

TAB F

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)

Joint Application by BellSouth Corporation,)
BellSouth Telecommunications, Inc., and BellSouth)
Long Distance for Provision of In-Region,)
InterLATA Services In Georgia And Louisiana)

CC Docket No. 02-35

**SUPPLEMENTAL DECLARATION OF BERNADETTE SEIGLER
ON BEHALF OF AT&T CORP.**

1. My name is Bernadette Seigler. My business address is 1200 Peachtree Street, Atlanta, Georgia. I am the District Manager, AT&T Local Services Access Management for Local Interconnection in AT&T's Southern Region. I previously submitted testimony in October 2000¹ in Docket No. 01-277¹ discussing the problems AT&T has experienced in its efforts to market its UNE P/Switched Combinations of Unbundled Network Elements to business customers.

2. Notwithstanding the passage of several months, AT&T continues to encounter significant problems that hinder its efforts to compete for small business customers. The conversion of UNE-P customers to AT&T service does not involve a physical change in facilities but instead requires only a billing change by BellSouth. As a

¹ Declaration of Bernadette Seigler, attached as Exh. L to the Comments of AT&T Corp. in Opposition to BellSouth Corporation's Section 271 Application for Georgia and Louisiana (dated Oct. 19, 2001) (the "Seigler Oct. Decl."). My background and experience are set forth in that Declaration.

result, problems during UNE-P conversions should be extremely rare. That is not the case with BellSouth, however. AT&T customers still frequently experience loss of dialtone and service troubles after conversion as a result of BellSouth provisioning problems. Outages and loss of service persist due to BellSouth's continued use of separate "D" (disconnect) and "N" (new) service orders to process UNE-P conversions. In addition, errors by BellSouth Local Carrier Service Center ("LCSC") representatives in retyping the significant number of AT&T orders that fall out for manual processing cause customers to lose features that they enjoyed from BellSouth or to experience inferior service due to unnecessary changes in facilities. Service problems also arise because BellSouth technicians implement the wrong translations for a UNE-P conversion or remove the customer from its existing facilities and place that customer on inferior facilities.

3. For business customers that rely on their telephone for their economic lifeline, such problems are unacceptable, and the customer will look to AT&T to resolve these problems even though BellSouth is the cause. Given this reality, AT&T needs a seamless transition from BellSouth for its UNE-P customers. To date, that has not been available.
4. An additional and new problem involving BellSouth DSL customers is also having a significant anticompetitive impact. BellSouth includes an ADL11 USOC code on the Customer Service Record ("CSR") of a customer receiving DSL service through a BellSouth affiliate or reseller. BellSouth has established a policy to reject any CLEC UNE-P order for a customer whose CSR includes the ADL11 USOC and to require

deletion of that ADL11 USOC code – and removal of the DSL service -- before it will process the CLEC UNE-P order. This policy has no technical basis as it is technically feasible for a CLEC to provide UNE-P service while BellSouth or its reseller Network Service Provider (“NSP”) provides DSL to the same customer.

5. Even if the policy were appropriate (and it is not), BellSouth has also failed to establish a reliable procedure to allow CLECs to work with prospective customers to change their NSP and remove the ADL11 USOC from their CSR. CLECs were originally supposed to call a BellSouth toll-free number to learn the identity of the customer’s NSP and then contact the customer to have the customer call the NSP and inform the NSP that the customer no longer wanted the NSP’s service. The NSP was then to notify BellSouth to remove the ADL11 USOC from the customer’s CSR. Not only was this process totally unmanageable, but also the process did not work. BellSouth never trained its personnel to provide the NSP information to CLECs calling the toll-free number, and at the February 28, 2002 UNE-P Users Group Meeting, BellSouth abandoned this process. BellSouth has yet to provide CLECs with a process for dealing with this issue. Clearly, this anticompetitive BellSouth policy does not allow CLECs to compete with BellSouth on an equal footing for BellSouth’s DSL customers.
6. Given both the continuing UNE-P conversion problems that I discussed in my October Declaration and the new ADL11 USOC code problems that have arisen, it is clear that BellSouth does not offer nondiscriminatory access to network elements.

I. BACKGROUND AND OCTOBER DECLARATION

7. My October Declaration described AT&T's efforts to serve the business market and the importance of that market to AT&T's local service entry strategy. Seigler Oct. Decl. at ¶¶ 3-7. AT&T is offering its All in Onesm service that provides local, intraLATA, long distance, calling card, toll free, and WorldNet services to business customers under a simple pricing structure. This service involves use of BellSouth's UNE-P offering with various AT&T facilities to provide the intraLATA, toll free, long distance, and internet services. The success of AT&T's All in Onesm service offering relies heavily on BellSouth's prompt and reliable provisioning of wholesale UNE-P services to AT&T.
8. My October Declaration described various problems that AT&T customers were experiencing with BellSouth's UNE-P offering. For the period June-August 2001, between 6-8 percent of AT&T UNE-P customers experienced outages or service troubles caused by BellSouth during the conversion to AT&T service. Seigler Oct. Decl. at ¶¶ 37. The most significant problem related to loss of service due to BellSouth's use of separate "D" and "N" orders to provision UNE-P conversions. Id. at ¶¶ 38-50. In addition, AT&T customers suffered various service disruptions, including ordered features that were not provided or excessive noise on a line due to BellSouth changes to the customer's facilities. Id. ¶¶ 49-52. AT&T's ability to offer UNE-P service to customers was also undermined by the instability of BellSouth's LENS ordering interface, which experienced 193 outages (one of which lasted 5 days) during a 15-month period. Id. at ¶¶ 55-59.

II. BELLSOUTH STILL DOES NOT OFFER PROMPT AND RELIABLE UNE-P SERVICE ON A CONSISTENT BASIS.

9. Four months have passed since the submission of my October Declaration, and the problems described in the October Declaration continue to be a significant impediment to AT&T's efforts to provide UNE-P service to the business market. In addition to the Georgia data provided in the October Declaration, as set forth in Attachment 1, 75 additional AT&T Florida and Georgia customers experienced outages and service troubles in converting to AT&T UNE-P service during the period July 1-November 1, 2001, with 13 of those customers suffering a loss of dialtone.² Since November 1, these problems have continued.³ Attachment 2 to this Declaration lists 43 customer conversions between November 2001 and January 2002 in which AT&T UNE-P customers suffered outages or service troubles as a result of BellSouth provisioning problems that were escalated for resolution to the AT&T supervisor. Attachment 3 documents 12 AT&T UNE-P customer outages and troubles that were escalated to an AT&T supervisor for resolution between February 1-19, 2002 as BellSouth did not resolve the troubles at the agent level.

Loss of Dialtone

10. At least 30 AT&T UNE-P customers have lost dialtone since November 1 as a result of BellSouth's continuing use of the separate "N" and "D" orders. BellSouth's claim

² The Attachment, which was submitted to the Georgia Public Service Commission, lists 81 customers who experienced outages or service troubles. Six of those customers (PONs ATLY0103990, ATLY0104162, ATLY0104335, ATLY0101308, ATLY0103257, ATLY0104004) were previously included in my October Declaration analysis. These numbers are limited to customers who reported outages or service troubles during the first 72 hours after conversion. Troubles reported after that time are compiled separately.

³ After November 1, AT&T's data collection group was reorganized, and different data collection procedures have been implemented.

that it has resolved the "D" and "N" outage problem is undercut by the 10 separate instances of AT&T UNE-P customers losing dialtone during conversion between February 1-19, 2002. The outages occur when the BellSouth technician does not process the orders in the proper sequence, and the customer's service is disconnected pursuant to the "D" order before the "N" order conversion is completed. A customer who cancels his order may still be converted to CLEC service anyway because the "N" order is worked prior to BellSouth's processing of the supplement canceling the order. Moreover, if there is no coordination of the two orders regarding use of the same facilities, the disconnection and new order may lead a business customer to receive UNE-P service over different facilities, which can lead to increased noise or other service quality problems.

11. Recent examples from January 2002 of loss of dialtone during UNE-P conversion include:

- In early January 2002, a brokerage firm lost dialtone on all its lines when the BellSouth technician disconnected the customer's service instead of converting the customer to AT&T UNE-P service. The loss of telephone service is critical for a brokerage firm and meant customers could not contact the firm to conduct securities transactions. Such outages could expose the firm to the risk of possible fines. (PON MIAY0201213).
- A cellular company lost dialtone on 11 lines when BellSouth technicians prematurely disconnected it during a conversion. Service was restored but then lost the next day when BellSouth again disconnected the customer. Such loss of

service interrupted the firm's ability to use its landline phones to serve the public.

(PON MIAY0201222).

- A Georgia communications company lost dialtone during its conversion to AT&T service when BellSouth worked the "D" order but did not carry out the "N" order.

(PON ATLY0200291).

12. My October Declaration also described various problems with BellSouth's maintenance and repair of UNE-P orders that generated trouble tickets. Seigler Oct. Decl. at ¶ 42. In recent months, AT&T customers have continued to experience problems in resolving outages due to problems with BellSouth's maintenance and repair operations. BellSouth maintenance personnel have closed out trouble tickets without checking with AT&T to determine if the problem had been resolved. If a problem remains, a second maintenance call becomes necessary, and the AT&T customer continues to be adversely affected until the trouble is ultimately resolved. In addition, BellSouth technicians have made visits to business customer locations after the business has closed for the day, even though the trouble ticket states that access is limited to business hours only. The BellSouth technicians either code the ticket "no access" or close out the trouble ticket, which requires a new trouble ticket and/or a second visit to the customer's premises. The customer's service problem continues during the delay, and AT&T is likely to get the blame for the problem.
13. AT&T and other CLECs have been urging BellSouth since March 2001 to adopt a single "C" order to convert UNE-P orders, Seigler Oct. Decl. at ¶ 43-47, and the Georgia Public Service Commission ordered BellSouth to implement the single "C"

order by January 2002. Id. at ¶ 49. BellSouth stated that it could not implement the change until March 23, 2002, and it recently announced that implementation of the single “C” order process would be limited to the states of Georgia, Louisiana, Florida, and Mississippi. This “C” order process will not be implemented in Alabama and South Carolina until July 20, 2002, and in North Carolina, Kentucky, and Tennessee until August 3, 2002. Thus, CLECs in these other BellSouth states and their customers will continue to be plagued by “D” and “N” order outages for at least an additional three to five months.

14. Moreover, there is no guarantee that implementation of the “C” order process will resolve the problem. BellSouth previously promised that a systems change on July 18, 2001 would resolve the “D” and “N” order issue, but that fix did not work, as evidenced by the continuing outages. Clearly, this issue cannot be resolved until the change is made and all concerned have had the opportunity to determine whether the “D” and “N” problem has been eliminated.

Service Disruptions

15. In addition to outages, AT&T customers continue to suffer service disruptions in connection with conversion to AT&T UNE-P service. For the period November 2001 to February 19, 2002, there were at least 25 service troubles that adversely affected AT&T UNE-P customers. These problems can arise as a result of errors made by the BellSouth LCSC representative in manually retyping AT&T UNE-P orders that fall out for manual processing. Errors made on the order may lead the BellSouth technician to input the wrong translations in making the software changes to convert

the customer's service. As a result, the customer may not have the features that it requested or may lose hunting ability where the call rolls to an open line if the principal line is in use. If the conversion order is not coordinated, one BellSouth technician may also remove the customer from its existing facilities and a second technician may place that customer on different (and perhaps faulty) facilities. Such a change in facilities could cause a customer to experience noise on the line that did not previously exist.

16. Recent examples of service troubles from January 2002 include the following:

- A Georgia antique store requesting hunting, but BellSouth failed to provision the hunting, and as a result, customers received a busy signal if the main line was in use. As a result, when a sales representative was speaking with one customer by telephone, customers could not get through even though lines were available. (PON ATLY0200532).
- BellSouth failed to provision voicemail service requested by a business that was included on the service order AT&T submitted to BellSouth. As a result, calls would ring with no answer instead of being transferred into voicemail, and as a result, the company lost possible sales from interested customers. (PON MIAY0200136).
- A towing company could not gain remote access to call forwarding because BellSouth set the wrong pin number for the customer's service. This problem lasted for several days. For a towing company, the ability to remotely access and

change call forwarding of calls is critical in meeting the needs of its customers who require timely towing. BellSouth's failure to include the correct pin information hurt the company economically. (PON MIAY0121762).

- A retail store experienced static on the line that was not present before the conversion to UNE-P service. This static interferes with customer calls and can result in loss of sales. (PON RLGY0200223).

LENS Instability

17. My October Declaration also described the problems associated with the 193 outages of BellSouth's LENS ordering interface between August 2000 and October 2001. Seigler Oct. Decl. at ¶¶ 55-59. The LENS instability problems continue. In January 2002 alone, LENS experienced nine separate outages ranging in duration from 20 minutes to several hours.⁴ These ongoing outages occur at various hours and complicate AT&T's ability to enter orders and interfere with AT&T's initial interaction with its customers.⁵
18. In sum, the problems identified in my October Declaration relating to BellSouth's UNE-P service have not been resolved. Although BellSouth has committed to make changes to solve some of these problems, such commitments at present are merely paper promises that have not been carried out, and BellSouth cannot rely on those promises alone but must demonstrate that the proposed changes actually work and

⁴ The LENS System Outages Report is set forth at www.interconnection.bellsouth.com/markets/lec/ccp/ccp_so_lens.html. BellSouth does not report outages less than twenty minutes long.

resolve the problem before it can be found to provide nondiscriminatory access to network elements.

III. BELLSOUTH'S POLICY RESTRICTING DSL CUSTOMERS FROM CONVERTING TO CLEC UNE-P SERVICE IS PLAINLY ANTICOMPETITIVE.

19. A new problem has arisen relating to restrictions BellSouth imposes on its DSL customers seeking to convert to AT&T UNE-P service. BellSouth includes an ADL11 USOC on the CSR of customers that receive DSL from a BellSouth affiliate or NSP.⁶ BellSouth is rejecting CLEC UNE-P orders for customers with an ADL11 USOC on their CSR and requiring that the ADL11 USOC be removed from the customer's CSR before BellSouth will process the order. To accomplish this, the CLEC must notify the customer that the customer cannot retain its existing DSL service if it wants to convert to the CLEC UNE-P service. The CLEC must also ask the customer to notify its NSP that the customer no longer wants the DSL service, and the NSP must then contact BellSouth to have the ADL 11 USOC removed from the customer's CSR.⁷

20. This BellSouth policy is plainly anticompetitive. First, it is clearly technically feasible for AT&T or another CLEC to offer UNE-P service to a customer at the

⁵ The October Declaration also discussed BellSouth's inability to provide accurate due dates for UNE-P orders. Seigler Oct. Decl. at ¶ 58. BellSouth claims that it has implemented a fix for this problem as of February 9, 2002, but it is too soon to tell whether this issue has been resolved.

⁶ BellSouth has indicated that the ADL11 USOC is included on the CSR for provisioning purposes to indicate that the DSL service is billed to the NSP, who then bills the end user customer.

⁷ In January, 2002, Birch Telecom submitted Change Request No. CR0625-FTTF-34 seeking to eliminate the rejection of UNE-P orders for customers whose CSR includes the ADL11 USOC. Attachment 4. The Change Request notes that it took 60 days to remove the ADL11 USOC from one customer's CSR. BellSouth has placed the Change Request in the "pending" category, although BellSouth representatives did state at the February 28, 2002

(Footnote continued)

same that a BellSouth affiliate or NSP provides DSL service. Second, the process BellSouth has established to remove the ADL11 USOC from the customer's CSR is totally unmanageable and unrealistic. Many potential customers will undoubtedly view BellSouth's requirement that the customer become involved in removing the ADL11 USOC code from the customer's CSR as a significant disincentive to signing up for a CLEC's UNE-P service.

21. Finally, BellSouth's CSRs often contain inaccurate ADL11 USOC information. Several customers contacted by CLECs after rejection of a UNE-P order have told the CLEC that they had discontinued DSL service for some time and did not understand why the USOC code was still on their CSR. Even when there is no DSL service, the required contact with BellSouth to obtain the alleged NSP information and with the customer to inquire about the identified NSP provider adds to both the expense and inconvenience for both the CLEC and the customer.
22. Not only is the process established by BellSouth unmanageable, it is also not operational. BellSouth's minutes of the December 6, 2001 UNE-P Users Group meeting provided a toll-free number to the BellSouth Digital Services Group that would provide the name of the DSL providers for the UNE-P orders rejected because the customer's CSR included the ADL11 USOC. Attachment 5, p. 8 (listing toll-free number in closing Action Item 86 relating to this issue). CLECs were directed to call the toll-free number and obtain the identity of the customer's NSP so that the CLEC

UNE-P Users Group Meeting that the Change Request was one possible vehicle for addressing the ADL11 USOC issue.

could call the customer to start the process of removing the ADL11 USOC from the customer's CSR.

23. AT&T called the toll-free number on February 8, 2002 to obtain the identity of various customers' NSPs. During that call, the BellSouth representatives stated they were not aware of the process and did not know where the information could be obtained. I escalated the issue and was informed by email on February 20 that the problem was an "isolated incident" and that the policy had been conveyed to the BellSouth telephone representatives. Attachment 6.
24. I called the designated toll-free number again on February 22 and was again told by BellSouth representatives that they were not aware of the process. Attachment 6. Furthermore, I was told by a BellSouth manager in the DSG group that my February 22, 2002 conversation was the first time that he had learned of the process, and he did not have the NSP information to provide to me. Id. I called again on February 25, 2002 and was told by the same BellSouth manager that he could not provide the NSP information to me because I did not work for the NSP. Clearly, even with BellSouth's unmanageable process, that process cannot work if BellSouth does not have personnel trained to provide basic information over the telephone in response to CLEC requests. Attachment 7 lists 18 customers interested in AT&T UNE-P service that could not be converted in a timely manner because their orders had been rejected for having ADL11 USOCs on their CSRs, and AT&T could not obtain the information on the customer's NSP to even begin the laborious process of getting the ADL11 USOC removed from the customer's CSR.

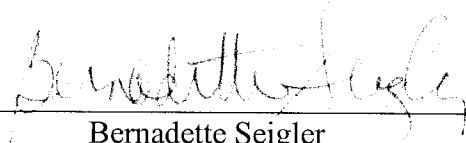
25. At the UNE-P Users Group February 28, 2002 meeting, BellSouth announced that it was abandoning the toll-free number process and would consider various alternatives for resolving this issue. It acknowledged that it sometimes did not remove quickly the ADL11 USOC code from the CSRs of customers that no longer used BellSouth DSL service. BellSouth did not indicate what process or procedures should be used to handle UNE-P order rejections resulting from ADL11 USOC codes on the customer's CSR. The only promise BellSouth made was to report on the issue in a month at the next UNE-P Users Group. Thus, CLECs are now left without a process for dealing with UNE-P orders rejected by BellSouth for having the ADL11 USOC code, and it could be months before this issue is resolved.
26. BellSouth's policy is clearly anticompetitive and inconsistent with its obligations under the Act to make unbundled network elements available on a nondiscriminatory basis. Until BellSouth abandons this policy, BellSouth cannot claim that it is meeting the requirements of Section 271 of the Act.

CONCLUSION

27. Service outages and troubles continue at too high a level for a simple record change, and AT&T's efforts to offer UNE-P service continue to be undercut by BellSouth's failure to provide a seamless transition to AT&T service. BellSouth must also remove the restrictions on the conversion of its DSL customers so that CLECs can compete for these customers on a nondiscriminatory basis.

I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on March 1, 2002


Bernadette Seigler

Attachment 1

AT&T UNE P Troubles

AT&T Trouble Ticket	Trouble Report Date	PON#	Out of Service	Impaired Service
213936	7/2/2001	ATLY0102861	X	
200401	7/3/2001	JCVY0100578	X	
213963	7/3/2001	ATLY0103990		X
243556	7/3/2001	MIAY0104991		X
243559	7/3/2001	MIAY0109017	X	X
243635	7/6/2001	MIAY0109011		X
200406	7/9/2001	JCVY0100843		X
204443	7/10/2001	ORLY0102078	X	X
214048	7/10/2001	ATLY0104162	X	
243705	7/10/2001	MIAY0108997		X
243748	7/10/2001	MIAY0108680	X	
204461	7/12/2001	ORLY0102131		X
243821	7/12/2001	MIAY0108284	X	
200415	7/13/2001	JCVY0100801		X
243903	7/13/2001	MIAY0109887	X	
214168	7/17/2001	ATLY0104763		X
244071	7/19/2001	MIAY0107854A		X
200428	7/20/2001	JCVY0100874		X
214262	7/20/2001	ATLY0103649		X
214274	7/20/2001	ATLY0104335		X
244114	7/20/2001	MIAY0109672		X
214301	7/23/2001	ATLP0103118A		X
214308	7/23/2001	ATLY0104340		X
214330	7/24/2001	ATLY0101308	X	
244260	7/25/2001	MIAY0107854		X
204561	7/26/2001	ORLY0102867	X	
204563	7/26/2001	ORLY0101963		X
244317	7/26/2001	MIAY0109813		X
214486	7/30/2001	ATLY0105121		X
200447	7/31/2001	JCVY0100604		X
204588	7/31/2001	ORLY0102416		X
214547	7/31/2001	ATLY0101151	X	
200449	8/1/2001	JCVY0100948		X
214647	8/2/2001	ATLY0103257		X
244597	8/2/2001	MIAY0106321		X
214691	8/4/2001	ATLY0104004		X
204623	8/7/2001	ORLY0102413		X
244697	8/7/2001	MIAY0111530		X
244717	8/8/2001	MIAY0111530		X
244778	8/9/2001	MIAY0108138		X
244785	8/9/2001	MIAY010987		X
214829	8/10/2001	ATLY0105356		X
244822	8/10/2001	MIAY0111532	X	
244844	8/11/2001	MIAY0111421		X
244855	8/13/2001	MIAY0111803		X
200459	8/14/2001	JCVY0101135		X
244943	8/14/2001	MIAY0112179		X
200466	8/16/2001	JCVY0101118		X
204698	8/16/2001	MIAY0112099	X	
245102	8/17/2001	MIAY0111739		X
204719	8/20/2001	MIAY0112257		X
245332	8/24/2001	MIAY0112771	X	
200504	9/5/2001	JCVY0101297		X
245664	9/5/2001	MIAY0112779		X
245715	9/7/2001	MIAY0112677		X
200508	9/10/2001	JCVY0101172		X
245745	9/10/2001	MIAY0114226		X
245851	9/13/2001	MIAY0112282		X

AT&T UNE P Troubles

AT&T Trouble Ticket	Trouble Report Date	PON#	Out of Service	Impaired Service
245876	9/14/2001	MIA0113972		X
246001	9/19/2001	MIA0111213		X
246015	9/19/2001	MIA0114278		X
215810	10/2/2001	ATLY0106761		X
215817	10/2/2001	ATLY0102590		X
246499	10/2/2001	MIA0108594		X
246779	10/10/2001	MIA0114930		X
200578	10/11/2001	JCVY0100735		X
205038	10/12/2001	ORLB0100055		X
246851	10/12/2001	MIA0114929		X
216005	10/15/2001	ATLY0103471		X
246967	10/16/2001	MIA0116199		X
246984	10/16/2001	MIA0113844		X
216069	10/17/2001	ATLY0102403		X
247001	10/17/2001	MIA0109448		X
247049	10/18/2001	MIA0116195		X
216108	10/19/2001	ATLY0107047	X	
200598	10/22/2001	JCVY0101511		X
247285	10/24/2001	MIA0116756		X
216214	10/27/2001	ATLY0107210		X
216249	10/30/2001	ATLY0102311		X
216250	10/30/2001	ATLY0104322		X
247516	10/30/2001	MIA0116488		X

Attachment 2

**Summary of BellSouth
UNE-P Outages and Troubles Escalated
to ATT Supervisor
November 2001-January 2002**

PONASR Number	Premature Disconnect Due to Unrelated "N" and "D" Orders	Order Typed in BellSouth System Does Not Match Order as Submitted by AT&T	BellSouth Technician Implements Wrong Translations	BellSouth Removed Customer from Existing Facilities and Placed on Faulty Facility	Comments
MIAY0117998	X				D before N
MIAY0120508	X			X	Multiple LEC issues
MIAY0119178	X	X	X		Multiple LEC issues
ATLY0107554	X				D before N
MIAY0118195		X	X	X	Feature Not Provisioned-Hunting
MIAY0112257		X	X		BellSouth changed facilities
MIAY0112089		X	X		BellSouth changed facilities
ORLY0104032	X				D before N
MIAY0118321	X			X	Multiple LEC issues
MIAY0118756		X			Feature Not Provisioned-Hunting
MIAY0107617	X			X	Multiple LEC issues
JCVY0101123	X			X	Multiple LEC issues
MIAY0114183	X				D before N
MIAY0114226	X				D before N
MIAY0113799	X				D before N
MIAY0117286	X		X	X	Multiple LEC issues
MIAY0117419	X				D before N
ATLY0106798	X				D before N
ORLY0102676			X		PIC set wrong in translations
MIAY0200155	X				D before N
MIAY0201222	X				D before N
MIAY0201213	X				D before N
MIAY0201712	X				D before N
RLGY0200223	X			X	Multiple LEC issues
ATLY0200291	X				D before N
MIAY0201490		X			LEC Order Incorrect
ORLY0200248				X	Faulty Facilities
JCVY0200149				X	Faulty Facilities
MIAY0201708				X	Faulty Facilities
MIAY0121782		X			Feature Not Provisioned-Call Forwarding
MIAY0200894		X			Feature Not Provisioned-Call Forwarding
MIAY0201960		X			Feature Not Provisioned-Call Forwarding
MIAY0202507		X			Feature Not Provisioned-Call Forwarding
MIAY0200291		X			Feature Not Provisioned-Caller ID
ATLY0200532		X			Feature Not Provisioned-Hunting
MIAY0200878		X			Feature Not Provisioned-Hunting
MIAY0201808		X			Feature Not Provisioned-Hunting
MIAY0201533		X			Feature Not Provisioned-Hunting
MIAY0200831		X			Feature Not Provisioned-Hunting
MIAY0200552		X			Feature Not Provisioned-Hunting
MIAY0200924		X			Feature Not Provisioned-Voice Mail
MIAY0201554		X			Feature Not Provisioned-Voice Mail
MIAY0200136		X			Feature Not Provisioned-Voice Mail

Attachment 3

**Summary of BellSouth
UNE-P Outages and Troubles Escalated
to ATT Supervisor February 2002**

BMP / TMTS Ticket Number	PON/ASR Number	Premature Disconnect Due to Unrelated "N" and "D" Orders	BellSouth Removed Customer from Existing Facilities and Placed on Faulty Facility	Order Typed in BellSouth System Does Not Match Order as Submitted by AT&T	BellSouth Technician Implements Wrong Translations	Comments	DATE
220101717	ATLY0200924	X				D before N	2/1/2002
213002445	MIA Y0201837	X				D before N	2/1/2002
220502633	GNBY0200216	X				D before N	2/1/2002
220502848	ATLY0201045	X				D before N	2/5/2002
220504071	MIA Y0203699	X				D before N	2/6/2002
220602497	MIA Y0203478	X				D before N	2/6/2002
220404139	JCVY0200271	X				D before N	2/4/2002
221204030	MIA Y0203906	X				D before N	2/13/2002
221401307	MIA Y0204323	X				D before N	2/14/2002
221504492	MIA Y0204600		X			No Jumper	2/18/2002
221802247	MIA Y0204604			X	X	Line Switch	2/18/2002
221901283	MIA Y0204722	X				D before N	2/19/2002

Attachment 4



Change Request Form

To be completed by BCCM only:01/24/02

(1) CHANGE REQUEST LOG #	CR0825- FTTF-34
(2) STATUS	P

To be completed by CCM or BellSouth:

(3) REQUEST TYPE	<input checked="" type="checkbox"/> TYPE 2 (REGULATORY)	<input type="checkbox"/> TYPE 3 (INDUSTRY)	<input type="checkbox"/> TYPE 4 (BST)	<input type="checkbox"/> TYPE 5 (CLEC)
	<input type="checkbox"/> TYPE 6 (DEFECT) NOTE: COMPLETE SECTION 2	<input type="checkbox"/> EXPEDITED FEATURE	<input checked="" type="checkbox"/> FLOW-THRU FTTF-34	

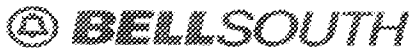
SECTION 1

(4) COMPANY NAME	BIRCH TELECOM, Inc.
(5) OCN	
(6) CCM NAME	Mel Wagner Jr.
(7) TELEPHONE NUMBER	816-300-3800
(8) CCM EMAIL ADDRESS	<u>Mwagner@birch.com</u>
(9) CCM FAX NUMBER	816-300-3350
(10) ALTERNATE CCM NAME	John Ivanuska
(11) ALTERNATE PHONE NUMBER	816-300-3342
(12) ORIGINATOR'S NAME	Mel Wagner Jr.
(13) ORIGINATOR'S PHONE NUMBER	816-300-3800
(14) TITLE OF CHANGE REQUEST	DSL- Drop DSL USOC (ADL11) Upon Conversion Without Receiving Manual Auto Clarification

(15) CATEGORY	<input type="checkbox"/> ADD NEW FUNCTIONLITY	<input checked="" type="checkbox"/> CHANGE EXISTING
(16) DESIRED DUE DATE		

Attachment A-1

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



Change Request Form

(17) ORIGINATING CCM ASSESSMENT OF IMPACT	<input checked="" type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW
(18) ORIGINATING CCM ASSESSMENT OF PRIORITY	<input type="checkbox"/> URGENT	<input checked="" type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM <input type="checkbox"/> LOW

(19) INTERFACES IMPACTED				
PRE-ORDERING	<input type="checkbox"/> LENS	<input type="checkbox"/> TAG	<input type="checkbox"/> CSOTS	
ORDERING	<input type="checkbox"/> EDI	<input checked="" type="checkbox"/> LENS	<input checked="" type="checkbox"/> TAG	<input type="checkbox"/> LNP
MAINTENANCE	<input type="checkbox"/> TAFI	<input type="checkbox"/> EC-TA Local		
MANUAL	<input type="checkbox"/> Manual			

(20) TYPE OF CHANGE (Check one or more, as applicable)				
<input checked="" type="checkbox"/> Software	<input type="checkbox"/> Product & Services	<input checked="" type="checkbox"/> Documentation	<input type="checkbox"/> Hardware	<input type="checkbox"/> New or Revised Edits
<input type="checkbox"/> Regulatory	<input type="checkbox"/> Industry Standards	<input checked="" type="checkbox"/> Process	<input type="checkbox"/> Other	<input type="checkbox"/> Defect
<input type="checkbox"/> Expedited Feature	<input checked="" type="checkbox"/> Flow Through			

<p>(21) DESCRIPTION OF REQUESTED CHANGE (Including purpose and benefit received from this change. Include attachments if available)</p>	<p>Birch has experienced a reoccurring unresolved issue that has been worked through the UNEP Forum since 9/25/01 and with our Account Team on a daily basis. Neither channel has provided a sufficient and/or permanent resolution to the issue.</p> <p>ISSUE: Birch can not removal DSL at the time of conversion even upon the customer request. The customer and or CLEC is required to work the removal of the DSL through the retail DSL channel. The DSL retail shop has no escalation process, service level agreement or real incentive to work a CLECs request. Birch has consistently experienced taking 30 days or more to remove (disconnect or move to another line) the DSL.</p> <p>Birch requests the ability to submit an LSR that will drop the DSL USOC (ADL11) upon conversion without receiving a manual or auto clarification. Birch requests implementing a system modification that will allow a ReqTypM, ActTypV, LNA V to flow without clarification and drop the DSL USOC upon conversion.</p> <p>POINTS:</p> <ol style="list-style-type: none"> 1) Removal of DSL USOC (ADL11) upon conversion in allowing a CLEC to use LNA V without manual or auto clarification. Conversely, maintaining the functionality that would allow an auto clarification on LNA G. 2) Impacts approximately 10% of Birch order volume 3) Removal interval by the DSL retail center quoted at a minimum of 10 days, Birch has experienced over 30 day intervals
------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Attachment A-1

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



Change Request Form

	4) Maintain this type of order will mechanically flow through without manual intervention or BST errors
(22) REQ TYP(s) IMPACTED:	M
(23) ACT TYP(s) IMPACTED:	V, LNA V
(24) PROVIDE EXAMPLE OF REQUESTED CHANGE:	1) T&B Motors BTN 770-929-3353 took slightly over 60 days to have the DSL USOC removed. 2) Current examples include: STI Development BTN 615-833-6599; Smokey Mountain Floor Covering & Design BTN 865-453-1056; Rodney Sartain Architect BTN 205-879-5458; Stylistic Hair Studio BTN 404-622-1148
(25) Identify the LSOG versions that are affected by this change	4

This section to be completed by BellSouth only:

(26) Does this request require clarification?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
(27) Clarification Request Sent	
(28) Clarification Response Due	

(29) Change Request Review Date	
(30) Target Implementation Date	

(31) Change Review Meeting Results	01/25/02 FTTF-34 Being reviewed for acceptance by BellSouth. 02/18/02 E-mail sent to CLEC requesting additional time to respond. (Original response due 02/08/02) 02/22/02 BellSouth has placed this request in pending status.
-------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

(32) CANCELED CHANGE REQUEST	<input type="checkbox"/> DUPLICATE	<input type="checkbox"/> TRAINING	<input type="checkbox"/> CLARIFICATION NOT RECEIVED
(33) CANCELANATION ACKNOWLEDGMENT	<input type="checkbox"/> CLEC	<input type="checkbox"/> BST	DATE:

(34) APPEAL	<input type="checkbox"/> YES <input type="checkbox"/> NO
(35) APPEAL CONSIDERATIONS	

SECTION 2

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

(36) PON #	
(37) ERROR MESSAGE:	

Attachment A-1



Change Request Form

(38) RELEASE OR API VERSION
(If applicable)

(39) DESCRIPTION OF DEFECT SCENARIO:

SECTION 3

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

(40) DEFECT VALIDATION RESULTS:

(41) CLARIFICATION NEEDED: YES NO

(42) VALIDATED DEFECT IMPACT LEVEL: HIGH MEDIUM LOW

(43) VALIDATION TYPE: DEFECT FEATURE TRAINING ISSUE DUPLICATE

(44) DEFECT IMPACTS OTHER CLECS? YES NO

(45) INTERFACES IMPACTED BY DEFECT: EDI TAG LNP LENS
 TCIF 7 TCIF 9

(46) TARGET IMPLEMENTATION DATE:

Attachment A-1

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



Change Request Form

Attachment 5

UNE-P USER GROUP MEETING MINUTES DECEMBER 6, 2001

Margaret Garvin facilitated the UNE-P User Group Workshop that was relocated from BellSouth Center Vail Auditorium to the Renaissance Hotel in Atlanta, GA due to an evacuation drill. This was the fifth meeting of the UNE-P user group. She welcomed the attendees (workshop attendee list included). Roll call was taken and the agenda was reviewed.

Margaret reviewed revisions to the Rules of Engagement with attendees. The following revisions were adopted by the User Group members:

- Meeting minutes will be provided two (2) weeks after the workshop.
- The workshops will be one day long depending on the subject matter and the number of issues to be discussed. The Facilitator will summarize each day's activities and clearly outline the structure for the next meeting. Meetings will be scheduled to take into account other User Groups as well as Change Control meetings. Unless otherwise specified, the workshops will begin at 8:30 AM EST and end at 5:00 PM ET.
- The reasons for the closure of action items (shown in the status column of the action plan) will include the following:

Customer OK'd closure.

- For use when CLEC is satisfied with the response given

Issue is outside of the scope of the user group.

- Change control issue: The change request number will be included in the status column of the action plan, if it has been assigned through CCP. A hyperlink will also be included that links to the Change Control website.
- Billing issue
- Referred to account team
- Regulatory or legal issue

Customer OK'd closure; issue is not resolved.

- For use when CLEC is not satisfied with the response given and the issue is within the scope of the user group.

- **CONFERENCE CALL & E-MAIL ETIQUETTE**

When participating on conference calls

- Identify yourself during roll call(s) or when you join or rejoin the conference call
- Do not mute your phone if you have music- or advertising-on-hold
- When you are not on mute, do not conduct side conversations

When sending e-mail

- The Reply To All function is a convenience when used appropriately and a nuisance when not. Only use when all members of the e-mail distribution list need to be contacted
- Change Subject when using the Reply function, to reflect the contents of the e-mail (e.g. action item number, RSVPs, etc.)
- Do not use HTML or other special text formats. Some recipients are unable to open this type of e-mail without downloading and saving the file.

Janet Miller-Fields-BellSouth Customer Care OAVP gave presentation “**Local Carrier Service Center (LCSC) Customer Care Overview**”. She reviewed the organization charts for the **Local Operations Lead Team** (headed by Dee Freeman-Butler). The LCSC serves as the single point of contact (SPOC) for processing Local Service Requests (LSRs) from CLECs. The LCSC is divided into three separate centers to handle the three major categories of services requested: Resale, UNE and Complex. The primary purpose of the Quality Control Group (headed by Bill Thrasher) is to support Local Operations, including the LCSC, in achieving a higher level of accuracy leading to: decreased duration; improved flow through; increased customer satisfaction; and measurably fewer complaints, escalations and expedites. Fleming Island FL is the Service Center for all CLECs’ Resale and Atlanta UNE calls. It is the CLEC single point of contact in resolving issues, problems and escalations. It identifies process issues for correction. This allows the Birmingham and Atlanta centers to concentrate on production. Fleming Island also assists with production when needed.

The UNE-P User Group attendees felt that service representatives should call back the CLEC if it is going to take more than fifteen minutes to resolve an issue or answer a question. Also the fifteen-minute bogey needs to be posted on web and included in documentation. There was also concern that they should not be handed off from Fleming Island to the Duluth or Birmingham LCSCs. The CLEC customers want to know what the handoff process is to another center.

The **Customer Care Group** (headed by Janet) handles project management, customer support management, measurements analysis, and flow through.

The **Project Management Group** manages projects for CLECs offering complex services; coordinates, monitors and tracks activities with BellSouth internal departments responsible for provisioning the services and with services. **Customer Support Management** supports network state and regional teams; and helps CLECs (with threshold order volumes) to reduce clarification rate, improve percent flow through and increase electronic system usage.

The **Measurements Analysis Team** analyzes monthly performance report and provides action plans to correct; and analyzes LCSC performance for order completion, internal and firm order confirmation, and provided action plan to correct.

The **Flow Through Team** performs root cause analysis on manual fall-out; identifies system defects and recommends system enhancements; and leads flow through task force.

Steve Vanderburg-BellSouth Interconnection Services Manager gave "**Customer Wholesale Interconnection Network Service (CWINS) Center Overview**". CWINS centers are located in Duluth GA, Birmingham AL, and Fleming Island FL. The CWINS center is the single point of contact for Facility-based and Resale CLECs; and provisions and maintains Unbundled Network Elements (UNE), and complex and non-complex Resale services.

CWINS non-designed maintenance team handles all UNE-P and Resale non-designed troubles for the Atlanta, Fleming Island and Birmingham CWINS centers. Their responsibilities are to answer calls quickly and efficiently, screen troubles to clear service disruptions, and escalate repeat troubles to the correct departments.

The **Enhanced Services Group** is responsible for handling pending facilities (PF); completions resolutions; and local number portability.

The **Pending Facilities Group** is the single point of contact for all designed PF orders and responsible for screening order to be sure that applicable facilities are used; and escalating for Estimated Completion Date (ECD) and for the completion of the job.

The **Completions Resolution Group** supports all CWINS operation centers and responsible for on-line assistance to CWINS, Work Maintenance Center (WMC) and other departments; providing feedback to center managers; and completing orders and resolving issues.

The **Local Number Portability Group** provides quality control and trouble resolution and responsible of reducing trouble reports on ported numbers; ensuring that porting orders are issued and provisioned correctly; and is the single point of contact for the CLEC to resolve post porting issues.

CWINS Operations Support (headed by Ken Ainsworth) is responsible for measurements; LNP/collocation/special groups and projects; provisioning/new products; maintenance/new products; and implementation/audits.

Measurements is responsible for operational results, and regulatory measurements and results. **LNP/collocation/special groups and projects** is

responsible for LNP number portability (LNP and WNP) and number pooling; collocation support; and project management support. **Provisioning/product support** is responsible for CWINS representation of the product team that develops new product processes for provisioning maintenance and billing product life cycle support; and provisioning CWINS operations support including provisioning quality assurance group (QUAG) and provisioning center operation reviews. **Maintenance** is responsible for CWINS maintenance support, maintenance QUAG, maintenance center operations reviews, and product development and support.

The **Documentation Group** reconciles methods and procedures for proper identification, context and content; publishes and maintains documentation; and is responsible for improvement initiatives.

Steve reviewed CWINS trouble handling procedures. In case of trouble CLEC should:

- Report all UNE-P service interruptions to the CWINS center at 888-461-0612.
- The CWINS center call receipt MA will immediately escalate the trouble condition to a CWINS first-level manager.
- The CWINS first-level manager will escalate the trouble to a CWINS screening MA to screen/resolve the trouble condition or route the trouble for resolution and provide immediate notification to the LCSC staff of a UNE-P conversion trouble.
- The CWINS screening MA will initiate a first level escalation to the "routed to" department and will get an estimated restoral time in return.
- The CWINS first-level manager will notify the CLEC contact of the steps being taken to resolve the service interruption and provide the CLEC contact with the estimated restoral time.
- CLEC can obtain a trouble report status either through TAFI or by contacting the CWINS center.
- The CWINS first-level manager will notify the CLEC contact when the trouble condition has been cleared and provide the CLEC contact with actions taken to restore service.

In response to CLEC concerns about UNE-P conversion service interruptions, BellSouth performs Root Cause Analysis (RCA) on all UNE-P conversion service interruptions. Less than one percent of all CLEC UNE-P conversions encounter a service interruption. The average receipt-to-clear duration for UNE-P conversion service interruptions was 7.688 hours in September and 6.274 hours in October.

Network Telephone wants to know the name of the BellSouth manager who owns an escalated trouble so that they can document. They have not been getting responses on many tickets and end up having to enter them repeatedly.

The status shows "closed", but they have not been advised of anything being done. They have received callbacks only about 25% of the time. According to Steve Vanderburg and Scott Woolard, regular non-design maintenance tickets are handled by network, but any problems should be referred to CWINS center so that they can help coordinate with network to ensure that they call CLEC to advise of the status.

ITC^DeltaCom has been having problems entering tickets in TAFI, because it indicates that it is an ordering issue. Scott suggested that they override the process flow in TAFI.

Bernadette Seigler of AT&T wanted to know why CLECs need to call CWINS and input trouble in TAFI – seems redundant. According to Steve, the call is to ensure that the trouble is escalated immediately as "out of service"

Janet Miller-Fields concluded with BellSouth's commitment to all User Groups. Subject Matter Experts (SMEs) and Customer Support Managers (CSMs) have been identified for Resale, UNE-P and Facility-based/UNE User Groups. SMEs and CSMs will attend internal conference calls held prior to the User Group meetings and the User Group meetings with CLECs. They will also participate in a meeting one week prior to the User Group meeting to review and respond to action items from the User Group action plan that will be scheduled by CSMs.

- SMEs will respond to action items concerning LCSC methods, procedures, and incorrect or incomplete documentation.
- CSMs will respond to action items referencing incorrect or incomplete actions by employees in the LCSCs, clarifications, incorrect clarifications, failure to follow documented work processes in CDIA.

Ranae Stewart-BellSouth Project Manager gave "**High-Level Single C-Order Overview**". Single C is an effort within BellSouth to process the request to convert an account to UNE-P via the issuance of a single change order. Currently, a new (N) order and a disconnect (D) order are required. Conversion scenarios will include Resale to UNE-P (same or different CLEC), Retail to UNE-P (BellSouth to CLEC), and UNE-P to UNE-P (CLEC to CLEC). The account types planned are residence and non-complex business. This will eliminate the need for two SOCS orders and the associated coordination. There will be no change in LSR inputs or processing by CLECs. However, BellSouth's internal ordering/billing process will change. Single C will be both manual and mechanized. The targeted implementation date is second quarter of 2002.

Testing of the single C-order will begin February 2002. Network Telephone volunteered to be test CLEC for single C if one is needed. They also voiced concern about BellSouth meeting the target date and possibilities of delays. According to Ranae, project is on target now. BellSouth wants single C to be included in release 10.4. But in both cases no guarantee can be given as to

what might happen in the future. This type of C-order will be indistinguishable from any other C-orders in CSOTS.

Mel Wagner of Birch Telecom wants to see data from fallout of BellSouth's testing for assurance that problems are anticipated and addressed before live rollout. Network Telephone echoed this concern. Ranae will take this request to the project team and see if this recommendation will be adopted.

Marv Watts-BellSouth Customer Support Manager gave "**CLEC Action Plan Overview**". An action plan is a framework for partnering. It addresses clarification and order flow through goals of individual CLECs and BellSouth. Clarifications impact service delivery. Clarification concerns are common to both CLECs and BellSouth. Electronic order flow through affords swifter service delivery. The action plan summarizes resources available to CLECs. It identifies key internet-based resources; outlines the role of the Customer Support Manager (CSM); and identifies data analysis areas provided by the CSM. The action plan provides benchmarking information for goal setting. It presents prior trend information by month, which typically includes LSR, order and clarification counts; count of CLEC caused clarifications; electronic flow through percentages; and information on specific types of clarifications. Action Plans are recommended when clarification rates are greater than 20% or when flow through rates are less than 90%. CLECs already meeting targets continue on a Maintenance Plan. The action plan provides for an ongoing progress evaluation and goal reshaping. The review of results is made at agreed upon intervals and gives CLEC and CSM and opportunity to adjust targets. CLECs will be assigned a CSM and therefore qualify for action plan development based on CLEC ordering volume (the number of LSRs) on a rolling three-month basis. A CSM is required for action plan implementation due to the data analysis and assembly demands. CLECs with 1200 Resale or more and 500 or more Facility-based LSRs have assigned CSMs. CLECs with 500-1199 Resale and 250-499 Facility-based LSRs have access to the CLEC Support Team that will be established effective December 7, 2001. CLECs with less than 500 Resale and less than 250 Facility-based LSRs have access to their Account Team. The action plan is comprised of a statement of purpose, an action plan outline, an overview of resources, a statement of BellSouth initiatives supporting plan, a data analysis section with results broken down by month and company code, and an affirmation section. CLEC, CSM and Account Executive sign off on the affirmation section, which states that the purpose of the affirmation is goal-focused cooperation. Progress evaluations may be made for tracking purposes, but are not used to set any standing with BellSouth. The action plan is not a contract. Having an affirmed action plan opens up data analysis commitments from CSMs. The action plan may also contain CLEC situation-specific data (listing clarifications, progress scenarios). Action plan implementation begins when the CSM contacts CLEC for action plan presentation meeting. At the meeting, the CSM presents the action plan and proposed targets. With the affirmation of the CLEC representative, the action plan is adopted.

Bernadette Seigler asked how CLECs are informed of the status of errors, fallouts and incorrect clarifications (defects). According to Dorothy Vallery-BellSouth UNE-P Resale Staff Director, CLECs are notified as soon as BellSouth knows with the use of ERT letters, CCP status, etc. Dorothy will discuss problems that AT&T and Network Telephone are having with USOC MSB in Florida, and will verify when and what kind of notification went out.

The UNE-P User Group Action Plan was reviewed.

The presentations made by members of the LCSC and LCSC operations staff and Ranae Stewart were designed to provide resolution to action item 1. Action item 1 will remain open until the single C-order for UNE-P conversions is implemented in the second quarter of 2002.

Action item 13 will remain open while progress on Change Control CR0459 is being monitored.

Action item 20 has new ECD of December 31, 2001.

Action item 29 is pending closure with ITC^DeltaCom (will provide examples) as the sole owner.

Action item 42 will remain open while progress on Change Control CR0461 is being monitored.

Action item 51 is pending closure. NewSouth and IDS Telcom will be contacted to OK closure.

Action item 57 will remain open until the LSR flow-through matrix has been updated.

Action item 63 will remain open until MCIWorldCom receives ERT letter regarding missing notifiers. Hold file errors are being addressed on Change Control CR0443.

Action item 66 will remain open. AT&T will continue to provide examples through December 31, 2001.

Action item 69 will remain open while Jim Maziarz-BellSouth Product Manager and Sharon Eleazer of TalkAmerica review list of USOCs.

Action item 72 will remain open while effects of USOC 1LS11 are investigated. Sandra Davis-BellSouth LCSC UNE-P Staff Manager advised that BellSouth is putting in an edit to strip these USOCs and prevent them from being carried over, until a feature is worked. ECD for feature will be provided. Jim Maziarz will work

with Momentum Business Solutions through their action manager to help resolve billing disputes since they cannot EBD back to the order date.

Action item 73 is pending closure. North American Telecommunications will be contacted to OK closure.

Action item 75 will remain open until the BellSouth Business Rules are updated February 28, 2002.

Action item 76 will remain open until reps in the Fleming Island LCSC are covered on CSR correction process. This coverage should be completed no later than February 1, 2002,

Action item 79 will remain open. Network Telephone will provide examples. They have experienced new number on order may be out and when they try to enter in TAFI it shows as "unassigned" or similar. Scott Woolard-BellSouth Manager advised them to contact the CWINS non-design group. LMOS has 24-48 hour delay being updated from SOCS.

Action item 80 will remain open. According to Sandra Davis, a feature has been opened but not worked. No ECD is targeted since it is not considered a high priority.

Action item 86 was closed. CLECs can contact DSG (Digital Subscriber Group) at 888-701-2375 option #1 to identify the DSL provider. This information needs to be provided to Dorothy Vallery so that she can develop a process to identify retail DSL provider and issue carrier notification.

Action item 87 was closed.

Action item 89 will remain open until a process is developed. The target date is the end of the first quarter of 2002.

Action item 91 was closed.

Action items 92 through 95 were added.

According to Bernadette Seigler, Change Control CR0520 for Due Date Calc has been scheduled for April 7, 2002. She has escalated for a better date and encouraged other CLECs to do the same.

The UNE-P meeting minutes, updated rules of engagement, action plan and member directory, and presentations will be posted on the website by December 14, 2001.

UNE-P user group meetings will be scheduled for 2002 taking into account Change Control meetings that meet the last Tuesday of the quarter. They will be scheduled for the second month (conference bridge only) and the last Tuesday of the third month (in person and conference bridge) of the quarter. The Facilitator is working on the logistics for location of the meetings. When all is finalized, the meeting notices will be posted via BellSouth's Interconnection website. Attendees were asked to submit completed feedback surveys. Those on the conference bridge were asked to submit theirs either by fax to 770-936-3789 or to Ellen Shepard by e-mail.

UNE-P USER GROUP ATTENDEES

December 6, 2001

AT&T	Bernadette	Seigler
AT&T	Ray	Sinclair
Birch Telecom	Nicole	Dreier
Birch Telecom	Mel	Wagner
Broadslate Networks	Marshall	Bowden
Broadslate Networks	Jim	Cummings
Cinergy Communications	Kiki	Deboe
Contact Network Inc.	Michele	Boner
CTC Exchange Services	Bill	Czolba
EPB Telecommunications	Dale	Donaldson
ISN Communications	Simona	Thomas
ITC^DELTA COM	Dawn	Hamm
ITC^DELTA COM	Dena	Hyatt
LaunchNow/Accenture	Tami	Swenson
Lightyear Communications	Phil	Candella
Lightyear Communications	Michael	DeKorte
MCIWorldcom	Amanda	Hill
MCIWorldcom	Caren	Schaffner
Momentum Business Solutions Inc.	Peggy	McKay
Network Telephone	Chris	Aversano
Network Telephone	Tony	Barcellona
Network Telephone	Clexton	Middleton
Network Telephone	Margaret	Ring
Network Telephone	Claudia	Wickersham
North American Telecommunications	Daryl	Nathanson
Rent A Line Telephone Company	Daniel	Martinez
TalkAmerica	Sharon	Eleazer
TalkAmerica	Page	Miller
Var-Tec Telecom	Kraig	Nielsen
Var-Tec Telecom	Ken	Schneer
Velocity Network of Kentucky Inc.	Laura	Edwards

UNE-P USER GROUP ATTENDEES
December 6, 2001

BELLSOUTH PARTICIPANTS

Dottie Amerson
Rita Barrett
Nicole Bracy
Georgia Christenas
Connie Coley
Michelle Culver
Sandra Davis
Shelly Decker
Rendy Dinovo
Margaret Garvin
Theresia Gentry
Farris Huff
Richard Lee
Meena Masih
Jim Maziarz
Janet Miller Fields
Matt Musko
Tom Roberts
Gary Romanick
Ellen Shepard
Brenda Simmons
Ranae Steward
Allan Tarr
Audrey Thomas
Dorothy Vallery
Steve Vanderburg
Marv Watts
Scott Woolard

Attachment 6

From: Seigler, Bernadette M (Bern) - NCAM [bseigler@att.com]
Sent: Friday, February 08, 2002 1:22 PM
To: ellen.m.shepard@bellsouth.com; Garvin, Margaret; Gary.Romanick1@bridge.bellsouth.com
Cc: Cain, Donna - NCAM; Bobik, Richard A - NCAM
Subject: Cust with ADL11 USOC

Importance: High

Hello Gary, Ellen and Margaret,
Donna Cain on my team called the BS DSL Services Group at 888-701-2375 and choose Option one as we were instructed at the December 6th UNE P User's Group Meeting to determine the DSL provider on our customer's CSR.

When an agent finally answered her call, she asked BST to check a number for her to tell her what DSL service the customer had with what provider. The BST Agent told her she doesn't have the capability to do that. When Donna asked who could be able to answer those questions, the agent responded "she had no idea".

So where do we go from here when our customer tells us they do not have DSL yet a DSL USOC appears on their CSR?
Has a process been developed by Dorothy Vallery whereby this toll-free number above would get us the answers we need?

> Please note that Option 1 off this toll-free number was actually to check
> the status of a service order. The other options were for technicians who
> are having problems.

>

The two numbers Donna was calling about are 770-975-7921 and 770-997-0800. Per LENS both have the ADL11 USOC on their records. Your definition from the USOC doc is below:

ADL11- Asymmetric Digital Subscriber Line (ADSL) Service, ADSL virtual circuit with data rates up to 1.5 Mbps downstream and up to 256 Kbps upstream, provisioning only, zero rate

Your quick attention to this request is appreciated.

Thank you,

Bernadette Seigler
District Manager
AT&T Local Services & Access Management
So. Region OSS Interconnection
V: 404-810-8956
F: 404-810-8605
Pager: 888-858-7243 Pin: 125159

From: Seigler, Bernadette M (Bern), NCAM [bseigler@att.com]
Sent: Friday, February 22, 2002 1:16 PM
To: Gary.Romanick1@bridge.bellsouth.com
Cc: Bobik, Richard A, NCAM; Cain, Donna, NCAM; Margaret.Garvin@bridge.bellsouth.com
Subject: RE: Cust with ADL11 USOC

Gary,
I just spent 11 minutes on the phone at the DSL number, 9 of which were on hold.

BST rep, Natash, told me that she can see who the internet service provider is for 404-296-4534, yet cannot tell me who it is. All managers are in a meeting and that I should call back in 20 minutes to talk to one of them.

Is the meeting in progress the one covering them on how their teams should give us the name of the internet services provider?

Needless to say, I am quite frustrated with this poor process.

I look forward to your reply.

Bernadette Seigler
District Manager
AT&T Local Services & Access Management
So. Region OSS Interconnection
V: 404-810-8956
F: 404-810-8605
Pager: 888-858-7243 Pin: 125159

-----Original Message-----

From: Seigler, Bernadette M (Bern), NCAM
Sent: Friday, February 22, 2002 1:07 PM
To: 'Gary.Romanick1@bridge.bellsouth.com'
Cc: Bobik, Richard A, NCAM; Cain, Donna, NCAM; Margaret.Garvin@bridge.bellsouth.com
Subject: RE: Cust with ADL11 USOC

Gary-
So the process is to
1) AT&T calls this DSL 888 number to discern who is the DSL provider associated with the USOC on our end user's account.
2) have the end user call the DSL provider and request that the USOC be removed - which makes them lose their internet provider. Once the call is made, how long does this step take?
3) after the USOC is removed, only then can AT&T submit the UNE P order.

Did I capture that right? When will the DSL reps answering this 888 number be re-trained on this process? We have real customer orders that must move forward ASAP.

The process outlined above is surely not a customer friendly/end user focused process. This process sure feels like a roadblock to fair competition.

Why does BST have the policy that UNE P is not compatible with DSL service? It is certainly technically feasible, yet you choose not to allow it. Will you please explain?

Bernadette Seigler
District Manager
AT&T Local Services & Access Management
So. Region OSS Interconnection
V: 404-810-8956
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Pager: 888-858-7243 Pin: 125159

-----Original Message-----

From: Gary.Romanick1@bridge.bellsouth.com
[mailto:Gary.Romanick1@bridge.bellsouth.com]
Sent: Wednesday, February 20, 2002 5:56 PM
To: Seigler, Bernadette M (Bern), NCAM
Cc: Bobik, Richard A, NCAM; Cain, Donna, NCAM;
Margaret.Garvin@bridge.bellsouth.com;
Gary.Romanick1@bridge.bellsouth.com
Subject: Cust with ADL11 USOC

Bernadette,

Dorothy Vallery and myself have rechecked the information provided during the December 6, 2001 UNE-P meeting. We were advised that by calling the DS Group CLEC's will be advised who the DSL provider is, this was probably just an isolated incident. We did ask that representatives answering the phones be recovered on the policy. This message was sent out today, so please allow for some circulation time. If in the mean time this should occur again, please ask to speak with a supervisor.

Again this information is correct, please call the BS DSL Services Group at 888-701-2375 to determine the DSL provider on our customer's CSR.

Gary Romanick

From: Seigler, Bernadette M (Bern), NCAM [bseigler@att.com]
Sent: Monday, February 25, 2002 4:10 PM
To: Gary.Romanick1@bridge.bellsouth.com; Margaret.Garvin@bridge.bellsouth.com
Cc: aclemons@ci2.com; ahburns@talk.com; amanda.hill@wcom.com;
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walter.carnes@accesscomm.com; wcengstrom@vartec.net; Cain, Donna, NCAM; Bobik,
Richard A, NCAM; Bradbury, Jay M, LGA; tyra.hush@wcom.com;
mconquest@itcdeltacom.com; Jim.Maziarz@bridge.bellsouth.com

Subject:

RE: Cust with ADL11 USOC - UNE P USER Group ACTION ITEM #86



RE: Cust with ADL11

USOC

CLECs - How are you handling this issue with your customers that have such ADL11 USOCs on their CSRs and BST will not process your order to convert them to UNE P until this USOC is removed?

Please see attached emails for additional details as I have been working this issue since Feb 8th with Gary and Margaret.

Gary and Margaret,
Please re-open Action Item #86 and add it to our agenda for our Feb 28th UNE P User Group agenda.

I called the BST DSG number a few times Friday, 2/22 and was not given the DSL provider for my customers that want to move to AT&T.

At 4:20 PM on Friday 2/22, I finally spoke with Jamie White, a BST manager in the DSG. He admitted Friday was the first he learned about this process and didn't have answers to give me as yet however he committed to call me later Friday with answers. He did not keep that commitment on Friday, nor did he call me this morning.

I called the DSG 888-701-2375 number again today at 12:58 PM. After holding I was able to speak with Jamie White. He apologized for not calling me Friday as he committed. He said he received answers too late on Friday to call.

The answer he gave me was that he/his DSG group was not able to tell AT&T who the ISP is for any of these customers AT&T needs to move to UNE P. He told that me I needed to contact Jennifer Kendall, BST Interconnect Services Marketing at 404-927-3753 or get my account team to contact Jennifer to get the process I need for the identification of the ISP. He assured me that Jennifer knew this work item was hers and would expect a call.

So BellSouth - How is it that BST provided this process to CLECs at the December 6th UNE P User group meeting when evidently there never was such a process in place at BST? The very managers who would support this process only learned about it on Friday, Feb 22nd...11 weeks after it was provided to CLECS?

I look forward to your explanation and a real process that works.

Bernadette Seigler
District Manager
AT&T Local Services & Access Management
So. Region OSS Interconnection
V: 404-810-8956
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Pager: 888-858-7243 Pin: 125159

-----Original Message-----

From: Gary.Romanick1@bridge.bellsouth.com
[mailto:Gary.Romanick1@bridge.bellsouth.com]
Sent: Friday, February 22, 2002 5:32 PM
To: Seigler, Bernadette M (Bern), NCAM

Cc: Bobik, Richard A, NCAM; Cain, Donna, NCAM;
Margaret.Garvin@bridge.bellsouth.com;
Gary.Romanick1@bridge.bellsouth.com
Subject: RE: Cust with ADL11 USOC

Bernadette,

I am sorry about the level of service that you received. I have forwarded your e-mail on regarding your hold duration. Also, I am having the process reviewed about obtaining the information around the DSL provider.

Lastly, I will open up a new action item concerning UNE-P compatibility with DSL.

Gary Romanick

From: Seigler, Bernadette M (Bern), NCAM [bseigler@att.com]
Sent: Friday, March 01, 2002 9:59 AM
To: Margaret.Garvin@bridge.bellsouth.com; Gary.Romanick1@bridge.bellsouth.com; ahburns@talk.com; amanda.hill@wcom.com; andrea.migliassi@lightyearcom.com; annette.hardy@accesscomm.com; anthony.barcellona@networktelephone.net; arf1804@swbell.net; austinl@lightyearcom.com; avincent@cinergycom.com; Banks, Michelle R, NLNS; bczolba@emp.ctc.net; bhamilton@idstelcom.com; blocks@smokesignal-clec.com; bob.buerrosse@allegiancetelecom.com; bradstaats@iristransport.com; brent.mcmahan@networktelephone.net; brrobi@kmctelecom.com; bseger@onestarid.com; Seigler, Bernadette M (Bern), NCAM; bwellman@idstelcom.com; caren.schaffner@wcom.com; carla.leviner@alltel.com; cassandra.pressley@networktelephone.net; cconnolly@newsouth.com; chad.pifer@xspedius.com; chapmanwe@epb.net; cheryle.valentine@speedeenet.com; chris.aversano@networktelephone.net; chrisp@lightyearcom.com; cindy.deverell@alltel.com; cindyr@lightyearcom.com; claudia.wickersham@networktelephone.net; clextonm@networktelephone.net; cmiller@telepak.net; csickler@itcdeltacom.com; dana@speedeenet.com; danymart@aol.com; david.sered@kmctelecom.com; dcampbell@itcdeltacom.com; deborah.whitaker@wcom.com; dgoodly@xspedius.com; dhamm@itcdeltacom.com; dhyatt@itcdeltacom.com; dking@itcdeltacom.com; dlane@gwaycom.net; dlemunyon@nwp.com; dmanoochehri@talk.com; dnathanson@natelcomm.com; donaldsondd@epb.net; donna.williams@kmctelecom.com; fabian.spenser@kmctelecom.com; gene@hom.net; gerrig@lightyearcom.com; gknigh@kmctelecom.com; Lancaster, Geri L, NCAM; james.childress@lecstar.com; jan.dumas@accesscomm.com; jared.welch@accesspointinc.com; jashburn@emp.ctc.net; jasonbr@lightyearcom.com; jeannie.seguin@adelphiacom.com; jfury@newsouth.com; jharlan@aeneas.net; jhudson@itcdeltacom.com; jim.cummings@broadslate.net; jkramer@birch.com; jmcmurry@norcomld.com; jnh@atlantic.net; joanne.baxter@networktelephone.net; joe.clark@nowcommunications.com; joes@networkonecom.com; john.u.anthony@alltel.com; jose.aguilar@btele.com; kanielse@vartec.net; karen.bellow@xspedius.com; kdeboe@cinergycom.com; kevin.shady@lightyearcom.com; kschneer@vartec.net; ksharp@itcdeltacom.com; kventurini@onestarid.com; lavarus.kornegay@btele.com; leah.howard@globalcrossing.com; ledwards@velocityky.com; lhamlin@birch.com; lmadere@eatel.com; lmccray@talk.com; louise.wilds@accesscomm.com; margaret.ring@networktelephone.net; marshall.bowden@broadslate.net; maurice@mgaai.com; mbjohn@kmctelecom.com; mboner@inline.com; mconquest@itcdeltacom.com; mer@cinergycom.com; michael.dekorte@lightyearcom.com; michelle.boger@lightyearcom.com; mitch.dantin@networktelephone.net; mitch.miguez@networktelephone.net; Thompson, Mary L, NPONS; mr3247@sbc.com; mwagner@birch.com; nbustin@gulfpines.com; ndreier@birch.com; nfuchs@kmctelecom.com; nicole.mckoy@wcom.com; nina.heath@btele.com; pagemiller@talk.com; Powell, Patricia (Pat), CSLOC; pauline.frye@kmctelecom.com; philipc@lightyearcom.com; pittsps@accessam.com; pmckay@momentumbusiness.com; rde1812@swbell.net; rent-a-line@mindspring.com; rhonda.calvert@adelphiacom.com; rick.whisamore@wcom.com; rmcdaniel@durocom.com; rwilson@ci2.com; saarnold@aeneas.net; satcomcc@yahoo.com; sbaughman@intermedia.com; schapman@talk.com; scott.kassman@kmctelecom.com; seleazer@talk.com; Fette, Susanne (Sue), NLNS; sgoodfellow@onestarid.com; shane@eatel.com; sheryl_scobel@stratosoilandgas.com; simonat@onisn.net; speters@vartec.net; stapler@itcdeltacom.com; stevec@networktelephone.net; sthacker@att.com; stuwalters@usa.net; tallen@ci2.com; tami.m.swenson@accenture.com; tcorrell@natelcomm.com; telcom2@bellsouth.net; terry.romine@adelphia.com; tim.koontz@networktelephone.net; tina.general@kmctelecom.com; tjharrington@natelcomm.com; tmgray@vartec.net; tonya.garland@alltel.com; walter.carnes@accesscomm.com; wcengstrom@vartec.net; Cain, Donna, NCAM; Bobik, Richard A, NCAM; Bradbury, Jay M, LGA; tyra.hush@wcom.com; mconquest@itcdeltacom.com; Jim.Maziarz@bridge.bellsouth.com
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Subject: ADSL issue - STILL NEED A PROCESS - sys fix could be as early as 2003 for CR0625

Importance: High

Margaret,

As I reiterated yesterday, I am disappointed that BellSouth has not provided a process that works for CLECS in the identification of the DSL provider associated with ADL11 on a customer's CSR when the customer doesn't believe that he has an ADSL service. The BellSouth Digital Services Group can identify the ISP and so calling them surely could have met CLECs need if BellSouth had implemented the process as it was described to CLECs on December 6, 2001.

BellSouth recognized the need for a process back in December and provided a process albeit poorly implemented. Yesterday your LCSC people stated this process was provided in good faith. If that is the case, how is it that when BellSouth learns this process isn't working that BellSouth does not provide a working process in its place?

It is good to hear that BellSouth is following the CCP process and is investigating a systems solution as was requested in CR0625. CLECs were told that an update would be provided at the March 26th UNE P User Group Meeting. CLECs need a solution, not just an update.

Until a systems solution is delivered - which could be as early at 2003 since the BellSouth release plan for 2002 is already booked through November 2002 - CLECs need some other process to address this situation in the interim.

When will BellSouth provide a working process to CLECs to address our need?

Bernadette Seigler
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AT&T Local Services & Access Management
So. Region OSS Interconnection
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Attachment 7

**Eighteen AT&T Customers Whose
UNE P Purchase Orders
Were Rejected Because
Their CSR Included
ADL11 USOC Code**

N0222524350
N0238918252
N0289946263
N0247620523
N0210403524
N0275784954
N0285965815
N0240669915
N0245514555
N0257864854
N0285879866
N0249187948
N0202381456
N0298634988
N0265561702
N0236494386
N0242212083
N0291168901