

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 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 WILLIAM N. STACY**  
Filed March 28, 2002

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I, William N. Stacy, being of lawful age and duly sworn upon my oath, hereby depose and state:

**I. INTRODUCTION**

1. My name is William N. Stacy. I am employed by BellSouth Telecommunications, Inc. (“BellSouth”) as the Network Vice President-Interconnection Services.
2. As part of BellSouth’s filing in CC Docket No. 01-277, I filed an Affidavit with the Federal Communications Commission (the “FCC” or the “Commission”) on October 2, 2001 and a separate Reply Affidavit on November 13, 2001. *See* App. A, Tab T, and Reply App., Tab O, respectively. I also filed a Joint Affidavit on November 13, 2001 with Alphonso Varner and Ken Ainsworth. *See* Reply App., Tab P. As part of this docket, CC Docket No. 02-35, I filed a Joint Supplemental Affidavit with Mr. Varner and Mr. Ainsworth on February 14, 2002. *See* Supp. App. A, Tab C.
3. My supplemental reply affidavit should be read in conjunction with other supplemental reply affidavits supporting BellSouth’s 271 application. BellSouth is filing several affidavits that address the interfaces and BellSouth's OSS, including those of Ken Ainsworth (Supp. Reply App., Tab A), David Scollard (Supp. Reply App., Tab F), Alphonso Varner (Supp. Reply App., Tab I), and Eric Fogle (Supp. Reply App., Tab C).
4. Exhibit WNS-1 is a list of all reply exhibits attached to this affidavit. A list of the acronyms used in this affidavit is attached as Exhibit WNS-2.

**II. PURPOSE OF THE AFFIDAVIT**

5. The purpose of this affidavit is to respond to the comments and affidavits submitted by other parties regarding OSS. Specifically, I respond to issues raised in the comments filed by AT&T Corp., WorldCom Inc., Sprint Communications Company LP, Covad Communications Company, Mpower Communications Corp., KMC Telecom Inc., and Birch Telecom of the South Inc.

6. Notwithstanding CLEC claims to the contrary, BellSouth is providing nondiscriminatory access to its OSS and BellSouth's systems are operationally ready to handle, and are in fact handling, commercial volumes of pre-ordering, ordering and provisioning, maintenance and repair, and billing transactions. As set forth in my initial affidavit of October 2, 2001, my reply affidavit of November 13, 2001, the Joint Affidavit of February 14, 2002, and this reply affidavit, BellSouth has built a detailed record documenting the nature and extent of BellSouth's OSS offerings and establishing that BellSouth's OSS satisfy the requirements of Section 271 of the Telecommunications Act and FCC precedents.
7. CLECs have failed to present any credible evidence to counter the record demonstrating that BellSouth provides nondiscriminatory access or, where there is no retail analog, a meaningful opportunity to compete. The issues presented by the CLECs, and addressed below, for the most part raise issues that have been previously considered and rejected by the Georgia and Louisiana Public Service Commissions ("PSCs"). While BellSouth's systems can always be improved, BellSouth has in fact implemented and is implementing many of the improvements directed by the Georgia and Louisiana Commission, which numerous CLECs had requested (as described in detail in all my affidavits filed since October 2, 2001).
8. Since this Commission issued its *Second Louisiana Order* on October 13, 1998, BellSouth's OSS and the interfaces used by the CLECs have been thoroughly examined and scrutinized. For two years, BellSouth's OSS and the access it provides were subject to a comprehensive third-party test in Georgia (although the third-party metrics test in Georgia continues). In addition, there have been workshops and collaborative processes on BellSouth's OSS and the interfaces in several BellSouth states, and these systems and interfaces also have been subject to additional scrutiny in connection with numerous state

271 proceedings in BellSouth's region. This comprehensive examination and scrutiny in addition to the extensive commercial usage of BellSouth's systems and interfaces conclusively establishes that BellSouth's OSS satisfy the requirements of Section 271 and FCC precedents.

9. This is precisely the conclusion reached by the Georgia PSC in its Supplemental Comments filed on March 4, 2002. On pages 3-4 of its Supplemental Comments, the Georgia PSC concluded that BellSouth has satisfied the requirements of Section 271 and FCC precedents, stating:

BellSouth has shown that: (1) it has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and is adequately assisting CLECs to understand how to implement and use all of the OSS functions available to them; and (2) the OSS functions BellSouth has deployed are "operationally ready," as a practical matter.

10. The Georgia PSC noted, on page 4 of its Supplemental Comments, that "BellSouth's showing that it is providing nondiscriminatory access to its OSS is underscored by the actual commercial usage of these systems which the FCC has repeatedly stated in its prior 271 orders is the most probative evidence of nondiscriminatory access." The Georgia PSC discussed the growth of UNE-P in service, and concluded "[s]uch growth could not have occurred unless BellSouth were providing sufficient access to each of the necessary OSS functions and unless such functions were 'operationally ready,' as a practical matter." Georgia PSC Supplemental Comments at 4.

### **III. CHANGE MANAGEMENT**

11. Although several CLECs express concern about Change Management, BellSouth's Change Control Process ("CCP") clearly satisfies the test adopted by the Commission in

evaluating whether a BOC's change management plan affords an efficient competitor a meaningful opportunity to compete.<sup>1</sup>

12. First, information relating to BellSouth's CCP is clearly organized and readily accessible to CLECs. BellSouth's documented process is extremely comprehensive and covers a wide range of change management issues, and is accessible by CLECs via BellSouth's CCP website at [www.interconnection.bellsouth.com](http://www.interconnection.bellsouth.com).
13. Second, CLECs have had and continue to have substantial input in the design and operation of the CCP. The original Electronic Interface Change Control Process ("EICCP"), which was established in 1998 at the direction of the Georgia PSC, and subsequent versions of the CCP document up to and including the current Version 2.8 (March 15, 2002) were developed as a result of a collaborative process between CLECs and BellSouth.
14. Third, the CCP defines a procedure for the timely resolution of change management disputes. In particular, Section 8.0 of the CCP document contains a clear escalation process with specific timeframes for responding as well as comprehensive dispute resolution procedures that allow any change management dispute to be resolved through the involvement of the appropriate state commission.
15. Fourth, the CCP provides a stable test environment that mirrors production. In particular, Section 10.0 of the CCP document (Testing Environment) defines all of the types of testing available in the CLEC Application Verification Environment ("CAVE"), the associated test phases supported by BellSouth, and the procedures for CLECs to use the testing environment.

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<sup>1</sup> The test was first adopted in the Commission's order granting 271 relief to Bell Atlantic (now Verizon) in New York, and reiterated in subsequent orders granting 271 relief to Southwestern Bell Corporation and Verizon (most recently in Rhode Island).

16. Fifth, BellSouth provides to CLECs effective and appropriate documentation and support for the purpose of building an electronic gateway. BellSouth's interconnection website has the appropriate contacts, business rules, documentation, technical references and specifications to assist CLECs in establishing electronic interfaces to BellSouth's OSS.<sup>2</sup> That more than 300 CLECs have established at least one electronic interface to BellSouth's OSS and used these interfaces in 2001 to submit over 4.1 million electronic service requests (89% of all requests submitted) and more than 325,000 electronic trouble reports is confirmation of the effectiveness of the information and support provided by BellSouth.
17. Sixth, BellSouth has demonstrated a pattern of compliance with the CCP. As discussed in greater detail below, the CCP process is working well overall as change requests are being handled on a timely basis and have been and continue to be implemented by BellSouth. For example, just in the past three months, BellSouth has implemented more than 60 change requests, which included such enhancements as LMU make-up enhancements, Order Tracking, parsed CSRs and single "C" functionality requested by the CLECs.
18. As the Commission has recognized, the change management process is not intended to be static. Rather, according to the Commission, "a key component of an effective change management process is the existence of a forum in which both competing carriers and the BOC can work collaboratively to improve the method by which changes to the BOC's OSS are implemented." *Texas Order* ¶ 117. Such a forum exists for BellSouth, as the Georgia PSC is in the midst of a comprehensive review of the Change Management

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<sup>2</sup> BellSouth is developing a new web site for the CLEC ordering guides. The prototype of site will be available to CLECs in late March 2002. The site can be reached via the usual Interconnection URL: <http://www.interconnection.bellsouth.com>. The new site will be more user friendly (for example, it will provide links between guides and there will be a common look and feel for the documents. It will also provide the CLECs with enhanced search capability for the guides. BellSouth has informed CLECs of the status of this site via the CCP.

process, which will allow CLECs and BellSouth to work cooperatively in implementing additional enhancements to the CCP.

19. This comprehensive review of the CCP began with the workshops conducted by the Georgia PSC as part of its annual examination of BellSouth's performance measurements and enforcement plan in Docket 7892-U. During the industry workshops in Docket 7892-U, the CLECs requested, and the Georgia PSC agreed to, the establishment of a process by which changes to the CCP could be addressed. As described by the Georgia PSC on pages 26 and 27 of its Supplemental Comments, this process has two phases; the first phase involves consideration of additional performance measurements related to the CCP, while the second phase involves consideration of changes to the CCP itself.
20. The first phase of the Georgia PSC's review of the CCP is largely complete, as the industry and Georgia PSC Staff have agreed to implement three additional CCP measures, which, according to the Georgia PSC, will allow it "to ensure that BellSouth corrects software defects and handles change management requests in a prompt and efficient manner." Georgia PSC Supplemental Comments at 26.
21. The second phase of the Georgia PSC's review of the CCP – modifying the change management process itself – is currently underway. At the request of the Georgia PSC, a coalition of CLECs filed on January 30, 2002 a "redline" version of the then-current CCP Document (Version 2.7) outlining their proposed modifications to the CCP. On February 15, 2002, in response to the CLECs "red-line" version, BellSouth filed its "greenline" version. The "greenline" indicates whether BellSouth agrees with specified changes, or offers alternative process language for which BellSouth hopes a consensus may be reached in the event that BellSouth cannot agree to the CLECs' change as stated in the "redline" version. (A combined "redline/greenline" CCP Document Version 2.7 is provided as Exhibit WNS-3).



22. As reflected in Exhibit WNS-3 and as noted by the Georgia PSC on pages 26-27 of its March 4, 2002 Supplemental Comments, “BellSouth has indicated its support for a number of the modifications proposed by the CLEC Coalition and has made specific proposals to address CLEC concerns about the scope of the CCP, length of time it takes to implement certain change requests, and the adequacy of the prioritization process.” Because it appears that consensus can be reached on a number of the proposed modifications, the CCP will conduct an informal workshop on March 28, 2002, using the “redline/greenline” document as a starting point. Although BellSouth remains optimistic that a number of issues will be worked out through the CCP, any issues that remain open after the CCP workshop will have to be resolved by the Georgia PSC.
23. The Louisiana PSC likewise is examining the CCP. On February 8, 2002, the Louisiana PSC Staff conducted another informal workshop between BellSouth and interested CLECs, which included a discussion about BellSouth’s Change Management process. During the February 8 collaborative meeting, the parties discussed the fact that the Georgia PSC was presently considering changes to CCP, and it was agreed by all parties at the workshop, including the Louisiana Staff, that the Louisiana Staff would monitor the Georgia proceedings and that any party not satisfied with the results of the Georgia proceeding could petition the Louisiana PSC for further relief. After the February 8 collaborative workshop, BellSouth provided to the Louisiana PSC Staff the “redline/greenline” version of the CCP document that is being discussed in the Georgia proceeding to assist the Louisiana Staff’s monitoring efforts.
24. In the Joint Supplemental Declaration of Jay Bradbury and Sharon Norris (CC Docket No. 02-35, ¶¶ 144-169) and in the Declaration of Sherry Lichtenberg (CC Docket No. 02-35, ¶¶ 111-123), both AT&T and WorldCom devote considerable energy to outlining changes they believe should be made to the CCP. Their proposed changes are

intertwined with complaints about the current CCP, including an allegation that the scope of the current CCP is too narrow and that the existing timeframes for correcting software defects are too long. The Georgia PSC’s current review of the CCP – not this proceeding – is the appropriate forum in which such issues should be addressed. While the Change Management process can always be enhanced, the current CCP provides CLECs with a meaningful opportunity to compete.

**Information Concerning The CCP is Clearly Organized and Readily Accessible**

25. No CLEC seriously disputes “that information relating to the change management process is clearly organized and readily accessible to competing carriers.” *Verizon-RI Order*, App. D, ¶ 42. BellSouth’s CCP document is comprehensive in scope, outlining each aspect of the change management process in a clear and concise manner. The CCP document is posted to the BellSouth interconnection website so that it can be reviewed at any time by interested CLECs.
26. BellSouth also posts other information relating to the CCP on its interconnection website, which is readily accessible by CLECs. This information includes: (i) Release Notification and Schedule Change Request information, which includes the change request log, electronic copies of the change requests forms, change request status updates, and notifications of system outages; (ii) CCP Meeting Documents, which include meeting notifications and CCP meeting minutes, and the monthly CCP meeting calendar; and (iii) CCP Activity Log (which is also e-mailed to CCP members), which includes an updated daily activity report outlining the activity associated with each change request being worked through the CCP.
27. Although not currently available on its website, BellSouth recently has begun providing CLECs with additional information relating to the CCP. This information, which is readily available to CLECs, includes: (i) a complete schedule for release implementation;

(ii) a report on the status of each of the “top 15” change requests as prioritized by the CLECs; and (iii) preliminary unit measurement estimates with each change request that can be used by the CLECs during prioritization.

**CLECs Had Substantial Input in the Design and Continued Operation of the CCP**

28. There also can be no serious dispute that the current Change Management process is the by-product of substantial CLEC input, and the CLECs have an ongoing voice in the current direction and operation of the CCP. Numerous changes have been and continue to be made to the CCP at the request of CLECs and as a result of collaborative workshops held in several states to enhance the workings of the CCP.
29. In September 2000, AT&T issued change request CR0171, which proposed sweeping changes to the CCP. Although BellSouth believes that the CCP is the proper forum in which to address modifications to the Change Management process, AT&T apparently thought otherwise and asked a number of state commissions to arbitrate proposed changes to the CCP in the context of AT&T’s new interconnection agreement with BellSouth. The state public service commissions generally declined to do so, ruling that AT&T’s proposed changes should be referred to the CCP for resolution.
30. While AT&T was seeking to arbitrate changes to the CCP, BellSouth continued to work within the CCP to implement the vast majority of AT&T’s proposed process changes. Over the course of a year and a half, and using the CCP voting process on no fewer than five ballots for change request CR0171, BellSouth implemented 67 changes to the CCP document, and, on each occasion, the CCP document was updated to reflect the ballot results. Although the vast majority of AT&T’s proposed changes have been implemented, AT&T will not allow the CCP to close change request CR0171, which only fuels its allegations that BellSouth does not work CLEC change requests.

31. In concept, the CCP is designed to cover the majority of situations that may arise in meeting the OSS needs of competitors in the local market, but even the comprehensive nature of BellSouth's CCP cannot anticipate all possible scenarios that may occur. As a result, the CCP is constantly evolving. The current version of the CCP document contains a lengthy version change history, outlining the numerous modifications to the Change Management process over the years, many of which were made at the express request of various CLECs.
32. That the evolutionary history of the CCP has been, in large measure, CLEC-driven is illustrated by the current review of the CCP in which the Georgia PSC is engaged. As part of that review, the CLEC Coalition has proposed numerous modifications to the Change Management process. The CLEC Coalition's proposals are further evidence of the strong voice CLECs have had and continue to have in the operation of the CCP.
33. While the CCP continues to evolve, so does the CLECs' vision of what they say they want the Change Management process to look like. For example, in connection with the Georgia PSC review of the CCP, the CLEC Coalition proposed certain changes that they represented as "solutions" to "key problems" with the CCP. However, shortly after making that proposal in Georgia, WorldCom witness Sherry Lichtenberg made a presentation on behalf of various CLECs at a workshop in Florida during which she stated unequivocally that "the CLECs would be more than happy to have the Verizon [change management] process in BellSouth." (Tr. at 243, line 19, provided as Exhibit WNS-4). She further stated that "we [the CLECs] would be in favor of the current process that works in New York, Pennsylvania, Massachusetts, New Jersey, and I believe it is very similar to what is in Verizon Florida." (Tr. at 244, line 2, Exhibit WNS-4).
34. By making these comments, Ms. Lichtenberg implied that BellSouth was being unreasonable in "refusing" to adopt the Verizon plan. However, while stating in Florida

the CLECs' preference for the Verizon plan, the changes to the CCP proposed by the CLEC Coalition in Georgia bear little, if any, resemblance to the Verizon plan. In fact, BellSouth has proposed to incorporate certain language from the Verizon plan into the CCP to which the CLECs have objected. During the monthly CCP meeting on February 27, 2002, BellSouth tried to get the CLECs to clarify their preferences given Ms. Lichtenberg's statements at the Florida Workshop. Ms. Lichtenberg responded by stating that the CLECs did not want the Verizon plan after all but preferred adoption of the changes proposed in Georgia instead. A copy of the minutes of that meeting containing that discussion is provided as Exhibit WNS-5 (see page 8). Ms. Lichtenberg's sudden change of heart about what the CLECs really want with respect to modifying the CCP underscores the difficulty in trying to reach consensus on some of these proposed changes and highlights the need for process issues to be resolved by state public service commissions in the event the industry cannot reach agreement.

**The CCP Has Procedures For The Timely Resolution of Change Management Disputes**

35. Consistent with FCC requirements, the CCP document has clear escalation and dispute resolution procedures, and no CLEC appears to contend otherwise.
36. The escalation procedure is clearly defined in Section 8 of the CCP document. As agreed to by the CLECs and BellSouth, this escalation procedure includes the names, titles, and contact information for the BellSouth individuals to whom CLECs may appropriately escalate issues (1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> levels within different areas within which escalations might occur). BellSouth managers at the 3<sup>rd</sup> level have broad decision-making authority within their areas of responsibility and understand the use of further escalation within the company in situations where issues cannot be satisfactorily resolved. The escalation procedure also includes specific time frames by which the BellSouth individuals to whom issues are escalated must respond, which were agreed to by the CLECs and BellSouth.

37. The CCP document also clearly defines the rights of both CLECs and BellSouth to take issues beyond the CCP escalation procedures, by invoking dispute resolution procedures before the appropriate state public service commission. These include seeking state commission mediation or filing a complaint with the state commission to resolve any disputed issues that cannot be satisfactorily closed through the escalation procedures.
38. Use of the escalation and dispute resolution procedures under the CCP has been relatively rare, which is further indication that the CCP is working effectively. In those few cases when a CLEC has availed itself of the escalation process, BellSouth revised its position in several instances and agreed with the CLEC escalating the issue. In other instances, BellSouth did not resolve the issue to the CLEC's satisfaction, although in no case has a CLEC elected to avail itself of the dispute resolution procedures before the appropriate state commission.
39. The CLECs and BellSouth agreed to the current escalation and dispute resolution procedures under the CCP, and several state commissions have endorsed the reasonableness of these procedures. *See* Final Order on Arbitration, *Petition by AT&T Communications of the Southern States, Inc., et al., for Arbitration of Certain Terms and Conditions of A Proposed Agreement With BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252*, FPSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP, at 120 (June 28, 2001) (finding that the dispute resolution process under the CCP is “equitable, well-defined and inclusive”); *See also* Order, *Petition of AT&T Communications of the Southern States, Inc., et al., for Arbitration of Certain Terms and Conditions of Proposed Agreement With BellSouth Telecommunications, Inc.*, GPSC Docket 11853-U, at 14 (April 24, 2001) (finding that “[i]f parties have disputes arising from the CCP, then they should adhere to the escalation and dispute resolution process included in the CCP Document”) (App. H, Tab 12).

40. Even though the current escalation and dispute resolution procedures are reasonable, in an on-going effort to be responsive to CLEC needs, BellSouth has proposed adding another escalation level to the Change Management process. Specifically, BellSouth has proposed through the CCP that the Network Vice President for Wholesale Operations, Trip Agerton, be added to the escalation list in CCP. This issue will be discussed at the March 28, 2002 meeting of the CCP. A copy of the notice to CLECs to add this topic to the meeting agenda is attached as Exhibit WNS-6.

**The CAVE Testing Environment Is Stable and Mirrors Production**

41. As explained in ¶¶ 167-180 of my original affidavit filed on October 2, 2001, ¶¶ 98-126 of my reply affidavit filed on November 13, 2001, and ¶¶ 135-144 of the joint supplemental affidavit filed on February 14, 2002, BellSouth has implemented a testing environment – CAVE – that satisfies the Commission’s requirements for a “stable testing environment that mirrors production.” BellSouth has continued to expand the capabilities of CAVE, for example, by allowing CLECs to conduct testing in CAVE using the LENS interface. On pages 27-28 of its Supplemental Comments, Birch “applauds” the testing of LENS in CAVE and describes its experience as a beta tester of LENS in CAVE, which began on January 29, 2002, as “successful.”
42. In ¶¶ 153-159 of her declaration, Ms. Lichtenberg of WorldCom criticizes CAVE, complaining about the nature of CAVE and the alleged problem with WorldCom’s production notifiers.<sup>3</sup> Mr. Bradbury and Ms. Norris of AT&T, in ¶¶ 170-175 of their supplemental reply declaration, also complain about the relationship between CAVE and production.
43. BellSouth has previously refuted AT&T’s and WorldCom’s unfounded allegations about the relationship between CAVE and BellSouth’s production system, including

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<sup>3</sup> These claims that are identical to those that Ms. Lichtenberg made in October 2001.

WorldCom's allegations about the production notifiers, in ¶¶ 102, 104-108, and 115 of my reply affidavit of November 13, 2001, and in ¶¶ 137-141 of the joint affidavit of February 14, 2002. In their latest declarations, WorldCom's and AT&T's witnesses make no attempt to even address BellSouth's evidence, electing instead merely to repeat blindly the same tired allegations without offering any new evidence as support.

44. Furthermore, AT&T's and WorldCom's complaints about the relationship between CAVE and BellSouth's production system must be balanced against the dearth of complaints from other users of CAVE. Since it was made available in July 2001, ten CLECs and vendors have successfully tested pre-ordering and ordering functionality in CAVE without any major issues and without the problems about which AT&T and WorldCom complain. On pages 24-25 of its Supplemental Comments, the Georgia PSC found this evidence to be particularly persuasive in concluding that BellSouth's CAVE testing environment satisfied the requirements of this Commission and adequately addressed concerns previously expressed by the Department of Justice ("DOJ").
45. Ms. Lichtenberg, in ¶ 157 of her declaration of March 4, 2002, returns to Florida Exception 6, which she also discussed in her affidavit filed in October 2001. I discussed Florida Exception 6 in ¶ 644 of my affidavit of October 2, 2001. As I explained in ¶ 125 of my reply affidavit of November 13, 2001, Florida Exception 6 is about BellSouth's original test environment, not the CAVE environment. BellSouth has used a separate test environment (BellSouth's original testing environment) to conduct system readiness testing of new entrants using the EDI interface since 1997. KPMG felt the test environment, along with internal and external documentation, could be improved and issued Florida Exception 6. BellSouth has responded to Florida Exception 6 and has provided KPMG with documentation and information about the technical details on the environment in an effort to satisfy the exception and resolve the issue. Regardless, this



issue has nothing to do with the adequacy of CAVE, notwithstanding Ms. Lichtenberg's claims to the contrary.

46. In ¶ 157 of her declaration, Ms. Lichtenberg refers to Florida Exception 128, in which KPMG claimed that BellSouth did not support pre-order testing in CAVE. Apparently, KPMG has misunderstood what CLECs are able to test in CAVE, because CAVE has always allowed CLECs to test pre-ordering and ordering functions, as BellSouth explained in its response to KPMG regarding this exception. Furthermore, as explained in this affidavit and in the Joint Affidavit filed on February 14, 2002, parsing, which is a pre-ordering function, is available for testing in CAVE, which underscores that pre-ordering functionality can be tested in CAVE.
47. In ¶ 173 of their joint supplemental declaration, Mr. Bradbury and Ms. Norris of AT&T erroneously state that CLECs will not begin using LENS in CAVE until March 25, 2002. This statement ignores that CLECs have been beta testing LENS in CAVE since January 2002 (see my reference to Birch's testing below). Mr. Bradbury and Ms. Norris of AT&T, in ¶ 173, also continue to complain that BellSouth excludes RoboTAG™ from testing in CAVE. I discussed BellSouth's reasons for this decision in ¶ 120 of my reply affidavit of November 13, 2001 and in ¶¶ 176-177 of my affidavit of October 2, 2001, in which I explain that when BellSouth modifies RoboTAG™, BellSouth does all the programming, making it unnecessary for CLECs to do any work; thus from this perspective there is little for CLECs to "test." In addition, throughout the development of the CAVE testing process, no CLEC submitted a change request asking that the RoboTAG™ interface be included in the testing environment.

**The Documentation For Building An Electronic Gateway Is Good**

48. BellSouth provides extensive and comprehensive documents that CLECs can and have used in building electronic gateways. The efficacy of BellSouth's documentation for

building electronic gateways is illustrated by the fact that an average of 35 CLECs use EDI and an average of 65 CLECs use TAG each month. Furthermore, more than 300 CLECs have established at least one electronic interface (including EDI, TAG, LENS, RoboTAG™, TAFI, and ECTA) to BellSouth's OSS, which were used in 2001 to submit more than 4.1 million electronic service requests (89% of all requests submitted) and more than 325,000 electronic trouble reports.

49. In ¶¶ 176-178 of their Joint Supplemental Declaration, Mr. Bradbury and Ms. Norris of AT&T complain about the adequacy of the documentation BellSouth provides to CLECs. Importantly, Mr. Bradbury and Ms. Norris do not offer any evidence that AT&T has been unable to build an electronic gateway to BellSouth's OSS using the documentation provided by BellSouth. Nor do they provide evidence about any difficulties experienced by AT&T in making use of BellSouth's documentation. The lack of such evidence is telling.
50. Rather than discuss AT&T's experiences in building electronic gateways using BellSouth's documentation, Mr. Bradbury and Ms. Norris point to a limited number of exceptions and observations concerning alleged "deficiencies" in BellSouth's documentation that have been opened by KPMG in connection with the Florida third-party test. BellSouth's position on the exceptions and observations from the Florida third-party is set forth in Exhibits WNS-7 (open exceptions) and WNS-8 (a summary of the status of all observations and exceptions, opened and closed).<sup>4</sup> However, suffice it to say, the alleged "deficiencies" in BellSouth's documentation have not prevented any CLEC, including AT&T, from building an electronic gateway to BellSouth's OSS or from making full use of BellSouth's systems. Even AT&T does not contend otherwise. Nor could it, given that AT&T has built an electronic gateway using BellSouth's

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<sup>4</sup> The exceptions and observations related to metrics are discussed in the Supplemental Reply Affidavit of Alphonso Varner.

documentation that it has successfully used to submit numerous electronic service requests and electronic trouble reports to BellSouth.

**BellSouth Has Demonstrated A Pattern Of Compliance With The CCP**

51. BellSouth has demonstrated a pattern of compliance with the requirements of the CCP. Through the CCP, BellSouth has responded to CLEC-initiated change requests in a timely fashion, has promptly provided the requisite documentation associated with upcoming releases, and has implemented more than 330 change requests (which include regulatory mandates, industry standard changes, BellSouth- and CLEC-initiated requests, and defects). BellSouth also has corrected defects within the timeframes set forth in the CCP. In short, the CCP is working well.
52. Under Section 4 of the CCP, BellSouth has ten (10) business days from the acknowledgment of a BellSouth- or CLEC-initiated change request by which to accept or reject the change request. This ten-day period has been part of the CCP document since September 2001. During the fourth quarter of 2001, BellSouth received 19 BellSouth- and CLEC-initiated change requests, 18 of which (95%) were accepted or rejected within this ten-day period.
53. AT&T's claim, in ¶ 145 of the Joint Supplemental Declaration of Mr. Bradbury and Ms. Norris, that BellSouth did not meet the ten-business day interval for any of the 29 change requests in "new" status as of February 20, 2002 is misleading. As AT&T acknowledges, the majority of the change requests in "new" status were actually submitted before the ten-business day interval was even incorporated into the Change Management process in September 2001. BellSouth can hardly be faulted for not complying with a deadline before it took effect.
54. In connection with the ongoing review of the CCP by the Georgia PSC, BellSouth has agreed to implement a new performance measure (CM-7), which captures the percent of

change requests (other than Type 1 or Type 6 change requests) submitted by CLECs that are accepted or rejected by BellSouth within ten (10) business days. This new measure will allow regulators and CLECs to monitor BellSouth's ongoing compliance with the CCP requirements for accepting or rejecting change requests.

55. Section 6 of the CCP sets forth specified timeframes by which BellSouth must deliver draft User Requirements, final User Requirements, Final Specifications, and Business Rules (if applicable), which vary depending upon whether the release is a Major Release, Industry Release, or Minor Release. BellSouth routinely complies with these timeframes.
56. To be sure, there have been situations when BellSouth did not deliver documentation associated with a release within the time periods specified in Section 6 of the CCP. However, as reflected in BellSouth's response to Exception 155 opened by KPMG in connection with the Florida third-party test, which is discussed in ¶¶ 181-185 of Mr. Bradbury and Ms. Norris's Joint Supplemental Declaration, BellSouth promptly disseminates OSS documentation. Exception 155 is attached as Exhibit WNS-9.
57. A good example concerns the business rules for the Parsed CSR functionality, which were distributed on December 18, 2001; under the CCP, these business rules should have been provided on November 30, 2001. However, BellSouth had previously made available to CLECs a number of documents concerning parsed CSR functionality as early as September 2001. These documents included: (i) BellSouth User Specifications, which were provided to CLECs through the CCP on September 6, 2001 and discussed with CLECs on September 20, 2001; (ii) Preliminary Field Specifications, which were provided to CLECs on October 12, 2001 and which could be used by CLECs to assist in their preliminary coding efforts; (iii) TAG API Guide, which was published on November 19, 2001, and which provides details used for coding the CLEC interface; (iv)

CSR Job Aid, which was updated on November 9, 2001 to include information on parsed CSRs; and (v) updated Pre-Order Business Rules, which were provided on December 13, 2001 to include information for requesting parsed CSRs. CLECs and vendors were able to use these documents in coding and testing the parsed CSRs functionality, even though BellSouth missed the deadline for providing the parsed CSR Business Rules by 18 days.

58. Although the CCP sets forth timeframes for the delivery of OSS documentation, it is understood and agreed within the CCP that these timeframes may be adversely impacted in order to accommodate BellSouth or CLEC requests for changes in the course of reviewing such documentation. For example, in connection with Release 10.4, BellSouth provided draft user requirements on December 13, 2001, and final user requirements on January 29, 2002. Although the intervals in the CCP would have required that the draft and final user requirements for Release 10.4 be provided on November 10, 2001 and November 17, 2001 respectively, during the user requirement review session, CLECs asked that the user requirements include more explicit language with regard to CLEC-impacting changes. BellSouth agreed to revise and enhance the document, but indicated that by so doing the final user requirements would not be distributed until January 2002. BellSouth provided the final user requirements consistent with this timeframe with the concurrence of the CCP.
59. In certain instances when implementing regulatory mandates, it may not be possible for BellSouth to comply with the documentation timeframes in the CCP. For example, on February 15, 2002, an e-mail was sent to members of the CCP stating that business rules for CR0657, which was a regulatory mandate that implemented a Local Service Freeze as part of Release 10.4, would be provided via Carrier Notification Letter on February 22, 2002. The business rules were posted on February 22, 2002. BellSouth met the CCP

guidelines for dissemination of the business rules, even though the implementation of Release 10.4 was advanced to March 23, 2002 from April 6, 2002.

60. In order to ensure that the OSS documentation provided by BellSouth adequately meets the needs of CLECs, the CCP has established a Documentation Subcommittee, which held its first meeting on February 15, 2002. The purpose of the Documentation Subcommittee is to discuss expectations and consider improvements to the documentation associated with each Release, including User Requirements, Business Rules, EDI Specifications and the TAG API Reference Guide. BellSouth is currently reviewing the CLEC suggestions, which will be discussed at the next meeting of the Documentation Subcommittee. A copy of the minutes from the March 8, 2002 meeting of the Documentation Subcommittee is attached as Exhibit WNS-10
61. Often overlooked in the CLEC rhetoric about Change Management is the success BellSouth has achieved in actually implementing change requests. Between the inception of the Change Management process in June 1999 and March 24, 2002, BellSouth has received 700 Change Requests (which include regulatory mandates, industry standard, BellSouth- and CLEC-initiated, and defects). Of these 700 Change Requests, 210 have been cancelled, which leaves 490 Change Requests eligible for implementation. Of these 490 Change Requests, 338 have already been implemented (69%), 55 are scheduled for implementation (11%), 50 are awaiting prioritization by the CLECs (10%), and 7 are waiting to be scheduled (1%). The remaining 40 change requests (8%) are in “new” or “pending clarification” status and are described in greater detail below. However, that BellSouth has already implemented or scheduled for implementation 80% of the Change Requests received since the inception of the Change Management process is compelling evidence that the process is working. To summarize:

Total Change Requests	700
Cancelled Change Requests	210
Total Change Requests Eligible for Implementation	490

Change Requests Already Implemented	338
Change Requests Scheduled for Implementation	55
Change Requests Awaiting Prioritization by CLECs	50
Change Requests Waiting to be Scheduled	7

Change Requests in “New” or “Pending Clarification” Status	40
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62. Although several CLECs, including Birch, Covad, and AT&T, complain about a “backlog” of change requests, these complaints misrepresent the Change Management process. The “backlog” about which the CLECs complain in actuality consists of, at most, the 40 Change Requests that are in “new” or “pending clarification” status. These 40 Change Requests represent approximately 8% of the 490 Change Requests eligible for implementation, which hardly constitutes a “backlog.”
63. Furthermore, the 40 Change Requests in “new” or “pending clarification” status must be put in proper context and hardly suggest that BellSouth is intentionally delaying the implementation of Change Requests as asserted by AT&T and WorldCom. In particular, of these 40 Change Requests, BellSouth: (i) has indicated that it cannot support 14 of the Change Requests (35%), which the CLEC has neither cancelled nor escalated; (ii) has rejected 9 of the Change Requests (22%), but the CLEC has requested that BellSouth reconsider its decision or has escalated the issue; (iii) is currently reviewing 8 of the

Change Requests for acceptance (20%); (iv) has implemented workaround solutions for 3 Change Requests (8%); and (v) has requested clarification from the CLEC for 3 of the Change Requests, which the CLEC has never provided (8%). The remaining 3 Change Requests in “new” or “pending clarification” status are related to the Change Management process and are being worked or discussed with the CLEC community.

64. In ¶ 99 of her Declaration, Ms. Lichtenberg attempts to compare the number of Change Requests implemented by BellSouth in “20 months” versus the number implemented by Verizon in a one year period between October 2000 and October 2001. Such a comparison is misguided. Although it is unclear to what “20 month” period she is referring, Ms. Lichtenberg has attempted to skew BellSouth’s performance by intentionally ignoring the last several BellSouth releases, which implemented a significant number of CLEC prioritized requests. As of March 24, 2002, BellSouth has implemented a total of 38 Change Requests initiated by BellSouth (Type 4) and 37 Change Requests initiated by CLECs (Type 5). The 75 Change Requests that BellSouth has implemented portray a completely different picture than the one Ms. Lichtenberg attempts to paint by claiming that BellSouth only implemented “17 prioritized requests ... in 20 months.” Lichtenberg Decl. ¶ 99.
65. There are no specified timeframes in the current CCP document for the implementation of Change Requests. However, BellSouth is sensitive to CLEC concerns about the timeliness by which Change Requests have been implemented. For this reason, BellSouth has committed to implementing the “top 15” CLEC prioritized Change Requests this year and is well on its way to meeting this commitment.
66. BellSouth’s progress in implementing Change Requests is illustrated by the work completed just in the past three months. On January 5, 2002, BellSouth implemented Release 10.3, which included the following key OSS enhancements: parsed CSR



- (CR0369); Mechanized Line Splitting (CR0441); New Install with No Prior Service at Location (CR0229); and Line Splitting - Remove LMU Edit (CR0409).
67. On February 2, 2002, BellSouth implemented Release 10.3.1. Although designated a maintenance release, it also contained some key OSS enhancements, including: allowing Electronic Processing of Unbundled Universal Digital Channel (“UDC”) Loop Orders (CR0557); validation on Telephone Number vs. Address – ReqTypes A<sup>5</sup> and E<sup>6</sup> (CR0371); Enhancements to Hunting (CR0606); Phase 1a – Order Tracking (CR0040); and migration of UNE-P Notifications (CR0133).
68. On March 23, 2002, BellSouth implemented Release 10.4, which included the following key OSS enhancements: Service Inquiry Enhancement for SL1, SL2 DS0, DS1 and ISDN (CR0016); Flow-through ReqType CB<sup>7</sup>, Acts of P<sup>8</sup> and Q<sup>9</sup> (CR0137); Add Ability to Create New Listings in LENS (CR0096); Local Service Freeze for ReqType M Non-complex (CR0657); Single C-Order Process; Parsed CSR – Hunting (CR0651); and Phase 1b – Order Tracking (CR0040).
69. While AT&T and WorldCom prefer focusing on the distant past in evaluating BellSouth’s Change Management process, the last six months provide compelling evidence that the CCP is working effectively. This is the conclusion reached by the Georgia PSC, and the DOJ has expressly found that the record on the Change Management issue “supports approval” of BellSouth’s application.
70. In ¶¶ 102-103 of her Declaration, Ms. Lichtenberg of WorldCom complains about the time it takes BellSouth to allow CLECs to prioritize change requests, noting that “[n]o additional requests have been prioritized since April 2001.” This complaint ignores that

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<sup>5</sup> Requisition Type (REQTPY) A identifies LSRs submitted for Loop only Service.

<sup>6</sup> Requisition Type (REQTPY) E identifies LSRs submitted for Resale Service.

<sup>7</sup> Requisition Type (REQTPY) CB identifies LSRs submitted for Port only Service.

<sup>8</sup> Account Level Activity Type (ACTTYP) P identifies LSRs submitted for conversion as specified, partial migration – initial.

<sup>9</sup> Account Level Activity Type (ACTTYP) Q identifies LSRs submitted for conversion as specified, partial migration – subsequent.

the CCP – not BellSouth – decides when prioritization meetings are held. Furthermore, the CCP held a prioritization meeting on March 27, 2002 – a fact Ms. Lichtenberg conveniently neglects to mention.

71. Furthermore, Ms. Lichtenberg’s discussion of Change Request CR0186, which involves the use of Interactive Agent protocol, in ¶ 106 of her Declaration, illustrates the hypocritical approach that CLECs, including WorldCom, often exhibit toward the CCP. Ms. Lichtenberg notes that Interactive Agent was assigned a relatively low priority by the CCP (21<sup>st</sup> out of 36 change requests), which readily explains why the Change Request has not been implemented. However, what Ms. Lichtenberg does not bother telling the Commission is that WorldCom filed a petition on January 18, 2002, requesting that the Georgia PSC “force” BellSouth to implement Interactive Agent, even though this change request is not a high priority for other CLECs. If the Georgia PSC were to grant WorldCom’s request, BellSouth would be required to divert resources that would otherwise be used to implement those change requests that the CLECs have indicated are a high priority. As a result, while on the one hand espousing the sanctity of the CCP and the importance of the prioritization process, WorldCom is more than willing to subvert that process when its change requests are not assigned a high priority by other CLECs.
72. At ¶ 149 of their Declaration, Bradbury and Norris state that BellSouth impeded the CLECs’ ability to compete by failing to implement certain change requests. First, my affidavits filed on October 2, 2001, and later, in addition to all the evidence that BellSouth has filed in CC Dockets 01-227 and 02-35, show that CLECs have nondiscriminatory access to BellSouth’s OSS and are competing with BellSouth. Second, I will discuss some of the change requests that AT&T has used as examples of BellSouth’s alleged failure to implement change requests (CR0135, CR0461, and

CR0625). This discussion will show that AT&T has mischaracterized BellSouth's handling of these change requests.

73. Although BellSouth agrees that the CLEC participants did prioritize change request CR0135 as number 4 on April 25, 2001, BellSouth believes that AT&T has omitted important details that explain BellSouth's handling of the change request.<sup>10</sup> CR0135 requested that BellSouth provide the CLECs with the capability to order partial migrations using one LSR.<sup>11</sup> Attached as Exhibit WNS-11 is CR0135 which contains a chronology of the events surrounding this change request, which if anything, shows BellSouth's willingness to work cooperatively with the CLECs in the CCP process.
74. At the time that this change request was submitted and then prioritized by the CLECs, this issue was part of the pending OBF Issue 1792 (Migrations). BellSouth is committed to support the OBF guidelines, including those surrounding Issue 1792. These guidelines will drive how BellSouth will address this issue.<sup>12</sup> On December 6, 2001, BellSouth informed the originator of the change request, AT&T, that the OBF had discussed two new fields, NEWATN and ATNREP, for this issue. BellSouth believed these fields would help with the implementation of CR0135. The OBF, however, did not approve these fields, instead approving the new field NATN (New Account Telephone Number).<sup>13</sup> BellSouth asked AT&T to have its OBF representative partner with

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<sup>10</sup> Although its complaints are not directed at change request CR0135, Mpower, at page 10 of its Supplemental Comments, has complained that it must use “multiple local service requests (“LSRs”) and CSRs for orders and accounts that BellSouth’s retail division has on one bill. When the CLEC tries to order by submitting a single LSR, the order is rejected.” This is the same complaint about partial migrations that it made in its Comments filed in October 2001 and to which I replied in ¶¶ 177-184 of my Reply Affidavit of November 13, 2001. In that affidavit, I explained why two LSRs had to be submitted and provided two scenarios to illustrate the situation.

<sup>11</sup> To BellSouth’s knowledge, VerizonWest is the only ILEC that provides this capability. VerizonWest, however, uses a different type of billing system.

<sup>12</sup> Step 3 of Section 4.0 of the CCP document contains the following language, “All change requests that are being actively discussed at OBF, or are on the agenda to be discussed, will be deferred. If the issue is not active and will not be considered within the next six (6) months, and there is agreement between BellSouth and affected CLECs to proceed prior to an OBF resolution, BellSouth will determine if it can support the request.”

<sup>13</sup> This field will allow the CLEC to provide a new main account telephone number therefore allowing the change, during migration, of the main account telephone number.

BellSouth's OBF representative to discuss use of this field to satisfy the change request, and that AT&T consider having its and BellSouth's OBF representatives jointly support this field at the OBF. On February 15, 2002, BellSouth and AT&T met to discuss BellSouth's recommendation of partnering at OBF for the use of the NATN field to support this request. AT&T participants on the call agreed that the NATN field be used to (1) change the main telephone number during migration, and (2) to combine already migrated accounts using a single LSR. Five days later, Bradbury and Norris of AT&T filed their Declaration criticizing BellSouth's handling of change request CR0135.

BellSouth understands that AT&T is continuing to review this recommendation with its OBF representative and has not provided BellSouth or the CCP with its decision.

75. BellSouth submitted CR0461 (Facility Check Before FOC) as a Type-4 change request on August 16, 2001. The impetus for this request came out of the CLEC Collaborative Workshops held by the Louisiana PSC after the CLECs complained in the Workshops about the inability to check and confirm facilities prior to receiving a firm order confirmation ("FOC"). Because no CLEC had actually issued a change request for this very complex capability, BellSouth agreed to do so. The CR has never been prioritized because the CLECs have chosen not to prioritize any change requests since April 2001. In February 2002, as BellSouth continued development of the requirements, the Florida PSC ordered BellSouth to implement this feature.<sup>14</sup> The requirements were completed; the CR was changed to a Type 2 – Regulatory Mandate change request. It is scheduled for implementation in Release 10.5 on May 18, 2002.
76. The details about the ADL 11 USOC and CR0625 may be found in the Affidavit of Eric Fogle, filed on March 28, 2002. It should be noted, however, that Birch submitted its

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<sup>14</sup> See Order Approving BellSouth Performance Assessment Plan, *Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies*, FPSC Docket No. 000121-TP, Order No. PSC-02-0187-FOF-TP (Feb. 12, 2002).

request to the Flow-Through Task Force on January 25, 2002. The CCP put this change request in “pending” status on February 22, 2002, and therefore, it is ready to be scheduled for implementation. Because it originated in the Flow-Through Task Force, CR0625 is a Type 2 (regulatory) request and will likely be prioritized by the CLECs during the Flow Through Task Force in early April 2002.

77. In those instances when a release contains a defect, Section 5 of the CCP sets forth the timeframes by which those defects must be corrected, depending upon the type of defect involved as defined in the CCP. Specifically, in the case of a High Impact Defect, BellSouth is required to implement a correction within ten (10) business days; in the case of a Medium Impact Defect, BellSouth has 90 business days within which to implement a correction; for a Low Impact Defect, BellSouth must implement a correction as soon as practicable.<sup>15</sup>
78. The timeframes for the resolution of defects were added to the CCP on September 10, 2001. Since these timeframes were put in place, BellSouth has consistently corrected High and Medium Impact defects within the specified periods. For example, since September 10, 2001, BellSouth has identified 7 High Impact Defects associated with its releases; 4 were corrected within ten (10) business days, and 1 High Impact Defect is scheduled to be corrected within the ten-day period. Although BellSouth missed the ten-day period in correcting 2 High Impact Defects, it did so only by two days in both instances and only to coordinate the correction of the defect with an upcoming release.
79. BellSouth’s performance in correcting Medium Impact Defects has been even more impressive. Since September 10, 2001, BellSouth has identified 16 Medium Impact

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<sup>15</sup> Contrary to the assertion of Mr. Bradbury and Ms. Norris in ¶ 22 of their Joint Supplemental Declaration, there is no requirement under the current CCP that BellSouth correct Low Impact Defects within 120 days. Section 5 of the current CCP states that corrections for Low Impact Defects will be implemented on a “best effort” basis without any specified timeframe for resolution.

Defects, 7 of which were corrected within 90-business days, and 9 of which are scheduled to be corrected within this 90-business day interval.

80. BellSouth's adherence to the timeframes for correcting defects as set forth in the CCP belies Ms. Lichtenberg's claim at ¶ 143 of her Declaration that "BellSouth often fails quickly to remedy those defects." While Ms. Lichtenberg may believe the timeframes in the current CCP for resolving defects are "too long," BellSouth can hardly be faulted for complying with the current Change Management process. Furthermore, WorldCom's desire to shorten the existing defect correction intervals is an issue best addressed by the Georgia PSC in the event BellSouth and the CLECs are unable to reach agreement on this issue.<sup>16</sup>
81. In connection with the ongoing review of the CCP by the Georgia PSC, BellSouth has agreed to implement a new performance measure (CM-6), which captures whether CLECs receive timely correction of BellSouth software defects. This new measure will allow regulators and CLECs to monitor BellSouth's ongoing compliance with the CCP requirements concerning the timeliness of defect corrections, whatever those requirements ultimately turn out to be.
82. In ¶ 142 of her Declaration, Ms. Lichtenberg of WorldCom suggests that BellSouth's releases have too many defects because BellSouth allegedly fails to follow its software testing and quality processes, pointing to Exception 157 issued by KPMG in connection with the Florida third-party test. BellSouth has investigated KPMG's findings and disagrees. As explained in detail in BellSouth's Response to Exception 157, a copy of which is Exhibit WNS-12, BellSouth follows its software testing and quality processes

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<sup>16</sup> Although there are no deadlines for the correction of Low Impact Defects under the current CCP, BellSouth generally corrects such defects in a timely manner. For example, of the 29 Low Impact Defects that have been implemented since September 20, 2001, 18 (62%) were implemented within one month, and the remaining 11 (38%) were implemented in one to three months. As part of the ongoing review of the CCP by the Georgia PSC and in an attempt to address CLEC concerns about the existing timeframes for correcting defects, BellSouth has proposed to change the current language concerning Low Impact Defects by committing to implementing corrections to such defects "in the next available release."

for each release, including Releases 10.2 and 10.3, which are the subject of KPMG's Exception 157.

83. BellSouth's testing and quality processes for the implementation of a release, including Releases 10.2 and 10.3, include the following: (i) completion of at least 98% of System, Performance and Regression testing; (ii) a test case pass rate of at least 97%; (iii) no Severity 1 defects outstanding; and (iv) no Severity 2 defects outstanding that do not have a path forward for completion and do not have a mechanized workaround. For its internal testing, BellSouth's goal is to allow sufficient time for appropriate pre-release testing within the release schedule. BellSouth's testing cycle includes unit/product testing, system/integration testing, performance testing, regression testing and user acceptance testing. Both Release 10.2 and Release 10.3 met BellSouth's testing and quality standards.
84. On pages 27-28 of its Supplemental Comments, Birch remarks that it is uncertain as to how BellSouth handles defects identified in the testing environment and whether they will be resolved before a release is put into production. The following is an overview of the current defect management process. If a CLEC discovers a defect during testing in CAVE, it should notify its BellSouth Test Manager. BellSouth then would validate the defect. Next, an internal technical support team would revalidate the defect. Once the defect had been confirmed, it would be prioritized by its severity. Per the requirements of the test agreement between BellSouth and the CLEC that reported the defect, BellSouth then would advise that CLEC of the defect. The testing CLEC has the option of notifying other CLECs if it desires.
85. The BellSouth's testing processes adhere to the industry standard model of testing, which include: (1) testing at the software unit level; (2) combining multiple units and conducting "string testing"; (3) assembling the various software units into their final

configuration and conducting system testing; (4) turning the software over to the business unit requirement group for user acceptance testing; and finally (5) placing the software in CAVE for CLEC testing. As defects are identified at various stages of the process, they are documented and corrected, if possible. Immediately prior to the production release date, any remaining defects are evaluated for impact, and a decision is made about whether to go into production, or to delay the production release and continue work to correct the defects.

86. BellSouth recently discussed this process with the CLECs during its monthly CCP meeting on February 27, 2002. *See* Exhibit WNS-5. During that meeting the representatives of some CLECs expressed concern about BellSouth current process, for example that BellSouth should notify the CCP participants and obtain CLEC input on impacts, and that the testing documentation needed to be revised. BellSouth reported that it was in the process of updating the documentation. CLECs were also curious about the process BellSouth has used when it has found an internal defect. BellSouth explained that internal testing was performed before the release was loaded in CAVE. The intent is to find and correct all defects before putting release in CAVE for the CLECs to test. During this meeting, the CLECs suggested that BellSouth review their suggestions for testing that are contained in the “redlined” version of the CCP document filed with the Georgia PSC, which BellSouth agreed to do and to respond at the March 27, 2002 CCP meeting.
87. WorldCom and AT&T criticize the Release 10.3 software that contained the parsed CSR functionality. This software was released into production with 23 low impact defects.<sup>17</sup> These defects represented an error rate of approximately 0.2% post release defects measured against the total instances of parsed CSR fields tested during the entire cycle

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<sup>17</sup> The parsed CSR and the resolution of these defects was discussed in the Joint Affidavit filed on February 14, 2002, and elsewhere in this affidavit.



(over 10,000 instances of fields were tested in 516 test cases). This low defect rate demonstrates that BellSouth's testing and defect correction process is effective, notwithstanding WorldCom's and AT&T's claims to the contrary.

88. BellSouth's commitment to follow its software testing and quality processes and can be gauged by considering "defect density," which is an industry standard method for measuring software quality. "Defect density" is measured in the number of defects released into production code per 1000 lines of software code ("KLOC"). BellSouth's defect density for 2001 was 0.09 defects per 1000 lines of code, including the LENS, LEO, LESOG, TAG, DOM, COG, SOG, and EDI applications. This rate is equivalent to finding less than 1 defect in every 10,000 lines of code in these applications.
89. Additionally, despite the CLECs' allegations, KPMG's Exception 157, and the DOJ's concerns (see page 10 and footnote 39 of the DOJ's Evaluation), BellSouth does allow sufficient time for release testing and accomplishes all or nearly all of its planned testing for each release. As noted in its response to Exception 157, BellSouth mitigates the risk of reduced time for testing in a variety of ways, including adding more test case automation, and where required, increasing the number of trained testing personnel. For three recent software releases, Releases 10.2, 10.3, and 10.4, BellSouth completed 100%, 99.9%, and 100% of the planned testing, respectively.
90. In ¶¶ 192-193 of their Joint Supplemental Declaration, Mr. Bradbury and Ms. Norris discuss Observation 124 and Exception 123 issued by KPMG in connection with the Florida third-party test, which they claim illustrate BellSouth's noncompliance with CCP requirements for the correction of defects. This claim is misguided.
91. KPMG issued Observation 124 in Florida, citing BellSouth's failure to follow the documentation defect procedures as detailed in CCP document. Observation 124 is based on the fact that BellSouth posted an incorrect version of the TAG API Reference Guide

to the website on October 1, 2001. In fact, the version posted was actually a draft, and not a final version. In any event, when the error was discovered, BellSouth posted the correct version on October 3, 2001. This two-day delay hardly denied any CLEC a meaningful opportunity to compete.

92. KPMG issued Exception 123 in Florida advising that BellSouth “is not classifying Change Requests as defects in accordance with the BellSouth definition of a defect.” KPMG gave specific examples of items that were initially classified as defects, and later re-classified as system enhancements (features). Defects 15369 and 15652 were re-classified as features due to the lack of business rules/requirements to support the activity. In the Change Control Process, a system enhancement (*i.e.*, feature) is a function which has never been introduced into the system; improving or existing functions; required functional changes to system interfaces, data, or business rules; or any change in the User Requirements in a production system. KPMG also referenced a Help Desk Issue resulting in a “back end resource error limitation” message to CLECs. Discovered during CAVE testing, this item was classified as a “low impact” defect and was corrected in Release 10.3.1 on January 5, 2002. As detailed in BellSouth's response to Exception 123, the CCP process has specific time frames for responding to defects based on the severity of the defect. BellSouth is committed to honoring those time frames for defects. BellSouth will continue to clarify when change requests the CLECs think may be defects are really features as indicated above, and will work features in accordance with the CLECs’ CCP prioritization.
93. KPMG also cited that with the implementation of Release 10.2 on November 3, 2001, BellSouth identified the errors in the release causing 30% of CLEC orders to inappropriately reject. BellSouth did in fact issue Carrier Notification SN91082611 on November 2, 2001 advising that “during testing, BellSouth determined that there are two

or more addresses reflected in RSAG, and that the LSR will be rejected or auto clarified back to the CLEC requesting a valid address.” The letter also acknowledged that BellSouth would begin processing LSRs when a working address and a previous, non-working address is reflected in RSAG. The issue was resolved on November 17, 2001. Although a formal defect was not opened via CCP, BellSouth did communicate this issue through CCP via Carrier Notification.

**Other Change Management Issues**

94. In ¶¶ 157 and 164 of their Joint Supplemental Declaration, Mr. Bradbury and Ms. Norris of AT&T discuss Exception 88 issued by KPMG in connection with the Florida third-party test, which concerns the extent to which CLECs are involved in the prioritization of all CLEC impacting change requests. Ms. Lichtenberg of WorldCom raises this same issue in ¶ 110 of her Declaration. In an effort to address the CLECs’ and KMPG’s concerns about release resource planning, BellSouth formally proposed the following at the CCP Sub-committee Meeting on February 12, 2002. BellSouth will schedule change requests for regulatory mandates (Type 2), industry standards (Type 3) and defects (Type 6) prior to scheduling change requests submitted by BellSouth (Type 4) and those submitted by CLECs (Type 5). The release capacity remaining after scheduling Types 2, 3, and 6 will be used for scheduling Types 4s and 5s. The Types 4 and 5 capacity will be divided approximately 50% - 50%. BellSouth will provide the CLECs with a Release Capacity Measurement Feature Prioritization Matrix at the time of prioritization. BellSouth will also provide the CLECs the features planned via a Release Schedule. Additionally per the CLECs’ request, BellSouth will provide a Monitoring and Reporting Post-Release Capacity Utilization depicting the actual capacity used quarterly. Florida Exception 88 is attached as Exhibit WNS-13.

95. In ¶ 186 of their Joint Supplemental Declaration, Mr. Bradbury and Ms. Norris of AT&T accuse BellSouth of issuing “clarifications” to the BellSouth Business Rules (“BBR”) without following CCP procedures. BellSouth makes clarification only changes to clarify an item in the BBR. The content of the BBR is not changing. The CLECs are notified of these changes via Carrier Notification letters. This issue was first addressed during the February 15, 2002 Documentation Sub Team Meeting and subsequently in the February 27, 2002 CCP Monthly Status Meeting. During the February 27, 2002 meeting, the CLECs indicated they want to assess every change in the BBR for potential CLEC impacts. The CCP reached a consensus that, for clarification only changes, BellSouth will submit a list of clarification only changes to the CCP for discussion at the CCP Monthly Status Meetings. The list will include description of how the item is currently stated, proposed clarification change, page number, etc. The February 27, 2002 CCP Monthly Status/Process Improvement Meeting Minutes is attached as Exhibit WNS-5. February 15, 2002 CCP Documentation Sub-committee Meeting Minutes are attached as Exhibit WNS-14.

#### **IV. PRE-ORDERING**

##### **Integration**

96. BellSouth provides CLECs with the ability to integrate the pre-ordering and ordering interfaces and their back office systems consistent with the Commission’s requirements. Integration of the CLEC interfaces enables a CLEC to transfer pre-order information received electronically from BellSouth, through the CLEC’s own application-to-application interface, which can then be transmitted to BellSouth in the form of an LSR, and onto the CLEC’s back office systems.
97. Inherent to application-to-application interfaces is the flexibility that allows a CLEC to use resulting pieces of pre-order and order information in a manner that best suits its

business needs. In other words, the very nature of “application-to-application” means that the interface does not force the end user into a pre-determined flow; instead, the interface returns all data to the CLEC in an electronic format. This format allows the CLEC to store and use it without a human retyping or even seeing the data. All application-to-application interfaces include the flexibility to integrate to CLEC backend systems. These interfaces allow the CLEC to control the process flow followed by its service representatives to gather pre-order information from BellSouth and to save the information electronically behind the scenes of the CLEC’s sales and negotiation application, and then to automatically populate the information into an LSR, and to transmit the LSR upon completion of the negotiation. This type of integration is only possible with application-to-application interfaces.

98. BellSouth has provided CLECs with the resources to integrate their interfaces, including documentation, such as business rules and programming specifications, training, testing and consultation.<sup>18</sup>
99. In addition, BellSouth has also engaged a consulting expert, Accenture Launch Now™, to provide high level consulting advice to CLECs that are seeking to integrate pre-ordering and ordering functions. This vendor has worked extensively with BellSouth wholesale interfaces, including TAG and EDI, over the past several years.
100. To assist CLECs with their integration of application-to-application interfaces, BellSouth offers CLECs CSR information either in an unparsed stream of data, which the CLEC can parse on its side of the interface, or parsed into fields, which BellSouth performs on its side of the interface.
101. In the Joint Affidavit of February 14, 2002, BellSouth presented detailed evidence that CLECs have integrated their interfaces using the unparsed stream of data, and that it is

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<sup>18</sup> See the Joint Affidavit filed on February 14, 2002, ¶¶ 10-23, 76.

possible for CLECs to integrate using the parsed CSR. (See ¶¶ 8-88 of the Joint Affidavit filed on February 14, 2002.) In light of the comments by the CLECs, I will discuss both methods below.

102. On page 11 of its Supplemental Comments filed on March 4, 2002, the Georgia PSC noted that, in its Comments to the FCC filed in October 2001, it had “found that BellSouth had demonstrated that CLECs were able to integrate BellSouth’s pre-ordering and ordering interfaces consistent with applicable FCC requirements.” Since October 2001, as part of the Georgia PSC’s Docket No. 6863-U, the Georgia PSC has examined additional evidence of integration and believes that the Commission’s concerns regarding integration have been adequately addressed.
103. The Georgia PSC, in its Supplemental Comments of March 4, 2002, further stated that, “[s]pecifically, BellSouth established that CLECs were able to transfer pre-ordering information electronically into the CLEC’s own back office systems and back into BellSouth’s ordering interface.” Georgia PSC Supplemental Comments at 11. The Georgia PSC noted that evidence was presented that CLECs had successfully done so, and “no CLEC contended that it had been unable to integrate BellSouth’s pre-ordering and ordering systems.” *Id.*

**Integration with Parsing on the CLEC’s Side of the Interface**

104. Four parties, Access Integrated, GoComm/Exceleron, ITC^DeltaCom (via Comptel), and Momentum Business Solutions, have provided evidence showing that they have successfully integrated the TAG pre-ordering interface with the TAG or EDI ordering interfaces. These parties filed ex parte letters with the FCC describing the status of their integrated interfaces (CC Docket No. 01-277). *See* Exhibits SVA-6 through SVA-9 to the Joint Affidavit of February 14, 2002. These parties have integrated pre-ordering and ordering using the documentation and technical support provided by BellSouth. Access

Integrated, ITC^DeltaCom, and Momentum have also parsed the CSR on their side of the interface. In ex parte letters submitted with this application, three of these parties, Access Integrated, Exceleron, and Momentum have further clarified the documentation from BellSouth that they used and relied upon in implementing the integration functionality. *See* Exhibits SVA-3 through SVA-5 to the Joint Affidavit of February 14, 2002. In fact, Access Integrated was able to write the integration software in approximately thirty person days, as stated in Exhibit SVA-3 to the Joint Affidavit of February 14, 2002.

105. There is no significant question as to whether four CLECs have integrated BellSouth's pre-ordering and ordering interfaces using BellSouth's documentation. BellSouth has demonstrated that no party challenges that Access Integrated and GoComm have high flow through rates and low reject rates.
106. On page 11 of its Supplemental Comments, the Georgia PSC stated that CLEC were "able to automatically populate information supplied by BellSouth's pre-ordering systems onto an LSR that will not be rejected by BellSouth's ordering systems." The Georgia PSC recognized that CLECs are able to perform integration using the unparsed stream of data by noting the following evidence provided in the supplemental application, including:
  - (1) letters from four parties confirming their ability to integrate BellSouth pre-ordering and ordering functions while experiencing relatively low reject rates; and
  - (2) letters from KPMG Consulting, Inc. ("KCI") confirming that, as part of the Georgia third-party test, KCI successfully tested a CLEC's ability to integrate BellSouth's pre-ordering and ordering functions. *See* Georgia PSC Supplemental Comments at 11.
107. In addition to the evidence provided by the four CLECs that integrated their interfaces, BellSouth engaged Telcordia to review the documentation and other information

available to the CLECs, and to determine if the documentation would enable a CLEC to use its backend systems to integrate information exchanged with BellSouth's pre-order and order systems using TAG and EDI. Telcordia's test of BellSouth's systems was substantially the same as the test that it undertook in Texas and that this Commission found to provide 'additional assurance' that CLECs could integrate. *See Texas Order* ¶ 158. Telcordia issued its "Supplemental Readiness Report Pre-Order/Order Integration Analysis," which is attached as Exhibit WNS-15 and was filed on February 28, 2002 at the Commission as an ex parte. The Telcordia Supplemental OSS Readiness Report shows that:

- BellSouth provides sufficient information to enable a CLEC to integrate pre-order and order;
- A CLEC is able to query and store unparsed Customer Service Record ("CSR") information from BellSouth; and
- Use the now-parsed information in the BellSouth ordering process to populate a Local Service Request ("LSR").

108. As a result of its test, Telcordia concluded that BellSouth provides or references sufficient documentation and information to CLECs to enable them to use their backend systems to integrate the unparsed stream of CSR information with their backend systems.
109. Also of importance is that KPMG, using its own parsing tool, was able to parse CSR data appropriately to successfully complete several components of the Georgia test (PRE-1, PRE-3, O&P-1, O&P-2, O&P-8 and O&P-9). KPMG filed two letters at the Commission to explain how it carried out parsing during the third-party test in Georgia. *See Exhibits SVA-12 and SVA-13 to the Joint Affidavit of February 14, 2002.*
110. Bradbury and Norris, at ¶¶ 43-46 of their Joint Supplemental Declaration, make various unsubstantiated claims that BellSouth has not provided CLECs with the necessary tools



to integrate pre-ordering and ordering functionality on the CLEC’s side of the interfaces, and Lichtenberg at ¶ 7 of her Declaration, claims that BellSouth’s documentation is cumbersome. Bradbury and Norris, at ¶ 43 of their declaration, also incorrectly claim that the Georgia PSC rejected BellSouth’s assertion that it provides CLECs with the resources to “successfully integrate” pre-ordering and ordering functions. These allegations are unfounded because at least four CLECs have already integrated their pre-ordering and ordering functionality with BellSouth’s interfaces, as discussed above, have used the documentation, training, testing, and consultation provided by BellSouth (as described in SVA-3 through SVA-9 to the Joint Affidavit filed February 14, 2002).

111. The facts also belie Bradbury’s and Norris’s complaints at ¶¶ 46-53, 58, footnote 23 of their joint supplemental declaration, and AT&T’s Comments, at 12, footnote 12, regarding AT&T’s inability to successfully integrate using BellSouth’s documentation in spite of their “serious” attempts. BellSouth’s offer of assistance does not equate to a CLECs independent inability to integrate successfully, as inferred by Bradbury and Norris, at ¶¶ 61-62, and AT&T’s Comments, at 12-13, footnote 13. The fact that AT&T has been unable to integrate does not mean that CLECs cannot integrate. As stated above, this claim is clearly refuted by the fact that it has already been done by CLECs with far fewer resources than AT&T.
112. Bradbury and Norris in their Joint Supplemental Declaration, at ¶¶ 45, 50-53, claim that, despite the evidence provided by the Ex Partes filed by the CLECs and the extensive testing on BellSouth’s behalf, BellSouth has not provided parsing “in a manner equal to that which exists in BellSouth’s process.” BellSouth has provided parsing in the manner required by the Georgia PSC and the Commission, as confirmed above.
113. AT&T, in its Supplemental Comments, at 14, and ¶¶ 54-60 of the Joint Supplemental Declaration of Bradbury and Norris, questions the approach used by KPMG to analyze

specific evaluation criteria specific to pre-order to order integration in the testing of the unparsed stream of data. AT&T further states that KPMG did not attempt to parse every field on the LSR. In reality, every field on the LSR is not applicable to a request. The type of request (e.g., Resale, UNE-P, etc.) and activity type (new, conversion, disconnect, etc) determine which fields on the LSR are required, conditional or optional. What is of importance is that KPMG, using their own parsing tool, was able to parse CSR data appropriately to successfully complete several components of the Georgia test (PRE-1, PRE-3, O&P-1, O&P-2, O&P-8, and O&P-9). These tests included a wide range of products offered by BellSouth, as well as all applicable activity types. As usual, AT&T is attempting to complicate a rather straightforward process in order to cast doubt on the results.

**Integration using the Parsed CSR**

114. “Parsing the CSR” is to extract information directly from the CSR in response to a pre-order query and return it in LSOG 4 format. As described above and at ¶¶ 59-88 of the Joint Affidavit of February 14, 2002, BellSouth implemented the functionality that allows BellSouth to parse the CSR on its side of the interface before transmitting it to the CLECs on January 5, 2002, consistent with the requirements of the Georgia PSC. BellSouth released a fully parsed functionality in the TAG pre-ordering interface for testing in the CAVE testing environment on December 8, 2001, as scheduled. On January 5, 2002, as scheduled, BellSouth released this functionality into production. BellSouth now offers the CSR in the parsed format, just as Bell Atlantic/Verizon did when it was approved for long distance in 1999. As discussed above, BellSouth also continues to provide the unparsed stream of data for those CLECs that prefer that option.
115. The Georgia PSC, on page 12 of its Supplemental Comments, reports that BellSouth complied with its 271 Order of October 19, 2001 in Docket 6863-U, by “implement[ing]

the functionality by which the CSR is parsed on BellSouth's side of the interface.

BellSouth implemented this functionality consistent with the requirements of this

Commission's [the Georgia PSC's] *271 Order*, which directed BellSouth to provide

'fully fielded parsed CSRs by January 5, 2002.'" Further,

the [Georgia PSC] finds that the parsed CSR functionality implemented by BellSouth works in the manner intended. BellSouth has produced evidence that three vendors have tested the parsed CSR capability and have verified that the capability functions as specified. Of particular significance is the testing conducted by Telcordia, which tested the integrated pre-ordering and ordering capabilities of TAG in the CAVE test environment, including testing the parsed CSR query. Georgia PSC Supplemental Comments at 11.

116. Parsed CSR was successfully tested by Telcordia and Exceleron, and subsequently by Birch.<sup>19</sup> Reports of these tests were attached as Exhibits SVA-19 through SVA-23, to the Joint Affidavit filed February 14, 2002. BellSouth also engaged another party to test parsed CSR and filed this party's report in an ex parte on February 27, 2002. This report, which is attached as Exhibit WNS-16, described this party's successful test BellSouth's parsing capability. On page 3 of 46 of this report, the third party stated that, based upon its testing, "BellSouth provides sufficient information to enable a CLEC or Vendor to integrate with the TAG interface." It "also determined that the parsed CSR function was operational when accessed via the CAVE TAG API." Exhibit WNS-16 at 3.
117. In ¶¶ 34-39 of their Joint Supplemental Declaration, Bradbury and Norris question the validity of the testing by third parties, including Telcordia and Exceleron. Contrary to AT&T's assertions, the testing by these two vendors was thorough and reliable.
118. Bradbury and Norris, at ¶ 34 of their Joint Supplemental Declaration, claim that the testing of the parsed CSR by Telcordia had a potential for "conflict of interest." This Commission has relied upon Telcordia as an independent third party tester in the Texas,

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<sup>19</sup> BellSouth has an arms-length agreement with Telcordia.

Arkansas, Missouri, Kansas, and Oklahoma cases for this type of testing. Moreover, the Commission found the test viable enough to add “additional assurance” that CLECs could integrate. *Texas Order* ¶ 158. Thus, AT&T’s accusations are unfounded, and should be ignored.

119. In addition to the testing by Exceleron, Telcordia, and the third party, BellSouth and Birch Telecom recently tested the parsed CSR as part of Birch’s test of its upgraded TAG interface. Production Verification Testing of Birch’s Parsed CSR – Pre-Ordering Application was completed successfully on January 21, 2002, pursuant to the TAG Application Test Plan that was executed between BellSouth and Birch Telecom. Production Verification Testing is performed as a final step after all other testing phases have been completed. Attached as Exhibit SVA-22 to the Joint Affidavit filed February 14, 2002, is Birch’s Staged Testcase Specifications for TAG CLEC Application Testing for 7.7.0.1 Parsed CSR – Pre-Order. Birch’s representative successfully pulled parsed CSRs for both residential and business accounts at that time. All test scenarios received “Pass” as a grade, which indicates, per the terms of the contract, that “test cases ...have been executed and both the CLEC and BellSouth have agreed that the success criteria specified in the test plan ha[ve] been met.” Exhibit SVA-22 to the Joint Affidavit of February 14, 2002. Birch’s CSR Test Summary, which indicates that the testing was successful, was attached as Exhibit SVA-23 to the Joint Affidavit filed February 14, 2002.
120. In its Supplemental Comments at pages 25-26, Birch tries to minimize the success of its testing of the parsed CSR with BellSouth. BellSouth is uncertain as to how Birch reconciles its previously positive written documentation and correspondence to BellSouth with its current position. *See* Exhibit WNS-17 and Exhibit SVA-23 to the Joint Affidavit of February 14, 2002. Birch makes much of the fact that only four accounts were tested,

when the facts are, that Birch was offered a long list of scenarios from which to choose, but chose instead to write in that it only wanted to test one 3-5 line business pre-order request for resale (“REQTYPE”) parsed CSR and one 1-2 line residential pre-order resale parsed CSR, as shown on page 17 of Exhibit WNS-18 (Birch’s Electronic Business Survey). BellSouth would have certainly accommodated Birch’s request for further scenarios, had they indicated those choices.

121. AT&T’s and MCI’s comments herein should be weighed against the fact that the Georgia PSC, at 13 of their Supplemental Comments, noted that although “WorldCom and AT&T, both of which have repeatedly emphasized their need for this functionality,” neither of these companies provided any responsive information on this issue when requested by the Georgia PSC in its recent proceedings regarding the parsed CSR. Further, neither AT&T nor MCI have tested the parsing functionality that has been provided by BellSouth.
122. Bradbury and Norris, beginning at ¶ 15 of their Joint Supplemental Declaration, offer conjecture without substantive basis, as to BellSouth’s rationale and success in offering parsing to the CLECs. Contrary to AT&T’s assertions, and as provided in my affidavits of October 2, 2001 and November 13, 2001, BellSouth explained its plans to implement the functionality to parse the CSR on BellSouth’s side of the interface. In the Joint Supplemental Affidavit of William N. Stacy, Alphonso J. Varner and Ken L. Ainsworth of February 14, 2002, BellSouth explained that this commitment had been accomplished.
123. Bradbury and Norris in ¶¶ 27-31 of their Joint Supplemental Declaration complain that BellSouth “simply...chose not to” provide certain fields in the original parsing functionality. They also assert that BellSouth “renege” on its commitment to provide additional fields of data in a parsed format. To the contrary, BellSouth explained clearly to the CLECs what it could and could not parse in LSOG 4 format. CLECs originally

requested that BellSouth parse all 136 data fields on the LSOG 4 CSR. Subsequently, as part of the change management process, BellSouth worked with the CLECs to develop a “CLEC Requested Requirements” document, which contained 106 requested fields.

BellSouth explained to the CLEC community which specific fields that it could parse and provided reasons for those fields that BellSouth could not parse. BellSouth was ultimately able to successfully parse and return 87 of the 106 fields requested by the CLECS. BellSouth’s explanation as to its process and rationale for the provision of the 87 fields as provided in ¶¶ 77-88 of the Joint Affidavit filed on February 14, 2002, and extensively elsewhere herein.

124. On pages 14-15 of its Supplemental Comments, the Georgia PSC addresses AT&T’s complaints about the number of fields that BellSouth parsed. The Georgia PSC notes that BellSouth has parsed 87 of the 106 fields requested by the CLECs as opposed to the 74 parsed by Verizon. *See* Georgia PSC Supplemental Comments at 14. Further, the Georgia PSC comments that:

Of the 11 fields identified by AT&T that BellSouth does not parse, AT&T has presented evidence indicating that, for at least some of these fields, other Bell Operating Companies (“BOCs”) do not provide these fields in parsed format either. *Joint Affidavit of Jay Bradbury & Bernadette Seigler*, Docket 6863-U, at ¶ 8 (Feb. 25, 2002). These include fields TOS (Type of Service), HNTYP (Hunting Type), HTSEQ (Hunting Sequence), SGNL (Signaling), which are not provided in parsed by SBC (formerly Ameritech); and fields LST (Local Service Termination), SGNL (Signaling), TOA (Type of Account), and LNPL (Listed Name Placement), which are not provided in parsed format by Verizon. Only four of the 11 fields, according to AT&T, are provided in parsed format by BOCs other than BellSouth, including NAME (End User Name), DGOUT (DID Digits Out), STYC (Style Code), and BRO (Business/Residence Placement Override). However, according to BellSouth, the relevant information for these four fields may be obtained from other parsed or unparsed fields contained on the CSR. *Affidavit of William Stacy*, Docket 6863-U, at ¶ 47 (February 25, 2002). Georgia PSC Supplemental Comments at 15.

125. The Georgia PSC did not agree with AT&T’s assertions (Bradbury/Norris Supplemental Reply Decl. ¶¶ 27-31), that BellSouth had not provided “fully fielded parsed CSRs,” because it had not provided *all* fields as requested by the CLECs. The Georgia PSC found that:

While there may be certain fields that the CLECs have requested which BellSouth has not provided in a parsed format, there has been no showing that the parsing of these fields is critical to ensuring that ‘a broad range of residential customers are to have a competitive choice for local service,’ which, according to the DOJ, is the standard against which nondiscriminatory access to OSS must be judged. *Evaluation of the United States Department of Justice*, at 10. This is particularly true given that other BOCs do not provide some of the fields in parsed format and that the information for the remaining fields at issue can be obtained elsewhere from the CSR. Georgia PSC Supplemental Comments at 15-16.

**Complaints about Software Defects**

126. MCI/WorldCom, Birch and AT&T have all complained about BellSouth’s implementation, in particular the defects related to the implementation. Lichtenberg of MCI/WorldCom, at ¶¶ 141-141 of her Declaration, Birch, at 26 of their Supplemental Comments, and Bradbury and Norris of AT&T, at ¶¶ 21-31 of their Joint Supplemental Declaration, and, AT&T, at 9, footnote 4 of its Supplemental Comments, complain that the defects were not minor. AT&T declares, “in fact such defects severely impair a CLEC’s ability to use the parsed CSR information.” Bradbury/Norris Supp. Reply Decl. ¶ 21. AT&T’s allegation is nothing but conjecture, as AT&T has chosen not to test parsing with BellSouth. Likewise, MCI stands on equally shaky ground, when Ms. Lichtenberg states that “MCI has not yet tested BellSouth’s parsed CSR capability.” Lichtenberg Decl. ¶ 8. This Commission has found that unsubstantiated CLEC complaints without factual support carry no weight, when it stated, “[m]ere unsupported evidence in opposition will not suffice.” *New York Order* ¶ 50.

127. All of these defects were resolved as of the March 23, 2002 Release. As of February 4, 2002, 16 of the 23 outstanding defects were corrected. There were 7 minor outstanding defects remaining, three related to directory listings, two related to directory delivery, one related to customer code, and one related to Trunk Group USOC. These defects had simple workarounds associated with them and should not have had an impact on any CLEC actually desiring to use this capability, as explained in Exhibit WNS-19. During the CCP meeting to review the user requirements for Releases 10.4 and 10.6, the CLECs requested that BellSouth provide a document that outlines the TAG API versions and the associated defect corrections for the parsed CSR. *See* Exhibit WNS-20. More important, other cooperative CLECs and third parties have already successfully tested parsing of the CSRs, as discussed in detail above.
128. Although these types of software errors may be inconvenient for the CLEC (and therefore were fixed as quickly as possible), they do not prevent a CLEC from testing, or prohibit commercial use of the software. First, the parsed CSR is returned to the CLEC in the following sections:
- Parsed CSRRsp (includes date and time sent and carrier name abbreviation);
  - CSRIdentification (includes account telephone number, account number, and Basic Class of Service or Class of Service, depending on version of TAG utilized);
  - CSRListing (includes End User location, listed name, listed address, yellow page heading, Standard Industrial Classification, and additional listings);
  - CSRDirectory (includes directory delivery address and number of directories), CSRSvcEquip (description of Service and Equipment);



- DIDList (Direct Inward Dialing feature detail information);
- remarksData (includes any remarks retained on the record);
- compActData (completed activity data); and
- CSRErrorMsgList (includes any errors returned in the parsing request).

Within each section, the parsed data is returned followed by a data block that contains the unparsed data associated with the section. The unparsed data block is delivered to the CLECs immediately following the parsed data stream. CLECs can easily extract the information needed for the workarounds from the block of data, as described in Exhibit WNS-19, to test or use the parsed CSR.

129. Second, the parsed CSR is primarily useful in those instances where a CLEC is converting an end user from BellSouth retail to either resale, or the UNE-P. In a large number of these conversions, the CLEC simply switches the end user “as-is” and does not need this type of information from the CSR. If, however, the CLEC wishes to change the directory listing at the time of the conversion, it should be conversing directly with the end user about how he wishes the new listing to appear. The existing listing information, even though parsed with an error, may be used as the starting point to develop the new listing information.
130. The Georgia PSC concluded that it was “not persuaded by AT&T’s claim that BellSouth’s implementation of parsed CSR functionality ‘has not been stable’ because there were certain defects associated with the release.” Georgia PSC Supplemental Comments at 13. Any qualified reviewer of the defects workarounds would reach a similar conclusion. The Georgia PSC also confirmed BellSouth’s position that, “[i]t is not unusual for any computer software release to have defects.” *Id.* The Georgia PSC also noted, at page 14, Footnote 12, that AT&T has complained that the workarounds would burden the CLECs, but that AT&T has not explained how the workarounds would

be burdensome or how often they are encountered. The Georgia PSC “...also finds it significant that no other CLEC has complained to the [Georgia PSC] about these workarounds.” Georgia PSC Supplemental Comments at 14, n. 12. As these defects were corrected on March 23, 2002, this issue is moot.

**Enhancements to the Parsed CSR**

131. As mentioned in Bradbury and Norris’s Joint Supplemental Declaration at ¶ 52, and referred to in ITC^DeltaCom’s remarks in the Florida OSS workshop (attached to the Bradbury/Norris Joint Reply Declaration as Attachment 9), these two CLECs consider Hunting to be a “critical” field for parsing. BellSouth and the Georgia PSC disagree. The Georgia PSC found that there was “no showing that parsing of these fields is critical” to meeting the DOJ’s standard. Georgia PSC Supplemental Comments at 15 (citing the Evaluation of the Department of Justice at 10). They found it to be particularly true “given that other BOCs do not provide some of the fields [Hunting is one of those fields] and that the information for the remaining fields at issue can be obtained elsewhere from the CSR.” Id. at 15-16. Nevertheless, Hunting was one of the fields that CLECs had originally requested to have parsed, and it has been addressed by BellSouth as explained in detail below.
  
132. As discussed above, BellSouth was not able to provide all the fields, requested by the CLECs, in the parsed format – that is, extract information directly from the CSR in response to a pre-order query and return it in LSOG 4 format.<sup>20</sup> As a result, BellSouth continued to investigate ways to translate information from the CSR, which it could then translate into LSOG 4 format and provide to the CLECs. As a result, BellSouth developed a means to translate the hunting fields, as reflected in CR0651, and successfully implemented that functionality in Release 10.4 on March 23, 2002. The

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<sup>20</sup> See the discussion in ¶¶ 80-85 of the Joint Affidavit of February 14, 2002.

User Requirements for Hunting (CR0651), as provided in Release 10.4, are attached as Exhibit WNS-21.

133. BellSouth initiated another change request (CR0652) to address the translation of the additional fields to be delivered to the CLECs in an upcoming release. The CLECs are scheduled to prioritize this change request in its upcoming meeting on March 27, 2002.
134. Bradbury and Norris of AT&T, at ¶ 32 of their joint supplemental declaration, and AT&T's Supplemental Comments at 9, footnote 5, complain that LENS and RoboTAG™ were not included in BellSouth's parsing efforts. First, as LENS is subject to CCP, AT&T's concern could have been properly addressed through the CCP at any time. No change request regarding parsing of CSRs for LENS has been submitted. Second, to BellSouth's knowledge, RoboTAG™ was never included in any discussions leading up to the implementation of the parsing functionality. In addition, no CLEC, including AT&T, proposed including RoboTAG™ in the parsed CSR implementation.

#### **“TN Migration”**

135. As part of its Docket 6863-U, the Georgia PSC recently reviewed BellSouth's implementation of TN migration.<sup>21</sup> The Georgia PSC believes that the DOJ's concern, as expressed at pages 23-25 of its Evaluation of November 6, 2001, about the lack of TN migration has now been resolved by BellSouth's TN migration for UNE-P implemented November 2001. See the Georgia PSC's Supplemental Comments of March 4, 2002, at page 6.
136. MCI/WorldCom apparently agrees. At ¶ 9 of her declaration, Ms. Lichtenberg of MCI/WorldCom acknowledges that BellSouth's TN migration “is working relatively

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<sup>21</sup> Contrary to AT&T's remark in footnote 9 of its Supplemental Comments, the Georgia PSC, in its Order of October 2, 2001, did not order the implementation of TN migration as a condition of its approval. See Order, *Consideration of BellSouth Telecommunications, Inc.'s Entry into InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996, et al.*, GPSC Docket No. 6863-U (Oct. 2, 2001).

effectively,” although MCI/WorldCom still complains about BellSouth’s implementation of TN migration.

137. Ms. Lichtenberg, in ¶ 29, complains about the change BellSouth made on February 2, 2002, to eliminate the check during service order processing that sometimes resulted in the mismatch of service addresses between the Regional Street Address Guide (“RSAG”) and the Customer Records Information System (“CRIS”).<sup>22</sup> She speculates that a mismatch would likely cause more orders to fall out in error in the billing system. As explained in detail in ¶ 3 of the affidavit of BellSouth’s witness, David Scollard, MCI/WorldCom’s concern is hypothetical, and therefore should carry no weight.<sup>23</sup> Furthermore, as BellSouth has described in its previous affidavits (for example, ¶ 198 of my affidavit of October 2, 2001), CLECs are supposed to validate all addresses against the RSAG database as a function of pre-ordering validation.
138. During the Georgia PSC’s review, WorldCom complained to the Georgia PSC about TN migration and the RSAG and CRIS address mismatch.<sup>24</sup> However, WorldCom has not quantified the magnitude of problems associated with database conflicts. Additionally, BellSouth has a process in place to resolve database conflicts as communicated at the November 20, 2001 CCP meeting. Furthermore, WorldCom acknowledged that the removal of the secondary check of the street number on the LSR against the CSR has eliminated the rejections caused by the data mismatch. Consequently, as previously

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<sup>22</sup> See ¶ 28 of the Joint Affidavit filed on February 2, 2002.

<sup>23</sup> Unsubstantiated CLEC complaints without factual support carry no weight. *See New York Order* ¶ 50 (“Mere unsupported evidence in opposition will not suffice.”); *Texas Order* ¶ 50 (same). *See also Kansas/Oklahoma Order* ¶ 117 (“We also find unpersuasive WorldCom’s general speculation that other OSS differences are ‘likely’ to exist.”). And mere anecdotal evidence is not sufficient to defeat a BOC’s showing of compliance. *See, e.g., Texas Order* ¶ 50 (“Although anecdotal evidence may be indicative of systemic failures, isolated incidents may not be sufficient for a commenter to overcome the BOC’s *prima facie* case.”). *See also id.* ¶ 372 (holding that a CLEC’s claim that is “anecdotal and unsupported by any persuasive evidence” does not “warrant a finding of noncompliance of this checklist item”); *Kansas/Oklahoma Order* ¶ 207 (“[W]e find commenters’ anecdotal evidence insufficient to overcome SWBT’s demonstrated compliance.”).

<sup>24</sup> BellSouth, however, has analyzed a sample of MCI/WorldCom’s orders and found that the discrepancies caused by the mismatch appear to be very small - .0035%. *See* BellSouth’s Ex Parte Letter from K Levitz to M. Salas, FCC, November 21, 2002, CC Docket No. 01-277.

explained in ¶¶ 39-58 of the Joint Affidavit of February 14, 2002, this check affected very few orders. The Georgia PSC found that the problem with the TN migration about which WorldCom has complained has been resolved, and that TN migration has been implemented in an adequate manner consistent with the Georgia PSC’s 271 Order. *See* Georgia PSC Supplemental Comments at 9-10 and footnote 8.

139. In ¶ 137 of her Declaration, Ms. Lichtenberg of MCI/WorldCom alleges that BellSouth has rejected a “relatively small number” of orders for an “invalid/missing listing name or type” even though MCI did not specify a listing change on the order. Although it is not a part of the TN migration software as MCI alleges, this is a valid defect in BellSouth’s system software. In fact, MCI has indicated that only 17 such errors were received from mid-January through the end of February. Based on MCI’s LSR volume, BellSouth calculates that this error occurred on approximately \*\*\* percent of MCI/WorldCom’s total orders. Even if this error were related to TN migration, it is hardly grounds for terming the implementation of TN migration “near-disastrous.” That is clearly not the case.<sup>25</sup> Instead this is a minor issue that affects CLECs in the same manner it affects BellSouth.

140. Although MCI never filed a defect notice through the CCP, after reviewing their filings with the Georgia PSC and this Commission, BellSouth began an investigation. The investigation revealed that this error occurs when the end users’ existing listing in BellSouth’s CRIS database contains an error during the processing of a UNE-P migration request. As discussed elsewhere in this affidavit and in my previous affidavits, until March 23, 2002, BellSouth split a UNE-P migration request into two separate orders – a “D” (disconnect) and a “N” (New) order. After March 23, 2002, BellSouth instead began

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<sup>25</sup> Also see Exhibit SVA -61 (confidential version) filed with the Joint Supplemental Affidavit on February 14, 2002. SVA -61 shows the number of CLECs using TN migration to order UNE-P between November 17, 2001 and January 28, 2002. This commercial usage demonstrates that TN migration is working successfully.

using the single “C” (change) order to accomplish the same work. Because BellSouth used an “N” order to create the UNE-P functionality in BellSouth’s systems, all features and services on the end users’ account had to be re-stated by BellSouth when it created the “N” order. The error encountered by MCI/WorldCom occurred when the existing listing information stored in CRIS contained an error. When the “N” service order was created, there was an “invalid/missing listing name or type” error detected by the SOER edits, and an error was generated. This error should be routed to a service representative at the LCSC for handling, because there is no problem with MCI/WorldCom’s request.

141. BellSouth is creating a defect notification to enter this defect into change control, and will schedule the correction. It is important to note three items: (1) That this same error would be received by a BellSouth retail representative trying to process a listing change, because the basic problem is an error in the data base, CRIS, which is also used by BellSouth retail; (2) That this issue may be resolved by the change to a single “C” order for UNE-P migration processing (although BellSouth has not completed testing the effect of single “C” on this type of error); and (3) the CRIS database apparently contains very few such errors based on MCI/WorldCom’s experience.
142. Birch complains in its Supplemental Comments at 24-25, that BellSouth has incorrectly included Birch numbers in its offer of proof that TN migration was successful. Bradbury and Norris, at ¶ 68 of their joint supplemental declaration, also question the validity of BellSouth’s numbers for TN migration. BellSouth stands by its numbers as reflected in Exhibit SVA-61, attached to the Joint Supplemental Affidavit filed February 14, 2002, at ¶ 57. Birch claims that because it continues to populate the end user address on migration LSR, BellSouth does not utilize the TN migration functionality on Birch’s LSRs. AT&T’s complaints are similar. These assertions are incorrect. BellSouth’s

information from SVA-61 was derived by pulling the information for UNE-P LSRs for Activity types V, P, Q and W. The Activity types are defined as follows:

V = conversion as specified

P = conversion as specified: Partial Migration (initial)

Q = conversion as specified: Partial Migration (subsequent)

W = conversion as is

143. These are all UNE-P migration Activity types, and BellSouth uses the TN/Migration logic for all UNE-P migrations whether the CLEC submits full or partial addresses. Thus, contrary to Birch's and AT&T's uninformed claims, its LSRs were all correctly included in BellSouth's information in Exhibit SVA-61.

#### **Other CSR Issues**

144. In ¶ 143 of the Reply Affidavit of William Stacy filed on November 13, 2001, BellSouth discussed the complaints CLECs had with their inability to view the BTN, PSO, and LSF indicators on the CSR when using LENS.<sup>26</sup> As stated in ¶ 143, the BTN defect was fixed with Release 10.0 on September 29, 2001. The PSO Flag was fixed with Release 10.3 on January 5, 2002. The Local Service Freeze ("LSF") indicator was fixed with Release 10.3.1 on February 2, 2002. Furthermore, the LSF indicator was never an issue in Georgia, because it is not a tariffed product there.
145. On page 4 of its comments of March 4, 2002, CompTel complains that competing carriers are unable to view the details of the pending order as BellSouth retail personnel can. The PSO indicator is set whenever there is a pending service order against an account. The PSO indicator is used because the details of a pending order could be from a competing CLEC. Therefore, that information is confidential to the CLEC that placed the pending order. If a CLEC sees a PSO Flag on the CSR, that CLEC can view the details of the

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<sup>26</sup> BTN, PSO, and LSF stand for Billed to Number, Pending Service Order, and Local Service Freeze.

pending order in CSOTS only if that CLEC issued the pending order. Other CLECs' pending orders cannot be viewed.

146. CompTel also complains that CLECs have been unsuccessful in their attempts to obtain pending service order information via the TAG interface. In ¶ 143 of my Reply Affidavit of November 13, 2001, I noted that the PSO indicator is available on the CSRs obtained via TAG interface. After further investigation, BellSouth has determined that the PSO Indicator is not available via the TAG Interface. Change request CR0127 has been opened to implement the PSO Indicator for the TAG Interface.

### **Due Date Calculation**

147. As described in ¶¶ 145-150 of the Joint Affidavit of February 14, 2002, with the implementation of fixes for due date calculation on both February 2 (Release 10.3.1) and February 9 (Release 10.3.2), 2002, the so-called “double FOC” workaround established for a small number of certain types of requests was rendered unnecessary. BellSouth continued running the HITOPS report after those releases and found that 73 LSRs were processed through HITOPS on February 9 (the Saturday of Release 10.3.2), and 151 were processed through HITOPS on February 11 (the following Monday). These LSRs were in the “pipeline” as Release 10.3.2 was being implemented, and had already been designated for the double FOC treatment. Since February 11, the double FOC treatment has not been necessary, nor has it been provided, for any LSRs. In its Supplemental Comments (at 24), Birch Telecom confirms that the fixes for due date calculation errors were effective, and states “Birch can confirm that the ‘Double FOC’ has been resolved for Birch LSRs.”

### **Loop Makeup Information**

148. At pages 8-9 of its Comments, Mpower complains about the accuracy of BellSouth's databases providing loop makeup information, much as it did at page 15 of its Comments



filed in October 2001. At ¶¶ 227-249 of my affidavit of October 2, 2001, and ¶¶ 162-176 of my reply affidavit of November 13, 2001, I described how BellSouth provides CLECs with the same detailed information about the loop that is available to BellSouth.

BellSouth offers CLECs access to the Loop Facilities Assignment and Control System (“LFACS”) via LENS and TAG. Contrary to what Mpower states, BellSouth provides much information about the end user’s facilities via LFACs as described in my previous affidavits. This Commission has recognized that, when searching for loop qualification information, both competing carriers and the incumbent LEC use the LFACS system.

Thus, any inaccuracies in the ILEC’s database are not discriminatory, because they affect the ILEC in the same fashion as competing carriers. *See Kansas/Oklahoma Order* ¶ 126.

In some instances, some of the LMU information may not be listed in the LFACS database. In those instances, if a CLEC should determine that it needs additional information that is not available electronically, it should submit a manual LMU request.

Similarly, for BellSouth to serve its own customers, BellSouth must submit a manual service inquiry to obtain facility information for the requested retail service/product when the data is not available electronically.

## **V. ORDERING AND PROVISIONING**

### **Single “C”**

149. In the Georgia 271 proceeding, the Georgia Public Service Commission ordered BellSouth to implement Single C ordering as part of the BellSouth internal provisioning process for CLEC requests for UNE-P conversions. A more comprehensive explanation of the Single C process has been provided in the previous and current Affidavit of BellSouth's Kenneth Ainsworth, as well as my earlier Affidavit. While unable to meet the prescribed target implementation date of January 4, 2002, BellSouth nonetheless

developed the process, allowed CLEC testing in CAVE (no defects found), and successfully implemented Single C ordering in Release 10.4 on March 23, 2002.

150. As of Friday, March 24, 2002, one carrier had completed testing and two carriers had begun testing the single "C" order functionality in the CAVE environment. The status of their testing is as follows:

- \*\*\* - All 10.4 testing completed - test cases matched expected results. A copy of the test summary is attached as Exhibit WNS-22.
- \*\*\* - Testing delayed due to CLEC vendor problems.
- \*\*\* - Three test cases submitted on March 21 were rejected for the reasons listed below. \*\*\* has indicated that they will investigate and re-submit their test cases. None of reasons for the rejecting these three orders were related to the single C release.
  - (1) PON - \*\*\* - Changes to PIC, LPIC, and FPI (Freeze PIC Indicator) are not valid on a line activity type W (Switch-as-is).
  - (2) PON - \*\*\* - Changes to PIC, and LPIC, are not valid on an account activity type W (Switch-as-is).
  - (3) PON - \*\*\* - A multi-line conversion (2 lines) requires a specific line activity for each line in the account. Line 2 was omitted in this case.

**Broadband/DSL-related issues**

151. Before I respond to the specific issues that Covad raised in its comments, I want to put the larger issue of BellSouth’s responsiveness to the DLECs and specifically COVAD in perspective. During a series of collaborative sessions, BellSouth has created seven different unbundled loop products, each with characteristics specifically tailored to meet the DLECs’ requirements, and each time, after the product has been tested and rolled out, the DLECs “discover” that they need another “different” product.

152. The unbundled loop products BellSouth has created are:
- Unbundled ADSL-compatible loop – A designed loop tailored to support ADSL services – available for electronic ordering and flow-through.
  - Unbundled ISDN-compatible loop – A designed loop tailored to support ISDN services – available for electronic ordering and flow-through.
  - Unbundled Universal Digital Circuit/IDSL loop – a designed loop tailored to support Covad’s IDSL modem over an ISDN-type loop – available for electronic ordering now, with flow-through capability to be added on May 18, 2002.
  - Line Sharing – unbundled access to the high frequency spectrum of an existing BellSouth-provided voice loop capable of support DSL services – available for electronic ordering with flow-through.
  - Line Splitting – unbundled access to the high frequency spectrum of an existing CLEC-provided voice loop capable of support DSL services – available for electronic ordering with flow-through.
  - Unbundled Copper Loop – Designed – A designed, dedicated 2- or 4-Wire UCL/S (Short) or 2- or 4-Wire UCL/L (Long) metallic transmission facility from BellSouth’s Main Distribution Frame (“MDF”) to a customer’s premises (including the NID), exclusive of any intervening equipment such as load coils, repeaters, or Digital Access Main Lines (“DAMLs”), provisioned with test point and a BellSouth provided Design Layout Record (“DLR”) – available for electronic ordering and flow-through.
  - Unbundled Cooper Loop – Non-Designed – a non-designed copper loop similar to the UCL described above but provisioned without either a DLR or a test point – available for manual ordering now, with electronic ordering with flow-through targeted for July 2002.

153. In CC Docket No. 01-277, Covad complained that it needed electronic ordering for UDC/IDSL and line splitting. BellSouth has implemented electronic ordering for these UNEs. Covad apparently has a new list. Now Covad complains that it needs just ONE MORE electronic functionality – the ability to order loop conditioning electronically, which I discuss in detail below.
154. In fact, BellSouth is adding new ordering functionality for the DLECs. BellSouth is continuing to provide additional products and services for the DLECs, focusing on expanding the availability of the wholesale DSL transport services and the unbundled data loop products. The next enhancements will include electronic ordering for various forms of loop conditioning. As these enhancements are rolled out, they will be available, first as manual processes, and then as automated electronic processes. In both cases, however, there are a wide variety of products and services available today that support the basic business cases for providing DSL-like services to a wide range of end users. BellSouth provides these products and services in a nondiscriminatory manner.

#### **Mechanization of UDC/IDSL**

155. Contrary to Covad’s claims, made on page 3 of its Supplemental Comments and in Attachment A, BellSouth did not erroneously state that the change request seeking electronic ordering of the UDC/IDSL loop was not submitted until November 26, 2001. In fact, Covad never submitted an official change request to the CCP. In August 2001, although Covad did send a request populated on a change request form, Covad clearly marked it for handling by the Flow-through Task Force (“FTTF”).<sup>27</sup> This was the first request the FTTF received to be considered for mechanization.
156. At the time Covad submitted its request to the FTTF, the process dictated that, when Change Control received a request marked for the FTTF, it would be handled differently

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<sup>27</sup> FTTF requests can be submitted on a Change Request form, as was the case with this request from Covad, or they can be submitted verbally or via an email request.

than a typical Type 5 CLEC-initiated change request. The process called for Change Control to forward those requests directly to the FTTF for handling, tracking, and implementation, which it did. Then the FTTF, on behalf of the requesting CLEC, submitted a Type 2 Change Request to the CCP after feasibility research. At that point, it was assigned a CCP number for tracking and posted to the Interconnection website. Covad's request was handled in exactly this manner. BellSouth completed its feasibility research and submitted a Type 2 change request to the CCP. On November 26, 2001, the CCP assigned number CR0557/FTTF-01 to it. It is at this point that this request was posted to BellSouth's Interconnection website and was officially "submitted" to Change Control. Between August and November, this request was not "unnoticed" nor was it being ignored; it was appropriately being handled by the FTTF process, as requested by Covad, rather than by the CCP.

157. This process should not be news to Covad. BellSouth explained this to Covad in an e-mail dated December 3, 2001, to Colette Davis of Covad from Change Control (attached as Exhibit WNS-23). Also, BellSouth confirmed that Covad wanted this request handled as a FTTF item, not a standard Change Request. *See* the e-mail dated December 4, 2001, to Colette Davis of Covad from Gary Jones, Manager of the FTTF, attached as Exhibit WNS-24. It is unclear to BellSouth why Covad still insists that it submitted a change request in August, when in fact, it submitted a request for mechanization to the FTTF. The FTTF submitted the change request, as per the process at that time, on November 26, 2001, as BellSouth correctly testified.
158. BellSouth has worked continuously with the CLECs to modify and improve the process by which FTTF requests are being handled and tracked subsequent to this request. In part, because of the length of time it took to status the CLEC on its request, perform the feasibility research and ultimately assign a Change Control number, the FTTF process

was modified, with CLEC input and approval, in early 2002. Today, requests for the FTTF must be submitted on a change request form to Change Control. Change Control immediately forwards the request to the FTTF, where it is assigned a FTTF tracking number and returned to Change Control. At this point, a CCP tracking number is assigned, the request is posted to the Interconnection website, and an email acknowledgement of receipt of the request is returned to the originator. This is handled within the first three business days of submission. The FTTF performs its feasibility analysis and submits business rules to BellSouth's internal Change Review Board. CLEC prioritization of FTTF items is performed. The status of the request is maintained and may be monitored via the website. This new process has eliminated the possibility that any requests would go "unnoticed," although that clearly did not happen to the requests that Covad submitted to the FTTF.

159. BellSouth has gone to great lengths to accommodate the needs of Covad, implementing the electronic ordering capability of this product only a few months from Covad's initial request. The UDC mechanization was prioritized by the CLECs in the FTTF meeting on July 18, 2001, and accepted by CCP on November 26, 2001. Just over two months later, on February 2, 2002, BellSouth implemented functionality that allows CLECs to place orders electronically via all interfaces that will then fall out for manual handling in the LCSC. BellSouth has scheduled for May 2002, a second phase to this process that will provide electronic ordering and full flow-through. Covad still has not taken advantage of the new electronic ordering capability, even though it has been available for over a month.
160. Covad further tries to blame BellSouth for Covad's failure to build its ordering interfaces to support electronic ordering of the UDC, claiming it was "given inadequate notice of its

development.”<sup>28</sup> BellSouth updated the status of CR0557 on December 12, 2001, indicating that the electronic ordering functionality was scheduled for implementation on February 2, 2002 in Release 10.3.1. This information was also conveyed to the CLECs in the daily Change Request Activity Report dated December 14, 2001 (see Exhibit WNS-25). The BellSouth Business Rules for Local Ordering were updated and posted to the web on January 2, 2002, 30 days before the implementation of Release 10.3.1, as specified in the CCP. Additionally, draft user requirements were distributed on December 14, 2001, and a user requirements review meeting was held on December 18, 2001. Updated user requirements were distributed on January 10, 2002, and follow-up user requirements meetings were held on January 15 and January 23, 2002. Final user requirements were distributed on January 24, 2002. Additionally, Carrier Notification Letter SN91082797 was posted to the Interconnection website on January 7, 2002, announcing that the UDC mechanization would be implemented in Release 10.3.1.<sup>29</sup> This information is all documented on BellSouth’s secure Interconnection web site.<sup>30</sup> Based on all of the facts presented above, BellSouth cannot, therefore, understand how Covad could possibly expect the Commission to believe that it was “given inadequate notice of [the mechanized UDC] development.” Covad Supplemental Comments at 4. While BellSouth has under taken to provide mechanized ordering, Covad has chosen not to use it.

**Mechanization of UCL-ND**

161. The UCL-ND product was developed and rolled out in March 2001. As of February 2002, there are now a total of only 295 UCL-ND loops in service region-wide; *only ten* in

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<sup>28</sup> Covad Supplemental Comments at 4.

<sup>29</sup> [http://www.interconnection.bellsouth.com/notifications/carrier/carrier\\_pdf/91082797.pdf](http://www.interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91082797.pdf)

<sup>30</sup> [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_secure/ccp\\_rn\\_ps.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_secure/ccp_rn_ps.html)

Georgia and *only twelve* in Louisiana. This is an increase of only 97 lines since year-end 2001. BellSouth has also analyzed the number of *orders* placed in the past few months.

	Orders Placed								
	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	TOTAL
Alabama	0	0	3	0	0	0	0	6	9
Florida	1	0	3	8	0	0	12	50	74
Georgia	0	0	3	6	0	0	1	0	10
Kentucky	0	0	0	0	0	0	1	4	5
Louisiana	0	0	3	2	0	0	3	5	13
Mississippi	0	16	14	15	20	9	14	20	108
North Carolina	2	0	2	2	0	0	2	27	35
South Carolina	2	0	0	0	0	0	0	0	2
Tennessee	2	0	0	2	1	0	0	2	7
<b>Region</b>	<b>7</b>	<b>16</b>	<b>28</b>	<b>35</b>	<b>21</b>	<b>9</b>	<b>33</b>	<b>114</b>	<b>263</b>

162. When BellSouth considered these figures in conjunction with the fact that the change request was not submitted until November 5, 2001, and has not been prioritized by the FTTF, it is understandable why BellSouth has not yet, in good faith, dedicated resources to the development and implementation of an electronic ordering capability for the UCL-ND product.<sup>31</sup> The change request will be submitted to the CLECs for prioritization at the next scheduled FTTF Prioritization Meeting, which is likely occur in early April 2002, pending the approval of the CCP participants on March 27, 2002.

**Ordering Loop Conditioning**

163. It is true, as Covad stated at page 7 of its Supplemental Comments, that BellSouth does not currently offer electronic ordering of an ADSL-compatible loop or Line Sharing with conditioning. This enhancement previously had been considered in the CCP and it was determined to be not feasible due to the time and cost relative to demand at the time the request was evaluated. As information to assist the Commission in assigning proper

<sup>31</sup> The Flow-Through Task Force, on Covad’s behalf, submitted change request CR0541 to the CCP on November 5, 2001.



- weight to this issue, BellSouth completed a total of 20 xDSL orders requiring loop conditioning for the period July 2001 through January 2002 in Georgia and Louisiana.
164. This request was not “summarily rejected by BellSouth” as Covad claims. Covad Supplemental Comments at 7. Covad stated that it submitted a request to the FTTF requesting a process for pre-authorization for conditioning and seeking mechanized ordering of conditioned loops. This request was submitted on January 17, 2002 (not “last fall” as Covad claimed), and it covers only the pre-authorization for conditioning (not mechanized ordering of conditioned loops).
165. BellSouth also disagrees with Covad’s allegations of widespread inaccurate data in BellSouth’s loop makeup databases. BellSouth’s LFACS database is very accurate, although it certainly is not perfect. LFACS is the same database that is used by BellSouth’s retail operations. Therefore, any inaccuracies affect both the CLECs and BellSouth’s retail operations.
166. Covad’s real issue, however, apparently concerns the need to issue two orders when BellSouth discovers load coils during the provisioning process on a loop ordered by Covad. This concern is being addressed as a project via change request CR0622/FTTF-33, and is currently being reviewed by BellSouth.
167. BellSouth has participated in numerous collaborative sessions recently with Covad to discuss possible solutions to Covad’s requests. Based upon the discussions held during a meeting on February 19, 2002, and the subsequent data provided by Colette Davis of Covad (updated forecast), BellSouth is re-evaluating the business case for mechanizing and the electronic ordering capability options. Another meeting was held on March 7, 2002, in Atlanta between BellSouth’s Product Management Team and Covad to seek Covad’s input in assessing the viability of options for electronic ordering of loops/line

sharing with conditioning. BellSouth looks forward to continuing discussions on this matter with Covad.

**Firm Order Confirmations (“FOCs”) and Rejects**

168. Ms. Lichtenberg of WorldCom, in ¶¶ 10-14 of her declaration, and US LEC and XO Georgia, on pages 37-38 of their Comments, refer to problems related to due date calculations. Specifically, Ms. Lichtenberg discusses a problem related to due dates provided on FOCs associated with supplemental orders. BellSouth submitted Change Request CR0620 via CCP in January 2002 to correct this defect. The defect was corrected in Release 10.4 on March 23, 2002.
169. In ¶ 13 of her declaration, Ms. Lichtenberg refers to the supplemental orders as Supplement 2 (SUP2) and Supplement 3 (SUP3) changes. A supplement is any new iteration of an LSR. The supplement data of 2 and 3 identifies the reason for which the CLEC is issuing the supplement. SUP2 indicates the supplement is issued for a due date only change. SUP3 means the supplement is being issued for reasons other than to cancel the LSR or for a due date only change. For example, a SUP3 could be issued for changes to the LSR, which include a due date change.
170. As background, on January 8, 2002 WorldCom notified BellSouth, via e-mail, of a problem on supplemental orders where the modified due date was not being returned on the FOC. WorldCom provided the BellSouth Account Team and Electronic Control (“EC”) Support with several purchase order numbers (“PONs”) as supporting documentation of the problem. EC Support forwarded the example PONs to LEO support on January 11, 2002 for investigation. BellSouth determined that a LESOG problem caused incorrect due dates for the SUP3 requests. On January 14, 2002, BellSouth informed MCI of the LESOG problem.

171. EC Support forwarded information concerning the defect to CCP on January 15, 2002. On January 17, 2002, CCP sent the defect through the CCP process in order to validate the defect with the appropriate impact level and assigned a Medium (M) level to the request. As a result, CCP opened change request CR0620. The change request initially reflected “LESOG is failing to return the new DD (due date) on FOC for REQTYP J (listings) with a SUP3.” BellSouth sent out a daily activity report that reflected this change request.
172. Upon further investigation, on January 21, 2002, it was determined that the defect could affect any request type (REQTYP) on a SUP3 order, not just those for REQTYP J. EC Support notified CCP on January 24, 2002, and CR0620 was revised to read “LESOG failing to return the new DD on FOC for all REQTYPs for SUP3’s”. The revised change request was re-posted to the web site. CCP notified the CLECs, via e-mail, on March 1, 2002.
173. BellSouth has also performed testing on SUP2 changes. During the test, the system correctly assigned the due date and no problems were found. However, BellSouth’s research revealed that a service representative error caused the due date to be incorrect on the PONs for a SUP2 request that were provided by MCI/WorldCom.
174. BellSouth provided CLECs with an adequate and effective workaround to obtain this due date information. Using this workaround, CLECs could determine the new due date in every case, simply by accessing the CLEC Service Order Tracking System (“CSOTS”) or by referencing the Electronic PON Status Report.
175. With this implementation, LESOG now returns the new due date on the FOC when a CLEC submits a supplemental LSR. In summary, following notification by a CLEC, BellSouth identified a defect, provided an adequate work around processes, and implemented a permanent fix on March 23, 2002. To put this issue in perspective,

BellSouth estimated that this issue impacted approximately 3.7% of all LSRs in February 2002, and as such, had a relatively minor impact in LSR processing.

176. In ¶¶ 17-18 of his affidavit, Mr. McLaughlin of KMC claims that BellSouth's OSS is insufficient because of information that is "missing" from the FOC. BellSouth has resolved this issue. On October 11, 2001, KMC notified BellSouth that the TAG system was not providing Service Order Numbers and/or circuit Ids on the FOCs for LNP orders. BellSouth's Customer Support Manager immediately contacted BellSouth's LNP staff, in an effort to capture examples. The LNP staff was unable to capture examples, so BellSouth performed a test that indicated there was a defect in LESOG, and not with TAG. The LNP staff opened change request CR0556 to address the defect through the Change Control Process. The change request was subsequently scheduled and implemented in Release 10.3 on February 2, 2002. Therefore, BellSouth believes this issue is resolved.
177. KMC, at pages 7-8 of its Supplemental Comments, and Mpower, at page 8 of its Supplemental Comments, complain about BellSouth's practice of providing the FOC before BellSouth checks the availability of facilities ("blind FOCs"). The current process that provides the FOC to a CLEC is the same as BellSouth uses with its own end users when establishing due dates. Except for certain access services and project managed service activations, BellSouth does not check facilities availability before committing to a due date for delivery of service to BellSouth's retail customers.
178. US LEC and XO, on page 36 of their Comments, complain that, "CLECs have been experiencing problems in getting timely FOC and reject notices." While the complaint was not clear as to whether the reference was their mechanized orders, partial mechanized, or non-mechanized service requests, the context of the comments appear to focus on the non-mechanized or manually processed orders.

179. BellSouth believes that the facts reflect a different condition altogether. For instance, the Monthly State Summary of reject interval for both Resale and UNE orders for Georgia in January 2002, reflects that BellSouth exceeded its benchmark for non-mechanized (manually submitted) orders. For resale services, actual reject interval performance experience was in the 98-100% performance range. The benchmark for this category was 85% within 24 hours. Similarly, in the UNE service category, except for six (6) individual orders, BellSouth performed in the range of 96-100%. The easiest way to look globally at the timeliness of FOC and reject notices for USLEC and XO is to look at the Georgia and Louisiana PSC ordered SEEM penalties for FOC timeliness. No SEEMs penalties for either XO or USLEC were generated for 2001, indicating that the timeliness of the FOCs delivered to them fell completely inside the statistical parity tests approved by the Georgia and Louisiana PSCs.
180. BellSouth exceeded its benchmark in Georgia, during January 2002, as well, for FOC timeliness for non-mechanized orders. For example, resale orders exceeded the benchmark of 85% within 36 hours. Actual resale order performance ranged 94-100% for January 2002. UNE orders performed in the 98-100% range, except for the subcategory Local Interoffice Transport (which consisted of 3 UNE orders in the entire month). Again, actual data suggest that FOC timeliness of non-mechanized orders is not a problem. Performance data for partially mechanized and mechanized orders reflect, for most categories, similar results.

### **Ordering of EELs**

181. On page 9 of its Comments (filed in CC Docket No. 02-35), Allegiance states that BellSouth is not in compliance with the Commission's Supplemental Order Clarification<sup>32</sup> concerning the processes of converting special access circuits to unbundled local-

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<sup>32</sup> Supplemental Order Clarification, Implementation of the Local Competition Provisions of the Telecommunications Act of 1966, CC Docket No. 96-98, FCC 00-183, ¶ 30 (rel. June 2, 2000).

transport (“EEL”) combinations without delay. This allegation is without merit and demonstrates Allegiance’s unfamiliarity with the existing process that is in place for use by CLECs. BellSouth provides a process for converting a mass number of Special Access circuits to EELs via a spreadsheet provided by the CLEC. Processes also exist for the ordering of individual EELs via the LSR. In order to expedite the handling of EEL service requests, BellSouth’s Change Control Process has targeted the May 18, 2002 (Release 10.5) as the date to accept the EELs service request electronically in addition to manual processing. BellSouth provides information on ordering EELs in BellSouth’s publication, *Unbundled Dedicated Transport – EELs, CLEC Information Package, Version 8, January 14, 2002*.<sup>33</sup> Therefore, Allegiance’s concern that existing Special Access circuits that qualify as EELs under the Commissions orders will be physically disconnected and replaced with newly ordered UNEs has no merit whatsoever.

**Flow-Through**

182. In ¶ 95 of their Joint Supplemental Declaration, Bradbury and Norris of AT&T erroneously state, “BellSouth’s reported monthly flow-through rate for residential retail orders in October, November and December 2001 was 94 percent or higher. Because that percentage includes service representative input errors, the actual flow through capability of BellSouth’s retail operations is nearly 100 percent.” (internal citations omitted). BellSouth’s reported flow through rates for residential retail orders in October 2001 was 94.00%, and for both November and December 2001 was 94.60%. Those percentages, however, do not include service representative errors, and thus BellSouth’s retail operations flow through is not nearly 100% as AT&T claims.
183. Bradbury and Norris of AT&T, in their Joint Supplemental Declaration at ¶¶ 98-99, assert that BellSouth’s flow-through rates for CLECs have not improved in 2001. This is

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<sup>33</sup> <http://www.interconnection.bellsouth.com/products/html/unes.html>

simply and quite factually wrong. Exhibit WNS-26 depict the fact-based results of flow-through rates, target state PSC-ordered benchmarks rates and aggregate mechanical LSR volumes. In aggregate, BellSouth's flow-through rates have increased from 86% to 87% in the year ended 2001 and another .4% in January 2002. While this may seem to reflect minor progress, it is significant considering the total volume of mechanical LSRs processed has sky-rocketed from 294,160 in January 2001 to 455,479 in January 2002, a 55% increase.<sup>34</sup> This remarkable growth demonstrates the commercial utilization of BellSouth's electronic interfaces and is a testament to BellSouth's ability to handle significant growth in volume while providing increased performance. At the segment level, three of the four have shown strong improvement from January 2001 to January 2002 while the residential segment has remained stable. Since the residential segment comprised 69% of the mechanized LSR volume in January 2001 and 61% in January 2002, it has resulted in a steady aggregate flow through rate even though the business, UNE and LNP segments have improved as noted below.

- LNP: 40.1% to 92.8% – Exceeds Benchmark of 85%
- UNE: 80.9% to 85.5% – Exceeds Benchmark of 85%
- RES: 91.4% to 88.6%
- BUS: 64.9% to 74.6%

This has been accomplished in light of the anticipated demand shift for UNE products in 2001 from resale products. To illustrate this, residential resale and business LSRs submitted electronically in January 2001 totaled 218,426, which comprised 74% of the total LSRs submitted electronically. For January 2002, the total resale LSRs submitted electronically was 289,048, which represented 63% of the total LSRs submitted electronically. The overall volume growth from January 2001 to January 2002 was 32%.

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<sup>34</sup> The total number of LSRs submitted by CLECs for January 2001 (mechanized and manual) was 337,317. For January 2002, it was 488,068. The total number of LSRs submitted in 2001 was 4,140,127.

184. In ¶¶ 8 and 102 of their Joint Supplemental Declaration, Bradbury and Norris of AT&T assert that BellSouth’s manual processing did not improved during 2001. Although the absolute volume of manual processing has increased, the percentage of total manual processing has decreased from January 2001 to January 2002. At the same time, Total LSR volume has risen sharply. This is clearly illustrated in Exhibit WNS-27. Exhibit WNS-27 contains data for LSRs submitted via the electronic interfaces from the published fact-based monthly CLEC flow-through results plus the number of LSRs submitted manually. Exhibit WNS-27 depicts the percent of Total LSR Volume for manual processing inputs: a) Manually Submitted LSRs, b) Planned Manual Fall Out, c) BST Errors and d) CLEC Errors. These monthly values are plotted against the monthly volumes for Total LSRs and Total Mechanical LSRs. The ‘hard-facts’ ruin the assertion of Bradbury and Norris, in ¶ 100 of their joint supplemental declaration, that some form of alternative math changes the underlying Flow-Through results – the facts show sharp increases in Total LSR Volume of 45% (from 337,317 to 488,068) while as a percentage of Total LSR Volume, LSRs requiring manual processing has decreased from 33.2% to 28.5%, a net change of 4.7 on a percentage basis. As can be noted using the comparison date of January 2001 to January 2002 depicted in Exhibit WNS-27, manually submitted LSRs as a percentage of Total LSR Volume decreased significantly. The specific results are as follows:

	Jan 01	Jan 02	Net Change
Monthly Submitted LSRs	12.8%	6.7%	6.1% decrease

185. Further analysis reveals improvement as a percentage of LSRs submitted electronically in Planned Manual Fallout and BST Errors as follows:



	Jan 01	Jan 02	Net Change
Planned Manual Fallout	10.6%	10.1%	0.5% decrease
BST Caused Errors	10.5%	9.3%	1.2% decrease

186. It is interesting to note, the only category that did not show improvement over this time frame is CLEC Caused Errors – errors caused by CLEC input. As a percentage of LSRs submitted electronically, CLEC errors actually increased as noted below:

	Jan 01	Jan 02	Net Change
CLEC Caused Errors	2.2%	4.1%	1.9% increase

187. In ¶¶ 103-105 of their Joint Supplemental Declaration, Bradbury and Norris cite the “enormous burden” manual handling places on the LCSCs. Once again, as Exhibit WNS-27 demonstrates, the percent of manual processing has decreased while there has been a significant increase in Total LSR volume. Some degree of systemic manual processing is unavoidable in the provision of services to the diverse group of CLECs that BellSouth serves. BellSouth’s flow-through performance is high and has remained high in the face of increasing LSR volumes.

188. In ¶¶ 106-108 of their Joint Supplemental Declaration, Bradbury and Norris state that BellSouth has made an apples-to-oranges comparison to other RBOCs’ flow through statistics. On the contrary, BellSouth did make an apples to apples comparison, and BellSouth’s flow through results compare favorably to Verizon’s and SBC’s. Collective PSC Ordered measurement of BellSouth’s performance is depicted in Exhibit WNS-26. Simply put, BellSouth is processing significantly more orders, at higher rates of flow-through for a far more complex set of products and services than ever before.

189. In ¶ 57-61 of her Declaration, Ms. Lichtenberg of MCI/WorldCom complains that BellSouth handles too many orders manually in Georgia and Louisiana, and has not automated certain types of orders, such as those for end users with call forwarding or

voicemail. Birch makes related remarks in its discussion of its flow-through, which appears on pages 15-19 of its Supplemental Comments. Birch complains that its flow-through percentages are in the low to mid seventies.

190. First, let me define the issue. If a particular type of LSR is defined as one that “flows through,” BellSouth’s systems are designed to accept an error-free LSR, and will electronically create a service order in SOCs without human intervention. This is defined in the Service Quality measurements as “% Flowthrough Service Requests”. BellSouth performance at the CLEC aggregate level for UNE products generally ranges between 82 and 85%. Each instance where BellSouth’s systems are designed to electronically create a service order and fail to do so is an instance that lowers this measurement from a desired result of perfection. The Louisiana and Georgia Public Service Commissions have assigned a benchmark of 85% for this metric, recognizing that achievement of “flow-through” evolves over time as BellSouth’s systems evolve, and that 100% flow-through for newer products is simply not achievable.
191. When BellSouth’s systems fail to electronically generate a service order, the LSR, and the associated service order are routed to a service representative in the LCSC. The service representative then corrects the system error, and creates a service order that provides the service originally ordered on the LSR.
192. Let me explain Birch’s situation first. Bellsouth has, and continues to conduct, a collaborative analysis of Birch’s LSR processing experience with BellSouth. These discussion have two primary objectives: (1) to understand the types of service being ordered by Birch, and to define and correct BellSouth system errors that prevent portions of these orders from flowing through; and (2) to similarly define and correct Birch’s ordering errors and improve the rejection rates for Birch’s LSRs. The most recent version of this analysis focused on the orders placed by Birch from November 2001

through January 2002. The findings for both primary section of the study are described in Exhibits WNS-28 (at 8) and WNS-29 (at 14-16). Below, I will describe the findings related to Birch's flow-through rate.

193. BellSouth's analysis of BellSouth's system errors for Birch's LSRs has revealed a pattern that explains why Birch's flow-through rate is lower than the average rate for the CLECs.

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\*\*\* These LSRs

are designed to flow through, and do so in most cases. Because of the complexity of the service order creation process for certain variations, however, not all LSRs which include voice mail can be handled completely electronically by BellSouth's systems. Hence, BellSouth generates a BellSouth system error.

194. BellSouth's analysis of its system errors for Birch's LSRs shows that a Birch has a higher than average percentage of four specific errors. This negatively impacts Birch's flow-through rate by 13–16 percent. The table below compares these how these four errors affected Birch in January 2002, compared with the experience of four other CLECs using UNE-P as a major part of their market strategy.

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195. BellSouth has identified and scheduled system fixes for three of these four errors. These corrections are scheduled for an ENCORE system release (10.5) on May 18, 2002. After BellSouth corrects these three errors, and if Birch's ordering patterns remain the same, BellSouth expects that Birch's flow-through rate should improve significantly. Network Telephone's flow through situation is much the same as Birch. Network Telephone's overall flow through rates are generally lower than the aggregate results because of the high volume and flow through rate attributable to WorldCom. As noted in the chart above, the BellSouth system errors for Network Telephone include the same error code as for Birch, and Network Telephone should, therefore, see similar improvements in its total system fallout and overall flow through rate as a result of the system fixes for these errors. Other CLECs ordering UNE-P will also see improved results, but the difference will be less dramatic, because their market plans call for lower percentage of these types of orders than Birch's does.
196. At ¶¶ 66 of her Declaration, Ms. Lichtenberg claims that if an LSR falls out for a BellSouth error and then a CLEC error is found, the LSR is reclassified as a CLEC error

and not counted as a BellSouth error. Ms. Lichtenberg is again mistaken. When an LSR falls out for an error, a service representative reviews it to determine the cause and appropriate action. If the LSR contains a CLEC error that must be corrected before it's processed, it is clarified back to the CLEC for correction and counted as a CLEC error. If the LSR is complete and correct, indicating a BellSouth error caused the fall out, the representative corrects the LSR and processes it, and the error is counted as a BellSouth error. Additionally, if the CLEC resubmits a complete and correct LSR for the next to correct an error, if the LSR then falls out due to BellSouth's OSS, that version is counted as a BellSouth error.

197. In ¶¶ 58-61 of her Declaration, Ms. Lichtenberg incorrectly assumes that, because MCI/WorldCom's orders fell to manual handling due to call forwarding and Memory Call, BellSouth is attempting to blame the errors on CLECs. To the contrary, the orders fell out initially because of input errors by MCI and were clarified back to MCI. If MCI supplemented the orders with the correct information, the orders fell out for manual handling due to call forwarding and Memory Call (requiring the ZLIG FID be added) and were classified as BellSouth errors. *See* Exhibits WNS-30 and WNS-31. Because CLECs had complained about loss of the features on conversion when the customers wanted to retain the features, BellSouth caused the orders to fall out in order to verify that the call forwarding and Memory Call voice mailboxes were not torn down during provisioning-related activities during the UNE-P migration.
198. Now, the CLECs want the orders to flow through rather than fall out and BellSouth is accommodating that request. On May 18, 2002 with Release 10.5, BellSouth's systems will allow the orders to flow through rather than fall out for manual handling. Since August 2001, MCI has been updated on these activities through discussions on weekly

account team conference calls, as well as the letters noted above in Exhibits WNS-30 and WNS-31.

199. The FTTF, which includes BellSouth and CLECs, has submitted many flow-through improvement features, many of which BellSouth has implemented. Exhibit WNS-32 lists those features which have already been implemented, several that are scheduled for Release 10.5 in May, and others which are pending FTTF prioritization and then scheduling. This exhibit also shows some additional flow-through improvement features that BellSouth initiated to help increase flow-through. BellSouth remains committed to identifying and implementing features that will improve flow-through even further.
200. In ¶¶ 105-117 of their Declaration, Bradbury and Norris of AT&T state that during its Third Party Test in Florida, KPMG continues to find a host of problems allegedly resulting from BellSouth's excessive reliance on manual processing, and thus causing KPMG to generate several exceptions. In ¶ 67 of her Declaration, Ms. Lichtenberg of WorldCom also mentions Florida Exception 86. In Florida Exception 86, KPMG asserted that it did not receive flow-through FOCs for LSRs submitted electronically via the mechanized ordering process. BellSouth disagreed with KPMG's analysis of the PONs, and provided supporting data. Florida Exception 121 focused upon flow-through FOCs for Local Number Portability ("LNP") LSRs submitted electronically via the mechanized ordering process. BellSouth's research confirms that BellSouth exceeded the benchmark published in the SQM. KPMG is currently re-testing this issue. In Florida Exception 122, KPMG asserted that BellSouth did not provide flow-through classification for submitted DSL orders. KPMG is re-testing this issue. In Florida Exception 124, KPMG indicated that it could not replicate the values for "Ordering: percent flow-through service requests (detail) SQM report for the CLEC aggregate. KPMG is currently re-testing this item. For more details, see Exhibit WNS-7.

201. Ms. Lichtenberg also incorrectly claims, in ¶ 67 of her declaration, that “[KPMG’s] results disagreed with the flow through numbers provided by BellSouth for these same orders.” First of all, BellSouth does not provide “flow-through numbers” for KPMG’s LSRs. BellSouth explained the reasons why LSRs KPMG expected to flow through did not. These included LSRs that fell out for planned manual handling which should not be included in the flow-through calculation, and some LSRs for which the cause of their fallout was corrected in a software release on February 2, 2002.
202. On page 13 of its Supplemental Comments, Sprint questions the validity of BellSouth’s data because of “the number of loops that BellSouth identifies as having been ordered by Sprint between September and December, 2001.” Sprint refers to the table that appears after ¶ 30 in the Joint Affidavit that BellSouth filed on February 14, 2002, which shows (in the proprietary version) the number of LSRs submitted by Sprint between September and December. Sprint complains that “[t]he number of loop orders that BellSouth identifies...exceeds by many times the number of loops for which BellSouth is currently billing Sprint.” Sprint Supplemental Comments at 13.
203. Although Sprint does not provide the number of loops for which it is being billed, it is clear to BellSouth that Sprint has confused ordering activity with billed loops. As stated above, the table shows the number of LSRs that Sprint sent to BellSouth. One reason why the number of LSRs might not match a CLEC’s total number of loops is because each LSR can represent an order for one or more loops. Another reason for the difference is that the information in the table is derived from the Flow-Through Report. The number of LSRs shown in the Flow-Through Report is reflective of the CLEC’s overall ordering activity, and might include LSRs that were clarified, superseded, or for other reasons (such as cancellations) may not have resulted in the installation of a billable loop. Sometimes a CLEC might submit multiple versions of an LSR for a service order

before it is successfully generated. Because the number of LSRs that a CLEC submits is likely not the same as the number of loops that BellSouth bills to it, Sprint's argument cannot be used to question the validity of BellSouth's data.

**Order Status Information and Provisioning Notification**

204. In pages 21-23 of its Supplemental Comments of March 4, 2002, Birch complains that BellSouth does not transmit "appropriate jeopardy notifications to Birch and presumably all CLECs." Birch claims that CLECs are placed at a distinct disadvantage in accessing such information that is available to BellSouth's Retail units on a real-time basis and CLECs cannot proactively monitor jeopardy trends or detect discriminatory treatment by BellSouth.
205. I have previously discussed the types of jeopardy notifications, and BellSouth's ability to transmit jeopardy notifications in ¶¶ 366-368 of my affidavit of October 2, 2001 and in ¶¶ 291-293 of my reply affidavit of November 13, 2001. I will summarize this information below.
206. Once an order for a CLEC or a BellSouth customer is pending in SOCS, certain situations can arise that result in a "jeopardy" condition. A jeopardy occurs when the established due date for the order may not or will not be met. There are two types of jeopardies. The first type, "customer-caused" or "end-user-caused," can occur when the end-user customer misses a scheduled installation appointment. The second type, "company-caused" or "service," can occur for a variety of reasons, including the lack of available facilities ("pending facilities" or "PFs"), defective facilities, weather, or unforeseen circumstances affecting technicians' workloads in an area. Service jeopardies do not occur when customers switch their existing telephone service from BellSouth to a CLEC "as is" because this type of order does not involve new facilities or a premise visit by an installation technician.



207. BellSouth transmits electronic notifications for jeopardies and PFs to CLECs through the EDI, TAG, and LENS interfaces. Both have been available through TAG and LENS since their inception. Electronic notification of “customer-caused” jeopardies has been available through EDI since its inception; PFs were added December 19, 1998.
208. Birch appears to miss the distinction between the electronic notification of customer or company status and notification via CSOTS or other methods, such as the PF report. CLECs that use TAG, EDI, or LENS to submit their LSRs electronically receive jeopardy information through those interfaces. CLECs that submit manual service requests receive jeopardy notifications manually (facsimile, telephone) or via the PF Report. Manual jeopardies are discussed in more detail in the Affidavit of Ken Ainsworth of BellSouth filed on October 2, 2001 (App. A, Tab A).
209. In addition to jeopardy information transmitted electronically via TAG, EDI, and LENS, CLECs may find the Pending Facilities (“PF”) Report helpful in identifying, tracking and resolving jeopardy conditions. A full description of these reports may be found in ¶¶ 380-381 of my affidavit of October 2, 2001. Also in ¶¶ 372, 379 of my affidavit filed October 2, 2001, I explained that KPMG, in the third-party test in Georgia, found that BellSouth satisfied the test criteria for EDI and TAG as it related to jeopardy notification and that BellSouth satisfied the test criteria for CSOTS. The Georgia PSC supports BellSouth’s position. On page 108 of its Supplemental Comments filed in October 2001, the Georgia PSC, “concludes that BellSouth is providing jeopardy notices in a manner that provides CLECs a meaningful opportunity to compete.” *See also* KPMG Master Test Plan Final Report, O&P 2-4-5, at V-B-24; O&P 2-3-5, at V-B-17; O&P 1-3-5, at V-A-17; O&P 1-4-5, at V-A-25 (App. F - GA, Tab 76).
210. US LEC and XO, on page 36 of their Comments, complain, “CLECs have been experiencing difficulties in ascertaining the status of their orders.” BellSouth disagrees.

In fact, in addition to the status information provided both electronically and manually, BellSouth provides status information on CLEC orders via a CLEC Service Order Tracking System (“CSOTS”) as well as via Manual and Electronic Purchase Order Number (“PON”) Status Reports on BellSouth’s Web site.<sup>35</sup> Further, on February 2, 2002, BellSouth began the implementation of CLEC Order Tracking (Phase 1a) (“Order Tracker”), in response to change request CR0040. BellSouth released Phase 1b on March 23, 2002. The Order Tracking Web site is updated daily between 6AM and 9PM EST. The Order Tracker web page is available to CLECs at the secure PMAP web site.<sup>36</sup>

211. The Order Tracker provides CLECs with information about their LSRs before they reach the service order processor. The Order Tracker (Phase 1a and 1b) provides CLECs with the following statuses:

- LSR has been received and loaded into BellSouth’s database.
- LSR is being processed by the mechanized service order generator.
- LSR dropped to the LCSC for manual handling.
- LSR claimed by service representative for handling.
- 855 issued<sup>37</sup>
  - Clarification built and returned to/available for the CLEC.
  - Reject built and returned to/available for the CLEC.
  - Jeopardy built and returned to/available for the CLEC.
  - FOC built and returned to/available for the CLEC.
  - Pending Service Order Status changed and returned to/available for the CLEC.
- When the service order is generated.
- 865 issued

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<sup>35</sup> CSOTS and the PON report were discussed in ¶¶ 373-381 of my affidavit of October 2, 2001.

<sup>36</sup> <https://pmap.bellsouth.com/apps/operations/>

<sup>37</sup> 855 and 865 (see below) represent transactions sent by BellSouth to the CLECs via the electronic interfaces.

- Clarification built and returned to/available for the CLEC.
  - Reject built and returned to/available for the CLEC.
  - Jeopardy built and returned to/available for the CLEC.
  - FOC built and returned to/available for the CLEC.
  - Pending Service Order Status changed and returned to/available for the CLEC.
  - Completion Notice returned to/available for the CLEC.
- When an error has been logged against the LSR.
212. Phase 2 will provide the CLECs with the status information, as described above, for LNP and xDSL orders. Phase 2a for xDSL order tracking is targeted for release in May 2002, and Phase 2b for LNP in November 2002.

### **Line Loss Notification**

213. I discussed line loss notification in my affidavits filed in 2001 and in ¶¶ 200-201 of the Joint Affidavit of February 14, 2002.
214. In ¶¶ 45-55 of her Declaration, Ms. Lichtenberg of MCI complains that BellSouth is failing to submit line loss reports for a significant number of customers, resulting in double billing. On March 2, 2002, BellSouth corrected a discrepancy that caused some records not to be transmitted via Network Data Mover (“NDM”). Ms. Lichtenberg uses her data to show that BellSouth provides the correct information 97.7% of the time (assuming her 2.3% calculation at ¶ 51 is correct).
215. Ms. Lichtenberg, in ¶¶ 50-52 of her Declaration, refers to new data references that MCI/WorldCom has not previously shared with BellSouth. However, the correction on March 2, 2002 should prevent these type errors in the future.
216. MCI does have a second resource for any Line Loss notifications at the BellSouth web site.<sup>38</sup> MCI is aware of this web site and has used it to compare the two resources, NDM

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<sup>38</sup> <https://pmap.bellsouth.com>

and the web report, which Ms. Lichtenberg said reflected a 2.3% error rate. In August 2001, BellSouth advised MCI/WorldCom of this web site, yet MCI/WorldCom refused to use it – even when facing what MCI claimed to be “1,285 complaints from customers.” MCI/WorldCom Supplemental Comments at 29. The data on the web report would have assisted MCI in answering or preventing many of those alleged complaints.

217. BellSouth understands the critical nature of this information and has been working cooperatively with MCI/WorldCom since August 2001 to resolve all line loss issues. On February 2, 2002, BellSouth implemented a change to the NDM report so that all Disconnect Reasons (“DCR”) are included. The user requirement document is attached as Exhibit WNS-33. Ms. Lichtenberg requested the change in November 2001. DCR is one of the criteria that causes a line loss record to be reported to MCI/WorldCom. Previously all DCRs were not included on the NDM report, because MCI/WorldCom had not asked that they be included when the report was created in July 1998. The requirements document for 1998 is attached as Exhibit WNS-34. The user requirements for that report were written in conjunction with MCI/WorldCom, and the report is specific to MCI/WorldCom needs. MCI/WorldCom has mischaracterized this report in its previous and current testimony as being incomplete because of some error by BellSouth, when the information was provided just as MCI/WorldCom had requested it. *See* Lichtenberg Decl. ¶ 47.
218. As one more measure of quality, BellSouth will implement program changes that assure that the data provided to MCI/WorldCom via NDM and the data provided on the BellSouth web site are the same. These changes are targeted for implementation by April 2002.
219. In ¶ 52 of her Declaration, Ms. Lichtenberg of MCI/WorldCom refers to Florida Exception 139, which was opened by KPMG because KPMG believes that the line loss

information included on the web site does not include sufficient detail for CLECs to properly identify account activity. BellSouth’s response to this issue is included in Exhibit WNS-7. BellSouth is currently investigating the amended issues.

220. As further evidence that BellSouth is concerned that MCI/WorldCom receives the required data, BellSouth provided MCI/WorldCom with “recovery” data on a weekly basis via NDM. The file, containing records that were not included in daily transmissions for the immediately preceding week, is no longer provided since MCI/WorldCom gets these records as of the February 2, 2002 change. BellSouth also provided MCI/WorldCom with a recovery file for all line loss records from October 1-December 1, 2001. Based on MCI/WorldCom’s request, BellSouth has agreed to provide a file of all line loss records from May 1 through October 1, 2001, as a final verification that all notifications have been sent. This file, which will be sent to MCI/WorldCom on May 7, 2002, will provide records back to the date of MCI/WorldCom’s Georgia local launch.

**Availability and Capacity of the Interfaces**

221. In their comments, CLECs have complained about system outages and availability. I will address each complaint below. However, before discussing the specifics of their allegations, it is important to note that BellSouth’s SQM results, which take into account all outages, even those less than 20 minutes, show that BellSouth is performing very well.<sup>39</sup> In addition, BellSouth’s SQM measures are substantially the same as the interface availability measures that this Commission has seen from Verizon and SBC. BellSouth’s

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<sup>39</sup> Outages from 1 second to 60 seconds are reported as 1 minute in the SQM. In New York, the benchmark was 99.5% of the “prime-time hours” (6am to 12 am), and BellAtlantic consistently met it. *See New York Order* ¶ 155. In Texas, the benchmark was 99.5% availability, and SWBT met it all but one of the last 6 months (when it was 98.5%). *See Texas Order* ¶ 164. In Kansas/Oklahoma, SWBT essentially met the 99.5% benchmark every month (one month was 99.4). *See Kansas/Oklahoma Order* ¶ 134, n.371. In Massachusetts, Verizon’s EDI interface was available 99.88% over a 4-month period. *See Massachusetts Order* ¶ 53, n. 154. In Pennsylvania, the prime time numbers are all over 99%. For the web GUI, the numbers over 5 months were 99.89, 99.14, 99.92, 99.25, and 99.88. For EDI, they were 99.99, 99.82, 99.89, 100, 99.93. *See Pennsylvania Order*, App. B at 4-5.

performance compares very well with the level of performance that these ILECs demonstrated in their successful 271 applications.

222. As I explained in ¶ 338 of my affidavit of October 2, 2001, BellSouth's recent performance on the monthly interface availability measurement has been excellent. The duration of the outages have been steadily decreasing, and, when outages do occur; BellSouth has suitable procedures and processes in place to address outages in a timely and effective manner. In fact, since December 2000, BellSouth has regularly met the Georgia and Louisiana PSCs' performance measure of 99.5% for each of the electronic interfaces: TAG, EDI and LENS.
223. Birch, on page 19 of its Supplemental Comments, states, "In the past, Birch has solicited the assistance of Change Control to perform a root cause/explanation of the reported outage patterns with TAG (Telecommunications Access Gateway), LENS, other applications. BellSouth's response to such inquiries was that such a request does not fall within the responsibilities of CCP."
224. Birch initiated a complaint with BellSouth regarding apparent system outages or slowdowns that occurred in the last 3-5 days of the month. BellSouth and Birch jointly began a technical investigation to determine the cause of the issues, and to resolve them. The primary issue was identified as another CLEC TAG user that had an outdated version of the TAG software. That CLEC was using the security credential software in a way that periodically consumed many more software resources than it would in proper operation. As a result of the investigation, this CLEC was moved to a newer version of the TAG software, and reconfigured to optimize its use of the security credentials. Since this CLEC's software was reconfigured, the problem reported by Birch has not recurred. The last conference call concerning this issue occurred on 3-15-2002 and included Mel

Wagner, Jerry Oliver, and Paul Pinick from Birch, and Kent Hamblen, Alisha Neilson, Gary Romanick, Carol Nelson, and Jay Agnew from BellSouth.

225. While Birch is correct that a root cause of outage patterns is outside the normal scope of CCP, BellSouth never refused to provide Birch a root cause analysis as Birch implies. In fact, after Birch directed the same request to the EC Support Team, BellSouth immediately implemented a system improvement action plan. Birch's action plan commenced on February 19, 2002 and concluded March 15, 2002. As part of the action plan, BellSouth provided Birch dedicated support to help track and resolve the pattern of slowness, loss of functionality and short interval downtime they experienced. As a result, BellSouth has identified and resolved the problem. The problem was identified as a resource constraint problem brought on by a credentials violation by another CLEC. BellSouth provided Birch with an analysis of its findings on March 15, 2002. In Birch's own words it says, "BellSouth's OSS Support Team was extremely responsive and immediately fashioned a 'Systems Improvement Action Plan' for Birch and implemented a study (2/19/-3/15/2002) to document all system incidents." Birch Supplemental Comments at 20.
226. Mpower, on pages 6–8 of its Supplemental Comments, discusses alleged problems that it claims it has experienced with TAG. In ¶¶ 356 and 282 of my affidavits of October 2, 2001 and November 13, 2001 respectively, I discussed the outages that had been posted on the BellSouth CCP website for March-October 2001. Mpower alleges that BellSouth's OSS is inadequate. BellSouth disagrees with Mpower's assertion particularly since CLECs submitted more than 640,000 LSRs via TAG during 2001.
227. Mpower, on page 6 of its Supplemental Comments, alleges that during July 2001, it was unable to submit orders electronically and had to revert to manual ordering. In July 2001, Mpower used version 7.5.0.12 of TAG. At that time, BellSouth had approximately nine

other CLECs on that version that did not experience a similar problem. The only problem that has been identified was a defect with LNP ordering where the LNP order number was not being populated on Mpower's FOCs. AT&T submitted change request CR0402 on May 16, 2001 to correct this defect. The defect was corrected in Release 10.0 on September 29, 2001. A copy of the change request is attached as Exhibit WNS-35.

228. BellSouth provided Mpower a workaround for this defect, which required that Mpower contact its Account Manager to obtain a list of order numbers. Nonetheless, this workaround did not prevent Mpower from ordering electronically.
229. On page 7 of its Supplemental Comments, Mpower states, "Mpower is in the process of having to start over with an entirely new interface -- an EDI interface which BellSouth has subsequently introduced." To the contrary, BellSouth introduced EDI in 1998, several months before TAG was deployed. Mpower is somehow confused in its reference to BellSouth's EDI deployment. Nonetheless, BellSouth believes Mpower's TAG problems were a direct result of Mpower's inability to properly program its side of the interface. The fact is BellSouth went to great lengths in trying to assist Mpower in resolving its difficulties. More often than not, Mpower declined BellSouth's help. For example, BellSouth arranged a conference call with Mpower to address an issue that Mpower raised regarding TAG. In preparing for the conference call, BellSouth arranged to have the TAG and LNP Subject Matter Experts participate in the conference call to provide the support necessary to resolve Mpower's problem. At the last minute Mpower canceled the conference call advising BellSouth it had corrected the problem itself. This, of course, proved not to be the case. Mpower continued to have the same problem weeks after first making the report to BellSouth. This example points out that Mpower failed to accept BellSouth's help in resolving problems quickly. Other examples of Mpower's



lack of programming expertise are documented in BellSouth's EC Support log which is provided in Exhibit WNS-36. The EC Support log reveals that Mpower failed to thoroughly analyze its Tag problems before calling BellSouth. This example highlights the fact that Mpower incorrectly attributed its systems problem to BellSouth when the facts reveal that Mpower caused the problem. What is more revealing is that BellSouth had to initiate calls to Mpower on a number of occasions because Mpower failed to pick up LSR notifications from BellSouth on a regular basis. See Exhibit WNS-37 attached. For this and many other reasons, BellSouth firmly believes Mpower caused the majority of the problems it experienced with TAG as a result of poor programming.

230. On pages 7-8 of its Supplemental Comments, Mpower discusses its migration to EDI. As with any new system migration, Mpower experienced a problem in early 2002 when submitting xDSL LSRs via EDI that required BellSouth's assistance. After contacting EC Support, BellSouth isolated the problem to be an incorrect user ID that Mpower provided to BellSouth. After Mpower provided BellSouth the correct user ID, BellSouth immediately reloaded the correct user ID. In response to BellSouth's quick action, a representative of Mpower stated in an e-mail to BellSouth dated February 7, 2002, "I am pleased to tell you that we received our first data FOC through EDI. Thank you very much for the contribution each of you made to make this happen. Your teamwork and level of commitment made the difference! I look forward to working with each of you in the future." See Exhibit WNS-38. As I stated, BellSouth takes all outages very seriously, and assembles teams to take corrective action to resolve system related problems to minimize impact to our customers.
231. Mpower further claims that TAG has undergone nearly constant change from the time of its implementation because of the unending number of errors and problems with the system. BellSouth does not discount Mpower's assertion relating to constant change, in

- fact, BellSouth agrees. The fact is that the majority of the changes are a direct result of TAG upgrades and enhancements generated by CLEC requests.
232. Mpower goes on to say that because of constant changes, which require programming on the CLEC's part as well, it took more than two years to become even minimally functional. Again, as business rules change and as new functionality is added, TAG requires new coding changes for BellSouth and CLECs, which is the nature of the business. This is the case whether Mpower uses BellSouth's TAG API interface or any other ILEC's.
233. Ms. Seigler of AT&T, in ¶ 17 of her Declaration filed in CC Docket No. 02-35, discusses LENS outages. US LEC and XO, at page 33 of their Comments, also complain about LENS outages. In ¶¶ 337-363 of my affidavit of October 2, 2001 and ¶¶ 278-279 of my November 13, 2001 reply affidavit, I discussed the outages that have been posted on the BellSouth CCP website for January-October 2001. Specifically, Ms. Seigler states that LENS experienced 9 outages during the month of January 2002. BellSouth agrees that there were 9 outages posted to the Change Control Process website for January 2002 and the outages did range from 20 minutes to several hours. However, Ms. Seigler fails to mention that one of the 9 outages (totally 266 minutes) reported by BellSouth was actually attributed to an Internet Service Provider ("ISP"), not a BellSouth LENS problem. Other CLECs using a different ISP experienced no outage. The point here is that even though BellSouth is required to publish the outage data based on guidelines established through the CCP, all outages do not impact all CLECs.
234. Nonetheless, BellSouth meets the Georgia-Louisiana approved performance measures for OSS availability (OSS-2). In fact, during the four-month period October 2001 through January 2002, EDI was available 100% of the time; both TAG and LENS exceeded the monthly benchmark. In addition, the Georgia and Louisiana PSCs approved BellSouth's

record for interface availability. Moreover, the Georgia and Louisiana PSC's endorsement of BellSouth's 271 application reaffirms BellSouth's position that under current standards, BellSouth meets its obligation to provide CLEC's with nondiscriminatory access to its OSS.

235. At pages 28-29 of their Comments, US LEC and XO complain that BellSouth's OSS is not designed to meet current and projected demand. Similarly, in ¶¶ 201-202 of their declaration, Bradbury and Norris refer to the on-going volume test of the Florida third-party test, stating that, "KPMG's volume testing in Florida have not shown that [BellSouth's] OSS have sufficient capability to be operationally ready." What is of importance is that during the Georgia third party test, BellSouth's OSS were tested in an offline environment ("RSIMMS") constructed to parallel and exactly simulate BellSouth's production OSS. The highest level of volumes tested was 43,000 during the peak test. As a part of the Georgia test, KPMG also conducted a capacity volume test of BellSouth's production systems. This test was conducted at a volume of 21,600 LSRs.
236. Since that time, in the daily operating production environment, BellSouth has demonstrated its ability to manage 21,000 LSRs per day. The Florida third party volume test has successfully a peak volume test and passed two normal volume tests at a daily level of 31,651 LSRs, and recently would have passed a peak test of 41,000 LSRs per day except for an acknowledged failure in KPMG's LENS test scripting and processing. KPMG has corrected their LENS scripting issue, and executed another peak volume test, which BellSouth has passed. Other matters related to the Florida third-party test are addressed in Exhibit WNS-7 and Exhibit WNS-8.

## **VI. MAINTENANCE AND REPAIR**

237. On page 16 of Mpower's Supplemental Comments of March 4, 2002, Mpower complains that BellSouth lacks an automated or electronic trouble reporting system for SL1 UNE

Loops. Mpower is mistaken. For maintenance and repair, BellSouth provides the Trouble Analysis Facilitation Interface (“TAFI”) and the Electronic Communications Trouble Administration (“ECTA”), both of which I described in detail in my affidavits filed on October 2, 2001, and November 13, 2001. TAFI is the same interface for maintenance and repair that BellSouth’s own retail representatives use to handle a trouble report for basic local exchange service. It is a human-to-machine interface with the intelligence to do diagnostics and provides rapid, consistent and efficient automated trouble receipt, screening and problem resolution. Since its introduction in May of 1997, CLECs have had exactly the same functionality as the TAFI residential interface, or the TAFI business interface, used by BellSouth retail units. CLECs have the ability to electronically enter their own trouble reports on SL1 Loops using the TAFI interface. This ability was added in a TAFI release in late July 2001. CLECs using TAFI have on-line access to the “User Notes”, located in the TAFI Help Screen (F1), which describes this functionality.

238. This concludes my affidavit.