BellSouth Telecommunications, Inc.
Florida Public Service Commission
AT&T's 1st Request for Production
October 7, 2003
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REQUEST: With respect to the Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all documents containing or pertaining to performance data, studies, or other information that support the benchmark of 95% within 4 hours window for IDLC loops.

RESPONSE: Additional time to provide loops where existing service is provided over IDLC is necessary due to the fact that the process for handling a hot cut conversion with IDLC is significantly different than with non-IDLC. As an example, moving a jumper and then testing the circuit can accomplish a very simple non-IDLC hot cut. However, when a hot cut involves IDLC, the facility to the customer's premise is integrated with BellSouth's digital switch. The facility must be separated from BellSouth's switch prior to the hot cut because the switching port is provided by the CLEC. This may require a transfer to a non-IDLC facility and may also require a technician at the customer's premise and in the BellSouth central office. Occasionally, hot cuts involving IDLC may also require the placement of non-IDLC facilities prior to the day of the hot cut.

The number of hot cuts involving IDLC is an appreciable percentage of the total number of hot cuts, and when an IDLC hot cut does occur, additional flexibility is required to dispatch the technicians at both ends of the circuit. In terms of volume, in July 2003, there were 526 hot cuts in Florida, and, of these, 146 (or 27.7%) involved IDLC. In August 2003, there were 520 hot cuts and, of these, 163 (or 31.3%) involved IDLC.

If the interval for hot cuts involving IDLC is less than four hours, then in order to satisfy this measurement, BellSouth will have to dispatch a technician prior to the time the hot cut is scheduled to make a line and station transfer (LST) to place the customer service on a non-integrated facility. This approach requires additional work time for the technician, which is currently performed before the scheduled hot cut. Although this extra work means additional cost to BellSouth, which is not covered in the price for the service, unless a technician is dispatched to perform the LST the day before the scheduled hot cut, BellSouth would be unable to meet a 15-minute interval for cutting over loops.

Given this, BellSouth has a separate benchmark interval for Measure P-7A, Coordinated Customers Conversions – Hot Cut Timeliness % within Interval and Average Interval for hot cuts involving Integrated Digital Loop Carrier ("IDLC") in order to account for the greater time required to coordinate these hot cuts. BellSouth has a benchmark of 95% within a 4-hour window. This allows

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RESPONSE (CONT.):

BellSouth to dispatch the technician only once on the date the hot cut is scheduled to perform the station transfer to a non-IDLC facility, and to call the CWINS center when the technician is ready to perform the hot cut. The four-hour window would be 8 a.m. to 12 p.m. or 1 p.m. to 5 p.m. This four-hour window is consistent with the AM or PM dispatch strategy BellSouth currently has in place for other Provisioning work, providing the technicians sufficient time to complete all of the associated work with one dispatch in most cases.
On hot cuts involving IDLC, BellSouth would notify the CLEC by 10:30 a.m. the day before the scheduled cutover to advise the CLEC that IDLC is involved and that the four-hour window would apply.

The benchmark BellSouth proposes is consistent with the approach in New York, where Verizon has a four-hour window to cut over a loop served on IDLC. (See New York State Carrier-to-Carrier Guidelines Performance Standards and Reports, November 2002, PR-9 Hot Cut Performance.)