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 Ronald M. Pate, 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 13 pages and 17 exhibit(s).

Ronald M. Pate

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

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF RONALD M. PATE

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

Case No. 2001-105

JULY 30, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. ARE YOU THE SAME RONALD M. PATE WHO PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut the testimony filed by Jay Bradbury of AT&T, Denise Berger of AT&T, Bernadette Seigler of AT&T,

Edward Gibbs of AT&T, Sharon Norris of AT&T, Steven Turner of AT&T Mark G. Felton of Sprint, and Sherry Lichtenberg of MCI/WorldCom filed on July 9, 2001

Q. IN WHAT CONTEXT SHOULD YOUR TESTIMONY BE READ?

A. My testimony should be read in conjunction with other rebuttal testimony supporting BellSouth's 271 application.

Further, for the convenience of this Commission, a list of acronyms has been provided in Exhibit OSS-72 to my direct testimony filed on May 18, 2001.

Q. DO YOU HAVE PRELIMINARY COMMENTS?

A. Yes. In this testimony, I will address the issues that have been raised by the Competitive Local Exchange Carriers (“CLECs”) by topic and category within those topics. Many of the issues raised in this proceeding are currently being handled collaboratively by BellSouth and the CLECs through the regional Change Control Process (“CCP"), or otherwise dealt with by this Commission. I also will address the interveners’ comments regarding the independent third party test that was performed by KPMG for the state of Georgia and regionality issues, including the report prepared by PricewaterhouseCoopers.

First, I will discuss the regionality of BellSouth Operations Support System ("OSS"). Next, I will describe the independent third party test in Georgia, and then I will discuss many of the CLECs' concerns about the Georgia test. The remainder of the CLECs' concerns about the Georgia test will be discussed in the context of a particular issue. For example, concerns about the Georgia test of change management will be discussed in the section on change management.

Regionality Issues and the PricewaterhouseCoopers Regionality Report

Q. DID YOU DISCUSS REGIONALITY IN YOUR DIRECT TESTIMONY OF MAY 18, 2001?

A. Yes, I did, on pages 179-190. Also, attached to my direct testimony of May 18, 2001, was Exhibit OSS-74, PriceWaterhouseCoopers Report on the Region-wide Comparability of BellSouth's Pre-Order and Order Operational Support Systems as of May 3, 2001.

I now attach the Affidavit of Robert Lattimore of May 21, 2001, as Exhibit OSS-75. This exhibit supplements Exhibit OSS-74.

Q. PLEASE DESCRIBE THE PRICEWATERHOUSE REGIONALITY REPORT, AND THE VALID AND PROFESSIONAL PRINCIPLES THAT SUPPORT SUCH AN ATTESTATION.

A. Mr. Bradbury's testimony, beginning on page 19, focuses on the validity of regionality and this Commission's ability to rely on test results from other states. On page 22 of his testimony, Mr. Bradbury states "[r]ather, BellSouth is urging the Kentucky Commission to determine up-front that BellSouth's OSS is the "same" regionally without reference to any particular data or factual assertion." This statement is not true. As described in my direct testimony on May 18, 2001, starting at page 9, line 1, BellSouth engaged PricewaterhouseCoopers (PwC) to examine BellSouth's assertions on the regionality of its OSS in accordance with attestation standards established by the American Institute of Certified Public Accountants. An attest engagement is one in which a practitioner is engaged to issue a written communication that expresses a conclusion about the reliability of a written assertion that is the responsibility of another party; in this case the party was BellSouth. Under the AICPA attestation standards, an examination is the highest level of assurance that can be provided on an assertion and results in an opinion on the part of PwC that the assertions presented are fairly stated in all material respects.

BellSouth modeled its attestation examination directly after the Southwestern Bell Telephone Company (SBC) Five State Regional OSS Attestation Examination which is attached as Exhibit OSS-76. This model was successfully used in SBC filings, so BellSouth used that model as its roadmap to establish the same burden of proof. The only difference between the SBC and BellSouth Attestation examinations is that BellSouth

added a second assertion on two of its manual order input systems used by its LCSC. The Management Assertions validated by PwC are as follows:

First, BellSouth utilizes the same Pre-Order and Order operational support systems (OSS) throughout its nine-state region to support wholesale competing local exchange carrier (CLEC) activity, based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems.

As it relates to the first assertion, "sameness" is defined as the following:

> The applications and interfaces implemented and available are identical across the nine-state region. "Identical" is defined as one unique set of software coding and configuration ("version") installed on either one or multiple computer servers ("instances") that support all nine-states in an equitable manner.
>
> The processes, personnel and work center facilities are consistently available and employed across the nine-state region and there are no significant aspects to the processes, personnel or work center facilities that would provide one state a greater service level or benefit than the other states in the nine-state region.

Second, BellSouth's DOE and SONGS systems have no material differences in the functionality or performance for service order entry by the Local Carrier Service Centers (LCSC), based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems. PwC examined functionality and performance. The Functionality assertion was based on the following criteria:

- The same Local Service Requests (LSRs), created from a single set of business rules are used for order entry
- SOCS requires the same LSR screening and validating procedure
- Similar processes are used for creating a Service Order
- SOCS requires checking for and clearing order entry or initiation errors.
- Both systems output must adhere to the service order edits housed in SOCS.BellSouth also asserted that there was no material difference in performance of order entry between DOE and SONGS based on the following criteria:
- Orders that are input through both DOE and SONGS are created in SOCS on a real-time basis upon submission
- Similar orders from throughout the nine-state region can be input within reasonably similar timeframes, regardless of whether DOE or SONGS is used.
- Service Representatives are cross-trained on both DOE and SONGS and utilize both systems on a regular basis dependent upon the relative volume and type of transactions by state.

PwC concluded that its examination provided a reasonable basis for their opinion. In its opinion, PwC determined that the BellSouth management assertions were fairly stated, in all material respects, as of May 3, 2001, based on the criteria set forth in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems. The PwC Report provides data and validated factual

assertions that this Commission can rely upon to establish the regionality of BellSouth's OSS.

Q. **ARE THERE ANY MATERIAL DIFFERENCES BETWEEN THE WAY DATA IS INPUT IN DOE OR SONGS?**

A. No. In other state 271 filings (Alabama, for example), CLECs have commented on PWC's remarks regarding how data is input into DOE and SONGS, and differences in the way commands, function keys, and procedures for the two systems. PwC, however, validated that these differences were trivial and certainly not material in nature as it relates to the performance of either system.

Q. DID PWC ADDRESS PERFORMANCE?

A. Yes. Contrary to Mr. Bradbury's comments on pages 32-33, PwC did address performance. In fact, PwC completed a performance comparability examination for DOE and SONGS with the following testing approach:

- Observed transactions input into DOE and SONGS and ensured that the process was not materially different. Transactions included each service type (i.e., Resale, Complex, and UNE) and were for each state

- Observed DOE and SONGS data validation controls and ensured that they were not materially different (i.e., required fields). LSRs are created from a single set of business rules for the purposed for submitting transactions. LSRs are

submitted to SOCS in the same format and subject to the same SOCS validations

- Ensured that there are no material differences between DOE and SONGS based on the end user State. This was completed via observation of LSRs from all states within the BellSouth region and ensuring the process for submission is consistent

- Ensured that there are no material differences between DOE and SONGS launch, logon and navigational commands via observation of service representatives completing daily work

- Observed the process for submitting orders to SOCS and ensured that consistent processes are followed for DOE and SONGS and for each state in BellSouth's region.

As referenced in Mr. Bradbury's testimony on page 31, there was an Informal Conference held on May 10, 2001, with the Kentucky PSC wherein the PwC regionality attestation report was discussed. Based on the conference, BellSouth requested that PwC perform a statistically based evaluation of the time it takes to input orders in DOE versus SONGS along with an analysis of downstream errors. As described below, PwC has completed this evaluation and re-substantiated BellSouth's original assertion that there are no material performance differences in DOE and SONGS.

The specifics are contained in the PwC DOE and SONGS Comparability Accuracy and Timeliness Report of July 20, 2001, which is attached to Exhibit OSS-77. Exhibit OSS-77 is the Affidavit of Mr. Robert L. Lattimore of July 20, 2001. In his affidavit, Mr. Lattimore describes the report along with an overview of the level of involvement of PwC professionals. He

identifies that the engagement was performed under the Consulting Standards of the American Institute of Certified Public Accountants (AICPA) and then describes standards of professional competence, due professional care, planning and supervision, and sufficient relevant data. PwC completed the timeliness assessment using a statistically based methodology. In their report, PwC defined how it reached its sample determination using a confidence level of 95%, a tolerable rate of 1% and an expected rate of 0%. PwC's report defines these terms and expresses the significance of why these levels were selected since PwC's objective was to yield a high confidence level and to minimize the risk of the sample not being representative of the entire population. PwC defined its scope, methodology and procedures used for the timeliness assessment for the transaction input in DOE and SONGS. PwC measured (via a stopwatch) the amount of time it took LCSC service representatives to successfully submit orders into SOCS via DOE and SONGS. PwC found that based on a statistically valid sample, the average input time for DOE was 8 minutes and 22 seconds, while the SONGS input time was 5 minutes and 26 seconds. The less then 3 minute difference between the two input times is not material. PwC depicted the relationship and the relative materiality of the time incurred inputting an order into DOE and SONGS compared to the FOC timeliness for the partially mechanized orders standard of 18 hours and for the manual orders standard of 36 hours. This depiction can be seen on pages 5 and 6 of the PwC report of July 20, 2001. The pie charts demonstrate that the average time to process an order through either system is less then 1% of the overall process for the FOC interval

for either partially mechanized or manually submitted orders. There is no material difference for this order input activity particularly when you consider the FOC Timeliness Service Quality Measure (SQM) standard in which this component process resides. The current standards established by the Georgia Public Service Commission are 18 hours for partially mechanized and 36 hours for non-mechanized service requests. This report validates the results from the original May 3, 2001 PwC report.

Additionally, PwC defined its scope, methodology and procedures used for the accuracy assessment for the transaction input in DOE and SONGS. This assessment can also be seen in the July 20, 2001 report found in Exhibit OSS-77:

> To determine the accuracy of orders input into DOE and SONGS, PwC reviewed the history log files maintained in SOCS. PwC documented the orders that experienced downstream system edit errors, which had to be subsequently corrected by a BellSouth service representative. PwC was unable to review SOCS history log files for some orders due to a change in the original order due date which resulted in an earlier completion of the order. The completed order history is purged from SOCS the day after an order completes. In these cases, PwC observed the final status of the order within the Mechanized On-line Billing System (MOBI). This allowed them to determine if the order had completed, was in pending status or had been cancelled. PwC did review the SOCS history log files for 239 orders that had been input through DOE

and 220 that had been input through SONGS. A distribution across product types and by types of errors can be found in their July 20, 2001 report. A description of each downstream system edit error type along with examples of what caused the edit errors can also be found in the report. BellSouth utilizes strong edit checks within its systems to help eliminate potential downstream provisioning errors. PwC determined that 19.7% of the orders submitted through DOE and 20.0% of the orders submitted through SONGS experienced downstream system edit errors. Again, PwC was able to validate that BellSouth's assertion that there is no material difference in performance for service order entry by the LCSCs through the DOE and SONGS systems is accurate and correct.

PwC has now completed two independent assessments on the two BellSouth assertions on regionality. These assessments have concluded that BellSouth's systems are regional and that there are no material differences between DOE and SONGS.

Q. SUMMARIZE THE REASONS THAT THIS COMMISSION SHOULD RELY UPON THE PWC REPORT TO FIND THAT BELLSOUTH'S OSS ARE REGIONAL IN NATURE ACCORDING TO THE REQUIREMENTS OF STATE AND FEDERAL COMMISSIONS.

A. BellSouth adopted the roadmap that SBC used to provide the proof and gain the support and approval of state and federal commissions. PwC

examined BellSouth's assertions on the regionality of BellSouth's OSS in accordance with attestation standards established by the American Institute of Certified Public Accountants and PwC concluded that its examination provided a reasonable basis for its opinion that the BellSouth management assertions were fairly stated, in all material respects. There is substance to the PwC report and this Commission can rely on it as a component in its consideration of BellSouth's application.

Q. ARE BELLSOUTH'S OSS, IN FACT, REGIONAL IN NATURE, AND IN COMPLIANCE WITH THE FCC'S REQUIREMENTS?

A. Yes. On pages 25-30, Mr. Bradbury makes a number of claims about BellSouth's legacy systems (OSS) for pre-ordering and ordering, and the supposed lack of regionality of these systems. I discussed the regionality of BellSouth's OSS and the electronic interfaces for CLECs on pages 179-190 of my direct testimony of May 18, 2001. To reiterate, BellSouth provides CLECs with one set of electronic and manual interfaces for all CLEC resale and UNE service requests throughout BellSouth's nine-state region – all of which provide nondiscriminatory access to BellSouth's OSS. Very simply put, a CLEC in Alabama uses the same interfaces for access to the same BellSouth OSS as a CLEC in any other state in BellSouth's region. There is only one TAG, RoboTAG™, EDI, LENS, TAFI, ECTA, ODUF, EODUF, and ADUF. Attached to this testimony is Exhibit OSS-78, which describes the electronic interfaces used by CLECs, the databases used exclusively by CLECs, the OSS shared by CLECs and BellSouth, the

function of each, the location of the server or servers, and the geographical responsibility of each of these applications. To the extent that there are separate servers for processing CLEC requests via these interfaces, the servers use the same programming code and are designed to operate in an indistinguishable manner. Similar to the situation with SWBT, the servers use the same type of hardware running identical software.[1] Please see the Testimony of David Scollard for BellSouth's response to AT&T's allegations about the data centers to process usage records for production of bills sent to CLECs.

Q. IS THERE ANY LOGICAL BASIS FOR MR. BRADBURY'S COMMENTS REGARDING THE FACT THAT BELLSOUTH'S DATA IS NOT CONTAINED IN A SINGLE DATABASE?

A No. Mr. Bradbury's comments on pages 27-28, are unsupported by his testimony and in reality. There is no basis for Mr. Bradbury's claim that a database will perform more effectively simply because all of the data is in one location. As I explained in my direct testimony filed May 18, 2001, on page 16, BellSouth's preordering OSS functionality is regional in scope and performs in a robust and reliable manner. The servers use the same type of hardware running the identical software. To further contradict Mr.

[1] "Where SWBT has discernibly separate OSS, SWBT demonstrates that its OSS reasonably can be expected to behave the same way in all three states. As described below, for example, the use by SWBT of two different order processing systems (a SORD processor in Dallas for retail and wholesale orders in Texas, and a SORD processor in St. Louis for retail and wholesale orders in SWBT's other four in-region states) use the same programming code and, moreover, are designed to operate in an indistinguishable manner." Kansas/Oklahoma Order, paragraph 111.

Bradbury's assertions, PWC reported on the regionality of BellSouth's OSS.

PwC concluded that the:

> Applications and interfaces implemented and available are identical across the nine-state region. "Identical" was defined as one unique set of software coding and configuration ("version") installed on either one or multiple computer servers ("instances") that support all nine-states in an equitable manner. (See the Affidavit of Lattimore of May 21, 2001, which is Exhibit OSS-75.)

KPMG'S THIRD-PARTY TEST IN GEORGIA

Q. PLEASE ADDRESS THE CLECS' COMPLAINTS ABOUT THE ADEQUACY OF THE INDEPENDENT THIRD-PARTY TEST IN GEORGIA.

A. The testimony filed by the CLECs on July 9, 2001, in particular that of Mr. Bradbury of AT&T, Ms. Norris of AT&T, Mr. Bell of AT&T, and in testimony filed by other CLECs in the 271 proceedings in other states, complains extensively about the scope of the independent third party test in Georgia, often comparing it with tests that have or are taking place in other states. When reading these witnesses' statements, particularly the "laundry lists" on pages 4-5 and 10-11 of Ms. Norris's testimony, it is easy to forget that the test that was ordered by the Georgia Commission was the test that

was executed by KPMG – and that the very CLECs that are now complaining had ample opportunity to participate in the design and execution of this Georgia test. (See Exhibit OSS-64 to my testimony filed on May 18, 2001, pages VIII-A-4-A-23, for a listing of meetings that were held during the testing process.) Beginning on page 143, of my direct testimony of May 18, 2001, I described in detail the scope and purpose of the Georgia test. Before discussing the issues raised by the CLECs on July 9, 2001, I would like to summarize the scope, purpose, and conclusions of the independent third party test in Georgia.

When it first ordered an independent, third-party test of BellSouth's OSS two years ago, the Georgia Commission correctly recognized that actual "commercial usage" should be the primary factor in evaluating nondiscriminatory access – a view shared by the FCC.[2] As a result, the Georgia Commission originally structured the third-party test as a "focused, supervised audit" of BellSouth's OSS in recognition of the extensive commercial usage that BellSouth's OSS experienced since the Georgia Commission first began examining BellSouth's systems in 1995.

In response to CLEC concerns, however, the Georgia Commission subsequently expanded the scope of the Georgia third-party test. With the implementation of the Master Test Plan ("MTP") and the Supplemental

[2] In determining operational readiness, the FCC examines "performance measurements and other evidence of commercial readiness to ascertain whether the BOC's OSS is handling current demand and will be able to handle reasonably foreseeable demand volumes." *New York Order* ¶ 89. According to the FCC, "actual commercial usage" is the most probative evidence that OSS functions are operationally ready. *Id*.; *see also Texas Order* ¶ 98. Absent commercial usage data, the FCC will consider the results of carrier-to-carrier testing, independent third-party testing, and internal testing in assessing the commercial readiness of a BOC's OSS. *Id.*

Test Plan ("STP"), KPMG tested the OSS functions of pre-ordering, ordering and provisioning, maintenance and repair, and billing associated with the following service delivery methods: unbundled analog loops with and without Interim Number Portability and Local Number Portability; unbundled switch ports; unbundled loop/port combinations; and resold services. KPMG also tested the following: the pre-ordering, ordering, and provisioning of xDSL loops; the Change Management process, including a review of the process as it related to implementation of OSS '99; the processes and procedures supporting the calculation of performance data; and BellSouth's flow-through reporting. The depth and breadth of KPMG's testing is evident from the sheer volume of KPMG's Final Reports. These reports were attached to my testimony of May 18, 2001, as Exhibits OSS-64 through OSS-66.

To be sure, the test conducted in Georgia is different in scope than third-party OSS tests conducted in other states, as the CLECs have pointed out. Such differences, however, are expected, as is evident from the FCC's Section 271 decisions, wherein the FCC has rejected any "cookie cutter" approach to third-party OSS tests. (*See Texas Order* ¶ 103 (rejecting argument that Southwestern Bell Telephone Company's 271 application is "inadequate" because "the third party test in Texas was less comprehensive than the test executed by KPMG in New York, with respect to the Bell Atlantic Section 271 process.") The scope of the third-party OSS test in New York was different than the scope of the Texas test, which was different than the scope of the third-party test in

Massachusetts. In short, that the Georgia test was different by design than other third-party OSS tests does not detract from the usefulness of the Georgia test.

Nevertheless, the Georgia test is comparable in scope to the third party tests conducted in New York and Texas, both of which received 271 approval. The similarities and differences between the Georgia test and those in New York and Texas were demonstrated in Exhibit OSS-71, which was attached to my direct testimony of May 18, 2001. The Georgia test included the same functionality review of OSS Business processes as New York and Texas. In addition, all three tests assess OSS scalability. All three tests included normal volume and peak testing of the interfaces. Moreover, the Georgia test reviewed all documentation for maintenance, updates and communication, as did New York and Texas. Like New York and Texas, the Georgia test assessed change management including the notice and completion intervals; release versioning policy; defect management process; and OSS interface development review. All three tests included functional testing of pre-ordering and ordering. All three tests provisioned orders, evaluated provisioning processes, and tested the performance of specific provisioning measures. Georgia and New York tested basic functionalities of Maintenance and Repair, and included a M&R process parity evaluation. In some cases, the Georgia test went beyond the tests in New York and Texas. For example, the Georgia test included manual ordering for xDSL loops while the New York test did not.

Moreover, the Georgia test included a more extensive performance metrics evaluation than either New York or Texas.

The Georgia test meets all of the criteria established by the FCC in its decision on Bell Atlantic's New York application. Specifically, in the Georgia test, like the New York test, KPMG was an independent tester; conducted a military-style test; made efforts to place itself in the position of an actual market entrant; and made efforts to maintain blindness when possible. As in New York, KPMG established "a pseudo-CLEC" as part of the Georgia test in order "to live the CLEC experience." (See Exhibit OSS-64 to my testimony of May 18, 2001, the Master Test Plan Final Report, at II-5.) In compliance with FCC decisions, the Georgia test is a focused test that appropriately concentrates on the specific areas of BellSouth's OSS that had not experienced significant commercial usage. As set forth in the Master Test Plan, the test covered all five core OSS processes (pre-ordering; ordering; provisioning; maintenance and repair; and billing); electronic interfaces to the OSS (TAG, EDI, TAFI, ECTA, ODUF, ADUF, CRIS and CABS); UNE analog loops (with and without number portability); UNE switched ports; UNE business and residence port-loop combinations; LNP; and normal and peak volume testing of the electronic interfaces for pre-ordering; ordering, and maintenance and repair using a representative mix of resale services and UNE transactions. The Georgia test also provides for an audit of BellSouth's flow-through Service Request Report for the latest three months of data.

In a Supplemental Test Plan, the Georgia Commission expanded the test to include an assessment of the change management process as it applied to the implementation of Release 6.0 ("OSS99"); an evaluation of pre-ordering, ordering and provisioning of xDSL loops; a functional test of resale pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions for the top 50 electronically orderable retail services available for resale; and an evaluation of the processes and procedures for the collection and calculation of performance data.

In all, KPMG analyzed 1,173 criteria in eight functional areas. KPMG analyzed each criterion, and the results fell into five categories: satisfied, not satisfied, not complete, no result, and not applicable. KPMG determined that 95% of the completed criteria were satisfied. 1.8% are "not satisfied," 1.5% are "no report," and 0.3% are not applicable. Eleven criteria (0.9%; all metrics) remain categorized as not complete at this time. Of the few not satisfied criteria, KPMG has given its professional opinion that most of these items would not, in and of themselves, have a material adverse impact on competition. KPMG stated in its March 20, 2001 opinion letter, "No deficiencies creating potentially material adverse impacts on competition currently exist in Pre-Ordering, Billing, Maintenance & Repair, Capacity Management, Change Management, and Flow-Through." (Attached to my direct testimony of May 18, 2001, as Exhibit OSS-67.)

Notwithstanding any suggestion to the contrary, KPMG conducted a comprehensive, independent, third-party test of BellSouth's OSS consistent with the Georgia Commission's directives. KPMG's Final Reports and the KPMG Opinion Letter provide persuasive evidence that BellSouth has met its obligation to provide nondiscriminatory access to its OSS as required by the Telecommunications Act of 1996 ("1996 Act").

Q. PLEASE COMMENT ON THE CLECS' COMPARISONS BETWEEN THE EXCEPTIONS ISSUED IN THE GEORGIA TEST AND THOSE ISSUED IN THE FLORIDA TEST.

A. The CLECs' witnesses, especially Mr. Bradbury and Ms. Norris of AT&T, and Ms. Lichtenberg of MCI/WorldCom, spend considerable time comparing the observations and exceptions from the Florida test with the exceptions and finds of the Georgia test. In making these comparisons, these witnesses have made a number of generalizations in which they allege that many of the exceptions that were satisfied in the Georgia Test, were then re-opened in the Florida Test. These statements are wrong when applied to some of the observations and exceptions, and misleading applied to others.

Ms. Norris of AT&T has filed Exhibit SEN3PT-1, and Mr. Bradbury has filed JMB-23, which provide lists of observations and exceptions regarding issues, many of which were simply not within the scope of the Georgia test. The implication is that the differences between Florida and Georgia,

in and of themselves, make the Georgia test invalid. This is not the case. Instead, the differences merely reflect that the scope of the Georgia test different from the scope of the Florida test. As I discussed earlier, the FCC has specifically rejected the suggestion by CLECs that third party tests should follow a "cookie cutter" pattern. KPMG completed and concluded the test in Georgia based upon the scope of that test as ordered by the Georgia Commission.

Mr. Bradbury of AT&T comments that observations and exceptions found in the Third-Party Test in Florida demonstrate that BellSouth has problems with the implementation of business rules and with the adequacy of documentation and processes related to the support BellSouth provides CLECs. Additionally, Ms Norris's Exhibit SEN3PT-1, on pages 11-15, lists 22 observations and 14 exceptions from the Florida test that she calls "repeats." Of those that BellSouth investigated, most were related to different issues, and were not "repeats" at all. I have provided a detailed response to Observations 29, 30, 61, and 82, along with Exceptions 23, 33, 38, 41, 63, and 71 in my Exhibit OSS-79. Because none of these six Florida exceptions were about the *same* issue in both the Florida and Georgia tests, it follows that none of these issues were "missed" during the Georgia test. It appears that Ms. Norris disregards the fact that many of these issues have been thoroughly tested and conclusively satisfied in both the Georgia and Florida tests. Of those exceptions and observations still open in Florida, BellSouth is working with KPMG to close them.

My Exhibit OSS-79 also includes responses to other observations and exceptions mentioned in Ms. Norris's SEN3PT-1 and Mr. Bradbury's JMB-23. Ms. Norris' comments about exceptions related to LNP, on page 6 of her testimony, are also addressed in Exhibit OSS-79. Responses, however, to the CLECs' remarks about a exceptions related to manual or LCSC matters, performance measurements, and billing are covered in the testimony of BellSouth's witnesses, Mr. Ainsworth, Mr. Varner and Mr. Scollard. It is important to note that, between February 2000 and January 2001, BellSouth made many changes due to the Georgia third party test. In many instances, KPMG opened observations and exceptions in the Florida test after auditing code and documentation that dated from the time between February 2000 through January 2001, before BellSouth had implemented the changes to satisfy the Georgia Exception. After KPMG opened an observation or exception in Florida that was based on old information, BellSouth asked KPMG to review current information.

Parity of Performance

Q. HOW IS PARITY EVALUATED DURING THIRD-PARTY TESTS?

A. Beginning on page 7 of her testimony, Ms. Norris of AT&T complains that the Georgia third party test did not measure BellSouth's parity of performance. The Georgia Commission and the FCC have established that parity is evaluated by reviewing the RBOC wholesale performance results against its retail analogs. If the performance results show that an

RBOC serves its CLECs with same level of service as it serves itself or its retail customers, then a further process parity evaluation would be irrelevant. This is the same method of proof that was used in the New York, Texas, and Massachusetts third party tests.

The Georgia test has the most comprehensive performance metrics evaluation of all the tests performed so far by any state. It contains 430 evaluation criteria against 48 in New York and 126 in Massachusetts. Moreover, and most importantly, the BellSouth's performance measurement plan reports on over 1700 sub-metrics, significantly more detail than all other RBOCs. As a result, this Commission will have an enormous amount of actual commercial data by which to correctly evaluate BellSouth's position of parity to CLECs.

Interfaces used by CLECs and Interface Development

Q. PLEASE DISCUSS THE INTERFACES THAT WERE EVALUATED DURING THE GEORGIA TEST.

A. Beginning on page 8, Ms. Norris of AT&T claims that the Georgia test is incomplete as it related to electronic interfaces testing because it reviewed versions that pre-dated the OSS '99 release and did not review any versions of certain other interfaces. This complaint exemplifies the fact that the CLECs will never agree that it is time to review BellSouth's compliance with the Act. Instead, the CLECs will always argue that there

is some change in the industry that necessitates delay. From the CLECs' perspective, this is a fool-proof strategy because the telecommunications industry is always changing – new technology, new products, new competitors. BellSouth's (and other RBOCs') interfaces and systems are constantly evolving. Internal, regulatory, and even CLEC-driven changes are incorporated into the systems to increase system functionality and performance. To argue that the Commission should wait for the change to stop is to argue that the Commission should never move forward.

A third party test, by its nature, must test a snapshot in time. BellSouth enhanced its OSS during the Georgia test, and is enhancing its OSS during the Florida test. The fact that things change during or after the test does not alleviate the probative value of the test – that BellSouth provides adequate access, functionality, and performance to CLECs. The fact that the systems have evolved since the Georgia test should not impact this Commission's use of the test. Otherwise, no third party test would ever have value.

Moreover, with respect to OSS99, KPMG tested the OSS99 change management pursuant to the STP in the Georgia test. Among other things, the STP was designed to assess the electronic interface change control process as applied to the implementation of OSS99. KPMG examined the methods and procedures that BellSouth used to develop and release the OSS99 applications package and supporting

documentation (CM-2). KPMG found that BellSouth satisfied all of the test criteria for change management, including OSS99.

In addition, BellSouth and AT&T conducted a successful carrier-to-carrier test of OSS99 in the fourth quarter of 1999. AT&T would have this Commission believe that the carrier-to-carrier beta test of OSS99 was unsuccessful (See the Affidavit of Edward Gibbs of AT&T filed with Mr. Bradbury's testimony of July 9, 2001), However my testimony below shows that the objectives of the test were met.

On page 8, Ms. Norris complains that BellSouth did not test LENS or RoboTAG™. The Georgia Commission did not order the testing of LENS, because there was commercial usage for LENS at the time the test began in May 1999. 153 CLECs were using LENS region-wide. This usage proves the accessibility and functionality of LENS better than a third party test evaluation could. RoboTAG™ was not available at the time the Georgia test was developed. In addition to this, RoboTAG is a stand-alone product, which BellSouth sells to CLECs that choose not to develop applications to interact with the TAG gateway on their own. Currently, there are 331 CLECs/OCNs using LENS and 6 CLECs using RoboTAG™.

Ms. Norris, on page 9, complains that KPMG did not evaluate the ability of CLECs to build interfaces based on BellSouth's documentation. Once again, the significant commercial usage of BellSouth's CLEC interfaces obviates the need for third party testing in this area. There are 37

CLECs/OCNs using EDI and 71 CLECs/OCNs using TAG, with a combined region-wide electronically submitted non-LNP LSRs of approximately 109,000 in June 2001.[3] Because CLECs are using these interfaces in commercially significant numbers, additional verification of a CLEC's ability to build the interface is unnecessary.

Finally, BellSouth will demonstrate to the Commission significant commercial usage of interfaces, including OSS99,. in Kentucky and throughout BellSouth's region. For the *12 months* ending May 2001, CLECs submitted 423,641 LSRs through EDI, 972,151 through TAG, and 2,178,899 through LENS.

Manual Support Systems

Q. PLEASE ADDRESS THE CLECS' COMPLAINTS REGARDING THE TESTING OF MANUAL PROCESSES.

A. Ms. Norris, on pages 10-11 of her testimony, complains that the Georgia test did not include a test of manual processes. That is not true. Indeed, the Georgia functional testing did include BellSouth's performance on partially mechanized orders, which are those that are submitted electronically but fall out for manual handling. Partially mechanized orders were tested, among other things, for timeliness and accuracy. In addition, the Georgia Commission added a manual order process evaluation for

[3]These totals based on Operating Company Numbers ("OCNs").

xDSL and manual loop makeup in the STP, which included evaluation of the xDSL Work Center and Capacity Management evaluation. Using AT&T's own numbers, 65% of manual orders were indeed included in this testing process.

Moreover, there is significant commercial usage of BellSouth's manual OSS. As the FCC has repeatedly stated, actual commercial usage, not third-party testing, is the most probative evidence of compliance. In the five former South Central Bell states in BellSouth's region, for example, BellSouth processes 20,000 partially mechanized and manual orders for CLECs per month. Because the commercial usage is so high, BellSouth will rely on commercial data and performance data to demonstrate its compliance with the Act for most manual orders and third party testing is unnecessary.

Relationship Management Practices

Q. DID THE GEORGIA TEST INCLUDE RELATIONSHIP MANAGEMENT?

A. No. On page 12-13, Ms. Norris complains that the Georgia test did not include a test of "relationship management" practices. The simple reason for this is because neither the Master Test Plan nor the Supplemental Test Plan, which were approved by the Georgia Commission, called for such a test. Further, as defined by the Georgia Commission, the original intention of the Georgia test was to focus on BellSouth's OSS systems.

The "relationship management" aspect of the CLEC experience was rightfully excluded from a test that was designed to focus on OSS. As in Georgia, "relationship management" practices were not tested in Texas. Please also see Exhibit OSS-79

BellSouth's and KPMG's Roles in the Georgia Test

Q. WAS KPMG FULLY INDEPENDENT?

A. Yes. Contrary to Ms. Norris's statements, which begin on page 20, the Georgia test was fully independent. The Georgia Commission ordered BellSouth to hire credible and reputable firms to conduct the process. To fulfill this mandate, BellSouth hired KPMG, the firm that conducted the third party tests in both New York and Massachusetts. KPMG acted at all times as required by independent auditing standards.

AT&T's suggestion that KPMG was not sufficiently "independent" because "KPMG works for BellSouth" is patently false. (Testimony of Ms. Norris, page 20.) Although KPMG's contract is with BellSouth, KPMG has made clear that it is working for the Commission as well as BellSouth. (See Exhibit OSS-64 to my direct testimony of May 18, 2001, the MTP Final Report at II-1). Furthermore, although KPMG was compensated by BellSouth for its work on the third-party test, this was hardly an arrangement unique to Georgia. Surely, AT&T is not suggesting that it and the other CLECs would have liked to pay for the test? Importantly,

KPMG's compensation in Georgia was based solely on the time spent on the project, and there is no suggestion, let alone evidence that KPMG's conclusions were in anyway influenced by the fact that BellSouth paid KPMG's bills for its third-party testing.

On pages 22-23, Ms. Norris claims that BellSouth designed the Georgia test to its own advantage and tailored the test to target or avoid specific areas. It is important to remember that the test plan for the Georgia test was mandated by the Georgia Commission and drafted based on the parameters set by it. The test managers, first Hewlett Packard, and then KPMG, wrote both the core test documents, the MTP and the STP, and other documentation for the test. Both the Georgia Commission and the CLECs viewed the MTP and the STP. Every version of the plan was filed at the Georgia Commission.

CLEC Involvement in the Georgia Test

Q. WERE THE CLECS INVOLVED IN THE GEORGIA TEST?

A. Yes. On pages 24-26, Ms. Norris of AT&T complains about the level of involvement that CLECs had in the Georgia Test. CLECs have had ample opportunity to participate in the testing process in Georgia. The third-party test was actually commenced in response to a petition filed by a coalition of CLECs, which helped shape the scope of the test. CLECs have had the option to file written responses to each interim status report filed by

KPMG and to participate in weekly conference calls to address ongoing issues associated with the test. KPMG held weekly conference calls with CLECs, conducted numerous CLEC interviews, and posted all exceptions and meeting minutes to a website accessible to all CLECs. In certain cases, it was not practical for KPMG to conduct transactions as a pseudo-CLEC, such as the provisioning of xDSL loops and the ordering of LNP. CLECs supplied test scenarios for the test plan, and KPMG had the CLECs submit selected orders on its behalf (e.g. LNP and xDSL). Finally, CLECs also were given the opportunity by the Georgia Commission to discover the basis for KPMG's conclusions, which included serving voluminous discovery requests and deposing four KPMG witnesses over the course of two days, as well as to cross-examine KPMG's principal witnesses at the May 8, 2001 hearing. At the conclusion of the hearing, all interested parties submitted written comments addressing the test and KPMG's conclusions. In short, CLECs actively were involved the test process.

On pages 24-25 of her testimony, Ms. Norris alleges that KPMG did not consider the CLECs' point of view in conducting its analysis. This is without merit. As I stated earlier, KPMG established a pseudo-CLEC in order to test BellSouth's OSS.

KPMG's Procedures

Q. PLEASE DISCUSS MS. NORRIS'S CRITICISMS OF HOW KPMG HANDLED THE GEORGIA TEST.

A. Ms. Norris, on pages 32-33, and interspersed throughout the remainder of her testimony, complains about the analyses that KPMG performed during the Georgia test. More specifically, she complains about the alleged subjectivity of KPMG's analyses, KPMG's use of aggregations, KPMG's statistical analysis, KPMG's use of professional judgment, and KPMG's reliance on BellSouth's performance measurements and the Georgia Commission's penalty plan.

The CLECs' complaints about KPMG's statistical procedures, particularly those made by Mr. Bell of AT&T, are rebutted in the testimony of Edward J. Mulrow, Ph.D. of Ernst & Young LLP, who is filing on behalf of BellSouth. I have also attached KPMG's *Motion for Leave to Articulate Basis for Statistical Analysis in the GA 271 Test Final Reports*, filed on June 25, 2001 in the Louisiana Public Service Commission 271 proceeding, Docket No. U-22252-E as Exhibit OSS-80, in which KPMG describes its use of statistical analysis during the third party test in Georgia. Note that the statistical test used by KPMG in Georgia is the same that was used by KPMG in the New York third party test of Verizon.

First, I would direct you to the July 24, 2001 testimony of BellSouth's witness, Mr. Varner. Mr. Varner discusses the levels of aggregation used in the Georgia test, and the levels being used in the Phase II of the test, which is ongoing. He also discusses Ms. Norris's remarks about KPMG and its statements to the Georgia Commission regarding performance measurements and penalty plans.

Second, as described by KPMG on pages 3-4 of Exhibit OSS-80, the methods that KPMG used were appropriate:

> The Georgia 271 OSS test was designed and implemented to cover a wide range of products and services. In total, well over 1,000 test points were reported in the eight major test categories: Pre-Ordering, Ordering and Provisioning, Billing, Maintenance and Repair, Capacity Management, Change Management, Metrics, and Flow-Through Evaluation.
>
> In many cases, the measures related to these test points were quantitative, and statistical testing was performed. However, the sample sizes for each specific service or transaction type were not designed for statistical precision. Instead, the timeliness and accuracy issues were generally evaluated at an aggregate level, while functionality was evaluated at the specific level. Functionality tests, for example, do not determine how quickly or how accurately the system is performing a particular service or transaction type.

Instead, functionality tests determine whether the system has the capability of performing the required service.

When statistical tests were used, the purpose was to *inform* KPMG Consulting's professional judgment, rather than to *determine* KPMG Consulting's professional judgment. The statistical test informed KPMG Consulting whether an observed difference could have been the result of random variation, or whether that difference was statistically significant. KPMG Consulting used professional judgment to determine, when a difference was statistically significant, if that difference was substantial enough to have an adverse impact on competition. Thus, the statistical test result, while often a key component in the Satisfied/Not Satisfied decision, was not the only consideration in that decision.

The purpose of the Georgia 271 OSS test was not to determine, for the specific data created by KPMG Consulting, whether standards were being met. The purpose of on-going monitoring efforts is to determine whether BellSouth is performing below a standard for a specific set of data. The Georgia 271 OSS test sought to determine whether the test outcomes were consistent with an OSS that is generally operating at or above an acceptable level, in order to provide CLECs with non-discriminatory service or a meaningful opportunity to compete. As such, random variation in test outcomes were necessarily considered, via statistical testing,

during the OSS test, regardless of whether the appropriate standards were benchmarks or parity measures.

Additionally, on page 5 of Exhibit OSS-80, KPMG stated:

> KPMG Consulting tested an extremely broad array of products and services for functionality. A functionality test addresses whether a particular aspect of the OSS is functioning. Statistical analysis tests are primarily used in areas where timeliness and accuracy are an issue. For that part of the test, rolling up the data to an aggregate level is appropriate, because the system operating on the data is not substantively different for every disaggregation. On this basis, KPMG Consulting did not believe that every disaggregation needed to be subject to statistical analysis.

On page 33, and elsewhere in her testimony, Ms. Norris questions KPMG's use of its professional judgment. The exercise of professional judgment by KPMG in conducting the Georgia test is consistent with the process used in all of the third-party tests conducted by KPMG in the other states that have been approved by the FCC. In each instance where KPMG has been involved in OSS testing, KPMG has used its professional judgment, and it is absurd to suggest that KPMG should have avoided doing so in Georgia. Test targets and their corresponding evaluation criteria provided the basis for KPMG's test. Standards for these evaluation criteria were established by the Georgia Commission in its

June 6, 2000 Order, or, where a standard did not exist, results were evaluated by KPMG using its professional judgment. KPMG also used "its professional judgment with respect to passing or failing, when its judgment is different from what the performance standard states." (See Exhibit OSS-80, page 7).

SUPPORT FOR CLECs

Documentation

Q. DOES BELLSOUTH PROVIDE COMPLETE DOCUMENTATION TO THE CLECS IN COMPLIANCE WITH THE FCC'S REQUIREMENTS?

A. Yes. Mr. Bradbury asserts, on page 125, that BellSouth's support for CLECS is insufficient. BellSouth disagrees. Mr. Bradbury does not offer any evidence to support his claim.

As stated in my direct testimony on pages 31-34 and detailed in Exhibits OSS 25-38, BellSouth provides extensive support to the CLECS through documentation and training for the electronic interfaces and its OSS. Specifically, BellSouth CLEC Training Course Offerings are posted to the web at the Interconnection web site. (http://www.interconnection.bellsouth.com/training/html/info.html). BellSouth strives to make such training and documentation complete, accurate, and up to date in order to meet the CLECs business needs.

Q. DO CLECS HAVE ANY RECOURSE WHEN THEY DETECT THAT THERE MAY BE A PROBLEM WITH BELLSOUTH'S DOCUMENTATION?

A. Certainly. When CLECs detect problems associated with BellSouth's documentation, they should submit a Change Request via the CCP, which is the appropriate forum in which to address this issue.

In summary, BellSouth provides thorough documentation and makes it readily available to CLECs. Additionally, extensive training is available to the CLECS in both of these areas.

Third Party Test of Documentation

Q. DID KPMG ISSUE EXCEPTIONS RELATED TO DOCUMENTATION IN THE GEORGIA AND FLORIDA TESTS?

A. Yes. KPMG has raised various levels of documentation and process issues in both the Georgia and Florida test. To put this in perspective, however, consider that the four volumes of the Local Exchange Ordering (LEO) Guides, the business rules for TCIF 7.0 interfaces, contain approximately 1200 pages, and the BellSouth Business Rules for Local Ordering, the business rules for TCIF 9.0 interfaces, contains approximately 1800 pages (see Exhibits OSS-14 through OSS-17and

OSS-6 attached to my testimony of May 18, 2001). The accuracy and usability of these business rules have been demonstrated by the fact that many CLECs are using these rules to submit orders successfully in Kentucky, as evidenced by the commercial data on UNE and Resold services in BellSouth's region.

Q. MS. NORRIS COMPLAINS THAT BELLSOUTH'S DOCUMENTATION IS INCONSISTENT AND INACCURATE AND THAT THIRD PARTY TEST IN FLORIDA HAS REVEALED EXCEPTIONS IN THIS REGARD. PLEASE COMMENT.

A. On pages 12-13 of her testimony, Ms. Norris makes a broad claim that BellSouth provides inconsistent and contradictory information, although she offers no specifics or substantiation that this is true. In her Exhibit SEN3PT-1, she has made a number of generalized statements alleging that numerous exception issues that were satisfied in the Georgia Test were then opened in the Florida Test. Ms. Norris specifically identified Florida Exception 33 as one of those Exceptions that was opened in the Florida test after having been satisfied in the Georgia test.

As I have explained in Exhibit OSS-79 attached hereto, the Florida test looked at products that were different from the products that were available at the time of the test in Georgia (see the explanation of Florida Exception 41 in Exhibit OSS-79). Florida Exception 33 relates specifically to the Flow-Through Ordering Matrix (BBRLO-12/22/00, sec 2.6), Flow-

Through Parameters (BBRLO-12/22/00, sec 2.6.1), and the BST SQM Plan LSR Flow-Through Matrix (10/00). In response to Florida Exception 33, BellSouth agreed to synchronize the flow-through information between the documents. New products and services and changes to flow-through occur through the natural evolution of BellSouth's development of its business, and CLECs' requests for such changes. BellSouth has addressed KPMG's issues raised in Florida Exception 33, and closure is currently in progress.

Q. DOES BELLSOUTH PROVIDE COMPLETE DOCUMENTATION TO THE CLECS IN COMPLIANCE WITH THE FCC'S REQUIREMENTS?

A. Yes. Mr. Bradbury, beginning on page 126 of his testimony, makes an unsubstantiated inference that BellSouth's general support of the CLECs is insufficient because KPMG did not do a thorough test of the EDI specifications and other documentation that BellSouth provides to the CLECs. However, the fact that it was not tested to AT&T's satisfaction does not automatically make it insufficient. As stated in my direct testimony of May 18, 2001, beginning on page 25 and detailed in Exhibits OSS-4 through OSS-38, BellSouth provides extensive support to the CLECS through documentation and training for the electronic interfaces and its OSS. For example, beginning on page 28 of my direct testimony of May 18, 2001, I describe the complete and accurate information on EDI specifications that BellSouth provides to CLECs. This information is easily

accessible on BellSouth's Interconnection web site.[4] BellSouth strives to make such training and documentation complete, accurate, and up to date in order to meet the CLECs business needs.

Q. DOES THE CCP CONTAIN REQUIREMENTS FOR NOTIFYING THE CLECs OF CHANGES TO DOCUMENTATION?

A. The CCP has contained notification requirements for some time, and BellSouth has been complying with those requirements. Regarding notification intervals that I discussed beginning on page 53 of my testimony of May 18, 2001, BellSouth and the CLEC participants have been discussing a new more comprehensive set of notification deadlines, and a ballot regarding notification intervals was issued to the participants in the CCP on June 21, 2001. The ballots were returned to BellSouth on June 28, 2001. Of the 26 items on the ballot, 24 were items that had direct bearing on the Release Management Schedule process, and 20 of those were approved. The Approved items were incorporated into CCP Document of July 2, 2001, (and they are included in the later CCP document of July 18, 2001, which is attached as Exhibit OSS-81). These notification deadlines within the context of a comprehensive release management program contain schedules for industry releases (new industry standard(s) that may impact and require the entire CLEC community to make changes to their interfaces), major releases (changes that may require CLECs to make changes to their interfaces), minor

[4] http://www.interconnection.bellsouth.com/guides/html/guides_leo4.html

releases (changes that may not require CLECs to make changes to their interfaces), and maintenance releases (scheduled maintenance of a BellSouth system). The results of these two ballots should satisfy AT&T's and MCI/WorldCom's complaints about notification intervals. Because AT&T and MCI/WorldCom (via Mr. Bradbury and Ms. Lichtenberg) complain about these issues in their testimony, it is surprising that neither AT&T nor MCI/WorldCom chose to vote on the ballot that preceded the CCP document of July 2, 2001, nor did they on the subsequent ballot that preceded the CCP document of July 18, 2001. However, these CLECs' lack of participation in the process does not nullify the accomplishments of the CLECs that choose to participate.

Q. MS LICHTENBERG OF MCI/WORLDCOM, ON PAGE 28-29, COMPLAINS THAT CLECS DO NOT RECEIVE DOCUMENTATION SUFFICIENTLY IN ADVANCE OF DEPLOYMENT OF INTERFACE RELEASES. PLEASE COMMENT

A. Ms. Lichtenberg referred specifically to the dates documentation was provided to the CLECs for major releases and industry releases. As I discussed above, the CLECs voted on a new release management schedule that has been incorporated in the latest version of the CCP document. Section 4.0, page 35, of the CCP document (Exhibit OSS-81) provides that:

Major Releases

- Draft User Requirements for major software releases will be provided to CLECs at least 36 weeks prior to production
- Final User Requirements for major software releases will be provided to CLECs at least 34 weeks prior to production
- Final specifications for major software releases will be provided to CLECs at least 10 weeks prior to production
- Business Rules associated with major software releases will be provided to CLECs at least 8 weeks prior to production

Industry Releases

- Notification for the implementation of an Industry release will be provided at least 42 weeks prior to production
- Draft User Requirements for implementation of Industry release will be provided to CLECs at least 40 weeks prior to production
- Final User Requirements for implementation of Industry release will be provided to CLECs at least 10 weeks prior to production
- Final specifications for implementation of Industry release will be provided to CLECs at least 10 weeks prior to production
- Business rules associated with implementation of Industry release will be provided to CLECs at least 8 weeks prior to production

Q. IF THEY DETECT PROBLEMS WITH BELLSOUTH'S DOCUMENTATION, HOW DO CLECs ALERT BELLSOUTH?

A. If a CLEC detects a problem with BellSouth's documentation, it should submit a change request via the CCP, which is the proper forum. And indeed, CLECs are using the CCP to address issues with documentation. In summary, BellSouth provides CLECs with thorough and complete documentation that is readily available.

CHANGE MANAGEMENT

BellSouth's Change Control Process

Q. HAVE AT&T'S COMPLAINTS ABOUT THE CHANGE CONTROL PROCESS ("CCP") ALREADY BEEN ADDRESSED IN ARBITRATIONS THROUGHOUT THE BELLSOUTH REGION?

A. Yes. In this proceeding, as well as in affidavits and testimony filed in 271 proceedings throughout the BellSouth region (AL Docket 25835, LA Docket U-22252, GA Docket 6863-U and KY Case No. 2000-465), Mr. Bradbury of AT&T makes a number of allegations concerning BellSouth's Change Control Process. On pages 95-124 of his testimony, Mr. Bradbury (AT&T) condemns BellSouth's CCP as inadequate, and cites examples of how he feels BellSouth has operated to the detriment of CLECs within that process. The allegations that Mr. Bradbury presents here are nothing new and are unfounded.

Q. WHAT HAS THIS COMMISSION SAID ABOUT BELLSOUTH'S CCP?

A. These are the same issues raised by AT&T in its Petition for Arbitration in Kentucky Case No. 2000-465. This Commission dealt with these issues and ordered, "[n]o change to the CCP is warranted at this time; however, if AT&T believes that the escalation process yields insufficient progress, then AT&T may file a complaint against BellSouth with this Commission."

In addition, the Georgia Commission ordered, "that if the parties have disputes arising from the change control process, they should adhere to the escalation and dispute resolution process included in the change control document." Additionally, the North Carolina Public Utilities Commission, on page 35 of its Order released in Docket No Pub-170, Sub 73, found that it "agrees with the Public Staff that it would be more appropriate to order BellSouth and AT&T to refer the issues that AT&T has raised in this docket to the CCP for further action." Additionally, the North Carolina Commission noted that "…the Public Staff observed that the CCP appears to be steadily evolving in ways that are mutually acceptable to both BellSouth and the CLPs [competing local providers] …" The North Carolina Commission further noted "… the Public Staff opined, it seems unnecessary for the Commission to intervene in a process that appears to be working, even if it is working more slowly than AT&T desires." In contrast, none of the issues raised by Mr. Bradbury in his testimony have been worked through the dispute resolution process of CCP.

Q. FROM PAGE 13 THROUGH PAGE 33 OF HER TESTIMONY, MS. LICHTENBERG (WORLDCOM/MCI) ADDRESSES A NUMBER OF CONCERNS REGARDING BELLSOUTH'S CHANGE MANAGEMENT PROCESS. DO YOU HAVE ANY COMMENTS REGARDING HER COMPLAINTS?

A. Yes. Ms. Lichtenberg's complaints are speculative and/or misleading, and very similar to those of Mr. Bradbury of AT&T. She takes great pains to be specific in her discussion of change requests and areas of purported deficiency in BellSouth's Change Control Process ("CCP"), but her story is woefully incomplete. I will address her claims and show that BellSouth's CCP is a viable change management process that meets standards set forth by the FCC, state commissions and independent third-party test administrators.

Q. HAS THERE BEEN INCIDENCES WHEN ISSUES HAVE ARISEN THAT WERE HANDLED OUTSIDE THE GUIDELINES OF THE CCP?

A. Yes. BellSouth has testified herein and in other proceedings regarding isolated events in which BellSouth acted outside the CCP guidelines. BellSouth acknowledged the situations, and took corrective steps. That should not be translated as an inadequacy of the process itself, nor should BellSouth be depicted as the only violator of process guidelines. Commissions have been perceptive enough to recognize that point. (Ref. Georgia Public Service Commission Docket No. 11853-U, North Carolina

Utilities Commission Docket No. P-140, Sub 73, Kentucky Public Service Commission Case No. 2000-465)

Mr. Bradbury and BellSouth have each recounted virtually the same events within the evolution of BellSouth's change management process. Unfortunately, Mr. Bradbury's recitation of those events continues to reflect AT&T's attitude that, if BellSouth does not respond at all times with solutions that are acceptable to AT&T, BellSouth is non-compliant and the process is inadequate.

The BellSouth CCP is a regional, multi-CLEC process, and BellSouth is responsible to the CLEC community as a whole, and to individual CLECs as practicable. Most CLECs, and the Commissions that have rendered decisions on this issue in BellSouth's region, have demonstrated their understanding of this issue, and are working through the process in a positive manner.

Additionally, upon conclusion of the independent third-party testing in Georgia, KPMG presented its findings on the BellSouth's CCP. In its letter of March 20, 2001, to the Georgia Public Service Commission, KPMG stated that BellSouth's Change Management was but one of the many categories in which “no deficiencies creating potentially material adverse impacts on competition currently exist.” BellSouth provided a copy of that letter (which accompanied KPMG’s final Reports) as Exhibit OSS-67 to my direct testimony filed on May 18, 2001.

On the other extreme, Mr. Bradbury takes issue with virtually every detail or activity of the CCP. While there is disagreement on most every one of Mr. Bradbury's claims, I will limit my comments to only the most seriously misleading of those allegations.

BellSouth's Alleged "Veto" Power

Q. DOES BELLSOUTH AGREE WITH MR. BRADBURY'S ALLEGATIONS THAT BELLSOUTH HAS A "VETO" POWER IN THE CCP?

A. No. On page 98, Mr. Bradbury and Ms. Norris at page 18, lines 13-19 allege "veto" power that BellSouth has within the CCP. BellSouth disagrees with this characterization of a right that is reasonably granted to BellSouth by the CCP, itself. AT&T is a part of the CCP and participated in the development of that document. AT&T's negative vote on the baseline CCP document of August 23, 2000 was overruled by the consensus vote of the CLEC community. BellSouth did not vote, and therefore, it appears AT&T's true issue is with AT&T's lack of control over the entire industry. Please see my direct testimony of May 18, 2001, beginning on page 41, for the history of the development of the CCP process.

As part of the collaborative effort between BellSouth and the CCP community (which means that there are more members than just AT&T),

and where consensus is required to make decisions, BellSouth and the CLECs have made a concerted effort to incorporate all reasonable and technically feasible requests for changes. AT&T apparently feels that BellSouth has no rights as a stakeholder in this process, and should automatically acquiesce to CLEC requests (or voting results), even if those requests (or voting results) 1) fall outside of BellSouth's obligations under FCC orders, 2) are not feasible under BellSouth's current technical capabilities or policies, or 3) require BellSouth to make substantial financial investment for a limited potential utilization by the CLEC community as a whole. By agreement with the CLECs in the process, the CCP plan itself clearly allows BellSouth the right to reject changes that fall under the following criteria:

In instances where BellSouth has declined to adopt a CLEC request – from either a single CLEC, or the CLEC community – the requests have been given appropriate consideration, and a reason for BellSouth's response has been provided through the CCP (under one of the categories described above). If appropriate, that message has been delivered and explained by a BellSouth subject matter expert on the issue. In spite of AT&T's implications otherwise, the CCP document contains provisions describing this review of change requests and subsequent rejection, if warranted.

Additionally, there is a provision for a request that is submitted for a change that is being actively discussed or is on the agenda to be

discussed at the industry's Ordering and Billing Forum ("OBF"). Such a change request will be deferred by the CCP. If, however, the issue is not active and will not be considered within the next six months, and if there is agreement between BellSouth and the CLECs to proceed prior to an OBF resolution, BellSouth will determine if it can support the request.

These criteria are specifically defined in the current CCP Document on pages 29-31. I have included this document as Exhibit OSS–81. I would add that there is currently no change request from a CLEC to alter these terms.

Q. ON PAGE 101, MR. BRADBURY ALLEGES THAT NO COMMISSION HAS RECOGNIZED BELLSOUTH'S CCP NOR ESTABLISHED A MECHANISM FOR HANDLING DISPUTES. IS MR. BRADBURY CORRECT?

A. Absolutely not. This Commission recognized BellSouth's CCP in Case No.2000-465 and agreed that the CCP contains provisions for escalating disputes.

As I discussed on page 59 of my direct testimony, if a dispute arises based upon a BellSouth response, or any other CCP issue, the CCP also contains remedies of escalation and dispute resolution, that include an opportunity for either party to take the issue to the state commission for assistance after all internal escalation efforts within both companies have

failed to produce a resolution. That environment hardly seems to qualify as one in which BellSouth would have any true "veto" power. AT&T has not used the dispute resolution process for even one of the issues raised in Mr. Bradbury's testimony.

Q. ON PAGE 99 LINES 14-15, MR. BRADBURY STATES THAT "BELLSOUTH'S VETO OF THESE SEVEN ISSUES HAS HAD A PERMANENT CHILLING EFFECT ON THE SUBSEQUENT BALLOTING AND CLEC VOTING PROCESS." PLEASE COMMENT.

A. Mr. Bradbury's remark is typically out of context. It is a dramatic attempt to obscure the fact that five of the issues were subsequently passed unanimously by the CCP – including BellSouth – and incorporated into the CCP document, one issue was passed by the CCP – including BellSouth – with only AT&T dissenting – and incorporated into the CCP document, and one issue remains open as BellSouth continues to review it within the CCP. The terms and wording of those issues were approved by vote after collaborative negotiations within the CCP.

Mr. Bradbury would have this Commission believe that BellSouth refuses to approve change requests out of hand, just to be contrary. That is hardly the case, since BellSouth benefits from CLEC-requested changes just as CLECs benefit from BellSouth-requested changes. That notwithstanding, in instances in which BellSouth has had to decline,

BellSouth has been more than willing to fully explain the reasonableness of its decisions.

The CCP itself authorizes BellSouth to review the outcome of the votes in order to determine if BellSouth can implement the change. Specifically in Section 9.0 of the current CCP Document, on page 64, the language reads:

> BellSouth may not be able to support all requested changes to the process as proposed. BellSouth will provide a supporting reason(s) to substantiate its position. A CLEC may seek relief through the escalation process if dissatisfied with BellSouth's response.

The activity related to these seven items reflects what the CCP is truly all about – reaching agreements on issues in a way that benefits the CLEC community as a whole, with BellSouth as a partner, not an adversary. The fact that consensus was ultimately reached on those issues hardly reflects a "permanent chilling effect." And contrary to Mr. Bradbury's exaggeration, voting on issues has continued in a open and responsible fashion to this day.

Mr. Bradbury states on page 99, line18 that BellSouth "did not continue to publish" the CLECs language regarding dispute resolution. What Mr. Bradbury really means is that BellSouth did not continue to publish AT&T's desired version of the language regarding dispute resolution. BellSouth considers this issue to be resolved in that the language in Section 8.0 of

the current CCP Document (Dispute Resolution Process) reflects the requirements of both CLECs and BellSouth, to the extent that BellSouth can support such requirements. BellSouth has agreed to all CLEC requests in this issue except one; i.e., BellSouth has stated its inability to support the CLEC request that BellSouth notify all CLECs of any and all pending arbitrations between itself and a CLEC, or group of CLECs. It is BellSouth's contention that it is the responsibility of the CLEC(s) to provide that notification to other interested parties – not BellSouth's.

Compliance with the requirements of the CCP

Q. HAVE THE CLECs COMPLAINED ABOUT BELLSOUTH'S COMPLIANCE WITH THE CCP?

A. Yes. On pages 100-101, Mr. Bradbury complains about the treatment of BellSouth- and CLEC-initiated change requests. There is no mystery why BellSouth did not submit change requests in 1998-1999. Originally, the EICCP and the interim CCP were envisioned as processes for CLECs only to submit change requests. Over time, as I have already emphasized in this testimony and in my direct testimony of May 18, 2001, the CCP has evolved and continues to evolve. In 2000, BellSouth started submitting its change requests to the CCP as well.

Mr. Bradbury seems to forget that any changes made to interfaces – whether CLEC- or BellSouth-requested – are intended to serve the CLEC

community. Instead it seems to be more important to him to compare the number of CLEC change requests implemented versus the number of BellSouth change requests implemented, while ignoring the content and importance of the change requests themselves. Some change requests, such as Type 6 change requests for defects, simply are more important than others and will have a greater impact. I feel confident that the CLEC community would be happy to see the implementation of a BellSouth change request to remedy a defect or to correct a documentation error that benefits the entire CLEC community, and would not be concerned as to who made the change request. It is true that the Type 6 change requests that BellSouth submitted were not prioritized by the CCP, because the CCP does not require prioritization for Type 6 request. BellSouth is not skirting the CCP by submitting Type 6 change requests.

Q. PLEASE COMMENT ON THE HANDLING OF AN UPDATE TO THE BUSINESS RULES IN 2000.

A. On page 102, line12, Mr. Bradbury claims that BellSouth circumvented the CCP when it implemented BBR Issue 9G, which prevented the CLECs from making their required coding and process changes. That is only partially correct. BellSouth failed to submit this change through the CCP, but, contrary to Mr. Bradbury's claim, BellSouth posted a Carrier Notification letter on August 18, 2000, thus providing all CLECs the requisite notice of this charge. Issue 9G of the BBR was posted at the BellSouth Interconnection Website under Guides on August 31, 2000, to

be effective October 2, 2000. BellSouth did not utilize the CCP process for this implementation because the release was primarily intended to correct defects in documentation that had been previously identified by various CCP members over time, which would not involve any coding changes by the CLECS. A number of these documentation changes were necessary to address exception raised in the Georgia Third-Party Test, with which AT&T was very familiar.

In addition to the documentation changes, there was one minor software change included in the release. As AT&T knows, there was an issue with the software change which was corrected soon thereafter. BellSouth's rationale for going forward with the release of the documentation changes, was an effort to assure that accurate documentation was available for the CLECs. BellSouth is committed to using its best efforts to make this process work.

CCP Process Improvement

Q. DOES MR. BRADBURY QUESTION BELLSOUTH'S HANDLING OF CLEC CHANGE REQUESTS?

A. Yes. On page 104, beginning on line 20 and continuing on page 105, Mr. Bradbury makes allegations concerning the handling of a change request, asking for modification of the change control process, submitted by AT&T. Mr. Bradbury alleges that BellSouth refused to discuss this request in the

CCP Monthly Status meetings, but rather formed a sub-team to manage the request. Mr. Bradbury's allegations are incorrect. BellSouth simply made a suggestion that, because of the scope and magnitude of AT&T's change request for changing the CCP document, it should possibly be handled by a CLEC subcommittee. The suggestion (along with the name 'Process Improvement') received the blessing of the CCP, and BellSouth was also invited to participate. It was decided that a sub-team was needed to review and discuss AT&T's proposed changes and to get other CLEC participants' input and concerns. AT&T's own CCP representative agreed to facilitate the subcommittee. Since the CCP document affects the entire CLEC community (not just AT&T) as well as BellSouth, the idea of a multi-CLEC subcommittee made absolute sense. The CCP Process Improvement sub team is discussed in on pages 48-49 of my May 18, 2001 testimony.

Introduction of New Interfaces

Q. DOES MR. BRADBURY CONTINUE TO RAISE ISSUES THAT HAVE BEEN SETTLED BETWEEN AT&T, SUCH AS WHETHER THE DEVELOPMENT OF NEW INTERFACES SHOULD BE INCLUDED IN THE CCP?

A. Yes. On page 105, lines 5-10 Mr. Bradbury, claims interfaces brought online by BellSouth since the initiation of the CCP have not been included in the CCP. Mr. Bradbury specifically references TAG, the LNP gateway

and the xDSL corporate gateway. This is the same issue raised by AT&T and resolved by this Commission in Case No. 2000-465. Therefore, it is baffling that Mr. Bradbury has chosen to revive it in this proceeding. I will agree that his statement is correct regarding BellSouth's desire to exclude development of new interfaces from the CCP.

First let me reiterate as explained on page 59, line 23 and page 61, line 11 of my direct testimony dated May 18, 2001 that the CCP incorporates the *introduction* to the CLECs of new electronic interfaces. But, the *development* of new electronic interfaces does not come under the CCP because BellSouth must have the flexibility to develop interfaces to meet industry standards and guidelines, and regulatory requirements. This process is described on page 55 of the current CCP document, attached as Exhibit OSS-81.

The process allows for and encourages CLEC input, but new development is too critical to risk being stymied in the process by CLEC disagreement. To ensure efficient and up-to-date deployment of new interfaces, BellSouth must retain ultimate control of their development.

Second, the LNP gateway and the xDSL corporate gateway are not interfaces, but rather are data communications servers – with their own processors and memory – that provide access between processes that use different access protocols. A CLEC uses the BellSouth provided electronic interfaces, EDI or TAG, as the actual interface over which to

pass LNP service requests to the LNP gateway. A CLEC uses LENS, TAG or EDI to pass xDSL service requests, including requests for loop makeup information, to the xDSL corporate gateway. Simply put, these gateways convert the CLEC provided data, and for xDSL services assignment data, into the format expected by BellSouth's downstream systems in order to provision service.

Third, and contrary to the picture Mr. Bradbury attempts to paint, CLECs had a major role in the development of the TAG interface, the LNP gateway and the xDSL corporate gateway. On page 87, lines 16-24 of my direct testimony filed May 18, 2001, I address the role of the CLECs in the development and implementation of electronic ordering of xDSL services. Furthermore, the development of the process flow and business rules for the LNP gateway were discussed and approved during meetings of the Southeast Region LNP Operations Team during 1997 and 1998, in which AT&T participated. This team was formed prior to implementation of LNP and was attended by CLECs, including AT&T, Local Exchange Companies, including BellSouth, and Independent Telephone Companies.

BellSouth accepts change requests through the CCP for enhancements and/or defect corrections to the process of issuing services request for LNP and xDSL services. Some of those change requests will appropriately affect the LNP gateway and the xDSL corporate gateway.

Finally, CLECs had a major role in the development of the TAG interface. Several CLECs, including AT&T, participated in the industry Electronic Communications Implementation Committee ("ECIC") Steering Committee when the industry standards for TAG were determined. ECIC is a subcommittee of ATIS dealing with electronic bonding – electronic exchange of information. On October 31, 1997, the ECIC "recommended" that the Ordering and Billing Forum ("OBF"), another subcommittee of ATIS, create CORBA formats for local service request pre-order validation.

When BellSouth began working on the TAG interface, BellSouth convened a focus group for interested CLECs in March 1998 at which documentation was distributed and CLECs were given the opportunity to provide input. BellSouth also offered interested CLECs the opportunity in early 1998 to become TAG early adapters. Three companies requested to be TAG early adapters (Beta testers). BellSouth held 8 training sessions for early adapters and any interested CLEC for pre-ordering and ordering. As stated on page 72, lines 20-21 of my May 18, 2001 direct testimony, TAG became subject to change control on August 1, 1999.

Go/No-Go Decision Point

Q. MR. BRADBURY IMPLIES THAT THE LACK OF A "GO/NO-GO DECISION POINT" PROVISION IN BELLSOUTH'S CCP MAY FORCE

THE CLECS TO CUT OVER TO A NEW RELEASE PREMATURELY. IS THIS TRUE?

A. No. On page 107, lines 12-17, Mr. Bradbury implies that the CCP has no provision entitled 'go/no-go decision point' to "ensure that CLECs are not forced prematurely to cut over to a new release." While I will agree only that the BellSouth CCP does not have a provision entitled "Go/No-Go Decision Point," as does another Bell Operating Company, BellSouth's CCP employs a different process to accomplish the same goal. Contained in the CCP is a notification schedule designed to keep CLECs informed as to the implementation of new interfaces and program release upgrades. As discussed in pages 54-55 of my testimony filed on May 18, 2001, BellSouth and the CLECs were discussing a release management schedule as part of the process improvements for the CCP. The CLECs voted on this schedule in June 2001, and the new schedule has been incorporated into the latest version of the CCP document, which is attached as Exhibit OSS-81 The release management schedule has increased the amount of advanced notification for the CLECs that occur before the different steps in the deployment of new releases of the interfaces.

I will also point out that BellSouth maintains support of two (2) versions of industry standard interface programs and does not force CLECs to switch. That is another protection for CLECs who may not be ready to migrate to a new industry standard interface. Despite Mr. Bradbury's implications

regarding BellSouth's lack of a specific Go/No-Go provision, this Commission should not be misled that BellSouth's CCP does not offer protection against a premature cut-over.

Cooperation with CLECs in Implementing Change

Q. AT&T AND MCI/WORLDCOM CRITICIZE BELLSOUTH'S COOPERATION WITH THE CLECs FOR IMPLEMENTING CHANGE VIA THE CCP. PLEASE COMMENT.

A. Mr. Bradbury says, on page 122, that KPMG did not evaluate BellSouth's "failure to implement changes" [within the CCP process]. Furthermore, Ms. Lichtenberg, on pages 14-21 of her testimony, makes various claims that BellSouth delays CLEC-initiated change requests and she provides an overview of the age of existing requests as "evidence" of such.

Ms. Lichtenberg provides scant information to support her claims. Taking the age of existing change requests in "new" status at face value does not determine whether BellSouth's CCP operates effectively. BellSouth is committed to responding to CRs as quickly as possible, and has 20 days – per the CCP Change Request Review interval – to respond whether it can support a CR. Again, the CCP Change Request Review process is clear that BellSouth can, in fact, reject a CR under certain circumstances (both provisions can be found in the current CCP Document in Section 4.0 –

Change Control Process Flow; Table 4-3, Types 2-5 Detail Process Flow; Step 3 – Review Change Request for Acceptance).

If a CR is rejected by BellSouth, the requesting CLEC can ask that the request be kept in the "new" status until it determines its next step. It is the responsibility of the CLEC to cancel the request, and BellSouth allows ample time for cancellation. Therefore, the fact that some "new" requests remain in that status for lengthy periods of time is due to circumstances controlled by the CLECs – not BellSouth.

For example, AT&T submitted CR0012 in April 2000 (16 months ago) to add TAFI maintenance functionality to the ECTA maintenance interface (TAFI and ECTA are discussed at length in my direct testimony). BellSouth supplied its response to AT&T in June 2000, stating that the request was not valid since AT&T was not currently a user of ECTA (and still is not), and that the rules of the CCP specifically state that a CLEC can not issue a CR on an interface that it is not currently using. Further, BellSouth stated that AT&T could submit a BonaFide Request ("BFR") to BellSouth for custom development work to meet its request, but that AT&T would have to bear all of the development costs – up front. AT&T countered by submitting this CCP issue as part of its interconnection agreement arbitrations around the BellSouth region, and would not agree to allow this CR to be closed. As recently as June 28, 2001, the Florida

Public Service Commission ruled in agreement with BellSouth's response regarding the BFR. Still, AT&T refuses to allow the CCP to close this CR.

MCI itself submitted CR0132 almost 11 months ago. There has been ongoing correspondence with MCI since then, after BellSouth asked MCI to verify if the request was the same as one currently before the industry's Order and Billing Forum ("OBF"). The CCP rules (in the same Section 4.0 cited above) are specific that any matter currently before the OBF will be deferred by BellSouth's CCP until disposition by the OBF. BellSouth asked in June and July 2001 for status by MCI, and MCI again questioned BellSouth's initial response. BellSouth committed to further investigation, but activity such as that keeps CRs in the "new" status.

Another CR still shown as "new" is CR0171, submitted by AT&T in September 2000 (almost 11 months ago). As discussed elsewhere in my testimony, that CR pertains to the ongoing process of changing the Change Control Process itself, as well as the subsequent changes to the CCP document. Because that CR is in progress (for 11 months), and is not the type of CR that reaches closure due to implementation of a feature into a program release, it remains in "new" status. As with the other CRs cited, it is simply wrong to imply that this CR has been delayed.

For the 21 CRs that Ms. Lichtenberg cites, BellSouth met its 20-day response date on 17 of them. Those 17 remain open at the request of the issuing CLEC. This Commission is reminded that the CCP has evolved over this period of time, and BellSouth now consistently responds to CLEC CRs within the 20-day interval. Therefore, Ms. Lichtenberg is wrong when she says “BellSouth has caused delays even in the earliest stage of the change control process.”

It is also Ms. Lichtenberg’s implication that no CLEC-initiated change requests are accepted and/or worked through BellSouth's CCP, and that simply is wrong. She also states on page 15 at line 3 that “for BellSouth requests, such acceptance is a given”. Again, as I will show, Ms. Lichtenberg is wrong.

Since the inception of BellSouth’s CCP, 27 CLEC-initiated change requests for new functionality have been implemented, and 31 BellSouth-initiated change requests for new functionality have been implemented. Additionally, 94 defect corrections (submitted by both CLECs and BellSouth) have been implemented, along with three (3) regulatory changes. Over 420 total change requests have been processed, although a number of CLEC and BellSouth requests were subsequently cancelled. KPMG validated the process, and the reality of 155 total implemented changes validates the actual impact of that process.

There are currently (as of July 19, 2001) a total of 101 change requests existing in various statuses within the CCP. Of that total, 66 are CLEC-initiated, and 35 are BellSouth-initiated (3 of which are regulatory mandates). Here is a further breakdown of those requests as of July 19, 2001.

31 Requests are in **'New'** Status (26 CLEC, 5 BellSouth)

- 11 are being reviewed for acceptance
- 11 have been reviewed and BellSouth has provided reason for inability to support (waiting on CLEC response)
- 4 have been reviewed and denied, and are currently in the appeal process
- 3 have been reviewed and CLECs have asked BellSouth to revisit (will be put into appeal process)
- 1 is under investigation by subject matter expert (BellSouth missed the response interval on this one request)
- 1 is ongoing request currently being worked within the CCP (CR0171 – Modify CCP Document – Issued by AT&T), and is subject of Process Improvement subteam which has been addressing requested changes to the CCP and the Document since late 2000. Five voting ballots and subsequent CCP Document version updates have resulted, thus far.

1 Request is in **'Pending Clarification'** Status (1 CLEC) – Need additional information from CLEC before review for acceptance

0 Requests are in **'Pending'** Status (4 CLEC, 6 BellSouth) – Will be prioritized by CLECs at next Change Review Meeting

3 Requests are in **'Pending'** Status (3 CLEC) – With outstanding issues that need resolution before these can be prioritized

45 Requests are in **'Candidate Request'** Status (28 CLEC, 17 BellSouth) Have been prioritized by CLECs, and are eligible for sizing and sequencing into future releases

11 Requests are in **'Scheduled'** Status (4 CLEC, 4 Defect CRs, 3 Regulatory Requests initiated by BellSouth) – Targeted for upcoming releases

All requests have received at least an initial response from BellSouth via the CCP, and only *one* response to a request missed the BellSouth 20-day response interval. In light of that, and to the extent that some CLECs have expressed concerns that BellSouth has not responded to some stated number of requests, or has consistently missed the 20-day response interval, these claims are without merit.

Q. HAVE ISSUES BEEN HANDLED OUTSIDE THE GUIDELINES OF THE CCP?

Yes, but they have been isolated occurrences. In response to Ms. Norris's statement on page 18, that BellSouth has "implement[ed] changes regardless of industry dissent," BellSouth confirms that there have been isolated occurrences. BellSouth acknowledged, corrected, or resolved each of these occurrences under the oversight of various commissions in the Bellsouth region. This does not mean that the process itself is inadequate, nor should BellSouth be depicted as the only violator of process guidelines. Commissions have been perceptive enough to recognize that point. (Ref. Georgia Public Service Commission Docket No. 11853-U, North Carolina Utilities Commission Docket No. P-140, Sub 73, Kentucky Public Service Commission Case No. 2000-465, Florida Public Service Commission Docket No. 000731-TP)

Q. IN HER DISCUSSION OF INTEGRATION OF PRE-ORDERING AND ORDERING ACTIVITIES, MS. LICHTENBERG SAYS THAT BELLSOUTH "FAILED TO SUBMIT THAT REQUEST [CR0002] TO CLECS FOR PRIORITIZATION." PLEASE RESPOND.

A. Ms. Lichtenberg is not totally correct, but she is misleading. AT&T's CR0002 was submitted as a defect, and was, in fact, on the June 28, 2000 prioritization list under the "Documentation" category. During that meeting, Change Control confirmed that CR0002 also impacted coding changes, and reclassified the request as a feature change. The CLECs, however, requested that this CR remain in the "Documentation" category.

Since that time, BellSouth and the CLECs have agreed upon a new definition for defects.

Third-Party Testing of Change Management

Q. PLEASE DESCRIBE THE SCOPE OF THE GEORGIA THIRD-PARTY TEST REGARDING CHANGE MANAGEMENT.

A. In assessing BellSouth's Change Management process, KPMG conducted the following tests: (1) evaluated overall policies and practices for managing changes to the procedures and OSS necessary for establishing and maintaining effective operations between BellSouth and CLECs (CM-1); and (2) examined the methods and procedures that BellSouth used to develop and release the OSS '99 applications package and supporting documentation (CM-2). KPMG participated in the change management process for approximately a year and a half, which included attending meetings and reviewing the documentation in the process. During the test, KPMG witnessed many changes to the CCP that were developed collaboratively by the CLECs and BellSouth under the CCP. KPMG found that BellSouth had satisfied all of the Change Management evaluation criteria. (See KPMG Final MTP Report, at VIII-A-15 – VIII-A-23 which was filed with direct testimony of May 18, 2001, as Exhibit OSS-64).

Q. ARE AT&T'S CRITICISMS OF THE THIRD-PARTY TESTS OF BELLSOUTH'S CHANGE MANAGEMENT PROCESS IN GEORGIA AND FLORIDA VALID?

A. No. AT&T criticizes KPMG's test in Georgia of BellSouth's change management processes, particularly at pages 116-125 of Mr. Bradbury's testimony, and at pages 15-19 of Ms. Norris's testimony, first by complaining about issues that have been raised during the ongoing test in Florida, and then by addressing the test in Georgia directly.

What AT&T is doing is attempting to question the validity of KPMG's findings on change management by virtue of the fact that BellSouth's change management process is continuing to evolve. However, there is nothing particularly new or controversial about an evolving change management process. As the FCC has noted, "We do not expect any change management process to remain static. Rather, 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. This certainly is the case with BellSouth's process, where, in an effort to address CLEC concerns and to implement recommendations by KPMG, BellSouth's change management process has evolved over time, and BellSouth fully expects that it will continue to evolve in the future. As the process evolves and changes are made to it, there will be issues that arise that must be worked out by the

CCP. These issues are an inherent part of a changing process, and there is nothing negative about this.

Q. PLEASE DISCUSS THE CLECS' CRITICISMS OF THE THIRD PARTY TEST OF CHANGE MANAGEMENT IN GEORGIA.

A. On page 120, lines 12-18 of his testimony, Mr. Bradbury of AT&T is apparently complaining that KPMG did not perform the third party test of BellSouth's change management that AT&T would have wished. Ms. Norris of AT&T makes similar remarks starting on page 15 of her testimony, and so does Ms. Lichtenberg of MCI/WorldCom, starting on page 31 of her testimony.

The exercise of professional judgment by KPMG in conducting the Georgia test is consistent with the process used in all of the third-party tests conducted by KPMG in the other states and has been approved by the FCC. In each instance where KPMG has been involved in OSS testing, KPMG has used its professional judgment, and it is absurd to suggest that KPMG should have avoided doing so in Georgia. On pages 122-123, Mr. Bradbury of AT&T complains that KPMG exercised its professional judgment to conclude that three of the eight evaluation criteria, CM 1-1-2, CM 1-1-3, and CM 1-1-5, related to change management were satisfied. KPMG's judgment has been consistently relied upon by the FCC in its 271 decisions, notwithstanding AT&T's unfounded criticisms.

The following discussion responds to AT&T's criticisms of CM 1-1-2, CM 1-1-3, and CM 1-1-5.

CM 1-1-2 evaluation criteria focused upon the essential elements of the change management process and its documentation. AT&T complains that KPMG used its professional judgment to determine that it was satisfied without retesting it. On March 23, 2001, the Change Control Process was revised to ensure the efficiency of providing notification of Type 1 system outages. The following actions and processes were put in place:

- All administrative responsibilities are managed by one member of the EC Support team. Also, the organization has identified a back-up person to assist when needed. Both the primary and the secondary contact are fully trained on responsibilities.
- The Administrator adheres to a template detailing necessary information for each e-mail notification.
- The Administrator with primary responsibility for E-mail notification submits a daily report to the Manager of EC Support. This ensures that procedures are being followed as expected.
- Every e-mail delivery failure is investigated immediately. The e-mail is re-sent regardless of whether the outage has been cleared. Text is added to the re-sent E-mail identifying that it is a re-send.

CM 1-1-3 focused upon the change management process framework to evaluate, categorize, and prioritize proposed changes. AT&T complains that criterion CM 1-1-3 was "satisfied" before the CLECs voted on the balloted items. The CLECs, however, voted on items related to CM 1-1-3 before the test in Georgia ended. During the February 21, 2001 CCP Improvement meeting, 29 items were added to the ballot subject to the results of a formal vote before being incorporated in the actual CCP document. The formal vote takes place by way of an e-mail ballot. The e-mail ballots were distributed to CLECs on March 1, 2001, with the CLECs being given one week to return the ballot. BellSouth and a CLEC volunteer prepared and reviewed the ballot. The results of this ballot were distributed on March 15, 2001, and the changes were incorporated into CCP document on March 26, 2001. (Exhibit OSS-39 to my direct testimony filed on May 16, 2001) KPMG issued its reports on March 31, 2001. The bottom line is that the required changes have been voted on and are included in the CCP.

CM 1-1-5 states that, "the change management's process has clearly defined reasonable intervals for considering and notifying customers about proposed changes." AT&T complains that KPMG found CM 1-1-5 satisfied before the draft process for intervals was implemented. On February 21, 2001, BellSouth presented its "proposed" Release cycles to the CLECs. The CLECs made several recommendations that BellSouth agreed to add to the document. On March 14, 2001, BellSouth again discussed the Release Management process with the CLECs. On April

25, 2001, BellSouth presented the Release Management process package to the CLECs. Several recommendations were made by CLECs that were incorporated into the final document, and re-distributed to CLECs. On May 10, 2001, the CLECs reached consensus on the Release Management package, although the CCP must still must vote on the process.

Additionally, Mr. Bradbury complains that CM 1-1-3 and CM 1-1-8, which were concerned with prioritization and release management, were closed "prematurely." As discussed above, BellSouth has met with the CLECs on several occasions to discuss prioritization and release management. This has taken place both in face-to-face meetings and on conference calls. BellSouth made a presentation to the CLECs on February 21, 2001 regarding this process. On March 14, 2001, the Release 9.4 Package Meeting was held and these issues were discussed. Contrary to AT&T's assertion, three (3) representatives from KPMG participated in that meeting. On May 10, 2001, the CLECs reached consensus on the Release Management/Schedules document. As I discussed earlier, this schedule has been approved by the CCP participants and incorporated into the CCP on July 2, 2001.

Q. PLEASE DISCUSS THE CLECS' REMARKS ABOUT FLORIDA EXCEPTIONS 12, 23, AND 26.

A. As I discussed earlier, the majority of their complaints stem from the fact that the scope of the tests in Georgia and Florida are different. As discussed above, there is no inherent fault in that fact. It does indicate that BellSouth's change management plan continues to evolve, and there is nothing particularly new or controversial about an evolving change management process. The requirements of the change management will continue to evolve. New intervals and processes to improve change management will be developed and implemented.

In the their testimony (especially, Mr. Bradbury on pages 116-120; Ms. Lichtenberg on page 32; Ms. Norris makes similar remarks), the CLECs' witnesses assert that Florida exceptions 12, 23, and 26 regarding change management serve as "persuasive evidence" that BellSouth is not offering CLECs a meaningful opportunity to compete, and that the observations and exceptions found in the Florida test demonstrate that there are inadequacies in BellSouth's change management process that were not discovered during the Georgia test. These statements are derived from a biased view and are not based upon a thorough review of the observations and exceptions.

Florida Exception 12 states, "BellSouth does not adhere to the procedures for System Outages (Type 1) established in the BellSouth Change Control Process, version 2.0." These procedures were implemented by the CCP in March of this year. Soon after their introduction, KPMG found that the email notifications were not sent in a timely manner. BellSouth posts all

outage notifications to its Interconnection Web site. In addition to posting them on the Web, BellSouth also sends outage notification by email to the CLECs that have requested email notification. (Exhibit OSS-39 to my May direct testimony.)

BellSouth investigated the exception and agreed with the initial audit results. As a result, KPMG retested. BellSouth has disputed some of KPMG's findings from the retest based on when the email outage notifications are sent. The BellSouth Change Control Process guidelines dictate that if the system outage is not resolved within 20 minutes a notification will be provided via email and posted to the website within 15 minutes from the time the outage is verified. BellSouth's investigation shows that 84% of the outage notifications were sent in a timely manner. BellSouth has implemented changes to address other obstacles, and to improve progress to achieve the 97% benchmark level. KPMG will retest this issue as it works through the exception process.

Below, I discuss each issue in Florida Exception 23, which is concerned with the distribution of carrier notification letters associated with the CCP. Contrary to AT&T's opinion, as expressed in Mr. Bradbury's testimony at pages 117-118, BellSouth believes remedied the issues in Florida Exception 23. As of July 19, 2001, and KPMG is closing Exception 23. Final language has been drafted for the CCP document for those issues that require a change to the CCP document, and BellSouth and the CLEC

participants in the CCP must discuss and vote on the language before the exception can be closed.

Florida Exception 23 first identified that the BellSouth CCP document does not clearly define when CLECs are to receive notification of documentation updates, or when they are to receive the actual documentation for system and non-system affecting changes. BellSouth disagreed with KPMG's findings because the CCP document that was current at the time of KPMG's review contained a clear and defined process for documentation updates. The CCP document, version 2.0 dated August 23, 2000, Section 4.0 - Change Control Process Flow, Part 2 – Types 2-5 Process Flow, available on the BellSouth Interconnection Web site, provided that:

- Software Release Notifications will be provided 30 days or more in advance of implementation date;
- Documentation changes for business rules will be provided 30 days or more in advance of implementation date; and
- CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

As I discussed above, a new release management schedule, as part of the process improvements, has been incorporated into the latest version of the CCP document, which is attached as Exhibit OSS-81 The CCP's clearly defined intervals for notification and development of a release

management schedule contradicts Ms. Norris's remarks in page 18, lines 17-18 of her testimony. Additionally, there are no user requirements for maintenance releases.

Florida Exception 23 also stated that a unique Carrier Notification is not issued for each instance of documentation updates. BellSouth corrected this last year. On November 1, 2000, Carrier Notifications for updates to the Local Exchange Ordering Guide, Volume 1 and BellSouth Business Rules for Local Ordering began advising whether the change pertained to documentation only or to electronic and/or manual ordering processes. The specifics of the change are contained in the Summary of Changes that is provided in the CCP document. Also on November 1, 2000, the Summary of Changes began to be provided to the CCP on the same day the Carrier Notification is posted. Electronic interface documentation changes are listed in the Carrier Notification letters for Releases. This notification occurs 30 calendar days prior to the Release implementation date.

Florida Exception 23 stated that the original Carrier Notifications do not remain on the BellSouth Interconnection Web site after revisions have been made. BellSouth disagreed with KPMG that this is a problem. BellSouth's policy has been that when a Carrier Notification letter is revised, an additional letter is generated with a new Carrier Notification number announcing the revision, and detailing items that have been changed. BellSouth's intent was to maintain only current and accurate

information on the Carrier Notification site so that CLECs would not be confused by viewing old or out-of- date information.

However, to address this issue, BellSouth has developed a table for OSS letters that shows the original version of the Carrier Notification letter, its scheduled release dates, and an itemization of all of the release features. The table is attached to the Carrier Notification letter. When any information is revised on a Carrier Notification letter, the information is added to the table attached to the letter.

Florida Exception 23 also stated that Carrier Notifications do not reference Change Request numbers for tracking purposes. BellSouth has corrected this. In January 2001, Carrier Notifications began to reference Change Request numbers for tracking purposes and Change Request numbers began to be included in the Summary of Changes that goes to CLECs through the CCP.

Finally, Florida Exception 23 stated that Carrier Notifications of documentation updates do not state whether the documentation changes will be system or non-system affecting. BellSouth corrected this last year. On November 1, 2000, Carrier Notifications for updates to the Local Exchange Ordering Guide, Volume 1 and BellSouth Business Rules for Local Ordering began advising whether the change pertained to documentation only or to electronic and/or manual ordering processes. The specifics of the change are contained in the Summary of Changes

that is provided to the CCP for distribution to CLECs. Also on November 1, 2000, the Summary of Changes began to be provided to the CCP on the same day the Carrier Notification is posted. As I explained earlier, Florida Exception 23 is in the process of being closed.

Regarding Florida Exception 26, KPMG is currently working with the Florida Public Service Commission to issue a Disposition Statement and to formally close this exception. In pages 118-120 of his testimony, Mr. Bradbury claims that BellSouth has failed to remedy the issues related to Florida Exception 26. Florida Exception 26 stated: "BellSouth does not have a clearly defined process for addressing the expedited release of BellSouth documentation defects." BellSouth disagrees. The process for handling defects is located on pages 44-50, particularly pages 48-50, for information on the handling of documentation defects, in the current CCP document. (Exhibit OSS-81) Additionally, I discussed the CCP process for handling documentation defects on page 57 of my testimony of May 18, 2001. KPMG, with the Florida Public Service Commission, has issued a Disposition Statement and has closed Exception 26. This exception is merely another illustration that the CCP has evolved and will continue to do so.

Contrary to the CLECs' predictions, the few remaining open issues will be resolved, and the CCP process will benefit as a result of the third-party tests in both Georgia and Florida. The very nature of the CCP allows leeway to correct, via consensus vote, any problems that arise between

BellSouth and the CLECs, as the FCC envisioned when it sanctioned the evolutionary process of an active CCP.

BellSouth's Test Environments for CLECs

Q. ARE MR. BRADBURY'S COMPLAINTS ABOUT BELLSOUTH'S TESTING ENVIRONMENTS VALID?

A. No. On pages 111 and 112 of his testimony, Mr. Bradbury complains about the testing environments BellSouth has made available for CLECs. These complaints are unfounded.

The discussion of BellSouth's test environments in my direct testimony of May 18 2001 at pages 63-71, clearly described what is available for CLECs. BellSouth makes two types of environments available to CLECs. The first is used when a CLEC is shifting from a manual to an electronic environment, or when the CLEC is upgrading its electronic interface from one industry standard to the next.

The second environment is available to CLECs that choose to do optional functional testing. This is the new CLEC Application Verification Environment ("CAVE"), that allows a CLEC to perform functional testing on pre-production and post-production releases during the specified period. The required and optional aspects of testing are described in

more detail in Exhibit OSS-69 to my direct testimony filed on May 18, 2001.

On page 112 of his testimony, Mr. Bradbury of AT&T states that BellSouth will not use CAVE to test "minor" releases. Contrary to Mr. Bradbury's allegations, BellSouth will use CAVE to test some minor releases. Minor releases are occasionally referred to as "point" releases. As I stated on page 68, lines 4-6 of my direct testimony of May 18, 2001, BellSouth will determine, based on the functionality in the minor release, whether a minor release would be available for CAVE testing by the CLECs. BellSouth will inform the CLECs through the CCP notification process.

In page 112, lines 10-13, Mr. Bradbury also complains about the lack of testing of the new CLEC Application Verification Environment ("CAVE"), which allows a CLEC to perform functional testing on pre-production and post-production releases during the specified period. On April 7, 2001, BellSouth began carrier-to-carrier beta testing with a vendor that provides TAG interfaces to five CLECs. The testing was successfully completed on April 20, 2001. BellSouth had hoped to perform carrier-to-carrier beta testing of CAVE with EDI with AT&T in May 2001. AT&T, however, was not ready to beta test CAVE until the end of May, at about the time BellSouth had to install release 9.4 in CAVE. BellSouth and AT&T completed preliminary testing for beta testing of CAVE on July 11, 2001. AT&T began functional testing (sending LSRs) for beta testing of CAVE on July 17, 2001. Another CLEC completed preliminary testing for beta

testing of CAVE on July 24, 2001 and began functional testing on July 25, 2001.

As described in Exhibit OSS-82 , CAVE is now available for any CLEC to test functionality of the upcoming July 28, 2001 Release 9.4. The procedures for initiating testing are discussed in page 71, line 18 through pages 69-70, of my direct testimony filed on May 18, 2001. CLECs do not have to perform carrier-to-carrier beta testing of CAVE before using it.

On page 112, lines 13-16, Mr. Bradbury comments on the "communications strategy" used for CAVE. Mr. Bradbury claims that the communications strategy for CAVE is different than that used for production, and therefore, AT&T was unable to beta test CAVE. The Electronic Interface Implementation and Upgrade Communication Plan, Exhibit OSS-83, describes the communications strategy for CLECs that wish to use CAVE. It is the same as that which is used for production by CLECs.

Q. PLEASE COMMENT ON THE CLECs' COMPLAINTS ABOUT CAVE TESTING OF LENS AND ROBOTAG™.

A. Mr. Bradbury of AT&T has complained about the exclusion of LENS and RoboTAG™ from CAVE testing on page 112, line 19 through 114, line 3. BellSouth considered the CLECs' requests to add LENS and RoboTAG™ to CAVE during its development. As described in my direct testimony of

May 18, 2001, particularly on pages 19-23 and page 71 lines 12-15, BellSouth offers CLECs the option of using LENS or RoboTAG ™, which are proprietary interfaces for which BellSouth performs the programming. In other words, when modifications are made to LENS or RoboTAG, all of the programming work is done on the BellSouth side of the interface. CLECs are not required to do any work, and thus there is little to "test" from this perspective. Because both interfaces were developed and are upgraded through BellSouth's internal software development process, BellSouth determined that it would not test LENS and RoboTAG™ in CAVE. BellSouth's response is contained in the minutes for CCP Process Improvement Meeting of February 21, 2001, which is attached as Exhibit OSS-84. As I explained on pages 68-69 of my direct testimony, CAVE was developed under the auspices of the CCP. If the CLECs disagreed with BellSouth's decision to exclude LENS and RoboTAG™ from CAVE, then they should have escalated their dispute through the escalation and dispute resolution processes of the CCP. No CLEC did this.

Q. WERE CLECs ABLE TO PERFORM CARRIER-TO-CARRIER BETA TESTING OF OSS99?

A. Yes. On page 114 of his testimony, Mr. Bradbury alleges that BellSouth did not provide a test environment for beta testing new releases when it implemented OSS99. As I just described, BellSouth recently introduced CAVE. CAVE is used to test new functionality that is added to existing industry standard interfaces. BellSouth's existing environment for testing

new industry standards certainly was available when OSS99, an entirely new industry standard, was introduced. CLECs did have the opportunity to perform carrier-to-carrier beta testing of OSS99, as AT&T well knows (see my discussion of the Georgia 1000 test below). Mr. Bradbury's complaint is that CLECs were not able to beta test new functionality (new releases) to OSS99 before CAVE. BellSouth disagrees. Before CAVE existed, BellSouth indeed provided CLECs with the opportunity to perform carrier-to-carrier beta testing of new functionality to the OSS99 standard as it was added. For example, when BellSouth developed and implemented a new OSS platform to support the electronic pre-order and firm order functionality for mechanized LMU and xDSL in July 2000, BellSouth and CLECs beta tested this new functionality. I discussed this carrier-to-carrier beta test with CLECs on page 87 and page 96 beginning at line 24 through page 98, line 22, of my testimony of May 18, 2001. The carrier-to-carrier beta test of line sharing was described on page 100, lines 3-13 of my testimony of May 18, 2001.

On page 115, lines 4-6, Mr. Bradbury of AT&T claims that BellSouth did not in this filing discuss any of the carrier-to-carrier testing that had occurred between BellSouth and other CLECs. This is incorrect. I discussed carrier-to-carrier testing between CLECs and BellSouth on pages 13-14 and pages 96-98 of my direct testimony of May 18, 2001. Further, I will rebut the testimony of Mr. Gibbs regarding the Georgia 1000 test below.

Third Party Testing of the Test Environments

Q. PLEASE RESPOND TO THE CLECS' COMPLAINTS ABOUT THE THIRD PARTY TESTING OF THE TEST ENVIRONMENT.

A. Mr. Bradbury, On page 112, line 16 of his testimony and Ms. Norris, on page 19, lines 10-11 of her testimony, state that CAVE was not tested by KPMG in the Third-Party Test in Georgia. That is a misleading, but correct narrow statement. CAVE could not be tested during KPMG's test, because it did not exist when the Georgia Public Service Commission approved the Master and Supplemental Test Plans for the third-party test. As I described above, BellSouth began carrier-to-carrier beta testing of CAVE on April 7, 2000, after the third-party test in Georgia, which tested TCIF 7.0 interfaces, ended. I described the "history" of CAVE on pages 66-69 of my direct testimony of May 18, 2001. Importantly, BellSouth offered CLECs an open and stable testing environment even before CAVE was implemented. I mentioned this environment above and describe it on pages 63-66 ("BellSouth's Original Testing Environment for CLECs") of my direct testimony of May 18, 2001. As part of the third-party test, KPMG evaluated this environment and found it satisfactory. (The Supplemental Test Plan ("STP") is attached to my direct testimony of May 18, 2001 as Exhibit OSS-65. STP at VII-A-22 – VII-A-24. KPMG evaluated BellSouth (evaluation criterion CM-2-1-6) to determine if "[f]unctioning testing environments were made available to customers for all supported interfaces." STP at VII-A-24 – VII-A-26. KPMG evaluated BellSouth

(evaluation criterion CM-2-1-7) to determine if "[c]arrier-to-carrier test environments were stable and segregated from [BellSouth] production and development environments. KPMG evaluated BellSouth (evaluation criterion CM-2-1-8) to determine if "BellSouth provided telephone customer support for interface testing to the CLECs (with on-call support available 24 hours a day, seven days a week for emergencies)." In this environment, CLECs perform required testing, such as those that occur when a CLEC is shifting from a manual to an electronic environment, or when the CLEC is upgrading its electronic interface from one industry standard to the next.

On page 112, lines 16-17 of his testimony, Mr. Bradbury of AT&T states that the testing available to CLECs before CAVE has been subject to observations and exceptions in the Florida Third-Party Test. Ms. Norris of AT&T makes similar remarks on page 19 of her testimony. Florida Exception 6 was issued to address the availability of an adequate EDI test environment for CLECs to use when establishing new or new industry standard EDI interfaces, not the CAVE environment. BellSouth has been providing an extensive list of technical details on the environment to the test auditor to satisfy the exception and resolve the issue. BellSouth believes that the environment that it currently provides CLECs allows them a full opportunity to test new releases that impact the processing of their LSRs.

Although KPMG issued this exception in Florida, CLECs certainly are able to build and use their EDI interfaces, as reflected in the data provided on page 92 of my direct testimony filed on May 18, 2001.

PRE-ORDERING

Due Dates

Q. HAS BELLSOUTH SUPPLIED A DUE DATE CALCULATOR IN FULL COMPLIANCE WITH THE FCC'S SECOND LOUISIANA ORDER AND THE GEORGIA PUBLIC SERVICE COMMISSION'S ORDER?

A. On page 42, line 19 through page 43, line 3 of his testimony, Mr. Bradbury of AT&T refers to the FCC's Second Louisiana order of 1998 and its statements about due date calculation. Mr. Bradbury references paragraph 106 of the Second Louisiana Order, October 13, 1998, which in turn references an order by the Georgia Public Service Commission. BellSouth complied with the Georgia Commission's order by providing a due date calculator for resale services in LENS on November 14, 1998 in Release 4.0. Mr. Bradbury recognizes that BellSouth provided the calculator in his comments on page 43, even though he disputes the functionality of the calculator. In the pre-ordering mode of LENS, CLECs view the installation calendar and may obtain an automatically-calculated estimated due date.

On pages 43-45, Mr. Bradbury criticizes the due date calculator that BellSouth has provided to CLECs. As I just explained, BellSouth provided a due date calculator for resale service on November 14, 1998. Following that, BellSouth added functionality for UNEs and continued to enhance the functionality and intervals as retail analogs were determined for those services and UNEs that did not have them. The most recent enhancement took place on June 4, 2001, when BellSouth released functionality for the calculation of due dates for resale services that did not require dispatches and for SL1 loops with LNP and SL2 loops with LNP. Although BellSouth initially encountered some problems with the release that were related to Local Number Portability ("LNP"), those many of those problems have been resolved. BellSouth continues to work on the others.

On page 43, lines 18-19, I do not understand Mr. Bradbury' s statement that CLEC orders fall out for manual handling because of deficiencies with the due date calculator. There are certain resale services and UNEs for which the pre-ordering interfaces do not calculate a due date. These are resale services and UNEs that have been designed to be ordered electronically, but fall out to the Local Carrier Service Center ("LCSC") for manual handling. The due date would be provided on the Firm Order Confirmation ("FOC"). On page 103, line 17 through page 105, line 4 and in Exhibit OSS- 47 of my direct testimony of May 18, 2001, I described these resale services and UNEs. Also, an estimated due date calculation would not be provided in the pre-ordering mode in certain situations, for example, when a CLEC requests 25 lines or more on a single LSR or

when a CLEC expedites an LSR. This also occurs for BellSouth retail. These situations are also described on page 104, line 10 through page 105, line 4, and in Exhibit 47 of my direct testimony of May 18, 2001. It takes some expertise on the part of the CLEC representative, as well as the BellSouth retail representative, to be familiar with the targeted intervals for the products they market so they can provide the best due dates for their customers. There is no magic button to push that will cover every situation. However, I cannot think of any situations in which the due date calculator would cause LSRs to fall out for manual handling. If, for example, a CLEC chooses to expedite an LSR, the LSR will fall out for manual handling. The LSR, however, falls out because the CLEC indicates on the LSR that it is expedited, not because the due date calculator did not function properly. In fact, if a CLEC expedites an LSR, there would be no reason for the CLEC to calculate a due date. If, for example, the CLEC requests one of the services or UNEs that is designed to fall out, the due date calculator is not used, as I just described above.

On page 43, lines 19-20, Bradbury also states that, “when LSRs fall out for manual processing, they lose their place in queue for being assigned due dates.” Due dates for CLECs’ end users will be assigned using the same guidelines as are used for BellSouth’s end users. BellSouth provides service on the desired due date or the earliest available installation date thereafter. Due dates cannot be considered confirmed until a complete and accurate LSR has been entered into BellSouth’s service request processing system. Service requests that require manual handling are

impacted alike whether they originate from a BellSouth retail customer or a CLEC.

On page 43, lines 9-18, Mr. Bradbury discusses exception 116 of the Georgia Third-Party Test. BellSouth corrected the deficiency identified in Georgia Exception 116 where the TAG interface was not providing a due date calculation for one particular combination request, the unbundled loop-port combination. BellSouth determined that the loop-port combination request was inadvertently omitted from the product category field. On December 11, 2000, BellSouth submitted a change request CR0237 that included the workaround to modify a due date module for UNE-P. The change request was validated as a defect and a workaround was provided to the CLECs and BellSouth indicated that this would be corrected in a future release. The workaround enabled a CLEC to submit a calculated due date transaction for REQTYPE M Loop/Port Combo by populating the RSPROD field of the LSR with 31 or 32. This interim solution was communicated to all TAG users via the change request CR0237. BellSouth also provided notification of the interim solution to the CLEC community via a carrier notification letter on December 12, 2000 (revised December 29, 2000).

KPMG re-tested the interim solution by submitting calculated due date pre-order transactions for unbundled loop-port combination customers by following the rules outlined in the BellSouth interim solution. All of the re-test transactions were successfully processed by BellSouth's TAG

interface. KPMG determined that “utilizing this workaround, BellSouth’s pre-order interface adequately provides functionality to process Calculate Due Date pre-orders for Loop-Port Combination service requests”. KPMG validated that the solution put in place at the time of the third-party test in Georgia was satisfactory and provided the functionality for CLECs for due date calculation for this one of many pre-order types. As a result of re-test activities, KPMG, with the concurrence of the Georgia Public Service Commission, closed Georgia Exception 116.

Also on page 44 and in footnote 40, Mr. Bradbury comments on change requests CR0237 and CR0313, which are related to exception 116. As BellSouth was developing the requirements to fix the defect identified in CR0237, it became evident that the fix envisioned for CR0237 would only address specific request types. BellSouth needed to submit a separate change request to address all requests types. Hence, CR0313 was opened and was treated as an expedited feature. The CCP communicated this to the CLEC community and received no objections. An explanation for this feature was also provided in Carrier Notification SN91082236, posted February 19, 2001. Consequently, because CR0313 fixed the defect identified in CR0237, and the remaining fix would occur in the June 4, 2001 release, BellSouth agreed to cancel the original change request CR0237. CR0313 was originally posted on the CCP website as a new change request; however, when implemented, the web support personnel deleted it from the folder, but failed to move it to the “Implemented Folder”. This was corrected on June 7, 2001. However,

CR0313 was always reflected on the Change Control Log used by the CLEC team from the beginning. It is now on the Change Control Archive Log.

Q. DOES BELLSOUTH CHANGE MCI'S DUE DATES?

A. No. Ms. Lichtenberg, on page 10, describes an isolated issue that has arisen regarding changed due dates on MCI/WorldCom's FOCs. The BellSouth account team and MCI/WorldCom are jointly working to resolve this issue.

CSRs and Parsing

Q. DOES BELLSOUTH PROVIDE THE CLECS WITH NONDISCRIMINATORY ACCESS TO CUSTOMER SERVICE RECORD DATA FOR PARSING?

A. Yes. On pages 36-42, Mr. Bradbury (AT&T) states his views that BellSouth does not provide nondiscriminatory access to Customer Service Record ("CSR") data while it has fully integrated the receipt and transmission of CSR data within its own retail pre-ordering and ordering operations. Mr. Bradbury is trying to convince this Commission that BellSouth provides more useable CSR information to its retail operations than it does to CLECs. I disagree, and will further demonstrate to this Commission that BellSouth is currently in compliance with FCC

requirements, and that other enhancements under development by BellSouth will go beyond such requirements.

As I discussed in my direct testimony of May 18, 2001 on page 82, BellSouth does provide CLECs the ability to parse information on the CSR, using the integrateable machine-to-machine TAG pre-ordering interface, and the same data stream that BellSouth provides to its retail units. With that stream of CSR data that is supplied to a CLEC, the CLEC can parse to the same line level – using the same unique section identifiers and delimiters – that BellSouth does for itself. Some CLECs have made the business decision to parse CSR information beyond that level, but I reiterate from my direct testimony of May 18, 2001, that this higher level of parsing can be programmed by the CLECs on their side of the interface at this time (if they choose to do so), as BellSouth has done for its retail operation.

Mr. Bradbury on page 38, lines 8-12, and Ms. Lichtenberg, on pages 21-22,quote the same FCC excerpt from the Bell Atlantic, New York Order regarding parsing that I included in my original testimony. I further reiterate the FCC's confirmation (in Footnote 413 of the FCC's Southwestern Bell Telephone, Texas Order) that its statement in that Bell Atlantic excerpt did not require a Bell Operating Company to perform parsing on its side of the interface. Therefore, BellSouth clearly complies with the requirement to provide nondiscriminatory access to CSR information and meets the FCC's requirements.

In spite of the clarity of that Texas 413 Footnote, Ms. Lichtenberg on page 22, line 3 cites Para. 153 of that same Texas 271 order to somehow justify her claim that BellSouth *should* provide more than the current parsing capability. Her argument is flawed because the cite she offers is totally out of the context of this discussion of parsing. Paragraph 153 is specific to the sub-issue of parsing *address* information, not the general issue of nondiscriminatory access to CSR information and BellSouth's current compliance with FCC requirements.

Mr. Bradbury states, at page 42, lines 2-3, that CLECs cannot electronically populate the LSR using the CSR data that is provided by BellSouth. Whether or not a CLEC can use the CSR information provided by BellSouth to the degree that a CLEC might prefer is determined by its own business decision regarding the programming of the higher level of parsing on its side of the interface. Even though Mr. Bradbury says at page 40, lines 17-18 that this purported "lack of CSR parsing functionality significantly reduce the level and reliability of integration that CLECs can achieve," CLECs have the capability for self-determination in that regard. BellSouth is in compliance with FCC requirements by providing the same CSR data stream to CLECs as is provided to BellSouth retail.

On page 42, lines 4-5, Mr. Bradbury of AT&T notes that the Third-Party Test in Georgia revealed incompatibility between Pre-ordering and ordering data requirements. Mr. Bradbury refers to the "Integration Test

Evaluation Criteria and Results" from the Georgia Third-Party Test. (See the pages V-A-28 through V-A-31 of the MTP report, filed as Exhibit OSS-64 to my direct testimony filed on May 18, 2001.) Although some inconsistencies were found during the test, all evaluation criteria related to this part of the test were satisfied and closed. KPMG noted that, in some instances where the pre-order and order fields did not agree, the data returned on the pre-order responses was still adequate for the order field requirements. In order to provide more information on the relationship between the pre-order and order fields, BellSouth published the Pre-Order to Firm Order Mapping Matrix on March 30, 2001 (Exhibit OSS-63 to my direct testimony filed on May 18, 2001). For disagreement between the "Address Validation Queries" and other fields, BellSouth has opened a feature to close the gap between the field size/length between pre-order and order fields. This feature has been associated with change request CR0369, which is the change request AT&T has made for a more robust form of parsing. I will discuss that next. Again, all of the KPMG evaluation criteria related to this matter were satisfied and closed. As I described in my direct testimony filed on May 18, 2001, many CLECs have successfully integrated the pre-ordering and ordering interfaces.

At pages 39-40, Mr. Bradbury and Ms. Lichtenberg, on page 22, provide a chronological view of a more robust version of parsing that is under development within BellSouth's Change Control Process. In general, I do not disagree with the chronology in Mr. Bradbury's or Ms. Lichtenberg's accounting of the development process, and I have discussed the same

events in my previous testimony in this proceeding. However, there are some mischaracterizations that I would like to correct.

First, I would like to reiterate that BellSouth's current access to CSR information, and what BellSouth provides to the CLECs from a parsing standpoint, is nondiscriminatory. Therefore, it should be clear that this development is a response in an effort to accommodate a CLEC's (AT&T) change request and goes beyond what is required under the Telecommunications Act.

It is clear that Mr. Bradbury has concerns about the length of time for development of this version of parsing. It is important for this Commission to understand that, despite the existence of industry standards for this service, such standards are merely guidelines that may or may not cover all situations likely to affect CLECs or BellSouth. Such is the case with parsing. The programming complexities and system interdependencies for this particular development preclude a simple implementation of industry standard parsing. While the standards provide a good basis for BellSouth, there are specific CLEC and BellSouth issues to be addressed that are not parts of the "standard" package.

I take particular exception to Mr. Bradbury's statement at page 39, lines 21-23, that "BellSouth unilaterally downgrades the change request for CSR parsing functionality to Subteam being formed to perform planning and analysis during 2000'." I have provided minutes from the October 19,

2000 Parsed CSR Kickoff Meeting (Exhibit OSS-85 showing that the decision to develop a sub-team was made jointly with the CLEC members of the CCP, including AT&T's own representative. BellSouth has targeted CAVE testing of parsing to be available on December 17, 2001 and an implementation date of January 14, 2002.

As I state above, industry standards do not always address all necessary requirements. A number of additional CLEC requirements for parsing were identified after the formation of the sub-team, and all of them did not fit within the standards requirements. If anything, and notwithstanding the extended development time, the formation of the sub-team has been beneficial to CLECs in that a more comprehensive parsing package that will go beyond parity will ultimately be developed.

BellSouth would prefer that implementation could be more timely, but the activities of the sub-team, as well as those of BellSouth and its programming vendors, have dictated the pace of this project.

LOOP MAKEUP

Q. DOES MR. BRADBURY INCORRECTLY DESCRIBE THE AVAILABILITY OF LOOP MAKEUP INQUIRY AND THE TESTING ENVIRONMENT?

A. Yes. Mr. Bradbury, on page 111, lines 3-4, alleges that , "…enhancements to loop makeup inquiry responses supposedly

implemented in 9.0 are only available in selected areas." I do not agree with Mr. Bradbury. When Loop Makeup inquiry ("LMU") functionality was deployed in November 2000, it had no known defects. When BellSouth added enhancements in January 2001, defects were identified. These defects delayed the deployment of LFACS 27.0 software on a region-wide basis coincident with the other OSS enhancements associated with Release 9.0. The delay of the LFACS 27.0 software did not result in any loss of existing functionality but did delay the return of the new data elements. This was corrected on a region-wide basis by March 31, 2001, and the Release 9.0 enhancements are available everywhere.

Mr. Bradbury claimed, on page 114, line 22, that BellSouth has placed a number of software releases into production which have contained defects that negatively affected CLEC operations and required immediate corrective action by BellSouth. Mr. Bradbury specifically referred to electronic pre-order functionality associated with loop makeup queries. I do not agree with his claim. On January 27, 2001, as part of Release 9.0, two enhancements of functionality were made to Mechanized LMU. These enhancements were made in a beta test environment. During that beta test, BellSouth identified three defects that were associated with the LMU functionality. BellSouth immediately opened Change Requests ("CRs") via the CCP as defects were identified.

All three of these LMU defects were considered minor enough by both BellSouth and the beta test partners that the new functionality associated

with Release 9.0 was implemented into full production on February 12, 2001, with the known defects. BellSouth was able to take immediate corrective action because the defects were so minor.

Finally, and most importantly, actual commercial usage demonstrates that BellSouth's interfaces allow CLECs access to loop makeup information. On page 88 of my direct testimony filed on May 18, 2001, I included the number of loop makeup inquiries that were made by CLECs for December 2000 through March 2001. **The numbers of loop makeup inquiries for April 2001 through June 2001 are:**

Month	# Submitted Regionally	% Within 5 Minutes	% Within 1 Minute	# Submitted in KY	% Within 1 Minute in KY
April 2001	4565	100%	96.3%	120	96.7%
May 2001	3685	100%	98.7%	50	100%
June 2001	5005	100%	99.2%	118	100%

In Kentucky, CLECs sent 19 fully mechanized LSRs in April 2001, 29 fully mechanized LSRs in May 2001, and 13 fully mechanized LSRs in June 2001 for xDSL loops.

Q. DOES BELLSOUTH PROVIDE NONDISCRIMINATORY ACCESS TO LOOP MAKEUP INFORMATION IN KENTUCKY?

A. Yes. Since November 18, 2000, CLECs have had nondiscriminatory electronic access to loop makeup information that is contained in the LFACS database. This functionality is provided via the

Telecommunications Access Gateway ("TAG"), RoboTAG™, and the Local Exchange Navigation System ("LENS") electronic interfaces. CLECs access loop qualification information to determine whether a BellSouth customer qualifies for Fast Access® service is obtained from LFACS. This request is processed in substantially the same time and manner as for a similar BellSouth service inquiry for its own customer as part of the ordering and provisioning process. If a CLEC determines that it needs additional information that is not available electronically, the CLEC can request a manual loop makeup request. Personnel in BellSouth's Outside Plant Engineering department must then retrieve the data from the paper records, or plats, manually whether the request relates to a BellSouth customer or to a CLEC customer.

Q. ON PAGE 4-5 OF HIS TESTIMONY, DOES MR. FELTON IMPLY THAT CLECS CAN QUALIFY A LOOP FOR PROVISION OF SERVICE THROUGH THE CFD IN KENTUCKY?

A. Yes, but he is incorrect. The Corporate Facilities Database ("CFD") does not exist in Kentucky. The CFD is available only in North Carolina, South Carolina, Georgia, Florida and 13 wire centers in Alabama.

Accordingly, BellSouth disagrees with the conclusion of the North Carolina Utilities Commission's ("NCUC") order in NCUC Docket No. P-100, Sub 133d that is cited by Mr. Felton on page 4, lines 15-20 of his testimony.

BellSouth has submitted Exceptions to the Report and Recommended order issued by the NCUC, requesting that it be modified.

ORDERING

Mechanized Ordering for Local Number Portability ("LNP")

Q. CAN BELLSOUTH ADEQUATELY PROCESS ORDERS FOR LNP IN A MECHANIZED MANNER?

A. Yes. On page 16 of her rebuttal testimony, Ms. Berger of AT&T discusses processing orders involving Local Number Portability ("LNP"). As stated in Carrier Notification 91082397 dated May 21, 2001, supplemental electronic LNP LSRs, for other than due date changes on port-out only (Requisition Type C) LNP LSRs, are not eligible for electronic flow-through. In other words, while these LNP LSRs may be submitted electronically, they are processed by the LCSC on a planned manual fallout basis. Specifically, Ms. Berger states that 91% of AT&T's loop and port orders were processed as partially mechanized or manually. An assessment of this data reveals the AT&T division that Ms. Berger discusses in her affidavit primarily focuses on Complex LNP LSRs, which requires manual handling. Another AT&T division that also processes LNP LSRs, which were *not* predominately Complex LNP LSRs, had an 86.76% flow through rate in June 2001. BellSouth will continue to work

with CLECs to implement further LNP mechanization as requested and as technically feasible.

Mechanized Ordering for Line Splitting

Q. ON PAGE 21, MR. TURNER COMPLAINS THAT BELLSOUTH DOES NOT PROVIDE ELECTRONIC OSS FOR CLEC LINE SPLITTING. PLEASE COMMENT.

A. BellSouth stands ready to accept manual line splitting orders today. BellSouth continues to work with the BellSouth/CLEC Collaborative ("Collaborative") to facilitate and improve the ordering process.

As required by the Georgia Public Service Commission in Docket No. 11900-U, BellSouth is currently developing a mechanized ordering capability and anticipates having it ready in time to meet the deadline of the Georgia Commission Order, which is 6 months from June 11, 2001. A precise implementation schedule will be filed with the Georgia Commission next month.

Operator Services/Directory Assistance ("OS/DA")

This is the same issue raised by AT&T in its petition for Arbitration in Case No. 2000-465. This Commission dealt with this issue and no point would be served in repeating the same arguments here.

Flow-Through

Q. DOES MR. BRADBURY OF AT&T CONTINUE TO CLOUD THE ISSUE OF FLOW-THROUGH WITH IRRELEVANT AND INACCURATE INFORMATION AND ACCUSATIONS?

A. Yes. In this proceeding, as well as in affidavits and testimony filed in 271 proceedings throughout the BellSouth region. (AL Docket 25835 and LA Docket U-22252), Mr. Bradbury of AT&T makes a number of allegations concerning BellSouth's flow-through reporting.

This discussion is merely a continuation of the same argument made numerous times in numerous proceedings by Mr. Bradbury on the subject of flow-through, where he clouds the issue with irrelevant concepts, inaccurate calculations and inappropriate comparisons, all to reach an incorrect conclusion. Flow-through is not that difficult a subject, and – by relying on the FCC's current view of flow-through-I will explain that BellSouth is clearly in compliance with its obligations relating to flow-through of CLEC requests.

In his explanation of flow-through (at page 51, lines 2-4), Mr. Bradbury suggests that "for the sake of simplicity," it is OK to use the term 'local service request' (or 'LSR') to denote both CLEC and BellSouth retail transactions. While that might make it easier for him, it masks a simple fact – and underlies the fundamental flaw in his argument – that BellSouth

does not issue LSRs. As described below, this process is inherently different from the way BellSouth has historically generated and submitted service orders. This difference, while not great, does lead to dissimilarities in the ordering process that Mr. Bradbury greatly exaggerates. The FCC has recognized that there are differences in these ordering methodologies. These differences do not result in a finding of non-compliance with the BOC's obligations to provide nondiscriminatory access to its OSS. (See FCC 99-404 for Bell Atlantic, New York, at Footnote 488.), FCC 00-238 for Southwestern Bell Telephone Company, Texas, at Para. 180 and, more recently, in FCC 01-130 for Verizon, Massachusetts, at Para.79.) In those orders, the FCC has held that nondiscriminatory access does *not* even require that all service requests be submitted electronically in the first place. The real issues – that Mr. Bradbury would prefer to avoid – are: a) that submission of service requests is done in substantially the same manner, whether LSRs are for CLECs, or service requests are for BellSouth's retail unit; and b) BellSouth's flow-through calculation methodology has been upheld time after time. Further, there is absolutely no requirement that CLEC and BellSouth ordering processes must be identical, as by their very nature across the nation they are not.

He later suggests that both CLECs and BellSouth "transmit" LSRs. I reiterate that BellSouth's own service requests are not submitted via the "LSR" method, and, consequently, there is a fundamental difference in the CLEC and BellSouth request submission processes. CLECs "transmit" LSRs via interfaces (e.g., LENS, TAG, EDI) that are converted by

BellSouth systems from an accepted industry-standard Order and Billing Forum ("OBF") LSR format to a BellSouth Service Order Communication System- ("SOCS") readable format so that BellSouth service orders can be created. The LSR process was implemented as a result of OBF decisions where the industry decided that it would be advantageous for CLECs to have a single LSR process that could operate nationwide. This Allows CLECs to submit requests on the same form throughout the country. On the other hand, BellSouth retail service requests are "input" into its own interfaces that build the requests in a SOCS-readable format for service request submission. This Commission should not be misled by Mr. Bradbury's attempt to simplify for convenience a difference that affects not only how flow-through can be viewed, but that which, as I mentioned above, is the reason there is even a CLEC issue over measuring flow-through in the first place.

The LSR step is the difference in the ordering processes, but, that difference notwithstanding, the FCC has accepted that the processes function in substantially the same manner. Mr. Bradbury should do likewise. I will add that in a recent Florida Public Service Commission ruling in the BellSouth/AT&T arbitration (Docket No. 000731-TP), the Florida Public Service Commission said "we agree with BellSouth that because the same processes are in place for both ALEC and BellSouth retail orders, the processes are competitively neutral."

Both Mr. Bradbury and I quote the same excerpt from the FCC's Second Louisiana Order regarding flow-through, yet Mr. Bradbury states in other 271 proceedings that I have "inappropriately broaden[ed] the FCC's definition by adding pre-ordering activities, which have nothing to do with flow-through," and he implies that I have developed my own definition of flow-through. Mr. Bradbury's implication notwithstanding, and as he knows, he and I actually agree on the basic definition of flow-through. Further, my additional words were not intended to add to or otherwise re-define the FCC's statement – nor do they include pre-order activities. However, the words that Mr. Bradbury suggests are inappropriate underscore once again that there are activities involved in issuing CLEC service requests or BellSouth retail service orders that are manual in nature, but that occur after pre-order activities. That is where Mr. Bradbury and I disagree, but for him to further suggest that "confusion of pre-ordering activities with ordering and flow-through permeates [my] testimony" is patently misleading.

As I described in various points in my direct testimony, such non-pre-order manual activities are prevalent primarily with complex orders, and are not pre-order activities in the strict sense of the pre-order definition. Rather, it is work that must be done by the CLEC or BellSouth service representatives after gathering the pre-order information. These activities are done by both the CLEC and BellSouth service representatives prior to submissions, or the "hit the send button" phase of ordering, as Mr. Bradbury terms on page 51, lines 12-13. Mr. Bradbury himself

acknowledges the fact that “it is impossible to completely automate the pre-ordering process” (page 51, line 22), but his flaw is suggesting that all of the manual activities done prior to submission are strictly pre-order activities, and alleging that I am confused. That simply is not accurate, and I stand by my direct testimony on the matter.

In other 271 proceedings, Mr. Bradbury states that BellSouth has “chosen an unnecessarily complex way of linking its OSS interface gateways, thus increasing the likelihood of fallout thru [sic] no fault of the CLEC. His statement is not an appropriate characterization of BellSouth’s interfaces. Mr. Bradbury's sweeping overstatement is unfounded, despite his claim of “long experience with this issue and knowledge of the suite of hardware and software BellSouth has deployed.” Over time – since the passage of the Telecommunications Act of 1996 – services that can be ordered electronically by CLECs have progressed from the simple resale of dial tone to a host of offerings for designed services and number portability . It is ludicrous for Mr. Bradbury to suggest that every type of service can be easily inserted into existing processes without certain changes to existing interfaces, or the development of new interfaces (and, possibly, OSS). As examples, local number portability (“LNP”) xDSL and UNE-P – along with all of their associated variations and interdependencies – are not drop-in services that easily fit existing processes and OSS, and extensive work was required to develop the business rules and processes to allow ordering and provisioning.

Given the circumstances of the complexities of the types of services and the system interdependencies created, BellSouth has designed efficient CLEC service request processes, adhering to both industry standards and FCC requirements.

Also on the subject of requests falling out for manual processing, on page 56, line 22-23, Mr. Bradbury states that “designed manual fallout is totally and solely within BellSouth’s control.” Mr. Bradbury is implying that BellSouth intends to harm CLECs by limiting the availability of the number of services that flow-through. Nothing could be further from the truth. BellSouth is committed to providing flow-through on as many types of CLEC service requests as is practical, for exactly the reasons stated by Mr. Bradbury, beginning on page 57, line 10 attesting that lack of flow-through can be detrimental to CLECs and BellSouth alike.

Realistically, however, flow-through on all service requests is not practical or possible. BellSouth has defined and published to various regulatory commissions the types of service requests that do not flow through, as well as the supporting reasons for such. Some of those reasons include: service requests on accounts for which there is a contractual payoff involved; expedites based upon CLEC requests; types of service requests for which there is a low volume, but a high cost to program for flow-through; and, service requests that cannot easily be programmed for flow-through for technical reasons, such as complex services.

These practical problems impact BellSouth's retail processes as well. What decision-making BellSouth uses to determine what types of service requests can flow-through is the result of logical business decisions, within a very narrow list of categories. In making these decisions, BellSouth has ensured that processing of service requests is done in substantially the same manner, whether LSRs are for CLECs, or service requests are for BellSouth's retail unit.

The FCC understands and, more importantly, accepts that all CLEC service requests do not flow-through. In cases where the FCC has granted long distance relief to a Bell Operating Company ("BOC"), the FCC has recognized that some service requests could be properly designed to fall out for manual processing (see FCC 99-404 for Bell Atlantic, New York, at Footnote 488, FCC 00-238 for Southwestern Bell Telephone Company, Texas, at Para. 180, and, more recently, FCC 01-130 for Verizon, Massachusetts, at Para.79). In those orders, the FCC has held that nondiscriminatory access does not require that all service requests be submitted electronically in the first place.

Furthermore, this Commission clarified in its Reconsideration Order in Case No. 2000-465, that "the interfaces used by CLECs must be electronic if BellSouth can handle the identical order electronically for itself. If, however, BellSouth utilizes manual processing for the same type of order for its own customers then it may utilize manual processing for a CLEC's customers orders."

On page 56, line 17, Mr. Bradbury has attacked BellSouth's method of calculating flow-through. Mr. Bradbury has for years had a problem with BellSouth's exclusion from the flow-through rate calculation any CLEC service requests that are designed to fall out for manual handling, even though BellSouth's methodology has been upheld time after time. BellSouth calculates the flow-through based upon the information contained in a letter from the FCC's Common Carrier Bureau Staff in February 1999 ("Strickling Letter" provided as Exhibit OSS-86 . Bureau Chief Lawrence Strickling, in an interpretation of the FCC's BellSouth Second Louisiana Order, confirmed in Section 1 that BellSouth could exclude manually handled complex orders from the flow-through calculation as long as BellSouth could show that its process is nondiscriminatory. Specifically, the Strickling letter states that BellSouth may exclude complex orders if it provides "(1) a clear definition of complex orders for CLECs and BellSouth; (2) a demonstration of how BellSouth handles complex orders for its retail customers and CLECs; (3) evidence that complex orders are processed in a nondiscriminatory manner (i.e., performance results and analysis)." BellSouth has provided this information in my direct testimony of May 18, 2001, in BellSouth witness, Alphonso Varner's testimony of May 18, 2001, and in BellSouth monthly filings of performance data. The FCC realizes that it is not appropriate to negatively tax system flow-through for that which the system has not been designed to handle.

That same letter further confirmed in Section 4 that there is no requirement that all types of CLEC requests be capable of electronic submission, thereby also confirming that total flow-through is not a requirement for CLEC requests.

Mr. Bradbury compares flow-through rates both with and without designed fall-out requests included, and states that flow-through rates which include designed fall-out requests are much lower. I certainly will not argue that one rate will be lower (or higher) than the other – that is obvious. The true issue is that BellSouth's performance should be evaluated based upon a flow-through calculation that excludes requests that are designed to fall out. This approach has most recently been confirmed by the Georgia Public Service Commission. Even though the Georgia Commission ordered an additional calculation to indicate that there is, in fact, a difference between the two results, the performance benchmarks only apply to the flow-through calculation excluding designed fall-out. It does not provide, as Mr. Bradbury purports on line 57, lines 10-11, any proof that "BellSouth's design decisions have a detrimental and discriminatory affect on CLEC flow-through." It simply supports the FCC-approved concept that all CLEC requests are not expected to flow through. Incidentally, LSRs that fall into the designed fall-out category number less than 10% of all electronic LSRs sent (8.2% for May 2001).

At page 62, Mr. Bradbury provides rates of designed fall-out of CLEC requests for various BellSouth interfaces, and makes the point that certain rates are higher than others. Mr. Bradbury's comparison merely substantiates a commonly known fact: the more complex the type of order, the more likely it is to be of a type that is designed to fall out. CLECs that use EDI, for example, generally send in more complex LSRs than do CLECs that use LENS. It also highlights the fact that BellSouth has taken the initiative to make electronic ordering of complex services available to CLECs as a convenience, even if they do not flow all of the way through the systems.

Mr. Bradbury states at page 62, lines 10-13 that “CLECs using TAG or EDI…and employing particular market entry strategies – UNEs, LNP, and business resale – will be significantly constrained by BellSouth’s imposition of manual processing.” Let me reiterate my earlier position that – for the same reasons CLECs want flow-through – so, too, does BellSouth. However, there is absolutely no substantiation to Mr. Bradbury's implication that BellSouth purposefully does not provide flow-through in an effort to impede CLEC market entry or growth. Once again, Mr. Bradbury uses examples that reflect the types of requests that are most likely to fall out for CLECs, and, where similar retail offerings exist, those same types of requests are also are handled manually for BellSouth retail.

BellSouth has the same desire to allow flow-through for as many request types as possible, and Mr. Bradbury's claims of drastic flow-through problems are exaggerated. To put this in perspective, designed manual fall-out affects only 8-9% of all electronic LSRs submitted, and any manual processing from BellSouth system errors affects only 11-13% of all electronic LSRs. BellSouth is also committed to processing these LSRs as quickly as possible. Measurements exist to readily track BellSouth's performance in this area.

On page 63, lines 1-2, Mr. Bradbury states that "manual processing simply cannot handle volumes or provide the responsiveness of electronic processing." The issue here, particularly for services highlighted by Mr. Bradbury such as the UNE-P, is whether AT&T has a meaningful opportunity to compete. Volumes of ordering and provisioning for the UNE-P in Kentucky and other states indicates that CLECs are able to efficiently order the UNE-P (as shown in my discussion of the Georgia 1000 Trial later in this testimony), as BellSouth is provisioning thousands of these services every month.

At page 63, line 6, and later at lines 19-20, Mr. Bradbury again refers to "BellSouth's retail LSRs", and heads off into another comparison with CLEC LSRs, suggesting that BellSouth can submit all orders electronically that flow through 100% of the time. Again, BellSouth does not issue LSRs. As I stated earlier, and will discuss in more detail here, a CLEC issuing a complex order via the industry-standard LSR format, is not

appropriate. The issue is one of translation of an LSR-formatted request to a format that can be accepted by BellSouth's Service Order Communication System ("SOCS") for provisioning by further downstream BellSouth's OSS legacy systems. The interfaces utilized by BellSouth's business retail units do not have to deal with this translation issue because the retail requests are built in a SOCS-compatible format.

Mr. Bradbury's testimony also suggests that it is a simple matter for BellSouth to electronically input any order for a BellSouth retail customer, implying that BellSouth does not offer nondiscriminatory access, and that is not the case. While true that BellSouth's retail requests can be electronically transmitted, it is hardly a simple matter for BellSouth's service representatives to input any order. The following will explain why.

For most simple business products and services, BellSouth's retail Regional Ordering System ("ROS") has process flows designed into the system which allow a BellSouth service representative to follow a logical step-by-step process using a point-and-click type of selection/entry methodology to build a service order in SOCS-readable format.

As illustration, Exhibit OSS-87 provides an example (via screen snapshots) of a simple change request for adding call waiting to an existing account. It is easy to see that for this request there are programmed selections available using drop-down boxes, labeled folders and point-and-click selection/entry inputs.

For complex services, BellSouth representatives must manually enter that request information into ROS in a “free-form” format, because there are no process flows programmed within the ROS application to handle all of the variables associated with the different types of complex services.

Exhibit OSS-88 provides an example (again, via screen snapshots) of one of BellSouth's complex requests – changing an account to ESSX service. From the illustration and accompanying text, it is apparent that BellSouth's service representatives must manually input each and every USOC, FID, etc. into the service and equipment sections in the SOCS-compatible format without benefit of any process flows which provide programmed selections. The final screen snapshot in this exhibit illustrates a portion of the final order, showing elements of the service order that had to be manually input.

While the ultimate electronic submission for a BellSouth retail complex service request may be the result of a single employee manually typing it, requests for complex services are actually the result of a team of employees working to develop the information necessary for that single employee to input the request. That team might include the account team, system designers, network specialists and other subject matter experts required for input of information to the request.

Once that team has done its collective work, and the BellSouth service representative has gathered and arranged all of the necessary information, it is then typically written on a paper service request form. It is from that form that the single employee inputs the request utilizing the Regional Ordering System ("ROS") interface, for example, for a business transaction. ROS then transmits the SOCS-compatible formatted order which can then be distributed to the downstream provisioning systems.

For CLECs placing a complex service request, the process is substantially similar. It is still a team effort, but involves CLEC personnel along with BellSouth account team representatives, system designers and other BellSouth subject matter experts. Once the order information has been gathered and arranged by the CLEC, it is then handed off via the LSR process to BellSouth's Local Carrier Service Center ("LCSC"). This process requires the CLEC to fill out an LSR for the requested service.

It is from this LSR that the BellSouth LCSC representative inputs the request to the Direct Order Entry ("DOE") system. In other words, at that point, a single employee types the order into DOE, which in turn puts the information into a SOCS-compatible format, and distributes the order to the same downstream service order and provisioning systems as does the BellSouth retail order process. I reiterate that this is the same "competitively neutral" situation as cited earlier from the Florida Commission ruling in Docket No. 000731-TP.

This process ensures that CLEC service requests are processed in substantially the same time and manner as are BellSouth's retail service requests. Thus, BellSouth's process falls within the nondiscriminatory access guidelines of the FCC.

Mr. Bradbury states, at page 64, lines 8-9, that “BellSouth’s flow-through performance is significantly below parity and the benchmarks established by the Georgia Public Service Commission.” Mr. Bradbury's statement is typical of his generalizations – broad, with exaggeration. BellSouth’s general performance, while still below benchmarks in some areas of flow-through, can hardly be described as “significantly below” the Georgia Public Service Commission benchmark as stated by Mr. Bradbury. Only business flow-through could be considered in this light, and as I stated in page 106 of my direct testimony, business LSRs are more difficult, and only amount to 4.9% of the total volume of electronically-submitted LSRs. In fact, BellSouth's residential flow-through performance was only 3% better than that of the CLECs for May 2001 (93% vs. 90%).

Beginning on page 64, Mr. Bradbury states that BellSouth is not committed to the success of the Flow-Through Improvement Task Force, as mandated by the Georgia Commission. Mr. Bradbury could not be more incorrect. BellSouth's Task Force has been working diligently within the Change Control Process (“CCP”) for several months to analyze flow-through, with the goal of improving it. He cites the fact that there have only been 3 meetings of the Task Force as an example of BellSouth’s lack

of dedication. Mr. Bradbury appears to be utilizing the same logic that he accuses BellSouth of using, which is the substitution of "quantity reporting for quality evaluation." (Bradbury testimony, page 88, line 5). He is correct that the Task Force has met 3 times, but he is incorrect to imply that the number of meetings is indicative of the progress of the group, or BellSouth's dedication to the improvement of flow-through.

At no time has BellSouth had more resources committed to the flow-through issue by identifying and bringing lists of flow-through improvements to the CCP. BellSouth will continue to do so, and has invited the CLECs to submit their suggestions as well in each of the meetings. At this point, the Task Force has received only three suggestions from the CLECs – one submitted through the Task Force, and two existing suggestions that the CLECs requested be moved to the Task Force from the CCP. Therefore, I do not understand Mr. Bradbury's allegation of a lack of dedication by BellSouth in this matter

BellSouth has been attempting to identify areas of flow-through improvement since well before the formation of the Task Force, and continues to work on those pre-Task Force issues in conjunction with those newly identified by the Task Force. Following is a representative list of key items installed or planned, along with release numbers and implementation dates:

- Do Not Tear Down ("DNTD") MemoryCall Mailbox (Release 9.2, April 7, 2001) (LSRs with non-resellable USOCs no longer require

manual handling because the DNTD FID (field identifier) for MemoryCall Service is populated.)

- CKL2 not populated when LOC provided on SL1/SL2 ReqType AB (Release 9.2, April 7, 2001) (This was identified as a defect. – The second circuit location ("CKL2") is now populated properly when the location ("LOC") information is provided for that second location, and these requests will not drop for manual handling any longer.)
- Allow the ability to submit LSR on non-affected PSO (Release 9.4, July 28, 2001) (On an account that has a pending service order, systems will allow submission of an LSR that does not affect the pending service order ("PSO"), BellSouth's systems will allow submission and flow-through of an LSR provided that the activity requested on that LSR does not affect the PSO. Currently, all LSRs issued on accounts w/PSOs require manual handling.)
- Develop process to handle ACT of T outside moves (Release 9.4, July 28, 2001) (This modification will allow flow-through of activity ("ACT") of T-type requests (outside moves), which is currently available for electronic ordering, but is on the designed manual fall-out list.)
- Enhancements to Fast Track (central office-based) Line Sharing (Release 9.4) (Among a host of enhancements to the Line-Sharing functionality, this modification will allow automatic validation of certain account and line activity types (ACT and "LNA") on initial Line Share orders that currently fall out for manual handling when submitted electronically. Also, the LSR that is

required to establish Line-Sharing on a line that currently has ADSL on it will flow-through without falling out for manual handling, and supplemental LSRs will flow-through without falling out for manual handling.)

- New install with no prior service at LOC, and service address is valid in RSAG (Release 9.4, July 28, 2001) (This enhancement for LEO/TAG/LENS will allow electronic ordering and flow-through of an LSR when service is being installed at a new address that has had no prior service – provided the address is valid in the Regional Street Address Guide ("RSAG"). Currently, all such requests fall out for manual handling.)
- Modify CHC and DFDT for designed loops (Release 9.4, July 28, 2001)

  (For LEO/TAG ,this modification to the entries in Coordinated Hot Cut ("CHC") and Desired Frame Due Time ("DFDT") fields will facilitate flow-through when populated correctly. However, requests will reject if certain conditions regarding those fields are not met .)
- Add NEWLOC to EDI (Release 9.4, July 28, 2001) (This EDI enhancement is similar to an improvement listed above for LEO/TAG/LENS to allow electronic ordering and flow-through when service is being installed at a new RSAG-valid address that has had no prior service.)
- Modify CHC and DFDT for designed loops (Release 9.4, July 28, 2001)

(This LENS modification to entries on CHC and DFDT fields is similar to a previously listed improvement for LEO/TAG.)

- Est. DD (at Inquiry Menu) will not calculate more than two business lines (Release 9.4, July 28, 2001) (This enhancement will provide correct due date calculation at the inquiry menu for more than two business lines, and allow LSRs to be sent and processed without falling out for manual handling.)
- LUD on migrations (Release 10.0, September 29, 2001) (This enhancement will allow the systems to recap and add the local usage detail ("LUD") option automatically when an LSR is issued to migrate an end user with LUD to a CLEC. Currently, such an LSR falls out for manual handling.)

On page 65, line 4, Mr. Bradbury alleges that there have been some inaccuracies in task force meeting minutes and an inability to contact BellSouth's task force project manager. To the extent that he is implying that inaccuracies were intentional, he is incorrect. Any Task Force meeting minutes that have been issued with errors of fact have been corrected when brought to the attention of the Task Force. Correction of errors in meeting minutes is standard procedure in any like situation. What is not standard procedure, and what BellSouth has done on a number of occasions, is agree to change the words because AT&T wanted to say the same thing in a different way. AT&T is the only participating CLEC that has had, and continues to have, a problem with

wording. That does not mean BellSouth's minutes have been "inaccurate."

Mr. Bradbury's remarks regarding the availability of BellSouth's Task Force project manager are unfounded, as well. The project manager has adhered – and will continue to adhere – to the request of the Task Force participants. At the formation of the Task Force, the participants – as a group – determined that all questions, concerns and responses would come through the CCP, and that the distribution of all such correspondence would be provided through CCP channels to all participants of the Task Force, as well as to the other CLEC members of the CCP. The purpose of this policy is to ensure that all issues are known, and that all decisions are made with full participation. BellSouth fully supports that concept. All CLECs do not have the same agenda, and the most important aspect of the Task Force – as it is for the CCP – is to ensure that the CLEC community as a whole is best served – not just the most vocal ones.

On page 65, line 12, Mr. Bradbury alleges that BellSouth lacks dedication to eliminating defective programming and designed manual fallout. He presents a series of AT&T complaints about Task Force activities that did not conform to AT&T's desires. AT&T is the only CLEC complaining, so Mr. Bradbury's assessment must be considered with that in mind. Non-constructive complaint letters from one CLEC is no substantiation of "lack of dedication" on BellSouth's part, and Mr. Bradbury's assessment is only

an opinion. I do not agree with it, and I direct attention to BellSouth's commitment to resources and analysis as confirmation of our dedication.

At page 68, lines 7-8,, Mr. Bradbury states as fact that because the LCSC representative does not add any information, [that] reveals that BellSouth has the technology to create SOCs readable LSRs for all products, services and transactions so that such LSRs can flow through. As is reported in the monthly flow-through reports, there is a category entitled ”BST Caused Fallout”. In a number of instances when LSRs fall out due to BellSouth errors (e.g., a USOC conflict when the CLEC has input the correct USOC), the LCSC representative can and will fix the error, and re-submit it to the electronic process. That correction would take place no other way except for the LCSC representative manually adding the correct information to the order. In some situations regarding LSRs designed for manual fall-out, LCSC representatives must make the value judgment or decision that is required to supplement the LSR information, and allow for subsequent generation of the BellSouth service orders. While I generally agree that manual intervention can introduce error, there are instances in which only a human can supply the inputs to offset the reason that certain types of orders could not be programmed for flow-through in the first place. Therefore, Mr. Bradbury's assertion is incorrect.

In his attack on BellSouth’s reasons for designed fall-out, at page 69, lines 5-6, Mr. Bradbury states that “BellSouth already has the technology to process so-called complex services without human intervention through its

retail front-end systems." This is the same issue I discussed previously in this part of my direct testimony, and I showed that BellSouth's retail complex orders have manual processes associated with them that are not part of the pre-order function.

At page 69, lines 9-11, Mr. Bradbury says that "most if not all of the 13 categories of CLEC LSRs that fall out to manual processing by design have retail analogs that flow through when submitted via BellSouth's font-end retail systems." Mr. Bradbury is incorrect. Again I refer back to my earlier testimony regarding the fact that BellSouth's complex services have non-pre-order manual processes associated with them that cannot be considered as orders that flow-through. Further, I can confirm that not all of the CLEC LSR categories that fall out have retail analogs, much less achieve flow-through.

Mr. Bradbury next states, on page 69, lines 17-18, that "there are sufficient volumes to justify more robust flow through capability." Mr. Bradbury's rationale for disclaiming the validity of BellSouth's 'low-volume' category of fall-out is misleading. He wants this Commission to accept that a particular number of designed fall-out service requests nullifies the credibility of BellSouth's low-volume category of designed fall-out.

To set the record straight, the low volume category is not a measurement or relative comparison of the total number of designed fall-out requests. Rather, it is a category for types of service requests that have not been

programmed to flow through, because the CLECs do not submit enough of those types of requests to justify any programming expense.

I also take exception to Mr. Bradbury's overstatement of the number of LSRs that fall out for manual processing each month because of BellSouth's system design. In his typical liberal use of unsupported numbers , he cites approximately "70,000" as the number of LSRs in that category but his number also includes LSRs that fell out due to CLEC errors. The correct number that he should have quoted for May 2001 is 29,195 – far fewer than the number he cited here and elsewhere in his testimony.

Second (and regardless of which number Mr. Bradbury uses), his implication that all of those LSRs fall under the low-volume category is absolutely incorrect. In fact, in May 2001, not a single CLEC LSR that fell out was for service requests in the low-volume category as these have not been programmed for electronic submission, so the number Mr. Bradbury cites (even if he were to use the correct number) was actually spread over the remaining 12 categories of designed fall-out. His contention that 70,000 LSRs constitutes sufficient volumes to require more flow-through is a complete misapplication of the low-volume justification.

Mr. Bradbury states in his question that I imply in my direct testimony that CLECs are responsible for designed manual fall-out if they do not upgrade their interfaces. Mr. Bradbury's statement is incorrect. Functionality

improvement is one of the reasons BellSouth enhances CLEC interfaces. One such improvement might provide CLECs opportunities to gain flow-through on types of service requests that previously did not flow through.

An example of that occurred when BellSouth made Telecommunications Industry Forum ("TCIF") Issue 9 available as an upgrade from Issue 7. Included in that upgrade was the ability of flow-through for requests with the hunting-series completion feature. CLECs with Issue 7, and a need to issue requests with that particular feature, would certainly be better served by upgrading to Issue 9, but that is not mandatory. It is the CLEC's decision, but it is clear that a decision to upgrade will improve designed fall-out performance.

At page 73, lines 8-9, Mr. Bradbury states that "BellSouth's retail operations have flow through capability that is far superior to that provided to CLECs." In the strictest sense, flow-through performance for BellSouth service requests is only a diagnostic benchmark relative to measurement of CLEC request performance. There is no true BellSouth retail analog because there truly is not an apples-to-apples comparison of processes. With that said, and by using benchmark comparisons, Mr. Bradbury's statement is a gross overstatement of purported fact. In May 2001, for example, CLEC residential resale requests had a flow-through rate of 90.16%, while BellSouth's retail residential figure was 93.20% – hardly an advantage that can be construed as "far superior." There is no BellSouth retail analog for unbundled network elements ("UNEs"), so Mr. Bradbury

can make no comparisons there. And, there is no BellSouth business retail flow-through measurement available, so, likewise, comparisons are not possible.

Third-Party Test Evaluation of Flow-Through

Q. ARE MR. BRADBURY'S CRITICISMS OF KPMG'S TESTING OF BELLSOUTH'S FLOW-THROUGH DISTORTED AND INCORRECT?

A. Yes. In this proceeding, beginning on page 58, Mr. Bradbury of AT&T makes a number of allegations concerning the results of KPMG's report on the third-party test in Georgia. I will address all of these allegations here.

Mr. Bradbury criticizes KPMG's analysis of BellSouth's flow-through data. AT&T has taken excerpts from the KPMG report and used these excerpts to distort the actual effort and outcome of the KPMG evaluation of the Percent Flow Through Service Requests report. KPMG's Flow-Through Evaluation Report is attached as Exhibit OSS-66 to my direct testimony of May 18, 2001. **THIS EXHIBIT WAS INTRODUCED EARLIER.** I have also attached KPMG's Motion for Leave to Articulate Basis for Statistical Analysis in the GA 271 Test Final Reports, filed 6/25/01 in the Louisiana Public Service Commission ("LPSC") 271 proceeding, Docket No. U-22252-E as Exhibit OSS-80, in which KPMG describes its use of statistical analysis during the third party test in Georgia. KPMG did indeed conduct a flow through evaluation that complied with the Georgia Commission's

Order of May 19, 1999. KPMG performed a thorough flow through analysis. Where KPMG's flow through replication did not accurately match the BellSouth results, KPMG issued an exception, which BellSouth corrected. KPMG was very much concerned with accuracy, which prompted the following changes to BellSouth's flow through reporting.

January 2000 - pending supplement LSRs - were counted as CLEC errors, moved to BST errors. Then, after further KPMG review, in September 2000, these pending supplements were more correctly categorized as neither a CLEC error nor a BST error; they are excluded from the flow through calculation.

February 2000 and April 2000 - the requirement that the LSR must also have received a FOC and CN was added to the flow through requirement.

October 2000 - the LSR count was corrected by using the correct company code table for the LSR count. The auto clarification count was corrected by a change in the code used to count auto clarification. BellSouth responded to KPMG that the October 2000 report had been corrected, and was available to the CLECs upon request.

KPMG started its audit in Georgia by using the September through November 1999 flow through reports because they were the most current

reports at the time the flow through audit began. As KPMG indicated, they also used the February 2000 and October 2000 reports that showed the further accuracy changes BellSouth made to the flow through report in response to KPMG's findings.

KPMG did not evaluate the accuracy of BellSouth's "retail" flow through rate because it was clearly not within the scope of the evaluation for the Percent Flow Through Service Requests which assessed the degree to which LSRs submitted by CLECs would flow through.

On page 58 of his testimony, Mr. Bradbury of AT&T further referenced KPMG's caveat that "[c]ertain information and assumptions (oral and written) have been provided to KPMG by the management of BellSouth and other third parties...." and that KPMG "has not independently verified to the accuracy or completeness of the information provided..." and alludes that KPMG did not conduct an audit to determine if the BellSouth Percent Flow Through Service Requests report are accurate. The key word in the caveat is "certain". AT&T fails to reference the Evaluation Methods, the Analysis Methods and the Evaluation Criteria used by KPMG to conduct the audit. It is obvious throughout the KPMG report, that although certain information may have been gathered without an independent verification, extreme efforts were used in ensuring the accuracy of the report and the data used to evaluate the report.

AT&T inaccurately states that KPMG did not independently verify the accuracy of BellSouth's raw data. In KPMG's statement that "certain" data had not been independently verified, AT&T interpreted "certain" data to mean BellSouth's raw data. AT&T has absolutely no evidence that KPMG did not verify the raw data used in the evaluation. To the contrary, KPMG has very explicitly stated what data it used and how it was used to perform the evaluation. Please see "Table 3: Data Sources for Flow-through Evaluation" in KPMG's Percent Flow Through Service Requests report, which was attached as Exhibit OSS-66 to my direct testimony of May 18, 2001.

In summary, KPMG complied with the Georgia Commission's Order when it conducted the evaluation of the Percent Flow Through Service Requests report. After BellSouth made KPMG's recommended changes to the Flow-Through Report, KPMG found that the report satisfied the evaluation criteria.

Rejected LSRs

Q. MCI/WORLDCOM COMPLAINS ABOUT LSRS REJECTED DUE TO INCORRECT ADDRESSES. PLEASE COMMENT.

A. During the pre-order process, MCI/WorldCom should review the BellSouth CSR for its customer to extract the customer's address for population to the LSR , and then validate that address to RSAG. MCI/WorldCom would

also be reviewing services that the customer had with BellSouth for sales opportunities.

Ms. Lichtenberg states on page 11, that MCI/WorldCom "has created an application-to-application interface with TAG that allows MCI to perform a service address validation and obtain the customer's CSR. These two transactions are necessary." MCI/WorldCom therefore acknowledges that this is a required function to prevent the issuance of a clarification resulting from an incorrect service address.

Currently, two change requests (CR0313 and CR0371 which was submitted by AT&T to validate on telephone number field versus the address field), have been combined since both requests are related to not requiring the end user address field for Resale and Migrations with activity types of V, P, and Q.

As of July 12, 2001, MCI/WorldCom informed the BellSouth account team that the manual handling reject number has decreased.

Access to Loop Facility Assignment Control System ("LFACS")

Q. SHOULD BELLSOUTH BE HELD ACCOUNTABLE FOR CHECKING A CLECS CFAS, AND FURTHER, BE REQUIRED TO PROVIDE DIRECT ACCESS TO ITS LFACS?

A. The answer is no in both cases. Ms. Berger of AT&T, on page 16 line 12, states, "…another source of unreasonable delay…occurs when BellSouth returns a FOC without first checking the availability of its connecting facility assignments ("CFAs"). BellSouth has agreed to submit a change request to the CCP to alter its processes for electronically available facility checks to address this issue through the addition of a post FOC unsolicited response sent from BellSouth to the CLEC when the order reaches PD status and after an electronic facility check has been completed. Additionally an optional field would be added to designate the "new" FOC response for only selected LSRs. .

Nevertheless, CLECs are responsible for submitting complete and accurate LSRs with accurate assignments to BellSouth for CFA cable and pair assignments, and for maintaining their own records so that they may perform accurate assignments of their cables. The CFA assignments that Ms. Berger's says BellSouth should check are the AT&T assignments, not the BellSouth assignments. This function is clearly AT&T's responsibility.

On page 19, lines 5-6, Ms. Berger says that BellSouth agreed to give AT&T access to LFACS, but that access has not yet been granted. As referenced in my direct testimony on page 87, line 21 through page 88, line 2, BellSouth already provides CLECs access to the LFACS database through the LMU process which provides CLECs with the loop makeup information needed to qualify loops for high speed services, including ADSL and HDSL

Although Ms. Berger seeks to confuse the issue, BellSouth is properly working through the CCP to address AT&T's request for access to the CFA cable and pair data that resides in BellSouth's LFACS database. AT&T submitted Change Request 0368, requesting that CLECs be provided new pre-ordering functionality so that they could validate the CFA cable ID and channel pair prior to submitting the LSR. They also requested that, if it is determined that the cable id and channel pair are working, the circuit identification would be provided.

During the April 25, 2001 CCP Monthly Status meeting, CLECs re-prioritized change requests, and CR0368 moved up in the ranking to number 9. BellSouth has completed User Requirements for this effort. The "draft" User Requirements are scheduled to be delivered to the CLECs on August 3, 2001 and the final User Requirements on August 9, 2001. The scope of releases for the remainder of 2001 have not yet been finalized, but BellSouth is targeting this request for CAVE on December 08, 2001 and full production on January 5, 2002. , Once the release scope is finalized, this information will be communicated to the CLECs through regularly scheduled CCP communication channels.

Other Ordering Issues

Q. SOME CLECS HAVE EXPRESSED CONCERNS THAT BELLSOUTH HAS A "SHORTCUT" ORDERING PROCESS FOR END USER

CUSTOMERS THAT DESIRE TO RETURN TO BELLSOUTH FROM A CLEC, IS THERE A BASIS FOR SUCH AN IMPLICATION?

A. Absolutely not. BellSouth does, in fact, provide end user customers ("end users") with ordering processes to make possible their return to BellSouth service, but they are neither "shortcuts", nor are they discriminatory. In the simplest terms, they are essentially processes that are the reverse of those used when an end user migrates from BellSouth to a CLEC in the first place, and are accomplished within substantially the same time and manner.

Q. PLEASE DESCRIBE THE PROCESSES.

A. There are two standard scenarios under which an end user might wish to return to BellSouth for its local service – from a resale status and from a facilities-based CLEC. I will describe both.

Generally, in a resale situation, an end user calls BellSouth's retail business office to express a desire to return to BellSouth, and it is the retail unit that negotiates the new order to return the end user to BellSouth. The ordering process is handled via the Regional Negotiation System ("RNS") or the Regional Ordering System ("ROS") depending upon whether the end user is a residential customer or business customer. A "new" order is issued re-establishing the account as

BellSouth's, and the appropriate interval is assigned based upon the products and services requested by the end user.

BellSouth also issues a “disconnect” order which discontinues the local exchange service account under the CLEC’s billing authority. The dates of both orders are coordinated to prevent an end user from losing dial tone at the time that the billing arrangement is transferred and actual service changes (if requested) occurs. Additionally, BellSouth validates the end user’s desire to return back to BellSouth by contacting a third-party vendor that might be representing an end user, or by obtaining a letter of agency directly from the end user authorizing the transfer of service back to BellSouth.

If an end user’s service is provided via a facility-based provider, BellSouth’s ordering process for returning that end user to BellSouth is more complex. That is because the ordering and provisioning components of porting, or transferring, the end user’s telephone numbers back to BellSouth include physical activities that must be coordinated with the CLEC. First, the BellSouth customer service representative must set up the request for service under a new BellSouth account. The “new” order is issued via RNS or ROS depending upon whether the end user is a residential or business customer.

Once the “new” order is processed via RNS or ROS, the BellSouth representative places the order on hold until the associated coordination

activities are completed. The coordination activities include identification of the circuit ID(s), issuing the local service request ("LSR") to the current CLEC provider, and coordinating the activities associated with the Number Portability Administration Center ("NPAC" - the industry organization that is responsible for handling all of the messaging between local exchange service providers that must occur when telephone number ownership is transferred.) To a degree, BellSouth is at the mercy of CLEC intervals, and it has been our experience that, depending upon the type of service(s) to which the end user subscribes, the port-back, or transfer, process could take as many as twelve business days.

As I stated above, these processes clearly mirror those through which an end user goes when migrating from BellSouth to a CLEC, and occur under substantially the same time and manner.

PROVISIONING

Completion Notifications ("CNs")

Q. ON PAGE 82, LINES 17-18, MR. BRADBURY STATES BELLSOUTH IS MISINFORMED AS TO WHEN COMPLETION NOTICES ARE DELIVERED TO CLECS. PLEASE COMMENT.

A. Mr. Bradbury's comments concerning BellSouth's delivery of Completion Notices ("CN") is partially correct. Contrary to Mr. Bradbury's suggestion,

for the majority of orders BellSouth returns the CN once BellSouth's systems determine that the service is completed, is error free, and is in Completed/Error Free ("CPX") or Posted Complete/Error Free ("PCX") status. On April 7, 2001, BellSouth began returning CNs for an additional status category entitled Completed Order ("CP") status. There is no PC status, as referred to in Mr. Bradbury's testimony. Prior to April 7, 2001, BellSouth did not send a CN based on the CP status to CLECs. This change was requested in November 2000, as a result of third-party testing, and the change resulted in a more timely CN delivery for those orders that are completed by BellSouth's provisioning units, but are not yet in CPX status.

Q. DOES AT&T QUESTION BELLSOUTH'S RETURN OF COMPLETION NOTIFICATIONS?

A. Yes. On page 81of his testimony, Mr. Bradbury claims that BellSouth routinely fails to return completion notifications to CLECs. Ms. Norris, on pages 43-44 of her testimony, makes similar remarks. AT&T apparently bases this assertion on KPMG's receipt of completion notifications during the Third Party Test in Georgia. Please refer to my testimony of May 18, 2001, beginning at page 159 for details regarding the not satisfied test criteria related to completion notifications.

During the Third-Party Test in Georgia, KPMG opened Georgia Exception 125 to address the issues of untimely or erroneous CNs. BellSouth

responded by opening defect 3078 to correct the problems related to CNs for LNP orders, and feature 11920 to address CNs for non-LNP orders. Feature 11920 was prioritized and implemented with Release 9.2 on April 6, 2001, in accordance with normal procedures defined by the CCP. Defect 3078 generated two change requests that have been prioritized by BellSouth's internal process. This did not allow for KPMG to re-test in these areas. However, BellSouth offers the CSOTS system as an alternative method by which CLECs can check the status of a service order, including completion date. As outlined in Georgia Exception 125, KPMG did perform a functional test to observe the accuracy of the CSOTS system. Based upon these test results, KPMG found that less than 3% of all transactions contained CN inconsistencies. KPMG concluded that these inconsistencies were "not significant enough to affect the overall evaluation of the test criterion." Thus, KPMG determined that the exception had been satisfied and closed the exception with the approval of the Georgia Public Service Commission.

Q. HAS BELLSOUTH RESPONDED TO MCI/WORLDCOM'S REQUEST FOR TRACKING DATA?

A. Yes. On page 9, Ms. Lichtenberg of MCI/WorldCom states that MCI had requested EDI tracking numbers (ISA/GA numbers) so that MCI may do internal research to resolve its problem with missing notifiers for firm order confirmations and completion notifications. Based upon that request, BellSouth provided MCI/WorldCom with the tracking number information.

MAINTENANCE AND REPAIR

Q. IS MR. BRADBURY OF AT&T REQUESTING THAT BELLSOUTH PROVIDE A MAINTENANCE AND REPAIR ARRANGEMENT FAR IN EXCESS OF WHAT THE FCC REQUIRES, AND IN EVEN IN EXCESS OF WHAT BELLSOUTH PROVIDES FOR ITSELF?

A. Yes. On pages 88-93 of his testimony, Mr. Bradbury questions the nondiscriminatory nature of BellSouth's electronic trouble reporting systems. As I have stated in my direct testimony of May 18, 2001, BellSouth provides nondiscriminatory access to its electronic trouble reporting systems – the same systems that BellSouth uses for itself. In fact, and as I have also previously testified, the version of the Trouble Analysis Facilitation Interface ("TAFI") for CLECs is actually superior in that it combines the complete functionality of the separate business and residence versions that BellSouth's repair attendants use.

What AT&T is requesting for itself is an arrangement that is not based upon any existing standards, and would combine the functionality of the non-integrateable human-to-machine TAFI interface with the integrateable machine-to-machine Electronic Communication Trouble Administration ("ECTA") gateway to give AT&T something that BellSouth itself does not have, and that no other CLEC has requested.

Mr. Bradbury, on page 94-95, outlines the chronology of AT&T's change request issued through the CCP specifically asking for TAFI functionality via the ECTA interface. Unfortunately, he omits the response that BellSouth provided to that change request. BellSouth informed AT&T that BellSouth could develop such a non-industry-standard integrateable interface, but it would require a Bona Fide Request from AT&T. Since AT&T would be the only CLEC using the interface, AT&T would also have to pay for this development in advance. Further, development of the interface would be outside of the scope of the CCP. To date, BellSouth has not received such a request.

Mr. Bradbury states, beginning at page 94, line 20, that BellSouth told the FCC staff in 1998 that "BellSouth could provide initial TAFI functionality via the ECTA interface in 13 months and complete functionality in 18 months." BellSouth absolutely never said that. BellSouth said then (as it said in the response to the change request) that it could develop a non-industry-standard arrangement to deliver TAFI-like functionality over a machine-to-machine interface – not that it would be provided over the existing ECTA interface, which is built to national standards.

Mr. Bradbury discusses the 1999 letter to BellSouth from the FCC Common Carrier Bureau staff, suggesting that it restates the FCC's findings regarding nondiscriminatory access to BellSouth's repair OSS. If anything, the letter actually clarifies the FCC's earlier findings on several points of the BellSouth Second Louisiana Order. I have provided a copy

of Bureau Chief Lawrence Strickling's letter as Exhibit OSS-86 and have referred to it in my discussion of flow-through elsewhere in this testimony.

Interestingly, the letter clearly shows that the FCC did not conclude that TAFI's lack of integration constitutes nondiscriminatory access. Moreover, although the letter does note opportunities for BellSouth to improve CLEC functionalities, it also confirms BellSouth's contention that its maintenance and repair access is within FCC requirements.

Further, in the first order granting 271 relief (Bell Atlantic, New York), the FCC stated in Paragraph 215 that it specifically disagreed with "AT&T's assertion that Bell Atlantic must demonstrate that it provides an integrateable, application-to-application interface for maintenance and repair." Finally, in a more recent order granting 271 relief (Southwestern Bell Telephone, Texas), the FCC reaffirmed that position, stating in Footnote 565 that it "determined that a BOC is not required, for the purpose of satisfying checklist item 2, to implement an application-to-application interface for maintenance and repair functions – provided it demonstrates that it provides equivalent access to its maintenance and repair functions in another manner." BellSouth has done that.

On April 20, 2001, the Georgia Commission issued its order in docket no. 11853-U regarding the interconnection agreement between AT&T and BellSouth. The Commission ordered that:

> BellSouth has provided AT&T with parity with respect to its maintenance and repair interface through its provision of complete access to TAFI." The Commission noted that its conclusion is consistent with the FCC's New York Order: "In that proceeding, the FCC found that Bell Atlantic was not obligated to demonstrate that it provided "an integrateable, application-to-application interface for maintenance and repair. ¶ 215. The evidence in this proceeding supports that BellSouth uses the same interface that it makes available to AT&T. (Tr. 1088).

Therefore, BellSouth has provided parity with regard to its maintenance and repair interface.

Furthermore, the Florida Public Service Commission in its Final Order (Docket No. 000731-TP) dated June 28, 2001, sent the clear message that "BellSouth provides AT&T access to its M&R [maintenance and repair] trouble reporting systems in a manner similar to that it provides retail customers. While BellSouth's repair interfaces may not integrate all functionalities AT&T desires, repair reporting access is similar to that of BellSouth retail maintenance and repair." Further, the Florida Commission found "that if AT&T desires to integrate full TAFI functionality into ECTA on a non-industry standard basis, AT&T shall present a formal BonaFide Request to BellSouth and pay for the added functionality desired."

GEORGIA 1000 TRIAL – A CARRIER-TO-CARRIER TEST BETWEEN BELLSOUTH AND AT&T

Q. PLEASE EXPLAIN BELLSOUTH'S GOOD FAITH PURPOSE AND RATIONALE FOR ENTERING THE GEORGIA 1000 TEST WITH AT&T.

A. Before discussing AT&T's allegations about the Georgia 1000 Trial, particularly those made in the testimony of Edward Gibbs attached to Mr. Bradbury's testimony as Exhibit JMB-3, I would like to make some general comments. The purpose of my general comments is to place the Georgia 1000 Trial in proper context. I believe that it will be easier for this Commission to understand BellSouth's rationale for agreeing to the terms and conditions of the Trial, and BellSouth's expected outcome. Before doing so, I would like to discuss the purpose and design of the Georgia 1000 Trial, particularly with regard to AT&T's reasons for requesting the Trial and BellSouth's reasons for agreeing to do so.

The purpose of the Trial was to validate both BellSouth's and AT&T's ordering, provisioning, billing requirements and procedures for port/loop combinations. It was designed to achieve the following goals regarding port/loop combinations services:

- Validate BellSouth's ability to electronically acknowledge, translate and process AT&T LSRs and Supplements (SUPPs), including cancellations;

- Validate BellSouth's ability to electronically send Acknowledgements, Firm Order Confirmations, Rejects/Clarifications/Jeopardies and Completion Notices;
- Validate AT&T's ability to properly order (via LSR) port/loop combination services;
- Validate AT&T's ability to respond electronically to BellSouth's Firm Order Confirmations, Rejects, Clarifications, Jeopardies and Completion Notices;
- Validate BellSouth's ability to provision and bill port/loop combination services (conversions, changes, suspensions, restorals, cancellations, and disconnections); and
- Validate BST's ability to deliver daily usage files and bill daily usage.

AT&T's stated reason for requesting the test was to ensure that both AT&T and BellSouth could effectively order, provision, deliver and receive usage records and bill UNE-P prior to its commercial deployment.

On October 11, 1999, BellSouth received a letter from Jill Williamson of AT&T requesting that BellSouth work cooperatively with AT&T in conducting a comprehensive test of the UNE-P in Georgia. AT&T requested that BellSouth participate in the Trial in an effort to test and operationalize AT&T's UNE-P efforts in Georgia.

To start the test, AT&T requested that BellSouth install 1000 residential test lines into one of AT&T's central offices. Initially 800 lines were connected as BellSouth retail lines, with provisions to install 200 new UNE-P lines at a later date. The installation process was completed in December 1999.

In another show of good faith, BellSouth began the installation process of the 800 BellSouth retail lines without a signed test agreement. BellSouth requested that AT&T provide a comprehensive test plan, but AT&T never did so. BellSouth believed that because the trial was a joint effort between BellSouth and AT&T, BellSouth should have had the opportunity to review AT&T's intended order scenarios and expected outcomes. Moreover, AT&T did not elect to follow the normal testing process by submitting pathfinder orders. The pathfinder order process is a step in the testing process that allows CLECs to confirm that transactions flow to the production environment without incident and that transactions can be properly translated. This is an important step in the testing process, particularly with new functionality. Once the pathfinder process has been thoroughly tested, normal testing would begin. Ordinarily, a joint Test/Trial is handled in this manner. However, AT&T elected not to provide BellSouth with the requested test scenarios or expected outcomes needed to test effectively. Because the trial was a joint effort between BellSouth and AT&T, BellSouth should have had the opportunity to review AT&T's intended order scenarios and expected outcomes prior to the beginning of the test.

Q. DOES MR. GIBBS MAKE NUMEROUS INCORRECT STATEMENTS REGARDING THE GEORGIA 1000 TEST?

A. Yes. Mr. Gibbs claims, in paragraph 11, that the Third-Party Test ordered by the Georgia Public Service Commission did not simulate real-world production. This is absolutely incorrect. In fact, the KPMG report and letter provided as Exhibits OSS-64-67 to my direct testimony of May 18, 2001 clearly disproves Mr. Gibbs' claims.

I do not agree with Mr. Gibbs' statements in paragraphs 16-17 that the multiple phases of the test were due to BellSouth's OSS problems. In Mr. Gibbs own testimony he states that AT&T started testing immediately following the Georgia Public Service Commission's Order that allowed CLECs to order the UNE-P. Mr. Gibbs' clearly states that AT&T initiated testing and not BellSouth. In reality, AT&T started sending orders without having a signed agreement and without even letting BellSouth know that the test was beginning. It is unclear why Mr. Gibbs makes such a claim. The multiple phases of the Georgia 1000 Trial were the direct result of AT&T's unilateral decisions to, among other things, proceed without first coming to an agreement as to the parameters of the testing.

In paragraph 19, Mr. Gibbs states, "Each phase of the Georgia 1000 test began with AT&T placing an order for BellSouth to provide local phone service to 800 of the 1000 lines." BellSouth does not agree. Mr. Gibbs

ignores that some of the difficulties were caused by the fact that AT&T converted some of the BellSouth retail test accounts to UNE-P during Phase I. Those accounts were not converted back to BellSouth at the beginning of Phase II. Since the accounts were not migrated to their original state, unnecessary complications resulted. For example, AT&T submitted duplicate local service requests for the same end-users in Phase I and Phase II. AT&T also issued LSRs to remove features that had been previously removed. These complications also skewed the test results. For this reason, BellSouth believes that the data collected by AT&T for the Georgia 1000 Trial is unreliable. Moreover, BellSouth believes that the Trial is theoretically flawed.

For a Trial to be both reliable and effective it has to be conducted in a controlled environment. The Georgia 1000 Trial was not a controlled test. BellSouth's intent was to work cooperatively with AT&T testing both BellSouth's and AT&T's UNE-P capabilities and to do so in a controlled environment. The purpose for conducting such a Trial is to determine if gaps exists and fix them in a timely manner. The Georgia 1000 Trial neither proves nor disproves BellSouth's current capabilities to provision the UNE-P. In fact, the most reliable indicator of BellSouth's ability to provide the UNE-P lies in commercial usage. In April, BellSouth processed 40,989 LSRs for the UNE-P region-wide.

In paragraph 30, Mr. Gibbs alleges that BellSouth had significant difficulty in handling AT&T orders during phase II. I do not agree. I would agree

that Phase II revealed gaps and that both companies worked aggressively to resolve those gaps. From BellSouth's perspective, this was the intended purpose of the Trial and BellSouth has made every effort to work with AT&T in resolving issues.

In paragraph 28, Mr. Gibbs states, "The metrics that measured BellSouth's performance in the Georgia 1000 test were agreed upon by BellSouth and AT&T in the phase II and III test agreements." BellSouth never agreed to AT&T's metrics. As a matter of fact, it would be impossible to do so. One reason why this is impossible is the fact that EDI timestamps were the primary instrument of communication between BellSouth and AT&T regarding the ordering and provisioning of service during the Georgia 1000 Trial. BellSouth cannot calculate measures based on AT&T's EDI time-stamp even if it were inclined to do so. Moreover, neither BellSouth or any other party can verify AT&T's results..

The Addendum to the Georgia 1000 Trial Agreement signed by BellSouth and AT&T outlines the metrics for which BellSouth would and would not report results for the Trial. BellSouth PMAP metrics represent standards approved by the Georgia Public Service Commission which were used as the basis for BellSouth results. BellSouth adhered to the requirements in the Addendum to the Georgia 1000 Trial Agreement and expected AT&T to do likewise. However, the only official Georgia metric standard utilized by AT&T in the test was the "Percent of Orders Acknowledged on Time" metric.

In paragraph 35, Mr. Gibbs states, “BellSouth has no CLEC testing environment in which BellSouth and CLECs can test revisions to BellSouth’s OSS code to identify and solve problems before they affect real customers.” As previously discussed herein, BellSouth’s CLEC Application Verification Environment (“CAVE”) test environment was implemented on April 7, 2001. CAVE allows a CLEC to perform functional testing for pre-production and post-production releases. BellSouth and interested CLECs will use the CAVE to test some minor releases.

In paragraph 36, Mr. Gibbs states, “Phase II revealed that a customer could lose dial tone if she got cold feet about signing up for AT&T local service and changed her mind.” The scenario described in Mr. Gibbs’ testimony did occur approximately thirteen months ago and has since been corrected. As a result of the testing with AT&T, BellSouth corrected the potential service problem in June 2000. BellSouth implemented a feature, which relates both orders, and requires both dates to change if one date changes.

In paragraph 39, Mr. Gibbs states, “BellSouth’s business rules did not permit AT&T to offer customer services relating to multi-line accounts on parity with BellSouth.” This is simply incorrect. As described on pages 96-97 of my direct testimony of May 18, 2001, BellSouth’s systems allow CLECs to electronically order both initial and subsequent partial migrations. BellSouth's systems, however, do not allow CLECs or itself to

provide certain features, such as multi-line hunting, across different local service providers, which is what AT&T was attempting to test. Mr. Gibbs contends that BellSouth could provide multi-line hunting service to its end-user when AT&T could not. Mr. Gibbs specifically sites the example of a multi-line hunt end user who migrates part of his service to AT&T while maintaining service with BellSouth. In this instance, a multi-line hunt end user would no longer remain the customer of one telephone provider. BellSouth restricts hunting arrangements when the billing names are different. This restriction occurs even when the hunting arrangement is at the same premise. This restriction applies to BellSouth for its retail accounts, as well as to CLEC accounts. Based on the equal treatment in this scenario, BellSouth provides parity.

Mr. Gibbs states in paragraph 41, "The Georgia 1000 test revealed that BellSouth has significant flow-through problems." I do not agree. The test results revealed that both BellSouth and AT&T contributed to the 78.13% flow-through results AT&T achieved in Phase II. For example, AT&T contributed to the fall-out percentage rate when AT&T submitted multiple subsequent orders without verifying the CSR. AT&T issued order upon order for the same end-user without confirming that the CSR information had changed. This flaw in AT&T's methodology caused unnecessary manual fall-out, thereby, resulting in a lower flow-through percentage rate. Of course, that this may not have been AT&T's expected outcome is unclear, since as I stated earlier, BellSouth never received the test scenarios or the expected outcomes. However, in any event, AT&T

achieved a flow-through rate of nearly 90% in phase III, which exceeds the Georgia Commission's benchmarks for UNE flow-through.

In paragraph 43, Mr. Gibbs states, "Yet 14.2% of the improper LSR rejections received by AT&T were a result of mistakes by BellSouth's service representatives." Because Mr. Gibbs does not provide data to support his claim; therefore, I am unable to specifically respond to his allegation. However, BellSouth concedes that human error may occur occasionally; nevertheless BellSouth is committed to doing its part to reduce these errors.

In paragraph 44, Mr. Gibbs states, "BellSouth was consistently unable to send timestamps to AT&T on a timely basis as a result of various system problems." BellSouth addressed this issue by installing the new Mercator EDI platform in November 2000. The Mercator EDI platform has resolved these problems and is providing CLECs with improved performance and reliability.

In paragraphs 46-48, Mr. Gibbs claims that BellSouth maintains an "inadequate telephone number reservation system." Mr. Gibbs is incorrect when he says that if a CLEC wants to install new service, "step one is go to the database and reserve a phone number. " It is not necessary to reserve a telephone number prior to placing an order for new service. Generally, a telephone number request is made at the time an end-user places a firm order for new service. However, if a CLEC wants to reserve

telephone numbers in advance of placing a firm order for service, a reservation can be made. As described in my direct testimony of May 18, 2001, on page 78, lines 4-6, CLECs may reserve telephone numbers using the TAG or LENS interfaces. Just as for BellSouth retail, the telephone number is not guaranteed.

In paragraphs 49-54, Mr. Gibbs summarizes Phase III of the trial. Phase III of the Trial began on October 25, 2000 and ended February 21, 2001. During this phase, AT&T and BellSouth processed transactions resulting in 6,318 service orders. While Phase III of the Georgia Trial was in progress, BellSouth was also in the process of migrating CLECs to a new EDI platform, Mercator. BellSouth and AT&T realized that this could impact the results of the Trial; however, both companies agreed to continue the testing process. AT&T acknowledged that by ending Phase III of the Trial after November 30, 2000, test results could be impacted, as noted in the Georgia UNE Trial Agreement. AT&T also acknowledged that the risk associated with running the Trial during this time period could result in a negative impact on metrics measurements.

In paragraph 55 of his testimony, Mr. Gibbs stated “A frequent occurrence during Phase III was the receipt of a Completion Notice for work that BellSouth had not yet provisioned to AT&T’s customer.” Mr. Gibbs is not correct. BellSouth did experience a problem during the month of November 2000, which caused a delay in CLEC’s receiving Completion Notices. The problem not only impacted AT&T, but also affected all

CLECS as well as BellSouth's retail operation. The problem resulted from a defect in BellSouth's CRIS Billing System, which caused completed service orders not to post to the telephone account. The result was that CLECs did not immediately receive completion notices and CSRs were not immediately updated. The problem was identified and corrected quickly.

Once the problem was identified, BellSouth advised AT&T that they should verify the CSR before billing their end user customer. The CSR validation process is a critical step in the validation process that CLECs should perform before billing their end users.

In paragraph 56, Mr. Gibbs states "Another Completion Notice problem experienced by AT&T was the receipt of Completion Notices for work that had not been performed." Mr. Gibbs' allegations are simply incorrect. The problem occurred when AT&T issued an LSR to migrate an end user, and then issued a Supplemental LSR to modify the request. In the interim, the service order had been generated and the work completed. As a result, AT&T received a rejection on the subsequent request. Once an order is issued and the work completed a Supplemental LSR cannot be processed, but rather a new LSR must be submitted.

In paragraph 57 of his testimony, Mr. Gibbs states "AT&T ran "cold feet" scenarios where a customer decides that he or she wanted AT&T service and then decides to remain with BellSouth service." AT&T intentionally

created this problem by submitting migration orders, then issuing Supplemental LSRs to cancel the request without checking the status of the original order. AT&T made accusations in Phase II of the Trial that BellSouth did not relate the orders that resulted in lost dial tone. BellSouth corrected the problem by relating the orders to prevent a possible conflict in the dates assigned to these orders. Now that BellSouth has corrected the problem by relating the orders, AT&T continues to complain.

Mr. Gibbs states, at paragraph 60, "BellSouth admitted in the Phase III Exception Report that at least one of its mistakes (the inadvertent switching problem) was caused by a backlog in the service center." In January 2001, BellSouth opened the new Fleming Island Wholesale Operations Center. The Fleming Island Center operates solely as a call center, thus allowing the other centers to concentrate on order processing.

In paragraph 61, Mr. Gibbs states, "system problems were a consistent source of problems during phase III", as demonstrated in entries in the Phase III Exceptions Report." Mr. Gibbs is not correct. The data Mr. Gibbs provides seems to indicate that BellSouth and AT&T were equally responsibility for the problems AT&T experienced. Mr. Gibbs contends that BellSouth systems caused the problems – this simply is not true. AT&T constantly submitted subsequent LSRs before validating a previous order had been completed and records changed. BellSouth believes that AT&T's order methodology created unnecessary manual intervention and unnecessary delays.

Q. DID THE GEORGIA 1000 TRIAL PRODUCE PROCESS IMPROVEMENT?

A. Yes. The Georgia 1000 Trial has produced significant process improvements. The Trial has not only benefited AT&T, as its test partner, but every other CLEC submitting UNE-P orders.

- BellSouth isolated CLEC transactions from those of other trading partners on the old EDI platform. The implementation initially caused some delays as CLECs were migrated to a separate processing site and adjustments were made. This action prevented activity from other trading partners from interfering with CLEC activity.
- BellSouth, with cooperation from AT&T, detected a problem with telephone number reservation requests processed via the LENS pre-order process. The problem was identified and corrected.
- AT&T and BellSouth jointly discovered a problem with UNE-P migration activity when a supplemental request was made to cancel the original order. The problem was identified and corrected.
- AT&T made BellSouth aware of a problem with the use of the CREX USOC. CREX is a code which places calling restrictions on the line. BellSouth Business Rules were unclear. As a result, BellSouth published the CREX USOC Job Aid that defined and explained appropriate use of the code.

- AT&T and BellSouth determined that the use of all upper case letters in the directory listings section did not obtain the desired directory listing.
- AT&T and BellSouth used the analysis provided in the Trial to train their respective service representatives on observations made during the Trial.

The levels of current commercial usage reflect these improvements and clearly demonstrate that BellSouth is fully capable of fulfilling UNE-P orders. In Kentucky and Georgia in May 2001,CLECs electronically transmitted 19, 886 LSRs for UNE-P.

STABILITY, CAPACITY, AND AVAILABILITY OF BELLSOUTH'S INTERFACES FOR CLECS

Use of RSIMMS during the Georgia Third Party Test

Q. DOES BELLSOUTH PROVIDE CLECS WITH SUFFICIENT CAPACITY TO PROCESS CURRENT AND PROJECTED VOLUMES?

A. Beginning on page 85 of his testimony, Mr. Bradbury of AT&T criticizes BellSouth's production capacity for CLECs' electronic interfaces. He quotes a representative of KPMG concerning BellSouth's production capacity. Ms. Norris of AT&T makes similar comments, beginning at page 26 of her testimony. BellSouth's comment to KPMG must be put into

context. In mid-1999, when the MTP for the Third-Party Test in Georgia was developed, it was decided that the volume tests would be performed in the Reengineered Services, Installation and Maintenance Management System ("RSIMMS"). RSIMMS emulates the production environment in interoperability and end-to-end (flow-through) testing in support of the functionality that facilitates a CLEC's ability to process the following transaction types on BellSouth's OSS: submit LSRs, receive Functional Acknowledgments, receive FOCs, receive CNs, and receive Rejects, Clarifications, and Service Jeopardies. (BellSouth's production environment is called "ENCORE.") The MTP directed KPMG to perform four volume tests in RSIMMS: two normal volume tests and two peak volume tests.

The volumes for these tests were determined by forecasting the expected order volume for year-end 2001. KPMG obtained the transaction growth rates from CLECs and BellSouth. The peak volumes were defined as 150% of transaction volume levels during the busiest consecutive 8 hours of the normal volume test.

RSIMMS was an existing testing facility used by BellSouth that could readily be used to execute the normal and peak volume tests. Moreover, BellSouth, as well as KPMG, was confident that the production systems could be effectively enhanced to match the RSIMMS capacity, and that is precisely the conclusion KPMG reached:

"…except for specific, preauthorized changes that were made in RSIMMS to support the requirements of the volume test, the applications implemented in the RSIMMS environment mirrored those of BellSouth's ENCORE production system."

"Specific changes were made to the RSIMMS environment to support the business volumes required to accomplish KPMG's volume test. KPMG is not aware of any reasons, and is satisfied, that these same changes could be made to the production environment such that it could support the same volumes as were tested in KPMG's volume evaluation." Appendix to the MTP Final Report, on page 5, attached as Exhibit OSS-64 to my direct testimony filed on May 18, 2001.

During the Georgia Third-Party Test, KPMG conducted five volume tests, the purpose of which was to evaluate BellSouth's OSS associated with specified volumes of pre-ordering and ordering activities, and to determine if BellSouth could demonstrate the development of computing capacity for a future workload level. The TAG/EDI "normal" volume test evaluated BellSouth's performance by sending approximately 35,000 orders with 118,000 associated pre-orders on two occasions over a ten-hour period. See Version 1.0 Master Test Plan Final Report at V-C-6 (describing pre-ordering volume test (PRE-4) and ordering volume test (O&P-3) being executed concurrently). The TAG/EDI "peak" volume test evaluated BellSouth's performance by sending approximately 43,000 orders with 118,000 associated pre-orders on two occasions over an eight-hour

period. See Version 1.0 Master Test Plan Final Report at V-C-6 (describing pre-ordering volume test (PRE-5) and ordering volume test (O&P-4) being executed concurrently). The fifth volume test occurred in BellSouth's production environment and was conducted at the production environment's stated capacity level, the results of which confirm the capabilities of BellSouth's OSS. Specifically, KPMG tested BellSouth's ability to accurately and quickly process orders and their associated pre-orders using EDI and TAG using the projected year-end 2001 transaction mix in the production environment at then current system capacity. See Version 1.0 Master Test Plan Final Report at V-J-1 (describing ordering volume test (O&P-10)). The Master Test Plan Final report was filed with the Georgia Commission in Docket No. 8354-U on March 20, 2001 and attached to my direct testimony filed on May 18, 2001, as Exhibit OSS-64.

As part of this test, KPMG sent approximately 7,400 orders with 24,600 associated pre-orders over an eight-hour period. These KPMG transaction submissions augmented the volume of transactions sent by live production CLECs so the total transactions that were sent during the production volume test were 21,600 total orders and 73,400 total pre-orders. After completing the test, KPMG found that BellSouth had satisfied each of the 21 evaluation criteria associated with this EDI and TAG production performance test. KPMG's production testing confirmed that BellSouth's EDI and TAG interfaces provide timely Functional Acknowledgements, timely and accurate FOCs, timely and accurate pre-order responses, and accurate order errors and clarifications. (MTP Final

Report, V-J-12). This extensive volume testing effort validates that BellSouth can and has developed the computing capacity to meet future CLEC transaction workloads. Indeed, current production volumes in ENCORE demonstrate that the systems are handling and are capable of handling the necessary load. The current production volumes in ENCORE are actually lower than what was tested in the third party volume tests. BellSouth typically sees 15,000-20,000 LSRs per day in production. The third party test tested normal and peak volumes of 35,000-45,000 LSRs per day in RSIMMS. The third party test tested production volumes of 16,000 LSRs per day, which is closer to current volumes in production.

Since the third-party test in Georgia concluded, BellSouth has increased the capacity of its production environment. Because of current projections, BellSouth recently has increased the capacity of its production environment. BellSouth has performed routine, ongoing, internal normal, peak, and stress volume tests that have shown that BellSouth's production environment has sufficient capacity. Therefore, contrary to Mr. Bradbury's statements on pages 85-86 of his testimony, BellSouth's production environment provides CLECs with sufficient capacity to process current and projected volumes. The table below shows RSIMMS at the time of the third party test, the production environment (ENCORE) at the end of 2000, and the production environment on June 30, 2001.

Type System	Application	RSIMMS2 Georgia 3PT	Production on 12/31/2000	Production on 06/30/2001
Midrange	TAG	1-HP K570 2-HP K580	2-HP K570	3-HP K570 1-HP K580 4-HP N4000
	LESOG	1-HP T520 4-HP K580	2-HP K370 2-HP N4000	2-HP K370 2-HP N4000 1-HP K580
	LEO/UNIX	1-HP T520	Retired. Functionality moved to Leo/Mainframe	N/A
	LNP	1-HP K360 2-HP K580	3-HP K460	3-HP K460
Mainframe	LEO/Mainframe	(U4SY-Test) Hitachi Skyline – 625 620 Mips - 24% Share	(B2SY) Hitachi CMOS P9-89S 1078 Mips – 35% Share	(B2SY) IBM Freeway 2064-109 1552 Mips – 33% Share
	SOCS, ATLAS, DSAP, RSAG	(U4SY-Test) Hitachi Skyline – 625 620 Mips - 24% Share	(O1SY) Hitachi Skyline – 727 878 Mips – 100% Share	(O1SY) IBM Freeway – 2064-1C8 1615 Mips - 83% Share
	BOCRIS, COFFI	(O1SY-Production) Hitachi Skyline – 727 878 Mips – 100% Share	(O1SY) Hitachi Skyline – 727 878 Mips – 100% Share	(O1SY) IBM Freeway – 2064-1C8 1615 Mips - 83% Share
	P/SIMS	(D2SY-Production) Hitachi CMOS P8-98S 846 Mips – 60% Share	(D2SY) Hitachi CMOS P8-98S 846 Mips – 60% Share	(D2SY) IBM Freeway – 2064-108 1443 Mips - 35% Share

Q. ON PAGE 86 MR. BRADBURY STATES, "BELLSOUTH'S LACK OF SUFFICIENT CAPACITY IS FURTHER DEMONSTRATED BY MODIFICATIONS TO BELLSOUTH'S ENCORE PRODUCTION ENVIRONMENT SINCE THE CONCLUSION OF THE GEORGIA VOLUME TESTS. IN DECEMBER 2000, BELLSOUTH UPGRADED A SERVER ASSOCIATED WITH LENS AND TAG AFTER THOSE INTERFACES SUFFERED NUMEROUS OUTAGES AND CLECS ENDURED DEGRADED PERFORMANCE FOR A NUMBER OF MONTHS." CAN YOU COMMENT?

A. Yes. BellSouth added a new TAG Security Server on December 11, 2000 as a result of the first outage that was reported by a CLEC on December 3, 2000. BellSouth attributed the capacity problem during the first week in December 2000 to the sunset of the LENS Version 5.x Platform that occurred on December 1, 2000. On December 1, 2000, the remaining CLECs that were still using the 5.x Platform were migrated to the current LENS platform, thereby increasing the traffic to the current LENS Platform. This created the server capacity issue for TAG. As I discussed on pages 21-22 of my direct testimony filed on May 18, 2001, the current version of LENS interfaces with the TAG gateway. BellSouth immediately added a new TAG Security Server to handle the additional capacity needs. This situation that occurred in December 2000 and BellSouth's solution are described in the Carrier Notification Letter SN91082158 dated January 11, 2001 (Exhibit OSS-89)

On page 31 of her testimony, Ms. Norris of AT&T complains that KPMG did not perform any stress volume testing in Georgia. The simple fact is that the Georgia Commission did not deem stress testing as necessary in Georgia when it issued its order for a third party test. In its ordering the Georgia Commission states, “The systems will be tested at both normal and peak volumes to evaluate BellSouth’s ability to process representative future wholesale transaction volumes to support CLEC’s entry into the market.” (GA PSC. Docket No. 8354-U. Order on Petition for Third Party Testing. Pg 4)

EDI Capacity

Q. DOES MR. BRADBURY INCORRECTLY INTERPRET RECENT INTERRUPTIONS IN EDI SERVICE AS PROBLEMS WITH CAPACITY?

A. Yes. Beginning on page 85 of his testimony, Mr. Bradbury of AT&T criticizes production capacity for EDI. The recent interruptions of service on EDI to which Mr. Bradbury refers are in no way related to capacity issues. Because BellSouth's former vendor who provided the translator for EDI notified BellSouth that it would no longer continue to support the former translator, BellSouth has been migrating CLECs to a new EDI translator. All CLECs, except one, were transitioned to the new translator by the end of June 2001.

The new translator provides CLECs with new capabilities. EDI is able to process multiple jobs simultaneously and at a faster rate. In addition, EDI is event-driven and is able to react as soon as a file is presented, as opposed to being batch-driven for overnight processing as in the past.

During this transition to Mercator, some outages of the EDI system have occurred. A record of those outages can be viewed on the Interconnection web site as noted by Mr. Bradbury. However, I would like to reiterate that these outages are not related to capacity issues or "increasing demand" in any way.

Exhibit OSS-90 (provides a graphical summary of the EDI outages from January through June 2001. In addition, there is a graphical presentation of the outages for the months of April and June 2001. The graph entitled "EDI Outages 2001" shows that there were no outages recorded on the website in January 2001, In February there three (3) outages, five (5) outages in March, five (5) outages in April, sixteen (16) in May and three (3) in June.

In April, the resolution for one (1) of outages was recorded as a Loss of Functionality (LOF) and was recorded as 17.4 hours. When compared to the posted EDI system availability time, a conservative system availability time of 644 hours per month was used. This was based on a 7-day 4-week month as opposed to the actual hours available for a full calendar month using 24 hours for Tuesday – Saturday, 18 hours on Sunday and 23 hours on Monday. The Loss of Functionality outage would have totaled 2.70% of the total posted EDI system availability time. The four (4) Full (F) outages lasted a combined total of 14.5 hours and would have been 2.25 % of the total EDI posted availability time.

In May, three (3) of the sixteen posted outages were for No Outage (N) situations. Four (4) were for Degraded (D) or slow service and lasted 2.25 hours or 0.35% of the posted EDI system availability time. Five (5) of the May outages were recorded as a Loss of Functionality (LOF) and lasted a combined total of 6.9 hours or 1.07% of the total EDI system

availability time. There were four (4) Full (F) outages which lasted a total of 10 hours or 1.55% of the total posted EDI system availability time.

In June, there were three (3) outages posted. Two (2) were determined to be No (0) Outages. One (1) was determined to have been for a Loss Of Functionality which lasted 3.76 or 0.58% if the total EDI posted system availability.

As reflected in matrix, the EDI system was available as follows for the months of April, May and June as follows:

- April 95.05%
- May 97.03%
- June 99.42%

Nevertheless, BellSouth takes all outages very seriously, and in an effort to minimize ongoing problems related to this transition, a 24/7, on-site monitoring team has been put into place. This team is constantly monitoring the process through the end of the Mercator transition in an effort to minimize any on-going impact to our customers. Additionally, the team is working with a continuous improvement team, and they have already implemented several process improvements.

Q. DOES MR. BRADBURY MAKE AN INCORRECT CLAIM THAT BELLSOUTH'S STEPS IN THE TRANSITION OVER TO THE NEW EDI

TRANSLATOR ARE “HIGHLY UNUSUAL, BUT AS YET UNSUCCESSFUL STEPS” TO RESOLVE EDI OUTAGES?

A. Yes. On page 85-86, Mr. Bradbury makes this claim. As I have previously discussed in my direct testimony, BellSouth acknowledges that we have experienced problems while working with our customers to transition them over to a new EDI translator. However, I’d like to clarify that the events that took place on May 2, 2001 did not impact AT&T. At the end of April, BellSouth discovered that there was a technical problem with the software used for Connect Direct for UNIX. As a result, BellSouth notified our customers that we were suspending the conversion of any additional customers to Connect Direct UNIX. There was no impact to customers, including AT&T, who were not using Connect Direct for mainframe to UNIX. For those customers who were impacted, we moved them back to the previous method used for Connect Direct. BellSouth continues to work with our vendors to resolve this issue. Until we are confident that there will be no further impact to our customers, we will leave them as is.

Additionally, BellSouth notified our customers that on May 19th we would have to perform an Emergency Maintenance Release and that EDI would not be available for LSR processing from 12:01 AM to 6:00 AM EDT. This action was taken simply to address some BellSouth internal programming issues, and was not related to reduction of outages.

LENS Outages

Q. DOES BELLSOUTH AGREE WITH AT&T'S INTERPRETATION OF THE LENS OUTAGES REPORT?

A. No. In paragraph 44 of her affidavit, Ms. Seigler of AT&T discusses the adverse impact on AT&T's ability to serve its UNE-P customers due to LENS outages. That should not be a problem for them in Kentucky, since AT&T has no UNE-P customers. Nevertheless, we will gladly address this assertion in anticipation of their entry into the market. AT&T's interpretation of the LENS outage report is incorrect.

BellSouth acknowledges that there have been LENS outages . This information is tracked at the BellSouth Interconnection Website under Change Control Process, Type 1 System Outages.[5] If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within 15 minutes of the outage verification. Either BellSouth or a CLEC may initiate a change request to address the problem. Type 1 System Outages will be processed on an expedited basis. Attached is a chart (Exhibit OSS-91) that summarizes the outages for the months of March through June 2001.

Exhibit OSS-91details the results of BellSouth's review of Type 1 outages posted the Change Control Process (CCP) website for determine based

[5] http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_so.html

on the final resolution on for each of the outages and compares it to the total time of the LENS posted system availability time. Upon resolution, each outage is classified into one of four (4) categories. The first is a No Outage condition that may occur for several reasons. First, the investigation finds that no problem actually existed. Second, the problem may be determined to have occurred on the customer side. Third, the investigation was unable to confirm that an outage actually occurred. And finally, the reported outage actually occurred during a previously announced scheduled downtime. Next, there is a Degraded (D) Outage. A Degraded Outage means that an application is processing less than normal capacity or is providing slow responses. This degraded condition may also impact one or more customers. Then, there is Loss of Functionality (LOF). Loss of Functionality is incurred when a function normally provided by an application is unavailable to any customer. This may also impact one or more customers. And, finally, there is a Full (F) Outage. A Full Outage occurs when an application is down or is totally inoperative to one or more CLECs.

In the month of March 2001, there were a total of fifteen (15) outages. Four (4) were determined to have been No Outage (N) and thus had no time associated with them. Four (4) were Degraded (D) or slow outages which lasted a total of 4.85 hours. Three outages (3) fell into the Loss of Functionality (LOF) category for a total of 6.6.83 hours. And, four (4) of those were determined to have fallen into the Full (F) category and lasted a total of 3.28 hours.

In the Month of April 2001, there were a total of ten (10) outages posted on the website. Four (4) were found to be No Outage situations, two (2) for Loss of Functionality lasting a total of 2.01 hours and four (4) were for Full Outages which lasted a total of 7.86 hours.

In May 2001, there were a total twelve (12) outages posted. Four (4) were for No Outages, three (3) for Degraded Outages lasting a total of 3.33 hours, three (3) Loss of Functionality which lasted 33.51 hours, and three (3) were Full (F) outages which lasted a total of 2.76 hours. You will note that there are a total of 13 outage types recorded in May but with a total of 12 outages reported. This is because (O) one outage was recorded as for both a Degraded (D) and a Full (F) outage.

In June 2001, there were a total of sixteen (15) outages posted. Three (3) were for No Outage (N). Five (5) were for Degraded (D) or slow outages which lasted a total of 5.53 hours. Four (4) were for Loss of Functionality (LOF) and lasted a total of 10.08 hours. Finally, there were 4 Full (F) outages which lasted 3.86 hours. You will again note that there were a total of 16 outage types recorded for the 15 outages in June. Again, one outage was recorded as both a Degraded (D) and a Full (F) outage.

A further comparison assessment was made which compared the total number of actual outage hours for each type of outage and the posted system availability hours. The supporting details of the assessment are

noted in the matrix in Exhibit OSS-91. .A conservative time of system availability of 548 hours per month was used. This was based on a 7- day 4- week month as opposed to the actual hours available for a full calendar month using 21 hours of system availability for Monday - Friday, 18 hours for Saturday and 14 hours for Sunday.

In March four (4) of the total number of fifteen (15) outages were for No Outage (N). The four (4) Degraded (D) or slow outages totaling 4.85 hours would have equated to 0.89% of the total LENS posted system availability time. The time for the three (3) Loss of Functionality (LOF) outages of 6.83 hours equated to 1.25% of the total of the posted LENS system availability time. And finally, the time associated with the four (4) Full outages (F) of 3.28 hours would have been a total of 0.60% of the LENS system posted availability time.

In April, four (4) of the total of 10 outages were determined to have been for No Outages (N). There were 2.01 hours posted for two (2) Loss for Functionality (LOF) outages that totaled 0.37% of the total posted LENS system availability time. Four (4) Full (F) Outages were determined to have lasted a total of 7.86 hours that equated to 1.43% of the total time posted as LENS system total availability time.

For May there were four (4) No Outages (N) reported. The three (3) Degraded (D) or slow service outages that lasted 3.33 hours totaled 0.61% of the posted LENS system total availability time. The three (3)

Loss of Functionality outages that totaled 33.51 hours or 6.11% of the total availability time were due mainly to one order type. LENS was having a problem returning notifications on xDSL orders. The investigation revealed that the problem was caused by a configuration problem. Measures were immediately put into place for a temporary fix and a team was formed to determine a long-term fix. The long-term fix was determined and was implemented on June 2, 2001. Finally, there were three (3) Full (F) outages which totaled 2.76 hours or 0.50% of the total availability time.

In June, there were three (3) No Outages (N) reported. Five (5) Degraded (D) or slow outages lasted a total of 5.53 hours or a total of 1.10% of the total posted system availability time. Four (4) Loss of Functionality (LOF) outages totaled 10.08 hours or 1.84% of the total posted system availability time. There were four (4) Full (F) outages that lasted 3.86 hours or 0.70% of the total posted system availability time.

As the matrix reflects from the Full Outage data, the LENS system has been available as follows for the months from March through June:

- March 97.27%
- April 98.2%
- May 92.77%
- June 96.45%

It is important to note that even though an outage is posted to the website that in many cases it may only not impact some of our all CLECs. As outlined in the Glossary that has been provided as a part of Exhibit OSS-91 that all type of outages, even a Full Outage, may impact only one customer. However, the posting of the outages to the web serves as a useful tool. It allows us to alert all of our customers that a problem has been reported and that each of those problems are actively being investigated by BellSouth.

TAG Response Time

Q. DOES BELLSOUTH AGREE WITH MS. LICHTENBERG'S ASSESSMENT OF THE TAG RESPONSE TIME ISSUE?

A. No. On page 11, Ms. Lichtenberg describes what she believes to be a TAG response time issue. BellSouth does not agree with her interpretation of the issue. Our investigation revealed that this problem is being caused by the way MCI/WorldCom is using the TAG security server. Currently, MCI/WorldCom is making a separate request through the TAG security server with each transaction it submits. The TAG security server is not designed to handle requests in this manner. Instead, MCI/WorldCom should acquire credentials once during the day and reuse them on all subsequent transactions. This will require a re-coding effort on MCI/WorldCom's part of their front-end interface to TAG. The design of the TAG security server and the way to use it properly was discussed with MCI/WorldCom. Detailed information for the proper coding of their system

can be found in the TAG API Documentation which is located at the BellSouth Interconnection website.[6]

This discussion may possibly have been the source that caused the misunderstanding Ms. Lichtenberg had when she stated, "the system was not built for the stress our commercial entry is placing on it." While the security server is not designed to handle transactions in the manner MCI/WorldCom is using it, the TAG environment is designed to handle the volume of business our customers are doing with BellSouth.

BellSouth feels confident that all of our OSS are fully capable of handling the orders submitted to us electronically. However, if MCI/WorldCom continues to have concerns surrounding this issue, the BellSouth MCI/WorldCom Account Team stands by its previous offer to work with MCI/WorldCom by using MCI/WorldCom forecasted data to ensure that our capacity estimates do in fact meet MCI/WorldCom's. Thus far, MCI/WorldCom has refused to provide that data.

Third-Party Test of System Availability

Q. MS. NORRIS QUESTIONS KPMG'S TESTING OF BELLSOUTH'S SYSTEM AVAILABILITY PLEASE COMMENT

[6] http://www.interconnection.bellsouth.com/oss/tag/tag_info.html

A. On page 42, Ms. Norris questions KPMG's method of testing BellSouth's system availability. Contrary to Ms. Norris's statements, KPMG did evaluate BellSouth's system availability properly, as reflected in Georgia Exception 133. Georgia Exception 133 describes KPMG's concerns regarding BellSouth's system availability and measurement of system availability. As a result, BellSouth modified the associated SQM measurement, and both KPMG and the Georgia Commission closed the exception as satisfied.

CONCLUSION

Q. PLEASE CONCLUDE YOUR TESTIMONY.

A. BellSouth's interfaces, processes, and procedures provide CLECs with access to the required OSS information and functions in substantially the same time and manner as BellSouth's access for its retail customers, and therefore conform to the FCC's definition of non-discriminatory access. BellSouth's OSS is designed, developed, modified, and measured for performance on a region-wide basis to operate in an undistinguishable manner whether a CLEC is in Kentucky, Georgia or any of the other seven states in BellSouth's region. PWC evaluated and confirmed BellSouth's assertion that its OSS is regional in nature. BellSouth respectfully submits that the Commission can rely on the results of the independent third-party test performed in Georgia, in addition to the evidence of actual commercial

usage, to determine that BellSouth provides nondiscriminatory access on a region wide basis to its OSS in Kentucky.