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1   BELLSOUTH TELECOMMUNICATIONS, INC.

2   REBUTTAL TESTIMONY OF RONALD M. PATE

3   BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

4   CASE NO. 2000-465

5   FEBRUARY 20, 2001

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6

7

8   Q.   PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH

9   TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

10

11   A.   My name is Ronald M. Pate. I am employed by BellSouth

12   Telecommunications, Inc. ("BellSouth") as a Director, Interconnection

13   Services. In this position, I handle certain issues related to local

14   interconnection matters, primarily operations support systems ("OSS").

15   My business address is 675 West Peachtree Street, Atlanta, Georgia

16   30375.

17

18   Q.   HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

19

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

21

22   Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY?

23

24   A.   The purpose of my rebuttal testimony is to address various concerns and

25   issues raised in the direct testimony filed by AT&T – specifically that of

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1   AT&T Witness Jay M. Bradbury – in areas related to Operations Support

2   Systems ("OSS"). I will respond to Mr. Bradbury's allegations made

3   against BellSouth in the following:

4

5   Issue 19 – Operator Services/Directory Assistance ("OS/DA")

6   Issue 22 – BellSouth's Change Control Process ("CCP")

7   Issue 23 – Specific changes to BellSouth's ordering and pre-

8   ordering interfaces

9   Issue 24 – Specific improvements to BellSouth's maintenance and

10   repair interfaces

11

12   I will show that, for each area listed above, BellSouth has taken positive

13   steps to respond to AT&T's formal requests, *if doable and reasonable* –

14   the same as BellSouth would do for any CLEC. Very simply, it is

15   BellSouth's position that it is in compliance with current FCC and state

16   commission orders and rulings with regard to its dealings with CLECs, and

17   that BellSouth continues to monitor itself for such compliance in the face

18   of an ever-evolving industry.

19

20

21   ***Issue 19: What procedures should be established for AT&T to obtain loop-***

22   ***port combinations (UNE-P) using both Infrastructure and Customer-***

23   ***Specific Provisioning?***

24

1   Q.   MR. BRADBURY CONTENDS ON PAGE 22 OF HIS TESTIMONY THAT

2   BELLSOUTH HAS NOT SUPPLIED AT&T WITH ALL OF THE DETAILED

3   TECHNICAL METHODS AND PROCEDURES THAT IT NEEDS TO

4   IMPLEMENT OPERATOR SERVICES/DIRECTORY ASSISTANCE

5   ("OS/DA") ROUTING. WHAT HAS BELLSOUTH PROVIDED TO AT&T IN

6   REGARD TO OS/DA?

7

8   A.   As I stated in my direct testimony, BellSouth provided AT&T with proposed

9   contractual language for the three types of routings for its OS/DA calls

10   (unbranded, branded and third-party platform). AT&T was given the

11   unbranded contractual language in August 2000, and both the branded

12   and third-party platform contractual language in October 2000. Each

13   document provides the process for establishing the AT&T "footprint order"

14   for that particular option, and these three documents were provided

15   together as Direct Exhibit RMP-2.

16

17   Additionally, Mr. Bradbury states in a footnote on Page 34 that "AT&T has

18   yet to receive footprint ordering instructions from BellSouth". BellSouth, in

19   fact, provided the user requirements for the unbranded OS/DA option –

20   with ordering instructions – to AT&T mid-November 2000 in response to

21   their actual request for that option for a specific project – the so-called

22   "friendly test" to which he refers on Page 35. In fact, that test is the only

23   request that AT&T has made of BellSouth for the actual provisioning of

24   OS/DA routing. The User Requirements document was provided as Direct

25   Exhibit RMP-3.

1

2   Mr. Bradbury also claims that BellSouth "has not produced detailed

3   technical methods and procedures sufficient to inform AT&T of

4   requirements for ordering customized routing". The aforementioned User

5   Requirements document provides that information for the only firm request

6   that AT&T has made to BellSouth for the provisioning of OS/DA routing.

7

8 Q.   WHAT OTHER INFORMATION DOES BELLSOUTH THINK THAT AT&T

9   NEEDS TO ESTABLISH THE "FOOTPRINT ORDER" AND CUSTOMER-

10   SPECIFIC PROVISIONING FOR UNBRANDED OS/DA?

11

12 A.   BellSouth believes that it has furnished AT&T with the information that it

13   needs to establish its footprint orders. Basically, for each central office in

14   which AT&T wants to pre-program various routings, it has to tell BellSouth

15   what it wants to do. That is, does AT&T want to route a call to a BellSouth

16   OS/DA platform, or does it want to route the calls to an AT&T platform, or

17   does it want to make some other choice. Mr. Milner can describe this in

18   more detail, but the point is that if AT&T will tell us what they want to do in

19   a particular central office, we will work with them and get the programming

20   accomplished. That is conditional upon AT&T's willingness to pay for this

21   service, which AT&T has indicated is acceptable. To the extent that AT&T

22   needs more formal information before launching these activities, I

23   understand that Mr. Milner and others have been working directly with

24   AT&T to satisfy its concerns.

25

1 Q.   MR. BRADBURY STATES ON PAGE 32 OF HIS TESTIMONY THAT

2   BELLSOUTH PROVIDES NO PROCESSES FOR ELECTRONIC

3   ORDERING OF CUSTOMER-SPECIFIC OS/DA. IS THAT TRULY THE

4   CASE?

5

6 A.   Definitely not. This is actually a different aspect of this issue than I

7   discussed above. Once AT&T tells us which central offices it wants to

8   pre-program so its subscribers can reach the OS/DA platform that AT&T

9   wants for that customer, AT&T then has to submit an individual customer

10   order, a Local Service Request ("LSR") so that we can provide service to

11   that specific end-user.   AT&T wants to be able to submit this request

12   electronically, and BellSouth has arranged for AT&T to do so.

13

14   Mr. Bradbury cites on Page 32 AT&T's formal change request

15   (EDI020900_001 – Electronic Order Routing to OS/DA) submitted in

16   February 2000, and this is the same change request for which BellSouth

17   implemented the OS/DA unbranded option as part of Release 8.0 on

18   November 18, 2000. Because of this implementation, orders issued by

19   AT&T for its specified project can be submitted electronically by simply

20   following the BellSouth business rules for ordering port/loop combinations.

21   No special or additional entries are required on the LSRs.

22

23 Q.   IN HIS TESTIMONY, MR. BRADBURY MAKES REFERENCES ON

24   PAGES 32 THROUGH 36 REGARDING BELLSOUTH'S "UNILATERAL

25   DECISION" TO REMOVE THIS FEATURE FROM RELEASE 8.0. SINCE

1 THE FEATURE HAS BEEN IMPLEMENTED, WHY DOES HE STILL

2 ADDRESS THIS?

3

4 A. It is unclear why Mr. Bradbury continues to make an issue of a decision

5 that occurred through some miscommunication, but that was never

6 implemented. BellSouth has acknowledged that it mistakenly decided and

7 communicated that the feature would be removed from Release 8.0. More

8 importantly, however, immediate action was taken when the situation was

9 brought to Mr. Keith Milner's and my attention. The release occurred as

10 scheduled with all of the parts necessary to allow electronic ordering as

11 requested by AT&T.

12

13 I will note, however, that Mr. Bradbury does have one point here that is

14 correct. AT&T had requested this functionality for a specific central office

15 (Atlanta – Peachtree Place), and the Release 8.0 software package that

16 was implemented was intended to allow AT&T's electronically-placed

17 service requests to flow through BellSouth's provisioning systems and

18 generate service orders with the proper information to route AT&T's end

19 users to the unbranded OS/DA option.

20

21 Concurrent with – but separate from – the Release 8.0 programming, work

22 was supposed to be done in the Peachtree Place central office that would

23 allow the downstream service orders generated from AT&T's service

24 requests to be worked in the Peachtree Place central office for each end

25 user. Unfortunately, the programming in the Peachtree Place central

1 office was done incorrectly, which prevented the OS/DA routing from

2 operating as intended. While that is regrettable, and BellSouth would

3 have certainly preferred that it not happen, central offices are nothing but

4 huge computers and when their programming is changed, sometimes

5 there are problems – specifically human error in this situation.

6 Unfortunately, it was the first time that we tried to implement the program,

7 and there was a problem.

8

9 The fact that we had a problem, however, does not mean that we have not

10 tried to accommodate AT&T's request with regard to this issue. We are

11 using our best efforts to accommodate AT&T's requests and will continue

12 to do so. Quite frankly, given these circumstances, it is not at all clear

13 what they want the Commission to do with regard to this issue.

14

15 Q. ON PAGE 37, MR. BRADBURY INDICATES THAT HE IS NOT CERTAIN

16 THAT THE AFOREMENTIONED SITUATION HAS BEEN CORRECTED.

17 PLEASE PROVIDE THAT ASSURANCE.

18

19 A. The situation was indeed corrected on January 13, 2001, as indicated in

20 the letter from Mr. Milner and Mr. Pate to which Mr. Bradbury refers. Mr.

21 Bradbury goes on to refer to notice from BellSouth's AT&T account team

22 that the testing of OS/DA by AT&T cannot take place until AT&T signs an

23 amended test agreement for Phase 4 of the trial under which OS/DA is to

24 be tested. That is a true statement, and one of which AT&T's testing

25 manager has been aware all along. In fact, the testing manager has

1		indicated to BellSouth that he has not sent any OS/DA-related test
2		scenarios because he knew the amended agreement had not been signed
3		for Phase 4 of the test.
4		
5		I would also like to note that AT&T recently requested an extension for
6		Phase 3 of the test until March 31, 2001. That means that Phase 4 (which
7		is the testing of OS/DA) will not begin prior to early April. It is not clear to
8		BellSouth why AT&T is conveying such a sense of urgency in this matter
9		when it is not yet ready to test our capability itself.
10		
11	Q.	WHAT DOES BELLSOUTH UNDERSTAND TO BE THE REAL ISSUE
12		WITH REGARD TO ELECTRONIC ORDERING OF ACCESS TO OS/DA?
13		
14	A.	The real issue has recently become very clear. BellSouth has a single
15		default routing for its OS/DA traffic. We route our calls to a BellSouth
16		platform where a BellSouth operator answers the call. There is nothing
17		special that has to be done when a BellSouth subscriber orders service.
18		The order automatically defaults to that routing. Since AT&T is entitled to
19		parity, we have offered to AT&T, the ability to select a "default", just like
20		BellSouth has, for its OS/DA routing. Indeed, we have gone further than
21		that. We have offered to give AT&T a different "default" in each state in
22		which we operate.
23		
24		That just isn't good enough for AT&T. Instead, AT&T wants to be able to
25		select from among as many as four options for each of its subscribers and

1   it wants BellSouth to do the programming, at BellSouth's expense, that will

2   allow AT&T to accomplish this result without any effort on AT&T's part.

3   Parity doesn't require BellSouth to do this. Indeed, our review of the

4   situation indicates that it would require major work on our own operations

5   systems to accomplish this. AT&T has shown no willingness to pay for

6   this, and BellSouth is not obligated to do it.

7

8 Q.   DOES THAT MEAN THAT ALTHOUGH AT&T MIGHT WANT TO CHOSE

9   FROM AMONG AS MANY AS FOUR ALTERNATIVES FOR ITS

10   INDIVIDUAL CUSTOMERS' OS/DA SERVICE, BELLSOUTH IS

11   DICTATING THAT AT&T MUST CHOSE A SINGLE DEFAULT?

12

13 A.   Absolutely not, and that is one of the more frustrating points associated

14   with this issue. Mr. Milner can explain this better than I can, but, basically,

15   AT&T can have whatever choices it wants for its customers' OS/DA traffic.

16   Each option that AT&T selects requires a different trunk group in each

17   central office to get the calls to the place for which they are destined. In

18   order to point the calls to the right trunk groups, line class codes are used.

19   These are essentially computer instructions that tell the computer where to

20   send the call. We can program our switches to automatically select one

21   routing, or a "default." If AT&T wants to select another routing for a

22   particular customer, it can, if it provides us with the appropriate line class

23   codes for that particular routing in the central office from which the

24   customer is served. The only dispute here is who has to provide the line

25   class codes in such a situation. AT&T does not want its service

1 representatives to have to take the time to put the line class codes on

2 orders that vary from the "default." BellSouth doesn't believe that it is

3 obligated to do so on AT&T's behalf in these circumstances.

4

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

6

7 A. This issue continues to be a problem for which there seems to be no

8 viable solution that will satisfy AT&T. Mr. Milner once again discusses the

9 issue in his direct and rebuttal testimony, but the bottom line is that we

10 have furnished AT&T the information necessary to do electronic ordering

11 in the one case where AT&T has indicated a desire to do so. AT&T

12 seems to want something more, which, as Mr. Milner describes, is beyond

13 the pale.

14

15 Based upon AT&T's requests for documentation and availability of all

16 OS/DA options in all locations, it is clear that AT&T would like for

17 BellSouth to equip all central offices in BellSouth's nine-state region with

18 all of the OS/DA options in the unlikely event that a CLEC (more precisely,

19 AT&T) *might* want to place orders at any time and at any place. That

20 simply isn't feasible based upon an overall lack of CLEC demand for

21 OS/DA options, nor is it viable from a financial standpoint. While providing

22 OS/DA options on an as-requested basis may not suit all of AT&T's

23 requests, BellSouth nonetheless has a reasonable process for providing

24 OS/DA. AT&T's opinion of what is reasonable for BellSouth to do on a

25 region-wide basis is simply that – its opinion.

1

2   I would like to reiterate from my direct testimony that BellSouth has made

3   that process available to all CLECs, and posted that information on

4   BellSouth's Interconnection Services website via Carrier Notification

5   SN91082004 on November 22, 2000 (Provided as Direct Exhibit RMP-4).

6   Per the instructions in the Carrier Notification, inquiries for this feature may

7   be made to the CLECs' account team representative.

8

9   Q.   IN HIS SUMMARY ON PAGE 37, MR. BRADBURY ASKS THE

10   COMMISSION TO ORDER BELLSOUTH TO PROVIDE AT&T WITH

11   SPECIFIC DOCUMENTED METHODS AND PROCEDURES FOR EACH

12   OF THE CUSTOMIZED ROUTING METHODS. DO YOU HAVE

13   COMMENTS ON THAT REQUIREMENT?

14

15 A.   Yes. As BellSouth provided AT&T with the appropriate methods and

16   procedures for the unbranded option at such time as they made an actual

17   request for BellSouth to provide that option, so, too, would BellSouth

18   provide the same for either of the other two options based upon the

19   specificity of AT&T's request.

20

21 Q.   WHAT WOULD YOU LIKE FOR THE COMMISSION TO DO IN

22   RESPONSE TO AT&T'S ALLEGATIONS?

23

24 A.   Find that BellSouth has responded to AT&T's change request to

25   implement electronic ordering for OS/DA capability based upon the

1   parameters of its specified project, and the process doesn't require AT&T

2   to place any special indicators on its LSRs. In addition to documentation

3   given to AT&T for this project, BellSouth has also provided instructions on

4   how to obtain other options of OS/DA routing for future requests, and has

5   made that same information available to the general CLEC community.

6   BellSouth believes it has satisfied what Mr. Bradbury outlines in his

7   summary request of this Commission.

8

9

10   ***Issue 22: Should the Change Control Process be sufficiently***

11   ***comprehensive to ensure that there are processes to handle at a***

12   ***minimum the following situations:***

13   ***a)   introduction of new interfaces***

14   ***b)   retirement of existing interfaces***

15   ***c)   exceptions to the process***

16   ***d)   documentation, including training***

17   ***e)   defect correction***

18   ***f)   emergency changes (defect correction)***

19   ***g)   an eight-step cycle, repeated monthly***

20   ***h)   a firm schedule for notifications associated with changes***

21   ***initiated by BellSouth***

22   ***i)   a process for dispute resolution including referral to state***

23   ***utility commissions or courts***

24   ***j)   a process for escalation of changes in process***

25   ***k)   testing support and a testing environment***

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

2 ***m)   a process for the cancellation, rejection or reclassification of***

3 ***CLEC change requests***

4 ***n)   a process for prioritization and assignment of change requests***

5 ***to future releases for implementation***

6 ***o)   a process for changing the process***

7

8 Q.   ON PAGE 51 OF MR. BRADBURY'S TESTIMONY REGARDING

9 BELLSOUTH'S CHANGE CONTROL PROCESS ("CCP"), HE CLAIMS

10 THAT BELLSOUTH'S CCP IS INADEQUATE. WOULD YOU PLEASE

11 RESPOND TO THAT CLAIM?

12

13 A.   Yes. I will start by reiterating BellSouth's position from my direct testimony

14 that the Change Control Process is not a proper issue for arbitration with

15 an individual CLEC before an individual state authority. The CCP covers

16 BellSouth's regional interfaces and processes, and affects a CCP

17 membership of what has grown to approximately 100 CLECs.

18 Collaborative decisions that come from issues submitted to the CCP

19 ultimately affect over 300 CLECs that are currently actively operating in

20 BellSouth's nine-state region (Note: There are over 1,600 commission-

21 approved CLECs around the region). As I stated in my direct testimony on

22 Page 23, our position is supported by the North Carolina Public Service

23 Commission's Staff proposed recommended order from similar arbitration

24 proceedings which states that "this arbitration docket is an inappropriate

1 forum for consideration of wholesale modifications to the CCP or the CCP

2 document, as proposed by AT&T."

3

4 Moving beyond this, however, the issue of the adequacy of BellSouth's

5 CCP also is being addressed by KPMG, the company approved by the

6 Florida and Georgia Public Service Commissions to perform Third Party

7 Testing per the orders of those Commissions. BellSouth believes that

8 determination of adequacy of the CCP can be properly assessed and

9 documented as part of the Third Party Testing process currently taking

10 place in Florida and Georgia.

11

12 Q. MR. BRADBURY FURTHER STATES ON PAGE 57 OF HIS TESTIMONY

13 THAT BELLSOUTH'S CCP IS "NOT COLLABORATIVE". WHAT IS

14 BELLSOUTH'S VIEW OF THE COLLABORATIVE NATURE OF THE

15 CCP?

16

17 A. The process is clearly "collaborative." It is just not subject to the control of

18 AT&T, which is Mr. Bradbury's real issue. Mr. Bradbury insists that the

19 CCP document Version 2.0 is the appropriate document to discuss in this

20 arbitration, as he states on Page 65 of his testimony. However, while

21 explaining how the Commission should order adoption of AT&T's

22 proposed "red line" Version 2.0, he fails to mention that AT&T's document

23 was later submitted to the CCP formally as a change request (as AT&T

24 should have done earlier, according to the CCP rules regarding changes

25 to the process), and that a decision was made within the CCP (and not

1   just at BellSouth's insistence, as Mr. Bradbury alleges in his footnote on

2   Page 53 of his testimony) to develop a sub-team of CLECs to collectively

3   build upon AT&T's original proposed changes, and to present a joint CLEC

4   proposal to the total CCP membership. AT&T's regular representative to

5   the CCP agreed to the suggestion, and also agreed to head the effort.

6   What is missing from Mr. Bradbury's testimony is the part about BellSouth

7   having the opportunity to respond to this joint CLEC proposal. It is not

8   clear how BellSouth and the other CLEC's could be acting more

9   "collaboratively". We just are not doing precisely what AT&T wants, which

10   evidently makes us "non-cooperative."

11

12   As I discussed in detail in my direct testimony, BellSouth submitted its

13   proposed changes to CCP document Version 2.0 to the sub-team on

14   December 5, 2000, and that document – which includes both the CLEC-

15   proposed changes and BellSouth's agreement, disagreement or

16   compromise proposal to those changes – was the document that was

17   under review by the sub-team. It was provided as Direct Exhibit RMP-19.

18

19   I also mentioned in my direct testimony that a new version of the CCP

20   document Version 2.1 with a number of agreed-upon and voted-for

21   changes would be posted to the CCP website on or about February 9,

22   2001, and I included a *draft* copy as Exhibit RMP-23. That posting, in

23   fact, occurred on February 9, and I have provided that posted *final* version

24   as Exhibit RMP-36. Additionally, the CCP will continue to maintain a

25   marked-up version of the 2.1 document as a "working version" (provided

1   as Exhibit RMP-37). Its intent is to indicate those issues that still remain

2   open from the original version of 2.0 (Direct Exhibit RMP-19) that

3   contained both the CLEC- and BellSouth-proposed changes. I will refer to

4   these documents (Exhibits RMP-36 and RMP-37) later in this testimony to

5   show the Commission that AT&T's various claims of inadequacy and non-

6   collaborative process cannot be supported.

7

8   In addition to KPMG's Third Party Testing assessment and documentation

9   of BellSouth's CCP, the current sub-team activity suggests that the CLECs

10 *and* BellSouth are interested in working toward solutions and

11 compromises that *improve the current* process and are acceptable to the

12 industry *as a whole*. The point is that the CCP is an evolving process, and

13 BellSouth feels it is more appropriate to look at the current and future

14 direction of the CCP rather than simply acceding to AT&T's demands,

15 which is evidently all that will satisfy AT&T in this regard.

16

17 Q.   MR. BRADBURY ALSO CLAIMS ON PAGE 57 THAT BELLSOUTH HAS

18   TOTAL CONTROL AND VETO POWER OVER THE CCP, AND "MAY

19   SIMPLY IGNORE THE BUSINESS NEEDS AND WISHES OF THE CLEC

20   COMMUNITY". HOW DO YOU RESPOND TO THIS CLAIM?

21

22 A.   What he really means is that there isn't a line in the CCP that indicates

23   that whatever AT&T wants, it gets, irrespective of whether the request is

24   reasonable or even concurred in by the rest of the affected CLECs. As

25   part of the CCP's collaborative effort – where consensus is required to

1 make decisions – BellSouth and the CLECs have made a concerted effort

2 to incorporate all reasonable and doable requests for changes. That is

3 reflected in the current CCP document Version 2.1 (Exhibit RMP-36).

4 AT&T apparently feels that BellSouth has no rights as a stakeholder in this

5 process, and should automatically acquiesce to CLEC requests even if

6 those requests fall outside of BellSouth's obligations under FCC orders,

7 are not doable under BellSouth's current processes, or require BellSouth

8 to make substantial financial investment for a limited potential utilization by

9 the CLEC community as a whole.

10

11 BellSouth follows the review process as stated in the CCP guidelines for

12 all change requests submitted by CLECs, and responds via the CCP in

13 what it feels is the appropriate manner, and gives appropriate

14 consideration to each such request. The idea that BellSouth has final veto

15 power is addressed by the CCP guidelines for dispute resolution as I

16 explained fully in my direct testimony. Suffice it to say here that the option

17 exists for AT&T or any other CLEC to take a dispute to a higher authority

18 for resolution, if necessary. The dispute resolution process – while it does

19 exist in the current CCP document Version 2.1 – is still under review by

20 the CCP because of some fundamental concerns by both parties about

21 the suggested language.

22

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

24

1   A   Certainly. In fact, AT&T has raised a perfect example in one of our recent

2   arbitrations. Specifically, in considering changes to the CCP, BellSouth

3   and the CLECs had 34 issues that were under consideration and that

4   were submitted for a vote. Twenty-seven of the changes were adopted.

5   There was disagreement between BellSouth and the CLECs with the

6   remaining seven. An example of one of these seven issues over which

7   the CLECs and BellSouth disagreed is issue 34, which dealt in part with

8   the dispute resolution process. Basically, the section of the CCP that was

9   involved allowed parties to a dispute to seek mediation or, if they chose, to

10   simply go straight to a commission for resolution of the issue. The

11   disagreement between the CLECs and BellSouth was pretty simple. The

12   CLECs wanted to add a sentence to the section that required BellSouth to

13   notify every CLEC of a proposed mediation or a formal complaint. The

14   BellSouth version had an additional sentence in it that provided that if a

15   dispute was taken to mediation and resolved, that the resolution would be

16   binding on all CLECs with the same issue.

17

18   The CLECs obviously disagreed with BellSouth's position because without

19   the sentence, every CLEC would get its own bite at the apple. It is sort of

20   like the way that AT&T is taking the issues of the CCP to every state

21   commission, hoping to find just one that will agree with AT&T about the

22   CCP. With regard to the dispute resolution, if eight CLECs all had the

23   same problem, under their approach to the problem, they could seek

24   mediation one at a time, hoping that one could find a favorable mediator.

25   Common problems need to be handled efficiently. Trying a case over and

1   over again because one of the players keeps hoping to get a better result

2   just does not make much sense.

3

4   I want to reiterate, however, that BellSouth does not have the final word

5   on this issue. The CCP has a dispute resolution process in it. If the group

6   of CLECs that were supporting the CLEC version of issue 34 think that

7   they can get a state commission to approve language that would allow

8   piecemeal approaches to problems, then they ought to use the escalation

9   process to test that. BellSouth is more than willing to defend the

10   reasonableness of its position. It will be interesting to see whether the

11   CLECs feel the same way.

12

13   Q.   MR. BRADBURY CONTENDS ON PAGE 58 OF HIS TESTIMONY THAT

14   BELLSOUTH DID NOT COMPLY WITH A CCP REQUIREMENT THAT

15   "SIZING AND SEQUENCING OF PRIORITIZED CHANGE REQUESTS

16   WILL BEGIN WITH THE TOP PRIORITY ITEMS AND CONTINUE DOWN

17   THROUGH THE LIST UNTIL THE CAPACITY CONSTRAINTS HAVE

18   BEEN REACHED". ARE YOU FAMILIAR WITH THIS SITUATION?

19

20   A.   Yes. Mr. Bradbury is again referring to Release 8.0, which was

21   implemented on November 18, 2000, and contained several low-priority

22   items, along with several high-priority items. Although some "low-priority

23   items" were included in the release, this in no way impacted whether other

24   high-priority items could have been included. In many instances during

25   major releases, there are changes that can be made with very little

1 expenditure of time and/or money, or without extensive software

2 development. Since the low-priority items are on the list to be worked at

3 some point anyway, it makes perfect sense to include all that can be

4 included without jeopardizing implementation milestones, which would

5 have been the case had BellSouth tried to include too many of the high-

6 priority items. Filling out a release with "easy-to-accomplish" items, even if

7 they are low priority, only makes sense. Release 8.0 could have been

8 implemented without the "low-priority items" but no additional "high

9 priority" items would have been included as a result. That doesn't make

10 much sense, but is typical of the sort of complaint that AT&T seems intent

11 on making until it finally just gets its own way.

12

13 Mr. Bradbury would have this Commission believe that BellSouth does this

14 in an attempt to delay or harm the CLECs' ability to compete, and that

15 simply isn't the case. I will further add that it has long been the procedure

16 to rely on the use of "point" releases (e.g., 8.1, 8.2, etc.) to pick up

17 additional high- and low-priority items without waiting for the next major

18 release (e.g., 9.0, 10.0, etc.).

19

20 Q.   MR. BRADBURY FURTHER ASSERTS ON PAGE 59 THAT

21   BELLSOUTH "ROUTINELY ELECTS NOT TO COMPLY" WITH THE

22   CCP'S REQUIREMENTS, USING AS AN EXAMPLE THE RELEASE OF

23   ISSUE 9G OF BELLSOUTH'S BUSINESS RULES FOR LOCAL

24   ORDERING, WHICH HE CLAIMS WAS DONE WITH LITTLE ADVANCE

25   NOTICE TO CLECs, THAT BELLSOUTH REFUSED TO WITHDRAW

1   THE CHANGES, AND THAT THE RELEASE CONTAINED

2   PROGRAMMING DEFECTS THAT COULD HAVE BEEN AVOIDED HAD

3   BELLSOUTH MADE THE RELEASE AVAILABLE TO CLECS FOR PRE-

4   TESTING. WHAT IS YOUR RESPONSE?

5

6 A.   First, let me say that BellSouth does not "routinely" elect not to comply

7   with the CCP's requirements. With that said, it appears that AT&T has

8   managed to identify one situation where BellSouth should have run a

9   release through the CCP and failed to do so. This was Issue 9G of the

10   BellSouth Business Rules for Local Ordering ("BBR-LO"). We posted the

11   notice on August 31, 2000, to be effective October 2, 2000, thus providing

12   the requisite notice. We did not, however, properly process the matter

13   through the CCP. This occurred simply because the release was primarily

14   intended to correct defects in documentation that had previously been

15   identified and the people responsible evidently thought that since the

16   release was primarily to correct matters that had already been identified

17   as errors, processing it through the CCP again wasn't necessary.

18   However, in addition to the documentation changes, there was one minor

19   software change also included in the release.

20

21   Unfortunately, and as AT&T knows, there was a problem with the software

22   change which was corrected soon thereafter. Our rationale for going

23   forward with the release of the documentation changes, which is no

24   excuse for not following the process, was that the documentation changes

25   were corrections to existing documentation, which should not have been

1   anything other than a ministerial task, and was for the purpose of

2   benefiting the CLECs who rely on the documentation that was being

3   corrected. This is not, however, a systemic problem that I am aware of.

4   Given AT&T's penchant for documenting alleged problems, one would

5   assume that if this were a regular and constant problem, they would have

6   reams of examples. I do not believe this is the case. Our company is

7   committed to following the CCP. We have agreed to language that

8   requires us to do so. I wish I could guarantee that we would never make a

9   mistake, but that would simply be unreasonable. We are committed to

10 using our best efforts to make this process work, and we believe that on

11 the whole it does.

12

13 Q. STARTING ON PAGE 59 OF HIS TESTIMONY, MR. BRADBURY

14   MAKES A SERIES OF ADDITIONAL ALLEGATIONS THAT BELLSOUTH

15   HAS THE POWER TO IGNORE THE REQUIREMENTS OF THE CCP.

16   WHAT IS YOUR RESPONSE?

17

18 A. Mr. Bradbury continues to be obsessed with the notion that BellSouth has

19   total control and power in the CCP, and that just isn't true. Regarding his

20   statement on Page 60 at line 7 that BellSouth "unilaterally decided to

21   establish a new, additional meeting it calls the 'CCP Process Improvement

22   Meeting,'" BellSouth simply made a suggestion that, because of the scope

23   and magnitude of AT&T's change request for changing the CCP

24   document, it should possibly be handled by a CLEC subcommittee. The

25   suggestion (along with the name 'Process Improvement') received the

1　blessing of the CCP, and BellSouth was also invited to participate. As I

2　stated in my direct testimony, AT&T's own CCP representative agreed to

3　facilitate the subcommittee. Since the CCP document affects the entire

4　CLEC community (not just AT&T) as well as BellSouth, the idea of a multi-

5　CLEC subcommittee made absolute sense.

6

7　When Mr. Bradbury says at line 23 that BellSouth at the November 1,

8　2000 meeting "effectively deferred meaningful discussion of CR[0]171 until

9　a meeting to be held on December 7, 2000", he conveniently ignores the

10　fact that it had been agreed that BellSouth would have a chance to review

11　the changes agreed upon by the CLECs at the October 17 and 27, 2000

12　meetings. He would have the Commission believe that BellSouth had

13　agreed to accept whatever changes were given to BellSouth with no

14　questions asked. Mr. Bradbury even says himself that BellSouth did not

15　receive the document with the changes until November 5, 2000.

16

17　At line 16 on Page 61, Mr. Bradbury complains that BellSouth did not

18　respond to the CLECs until late on December 5, 2000. What he

19　apparently does not understand is that all of the changes suggested by

20　the CLECs are not within the decision-making jurisdiction of BellSouth's

21　CCP representatives. It is clear that requests for shortened intervals, for

22　example, can affect a wide range of departments and processes, and

23　determining BellSouth's agreement or disagreement with proposed

24　changes for this example as well as others necessarily requires input from

1   all parties that are involved. BellSouth provided that response as soon as

2   it was able to do so.

3

4   On Page 62 at line 13, Mr. Bradbury suggests that BellSouth should have

5   already issued change requests for changes in the existing CCP

6   document Version 2.0 to which it has agreed. While BellSouth might have

7   agreed in principle to certain of the proposed changes, BellSouth has said

8   all along that once the entire set of changes has been jointly agreed upon

9   within the entire CCP (not just between BellSouth and AT&T), it will issue

10   one change request for issuance of the entire revised version of the CCP

11   document. To do otherwise would be unduly burdensome on BellSouth

12   and the CCP change request review process.

13

14   Q.   ON PAGE 53 OF MR. BRADBURY'S TESTIMONY, HE STATES THAT

15   THE CURRENT CCP "FAILS TO COVER ALL AREAS THAT SHOULD

16   BE INCLUDED IN A ROBUST CHANGE CONTROL PROCESS" PER

17   THE FCC'S GUIDANCE. WHAT IS BELLSOUTH'S OPINION OF

18   COVERAGE OF THE AREAS SPECIFIED BY MR. BRADBURY?

19

20   A.   BellSouth cannot find one area listed by Mr. Bradbury that isn't covered by

21   BellSouth's CCP document Version 2.0, and, now, the newly posted

22   Version 2.1 and the 'working version" 2.1. He also inexplicably refers to

23   the I-CCP, and regardless of whether he means the original interim CCP

24   or an earlier version of the CCP document, the reference has no

25   relevance in a discussion of the recent Version 2.0 or the now-current

1 Version 2.1. Mr. Bradbury also uses the phrases 'does not adequately

2 cover' or 'does not provide an adequate process for' as he delineates the

3 areas that he purports are deficient. Those phrases certainly represent

4 AT&T's highly subjective opinions of those areas of the CCP. However, in

5 spite of AT&T's opinions about the current CCP document, BellSouth

6 firmly believes that the newly-posted CCP document Version 2.1, along

7 with the 'working document" containing both CLEC- and BellSouth-

8 proposed changes that continues to be reviewed by the CCP sub-team

9 will ultimately become the document that best serves the interest of the

10 CLEC community as a whole, as well as BellSouth. The consensus

11 acceptance of the proposed document as the new baseline document

12 should render AT&T's complaints and allegations moot. Moreover,

13 consider this additional point: There are dozens of arbitrations going on

14 around the BellSouth region at this point. AT&T is the only CLEC that is

15 making the CCP an issue in the detail that is being presented here today.

16 The CCP may not meet AT&T's subjective standards (more of the "not-

17 invented-here" syndrome, probably), but clearly any number of CLECs are

18 using the system, without the incessant complaining that seems to have

19 become AT&T's hallmark.

20

21 Q. BEGINNING ON PAGE 66 OF MR. BRADBURY'S TESTIMONY, HE

22 MAKES ALLEGATIONS REGARDING EACH OF THE SUB-ISSUES

23 OUTLINED AT THE HEAD OF THIS ISSUE SECTION. HOW WILL YOU

24 RESPOND TO EACH SUB-ISSUE?

25

1   A.   In the preceding answer, I addressed Mr. Bradbury's general statements

2   regarding these sub-issues. As Mr. Bradbury has done beginning on

3   Page 66 of his testimony, I will address each sub-issue in order and with

4   more specificity. Although CCP document Version 2.0 (dated August 23,

5   2000) was the current operational document at the time of the filing of the

6   direct testimony, CCP document Version 2.1 (dated February 9, 2001) has

7   since been posted to the BellSouth Interconnection website.

8

9   BellSouth believes that it is more instructive and forward-looking to

10   consider the newly posted Version 2.1 document (Exhibit RMP-36) and

11   the document with both the CLEC- and BellSouth-proposed changes

12   (Exhibit RMP-37). The Commission will please note that the "working

13   version" also contains many agreed-upon items that have not been posted

14   yet because the items are sub-sets of larger sections that are still

15   considered to be open for further discussion within the CCP.

16

17   No doubt AT&T would prefer to continue looking only at the August 23,

18   2000 document and the CLEC-proposed changes in an effort to minimize

19   the amount of collaborative effort put forth by BellSouth in an attempt to

20   better respond to the CLEC community as a whole, but if the Commission

21   is going to look at this document, it ought to look at the most current

22   version or at least at the language that has been agreed to by the majority

23   of the participating CLECs.

24

1　　　　(NOTE: Beginning with sub-issue *k*, and continuing through sub-issue *o*,

2　　　　Mr. Bradbury has deviated from the sequence of sub-issues as outlined in

3　　　　the filed issues matrix. I elect to address them in the order as filed.)

4

5

6　　　　**a) Introduction of new interfaces**

7

8 Q.　MR. BRADBURY STATES ON PAGE 67 OF HIS TESTIMONY THAT

9　　　　LANGUAGE PROPOSED BY BELLSOUTH WOULD ALLOW ONLY

10　　　BELLSOUTH TO DETERMINE WHETHER CHANGES TO NEW

11　　　INTERFACES SHOULD BE MANAGED UNDER THE CCP DOCUMENT.

12　　　PLEASE RESPOND.

13

14 A.　The language actually states on Page 43 of Exhibit RMP-36 that changes

15　　　to new interfaces would, in fact, be managed by the process. Further, any

16　　　new interfaces deployed by BellSouth will be introduced to the CLEC

17　　　community as part of the CCP. This is consistent with my statements on

18　　　Page 60 of my direct testimony.

19

20 Q.　IN AN EFFORT TO CONVINCE THE COMMISSION THAT THE

21　　　DEVELOPMENT AND INTRODUCTION OF NEW INTERFACES

22　　　SHOULD FALL UNDER THE CCP, MR. BRADBURY CLAIMS ON PAGE

23　　　68 OF HIS TESTIMONY THAT BELLSOUTH HAS ENGAGED IN

24　　　SECRETIVE DEVELOPMENT OF NEW OSS INTERFACES,

25　　　SPECIFICALLY BELLSOUTH'S LOCAL NUMBER PORTABILITY

1   GATEWAY AND ITS ASSOCIATED PROCESSES. WHAT IS WRONG

2   WITH HIS CLAIM?

3

4   A.   Frankly, BellSouth is baffled by Mr. Bradbury's choice of the phrase

5   "secretive development of new OSS interfaces" as he relates it to the

6   Local Number Portability ("LNP") Gateway. I need to work backward with

7   that phrase to show its lack of merit.

8

9   First, the LNP Gateway is not an interface, but rather a data

10   communications server – with its own processor and memory – that

11   provides access between processes that use different access protocols.

12   A CLEC would utilize Electronic Data Interchange ("EDI") or

13   Telecommunications Access Gateway ("TAG"), for example, as the actual

14   interface over which to pass LNP service requests to the LNP Gateway.

15   Simply put, the LNP Gateway accepts a stream of data containing

16   information from an incoming local service request ("LSR") for LNP from

17   one of the CLEC interfaces or from a BellSouth representative inputting a

18   manual order. The Gateway then reformats that data into the

19   Telecommunications Industry Forum ("TCIF") standard. From that point,

20   the LNP Gateway serves as the control point for any transmission of

21   additional information regarding that request to and from the CLEC, other

22   downstream BellSouth provisioning systems, and the Number Portability

23   Administration Center ("NPAC"), to name a few.

24

1 Secondly, the LNP Gateway is not new. It was established over two years

2 ago as the "back-room" process used to provide number porting capability

3 to the CLECs. Development of the LNP Gateway was prior to the

4 formation of the CCP, and, as a "back-room" system, is not itself

5 technically subject to the CCP.

6

7 Thirdly, its development was hardly secret, inasmuch as its development

8 was required in response to regulatory mandates requiring ILECs to

9 provide local number porting capability to CLECs.

10

11 BellSouth accepts change requests ("CR") through the CCP for

12 enhancements and/or defect corrections to the *process* of issuing service

13 requests for LNP. Some of those CRs will appropriately affect the LNP

14 Gateway operation.

15

16 Q. MR. BRADBURY CONTINUES BY PROVIDING TWO EXAMPLES OF

17 HOW AT&T'S CUSTOMERS HAVE ALLEGEDLY BEEN VICTIMIZED BY

18 SUCH SECRECTIVE DEVELOPMENT. WHAT IS YOUR RESPONSE?

19

20 A. The examples of customer problems that Mr. Bradbury provided were the

21 result of failures in two of BellSouth's downstream databases – the Calling

22 Name, or CNAM, database, and ATLAS, the telephone number

23 reservation database. As AT&T knows, those databases are common to

24 both CLEC wholesale and BellSouth's retail operations, and neither is

25 within the scope of the CCP. Regardless of that fact, however, BellSouth

1   accepts the responsibility to correct ANY database problems that affect

2   ANY customer operations. The point relevant to this discussion, however,

3   is that those repairs and notifications are handled through processes other

4   than the CCP.

5

6   *b) retirement of existing interfaces*

7

8   Q.   ON PAGE 71 OF MR. BRADBURY'S TESTIMONY, HE INDICATES

9   THAT BELLSOUTH AND AT&T HAVE REACHED AGREEMENT ON A

10   PORTION OF THIS ISSUE. DOES BELLSOUTH AGREE WITH HIS

11   ASSESSMENT?

12

13   A.   Mr. Bradbury is correct in his assessment of the issue as it relates to

14   BellSouth and AT&T. However, it must be stressed that the CCP Version

15   2.1 document being presented for discussion as part of this proceeding is

16   a document being used in the collaborative effort of the CCP. Thus, the

17   language for this and any issue is subject to the CCP's final approval for

18   this CLEC-wide issue.

19

20   *c) exceptions to the process*

21

22   Q.   MR. BRADBURY STATES ON PAGE 71 OF HIS TESTIMONY THAT

23   AT&T WANTS A DOCUMENTED "EXCEPTION" PROCESS FOR

24   HANDLING TYPE 2-5 CHANGES UNDER UNUSUAL SITUATIONS, AND

1   THAT BELLSOUTH'S PROPOSAL IS UNACCEPTABLE. PLEASE

2   RESPOND.

3

4   A.   AT&T's desire to have an "exceptions" process is understandable – it

5   would give AT&T an avenue to circumvent the process for all of the

6   special "needs" it devises. In its proposal, AT&T offers no substantive

7   information about what an "exception" might be, and BellSouth strongly

8   believes that all of the situations that may come before the CCP are

9   covered by one of the categories already defined in the process. The

10   process does not need to add terms and/or categories that have no

11   objective criteria to define them, thereby leaving their meaning open to

12   interpretation.

13

14   *d) documentation, including training*

15

16   Q.   MR. BRADBURY STATES ON PAGE 72 OF HIS TESTIMONY THAT

17   CHANGES WHICH WILL RESULT IN REVISIONS TO THE TRAINING

18   MATERIALS AND JOB AIDS BELLSOUTH PRODUCES FOR CLECS

19   ARE INCLUDED WITHIN THE SCOPE OF THE PROCESS. PLEASE

20   RESPOND.

21

22   A.   I disagree. As I stated on Page 65 of my direct testimony, documentation

23   defects related to business rules for manual and electronic processes for

24   pre-ordering, ordering and maintenance are part of the CCP, and requests

25   for remedy for such defects can be submitted through the change request

1   process, either by the CLECs or by BellSouth. The development of

2   training materials and job aids for changes to these processes are

3   handled by the appropriate BellSouth training development organization

4   as the interfaces are enhanced through the CCP.

5

6 Q.   MR. BRADBURY FURTHER MAKES A POINT ABOUT AN EXCEPTION

7   REGARDING BELLSOUTH'S FAILURE TO DOCUMENT ITS TRAINING

8   PROCESS THAT WAS ISSUED BY KPMG AS PART OF THE FLORIDA

9   THIRD PARTY TEST. PLEASE COMMENT.

10

11 A.   KPMG's Exception 9 dealt with BellSouth's "failure to have documented

12   procedures for CLEC training management practices and program

13   administration." This is different from the actual training materials and

14   courses themselves, and has more to do with documentation issues

15   regarding such subjects as BellSouth's qualification criteria for instructors.

16   In other words, it is not about the training itself, but the types of things that

17   go on behind the scenes. BellSouth is currently formalizing those

18   procedures in response to the Exception, but the current lack of such is in

19   no way preventing CLEC training from being delivered, or otherwise

20   harming the CLEC community.

21

22   *e) defect correction, and*

23   *f) emergency changes*

24

1 Q. IN HIS TESTIMONY ON PAGE 72, MR. BRADBURY GROUPED THESE

2 TWO CATEGORIES TOGETHER – STATING THAT IT IS

3 APPROPRIATE TO DO SO – AND THAT ADOPTION OF AT&T'S

4 PROPOSED CHANGES WILL PROVIDE A DOCUMENTED DEFECT

5 CORRECTION AND EMERGENCY CHANGE PROCESS THAT MEETS

6 THEIR NEEDS. DO YOU AGREE WITH THAT?

7

8 A. Not entirely. As I stated in my direct testimony on Page 67, it was

9 BellSouth's understanding that the issue regarding the definition of a

10 defect had been resolved after the addition of language which addressed

11 AT&T concerns. Evidently AT&T's concerns continue to "evolve" as

12 BellSouth responds to AT&T's comments. In fact, BellSouth continues to

13 work to incorporate more of AT&T's suggested additions to the defect

14 definition regarding requirement defects.

15

16 BellSouth believes a process currently exists within the CCP to deal with

17 true emergencies, which are defined as system outages (Type-1 System

18 Outage). For the type of "emergency" to which AT&T refers – a high-

19 impact defect – BellSouth has agreed to an interval of two (2) business

20 days to develop and validate a workaround to remedy those situations

21 (See Exhibit RMP-36, Page 37, under Type-6 process flow). This

22 represents an improvement from the current four- (4) day interval. From

23 the point of development of a workaround, implementation of a true fix for

24 the validated high-impact defect would occur within a 4-to-25-business-

25 day range, with BellSouth committing to provide its best effort to minimize

1   the interval. BellSouth continues to work on improving this interval, but, at

2   the present time, can only commit to this improvement.

3

4   Mr. Bradbury further states on Page 73 that the "Draft Expedited Feature

5   Process" proposed by BellSouth is applicable neither to defect correction

6   nor emergency changes. That would be appropriate, since the updated

7   expedited feature process (Pages 28-32 of Exhibit RMP-36) is in response

8   to the CLECs' request that the expedited feature process be separated

9   from the defect correction (Type-6) process.

10

11   **g) an eight-step cycle, repeated monthly**

12

13   Q.   MR. BRADBURY STATES IN HIS TESTIMONY ON PAGE 74 THAT

14   AT&T CONCURS WITH THE NUMBER AND SEQUENCE OF STEPS

15   CONTAINED IN BELLSOUTH'S PROPOSED CCP DOCUMENT

16   VERSION 2.0, FOR TYPES 2-5 CHANGE REQUESTS, BUT SAYS THAT

17   AT&T STILL CONTINUES TO REQUEST REDUCED CYCLE TIMES.

18   HOW DO YOU RESPOND?

19

20   A.   BellSouth understands that AT&T has concurred in the number and

21   sequence of steps. BellSouth has also made its own proposals in regard

22   to the cycle times requested by AT&T in Mr. Bradbury's testimony on

23   Page 74, and, as is the case with the CCP "working version" document as

24   a whole (Exhibit RMP-37), BellSouth's proposals for this section are being

25   reviewed within the CCP.

1

While AT&T requests a reduction from 20 days to 10 days in the cycle

time to review change requests for acceptance, BellSouth has responded

that it feels that 20 days continues to be a reasonable and appropriate

cycle time in order to review the potential impact on other systems,

manual processes, documentation and training. Other steps include

determining if a change request already exists, determining if it is a CLEC

training issue, or determining if the request meets the criteria for an

expedited feature. BellSouth wants to ensure that appropriate front-end

planning occurs in order to minimize the possibility of defects later

The second cycle time Mr. Bradbury addresses involves a reduction from

30 to 25 days for the internal change management process step – the step

where BellSouth and the CLECs analyze impacts, sizing efforts, etc., for

change requests that have passed the CCP change request review

process and have been designated as candidates for implementation.

BellSouth has proposed a more workable solution (as outlined on Pages

27-28 of Exhibit RMP-37), since experience has shown that release

schedules may not coincide with the 30- or 25-day interval. BellSouth has

proposed that this step occur three-to-four months prior to a release – at

the Release Package Meeting – in an effort to allow consideration and re-

prioritization of new and/or non-scheduled change requests, without

jeopardizing release milestones.

1   ***h) a firm schedule for notifications associated with changes initiated***

2   ***by BellSouth***

3

4 Q.   MR. BRADBURY STATES ON PAGE 76 OF HIS TESTIMONY THAT

5   BELLSOUTH HAS REFUSED TO PROVIDE CLECS WITH DRAFT

6   SPECIFICATIONS RELATED TO BELLSOUTH-INITIATED CHANGES.

7   IS THAT TRUE?

8

9 A.   Definitely not. It is more likely that AT&T didn't receive specifications as

10   early as it would have liked. However, in BellSouth's proposed changes to

11   CCP document Version 2.1 (Exhibit RMP-37, Page 20) still under review,

12   BellSouth has addressed the notification schedule. BellSouth's proposed

13   changes are as follows: user requirements for software releases (90 and

14   45 days advance notification for draft and final requirements, respectively);

15   new Telecommunications Industry Forum ("TCIF") mapping (180 days

16   advance notification for implementation release date, and 120 and 60

17   days advance notification for draft and final requirements, respectively);

18   and retirement of interfaces (120 days advance notification for the

19   retirement of old *versions* of interfaces).

20

21   In addition to these software- and system-related notifications, BellSouth

22   has also proposed to provide *all* documentation 30 days in advance of the

23   implementation of a change, whether system-affecting or non-system-

24   affecting. Previously, non-system-affecting documentation changes were

25   provided five (5) days in advance.

1

2   *i) a process for dispute resolution including referral to state utility*

3   *commissions or courts*

4

5 Q.   ACCORDING TO MR. BRADBURY'S TESTIMONY ON PAGE 76, THIS

6   SUB-ISSUE SEEMS TO BE SATISFIED BETWEEN AT&T AND

7   BELLSOUTH. DO YOU AGREE?

8

9 A.   Yes, but it would appear that Mr. Bradbury's statement negates his own

10   claim that BellSouth has total control and veto power over the CCP, as he

11   claimed on Page 57 of his testimony, and as discussed earlier in this

12   rebuttal.

13

14   *j) a process for escalation of changes in process*

15

16 Q.   IN HIS TESTIMONY ON PAGE 77, MR. BRADBURY REFERS TO

17   SPECIFIC INTERVALS THAT AT&T HAS ADDED FOR VARIOUS

18   STEPS OF THE ESCALATION PROCESS. DO YOU OFFER ANY

19   REBUTTAL FOR THIS SUB-ISSUE?

20

21 A.   Not per se, but I would like to inform the Commission that BellSouth made

22   its own proposal for reasonable and doable intervals for the escalation

23   process that are currently incorporated in Exhibit RMP-36, Page 44. A

24   review of Page 51 of Exhibit RMP-37 will reveal that there remain some

25   minor changes in this section for consideration by the CCP sub-team.

1

2   ***k) testing support and testing environment***

3

4 Q.   ON PAGE 78 OF MR. BRADBURY'S TESTIMONY, HE COMPLAINS

5   THAT BELLSOUTH'S PROPOSED VERSION 2.O OF THE CCP

6   DOCUMENT DOES NOT CONTAIN AGREED-UPON LANGUAGE

7   REGARDING TESTING SUPPORT. PLEASE RESPOND.

8

9 A.   BellSouth has not included the language because the CLECs and

10   BellSouth have agreed to re-evaluate this section for additional language

11   modifications after the CLEC Test Environment has been implemented, as

12   noted on Page 60 of the Working Document (Exhibit RMP-37). As I

13   covered in depth in my direct testimony on this sub-issue, the Test

14   Environment will allow CLECs other options for testing prior to the

15   implementation of new releases to BellSouth's interfaces. To reiterate

16   from my direct testimony, the target date for implementation of the CLEC

17   Test Environment is March 31, 2001. There has been a slight alteration

18   from my original testimony, however, as I had indicated that beta testing

19   would have already occurred by that date. Beta testing now has been

20   targeted for April 7 through April 20, 2001, with general availability to the

21   CLEC community targeted for April 23, 2001.

22

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

24

1 Q.   MR. BRADBURY STATES ON PAGE 79 OF HIS TESTIMONY THAT

2   BELLSOUTH HAS AGREED TO PROVIDE THE TROUBLE NUMBER AS

3   AT&T HAS REQUESTED, BUT THE LANGUAGE IS NOT REFLECTED

4   IN VERSION 2.0. DO YOU AGREE WITH HIS STATEMENT?

5

6 A.   I do agree that BellSouth will provide the trouble ticket number to the

7   CLEC – a point that I covered in my direct testimony. However, that

8   language has been included in the new CCP document Version 2.1 (Page

9   18 of Exhibit RMP-36), and should satisfy Mr. Bradbury's concerns on this

10   sub-issue.

11

12   ***m) a process for the cancellation, rejection or reclassification of a***

13   ***CLEC change request***

14

15 Q.   AS YOU PREDICTED IN YOUR DIRECT TESTIMONY, MR. BRADBURY

16   ON PAGE 79 OF HIS TESTIMONY HAS RAISED THE ISSUE OF AT&T'S

17   CONCERN THAT BELLSOUTH HAS AN UNREASONABLE "UP-FRONT

18   VETO POWER OVER ANY CHANGE REQUEST SUBMITTED BY

19   CLECS," AND THAT CHANGE REQUESTS "SHOULD NOT BE

20   SUBJECT TO THE ARBITRARY CANCELLATION OR REJECTION BY

21   BELLSOUTH". WHAT IS YOUR RESPONSE?

22

23 A.   I simply reiterate what I said in my direct testimony about this sub-issue.

24   BellSouth has never acted irresponsibly upon CLEC change requests as

25   AT&T implies, and, although the wording has not been changed with the

1   adoption of CCP document Version 2.1 (Exhibit RMP-36), BellSouth is

2   conceptually receptive to AT&T's proposed changes. There are still some

3   wording differences to be fine-tuned, and this is one of the areas that

4   remains under discussion within the CCP. I have no reason to believe

5   that this sub-issue cannot be settled.

6

7   **n) a process for prioritization and assignment of change requests to**

8   **future releases for implementation**

9

10   Q.   AS WITH THE PREVIOUS SUB-ISSUE, MR. BRADBURY, ON PAGE 80

11   OF HIS TESTIMONY, CLAIMS THAT THE PRESENT CCP "IS DRIVEN

12   BY AN ARBITRARY RELEASE SCHEDULE DEVELOPED WITHOUT

13   INPUT FROM THE AFFECTED CLECS AND THE CCP," AND IMPLIES

14   THAT BELLSOUTH CONTROLS THAT PROCESS. PLEASE RESPOND.

15

16   A.   Again, I go back to my direct testimony response and re-state that I

17   disagree with the use of the terms "arbitrary" and "without input from the

18   affected CLECs and the CCP". That disagreement notwithstanding,

19   BellSouth believes that the concerns expressed in this sub-issue have

20   been addressed and that agreement has been reached. Unfortunately,

21   these Release Management items are part of a larger section of the CCP

22   document that is still open. Therefore, no updates containing the agreed

23   upon changes for this sub-issue have been posted.

24

25   **o) a process for changing the process**

1

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

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

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

1 A.   First, BellSouth would like the Commission to conclude that this matter

2   should be left to the collaborative process that BellSouth has shown to

3   exist. Second, as the Florida and Georgia Commissions have ordered

4   Third Party Testing, BellSouth proposes that the Commission allow that

5   process to determine the adequacy of the CCP, if it has any concerns

6   about simply leaving the matter to the existing CCP process. Finally, if the

7   Commission wants to go further, BellSouth requests that the Commission

8   view BellSouth's proposed changes to the CCP document Version 2.1

9   (now contained in the "working version") as the appropriate changes that

10   should be made to the existing CCP process.

11

12

13 *Issue 23: What should be the resolution of the following OSS issues*

14   *currently pending in the change control process but not yet*

15   *provided?*

16

17 Q.   IN HIS TESTIMONY ON PAGES 83-88, MR. BRADBURY CLAIMS THAT

18   BELLSOUTH HAS YET TO PROVIDE AT&T WITH OSS

19   FUNCTIONALITY TO SUPPORT THE QUALITY OF SERVICE ENJOYED

20   BY BELLSOUTH'S RETAIL CUSTOMERS, SPECIFICALLY AS IT

21   REGARDS: A) PARSED CUSTOMER SERVICE RECORDS; B) THE

22   ABILITY TO SUBMIT ORDERS ELECTRONICALLY FOR ALL SERVICES

23   AND ELEMENTS; AND, C) ELECTRONIC PROCESSING AFTER

24   ELECTRONIC ORDERING, WITHOUT SUBSEQUENT MANUAL

1   PROCESSING BY BELLSOUTH PERSONNEL. HOW DO YOU

2   PROPOSE TO RESPOND TO THESE CLAIMS FOR EACH SUB-PART?

3

4 A. Even though BellSouth continues to believe that this whole issue is

5   inappropriate for this arbitration because it is being addressed within the

6   CCP, I will address each of the sub-parts in the same order as Mr.

7   Bradbury has.

8

9   ***Sub-Part A) Parsed Customer Service Records***

10

11 Q. ON PAGES 84 AND 85 OF HIS TESTIMONY, MR. BRADBURY CLAIMS

12   THAT BELLSOUTH SHOULD PROVIDE PARSED CUSTOMER

13   SERVICE RECORDS FOR PRE-ORDERING PURSUANT TO INDUSTRY

14   STANDARDS, AND THAT AT&T MUST RE-ENTER THE SAME DATA

15   WHEN ORDERING, WHICH TAKES TIME AND COSTS EXTRA MONEY.

16   DO YOU AGREE?

17

18 A. No, I do not. As I presented in great detail in my direct testimony on

19   Pages 85-92, AT&T has the ability to parse customer service records

20   ("CSRs") to the sub-line level that it wants by doing the parsing on its side

21   of the interface. BellSouth provides the same data stream of CSR

22   information to CLECs –via the machine-to-machine Telecommunications

23   Access Gateway ("TAG") pre-ordering interface – which BellSouth

24   provides to its retail units. As detailed in my direct testimony, TAG is

25   based on the Common Object Request Broker Architecture ("CORBA")

1   industry standard. Further, as stated on Page 85 of my direct testimony,

2   the FCC has contradicted AT&T's interpretation of the Bell Atlantic New

3   York order by saying that "we have not previously stated that a BOC ["Bell

4   Operating Company"] must perform parsing on its side of the interface."

5   (AT&T Texas I Dalton/DeYoung Decl. at Para. 95) If AT&T feels that it

6   takes time and costs extra money for its service representatives to re-

7   enter data, perhaps that time and money should be invested in developing

8   the parsing capability on its side of the interface, as it is capable of doing.

9

10   With that said, and even though BellSouth's current position has been

11   supported by the FCC, an AT&T change request (TAG0812990003) for

12   parsed CSRs is currently being processed within the CCP, which is the

13   appropriate avenue and process for such a request. Because AT&T is

14   trying to use this arbitration proceeding to gain a Commission ruling

15   (thereby circumventing the CCP), mention of this change request has

16   been conveniently avoided by Mr. Bradbury.

17

18   However, as I mentioned in my direct testimony on Page 88-90 with

19   supporting documentation as Exhibits RMP-31, 32 and 33, there is a CCP

20   sub-team devoted to processing this change request, and there is a

21   targeted implementation of the parsed CSR feature during summer 2001.

22

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

24

1 Q. ON PAGES 85 & 86 OF HIS TESTIMONY, MR. BRADBURY CLAIMS

2 THAT BELLSOUTH RETAIL UNITS CAN PLACE ELECTRONIC

3 ORDERS FOR EVERY SERVICE AND PRODUCT THAT IT PROVIDES

4 ITS CUSTOMERS. PLEASE COMMENT.

5

6 A. It is inappropriate to compare BellSouth's retail interfaces for submitting

7 service requests for complex orders – which utilize a legacy system that is

8 not compatible with the industry-standard LSR format – to that of a CLEC

9 issuing a complex order via the LSR industry-standard format. The issue

10 is one of translations of an LSR-formatted request to a format that can be

11 accepted by BellSouth's Service Order Communications System ("SOCS")

12 for provisioning by further downstream BellSouth OSS legacy systems.

13 The interfaces utilized by BellSouth's retail units do not have to deal with

14 this translations issue because the service requests are built in a SOCS-

15 compatible format.

16

17 Mr. Bradbury's testimony also suggests that it is a simple matter for

18 BellSouth to electronically input *any* order for a BellSouth retail customer,

19 and that is not the case. While the ultimate electronic input for a BellSouth

20 retail complex order may be the result of a "single employee" typing it, as

21 he states on Page 88, requests for complex services are actually the

22 result of a team of employees working to develop the information

23 necessary for that "single employee" to input the service request. That

24 team might include the account team, system designers, network

25 specialists and other subject matter experts required for input of

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

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

1   Q.   MR. BRADBURY ALSO CLAIMS ON PAGE 86 THAT BELLSOUTH HAS

2   CONTINUALLY REFUSED TO PROVIDE FULLY ELECTRONIC

3   ORDERING CAPABILITY TO CLECS, THUS REDUCING THE CLECS'

4   ABILITY TO COMPETE. HOW DO YOU RESPOND?

5

6   A.   AT&T has not issued a change request asking for the electronic

7   submission of all Local Service Requests ("LSRs"), so it is unclear to

8   BellSouth how AT&T can say that BellSouth has continually refused that

9   capability. Because BellSouth adheres to the guidelines of the CCP,

10   BellSouth doesn't recognize a request for change to its OSS unless the

11   formal request comes through the CCP.

12

13   I would also like to reiterate my statement from my direct testimony that

14   nondiscriminatory access does not require that all LSRs be submitted

15   electronically, and that BellSouth's processes are in compliance with the

16   Telecommunications Act and the FCC rulings in that regard. AT&T's

17   contention that the competitive ability of CLECs is compromised because

18   all LSRs cannot be submitted electronically is unfounded and

19   unsubstantiated.

20

21   Q.   CAN YOU HELP PUT THIS ISSUE IN PERSPECTIVE BY DISCUSSING

22   THE PERCENTAGE OF ORDERS THAT ARE SUBMITTED

23   ELECTRONICALLY BY CLECS AS OPPOSED TO MANUAL

24   SUBMISSIONS?

25

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

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

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

1   A.   As I understand this issue, AT&T is requesting that all complete and

2   correct LSRs submitted electronically flow through BellSouth systems

3   without manual intervention.

4

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

6

7   A.   Nondiscriminatory access does not require that all LSRs be submitted

8   electronically and flow through BellSouth's systems without manual

9   intervention.

10

11   Q.   WHAT IS FLOW-THROUGH?

12

13   A.   Flow-through for a CLEC LSR occurs when the complete and correct

14   electronically-submitted LSR is sent via one of the CLEC ordering

15   interfaces (EDI, TAG, RoboTAG, or LENS), flows through the mechanical

16   edit checking and LESOG system, is mechanically transformed into a

17   service order by LESOG, and is accepted by the Service Order Control

18   System ("SOCS") without any human intervention.

19

20   Q.   HAS ANY CLEC SUBMITTED A CHANGE REQUEST REGARDING THIS

21   ISSUE TO THE CCP?

22

23   A.   No. To BellSouth's knowledge, no such change request has been

24   submitted to the CCP. As I have discussed previously, BellSouth's

25   position is that OSS issues subject to the CCP are not appropriate for this

1   arbitration. AT&T is attempting to avoid the CCP. All requests for

2   enhancements to BellSouth's electronic and manual interfaces should be

3   submitted via the CCP.

4

5 Q.   IS IT FEASIBLE FOR LSRS FOR ALL COMPLEX SERVICES TO BE

6   SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE

7   BELLSOUTH SYSTEMS?

8

9 A.   No. As I discussed in sub-part (B), many of BellSouth's retail services,

10   primarily complex services, involve substantial manual handling by

11   BellSouth account teams for BellSouth's own retail customers. The orders

12   at issue here are those that the CLEC may submit electronically, but fall

13   out by design. In most cases these orders are complex orders. For

14   certain orders, BellSouth has, for the ease of the CLEC, allowed them to

15   be submitted electronically even though BellSouth then manually

16   processes such orders. The specialized and complicated nature of

17   complex services, together with their relatively low volume of orders as

18   compared to basic exchange services, renders them less suitable for

19   mechanization, whether for retail or resale applications. Complex,

20   variable processes are difficult to mechanize, and BellSouth has

21   concluded that mechanizing many lower-volume complex retail services

22   would be imprudent for its own retail operations, in that the benefits of

23   mechanization would not justify the cost. Because the same manual

24   processes are in place for both CLEC and BellSouth retail orders, the

1   processes are competitively neutral, which is exactly what both the Act

2   and the FCC require.

3

4 Q.   DO COMPLEX ORDERS PROCESSED ON BEHALF OF BELLSOUTH

5   REQUIRE MANUAL INTERVENTION?

6

7 A.   Yes. As previously described herein and in my direct testimony, in the

8   case of service requests for complex services by CLEC or BellSouth end

9   users, there are systems designers and consultants involved in the work

10   flow between the CLEC or BellSouth representative who take the service

11   request and the person who inputs the service order into the system.

12   These designers and consultants clarify and expand on the information

13   from the end user customer as necessary to prepare the order for input.

14   Therefore, complex orders, even those that can be submitted

15   electronically, do not flow through because there is significant manual

16   intervention – the amount of which varies from order to order – between

17   the time order information is taken by the CLEC or BellSouth

18   representative and before the order is input.

19

20 Q.   ARE THERE OTHER REASONS FOR ORDERS TO FALLOUT BY

21   DESIGN THAN BEING A COMPLEX SERVICE?

22

23 A.   Yes. There are appropriate categories other than complex services for an

24   LSR to fallout by design for manual handling. All of these categories have

25   been identified in the Service Quality Measurements Performance Reports

1   document for the Percent Flow-Through Service Requests (Summary).

2   The document can be found at the password protected BellSouth

3   Performance Measurements Report website

4   (https://pmap.bellsouth.com/clec_specific_reports.cfm). One situation in

5   which it makes sense for LSRs to fall out by design is the result of the

6   decision not to program the Local Exchange Service Order Generator

7   ("LESOG") to handle a certain capability in advance of standards – e.g.,

8   partial migrations for other than conversion-as-is – or for products and

9   services for which CLECs order very low volumes. In cases of special

10 pricing plans that are unique to each CLEC, no automatic service order

11 generation is possible for such orders. Another example is when a CLEC

12 (or BellSouth) submits a service request before the new telephone number

13 for the end user has been posted to the billing system; in those situations

14 the request will appropriately fall out for manual handling.

15

16 Q.   ON PAGES 92-105 MR. BRADBURY DISCUSSES THE ALLEGED

17   IMPACT OF DESIGNED MANUAL FALL OUT AND BELLSOUTH-

18   CAUSED SYSTEM FAILURES. DO YOU AGREE WITH HIS

19   ASSESSMENT?

20

21 A.   No. This is the part of his testimony where Mr. Bradbury purports to use

22   numbers and figures to show the problems he asserts are raised by this

23   issue. Unfortunately, Mr. Bradbury has presented an elaborate, but

24   inconclusive approach utilizing regional flow-through data and it has led

25   him to the wrong conclusion. To better understand BellSouth's

1		performance one must "peel the onion" back and look at detail into the
2		numbers and actual LSRs submitted. Mr. Bradbury's process does not do
3		so. In all fairness, I have to say that in order to be thorough, which Mr.
4		Bradbury was not, one has to look at the actual data underlying the results
5		that are reported. Mr. Bradbury obviously does not have access to this
6		data and it is appropriate that he does not since it involves information
7		germane to other CLECs. Nevertheless, his conclusions based on
8		incomplete data are wrong and misleading and that is why he should
9		speak only to AT&T's experiences and supporting data if he wants to
10		make comments in this area.
11		
12	Q.	DO YOU AGREE WITH MR. BRADBURY'S PRESENTATION OF THE
13		DATA IN HIS ANALYSIS?
14		
15	A.	No. Mr. Bradbury has intentionally misrepresented the data for the month
16		of October 2000 to more favorably reflect his point of view in what is
17		already a faulty analysis process. Specifically, Mr. Bradbury has taken the
18		data reflected in the report column for "Pending Supps" and added this to
19		the data reflected in the report column for "Total Manual Fallout" and used
20		this sum as the amount for Total Manual Fallout. Attached, as Exhibit
21		RMP-38, is the PERCENT FLOW-THROUGH SERVICE REQUESTS
22		report for October 2000. This is commonly referred to as the 'flow-
23		through' report and is made available publicly via BellSouth's performance
24		measures website. Please refer to page 20 of this report. On this page
25		you will note the summary information which as noted at the top of the

page is for the 'BUSINESS DETAIL'. Now please compare this to Exhibit

JMB-33 filed in Mr. Bradbury's direct testimony. On page 3 of Mr.

Bradbury's exhibit, the last 3 columns represents a snapshot of some of

the summary data from page 20 of the flow-through report.   A comparison

of the data is noted below.

<u>Manual Fall-Out</u>

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

The difference in the amounts can be found in the 'Pending Supps'

column of the flow-through report. That column reflects the following:

<u>Pending Supps</u>

LENS	236
TAG	17
EDI	114

Q.   WHAT ARE 'PENDING SUPPS'?

1   A.   Pending Supps is short for Pending Supplements. A Pending Supplement

2   is the result of a LSR that has been submitted by a CLEC being changed

3   (supplemented) by the CLEC prior to acceptance by BellSouth. It results

4   in the initially submitted LSR going into a pending status as the

5   mechanical systems have recognized the subsequent LSR submittal. The

6   LSR in the pending status will eventually be mechanically deleted by the

7   system. These deleted LSRs are being categorized for purposes of flow-

8   through as Pending Supps.

9

10   Q.   HAS BELLSOUTH ALWAYS HAD THE CATEGORY 'PENDING SUPPS'

11   ON THE FLOW-THROUGH REPORT?

12

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

14

15   Q.   WHAT PROMPTED THIS CHANGE TO THE REPORT?

16

17   A.   This is the result of an exception as part of the Third Party Testing being

18   conducted in Georgia. KPMG[1] identified this as an exception during their

19   reconciliation of the flow-through report. Initially these pending LSRs were

20   being identified as a CLEC error. As a result of the KPMG Third Party

21   Testing exception, BellSouth re-categorized these LSRs as a BellSouth

22   caused error. However, KPMG did not agree with that categorization as it

23   was felt these LSRs were not an error on the part of the CLEC or

---

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

1   BellSouth. Instead, these LSRs are just a part of the process. So a new

2   category (Pending Supps) was created to properly categorize the LSRs.

3

4   Q.   SO THESE 'PENDING SUPPS' LSRS HAVE NEVER BEEN COUNTED

5   AS PART OF 'TOTAL MANUAL FALLOUT' FOR FLOW-THROUGH?

6

7   A.   That is correct. As I just described, these LSRS at one time were CLEC

8   errors and then were re-categorized as BellSouth errors, but they have

9   never been categorized as 'Manual Fallout'.

10

11 Q.   WAS THIS CHANGE TO THE FLOW-THROUGH REPORT

12   COMMUNICATED TO THE CLECS?

13

14 A.   Yes. As previously stated, the monthly flow-through report is made

15   available publicly to the CLECs via BellSouth's performance measures

16   website. With the posting of this report in September, a notice of this

17   change was also posted to the performance measures website.

18

19 Q.   ARE THERE OTHER ISSUES WITH MR. BRADBURY'S ANALYSIS OF

20   THE FLOW-THROUGH REPORT DATA?

21

22 A.   Yes. Using October 2000 as an example, there were 325,034 LSRs [2]

23   submitted electronically to BellSouth. To understand this data and the

---

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

1   impact it has on flow-through, one must have a thorough understanding of

2   the individual CLEC data comprising the total.

3

4 Q.   CAN YOU ILLUSTRATE WHY LOOKING AT INDIVIDUAL CLEC DATA IS

5   NECESSARY FOR A THOROUGH ANALYSIS AND UNDERSTANDING

6   OF MR. BRADBURY'S EXAMPLE?

7

8 A.   Yes. For sake of illustration let us use the PERCENT FLOW-THROUGH

9   SERVICE REQUESTS (BUSINESS DETAIL) report for October 2000.

10   The specific report used for this discussion is attached as Exhibit RMP-38.

11   Pages 16-20 are the pages specific to the business flow-through report.

12

13   By conducting a detailed review of the report, one can identify 145 users[3]

14   of the LENS electronic interface based on the number of individual

15   horizontal lines of data presented. There are also 5 users of the EDI

16   interface and 18 users of the TAG interface. From further review it can be

17   determined that there were 7 users of LENS that submitted 500 or more

18   LSRs. I will refer to these as the seven dominant users of LENS. For EDI

19   there is only one dominant LSR volume user of EDI and for TAG there are

20   two dominant LSR volume users. For LENS the seven dominant users

21   submitted 5,412 LSRs. That accounted for 40% of the total business

22   resale LSRs submitted and 50% of the volume for the LENS interface

23   alone. For EDI the one user submitted 1,623 LSRs. That accounted for

---

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

1   12% of the total business resale LSRs submitted and 99% of the volume

2   for the EDI interface. For TAG, the dominant users submitted 777 LSRs.

3   That accounted for 6% of the total resale business LSRs submitted and

4   66% of the volume for the TAG interface. The combination of these ten

5   users represents 57% of the overall business resale LSR volume

6   submitted via the electronic interfaces. This is over one-half of the

7   electronic LSR business resale submissions.

8

9   The data presented above is summarized in the following table.

10

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

11

12

13   Q.   WHAT IS THE SIGNIFICANCE OF TEN USERS COMBINING FOR

14   OVER ONE-HALF OF THE LSR BUSINESS RESALE VOLUME?

15

16   A.   Obviously when such a large percentage of the volume comes from such

17   a small number of the users, then the overall results for that area will be

18   skewed by the performance of those few users. That is specifically the

19   case for this situation.

20

1 Q. ARE THERE OTHER DATA WITH RESPECT TO THESE USERS THAT

2 HAVE IMPACT ON THE OVERALL RESULTS?

3

4 A. Yes. These same ten users combine for 2,619 LSRs that fall out by

5 design for manual processing. That represents 67% of the total manual

6 fall out. For their respective electronic interfaces, the seven users of

7 LENS account for 53% of the manual fall out for the LENS interface, the

8 user of EDI accounts for 99% of the manual fall out for the EDI interface,

9 and the two users of TAG account for 73% of the manual fall out for the

10 TAG interface.

11

12 Q. IS THERE A SPECIFIC REASON THESE CERTAIN USERS ARE

13 EXPERIENCING SUCH A HIGH MANUAL FALL OUT?

14

15 A. Yes. Once again the data is private and proprietary, but this fact goes to

16 demonstrate how incomplete knowledge can lead to incorrect conclusions.

17 Without identifying the users or providing any identifying or proprietary

18 information, I can state that the majority of the manual fall out for two of

19 the ten dominant users is the result of one particular service which they

20 resell to their end users. I know this as I personally reviewed their

21 situation for this analysis.

22

23 Q. HAS BELLSOUTH DONE ANYTHING TO THE FUNCTIONALITY OF

24 THE ELECTRONIC INTERFACES SPECIFIC TO THE SERVICE IN

25 QUESTION?

1

2   A.   Yes. With the January 14, 2000 implementation of Release 6.0 of EDI

3   and Releases 3.0 and 3.1 of TAG (available for System Readiness

4   Testing on December 18, 1999), functionality was made available for this

5   particular service to flow through BellSouth's systems. In other words, the

6   service in question no longer falls out by design for manual handling.

7

8   Q.   SINCE THESE RELEASES WERE IMPLEMENTED IN JANUARY 2000,

9   WHY ARE THESE USERS STILL EXPERIENCING SUCH A RATE OF

10   MANUAL FALL OUT?

11

12 A.   This result is because these users have yet to implement these releases.

13   The timing of release implementation is controlled by the CLEC based on

14   its individual business needs and decisions. Obviously anyone reviewing

15   the public data would not know this and therefore could draw the wrong

16   conclusions from the public data, as Mr. Bradbury did. This points, of

17   course, to the need to be careful what conclusions you draw from

18   incomplete information.

19

20 Q.   WOULD THERE BE ANY DIFFERENCE IN THE RESULTS BASED ON

21   MR. BRADBURY'S PROCESS HAD THESE USERS IMPLEMENTED

22   THE RELEASES?

23

24 A.   Yes. The results would reflect a difference. To illustrate I have used a

25   conservative figure of 50% of the manual fallout reflected in the flow-

1   through just for these two users being able to flow through the systems.

2   This is based on the assumption that these users implemented the

3   Release 6.0 of EDI and Releases 3.0 and 3.1 of TAG. It also applies the

4   assumption just as Mr. Bradbury did in his assessment that the users

5   submitted service requests with absolutely no input errors. The results for

6   the business resale for the EDI and TAG interfaces would change as

7   noted below. Note that I have changed the AT&T results for 'Manual Fall

8   Out' to properly represent the numbers by subtracting the 'Pending Supps'

9   LSRs for the reasons described earlier in my testimony.

10

		Assessment by AT&T		Assessment by BellSouth	
		TAG	EDI	TAG	EDI
14	Total Mech LSRs	1180	1644	1180	1644
15	Manual Fall Out	483	969	337	488
16	Validated LSRs	445	447	592	928
17	BellSouth Caused System Failure	128	113	128	113
18	Flow-through Issued SOs	257	250	404	731
19					
20	% Manual Fallout – LSRs	41%	59%	29%	30%
21	% BellSouth System Failure – LSRs	11%	7%	11%	7%
22	% BellSouth System Failure – VLSRs	29%	25%	22%	12%
23					
24	% Total BellSouth Fallout + Failure – LSRs	52%	66%	39%	37%
25	% Maximum One-Touch CLEC Orders	47%	27%	59%	57%

1

2   Once again, this chart is for illustrative purposes only to show the impact

3   of a failure to properly analyze the relevant data. As I stated above, this

4   chart represents the impact of LSRs submitted by only two CLECs. This

5   chart is in no way indicative of the actual October 2000 flow-through

6   results.

7

8   Q. WHAT IMPACT WOULD THE ABOVE ILLUSTRATION HAVE ON THE

9   BUSINESS RESALE FLOW-THROUGH RESULTS AS REPORTED BY

10   BELLSOUTH FOR OCTOBER 2000?

11

12 A. For EDI business resale the results would have improved to 86.6% from

13   the currently reported result of 68.9%. For TAG the result would have

14   improved to 75.9% from the currently reported 66.8%.

15

16 Q. ARE THERE OTHER DATA THAT INFLUENCES THE FLOW-THROUGH

17   RESULTS THAT MR. BRADBURY DID NOT CONSIDER FOR HIS

18   ANALYSIS?

19

20 A. Yes. The above reflects the impact on only one area – business resale

21   flow-through. Even for this one area in my analysis, I gave no

22   consideration to the few CLECs that dominate the LSR volume submitted

23   via the LENS interface. As previously stated, there are seven (7) users of

24   the LENS interface that contribute to 40% of the total LSR submissions for

25   business resale and another 34% of the total manual fallout. These seven

1   users represent 50% of the LENS business resale volume and 53% of the

2   LENS manual fallout. One can combine these seven with the one

3   dominant user of EDI and the two dominant users of TAG discussed

4   earlier and easily conclude that 10 of 168 users (6% of the users) of

5   electronic interfaces drive the flow-through results. Once again, these 10

6   combined for business resale LSRs that accounted for over one half

7   (57%) of the volume submitted during the month of October 2000. If

8   further analysis of these seven LENS users and the other two users of

9   TAG were conducted, it would obviously impact the results further from

10   what I have previously presented. Similar correlation can be made to the

11   UNE and LNP flow-through reports, as there were sixty-four (64) users of

12   the electronic interfaces for UNE LSRs and twenty (20) for LNP in October

13   2000. One user accounted for 80% of the UNE LSR submissions and two

14   users accounted for 66% of the LNP LSR submissions.

15

16   Q.   PLEASE SUMMARIZE CONCLUSIONS FROM YOUR ASSESSMENT.

17

18   A.   A small number of CLECs are the dominant volume users of the electronic

19   interfaces. Therefore, the flow-through results of these few CLECs skews

20   the overall results. If these CLECs do not implement the latest software in

21   which BellSouth has implemented the CLEC requested features, the

22   overall results will not properly represent the current state of functionality

23   capabilities existing for the electronic interfaces. That is the situation that

24   exists today.

25

1 Q. WHAT EFFORTS ARE UNDERWAY WITHIN BELLSOUTH TO IMPROVE

2   FLOW-THROUGH PERFORMANCE?

3

4 A. BellSouth is currently forming a joint BellSouth/CLEC Flow-through

5   Improvement Task Force as directed by the Georgia Public Service

6   Commission in its recent performance measurements order [GPSC

7   Docket No. 7892-U, January 12, 2001]. The purpose of this task force is

8   to identify and implement enhancements that will improve the flow-through

9   performance of electronically submitted LSRs. It is BellSouth's proposal to

10   handle this task force under the CCP, and a notification regarding the

11   formation of the task force was sent to all registered CCP members on

12   February 15, 2001. That notice is provided as Exhibit RMP-39.

13

14 Q. ON PAGES 103 AND 104 OF HIS TESTIMONY, MR. BRADBURY

15   IMPLIES THAT THE DURATION OF THE TIME BETWEEN LSR

16   FALLOUT AND THE TIME THAT AN LCSC REPRESENTATIVE

17   'CLAIMS' THAT LSR TO HANDLE IT IS UNREASONABLE. PLEASE

18   COMMENT.

19

20 A. While the issue being raised by Mr. Bradbury deals more with

21   performance metrics, I will nonetheless offer several responses to his

22   claim. BellSouth has been addressing this issue for a number of months

23   in anticipation of the aforementioned Georgia Public Service Commission

24   order related to performance metrics – specifically those for reject interval

25   for partially mechanized and non-mechanized LSRs, and for Firm Order

1   Confirmation ("FOC") timelines for partially mechanized and non-

2   mechanized LSRs. The order puts the target metrics for these categories

3   as follows:

4   Partially Mechanized Rejects and FOC Intervals

5   85% within 18 hours within 3 months of order

6   85% within 10 hours within 6 months of order

7   Non-Mechanized Rejects

8   85% within 24 hours (Effective with the Order filing date)

9   Non-Mechanized FOC

10   85% within 36 hours (Effective with the Order filing date)

11

12   BellSouth has responded previously to this issue in a similar AT&T

13   arbitration proceeding filed before the Florida Public Service Commission

14   [FPSC Docket No. 000731-TP], and as a result of a FPSC Staff

15   interrogatory, provided as Exhibit RMP-40. To summarize that response,

16   BellSouth has trained and added new employees in both the Atlanta and

17   Birmingham Local Carrier Service Centers ("LCSCs"), and has opened a

18   third center in Jacksonville to improve overall operational processing

19   performance.

20

21   Our efforts are already reaping rewards, as pointed out to AT&T in our

22   response to its letter requesting a root cause analysis on the FOC

23   timelines for partially mechanized and non-mechanized LSRs. The AT&T

24   request letter and our response are provided together as Exhibit RMP-41.

25   Our response indicated that, while BellSouth did not meet benchmark

1   FOC intervals of 85% returned FOC within 48 hours during most of 2000

2   for the two categories, the current trend shows a positive improvement in

3   both categories. In fact, the December 2000 results show a 95%

4   performance less than 48 hours for partially mechanized LSRs, and 98%

5   performance less than 48 hours for non-mechanized LSRs.

6

7   Q.   PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 23.

8

9   A.   I will summarize Issue 23 as follows:

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

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

12   This is an active element before the CCP and will be resolved

13   there.

14   3)   Nondiscriminatory access does not require that all LSRs be

15   submitted electronically. Some of BellSouth's services, primarily

16   complex services, require involve manual handling.

17   4)   BellSouth is providing nondiscriminatory access for CLECs to its

18   OSS functions. Nondiscriminatory access does not require that all

19   LSRs be submitted electronically and flow through BellSouth's

20   systems without manual intervention.

21

22

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

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

25   ***WFA?***

1

2 Q. ON PAGE 107, MR. BRADBURY STATED THAT "FOR MANY (BUT NOT

3 ALL) SERVICES ASSOCIATED WITH A TELEPHONE NUMBER,

4 BELLSOUTH OFFERS ACCESS TO ITS PROPRIETARY TROUBLE

5 ANALYSIS FACILITATION INTERFACE (TAFI)". DO YOU AGREE?

6

7 A. No. The CLEC can use TAFI to enter a trouble report for ALL telephone

8 number- (TN) based services. The objective of TAFI is to 'screen' (test,

9 analyze, repair or route) each trouble report before entering the report into

10 the LMOS. As pointed out in Section 3.2 (Limitations) of the CLEC-TAFI

11 User Guide (Issue 5), there are a few TN-based services that TAFI does

12 not screen. However, the user can still enter the report and manually

13 route it to a Maintenance Administrator for screening. This functionality is

14 exactly the same for the version of TAFI used by BellSouth's retail units.

15 (Note: Section 3.2.1 of the Guide indicates that stand-alone UNE ports are

16 not supported in TAFI. This item is now inventoried in LMOS and

17 supported by TAFI, and the next issue of the Guide will remove this

18 statement.)

19

20 Q. ON PAGE 108, MR. BRADBURY PRESENTS HIS ARGUMENT THAT

21 NEITHER TAFI NOR ECTA PROVIDES NONDISCRIMINATORY

22 ACCESS TO BELLSOUTH'S OSS FOR MAINTENANCE AND REPAIR.

23 DO YOU AGREE WITH HIS ASSESSMENT?

24

1   A.   No. The Telecommunications Act requires ILECs to provide CLECs with

2   the ability to enter trouble reports into the ILECs' OSS in substantially the

3   same time and manner as is enjoyed by the ILECs' personnel entering

4   trouble reports into the OSS. Thus, 'same time' equates to response time,

5   and 'same manner' equates to access to the same functionality. The

6   response time and functionality of CLEC-TAFI is the same as the version

7   of TAFI used by BellSouth's retail units. (Actually the CLEC-TAFI

8   functionality is superior to BellSouth's TAFI since it can process both

9   Residence and Business trouble reports on the same processor.)

10   Therefore, CLEC-TAFI provides nondiscriminatory access to BellSouth's

11   OSSs.

12

13   BellSouth also supports interfaces built to National standards and for

14   Maintenance and Repair functions, this interface is ECTA. The

15   functionality of ECTA is limited by the national standards to providing the

16   CLEC the ability to: (1) enter a trouble report; (2) modify an existing

17   trouble report; (3) close an existing trouble report; (4) obtain trouble report

18   status information; and, (5) obtain mechanized loop test ("MLT") data on a

19   line without entering a trouble report. BellSouth does not use ECTA

20   internally to submit trouble reports to its OSSs so there is not an

21   analogous BellSouth retail process for comparison of the response time

22   and functionality. However, the response time and functionality of ECTA

23   are clearly defined in the ECTA Joint Implementation Agreement (JIA)

24   which is agreed to by each CLEC using ECTA. (AT&T agreed to and

25   signed an ECTA JIA in 1997.) The current "boiler plate" JIA is available

1   on the web at

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

3

4   Mr. Bradbury contends that "when a CLEC submits a trouble report via

5   TAFI, that order must be manually entered into the CLEC's own internal

6   OSS". Please note that the Telecommunications Act does not require the

7   CLEC to enter a report into its own OSS. It only addresses the ILECs'

8   responsibility of providing nondiscriminatory access to its OSS. Therefore,

9   performing "costly and error-prone double entry" (for trouble reports) is a

10   business decision of the CLEC and is not a requirement of the

11   Telecommunications Act. Hence, this does not impact the definition of

12   nondiscriminatory access.

13

14   Q.   IN YOUR PREVIOUS ANSWER, YOU INDICATED THAT ECTA IS BUILT

15   TO NATIONAL STANDARDS. WHO DEFINES THESE NATIONAL

16   STANDARDS TO INSURE THAT THE NEEDS OF THE CLECS ARE

17   ADDRESSED?

18

19   A.   ECTA is built to the American National Standards Institute's (ANSI)

20   standards. The Electronic Communications Implementation Committee

21   (ECIC) developed these standards. The ECIC is a subcommittee of the

22   Telecommunications Industry Forum ("TCIF"), which was established to

23   foster the implementation of electronic communications, particularly with

24   regard to trouble administration. AT&T and BellSouth (along with most

25   ILECs and interested CLECs) have active participation in ECIC activities

1   including the establishment of new standards. Therefore, through ECIC,

2   CLECs have the ability to define ECTA functionality.

3

4   Q.   ON PAGE 108, MR. BRADBURY INDICATED THAT "CLEC'S CANNOT

5   INTEGRATE TAFI WITH THEIR OWN 'BACK OFFICE' SYSTEMS AS

6   BELLSOUTH DOES". IS HE CORRECT?

7

8   A.   No. TAFI cannot be integrated for either user community. TAFI is a front-

9   end human-to-machine user interface that obtains data from various OSSs

10   in order to test, analyze, repair or route a given trouble report. BellSouth's

11   OSSs are not dependent upon TAFI for their operation. If TAFI were

12   pulled from the infrastructure, the remaining systems (i.e., LMOS, CRIS,

13   Predictor, MARCH) would work fine. Therefore, TAFI is not integrated

14   with these systems – it only accesses these systems.

15

16   Once the proper determination is made, TAFI enters the trouble report into

17   LMOS for subsequent processing. (If the trouble condition was resolved,

18   TAFI would enter, and then close, the LMOS report.) This is true

19   regardless of the party that generated the trouble report – the CLEC or

20   BellSouth. Although LMOS is BellSouth's maintenance OSS, CLECs

21   using TAFI have the ability to view LMOS trouble status and LMOS trouble

22   history data for specific end-users just like BellSouth users can. The

23   argument for double-entry was addressed earlier and remains moot.

24

1   The statement made by BellSouth in the Louisiana 271 application before

2   the FCC was misinterpreted by AT&T. The statement "BellSouth

3   concedes that it derives superior integration capabilities from TAFI" means

4   that TAFI obtains data from various OSSs for a given trouble condition

5   and then mechanically integrates this information to form the analysis

6   determining the correct course of action to effect a repair. TAFI's

7   capability of "automatically interacting with other systems as appropriate"

8   is correct for both CLEC-TAFI and the version of TAFI used by BellSouth's

9   retail units. This statement just means that TAFI obtains data from the

10   appropriate OSSs for a given trouble condition. For example, if the

11   customer were reporting no dial tone, TAFI would execute an MLT to

12   check the line. For this report, TAFI would <u>not</u> verify features programmed

13   in the central office switch. On the other hand, if the customer indicated

14   that their Call Waiting feature didn't work, TAFI would <u>not</u> execute an MLT.

15

16 Q. ON PAGE 109, MR. BRADBURY PROVIDES HIS ARGUMENTS FOR A

17   'FULL FUNCTION MACHINE-TO-MACHINE MAINTENANCE AND

18   REPAIR INTERFACE'. WHAT COMMENTS DO YOU HAVE?

19

20 A. Mr. Bradbury says, "if a CLEC wants to issue credits to a customer who

21   had experienced recurring repairs, it would need access to billing data and

22   repair histories." BellSouth's OSSs only track what items were sold to the

23   CLECs and <u>not</u> what the CLEC sold to their end user and for what price.

24   Therefore, the CLEC must rely on its <u>own</u> billing system. Trouble history

25   data has been available via TAFI since its introduction. (Note: ECIC is

1   currently evaluating a methodology for obtaining Trouble History data over

2   ECTA. Once the standard is approved, BellSouth will deploy it if

3   requested to do so by those CLECs using the interface.)

4

5   Mr. Bradbury further states on Page 110 that "CLECs must be able to add

6   or change service and adjust calling plans for customers, and require

7   access to customer service record information to keep contact information

8   up-to-date." Adding or changing service is the result of provisioning

9   initiated by the submission of a service request, which is part of the

10   ordering process. Accessing customer service record data is available via

11   the pre-ordering process. Both pre-ordering and ordering functions are

12   mechanically available via the machine-to-machine electronic interface

13   called Telecommunications Access Gateway ("TAG").

14

15   Using Mr. Bradbury's numbers from Page 110, 30 months after market

16   entry (and using a 6%-per-month trouble rate), 60,000 repair calls per

17   month indicates an installed base of 1,000,000 lines for AT&T in

18   BellSouth's area. As information, BellSouth's retail units process between

19   1.5 and 2.0 *million* TAFI reports per month with no problems.

20

21   To avoid the 'double-entry' problem to which Mr. Bradbury keeps referring,

22   AT&T could re-establish their use of ECTA and enjoy the functionality

23   provided by the National Standards. As information, AT&T was the first

24   CLEC to build an interface to BellSouth's ECTA system. That interface

1   went into production on March 18, 1998. On April 9, 1998 (three weeks

2   later), AT&T suspended the service.

3

4   Q.   ON PAGE 111, MR. BRADBURY RECOUNTS AT&T'S NUMEROUS

5   REQUESTS FOR BELLSOUTH TO PROVIDE FULL TAFI

6   FUNCTIONALITY OVER THE ECTA INTERFACE. PLEASE PROVIDE

7   YOUR COMMENTS ON THIS TOPIC.

8

9   A.   AT&T requested that BellSouth provide full TAFI functionality via the

10   ECTA interface on numerous occasions. BellSouth agrees that providing

11   enhanced functionality via a machine-to-machine interface would be

12   attractive to the CLEC community. However, ECTA is not the vehicle to

13   deliver this functionality since it adheres to the National standards for

14   exchanging maintenance and repair information – and these standards do

15   not support all of the data elements required (A 'data element' is defined

16   as a specific field of information in a data transmission. For example,

17   ANSI standard 262 defines the methodology for obtaining results of a

18   mechanized loop test, and the corresponding string of data bits containing

19   those results is the MLT data element.). In addition, the standards do not

20   provide a vehicle for BellSouth to deliver the interactive dialogue and

21   analysis rules required for TAFI functionality.

22

23   On Page 112, Mr. Bradbury misrepresents issues regarding the Georgia

24   PSC Order, Docket No. 6352U (July 2, 1996). At line 6, he says,

25   "BellSouth stated that it 'has investigated the possibility of adding to the

existing [EBI] gateway a system called TAFI'". What BellSouth actually said was that it had investigated the possibility of adding its internally developed and proprietary system called TAFI to the list of interfaces available to CLECs to report their end-user trouble reports. At that time, BellSouth did not have the ECTA maintenance and repair interfaces available for CLECs. However, special development work would have to be done to TAFI (i.e., ensuring that a given CLEC could only access records pertaining to their customers, etc.) before it could be made available to the CLEC community. Beginning at line 9, he further states that the "Georgia PSC ordered BellSouth to complete 'the TAFI enhancements to allow full operation of the required access by March 31, 1967'". While BellSouth thinks Mr. Bradbury meant 19**97**, this order was to make TAFI available to CLECs and **not** to put TAFI functionality into ECTA. BellSouth satisfied this Georgia PSC order on March 28, 1997 when the first CLEC generated a trouble report via CLEC-TAFI.

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

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

2   development.

3

4   Also on page 113, Mr. Bradbury states that "AT&T submitted a formal

5   change request through the Interim Change Control Process on April 18,

6   2000, asking for TAFI functionality via the ECTA interface". BellSouth

7   replied to this request on June 29, 2000 (Provided as Exhibit RMP-42) and

8   explained in detail why it was not possible to implement this request.

9

10   Q.   ON PAGE 114, MR. BRADBURY IMPLIES THAT PROVIDING

11   ADDITIONAL FUNCTIONALITY OVER THE ECTA INTERFACE DOES

12   NOT VIOLATE THE NATIONAL STANDARDS. WOULD YOU PLEASE

13   PROVIDE BELLSOUTH'S INTERPRETATION OF THAT POSITION?

14

15   A.   BellSouth has always supported national standards for the exchange of

16   information with the CLEC community. For maintenance and repair

17   functions, large CLECs (those dealing with multiple ILECs) benefit by

18   using a machine-to-machine system built to these standards because their

19   one interface will properly interact with the multiple ILEC systems –

20   assuming the other ILECs also support these national standards.

21

22   BellSouth agrees that providing system functionality over and above the

23   national standards does not by itself violate the standards. However, by

24   doing so would change the scope of ECTA, and ECTA would no longer be

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

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

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

1   requirements for a Trouble Administration interface, as defined in the

2   AT&T document "Fault Management - Electric Bonding Interface for Local

3   Service" (March 7, 1997), were accommodated.

4

5   The AT&T/BellSouth Interconnection agreement further states that *"Where*

6   *a function is not presently supported for a given Network Element, the*

7   *Parties agree to work collaboratively <u>within the industry</u> for its inclusion in*

8   *<u>future releases of the standards</u>."* In other words, if "additional

9   functionality" is needed, the party wanting this functionality would work

10   'within the industry' (ECIC) to develop enhancements to the existing

11   standards (or generate a new standard) to achieve the desired result.

12   Once the new standard is developed, BellSouth would implement it in its

13   ECTA interface. (Note: A number of CLECs wanted the ability to obtain a

14   mechanized loop test on a given line without generating a trouble report.

15   BellSouth took the lead at ECIC and – working 'within the industry' –

16   helped to develop ANSI standard T1.262-1998. This new functionality is

17   now deployed in BellSouth's ECTA interface.)

18

19 Q.   STARTING ON PAGE 115, MR. BRADBURY PROVIDES HIS

20   COMMENTS REGARDING AN INFORMAL PRESENTATION MADE BY

21   BELLSOUTH AT THE OCTOBER 25, 2000 CHANGE CONTROL

22   STATUS MEETING. PLEASE PROVIDE YOUR COMMENTS.

23

24 A.   Mr. Piatkowski (BellSouth) used this forum to share the status of several

25   development initiatives that *may* someday have an impact on the CLEC

1   community. The intent was to provide the audience with a preview of what

2   *may* become available. As stated by Mr. Bradbury, Mr. Piatkowski

3   discussed three systems: DLEC-TAFI, CPSS-TA and E-Repair. Mr.

4   Piatkowski was very deliberate in his presentation to state that BellSouth

5   was developing CPSS-TA and E-Repair for the non-CLEC user

6   communities and that these systems *may* be extended to support the

7   CLEC community in the future. DLEC-TAFI was specifically developed for

8   the Data Local Exchange Carrier (DLEC) community that uses the line-

9   sharing technique for delivering access to high-speed data transmission.

10

11   Mr. Bradbury's comments on lines 11 through 16 on page 115 are

12   incorrect. DLEC-TAFI is not a unique system. It is an enhancement to the

13   CLEC-TAFI system. By definition, a DLEC is a type of CLEC that

14   provides high-speed data through the line-sharing methodology. This

15   CLEC-TAFI enhancement **does not** support BellSouth's retail ADSL

16   product line **nor** does it support CLEC xDSL trouble reports. There has

17   **never been** a retail version "available to BellSouth for some time but is

18   only now being demonstrated to C/DLECs." This CLEC-TAFI

19   enhancement was developed at the request of the DLEC Collaborative - a

20   group of DLECs working with BellSouth on line-sharing.

21

22   Mr. Bradbury's comments regarding CPSS-TA (the Circuit Provisioning

23   Status System – Trouble Administration) on page 115 are correct. The

24   interexchange carrier user pilot was successful and BellSouth has

1   targeted an offering for CPSS-TA to the CLEC community during the first

2   quarter of 2001.

3

4   The future evolution of E-Repair is unknown at this time. Mr. Piatkowski

5   indicated that the initial version of this system – built for BellSouth's large

6   retail customers – would only provide a view of trouble-report status

7   information (from both LMOS and WFA) via the Internet. The pilot for this

8   initial system, using several select retail customers, began in January

9   2001. The results of this trial will determine its future. Assuming that the

10 trial is successful and E-Repair becomes a viable product, CLECs would

11 have access.

12

13 The E-Repair developers are looking at the possibly of expanding the

14 functionality of the system to include trouble entry. If this effort is

15 approved (and funded), it would be a "Phase-II" initiative. Since E-Repair

16 accesses both LMOS and WFA, and **if** BellSouth expanded its

17 functionality to include trouble entry, then it would be logical to migrate

18 CLEC-TAFI and CPSS-TA users to a single system. However, there are

19 no firm plans for E-Repair beyond the initial pilot.

20

21 Q.   ON PAGE 117, MR. BRADBURY EXPRESSES SOME CONCERN OVER

22   THE PROCESS USED TO DEVELOP DLEC TAFI, CPSS-TA AND E-

23   REPAIR. WHAT COMMENTS DO YOU HAVE?

24

1 A. As Mr. Piatkowski pointed out, the CPSS-TA and E-Repair initiatives were

2 developed for non-CLEC user communities and, therefore, the

3 development of those systems are not subject to the (CLEC) Change

4 Control Process. When – and if – these systems are made available to

5 CLECs, CLECs will certainly have the ability to submit suggestions for the

6 system's evolution.

7

8 The DLEC enhancements to TAFI were developed at the request of

9 DLECs participating in the DLEC Collaborative meetings at BellSouth.

10 The DLEC Collaborative is an ad hoc subcommittee of the CCP. The

11 participating DLECs are also members of the CCP, and had no issue with

12 this development taking place within the DLEC Collaborative. In fact, Mr.

13 Piatkowski's presentation to the CCP was in keeping with BellSouth's

14 intent to keep the CCP informed of developments in the DLEC

15 Collaborative project.

16

17 I must take exception to Mr. Bradbury's comment at line 2 on page 117 –

18 "As I explained above, AT&T has a long-standing request for a full-

19 function maintenance and repair interface, and has been negotiating in

20 good faith with BellSouth regarding this issue for over a year, yet

21 BellSouth failed to raise these projects as a possible solution." AT&T has

22 been requesting that BellSouth provide "TAFI Functionality" via the

23 machine-to-machine interface ECTA. On numerous occasions, the latest

24 being the denial of Change Control Request CR0012 (Exhibit RMP-42),

25 BellSouth has explained to AT&T that the ECTA architecture, built to the

1   National standards, is not compatible with 'TAFI functionality'. BellSouth

2   has also told AT&T that we would be happy to design and build a **non-**

3   **standard** machine-to-machine maintenance and repair interface for them.

4   However, AT&T has failed to submit the required BFR to initiate this effort,

5   presumably because AT&T doesn't want to pay for such a system.

6

7 Q.   PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 24.

8

9 A.   BellSouth provides CLECs nondiscriminatory access to maintenance and

10   repair functionality through the CLEC-TAFI and ECTA interfaces, as well

11   as available manual processes. BellSouth is in compliance with the

12   Telecommunications Act and is not required to provide any additional

13   maintenance and repair interfaces. If AT&T desires a non-industry

14   standard integrateable machine-to-machine interface that will provide

15   TAFI functionality, then AT&T should submit a BFR and pay for the design

16   and development of such an interface.

17

18

19 Q.   DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

20

21 A.   Yes.