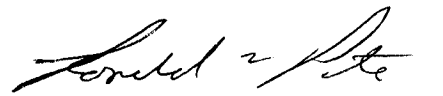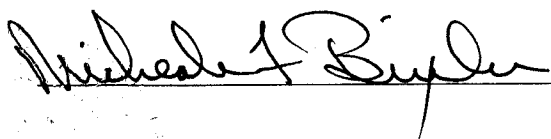# AFFIDAVIT

STATE OF GEORGIA

COUNTY OF FULTON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ronald M. Pate, who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in Case No. 2003-00379, Review of Federal Communications Commission's Triennial Review Order Regarding Unbundling Requirements for Individual Network Elements, and if present before the Commission and duly sworn, his testimony would be set forth in the annexed testimony consisting of __14__ pages and __2__ exhibits.

_____

Ronald M. Pate

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 9th DAY OF FEBRUARY, 2004

_____ Notary Public

MICHEALE F. BIXLER
Notary Public, Douglas County, Georgia
My Commission Expires November 3, 2005

6

7   Q.   PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH

8   TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

9

10   A.   My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc.

11   ("BellSouth") as a Director – Interconnection Operations. In this position, I handle

12   certain issues related to local interconnection matters, primarily operations support

13   systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia

14   30375.

15

16   Q.   PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

17

18   A.   I graduated from the Georgia Institute of Technology in 1973, with a Bachelor of Science

19   degree. In 1984, I received a Masters of Business Administration degree from Georgia

20   State University. My professional career spans over 30 years of general management

21   experience in operations, logistics management, human resources, sales, and marketing. I

22   joined BellSouth in 1987, and have held various positions of increasing responsibility

23   since that time.

24

25   Q.   HAVE YOU TESTIFIED PREVIOUSLY?

1

2   A.   Yes. I have testified before the Public Service Commissions in Alabama, Florida,

3   Georgia, Louisiana, South Carolina and Kentucky, the Tennessee Regulatory Authority,

4   and the North Carolina Utilities Commission.

5

6   Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY?

7

8   A.   The purpose of my testimony is to describe BellSouth's ordering process used when a

9   Competitive Local Exchange Carrier ("CLEC") migrates existing multiple non-complex

10   Unbundled Network Element – Port/Loop Combinations (UNE-P) Services to an

11   Unbundled Network Element – Loop (UNE-L) batch migration offering, including UNE-

12   L plus local number portability (LNP). BellSouth's "UNE-to-UNE bulk migration

13   ordering process," as it has been labeled by BellSouth, is the ordering mechanism for the

14   batch hot cut process that is discussed at length in the testimony of BellSouth's witness,

15   Mr. Ken Ainsworth. Throughout this testimony, I will use the terms "batch" and "bulk"

16   interchangeably when referring to the process of migrating UNE-P to UNE-L in batches.

17

18   I also will discuss the scalability of BellSouth's OSS.

19

20 ORDERING UNE-TO-UNE BATCH MIGRATIONS

21 Q.   PLEASE DESCRIBE THE ORDERING PROCESS FOR BELLSOUTH'S BATCH

22   MIGRATION PROCESS.

23

24 A.   The ordering mechanism for the batch migration process is the UNE-to-UNE batch

25   migration request. The purpose of this ordering mechanism is to allow CLECs to submit

1		multiple UNE-P to UNE-L conversion requests in a streamlined and efficient manner. In
2		other words, the UNE-to-UNE batch migration ordering process allows a CLEC to
3		migrate multiple UNE-P end-users to a UNE-L offering without submitting multiple,
4		individual local service requests ("LSRs").
5		
6	Q.	WHAT ARE SOME OF THE BENEFITS OF THE UNE-TO-UNE BATCH
7		MIGRATION PROCESS?
8		
9	A.	With this electronic process, a CLEC can migrate two to 99 UNE-P accounts to UNE-L
10		on a single submission. Depending on the conditions, CLECs may submit UNE-to-UNE
11		batch migration orders for up to 2,475 end users. I will discuss this in more detail below.
12		
13	Q.	WHEN DID BELLSOUTH IMPLEMENT ELECTRONIC ORDERING OF UNE-TO-
14		UNE BATCH MIGRATION?
15		
16	A.	BellSouth implemented a fully-mechanized, electronic UNE-to-UNE batch migration
17		ordering process on March 29, 2003 with Release 12.0, as a result of change request
18		CR0215.
19		
20		Before implementation of the electronic process, BellSouth implemented a manual batch
21		ordering process on December 4, 2002.
22		
23	Q.	DID A CLEC SUBMIT CHANGE REQUEST CR0215?
24		

1 A.   Yes, on November 11, 2000, AT&T submitted CR0215 to the Change Control Process

2   ("CCP"). This change request asked BellSouth to develop a process for migrating

3   customers from UNE-P to UNE-L in batches. Below is an excerpt from AT&T's change

4   request:

5

6   AT&T would like BellSouth to implement the ability to migrate UNE to UNE

7   orders in bulk. *For example, AT&T is providing service to customers with*

8   *port/loop combinations (UNE-P) and wants to migrate a group of customers from*

9   *UNE-P to UNE-L (BellSouth UNE loop/LNP with AT&T switch).* AT&T would

10   then send a spreadsheet/bulk migration order to BellSouth containing pertinent

11   customer specific information. (Emphasis added.)

12

13   Attached as Exhibit RMP-1 is the change request. The change request is also posted at

14   BellSouth's Interconnection web site.[1]

15

16 Q.   WAS CHANGE REQUEST CR0215 IMPLEMENTED ACCORDING TO THE

17   PROCEDURES OF THE CHANGE CONTROL PROCESS ("CCP")?

18

19 A.   Yes. Change request CR0215 was handled by the CCP from its inception through its

20   implementation in March 2003. Let me provide a chronology of the events leading to the

21   implementation of CR0215.

22

November 8, 2000	AT&T submitted CR0215.
December 18, 2000	The CCP placed CR0215 in pending status.
January 31, 2001	The CLECs prioritized CR0215 as 7th of 14 pre-ordering and ordering change requests.
April 25, 2001	The CLECs re-prioritized CR0215 as 8th of 36 pre-

	ordering and ordering change requests.
February 27, 2002	CR0215 was scheduled for Release 11.0.
March 15, 2002	BellSouth distributed draft user requirements to the CLECs.
April 10, 2002	BellSouth distributed updated draft user requirements to the CLECs.
April 23, 2002	BellSouth and the CLECs held a meeting to discuss the user requirements.
June 20, 2002	BellSouth distributed updated user requirements to the CLECs.
July 9, 2002	BellSouth and the CLECs held a meeting to discuss the user requirements.
October 10, 2002	BellSouth and AT&T discussed BellSouth's ability to support 99 LSRs per bulk order rather than 100.
October 24, 2002	BellSouth distributed updated user requirements.
November 7, 2002	CR0215 was moved to Release 12.0
March 29, 2003	CR0215 was implemented with Release 12.0

1

2 Q.   WHICH COMPANIES PARTICIPATED IN THE USER REQUIREMENTS

3   MEETINGS?

4

5 A.   At the user requirements meeting that occurred on April 23, 2002, representatives of

6   Network Telephone, BTI, Telcordia, AT&T, and Accenture participated, in addition to

7   representatives of BellSouth.

8

9   At the meeting on July 9, 2002, representatives of BellSouth, Allegiance, Network

10   Telephone, AT&T, and Nuvox were in attendance. Every CLEC had the opportunity to

11   participate in the development of this electronic ordering process and AT&T, in

12   particular, was actively involved.

13

1	Q.	DOES BELLSOUTH PROVIDE INFORMATION FOR CLECS THAT ARE
2		INTERESTED IN LEARNING ABOUT AND IMPLEMENTING THE ELECTRONIC
3		ORDERING OF UNE-TO-UNE BATCH MIGRATIONS?

4

5 A.   Certainly. The business rules for ordering UNE-to-UNE batch migrations are contained

6   in the *Local Ordering Handbook* ("LOH"), which is available at BellSouth's

7   interconnection web site.[2] BellSouth has also provided CLECs with the *UNE-Port/Loop*

8   *Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration CLEC Information*

9   *Package* ('CLEC information package"). This document is attached as Exhibit RMP-2,

10   and also is available at the Interconnection web site.[3] The CLEC information package is

11   intended to provide CLECs with general ordering information specific to the UNE-to-

12   UNE batch migration process.   In addition, the Local Exchange Navigation System

13   Guide ("LENS Guide") contains ordering instructions for those CLECs that use the

14   LENS ordering interface. The LENS Guide is posted at the Interconnection web site.[4]

15   For those CLECs that use the EDI interface, BellSouth has provided EDI specifications,

16   which are also posted at the Interconnection web site.[5]

17

18 Q.   WHAT ARE THE CRITERIA THAT CLECS SHOULD CONSIDER WHEN USING

19   THE UNE-TO-UNE BATCH MIGRATION PROCESS?

20

21 A.   The batch migration ordering process must meet the same requirements as the batch hot

22   cut process as a whole. These requirements are described in full in the LOH and

---

[2] http://www.interconnection.bellsouth.com/guides/html/leo.html
[3] The CLEC information package is posted at http://www.interconnection.bellsouth.com/guides/html/unes.html.
When it is updated on February 18, 2004, it will be posted to the same web site. See Carrier Notification
SN91083967 at http://www.interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91083967.pdf
announcing the update.
[4] http://www.interconnection.bellsouth.com/guides/html/lens_tafi.html
[5] http://www.interconnection.bellsouth.com/guides/html/leo.html

1   summarized in the CLEC information package. Some of the current requirements are:

2   the batch migration request must be project managed; the batch migration request must

3   contain a minimum of two LSRs; the batch migration request may contain up to and

4   including 99 LSRs; the batch migration request must be for the same loop type; the

5   existing UNE-P combinations must be non-complex; and, the loops must all be in the

6   same wire center.[6] BellSouth, however, will be enhancing its already seamless and

7   effective batch hot cut process to include, among other things, CLEC-to-CLEC UNE-P to

8   UNE-L batch migrations and CLEC-to-CLEC UNE-L batch migrations. Mr.

9   Ainsworth's testimony contains more information about all the enhancements. Many of

10   them will be available on February 18, 2004.

11

12   Q.   PLEASE DESCRIBE HOW THE CLEC USES THE UNE-TO-UNE BATCH

13   MIGRATION PROCESS.

14

15   A.   As explained by Mr. Ainsworth and the CLEC information package, BellSouth's current

16   process is as follows:

17   1.   A Bulk Notification form is sent from the CLEC to the BellSouth Project

18   Manager (PM) to identify those UNE-P accounts to be converted to a UNE-

19   Loop.

20   2.   The PM reviews the form to determine if the accounts qualify for handling by

21   the Bulk migration process and if the form entries are complete and appear

22   accurate.

23   3.   The PM sends the form to the Network Single Point of Contact (SPOC) to

24   determine load variations, personnel availability, and due date schedule to be

---

[6] Examples of Complex UNE-P are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI
Digital Loop & Port UNE Combination, UNE-P Centrex, Digital Direct Integration Termination Service (DDITS).

1		applied to each of the Earning Account Telephone Numbers (EATN)
2		accounts. The PM will return the Bulk Notification form to the CLEC within
3		the following time period based on the number of telephone number (TN)
4		requests: 7 business days to return to the CLEC a form with up to 99 TNs and
5		10 business days to return a form with between 100 to 199 TNs. The Project
6		Manager will negotiate the return interval for requests of 200+ TNs.
7		4. The Bulk Notification form that has now been updated to include due dates
8		for each of the accounts will be returned to the CLEC via the PM.
9		5. The CLEC has three (3) business days to submit an accurate Mechanized Bulk
10		Local Service Request (LSR) containing the accounts and due dates to
11		BellSouth's Local Carrier Service Center (LCSC). The mechanized system
12		will create individual service orders for each of the accounts that will be
13		provisioned and completed.
14		6. The BellSouth Customer Wholesale Interconnection Network Services
15		(CWINS) Center will advise the PM of any service orders that will not be
16		completed on the due date.
17		7. The PM will advise the CLEC on current order status.
18		
19	Q.	IN STEP 5 ABOVE, YOU MENTIONED THAT THE CLEC MUST SUBMIT A
20		BATCH MIGRATION REQUEST CONTAINING THE ACCOUNTS AND DUE
21		DATES. COULD YOU DISCUSS THIS PROCESS IN MORE DETAIL?
22		
23	A.	Yes. CLECs can use either the EDI, TAG, or LENS ordering interfaces to place a batch
24		migration request. The CLEC first completes information for the entire batch migration

1	package. The LOH refers to this as the "global level."[7] This information includes the
2	Bulk Order Package Identifier ("BOPI") and information about the wire center. The
3	CLEC also completes information about the CLEC initiator and the implementation
4	contact person. If the migration involves designed loops, the CLEC must include contact
5	information, including an address, for the design contact person.[8] The CLEC only enters
6	this global level information once for the entire package.
7	
8	Next, the CLEC completes the information needed for each account of the two to 99
9	accounts that will be migrated. The LOH refers to this as "account level" and "line level"
10	activity. When writing the user requirements, BellSouth developed this functionality so
11	that the CLECs would only fill out a minimum number of fields. Some of the fields that
12	the CLECs are required to complete include the purchase order number ("PON"), the end
13	user's name, the billing account number ("BAN1"), the Earning Account Telephone
14	Number ("EATN"), and the line number ("LNUM"). The complete list of fields is
15	described in the LOH.[9]
16	
17	Q. MUST THE CLECS PROVIDE AN ADDRESS FOR EACH ACCOUNT THAT THEY
18	ARE MIGRATING?
19	
20	A. No, CLECs do not include an address for each account. Only if the migration involves
21	designed loops must the CLEC include address information for the design contact person,
22	and only at the "global level" of the batch migration request.
23	

---

[7] The LENS Guide refers to this level as the "Package Level."
[8] Designed loops require BellSouth to perform design engineering activities.
[9] The LENS Guide also contains similar information for users of the LENS interfaces. The "account level" and "line level" fields are referred to as the "PON level" in the LENS Guide.

1   BellSouth has simplified the number of fields that the CLECs must complete at the

2   "account level" and "line level" for each end user on the batch migration request.

3   BellSouth was able to reduce the required information to the minimal amount necessary

4   for conversions from UNE-P to UNE-L. To create the individual LSRs for UNE-L,

5   BellSouth needs information that the CLEC has, such as the cable and pair information,

6   the cable ID, and, when necessary, the reservation number for the facility (the Facility

7   Reservation Number or "FRN"). BellSouth could not reduce the number of required

8   fields for UNE-P to UNE-L migration to the number used when the CLECs submit a "TN

9   migration" or "Telephone Migration" LSR. When the CLEC converts a retail or resale or

10   UNE-P end user to its UNE-P, the CLEC can submit an LSR with just the end user's

11   telephone number (in addition to information about the gaining CLEC), hence the name

12   "TN migration."

13

14   Q.   PLEASE DESCRIBE WHAT HAPPENS WHEN THE CLEC SUBMITS THE BATCH

15   MIGRATION REQUEST VIA THE EDI, TAG, OR LENS ORDERING INTERFACES.

16

17   A.   After BellSouth's systems receive the batch migration request, the first level edits are

18   applied in order to check the request for errors. If there are no first level errors in the

19   batch migration request, BellSouth's systems will accept the batch migration request and

20   break the accounts into individual parts. BellSouth's systems then generate the

21   individual LSRs, using the information provided by the CLEC at the account and line

22   levels of the batch migration. For example, the systems take the telephone number that

23   the CLEC provided for an individual PON and retrieve an address from the address

24   database (the Regional Street Address Guide or RSAG). The individual LSRs are

25   checked against the second and third level edits to determine if the data on the LSR is

1   correct. Accurate and complete LSRs flow-through BellSouth's OSS to the service order

2   generator (Service Order Communications System or "SOCS"), where a service order is

3   generated from each LSR. BellSouth then sends a firm order confirmation ("FOC") to

4   the CLEC for each LSR. The service orders then move downstream for provisioning,

5   including updating E911 databases and directory listing information, just as they would

6   for service orders created from LSRs submitted individually.

7

8   Q.   WHAT HAPPENS WHEN A BATCH MIGRATION REQUEST CONTAINS AN

9   ERROR?

10

11   A.   After BellSouth's systems receive the batch migration request, they check the request for

12   errors. BellSouth's systems perform these checks by applying first level edits to the batch

13   migration request. The first level edits are straightforward and basic – they are related to

14   field length, allowable characters, required, optional, and "not allowed" fields, and the

15   relationships between fields. BellSouth checks the entire batch migration request for

16   these types of errors before returning it to the CLECs. If a batch migration request

17   contains a first level error or errors, BellSouth returns it to the CLEC. The CLEC may

18   then correct the error or errors and submit a supplemental batch migration request to

19   BellSouth.

20

21   Q.   WHY DOES BELLSOUTH RETURN THE ENTIRE BATCH REQUEST TO THE

22   CLEC?

23

24   A.   The first level edits simply determine if the CLEC provided enough information so that

25   BellSouth's systems can create the individual LSRs. If the CLEC has not provided the

11

1   correct information in those fields, then BellSouth cannot generate the individual LSRs.

2   Also consider that, if the CLEC makes an error or errors in the "global" section of the

3   request, all the potential LSRs in the request would be affected. At this stage of the

4   process, returning the incorrect batch migration request to the CLEC is equivalent to

5   rejecting and returning an incorrect LSR that a CLEC has submitted individually.

6

7 Q.   AFTER BELLSOUTH'S SYSTEMS HAVE CREATED INDIVIDUAL LSRS FROM

8   THE BATCH MIGRATION REQUEST, WHAT HAPPENS IF AN ERROR IS

9   DETECTED IN AN INDIVIDUAL LSR?

10

11 A.   After BellSouth's systems have created the individual LSRs from the batch migration

12   request and information in BellSouth's systems, BellSouth will clarify any mistakes that

13   are found in the individual LSRs on an individual basis. Thus, if one LSR out of 99 has

14   an error, the 98 error-free LSRs will continue to process. BellSouth finds these errors

15   when its systems apply the second and third level edits. Level 2 data edits verify that the

16   fields in the LSR contain the correct information, such as whether the telephone number

17   supplied by the CLEC is known by BellSouth's systems. Third level edits continue the

18   evaluation of the data in the fields of the LSR, such as comparing a given Universal

19   Service Order Code ("USOC") and any associated Field Identifiers ("FIDs") in a service

20   order to ensure that the FIDs are allowed and in the proper order.

21

22   Therefore, if any data errors are found in any of the LSRs, BellSouth then clarifies the

23   LSR individually with the CLEC, just as it would with any LSR submitted individually.

24

12

1	Q.	EARLIER YOU STATED THAT A CLEC MAY REQUEST A MAXIMUM OF 99
2		ACCOUNTS IN A BATCH MIGRATION. PLEASE PROVIDE MORE DETAIL.
3		
4	A.	Each UNE-to-UNE batch migration request may contain a maximum of 99 accounts,
5		each identified by a PON and an Earning Account Telephone Number ("EATN"). A
6		CLEC can, however, include a maximum of 25 end-user telephone numbers per EATN.
7		If a CLEC has accounts of this nature in the same wire center, the CLEC could
8		conceivably migrate as many as 2,475 end users (99 EATN X 25 TN) per batch
9		migration.
10		
11		<u>OSS SCALABILITY</u>
12	Q.	ARE BELLSOUTH'S OSS SCALABLE?
13		
14	A.	Yes, BellSouth's existing ordering OSS are scalable, and are designed to accommodate
15		both current and projected volumes of LSRs.
16		
17		The Florida KPMG Third Party Test, at Section TVV2, provided confirmation that
18		BellSouth's ordering OSS responded effectively to normal, peak and stress volume
19		testing. "Normal" volume was defined as 100% of projected LSR submissions, and
20		"peak" and "stress" volumes were defined as 150% and 250% of "normal," respectively.
21		BellSouth passed all of these test criteria.
22		
23		BellSouth's commercial usage further confirms the ability of BellSouth's OSS to handle
24		high volumes. For the three month period October through December 2003, an average
25		number of 772,044 LSRs were submitted via the electronic ordering OSS applications.

1   Moreover, it is important to remember, even if all UNE-P orders changed to UNE-L, that

2   does not change the total ordering volume that BellSouth is handling very capably today.

3

4 Q.   DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A.   Yes.

7

BELLSOUTH

Change Request Form

_____

_

Complete and email this form to Change.Control@bridge.bellsouth.com or Fax to BellSouth Interconnection Services at 205-321-5160. Please note that line-by-line instruction is attached for completion of this form.

_____

Internal Reference # _____(1)   Date Change Request Submitted _11_/_8_/_00(2)

☒ **TYPE 5 (CLEC**)   ☐ **TYPE 4 (BST)**   ☐ **TYPE 3 (INDUSTRY)**   ☐ **TYPE 2 (REGULATORY) (3)**

☐ **TYPE 6 (DEFECT/EXPEDITE)**   OCN _____(3A)

Company Name____AT&T_____(4)

CCM____Jill Williamson _____(5)   Phone__404-810-8562_____(6)

CCM Email Address _jrwilliamson@att.com_____(7)   Fax___404-810-8605_____(8)

Alternate CCM_ _____(9)   Alt Phone # _____(10)

Originator's Name _Jill Williamson _____(11) Phone__404-810-8562_____(12)

Title of Change ____UNE to UNE Bulk Migrations_____(13)

Category ☒ Add New Functionality   ☐ Change Existing (14)   Desired Due Date _5_/_31/00_(15)

Originating CCM assessment of impact   ☒ High   ☐ Medium   ☐ Low   (16)

Originating CCM assessment of priority   ☒ Urgent ☐ High   ☐ Medium   ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering	☒ Ordering	☐ Maintenance	☐ Manual
☐ LENS	☒ EDI ☒ LNP	☐ TAFI	
☐ TAG	☒ LENS	☐ EC-TA Local	
☐ CSOTS	☒ TAG		

Type Of Change - Check one or more, as applicable (19)			
☐ Software	☐ Hardware	☐ Industry Standards	☐ Defect/Expedite
☐ Product & Services	☒ New or Revised Edits	☒ Process	
☐ Documentation	☐ Regulatory	☐ Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20) _AT&T would like BellSouth to implement the ability to migrate UNE to UNE orders in bulk. For example, AT&T is providing service to customers with port/loop combinations (UNE-P) and wants to migrate a group of customers from UNE-P to UNE-L (BellSouth UNE loop/LNP with AT&T switch). AT&T would then send a spreadsheet/bulk migration order to BellSouth containing pertinent customer specific information. An option for doing the migrations (done by another ILEC) is that BellSouth and AT&T would schedule the cuts by central office to take place over a weekend. Our experience with this process has been a very low number of customer outages.

_____
_____

Attachment A-1

BELLSOUTH

Change Request Form

Known dependencies (21)

_____

_____

Additional Information ☐ Yes ☐ No (22)

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

This Section to be completed by BCCM only.

Change Request Log #_____CR0215_____(23)   Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25)   Clarification Response Due ___/___/___ (26)

Status _____**I**_____(27)

Change Request Review Date _01/31/01_/ 04/25/01_(28)

Target Implementation Date __**3/29/03 – 3/30/03_ - Release 12.0** (29)

Last Modified By _____BCCM_____ (30)   Date Modified __04/07/03_ (31)

Change Review Meeting Results (32)

12/18/00 BellSouth placed this request in Pending Status.

2-5-01 Prioritized at 1-31-01 Change Review Meeting by CLEC community.

3-15-01 Non-scheduled change request to be re-prioritized at 3/28/01 meeting.

4-30-01 CR prioritized on 4-25-01. Refer to "Release Prioritization Ranking" on CCP Web site.

2-27-02 Scheduled for Release 11.0 on 11/16/02-11/17/02.

3-15-02 Draft user requirements distributed.

3-25-02 UNE to UNE Bulk Migrations user requirement review to be scheduled for a later date (changed from 4-2-02). Additional information being obtained to include in the review meeting.

4-10-02 Updated draft user requirements for UNE to UNE Bulk Migrations distributed. User Requirement Review meeting scheduled for 4-23-02.

4-23-02 User Requirements Review Meeting held. EDI Technical issues are currently being investigated by BST because there are no bulk order formats in the EDI standards. CR0215 may be a phased approach if it is determined that EDI can support bulk ordering.   EDI may not be included in the November 2002 delivery. Additional information to be provided.

Attachment A-1

@ **BELL**SOUTH   **Change Request Form**

5-20-02 Distributed the following information to the CLEC community: BST will provide UNE to UNE Bulk Ordering for CLECs using Connect:Direct only. The format of the data will be non-standard, which will require CLECs to perform some coding (non-OBF, non-TCIF standard formats are necessary). The EDI Specifications required by BST to manage UNE to UNE Bulk Ordering will be a .csv (comma) delimited file from the CLEC. There will be no data base to create an individual 860 (SUP). Each CLEC will be required to create and manage each individual SUP. New bulk specifications will be posted to the Interconnection web site six weeks prior to EDI code being placed in CAVE.

6-5-02 Implementation date for Release 11.0 changed to 12/7/02-12/8/02. CAVE and Production Implementation of Release 11.0 changed to allow BST additional time to perform internal testing and CLECs additional time to test software in CAVE.

6-20-02 Final user requirements distributed to the CLEC community. Follow-up review meeting scheduled for July 9, 2002.

7-9-02 Follow-up meeting held with the CLEC community to review the final user requirements.

10-10-02 Conference call held with AT&T/BST to discuss constraints with receiving 100 LSRs (EATNs) in a single order. BST can support 99. Updated user requirements will reflect this change. AT&T will follow-up internally to determine if this is a major concern and will communicate this to CCP by 10/18/02. BST requested that AT&T participate in the testing effort.

10-24-02 Change from 100 EATNs to 99 in a single bulk package discussed at 10-23-02 CCP meeting. Updated user requirements distributed to the CLEC community.

11-7-02 CR0215 moved to Release 12.0, which is scheduled for implementation on 3/29/03-3/30/03.

04/07/03 CR0215 implemented with Release 12.0 on 03/29/03.

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

_____

_____

_____

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

_____
_____
_____

Agreed Release Date ___/___/___ (37)   CMVC #_____(38)
                                                     DDTS#_____(39)

Attachment A-1

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

@ BELLSOUTH   **Change Request Form**

This section to be completed by BellSouth – Internal Validation of Defect/Expedite Change Request

Defect/Expedite Validation Results: (40)

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Clarification Needed   ☐ Yes   ☐ No

☐ Defect   ☐ Expedite   ☐ Feature   ☐ Training Issue   ☐ Duplicate   ☐ Cancel

Defect/Expedite Impacts Other CLECs? ☐ Yes ☐ No

Interfaces Impacted by defect/expedite: ☐ EDI   ☐ TAG   ☐ LNP   ☐ LENS

                                          ☐ TCIF 7   ☐ TCIF 9

Target Implementation Date: _____

Attachment A-1

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

UNE-P to UNE-L Bulk Migration

UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration

CLEC
Information Package

Version 1

UNE-P to UNE-L Bulk Migration

Table of Contents

UNE-P to UNE-L Bulk Migration

1. Introduction & Scope

This Product Information Package is intended to provide CLECs general ordering information specific to the **UNE-P** to **UNE-L** Bulk Migration process described herein.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Local Support Manager if you have any questions about the information contained herein.

UNE-P to UNE-L Bulk Migration

2. Service Description

The Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration process may be used by a CLEC when migrating existing multiple non-complex UNE-P Services to a UNE-L offering.

All Bulk Migration orders will be project managed by a BellSouth Project Manager. Initially, the CLEC will submit required information to a BellSouth Project Manager who after reviewing the bulk migration work effort with the field organizations will provide due dates back to the CLEC. Once the CLEC receives the due date information from the BellSouth Project Manager, the CLEC will electronically submit a Bulk Request for service order processing and provisioning. This allows migration of multiple UNE-P end-users to a UNE-L offering without submitting individual Local Service Requests.

UNE-P and UNE-L are defined below:

2.1 UNE-P

UNE-P is a UNE Port/Loop Switched Combination that combines a UNE local switch port and UNE loop to create an end-user-to-end-user transmission path and provides local exchange service. The CLEC may also choose to use the vertical services that are available through the features and functions of the local switch.

2.2 UNE-L

UNE-L is defined as the local loop network element that is a transmission facility between the main distribution frame (MDF) in BellSouth's central office and the point of demarcation at an end-user's premises. This facility will allow for the transmission of the CLEC's telecommunications services when connected to the CLEC's switch equipment. The local loop will require cross-connects for connection to the CLEC's collocation equipment. BellSouth does not provide telecommunications services with the UNE-L.

UNE-P to UNE-L Bulk Migration

3. Requirements

Major requirements for UNE-P to UNE-L Bulk Migration process are listed below. For complete requirements, refer to the **UNE to UNE Bulk Migration** section of the **Local Ordering Handbook** *(formerly named "BellSouth Business Rules for Local Ordering")*

- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services to Unbundled Loops with Local Number Portability (LNP).

- A UNE Loop will be provided for each ported telephone number formerly associated with the UNE-P Service.

- Complex UNE-P accounts are prohibited on Bulk Requests. Examples of Complex UNE-P are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P Centrex, Digital Direct Integration Termination Service (DDITS), etc.

- The UNE-Ps that can be migrated are listed in the **UNE-P USOC** section.

- UNE-Ps can be migrated to the UNE-Ls listed in the **UNE-L USOC** section. These UNE-L types must be in the CLEC's Interconnection Agreement.

- Bulk Requests that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status, must be cancelled by the CLEC and removed from the Bulk Request.

- All Existing Account Telephone Numbers (EATNs) on the Bulk Request must use the existing Regional Street Address Guide (RSAG) valid end-user address.

- All EATNs must be served from the same BellSouth Serving Wire Center (SWC).

- All UNE-Ps on a Bulk Request must be migrated to a single UNE-L type.

- No end-user moves or changes of address will be allowed on the Bulk Request.

- Non-Recurring rates for the specific loop type being requested will be charged.

- Service order charges for mechanized orders (SOMEC) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request.

- A BellSouth Project Manager (PM) will project manage the Bulk Request.

- CLEC must submit a **BellSouth UNE-P to UNE-L Bulk Migration Project Notification**, herein known as **Project Notification,** to the BellSouth PM prior to the CLEC's placing the mechanized Bulk Request.

- CLEC may specify Desired Due Dates (DDD) for each EATN. However, the BellSouth PM will negotiate firm Due Dates for the Bulk Request.

- A minimum of two (2) EATNs and up to a maximum of ninety-nine (99) EATNs can be placed on a single Bulk Request.

- A maximum of twenty-five (25) end-user telephone numbers per EATN can be placed on a Bulk Request.

- No additional EATNs or end-user telephone numbers may be added to the *BellSouth UNE-P to UNE-L Bulk Migration Project Notification* form once it has been submitted to the BellSouth PM.

UNE-P to UNE-L Bulk Migration

Requirements (continued)

- Order Coordination-Time Specific option is not applicable for a Bulk Request.

- UNE-Ls that require a Service Inquiry and/or Unbundled Loop Modification are excluded from the Bulk Request process.

- A Reservation Identification (RESID) (also referred to as a Facility Reservation Number (FRN)) is required on the Bulk Request for Unbundled ADSL Compatible Loops, HDSL Compatible Loops and Unbundled Copper Loop - Designed (UCL-D). Refer to the **Unbundled ADSL and Unbundled HDSL Compatible Loop, UCL-Designed CLEC Information Packages** and **Loop Make-Up CLEC Information Package** for RESID/FRN requirements.

- When a Mechanized Loop Make Up with Facility Reservation Number (FRN) is requested, the CLEC must submit the Bulk Request with the FRN to BellSouth within 24 hours of receiving FRN.

- Firm Order Confirmation (FOC) will be sent on individual LSRs generated from the Bulk Request.

- Upon receipt of a Reject, CLEC must re-submit a corrected Bulk Request or submit a cancellation of the Bulk Request.

4. Options

- Order Coordination (OC) /Coordinated Hot Cut (CHC) is included on the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops.   OC is available when the loop is provisioned over an existing circuit that is currently providing service to the end-user.

- OC is available as a chargeable option for conversions to UVL-SL1, UCL-ND and UCL-Designed Loops. OC must be requested at the EATN level on the Project Notification form. An OC charge will be applied to each loop on the EATN for which OC has been requested.   OC will be indicated on Project Notification and will not be required on the Bulk Request LSR at this time.

- The CLEC may qualify the existing UNE-P facilities for the UNE-L types requested. For example, through Loop Make-Up (LMU), the CLEC can verify that a UNE-P facility being migrated is not on an Integrated Digital Loop Carrier (IDLC). When the existing UNE-P facility is on IDLC, the CLEC can reserve alternate compatible facilities if available.

UNE-P to UNE-L Bulk Migration

5. Bulk Migration Submission/Flow Process

The Bulk Request Submission Process will consist of two main work activities. The CLEC will first submit a Project Notification. Once the Project Notification has been processed and returned to the CLEC, the CLEC will then prepare and input the mechanized Bulk Request. The Bulk Request must be submitted according to the guidelines contained in the **Local Ordering Handbook.** Below are the steps in the process :

Step #	Action
1	PM receives Project Notification form from CLEC and negotiates/assigns Bulk Order Package Identifier (BOPI) and validates information (i.e., USOCs, Same Wire Center, etc.).
2	If pertinent information is missing on the Project Notification package, the form is returned to CLEC along with a reason(s) for return. PM receives corrected Project Notification from the CLEC and continues the negotiation process.
3	PM contacts BellSouth's Network organization and negotiates Due Date (DD) for all related Purchase Order Numbers (PONs) in the Bulk package and returns Bulk Notification Form including negotiated DD to the CLEC.
4	Upon receipt of the Bulk Notification Form that includes negotiated DD from PM, CLEC submits Bulk Request package with negotiated dates for each EATN/PON via electronic ordering interface.
5	If the CLEC wants to supplement (SUP) (01,02,03) an individual PON, the request <u>must</u> be sent through the same electronic ordering system as the original Bulk Request.
6	At this point, the Bulk Request package will be processed for 1st level validation and any rejects will be mechanically generated to the CLEC.
7	The electronic ordering systems will accept the Bulk Request package, break the individual PONs into separate LSRs and populate the remaining required LSR fields from Operation Support System (OSS) systems prior to sending the individual LSRs downstream to the Local Number Portability (LNP) Gateway.
8	The LNP Gateway will perform 2nd level validations and provide any fallouts, per "business as usual" processes. The Local Carrier Service Center (LCSC) will handle all fallouts as normal. Any of the individual PONs that must be clarified will be sent back to the CLEC, business as usual.
9	After LNP Gateway issues the service orders, the LCSC will handle all manual service order fallouts as normal. The BellSouth Service Representative will send any PF and Missed Appointments (MA) to the CLEC via a jeopardy notice.
10	LNP Gateway will send an FOC on each individual PON associated with the Bulk Request package, to the CLEC.
11	The Project Manager will monitor PON, Service Order and Porting Statuses associated with the Bulk Request package. BellSouth's Service Representative and Project Manager will monitor the LNP gateway for the "Number Ported" messages and the Service Representative will handle manual port out order processing if required.

UNE-P to UNE-L Bulk Migration

6. BellSouth UNE-P to UNE-L Bulk Migration Project Notification Process

Following is the Project Notification process:

- Complete the **BellSouth UNE-P to UNE-L Bulk Migration Project Notification** form according to the instructions.

- Electronically submit the ***Project Notification*** to the email address of the CLEC's assigned BellSouth Project Manager (PM). For help with identifying a Project Manager, contact your BellSouth Customer Support Manager.

- The BellSouth PM will review the information submitted by the CLEC and will assign a Bulk Order Package Identifier (BOPI) that the CLEC will later use on the electronic Bulk Request.

- The BellSouth PM will coordinate with BellSouth's field forces to schedule the migration Due Dates.

- Once the review with the field forces is complete, the BellSouth PM will include the Due Dates on the ***Project Notification*** and return it to the CLEC.

- No additional EATNs or end-user telephone numbers may be added to the ***Project Notification*** form once it has been submitted to the BellSouth PM.

Exhibit RMP-2

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UNE-P to UNE-L Bulk Migration

7. UNE-P USOCs

The UNE-P Services that can be migrated to UNE-L are represented by the Port USOCs listed in the table below:

Port USOC	Unbundled Port/Loop Combination Element	Description of Combinations using an Unbundled Exchange Port (UEP):
UEPBX	UEPLX	UEP, Business, 2 Wire Analog Business Line Port, UNE=P Basic Class of Service
UEPRX	UEPLX	UEP, Residence, 2 Wire Analog Residence Line Port, UNE-P Basic Class of Service
UEPCO	UEPLX	UEP, Coin Basic Class of Service UNE-P
UEPBV	UEPLX	UEP, Remote Call Forwarding, Business Basic Class of Service
UEPVR	UEPLX	UEP, Remote Call Forwarding, Residence Basic Class of Service

8. UNE-L USOCs

Below are the UNE-L types and associated USOCs to which the UNE-Ps can be migrated:

Loop USOC	Description
UEAL2	2 Wire Unbundled Voice Loop – SL1
UEAL2, UEAR2	2 Wire Unbundled Voice Loop – SL2
UCLPW	2 Wire Unbundled Copper Loop/Short– Designed without manual Service Inquiry
UCL2W	2 Wire Unbundled Copper Loop/Long - Designed without manual Service Inquiry
UCL4W	4 Wire Unbundled Copper Loop/Short – Designed without manual Service Inquiry
UCL4O	4 wire Unbundled Copper Loop/Long – Designed without manual Service Inquiry
UEQ2X	2 Wire Unbundled Copper Loop – Non-Designed
UAL2W	2 Wire Unbundled ADSL Loop without manual Service Inquiry
UHL2W	2 Wire Unbundled HDSL Loop without manual Service Inquiry
UHL4W	4 Wire Unbundled HDSL Loop without manual Service Inquiry

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9. Intervals

9.1 BellSouth UNE-P to UNE-L Bulk Migration Project Notification Interval

- The "*PM Targeted Response Interval*" column in the table below represents the underlined targeted number of business days in which the PM will respond back to the CLEC.

- CLEC must submit the **Project Notification** in advance of the earliest CLEC's requested Desired Due Date (DDD) according to the "*Minimum # of days in advance to submit Project Notification*" column in the table below. This column represents the number of days that the Project Notification must be submitted in advance of the earliest DDD.

- "*Minimum # of days*" includes the interval for the Project Manager to negotiate the Due Dates. It also allows three (3) days for the CLEC to correct, process and submit mechanized Bulk Request and it includes 14 days in order to meet the 14-business day submission requirement for the Bulk Request.

- The PM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

# of end-user Tel. Numbers	PM Targeted Response Interval	CLEC days after receipt from Proj Mgr	Bulk Request Submission Requirement	Minimum # of days in advance to submit Project Notification
Maximum of 99	7 business days	3 business days	14 business days	24 business days
100-200	10 business days	3 business days	14 business days	27 business days
201 +	To be determined	3 business days	14 business days	Contact PM

9.2 Bulk Request Service Order Intervals

- The BellSouth Project Manager will negotiate the Bulk Request due dates with BellSouth's provisioning personnel and will communicate the due date to the CLEC.

- The CLEC must submit the Bulk Request and it must be accepted by the mechanized system at least 14 business days in advance of the earliest Due Date for any end-user telephone number to be migrated.

9.3 Example of Intervals

An example of Intervals follows:

CLEC submits Project Notification with 87end-user telephone numbers on May 1, 2003:

- May 12, 2003 (7 business days) – CLEC receives Project Notification with firm Due Dates
- May 12 – May 15 (3 business days) – CLEC will prepare and submit mechanized Bulk request via the electronic interface.
- June 5, 2003 (14 business days) – the earliest PM assigned Due Date on the Project Notification returned to the CLEC.

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UNE-P to UNE-L Bulk Migration

10. Acronyms

ADSL	Asymmetrical Digital Subscriber Line
BOPI	Bulk Order Package Identifier
CHC	Coordinated Hot Cut
CLEC	Competitive Local Exchange Carrier
DDD	Desired Due Date
EATN	Existing Account Telephone Number
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
HDSL	High-Bit-Rate Digital Subscriber Line
LCSC	Local Carrier Service Center
LNP	Local Number Portability
LSR	Local Service Request
MDF	Main Distribution Frame
OC	Order Coordination
OSS	Operation Support System
PM	Project Manager
PON	Purchase Order Number
RESID	Reservation Identification
RSAG	Regional Street Address Guide
SWC	Serving Wire Center
UCL-D	Unbundled Copper Loop – Designed
UCL-ND	Unbundled Copper Loop – Non-Designed
UNE-P	Unbundled Network Element-Port/Loop Combination
UNE-L	UNE Loop