

1 Bellsouth Telecommunications, Inc.
2 Direct Testimony of Ronald M. Pate
3 Before the Kentucky Public Service Commission
4 Case No. 2000-465
5 February 6, 2001
6

7 Q. Please state your name, your position with Bellsouth
8 Telecommunications, Inc. and your business address.

9
10 A. My name is Ronald M. Pate. I am employed by BellSouth
11 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
12 Services. In this position, I handle certain issues related to local
13 interconnection matters, primarily operations support systems ("OSS").
14 My business address is 675 West Peachtree Street, Atlanta, Georgia
15 30375.

16
17 Q. Please summarize your background and experience.

18
19 A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in
20 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of
21 Business Administration from Georgia State University. My professional
22 career spans over twenty-five years of general management experience in
23 operations, logistics management, human resources, sales and marketing.
24

1 I joined BellSouth in 1987, and have held various positions of increasing
2 responsibility since that time.

3

4 Q. HAVE YOU TESTIFIED PREVIOUSLY?

5

6 A. Yes. I have testified before the Public Service Commissions in Alabama,
7 Florida, Georgia, Louisiana, South Carolina, Kentucky, the Tennessee
8 Regulatory Authority and the North Carolina Utilities Commission.

9

10 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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12 A The purpose of my testimony is to provide BellSouth's position on OSS-
13 related Issue Nos. 19, 22, 23 and 24 raised by AT&T Communications of
14 the South Central States, Inc. ("AT&T") and TCG Ohio ("TCG")
15 (collectively, "AT&T") in their Petition for Arbitration filed with the Kentucky
16 Public Service Commission ("Commission") on October 20, 2000.

17

18 Q. DO YOU HAVE PRELIMINARY COMMENTS BEFORE YOU RESPOND
19 TO THE ISSUES RAISED IN AT&T'S PETITION?

20

21 A. Yes. The issues I address deal with BellSouth's Operations Support
22 Systems – what I generally refer to as OSS in this testimony. I believe
23 that it will be easier for the Commission to place these issues in context if I
24 begin with a discussion of what the Federal Communications Commission
25 ("FCC") requires, particularly with regard to access to BellSouth's OSS,

1 the types of OSS that will be available and their functionality. After I
2 conclude that discussion, I will turn to the specific issues in this
3 proceeding.

4
5 Q. DID THE FCC DEFINE NONDISCRIMINATORY ACCESS TO
6 OPERATIONS SUPPORT SYSTEMS?

7
8 A. Yes. The FCC's August 8, 1996 Order in Docket No. 96-98 ("FCC August
9 8 Order"), at paragraph 312, indicates generally that the quality of access
10 to unbundled network elements must be comparable among and between
11 Competitive Local Exchange Carriers ("CLEC"), and BellSouth. More
12 specifically, paragraph 518 of the FCC's August 8 Order states that "if
13 competing carriers are unable to perform the functions of pre-ordering,
14 ordering, provisioning, maintenance and repair, and billing for network
15 elements and resale services in substantially the same time and manner
16 that an incumbent can for itself, competing carriers will be severely
17 disadvantaged, if not precluded altogether, from fairly competing. Thus
18 providing nondiscriminatory access to these support system functions,
19 which would include access to the information such systems contain, is
20 vital to creating opportunities for meaningful competition."

21
22 Q. HAS THE FCC SUBSEQUENTLY REAFFIRMED THIS DEFINITION?

23
24 A. Yes. In paragraph 87 of its Order on BellSouth's second 271 application
25 for Louisiana, the FCC reiterated its requirement that a BOC must offer

1 access to competing carriers that is analogous to OSS functions that a
2 BOC provides to itself. "Access to OSS functions must be offered such
3 that competing carriers are able to perform OSS functions in 'substantially
4 the same time and manner' as the BOC. For those OSS functions that
5 have no retail analogue . . . a BOC must offer access sufficient to allow an
6 efficient competitor a meaningful opportunity to compete."
7

8 Q. DOES BELLSOUTH PROVIDE CLECS NONDISCRIMINATORY
9 ACCESS TO ITS OSS?
10

11 A. Yes. BellSouth provides CLECs nondiscriminatory access to its OSS
12 functions for pre-ordering, ordering, provisioning, maintenance and repair,
13 and billing through robust and reliable manual and electronic interfaces.
14 The electronic interfaces are LENS, TAG, RoboTAG™, EDI, TAFI, ECTA
15 (EC-CPM), ADUF, ODUF and EODUF. The acronyms for these interfaces
16 will be discussed shortly and a glossary of these and other terms is
17 provided as Exhibit RMP-1. As a final comment, BellSouth's OSS
18 interfaces for CLECs are operated and available on a regional basis and
19 so the same access is available everywhere, not just in Kentucky.
20

21 Q. HOW DOES A CLEC DETERMINE WHICH INTERFACES TO USE?
22

23 A. A CLEC's selection of an interface depends on its business plan and entry
24 strategy. BellSouth has designed and implemented a variety of electronic
25 interfaces to suit the varied business plans and entry methods of the

1 CLECs in BellSouth's region. CLECs can select from among the
 2 interfaces described below to match their particular mix of services,
 3 volume of orders, technical expertise, resources, and future plans. The
 4 following chart depicts the entry methods and the nondiscriminatory
 5 interfaces from which a CLEC may choose.

6

	Resale	UNEs	Facility-Based
Pre-Ordering	TAG	TAG	TAG
	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™
Ordering & Provisioning	EDI	EDI	EDI
	TAG	TAG	TAG
	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™
Maintenance & Repair	TAFI	TAFI (Tel. # - based)	ECTA
	ECTA	ECTA	EC-CPM
Billing	EODUF	ADUF	N/A
	ODUF	EODUF	
		ODUF	

7

1 Q. PLEASE DESCRIBE THE INTERFACES THAT BELLSOUTH USES TO
2 ACCESS ITS OSS FOR ITS RETAIL CUSTOMERS.

3

4 A. For its retail basic exchange service customers, BellSouth uses two retail
5 marketing and sales support systems to access pre-ordering, ordering,
6 and provisioning information from BellSouth's downstream OSS.
7 BellSouth uses the Regional Negotiation System ("RNS") for most types of
8 residential service requests. For business customers, BellSouth uses the
9 Regional Ordering System ("ROS").

10

11 Q. CAN YOU DESCRIBE GENERALLY THE TYPES OF INTERFACES
12 THAT BELLSOUTH OFFERS TO CLECS THAT ALLOW THEM TO HAVE
13 THE SAME PRE-ORDERING AND ORDERING FUNCTION THAT
14 BELLSOUTH HAS?

15

16 A. BellSouth offers a number of interfaces from which the CLECs can
17 choose. Some are machine-to-machine interfaces and others are human-
18 to-machine interfaces. We offer both kinds because there are a
19 tremendous number of CLECs out there and the "one size fits all"
20 mentality just won't allow everyone to participate in the manner that they
21 want to. I do want to emphasize, however, that BellSouth simply makes
22 the alternatives available. We do not attempt to dictate which of the
23 interfaces any particular CLEC will utilize.

24

1 Q. CAN YOU EXPLAIN WHAT YOU MEAN BY “MACHINE-TO-MACHINE”
2 VS. “HUMAN-TO-MACHINE”?

3

4 A. Yes. Let’s illustrate the difference by looking at the maintenance and
5 repair interfaces. BellSouth's Trouble Analysis and Facilitation Interface
6 (“TAFI”) is a human-to-machine interface, and the Electronic
7 Communications Trouble Administration (“ECTA”) Gateway is a machine-
8 to-machine interface. With TAFI, a CLEC’s service representative has
9 direct access to the BellSouth systems used for trouble reporting and
10 tracking. That is, the CLEC representative sees exactly what a BellSouth
11 service representative sees, and interacts directly with BellSouth's OSS.
12 With ECTA – a machine-to-machine interface – the service representative
13 interacts with the CLEC’s own computer software, and that computer
14 software then interacts with the BellSouth OSS.

15

16 Q. LETS BEGIN WITH THE MACHINE-TO-MACHINE PRE-ORDERING
17 AND ORDERING FUNCTIONS. CAN YOU DESCRIBE WHAT IS
18 AVAILABLE FOR THE CLECS?

19

20 A. Yes. BellSouth provides CLECs with a machine-to-machine industry
21 standard Telecommunications Access Gateway (“TAG”) pre-ordering,
22 ordering and provisioning interface. The TAG pre-ordering and ordering
23 interfaces provide access to the same pre-ordering, ordering, and
24 provisioning OSS functions accessed by the BellSouth retail systems,
25 RNS and ROS. TAG, which was developed in response to specific

1 requests from mid-sized and large CLECs and in response to the Georgia
2 PSC's Docket No. 8354-U, provides a standard Application Programming
3 Interface ("API") to BellSouth's pre-ordering and ordering OSS. TAG is
4 based on Common Object Request Broker Architecture ("CORBA"), which
5 is the industry standard for pre-ordering. The TAG pre-ordering interface
6 has been available since August 31, 1998. TAG follows the industry
7 standard Ordering and Billing Forum ("OBF") guidelines for Local Service
8 Requests ("LSRs"). The TAG ordering interface has been available since
9 November 1, 1998.

10

11 Q. IS THERE ANOTHER MACHINE-TO-MACHINE ELECTRONIC
12 ORDERING AND PROVISIONING INTERFACE THAT BELLSOUTH
13 PROVIDES TO CLECS?

14

15 A. Yes. BellSouth also provides CLECs with the machine-to-machine
16 Electronic Data Interchange ("EDI") ordering interface. EDI allows CLECS
17 to access the same ordering and provisioning OSS functions accessed by
18 RNS and ROS for BellSouth. EDI follows the industry standard protocol
19 (EDI) for ordering and the industry standard OBF guidelines for LSRs.
20 EDI has been available to any interested CLEC since December 1996.

21

22 Q. CAN A CLEC INTEGRATE ITS OWN INTERNAL OSS WITH
23 BELLSOUTH'S TAG AND EDI INTERFACES?

24

1 A. Yes. In accordance with the FCC's requirements, BellSouth provides
2 CLECs with all the specifications necessary for integrating the BellSouth
3 interfaces. A CLEC may integrate ordering and pre-ordering functions by
4 integrating the TAG pre-ordering interface with the EDI ordering interface,
5 or by integrating TAG pre-ordering with TAG ordering. CLECs interested
6 in integrating the pre-ordering and ordering systems with their own internal
7 systems must, of course, have their own internal OSS, and have
8 responsibility for that integration. By requiring BellSouth to provide "the
9 specifications necessary to instruct competing carriers on how to modify or
10 design their systems in a manner that will enable them to communicate
11 with the BOC's legacy systems and any interfaces utilized by the BOC for
12 such access," it is clear that the FCC intended that the CLECs, not
13 BellSouth, would perform the necessary integration. Ameritech Michigan
14 Order, paragraph 137.

15

16 Q. WHAT ARE THE ADVANTAGES OF THIS KIND OF INTEGRATION?

17

18 A. The interfaces BellSouth makes available for CLECs provide
19 nondiscriminatory access to the pre-ordering, ordering, and provisioning
20 information and functions in BellSouth's OSS, while also allowing the
21 CLECs to develop their own customer service systems, including their
22 own pricing, packaging, sales, and customer account recommendations.
23 By using the integratable interfaces, CLECs can customize their own
24 marketing and sales support systems to perform functions such as
25 automatic telephone number selection, preferred and local interexchange

1 carrier (PIC/LPIC) searches, and credit checks (after contracting with a
2 third-party credit reporting agency). Integratable interfaces allow CLECs
3 to design the appearance and "feel" of their marketing and sales support
4 systems as they see fit; this is one of the advantages of integration and
5 machine-to-machine interfaces. Because these CLECs' marketing and
6 sales support systems integrate the electronic interfaces with the CLECs'
7 own internal OSS, CLECs can use information obtained via the electronic
8 interfaces to build their own databases, such as databases of their own
9 local customer service records.

10

11 Q. ARE THERE OTHER CHOICES AVAILABLE FOR CLECS THAT DO
12 NOT WANT TO USE THESE INTEGRATABLE MACHINE-TO-MACHINE
13 ELECTRONIC INTERFACES?

14

15 A. Yes. Because BellSouth recognizes that there are CLECs that have
16 decided not to use integratable machine-to-machine interfaces, BellSouth
17 offers CLECs a variety of other interfaces to suit their needs and business
18 plans for preordering, ordering and provisioning.

19

20 For CLECs that wish to use TAG for pre-ordering, ordering, and
21 provisioning in conjunction with their own databases, but have made the
22 business decision not to hire programmers to develop and maintain their
23 own TAG interface, BellSouth sells an interface called "RoboTAG™." This
24 interface was developed by Science Applications International Corporation
25 (SAIC), under contract with BellSouth. RoboTAG™ is a standardized,

1 browser-based interface to the TAG gateway that resides on a CLEC's
2 LAN server, and provides integrated pre-ordering and ordering with up-
3 front editing. BellSouth first made RoboTAG™ available in November
4 1999. The first CLEC that purchased RoboTAG™ completed testing and
5 was ready for production on November 24, 1999.

6

7 Q. DOES BELLSOUTH OFFER A HUMAN-TO-MACHINE INTERFACE
8 THAT OFFERS PRE-ORDERING, ORDERING, AND PROVISIONING?

9

10 A. Yes. For CLECs that have made the business decision not to integrate
11 pre-ordering, ordering and provisioning interfaces with their own internal
12 OSS, and do not want to expend the resources necessary to use
13 RoboTAG™, BellSouth makes available the human-to-machine Local
14 Exchange Navigation System ("LENS") interface. LENS is a web-based
15 graphical user interface ("GUI"). The LENS GUI requires software
16 development only on BellSouth's side of the interface. With the release of
17 version 6.0 of LENS on January 14, 2000, LENS became a GUI to the
18 TAG gateway. LENS now uses TAG's architecture and gateway, and
19 therefore has TAG's pre-ordering functionality for resale services and
20 UNEs, and TAG's ordering functionality for resale services. While LENS is
21 not integratable with a CLEC's internal OSS, LENS does provide
22 integrated pre-ordering and ordering in its firm order mode. In order to
23 use LENS, a CLEC must have, at a minimum, a personal computer, web
24 browser software, and an internet connection to use LENS (of course, the

1 CLEC must also test with BellSouth, attend training, and obtain a
2 password). LENS has been available since April 1997.

3

4 Q ONCE AN ORDER IS PLACED, DOES BELLSOUTH HAVE AN
5 INTERFACE AVAILABLE TO CLECS THAT ALLOWS THEM TO CHECK
6 THE STATUS OF THE ORDER?

7

8 A. Yes. The CLEC can use the CLEC Service Order Tracking System
9 (“CSOTS”), which became available in December 1999. This web-based
10 electronic interface allows CLECs to view service orders on-line, track
11 service orders, and to determine the status of their service orders.
12 Specifically, CLECs can view their orders as they appear in BellSouth's
13 Service Order Communication System (“SOCS”), and obtain other useful
14 provisioning and status information, such as jeopardy statuses, pending
15 facilities (PFs), and missed appointments (MAs). CSOTS provides CLECs
16 with a “view” that shows service orders by order status and by state.
17 CSOTS also allows CLECs to search for information using a variety of
18 criteria, including a range of due dates; the current due date; the
19 telephone account number; the service order number; and the purchase
20 order number (“PON”). CLECs can sort this information by PON, by NPA
21 NXX, by status type, by the number of days orders have been in a
22 particular status, by listed name, by service order number, by current due
23 date, and by application date. CSOTS offers CLECs the option of viewing
24 and/or downloading provisioning information using Microsoft’s Excel™
25 spreadsheet program.

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Q. TURNING NOW TO THE OTHER FUNCTIONS THAT BELLSOUTH MUST MAKE AVAILABLE TO CLECS, CAN YOU DESCRIBE WHAT MAINTENANCE AND REPAIR INTERFACES BELLSOUTH USES FOR ITS RETAIL CUSTOMERS?

A. Yes. I have already mentioned this briefly. For BellSouth's retail customers with Plain Old Telephone Service ("POTS"), BellSouth's business and residence repair center attendants use either a business or residence version of the human-to-machine Trouble Analysis and Facilitation Interface ("TAFI"). For non-POTS services, BellSouth uses the human-to-machine WFA-C interface.

Q. WHAT INTERFACES DOES BELLSOUTH OFFER CLECS FOR MAINTENANCE AND REPAIR?

A. BellSouth offers TAFI to CLECs. The TAFI system for CLECs combines the complete functionality of the separate business and residence versions of TAFI used by BellSouth's repair attendants.

Q. TAFI IS A HUMAN-TO-MACHINE INTERFACE WHETHER USED BY BELLSOUTH OR A CLEC. DOES BELLSOUTH PROVIDE CLECS WITH A MACHINE-TO-MACHINE TROUBLE REPORTING INTERFACE IN ADDITION TO THE TAFI INTERFACE?

1 A. Yes. Again, as I have mentioned, BellSouth also offers CLECs the
2 machine-to-machine Electronic Communications Trouble Administration
3 (“ECTA”) Gateway, which conforms to the T1/M1 standard for local
4 exchange trouble reporting and notification. I should note, to be
5 complete, that BellSouth also offers the human-to-machine EC-CPM
6 interface, which provide access to BellSouth's OSS for POTS and non-
7 POTS services and UNEs.

8

9 Q. CAN YOU TELL US THE DIFFERENCE BETWEEN TAFI AND ECTA?

10

11 A. I will explain the difference in detail later in my testimony, but basically,
12 TAFI allows the BellSouth or CLEC representative to input a trouble and
13 get feedback, often while the end-user customer is still on the line. The
14 ability to get feedback right away is not available in ECTA. However,
15 ECTA can be integrated with the CLEC's internal OSS and databases,
16 whereas TAFI cannot.

17

18

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

22

23 Q. WHAT IS BELL SOUTH'S UNDERSTANDING OF THIS ISSUE?

24

1 A. Based on the information in AT&T's matrix, the information contained in
2 proposed interconnection agreement language submitted with its petition
3 and the negotiations that have occurred between the two parties,
4 BellSouth understands that this issue deals with the way that AT&T will
5 order Operator Service/Directory Assistance ("OS/DA") for its subscribers.
6 AT&T wants the ability to submit two types of orders; 1) an infrastructure
7 provisioning or "footprint" order to establish a specific single, or "default",
8 OS/DA routing plan and 2) individual LSRs for specific AT&T end user
9 customers.

10

11 Q. CAN YOU ELABORATE ON WHAT AT&T WANTS WITH REGARD TO
12 THIS ISSUE?

13

14 A. It is my understanding that, with regard to the "footprint order", AT&T is
15 requesting a mutually agreed upon documented process that BellSouth
16 and AT&T will follow to implement AT&T's request to have its customers'
17 calls routed to a BellSouth OS/DA platform, but to have the call
18 unbranded. This issue is discussed in more detail in Mr. Milner's
19 testimony, but assuming that what AT&T is requesting is a "default"
20 routing, BellSouth can provide that electronically.

21

22 Q. HAS BELLSOUTH PROVIDED AT&T WITH PROCEDURES TO
23 ESTABLISH THE "FOOTPRINT ORDER"?

24

1 A. Yes. BellSouth has provided information to allow AT&T to adopt any one
2 of three “default” routings for its OS/DA calls. Procedures to establish the
3 “footprint order” were first provided in the proposed contractual language
4 for AT&T’s interconnection agreement. In August of 2000, BellSouth
5 provided AT&T “footprint order” proposed contractual language for the
6 OS/DA unbranded routing option. On October 23, 2000, BellSouth
7 provided additional proposed contractual language for a custom branded
8 option. On October 26, 2000, BellSouth provided additional proposed
9 contractual language for a third party platform routing option. Each
10 document provides the process for establishing the “footprint order” for
11 that particular option, and these three proposed contractual language
12 documents are provided together as Exhibit RMP-2.

13

14 BellSouth delivered the user requirements for the unbranded OS/DA
15 option to AT&T on November 13, 2000. The current version 4.0 of the
16 user requirements for this feature is attached as Exhibit RMP-3. The
17 document’s Change History log (pg. 4) outlines the development of these
18 procedures.

19

20 Q. DOES AN INDUSTRY STANDARD EXIST THAT CAN BE USED TO
21 ACCOMPLISH WHAT AT&T IS ASKING FOR?

22

23 A. No. An industry standard has not been approved by the Ordering and
24 Billing Forum (“OBF”), a subcommittee of the Alliance for
25 Telecommunications Solutions (“ATIS”), governing the location of a

1 customized branded or unbranded routing code on an electronic order. As
2 clarification, ATIS is the primary body addressing industry standards and
3 guidelines in these areas.

4
5 However, BellSouth is willing to provide AT&T with the capability of
6 submitting individual customer LSRs electronically. Furthermore, as the
7 result of AT&T's request for an OS/DA unbranded routing option, and
8 subsequent negotiations between the two parties, BellSouth has
9 developed the electronic ordering capability to automatically identify and
10 generate specified Line Class Codes ("LCC") on behalf of AT&T when
11 AT&T selects the OS/DA unbranded option. BellSouth implemented this
12 feature in Release 8.0 on November 18, 2000.

13

14 Q. WHEN RELEASE 8.0 WAS IMPLEMENTED, DID AT&T HAVE THE
15 ABILITY TO IMMEDIATELY ISSUE LSRS FOR LINES WITH THE
16 UNBRANDED OS/DA ROUTING OPTION?

17

18 A. Unfortunately, not immediately. In addition to the Release 8.0
19 programming work for the service request flow process, it was necessary
20 to program the appropriate central office switch with proper routing
21 instructions. While the programming for the central office was done
22 correctly, the part of the programming for Release 8.0 that was associated
23 with the Local Exchange Service Order Generator ("LESOG") was done
24 incorrectly, and the OS/DA routing did not operate as intended until the
25 programming was done correctly. While that is regrettable, and BellSouth

1 would have certainly preferred that it had not happened, there are
2 sometimes problems when central office programming is changed –
3 specifically due to human error in this situation. This was the first time that
4 BellSouth tried to implement the OS/DA program, and we had a problem.
5 That problem has since been corrected, and the unbranded OS/DA option
6 is available to AT&T for their project.

7

8 Q. WHAT ADDITIONAL LSR ENTRIES ARE REQUIRED OF AT&T TO
9 SUBMIT LSRS FOR UNBRANDED OS/DA?

10

11 A. AT&T will submit LSRS for unbranded OS/DA in accordance with standard
12 BellSouth business rules for ordering port/loop combinations. No special
13 or additional entries are required.

14

15 Q. CAN OTHER CLECS ORDER THE SAME CAPABILITY FROM
16 BELL SOUTH?

17

18 A. Absolutely. On November 22, 2000, Carrier Notification SN91082004
19 (provided as Exhibit RMP-4) was posted to the BellSouth Interconnection
20 Services web site announcing the availability of the feature, with
21 instructions for interested CLECs to contact their account team
22 representatives for information – the same process AT&T went through.
23 The core documentation for the general CLEC community is the same as
24 that for the AT&T documentation (Exhibit RMP-3), but the requirements
25 will be specific to the CLEC electing to use the service.

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Q. PLEASE SUMMARIZE YOUR TESTIMONY ON ISSUE 19.

A. BellSouth has responded to AT&T's request to provide the unbranded OS/DA option as specified for its project, and has provided all of the necessary procedures to order any of the multiple options for OS/DA. The fact that BellSouth had a problem at initial installation does not mean that we have not tried to accommodate AT&T's request, and AT&T is well aware of efforts in that regard. Furthermore, BellSouth has made the OS/DA option available to all CLECs, and has provided the instructions for implementing the service, i.e., contact the account team and BellSouth will take care of the rest. Frankly, given all of these circumstances, coupled with an unwillingness on AT&T's part to provide a forecast indicating its intent to truly use this service, it is not at all clear what AT&T wants this Commission to do with regard to this issue.

- Issue 22: Should the Change Control Process be sufficiently comprehensive to ensure that there are processes to handle at a minimum the following situations:***
- a) introduction of new interfaces;***
 - b) retirement of existing interfaces;***
 - c) exceptions to the process;***
 - d) documentation, including training;***
 - e) defect correction;***

- 1 **f) *emergency changes (defect correction);***
- 2 **g) *an eight-step cycle, repeated monthly;***
- 3 **h) *a firm schedule for notifications associated with changes initiated by***
- 4 ***BellSouth;***
- 5 **i) *a process for dispute resolution including referral to state utility***
- 6 ***commissions or courts;***
- 7 **j) *a process for escalation of changes in process;***
- 8 **k) *testing support and a testing environment;***
- 9 **l) *provision for a trouble number for Type-1 events;***
- 10 **m) *a process for the cancellation, rejection or reclassification of CLEC***
- 11 ***change requests;***
- 12 **n) *a process for prioritization and assignment of change requests to***
- 13 ***future releases for implementation;***
- 14 **o) *a process for changing the process.***

15

16 Q. WHAT IS THE CHANGE CONTROL PROCESS?

17

18 A. As the Commission knows, the CLECs are entitled to have access to the
19 OSSs utilized by BellSouth to provide service to its customers. To
20 facilitate this access, the interfaces that I have previously mentioned,
21 TAG, EDI, LENS and so forth, have been developed. Obviously changes
22 in these interfaces are of importance to both BellSouth and the CLECs.
23 The Change Control Process (“CCP”) is the process by which BellSouth
24 and the CLECs manage requested changes to the CLEC interfaces, the
25 introduction of new interfaces, and provide for the identification and

1 resolution of issues related to change requests. This process covers
2 change requests that affect external users of BellSouth's electronic
3 interfaces, associated manual process improvements, performance or
4 ability to provide service including defect notification. Associated
5 documentation is included in this process.

6
7 The Change Control Process itself is documented in a publication that is
8 now in version 2.0, and that is attached to my testimony as Exhibit RMP-5.
9 As I will discuss later in this testimony, a number of changes to the
10 existing CCP document have been accepted by the CCP, and will be
11 incorporated into a new version of the CCP document that will be posted
12 on the BellSouth CCP website on or about February 9.

13

14 Q. IN ITS RECENT ORDER APPROVING BELL ATLANTIC'S NEW YORK
15 APPLICATION FOR LONG DISTANCE, HOW DID THE FCC DESCRIBE
16 "CHANGE MANAGEMENT"?

17

18 A. The FCC stated, "The change management process refers to the methods
19 and procedures that the BOC employs to communicate with competing
20 carriers regarding the performance of and changes in the BOC's OSS
21 system. Such changes may include operations updates to existing
22 functions that impact competing carrier interface(s) upon a BOC's release
23 of new interface software; technology changes that require competing
24 carriers to meet new technical requirements upon a BOC's software
25 release date; additional functionality changes that may be used at the

1 competing carrier's option, on or after a BOC's release date for new
2 interface software; and changes that may be mandated by regulatory
3 authorities." [Emphasis added.] Bell Atlantic New York Order, ¶103Q.
4

5 Q. DOES BELLSOUTH HAVE A GENERAL POSITION ON THE INCLUSION
6 OF THIS ISSUE IN THIS ARBITRATION?
7

8 A. Yes. BellSouth's position is that the content of the CCP is not an
9 appropriate issue for arbitration with an individual CLEC. The CCP was
10 established through collaboration between interested CLECs, including
11 AT&T, and BellSouth. The changes submitted through this process are
12 handled collaboratively by the participating CLECs and BellSouth. By
13 proposing to arbitrate this issue, AT&T is effectively attempting an end-run
14 around the CCP and effectively excluding other CLECs that have a very
15 real interest in how the change control process works. Allowing AT&T to
16 succeed in this end-run would result in AT&T's gaining an unfair
17 advantage over the parties that adhere to the process. Like the interfaces
18 themselves, the change control process is regional. Issues submitted to
19 the CCP must be dealt with by BellSouth and all of the membership of
20 approximately one hundred (100) CLECs (as of December 31, 2000)
21 participating in CCP – not just BellSouth and AT&T. Indeed, the best
22 proof of the correctness of this conclusion is illustrated by something I
23 mentioned earlier. We are currently operating under Version 2 of the
24 CCP. There have previously been Versions 1.4, 1.6 and 1.7. On or about
25 February 9, 2001, after this testimony is filed, there will be a new version

1 introduced, which will be different than the version under which we are
2 currently operating. It is just wrong to try to arbitrate the CCP process in a
3 proceeding that involves such a dynamic document, particularly when
4 there are only two parties to the arbitration.
5

6 Q. IN ITS PROPOSED RECOMMENDED ARBITRATION ORDER BEFORE
7 THE NORTH CAROLINA UTILITIES COMMISSION (DOCKET NO. P-
8 140, SUB 73 & P-646, SUB 7), WHAT IS THE RECOMMENDATION OF
9 THAT COMMISSION'S STAFF RELATED TO ARBITRATION OF THE
10 CHANGE MANAGEMENT ISSUE?
11

12 A. On page 16 of its proposed recommended order, the North Carolina
13 Utilities Commission Staff states that "this arbitration docket is an
14 inappropriate forum for consideration of wholesale modifications to the
15 CCP or the CCP document, as proposed by AT&T. . . . The CCP, an open
16 forum of industry technical experts, should bear the primary responsibility
17 of debating the merits of AT&T's proposed changes in OSS and working
18 toward solutions and compromises that are acceptable to AT&T,
19 BellSouth, and the industry as a whole." On page 17 of its proposed
20 recommended order, the Staff further recommends that "the Commission
21 also concludes that it should not mandate changes to the CCP or interim
22 CCP document in this arbitration docket without all of the interested CLPs
23 [Competing Local Providers] having ample opportunity to participate in
24 these discussions".
25

1 Q. IF THIS COMMISSION SHOULD DETERMINE THAT A SEPARATE CCP
2 IS REQUIRED FOR KENTUCKY, HOW WOULD THIS DECISION
3 AFFECT THE CCP?

4
5 A. This is of major concern to BellSouth. The manual processes and
6 electronic interfaces implemented for the CLECs by BellSouth are regional
7 systems. And as I stated previously, the CCP is a regional, collaborative
8 process between BellSouth and the participating CLECs.

9
10 Since this issue is being arbitrated between BellSouth and AT&T in at
11 least six states, conceivably BellSouth could be required to implement
12 separate change control processes for three, four, or even all six states.
13 This would destroy the regional and collaborative nature of the CCP. The
14 decisions affecting the CCP are better left with the industry itself, the
15 participating CLECs and BellSouth. If the Commission does determine to
16 hear this issue, BellSouth respectfully submits that the Commission should
17 only give guidance on these issues, rather than order specific changes in
18 order to avoid the state-to-state conflicts I mentioned.

19
20 Q. IF THE COMMISSION SHOULD DETERMINE THAT IT WILL ALLOW
21 ARBITRATION OF THIS ISSUE, HOW IS YOUR TESTIMONY
22 ORGANIZED TO PRESENT BELL SOUTH'S POSITION ON THE
23 INDIVIDUAL SUB-ISSUES RAISED BY THIS DISPUTE?

24

1 A. Although BellSouth believes that this entire issue is inappropriate for
2 arbitration, BellSouth will address the issue as described by AT&T's
3 issues matrix. First, I will provide background on the change management
4 process. Then I will provide BellSouth's individual responses to items (a)
5 through (o) raised in Issue 22.

6

7 Q. HOW WAS THE CCP DEVELOPED?

8

9 A. BellSouth established its original change management process, known as
10 the Electronic Interface Change Control Process ("EICCP"), to secure
11 input from the CLECs regarding future enhancements to existing
12 electronic CLEC interfaces, and to have an organized means of securing,
13 understanding and prioritizing the CLECs' requirements regarding these
14 interfaces. From the beginning of the EICCP's development, BellSouth
15 sought the participation of the CLECs, including AT&T. Discussions
16 began in October 1997 and AT&T was a member of the committee that
17 developed the process.

18

19 The Georgia Public Service Commission Staff ("Staff") conducted a
20 Technical Workshop with BellSouth and the interested CLECs on
21 December 9-10, 1997 at which the change management process was
22 discussed. In its Recommendation issued on December 12, 1997, as a
23 result of the workshop, the Staff recommended a change control process
24 for electronic interfaces. The GA PSC issued its order approving the staff

1 recommendation on April 21, 1998. On May 15, 1998, the EICCP became
2 effective and operational throughout BellSouth's region.

3

4 Q. WHAT CATEGORIES DID THE ORIGINAL EICCP ENCOMPASS?

5

6 A. The original EICCP handled the following categories of changes: software,
7 hardware, industry standards, products and services, new or revised edits,
8 process, regulatory, and documentation.

9

10 Q. HAS THE ORIGINAL PROCESS BEEN ENHANCED?

11

12 A. Yes. BellSouth and the CLECs jointly determined and agreed that the
13 original EICCP needed to be enhanced. Thus, a workshop on this subject
14 was held on February 16-17, 2000, and all participating CLECs were
15 invited. This was done so that all of the CLECs – not just one or two of
16 them – could propose changes to the plan. AT&T was the driving force
17 behind the majority of the changes proposed during the workshop.
18 Following the workshop, a draft revised Change Control Process
19 document ("CCP document") was distributed to the CLECs.

20

21 BellSouth conducted conference calls on February 29, 2000, March 23,
22 2000 and every month thereafter – again, with all participating CLECs
23 invited – to review the recommended CCP changes raised during the
24 workshop and to follow-up on any outstanding issues. Exhibit RMP-6

1 provides a copy of the February 29, 2000 Steering Committee Meeting
2 minutes.

3

4 Q. PLEASE EXPLAIN HOW THE CHANGE MANAGEMENT PROCESS
5 WAS EXPANDED AS A RESULT OF THE WORKSHOPS AND
6 CONFERENCE CALLS.

7

8 A. At the first workshop, suggestions were made that the process be
9 expanded to include:

- 10 1) defect change requests for both documentation and software that
11 are BellSouth- and CLEC-initiated, and CLEC-affecting;
- 12 2) BellSouth-initiated enhancement requests that are CLEC-affecting
13 (CLEC-initiated enhancement requests are already included in the
14 existing process.);
- 15 3) BellSouth's escalation and defect notification processes;
- 16 4) formalization of escalation and defect notification processes;
- 17 5) definition of how the new processes will be incorporated into the
18 existing change control structure;
- 19 6) monthly status update meetings that are open to all CLECs;
- 20 7) new e-mail process for system outages and defect notices.

21

22 Q. DID BELL SOUTH MAKE THESE ENHANCEMENTS?

23

24 A. Yes.

25

1 Q. DID BELLSOUTH CHANGE THE NAME AS A RESULT OF THE
2 WORKSHOPS AND CONFERENCES?

3

4 A. Yes. The name was changed from EICCP to Change Control Process
5 (“CCP”) to reflect a broadened scope to include, among other changes,
6 manual processes in addition to the existing electronic interfaces.

7

8 Q. WHAT STEPS DID BELLSOUTH TAKE TO OBTAIN AN AGREEMENT
9 FROM THE CLEC PARTICIPANTS REGARDING THE CHANGES TO
10 THE CCP?

11

12 A. In an effort to obtain agreement from the CLEC participants, BellSouth
13 posted the Change Control Process Interim Document (“Interim CCP”) on
14 the website on March 22, 2000. In order to obtain concurrence from the
15 CLEC community within the BellSouth region, BellSouth posted Carrier
16 Notification Letter SN91081679 on the Interconnection Website on March
17 23, 2000 announcing the Interim CCP and requesting input from the CLEC
18 community by April 10, 2000. The Website address is:

19 <http://www.interconnection.bellsouth.com/carrier>. Exhibit RMP-7 provides
20 a copy of Carrier Notification Letter SN91081679.

21

22 Q. DID THE INDUSTRY REACH AN AGREEMENT TO IMPLEMENT THE
23 NEW CCP?

24

1 A. No. BellSouth attempted to gain approval of the CCP from the
2 participating CLECs. Even though all participants agreed that the EICCP
3 needed to be changed, industry approval was not obtained as to the
4 actual Interim CCP. However, the CLEC participants and BellSouth did
5 agree to a three-month trial period for the Interim CCP. The Interim CCP
6 became effective on April 17, 2000. BellSouth posted Carrier Notification
7 Letter SN91081733 to the website, on April 14, 2000, announcing
8 implementation of the Interim CCP on April 17, 2000 and directing the
9 CLECs to the new Interim CCP website. Exhibit RMP-8 is a copy of
10 Carrier Notification Letter SN91081733. The most recent version of the
11 BellSouth Change Control Process document, Version 2.0, dated August
12 23, 2000, is posted on the website at
13 http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.htm
14 (Exhibit RMP-5)

15
16 Q. WHAT ACTIONS HAVE BEEN TAKEN SINCE THE THREE-MONTH
17 TRIAL PERIOD ENDED?

18
19 A. The three-month trial period ended in July 2000. BellSouth told the
20 CLECs in the June 26, 2000 Monthly Status Call meeting that a vote
21 would be taken at the July 26, 2000 Monthly Status Call meeting.
22 However, the July 26 meeting lasted 3 hours, which was well over the
23 allotted time. As a result the CCP participants were not requested to vote
24 to establish the new "baseline" CCP document. Instead, the matter was
25 carried over, with BellSouth indicating that the vote would be taken at the

1 next scheduled Monthly Status Call meeting in August. During the August
2 23, 2000 Monthly Status Call meeting, the CLEC participants agreed by a
3 vote of 6-3 to accept the new "baseline" CCP document.

4
5 Exhibit RMP-9 is a copy of the June 26, 2000 Monthly Status Call minutes.
6 Exhibit RMP-10 is a copy of the August 23, 2000 Monthly Status Call
7 minutes.

8
9 Q. YOU STATED EARLIER THAT THERE ARE APPROXIMATELY ONE
10 HUNDRED (100) CLECS PARTICIPATING IN THE CCP. DO ALL OF
11 THEM PARTICIPATE IN EACH MONTHLY MEETING?

12
13 A. As stated previously, approximately 100 CLECs are *currently* (as of
14 December 31, 2000) registered as participants of the Change Control
15 Process. At the time of the August 23, 2000 voting, there were eighty-
16 three (83) registered members. However, not all of them participate in any
17 given meeting.

18
19 As additional information, there are approximately 1,600 Commission- or
20 Authority-approved CLECs in the nine-state BellSouth region, and
21 approximately 300 of them are actually doing business in the local
22 telecommunications market (as of 4th quarter 2000). In Kentucky, those
23 numbers are approximately 131 and 81 respectively. BellSouth has made
24 a proactive effort to inform all CLECs region-wide about the CCP, and has
25 encouraged their membership and active involvement.

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Even though a meeting agenda is prepared and distributed prior to each meeting, a review of our records for the months March 2000 to October 2000 indicate an average of only ten CLECs, with few exceptions, participate in the CCP meetings. From the July 26, 2000 Monthly Status Call minutes attached in Exhibit RMP-11, it can be seen that only a few CLECs are consistently active in this process.

Q. WILL BELLSOUTH CONTINUE TO ENHANCE THE CHANGE CONTROL PROCESS?

A. Yes. As previously discussed, change control is an ever-evolving process and the approved CCP document is a “baseline, living” document. BellSouth is committed to the change management process; and therefore, will continue to consider input that will enhance the process to best serve the CLEC community as a whole.

For instance, BellSouth has initiated a series of CCP Process Improvement meetings devoted to improving the process. CCP Process Improvement Meetings were conducted on October 17, 2000, November 1, 2000, December 7, 2000 and January 10, 2001. Among the items discussed during the Process Improvement meetings were:

- 1) Revision history on Carrier Notifications related to documentation updates/upgrades

- 1 2) Defect/Expedite Process
- 2 3) BellSouth Release Management milestones (Future Releases
- 3 schedule or calendar)
- 4 4) Coding Changes
- 5 5) BellSouth's internal process for scheduling prioritized change
- 6 requests
- 7 6) AT&T's suggested changes ("marked-up version") to CCP
- 8 Document Version 2.0
- 9 7) A process for appealing BellSouth release schedules
- 10 8) Timeframes for providing draft and final user requirements
- 11 associated with releases
- 12 9) A process for inclusion of non-OBF standard requests

13

14 Exhibit RMP-12 provides a copy of the October 17, 2000 meeting minutes,
15 Exhibit RMP-13 provides a copy of the November 1, 2000 meeting
16 minutes, RMP-14 provides a copy of the December 7, 2000 meeting
17 minutes, and RMP15- provides a copy of the January 10, 2001 meeting
18 minutes.

19

20 A. HAS AT&T SUGGESTED CHANGES TO THE BELLSOUTH CCP
21 DOCUMENT?

22

23 A. Yes. In an attempt to arbitrate this issue in other states, AT&T has filed
24 suggested changes to the CCP document in the form of marked-up copies
25 of various versions of BellSouth's CCP document. On April 27, 2000,

1 AT&T filed a marked-up copy of the BellSouth CCP Interim Version 1.4
2 document in its Arbitration Proceeding before the North Carolina Utilities
3 Commission. The Interim CCP Version 1.4 with AT&T's suggested
4 changes was a 49-page document with proposed substantive changes on
5 18 pages. A copy of the CCP Interim Version 1.4 document with AT&T's
6 Proposed Changes is provided in Exhibit RMP-16. Of AT&T's suggested
7 changes, BellSouth agreed with the following changes suggested by
8 AT&T:

- 9
- 10 1) Testing added to Process list (added page 7, version 2.0)
- 11 2) Broader definition of term "defect" (added page 11, version 2.0)
- 12 3) Three Impact Levels of High, Medium, and Low added to Type-6
13 Defect/Expedited Process (added page 25, version 2.0)
- 14 4) Conference call used to discuss Type-6 Workaround, if appropriate
15 (added page 29, version 2.0)
- 16 5) Agreed to proposed Introduction of New Interfaces language
17 provided that portion of BellSouth's language struck by AT&T
18 remains in document
- 19

20 In an attempt to arbitrate this issue in the proceeding before the Georgia
21 Public Service Commission, AT&T filed a copy of BellSouth's CCP
22 Version 2.0 document with suggested changes, some of which differ from
23 the changes AT&T submitted to the North Carolina Utilities Commission.
24 The CCP Version 2.0 document with AT&T's suggested changes was
25 submitted to the Georgia Commission on September 22, 2000. The

1 document with AT&T's suggested changes is a 70-page document with
2 proposed substantive changes on 24 pages. The major topics for which
3 AT&T is currently requesting changes can be divided into the following
4 groups:

- 5 1) Training
- 6 2) Rejection/Cancellation/Reclassification of change requests
- 7 3) Sizing/sequencing of prioritized change requests
- 8 4) Defect/ Expedite Feature Change Process
- 9 5) Software Release Notification schedule
- 10 6) Dispute Resolution Process
- 11 7) Changes to Process
- 12 8) Escalation Process
- 13 9) Testing

14
15 In addition to trying to arbitrate these issues before the state commissions,
16 AT&T submitted a CCP Change Request, Log # CR0171, on September
17 9, 2000 requesting that the BellSouth "baseline" CCP document be
18 modified to include the changes outlined in AT&T's marked-up CCP
19 Version 2.0 document, which is the process that should have been
20 followed in the first place. AT&T's marked-up CCP Version 2.0 document
21 was discussed during the CCP Process Improvement Meeting conducted
22 on October 17, 2000. It was decided that a sub-team was needed to
23 review and discuss AT&T's proposed changes and to get other CLEC
24 participants' input and concerns. AT&T's CCP representative facilitated a
25 sub-team review meeting on October 27, 2000 with the CLEC participants

1 and BellSouth in attendance. A copy of the AT&T Change Request
2 including the CCP Interim Version 2.0 document with the sub-team's
3 Proposed Changes is provided in Exhibit RMP-17. A copy of AT&T's
4 minutes from the October meeting are provided in confidential Exhibit
5 RMP-18.

6

7 Q. WHAT HAS BEEN BELLSOUTH'S RESPONSE TO THE SUB-TEAM'S
8 SUBMISSION OF ITS MARKED-UP CCP VERSION 2.0?

9

10 A. On December 5, 2000, BellSouth made available to the CLECs its own
11 proposal regarding changes to the CCP Version 2.0 to be considered at
12 the December 7, 2000 CCP Process Improvement meeting. BellSouth's
13 version reflects a good-faith effort to incorporate all of the reasonable and
14 doable changes proposed by AT&T and the CLECs. A copy of the CCP
15 Version 2.0 document with BellSouth's proposed changes – and also
16 containing the sub-team's proposed changes – is provided as Exhibit
17 RMP-19.

18

19 Q. BASED UPON THE DECEMBER 7, 2000 PROCESS IMPROVEMENT
20 REVIEW MEETING, HAS A NEW CHANGE CONTROL PROCESS
21 DOCUMENT BEEN FINALIZED AND ACCEPTED FOR POSTING ON
22 THE CCP WEBSITE?

23

24 A. Not yet. No changes were officially accepted at the December 7, 2000
25 meeting. While a number of the proposed changes have been agreed

1 upon in principle, there are still some key issues remaining for further
2 discussion within the CCP, where BellSouth contends the discussions
3 belong. In that regard, the CLECs and BellSouth agreed to hold a full-day
4 session on January 10, 2001 to attempt to reach agreement on the
5 document. A copy of the minutes of the December 7, 2000 meeting is
6 provided as Exhibit RMP-14.

7

8 Q. WHAT WAS THE OUTCOME OF THE JANUARY 10, 2001 PROCESS
9 IMPROVEMENT REVIEW MEETING?

10

11 A. As reflected by the meeting minutes (Exhibit RMP-15), the bulk of the
12 meeting was spent discussing the proposed changes submitted by the
13 CLECs and BellSouth, and the proposed voting procedures which would
14 be used to determine which changes should be accepted and which
15 should be either rejected or deferred. All participants in the meeting
16 agreed that open action items would not be included in the voting. That is,
17 if we were still working on a particular aspect of the change control
18 process, that portion would not be considered in the vote that was
19 scheduled. Only completed items would be addressed.

20

21 AT&T's CCP representative proposed an e-mail ballot, listing separately
22 each proposed change to be considered, and indicating for each proposed
23 change whether simple consensus (general agreement by CLECs and
24 BellSouth) or contested consensus (CLECs and BellSouth could not reach
25 agreement) had been reached during the meeting. BellSouth agreed to

1 provide an explanation for its inability to support any proposed change that
2 was to be voted upon.

3
4 All meeting participants agreed that the ballot would be sent to the entire
5 membership of the CCP, again confirming the truly collaborative nature of
6 the CCP, and that the scope of the CCP is bigger than just AT&T and
7 BellSouth. AT&T's representative agreed to assist with the ballot as well
8 as with the rules associated with the voting.

9

10 Q. PLEASE DESCRIBE HOW THE VOTING PROCESS WORKED, AND
11 GIVE AN OVERVIEW OF THE RULES OF THE VOTING.

12

13 A. The meeting participants agreed that the e-mail ballot would contain only
14 those changes that were discussed in the January 10 meeting. After the
15 e-mail ballot was jointly developed by the Change Control Management
16 Team and AT&T, it was e-mailed by Change Control to the CCP
17 membership on January 18, 2001. A copy of the ballot and the associated
18 voting instructions is provided as Exhibit RMP-20.

19

20 The ballot contained 35 items to be voted, with each issue marked either
21 as 'Meeting Consensus' or 'Contested Consensus'. As agreed in the
22 January 10 meeting, issues that were still open would not appear on the
23 ballot. To summarize the instructions for the voting: a) a CLEC had to be
24 a registered user of the CCP at the time of ballot distribution in order to
25 cast a valid vote; b) one vote per CLEC; c) for each Contested Consensus

1 item, a voting CLEC had to select one recommendation with which to
2 agree, and then rank that item based upon a scale range which included
3 'Agree', 'Somewhat Agree', 'Neutral', 'Somewhat Disagree', and
4 'Disagree'; d) two-thirds of votes cast in the categories ranging from
5 'Agree' to 'Somewhat Disagree' would indicate an industry consensus,
6 and changes receiving that consensus would be implemented, unless
7 BellSouth indicated it currently could not support a particular issue as
8 proposed.

9
10 BellSouth also indicated in the voting instructions that it was including Item
11 34 (Dispute Resolution) as a Contested Consensus, although there had
12 been no objections at the January 10 meeting. AT&T indicated that it
13 needed to "think" about it, and it later submitted a revised request of this
14 section to Change Control.

15
16 It was also noted that Item 35 (Changes to the Process) was included on
17 the ballot as a Contested Consensus, and included language that had
18 been discussed at the January 10 meeting as language that BellSouth
19 could support. That discussion did not generate any objections regarding
20 the inclusion of that language.

21
22 Voters were instructed to return the completed ballot via e-mail to Change
23 Control with a time-stamp of no later than midnight on January 25, 2001 to
24 be valid. Change Control indicated that the results of the voting would be
25 shared during the January 31, 2001 status review meeting.

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Q. WHAT OCCURRED NEXT DURING THE VOTING PROCESS?

A. Not surprisingly, AT&T found cause to raise an objection. The same day that the ballot was e-mailed (January 18), AT&T complained to Change Control that Item 35 did not reflect the intent of the CLECs and the item should be removed from the ballot. AT&T said that the proposed voting model that had been agreed upon at the January 10 meeting for this specific vote should have been inserted as the new CLEC recommendation in Item 35. Change Control noted that there was no consensus at the meeting for that being the case. In order to pacify AT&T, however, Change Control then issued another e-mail asking that the participants in the January 10 meeting provide feedback on AT&T's claim, stating that CLEC consensus would determine whether to retain Item 35 on the ballot.

Q. WHAT WAS THE RESULT OF THAT FEEDBACK?

A. As no objections were submitted by the CLECs, Change Control issued yet another e-mail on January 19 explaining that it was removing Item 35 from the ballot and citing AT&T's "major contention" as the reason. Another version of the ballot – minus Item 35 – was attached to the e-mail, and I have included that ballot as Exhibit RMP-21.

1 Q. WHAT WERE THE FINAL RESULTS OF THE VOTING FOR THE
2 REMAINING ITEMS ON THE BALLOT?

3

4 A. When the votes were tallied, 27 of the 34 items (those labeled 'Meeting
5 Consensus') were accepted for adoption into the CCP document. The
6 seven remaining 'Contested Consensus' items, plus the item that had
7 been removed from the original ballot, were scheduled for further
8 discussion at the next meeting to be held on or about February 21, 2001.
9 I would like to add that the items that are still open and that were not part
10 of the ballot would continue to be developed in an effort to achieve
11 consensus within the CCP.

12

13 Q. HOW MANY VALID BALLOTS DID CHANGE CONTROL RECEIVE
14 FROM CLECS?

15

16 A. A total of nine (9) CLECs returned valid ballots in this voting process. In
17 addition, BellSouth also returned a ballot.

18

19 Q. SINCE A NUMBER OF ITEMS ON THE BALLOT WERE ACCEPTED
20 FOR ADOPTION INTO THE CCP DOCUMENT, WHAT DOES CHANGE
21 CONTROL PLAN TO DO NEXT?

22

23 A. When the results of the voting were provided to the CLECs at the January
24 31 monthly status meeting, the CLECs were told that the accepted
25 changes would be incorporated into a revised CCP document Version 2.1,

1 and posted to the BellSouth Interconnection website on or about February
2 9, 2001. I have provided minutes of the January 31 meeting as Exhibit
3 RMP-22, and the current draft of the soon-to-be-posted CCP Version 2.1
4 document as Exhibit RMP-23. Additionally, the CCP will develop a
5 “working” CCP document version, with a color-coded markup to show
6 which issues from the previous marked-up versions are still unresolved,
7 contested or open, and will depict the CLEC- and BellSouth- proposed
8 changes for those issues. Since this Version 2.1 has not been issued,
9 however, I will confine my testimony to the most recent version that we
10 have – Version 2.0. Again, however, this simply highlights that this is a
11 changing document and not one appropriate for arbitration between two
12 parties.

13
14

15 Q. EVEN THOUGH A NEW CHANGE CONTROL PROCESS DOCUMENT
16 HAS NOT BEEN POSTED, AND OTHER ISSUES REMAIN TO BE
17 FINALIZED, CAN YOU PROVIDE HIGHLIGHTS OF SOME OF THE
18 MAJOR CLEC-REQUESTED CHANGES TO WHICH BELL SOUTH
19 AGREES?

20

21 A. Certainly. One of the CLECs’ priorities is the separation of the expedite
22 process from the Type-6 defect notification process. An expedite in this
23 case is defined as the inability for a CLEC to process certain types of
24 orders based on the existing functionality of BellSouth's OSS's. A Type-6
25 defect is a CLEC-impacting defect caused by a BellSouth system not

1 operating as specified in baseline business requirements or published
2 business rules. BellSouth has agreed to such a process, and has
3 presented its version of such a process to respond to CLEC business
4 needs (Exhibit RMP-19, pages 37-41). The recommendation provides a
5 clear definition of “expedites”, along with safeguard parameters to ensure
6 the proper use of the process.

7
8 BellSouth also agreed to additional advance notification to the CLECs for
9 certain kinds of changes. As examples, BellSouth agrees to provide draft
10 and final user requirements for software releases no later than 90 and 45
11 days in advance, respectively; notification of the implementation of a new
12 Telecommunications Industry Forum (“TCIF”) map no later than 180 days
13 in advance of the implementation release date; and draft and final user
14 requirements for the new TCIF map no later than 120 and 60 days,
15 respectively, in advance of the release implementation date (Exhibit RMP-
16 19, page 22). I’d like to point out that the CLECs have since asked for 240
17 days advance notification of the implementation of a new TCIF map. Until
18 the December 7, 2000 meeting, BellSouth was under the impression that
19 180 days was sufficient for the CLECs. (NOTE: The Telecommunications
20 Industry Forum – TCIF – has recently changed the designation of its
21 program releases to Electronic Local Mechanized System – ELMS. For
22 purposes of consistency in this testimony, I will continue to refer to TCIF)

23
24 BellSouth has also agreed to a proposed change of a reduction in defect
25 cycle and response time intervals, i.e., a reduction from four business

1 days to two business days for the development and validation of
2 workarounds for high-impact defects (Exhibit RMP-19, page 47).

3

4 Q. WHAT ARE SOME OF THE PROPOSED CLEC CHANGES THAT
5 BELLSOUTH IS NOT ABLE TO SUPPORT, AND CAN YOU PROVIDE
6 BELLSOUTH'S REASONS FOR SUCH?

7

8 A. As explained earlier, BellSouth has made a good-faith effort to incorporate
9 as many reasonable and doable CLEC-proposed changes into its own
10 CCP proposal as is possible. As would be expected, not all proposed
11 changes fall into that category.

12

13 One of the CLEC-proposed changes is a reduction in the cycle time to
14 review a change request ("CR") for acceptance. The cycle time is
15 currently 20 days. The CLECs – primarily AT&T – have requested a 10-
16 day window for this step in the change request process. AT&T has
17 provided no analysis or basis for cutting the cycle time in half. BellSouth
18 feels that such a review cannot be done in less than 20 days because that
19 step involves reviewing the change's impact on other systems, manual
20 processes, documentation and training. Other steps include determining if
21 a CR already exists, determining if it's a CLEC training issue, or
22 determining if the CR meets the criteria for an expedited feature. In short,
23 BellSouth wants to ensure that appropriate front-end planning occurs in
24 order to minimize the possibility of defects later. All of this takes time and

1 20 days is a reasonable period to accomplish these steps. (Exhibit RMP-
2 19, page 24)

3
4 On another issue, BellSouth has added a sub-section to the Retirement of
5 Interfaces section – where BellSouth already states that we provide
6 CLECs 180 days advance notification for the retirement of interfaces – to
7 indicate we'll provide CLECs 120 days advance notification for the
8 retirement of old *versions* of interfaces (Exhibit RMP-19, page 57). This
9 gives sufficient time for CLECs to migrate to the more current versions of
10 interfaces where the greatest number of features and any defect
11 corrections reside. Although BellSouth feels that the 120-day notification
12 is sufficient, AT&T has requested 180 days, again with no basis provided
13 for their position. I'd like to point out also that in this section BellSouth has
14 agreed to provide user requirements for new versions of interfaces 180
15 days in advance.

16
17 The issue of emergency changes continues to be one in which BellSouth
18 believes there already exists a process within the CCP. True
19 emergencies – defined as a total interface outage – are handled by the
20 Electronic Communications Support (“ECS”) group. At issue here are
21 high-impact defects, which are not true emergencies. High-impact defects
22 are appropriately handled in a fast turnaround time via the issuance of a
23 Type-6 defect change request.

24

1 In summary, while AT&T is attempting to arbitrate these proposed
2 changes to the CCP before this Commission, AT&T is also actively using
3 the CCP in an effort to make these changes. As discussed previously, the
4 CCP was established through collaboration between interested CLECs
5 and BellSouth. The changes submitted through this process are handled
6 collaboratively by the participating CLECs and BellSouth. Therefore, the
7 CCP, utilizing input from the CCP Process Improvement Sub-Team, is the
8 appropriate forum for review and acceptance or rejection of the CCP
9 changes suggested by AT&T.

10

11 Q. WHAT INTERFACES ARE COVERED BY THE CCP?

12

13 A. The CCP covers change requests for the LENS, TAG, EDI, TAFI, ECTA,
14 and CSOTS electronic interfaces and the associated manual processes
15 that have the potential to impact the ordering, pre-ordering and
16 maintenance and repair functions utilized by BellSouth and the CLECs
17 connected to BellSouth's interfaces.

18

19 Q. WHAT TYPES OF CHANGES DOES THE CCP HANDLE?

20

21 A. The CCP handles the following types of changes:

22

1) Software

23

2) Hardware

24

3) Industry standards

25

4) Products and Services (i.e., new services available via the in-scope

- 1 interfaces)
- 2 5) New or revised edits
- 3 6) Process (i.e., electronic interfaces and manual processes relative to
- 4 order, pre-order, maintenance and testing)
- 5 7) Regulatory
- 6 8) Documentation (i.e., business rules for electronic and manual
- 7 processes relative to order, pre-order, maintenance)
- 8 9) Defects/expedites

9

10 Q. WHAT IS NOT INCLUDED UNDER THE CCP?

11

12 A. As documented in the CCP, the CCP does not include the following:

13 BonaFide Requests (“BFR”), production support, contractual agreement

14 issues, collocation, testing support (although BellSouth has agreed in its

15 proposed changes to support this), and helpdesk-type issue resolution

16 questions. Change requests of this nature will be handled through

17 existing processes.

18

19 Q. HOW ARE THESE EXCLUDED ITEMS HANDLED?

20

21 A. BellSouth’s Interconnection Account Team handles contractual agreement

22 issues, testing support, BFR, and collocation. The BellSouth Customer

23 Support Manager or Account Team handles issues related to production

24 support and issue resolution.

25

1 Q. TURNING TO THE ACTUAL OPERATION OF THE CCP, HOW ARE
2 CHANGE REQUESTS CLASSIFIED IN THE CCP?

3

4 A. Pursuant to the CCP, all change requests are classified by type. The
5 definition of each type and the process flow for each (including the
6 intervals) are detailed in the CCP referenced above. The following table
7 summarizes the types.

8

9

Type	Name
Type 1	System Outage
Type 2	Regulatory Change
Type 3	Industry Standard Change
Type 4	BellSouth-Initiated Change
Type 5	CLEC-Initiated Change
Type 6	CLEC-Impacting Defect/Expedite

10

11 Q. CAN YOU EXPLAIN THE DIFFERENT CHANGE REQUEST TYPES?

12

13 A. Yes. Even though not specifically stated as such in the CCP, the six types
14 can be sub-divided into three distinct categories. These categories are
15 represented in the CCP document as three separate, distinctive process
16 flows. The following table summarizes the categories:

17

18

19

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1

Category	Type	Description
Category 1	Type 1	System totally unusable or degradation in existing feature or functionality
Category 2	Types 2- 5	Change requests for system enhancements, manual and/or business processes, can also include issues for pre-order, orders, maintenance/repair
Category 3	Type 6	CLEC impacting defect in production – system not operating as specified in baseline business requirements or published business rules, includes documentation defects Expedited Feature – inability for CLEC to process certain types of orders to BellSouth because of a problem on BellSouth's side of the interface.

2

3

4 Q. PLEASE PROVIDE AN EXPLANATION OF A CATEGORY-1 CHANGE
5 REQUEST.

6

7 A. Category 1 covers the processes that are used in the event of a system
8 outage to report, resolve, and communicate information regarding the
9 outage in an expeditious fashion. These processes are used to keep all
10 system users informed about a specific situation. Category 1 issues are
11 included in the CCP so that if there are to be changes in the identification,
12 notification and resolution process, the CLECs and BellSouth will jointly
13 develop how these changes will be made.

14

15 Category 1 involves a situation where an electronic interface is totally
16 unusable. That is, the CLECs' pre-order, order or maintenance/repair

1 reports cannot be submitted or will not be received by BellSouth. In this
2 situation, processes are in place to identify the problem, notify those
3 affected, and provide statuses regarding the resolution of the problem.
4 The CCP deals with proposed changes in the processes.

5
6 To make this clearer, let me describe the current processes involved with
7 a system outage. Either BellSouth or the CLEC can originate notification
8 of an outage. If a CLEC originates the notice, the CLEC reports it via a
9 telephone call to BellSouth's Electronic Communications Support ("ECS")
10 help desk. The ECS records and tracks the outage report and works to
11 resolve the outage. If the outage is not resolved within 20 minutes of ECS
12 receiving the report, the CLEC community is notified of the outage via a
13 notification placed on BellSouth's CCP website.

14 http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.html

15
16 Exhibit RMP-24 is a screen snapshot from the website for Type-1 System
17 Outages. In addition, an e-mail is sent to the CLECs participating in the
18 CCP. The CLEC industry is notified on two to four hour intervals until the
19 resolution is determined. A resolution determination is posted to the CCP
20 website within 24 hours of the outage being reported to the ECS. The
21 final resolution is posted to the CCP website within three days of the
22 outage being reported. The escalation process may be utilized for the
23 status notification, resolution notification, or final resolution notification
24 steps if the time frames are not met and/or the responses are not
25 satisfactory.

1

2 Following is an example of a Category 1 outage reported to BellSouth:

3

Initial Notification	Status Notification	Resolution Notification	Final Resolution
<p>1. ECS received report of outage from CLEC on 5/19/00 at 9:47am.</p> <p>2. CLEC advised internally performed outage resolution activities.</p> <p>3. CLEC provided trouble description "Security 2207 process is hung on TAG box 90.70.124.148".</p> <p>4. ECS assigned case # 421221, class 1 at 9:54.</p> <p>5. ECS internally reports trouble at 9:56/9:57.</p>	<p>6. ECS receives internal report on status of trouble at 9:59.</p>	<p>7. ECS receives notification that internal report trouble is cleared 5/19/00 at 10:00</p>	<p>8. Posted final resolution notification TAG 2207 System Outage #1105 on CCP website at 10:08. Duration shown on website 9am to 10am.</p> <p>9. 10:09 Sent TAG Trouble email, closing ticket.</p> <p>10. Ticket closed 10:09.</p>

4

5

6 Q. PLEASE PROVIDE AN EXPLANATION OF A CATEGORY 3 CHANGE
7 REQUEST.

8

9 A. A Category 3 defect (I will come back to Category 2) involves a situation
10 where an interface is working, but not in accordance with the way it was

1 designed or in accordance with the business rules published by BellSouth
2 to the CLECs. Category 3 has recently been expanded and now also
3 includes expedited features, which includes problems that result in the
4 inability of an individual CLEC to process certain types of orders to
5 BellSouth due to a problem on BellSouth's side of the interface. BellSouth
6 calls these situations a defect/expedite feature. The defect/expedite
7 feature is the underlying problem, and what are covered by the CCP are
8 the identification, notification, and resolution processes for
9 defects/expedite features.

10

11 Defects/expedite features have the following three Impact Levels:

- 12 1) High Impact – failure causes impairment of critical system functions
13 and no electronic workaround solution exists. Expedited features
14 are treated as High Impact.
- 15 2) Medium Impact – failure causes impairment of critical system
16 functions; a workaround solution does exist
- 17 3) Low Impact – failure causes inconvenience or annoyance

18

19 The process, which provides for speedy treatments of defects, is as
20 follows: The identification of the Type-6 defect/expedite can be initiated by
21 BellSouth or the CLECs. The originator and the individual CLEC's
22 Change Control Manager ("CCCM") or the BellSouth Change Control
23 Manager ("BCCM") prepare the change request form with the related
24 requirements and specification attached if appropriate, i.e. Purchase
25 Order Number, Operating Company Name, interfaces affected, error

1 messages, etc. The request should also include a description of the
2 business need and details of the business impact. The request is
3 submitted to BellSouth via e-mail. Within one business day of receiving
4 the change request, the BCCM will:

- 5
- 6 1) Log the defect/expedite in the change request log;
- 7 2) Send acknowledgement to CLEC;
- 8 3) Review for completeness and accuracy;
- 9 4) Assign defect/expedite status;
- 10 5) Send clarification notification via e-mail to originator if appropriate.

11

12 Within the next three business days, the BCCM

- 13 1) Validates request is a defect/expedite;
- 14 2) Perform internal defect/expedite analysis;
- 15 3) Determine appropriate status;
- 16 4) Sends defect/expedite notification to CLEC community via e-mail;
- 17 1) Posts defect/expedite on CCP website.

18

19 Within the next 4 business days, the BCCM will:

- 20 1) Identify a defect workaround;
- 21 2) Send workaround process to originator via e-mail;
- 22 3) Alert CLEC community via e-mail and;
- 23 4) Post the workaround process on CCP website or, if appropriate,
24 notify via conference call;
- 25 5) Update request on change control log.

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Importantly, with a Category 3 defect, the interface is working, but not in accordance with the BellSouth baseline business requirements or in accordance with BellSouth published business rules and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

The BCCM will provide a status of the defect/expedite at the Monthly Status Meeting and solicit CLEC and BellSouth input if appropriate. The BCCM will schedule and evaluate the defect/expedite based on the business impacts and capacity.

BellSouth will use its best efforts to schedule expedite features in the current release, next release or point release. BellSouth will utilize its best efforts to implement High Impact “validated” defects within a 4 – 25 business day range.

I do want to note that BellSouth has changed its definition of what constitutes a defect, based on its reevaluation of its previous definition during the recent North Carolina proceedings with AT&T. As previously stated, the defect notification process was also recently expanded to include expedited features. BellSouth believes that these changes in the definition of “defect” and the addition of a new category of “expedited features” will help substantially in resolving issues with AT&T related to this subject.

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I also want to explain BellSouth’s position on the time frames in which an activity will be concluded, since that inevitably is an issue with AT&T. BellSouth has proposed time frames for all of these activities that BellSouth believes, based on its experience, to be reasonable “outside” time limits. BellSouth intends, whenever a time frame is set out for accomplishing a particular step in a process, of accomplishing that step as quickly as possible. If a step takes 20 minutes and a full business day is allotted, the step will take 20 minutes. The problem with all of this is that while we are attempting to categorize problems into neat little pigeonholes, that rarely will be the case. Some problems will take longer than others to resolve, hence the use of outside time frames for the steps.

Q. PLEASE EXPLAIN HOW A PROPOSED CHANGE REQUEST FOR CATEGORY 2 WOULD BE HANDLED.

A. Category 2 is a situation where a change request is submitted to enhance systems, manual and/or business processes. Significantly, Category 2 doesn’t involve a system failure or a system that isn’t working the way it is suppose to work. A CLEC or BellSouth can determine the need for, and originate, a Category 2 change request. The originator, in conjunction with either the BCCM or the CCCM, submits the change request and the appropriate documentation to BellSouth via e-mail. These change requests follow a normal course of business utilizing the CCP. In other words, these change requests are not treated in an expedited manner.

1 Instead, each is thoroughly assessed and presented to participating
2 members of the CCP at scheduled meetings for input and prioritization.

3 The process flow as documented in the CCP is described below.

4

5 Within two to three days of receipt of the change request, the BCCM takes
6 the following action:

- 7 1) Logs the request in change control log;
- 8 2) Sends an acknowledgement to the originator via e-mail;
- 9 3) Reviews change request for completeness and accuracy;
- 10 4) Assigns change request status code;
- 11 5) If appropriate, sends clarification to originator via e-mail.

12

13 Within the next twenty days, the BCCM performs the following activities:

14

- 15 1) Reviews change request and related documentation for content;
- 16 2) Review for impacted areas, such as system, manual process,
17 documentation and adverse impacts;
- 18 3) BellSouth may reject the request based on reasons such as, cost,
19 industry direction, or technically not feasible to implement;
- 20 4) If rejected, notification provided to originator;
- 21 5) If rejected, reason shared with CLECs for input;
- 22 6) If rejected and if requested, subject matter expert (“SME”) available
23 in Monthly Status Meeting to discuss reason and alternatives;
- 24 6) Posts appropriate status on change control log.

25

1 Both the BCCM and CCCM, within the next five to seven (5-7) days,
2 prepare for the Change Review Meeting. The BCCM performs the
3 following:

- 4 1) Prepares agenda;
- 5 2) Makes meeting preparations;
- 6 3) Updates current request status on change control log;
- 7 4) Prepares and posts change control log to CCP website.

8

9 The CCCM performs the following:

- 10 1) Analysis pending requests;
- 11 2) Determine priorities for change requests and establish desired/want
12 dates;
- 13 3) Create draft priority list.

14

15 The pending change request is reviewed during the Monthly Status
16 Meeting.

17

18 During the Prioritization Meeting, which is conducted as needed based on
19 the published release schedule, the change requests are reviewed,
20 initiators present the change requests, impacts are discussed, requests
21 are prioritized, and the final list of prioritized change requests, also known
22 as the final Candidate Requests list, is developed.

23

1 Within two days of the Monthly Status/Prioritization meeting, the current
2 status of the request is updated on change request log, the meeting
3 results prepared and the log and results are posted on the CCP website.

4
5 During the next thirty (30) days, BellSouth and the CLECs perform
6 analysis, impact, sizing, and estimating activities for the prioritized items.
7 During this process BellSouth provides requirements and the technical
8 references to the CLECs. Additionally, face-to-face meetings or
9 conference calls, or both, are held by BellSouth and the CLECs to discuss
10 the programming and coding details for the changes.

11
12 The next step is the Release Package Meeting. During the meeting, the
13 parties evaluate the proposed release schedule and BellSouth and the
14 CLECs jointly create the Approved Release Package. The non-scheduled
15 change requests are determined and returned to the next scheduled
16 Change Review Meeting. The date of the initial Release Management
17 Project Meeting is established.

18
19 Within two days of the Release Package Meeting the following meeting
20 documentation is released.

- 21 1) Approved Release Package;
- 22 2) Updated Change Request Log;
- 23 3) Meeting minutes;
- 24 4) Date for initial Release Management Project Meeting.

25

1 Q. NOW THAT YOU HAVE DESCRIBED THE PROCESS FOR HANDLING
2 THE CATEGORY 2 CHANGE REQUESTS, PLEASE DESCRIBE HOW
3 THE CHANGES ARE IMPLEMENTED?
4

5 A. A Category 2 change to an electronic interface is usually "packaged" with
6 other changes or enhancements to be implemented together in a release.
7 The releases require programming by both the CLECs and BellSouth.
8

9 Q. WHEN DOES BELLSOUTH SEND A FORMAL CARRIER NOTIFICATION
10 LETTER OF AN APPROVED INTERFACE CHANGE TO ALL OF THE
11 CLECS?
12

13 A. BellSouth formally notifies CLECs of the changes comprising a major
14 release of the electronic interfaces thirty (30) days in advance of
15 implementation. It is important to remember that, long before CLECs are
16 formally notified about changes to the interfaces, the potential changes
17 are first discussed with the participating CLECs during the CCP meetings.
18 All notification letters for 1997-2000 may be reviewed at the
19 Interconnection Website.

20 <http://www.interconnection.bellsouth.com/markets/lec.html>
21

22 Q. WHAT IS CONTAINED IN THE NOTIFICATION LETTERS TO THE
23 CLECS?
24

1 A. The notification letters are intended to summarize the changes being
2 implemented with a particular release and to identify possible "down time"
3 for the impacted interface(s) due to system loading requirements for the
4 release. These letters are not intended to be technical references for use
5 by CLEC software developers. As discussed previously, BellSouth
6 provides CLECs with this information through other sources well in
7 advance of the formal notification.

8

9 **a) INTRODUCTION OF NEW INTERFACES**

10 Q. NOW LET'S TURN TO THE SUB-ISSUES RAISED IN AT&T'S ISSUES
11 MATRIX, BEGINNING WITH THE INTRODUCTION OF NEW
12 INTERFACES. DOES THE CCP INCLUDE PROCESSES FOR THE
13 INTRODUCTION OF NEW INTERFACES?

14

15 A. Yes. The CCP contains the process for the introduction of new interfaces.
16 The process is described on page 35 of the CCP document (Exhibit RMP-
17 5). For the introduction of new interfaces, the document states:

18 BellSouth will introduce new interfaces to the CLEC
19 Community as part of the Change Control Process. A
20 description of the proposed interface will be submitted to the
21 BCCM [BellSouth Change Control Manager]. The BCCM
22 will add an agenda item to discuss the new interface at the
23 monthly status meeting. BellSouth will be given 30–45
24 minutes to present information on the proposed interface. If
25 BellSouth requests additional time for the presentation, a

1 separate meeting will be scheduled . . .The objective will be
2 to identify interest in the new interface and obtain input from
3 the CLEC community. BellSouth will provide specifications
4 on the interface being developed to the CLEC Community.

5
6 Thus, the CCP provides BellSouth and the CLECs with a meaningful
7 opportunity to discuss and provide input for the proposed new interfaces.
8 I do want to make it clear, however, that while the introduction of new
9 interfaces is clearly subject to the CCP; the development of new interfaces
10 is not.

11

12 Q. WHEN DOES A NEW INTERFACE BECOME SUBJECT TO THE CCP?

13

14 A. As documented on page 35 of the CCP, new interfaces are added to the
15 CCP as they are deployed. After that, any requested changes will be
16 managed by the CCP.

17

18 Q. WHY DO INTERFACES UNDER DEVELOPMENT NOT FALL UNDER
19 THE CCP?

20

21 A. BellSouth must have flexibility to develop interfaces to meet industry
22 standards and regulatory requirements. The process allows for and
23 encourages CLEC input, but new development is too critical to risk being
24 stymied in the process by CLEC disagreement. To ensure efficient and

1 up-to-date deployment of new interfaces, BellSouth must retain ultimate
2 control of their deployment.

3

4 Q. DOES A CLEC HAVE TO BE A USER OF AN INTERFACE IN ORDER
5 TO USE THE CCP?

6

7 A. No. A CLEC may place a "letter of intent", indicating that it intends to use
8 an interface, on file with the BellSouth Change Control Management. The
9 letter of intent will serve as the official notification to BellSouth and the
10 other CLEC CCP participants that the CLEC's intention is to use the
11 interface. By doing this the CLEC will be permitted to participate in the
12 submission and prioritization of change requests for that interface. This
13 enhancement is reflected in the CCP document Version 2.0.

14

15 Therefore, one of the parameters of the CCP is that a CLEC must be a
16 user of an interface or have a letter of intent on file to request changes to
17 that interface. Since part of the CCP is prioritizing potential changes to an
18 interface, it just makes sense that a CLEC must be a user of an interface
19 or have a letter of intent in order to vote and rank the potential change(s)
20 for that particular interface. This simply recognizes that the CLECs that
21 are either currently using or have officially provided their intention to use
22 these interfaces should have the first say on how the interfaces should be
23 changed. The specific prioritization voting rules are detailed in the CCP
24 document (page 33 of Exhibit RMP-5). Unfortunately, the nature of the
25 CCP is such that if developing interfaces were included in the CCP,

1 CLECs with no intention of using such interfaces could game the process
2 by voting for additional features and functionality that would increase the
3 time and the cost to BellSouth and rival CLECs to implement them.

4

5 **b) RETIREMENT OF EXISTING INTERFACES**

6 Q. IS THE RETIREMENT OF EXISTING INTERFACES SUBJECT TO THE
7 CCP?

8

9 A. Not per se, but based upon the discussions with interested CLEC
10 participants, language has been added to ensure that BellSouth only
11 retires interfaces that are not being used, or if BellSouth has a
12 replacement for an interface that provides equal or better functionality for
13 the CLEC than the existing interface. As previously mentioned, BellSouth
14 has also proposed language regarding advanced notification of 120 days
15 for the retirement of old *versions* of interfaces.

16

17 BellSouth believes that AT&T considers the two parties to now be in
18 general agreement on this issue. This is based upon testimony filed
19 recently with the Florida Public Service Commission (Docket 000731-TP)
20 and the Tennessee Regulatory Authority (Docket 00-00079) by AT&T
21 Witness Jay M. Bradbury. With respect to this issue for both proceedings,
22 Mr. Bradbury states in his testimony that “it appears the parties have
23 reached agreement on a portion (of) this issue. This language has been
24 enhanced by BellSouth and is now acceptable to AT&T”. While it may be

1 acceptable to AT&T, I reiterate that BellSouth still believes that any CLEC-
2 wide issue is an issue upon which the CCP should render final approval.

3

4 Information on the retirement of interfaces is located on page 35 of the
5 CCP document (Exhibit RMP-5). It states as follows:

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

16

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

21

22 Q. WHY IS THIS POLICY REASONABLE?

23

24 A. BellSouth is responsible for providing CLECs with the required OSS
25 functionality. Operational reasons, such as discontinued hardware,

1 software that cannot be upgraded, or lack of use, are legitimate business
2 reasons for retiring interfaces. If retirement were included in change
3 control, CLECs could vote to maintain obsolete or unused interfaces
4 simply to game the system. BellSouth should not be forced to carry the
5 unnecessary costs of maintaining obsolete or unused systems and
6 indeed, this is not in the CLECs' interest either because the OSS costs
7 would be passed to them.

8

9 Q. WHAT PRECAUTIONS WILL BELLSOUTH TAKE TO ENSURE THAT
10 THE RETIREMENT OF AN INTERFACE IS NOT DETRIMENTAL TO
11 CLECS?

12

13 A. It is not BellSouth's intent to take an interface out of service that would
14 have a detrimental impact on the CLEC community. BellSouth will take an
15 interface out of service only if the interface is not being used, or if
16 BellSouth has a replacement for an interface that provides equal or better
17 functionality for the CLEC than the existing interface. Furthermore, upon
18 giving notification that an interface is going to be taken out of service,
19 BellSouth will remain open to input from CLECs concerning its decision to
20 retire the interface in question. When it is determined appropriate to retire
21 an interface, BellSouth will ensure that the functionality provided by that
22 interface is available via another means and provide a mechanism to
23 assist in the ease of transition.

24

25

1 **c) EXCEPTIONS TO THE PROCESS**

2 Q. WHAT IS YOUR UNDERSTANDING OF THIS ISSUE?

3

4 A. AT&T's apparent desire to put "exceptions" to the process under the CCP
5 is difficult to understand. In its draft of the CCP, it has lumped exceptions
6 together with "expedites", but has not differentiated the two in any
7 meaningful way. Evidently, in spite of everything BellSouth has just been
8 discussing regarding the CCP, AT&T wants a process that allows it to
9 simply circumvent the entire CCP if AT&T thinks that step is warranted. I
10 say this because AT&T's draft simply provides no substantive information
11 about what an "exception" might be.

12

13 BellSouth feels strongly that all situations that would come before the CCP
14 are covered by one of the defined categories already in the process. The
15 process does not need to add terms and/or categories that have no
16 objective criteria to define them, thereby leaving their meaning open to
17 interpretation.

18

19 **d) DOCUMENTATION, INCLUDING TRAINING**

20 Q. IS DOCUMENTATION INCLUDED UNDER THE CCP?

21

22 A. Yes. Documentation is one of the categories that is included under the
23 CCP, as I described in my introductory remarks about Issue 22.
24 Additionally, documentation defects have been incorporated in the
25 defect/expedite feature definition. Specifically, the documentation

1 included in this process is the business rules for electronic and manual
2 processes relative to pre-ordering, ordering, and maintenance.

3

4 Q. WHERE IS TRAINING HANDLED WITHIN BELLSOUTH?

5

6 A. Training is handled by BellSouth's CLEC training department. BellSouth is
7 responsible for the development and delivery of all CLEC training
8 including related training material and aids. Of course, the training courses
9 that support the interfaces that fall under the CCP will be adapted by the
10 appropriate training development organization as the interfaces are
11 enhanced through the process, if there is a need.

12

13 Q. WHY IS AT&T CONCERNED WITH TRAINING AS IT RELATES TO THE
14 CCP?

15

16 A. In a similar proceeding in another state, AT&T cited a minor exception (#9)
17 noted by KPMG in the Florida Third Party Test. AT&T stated that the
18 exception was for BellSouth's "failure to document its training process."
19 That is a gross mischaracterization of both the quote and the fact of the
20 matter. In reality, KPMG identified BellSouth's "failure to have
21 documented procedures for CLEC training management practices and
22 program administration." That is different from deficiencies in actual
23 training materials and courses themselves, and has more to do with
24 'behind-the-scenes' issues such as BellSouth's documentation of its
25 qualification criteria for the selection of instructors. BellSouth is currently

1 formalizing those procedures in response to the exception, but the current
2 lack of such in no way prevents the delivery of CLEC training, or otherwise
3 harms the CLEC community. Frankly, BellSouth thinks it is another
4 indication that Third Party Testing will validate the adequacy of the CCP,
5 and that that validation further suggests the inappropriate inclusion of the
6 CCP in this proceeding.

7

8 e) **DEFECT CORRECTION** and

9 f) **EMERGENCY CHANGES** (defect correction)

10 Q. CAN YOU DISTINGUISH THESE TWO ISSUES?

11

12 A. A dispute existed about the definition of a defect and that may have given
13 rise to this sub-issue. I believe the disagreement of the definition of a
14 defect has been resolved. As mentioned previously, BellSouth believes a
15 process currently exists within the CCP to deal with true emergencies,
16 which are defined as system outages. Nonetheless, this is among the
17 issues being addressed as the review of the CLEC- and BellSouth-
18 proposed CCP changes continues.

19

20 Q. HOW ARE DEFECTS DEFINED UNDER THE CCP?

21

22 A. The definition of defects has been revised. The revised language as
23 stated on page 25 of the CCP document is as follows:

24 Any non-Type-1 change where a BellSouth interface used by
25 a CLEC which is in production and is not working in

1 accordance with the BellSouth baseline business
2 requirements or is not working in accordance with the
3 business rules that BST has published or otherwise provided
4 to the CLECs and is impacting a CLEC's ability to exchange
5 transactions with BellSouth. This includes documentation
6 defects.

7
8 This revised definition incorporates language to deal with concerns
9 expressed by AT&T. Specifically, the part of the definition, which states
10 "is not working in accordance with business rules to exchange
11 transactions with BellSouth." A defect to documentation or business rules
12 is a condition where the documentation or business rule does not agree or
13 accurately reflect the business environment. BellSouth is also working to
14 incorporate more of AT&T's suggested additions to the defect definition
15 regarding requirements defects.

16

17 **Q. HOW ARE DEFECTS HANDLED BY THE CCP AND BELLSOUTH?**

18

19 **A.**BellSouth is committed to responding to all requests in the manner set
20 forth in the CCP. A workaround will be provided, in most cases, no more
21 than (4) business days after validation of the existence of a defect. Since
22 BellSouth has incorporated this process, BellSouth has actually provided
23 workarounds within three (3) business days. BellSouth has also proposed
24 in its version of the CCP document to reduce workaround cycle times for
25 high-impact defects from four (4) days to two (2) days, while retaining the

1 four-day cycle for medium- and low-impact defects. BellSouth works
2 diligently to provide a response/workaround as quickly as possible. Defect
3 fixes, depending upon the system/customer impacts, are generally
4 implemented in point releases, which means a quicker turnaround for the
5 CLEC.

6

7 Q. WHAT DO YOU BELIEVE TO BE THE ISSUE HERE?

8

9 A. AT&T takes exception, evidently, to our definition of a defect. Hopefully,
10 this has been resolved.

11

12 Q. IS DEFINING A PROBLEM AS A DEFECT OR A NON-DEFECT
13 IMPORTANT?

14

15 A. Yes. If it is a defect, it gets the Category 3 treatment described earlier. If
16 it is just something AT&T doesn't like, but does not rise to the level of a
17 defect, it gets Category 2 treatment.

18

19 **g) AN EIGHT-STEP CYCLE, REPEATED MONTHLY**

20 Q. DOES BELLSOUTH UNDERSTAND WHAT IS AT ISSUE HERE?

21

22 A. Yes. As this issue has evolved, it is clearer that AT&T's issue is not with
23 the number of steps (as the issue title seems to imply), but more so with
24 cycle times contained within the steps, per direct testimony filed by AT&T
25 witness Jay M. Bradbury for similar arbitration before the Florida Public

1 Service Commission (FPSC Docket No. 000731-TP, page 63; excerpt
2 attached as Exhibit RMP-25). As discussed previously, AT&T has filed
3 suggested changes to the CCP document in the form of marked-up copies
4 of various versions of BellSouth's CCP Document. Included are AT&T's
5 recommendations for reduced cycle times for some of the steps AT&T
6 feels are necessary in order to meet its perceived business needs.

7
8 BellSouth provided feedback for the marked-up CCP Version 2.0 to AT&T
9 and the other member CLECs prior to the December 7, 2000 CCP
10 Monthly Status Meeting, and BellSouth's proposal for a reduction in cycle
11 times is also being considered by the CCP as part of the ongoing
12 collaborative effort. As stated earlier, there are some reduced cycle-time
13 intervals that BellSouth has been able to propose (e.g., two (2) days for
14 the development of a workaround for a high-impact defect), and some
15 reduced cycle-time intervals proposed by AT&T that BellSouth cannot
16 support (e.g., cutting the review cycle for a change request from 20 to 10
17 days).

18

19 ***h) A FIRM SCHEDULE FOR NOTIFICATIONS ASSOCIATED WITH***
20 ***CHANGES INITIATED BY BELL SOUTH***

21 Q. DOES THE CCP PROVIDE A "FIRM SCHEDULE" FOR NOTIFICATIONS
22 ASSOCIATED WITH BELLSOUTH-INITIATED CHANGES?

23

24 A. Yes. The schedule is outlined on page 20 of the CCP document (Exhibit
25 RMP-5), with a detailed description of the process flow for BellSouth-

1 initiated changes on pages 19-24. As previously noted, and in response
2 to CLEC requests, BellSouth has also proposed changes in the
3 notification process regarding user requirements for software releases (90
4 and 45 days advance notification for draft and final requirements,
5 respectively), new TCIF mapping (180 days advance notification for
6 implementation release date, and 120 and 60 days advance notification
7 for draft and final requirements, respectively), and retirement of interfaces
8 (120 days advance notification for the retirement of old versions of
9 interfaces).

10

11 Another change regarding notifications to which BellSouth has agreed is
12 related to documentation for non-system-affecting documentation. The
13 current CCP 2.0 document states that BellSouth will provide this
14 documentation a minimum of five (5) days in advance of the
15 implementation of a change related to the documentation, and that
16 system-affecting documentation will be provided a minimum of 30 days in
17 advance of the implementation. In response to CLEC requests, BellSouth
18 will now provide all documentation 30 days in advance. This agreement to
19 change is reflected in the minutes of the December 7, 2000 Process
20 Improvement Meeting minutes (Exhibit RMP-14).

21

22 Q. BECAUSE THE CCP CONTAINS A SCHEDULE FOR NOTIFICATIONS,
23 DOES BELLSOUTH UNDERSTAND WHY THIS IS AT ISSUE?

24

1 A. No. We conclude that AT&T is simply unhappy with the schedule
2 established through collaboration by CLECs and BellSouth operating
3 under change control, and that AT&T is attempting to circumvent the
4 collaborative nature of the process through this arbitration. If AT&T
5 wishes to make changes regarding the scheduling of notifications, it
6 should submit its proposed changes to the CCP. Indeed, that has been
7 done with regard to AT&T's issues – with resulting changes.

8
9 Q. IS BELLSOUTH COMMITTED TO USING THE CCP TO INITIATE
10 CHANGE REQUESTS?

11
12 A. Yes, of course. BellSouth is committed to using the process to initiate
13 change requests, and, in fact, has already submitted numerous change
14 requests. The Change Control log (available via the Change Control
15 Process website) shows that BellSouth has initiated numerous change
16 requests for various improvements to the ordering process, and has also
17 originated a number of change requests to correct various types of system
18 and documentation defects that BellSouth has discovered.

19
20 **i) A PROCESS FOR DISPUTE RESOLUTION INCLUDING REFERRAL TO**
21 **STATE UTILITY COMMISSIONS OR COURTS**

22 Q. DOES THE CCP INCLUDE DISPUTE RESOLUTION?

23
24 A. Yes. A dispute resolution process was established as part of the
25 expansion of the CCP, and a description is contained in the CCP

1 document on page 40. In brief summary, the process is as follows: In the
2 event that an issue is not resolved through the CCP's escalation process,
3 BellSouth and the affected CLEC (or CLECs) will form a Joint Investigative
4 Team of Subject Matter Experts within one week. The team will conduct a
5 root cause analysis to determine the source of the problem, and then
6 develop a plan to remedy it. Each party to the dispute must escalate the
7 issue within each company to the person with the authority to resolve the
8 issue.

9

10 Q. IF THE DISPUTE CANNOT BE RESOLVED AFTER ALL THESE STEPS,
11 THEN WHAT OPTIONS ARE AVAILABLE?

12

13 A. As stated in the CCP document (Exhibit RMP-5) on page 40, if the dispute
14 cannot be resolved after these steps, then either party may file a formal
15 complaint for binding mediation with the Director of Telecommunications,
16 or the appropriate state official. According to the CCP, the complaint
17 should be ruled upon within thirty (30) days of the filing, although we
18 obviously recognize that this is solely within the Commission's discretion.
19 If either party is then aggrieved, it may file a formal complaint with the
20 state public service commission. It should be noted that this language has
21 been introduced as part of the Interim CCP. We recognize, however, that
22 this language may require refinement in order to be appropriate for
23 Kentucky.

24

25

1 **j) A PROCESS FOR ESCALATION OF CHANGES IN PROCESS**

2 Q. DO YOU UNDERSTAND WHAT IS AT ISSUE HERE?

3

4 A. Yes. This is another example of how an issue can work toward resolution
5 through the collaborative CCP. At first, AT&T's concern here was the lack
6 of a well-defined escalation process. Through the CCP – and with AT&T's
7 involvement – such an escalation process has been developed, and an
8 overview of the process is presented below.

9

10 Although AT&T now agrees in concept with the escalation process, AT&T
11 has found yet another concern. In its marked-up CCP Version 2.0, AT&T
12 has recommended specific intervals for some of the steps to better
13 regulate – from AT&T's perspective – the attention given to escalations
14 based upon the severity of the impact of the issue. Appropriately, the
15 CCP is also reviewing AT&T's proposed intervals, while considering
16 BellSouth's proposed intervals.

17

18 BellSouth has proposed what it feels are reasonable time intervals for
19 each cycle of the escalation process, and they can be found on pages 58
20 and 62 of Exhibit RMP-19. In summary, BellSouth has proposed the
21 following:

- | | | |
|----|--------------------------------------|------------------|
| 22 | Type-1 issues: | 1-day turnaround |
| 23 | Types 2-5 issues: | 5-day turnaround |
| 24 | Type-6 High Impact issues: | 2-day turnaround |
| 25 | Type-6 Medium and Low Impact issues: | 5-day turnaround |

1 Types 4-5 Expedite Process issues: 3-day turnaround

2

3 Q. PLEASE DESCRIBE THE CCP'S ESCALATION PROCESS.

4

5 A. The guidelines for the escalation process are on page 33 of the CCP
6 document (Exhibit RMP-5). The CCP document provides as follows:

- 7 • The ability to escalate is left to the discretion of the CLEC based on
8 the severity of the missed or unaccepted response/resolution.
- 9 • Escalations can involve issues related to the Change Control
10 process itself.
- 11 • For change requests, the expectation is that escalation should
12 occur only after normal Change Control procedures (e.g.
13 communication timelines) have occurred per the Change Control
14 agreement.

15

16 The contacts and the processes for each type of change request are
17 located on pages 34-36. To summarize:

18 Type-1 change requests (System Outages) would be escalated
19 through three levels of the Electronic Communications Support
20 Group-Interconnection Operations by the CLEC.

21 Types-2-6 change requests would be escalated through the
22 Change Control Team who would direct Business Rules,
23 Operations Issues, and System Issues to the appropriate Director
24 within BellSouth.

25

1 **k) TESTING SUPPORT AND A TESTING ENVIRONMENT**

2 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S CONCERN
3 WITH THIS SUB-ISSUE?

4
5 A. BellSouth believes that AT&T would like to see all interface testing and
6 processes come under CCP control – including that which is related to
7 certification for new CLECs – and to ensure that CLECs have the ability to
8 test their own ordering capabilities in advance of the implementation of
9 new releases for BellSouth's interfaces.

10
11 Q. PLEASE RESPOND TO AT&T'S CONCERNS.

12
13 A. As AT&T is fully aware, there has been a major development effort
14 underway – again within the collaborative CCP – to establish the CLEC
15 Test Environment for just such purposes as mentioned in the previous
16 answer. The two most recent meetings were held on January 17 and 18,
17 2001, and the minutes from those meetings are included together as
18 Exhibit RMP-26. While there are still some minor action items (mostly
19 created by AT&T Witness Bradbury) to be handled, BellSouth has
20 targeted March 31, 2001 as the implementation for the CLEC Test
21 Environment.

22
23 Q. WHAT ARE SOME OF THE KEY POINTS ABOUT THE CLEC TEST
24 ENVIRONMENT THAT YOU WOULD LIKE TO HIGHLIGHT?

25

1 A. Probably the most important highlight is the fact that this is a joint effort of
2 the CLECs and BellSouth in determining which capabilities would be
3 incorporated into the scope of the test bed functionality. BellSouth is
4 currently installing software for this application on the hardware platforms,
5 and by the time the test bed is available for general CLEC use, BellSouth
6 and one CLEC will have already tested it.

7
8 Once the test bed is operational, CLEC use of the test bed will be
9 negotiated and scheduled based upon what the CLEC plans to test. The
10 overall process for CLEC testing will be defined in a CLEC test agreement
11 to ensure maximum utilization availability to the CLEC community as a
12 whole, and that the test bed capacity is not dominated by individual
13 CLECs. The test bed will also be the application used for testing initial
14 connectivity with new CLECs.

15
16 Testing schedules for both new and existing CLECs will be arranged
17 through the CCP.

18
19 ***I) PROVISION OF A TROUBLE NUMBER FOR TYPE-1 EVENTS***

20 Q. WHAT HAS BELLSOUTH PROPOSED WITHIN THE CCP TO HELP
21 MEET THIS REQUEST?

22
23 A. In the event that a CLEC and the BellSouth Electronic Communications
24 Support (“ECS”) helpdesk jointly agree that a particular Type-1 outage is
25 not industry-impacting (i.e., the outage is isolated to the one CLEC), the

1 ECS will provide the CLEC with a unique trouble ticket number – upon
2 request by the CLEC – to record and track the outage. The CLEC and
3 BellSouth will then work jointly to resolve the problem. For an industry-
4 impacting outage, the standard Type-1 outage process flow as defined in
5 the CCP would be followed.

6

7 **m) A PROCESS FOR THE CANCELLATION, REJECTION OR**
8 **RECLASSIFICATION OF A CLEC CHANGE REQUEST**

9 Q. WHAT IS BELLSOUTH’S UNDERSTANDING OF AT&T’S CONCERN
10 WITH THIS SUB-ISSUE?

11

12 A. From its language in testimony from similar proceedings in another state,
13 AT&T apparently feels that the current wording of the CCP document
14 gives BellSouth an unreasonable “up-front veto power over any change
15 request submitted by CLECs,” and that change requests “should not be
16 subject to the arbitrary cancellation or rejection by BellSouth.”

17

18 Q. PLEASE RESPOND TO THAT CONCERN.

19

20 A. Despite AT&T's feelings about the wording in the current CCP document,
21 BellSouth would argue strongly that it has never acted irresponsibly upon
22 CLEC change requests in the manner that AT&T implies it might, nor
23 would BellSouth do so in the future if the wording remains as it is. AT&T
24 has offered its proposed changes to this section of the CCP, and, for the
25 most part, BellSouth is receptive to them.

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Q. WHAT HAS BELLSOUTH PROPOSED IN REGARD TO THIS ISSUE?

A. BellSouth has stated in its proposed changes to the CCP (Page 40 of Exhibit RMP-19) that, if BellSouth determines that a CLEC-initiated change request should not be accepted because of cost, industry direction or technical feasibility issues, BellSouth will open an agenda item for the next monthly status meeting/call, and will provide a subject matter expert to present the BellSouth case at the next monthly status meeting. BellSouth has also stated that the subject matter expert should be given at least a two-week notification prior to the meeting. BellSouth further commits to consider all possible options for accommodating the request. This wording closely aligns with AT&T's proposed changes. Moreover, I would note that under the CCP, if there is a disagreement between BellSouth and a group of CLECs (but not just a single CLEC) there are escalation processes that allow for the resolution of such disputes.

n) A PROCESS FOR PRIORITIZATION AND ASSIGNMENT OF CHANGE REQUESTS TO FUTURE RELEASES FOR IMPLEMENTATION

Q. WHAT IS BELLSOUTH'S UNDERSTANDING ABOUT AT&T'S CONCERN WITH THIS SUB-ISSUE?

A. Again, from testimony from similar proceedings in another state, AT&T apparently is unhappy with what it perceives as "an arbitrary release schedule developed without input from the affected CLECs or the CCP."

1 AT&T suggests that its proposed wording “establishes fixed points for
2 prioritization meetings, and requires all prioritized change requests to be
3 assigned to specific future releases.” AT&T does go on to say that there
4 is some flexibility in its proposed process, since CCP consensus at a
5 Release Package Meeting might, in fact, change the order of priority.

6

7 Q. DOES BELLSOUTH HAVE A DIFFERING OPINION ABOUT HOW THE
8 PRIORITIZATION AND ASSIGNMENT OF CHANGE REQUESTS
9 SHOULD BE ACCOMPLISHED?

10

11 A. While releases may not be on a regularly-scheduled basis, I would hardly
12 term them “arbitrary”, nor will I agree that there have not been inputs from
13 the CLECs or the CCP. I do think it is fair to say that fundamentally
14 BellSouth and AT&T both have the same end goal in mind for this issue.
15 BellSouth has agreed to many of AT&T's proposed changes, including the
16 set schedule of quarterly prioritization meetings, providing size and scope
17 information on pending change requests to the CLECs, and a number of
18 wording changes for clarity purposes. It simply comes down to how often
19 reprioritization of the change requests can occur, and whether BellSouth
20 can accommodate as many priority items in a release package as AT&T
21 feels BellSouth should be able to do. This remains an open issue.

22

23 o) **A PROCESS FOR CHANGING THE PROCESS**

24 Q. DOES THE CURRENT VERSION OF THE CCP DOCUMENT ADDRESS
25 A PROCESS FOR CHANGES TO THE PROCESS?

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25

A. Yes. Section 9.0 of the current Version 2.0 of the CCP document specifies that requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (“BCCM”) for review by the CCP, using the Change Request form located in Appendix A of the CCP document. CCP process change requests are reviewed at the monthly Change Review meetings.

Q. ARE THERE CURRENTLY ANY PROPOSED CHANGES TO THE PROCESS UNDER CONSIDERATION BY THE CCP?

A. Again, yes. As previously discussed, AT&T itself submitted a CCP Change Request (Log # CR0171 – September 9, 2000) under the provisions of Section 9.0 of the current CCP document. That request led to the formation of a CLEC subcommittee that has recommended a vast number of changes to the process, including changes to Section 9.0. The aforementioned “marked-up version” of CCP 2.0 has been presented to the CCP, and, as discussed earlier, BellSouth also provided its own proposed changes (Exhibit RMP-19) in response to and in conjunction with those of the CLECs. When agreement is reached within the CCP as to which proposed changes will occur, the current CCP Version 2.0 will be updated accordingly and posted to the CCP web site. As discussed previously in my testimony, a major update incorporating a number of AT&T/CLEC requested changes is about to take place and the new document will be posted on or about February 9, 2001. Further, any

1 unresolved or open issues will continue to be discussed within the same
2 ongoing process, and changes resulting from those discussions will be
3 similarly updated to the CCP document.

4

5 Q. WHAT DOES BELLSOUTH WANT THE COMMISSION TO DO TO
6 RESOLVE THE VARIOUS PARTS OF ISSUE 22 THAT HAVE BEEN
7 PRESENTED?

8

9 A. First, BellSouth believes that the Commission should do nothing, finding
10 that the CCP should be handled collaboratively between the CLECs and
11 BellSouth. Second, if the Commission wants to address any particular
12 part of the CCP, BellSouth requests that the Commission simply make
13 recommendations rather than impose requirements on the process that
14 will affect a number of CLECs other than AT&T. If, however, the
15 Commission wants to address each individual dispute between BellSouth
16 and AT&T, BellSouth suggests that the simplest way to do this is to simply
17 compare AT&T's marked-up copy of Version 2.0 of the CCP to BellSouth's
18 marked-up copy of that same version. The dispute between the parties is
19 clearly illustrated in those documents. Based on the evidence provided,
20 the Commission should be able to determine which party's language
21 would be most appropriate, thus facilitating a resolution of this issue.
22 Also, the Commission can consider the host of changes recently accepted
23 via the Change Control process as proof that change management can
24 work within the collaborative process currently utilized by BellSouth and
25 the CLECs.

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

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. As stated earlier, BellSouth's position is that the CCP, and, therefore, any issues pending before the CCP, are not appropriate for this arbitration. All requests for enhancements to BellSouth's electronic and manual interfaces should be submitted via the CCP. As I stated in Issue 22 above, the CCP is a collaborative process established between BellSouth and interested CLECs to manage changes to interfaces. OSS issues submitted to the CCP must be dealt with by BellSouth and all of the CLECs participating in CCP, not just BellSouth and AT&T. Moreover, should the Commission decide to consider these topics, BellSouth requests that the Commission only gives guidance on these issues, rather than requiring a result that may be in conflict with a decision in another state.

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON THIS ISSUE?

1 A. As BellSouth understands AT&T's position, AT&T is attempting to
2 circumvent the CCP for the issues described in Issue 22. This would allow
3 AT&T to gain an unfair advantage over the other CLECs that adhere to the
4 regional CCP.

5

6 Q. WILL BELLSOUTH PROVIDE THE STATUS OF EACH REQUEST
7 LISTED IN ISSUE 23, EVEN THOUGH THE ISSUE IS NOT
8 APPROPRIATE FOR THIS ARBITRATION?

9

10 A. Yes. Although we do not think it appropriate to resolve in this proceeding,
11 I will address each item AT&T included in its position statement. AT&T
12 divided this issue into sub-parts (a) - (c). I will address each of the listed
13 items in the same manner.

14

15 **Sub-part (a) Parsed Customer Service Records ("CSR") for Pre-ordering**

16 Q. WHAT DOES "PARSE" MEAN?

17

18 A. To parse means to receive a stream of data from the Customer Service
19 Record ("CSR") and break down that data into certain fields for further
20 use.

21

22 Q. WHAT HAS THE FCC SAID ABOUT AT&T's INTERPRETATION OF THE
23 BELL ATLANTIC ORDER AS IT RELATES TO PARSING?

24

1 A. In its Southwestern Bell Texas order, footnote 413, the FCC stated that
2 “Contrary to AT&T’s interpretation of the *Bell Atlantic New York Order*, see
3 AT&T Texas I Dalton/DeYoung Decl. At para. 95, we have not previously
4 stated that a BOC must perform parsing on its side of the interface.”
5

6 Q. WHAT IS BELLSOUTH’S UNDERSTANDING OF WHAT AT&T REFERS
7 TO AS A PARSED CSR?
8

9 A. Based on BellSouth’s understanding, AT&T is referring to the level to
10 which the CSR information is provided for parsing in the TAG pre-ordering
11 interface. AT&T wants “sub-line” parsing of the CSR data to a level that
12 goes beyond the level used and retained by BellSouth for itself. BellSouth
13 currently provides the CLECs a stream of data via the machine-to-
14 machine TAG pre-ordering interface based on the Common Object
15 Request Broker Architecture (“CORBA”) industry standard. The stream of
16 data is identified by section with each line uniquely identified and
17 delimited. This data is provided to CLECs in the same manner as it is to
18 BellSouth’s Retail units.
19

20 BellSouth, for example, retains the customer’s listed name as a complete
21 field - my listed name is “Pate, Ronald M”. AT&T apparently wants “sub-
22 line” parsing of “Pate, Ronald M” into three separate fields: last name
23 (“Pate”), first name (“Ronald”), and middle initial (“M.”). This level of
24 parsing can be programmed by AT&T on its side of the interface. The
25 bottom line is that BellSouth provides CLECs with the CSR information in

1 a nondiscriminatory format. BellSouth, therefore, has met its obligations
2 regarding parsing.

3

4 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
5 SUB-PART A OF THIS ISSUE?

6

7 A. In its petition and exhibits, AT&T claims that BellSouth should provide a
8 parsed CSR pursuant to industry standards. AT&T further claims the
9 parsed CSR has been an industry standard since the publication of the
10 Local Service Ordering Guidelines Issue 3 ("LSOG 3"), thus suggesting
11 that we should have already implemented what AT&T is requesting.

12

13 Q. DEFINE 'LSOG', AND EXPLAIN BELLSOUTH'S POSITION REGARDING
14 LSOG.

15

16 A. LSOG, or Local Service Ordering Guidelines, is the set of guidelines for
17 CLECs to use when ordering local service. The guidelines were originally
18 established in accordance with the consensus approval of the OBF.
19 BellSouth readily adopted – and has fully supported – the OBF
20 recommendations with few exceptions regarding conflicts with BellSouth's
21 legacy systems or established processes. BellSouth currently supports
22 LSOG Version 4 forms for manual ordering.

23

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

25

1 A. As explained in detail below, BellSouth provides CLECs the CSR data in
2 the same manner that it provides the data to itself for use by the BellSouth
3 retail units.

4
5 Q. HAVE THE CLEC ELECTRONIC INTERFACES BEEN UPGRADED TO
6 LSOG 4?

7
8 A. Yes. The interfaces were upgraded from the Telecommunications
9 Industry Forum Issue 7 ("TCIF7") to TCIF Issue 9 ("TCIF9") and parts of
10 TCIF Issue 10 in January 2000 when OSS99, which is based on LSOG 4,
11 was implemented. The OSS99 enhancement consists of the "best of"
12 TCIF Issue 8, TCIF Issue 9 and TCIF Issue 10, as selected by the CLECs
13 participating in the EICCP and BellSouth. Approximately two years ago,
14 BellSouth conducted meetings with the CLECs via the EICCP to discuss
15 the impact of moving from TCIF7 to TCIF9 (LSOG 4). Because of the
16 major efforts required to upgrade from TCIF7 to TCIF9, a decision was
17 made by the members of the EICCP, which included AT&T, to implement
18 the components that were most critical to the CLECs. The subparsed
19 CSR requested by AT&T was not included in this enhancement.

20
21 Q. HAS A CHANGE REQUEST FOR PARSED CSRS BEEN SUBMITTED
22 TO THE CCP?

23

1 A. Yes. AT&T submitted a Change Request, Log # TAG0812990003, on
2 August 12, 1999, requesting that BellSouth deliver a parsed CSR as part
3 of the pre-ordering functionality.

4
5 Q. WHAT IS THE STATUS OF THIS CHANGE REQUEST?

6
7 A. AT&T's Change Request was presented during the September 28, 1999
8 CCP Enhancement Review Meeting and prioritized as one of eleven
9 pending change requests to be considered for implementation in 2000.
10 During the November 30, 1999 CCP Release Planning Meeting, this
11 Change Request was updated for planning and analysis to begin in mid-
12 2000. This pending change request was reviewed during the March 29,
13 2000 CCP Monthly Status Call and it was decided a sub-team would be
14 formed during 2000 to investigate the implementation of sub-parsed CSR.
15 This change request was prioritized as the number one pre-ordering
16 request during the June 28, 2000 Change Review Meeting.

17
18 The sub-team has been formed; and it includes representatives from
19 BellSouth and the CLEC CCP participants. The initial Parsed CSR team
20 meeting was conducted on October 3, 2000, and subsequent sub-team
21 meetings were held on October 19, 2000 and November 16, 2000. The
22 September 28, 1999 meeting minutes are included as Exhibit RMP-27; the
23 minutes from the March 29, 2000 call are Exhibit RMP-28; the minutes
24 from October 3, 2000 meeting are Exhibit RMP-29; the minutes from the

1 October 19, 2000 meeting are Exhibit RMP-30; and the minutes from the
2 November 16, 2000 meeting are RMP-31.

3
4 On December 12, 2000, an e-mail was sent to participating CCP CLECs,
5 asking for comments on the work done by the sub-team after the
6 November 16 meeting. Attached to the e-mail were the following
7 documents: an updated Change Request, the November 16 Sub-Team
8 Meeting minutes, the Parsed CSR Action Item Log, CLEC User
9 Requirements, and a tentative Parsed CSR Implementation Timeline.
10 Comments were due by January 10, 2001, and a conference call sub-
11 team meeting was scheduled for mid-January 2001 to review the project
12 and the timeline.

13

14 Q. WHAT WERE THE RESULTS OF THAT JANUARY 2001 SUB-TEAM
15 MEETING CONFERENCE CALL?

16

17 A. The conference call was held on January 18, 2001, and the minutes and
18 updated change request from that call are included together as Exhibit
19 RMP-32. The tentative timeline for the implementation process was
20 discussed, and it reflected a target implementation date of December 31,
21 2001. BellSouth said it was working to improve upon that date – as well
22 as other interim dates – and anticipated being able to confirm a new
23 implementation date within two weeks of the conference call. On
24 February 1, 2001, the CLECs were notified via the CCP notification
25 process that the target implementation date had been improved to the

1 summer 2001 timeframe, and that a firm date and implementation timeline
2 would be forthcoming during February.

3
4 BellSouth is reviewing the User Requirements for accuracy and
5 completeness, and a joint review of the Requirements with the CLECs will
6 be held in February 2001. The User Requirements document is included
7 as Exhibit RMP-33. BellSouth is also developing a data map for the
8 parsed fields, and that will also be shared with the CLECs in February.

9
10 I would note that while the time frames mentioned throughout this
11 discussion of parsing might seem lengthy, it is the CLECs that prioritize
12 the changes that are addressed and implemented. The time frames that
13 have resulted are the consequence of the CLECs themselves placing
14 more important or critical changes ahead of the change request for
15 parsing, particularly with regard to the OSS99 release where other
16 changes were made.

17

18 Q. EXPLAIN HOW THE CLECS CAN PARSE THE CSR VIA TAG.

19

20 A. The TAG pre-ordering interface can be integrated with the TAG ordering
21 interface or the Electronic Data Interexchange ("EDI") ordering interface.
22 The CSR data that is delivered to the CLEC via TAG can be further
23 parsed by the CLEC to exactly the level needed on an order, just as
24 BellSouth parses CSRs in its own retail operations.

25

1 Q IF THE CLEC INTEGRATES THE TAG PRE-ORDERING INTERFACE
2 WITH ITS TAG OR EDI ORDERING INTERFACE AND WITH ITS OSS,
3 WILL THE CSR INFORMATION OBTAINED VIA TAG "FLOW INTO" ITS
4 OWN OSS?

5
6 A. Yes, that is the purpose of integratable, machine-to-machine interfaces.
7 CLECs, such as AT&T, can integrate the TAG pre-ordering interface with
8 the TAG ordering interface or the EDI ordering interface. CLECs can
9 integrate these interfaces with their own internal OSS. Integration allows
10 the CLECs the ability to manipulate the data obtained via the TAG pre-
11 ordering interface. This includes the ability to further parse the CSR. The
12 data can be manipulated so that it will "flow into" a CLEC's OSS.

13
14 Q. DOES AT&T NEED A PARSED CSR TO INTEGRATE ITS OWN
15 SYSTEMS WITH BELLSOUTH'S?

16
17 A. No. As I explained previously, BellSouth provides CLECs the ability to
18 parse information on the CSR, using the integratable machine-to-machine
19 TAG pre-ordering interface. The TAG gateway transmits the CSR
20 information as a stream of data, which a CLEC can parse to the same line
21 level using the same unique section identifiers and delimiters that
22 BellSouth does for itself. Furthermore, BellSouth does provide "sub-line"
23 parsing of the end user's address during the address validation process in
24 TAG. Thus, TAG allows CLECs to parse CSRs in the same way that
25 BellSouth Retail systems parse CSRs, and AT&T needs nothing further.

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Sub-part (b) Electronic Ordering of All Services and Elements

Q. BEFORE ADDRESSING SUB-PART B, WILL YOU PROVIDE A DEFINITION OF THE MANUAL SUBMISSION AND ELECTRONIC SUBMISSION WITH SUBSEQUENT MANUAL HANDLING METHODS OF SUBMITTING LSRS?

A. Yes. Manual submission refers to the manual or non-electronic submission of LSRS. Manual submission of LSRS can be accomplished by facsimile. The manual submission is a result of the fact that the services ordered require substantial manual handling and cannot be submitted electronically. Alternatively, some CLECs may simply choose not to utilize BellSouth’s electronic interfaces, even though the request may be submitted electronically.

Electronic processing with subsequent manual handling means the LSRS may be submitted electronically by the CLEC but the requested service orders are designed to “fall out” for manual handling by the LCSC. This “fall out” results from the fact that the requested services are complex or for other specified reasons, such as a request to expedite the order. After these LSRS are transmitted to BellSouth via the electronic interface, they are handled as if they were faxed, couriered or mailed to the LCSC. I will discuss each method of submission in detail later in my responses to sub-parts (b) and (c).

1 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
2 SUB-PART B OF THIS ISSUE?

3

4 A. As BellSouth understands AT&T's position, AT&T is asking that BellSouth
5 provide it the ability to submit "all" LSRs electronically.

6

7 Q. WHAT IS BELLSOUTH'S POSITION ON SUB-PART B OF THIS ISSUE?

8

9 A. BellSouth's position is that nondiscriminatory access does not require that
10 all LSRs be submitted electronically and involve no manual processes.

11 BellSouth's own retail processes often involve manual processes, as I will
12 describe below, and therefore there is no requirement that every LSR has
13 to be submitted electronically in order to provide nondiscriminatory
14 access.

15

16 However, before I discuss this issue any further, I want to state again that
17 all change requests for BellSouth's electronic and manual interfaces
18 should be submitted via the CCP. OSS issues subject to the CCP are not
19 appropriate for this arbitration. These issues must be dealt with by
20 BellSouth and all of the CLECs participating in the CCP, not just by AT&T
21 and BellSouth in an arbitration such as this one.

22

23 Q. BY THE WAY, HAS A CHANGE REQUEST BEEN SUBMITTED VIA THE
24 CCP FOR THIS ELECTRONIC SUBMISSION OF ALL LSRS?

25

1 A. To BellSouth's knowledge, no such a change request has been submitted
2 to the CCP.

3

4 Q. CAN YOU ELABORATE ON YOUR EARLIER REMARK THAT
5 NONDISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL
6 LSRS BE SUBMITTED ELECTRONICALLY?

7

8 A. Yes. As I stated in my position, nondiscriminatory access does not require
9 that all LSRS be submitted electronically. Many of BellSouth's retail
10 services, primarily complex services, involve substantial manual handling
11 by BellSouth account teams for BellSouth's own retail customers.
12 Nondiscriminatory access to certain functions for CLECs legitimately may
13 involve manual processes for these same functions. Therefore, these
14 processes are in compliance with the Act and the FCC's rules.

15

16 Q. PLEASE DESCRIBE HOW BELLSOUTH'S COMPLEX SERVICE
17 REQUESTS ARE MANUALLY HANDLED FOR BELLSOUTH AND
18 CLECS.

19

20 A. There are two types of complex services: "Non-designed" and "Designed."
21 A "Non-designed" service is a class of service with a Universal Service
22 Order Code ("USOC") that does not require special provisioning and is
23 served by one central office or wire center. A "Designed" service involves
24 special engineering and provisioning.

25

1 An example of a “Designed” complex service for which retail handling is
2 not fully mechanized is Multiserv® service. This is a complex service
3 available to both BellSouth's retail customers and to resellers. In the case
4 of MultiServ®, the pre-ordering processes are largely manual. These
5 manual pre-ordering processes are substantially the same for both retail
6 and CLEC orders. Orders for retail services are handled primarily by the
7 appropriate business unit for retail services -- BellSouth Business Systems
8 (“BBS”) account teams. Orders for CLEC services are handled by the
9 appropriate business unit for CLEC services – CLEC account teams that
10 are part of Interconnection Services (“ICS”). The ICS account team's
11 handling of complex services for CLECs is substantially the same as
12 BBS’s account team handling of complex services for BellSouth’s retail
13 customers; they both use substantially the same processes as described
14 below.

15
16 Attached to my testimony is Exhibit RMP-34, which depicts the flow of the
17 process for ordering MultiServ® service by CLECs and Exhibit RMP-35,
18 which depicts the flow of the process for ordering MultiServ® by
19 BellSouth's retail unit. To perform the pre-ordering activity for complex
20 services, which is known as a “service inquiry”, a systems designer on the
21 appropriate BBS or ICS account team fills out an extensive paper form
22 and then provides that form to a project manager for further manual
23 activities. On approval of either the retail customer or the CLEC, as
24 appropriate, the paper service inquiry is re-initiated as a firm order, which
25 also is an extensive paper form with subsequent manual distribution. In

1 both the retail and the resale cases, the Firm Order Package is manually
2 handed off to the service center, where paper service order worksheets
3 are created to assist in initiating service orders in the ordering system. At
4 that point, orders are typed into the appropriate order systems – ROS for
5 the BellSouth Retail order and DOE for the CLEC order. The order entry
6 is handled in substantially the same manner for both the retail and the
7 resale situations, and thus, does not result in a different customer
8 “experience” in either case. The person who enters the complex order in
9 BellSouth's systems never has any contact with the end-user customer,
10 whether the customer belongs to a CLEC or BellSouth. After the service
11 order is input, the account team and project manager are notified by e-
12 mail of the service order numbers and due dates. The account team
13 manually reviews the service order for accuracy and follows up as
14 necessary. These processes, with their substantial reliance on manual
15 handling and paper forms, are common to both retail and CLEC orders.
16 Thus, BellSouth provides to CLECs the ability to order complex services in
17 substantially the same time and manner as it provides to its retail
18 customers.

19

20 Q. PLEASE DESCRIBE THE EDITING AND FORMATTING FUNCTIONS
21 CONTAINED IN THE SERVICE ORDER INTERFACES USED BY
22 BELL SOUTH'S CONSUMER SERVICES RETAIL UNIT.

23

24 A. RNS is the primary interface used by BellSouth's Consumer Services
25 retail unit. The presentation layer of RNS interfaces with the process layer

1 and several databases to create service requests. Two of the databases,
2 with which the presentation layer of RNS interfaces, are the Service Order
3 Language Analysis Routine (“SOLAR”) and the FID USOC Editing Library
4 (“FUEL”). FUEL contains rules associated with service request generation
5 and a table for the translations of USOCs and FIDs to English. Those
6 rules include a copy of the Service Order Edit Routine (“SOER”) service
7 order edits applicable to orders issued through RNS and mirror edits
8 applied within the Service Order Communications System (“SOCS”).
9 SOLAR uses these rules in FUEL to construct and generate service
10 request with minimal errors.

11

12 Q. CAN AT&T AND OTHER CLECS PROVIDE THESE SAME EDITING AND
13 FORMATTING FUNCTIONS FOR THEIR INTERFACE OF CHOICE?

14

15 A. Yes. AT&T can build the same editing and formatting functions on its side
16 of the interface using information supplied by BellSouth. BellSouth
17 business rules for pre-ordering are contained in the BellSouth Pre-Order
18 Business Rules, the BellSouth Pre-Order Business Rules Appendix, and
19 the BellSouth Pre-Order Business Rules Data Dictionary. BellSouth's
20 business rules for placing electronic and manual LSRs are contained in
21 the BellSouth Business Rules for Local Ordering document. The business
22 rules for the SOER edits are contained in these guides on the BellSouth
23 Interconnection website:

24 <http://www.interconnection.bellsouth.com/guides/guides-p.html>.

25

1 A CLEC such as AT&T can use this information to program the electronic
2 interfaces on their side of the gateway to perform the exact same
3 functionality performed by SOLAR/FUEL to ensure LSR submissions with
4 minimal errors. The availability of the information to the CLEC also gives
5 the CLEC the ability to customize their application for those SOER edits
6 that are unique to the services being ordered based on their business
7 plan. For those not desiring to make such an investment, most all of the
8 SOER edits are applied in LESOG. If an LSR does not "pass" LESOG's
9 checks, the LSR will be sent back instantly electronically to the CLEC for
10 clarification ("auto-clarified") for the most common CLEC-caused errors.

11

12 **Sub-part (c) Electronic Processing after Electronic Ordering without**

13 **Subsequent Manual Processing by BellSouth Personnel**

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

16

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

20

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

22

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

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Q. WHAT IS FLOW-THROUGH?

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

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

A. No. To BellSouth's knowledge, no such change request has been submitted to the CCP. As I have discussed previously, BellSouth's position is OSS issues subject to the CCP are not appropriate for this arbitration. AT&T is attempting to avoid the CCP. All requests for enhancements to BellSouth's electronic and manual interfaces should be submitted via the CCP.

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

1 A. No. As I discussed in sub-part (B), many of BellSouth's retail services,
2 primarily complex services, involve substantial manual handling by
3 BellSouth account teams for BellSouth's own retail customers. The orders
4 at issue here are those that the CLEC may submit electronically, but fall
5 out by design. In most cases these orders are complex orders. For
6 certain orders, BellSouth has, for the ease of the CLEC, allowed them to
7 be submitted electronically even though such orders are then manually
8 processed by BellSouth. The specialized and complicated nature of
9 complex services, together with their relatively low volume of orders as
10 compared to basic exchange services, renders them less suitable for
11 mechanization, whether for retail or resale applications. Complex variable
12 processes are difficult to mechanize, and BellSouth has concluded that
13 mechanizing many lower-volume complex retail services would be
14 imprudent for its own retail operations, in that the benefits of
15 mechanization would not justify the cost. Because the same manual
16 processes are in place for both CLEC and BellSouth retail orders, the
17 processes are competitively neutral, which is exactly what both the Act
18 and the FCC require.

19

20 Q. WHAT ARE THE REASONS THAT ELECTRONICALLY SUBMITTED
21 ORDERS FALL OUT FOR MANUAL HANDLING?

22

23 A. There are two main reasons that electronically submitted orders fall out for
24 manual handling. The first reason is that the Local Exchange Service
25 Order Generator ("LESOG") has not been programmed to handle requests

1 for certain types of products and services, typically complex services.
2 Another example might be the inability to justify the economics of
3 programming for some types of low ordering volume products and
4 services.

5
6 The second reason for fallout concerns unique circumstances related to
7 the LSR. Requests with pricing plans specific to the CLEC, requests
8 which have other related requests being processed, and subsequent
9 requests on an account prior to the new telephone number being posted
10 to the billing system are all examples of LSRs that are subject to fallout
11 due to unique circumstances.

12

13 Q. DOES THE FCC REQUIRE THAT ALL LSRs BE SUBMITTED
14 ELECTRONICALLY WITHOUT MANUAL INTERVENTION?

15

16 A. No. Nondiscriminatory access does not require that all LSRs be submitted
17 electronically, and, further, the FCC doesn't require that all electronically
18 submitted LSRs have to flow through without manual intervention. In its
19 approval of in-region interLATA services for both Southwestern Bell
20 Telephone Company for Texas (paragraph 180) and Bell Atlantic for New
21 York (footnote 488), the FCC recognized that some services could
22 properly be designed to fall out for manual processing.

23

24 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 23.

25

1 A. I will summarize Issue 23 as follows:

2 1) Issue 23 is not appropriate for this arbitration.

3 2) A Change Request is pending in the CCP for a subparsed CSR.

4 This is an active element before the CCP and will be resolved
5 there.

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

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

13

14

15 ***Issue 24: Should BellSouth provide AT&T with the ability to access, via***

16 ***EBI/ECTA, the full functionality available to BellSouth from TAFI and***

17 ***WFA?***

18

19 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
20 THIS ISSUE?

21

22 A. AT&T states that it wants BellSouth to make the Trouble Analysis and
23 Facilitation Interface ("TAFI") functionality available in the industry
24 standard Electronic Communications Trouble Administration ("ECTA")
25 Gateway interface. What I believe AT&T really wants is an integratable

1 interface with all of the functionality currently available in TAFI. In other
2 words, AT&T wants its representatives to be able to input a trouble report,
3 receive the trouble screening and status and at the same time have the
4 trouble information populate AT&T's internal backend OSS systems. In
5 actuality, AT&T wants an entirely new non-industry standard machine-to-
6 machine maintenance and repair interface. TAFI is a human-to-machine
7 interface, while ECTA is a machine-to-machine interface.

8

9 Q. WHAT IS BELLSOUTH'S POSITION?

10

11 A. BellSouth currently provides CLECs with nondiscriminatory access to its
12 maintenance and repair OSS functions through the TAFI and the ECTA
13 Gateway, and therefore meets its obligations under the Act and the FCC
14 Rules.

15

16 Q. PLEASE DESCRIBE HOW THESE INTERFACES PROVIDE
17 NONDISCRIMINATORY ACCESS.

18

19 A. The following chart demonstrates that CLECs have the same access to
20 BellSouth's maintenance and repair OSS that BellSouth has for itself.

BellSouth Retail Interfaces	Repair & Maintenance Functions	Interfaces offered to CLECs
Residential TAFI Business TAFI	Full repair & maintenance functionality for telephone number-based (non-designed circuit) services	CLEC TAFI
	Industry standard functionality for telephone number-based (non-designed circuit) services (T1/M1 local)	ECTA Local*
WFA-C	Repair & maintenance functionality for designed circuit services (access to WFA system)	ECTA Local*

1 *BellSouth offers the EC-CPM human-to-machine interface to CLECs that
2 do not wish to build a machine-to-machine interface.

3

4 Q. IN ITS RECENT ORDER APPROVING BELL ATLANTIC NEW YORK'S
5 APPLICATION FOR LONG DISTANCE, WHAT DID THE FCC
6 DETERMINE REGARDING BELL ATLANTIC'S MAINTENANCE AND
7 REPAIR INTERFACE?

8

9 A. In paragraph 215 of its Memorandum Opinion and Order CC Docket No.
10 99-295 released on December 22, 1999 ("Bell Atlantic Order"), the FCC
11 stated that it specifically disagreed with "AT&T's assertion that Bell Atlantic
12 must demonstrate that it provides an integratable, application-to-
13 application interface for maintenance and repair." The FCC further found
14 that, although it did not offer a machine-to-machine maintenance and
15 repair interface when it filed, "Bell Atlantic satisfie[d] its checklist obligation
16 by demonstrating that it offers competitors substantially the same means

1 of accessing maintenance and repair functions as Bell Atlantic's retail
2 operations." Bell Atlantic accomplished this by providing CLECs with a
3 Web-based GUI. BellSouth accomplishes this by providing TAFI and
4 ECTA to CLECs. As shown above and described below, BellSouth
5 provides CLECs with electronic access to its maintenance and repair OSS
6 in a manner that far exceeds what is provided by the Web-based graphical
7 user interface ("GUI") that Bell Atlantic had in place when it was approved
8 by the FCC.

9

10 Q. PLEASE DESCRIBE THE ECTA INTERFACE.

11

12 A. ECTA uses the T1/M1 national standard for local exchange trouble
13 reporting and notification. This machine-to-machine interface provides
14 access to BellSouth's maintenance OSS supporting both telephone-
15 number and circuit-identified services - i.e., designed and non-designed
16 services. It supports both resold services and UNEs. Following the
17 industry standard for local exchange trouble reporting and notification, the
18 following functions are available to users of ECTA:

19

- the ability to enter a report;
- the ability to modify a report;
- the ability to obtain status information during the life of the
22 report; and
- the ability to cancel a report.

20

21

22

23

24

25 Q. PLEASE DESCRIBE BRIEFLY THE STANDARDS USED FOR ECTA.

1

2 A. ECTA is built on the ANSI standards T1.227, T1.228 and T1.262. These
3 standards were defined by the Electronic Communications Implementation
4 Committee ("ECIC"), a subcommittee of the Alliance for
5 Telecommunications Solutions ("ATIS") – the primary body addressing
6 industry standards and guidelines in these areas, for the exchange of
7 maintenance and repair data. The ANSI standards upon which ECTA is
8 built do not support gathering all of the various data elements requested
9 by AT&T nor do they support the real time interactive human-to-machine
10 interface necessary to deliver true "TAFI" functionality.

11

12 Q. IS AT&T A CURRENT USER OF ECTA?

13

14 A. No. AT&T Local (the CLEC) initiated production utilization of the
15 BellSouth ECTA interface on March 18, 1998. On April 9, 1998 AT&T
16 Local terminated the use of this interface. Furthermore, AT&T has
17 declined to participate in the Florida OSS Third Party Testing for ECTA.

18

19 Q. PLEASE DESCRIBE THE TAFI INTERFACE.

20

21 A. CLEC TAFI is a user-friendly, real time human-to-machine repair and
22 maintenance interface that often enables trouble reports for non-designed
23 services to be cleared by the repair attendant handling the initial customer
24 contact, frequently with the customer still on the line. Since the CLEC
25 TAFI interface was introduced to CLECs in March 1997, CLEC TAFI has

1 had exactly the same functionality as the TAFI residential interface or the
2 TAFI business interface used by BellSouth. All upgrades to the two
3 BellSouth TAFI interfaces and CLEC TAFI interface have occurred in
4 parallel.

5
6 CLEC TAFI combines functionality for both residential and business
7 services, while BellSouth must use separate TAFI interfaces for its
8 residential and business retail units. TAFI was designed by BellSouth to
9 improve customer service by mechanically performing the traditional
10 screening function, and in many cases actually resolving the reported
11 trouble condition, while the customer remained on the line. This is possible
12 because TAFI correctly screens 80% of the reports for non-designed
13 services while the customer is on the line.

14

15 Q. WHAT ARE THE MAIN DIFFERENCES BETWEEN TAFI AND ECTA, AS
16 EACH PRESENTLY EXISTS?

17

18 A. The first difference, as previously discussed, is TAFI is a human-to-
19 machine interface and as such is not integratable, as opposed to the
20 machine-to-machine ECTA. While TAFI is a human-to-machine interface,
21 TAFI is the front-end system to the Loop Maintenance Operations System
22 (“LMOS”). LMOS provides a mechanized means for maintaining customer
23 line records and for entering, processing and tracking trouble reports. In
24 addition, TAFI interfaces with various BellSouth back-end legacy systems
25 as part of gathering the relevant information for trouble screening and

1 provides a recommendation/resolution to the problem condition. As for
2 ECTA, the entered trouble ticket is mechanically routed to LMOS;
3 however, the automated trouble ticket screening functionality is not
4 provided. While it can be said that TAFI is integratable (interfaces) with
5 BellSouth's back-end legacy systems, TAFI is not integrated with
6 BellSouth's marketing and sales support systems, RNS and ROS. As the
7 front-end system to LMOS, TAFI provides access to information about the
8 trouble reports of CLECs' end users just as it does for BellSouth's end
9 users. BellSouth, therefore, provides TAFI to CLECs as it does for itself.
10 If a CLEC wishes to populate its own maintenance and repair databases
11 with trouble report and resolution information, they can use ECTA. As a
12 machine-to-machine interface, the CLEC can integrate ECTA with its
13 internal OSS.

14
15 The second difference deals with the functionality of the interfaces. TAFI
16 and ECTA both provide the functionality to enter a trouble report, modify
17 the trouble report, obtain status information during the life of the trouble
18 report, and cancel the report for non-designed services. ECTA, however,
19 provides this functionality for both designed and non-designed services
20 whereas TAFI's functionality is limited only to non-designed services.
21 Additionally, for non-designed services, TAFI has the intelligence to
22 execute the appropriate test for that telephone number or retrieve the
23 relevant data to help analyze the problem reported. For example, if a
24 customer were to report that the customer's call forwarding feature was
25 not working, the TAFI system would check the customer's records to see if

1 the line should be equipped with the call forwarding feature. If verified that
2 the line should be equipped, TAFI would then electronically verify whether
3 the feature has been programmed in the switch serving that customer's
4 line. Once the TAFI analysis of the trouble is complete, TAFI provides a
5 recommendation of what is needed to correct the problem and in some
6 cases implements the corrective action. ECTA does not provide this "on-
7 line" resolution capability.

8

9 The final difference deals with industry standards. As previously
10 discussed ECTA is built on the ANSI standards T1.227, T1.228 and
11 T1.262. TAFI is not a standards-based interface. This is important as it
12 relates to AT&T's issue. If TAFI functionality were built into ECTA, then
13 ECTA would no longer be a standards-based interface. In addition, it
14 would add considerable costs that would be borne by all CLECs although
15 AT&T is the only CLEC that has expressed interest for such.

16

17 Q. DID THE FCC ADDRESS THE INTEGRATION OF THE MAINTENANCE
18 AND REPAIR INTERFACES IN ITS MEMORANDUM OPINION AND
19 ORDER CC DOCKET NO 00-65 RELEASED ON JUNE 30, 2000 ("SWBT
20 ORDER")?

21

22 A. Yes. The FCC, in paragraph 203 of its SWBT order, concluded "that
23 SWBT offers maintenance and repair interfaces and systems that enable
24 a requesting carrier to access all the same functions that are available to
25 SWBT's retail representatives." "Both the [applicable to applications

1 Electronic Bonding Trouble Administrative interface] EBTA and [Graphical
2 User Interface Toolbar Trouble Administration interface] Toolbar interfaces
3 flow directly into SWBT's back-end OSS systems and enable competing
4 carriers to perform the same functions, in the same manner, that SWBT's
5 retail operations perform.”

6
7 In footnote 565 of the SWBT order, the FCC further “determined that a
8 BOC is not required, for the purpose of satisfying checklist item 2, to
9 implement an application-to-application interface for maintenance and
10 repair functions – provided it demonstrates that it provides equivalent
11 access to its maintenance and repair functions in another manner.”

12

13 Q. HAS AT&T BROUGHT THIS ISSUE UP BEFORE?

14

15 A. Yes. BellSouth has repeatedly reminded AT&T that ECTA is built
16 according to industry standards, which were required by AT&T's original
17 Interconnection Agreement. If AT&T requires additional ECTA
18 functionality, ECIC must develop the appropriate standard methodology
19 prior to BellSouth's consideration.

20

21 BellSouth representatives have informed AT&T on numerous occasions
22 that BellSouth could develop a non-industry standard integrated gateway
23 interface that would provide the various data elements and processing
24 logic that would emulate TAFI functionality. Development of such a new
25 non-industry standard machine-to-machine interface would require a

1 BonaFide Request (“BFR”) from AT&T and AT&T would have to pay for
2 this development in advance. Submission of a BFR is the process used
3 for providing customer products and/or services. The BFR process is
4 outside the scope of the CCP. To date, BellSouth has not received a BFR
5 from AT&T requesting this type of interface nor has AT&T
6 introduced/negotiated this as part of its new Interconnection Agreement
7 with BellSouth.

8

9 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS REGARDING ISSUE 24.

10

11 A. BellSouth provides appropriate nondiscriminatory access to TAFI and
12 ECTA and is not required to provide any additional functionality.

13

14 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

15

16 A. Yes.