

COMMONWEALTH OF KENTUCKY

**BEFORE THE**

**KENTUCKY PUBLIC SERVICE COMMISSION**

In Re: )  
Implementation of the Requirements Arising )  
From the Federal Communications )  
Commission's Triennial Review Order, Order )  
03-36, Unbundled Local Circuit Switching for )  
Mass Market Customers and Establishment of )  
a Batch Cut Migration Process. )

Case No. 2003-00379

**DIRECT TESTIMONY OF SHERRY LICHTENBERG**

On Behalf Of

**MCIMETRO ACCESS TRANSMISSION SERVICES, LLC**

**AND**

**MCI WORLDCOM COMMUNICATIONS, INC.**

February 11, 2004

1   **Q.   PLEASE STATE YOUR NAME, EMPLOYER AND TITLE.**

2   A.   My name is Sherry Lichtenberg. I am currently employed by MCI as Senior  
3       Manager, Operational Support Systems Interfaces and Facilities Development.

4   **Q.   PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE.**

5   A.   I have twenty-two years of experience in the telecommunications market, fifteen  
6       years with AT&T and seven with MCI. I joined MCI in 1996 as a member of the  
7       initial team responsible for the development of MCI's local services products,  
8       both UNE-P and facilities-based. Prior to joining MCI, I held a number of  
9       positions at AT&T, including working in the General Departments organization,  
10      where I developed methods and procedures and billing and ordering systems for  
11      use by the Bell Operating Companies and later American Bell. I was Pricing and  
12      Proposals Director for AT&T Government Markets, and Executive Assistant to  
13      the President and Staff Director for AT&T Government Markets. I also held a  
14      number of positions in Product and Project Management. My current role with  
15      MCI includes designing, managing, and implementing MCI's local  
16      telecommunications services to residential and small business customers on a  
17      mass-market basis nationwide. I support both UNE-P product development and  
18      our testing and planning for facilities based competition via UNE-L. I have  
19      testified in numerous proceedings before the FCC and state public service  
20      commissions including multiple state 271 proceedings, network modernization  
21      proceedings and a variety of DSL proceedings. In addition, I have worked with  
22      the MCI carrier management and contracts teams to negotiate our interconnection  
23      agreements with the incumbents.

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
2 **PROCEEDING?**

3 A. The purpose of my testimony is to address operational barriers to the deployment  
4 of mass markets UNE-loops. The discussion of operational barriers falls into two  
5 categories: network operational issues and customer impacting operational issues.  
6 My testimony addresses the customer impacting operational issues, while MCI's  
7 network operational testimony discusses the network barriers that exist today.

8 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

9 A. After much work to develop interfaces and conquer operational problems, MCI  
10 launched residential local service in Kentucky in 2002 and now provides local  
11 service to tens of thousands of Kentucky consumers via UNE-P, the only service  
12 delivery method that has proved successful thus far in bringing local service to the  
13 mass market. MCI is now evaluating a move to a UNE-L service delivery method  
14 when and where it is economically and operationally feasible, because MCI  
15 would prefer to serve these customers whenever possible over its own facilities  
16 and because it wants to provide voice and DSL service using the same network.  
17 Today, installing a customer on UNE-L in mass markets volumes and  
18 transitioning from UNE-P to UNE-L are complicated and difficult processes, in  
19 large part because of the customer impacting operational problems that I discuss  
20 below. Such problems must be understood and resolved in the context of today's  
21 multi-carrier market, both with respect to customer expectations and developing  
22 competition among carriers.

1           Today’s customers have experienced relatively seamless migrations  
2           among long distance carriers, and increasingly among local carriers as well. They  
3           will judge their experience with UNE-L carriers by the same standards, and thus  
4           so should the Commission. Today’s competitive landscape involves a number of  
5           carriers with significant consumer customer bases, so it is no longer sufficient just  
6           to consider whether BellSouth can effect a customer’s initial migration from  
7           UNE-P to that same CLEC using UNE-L. Now the entire industry must be taken  
8           into account, because it is just as important that subsequent migrations from one  
9           CLEC to another be transparent to the customer. Unlike the 271 process, where  
10          the primary issue was BellSouth’s ability to provide competitive carriers access to  
11          the systems and processes necessary to migrate customers from retail to wholesale  
12          services, this proceeding concerns whether customers can move freely among all  
13          carriers regardless of service delivery method. Competition cannot flourish  
14          unless customers can do so.

15                 In this context, the operational issues I discuss below are critical. Those  
16          issues involve the extensive manual ordering and provisioning processes and  
17          multi-carrier coordination currently required for UNE-L migration, as well as the  
18          exchange of information concerning the databases for customer service records  
19          (“CSRs”), the Local Facilities Administration and Control System (“LFACS”),  
20          E911, the National Number Portability Administration Center (“NPAC”), the  
21          Line Information Database (“LIDB”), the Caller Name Database (“CNAM”),  
22          Directory Listing/Directory Assistance (“DL/DA”), and printed directories. I  
23          also will discuss issues that must be addressed with respect to trouble handling.

1 In addition to outlining these issues, I also have suggested approaches to  
2 addressing them, which should at least provide a starting point for resolution.  
3 Additional issues are certain to arise as MCI and other carriers gain experience  
4 with UNE-L, and thus the Commission will need to play a continuing role to  
5 ensure that all operational barriers to UNE-L implementation are addressed and  
6 resolved.

7 Moving existing customers from UNE-P to UNE-L (the batch hot cut  
8 process described by the FCC) is only one small piece of the new processes that  
9 will be required to maintain the level of competition in Kentucky in a facilities-  
10 based world. Even if customers who are already served by a CLEC can be  
11 transitioned to a new carrier using a batch hot cut process – what then? How will  
12 customers continue to be able to migrate among other carriers as they do today  
13 with UNE-P?

14 Rolling access, whereby customers were acquired via UNE-P and then  
15 transitioned to UNE-L using batch hot cuts, would not solve these operational  
16 problems either. Rolling access would only address the initial migration from  
17 BellSouth to a CLEC, and not subsequent migrations between carriers. Moreover,  
18 rolling access would not address the operational issues I discuss below; indeed, it  
19 might exacerbate such problems, since these customers must first be provisioned  
20 on one service – and receive and activate one set of features – and then be  
21 provisioned on another, with potentially different features and the need to activate  
22 them once again. In the final analysis, there is no “silver bullet” that will solve all  
23 the operational problems involved in rolling out UNE-L to the mass market and

1 particularly residential customers. As with UNE-P, these problems will have to  
2 be solved one at a time with the Commission's oversight and with the active  
3 involvement of all industry players.

4 In short, numerous customer impacting operational barriers currently  
5 render CLEC entry via UNE-L uneconomic throughout Kentucky, and the  
6 Commission should so find. Upon reaching this conclusion (if not beforehand),  
7 the Commission should work with the industry to address that impairment so that  
8 the operational barriers that currently exist may be removed.

**MCI's Kentucky Local Mass Market Service**

9  
10 **Q. WHY IS IT IMPORTANT FOR THE COMMISSION TO CONSIDER**  
11 **CLECS' EXPERIENCE IN ENTERING THE KENTUCKY LOCAL**  
12 **CONSUMER MARKET?**

13 A. A review of CLECs' experience to date with UNE-P should provide the  
14 Commission with a general understanding of the kinds of obstacles that must be  
15 overcome in developing and implementing a new service delivery method. And  
16 consideration of CLECs' fledgling efforts to implement UNE-L will provide  
17 insight into the real-world operational challenges that CLECs face when  
18 attempting to serve the mass market with their own switches. Further, CLECs'  
19 efforts to enter the Kentucky local consumer market shed light on what consumers  
20 have come to expect when they migrate from one local service provider to  
21 another. Understanding those consumer expectations is a key part of recognizing  
22 and addressing operational problems.

23 **Q. WHAT IS THE DIFFERENCE BETWEEN UNE-P AND UNE-L?**

1 A. UNE-P involves the leasing of the piece parts of BellSouth's network on an end-  
2 to-end basis. When a customer is migrated from BellSouth to a UNE-P CLEC, no  
3 changes are made to the physical facilities used to serve the customer. To date,  
4 UNE-P has been the only service delivery method that has enabled CLECs to  
5 serve residential and small business customers on a broad scale and will continue  
6 be the only way to provide such service for some time.

7 In contrast, UNE-L involves leasing the customer's loop, terminating that  
8 loop to a CLEC's collocation space in BellSouth's central office (assuming the  
9 CLEC has such a space), and transporting calls to the CLEC's switch from which  
10 the customer draws dial tone and receives local service. Migrating a customer  
11 from BellSouth today to a UNE-L CLEC requires the customer's loop to be "cut  
12 over" from the BellSouth switch to the CLEC's collocation equipment while the  
13 customer's service is still "live," thus giving rise to the term "hot cut." Hot cuts  
14 are required in all UNE-L scenarios, including when a CLEC migrates its own or  
15 another CLEC's UNE-P customer to UNE-L, or when a UNE-L customer moves  
16 from one CLEC to another, or even when a CLEC UNE-L customer is won back  
17 to BellSouth. Many steps in the cutover process are manual, which inevitably  
18 leads to customer outages and other problems that occur only rarely with UNE-P  
19 migrations. In addition, carriers must exchange critical information with each  
20 other and third parties (for example the local number portability transaction), but  
21 the processes for doing so are far from seamless.

22 **Q. PLEASE DESCRIBE THE PROCESS THAT LED TO MCI'S LAUNCH OF**  
23 **LOCAL MASS MARKET SERVICE IN KENTUCKY.**

1    A.    That process was a long one, beginning with the passage of the  
2            Telecommunications Act of 1996 (“Act”).  Although the Act required BellSouth  
3            to unbundle its network, a number of battles had to be fought before MCI could  
4            launch its local consumer service in Kentucky.  First of all, CLECs had to  
5            establish the right to use UNE-P, which took several years and two U.S. Supreme  
6            Court decisions.  Second, the industry and the Commission undertook lengthy  
7            UNE pricing proceedings, in an effort to move UNE rates closer to the TELRIC  
8            standard required by the FCC.  Finally, major changes taking several years were  
9            required to modify BellSouth’s operations support systems (“OSS”) to make it  
10           feasible to order and provision service using UNE-P in the volumes required to  
11           serve mass market customers.

12                    UNE-L implementation will involve additional systems requirements and  
13           changes, including enhanced electronic provisioning processes to allow UNE-L  
14           orders to flow through BellSouth’s systems, processes to implement seamless  
15           CLEC-to-CLEC migrations at high volumes, and coordination with non-ILEC  
16           systems such as the NPAC and the ALI database provider to ensure that customer  
17           migrations are completed in a timely and correct manner.  Since outside  
18           organizations such as NPAC have not had to deal with mass markets customer  
19           migrations of the type seen with UNE-P, they are untested and potentially  
20           unready for these changes, making the process of curing impairment all the more  
21           difficult.

22    **Q.    WHEN DID MCI LAUNCH ITS LOCAL CONSUMER SERVICE AND**  
23    **WHAT HAS ITS EXPERIENCE BEEN?**



1 A. In April 2002 MCI launched “The Neighborhood built by MCI” in Kentucky and  
2 a number of other states. Since then, MCI has expanded its local footprint and  
3 now serves tens of thousands of UNE-P lines in Kentucky and more than 3.5  
4 million nationally. The Neighborhood, which uses UNE-P, provides Kentucky  
5 residential and small business consumers with packages of local, intraLATA and  
6 interLATA voice services, along with assortments of popular features.

7 **Q. DOES MCI PLAN TO MOVE ITS LOCAL RESIDENTIAL AND SMALL**  
8 **BUSINESS CUSTOMERS TO ITS OWN NETWORK?**

9 A. Yes, but only where it makes operational and economic sense to do so sense to do  
10 so. MCI currently is evaluating the use of UNE-L for its residential and small  
11 business customers. Once the problems with full-scale use of UNE-L described  
12 in my testimony and in MCI’s network operational testimony are corrected (and  
13 the economic issues addressed in MCI’s economic testimony are addressed), we  
14 can begin to make the transition from UNE-P to UNE-L. The timing and scope of  
15 the deployment will of necessity be limited not only by the resolution of  
16 operational and economic issues, but also by MCI’s collocation and switch  
17 footprint and availability.

18 **Q. WHY DOES MCI WANT TO TRANSITION CUSTOMERS FROM UNE-P**  
19 **TO UNE-L?**

20 A. There are at least two reasons. First, MCI, like any carrier, would prefer to  
21 provide service using its own network as much as possible because doing so  
22 would allow MCI both to use its state-of-the-art network and to promote further  
23 innovation of its products and services through further development and

1 deployment of new technology. Although UNE-P has been, and remains, critical  
2 to MCI being able to provide local residential and small business service in  
3 Kentucky, UNE-P requires MCI to rely on its chief competitor, BellSouth, for  
4 network services. To the extent it is economically and operationally viable to do  
5 so, MCI would prefer to use its own network via UNE-L, to provide service to its  
6 customers.

7 Second, MCI must take into account the changes taking place today in the  
8 telecommunications industry. Telecommunications is gradually moving from an  
9 industry controlled by large monopolies to one with multiple carriers offering  
10 multiple services to a dynamic customer base. The trend in the industry is toward  
11 bundled services and IP-centric offerings that enable consumers to select one  
12 carrier that meets all of their communications needs. As MCI begins to roll out its  
13 broadband services to consumers, it only makes sense to integrate its broadband  
14 facilities with its voice facilities. Eventually, when voice over internet protocol  
15 (“VoIP”) replaces traditional circuit switching as the technology of choice, it will  
16 be essential that MCI move off BellSouth’s circuit switches and onto its own  
17 facilities. MCI is planning for that future while serving its more than 3.5 million  
18 mass markets customers today.

19 **Q. WHERE WOULD MCI POTENTIALLY BE ABLE TO PROVIDE UNE-L**  
20 **SERVICE?**

21 A. UNE-L requires the CLEC to have its own switch and to be collocated in the  
22 BellSouth central office where the loops of the customers it wants to serve are  
23 terminated. MCI initially will be able to provide UNE-L service only in areas

1           where it already has deployed collocation equipment and local switches. MCI has  
2           been a facilities-based local exchange carrier in the large enterprise market for a  
3           number of years. MCImetro -- MCI's CLEC -- installed its first switch in 1995  
4           and since then has installed local switches, collocations in BellSouth central  
5           offices and fiber rings in major metropolitan areas throughout the country. MCI  
6           uses these facilities (along with leased high capacity loop facilities or their  
7           equivalent) to provide competitive local exchange service to business customers  
8           today. Moving to UNE-L would enable MCI to take advantage of those facilities.  
9           MCI will use its network wherever and whenever it makes operational and  
10          economic sense to do so instead of constantly having to rely on, and do battle  
11          with, BellSouth for the nondiscriminatory use and correct pricing of its network.  
12          But MCI can do this for mass markets customers only when it can ensure that  
13          those customers will continue to have the same seamless migration experience  
14          that its UNE-P customers have today.

15   **Q.   DOES MCI INTEND TO USE UNE-L EVERYWHERE IT HAS MASS-**  
16   **MARKET CUSTOMERS?**

17   A.   No. I can't imagine that would happen. For one thing, there are many areas and  
18          even entire states where MCI does not have any facilities. And it is highly  
19          unlikely that UNE-L will make economic and operational sense everywhere in  
20          every state, but that is an analysis that will be discussed in detail in the economic  
21          testimony being filed by MCI in this proceeding.

22   **Q.   WHAT IS THE SIGNIFICANCE TO THIS CASE OF MCI'S PLANS TO**  
23   **BEGIN TRANSITIONING CUSTOMERS TO UNE-L?**

1 A. MCI's review of the potential for moving to UNE-L illustrates the fundamental  
2 point of the *Triennial Review Order*<sup>1</sup>: MCI and other CLECs have every  
3 incentive to serve customers over their own networks, and will do so where and  
4 when it makes operational and economic sense. They do not need to be forced to  
5 do so. Once the operational and economic barriers have been brought down,  
6 CLECs will move freely to a UNE-L strategy, something they cannot do today.  
7 The success of that transition will be the best evidence that CLECs are no longer  
8 impaired without access to BellSouth switching.

9 **Q. WHAT WOULD HAPPEN IF COMPETITORS WERE REQUIRED TO**  
10 **MOVE TO UNE-L TODAY?**

11 A. There would be chaos and consumers would be the ones hurt. The UNE-L  
12 migration process today is manually intensive and cumbersome with multiple  
13 points of failure that could result in delay, inability to receive calls and, worse yet,  
14 loss of dial tone for the consumer. Customer migration problems could lead to  
15 customers being "stranded" on a carrier's network, unable to move anywhere else.  
16 These and other operational barriers prevent CLECs from being able to meet  
17 customer expectations. Thus, if the transition to UNE-L were made prematurely,  
18 the progress that has been made toward a dynamic, competitive  
19 telecommunications market since the passage of the Act would be destroyed.

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<sup>1</sup> See *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carrier*, CC Docket No. 01-338, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking FCC 03-36 (rel. Aug. 21, 2003) ("*Triennial Review Order*" or "*Order*").

1           For UNE-L to be an acceptable service delivery method, it must allow  
2 competitors to meet and even exceed customers' expectations. In particular,  
3 migrations between carriers using UNE-L must be seamless and the systems and  
4 processes of the entire industry – BellSouth, CLECs and third parties – must be  
5 fully functional and capable of working together effectively. Today these systems  
6 and processes are highly manual and are untested in a mass market environment.

7 **Q. ISN'T THE TRANSITION TO UNE-L SIMPLY A MATTER OF HOT**  
8 **CUTTING A LOOP FROM ONE LOCATION TO ANOTHER?**

9 A. No, moving to UNE-L is more than hot cutting loops from the BellSouth Main  
10 Distributing Frame (MDF) to MCI's collocation. It includes developing the  
11 processes and systems necessary to ensure that the customer's E911 service is not  
12 interrupted or the data rendered inaccurate, to "port" his number to his new carrier  
13 (and to a second carrier when that is requested), and to resolve problems when  
14 they arise. And it requires that this transition take place without harming that  
15 customer and without limiting his competitive choices.

16 **Q. HAS ANY CARRIER ATTEMPTED TO TRANSITION TO AND SERVE A**  
17 **LARGE MASS MARKET RESIDENTIAL CUSTOMER BASE USING**  
18 **UNE-L?**

19 A. No. No carrier has yet attempted a broad-scale facilities-based approach for  
20 residential mass markets customers. Because this will be a new experience for the  
21 industry, many of the problems that arise will have to be worked out for the first  
22 time, which will add to the difficulty of creating workable solutions. To use  
23 UNE-L, CLECs will need to interconnect their networks with BellSouth's

1 network in a much more integrated fashion than ever before. Beyond making the  
2 changes I describe below that are necessary to order and support UNE-L,  
3 “interconnection” in this sense also means that CLECs will need to physically  
4 connect their local networks with BellSouth’s local network and switches on a  
5 broad scale to get access to BellSouth’s loops to provide service to customers. It  
6 also will require capacity upgrades to MCI’s and other carriers’ E911 trunks and  
7 additional trunking to BellSouth’s tandem switches. For example, today a  
8 significant number of calls between BellSouth and CLEC customers in the same  
9 rate center are completed in BellSouth’s switch. Once customers are moved to  
10 UNE-L, however, these calls will need to route to the BellSouth tandem switch to  
11 be completed, potentially increasing the need for tandem switching capacity.  
12 MCI’s Network Impairment testimony describes these issues in greater detail.

13 **Q. WILL THE TRANSITION TO UNE-L INVOLVE MORE THAN SIMPLY**  
14 **MIGRATING MCI’S EXISTING UNE-P CUSTOMER BASE?**

15 A. Yes, definitely. The move to facilities-based competition is not simply about  
16 customers moving from UNE-P to UNE-L, or even from the incumbent monopoly  
17 to the CLEC. Customers also will move from one CLEC to another. Those  
18 CLECs may be UNE-L CLECs, UNE-P CLECs, resellers or cable companies.  
19 Today, customers return to BellSouth and migrate back and forth between UNE-P  
20 and resale CLECs on a daily basis. Some customers also try to migrate from  
21 facilities-based providers to UNE-P CLECs, but this process is almost completely  
22 manual and far from seamless. The key point here is that MCI’s move to  
23 facilities-based competition will not be limited to establishing and maintaining the

1 relationship between MCI and BellSouth; it involves the entire industry -- MCI,  
2 BellSouth, and every other CLEC offering service in the state. And in reality, it  
3 involves more than that. As I will discuss in greater detail later, the move to  
4 facilities-based competition will have implications for third parties that provide  
5 necessary but ancillary services, such as E911 providers and the LNP provider.

**Triennial Review Order**

7 **Q. DID THE FCC'S TRIENNIAL REVIEW ORDER RECOGNIZE THAT**  
8 **THERE ARE OPERATIONAL BARRIERS TO UNE-L?**

9 A. Yes. Although I am not a lawyer, I have reviewed the *Triennial Review Order*  
10 issued by the FCC with respect to the operational issues it addresses, and the FCC  
11 clearly recognized that operational barriers exist to UNE-L competition today.  
12 The FCC made a national finding of impairment with respect to unbundled local  
13 switching at the mass market level based on the existence of these operational  
14 barriers. (*Order* ¶ 419.) In essence, the FCC realized that competitors are  
15 currently unable to move to a UNE-L service delivery method with the processes  
16 and procedures that currently exist. Further, the FCC concluded that, for local  
17 competition to exist, competitors must have access to unbundled local switching  
18 until the existing operational and economic issues with UNE-L are fully  
19 identified, investigated and adequately resolved.

20 **Q. DID THESE OPERATIONAL BARRIERS LEAD TO THE FCC'S**  
21 **FINDING OF IMPAIRMENT WITH RESPECT TO MASS MARKET**  
22 **SWITCHING?**

1 A. Yes. In the *Triennial Review Order*, the FCC explicitly recognized the complex  
2 operational issues currently preventing UNE-L from being a viable local service  
3 delivery method and concluded that these issues were serious enough to find  
4 nationally that competitors are impaired without access to unbundled local  
5 switching. (*Order* ¶¶ 419, 456.) Unlike UNE-P migrations, in which the CLEC  
6 uses the same facilities as the ILEC in providing local service, UNE-L migrations  
7 are complicated by the necessity of physically moving the customer’s loop to the  
8 CLEC’s collocation equipment and from there routing the customer’s calls back  
9 to the CLEC’s switch. In addition, more data must be exchanged between local  
10 providers with UNE-L than is required with UNE-P. The FCC recognized that  
11 until these operational issues involving UNE-L are addressed and adequately  
12 resolved – that is, until migrations and service changes in a UNE-L environment  
13 are as seamless and trouble free as they are with long-distance and UNE-P – a  
14 transition to UNE-L would do nothing but harm competition and consumers.

15 The FCC concluded that the record before it evidenced a wide array of  
16 operational issues that prevent UNE-L from being a realistic local service delivery  
17 method at present. (*See, e.g., Order* ¶¶ 476-478.) As the FCC stated, competitive  
18 carriers may face barriers associated with loop provisioning that may impair their  
19 entry into the mass market. (*Order* ¶ 512.) The FCC asked the states to  
20 determine whether ILECs are providing nondiscriminatory access to unbundled  
21 loops. (*Order* ¶ 512.) In making this determination, the FCC requested the states  
22 to consider more granular evidence concerning the ILECs’ ability to transfer  
23 loops in a *timely and reliable* manner. (*Order* ¶ 512.) Accordingly, before UNE-



1 L can be an operational reality, it must be possible quickly, seamlessly and  
2 reliably to transfer loops from ILEC to CLEC as well as CLEC to CLEC and  
3 CLEC to ILEC – both as an operational necessity and to give customers the  
4 reliable, problem-free service they demand and expect.

5 **Q. THE FCC DISCUSSED THE “HOT CUT” PROCESS AT SOME**  
6 **LENGTH.**

7 A. Yes, and with good reason. The FCC noted that a “hot cut refers to a process  
8 requiring incumbent LEC technicians to disconnect manually the customer’s loop,  
9 which was hardwired to the incumbent LEC switch, and physically re-wire it to  
10 the competitive LEC switch, while simultaneously reassigning (*i.e.*, porting) the  
11 customer’s original telephone number from the incumbent LEC switch to the  
12 competitive LEC switch.” (*Order* ¶ 421 n.1294.) Hot cut problems listed by the  
13 FCC included “the associated non-recurring costs, the potential for disruption of  
14 service to the customer, and our conclusion, as demonstrated by our record, that  
15 incumbent LECs appear unable to handle the necessary volume of migrations to  
16 support competitive switching in the absence of unbundled switching.” (*Order*  
17 ¶ 421 n.1294.) The FCC explained that because of the manual, labor-intensive  
18 nature of the hot cut process, “hot cuts frequently lead to provisioning delays and  
19 service outages, and are often priced at rates that prohibit facilities-based  
20 competition for the mass market.” (*Order* ¶ 465.) In other words, the FCC  
21 concluded that the hot cut process posed a prohibitive barrier to UNE-L.

22 **Q. DID THE FCC DISCUSS THE IMPACT OF OPERATIONAL**  
23 **IMPAIRMENT ON CUSTOMERS IN ITS ORDER?**

1 A. Yes. In addition to discussing the technical aspect of these network operational  
2 issues, the FCC also explained how these operational issues negatively affect the  
3 customer's experience. The FCC noted that the delay that accompanies a UNE-L  
4 migration prevents competitors from providing service in a way that mass-market  
5 customers have come to expect. (*Order* ¶ 466.) For example, in Kentucky a  
6 BellSouth UNE-P migration takes about one business day, while migrating the  
7 same customer to UNE-L takes substantially longer, assuming BellSouth has the  
8 resources necessary to perform the cutover on the requested date. A UNE-L  
9 migration using today's hot cut process will always have the potential to harm a  
10 customer more than a UNE-P migration, because, as the FCC noted, "[f]rom the  
11 time the technician disconnects the subscribers loop until the competitor  
12 reestablishes service, the subscriber is without service." (*Order* ¶ 465 n.1409.)  
13 Similarly, the UNE-L process of "porting" the customer's number from the ILEC  
14 switch to the CLEC switch "also potentially subjects the customer to some period  
15 of time where incoming calls will not be received," because if the number is not  
16 ported properly, calls will not be routed to the customer's new number on the  
17 CLEC switch and the calling party will receive a message stating that the  
18 customer's number is no longer in service. This problem can be particularly  
19 significant when the customer has called 911 and the 911 operator attempts to call  
20 the customer back. In addition, customers will need to re-program customer  
21 initiated features like speed dialing and call forwarding after the cut is completed,  
22 adding another failure point to the process.

1           The FCC recognized that because “mass market customers generally  
2 demand reliable, easy-to-operate service and trouble-free installation,” such  
3 disruptions and delays negatively affect customers’ perceptions of the CLEC’s  
4 ability to provide service. (*Order* ¶ 467.) Indeed, the FCC found in the *Triennial*  
5 *Review Order* that customers experiencing such difficulties are likely to blame the  
6 CLEC, not the ILEC, even if the problem is caused by the ILEC. (*Order* ¶ 467.)  
7 Moreover, because customers view the ILEC as a baseline alternative to the  
8 CLEC for local service, customers’ negative perception of a CLEC’s service  
9 directly hampers a CLEC’s ability to win and retain customers. (*Order* ¶ 466.)

10 **Q. WHAT WAS THE FCC’S ULTIMATE CONCLUSION?**

11 A. The FCC found that CLECs are impaired nationally without access to the ILECs’  
12 unbundled local switching. The FCC recognized that numerous operational  
13 impediments make UNE-L currently infeasible, or, at most, possible only to a  
14 limited extent, and then only with a great risk of negative customer experience.  
15 Based on the FCC’s reasoning, these operational impediments must be identified  
16 and resolved before UNE-L can be considered a viable service delivery method.

17 **Customer Expectations**

18 **Q. HOW HAVE CHANGES IN THE TELECOMMUNICATIONS INDUSTRY**  
19 **AFFECTED CUSTOMERS’ EXPECTATIONS CONCERNING THEIR**  
20 **ABILITY TO MOVE FROM ONE CARRIER TO ANOTHER?**

21 A. Today’s telecommunications consumer is savvier than consumers of the past  
22 because of experience with long distance and local competition. Today’s  
23 consumer moves frequently between carriers and expects seamless migrations.

1 Carriers must be able to provide consumers with seamless and efficient migration  
2 between carriers, as well as timely repair and maintenance. If a carrier is unable  
3 to provide this high level of service to customers, it will not survive as a  
4 competitor.

5 **Q. HOW DOES THE LONG DISTANCE TRANSITION WORK TODAY?**

6 A. Migrations among carriers in the long distance market have set a benchmark for  
7 customers' expectations concerning migration among local providers. Through  
8 years of experience and expense, ILECs and interexchange carriers ("IXCs")  
9 developed the Primary Interexchange Carrier ("PIC") process, using the Customer  
10 Account Record Exchange Interface ("CARE") interface. It has taken more than  
11 fifteen years of PIC process improvements since CARE was introduced in 1988  
12 for transitions between long distance providers to be as smooth as they are today.  
13 For the majority of all such transactions, this process is completely automated –  
14 the order comes into the underlying service provider's computer system  
15 containing customer data, and if the order meets basic criteria, it flows through  
16 the system to the switch, where the PIC is changed, and then a confirmation  
17 message is sent directly to the new IXC. The entire process takes approximately  
18 twelve hours. Thus, because of a standard, automated process that was created  
19 through years of refinement and cooperation, transitioning between long distance  
20 providers is the quick and relatively problem-free process that customers have  
21 come to expect.

22 **Q. IS THERE A SIMILAR EXPERIENCE TODAY IN THE LOCAL**  
23 **SERVICE ARENA?**

1 A. Yes, for most customers, UNE-P transitions are also relatively seamless. CLECs  
2 and BellSouth have worked together since the passage of the Act to develop an  
3 automated process for the smooth migration to UNE-P of retail, resale, and  
4 CLEC-served UNE-P local voice customers. Today, the customer does not know  
5 that the process is occurring until it is completed and the new carrier's features  
6 and functionalities, such as voice mail, appear on his line. Since BellSouth no  
7 longer issues disconnect and new orders for UNE-P migrations, only rarely is  
8 there loss of dial tone, the need for coordination between BellSouth and the  
9 CLEC, or manual intervention at the central office MDF. Rather, just as in the  
10 long distance world, the CLEC sends an automated request to BellSouth for the  
11 migration of the new CLEC customer, and the change is made. In this way, the  
12 UNE-P process is quite similar to the CARE long distance process, and is indeed  
13 no different from the customer's experience in changing features of its BellSouth  
14 service without changing providers. As a result of the industry efforts concerning  
15 UNE-P, millions of customers have been migrated successfully from BellSouth to  
16 UNE-P CLECs, and from one UNE-P CLEC to another UNE-P CLEC, with no  
17 loss of dial tone and no need for central-office-based installation and maintenance  
18 support.

19 **Q. CAN YOU PROVIDE A MORE DETAILED DESCRIPTION OF THE**  
20 **UNE-P MIGRATION PROCESS?**

21 A. Yes. The process of migrating a BellSouth customer to CLEC UNE-P service  
22 proceeds is outlined in Exhibit SL-1.

1   **Q.    HOW LONG DOES THE UNE-P MIGRATION PROCESS GENERALLY**  
2   **TAKE?**

3   A.    The entire retail-to-UNE-P migration process is typically completed within one  
4   business day, regardless of the features ordered. CLECs can send and receive  
5   large numbers of transactions (including migrations, disconnections, and feature  
6   changes) per hour, because the process is almost wholly electronic. And these  
7   transactions can be completed on the same day, without the need to negotiate with  
8   a project manager or schedule work times. Most importantly, just like a long  
9   distance PIC change, the UNE-P migration process is relatively seamless to the  
10  customer and allows customers to change carriers whenever they wish.

11  **Q.    IS IT IMPORTANT THAT CUSTOMERS BE ABLE TO CHANGE**  
12  **PROVIDERS RAPIDLY AND SEAMLESSLY?**

13  A.    Yes, as noted above, today's consumer changes carriers more frequently than  
14  consumers of the past and expects to be able to do so in an efficient and timely  
15  manner. In the telecommunications industry, this movement of customers to and  
16  from carriers is commonly referred to as "churn." Churn generally describes the  
17  behavior of customers as they move not just from BellSouth to a CLEC but also  
18  from a CLEC to BellSouth and from a CLEC to another CLEC. Today,  
19  migrations between CLECs that use UNE-L (for example, from UNE-P CLEC 1  
20  to UNE-L CLEC 2 or from UNE-L CLEC 1 to UNE-L CLEC 2) are not seamless,  
21  quick or efficient; indeed, they usually take extended periods of time and often  
22  fail. Without a simple and seamless method to transfer customers between  
23  providers using different facilities-based service delivery methods, customers may

1           become “stuck” and unable to exercise their choice to leave one carrier and  
2           migrate to another.

3   **Q.    IS CHURN A BAD THING OR A GOOD THING?**

4   A.    It is really both. Churn is a good thing for consumers, because it allows them to  
5           try new products and services from varying providers. Such consumer movement  
6           encourages carriers to innovate and become more efficient, and, in turn, rewards  
7           that innovation and efficiency. In a very real sense, churn is the proof that the  
8           competitive process is working. Although good for consumers, churn is  
9           problematic for industry players: not only is it expensive when consumers pick a  
10          provider for only a short period of time and then leave for another provider, but  
11          churn also complicates both the record keeping and billing processes that  
12          accompany acquiring and losing a customer for both the acquiring carrier and the  
13          underlying network service provider. However, competitors realize that churn –  
14          the customer’s ability to move amongst providers quickly and efficiently – is a  
15          necessary and integral part of a competitive telecommunications landscape.  
16          Consumers cannot be “locked in” to a single provider or “stranded” on a single  
17          service delivery platform. They must be able to make choices and migrate among  
18          providers at will.

19   **Q.    IS THERE A LOT OF CHURN IN THE INDUSTRY TODAY?**

20   A.    Yes, as I discussed above, customers are more educated and savvy today and  
21          move more frequently among carriers to get better service packages. Churn rates  
22          today are fairly high in the telecommunications industry, in both long distance  
23          and UNE-P local markets. These high churn rates have been enabled by

1 regulatory requirements and changes in the OSS of the carriers. Specifically,  
2 equal access in the long distance arena, and UNE-P and electronic order  
3 processing in the local service arena, have facilitated customer migrations and  
4 permitted churn to exist and accelerate.

5 **Operational Impairment**

6 **Q. ARE THERE UNE-L PROVIDERS SERVING MASS MARKET**  
7 **CUSTOMERS ON A BROAD SCALE TODAY?**

8 A. No. There are virtually no UNE-L providers from which mass markets (and  
9 particularly residential) customers can choose, and those providers that do exist  
10 provide service in limited areas and support a limited range of customers.

11 **Q. WHY NOT?**

12 A. There are a number of economic and operational reasons. One of the operational  
13 reasons is that a migration to and from the UNE-L service delivery method is  
14 anything but simple. The systems and processes involved in a UNE-L migration,  
15 as opposed to a UNE-P migration, are complex, manually intensive and  
16 cumbersome.

17 **Q. WHAT MAKES THE UNE-L MIGRATION PROCESS SO COMPLEX?**

18 A. Unlike UNE-P, UNE-L requires a physical change to the facilities involved in  
19 providing service to the customer because the loop serving the customer must be  
20 physically disconnected from the BellSouth retail or CLEC UNE-P facilities and  
21 then connected to the UNE-L carrier's facilities in the BellSouth central office.  
22 Moreover, UNE-L requires an unprecedented exchange of information between  
23 the multiple parties involved, including providers not generally involved in the



1 processes reviewed and tested by the Commission. The process flow shown in  
2 Exhibit SL-2 illustrates the pre-ordering, ordering, provisioning, maintenance and  
3 repair and billing steps involved in a typical BellSouth retail to CLEC UNE-L  
4 migration. The migration process is described in narrative terms in Exhibit SL-3.

5 **Q. ARE THERE COMPLEXITIES THAT THE DIAGRAM IN EXHIBIT SL-2**  
6 **DOES NOT INCLUDE?**

7 A. Yes, while this process flow outlines the steps in a typical BellSouth retail to  
8 CLEC UNE-L migration, there are several things that it simply cannot illustrate  
9 adequately: (1) at numerous points in this process, manual handling of the UNE-  
10 L migration tasks is required, often resulting in errors and delay; (2) UNE-L flow  
11 through rates are lower than that of UNE-P, causing still more manual work and,  
12 hence, more delay; (3) there is a significant amount of information that must be  
13 exchanged among various parties to the migration, and the failure of this  
14 information to reach its destination in a timely and accurate manner could  
15 significantly affect a customer's service; and (4) the scalability of this process to  
16 meet mass-market volumes is doubtful and untested because loops have never  
17 been migrated at mass market volumes at this time. All four of these issues  
18 individually or in combination if left unresolved have the potential to derail a  
19 competitor's ability to utilize UNE-L to serve mass-market customers.

20 **Q. IS THE UNE-L MIGRATION PROCESS READY FOR MASS-MARKET**  
21 **USE?**

22 A. Absolutely not. If carriers move from a UNE-P to a UNE-L service delivery  
23 method before the processes and procedures are in place to allow migrations to

1 take place quickly and efficiently, the churn that is a trademark of competition in  
2 the long distance and UNE-P markets will create significant problems both for  
3 carriers and customers. Without seamless and efficient migration processes in all  
4 directions and among all carriers, customers' attempts to migrate away from their  
5 existing carriers could overwhelm the ability of carriers to accommodate those  
6 moves. The result could be that customers are in effect held hostage to  
7 cumbersome untested processes that cannot support the volume of orders being  
8 issued.

9 In addition, the description and process flow discussed above only outlines  
10 the retail to CLEC UNE-L migration. This migration is only one of several  
11 migration scenarios that CLECs will encounter in a dynamic competitive UNE-L  
12 market. The core scenarios (as seen from MCI's perspective) include the  
13 following:

- 14 • Retail to MCI UNE-L migration
- 15 • MCI UNE-P to MCI UNE-L conversion (the "batch" conversion process)
- 16 • CLEC UNE-P to MCI UNE-L migration
- 17 • CLEC UNE-L to MCI UNE-L migration
- 18 • MCI UNE-L to BellSouth retail migration
- 19 • BellSouth retail DSL customer (line sharing or FastAccess) to MCI line  
20 splitting via UNE-L
- 21 • Line-splitting UNE-P CLEC to MCI UNE-L line splitting (voice and data)  
22 migration

1           This list is by no means exhaustive, but illustrates the kinds of migrations  
2           that carriers will need to be able to process on a regular basis. The sheer number  
3           of scenarios that must be handled gives some indication of the complexity that  
4           moving to UNE-L will entail. Moreover, many of these scenarios involve greater  
5           complexity than the retail-to-MCI migration, because some involve additional  
6           parties and some involve DSL service. MCI has attached these core migration  
7           process flows to this testimony as Exhibit SL-4. Included in these process flows  
8           are numbered points in the process where potential challenges may well exist as  
9           well as a glossary of relevant acronyms.

10   **Q.   PLEASE GIVE SOME EXAMPLES OF THE COORDINATION**  
11   **BETWEEN THE CLEC, BELLSOUTH AND THE CUSTOMER THAT IS**  
12   **REQUIRED TO EFFECT A UNE-L MIGRATION.**

13   A.   A cutover from BellSouth to a UNE-L CLEC requires coordination between the  
14   CLEC and BellSouth to request the physical movement of the loop, to test the  
15   loop once it has been moved, and to create and issue the E911, and LNP  
16   transactions. Moreover, if a customer is served by IDLC, a dispatch to the remote  
17   terminal or even the customer premise may be required. The highly manual  
18   nature of the hot cut itself (*i.e.*, the lifting and laying of the loop) is presumably  
19   the reason that BellSouth has included a project manager in its batch hot cut  
20   proposal; a skilled manager is needed to coordinate the many manual activities  
21   (including the scheduling of the individual hot cuts) involved in the hot cut  
22   process. In all migrations, the customer will need to participate, too, by  
23   reprogramming features such as speed dial or variable call forwarding and

1           perhaps remaining at home for a technician visit to connect the new loop and  
2           potentially to make changes to the inside wire termination at the NID.

3   **Q.    IS MOVING BETWEEN CLECS ALSO DIFFICULT?**

4   A.    Yes. Once a customer is on a loop, the process of moving between CLECs  
5           becomes more complicated because BellSouth no longer has a record of the  
6           customer in its systems.

7   **Q.    PLEASE DESCRIBE THE COORDINATION THAT IS REQUIRED**  
8           **BETWEEN CLECS TO EFFECT A UNE-L CLEC-TO-CLEC**  
9           **MIGRATION.**

10  A.    A CLEC-to-CLEC migration requires the winning and losing CLEC to cooperate  
11           to provide the information necessary to reuse the customer's existing facility (the  
12           loop) while notifying all the switches in the worldwide network that the  
13           customer's telephone number has moved from one carrier to another. And both  
14           the winning and the losing CLEC have to work with BellSouth to coordinate the  
15           movement of the customer's loop from one collocation cage to another. The  
16           winning CLEC has to work with the losing CLEC to select a date for the  
17           migration and they have to ensure that the losing CLEC's "port out" request to  
18           BellSouth will "mate" with the winning CLEC's migration request. If the port out  
19           request is rejected, the CLECs must negotiate a new due date and start all over  
20           again.

21  **Q.    WHAT NEEDS TO BE DONE TO ADDRESS THE ISSUES OF MANUAL**  
22           **PROCESSING AND MULTIPLE PARTY COORDINATION?**

1 A. MCI recommends that these issues be addressed in commission-sponsored  
2 industry workshops. Other recommendations are made in MCI's network  
3 operational testimony.

4 **Q. DO YOU EXPECT THERE ARE OTHER OPERATIONAL BARRIERS**  
5 **THAT EXIST FOR UNE-L THAT MCI HAS NOT YET DISCOVERED?**

6 A. Yes. As with the development of UNE-P, operational issues will emerge as  
7 carriers develop their systems to process UNE-L ordering and provisioning.  
8 Today, I am only discussing issues that I am aware of as of the time of this filing.  
9 Many new issues can be expected to arise as carriers move toward UNE-L  
10 service, and the industry and the Commission will need to address those problems  
11 during the process of removing operational barriers to UNE-L.

12 **Q. YOU ALSO MENTIONED OPERATIONAL ISSUES RELATING TO**  
13 **INFORMATION EXCHANGE. PLEASE EXPLAIN WHAT YOU MEAN**  
14 **BY THAT.**

15 A. There are multiple points where there are changes to customer records and  
16 information in both internal and external databases that are required for migration  
17 to a UNE-L service delivery method. Many of these changes result from the fact  
18 that the CLEC switch will be used in the provision of service with UNE-L versus  
19 the BellSouth switch that is used with UNE-P. Because there is very little mass  
20 market UNE-L competition today there are a great many unanswered questions  
21 surrounding these transfers and information exchanges. These exchanges of  
22 information all represent potential points of failure with UNE-L. These

1 coordination, database, and ordering issues represent operational barriers that are  
2 of critical importance to both the customer and the service provider.

3 I will describe information exchange issues involving databases relating to  
4 CSRs, LFACS, E911, NPAC, LIDB, CNAM, DL/DA and printed directories.  
5 Changes to these databases must take place as efficiently and seamlessly as  
6 possible in every UNE-L scenario. In addition, I will discuss the changes to  
7 trouble handling that must take place before UNE-L customers can expect the  
8 level of repair service to match that of UNE-P. After outlining these issues, I also  
9 will discuss approaches MCI recommends for addressing them, which should  
10 provide at least a starting point for resolution.

11 **Q. PLEASE EXPLAIN THE CSR ISSUE.**

12 A. Obtaining accurate and complete customer information is essential to a CLEC's  
13 ability to submit a valid order. CSRs are used to identify address, feature,  
14 directory and other information for migrating customers. CSRs show the most  
15 current customer configuration based on the switch port and the current carrier's  
16 internal billing systems. During the pre-order phase of a migration, the CLEC  
17 representative needs to obtain current customer and service information to create  
18 the order. While this information can be retrieved on a real time basis for  
19 BellSouth retail customers (and some UNE-P CLEC customers), the systems and  
20 processes required to obtain and share this information have not been developed  
21 for all migration scenarios, most notably CLEC-to-CLEC migrations.

22 **Q. IS THIS AN ISSUE FOR INITIAL MIGRATIONS FROM BELL SOUTH?**

1 A. No. This is not an issue in initial migrations from BellSouth because BellSouth  
2 now allows UNE-P customers to be migrated by telephone number and house  
3 number, both of which are contained in BellSouth's CSRs.

4 **Q. IS THIS PROCESS THE SAME WITH ALL MIGRATIONS?**

5 A. No. Obtaining this type of customer information becomes much more difficult in  
6 a CLEC UNE-L-to-CLEC UNE-L migration because BellSouth no longer has the  
7 current customer configuration information. Although the participants in a  
8 Florida collaborative have agreed to a 48 hour timeframe for exchanging CSR  
9 data, there is no way to ensure that this timeframe is met, and numerous problems  
10 with the process still exist. For example, the "winning" CLEC must contact the  
11 "losing" CLEC by e-mail, fax, through a web site, or most often, by telephone, to  
12 obtain the relevant information. Obtaining information by telephone is not only  
13 manually intensive, but is made all the more difficult because there is no complete  
14 list of who and when to call. The manual nature of the process means it takes a  
15 long time (as opposed to instantaneous transmission for UNE-P) and has a greater  
16 margin for error because as yet, there are no CLEC CSR standards for database  
17 integrity. MCI's small business team has had significant problems in obtaining  
18 CSRs from a number of the CLECs active in the BellSouth territory. To make  
19 matters worse, each carrier's CSR looks different and must be interpreted  
20 differently, which gives rise to miscommunication.

21 **Q. IS MORE INFORMATION REQUIRED FOR UNE-L MIGRATIONS**  
22 **THAN CLECS CURRENTLY PROVIDE TO EACH OTHER?**

1 A. Yes. Once the customer has migrated to a UNE-L CLEC, additional information  
2 is required to effect a subsequent customer move. For example, the carrier to  
3 whom the customer is migrating needs the customer's "circuit ID," which will be  
4 used by BellSouth to track where the customer exists on the main distribution  
5 frame of BellSouth's switch. The circuit ID generally is not included in the CSR,  
6 but rather is passed to the first UNE-L CLEC when BellSouth returns a firm order  
7 confirmation. The circuit ID is critical, since the winning CLEC will need that  
8 information to ensure that the same physical loop can be used to serve the  
9 customer, and BellSouth needs the circuit ID to provision the customer's existing  
10 loop to the winning CLEC, rather than having to find and provision another loop  
11 that its systems show to be available. Because all of the information needed for  
12 UNE-L migrations is not readily available – either because BellSouth no longer  
13 maintains it or the losing CLEC refuses to provide it, or because there are not  
14 reliable, comprehensive systems for transferring this information among CLECs –  
15 a new pre-order processes, including a new method of obtaining CSRs from all  
16 industry players must be developed for UNE-L.

17 **Q. WHAT CSR INFORMATION DOES MCI REQUEST BE INCLUDED?**

18 A. MCI needs the customer's billing telephone number; working telephone number;  
19 billing name and address; directory listing information (including listing type);  
20 complete service address; current PICs (for both inter and intraLATA, including  
21 freeze status); local freeze status, if applicable; all vertical features; options (such  
22 as toll blocking and remote call forwarding); tracking or transaction number;  
23 service configuration information (*i.e.*, whether customer is served via resale,



1           UNE-P, UNE-L, etc.); the identification of the network service provider, and the  
2           identification of any line sharing or line splitting on the line; the BellSouth feature  
3           name and USOC for vertical features and blocking options to ensure that CLECs  
4           can understand each other's CSRs; circuit ID information; and identification of  
5           line sharing/line splitting providers. Currently, some CLECs are not providing  
6           any CSR information, while in other cases the information is provided slowly.  
7           Some CLECs that provide CSR information do not include all the customer's  
8           features or the customer's circuit ID, or do not provide an accurate circuit ID.

9           **Q.    DO THESE CSR ISSUES AFFECT A CUSTOMER'S ABILITY TO**  
10           **MIGRATE BETWEEN UNE-L CLECS?**

11          A.    Yes. This CSR issue must be addressed and the infrastructure developed prior to  
12           the implementation of UNE-L. Otherwise, customers will be stuck where they  
13           land in their first migration or BellSouth will be forced to install more and more  
14           facilities to compensate for the inability to identify the current circuit being used.

15          **Q.    DOES MCI HAVE A PROPOSAL TO RESOLVE THESE CSR ISSUES?**

16          A.    Yes. MCI proposes the establishment of a distributed CSR retrieval system,  
17           similar to the CARE Clearinghouse, which would be used by CLECs and  
18           BellSouth alike to route requests for CSR information to the customer's current  
19           carrier. The ability to obtain a CSR, including circuit ID information, from all  
20           CLECs will be necessary before UNE-L migrations can be handled on the same  
21           basis as UNE-P migrations.

22          **Q.    PLEASE EXPLAIN THE DISTRIBUTED DATABASE CONCEPT IN**  
23           **MORE DETAIL.**

1 A. MCI recommends that a central clearinghouse be established to identify the owner  
2 of a particular customer and to forward queries to the current provider to retrieve  
3 that customer's service information. The clearinghouse would serve as a hub for  
4 CSR requests, directing them to the proper providers following a single data  
5 communications protocol. CLECs would maintain CSRs in a standard format and  
6 would agree to standard delivery methods and time frames. CLECs could also  
7 establish direct communications between each other if the volume of requests  
8 warranted it. Companies that did not want to maintain their own CSRs or could  
9 not develop the software necessary to electronically transmit that information to  
10 the clearinghouse could contract with third party vendors (or even BellSouth) to  
11 support this process. State commissions would need to develop standards and  
12 procedures to ensure that information was exchanged within the appropriate time  
13 frames.

14 **Q. WHAT CAN BELLSOUTH DO TO SUPPORT THE CLEC TO CLEC**  
15 **MIGRATION PROCESS NOW?**

16 A. BellSouth currently allows CLECs who have agreed to view each other's UNE-P  
17 CSRs to do so via the LENS GUI. MCI has issued a change request to BellSouth  
18 to allow these CSRs to be provided via EDI. BellSouth should implement this  
19 change request immediately and, in addition, should remove the requirement that  
20 CLECs contract with each other in order to take advantage of this functionality.  
21 In addition, until a CSR Clearinghouse is developed BellSouth should modify its  
22 CSR databases to continue to provide access to the underlying information about

1 customers and their service remaining with BellSouth after a customer has  
2 migrated to UNE-L, as has been recommended in the Florida collaborative.

3 **Q. WHY IS LFACS IMPORTANT?**

4 A. Before migrating a customer to UNE-L, MCI must determine whether that  
5 customer is served by IDLC. MCI does this by submitting a loop make-up  
6 inquiry to LFACS. The accuracy of the data retrieved from this database is  
7 critical to the CLEC's ability to determine if it can serve the customer,  
8 particularly for combined voice and data offerings (DSL). For example, the  
9 CLEC needs to know if the customer's loop is copper (and can be unbundled) or  
10 is served through an IDLC system, or whether the customer has fiber to the home.  
11 BellSouth will select one of eight unbundling methods for customers served by  
12 IDLC and will not unbundle fiber to the home, so this pre-order information is  
13 critical in determining whether the customer can be migrated to a CLEC's switch.  
14 It is also critical in determining whether customers may obtain DSL after their  
15 migration.

16 **Q. IS THE DATA CONTAINED IN LFACS ACCURATE?**

17 A. At this point we do not know. Given the current low level of UNE-L and DSL  
18 competition, it is difficult to know how inaccurate LFACS data is, despite testing  
19 done during the 271 process. More importantly, as churn continues and more  
20 customers are migrated to UNE-L, won back by the ILEC, and then migrated to  
21 other companies, the quality of this database may degrade.

22 **Q. HOW DOES MCI PROPOSE TO RESOLVE THIS ISSUE?**

1 A. MCI proposes a process be developed to ensure that updates to LFACS are made  
2 on a real-time basis so that this database remains up to date as BellSouth alters or  
3 changes its loop plant. This is particularly important as BellSouth takes down its  
4 copper plant and replaces it with fiber. On-going audits of LFACS will also be  
5 necessary to ensure that the accuracy of this important information source does  
6 not degrade.

7 **Q. HOW IS UNE-L TROUBLE HANDLING DIFFERENT THAN TROUBLE**  
8 **HANDLING FOR UNE-P CUSTOMERS?**

9 A. Since UNE-P is provided by combining existing elements of the BellSouth  
10 network, customer network issues can be resolved in the same way for a UNE-P  
11 customer as they are for a BellSouth retail customer. The CLEC uses the  
12 BellSouth Mechanized Loop Test (MLT) to identify the trouble and dispatch the  
13 required repair personnel. When a customer moves to UNE-L, his service is  
14 provided as three separate components – the BellSouth loop, the CLEC  
15 collocation equipment, and the CLEC switch. CLECs will need to isolate the  
16 trouble to the company responsible for its repair and then dispatch two separate  
17 repair forces (CLEC resources to repair their switches and collocation equipment  
18 and BellSouth forces to repair the loop or NID) before the customer’s service can  
19 be restored. This will take additional time that may impact customer service.

20 In a UNE-L environment, MCI representatives gather the appropriate  
21 information from the customer and make an initial trouble assessment. To do  
22 this, MCI must “sectionalize” the trouble and determine whether a dispatch to the  
23 MCI switch, a dispatch to the MCI collocation, a dispatch to the BellSouth MDF,

1 or a dispatch out to the field is required. If the problem is in MCI's portion of the  
2 network, MCI either must dispatch a technician to its collocation cage or work  
3 with BellSouth to clear the problem. If no trouble is found on MCI's network,  
4 typically MCI will request BellSouth to determine if the problem is with  
5 BellSouth's network. If no trouble is found after a "dispatch in" to BellSouth, the  
6 initial ticket may be closed and MCI may have to open a new ticket if it turns out  
7 the problem lies at the MDF or the facility running from the frame to MCI's  
8 collocation space. This process thus can lead to increased out of service times  
9 and harm customers by putting them in the middle of "finger pointing" exercises.

10 **Q. WHY IS THIS AN ISSUE?**

11 A. Since few mass markets customers today have UNE-L service, this trouble  
12 handling process has not yet been adapted for a world where customer service  
13 outages must be repaired rapidly so that residential customers can continue to be  
14 able to receive dial tone at the same rates as BellSouth customers.

15 **Q. HOW DOES MCI PROPOSE TO HANDLE THIS ISSUE?**

16 A. For trouble handling in a UNE-L environment to work properly, CLECs like MCI  
17 need to obtain newer and more advanced test equipment as well as to develop  
18 internal processes to address this trouble handling and the anticipated volumes. In  
19 addition, all parties need to make sure that the dispatch rules surrounding trouble  
20 handling are adequate, function properly and are scaled to mass market volumes.  
21 These kinds of issues lend themselves to a workshop process under Commission  
22 supervision, along the lines I already have discussed.

1 **Q. WHEN A CUSTOMER MIGRATES TO UNE-L ARE THERE CHANGES**  
2 **INVOLVING A CUSTOMER’S E911 INFORMATION?**

3 A. Yes. When a consumer migrates to a UNE-L CLEC, the 911 database must be  
4 updated to reflect the new switching provider. A customer’s migration to a UNE-  
5 L CLEC requires BellSouth to “unlock” the E911 database, allowing the CLEC  
6 record to overlay the existing BellSouth record with updated information,  
7 including the CLEC company code and 7x24 emergency number as well as the  
8 current customer address information if necessary.

9 **Q. WHAT HAPPENS IF THE CHANGE IS NOT MADE CORRECTLY?**

10 A. If this change is not made correctly, the customer’s E911 information in the  
11 Automatic Line Identification (“ALI”) database will not include the CLEC’s  
12 company ID or the customer’s correct address if the customer has moved or the  
13 record required some other correction. It is essential that this change to E911 be  
14 done correctly and also that it be seamless and transparent to the migrating  
15 consumer.

16 **Q. IS THIS CHANGE REQUIRED FOR UNE-P?**

17 A. No such change is required for UNE-P because BellSouth retains control over the  
18 911-database information for the UNE-P CLEC and continues to provide trap and  
19 trace and law enforcement and health and safety functions. Because there is no  
20 change to the E911 database, there is little if any chance for errors to be  
21 introduced and no additional data requirements for the Public Safety Answering  
22 Position (“PSAP”) administrators.

1   **Q.    COULD YOU EXPLAIN THE NECESSARY E911 CHANGE IN MORE**  
2   **DETAIL?**

3   A.    BellSouth in most cases maintains the 911 selective router used for routing a 911  
4   call to the appropriate PSAP. The PSAP dips into the ALI database when a 911  
5   call is received to retrieve the address of the caller. The PSAP is the custodian of  
6   the data required to dispatch emergency personnel. The PSAP must have a record  
7   for each customer a facilities CLEC has and must be able to contact that carrier.  
8   Thus, in a UNE-L environment, there are two orders required for changes to the  
9   911 ALI database. One order must go from BellSouth to the 911 provider to  
10   unlock the record in the ALI database. This allows the CLEC to overlay the  
11   existing record with the updated 911 ALI record, once the migration has been  
12   successfully processed.

13           The second order must go through the CLEC's vendor (or BellSouth if the  
14   CLEC has contracted with it) to overlay the existing 911 record with the new  
15   record. It is essential that these orders are coordinated so that the BellSouth  
16   “unlock” order arrives before the CLEC “create” order to newly populate the  
17   database.

18           A critical issue here is the timing of the “unlock” order. BellSouth sends  
19   the 911 “unlock” order after the UNE-L work order has been closed in the  
20   provisioning system (WFA). The CLEC receives the closure information via an  
21   email or fax from the BellSouth EnDI system or via a telephone call if it chooses  
22   the costlier coordinated hot cut option. If this notifier is delayed or lost, the  
23   CLEC will not know that the loop order has completed, which may delay its E911

1 and LNP transactions. Because there will necessarily be a time lag where the 911  
2 system has incorrect information on the network service provider, customers or  
3 law enforcement personnel who request a “trap and trace” on the line will be  
4 delayed until the proper service provider is identified. BellSouth should also  
5 provide CLECs with insight into the EnDI system and develop new metrics to  
6 measure its availability and to ensure that it has limited out of service time.

7 MCI understands that BellSouth now plans to address the notification  
8 problem by providing an on-line tracking system similar to that provided by  
9 Verizon and proposed by SBC to provide real time notification of order status, but  
10 this proposal is still in the “planning stage” and must be reviewed by CLECs  
11 before they can determine whether it solves the 911 and LNP problems.

12 **Q. WHAT HAPPENS IF THE ORDERS ARE NOT SEQUENCED**  
13 **CORRECTLY?**

14 A. If the sequence of the orders is disrupted, the 911 database cannot be updated.  
15 While the customer will be able to dial 911, the PSAP will only see the old  
16 customer record, which may or may not be accurate and will contain the wrong  
17 company ID for correction or trap and trace requests or the wrong address if the  
18 customer has moved and then obtained UNE-L service from a CLEC. As the  
19 number of UNE-L orders increases and particularly during the bulk transition of  
20 customers from UNE-P to UNE-L, the problem will become more severe. In  
21 addition, the CLEC will be required to check the PSAP information manually to  
22 determine if the update has been accepted and has passed the myriad of required  
23 edits.



1 **Q. HOW SHOULD THIS PROBLEM BE FIXED?**

2 A. MCI suggests that these issues be addressed through a workshop process under  
3 the Commission's supervision. As operational barriers to UNE-L are overcome  
4 and CLECs transition to that service delivery method, it will be essential to ensure  
5 that the required 911 data are accurate as well as seamless and transparent to the  
6 consumer. In addition, the Commission, BellSouth, and the CLECs should work  
7 with the 911 database providers to improve the error handling capabilities of the  
8 system. Currently, 911 errors are returned to CLECs in batch files rather than in  
9 real time. This increases the potential for late or inaccurate updates to the  
10 database.

11 **Q. ARE THERE ISSUES INVOLVING NPAC IN A UNE-L MIGRATION?**

12 A. Yes. NPAC handles the data base updates necessary to determine the "home  
13 switch" for each UNE-L customer -- that is, the switch that provides the customer  
14 with dial tone.

15 **Q. ARE NPAC CHANGES NECESSARY WITH UNE-P?**

16 A. No. Since UNE-P uses BellSouth switching, there is no need to send transactions  
17 for UNE-P migrations to the NPAC, keeping the number administration task to a  
18 manageable level. When CLECs move to UNE-L, however, such transactions  
19 become a necessary and integral part of the process -- and one that is currently  
20 untested at mass-market volumes.

21 **Q. PLEASE EXPLAIN.**

22 A. When a customer migrates to UNE-L, a transaction must be sent to NPAC to  
23 identify the "destination" switch for calls to this number. BellSouth initiates this

1 transaction by creating a “10 digit trigger” in the donor (losing) switch at the time  
2 the UNE-L order is created. The trigger will cause incoming calls to “dip” into  
3 the NPAC database to determine the switch that now houses the number. The  
4 CLEC initiates the second step of this process when it receives notification from  
5 BellSouth that the cut has been completed. The CLEC then sends a transaction to  
6 NPAC to claim the number. Until the CLEC claims the number in the NPAC  
7 database, the customer will be unable to receive any incoming telephone calls.  
8 Thus, while a customer will be able to call 911 before the porting activity is  
9 complete, he or she will not be able to receive a call back until the transaction is  
10 sent and the number is distributed to all the switches in the network. If the NPAC  
11 transaction is not completed successfully -- for example, if the NPAC system is  
12 down, the request is formatted incorrectly, one of the switches in the network is  
13 slow to or unable to update, or BellSouth has not notified the CLEC that the cut is  
14 complete -- the customer will not be able to receive calls or voice mail messages,  
15 since calls will be directed to the incorrect home switch. Incoming callers will  
16 hear a message stating that the line has been disconnected, leading to more  
17 confusion and problems. It is essential that the NPAC process be coordinated and  
18 successful. If it is not, consumers could experience service problems that do not  
19 exist today with UNE-P.

20 The LNP process becomes even more complicated when a UNE-L  
21 customer migrates to a second CLEC. When the customer changes carriers again,  
22 the losing carrier must “unlock” the existing record to allow the winning carrier to  
23 “replace” it with its destination code. Both churn and the addition of the ability

1 for customers to migrate their numbers between wireless carriers and from  
2 wireline to wireless carriers will raise the number of transactions processed by the  
3 NPAC tremendously. It is unclear whether NPAC will be able to handle the  
4 volumes of transactions that would occur in a dynamic UNE-L market. In  
5 addition, the error checking rules for the NPAC are unclear and must be tested to  
6 ensure that the correct numbers are ported. If NPAC cannot handle the volumes  
7 or error rates are significant, changes to the NPAC process will undoubtedly  
8 prove necessary.

9 The current experience of customers trying to port their number between  
10 wireless carriers provides a good example of the problems that are occurring in  
11 the local number portability process. The number portability problems are  
12 causing many customers to carry two telephones, one from their new provider and  
13 one from their old provider, to ensure that they will continue to receive calls.  
14 While this is merely inconvenient to wireless customers (and more expensive than  
15 necessary) customers can still receive calls directed to their number. With  
16 wireline local number portability, customers would have no work-around to  
17 receive calls until the number was properly ported over to the carrier providing  
18 dial tone via a UNE-L loop to the residence.

19 **Q. DOES MCI HAVE ANY SUGGESTED RESOLUTION TO THIS ISSUE?**

20 A. Yes. MCI recommends that the Commission address this issue in a workshop  
21 with BellSouth, CLECs, the NPAC administrator (Neustar) and representatives of  
22 NANPA, the National Numbering Plan Administrator, which manages and  
23 develops requirements for the NPAC database, to determine NPAC's actual

1 capabilities and to develop metrics for the completion of number portability tasks  
2 in a UNE-L environment. Today's NPAC forecasting process does not include all  
3 CLECs and thus does not provide the information necessary to determine the  
4 volumes of numbers that will require porting once CLECs move to UNE-L. This  
5 could significantly impact the NPAC and thus consumers. Volume testing or  
6 scalability analysis also will be required to determine whether NPAC actually can  
7 handle the volumes of numbers that will be ported in a single day. Since a failure  
8 of the NPAC system will have a direct negative impact on customers, it is critical  
9 that the movement to UNE-L for mass markets customers not take place until all  
10 parties are clear that the system can support the increased volumes.

11 **Q. ARE THERE ISSUES WITH LIDB AND CNAM?**

12 A. Yes. The LIDB and CNAM databases provide information on caller identity and  
13 blocking options. UNE-P customers today use the LIDB and CNAM databases  
14 provided by the ILEC, so that unless a CLEC customer chooses new blocking  
15 options when he or she migrates, no changes are required to his or her LIDB and  
16 CNAM information. When a customer migrates a telephone number to a  
17 facilities-based carrier, however, the losing company deletes the customer's  
18 information from the LIDB and CNAM databases and the acquiring carrier loads  
19 that information.

20 LIDB and CNAM are essential databases. Customer information for  
21 migrating customers whose LIDB and CNAM information is not loaded on time  
22 or is incorrect will have blank or incorrect calling name displays for caller ID or  
23 will have blocking options loaded incorrectly. This could lead to calls being

1 blocked by the called party due to missing information or to the improper  
2 rejection of third party billed calls.

3 **Q. WHY IS MCI CONCERNED ABOUT CNAM PROBLEMS?**

4 A. CLECs either must create CNAM data from published sources (which can result  
5 in a substandard database) or dip the ILEC systems to receive the data at a per dip  
6 rate. The CNAM database stores the information used to provide caller ID  
7 information. If this information is not provided, calls from CLEC customers to  
8 customers with features like anonymous call rejection cannot be completed; that  
9 is, the "anonymous call" will be rejected. Because UNE-L CLECs will have to  
10 develop their own CNAM databases from published sources (or pay the higher  
11 charge for a non-TELRIC priced database dip), this information will not  
12 necessarily mirror that provided when the customer was served by UNE-P,  
13 causing customer confusion, increased trouble calls, and potentially leading the  
14 customer to return to the ILEC.

15 **Q. CAN YOU GIVE US AN EXAMPLE OF THIS PROBLEM?**

16 A. Certainly. If a customer has a "non-published" but "listed" number, that  
17 number will not appear in the phone book but will be available via caller ID.  
18 When MCI or another CLEC that relies on its own databases migrates this  
19 customer to UNE-L, this information will change, since the CLEC will have only  
20 the published source (the directory) from which to create the CNAM record.  
21 After the customer is moved to UNE-L, calls from his telephone to other  
22 customers will not display CNAM information and his calls may be rejected as  
23 "anonymous."

1 **Q. DOES MCI HAVE A SOLUTION TO THIS PROBLEM?**

2 A. Yes. MCI recommends that the ILEC create a wholesale CNAM information  
3 product at a just and reasonable rate. This product would allow CLECs to obtain  
4 a download of the ILECs' databases when using UNE-L to ensure that there is  
5 consistency of information and that callers are provided with the fully functional  
6 features that they require. In addition, all of the parties, both vendors and the  
7 ILEC, need to examine the increase in LIDB and CNAM data volumes that they  
8 will have to handle to determine whether existing processes are sufficient. In  
9 addition, current processes for error checking and reject handling must be  
10 followed or new processes developed -- issues that were never addressed with  
11 UNE-P because the ILEC systems were used.

12 **Q. WHAT ISSUES FOR UNE-L MUST BE RESOLVED CONCERNING**  
13 **DIRECTORY LISTING AND DIRECTORY ASSISTANCE?**

14 A. With UNE-L, CLECs must send directory listing information to BellSouth to  
15 include in both the printed and on-line directories of each company. This step  
16 occurs as part of the UNE-L migration order.

17 **Q. DO CHANGES TO DL/DA OCCUR WITH UNE-P?**

18 A. No. No changes are necessary in a migration to UNE-P.

19 **Q. DO THEY OCCUR FOR UNE-L?**

20 A. Yes. The CLEC completes the directory listing form and sends it with its order to  
21 BellSouth for processing. While an "as is" (*i.e.*, no change) directory listing can  
22 be ordered from BellSouth as part of the "first" retail to UNE-L migration or  
23 UNE-P to UNE-L conversion, "as is" directory listings may not be appropriate for

1 subsequent changes, which means that the winning CLEC must provide complete  
2 directory listing information for the customer, thereby increasing the likelihood of  
3 errors or deletions in the directory as it is “opened” to remove listings and  
4 “closed” to put the same listings back in. Again, the sheer volume of directory  
5 changes to be processed if UNE-L were to become a viable mass-market service  
6 delivery method could have significant impacts on the directory publishing and  
7 operator services databases.

8 **Q. DOES MCI HAVE A PROPOSED RESOLUTION OF THIS ISSUE?**

9 A. Yes. MCI recommends that “migrate as is” functionality for directory listings be  
10 available for CLEC-to-CLEC migrations as well as for BellSouth-to-CLEC  
11 migrations to limit the number of times that this information must be added and  
12 deleted.

13 **Q. DO THESE INFORMATION EXCHANGE ISSUES HAVE A  
14 SIGNIFICANT EFFECT ON CUSTOMERS IN A UNE-L  
15 ENVIRONMENT?**

16 A. Yes. All of these customer record and information changes must take place as  
17 efficiently and seamlessly as possible in a UNE-L environment. It is critical that  
18 these various orders and transfers of information be coordinated to the greatest  
19 extent possible throughout the various systems and processes of each provider and  
20 between providers. A lack of coordination could result in errors in the customer  
21 records, the loss of customer data and loss of dial tone.

22 **Batch Hot Cut Process**

23

1 Q. THE FCC REQUIRES THE STATES TO APPROVE AND IMPLEMENT  
2 A “BATCH” HOT CUT PROCESS. WHAT IS THE PURPOSE OF THE  
3 “BATCH” HOT CUT PROCESS?

4 A. In an effort to alleviate some of the operational barriers to UNE-L recognized by  
5 the FCC, the *Triennial Review Order* requires that the states approve a batch hot  
6 cut process (“Transition Batch Hot Cut Process”) to transition UNE-P customers  
7 to UNE-L by cutting over unbundled loops in high volumes from BellSouth to  
8 CLECs. (*See, e.g., Order ¶¶ 487-490.*) The FCC expected that such a process  
9 would enable groups of UNE-P customers to be transitioned to UNE-L  
10 simultaneously in batches, thus “result[ing] in efficiencies associated with  
11 performing tasks once for multiple lines that would otherwise have been  
12 performed on a line-by-line basis.” (*Order ¶ 489.*) Yet although the FCC  
13 recognized that such “a seamless, low-cost batch cut process for switching mass  
14 market customers from one carrier to another is necessary, at a minimum, for  
15 carriers to compete effectively in the mass market,” it did not view this  
16 transitioning process as a panacea. (*See, e.g., Order ¶¶ 423 (describing the batch  
17 process as mitigating, not necessarily eliminating impairment), 487.*) Indeed,  
18 because this Transition Batch Hot Cut Process only addresses the issue of  
19 transitioning to UNE-L the base of customers that competitors like MCI have  
20 acquired on UNE-P, it is merely a discrete piece of the much larger puzzle that  
21 must be assembled before UNE-L can be seen as a viable service delivery  
22 method. In practical terms, eliminating the operational barriers associated with  
23 the every day hot cut process (“Mass Market Hot Cut Process”), which will be



1           used to move customers to and from multiple carriers in a dynamic competitive  
2           market, is at least as critical if not more critical than implementing a Transition  
3           Batch Hot Cut Process that is only useful for simultaneously moving batches of  
4           UNE-P customers to UNE-L.

5   **Q.   THE FCC ALSO REFERS TO THE CONCEPT OF “ROLLING ACCESS”**  
6   **IN ITS ORDER. WHAT IS “ROLLING ACCESS”?**

7   A.   In the *Triennial Review Order*, the FCC raises the possibility of a state  
8           commission granting CLECs “rolling access” to mass market switching, if the  
9           state commission determines that such access would cure a finding of CLEC  
10          impairment. (*See Order* ¶¶ 521-524.) With rolling access, CLECs would have  
11          “access to unbundled local circuit switching for a temporary period [at least 90  
12          days], permitting carriers first to acquire customers using unbundled incumbent  
13          LEC local circuit switching and later to migrate these customers to the  
14          competitive LECs’ own switching facilities.” (*Order* ¶¶ 521, 524.) In other  
15          words, rolling access would allow CLECs to use UNE-P to acquire customers at  
16          the outset, but then would require the CLECs to transition (that is, “roll off”)  
17          those customers to UNE-L within a specified period after acquisition.

18          Theoretically, this process would enable CLECs to avoid the delays and  
19          disruptions of service that would occur if CLECs had to acquire customers via  
20          UNE-L at the outset, because the customers would be first acquired and then  
21          transferred to UNE-L via the Transition Batch Hot Cut Process.

22   **Q.   WILL ROLLING ACCESS CURE THE OPERATIONAL BARRIERS**  
23   **FACING A MOVE TO UNE-L?**

1 A. No, as this description makes clear, rolling access does not remove the operational  
2 impairments presented by the everyday Mass Market Hot Cut Process, because it  
3 is simply a delayed batch hot cut process, one that focuses solely on transferring  
4 UNE-P customers to UNE-L. As I discuss above, the Mass Market Hot Cut  
5 Process will be essential for all customer transfers other than those from UNE-P  
6 to UNE-L. For instance, even if CLECs have rolling access, they will not be able  
7 to rely on the Transition Batch Hot Cut Process for CLEC-to-CLEC UNE-L  
8 migrations. Instead, when a customer wished to be migrated from a UNE-L  
9 CLEC, the customer first would have to be changed back to UNE-P so the  
10 customer could then be moved to the winning carrier. This situation would be the  
11 worst of all operational worlds. Therefore, regardless of whether the Transition  
12 Batch Hot Cut Process or rolling access addresses some aspects of CLEC  
13 impairment, it is critical that state commissions investigate and resolve the  
14 substantial operational barriers associated with the Mass Market Hot Cut process  
15 as well.

16 **Q. WHAT THEN SHOULD THE COMMISSION DO WITH RESPECT TO**  
17 **THE HOT CUT PROCESS?**

18 A. Although the Commission must comply with the FCC's requirement that it  
19 evaluate, approve and implement a Transition Batch Hot Cut Process, that task  
20 should not distract the Commission from working toward alleviating the distinct  
21 operational issues associated with the Mass Market Hot Cut Process. The  
22 Transition Batch Hot Cut Process necessarily will require a number of  
23 coordinated steps and scheduling with BellSouth, and thus substantial BellSouth

1 involvement and oversight. In contrast, the Mass Market Hot Cut Process will  
2 need to be a standardized, simple, and low-cost process that can take place on a  
3 day-to-day basis. And it will have to process migrations to and from retail, UNE-  
4 P, and resale customers, as well as disconnections, suspensions, and feature  
5 additions and changes. Thus, although a batch hot cut process may be helpful, it  
6 simply will not address the everyday operational barriers that exist in migrating  
7 customers from one UNE-L CLEC to another, from BellSouth to a UNE-L CLEC,  
8 and from a UNE-L CLEC to BellSouth. To address these more fundamental  
9 difficulties with UNE-L migrations, BellSouth must streamline the standard Mass  
10 Market Hot Cut process as well, so that it is as effective, efficient, seamless, low  
11 cost and scalable as possible, but without the special scheduling and BellSouth  
12 handling necessary for the Transition Batch Hot Cut Process. It is only when day-  
13 to-day migrations among all carriers, using all service delivery methods, take  
14 place quickly, efficiently and successfully, that a truly competitive market will  
15 exist. MCI discusses in detail its hot cut proposals in its Network Impairment  
16 Testimony.

17 **Q. HAS BELL SOUTH RECENTLY BEGUN TO EXPRESS WILLINGNESS**  
18 **TO IMPROVE ITS EXISTING BATCH ORDERING PROCESS?**

19 A. Yes. On January 31, 2004, BellSouth announced that it will make changes to its  
20 batch ordering process to alleviate some of the CLECs' concerns with its accuracy  
21 and timeliness. These changes include developing the on-line provisioning status  
22 tool requested by MCI, a shorter migration interval based on reducing the time  
23 required to "negotiate" with the BellSouth project manager, a due date scheduling

1 system, and a process to migrate customers to EELs. BellSouth has proposed to  
2 make these changes by the end of July 2004, but has not yet provided the detail  
3 necessary to evaluate them. And while the changes sound promising, it appears  
4 that BellSouth has not lifted the unnecessary requirement for creating a manual  
5 spreadsheet listing the lines that will be migrated or for “negotiating” the due  
6 dates for orders with the Project Manager. MCI recommends that BellSouth be  
7 required to participate in a commission-sponsored workshop to examine this  
8 process and determine what additional requirements will be necessary to ensure  
9 that UNE-P customers can be transitioned smoothly to UNE-L. In addition, the  
10 Commission should not approve this “new” process until it is formally  
11 documented, explained and tested.

12 **Q. HAVE OTHER ILECS WORKED WITH CLECS TO CREATE A BATCH**  
13 **MIGRATION PROCESS?**

14 A. Yes. SBC, Verizon, and Qwest have had ongoing collaboratives to work with  
15 CLECs to develop a batch migration process. SBC, Qwest, and Verizon have  
16 proposed automated processes that will allow the CLEC to select a due date for its  
17 orders and automated tools to track orders. Verizon’s tool, WPTS, is already  
18 available, while SBC and Qwest have committed to implementing the OSS  
19 changes necessary for these automated tools by the end of 2004. BellSouth’s  
20 promise of a new process needs to be backed up by documentation, explanation,  
21 and a plan for deployment and testing.

22 **Q. PLEASE BRIEFLY SUMMARIZE YOUR TESTIMONY.**

1 A. One of the major issues in this proceeding is whether operational impairment  
2 exists. For the reasons I have outlined, and the ones described in MCI's network  
3 operational testimony, it clearly does. But determining that operational  
4 impairment exists is the easy part of the Commission's job. The more difficult  
5 part is working with the industry to ensure that the barriers are removed. I have  
6 presented some approaches to known operational problems that should help the  
7 Commission and the industry progress toward making UNE-L operationally  
8 feasible for CLECs. As these problems and new ones that arise are addressed and  
9 remedied, the industry can begin to make UNE-L a reality.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 A. Yes, it does.