

1                   **BEFORE THE COMMONWEALTH OF KENTUCKY**  
2                                   **PUBLIC SERVICE COMMISSION**  
3                   **REBUTTAL TESTIMONY OF JOHN B. COLEMAN**  
4                                   **ON BEHALF OF**  
5                   **AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.**  
6                                   **AND TCG OHIO, INC.**  
7                                   **CASE NO. 2001-105**  
8                                   **JULY 9, 2001**

9    **I.     INTRODUCTION AND QUALIFICATIONS**

10 **Q.    PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.**

11 **A.**My name is John B. Coleman and my business address is 188 Inverness Drive  
12        West, Englewood, Colorado, 80112. I am employed with AT&T Broadband as a  
13        Vice President for Operations AT&T Broadband Cable Affiliates Services  
14        division within AT&T Broadband. AT&T Broadband is an operating division  
15        within AT&T Corp. This testimony is filed on behalf of AT&T Broadband,  
16        AT&T Communications of the South Central States, Inc., and TCG Ohio, Inc.  
17        (collectively referred to as "AT&T").

18 **Q.    PLEASE SUMMARIZE YOUR BACKGROUND AND PROFESSIONAL**  
19 **EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY.**

1 A. I received a Bachelor of Arts Degree in Mathematics from Alabama State  
2 University located in Montgomery, Alabama. I received a Masters of Business  
3 Administration Degree from the University of Central Florida in Orlando, Florida.

4 My telecommunications career began in 1978 with South Central Bell in  
5 Birmingham, Alabama as a Systems Programmer. During my 23-year tenure with  
6 AT&T, I have also held various assignments in Orlando, Florida, Lake Mary,  
7 Florida and Knightsbridge, New Jersey. Those assignments have included key  
8 positions in Information Systems, Technical Support, Business Continuity  
9 Support, and Network Operations organizations. In 2000, I joined AT&T  
10 Broadband as a Vice President for Operations and I am responsible for, among  
11 other things, implementing and managing the network infrastructure to support  
12 AT&T's national strategy to deliver ubiquitous and competitive residential All  
13 Distance Digital Telephony services through affiliate relationships with the  
14 leaders in the Cable and Entertainment Industry. Further, I am directly  
15 responsible for implementing and managing the network infrastructure to support  
16 AT&T's local service offering in Louisville, Kentucky to provide local residential  
17 telecommunications through a partnering relationship with the local Louisville,  
18 Kentucky cable provider, Insight Communications Company, Inc. ("Insight").

19 **Q. HOW DOES AT&T OFFER TELECOMMUNICATIONS SERVICES IN**  
20 **KENTUCKY?**

21 A. AT&T has built a fiber network in Kentucky that carries both voice and data  
22 traffic. AT&T has formed a partnership with Insight to allow AT&T to deliver  
23 this residential telecommunication service over Insight's cable facilities to the  
24 customers. Insight provides the necessary facilities to connect to the customer  
25 and AT&T provides the telecommunications network and services. AT&T's

1 offering to local residents in the Louisville, Kentucky area is known as “AT&T  
2 Digital Phone Service.”

3  
4 AT&T must interconnect its network with BellSouth’s network to allow AT&T  
5 customers to send calls to and receive calls from BellSouth customers. AT&T  
6 also must order local number portability (“LNP”) from BellSouth using  
7 BellSouth’s Operational Support Systems (“OSS”) when new AT&T customers  
8 want to keep their same telephone numbers when switching carriers.

9 **II. PURPOSE AND SUMMARY OF TESTIMONY**

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
11 **PROCEEDING?**

12 A. I am submitting this testimony on behalf of AT&T to address whether BellSouth  
13 provides nondiscriminatory interconnection, nondiscriminatory access to  
14 unbundled network elements, and number portability as required by Checklist  
15 Items Nos. 1, 2 and 11, 47 U.S.C. § 271 (c)(2)(B)(i), (ii) and (xi). AT&T has  
16 been unable to obtain interconnection in accordance with the requirements of  
17 §§ 251(c)(2) and 252(d)(1), nondiscriminatory access to BellSouth’s OSS, or  
18 local number portability as required by § 271(c)(2)(B)(xi). The problems AT&T  
19 has faced include:

- 20 • BellSouth has caused AT&T customers to endure “dead air” problems for  
21 long periods of time without resolution.
- 22 • BellSouth’s process for provisioning LNP is deficient causing AT&T  
23 customers to suffer inferior service, including an inability to receive

1 inbound calls after switching to AT&T, receipt of bills from BellSouth for  
2 service for the time period after the customer switched to AT&T, *i.e.*,  
3 “double bills,” and reassignment of an AT&T customer’s existing  
4 telephone number to a new BellSouth customer.

- 5 • BellSouth has cancelled confirmed appointments for number porting the  
6 day before the appointment causing AT&T to have to notify its new  
7 customers that their service would not be switched to AT&T the next day  
8 as expected and that AT&T could not tell them when the switch to AT&T  
9 would occur.

10 These problems, and the manner in which BellSouth has responded to AT&T  
11 when the problems occur, demonstrate that BellSouth does not provide  
12 interconnection, access to unbundled network elements or local number  
13 portability as required by the Telecommunications Act of 1996. Accordingly, this  
14 Commission should not recommend BellSouth for authority to provide  
15 interLATA services under Section 271 of the Act.

16 **Q. WHAT DO CHECKLIST ITEM NOS. 1, 2 AND 11 OF SECTION 271**  
17 **REQUIRE?**

- 18 A. To obtain authority to provide in-region interLATA services, BellSouth must  
19 prove that it has met the requirements of the competitive checklist in Section 271.

20 Checklist item 1 requires BellSouth to provide nondiscriminatory interconnection.  
21 47 U.S.C. § 271(c)(2)(B)(i). Interconnection must be “at least equal in quality to  
22 that provided by the local exchange carrier to itself . . . or any other party to which  
23 the carrier provides interconnection.” 47 U.S.C. § 251(c)(2).

1 Checklist item 2 of Section 271, Nondiscriminatory Access to Unbundled  
2 Network Elements, requires BellSouth to provide competitive local exchange  
3 carriers (“CLECs”) with adequate access to BellSouth’s network elements and  
4 processes. 47 U.S.C. § 271(c)(2)(B)(ii). Adequate access to BellSouth’s network  
5 elements includes the systems, databases and personnel that BellSouth employs to  
6 process customers’ (and other competing carriers’) orders for telecommunications  
7 services, to provide the requested services to their customers, to maintain and  
8 repair network facilities and to render bills. The Federal Communications  
9 Commission (“FCC”) has determined that an ILEC must provide  
10 nondiscriminatory and reasonable access to its network elements in parity to the  
11 access it provides to itself to comply with its duty under Section 251(c)(3).<sup>1</sup> In  
12 addition, the FCC has stated that without adequate access, a competing carrier  
13 “will be severely disadvantaged, if not precluded altogether, from fairly  
14 competing” in the local exchange market. *Id.*

15 Item 11 of the checklist in Section 271 requires BellSouth to provide number  
16 portability. 47 U.S.C. § 271(c)(2)(B)(xi); 47 U.S.C. § 251(b)(2). The Act defines  
17 number portability as “the ability of users of telecommunications services to  
18 retain, at the same location, existing telecommunications numbers without  
19 impairment of quality, reliability, or convenience when switching from one  
20 telecommunications carrier.” 47 U.S.C. § 153 (a)(46).

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<sup>1</sup> *Memorandum Opinion and Order, Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, CC Dkt. No. 99-295, FCC 99-404, 1999 WL 1243135 (rel. Dec. 22, 1999).

1 **Q. DOES BELLSOUTH SATISFY CHECKLIST ITEMS 1, 2 AND 11?**

2 A. No. AT&T began offering residential local telephone service in Louisville,  
3 Kentucky on January 22, 2001. This offering has been made on a controlled basis  
4 to ensure that all systems and procedures are working and providing customer  
5 service at or above the level of customer service BellSouth provides to its  
6 customers. During the five and a half months AT&T has offered service in  
7 Kentucky, BellSouth's provisioning of interconnection, access to unbundled  
8 network elements, and local number portability for new AT&T customers has  
9 proved inadequate and has severely hampered AT&T's efforts to compete for  
10 local service. Because first impressions are lasting impressions, customers  
11 experiencing these initial difficulties when they begin AT&T service will  
12 reconsider changing local providers.

13 **Q. PLEASE DESCRIBE THE EXTENT OF THE IMPACT OF**  
14 **BELLSOUTH'S DEFICIENCIES ON AT&T'S CUSTOMERS.**

15 A. As a new competitor attempting to compete over its own facilities, AT&T is  
16 nonetheless dependent on BellSouth for interconnection and number portability at  
17 the time of the transition. If the transition is difficult or the customers loose  
18 service shortly after the transition, they are likely to return to BellSouth, and they  
19 may never again attempt to change local carriers. In fact, AT&T's new customers  
20 have suffered problems as a result of BellSouth's deficiencies and BellSouth's  
21 failure to cooperate fully with AT&T in resolving these deficiencies has caused  
22 serious problems for AT&T's new customers. For example, for a nearly two  
23 week period, approximately 16% of AT&T's customers during that period  
24 experienced "dead air" when they picked up the telephone. This "dead air"  
25 problem persisted for 13 days from the time it was first reported to BellSouth by  
26 AT&T as a potential problem in BellSouth's network. Similarly, BellSouth's

1 number porting problems which have resulted in the customer's inability to  
2 receive inbound calls or double billing have impacted over 10% of AT&T's new  
3 customers. The "actual" percentage of customers impacted for some period of  
4 time may be much higher as many customers may not have been aware of the  
5 problem or AT&T was able to correct the problem before the customer actually  
6 reported the trouble.

7 **III. DEFICIENCIES IN BELL SOUTH'S METHODS AND PROCEDURES**  
8 **FOR INTERCONNECTION AND LOCAL NUMBER PORTABILITY**

9 **Q. PLEASE DESCRIBE THE TYPES OF PROBLEMS EXPERIENCED BY**  
10 **AT&T SINCE ITS ENTRY INTO THE KENTUCKY LOCAL SERVICE**  
11 **MARKET.**

12 A. As described in the beginning of my testimony, AT&T has only been in the  
13 market for five and a half months. Throughout that time, AT&T has experienced  
14 one problem after another with BellSouth that negatively impacts AT&T's ability  
15 to provide service to its customers. These problems were caused in part by  
16 BellSouth's OSS and in part by BellSouth's deficiencies in providing local  
17 number portability. Each of these problems jeopardizes AT&T's ability to  
18 acquire and maintain customers. Viewed on a continuing basis, these problems  
19 with BellSouth portray a process that demands significant improvement before  
20 AT&T can effectively compete with BellSouth in the local service market.

21 **Q. HOW HAS EACH OF THESE PROBLEMS AFFECTED AT&T'S**  
22 **ABILITY TO COMPETE FOR LOCAL SERVICE?**

23 A. Because of BellSouth's problems, AT&T's efforts to build a reputation as a  
24 trusted and reliable service provider are inappropriately and unfairly impeded.

1 For instance, as a direct result of BellSouth's deficiencies, AT&T has lost several  
2 frustrated customers. Indeed, BellSouth has directly benefited from its  
3 deficiencies as such frustrated customers have little choice but to switch back to  
4 BellSouth. In other cases, AT&T has been forced to offer incentives such as free  
5 cellular phone service until the problems are corrected, or additional discounts to  
6 retain customers. In essence, BellSouth's deficiencies almost certainly ensure that  
7 BellSouth's monopoly on local service will be sustained.

8 **A. Dead Air**

9 **Q. YOU MENTIONED THAT THESE PROBLEMS OCCURRED OVER**  
10 **TIME. WHAT WAS THE FIRST PROBLEM THAT AT&T**  
11 **ENCOUNTERED IN KENTUCKY?**

12 A. Deficiencies in BellSouth's network and BellSouth's inability to address those  
13 problems caused AT&T customers to endure "dead air" for almost three weeks  
14 because of BellSouth's failure to adequately test, maintain and repair network  
15 elements serving AT&T customers.

16 **Q. HOW DID AT&T LEARN ABOUT THE "DEAD AIR" PROBLEM?**

17 A. On March 16, 2001, Insight received the first complaint involving incomplete  
18 calls to AT&T local customers. Specifically, AT&T customers reported that  
19 individuals calling their home telephone numbers would hear a single ring and,  
20 when the AT&T customer picked up the telephone, they would hear only silence  
21 or "dead air." Only calls that originated on the BellSouth local network were  
22 impacted.



1 Following the methods and procedures for solving these types of problems,  
2 Insight created trouble tickets and sent them to the AT&T local Network  
3 Operations Center (“NOC”) for investigation. The AT&T NOC thoroughly  
4 checked the AT&T network for trouble and found no problems; however,  
5 customers continued to experience problems.

6 **Q. DID AT&T NOTIFY BELLSOUTH ABOUT THE “DEAD AIR”**  
7 **PROBLEM?**

8 A. Yes. Unable to find any failure on the AT&T network, AT&T contacted  
9 BellSouth and filed a trouble ticket (Ticket No. KI015929) on March 23, 2001, in  
10 accordance with BellSouth’s OSS methods and procedures, to determine if the  
11 problem was in the BellSouth network.

12 **Q. DID BELLSOUTH COOPERATE WITH AT&T TO EXPEDITIOUSLY**  
13 **REMEDY THE “DEAD AIR” PROBLEM?**

14 A. No. After submission of the first trouble ticket, instead of cooperating in testing  
15 and investigatory procedures with AT&T, BellSouth insisted the problem was not  
16 in their network. On April 3, 2001, because the problem was continuing and  
17 AT&T’s investigation continued to point toward a problem in the BellSouth  
18 network, AT&T sent BellSouth another trouble ticket (Ticket No. KI016185).  
19 This second trouble ticket was necessary because BellSouth apparently closed the  
20 first trouble ticket after failing to identify that the problem was in BellSouth’s  
21 network.

22 **Q. WAS THE “DEAD AIR” ISSUE EVENTUALLY RESOLVED?**

23 A. On April 3, 2001, after nearly two weeks of effort by AT&T to convince  
24 BellSouth to adequately investigate BellSouth’s network for problems, BellSouth

1 eventually conceded that the problem was a faulty "T1" card in its Louisville  
2 Armory Place switch. Even then, however, BellSouth did not expeditiously  
3 resolve the problem. The BellSouth technicians advised AT&T that they could  
4 not do the work that evening unless overtime was authorized. Accordingly,  
5 AT&T customers that had been out of service for weeks were out of service one  
6 more night until BellSouth finally replaced the card the next morning. On April  
7 4, 2001, 13 days from the day AT&T issued its first trouble ticket to BellSouth,  
8 this card was finally replaced and the problem was corrected. A summary of the  
9 efforts necessary to obtain resolution by BellSouth is included in the log attached  
10 as Exhibit JBC-1.

11 **Q. WAS THE ROOT CAUSE OF THE PROBLEM EVER UNCOVERED?**

12 A. Based on information obtained during efforts to resolve this problem, AT&T  
13 believes that, prior to the problem occurring, BellSouth had split traffic at the  
14 Armory Place switch, with BellSouth-originated traffic being separated from  
15 non-BellSouth-originated traffic. BellSouth installed a new tandem switch at  
16 Armory Place to carry the separate CLEC traffic. AT&T received no notice of  
17 BellSouth's network change nor any request for assistance from BellSouth to  
18 verify that the network change did not adversely impact local service for CLEC  
19 customers. After nearly two weeks of troubleshooting and numerous requests for  
20 support by AT&T, BellSouth finally tested the newly installed tandem switch in  
21 Armory Place carrying the separate CLEC network traffic and found the faulty T1  
22 card. The faulty "T1" card found on that tandem switch only affected CLEC  
23 network traffic.

1 **Q. COULD BELLSOUTH HAVE AVOIDED THIS PROBLEM?**

2 A. AT&T believes that BellSouth could have avoided this problem. BellSouth could  
3 have tested the new switch before running only CLEC traffic through it. Instead,  
4 BellSouth put AT&T's traffic onto new network facilities without appropriate  
5 testing and without notifying AT&T. Further, BellSouth blamed AT&T's  
6 network for the failures and refused to conduct adequate tests to identify its own  
7 problems even after it was informed of AT&T's concerns.

8 **Q. HAS BELLSOUTH IMPROVED ITS TROUBLESHOOTING PROCESSES**  
9 **AS A RESULT OF THIS EXPERIENCE?**

10 A. No. On May 2, 2001, AT&T sent a letter to BellSouth requesting assurances that  
11 this type of customer-affecting outage would not be repeated. Specifically,  
12 AT&T requested:

13                   assurances that all network level troubles like this one,  
14                   involving blocking or some other customer affecting  
15                   difficulty, will be dealt with on a real time basis, receiving  
16                   the highest priority for resolution, and that the BellSouth  
17                   field forces have a pre-approved process for proceeding  
18                   with the necessary overtime required to resolve customer-  
19                   affecting problems expeditiously.

20                   (See Letter dated May 2, 2001, from Denise C. Berger to Jan Burris (Exhibit JBC-  
21                   2).) Unfortunately, BellSouth's response did not suggest that any corrective  
22                   action has been taken or is planned by BellSouth. (See Letter dated May 24,  
23                   2001, from Randy Jenkins to Denise Berger (Exhibit JBC-3).)

24 **Q. DID THIS "DEAD AIR" PROBLEM ACTUALLY RESULT IN THE LOSS**  
25 **OF CUSTOMERS FOR AT&T?**

1 A. Yes. The “dead air” service interruption resulted in loss of several newly acquired  
2 customers. Of course, such customers are likely to have switched back to  
3 BellSouth.

4 **B. Number Portability Issues**

5 **Q. WHAT IS THE NEXT PROBLEM THAT AT&T ENCOUNTERED IN**  
6 **KENTUCKY?**

7 A. Shortly after the “dead air” issue was resolved, AT&T recognized that a number  
8 of customer complaints and problems likely related to problems in BellSouth’s  
9 porting of customer telephone numbers.

10 **Q. PLEASE DESCRIBE THE NUMBER PORTING PROCESS FOR A**  
11 **CUSTOMER TRANSITION FROM BELLSOUTH TO AT&T IN**  
12 **KENTUCKY.**

13 A. AT&T provides local service over its own network which is interconnected with  
14 BellSouth’s network. Accordingly, AT&T must order local number portability  
15 and directory listings from BellSouth when AT&T acquires a customer from  
16 BellSouth. To initiate the process, AT&T submits an electronic local service  
17 request (“LSR”) to BellSouth through BellSouth’s electronic data interchange  
18 (“EDI”), listing the due date for service initiation, the number(s) to be ported, the  
19 directory listing request, and the name and address of the customer. The  
20 automated nature of this process should, if properly executed, result in an efficient  
21 process with minimal error.

22 When BellSouth receives an LSR, it should electronically issue a functional  
23 acknowledgment (“FA”) to AT&T verifying receipt. After issuing a FA,

1 BellSouth then should respond electronically to the LSR by: (1) accepting the  
2 order and issuing a firm order confirmation ("FOC") designating a date the  
3 number will be ported; (2) rejecting the order and issuing a rejection notice; or (3)  
4 requesting clarification of some aspect of the order and issuing a clarification  
5 notice.

6 When BellSouth issues a FOC, AT&T notifies the Number Portability  
7 Administration Center ("NPAC") database to record that this customer telephone  
8 number will become an AT&T number instead of a BellSouth number on the  
9 designated due date.<sup>2</sup> AT&T also notifies the customer of the date the customer's  
10 new AT&T service will be installed.

11 Once the NPAC database submission has been completed, the number is available  
12 for porting beginning on the listed due date on the FOC (and for 30 days  
13 thereafter).

14 **Q. IS PORTING COMPLETE ONCE AT&T HAS NOTIFIED THE NPAC?**

15 A. No. Once the number is designated as subject to porting to AT&T through  
16 NPAC, AT&T must still rely on BellSouth and the availability of BellSouth's  
17 systems in order to port the number when AT&T initiates service to the customer.

18 **Q. HOW CAN FAILURES IN BELL SOUTH'S METHODS AND**  
19 **PROCEDURES FOR NUMBER PORTABILITY RESULT IN PROBLEMS**  
20 **FOR AT&T CUSTOMERS?**

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<sup>2</sup> The NPAC database and associated porting activities are administered and maintained by a neutral third party, NeuStar.

1 A. BellSouth controls the metro Louisville, Kentucky databases and systems  
2 designed to route calls to the proper switch, which in turn sends the calls to the  
3 customer. BellSouth must receive the NPAC data through these systems and  
4 properly process the routing information before a customer can receive calls to the  
5 ported number. If BellSouth's Local Number Portability ("LNP") system is down  
6 or the routing does not take place for some reason, then the number can be ported  
7 by AT&T, but the individual will not be able to receive any calls until BellSouth's  
8 systems are restored and the routing process completes.

9 BellSouth must also disconnect the number from its system during the porting  
10 process. Failure to do so can cause problems with the service to the customer and  
11 result in, among other things, the customer being unable to receive inbound calls  
12 from customers served by the same BellSouth switch from which the number was  
13 ported. The customer also may be "double billed" for local service by both  
14 BellSouth and AT&T, that is billed appropriately by AT&T because AT&T is  
15 providing service and billed inappropriately by BellSouth because the customer is  
16 no longer a BellSouth customer.

17 Finally, BellSouth must ensure that the customer's phone number, after being  
18 disconnected, is designated as a ported number so that it is not entered in  
19 BellSouth's database of disconnected numbers that are aged and reassigned to  
20 new BellSouth customers.

21 **Q. HAVE AT&T CUSTOMERS SUFFERED EACH OF THESE PROBLEMS**  
22 **IN KENTUCKY?**

23 A. Yes. AT&T has received complaints from customers who could not receive  
24 inbound calls coming from BellSouth customers served by the switch to which the

1 ported telephone number originally belonged. AT&T customers have received  
2 inappropriate bills from BellSouth. Finally, at least one AT&T customer has had  
3 her telephone number reassigned to a new BellSouth customer while the AT&T  
4 customer was still using the number. Without corrective action by BellSouth, this  
5 problem may increase over time as the ported telephone numbers are aged.

6 **Q. HAS AT&T RAISED THESE ISSUES WITH BELL SOUTH?**

7 A. Yes. On May 25, AT&T advised BellSouth of these problems and of AT&T's  
8 view that gaps in BellSouth's porting process caused the problems. (See Letter  
9 dated May 25, 2001, from Denise C. Berger to Jan Burriss (JBC-4).) The letter  
10 provided details on eleven customers and requested an analysis and response by  
11 June 4, 2001.

12 **Q. DID BELL SOUTH RESPOND?**

13 A. Not substantively. On June 5, 2001, BellSouth stated that it was still researching  
14 the issues and would respond at a later date. (See Letter dated June 5, 2001 from  
15 Jan Burriss to Denise C. Berger (JBC-5).)

16 **Q. HAS THE ISSUE BEEN RESOLVED?**

17 A. No. Due to concerns about BellSouth's delay in responding to AT&T's inquiries  
18 on the number porting process, as well as BellSouth's unwillingness to engage in  
19 any discussion of process improvements to avoid a repeat of the "dead air" issue  
20 discussed above, AT&T filed a complaint with this Commission on June 14,  
21 2001.

22 **Q. HAS BELL SOUTH RESPONDED TO THAT COMPLAINT?**

1 A. Yes. Apparently, the filing of the complaint prompted BellSouth to conduct a  
2 much more comprehensive investigation than it had been willing to do in response  
3 to AT&T's letters. The response filed by BellSouth attempts to blame all of the  
4 problems on AT&T. The response, however, is not persuasive. First, BellSouth  
5 criticized AT&T's trouble ticket on the "dead air" issue claiming that AT&T did  
6 not specifically identify the problem trunk group. The only way to tell which  
7 trunk group is used in the BellSouth network is to have BellSouth trace the calls.  
8 BellSouth made no effort to do so. Only after the second trouble ticket when  
9 AT&T finally located someone in BellSouth to troubleshoot the problem, did  
10 BellSouth find the faulty "TI" card in the BellSouth switch. Sufficient  
11 troubleshooting when AT&T submitted the first trouble ticket could have isolated  
12 the problem much earlier. Second, BellSouth blames AT&T for the porting  
13 process problems claiming that AT&T has been submitting incorrect operating  
14 company numbers ("OCNs"). This is not the cause of the porting problems. The  
15 porting problems occurred on orders that had proper OCNs. Moreover, if AT&T  
16 had incorrect OCNs, the LSRs should have been rejected or the porting  
17 notification from NPAC should have been rejected. BellSouth, however, did not  
18 reject the AT&T orders and BellSouth allowed the ports to proceed. BellSouth's  
19 after-the-fact justifications do not change the reality that BellSouth has not  
20 cooperated with AT&T in resolving problems that impact AT&T's customers.

21 **Q. IS BELL SOUTH'S BUSINESS RESPONSE CONSISTENT WITH ITS**  
22 **RESPONSE TO THE COMPLAINT?**

23 A. No. Indeed, on the double billing issue, BellSouth has identified only 54 orders  
24 with incorrect OCNs, AT&T has provided BellSouth with identifying information  
25 for more than 300 customers that may have been negatively impacted. Moreover,  
26 BellSouth has agreed to institute a manual correction to whatever the problem is



1 that results in customers continuing to receive bills from BellSouth after the  
2 customer's service has been transitioned to AT&T.

3 **C. Delays In Providing Service**

4 **Q. WHAT IS THE NEXT PROBLEM THAT AT&T HAS ENCOUNTERED**  
5 **IN KENTUCKY?**

6 A. BellSouth has forced AT&T to reschedule customer transitions less than 24 hours  
7 before the scheduled transition of service to AT&T by advising AT&T that it  
8 would not port the telephone number the next day despite a previous commitment  
9 to do so. This last minute change required AT&T to advise the customers that  
10 their transition to AT&T would not occur the next day as scheduled and that  
11 AT&T could not advise the customer when the transition to AT&T would occur.

12 **Q. HOW ARE THE DATES FOR CUSTOMER TRANSITIONS OF SERVICE**  
13 **SET?**

14 A. As stated above, when a customer wants to keep the same phone number, AT&T  
15 must order local number portability from BellSouth. The number port must  
16 coincide with AT&T's initiation of the customer's AT&T service for the service  
17 to be fully implemented. Accordingly, when AT&T receives a request from a  
18 customer for local service, AT&T submits an LSR to BellSouth for LNP. When  
19 AT&T receives a FOC with a specified due date for that LNP, AT&T schedules  
20 that due date for the customer's service installation. Because installation requires  
21 a visit to the home and the customer to be present, the date of installation is  
22 important to the customer. To remain competitive for the customer's business,  
23 AT&T makes every effort to schedule the installation for the date most convenient  
24 for the customer. Often customers request Saturday installations. AT&T's

1 interconnection agreement with BellSouth permits AT&T to order Saturday due  
2 dates and requires BellSouth to agree to Saturday due dates.

3 **Q. HAS BELLSOUTH REFUSED TO HONOR THOSE DUE DATES?**

4 A. Yes. AT&T had scheduled approximately ten service installations for Saturday,  
5 June 9, 2001. AT&T had issued LSRs and received FOCs from BellSouth with a  
6 Saturday due date of June 9, 2001 for the LNP. Then, on Friday, June 8, 2001,  
7 BellSouth unilaterally advised AT&T that it would be unable to meet that  
8 Saturday due date for those orders. BellSouth did not provide an explanation or a  
9 revised due date. As a result, AT&T was left to call each of its customers to tell  
10 them their new AT&T service would not be installed the next day as expected. At  
11 the time, AT&T was unable to provide the customers with a revised due date  
12 because BellSouth had not yet provided AT&T with a new due date for the LNP.

13 **Q. HOW DO DELAYS IN THE SCHEDULED DATE FOR INITIATION OF**  
14 **SERVICE IMPACT AT&T AND ITS CUSTOMERS?**

15 A. All delays are detrimental to AT&T's ability to compete and customer  
16 satisfaction. Any delay caused by BellSouth's rejection of a scheduled date to  
17 which BellSouth committed in the FOC thwarts the entire concept of mechanized  
18 LSRs and FOCs because it forces AT&T to engage in a laborious, manual order-  
19 by-order process in an often unsuccessful attempt to reschedule the due date for a  
20 time convenient to the customer. Customer confidence in AT&T is eroded  
21 because the customers' first experience with AT&T is the inconvenience of a  
22 canceled installation and a delay in receiving service, each caused by a unilateral  
23 and unwarranted change by BellSouth.

1 Of particular concern are delays that result in the rejection of a Saturday service  
2 installations such as the delay that occurred on June 9, 2001. Because Saturday is  
3 AT&T's busiest installation day and the most convenient day for most customers,  
4 BellSouth's Saturday rejection constituted a significant interference with AT&T's  
5 efforts to provide prompt and competitive service to the local service market.

6 **IV. SUMMARY OF TESTIMONY AND RECOMMENDATION**

7 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

8 A. Errors and inefficiencies in BellSouth's interconnection methods and procedures,  
9 provision of network elements and services, and its number portability process,  
10 have hindered AT&T's attempts to obtain new local service customers from  
11 BellSouth and to service existing customers. In the five and a half months that  
12 AT&T has been attempting to compete using its own network, AT&T has  
13 suffered a string of problems dealing with BellSouth. These problems are  
14 exacerbated by BellSouth's uncooperative attitude in addressing them. The  
15 deficiencies and BellSouth's uncooperative attitude have placed AT&T at a  
16 significant competitive disadvantage to BellSouth. Customers that have selected  
17 AT&T as their local carrier have been forced to endure unreasonable interruptions  
18 in service, delays and other inconveniences that have not been imposed on  
19 BellSouth customers. BellSouth has not given AT&T a meaningful opportunity  
20 to compete in the residential market, and therefore, BellSouth has not met the  
21 requirements of Section 271.

22 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

23 A. Yes.

**Exhibit JBC-1**  
**Log of Activities Relating to Dead Air**

"DEAD AIR" LOG

**Contacts**

<b>AT&amp;T Local Services</b> Steve Wong Chuck Berry Creston Stickle Todd (Switch Technician) Aubry (LNS NOC)	<b>Insight Communications</b> Cindy Ferrel Shannon Harris Marcus Clarissa McGee Bob Lillie David Brown
<b>AT&amp;T Broadband NOC</b> Shay Edmonds Darren Hanson	<b>Adelphia Communications</b> Amanda
<b>BellSouth</b> Kim Fisher (Translations Manager) Mohamed Technicians (Freddie, Chris, Sandy, Donna)	<b>AT&amp;T Broadband Cable Affiliate</b> Greg Chioffi John Coleman Eric Jefferson Felix Ramos

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Exhibit A**

March 21, 2001	<ul style="list-style-type: none"> <li>According to Pam Porter (Broadband NOC) &amp; George (AT&amp;T Local Network Services National Network Center), problem is not in the LNS switch. LNS Trouble ticket number is CIN 200470.</li> </ul>
	<ul style="list-style-type: none"> <li>Adelphia is also experiencing trouble completing calls. They connect to a BellSouth switch.</li> </ul>
March 22, 2001	<ul style="list-style-type: none"> <li>LNS referred TT to TOC (LNS Trunk Operations Center) TT# 131902034.</li> </ul>
	<ul style="list-style-type: none"> <li>Insight (Broadband Telephony partner) reports problem continues. Customers receive dead air when calling AT&amp;T numbers</li> </ul>
	<ul style="list-style-type: none"> <li>LNS reports T1s are clear</li> </ul>
March 23, 2001	<ul style="list-style-type: none"> <li>11:30AM Conference call with Insight. (Participants: Clarissa, David Brown, Stafford Miller, LNS Chuck Berry, BB-NOC Shay Edmonds). Opened trouble ticket with Adelphia #91204 and #90048; BellSouth trouble ticket #K1015929, LNS trouble ticket #CIN200470 (Opened 3/16). BB-NOC reports no problem on the AT&amp;T Network. LNS reports no problem. Trouble believed to be in the BellSouth switch.</li> </ul>
	<ul style="list-style-type: none"> <li>12:30 PM Called BellSouth (Paul X 5477) for status. Ticket referred to Technician no status available.</li> </ul>
	<ul style="list-style-type: none"> <li>1:30 PM Called Bell-South for status. BellSouth is requesting two-six code to help isolate problem. Conference Chuck Berry (LNS). Felix (BB) is trying to find someone with circuit information.</li> </ul>
	<ul style="list-style-type: none"> <li>3:30 PM BellSouth reported that 168 of 336 trunks in a lock out status. BellSouth will continue problem resolution.</li> </ul>
	<ul style="list-style-type: none"> <li>4:30 PM Called BellSouth. Two-six code (trunk group code) = AF192076; Route code = TPMTGJ2LKE. BellSouth reports "No Trouble Found" lockout caused by LNS side of trunk. BellSouth believes there is an open circuit on LNS side.</li> </ul>
	<ul style="list-style-type: none"> <li>4:31 PM Called LNS NOC. Charlie Deck (LNS trunk group 1258) found trunks in "INB" (installation busy) status. Sending request to provisioning that trunks not turned up. Charlie (LNS) paging provisioning.</li> </ul>
	<ul style="list-style-type: none"> <li>5:30 PM Charlie (LNS) called back. Trouble transferred to TOC (Trunk Optimization Center). They have the BellSouth contacts to resolve the issue. Trouble Ticket #132302968.</li> </ul>
	<ul style="list-style-type: none"> <li>5:56 PM Steve Wong (LNS) found that a switch person is scheduled in at 10 PM. I informed him of Charlie's call. Will call Steve (LNS) in one hour and we will call Charlie (LNS) to get status and work on plan.</li> </ul>
	<ul style="list-style-type: none"> <li>6:56 PM Conference call set adding LNS NOC technician. PJOB CINP0000083-96. Switch is being dumped, so we cannot do any work at the moment. All to rejoin call at 9 PM MST. LNS NOC informed us that every other T1 is down.</li> </ul>

	<ul style="list-style-type: none"> <li>♦ Problem fixed.</li> </ul>
March 24, 2001	<ul style="list-style-type: none"> <li>♦ 8:30 AM Insight will have a representative call all affected customers to verify that the problem was fixed.</li> </ul>
	<ul style="list-style-type: none"> <li>♦ 9:30 AM Insight is receiving dead air when calling customers.</li> </ul>
	<ul style="list-style-type: none"> <li>♦ Remedy Ticket numbers, N Riley 758136, Lee Ann Rodgers 761060; Robert Woodruff 757937; M Fields 752003</li> </ul>
	<ul style="list-style-type: none"> <li>♦ 10:36 AM Steve (LNS), Chuck (LNS), Susan (BB-NOC) on conference call. Creston (LNS) from city ops verified all T1s are operational. LNS NOC conference (1 888 834 1091) T1s going to LSVLKYAP2GT are in idle state; all DS0s idle. LD calls working, 7 digits failing, no problems on LNS switch. After discussing action plan, contacted BellSouth for assistance in troubleshooting.</li> </ul>
	<ul style="list-style-type: none"> <li>♦ Performing a test on line side of the LNS switch to isolates the circuit. Oaklona test line to network; Mike from Bell-South checking on trunks.</li> </ul>
	<ul style="list-style-type: none"> <li>♦ BellSouth verified all 366 DS0s are working and ready to test. Will use a customer non-ported number. BellSouth reported customer's number routing to a different Trunk Group. BellSouth calls to numbers complete successfully. Insight customer service still receives dead air when dialing. Tried several more attempts to trap problem with no success. We experience the same problems using a BellSouth telephone number for testing. We are unable to determine cause of failure. Requested head-end tech dispatched. Insight reported head-end tech delayed due to outage. Expect arrival in 30 minutes.</li> </ul>
	<ul style="list-style-type: none"> <li>♦ 2:00 PM Insight is checking on head end tech. Insight reports massive failure on their network. Insight cannot provide technician for 1-2 hours. Bell-South cannot stay on for more than 45-60 minutes. We agreed to disband effort for today. C Magee (Insight) guaranteed a head-end tech for tomorrow. BellSouth agreed to work issue on Sunday, all other team members are willing to continue in the morning. Set up Conference Bridge for 8 AM EST.</li> </ul>

March 25, 2001	<ul style="list-style-type: none"> <li>6 AM Steve (LNS), Mike O'Brian (Oaklona Head End), Mike from BellSouth, Chuck (LNS) on call. Started to do test dial to voice ports. BellSouth to trace and check call path (Test #9973). Attempted test calls to head-end; no problem found. BellSouth called their customer and requested they place a call for tracing. Call not seen at Armory CO. Problem is pointing to 5ESS at 36 exchanges. BellSouth is calling out a 5E person to assist.</li> </ul>
	<ul style="list-style-type: none"> <li>8:00 AM BellSouth 5E tech is checking switch remotely.</li> </ul>
	<ul style="list-style-type: none"> <li>8:13 AM BellSouth test failed. BellSouth found blocking and will get back to us.</li> </ul>
	<ul style="list-style-type: none"> <li>8:50 AM BellSouth fixed problem with the number and say it is line specific. Porting options are to blame.</li> </ul>
	<ul style="list-style-type: none"> <li>9:30 AM Shannon (Insight) can't complete call to remaining 6 customers.</li> </ul>
March 26, 2001	<ul style="list-style-type: none"> <li>Reported trouble that cell phone users cannot complete calls to AT&amp;T customers.</li> </ul>
	<ul style="list-style-type: none"> <li>Talked to BellSouth Mobility. Test call completed successfully. Tech stated that the local calls route to Armory Place switch. BellSouth Mobility routing is OK.</li> </ul>
	<ul style="list-style-type: none"> <li>Called Adelphia for status on their trunk issue. Adelphia verified routing to AP2G2 switch (Armory Place Bell-South).</li> </ul>
	<ul style="list-style-type: none"> <li>Called BellSouth for status on ticket. Kim (BellSouth) informed me that Adelphia might be routing to wrong tandem switch.</li> </ul>
	<ul style="list-style-type: none"> <li>Called Adelphia, Adelphia reported that BellSouth is receiving 13 digits in place of 10. The 502 is being received twice. Adelphia is checking their translations.</li> </ul>
March 27, 2001	<ul style="list-style-type: none"> <li>Called Adelphia regarding their 13-digit problem. Amanda reported that Adelphia translations are ok. Problem has gone away. Adelphia did not make any changes.</li> </ul>
	<ul style="list-style-type: none"> <li>Called Kim Fisher (BellSouth) and asked if they made any changes. Kim said they did not make any changes to Adelphia connection. Kim did say that last week BellSouth tightened up their routing on the tandem. Non-BellSouth customer calls are no longer completed on the local access tandem. All CLECS need to route through the access tandem.</li> </ul>



	<ul style="list-style-type: none"> <li>Talked to Kim (BellSouth) about wireless call routing. He checked with technician and BellSouth corrected a mapping problem in the DMX yesterday. Wireless providers were affected by this problem. All calls should be completing. Kim (BellSouth) believes the problem we are experiencing is due to TCIC codes errors. Requested I have LNS check TCIC codes at the switch.</li> </ul>
	<ul style="list-style-type: none"> <li>Called Nextel for trouble update. Nextel did not work trouble because they were missing information. B. Lillie (Insight) provided Nextel with the missing information.</li> </ul>
	<ul style="list-style-type: none"> <li>Called Creston (LNS), requested he check the TCIC code. Creston replied he needs to contact his trunking group. Will let me know if the find a problem.</li> </ul>
March 28, 2001	<ul style="list-style-type: none"> <li>Called Adelphia. Amanda reports they can dial the numbers without any problems.</li> </ul>
	<ul style="list-style-type: none"> <li>Shannon (Insight) called. Still receiving customer complaints. Cell phones cannot complete calls.</li> </ul>
	<ul style="list-style-type: none"> <li>Called Insight to provision a test NIU on the same node as customer with problem.</li> </ul>
	<ul style="list-style-type: none"> <li>Creston (LNS) reported the TCIC codes are built correctly. LNS does not see any problem with the codes, which match BellSouth.</li> </ul>
	<ul style="list-style-type: none"> <li>Called M. Rogan (Insight) to arrange for a Technician at the test NIU for testing tomorrow. Mike agreed to provide a technician to help with trouble-shooting.</li> </ul>
	<ul style="list-style-type: none"> <li>Called Nextel for trouble status. Nextel reported a tower was out in the area. Informed Nextel problem affects multiple phones and has existed for two weeks. Nextel to refer problem to technician.</li> </ul>
March 29, 2001	<ul style="list-style-type: none"> <li>Called Kim Fisher (Bell-South). Question on routing overflow between tandems. Kim in conference left voice mail message.</li> </ul>
	<ul style="list-style-type: none"> <li>Shannon (Insight) reports still receiving dead air. Conference call with Adelphia. Adelphia reports no problem with their trunks. Shannon attempted test calls from 502-357-4129 to 502-361-4866. Adelphia traced call coming to them and leaving for BellSouth. Shannon tried calling. Seven digits received dead air; 10 digits received message can not complete call. Used 1+ 10 digits and call completed. Adelphia New TT #92271. Amanda will call back shortly with BellSouth trouble ticket number.</li> </ul>

	<ul style="list-style-type: none"> <li>• Called Nextel for status on trouble ticket. Nextel transferred ticket to their Tier 2. Nextel said they have 3-5 day turnaround.</li> </ul>
	<ul style="list-style-type: none"> <li>• B. Lillie (Insight) placed 4 test calls from landline, received dead air.</li> </ul>
	<ul style="list-style-type: none"> <li>• Kim Fisher (BellSouth) returned call. Access tandem does not overflow to local tandem.</li> </ul>
	<ul style="list-style-type: none"> <li>• Provisioning provided non-ported number on node IO01 NEID1002 voice port 690000370.</li> </ul>
	<ul style="list-style-type: none"> <li>• Adelphia (Amanda) called to inform me she opened trouble ticket #KI01675 with BellSouth.</li> </ul>
	<ul style="list-style-type: none"> <li>• Call with Darlene Smith (AT&amp;T LSAM), Edris (BellSouth AT&amp;T account manager), and John Coleman (VP BB Operations). Restated problem to Edris and requested her assistance in finding a management person responsible for Louisville. Edris had Kim Fisher, but we were looking for a higher level of management. Edris to research and supply Darlene with name and telephone number.</li> </ul>
	<ul style="list-style-type: none"> <li>• Pete (BB provisioning) called to inform me test NIU number 502-742-3000 is operational.</li> </ul>
March 30, 2001	<ul style="list-style-type: none"> <li>• Conference call to trouble shoot dead air problem. Participants were Creston (LNS), Amanda (Adelphia), Nathan and Marcos (Insight), Kim (BellSouth) Shea (BB-NOC).</li> </ul>
	<ul style="list-style-type: none"> <li>• Insight repeated test calls using 7 digits then 10 digits then dialing on LD network. Results the same as before.</li> </ul>
	<ul style="list-style-type: none"> <li>• Norman (Insight technician) joined call. Test calls to non-ported number at test NIU successful. Calling ported number receiving intermittent failure.</li> </ul>
	<ul style="list-style-type: none"> <li>• BB-NOC reports high transmit levels from the Inside plant. The NOC believes this is causing the intermittent failure.</li> </ul>
	<ul style="list-style-type: none"> <li>• Contacted J. Knights (Insight); he had transmitted levels reduced. NOC reports transmit levels closer to specification. Test call still receiving intermittent dead air.</li> </ul>
	<ul style="list-style-type: none"> <li>• BB-NOC thinks we have an inside-wiring problem. Norman, (Insight), going to customer location to disconnect customer wiring from NIU.</li> </ul>
	<ul style="list-style-type: none"> <li>• Norman, (Insight), arrived at customer location. Test calls still experiencing intermittent failure.</li> </ul>

	<ul style="list-style-type: none"> <li>• Kim (BellSouth) reported his testing indicates a bad T1 on trunk group 1233. Kim busied-out 1<sup>st</sup> T1. Test calls failed consistently. Enabled 1<sup>st</sup> T1 and busy-out 2<sup>nd</sup> T1. Test calls complete successfully. Trouble positively tracked to trunks between BellSouth and AT&amp;T.</li> </ul>
	<ul style="list-style-type: none"> <li>• Kim Fischer, (Bell-South), indicated LNS needs to replace their T1 card. Creston (LNS) checking for spare card.</li> </ul>
	<ul style="list-style-type: none"> <li>• Creston (LNS) reports he does not have a spare card available. He will try to get a replacement card this afternoon. Second span of trunk group 1233 to remain in busy-out status until LNS can replace card. <i>Note: During the testing of trunks, Insight completed 41 successful test calls to the non-ported test number at the same node where we are experiencing the dead air problem.</i></li> </ul>
	<ul style="list-style-type: none"> <li>• Creston, (LNS), reported that he will not have a spare card until Monday.</li> </ul>
April 2, 2001	<ul style="list-style-type: none"> <li>• Requested BB-NOC take lead on resolving dead air trouble. This exercise will allow BB-NOC to develop process for working with other LECs.</li> </ul>
	<ul style="list-style-type: none"> <li>• Creston, (LNS), called, he is ready to swap card and test connectivity. Shannon from Insight placed test calls and problem continues. Creston requesting BellSouth technician to trouble shoot. Problem is not on AT&amp;T side of the trunk.</li> </ul>
April 3, 2001	<ul style="list-style-type: none"> <li>• BB-NOC starting conference call to work on dead air issue. Shay, Darren, (NOC), Creston, Todd, (LNS), Audrey (TOC), Shannon, Bob Lillie, David Brown (Insight) on call.</li> </ul>
	<ul style="list-style-type: none"> <li>• Audrey (TOC) working on contacting BellSouth to work trouble. BS Trouble Ticket KI016185</li> </ul>
	<ul style="list-style-type: none"> <li>• While waiting for BellSouth, AT&amp;T busied out the good T1 and released the failing T1. Made 10 test calls to non-ported test number and all completed successfully. LNS traced call from Insight to 502-361-4866 routed to trunk group 1233 (24 channels 2<sup>nd</sup> T known defective) call to 502-367-3000 routed to trunk group 1258 (366 members).</li> </ul>
	<ul style="list-style-type: none"> <li>• Mohammed, Donna and Sandy from BellSouth joined the call one hour after the call started.</li> </ul>
	<ul style="list-style-type: none"> <li>• Attempt to swap tone (send 1000 MHz signal) on 1<sup>st</sup> member of 2<sup>nd</sup> span unsuccessful. BellSouth cannot find tone. BellSouth not certain of the terminating point of the circuit in their facility.</li> </ul>
	<ul style="list-style-type: none"> <li>• LNS traced tone through their facility to the outermost point where signal leaves to BellSouth switch. Tone is leaving LNS to BellSouth.</li> </ul>

	<ul style="list-style-type: none"> <li>• BellSouth trying to locate a CO tech to check for tone arriving in BellSouth facility.</li> </ul>
	<ul style="list-style-type: none"> <li>• Donna, Sandy, and Mohammed (Bell-South) dropped off end of their shift. Audrey (TOC) was required to contact BellSouth supervisor to get BellSouth back on call to continue working problem.</li> </ul>
	<ul style="list-style-type: none"> <li>• BellSouth CO tech, Freddie, and Chris to replace Mohammed on call. After finding and reading engineering documents, found circuit entry point, verified tone is received. Diagnostics revealed OOR (Out of range). BellSouth needs to replace card. BellSouth looking for a trained switch tech for the replacement. Freddie not trained.</li> </ul>
	<ul style="list-style-type: none"> <li>• BellSouth reported no technician available until tomorrow. If we want a tech, it requires a call out and we (AT&amp;T) will be charged. Darren (BB-NOC) agreed to continue work in the AM. Bell-South agreed to join us on conference call at 8 AM EST (6 AM MST).</li> </ul>
April 4, 2001	<ul style="list-style-type: none"> <li>• 6:00 AM Call starts with Shay, Darren (NOC) Todd (LNS), and Felix (Broadband) present.</li> </ul>
	<ul style="list-style-type: none"> <li>• 6:20 AM Mohammed reports that BellSouth tech will not be in until 10 AM EST. Audrey (TOC) reminded him we agreed to 8AM EST start.</li> </ul>
	<ul style="list-style-type: none"> <li>• Scott (BellSouth translation supervisor) brought on to escalate BellSouth no show. BellSouth working on getting technicians to work trouble.</li> </ul>
	<ul style="list-style-type: none"> <li>• 6:38 AM Rick (Bell-South) joined call. Scott dropped off call.</li> </ul>
	<ul style="list-style-type: none"> <li>• 6:49 AM Rick found replacement card; trunk will be unavailable during swap (1 or 3 minutes).</li> </ul>
	<ul style="list-style-type: none"> <li>• 6:52 AM Swap complete. LNS swapping tone. Tone swapping successful. OOR condition relieved. Ready for test call.</li> </ul>
	<ul style="list-style-type: none"> <li>• 6:55 AM NOC contacting Insight for test calls.</li> </ul>
	<ul style="list-style-type: none"> <li>• 07:06 AM Called 503-742-3000 from Adelphia. Also Called 502-367-7478. First call is successful. Contacting B. Lillie (Insight) to place cell test call. Asked Stafford (Insight) to place test call to 502 367-7478. BB-NOC and LNS confirming call routing though TG identified as failing trunk group.</li> </ul>
	<ul style="list-style-type: none"> <li>• 7:18 AM Ticket being placed on monitor status for 24 hours.</li> </ul>
	<ul style="list-style-type: none"> <li>• BB-NOC and Insight will identify all related tickets and close. Insight agreed to report any additional calls to the BB-NOC immediately.</li> </ul>
April 5, 2001	<ul style="list-style-type: none"> <li>• Called Insight, no additional problems reported.</li> </ul>

Exhibit JBC-2  
Letter dated May 2, 2001, from Denise C. Berger to Jan Burris



Danielle C. Berger  
District Manager  
Local Supplier Management

1200 Peachtree Street, NE  
Promenade 1, 12th Floor  
Atlanta, GA 30309  
404 810-8844  
FAX 404 810-8477  
PAGER 800 298-0000 PIN 2688550  
EMAIL d Berger@att.com

May 2, 2001

Jan Burriss  
BellSouth Telecommunications  
1960 West Exchange Place  
Suite 200  
Tucker, Georgia 30084

RE: Louisville Amory Place Tandem

Dear Jan:

The purpose of this letter is to request your help in understanding what AT&T believes are process gaps associated with the Louisville Amory Place tandem and the service quality problems that AT&T experienced.

As background, AT&T Broadband experienced a problem in delivering traffic to customers in the Louisville area through the AT&T Insight switch, which began on March 21, 2001. The problem appeared sometime after BellSouth put all of the non-BellSouth originated traffic on a different tandem than the BellSouth-originated traffic. The first thought was that the problem was a bad T-1 card on our side. After additional and ongoing trouble-shooting, during which BellSouth participated, the problem was pinpointed to the BellSouth tandem. On April 3, 2001, the problem was isolated as a plant problem in BellSouth's network, which subsequently required a new T-1 card on BellSouth's side. Unfortunately, the BellSouth technicians stated that they would not do the work that evening unless overtime was authorized and led our personnel to believe that only a BellSouth manager could authorize the overtime. No such manager was available. The BellSouth technicians promised the AT&T operations personnel that they would replace the card the first thing the next morning. Because AT&T's calls were being blocked at the Armory Place tandem, and had been since March 21<sup>st</sup>, BellSouth should have authorized the appropriate overtime immediately to fix this problem. BellSouth finally replaced the T-1 card the morning of April 4, 2001. However, AT&T spent the first hour of the morning trying to find a BellSouth Central Office technician to do the work.



Complaint of AT&T Against BST  
Exhibit H

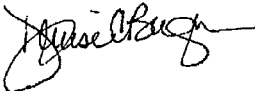
Re: Louisville Armory Place Tandem  
Page 2

The problem did indeed eventually get resolved. However, I need your help in understanding some of the underlying process issues that caused an unnecessary delay in getting resolution to this problem.

I have worked with members of your team and have not been successful in getting the information for which I'm searching. Specifically, AT&T would like assurances that all network level troubles like this one, involving blocking or some other customer affecting difficulty, will be dealt with on a real time basis, receiving the highest priority for resolution, and that the BellSouth field forces have a pre-approved process for proceeding with the necessary overtime required to resolve customer-affecting problems expeditiously.

Please provide me with BellSouth's response no later than close of business May 11, 2001.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Terry", written in a cursive style.

cc: Greg Terry

Exhibit JBC-3  
Letter dated May 24, 2001, from Randy Jenkins to Denise Berger





BellSouth Interconnection Services  
1860 West Exchange Place  
Suite 200  
Tucker, GA 30084

AT&T Regional Account Team  
770-492-7550  
Fax 770-492-9412

May 24, 2001

Ms. Denise Berger  
AT&T Local Services  
Room 12256  
1200 Peachtree St., NE  
Atlanta, Georgia 30309

RE: Louisville Armory Place Tandem

Dear Denise:

This is in response to your letter dated May 2, 2001, requesting a written explanation regarding the alleged process gaps and service quality at the Louisville, Kentucky Armory Place Tandem. You stated that the problem was created when BellSouth moved "non- BellSouth" originated traffic to a different tandem. Following are the results of BellSouth's investigation:

On Wednesday, March 21, 2001, AT&T submitted a trouble ticket to the BellSouth Access Customer Advocacy Center (ACAC) and reported that AT&T's customers, Adelphia Business Solutions and wireless customers, were having dead air problems. BellSouth conducted extensive cooperative testing with AT&T and it was determined that there were no routing or translation problems.

On Tuesday, April 3, 2001 at 1232 Central Daylight Time (CDT), a second trouble ticket was submitted by AT&T to the ACAC indicating "sometimes dead air, please check translations and routing." At 1302 CDT, the BellSouth Network Infrastructure Support Center (NISC) and AT&T conducted tests. Again, it was determined that there were no routing or translation problems, but that a defective T1 card problem existed. At 1640 CDT, the trouble was handed off to the Armory Place Central Office technicians to change out the card. The BellSouth work log in the Central Office indicates that the BellSouth technicians were working on the problem from 1302 CDT through 1721 CDT on April 3, 2001. At 1721 CDT the work log remarks clearly stated that "no access until CLEC ready to start trouble shooting this issue / CLEC will be calling to start." Based on this information, any delays in resolution appeared to be caused by AT&T's failure to properly follow up on agreed upon testing. The trouble ticket was cleared and closed out at 0930 CDT on April 4, 2001.

BellSouth disagrees with AT&T's assertion that BellSouth technicians stated that they would not work that evening unless overtime was authorized. The Armory Place Central Office has personnel on site 24 hours a day during the week. Also, there is a supervisor on call 24 hours a day, 7 days a week. This supervisor is available to authorize call-outs that may be necessary.

Complaint of AT&T Against BST  
Exhibit I

page 1 of 2

BellSouth also disagrees with AT&T's allegation that AT&T experienced 100% blocking during this period because one of the two T1s was not working. BellSouth does not believe that this incident is indicative of gaps or service quality issues in any of BellSouth's Central Offices, especially at Louisville Armory Place.

If you have any further questions regarding this issue, please feel free to contact me.

Sincerely,



Randy Jenkins  
AT&T Account Team

cc: Bill Michael  
Jan Burriss  
Jon Rey Sullivan  
Christopher Barnes

Exhibit JBC-4  
Letter dated May 25, 2001, from Denise C. Berger to Jan Burriss



Denise C. Berger  
District Manager  
Local Supplier Management

1200 Peachtree Street, NE  
Penthouse 11, 12th Floor  
Atlanta, GA 30309  
404 810-8644  
FAX 404 810-8477  
PAGER (RX) 258 0000 PIN 26896588  
EMAIL: dberger@att.com

May 25, 2001

Jan Burriss  
BellSouth Telecommunications  
1960 West Exchange Place  
Suite 200  
Tucker, Georgia 30084

RE: AT&T Insight Customer Problems

Dear Jan:

The purpose of this letter is to ask your assistance in isolating the cause of some problems that are negatively affecting AT&T's customers because of gaps in BellSouth's porting process for residential numbers. Additionally, I would like for your involvement in developing and implementing the necessary improvements to close those gaps.

The attached matrix will give detail on eleven (11) customers, who experienced trouble associated with ported service in Kentucky. As you can see, in these instances, BellSouth failed to complete its activities relative to the number port or placed an intercept message on the customer telephone number in error. In one instance translations in the BellSouth switch were not updated. This is data for only one market. It is imperative that this sort of chronic problem be quickly remedied before additional customers are affected.

I would like to understand the root cause of these continuing problems and BellSouth's plans for an immediate fix.

- What are the gaps in BellSouth's work center Methods & Procedures that are causing these problems to happen?
- What are the gaps in BellSouth's porting process that cause BellSouth's failure to complete the appropriate porting activities?
- What sort of intercept message is placed on customers who port their service to AT&T from BellSouth? Is this a problem unique to porting only orders?



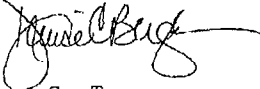
Complaint of AT&T Against BST  
Exhibit J

RE: AT&T Insight Customer Problems  
Page 2 of 2

- BellSouth continues to have problems with translations removal. What causes this and what is the remedy?

I will look forward to your analysis and response no later than Monday, June 4, 2001. Should you be unable to meet that target, please let me when I can expect a response as soon as possible.

Sincerely,

A handwritten signature in cursive script, appearing to read "Greg Terry", with a long horizontal flourish extending to the right.

cc: Greg Terry

LOUISVILLE INSIGHT PROJECT  
CUSTOMER PORTING PROBLEMS

Customer Name	Phone	AT&T Remedy Ticket Number	BellSouth Ticket Number	Date Trouble Open with BellSouth	Date Closed	Resolution Details
		549119	227781	01/12/2001	01/29/2001	Port completed
		632153	403489	02/12/2001	02/14/2001	Updated translations
		775343	436729	03/29/2001	03/30/2001	Update AIN database
		856051	469426	04/24/2001	04/24/2001	Intercept message removed
		856274	1016797	04/27/2001	05/02/2001	BellSouth Maintenance
		868909	29660 43734	04/27/2001	04/30/2001	Intercept message removed and port completed
		874730	86669	04/30/2001	05/01/2001	Intercept message removed and port completed
		887194	154032	05/03/2001	05/04/2001	Intercept message removed
		884949	148390	05/03/2001	05/03/2001	Intercept message removed
		916767	344837	05/11/2001	05/14/2001	Intercept message removed and port completed
		932716	8573	05/21/2001	05/22/2001	Intercept message removed and port completed

Exhibit JBC-5  
Letter dated June 5,2001, from Jan Burriss to Denise C. Berger



BellSouth Interconnection Services  
Suite 200  
1960 West Exchange Place  
Tucker, Georgia 30084

770 492-7590  
Fax 770 492-0937  
Internet:  
Jan.Burriss1@bridge.bellsouth.com

Jan M. Burriss  
Sales Assistant Vice President  
AT&T Regional account Team

June 5, 2001

Ms. Denise Berger  
AT&T  
1200 Peachtree Street  
12<sup>th</sup> Floor  
Atlanta, Georgia 30038

Dear Denise:

This is in response to your letter dated May 25, 2001, regarding BellSouth's provisioning of AT&T Insight Customer orders in Kentucky.

The account team is researching the issues raised in your letter concerning the provisioning of port services in Kentucky. BellSouth will not agree that there are gaps in BellSouth's porting process for residential numbers. In order to fully investigate the allegations and provide detailed results, BellSouth will need additional time and, therefore, is unable to meet the requested commitment date of June 4, 2001. BellSouth will respond to your request for an investigation of these issues as soon as possible.

Please feel free to call me at 770-492-7590, if there are additional questions.

Sincerely,

Jan Burriss  
BellSouth Interconnection Services

cc. Jan Flint  
Jan Burriss

Complaint of AT&T Against BST  
Exhibit K