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**BEFORE THE COMMONWEALTH OF KENTUCKY**

**PUBLIC SERVICE COMMISSION**

**TESTIMONY OF JAY M. BRADBURY**

**ON BEHALF OF**

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.**

**AND TCG OHIO, INC.**

**CASE NO. 200-465**

**FEBRUARY 6, 2001**

**Q. PLEASE STATE YOUR NAME AND ADDRESS.**

**A.** My name is Jay M. Bradbury. My business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309.

**Q. PLEASE DESCRIBE YOUR CURRENT POSITION AND RESPONSIBILITIES.**

**A.** I am a District Manager in the AT&T Law and Government Affairs organization, and I provide consulting support to AT&T's business units and other internal organizations. In particular, I am involved in the negotiation and implementation of interfaces for operational support systems ("OSS") necessary to support AT&T's entry into the local telecommunications market.

1 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
2 **PROFESSIONAL EXPERIENCE.**

3 **A.** I graduated with a Bachelor of Arts degree in History from The Citadel  
4 in 1966. I have taken additional undergraduate and graduate courses  
5 at the University of South Carolina and North Carolina State University  
6 in Business and Economics. In 1987 and 1988, I participated in  
7 Advanced Management Programs at Rutgers University and the  
8 University of Houston. I earned a Masters Certificate in Project  
9 Management from Stevens Institute of Technology in 2000.

10

11 I began my AT&T career in 1970 as a Chief Operator with Southern  
12 Bell's Operator Services Department in Raleigh, North Carolina. From  
13 1972 through 1987, I held various positions within Southern Bell's  
14 (1972 - 1984) and AT&T's (1984 - 1987) Operator Services  
15 Departments where I was responsible for the planning, engineering,  
16 implementation and administration of personnel, processes and  
17 network equipment used to provide local and toll operator services  
18 and directory assistance services in North Carolina, South Carolina,  
19 Kentucky, Tennessee and Mississippi.

20

21 In 1987, I transferred to AT&T's External Affairs Department in  
22 Atlanta, Georgia where I was responsible for managing AT&T's needs  
23 for access network interfaces with South Central Bell, including the

1 resolution of operational performance, financial and policy issues.  
2 From 1989 through November 1992, I was responsible for AT&T's  
3 relationships (including the negotiation and administration of billing  
4 and marketing contracts, card honoring contracts, facility contracts,  
5 and the support of sales of Network Systems products) with  
6 Independent Telephone Companies within the South Central Bell  
7 States and Florida. From November 1992 through April 1993, I was a  
8 Regulatory Affairs Manager in the Law and Government Affairs  
9 Division and was responsible for the analysis of industry proposals  
10 before regulatory bodies in the South Central States to determine their  
11 impact on AT&T's ability to meet its customers' needs with services  
12 that are competitively priced and profitable.  
13  
14 In April of 1993, I transferred to the Access Management Organization  
15 within AT&T's Network Services Division as a Manager - Access  
16 Provisioning and Maintenance with responsibilities for on-going  
17 management of processes and structures in place with Southwestern  
18 Bell to assure that their access provisioning and maintenance  
19 performance met the needs of AT&T's Strategic Business Units. In  
20 August 1995, I became responsible for the negotiation and  
21 implementation of interfaces for operational support systems (OSS)  
22 necessary to support AT&T's entry into the local telecommunications

1 market in the BellSouth states. I assumed my current position in June  
2 1998.

3

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 **A.** My testimony explains and supports AT&T's requests for the following  
6 services from BellSouth:

7 a) A two-part procedure for ordering Operator  
8 Services/Directory Assistance ("OS/DA") in conjunction with  
9 loop-port combinations as a UNE (Issue 19);  
10

11 b) That the BellSouth OS/DA service ordered by AT&T be  
12 provided as a UNE at UNE rather than market based prices.  
13 (Issue 18);  
14

15 c) A robust Change Control Process (Issue 22);

16

17 d) Specific improvements to BellSouth's pre-ordering and  
18 ordering interfaces (Issue 23); and  
19

20 e) Specific improvements to BellSouth's maintenance and  
21 repair interfaces (Issue 24).  
22

23 My testimony demonstrates that the OSS interfaces, processes and  
24 functions currently offered by BellSouth do not comply with the  
25 Telecommunications Act of 1996<sup>1</sup>, and its implementing regulations,  
26 and explains AT&T's need for and entitlement to the services  
27 requested from BellSouth.

28

1 **Q. PLEASE DESCRIBE FURTHER THE ISSUES THAT YOUR**  
2 **TESTIMONY WILL COVER.**

3 **A.** In Issue 19, AT&T requests a specific two-part procedure for ordering  
4 Operator Services/Directory Assistance ("OS/DA") in conjunction with  
5 loop-port combinations (the Unbundled Network Element Platform or  
6 UNE-P). AT&T has requested a process by which it would place a  
7 combination of two orders. First, AT&T would place an Infrastructure  
8 Provisioning Order (or "footprint order") that would identify a specific  
9 geographic area (such as end office, rate center, LATA or state) and  
10 also would specify the network elements that AT&T would require in  
11 order to offer service throughout that area. Among other things, the  
12 Infrastructure Order would include AT&T's selection of OS/DA routing  
13 for loop-port and resale service customers calls to either (1)  
14 BellSouth's OS/DA systems on a branded or unbranded basis, or to  
15 (2) another system of AT&T's choosing. Thereafter, AT&T would  
16 place Customer-Specific Provisioning Orders, which would identify the  
17 particular features required by a specific new customer. These  
18 customer-specific orders should receive electronic processing without  
19 subsequent manual handling by BellSouth personnel. I shall refer to  
20 this issue as the Footprint-OS/DA Issue.

21  
22 In Issue 18, AT&T requests that BellSouth OS/DA (either AT&T  
23 branded or unbranded) ordered by AT&T using the process described

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<sup>1</sup> Pub.L. No. 104-104, 110 Stat. 56 (1996) hereinafter the "1996 Act".

1 in Issue 19 be provided as a UNE at UNE rates. In its UNE Remand  
2 Order, the FCC clearly requires RBOCs to provide OS/DA as a UNE,  
3 at UNE rates, unless the RBOC provides customized routing to  
4 CLECs. BellSouth does not provide customized routing through a  
5 commercially viable, timely, repeatable process and thus is required to  
6 offer and charge for OS/DA as a UNE, rather than at market based  
7 rates. I shall refer to this issue as the OS/DA Price Issue.

8  
9 In Issue 22, AT&T requests a comprehensive Change Control  
10 Process, which BellSouth has failed to provide to date. Without a  
11 comprehensive process that is both well documented and followed by  
12 BellSouth once established, to handle changes that BellSouth makes  
13 to its interfaces and processes, and to their supporting documentation  
14 (such as specifications, business rules, methods and procedures),  
15 AT&T cannot make corresponding changes in its own interfaces and  
16 processes, and its customers repeatedly encounter delay and  
17 frustration. I shall refer to this issue as the Change Control Process  
18 Issue.

19  
20 In Issue 23, AT&T requests a number of OSS improvements that have  
21 been at issue between the companies for some time. Although  
22 repeatedly requested by AT&T, BellSouth has yet to provide AT&T  
23 with the OSS functionality it provides to itself that supports the quality

1 of service enjoyed by BellSouth's retail customers. I shall refer to this  
2 issue as the Equivalent Functionality Issue.

3

4 In Issue 24, AT&T requests a full function, machine-to-machine,  
5 integrateable Maintenance and Repair interface. Such an interface is  
6 technically feasible and has been an issue between the companies  
7 and before this Commission and the FCC for a number of years. I  
8 shall refer to this issue as the Maintenance and Repair Access Issue.

9

10

## **BACKGROUND**

11

### **OPERATIONS SUPPORT SYSTEMS OBLIGATIONS UNDER THE ACT**

12

#### **13 Q. WHAT ARE OPERATIONS SUPPORT SYSTEMS ("OSS")?**

14 **A.** Operations support systems are the computer-based systems,  
15 information, databases and personnel that telecommunications  
16 carriers use to perform essential customer and business support  
17 functions, including pre-ordering, ordering, provisioning, maintenance  
18 and repair, and billing. OSS includes the automated and manual  
19 processes required to make resale services and unbundled elements,  
20 among other items, meaningfully available to competitors. Computer-  
21 based OSS enable telecommunications carriers to transmit data  
22 electronically between different systems, thereby maximizing  
23 efficiency and effectiveness in the performance of these essential

1 support functions. In addition to computer-based systems, information  
2 and databases, OSS also includes any necessary manual processes  
3 performed by personnel located in various types of “centers” when  
4 computer-based processes have not been provided or are not  
5 available. In short, good computer-based processes are not enough –  
6 BellSouth also is obligated to provide, on a nondiscriminatory basis,  
7 the manual processes involved in operating essential support  
8 functions.

9  
10 **Q. WHY DOES YOUR TESTIMONY DISCUSS BELL SOUTH'S**  
11 **MANUAL PROCESSES AND MANUAL WORK CENTERS? ARE**  
12 **NOT ALL OF BELL SOUTH'S OSS COMPUTER-BASED**  
13 **PROCESSES?**

14 **A.** No, not all of BellSouth's OSS are computer-based systems. The  
15 word “system” is synonymous with neither computers nor electronic  
16 interfaces. BellSouth's work centers and the manual procedures used  
17 by service representatives also are “systems.” Although BellSouth  
18 has an obligation to develop, implement and deploy electronic  
19 interfaces for all OSS functionalities equal to those it uses itself, it has  
20 not yet happened and may not happen for some considerable time.  
21 Moreover, BellSouth must provide nondiscriminatory operations  
22 support processes for pre-ordering, ordering, provisioning,  
23 maintenance and repair, and billing, regardless of whether or not



1 electronic interfaces have been implemented. As long as BellSouth  
2 uses manual processes as well as computer-based processes for  
3 these functions, this Commission should ensure all such processes  
4 are provided to competitors on a nondiscriminatory basis.

5  
6 **Q. HAS THE FEDERAL COMMUNICATIONS COMMISSION ("FCC")**  
7 **ADDRESSED ACCESS TO OSS UNDER THE ACT?**

8 **A.** Yes. The FCC "conclude[d] that OSS and the information they  
9 contain fall squarely within the definition of 'network element' and must  
10 be unbundled upon request under section 251(c)(3) . . . ."<sup>2</sup> The FCC  
11 reiterated this important requirement in various proceedings  
12 conducted pursuant to Section 271 of the Act.<sup>3</sup>

13  
14 In addition, the FCC concluded that OSS functions are subject to the  
15 duty imposed by Section 251(c)(3) on incumbent local exchange  
16 carriers ("LEC") to provide nondiscriminatory access to network  
17 elements, and the duty imposed by Section 251(c)(4) to provide resale

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<sup>2</sup> First Report and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 11 FCC Rod. 15499 at ¶ 516 (1996), aff'd in part and vacated in part by Iowa Utils. Bd. v. FCC, 120 F.3d 753 (8th Cir. 1997), aff'd in part and rev'd in part by AT&T Corp. v. Iowa Utils. Bd., 119 S. Ct. 721 (1999), hereinafter "FCC Local Competition Order".

<sup>3</sup> Memorandum Opinion and Order, Application of BellSouth Corp., et al. Pursuant to Section 271 to Provide In-Region, InterLATA Services in South Carolina, 13 FCC Rod. 539 (1997), hereinafter "FCC South Carolina Order" and Memorandum Opinion and Order, Application of BellSouth Corporation, et al. for Provision of In-Region, InterLATA Services in Louisiana, 13 FCC Rod. 20599 (1998), hereinafter "FCC Louisiana II Order".

1 services under just, reasonable, and nondiscriminatory conditions.<sup>4</sup>  
2 The FCC recognized that a "competing carrier that lacks access to  
3 operations support systems equivalent to those the incumbent LEC  
4 provides to itself, its affiliates, or its customers, 'will be severely  
5 disadvantaged, if not precluded altogether, from fairly competing."<sup>5</sup>  
6 The FCC reiterated these principles in its recent reviews of the Bell  
7 Atlantic and Southwestern Bell applications to enter the interLATA  
8 long distance market.<sup>6</sup>

9  
10 **Q. HOW HAS THE FCC DEFINED THE SCOPE OF A BOC'S OSS**  
11 **USED TO SUPPORT CLECS?**

12 **A.** In its Ameritech and South Carolina orders, the FCC stated that a  
13 BOC's provision of OSS functionality necessarily includes several  
14 components beginning with (1) a point of interface (or gateway); (2)  
15 any electronic or manual processing link (transmission links) between  
16 that interface and the BOC's internal operations support systems  
17 (including all necessary back office systems and personnel); and (3)  
18 all of the internal operations support systems (or "legacy systems")

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<sup>4</sup> FCC Local Competition Order ¶ 517, FCC South Carolina Order ¶ 83, and FCC Louisiana II Order ¶ 84.

<sup>5</sup> FCC South Carolina Order ¶ 82; see also FCC Local Competition Order ¶ 518; FCC Louisiana II Order ¶ 80.

<sup>6</sup> Memorandum Opinion and Order, Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, CC Dkt. No. 99-295, FCC 99-404 at ¶ 83, 1999 WL 1243135 (rel. Dec. 22, 1999), hereinafter "FCC BA-NY Order"; Memorandum Opinion and Order, Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance, CC Dkt. 00-65, FCC 00-238 at ¶ 92, hereinafter "FCC Texas SWBT Order".

1 that a BOC uses in providing network elements and resale services to  
2 a competing carrier.<sup>7</sup>

3

4 **Q. HAS THE FCC EXPLAINED WHAT CONSTITUTES**  
5 **NONDISCRIMINATORY ACCESS?**

6 **A.** Yes. In its Interconnection Order, the FCC found that  
7 nondiscriminatory access "necessarily includes access to the  
8 functionality of any internal gateway systems the incumbent employs  
9 in performing [pre-ordering, ordering, provisioning, maintenance and  
10 repair, and billing] functions for its own customers."<sup>8</sup> The FCC defined  
11 "internal gateway system" as "any electronic interface the incumbent  
12 LEC has created for its own use in accessing support systems for  
13 providing pre-ordering, ordering, provisioning, repair and  
14 maintenance, and billing."<sup>9</sup> Examples of internal gateway systems  
15 that BellSouth uses in Kentucky are the Regional Negotiation System  
16 ("RNS"), the Regional Ordering System ("ROS"), and the Trouble  
17 Analysis Facilitation Interface ("TAFI"). Accordingly, BellSouth must  
18 provide AT&T with nondiscriminatory access to the functionalities of  
19 RNS, ROS, TAFI, and other internal gateway systems.

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<sup>7</sup> Memorandum Opinion and Order, Application of Ameritech Michigan Pursuant to Section 271 to Provide In-Region, InterLATA Services in Michigan, 12 FCC Rod. 20543 at ¶ 134 (1997), (hereinafter "FCC Ameritech Order"). FCC South Carolina Order ¶ 111, Note 337.

<sup>8</sup> FCC Local Competition Order ¶ 523 (emphasis added).

<sup>9</sup> FCC Local Competition Order ¶ 523, n. 1274.

1           The FCC discussed in greater detail the incumbent LEC's obligation to  
2           provide nondiscriminatory access to OSS functions in its various  
3           orders on Section 271 applications from BellSouth and other Regional  
4           Bell Operating Companies ("RBOCs"). The FCC explained that  
5           incumbent LECs must provide access to OSS functions that  
6           sufficiently support each of the three modes of competitive entry  
7           strategies established by the Act (interconnection, unbundled network  
8           elements, and services offered for resale) and must not favor one  
9           strategy over another.<sup>10</sup>

10

11           The FCC found that "[f]or those OSS functions that are analogous to  
12           OSS functions that an incumbent LEC provides to itself -- including  
13           pre-ordering, ordering and provisioning for resale services -- a BOC  
14           must offer access to competing carriers equivalent to the access the  
15           BOC provides itself."<sup>11</sup> The FCC also found that "access to OSS  
16           functions must be offered such that competing carriers are able to  
17           perform OSS functions in 'substantially the same time and manner' as  
18           the BOC."<sup>12</sup> In addition, the FCC found that "for those OSS functions  
19           that have no retail analogue, such as ordering and provisioning of

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<sup>10</sup> FCC Ameritech Order ¶ 133.

<sup>11</sup> FCC South Carolina Order ¶ 98; see also FCC Ameritech Order ¶ 139.

<sup>12</sup> FCC South Carolina Order ¶ 98; see also FCC Louisiana II Order ¶ 87.

1 unbundled network elements, a BOC must offer access sufficient to  
2 allow an efficient competitor a meaningful opportunity to compete.”<sup>13</sup>

3

4 The FCC also found “that excessive reliance on manual processing,  
5 especially for routine transactions, impedes the BOC’s ability to  
6 provide equivalent access.”<sup>14</sup> Manual processing by BellSouth results  
7 in delay and increased error in the fulfillment of customer’s orders  
8 which negatively impacts AT&T’s ability to compete with BellSouth in  
9 providing service to its customers in substantially the same time and  
10 manner as BellSouth.

11

12 AT&T is particularly concerned about the high number of orders  
13 placed electronically that “fall out” of the electronic processing system  
14 as a result of BellSouth’s design decisions not to provide complete  
15 electronic processing for all elements and services purchased by  
16 alternative local exchange companies (“CLECs”) and the failure of  
17 BellSouth’s systems to properly process transactions for which they  
18 have been designed. Orders for which electronic processing has not  
19 been provided or that “fall out” of BellSouth’s systems due to system  
20 failure are processed manually by individual employees in one of  
21 BellSouth’s Local Carrier Service Centers (“LCSCs”). Individual  
22 employees tend to interpret BellSouth’s business rules subjectively,

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<sup>13</sup> FCC South Carolina Order ¶ 98; see also FCC Ameritech Order ¶ 141; FCC Louisiana II Order ¶ 87; FCC BA-NY Order ¶ 83, and FCC Texas SWBT Order ¶ 95.

1           which results in varying treatment of similar orders. For example,  
2           some orders will be rejected, while similar orders will not, based  
3           simply on the subjective decision of a BellSouth employee. Orders  
4           that electronically flow through BellSouth's ordering system, on the  
5           other hand, are treated the same way and are rejected or processed  
6           on a consistent basis. Thus, a high "fall out" rate (and conversely, a  
7           low flow-through rate) results in a greater number of problem orders.  
8           Additionally, the FCC has recognized that low order flow-through can  
9           "indicate a wide range of possible deficiencies in a BOC's OSS that  
10          may deny an efficient competitor a meaningful opportunity to compete  
11          in the local market."<sup>15</sup>

12

13   **Q.   WHAT ARE THE CHARACTERISTICS OF AN INTERFACE THAT**  
14   **PROVIDES NONDISCRIMINATORY ACCESS TO AN INCUMBENT**  
15   **LEC'S OSS?**

16   **A.**   For an interface to satisfy the Act's nondiscrimination requirements,  
17          the FCC consistently has indicated that the interface must  
18          demonstrate, at a minimum, the characteristics described below.  
19          Additionally, appropriate operational data and performance  
20          measurements are necessary to determine whether the proposed  
21          OSS interfaces meet these five characteristics.<sup>16</sup> An interface with the  
22          following characteristics of nondiscrimination will minimize differences

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<sup>14</sup> FCC Louisiana II Order ¶ 110.

<sup>15</sup> FCC BA-NY Order ¶ 162.

1 in OSS functional capabilities between the incumbent LEC and the  
2 CLEC:

3

4 **Electronic** -- The interface must be a machine-to-machine  
5 interface (computer application program to computer  
6 application program) that provides fully electronic interaction  
7 between the incumbent LEC's OSS and the CLEC's OSS.<sup>17</sup> A  
8 machine-to-machine interface decreases the time, reduces the  
9 cost, and improves the accuracy of an CLEC's performance of  
10 OSS functions,<sup>18</sup> while failure to deploy an application-to-  
11 application interface denies competing carriers equivalent  
12 access to pre-ordering OSS functions.<sup>19</sup>

13

14 **Functionality** -- The interface must provide all CLECs with the  
15 capability to perform the same OSS functions with at least the  
16 same level of quality, efficiency, and effectiveness that the  
17 incumbent provides to itself.<sup>20</sup> For those functions that do not  
18 have a retail analogue, the incumbent LEC must offer access to

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<sup>16</sup> See FCC Ameritech Order ¶¶ 138, 141-42, 204-213; FCC BA-NY Order ¶ 89.

<sup>17</sup> FCC South Carolina Order ¶¶ 152-66.

<sup>18</sup> FCC Louisiana II Order ¶ 96, n. 291.

<sup>19</sup> FCC South Carolina Order ¶ 166; FCC BA-NY Order ¶ 137.

<sup>20</sup> FCC Local Competition Order ¶ 523; FCC South Carolina Order ¶ 98; FCC Ameritech Order ¶ 139; and FCC Louisiana II Order ¶ 87.

1                   such OSS functions sufficient to allow an efficient competitor a  
2                   meaningful opportunity to compete.<sup>21</sup>

3

4                   **Documented** -- The interface must be documented accurately,  
5                   adequately and sufficiently in advance to allow CLECs a  
6                   reasonable opportunity to develop and deploy their own  
7                   necessary systems, work processes, and employee training to  
8                   use the interface.<sup>22</sup> Properly documented interfaces will  
9                   facilitate completion of those necessary tasks in a manner that  
10                  provides CLECs a meaningful opportunity to compete.

11

12                  **Capacity** -- The interface must have the capacity to meet  
13                  combined market volumes of all CLECs with response times  
14                  that are equivalent to those the incumbent LEC provides  
15                  itself.<sup>23</sup> Sufficient capacity will ensure that OSS interfaces do  
16                  not become a bottleneck that impedes a CLEC's ability to  
17                  compete.

18

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<sup>21</sup> FCC South Carolina Order ¶ 98; FCC Louisiana II Order ¶ 87; FCC BA-NY Order ¶ 129 and FCC Texas SWBT Order ¶ 148.

<sup>22</sup> FCC South Carolina Order ¶ 111; FCC Ameritech Order ¶¶ 137, 215; FCC Louisiana II Order ¶ 85; FCC BA-NY Order ¶ 88; and FCC Texas SWBT Order ¶ 97.

<sup>23</sup> FCC Ameritech Order ¶¶ 137, 194; FCC Louisiana II Order ¶¶ 139-40; FCC BA-NY Order ¶ 88; and FCC Texas SWBT Order ¶ 97.



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**Standards** -- The interface must comply with existing telecommunications industry standards or ease the transition to evolving standards regarding:

- What is to be communicated (message protocol component);
- Specific information to be communicated (data elements); and
- language and rules for communication (communication protocols).

Although the use of industry standards can meet the needs of a competitive local exchange market,<sup>24</sup> lack of industry standards does not excuse an incumbent LEC from meeting its obligation to provide nondiscriminatory access to OSS functions.<sup>25</sup> Similarly, deploying an interface that merely adheres to industry standards is not sufficient to demonstrate nondiscriminatory access. A BOC must provide nondiscriminatory access to its OSS functions irrespective of the existence of, or whether it complies with, industry standards.<sup>26</sup>

**ISSUE 19**  
**THE FOOTPRINT-OS/DA ISSUE**

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<sup>24</sup> FCC Ameritech Order ¶ 217; FCC BA-NY Order ¶ 88.  
<sup>25</sup> FCC South Carolina Order ¶ 121, n. 362.  
<sup>26</sup> FCC Louisiana II Order ¶ 137.

1 **Q. SHOULD BELL SOUTH PROVIDE CUSTOMIZED OS/DA ROUTING**  
2 **TO AT&T FOR ITS UNE PLATFORM CUSTOMERS THROUGH A**  
3 **PROCESS THAT ESTABLISHES COMMON (INFRASTRUCTURE)**  
4 **ELEMENTS IN ADVANCE OF CUSTOMER ORDERS AND**  
5 **CUSTOMER SPECIFIC ELEMENTS USING FLOW-THROUGH**  
6 **ORDERING?**

7 **A.** Yes. In Issue 19, AT&T requests a specific two-part procedure for  
8 ordering loop-port combinations (the Unbundled Network Element  
9 Platform or UNE-P)<sup>27</sup>, including the associated Operator  
10 Services/Directory Assistance routing. AT&T has requested a process  
11 by which it would place a combination of two orders. First, AT&T  
12 would establish routing of calls to a specific Operator Services /  
13 Directory Assistance (“OS/DA”) service or provider for a given  
14 “footprint” area, which may be as small as a single central office, or as  
15 large as an entire state. Thereafter, AT&T would place Customer-  
16 Specific Provisioning Orders, which would identify the particular  
17 features required by a specific new customer.

18  
19 The Local Service Request (“LSR”) would act as the Customer-  
20 Specific Provisioning Order. AT&T should be able to electronically

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<sup>27</sup> The Unbundled Network Element Platform consists of the combination of a UNE loop that provides connectivity between a customer's location and a BellSouth central office and a UNE port that provides access to the switching functionality available in that central office, including local, long distance and ancillary calling. The UNE-P purchaser takes on additional business relationships with other CLECs, Independent Companies, Inter-exchange Carriers, BellSouth, and other vendors including the associated financial risks. These relationships and risks are not associated with resale of BellSouth's local services.

1 submit LSRs for UNE-P, and the orders should electronically flow  
2 through BellSouth's systems and be provisioned at parity with  
3 BellSouth retail. As discussed below, electronic LSRs with flow-  
4 through ordering should be available for orders that request either an  
5 unbranded or an AT&T-branded platform.

6

7 **Q. PLEASE DESCRIBE THE OPTIONS FOR ROUTING OS/DA CALLS.**

8 **A.** When an AT&T customer picks up the telephone and dials "0" for  
9 operator service or "411" for directory assistance, the call will be  
10 directed to the OS/DA platform chosen by AT&T. The call could be  
11 routed in one of four possible ways:<sup>28</sup>

- 12 • BellSouth's OS/DA platform, to be branded as BellSouth's  
13 service ("Welcome to BellSouth"). AT&T would not use this  
14 option as a long term solution.
- 15 • BellSouth's platform to be branded as the CLEC's service  
16 ("Welcome to AT&T");
- 17 • BellSouth's platform but not branded at all ("May I help  
18 you?");
- 19 • or it could be sent to AT&T's or another provider's OS/DA  
20 platform.

21  
22 AT&T is entitled to select the routing for its customers' OS/DA calls,  
23  
24 and may decide to have more than one routing option within Kentucky.  
25

26  
27

---

<sup>28</sup> Exhibit JMB-1 visually depicts how these alternatives are provided using the three offered technologies – Line Class Codes, Originating Line Number Screening and Advanced Intelligent Network.

1 **Q. HOW DOES AT&T PROPOSE TO ACCOMPLISH ITS DESIRED**  
2 **ROUTING?**

3 **A.** There are two steps necessary to accomplish AT&T's desired routing.  
4 These steps are illustrated in Exhibit JMB-2. First, BellSouth and  
5 AT&T must agree upon a process for ordering the trunking and  
6 translations that support customized routing. Next, AT&T must inform  
7 BellSouth which routing option it has chosen to use for a specific new  
8 customer. Unfortunately, both of these steps are the subject of  
9 dispute between the parties. I will discuss each step separately.

10

11 **Q. PLEASE DESCRIBE THE FIRST STEP FOR OBTAINING AT&T'S**  
12 **DESIRED CUSTOMIZED ROUTING.**

13 **A.** As stated above, the first step in obtaining AT&T's desired customized  
14 OS/DA routing is for BellSouth and AT&T to agree upon a process for  
15 ordering customized routing. AT&T has requested the two-part  
16 ordering process I mentioned above. First, AT&T would submit to  
17 BellSouth a "footprint" order (also known as a network design request,  
18 or "NDR") that would identify the trunking and routing required to direct  
19 customers' OS/DA calls to the platform or platforms chosen by AT&T  
20 for a specific footprint area.

21

22 In Kentucky, for example, AT&T might place a footprint order for two  
23 OS/DA routing options in the major metropolitan end offices (one

1 routing to BellSouth's platform, branded as AT&T, and another to  
2 AT&T's own platform), and a separate footprint order for the other end  
3 offices in the state, specifying only one routing option (to BellSouth's  
4 platform, branded as AT&T).

5

6 Later, when AT&T ordered service for a specific new customer, it  
7 would do so by electronically submitting a Local Service Request  
8 ("LSR"), which should, in turn, be electronically processed by  
9 BellSouth. If AT&T's footprint order had specified more than one  
10 OS/DA routing option for the area in which service was to be provided,  
11 AT&T's LSR would indicate which of the two routing options to use for  
12 that customer. No such indicator would be necessary if AT&T had  
13 requested only one routing option for the area.

14

15 In the above example, then, an AT&T LSR for a new customer outside  
16 a major metropolitan area would include no indicator, because the  
17 single routing information already would have been provided to  
18 BellSouth. An AT&T LSR for a new customer in a major metropolitan  
19 area, on the other hand, would indicate which of the two previously  
20 identified routing options to use for that specific customer. This would  
21 allow AT&T the ability, for example, to route OS/DA calls from  
22 metropolitan residential customers to BellSouth's platform branded as

1 AT&T, and calls from metropolitan business customers to AT&T's  
2 platform.

3

4 **Q. YOU MENTIONED THAT THIS STEP WAS THE SUBJECT OF**  
5 **DISPUTE. PLEASE DESCRIBE THE DISPUTE AND AT&T'S**  
6 **POSITION.**

7 **A.** There are two areas of disagreement related to this step of the  
8 process. First, despite repeated requests by AT&T, BellSouth has  
9 failed to provide detailed technical information on the process  
10 BellSouth would require in order to implement each of the three  
11 OS/DA routing strategies that AT&T may use. BellSouth has  
12 repeatedly stated its willingness to provide the information to AT&T,  
13 but has not produced detailed technical methods and procedures  
14 sufficient to inform AT&T of requirements for ordering customized  
15 routing.<sup>29</sup> Without this information, AT&T cannot develop the internal  
16 systems and processes it will need to submit orders to BellSouth.  
17 AT&T asks this Commission to order BellSouth to provide such  
18 documentation by a date certain.

19

20 Recently a BellSouth witness stated that BellSouth had provided  
21 AT&T with all the necessary information in an E-mail transmittal sent  
22 on October 26, 2000. Unfortunately, that witness had been

---

<sup>29</sup> As indicated by the FCC in paragraph 223 of its Second Louisiana Order, AT&T has been attempting to get this information for over two years.

1           misinformed. The only information provided was proposed contract  
2           language that still provides none of the requested technical or  
3           methods and procedures documentation. Exhibit JMB-3.

4  
5           Next, BellSouth wishes to limit AT&T to only one customized OS/DA  
6           route, apparently for an entire state. There simply is no justification for  
7           doing so in the Telecommunications Act or in FCC orders. The FCC  
8           has determined that incumbent LECs, including BellSouth, are  
9           required to provide customized routing as part of the switching  
10          function, unless they can prove that customized routing in a particular  
11          switch is not technically feasible.<sup>30</sup> At no time during negotiations has  
12          BellSouth indicated that customized routing was not technically  
13          feasible in any of its switches.

14  
15          Further, the FCC has not limited BellSouth's obligation to provide  
16          OS/DA routing on a "one per CLEC" basis. Although BellSouth claims  
17          that certain language in paragraph 224 of the FCC's Second  
18          Louisiana Order implies that CLECs would have one routing plan on a  
19          region-wide basis, an examination of that paragraph reveals exactly  
20          the opposite: The FCC anticipated that CLECs may have more than  
21          one OS/DA routing option, and instructed BellSouth to simplify its  
22          ordering processes accordingly:

---

<sup>30</sup> FCC Local Competition First Report and Order, 11 FCC Rod at 15709.

1 We agree with BellSouth that a competitive LEC  
2 must tell BellSouth how to route its customers'  
3 calls. If a competitive LEC wants all of its  
4 customers' calls routed in the same way, it should  
5 be able to inform BellSouth, and BellSouth should  
6 be able to build the corresponding routing  
7 instructions into its systems just as BellSouth has  
8 done for its own customers. (Footnote 705) If,  
9 however, a competitive LEC has more than one  
10 set of routing instructions for its customers, it  
11 seems reasonable and necessary for BellSouth to  
12 require the competitive LEC to include in its order  
13 an indicator that will inform BellSouth which  
14 selective routing pattern to use. (Footnote 706)  
15 BellSouth should not require the competitive LEC  
16 to provide the actual line class codes, which may  
17 differ from switch to switch, if BellSouth is capable  
18 of accepting a single code region-wide. (FCC  
19 Second Louisiana Order at ¶ 224, emphasis  
20 added.)  
21

22 The footnotes are equally instructive: Footnote 705 discusses the  
23 possibility that AT&T might want all its customers' calls routed in a  
24 single fashion:

25 For example, if AT&T wants all of its customers'  
26 calls routed to AT&T's operator services and  
27 directory assistance, AT&T should be able to tell  
28 this to BellSouth once, by letter for instance, and  
29 BellSouth should be able to route the calls without  
30 requiring AT&T to indicate this information on  
31 every order.  
32

33 Footnote 706, on the other hand, discusses the possibility that AT&T  
34 may desire more than one OS/DA routing option:

35 For example, if AT&T wants some of its operator  
36 services and directory assistance calls routed to  
37 its operator services and directory assistance  
38 platform, but it wants other operator service and  
39 directory assistance calls directed to BellSouth's



1 platform, BellSouth does not know whether to  
2 route AT&T's customers' calls to AT&T's platform  
3 or its own unless AT&T tells BellSouth which  
4 option it is choosing.  
5

6 BellSouth theorizes that this paragraph (224) implies that AT&T is  
7 limited to one "default" OS/DA routing option. The FCC's plain  
8 language reveals that BellSouth is wrong.

9  
10 BellSouth has the ability to direct its own customers' OS/DA calls to  
11 different platforms, if it so desired. AT&T is entitled to access this  
12 ability and to direct its customers' calls in any way that is technically  
13 feasible.

14

15 **Q. YOU STATED THAT THE NEXT STEP IN THE PROCESS WAS**  
16 **FOR AT&T TO INFORM BELLSOUTH WHICH ROUTING OPTION IT**  
17 **HAS CHOSEN TO USE FOR A SPECIFIC NEW CUSTOMER ONCE**  
18 **BELLSOUTH HAS IMPLEMENTED ALL THE AT&T REQUESTED**  
19 **ROUTING OPTIONS. PLEASE DESCRIBE THE DISPUTE**  
20 **RELATED TO THIS ISSUE.**

21 **A.** AT&T and BellSouth disagree about the method by which AT&T will  
22 identify the OS/DA routing option it has selected for individual  
23 customers. I will therefore describe the method by which AT&T plans  
24 to identify its desired OS/DA routing option for each customer, and  
25 demonstrate that this method is consistent with (and contemplated by)

1 the FCC in its Second Louisiana Order. I also will explain that the  
2 process urged by BellSouth violates FCC guidelines and effectively  
3 would limit AT&T to only one OS/DA routing option.

4

5 **Q. PLEASE DESCRIBE AT&T'S DESIRED ORDERING METHOD.**

6 **A.** As I explained above, AT&T will first place a footprint order specifying  
7 its desired OS/DA routing options within a geographic area. Later, it  
8 will submit customer-specific LSRs. If the footprint order specified  
9 only one OS/DA routing within the geographic footprint (for example,  
10 sending all OS/DA calls to BellSouth's unbranded OS/DA platform),  
11 AT&T will have provided BellSouth with routing instructions for all  
12 LSRs submitted within that footprint, so there is no need for AT&T to  
13 place additional information on the customer-specific LSR to reiterate  
14 the OS/DA routing. This is in keeping with the FCC's reasoning in its  
15 Second Louisiana Order at footnote 705:

16 If AT&T wants all of its customers' calls routed to  
17 AT&T's operator services and directory  
18 assistance, AT&T should be able to tell this to  
19 BellSouth once, by letter for instance, and  
20 BellSouth should be able to route the calls without  
21 requiring AT&T to indicate this information on  
22 every order.  
23

24 AT&T's footprint order/ customer-specific order process is designed to  
25 comply with this guidance.

26

1 If, on the other hand, If AT&T places a footprint order that specifies  
2 two possible OS/DA routing options, then AT&T's LSR must inform  
3 BellSouth which of the two options to use for each specific customer.  
4 AT&T wishes to do so by placing an indicator on the LSR, which could  
5 be accomplished by simply completing the existing feature field in the  
6 LSR with (for example) "UB/BLS" for BellSouth unbranded, "CB/BLS"  
7 for BellSouth branded as AT&T or "C/AOSR" for another provider's  
8 platform. The indicator for each option should be the same region-  
9 wide. Again, this is consistent with the FCC's Second Louisiana Order  
10 at ¶224, footnote omitted:

11 If, however, a competitive LEC has more than one  
12 set of routing instructions for its customers, it  
13 seems reasonable and necessary for BellSouth to  
14 require the competitive LEC to include in its order  
15 an indicator that will inform BellSouth which  
16 selective routing pattern to use. BellSouth should  
17 not require the competitive LEC to provide the  
18 actual line class codes, which may differ from  
19 switch to switch, if BellSouth is capable of  
20 accepting a single code region-wide.  
21

22 **Q. IS BELLSOUTH CAPABLE OF ACCEPTING A SINGLE REGION-**  
23 **WIDE CODE FOR EACH OF THE OS/DA ROUTING OPTIONS**  
24 **REQUESTED BY AT&T?**

25 **A.** Yes, BellSouth is quite capable of accepting a single region-wide  
26 code, or indicator, for each of the three OS/DA routings that may be  
27 requested by AT&T, and has never attempted to demonstrate that it is  
28 not. In order to do so, BellSouth simply would have to build

1 translations tables for line class codes, as it has done already for its  
2 own use.

3

4 **Q. PLEASE EXPLAIN.**

5 **A.** Line class codes (“LCCs”) and routing instructions are applied at the  
6 central office level and are contained within each office’s software  
7 data tables. Exhibit JMB-1, page 1, depicts the use of LCCs to  
8 implement customized OS/DA routing for CLECs. The actual codes  
9 and data tables, however, are not uniform between central offices.<sup>31</sup>  
10 Thus, the line class codes for ordering (for example) customized  
11 OS/DA routing to BellSouth’s unbranded platform may vary among  
12 central offices, even though they provide the same instructions to the  
13 switch. Only in recent years have the RBOCs, including BellSouth,  
14 established methods and procedures to improve the administration  
15 and commonality of LCCs. BellSouth solves this problem for itself  
16 with a database known as the Line Class Code Assignment Module  
17 (“LCCAM”). LCCAM determines, from the information on the retail  
18 service request, and the identification of the central office that will be  
19 used to serve the customer’s line, the proper LCC to put on the  
20 service order.

21

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<sup>31</sup> Part of the problem associated with LCCs and their administration is the fact that prior to the Act there was no need to administer LCCs in a manner that would allow them to be used in a competitive market. Thus, there was no need to create a system of uniform LCCs, and it was not done.

1           The FCC was fully aware that LCC identifiers may be unique to central  
2           offices, and decided that requiring CLECs to enter each individual  
3           code on their orders would be an unreasonable burden.<sup>32</sup> The FCC  
4           set forth two alternatives by which competitors may order customized  
5           OS/DA routing. If a competitive provider wants all of its OS/DA calls  
6           routed in the same fashion, it may inform BellSouth once, perhaps by  
7           letter, without the need to indicate this information on each customer's  
8           order. If, on the other hand, the provider wants more than one set of  
9           routing instructions for its customers, the CLEC should provide "an  
10          indicator" on each customer's order that tells BellSouth which routing  
11          pattern to use for that customer.<sup>33</sup> As stated above, the FCC directed  
12          BellSouth to accept a single code across its region for each set of  
13          routing instructions desired by a CLEC.

14

15          On November 21, 2000, Mr. Milner (BellSouth) filed with the Georgia  
16          PSC an Affidavit in Dockets 6863-U and 7253-U, to "provide the  
17          Commission with the most current information concerning unbundled  
18          network elements, interconnection services, and resold services  
19          furnished by BellSouth."<sup>34</sup>

20

21          In paragraph 17 of his affidavit, Mr. Milner discusses Uniform Service  
22          Order Codes ("USOCs"), Field Identifier Codes ("FIDs"), the Line

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<sup>32</sup> FCC Second Louisiana Order ¶ 224.

<sup>33</sup> FCC Second Louisiana Order ¶ 224.

1           Class Code Assignment Module (“LCCAM”), a system called MARCH,  
2           and how they are used to assign Line Class Codes (“LCCs”) to  
3           customer specific service requests. Mr. Milner calls this service order  
4           flow “parity by design”<sup>35</sup> and claims that nothing in the process or  
5           resulting LCC “distinguishes a BellSouth customer from a CLEC  
6           customer.”<sup>36</sup> The “indicator” the FCC contemplated in its guidance  
7           regarding OS/DA ordering, and which AT&T is requesting, is  
8           analogous to a USOC. BellSouth provides USOCs for all other  
9           services and elements it makes available to CLECs, and USOCs are  
10          processed by LCCAM regardless of whether they are used by  
11          BellSouth or a CLEC. Mr. Milner’s affidavit demonstrates that  
12          BellSouth’s refusal to provide OS/DA routing LCCs through the use of  
13          USOCs and LCCAM for the industry as a whole and its insistence on  
14          requiring each CLEC to submit individual requests using an  
15          unspecified process is clearly arbitrary and discriminatory.

16  
17          The processes and procedures requested by AT&T are logical,  
18          technically possible, and in accord with FCC orders. BellSouth  
19          misreads the FCC’s guidance in an attempt to force a single “dictated”  
20          OS/DA routing method on AT&T rather than provide the required  
21          customized routing. The Kentucky PSC should not be misled by  
22          BellSouth’s abuse of the FCC’s guidance, but should instead order

---

<sup>34</sup> I have attached a copy of this Affidavit as Exhibit JMB-4.

<sup>35</sup> Milner Affidavit page 6.

1 BellSouth to provide the information, methods and procedures AT&T  
2 needs to determine and eventually order the customized OS/DA  
3 routing it desires, using the two-part process I have described.<sup>37</sup>  
4

5 **Q. HAS THE FCC REQUIRED BELL SOUTH TO PROCESS OS/DA**  
6 **ROUTING ORDERS ELECTRONICALLY?**

7 **A.** No. Although the FCC has not required BellSouth to abandon manual  
8 processing of customized routing orders, it noted that BellSouth would  
9 have the burden of showing that it processed such orders in an  
10 efficient and nondiscriminatory manner:

11 [W]e expect BellSouth to demonstrate that, if it  
12 requires specific information for selective routing  
13 that results in manual intervention in the  
14 processing of such orders, BellSouth will be able  
15 to process such orders in a timely manner and in  
16 volumes reflecting reasonably foreseeable  
17 demand. Of course, the easiest way for  
18 BellSouth to make this demonstration is to ensure  
19 that orders that include selective routing  
20 information do not require manual intervention.  
21 FCC Louisiana II Order ¶¶ 225.

22 BellSouth did not attempt to make such a showing in either the  
23 Georgia or North Carolina arbitration proceedings nor in its pre-filed  
24 testimony in Florida or Tennessee.

25

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<sup>36</sup> Milner Affidavit page 7

<sup>37</sup> The Kentucky PSC should note that BellSouth's position on this issue predates the FCC's LAll Order. Thus, despite the FCC's guidance, which was offered in response to these very policies, BellSouth continues to insist that CLECs follow an outmoded and duplicative set of practices designed to limit their OS/DA ordering options.

1 **Q. DOES BELLSOUTH'S OSS PROVIDE ELECTRONIC ORDERING**  
2 **FOR CUSTOMER SPECIFIC LSRS THAT REQUEST OS/DA**  
3 **ROUTING?**

4 **A.** No. By its own admission, BellSouth provides no processes for  
5 electronic ordering of customer specific OS/DA today, and has made  
6 no commitment as to when such processes might be available, if ever.

7  
8 BellSouth's recent decision to stop development of this functionality is  
9 particularly troubling. After over two years of having its requests for  
10 electronic flow through OS/DA ordering ignored, AT&T placed a formal  
11 change request with BellSouth for the capability in February 2000.

12 BellSouth accepted the request, committed resources to the project  
13 and announced to the CLEC community that the capability for  
14 electronic ordering of one custom routing option (to BellSouth's  
15 platform unbranded) would be provided in Software Release 8 on  
16 November 18, 2000. BellSouth repeatedly reaffirmed this schedule in  
17 industry meetings up to and including a meeting on September 29,  
18 2000.

19  
20 On October 11, 2000, BellSouth made the unilateral decision to  
21 remove this change from the Release. BellSouth informed the CLEC  
22 community the next day during a Requirements Review Meeting. The  
23 minutes from that meeting (Exhibit JMB-5) include the following:



1                   BST CCP advised that the OS/DA change  
2                   request would be handled outside of Release 8.0.  
3                   A new database called Originating Line Number  
4                   Screening (OLNS) is being finalized that will  
5                   provide this service in a more efficient manner. A  
6                   meeting to discuss OLNS with interested CLECs  
7                   is being coordinated for Monday, October 16,  
8                   2000. CCP also advised that the Methods and  
9                   Procedures for OLNS are still under development.  
10

11                  There were two OLNS meetings held on October 16<sup>th</sup> I have included  
12                  the minutes from both as Exhibit JMB-6. Neither meeting provided  
13                  significantly more detailed information. OLNS is useful only if a CLEC  
14                  elects to have one option for BellSouth-provided OS/DA for all of its  
15                  customers in a given state. OLNS cannot be used to route OS/DA  
16                  calls to any platform except BellSouth's. (Exhibit JMB-1, page 2,  
17                  depicts an OLNS arrangement.) A CLEC subscribing to OLNS may  
18                  send all of its customers to either BellSouth CLEC-branded service, or  
19                  BellSouth unbranded service, but cannot differentiate between  
20                  customers by (for example) sending residential customers to  
21                  BellSouth's unbranded OS/DA and business customers to BellSouth's  
22                  CLEC-branded OS/DA. Additionally, BellSouth has provided no  
23                  technical specifications or methods and procedures and no committed  
24                  implementation data. And as BellSouth's witness, Mr. Keith Milner,  
25                  testified in the Florida MCI Arbitration there is no electronic ordering  
26                  capability available for OLNS.<sup>38</sup>  
27

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<sup>38</sup> Transcript Florida PSC Docket 00649-TP, Volume 9, October 6, 2000, page 1330.

1 Given these serious deficiencies, OLNS does not meet BellSouth's  
2 obligation to provide customized OS/DA routing.

3

4 **Q. HAS THERE BEEN ANY CHANGE IN BELLSOUTH'S DECISION**  
5 **TO REMOVE ELECTRONIC OS/DA ORDERING CAPABILITY**  
6 **FROM ITS SOFTWARE RELEASES?**

7 **A.** No. During the recent Georgia Arbitration hearing, BellSouth's  
8 witness Mr. Keith Milner claimed that the communication removing  
9 electronic ordering of OS/DA from Release 8 was incorrect, and that  
10 he personally had issued a memo directing that the decision be  
11 reversed and that CLECs be so informed immediately. Exhibit JMB-7.  
12 Despite Mr. Milner's claims, BellSouth has issued no retraction or  
13 rescheduling regarding the inclusion of OS/DA ordering in Release  
14 8.<sup>39</sup>

15

16 BellSouth filed a Late Filed Exhibit with the Georgia PSC on Monday,  
17 November 13, 2000, which included the memo to which Mr. Milner  
18 referred, as well as the earlier "mistaken" memo. The memo issued  
19 as a "mistake" was sent to CLECs on October 11, announcing that the  
20 ability to electronically order routing to OS/DA had been removed from  
21 Release 8.0. The October 12 memorandum confirmed, rather than

---

<sup>39</sup> In the Georgia arbitration hearing, Mr. Milner also claimed that BellSouth had provided AT&T with the information it had requested regarding detailed technical methods and procedures for ordering customized routing. This is also incorrect. As stated in my testimony above, AT&T has yet to receive footprint ordering instructions from BellSouth.

1           contradicted, the first memo, saying, "We are only removing the  
2           Change Request for mechanizing the ordering process from Release  
3           8." Later, BellSouth reiterated its decision to remove OS/DA ordering  
4           from Release 8 during the October 25, 2000, CCP Monthly Status  
5           Meeting.

6  
7           I have provided BellSouth's Georgia Late Filed Exhibit and the  
8           Minutes of the October 25<sup>th</sup> Monthly Status Meeting as Exhibit JMB-8.  
9           BellSouth's announcement at the meeting and my objection to it are  
10          noted on page 9 of the minutes, and the action item resulting from my  
11          request to seek reinstatement of this feature is found on page 18.

12  
13          Although BellSouth's Georgia Late-Filed Exhibit states that electronic  
14          ordering now will be included in Release 8, that is not the case.  
15          BellSouth approached AT&T on Friday November 10, 2000, with a  
16          specification that, if implemented, might provide a highly restricted  
17          capability for AT&T to submit some types of orders for OS/DA  
18          electronically during the course of a "friendly test" of UNE-P. In a  
19          teleconference held on Monday November 13, BellSouth confirmed  
20          that the capability would be limited specifically to the friendly test  
21          orders. No real AT&T customer orders can be placed, no other CLEC  
22          will have any capability, only certain order types would be allowed,  
23          and only routing to BellSouth's platform as unbranded would be

1 allowed. Thus, BellSouth plans to provide only a very limited trial  
2 version of the production functionality that was cancelled.

3

4 **Q. DID BELLSOUTH'S IMPLEMENTATION OF RELEASE 8 ON**  
5 **NOVEMBER 18, 1000 INCLUDE ANY ELECTRONIC OS/DA**  
6 **ORDERING CAPABILITY?**

7

8 **A.** No. In fact, BellSouth was unable to provide even the test support  
9 capability described above. In its haste, BellSouth provided the line  
10 class codes in one office (the 5ESS in which AT&T is conducting its  
11 test) but developed the new software, screening, and lookup tables for  
12 another office (a DMS in the same wire center available to but not  
13 being used by AT&T). Thus, Release 8.0 provides no ability to  
14 electronically order any form of customized OS/DA routing – which  
15 has always been the case.<sup>40</sup> BellSouth's failure is documented in the  
16 e-mails I have attached as Exhibit JMB-9. BellSouth's failure provides  
17 stark proof that the procedures AT&T is requesting in this arbitration  
18 do not exist and are absolutely required to provide a commercially  
19 viable, timely and repeatable process.

20

---

<sup>40</sup> It is important to remember, that even had BellSouth been successful the only capability that would have existed would have be limited to AT&T's UNE-P trial, in one office, using only one interface (EDI), to provide only "unbranded" BellSouth OS/DA, could not be used with live customers (even by AT&T), and would not support all possible order types. Success would not have provided any production capability to any CLEC. It should also be noted that the provisioning of routing to "unbranded" BellSouth OS/DA does not constitute

1 **Q. HAS BELL SOUTH CORRECTED THE SITUATION YOU JUST**  
2 **DESCRIBED?**

3

4 **A.** I do not know. Mr. Milner and Mr. Pate have indicated that the situation  
5 was corrected on January 13, 2001. However, the BellSouth Account  
6 team has informed AT&T that testing of the arrangement cannot take  
7 place until an amendment to the test agreement is negotiated. The  
8 Account Team e-mail is attached as Exhibit JMB-10.

9

10 **Q. WHAT DOES AT&T REQUEST THE KENTUCKY PSC TO ORDER**  
11 **REGARDING THIS ISSUE?**

12 **A.** AT&T asks the Kentucky PSC to order BellSouth to provide AT&T with  
13 specific documented methods and procedures for each of the  
14 customized routing methods it purports to offer: unbranded at  
15 BellSouth's platform, AT&T branded at BellSouth's platform, and  
16 routed to a non-BellSouth platform using the two-part procedure  
17 requested by AT&T. The Kentucky PSC also should require BellSouth  
18 to provide AT&T with ordering capability that will allow AT&T to place  
19 individual customer orders electronically, utilizing a single region-wide  
20 indicator for each routing option. The orders should flow through, and  
21 AT&T should not be required to place line class codes on any order,  
22 nor should AT&T be required to place any indicator on orders when

---

customized routing to an alternative provider's platform, the requirement that must be met to allow market-based pricing of BellSouth's OS/DA.

1 only one arrangement exists in a given footprint area. AT&T is entitled  
2 to customized routing, and the methods it has requested are  
3 reasonable, technically feasible, and anticipated by the FCC.  
4 BellSouth should be required to provide these capabilities within 6  
5 months of the Kentucky PSC's order.  
6

## 7 **ISSUE 18**

### 8 **CUSTOMIZED ROUTING & OPERATOR SERVICES/ 9 **DIRECTORY ASSISTANCE****

10 **Q. DID THE FCC ADDRESS THE ISSUE OF CUSTOMIZED ROUTING**  
11 **IN ITS ORIGINAL LOCAL COMPETITION ORDER?**

12 **A.** Yes. In its Local Competition Order, the FCC required that “[a]n  
13 incumbent LEC must provide customized routing as part of the local  
14 switching element, unless it can prove to the state commission that  
15 customized routing in a particular switch is not technically feasible.”<sup>41</sup>

16  
17 **Q. DID THE FCC ADDRESS THIS ISSUE IN ITS UNE REMAND**  
18 **ORDER?**

19 **A.** Yes, in connection with its decision concerning Operator Services and  
20 Directory Assistance (“OS/DA”), the FCC determined that incumbent  
21 LECs remain obligated under the non-discrimination provisions of  
22 47 U.S.C. § 251(c)(3) to comply with reasonable requests from CLECs

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<sup>41</sup> Local Competition Order at 15709.

1           who purchase OS/DA to rebrand or unbrand those services, and to  
2           provide directory assistance listing updates in daily electronic batch  
3           files. However, the FCC determined that incumbent LECs are not  
4           required to unbundle their OS/DA pursuant to 47 U.S.C. § 251(c)(3),  
5           ***provided that*** the incumbent LEC provides customized routing to  
6           CLECs to allow them to route traffic to ***alternate*** OS/DA providers.  
7           Thus, the FCC requires BellSouth to provide customized routing as a  
8           pre-condition to being relieved of its obligation to offer OS/DA as a  
9           UNE.

10

11           From a practical standpoint, the customized routing architecture  
12           proposed by BellSouth must be fully implementable and available in  
13           every end office where technically feasible. It must be capable of  
14           supporting the request of any CLEC and be implementable on a  
15           central office basis in a very short period of time. It must be fully  
16           tested and clearly demonstrate that the implementation results in  
17           service equal to what BellSouth provides itself. It must be capable of  
18           supporting both branded and unbranded messaging and routing to  
19           non-BellSouth platforms.

20

21   **Q.   WHY ARE OS/DA AND CUSTOMIZED ROUTING CRITICAL TO**  
22   **AT&T?**

1   **A.**   Local operator and directory assistance services are integral  
2           components of any significant local service offering. Any CLEC must  
3           ensure that its customers can obtain the local OS/DA services that  
4           they have come to expect from the incumbent. Similarly, CLECs must  
5           have access at cost-based rates to the incumbent LECs' emergency  
6           and directory assistance listings, including timely and efficient updates  
7           of those listings, in order to provide the quality of service local  
8           customers expect.

9

10   **Q.**    **HAS BELL SOUTH PROVIDED A TIMELY CUSTOMIZED ROUTING**  
11           **SOLUTION AS REQUIRED BY THE FCC, AND THE OTHER**  
12           **STATES WHERE BELL SOUTH OPERATES SO AS TO AVOID ITS**  
13           **OBLIGATION TO PROVIDE OS/DA AS UNES?**

14   **A.**    No. BellSouth has proposed line class code solution and an intelligent  
15           network ("AIN") solution for customized routing. The proposed AIN  
16           solution has been promised by BellSouth for several years. To date,  
17           BellSouth has not delivered on its promise. While AT&T did engage in  
18           a limited AIN test in 1997 with BellSouth, BellSouth has provided no  
19           information to indicate whether the proposed AIN solution it plans to  
20           implement later this year is the same or is different than that which  
21           was tested several years ago. (Exhibit JMB-1, page 3, depicts the  
22           AIN arrangement.)

23



1 In January 1998, BellSouth and AT&T jointly performed a technical  
2 test of an AIN solution during which both parties were present at a  
3 BellSouth facility. That trial identified call setup problems that  
4 increased post-dial delay to approximately one second for operator  
5 service calls and two seconds for directory assistance calls. This  
6 means that a CLEC customer whose calls are routed to that CLEC's  
7 OS/DA platform will experience a post-dial delay that BellSouth's  
8 customers will not experience. Some of this delay is attributable to  
9 BellSouth's decision to direct all of the calls to BellSouth's AIN  
10 tandem. The AIN selective routing capability could be provided by the  
11 end office, eliminating the post dial delay associated with the  
12 tandem/hub arrangement. In addition, because AT&T will pay usage-  
13 based rates for originating calls through unbundling switching, modest  
14 increases in seconds of originating usage could, over time and  
15 thousands of calls, add up to significant costs that AT&T, but not  
16 BellSouth, will incur. To date, no CLEC operating in BellSouth's  
17 states has purchased AIN.

18

19 **Q. WHAT ARE SOME INEFFICIENCIES OF THE AIN SOLUTION?**

20 **A.** AIN was developed to enable enhanced line-based features such as  
21 selective call forwarding and multi-distinct rings, etc. It was not  
22 intended to support normal call routing and does not work well for high  
23 volume-based calling. AIN for OS/DA bypasses the intelligence of the

1 switch and requires every single call to be sent to the AIN hub before  
2 the database for routing instructions is queried. In addition, if the  
3 database is down or is slow in responding, the call will fail or be  
4 delayed. BellSouth has not clearly demonstrated that its proposed  
5 AIN solution is equal to what it provides itself.

6 **Q. WHAT OTHER SOLUTION HAS BELLSOUTH PROPOSED FOR**  
7 **CUSTOMIZED ROUTING?**

8 **A.** BellSouth has also proposed the use of line class codes to route  
9 OS/DA traffic to a third party platform.

10

11 **Q. HAS BELLSOUTH DEMONSTRATED THAT THIS PROPOSAL**  
12 **MEETS THE NECESSARY REQUIREMENTS IN ORDER FOR**  
13 **BELLSOUTH TO NO LONGER OFFER OS/DA AS AN**  
14 **UNBUNDLED NETWORK ELEMENT?**

15 **A.** No. As discussed above, while line class codes have been used to  
16 perform customized routing in a test environment, BellSouth has not  
17 yet provided sufficient information such as ordering instructions and  
18 supporting documentation to AT&T for each of the customized routing  
19 options that BellSouth must provide. AT&T and BellSouth performed  
20 limited testing of this solution in 1997. However, several key issues  
21 still remain outstanding, which I discussed in Issue 19 above. Use of  
22 LCC technology to route OS/DA calls to third party platforms is not

1 currently available through a commercially viable, timely and  
2 repeatable process.

3

4 **Q. DOES THE ORIGINATING LINE NUMBER SCREENING (“OLNS”)**  
5 **OPTION PROVIDE A CAPABILITY TO ROUTE AN CLEC’S OS/DA**  
6 **CALLS TO THE THIRD PARTY PLATFORM?**

7 **A.** No. As discussed above, OLNS can only be used to route calls to  
8 BellSouth’s OS/DA platform. The OLNS option does not provide a  
9 basis for BellSouth to claim that it has met its customized routing  
10 obligations and therefore charge market based rates for its OS/DA  
11 service.

12

13 **Q. HAS BELL SOUTH PROVIDED REASONABLE SUPPORT TO AT&T**  
14 **TO PROVIDE CUSTOMIZED ROUTING?**

15 **A.** No. BellSouth’s policy and proposed contract language precludes  
16 AT&T from obtaining customized routing that is efficient and  
17 economical. BellSouth limits AT&T and other CLECs to selecting a  
18 single “customized” routing for all of its customers across a state.  
19 Even if a CLEC agrees to a single option, BellSouth has not provided  
20 the information necessary to order that option across multiple central  
21 offices, or to order that option for an individual customer. Such a one  
22 size fits all approach precludes an CLEC from tailoring its selection of  
23 customized routing to take advantage of different (more efficient, less

1           costly) trunking options that might be available to it in different local  
2           exchange areas, LATAs and states.

3

4           While BellSouth indicates that it will allow a CLEC to have more than  
5           one option, it apparently considers that to be something beyond its  
6           obligations under the Act – which it clearly is not – and once again has  
7           provided no instructions, methods, procedures or ordering capabilities.  
8           AT&T must be able to route OS/DA calls to any specified, existing  
9           trunking arrangements. BellSouth must be able to route OS/DA calls  
10          using existing tandem architecture. BellSouth has not demonstrated  
11          that they can provide these capabilities. AT&T, as well as other  
12          CLECs, are entitled under the Act to flexible routing arrangements that  
13          will meet their current and future needs.

14

15   **Q.   AS A PRACTICAL MATTER, IS BELLSOUTH PROVIDING**  
16   **COMMERCIALLY VIABLE CUSTOMIZED OS/DA ROUTING OF**  
17   **CALLS TO NON-BELLSOUTH PLATFORMS FOR CLECS?**

18   **A.**   No. There is clearly not a commercially viable process and I do not  
19          believe there are a commercially meaningful number of installed  
20          arrangements. Mr. Milner's Georgia affidavit (Exhibit JMB-4)  
21          discussed above, provides volume information for the elements,  
22          products and services that BellSouth provides under each of the 14  
23          Section 271 Checklist Items within Georgia and across its nine-state

1 region. The discussion of customized routing, which appears in  
2 paragraphs 13-15, does not indicate that any such arrangements are  
3 in service. Mr. Milner has already testified in Florida that there are no  
4 working AIN arrangements in the nine-state region. Given BellSouth's  
5 inability to produce the process documentation that AT&T has  
6 requested in this negotiation, there appears to be a total lack of  
7 working customized OS/DA routing arrangements.

8

9 **Q. WHAT ACTION DOES AT&T REQUEST THE KENTUCKY PSC**  
10 **TAKE ON THIS ISSUE?**

11 **A.** BellSouth has not yet demonstrated that it has in place a customized  
12 routing solution that complies with all the requirements of the FCC and  
13 which allows AT&T to access OS/DA at parity with the access  
14 BellSouth has to its own OS/DA. Until BellSouth does so, the  
15 Kentucky PSC should require BellSouth to continue to provide  
16 BellSouth provided OS/DA as unbundled network elements at  
17 unbundled network element prices.

18

19

**ISSUE 22**

20

**THE CHANGE CONTROL PROCESS ISSUE**

21

22 **Q. WHAT IS A CHANGE CONTROL PROCESS?**

1    **A.**    A change control process (also known as a “change management  
2            process”) is a process used to manage changes to a system, process,  
3            or documentation so that they are made in an orderly and predictable  
4            fashion. In the recent FCC BA-NY Order at ¶ 103 and in a September  
5            27, 1999, letter to US West (Exhibit JMB-11) and hereinafter referred  
6            to as the “US West Letter”), the FCC describes the phrase "change  
7            management process" as referring to the methods and procedures  
8            that the BOC employs to communicate with competing carriers  
9            regarding the performance of and changes in the BOC's OSS system  
10          that affect CLECs' production or test environments.

11

12   **Q.    WHY IS THIS ISSUE IMPORTANT TO AT&T?**

13   **A.**    Just as BellSouth requires time to make necessary modifications to its  
14          systems and processes, AT&T and other CLECs need sufficient  
15          advance notice of such modifications to allow them to make  
16          responsive changes in their own systems and processes and thereby  
17          continue to provide service to their customers. All too often, CLECs  
18          receive little or no notice of upcoming changes. In fact, AT&T has  
19          learned of some system or process changes only when previously  
20          acceptable orders were rejected or improperly provisioned. Similarly,  
21          CLECs request changes to BellSouth's systems and processes and  
22          need an orderly and predictable method by which such change  
23          requests will be handled. Thus, the quality of BellSouth's Change

1 Control Process directly affects AT&T's ability to offer competitive  
2 service to its customers.

3

4 An extremely graphic illustration of problems resulting from  
5 inadequate change control processes occurred early this year in New  
6 York when Bell Atlantic – New York (“BA-NY”) implemented changes  
7 to its ECXpert software, which lies at the heart of its OSS system for  
8 provisioning UNE orders. These software changes were not properly  
9 managed through a robust change control process. Shortly thereafter,  
10 CLECs began reporting that BA-NY systems were losing CLEC  
11 service orders in increasingly large numbers. Despite extensive (and  
12 expensive) work-arounds, CLECs simply could not compensate for  
13 this massive problem, and tens of thousands of customers' orders  
14 were lost or delayed, including 40,000 AT&T orders.

15

16 On February 24, 2000, BA-NY finally announced that it could not  
17 correct the software problems in ECXpert, that the software was  
18 “inherently unstable and unscalable”, and that the software would be  
19 abandoned. BA-NY proposed to replace ECXpert with a new and also  
20 untested system that was developed internally by Bell Atlantic to be  
21 introduced only four days later, on February 28<sup>th</sup>. Bell Atlantic  
22 explained that haste was required because continued use of ECXpert  
23 made it impossible for Bell Atlantic to satisfy industry standards in

1 provisioning UNE orders. BA-NY further explained that it would be  
2 replacing ECXpert first in connection with LSOG 2 and then with  
3 LSOG 4, and that ECXpert would be abandoned throughout the entire  
4 Bell Atlantic operating territory

5 These problems could have been prevented by a change control  
6 process such as that being requested by AT&T. At the very least,  
7 existence of an appropriate testing environment, go/no go decision  
8 point involving CLECs, and a versioning process would have mitigated  
9 this disaster.

10

11 **Q. PLEASE DESCRIBE TYPES OF CHANGES THAT SHOULD BE**  
12 **MANAGED VIA A CHANGE CONTROL PROCESS.**

13 **A.** Every change to a BOC's OSS, supporting process, or documentation  
14 that requires responsive changes in CLEC systems or processes  
15 should be managed via an orderly and predictable change control  
16 process. Such changes include:

- 17 1) Operations changes to existing functionality that impact the  
18 CLEC interface(s) when a BOC releases new interface  
19 software;
- 20 2) Technology changes that require CLECs to meet new technical  
21 requirements when a BOC issues a software release;
- 22 3) Additional functionality changes that may be used at the  
23 CLEC's option, when a BOC releases a new interface software;



- 1           4)     Changes that may be mandated by regulatory bodies; and  
2           5)     Changes to correct defects and emergency situations.

3           In all such cases, supporting processes and documentation must be  
4           included and CLECs must have sufficient advance notice of BOC  
5           system changes to allow them to make responsive changes to their  
6           own systems.

7

8     **Q.    HAS THE FCC GIVEN BOCS AND CLECS ANY GUIDANCE ON**  
9     **THE MINIMUM ATTRIBUTES OF A SATISFACTORY CHANGE**  
10    **CONTROL PROCESS?**

11    **A.**    Yes. In both the FCC BA-NY Order and the US West Letter, the FCC  
12       describes additional characteristics of a satisfactory change  
13       management process, including:

- 14       •     CLEC participation;
- 15       •     Procedures documentation;
- 16       •     Prioritization and stratification of changes;
- 17       •     Schedules for notifications;
- 18       •     A testing environment and minimum 30 day test window for  
19       new releases;
- 20       •     A go/no go decision process to preclude premature  
21       implementation by the BOC;
- 22       •     Versioning of releases (maintaining the old version of an  
23       interface along with the new);

- 1 • Memorialization of the process, including a means by which the
- 2 process can be modified;
- 3 • Dispute resolution process for CLECs, specific to change
- 4 management disputes;
- 5 • Followed consistently over time; and
- 6 • Subject to regulatory oversight (which includes enforcement).

7

8 From the FCC's descriptions, it is clear that the entire range of  
9 transactions required between AT&T and BellSouth in order for AT&T  
10 to utilize BellSouth's network services and elements should be  
11 managed via an orderly and predictable change control process. Both  
12 electronic and manual interfaces and processes are required to  
13 establish and maintain a business relationship with BellSouth and  
14 conduct day-to-day business transactions and all such processes  
15 should be managed by an orderly and predictable change control  
16 process. Exhibit JMB-12 visually depicts a comprehensive change  
17 control process.

18

19 A comprehensive change control process should provide "cradle to  
20 grave" coverage of the life cycle of an interface or process, as well as  
21 its supporting documentation (such as specifications, business rules,  
22 methods, and procedures). Thus, the change control process should  
23 control implementation of new interfaces, management of interfaces in

1 production (including defect correction), and the retirement of  
2 interfaces. A robust change control process should provide a process  
3 for making normal changes, an exception process, an escalation  
4 process, and a dispute resolution process, with ultimate recourse to  
5 the state regulatory authority, mediation, or court adjudication.  
6 Additionally, a process should be specified which could change the  
7 Change Control Process itself.

8

9 **Q. DOES BELLSOUTH HAVE A CHANGE CONTROL PROCESS?**

10 **A.** Yes, but the process is inadequate and BellSouth frequently fails to  
11 follow it. The charter for the development of a change control process  
12 grew out of CLEC complaints to the Georgia Public Service  
13 Commission ("PSC") regarding inaccuracies and omissions in the  
14 information available to them concerning interfaces that existed in late  
15 1997. Thereafter, BellSouth and several CLECs, including AT&T,  
16 signed the Electronic Interface Change Control Process ("EICCP")  
17 document ("the change control document") in April 1998. The change  
18 control document, which was produced only as a result of regulatory  
19 "prodding" of BellSouth by the Georgia PSC, and useful at the time,  
20 was extremely limited in scope and was insufficient to meet the  
21 current and future needs of CLECs or the requirements of the FCC.  
22 For example, it encompassed only BellSouth's existing interfaces and  
23 did not apply to new interfaces until they were deployed. Thus,

1 BellSouth was free to introduce new interfaces without appropriate  
2 notice to and input from the CLECs that would use those interfaces.  
3 In February 2000, BellSouth began developing an Interim Change  
4 Control Process ("I-CCP") in response to certain findings by KPMG in  
5 the Georgia Third Party OSS Test. The I-CCP was an evolving work  
6 in progress, and BellSouth replaced the EICCP procedures with I-CCP  
7 procedures in near real-time and often without the full concurrence of  
8 the CLECs participating in the process. While the I-CCP attempted to  
9 address the shortcomings of the EICCP BellSouth's future adherence  
10 to any change control process requirements is speculative.

11  
12 The designation of the I-CCP document and process as "interim" was  
13 removed following a controversial vote taken in August 2000, despite  
14 the fact that a key section regarding defects and expedites was still  
15 only in draft form and that there was no consensus agreement  
16 regarding the contents of the remainder of the document.<sup>42</sup> BellSouth  
17 published Version 2.0 of the Change Control Process Document on  
18 August 23, 2000, and it remains the current version today.

19

---

<sup>42</sup> BellSouth issued an agenda for a Change Control conference call that included a "discussion" of the Interim Change Control Process, among other things. After the discussion, however, and at the end of the lengthy conference call, BellSouth called for a vote on whether to accept the interim process as permanent. Because there had been no notice that a vote would be taken, several participants had dropped off the call by this point, and still others were without authority to vote on behalf of their company. Despite these irregularities, however, BellSouth has refused to allow a re-vote.

1 Through their participation in the process, AT&T and BellSouth have  
2 reached agreement on many elements of change control. However,  
3 the CCP in its current form is still deficient in many areas, as will be  
4 discussed below. Version 2.0 of the CCP, dated August 23, 2000,  
5 and marked up on October 27, 2000, is attached as Exhibit JMB-13 to  
6 show changes proposed by AT&T (and in which other CLECs have  
7 concurred.) AT&T has submitted a formal Change Request to  
8 BellSouth, requesting adoption of the changes shown in Exhibit JMB-  
9 13.<sup>43</sup>

10

11 **Q. DOES BELL SOUTH'S VERSION 2.0 CHANGE CONTROL**  
12 **PROCESS ("CCP") COMPLY WITH THE FCC'S GUIDANCE?**

13 **A.** No. The CCP fails to cover all areas that should be included in a  
14 robust Change Control Process. Specifically, the I-CCP is deficient  
15 when compared to the FCC's guidance in the following ways:

- 16 • It does not adequately cover the introduction of new interfaces;  
17 (see discussion below in section a)
- 18 • It does not adequately cover retirement of existing interfaces;  
19 (see discussion below in section b)

---

<sup>43</sup> BellSouth elected not to schedule discussion of this request during regular monthly Change Review Status meetings, as called for in the existing process. Instead, BellSouth insisted that the CLECs conduct their own meeting to discuss AT&T's Change Request. All CLECs that participate in the Change Control Process were invited to the meeting, as were several BellSouth representatives. The meeting, which was held on October 27, 2000, was attended by representatives of the core group of participating CLECs, all of whom concurred in the changes shown in Exhibit JMB-13.

- 1           •       It does not provide a process for exceptions to the Change  
2                   Control Process; (see discussion below in section c)
- 3           •       It does not provide an adequate process for defect correction;  
4                   (see discussion below in section e and f)
- 5           •       It does not provide an adequate process for managing changes  
6                   to documentation and training; (see discussion below in section  
7                   d)
- 8           •       Its cycle times for all types of changes are too long; (see  
9                   discussion below in section g)
- 10          •       It does not include a firm notification schedule for all changes  
11               initiated by BellSouth; (see discussion below in section h)
- 12          •       It does not include an adequate escalation process; (see  
13               discussion below in section j)
- 14          •       It does not include an adequate dispute resolution process;  
15               (see discussion below in section i)
- 16          •       It does not provide a means to implement changes in testing  
17               procedures; (see discussion below in section k)
- 18          •       It does not provide for a pre-release testing environment; (see  
19               discussion below in section k)
- 20          •       It permits BellSouth to unilaterally cancel, reject or reclassify  
21               CLEC submitted change requests; (see discussion below in  
22               section m)

- 1 • It permits BellSouth to unilaterally implement changes on a
- 2 schedule that is inconsistent with the prioritization of requests
- 3 by the CLECs; (see discussion below in section n)
- 4 • It does not include a defined process by which the process
- 5 itself can be changed through an orderly, informed vote by all
- 6 interested parties; (see discussion below in section o) and
- 7 • It is neither binding upon BellSouth nor subject to regulatory
- 8 oversight.

9

10 Additionally, BellSouth historically failed to follow even the limited

11 process prescribed in EICCP and this behavior has continued under

12 the I-CCP and CCP. BellSouth failed to adhere to the EICCP when

13 implementing the following types of changes to its systems, even

14 though EICPP provided a process for managing them:

- 15 • New and revised edits;
- 16 • Documentation and training changes;
- 17 • Regulatory required changes; and
- 18 • Changes BellSouth wished to initiate.

19 Each such change has the potential to disrupt CLEC processes and

20 systems and adversely affect provision of service to CLEC customers.

21

22 **Q. HOW ARE CHANGE REQUESTS PROCESSED UNDER THE**

23 **CHANGE CONTROL PROCESS?**

1    **A.**    Under Version 2.0 of the CCP, a Change Review Committee  
2            composed of BellSouth and CLECs meets three or four times  
3            annually, based on a schedule prepared by BellSouth, to review and  
4            prioritize change control requests. Monthly status meetings are held  
5            between prioritization meetings. In order for Type 2-5 (non-  
6            emergency) changes to be considered at any given prioritization  
7            meeting, they must be submitted some 33 business days in advance  
8            of the meeting. Changes that are accepted for implementation at the  
9            Change Review meeting may appear in a "release package" (which  
10           lists the requests that have been targeted for a scheduled release)  
11           approximately 35 business days after the Change Review meeting,  
12           and the implementation process can begin.

13  
14           BellSouth's change control calendar establishes specific intervals for  
15           all aspects of the process, including cut-off dates for submission of  
16           change requests before a particular Change Review meeting.

17           Requests made after the cut-off date generally will be reviewed only at  
18           the next meeting. Under the current change control calendar, the  
19           minimum time between the submission of a change control request  
20           and the issuance of a "release package" is over three calendar  
21           months, and could be more than six months. That period does not  
22           include the date of actual implementation of the change. Not only is  
23           this totally inadequate to meet CLEC needs, but it also offers



1           BellSouth a competitive advantage in that BellSouth can (and often  
2           does) change its systems and processes at any time, without regard  
3           to Change Review meetings, and to the detriment of CLECs.

4

5   **Q.    COULDN'T THIS COMMISSION SIMPLY DEFER THIS ISSUE TO**  
6   **THE CLECS AND BELL SOUTH TO RESOLVE?**

7   **A.**   No. While BellSouth will argue that this is an industry issue, and that it  
8           should be managed through the Change Control Process, the fact of  
9           the matter is that BellSouth has total control over the process and may  
10          simply ignore the business needs and wishes of the CLECs.

11          BellSouth has no legally binding commitment to follow the process or  
12          to abide by any CLEC vote, and neither the Change Control  
13          Document nor the process itself is subject to regulatory oversight.

14

15          The CCP process is often described as a "collaborative" process.

16          While it is true that AT&T and the CLECs continue to work with

17          BellSouth to improve the CCP, the process is not collaborative.

18          CLECs advise what they need, BellSouth either agrees, agrees but

19          later changes its mind, or says no. In essence, BellSouth retains veto

20          power. Following is an example that illustrates BellSouth's control

21          over the process.

22

1           During the June 28, 2000, Prioritization Meeting, CLECs prioritized 23  
2           change requests for inclusion in future releases. Five were associated  
3           with pre-ordering and 18 with ordering. The existing process calls for  
4           a Release Package Meeting to be held 30 business days after the  
5           Prioritization Meeting. The purpose of a Release Package Meeting is  
6           to inform the CLECs how the prioritized changes have been  
7           scheduled for implementation over the future releases and initiate the  
8           release management project team. This meeting, which should have  
9           been held on August 14, was not held until September 18 – delaying  
10          CLEC change requests by an additional month.

11

12          Further, BellSouth did not comply with the CCP requirement that  
13          “Sizing and sequencing of prioritized change requests will begin with  
14          the top priority items and continue down through the list until the  
15          capacity constraints have been reached.” Instead, BellSouth  
16          unilaterally included only 6 items in its Proposed Release 8.0  
17          Package, none of which dealt with pre-ordering, and four of which  
18          were not highly prioritized items, including three of the lowest priority  
19          items from the ordering list. Exhibit JMB-14. Many of the items  
20          BellSouth elected not to address have been highly prioritized for  
21          implementation by the CLECs in past cycles, going back as far as two  
22          years.

23

1 In addition to its ability to control the process, BellSouth also routinely  
2 elects not to comply with its requirements. BellSouth recently  
3 released Issue 9G of BellSouth's Business Rules for Local Ordering  
4 ("BBR-LO") which it admits includes significant changes that BellSouth  
5 did not submit to the CCP. (Exhibit JMB-15) Because BellSouth  
6 circumvented the CCP, CLECs had little advance notice of the  
7 changes, and could not make the required coding and process  
8 changes by the proposed October 2, 2000, implementation date,  
9 which would result in BellSouth's systems rejecting their previously  
10 valid orders. BellSouth nevertheless refused to withdraw these  
11 unapproved changes and implemented the release on October 2,  
12 2000, causing rejection of CLEC orders. Further, the release  
13 contained programming defects (Exhibit JMB-16) that could have  
14 been avoided had BellSouth made the release available to CLECs for  
15 testing in advance of its implementation.

16

17 **Q. IS THERE ANOTHER EXAMPLE WHY THE KENTUCKY PSC**  
18 **SHOULD NOT SIMPLY DEFER THIS ISSUE TO THE CLECS AND**  
19 **BELLSOUTH TO RESOLVE?**

20 **A.** Yes, BellSouth's handling of AT&T's Change Request CR-171 (that  
21 submitted Exhibit JMB-13 to the CCP for review) demonstrates that  
22 BellSouth has the power to ignore the requirements of the CCP with  
23 impunity.

1

2

On September 9, following the procedures outlined in Section 9 of Version 2.0 of the CCP, AT&T submitted a change request to modify the change control process. Section 9 of the CCP states that such a change request is to be discussed at the next monthly Status Meeting, which was scheduled for September 27, 2000. Rather than comply with the CCP, BellSouth instead unilaterally decided to establish a new, additional meeting it calls the "CCP Process Improvement Meeting" (Exhibit JMB-17, September minutes) to be held on October 17, 2000.

11

12

At the October 17<sup>th</sup> Meeting, BellSouth introduced and entertained discussion of a number of other items related to changes that might bring about improvement of the CCP process and suggested that AT&T and the CLECs hold an additional meeting to discuss AT&T's change request before the next CCP- Process Improvement Meeting on November 1, 2000. Exhibit JMB-18 (October Minutes).

18

19

On October 27, 2000, AT&T and the CLECs (as well as invited BellSouth representatives) held the separate meeting suggested by BellSouth. During this meeting, all of the CLECs present reached agreement on the language in AT&T's Change Request. At the November 1 meeting, however, BellSouth once again effectively

23

1 deferred meaningful discussion of CR-171 until a meeting to be held  
2 on December 7, 2000 meeting. Exhibit JMB-19 and Exhibit JMB-20  
3 are the minutes of the AT&T/CLEC October 27<sup>th</sup> meeting and the  
4 November 1<sup>st</sup> meeting. The Red-line Version 2.0 of the CCP  
5 document referred to in both minutes is identical to my direct Exhibit  
6 JMB-13 and includes the language agreed to by all CLECs  
7 participating in the October 27<sup>th</sup> meeting.

8  
9 On November 5, 2000, AT&T provided BellSouth with a document that  
10 shows the language to which the CLEC community agreed on  
11 November 1, 2000. (Exhibit JMB-13). BellSouth was a participant in  
12 both the October 27<sup>th</sup> CLEC meeting, and the November 1<sup>st</sup> CCP  
13 Process Improvement Meeting, and had the latest AT&T/CLEC  
14 proposal in its possession more than 30 days before the scheduled  
15 December 7 CCP Process Improvement Meeting. However,  
16 BellSouth did not respond in any way until 5:55 PM on December 5,  
17 2000 - effectively one day before the meeting – at which time it  
18 produced a significant and substantial mark-up of the October 27  
19 document to which the CLEC's had concurred. BellSouth's response  
20 is Exhibit JMB-21

21  
22 During the December 7<sup>th</sup> meeting, BellSouth allocated three hours to a  
23 discussion of this issue. Not surprisingly, the discussion did not

1 conclude on the 7<sup>th</sup> and the issue will now next be discussed on  
2 January 10, 2001 – four months after AT&T submitted its change  
3 request.

4  
5 BellSouth's self-initiated CCP-Process Improvement Meetings may be  
6 well intentioned, and may be a useful process, but they are not part of  
7 the documented process. AT&T notes the following regarding the  
8 meetings:

- 9
- 10 1. Full consideration of AT&T's CR 171, submitted on September  
11 9, 2000, has been delayed by at least four months.
  - 12 2. Although BellSouth appears to have agreed to various changes  
13 to the CCP during these meetings, those changes have not  
14 been documented via a change request and subsequent  
15 update to the CCP Version 2.0 document as is required by  
16 Section 9 of that document.
  - 17 3. There is no documented process for reaching agreements via  
18 the CCP Process Improvement Meetings.

19  
20 Thus, BellSouth has successfully re-instituted the ad hoc process that  
21 the CCP was designed to avoid, and which resulted in the irregular  
22 adoption of Version 2.0 in the first place. Once again, BellSouth has

1 demonstrated its unique ability to circumvent the process  
2 requirements due to lack of any binding commitment.

3

4 AT&T asks this Commission to specifically order BellSouth to adopt  
5 the changes requested herein, and to specifically place the Change  
6 Control Document under its supervision. It should be no more difficult  
7 to avoid state-to-state conflicts regarding this process than any other  
8 process incorporated into an Interconnection Agreement or into  
9 BellSouth's Statement of Generally Available Terms and Conditions  
10 ("SGAT").

11

12 **Q. HAS THERE BEEN MORE RECENT ACTIVITY ASSOCIATED WITH**  
13 **CONSIDERATION OF THE CLEC'S PROPOSED CHANGES TO**  
14 **THE CCP DOCUMENT (EXHIBIT JMB-13)?**

15

16 **A.** Yes. The January 10, 2001, meeting discussed above was held, an e-  
17 mail ballot containing 34 items distributed to the CLEC community,  
18 interested CLEC have voted by return e-mail, and the publication of  
19 the next version of the CCP document is pending and will likely occur  
20 during the interval between the filing dates for direct and rebuttal  
21 testimony in this docket. Exhibit JMB-22 is the e-mail ballot that was  
22 distributed to the CLEC community. AT&T voted for each of the  
23 "Meeting Consensus" items in this ballot and for the CLEC's

1 Recommendation associated with each "Contested Consensus"  
2 item<sup>44</sup>.

3

4 A number of other items included in the CLEC proposed changes  
5 which were discussed at the January 10, 2001, meeting were not  
6 balloted, remain open, will not therefore be published in the next  
7 version of the CCP document, and will be discussed further in late  
8 February. One is worthy of mention at this time – the issue of how  
9 agreement to make changes to the document is reached. The current  
10 document is silent on this issue. BellSouth agreed to the process  
11 resulting in the current e-mail ballot on a "we will do it this time" basis,  
12 however, the CLECs participating in the January 10<sup>th</sup> meeting viewed  
13 this process as their current proposed permanent change. BellSouth  
14 attempted to ballot a 35<sup>th</sup> item using a previously provided CLEC  
15 proposal, and a BellSouth proposal that had never before been  
16 presented for consideration. BellSouth withdrew this 35<sup>th</sup> item  
17 following my protest. The e-mails associated with my protest and  
18 BellSouth's withdrawal of this item from the ballot are in Exhibit JMB-  
19 23.

20

21 The potential impact associated with the publication of the next  
22 version CCP document on this issue in this arbitration is significant.

---

<sup>44</sup> The meeting consensus and CLEC Recommendation language in the ballot therefore supercedes and replaces the language in the CLEC Proposal at Exhibit JMB-13.



1           However until the new document is actually published statements  
2           about that impact are premature. My remaining direct testimony on  
3           the CCP in this filing reflects the situation existing up to the January  
4           10, 2001, meeting and I will address the situation reflected by the next  
5           version of the CCP document in my rebuttal testimony scheduled for  
6           submission on February 20, 2001. This is consistent with the concept  
7           that the Commission should base its decision's upon the current  
8           "official" version of the CCP document.

9

10 **Q.   YOU MENTIONED THAT YOU WOULD INTRODUCE A MARK-UP**  
11 **OF VERSION 2.0 OF THE CHANGE CONTROL PROCESS**  
12 **DOCUMENT. PLEASE TELL US WHY.**

13 **A.**   Following the August 23, 2000, Monthly Status Meeting, BellSouth  
14       produced Version 2.0 of the CCP document, incorporating all of its  
15       desired changes, whether or not CLECs concurred. For example,  
16       BellSouth incorporated into Version 2.0 a draft process to which no  
17       CLEC has concurred, identified as an "expedited feature process".  
18       Version 2.0 is now the process document in use and is therefore the  
19       appropriate document to discuss in this arbitration. If BellSouth  
20       publishes an update to the CCP document before the Kentucky PSC's  
21       decision, that new version should then supplant Version 2.0 as the  
22       baseline for a decision.

23

1 The red line of Version 2.0 included with this testimony (Exhibit JMB-  
2 13) is the same as that concurred in by the CLECs on October 27<sup>th</sup>  
3 and November 1 and provided to BellSouth on November 5, 2000.

4  
5 Substantive changes appear on 41 of 72 pages of the document, but  
6 often the same change appears on multiple pages.<sup>45</sup> It is this  
7 document that the Kentucky PSC should use as its baseline in  
8 reaching its decision on this matter, as it shows the most current  
9 positions of the parties. As noted above, if BellSouth publishes an  
10 update to the CCP document, that new version should then supplant  
11 Version 2.0 as the baseline for this Authorities' decision.

12  
13 In the following discussions, I will indicate the location and general  
14 content of the revised language associated with each sub-issue under  
15 discussion. Exhibit JMB-24 provides a cross reference of revisions to  
16 sub-issues and concerns.

17  
18 **a) *introduction of new interfaces;***

19  
20 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO**  
21 **INTRODUCTION OF NEW INTERFACES?**

---

<sup>45</sup> This page count, and the page numbering reference below are valid when the red-line document is printed on an HP Laser 4 printer. Use of another printer may result in a different numbering.

1    **A.**    Certain language in the CCP effectively would allow BellSouth, rather  
2            than the CLEC community, to determine whether to the introduction of  
3            new interfaces should be managed under the CCP document. This is  
4            unacceptable; the process of developing and introducing new  
5            interfaces should be managed under the process, just as changes to  
6            existing interfaces are managed under the process. Failure to  
7            proceed under the CCP should be an exception to the process, not  
8            part of the process itself. On page 48 of Exhibit JMB-13, AT&T has  
9            proposed deleting this language and adding language specifying that  
10           BellSouth will seek to follow the CCP for all changes originated by  
11           BellSouth. I understand that there may be times when that is not  
12           possible, so I have provided language requiring BellSouth to notify  
13           CLECs as promptly as possible if it is forced to deviate from the  
14           process.

15

16    **Q.    WHY DO AT&T AND OTHER CLECS BELIEVE THAT**  
17            **BELLSOUTH'S DEVELOPMENT AND INTRODUCTION OF NEW**  
18            **INTERFACES SHOULD BE COVERED BY THE CCP?**

19

20    **A.**    New interfaces are developed to meet CLEC business needs. The  
21            best way to ensure that new interfaces and processes meet CLEC  
22            business needs is to manage their development and introduction  
23            through the CCP. BellSouth's exclusion of the development of new

1 interfaces and processes from the EICCP caused repeated  
2 deployment of interfaces and processes that did not meet CLEC  
3 needs and wasted the industry's limited resources.

4

5

6 **Q. CAN YOU PROVIDE EXAMPLES?**

7 **A.** Yes. AT&T's customers have been victimized by BellSouth's  
8 secretive development of new OSS interfaces, specifically, BellSouth's  
9 Local Number Portability Gateway ("LNP-GTWY") and the processes  
10 supporting local number portability ("LNP"). I will provide two  
11 examples.

12

13 Caller ID Display Failure: Dillard's Department Stores purchases local  
14 services from AT&T at many of its locations in BellSouth's nine-state  
15 region. Like most businesses, Dillards kept the same telephone  
16 numbers that it used when its local service was provided by BellSouth.  
17 Shortly after converting local service to AT&T, Dillards and AT&T  
18 discovered that the Dillards name was not displayed on customers'  
19 Called ID units when employees called them. This was highly  
20 unsatisfactory to Dillards, because many people simply will not answer  
21 the telephone unless they know who is calling. This problem, and the  
22 resulting dissatisfaction of AT&T's customer, could have been avoided  
23 had BellSouth's new Local Number Portability Gateway and new

1 processes supporting local number portability ("LNP") been developed  
2 and introduced through the CCP.

3

4 This matter is currently before the Tennessee Regulatory Authority as  
5 a complaint under Docket No. 00-00971, so I shall limit my discussion  
6 here to the current bottom line: This problem still has not been  
7 resolved to AT&T's satisfaction. Upon urging by AT&T, BellSouth  
8 provided a database "fix" for Dillards, and proposes a software  
9 interface connection as an interim solution to the underlying problem.  
10 AT&T objects to the interim solution, which would require AT&T and  
11 other CLECs to spend software development dollars on a "throw  
12 away" project. Moreover, BellSouth refuses to provide the temporary  
13 database "fix" for any additional telephone numbers "until AT&T has  
14 returned the completed forms necessary to allow BellSouth to begin  
15 the implementation of the [interim] mechanized solution". Exhibit  
16 JMB-25. As I stated above, these problems could have been avoided  
17 had BellSouth developed and introduced the new gateway and  
18 processes through the CCP.

19

20 Erroneous Number Reassignment: AT&T's customers also are being  
21 negatively affected by another defective process associated with local  
22 number portability that should have been avoided by open discussion  
23 in the CCP. When numbers are "ported away" from BellSouth to a

1 CLEC, BellSouth must continue to account for the status of that  
2 number in its ATLAS database. AT&T and a number of its customers  
3 have found out the hard way that BellSouth returned many ported  
4 numbers to an assignable status in ATLAS, which allowed BellSouth  
5 to reassign working AT&T numbers to new BellSouth service. AT&T's  
6 customers, of course, were outraged at what they perceived as  
7 AT&T's failure to provide adequate service. In Exhibit JMB-26, I  
8 provide a number of e-mails and letters concerning customers who  
9 were affected in October 2000, despite the fact that BellSouth  
10 implemented edits and procedures in December 1999, to eliminate  
11 this very thing.

12

13 Unfortunately, BellSouth continues its practice of developing and  
14 implementing new interfaces and processes outside of the CCP. In  
15 my discussion of Issue 24 below, I discuss three maintenance and  
16 repair interface developments that are currently underway without the  
17 aid of the CCP.

18

19

20 ***b) retirement of existing interfaces;***

21

22 **Q. WHAT CHANGES DOES AT&T REQUEST REGARDING**  
23 **RETIREMENT OF EXISTING INTERFACES?**

1    **A.**    It appears that the parties have reached agreement on a portion this  
2            issue. BellSouth's language regarding the retirement of interfaces  
3            may be found on page 48 of Exhibit JMB 12. This language has been  
4            enhanced by BellSouth and is now acceptable to AT&T.

5

6            During the October 27 and November 1, 2000 meetings, the CLECs  
7            reached consensus on additional language related to the retirement of  
8            versions of software as opposed to retirements of interfaces. This  
9            proposed language also appears beginning on page 48.

10

11           **c)    exceptions to the process;**

12

13    **Q.    WHAT CHANGES DOES AT&T REQUEST REGARDING**  
14    **EXCEPTIONS TO THE CHANGE CONTROL PROCESS?**

15    **A.**    AT&T requests a documented "exception" process for the handling of  
16            Type 2 – 5 Changes under unusual situations. AT&T's request may  
17            be found on pages 30-34 of Exhibit JMB-13 as Part 3 to Section 4 and  
18            titled "Part 3 – Types 2-5 Exception/Expedited Feature Process."<sup>46</sup>

19            In the interval between the publications of the Interim CCP Versions  
20            1.4 through 1.6, BellSouth separately proposed a draft "Expedited  
21            Feature" process. BellSouth's proposal was included in Version 2.0 in  
22            Section 5 and elsewhere despite objections from various CLECs.  
23            (Exhibit JMB-27) Although BellSouth's proposal is unacceptable as

1 written, it appears to be a foundation upon which the “exceptions”  
2 process the CLECs have been requesting can be built. AT&T has  
3 proposed modifications that would make the process acceptable.

4  
5 Adoption of AT&T’s proposed changes will provide the CLECs and  
6 BellSouth with an acceptable documented “exception” and “expedited”  
7 process for the handling of Type 2 – 5 Changes.

8

9 **d) documentation, including training;**

10

11 **Q. WHERE MAY AT&T’S DESIRED CHANGES RELATED TO THIS**  
12 **ISSUE BE FOUND AND WHAT DO THEY REQUEST?**

13 **A.** The phrase “training materials and job aids” has been added on page  
14 7 of Exhibit JMB-13 to clearly indicate that changes which will result in  
15 revisions to the training materials and job aids BellSouth produces for  
16 CLECs are included within the scope of the process. Exhibit JMB-28  
17 is a copy of KPMG’s Florida Third Party Test Exception 9 and  
18 BellSouth’s response that deals with BellSouth’s failure to document  
19 its CLEC training process. The procedures outlined in BellSouth’s  
20 response are clearly newly minted.

21

22 **e) defect correction;**

23 **f) emergency changes;**

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<sup>46</sup> Additional related changes occur on pages 11 and 12.



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21

**Q. WHAT CHANGES DOES AT&T REQUEST REGARDING DEFECT CORRECTION AND EMERGENCY CHANGES?**

**A.** In this testimony I have grouped these two sub-items together because emergency changes are a sub-set of defect correction. AT&T proposes language changes at various locations to reflect AT&T's and other CLECs' needs for a process that corrects defects in a timely manner. BellSouth's existing and proposed process (found largely in Section 5 of Version 2) remains focused on notification and contains excessively long intervals for correction. The "Draft Expedited Feature Process" proposed by BellSouth is applicable neither to defect correction nor emergency changes. AT&T's proposed language may be found on pages 34-43 of Exhibit JMB-13.

A significant change in the definition of a defect appears on page 34. This change resulted from CLEC input during the October 27<sup>th</sup> and November 1<sup>st</sup> meetings. A third bullet point was added to address the situation where the interface was working in accord with both of the conditions in the first two bullets but still produced ineffective transactions.<sup>47</sup>

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<sup>47</sup> The new language treats as a defect the situation "where technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data." The definitions of defect on pages 12 and 63 also change to include this language.

1 Adoption of AT&T's proposed changes will provide CLECs and  
2 BellSouth with a documented defect correction and emergency  
3 change process that meets their stated needs and is near parity with  
4 the processes BellSouth uses in its own retail and wholesale  
5 operations. Collectively the changes AT&T proposes here and in sub-  
6 issue (c) above combine to provided CLECs with capabilities they  
7 have been formally requesting from BellSouth since July of 1999.

8

9 ***g) an eight step cycle, repeated monthly;***

10

11 **Q. WHAT CHANGES DOES AT&T REQUEST REGARDING THE**  
12 **CHANGE CONTROL CYCLE?**

13 **A.** AT&T will concur with the number and sequence of steps contained in  
14 BellSouth's proposed Version 2 for Type 2 – 5 Change Requests, but  
15 continues its request for reduced cycle times in order to met its  
16 business needs. BellSouth's associated proposed language and  
17 AT&T's proposed modifications may be found on the following pages  
18 in Exhibit JMB-13:

19

20 **Page Nature of AT&T Proposed Change**

21 21 and 23 reduction in Step 3 interval from 20 to 10  
22 business days

1                     21 and 26    reduction in Step 7 interval from 30 to 25  
2   business days

3

4                     **h)    a firm schedule for notifications associated with changes**  
5   **initiated by BellSouth;**

6

7   **Q.   WHAT CHANGES DOES AT&T REQUEST RELATING TO**  
8                     **NOTIFICATIONS?**

9   **A.**   When BellSouth initiates Type 4 changes<sup>48</sup>, it should prepare and  
10                     distribute requirements and specifications according to the schedules  
11                     shown on page 22 of Exhibit JMB-13 and in the associated Table 4-3.  
12                     The requested interval of 90 days advance notice for distribution of  
13                     draft requirements and specifications is particularly critical as, CLECs  
14                     otherwise may not have sufficient time in which to complete required  
15                     system and process modifications on their side of the affected  
16                     interface.

17

18                     In its recent approval of the SBC 271 application for Texas, the FCC  
19                     found the inclusion of a schedule for the distribution of draft  
20                     specifications or business rules to be significant.<sup>49</sup> In its Order  
21                     approving Southwestern Bell's 271 application, the FCC discussed  
22                     with approval particular provisions of Southwestern Bell's change

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<sup>48</sup> A type 4 change is a request initiated by BellSouth.

1 control process. The FCC specifically noted that “the change  
2 agreement includes a schedule for the distribution of draft  
3 specifications, or business rules, receipt of competing carrier  
4 comments on the documentation, and distribution of final  
5 documentation that is based on the consensus of the parties.”<sup>50</sup> In  
6 contrast, BellSouth has refused to provide CLECs with draft  
7 specifications. (Exhibit JMB-29)

8  
9 In addition, on page 28 of Exhibit JMB-13, AT&T is requesting firm  
10 implementation intervals for both software-related and documentation-  
11 related issues under the normal Type 2-5 change process. The Type  
12 2-5 Exception/Expedite process, which is described in Section 4, Part  
13 3 (pages 30-35), is available for those instances in which the  
14 requested normal interval might not be appropriate.

15  
16 ***j) a process for dispute resolution including referral to state***  
17 ***utility commissions or courts;***

18  
19 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO DISPUTE**  
20 **RESOLUTION?**

21 **A.** The dispute resolution provisions found on page 55 of Exhibit JMB-13  
22 become effective if an issue is not resolved through the Escalation

---

<sup>49</sup> FCC 00-238, Order Approving SBC Communications Inc. Section 271 Application (“FCC SBC Order”), para.111.

1 Process specified in the document, so the two processes must be  
2 considered together. The use of the escalation process ensures that  
3 neither party will bring forward an issue for mediation or as a formal  
4 complaint unless it has been appropriately and jointly investigated.

5

6 ***j) a process for escalation of changes in progress.***

7

8 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO**  
9 **ESCALATION OF CHANGES IN PROGRESS?**

10 **A.** AT&T has added specific intervals on pages 50 and 53 of Exhibit  
11 JMB-13 for various steps in the escalation process, so issues with  
12 more severe CLEC impact receive faster attention, while issues with  
13 less severe impact have a longer resolution interval.

14

15 ***k) The Process of Changing the Process.***

16

17 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO THE**  
18 **PROCESS OF CHANGING THE PROCESS?**

19 **A.** The current document actually provides no procedure at all for  
20 amending or changing the change control process, and therefore  
21 repeated situations such as occurred on August 23, 2000 discussed  
22 above are likely to occur. At page 56 of Exhibit JMB-13, I have  
23 provided language that provides for an orderly, informed vote on

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<sup>50</sup> FCC Southwestern Bell Order at paragraph 111.

1 requested changes. The proposed process requires a supermajority  
2 (2/3) vote in favor of any change thus protecting BellSouth from  
3 whimsical CLEC behavior.  
4

### 5 ***Other Concerns***

6

#### 7 ***l) Testing Support and Testing***

8

9 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO TESTING**  
10 **SUPPORT AND A TESTING ENVIRONMENT?**

11 **A.** During the recent arbitration hearing between AT&T and BellSouth in  
12 North Carolina, the parties reached an agreement regarding certain  
13 changes to these sections. Unfortunately, the language in BellSouth's  
14 proposed Version 2.0 does not comport with that discussion. The  
15 mark-ups proposed by AT&T correctly memorialize that discussion  
16 and are shown on pages 8 and 57 of Exhibit JMB-13.

17

#### 18 ***m) Provision of a Trouble Number for Type 1 Events***

19

20 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO TYPE 1**  
21 **EVENTS?**

1 A. BellSouth has agreed to provide the process requested by AT&T, but  
2 that agreement is not reflected in Version 2.0. I have added  
3 supporting language for this agreement at page 18 of Exhibit JMB-13.

4

5 ***n) The Ability of BellSouth to Unilaterally Cancel or Reject a***  
6 ***CLEC Request***

7

8 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO THE**  
9 **CANCELLATION, REJECTION OR RECLASSIFICATION OF A**  
10 **CHANGE REQUEST?**

11 A. As presently written, the change control document effectively gives  
12 BellSouth up-front veto power over any change request submitted by  
13 CLECs. This is unreasonable; changes submitted by CLECs should  
14 not be subject to arbitrary cancellation or rejection by BellSouth.  
15 Instead, all Type 5 CLEC-submitted changes should progress to the  
16 Monthly Status Meeting Stage. BellSouth should provide the  
17 appropriate Subject Matter Expert and present its case for  
18 cancellation/rejection to the industry at that time. Following input from  
19 the industry, BellSouth and the originating CLEC will determine the  
20 disposition of the change request in question. Without this process,  
21 BellSouth retains up-front veto power over all CLEC change requests,  
22 thus limiting the scope and effectiveness of the process. I have added

1 supporting language for this requirement at pages 23 and 24 of Exhibit  
2 JMB-13.

3

4 **o) *Change Review – Prioritization – Release Package***  
5 ***Development and Approval***  
6

7 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO CHANGE**  
8 **REVIEW MEETINGS, PRIORITIZATION AND RELEASE PACKAGE**  
9 **DEVELOPMENT AND APPROVAL?**

10 **A.** AT&T's proposed language is shown on pages 25-27 and pages 44-  
11 47 of Exhibit JMB-13. Type 2-5 changes must drive the need for and  
12 content of future software releases in order to provide certainty to the  
13 process. The present process, however, is driven by an arbitrary  
14 release schedule developed without input from the affected CLECs or  
15 the CCP. AT&T's suggested language establishes fixed points for  
16 prioritization meetings, and requires all prioritized change requests to  
17 be assigned to specific future releases. The process requested by  
18 AT&T remains flexible, however, since change requests may be  
19 reassigned to a different software release by group consensus during  
20 any Release Package Meeting.

21

22 **Q. PLEASE SUMMARIZE AT&T'S REQUEST FOR SPECIFIC**  
23 **CHANGES TO BELL SOUTH'S CHANGE CONTROL PROCESS.**



- 1    **A.**    AT&T asks this Commission to order BellSouth to incorporate the  
2            following attributes in its Change Control Process.
- 3            1.     It should cover the following processes:
- 4                    •     changes to manual as well as electronic processes,  
5                            whether sought by BellSouth or by CLECs;  
6                    •     introduction of new interfaces;  
7                    •     billing; and  
8                    •     retirement of existing interfaces and software versions.
- 9            2.     It should provide processes for the following issues:
- 10                   •     defect correction;  
11                   •     exceptions to the Change Control Process;  
12                   •     escalation of change requests;  
13                   •     interpretation and clarification of operational  
14                            documentation; and  
15                   •     dispute resolution.
- 16            3.     It should provide for a permanent test environment and the  
17                    ability to change the testing process.
- 18            4.     It should require cycle times that produce monthly prioritization  
19                    meetings between BellSouth and CLECs and a maximum time  
20                            of 60 calendar days from submission of a Type 2-5 change  
21                            through its inclusion in a release package, with a process for  
22                            more frequent meetings as necessary.

- 1           5.     It should include a firm notification schedule for changes  
2                     initiated by BellSouth.
- 3           6.     It should be legally binding upon BellSouth and subject to  
4                     regulatory oversight to ensure that BellSouth cannot ignore  
5                     change control processes with impunity.

6

7     **Q.    WHAT DOES AT&T REQUEST THAT THE KENTUCKY PSC DO**  
8           **REGARDING THIS ISSUE?**

- 9     **A.**    AT&T requests that the Kentucky PSC correct these deficiencies by  
10           adopting the revisions to the CCP attached as Exhibit JMB-13 to my  
11           testimony in the context of whatever is the then-most-current version  
12           of the Change Control document (Version 2.0 at this writing).  
13           Adopting the Change Control Document will give it the force of law,  
14           require BellSouth to comply with its requirements, and establish a  
15           forum in which disputes can be efficiently resolved thus encouraging  
16           the more rapid development of competition in Kentucky.

17

18

**ISSUE 23**

19

**THE EQUIVALENT FUNCTIONALITY ISSUE**

20

- 21     **Q.    PLEASE EXPLAIN AT&T'S REQUEST FOR EQUIVALENT OSS**  
22           **FUNCTIONALITY.**

1    **A.**    In Issue 23, AT&T requests a number of OSS improvements that have  
2            been at issue between the companies for some time.  Although  
3            repeatedly requested by AT&T, BellSouth has yet to provide AT&T  
4            with OSS functionality it provides to itself to support the quality of  
5            service enjoyed by BellSouth's retail customers.  BellSouth enjoys the  
6            benefits of a suite of interconnected databases and computer  
7            processing systems of its own choosing and designed as best  
8            possible to enhance the efficiency and effectiveness of its operations.  
9            Even when manual processes are required, BellSouth is able to  
10           design such processes to take maximum advantage of the available  
11           computing, database, and communications power it possesses.

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13           AT&T, on the other hand, when attempting to access BellSouth's  
14           databases, computer processing, communications resources, and  
15           manual processes, is restricted by BellSouth's unwillingness to  
16           provide parity to its competitors.  Throughout the life of the existing  
17           AT&T–BellSouth Interconnection Agreement, AT&T has repeatedly  
18           sought to obtain access that would allow it to have functionality equal  
19           to that enjoyed by BellSouth.

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21           Section 251 of the 1996 Act clearly envisioned that ILECs like  
22           BellSouth might be inclined to be less than fully cooperative in many  
23           cases, and therefore authorizes state commissions to address this

1 situation through arbitration. In this Arbitration, AT&T asks the  
2 Kentucky PSC to mandate implementation of equivalent functionality  
3 for the following three conditions:

- 4 • Parsed customer service records;
- 5 • The ability to submit orders electronically for all services  
6 and elements; and
- 7 • Electronic processing after electronic ordering, without  
8 subsequent manual processing by BellSouth personnel.

9 Exhibit JMB-30 depicts the interrelationship of these conditions and  
10 AT&T's desired resolutions.

11

12 **Q. PLEASE EXPLAIN WHY AT&T REQUIRES BELLSOUTH TO**  
13 **PROVIDE PARSED CUSTOMER SERVICE RECORDS.**

14 **A.** AT&T needs this functionality in order to fully integrate its ordering  
15 systems with BellSouth's, thereby obtaining the functionality now  
16 available to BellSouth. BellSouth's internal systems parse the  
17 sections and fields of the CSR as needed to meet software program  
18 requirements, thus precluding the need for service representatives to  
19 re-enter CSR information when processing orders. Additionally,  
20 BellSouth should provide parsed customer service records for  
21 preordering pursuant to industry standards. Parsing rules for CSRs  
22 have been included in industry standards since the publication of the  
23 LSOG3/TCIF9 guidelines July, 1998.

1

2 **Q. PLEASE EXPLAIN WHAT YOU MEAN WHEN YOU SAY THAT**  
3 **AT&T WANTS BELLSOUTH TO PROVIDE PARSED CUSTOMER**  
4 **SERVICE RECORDS.**

5 **A.** We are asking BellSouth to provide us with electronic customer  
6 service record data that is divided up into fields that BellSouth's  
7 systems can recognize when we return it to BellSouth. For example,  
8 BellSouth provides us with the customer's listed name as one field, or  
9 block, of data. But when we order listing service for that customer,  
10 BellSouth requires us to enter the customer's name in at least two  
11 fields instead of one. So we have to separate the information  
12 manually, which takes time and costs extra money. BellSouth's  
13 service representatives do not have to do this, so AT&T is requesting  
14 (and is entitled to) the same functionality.

15

16 **Q. PLEASE EXPLAIN WHY AT&T REQUIRES THE ABILITY TO**  
17 **SUBMIT ORDERS ELECTRONICALLY.**

18 **A.** BellSouth can place an electronic order for every service and product  
19 that it provides to its own customers. AT&T requires this same ability  
20 in order to compete against BellSouth. Lack of electronic ordering  
21 increases the possibility of errors, extends intervals, increases costs,  
22 and reduces CLECs' ability to compete due to the required (but

1 unnecessary) manual intervention by both CLEC and BellSouth  
2 personnel.

3

4 Although I have listed electronic ordering as a desired functionality,  
5 the ability to submit orders electronically for all services and elements  
6 and the ability to have all electronically submitted orders processed  
7 without subsequent manual intervention, which is discussed below,  
8 are sequentially and dependently related - it is impossible to have the  
9 second ability until the first has been provided. Ideally, both should be  
10 provided simultaneously because BellSouth possesses both  
11 capabilities for every service and product that it provides to its own  
12 customers.

13

14 BellSouth has argued that it already offers equivalent functionality to  
15 AT&T because BellSouth uses some manual steps in its own internal  
16 processes. But the manual processes BellSouth describes involve  
17 pre-ordering, not ordering. Further, BellSouth has admitted that its  
18 service representatives can order every retail service electronically.  
19 AT&T seeks that same ability. Despite BellSouth's own capabilities,  
20 however, it has continually refused to provide fully electronic ordering  
21 capability to CLECs, let alone fully automated processing of  
22 electronically submitted orders, despite the fact that it provides these  
23 capabilities to itself.

1

2 **Q. PLEASE EXPLAIN WHY AT&T REQUIRES ELECTRONIC**  
3 **PROCESSING AFTER ELECTRONIC ORDERING, WITHOUT**  
4 **SUBSEQUENT MANUAL HANDLING BY BELL SOUTH**  
5 **PERSONNEL.**

6 **A.** The short answer is because this is how BellSouth's own orders are  
7 processed and that without parity AT&T and the other CLECs cannot  
8 be competitive in the market place. Because electronic ordering and  
9 processing is less expensive, faster, and less prone to errors than  
10 manual ordering and processing, BellSouth's electronic ordering and  
11 processing capability puts CLECs at a competitive disadvantage.

12

13 **Q. HOW DOES BELL SOUTH PROCESS ITS OWN SERVICE**  
14 **REQUESTS?**

15 **A.** Exhibit JMB-31 depicts the methods by which BellSouth submits its  
16 customers' requests to its legacy computer systems. In Kentucky,  
17 BellSouth uses the Regional Negotiation System ("RNS") as the  
18 primary front-end system to input residential service requests and  
19 uses the Regional Ordering System ("ROS") as the front-end system  
20 for all business service requests<sup>51</sup>. The legacy system to which both

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<sup>51</sup> The system that ROS replaced during 1999, the Service Order Negotiation System ("SONGS"), has been retained by BellSouth for two purposes since it can be used to input any type of service request (business, residential, or UNE). These two uses are as a secondary input system in BellSouth retail residence operations, and as the interface used in the Local Carrier Service Center ("LCSC") to input CLEC manual and electronically submitted "designed fallout" local service requests.

1 RNS and ROS send their requests is the Service Order Control  
2 System ("SOCS"). SOCS assigns service order numbers to each  
3 request and processes all requests received through an edit program  
4 known as the Service Order Edit Routine ("SOER"). If, and only if, the  
5 service request passes the SOER edits does it actually become a  
6 service order, which SOCS then can provide to BellSouth's  
7 downstream provisioning legacy systems. A service request that has  
8 become a service order is said to be an "Assignable Order" and is  
9 referred to as having reached "AO" status. A service request that  
10 does not pass the SOER edits is rejected and returned to the  
11 originating BellSouth input center for correction.

12

13 In order to minimize the number of RNS and ROS service requests  
14 that are rejected by the SOER edits in SOCS, BellSouth has provided  
15 editing and formatting software in RNS and ROS. This software  
16 prevents BellSouth employees from sending service requests that  
17 have certain errors. In the RNS system, these software programs are  
18 known as the FID and USOC Edit Library<sup>52</sup> ("FUEL") and the Service  
19 Order Layout and Assembly Routine ("SOLAR"). In the newer ROS  
20 UNIX application this edit software is not separately identified.

21

22 Once a BellSouth representative has gathered and arranged all of the  
23 information necessary to place a service request on behalf of a



1           BellSouth retail customer, a process known as pre-ordering, the  
2           employee types the order into RNS or ROS. If the pre-ordering  
3           information is accurate and the employee has made no input errors,  
4           the service request will pass the RNS or ROS edits, be forwarded to  
5           SOCS, pass the SOER edits, obtain AO status and be distributed as  
6           necessary to BellSouth's downstream legacy systems.  
7           Thus, barring error, all BellSouth services and products can be  
8           requested and ordered as the result of the typed input of a single  
9           employee. AT&T seeks this same capability, which I shall refer to as  
10          "Flow-through Ordering".

11

12   **Q.   DOES BELL SOUTH PROVIDE FLOW-THROUGH ORDERING FOR**  
13   **ALL SERVICES AND ELEMENTS TO AT&T AND THE OTHER**  
14   **CLECS, AS IT DOES FOR ITSELF?**

15   **A.**   No. BellSouth has provided Flow-Through Ordering for some services  
16          and elements, but many other services and elements must be  
17          manually ordered, manually processed, or both.

18

19   **Q.   PLEASE EXPLAIN HOW BELL SOUTH RECEIVES AND**  
20   **PROCESSES CLEC SERVICE REQUESTS.**

21   **A.**   Exhibit JMB-32 depicts the methods by which BellSouth processes  
22          service requests submitted by CLECs into service orders. CLECs  
23          each have their own front end systems to prepare their service

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<sup>52</sup> FID stands for Feature Identification, USOC for Uniform Service Order Code.

1 requests, which then are sent to BellSouth using one of three  
2 electronic interfaces: the Electronic Data Interchange (“EDI”), the  
3 Telecommunications Application Gateway (“TAG”) or the Local  
4 Exchange Navigation System (“LENS”). Both EDI and TAG are based  
5 on industry standards, while LENS is proprietary to BellSouth.  
6 Because the requests are sent to BellSouth in a Local Service  
7 Request (“LSR”) format, which is different from the formats generated  
8 by RNS and ROS, BellSouth uses a suite of hardware and software  
9 systems and programs to convert the CLEC LSRs into formats that  
10 SOCS can recognize. The SOCS system that processes the CLEC  
11 service requests is exactly the same SOCS that processes a  
12 BellSouth service request, and it applies the very same SOER edit to  
13 CLEC service requests before either rejecting the request or allowing  
14 it to reach Assignable Order status.

15  
16 The suite of hardware and software systems and programs that  
17 BellSouth has built between the CLECs and SOCS was designed by  
18 BellSouth from end-to-end and is not controlled by any industry  
19 standards, which relate only to communications between the EDI and  
20 TAG portions of the interface. Once a CLEC service request has  
21 been received and accepted by the EDI or TAG gateway, BellSouth  
22 first sends it to a Router that simply determines whether or not the  
23 service request includes Local Number Portability (“LNP”). Service

1 requests including LNP are then routed to the LNP Gateway, while all  
2 others are routed sequentially to the Local Exchange Ordering (“LEO”)  
3 and Local Exchange Service Order Generator (“LESOG”) systems for  
4 editing and formatting. The LNP Gateway performs edits and  
5 formatting for service requests that include LNP, and it also  
6 communicates the unique LNP elements of the request to the national  
7 LNP Service Management System (“SMS”) which is external to  
8 BellSouth.

9  
10 Once service requests are formatted by LEO/LESOG or the LNP  
11 Gateway they are forwarded to SOCS, but BellSouth has not  
12 programmed LEO/LESOG and the LNP Gateway to format all  
13 electronically submitted CLEC service requests into SOCS-readable  
14 requests. Instead, BellSouth designed these components to cause  
15 many orders to “fall out” of the electronic system, requiring manual  
16 processing. Additionally, LEO/LESOG, the LNP Gateway, and SOCS  
17 do not always perform as they should: they route a number of  
18 perfectly valid CLEC service requests to manual processing when  
19 they should not.

20  
21 Thus, electronically submitted electronic service requests may receive  
22 manual processing 1) because BellSouth has not designed its system  
23 to process the request, which is known as designed Manual Fall Out

1 or 2) because BellSouth's systems fail to perform as designed, which  
2 is known as BellSouth-Caused System Failure. Manual processing is  
3 undesirable because, as the FCC has repeatedly recognized, manual  
4 processing limits reliability by increasing errors, increasing installation  
5 intervals, and increasing costs.

6

7 **Q. IS IT POSSIBLE TO QUANTIFY THE IMPACT OF DESIGNED**  
8 **MANUAL FALL OUT AND BELL SOUTH-CAUSED SYSTEM**  
9 **FAILURES ON CLEC LOCAL SERVICE REQUESTS?**

10 **A.** Yes, in January 2000, BellSouth began providing additional data  
11 concerning the level of Manual Fall Out and BellSouth-Caused  
12 System Failure experienced by CLEC service requests. This data is  
13 now available for each of the three interfaces (LENS, TAG and EDI)  
14 and by four groupings of products and services (Local Number  
15 Portability ("LNP"), UNEs, Business Resale, and Residence Resale).  
16 In Exhibit JMB-33, I have extracted from BellSouth's May 2000  
17 through October 2000 Flow-Through Reports five key data points for  
18 each interface and product combination and calculated five measures  
19 of Manual Fall Out, System Failure, and Flow-Through Ordering.

20

21 As I explain below, BellSouth's data clearly shows that electronically  
22 submitted CLEC LSRs, particularly those for LNP, UNE or business  
23 products have low maximum flow-through rates, that the maximum

1 flow-through rates for the products AT&T is ordering are even lower,  
2 and that both of these results are due to BellSouth's design decisions,  
3 and the failure of BellSouth's interfaces to perform as designed.

4

5 The data points and their definitions shown in Exhibit JMB-33 are as  
6 follows:

- 7 • Total Mechanized LSRs – the number of CLEC Local Service  
8 Requests submitted electronically.  
9
- 10 • Manual Fall Out – the number of CLEC Local Service Requests  
11 submitted electronically that by BellSouth's design are routed for  
12 manual processing.  
13
- 14 • Validated LSRs – the number of CLEC Local Service Requests  
15 submitted electronically which do not contain a CLEC auto  
16 clarification error<sup>53</sup> and for which BellSouth has designed  
17 automated processing.  
18
- 19 • BellSouth-Caused System Failures – the number of CLEC Local  
20 Service Requests that were submitted electronically and became  
21 validated LSRs, but which BellSouth's systems failed to process,  
22 and were instead routed to manual handling.  
23
- 24 • Flow-Through Issued Service Orders – the number of CLEC Local  
25 Service Requests submitted electronically that are forwarded to  
26 SOCS without BellSouth human intervention.  
27

28 The measurements and their definitions are as follows:

- 29 • % Manual Fall Out – LSRs – The percentage of CLEC LSRs  
30 subjected to manual processing by BellSouth's design decisions,  
31 calculated by dividing Manual Fall Out by Total Mechanized LSRs.

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<sup>53</sup> An auto clarification error is an input error made by an CLEC that BellSouth's systems have been programmed to find and return automatically without human intervention.

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- % BellSouth System Failure – LSRs – The percentage of CLEC LSRs subjected to manual processing because BellSouth's systems fail to perform as designed, calculated by dividing BellSouth-Caused System Failures by LSRs.
- % Total BellSouth Fall Out + Failure – LSRs – The total percentage of CLEC LSRs subjected to manual processing by BellSouth causes, calculated as the sum of the two previous measures.
- % Maximum Flow Through CLEC Orders – 100% - the % Total BellSouth Fall Out + Failure – LSRs. The maximum possible percentage of electronically submitted CLEC LSRs that would be Flow Through processed if CLECs make absolutely no input errors.
- % BellSouth System Failure – VLSR – The percentage of validated LSRs, which BellSouth's systems have been designed to process, that encounter unexpected failures, calculated by dividing BellSouth-Caused System Failures by Validated LSRs.

As discussed above, barring input error by its employees, BellSouth has Flow Through Ordering capability for 100% of the products and services it provides to its retail customers. The interfaces BellSouth provides to CLECs simply do not provide CLECs with the same capability. With the exception of residential resale service, only one-third to two-thirds of CLECs' error-free LSRs can be processed on a Flow Through basis.

I reviewed BellSouth's data For October 2000, and determined that CLECs' maximum possible Flow Through opportunity – even if they

1 had submitted every service request with absolutely no input errors –  
 2 was as low as 26%. For example, if CLECs had submitted 100 valid,  
 3 error free orders for Local Number Portability (“LNP”) over the TAG  
 4 gateway in October of this year, only 26 of them would have flowed  
 5 through to SOCs.  
 6

<b>% Maximum Flow Through CLEC Orders October 2000</b>				
<b>Interface/ Product</b>	<b>LNP</b>	<b>UNE</b>	<b>Business Resale</b>	<b>Residence Resale</b>
<b>TAG</b>	<b>26%</b>	<b>66%</b>	<b>47%</b>	<b>95%</b>
<b>EDI</b>	<b>38%</b>	<b>39%</b>	<b>27%</b>	<b>65%</b>
<b>LENS</b>	<b>NA</b>	<b>61%</b>	<b>53%</b>	<b>88%</b>

7  
 8 Only in the Residence Resale product grouping does any interface  
 9 provide any acceptable level of Flow Through Ordering capability to  
 10 CLECs. This is because the total percentage of CLEC LSRs  
 11 subjected to manual processing by BellSouth causes (% Total  
 12 BellSouth Fall Out + Failure – LSRs, shown in the table below), is  
 13 unacceptably high for all interface/product combinations except  
 14 TAG/Residence Resale:

1

<b><u>% Total BellSouth Fall Out + Failure – LSRs October 2000</u></b>				
<b>Interface/ Product</b>	<b>LNP</b>	<b>UNE</b>	<b>Business Resale</b>	<b>Residence Resale</b>
<b>TAG</b>	<b>74%</b>	<b>34%</b>	<b>53%</b>	<b>5%</b>
<b>EDI</b>	<b>63%</b>	<b>61%</b>	<b>73%</b>	<b>35%</b>
<b>LENS</b>	<b>NA</b>	<b>39%</b>	<b>47%</b>	<b>12%</b>

2

3 Each electronically submitted LSR represented by the percentages in  
4 these tables was touched by both the CLEC that originated the  
5 request and by BellSouth. BellSouth, and BellSouth alone, controls  
6 the two components (manual fallout and system failure) that generate  
7 the low maximum flow-through percentages shown in the table above.

8

9 The table below shows the incidence of manual fallout and system  
10 failure for various product lines across interfaces for October of this  
11 year. Curiously, the rate of system failure varies across interfaces:

<b><u>Variance Manual Fall Out / System Failure – October 2000</u></b>				
<b>Interface/ Product</b>	<b>LNP</b>	<b>UNE</b>	<b>Business Resale</b>	<b>Residence Resale</b>



<b>TAG</b>	<b>48% manual fallout/ 26% system failure</b>	<b>18% / 15%</b>	<b>42% / 11%</b>	<b>3% / 2%</b>
<b>EDI</b>	<b>26% / 37%</b>	<b>57% / 4%</b>	<b>66% / 7%</b>	<b>6% / 29%</b>
<b>LENS</b>	<b>NA</b>	<b>20% / 19%</b>	<b>25% / 23%</b>	<b>6% / 6%</b>

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The variance in system failure rates between the interfaces when processing service requests for the same product grouping is difficult to understand. As shown in Exhibit JMB-32, the LEO/LESOG, LNP Gateway and SOCS systems in which these failures actually occur are common to all three TAG, EDI, and LENS interfaces, so one would expect the system failure rates to be the same or at least similar.

These system failure rates become even more significant when one considers that the failures occur on service requests that the systems were specifically designed to process. The table below (% BellSouth System Failure – VLSR) captures this situation. It shows the percentage of validated LSRs, which BellSouth's systems were

1 designed to process, but which nevertheless encounter unexpected  
2 failures. In October the various interfaces performed as follows:  
3

<b>The % BellSouth System Failure – VLSR – October 2000</b>				
<b>Interface/ Product</b>	<b>LNP</b>	<b>UNE</b>	<b>Business Resale</b>	<b>Residence Resale</b>
<b>TAG</b>	<b>53%</b>	<b>34%</b>	<b>29%</b>	<b>3%</b>
<b>EDI</b>	<b>53%</b>	<b>61%</b>	<b>25%</b>	<b>41%</b>
<b>LENS</b>	<b>NA</b>	<b>39%</b>	<b>36%</b>	<b>7%</b>

4

5 The table reveals that:

- 6
- The EDI interface failed to process 25% to 61% of the validated  
7 local service requests it was designed to process;
  - The TAG interface failed to process 3% to 53% of the validated  
8 local service requests it was designed to process; and
  - The LENS interface failed to perform as designed 7% to 39% of  
9 the time.
- 10
- 11

12 It is simply not credible to argue that such performance can be  
13 providing nondiscriminatory treatment to CLECs ordering services and  
14 elements from BellSouth in order to compete with BellSouth.

1

2 **Q. IS THERE ANY EVIDENCE OF IMPROVEMENT IN THESE**  
3 **RESULTS OVER TIME?**

4 **A.** No. In Exhibit JMB-34, I show the maximum possible flow through  
5 results from May through October for each of the four product groups  
6 (LNP, UNE, Business, Residence) and three ordering interfaces (EDI,  
7 TAG, LENS). There is no significant or consistent improvement trend.  
8 In fact, in September results for two combinations (TAG used for LNP  
9 and EDI used for UNE) are at all time lows. An accurate general  
10 statement would be that there is no apparent trend toward  
11 improvement and that in fact there appears to be degradation in some  
12 results since July (LNP-TAG, UNE-EDI, BUS-LENS, RES-EDI). I will  
13 provide updated data for Exhibits JMB-33 and JMB-34 with my  
14 rebuttal testimony and at the hearing reflecting all data current at that  
15 time.

16

17 **Q. HOW DOES AT&T'S FLOW THROUGH EXPERIENCE COMPARE**  
18 **WITH THE CLEC AGGREGATE YOU HAVE PRESENTED?**

19 **A.** I have performed additional analysis comparing flow through data for  
20 AT&T and the aggregated CLEC data shown above. The full results  
21 of my additional analysis is shown in Exhibit JMB-35. Based on this  
22 additional analysis, it is obvious that the flow through capabilities

1 available to AT&T from BellSouth are inferior to those available to the  
 2 CLECs as a whole.

3

4 On page one of Exhibit JMB-35 I have compared CLEC Aggregate  
 5 and AT&T specific data concerning 1) Designed Manual Fallout, 2)  
 6 BellSouth System Error, 3) Total Fallout Caused by BellSouth, and 4)  
 7 the resulting Maximum Possible % Flow-Through for May through  
 8 October. Maximum Possible % Flow-Through is determined by  
 9 subtracting Total % Fallout Caused by BellSouth from 100%.

10

11 This table presents the Maximum Possible % Flow-Through results for  
 12 AT&T's LNP, UNE and Business LSRs.<sup>54</sup>

13

**Maximum Possible % Flow-Through Comparison**

<b>Product</b>	<b>LPN</b>	<b>UNE</b>	<b>Business (Resale)</b>
<b>Measure / Month</b>	<b>CLEC/ AT&amp;T</b>	<b>CLEC/ AT&amp;T</b>	<b>CLEC/ AT&amp;T</b>
<b>Maximum Possible % Flow-Through</b>			
• May	32% / <b>33%</b>	65% / <b>18%</b>	49% / <b>67%</b>
• June	37% / <b>19%</b>	68% / <b>20%</b>	53% / <b>70%</b>
• July	37% / <b>19%</b>	65% / <b>18%</b>	53% / <b>41%</b>
• August	37% / <b>16%</b>	66% / <b>11%</b>	52% / <b>11%</b>
• September	34% / <b>26%</b>	62% / <b>8%</b>	50% / <b>55%</b>
• October	36% / <b>26%</b>	65% / <b>13%</b>	49% / <b>70%</b>

14

<sup>54</sup> AT&T does not actually order any Resale Business services. The LSRs BellSouth reports in this category are directory listing orders associated with UNE services.

1 It is obvious from this data that the flow through capabilities available  
 2 to AT&T from BellSouth are inferior to those available to the CLECs as  
 3 a whole.

4  
 5 Because AT&T uses only the EDI interface to place LSR's, I carried  
 6 my analysis one step further and compared only data associated with  
 7 EDI transactions. Here I used official flow-through data as reported by  
 8 BellSouth. BellSouth calls this result its "CLEC Error Excluded Flow-  
 9 through", in my analysis I label this result "System Potential Flow-  
 10 Through" or "Potential EDI" on pages 2-9<sup>55</sup>. This table compares  
 11 Aggregate CLEC EDI results to AT&T EDI results.

12

Product Measure/ Interface	LPN		UNE		Business (Resale)	
	CLEC	AT&T	CLEC	AT&T	CLEC	AT&T
Potential EDI						
May	45%	0%	38%	8%	54%	57%
June	51%	0%	58%	13%	64%	100%
July	53%	0%	58%	3.4%	51%	100%
August	45%	0%	89%	29%	53%	0%
September	40%	0%	26%	19%	66%	43%
October	46%	67%	87%	40%	69%	60%

13

14 Again, it is obvious that the capabilities available to AT&T from  
 15 BellSouth are inferior to those available to the CLECs as a whole.<sup>56</sup>

<sup>55</sup> In the Exhibit (JMB-35) I produce data for three calculations, Basic, Achieved, and Potential as described on page 2. Here I use only the Potential data.

<sup>56</sup> It would appear that AT&T's results for Business are better than the CLEC results, but this is a false depiction for two reasons, 1) AT&T's "business" orders are directory listings only and 2) the flawed understanding of the meaning of the "Potential" measurement.

1           What is not so readily obvious is why. The reason is because AT&T's  
2           orders are being subjected to higher rates of Designed Manual Fallout  
3           and BellSouth System Errors.

4  
5           • AT&T's LNP orders encountered Designed Manual Fallout of 67%,  
6           74%, 81%, 84%, 74%, and 74% respectively, during the months  
7           May through October.  
8

9           • AT&T's UNE orders encountered Designed Manual Fallout of 62%,  
10          60%, 49%, 81%, 76%, and 80% as well as BellSouth System Error  
11          rates of 20%, 20%, 33%, 8%, 16%, and 7%.  
12

13          • AT&T's "Business" orders encountered Designed Manual Fallout of  
14          0%, 30%, 59%, 83%, 9%, and 15% as well as BellSouth System  
15          Errors of 33%, 0%, 0%, 8%, 36%, and 15%.<sup>57</sup>  
16

17          BellSouth's system design and operational performance discriminates  
18          against CLECs using LNP and UNE products as the basis of their  
19          market entry. I will provide updated data for Exhibit JMB-35 at the  
20          hearing.

21

22       **Q.   WHAT HAPPENS TO AN AT&T OR OTHER CLEC'S LSR WHEN IT**  
23       **ENCOUNTERS EITHER DESIGNED MANUAL FALLOUT OR**  
24       **BELLSOUTH SYSTEM ERROR?**

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<sup>57</sup> Regardless of any other conditions, whenever there are any number of issued service orders, and a zero (0) percent of BellSouth System Errors, BellSouth's flawed calculation will produce a 100% result.

1    **A.**    BellSouth routes the LSR to the Local Carrier Service Center (“LCSC”)  
2            for manual processing. This causes delay and increases the  
3            probability of input and provisioning error.

4  
5    **Q.**    **HAVE YOU QUANTIFIED THE DELAY THAT RESULTS FROM**  
6            **MANUAL PROCESSING?**

7    **A.**    Yes, and it is unreasonable, as explained below. While it is not  
8            possible with available data to quantify the additional error rate, any  
9            increase in errors is both undesirable and unreasonable.

10

11           BellSouth has long claimed that electronic orders that encounter either  
12            Designed Manual Fallout and or BellSouth System Errors are  
13            immediately routed to the LCSC for handling and that errors receive  
14            some sort of priority handling. In March of this year BellSouth began  
15            producing a report that clearly indicates this does not happen. This  
16            new report is known as the CLEC LSR Report. Exhibit JMB-36  
17            provides an illustrative copy of this report for one of AT&T’s Operating  
18            Company Numbers (“OCN”).

19

20           This new report makes it possible to determine the duration between  
21            the time an LSR falls out for manual processing (as a result of either a  
22            Designed Manual Fallout or a BellSouth System Error) and the time  
23            an LCSC representative “claims” that LSR to begin working on it. The

1 following table provides the average "Claim Interval" for AT&T's LSRs  
2 in May and June.

OCN	Average Claim Interval	
	May	June
7125	40 hours	40 hours
7421	29 hours	36 hours
7680	30 hours	30 hours

3  
4 I recently calculated these same intervals for the months of  
5 September and October and have summarized that data in the  
6 following table.

OCN	Average Claim Interval	
	September	October
7125	34 hours	59 hours
7421	32 hours	130 hours
7680	67 hours	74 hours

7  
8 The increase in this interval from earlier in the year, particularly during  
9 the month of October, is unreasonable. Clearly, it is unreasonable to  
10 place an electronically submitted LSR into a holding pattern for 59 to  
11 130 hours<sup>58</sup>. While such orders are waiting to be processed, other  
12 orders actually are being processed and may use resources that  
13 should have been assigned to the delayed order. Delays of this length  
14 will often result in the issuance of an order with a change in installation  
15 due date, which may not be acceptable to the customer. Other time-  
16 dependent factors associated with the order also are likely to change.

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<sup>58</sup> The earlier 29 to 40 hour interval is also unreasonable.



1           Ultimately, many orders delayed in this manner will have to be  
2           cancelled or supplemented.

3

4   **Q.   DID AT&T ATTEMPT TO DETERMINE FROM BELL SOUTH WHY**  
5   **THESE INTERVALS INCREASED SO MUCH IN OCTOBER?**

6

7   **A.**   Yes. AT&T noticed that many of its orders were not being processed  
8           in a timely fashion, and questioned BellSouth. On November 3, 2000,  
9           BellSouth responded to an AT&T October 20, 2000 e-mail, stating that  
10          there had been "a directory listings problem in our LEO systems," that  
11          "order volume had overwhelmed the center," and that 20 service  
12          representatives would be added to the staff on November 13<sup>th</sup> and 20  
13          more in December. Exhibit JMB-37. I will continue to calculate this  
14          interval and provide current data in my rebuttal testimony and at  
15          hearing. Clearly BellSouth's failure to provide flow-through ordering  
16          jeopardizes CLECs' ability to compete effectively.

17

18   **Q.   PLEASE SUMMARIZE YOUR TESTIMONY CONCERNING THE**  
19   **NEED FOR FULL ELECTRONIC ORDERING WITH FLOW**  
20   **THROUGH CAPABILITY.**

21   **A.**   BellSouth's current ordering interfaces do not provide AT&T and other  
22          CLEC's with Flow-Through Ordering capabilities equal to that enjoyed  
23          by BellSouth in its retail operations. Although BellSouth has Flow-

1 Through Ordering for all of its services, it does not provide the ability  
2 to submit local service requests electronically for all of the services  
3 and elements that AT&T wishes to purchase. Additionally, even when  
4 BellSouth makes available the ability to electronically submit a  
5 request, often it does not provide the automated capability to process  
6 the order on its side of the interface. Further, even when both the  
7 ability to submit requests electronically and an automated capability  
8 has been designed, the process often fails to perform as designed.  
9 These failures on BellSouth's part are particularly evident in the  
10 Business, UNE and LNP product groupings. Finally, BellSouth is  
11 unable to staff its LCSC in a manner that provides timely handling of  
12 the many orders that fallout of the electronic process. Thus, BellSouth  
13 not only provides discriminatory treatment of all CLEC transactions,  
14 but it also sets up additional levels of discrimination between resale,  
15 UNE and facilities-based CLECs.

16  
17 In order to eliminate this discrimination, AT&T asks this Commission  
18 to order BellSouth to provide both electronic LSR submission  
19 capability and a fully automated process for handling electronically  
20 submitted requests for all of the services and elements available to  
21 CLECs equal to that which exists for BellSouth's retail operations.  
22 BellSouth should be ordered to provide these capabilities within 12  
23 months of the Kentucky PSC's order.

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**ISSUE 24**

**THE MAINTENANCE AND REPAIR ACCESS ISSUE**

**Q. WHAT INTERFACES DOES BELLSOUTH OFFER TO AT&T FOR ACCESS TO MAINTENANCE AND REPAIR FUNCTIONS?**

**A.** BellSouth provides two options for electronic trouble reporting. For many (but not all) services associated with a telephone number, BellSouth offers access to its proprietary Trouble Analysis Facilitation Interface ("TAFI"). For both telephone number-associated exchange services and individually designed services, BellSouth provides electronic trouble reporting through an electronic communications gateway which BellSouth calls the Electronic Communication Trouble Administration ("ECTA") gateway. This interface also is referred to as the Electronic Bonding Interface ("EBI"), particularly in AT&T internal communications.

**Q. DO EITHER ECTA OR TAFI PROVIDE AT&T WITH NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OSS FOR MAINTENANCE AND REPAIR FUNCTIONS?**

**A.** No. For services associated with a telephone number, TAFI has more extensive functionality than ECTA, but TAFI is a human-to-machine interface. Consequently, when a CLEC submits a trouble report via

1 TAFI, that order must be manually entered into the CLEC's own  
2 internal OSS. ECTA, on the other hand, is a machine-to-machine  
3 interface and can be integrated with a CLEC's own OSS, but it does  
4 not have the functionality of TAFI. Thus, there is no combination of  
5 choices that provides CLECs with nondiscriminatory access to  
6 BellSouth's OSS for maintenance and repair functions. TAFI provides  
7 extensive functionality for many services associated with a telephone  
8 number, but provides no functionality for other services, and also  
9 requires costly and error-prone double entry. While ECTA can be  
10 integrated into CLEC systems, it provides only a limited set of  
11 functionality for any type of service. Obtaining and operating both  
12 interfaces simply brings the CLEC the disadvantages of both with no  
13 gain in effectiveness or efficiency and at a higher cost of operations.  
14 These choices are inconsistent with the requirements of the Act and  
15 the needs of competitors.

16

17 **Q. BELLSOUTH USES TAFI IN ITS RETAIL OPERATIONS. DOESN'T**  
18 **ALLOWING CLECS ACCESS TO TAFI PROVIDE THEM WITH THE**  
19 **SAME FUNCTIONALITY THAT BELLSOUTH ENJOYS?**

20 **A.** No. CLECs cannot integrate TAFI with their own "back office"  
21 systems as BellSouth does. When a BellSouth customer service  
22 representative creates a trouble ticket using TAFI, the system creates  
23 a record of the transaction that can be accessed and viewed from

1 BellSouth's internal systems. An CLEC customer service  
2 representative, on the other hand, must perform this process twice in  
3 order to create an internal record of any trouble transaction: once in  
4 TAFI and again within the CLEC's own system.

5

6 BellSouth itself noted its superior ability to utilize TAFI functions in its  
7 second Louisiana 271 application before the FCC. The FCC took  
8 significant notice of BellSouth's concession:

9            "We also note that BellSouth concedes that it  
10 derives superior integration capabilities from TAFI  
11 than the capabilities offered to competitors.  
12 BellSouth states that TAFI is a 'human to machine  
13 interface' meaning that new entrants using TAFI  
14 cannot integrate it with the new entrant's own  
15 back office systems....BellSouth, on the other  
16 hand, is able to take advantage of its own TAFI  
17 system's capability of 'automatically interacting  
18 with other systems as appropriate' and its  
19 customer service representatives need not  
20 duplicate their efforts in the same way. In other  
21 words, TAFI is integrated with BellSouth's other  
22 back office systems."<sup>59</sup>  
23

24 **Q. WHY IS A FULL FUNCTION MACHINE-TO-MACHINE**  
25 **MAINTENANCE AND REPAIR INTERFACE NECESSARY?**

26 **A.** If CLECs hope to compete with BellSouth, they must provide equal or  
27 better customer service and lower prices. CLECs must be able to  
28 efficiently access all of an individual customer's data on every call in  
29 order to address that customer's needs. Therefore CLECs must be

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<sup>59</sup> FCC Second Louisiana Order, ¶ 151, emphasis added.

1           able to access their own data as well as ILEC data. For example, if a  
2           CLEC wants to issue credits to a customer who had experienced  
3           recurring repairs, it would need access to billing data and  
4           maintenance histories. If the CLEC needed to determine whether a  
5           customer was being billed for specific services, it would need access  
6           to information about which services were billed and which services  
7           were provided, and also would need the ability to change the services  
8           being provided if they did not match the services billed to that  
9           customer. CLECs must be able to add or change services and adjust  
10          calling plans for customers, and require access to customer service  
11          record information to keep contact information up-to-date.

12

13          A full-function, machine-to-machine interface is essential in a  
14          competitive market. With a successful market entry, maintenance and  
15          repair volumes will increase quickly. Approximately 4% of lines will  
16          need repair treatment monthly. Customer contacts to service existing  
17          lines can be expected to occur on 6% of lines each month. Within 30  
18          months of a successful consumer market entry, a CLEC can expect  
19          one third of its total customer contacts to be for repair and  
20          maintenance.

21

22          AT&T's repair call volume 30 months after a successful market entry  
23          across the BellSouth states easily could approach 60,000 calls per

1 month. Without a full function machine-to-machine interface, an  
2 CLEC must engage in dual entry of its repair contacts, entering the  
3 contact into BellSouth's system as well as its own. Dual entry must  
4 occur while the customer is on-line for the CLEC to provide efficient  
5 customer service. Dual entry is more time consuming and results in  
6 more mistakes, requiring more service representatives. Additionally  
7 the lack of a full function machine-to-machine interface deprives the  
8 CLEC of performance information essential to the management of its  
9 service representatives. Use of an interface like TAFI that requires  
10 dual entry and is not integrated with the CLEC's own OSS means that  
11 the CLEC will not have real time access to call volume and connect  
12 time data required for efficient staffing.

13

14 **Q. HAS AT&T EVER REQUESTED THAT BELL SOUTH PROVIDE**  
15 **FULL TAFI FUNCTIONALITY OVER THE ECTA INTERFACE?**

16 **A.** Yes. Since April 1996, AT&T consistently has requested BellSouth to  
17 provide access to TAFI functionality through a machine-to-machine  
18 interface like ECTA. Exhibit JMB-38 is a copy of AT&T's Ex Parte  
19 letter to the FCC following a meeting on December 23, 1998, with  
20 members of the Common Carrier Bureau Staff, and representatives  
21 from MCI, BellSouth, and AT&T (hereinafter "AT&T 12/23/98 Ex  
22 Parte"). AT&T's initial request to BellSouth is at Tab C-4 of Exhibit

1 JMB-38. Exhibit JMB-39 visually depicts AT&T requested  
2 arrangement.

3

4 Initially, BellSouth agreed to AT&T's request. In its preliminary report  
5 to the Georgia PSC on OSS interfaces dated June 21, 1996, (page  
6 15), BellSouth stated that it "has investigated the possibility of adding  
7 to the existing [EBI] gateway a system called . . . TAFI." Exhibit JMB-  
8 38, Tab C-6. In response to BellSouth's preliminary report, the  
9 Georgia PSC ordered BellSouth to complete "the TAFI enhancements  
10 to allow full operation of the required access by March 31, 1997."<sup>60</sup>  
11 Exhibit JMB-38, Tab C-7. Despite the Georgia PSC's order, BellSouth  
12 has never provided those enhancements.

13

14 AT&T has pursued its request at every opportunity available to it since  
15 April of 1996. The chronology at Exhibit JMB-38, Tab C-1 reflects  
16 those efforts through April 3, 1998. Even though BellSouth's  
17 representatives have agreed on numerous occasions that providing  
18 TAFI functionality over the ECTA interface is possible and a goal  
19 worth pursuing (see Exhibit JMB-38, Tab C-14 for the testimony and  
20 transcript of William N. Stacy before the Georgia PSC in March 1998)  
21 no development activity ever occurred.

22

---

<sup>60</sup> Georgia PSC Order, Docket No. 6352-U (July 2, 1996).



1 The December 23, 1998, meeting which gave rise to the materials in  
2 Exhibit JMB-38, was requested by the FCC Staff after the publication  
3 of the Second Louisiana Order to increase its understanding of the  
4 need for integrateable machine-to-machine interfaces for repair and  
5 maintenance. The FCC Staff's written request for a meeting posed  
6 specific questions. AT&T's answers and supporting diagrams may be  
7 found in Exhibit JMB-38, Tab A and Tab B. During the course of this  
8 meeting, BellSouth's representative, Mr. William N. Stacy, stated that  
9 BellSouth could provide initial functionality in 13 months and complete  
10 functionality in 18 months. Over two years after this meeting,  
11 however, BellSouth still offers no TAFI functionality via the ECTA  
12 interface.

13  
14 Most recently, AT&T submitted a formal change request through the  
15 Interim Change Control Process on April 18, 2000, asking for TAFI  
16 functionality via the ECTA interface. AT&T does not believe that its  
17 recent formal request was required, however, because of BellSouth's  
18 long standing and pre-existing knowledge of the issue.

19  
20 **Q. DOES PROVIDING ADDITIONAL FUNCTIONALITY (TAFI) OVER A**  
21 **STANDARDS-BASED INTERFACE (ECTA) VIOLATE THE**  
22 **STANDARD?**

23

1    **A.**    No. Industry standards are guidelines - providing functionality over  
2           and above the guideline does not violate standards. In fact, doing so  
3           is one of the key methods by which the guidelines are expanded and  
4           improved. A number of parties using an interface based on industry  
5           standards modify the interface to provide more functionality or operate  
6           more efficiently and then submit their work and the evidence of its  
7           value to the industry for consideration as an improvement to the  
8           standard. In fact, AT&T and BellSouth have presented such joint  
9           modifications of industry standards to the industry in the past.

10

11           Further, it is important to remember that although the use of industry  
12           standards can meet the needs of a competitive local exchange  
13           market<sup>61</sup>, lack of industry standards does not excuse an incumbent  
14           LEC from meeting its obligation to provide nondiscriminatory access to  
15           OSS functions.<sup>62</sup> Similarly, deploying an interface that merely  
16           adheres to industry standards is not sufficient to demonstrate  
17           nondiscriminatory access. A BOC must provide nondiscriminatory  
18           access to its OSS functions irrespective of the existence of, or  
19           whether it complies with, industry standards.<sup>63</sup>

20

21

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<sup>61</sup> FCC Ameritech Order ¶ 217; FCC BA-NY Order ¶ 88

<sup>62</sup> FCC South Carolina Order ¶ 121, n. 362.

<sup>63</sup> FCC Louisiana II Order ¶ 137.

1 **Q. HAS BELL SOUTH TAKEN ANY ACTION TOWARD ADDRESSING**  
2 **AT&T'S CHANGE REQUEST?**

3 **A.** No. However, BellSouth announced a number of what it called  
4 "Updates to Maintenance Interfaces" to the CLEC community during  
5 the October 25, 2000 Change Control Process Monthly Status  
6 Meeting. During this meeting Mr. Gene Piatkowski discussed "DLEC  
7 TAFI", "CPSS-TS", and "E Repair". No written materials were  
8 provided to support Mr. Piatkowski's presentation.

9

10 **Q. CAN YOU BRIEFLY SUMMARIZE THE PRESENTATION?**

11 **A.** Yes. The functionality in DLEC TAFI was originally developed to  
12 support BellSouth's use of its retail ADSL product line. BellSouth now  
13 plans to make it available to CLECs and DLECs to support repair and  
14 maintenance of XDSL and line sharing for high-speed data. The retail  
15 version has apparently been internally available to BellSouth for some  
16 time but is only now being demonstrated to A/DLECs. The CLEC  
17 TAFI User Guide issued in September 2000 contains a description of  
18 DLEC TAFI in Chapter 14.

19

20 CPSS-TA (Circuit Provisioned Special Services – Trouble Analysis) is  
21 a graphical user interface (GUI) that can be used to enter designed  
22 service troubles into Work Force Administration (WFA). BellSouth  
23 apparently developed the interface based on interest from small IXCs

1 and will now offer it to CLECs as well. It was stated that CPSS-TA  
2 would be piloted with IXCs. No firm date for production availability  
3 was provided.

4  
5 E-Repair apparently is being designed initially to allow BellSouth's  
6 large retail business customers to view the status of trouble reports  
7 filed on their services. Development apparently is well along, and a  
8 pilot with large retail business customers is expected to begin in  
9 January 2001. CLECs also will be able to use this initial capability to  
10 view the status of their previously entered trouble reports (currently  
11 they must call BellSouth for status information). Mr. Piatkowski  
12 reports that E-Repair is being designed for a much broader future  
13 scope, to be implemented in stages. Phase I will provide the status-  
14 only use described above. Phase II will eventually add entry and  
15 viewing of all non-designed and designed service troubles. BellSouth  
16 stated there would likely be a migration from TAFI and CPSS-TA to E-  
17 Repair.

18

19 **Q. ARE THESE ANNOUNCEMENTS SIGNIFICANT?**

20 **A.** Although AT&T hopes that the future capabilities discussed in these  
21 announcements will become useful and meaningful improvements in  
22 the maintenance and repair functionalities available to CLECs, it is  
23 both surprising and disappointing that BellSouth elected to pursue

1           these projects without discussing them with the CLEC community that  
2           will use them. As I explained above, AT&T has a long-standing  
3           request for a full-function maintenance and repair interface, and has  
4           been negotiating in good faith with BellSouth regarding this issue for  
5           over a year, yet BellSouth failed to raise these projects as a possible  
6           solution.

7  
8           Incidentally, BellSouth has failed to comply with the requirements of its  
9           Change Control Process in announcing these interfaces. No written  
10          description of the interfaces discussed was provided to the Bellsouth  
11          Change Control Manager for distribution to the CLECs in advance of  
12          the monthly status meeting and the agenda indicated under the Open  
13          Discussion section "Updates to Maintenance Interfaces" rather than a  
14          presentation on new interfaces. Thus it was impossible for the CLECs  
15          to participate in the discussion intelligently. Further subsequent to the  
16          meeting, BellSouth has not provided any specifications associated  
17          with the new interfaces for CLEC review. An informal announcement  
18          to the Change Control Participants is not sufficient to accomplish even  
19          the limited objectives BellSouth recognizes in its language "to identify  
20          interest in the new interface and obtain input from the CLEC  
21          community" (Exhibit JMB-13, page 48), let alone meet the CLECs  
22          business needs for the timely distribution of information and  
23          specifications.

1

2 **Q. IF BELLSOUTH COMPLETES THE “DLEC TAFI”, “CPSS-TS”, AND**  
3 **“E REPAIR” PROJECTS, WILL IT HAVE FULFILLED AT&T’S**  
4 **REQUEST FOR A FULL-FUNCTION INTEGRATEABLE**  
5 **MAINTENANCE AND REPAIR INTERFACE?**

6 **A.** Without the information identified above that BellSouth has not  
7 provided, it is hard to make any firm determination. However based  
8 upon the oral presentation it seems clear that DLEC TAFI and CPSS-  
9 TA will be human to machine interfaces and that if E-Repair is to  
10 evolve to a full function integratable interface, it will not do so in the  
11 near future (before 2002). Thus, the FCC’s 1998 evaluation of  
12 BellSouth’s maintenance and repair interfaces is still relevant today.

13

14 **Q. WHAT DID THE FCC CONCLUDE REGARDING BELLSOUTH’S**  
15 **MAINTENANCE AND REPAIR INTERFACES?**

16 **A.** The FCC examined TAFI and ECTA in BellSouth’s last 271  
17 application, and concluded that neither provides competitors with OSS  
18 functionalities equivalent to BellSouth’s own capabilities.<sup>64</sup>

19

20 Regarding TAFI, the FCC concluded that TAFI does not provide  
21 nondiscriminatory access because it cannot be used for all types of  
22 orders and because TAFI is a “human to machine interface,” meaning  
23 that new entrants cannot integrate it with the new entrant’s own back

1 office systems.<sup>65</sup> The lack of integration the FCC describes requires a  
2 TAFI user to take information from the TAFI system and manually re-  
3 enter it into their own computer systems and vice versa.<sup>66</sup>

4  
5 Regarding ECTA, the FCC concluded that ECTA as provided by  
6 BellSouth does not provide parity to competitors because, as  
7 BellSouth itself pointed out, the legacy system TAFI is superior in  
8 functionality.<sup>67</sup>

9  
10 **Q. HAS BELL SOUTH IMPROVED THE FUNCTIONALITY OF TAFI**  
11 **AND ECTA IN RESPONSE TO THE FCC'S FINDINGS?**

12 **A.** No. The FCC's findings are still relevant and valid today.

13  
14 **Q. SINCE THE SECOND LOUISIANA ORDER HAS THE FCC**  
15 **ADOPTED A NEW POSITION REGARDING THE NEED FOR**  
16 **MACHINE-TO-MACHINE INTERFACES FOR MAINTENANCE AND**  
17 **REPAIR?**

18 **A.** No. In February 1999, the FCC Staff addressed the issue in a letter to  
19 BellSouth (Exhibit JMB-40, Page 2), restating the findings of the FCC  
20 in the Louisiana II Order that, "We do not here conclude that TAFI's  
21 lack of integration *per se* fails to constitute nondiscriminatory access,

---

<sup>64</sup> FCC Louisiana II Order ¶ 148.

<sup>65</sup> FCC Louisiana II Order ¶¶ 149-52.

<sup>66</sup> FCC Louisiana II Order ¶ 152.

<sup>67</sup> FCC Louisiana II Order ¶ 157.

1           although we do believe BellSouth would provide a more complete  
2           opportunity to compete if it offered competitive LECs an integrated  
3           system with the same functionalities available to BellSouth's own  
4           service representatives.”<sup>68</sup> Additionally, the Staff provided a list of  
5           information that BellSouth would be required to submit with its next  
6           application if it were to attempt to demonstrate that it was providing  
7           nondiscriminatory maintenance and repair without a machine-to-  
8           machine interface. BellSouth has not attempted to make such a  
9           demonstration in this arbitration. The Staff further indicated that it  
10          would seek additional information to assess the competitive impact  
11          resulting from the lack of a machine-to-machine interface. AT&T  
12          participated in such an information-gathering meeting with the Staff on  
13          February 17, 1999. Exhibit JMB-41 is AT&T's Ex Parte letter  
14          associated with that meeting and includes the handouts from AT&T's  
15          presentation.

16  
17          Until such time as BellSouth presents its next 271 Application to the  
18          FCC, the findings of the Louisiana II Order accurately describe the  
19          discriminatory nature of the maintenance and repair interfaces  
20          BellSouth is offering to AT&T. This Commission should order to  
21          BellSouth to provide full TAFI functionality via the ECTA interface on  
22          an expedited schedule.

---

<sup>68</sup> FCC Louisiana II Order ¶ 152.



1

2 **Q. WHAT DOES AT&T REQUEST THAT THE KENTUCKY PSC**  
3 **ORDER REGARDING THIS ISSUE?**

4 **A.** AT&T asks the Kentucky PSC to order BellSouth to provide full TAFI  
5 functionality via the ECTA interface, or another integratable machine-  
6 to-machine interface on an expedited schedule within 12 months of its  
7 Order.

8

9

**SUMMARY**

10 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

11 **A.** BellSouth must provide nondiscriminatory access to its OSS in order  
12 to comply with Section 251 of the Act and the implementing rules of  
13 the FCC. In addition to computer-based systems and databases,  
14 nondiscriminatory access to OSS includes any manual processes  
15 required in conjunction with or in the absence of such systems and  
16 capabilities.

17

18 BellSouth has not offered a resolution to the Footprint-OS/DA Issue,  
19 the Equivalent Functionalities Issue or the Maintenance and Repair  
20 Access Issue that would provide AT&T with the same functionalities  
21 that BellSouth provides itself through its various OSS. BellSouth thus  
22 has been unwilling to provide AT&T with nondiscriminatory access.  
23 Likewise, BellSouth's offered Change Control Process is insufficient

1 under the Act and current FCC guidance. BellSouth does not provide  
2 customized routing through a commercially viable, timely, repeatable  
3 process and thus is not entitled to charge for OS/DA using market-  
4 based rates.

5

6 BellSouth's ordering/provisioning interfaces do not provide AT&T with  
7 sufficient functionality. AT&T cannot submit flow-through electronic  
8 orders for the arrangements necessary to route a specific customer's  
9 operator services or directory assistance calls to either BellSouth's  
10 service platform on an unbranded basis or to another service platform  
11 of AT&T's choosing.

12

13 BellSouth fails to provide a key pre-ordering element, the Customer's  
14 Service Record electronically in a parsed manner suitable for  
15 automated integration into AT&T's OSS, which would allow for  
16 automated error-free population of many required fields of a Local  
17 Service Request.

18

19 AT&T cannot electronically order the same range of retail services as  
20 BellSouth and can electronically order only a handful of network  
21 elements. Further, for a significant portion of electronically submitted  
22 orders, BellSouth subsequently performs manual processing of  
23 AT&T's orders that is not required to process BellSouth's orders for

1 the same services and elements. BellSouth's excessive reliance upon  
2 manual ordering and provisioning processes significantly  
3 disadvantages AT&T in its attempt to enter the local market using  
4 either network elements or its own facilities.

5

6 BellSouth's maintenance and repair interfaces (EBI/ECTA and TAFI)  
7 do not provide AT&T with nondiscriminatory access. EBI/ECTA is a  
8 machine-to-machine interface that lacks the requisite functionality.  
9 TAFI, on the other hand, has adequate functionality but is a human-to-  
10 machine interface. AT&T has requested that BellSouth provide  
11 access to TAFI functionality through EBI/ECTA, which should provide  
12 better access to BellSouth's OSS for maintenance and repair  
13 functions. BellSouth has agreed that such access is technically  
14 feasible but has not committed to an implementation date.

15

16 Finally, the Kentucky PSC should order BellSouth to provide a  
17 comprehensive Change Control Process, with "cradle to grave"  
18 coverage of the life cycle of an interface or process (electronic or  
19 manual) and its supporting documentation (such as specifications,  
20 business rules, methods, and procedures). The evolving CCP is  
21 lacking in coverage of many critical areas.

22

1 For these reasons and the reasons explained above, I recommend  
2 this Commission find that BellSouth's OSS interfaces offered through  
3 negotiation do not comply with the provisions of Section 251 of the Act  
4 and recommend that this Commission adopt AT&T's proposed  
5 Interconnection Agreement language for issues 18, 19, 22, 23 and 24.  
6

7 **Q. DOES THAT COMPLETE YOUR TESTIMONY AT THIS TIME?**

8 **A.** Yes.

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