

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 Alphonso J. Varner, 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 16 pages and 1 exhibit(s).


Alphonso J. Varner

SWORN TO AND SUBSCRIBED BEFORE ME this
1st day of September, 2001.


NOTARY PUBLIC

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

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 SUPPLEMENTAL REBUTTAL TESTIMONY OF ALPHONSO J. VARNER
3 BEFORE THE COMMONWEALTH OF KENTUCKY
4 PUBLIC SERVICE COMMISSION
5 CASE NO. 2001-105
6 FILED SEPTEMBER 10, 2001
7
8

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

12
13 A. My name is Alphonso J. Varner. I am employed by BellSouth as Senior
14 Director in Interconnection Services. My business address is 675 West
15 Peachtree Street, Atlanta, Georgia 30375.

16
17 Q. ARE YOU THE SAME ALPHONSO J. VARNER WHO FILED REBUTTAL
18 TESTIMONY IN THIS PROCEEDING?

19
20 A. Yes I am.

21
22 Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

23
24 A. The purpose of my Supplemental Rebuttal Testimony is to respond to
25 Supplemental Rebuttal Testimony filed by AT&T witness Ms. Sharon

1 Norris on August 27, 2001.

2

3 Q. ON PAGE 3 OF HER SUPPLEMENTAL TESTIMONY, MS. NORRIS
4 ALLEGES FOUR REASONS WHY BELLSOUTH CANNOT ESTABLISH
5 THAT ITS REPORTED DATA IS ACCURATE? WOULD YOU COMMENT
6 ON THIS ALLEGATION?

7

8 A. Yes. These four reasons why she alleges that BellSouth's reported data
9 is inaccurate are further examples of the CLECs' over-reaching attempts
10 to block BellSouth's 271 approval. However, Ms. Norris' testimony fails to
11 support her claims, as I will illustrate in this testimony.

12

13 Q. ON PAGE 4 OF HER TESTIMONY, MS. NORRIS IMPLIES THAT
14 PENALTY PAYMENTS IN GEORGIA INDICATE POOR
15 PERFORMANCE. CAN YOU ADDRESS THESE PAYMENTS?

16

17 A. Yes. Except for two instances, which I describe later, the penalties that
18 BellSouth paid in Georgia are the result of random occurrences or flawed
19 measurements. The two instances where systems problems exist were
20 confined to a few submetrics and have been corrected. The following
21 describes the reasons that the payments do not indicate a performance
22 deficiency.

23

1 Tier 1 Penalties for March and April

2 1) LNP Average Disconnect Timeliness (\$2.3M): No performance
3 deficiencies are indicated by this measurement because it is
4 flawed as I will describe later. BellSouth filed a *Motion to*
5 *Modify the Service Quality Measures* with the Georgia
6 Commission indicating that this metric is inadequately defined
7 and proposing several alternative metrics to either augment or
8 replace the existing one. As a result of BellSouth's motion, the
9 Georgia Commission requested that BellSouth report
10 performance results for the following three additional LNP
11 conversion metrics, and to continue to report results for a
12 modified LNP Average Disconnect Timeliness metric:

- 13 • Percent Out of Service < 60 Minutes
- 14 • Percentage of Time BellSouth Applies the 10-digit
15 Trigger Prior to the LNP Order Due Date
- 16 • LNP Average Disconnect Timeliness for Non-Trigger
17 Orders

18 These new metrics are reported beginning with June results,
19 and payments under all LNP measurements, from June forward,
20 will be held in escrow until the conclusion of the six month
21 review. At that time, the Georgia Commission will rule on the
22 penalties to be paid to the CLECs. Clearly, the Georgia
23 Commission does not share Ms. Norris' opinion that these
24 payments indicate a performance deficiency.

25

- 1 2) Order Completion Interval – Loop Port Combos (\$1.6M): These
2 penalties are the direct result of two problems. First, in March
3 data, a legacy systems coding problem assigned certain “non-
4 dispatch” orders the longer “dispatch” order installation interval.
5 BellSouth implemented an interim process to identify, review,
6 and correct these orders in late March and plans to deploy a
7 permanent mechanized fix in October 2001. The results of the
8 interim process are reflected in better performance after March.
9 This performance problem has been identified and corrected. In
10 addition, for all months, BellSouth was incorrectly including
11 orders where the CLEC requested a longer than normal due
12 date in OCI. This practice understates BellSouth’s performance
13 and an increase in training has been undertaken to address it.
14
- 15 3) Order Completion Interval – POTS (\$1.5M): These penalties
16 were caused by the same issues described under Order
17 Completion Interval-Loop/Port Combos
18
- 19 4) Customer Trouble Report Rate – UNE Loops (\$0.7M): Once
20 again, BellSouth met the standard for CLEC aggregate
21 performance in Georgia. These Tier 1 payments represent
22 random occurrences, not a systemic performance problem.
23
- 24 5) Other Tier 1 Metrics (\$0.9M): Except for FOC/Reject
25 Completeness (\$0.1M), the penalties for the other SEEM sub-

1 metrics are the result of a number of small payments to
2 individual CLECs on measurements for which BellSouth
3 generally meets the CLEC aggregate performance standards.
4 BellSouth has already acknowledged that the FOC/Reject
5 Completeness measurement was unreliable in March, April, and
6 May and incorrectly understates BellSouth's performance.
7 Thus, no systemic performance problems have been identified.
8

9 Q. ON PAGE 4 OF HER TESTIMONY, MS. NORRIS FURTHER IMPLIES
10 THAT GEORGIA PENALTIES INDICATE THAT MAY 2001
11 PERFORMANCE IS POOR. PLEASE EXPLAIN.
12

13 A. Three of the same SEEM sub-metrics discussed for March and April also
14 drove 88% (\$4.4M of \$5.0M) of the May penalty payments, and for the
15 same reasons described above:

- 16 • LNP Average Disconnect Timeliness (\$3.4M)
 - 17 • Order Completion Interval – Loop+Port Combo (\$0.7M)
 - 18 • Order Completion Interval – POTS (\$0.3M)
- 19

20 Note that the customer trouble report rate payments have declined
21 substantially. This penalty, as well as the remaining penalties for May, are
22 for random individual CLEC occurrences for measures. The aggregate
23 performance standard is usually met. Consequently, the only systemic
24 performance problem identified (OCI-COMBO POTS) has been corrected.
25

1 Q. ON PAGES 4-5 OF HER TESTIMONY, MS. NORRIS ADDRESS TIER 2
2 PENALTIES. HOW DO YOU RESPOND?

3

4 A. Again, three SEEM sub-metrics account for 97% (\$8.0M of \$8.2M) of
5 these Tier 2 payments to the state of Georgia. Two of the sub-metrics,
6 LNP Average Disconnect Timeliness, which is flawed as discussed earlier,
7 and Order Completion Interval – POTS, were discussed under Tier 1. The
8 same conditions applicable for these measures under Tier 1 also apply
9 under Tier 2. The third measurement, OSS Average Response Interval, is
10 confined to one system, HAL/CRIS, which is accessed via the LENS
11 interface. That interface was returning responses in 13 seconds
12 compared to its retail analog of 4 seconds. The system fix for this problem
13 was implemented on July 27, 2001. As discussed later, the system fix has
14 resolved this issue.

15

16 In summary, most of the Tier 1 and Tier 2 penalty payments (over 85%)
17 are confined to three or four measurements. For those two measures
18 where a system problem was indicated, the problem has already been
19 fixed. This SEEM data provides no basis for claiming discriminatory
20 performance.

21

22 Also, Ms. Norris' testimony in this area contradicts much of the remainder
23 of her testimony. Much of Ms. Norris' testimony is devoted to convincing
24 the Commission that BellSouth's measurement data is unreliable.
25 However, when it comes to penalties, she accepts that same performance

1 data as reliable enough to draw conclusion about BellSouth's
2 performance. Ms. Norris can't have it both ways.

3

4 Q PLEASE EXPLAIN FURTHER WHY THE LNP DISCONNECT
5 TIMELINES MEASURE IS FLAWED?

6

7 A. The current measure: (1) does not accurately capture the customer's
8 experience when the customer's telephone number is ported; and (2)
9 includes activities in the porting process over which BellSouth has no
10 control.

11

12 As the Commission is aware, LNP allows a customer to keep his or her
13 telephone number when telephone service is transferred from one local
14 exchange company to another within the same calling area. The number
15 portability feature works by utilizing a centralized database that houses all
16 ported numbers and provides proper routing of calls to and from these
17 numbers. When an order involving LNP is being worked to port a
18 telephone number from BellSouth to the CLEC, both BellSouth and the
19 CLEC must take certain actions in order to enable the CLEC's new end
20 user to make and receive calls using the ported number.

21

22 On a great majority of LNP orders, BellSouth creates what is referred to as
23 a "trigger" in conjunction with the order. This trigger gives the end user
24 customer the ability to receive calls from other customers who are served
25 by the customer's host switch at the time of the LNP activation. This

1 ability is not dependent upon BellSouth working a disconnect order. In
2 other words, when a trigger is involved, an end user customer can receive
3 calls from other customers served by the same host switch before the
4 disconnect order is ever worked.

5
6 On trigger orders, end user customers also can receive calls from
7 customers not served by the same host switch before BellSouth works the
8 disconnect order. Because all of the switches in the BellSouth network
9 other than the host switch are updated via routing data that is delivered to
10 each of BellSouth's Service Control Point ("SCP") databases. These
11 routing messages are delivered by a system known as LSMS, which is
12 operated by and under the control of BellSouth. Thus, the end user has
13 the full ability to make and receive telephone calls on ported numbers
14 involving a trigger as soon as the LSMS message is sent to all SCPs,
15 even though BellSouth has not yet disconnected the customer from its
16 translations in the BellSouth host switch.

17
18 However, as it currently exists, Performance Measure, P-13, does not
19 recognize the importance of triggers and their effect on the LNP process
20 even though such orders account for 90% of LNP orders. Rather, the
21 current measure calculates the end time of the LNP activity as the
22 processing of the actual disconnect order in the host switch, even though,
23 from a customer's perspective, this activity is totally meaningless. It is the
24 activation of the LNP and the routing function accomplished by the LSMS
25 that ultimately determines whether the end user is back in full service and

1 is able to make and receive calls when a trigger is used in porting a
2 telephone number. So, while BellSouth may be missing this measure, the
3 actual impact on CLECs and their end users, is minimal.

4
5 As discussed earlier, the Georgia Commission has ordered new
6 measurements due to the problems with the current measure and has
7 suspended SEEM payments for it.

8
9 Q. YOU HAVE MENTIONED FOC/REJECTION COMPLETENESS AND LNP
10 DISCONNECT TIMELINESS AS UNRELIABLE, ARE THERE OTHER
11 MEASURES THAT YOU WOULD LIKE TO ADDRESS?

12
13 A. Yes. Unlike FOC/Reject Completeness and LNP Disconnect Timeliness,
14 which understate BellSouth performance, one other measurement
15 overstates relevant performance. That measurement is Jeopardy Notice
16 Interval (P-2). As originally designed, Jeopardy Notice Interval is
17 calculated based on the date the jeopardy is cleared instead of the original
18 due date. However, it is more relevant to report the interval between
19 issuance of the jeopardy and the original due date of the order.
20 Programming changes are planned in October 2001. Meanwhile, this
21 measurement provides little useful data for the Commission to rely on to
22 evaluate performance.

23
24 There are two other measurements that, although useful, could result in the
25 Commission overrating BellSouth's performance by using them. P-9

1 Percent Provisioning Troubles in 30 days is overstated per a KPMG
2 exception by about 0.1% (.001). Also, we did not move the timestamps for
3 OSS interfaces as defined in the OSS Response Interval Measure until
4 July data. Thus, the retail analog for May and June should be increased by
5 2 seconds.

6
7 Q. ON PAGE 5 OF HER TESTIMONY, MS. NORRIS ARGUES THAT
8 BELLSOUTH'S PERFORMANCE IS DEFICIENT AS BELLSOUTH MET
9 COMPARISON CRITERIA FOR 85% OF SUB-METRICS IN MAY 2001
10 AND 87% OF SUB-METRICS IN JUNE 2001.

11
12 A. Simply making this comparison does not alone evaluate BellSouth's
13 performance, as I discuss in my testimony accompanying the data filings,
14 the significance and cause of any misses. Instead of just looking at those
15 statistics, it is more illuminating to look at the causes of the missed
16 standards. Looking at the analyses we filed, some of the reasons for
17 missed standards include:

18 Low volume makes data inconclusive,

19 Transactions that should be excluded,

20 Human error in execution, and

21 Programming changes for the measurements.

22 Also, in many cases, the level of performance was very high, just not quite
23 high enough to pass the standard. More importantly, there are only a
24 couple of instances where a systemic problem in BellSouth's processes
25 was indicated and BellSouth has already fixed those as I discussed

1 earlier. Overwhelmingly, where sufficient data exists, the data confirms
2 that BellSouth's processes are providing nondiscriminatory performance
3 for CLECs.

4

5 Q. ON PAGES 5-6 OF HER TESTIMONY, MS. NORRIS SAYS THAT
6 CLECS CANNOT CONFIRM THAT THE LENS ISSUE DISCUSSED IN
7 VARNER SUPPLEMENTAL TESTIMONY HAS BEEN FIXED.

8

9 A. The LENS customer service record (CSR) query response time
10 performance deficiency was corrected on July 27, 2001, with the
11 implementation of a new information retrieval architecture. The
12 information flow no longer relies on the outdated HAL or BOCRIS systems
13 to process and return the requested CSR information via the LENS
14 interface. There is now a direct feed to and from the CRIS system, which
15 results in faster return times. Once the system architecture was revised,
16 BellSouth began returning CSRs through LENS in an average of 1.01
17 seconds (6 days of data), which is well below the retail analog results of
18 3.68 (RNS) and 3.17 (ROS) and 3.66 (RNS) and 3.23 (ROS) seconds
19 posted for May and June 2001. Due to the fact that this problem existed
20 for several months, BellSouth put together a special study to validate the
21 impact of the fix and monitor the results. (Exhibit AJV-19.) The results of
22 the system change will be reflected with the Kentucky August MSS on or
23 about October 10, 2001.

24

25 Q. ON PAGES 7-9 OF HER TESTIMONY, MS. NORRIS ALLEGES

1 CONFUSION IS CAUSED BY THE REPOSTING OF SOME MAY AND
2 JUNE PERFORMANCE REPORTS. PLEASE RESPOND.

3

4 A. Ms. Norris overstates the degree of reposting. In May, BellSouth made
5 minor changes to the MSS, requiring the reposting of only two metrics
6 (FOC/REJ Completeness and ACNI). As previously stated the FOC/REJ
7 completeness measure is unreliable anyway. BellSouth changed the
8 yes/no response for three OSS measures due to a clerical error. This
9 change had no impact on the data itself. Also Line Sharing Data for
10 certain provisioning measures was originally omitted in May and reported
11 later. The magnitude of changes when compared to the overall volume of
12 metrics produced did not materially impact the CLECs' ability to review
13 and/or use the performance data.

14

15 For the CLEC-specific reports in PMAP, May was the first month in which
16 BellSouth reported results for several new Georgia-ordered metrics and
17 product disaggregations, as well as CLEC-specific reports and raw data
18 across all of the sub-metrics. This resulted in the need for the reposting of
19 specific reports. Generally, only 1-2 reports get reposted in a month,
20 however recent activity to include all Georgia SQM disaggregations has
21 resulted in additional updates. BellSouth notifies all affected CLECs of the
22 reposting as soon as it occurs so that they are aware that their records
23 may have been changed. BellSouth wishes to ensure that CLECs have
24 the most accurate data available for the month.

25

1 The metrics and sub-metrics that BellSouth was ordered to produce for
2 May results (in accordance with the implementation timeframe) are
3 voluminous (over 2,200) and extremely complex. In fact, BellSouth was
4 forced to pull up the schedule for the development and production of these
5 metrics by three full months in order to comply with the order. As a result
6 of the schedule, BellSouth was faced with a decision to post the results in
7 a timely manner, despite a continuing validation results process, or delay
8 the posting of results until full validation had been completed. Given our
9 expectation that the changes would be minimal or nonexistent, BellSouth
10 decided to give the CLECs the data as soon as possible.

11

12 The June 2001 MSS in Georgia was reposted to add line sharing
13 provisioning data and the recalculation (affected four charts) of the retail
14 analog "ADSL to Retail."

15

16 Q. ON PAGE 10 OF HER TESTIMONY, MS. NORRIS NOTES THAT THE
17 JULY 10 REVISED DATA RESULTED IN A SIGNIFICANT COMPLIANCE
18 SHIFT IN 7 METRICS. SPECIFICALLY, IN 5 CASES, BELLSOUTH
19 REPORTS ITS PERFORMANCE CHANGED FROM NON-COMPLIANT
20 TO COMPLIANT AND IN 2 CASES, ITS PERFORMANCE WENT FROM
21 COMPLIANT TO NONCOMPLIANT. PLEASE DISCUSS.

22

23 A. Of course when data errors are corrected, the status of whether BellSouth
24 met the standard may change. The only reason that BellSouth posted this
25 revised data was to correct errors or omissions discovered in previously

1 filed data. Regardless of the reason for the error, or how the error was
2 discovered, the revised, posted results reflect corrected data. The fact
3 that these corrections shift compliance in either direction is irrelevant. I
4 certainly hope that Ms. Norris is not trying to imply that BellSouth would
5 knowingly revise data simply to improve its performance, particularly since
6 she offers absolutely no evidence on which to base such a demeaning
7 implication. Also, it makes no sense to revise the data and not revise the
8 indicator of whether the standard was met.

9

10 Q. ON PAGE 10 OF HER TESTIMONY, MS. NORRIS STATES THAT
11 BELL SOUTH'S REPORT FOR LOOP MAKE-UP RESPONSE TIME –
12 ELECTRONIC REPORTS THAT 100% OF THE RESPONSES WERE
13 RETURNED IN UNDER 5 MINUTES BUT ALSO THAT THE AVERAGE
14 RESPONSE INTERVAL WAS 16 MINUTES AND 85 SECONDS.
15 PLEASE EXPLAIN THE DISCREPANCY.

16

17 A. The report in question was not clearly formatted and has been adjusted for
18 the June data. In fact, the header for the Average Interval column should
19 have read (min:sec.hundredths of a second) in the header and the data
20 within the column, in this case, should read 0:16.85. That is, BellSouth's
21 systems were responding within the required time of less than one minute.
22 Specifically, they were responding in 16.85 seconds in Georgia and in 16
23 seconds for the region.

24

25 Q. ON PAGE 10 OF HER TESTIMONY, MS. NORRIS CLAIMS THAT THE

1 MAY 2001 DATA FOR TWO DIFFERENT TYPES OF PRODUCT
2 DISAGGREGATIONS, LOOP/PORT COMBINATIONS AND THE
3 UNE/OTHER NON-DESIGN, ARE IDENTICAL FOR THE FOLLOWING
4 MEASURES: % REJECTED SERVICE REQUESTS, REJECT
5 INTERVAL, FOC TIMELINESS, FOC AND REJECT RESPONSE
6 COMPLETENESS. PLEASE DISCUSS.

7

8 A. The numbers represent the same orders, but this situation is
9 inconsequential. The Loop/Port Combo and Other Non-Design product
10 aggregations for ordering measures contain one common product,
11 Combos – Loop + Port. Of all of the products that are rolled into these two
12 product aggregations, the only one that had data on this particular MSS
13 (GA May 2001) was Combos – Loop + Port (Ordering). Consequently,
14 the two product aggregations had the same volume across the ordering
15 metrics. With July data, Loop + Port Combos will be removed from the
16 Other Non-Design category.

17

18 Q. FURTHER, ON PAGE 11 OF HER TESTIMONY, MS. NORRIS STATES
19 THAT IN BELLSOUTH'S MAY AND JUNE 2001 KENTUCKY
20 PERFORMANCE REPORTS, THE DATA FOR UNE LOOP AND PORT
21 COMBINATIONS IS REPORTED TWICE AND THAT THIS DOUBLE
22 REPORTING OF DATA AFFECTS THE RELIABILITY AND ACCURACY
23 OF AS MANY AS 15 SUBMEASURES. PLEASE RESPOND.

24

25 A. Ms. Norris is simply repeating the same situation addressed in the

1 previous answer and making a different claim. The claim, that the data
2 appears in two disaggregations, does not affect the accuracy. As I said
3 earlier, both disaggregations reflect the same product, Loop + Port
4 Combos. So the data should be the same and is accurately reported.
5

6 Q. ON PAGES 11-12 OF HER TESTIMONY, MS. NORRIS CRITICIZES
7 THREE METRICS THE COMMISSION CAN'T RELY ON. PLEASE
8 RESPOND.
9

10 A. BellSouth and the Commission are aware of the metrics that require
11 adjustments and these have been discussed earlier in my testimony. To
12 summarize, the LNP Disconnect Timeliness metric is a flawed metric that
13 cannot be relied upon at this time. In addition, FOC/Reject Completeness
14 understates BellSouth performance and Average Jeopardy Notice Interval
15 overstates performance. The Commission is aware of the corrections
16 needed and these metrics are unreliable at this time. The key point in
17 BellSouth's investigation, however, is that BellSouth has not uncovered
18 any evidence to indicate that orders are being lost. Further, Ms. Norris
19 does not claim, nor can she claim that orders are being lost. Thus, while
20 the metric itself is being refined, there is no evidence that BellSouth is
21 losing orders.
22

23 Q. ON PAGES 12-13 OF HER TESTIMONY, MS. NORRIS QUESTIONS
24 THE MISSED APPOINTMENTS METRIC (MIA) AND AVERAGE

1 COMPLETION NOTICE METRIC (ACNI) FOR SPECIFIC PRODUCTS
2 ON THE MSS. PLEASE EXPLAIN THE DIFFERENCE.

3

4 A. The ACNI metric should not necessarily match MIA exactly because of
5 timestamp differences. There can always be a difference between the two
6 measures.

7

8 In addition, partially mechanized orders were not included in the
9 Completion Notice Measure until June, 2001 data. This fact is clearly
10 indicated on the MSS.

11

12 Q. ON PAGES 13-14 OF HER TESTIMONY, MS. NORRIS NOTES THAT
13 THE % REJECTED SERVICE REQUEST, FOC/REJECT
14 COMPLETENESS, AND FOC/REJECT RESPONSE COMPLETENESS
15 MEASURES ALL USE THE SAME DENOMINATOR, THE NUMBER OF
16 LSRS RECEIVED. HOWEVER FOR UNE-P AND LNP (STAND-ALONE)
17 IN MAY, THE VOLUMES DO NOT MATCH. PLEASE EXPLAIN.

18

19 A. The FOC and Reject Response Completeness metric is a new metric that
20 has only been available since the March 2001 data. BellSouth has
21 already acknowledged that this measure is incorrect and asks the
22 Commission not to rely upon it. Regarding resolution, BellSouth identified
23 a data capture issue with this metric, which was corrected in April 2001.
24 Specifically, particular classes of rejected service requests, auto
25 clarifications, were not being picked up. However, further investigation

1 and code modifications are required to report the results more accurately.
2 Consequently, BellSouth does not rely on this measurement to evaluate
3 performance at this time.

4

5 Q. ON PAGE 15 OF HER TESTIMONY, MS. NORRIS ARGUES THAT THE
6 FOC/REJECT RESPONSE COMPLETENESS RAW DATA IS NOT
7 INCLUDED IN THE FOC AND REJECT RAW DATA FILES. WHY IS
8 THIS?

9

10 A. As stated before, the FOC/Reject Completeness metric is incorrect and
11 further modifications are required before it can be relied on for accurate
12 results.

13

14 Q. PLEASE ADDRESS THE DATA CAPTURE ISSUE THAT MS. NORRIS
15 ADDRESSES ON PAGE 16.

16

17 A. Ms. Norris is referring to the FOC Timeliness for LNP Standalone and
18 Reject-Interval residence and Reject Interval-business submeasures that
19 BellSouth spoke of in prior testimony. To explain, the performance in
20 these sub-metrics was previously understated due to BellSouth's inability
21 to capture data regarding multiple issues of the same LSR that could have
22 been rejected.

23

24 BellSouth has responded to this Florida observation for UNE FOC
25 Timeliness via TAG. During the initial test, BellSouth's performance

1 reflected 93% of FOCs returned within the requisite 3 hour timeframe (192
2 of 206). Further investigation shows that of the 14 “misses”, 1 LSR was
3 Partially Mechanized, and its FOC was returned timely, within the 24 hour
4 timeframe. The remaining 13 FOCs were also returned timely, however,
5 KPMG’s own notification server failed, and therefore, KPMG was not able
6 to capture the response on its end of the system. Therefore, BellSouth’s
7 performance was outstanding, and this observation does not support
8 ATT’s claim that performance is poor.

9

10 Q. ON PAGE 17 OF HER TESTIMONY, MS. NORRIS STATES THAT
11 BASED ON MAY 2001 DATA THERE ARE MORE THAN 350 PONS
12 MISSING ON A SINGLE REPORT FOR OCN 7125. PLEASE EXPLAIN.

13

14 A. Ms. Norris has elected not to provide any data to verify or substantiate her
15 claim. Without a list of PONS to analyze, BellSouth cannot research this
16 claim. However, we have no indication that such an event occurred. I
17 should point out that AT&T has claimed erroneously that PONS were
18 missing when in fact they were properly excluded because AT&T coded
19 them as projects, or they were ‘L’ coded, among other valid exclusions.
20 KPMG has confirmed on their CLEC call on August 16, 2001, that AT&T
21 erroneously engaged in this practice.

22

23 Q. ON PAGE 17 OF HER TESTIMONY, MS. NORRIS SAYS THAT THE
24 REVIEW OF THE PROVIDED LNP RAW DATA FOR ONE MEASURE
25 DETERMINED THAT 406 PONS WERE MISSING FROM BELL SOUTH’S

1 MAY 2001 RAW DATA. PLEASE RESPOND?

2

3 A. Of the 406 missing PONS that AT&T identified in the LNP FOC Timeliness
4 report, all but 5 were properly excluded because AT&T classified them as
5 “projects” which are properly excluded in accordance with the SQM. The
6 remaining 5 PONS that are not classified as project-managed were
7 appropriately excluded due to one of the following reasons: mismatches
8 in the LON table (3 PONS), order type (1 PON had two orders issued, an
9 ‘N’ and a ‘D’, both of which were excluded for REQ TYP ‘C’ since they are
10 directory listing and disconnect orders only), and request type (1 PON was
11 clarified twice and then cancelled).

12

13 Q. ON PAGES 17-18 OF HER TESTIMONY, MS. NORRIS NOTES THAT
14 THE MAY 2001 PERFORMANCE REPORTS OMITTED AT&T
15 BROADBAND DATA FOR OCN 7170 AND IT HAS YET TO BE
16 CORRECTED. WHY IS THIS AND WHEN WILL IT BE FIXED?

17

18 A. It should be noted that the statewide aggregate reports are accurate
19 because the data was in PMAP and was therefore included. In addition,
20 this issue has been fixed. AT&T Broadband’s data was in the raw data
21 files in PMAP; however, it was not correctly allocated to AT&T’s CLEC-
22 specific account. This was a clerical error that BellSouth has corrected for
23 July 2001 data. On August 28, 2001, all raw data files for OCN 7170 were
24 sent to K.C. Timmons at AT&T for the months of May and June. A new

1 database reconciliation process has been implemented to identify and
2 update new OCN/ACNAs as quickly as possible.

3

4 Q. HAVE YOU PROVIDED THE MANUAL COPIES OF THE AT&T
5 BROADBAND REPORTS THAT WERE REQUESTED ON JULY 10?

6

7 A. On August 28, 2001, all raw data files for OCN 7170 were sent to K.C.
8 Timmons at AT&T for the months of May and June. AT&T requested that
9 all PMAP reports for OCN 7170 for May and June also be provided, but
10 BellSouth explained that this was an unreasonable request due to the
11 volume of data involved. BellSouth offered to recreate specific reports
12 that AT&T wishes to see, however we have yet to hear back from AT&T
13 on this issue. It is important to note that AT&T is able to recreate all
14 PMAP reports using the raw data and the guide, if they so wish.

15

16 Q. MS. NORRIS ALSO INDICATES ON PAGES 18-19 THAT BELLSOUTH
17 EXCLUDES "DUMMY" FOCs FROM THE FOC TIMELINESS MEASURE.
18 WHY IS THIS?

19

20 A. "Dummy" FOCs are not actually firm order confirmations. An actual FOC
21 provides a date when the order will be completed and results in an order
22 for BellSouth to do work. BellSouth returns "dummy" FOCs in response to
23 CLEC requests to cancel service requests before the service order is
24 issued. The name "Dummy" FOC, which creates a means to
25 mischaracterize it, simply indicates that the CLEC is informed of the

1 cancellation in the same way that an FOC is returned. These documents
2 are returned simply as an acknowledgment to the CLEC that their request
3 to cancel the order was received and are not associated with either a firm
4 order confirmation or the issuance or cancellation of a service order.
5 Because “dummy” FOCs are not firm order confirmations, they are
6 properly excluded from the FOC Timeliness metric. However, as a result
7 of AT&T’s complaints, BellSouth is investigating the inclusion of “dummy”
8 FOCs in both the FOC Timeliness and FOC/Reject Response
9 Completeness metrics in future results reports. I should note that such
10 inclusions will improve BellSouth’s reported results because these
11 “dummy” FOC acknowledgments do not require the processing needed to
12 produce a real FOC.

13

14 Q. ON PAGE 19 OF HER TESTIMONY, MS. NORRIS IDENTIFIES THREE
15 AREAS IN WHICH BELL SOUTH ALLEGEDLY EXCLUDES DATA FROM
16 CERTAIN PERFORMANCE MEASUREMENT REPORTS. THESE
17 AREAS ARE DIRECTORY LISTINGS ORDERS, ORDERS CLASSIFIED
18 AS PROJECTS, AND LSRS SUBMITTED IN ONE MONTH AND
19 REJECTED IN ANOTHER. PLEASE ADDRESS THESE.

20

21 A. Ms. Norris has brought up these exclusions with specific examples in prior
22 testimony, so we can only assume that she is referring to the same reports
23 in this accusation. To summarize:

24

1 The % Reject Report from PMAP does not include LSRs identified as
2 REQ TYP 'JB' – Directory Listings orders in the % Rejected-Mechanized
3 measure. REQ TYP 'JB' identifies a Directory Listing LSR. Directory
4 listings were not identified as a disaggregated category in the Interim
5 SQM. Thus BellSouth appropriately did not disaggregate this data into a
6 separate report. The LSRs are included, however, in the Flow-Through
7 report.

8
9 The LNP FOC Timeliness report, excluded orders classified as “projects”
10 which are properly excluded in accordance with the SQM.

11
12 Finally, LSRs submitted in one month and rejected in another is not an
13 exclusion to the Reject Interval metric, but simply a difference in
14 interpretation. The report is supposed to reflect orders rejected in a given
15 month. Because rejects are returned so quickly, there are very few
16 orders with rejects in different months. For example a special analysis for
17 one month showed that the condition affected only one reject out of 79
18 total rejects. Consequently, there is no reason to believe that the overall
19 performance would vary for the subset of transactions and there is no
20 significant impact to the interval being recorded. Given the small impact
21 and the questionable nature of capturing data outside the month, the
22 additional coding to capture this data was not justified. Nonetheless, in
23 response to AT&T, a change request to include these rejects is in the
24 process of being worked by BellSouth and an update should be made with
25 the publication of August results.

1

2 Q. ON PAGES 20-21 OF HER TESTIMONY, MS. NORRIS DISCUSSES
3 THE SUGGESTION THAT LSRS SUBMITTED BETWEEN 11:00PM AND
4 4:00AM SHOULD BE EXCLUDED FROM THE REJECT
5 INTERVAL/COMBO (LOOP AND PORT) MECHANIZED AND THE
6 REJECT INTERVAL/OTHER NON-DESIGN MECHANIZED MEASURES
7 SINCE BACK-END LEGACY SYSTEMS ARE OUT OF SERVICE
8 DURING THESE TIMES. WHAT IS BEING DONE TO REMEDY THIS
9 SITUATION?

10

11 A. Efforts are underway to ensure that this “scheduled OSS downtime”
12 exclusion is fully incorporated into the results calculation methodology for
13 FOC Timeliness and Reject Interval. Legacy system downtimes prevent
14 BellSouth from meeting the required benchmarks and should be taken into
15 consideration when using the Reject Interval measure. The plan is to
16 have the fix completed for September data.

17

18 Q. ON PAGE 22, MS. NORRIS EXPRESSES CONCERN THAT THERE
19 ARE STILL OPEN EXCEPTIONS IN GEORGIA (86, 89, 136/137) THAT
20 WILL BE RETESTED USING JUNE 2001 PERFORMANCE DATA.
21 PLEASE COMMENT.

22

23 A. Any concern that Ms. Norris has should be minimal. To summarize,
24 Exception 86.1, which relates to a replication issue with Provisioning
25 Trouble within 30 Days was retested using both June and July

1 performance data. BellSouth's analysis shows that while the CLECs have
2 no discrepancies, the BellSouth retail dispatch bucket has a disparity of 12
3 records. This is a 0.10% difference for the bucket, which is statistically
4 insignificant. The outstanding records have been isolated and work is
5 being done to correct the situation. Exception 89.3, relating to raw data
6 used in the calculation of SQM reports, has completed testing for LENS, is
7 currently undergoing testing for ROS and RNS, and will test with the TAG
8 interface in mid-September. Exception 89.9, that relates to the Early
9 Stage data test for Provisioning Trouble within 30 Days, has been retested
10 internally with a very favorable outcome and KPMG will be retesting
11 shortly with July data. Finally, Exceptions 136 and 137, which deal with
12 data comparisons for Ordering and Provisioning SQM, are currently being
13 tested with June data.

14

15 Q. MS. NORRIS EXPRESSES CONCERNS THAT THERE ARE A NUMBER
16 OF OBSERVATIONS/EXCEPTIONS IN FLORIDA RELATING TO THE
17 CALCULATION OF PERFORMANCE MEASURES. SPECIFICALLY,
18 OBSERVATIONS/EXCEPTIONS 10, 11, 15, 22, 27, 36, 56, 78, AND 81.
19 PLEASE COMMENT.

20

21 A. The fact that an observation or exception has been opened does not
22 necessarily indicate that a data problem exists. Nonetheless, they will
23 ultimately be closed. Overall, the current status of the open exceptions is

1 not material and will have no impact on the ability of the Commission to
2 evaluate whether or not BellSouth has met its obligations under Section
3 271 of the Act.

4

5 Q. ON PAGE 23 OF HER TESTIMONY, MS. NORRIS SUMMARIZES THE
6 CURRENT FLORIDA THIRD PARTY TEST STATUS AND ARGUES
7 THAT UNTIL THE EXCEPTIONS IN THIS TEST ARE CLOSED, THE
8 COMMISSION CANNOT BE ASSURED THAT BELLSOUTH HAS
9 ADDRESSED ALL DEFICIENCIES.

10

11 A. The Commission is expected to rely on BellSouth's Georgia Third Party
12 Test to assist it in its evaluation of BellSouth's non-discriminatory
13 treatment of CLECs. The Georgia test has been shown to be at least as
14 comprehensive as other states' tests. (Of the 1171 independent tests
15 conducted by KPMG that Mr. Pate discusses, 420 were tests of
16 performance measurements. The scope of testing is very apparent when
17 the 420 tests conducted in Georgia is compared to 48 tests conducted in
18 New York.) Therefore, the status of the Florida Third Party Test is not
19 necessary.

20

21 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

22

23 A. Yes.

Operations Support Systems - Pre-Ordering

Average Response Interval - CLEC (LENS)

HAL/CRIS/Region (seconds)

(Average OSS Response Intervals)

Numerator indicates total number of OSS response intervals for this disaggregation in the reporting period.

Volume indicates total number of requests in the reporting period.

Event Date	Volume	Numerator	Avg. Sec
07/23/2001	33925	438888.801	12.93703172
07/24/2001	3671	48740.123	13.27706974
07/25/2001	35954	479126.634	13.32610096
07/26/2001	36715	485678.195	13.22833161
07/27/2001	28277	383375.18	13.55784489
07/28/2001	4066	1928.698	0.474347762
07/29/2001	10569	3867.358	0.365915224
07/30/2001	58009	87767.816	1.513003431
07/31/2001	49956	65890.856	1.31897782
08/01/2001	44416	51710.822	1.164238608
08/02/2001	46193	56376.966	1.220465568