterly in March, June, September and December)** 1. Follow Steps 1-3 from Monthly Status Meetings.	**INPUTS:** • Change Request Log • CLEC Draft Priority List • Desired/Want Dates • Impact analysis • Preliminary Size and scope on each Pending change request **OUTPUTS:** • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items (if required)	1 Bus Day (or as needed based on volume) Meeting Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		2. Initiators present Change Requests. 3. BellSouth presents size and scope of each change request and potential release package combinations. BellSouth presents the preliminary size and scope of each change request. BellSouth presents the number of major releases and dates targeted for the next 12 months. 4. Discuss Impacts. 5. Prioritize Change Requests. 6. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. 7. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 8. Review issues and action items and assign owners.		
6	**BCCM**	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	**BCCM** **CCCM**	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities (Agree to remove)to the Candidate Change Requests.(Agree to Remove) This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down	**INPUTS:** • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log **OUTPUTS:** • BellSouth's Proposed Release Package • CLEC analysis.(Agree to add)	25 Bus Days TBD

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		through the list until the capacity constraints have been reached for each future release. Sizing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached. 3. All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process. At a minimum, a target release date will be provided for the top five (5) change requests which could include the next and/or future release.		
8	**BCCM** **CCCM**	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. . Non-scheduled Change Requests will be re-ranked quarterly, along with the new pending requests, to ensure a current list of priorities is always available. This includes any of the top 5 items that may not be scheduled for the next release.Based on BST/CLEC consensus create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability. Based on CLEC/BST consensus create the Approved Release Package.	**INPUTS:** • BellSouth's Proposed Release Package • BellSouth's Release Schedule • Change Request Log • CLEC analysis (Agree to add) **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • (BellSouth cannot support) • Date for initial Release Management Project Meeting for newly established releases.(for next new release)	1 Bus Day (held ___ months prior to each major release)

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting for newly established releases.(for the next new release) 8. All Change Requests that are in the approved scheduled release (s)(Remove) will be changed to "S" status for "Scheduled".		
9	**BCCM**	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package (s)(Remove) **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	**BCCM** **(Project Managers from each participating company)**	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth User Requirements for software changes(Agree to accept) will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. • For new features or changes to existing functionality, draft Specifications and Requirements will be provided NLT 90 days in advance of	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Draft Specifications and Requirements • Final Specifications and Requirements • Documentation Changes • Implemented Change Request • Draft User Requirements • Final User Requirements • Documentation Changes	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Implementation. (12-7-00) at least 90 days in advance of CLEC Test Date with BST. • Draft User Requirements for major software release will be provided to the CLECs at least 90 calendar days in advance of the release implementation date. • For new features or changes to existing functionality, final Specifications and Requirements will be provided NLT 45 days in advance of Implementation. (12-7-00) At least 45 days in advance of CLEC test date with BST. • Final User Requirements for major software releases will be provided to the CLECs at least 45 days in advance of the release implementation date. (12-7-00) Final specifications (EDI Specs and TAG API) for software releases will be provided to the CLECs at least 45 days in advance of CLEC test date with BST. • Final specifications (EDI Specs and TAG API) for major software releases will be provided to the CLECs at least ___ days in advance of release implementation date. • For the implementation of a new software version, final requirements and specifications		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		will be provided to CLECs 180 days or more in advance of the implementation date. (12-7-00) Notification for the implementation of a new TCIF will be provided at least 240 calendar days in advance of the CLEC Test Date with BST. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map at least 240 calendar days in advance of the CLEC test date with BST. • Notification for the implementation of a new TCIF map will be provided at least 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map NLT 180 calendar days in advance of the release implementation date. (12-7-00) Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs at least 180 calendar days in advance of the CLEC test date with BST. • Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs at least 120 calendar days in advance of the release implementation date. (12-7-00) Final user requirements and specifications (EDI Specs and TAG API) for the implementation of a new TCIF map will		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		be provided to CLECs at least 120 calendar days in advance of the CLEC test date with BST. • Final User Requirements for the implementation of a new TCIF map will be provided to CLECs at least 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts, BellSouth will distribute the user requirements at least once a month until one (1) month beyond the implementation of the new TCIF map. 4. BellSouth Documentation changes, including business rule changes will be provided.(Agree to add) • All such changes will be provided NLT 30 days in advance of Implementation. (12-7-00) provide at least 30 calendar days in advance of CLEC test date with BST. • All additions and changes to BellSouth business rule documentation, both non-system and system impacting, will be provided to CLECs at least 30 calendar days in advance of the release implementation date. 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.		

PART 3 – EXPEDITED FEATURE PROCESS

An Expedited Feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories:

- A defect that has been re-classified as a feature where the CLEC/BellSoth has determined should be expedited due to impact
- An enhancement to an existing product or service where the CLEC/BellSouth has determined should be expedited due to impact

Re-classified Defects

When a defect is re-classifed as a feature, the CLEC/BellSouth will be notified by Change Control in the defect validation. The CLEC will have the ability to ask BellSouth to expedite the reclassified feature by updating the Change request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 Expedited feature process using agreed upon intervals.

Enhancement to an existing product or service

A CLEC/BellSouth will also have the ability to submit a Type 2-5 change request as an expedited feature request for an enhancement to an existing product or service where the functionality does not currently exist in BellSouth's offered products and services.

For both re-classified defects and enhancements to an existing product or service, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the Expedited Feature process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 that are eliminated.
- CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

Figure 4.4 provides the process flow for the expedited feature process.

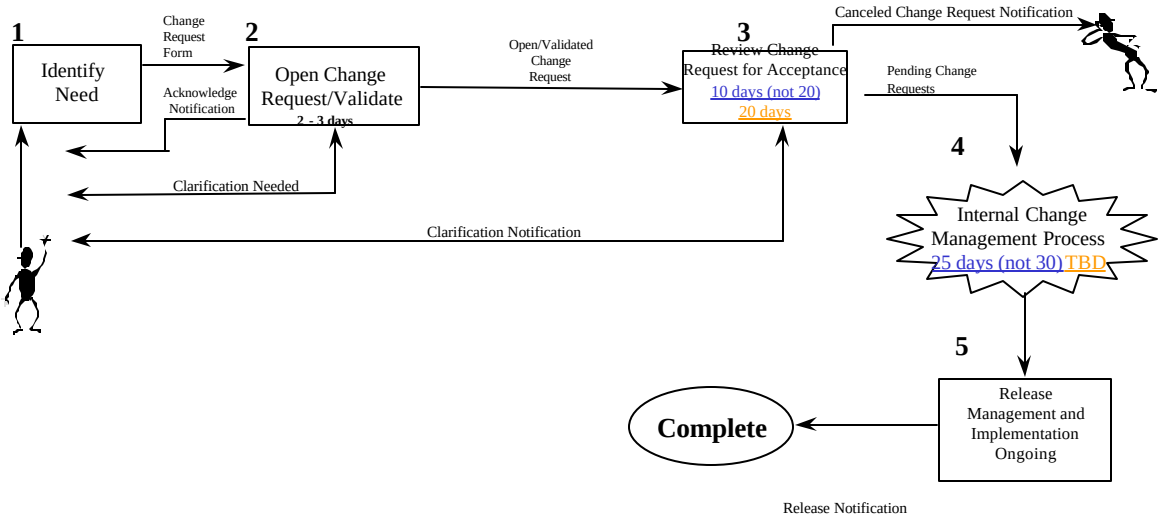


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the expedited feature process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and Attachment A-1A, Item 22. 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	1 Bus Day Clarification times would be in addition to cycle time.
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		information for content. 2. Change Request reviewed for impacted area (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C" for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. • If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow, Step 4. **NOTE**: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth determines that a CLEC initiated expedited change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming	required) **OUTPUTS:** • Validated Expedited Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Monthly Status Meeting.		
4	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	**INPUTS:** • Change Request Log **OUTPUTS:** • Release Date for Expedited Feature	25 (Still under discussion)
5	BCCM **(Project Managers from each participating company)**	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth User Requirements for software changes will be presented to CLECs, if applicable. If needed, changes will be incorporated and requirements re-baselined. 4. BellSouth Documentation changes, including business rules changes will be provided. 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Documentation Changes	Ongoing

5.0 DEFECT PROCESS

A CLEC/BST identified defect will enter this process through the Change Management Team as a Type 6 Change Request. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three Impact Levels:

- **High Impact**

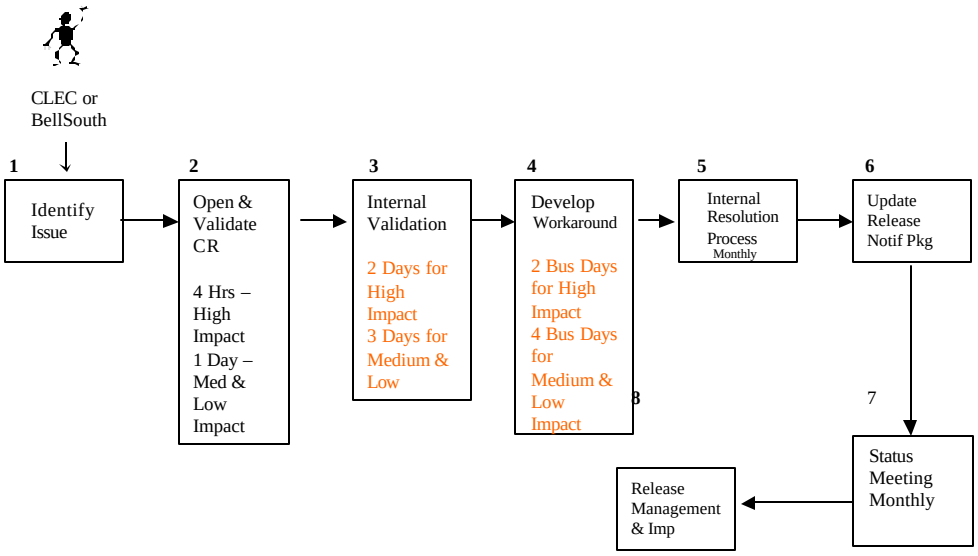
  The failure causes impairment of critical system functions and no electronic workaround solution exists.**Medium Impact**

  The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

  The failure causes inconvenience or annoyance.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defects.



NOTE: The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Identify Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments must include the following, if appropriate: • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 5. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 6 Change Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE DEFECT/EXPEDITE FORM FOR COMPLETENESS** 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect) 4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist. 5. Verify specifications and related information exists.	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:** • New Defect/Expedite • Acknowledgment Notification • Clarification Notification (if required)	4 Hours for High Impact 1 Bus Day for Medium and Low Impact (Time to be calculated from time of receipt with a cutoff time of

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		6. Send Clarification Notification via email to the originator if needed. 7. Update CR status to "PC" for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.		4:00 PM Eastern Time)
3	**BCCM**	**INTERNAL VALIDATION** 1. Validate that it is a defect/expedite. 2. Perform internal defect/expedite analysis. 3. Determine status of request: • If change already exists or CLEC training issue. • If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to 'C'. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect/Expedite and indicate appropriate Impact Level. • If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. • If the process is operating as specified in the baselined requirements and published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s).	**INPUTS:** • New Defect/Expedite **OUTPUTS:** • Validated Defect/Expedite • Defect/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required) • Status provided for High Impact Defects to originator via email within 24 hours.	1 Bus Day for High Impact 2 Bus Days for High Impact 3 Bus Days Medium and Low Impact

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		• If issue is re-classified as a standard feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3). **NOTE**: See Section 9.0 Terms and Definitions – Defect Status for valid status codes and descriptions. Defect notification will be provided to CLEC community via e-mail and web posting.		
4	**BCCM**	**DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)** 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via email and web posting. **4.** If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.	**INPUTS:** • Validated Defect • Clarification Notification (if required) **OUTPUTS:** • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • E-mail and web posting of workaround	1 Bus Day for High and Medium Impact 2 Bus Days for High Impact 4 Bus Days for Low Impact 4 Bus Days for Medium and Low Impact
5	**BCCM**	**INTERNAL RESOLUTION PROCESS** 1. Schedule and evaluate Defects based on capacity and business impacts to the CLECs and BellSouth. 2. Provide status updates to the CLEC community via email as the status changes until the defect is implemented.	**INPUTS:** • CLEC/ BST input **OUTPUTS:** • Defect Release Schedule	Validated High and Medium Impact defects will be implemented within a 4 – 10 business day range, best effort.

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
				Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium Impact Defects will be implemented within 90 days. Low Impact defects will be implemented best effort. Low Impact defects will be implemented within a 4 – 20 business day range, best effort. (REMOVE)
6	BCCM	**UPDATE RELEASE PACKAGE NOTIFICATION** 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". **Note**: The release notification will be published in a timely manner, based on the release constraints associated with the defect/expedite.	**INPUTS:** • Defect Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for defects (may be less than 30 days).
7	BCCM	**MONTHLY STATUS MEETING**	**INPUTS:** • Defects Received	Monthly or when status

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		1. Provide status of Defect 2. Solicit CLEC/BellSouth input 3. Update Defect information as needed.	• Change Request Log • Defect Analysis • Workaround (if applicable) **OUTPUTS:** • Updated status • Updated Change Request Log • Meeting minutes	changes, whichever occurs first.
8	**BCCM**	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 6 changes: 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 2. Once a defect is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT AND APPROVAL

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order/order, maintenance, manual and documentation, etc.). Prioritization meetings will be held quarterly.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's estimate of the size and scope of each Change Request.
- Schedule of releases and capacity in each (BellSouth cannot support providing capacity information)

- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish "desired/want" dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- CLECs may choose to vote "no" on change requests that may potentially negatively impact its business. If a majority of CLECs vote "no" on any certain change request, that request will not be implemented. BellSouth accepts the above with the addition of the following language: "Deviations may be required due to business requirements".
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and documentation changes will be prioritized separately; however they will need to be synchronized with the electronic interface changes.
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

Part 4 – Developing and Approving Release Packages

Subsequent to the Change Review Meeting BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held 25 business days later.

Subsequent to the Change Review Meeting, BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held ____ (TBD).

- Sizing and sequencing of change requests will be accomplished at the Prioritization Meeting. CLECs may take into account the size and scope when prioritizing items.
- BellSouth will develop several variations of release packages to include all of the prioritized requests.
- All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.

At a minimum, a target release date will be provided for the top five (5) change requests, which could include the next and/or future releases.

During the Release Package Meeting BST will present its proposed release packages. BST and CLECs will then vote on the release package or combination of release packages to be implemented. BST/CLEC consensus will be used to create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability.

During the Release Package Meeting, BellSouth will present its proposed release package for the next release, along with target dates for the top five (5) change requests. CLEC/BST consensus will be used to create the Approved Release Package.

Change Requests may not be implemented in priority order due to the complexity of the Change Request, the relationship between the implementation of one change and changes specified in other Change Requests, and other factors. Implementation decisions will remain with BellSouth's discretion, consistent with applicable law and regulatory authority and resource constraints. BellSouth will consider the prioritization in exercising this discretion.

8.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth Originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as possible. When a new interface request is submitted, BellSouth will present information on the new interface and hold an open discussion at the next monthly status meeting. BellSouth will provide specifications on the interface being developed to the CLEC Community using the timeframes established in Part 4, Section 2. As new interfaces are deployed, they will be added to the scope of this document and requested changes will be managed by this process.

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC community. As new interfaces are deployed, they will be added to the scope of this document, as appropriate, based on the use by the CLEC and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs by submitting a Type 4 change request(Remove) through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Retirement of Versions

When software versions are retired, BellSouth will give the CLECs a 120 day notification.

A CLEC may respond to Change Control with its desire to extend a retirement date. The CLEC must explain why the scheduled retirement date is not acceptable by providing the impact to its business.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.(Excludes Expedites)
- For Type 6 High and Medium Impact(See next bullet) issues, the escalation process is agreed to allow BellSouth a one-day turnaround to provide a status for each cycle of escalation.
- For Type 6 High Impact issues, the escalation process is agreed to allow BellSouth a two (2) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a five (5) day turnaround to provide a status for each cycle of escalation.
- For Type 6 Low Impact and Type 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three-day turnaround to provide a status for each cycle of escalation.(See next bullet)
- For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.

- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Contro e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Don Tighe Manager - EC Support Group Interconnection Operations	404-532-2233	1-800-946-4646 PIN 1440050	Don.Tighe@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
  - Definition and escalation of item.
  - History of item.
  - Reason for escalation.
  - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day

of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Types 2-5 Changes: Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6, High and Medium Impact Changes: Within 1 business day of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 6 High Impact Changes: Within 2 business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Type 6 Medium and Low Impact Changes: Within five (5) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6 Low Impact and Type 2-5 Expedite Changes: Within 3 business days of receipt (2 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 4-5 Expedite Changes: Within three (3) business days of receipt (2 from acknowledgment), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	**Valerie Cottingham** **Sales Director Change Control Process**	**205-321-2168**	Valerie.cottingham@bridge.bellsouth.com
2nd Level	**Terrie Hudson Director (for Systems Issues)** **Joy Lofton Director (for Business Rules/Operations Issues)**	**770-936-3740** **404-927-7828**	Terrie.Hudson@bridge.bellsouth.com Joy.A.Lofton@bridge.bellsouth.com
3rd Level	**Doug McDougal Senior Director (for Systems Issues)** **Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)**	**404-927-7505** **404-927-3545**	Doug.McDougal@bridge.bellsouth.com Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including escalation within each company to the person with ultimate authority for Change Control operations, and the services of a Joint Investigative Team when appropriate, BellSouth and the impacted CLEC(s) agree as follows:

Either party to the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, both parties shall participate in good faith.

- Either party may file a formal complaint with the State PSC, requesting resolution of the issue, without necessity for prior mediation.

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.

- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. Following this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution. The official ballot will detail the change being requested, and the significant arguments presented for and against the change during the review. The ballot will be distributed one week following the Status Meeting. CLEC's and BellSouth will have one week in which to cast their vote. Only ballots transmitted before midnight of the due date will be counted. Implementation of such changes will require a two-thirds affirmative vote for approval. .

To be discussed at the February 21, 2001 meeting.

10.0 TESTING ENVIRONMENT

Requests related to the processes of testing an interfaces will be included in the Change Control Process. Changes to BellSouth's testing environments and supporting processes will be submitted through the Change Control Process as a Type 4 or Type 5 request. The requests will follow the guidelines and intervals set forth in the Type 2-5 process flow.

ellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier TestingBellSouth will also provide a pre-release testing environment for TAG and EDI that will be available to CLEC's 30 days **prior** to the implementation of any new releases. This environment will be a wholly separate, non-production environment for all preordering and ordering interfaces and will mirror the production environment.

NOTE: CLECs/BST agreed to re-evaluate this section after the CLEC Test Environment is implemented in 1st Qtr. 2001.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, refer to the following BellSouth public Internet sites:

EDI

www.interconnection.bellsouth.com/markets/lec.html
Select "Customer Guides"
Select "Local Exchange Ordering Guides"

Select "BellSouth EDI Specifications – TCIF 9"
Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html
Select "OSS Information Center"
Select "TAG Documentation"

This site is password protected. You should obtain the password from your Account Team representative.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing Change Requests and defects/expedites.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
  - ◊ Dependencies relative to other data elements
  - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: BST cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects/expedites or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as

the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- Type 2-5 – Expedited Feature Change. The inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) A defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) An enhancement to an existing product or service where the CLEC/BellSouth has determined should be expedited due to impact.
- Type 6 – CLEC Impacting Defect. A defect is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business requirements and business rules match; this will be addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. The CLEC and/or BellSouth may initiate defect changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):

- **CC = Clarification.** Requested clarification not received in allotted time (7 days).
- **CD = Duplicate Request.** A request for this change already exists.

- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).
- **D =** Request Purge. Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled**. Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business requirements and business rules match; this will e addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Status. The status of a CLEC Impacting Defect Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
  - **CD = Duplicate Request.** A request for this change already exists.
  - **CT = Training.** Requested change already exists, or CLEC training issue.

- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect/Expedite.** Indicates internal analysis has been conducted and it is determined that it is a validated defect (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Expedited Feature. An expedited feature is the inability for CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a defect that has been re-classified as a feature where the CLEC has determined should be expedited due to impact and 2) an enhancement to an existing product or service where the CLEC has determined should be expedited due to impact.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect and/or Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of “point releases” (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final “point release” of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-38

This sheet transmits the

Percent Flow-Through Service Requests Report

which consists of 37 pages.

.RING

REPORT: PERCENT FLOW T GH SERVICE REQUESTS (SUMMARY)
REPORT PE. D: 10/01/00 - 10/31/00

		ADJUSTED FLOW-THROUGH %
CLEC AGGREGATE		
REGION ALL SERVICES		88.96%
		FLOW-THROUGH %
BST AGGREGATE		
REGION		
- RETAIL RESIDENCE		95.20%
- RETAIL BUSINESS **		0 **

Note **: According to the FCC's ordering flow-through definition in the Louisiana II Order, stating that orders must be transmitted electronically through the gateway without manual intervention, BellSouth has uncovered that BST retail business orders have no mechanized service order generation and therefore do not fall within the FCC's flow-through definition. Therefore, the appropriate BST business retail flow-through is really 0.

REPORT: PERCENT FLOW UGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#1		2	0	0	13	13	0	6	0	7	7	3	4	0	0.00%	0.00%
#2		35	1205	0	0	1205	62	97	7	1039	316	302	14	723	69.59%	70.54%
#3		0	2	0	0	2	0	0	0	2	1	1	0	1	50.00%	50.00%
#4		12	41	0	0	41	3	5	0	33	9	4	5	24	72.73%	85.71%
#5		1	64	0	0	64	4	7	2	51	12	9	3	39	76.47%	81.25%
#6		17	1084	0	0	1084	54	84	20	926	333	309	24	593	64.04%	65.74%
#7		0	7	0	0	7	0	2	1	4	3	3	0	1	25.00%	25.00%
#8		1	12	0	0	12	2	7	0	3	1	1	0	2	66.67%	66.67%
#9		2	12	0	0	12	5	0	0	7	1	1	0	6	85.71%	85.71%
#10		30	3673	0	0	3673	252	266	25	3130	500	440	60	2630	84.03%	85.67%
#11		29	825	0	0	825	240	85	20	480	214	183	31	266	55.42%	59.24%
#12		3	305	0	0	305	9	12	0	284	17	14	3	267	94.01%	95.02%
#13		41	0	0	148	148	4	51	0	93	40	25	15	53	56.99%	67.95%
#14		41	416	0	0	416	49	35	12	320	53	49	4	267	83.44%	84.49%
#15		7	76	0	0	76	8	11	5	52	20	19	1	32	61.54%	62.75%
#16		12	225	0	0	225	30	39	0	156	72	13	59	84	53.85%	86.60%
#17		10	0	146	0	146	70	26	23	27	11	7	4	16	59.26%	69.57%
#18		10	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#19		38	1063	0	0	1063	89	223	12	739	103	64	39	636	86.06%	90.86%
#20		16	434	0	0	434	16	50	2	366	38	34	4	328	89.62%	90.61%
#21		1	17	0	0	17	1	2	0	14	0	0	0	14	100.00%	100.00%
#22		2	614	0	0	614	19	24	3	568	16	13	3	552	97.18%	97.70%
#23		33	0	1	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#24		33	2702	0	0	2702	104	201	15	2382	136	106	30	2246	94.29%	95.49%
#25		7	18	0	0	18	8	0	0	10	0	0	0	10	100.00%	100.00%
#26		30	341	0	0	341	39	53	9	240	62	54	8	178	74.17%	76.72%
#27		3	126	0	0	126	9	17	0	100	9	7	2	91	91.00%	92.86%
#28		2	21	0	0	21	0	3	0	18	5	4	1	13	72.22%	76.47%
#29		5	61	0	0	61	0	2	0	59	4	3	1	55	93.22%	94.83%
#30		4	863	0	0	863	19	43	0	801	25	20	5	776	96.88%	97.49%
#31		0	66	0	0	66	1	13	0	52	7	7	0	45	86.54%	86.54%
#32		0	0	0	1	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#33		7	255	0	0	255	50	18	7	180	64	54	10	116	64.44%	68.24%
#34		10	192	0	0	192	7	12	1	172	7	4	3	165	95.93%	97.63%
#35		19	638	0	0	638	62	86	3	487	33	31	2	454	93.22%	93.61%
#36		0	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#37		0	228	0	0	228	10	18	3	197	13	13	0	184	93.40%	93.40%
#38		0	4	0	0	4	0	0	1	3	2	2	0	1	33.33%	33.33%
#39		65	18742	0	0	18742	1236	1804	149	15553	966	676	290	14587	93.79%	95.57%
#40		0	76	0	0	76	7	8	0	61	15	14	1	46	75.41%	76.67%

REPORT: PERCENT FLOW JGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#41		6	123	0	0	123	27	11	2	83	43	32	11	40	48.19%	55.56%
#42		0	24	0	0	24	0	1	0	23	0	0	0	23	100.00%	100.00%
#43		9	164	0	0	164	4	24	0	136	18	16	2	118	86.76%	88.06%
#44		0	10	0	0	10	2	4	0	4	1	1	0	3	75.00%	75.00%
#45		9	0	0	2	2	1	0	0	1	1	1	0	0	0.00%	0.00%
#46		9	0	186	0	186	128	24	22	12	8	8	0	4	33.33%	33.33%
#47		2	21	0	0	21	2	0	0	19	10	9	1	9	47.37%	50.00%
#48		1	85	0	0	85	11	8	0	66	8	4	4	58	87.88%	93.55%
#49		42	0	212	0	212	163	22	11	16	11	8	3	5	31.25%	38.46%
#50		368	0	0	325	325	179	35	14	97	32	28	4	65	67.01%	69.89%
#51		368	4939	0	0	4939	1280	634	128	2897	1137	1026	111	1760	60.75%	63.17%
#52		0	3	0	0	3	1	0	0	2	1	1	0	1	50.00%	50.00%
#53		0	42	0	0	42	12	7	0	23	17	17	0	6	26.09%	26.09%
#54		30	0	0	5115	5115	78	480	0	4557	82	43	39	4475	98.20%	99.05%
#55		30	74	0	0	74	2	15	0	57	0	0	0	57	100.00%	100.00%
#56		20	0	0	330	330	12	29	11	278	15	9	6	263	94.60%	96.69%
#57		20	10	0	0	10	0	1	0	9	0	0	0	9	100.00%	100.00%
#58		10	75	0	0	75	13	6	0	56	22	16	6	34	60.71%	68.00%
#59		19	325	0	0	325	12	12	4	297	14	12	2	283	95.29%	95.93%
#60		8	29	0	0	29	0	7	6	16	11	4	7	5	31.25%	55.56%
#61		1	42	0	0	42	4	4	2	32	6	4	2	26	81.25%	86.67%
#62		0	370	0	0	370	44	34	2	290	23	22	1	267	92.07%	92.39%
#63		0	139	0	0	139	17	10	3	109	40	37	3	69	63.30%	65.09%
#64		14	939	0	0	939	34	51	5	849	61	52	9	788	92.82%	93.81%
#65		36	0	464	0	464	343	35	42	44	33	24	9	11	25.00%	31.43%
#66		36	18	0	0	18	8	2	1	7	6	4	2	1	14.29%	20.00%
#67		0	6	0	0	6	3	1	0	2	1	0	1	1	50.00%	100.00%
#68		1	28	0	0	28	27	0	0	1	1	1	0	0	0.00%	0.00%
#69		4	1317	0	0	1317	32	90	15	1180	58	46	12	1122	95.08%	96.06%
#70		0	4	0	0	4	1	0	0	3	0	0	0	3	100.00%	100.00%
#71		65	0	0	1033	1033	27	106	0	900	79	35	44	821	91.22%	95.91%
#72		65	305	0	0	305	62	42	8	193	25	14	11	168	87.05%	92.31%
#73		1	33	0	0	33	18	3	0	12	4	3	1	8	66.67%	72.73%
#74		120	0	0	1	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#75		120	0	1084	0	1084	166	154	2	762	111	68	43	651	85.43%	90.54%
#76		120	5103	0	0	5103	366	428	85	4224	511	386	125	3713	87.90%	90.58%
#77		86	0	0	2266	2266	94	214	17	1941	78	51	27	1863	95.98%	97.34%
#78		86	110	0	0	110	28	12	3	67	11	6	5	56	83.58%	90.32%
#79		3	337	0	0	337	28	15	2	292	31	25	6	261	89.38%	91.26%
#80		34	1856	0	0	1856	223	208	19	1406	233	216	17	1173	83.43%	84.45%

REPORT: PERCENT FLOW UGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#81		0	152	0	0	152	3	7	0	142	4	3	1	138	97.18%	97.87%
#82		2	6	0	0	6	0	0	0	6	2	2	0	4	66.67%	66.67%
#83		0	32	0	0	32	3	5	2	22	6	6	0	16	72.73%	72.73%
#84		5	205	0	0	205	26	6	7	166	41	35	6	125	75.30%	78.13%
#85		108	0	0	2847	2847	57	278	46	2466	89	39	50	2377	96.39%	98.39%
#86		108	625	0	0	625	32	80	22	491	79	42	37	412	83.91%	90.75%
#87		0	0	0	2	2	1	1	0	0	0	0	0	0	0.00%	0.00%
#88		23	405	0	0	405	19	39	1	346	21	16	5	325	93.93%	95.31%
#89		11	621	0	0	621	36	50	3	532	81	38	43	451	84.77%	92.23%
#90		1	21	0	0	21	11	3	0	7	2	2	0	5	71.43%	71.43%
#91		74	0	6	0	6	4	0	0	2	0	0	0	2	100.00%	100.00%
#92		74	1124	0	0	1124	204	141	23	756	315	253	62	441	58.33%	63.54%
#93		50	0	245	0	245	109	53	44	39	23	19	4	16	41.03%	45.71%
#94		3	119	0	0	119	36	11	0	72	27	21	6	45	62.50%	68.18%
#95		12	568	0	0	568	33	88	28	419	137	117	20	282	67.30%	70.68%
#96		376	0	0	9023	9023	203	773	115	7932	156	96	60	7776	98.03%	98.78%
#97		376	3610	0	0	3610	344	368	76	2822	356	280	76	2466	87.38%	89.80%
#98		11	340	0	0	340	47	64	4	225	78	54	24	147	65.33%	73.13%
#99		68	0	2111	0	2111	1052	174	167	718	272	133	139	446	62.12%	77.03%
#100		68	161	0	0	161	23	12	1	125	39	34	5	86	68.80%	71.67%
#101		14	253	0	0	253	62	25	5	161	32	27	5	129	80.12%	82.69%
#102		16	0	964	0	964	261	60	0	643	2	1	1	641	99.69%	99.84%
#103		7	1061	0	0	1061	10	52	9	990	29	21	8	961	97.07%	97.86%
#104		0	0	102	0	102	2	16	2	82	5	2	3	77	93.90%	97.47%
#105		0	226	0	0	226	4	12	0	210	8	7	1	202	96.19%	96.65%
#106		0	14	0	0	14	1	1	4	8	8	7	1	0	0.00%	0.00%
#107		448	0	0	3089	3089	221	324	61	2483	219	158	61	2264	91.18%	93.48%
#108		448	38575	0	0	38575	938	2866	208	34563	1857	648	1209	32706	94.63%	98.06%
#109		41	0	0	1	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#110		41	4455	0	0	4455	270	329	65	3791	187	157	30	3604	95.07%	95.83%
#111		3	775	0	0	775	100	161	2	512	111	92	19	401	78.32%	81.34%
#112		0	46	0	0	46	3	5	0	38	7	5	2	31	81.58%	86.11%
#113		0	6	0	0	6	5	0	0	1	0	0	0	1	100.00%	100.00%
#114		0	28	0	0	28	4	3	0	21	11	5	6	10	47.62%	66.67%
#115		4	0	0	158	158	3	15	1	139	16	7	9	123	88.49%	94.62%
#116		4	363	0	0	363	9	24	3	327	34	23	11	293	89.60%	92.72%
#117		4	92	0	0	92	38	10	1	43	19	11	8	24	55.81%	68.57%
#118		3	19	0	0	19	3	4	0	12	3	2	1	9	75.00%	81.82%
#119		11	1184	0	0	1184	81	154	1	948	49	32	17	899	94.83%	96.56%
#120		15	140	0	0	140	0	33	7	100	63	26	37	37	37.00%	58.73%

REPORT: PERCENT FLOW UGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#121		172	0	3340	0	3340	38	767	60	2475	1327	1170	157	1148	46.38%	49.53%
#122		0	13	0	0	13	2	0	0	11	7	4	3	4	36.36%	50.00%
#123		5	359	0	0	359	62	30	2	265	105	93	12	160	60.38%	63.24%
#124		5	474	0	0	474	90	23	8	353	104	90	14	249	70.54%	73.45%
#125		0	0	0	1	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#126		1	3	0	0	3	2	0	0	1	1	1	0	0	0.00%	0.00%
#127		44	0	0	651	651	47	106	19	479	263	153	110	216	45.09%	58.54%
#128		44	16	0	0	16	3	0	0	13	1	1	0	12	92.31%	92.31%
#129		116	0	0	718	718	338	113	13	254	97	63	34	157	61.81%	71.36%
#130		116	1052	0	0	1052	158	162	26	706	401	340	61	305	43.20%	47.29%
#131		124	0	0	20495	20495	301	2208	0	17986	341	214	127	17645	98.10%	98.80%
#132		124	235	0	0	235	2	24	0	209	7	6	1	202	96.65%	97.12%
#133		0	3	0	0	3	0	0	0	3	1	1	0	2	66.67%	66.67%
#134		80	0	0	15277	15277	196	1611	0	13470	902	247	655	12568	93.30%	98.07%
#135		80	294	0	0	294	1	69	1	223	9	5	4	214	95.96%	97.72%
#136		8	0	4	0	4	2	0	0	2	1	0	1	1	50.00%	100.00%
#137		8	91	0	0	91	8	6	0	77	3	1	2	74	96.10%	98.67%
#138		10	0	0	11	11	5	2	1	3	3	2	1	0	0.00%	0.00%
#139		0	7	0	0	7	1	4	0	2	2	2	0	0	0.00%	0.00%
#140		21	0	313	0	313	191	45	23	54	12	6	6	42	77.78%	87.50%
#141		21	74	0	0	74	39	11	0	24	11	6	5	13	54.17%	68.42%
#142		4	4	0	0	4	0	0	1	3	2	2	0	1	33.33%	33.33%
#143		0	0	0	2	2	1	0	0	1	1	0	1	0	0.00%	0.00%
#144		0	20	0	0	20	4	2	0	14	1	1	0	13	92.86%	92.86%
#145		25	0	104	0	104	26	25	6	47	46	6	40	1	2.13%	14.29%
#146		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#147		0	3	0	0	3	2	0	0	1	0	0	0	1	100.00%	100.00%
#148		0	5	0	0	5	2	1	0	2	1	0	1	1	50.00%	100.00%
#149		0	0	0	1	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#150		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#151		0	0	0	6	6	0	4	1	1	1	1	0	0	0.00%	0.00%
#152		0	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#153		0	0	0	3	3	3	0	0	0	0	0	0	0	0.00%	0.00%
#154		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#155		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#156		18	0	0	319	319	60	59	1	199	65	51	14	134	67.34%	72.43%
#157		18	24	0	0	24	5	0	0	19	3	1	2	16	84.21%	94.12%
#158		289	0	2624	0	2624	8	782	33	1801	1122	941	181	679	37.70%	41.91%
#159		4	0	0	18	18	1	8	1	8	4	3	1	4	50.00%	57.14%
#160		2	0	0	11	11	3	0	0	8	6	2	4	2	25.00%	50.00%

REPORT: PERCENT FLOW UGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#161		2	134	0	0	134	14	8	1	111	91	56	35	20	18.02%	26.32%
#162		113	0	174	0	174	139	9	0	26	17	14	3	9	34.62%	39.13%
#163		113	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#164		22	3294	0	0	3294	159	245	12	2878	117	106	11	2761	95.93%	96.30%
#165		10	660	0	0	660	128	28	21	483	213	188	25	270	55.90%	58.95%
#166		1	88	0	0	88	6	5	0	77	2	1	1	75	97.40%	98.68%
#167		10	457	0	0	457	24	3	6	424	31	28	3	393	92.69%	93.35%
#168		0	17	0	0	17	3	1	0	13	3	3	0	10	76.92%	76.92%
#169		9	0	0	78	78	49	10	2	17	7	2	5	10	58.82%	83.33%
#170		9	210	0	0	210	27	29	10	144	67	55	12	77	53.47%	58.33%
#171		8	116	0	0	116	11	13	1	91	18	15	3	73	80.22%	82.95%
#172		23	0	0	2	2	2	0	0	0	0	0	0	0	0.00%	0.00%
#173		23	379	0	0	379	77	49	4	249	87	68	19	162	65.06%	70.43%
#174		0	28	0	0	28	1	0	0	27	0	0	0	27	100.00%	100.00%
#175		3	402	0	0	402	41	34	7	320	39	30	9	281	87.81%	90.35%
#176		0	3	0	0	3	0	0	0	3	1	1	0	2	66.67%	66.67%
#177		342	7104	0	0	7104	1027	1663	99	4315	1599	1304	295	2716	62.94%	67.56%
#178		0	146	0	0	146	20	4	0	122	6	5	1	116	95.08%	95.87%
#179		69	0	0	2236	2236	39	206	52	1939	52	30	22	1887	97.32%	98.44%
#180		69	488	0	0	488	20	73	9	386	41	27	14	345	89.38%	92.74%
#181		0	21	0	0	21	6	4	0	11	8	7	1	3	27.27%	30.00%
#182		8	646	0	0	646	33	22	6	585	24	22	2	561	95.90%	96.23%
#183		4	298	0	0	298	13	14	5	266	57	49	8	209	78.57%	81.01%
#184		9	197	0	0	197	12	11	0	174	8	4	4	166	95.40%	97.65%
#185		3	15	0	0	15	12	0	0	3	1	1	0	2	66.67%	66.67%
#186		3	82	0	0	82	13	8	1	60	19	15	4	41	68.33%	73.21%
#187		0	4	0	0	4	0	3	0	1	1	1	0	0	0.00%	0.00%
#188		34	1854	0	0	1854	40	89	4	1721	93	78	15	1628	94.60%	95.43%
#189		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#190		9	411	0	0	411	43	18	5	345	16	16	0	329	95.36%	95.36%
#191		7	619	0	0	619	36	28	2	553	31	22	9	522	94.39%	95.96%
#192		30	1083	0	0	1083	171	146	20	746	286	256	30	460	61.66%	64.25%
#193		16	1261	0	0	1261	29	34	13	1185	38	26	12	1147	96.79%	97.78%
#194		9	51	0	0	51	13	12	3	23	12	10	2	11	47.83%	52.38%
#195		3	0	23	0	23	1	9	3	10	3	1	2	7	70.00%	87.50%
#196		156	0	0	1751	1751	42	677	47	985	400	273	127	585	59.39%	68.18%
#197		0	5	0	0	5	3	1	0	1	0	0	0	1	100.00%	100.00%
#198		47	0	0	11	11	0	2	0	9	0	0	0	9	100.00%	100.00%
#199		47	7166	0	0	7166	435	499	60	6172	270	242	28	5902	95.63%	96.06%
#200		11	824	0	0	824	45	56	1	722	32	22	10	690	95.57%	96.91%

REPORT: PERCENT FLOW ᴵUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#201		1	42	0	0	42	9	5	0	28	12	10	2	16	57.14%	61.54%
#202		23	1148	0	0	1148	81	108	2	957	76	49	27	881	92.06%	94.73%
#203		27	3777	0	0	3777	227	435	5	3110	95	69	26	3015	96.95%	97.76%
#204		22	169	0	0	169	13	3	2	151	72	58	14	79	52.32%	57.66%
#205		6	52	0	0	52	12	7	0	33	13	10	3	20	60.61%	66.67%
#206		0	4	0	0	4	0	1	0	3	2	2	0	1	33.33%	33.33%
#207		2	1921	0	0	1921	83	236	24	1578	186	130	56	1392	88.21%	91.46%
#208		3413	0	0	58140	58140	9506	9097	943	38594	10659	8788	1871	27935	72.38%	76.07%
#209		3413	2426	0	0	2426	248	465	49	1664	507	410	97	1157	69.53%	73.84%
#210		1	0	0	1	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#211		1	343	0	0	343	32	33	7	271	25	15	10	246	90.77%	94.25%
#212		0	97	0	0	97	16	4	1	76	6	5	1	70	92.11%	93.33%
#213		46	513	0	0	513	71	92	10	340	134	116	18	206	60.59%	63.98%
#214		5	20	0	0	20	0	2	0	18	2	2	0	16	88.89%	88.89%
#215		15	76	0	0	76	18	6	3	49	22	22	0	27	55.10%	55.10%
#216		9	377	0	0	377	28	79	5	265	31	20	11	234	88.30%	92.13%
#217		0	18	0	0	18	7	3	0	8	2	0	2	6	75.00%	100.00%
#218		28	1480	0	0	1480	117	150	10	1203	98	81	17	1105	91.85%	93.17%
#219		3	165	0	0	165	11	17	1	136	8	7	1	128	94.12%	94.81%
#220		155	11644	0	0	11644	181	815	40	10608	607	528	79	10001	94.28%	94.99%
#221		3	138	0	0	138	8	11	4	115	16	9	7	99	86.09%	91.67%
#222		0	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#223		14	585	0	0	585	28	105	4	448	94	69	25	354	79.02%	83.69%
#224		11	858	0	0	858	50	62	4	742	49	43	6	693	93.40%	94.16%
#225		0	0	0	2	2	0	0	0	2	2	2	0	0	0.00%	0.00%
#226		1	60	0	0	60	4	11	1	44	29	24	5	15	34.09%	38.46%
#227		2	4	0	0	4	0	2	0	2	2	1	1	0	0.00%	0.00%
#228		1	144	0	0	144	40	31	3	70	6	5	1	64	91.43%	92.75%
#229		1	1195	0	0	1195	45	101	28	1021	69	42	27	952	93.24%	95.77%
#230		6	111	0	0	111	20	15	1	75	18	14	4	57	76.00%	80.28%
#231		0	49	0	0	49	2	4	1	42	12	10	2	30	71.43%	75.00%
#232		7	494	0	0	494	45	31	10	408	191	169	22	217	53.19%	56.22%
#233		66	0	0	15	15	12	1	0	2	1	1	0	1	50.00%	50.00%
#234		66	1661	0	0	1661	283	324	31	1023	363	304	59	660	64.52%	68.46%
#235		0	29	0	0	29	0	11	0	18	0	0	0	18	100.00%	100.00%
#236		7	720	0	0	720	50	48	10	612	10	9	1	602	98.37%	98.53%
#237		0	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#238		0	19	0	0	19	0	0	0	19	1	0	1	18	94.74%	100.00%
#239		18	228	0	0	228	24	36	1	167	23	20	3	144	86.23%	87.80%
#240		0	1	0	0	1	0	0	0	1	1	0	1	0	0.00%	0.00%

REPORT: PERCENT FLOW UGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#241		0	290	0	0	290	14	19	3	254	11	10	1	243	95.67%	96.05%
#242		0	7	0	0	7	2	2	0	3	1	1	0	2	66.67%	66.67%
#243		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#244		15	0	0	32	32	0	0	0	32	32	31	1	0	0.00%	0.00%
#245		2	146	0	0	146	8	21	1	116	5	4	1	111	95.69%	96.52%
#246		0	87	0	0	87	9	14	0	64	10	8	2	54	84.38%	87.10%
#247		21	2457	0	0	2457	220	216	23	1998	178	125	53	1820	91.09%	93.57%
#248		8	1553	0	0	1553	90	134	27	1302	134	117	17	1168	89.71%	90.89%
#249		15	849	0	0	849	47	38	5	759	48	41	7	711	93.68%	94.55%
#250		39	0	0	790	790	400	8	23	359	154	136	18	205	57.10%	60.12%
#251		28	2613	0	0	2613	195	130	27	2261	293	258	35	1968	87.04%	88.41%
#252		0	356	0	0	356	19	40	0	297	25	22	3	272	91.58%	92.52%
#253		0	100	0	0	100	7	6	0	87	6	6	0	81	93.10%	93.10%
#254		1	14	0	0	14	0	2	0	12	4	2	2	8	66.67%	80.00%
#255		53	0	0	490	490	57	55	3	375	41	26	15	334	89.07%	92.78%
#256		53	138	0	0	138	37	16	1	84	20	19	1	64	76.19%	77.11%
#257		1	27	0	0	27	1	14	1	11	3	1	2	8	72.73%	88.89%
#258		4	203	0	0	203	29	28	0	146	23	22	1	123	84.25%	84.83%
#259		38	325	0	0	325	53	26	7	239	46	36	10	193	80.75%	84.28%
#260		0	106	0	0	106	14	4	2	86	10	10	0	76	88.37%	88.37%
#261		9	753	0	0	753	44	115	1	593	53	41	12	540	91.06%	92.94%
#262		0	5	0	0	5	0	3	0	2	2	2	0	0	0.00%	0.00%
#263		1	181	0	0	181	10	18	1	152	18	13	5	134	88.16%	91.16%
#264		0	12	0	0	12	0	0	0	12	2	2	0	10	83.33%	83.33%
#265		0	65	0	0	65	1	0	3	61	3	2	1	58	95.08%	96.67%
#266		3	0	0	270	270	8	15	1	246	26	5	21	220	89.43%	97.78%
#267		3	136	0	0	136	26	18	2	90	15	12	3	75	83.33%	86.21%
#268		3	69	0	0	69	6	12	2	49	32	31	1	17	34.69%	35.42%
#269		0	21	0	0	21	2	6	2	11	3	3	0	8	72.73%	72.73%
#270		1	127	0	0	127	19	25	7	76	48	37	11	28	36.84%	43.08%
#271		10	161	0	0	161	50	18	2	91	38	36	2	53	58.24%	59.55%
#272		0	2	0	0	2	1	0	0	1	0	0	0	1	100.00%	100.00%
#273		5	0	0	1	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#274		5	123	0	0	123	16	46	2	59	12	9	3	47	79.66%	83.93%
#275		50	0	0	220	220	7	19	0	194	10	7	3	184	94.85%	96.34%
#276		50	666	0	0	666	71	67	4	524	105	79	26	419	79.96%	84.14%
#277		9	100	0	0	100	15	22	4	59	29	23	6	30	50.85%	56.60%
#278		0	10	0	0	10	1	1	0	8	5	3	2	3	37.50%	50.00%
#279		0	39	0	0	39	6	5	3	25	14	13	1	11	44.00%	45.83%
#280		4	84	0	0	84	6	8	2	68	8	6	2	60	88.24%	90.91%

REPORT: PERCENT FLOW UGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#281		13	689	0	0	689	75	83	7	524	48	36	12	476	90.84%	92.97%
#282		9	0	0	7	7	6	0	0	1	1	1	0	0	0.00%	0.00%
#283		9	767	0	0	767	120	186	12	449	168	132	36	281	62.58%	68.04%
#284		6	335	0	0	335	10	27	3	295	47	45	2	248	84.07%	84.64%
#285		6	25	0	0	25	1	19	0	5	5	4	1	0	0.00%	0.00%
#286		8	541	0	0	541	106	120	16	299	111	93	18	188	62.88%	66.90%
#287		0	49	0	0	49	3	3	0	43	4	3	1	39	90.70%	92.86%
#288		105	3940	0	0	3940	369	386	47	3138	1339	1223	116	1799	57.33%	59.53%
#289		0	14	0	0	14	1	6	0	7	7	7	0	0	0.00%	0.00%
#290		1	512	0	0	512	63	32	1	416	16	14	2	400	96.15%	96.62%
#291		4	58	0	0	58	1	2	3	52	30	29	1	22	42.31%	43.14%
#292		5	76	0	0	76	9	16	1	50	7	2	5	43	86.00%	95.56%
#293		1	165	0	0	165	14	17	2	132	12	9	3	120	90.91%	93.02%
#294		0	26	0	0	26	7	2	0	17	5	2	3	12	70.59%	85.71%
#295		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#296		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#297		4	242	0	0	242	3	30	3	206	6	5	1	200	97.09%	97.56%
#298		1	27	0	0	27	1	3	2	21	7	5	2	14	66.67%	73.68%
#299		23	0	89	0	89	21	17	14	37	25	15	10	12	32.43%	44.44%
#300		25	0	143	0	143	91	36	11	5	2	2	0	3	60.00%	60.00%
#301		25	4	0	0	4	3	0	0	1	1	1	0	0	0.00%	0.00%
#302		0	0	0	1	1	0	0	0	1	1	1	0	0	0.00%	0.00%
LENS Subtotal		8099	186785	0	0	186785	13402	18105	1868	153410	18628	14446	4182	134782	87.86%	90.32%
EDI Subtotal		1137	0	12335	0	12335	2815	2255	463	6802	3031	2425	606	3771	55.44%	60.86%
TAG Subtotal		6074	0	0	125914	125914	11963	16513	1372	96066	13888	10535	3353	82178	85.54%	88.64%
TOTAL INTERFACES		**15310**	**186785**	**12335**	**125914**	**325034**	**28180**	**36873**	**3703**	**256278**	**35547**	**27406**	**8141**	**220731**	**86.13%**	**88.96%**

REPORT: PERCENT FLOW THRO. ERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#1		35	1205	0	0	1205	62	97	7	1039	316	302	14	723	69.59%	70.54%
#2		0	2	0	0	2	0	0	0	2	1	1	0	1	50.00%	50.00%
#3		12	35	0	0	35	2	5	0	28	7	3	4	21	75.00%	87.50%
#4		1	44	0	0	44	0	6	2	36	8	5	3	28	77.78%	84.85%
#5		17	1082	0	0	1082	54	83	20	925	333	309	24	592	64.00%	65.70%
#6		2	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#7		30	3648	0	0	3648	239	263	25	3121	496	436	60	2625	84.11%	85.76%
#8		29	214	0	0	214	11	27	7	169	54	46	8	115	68.05%	71.43%
#9		3	305	0	0	305	9	12	0	284	17	14	3	267	94.01%	95.02%
#10		41	225	0	0	225	26	25	3	171	28	26	2	143	83.63%	84.62%
#11		41	0	0	111	111	1	43	0	67	27	18	9	40	59.70%	68.97%
#12		7	24	0	0	24	1	2	0	21	4	4	0	17	80.95%	80.95%
#13		38	1063	0	0	1063	89	223	12	739	103	64	39	636	86.06%	90.86%
#14		16	433	0	0	433	16	50	2	365	38	34	4	327	89.59%	90.58%
#15		1	17	0	0	17	1	2	0	14	0	0	0	14	100.00%	100.00%
#16		2	614	0	0	614	19	24	3	568	16	13	3	552	97.18%	97.70%
#17		33	2656	0	0	2656	95	185	15	2361	132	103	29	2229	94.41%	95.58%
#18		33	0	1	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#19		30	102	0	0	102	14	10	2	76	30	26	4	46	60.53%	63.89%
#20		3	122	0	0	122	9	17	0	96	7	5	2	89	92.71%	94.68%
#21		2	21	0	0	21	0	3	0	18	5	4	1	13	72.22%	76.47%
#22		5	61	0	0	61	0	2	0	59	4	3	1	55	93.22%	94.83%
#23		4	863	0	0	863	19	43	0	801	25	20	5	776	96.88%	97.49%
#24		0	66	0	0	66	1	13	0	52	7	7	0	45	86.54%	86.54%
#25		0	0	0	1	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#26		10	192	0	0	192	7	12	1	172	7	4	3	165	95.93%	97.63%
#27		19	638	0	0	638	62	86	3	487	33	31	2	454	93.22%	93.61%
#28		0	225	0	0	225	10	17	3	195	12	12	0	183	93.85%	93.85%
#29		65	18742	0	0	18742	1236	1804	149	15553	966	676	290	14587	93.79%	95.57%
#30		6	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#31		0	24	0	0	24	0	1	0	23	0	0	0	23	100.00%	100.00%
#32		9	163	0	0	163	3	24	0	136	18	16	2	118	86.76%	88.06%
#33		0	10	0	0	10	2	4	0	4	1	1	0	3	75.00%	75.00%
#34		1	79	0	0	79	8	8	0	63	7	4	3	56	88.89%	93.33%
#35		368	144	0	0	144	26	16	4	98	22	19	3	76	77.55%	80.00%
#36		368	0	0	42	42	21	7	1	13	5	3	2	8	61.54%	72.73%
#37		30	74	0	0	74	2	15	0	57	0	0	0	57	100.00%	100.00%
#38		30	0	0	5115	5115	78	480	0	4557	82	43	39	4475	98.20%	99.05%
#39		20	10	0	0	10	0	1	0	9	0	0	0	9	100.00%	100.00%
#40		20	0	0	330	330	12	29	11	278	15	9	6	263	94.60%	96.69%

REPORT: PERCENT FLOW THRC ERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#41		10	10	0	0	10	2	0	0	8	0	0	0	8	100.00%	100.00%
#42		19	325	0	0	325	12	12	4	297	14	12	2	283	95.29%	95.93%
#43		1	39	0	0	39	4	3	2	30	4	4	0	26	86.67%	86.67%
#44		0	370	0	0	370	44	34	2	290	23	22	1	267	92.07%	92.39%
#45		0	126	0	0	126	11	9	3	103	38	35	3	65	63.11%	65.00%
#46		14	927	0	0	927	33	46	5	843	61	52	9	782	92.76%	93.76%
#47		1	1	0	0	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#48		4	1317	0	0	1317	32	90	15	1180	58	46	12	1122	95.08%	96.06%
#49		0	4	0	0	4	1	0	0	3	0	0	0	3	100.00%	100.00%
#50		65	305	0	0	305	62	42	8	193	25	14	11	168	87.05%	92.31%
#51		65	0	0	1033	1033	27	106	0	900	79	35	44	821	91.22%	95.91%
#52		1	5	0	0	5	0	1	0	4	1	0	1	3	75.00%	100.00%
#53		120	5103	0	0	5103	366	428	85	4224	511	386	125	3713	87.90%	90.58%
#54		120	0	1084	0	1084	166	154	2	762	111	68	43	651	85.43%	90.54%
#55		86	110	0	0	110	28	12	3	67	11	6	5	56	83.58%	90.32%
#56		86	0	0	2266	2266	94	214	17	1941	78	51	27	1863	95.98%	97.34%
#57		3	298	0	0	298	16	13	2	267	16	13	3	251	94.01%	95.08%
#58		34	1855	0	0	1855	223	208	19	1405	233	216	17	1172	83.42%	84.44%
#59		0	152	0	0	152	3	7	0	142	4	3	1	138	97.18%	97.87%
#60		0	15	0	0	15	0	3	0	12	1	1	0	11	91.67%	91.67%
#61		5	96	0	0	96	12	2	3	79	13	10	3	66	83.54%	86.84%
#62		108	625	0	0	625	32	80	22	491	79	42	37	412	83.91%	90.75%
#63		108	0	0	2847	2847	57	278	46	2466	89	39	50	2377	96.39%	98.39%
#64		23	405	0	0	405	19	39	1	346	21	16	5	325	93.93%	95.31%
#65		11	618	0	0	618	34	50	3	531	81	38	43	450	84.75%	92.21%
#66		1	2	0	0	2	0	0	0	2	1	1	0	1	50.00%	50.00%
#67		74	188	0	0	188	14	33	1	140	59	43	16	81	57.86%	65.32%
#68		74	0	1	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#69		3	28	0	0	28	2	8	0	18	2	2	0	16	88.89%	88.89%
#70		12	427	0	0	427	22	71	20	314	95	79	16	219	69.75%	73.49%
#71		376	3610	0	0	3610	344	368	76	2822	356	280	76	2466	87.38%	89.80%
#72		376	0	0	9023	9023	203	773	115	7932	156	96	60	7776	98.03%	98.78%
#73		68	19	0	0	19	1	3	0	15	2	2	0	13	86.67%	86.67%
#74		68	0	473	0	473	89	61	51	272	75	21	54	197	72.43%	90.37%
#75		14	141	0	0	141	6	14	1	120	18	16	2	102	85.00%	86.44%
#76		7	1058	0	0	1058	10	52	9	987	29	21	8	958	97.06%	97.85%
#77		0	226	0	0	226	4	12	0	210	8	7	1	202	96.19%	96.65%
#78		0	0	102	0	102	2	16	2	82	5	2	3	77	93.90%	97.47%
#79		448	38573	0	0	38573	938	2866	208	34561	1857	648	1209	32704	94.63%	98.06%
#80		448	0	0	3081	3081	221	316	61	2483	219	158	61	2264	91.18%	93.48%

REPORT: PERCENT FLOW THRO ,ERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#81		41	4455	0	0	4455	270	329	65	3791	187	157	30	3604	95.07%	95.83%
#82		41	0	0	1	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#83		3	160	0	0	160	5	43	1	111	15	14	1	96	86.49%	87.27%
#84		0	37	0	0	37	0	4	0	33	5	3	2	28	84.85%	90.32%
#85		0	27	0	0	27	4	3	0	20	10	4	6	10	50.00%	71.43%
#86		4	363	0	0	363	9	24	3	327	34	23	11	293	89.60%	92.72%
#87		4	0	0	158	158	3	15	1	139	16	7	9	123	88.49%	94.62%
#88		4	15	0	0	15	13	0	0	2	1	1	0	1	50.00%	50.00%
#89		3	17	0	0	17	2	4	0	11	2	1	1	9	81.82%	90.00%
#90		11	1176	0	0	1176	81	150	1	944	46	29	17	898	95.13%	96.87%
#91		172	0	3339	0	3339	38	767	60	2474	1326	1170	156	1148	46.40%	49.53%
#92		5	111	0	0	111	12	11	0	88	24	19	5	64	72.73%	77.11%
#93		5	424	0	0	424	77	22	7	318	82	70	12	236	74.21%	77.12%
#94		44	16	0	0	16	3	0	0	13	1	1	0	12	92.31%	92.31%
#95		44	0	0	651	651	47	106	19	479	263	153	110	216	45.09%	58.54%
#96		116	278	0	0	278	43	84	3	148	67	47	20	81	54.73%	63.28%
#97		116	0	0	211	211	27	56	8	120	40	20	20	80	66.67%	80.00%
#98		124	235	0	0	235	2	24	0	209	7	6	1	202	96.65%	97.12%
#99		124	0	0	20495	20495	301	2208	0	17986	341	214	127	17645	98.10%	98.80%
#100		80	294	0	0	294	1	69	1	223	9	5	4	214	95.96%	97.72%
#101		80	0	0	15277	15277	196	1611	0	13470	902	247	655	12568	93.30%	98.07%
#102		8	83	0	0	83	2	6	0	75	1	1	0	74	98.67%	98.67%
#103		0	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#104		0	3	0	0	3	1	0	0	2	0	0	0	2	100.00%	100.00%
#105		18	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#106		18	0	0	6	6	0	3	0	3	2	2	0	1	33.33%	33.33%
#107		289	0	2624	0	2624	8	782	33	1801	1122	941	181	679	37.70%	41.91%
#108		2	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#109		22	3291	0	0	3291	158	245	12	2876	116	105	11	2760	95.97%	96.34%
#110		10	386	0	0	386	51	14	12	309	133	120	13	176	56.96%	59.46%
#111		1	85	0	0	85	6	4	0	75	1	0	1	74	98.67%	100.00%
#112		10	457	0	0	457	24	3	6	424	31	28	3	393	92.69%	93.35%
#113		0	4	0	0	4	0	1	0	3	0	0	0	3	100.00%	100.00%
#114		9	39	0	0	39	5	6	2	26	10	6	4	16	61.54%	72.73%
#115		9	0	0	3	3	1	1	0	1	0	0	0	1	100.00%	100.00%
#116		8	116	0	0	116	11	13	1	91	18	15	3	73	80.22%	82.95%
#117		23	219	0	0	219	20	25	2	172	34	27	7	138	80.23%	83.64%
#118		0	28	0	0	28	1	0	0	27	0	0	0	27	100.00%	100.00%
#119		3	402	0	0	402	41	34	7	320	39	30	9	281	87.81%	90.35%
#120		0	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%

REPORT: PERCENT FLOW THR SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#121		342	6352	0	0	6352	838	1498	83	3933	1348	1122	226	2585	65.73%	69.73%
#122		0	146	0	0	146	20	4	0	122	6	5	1	116	95.08%	95.87%
#123		69	488	0	0	488	20	73	9	386	41	27	14	345	89.38%	92.74%
#124		69	0	0	2236	2236	39	206	52	1939	52	30	22	1887	97.32%	98.44%
#125		8	644	0	0	644	33	22	6	583	23	22	1	560	96.05%	96.22%
#126		4	298	0	0	298	13	14	5	266	57	49	8	209	78.57%	81.01%
#127		9	197	0	0	197	12	11	0	174	8	4	4	166	95.40%	97.65%
#128		3	2	0	0	2	0	0	0	2	1	1	0	1	50.00%	50.00%
#129		3	6	0	0	6	3	1	0	2	1	1	0	1	50.00%	50.00%
#130		34	1854	0	0	1854	40	89	4	1721	93	78	15	1628	94.60%	95.43%
#131		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#132		9	411	0	0	411	43	18	5	345	16	16	0	329	95.36%	95.36%
#133		7	617	0	0	617	36	28	1	552	30	21	9	522	94.57%	96.13%
#134		30	11	0	0	11	1	3	1	6	4	4	0	2	33.33%	33.33%
#135		16	1253	0	0	1253	29	34	13	1177	37	25	12	1140	96.86%	97.85%
#136		156	0	0	1687	1687	37	638	47	965	386	262	124	579	60.00%	68.85%
#137		47	7166	0	0	7166	435	499	60	6172	270	242	28	5902	95.63%	96.06%
#138		47	0	0	11	11	0	2	0	9	0	0	0	9	100.00%	100.00%
#139		11	823	0	0	823	45	56	1	721	31	22	9	690	95.70%	96.91%
#140		1	39	0	0	39	7	5	0	27	11	9	2	16	59.26%	64.00%
#141		23	1145	0	0	1145	79	108	2	956	75	48	27	881	92.15%	94.83%
#142		27	3777	0	0	3777	227	435	5	3110	95	69	26	3015	96.95%	97.76%
#143		22	2	0	0	2	0	0	1	1	0	0	0	1	100.00%	100.00%
#144		0	4	0	0	4	0	1	0	3	2	2	0	1	33.33%	33.33%
#145		2	1904	0	0	1904	81	236	23	1564	179	129	50	1385	88.55%	91.48%
#146		3413	64	0	0	64	3	52	0	9	4	4	0	5	55.56%	55.56%
#147		3413	0	0	413	413	279	95	1	38	37	8	29	1	2.63%	11.11%
#148		1	341	0	0	341	32	33	6	270	25	15	10	245	90.74%	94.23%
#149		0	97	0	0	97	16	4	1	76	6	5	1	70	92.11%	93.33%
#150		46	38	0	0	38	1	14	0	23	4	4	0	19	82.61%	82.61%
#151		5	20	0	0	20	0	2	0	18	2	2	0	16	88.89%	88.89%
#152		9	329	0	0	329	25	58	2	244	21	14	7	223	91.39%	94.09%
#153		0	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#154		28	1480	0	0	1480	117	150	10	1203	98	81	17	1105	91.85%	93.17%
#155		3	154	0	0	154	10	13	1	130	4	4	0	126	96.92%	96.92%
#156		155	11643	0	0	11643	181	815	40	10607	607	528	79	10000	94.28%	94.98%
#157		3	138	0	0	138	8	11	4	115	16	9	7	99	86.09%	91.67%
#158		14	585	0	0	585	28	105	4	448	94	69	25	354	79.02%	83.69%
#159		11	853	0	0	853	50	61	4	738	47	41	6	691	93.63%	94.40%
#160		1	14	0	0	14	0	4	0	10	7	6	1	3	30.00%	33.33%

REPORT: PERCENT FLOW THRC ERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#161		1	1195	0	0	1195	45	101	28	1021	69	42	27	952	93.24%	95.77%
#162		0	49	0	0	49	2	4	1	42	12	10	2	30	71.43%	75.00%
#163		7	483	0	0	483	41	29	10	403	190	168	22	213	52.85%	55.91%
#164		66	18	0	0	18	0	9	0	9	9	9	0	0	0.00%	0.00%
#165		0	29	0	0	29	0	11	0	18	0	0	0	18	100.00%	100.00%
#166		7	719	0	0	719	50	48	10	611	10	9	1	601	98.36%	98.52%
#167		0	17	0	0	17	0	0	0	17	1	0	1	16	94.12%	100.00%
#168		18	198	0	0	198	22	27	1	148	16	14	2	132	89.19%	90.41%
#169		0	290	0	0	290	14	19	3	254	11	10	1	243	95.67%	96.05%
#170		0	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#171		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#172		2	141	0	0	141	8	19	1	113	5	4	1	108	95.58%	96.43%
#173		0	86	0	0	86	9	14	0	63	9	7	2	54	85.71%	88.52%
#174		21	2442	0	0	2442	218	215	22	1987	173	121	52	1814	91.29%	93.75%
#175		8	1546	0	0	1546	89	134	26	1297	133	116	17	1164	89.75%	90.94%
#176		15	844	0	0	844	46	38	5	755	47	40	7	708	93.77%	94.65%
#177		28	2613	0	0	2613	195	130	27	2261	293	258	35	1968	87.04%	88.41%
#178		0	356	0	0	356	19	40	0	297	25	22	3	272	91.58%	92.52%
#179		0	100	0	0	100	7	6	0	87	6	6	0	81	93.10%	93.10%
#180		1	14	0	0	14	0	2	0	12	4	2	2	8	66.67%	80.00%
#181		53	138	0	0	138	37	16	1	84	20	19	1	64	76.19%	77.11%
#182		53	0	0	490	490	57	55	3	375	41	26	15	334	89.07%	92.78%
#183		1	8	0	0	8	0	1	1	6	0	0	0	6	100.00%	100.00%
#184		4	202	0	0	202	29	28	0	145	23	22	1	122	84.14%	84.72%
#185		38	320	0	0	320	50	26	7	237	45	35	10	192	81.01%	84.58%
#186		0	106	0	0	106	14	4	2	86	10	10	0	76	88.37%	88.37%
#187		9	746	0	0	746	44	114	1	587	52	41	11	535	91.14%	92.88%
#188		0	3	0	0	3	0	2	0	1	1	1	0	0	0.00%	0.00%
#189		1	181	0	0	181	10	18	1	152	18	13	5	134	88.16%	91.16%
#190		0	2	0	0	2	0	0	0	2	1	1	0	1	50.00%	50.00%
#191		0	65	0	0	65	1	0	3	61	3	2	1	58	95.08%	96.67%
#192		3	136	0	0	136	26	18	2	90	15	12	3	75	83.33%	86.21%
#193		3	0	0	268	268	8	15	1	244	26	5	21	218	89.34%	97.76%
#194		3	69	0	0	69	6	12	2	49	32	31	1	17	34.69%	35.42%
#195		0	20	0	0	20	2	6	2	10	3	3	0	7	70.00%	70.00%
#196		1	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#197		0	2	0	0	2	1	0	0	1	0	0	0	1	100.00%	100.00%
#198		50	666	0	0	666	71	67	4	524	105	79	26	419	79.96%	84.14%
#199		50	0	0	220	220	7	19	0	194	10	7	3	184	94.85%	96.34%
#200		9	38	0	0	38	7	5	0	26	10	7	3	16	61.54%	69.57%

REPORT: PERCENT FLOW THR\ SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#201		4	84	0	0	84	6	8	2	68	8	6	2	60	88.24%	90.91%
#202		13	688	0	0	688	75	83	7	523	48	36	12	475	90.82%	92.95%
#203		9	7	0	0	7	0	2	0	5	5	3	2	0	0.00%	0.00%
#204		6	335	0	0	335	10	27	3	295	47	45	2	248	84.07%	84.64%
#205		6	4	0	0	4	0	2	0	2	2	1	1	0	0.00%	0.00%
#206		8	386	0	0	386	50	93	12	231	67	57	10	164	71.00%	74.21%
#207		0	49	0	0	49	3	3	0	43	4	3	1	39	90.70%	92.86%
#208		105	3805	0	0	3805	337	366	44	3058	1300	1189	111	1758	57.49%	59.65%
#209		0	14	0	0	14	1	6	0	7	7	7	0	0	0.00%	0.00%
#210		1	512	0	0	512	63	32	1	416	16	14	2	400	96.15%	96.62%
#211		4	58	0	0	58	1	2	3	52	30	29	1	22	42.31%	43.14%
#212		5	76	0	0	76	9	16	1	50	7	2	5	43	86.00%	95.56%
#213		1	161	0	0	161	12	17	2	130	12	9	3	118	90.77%	92.91%
#214		0	26	0	0	26	7	2	0	17	5	2	3	12	70.59%	85.71%
#215		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#216		4	242	0	0	242	3	30	3	206	6	5	1	200	97.09%	97.56%
#217		1	27	0	0	27	1	3	2	21	7	5	2	14	66.67%	73.68%
#218		25	0	17	0	17	0	13	2	2	0	0	0	2	100.00%	100.00%
LENS Subtotal		7770	166029	0	0	166029	9215	15020	1404	140390	13378	10122	3256	127012	90.47%	92.62%
EDI Subtotal		781	0	7641	0	7641	303	1794	150	5394	2639	2202	437	2755	51.08%	55.58%
TAG Subtotal		5769	0	0	65976	65976	1716	7276	383	56601	2867	1433	1434	53734	94.93%	97.40%
TOTAL INTERFACES		**14320**	**166029**	**7641**	**65976**	**239646**	**11234**	**24090**	**1937**	**202385**	**18884**	**13757**	**5127**	**183501**	**90.67%**	**93.03%**

REPORT: PERCENT FLOW THRC SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#1		2	0	0	13	13	0	6	0	7	7	3	4	0	0.00%	0.00%
#2		12	6	0	0	6	1	0	0	5	2	1	1	3	60.00%	75.00%
#3		1	20	0	0	20	4	1	0	15	4	4	0	11	73.33%	73.33%
#4		17	2	0	0	2	0	1	0	1	0	0	0	1	100.00%	100.00%
#5		0	7	0	0	7	0	2	1	4	3	3	0	1	25.00%	25.00%
#6		2	11	0	0	11	5	0	0	6	1	1	0	5	83.33%	83.33%
#7		30	25	0	0	25	13	3	0	9	4	4	0	5	55.56%	55.56%
#8		29	610	0	0	610	228	58	13	311	160	137	23	151	48.55%	52.43%
#9		41	191	0	0	191	23	10	9	149	25	23	2	124	83.22%	84.35%
#10		41	0	0	37	37	3	8	0	26	13	7	6	13	50.00%	65.00%
#11		7	52	0	0	52	7	9	5	31	16	15	1	15	48.39%	50.00%
#12		12	12	0	0	12	3	7	0	2	1	1	0	1	50.00%	50.00%
#13		10	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#14		16	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#15		33	46	0	0	46	9	16	0	21	4	3	1	17	80.95%	85.00%
#16		7	16	0	0	16	8	0	0	8	0	0	0	8	100.00%	100.00%
#17		30	238	0	0	238	25	42	7	164	32	28	4	132	80.49%	82.50%
#18		3	4	0	0	4	0	0	0	4	2	2	0	2	50.00%	50.00%
#19		7	253	0	0	253	50	18	6	179	63	54	9	116	64.80%	68.24%
#20		0	3	0	0	3	0	1	0	2	1	1	0	1	50.00%	50.00%
#21		0	4	0	0	4	0	0	1	3	2	2	0	1	33.33%	33.33%
#22		0	76	0	0	76	7	8	0	61	15	14	1	46	75.41%	76.67%
#23		6	121	0	0	121	27	10	2	82	42	31	11	40	48.78%	56.34%
#24		9	1	0	0	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#25		2	21	0	0	21	2	0	0	19	10	9	1	9	47.37%	50.00%
#26		1	6	0	0	6	3	0	0	3	1	0	1	2	66.67%	100.00%
#27		368	693	0	0	693	327	46	24	296	121	110	11	175	59.12%	61.40%
#28		368	0	0	59	59	27	6	6	20	8	7	1	12	60.00%	63.16%
#29		0	4	0	0	4	2	0	0	2	2	2	0	0	0.00%	0.00%
#30		10	65	0	0	65	11	6	0	48	22	16	6	26	54.17%	61.90%
#31		8	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#32		1	3	0	0	3	0	1	0	2	2	0	2	0	0.00%	0.00%
#33		0	13	0	0	13	6	1	0	6	2	2	0	4	66.67%	66.67%
#34		14	12	0	0	12	1	5	0	6	0	0	0	6	100.00%	100.00%
#35		36	18	0	0	18	8	2	1	7	6	4	2	1	14.29%	20.00%

REPORT: PERCENT FLOW THR[illegible] SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#36		0	6	0	0	6	3	1	0	2	1	0	1	1	50.00%	100.00%
#37		1	27	0	0	27	26	0	0	1	1	1	0	0	0.00%	0.00%
#38		1	28	0	0	28	18	2	0	8	3	3	0	5	62.50%	62.50%
#39		3	39	0	0	39	12	2	0	25	15	12	3	10	40.00%	45.45%
#40		34	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#41		2	6	0	0	6	0	0	0	6	2	2	0	4	66.67%	66.67%
#42		0	17	0	0	17	3	2	2	10	5	5	0	5	50.00%	50.00%
#43		5	109	0	0	109	14	4	4	87	28	25	3	59	67.82%	70.24%
#44		11	3	0	0	3	2	0	0	1	0	0	0	1	100.00%	100.00%
#45		1	19	0	0	19	11	3	0	5	1	1	0	4	80.00%	80.00%
#46		74	936	0	0	936	190	108	22	616	256	210	46	360	58.44%	63.16%
#47		74	0	5	0	5	4	0	0	1	0	0	0	1	100.00%	100.00%
#48		3	91	0	0	91	34	3	0	54	25	19	6	29	53.70%	60.42%
#49		12	141	0	0	141	11	17	8	105	42	38	4	63	60.00%	62.38%
#50		11	309	0	0	309	42	40	4	223	76	53	23	147	65.92%	73.50%
#51		68	142	0	0	142	22	9	1	110	37	32	5	73	66.36%	69.52%
#52		68	0	1623	0	1623	962	108	114	439	194	111	83	245	55.81%	68.82%
#53		14	112	0	0	112	56	11	4	41	14	11	3	27	65.85%	71.05%
#54		7	3	0	0	3	0	0	0	3	0	0	0	3	100.00%	100.00%
#55		0	2	0	0	2	0	0	0	2	2	1	1	0	0.00%	0.00%
#56		448	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#57		3	615	0	0	615	95	118	1	401	96	78	18	305	76.06%	79.63%
#58		0	9	0	0	9	3	1	0	5	2	2	0	3	60.00%	60.00%
#59		0	6	0	0	6	5	0	0	1	0	0	0	1	100.00%	100.00%
#60		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#61		4	77	0	0	77	25	10	1	41	18	10	8	23	56.10%	69.70%
#62		3	2	0	0	2	1	0	0	1	1	1	0	0	0.00%	0.00%
#63		11	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#64		0	13	0	0	13	2	0	0	11	7	4	3	4	36.36%	50.00%
#65		5	248	0	0	248	50	19	2	177	81	74	7	96	54.24%	56.47%
#66		5	50	0	0	50	13	1	1	35	22	20	2	13	37.14%	39.39%
#67		1	3	0	0	3	2	0	0	1	1	1	0	0	0.00%	0.00%
#68		116	734	0	0	734	105	62	22	545	321	281	40	224	41.10%	44.36%
#69		116	0	0	464	464	293	40	4	127	51	38	13	76	59.84%	66.67%
#70		0	3	0	0	3	0	0	0	3	1	1	0	2	66.67%	66.67%

REPORT: PERCENT FLOW THRC SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#71		8	0	4	0	4	2	0	0	2	1	0	1	1	50.00%	100.00%
#72		10	0	0	11	11	5	2	1	3	3	2	1	0	0.00%	0.00%
#73		21	74	0	0	74	39	11	0	24	11	6	5	13	54.17%	68.42%
#74		4	4	0	0	4	0	0	1	3	2	2	0	1	33.33%	33.33%
#75		0	17	0	0	17	3	2	0	12	1	1	0	11	91.67%	91.67%
#76		0	0	0	2	2	1	0	0	1	1	0	1	0	0.00%	0.00%
#77		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#78		0	3	0	0	3	2	0	0	1	0	0	0	1	100.00%	100.00%
#79		0	5	0	0	5	2	1	0	2	1	0	1	1	50.00%	100.00%
#80		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#81		0	0	0	1	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#82		0	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#83		0	0	0	6	6	0	4	1	1	1	1	0	0	0.00%	0.00%
#84		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#85		0	0	0	3	3	3	0	0	0	0	0	0	0	0.00%	0.00%
#86		18	23	0	0	23	5	0	0	18	3	1	2	15	83.33%	93.75%
#87		18	0	0	313	313	60	56	1	196	63	49	14	133	67.86%	73.08%
#88		4	0	0	18	18	1	8	1	8	4	3	1	4	50.00%	57.14%
#89		2	133	0	0	133	14	8	1	110	91	56	35	19	17.27%	25.33%
#90		2	0	0	11	11	3	0	0	8	6	2	4	2	25.00%	50.00%
#91		113	0	9	0	9	0	5	0	4	2	2	0	2	50.00%	50.00%
#92		22	3	0	0	3	1	0	0	2	1	1	0	1	50.00%	50.00%
#93		10	274	0	0	274	77	14	9	174	80	68	12	94	54.02%	58.02%
#94		1	3	0	0	3	0	1	0	2	1	1	0	1	50.00%	50.00%
#95		0	13	0	0	13	3	0	0	10	3	3	0	7	70.00%	70.00%
#96		9	159	0	0	159	20	16	8	115	54	47	7	61	53.04%	56.48%
#97		9	0	0	66	66	43	7	2	14	5	2	3	9	64.29%	81.82%
#98		23	127	0	0	127	50	11	0	66	42	30	12	24	36.36%	44.44%
#99		23	0	0	2	2	2	0	0	0	0	0	0	0	0.00%	0.00%
#100		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#101		342	752	0	0	752	189	165	16	382	251	182	69	131	34.29%	41.85%
#102		0	21	0	0	21	6	4	0	11	8	7	1	3	27.27%	30.00%
#103		8	2	0	0	2	0	0	0	2	1	0	1	1	50.00%	100.00%
#104		3	13	0	0	13	12	0	0	1	0	0	0	1	100.00%	100.00%
#105		3	76	0	0	76	10	7	1	58	18	14	4	40	68.97%	74.07%

REPORT: PERCENT FLOW THR SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#106		0	4	0	0	4	0	3	0	1	1	1	0	0	0.00%	0.00%
#107		7	2	0	0	2	0	0	1	1	1	1	0	0	0.00%	0.00%
#108		30	1072	0	0	1072	170	143	19	740	282	252	30	458	61.89%	64.51%
#109		16	8	0	0	8	0	0	0	8	1	1	0	7	87.50%	87.50%
#110		9	51	0	0	51	13	12	3	23	12	10	2	11	47.83%	52.38%
#111		156	0	0	64	64	5	39	0	20	14	11	3	6	30.00%	35.29%
#112		0	5	0	0	5	3	1	0	1	0	0	0	1	100.00%	100.00%
#113		11	1	0	0	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#114		1	3	0	0	3	2	0	0	1	1	1	0	0	0.00%	0.00%
#115		23	3	0	0	3	2	0	0	1	1	1	0	0	0.00%	0.00%
#116		22	167	0	0	167	13	3	1	150	72	58	14	78	52.00%	57.35%
#117		6	52	0	0	52	12	7	0	33	13	10	3	20	60.61%	66.67%
#118		2	17	0	0	17	2	0	1	14	7	1	6	7	50.00%	87.50%
#119		3413	64	0	0	64	14	25	0	25	24	23	1	1	4.00%	4.17%
#120		3413	0	0	107	107	37	59	1	10	10	2	8	0	0.00%	0.00%
#121		1	2	0	0	2	0	0	1	1	0	0	0	1	100.00%	100.00%
#122		46	475	0	0	475	70	78	10	317	130	112	18	187	58.99%	62.54%
#123		15	76	0	0	76	18	6	3	49	22	22	0	27	55.10%	55.10%
#124		9	48	0	0	48	3	21	3	21	10	6	4	11	52.38%	64.71%
#125		0	17	0	0	17	7	2	0	8	2	0	2	6	75.00%	100.00%
#126		3	11	0	0	11	1	4	0	6	4	3	1	2	33.33%	40.00%
#127		155	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#128		0	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#129		11	5	0	0	5	0	1	0	4	2	2	0	2	50.00%	50.00%
#130		1	46	0	0	46	4	7	1	34	22	18	4	12	35.29%	40.00%
#131		2	4	0	0	4	0	2	0	2	2	1	1	0	0.00%	0.00%
#132		1	3	0	0	3	0	1	0	2	1	1	0	1	50.00%	50.00%
#133		6	111	0	0	111	20	15	1	75	18	14	4	57	76.00%	80.28%
#134		7	11	0	0	11	4	2	0	5	1	1	0	4	80.00%	80.00%
#135		66	25	0	0	25	7	5	0	13	3	2	1	10	76.92%	83.33%
#136		7	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#137		0	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#138		18	30	0	0	30	2	9	0	19	7	6	1	12	63.16%	66.67%
#139		0	1	0	0	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#140		0	5	0	0	5	2	2	0	1	1	1	0	0	0.00%	0.00%

REPORT: PERCENT FLOW THR[illegible] SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#141		2	5	0	0	5	0	2	0	3	0	0	0	3	100.00%	100.00%
#142		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#143		21	12	0	0	12	2	1	0	9	3	3	0	6	66.67%	66.67%
#144		8	7	0	0	7	1	0	1	5	1	1	0	4	80.00%	80.00%
#145		15	5	0	0	5	1	0	0	4	1	1	0	3	75.00%	75.00%
#146		1	18	0	0	18	1	13	0	4	2	1	1	2	50.00%	66.67%
#147		4	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#148		38	5	0	0	5	3	0	0	2	1	1	0	1	50.00%	50.00%
#149		9	7	0	0	7	0	1	0	6	1	0	1	5	83.33%	100.00%
#150		0	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#151		0	10	0	0	10	0	0	0	10	1	1	0	9	90.00%	90.00%
#152		3	0	0	2	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#153		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#154		1	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#155		10	6	0	0	6	3	0	0	3	3	3	0	0	0.00%	0.00%
#156		9	62	0	0	62	8	17	4	33	19	16	3	14	42.42%	46.67%
#157		0	10	0	0	10	1	1	0	8	5	3	2	3	37.50%	50.00%
#158		0	39	0	0	39	6	5	3	25	14	13	1	11	44.00%	45.83%
#159		13	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#160		9	9	0	0	9	2	3	0	4	0	0	0	4	100.00%	100.00%
#161		6	2	0	0	2	1	0	0	1	1	1	0	0	0.00%	0.00%
#162		8	154	0	0	154	56	26	4	68	44	36	8	24	35.29%	40.00%
#163		105	135	0	0	135	32	20	3	80	39	34	5	41	51.25%	54.67%
#164		1	4	0	0	4	2	0	0	2	0	0	0	2	100.00%	100.00%
#165		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#166		25	4	0	0	4	3	0	0	1	1	1	0	0	0.00%	0.00%
#167		25	0	3	0	3	1	1	0	1	0	0	0	1	100.00%	100.00%
#168		0	0	0	1	1	0	0	0	1	1	1	0	0	0.00%	0.00%
LENS Subtotal		6194	10826	0	0	10826	2440	1342	236	6808	2953	2440	513	3855	56.62%	61.24%
EDI Subtotal		288	0	1644	0	1644	969	114	114	447	197	113	84	250	55.93%	68.87%
TAG Subtotal		4165	0	0	1180	1180	483	235	17	445	188	128	60	257	57.75%	66.75%
TOTAL INTERFACES		**10647**	**10826**	**1644**	**1180**	**13650**	**3892**	**1691**	**367**	**7700**	**3338**	**2681**	**657**	**4362**	**56.65%**	**61.93%**

REPORT: PERCENT FLOW T. .GH SERVICE REQUESTS (UNE DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#1		1	12	0	0	12	2	7	0	3	1	1	0	2	66.67%	66.67%
#2		29	1	0	0	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#3		12	213	0	0	213	27	32	0	154	71	12	59	83	53.90%	87.37%
#4		10	0	146	0	146	70	26	23	27	11	7	4	16	59.26%	69.57%
#5		7	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#6		30	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#7		7	2	0	0	2	0	0	1	1	1	0	1	0	0.00%	0.00%
#8		0	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#9		9	0	186	0	186	128	24	22	12	8	8	0	4	33.33%	33.33%
#10		9	0	0	2	2	1	0	0	1	1	1	0	0	0.00%	0.00%
#11		42	0	212	0	212	163	22	11	16	11	8	3	5	31.25%	38.46%
#12		368	4102	0	0	4102	927	572	100	2503	994	897	97	1509	60.29%	62.72%
#13		368	0	0	224	224	131	22	7	64	19	18	1	45	70.31%	71.43%
#14		0	3	0	0	3	1	0	0	2	1	1	0	1	50.00%	50.00%
#15		0	38	0	0	38	10	7	0	21	15	15	0	6	28.57%	28.57%
#16		8	27	0	0	27	0	6	6	15	10	3	7	5	33.33%	62.50%
#17		36	0	464	0	464	343	35	42	44	33	24	9	11	25.00%	31.43%
#18		120	0	0	1	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#19		0	0	0	2	2	1	1	0	0	0	0	0	0	0.00%	0.00%
#20		50	0	245	0	245	109	53	44	39	23	19	4	16	41.03%	45.71%
#21		11	31	0	0	31	5	24	0	2	2	1	1	0	0.00%	0.00%
#22		68	0	15	0	15	1	5	2	7	3	1	2	4	57.14%	80.00%
#23		16	0	964	0	964	261	60	0	643	2	1	1	641	99.69%	99.84%
#24		0	12	0	0	12	1	1	4	6	6	6	0	0	0.00%	0.00%
#25		448	0	0	8	8	0	8	0	0	0	0	0	0	0.00%	0.00%
#26		11	7	0	0	7	0	4	0	3	3	3	0	0	0.00%	0.00%
#27		15	140	0	0	140	0	33	7	100	63	26	37	37	37.00%	58.73%
#28		172	0	1	0	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#29		0	0	0	1	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#30		116	40	0	0	40	10	16	1	13	13	12	1	0	0.00%	0.00%
#31		116	0	0	43	43	18	17	1	7	6	5	1	1	14.29%	16.67%
#32		8	8	0	0	8	6	0	0	2	2	0	2	0	0.00%	0.00%
#33		0	5	0	0	5	1	3	0	1	1	1	0	0	0.00%	0.00%
#34		21	0	313	0	313	191	45	23	54	12	6	6	42	77.78%	87.50%
#35		25	0	104	0	104	26	25	6	47	46	6	40	1	2.13%	14.29%
#36		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#37		113	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%

REPORT: PERCENT FLOW TH. H SERVICE REQUESTS (UNE DETAIL)
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#38		113	0	165	0	165	139	4	0	22	15	12	3	7	31.82%	36.84%
#39		9	12	0	0	12	2	7	0	3	3	2	1	0	0.00%	0.00%
#40		9	0	0	9	9	5	2	0	2	2	0	2	0	0.00%	0.00%
#41		23	33	0	0	33	7	13	2	11	11	11	0	0	0.00%	0.00%
#42		3	0	23	0	23	1	9	3	10	3	1	2	7	70.00%	87.50%
#43		3413	2298	0	0	2298	231	388	49	1630	479	383	96	1151	70.61%	75.03%
#44		3413	0	0	57620	57620	9190	8943	941	38546	10612	8778	1834	27934	72.47%	76.09%
#45		1	0	0	1	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#46		0	0	0	2	2	0	0	0	2	2	2	0	0	0.00%	0.00%
#47		1	141	0	0	141	40	30	3	68	5	4	1	63	92.65%	94.03%
#48		66	1618	0	0	1618	276	310	31	1001	351	293	58	650	64.94%	68.93%
#49		66	0	0	15	15	12	1	0	2	1	1	0	1	50.00%	50.00%
#50		0	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#51		15	0	0	32	32	0	0	0	32	32	31	1	0	0.00%	0.00%
#52		21	3	0	0	3	0	0	1	2	2	1	1	0	0.00%	0.00%
#53		39	0	0	790	790	400	8	23	359	154	136	18	205	57.10%	60.12%
#54		1	1	0	0	1	0	0	0	1	1	0	1	0	0.00%	0.00%
#55		1	125	0	0	125	19	24	7	75	48	37	11	27	36.00%	42.19%
#56		10	155	0	0	155	47	18	2	88	35	33	2	53	60.23%	61.63%
#57		5	123	0	0	123	16	46	2	59	12	9	3	47	79.66%	83.93%
#58		5	0	0	1	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#59		9	751	0	0	751	118	181	12	440	163	129	34	277	62.95%	68.23%
#60		9	0	0	7	7	6	0	0	1	1	1	0	0	0.00%	0.00%
#61		6	19	0	0	19	0	17	0	2	2	2	0	0	0.00%	0.00%
#62		8	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#63		23	0	89	0	89	21	17	14	37	25	15	10	12	32.43%	44.44%
#64		25	0	123	0	123	90	22	9	2	2	2	0	0	0.00%	0.00%
LENS Subtotal		4309	9930	0	0	9930	1747	1743	228	6212	2297	1884	413	3915	63.02%	67.51%
EDI Subtotal		613	0	3050	0	3050	1543	347	199	961	195	110	85	766	79.71%	87.44%
TAG Subtotal		4618	0	0	58758	58758	9764	9002	972	39020	10833	8974	1859	28187	72.24%	75.85%
TOTAL INTERFACES		**9540**	**9930**	**3050**	**58758**	**71738**	**13054**	**11092**	**1399**	**46193**	**13325**	**10968**	**2357**	**32868**	**71.15%**	**74.98%**

AGGREGATE ORDER TYPES

ERROR DETAILS (Auto Clarifications (A) & Errors (E))

					CAUSATION					
					CLEC Caused			BST Caused		
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
8825	12589	16.33%	16.33%	MISCELLANEOUS	3575	28.40%	5.78%	9014	71.60%	59.295%
1000	7272	9.43%	25.76%	MISCELLANEOUS	7020	96.53%	11.34%	252	3.47%	1.658%
7400	4726	6.13%	31.89%	CLEC DOES NOT OWN THIS ACCOUNT.	4725	99.98%	7.63%	1	0.02%	0.007%
8190	3005	3.90%	35.79%	INVALID USOC FOR BASIC CLASS OF SERVICE. FORMAT SAE 434 I1 S98CP /TN /PKG VM	3005	100.00%	4.85%	0	0.00%	0.000%
9641	2866	3.72%	39.50%	REQUESTED ACTIVITY ALREADY PENDING DM4V32	2864	99.93%	4.63%	2	0.07%	0.013%
8175	2687	3.49%	42.99%	USOC NOT AVAILABLE IN SWITCH. FORMAT SAE 180N I1 ESXDC	2687	100.00%	4.34%	0	0.00%	0.000%
7435	2567	3.33%	46.32%	WKG SVC - INPUT ADL, CONVSN ORD OR NOTE ABAND STA	2567	100.00%	4.15%	0	0.00%	0.000%
8970	2325	3.02%	49.33%	FID RCU WITH TWC FOUND ON SAME LINE AS 3-WAY CALLING USOC	2321	99.83%	3.75%	4	0.17%	0.026%
7055	2319	3.01%	52.34%	NUM= TELNO= ACCOUNT IS FINAL	2303	99.31%	3.72%	16	0.69%	0.105%
9602	2308	2.99%	55.34%	USOC=NSS ALREADY EXISTS ON CUSTOMER RECORD	2291	99.26%	3.70%	17	0.74%	0.112%
8150	2195	2.85%	58.18%	ORDER HAS BEEN REQUEUED FOR THE MAXIMUM NUMBER OF OCCURRENCES	551	25.10%	0.89%	1644	74.90%	10.814%
9627	2113	2.74%	60.92%	ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	2108	99.76%	3.41%	5	0.24%	0.033%
8830	1838	2.38%	63.31%	CLEC ALREADY OWNS THIS ACCOUNT	1810	98.48%	2.92%	28	1.52%	0.184%
7805	1727	2.24%	65.55%	SITE COULD NOT BE DETERMINED	1141	66.07%	1.84%	586	33.93%	3.855%
7465	1686	2.19%	67.73%	CANNOT CANCEL ORDER	1098	65.12%	1.77%	588	34.88%	3.868%
8167	1375	1.78%	69.52%	INVALID USOC CHARACTER. FORMAT SAE 013 I1 CREXI	1375	100.00%	2.22%	0	0.00%	0.000%
8189	1345	1.74%	71.26%	USOC IS NOT VALID ON BST FILE. FORMAT SAE 433 I1 CREX6	1345	100.00%	2.17%	0	0.00%	0.000%
7645	1219	1.58%	72.84%	MATCH IN CSR SA AND LSR HOUSENUM NOT FOUND	482	39.54%	0.78%	737	60.46%	4.848%
9481	1128	1.46%	74.31%	LNUM=00001 FEATURE DOES NOT EXIST ON ACCOUNT TO DISCONNECT	1122	99.47%	1.81%	6	0.53%	0.039%
7718	1043	1.35%	75.66%	UNABLE TO RETRIEVE PSO TO PROCESS SUP	417	39.98%	0.67%	626	60.02%	4.118%
7860	1005	1.30%	76.96%	RSAG - NO EXACT MATCH ON STREET NAME	1002	99.70%	1.62%	3	0.30%	0.020%
9529	1004	1.30%	78.26%	CANNOT RESTORE A LINE WHICH IS NOT SUSPENDED/DENIED	1003	99.90%	1.62%	1	0.10%	0.007%
9515	949	1.23%	79.50%	WKG SVC-INPUT ADL, CONVERSION ORDER OR NOTE ABANDONED STATION	942	99.26%	1.52%	7	0.74%	0.046%
9637	920	1.19%	80.69%	STAR 98 SERVICE IS NOT AVAILABLE FOR THIS CENTRAL OFFICE	911	99.02%	1.47%	9	0.98%	0.059%
7250	915	1.19%	81.88%	LSR HOUSENUMBER INCORRECT	911	99.56%	1.47%	4	0.44%	0.026%
8187	889	1.15%	83.03%	USOC MAY NOT APPEAR ON REQUEST. FORMAT SAE 431 T1 EMP1S /TN	889	100.00%	1.44%	0	0.00%	0.000%
9805	806	1.05%	84.07%	NO DENIAL INDICATOR ON CUSTOMER RECORD	806	100.00%	1.30%	0	0.00%	0.000%
7110	732	0.95%	85.02%	COFFI NOT AVAILABLE	301	41.12%	0.49%	431	58.88%	2.835%
8195	633	0.82%	85.84%	CALL FORWARDING USOC MUST NOT APPEAR. FORMAT SAE 540 I1 GCJ /TN /CFND	633	100.00%	1.02%	0	0.00%	0.000%
7020	607	0.79%	86.63%	NUM= TELNO= TN NOT FOUND IN CRIS	605	99.67%	0.98%	2	0.33%	0.013%
9496	565	0.73%	87.36%	TNS= ON LNUM=00004 NOT FOUND ON EATN= FOR ACT=	492	87.08%	0.79%	73	12.92%	0.480%
7630	526	0.68%	88.05%	MEMORY CALL SERVICE NOT AVAILABLE IN SWITCH	193	36.69%	0.31%	333	63.31%	2.191%
7735	493	0.64%	88.69%	INVALID/MISSING LISTING NAME OR TYPE	493	100.00%	0.80%	0	0.00%	0.000%
7660	468	0.61%	89.29%	USOC FUJ1X NOT FOR RESALE	466	99.57%	0.75%	2	0.43%	0.013%
8240	434	0.56%	89.86%	INVALID LINE CLASS OF SVC FOR REQUESTED SERVICE	434	100.00%	0.70%	0	0.00%	0.000%
8940	432	0.56%	90.42%	CALL FORWARDING NUMBER MISSING OR INVALID	430	99.54%	0.69%	2	0.46%	0.013%
8820	344	0.45%	90.86%	SOCS ERROR: LUD BILL 004 ACT CODE NOT FOR THIS ORD TYPE	227	65.99%	0.37%	117	34.01%	0.770%
8197	342	0.44%	91.31%	CALL FORWARDING USOC MUST APPEAR. FORMAT SAE 541	342	100.00%	0.55%	0	0.00%	0.000%

AGGREGATE ORDER TYPES											
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CAUSATION						
					CLEC Caused			BST Caused			
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
7710	341	0.44%	91.75%	CANNOT CANCEL OR CHANGE DUE DATE ON NON-EXISTENT ORDER	237	69.50%	0.38%	104	30.50%	0.684%
8204	319	0.41%	92.16%	BCR/NSS/NX8 INVALID USOC COMBINATION. FORMAT SAE 575 R1 NSS /TN /SED 08-03-0	319	100.00%	0.52%	0	0.00%	0.000%
8209	317	0.41%	92.57%	USOC COMBINATION IS INVALID. FORMAT SAE 587 I1 ESXDC /TN	317	100.00%	0.51%	0	0.00%	0.000%
9442	282	0.37%	92.94%	DLNUM=0002 LTN= ALI MUST BE UNIQUE	279	98.94%	0.45%	3	1.06%	0.020%
9860	282	0.37%	93.30%	UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	282	100.00%	0.46%	0	0.00%	0.000%
8173	263	0.34%	93.65%	INVALID CLASS OF SERVICE. FORMAT IDNT 131 UEPRL=	263	100.00%	0.42%	0	0.00%	0.000%
9647	243	0.32%	93.96%	BAN DOES NOT EXIST FOR COMPANY CODE	243	100.00%	0.39%	0	0.00%	0.000%
9488	239	0.31%	94.27%	DISPOSITION OF ALL LINES REQUIRED ON ACT V	239	100.00%	0.39%	0	0.00%	0.000%
7890	230	0.30%	94.57%	RSAG - NO EXACT MATCH ON SUPPLEMENTAL ADDRESS	228	99.13%	0.37%	2	0.87%	0.013%
8207	218	0.28%	94.85%	BRD/NSQ/NX9 INVALID USOC COMBINATION. FORMAT SAE 576 I1 NX9 /TN	218	100.00%	0.35%	0	0.00%	0.000%
7225	195	0.25%	95.11%	USOC=: EXC IS MISSING	194	99.49%	0.31%	1	0.51%	0.007%
9439	189	0.25%	95.35%	LTN= DISPOSITION OF LISTINGS ON MIGRATED LINES REQUIRED	188	99.47%	0.30%	1	0.53%	0.007%
7905	183	0.24%	95.59%	RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	183	100.00%	0.30%	0	0.00%	0.000%
7115	172	0.22%	95.81%	DSAP TELEPHONE NUMBER NOT ACTIVE/FOUND IN SITE	69	40.12%	0.11%	103	59.88%	0.678%
9160	169	0.22%	96.03%	LOCBAN INVALID FOR PORTED NUMBER ACTIVITY	169	100.00%	0.27%	0	0.00%	0.000%
7500	163	0.21%	96.24%	DUE DATE COULD NOT BE DETERMINED	37	22.70%	0.06%	126	77.30%	0.829%
8170	154	0.20%	96.44%	USOC MAY ONLY APPEAR ONCE. FORMAT SAE 110 I1 CREX1 /TN 305 556-3023 /RMKR (A	154	100.00%	0.25%	0	0.00%	0.000%
7245	136	0.18%	96.62%	NUM= ZCRT FID, DATA, OR DELIMITER IS MISSING	130	95.59%	0.21%	6	4.41%	0.039%
7715	136	0.18%	96.79%	SOCS TIMEOUT/NOT AVAILABLE	60	44.12%	0.10%	76	55.88%	0.500%
9626	130	0.17%	96.96%	CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP	130	100.00%	0.21%	0	0.00%	0.000%
9475	129	0.17%	97.13%	ACT= ALLOWED ONLY ON SAME LOCNUM SERVICE ADDRESS	129	100.00%	0.21%	0	0.00%	0.000%
9800	125	0.16%	97.29%	MAIN LISTING REQUIRED FOR NEW ACCOUNT	125	100.00%	0.20%	0	0.00%	0.000%
9605	123	0.16%	97.45%	USOC NOT FOR RESALE FORMAT SAE 959 T1 PGRAX /ZPGR 1 /RMKR (A)	123	100.00%	0.20%	0	0.00%	0.000%
7145	109	0.14%	97.59%	INTERVAL BETWEEN DATE RECEIVED AND DDD IS INVALID	108	99.08%	0.17%	1	0.92%	0.007%
7555	109	0.14%	97.73%	FID MISSING IN FEATURE DETAIL	99	90.83%	0.16%	10	9.17%	0.066%
9654	106	0.14%	97.87%	DIRECTORY DELIVERY ADDRESS IS REQUIRED FOR INDEFINITE OR UNNUMBERED ENDU	106	100.00%	0.17%	0	0.00%	0.000%
7910	98	0.13%	98.00%	RSAG - NO MATCH ON EXACT STREET NAME	60	61.22%	0.10%	38	38.78%	0.250%
7725	84	0.11%	98.11%	WAITING PERIOD EQUALS 5 MINUTES	16	19.05%	0.03%	68	80.95%	0.447%
7380	74	0.10%	98.20%	UNE - ACTL INVALID	74	100.00%	0.12%	0	0.00%	0.000%
8179	70	0.09%	98.29%	NPA NXX NOT VALID. FORMAT SAE 184 I1 NXMCR	70	100.00%	0.11%	0	0.00%	0.000%
7815	64	0.08%	98.38%	FID=RCU INVALID OR MISSING DATA	57	89.06%	0.09%	7	10.94%	0.046%
7900	60	0.08%	98.46%	RSAG - NO MATCH ON STREET NAME	58	96.67%	0.09%	2	3.33%	0.013%
9245	55	0.07%	98.53%	CORRECT ECCKT IS REQUIRED FOR LNA , LNUM	55	100.00%	0.09%	0	0.00%	0.000%
7945	51	0.07%	98.59%	RSAG SYSTEM ERROR	6	11.76%	0.01%	45	88.24%	0.296%
8177	50	0.06%	98.66%	USOC INVALID FOR THIS SWITCH. FORMAT SAE 183 I1 TTR	50	100.00%	0.08%	0	0.00%	0.000%
7315	47	0.06%	98.72%	CANNOT GENERATE BILLING NAME AND ADDRESS FIDS	42	89.36%	0.07%	5	10.64%	0.033%
9470	43	0.06%	98.77%	LOCATION QUANTITY DOES NOT EQUAL THE NUMBER OF END USER DETAIL RECORDS F	43	100.00%	0.07%	0	0.00%	0.000%
8183	41	0.05%	98.83%	AREA CALLING PLAN USOC MISMATCH. FORMAT 320 LINE UPP :0000000 / LINE ASSIGN :0	41	100.00%	0.07%	0	0.00%	0.000%

AGGREGATE ORDER TYPES										
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CAUSATION					
					CLEC Caused			BST Caused		
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
7300	40	0.05%	98.88%	UNE - CANNOT GENERATE CLASS OF SERVICE USOC	40	100.00%	0.06%	0	0.00%	0.000%
7360	38	0.05%	98.93%	LIFELINE SERVICE NOT AVAILABLE	13	34.21%	0.02%	25	65.79%	0.164%
7230	37	0.05%	98.98%	REFERENCE OF CALL OPTION NOT VALID FOR THIS ACCOUNT ACTIVITY TYPE	36	97.30%	0.06%	1	2.70%	0.007%
9015	36	0.05%	99.02%	SUP FAILED TO UPDATE DUE DATE	21	58.33%	0.03%	15	41.67%	0.099%
7445	34	0.04%	99.07%	UNE - CALL FORWARD TN REQUIRED	34	100.00%	0.05%	0	0.00%	0.000%
8199	34	0.04%	99.11%	GCJRC/GCJ COMBINATION INVALID. FORMAT SAE 560 I1 GCJRC /TN /PKG VM-CSP-S98F	34	100.00%	0.05%	0	0.00%	0.000%
8415	34	0.04%	99.16%	LSF LP ALREADY EXISTS ON ACCOUNT	34	100.00%	0.05%	0	0.00%	0.000%
9820	34	0.04%	99.20%	INVALID LINE ACTIVITY FOR SUSPENDED ACCOUNT	34	100.00%	0.05%	0	0.00%	0.000%
7295	33	0.04%	99.24%	LINE CLASS OF SERVICE MISSING. NUM AND TN REQUIRED	20	60.61%	0.03%	13	39.39%	0.086%
8180	31	0.04%	99.28%	CALL WAITING DELUXE USOC MUST CHANGE. FORMAT SAE 312	31	100.00%	0.05%	0	0.00%	0.000%
9479	28	0.04%	99.32%	LNUM=00001 FEATURE DOES NOT EXIST ON ACCOUNT TO MODIFY	28	100.00%	0.05%	0	0.00%	0.000%
9165	25	0.03%	99.35%	INVALID NPA NXX	25	100.00%	0.04%	0	0.00%	0.000%
7375	24	0.03%	99.38%	UNE - BOCABS SCREEN ERROR BOE001 ACCOUNT NUMBER NOT FOUND	24	100.00%	0.04%	0	0.00%	0.000%
9516	24	0.03%	99.41%	WSOP OF V AND ADL NOT ALLOWED ON SAME ATN	21	87.50%	0.03%	3	12.50%	0.020%
9543	24	0.03%	99.44%	LOCNUM= HNUM= HT= HT CANNOT BE IN MORE THAN ONE HID	24	100.00%	0.04%	0	0.00%	0.000%
9471	22	0.03%	99.47%	TOTAL QUANTITY OF VCA AND SCO SHOULD EQUAL IWJQ	21	95.45%	0.03%	1	4.55%	0.007%
9466	21	0.03%	99.50%	UNABLE TO DETERMINE BLOCK CHOICE	20	95.24%	0.03%	1	4.76%	0.007%
9616	21	0.03%	99.53%	YPH INVALID	21	100.00%	0.03%	0	0.00%	0.000%
9628	21	0.03%	99.56%	REQUEST DOES NOT QUALIFY FOR STAR 98 SERVICE	21	100.00%	0.03%	0	0.00%	0.000%
9000	20	0.03%	99.58%	LSO/LOCBAN (NPANXX) MISSING OR INVALID	19	95.00%	0.03%	1	5.00%	0.007%
7690	19	0.02%	99.61%	UNE - ACTL AND ENDUSER LSO MUST BE THE SAME FOR LOOP/LINP SERVICE	19	100.00%	0.03%	0	0.00%	0.000%
9476	17	0.02%	99.63%	IS NOT FOUND ON CSR TO DISCONNECT	17	100.00%	0.03%	0	0.00%	0.000%
7267	16	0.02%	99.65%	UNE - LOCBAN MISSING FOR LINP ORDER	16	100.00%	0.03%	0	0.00%	0.000%
8835	16	0.02%	99.67%	USOC/FID CANNOT BE DELETED FOR WORKING TN	16	100.00%	0.03%	0	0.00%	0.000%
9155	16	0.02%	99.69%	UNE - PORTED OUT NUMBER	16	100.00%	0.03%	0	0.00%	0.000%
9484	16	0.02%	99.71%	TNS= FOR LNUM=00001 ALREADY EXIST ON ATN=	15	93.75%	0.02%	1	6.25%	0.007%
7255	15	0.02%	99.73%	NUM= TELNO= DEGREE OR PROF AFFILIATION NOT ALLOWED ON RESIDENTIAL SERVICE	15	100.00%	0.02%	0	0.00%	0.000%
9606	14	0.02%	99.75%	TNS CANNOT BE REASSIGNED FOR 90 DAYS	14	100.00%	0.02%	0	0.00%	0.000%
9060	10	0.01%	99.76%	EU-STREET-1 REQUIRED	10	100.00%	0.02%	0	0.00%	0.000%
9495	10	0.01%	99.77%	EATN= MUST EXIST FOR ACT P AND Q	10	100.00%	0.02%	0	0.00%	0.000%
9523	10	0.01%	99.79%	LOCNUM=000 HNUM=00001 HT= MIXED NPA(S) ARE NOT ALLOWED FOR HUNTING IN THIS	9	90.00%	0.01%	1	10.00%	0.007%
7495	9	0.01%	99.80%	UNE - DIR LOCATOR PROBLEM	2	22.22%	0.00%	7	77.78%	0.046%
7880	9	0.01%	99.81%	RSAG - NO MATCH ON TELEPHONE NUMBER	4	44.44%	0.01%	5	55.56%	0.033%
8250	9	0.01%	99.82%	USOC= NOT APPLICABLE TO PORT LOOP SERVICE	9	100.00%	0.01%	0	0.00%	0.000%
9772	9	0.01%	99.83%	UNE - ECCKT PROHIBITED WITH LINE ACTIVITY OF A	8	88.89%	0.01%	1	11.11%	0.007%
8995	8	0.01%	99.84%	SEMICOLON DISALLOWED WITH (+) SIGN IN PERSONAL NAME LISTINGS	8	100.00%	0.01%	0	0.00%	0.000%
9517	7	0.01%	99.85%	UNDC INVALID IF PIC ALREADY EXISTS	7	100.00%	0.01%	0	0.00%	0.000%
7095	6	0.01%	99.86%	INCORRECT RATE ZONE DATA RECEIVED FROM RSAG	3	50.00%	0.00%	3	50.00%	0.020%

AGGREGATE ORDER TYPES											
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CAUSATION						
					CLEC Caused			BST Caused			
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
7570	6	0.01%	99.87%	SEQ1X NOT ALLOWED WITH ZNB	4	66.67%	0.01%	2	33.33%	0.013%
8945	6	0.01%	99.88%	LINECLSSVC AND TOS DO NOT MATCH	6	100.00%	0.01%	0	0.00%	0.000%
7740	5	0.01%	99.88%	LOCAL CALLING PLUS INDICATOR NOT FOUND	4	80.00%	0.01%	1	20.00%	0.007%
8155	5	0.01%	99.89%	DIRECTORY DELIVERY INVALID WHEN ACT IS W	3	60.00%	0.00%	2	40.00%	0.013%
7850	4	0.01%	99.89%	RSAG - NEED ADDITIONAL ADDRESS OR TN	4	100.00%	0.01%	0	0.00%	0.000%
7875	4	0.01%	99.90%	RSAG - NO MATCH ON HOUSE NUMBER OR AHN - ONLY NUMBERED RANGES	4	100.00%	0.01%	0	0.00%	0.000%
8885	4	0.01%	99.91%	LINE ACT IS V AND LINE IS NOT ON CUSTOMER RECORD	3	75.00%	0.00%	1	25.00%	0.007%
9629	4	0.01%	99.91%	CALL FORWARDING FID (CFND) AND CFND TN REQUIRED BEHIND USOC S98AF	4	100.00%	0.01%	0	0.00%	0.000%
9815	4	0.01%	99.92%	INVALID LINE ACTIVITY FOR DENIED ACCOUNT	4	100.00%	0.01%	0	0.00%	0.000%
7785	3	0.00%	99.92%	RSAG SITE TABLE LOOKUP FAILED TO FIND A MATCH	2	66.67%	0.00%	1	33.33%	0.007%
7935	3	0.00%	99.92%	RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP	3	100.00%	0.00%	0	0.00%	0.000%
8185	3	0.00%	99.93%	ESC/ESCWT NOT VALID COMBINATION. FORMAT SAE 424 I1 ESCWT	3	100.00%	0.00%	0	0.00%	0.000%
8193	3	0.00%	99.93%	USOC NOT VALID WITH CALLER ID. FORMAT SAE 473 I1 NXMCR /TN	3	100.00%	0.00%	0	0.00%	0.000%
8980	3	0.00%	99.94%	LINE ACTIVITY INVALID	2	66.67%	0.00%	1	33.33%	0.007%
9110	3	0.00%	99.94%	TELNO= PIC REQUIRED PER UNIQUE TELEPHONE NUMBER ON A, V, P9 LINE ACTIVITY TY	3	100.00%	0.00%	0	0.00%	0.000%
9115	3	0.00%	99.94%	TELNO= LPIC REQUIRED PER UNIQUE TELNO ON A, V, P9 LINE ACTIVITY TYPES	3	100.00%	0.00%	0	0.00%	0.000%
9190	3	0.00%	99.95%	ZIP CODE IS NOT NUMERIC	3	100.00%	0.00%	0	0.00%	0.000%
9263	3	0.00%	99.95%	NC CODE IS A REQUIRED FIELD FOR LOOP REQUESTS	3	100.00%	0.00%	0	0.00%	0.000%
9432	3	0.00%	99.95%	DLNUM=0001 LTN= LTXTY OF CR REQUIRES SEE AS FIRST WORK IN LTEXT	3	100.00%	0.00%	0	0.00%	0.000%
9438	3	0.00%	99.96%	DLNUM=0001 LTN= ACCOUNT ACTIVITY OF N CAN ONLY HAVE AN LACT OF N	3	100.00%	0.00%	0	0.00%	0.000%
9618	3	0.00%	99.96%	EQUAL NUMBER OF COMPLETE CHOICE AND COMPLETE CHOICE CREDIT USOCS REQUI	3	100.00%	0.00%	0	0.00%	0.000%
7100	2	0.00%	99.96%	PIC/LPIC IS REQUIRED ON INWARD ACTIVITY	0	0.00%	0.00%	2	100.00%	0.013%
7150	2	0.00%	99.97%	UNE - ERROR GENERATING ECCKT	0	0.00%	0.00%	2	100.00%	0.013%
8425	2	0.00%	99.97%	LSF OF DE INVALID ON ACT TYPE A OR V	2	100.00%	0.00%	0	0.00%	0.000%
9005	2	0.00%	99.97%	LNECLSSVC NOT ALLOWED ON R ACCOUNT ACTIVITY	2	100.00%	0.00%	0	0.00%	0.000%
9045	2	0.00%	99.98%	TYPE OF ORDER NOT DETERMINED - CLS SVC AND TOS BLANK OR MISSING	2	100.00%	0.00%	0	0.00%	0.000%
9434	2	0.00%	99.98%	DLNUM=0001 LTN= HTN ACCOUNT DOES NOT HAVE AN EXACT MATCH WITH DL DATA	2	100.00%	0.00%	0	0.00%	0.000%
9474	2	0.00%	99.98%	MINIMUM OF TWO DIFFERENT LEATNS/LEANS REQUIRED FOR LSR	2	100.00%	0.00%	0	0.00%	0.000%
9487	2	0.00%	99.98%	INVALID ACT TYPE FOR FULL MIGRATION	2	100.00%	0.00%	0	0.00%	0.000%
9600	2	0.00%	99.99%	TASKMATE ERROR INCORRECT SCREEN FORMAT ON HOST	1	50.00%	0.00%	1	50.00%	0.007%
9639	2	0.00%	99.99%	CATEGORY L USOC MUST APPEAR FOR SAME TN	2	100.00%	0.00%	0	0.00%	0.000%
9646	2	0.00%	99.99%	INVALID BAN FOR REQTYP/COMPANY CODE COMBINATION OR INVALID COMPANY CODE	2	100.00%	0.00%	0	0.00%	0.000%
6056	1	0.00%	99.99%	REFNUM=0001 -INPT=D ONLY APPLICABLE TO LNP-ROUTED TO LEO IN ERROR	1	100.00%	0.00%	0	0.00%	0.000%
7755	1	0.00%	99.99%	UNE - NPANXX NOT FOUND IN CLLI TABLE	0	0.00%	0.00%	1	100.00%	0.007%
7870	1	0.00%	99.99%	RSAG - NO MATCH ON HOUSE NUMBER OR AHN - ONLY UNNUMBERED RANGES	1	100.00%	0.00%	0	0.00%	0.000%
8130	1	0.00%	100.00%	CONVERSION SPECIFIED CAN ONLY BE USED ON RETAIL TO UNE SERVICE	1	100.00%	0.00%	0	0.00%	0.000%
8925	1	0.00%	100.00%	CFN HAS INVALID FORMAT ON COFFI SCREEN	0	0.00%	0.00%	1	100.00%	0.007%
9090	1	0.00%	100.00%	NUM= TELNO= LINE ACTIVITY MUST BE Y OR L WHEN ACCOUNT ACTIVITY IS SS OR RS	0	0.00%	0.00%	1	100.00%	0.007%

AGGREGATE ORDER TYPES										
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CAUSATION					
					CLEC Caused			BST Caused		
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
9125	1	0.00%	100.00%	NUM= -TELNO= TBE PROHIBITED ON THIS ACTIVITY FOR THIS REQTYPE	1	100.00%	0.00%	0	0.00%	0.000%
	77100	100.00%			61898		100.00%	15202		100.000%

REPORT: FLOW JUGH ERROR ANALYSIS
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES

ERROR DETAILS (Fatal Errors)

Error Type (by error code)	Count	%	Σ %	Error Description
1015	3837	30.979%	30.979%	PON DUPLICATE ON INITIAL LSR
2025	813	6.564%	37.542%	EU-ZIP CODE REQUIRED
1645	482	3.891%	41.434%	LSR/PON AGED OFF
1027	477	3.851%	45.285%	PREVIOUS LSR AGED OFF - (K) STATUS
1023	474	3.827%	49.112%	NO ORIGINAL LSR FOUND FOR THIS SUP
4055	445	3.593%	52.705%	DLNUM=&DLNM LTN=&LTN ALI MUST BE UNIQUE
1650	429	3.464%	56.168%	LSR/PON COMPLETED
1330	416	3.359%	59.527%	BAN1 MUST = E, N OR VALID BILLING ACCOUNT NUMBER FORMAT
4115	415	3.351%	62.877%	SIC REQUIRED WHEN FIRST CHARACTER OF TOS IS 1 OR 3
1640	362	2.923%	65.800%	NO ORIGINAL LSR FOUND FOR THIS SUP
1030	351	2.834%	68.634%	VER MUST BE GREATER THAN PREVIOUS VERSION
1655	347	2.802%	71.435%	LSR ORIGINATING FORMAT (TCIF) NOT SAME AS ORIGINATING FORMAT
1154	312	2.519%	73.954%	LSR/PON IS COMPLETED
4028	302	2.438%	76.393%	REFNUM=0001-TELNO= COMMA OR SEMICOLON REQUIRED FOR RESIDENCE LISTING
1153	273	2.204%	78.597%	SUP NOT ALLOWED ON THIS ACCOUNT ACTIVITY TYPE
4029	177	1.429%	80.026%	REFNUM=0001-TELNO= COMMA OR SEMICOLON REQUIRED FOR BUSINESS LISTING
4010	156	1.259%	81.285%	REFNUM=0001-TELNO= LIST REQUIRED WITH THIS REQTYPE AND ACTIVITY TYPE
1635	131	1.058%	82.343%	LSR ORIGINATING SOURCE NOT SAME AS PRIOR VERSION
4042	130	1.050%	83.393%	REFNUM=0001-TELNO= ASTERISK OR PLUS SIGN INVALID FOR LA
3530	118	0.953%	84.345%	LOCNUM=000 LNUM=00001 TELNO= NPT REQUIRED WITH THIS REQTYP LNA TYPE COMBINATION
1050	104	0.840%	85.185%	D/SENT - D/SENT CENTURY MUST BE CURRENT OR FUTURE DATE
2067	101	0.815%	86.000%	LOCBAN MUST BE 10 OR 13 ALPHANUMERICS
1007	96	0.775%	86.775%	DUPLICATE CC, PON, VER
3030	95	0.767%	87.542%	REFNUM=0001-TELNO= TN MUST BE 10 NUMERICS
4052	95	0.767%	88.309%	YPH ENTRY MUST BE 999001 WHEN LISTING TYPE IS NL OR NP
4027	94	0.759%	89.068%	REFNUM=0001-TELNO= ASTERISK OR PLUS SIGN INVALID FOR LN
3070	64	0.517%	89.585%	LPIC DATA REQUIRED PER UNIQUE TELNO ON A, V, P9 ACTIVITY TYPES
1012	60	0.484%	90.069%	CANNOT SUPP A PREVIOUSLY CANCELED LSR/PON
1085	55	0.444%	90.513%	DDDO-CC/DDDO MUST BE CURRENT OR FUTURE DATE
3060	55	0.444%	90.958%	PIC REQUIRED PER UNIQUE TELEPHONE NUMBER ON A, V, P9 LINE ACTIVITY TYPES
4050	52	0.420%	91.377%	INVALID YPH ENTRY
3075	51	0.412%	91.789%	VALID LPIC ENTRIES ARE AN LPIC CODE, NA OR NONE

AGGREGATE ORDER TYPES

ERROR DETAILS (Fatal Errors)

Error Type (by error code)	Count	%	Σ %	Error Description
1070	50	0.404%	92.193%	DDD/DDD-CC MUST BE CURRENT OR FUTURE DATE
1170	50	0.404%	92.596%	CHC REQUIRED WHEN REQTYP IS A OR B AND DFDT IS POPULATED
3090	46	0.371%	92.968%	REFNUM=0001-TELNO= TC OPT PROHIBITED ON THIS ACT TYPE AND REQTYP
3185	46	0.371%	93.339%	REFNUM=0001-TELNO= FEATURE REQUIRED WHEN THE FEATURE ACTIVITY IS POPULATED
1630	38	0.307%	93.646%	CANNOT SUP A PREVIOUSLY CANCELED LSR/PON
2120	35	0.283%	93.929%	EATN, EAN, ATN OR AN ARE PROHIBITED ON THIS REQTYP/ACT CODE
3065	34	0.275%	94.203%	PIC VALID ENTRIES ARE PIC CODE OF 4 NUMERICS, NONE, DFLT, NA
4015	33	0.266%	94.470%	REFNUM=0001-TELNO= LIST MUST BE VALID ENTRY
3190	30	0.242%	94.712%	REFNUM=0001-TELNO= LNECLSSVC MUST BE = 3 OR 5 ALPHANUMERICS
3135	27	0.218%	94.930%	REFNUM=0001-TELNO= TC PER-CC/TC PER-DATE REQUIRED WHEN TCTO-PRIMARY FIELD IS POPULATED
3175	25	0.202%	95.132%	REFNUM=0001-TELNO= FA REQUIRED WHEN THE FEATURE FIELD IS POPULATED
1272	24	0.194%	95.325%	RPON VALID VALUES ARE UPPER CASE ALPHA A THRU Z, NUMERIC 0 THRU 9, AND SYMBOLS . , - '
1664	24	0.194%	95.519%	SUP 03 NOT ALLOWED ON THIS ACCOUNT ACTIVITY TYPE
3085	24	0.194%	95.713%	TC OPT VALID ENTRIES ARE:00, 03, 05, 08, 21, 23, 25, 26, 31, 51, 81
2010	22	0.178%	95.891%	EU-CITY REQUIRED
1022	20	0.161%	96.052%	LSR ORIGINATING SOURCE NOT SAME AS PRIOR VERSION
3021	20	0.161%	96.213%	REFNUM=0002-TELNO= LNA MUST BE V OR W WHEN AN, ATN, EAN OR EATN IS POPULATED
3125	18	0.145%	96.359%	LOCNUM=000 LNUM=00001 TELNO= ECCKT FORMAT INVALID
1215	17	0.137%	96.496%	ACTL MUST BE 11 ALPHANUMERIC CHARACTERS
4000	17	0.137%	96.633%	DL DATA ELEMENTS REQUIRED
1025	16	0.129%	96.762%	VER MUST BE GREATER THAN PREVIOUS VERSION
1110	16	0.129%	96.892%	INVALID REQTYP - ACCOUNT ACTIVITY TYPE COMBINATION
1230	16	0.129%	97.021%	LSO MUST BE 6 NUMERICS
4040	15	0.121%	97.142%	REFNUM=0001-TELNO= LISTED ADDRESS REQUIRED WITH THIS REQTYP AND ACTIVITY TYPE
1080	14	0.113%	97.255%	DDD/DDD-CC MUST BE A VALID DATE
3260	13	0.105%	97.360%	LOCNUM=000 LNUM=00001 TELNO= JK CODE REQUIRED WHEN NIDR IS POPULATED WITH Y
4120	13	0.105%	97.465%	DLNUM=0001 LTN=10 TOA B, R, RP OR BP REQUIRED
3040	12	0.097%	97.562%	REFNUM=0001-TELNO= OTN PROHIBITED WHEN LNA = A, D, W, Y, L, P9
3115	12	0.097%	97.659%	LOCNUM=000 LNUM=00001 TELNO= ECCKT IS PROHIBITED WITH REQTYP/ACT/LNA COMBINATION
2065	11	0.089%	97.747%	LOCBAN REQUIRED
2090	10	0.081%	97.828%	FB-STATE REQUIRED IF FBI = D

AGGREGATE ORDER TYPES

ERROR DETAILS (Fatal Errors)

Error Type (by error code)	Count	%	Σ %	Error Description
2100	10	0.081%	97.909%	FB-ZIPCODE REQUIRED IF FBI = D
4160	10	0.081%	97.990%	DLNUM=0001 LTN= DOI REQUIRED VALUE MUST BE 0 - 6
2080	9	0.073%	98.062%	LOCNUM=000 SADLO REQUIRED WHEN SANO IS NOT POPULATED AT THIS LOCATION
2085	9	0.073%	98.135%	FB-CITY REQUIRED IF FBI = D
2105	9	0.073%	98.208%	FBCON REQUIRED IF FBI FIELD = D
2110	9	0.073%	98.280%	FBCON-TELNO REQUIRED IF FBI FIELD = D
4180	9	0.073%	98.353%	DLNUM=0001 LTN= DOI VALUE MUST BE ZERO
1172	8	0.065%	98.418%	CC MUST BE 4 ALPHANUMERICS
4600	8	0.065%	98.482%	DLNUM=0001 LTN= AMPERSAND REQUIRED WITH DLNM
3045	7	0.057%	98.539%	REFNUM=0001 ECCKT MUST BE CLT, CLF OR CLS FORMAT
3055	7	0.057%	98.595%	REFNUM=0001-TELNO= FPI MUST BE VALID VALUE FOR REQTYP AND ACTIVITY
3170	7	0.057%	98.652%	REFNUM=0001-TELNO= CFA INVALID FORMAT
1125	6	0.048%	98.700%	DDD MUST BE GREATER THAN OR EQUAL TO D/TSENT
2000	6	0.048%	98.749%	EU-NAME REQUIRED
2005	6	0.048%	98.797%	EU-STREET-1 REQUIRED
2015	6	0.048%	98.845%	EU-STATE REQUIRED
3035	6	0.048%	98.894%	REFNUM=0001-TELNO= OTN MUST BE 10 NUMERICS
3130	6	0.048%	98.942%	REFNUM=0001-TELNO= TC PER-CC/TC PER-DATE MUST BE CURRENT OR FUTURE DATE
3165	6	0.048%	98.991%	REFNUM=0001-TELNO= TBE PROHIBITED ON THIS ACTIVITY FOR THIS REQTYPE
3195	6	0.048%	99.039%	TELNO= LNECLSSVC REQUIRED ON ACT TYPE A OR V
8000	6	0.048%	99.088%	LOCNUM= DISCNBR=&DISCNM DNUM=&DNUM TC OPT VALID ENTRY IS ST, NO OR TC
1345	5	0.040%	99.128%	TOS REQUIRED WITH THIS REQTYP/ACT TYPE COMBINATION (STOP EDIT)
1660	5	0.040%	99.168%	SUP NOT ALLOWED ON THIS ACCOUNT ACTIVITY TYPE
3245	5	0.040%	99.209%	LOCNUM=000 LNUM=00001 TELNO= IWJQ REQUIRED WHEN JR IS Y
4026	5	0.040%	99.249%	MAIN LISTING REQUIRED FOR NEW ACCOUNT
6045	5	0.040%	99.290%	INVALID NC/NCI/SECNCI COMBINATION (STOP EDIT)
8180	5	0.040%	99.330%	CALL WAITING DELUXE USOC MUST CHANGE. FORMAT SAE 312
1065	4	0.032%	99.362%	AN MUST BE 10 OR 13 ALPHANUMERICS
1120	4	0.032%	99.394%	DDD REQUIRED
1605	4	0.032%	99.427%	REMARKS VIRGULES (/) AND ASTERISKS (*) NOT ALLOWED IN THIS FIELD
4110	4	0.032%	99.459%	DLNUM=0002 LTN= VALID STYC CI, SH, SI, OR SL REQUIRED

REPORT: FLOW .OUGH ERROR ANALYSIS
REPORT PERIOD: 10/01/00 - 10/31/00

AGGREGATE ORDER TYPES

ERROR DETAILS (Fatal Errors)

Error Type (by error code)	Count	%	Σ %	Error Description
1017	3	0.024%	99.483%	PON VALID VALUES ARE UPPER CASE ALPHA A THRU Z, NUMERIC 0 THRU 9, AND SYMBOLS . , - '
1060	3	0.024%	99.508%	AN PROHIBITED WHEN ATN IS POPULATED UNLESS REQTYP IS B
1220	3	0.024%	99.532%	LST MUST BE 11 ALPHA/NUMERIC CHARACTERS
1453	3	0.024%	99.556%	BAN1 REQUIRED WITH THIS REQTYP/ACT TYPE COMBINATION
3015	3	0.024%	99.580%	REFNUM=0001-TELNO= LNA REQUIRED
4030	3	0.024%	99.604%	REFNUM=0001-TELNO= LISTED NAME PROHIBITED WITH THIS REQTYPE AND ACTIVITY TYPE
4045	3	0.024%	99.629%	REFNUM=0001-TELNO= LISTED ADDRESS PROHIBITED WITH THIS RECTYP AND ACTIVITY TYPE
6050	3	0.024%	99.653%	REQTYP/LOOP TYPE COMBINATION INVALID
7075	3	0.024%	99.677%	EATN, AN AND ATN ARE REQUIRED FOR REQTYP B
1255	2	0.016%	99.693%	NC MUST BE 4 ALPHANUMERIC CHARACTERS WITH HYPHEN ALLOWED IN THE 3RD AND 4TH POSITIONS
2030	2	0.016%	99.709%	LCON-TELNO MUST BE A MINIMUM OF 10 NUMERICS
3460	2	0.016%	99.725%	LOCNUM=000 LNUM= TELNO= LNUM REQUIRED WITH THIS REQTYP/LNA TYPE COMBINATION (STOP EDIT)
4310	2	0.016%	99.742%	DLNUM=0001 LTN= LANO PROHIBITED WITHOUT LASN
1032	1	0.008%	99.750%	VER MUST BE SPACES OR 00(ZEROS) FOR 850
1040	1	0.008%	99.758%	VER MUST BE SPACES OR ZEROES FOR 850
1150	1	0.008%	99.766%	SUP PROHIBITED WHEN 1ST CHARACTER OF REQTYP FIELD CHANGES
1155	1	0.008%	99.774%	DFDT MUST BE POPULATED WITH A SINGLE (HHMM) TIME WHEN CHC IS Y
1200	1	0.008%	99.782%	SUP REQUIRED WHEN VER IS GREATER THAN 00
1205	1	0.008%	99.790%	DATED-CC/DATED REQUIRED WHEN AGAUTH FIELD IS POPULATED
1335	1	0.008%	99.798%	LSO REQUIRED WITH THIS REQTYP/ACT TYPE COMBINATION
1445	1	0.008%	99.806%	INITIATOR TELEPHONE NUMBER REQUIRED
1450	1	0.008%	99.814%	INITIATOR TELEPHONE NUMBER MUST BE A MINIMUM OF 10 NUMERICS
2115	1	0.008%	99.822%	FBCON-TELNO MUST BE MINIMUM OF 10 NUMERICS
2355	1	0.008%	99.830%	ERL PROHIBITED WITH THIS REQTYP/ACT TYPE COMBINATION
3240	1	0.008%	99.839%	LOCNUM=000 LNUM=00001 TELNO= IWJQ REQUIRED WHEN IWJK IS POPULATED
3420	1	0.008%	99.847%	LOCNUM=000 LNUM=00001 TELNO= LNA MUST BE N, C, D, P, OR X IF ACT IS C
3485	1	0.008%	99.855%	LOCNUM=001 LNUM=00001 LOCNUM DOES NOT MATCH AN END USER LOCNUM FOR THIS LSR
3745	1	0.008%	99.863%	LNUM=00001 TELNO= PIC VALID ENTRIES ARE NONE, UNDC OR A VALID PIC CODE WHEN LNA IS G, N OR
4020	1	0.008%	99.871%	REFNUM=0001-TELNO= LIST PROHIBITED WITH THIS REQTYPE AND ACTIVITY TYPE
4035	1	0.008%	99.879%	REFNUM=0001-TELNO= LISTED NAME OVERFLOW PROHIBITED WITH THIS REQTYPE AND ACTIVITY TYPE
4060	1	0.008%	99.887%	DLNUM=0001 LTN= VALID RTY REQUIRED

AGGREGATE ORDER TYPES

ERROR DETAILS (Fatal Errors)

Error Type (by error code)	Count	%	Σ %	Error Description
4070	1	0.008%	99.895%	REFNUM=0001-TELNO= YPQTY MUST BE 2 NUMERICS OR BLANKS
4075	1	0.008%	99.903%	MAIN LISTING REQUIRED
4077	1	0.008%	99.911%	REFNUM=0001-TELNO= DDA-NAME2 PROHIBITED WITH THIS REQTYPE AND ACTIVITY TYPE
4085	1	0.008%	99.919%	REFNUM=0001-TELNO= DDA-ADDRESS 1 PROHIBITED WITH THIS REQTYPE AND ACTIVITY TYPE
4090	1	0.008%	99.927%	REFNUM=0001-TELNO= DDA-ADDRESS 2 PROHIBITED WITH THIS REQTYP AND ACTIVITY TYPE
4095	1	0.008%	99.935%	REFNUM=0001-TELNO= DDA-CITY PROHIBITED FOR THIS REQTYP AND ACTIVITY TYPE
4100	1	0.008%	99.943%	REFNUM=0001-TELNO= DDA-STATE PROHIBITED WITH THIS REQTYP AND ACTIVITY TYPE
4140	1	0.008%	99.952%	REFNUM=0001-TELNO= DIRDATE-CC/DIRDATE PROHIBITED WITH THIS REQTYP AND ACTIVITY TYPE
4185	1	0.008%	99.960%	DLNUM=0002 LTN= DOI DATA INVALID WITH LTY 3
4385	1	0.008%	99.968%	DLNUM=0001 LTN= INVALID LAST ENTRY
5135	1	0.008%	99.976%	LOCNUM=000 HNUM=00001 HTSEQ=0005 SAME HT NOT ALLOWED IN MORE THAN ONE HTSEQ WHEN HLA IS N OR E
5153	1	0.008%	99.984%	LOCNUM=000 HNUM=00001 HT REQUIRED FOR THIS HA/HLA COMBINATION
6005	1	0.008%	99.992%	NC CODE INVALID
6048	1	0.008%	100.000%	COMPANY IS NOT QUALIFIED FOR XDSL/UCL
	12386	100.000%		

AGGREGATE ORDER TYPES

ERROR DETAILS - 8825

Error Type (by error code)	Error Description
8825	ORDER ERR: SA LIST 023 LIN STREET NAME FOR SA NOT VALID FOR NPA NXX!
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA
8825	ORDER ERR: CS IDNT 011 LIN USOC FOLLOWING CS IS INCORRECT! OCS 1FR
8825	ORDER ERR: LN LIST 010 LIN RECAPPED LN, NLST OR NP MAY NOT APPEAR! ILN (LNR) CROS
8825	ORDER ERR: DSA IDNT 010 LI DSA PRESENT - NEED CATEGORY L USOC OR SMV USOC!
8825	ORDER ERR: TN SAE 038 LINE TN OR TLI IS REQUIRED FOR INWARD CATEGORY D USOCS!
8825	ORDER ERR: PR SAE 010 LINE ZERO MUST NOT APPEAR AS FIRST CHARACTER! I1 UEAC2 /C
8825	ORDER ERR: PR SAE 010 LINE ZERO MUST NOT APPEAR AS FIRST CHARACTER! I1 UEAC2 /C
8825	ORDER ERR: PR SAE 010 LINE ZERO MUST NOT APPEAR AS FIRST CHARACTER! I1 UEAC2 /C
8825	ORDER ERR: ZLLU SAE 009 LI ZLLU MUST APPEAR!
8825	ORDER ERR: TYA BILL 008 LI TYA REQUIRED WITH SIC CODE OF 98XX
8825	ORDER ERR: LCON SAE 007 LI LCON FORMAT INCORRECT! IG2 CKL
8825	ORDER ERR: RCU SAE 009 LIN RCU CODESET INVALID! I1 1FR /TN
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1 DRS /TN
8825	ORDER ERR: DSA IDNT 009 LI DSA MUST APPEAR IN IDNT!
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1 DRS /TN
8825	ORDER ERR: ZLLU SAE 009 LI ZLLU MUST APPEAR!
8825	ORDER ERR: PKG SAE 010 LIN PKG NOT VALID ON THIS USOC! T1 1FB /TN
8825	ORDER ERR: RCU SAE 009 LIN RCU CODESET INVALID! I1 14R /TN
8825	ORDER ERR: CFND SAE 016 LI SEE SOER DOCUMENTATION! T1
8825	ORDER ERR: PKG SAE 010 LIN PKG NOT VALID ON THIS USOC! T1 1FB
8825	ORDER ERR: PIC SAE 012 LIN PIC MUST APPEAR ON I AND T ACTION CODED CATEGORY D USOC!
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: FORMAT SAE 389 I1 DRS /TN
8825	ORDER ERR: ZLLU SAE 009 LI ZLLU MUST APPEAR!
8825	ORDER ERR: NLST LIST 013 L SEE SOER DOCUMENTATION! INLST(NON-LIST) INTERPRINT EQUI
8825	ORDER ERR: LN LIST 010 LIN SEE SOER DOCUMENTATION! ILN
8825	ORDER ERR: RCU SAE 009 LIN RCU CODESET INVALID! I1 14R /
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!

AGGREGATE ORDER TYPES

ERROR DETAILS - 8825

Error Type (by error code)	Error Description
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: SS BILL 007 LIN SS DATA FORMAT INCORRECT! ISS
8825	ORDER ERR: SIC LIST 012 LI SIC CODE NOT ON BRIS SIC TABLE! ISIC 3047
8825	ORDER ERR: RESH BILL 023 L USOC BSX++ MAY NOT APPEAR!
8825	ORDER ERR: NP LIST 010 LIN SEE SOER DOCUMENTATION! INP (NON-PUB)
8825	ORDER ERR: NP LIST 010 LIN SEE SOER DOCUMENTATION! INP (NON-PUB)
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA
8825	ORDER ERR: FORMAT 374 LINE EUCLC: 0001 RELAY: 0000=
8825	ORDER ERR: ADL SAE 010 LIN ADL MUST APPEAR! I1
8825	ORDER ERR: LOC LIST 019 LI INVALID LAST CHARACTER FOR LEVELS 1-3! ILOC LOT 4 DES (
8825	ORDER ERR: SA LIST 023 LIN STREET NAME FOR SA NOT VALID FOR NPA NXX!
8825	ORDER ERR: NP LIST 010 LIN SEE SOER DOCUMENTATION! INP (NON-PUB)
8825	ORDER ERR: NP LIST 010 LIN SEE SOER DOCUMENTATION! INP (NON-PUB)
8825	ORDER ERR: PR SAE 010 LINE ZERO MUST NOT APPEAR AS FIRST CHARACTER! I1 UEAC2 /C
8825	ORDER ERR: LCON SAE 007 LI LCON FORMAT INCORRECT! CKL
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: ROUT LIST 007 L ROUT INVALID ON THIS ORDER!
8825	ORDER ERR: TYA BILL 008 LI TYA REQUIRED WITH SIC CODE OF 98XX
8825	ORDER ERR: PKG SAE 010 LIN PKG NOT VALID ON THIS USOC! T1
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1
8825	ORDER ERR: TCP TFC 007 LIN INVALID TCP DATE! TCP 06-13-00
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: DSA IDNT 009 LI DSA MUST APPEAR IN IDNT!
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1
8825	ORDER ERR: ADL SAE 010 LIN ADL MUST APPEAR! I1 1FR /TN
8825	ORDER ERR: PCA SAE 013 LIN SEE SOER DOCUMENTATION! T1
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA

AGGREGATE ORDER TYPES

ERROR DETAILS - 1000

Error Type (by error code)	Error Description
1000	CLEARED ERR BY ISSUING ORDER MANUALLY
1000	CLEARED SYSTEM ERRORS OSCOL AND UEAMC
1000	CLEARED UP SYSTEM ERRORS
1000	CLEARED ERROR FOR SYSTEM GENERATED ORDER#
1000	CORRECTED SYSTEM GENERATED ERRORS FOR ORDER#
1000	CLEANED UP SYSTEM ERRORS
1000	CANCEL PER CLEC.
1000	PUT IN E STATUS TO DROP OFF-ORD CANCELLED BY CLEC
1000	CLEARED ALL SYSTEM ERRORS IN DUE DATE CHANGE BY SYSTEM TO 070700
1000	ORDERDD 06-27-00 WORKED TO CHG LISTING
1000	PLACED IN E-STAT SUP 1 ON VER 1 THANKS
1000	ERR PLACED IN E-STAT SUP 1
1000	ERR CLEARED-ORDER ISS TO PROVIDE 1 LOOP
1000	CORRECT SYSTEM ERRORS
1000	CAN PER CLEC
1000	ERROR TO DROP, PON CANCELLED PER SUP 01
1000	EU NAME IS INCOMPLETE, PLS VERIFY AND RESUBMIT;
1000	CLEAN UP SYSTEM ERROR AND ADD SHELVES TO LOC FLR INFO
1000	CORRECTED SYSTEM ERRORS FOR ORDER#
1000	CORRECTED ERRORS ON ORDER BY REMOVING OCOSL & UEAMC WHICH SHOULD NOT BE ON LY-- REQUEST
1000	CLEARED ERROR FOR SYSTEM GENERATED ORDER, ORDER #
1000	ERROR TO DROP, UNABLE TO FORCE FOC ON C51RKDT0 CPX 06-08-00..
1000	ACCOUNT , SERVICE ORDER, DD 06-30-00
1000	ERROR TO DROP, UNABLE TO FORCE FOC ON
1000	CANCELLED ORDER PER SUP 1 LESOG
1000	CORRECT MAN CODE ON ROUTING ERROR MADE BY SYSTEM
1000	RECVD SUP 1 TO CANCEL
1000	CORRECT SYSTEM ERROS
1000	ERR PLACED IN E-STAT SUP 1 ON VER 1
1000	UPDATE TO CHANGE DUE DATE TO 6-27
1000	ERR PLACED IN E-STAT ORDER COMPLETED
1000	CLEARED ERR FOR ORDER # , PON#,

AGGREGATE ORDER TYPES

ERROR DETAILS - 1000

Error Type (by error code)	Error Description
1000	CORRECT SYSTEM ERRORS
1000	CORRECT SYSTEM ERRORS
1000	CLEARED ERROR FOR SYSTEM GENERATED ORDER #
1000	CLEARED ERROR
1000	CORRECT SVC ORDER BY REMOVING OCOSL & UEAMC-WHCH SHOULD NOT BE ON LY-- RQST
1000	CORRECT ERRORS
1000	CORRECTED SYSTEM GENERATED ORDERS, ORDER#
1000	CORRECTED SYSTEM GENERATED ORDER #
1000	SENT S STATUS REFERAL FORM 06-20-00.
1000	ISS ORD C509GNJ6 DD 0703 ERR STAT 2 COR FOC-
1000	DD 2000-07-05
1000	ORDER CANCELLED
1000	CLAIMED IN ERROR
1000	ORDER PLACED IN ERROR BUCKET. RECORD ORD CPX B4 FOC WAS SENT.
1000	DD 06-14-00
1000	DD 07-06-00
1000	ORDER NY32B0F8 DOES NOT HAVE PON ON IT..
1000	DD 2000-07-05
1000	CORRECT SYSTEM ERRORS
1000	CLEAR UP SYSTEM ERRORS
1000	ERR TO DROP OFF, ORD
1000	ERR CLEARED-ORDER ISS TO PROVIDE 1 LOOP
1000	CORRECT SYSTEM ERRORS
1000	CORRECT SYSTEM PROBLEMS
1000	CLEARED UP SYSTEM ERRORS
1000	CLEARED ERRORS FROM ORDER TO FLOW THRU
1000	CLEAR SYSTEM ERRORS OCOSL AND DFDT
1000	CORRECT ON ODR NUMBER
1000	ORDER BY PLACING DFDT INFO IN PROPER PLACE AND REMOVING OCOSL (NOT VALID ON LY--ORDER)

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-39

This sheet transmits the

Flow-Through Improvement Task Force Notification to CCP Membership

which consists of 3 pages.

From: Control, Change

To: Alan.Flanigan@twtelecom.com; Andrew.Broder@lightyearcom.com; Annette.Cook@espire.net; annettey@Lightyearcom.com; apatel3@telcordia.com; ASamson@birch.com; AZerillo@birch.com; BellSouth@quintessent.net; best2@surfsouth.com; billg@telcordia.com; blsinterfacecontrol@kpmg.com; bmurdo@KMCTELECOM.com; bobik@att.com; bradbury@att.com; brutter@kpmg.com; bszafran@covad.com; bwellman@idstelcom.com; c_and_m@bellsouth.net; carl.taylor@lecstar.com; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cchiavatti@usatelecominc.com; cecilia.ortiz@adelphiacom.com; cflanigan@uslec.com; changecontrol.bellsouth@onepointcom.com; Chapmanwe@cepb.com; charrison@mpowercom.com; chaynes@trivergent.com; cheryl@eatel.com; cheryl_acosta@stratosoilandgas.com; chrisg@pvtel.net; christine.shelton@cc.gte.com; clhawk@kmctelecom.com; CoDavis@covad.com; colleen.e.sponseller@wcom.com; Connie@albionconnect.com; conniec@arrowcom.com; Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com; csti@bellsouth.net; daddymax@netbci.com; david.burley@wcom.com; DDougherty@birch.com; Debra.Pasquale@btitele.com; default.user@bellsouth.com; DElliott@connectsouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dgraham@mantiss.com; dkane@aspiretelecom.com; dlasher@eftia.com; dmcmanus@Trivergent.com; DoBeck@MediaOne.com; don@amexcomm.com; donnas@intetech.com; Doreen.E.Raia@wcom.com; dpetry@ix.netcom.com; drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.gte.com; EFarnell@broadband.att.com; EGunn@birch.com; Ellen.Neis@mail.sprint.com; Elliot.Wrann@dsl.net; eodell@dset.com; epadfield@nextlink.com; ESaeed@northpoint.net; ESingleton@eztalktelephone.com; evdoty@nextlink.com; Faye.Restaino@dsl.net; fjohnson@covad.com; frankb@cellone-ms.com; Gary@CSII.net; generalg@cris.com; george@accesscomm.com; gerrig@Lightyearcom.com; Glenn.Sonnier@usunwired.com; gulfcoast@dotstar.net; heidi.a.crow@mail.sprint.com; Hwhittington@mpowercom.com; jason.estep@adelphiacom.com; jayala@rhythms.net; jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc; JDuffey@PSC.STATE.FL.US; Jeff.Walker@accesscomm.com; jfuller@fairpoint.com; JG6837 @ctmail.snet.com; jhoze@kmctelecom.com; jim.lee@dsl.net; Jim.Meyers@wcom.com; jjohnson@idstelcom.com; jmclau@kmctelecom.com; JMMaxwell@Intermedia.com; jnovo@mpowercom.com; JoanC@networktelephone.net; joanneb@networktelephone.net; JOliver@birch.com; jrwilliamson@att.com; JtWilson2@att.com; JWilwerding@birch.com; karen.grim@mail.sprint.com; karind@covad.com; Katherine.Hudler@espire.net; Kathryn.Phipps@btitele.com; kcooper@EFTIA.com; kelley.dunne@onepointcom.com; Kevin@albionconnect.com; khudson@nextlink.com; Kimberly.O.Williams@mci.com; KKester@STIS.com; kmarshall@telstar.org; kmiller@northpointcom.com; KPollard@birch.com; kschwart@covad.com; KUchida@northpoint.net; launch-now.notify@cscoe.accenture.com; lavernek@arrowcom.com; ldavidov@dset.com; lgriffi@Lightyearcom.com; lhall@floridadigital.net; LHinton@PrismCSI.net; linda@networkonecom.com; lisa@annox.com; Lminasola@mediaone.com; Lorraine.Watson@wcom.com; lynn@mfn.net; Mandy.S.Jenkins@alltel.com; mark@annox.com; Mark.Mecca@dsl.net; marybethkeane@kpmg.com; mcbrunnhilde@juno.com; mconquest@itcdeltacom.com; mdominick@Trivergent.com; mer@networkwcs.com; michael.dekorte@Lightyearcom.com; Michelle.Boger@lightyearcom.com; Micki.Jones@wcom.com; microsun@bellsouth.net; mike.norris@mindspring.com; mmclaughlin@dset.com; MPatyk@connectsouth.com; msykes@telcordia.com; mt7210@momail.sbc.com; Nancy.Watt@RHTelCo.com; ngiugno@kpmg.com; Nicole.Moorman@Adelphiacom.com; PBarker@aol.com; PBohn@Mediaone.com; Pkinghorn@eztalktelephone.com; PPinick@birch.com; prehm@nightfire.com; prichardson@Trivergent.com; rbennett@floridadigital.net; rbreckin@telcordia.com; rbuffa@interloop.net; Rdupraw@mpowercom.com; Renee.Clark@espire.net Renee.Clift@dsl.net; reym@networktelephone.net; rhonda.calvert@adelphiacom.com; robert@alternativephone.com; Ronald.Klamer@wcom.com; ronald.l.thompson@xo.com; rpwhite@z-tel.com; rszczepanski@kpmg.com; ruth@mfn.net; sandra.k.evans@mail.sprint.com; sandra.k.evans@openmail.mail.sprint.com; Sandrajf@intetech.com; sangelo@bellsouth.net; sbowling@caprock.com; schula.hobbs@dsl.net; Selange.Roberts@espire.net; shane@eatel.com; sharon.arnett@mail.sprint.com; sharon.russo@btitele.com; sjenning@nowcommunications.com; SLively@Trivergent.com; smason@interloop.net; smoore@Trivergent.com; smurray@rhythms.net; snole@kpmg.com; srober@kmctelecom.com; ssmith@dset.com; SStapler@itcdeltacom.com; steve.taff@allegiancetelecom.com; suee@Lightyearcom.com; svc-gate@telcordia.com; swargo@rhythms.net; Taldinger@mpowercom.com; talleylinda@mindspring.com; tami.m.swenson@accenture.com; Tanya.Finney@espire.net; TAYLORJG@LCI.COM; timw@networkonecom.com; Tindal, Travis; TJStokes@Trivergent.com; TLA@MAGICNET.NET; tmontemayer@MANTISS.com; Todd@CSII.net; trsmith@trivergent.com; ts1336@sbc.com; TThompson2@broadband.att.com; Tyra.Hush@wcom.com; usfloridaoss@kpmg.com; wendy.hernandez@rhtelco.com; Williamsal@cepb.com; wmknapek@Intermedia.com; wolfsbrg@cris.com; Yvette.Brown@espire.net; nperrio@kpmg.com; amanda.hill@wcom.com; Fred.Brigham@wcom.com; lijohnso@covad.com; tnphone@home.com; cbnaadmin@home.com; Christine.Schnelle@wcom.com; caren.schaffner@wcom.com

RICH TEXT Dated: 2/15/01 at 15:52
Subject: SEND CCP: Flow Through Improvement Task Force Size: 1303 bytes
Creator: Change Control /m6,mail6a

Attention CLECs:

Please see the attached regarding the Flow Through Improvement Task Force.

If you have any questions, please let us know.

Thanks,
Change Control Team

February 13, 2001

TO: CLECs

FROM: BellSouth Telecommunications

RE: Flow Through Improvement Task Force

The GA PSC has ordered the formation of a joint BellSouth – CLEC Flow Through Improvement Task Force. BellSouth would like to recommend that this Task Force operate as a subcommittee of the Change Control Process (CCP). BellSouth would like to initiate this Task Force at the February 28, 2001 CCP meeting. The objective of this Task Force is to work jointly on efforts which will enhance electronic order flow through, document those enhancements, and develop an implementation schedule. The subcommittee's first progress report is due to the Georgia PSC on April 12, 2001.

Please be prepared in the 2/28 CCP meeting to name your representative on this Flow Through Improvement Task Force. As always, feel free to identify features you believe will improve flow through and submit them as Change Requests. Please plan to submit any flow through improvement features already identified by 2/28 so they can be included with BellSouth's in the March 31 CCP prioritization meeting. Your suggestions and ours will follow the normal CCP procedures.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-40

This sheet transmits the

Florida Public Service Commission Staff Supplemental Interrogatory Item No. 37

which consists of 4 pages.

REQUEST: In the direct testimony of Mr. Bradbury on page 92, there is a discussion about the long interval between the point of ALEC orders falling out and point at which ALEC orders are claimed for handling by an LCSC representative. Please explain.

RESPONSE: Mr. Bradbury is attempting to describe the time interval between when it is determined that an electronically submitted order requires manual handling, and the point when that order is actually claimed by a BellSouth service representative for handling. The target that BellSouth has been using is that orders that fall out should be handled within 48 hours. Therefore, it should be no surprise that Mr. Bradbury's "study" shows average times of 29 to 40 hours. Those figures show that, on average, BellSouth is actually handling these calls more quickly than its targeted interval. The issue that Mr. Bradbury really wants to discuss is whether BellSouth should have a target of less than 48 hours to handle these orders that fall out for manually handling.

As an initial matter, BellSouth would note that this issue is one that really addresses the question of whether AT&T is receiving nondiscriminatory access to BellSouth's systems and whether AT&T has a meaningful opportunity to compete. As such, this issue is properly the subject of the generic performance measures docket that the Florida PSC has established. The issue of whether a target time of 48 hours to handle orders that fall out for manual handling is a question that affects all ALECs. For instance, if AT&T's orders had to be handled in 24 hours, that would simply take resources away from the orders submitted by other ALECs. That is why all of the performance measures issues in this proceeding have been deferred by the parties to the performance measures docket.

Moving beyond that, it should be noted that Mr. Bradbury is addressing a situation that only applies to a very small portion of the orders placed. The following chart provides information relevant to this topic using the two months referenced in Mr. Bradbury's testimony.

RESPONSE: (Cont.)

Month	Total Mech LSRs	Total Manual Fallout	Percent of Mech LSRs	Total System Fallout (errors)	Percent of Mech LSRs
May	236,127	19,316	8.2%	25,059	10.6%
June	280,567	27,010	9.6%	31,913	11.4%

Thus of the electronically submitted LSRs, only a minority required intervention by the LCSC. For the month of May it was a total of 18.8% and for June 21.0%.

So, and again, the real issue is whether the 48-hour target is reasonable or not. BellSouth is clearly, according to Mr. Bradbury's data, not only meeting the target but also exceeding it. The question that Mr. Bradbury wants the Commission to address, outside of the performance measures docket, where this issue ought to be, is whether the 48-hour period should be shorter.

With regard to that issue, BellSouth would make two points. First, the processing of these transactions is resource intensive.

Over the past year the amount of LSR volume has increased dramatically as can be seen by the below table.

Month	Electronically Submitted LSRs	Manually Submitted LSRs	Total LSR Submissions
Nov 99	119,035	98,805	217,840
Dec 99	141,357	82,093	223,450
Jan 00	174,336	73,152	247,488
Feb 00	178,745	71,815	250,560
Mar 00	193,079	65,989	259,068
Apr 00	175,396	63,315	238,711
May 00	236,127	66,065	302,192
Jun 00	280,567	68,509	349,076
Jul 00	260,965	62,697	323,662
Aug 00	302,542	67,098	369,640
Sept 00	270,126	57,143	327,269
Oct 00	345,834	47,961	393,795
Nov 00	302,045	51,192	353,237

RESPONSE: (Cont.)

As one can determine, Total LSR Submissions grew by 62% from November 1999 to November 2000. The table also reflects a shift in electronic submissions. The result of this is the remaining manual submissions are typically more complex transactions that can not be submitted electronically. BellSouth has continually added employees to aid in the effort to work manual orders and is in the process of opening a third LCSC, located in Jacksonville, Florida. Nevertheless, it requires a lot of trained people to handle these transactions, and it takes time to get to all of them. Moreover, the fact that the remaining transactions are more complex means that even though they appear to be fewer in number, the fact that they are more complex means they take more time.

Second, BellSouth has not merely accepted the 48-hour target that it has used in the past. BellSouth has measures that demonstrate that it is attempting to shorten the time interval even now. For example, where previously the target was 48-hour turnaround, the benchmarks established as part of the evaluation criteria for 3rd Party Testing in Florida are:

Reject Interval	85% < 24 hours
FOC Timeliness	85% < 36 hours

This raises an additional point. You will note that Mr. Bradbury did not explain how his figures were calculated in his testimony. While his average times ranges from 29 to 40 hours, those numbers could well have been driven by isolated instances where problems prevented more timely responses. No conclusions should be drawn about Mr. Bradbury's calculations without understanding the underlying figures he has used to reach his conclusions.

RESPONSE: (Cont.)

The BellSouth Operations Support Systems (OSS) and supporting manual processes have been designed to meet the Reject and FOC Timeliness intervals based on the above metrics. BellSouth is committed to such and has added additional resources to the LCSC throughout 2000. Thus, BellSouth stands ready to provide the operational processing for manually submitted LSRs plus manual intervention for the minority of transactions that fall out either by design or due to errors. The best venue that will demonstrate these results in response to Mr. Bradbury's allegations will be the 3rd Party Testing that has been ordered and will be managed by this Commission.

RESPONSE PROVIDED BY:

Ron Pate
Director
675 West Peachtree Street
Atlanta, GA 30375

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-41

This sheet transmits the

BellSouth/AT&T Flow-Through Correspondence

which consists of 8 pages.

BELLSOUTH

BellSouth Interconnection Services
Suite 200
1960 West Exchange Place
Tucker, GA 30084

AT&T Regional Account Team

770 492-7550
Fax 770 492-9412

JAN 2001
RECEIVED
Federal Regulatory
ATLANTA

January 31, 2001

Mr. K. C. Timmons
AT&T
1200 Peachtree St. NE
Room 12227 Promenade I
Atlanta, Ga. 30309

Dear K. C.:

This is in response to your January 16, 2001 letter, regarding BellSouth's performance on Firm Order Confirmation (FOC) Timeliness Partially Mechanized CLEC and FOC Timeliness Non-Mechanized CLEC based on the data provided via the Performance Measurement and Analysis Platform (PMAP) system.

According to BellSouth's analysis of its FOC Partially Mechanized performance, a negative sloping trend was found from June 2000 to October 2000; however, the analysis also shows a positive sloping trend from October 2000 through December 2000. Using Attachment 1 from AT&T's January 16, 2001 letter, analysis shows an 88% increase in performance during the most recent three-month period. Although BellSouth did not meet the benchmark of 85% of orders with FOCs within 48 hours through November 2000, the December 2000 data reveals a 95% performance, which exceeds the benchmark in this category.

BellSouth also conducted analysis of its FOC Non-Mechanized performance and although a negative trend was found from June 2000 to November 2000, BellSouth's December 2000 performance exceeds the 85% benchmark with a 98% performance of orders with FOCs within 48 hours. Again using AT&T's data from the January 16, 2001 letter (Attachment 3), the analysis shows an increase in performance during the most recent two-month period.

As a result of the positive results from BellSouth's analysis of its FOC Timeliness Partially Mechanized CLEC and FOC Timeliness Non-Mechanized CLEC based on the data provided via the PMAP system, process improvements are not currently being explored. Further, BellSouth's December 2000 PMAP results indicate that BellSouth surpasses the benchmarks on these two FOC categories.

In reference to BellSouth's performance based on benchmarks determined by the Georgia Public Service Commission (PSC) in Docket No. 7892-U, BellSouth will continue to strive to meet the PSC's guidelines and measurements. No analysis or process improvements will be discussed until the Commission's Order is in effect.

If you have any further questions, please contact me at 770-492-7554.

Sincerely,

Joy Jamerson

Joy Jamerson
AT&T Account Team

cc: Denise Berger

KC Timmons
Manager Supplier Performance Measurements
Local Services – Southern Region

Room 12227
Promenade I
1200 Peachtree St. NE
Atlanta, GA 30309
404 810-3914

January 16, 2001

Theresa Harris
BellSouth Interconnection Services
1960 West Exchange Place, Suite 200
Tucker, Georgia 30084

Dear Theresa:

The purpose of this letter is to request that BellSouth perform a root cause analysis on the Firm Order Confirmation (FOC) Timeliness Partially Mech CLEC and FOC Timeliness Non-Mech CLEC data available via the Performance Measurement and Analysis Platform (PMAP) system, as well as request that BellSouth indicate what process improvements will be taken in order to improve these deficient performance measures.

The chart in Attachment 1 shows BellSouth's FOC Partially Mechanized performance from June through November 2000 for the entire Southern Region. AT&T is extremely concerned with this poor performance. Not only is there a negative sloping trend of performance during the six-month period, but also none of the months' data shows BellSouth meeting its benchmark of 85% of orders FOC'd within 48 hours. October PMAP data showed the worst performance; with BellSouth only sending FOC's for 11.8% of the orders within 48 hours. Attachment 2 shows the same performance measure, but looks specifically at Georgia data. Once again, BellSouth did not meet its benchmark for any of the reported months, and performance deteriorated as the six months passed. BellSouth's FOC Timeliness performance hit a low in October when only 5.4% of the Partially Mechanized orders issued in Georgia were FOC'd within 48 hours.

Attachment 3 contains a chart displaying Non-Mechanized FOC Performance for the Southern Region during the same six-month period. Again, the BellSouth-reported data reveals declining performance between June and November. Additionally, during October and November, BellSouth was not able to meet the benchmark of 85% FOC's sent within 48 hours. Attachment 4 displays Georgia specific Non-Mechanized FOC Timeliness data. During November BellSouth FOC'd only 72.7% of the Non-Mechanized orders within 48 hours.

Although Georgia Docket 7892-U has not been published yet, the recommended benchmark in Georgia for Partially Mechanized FOC Timeliness will be 85% on time within 10 hours. The benchmark recommendation for Non-Mechanized FOC Timeliness in Georgia will be 85% within 36 hours. These benchmarks recommended by the Georgia Public Service Commission will be more stringent than the current

BellSouth benchmarks. Therefore, what improvements does BellSouth have in place in order to meet these newly proposed benchmarks? Additionally, why is it taking BellSouth longer to FOC Partially Mechanized orders than Non-Mechanized orders? AT&T expects Partially Mechanized orders to be FOC'd in a shorter amount of time than Non-Mechanized orders.

AT&T is requesting that BellSouth perform a root cause analysis in order to explain why FOC performance deteriorated over the six-month period between June and November 2000. Once this analysis is complete, AT&T is asking that BellSouth report on any process improvement plans that need to be implemented in order to improve FOC performance to meet the necessary benchmarks. It should be noted that the attached charts include data for all Operating Company Numbers (OCN's) reported for AT&T (e.g. 7421, 7680, 7125, etc.) in the Reports section of PMAP between June and November 2000.

Please provide a response to this request no later than close of business Friday, February 2, 2001. Because FOC Timeliness impacts the quality of AT&T's treatment of its end-customers, it is of vital concern that BellSouth improves its performance of FOC Timeliness for Partially Mechanized and Non-Mechanized orders.

Let me know if you have any questions or concerns.

Sincerely,

KC Timmons

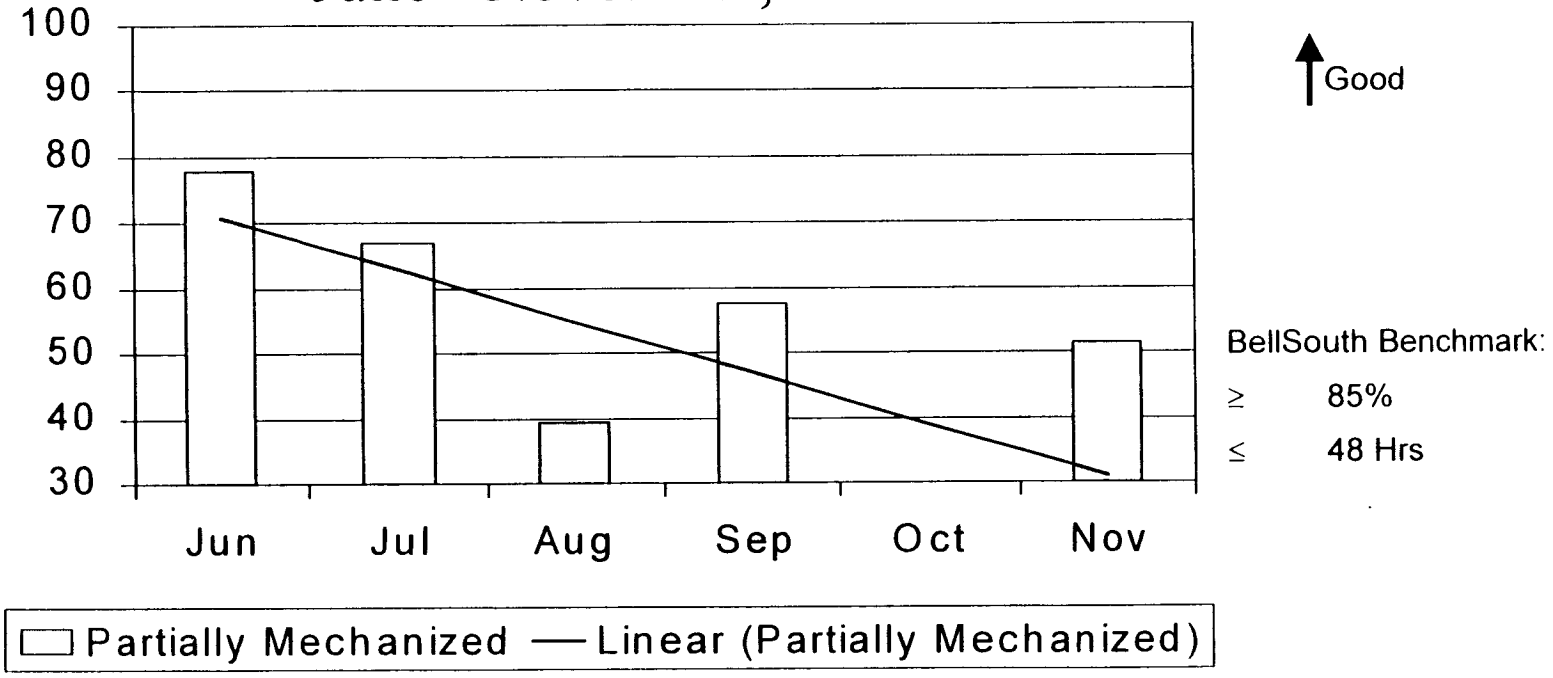
Copy to: Denise Berger

Attachment

ERT#53/01230101.DOC

Attachment 1 – Southern Region

Firm Order Confirmation (FOC) Performance
Partially Mechanized
June - November, 2000

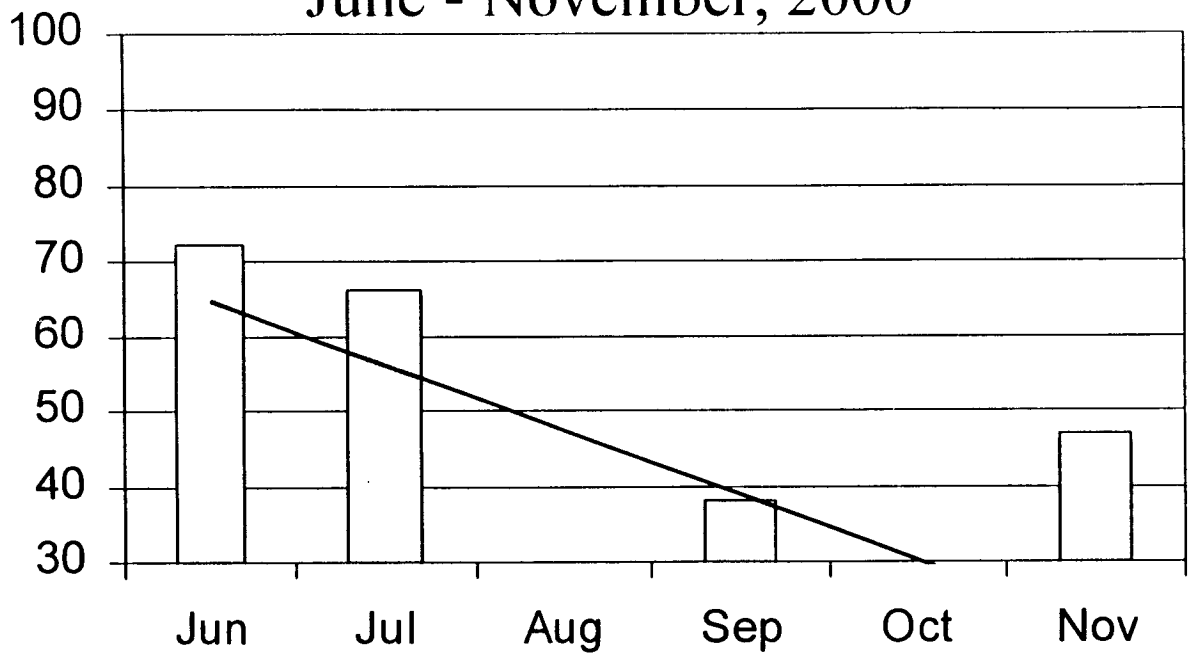


Partially Mechanized	June	July	Aug	Sep	Oct	Nov
% FOC'd < 48 Hours	77.9	67.1	39.34	57.63	11.8	51.65
Number of Orders	231	219	61	59	169	699

Attachment 2 - Georgia

Firm Order Confirmation (FOC) Performance
Partially Mechanized
June - November, 2000

GA Docket 7892-U
Benchmark:
≥ 85%
≤ 10 Hrs



Good

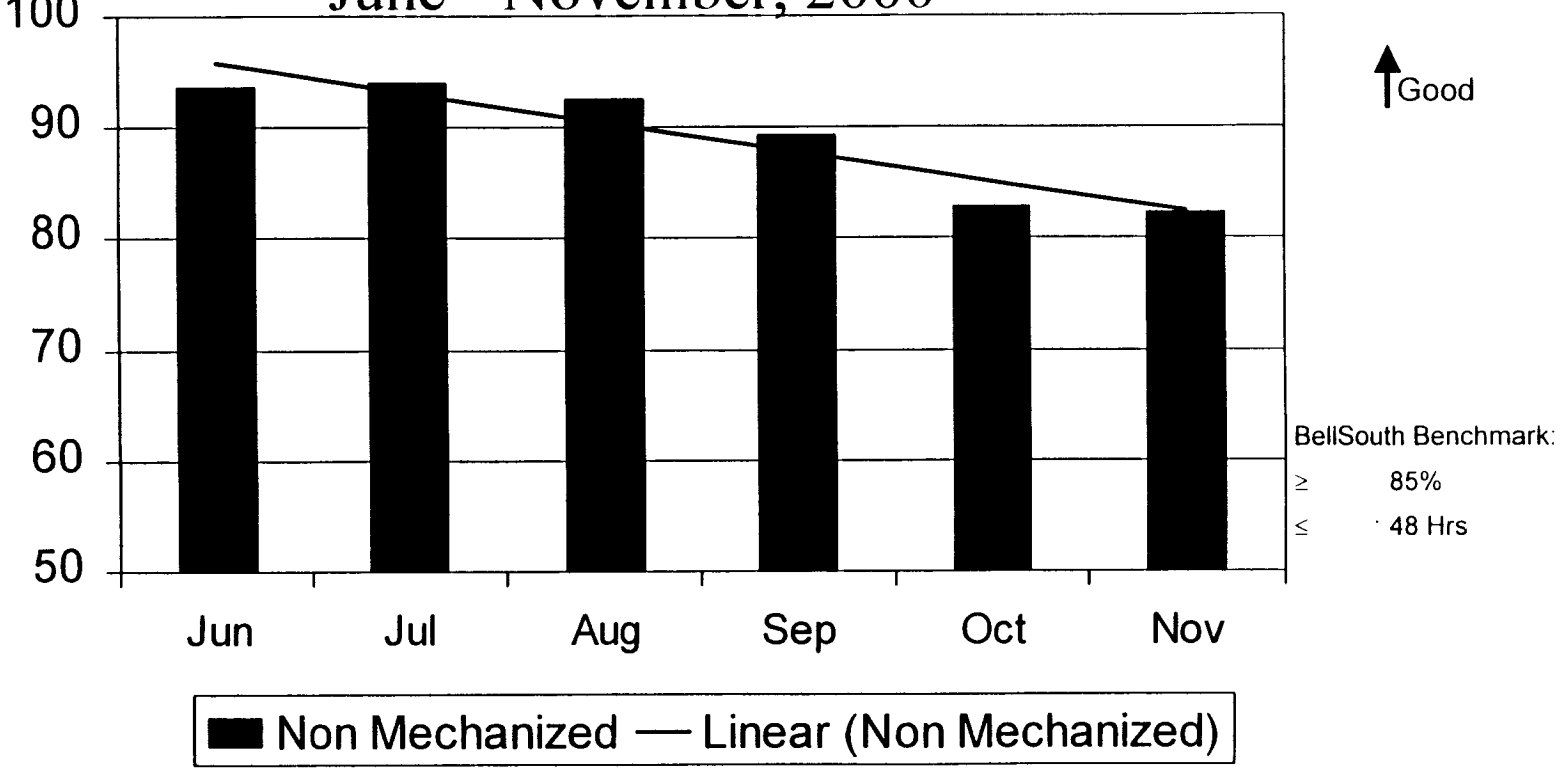
BellSouth Benchmark:
≥ 85%
≤ 48 Hrs

Partially Mechanized — Linear (Partially Mechanized)

% FOC'd < 48 Hours	June	July	Aug	Sep	Oct	Nov
Partially Mechanized	72.4	66.3	29.8	38.1	5.4	46.9
Number of Orders	134	193	47	21	130	582

Attachment 3 – Southern Region

Firm Order Confirmation (FOC) Performance
Non-Mechanized
June - November, 2000

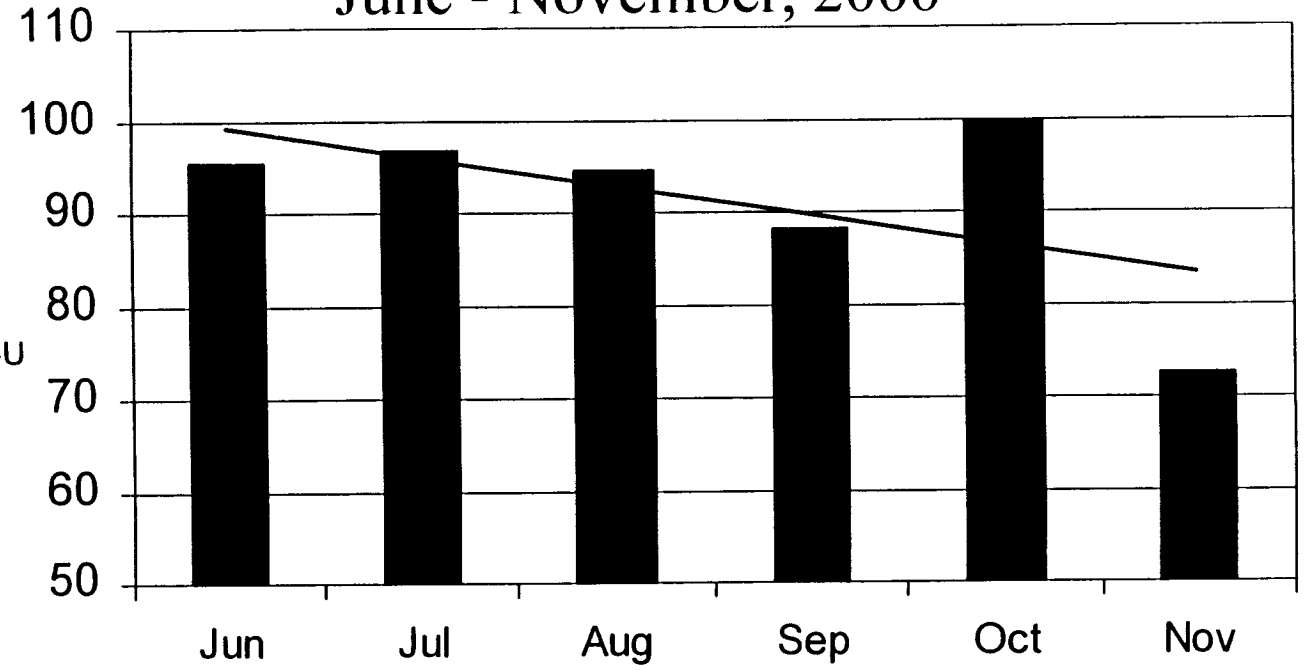


% FOC'd < 48 Hours	June	July	Aug	Sep	Oct	Nov
Non Mechanized	93.6	93.9	92.5	89.2	82.7	82.3
Number of Orders	985	946	1007	1231	52	62

Attachment 4 - Georgia

Firm Order Confirmation (FOC) Performance
Non-Mechanized
June - November, 2000

GA Docket 7892-U
Benchmark:
≥ 85%
≤ 36 Hrs



Good

BellSouth Benchmark:
≥ 85%
≤ 48 Hrs

Non Mechanized — Linear (Non Mechanized)

% FOC'd < 48 Hours	June	July	Aug	Sep	Oct	Nov
Non Mechanized	95.4	96.8	94.6	88.3	100	72.7
Number of Orders	388	347	261	299	6	11

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-42

This sheet transmits the

Change Request CR0012

which consists of 7 pages.

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Change Request Form

Internal Reference # _____(1) Date Change Request Submitted _4_/_18/_00(2)

☒ **TYPE 5 (CLEC)** ☐ **TYPE 4 (BST)** ☐ **TYPE 3 (INDUSTRY)** ☐ **TYPE 2 (REGULATORY) (3)**

☐ **TYPE 6 (DEFECT) (3A)**

Company Name____AT&T_____(4)

CCM___Jill Williamson_____(5) Phone__404-810-8562_____(6)

CCM Email Address _jrwilliamson@att.com_____(7) Fax____404-810-8605_____(8)

Alternate CCM_ _____(9) Alt Phone # _____(10)

Originator's Name __Jill Williamson_____(11) Phone__404-810-8562_____(12)

Title of Change __TAFI Functionality via ECTA Interface_____(13)

Category ☒ Add New Functionality ☐ Change Existing (14) Desired Due Date 10/01/00(15)

Originating CCM assessment of impact ☒ Major ☐ Minor ☐ None expected (16)

Originating CCM assessment of priority ☐ Urgent ☒ High ☐ Medium ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☐ LNP ☐ LENS ☐ TAG	☒ Maintenance ☐ TAFI ☒ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☒ Software	☐ Hardware	☐ Industry Standards	☐ Defect
☐ Product & Services	☐ New or Revised Edits	☐ Process	
☐ Documentation	☐ Regulatory	☐ Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

The existing ECTA Interface is designed to allow integration with a CLEC's own trouble reporting/administration system but provides only a limited set of functionality to CLECs and requires human intervention by BellSouth personnel to resolve all troubles. The TAFI system provides a much broader range of functions and allows many trouble reports to be resolved without human intervention by BellSouth personnel, but is human-to-machine in design when used by a CLEC. Thus a CLEC using TAFI must perform dual entry of its customers troubles and trouble resolutions in order to keep its own various customer records up to date.

In April of 1996 AT&T requested that BellSouth make the TAFI functionality available over the ECTA interface which would provide a fully featured and integrated interface reducing costs and improving customer service for both CLECs and BellSouth. The request has been open since then and has been discussed in many regulatory proceedings. BellSouth's representatives have repeatedly stated that such

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an interface is both desirable and technically feasible. In discussions before the FCC Staff in December 1998, BellSouth's representative stated that it could provide initial functionality in 13 months and complete functionality in 18 months. In the subsequent 15 months BellSouth has offered no TAFI functionality via the ECTA interface.

AT&T requests all TAFI functionality described in the TAFI User's Guide be provided via the ECTA interface. These functionalities include but are not limited to the following:

(i) enter a new end user trouble ticket into the BellSouth maintenance system for an AT&T end user;
(ii) retrieve and track current status on all AT&T end user repair tickets;
(iii) receive "estimated time to repair" ("ETTR") on a real-time basis;
(iv) receive timely notification in the event a repair person is unable to be present for, or anticipates missing, a scheduled repair opportunity;
(v) retrieve all applicable time and material charges at the time of ticket closure (itemized by time spent, price of materials used, procedures employed, amounts incurred in each subcategory, and total by end user, per event);
(vi) perform an electronic test at the time of ticket entry and provide test results to AT&T;
(vii) display products and services that are programmed on a line or port;
(viii) view pending orders associated with a line, port or circuit;
(ix) view the LMOS trouble report;
(x) query and view the current central office translations associated with a line or port;
(xi) view both abbreviated and extended trouble histories for a line, port or circuit;
(xii) view customer line record in LMOS; and
(xiii) add or delete features to a central office line or port.

Known dependencies (21)

_____

_____

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

_____

This Section to be completed by BCCM only.

Change Request Log #_____CR0012_____(23) Clarification ☐ Yes ☐ No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status ___N_____(27)

Change Request Review Date __/__/__(28) Target Implementation Date ___/___/__ (29)

Last Modified By _____BCCM_____ (30) Date Modified 06/29/00_ (31)

Defect Validation Results: (32)

_____

_____

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Change Request Form

Change Review Meeting Results (33)

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received

☐ Cancellation by BellSouth (34) _____

Cancellation Acknowledgment CLEC _____ BST _____ Date _____ (35)

Request Appeal ☐ Yes ☐ No (36)

Appeal Considerations (37)

Agreed Release Date ___/___/___ (38)

CMVC #_____(39)
DDTS#_____(40

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.

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Change Request Form

Response to CR0012: TAFI Functionality via ECTA Interface

AT&T Local (the CLEC) initiated production utilization of the BellSouth ECTA interface on March 18, 1998. On April 9, 1998 AT&T Local terminated the use of this interface. Therefore, since AT&T Local is not an active ECTA user, this Change Request is not valid (e.g., only CLECs using the specific OSS interface can request a change in that interface).

AT&T Local has recently expressed some interest in resuming the utilization of ECTA and a technical review meeting is scheduled for May 4, 2000. Should AT&T Local resubmit this request after resuming the use of ECTA, it would not be accepted for the following reasons:

1. By design, TAFI and ECTA are functionally dissimilar systems. Specifically, TAFI is a real-time, artificial intelligence based, interactive man-to-machine interface that guides the user to efficiently processes non-designed telephone number based plain old telephone service (POTS) trouble reports. It was designed by BellSouth to improve customer service by mechanically performing the traditional screening function, and in many cases actually resolving the reported trouble condition, while the customer is still on the line. CLECs have had parity access to TAFI since March 28, 1997. TAFI does not require that a CLEC perform "dual entry" of customer troubles. The CLEC is responsible for determining the best method for maintaining its customer records. In 1999, 37.5% of all CLEC POTS trouble reports were entered by CLEC users into LMOS via TAFI. BellSouth has not received complaints about "dual entry" from any CLECs using TAFI.

2. BellSouth supports various National Standards for the mechanical exchange of information and ECTA is built on the ANSI standards T1.227, T1.228 and T1.262. These standards were defined by the Electronic Communications Implementation Committee (ECIC) for the exchange of maintenance and repair data. This "standard" interface mimics the traditional two-step repair process utilized in BellSouth prior to TAFI (and is still used by many ILECs). Specifically, [step 1] the customer contacts a call receipt center to report their problem and a repair attendant enters the report in the appropriate legacy system. The report is routed by the legacy system to the correct maintenance center where [step 2] a maintenance administrator determines the next course of action. The ANSI standards upon which ECTA is built do not support gathering all of the various data elements listed in this request nor do they support the real time interactive man-to-machine interface necessary to deliver true "TAFI functionality."

3. If AT&T requires additional functionality, ECIC needs to develop the appropriate standard methodology prior to BellSouth's consideration. For example, AT&T (along with other CLECs) requested the ability to run a MLT test on a POTS line (and obtain the results) without generating a trouble report. BellSouth took the lead at ECIC and helped develop ANSI standard T1.262 to provide this functionality. Effective October 28, 1999, the BellSouth ECTA gateway supports this added functionality. Currently at ECIC there is a team evaluating the methodology for delivering trouble history data. Once this becomes a "standard", BellSouth will consider adding it to the system. In other words, the vehicle for adding functionality to ECTA is by obtaining an ECIC standard methodology and not the BellSouth Change Request process. (If CLEC using ECTA wanted to reformat the returned data (i.e., screen out certain AVCs), then the BellSouth Change Request process would be applicable.)

4. The aforementioned ANSI standards prevent BellSouth from providing TAFI functionality via ECTA.

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As previously indicated to AT&T before the FCC Staff in December 1998, upon implementation of a Bona Fide Request (BFR) from AT&T, BellSouth can develop a **non-standard** integrated gateway interface that will provide the various data elements and processing logic that emulate TAFI functionality. This interface would be an enhancement to our TAG API and, if pursued today, it would be delivered via the Corporate Gateway. To date, BellSouth has received no BFR from AT&T requesting this type of interface. The 13 and 18 month timelines referenced by AT&T in this request were based upon AT&T's timely submission of a BFR to BellSouth for a new, non-standard interface. BellSouth has made no assertions about enhancing ECTA to support TAFI functionality.

AT&T's list of TAFI functionalities is individually addressed below:

Note: TAFI today only processes POTS line trouble reports (and port/loop combos are treated as POTS) while ECTA will enter reports for all services (non-designed and designed services).

(i) enter a new end user trouble ticket into the BellSouth maintenance system for an AT&T end user;
TAFI and ECTA provide this function today

(ii) retrieve and track current status on all AT&T end user repair tickets;
ECTA today proactively returns status change messages to the Manager (AT&T's gateway) every time the status of an existing trouble ticket changes. The TAFI user must request status information manually by generating a subsequent report.

(iii) receive "estimated time to repair" ("ETTR") on a real-time basis;
TAFI and ECTA provide this function today.

(iv) receive timely notification in the event a repair person is unable to be present for, or anticipates missing, a scheduled repair opportunity;
AT&T was informed during recent Interconnection Agreement contract negotiations that this item is not a mechanized process and is handled via the OU (Operational Understanding agreement). TAFI has never done this and it is not listed in the TAFI User's Guide.

(v) retrieve all applicable time and material charges at the time of ticket closure (itemized by time spent, price of materials used, procedures employed, amounts incurred in each subcategory, and total by end user, per event);
During the initial ECTA JIA negotiations in 1997 AT&T was informed that this capability does not exist in BellSouth. There is no mechanical way to capture this data at the time of ticket closure and BellSouth does not perform this function for its own customers. AT&T has been informed during recent Interconnection Agreement contract negotiations that item is not a mechanized process. TAFI has never done this and it is not listed in the TAFI User's Guide.

(vi) perform an electronic test at the time of ticket entry and provide test results to AT&T;
TAFI will perform a MLT test if the trouble reported is a testable trouble (i.e., no dial tone). The results of the test will drive the resolution path for the report. The TAFI user could view the test results but doing so does not alter the processing of the report. ECTA (today) will also run an MLT test on a testable POTS report and will use the results to process the report. The VER code from the MLT test is also provided to the CLEC via an AVC. In addition, the CLEC today can request an MLT test and obtain the full test results without generating a trouble report (i.e., support for T1.262)

(vii) display products and services that are programmed on a line or port;

TAFI will display the Service and Equipment (S&E) section of the CRIS record listing which products and services are provided by BellSouth. ECTA does not. AT&T's system should list what products and services AT&T sold end user customer (and some may have been provided by an alternate provider).

(viii) view pending orders associated with a line, port or circuit;
TAFI will display pending service orders associated with a POTS line (or port/loop combination) when a trouble report is generated against the telephone number. The TAFI User's Guide does not state that TAFI will display pending orders for ports or circuits. ECTA does not provide this functionality today.

(ix) view the LMOS trouble report;
TAFI does provide a view of the LMOS TR screen but viewing this does not alter processing the report since all of the values are displayed in TAFI. Since the ECTA interface translates the ANSI standard codes into BellSouth codes, it would not be appropriate to display any legacy system information directly via this interface.

(x) query and view the current central office translations associated with a line or port;
TAFI will automatically query central office translation if the reported trouble is feature related. If a discrepancy between the switch translations and the CRIS record are found, TAFI will automatically correct the translations to match CRIS data. Querying central office translation is not available on demand. The ability to do this is part of the mechanized screening function is built into TAFI. By current standards, ECTA is limited to just entering the report, modifying an existing report, canceling a report and obtaining status information about the report.

(xi) view both abbreviated and extended trouble histories for a line, port or circuit;
TAFI will obtain and display both the DATH and DLETH history data from LMOS for a POTS line. The TAFI User's Guide does not state that TAFI will display trouble history data for ports or circuits. ECTA does not provide this functionality today. This issue is being worked at ECIC.

(xii) view customer line record in LMOS; and
TAFI provides the ability to view the LMOS line record (DLR) so that if a field technician were to call a BellSouth repair center for a specific cable and pair assignment, the BellSouth representative could provide this data without referring the technician to some other resource. For parity considerations, everything that a BellSouth user can see, a CLEC user can see in TAFI. However, since it is not part of BellSouth's maintenance process for a BellSouth technician to a CLEC to learn about BellSouth cable and pair assignments, the CLEC has no need for this information.

(xiii) add or delete features to a central office line or port.
TAFI will correct central office translation only when associated with a specific trouble report as described in number x. Adding or deleting features can only be done via the service order process. The ability to correct translation data is part of the mechanized screening function built into TAFI. By current standards, ECTA is limited to just entering the report, modifying an existing report, canceling a report and obtaining status information about the report.

In summary, based on the reasons stated above, this request is not accepted by BellSouth. By design, TAFI and ECTA systems are significantly different. ECTA is by definition and requirement a T1M1 standard, which does not support TAFI functionality.

There are several options available to AT&T:

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1. AT&T could work through ECIC to provide a standard methodology to obtain additional data not currently supported and then BellSouth would evaluate implementing the new "standard" in ECTA. As stated in our response, BellSouth took the lead at ECIC for the development of the T1.262 standard (giving CLECs the ability to obtain a MLT test without generating a trouble report).
2. AT&T could submit a BonaFide Request (BFR) asking for a "non-standard" machine-to-machine interface that emulates TAFI functionality. BellSouth would price and bill AT&T for any developments.
3. AT&T could use TAFI for TAFI functionality.

STATE OF Florida

COUNTY OF Leon

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared John A. Ruscilli, Senior Director, 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 "The Petition by AT&T Communications of the South Central States, Inc., and TCG of Ohio for Arbitration of Certain Terms and Conditions of a Proposed Agreement with BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252," Commission Case No. 2000-465, and if present before the Commission and duly sworn, his rebuttal testimony would be set forth in the annexed transcript consisting of 38 pages and 0 exhibit(s).

John A. Ruscilli

SWORN TO AND SUBSCRIBED BEFORE ME this
14th day of Feb, 2001.

Tanya W. Lynn
NOTARY PUBLIC

Tanya W. Lynn
MY COMMISSION # CC673581 EXPIRES
September 8, 2001
BONDED THRU TROY FAIN INSURANCE, INC.

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF JOHN A. RUSCILLI

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

DOCKET NO. 2000-465

FEBRUARY 20, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS ADDRESS.

A. My name is John A. Ruscilli. I am employed by BellSouth as Senior Director for State Regulatory for the nine-state BellSouth region. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. ARE YOU THE SAME JOHN RUSCILLI THAT FILED DIRECT TESTIMONY IN THIS PROCEEDING ON DECEMBER 20, 2000?

A. Yes. I filed direct testimony, including two exhibits.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to the policy aspects of numerous unresolved issues addressed in the testimony of Mr. Gregory Follensbee filed on behalf of AT&T Communications of the South Central States, Inc. and TCG Ohio (collectively "AT&T").

Issue 1: Should calls to Internet service providers be treated as local traffic for the

purposes of reciprocal compensation? (Attachment 3)

Q. PLEASE RESPOND TO MR. FOLLENSBEE'S DISCUSSION OF "CALLER PAYS" AS IT RELATES TO ISP TRAFFIC.

A. First, BellSouth concurs in Mr. Follensbee's discussion of the "caller pays" tradition for local calls. When BellSouth provides local service to an end user in Frankfort, that end user pays BellSouth for local exchange service. When BellSouth's end user in Frankfort calls another BellSouth end user in Frankfort, BellSouth collects no additional compensation for this call because the caller has already paid BellSouth for the privilege of originating and terminating local calls within the local calling area.

Taking this example a step further, when the called party is served by a CLEC such as AT&T, BellSouth owes AT&T compensation for the portions of AT&T's network that are used to complete the local call. In this situation, because AT&T provides part of the network between the two customers, BellSouth has some cost savings. When BellSouth's end user completes a local call to AT&T's end user, BellSouth has already been compensated for the local call by the calling party, and BellSouth shares a portion of that revenue with AT&T via reciprocal compensation.

Now, let's introduce an Internet Service Provider (ISP) into the picture. I'll start with the scenario where BellSouth's end user purchases his Internet service from an ISP served by BellSouth. Again, BellSouth's end user has purchased local exchange service from BellSouth. The ISP also purchases service from BellSouth.[1] When

[1] As I explained in detail in my direct testimony, the ISP purchases access service at local exchange rates, as required by the FCC.

BellSouth's end user accesses the Internet, no additional money changes hands. Next, assume that AT&T wins the ISP from BellSouth, so the ISP now purchases its access service from AT&T. When BellSouth's end user accesses the Internet, AT&T contends that BellSouth owes AT&T reciprocal compensation. There are several reasons why BellSouth does not owe AT&T reciprocal compensation for this traffic.

First, as I explained in my direct testimony, and as Mr. Follensbee admitted in the arbitration proceeding in South Carolina, ISP traffic is jurisdictionally interstate. Reciprocal compensation is only applicable to local traffic. Second, AT&T is already being compensated by the ISP for the portion of AT&T's network that is used in carrying Internet traffic. Whether the ISP traffic is generated by BellSouth's end users or by AT&T's end users is irrelevant. If BellSouth were to compensate AT&T for this traffic, AT&T would be paid twice – once by the ISP and again by BellSouth.

It makes no sense for AT&T to claim that BellSouth should compensate it for ISP traffic that BellSouth's end users originate to ISPs served by AT&T. Again, when BellSouth serves both the end user and the ISP, BellSouth is compensated by the ISP for the traffic that BellSouth delivers to the ISP. It is nonsensical for AT&T to claim that, because it now serves the ISP, BellSouth owes AT&T compensation for ISP traffic over and above what AT&T receives from its ISP customers. AT&T is clearly being compensated by its ISP customers for the use of AT&T's network in delivering ISP traffic.

Q. PLEASE RESPOND TO MR. FOLLENSBEE'S COMMENT AT PAGE 10 THAT THE D.C. CIRCUIT LEFT IT TO THE STATE COMMISSIONS TO

DETERMINE HOW ISP TRAFFIC SHOULD BE CLASSIFIED.

A. I consider Mr. Follensbee's view to be directly contrary to the action the Court actually took. Indeed, the Court pointed out that its having vacated the FCC's Declaratory Ruling leaves the incumbents "free to seek relief from state-authorized compensation that they believe to be wrongfully imposed." (March 24, 2000 D. C. Circuit Court Order at page 9).

Issue 4: What does "currently combines" mean as that phrase is used in 47 C.F.R. § 51.315(b)? (Attachment 2)

Issue 5: Should BellSouth be permited to charge AT&T a "glue charge" when BellSouth combines network elements?

Q. HAS MR. FOLLENSBEE PROVIDED ANY RATIONALE TO THE COMMISSION AS TO WHY BELLSOUTH SHOULD BE REQUIRED TO COMBINE UNEs FOR CLECs AT COST-BASED RATES?

A. No. In a futile attempt to make his point, Mr. Follensbee first cites federal rule 57 C.F.R. §51.315(b) that forbids ILECs such as BellSouth from separating requested network elements that are currently combined. BellSouth does not dispute that it cannot separate elements that are currently combined, unless asked to do so by the CLEC. Next, Mr. Follensbee cites federal rule 57 C.F.R. §51.315(c) that required ILECs to combine elements for CLECs, noting that this particular rule is vacated. Mr. Follensbee claims that these two rules – subparts (b) and (c) – collectively defined the ILECs' complete obligation relating to network combinations. BellSouth agrees with Mr. Follensbee. Again, subpart (b) is in effect, and subpart (c) is

vacated.

Vacated subpart (c) states:

> Upon request, an incumbent LEC shall perform the functions necessary to combine unbundled network elements in any manner, even if those elements are not ordinarily combined in the incumbent LEC's network….

Indeed, the fact that this rule is vacated makes clear that ILECs have no obligation under the Act to perform the functions necessary to combine network elements for CLECs <u>at all</u>, and certainly not at cost-based rates.

Q. WHEN BELLSOUTH PROVIDES A CUSTOMER WITH AN ADDITIONAL LINE, OR SERVES A NEW PREMISES, DOESN'T BELLSOUTH HAVE TO COMBINE NETWORK ELEMENTS?

Generally, yes. Physical work is required to combine the elements required to provide the service, and BellSouth incurs the cost of performing such work. Mr. Follensbee makes the feeble argument that, because BellSouth would have to do this work if it is serving the customer, BellSouth should do the work when a CLEC is going to serve the customer. Indeed, Mr. Follensbee opines at page 16 that "the most efficient solution is for BellSouth to combine these elements … and then provide the entrant with the requested combination." I certainly agree that Mr. Follensbee's proposal would be the most efficient solution for the CLEC, because the CLEC would get the benefit of BellSouth having done the CLEC's work, and BellSouth would have incurred all the cost with no compensation from the CLEC.

Q. IN BELLSOUTH'S NETWORK, COULD THERE EXIST A SCENARIO WHEREIN THE LOOP AND THE PORT ARE COMBINED, AND THERE IS DIAL TONE ON THE LINE, BUT THERE IS NO SERVICE BEING PROVIDED TO A PARTICULAR CUSTOMER AT THAT PARTICULAR LOCATION?

A. Yes. This arrangement is typically referred to as "QuickService." Consider a customer that has been receiving local exchange service from BellSouth, and the customer sells his house and moves. He calls BellSouth to have his service disconnected. Generally, it is BellSouth's policy to leave those facilities connected through from the customer's network interface device ("NID") to the main distributing frame ("MDF") in the central office. The connection on the MDF between the loop and the switch port is also left in place.[2] Thus, there will be dial tone on the line, but there is no service being provided for which a customer is paying BellSouth. If one were to plug a phone into a jack in that house, one would be able to call 911 or to call BellSouth's business office, but calls could not be placed to any other number, and calls could not be received over the line. Where such facilities are combined in BellSouth's network (that is, where QuickService has been applied to a disconnected line), BellSouth will provide the combination to a requesting CLEC at cost-based rates.

[2] The assumption is that the existing facilities will be re-used to provide service to a new customer at that same location. However, in the event that the port or a portion of the loop is needed to fill a service order at another location where no other facilities are available, the QuickService facility will be taken apart so that service can be provided at the alternate location. In that case, the loop and the port will no longer be combined to the original location.

Q. PLEASE RESPOND TO MR. FOLLENSBEE'S CONTENTION THAT ACCESS TO UNE COMBINATIONS IS NECESSARY FOR WIDESPREAD COMPETITION.

A. Actually, the evidence would suggest exactly the contrary. Indeed, AT&T's position with regard to this issue is quite curious. As I stated in my direct testimony, there are over 1.2 million lines in service in Kentucky today. AT&T can request that <u>any</u> of those lines be provided to AT&T on a "switch-as-is" basis, which means that AT&T can have the existing combination of elements at cost-based rates. By simply requesting that these already combined elements be provided to AT&T as UNE combinations, which BellSouth is obligated to do, AT&T could take every single customer BellSouth has in Kentucky.

However, instead of doing that, AT&T apparently prefers to spend its time and this Commission's time arguing that competition is hampered in Kentucky as a result of BellSouth's refusal to combine elements at cost-based rates for AT&T when the elements are not already combined in BellSouth's network. Stated another way, if AT&T wins the customer, BellSouth agrees that it will transfer that customer's service to AT&T using a "combination" of loops and ports at cost-based rates. However, AT&T still argues that BellSouth is stifling competition in Kentucky because BellSouth refuses to do AT&T's work for it for "new" customers, or for customers who want to add another line. Quite frankly, I think that a reasonable person would have to look at this issue and wonder what AT&T was really up to.

At any rate, the accuracy of Mr. Follensbee's contention that access to UNE combinations is necessary for widespread competition depends on which segments of

the market are examined. Obviously, facilities-based CLECs have focused their efforts on the more lucrative business markets and all but ignored the residential market. The hallmark reform of the Act was to remove the statutory barriers and create a three-pronged means for competition to develop – build facilities, resale, and UNEs. CLECs have varied in their desire to use each of these means, so measuring competition based solely on UNEs (including UNE combinations) is misguided.

Q. PLEASE RESPOND TO MR. FOLLENSBEE'S CITE AT PAGE 17 TO THE GEORGIA COMMISSION'S RULING ON THIS ISSUE IN ITS GENERIC COMBINATION DOCKET.

A. While Mr. Follensbee quotes accurately from the Georgia Commission's Order, he fails to note that the Commission further stated that "if the Eighth Circuit Court of Appeals determines that ILECs have no legal obligation to combine UNEs under the Federal Act, the Commission will reevaluate its decision with regard to the requirement that BellSouth provide combinations of typically combined elements where the particular elements being ordered are not actually physically connected at the time the order is placed." (February 1, 2000 Order in Docket No. 10692-U at page 22).

Issue 6: Under what rates, terms, and conditions may AT&T purchase network elements or combinations to replace services currently purchased from BellSouth's tariffs? (Attachment 2)

Q. PLEASE RESPOND TO MR. FOLLENSBEE'S CONTENTION AT PAGE 22

THAT BELLSOUTH MAY NOT APPLY TERMINATION LIABILITY CHARGES WHEN TARIFFED SERVICES ARE CONVERTED TO UNBUNDLED NETWORK ELEMENT ("UNE") COMBINATIONS.

A. Mr. Follensbee has chosen in his direct testimony to refer to termination liabilities as "cancellation charges." He alleges that BellSouth plans to charge AT&T "cancellation charges" when tariffed services AT&T is purchasing from BellSouth are, at AT&T's request, converted to unbundled network elements. Mr. Follensbee claims that "cancellation charges" are applicable only when a service is completely terminated and is not replaced with another service. He contends that, since AT&T is converting tariffed services to UNE combinations, and is not "canceling" the service, no "cancellation charges" are applicable.

He is incorrect. When BellSouth has a relationship with a user of its services, and that relationship has certain conditions that have to be met if the relationship changes, then those conditions - in this case, termination liabilities - must be met. A customer who is under contract generally pays lower rates than he would pay if he were not under contract. Termination liabilities ensure that the service provider receives a fair price for the service in the event the customer terminates the contract early or does not live up to the volume commitment. Therefore, if a contract is terminated early, and the terms of the volume and term agreement are not met, it is appropriate for BellSouth to receive payment of the early termination charges.

As Mr. Follensbee explains at page 21 of his testimony, AT&T is looking to convert special access services to UNEs. Indeed, the FCC recognized that termination liabilities could apply in this situation, stating in its UNE Remand Order that "any

substitution of unbundled network elements for special access would require the requesting carrier to pay any appropriate termination penalties required under volume or term contracts." (CC Docket No. 96-98, FCC 99-238 (Rel. Nov. 5, 1999), page 221, footnote 985).

Q. PLEASE EXPLAIN WHAT YOU MEAN BY "VOLUME AND TERM" AGREEMENT.

A. Certain of BellSouth's tariffed offerings include rate schedules that vary dependant upon the length of the contract or the quantity of lines the customer agrees to order and maintain. Such pricing structures are common in the industry. For example, a particular service might have a recurring monthly rate of $20.00. If the end user agrees to sign a 24-48 month contract, meaning that the end user agrees to keep the service for a minimum of 24 months, the monthly recurring rate might be $18.00. Likewise, the tariff might include a 49-72 month recurring rate of $16.00. Typically, such tariffed services also include a termination liability that applies if the end user terminates the contract early or does not meet the volume commitment.

The contract that AT&T seeks to abrogate began in June, 1999 and continues until April, 2004 (58 months). In exchange for the lower contract rates, AT&T made a specific monthly revenue commitment to BellSouth. Now, less than two years into the contract, because AT&T now has the opportunity to convert certain of these tariffed services to UNE combinations at even cheaper rates, AT&T wishes to be "let out" of its contract with no application of termination liabilities.

Q. PLEASE ADDRESS MR. FOLLENSBEE'S CONTENTION AT PAGE 23

THAT THE SERVICE IS NOT BEING TERMINATED.

A. BellSouth agrees that the service is not being terminated. However, the commitment AT&T made was not simply to continue the service. The commitment was for a predetermined billing level, and that is what is at issue here, rather than a question of whether AT&T does or does not continue to use the facilities.

If AT&T were currently purchasing tariffed services from BellSouth at month-to-month rates, then BellSouth would simply effect the conversion to UNE rates. However, because AT&T is currently purchasing tariffed services under contract at lower rates based on a volume and term commitment, BellSouth will apply any applicable termination liabilities when services are converted to UNEs.

A customer who purchases service on a month-to-month basis in lieu of purchasing the same service on a contract basis presumably does so because that customer does not want to make a volume and term commitment or be exposed to a termination liability. AT&T's position on this issue, if adopted, would mean that even though AT&T agreed to a volume and term contract and obtained a lower rate than a customer purchasing on a month-to-month basis would receive, AT&T could avoid the termination liability simply by converting the service to UNEs prior to the expiration of the contract. Obviously, the consequence of such action would be that AT&T would receive more favorable treatment than the customer who chose to purchase the service on a month-to-month basis.

Q. PLEASE RESPOND TO MR. FOLLENSBEE'S ALLEGATION AT PAGE 22 THAT TERMINATION LIABILITIES DISCRIMINATE AGAINST CLECs

WHEN A CUSTOMER WANTS TO CHANGE SERVICE.

A. Mr. Follensbee's argument makes no sense when considered in the context of AT&T using wholesale tariffed services as opposed to UNE combinations. In recent arbitration proceedings in other BellSouth states, AT&T has been very clear that this issue is not meant to address retail end users, but is only meant to address AT&T as the wholesale purchaser.

AT&T is serving the customer with tariffed special access, and now AT&T wants BellSouth to make a records change and begin billing AT&T a lower rate (the UNE combination rate). Again, BellSouth does not dispute AT&T's right to convert qualifying special access circuits to UNE combinations. However, Mr. Follensbee's claim that application of termination liabilities results in discrimination against CLECs when a customer wants to change service is nonsensical. AT&T is already serving the customer. It is not the customer who is changing service. Indeed, as AT&T would no doubt insist, changing the billing from a tariffed service to a UNE combination would have no effect whatsoever on the customer. In fact, Mr. Follensbee points out at page 23 of his testimony that after the special access circuits are converted to UNEs, "the customer will still receive the same service from AT&T and the service provided by BellSouth to AT&T will remain the same."

Q. HOW DO YOU RESPOND TO MR. FOLLENSBEE'S ALLEGATION AT PAGE 22 THAT AT&T HAD NO CHOICE BUT TO PURCHASE THESE TARIFFED SERVICES FROM BELLSOUTH?

A. I disagree completely with Mr. Follensbee's portrayal of BellSouth as "unwilling to

provide combinations of network elements in lieu of special access." AT&T, had it chosen to do so, could have combined the UNEs necessary to provide the service that it wanted. However, in keeping with its position on several of the issues presented in this case, AT&T did not want to incur the expense of doing so. AT&T wanted, and this was the real issue, for BellSouth to combine the UNEs for AT&T, but BellSouth is not required to do this for AT&T at UNE rates. Because AT&T chose not to do the combining itself, and because BellSouth is not required to do the combining, AT&T chose to purchase the tariffed services from BellSouth, hoping to be able to convert those to UNEs at a later date. AT&T has done what it has done based on its own economic self-interest. Again, BellSouth is under no obligation to combine elements for CLECs at UNE rates.

AT&T could have purchased these services on a month-to-month basis. Of course, doing so would have cost more, so AT&T chose instead to enter into a contract to receive lower rates based on a volume and term commitment and an agreement to pay termination liabilities if that commitment was not honored. Now, AT&T wants to keep the benefit of the lower rates and break the commitment without bearing the consequences it agreed to bear.

Issue 7: How should AT&T and BellSouth interconnect their networks in order to originate and complete calls to end-users? (Attachment 3)

Q. HAS MR. FOLLENSBEE ACCURATELY PORTRAYED THE DISAGREEMENT BETWEEN THE PARTIES ON THIS ISSUE?

A. No, he has not. First, let me be clear that BellSouth does not dispute that, for AT&T's originating traffic, AT&T may choose to establish only one IP per LATA. Based on Mr. Follensbee's testimony, AT&T agrees that it has the responsibility to pay BellSouth reciprocal compensation for the portions of BellSouth's network that are used to terminate AT&T's traffic when AT&T hands off traffic to BellSouth at that single point. Mr. Follensbee is, however, completely incorrect when he alleges that BellSouth's proposal requires AT&T to transport AT&T's originating traffic all the way to each BellSouth end office in each BellSouth local calling area. As I explained in my direct testimony, BellSouth's proposal does <u>not</u> require that AT&T bring its originating traffic to <u>each</u> BellSouth end office. AT&T can hand off its traffic at a single point in the local calling area and BellSouth will transport and terminate that traffic to any other point in the local calling area.

The disagreement, however, involves originating traffic, not terminating traffic. Regarding BellSouth's originating traffic, Mr. Follensbee is correct that BellSouth's proposal is for AT&T to be responsible for transporting BellSouth's originating traffic from some point in the BellSouth local calling area to AT&T's switch. As I explained in my direct testimony, if a BellSouth end user in the Shelbyville local calling area originates a call to an AT&T end user in the Shelbyville local calling area, AT&T contends that BellSouth should bear the cost of transporting the call from the BellSouth end user in Shelbyville to AT&T's point of interconnection in Louisville. BellSouth's position is that the call is being transported out of the Shelbyville local calling area solely as a
result of AT&T's network architecture. Again, this is where the parties disagree.

Q. WHAT ARE THE CONSEQUENCES OF AT&T'S POSITION ON THIS

ISSUE, AS REPRESENTED BY MR. FOLLENSBEE?

A. First, AT&T's position means that it gets to designate where it will deliver calls originated by AT&T's end users to BellSouth for BellSouth to then deliver to the BellSouth end user being called. BellSouth agrees with AT&T that it can do this. However, AT&T's position also means that it gets to designate how many places on BellSouth's network AT&T will accept BellSouth-originated traffic destined for AT&T's end users. That is, there is absolutely no symmetry in terms of each party deciding where it is willing to hand off its originating traffic to the other party. AT&T, under its approach, may decide to have only one or two interconnection points in a LATA where it will hand its originating traffic off to BellSouth.

If AT&T prevails, then BellSouth will be limited to no more than one or two interconnection points as well, even if BellSouth has fifteen or twenty local calling areas in the LATA. This means that, in a LATA with numerous local calling areas, BellSouth would be required to incur the cost of hauling local calls from one local calling area to a distant interconnection point, where the call would then be handed off to AT&T to be switched and brought back by AT&T to the same BellSouth local calling area in which the call originated. Adopting AT&T's position means that even though AT&T itself has created the situation where a call has to be hauled fifty or a hundred miles to be switched, it will have managed to require BellSouth to pay for a portion of these costs. Simply put, AT&T wants BellSouth to subsidize AT&T's selected network design.

As I explained in my direct testimony, BellSouth's position on this issue does not mean that AT&T has to actually build a network to each of BellSouth's local calling

areas. AT&T can build out its network that way if it chooses, but it is not required to do so. AT&T can lease facilities from BellSouth or from any other provider to bridge the gap between its network (that is, where it designates its Point of Interconnection) and each BellSouth local calling area. Again, BellSouth's position is that BellSouth will be financially responsible for transporting its originating traffic to a single point in each local calling area. However, BellSouth is not obligated to be financially responsible for hauling AT&T's local traffic to a distant point dictated by AT&T.

Q. DOES MR. FOLLENSBEE'S OFFER THAT AT&T MIGHT ESTABLISH TWO INTERCONNECTION POINTS ("IPs") IN EACH LATA RESOLVE THIS ISSUE?

A. Regrettably, it does not. First, Mr. Follensbee qualifies AT&T's offer when he says that if traffic volumes are insufficient, then AT&T will only establish one IP in each LATA. Second, let's assume that AT&T establishes two IPs in each LATA (say, in Louisville and in Shelbyville in the Louisville LATA), but AT&T also has end users in Frankfort. BellSouth's position remains that, under AT&T's proposal, BellSouth would incur additional costs to transport calls from BellSouth's end users in Frankfort to AT&T's end users in Frankfort solely due to AT&T's choice of network architecture which requires that the call be transported out of the Frankfort local calling area to AT&T's IP either in Louisville or Shelbyville.

Q. MR. FOLLENSBEE SUGGESTS, AT PAGES 26-27 OF HIS TESTIMONY, AND WHILE DISCUSSING HIS EXHIBITS GRF-3 THROUGH GRF-5, THAT BELLSOUTH IS ATTEMPTING TO IMPOSE ADDITIONAL COSTS ON AT&T, RATHER THAN THE OTHER WAY AROUND AS YOU MAINTAIN.

SINCE YOU BOTH CANNOT BE RIGHT, CAN YOU EXPLAIN WHY MR. FOLLENSBEE IS WRONG?

A. Mr. Follensbee has created an illusion that is worthy of David Copperfield. First, let me say that I agree with what he has portrayed in his Exhibit GRF-3. Historically, when a BellSouth local subscriber in a BellSouth local calling area places a call to another BellSouth local subscriber in that same local calling area, BellSouth incurs the cost of switching at the originating caller's office, transport to the called party's end office and switching at the called party's end office. We do not have a dispute about that.

Similarly, I agree with Mr. Follensbee's Exhibit GRF-4, provided that the call originates and terminates in the same BellSouth local calling area. A BellSouth customer originates a call, and BellSouth switches the call and delivers it to AT&T's Point of Interconnection located in that same local calling area. BellSouth will pay the expenses of getting the call to that Point of Interconnection in the BellSouth local calling area, because that is what BellSouth's local subscribers are paying BellSouth to do. When the call reaches the Point of Interconnection, and AT&T switches the call to its end user, BellSouth will pay reciprocal compensation in the form of end office switching to AT&T. BellSouth has absolutely no problem with that scenario. But remember, because it is critically important, that all of this is taking place in the same BellSouth local calling area.

Turning to Mr. Follensbee's Exhibit GRF-5, I must say that AT&T has the story wrong. Or, more precisely, Mr. Follensbee has obfuscated the story. If everything that was pictured on Exhibit GRF-5 all took place within the BellSouth Louisville local

calling area, Mr. Follensbee would be absolutely wrong. The BellSouth customer would originate a call, and BellSouth, once again, would deliver it to the designated Point of Interconnection. AT&T would pick up the call at the Point of Interconnection and carry it back to its switch. AT&T would then switch the call, and terminate it to its local customer. If all this happened in the Louisville local calling area, BellSouth would owe AT&T for call transport from the Point of Interconnection to AT&T's switch, and then would owe AT&T for local switching for terminating the call. On Exhibit GRF-5, the facility between the BellSouth switch and the AT&T switch appears to be a dedicated facility, so the transport paid in this situation by BellSouth would be some proportional share of the cost of the dedicated facility. The switching rate would be the normal end office rate established for reciprocal compensation.

If the call were flowing the other way (i.e., from AT&T's end user to BellSouth's end user), AT&T would incur the cost of switching its customer's call as well as transporting the call to the Point of Interconnection, an amount that would be exactly equal to what BellSouth pays AT&T when BellSouth's customer originates a call to one of AT&T's customers.

Q. SO WHY IS THIS EVEN AN ISSUE?

A. It is an issue because Mr. Follensbee failed to include something on his exhibit that is critical to this issue. If AT&T's and BellSouth's networks were set up as pictured in Mr. Follensbee's exhibit, everything would be fine. What he has forgotten to point out is that even if AT&T has placed a local switch in a LATA, that switch may be located fifty or a hundred miles from the BellSouth local calling area that AT&T

purports to serve. That is, in his Exhibit GRF-5, the BellSouth customer and the BellSouth switch may be located in Shelbyville, and the AT&T customer may be located in Shelbyville, but AT&T's switch might be located in Louisville. In such a case, AT&T has made the decision to locate the switch in a distant location because that was what was economical for AT&T. That is fine. BellSouth does not care that AT&T has located its switch that far away from the local calling area it is serving.

However, it is absurd for AT&T to cry foul, as Mr. Follensbee does in his discussion of his Exhibit GRF-5, because BellSouth objects to incurring the cost of hauling a call that originates and terminates in Shelbyville, out of the Shelbyville local calling area and over to Louisville. BellSouth will haul the call to a point in the Shelbyville local calling area, and BellSouth will pay for that. It is not equitable, however, to require BellSouth to incur the cost of hauling the call to Louisville because AT&T has chosen not to put a switch in Shelbyville, and that is the situation that is not accurately portrayed by Mr. Follensbee's Exhibit GRF-5.

As I discussed in my direct testimony, the local exchange rates that BellSouth's local subscribers pay are not intended to cover the cost of hauling local calls beyond BellSouth's local calling area. Nevertheless, that is exactly what AT&T wants to force BellSouth (and other local service providers) to do. Evidently, AT&T refuses to pick up the traffic at the Point of Interconnection in each of BellSouth's local calling areas in, for example, the Louisville LATA. At the same time, AT&T has refused to compensate BellSouth for the additional cost of transporting these calls from the various BellSouth local calling areas to a distant location selected by AT&T solely for AT&T's own convenience. It is the additional cost of transporting local traffic from BellSouth's designated Point of Interconnection to a distant location as desired by

AT&T about which the parties disagree.

Q. HOW IS THIS ISSUE IMPACTED BY THE FACT THAT A SMALL PERCENTAGE OF BELLSOUTH'S CUSTOMERS SUBSCRIBE TO EXTENDED CALLING SERVICE ("ECS") OR LATA-WIDE CALLING PLANS?

A. The fact that some of BellSouth's customers subscribe to ECS or LATA-wide calling plans has no impact on this issue. Customers who subscribe to ECS or LATA-wide calling plans pay an additional fee for the ability to call a larger area without incurring toll charges. For example, consider a BellSouth customer in Shelbyville who subscribes to a LATA-wide calling plan. The customer pays a basic local exchange rate that covers calls within the basic local calling area. Either an additional flat fee or a per call or per minute fee is charged for calls this customer originates to locations outside the customer's basic local calling area.

Again, BellSouth's position is that, regardless of the type of calling plan to which the end user subscribes, BellSouth should not have to bear the cost of hauling a local call that originates and terminates in Shelbyville to AT&T's distant point of interconnection. However, when BellSouth's end user in Shelbyville originates a call to AT&T's end user in Louisville, BellSouth agrees that it should haul the call to AT&T's point of interconnection in Louisville at no charge to AT&T because BellSouth's end user compensates BellSouth for carrying that call. If BellSouth's end user has basic local exchange service, BellSouth will receive intraLATA toll from its end user for hauling the call since Louisville is not in the Shelbyville local calling area. If Bellsouth's end user has LATA-wide calling, the end user pays BellSouth an

additional fee (either flat rate, per call or per minute) to haul the call from Shelbyville to Louisville.

Q. HAVEN'T THE PARTIES AGREED THAT CALLS WITHIN THE LATA WILL BE CONSIDERED LOCAL FOR PURPOSES OF RECIPROCAL COMPENSATION?

A. Yes. This means that the parties have agreed to pay reciprocal compensation, rather than access charges, on calls that originate and terminate within the LATA. However, this agreement has no impact on the issue being discussed here. Reciprocal compensation and interconnection are two very different things. For a call that originates with a BellSouth customer, interconnection occurs between BellSouth's local switch and the CLEC's point of interconnection. Reciprocal compensation begins when the call is handed off to the CLEC's network.

Q. PLEASE COMMENT ON AT&T'S PROPOSED "NETWORK INTERCONNECTION SOLUTION" AS PRESENTED BY MR. FOLLENSBEE.

A. Mr. Follensbee's proposed "solution" is simply an elaborate ruse that AT&T attempts to use to impose the additional costs of its network design onto BellSouth. Adopting Mr. Follensbee's solution would create the inequities that I discussed at length in my direct testimony. There is nothing equivalent, equitable, fair or reasonable about AT&T's solution, and it should be rejected.

Q. CAN YOU ILLUSTRATE YOUR POINT BY ADDRESSING EACH OF THE INDIVIDUAL COMPONENTS OF AT&T'S "SOLUTION"?

A. Yes. AT&T proposes that each parties' interconnection points (i.e., where it receives traffic for termination) should be situated at the "top" of its network. Apparently, in Mr. Follensbee's view, when AT&T interconnects with BellSouth's local network in Louisville, AT&T is interconnected to <u>every</u> BellSouth local network in the Louisville LATA. That is not true because BellSouth has numerous local networks within the Louisville LATA. For example, when a BellSouth end user in Shelbyville calls another BellSouth end user in Shelbyville, the call traverses BellSouth's local network in Shelbyville and does not extend beyond the physical boundaries of the Shelbyville local calling area.

In other words, the call path would start at the first end user's house and continue to the serving central office. Next, a couple of things could occur. If that central office has direct trunking to the second end user's serving central office, then the call would travel over those direct trunks to the second central office and then travel to the second end user's house. Conversely, if traffic levels have not justified direct trunking between these two central offices, the call would travel from the first central office to BellSouth's local tandem and would then be transported to the second central office for completion to the second end user's house. Again, my point is that this local call did not travel outside of the Shelbyville local calling areas. However, under AT&T's proposal, if the second end user is an AT&T customer, this same call would have to be transported to AT&T's point of interconnection in Louisville, and AT&T avows that BellSouth should incur the cost of transporting the call outside the Shelbyville

local calling area to AT&T's point of interconnection in Louisville. BellSouth disagrees.

AT&T proposes, in essence, that it will decide how many Points of Interconnection are convenient and appropriate for AT&T, and then BellSouth would be stuck with that same number. In effect, AT&T proposes that the party with the fewest number of interconnection points, which would usually, or at least for the foreseeable future, be AT&T, would require the other party to aggregate all of its traffic to that same number of points. Further, AT&T proposes that each party be responsible for delivering its interconnection traffic (i.e., traffic originating on or transiting through its network) to the other party's interconnection points. In other words, each party has to bear the cost of delivering traffic to the location or locations specified by the other party. Simply put, these parts of AT&T's solution operate together to force BellSouth to provide free facilities to AT&T.

To illustrate the effect of each party having an equal number of interconnection points, let's look at the Louisville LATA. AT&T may only want to interconnect with BellSouth at one point in the LATA. Therefore, under AT&T's proposed solution, BellSouth would be required to aggregate all of the local traffic from every one of its local networks in the Louisville LATA at a single location for delivery to AT&T. Because BellSouth's existing local networks are not aggregated at a single point in the LATA, BellSouth would have to create this new network configuration just to accommodate AT&T.

AT&T's proposal that each party has to bear the cost of delivering its originating traffic to the location or locations specified by the other party would require BellSouth

to incur the cost of all of the new facilities needed to implement the portion of AT&T's solution that requires each party to have the same number of interconnection points. AT&T completely ignores the fact that it must connect to BellSouth's existing local networks. Instead, AT&T is attempting to force BellSouth to extend its existing local networks to accommodate AT&T, at no charge to AT&T.

Indeed, once BellSouth is granted interLATA relief, AT&T could elect to provide local service to customers in Kentucky from AT&T's switch in California, and AT&T would expect BellSouth to pay for part of the facility necessary to get from Kentucky to California. Now, I am sure that AT&T would protest that I am overstating the matter; however, that is the ultimate result of AT&T's proposed solution to this issue.

Q. IS AT&T'S PROPOSED SOLUTION CONSISTENT WITH THE FCC'S LOCAL COMPETITION ORDER?

A. No. Under AT&T's proposed solution, where the Point of Interconnection and the interconnection point are at the same place, the terminating party establishes the Point of Interconnection. Of course, the FCC's Order established that the originating party is permitted to establish the Point of Interconnection. In Section IV of its Order, the FCC established the concept that, due to reciprocal compensation being paid by the originating company, the originating company may seek to determine its Point of Interconnection in order to minimize its reciprocal compensation obligation to the terminating company. At ¶ 209 of its Local Competition Order, the FCC states:

> We conclude that we should identify a minimum list of technically feasible points of interconnection that are critical to facilitating entry by competing carriers. Section 251(c) gives competing carriers the right to deliver traffic

> terminating on an incumbent LEC's network at any technically feasible point on that network rather than obligating such carriers to transport traffic to less convenient or efficient interconnection points. Section 251(c)(2) lowers barriers to competitive entry for carriers that have not deployed ubiquitous networks by permitting them to select the points in an incumbent LEC's network at which they wish to deliver traffic. Moreover, because competing carriers must usually compensate incumbent LECs for the additional costs incurred by providing interconnection, competitors have an incentive to make economically efficient decisions about where to interconnect.

AT&T is requesting this Commission to adopt a plan which conflicts with this ruling by the FCC. As I explained in my direct testimony, BellSouth simply requests that AT&T be required to bear the cost of facilities that BellSouth may be required to install, on AT&T's behalf, in order to connect from a BellSouth local calling area to AT&T's Point of Interconnection located outside that local calling area.

Q. THROUGHOUT HIS TESTIMONY, MR. FOLLENSBEE REFERS TO NUMEROUS COURT CASES THAT HE CONTENDS SUPPORT AT&T'S POSITION. CAN YOU COMMENT?

A. Since neither Mr. Follensbee nor myself are attorneys, it is probably inappropriate for us to do much more than comment as laypersons on these decisions. Indeed, any extensive discussion of legal cases is best left to the briefs. I understand, however, that there are cases that are contrary to AT&T's position such as *US West v. AT&T Communications*, 31 F. Supp.2d 839, 852 (D. Or. 1998), *reversed in part, vacated in part sub nom. US West v. AT&T*, 224 F.3d 1049 (9th Cir. 2000) and

US West v. Jennings, 46 F. Supp. 2d 1004 (D. Az. 1999). I would note that the Oregon case was the one in which the FCC submitted an *amicus curiae* brief that AT&T holds out as supporting its position from time to time. Obviously the Oregon court must not agree with AT&T's interpretation, as it evidently did not adopt AT&T's position.

Mr. Follensbee cited the TSR Wireless case (*In re TSR Wireless, LLC, et. al., v. U.S. West*, FCC 00-194) as supporting his position. However, in that decision, the FCC said that local exchange companies were only required to deliver calls to wireless carriers without charge when the call was delivered to the wireless carrier within the Major Trading Area ("MTA"), which is the wireless carrier's equivalent of a local service area. Again, I am not an attorney, but simple logic tells me that if a local exchange carrier does not have to deliver a call to a wireless carrier free of charge outside the MTA (the wireless carrier's local service area), then it follows that BellSouth would not be required to deliver its local wireline traffic free of charge outside the local service area in which the call originates.

Q. PLEASE ADDRESS MR. FOLLENSBEE'S RELIANCE ON THE FCC'S RECENT OKLAHOMA 271 ORDER IN REGARD TO THIS ISSUE.

A. Mr. Follensbee is simply wrong. As much as he might wish that the FCC had adopted AT&T's position in the SBC Oklahoma/Kansas 271 decision, the FCC did not. Importantly, as Mr. Follensbee will agree, the issue was presented to the FCC by AT&T and SBC. Indeed, in the Florida arbitration between BellSouth and AT&T that was recently completed, AT&T actually produced a brief that laid out the issue just as it is presented here by AT&T.

Obviously, the FCC could have chosen to reach a conclusion that would have put this matter to rest. Indeed, all the FCC had to say was that "AT&T is entitled to have one point of interconnection in each LATA and SBC is obligated to deliver all local calls, where ever they originate in that LATA, to AT&T's single point of interconnection at no additional cost to AT&T." However, that is not what the FCC did. Instead, the FCC skirted the issue one more time, inviting AT&T to file a complaint with the FCC if it didn't like what SBC was doing. Then, in a rather amazing change of direction, the FCC cautioned SBC about taking too liberal a view of the FCC's earlier decision, citing to its reciprocal compensation rules and its decision in TSR, which I addressed earlier. The problem with all of this is that the TSR decision only dealt with the issue of calls that originated and terminated in the same local service area, and addressed the incumbent carrier's obligation to deliver traffic to the competing carrier within that local service area. That is, all TSR stands for is that ILECs have an obligation to deliver, at no charge, calls that the ILEC's subscribers originate to a competing local carrier within the local service area where the call originates. That is simply not the issue here between BellSouth and AT&T. BellSouth is willing to deliver all local calls that originate and terminate in the same local service area to AT&T at a point in that local service area at no charge to AT&T. However, AT&T is not satisfied with that. Instead, AT&T wants BellSouth to commit to haul "local" calls halfway across Kentucky at no cost to AT&T. If that is what the FCC intended, it should say so plainly before this Commission, or any other state commission, orders such a patently unfair result.

Q. HOW DOES BELLSOUTH PROPOSE TO RESOLVE THIS ISSUE?

A. For purposes of determining financial responsibility, BellSouth should be allowed to designate one Point of Interconnection in each of its local calling areas where AT&T must become financially responsible for picking up BellSouth's originated local traffic destined for AT&T's local customers. BellSouth, not AT&T, is entitled to designate the pickup point for such traffic, and that point can be on BellSouth's network. BellSouth is willing to accommodate AT&T's proposed network design that does not have a Point of Interconnection in each BellSouth local calling area. However, AT&T would have to compensate BellSouth for transporting BellSouth's originating traffic to an AT&T designated Point of Interconnection outside the basic local calling area (but inside the LATA) in which the local call originates and terminates. I believe this to be an equitable arrangement for both parties. This solution would also alleviate AT&T's concern that its collocation space is being used for both interconnection as well as accessing unbundled loops (Follensbee, pages 50-51). BellSouth's proposal would alleviate this concern because BellSouth would deliver its originated local traffic to a point in the LATA as designated by AT&T which is outside the BellSouth local calling area and thus not utilize additional collocation space.

Issue 9: Should AT&T be permitted to charge tandem rate elements when its switch serves a geographic area comparable to that served by BellSouth's tandem switch? (Attachment 3)

Q. PLEASE ADDRESS MR. FOLLENSBEE'S CONTENTION THAT THE ONLY RELEVANT CRITERIA FOR DETERMINING ELIGIBILITY FOR TANDEM SWITCHING CHARGES IS THE GEOGRAPHIC AREA SERVED.

A. Mr. Follensbee is incorrect. As I explained in my direct testimony, the FCC has a

two-part test to determine if a carrier is eligible for tandem switching: 1) a CLEC's switch must serve a geographic area comparable to the geographic area served by the ILEC's tandem switch, and 2) a CLEC's switch must perform tandem switching functions for local traffic. Indeed, various court decisions support BellSouth's contention that the FCC has established a two-part test. In a case involving MCI (MCI Telecommunication Corp. v. Illinois Bell Telephone, 1999 U.S. Dist. LEXIS 11418 (N.D. Ill. June 22, 1999)), the U.S. District Court specifically determined that the test required by the FCC's rule is a functionality/geography test. In its Order, the Court stated:

> In deciding whether MCI was entitled to the tandem interconnection rate, the ICC applied a test promulgated by the FCC to determine whether MCI's single switch in Bensonville, Illinois, performed functions similar to, and served a geographical area comparable with, an Ameritech tandem switch.[9] (emphasis added).

> [9]MCI contends the Supreme Court's decision in IUB affects resolution of the tandem interconnection rate dispute. It does not. IUB upheld the FCC's pricing regulations, including the 'functionality/geography' test. 119 S. Ct. at 733. MCI admits that the ICC used this test. (Pl. Br. At 24.) Nevertheless, in its supplemental brief, MCI recharacterizes its attack on the ICC decision, contending the ICC applied the wrong test. (Pl. Supp. Br. At 7-8.) But there is no real dispute that the ICC applied the functionality/geography test; the dispute centers around whether the ICC reached the proper conclusion under that test. (emphasis added).

The Ninth Circuit Court of Appeals viewed the rule in the same way, finding that:

> [t]he Commission properly considered whether MFS's switch performs similar functions and serves a geographic area comparable to US West's tandem switch." (U.S. West Communications v. MFS Intelenet, Inc, et. al, 193 F. 3d 1112, 1124).

Furthermore, in evaluating whether a CLEC should receive the same reciprocal compensation rate as would be the case if traffic were transported and terminated via the incumbent's tandem switch, the United States District Court in Minnesota ruled that, "it is appropriate to look at both the function and geographic scope of the switch at issue" *(U.S. West Communications, Inc. v. Minnesota Public Utilities Commission*, 55 F. Supp. 2d 968, 977 (D. Minn. 1999), emphasis added).

Q. PLEASE ADDRESS MR. FOLLENSBEE'S CONTENTION THAT AT&T'S SWITCHES PERFORM TANDEM FUNCTIONS.

A. While contending that FCC rules ignore tandem functionality as it relates to this issue, Mr. Follensbee claims that AT&T's (including TCG's) switches, do, in fact, perform "certain tandem functions." On page 54 of his testimony, Mr. Follensbee states that each of AT&T's switches "acts as an access tandem routing the preponderance of interLATA traffic directly to the applicable interexchange carrier." BellSouth does not take issue with that statement. However, it is wholly irrelevant to the issue at hand. The fact that AT&T's switches perform as tandems for interLATA service is simply not relevant to this issue – reciprocal compensation at the tandem switching rate is due only when tandem switching functions are performed for local

traffic. Therefore, to qualify for reciprocal compensation at the tandem rate, the switch must be performing the tandem switching functions to transport local calls.

Continuing on page 54, Mr. Follensbee addresses the traffic at issue when he explains that "with respect to traffic between any AT&T customer and any BellSouth customer within the same LATA, AT&T has direct trunking to each BellSouth tandem in the LATA so that such traffic may be completed without transiting multiple AT&T switches or multiple BellSouth tandems." (emphasis added). Here, Mr. Follensbee simply demonstrates that BellSouth's tandem switch performs the tandem function for such local traffic – AT&T's switch is functioning only as an end office switch. In fact, this statement further confirms that AT&T is not performing a tandem function. Mr. Follensbee's description indicates that calls from BellSouth local customers to AT&T local customers are delivered directly to the switch serving the AT&T customer. Indeed, as evidenced by Mr. Follensbee's testimony, there is no intermediate switch on AT&T's network for local calls, so AT&T can't be incurring tandem switching costs. In fact, AT&T only has one switch located in Kentucky. Mr. Follensbee's Exhibits GRF-6a and GRF-6b indicate that AT&T is also using switches located in Indiana and Ohio to provide local service to AT&T's end user customers in Kentucky.

Q. DO YOU AGREE WITH MR. FOLLENSBEE'S CONTENTION THAT AT&T'S SWITCHES PERFORM THE "AGGREGATION" FUNCTION TYPICAL OF TANDEM SWITCHES?

A. No. As I explained in my direct testimony, local tandem switches are used to aggregate traffic from numerous end office switches in a local calling area when it is

more economical to route local traffic in that manner than to install direct trunk groups between each and every end office switch. When there are a lot of end office switches in a local calling area, using a local tandem switch to aggregate traffic and to act as a central connection point makes economic sense and avoids a lot of extra trunking that would otherwise be required to ensure that call blockage was limited to acceptable levels. I would note that any one BellSouth local tandem only aggregates local traffic for wire centers in the same local calling area in which the local tandem is physically located. I also must point out that Mr. Follensbee's Exhibit GRF-6c inaccurately states that four of BellSouth's local tandems in Kentucky "serve multiple LATAs." Of course, BellSouth's tandems cannot "serve multiple LATAs" since BellSouth is not authorized to provide interLATA service.

BellSouth's local network generally consists of local tandem switches, end office switches and interoffice transport. However, AT&T's local network generally consists of a single switch and long loops connecting the switch to AT&T's subscribers.

When BellSouth routes a local call from a CLEC such as AT&T through one of BellSouth's tandems, BellSouth completes the call by first switching the call at the tandem, transporting the call to the appropriate local end office and then switching the call to the called party. BellSouth then charges AT&T reciprocal compensation based on the appropriate tandem switching rate, transport rate and local switching rate, since all of these parts of BellSouth's network were used in transporting and terminating the call.

On the other hand, when BellSouth hands off one of its local calls to AT&T, AT&T carries the call back to its end office switch, where the call is switched once and then placed on the appropriate loop to reach the intended recipient of the call. That is, because of AT&T's network design, the call is only switched once, and there are no interoffice transport facilities involved. According to Mr. Follensbee, AT&T has chosen this design because it is cheaper for AT&T to build long loops rather than to build switches.

Nevertheless, and in spite of the fact that only one switch is involved, AT&T wants BellSouth to pay reciprocal compensation to AT&T for calls placed from BellSouth's local subscribers to AT&T's local subscribers at a rate equal to the total of the tandem switching rate and the end office switching rate for every such call AT&T handles. Indeed, AT&T's position that it is entitled to reciprocal compensation from BellSouth at the tandem switching rate for <u>every</u> local call it terminates from BellSouth is simply nonsensical.

For example, consider an AT&T end office switch in Louisville that is connected directly to a BellSouth end office also located in Louisville. When an AT&T end user originates a local call in Louisville that is routed directly to BellSouth's end office switch in Louisville, BellSouth will bill AT&T reciprocal compensation at the end office switching rate because that is the only portion of BellSouth's network that was used to terminate the local call. However, AT&T's position is that, in this example, if the local call originates from the same BellSouth end user and terminates to the same AT&T end user, AT&T is due reciprocal compensation from BellSouth at the tandem switching rate (again, the sum of the end office switching rate and the tandem switching rate). The exact same end users are involved in both calls, the same

switches are used in both calls, yet AT&T's position results in one call generating reciprocal compensation at the end office switching rate, while the other call generates reciprocal compensation at the higher tandem switching rate. A position that leads to such an illogical conclusion simply cannot be right

Q. PLEASE RESPOND TO AT&T's CLAIM AT PAGE 53 THAT ITS SWITCHES COVER A GEOGRAPHIC AREA COMPARABLE TO THE AREA COVERED BY BELLSOUTH'S TANDEMS.

A. Mr. Follensbee has provided maps indicating the geographic area AT&T's switches "cover." Of course, it is a very simple matter to color in areas on a map and to claim that these areas are "covered" by switches. However, in order to establish that AT&T's switches actually serve a geographic area comparable to that served by the incumbent local exchange carrier's tandem switches, AT&T must show the particular geographic area it serves, not the geographic area that its switches can serve. (See 47 C.F.R. § 51.711(a)(3)). In order to make a showing that AT&T's switches serve a geographic area equal to or greater than that served by BellSouth's tandem switches, AT&T must provide information showing the location of its customers and give some indication as to how its customers are actually being served by AT&T's switches. (MCI Telecommunications Corp. v. Illinois Bell Telephone, 1999 U.S. Dist. LEXIS 11418 (N.D. Ill. June 22, 1999)).

To illustrate the importance of this point, assume AT&T has one thousand customers in downtown Louisville, all of which are located in a single office complex next door to AT&T's Louisville switch. Under no set of circumstances could AT&T seriously argue that, in such a case, its switch serves a comparable geographic area to

BellSouth's tandem switch. See Decision 99-09-069, In re: Petition of Pacific Bell for Arbitration of an Interconnection Agreement with MFS/WorldCom, Application 99-03-047, 9/16/99, at 15-16 (finding "unpersuasive" MFS's showing that its switch served a comparable geographic area when many of MFS's ISP customers were actually collocated with MFS's switch).

AT&T has offered no information to the Commission to demonstrate that its switches currently serve areas comparable to BellSouth's tandem. AT&T has not provided the Commission with the location of its customers in Kentucky, information which would be essential for the Commission to determine whether AT&T's switches actually serve areas comparable to BellSouth's tandem switches. Absent such evidence, AT&T has clearly failed to satisfy its burden of proof on this issue.

Issue 13: What is the appropriate treatment of outbound voice calls over internet protocol ("IP") telephony, as it pertains to reciprocal compensation? (Attachment 3)

Q. PLEASE ADDRESS MR. FOLLENSBEE'S VIEW OF HOW THE FCC HAS ADDRESSED THE ISSUE OF REGULATING PHONE-TO-PHONE INTERNET PROTOCOL TELEPHONY.

A. Mr. Follensbee's testimony makes clear that the FCC has danced around the issue of Internet Protocol ("IP") telephony without making any definitive rulings on how traffic routed via such protocol will be treated. As Mr. Follensbee says, the FCC has not ruled that switched access charges are applicable to such calls. Of course, neither has the FCC ruled that switched access charges are not applicable to such calls. Indeed, as I pointed out in my direct testimony, in its April 10, 1998 Report to

Congress the FCC stated that "the record currently before us suggests that this type of IP telephony (i.e., phone-to-phone service) lacks the characteristics that would render them 'information services' within the meaning of the statute, and instead bear the characteristics of 'telecommunication services'." (¶ 89). Because the FCC has not made a determination that voice calls transmitted using IP telephony represent information services, and because only information services are exempted from paying access charges, the FCC has obviously not determined that calls made over IP Telephony are exempt from access charges.

Indeed, a complete reading of the FCC's report makes clear that the FCC recognizes the significant impact that a decision to treat IP telephony as "information services" rather than as "telecommunications services" would have on existing universal service mechanisms. The FCC indicated that upcoming proceedings with more focused records would ensue prior to any final determination. (*Id.*, ¶ 91).

Q. PLEASE ADDRESS MR. FOLLENSBEE'S RELIANCE ON A SPEECH GIVEN BY FCC CHAIRMAN KENNARD ON SEPTEMBER 12, 2000.

A. It is not clear from Chairman Kennard's September 12, 2000, speech that he was actually referring to "voice calls over IP telephony". Indeed, it is likely that he was referring to "voice calls over the Internet" which, as I explained in my direct testimony, is not what BellSouth is addressing in this issue.

Obviously, this terminology is unfamiliar and subject to misuse and misinterpretation. The bare fact is that a long distance voice communication does not become an enhanced service when it is transmitted over a packet switched network rather than

over a circuit switched network. Therefore, BellSouth requests the Commission to determine that access charges, rather than reciprocal compensation, apply to long distance calls, regardless of the technology used to transport the calls.

Issue 21: Should the Commission or a third party commercial arbitrator resolve disputes under the Interconnection Agreement?

Q. WHY IS AT&T'S LATEST PROPOSED LANGUAGE ON THIS ISSUE NOT ACCEPTABLE TO BELLSOUTH?

A. AT&T has offered BellSouth the sleeves out of AT&T's vest. AT&T's latest proposal, if accepted, would typically result in disputes under the Interconnection Agreement being resolved by a commercial arbitrator. I say this because AT&T's proposed language lays out three situations. First, the parties could agree that the dispute would be heard by the Commission. Second, the parties could agree that the dispute would be heard by a commercial arbitrator. Third, if the parties cannot agree, then the aggrieved party will choose the method of resolution.

Based on these three possibilities, it is hard to imagine an example where AT&T is the aggrieved party, and commercial arbitration does not end up being the method of resolution. Mr. Follensbee makes clear in his testimony that AT&T believes disputes can be resolved more quickly through the alternative dispute resolution process than through the Commission. As I explained in my direct testimony, BellSouth disagrees with AT&T that using a commercial arbitrator is a speedy process. Because one party would likely be staked out as wanting disputes to be heard by a commercial arbitrator, and the other party would likely be staked out as wanting disputes to be

heard by the Commission, it is unlikely that the parties would agree on the method of resolution. Therefore, assuming that AT&T is the aggrieved party, AT&T's proposed language would likely result in AT&T's choosing the method.

Q. PLEASE RESPOND TO MR. FOLLENSBEE'S CONCERN AS STATED AT PAGES 63-64 THAT SERVICE AFFECTING DISPUTES THAT REQUIRE IMMEDIATE RESOLUTION MIGHT BE DELAYED FOR NINE TO TWELVE MONTHS DUE TO THE AUTHORITY HAVING A FULL CALENDAR.

A. First, I am certain that the Commission will take whatever steps are necessary to resolve service affecting disputes in as expeditious a manner as possible. Second, BellSouth does not share AT&T's view that commercial arbitration is a speedy process. Further, BellSouth has serious concerns about the ability to secure neutral arbitrators who have a sufficient understanding of the issues. Again, BellSouth believes that this Commission is more capable of handling disputes between telecommunications carriers than are commercial arbitrators. BellSouth should not be obligated to waive its right to have the Commission hear disputes.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

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