BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of	)	
	)	
Joint Application by BellSouth Corporation,	)	
BellSouth Telecommunications, Inc.,	)	CC Docket No. 02-35
and BellSouth Long Distance, Inc. for	)	
Provision of In-Region, InterLATA	)	
Services in Georgia and Louisiana	)	

SUPPLEMENTAL REPLY AFFIDAVIT OF KEN AINSWORTH

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I, Ken L. Ainsworth, being of lawful age and duly sworn upon our oaths, hereby depose and state**:**

I. INTRODUCTION

1. My name is Ken L. Ainsworth. I am employed by BellSouth Telecommunications, Inc., as Director-Interconnection Operations. As part of BellSouth's filing in CC Docket No. 01-277, I filed an Affidavit with the Federal Communications Commission (the "Commission") on October 2, 2001 and a Reply Affidavit on November 13, 2001. (*See* App. A, Tab A, and Reply App., Tab A, respectively.) I also filed a Joint Reply Affidavit on November 13, 2001 and a Joint Supplemental Affidavit on February 14, 2002. (*See* Reply App., Tab P, and Supp. App. A, Tab C, respectively.)

II. PURPOSE OF SUPPLEMENTAL REPLY AFFIDAVIT

2. The purpose of this affidavit is to address the issues regarding manual ordering processes, provisioning processes and maintenance and repair processes raised by AT&T, WorldCom, COVAD, KMC Telecom, Mpower, Network Telephone, Birch Telecom, Xspedius, US LEC and XO Georgia.

III. SERVICE ORDER ACCURACY

3. BellSouth takes service order accuracy ("SOA") seriously and has undertaken several initiatives over the past several months to improve SOA for all CLECs. These initiatives, which were described more fully in the Joint Supplemental Affidavit, include quality initiatives that have greatly increased the scrutiny of review of service orders created by the service representatives in the Local Carrier Service Centers ("LCSCs"), as well as the amount of feedback provided to the service representatives in areas identified for improvement. BellSouth has engaged with several individual CLECs, including Birch, Florida Digital, and Network Telephone, to focus on making the preordering and ordering processes more efficient and less costly for both the CLECs and BellSouth.

4. BellSouth's performance measurement results, which demonstrate that BellSouth is performing at a high level, reflect BellSouth's efforts. Mr. Varner's Supplemental Reply Affidavit (Supp. Reply App., Tab I) discusses BellSouth's service order accuracy performance in detail.

5. Moreover, contrary to some CLECs' allegations, BellSouth is committed to sustaining its SOA performance. The number of service orders being reviewed by the LCSC has increased over the past several months and the SOA results continue to improve. The fact that BellSouth has voluntarily incorporated its SOA measure in its Self Effectuating Enforcement Mechanisms ("SEEMS") penalty plans in both Georgia and Louisiana is further evidence of BellSouth's commitment to sustain SOA performance. This is not the position BellSouth would initiate without complete commitment to sustain SOA performance. Several CLECs have made comments before this Commission related to SOA, to which BellSouth will reply in the following paragraphs. However, when one looks at the substance of these complaints, it is obvious from analysis that these CLECs

are focused on a very small percentage of SOA issues when compared to the number of orders processed. Many of the CLECs' accusations are wholly unsupported by any data. Such unsupported assertions are entitled to no weight. (*See Texas 271 Order* ¶*50.)*

6. Both the Georgia and Louisiana Public Service Commissions support BellSouth's position. In its Supplemental Comments, the Georgia Public Service Commission specifically noted BellSouth's quality initiatives, finding that "BellSouth's efforts to improve its performance in the area of service order accuracy have been successful."[1]

7. More importantly, however, BellSouth's efforts are reflected in the comments of the CLECs themselves, who confirmed, either by their own data or their comments, the improvements in the accuracy of service orders. Even WorldCom's data supports BellSouth's position that service order accuracy is improving. WorldCom sampled *** *** orders in Georgia with an error rate according to WorldCom data, of *** ***%. This certainly is above the benchmark of 95%. As another example, Birch agrees in its filing that SOA has improved (*Birch Supplemental Comments,* at 7 and 8).

8. As described in the Joint Supplemental Affidavit, and as mentioned above, one of the ways BellSouth has sought to improve its SOA performance is through cooperative efforts with individual CLECs. Over the past several months, for example, BellSouth has worked cooperatively with Birch, as well as with other CLECs, in a concerted effort to improve SOA. As part of this effort, BellSouth has increased its quality review efforts related to the creation of service orders by service representatives in the LCSCs. All CLECs' orders are now being more thoroughly reviewed than they were several months ago. This increased scrutiny on all CLEC orders, including Birch's orders, will continue as long as

[1] *Georgia Commission's Comments to BellSouth's Supplemental Filing* at 18 (March 4, 2002).

necessary to maintain BellSouth's performance at levels at or above the 95% benchmark set for this measurement.

9. Birch's orders have also been reviewed for quality assurance in order to ensure that the appropriate level of accuracy is maintained and in order to provide feedback on areas for improvement to the representatives working these orders. These efforts will result in improved performance for all CLECs, not only for Birch. To measure the effectiveness of these efforts, Birch and BellSouth conduct periodic reconciliations of the data with the goal of obtaining a performance assessment on which both parties agree.

10. One relatively minor difference of opinion in the reconciliation process is the point at which the parties determine the accuracy of the order. Part of BellSouth's quality review process includes a review of the actual service order produced by the service representative against the local service request that the CLEC submitted. This review is performed very soon after the creation of the service order and the delivery of the Firm Order Confirmation ("FOC") to the CLEC, and before the order is provisioned. This process, which is ongoing, identifies errors and corrects them prior to provisioning so that the service order is processed accurately. This process is beneficial to CLECs because it avoids the cost and difficulty associated with a wrongly provisioned order.

11. In conducting these reconciliations, it is appropriate to assess the accuracy of the order after the order has undergone the quality review process. From a service order quality perspective, the primary goal is to measure whether the service order as provisioned is accurate and the end user receives the services as ordered by the CLEC on its local service request ("LSR"). Moreover, because the SOA sample for the Service Quality Measurement ("SQM") is drawn after the services are provisioned and after the quality

review is performed, BellSouth's calculation is consistent with the methodology used in the calculation of the reported SOA results.

12. Birch, on the other hand, reported results and conclusions for the reconciliations based on the accuracy of the initial service order, and did not reflect the fact that the service order was still under quality review and, in limited instances, that errors were corrected very soon after order issuance. The SOA reconciliations with Birch have been very beneficial to both companies. The difference between Birch's reported error rate of *** ***% and BellSouth's reported error rate of 12% for the December 2001 reconciliation represents *** ***%. This is a difference of opinion as to how service orders should be categorized when the pre-provisioning process discussed above corrects errors. This disagreement affected *** *** out of the *** *** service orders that were a part of the reconciliation. (See Supplemental Reply Exhibit KLA-1.)

13. Regardless of the methodological differences between BellSouth and Birch, the results of the reconciliation process clearly show that BellSouth's SOA performance has improved. The last two (2) reconciliations conducted in February 2002, show that SOA performance exceeds 90%, using either Birch's or BellSouth's methodology.

14. Birch incorrectly compares its performance with BellSouth's performance by stating that Birch only had one error in the initial reconciliation. Because Birch does not issue service orders, the only performance comparison that can be made between Birch's performance and BellSouth's performance is a comparison between the accuracy of LSRs submitted by Birch and service orders issued by BellSouth. BellSouth received *** *** LSRs from Birch in January 2002. Birch's clarification rate for January 2002 was *** ***%. This means that *** ***% of the LSRs received from Birch had an error that resulted in a clarification by BellSouth. This indicates that Birch's accuracy rate

on LSRs is only *** ***%; as compared to BellSouth's service order accuracy rate of over 90%, as agreed to by both parties. These clarifications may or may not be due to manual processing, but are primarily Birch's errors nevertheless.

15. Birch fails to mention several other very successful improvement processes that are ongoing. One such activity is the operations meetings, which began in December 2001. These weekly operations meetings were initiated by BellSouth's Account Team to initiate service improvements between Birch and BellSouth. An example of process improvement resulting from these meetings is that BellSouth's Customer Wholesale Interconnection Network Services ("CWINS") operations center has engaged in up-front dual service validation trials with Birch to enable a more efficient processing of dual service requests. This improved process enables Birch to interact with its end user proactively for dual service requests. Dual service allows the end user, when moving to a new location, to have duplicate service provided at both locations.

16. The CWINS operation also expanded the scope of its maintenance processes to include resolution of preorder completion issues that may occur during the dual service process related to a customer move. This process reduced delays in resolving any dual service issues prior to a completed service transition. Finally, the BellSouth staff and its field network operations forces have worked together to improve the CLEC contact process used by BellSouth's installation and maintenance technicians when problems arise in completing dual service requests related to a customer move. These initiatives represent many hours of effort on BellSouth's part to support and improve the preordering and ordering processes for Birch. Other CLECs will receive the benefit of these improvements as well.

IV. UNE-P CONVERSIONS

17. Since the summer of 2001, BellSouth has reviewed every trouble ticket opened related to a UNE-P conversion in order to monitor and manage issues associated with the conversion process. In particular, BellSouth has maintained its focus on issues associated with the two-order process in order to ensure that there is no adverse competitive impact from this ordering process. Various CLECs continue to exaggerate the impact of the two-order process through their reliance on data that have no connection to the two-order conversion process. As BellSouth has repeatedly described, and as I will discuss in more detail below, BellSouth's data continues to show that conversion-related problems are isolated issues rather than a systemic problem. BellSouth has remained committed to maintaining focus on the conversion process pending implementation of the "Single C" ordering process. As Mr. Stacy describes in his Supplemental Reply Affidavit (Supp. Reply App., Tab G), BellSouth has now implemented the "Single C" ordering process.

18. Several CLECs have suggested that BellSouth's two-order process results in significant loss of dial tone during conversions. AT&T, WorldCom, and Network Telephone have stated that *** ***%, *** ***% and *** ***%, respectively, of their customers experience service outages or disruptions as a result of BellSouth errors and BellSouth's two-order process. These claims are inaccurate and unsupported by the evidence. In fact, the Georgia Public Service Commission agreed with BellSouth that service disruptions as a result of the "D" and "N" order process were isolated. This continues to be the case. *See Georgia Commission's Comments* at 135-136, *Georgia Commission's Comments to BellSouth's Supplemental Filing*, at 21 ("Nevertheless, the Commission stands by its conclusion that the occurrence of lost dial tone during UNE-P conversions is relatively isolated").

19. AT&T's Ms. Seigler claims that evidence provided by them in October 2001 indicated that up to *** ***% of their customers were experiencing service outages or disruptions as a result of BellSouth errors in the conversion process. My Reply Affidavit filed on November 13, 2001 demonstrates that this claim (which is now dated) was not even valid when made.

20. AT&T (Bradbury/Norris/Seigler) alleges that BellSouth makes errors on service features ordered for UNE-P. BellSouth's analysis of AT&T's UNE-P conversions for feature-related troubles indicate that for the period November 2001 through February 2002, only *** ***% of conversion orders experienced a feature-related trouble condition. (*See* Supplemental Reply Exhibit KLA-2.) This data demonstrates that over 99.6% of the time, BellSouth is provisioning conversion orders for AT&T without a feature-related problem.

21. AT&T provided three attachments to Ms. Seigler's Supplemental Declaration as examples of customers who experienced problems with UNE-P conversions. Ms. Seigler also provided seven (7) examples of customers who either experienced a loss of service or features during their conversions. Six (6) of these seven (7) examples were also included in the attachments to Ms. Seigler's Supplemental Declaration. It appears AT&T counted every service outage as a conversion-related problem, whether or not it actually was the result of the conversion. BellSouth has analyzed each of the examples provided by Ms. Seigler and the results of that analysis are provided in the following paragraphs.

22. Ms. Seigler stated in her Supplemental Declaration that her Attachment 1 includes troubles experienced by AT&T's customers between July 1 and November 1, 2001. Her Supplemental Declaration also states that these troubles were reported within 72 hours of service being converted. BellSouth's analysis indicates that for the 81 Purchase Order Numbers ("PONs") provided, only 29 actually had troubles related to the conversions.

Thirty-eight (38) of the PONS had troubles that could not be related to conversion activity. In other words, the maintenance trouble tickets on those 38 PONS were not related to any conversion activities. Fourteen (14) of the PONs could not be found. Only 31 of the 67 PONs that were found were actually reported to BellSouth within 72 hours of the conversions.

23. Ms. Seigler's Attachment 2 includes 43 customers who experienced troubles between November 2001 and January 2002. BellSouth's analysis indicates that only 24 of these troubles were related to the conversions. Twelve troubles were not related to the conversions and seven (7) of the PONs could not be found.

24. Attachment 3 of Ms. Seigler's Supplemental Declaration allegedly includes 12 customers who experienced troubles between February 1 and February 19, 2002. BellSouth's analysis indicates that only five (5) of these troubles were related to conversions. Four (4) troubles were not related to the conversions and three (3) of the PONs could not be found.

25. As is evidenced by the analysis described above, Ms. Seigler is obviously misrepresenting normal maintenance problems as conversion problems in an attempt to cast doubt on BellSouth's performance when converting UNE-Ps.

26. Ms. Seigler also claims "AT&T customers have continued to experience problems in resolving outages due to problems with BellSouth's maintenance and repair operations." She continues that BellSouth personnel have closed out trouble tickets without notifying AT&T and that BellSouth technicians make visits to customer locations after business hours and then either code the ticket "no access" or close out the trouble ticket. She is incorrect. AT&T has not provided any data to support such a claim. This claim is entitled to no weight. (*See Texas 271 Order, ¶50)*. Moreover, BellSouth's methods and procedures contradict this allegation. BellSouth's technicians are instructed to contact the

CLEC when closing out a trouble ticket. They are also instructed that a trouble ticket should not be coded "no access" if a repair visit is made outside of the access hours that are provided by the CLEC. Also, if a trouble is coded to "no access," it is returned to the dispatch pool for another dispatch and does not require AT&T to open another trouble ticket, as erroneously stated by Ms. Seigler.

27. BellSouth's data indicates that the Customer Trouble Report rate for AT&T UNE-P customers for the period November 2001 through February 2002 is *** ***% while for BellSouth's retail operations, the Customer Trouble Report rate is 2.5%. (*See* Supplemental Reply Exhibit KLA-3.) For the same time period, the Repeat Report Rate for AT&T UNE-P customers is *** ***% while for BellSouth's retail operations, the Repeat Report Rate is 17%. (*See* Supplemental Reply Exhibit KLA-4.) If the problems alleged by Ms. Seigler were real, one would expect to see that situation reflected in the data for these measures. Such is not the case.

28. Network Telephone claims that between February 2001 and May 2001, it requested that BellSouth convert over *** *** customers from resale to UNE-P. Network Telephone further claims that BellSouth caused *** ***% of its business customers to lose service during conversion and that the average outage exceeded *** *** hours. Again, Network Telephone has offered no data in support of its allegation and it is, thus, entitled to no weight. A more realistic view of BellSouth's performance for UNE-P conversions can be gained by utilizing data more current than February 2001 through May 2001. In the following paragraphs, BellSouth will use current data to demonstrate its performance.

29. WorldCom alleges that manual processing of LSRs results in delays and errors. WorldCom alleges instances of loss of dial tone due to errors related to the RRSO Field

Identifiers ("FIDs") by BellSouth's service representatives, unclear error messages, invalid clarifications, and service order errors.

30. In the face of consistent data to the contrary, WorldCom continues to allege problems with loss of dial tone on UNE-P conversions. BellSouth's analysis of WorldCom UNE-P conversion related troubles indicates that from November 2001 through February 2002, only *** ***% of WorldCom's customers lost dial tone as a result of the conversions (*See* Supplemental Reply Exhibit KLA-5.)

31. WorldCom alleges that service order errors by the LCSC service representatives result in incomplete and inaccurate features being provisioned. WorldCom did not provide any recent examples of this issue and, thus, demonstrates nothing about BellSouth's current performance. BellSouth continues to believe that the processes and initiatives that have been implemented to address these issues are working well. WorldCom previously provided 14 examples of alleged inaccurate feature provisioning caused by LCSC service representatives. In the attached exhibit, BellSouth's analysis indicates that 13 of the 14 examples cited from January 2002 did have LCSC errors. Thirteen (13) out *** *** orders issued in January 2002 is a very small number and does not reflect a significant problem. (*See* Supplemental Reply Exhibit KLA-6.)

32. BellSouth's analysis of WorldCom's allegations regarding its UNE-P conversions encountering feature-related trouble conditions indicates, for the period November 2001 through February 2002, that only *** ***% of the conversions experienced a feature-related trouble condition. (S*ee* Supplemental Reply Exhibit KLA-7.) Therefore, over 99.9% of the time, BellSouth provisioned the WorldCom conversion orders without a feature-related problem.

33. WorldCom claims that from the time that it launched its local service offering in Georgia in May 2001 to January 25, 2002, *** ***% of its customers have lost dial tone within 30 days of migrating to WorldCom. For the period from November 2001 to February 2002, provisioning troubles within 30 days of installation for WorldCom is *** ***% as compared to 3.6% of BellSouth's retail customers encountering provisioning troubles within 30 days of installation. (S*ee* Supplemental Reply Exhibit KLA-8.) Therefore, WorldCom's provisioning trouble report rate within 30 days of installation is *** ***% less than that of BellSouth retail customers. For this same time period, WorldCom's total Customer Trouble Report rate is *** ***% while for BellSouth's retail customers the Customer Trouble Report rate is 2.5%. (*See* Supplemental Reply Exhibit KLA-9.)

34. Although BellSouth has now implemented the "Single C" order process for UNE-P conversions, BellSouth's use of the two-order process (that is, the use of a "D" and "N" order process) for such conversions is a sound process. BellSouth has analyzed all UNE-P conversion related troubles reports received from CLECs since June 22, 2001. In its analysis, BellSouth reviewed all trouble reports received for the period from three (3) business days prior to a conversion to five (5) business days following a conversion. For the period November 2001 through February 2002, BellSouth processed 238,678 UNE-P orders in its nine-state region. Of these orders, only 0.47% had conversion-related problems. Said another way, BellSouth processed over 99.5% of the UNE-P orders requests without a conversion-related incident. Tracked incidents include not only loss of dial tone problems but also any type of problems such as feature or hunting problems. As shown in Supplemental Reply Exhibit KLA-10, only 0.29% of the conversions actually resulted in a loss of dial tone.

35. Indeed, even WorldCom's own evidence, namely the KPMG report to which WorldCom refers, demonstrates the minimal impact of this issue when it is factually portrayed. The report, even by WorldCom's own admission, concluded that "fewer than *** ***% of WorldCom's orders lost dial tone in the time period."[2]

36. BellSouth strives to minimize customer outages and service disruption during and/or after migration from BellSouth's service to a CLEC's service. To that end, BellSouth has performed extensive analysis of its conversion process. BellSouth's analyses have shown that when actual conversion-related troubles are analyzed, there is no significant conversion-related problem that results in loss of dial tone for UNE-P customers. WorldCom's and AT&T's own data support BellSouth's conclusion.

37. Finally, BellSouth has now implemented a "Single C" order process for UNE-P conversions. Prior to the implementation of the "Single C" process, BellSouth implemented a measure that reports the percentage of premature disconnects of UNE-P conversions associated with the two-order process in Georgia and Louisiana. The measure reflects the number of premature UNE-P disconnects which occur between the due date and three (3) days prior to the due date. The benchmark is no more than 1% premature disconnects, and BellSouth pays Tier I and Tier II penalties on this measure.

V. MANUAL PROCESSING

38. BellSouth monitors and manages the accuracy of manual clarifications returned to CLECs. This is accomplished by constantly reviewing CLECs' calls made to the LCSC for the purpose of correcting invalid clarifications. These data continue to show that the number of invalid clarifications is very small. WorldCom challenges a small percentage

[2] *See WorldCom ex parte,* December 14, 2001 at 6.

of the clarifications it receives, but only a fraction of the clarifications challenged by WorldCom actually prove to be incorrect clarifications. In January 2002, for example, WorldCom received *** *** clarifications. WorldCom call data for January 7 through February 1, 2002 indicates that WorldCom called the LCSC to challenge the validity of *** *** of those clarifications, or *** ***%.

39. Of the *** *** clarifications that WorldCom challenged, only *** *** of those were clarified by the LCSC in error. Thus, including all January 2002 clarifications and the period reflected by the call data, approximately *** ***% of the total clarifications were identified as being invalid. In other words, approximately *** ***% of BellSouth's clarifications are correct. This certainly does not substantiate WorldCom's accusation that BellSouth is the major contributor for clarification errors.

40. With respect to the *** *** calls questioning the validity of clarifications, a number of these calls involved the CLEC's asking for an explanation of the clarification and assistance in resolving it.

41. In an effort to further assist WorldCom in improving its ordering process, the LCSC service order review team is verifying every manual clarification for accuracy before the clarification is sent to WorldCom. This is a joint endeavor with WorldCom, in that WorldCom is also reviewing the clarifications on a daily basis. The LCSC participated in a weekly conference call to discuss this joint endeavor with WorldCom. According to WorldCom, this partnership with the LCSC has further decreased the number of invalid clarifications, and WorldCom agreed to close out the manual clarifications issue on March 14, 2002.

42. As an additional enhancement, the BellSouth Flow Through Task Force is currently working on a process to standardize manual clarifications. The result will be a standard set of clarification reasons that will be used by all representatives when clarifications are sent to CLECs. This enhancement will ensure that the wording on the clarification will always be the same for a given clarification reason, and will assist the CLEC in understanding the clarification and in utilizing the ordering guides properly such that the information needed to update and correct the error is provided to BellSouth. This will also reduce the need for a clarification call and save the CLEC time in responding to the clarification. The BellSouth Flow Through Task Force is currently sharing these standardized clarification reasons with various CLECs to finalize the clarification reason list.

43. BellSouth also performed a special study with Birch on invalid clarifications and service order accuracy. BellSouth's analysis of calls made to the LCSC reveals that Birch had *** *** LSRs in January 2002 clarified in error out of a total of *** *** total clarifications. This equates to a *** ***% error rate or a 90% accuracy rate.

44. Network Telephone also alleges that it receives a high number of invalid clarifications. Network Telephone provides no examples of these invalid clarifications in support of its claims and accordingly should be given no weight. However, Network Telephone had previously provided the Florida Commission's CLEC Collaborative Workshop with *** *** examples of alleged invalid clarifications from December 2001 through early February 2002. The majority of these clarifications were valid in that they were related to an Asymmetrical Digital Subscriber Line ("ADSL") Universal Service Order Code ("USOC") on the end-user's Customer Service Record ("CSR").

45. Additionally, BellSouth performed an analysis by sampling *** *** orders out of the *** *** orders provided by Network Telephone. Of these *** *** sampled orders, only *** *** were manual clarification errors which would suggest a total of *** *** clarification errors for the entire *** *** orders challenged by Network Telephone. Based on approximately *** *** clarifications returned to Network Telephone during this period, these *** *** clarification errors would result in a 97% valid clarification rate by BellSouth. (*See* Supplemental Reply Exhibit KLA-11.)

46. Xspedius alleges that the LCSC sends multiple clarifications for different reasons on the same LSR instead of clarifying everything on the initial clarification. Xspedius did not provide any data to substantiate its claim and its claim should, thus, be given no weight. While it is the LCSC's policy to screen the LSR completely and to clarify for all errors on the initial clarification, it sometimes is not possible to do so. For example, if a telephone number or address for the end user is incorrect on the LSR, the BellSouth service representative cannot provide a complete validation that the service requested is available in a central office if he or she cannot verify the serving wire center where an address or telephone number would be required.

47. KMC alleges that BellSouth sends incomplete manual FOCs that do not provide the BellSouth order number. KMC did not provide any data to substantiate this claim and, therefore, BellSouth cannot do an analysis to either confirm or deny this allegation. BellSouth's procedures do, however, call for including the BellSouth order number with the FOC.

48. KMC alleges that BellSouth improperly clarifies LSRs for "invalid circuit ID." KMC maintains that this clarification is received even though KMC utilizes the Computer

System for Mainframe Operations ("COSMOS") report to check the circuit ID prior to submitting the LSR. KMC provided no examples in its reply affidavit. The COSMOS report provides working circuit IDs, circuit IDs that are pending to be disconnected and circuit IDs that are pending connection on an order. This report does not have the ability to provide circuit IDs for new service requests not yet processed. A circuit ID is required on other types of requests such as change requests and disconnects. KMC should be able to use the COSMOS report to obtain valid circuit IDs to process these types of service order requests. However, the circuit ID must be formatted properly on the LSR or a clarification will occur. KMC had previously given *** *** examples to BellSouth's Customer Support Manager assigned to the KMC account. These examples were given on a conference call to discuss KMC issues. Upon an analysis of the PONs provided by KMC, it was determined that *** *** of the PONs was clarified for a reason other than an invalid circuit ID. *** *** PON was not found. The remaining *** *** PONS were clarified correctly by BellSouth for KMC errors not related to any error in the COSMOS report. This analysis does not indicate a circuit ID clarification problem related to the COSMOS report as asserted by KMC. (*See* Supplemental Reply Exhibit KLA-12.)

49. COVAD complains about manual processing problems it contends it experienced with the LCSC regarding Unbundled Copper Loops-Non Designed ("UCL-ND"). COVAD states that UCL-ND test requests were not processed correctly, and that the problems have not yet been resolved. While COVAD complains that BellSouth "never accepted responsibility for omitting the test USOC code from these orders," BellSouth's Customer Support Manager and Product Manager, in fact, performed a root cause analysis on a group of test orders and provided feedback to COVAD. This analysis (refer to Joint Supplemental Affidavit Exhibit SVA-54) indicated that, while the LCSC was provisioning the order correctly, it had failed to provide a manual test USOC on some service orders.

This failure would result in a field technician not recognizing the requirement that manual testing be performed at turn-up. The LCSC service representative did not recognize that the USOC must be placed in the remarks section of the LSR by the CLEC. There were instances where some of the service representatives were not validating this field for the test USOC. Once this problem was identified, the LCSC service representatives were retrained on the proper process. It is BellSouth's belief that this issue has been resolved. Indeed, in the latest meeting with COVAD on February 19, 2002, this issue was not addressed by COVAD as a pending issue.

VI. ORDERING

50. Birch's Supplemental Comments assert that the 2002 Birch Flow-Through Action Plan presented by BellSouth was premature and misleading. The draft plan presented to Birch was a "working" document with the purpose of gaining input from Birch to develop a final action plan. Birch was well aware that this was not the final plan; nonetheless, Birch chose to include such in its filing of negative comments related to the draft Plan. The proposed 2002 Action Plan was presented to Birch on March 13, 2002. With minor modifications, the plan is expected to be agreed to by both BellSouth and Birch in the very near future. This action plan incorporates targeted improvements by both Birch and BellSouth with tracking dates and follow-up measures to ensure flow through improvement results along with monthly analysis and periodic monthly interim feedback. This was exactly what Birch stated it would like to see incorporated in a flow through plan, and this is what BellSouth provided.

51. BellSouth has worked with Network Telephone representatives on a variety of issues. Several calls have been held with Network Telephone personnel to discuss various operational issues. In addition, one formal conference call was held to discuss

provisioning and maintenance issues raised by Network Telephone.[3] One of the issues raised by Network Telephone in this process related to Network Telephone's ability to electronically submit some types of T-1 UNE orders. In Network Telephone's comments (filed in the present docket), it mischaracterizes this issue by saying that it can no longer electronically order T-1 UNEs. The T-1s to which Network Telephone is likely referring are a limited subset, which are ordered with inside wiring. BellSouth issued a carrier notification letter, SN91082914 (*see* Supplemental Reply Exhibit KLA-13), specifically to address inside wiring associated with T-1 circuits. The notification letter stated that these requests must be ordered manually because, while the stand-alone T-1 circuit can be ordered electronically, the inside wire order must be placed manually, and thus when ordered together they must be ordered manually. This ordering process is not a "change," and it does not impact electronic ordering capability of stand-alone T-1 UNE circuits when inside wiring is not required.

52. Excluding extended demarcations and inside wiring requests, CLECs also can order T-1 UNEs electronically to include special Network Interface Device ("NID") jack requests. This information was explained to Network Telephone and a process was implemented to resolve the NID jack request issue. On a subsequent conversation with Network Telephone on March 15, 2002, Network Telephone confirmed that this issue has been resolved. Network Telephone also indicated, in the Florida Commission's CLEC Collaborative Workshop on March 21, 2002, that this issue had indeed been resolved.

53. COVAD alleges that BellSouth has no communications channels between BellSouth's LCSC, Customer Support Managers, and Electronic Communications Support group. To the contrary, BellSouth believes its process is clear as to whom the CLEC should call for

[3] An operational meeting scheduled for March 20, 2002 was rescheduled to April 15, 2002 by Network Telephone.

which issues. If the issue is related to a manual order or clarification, the CLEC should contact the LCSC. The Electronic Communications Support group should be contacted regarding electronic ordering system issues. If the issue is not resolved or the CLEC simply does not know whom to call, the Customer Support Manager can assist the CLEC.

VII. PROVISIONING

54. Mpower claims that while BellSouth has "finally" instituted a Frame Due Time ("FDT") process, it is unsatisfactory because BellSouth will only specify a business day on which the transfer will occur. Additionally, Mpower contends that BellSouth should not charge separately for hot cut coordination. Contrary to Mpower's assertion, BellSouth has not recently implemented an "FDT process." BellSouth implemented such a process quite some time ago. BellSouth has provided coordinated conversions both time specific and non-time specific since early 1997. BellSouth's SL-2 loop includes coordination in the cost of the service. If the CLEC wishes for these conversions to occur at a specific time, the CLEC may request a time when it submits its LSR to BellSouth. There is an additional charge for a time specific conversion due to the increased cost associated with the additional coordination that is involved. BellSouth's time specific conversions can start within 15 minutes before or after the specified time. BellSouth measures its success in the area of coordinated conversions, and the results as reflected in the performance data are excellent.

55. BellSouth also has reviewed the CLEC-specific data for Mpower related to the timeliness of coordinated conversions. The attached data indicates that for the period July 2001 through February 2002, *** ***% of the coordinated conversions scheduled for Mpower were started on time. For the same time period, BellSouth completed the conversion in less than 15 minutes per circuit, *** ***% of the time. (S*ee*

Supplemental Reply Exhibit KLA-14.) BellSouth's performance is extraordinarily good in this area. It appears that Mpower wants to have a time specific conversion at no charge. Of course, because BellSouth incurs additional cost when it coordinates a conversion and because BellSouth is entitled to recover the cost of providing services to CLECs, BellSouth cannot support Mpower's wish.

56. COVAD claims that it continues to experience severe difficulties with getting its UCL-ND orders provisioned correctly. It further states that it is not receiving calls from BellSouth's technicians to turn-up these circuits. Upon investigation of COVAD's issue, BellSouth did discover a flaw in the turn-up process used by BellSouth's outside technicians. This process has been corrected with the assistance of the Network Improvement Team.

57. BellSouth has met with COVAD recently in an attempt to better understand COVAD's issues and to enhance communication between the two companies. BellSouth's perception is that these have been positive, productive meetings, and BellSouth hopes that COVAD also perceives these meetings as productive. BellSouth has already undertaken several service improvement initiatives as a result of these meetings.

58. If BellSouth understands XO's and US LEC's allegation, these CLECs are complaining about delays in number porting requests associated with access services rather than with local services. BellSouth treats an access service request and a Local Number Portability ("LNP") service request as individual non-related requests. BellSouth's Interexchange Carrier Service Center ("ICSC") is responsible for the order issuance of access service requests. LNP orders are processed by the LCSC Operations Group. It is the responsibility of the CLEC to monitor its LNP requests and to make due date changes as

applicable to meet service needs. There is no correlation between the access request and the local porting order that will allow BellSouth to coordinate such orders**.**

VIII. MAINTENANCE AND REPAIR

59. Mpower claims that trouble tickets are being closed as no trouble found ("NTF") despite the existence of a problem with the facility, and that Mpower customers who have had NTF tickets have stated that a BellSouth technician did appear at their premises and did conduct repair work. Mpower has provided no data to substantiate these allegations and its claim should accordingly be given no weight. If a trouble is closed to NTF, there has been a technician dispatched on that trouble. Mpower's end users may have observed a BellSouth technician at the premises performing a test on the line. However, if the BellSouth technician detects no trouble while performing those tests, the trouble report will be closed to NTF.

60. Xspedius claims that BellSouth has failed to implement proper procedures and safeguards to ensure that customer-affecting outages are prevented. It further claims that when outages occur, BellSouth has not implemented proper procedures that enable BellSouth to discover the outages and take appropriate corrective action prior to Xspedius' customers losing service. Although unfortunate and unintended, it is a fact that users of telephone service will at times experience a disruption of service. This happens to BellSouth retail customers as well as to CLEC customers. BellSouth has the processes and trained personnel in place to ensure that troubles are cleared as expeditiously as possible. Xspedius has provided no data to support its claim and offers nothing more than a general allegation. As described in the Supplemental Reply Affidavit of Alphonso Varner, BellSouth's performance has demonstrated that the service being provided to CLECs is at parity with the service being provided to BellSouth's retail customers.

61. KMC claims that *** ***% of the analog loops turned up in January 2002 in Georgia failed within 30 days of installation. What KMC does not mention is that the *** ***% represents only *** *** circuit. KMC further claims that chronic outages are also a concern. KMC claims that over *** *** of the KMC DS-1 and higher loop troubles in both Georgia and Louisiana over the past eight (8) months had previous troubles reported within the prior 30 day period. BellSouth has repeatedly asked KMC to utilize the Chronics Group in BellSouth's CWINS Center to help resolve troubles that KMC perceives as being chronic. In an effort to encourage KMC to use this group, on February 9 2002**,** Commissioner Irma Dixon of the Louisiana Commission requested that representatives from KMC schedule a visit to BellSouth's Chronics Group. To date, KMC has not contacted BellSouth to schedule this visit. If KMC would utilize the Chronics Group, BellSouth believes that KMC's chronic troubles would be greatly reduced.

62. Xspedius also claims that BellSouth refuses to allow a 3-way telephone conference between BellSouth, the CLEC and the end user to assist in resolving outages more quickly. If an end user experiences an outage during and/or after a migration from BellSouth service to a CLEC, the CLEC has the responsibility to contact BellSouth's CWINS Center Maintenance Group to report the trouble. The CWINS Center will accept the trouble report and open a ticket to resolve the trouble. When situations require BellSouth to contact an end user to resolve issues, BellSouth will make that request to Xspedius to include the end user. It should not normally be necessary to require the end users' time in resolving outages if CLECs accurately take end user reports and perform the proper analysis before placing a trouble report with BellSouth.

63. Xspedius complains about BellSouth's alleged poor performance and lack of responsiveness to customer service outages. The only example that is referenced by Xspedius is one Synchronous Optical Network ("SONET") ring failure. In investigating this example, BellSouth determined that this was not a local circuit at all, but rather was an access circuit. Further, the circuit referenced is not a circuit that BellSouth provides to Xspedius. Rather, the circuit is one that BellSouth provides to CoStreet Communications. Mr. Lejeune of Xspedius also makes claims of problems with repeat troubles with T-1 circuits that Xspedius purchases from BellSouth. Mr. Lejeune does not provide any data to support this claim. BellSouth's data indicates that for the period November 2001 through February 2002, the Repeat Report Rate for Xspedius is *** ***% while the Repeat Report Rate for BellSouth's retail customers is 28.3% for the same time period (*See* Supplemental Reply Exhibit KLA-15.)

IX. CONCLUSION

64. This concludes my affidavit.