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 30 pages and 2 exhibit(s).

Ronald M. Pate

SWORN TO AND SUBSCRIBED BEFORE ME this 7th day of September, 2001.

NOTARY PUBLIC

Notary Public, Cobb County, Georgia
My Commission Expires June 19, 2005

BELLSOUTH TELECOMMUNICATIONS, INC.

SURREBUTTAL TESTIMONY OF RONALD M. PATE

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

CASE NO. 2001-105

SEPTEMBER 10, 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 surrebut the testimony filed by Mark G. Felton of Sprint and Sherry Lichtenberg of MCI/WorldCom filed on August

20, 2001, and Denise Berger and Sharon Norris of AT&T, filed on August 27, 2001.

Loop Makeup

Q. IS BELLSOUTH'S OSS REGIONAL IN NATURE?

A. Yes. On page 2 of his testimony, Mr. Felton implies that because the Corporate Facilities Database ("CFD") does not exist in Kentucky, BellSouth's OSS are not regional in nature. He further states that the Kentucky Commission should be cautious in relying on the Georgia Third-Party OSS Testing because of this difference. This inference is unfounded.

The source data for all loop makeup information is contained in the Loop Facilities Assignment Control System ("LFACS"). LFACS is available region-wide. When loop makeup is not built in LFACS, BellSouth personnel use a combination of Engineering Work Orders, field visits, and the plats that contain records of BellSouth's Outside Plant Facilities to develop the loop makeup data that is stored in LFACS. Therefore, the data is the same region-wide with the method of storage of the plats within BellSouth as the only difference. In some states, like Kentucky, the Outside Plant Facility data is recorded on manual or paper plats, whereas in other states, this data resides in the CFD, on a digitized version of the plats. Regardless of how the plat is maintained, when insufficient data

resides in LFACS for a CLEC to qualify a loop, and thus BellSouth obtains data from the plats, the loop makeup information that has been generated is populated in LFACS. For BellSouth to serve its own customers, BellSouth must perform manual service inquiries for information when there is no electronic access for the requested information. Therefore, the service inquiry process for loop makeup information for CLECs is accomplished (whether manually or electronically) in substantially the same time and interval as for services offered to BellSouth's retail customers on a regional basis.

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

A. Yes. The FCC's Interconnection Rules (at 51.319(g)) state that "[a]n incumbent LEC, as part of its duty to provide access to the pre-ordering function, must provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent LEC."

Further, in its UNE Remand Order, ¶427, the FCC required that an incumbent LEC provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent. BellSouth is compliant with both of these requirements. The FCC does not require all access to such information to be provided electronically, therefore, these processes are nondiscriminatory and in

compliance with FCC requirements. (See Pate Direct Testimony filed May 18, 2001, pp 89 forward, for a complete description of the loop makeup information provided by BellSouth.)

BellSouth's timely provision of nondiscriminatory access to loop makeup information is well supported by the commercial usage throughout the region and in Kentucky. The numbers of loop makeup inquiries for April 2001 through July 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%
July 2001	5287	100%	98.7%	238	100%

From January 2001 through July 2001, CLECs in Kentucky have sent 167 fully mechanized local service requests ("LSRs") for xDSL loops.

Loop Facilities Assignment Control System ("LFACS")

Q. SPRINT CLAIMS THAT THE LFACS DATABASE IS CURRENTLY INADEQUATE BECAUSE ALL BELLSOUTH LOCATIONS ARE NOT COMPLETELY LOADED INTO THE DATABASE. PLEASE COMMENT.

A. While 100% of BellSouth's loops are populated in LFACS with certain basic information, it is true that not all will have the detailed loop makeup information necessary to qualify a loop. However, and more importantly,

the loop makeup information available to CLECs in LFACS is the same loop makeup information available to BellSouth.

Historically, BellSouth populated detailed loop makeup in LFACS based upon anticipated requests for its designed services that require special engineering and provisioning, and that are often served by more than one central office or wire center. As a general rule, this was predominantly in business areas rather than residential areas. On the other hand, because there was previously no need for detailed loop makeup information on non-designed services that required no special provisioning and that were served by one central office, BellSouth had not populated LFACS with detailed loop makeup information for those loops. Accordingly, with the recent advent of xDSL services, these needs have changed, resulting in a large imbedded base (including residential areas) that may not yet contain this information.

It is estimated that as much as 85% of loops with detailed loop makeup information are populated in LFACS in some major metropolitan areas, where the marketing efforts of CLECs are most concentrated. As of July 2001, loop makeup data is populated in LFACS on approximately 46% of the total network feeder or distribution cable pairs region-wide, and on 50% of the total network feeder or distribution pairs in all wire centers in Kentucky. An example of the impact of the CLECs' marketing efforts and

BellSouth's response to such efforts, is the Armory Place wire center in Louisville, Kentucky which has over 83% of the total loops populated with detailed loop makeup information. To put this into perspective, in Kentucky there is loop makeup information for over 7.5 million database entries for loops in the LFACS database. In order to increase the loop makeup data in LFACS by *one percent,* loop makeup data must be generated and populated on over 75,000 facilities in Kentucky .

BellSouth is continuously updating and/or populating loop makeup data in LFACS. Each time a CLEC uses the manual service inquiry process, BellSouth loads the resulting loop makeup information into LFACS for future queries. Thus, the LFACS database improves on a daily basis, and will continue to do so.

Q. DOES BELLSOUTH'S MANUAL PROCESS MEET THE REQUIREMENTS OF THE FCC?

A. Yes. Nondiscriminatory access does not require that detailed information about loops be available electronically and involve no manual processes. For BellSouth to serve its own customers, BellSouth must perform manual service inquiries for information when there is no electronic access for the requested retail service/product. If a CLEC determines that it needs additional information that is not available electronically, the CLEC can

submit a manual loop makeup request. Therefore, Mr. Felton's complaints on page 3 of his testimony about the manual process for obtaining loop makeup information are unsupported by the requirements of the FCC. BellSouth is presently providing CLECs nondiscriminatory access to the same detailed information that it provides itself through both electronic and manual means. Thus, these processes are in compliance with FCC requirements.

Q. AT&T ASSERTS THAT BELLSOUTH HAS AGREED TO PROVIDE DIRECT ACCESS TO ITS LFACS TO ALLOW AT&T TO CHECK ITS OWN CONNECTING FACILITY ASSIGNMENTS ("CFA"). PLEASE COMMENT.

A. Paragraph 1.1.2.2.8 in the Memorandum of Understanding ("MOU") to which Ms. Berger refers on page 3 of her surrebuttal, clearly states that the Change Control Process will determine the implementation of this functionality. 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. Change Request 0368 is tracking the progress of this request.

The User Requirements have been internally baselined since March 30, 2001, and BellSouth is working through its Change Management group to prioritize and schedule implementation of this request, along with other functionality. Although I previously testified that BellSouth was targeting

this functionality for production in January 2002, regulatory mandates such as Line Splitting, along with high-prioritized CLEC changes such as CSR parsing, has impacted when BellSouth will be able to implement this request. The release implementation information will be conveyed to the CLECs through regularly scheduled CCP communication channels.

In the interim, BellSouth provides AT&T another tool with which to verify CFAs. BellSouth produces a report with daily updates that is posted to the web that shows the status of each CFA between BellSouth's network and AT&T's collocation arrangements. Please see the testimony of Mr. Keith Milner for further discussion of that process. If AT&T were to use this tool, BellSouth believes that AT&T's problems with erroneous CFA assignments on AT&T's LSRs would be reduced significantly, if not eliminated completely.

Additionally, paragraph 1.1.2.2.9 of the MOU stipulates that BellSouth will waive Order Coordination Time Specific ("OCTS") charges for any specific conversions where a post FOC CFA conflict occurs until such time as BellSouth provides CFA LFACS access as outlined in the MOU. BellSouth is prepared to do this for AT&T, and anticipates that this will be a rare occurrence if AT&T will utilize the CFA report mentioned above.

Q. ON PAGE 3 OF HIS TESTIMONY MR. FELTON QUESTIONS THE INTERVAL FOR COMPLETING THE MANUAL LOOP MAKEUP REQUEST. PLEASE COMMENT.

A. Mr. Felton offers no supporting information to substantiate his claim that manual loop makeup requests could be provided consistently in less than BellSouth's standard interval, or that this interval is excessive. BellSouth's interval is calculated based upon the "Receive Date" to "Loop Makeup Return Date" and includes the time to render the Firm Order Confirmation ("FOC"). The standard interval is three days, which is a target interval. In other words, manual loop makeup service inquiries are returned as soon as they are completed, and that may be earlier than the three day standard.

Contrary to Mr. Felton's assertion on page 3 of his testimony, it is not true that BellSouth's retail personnel can obtain loop makeup information in a few hours, or "contact incumbent back office personnel" to get loop makeup information. BellSouth must perform manual service inquiries when the information is not available electronically, just as the CLEC does. The service inquiry is accomplished in substantially the same and time and manner for the CLECs as it is for services offered to BellSouth's retail customers.

To date, only two manual loop makeup inquiries have been submitted by CLECs in Kentucky, and those were submitted in July 2001 by a CLEC other than Sprint. These inquiries were returned, on the average, in 1

day. Conversely, 647 mechanized loop makeup queries have been made since January 2001, in Kentucky. On a region-wide basis, 24,675 mechanized loop makeup queries have been made by CLECs and 867 manual loop makeup queries were made during the same time frame.

Mr. Felton is not correct that BellSouth's process does not comport with the FCC's UNE Remand Order. Per the FCC, a manual process is acceptable. When the required information is not available electronically, BellSouth provides the information with a manual process that is substantially the same as it provides such information to itself when required, in compliance with its obligations..

Q. ON PAGE 4 OF HIS TESTIMONY, MR. FELTON OF SPRINT IMPLIES THAT THERE IS SOME "MYSTERY" INFORMATION AVAILABLE TO BELLSOUTH PERSONNEL THAT IS NOT SHARED WITH THE CLECS. PLEASE COMMENT.

A. BellSouth has no relevant information for loop makeup that is not provided to the CLECs. BellSouth fully complies with the FCC's requirements, and provides CLECs with the same detailed information about the loop that is available to BellSouth. The additional customer-specific information in the paper plats or redacted CD-ROMs to which Mr. Felton is referring, is not required for loop qualification. Additionally, the paper plats that must be

accessed when the loop makeup information does not reside within LFACS is certainly not mysterious.

The assignment information that is required for loop qualification is located in LFACS, and is not located in the plats. Simply put, a loop cannot be qualified through the plats, therefore direct access to the plats is unnecessary for provision of nondiscriminatory access to loop makeup information. Further, the information that would be available through the plats is available through the manual service inquiry in Kentucky. Therefore, all information that is available to BellSouth for a similar service inquiry, is available to the CLECs in substantially the same time and manner.

Further, the plats contain BellSouth's proprietary network information as well as certain information regarding BellSouth's end user customers. For example, the plats provide detailed information on the exact location of cables serving military installations and financial institutions as well as police, fire, disaster recovery, and FAA locations, among others. Thus, the release of this information raises concerns not only about customer proprietary data, but also sensitive state and national security information. So, as explained herein, the information required for loop qualification is currently provided to the CLECs, as it is to BellSouth for its use, on a non-discriminatory basis without jeopardizing the integrity of BellSouth's

proprietary data. Therefore, direct access to the plats is unnecessary to accomplish such nondiscriminatory access.

In summary, BellSouth is providing the CLECs with the same detailed information about the loop that is available to BellSouth, as required by the FCC's Interconnection Rules (at 51.319(g)), and the continuous updating that occurs to LFACS as Engineering Work Orders are issued and as manual loop makeup inquiries are requested, emphasize BellSouth's commitment to continue to improve the processes by which that information is provided.

Finally, Mr. Felton relies on the North Carolina Utilities Commission Recommended Order Concerning All Phase I and Phase II Issues Excluding Geographic Deaveraging Issued June 7, 2001, at page 10 ("NCUC UNE Order"), to assert that BellSouth does not provide nondiscriminatory access to loop qualification information. BellSouth disagrees with the NCUC UNE Order that directed BellSouth to permit [CLECs] to access directly BellSouth's Corporate Facilities Database ("CFD"), and has submitted Exceptions to the NCUC, requesting this conclusion be modified. Based upon the explanation provided herein, BellSouth is hopeful that the NCUC will agree with its reasonable modification to the NCUC UNE Order to allow BellSouth to make "LFACS and LQS – or a functionally equivalent electronic system – available to

CLECs on a permanent basis." (BellSouth's Exceptions to Recommended Order filed July 6, 2001, Docket No. P-100, Sub 133d, at p. 7). This modification will allow BellSouth the flexibility to upgrade, update or even replace, its electronic systems and platforms as it recognizes changes in requirements or technology.

Competition and Capacity

Q. MS. LICHTENBERG QUESTIONS THE LEVEL OF COMPETITION IN BELLSOUTH'S REGION ON PAGE 2 OF HER TESTIMONY. PLEASE COMMENT

A. Based upon the June 2001 local service request ("LSR") volume as cited by Ms. Lichtenberg, CLECs issued 340,758 mechanized LSRs and 40,499 manual LSRs, for a combined total of 381,257 LSRs of *all* request types. Of that total, 18,939 LSRs (primarily UNE), or only 4%, were submitted by MCI/WorldCom. Accordingly, this Commission can rely on BellSouth's assertions that competition is thriving in its region. As of July 1, 2001, over 1700 CLECs in the BellSouth region have been approved by the public service commissions in the respective states to do business. There are 303 CLECs that are operational on a region-wide basis, with 77 of those doing business in Kentucky. Therefore, Ms. Lichtenberg's comment is without merit.

Q. ON PAGE 3, MS. LICHTENBERG QUESTIONS BELLSOUTH'S ABILITY TO HANDLE MCI/WORLDCOM'S COMMERCIAL VOLUME. PLEASE RESPOND.

A. Ms. Lichtenberg's statements are unsubstantiated and untrue. Notably, Ms. Lichtenberg provides no information as what constitutes "commercial volumes." Absent that evidence, BellSouth cannot respond except to point to the high levels of commercial usage of its OSS in Kentucky and throughout its region, and to say that KPMG's Third Party Test in Georgia fully tested the abilities of BellSouth's OSS to handle commercial volumes at various levels, and BellSouth's OSS met all criteria.

Further, there is nothing to support MCI/WorldCom's claim that BellSouth's OSS performance is somehow linked to MCI/WorldCom's inability to ramp up to what it considers "full commercial volumes." BellSouth stands ready to accept whatever order volume MCI/WorldCom chooses to submit

Line Loss Notification

Q. MS. LICHTENBERG SAYS ON PAGE 6 OF HER TESTIMONY THAT MCI/WORLDCOM *MAY* NOT HAVE RECEIVED LINE LOSS NOTIFICATIONS FROM BELLSOUTH. PLEASE COMMENT.

A. Ms. Lichtenberg's assertion is incorrect. MCI/WorldCom did, in fact, question its BellSouth account team via e-mail on August 14, 2001 about

its concern that line loss notifications were not being sent by BellSouth, and provided examples of telephone numbers for which BellSouth allegedly did not provide line loss notifications. On August 23, 2001, the account team informed MCI /WorldCom that line loss data for all of the MCI/WorldCom examples had been posted correctly and on time to the BellSouth Web-based Line Loss Notification Report and the PON Report – the usual locations for this data.

Upon BellSouth's explanation, MCI/WorldCom then complained that the loss notification information did not come via the Network Data Mover (NDM) – a data file transfer system that BellSouth and MCI/WorldCom utilize for a number of purposes, and yet a third method by which BellSouth provides line loss notifications to MCI/WorldCom. BellSouth researched the NDM transmission history, and found that, indeed, those line loss notifications had been sent on time. MCI/WorldCom was informed of that fact on August 30, 2001. On September 5, 2001, BellSouth's account team sent MCI/WorldCom an email providing a summary of Web-posted and NDM information, and emphasizing that the line loss notification for a given telephone number remains only seven days after its original posting. (See Exhibit RMP-1) Thus, it appears that even with 3 sources of information available to it, MCI/WorldCom apparently does not utilize the information in a timely manner.

Flow-Through

Q. MS. NORRIS QUESTIONS BELLSOUTH'S FLOW-THROUGH PERFORMANCE. PLEASE COMMENT.

A. Only the Business flow-through rate is well below the standard objective, while the Residence, UNE, and LNP measures are near or above their associated benchmarks. Although BellSouth continues its efforts to improve performance on all four metrics as described in Mr. Varner's testimony filed August 10 (Varner Supp. Dir., AJV-6 at 17), I respond here to the Business metric.

Ms. Norris misses the broader point, which can be drawn from a comparison to the FCC's comments on Verizon's flow-through performance. Even with average total flow-through rates of 46 to 49 percent for Residence and Business combined, the FCC concluded that Verizon's OSS is capable of flowing through competing carriers' orders in substantially the same time and manner as Verizon's own orders (Memorandum Opinion and Order, FCC 01-9 at 77). Calculating the comparable metric for BellSouth using the May data results in a total flow-through of 71% for Resale (Business and Residence) and 68% for June. This indicates that BellSouth's CLEC Resale order flow-through performance is significantly better than that achieved by Verizon in their Massachusetts filing approved by the FCC.

.Q. MS. NORRIS ALSO MENTIONS BELLSOUTH'S FLOW-THROUGH REPORTING. PLEASE COMMENT

A. On page 6 of her testimony, Ms. Norris brings up an issue regarding BellSouth's flow-through reporting. While I confirmed in a recent proceeding in South Carolina that BellSouth has discovered some inaccuracies in the Flow-Through Report regarding the designation of LSRs that fall out by design (Total Manual Fallout), I never stated or implied that these LSRs were BellSouth systems errors as Ms. Norris asserts. Further, Ms. Norris is misrepresenting the facts by implying such here. Rather, the issue relates to the Flow-Through Report process. As discussed below, BellSouth's initial assessment of MCI/WorldCom specific data has found that these improperly classified LSRs are predominantly CLEC caused errors which will have minimum impact on the CLEC Error Excluded Calculation for Flow-Through, but will result in significant improvement in Achieved Flow-Through Calculation. BellSouth has not completed its final assessment as to the overall impact on the Flow-Through Report as of this filing. Upon completion, the results for the Flow-Through Report will be revised for the months of June and July.

Q. ON PAGE 3 OF MS. LICHTENBERG'S TESTIMONY AND ON PAGE 6 OF MS. NORRIS' TESTIMONY THEY DISCUSS THE LEVEL OF LSRS THAT HAVE FALLEN OUT FOR MANUAL HANDLING. PLEASE COMMENT.

A. The Telecommunications Act does not require that every process be automated in order to achieve nondiscriminatory access. As I explained in

my previous testimony in this docket, and in Exhibit OSS-82 (Letter to BellSouth from FCC Carrier Bureau Chief Strickling), all CLEC service request types do not have to flow-through without manual handling, and, further, all CLEC service request types do not have to be able to be submitted electronically. Therefore, BellSouth is in compliance with FCC requirements in this regard. I further explained that BellSouth has the same interests in LSRs flowing through its OSS as do the CLECs. However, total mechanization of all types of requests is not possible due to either technical or practical reasons. Those categories of non-flow-through requests are published in BellSouth's proposed Service Quality Measurements ("SQM") for all states.

As I stated in a recent hearing in another state and referenced above in my response to Ms. Norris, BellSouth has uncovered an issue related to how planned manual fallout requests are categorized. Some requests are being designated as planned manual fallout that should be treated otherwise. As to Ms. Lichtenberg's concerns on page 4 of her testimony, for the large number of LSRs that fell out for manual handling, BellSouth found that when adjusted for MCI/WorldCom's LSR errors, 88.00% of MCI/WorldCom's requests flowed through in June. For the MCI/WorldCom LSRs that fell out by design, MCI/WorldCom had the opportunity to submit them electronically, instead of by facsimile. Specifically, of the 3,331 orders cited by Ms. Lichtenberg, 2,745 should have been reflected on the Flow-Through Report as CLEC-Caused Errors, as reflected in item number 130 on the Flow-Through Report that is

attached as Exhibit RMP-2. This Exhibit reflects BellSouth's correction for MCI/WorldCom's flow-through.

The 2,745 LSRs referenced above were inappropriately categorized as manual fallout by design due to an error in the Flow-Through Report designation. The error occurred when an enhancement to the due date calculator was implemented in Release 9.2.1 on June 2, 2001. When the due date could not be calculated due to incomplete information from the LSR, the LSR was being counted in the Planned Manual Fallout category of the Flow-Through Report. The most common cause of the due date calculation not working was a result of invalid service addresse. As a part of a due date calculation the service address on the LSR is validated via a query to the Regional Street Address Guide (RSAG) as required by the BellSouth Business Rules for Pre-Ordering, Section 31. If the address is invalid, the due date calculator returns a failure to calculate. These errors should have been returned to the CLEC for clarification. Based on BellSouth's assessment specific to MCI/WorldCom's June data, 2,738 of the 2,745 LSRs were the result of this error. Of these, 2,200 LSRs with address errors were corrected by the Local Carrier Service Centers ("LCSC"). The remaining LSRs were clarified back to the CLEC.

BellSouth's assessment of MCI/WorldCom's June data determined that the LSRs for the total manual fallout should be:

Category	Revised Quantity
• Complex	0
• Expedite	0
• Special Pricing Plans	1
• Denial/Restoral Conversion/Disconnect	59
• Some Partial Migration	0
• Class of Service Invalid	0
• New Telephone Number	0
• Low Activity Volume	0
• Pending Order	521
• LSR with > 25 lines	0
• Transfer of Calls Option	0
• Inaccurate CSR	2
• Directory Listing	3
TOTAL FALLOUT BY DESIGN	586

To summarize BellSouth's investigation of the circumstances surrounding MCI/WorldCom's report of 3,331 LSRs that fell out for manual handling, that number should be broken down as follows:

- 2,745 CLEC Caused Errors (including 2, 738 address errors)
- 586 LSRs Total Manual Fallout

Although MCI/WorldCom has addressed the issue of planned manual fallout (specifically special pricing plans) with CCP through the Flow-

Through Improvement Task Force, there are reasons why certain types of requests cannot be programmed for flow-through. Special pricing plans just happens to be one of them, because, by their very nature, such plans are unique and do not lend themselves to flow-through. For clarification, Ms. Lichtenberg's assertion that MCI/WorldCom's LSRs fell out due to special pricing is incorrect, because as I have explained in hearings before, special pricing plans typically do not apply when ordering UNEs. MCI/WorldCom's fall out for manual handling by design in June was primarily a result of a large number of Pending Service Orders. Due to the individual attention that must be given to these unique types of requests, it would be impractical and impossible to program the necessary coding to allow the systems to make whatever judgments and decisions are required when service requests are issued on accounts with pending service orders. This type of request – like those with special pricing plans – are appropriately and correctly handled manually, because that process requires human intervention.

Q. HOW DO YOU RESPOND TO MS. LICHTENBERG'S CLAIMS ON PAGES 4-5 THAT MANUAL PROCESSES HAVE NEGATIVE EFFECTS ON CONSUMERS?

A. For reasons that have already been discussed, flow-through for certain types of requests is not always possible. However, there are situations when consumers were harmed by processes that did not work as designed, but the source of such harm is not confined exclusively to

BellSouth's processes. Using figures supplied by MCI/WorldCom in Georgia, MCI/WorldCom-caused errors during a week in July accounted for approximately 95% of all errors on MCI/WorldCom's LSRs. Such errors delay provisioning of requests, and harm the consumer. The few LSRs that were clarified in error by BellSouth's Local Carrier Service Center ("LCSC") were worked promptly when the errors were brought to the LCSC's attention.

As BellSouth has demonstrated throughout this proceeding, and as Mr. Ainsworth reiterates in his surrebuttal testimony, BellSouth's manual processes work, and provide CLECs with nondiscriminatory access to BellSouth's OSS.

Q ON PAGES 6-8, MS. LICHTENBERG DESCRIBES FIVE SITUATIONS THAT BELLSOUTH SHOULD BE REQUIRED TO FIX REGARDING ITS OSS. PLEASE RESPOND.

A. The issues that Ms. Lichtenberg describes are neither "major flaws" nor do they need to be rectified. There are, however, some changes planned that will address some aspects of some of these issues. I will address each as follows:

1) *BellSouth must revamp its two-order process for UNE-P*: As described by BellSouth's witness Ken Ainsworth, BellSouth's current 'N' & 'D' service order process for UNE-P has an extremely high (>99%) rate of

success. That being said, in an effort to determine if BellSouth can provide an even better-than-99% success rate, BellSouth is currently developing requirements for the so-called 'single C' order process, and the feature is targeted for implementation in April 2002.

2) *BellSouth must change its ordering process to allow ordering based on the customer's name and telephone number:* This change has been accepted as a candidate for implementation. Due to technical issues, BellSouth had to remove the feature that would have allowed this capability from a June 2001 release. That feature will be implemented in a future release as expeditiously as possible.

3) *BellSouth must provide a fully fielded and parsed CSR:* As covered in my previous testimony in this docket, BellSouth is in compliance with nondiscriminatory access to customer service record information, and currently provides to CLECs the same stream of data that it provides to its own retail units. CLECs can parse that data stream on the CLECs' side of the interface, if they choose to do so. However, in response to a CLEC change request, BellSouth has targeted implementation of this additional parsing capability in January 2002.

4) *BellSouth must implement real-time ordering using what is known as the interactive agent:* MCI/WorldCom requested this functionality in 1998, only to request a postponement in February 1999. MCI/WorldCom submitted a change request for this functionality in September 2000, and the other CLEC members of the Change Control Process prioritized it 21st out of 36 change requests in the April 25,

2001 ranking tally. Further development of this feature has been suspended due to the low prioritization by the CLEC community.

5) *BellSouth must increase the time to correct rejected LSRs from 10 days to at least 30 days:* BellSouth's witness Ken Ainsworth has provided in his rebuttal testimony the fallacy of MCI/WorldCom's assertions on this point, but I would like to point out the irony of MCI/WorldCom's position in that it (and other CLECs) constantly complain that BellSouth does not do things fast enough, and here MCI/WorldCom wants its end users to wait 30 days to have a request processed.

Change Management

Q. MS. LICHTENBERG COMPLAINS ON PAGES 8-9 THAT BELLSOUTH'S CHANGE MANAGEMENT PROCESS NEEDS REVISIONS. PLEASE COMMENT.

A. First, I have addressed Ms. Lichtenberg's concerns about BellSouth's change management process in my rebuttal testimony filed on July 30, 2001, so I will not repeat all of that testimony here. 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 [or in this case, MCI/WorldCom] believes that the escalation process yields insufficient progress, then AT&T [or in this case, MCI/WorldCom] may file a complaint against BellSouth with this Commission."

Further, the very nature of BellSouth's change management process (known as the Change Control Process, or CCP) anticipates changes to systems and processes, or to the CCP itself. It is an evolving and collaborative effort between the CLECs and BellSouth. A number of Commissions in the BellSouth region that have dealt with the CCP in various arbitrations, as well as KPMG in the Georgia Third Party Test, have confirmed that the CCP meets the appropriate criteria for a change management process. If MCI/WorldCom has any specific issues with the CCP, MCI/WorldCom should follow the dispute resolution process as outlined in the CCP.

There have been issues regarding CCP performance that CLECs (notably MCI/WorldCom and AT&T) have brought up in this and other dockets, particularly regarding alleged preferential implementation treatment of BellSouth change requests over those of CLECs, and delays in providing acknowledgements and acceptance of CLEC change requests. What I would like to point out are some examples of current performance within the CCP that shows that BellSouth is committed to the CCP – and its evolution and improvement.

Q. WHAT IS THE TRACK RECORD OF THE CCP AS IT RELATES TO IMPLEMENTATION OF CLEC- AND BELLSOUTH-INITIATED CHANGE REQUESTS?

A. First, I would like to reiterate what I said in my previous rebuttal testimony on this issue. Regardless of who submits the change request, the CLECs benefit, and the CLECs have the opportunity to participate in the prioritization process of all CLEC- and BellSouth-initiated requests (Types 4 and 5, as defined in the CCP document), as well as those submitted as changes due to industry-standard changes (Type 3, as defined in the CCP document). This should not be considered a stroke-tally contest. As further justification, some change requests were issued by BellSouth on behalf of CLECs because the CLECs refused to do the paperwork associated with the request. Such requests are counted as BellSouth requests, yet are truly CLEC-initiated. I offer for example, two recent change requests submitted by BellSouth in response to the development of electronic ordering capability of Frame Relay and Primary Rate ISDN by BellSouth's retail unit. In order to give the CLECs the same capability, change requests were issued on their behalf by BellSouth, and the CLECs will have the chance to prioritize them. Again, these change requests will "count" as BellSouth change requests, but the beneficiaries are the CLECs – if they prioritize them as important.

As a matter of fact, since the inception of BellSouth's CCP, 29 CLEC-initiated change requests for new functionality have been implemented, and 29 BellSouth-initiated change requests for new functionality have been implemented. Additionally, over 100 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 over 160 total implemented changes validates the actual impact of that process.

There are currently (as of September 6, 2001) a total of 112 change requests existing in various statuses within the CCP. Of that total, 70 are CLEC-initiated, and 40 are BellSouth-initiated (3 of which are regulatory mandates and one of which is an industry-standard change request). Here is a further breakdown of those requests as of September 6, 2001.

34 Requests are in **'New'** Status (30 CLEC, 4 BellSouth)

- 8 are being reviewed for acceptance
- 10 have been reviewed and BellSouth has provided reason for inability to support (waiting on CLEC response)
- 6 have been reviewed and denied, and are currently in the appeal process
- 7 have been reviewed and CLECs have asked BellSouth to revisit (will be put into appeal process)
- 2 are under investigation by subject matter expert
- 1 is an ongoing request currently being worked within the CCP (CR0171 – Modify CCP Document – Issued by AT&T), and is a subject of the Process Improvement sub-team that has been addressing requested changes to the CCP and the Document since late 2000. Six voting ballots (with a seventh pending) 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

21 Requests are in **'Pending'** Status (10 CLEC, 7 BellSouth, 3 Regulatory Requests, 1 Industry Change Request) – Will be prioritized by CLECs at next Change Review Meeting

4 Requests are in **'Pending'** Status (4 CLEC) – With outstanding issues that need resolution before these can be prioritized

42 Requests are in **'Candidate Request'** Status (25 CLEC, 17 BellSouth) Have been prioritized by CLECs, and are eligible for sizing and sequencing into future releases

10 Requests are in **'Scheduled'** Status (2 CLEC, 6 Defect change requests, 2 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 2 responses to requests missed the BellSouth 20-day response interval.

Q. WOULD YOU PLEASE PROVIDE THE CCP'S PERFORMANCE INFORMATION ON RESPONSE INTERVALS FOR CLEC CHANGE REQUESTS?

A. Certainly. Since April 2000, CLECs have issued 244 Types 2-5 (functionality) change requests and 191 Type 6 (defect) change requests. Of the 244 Types 2-5 requests, 95% were acknowledged within the three-day interval that BellSouth is allowed under the CCP guidelines. BellSouth achieved the 20-day accept/reject interval on 90% of the 244 requests.

In the category of Type 6 defect requests, BellSouth has three days in which to validate the request as a defect, and to provide a response to the CLEC. Of the 191 CLEC Type 6 requests, BellSouth met the 3-day interval 81% of the time, missing on 37 of the requests. However, there were extenuating circumstances. One CLEC issued 19 of the 37 defect requests in ONE day, which was simply too many to validate simultaneously within three days. BellSouth informed the CLEC that the 3-day interval would be missed. Without that anomaly, BellSouth would have achieved a 91% response interval-met rate within this category, and BellSouth believes that this represents a truer picture of performance in this area.

Q. MS. LICHTENBERG COMPLAINS ON PAGE 9 ABOUT THE PRIORITIZATION PROCESS. PLEASE RESPOND

A. In spite of her claims, the CCP prioritization process does allow CLECs to be involved in the prioritization of all CLEC-impacting change requests. A CLEC-impacting change request is defined as “any change that either requires the CLEC to modify the way it operates or causes it to rewrite system code,” and covers Types 3, 4 and 5 change requests as defined in the CCP document. Other types of necessary changes to BellSouth's OSS – such as regulatory mandates and defects (Types 2 and 6) – are not subject to the CCP prioritization process. Necessarily, implementation of these types of changes have priority over other changes that are considered enhancements, and typically require some percentage of programming capacity in each release implemented by BellSouth.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

RMP-1 Line Loss Report.txt

From: Reynolds, Pamela
To: amanda.hill@wcom.com; patricia.B.woods@wcom.com
Cc: Hyman, Marilyn; Ragsdale, Kathy; Reynolds, Pamela; Waters, Shannon
Subject: Line Loss Report

Amanda,
Here is the result of the BST investigation on Line Loss Report.

Telephone #	Date of Install	Date of Disconnect	Line Loss Rpt appearence dates	Date NDM file snt *to MCI
1. 4042413169	6/13	6/29	6/30 - 7/6	06/30
2. 4043490504	6/14	6/28	6/29 - 7/5	06/29
3. 4043492056	S003219991BSGAPR SUP RECV TO CANCEL			
4. 4043700252	6/14	6/22	6/23 - 6/29	06/23
5. 4047581258	6/22	6/26	6/27 - 7/3	06/29
6. 4047613326	6/14	7/06	7/7 - 7/13	07/07
7. 4047920664	6/13	6/14	6/14- 6/20	06/14

Currently working for MCIMetro; Viewed CSR in LENS;Order posted 6/13

8. 4047942712	6/14	6/28	6/29 - 7/5	06/25
9. 6785130298	6/14	6/28	6/29 - 7/5	06/29
10.6785602452	6/14	6/15	6/16 - 6/22	06/26

* Line Loss notification posts to the web the day after Disconnect posts
complete and appears for 7 calendar days.

I hope this investigation answers your questions about the Line Loss Report.
Thanks Pamela.

Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH		
		LEO					LESOG										
			Mechanized Interface Used				Manual	Rejects		Validated	Errors						
Month	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Achieved Flowthrough	Base Calculation	CLEC Error Excluded Calculation
UNE																	
June AS REPORTED			0	18665	0	18665	3331	2245	7	13082	1959	1517	442	11123	69.64%	85.03%	88.00%
Adustments							-2745				2745	0	2745				
Revised			0	18665	0	18665	586	2245	7	15827	4704	1517	3187	11123	84.10%	70.28%	88.00%

BellSouth Telecommunications, Inc.
Kentucky PSC Case No. 2001-105
Exhibit RMP-2