

# **EXHIBIT LCSC-30**

**Flint Memo**

**Bradbury, J M (Jay) - LGA**

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**From:** jrwilliamson@att.com  
**Sent:** Monday, November 06, 2000 12:58 PM  
**To:** mlacy@att.com; baeigler@att.com; gpterry@att.com; eppsteiner@att.com;  
sheronnorris@att.com; bradbury@att.com; bobik@att.com; drainig@att.com;  
deberger@att.com; walarra@att.com; dobeck@broadband.att.com;  
smorrow@broadband.att.com; waldbade@att.com; campbekj@att.com; crcannon@att.com  
**Subject:** FW: LCSC backlog

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

**From:** Jan.Flint@bridge.bellsouth.com  
[mailto:Jan.Flint@bridge.bellsouth.com]  
**Sent:** Friday, November 03, 2000 3:27 PM  
**To:** Williamson, Jill R, NCAM  
**Cc:** Jan.Burriss1@bridge.bellsouth.com;  
Sandra.Jones5@bridge.bellsouth.com  
**Subject:** LCSC backlog

Jill,

I wrote this on Monday and thought I sent it to you but I just found it in my out box -- sorry.

I talked to Ron Moore today about the FOC backlog that AT&T has experienced in the last two weeks.

Ron attributed the MediaOne fall-out and backlog to a directory listings problem in our LEO system. There was also a problem with inappropriate usage of commas in MediaOne's LSRs that caused additional orders to fall-out for manual handling. The LCSC could not easily handle the large number of orders that required manual handling.

This past week, order volume overwhelmed the center. After working this past Saturday, Ron feels that by close of business today they will have recovered and will be current on their pending LSRs.

To address the order volume issues, the LCSC will add 20 service reps to its staff on November 13th and will add another 20 in December.

I hope this information minimizes AT&T's concerns on recent FOC cycle-time.

Thanks,

Jan

# **EXHIBIT LCSC-32**

**Fleming Island LCSC Orders Processed**

<b>Fleming Island LCSC Orders Processed</b>				
<b>Order Type</b>	<b>April</b>	<b>May</b>	<b>June Thru 6/10</b>	<b>Total</b>
Loops	927	741	1	1,669
Loop & Port	444	625	0	1,069
Number Ports	103	145	5	253
LCSC Retail	15	28	4	47
Resale	1,574	1885	514	3,973
Ports	4	10	2	16
Directory	1,892	2707	288	4,887
Combos	494	547	152	1,193
DID Resale	1	3	0	4
<b>Total</b>	<b>5,454</b>	<b>6,691</b>	<b>966</b>	<b>13,111</b>

# **EXHIBIT LCSC-33**

**Ainsworth Letter**



Denise C. Berger  
 Area Manager  
 2000 Supreme Management

1000 Peachtree Street, NE  
 12th Floor  
 Atlanta, GA 30309  
 404 810-3040  
 FAX 404 810-0177  
 PAGER 300 258-0000 PIN 05481558  
 EMAIL dbergrkc@aatt.com

May 25, 2001

Ken Ainsworth  
 BellSouth Telecommunications  
 675 West Peachtree Street  
 Room 27A80  
 Atlanta, Georgia 30374

RE: UNE Platform Provisioning Problems

Dear Ken:

Thanks again for lunch last week. I enjoyed the conversation and share your interest in making the operational processes between our two companies work more effectively and efficiently. During our conversation, I mentioned problems that AT&T was having with UNE Platform orders. Following are the details on the problems we are having.

1. **BellSouth's use of a "D" and "N" order to provision UNE-P orders is not effective in migrating customers from BellSouth to AT&T.** Although BellSouth informed the CLEC community during the Louisiana Workshops that a fix was implemented on April 6, 2001, the orders are not relating and the fix has quite obviously not worked. AT&T has several examples of customers' whose service translations have been disconnected when BellSouth works the "D" order, while it fails to work the related "N" order. Attachment I will outline the specific information relevant to those customers experiencing a problem. The problem, however, is not unique to AT&T. It is my understanding that Birch Telecom has experienced a similar problem at least 40 times and has presented this information to BellSouth through the user's group process. At the last UNE-P User Group meeting, BellSouth, after much discussion by the CLECs, admitted to a problem with the April solution. Apparently, BellSouth has pulled together a task team to address the issue by generating a "C(hange)" order. However, estimated delivery of this solution was End-of-Year 2001. This is not an acceptable timeframe for a solution.
2. **BellSouth's linkage between its Provisioning center and processes and its Maintenance center and processes is not effective for UNE-P customers.** When AT&T has received calls from these customers experiencing problems, our Maintenance Center attempts to refer this to the BellSouth Maintenance

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Center, since these are post-provisioning problems. The BellSouth Maintenance Center personnel are not seeing the migrated customer record and consequently not taking the maintenance ticket. In one instance, an AT&T UNE-P customer, Dunkin Donuts/Baskin Robbins, lost dial tone on Saturday, May 5, 2001. Dial tone was not restored to this customer until Tuesday, May 8, 2001. Attachment 2 to this letter details the difficulty that AT&T experienced relative to this customer's service problem. AT&T received a completion notice on our order. However, it appears that BellSouth only worked the "D" order. I have several questions on this situation, which would apply to all similar UNE-P maintenance issues.

- If the original AT&T due date was May 1, 2001, and AT&T received a completion notice from BellSouth on May 2, 2001, why did the customer not lose service until May 5, 2001?
- Is it the practice of BellSouth to send the completion notice out before all orders are completed within the BellSouth systems?
- On May 5, 2001, at 20:20, Al at BellSouth said that the porting order was cancelled. UNE-P does not port numbers. Was Al perhaps referring to the "N" order?
- Why did BellSouth not handle this as a maintenance issue? The customer was out of service three days. There appears to be nothing that AT&T nor the customer could have done to prevent the out of service condition.
- It was quickly apparent to the BellSouth personnel involved that the problem was caused by BellSouth's failure to process the "N" order. Why was the burden on AT&T to call around to find someone to help solve the problem? Why didn't one of the BellSouth representatives "own" the problem and insure that AT&T got to the right place for resolution? It seems that we lost a vast amount of time due to bouncing around within BellSouth trying to find an organization that could resolve the issue.
- We have many instances of customers who report "No Dial Tone" problems to AT&T after the conversion of their service. Once BellSouth dispatches a service technician, the problem disappears. Since the conversion to UNE-P is, for all intents and purposes, a records order change, why does the customer lose dial tone? What is the technician dispatched to do?
- Are UNE-P customers, who were on IDLC facilities prior to their conversion to AT&T, left on the existing facilities or are they changed to universal or copper facilities before the conversion?

As AT&T's volume of UNE-P orders increases, the number of problems experienced will increase as well, which will have significant impact to our customers and to our brand. I would like to understand BellSouth's action plan and timeline for delivering a remedy to the order relationship issue. I would also like to know what BellSouth plans to implement to treat these types of problems as maintenance problems, with the associated 24-hour resolution, instead of a three-day or more new order problem.

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**Ironically, the customer's perception is that the problem must be caused by AT&T, since they did not have similar difficulties when they were provided local service by BellSouth. Because of this perception, they are many times inclined to switch back to BellSouth, where the cause of the problem lies. I will appreciate your response no later than Friday, June 1, 2001.**

Sincerely,



cc: Greg Terry  
Jan Burriess



*Attachment 1*

**UNE-P ORDERS WITH  
ASSOCIATED TROUBLE TICKETS**

The following PONs are examples of AT&T's experience in BellSouth's ineffective use of a "D" and "N":

<b>AT&amp;T Order Number</b>	<b>Associated BellSouth Order Number</b>
ATLY0101093	N08BDXV8
ATLY0101866	N02NLJT0
ATLY0101693	N00D34P4
ATLY0101796	N07PVVY7
ATLY0101457	N028RTX4
ATLY0101438	N07Q68B5
ATLY0101927	N01GYFF1
ATLY0101442	N0FYTP11
ATLY0101490	N06MPX94
ATLY0101157	N0CT3VR0
ATLY0101260	N00LRNQ7
ATLY0101297	N0GI8T01

## Attachment 2

## DUNKIN DONUTS/BASKIN ROBBINS UNE-P TROUBLE TICKET LOG NOTES

NO.	DATE AND TIME	DETAILS
1.	5/5/01 19:58	Ticket created; customer has no dialtone on 561 482-6602, UNE-P connectivity; customer turned up on May 3, 2001
2.	5/5/01 19:58	Ticket saved
3.	5/5/01 19:59	Ticket picked up
4.	5/5/01 20:20	Called BellSouth at 888 461 0612, spoke with AJ and he said that the order that was porting the customer to AT&T was cancelled. He gave me order #NR8D54T4. He said that he could not tell when that order was cancelled. He said that he has limited systems to check on the order.
5.	5/5/01 20:24	Unable to refer the trouble to BellSouth. Need the port over order #. I have to talk to MACD or Provisioning on Monday to get the order #.
6.	5/6/01 07:27	Customer wants his service up and working now! I called BellSouth and spoke with Renee at 888 461 0612. She says the system she needs to check our orders is down today but she does see a disconnect of the customer's line on 5/3/01, with no new reconnect. Customer just needs his service working. Will try to get him reconnected through BellSouth. Called BellSouth repair and spoke with Debbie and she said if customer wants back in service with BellSouth he will have to wait until Monday. No provisioning managers on call or available to assist him. The only other thing I can do today is page BellSouth's duty manager at 800 946 4646, PIN #1403974. Will wait and see if they call back before I call the customer.
7.	5/6/01 07:44	Erica Pearson, the weekend duty supervisor, returned call. Said there is nothing they can do until Monday, but she will personally call the provisioning folks and try to get this handled for me. She gave me her direct line # 404 541 4009 to call her on Monday so she can get the right people involved to fix the situation.
8.	5/6/01 7:48	Called customer and explained Monday AM is earliest can get anyone to work with me on this. He accepted that, but still is not happy. I advised we would call him back with update Monday after speaking with BellSouth.
9.	5/7/01 08:31	Called customer's number. Reaching RNA. Called Erica Pearson @ 404 541 4009. She said she would call me right back. Waiting on her callback.
10.	5/7/01 09:52	Erica has not called back, so starting over. Called BellSouth Non-Design Maintenance at 888 461 0612.

Attachment 2

DUNKIN DONUTS/BASKIN ROBBINS  
UNE-P TROUBLE TICKET LOG NOTES

		Spoke with someone who said records show the "D" order on 5/3/01 and a pending "N" order #NR5FP5W3 to reconnect to AT&T resale, but shows pending in the system. She said to expedite I should call the LCSC. Calling LCSC @ 800 871 4404 and spoke with Catherine. She couldn't locate the order. I gave her our PON and the phone number. She will research and call me back.
11.	5/7/01 09:52	Sharrie calling back from BellSouth with status. Erica called me back. I advised what Non-Design Maintenance said and she advised that she is going to get a Non-Design Maintenance Manager involved in this right away.
12.	5/7/01 09:58	Catherine with the LCSC called. She has been unable to locate any information on this and has forwarded all of the info to the original rep who input the order. She will call me back when she hears something.
13.	5/7/01 10:03	Received callback from Sheree, a manager in Non-Design Maintenance. She has me on hold and is checking into this now. Sheree came back and said she does see the order # still pending in the system and it was never worked. She is putting in a ticket and sending it to a technician at RCMAC to get it worked. She will have tech call me back with status and ticket #.
14.	5/7/01 10:06	Catherine and Steven called from Non-Design Provisioning. I advised what Sheree was doing and they advised they wouldn't handle this anyway so they will let her take care of this.
15.	5/7/01 10:17	Sheree with BellSouth calling back and said the service order needs a new due date. They can't open a new ticket because service order is past due. Order NR5FP5W3, original due date 050101. Said for me to call LCSC.
16.	5/7/01 10:18	Called 800 872 3116 for BellSouth LCSC
17.	5/7/01 10:30	Customer called to request status. Advised he was completely out of service and ask that I escalate.
18.	5/7/01 11:09	Called LCSC at 800 872 3116 and spoke with Alicia. Was on hold for a while, then someone else came online. I must have been transferred. Now speaking with Mary. She found the order but has to transfer me back to someone else. Mary says I need to speak with someone in the UNE Combo for small business group. She transferred me to someone who said she can't talk to CLECs and we are supposed to speak with managers, not them. She said to call back in and speak with someone

Attachment 2

**DUNKIN DONUTS/BASKIN ROBBINS  
UNE-P TROUBLE TICKET LOG NOTES**

		else. I am trying first level escalation contact listed in KMS, Dan Haley @ 404-532-2072. Only reached his voice mail. I will go back and try this one more time. Called the number listed in KMS for LCSC at 800 871-4404. That is the ACAC center and they cannot help either and didn't know where to send me. I am now trying the 2 <sup>nd</sup> level, Linda Stewart per KMS at 404 532-2118. Her voice mail directs me for order related issues to contact either Elaine at 404 532-2260 or 404 532 2114. Called 404 532 2260 and spoke with someone who handles only AT&T circuits, not POTS lines. Tried 2 <sup>nd</sup> level Reginald Glover 770 493-3471. He also only handled special AT&T circuits and couldn't assist me.
19.	5/7/01 11:38	Called 800 872 3116 and spoke with Terry who put me on hold for a long time. Then the line disconnected.
20.	5/7/01 13:22	Called Orlando provisioning center to get help with this customer order.
21.	5/7/01 16:33	This is being handled by the UNE-P BellSouth resale group. Venice is working it and will escalate to the night manager if not cleared before she leaves at 8:00 PM tonight.
22.	5/8/01 06:30	Received a call from AT&T Provisioning giving me a status. There is a ticket on this and a tech is being dispatched out this morning around 8:30. He will call back with status.
23.	5/8/01 10:25	Received a call from AT&T Provisioning. They have tested the line and it appears to be working.
24.	5/8/01 12:09	Called customer. Confirmed the number has been working since this morning and all is OK.

# **EXHIBIT LCSC-34**

**Berger Letter**

June 5, 2001

Ms. Denise Berger  
AT&T  
1200 Peachtree Street  
12<sup>th</sup> Floor  
Atlanta, Georgia 30039

Re: UNE Platform Provisioning Problems

Dear Denise:

This is in response to your letter dated May 25, 2001, regarding Unbundled Network Element-Platform (UNE-P) issues.

I am very interested in the UNE-P orders AT&T provided as examples of migration problems. As you are aware, the list of UNE-P Purchase Order Numbers (PONs) submitted with your letter will be thoroughly investigated by BellSouth's account team. You may also be contacted by the account team for additional information. The results of the analysis will be communicated to both you and me at the conclusion of this effort.

Additionally, the following is presently my understanding of AT&T's remaining issues in your correspondence:

**1. BellSouth's use of a D and N Order.**

First, BellSouth is confident that its processes supporting UNE-P conversion provide for a seamless transfer of service from BellSouth to any CLEC. As with every new experience there are always opportunities for enhancements and refinements. Since the passage of the Act, BellSouth has aggressively pursued appropriate enhancements and refinements

Your letter referred to a fix that was announced in the Louisiana Workshop to correct a service order relationship problem with D and N orders. Your letter further states that the fix obviously has not corrected the problem as your end users were continuing to experience conversion problems.

Two issues have been brought to my attention related to this process. One is associated with voicemail, which AT&T indicated was not an issue; and the other issue concerns the examples provided in your correspondence. The fix on April 6, 2001 was related to MemoryCall<sup>®</sup> mailbox identification. An edit was implemented on April 6, 2001 requiring a Do Not Tear Down (DNTD) Field Identifier (FID) to be added to the N Order as well as the D Order to prevent the mailboxes from being disconnected during the conversion. I am not aware that BellSouth has received any further complaints concerning this problem since implementation.

The second issue will be addressed after the examples have been analyzed. I am also requesting that the account team obtain information from the UNE-P team for any additional issues discussed. Also, I have not had any discussions or interface

Ms. Denise Berger  
June 19, 2001  
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with any other CLEC on UNE-P issues. Therefore, I cannot respond to other CLEC UNE-P issues.

**2. BellSouth's linkage between its provisioning center and processes and maintenance center and processes.**

BellSouth has processes in place, as well as necessary tools, to accurately resolve any maintenance issues, which could arise as a result of recently, completed UNE-P activities. The single incident that you mentioned was the result of a technician in the Customer Wholesale Interconnection Network Services (CWINS) Center simply not following documented procedures. I have discussed this scenario with the CWINS Operations Vice President, Jim Argo, and have been assured that appropriate action has been taken by BellSouth to correct this problem. Jim would like you to refer any future maintenance issue directly to him for immediate resolution.

I trust this information and the additional information forthcoming will provide answers to your concerns. BellSouth stands committed to providing you and all CLECs with predictable, reliable service to help you achieve your goals and serve your customers.

I will also be providing to you in separate correspondence what I believe will be a final proposal for the "Hot Cut" Timeliness measure.

I enjoyed lunch and appreciate the opportunity this meeting afforded us to have constructive dialog on issues of interest to both of our companies. I look forward to continuing dialog as BellSouth and AT&T both move through an ever-changing telecommunications environment.

Sincerely,

Ken Ainsworth

cc: Jan Burriss