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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

INVESTIGATION CONCERNING THE)
PROPRIETARY OF INTERLATA SERVICES)
BY BELLSOUTH TELECOMUNICATIONS,)   CASE NO. 2001-105
INC., PURSUANT TO THE)
TELECOMMUNICATIONS ACT OF 1996)

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GENERAL COUNSEL

PREFILED TESTIMONY

OF SHERRY LICHTENBERG

ON BEHALF OF WORLDCOM

July 9, 2001

C. Kent Hatfield, Esquire
Henry S. Alford, Esquire
MIDDLETON REUTLINGER
2500 Brown & Williamson Tower
Louisville, Kentucky 40202
(502) 584-1135

COUNSEL FOR WORLDCOM, INC.

| 1 | Q. | PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION. |

1　Q.　PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.

2　A.　My name is Sherry Lichtenberg. My business address is 701 S. 12th St., Arlington,

3　　　Virginia 22202. I am employed by WorldCom, Inc. in the Mass Markets local services

4　　　team as a Senior Manager. I will refer to the division of the company that offers local

5　　　residential service as "MCI."

6　Q.　PLEASE DESCRIBE YOUR EMPLOYMENT BACKGROUND.

7　A.　My job involves getting MCI into the local residential and small business market across

8　　　the United States. I have nineteen years experience in the telecommunications market,

9　　　four years with MCI and fifteen years with AT&T. Prior to joining MCI, I was Pricing

10　　　and Proposals Director for AT&T Government Markets, Executive Assistant to the

11　　　President, and Staff Director for AT&T Government Markets and had a number of

12　　　positions in Product and Project Management.

13　Q.　WHAT EXPERIENCE DOES MCI HAVE IN OPENING LOCAL MARKETS TO

14　　　RESIDENTIAL COMPETITION?

15　A.　To date, MCI has brought choice to consumers for their local residential service in six

16　　　states: New York, Texas, Pennsylvania, Michigan, Illinois and, just six weeks ago,

17　　　Georgia. MCI now has more than one million local residential customers nationwide.

18　Q.　WHAT IS THE PURPOSE OF YOUR TESTIMONY?

19　A.　The purpose of my testimony is to describe the launch of MCI's local residential service

20　　　in Georgia and to discuss some of the problems we have encountered thus far. To the

21　　　extent the Commission finds similarities between BellSouth's OSS in Georgia and

22　　　Kentucky, MCI's commercial experience in Georgia will be relevant to the

23　　　Commission's evaluation of BellSouth's Kentucky OSS. As I will discuss, our early

1   experience in Georgia demonstrates that BellSouth needs to make corrections to its OSS

2   before it can accommodate commercial volumes of orders. In this regard, I will respond

3   to the testimony of BellSouth witness Pate, who erroneously claims that BellSouth meets

4   checklist item (ii) as it relates to nondiscriminatory access to OSS.

5   I also will discuss BellSouth's change management, or change control, process.

6   As a result of the continuous evolution of the telecommunications industry, the interfaces

7   and processes by which CLECs interact with BellSouth must change as well. Change

8   management is the process by which CLECs and BellSouth determine which changes are

9   needed, and then implement those changes in such a manner that they do not have

10   significant negative impacts on CLECs. For example, a good change management

11   process will ensure that CLECs have sufficient notification of changes to an interface that

12   they are able to adapt to any such change.

13 **Q.**   **PLEASE DESCRIBE THE GEORGIA LAUNCH.**

14 A.   MCI recently has begun its launch of local telephone service to residential customers in

15   Georgia using UNE-P. MCI did so based on plans that had been in place for well more

16   than six months. MCI decided to attempt to enter the Georgia market using UNE-P

17   because the Georgia Commission made that entry vehicle available and has generally

18   been committed to forcing BellSouth to remove barriers to local entry. The scope and

19   viability of our entry have always been contingent on BellSouth correcting flaws that are

20   discovered in its OSS and proving that it can handle commercial volumes of orders. MCI

21   began submitting its initial UNE-P customer orders via EDI OSS 99 in early May and

1   then launched service on May 15, 2001. Through June 25, we have turned up more than

2   10,000 local residential lines.

3 Q. **WHAT WILL DETERMINE MCI'S ABILITY TO SUBMIT ORDERS IN**

4   **HIGHER VOLUMES?**

5 A.   In determining the extent to which MCI will be able to transmit full commercial volumes

6   of orders, MCI will evaluate the degree to which it continues to have operational

7   problems due to BellSouth's OSS and other deficiencies, as well as the likelihood of

8   future problems with increased volumes. In particular, MCI will evaluate the extent to

9   which BellSouth continues to rely on extensive manual processing on its side of the

10   interfaces. MCI believes that all of these problems can be corrected and hopes they are

11   corrected so that it can ramp up to full commercial volumes. Whether MCI is able to do

12   so, however, depends on the extent to which BellSouth makes further progress. From our

13   experience thus far it is clear that BellSouth's OSS is not yet operationally ready to

14   accept commercial volumes of UNE-P orders.

15 Q. **PLEASE SUMMARIZE SOME OF THE MORE SIGNIFICANT PROBLEMS**

16   **THAT MCI HAS EXPERIENCED DURING ITS LAUNCH.**

17 A.   Defects in BellSouth's systems that have surfaced thus far include the following: (1) in

18   at least 188 cases, customers' loss of dial tone during migration or the loss of the ability

19   to receive calls; (2) excessive manual handling that continues to cause incorrectly

20   rejected orders; (3) missing firm order confirmations and completion notices; (4) high

21   rejection rates; (5) changed due dates; (6) long TAG pre-ordering response times; and (7)

22   billing system problems that lead to double billing, delay in OS/DA branding and

1   maintenance and repair problems. Unfortunately, our experience with other Bell

2   Operating Companies has been that new problems have arisen as order volumes increase

3   and manual processes prove insufficient to the task of processing thousands of orders per

4   week. That so many significant problems have manifested themselves at low order

5   volumes is therefore troubling.

6 Q. **PLEASE DESCRIBE THE PROBLEM MCI HAS EXPERIENCED WITH LOSS**

7   **OF DIAL TONE.**

8 A. The biggest problem we are facing right now is customers who are losing dial tone.

9   Through July 2, 2001, we have had 188 customers lose dial tone (or in some cases, the

10   inability to receive calls) shortly after being migrated to us. Our customers have been

11   losing dial tone for up to 48 hours -- some of them even longer -- a major customer

12   impact. In each case, the customer who lost dial tone had working phone service before

13   being migrated to MCI. So far the explanations we have received for these

14   disconnections suggest that the cause of the problems concern faulty facilities, problems

15   with customers' telephones and the like. There should be no physical work that goes into

16   migrating a BellSouth customer to an MCI UNE-P line, so it makes no sense that so

17   many customers would be losing dial tone after being migrated to us just as a matter of

18   random chance. There appears to be a very serious problem with BellSouth's ordering

19   and provisioning process that needs to be fixed because such large numbers of customers

20   are being affected. If this problem is not fixed immediately, it will seriously harm our

21   ability to compete in the local residential market.

1 Q. HAS THE BELLSOUTH ACCOUNT TEAM SUGGESTED ANY OTHER

2   POSSIBLE CAUSE OF THIS PROBLEM?

3 A. Yes. The account team has stated that the problem could be the result of a conflict

4   between the disconnect ("D") and the new ("N") service orders generated by the

5   BellSouth backend systems. The account teams stated that such errors are identified with

6   a cause code of 510 on trouble ticket responses. We checked the trouble ticket responses,

7   however, and they do not include the cause and disposition codes used by BellSouth.

8   When MCI's technical support staff requested the cause code for the trouble tickets

9   submitted for the loss of dial tone problem, BellSouth's CWINS center stated that it

10   would not provide this information. The ILECs for the other local residential markets

11   MCI has entered provide this information upon request and MCI is at a loss to understand

12   why BellSouth will not provide it. Although these codes have been provided after

13   BellSouth account team research on specific PONs, we need this information on each

14   trouble ticket at the time it is closed.

15 Q. WHAT DOES BELLSOUTH NEED TO DO TO ADDRESS THIS PROBLEM?

16 A. Most importantly, BellSouth must reduce its level of manual handling to ensure that the

17   RRSO code and sequence information are added to every order so that the loss of dial

18   tone will at least be reduced. In recent hearings, BellSouth has stated that a single order

19   process is under development. This process must be in place before BellSouth can

20   provide parity service.

21 Q. PLEASE DESCRIBE THE PROBLEM MCI HAS EXPERIENCED WITH

22   MANUAL PROCESSING OF ORDERS.

1 A. BellSouth continues to handle far too many orders manually, introducing errors and

2   slowing the migration process. From our experience in the five other states we have

3   entered, we understand that the two acceptable reasons for manual handling are (i) two

4   orders against the same telephone number existing in the system at the same time (for

5   example, a pending order on the ILEC to add a feature followed immediately by an order

6   to migrate the customer), and (ii) a conflict in features ordered (for example, an order for

7   call waiting and caller ID with call waiting at the same time). These orders must fall to

8   manual so that the ILEC service representative can determine the proper actions to take.

9   BellSouth, however, appears to process additional order types manually. For example,

10   BellSouth has begun to clarify orders with the note "CLR TEL NO LCON

11   FORMATTED INCORRECTLY," yet MCI has sent the name and telephone number that

12   appears on the customer service record ("CSR"), which suggests that BellSouth has

13   processed the LSR manually for some reason. Through June 29, there had been 104

14   rejects for this reason. The following orders have been routed to the account team for

15   research:

16   S003356868BSGAPR
17   S003357316BSGAPR
18   S003358130BSGAPR
19   S003352928BSGAPR
20   S003353248BSGAPR
21   S003352883BSGAPR
22   S003352889BSGAPR
23   S003352897BSGAPR
24
25   MCI also has received clarifications for "assignable order" and for "required

26   USOC missing." These clarifications do not provide the information necessary to correct

27   the order and appear to be mistaken explanations resulting from manual processing. To

1   make matters worse, unless a CLEC responds to a manual clarification within ten days,

2   BellSouth will cancel the order and charge the CLEC for doing so. Clarifications that

3   provide vague or incorrect explanations of the reason for rejection can make this deadline

4   difficult to comply with and make it difficult for MCI to migrate customers on their

5   required due date. Other ILECs give a thirty day deadline and allow for extensions,

6   which makes this problem more manageable.

7 Q. **CAN YOU GIVE AN EXAMPLE OF A MANUAL PROCESSING PROBLEM**

8   **MCI HAS EXPERIENCED DURING ITS GEORGIA LAUNCH?**

9 A. Yes. Of the some 3400 orders sent during MCI's Georgia launch through May 25,

10   approximately 365 were rejected in error by BellSouth's service representatives. These

11   orders fell out of the BellSouth automated processing stream for reasons that are still

12   unclear, but appear to include unannounced, sporadic shutdowns of the BellSouth back

13   end systems. Once the orders fell out of the automated process, the BellSouth

14   representatives rejected them for one of two (incorrect) reasons. First, about 50 orders

15   fell out because BellSouth's representatives failed to recognize that they represented a

16   proper UNE-P transaction type. Second, about 250 orders were incorrectly rejected

17   because the product (or "USOC") code "UEPLX" was not on the order. This code is

18   added automatically by BellSouth's systems when an order "flows through" them, but

19   must be added by a BellSouth account representative if the order falls to manual.

20   Unfortunately, rather than adding this code, BellSouth's representatives simply rejected

21   the orders back to MCI in error, requiring costly research and re-work. About 65

22   additional orders fell out for both of the reasons noted above.

1   MCI's BellSouth account team has acknowledged that these orders should not

2   have fallen out for manual processing and that they should not have been rejected. The

3   rejections took place because BellSouth representatives at the Local Carrier Service

4   Center had not been trained to process them correctly. Although BellSouth agreed to

5   reprocess these specific orders and has begun working an initial list of 298 rejected orders

6   provided by MCI, no root cause analysis for the fallout has been provided. The initial

7   problem of incorrect manual rejects appears to have stopped as of May 23, but MCI is

8   continuing to monitor the situation.

9 Q. **HAS MCI CONTINUED TO SEE PROBLEMS ASSOCIATED WITH MANUAL**

10   **PROCESSING?**

11 A. Yes. Many LSRs continue to fall out for manual processing, and we are continuing to see

12   these orders being rejected for reasons we know to be incorrect and that appear to us to

13   be incorrect. Through June 29, MCI identified 572 invalid "clarifications." MCI remains

14   concerned that such a high level of manual processing apparently is being used and that

15   such manual processing will lead to more problems as order volumes increase.

16 Q. **PLEASE DESCRIBE THE PROBLEM MCI HAS EXPERIENCED WITH**

17   **MISSING NOTIFIERS.**

18 A. MCI has begun to experience a problem with missing firm order confirmations and

19   completion notifications. While this problem is still a small one at the early stages of our

20   launch, our experience in other states is that even a small missing notifier problem at this

21   stage is often an indication of system problems that will escalate as volumes climb. MCI

22   has opened trouble tickets with BellSouth for this problem and has requested the EDI

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1   tracking numbers (ISA/GS numbers) so that we may do internal research on this problem.

2   BellSouth has not yet agreed to provide us with these tracking numbers, making it

3   impossible to do research on our side.

4 Q. **PLEASE DESCRIBE THE PROBLEM MCI HAS EXPERIENCED WITH HIGH**

5   **REJECT RATES.**

6 A. Of the LSRs we submitted in June, we have had a reject rate of about 25%. About

7   twenty-two percent of those rejects are address rejects that occur because of BellSouth's

8   requirement that we provide a complete service address for every customer, even though

9   the customers are simply changing the ownership of their account from BellSouth to MCI

10   so that no installation is required. The other Bell companies deal with his problem by

11   only requiring customer name and telephone number for a migration order. We have

12   requested in the change management process that BellSouth do the same, but

13   implementation has been postponed indefinitely.

14 Q. **PLEASE DESCRIBE THE PROBLEM MCI HAS EXPERIENCED WITH**

15   **CHANGED DUE DATES.**

16 A. BellSouth appears to be changing MCI's requested due date on a number of MCI's

17   migration orders. For example, on June 8, MCI sent PON S003178025BSGAPR1 to

18   BellSouth requesting a due date of June 12. This due date was well within the BellSouth

19   specified interval for a migration as specified residential, non-dispatch order. MCI

20   received a FOC with a due date of June 15. MCI provided a list of fifteen examples to

21   BellSouth for research the reason for this change of due date. Changed due dates such as

22   this postpone completion of the customer's order and result in customer dissatisfaction.

1   Q.   **PLEASE DESCRIBE THE PROBLEM MCI HAS SEEN WITH TAG RESPONSE**

2   **TIMES.**

3   A.   MCI has begun to see a problem with slow or downgraded responses from BellSouth's

4   TAG pre-ordering system. MCI has created an application-to-application interface with

5   TAG that allows MCI to perform a service address validation and obtain the customer's

6   service record. These two transactions are necessary because BellSouth requires a

7   complete service address for a customer to migrate from BellSouth to MCI, even though

8   nothing about the customer's address or service location is changing. MCI has

9   experienced slowdowns and outages of TAG on numerous occasions. MCI opened

10   trouble tickets for this issue on June 4, 5, 14, 28 and 29. All tickets have been closed, but

11   the underlying problem apparently has not been fixed. BellSouth has told MCI

12   information technology personnel that TAG was not capable of handling the transaction

13   load that it was receiving. This problem, too, is under discussion. When we cannot

14   access these two transactions, we risk sending an incomplete or invalid service address

15   and having the order rejected. Address rejects in BellSouth are climbing.

                When this problem was brought to BellSouth's attention, BellSouth told us that

16

17   we are requesting too many CSRs and validating too many addresses, and that the system

18   was not built for the stress our commercial entry is placing on it. Again, we are just

19   getting started and expect to increase volumes substantially over the coming months. We

20   are concerned that our current low order volumes appear to be presenting a problem to

21   BellSouth.

22   Q.   **PLEASE DESCRIBE THE BILLING PROBLEMS MCI IS BEGINNING TO SEE.**

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1 A. BellSouth does not appear to be updating its billing system properly and rapidly. Orders

2   are falling into a hold file, which prevents customers from receiving MCI branding on

3   their OS/DA calls and causes double billing and potential service disruption. According

4   to the BellSouth account team, it can take up to thirty days for a hold file error to be

5   corrected. An examination of seven random orders that have been provisioned showed

6   that in three cases CSOTS reflected that MCI owned the customer's account while the

7   post migration CSR showed that BellSouth continued to own the account, which means

8   the CSR had not yet been updated. More investigation will be required, but this spot

9   check suggests that a significant number of orders will fall to a hold file, subjecting

10   customers to billing by both BellSouth and MCI.

11 Q. **WHAT CONCLUSION DO YOU DRAW FROM MCI'S EARLY EXPERIENCE**

12   **WITH ITS GEORGIA LAUNCH?**

13 A. It does not appear that BellSouth's OSS in Georgia is capable yet of supporting

14   commercial volumes of orders. The high number of customer losing dial tone shortly

15   after migration and the apparently high level of manual processing are particularly

16   troubling, and must be addressed before high volume ordering can be sustained. MCI

17   intends to work with BellSouth to correct these problems and any new ones that emerge

18   as our launch progresses. In the meantime, however, BellSouth cannot be said to be

19   providing nondiscriminatory access to its OSS.

20 Q. **WHAT DOES MCI'S GEORGIA LAUNCH EXPERIENCE SAY ABOUT THE**

21   **IMPORTANCE OF CHANGE MANAGEMENT?**

1   A.   A number of functional improvements and defect corrections will need to be made to

2   BellSouth's OSS. BellSouth's ability to make those changes quickly and effectively will

3   be key to its ability to support our Georgia launch and the local entry of other CLECs.

4   Q.   **WHAT HAS THE FCC SAID ABOUT THE IMPORTANCE OF CHANGE**

5   **MANAGEMENT?**

6   A.   The FCC has consistently emphasized the importance of change management. In its

7   Order approving Bell Atlantic's New York Section 271 application, it explained that as

8   part of a Bell company's demonstration that it provides efficient competitors a

9   meaningful opportunity to compete, "the Commission will give substantial consideration

10   to the existence of an adequate change management process and evidence that the BOC

11   has adhered to this process over time." *In re: Application by Bell Atlantic New York for*

12   *Authorization Under Section 271 of the Communication Act to Provide In-Region,*

13   *InterLATA Service in New York*, CC Docket No. 99-295, Memorandum Opinion and

14   Order ¶ 102 (rel. Dec. 22, 1999) ("New York 271 Order"); *see also In re: Application by*

15   *SBC Communications Inc. et. al Pursuant to Section 271 of the Telecommunications Act*

16   *of 1996 To Provide In-Region, InterLATA Services In Texas*, CC Docket No. 00-65,

17   Memorandum Opinion and Order, ¶ 106 (rel. June 30, 2000) ("Texas 271 Order"). As the

18   FCC explained, "[w]ithout a change management process in place, a BOC can impose

19   substantial costs on competing carriers simply by making changes to its systems and

20   interfaces without providing adequate testing opportunities and accurate and timely

21   notice and documentation of changes." New York 271 Order ¶ 204.

1 Q. IS BELLSOUTH'S CHANGE MANAGEMENT ADEQUATE TO ENABLE

2   CLECS A MEANINGFUL OPPORTUNITY TO COMPETE?

3 A. BellSouth's change management rules and its *implementation* of those rules must

4   improve in a number of important ways before CLECs in the BellSouth region will have

5   an adequate opportunity to compete.

6 Q. IN WHAT WAYS DO YOU FEEL BELLSOUTH'S CHANGE MANAGEMENT IS

7   INADEQUATE TO ALLOW CLECS A MEANINGFUL OPPORTUNITY TO

8   COMPETE?

9 A. To begin with, although BellSouth's change control plan in theory allows CLECs to

10   prioritize change requests, in practice BellSouth often delays implementation of CLEC-

11   initiated requests. Thus, vital CLEC requests, such as provision of parsed CSRs often

12   take years to implement. In approving Bell Atlantic's New York section 271 application,

13   the FCC emphasized that Bell Atlantic's process "prioritize[d] changes based on merit,

14   rather than the sponsor of the change," *id.* ¶ 106, and noted "we would be concerned

15   about the impact of a BOC disregarding input from competing carriers on change

16   management issues." *Id.* ¶ 124.

17 Q. WHAT DOES BELLSOUTH'S CHANGE MANAGEMENT PLAN SAY ABOUT

18   CLEC-INITIATED AS COMPARED WITH BELLSOUTH-INITIATED

19   CHANGES?

20 A. BellSouth's change management plan includes processes for both BellSouth and CLECs

21   to propose changes. BellSouth-initiated changes are called Type 4 changes; CLEC-

22   initiated changes are called Type 5 changes. Under the Change Management Plan, Type

1		4 and Type 5 changes are supposed to be treated identically. First, a change request must
2		be reviewed for acceptance by BellSouth within 20 days (obviously, for BellSouth
3		requests, such acceptance is a given). Before BellSouth accepts the change request, the
4		request is called a new request. After BellSouth has accepted the request, the request is
5		considered a pending request. The next step is that BellSouth has 5-7 days to prepare for
6		a change review meeting, and it must then conduct such a meeting. At the meeting,
7		CLECs prioritize change requests, including both Type 4 and Type 5 Change Requests,
8		with one vote per CLEC. (BellSouth Change Control Process, Version 2.3, May 18,
9		2001 at 48). BellSouth then schedules those requests based on the priority order in
10		upcoming releases and implements them.
11	Q.	IS BELLSOUTH REQUIRED TO SCHEDULE CLEC-INITIATED CHANGE
12		REQUESTS?
13		There is nothing in the change management plan that requires BellSouth to schedule
14		CLEC change requests. BellSouth can refuse to accept CLEC change requests, can
15		accept them and not schedule them, or can schedule them and then change the schedule.
16		This is so even if the CLEC's request is entirely reasonable and is prioritized by the
17		CLECs. BellSouth has abused this authority in order to deviate from the change
18		management schedule or simply to delay implementation of CLEC-initiated change
19		requests because nothing in the plan precludes it from doing so.
20	Q.	IS THERE EVIDENCE THAT BELLSOUTH DELAYS IMPLEMENTATION OF
21		CLEC-INITIATED CHANGES?

1   A.   Yes. Analysis of CLEC-initiated change requests shows that BellSouth delays

2   implementation of these requests at each stage of the process.

3   Q.   **COULD YOU DESCRIBE THE EVIDENCE REGARDING TREATMENT OF**

4   **CLEC-INITIATED CHANGE REQUESTS AT THE BEGINNING OF THE**

5   **CHANGE CONTROL PROCESS?**

6   A.   As of June 29, 2001, there were 27 "new" Type V requests. Of these, 24 have been in

7   new status for more than the 20 days the change management plan allots for BellSouth to

8   accept a request. Most have been in new status for many months. One of the "new"

9   change requests was submitted more than 15 months ago, one was submitted more than

10   14 months ago, one was submitted more than 10 months ago, one was submitted more

11   than 9 months ago, one was submitted more than 7 months ago, one was submitted more

12   than 6 months ago, two were submitted more than 5 months ago, two were submitted

13   more than 4 months ago, two were submitted more than 3 months ago, four were

14   submitted more than 2 months ago, and five were submitted more than 1 month ago.

15   Thus, BellSouth has caused delays even in the earliest stage of the change control

16   process.

17   Q.   **WHY DO SUCH DELAYS OCCUR AT THE BEGINNING OF THE PROCESS?**

18   A.   Such delays often occur because BellSouth neither accepts nor rejects a CLEC request.

19   For example, MCI recently requested that BellSouth extend the length of time for which

20   LENS and TAFI passwords remain valid from 60 days to 1 year (CR0421). BellSouth

21   responded that this was not its policy. But BellSouth did not officially reject MCI's

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1   change request. Thus, the request remains in limbo rather than being open for discussion

2   with other CLECs.

3 Q. **ARE THERE DELAYS AFTER BELLSOUTH ACCEPTS A CHANGE**

4   **REQUEST?**

5 A. Yes. Once BellSouth accepts a request, it often takes a long time before that request is

6   placed on the ballot for CLECs to prioritize. As of June 29, 2001 there were 17

7   "pending" change requests on the status log on BellSouth's web site. Of these, 11 were

8   CLEC-initiated change requests. Six of the 17 pending change requests had been

9   pending since 2000. All were CLEC initiated (Type 5) change requests (CR133, 151,

10   177, 184, 246, 371). Even though BellSouth has had two change control meetings since

11   the beginning of 2001 to prioritize requests, none of these six change requests was on the

12   list to be prioritized.

13 Q. **ARE THERE DELAYS AFTER A CLEC-INITIATED REQUEST IS**

14   **PRIORITIZED?**

15 A. Yes. Once a CLEC request is prioritized, it still must be scheduled for implementation.

16   This also frequently takes many months. During its Georgia test, KPMG noted the

17   "backlog of [CLEC] change requests that, at the time of this report, were prioritized but

18   unscheduled for implementation into a release." (Georgia KPMG Report at CM-1-1-3.)

19   BellSouth currently has scheduled only five Type 5 change requests for implementation

20   in upcoming releases. In contrast, as of June 29, 2001, BellSouth's status log shows that

21   24 Type 5 change requests (and 17 Type 4 change requests) were in the status "candidate

22   request," which means that they have been prioritized by the CLECs at a change control

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1   meeting but have not yet been scheduled for implementation. Three of these were

2   submitted in 1999 -- CR 366 (handling of remaining service on partial migrations), 367

3   (LEAN/LEATN fields) and 368 (provide CFA on pre-order). All were Type 5 requests.

4 Q. **HAVE ANY CHANGE REQUESTS THAT CLECS PLACED NEAR THE TOP OF**

5   **THEIR PRIORITY LIST BEEN DELAYED AFTER PRIORITIZATION?**

6 A.   Yes. Some of the "candidate requests" that have not yet been scheduled for

7   implementation were ranked very high by CLECs. CR135, for example, which was

8   submitted by AT&T on August 9, 2000, was prioritized fourth by the CLEC community

9   on the pre-ordering/ordering priority list at the January 31, 2001 meeting.[1] It was re-

10   prioritized at the April 25, 2001 meeting because BellSouth failed to schedule it for

11   implementation prior to that meeting, and it was again prioritized fourth. (CR135 is

12   designed to enable a CLEC to electronically order a migration of a customer's line to the

13   CLEC and have that line added to an existing account the customer has with the CLEC).

14   CR0040 was requested by AT&T on May 11, *2000* but was not even placed by BellSouth

15   on the list of change requests to be prioritized until the April 25, 2001 meeting. At that

16   meeting, it was prioritized *first*, yet it still has not been scheduled. (CR0040 is designed

17   to enable CLECs to obtain real-time status information electronically). CR0020, a

18   TriVergient Communications request to enable CLECs to view multiple CSRs

19   simultaneously, was submitted on May 2, 2000, was prioritized fourth among pre-

20   ordering requests at the *June 28, 2000* meeting, but was not scheduled to be

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[1]   Change requests by one CLEC often benefit other CLECs. The prioritization process is designed to ensure that changes that benefit CLECs the most as a group are implemented first.

1 implemented, and indeed has still not been scheduled, despite being re-prioritized seventh

2 at the April 25, 2001 meeting.

3   A final example of BellSouth's delay in scheduling implementation of candidate

4 requests is MCI's change request 0186. On September 26, 2000, MCI submitted this

5 change request for use of the Interactive Agent protocol which would allow orders to be

6 transmitted in real time, rather than being transmitted through a value added network that

7 creates delay. MCI is already using Interactive Agent with other LECs. BellSouth

8 initially responded that it would implement Interactive Agent with the scheduled release

9 of CR0101 which had already been prioritized. In December 2000, BellSouth stated that

10 CR0186 could not be worked with CR0101, but then reversed itself again on February

11 14, 2001, stating that the requests would be worked together. MCI escalated the issue on

12 April 4, 2001. The change request was finally subject to prioritization at the April 25,

13 2001 meeting. It still has not yet been implemented.

14 **Q.** **IS THERE ANY OTHER EVIDENCE OF DELAYS BETWEEN SUBMISSION OF**

15   **A CHANGE REQUEST AND SCHEDULING OF THAT REQUEST?**

16 **A.** Yes. Of the five Type 5 change requests that BellSouth presently has scheduled to be

17 implemented in upcoming releases, three of these are longstanding requests: CR53 (BBR-

18 LO Improvements, requested 5/22/2000), CR364 (ability to use form for directory listing

19 that drops from 411/directory assistance, requested 8/12/1999), and CR369

20 (formerlyTAG0812990003) (parsed CSRs, requested 8/12/1999).

21 **Q.** **HAVE YOU PERFORMED ANY ANALYSIS OF THE CHANGE REQUESTS**

22   **THAT HAVE ACTUALLY BEEN IMPLEMENTED?**

1   Yes. I found that even when BellSouth implements CLEC-initiated change requests and

2   does so without extensive delay, it takes nearly twice as long to do so on average as it

3   does with BellSouth-initiated change requests. Well under half of the change requests

4   submitted between 1999 and 2001 have been implemented. Of these, BellSouth took

5   nearly twice as long to implement CLEC-initiated requests as it did BellSouth-initiated

6   requests. For those Type IV and Type V change requests that were actually implemented

7   in 1999 and 2000, BellSouth took an average of 2.35 months to implement BellSouth-

8   initiated change requests[1] and 4.28 months to implement CLEC-initiated change

9   requests. (These averages were obtained by printing out the change control log archive,

10   which does not include changes implemented in 2001, on BellSouth's web site and

11   averaging the months for Type IV and Type V changes.)

12 **Q.** **WHAT, IF ANY, IMPACT DOES DELAY IN IMPLEMENTATION OF CLEC-**

13   **INITIATED CHANGE REQUESTS HAVE ON CLECS?**

14 **A.** BellSouth's delay in implementing important CLEC-initiated changes often has

15   significant negative impacts on CLECs. This is evident from examining three change

16   requests related to integration of pre-ordering and ordering. It is fundamental to effective

17   OSS that CLECs are able to take information received at the pre-ordering stage and use it

18   to populate an order without having to re-type that information. Re-typing the

19   information significantly increases delay and leads to errors. Moreover, only integrated

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[2]   For example, CR 0216, NPORD Data for FOC (Issue 7 – LNP for Ordering impact) was submitted by BellSouth on November 13, 2000 and implemented on December 10, 2000. CR 0219, standard interval changes for loop (LNP for ordering impact) was submitted by BellSouth on November 13, 20000 and implemented on December 10, 20000, and CR 0247, reduce due date interval from 5 to 4 days for SL1 in TAG (system and documentation impact for LENS and TAG within the preorder and order interfaces) was submitted on December 15, 2000 and implemented on January 27, 2001.

1   interfaces can allow national CLECs such as MCI to create a standard set of pre-ordering

2   screens to present to their customer service representatives. In fact, the FCC rejected all

3   three of BellSouth's Section 271 applications in part because BellSouth did not provide

4   CLECs access to a pre-order interface that could be effectively integrated with the

5   CLECs' ordering interfaces. *In re: BellSouth Corporation Pursuant to Section 271 of*

6   *the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services*

7   *in South Carolina*, CC Docket No. 97-208, ¶¶ 155-66 (rel. Dec. 24, 1997); *In re:*

8   *Application by BellSouth Corp., et al. for Provision of In-Region, InterLATA Services in*

9   *Louisiana*, CC Docket No. 97-231, ¶¶ 49-55 (rel. Feb. 4, 1998); *In re: Second*

10   *Application by BellSouth Corp., BellSouth Telecommunications, Inc., and BellSouth Long*

11   *Distance, Inc. for Provision of In-Region, InterLATA Services in Louisiana*, CC Docket

12   No. 98-121, ¶¶ 96-103 (rel. Oct. 13, 1998).

13   Q.   **WHAT CHANGE REQUESTS HAVE CLECS SUBMITTED RELATED TO**

14   **INTEGRATION OF PRE-ORDERING AND ORDERING?**

15   A.   CLECs have submitted three change requests related to integration and all have met with

16   extensive delays. On August 12, 1999, AT&T submitted change request 0369 requesting

17   fielded, parsed CSRs. Parsed CSRs return pre-order information in individual fields that

18   can be directly populated on the corresponding ordering fields, rather than concatenated

19   information that must be broken up into parts to enter into ordering fields. Parsed CSRs

20   are by far the most effective means of achieving pre-order/order integration. In

21   approving Bell Atlantic's New York Section 271 application, the FCC stated that, "the

22   BOC must enable competing carriers to transfer pre-ordering information electronically

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1   to the BOC's ordering interface or to the carriers' own back office systems, which may

2   require 'parsing' pre-ordering information into identifiable fields." New York 271 Order

3   ¶ 137. And in the Texas 271 Order, the FCC concluded that although parsed CSRs were

4   not the only way that a BOC could enable CLECs to integrate pre-ordering and ordering,

5   a BOC could most readily show its interfaces were integratable by offering parsed CSRs.

6   Texas 271 Order ¶ 153.3

7   Nonetheless, BellSouth has repeatedly delayed implementation of parsed CSRs.

8   In response to CR0369, BellSouth initially stated that it would develop a project plan for

9   implementing parsed CSRs during the Y2K window at the end of 1999 and beginning of

10   2000. But it was not until September 2000 that BellSouth even began addressing the

11   change request with the CLECs. It was only at the September 27, 2000 meeting that

12   parsed CSRs were submitted to change control for prioritization (at the time, the request

13   had a different number, TAG0812990003). CLECs prioritized parsed CSRs *first* among

14   pre-ordering requests at the September 27, 2000 meeting. But BellSouth still did not

15   schedule implementation of parsed CSRs. Eventually BellSouth provided an

16   implementation date of December 2001, which has now slipped again to sometime in

17   2002, close to two-and-a-half years after the request was first made.

18   In contrast, in concluding that Bell Atlantic's change management process in New

19   York was adequate, the FCC specifically noted that "when MCI WorldCom expressed a

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3 Although the FCC approved SWBT's application in Texas without requiring a parsed CSR, in the BellSouth region, where CLECs long ago requested and prioritized such parsed CSRs in the change management process, BellSouth should be providing fully parsed CSRs. Moreover, SWBT, unlike BellSouth, had agreed to promptly effectuate integration through adoption of a process allowing CLECs to migrate UNE-P orders without including a service address on the orders. As discussed below, BellSouth has not implemented a similar process despite MCI's request in the change management process.

1   preference regarding how customer service record addresses be made available to

2   competing carriers, Bell Atlantic agreed to add this functionality within the remaining

3   *weeks* before the related change release. At the same time, Bell Atlantic devised a

4   special software approach to defer implementation of this functionality for AT&T, the

5   sole competing carrier that objected to this change." New York 271 Order ¶ 124

6   (emphasis added). BellSouth has not been remotely as responsive to the request for

7   parsed CSRs in its region.

8   Q.   HAVE CLECS SUBMITTED ANY OTHER CHANGE REQUESTS RELATED

9   TO INTEGRATION OF PRE-ORDERING AND ORDERING?

10   A.   Yes. On August 9, 2000, MCI submitted a second change request (0133) that would have

11   significantly contributed to integration of pre-order and order interfaces. MCI requested

12   that BellSouth enable CLECs to submit migration orders with the customer's name and

13   telephone number but without a service address. Because one of the most difficult

14   aspects of integration is taking service address information from the pre-order stage and

15   using it to populate an order, this change request would have substantially reduced rejects

16   based on inaccurate address information. Indeed, both Verizon and SWBT enable

17   carriers to place orders without a service address in order to enable better integration of

18   pre-ordering and ordering, and, in approving SWBT's section 271 application in Texas,

19   the FCC noted that this enhancement "provides assurances that carriers that have yet to

20   attempt integration should be able to avoid the burden of receiving and processing a large

21   number of address-related rejects." Texas 271 Order ¶ 160.

1   When MCI submitted CR0133, it indicated that the request had a high priority.

2   Nonetheless, BellSouth originally resisted the change, suggesting that a similar change

3   was being considered by industry bodies. It later accepted the change request and

4   seemed to combine its consideration with a similar AT&T request, EDI1121599001,

5   which had been pending since *December 1999*. That request was prioritized sixth by the

6   CLECs on the ordering list at the September 27, 2000 meeting.

7   Neither AT&T's nor MCI's request was scheduled for implementation, however,

8   nor were they placed on the list to be reprioritized at the January 31, 2001 meeting. On

9   March 15, 2001, BellSouth announced that the request would be re-prioritized at the

10   March 28, 2001 meeting. But BellSouth then unilaterally withdrew the request from

11   consideration for re-prioritization, claiming that the change was inconsistent with new

12   requirements to place address fields on certain orders. For some reason, BellSouth

13   subsequently informed MCI (in May 2001) that the migration by telephone number was

14   in testing and would be targeted for a future release. Thus, the status of this change

15   request remains unclear.4

16 **Q.   HAS THERE BEEN A THIRD CHANGE REQUEST RELATED TO**

17 **INTEGRATION?**

18 A.   Yes. AT&T long ago submitted a third change request that is important for integration of

19   pre-ordering and ordering and that has only recently been scheduled. On March 1, 2000,

20   AT&T submitted CR2 to correct business rule discrepancies between pre-ordering and

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4 While MCI has been able to design its interface to obtain service addresses through the service address verification
process and place those on its orders, this process often leads to rejects based on service address errors and also is

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1   ordering. The length of some pre-order fields exceeded that of corresponding order fields

2   so that if pre-order information was submitted on an order the information would be

3   truncated. The FCC has emphasized that when a BOC "becomes aware of any

4   inconsistencies in field names or formats that would impede a carrier's ability to integrate

5   pre-ordering and ordering functions, we expect that [the BOC] promptly will design and

6   deploy a software correction or provide the necessary technical assistance to competing

7   carriers in the interface integration." New York 271 Order ¶ 139. Nevertheless, after

8   AT&T submitted CR2, BellSouth failed to submit that request to CLECs for

9   prioritization. Instead, more than a year after AT&T submitted the request, BellSouth

10 finally responded by scheduling the change for implementation in the July 28, 2001

11 release.

12   BellSouth's delay in implementing change requests that are needed to ensure

13 integratable interfaces underscores its more general failure to respond effectively to

14 CLEC-initiated change requests. BellSouth must begin responding more effectively to

15 CLEC requests before obtaining Section 271 authorization.

16 **Q.   ASIDE FROM DELAYED IMPLEMENTATION OF CLEC-INITIATED**

17   **CHANGES, ARE THERE ANY OTHER PROBLEMS WITH BELLSOUTH'S**

18   **CHANGE CONTROL PROCESS?**

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completely ineffective during the many times that TAG is down. BellSouth should have much more rapidly
implemented the CLEC-requested changes that would have led to more effective integration.

1   A.   Yes. There are a number of other problems. One important problem is that BellSouth

2   fails to implement Type 6 changes quickly enough. A Type 6 change "is any non-type 1

3   change that corrects problems discovered in production versions of an application

4   interface" either because the interface is not working in accordance with published

5   requirements or because agreed-upon requirements result in inoperable functionality.

6   (May 18, 2001 Change Control Process document (Version 2.3) at 37.) BellSouth

7   separates Type 6 changes into High Impact (impairs critical functions and no electronic

8   workaround exists); medium impact (impairs critical system functions, though a

9   workaround solution does exist), and low impact (causes inconvenience or annoyance).

10   The change control process calls for BellSouth to internally determine solutions for high

11   impact defects in 4-25 days with best effort used to achieve the earlier number, medium

12   impact defects in 90 days with best effort used to achieve the earlier number and low

13   impact defects using best effort. (Additional time is required for other steps in the

14   resolution process.) BellSouth has rejected the CLECs' balloted proposal in which it

15   would be required to complete the internal resolution process for high and medium

16   impact defects in 4-10 business days with best effort used to achieve the earlier number,

17   and low impact defects within a 4-20 business day range with best effort used to achieve

18   the earlier number. (BellSouth Change Control Process Working Document, May 18,

19   2001, Version 2.3 at 47-48.)

20   Q.   **WHY SHOULD BELLSOUTH ACCEDE TO THE CLECS' PROPOSAL?**

21   A.   A medium impact defect affects critical functionality, but a manual workaround exists.

22   Given MCI's expected order volume (based on its order volume in other states), MCI

1		cannot fall into a manual mode for more than 90 days. This will be extremely costly to
2		MCI and will also result in extensive delays. "Low" impact defects which cause
3		inconvenience should also be resolved rapidly, not left to a "best efforts" standard.
4	Q.	**IS THE TYPE 6 ISSUE BEING RESOLVED ELSEWHERE?**
5	A.	Yes. BellSouth's failure to commit to more rapid implementation of Type 6 changes was
6		the subject of an arbitration between AT&T and BellSouth in Florida in Docket No.
7		000731-TP. In its Order No. PSC-01-1402-FOF-TP issued on June 28, 2001, the Florida
8		Public Service Commission ruled that BellSouth's timeframe for high impact defects
9		should be shortened to 4-10 business days. Further, the time for developing a temporary
10		solution for medium impact defects was shortened to two days.
11	Q.	**DOES BELLSOUTH PROVIDE CLECS' AN ADEQUATE RELEASE**
12		**SCHEDULE SHOWING WHEN IT WILL IMPLEMENT CHANGES?**
13	A.	No. BellSouth, unlike other BOCs such as Verizon, has not had any fixed release
14		schedule based on which new interface versions will be released on specific days of the
15		month or specific months of the year, so that CLECs can plan well in advance when to
16		expect a release. BellSouth has now agreed to provide such a schedule, which is a
17		significant improvement. However, BellSouth has not agreed to include in that schedule
18		the expected content of future releases. The schedule will provide the days on which
19		releases will occur but not what functionality will be included in those releases. Thus,
20		CLECs still cannot plan in advance as to when specific changes can be expected.
21		Moreover, CLECs have no means to assess whether BellSouth is appropriately
22		implementing CLEC change requests until the releases are almost upon them.

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1   **Q.**   **DO OTHER BOCS PROVIDE A RELEASE SCHEDULE THAT INCLUDES THE**

2   **CONTENT OF RELEASES?**

3   Yes. Verizon and SWBT long have had schedules on which releases occur on particular

4   days and provide well in advance a list of the planned functionality that will be

5   incorporated in each release. The FCC thus noted approvingly that SWBT provides

6   "competing carriers with a '12-Month Development Plan,' which reflects SWBT's plans

7   for future OSS modifications." Texas 271 Order ¶ 111. BellSouth should do the same.

8   **Q.**   **DOES BELLSOUTH'S CHANGE MANAGEMENT PLAN ENSURE CLECS**

9   **THAT THEY WILL RECEIVE DOCUMENTATION SUFFICIENTLY IN**

10   **ADVANCE OF DEPLOYMENT OF AN INTERFACE?**

11   **A.**   BellSouth has not yet definitively agreed to provide CLECs with documentation

12   sufficiently in advance to allow them time to code to that documentation and test their

13   new interfaces prior to a release date. Indeed, BellSouth's Change Control Process

14   Version 2.3 provides that business rules must be released only "30 days or more in

15   advance of implementation date." (May 18, 2001 at 26.. Thus, BellSouth's release 9.4,

16   which BellSouth characterizes as a major release, is scheduled to be implemented on July

17   28, 2001, yet BellSouth is not scheduled to release final business rules until June 28, and

18   final user requirements until June 8. This is clearly insufficient time for CLECs to code

19   their interfaces. In fact, KPMG noted in its Georgia Report that "the stated 30-day

20   notification interval applicable specifically to software releases may be insufficient for

21   CLEC coding and associated release preparation." (Georgia KPMG Report at CM-1-1-

22   5.) The 30-day interval also provides CLECs insufficient time to comment on business

1   rules and ferret out errors. This may explain why KPMG has opened numerous

2   exceptions in Florida (for example, Exceptions 40, 41, 42, 45, and 46) related to defects

3   in Verizon's business rule documentation.

4   **Q.   HAS BELLSOUTH AGREED TO MODIFY ITS CHANGE MANAGEMENT**

5   **PROCESS TO PROVIDE CLECS DOCUMENTATION SUFFICIENTLY IN**

6   **ADVANCE OF INTERFACE RELEASES?**

7   No. In its working document for change control, BellSouth has agreed to provide draft

8   user requirements for major releases 90 days in advance of the release implementation

9   date and final user requirements 45 calendar days in advance of the release date.

10 However, this remains entirely insufficient. It provides CLECs very little time to code

11 their interfaces before they must begin testing those interfaces. In its working document,

12 BellSouth rejected CLECs' proposal that final documentation should be provided 45 days

13 in advance of *the CLEC test date*. (BellSouth Change Control Process Working

14 Document, May 18, 2001, Version 2.3 at 21.) Moreover, BellSouth's commitment does

15 not apply to minor releases.

16   In his testimony, Mr. Pate states that BellSouth has committed to providing

17 business rules for industry standard changes four weeks before the CLEC test date. (Pate

18 Direct at 55.) This is not long enough for a major industry standard release. But it is

19 longer than BellSouth has committed to elsewhere and longer than BellSouth has

20 committed to for other major releases or for minor releases. *Id.* BellSouth should

21 commit to provide documentation 45 calendar days in advance of the test date for all

22 major releases and should make this commitment in its change control documentation.

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1   Q.   **DOES BELLSOUTH PROVIDE CLECS SUFFICIENT OPPORTUNITY TO**

2   **TEST THEIR INTERFACES?**

3   A.   No. The FCC has emphasized the importance of a stable testing environment that mirrors

4   the production environment and that enables CLECs to ensure interfaces are ready before

5   they begin using those interfaces. *Id.* ¶¶ 108-09, 111, 119-22; Texas 271 Order ¶¶ 132-

6   43. BellSouth has only recently implemented a CLEC Test Environment that is separate

7   from the production environment. (Pate Direct at 67-68.) Indeed, after MCI launched

8   service in Georgia in April 2001, it could not do additional testing unless it was willing to

9   do so in the production environment, at a risk to our customers, which it was not.

10   Q.   **DOESN'T BELLSOUTH'S NEW "CAVE" TEST ENVIRONMENT RECTIFY**

11   **THE PROBLEM?**

12   We do not yet know. BellSouth recently put in place its "CAVE" testing environment

13   which is a separate testing environment. For the last several weeks, MCI has been

14   attempting to complete the procedural steps needed to use BellSouth's CAVE testing

15   environment, significantly longer than has been needed to take these steps with other

16   LECs, and it appears that it will take an additional several weeks. MCI therefore has no

17   experience with CAVE. Other CLECs also do not have any experience with CAVE.

18   (Pate Direct at 68.) Thus there is not yet any basis for concluding that CAVE is

19   adequate. (Pate Direct at 67-68.)

20   Q.   **ARE THERE ANY OTHER FLAWS IN BELLSOUTH'S CHANGE**

21   **MANAGEMENT PROCESS?**

1   A.   Yes. BellSouth's change management plan does not provide for a go/no go vote

2   that would enable CLECs to preclude implementation of a new release that

3   CLECs have determined does not contain sufficient new functionality to be cost

4   advantageous. The FCC noted approvingly the existence of such a go/no go

5   mechanism in SWBT's change management plan. Texas 271 Order ¶ 112.

6   Because interfaces are developed for the benefit of CLECs and the

7   implementation of a new interface means that a prior version of that interface will

8   be phased out, CLECs should be able to determine whether a new interface will

9   be implemented.

10   Q.   **DOESN'T THE GEORGIA OSS TEST SHOW THAT BELLSOUTH'S**

11   **CHANGE MANAGEMENT IS ACCEPTABLE?**

12   A.   The Georgia OSS test does not demonstrate that BellSouth's change management

13   process is adequate. KPMG did not specifically address some of the problems

14   described here such as the lengthy time frame for implementation of Type 6

15   changes. KPMG appears to concur that other problems exist, despite its

16   conclusion that BellSouth's performance was satisfactory. For example, as noted

17   above, KPMG describes the "backlog of [CLEC] change requests that, at the time

18   of this report, were prioritized but unscheduled for implementation into a release."

19   (Georgia KPMG Report at CM-1-1-3.) KPMG also describes the balloting of

20   proposals designed to help alleviate the backlog and noted that its "change

21   management evaluation concluded prior to CLEC-BLS voting on these balloted

22   items." *Id.* KPMG nonetheless found BellSouth's change control process

23   satisfactory without explaining why.

1   Similarly, KPMG describes BellSouth's failure to follow the change

2   control process in issuing an updated version of business rules in September 2000,

3   and BellSouth's failure to consistently provide proper notification to CLECs for

4   Type 1 system outages between September 2000 and January 2001. (Georgia

5   KPMG Report at CM-1-1-2.) KPMG describes steps BellSouth took to alleviate

6   these problems but does not indicate it conducted any retest to determine that the

7   fixes had worked. (Georgia KPMG Test CM-1-1-2.)

8 Q. **WHAT HAS KPMG FOUND IN FLORIDA CONCERNING CHANGE**

9   **MANAGEMENT?**

10   In Florida, KPMG has several open exceptions and observations regarding

11   BellSouth's change management process. In Florida, KPMG opened Observation

12   21 (December 13, 2000) and later Exception 23 (March 12 2001) on the basis that

13   Bell South's distribution of carrier notification information is inadequate.

14   BellSouth's change control process "does not clearly define when CLECs are to

15   receive notification of documentation updates, or when they are to receive the

16   actual documentation"; moreover, the notifications themselves are missing

17   "significant information." This "can hamper the ability of CLECs to provide

18   service to their customers and conduct business with BellSouth."

19   In Florida, KPMG also opened Observation 26 (no documentation to

20   correlate TAG interface with the version of business rules to which it is

21   applicable). It opened Observation 56 on the basis that "BellSouth implemented

22   business rules updates from the BellSouth Business Rules for Local Ordering –

23   OSS 99, Issue 9L prior to its release on March 30, 2001." In particular, BellSouth

1   changed a field that was conditionally required to one that was conditionally

2   prohibited, leading to rejection of KPMG's order. And on February 14, 2001,

3   KPMG opened Exception 12, finding that "BellSouth does not adhere to the

4   procedures for System Outages." In the majority of cases it fails to notify CLECs

5   of outages or notifies them late. In a retest, BellSouth still only met the system

6   notification standard for 42% of the outages. MCI was not receiving any outage

7   notices in Georgia until the last couple of weeks and has not yet been able to

8   discern whether these notices are being provided in a timely fashion. "Without

9   proper notification of System Outages, CLECs may not be aware of the potential

10   problems that may arise from the outage." *Id.*

11   **Q.** **WHAT IS YOUR OVERALL CONCLUSION CONCERNING**

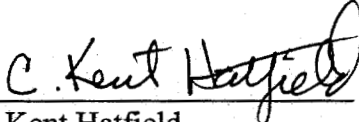12   **BELLSOUTH'S CHANGE MANAGEMENT PROCESS?**

13   BellSouth's change control Process and BellSouth's implementation of that

14   process must undergo a number of improvements before that process can be

15   deemed satisfactory.

16   **Q.** **DOES THAT CONCLUDE YOUR TESTIMONY?**

17   A.   Yes, it does.

Certificate of Service

A copy of the foregoing was served this 9th day of July, 2001, by first class, United States mail, postage prepaid, upon all parties of record.

C. Kent Hatfield
C. Kent Hatfield