AFFIDAVIT

STATE OF GEORGIA

COUNTY OF FULTON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ken L. Ainsworth, BellSouth Telecommunications, Inc., being by me first duly sworn deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in "Investigation Concerning the Propriety of InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996," KY PSC Case No. 2001-105, and if present before the Commission and duly sworn, his testimony would be set forth in the annexed transcript consisting of 29 pages and 6 exhibit(s).

Ken L. Ainsworth

SWORN TO AND SUBSCRIBED BEFORE ME this
25th day of July, 2001.

NOTARY PUBLIC

MICHEALE F. HOLCOMB
Notary Public, Douglas County, Georgia
My Commission Expires November 3, 2001

REDACTED VERSION

BEFORE THE COMMONWEALTH OF KENTUCKY

PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY OF KEN L. AINSWORTH

ON BEHALF OF

BELLSOUTH TELECOMMUNICATIONS, INC.

CASE NO. 2001-105

JULY 30, 2001

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is Ken L. Ainsworth. My business address is 675 W. Peachtree Street, Atlanta, Georgia 30305. I am a Director - Interconnection Operations for BellSouth. I have served in my present position since December 1997.

Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

A. Yes. I have previously filed direct testimony in this proceeding on May 18, 2001.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

A. The purpose of my rebuttal testimony is to respond to the testimony and affidavits filed by various parties in response to BellSouth's May 18, 2001 filing.

Q. PLEASE RESPOND TO AT&T TESTIMONY DEALING WITH REASSIGNMENT OF TELEPHONE NUMBERS.

A. Ms. Denise Berger of AT&T (pages 37-39) and Mr. John Coleman of AT&T (page 14) allege that BellSouth has a chronic number reassignment problem. BellSouth has previously identified two issues that caused a problem with duplicate assignment of ported telephone numbers. The first issue was identified in 1999. BellSouth determined that when orders were issued without a certain field identifier ("FID"), the number would not indicate a ported designation in BellSouth's number assignment database. This could allow for a number reassignment. In December of 1999, BellSouth implemented an edit in the order negotiations systems, to ensure that the appropriate FIDs were included on the ported out order, thus, preventing the erroneous duplication of number assignments. At the same time, a review of BellSouth's embedded base of telephone numbers was conducted to ensure errors that may have occurred prior to the implementation of the edit were corrected.

The second issue surfaced in the last quarter of 2000. Reports of telephone numbers being reassigned again surfaced. After researching the problem, BellSouth determined that due to a software upgrade that a ported block of DID numbers would only mark the lead number as ported in the number database. A software solution currently is being pursued to resolve this issue. BellSouth implemented an interim manual solution in January 2001 to correct this problem. The manual workarounds will continue to ensure

all future port out activity will be properly marked in BellSouth's number assignment database to prevent duplicate assignment of numbers.

Additionally, BellSouth began working with AT&T and all Competitive Local Exchange Carriers ("CLECs") to verify all numbers that had been ported since January 2000. A manual verification and correction, if necessary, was performed on all numbers affected by this issue. The review and correction for AT&T was completed on May 23, 2001. In summary, BellSouth expects that these problems have been corrected for AT&T and should not recur.

Q. PLEASE EXPLAIN THE PROBLEMS AT&T CUSTOMERS HAVE REGARDING DUPLICATE BILLING.

A. On pages 39-40 of Ms. Berger's testimony and pages 13-14 of Mr. Coleman's they raise issues dealing with duplicate billing of AT&T customers after they have switched local providers. Duplicate billing does, on occasion, occur. However, the source of the problem can be caused by the CLECs or by BellSouth. For example, Ms. Berger failed to mention that there could be duplicate billing for disconnects processed during a current billing period, where the CLEC does not transfer all of the end user services or in situations where the CLEC does not properly complete the porting of all telephone numbers associated with their Local Service Request ("LSR"). The issuance of a final bill will be a duplicate that is necessary to close the account from BellSouth's records. If the CLEC does not transfer all of the end-users' services then BellSouth will continue to bill for the remaining services provided by BellSouth and duplicate billing will occur. The improper number porting by the CLEC will not allow the order to be

processed and billing will continue until the porting discrepancy is resolved. Therefore, Ms. Berger's implication that duplicate billing is always a BellSouth problem is unfounded.

BellSouth has worked within the various collaboratives to investigate and resolve, where necessary, these types of issues.

Where duplicate billing issues do occur the proper process is for the CLEC to contact the Billing Resolution Group who will investigate any individual issues and work with the CLEC to resolve in an expeditious manner.

Q. ON PAGES 15 AND 16 OF MR. COLEMAN'S (AT&T) TESTIMONY, HE REFERS TO A COMPLAINT FILED WITH THIS COMMISSION ON JUNE 14. WOULD YOU ADDRESS THIS?

A. Yes. BellSouth recently uncovered a problem with over 300 telephone numbers in Kentucky that AT&T had ported. Upon investigation, BellSouth found that AT&T had sent Local Service Requests (LSRs) to BellSouth using a Company Code that was valid for AT&T in Kentucky. However when AT&T submitted the Create SV messages to the Number Portability Administration Control (NPAC), they used a different Company Code that was not valid for use by AT&T with BellSouth in Kentucky. AT&T further submitted Activate SV messages to complete the ports despite receiving a conflict message from NPAC. The use of the incorrect code by AT&T prevented BellSouth from recognizing that the numbers had been ported. The residential end users in these cases were able to receive calls because BellSouth had applied triggers to these lines when the LSRs were submitted. However, billing would have continued to the end user on the BellSouth lines since BellSouth had not received a valid message indicating that the numbers had been ported. Because of this, disconnect orders for these customers had not been issued. When BellSouth determined the cause of the problem, AT&T was notified

that their use of the incorrect Company Code had caused the double billing to their customers. BellSouth also notified AT&T that they would have to resolve the conflict of Company Codes in NPAC to match the code that had originally been submitted on the LSRs. Despite this notification, AT&T continued to use the incorrect Company Code for one week after BellSouth had advised them that this was the cause of the problem. The LSRs for a large portion of these end users were more than 30 days old which would require AT&T to resubmit them in order to get the disconnect orders issued. However, BellSouth advised AT&T that if they would provide written authorization and a list of the numbers, BellSouth would issue the disconnect orders for these end user accounts without AT&T having to resubmit the LSRs. Further, BellSouth advised AT&T that they would stop the billing effective with the date that the numbers were originally ported by AT&T. BellSouth did not want to make the end users suffer for AT&T's mistakes. BellSouth does intend to submit a bill to AT&T for the time between the original port date and the date that AT&T corrected the Company Code in NPAC. In spite of the fact that AT&T's errors were the cause of these problems and in spite of the fact that BellSouth will stop the billing for the end users effective with the original port date, AT&T continues to try to place the blame for this problem on BellSouth.

Q. PLEASE ADDRESS THE ISSUE OF DELAYS IN PROVIDING SERVICE ALLEGED BY MR.COLEMAN (PAGES 16-18).

A. BellSouth is scheduling Saturday due dates for AT&T. In Mr. Coleman's own testimony on page 17, he states that AT&T received FOCs for a Saturday due date of June 9, 2001. Mr. Coleman did not provide any other documentation to support that this is an issue.

Q. CAN YOU RESPOND TO MR. COLEMAN'S COMMENTS CONCERNING ORDERS THAT WERE SCHEDULED FOR SATURDAY JUNE 9, 2001 (PAGES 17-18)?

A. Yes. BellSouth posted Carrier Notification SN91082439 on June 8, 2001 (see exhibit LCSC-36), advising the CLECs that due to unavoidable Emergency Maintenance, the LNP Gateway would be unavailable to process Local Service Requests and Number Portability Administration Center messages from June 8, 2001, at 7:00 PM until June 9, 2001, at 9:00 AM EDT. This was an unfortunate but necessary occurrence that was caused by a failure in an LNP Gateway Release that had been implemented on June 3, 2001. This would have provided Mr. Coleman with the explanation for the unavailability of the gateway.

Q. PLEASE ADDRESS THE PARTIAL PORT ISSUE.

A. Ms. Berger's testimony (pages 40-41) incorrectly asserts that BellSouth does not have the ability to efficiently handle the partial porting of a customer's service from BellSouth to another CLEC. This is not the case. BellSouth has detailed processes and procedures for provisioning a partial port of a customer's service. The process can be found in the BellSouth Business Rules located on the Internet at http://www.interconnection.bellsouth.com/guides/html/leo.html.

Ms. Berger did not provide any specific examples in support of her allegations; thus, BellSouth cannot specifically address her concerns other than to say that BellSouth successfully conducts partial migrations for CLECs without any interruption to the end user's service every day.

I would also point out that to effectuate an efficient partial migration of service, CLECs have responsibilities. As an example CLECs must provide the main billing account

number that will be porting on the LSR. Additionally, the CLEC must obtain from the end user the new billing TN that will remain with BellSouth. A CLEC's failure to adhere to the proper process will impact the efficiency of the partial port process.

Q. PLEASE RESPOND TO WHAT MS. BERGER REFERS TO AS A "SNAP BACK".

A. Ms. Berger's discussion of "snap back" (pages 44-46) references a scenario in which AT&T would like for BellSouth to return a customer to BellSouth after they have been ported to AT&T. If AT&T requests that the number port order be canceled prior to porting, the order will be canceled. AT&T is in control of when the number is ported. BellSouth does not perform the activation of the number port. Once AT&T has ported a customer's number in NPAC, the order is completed and Bellsouth requires that an order be issued to port the customer back to BellSouth. BellSouth has to assume that when an order is received and an FOC is issued, AT&T intends for that order to be worked. If AT&T discovers that either the customer has changed their mind or that AT&T has problems that will not allow them to provide service to the customer, AT&T should notify BellSouth of this prior to the scheduled date for the port and AT&T should not perform the number port activation. After AT&T has ported the number, BellSouth would expect a service order from the customer if they wish to return to BellSouth.

Q. DO YOU BELIEVE THAT BELLSOUTH IS CAUSING A NEGATIVE IMPACT ON CUSTOMERS IN THIS SITUATION?

A. No. AT&T is in complete control of the number port activation process. AT&T also has the opportunity to perform line test prior to port activation. This should negate the need

for post-port issues and snap backs. Also snap backs without establishing valid orders would increase the opportunity for additional negative customer impacts. BellSouth's process is to work with the CLEC to resolve any post port issue as expeditiously as possible. This process minimizes service impacts, additional customer inconvenience and the need for unnecessary rework.

Q. PLEASE DISCUSS HOW A RETAIL CUSTOMER ORDERS AND/OR RECEIVES STATUS INFORMATION VERSUS HOW A CLEC ORDERS AND OBTAINS STATUS INFORMATION FROM BELLSOUTH?

A. AT&T's witness, Mr. Jay Bradbury (pages 133-134) alleges that BellSouth retail customers have access to more orders and/or status information than CLECs. Mr. Bradbury would have you believe that a CLEC's only method for receiving complete, accurate and timely information concerning service requests is through the LCSC. To make his case, Mr. Bradbury chooses to discuss only a subset of the options available to a CLEC and to ignore the interfaces BellSouth provides for order entry, status information and completion notice information, and the many web-based reports discussed in my direct testimony. Unlike the retail customer, who is solely dependent on calling a BellSouth Service Center, the CLEC may utilize either the electronic options for pre-ordering, ordering, and completion notice or BellSouth's web-based reports, without interfacing with the LCSC. A complete description of the various reports to which I am referring can be found on pages 28 through 30 of my direct testimony.

On page 46 of his testimony, Mr. Bradbury makes the statement that BellSouth "does not accept telephonic orders from CLECs". Given Mr. Bradbury's position that every step in the CLEC process should be mechanized (including those things BellSouth handles manually for itself), his complaint about BellSouth's failure to accept telephone orders is strange to say the least. He is correct in that BellSouth does not take verbal service requests from CLECs, but fails to note the very good reasons of this policy. Among other things, this would be a very slow and inefficient way of communicating a service request from the CLEC to BellSouth. Additionally, no audit of what actually was ordered would be available. Such a process would be fraught with the possibility for error and would be impossible to document.

Q. WHAT STEPS HAS BELLSOUTH TAKEN TO REDUCE CALL ANSWERING TIMES IN THE LCSC?

A. I will address Mr. Bradbury (pages 47-48) and Ms. Berger's (pages 24-25) testimony regarding reduction of call answering times in the LCSC. While the LCSC has experienced problems in the past with hold times that were longer than desirable, the April 2001 Monthly State Summary (MSS) reflects that the Average Speed of Answer for the LCSC is better than the retail analogue. The average answer time in the LCSC was 95.63 seconds as compared to 118.91 seconds in BellSouth's combined Retail Units. The May 2001 MSS (see exhibit LCSC-37) shows that performance was ever better with the average answer time in the LCSC at 49.77 and 121.54 for the combined Retail Units. This improvement is largely due to the creation of the Fleming Island LCSC that was placed on line in late January 2001. Operating solely as a call center, the Fleming Island LCSC has been able to handle calls faster and more effectively.

Additionally, this allows the Birmingham and Atlanta LCSCs to concentrate on processing orders, thus creating efficiencies. Further, Mr. Bradbury's assertion that we are providing second-class service to CLECs because they are our competition is totally nonsensical when you consider that for a BellSouth retail customer to place orders or obtain status information, they must call the appropriate service center. For a CLEC, on the other hand, no call is required if they utilize the electronic options or the web-based reports.

Q. PLEASE COMMENT ON THE USE OF BELLSOUTH'S FORCE MODEL.

A. Mr. Bradbury (pages 129-130) obviously has little experience with force models and the events and factors that normally go into building a model and forecasting future demand. As stated in my direct testimony, BellSouth's force model anticipates staffing needs based on historical trends, time and motion studies, internal forecasts (CLEC forecast included), and targeted benchmarks. The models utilize a forward-looking view of activity by product type that allows for sufficient time to hire and train personnel in anticipation of any increase in activity. The LCSC is able to handle spikes in the load by shifting work between centers or utilizing overtime. The examples that Mr. Bradbury referenced (MediaOne, page 130), as well as the issues raised by Mr. Gibbs in paragraph 60 of his affidavit, are examples of one-time events that are not normally considered in force models. The cause of the problems outlined in the attached letters between AT&T and BellSouth were events that could not be forecasted and are handled as spikes in the load. For example, Exhibit LCSC-30 indicates that the reason for the temporary backlog was attributed to a single problem with LEO processing Directory listing orders and improper use of BellSouth's Business Rules by

MediaOne causing additional manual fallout. This not only impacted MediaOne, but also all CLECs. These situations are unanticipated events. In fact, this is a prime example of how BellSouth's plans for handling spikes in the load do work. In this case, the use of overtime and additional trained alternative forces were used to reduce a backlog of 9,400 orders on November 3 to 20 by December 3.

Additionally, it is obvious to me that Mr. Bradbury is misinformed concerning the training that is provided to the LCSC representatives, for he mistakenly assumes that employees in Jacksonville are only trained on answering calls and handling escalations. Let me be clear on this issue. Each LCSC location utilizes the same methods and procedures, access the same databases and receives the same training in support of CLECs across all nine states. While the primary function of the Jacksonville LCSC is to handle CLEC contact calls, the ability to assist the other LCSCs with volume spikes is also present. BellSouth believes this multidimensional capability is a very sound method of meeting CLEC intermittent volume increases. Since each of the LCSCs utilize the same methods and procedures, access the same databases and receive the same training in support of CLECs across all nine states, this process of shifting the load due to the spikes should be transparent to the CLECs.

A center providing support for a CLEC seeking to provide service to customers in South Carolina is the very same center that provides support for a CLEC seeking to provide service to customers in any of the nine states within the BellSouth region. Additionally, methods and procedures utilized by these centers to provide regional support for CLECs are accessible through the Corporate Document and Interface Access ("CDIA") system that provides web-based access to the documents. All

employees have access to the Web site to view or print any documents that they need to perform their functions in accordance with the regional processes supporting CLEC activities. The sameness of the LCSC locations allows each location providing support to CLECs the ability to handle spikes in the load by moving or shifting the work between the locations. All LCSC service representatives receive exactly the same initial training. The service representatives are trained on a product-specific basis (i.e., resale, combinations or UNEs), and not on a state-specific basis. In addition, all LCSC service representatives are subject to the same quality controls and the same incentive plans for performance.

Q. IS THERE PUBLICLY AVAILABLE DATA DEMONSTRATING THAT CALL ANSWERING TIMES HAVE IMPROVED IN THE JACKSONVILLE LCSC?

A. Yes. It is difficult for me to understand Mr. Bradbury's rationale (page 130); when based on his own publicly available and retrieved data for LCSC calls (see page 48), the data supports improved answering times. Additionally, while the answering times have steadily improved (decreased by a factor of 4 from January to April), the Jacksonville Center has been able to provide ordering support to the other two LCSCs by processing over 13,111 various types of LSRs. See Exhibit LCSC-32.

Q. PLEASE COMMENT ON BELLSOUTH'S CONTINUED USE OF DOE AND SONGS INSTEAD OF ROS.

A. First, Mr. Bradbury's position (page 131) evidences a misunderstanding of the term "free form". It means just that. All data must be entered without editing or guides for

data entry. The reason, that ROS is not utilized due to its free format design are as follows: (1) additional training to increase our service representative's expertise would have been required for them to become proficient at formatting an order "free hand" as opposed to having a system format the order for them as DOE and SONGS do; (2) because there are not edits related to our products and services in ROS, there would have been a significant increase in errors and rework. (3) the additional time it would take to create orders in "free hand" mode and to correct resulting errors could delay the provisioning of service for CLECs; and (4) there also would be the opportunity for the wrong service to be provisioned due to the lack of edits.

BellSouth continuously re-examined ROS as a replacement for DOE/SONGS and continues to reject it as a viable solution for the following reasons. Contention between BBS and Small Business for release work, release schedules, and future decision-making efforts could result in a delay in our being able to provide new services/products or mandated services/products (such as number pooling). ROS is, like DOE and SONGS, a non-leverageable legacy system that is on the sunset list. Even now after 3 years, ROS has never been programmed to do anything but the most simple of the "complex" services for retail. ROS is not "fault tolerant," meaning that if it crashes in the middle of a transaction, the transaction is not saved as it is in DOE.

ROS fails to meet the strategic direction and goals of BellSouth. The use of ROS by the LCSC would in no way enhance the experience for CLECs. It is BellSouth's goal that when DOE is replaced, it will benefit our CLEC customers as well as BellSouth. Existing measures are currently in place to assure order processing with the existing service order generation systems meets the CLECs needs.

Q. PLEASE COMMENT ON THE ADEQUACY OF BELLSOUTH'S WEB-BASED REPORTS.

A. I will respond to Mr. Bradbury's assertion (page 132-133) that BellSouth's web-based reports are not adequate for providing CLECs with service request status information. BellSouth provides CLECs with web-based reports designed to provide status information to the CLECs during the initial and subsequent order processes. The different statuses that can be assigned to an order are Pending, FOC, Reject, Clarification, and Jeopardy. A pending status applies to the order when it has been received and is still undergoing processing before additional information can be communicated to the customer. Once the CLEC request is properly evaluated, a definitive response can be given. BellSouth's report provides this information. Providing information prior to this time could cause additional confusion to a CLEC if the situation surrounding their request happens to change before the FOC, Clarification, Reject, or Jeopardy can be given.

The CSOTS and PON status reports show a pending status between the time of receipt of the LSR, a FOC, Reject, Jeopardy, or Clarification. These reports display all information pertinent to the CLEC that is available within the SOCS and LON databases. This is the same information that would be accessed by a service representative if called directly by a CLEC for a status on an order that is still shown to be pending. Therefore, it is not deemed prudent that a customer should expect status

information that is unavailable to BellSouth service representatives during a time in the process that is evaluative in nature.

The PF report provides a CLEC with notification of orders that are "Pending Facilities". Once an order enters this status, the order cannot be fulfilled until the facility issue is reconciled. This report provides the "Estimated Completion Date (ECD)/Estimated Service Date (ESD)" once it becomes available in the SOCS database. No additional status is available, nor should any be expected by the customer until such time as this date is reached or the order is no longer held in a "PF" status.

In summary, these reports provide data to CLECs within the same time frames that BellSouth provides such information to its own end users calling with a question concerning their service request. This is same data available to BST retail.

Additionally, Mr. Bradbury fails to mention that timely status information for electronically submitted requests is provided in a near real time mode and, in fact, BellSouth provides a number of service measurements by which to gauge the performance and responsiveness of the various electronic interfaces in providing such information.

The outstanding change request Mr. Bradbury described will be worked within the confines of the established and working Change Control Process.

Q. PLEASE CLARIFY YOUR COMMENTS CONCERNING THE PF REPORT INCLUDING THE TIMELINESS OF THE DATA.

A. Mr. Bradbury states on page 133 of his testimony that conflicting information regarding the timeliness of the PF report has been provided and I understand how this may have been confusing. Let me clarify this issue. We view all of the web-based reports as a single tool. The information provided to CLECs by this single tool is updated 5 times per day. To be clear, the PF report is updated from a snapshot once per day. I believe this clarifies the conflict.

Q. PLEASE RESPOND TO AT&T AND MCI/WORLDCOM'S UNE-P MIGRATION ISSUES.

A. Various CLECs (Ms. Bernadette Siegler of AT&T, page 6, Ms. Sherry Lichtenberg of WorldCom, page 5, Mr. Edward Gibbs of AT&T, paragraphs 36-37) attempt to paint a picture of an enormous problem with loss of dial tone during conversion of UNE-P and the resulting impact on end user service and results reporting. These CLECs are mischaracterizing the issue as will be explained below. BellSouth has a process in place that ensures a near seamless conversion for the end user from BellSouth to a CLEC. As previously stated, conversion issues have been identified and corrective action taken by BellSouth to limit or eliminate the instance of end user service interruption. BellSouth conducts a UNE-P collaborative meeting to cooperatively work with CLECs to address any issues, which might impact service to the end user. The loss of dial tone issue was listed on the action register in March of 2001. As previously stated, BellSouth took steps to address the issues.

Ms. Seigler's comments (page 6) concerning an unacceptably high rate of loss of service to AT&T end users during conversion to UNE-P, as well as any shortcomings in BellSouth's processes or BellSouth's failure to correct identified BellSouth problems, are a misrepresentation of the facts.

Mr. Gibbs's allegations (paragraph 37) concerning separate BellSouth work groups processing "N" and "D" orders are completely inaccurate. BellSouth does not utilize two separate work groups to perform this work. BellSouth has processes in place that directs the Service Representatives in the LCSC to update both the "N" and " D" orders if the LSR is supplemented to cancel or update the orders.

Q. PLEASE DISCUSS UNE-P CONVERSION PROBLEMS.

A. On pages 10-12 of Ms. Siegler's affidavit, she discusses an analysis of conversion problems experienced to date by AT&T end users. As Ms. Seigler points out, Ms. Berger addressed a letter to me with 12 examples of situations where customers lost dial tone during the conversion. Additionally, the account team requested that AT&T provide additional examples of conversion problems. In all, AT&T provided a total of 38 Purchase Order Numbers ("PONS") for analysis.

Q. WHAT WAS THE RESULT OF THE ANALYSIS?

A. The results are as follows:

- Three of the 38 resulted in the customer losing service during the conversion. Two were the result of BellSouth failing to follow its documented processes and one was a switch feature problem.

- For 12 of the 38, BellSouth did not receive a trouble report from AT&T.

- For 8 of the 38, either no trouble has been found in the BellSouth network or the customer did not know how to use their call forward feature. Of these, 3 were reported greater than 30 days from conversion, 2 greater than 25 days from conversion, one greater than 17 days from conversion and two within 2 days. One of these was a customer education problem and one of these customers reported that he had been slammed by AT&T and subsequently switched back to BellSouth.

- Eight had BellSouth problems in the loop or network terminating wire. Of these, one was greater than 30 days from conversion, three were greater than 20 days from conversion, two were greater than 15 days, and two were less than five days from conversion

- Five of the examples provided were duplicates.

- Two of the examples, we could not locate a valid PON.

In summary, of the 38 submitted by AT&T, only three experienced problems that could be related to the conversion activity.

Q. DOES YOUR ANALYSIS SUPPORT THE CLAIM THAT BELLSOUTH'S PROCESSES CAUSE A HIGH RATE OF END USER SERVICE PROBLEMS?

A. Ms. Siegler's claim that BellSouth processes cause a high rate of end user service problems is unsubstantiated (page 6). BellSouth's processes that support UNE-P conversion provide for a near seamless transfer of service from BellSouth to any CLEC. Yes, there have been opportunities for improvement that we have aggressively pursued to ensure that AT&T and all CLECs are afforded a meaningful opportunity to compete when utilizing the UNE-P product. To date, BellSouth has converted over ---- end users from BellSouth to AT&T using our UNE-P conversion processes. Of the examples supplied by AT&T, three customers lost service during the conversion. The remaining had normal network or customer issues that were not related to the conversion process therefore, the customer would have had the same problem had they stayed with BellSouth.

To try to summarize the impact of loss of dial tone mentioned by all affiants to this proceeding, I would like to offer the following data that supports my earlier statements that BellSouth's use of the D and N order process provides a near seamless conversion process: Regionally BellSouth has processed over 268,841 UNE-P requests from January to May 2001. Breaking these numbers down to each of the respondents commenting on loss of dial tone indicates the following: AT&T has converted ----- with only - occasions of no dial tone attributed to the conversion or .09 of a percent. Additionally, Ms. Lichtenberg's testimony (pages 4-5) indicates that of over ------ lines converted in Georgia through July 2, 2001, --- cases of no dial tone were attributed to

the conversion, or less than 2 percent. However, to be more specific, BellSouth has analyzed 141 purported examples of no dial tone provided by MCI which MCI asserts was attributed to the conversion of UNE-P with the following results.

- Eleven of the 141 could be attributed to the conversion or less than 8% of the 141 examples.

- Seventy of the 141 or 50% were either tested and closed with no trouble found, closed to end user problems or troubles in deregulated wiring.

- Sixty of the 141 or 43% had troubles in BellSouth facilities that would have occurred if the end user had stayed with BellSouth and were not related to the conversion but occurred subsequent to the conversion.

To further support the conclusion that troubles arising from a conversion are minimal is the fact that the average interval from conversion to trouble receipt for the 141 examples provided by MCI is 14 days.

Using this new data, the actual end user loss of dial tone impact due to the conversion is -- of ------ or .11 of a percent. Ms. Lichtenberg is correct (page 5) that no physical work should be required to convert to UNE-P. However her statement, "There appears to be a very serious problem with BellSouth's ordering and provisioning process that needs to be fixed because such large numbers of customers are being affected" is not supported by the data mentioned above.

Q. HAS BELLSOUTH FAILED TO TAKE ACTION TO CORRECT PROBLEMS IDENTIFIED IN THE UNE-P USER GROUP?

A. Absolutely not. BellSouth has not failed to take action to correct problems identified in the UNE-P user group as alleged by Ms. Siegler on pages 8-9 of her testimony. Only two issues have been brought to BellSouth's attention requiring refinement to this process. One deals with tear down of voicemail boxes, and the other with incorrectly assigning new facilities on the "N Order" resulting in service interruption to the end user. The latter was identified through the UNE-P group meetings.

The first was related to MemoryCall™ mailboxes being incorrectly torn down. This issue came up at the CLEC Collaborative meetings held in Louisiana during January 2001. BellSouth agreed to investigate the issue in an effort to resolve the problem. As a result of the investigation an edit was implemented on April 6th requiring a DNTD ("Do Not Tear Down") FID to be added to the "N Order", as well as the "D Order", to prevent the mailboxes from going down on the conversion. The implementation has been successful, and BellSouth has received no further complaints concerning this problem.

The second issue, new facility assignments, was the result of service representatives in the LCSC mishandling manual requests and electronic fallout. To resolve this, BellSouth has conducted refresher training for the LCSC representatives to increase awareness and stress the importance of eliminating any service outage to end-users. The goal is to eliminate outages by issuing quality service orders, assuring the CLECs of a smooth and uninterrupted conversion. This training was completed with all

representatives effective May 18, 2001. BellSouth is confident that these steps have resulted in the elimination of problems causing end users to experience problems during UNE-P conversions. BellSouth will continue to work cooperatively within the confines of the UNE-P User Group meetings, as well as independently on our own, to identify and implement, if necessary, changes to the process.

Q. PLEASE DISCUSS WHY BELLSOUTH DOES NOT PROVIDE DISPOSITION AND CAUSE CODES FOR TROUBLE TICKETS.

A. MCI (see Lichtenberg, page 6 and Kinard page 8) uses the ECTA interface for trouble input, status, and trouble closure information. ECTA is the National ANSI Standard interface for these OSS functions. The National Standard Committee that oversees feature functionality for ECTA, as well as, MCI's Joint Implementation Agreement (JIA) with BellSouth for implementation of the interface, govern the features and functions provided to MCI utilizing the interface. Both the National Standard and the JIA that MCI signed with BellSouth call for providing trouble found codes that are mapped from BellSouth's internal disposition and cause codes. The ECTA trouble found code provides the trouble resolution information that MCI requested in the JIA, are provided for in the National Standard. If MCI desires to have access to BellSouth's internal disposition and cause code schemes, MCI may either request this additional feature through the normal Change Control Process, request that BellSouth provide via the Bona Fide request process, or utilize BellSouth's TAFI interface. When witness, Ms. Lichtenberg states that "BellSouth's CWINS would not provide this information" she is correct. The cost of this additional labor is not included in either the IA with MCI, nor was this feature requested using ECTA as mentioned above.

Q. PLEASE DISCUSS MANUAL PROCESSING OF MCI'S ORDERS.

A. MCI witness, Ms. Lichtenberg (page 7) mentions that 104 orders were rejected for "CLR TEL NO LCON FORMATTED INCORRECTLY". Ms. Lichtenberg further goes on to explain this occurred even though MCI provided the same telephone number to BellSouth that appears on the BellSouth customer service record. This issue is being worked between BellSouth and MCI in weekly meetings attended by MCI Carrier Management and the BellSouth Account team and Operations Staff. It appears to be a data stream problem. Both parties have researched the issue and the problem appears to have stopped before the end of June although BellSouth did not find a problem on BellSouth's side of the interface. Additionally, Ms. Lichtenberg mentions that they have received other clarifications for "assignable order" and "missing USOC". The "assignable order" notice is an indicator that the order can be assigned but there is a USOC discrepancy. Without examples, I cannot respond to either the reason MCI is receiving this clarification, as stated, nor as to the magnitude of the problem. Again, although Ms. Lichtenberg did not provide any examples of the rejects MCI is receiving for "USOC Missing," I can only assume that the error message speaks for itself in that there is a USOC that is required to be populated in order to issue the service MCI is requesting.

Ms. Lichtenberg (page 8) complains that 10 days to respond to a reject or clarification is not reasonable as it is not enough time to respond. I would like to point out that this interval is the same interval for response expected by all CLECs and no other CLEC has mentioned this as a problem in this filing. Additionally, I would point out that as

Ms. Lichtenberg cites on page 10 of her testimony (paraphrased), “postponement of completion of the customer’s order results in customer dissatisfaction”. With that in mind, it would seem to me that MCI would want to respond quickly to rejects and clarifications and certainly would not expect end users to wait 30 days for service which Ms. Lichtenberg seems to think is a reasonable time frame for responding to a clarification or reject.

Ms Lichtenberg cites (page 8) that LCSC representatives rejected 365 requests in error. MCI and AT&T brought this to BellSouth’s attention in May. BellSouth determined that additional training was needed for certain LCSC representatives. The refresher training was completed on May 23, which corrected the problem. Ms. Lichtenberg supports the fact that this has corrected the problem in her testimony on page 9.

Ms. Lichtenberg again references high rates of clarification (pages 9-10) “572 invalid clarifications” and “25% reject rate”. I have already addressed a large subset of the 572 rejects and/or clarifications in that 104 were rejected for valid reasons and 365 were a training problem already corrected. However, I believe Ms. Lichtenberg has raised a more significant issue when she mentions a requirement to validate the end users’ service address prior to submitting the conversion order. Validation of the correct service address, as indicated in BellSouth’s databases, is, and has been, a requirement not only for all CLECs when submitting service requests to BellSouth, but is also a function that a retail representative must perform when submitting a request. Validation of the correct format and service address provided by the end user is tantamount to ensuring timely processing and full utilization of BellSouth mechanized processes. Failure by MCI to perform basic preorder functions, such as address

validation, is a significant contributor to processing delays and results in the high reject rate alluded to in her testimony. Ms. Lichtenberg attempts to indicate this is a BellSouth problem when, in fact, it is a flaw in MCI's processes. If Ms. Lichtenberg wants to change the processes used by BellSouth to serve all CLECs, the Change Control Process is the appropriate forum.

Q. DOES BELLSOUTH HAVE EFFECTIVE COMMUNICATIONS AND PROCESS LINKAGE BETWEEN ITS PROVISIONING CENTER AND ITS MAINTENANCE CENTER?

A. I will respond to Ms. Siegler's claim (pages 9-10) that BellSouth does not have effective communications and process linkage between its provisioning center and its maintenance center. In Ms. Berger's letter to me (see Exhibit LCSC-33), she provided a single example of a problem to support her conclusion. In reality, the single instance was the result of a technician in the CWINs Center simply not following documented procedures. Appropriate action was taken to correct the problem with the individual. (See Exhibit LCSC-34). BellSouth has processes currently in place, as well as the tools, access to databases and appropriate provisioning and maintenance linkages, necessary to support prompt and accurate resolution of maintenance issues arising as a result of recently completed service activity.

Q. PLEASE DISCUSS THE ALLEGATION THAT BELLSOUTH HAS INCONSISTENT BUSINESS RULES.

A. Ms. Seigler is obviously confused on pages 14-17 of her testimony when she discusses inconsistent business rules and conflict between the AT&T stand-alone agreement and information provided by the Account Team dealing with procedures for ordering UNE-P combinations because she refers in paragraph 27 to business rules that do not provide USOCs to be used to populate the TOS field on the LSR. I say this because BellSouth Business Rules never have provided USOCs for UNE-P or any other UNE product. The Business Rules are intended to provide field interdependencies and restrictions and not USOC information. Additionally, in paragraph 28, she alludes to obtaining ordering information from a stand-alone interconnection agreement, which again is not a document intended to provide detailed ordering information. The correct source for the information is provided in Market Service Descriptions ("MSD"), not only for UNE-P combinations, but also for all UNE products. This information is accessible via the Internet at BellSouth's Interconnection web site. The UNE-P MSD has been available on the web site since October of 2000. BellSouth provides detailed business rules and ordering procedures on this web site.

Q. PLEASE DISCUSS THE ISSUE OF ERRONEOUS REJECTS AND MISTAKES MADE BY BELLSOUTH'S SERVICE REPRESENTATIVES.

A. I will respond to paragraphs 29-30 of Ms. Seigler's affidavit, pages 6-9 of Ms. Lichtenberg's testimony and paragraph 59 of Mr. Gibbs affidavit, in which they discuss rejects and errors caused by BellSouth. This issue was a case of human error. To address this issue, BellSouth has provided additional training to certain LCSC representatives. This issue was brought to the attention of BellSouth in May by both AT&T and MCI/WorldCom. (See time periods mentioned in Ms. Seigler's for AT&T,

page 1 and Ms. Lichtenberg for MCI/WorldCom, page 3). BellSouth completed refresher training to all LCSC representatives on May 23 that corrected the problem. To BellSouth's knowledge, there have been no further problems. In fact, Ms. Lichtenberg continued to support the statement that "the initial problem of incorrect manual rejects appears to have stopped as of May 23". BellSouth continues to monitor the quality of the work being performed by the Service Representatives in the LCSC. Where areas of deficiency are discovered, BellSouth does provide additional training and resources to correct the problem in order to meet the expectations of both the CLECs and BellSouth.

Q. DOES BELLSOUTH MAKE LAST MINUTE CHANGES IN ITS ORDERING PROCEDURES?

A. No. In Ms. Siegler's testimony where she discusses (see pages 17-19) last minute changes made by BellSouth in order procedures, she hits the nail on the head in paragraph 33 when she describes the problem as AT&T's misunderstanding of the BellSouth Business Rules. The Business Rules were explained to Ms. Seigler in detail by the Account Team. Additionally the MSD, which I previously discussed, provides a detailed description of the USOCs, ordering procedures and Business Rules for UNE-P. It is apparent that Ms. Seigler is not familiar with the information that BellSouth provides on this web site.

Q. PLEASE DISCUSS ERRONEOUS DISCONNECTS ASSOCIATED WITH COORDINATED HOT CUTS.

A. I will respond to pages 21-23 of Ms. Denise Berger's testimony where she describes a problem with erroneous disconnects associated with coordinated hot cuts. A coordinated hot cut is just that, BellSouth and AT&T coordinate the conversion including number porting and the disconnect in BellSouth's legacy system. For a coordinated conversion of a loop with LNP, BellSouth allows AT&T to accept the conversion and perform appropriate testing prior to accepting the service. If AT&T accepts the service or is not available to accept the service, based on the terms of our "Hot Cut" memorandum, BellSouth runs the disconnect to ensure proper switch translations are completed in the BellSouth switch. AT&T is in control of when the disconnect is completed by BellSouth in this instance and, therefore, should be ready to accept the customer's service. In order for BellSouth to reestablish service, service orders must be issued to reestablish service to the end user. This is the same process that occurs for an erroneous disconnect of a BellSouth end user. Both are handled as a provisioning issue and not a maintenance issue.

Q. PLEASE COMMENT ON ERRONEOUS DISCONNECTS CAUSED BY AT&T ERRORS.

A. I will respond to page 22 of Ms. Berger's testimony where she discusses erroneous disconnects caused by AT&T errors. BellSouth processes disconnects of end users per AT&T's submission of LSRs. Where AT&T has erroneously disconnected their end users, BellSouth has already processed the disconnect request in its legacy systems. The burden for ensuring the appropriateness of the disconnect, is clearly on AT&T's shoulders and not BellSouth's. Again, in order for BellSouth to reestablish service, service orders must be issued to reestablish service to the end user. This is the same

process that occurs for an erroneous disconnect of a BellSouth end user. Both are handled as a provisioning issue and not a maintenance issue.

Q. DOES BELLSOUTH HAVE ONLY 2 TRAINED EMPLOYEES TO HANDLE LNP PROBLEMS?

A. No. BellSouth's response to Ms. Berger (page 23) assertion that BellSouth has only 2 trained employees to handle LNP problems is as follows. Again, in all cases AT&T is in control of when a number ports. BellSouth has a highly trained staff of employees in its LCSCs (over 400 trained in LNP) to provide assistance prior to AT&T accepting responsibility of the ported number. These employees are scheduled Monday - Friday 8:00 a.m. to 6:00 p.m. Additionally, BellSouth created a unique center in the CWINS which is staffed by 13 employees and provides coverage to assist CLECs with post port problems. Hours of coverage are 8:00 a.m. to 12:00 a.m. (midnight) Monday through Friday and Saturday 8:00 a.m. to 4:00 p.m. After hours coverage is handled by personnel within the center who are able to contact appropriate personnel to handle emergency situations on a 24 hour, 7 day a week basis.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.