BELLSOUTH

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December 20, 2000

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Interconnection Agreement Negotiations Between AT&T Communications of the South Central States, Inc. TCG MidSouth, Inc. and BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. § 252*
Docket No. 00-00079

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Direct Testimony by the following witnesses:

W. Keith Milner
Ronald M. Pate
John A. Ruscilli

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH/jem

Enclosure

240409

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

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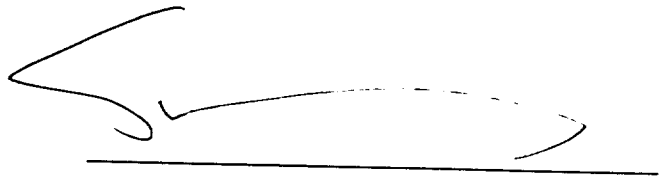

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BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF JOHN A. RUSCILLI

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 00-00079

DECEMBER 20, 2000

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

A. My name is John A. Ruscilli. I am employed by BellSouth as Senior Director for State Regulatory for the nine-state BellSouth region. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND EXPERIENCE.

A. I attended the University of Alabama in Birmingham where I earned a Bachelor of Science Degree in 1979 and a Master of Business Administration in 1982. After graduation I began employment with South Central Bell as an Account Executive in Marketing, transferring to AT&T in 1983. I joined BellSouth in late 1984 as an analyst in Market Research, and in late 1985 moved into the Pricing and Economics organization with various responsibilities for business case analysis, tariffing, demand analysis and price regulation. I served as a subject matter expert on ISDN tariffing in various

commission and public service commission staff meetings in Tennessee, Florida, North Carolina and Georgia. I later moved into the State Regulatory and External Affairs organization with responsibility for implementing both state price regulation requirements and the provisions of the Telecommunications Act of 1996, through arbitration and 271 hearing support. In July 1997, I became Director of Regulatory and Legislative Affairs for BellSouth Long Distance, Inc., with responsibilities that included obtaining the necessary certificates of public convenience and necessity, testifying, Federal Communications Commission ("FCC") and PSC support, federal and state compliance reporting and tariffing for all 50 states and the FCC. I assumed my current position in July 2000.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to present BellSouth's position on numerous issues raised by AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc. (collectively "AT&T") in its Petition for Arbitration filed with the Tennessee Regulatory Authority ("Authority") on February 4, 2000. BellSouth witnesses Mr. Keith Milner and Mr. Ron Pate will also file direct testimony in this case. In my testimony, I respond to the following issues as stated in the Revised Issues Matrix filed jointly by the parties on November 21, 2000: 1-5, 7, 9-10, 14 and 16.

Issue 1: Should calls to Internet service providers be treated as local traffic for the purposes of reciprocal compensation? (Attachment 3)

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. Reciprocal compensation should not apply to Internet Service Provider ("ISP")-bound traffic. Based on the Telecommunications Act of 1996 ("1996 Act") and the FCC's Local Competition Order, reciprocal compensation obligations under Section 251(b)(5) only apply to local traffic. ISP-bound traffic constitutes access service, which is clearly subject to interstate jurisdiction and is not local traffic.

BellSouth recognizes that, in the Authority's deliberations in the NEXTLINK, Time Warner and ITC^DeltaCom cases, the Authority determined that the parties are required to pay reciprocal compensation for ISP-bound traffic on an interim basis until the FCC issues rules establishing an inter-carrier compensation mechanism for such traffic. Rather than taking the Authority's time to relitigate this issue, BellSouth agrees that these previous rulings will apply to this issue in this arbitration. BellSouth requests, however, that the payment of reciprocal compensation for ISP-bound traffic be treated as an interim compensation mechanism that will be trued-up on a retroactive basis when the FCC establishes its mechanism for compensating such traffic. Reciprocal compensation will be at the rate the Authority will establish in Docket No. 97-01262 (Establishment of Permanent Prices for Interconnection and Unbundled Network Elements), even though those rates do not reflect the

actual lower cost of handling ISP-bound traffic. BellSouth accepts this resolution of this issue in this arbitration without waiving its right to appeal or to seek judicial review on this issue.

Issue 2: What does "currently combines" mean as that phrase is used in 47 C.F.R. § 51.315(b)? (Attachment 2)

Issue 3: Should BellSouth be permitted to charge AT&T a "glue charge" when BellSouth combines network elements?

Q. PLEASE BRIEFLY EXPLAIN THESE ISSUES.

A. These issues simply address whether BellSouth is obligated to combine unbundled network elements ("UNEs") for Competitive Local Exchange Carriers ("CLECs") when the elements are not already combined in BellSouth's network.

Q. HAS THE AUTHORITY PREVIOUSLY ADDRESSED THIS ISSUE?

A. Yes. In the NEXTLINK Arbitration Order dated May 18, 1999, the Authority found that "to the extent BellSouth is willing to combine transport and DCS for NEXTLINK, the parties should negotiate the charge that would apply to such combinations, with the combinations and charges not being subject to the requirements of the 1996 Act." (Order at p. 9). Therefore, the Authority has already determined that BellSouth is not obligated under the 1996 Act to

combine UNEs.

Recently, on November 22, 2000, the Authority issued its Second Interim Order in Docket No. 97-01262 reflecting the Authority's findings at the Authority Conference held on April 25, 2000. This order is an interim order addressing additional adjustments to be made in the parties' cost studies and adopting deaveraged proxy prices for UNE loops until such time as deaveraged permanent prices for UNEs are established. A final order has not yet been issued. On December 15, 2000, BellSouth filed a Motion for Clarification of a footnote in the Authority's interim order that could be read to require BellSouth to combine UNEs for CLECs. As explained in detail in BellSouth's motion, BellSouth does not believe that the statement in the footnote reflects a decision by the Authority on this important issue, particularly in light of existing federal law and the Authority's final order in the NEXTLINK arbitration.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth's position is that it will provide combinations to AT&T at cost-based prices if the elements are, in fact, combined and providing service to a particular customer at a particular location. That is, BellSouth will make combinations of UNEs available to AT&T consistent with BellSouth's obligations under the 1996 Act and applicable FCC rules. In light of the Eighth Circuit's ruling, BellSouth requests the Authority find that BellSouth is not obligated to combine UNEs that are not already physically combined.

Q. WHAT IS AT&T'S POSITION ON THIS ISSUE?

A. Apparently, AT&T continues to believe that "currently combined" and "currently combines" mean that if BellSouth combines the requested UNEs anywhere in its network, BellSouth has to produce the same combination of UNEs whenever and wherever AT&T demands.

Q. WHAT IS THE BASIS FOR BELLSOUTH'S POSITION?

A. As a general matter, it is neither sound public policy nor an obligation of BellSouth to combine UNEs. In the FCC's Third Report and Order and Fourth Further Notice of Proposed Rulemaking, FCC 99-238, released November 5, 1999 ("UNE Remand Order"), the FCC confirmed that ILECs presently have no obligation to combine network elements for CLECs when those elements are not currently combined in BellSouth's network. The FCC rules, Section 51.315(c)-(f), that purported to require incumbent LECs to combine unbundled network elements were vacated by the Eighth Circuit, and those rules were neither appealed to nor reinstated by the Supreme Court.

On July 18, 2000, the Eighth Circuit Court held that Incumbent Local Exchange Carriers ("ILECs") are not obligated to combine UNEs, and it reaffirmed that the FCC's Rules 51.315(c)-(f) remain vacated. Specifically, referring to Section 251(c)(3) of the 1996 Act that requires ILECs to provide UNEs in a manner that allows requesting carriers to combine such elements in

order to provide telecommunications services, the Eighth Circuit stated: "[h]ere Congress has directly spoken on the issue of who shall combine previously uncombined network elements. It is the requesting carriers who shall 'combine such elements.' It is not the duty of the ILECs to 'perform the functions necessary to combine unbundled network elements in any manner' as required by the FCC's rule."

Q. HOW DID THE FCC ADDRESS BELLSOUTH'S OBLIGATON TO COMBINE UNES IN ITS UNE REMAND ORDER?

A. The FCC concluded that BellSouth has no obligation to combine UNEs. As the FCC made clear, Rule 51.315(b) applies to elements that are "in fact" combined, stating that "[t]o the extent an unbundled loop is in fact connected to unbundled dedicated transport, the statute and our rule 51.315(b) require the incumbent to provide such elements to requesting carriers in combined form." (¶ 480, emphasis added). The FCC declined to adopt a definition of "currently combines," as AT&T proposes in this case, that would include all elements "ordinarily combined" in the incumbent's network. *Id.* (declining to "interpret rule 51.315(b) as requiring incumbents to combine unbundled network elements that are 'ordinarily combined'..."). It is nonsensical to suggest that the FCC meant for its Rule 51.315(b) to cover anything other than specific pre-existing combinations of elements for a customer when the FCC's orders specifically state that ILECs are not required to combine elements. As previously discussed, the Eighth Circuit has reaffirmed that BellSouth has no such obligation.

Q. WHY IS IT GENERALLY NOT IN THE PUBLIC INTEREST TO REQUIRE BELLSOUTH TO COMBINE UNEs?

A. First, requiring BellSouth to combine UNEs does not benefit consumers as a general matter, and would unnecessarily reduce the overall degree of competition in the market. Congress established several means to introduce competition, namely, resale, unbundling and facilities constructed by new entrants. The requirements of the 1996 Act attempt to balance these three entry methods such that firms use the most efficient method. However, the greatest benefits occur when firms build their own facilities. Expanding BellSouth's obligations beyond the 1996 Act's requirements would upset the balance intended by the 1996 Act. This is not just BellSouth's view – Justice Breyer of the Supreme Court agrees. As Justice Breyer points out in his opinion concurring in the Supreme Court's vacating of the FCC's unbundling rules:

> [i]ncreased sharing (unbundling) by itself does not automatically mean increased competition. It is in the unshared, not in the shared, portions of the enterprise that meaningful competition would likely emerge. Rules that force every firm to share every resource or element of a business would create, not competition, but pervasive regulation, for the regulators, not the marketplace, would set the relevant terms.
>
> The upshot, in my view, is that the statute's unbundling requirements, read in light of the Act's basic purposes require balance. Regulatory

> rules that go too far, expanding the definition of what must be shared beyond that which is essential to that which merely proves advantageous to a single competitor, risk costs that, in terms of the Act's objectives, may make the game not worth the candle. (142 L. Ed. 2d 834, 880).

Second, requiring BellSouth to combine UNEs at cost-based prices, particularly at Total Element Long Run Incremental Cost ("TELRIC")-based prices, reduces BellSouth's incentive to invest in new capabilities. TELRIC-based prices do not cover the actual cost of the elements, let alone do such prices represent a fair price in the market place. Again, Justice Breyer agrees, as evidenced by his observation that

> [n]or can one guarantee that firms will undertake the investment necessary to produce complex technological innovations knowing that any competitive advantage deriving from those innovations will be dissipated by the sharing requirement. The more complex the facilities, the more central their relation to the firm's managerial responsibilities, the more extensive the sharing demanded, the more likely these costs will become serious. (142 L. Ed. 2d 834, 879).

Finally, requiring BellSouth to combine elements where such combinations do not, in fact, exist is inconsistent with the 1996 Act's basic purpose, which is to introduce competition into the local market. The intent was not to subsidize competitors where CLECs have reasonable alternatives to BellSouth

combining UNEs. CLECs can combine the UNEs themselves in collocation spaces, use the assembly room option, use the assembly point option, or build their own facilities. Utilizing collocation to combine UNEs, the cost to the CLEC is just a few cents a month per combination. This view is also supported in Justice Breyer's opinion:

> [i]n particular, I believe that, given the Act's basic purpose, it requires a convincing explanation of why facilities should be shared (or 'unbundled') where a new entrant could compete effectively without the facility, or where practical alternatives to that facility are available. (142 L. Ed. 2d 834, 879).

Clearly, expanding BellSouth's obligation to include combining UNEs does not benefit consumers. Such action only provides an unwarranted subsidy to CLECs, removes incentives for BellSouth to invest in its network, and discourages CLECs from building their own networks.

Q. CAN AT&T STILL COMPETE VIGOROUSLY FOR LOCAL SERVICE WITHOUT HAVING BELLSOUTH COMBINE UNES AT COST-BASED PRICES?

A. They certainly can. There are over 2.7 million lines in service provided by BellSouth in Tennessee today. Each of those lines consists of existing combined facilities that AT&T can, in fact, purchase from BellSouth at cost-based rates. In addition, AT&T has several means to serve both new and

existing customers, other than by having BellSouth combine UNEs. Any argument that AT&T cannot compete because BellSouth won't put UNEs together just doesn't make sense.

Q. SPECIFICALLY REFERENCING ISSUE 3, WHAT IS BELLSOUTH'S POSITION REGARDING WHETHER A "GLUE CHARGE" SHOULD APPLY WHEN BELLSOUTH COMBINES UNES?

A. First, I need to explain what a "glue charge" is. Where BellSouth agrees to physically combine UNEs for a CLEC, the prices for such combinations will be market-based. AT&T contends that the Authority should order BellSouth to combine UNEs at cost-based prices. The difference between market-based and cost-based prices is referred to as a "glue charge" in this issue. The "glue charge" is not necessarily a separate charge; it is simply the difference in prices described above. As I have explained, and as the Authority recognized in its NEXTLINK Arbitration Order, BellSouth is not obligated to combine UNEs; therefore, the prices for this function are not subject to the cost-based pricing requirements of the 1996 Act. Consequently, BellSouth is permitted to include a "glue charge" in its prices for combining UNEs.

There is one exception to BellSouth's general position of requiring market-based prices to combine UNEs. BellSouth has elected to be exempted from providing access to unbundled local switching to serve customers with four or more lines in Density Zone 1 of the Nashville MSA. To avail itself of this exemption, the FCC requires BellSouth to combine loop and transport UNEs

(also known as the "Enhanced Extended Link" or "EEL") in the geographic area where the exemption applies. The FCC also requires that such combinations be provided at cost-based rates. BellSouth will physically combine loop and transport UNEs at FCC mandated cost-based prices as required in the FCC's UNE Remand Order in order to have the exemption from providing local circuit switching.

Beyond this limited exception dictated by the FCC, BellSouth is under no obligation to physically combine network elements, where such elements are not in fact combined. Nevertheless, BellSouth is willing to negotiate rates for combining UNEs; however, such negotiations are outside of a Section 251 arbitration, and the rates for this service are not subject to the pricing standards in Section 252 of the 1996 Act.

Q. HAS BELLSOUTH REACHED AGREEMENT WITH ANY CLECS CONCERNING THE CONDITIONS UNDER WHICH BELLSOUTH WILL COMBINE UNES?

A. Yes. Certain CLECs have requested that BellSouth provide the service of combining elements on the CLECs' behalf. These CLECs have entered into amendments to their interconnection agreements with BellSouth. The rates these CLECs pay for new combinations are market-based and appropriately compensate BellSouth for the service it is providing.

Q. WHAT DOES BELLSOUTH REQUEST OF THIS AUTHORITY?

A. BellSouth requests this Authority find that BellSouth is obligated to provide combinations to CLECs only where such combinations currently, in fact, exist and are providing service to a particular customer at a particular location. Nothing further is required or should be required of BellSouth in this regard.

Issue 4: Under what rates, terms, and conditions may AT&T purchase network elements or combinations to replace services currently purchased from BellSouth's tariffs? (Attachment 2)

Q. PLEASE BRIEFLY EXPLAIN THIS ISSUE.

A. This issue involves the rates, terms and conditions that should govern the conversion of special access services and other services to unbundled network elements. All aspects of this issue have been resolved except for the following two areas:

(1) Costs/Prices for converting other (non-special access) services to UNEs and

(2) the application of termination liability charges to services converted to UNEs.

I understand that the parties have agreed to defer all rates issues to the pending UNE dockets in Tennessee; therefore, I will not address sub-issue (1) at this time.

Q. WHAT LANGUAGE HAS BELLSOUTH PROPOSED TO AT&T REGARDING THE REMAINING SUB-ISSUE?

A. The contract language that BellSouth proposed to AT&T for conversion of tariffed services to UNEs is attached to my testimony as Exhibit JAR-1.

Q. WHAT IS BELLSOUTH'S POSITION REGARDING THE APPLICATION OF TERMINATION LIABILITY CHARGES AND VOLUME AND TERM DISCOUNTS WHEN SERVICES ARE CONVERTED TO UNES?

A. First, let me explain that this issue can address two situations. In one situation, an end user who has entered into a volume and term contract with BellSouth for tariffed services now wishes to terminate his retail relationship with BellSouth to move to another service provider. In the other situation, AT&T has purchased a tariffed service from BellSouth under a volume and term contract, and AT&T now wants to convert that tariffed service to UNEs. In either case, the entity that is terminating the contractual relationship will have the obligation to meet the termination provisions to which the entity agreed when the contract was made. I do want to mention that during the arbitration between AT&T and BellSouth that occurred in Louisiana on December 19, 2000, AT&T asserted that this dispute centered only on the situation where AT&T was the customer converting a tariffed service to UNEs, and that it was not disputing the applicability of termination charges in other situations. With that in mind, while my comments in response to this issue address both

situations, AT&T may take the position that only the one situation, where AT&T is the customer, is involved in this arbitration. If that is the case, that is fine with BellSouth and my comments should only be taken to address that situation.

Whether the existing service was purchased on a month-to-month (non-contractual) basis or under a volume and term or other contractual basis, BellSouth will convert such service to the appropriate pre-existing combination of UNEs upon request by AT&T at the rates in the agreement for the UNEs. However, if the service is currently provided under a contractual agreement with BellSouth, then the terms of the retail agreement or contract that are applicable to early termination, including payment of early termination liabilities, must be satisfied.

This result is clearly appropriate. A customer who is under contract generally pays lower rates than he would pay if he were not under contract. One purpose of termination liabilities is to ensure that the service provider receives a fair price for the service in the event the customer terminates the contract early. Therefore, if a contract is terminated early, it is appropriate for BellSouth to receive payment of the early termination charges. Moreover, to allow a customer, who has obtained the benefits of a lower price by promising to meet certain conditions, to avoid these termination liabilities discriminates against other similarly situated customers who must abide by the terms of their agreements.

Q. WHAT DOES BELLSOUTH REQUEST OF THE AUTHORITY?

A. BellSouth requests the Authority find that BellSouth's proposed contract language, as reflected in Exhibit JAR-1, is appropriate.

Issue 5: How should AT&T and BellSouth interconnect their networks in order to originate and complete calls to end-users? (Attachment 3)

Q. WHAT IS THE ESSENCE OF THE DISPUTE BETWEEN THE PARTIES ON THIS ISSUE?

A. The issue is pretty simple. BellSouth has a local network in each of the local calling areas it serves in Tennessee. BellSouth may have 10, 20 or even more such local networks in a given LATA. Nevertheless, AT&T wants to physically interconnect its network with BellSouth's "network" in each LATA at a single point, or perhaps two points. This approach simply ignores that there is not one BellSouth "network" but a host of networks that are all interconnected.

Importantly, BellSouth does not object to AT&T designating a single Point of Interconnection at a point in a LATA on one of BellSouth's "networks" for traffic that AT&T's end users originate. Further, BellSouth does not object to AT&T using the interconnecting facilities between BellSouth's "networks" to have local calls delivered or collected throughout the LATA. What BellSouth

does want, and this is the real issue, is for AT&T to be financially responsible when it uses BellSouth's network in lieu of building its own network to deliver or collect these local calls.

AT&T, to contrast its position with BellSouth's, expects BellSouth to collect local traffic bound for AT&T's end users in each of BellSouth's numerous local calling areas in the LATA, and AT&T expects BellSouth to be financially responsible for delivering, to a single point (or, at most, to two points) in each LATA, local calls that are destined for AT&T's local customers within the same local calling area where the call originated. I should point out that AT&T has said that, for network security reasons, AT&T may establish a second point of interconnection in a LATA. However, whether or not that point is ever established, AT&T maintains that the location of the point is solely at AT&T's discretion. Indeed, AT&T has only committed to establish a single point of interconnection in each LATA.

BellSouth agrees that AT&T can choose to interconnect with BellSouth's network at any technically feasible point in the LATA. However, BellSouth does not agree that AT&T can impose upon BellSouth the financial burden of delivering BellSouth's originating local traffic to that single point. If AT&T wants local calls completed between BellSouth's customers and AT&T's customers using this single Point of Interconnection, that is fine, provided that AT&T is financially responsible for the additional costs AT&T causes.

Q. DOES BELLSOUTH'S POSITION MEAN THAT AT&T HAS TO BUILD A NETWORK TO EVERY LOCAL CALLING AREA, OR OTHERWISE HAVE A POINT OF INTERCONNECTION WITH BELLSOUTH'S LOCAL NETWORK IN EVERY LOCAL CALLING AREA?

A. No. AT&T can build out its network that way if it chooses, but it is not required to do so. AT&T can lease facilities from BellSouth or any other provider to bridge the gap between its network (that is, where it designates its Point of Interconnection) and each BellSouth local calling area. BellSouth will be financially responsible for transporting BellSouth's originating traffic to a single point in each local calling area. However, BellSouth is not obligated to be financially responsible for hauling AT&T's local traffic to a distant point dictated by AT&T.

Q. WHAT IS A POINT OF INTERCONNECTION?

A. The term "Point of Interconnection" describes the point(s) where BellSouth's and AT&T's networks physically connect. In its First Report and Order, at paragraph 176, the FCC defined the term "interconnection" by stating that:

> We conclude that the term "interconnection" under section 251(c)(2) refers only to the physical linking of two networks for the mutual exchange of traffic.

Therefore, the Point of Interconnection is simply the place, or places, on BellSouth's networks where that physical linking of AT&T's and BellSouth's

networks takes place. Simply put, the Point of Interconnection is the place where facilities that AT&T owns connect to facilities owned by BellSouth.

The term "interconnection point" is used by AT&T and BellSouth to define the place where financial responsibility for a call changes from one carrier to the other. The "Point of Interconnection" and the "interconnection point" can be at the exact same physical point, or they can be at different points.

Q. IF AT&T CAN INTERCONNECT WITH BELLSOUTH'S NETWORK AT ANY TECHNICALLY FEASIBLE POINT, WHY IS THIS AN ISSUE?

A. Recall that what we are talking about here is the interconnection of "local networks." AT&T's network deployment is significantly different from BellSouth's, which is the main reason that this issue exists between the parties. BellSouth has a number of distinct functional networks. For example, BellSouth has local networks, long distance networks, packet networks, signaling networks, E911 networks, etc. Each of these networks is designed to provide a particular service or group of services. With regard to "local networks," BellSouth, in any given LATA, has several such local networks, interconnected by BellSouth's long distance network. BellSouth's networks are "seamless" in the sense that a customer connected to one network can access another network upon payment of the appropriate fees and they overlap, in the sense that an end office is used for both local and toll calls. However, these networks are individual networks in the sense that when a customer pays for local service in the Nashville local calling area, that is what the customer

gets. The customer does not get access to other distant local calling areas, at least not without payment of the appropriate fees.

For instance, in the Nashville LATA, BellSouth has local networks in Nashville, Ashland City, Cumberland City and Pleasant View, as well as several other locations. Customers who want local service in a particular local calling area must be connected to the local network that serves that local calling area. For example, a BellSouth customer who connects to the Nashville local network will not receive local service in the Cumberland City local calling area because Cumberland City is not in the Nashville local calling area. Likewise, a CLEC who wants to connect with BellSouth to provide local service in Cumberland City has to connect to BellSouth's local network that serves the Cumberland City local calling area. BellSouth's local calling areas, I would add, have been defined and set out over the years either by this Authority or by BellSouth with the approval of this Authority.

When AT&T has a single switch in a LATA, then, by definition, that switch is located in a single BellSouth local calling area, for example, the Nashville local calling area, if that is where the switch is located. When a BellSouth local customer in Nashville wants to call an AT&T local customer in Nashville, BellSouth delivers the call to the appropriate point of interconnection between BellSouth's network and AT&T's network in Nashville. This network configuration is illustrated on Page 1 of Exhibit JAR-2 attached to my testimony. BellSouth would be financially responsible for taking a call from one of its subscribers located in the Nashville local calling

area and delivering it to another point in the Nashville local calling area, the AT&T Point of Interconnection. This scenario is not a problem.

Next, consider the scenario shown on Page 2 of Exhibit JAR-2, which is a call between two BellSouth customers in Cumberland City. In that scenario, the call originates with BST EU A and terminates to BST EU C. Again, the call would not leave the local calling area and, in this situation, BellSouth would be responsible for both the origination and termination of the call.

The problem arises when a BellSouth customer located in a distant local calling area from AT&T's Point of Interconnection wants to call his next-door neighbor who happens to be an AT&T local subscriber. This scenario is shown on Page 3 of Exhibit JAR-2. Assume that a BellSouth customer in Cumberland City calls an AT&T customer in Cumberland City. The originating customer draws dial tone from BellSouth's Cumberland City switch. The BellSouth customer then dials the AT&T customer and, under AT&T's proposal, the call has to be hauled outside of the local calling area from Cumberland City to AT&T's Point of Interconnection in Nashville. AT&T then carries the call to its switch in Nashville and connects to the long loop serving AT&T's customer in Cumberland City. Again, and importantly, as shown on Page 2 of Exhibit JAR-2, the call never needed to leave the Cumberland City local calling area. However, under AT&T's proposal as shown on Page 3, the same call would have to be hauled by BellSouth all the way to Nashville, simply because Nashville is where AT&T decided to designate its Point of Interconnection. Simply put, the issue here involves who

is financially responsible for the facilities that are used to haul calls back and forth between AT&T's Point of Interconnection in Nashville and the BellSouth Cumberland City local calling area.

Q. HOW WOULD AT&T CONNECT TO BELLSOUTH'S LOCAL NETWORKS THAT ARE OUTSIDE THE LOCAL CALLING AREA WHERE AT&T'S SWITCH IS LOCATED?

A. It is my understanding that AT&T has agreed to establish at least one Point of Interconnection in each LATA. This is necessary because BellSouth is still not authorized to carry traffic across LATA boundaries. AT&T would build facilities from its switch (wherever it is located) to the Point of Interconnection in the LATA where the BellSouth local network is located. Once that Point of Interconnection is established, the issue remains the same. Who is financially responsible for the facilities needed to carry calls between that Point of Interconnection and the distant BellSouth local calling area in which a local call is to be originated and terminated? Since AT&T must establish a Point of Interconnection in each LATA, whether or not AT&T also has a switch in each LATA is not relevant to resolving the problem that AT&T's network design has created.

Q. WHY DO YOU SAY THAT AT&T MUST BE FINANCIALLY RESPONSIBLE FOR THE TRANSPORT OF THESE CALLS FROM LOCAL CALLING AREAS THAT ARE DISTANT FROM THE POINT WHERE AT&T HAS CHOSEN TO INTERCONNECT ITS NETWORK

WITH BELLSOUTH'S?

A. First, that is the only approach that makes economic sense. I will explain the rationale for this statement later. Second, the Eighth Circuit determined that the ILEC is only required to permit a CLEC to interconnect with the ILEC's existing local network, stating that:

> The Act requires an ILEC to (1) permit requesting new entrants (competitors) in the ILEC's local market to interconnect with the ILEC's existing local network and, thereby, use that network to compete in providing local telephone service (interconnection).... (Eighth Circuit Court Order dated July 18, 2000, page 2).

This is a very important point. When AT&T interconnects with BellSouth's local network in Nashville, it is not also interconnecting with BellSouth's local network in Cumberland City for the purpose of receiving BellSouth's originating local traffic from Cumberland City. AT&T is only interconnecting with the Nashville local network. The fact that AT&T is entitled to physically connect with BellSouth at a single point in the LATA cannot overcome the fact that the single Point of Interconnection cannot, by itself, constitute interconnection with every single local calling area in a LATA for BellSouth's originating local traffic from those local calling areas.

If that were true, think of the implications. Absent LATA restrictions, AT&T's theory would mean that AT&T could have a physical Point of Interconnection with BellSouth's "network" in Knoxville, and BellSouth would be required to haul local calls originating in Cumberland City and destined to terminate in

Cumberland City all the way to Knoxville, at no cost to AT&T. Moreover, this is not simply a hypothetical situation I am describing. In the just completed Louisiana arbitration, AT&T stated that they were doing local switching for the New Orleans LATA, at least in part, with a switch that was located in St. Louis, Missouri, which is at least two states away from New Orleans. That just does not make sense. Again, AT&T can build whatever network it wants, and it can interconnect with BellSouth's "network" wherever it is technically feasible. However, AT&T cannot shift the financial burden of its network design to BellSouth.

Q. PLEASE EXPLAIN HOW AT&T IS ATTEMPTING TO SHIFT ITS FINANCIAL RESPONSIBILITY TO BELLSOUTH.

A. As I have explained above, AT&T's network design results in additional costs that AT&T inappropriately contends BellSouth should bear. Again, AT&T wants BellSouth to bear the cost of the facilities used to haul the call I just described between Cumberland City and Nashville. There is nothing fair, equitable or reasonable about AT&T's position. Because AT&T has designed its network the way it wants, and has designed its network in the way that is cheapest for AT&T, AT&T must bear the financial responsibility for the additional facilities used to haul the call between Cumberland City and Nashville. AT&T does not have to actually build the facilities. It does not have to own the facilities. It just has to pay for them. BellSouth objects to paying additional costs that are incurred solely due to AT&T's network design.

It is simply inappropriate for AT&T to attempt to shift these costs to BellSouth.

Q. DO BELLSOUTH'S LOCAL EXCHANGE RATES COVER THESE ADDITIONAL COSTS?

A. No. BellSouth is, in theory at least, compensated by the local exchange rates charged to BellSouth's local customers for hauling all calls from one point within a specific local calling area to another point in that same local calling area. Certainly there would be no dispute that the local exchange rates that BellSouth's customers pay were not intended to cover and, indeed, cannot cover, the cost of hauling a local call from one Cumberland City customer to another Cumberland City customer by way of Nashville.

Indeed, if AT&T is not required to pay for that extra transport which AT&T's network design decisions caused, who will pay for it? The BellSouth calling party is already paying for its local exchange service, and certainly will not agree to pay more simply for AT&T's convenience. Who does that leave to cover this cost? The answer is that there is no one else, and because AT&T has caused this cost through its own decisions regarding the design of its network, it should be required to pay for this additional cost.

Q. IS THE ARRANGEMENT THAT AT&T IS PROPOSING EFFICIENT?

A. No. AT&T seems to equate efficiency with what is cheapest for AT&T. Of

course, that is not an appropriate measure of efficiency. Indeed, to measure efficiency, the cost to every carrier involved must be considered. Presumably, AT&T has chosen its particular network arrangement because it is cheaper for AT&T. A principal reason that it is cheaper for AT&T is because AT&T is expecting BellSouth's customers to bear substantially increased costs that AT&T causes by its network design. It simply makes no sense for BellSouth to bear the cost of hauling a local Cumberland City call outside the local calling area just because that is what AT&T wants BellSouth to do. AT&T, however, wants this Authority to require BellSouth to do just that. If AT&T bought these facilities from anyone else, AT&T would pay for the facilities. AT&T, however, does not want to pay BellSouth for the same capability.

AT&T's method of transporting local traffic is clearly more costly to BellSouth, but AT&T blithely ignores the additional costs it wants BellSouth to bear. Of course, these increased costs will ultimately be borne by customers, and if AT&T has its way, these costs will be borne by BellSouth's customers. Competition should reduce costs to customers, not increase them. Competition certainly is not an excuse for enabling a carrier to pass increased costs that it causes to customers it does not even serve. BellSouth requests that the Authority require AT&T to bear the cost of hauling local calls outside BellSouth's local calling areas. Importantly, AT&T should not be permitted to avoid this cost, nor should AT&T be permitted to collect reciprocal compensation for facilities that haul local traffic outside of the local calling area.

Q. HOW HAS THE FCC ADDRESSED THE ADDITIONAL COSTS CAUSED BY THE FORM OF INTERCONNECTION A CLEC CHOOSES?

A. In its First Report and Order in Docket No. 96-98, the FCC states that the CLEC must bear the additional costs caused by a CLEC's chosen form of interconnection. Paragraph 199 of the Order states that "a requesting carrier that wishes a 'technically feasible' but expensive interconnection would, pursuant to section 252(d)(1), be required to bear the cost of that interconnection, including a reasonable profit." (emphasis added). Further, at paragraph 209, the FCC states that "Section 251(c)(2) lowers barriers to competitive entry for carriers that have not deployed ubiquitous networks by permitting them to select the points in an incumbent LEC's network at which they wish to deliver traffic. Moreover, because competing carriers must usually compensate incumbent LECs for the additional costs incurred by providing interconnection, competitors have an incentive to make economically efficient decisions about where to interconnect." (emphasis added).

Clearly, the FCC expects AT&T to pay the additional costs that it causes BellSouth to incur. If AT&T is permitted to shift its costs to BellSouth, AT&T has no incentive to make economically efficient decisions about where to interconnect.

Q. WOULD AT&T'S ABILITY TO COMPETE BE HAMPERED BY AT&T'S INABILITY TO OBTAIN FREE FACILITIES FROM BELLSOUTH?

A. Absolutely not. First, AT&T does not have to build or purchase interconnection facilities to areas that AT&T does not plan to serve. If AT&T does not intend to serve any customers in a particular area, its ability to compete cannot be hampered.

Second, in areas where AT&T does intend to serve customers, BellSouth is not requiring AT&T to build facilities throughout the area. AT&T can build facilities to a single point in each LATA and then purchase whatever facilities it needs from BellSouth or from another carrier in order to reach individual local calling areas that AT&T wants to serve.

Q. WHAT DOES BELLSOUTH REQUEST OF THIS AUTHORITY?

A. BellSouth requests the Authority to find that AT&T is required to bear the cost of facilities that BellSouth may be required to install, on AT&T's behalf, in order to connect from a BellSouth local calling area to AT&T's Point of Interconnection located outside that local calling area. I believe this to be an equitable arrangement for both parties.

Issue 7: Should AT&T be permitted to charge tandem rate elements when its switch serves a geographic area comparable to that served by BellSouth's tandem switch? (Attachment 3)

Q. PLEASE BRIEFLY EXPLAIN THIS ISSUE.

A. The FCC's rules established that, when two carriers are involved in delivery of local traffic, the originating carrier would compensate the terminating carrier for certain additional costs incurred to transport and terminate local calls from the originating carrier's customers. The FCC limited such compensation to be symmetrical unless the CLEC could demonstrate that it was using an efficient configuration to transport and terminate the calls and that such configuration justified asymmetrical rates. Under symmetrical reciprocal compensation, the CLEC applies the ILEC's rate for transport and termination. The FCC determined that there should be two rates for transport and termination. One rate applies where tandem switching is involved (tandem rate) and the other rate applies where tandem switching is not involved (end office rate). The tandem rate simply consists of both the end office switching rate and the tandem switching rate. As a surrogate for these two rates, many state commissions have used the UNE rates of the involved network components as the basis for reciprocal compensation.

Q. HOW DOES BELLSOUTH USE TANDEM SWITCHES?

A. BellSouth has both local and access tandems. First, I will address local tandems. Sometimes there are so many local switches in a given local calling area that it makes economic sense to create a local tandem to help handle the flow of local calls between the end office switches. In this case, the local tandem is connected to numerous end office switches in the local calling area, thereby eliminating the need to have every end office switch in that local

calling area connected directly to every other end office switch in that local calling area. In this situation, a caller who is served by one end office switch can place a local call to a subscriber served by another end office switch, and the call can be routed through the local tandem, rather than being trunked directly to the called party's local end office switch. Obviously, if there are a lot of end office switches in a local calling area, using a tandem switch to aggregate traffic and to act as a central connection point makes economic sense and avoids a lot of extra trunking that would otherwise be required to ensure that call blockage was limited to acceptable levels.

The local tandem is functionally quite similar to what is often referred to as an access tandem. An access tandem is a tandem switch that is also connected to all of the local central offices in a given area. The difference is that the access tandem handles both local and long distance traffic while the local tandem only handles local traffic.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. In order for AT&T to appropriately charge for tandem switching, AT&T must demonstrate to the Authority that: 1) its switches serve a comparable geographic area to that served by BellSouth's tandem switches and that 2) its switches actually perform local tandem functions. AT&T should only be compensated for the functions that it actually provides.

BellSouth proposes to bill AT&T for use of a tandem only when BellSouth

incurs the cost of tandem switching on a particular local call. Further, BellSouth proposes to pay AT&T the tandem switching rate only when AT&T incurs the cost of tandem switching on a particular local call. To incur this cost, AT&T must provide the functionality of a tandem switch, as opposed to an end office switch, and AT&T must be serving a geographic area comparable to a BellSouth tandem.

Q. WHAT IS AT&T'S POSITION ON THIS ISSUE?

Apparently, because AT&T's switches can serve the same geographic area, AT&T's position is that AT&T should always receive the rate for tandem switching, regardless of whether AT&T actually performs the tandem function for a particular local call. AT&T contends it should be allowed to charge BellSouth for tandem switching on every local call, regardless of whether AT&T incurs the cost.

Q. WHAT IS THE BASIS FOR BELLSOUTH'S POSITION ON THIS ISSUE?

A. In its Local Competition Order, the FCC stated that the "additional costs" of transporting and terminating local traffic vary depending on whether or not a tandem switch is involved. (¶ 1090). As a result, the FCC determined that state commissions can establish transport and termination rates that vary depending on whether the traffic is routed through a tandem switch or directly to a carrier's end-office switch. *Id.* To that end, BellSouth has separate rates for transport and termination depending upon whether tandem switching is

involved. When a CLEC's end user originates a local call that terminates on BellSouth's local network, BellSouth charges the CLEC a different rate for reciprocal compensation based on whether or not local tandem switching is involved in that call. When a BellSouth end user originates a local call that terminates on the CLEC's network, the CLEC should only charge the tandem rate when the CLEC actual provides the tandem switching function.

The FCC, of course, recognized that a CLEC might not use the same network architecture as BellSouth or any other incumbent carrier. In order to insure that a CLEC would receive the equivalent of a tandem switching rate if it were warranted, the FCC directed state commissions to do two things. First, the FCC directed state commissions to "consider whether new technologies (e.g., fiber ring or wireless network) performed functions similar to those performed by an incumbent LEC's tandem switch and thus whether some or all calls terminating on the new entrant's network should be priced the same as the sum of transport and termination via the incumbent LEC's tandem switch." (Local Competition Order ¶ 1090, emphasis added). Second, the FCC stated that "[w]here the interconnecting carrier's switch serves a geographic area comparable to that served by the incumbent LEC's tandem switch, the appropriate proxy for the interconnecting carrier's additional costs is the LEC tandem interconnection rate." *Id.*

Therefore, the FCC posed two requirements that must be met before a CLEC would be entitled to compensation at both the end office and the tandem switching rate, as opposed to only the end office rate, for any particular local

call. The tandem switch involved has to serve a comparable geographic area, and it has to perform the tandem switching function for the local call for which compensation is sought.

BellSouth notes that in Section 51.711(a)(1) of its Rules, the FCC states that "symmetrical rates are rates that a carrier other than an incumbent LEC assesses upon an incumbent LEC for transport and termination of local telecommunications traffic equal to those that the incumbent LEC assesses upon the other carrier for the same services." (emphasis added). Again, in Section 51.711(a)(3), the Rule states that "[w]here the switch of a carrier other than an incumbent LEC serves a geographic area comparable to the area served by the incumbent LEC's tandem switch, the appropriate rate for the carrier other than an incumbent LEC is the incumbent LEC's tandem interconnection rate." The FCC clearly has two requirements that must be met before the tandem rate for transporting and terminating traffic applies.

Q. DOES THE AUTHORITY NEED TO DECIDE WHETHER A NEW TECHNOLOGY USED BY AT&T PERFORMS A FUNCTION SIMILAR TO TANDEM SWITCHING?

A. No. The basic network architecture used by AT&T is the same as BellSouth, so the Authority does not need to attempt to determine whether some new technology used by AT&T performs functions similar to tandem switching. The Authority simply needs to determine whether AT&T is actually providing tandem switching on each and every local call. Thus, pursuant to Section

51.711, in order to charge BellSouth the tandem rate, AT&T must show not only that its switches serve a geographic area comparable to BellSouth's tandem switches, but also that AT&T's switches are providing the same services as BellSouth's tandem switches for local traffic.

Q. HAS THE FCC DEFINED WHICH FUNCTIONS A TANDEM SWITCH MUST PROVIDE?

A. Indeed it has. In its recently released Order No. FCC 99-238, the FCC's rules at 51.319(c)(3) state:

> *Local Tandem Switching Capability.* The tandem switching capability network element is defined as:
>
> (i) Trunk-connect facilities, which include, but are not limited to, the connection between trunk termination at a cross connect panel and switch trunk card;
>
> (ii) The basic switch trunk function of connecting trunks to trunks; and
>
> (iii) The functions that are centralized in tandem switches (as distinguished from separate end office switches), including but not limited, to call recording, the routing of calls to operator services, and signaling conversion features.

Of course, this definition of tandem switching capability has long been accepted and applied within the telecommunications industry. The introduction of local competition has no effect on the definition of tandem

switching capability.

Q. HOW DOES THE FCC'S DEFINITION OF TANDEM SWITCHING APPLY TO THIS ISSUE?

A. To receive reciprocal compensation at the tandem rate, a carrier must be performing the functions described in the FCC's definition of tandem switching. It is not enough that the switch "can" provide the function of a tandem switch; it has to actually be providing those functions for the local call for which compensation is sought. This is true if for no other reason than because the difference between the end office and tandem rates for reciprocal compensation is the same as the UNE rate for tandem switching. That rate recovers the cost of performing, for local calls, the functions described in the FCC's definition. If the CLEC were not performing those functions, the CLEC would simply be receiving a windfall.

AT&T's switches are not providing a tandem function to transport <u>any</u> local calls, let alone <u>all</u> local calls, but are only switching traffic through AT&T's end office switches for delivery of that traffic from those switches to the called party's premises. As stated in the FCC's definition, to provide transport utilizing tandem switching, AT&T's switch must connect trunks terminated in one end office switch to trunks terminated in another end office switch. In other words, a tandem switch, as defined by the FCC, provides an intermediate switching function. As AT&T has admitted, its switch is not providing that function. During cross-examination in North Carolina Dockets No. P-140, Sub

73 and No. P-646, Sub 7, AT&T witness Mr. David Talbott concurred that "[t]here is not an intermediate switching function within the AT&T network." (Transcript, Vol. 2, August 1, 2000, p. 227, lines 6-9). Further, when asked if AT&T's switch would qualify for the tandem rate if the North Carolina Commission concludes that an intermediate switching function is required, Mr. Talbott stated "[o]ur switch would not qualify." (Id., p. 227, line 21-p. 228, line 1).

As confirmed by AT&T's own witness, AT&T's switch connects trunks to end user's lines, and does not connect trunks to trunks. In this regard, there is nothing different about AT&T's network design in Tennessee as compared to its network design in North Carolina. The end office rate for transport and termination fully compensates AT&T for the functions its end office switches perform.

Q. HAS THIS AUTHORITY PREVIOUSLY, IN AN ARBITRATION PROCEEDING, CONSIDERED THE ISSUE OF APPLICABILITY OF RECIPROCAL COMPENSATION TO TANDEM SWITCHING?

Yes, in its deliberations in the ITC^DeltaCom arbitration, the Authority determined that ITC^DeltaCom did not satisfy its burden of proof on the tandem interconnection issue and, thus, is only entitled to be compensated at the end office rate in addition to applicable transport charges.

Q. WHAT DOES BELLSOUTH REQUEST THE AUTHORITY DO?

A. Importantly, BellSouth is not disputing AT&T's right to compensation at the tandem rate where the facts support such a conclusion. However, in this proceeding, AT&T is seeking a decision that allows it to be compensated for the cost of equipment it does not own and for functionality it does not provide. Absent real evidence that AT&T's switches actually serve a geographic area comparable to BellSouth's tandems, and absent evidence that AT&T's switches actually perform tandem switching functions for local traffic, BellSouth requests that this Authority determine that AT&T is only entitled, where it provides local switching, to the end office switching rate.

Issue 9: What is the appropriate treatment of outbound voice calls over internet protocol ("IP") telephony, as it pertains to reciprocal compensation? (Attachment 3)

Q. PLEASE EXPLAIN BELLSOUTH'S UNDERSTANDING OF THIS ISSUE.

A. This issue addresses the appropriate compensation for phone-to-phone calls that utilize a technology known as Internet Protocol ("IP"). First, let me be clear on the distinction between "voice calls over the Internet" and "voice calls over Internet Protocol ("IP") telephony." IP Telephony is, in very simple and basic terms, a mode or method of completing a telephone call. The word "Internet" in Internet Protocol telephony refers to the name of the protocol; it does <u>not</u> mean that the service necessarily uses the World Wide Web.

Q. WHAT IS PHONE-TO-PHONE IP TELEPHONY?

A. Phone-to-Phone IP Telephony is telecommunications service that is provided using Internet Protocol for one or more segments of the call. Technically speaking, Internet Protocol, or any other protocol, is an agreed upon set of technical operating specifications for managing and interconnecting networks. The Internet Protocol is a specific language that equipment on a packet network uses to intercommunicate. It has nothing to do with the transmission medium (wire, fiber, microwave, etc.) that carries the data packets between gateways, but rather concerns gateways, or switches, that are found on either end of that medium.

Currently there are various technologies used to transmit telephone calls, of which the most common are analog and digital. In the case of IP Telephony originated from a traditional telephone set, the local carrier first converts the voice call from analog to digital. The digital call is sent to a gateway that takes the digital voice signal and converts or packages it into data packets. These data packets are like envelopes with addresses that "carry" the signal across a network until they reach their destination, which is known by the address on the data packet, or envelope. This destination is another gateway, which reassembles the packets and converts the signal to analog, or a plain old telephone call, to be terminated on the called party's local telephone company's lines.

To explain it another way, Phone-to-Phone IP Telephony occurs when an end user customer uses a traditional telephone set to call another traditional

telephone set using IP technology. The fact that IP technology is used at least in part to complete the call is transparent to the end user. Phone-to-Phone IP Telephony is identical, by all relevant regulatory and legal measures, to any other basic telecommunications service, and should not be confused with calls to the Internet through an ISP. Characteristics of Phone-to-Phone IP Telephony are:

- IP Telephony provider gives end users traditional dial tone (not modem buzz);
- End user does not call modem bank;
- Uses traditional telephone sets (vs. computer);
- Call routes using telephone numbers (not IP addresses);
- Basic telecommunications (not enhanced); and
- IP Telephone providers are telephone carriers (not ISPs).

Phone-to-Phone IP Telephony should not be confused with Computer-to-Computer IP Telephony, where computer users use the Internet to provide telecommunications to themselves.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. As with any other local traffic, reciprocal compensation should apply to local telecommunications provided via IP Telephony, to the extent that it is technically feasible to apply such charges. To the extent, however, that calls provided via IP telephony are long distance calls, access charges should apply. Application of access charges for long distance calls does not depend on the technology used to transport such calls. Due to the increasing use of IP

technology mixed with traditional circuit switching technology to switch or transport voice telecommunications, BellSouth's position is that it is important to specify in the agreement that long distance calls, irrespective of the technology used to transport them, constitute switched access traffic and not local traffic.

Switched access charges, not reciprocal compensation, apply to phone-to-phone long distance calls that are transmitted using IP telephony. From the end user's perspective – and, indeed, from the IXC's perspective – such calls are indistinguishable from regular circuit switched long distance calls. The IXC may use IP technology to transport all or some portion of the long distance call, but that does not change the fact that it is a long distance call.

Q. WHAT IS AT&T'S POSITION ON THIS ISSUE?

A. It appears that AT&T is attempting to inappropriately assert the ESP exemption to all calls, and treat all calls using IP telephony as local traffic. Consider the example of a call from Nashville to Knoxville sent over AT&T's circuit switched network. Certainly, this call is a long distance call, and access charges would apply. However, if AT&T transported that same call using IP telephony, AT&T evidently would claim that the call from Nashville to Knoxville is a local call and that reciprocal compensation applies. Now, AT&T makes this claim despite the fact that it charges the customer the same long distance price in either case. This position is ridiculous. AT&T's choice of transmission medium does not transform a long distance call into a local

call.

Q. DOES THE FCC VIEW CALLS TO INFORMATION SERVICE PROVIDERS ("ISP-BOUND TRAFFIC") DIFFERENTLY THAN PHONE-TO-PHONE IP TELEPHONY IN TERMS OF APPLICABLE CHARGES?

A. Yes. Neither ISP-bound traffic nor the transmission of long distance services via IP Telephony traffic is local traffic; however, the FCC has treated the two types of traffic differently in terms of the rates that such providers pay for access to the local exchange company's network. Calls to Information Service Providers have been exempted by the FCC from access charges for use of the local network in order to encourage the growth of these emerging services – most specifically access to the Internet. The FCC has found that ISPs use interstate access service, but are exempt from switched access charges applicable to other long distance traffic. As a result of this FCC exemption, ISP-bound traffic is assessed at the applicable business exchange rate.

On the other hand, the transmission of long-distance voice services - whether by IP telephony or by more traditional means - is not exempt from switched access charges. The FCC has provided no exemption from access charges when IP telephony is used to transmit long distance telecommunications.

The FCC's April 10, 1998 Report to Congress states: "The record... suggests... 'phone-to-phone IP telephony' services lack the characteristics that would render them 'information services' within the meaning of the statute,

and instead bear the characteristics of 'telecommunication services'." Further, Section 3 of the 1996 Act defines "telecommunications" as the "transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information as sent and received." Thus, IP Telephony is telecommunications service, not information or enhanced service.

Long distance service is a mature industry, and simply changing the technology that is used to transmit the long distance service does not change the service. All other long-distance carriers currently pay these same access charges, and there is no authority to exempt them, regardless of the protocol used to transport such calls. To do otherwise would unreasonably discriminate between long-distance carriers utilizing IP telephony and those who do not.

Q. HAVE OTHER STATE COMMISSIONS IN BELLSOUTH'S REGION DETERMINED THAT LONG DISTANCE VOICE CALLS TRANSMITTED VIA IP TELEPHONY ARE SUBJECT TO ACCESS CHARGES?

A. Yes. In the BellSouth/Intermedia arbitration proceeding in Florida, the Florida Commission determined that phone-to-phone calls transmitted via IP telephony to which access charges would typically apply are switched access calls. The Florida Commission's August 22, 2000 Order states:

> ...phone-to-phone IP Telephony is technology neutral. A call provisioned using phone-to-phone IP Telephony but not transmitted over the internet, to which switched access charges would otherwise

apply if a different signaling and transmission protocol were employed, is nevertheless a switched access call. Except for, perhaps, calls routed over the internet, the underlying technology used to complete a call should be irrelevant to whether or not switched access charges apply. Therefore, like other telecommunications services, it would be included in the definition of switched access traffic. (Order No. PSC-00-1519-FOF-TP, page 57).

Q. WHAT IS BELLSOUTH REQUESTING THE AUTHORITY DO?

A. BellSouth requests that the Authority determine that access charges, rather than reciprocal compensation, apply to long distance calls, regardless of the technology used to transport them.

Issue 10: Should BellSouth be allowed to aggregate lines provided to multiple locations of a single customer to restrict AT&T's ability to purchase local circuit switching at UNE rates to serve any of the lines of that customer? (Attachment 2)

Q. WHAT IS THE BASIC DISPUTE BETWEEN THE PARTIES ON THIS ISSUE?

A. This issue involves the application of FCC rules regarding the exemption for unbundling local circuit switching. BellSouth, in certain geographic areas, is not required to unbundle local circuit switching for customers having four or more lines. AT&T wants to prohibit BellSouth from aggregating a customer's

lines in a specific geographic area when calculating how many lines the customer has for the purpose of determining whether unbundled local circuit switching will be available for the customer.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth believes that the FCC's position is quite clear. However, even if it were not, simple logic will lead to the conclusion that when a particular customer has four or more lines within a specific geographic area, even if those lines are spread over multiple locations, BellSouth does not have to provide unbundled local circuit switching as long as the other criteria for Rule 51.319(c)(2) are met.

Q. WHAT IS THE FCC RULE THAT IS RELEVANT TO THIS DISPUTE?

A. The relevant FCC Rule is 51.319(c)(2), which states:

(2) Notwithstanding the incumbent LEC's general duty to unbundle local circuit switching, an incumbent LEC shall not be required to unbundle local circuit switching for requesting telecommunications carriers when the requesting telecommunications carrier serves end-users with four or more voice grade (DS0) equivalents or lines, provided that the incumbent LEC provides non-discriminatory access to combinations of unbundled loops and transport (also known as the "Enhanced Extended Link") throughout Density Zone 1, and the incumbent LEC's local circuit switches are located in:

(i) The top 50 Metropolitan Statistical Areas as set forth in Appendix B of the Third Report and Order and Fourth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, and

(ii) In Density Zone 1, as defined in § 69.123 of this chapter on January 1, 1999.

Q. WHAT WAS THE FCC'S RATIONALE FOR THE "FOUR OR MORE LINES" CRITERIA IN RULE 51.319(c)(2)?

A. The FCC used the four-line cutoff to distinguish between the mass market and the medium to large business market. As long as the other criteria of Rule 51.319(c)(2) were met, the FCC determined that competitors were not impaired in their ability to serve medium to large business customers. The following portions of the UNE Remand Order demonstrate the FCC's rationale:

> 294. We recognize that a rule that removes unbundling obligations based on line count will be marginally overinclusive or underinclusive given individual factual circumstances. We find, however, that in our expert judgment, a rule that distinguishes customers with four lines or more from those with three lines or less reasonably captures the division between the mass market – where competition is nascent – and the medium and large business market – where competition is beginning to broaden.
>
> 297. In contrast, marketplace developments suggest that competitors

are not impaired in their ability to serve certain high-volume customers in the densest areas.

The FCC's logic here is that the biggest part of the consumer market involves customers who have three or fewer lines. By the time a customer has four or more lines, the customer is either a mid-sized or a large customer, and CLECs are not impaired if they don't have access to unbundled local circuit switching to address the telecommunications needs of these classes of customers. Nowhere in the rule, nor in the rationale supporting it, does the FCC suggest that the incumbent LEC still has an obligation to unbundle local circuit switching for a portion of a medium to large business customer's lines.

Q. WHAT IS THE SIGNIFICANCE OF EELS FOR THIS ISSUE?

A. Basically, the thought is that if the incumbent LEC provides EELs at UNE rates, the CLEC can haul the call anywhere in the area to the CLEC's switch. The FCC obviously concluded that, at least in the top 50 MSAs, switching is available from a number of sources. As long as the incumbent LEC allows the CLEC to have an EEL so that the end user could be connected to a CLEC's switch, it is not necessary for the incumbent LEC to unbundle local circuit switching.

Q. WHAT DOES BELLSOUTH REQUEST OF THE AUTHORITY?

A. BellSouth requests this Authority to reject AT&T's attempt to violate the

FCC's rules. CLECs are not impaired without access to unbundled local circuit switching when serving customers with four or more lines in Density Zone 1 in the top 50 MSAs. Consequently, CLECs are not entitled to unbundled local circuit switching in these areas for any of an end user's lines when the end user has four or more lines in the relevant geographic area, as long as BellSouth will provide the CLEC with EELs at UNE rates.

Issue 14: Has BellSouth provided sufficient customized routing in accordance with State and Federal law to allow it to avoid providing Operator Services/Directory Assistance ("OS/DA") as a UNE?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth witness Mr. Milner addresses the technical aspects of BellSouth's provision of customized routing and demonstrates that BellSouth is providing sufficient customized routing to allow BellSouth to avoid providing Operator Services/Directory Assistance as UNEs. The rates BellSouth will charge AT&T for its Line Class Code-based and AIN-based solutions for customized routing are being addressed by the Authority in Docket 00-00544.

Issue 16: Should the Authority or a third party commercial arbitrator resolve disputes under the Interconnection Agreement?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth's position is that the appropriate regulatory authority should resolve disputes and that BellSouth should not be precluded from petitioning the Authority for resolution of disputes under the Interconnection Agreement.

Q. WHAT IS THE BASIS FOR BELLSOUTH'S POSITION?

A. BellSouth originally agreed to use third party arbitrators to resolve disputes involving its interconnection agreements because we thought that with the state commission's crowded calendars, commercial arbitration could provide a speedy and inexpensive way to resolve disputes. Although the first interconnection agreement between BellSouth and AT&T contained an alternative dispute resolution provision, the two parties have never used that provision. However, BellSouth has used it in disputes with other CLECs. The process has proven to be neither speedy, nor inexpensive. Our experience shows that it is simply not possible to get neutral commercial arbitrators that are sufficiently experienced in the telecommunications industry. Consequently, a neutral arbitrator must be trained on the very basics of our industry, and decisions are not made expeditiously. In short, commercial arbitration simply does not work very well. The Authority and its staff are clearly more capable of handling disputes between telecommunications carriers than are commercial arbitrators. BellSouth should not be obligated to waive its right to have the Authority hear disputes.

Interestingly, although this is AT&T's issue, it evidently agrees with BellSouth's position. A "third party arbitration" clause was contained in the

parties' prior interconnection agreement. Nonetheless, AT&T filed complaints with at least two state commissions during the term of the prior agreement, rather than seeking third party arbitration. Indeed, in one instance, based on the hearing officer's initial report, AT&T asserted that third party arbitrations are too slow. Therefore, it is not at all clear to BellSouth why AT&T continues to insist on including such a clause in its interconnection agreement.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

#238599

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared John A. Ruscilli –Senior Director – State Regulatory, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 00-00079 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 49 pages and 2 exhibit(s).

John A. Ruscilli

Sworn to and subscribed
before me on 12/20/00

NOTARY PUBLIC

SUZY A. SHERWOOD
NOTARY PUBLIC
COUNTY, GEORGIA
MY COMMISSION EXPIRES
APR
28
2003

2.11 Special Access Service Conversions

2.11.1 AT&T may not convert special access services to combinations of loop and transport network elements, whether or not AT&T self-provides its entrance facilities (or obtains entrance facilities from a third party), unless AT&T uses the combination to provide a significant amount of local exchange service, in addition to exchange access service, to a particular customer. To the extent AT&T requests to convert any special access services to combinations of loop and transport network elements at UNE prices, AT&T shall provide to BellSouth a letter certifying that AT&T is providing a significant amount of local exchange service (as described in this Section) over such combinations. The certification letter shall also indicate under what local usage option AT&T seeks to qualify for conversion of special access circuits AT&T shall be deemed to be providing a significant amount of local exchange service over such combinations if one of the following options is met:

2.11.2 AT&T certifies that it is the exclusive provider of an end user's local exchange service. The loop-transport combinations must terminate at AT&T's collocation arrangement in at least one BellSouth central office. This option does not allow loop-transport combinations to be connected to BellSouth's tariffed services. Under this option, AT&T is the end user's only local service provider, and thus, is providing more than a significant amount of local exchange service. AT&T can then use the loop-transport combinations that serve the end user to carry any type of traffic, including using them to carry 100 percent interstate access traffic; or

2.11.3 AT&T certifies that it provides local exchange and exchange access service to the end user customer's premises and handles at least one third of the end user customer's local traffic measured as a percent of total end user customer local dialtone lines; and for DS1 circuits and above, at least 50 percent of the activated channels on the loop portion of the loop-transport combination have at least 5 percent local voice traffic individually, and the entire loop facility has at least 10 percent local voice traffic. When a loop-transport combination includes multiplexing, each of the individual DS1 circuits must meet this criteria. The loop-transport combination must terminate at AT&T's collocation arrangement in at least one BellSouth central office. This option does not allow loop-transport combinations to be connected to BellSouth tariffed services; or

2.11.4 The requesting carrier certifies that at least 50 percent of the

activated channels on a circuit are used to provide originating and terminating local dialtone service and at least 50 percent of the traffic on each of these local dialtone channels is local voice traffic, and that the entire loop facility has at least 33 percent local voice traffic. When a loop-transport combination includes multiplexing, each of the individual DS1 circuits must meet this criteria. This option does not allow loop-transport combinations to be connected to BellSouth's tariffed services. Under this option, collocation is not required. AT&T does not need to provide a defined portion of the end user's local service, but the active channels on any loop-transport combination, and the entire facility, must carry the amount of local exchange traffic specified in this option.

2.11.5 In addition, there may be extraordinary circumstances where AT&T is providing a significant amount of local exchange service, but does not qualify under any of the three options set forth in Section 2.11.1. In such case, AT&T may petition the FCC for a waiver of the local usage options set forth in the June 2, 2000 Order. If a waiver is granted, then upon AT&T's request the Parties shall amend this Agreement to the extent necessary to incorporate the terms of such waiver for such extraordinary circumstance.

2.11.6 BellSouth may at its sole discretion audit AT&T records in order to verify the type of traffic being transmitted over combinations of loop and transport network elements. The audit shall be conducted by a third party independent auditor, and AT&T shall be given thirty days written notice of scheduled audit. Such audit shall occur no more than one time in a calendar year, unless results of an audit find noncompliance with the significant amount of local exchange service requirement. In the event of noncompliance, AT&T shall reimburse BellSouth for the cost of the audit. If, based on its audits, BellSouth concludes that AT&T is not providing a significant amount of local exchange traffic over the combinations of loop and transport network elements, BellSouth may file a complaint with the appropriate Commission, pursuant to the dispute resolution process as set forth in the Interconnection Agreement. In the event that BellSouth prevails, BellSouth may convert such combinations of loop and transport network elements to special access services and may seek appropriate retroactive reimbursement from AT&T.

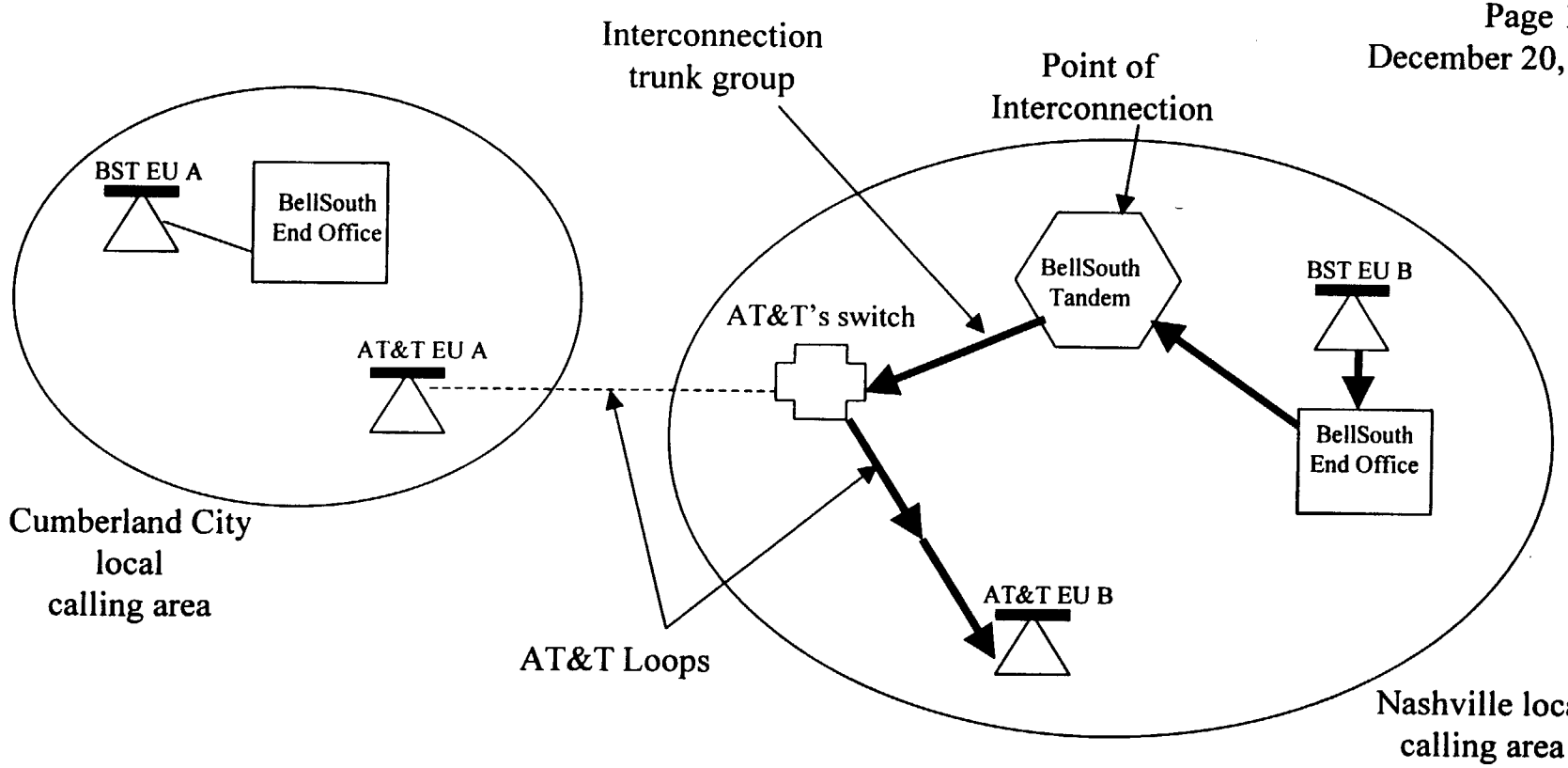
2.11.7 Conversions are subject to the termination provisions in the applicable contracts or tariffs.

2.11.8 When combinations of loop and transport network elements include multiplexing, each of the individual DS1 circuits must meet the above criteria.

2.11.9 Conversion of Service As Is

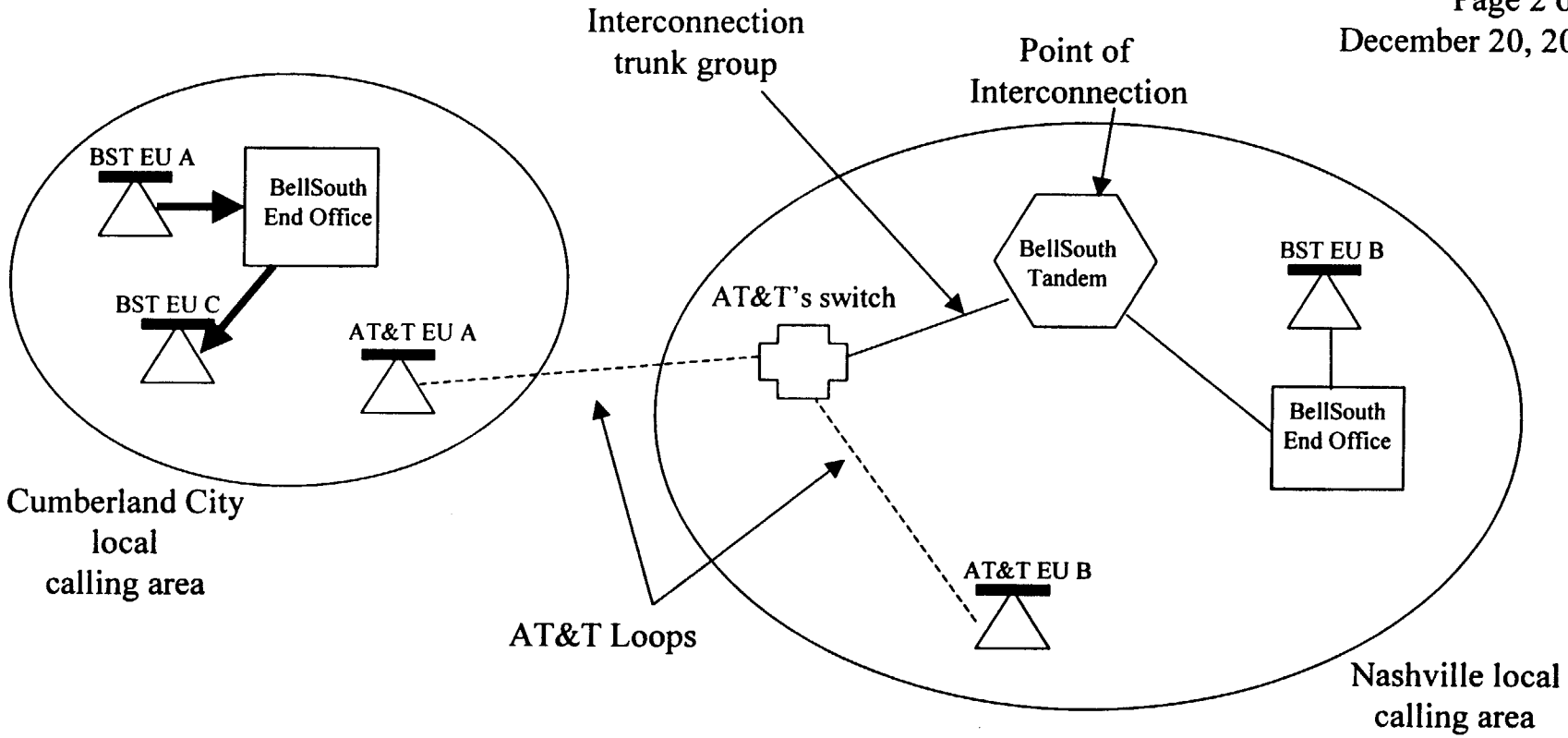
2.11.9.1 AT&T may request conversion of existing retail services to non-switched combinations of unbundled network elements by submitting an LSR or a conversion spreadsheet, provided by BellSouth, to the LCSC for record changes. For the conversion of retail services to switched combinations, AT&T may request such conversions on a single LSR for all services billed under the same Account Telephone Number or master billing account. AT&T may consolidate onto a single LSR, up to four end user accounts to a single Account Telephone Number where the accounts are for the same end user and are the same service type and end user location. BellSouth will project manage conversions of fifteen (15) or more lines.

Local Call from Nashville BST EU to Nashville AT&T EU



#238740

Local Call from Cumberland City BST EU to Cumberland City BST EU



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BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF W. KEITH MILNER

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 00-00079

DECEMBER 20, 2000

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

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present position since February 1996.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 30 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international arenas.

I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina, in 1970, with an Associate of Applied Science in Business Administration degree. I later graduated from Georgia State University in 1992 with a Master of Business Administration degree.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC SERVICE COMMISSION?

A. I have previously testified before the state Public Service Commissions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, and South Carolina, the Tennessee Regulatory Authority, and the North Carolina Utilities Commission on the issues of technical capabilities of the switching and facilities network introduction of new service offerings, expanded calling areas, unbundling, and network interconnection.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

A. In my testimony, I will address the technical aspects of network related issues which have been raised in the Petition for Arbitration filed by AT&T Communications of the Southern States, Inc. and TCG South Florida (collectively "AT&T") in this docket. Specifically, I will address the following issues, in whole or in part: Issues 8, 11, 12, 13, and 14.

Issue 8: What coordinated cutover process should be implemented to ensure accurate, reliable, and timely cutovers when a customer changes local service from BellSouth to AT&T?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. The coordinated cutover process proposed by BellSouth ensures accurate, reliable, and timely cutovers. No changes in this process are necessary or appropriate at this time.

BellSouth and AT&T agree on many aspects of how hot cuts should be performed. For example, BellSouth agrees with AT&T that the hot cut process should be well documented and that procedures should be put in place that will ensure that the process is adhered to during a cutover. As a result of recent hearings before the North Carolina Utilities Commission addressing this issue and despite agreement between BellSouth and AT&T regarding most of the steps involved in the hot cut process, there remain four areas of disagreement for which the parties need this Authority's help in resolving.

Q. WHAT ARE THE FOUR AREAS OF DISAGREEMENT BETWEEN BELLSOUTH AND AT&T REGARDING HOW HOT CUTS SHOULD BE PERFORMED?

A. The first area of disagreement deals with whether BellSouth should

check to determine that appropriate loop facilities are available before BellSouth returns a Firm Order Confirmation or "FOC" to AT&T in response to AT&T's sending its order to BellSouth. With the FOC, BellSouth provides to AT&T the date that, barring unforeseen circumstances such as facility shortages, severe weather, acts of God, manpower shortages, and the like, BellSouth will convert service from BellSouth to AT&T. No facilities check is done, and AT&T wants this changed so that BellSouth performs a facilities check before returning the FOC to AT&T.

In response, I would make two points. First, BellSouth does not perform a facilities check for its own retail customers prior to establishing a due date for the order. The process is not set up that way because there are very rare instances when facilities are not available. The additional time that would be required to do a facilities check would mean that BellSouth could not provide customers with "due dates" when they call in, but rather would have to call the customers back later, which is not what customers want. Therefore, under the present process, AT&T receives the same treatment that BellSouth's own retail units receive when an order is placed. Second, to advance the facilities check from the provisioning portion of processing an order to the "ordering" stage, which is what AT&T proposes, would delay the transmission of the FOC which AT&T needs in order to confirm due dates with its end user and to schedule its own resources needed for the cutover. I believe the existing process

strikes a balance between the need for timely FOC production against the few instances where facilities are not immediately available.

The second area of disagreement concerns what BellSouth should do in response to an error in the database that keeps records of Connecting Facilities Assignments or "CFAs". As the name implies, connecting facilities are the cables between BellSouth's distributing frame and AT&T's collocation arrangement in a given central office. The dispute here is simple. When AT&T sends an order to BellSouth, AT&T dictates which of the connecting facilities BellSouth is to use to connect a particular customer's loop to AT&T's collocation arrangement. When an order is placed and BellSouth finds that AT&T has made an error, such that the designated connecting facility is not available to be used to work the order AT&T has assigned it to, BellSouth asks AT&T for a clarification. BellSouth asks for a clarification from AT&T because the order cannot be worked until the conflict is resolved and only AT&T knows what action it wants to take (for example, to use a different cable pair or disconnect the first pair) in order to resolve the discrepancy.

On the other hand, instead of its order being returned for clarification when BellSouth finds that AT&T has made an error, AT&T wants BellSouth to notify AT&T that the order is in a jeopardy condition. The difference is significant. If a clarification is requested, AT&T must resubmit the order. If BellSouth issues a "jeopardy" notice, which

generally means something has gone wrong and it is BellSouth's responsibility, the order holds its place in queue while BellSouth attempts to resolve the issue. Obviously AT&T would rather have the order hold its place, rather than resubmitting the order.

However, BellSouth's mechanized systems do not allow for such jeopardy notification of errors in AT&T's order. Further, even if BellSouth's operations systems could treat AT&T's errors as jeopardy conditions rather than clarifications, the net effect would be delays in fulfilling the requests of other local service providers since BellSouth would have to keep resources committed to AT&T's order until AT&T resolved the jeopardy condition. I would note that a situation involving CFA database discrepancies is the only situation of which I am aware that could cause a clarification to be sent to AT&T after the FOC has been sent to AT&T.

The third area of disagreement deals with when, before the cutover, BellSouth is to call AT&T so that the final decision of whether to proceed with the cutover can be made. BellSouth commits to contacting AT&T 24 to 48 hours in advance of the cut to verify the cutover time and to verify AT&T's readiness to convert the customer's service as ordered. AT&T wants that call to always be made at 48 hours before the cutover. BellSouth's position is that the call should be made in the window of 24 to 48 hours before the cutover because BellSouth does not always know with certainty 48 hours prior to the

cutover whether all required steps leading up to the actual cutover can be completed in time. In other words, AT&T's proposal would require the parties to decide 48 hours in advance whether to go forward with the cutover. BellSouth's proposal would give the parties more time and latitude to continue working on any remaining work steps so the cutover can go forward as originally scheduled. BellSouth is willing to agree with AT&T to make the 48 hour call, and to make a go/no go decision, provided that BellSouth is not charged with any due date misses as a result of making such a call. Our point is, of course, that if the cut is ready to go, then we will make the 48 hour call anyway. If it is not ready to go, it is still possible that BellSouth could resolve whatever jeopardy that existed within the 24 hours after the 48 hour call and before the 24 hour call. Since AT&T would take this period away from BellSouth, it is not fair to charge BellSouth with due date misses that could have been avoided, but for AT&T's insistence on a call.

The fourth area of disagreement deals with the manner in which BellSouth notifies AT&T that the cutover is complete. Based on the testimony of AT&T's witness Mills in North Carolina, it appears that the parties may have resolved this part of the dispute. My understanding of Mr. Mills' testimony is that AT&T is willing to provide an 800 number for BellSouth's use in closing out AT&T's hot cut orders and that the 800 number will be staffed such that BellSouth's calls will not be routed to a voicemail system. At times, when attempting to close out an order

to AT&T, BellSouth has had difficulty reaching technicians in AT&T's work centers. When this occurred, BellSouth's calls were routed to a voicemail system where the BellSouth technician left a message. BellSouth agrees this part of this issue can be resolved once AT&T provides such an 800 number to BellSouth. BellSouth is willing to call the 800 number to close out AT&T's hot cut orders.

Q. EVEN THOUGH THE FOUR REMAINING ISSUES SEEM STRAIGHTFORWARD, CAN YOU PROVIDE THIS AUTHORITY WITH SOME IDEA OF WHAT IS INVOLVED IN PERFORMING A LOOP CUTOVER.

A. Yes. I have provided Exhibit WKM-1 that shows, pictorially and with a brief narrative, the various work steps involved in a typical loop cutover. These photographs were taken in BellSouth's Norcross, Georgia, central office; however, the work steps are identical in all nine states in BellSouth's region. Briefly, the work steps involved are as follows:

- The BellSouth central office technician receives a call to begin cutover and asks for the cable pair number of the loop to be cutover. This is shown on page 1 of Exhibit WKM-1.
- The technician types the cable pair number into a database to find the loop cutover work order number. This is shown on page 2 of Exhibit WKM-1.
- The technician retrieves a copy of the work order for the unbundled

loop. This is shown on page 3 of Exhibit WKM-1.

- The technician in the BellSouth central office responds to the BellSouth UNE Center's request to initiate coordination of the overall cutover of service from BellSouth to the CLEC. This is shown on page 4 of Exhibit WKM-1.
- The technician then verifies that the correct loop has been identified for cutover. This is done using a capability referred to as Automatic Number Announcement Circuit ("ANAC"). The technician attaches a test set onto the loop and dials a special code. The telephone number associated with that loop is played audibly. This is shown on page 5 of Exhibit WKM-1.
- Next, the technician locates the existing jumper on the BellSouth Main Distributing Frame ("MDF") running between the loop and the BellSouth switch port. This is shown on pages 6-7 of Exhibit WKM-1.
- The technician locates and removes the end of the jumper connected to the BellSouth cable pair. This is shown on page 8 of Exhibit WKM-1.
- The technician then locates and removes the end of the jumper connected to the BellSouth switching equipment. This is shown on page 9 of Exhibit WKM-1.
- The technician then connects the one end of a new jumper between the loop and a connector block on a cable rack with tie cables to the CLEC's collocation arrangement. This is shown on page 10 of Exhibit WKM-1.

- The technician then weaves the new jumper wire through the cable rack to reach the tie cables to the CLEC's collocation arrangement. This is shown on page 11 of Exhibit WKM-1.
- The technician connects the second end of the new jumper to the connector block and thus the tie cable to the CLEC's collocation equipment. This is shown on page 12 of Exhibit WKM-1.
- The technician next verifies that the loop is connected to the expected switch port and telephone number in the CLEC's switch, again using ANAC capabilities. This is shown on page 13 of Exhibit WKM-1
- Upon successful completion of the loop cutover, the technician verifies with the CLEC that the order was correctly worked, closes the work order, and notifies the UNE Center. This is shown on page 14 of Exhibit WKM-1.

Naturally, any errors (both BellSouth's errors and the CLEC's errors) slow the process while corrections are identified and made. While BellSouth should clearly be responsible for its own errors, it should not be held responsible for delayed cutovers due to problems or errors caused by the CLEC. It is obvious from the many steps that have to be taken to correctly perform a loop cutover that the timeframe appropriate for a single loop would not be a reasonable timeframe for a multiple loop cutover for a large end-user such as a major bank or manufacturing firm as most of the individual work steps must be repeated for each loop to be converted.

Q. IS BELLSOUTH IN TOTAL CONTROL OF THE LOOP CUTOVER PROCESS?

A. No. As discussed above, loop cutovers require high levels of coordination between BellSouth and the CLEC to which the unbundled loop is being provided. If a CLEC fails to perform a function in a timely fashion, the delay directly impacts the overall cutover time. Therefore, any measurement of average loop cutover times will reflect not only the efficiency of BellSouth's systems and employees' skills, but also the efficiency of the CLEC's systems and employees' skills. For example, one step in the process occurs after the loop is removed from BellSouth's switch and is connected to the CLEC's switch. At this point in the cutover, tests are performed to verify that the loop is connected to the expected switch port and telephone number in the CLEC's switch. However, if the CLEC has a defective switch port, or has provided an invalid switch port number, or any of a number of other possible errors occurs, BellSouth is powerless to move forward until the CLEC takes appropriate corrective steps. While the CLEC is doing so, the total cutover time clock is still running. Thus, while BellSouth strives to complete loop cutovers in as timely and effective a manner as possible, BellSouth cannot be saddled with the entire responsibility for meeting the stated interval, especially given the CLEC's contribution to total cutover time.

Q. WHAT EFFECT OR IMPACT DOES BELLSOUTH'S HOT CUT PROCESS HAVE ON CUSTOMERS WANTING TO CHANGE THEIR LOCAL SERVICE TO AT&T?

A. A customer may experience service outage if either service provider fails to follow a rational and consistent process for converting live service. However, this is not the norm nor has BellSouth exhibited a pattern of failure that has resulted in the level of service outage alleged to have been experienced by AT&T end users.

BellSouth uses a very detailed process for conversion of live local service and uses these same procedures across the region for all CLECs with a high level of success.

Q. WHAT HAS BELLSOUTH PROVIDED TO AT&T REGARDING BELLSOUTH'S HOT CUT PROCEDURES?

A. BellSouth and AT&T have created a detailed flow chart depicting the entire process. This process flow is attached to this testimony as Exhibit WKM-2. This information was shared with AT&T on May 14, 1999, and AT&T concurred on June 9, 1999, that this was an accurate depiction of the process. BellSouth has met with AT&T on many occasions to discuss and answer questions regarding the procedures utilized. When AT&T converted to Electronic Data Interchange (EDI) for its coordinated hot cut orders, the flow chart was revised to reflect

the electronic order flow. This revised process flow is depicted on Exhibit WKM-3 which is attached to this testimony and was provided to AT&T on April 26, 2000. BellSouth has recently modified its flow charts to more accurately depict the appropriate BellSouth work group performing a given function. These changes were minor modifications and do not change the scope of BellSouth's pre-conversion, conversion or post-conversion responsibilities. These changes reflect only processes internal to BellSouth so the changes do not alter the interactions between BellSouth and AT&T. This last process flow is depicted in Exhibit WKM-4 which is attached to this testimony and has been discussed with AT&T. I agree that continual process improvement is good business practice. Process improvements have been and likely will continue to be discovered and put into day-to-day practice. However, what I do not agree with is that BellSouth's practices are inadequate or that AT&T's proposed processes are an improvement on BellSouth's processes for the reasons I pointed out earlier.

Q. HAS BELLSOUTH PROPOSED CONTRACT LANGUAGE INCORPORATING THIS PROCESS FLOW?

A. Yes. BellSouth has proposed language in the current ongoing contract negotiations with AT&T which supports these detailed process flows and provides additional support of BellSouth's commitment to provide coordinated conversions to AT&T which afford a meaningful

opportunity to compete for local service.

BellSouth's processes provide for a conversion, which should ensure a smooth transition for an end user electing to change local service providers from BellSouth to AT&T with minimal end user service interruption.

Q. HAS BELLSOUTH DEVELOPED METHODS AND PROCEDURES (M&Ps) FOR ITS PROCESS FLOW?

A. Yes. BellSouth's M&Ps are attached to this testimony as Exhibit WKM-5 and address the following:

- BellSouth's processes when AT&T orders a coordinated conversion and whether they want to set the conversion time for an offered day or whether they elect to have the time mutually agreed to prior to conversion.
- BellSouth's requirements to contact AT&T at any point in the provisioning process where a jeopardy condition might result in a conversion delay.
- BellSouth's commitment to contact AT&T 24 to 48 hours in advance of the cut depending on the interval for the service ordered, to negotiate a non-time-specific conversion and/or to verify AT&T's readiness to convert the customer's service as ordered.
- BellSouth's testing responsibilities prior to conversion as well as on the conversion date to ensure the conversion is completed

successfully.

- BellSouth's willingness to notify and cooperatively work with AT&T to correct any wiring defects which BellSouth identifies while performing pre-testing activities whether the fault appears to be in BellSouth's or AT&T's equipment.
- AT&T's ability to accept or reject the completion of a conversion prior to BellSouth completing the service request and BellSouth's obligation to timely notification to AT&T for the porting of telephone numbers.

Q. HOW DOES BELLSOUTH'S CONFIRMATION PROVIDE AT&T WITH A COMMITMENT FROM BELLSOUTH THAT THE HOT CUT WILL BE PERFORMED AT THE REQUESTED TIME?

A. BellSouth provides two options to AT&T that I believe allow AT&T the flexibility to meet AT&T's business needs. With the first option, AT&T can set a time for a loop conversion by ordering and paying for time specific order coordination. With this option, BellSouth commits to use best efforts to complete the conversion as specified by AT&T at the ordered time and by the offered date. If unforeseen circumstances occur during the provisioning process which may cause the date or time of the conversion to be in jeopardy, BellSouth notifies AT&T as soon as the jeopardy is identified to allow AT&T to respond to its customer as appropriate.

However, If AT&T elects not to order via the first option (that is, time specific order coordination) AT&T may request order coordination from BellSouth. This second option provides for BellSouth and AT&T to mutually agree on the conversion time 24 to 48 hours in advance of the conversion. Again, if unforeseen circumstances occur that may jeopardize BellSouth's ability to perform the conversion, BellSouth notifies AT&T as soon as the jeopardy is identified.

Q. PLEASE EXPLAIN THE PROCESS ASSOCIATED WITH MAINTAINING THE CONNECTING FACILITY ASSIGNMENT (CFA) DATABASE.

A BellSouth provides AT&T with the connecting facility assignments (that is, cable and pair assignments for the cable between AT&T's collocation arrangement and BellSouth's equipment such as distributing frames or cross-connect bays) assigned to AT&T at the time AT&T's collocation arrangement is made available. AT&T is required to maintain its own connecting facility assignment records, just as all other CLECs are required to do, and assign each pair that AT&T wants BellSouth to use in order to connect BellSouth's facilities to AT&T's facilities. In a case where BellSouth's processing of an AT&T order identifies an error (for example, AT&T's order shows an assignment for a CFA cable pair that is already working), BellSouth sends a clarification request back to AT&T. This is because the order cannot be worked until the conflict is resolved and only AT&T knows

what action it wants to take (for example, to use a different cable pair or disconnect the first pair) in order to resolve the discrepancy.

Q. HAS BELLSOUTH INVESTIGATED CLAIMS BY AT&T THAT THE CONNECTING FACILITY ASSIGNMENT DATABASE IS NOT CURRENT?

A. Yes. BellSouth has performed audits for AT&T at no charge to reconcile AT&T's records. The findings were that the BellSouth database was correct for 95% of the more than 3,400 AT&T assignments and that AT&T's records were incorrect for 74% of the assignments. I have attached as Exhibit WKM-6, BellSouth's response to AT&T dated February 28, 2000, regarding this audit. Please note that AT&T itself shares a responsibility in keeping the database by accurately informing BellSouth of the facility assignments it expects BellSouth to use. AT&T, at its discretion, could verify by physical inspection at its collocation arrangement, the facility assignments it is assigning to BellSouth and thus minimize or eliminate this source of database inaccuracy.

Q. WHAT SOLUTION TO THIS ISSUE DOES BELLSOUTH PROPOSE?

A. This Authority should affirm that BellSouth uses a very detailed process for conversion of live local service and that no changes in the process are necessary. These same procedures are used with a high

level of success across the region for all CLECs. BellSouth has proposed language that supports these detailed process flows and provides additional support of BellSouth's commitment to provide coordinated conversions to AT&T which afford a meaningful opportunity for AT&T to compete for local service. BellSouth's processes provide for a conversion that should ensure a smooth transition for an end user electing to change local service providers from BellSouth to AT&T with minimal end user service interruption.

Issue 11: What are the appropriate intervals for the delivery of collocation space to AT&T?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. Previously, BellSouth has offered to provision caged and cageless physical collocation arrangements within 90 calendar days from its receipt of an application unless the CLEC misses its seven-day interval for responding with a bona fide order. If the CLEC misses its seven-day response interval, then the 90 calendar day interval is measured from the date of the CLEC's bona fide order. Under extraordinary circumstances and absent agreement by the parties to a longer provisioning interval, where BellSouth is unable to complete the provisioning work within 90 calendar days, BellSouth will seek a waiver from this Authority to extend the provisioning interval beyond 90 calendar days. BellSouth has proposed that it will provision virtual

collocation arrangements within 50 calendar days in ordinary circumstances and within 75 calendar days for extraordinary circumstances.

BellSouth has reevaluated its collocation provisioning intervals and processes and is amending its position with respect to the issues addressing physical collocation intervals. Whereas previously, BellSouth has proposed a standard provisioning interval for collocation, BellSouth has now evaluated the benefits to both CLECs and BellSouth of CLEC-provided forecasts. As the Authority is aware, the issue of intervals for cageless collocation was considered in the context of the DeltaCom arbitration; however, the issue of CLEC-provided forecasts was not evaluated by the Authority or included in the Authority's determination of the appropriate interval for cageless collocation. BellSouth asks that this Authority consider these collocation issues in light of recent FCC rulings. This proposal incorporates the economies achieved by CLEC-forecasting of their collocation needs and the FCC has expressly approved such an approach.

Q. PLEASE DISCUSS THE FCC'S PROPOSAL FOR COLLOCATION PROVISIONING INTERVALS.

A. In its collocation reconsideration order, FCC 00-297, the FCC set a national default standard of 90 calendar days for provisioning

collocation space. In that order, the FCC acknowledged the benefits of CLEC-provided forecasts by authorizing ILECs to require CLECs to provide forecasts of their collocation needs. At that time, the FCC did not provide the ILECs with any remedies for inaccurate forecasts or for a CLEC's failure to provide a forecast, preferring to leave such issues to the state commissions to address. See paragraph 39 of that Order. However, in a subsequent decision, DA 00-2528, issued November 7, 2000, the FCC granted Verizon's, SBC's, and Qwest's requests for conditional waivers of the 90-day provisioning interval. In that order, the FCC acknowledged that it had now been presented with a more comprehensive record upon which to base its decision and that "this greatly expanded record countenances a moment of pause before we insist on absolute compliance with that Order". See paragraph 10 of that Order. The FCC went on to expressly endorse the intervals ordered by the New York Commission for Verizon, with one minor modification. These intervals incorporate specific CLEC forecasting requirements.

Q. WHAT IS BELLSOUTH'S REACTION TO THE FCC'S RECENT ACTION YOU HAVE JUST DESCRIBED?

A. In reviewing the intervals and process adopted by the New York Commission, BellSouth believes that two major benefits can be achieved: First, CLECs will benefit from the reduced intervals made possible by the provision of CLEC forecasts. Second, BellSouth will be

able to more effectively and more efficiently allocate its resources to the locations where the CLECs, through their forecasts, are requesting space.

Q. HAS BELLSOUTH TAKEN ANY REGULATORY ACTION WITH REGARD TO THE FCC'S RECENT DECISION?

A. Yes. BellSouth has filed a request with the FCC for authority to apply the New York ordered intervals, as modified by the FCC. This request is pending before the FCC. BellSouth is now requesting that this Authority consider the efficiencies obtained through CLEC-provided forecasts and adopt the proposed intervals, which are supported by the FCC as promoting facilities-based competition. BellSouth proposes the intervals for physical collocation found in Verizon's collocation tariff for New York. Accordingly, it is BellSouth's belief that this Authority should order the collocation intervals contained in Verizon's collocation tariff for New York.

Issue 12: When AT&T and BellSouth have adjoining facilities in a building outside BellSouth's central office, should AT&T be able to purchase cross-connect facilities to connect to BellSouth or other CLEC networks without having to collocate in BellSouth's portion of the building?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. AT&T's proposal has the effect of expanding the definition of premises beyond that which is required by the FCC regulations or that which is necessary. AT&T simply wishes to take advantage of its former corporate ownership of BellSouth. BellSouth's agreement to AT&T's terms would cause BellSouth to provide AT&T with more favorable treatment than to other local service providers. AT&T has suggested that it use cross connects between its equipment in AT&T's premises with BellSouth's equipment in the BellSouth central office. The type building AT&T is referring to might be thought of as a condominium arrangement because AT&T's part and BellSouth's part adjoin each other and sometimes have special conduits or other structures between the two parts. However, AT&T's part of the building is not part of BellSouth's premises. So what AT&T is really asking for is a new form of interconnection which only AT&T could use since only BellSouth and AT&T have this situation. However, the recent decision by the United States Court of Appeals for the District of Columbia Circuit (Argued February 2, 2000, Decided March 17, 2000, No. 99-1176) addresses the issue of ILEC obligations to provide cross-connects and held that ILECs are required to provide collocation so long as that collocation was on the ILEC's premises. Following is the text from that decision regarding cross connects:

> One clear example of a problem that is raised by the breadth of the Collocation Order's interpretation of "neces-

sary" is seen in the Commission's rule requiring LECs to allow collocating competitors to interconnect their equipment with other collocating carriers. See Collocation Order, 14 FCC Rcd at 4780 p 33 ("We see no reason for the incumbent LEC to refuse to permit the collocating carriers to cross-connect their equipment, subject only to the same reasonable safety requirements that the incumbent LEC imposes on its own equipment."). The obvious problem with this rule is that the cross-connects requirement imposes an obligation on LECs that has no apparent basis in the statute. Section 251(c)(6) is focused solely on connecting new competitors to LECs' networks. In fact, the Commission does not even attempt to show that cross-connects are in any sense "necessary for interconnection or access to unbundled network elements." Rather, the Commission is almost cavalier in suggesting that cross-connects are efficient and therefore justified under s 251(c)(6). This will not do. The statute requires LECs to provide physical collocation of equipment as "necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier," and nothing more. As the Supreme Court made clear in Iowa Utilities Board, the FCC cannot reasonably blind itself to statutory terms in the name of efficiency. Chevron deference does not bow to such unbridled agency action. [Emphasis added]

Q. HOW DID THE RECENT CIRCUIT COURT DECISION ADDRESS COLLOCATION ON LEC'S PROPERTY?

A. Following is the text from the decision by the United States Court of Appeals for the District of Columbia Circuit:

> The FCC offers no good reason to explain why a competitor, as opposed to the LEC, should choose where to establish collocation on the LEC's' property; nor is there any good explanation of why LECs are forbidden from requiring competitors to use separate entrances to access their own equipment; nor is there any reasonable justification for the rule prohibiting LECs from requiring competitors to use separate or isolated rooms or floors. It is one thing to say that LECs are forbidden from imposing unreasonable minimum space requirements on competitors; it is quite another thing, however, to say that competitors, over the objection of LEC property owners, are free to pick and choose preferred space on the LECs' premises, subject only to technically feasibility. There is nothing in s251(c)(6) that endorses this approach. The statute requires only that the LECs reasonably provide space for "physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier," nothing more.

Even if the FCC were to find that cross-connects are "necessary for interconnection or access to unbundled network elements", it is clear to me that such a requirement that BellSouth provide cross-connects is limited to the situation where a CLEC such as AT&T is collocated within the BellSouth premise. My reading of the Circuit Court's decision in no way creates a requirement that BellSouth provide AT&T with cross-connects in lieu of other forms of interconnection between AT&T's network and BellSouth's network.

Issue 13: Is conducting a statewide investigation of criminal history records for each AT&T employee or agent being considered to work on a BellSouth premises a security measure that BellSouth may impose on AT&T?

Q. WHAT IS YOUR UNDERSTANDING OF THE DISPUTE BETWEEN BELLSOUTH AND AT&T IN ISSUE 13?

A. AT&T and BellSouth disagree as to what security measures are necessary to protect BellSouth's network when AT&T's employees or agents are given unescorted access to BellSouth's premises.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth performs criminal background checks on its employees prior

to hiring. AT&T should do the same in order for AT&T's employees or agents who enjoy unescorted access to BellSouth's central offices and other premises. Such security requirements are reasonable in light of the impact on public safety and the assets being protected as well as the number of new entrants and other telecommunications carriers who rely on the integrity and reliability of BellSouth's network. AT&T's offer to indemnify BellSouth for bodily injury or property damage is not sufficient in light of the asset at risk. Indemnification is an after the fact solution. By requiring criminal background investigations, BellSouth is seeking to protect the consumer and other CLECs up front from the incumbent risks.

BellSouth is willing to agree that it would be acceptable whereby any employees hired by AT&T prior to January 1, 1995, would not be required to have criminal background checks. That is, of course, assuming AT&T assures BellSouth of no criminal activity on the part of the employee since that time.

Q. DESCRIBE THE SPECIFIC SECURITY CHECKS BELLSOUTH REQUIRES OF ITS EMPLOYEES, VENDORS, AND OTHER AGENTS THAT ARE IN EFFECT TODAY.

A. BellSouth requires a seven (7) year criminal background check for all of its employees prior to hiring, and a five (5) year criminal background check for vendors and agents.

Q. ARE THERE ANY OTHER SPECIFIC REQUIREMENTS THAT THE CLEC SHOULD CONSIDER WHEN ASSIGNING VENDORS AND AGENTS TO BELLSOUTH'S PREMISES?

A. Yes. The CLEC should not knowingly assign to BellSouth's premises any individual who is a former employee of BellSouth and whose employment with BellSouth was terminated for a criminal offense whether or not BellSouth sought prosecution of the individual for the criminal offense.

Also, the CLEC should not knowingly assign to BellSouth's premises any individual who is a former contractor of BellSouth and whose access to BellSouth's premises was revoked due to commission of a criminal offense whether or not BellSouth sought prosecution of the individual for the criminal offense.

Q. DOES BELLSOUTH MEET THE FCC's REQUIREMENT THAT PERMITS COLLOCATORS DIRECT ACCESS TO ITS EQUIPMENT WITHOUT BEING ESCORTED BY BELLSOUTH PERSONNEL AND WITHOUT THE COLLOCATOR'S EQUIPMENT BEING PHYSICALLY SEPARATED BY A WALL OR OTHER STRUCTURE FROM BELLSOUTH'S EQUIPMENT OR THE EQUIPMENT OF OTHER CLECs?

A. Yes. However, the FCC's Order raises serious concerns that must be addressed in order to retain the level of network reliability and security that currently exists and which end users and regulators have come to expect. BellSouth has addressed those concerns and is compliant with the FCC's requirements. A simple reading of today's newspaper headlines reveals the need for stringent control over the access to and operation of the public telephone network. In order to provide reasonable security measures, BellSouth requires that all collocators' employees and agents undergo the same level of security training, or its equivalent, that BellSouth's own employees, or third party contractors providing similar functions, must undergo. Each collocator must provide its employees and agents with picture identification, which must be worn and be visible in the collocation space or other areas in and around BellSouth's central offices. In its Order, the FCC permitted incumbent LECs to impose security arrangements that are as stringent as the security arrangements the incumbent LEC maintains at its premises for its own employees. BellSouth is not requiring CLECs to perform a seven (7) year criminal background investigation, as it does for its own employees. Rather, BellSouth requires only a five (5) year criminal background check of BellSouth's vendors and agents and for collocators' employees or agents. Under BellSouth's proposal, collocators are required to conduct an investigation of criminal history records for each of the collocator's employees and agents being considered for work within or upon BellSouth's premises. Restrictions are imposed on a collocator's

employees or agents with felony or misdemeanor criminal convictions. Also, the FCC's Order provides for additional security measures such as allowing BellSouth to provide a cage around its own equipment. Thus, BellSouth is in compliance with the security provisions required by the FCC's Order.

Q. DOES BELLSOUTH REQUIRE THAT AT&T PERFORM SECURITY CHECKS OF ALL ITS EMPLOYEES?

A. No. BellSouth is indifferent to the security measures and background checks AT&T makes for its employees to access its own buildings. However, BellSouth is rightly concerned for proper security measures and background criminal checks for those of AT&T's employees for which AT&T wants unescorted access to BellSouth's premises. If AT&T doesn't want to perform background criminal checks of all of its employees, it need only check those of its employees it wants admitted to BellSouth's premises.

Q. IS THE CRIMINAL BACKGROUND CHECK PROPOSED BY BELLSOUTH EFFECTIVE IN LIMITING OR RESTRICTING A WORKER FROM HARMING OR DAMAGING PROPERTY?

A. Yes. Criminal background checks are a reasonable way to prevent known criminals from even being in a place where they could cause harm or damage to BellSouth's or a CLEC's network.

Q. DOES BELLSOUTH'S PROPOSAL IMPOSE DISCRIMINATORY SECURITY REQUIREMENTS ON AT&T THAT IT DOES NOT IMPOSE ON ITSELF?

A. No. ILECs such as BellSouth are entitled under the FCC's order to "impose reasonable security arrangements to protect their equipment and ensure network security and reliability." Advanced Services Order at paragraph 46. That is all BellSouth's policy is meant to do. BellSouth believes a simple reading of today's newspaper headlines is sufficient to underscore the public's need for secure, reliable communications. BellSouth's security policies are a reasonable balance between giving CLECs unfettered access to BellSouth's premises while maintaining network reliability and security.

Issue 14: Has BellSouth provided sufficient customized routing in accordance with State and Federal law to allow it to avoid providing Operator Services/Directory Assistance ("OS/DA") as a UNE?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth has available both an Advanced Intelligent Network (AIN) solution for customized routing as well as the Line Class Code (LCC) solution that was advocated by AT&T during the last round of arbitrations. Thus, BellSouth has met its requirement to provide

customized routing and as a result is not obligated to provide access to operator services and directory assistance at UNE rates.

Q. WHAT DO THE FCC RULES SAY ABOUT ACCESS TO OPERATOR SERVICES AND DIRECTORY ASSISTANCE?

A. The FCC's Rule 319(f) makes clear that BellSouth is not required to provide access to operator services and directory assistance where it provides CLECs "with customized routing or a compatible signaling protocol."

Q. WHAT IS CUSTOMIZED ROUTING?

A. Customized routing (which has also been referred to as selective routing) allows calls from a CLEC's customers served by a BellSouth switch to reach the CLEC's choice of operator service or directory assistance service platforms instead of BellSouth's operator service and directory assistance service platforms. Customized routing can be provided when a CLEC acquires unbundled local switching from BellSouth or resells BellSouth's local exchange services.

Q. BRIEFLY DESCRIBE THE METHODS AVAILABLE FOR CUSTOMIZED ROUTING.

A. The first method of providing customized routing that BellSouth has

made available is the Line Class Code (LCC) method. The LCC method makes use of translations and routing capabilities in the end office switch. Availability of customized routing capability using LCCs is offered on a first-come, first-served basis. To date, BellSouth has not denied any request for selective routing based on lack of LCC capacity.

Q. IS THERE A LIMITATION ON THE AVAILABILITY OF CUSTOMIZED ROUTING FOR CLECs?

A. No. Although BellSouth originally believed (based on representations by AT&T and other CLECs) that CLEC demands for customized routing would exhaust available LCCs, demands to date do not suggest imminent risk of exhaustion of LCCs. However, even were that to occur (which I do not believe will in fact occur), the AIN solution discussed below would still be available. The AIN method eliminates any potential exhaust concerns about the LCC method of customized routing.

Q. PLEASE DESCRIBE THE SECOND METHOD BY WHICH BELLSOUTH PROVIDES CUSTOMIZED ROUTING.

A. The second method for providing customized routing is through the use of BellSouth's AIN platform. This method uses a centralized database, which is queried during call processing to determine the

CLEC's desired routing for that call. A technical trial of customized routing using BellSouth's AIN platform commenced in Louisiana, in August 1998, and was successfully completed in September 1998. A second trial commenced from May 1999 and successfully completed in August 1999.

The AIN method for customized routing is available to ALECs in addition to the LCC method. BellSouth has completed work on enhancements to its AIN Service Management System (SMS) which will facilitate CLEC's creating and updating routing information for the CLEC's end user customers. BellSouth has completed end-to-end call through testing (ETET) of this enhancement. The availability of this method was posted on BellSouth's web site (http://www.interconnection.bellsouth.com/products/UNE/ainscr.pdf) on October 23, 2000.

By providing CLECs a choice of methods, BellSouth better enables CLECs to compete based upon their own business plans and priorities.

Q. ARE BOTH METHODS PROPOSED BY BELLSOUTH AVAILABLE TODAY?

A. Yes. Both the LCC method and the AIN method are available today. The LCC method is available to CLECs in addition to BellSouth's AIN version and both have been tested and proved workable. If AT&T

wants to use the LCC method, it merely needs to order it. Insofar as tests are concerned, AT&T itself participated in cooperative testing of BellSouth's AIN method for customized routing in 1997. Later BellSouth offered to do a trial of the AIN method in Louisiana yet not one CLEC, not even AT&T, showed the slightest interest in being part of that trial. As with the LCC method, if AT&T wants to use the AIN method, it merely needs to order it.

Q. USING THE AIN SOLUTION, WOULD POST-DIALING DELAY DURING CALL SETUP CREATE A CONCERN?

A. No. First of all, post dialing delay is the time between when the end user finishes dialing and when the customer is informed (via ringing signal, busy tone or the like) of the call's progress. All switching systems take some time to translate the dialed digits, select an appropriate trunk group and the like, and all these functions contribute to post dialing delay. So, post dialing delay is not a consequence of BellSouth's AIN customized routing solution. With the AIN solution, a computer database is queried during call processing to determine the CLEC's preferred routing for a particular end user. This database query takes time and thus adds a small incremental bit of post dialing delay to the overall processing of the call. Second, BellSouth believes the post dialing delay will be only about one second. Third, if AT&T is concerned with even that small an amount of post dialing delay, AT&T can simply request the Line Class Code method and thereby eliminate

its concerns for post dialing delay.

Q. WHY DOES BELLSOUTH CHOOSE TO PERFORM THE DATABASE QUERY FROM THE AIN HUB RATHER THAN FROM EACH AND EVERY END OFFICE SWITCH?

A. The AIN method of customized routing allows the use of the AIN "hub" concept, which yields several advantages as follows:

- Allows the use of appropriate AIN "triggers" for all call types rather than only a limited set of call types.
- Allows even those end office switches that are not AIN-capable to use the AIN customized routing solution.
- Optimizes the use of shared trunk groups by allowing the carriage of customized routing traffic over common trunk groups between the end office switch and the AIN hub.

Thus, the AIN hubbing arrangement allows the use of the AIN method in all switches, even those that are not AIN capable. Also, the AIN hubbing arrangement allows some sharing of common trunk groups that other CLECs have stated they prefer.

Q. HAS BELLSOUTH PROVIDED SUFFICIENT INFORMATION SUCH AS ORDERING INSTRUCTIONS AND SUPPORTING DOCUMENTATION TO AT&T FOR EACH OF THE CUSTOMIZED ROUTING OPTIONS THAT BELLSOUTH WILL PROVIDE?

A. BellSouth has provided AT&T with a proposed contract language addition for procedures for customized routing. (Attachment 7, Section 3.20 et seq.) This proposed language will provide specific ordering procedures and documentation as requested by AT&T. If AT&T wants the Line Class Code method of customized routing because AT&T prefers it over the AIN method, AT&T should simply order the Line Class Code method which is and has long been available to it.

Q. DOES BELLSOUTH HAVE AN OBLIGATION TO ROUTE OS/DA CALLS USING EXISTING TANDEM ARCHITECTURE?

A. No. BellSouth has no obligation to route AT&T's operator services and directory assistance traffic differently than BellSouth routes its own operator services and directory assistance traffic. I am unaware of any requirement that BellSouth route a CLEC's operator services and directory assistance traffic via tandem. Further, that is not how BellSouth routes its own operator services and directory assistance traffic. Instead, BellSouth uses direct trunk groups between BellSouth's end office switches and BellSouth's operator services and directory assistance platforms. However, upon request BellSouth will provide unbundled tandem switching to AT&T and AT&T can use that capability as it chooses, subject only to the technical capabilities of the tandem switch.

Q. DOES BELLSOUTH HAVE AN OBLIGATION THAT ITS CUSTOMIZED ROUTING ARCHITECTURE MUST BE FULLY IMPLEMENTED AND AVAILABLE IN EVERY END OFFICE WHERE TECHNICALLY FEASIBLE?

A. No. It would not be a wise decision for BellSouth to spend money to equip each and every one of its end office switches for customized routing on the chance that a CLEC, such as AT&T, might someday order customized routing. BellSouth has no obligation to spend its money in such a way. If, on the other hand, a CLEC, such as AT&T, requests customized routing in each and every end office switch, BellSouth will gladly fulfill that request.

Q. CAN BELLSOUTH'S CUSTOMIZED ROUTING SOLUTIONS, WHICH INCLUDE BRANDED AND UNBRANDED RESPONSES, BE PROVISIONED IN A SHORT TIME FRAME?

A. Yes. BellSouth's customized routing solutions can be provisioned promptly and can handle both branded and unbranded responses to end users' calls. AT&T need only place an order with BellSouth for customized routing and BellSouth will provide it.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared W. Keith Milner – Senior Director – Interconnection Services, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 00-00079 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 37 pages and 6 exhibit(s).

W. Keith Milner

Sworn to and subscribed
before me on 12/20/00

NOTARY PUBLIC

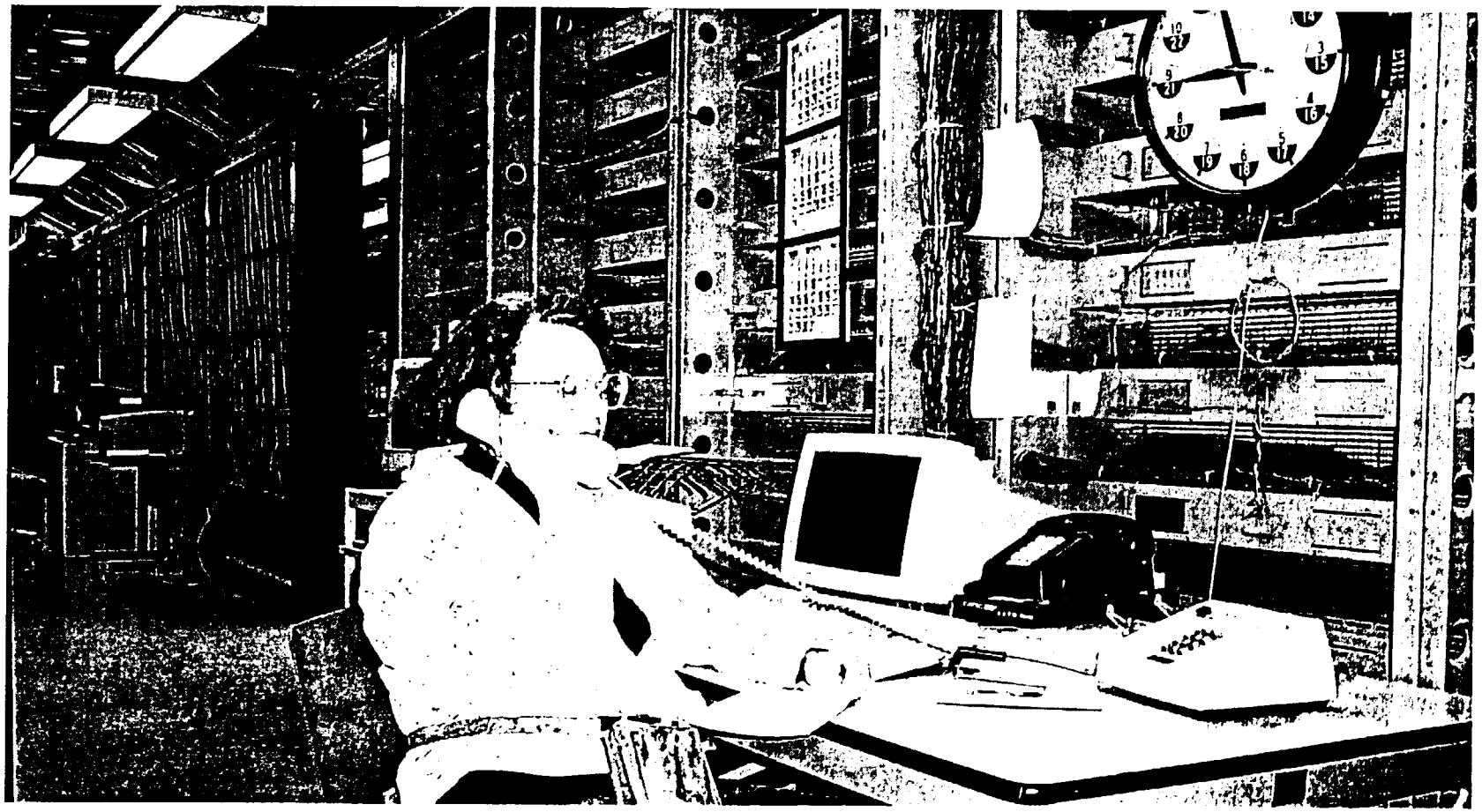
SUZY A. SHERWOOD
NOTARY PUBLIC
FAYETTE COUNTY, GEORGIA
MY COMMISSION EXPIRES
APR
28
2003

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 00-00079
December 20, 2000
Exhibit WKM-1

ATTACHMENT

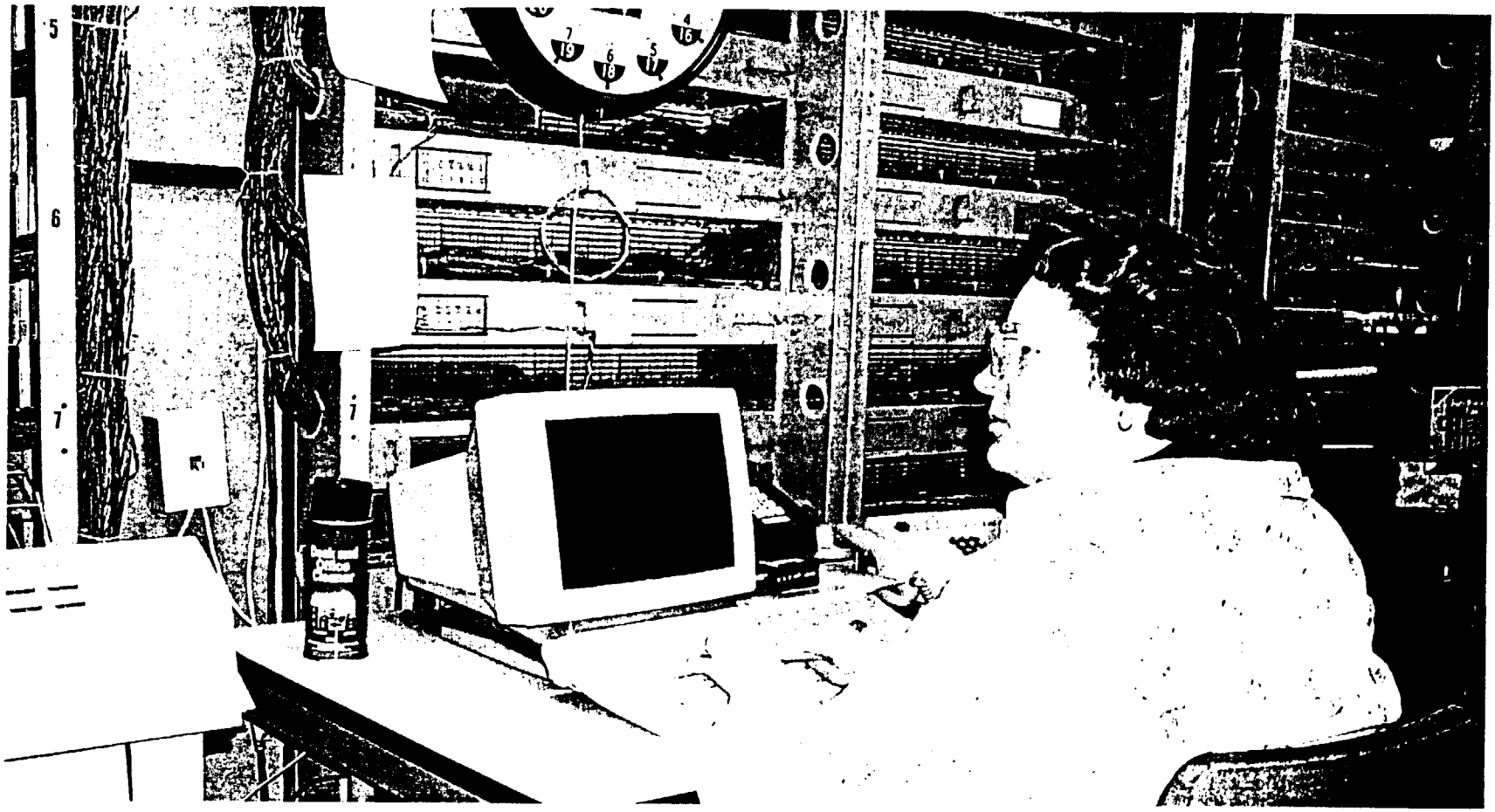
LOOP CUTOVER PROCESS

Step 1: Technician gets call to begin cutover. Asks for cable pair information.



LOOP CUTOVER PROCESS

Step 2: Technician types in cable pair number to obtain order number.



LOOP CUTOVER PROCESS

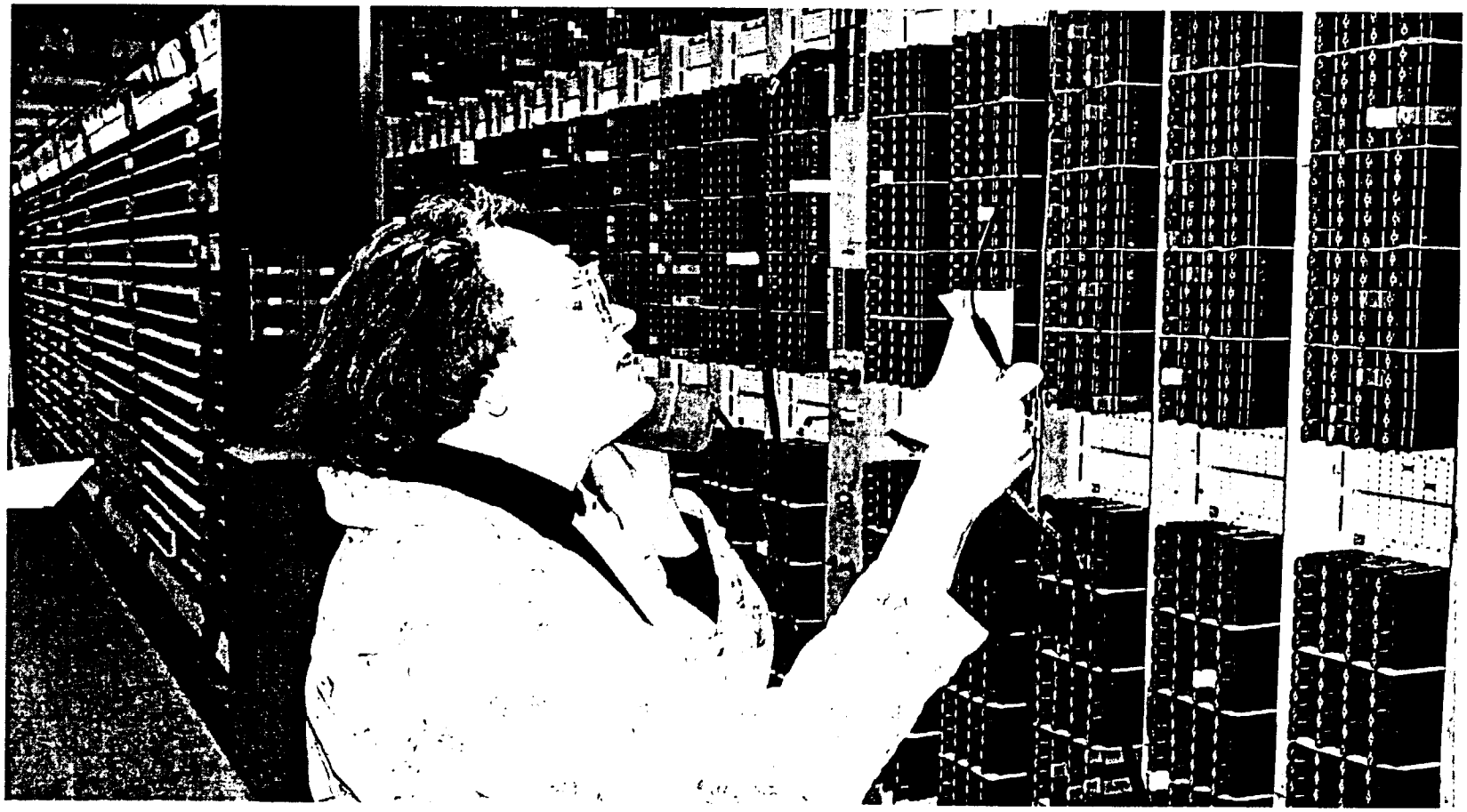
Step 3: Technician retrieves copy of work order.

LOOP CUTOVER PROCESS

Step 4: Technician responds to UNE Center request to initiate overall cutover of service from BellSouth to CLEC.

LOOP CUTOVER PROCESS

Step 5: Technician conducts ANAC test to verify that correct loop is being cutover.

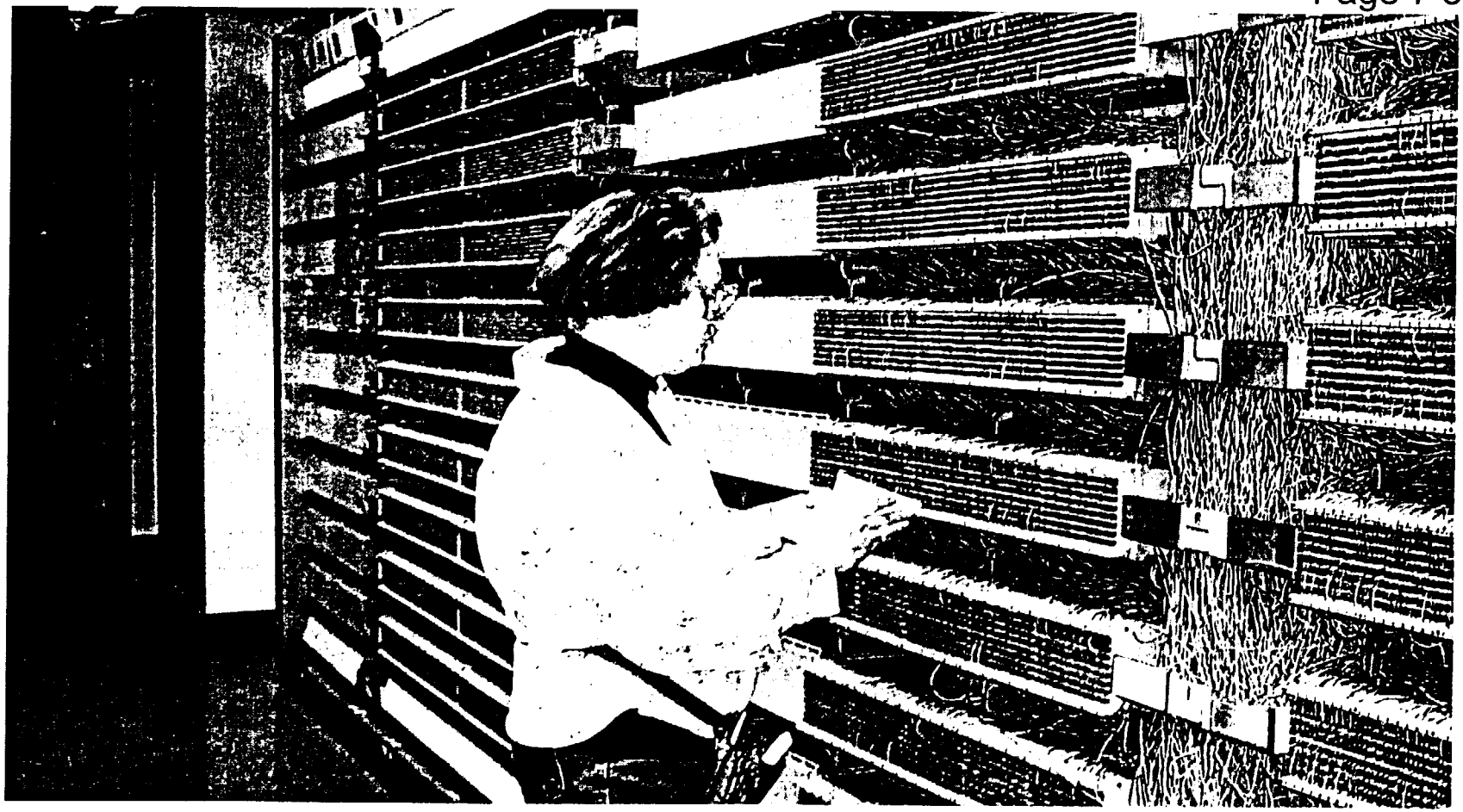


LOOP CUTOVER PROCESS

Step 6: Technician walks along Main Distributing Frame to locate both ends of jumper to be cut.

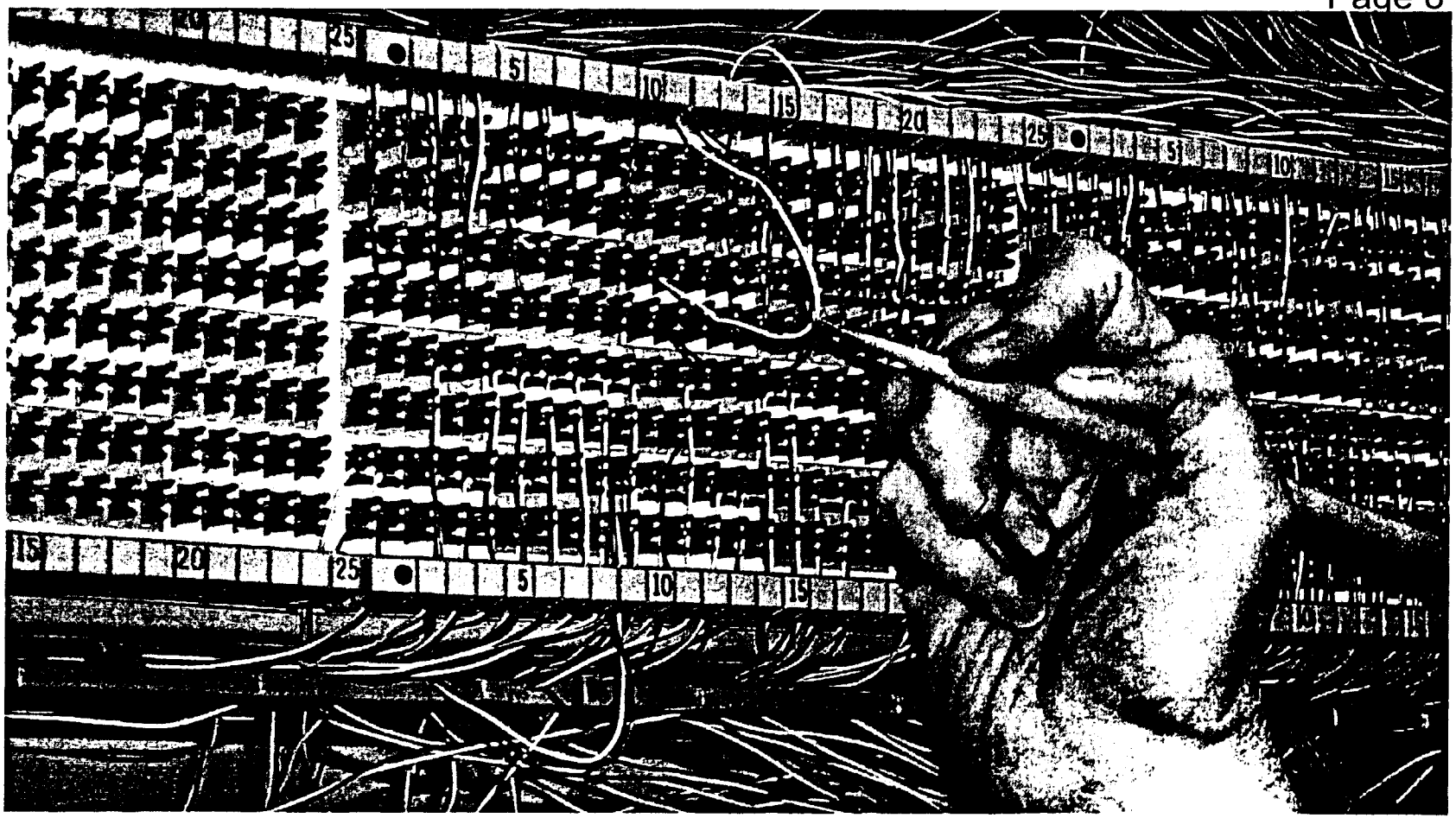
LOOP CUTOVER PROCESS

Step 7: Technician locates precise location of jumper.



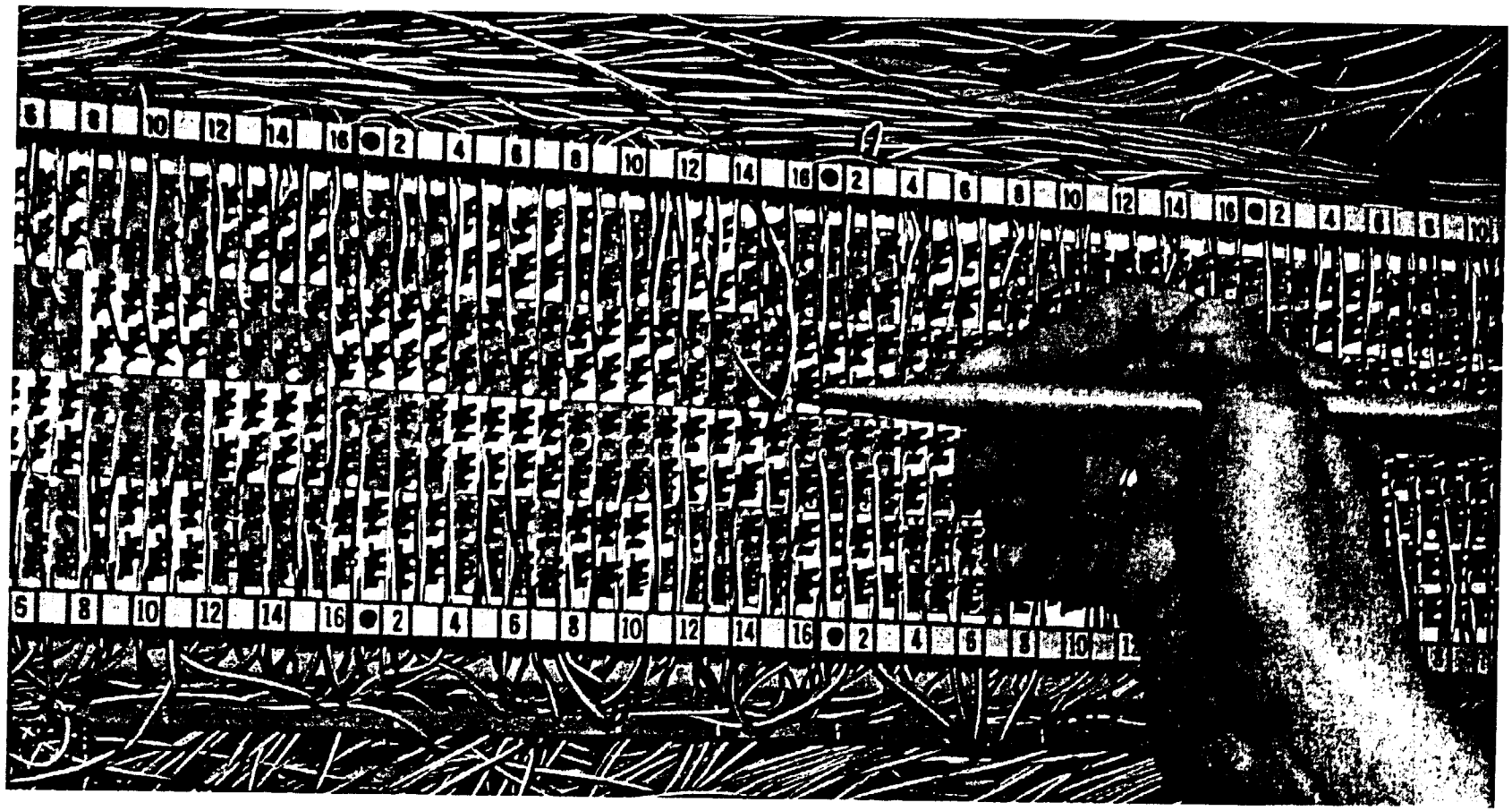
LOOP CUTOVER PROCESS

Step 8: Technician locates and removes end of jumper connected to the BellSouth cable pair.



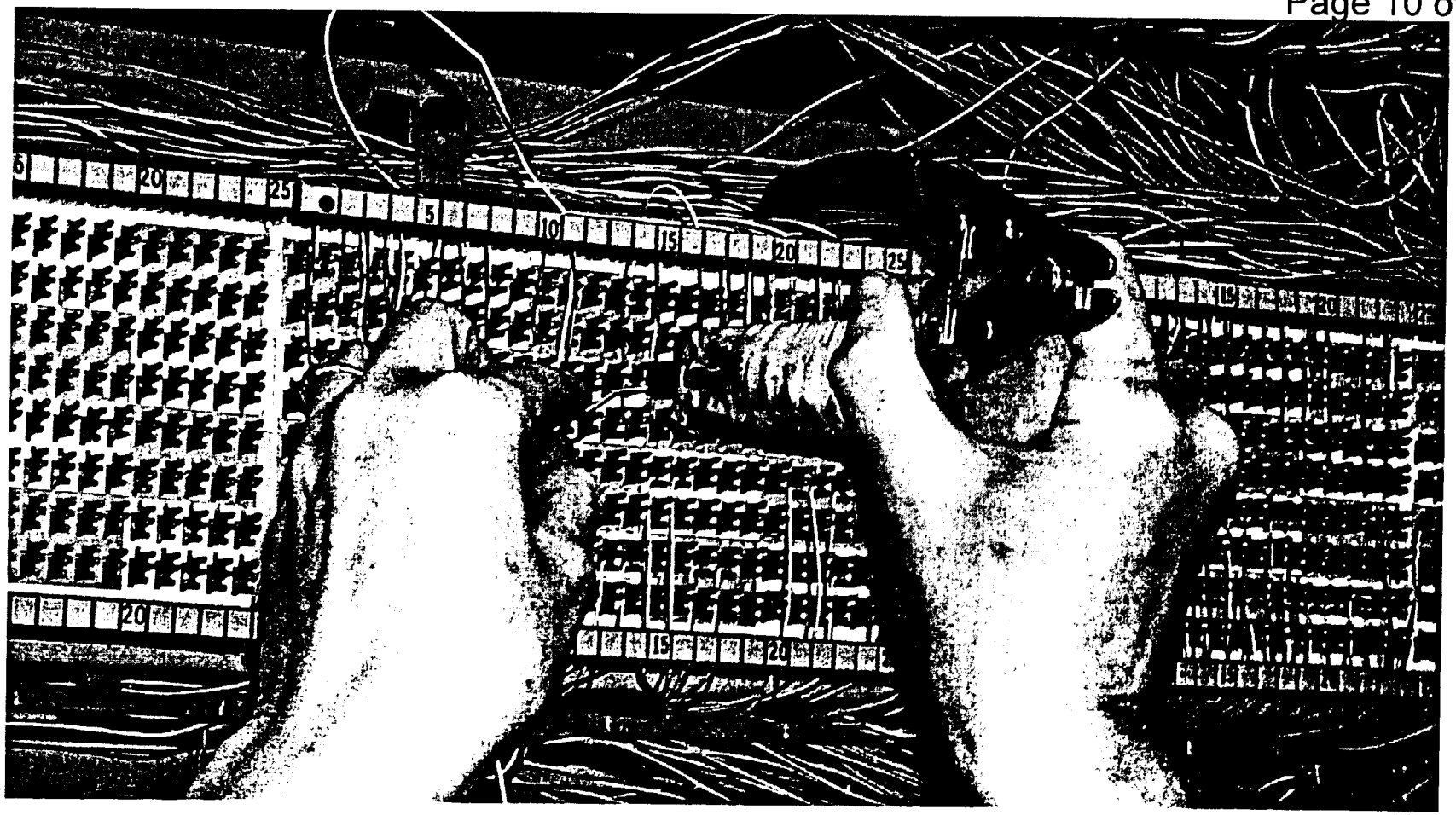
LOOP CUTOVER PROCESS

Step 9: Technician locates and removes end of jumper connected to the switching equipment.



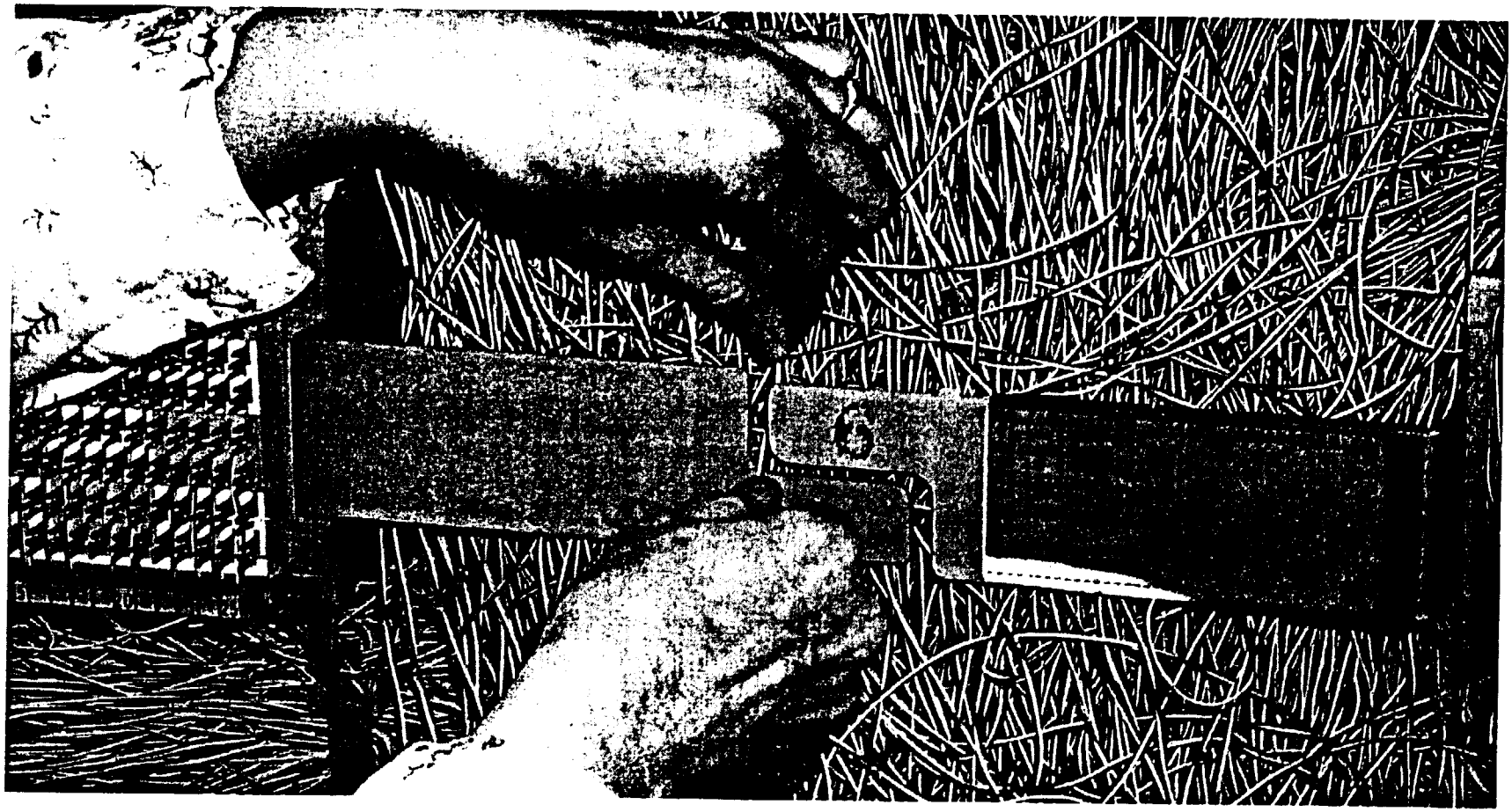
LOOP CUTOVER PROCESS

Step 10: Technician places new jumper on MDF.



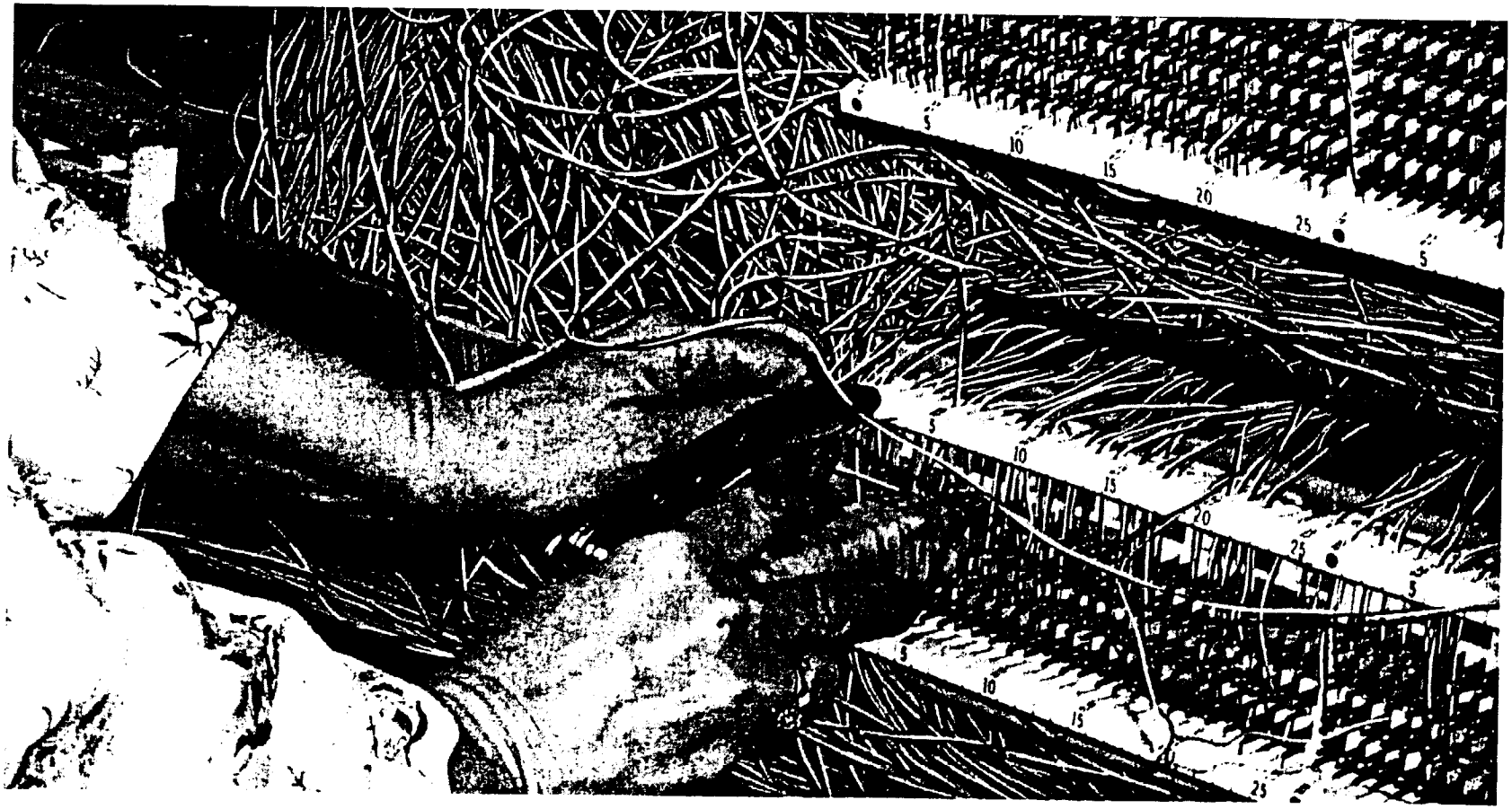
LOOP CUTOVER PROCESS

Step 11: Technician weaves wire through cable rack to reach tie cable to CLEC's collocation equipment.



LOOP CUTOVER PROCESS

Step 12: Technician connects new jumper on frame to tie cables to CLEC equipment.



LOOP CUTOVER PROCESS

Step 13: Technician conducts ANAC test to verify that loop has been cut to correct CLEC switch port.

LOOP CUTOVER PROCESS

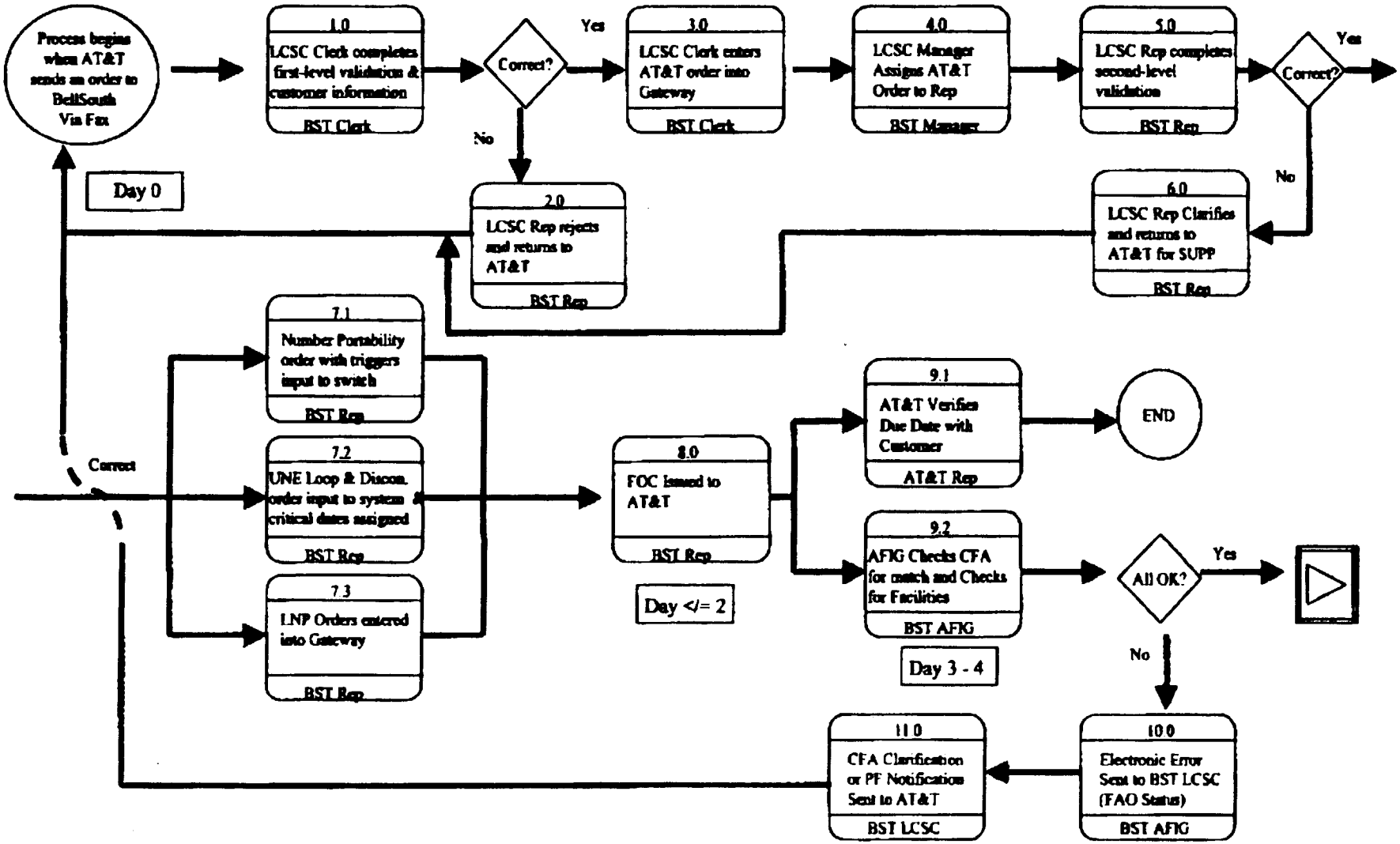
Step 14: Technician verifies cutover with CLEC, closes order, and notifies the UNE Center.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 00-00079
December 20, 2000
Exhibit WKM-2

ATTACHMENT

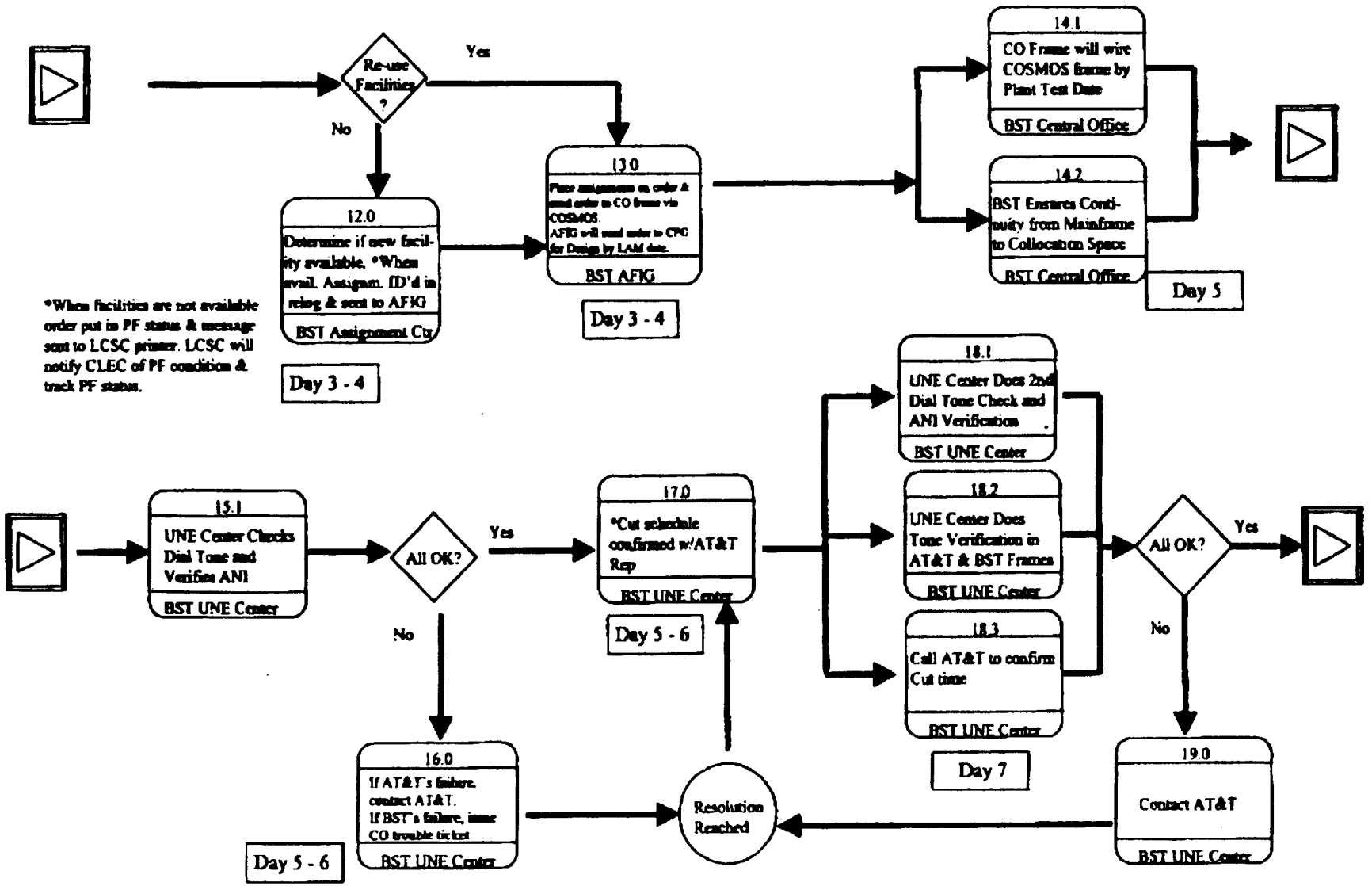
Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



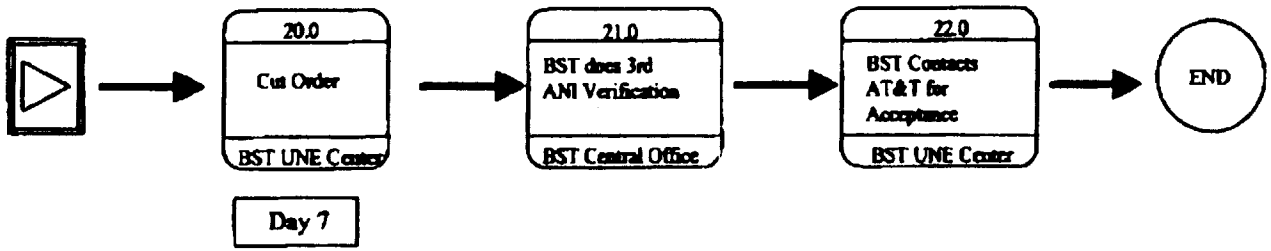
*Note: UNEC should call AT&T Rep 24 hours before Cut. If call is not made, AT&T will call UNEC.

05/18/00 14:56
05/18/00 13:51

NO.590 P004/004

Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



Critical Dates

Service Issue Date
Line Assign Made
Design Verify Assign
Wire Office Toll
Frame Completion Date
Plant Test Date
Due Date

Note: Designed orders are tracked in the UNE Center by Critical Dates. When an order is issued (SID), pseudo order drops to WFA-C to alert UNE Center. Order is screened until designed, then loaded to a specific UNE technician.

05/18/00 14:56
05/18/00 13:51

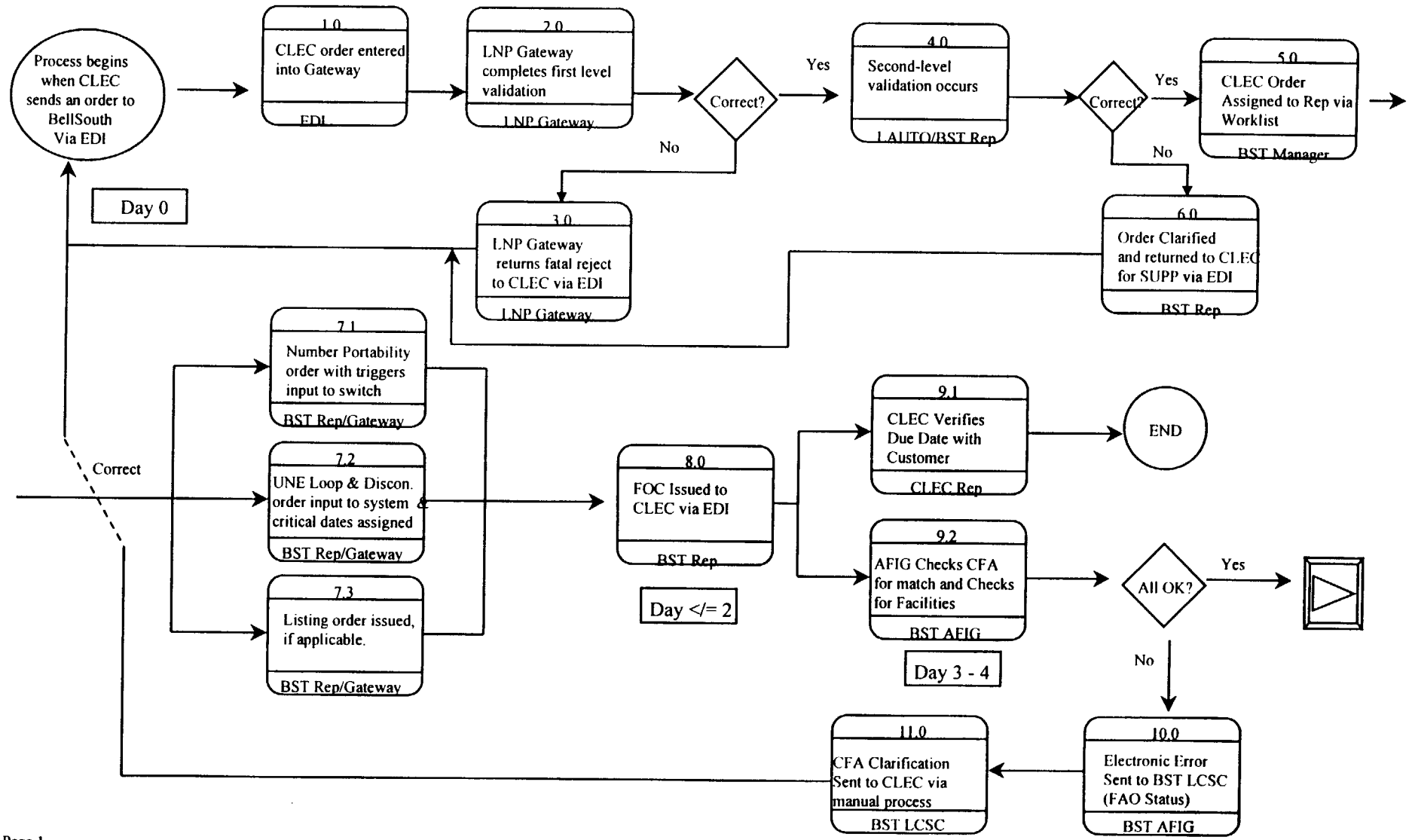
BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 00-00079
December 20, 2000
Exhibit WKM-3

ATTACHMENT

Issue 2,
4/18/00

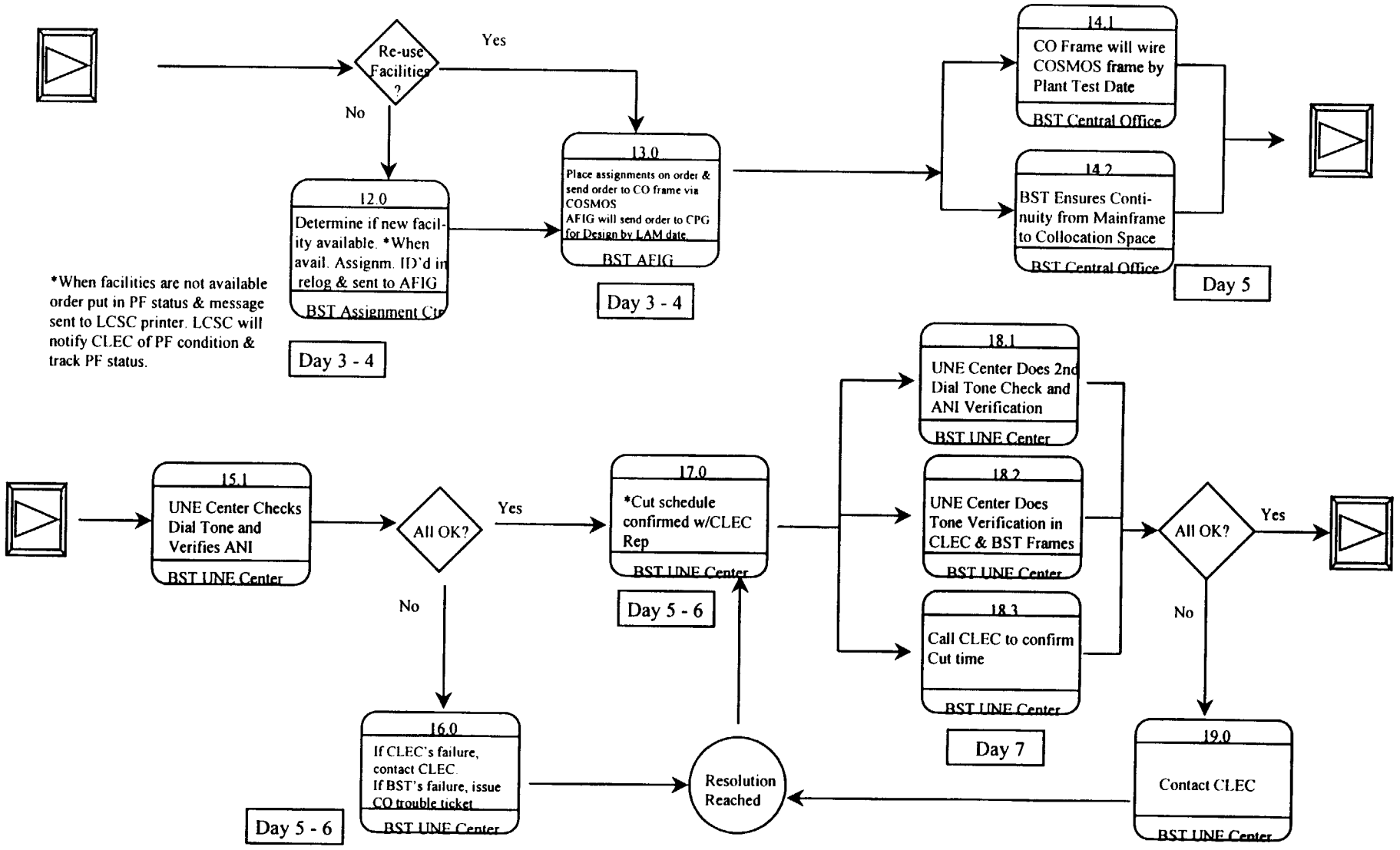
Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



Coordinated Hot Cut Process

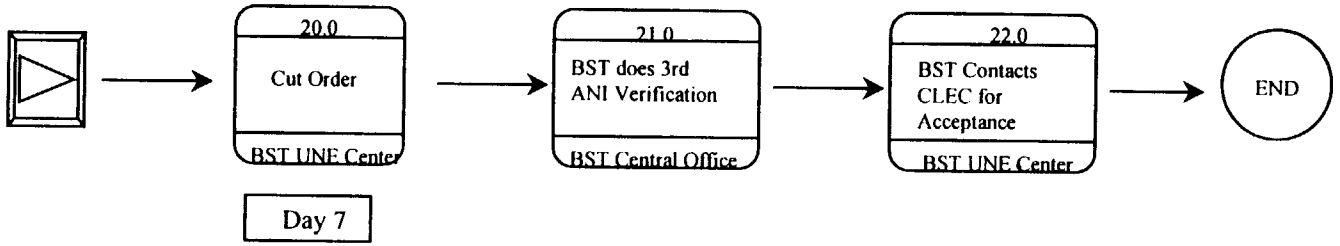
Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



*Note: Within some contracts, UNEC should call CLEC Rep 24 hours before Cut. If call is not made, CLEC will call UNEC.

Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



Critical Dates used internally by BellSouth

Service Issue Date
Line Assign Made
Design Verify Assign
Wire Office Toll
Frame Completion Date
Plant Test Date
Due Date

Note: When an order is issued (SID),pseudo order drops to WFA-C to alert UNE Center. Order is screened until designed, then loaded to a UNE technician. The UNE technician will begin testing and verification activity within 24-48 hours prior to the scheduled Due Date.

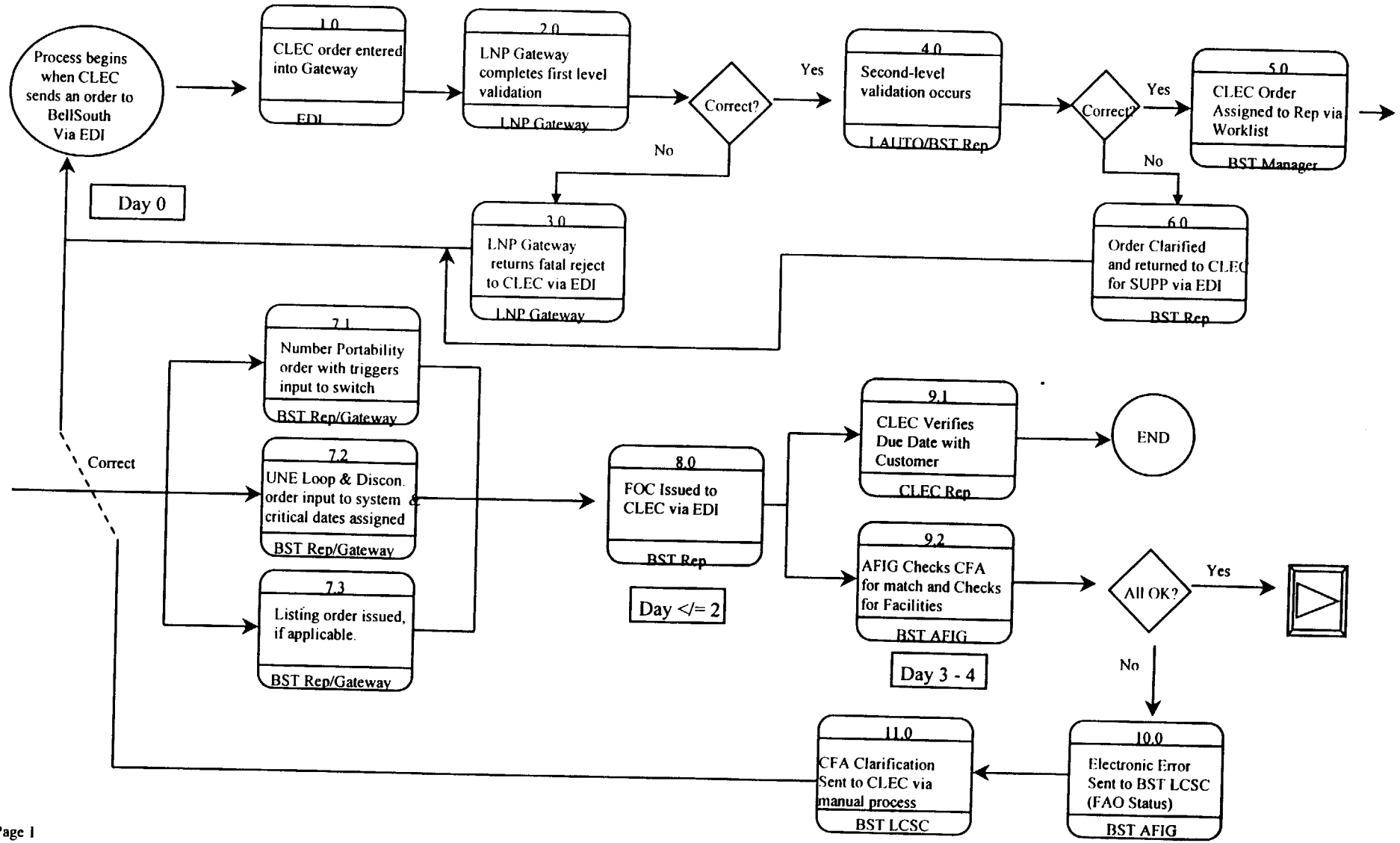
BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 00-00079
December 20, 2000
Exhibit WKM-4

ATTACHMENT

Issue 2,
4/18/00

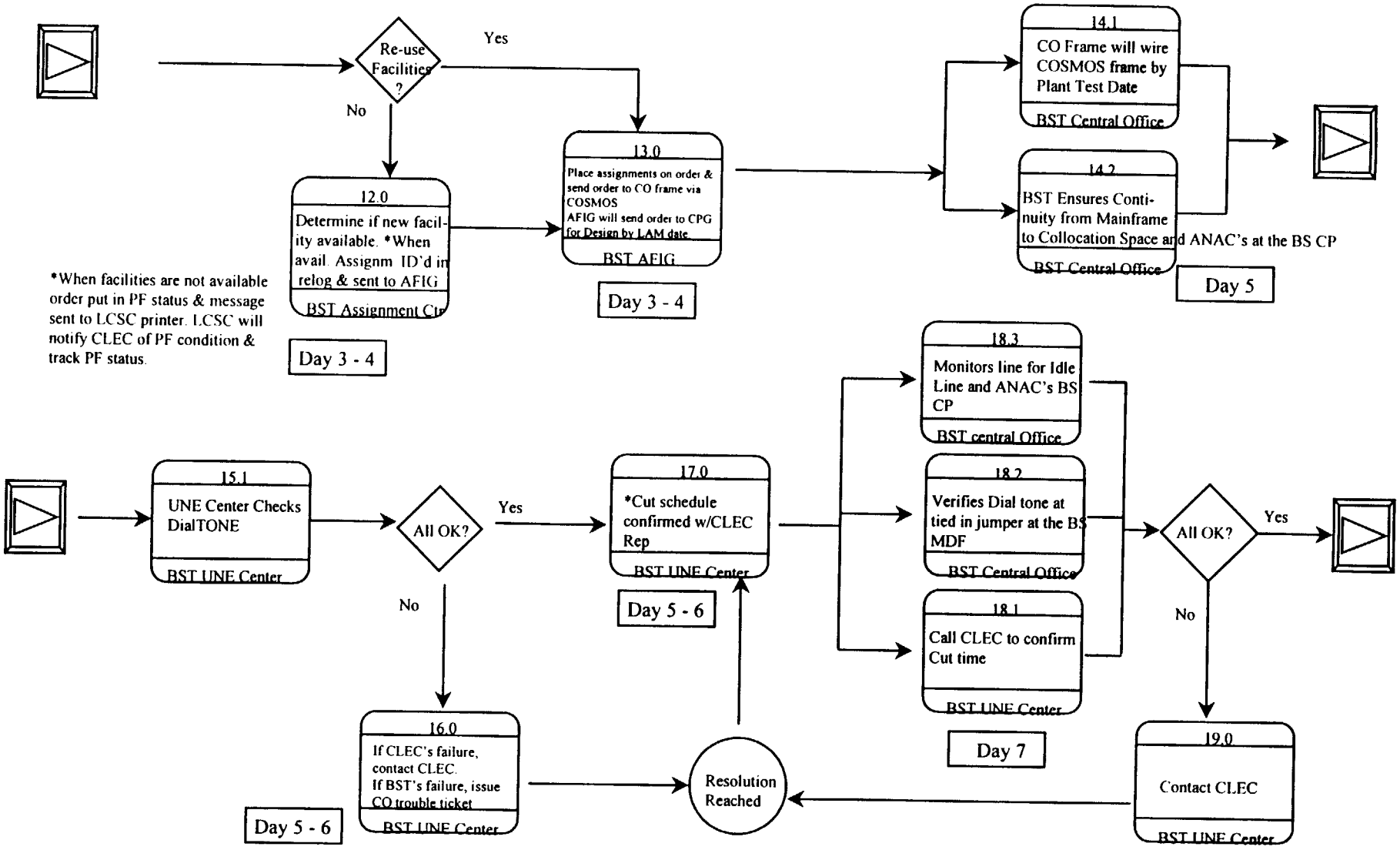
Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



Coordinated Hot Cut Process

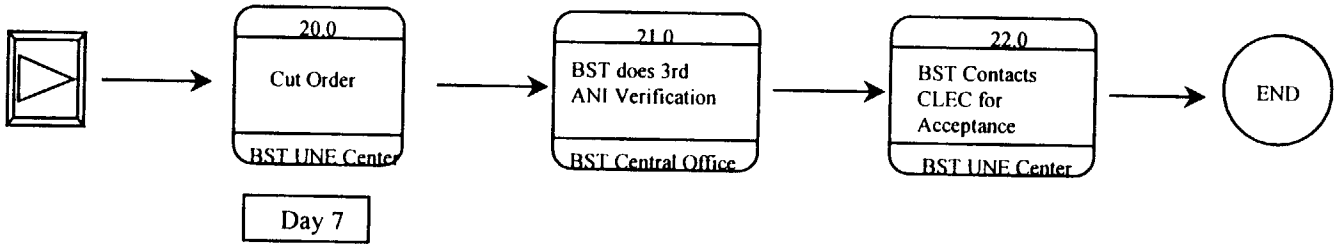
Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



*Note: Within some contracts, UNEC should call CLEC Rep 24 hours before Cut. If call is not made, CLEC will call UNEC.

Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



Critical Dates used internally by BellSouth

Service Issue Date
Line Assign Made
Design Verify Assign
Wire Office Toll
Frame Completion Date
Plant Test Date
Due Date

Note: When an order is issued (SID),pseudo order drops to WFA-C to alert UNE Center. Order is screened until designed, then loaded to a UNE technician. The UNE technician will begin testing and verification activity within 24-48 hours prior to the scheduled Due Date.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 00-00079
December 20, 2000
Exhibit WKM-5

ATTACHMENT

9.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

9.1 **SL2 Unbundled Loop Design Circuits**

9.2 All designed circuits will be manually coordinated by the UNE Center
2 WFA/DI Tickets Issued
PSA Ticket to provision TIRKs Circuits
LNP or UNE Ticket to provision the COSMOS Circuits

9.3 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone or Signaling is not required. A cross office continuity test must be preformed. The WFA/DI tickets must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

9.4 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth CP) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP on or before WOT date. If this is a voice grade circuit, the BellSouth line should be ANAC'd to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the Central Office (CO) will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

9.5 PSA ticket with a WOT step should be completed 100%.

9.6 LNP ticket should be completed 100%.

9.7 UNE Center will issue a SPLAP (work code of NT) ticket notifying CO of cut 48 hours prior to due date. For a non-attended office or outside of normal business hour cuts, the CO technician should notify the Network Manager and complete ticket 100%. The TIRKS engineering is not always available 48 hours prior to due date so the UNE Center will issue the appointment ticket as soon as the engineering is available.

9.8 UNE Center will issue a SLPIA ticket and call the CO to cut the circuits.

9.9 CO will advise UNE Center to Hold and proceed to cut location (BellSouth CP).

9.10 If voice grade circuit, CO will test for CLEC Dial Tone (DT) at tied in jumper.

9.11 If No Dial Tone (NDT), CO will go to Demarcation point (POT) and test for CLEC DT. If CLEC DT is not present, CO will remove the bridging clips, wait 2 minutes, and retest on CLEC side. When NDT condition exists from CLEC equipment, CO will advise UNE Center of specific CLEC CP that NDT condition is on. If a multi-line order, no cuts will be made if NDT condition exists on one or more circuits.

9.12 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will notify the UNE Center that the conversion can not continue and the UNE Center will direct further activities. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'd, CO will advise UNE Center that they are ready to begin the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will ANAC the line and report the CLEC TN to UNE Center. CO will remain on line with UNE Center until CLEC has accepted circuit.

9.13 If DDS grade circuit, CO will test for proper Signaling at tied in jumper.

9.14 If No Signaling (NS), CO will go to Demarcation point (POT) and test for CLEC Signaling. When NS condition exists from CLEC equipment, CO will advise UNE Center of specific CLEC CP that NS condition is on. If a multi-line order, no cuts will be made if NS condition exists on one or more circuits.

9.15 If Signaling is present at tied in jumper, CO will advise UNE Center that they are ready to begin the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will advice UNE Center when all circuits have been cut. CO will remain on line with UNE Center until CLEC has accepted circuit.

9.16 When UNE Center advises CO that CLEC accepted circuit, the CO will complete the SLPIA ticket 100%.

NOTE 1: If Unbundled DS1 Loops (Hicap), the WFA/DI tickets will be SPAH for provisioning, HISAP for the appointment ticket, and HISPIA for the cut.

NOTE 2: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.

10.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

10.1 **SL1 Unbundled Loop Non-Designed Circuits with a Frame Due Time (FDT) of 9:00pm**

10.2 Non-designed circuits with a FDT of 9:00pm (Circuit ID of TYNU) will be voice grade circuits and will be manually coordinated by the UNE Center. A single WFA/DI ticket (LNP or UNE) will be issued for the provisioning of each order. The LNP or UNE ticket will contain the COSMOS Work Package Number (WPN).

10.3 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone is not required. If No Dial Tone (NDT) exists Central Office (CO) will perform a cross office continuity test. The WFA/DI ticket must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

10.4 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth Cable Pair) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP before the due date. CO will ANAC the BellSouth line to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the CO will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

10.5 After successfully wiring and testing, the COSMOS WPN will be placed in ID jeopardy (Hold for Call) and the WFA/DI ticket will be completed 100%. The 'Start Date and Time' fields must be completed.

10.6 The Frame Output will be filed in a unique ID Jeopardy folder, bin, file, etc. on the local frame desk.

10.7 UNE Center will issue a NDSAP (work code of ND) ticket notifying CO of cut 48 hours prior to due date. For a non-attended office, outside of normal business hour cuts, or if a Time Specific cut, the CO technician will notify his/her Network Manager and complete ticket 100%. Orders are not always assigned 48 hours prior to Due Date so the UNE Center will input the appointment ticket as soon as the Order is available.

10.8 UNE Center will call the CO to cut the circuits.

10.9 CO will advise UNE Center to hold and proceed by testing for Dial Tone (DT) from the CLEC at the tied in jumper at the BellSouth CP. If multi-line order, DT

should be checked on all circuits prior to making any cuts. No circuits are to be cut if No Dial Tone (NDT) condition exists on one or more circuits.

10.10 If NDT, CO should proceed to the CLEC Demarcation point (POT) and test for DT. If CLEC DT is not present, CO will remove the bridging clips, wait 2 minutes and retest on CLEC side. If NDT from CLEC equipment, CO will notify UNE Center of problem with specific CLEC CP having NDT condition.

10.11 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will notify the UNE Center that the conversion can not continue and the UNE Center will direct further activities. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'ed, CO will advise UNE Center that they are ready and to start the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will ANAC the line and report the CLEC TN to UNE Center. CO will remain on line with UNE Center until CLEC has accepted circuit.

10.12 CO will remain on the line with the UNE Center until they report acceptance from the CLEC.

10.13 CO will create a SONPK ticket in WFA/DI to report conversion time and complete the order directly in COSMOS.

NOTE 1: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.

11.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

11.1 **SL1 Unbundled Loop Non-Designed Circuits With A Frame Due Time (FDT) of 3:30pm**

11.2 Non-designed circuits with a FDT of 3:30pm (Circuit ID of TYNU) will be non-coordinated voice grade circuits. Central Office (CO) will cut these circuits anytime on the DUE DATE.

11.3 A single WFA/DI ticket (LNP or UNE) will be issued for the provisioning of each order.

The LNP or UNE ticket will contain the COSMOS Work Package Number (WPN).

11.4 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone is not required. If No Dial Tone (NDT) exists CO will perform a cross office continuity test. The WFA/DI ticket must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

11.5 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth Cable Pair) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP before the Due Date. CO will ANAC the BellSouth line to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the CO will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

11.6 After successfully wiring and testing, the WFA/DI ticket will be completed at 10%.

11.7 Frame output should be filed by Due Date at the Frame desk.

11.8 The CO will cut the circuit(s) on the Due Date.

11.9 If No Dial Tone (NDT) on the tied in jumper, CO will proceed to the CLEC Demarcation point (POT) and test for DT. If DT is not present, CO will remove the bridging clips wait 2 minutes, and retest on CLEC side. If NDT from CLEC, CO will place the COSMOS WPN in I4 jeopardy, complete the WFA/DI ticket at 20%. On multi-line orders no circuits are to be cut if NDT condition exists on one or more circuits.

11.10 The Frame Output will be filed in a unique I4 Jeopardy folder, bin, file, etc., on the local frame desk.

11.11 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will monitor the BellSouth line every 5 to 10 minutes until the line is idle. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'd, CO will lift off jumper at BellSouth CP and terminate the tied in jumper. CO will complete the WFA/DI ticket 100% as soon as cut is completed. The 'Start Date and Time' fields must be completed prior to WFA/DI ticket completion.

NOTE 1: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.

Designed 2 Wire Loop and Ground Start - Unbundled Voice Loop
UNE Center Procedures

Testing

Pre-Service Testing Requirements for Due Date

Once wiring steps have posted complete in WFA/DI, perform all pretesting that is applicable. It is very important that continuity has been verified from the interface facility of the CLEC to the main frame of the Unbundled Loop. The UNEC should validate via dial tone verification test if test points are available. If test points are not available the UNEC will hand off to the CO for a test assist. The UNEC must TEST, TRACK, and ESCALATE until all pre-work has been completed. The CLEC will be contacted 24 to 48 hours prior to DD to confirm conversion schedule. The UNEC will attempt to handoff an appointment ticket (work-type AP) within 48 hours of the DD, or as soon as possible upon receipt of the engineering WORD document.

Check in WFA/C RO field of the OSSOI screen or behind the RRSO FID of the SOCS order for any other related order activity.

Testing Requirements for Due Date

The UNEC tech will handoff an immediate test assist ticket, Work Type IA, to the C.O. The UNEC will then call the C.O. If the handoff goes to the toll group in the C.O. and the toll group does not do these conversions it is the responsibility of the C.O. Toll Tech to get this handoff to the correct person in the C.O. It is not the responsibility of the UNEC to handoff to the frame. The C.O. Tech will show the work time taken to complete the conversion against this test assist ticket.

The CLEC will be notified on the due date of conversion. If contact attempt is unsuccessful, the conversion will proceed at the appropriate time.

For the existing service on the disconnect order, have the C.O. Tech go to BellSouth Cable Pair, pull BellSouth dial tone and ANAC the cable pair and verify that the exiting service on the D order is working to the documented assignments.

- If the existing service is working as documented, continue on to next paragraph.
- If the existing service is not working as assigned, the C.O. Tech will resolve the assignment error. Then redo this workstep.
- If the existing service is in a trouble condition the C.O. Tech will resolve the trouble. Then redo this workstep.

Have the C.O. Tech go to the cut point for Unbundled Loop. Have the C.O. tech check for CLEC dialtone on each of the circuits on the service order. CLEC dialtone must be on all circuits on an order for the conversion to continue. If the CO technician advises the UNEC that the line is in use, the UNEC will contact the CLEC for assistance. At the direction of the CLEC, the conversion will either be initiated or the order will be placed in an MA status per the UNEC SD/MA policy..

- If dialtone is present at the cut point for each circuit, have C.O. tech begin

the conversion. Start the CCSS timer for the conversion, and proceed to the next paragraph.

- If dialtone is not present at the cut point for any one of the circuits, have the C.O. Tech go the the C.O. demarcation point (Collocation Cable and Pair) and test for CLEC dialtone.
    - ♦ If dialtone is present at the demarcation point have the C.O. Technician isolate and clear the wiring trouble in the C.O. Redo this workstep.
    - ♦ If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
        - ➢ If the CLEC can correct the problem in the allotted time, repeat this workstep.
        - ➢ If the CLEC cannot correct the problem in the allotted time, the UNEC will call off the conversion and place the order into a MA status according the the UNEC SD/MA policy.

On cutovers that use new facilities, the cut point may be at the F2 facility or at the Network Interface. **It is very important on Network Interface Cut points, that the existing Network Interface is reused.**

Have the Field Work Group (FWG) Tech prior to conversion, go to the cut point pull BellSouth dial tone and ANAC the cable pair and verify that the existing service on the D order is working to the documented assignments.

- If the existing service is working as documented continue to next paragraph.
- If the existing service is not working as assigned, the FWG tech will resolve the assignment error. After the assignment error has been resolved, have the FWG redo this workstep.
- If the existing service is in a trouble condition the FWG tech will resolve the trouble. After the trouble condition has been resolved, redo this workstep.

Have the Field Work Group (FWG) Tech check each circuit on the order for CLEC dialtone. CLEC dialtone must be present on all circuits on the service order to proceed with the conversion.

- If CLEC dialtone is present on all circuits, have the FWG Tech begin the conversion. Start the CCSS timer, and proceed to the next paragraph.
- If CLEC dialtone is not present on all circuits, the UNEC will coordinate the FWG Tech and a C.O. Tech in determining if CLEC dialtone is present at the C.O. demarcation point (CLEC Cable and Pair).
    - ♦ If dialtone is present at the demarcation point, have the C.O. and FWG Techs isolate the wiring trouble and repair. Repeat this work step.
    - ♦ If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
        - ➢ If the CLEC can correct the problem in the alloted time, repeat this work step.
        - ➢ If the CLEC cannot correct the problem in the alloted time, the UNEC will call off the conversion and place the order into a MA status according the the UNEC SD/MA policy.

Due to contract negotiations the CLECs have the opportunity to specify a time window for the cutover. The negotiated time for conversion must be met. Failure to do so could result in rebating the non-recurring service order charges back to the CLEC based on contract language.

After the cutover is complete have the C.O. Tech/FWG Tech go to the end user side of the cut point. Then use the CLEC ANAC code, to ANAC the UVL. Note the CLEC number and match against the CLEC telephone number associated with the UVL on the cut sheet.

- If the numbers match, continue on to next workstep.
- If the numbers are different, have the C.O. Tech/FWG Tech isolate and clear the trouble. After the trouble has been resolved redo this step.
- If the numbers are different, but no BellSouth trouble can be isolated and cleared, inform the CLEC that they may have a potential translations problem in their switch. There are certain types of legitimate end-user services where the telephone number you call to reach that end-user, and the telephone number you hear when you ANAC the circuit will be different. The CLEC will have to determine if this is the cause of the ANAC mismatch. An example of when this will occur is with terminals within a Multiline Hunt Group (MLHG). Usually the terminals in the MLHG will ANAC the Main Telephone Number assigned to terminal one (1) in the group.

After the CO technician advises the UNEC that the cutover has been completed, the UNEC will stop the CCSS conversion timer and notify the CLEC of the completed conversion

Non-design Unbundled Voice Loops and Non-design Unbundled Sub-Loops
UNE Center Procedures

Conversion Coordination

PRESERVICE: For coordinated UVL or USL conversions the UNE Center will contact the CLEC 24/48 hours prior to due date to confirm conversion date and time. Time specific requests by the CLEC is identified on the service order behind the OCOSL USOC. The UNE center will hand off an appointment ticket within 48 hours prior to the Due Date, or as soon as possible upon receipt of the assignments on the order. Coordinated non time specific requests will be scheduled at the discretion of the UNE center and CLEC notified. Non coordinated SL1s will not have pre Due Date notification by the UNEC. Prior to the coordinated conversion the UNEC will check COSMOS for an ID jeopardy to ensure the CO is wired. If COMOS does not show the ID jeopardy, the UNEC will call the CO to determine pre-wiring status.

DUE DATE: .For coordinated SL1 UVL conversions the UNEC will contact the CO. Handoff for a test assist ticket does not apply on SL1's. The UNEC will have the C.O. Tech access the existing BellSouth Cable and Pair at the cut point. The C.O. Tech will ANAC the BellSouth line to ensure the assignments on the order are correct. The UNEC and C.O. Tech will resolve any discrepancies. The UNEC will then have the C.O. Tech check for CLEC dialtone on all circuits at the cut point. CLEC dialtone must be present on all circuits for the conversion to continue. If the CO technician advises the UNEC that the line is in use, the UNEC will contact the CLEC for assistance. At the direction of the CLEC, the conversion will either be initiated or the order will be placed in an MA status per the UNEC SD/MA policy.

- CLEC will be notified on due date of conversion. If contact is unsuccessful, conversion will proceed at appropriate time.
- If CLEC dialtone is present, continue to next paragraph.
- If dialtone is not present at the cut point for any one of the circuits, have the C.O. Tech go the C.O. demarcation point (Collocation Cable and Pair) and test for CLEC dialtone.
  - If dialtone is present at the demarcation point have the C.O. Technician isolate and clear the wiring trouble in the C.O. Redo this work step.
  - If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
    - If the CLEC can correct the problem in the allotted time, repeat this work step.
    - If the CLEC cannot correct the problem in the allotted time, the UNEC will call off the conversion and place the order into a MA status according the the UNEC SD/MA policy.

When CLEC dialtone has been verified the cutwill begin. The UNEC will start the Coordinated Cut Scheduling System (CCSS) conversion timer as appropriate. After the C.O. Tech advises the UNEC the cutover has been completed the UNEC will stop the CCSS conversion timer. Have the C.O. Tech go to the end user side of the cut point. Then use the CLEC ANAC code, to ANAC the UVL. Note the CLEC number and match against the

CLEC telephone number associated with the UVL on the cut sheet.

- If the numbers match, continue on to next work step.
- If the numbers are different, have the C.O. Tech isolate and clear the trouble. After the trouble has been resolved redo this step.
- If the numbers are different, but no BellSouth trouble can be isolated and cleared, inform the CLEC that they may have a potential translations problem in their switch. There are certain types of legitimate end-user services where the telephone number you call to reach that end-user, and the telephone number you hear when you ANAC the circuit will be different. The CLEC will have to determine if this is the cause of the ANAC mismatch. An example of when this will occur is with terminals within a Multiline Hunt Group (MLHG). Usually the terminals in the MLHG will ANAC the Main Telephone Number assigned to terminal one (1) in the group.

Notify the CLEC of the completed conversion.
Upon CLEC acceptance the associated service orders will be completed in WFA and SOCS. For coordinated USL conversions, the UNEC will wait for the outside technician to get to the crossbox or equipment room. The UNEC should have the FWG Tech ANAC the BellSouth pairs prior to conversion to verify assignments. CLEC dialtone will also be verified prior to the conversion. The CLEC will then be advised that the cut will begin. The UNEC will document the conversion time in CCSS as appropriate. Upon CLEC acceptance the associated service orders will be completed in WFA and SOCS.

DUE DATE: SL1 UVL non coordinated conversion due date activities for the UNE Center require only post conversion notification to the CLEC and tracking for network order completion. The UNEC will be notified of order completion by EnDI and the UNEC will place a notification call to the CLEC. The UNEC will follow up on any order pending completion as of 2:30 PM on the due date. The UNE Center will escalate all pending orders to the WMC in order to meet the service due date. The UNE Center will also be the CLEC point of contact for any SL1 non coordinated order provisioning issue. The UNE Center will complete or validate completion of the service order after CLEC notification.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 00-00079
December 20, 2000
Exhibit WKM-6

ATTACHMENT

BELLSOUTH

BellSouth Interconnection Services
Suite 200
1960 West Exchange Place
Tucker, Georgia 30084
770 492 7550
Fax 770 492 4512
AT&T Regional Account Team

February 28, 2000

Mr. Anthony Colbert
AT&T
1200 Peachtree Street N.E.
12TH Floor
Atlanta, GA. 30309

Dear Anthony:

This letter is to confirm the completion of BellSouth's portion of the AT&T Local Service (ALS)/BellSouth database alignment project for ALS assignments and to share with ALS the results of BellSouth's investigation.

As you will recall, this project was initiated at the end of May 1999, with BellSouth's Account Team providing ALS with files of working assignments. ALS used these files to create exception lists that identified the assignments that ALS records indicated as spare when BellSouth's records showed them as working. ALS was unable to cross reference a circuit ID, making it necessary for the Account Team to research each assignment on the exception lists in order to provide ALS with the Purchase Order Number (PON) that established each circuit. ALS then examined the updated lists and gave BellSouth instructions as to the disposition of each circuit and assignment. When applicable, the Local Carrier Service Center (LCSC) then used these instructions to issue disconnect orders for the assignments that ALS verified as spare. This activity was completed in late September 1999.

On January 18, 2000, I received confirmation that approximately 50 assignments that could not be cleared with a disconnect order have all been changed to indicate spare assignments. As of this date, all of the assignments that ALS authorized BellSouth to disconnect have been either disconnected or the status has been changed to spare in BellSouth's databases.

The breakdown of the information in the initial exception lists provided to the Account Team by ALS is as follows:

Total number of assignments in project	**3442**	
Number of assignments in alignment per AT&T	**883**	**26% of total**
Number of assignments in conflict per AT&T:	**2559**	**74% of total**

The Account Team researched and provided available PON information to ALS on the assignments shown working in BellSouth's database. A summary of the findings is detailed in the following table:

Number of assignments requiring status change by BellSouth, per AT&T	129	5% of total

BellSouth believes that this small percentage of discrepancies does not indicate any database integrity problem on the part of BellSouth.

The Account Team, LCSC operations and database support personnel performed extensive investigation in an effort to isolate the source of these relatively few discrepancies. This group was unable to determine the exact cause of all of the discrepancies. Many of them may be attributed to ALS' belief that a supplement to cancel an order had not been properly handled by BellSouth, however, a search of the fax server data did not indicate that a supplement had ever been received. Some of the discrepancies were actually update timing differences between the ALS and BellSouth databases rather than assignment status conflicts.

The last group of discrepancies involves approximately 50 assignments that could not be resolved by issuing disconnect orders in the LCSC. The circuit IDs shown working on these assignments were not being billed by BellSouth and therefore could not be corrected with a disconnect order. These assignment discrepancies appear to be related to ALS canceling the PON after some or all of the physical work had been performed. Sufficient data (because order and provisioning systems regularly purge) did not exist to draw any definite conclusions from this commonality. The number of assignments affected in this manner total only 2% of the 2559 database discrepancies. The Account Team conducted extensive investigation to identify the proper resources and determine what actions needed to be taken to complete the cleanup effort for these 50. As stated in Paragraph 3 of this letter, these assignments have been changed to spare in BellSouth's databases.

It is BellSouth's position that given the small number of assignment discrepancies this project revealed in BellSouth's assignment database, an action plan to address BellSouth's assignment database integrity is not warranted at this time. Please call me on 770-492-7557 if you have any questions.

Sincerely,

Leigh Ann Wilson
AT&T Regional Account Team

Cc Jan Burriss
Denise Berger
Sandra C. Jones

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 00-00079

DECEMBER 20, 2000

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience in operations, logistics management, human resources, sales and marketing.

I joined BellSouth in 1987, and have held various positions of increasing responsibility since that time.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have testified before the Public Service Commissions in Alabama, Florida, Georgia, Louisiana, South Carolina, Kentucky, the Tennessee Regulatory Authority and the North Carolina Utilities Commission.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A The purpose of my testimony is to provide BellSouth's position on OSS-related Issue Nos. 15, 17, 18 and 19 raised by AT&T Communications of the South Central States, Inc. ("AT&T") and TCG MidSouth, Inc. ("TCG") (collectively, "AT&T") in their Petition for Arbitration filed with the Tennessee Regulatory Authority ("Authority") on February 4, 2000.

Q. DO YOU HAVE PRELIMINARY COMMENTS BEFORE YOU RESPOND TO THE ISSUES RAISED IN AT&T'S PETITION?

A. Yes. The issues I address deal with BellSouth's Operations Support Systems – what I generally refer to as OSS in this testimony. I believe that it will be easier for the Authority to place these issues in context if I begin with a discussion of what the Federal Communications Commission ("FCC") requires, particularly with regard to access to BellSouth's OSS,

the types of OSS that will be available and their functionality. After I conclude that discussion, I will turn to the specific issues in this proceeding.

Q. DID THE FCC DEFINE NON-DISCRIMINATORY ACCESS TO OPERATIONS SUPPORT SYSTEMS?

A. Yes. The FCC's August 8, 1996 Order in Docket No. 96-98 ("FCC August 8 Order"), at paragraph 312, indicates generally that the quality of access to unbundled network elements must be comparable among and between Competitive Local Exchange Carriers ("CLEC"), and BellSouth. More specifically, paragraph 518 of the FCC's August 8 Order states that "if competing carriers are unable to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for network elements and resale services in substantially the same time and manner that an incumbent can for itself, competing carriers will be severely disadvantaged, if not precluded altogether, from fairly competing. Thus providing non-discriminatory access to these support system functions, which would include access to the information such systems contain, is vital to creating opportunities for meaningful competition."

Q. HAS THE FCC SUBSEQUENTLY REAFFIRMED THIS DEFINITION?

A. Yes. In paragraph 87 of its Order on BellSouth's second 271 application for Louisiana, the FCC reiterated its requirement that a BOC must offer

access to competing carriers that is analogous to OSS functions that a BOC provides to itself. "Access to OSS functions must be offered such that competing carriers are able to perform OSS functions in 'substantially the same time and manner' as the BOC. For those OSS functions that have no retail analogue . . . a BOC must offer access sufficient to allow an efficient competitor a meaningful opportunity to compete."

Q. DOES BELLSOUTH PROVIDE CLECS NONDISCRIMINATORY ACCESS TO ITS OSS?

A. Yes. BellSouth provides CLECs nondiscriminatory access to its OSS functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing through robust and reliable manual and electronic interfaces. The electronic interfaces are LENS, TAG, RoboTAG™, EDI, TAFI, ECTA (EC-CPM), ADUF, ODUF and EODUF. The acronyms for these interfaces will be discussed shortly and a glossary of these and other terms is provided as Exhibit RMP-1. As a final comment, BellSouth's OSS interfaces for CLECs are operated and available on a regional basis and so the same access is available everywhere, not just in Tennessee.

Q. HOW DOES A CLEC DETERMINE WHICH INTERFACES TO USE?

A. A CLEC's selection of an interface depends on its business plan and entry strategy. BellSouth has designed and implemented a variety of electronic interfaces to suit the varied business plans and entry methods of the

CLECs in BellSouth's region. CLECs can select from among the interfaces described below to match their particular mix of services, volume of orders, technical expertise, resources, and future plans. The following chart depicts the entry methods and the nondiscriminatory interfaces from which a CLEC may choose.

	Resale	**UNEs**	**Facility-Based**
Pre-Ordering	TAG	TAG	TAG
	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™
Ordering & Provisioning	EDI	EDI	EDI
	TAG	TAG	TAG
	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™
Maintenance & Repair	TAFI	TAFI (Tel. # - based)	ECTA
	ECTA	ECTA	EC-CPM
Billing	EODUF	ADUF	N/A
	ODUF	EODUF	
		ODUF	

Q. PLEASE DESCRIBE THE INTERFACES THAT BELLSOUTH USES TO ACCESS ITS OSS FOR ITS RETAIL CUSTOMERS.

A. For its retail basic exchange service customers, BellSouth uses two retail marketing and sales support systems to access pre-ordering, ordering, and provisioning information from BellSouth's downstream OSS. BellSouth uses the Regional Negotiation System ("RNS") for most types of residential service requests. For business customers, BellSouth uses the Regional Ordering System ("ROS").

Q. CAN YOU DESCRIBE GENERALLY THE TYPES OF INTERFACES THAT BELLSOUTH OFFERS TO CLECS THAT ALLOW THEM TO HAVE THE SAME PRE-ORDERING AND ORDERING FUNCTION THAT BELLSOUTH HAS?

A. BellSouth offers a number of interfaces from which the CLECs can choose. Some are machine-to-machine interfaces and others are human-to-machine interfaces. We offer both kinds because there are a tremendous number of CLECs out there and the "one size fits all" mentality just won't allow everyone to participate in the manner that they want to. I do want to emphasize, however, that BellSouth simply makes the alternatives available. We do not attempt to dictate which of the interfaces any particular CLEC will utilize.

Q. CAN YOU EXPLAIN WHAT YOU MEAN BY "MACHINE-TO-MACHINE" VS. "HUMAN-TO-MACHINE"?

A. Yes. Let's illustrate the difference by looking at the maintenance and repair interfaces. BellSouth's Trouble Analysis and Facilitation Interface ("TAFI") is a human-to-machine interface, and the Electronic Communications Trouble Administration ("ECTA") Gateway is a machine-to-machine interface. With TAFI, a CLEC's service representative has direct access to the BellSouth systems used for trouble reporting and tracking. That is, the CLEC representative sees exactly what a BellSouth service representative sees, and interacts directly with BellSouth's OSS. With ECTA – a machine-to-machine interface – the service representative interacts with the CLEC's own computer software, and that computer software then interacts with the BellSouth OSS.

Q. LETS BEGIN WITH THE MACHINE-TO-MACHINE PRE-ORDERING AND ORDERING FUNCTIONS. CAN YOU DESCRIBE WHAT IS AVAILABLE FOR THE CLECS?

A. Yes. BellSouth provides CLECs with a machine-to-machine industry standard Telecommunications Access Gateway ("TAG") pre-ordering, ordering and provisioning interface. The TAG pre-ordering and ordering interfaces provide access to the same pre-ordering, ordering, and provisioning OSS functions accessed by the BellSouth retail systems, RNS and ROS. TAG, which was developed in response to specific

requests from mid-sized and large CLECs and in response to the Georgia PSC's Docket No. 8354-U, provides a standard Application Programming Interface ("API") to BellSouth's pre-ordering and ordering OSS. TAG is based on Common Object Request Broker Architecture ("CORBA"), which is the industry standard for pre-ordering. The TAG pre-ordering interface has been available since August 31, 1998. TAG follows the industry standard Ordering and Billing Forum ("OBF") guidelines for Local Service Requests ("LSRs"). The TAG ordering interface has been available since November 1, 1998.

Q. IS THERE ANOTHER MACHINE-TO-MACHINE ELECTRONIC ORDERING AND PROVISIONING INTERFACE THAT BELLSOUTH PROVIDES TO CLECS?

A. Yes. BellSouth also provides CLECs with the machine-to-machine Electronic Data Interchange ("EDI") ordering interface. EDI allows CLECS to access the same ordering and provisioning OSS functions accessed by RNS and ROS for BellSouth. EDI follows the industry standard protocol (EDI) for ordering and the industry standard OBF guidelines for LSRs. EDI has been available to any interested CLEC since December 1996.

Q. CAN A CLEC INTEGRATE ITS OWN INTERNAL OSS WITH BELLSOUTH'S TAG AND EDI INTERFACES?

A. Yes. In accordance with the FCC's requirements, BellSouth provides CLECs with all the specifications necessary for integrating the BellSouth interfaces. A CLEC may integrate ordering and pre-ordering functions by integrating the TAG pre-ordering interface with the EDI ordering interface, or by integrating TAG pre-ordering with TAG ordering. CLECs interested in integrating the pre-ordering and ordering systems with their own internal systems must, of course, have their own internal OSS, and have responsibility for that integration. By requiring BellSouth to provide "the specifications necessary to instruct competing carriers on how to modify or design their systems in a manner that will enable them to communicate with the BOC's legacy systems and any interfaces utilized by the BOC for such access," it is clear that the FCC intended that the CLECs, not BellSouth, would perform the necessary integration. Ameritech Michigan Order, paragraph 137.

Q. WHAT ARE THE ADVANTAGES OF THIS KIND OF INTEGRATION?

A. The interfaces BellSouth makes available for CLECs provide non-discriminatory access to the pre-ordering, ordering, and provisioning information and functions in BellSouth's OSS, while also allowing the CLECs to develop their own customer service systems, including their own pricing, packaging, sales, and customer account recommendations. By using the integratable interfaces, CLECs can customize their own marketing and sales support systems to perform functions such as automatic telephone number selection, preferred and local interexchange

carrier (PIC/LPIC) searches, and credit checks (after contracting with a third-party credit reporting agency). Integratable interfaces allow CLECs to design the appearance and "feel" of their marketing and sales support systems as they see fit; this is one of the advantages of integration and machine-to-machine interfaces. Because these CLECs' marketing and sales support systems integrate the electronic interfaces with the CLECs' own internal OSS, CLECs can use information obtained via the electronic interfaces to build their own databases, such as databases of their own local customer service records.

Q. ARE THERE OTHER CHOICES AVAILABLE FOR CLECS THAT DO NOT WANT TO USE THESE INTEGRATABLE MACHINE-TO-MACHINE ELECTRONIC INTERFACES?

A. Yes. Because BellSouth recognizes that there are CLECs that have decided not to use integratable machine-to-machine interfaces, BellSouth offers CLECs a variety of other interfaces to suit their needs and business plans for preordering, ordering and provisioning.

For CLECs that wish to use TAG for pre-ordering, ordering, and provisioning in conjunction with their own databases, but have made the business decision not to hire programmers to develop and maintain their own TAG interface, BellSouth sells an interface called "RoboTAG™." This interface was developed by Science Applications International Corporation (SAIC), under contract with BellSouth. RoboTAG™ is a standardized,

browser-based interface to the TAG gateway that resides on a CLEC's LAN server, and provides integrated pre-ordering and ordering with up-front editing. BellSouth first made RoboTAG™ available in November 1999. The first CLEC that purchased RoboTAG™ completed testing and was ready for production on November 24, 1999.

Q. DOES BELLSOUTH OFFER A HUMAN-TO-MACHINE INTERFACE THAT OFFERS PRE-ORDERING, ORDERING, AND PROVISIONING?

A. Yes. For CLECs that have made the business decision not to integrate pre-ordering, ordering and provisioning interfaces with their own internal OSS, and do not want to expend the resources necessary to use RoboTAG™, BellSouth makes available the human-to-machine Local Exchange Navigation System ("LENS") interface. LENS is a web-based graphical user interface ("GUI"). The LENS GUI requires software development only on BellSouth's side of the interface. With the release of version 6.0 of LENS on January 14, 2000, LENS became a GUI to the TAG gateway. LENS now uses TAG's architecture and gateway, and therefore has TAG's pre-ordering functionality for resale services and UNEs, and TAG's ordering functionality for resale services. While LENS is not integratable with a CLEC's internal OSS, LENS does provide integrated pre-ordering and ordering in its firm order mode. In order to use LENS, a CLEC must have, at a minimum, a personal computer, web browser software, and an internet connection to use LENS (of course, the

CLEC must also test with BellSouth, attend training, and obtain a password). LENS has been available since April 1997.

Q ONCE AN ORDER IS PLACED, DOES BELLSOUTH HAVE AN INTERFACE AVAILABLE TO CLECS THAT ALLOWS THEM TO CHECK THE STATUS OF THE ORDER?

A. Yes. The CLEC can use the CLEC Service Order Tracking System ("CSOTS"), which became available in December 1999. This web-based electronic interface allows CLECs to view service orders on-line, track service orders, and to determine the status of their service orders. Specifically, CLECs can view their orders as they appear in BellSouth's Service Order Communication System ("SOCS"), and obtain other useful provisioning and status information, such as jeopardy statuses, pending facilities (PFs), and missed appointments (MAs). CSOTS provides CLECs with a "view" that shows service orders by order status and by state. CSOTS also allows CLECs to search for information using a variety of criteria, including a range of due dates; the current due date; the telephone account number; the service order number; and the purchase order number ("PON"). CLECs can sort this information by PON, by NPA NXX, by status type, by the number of days orders have been in a particular status, by listed name, by service order number, by current due date, and by application date. CSOTS offers CLECs the option of viewing and/or downloading provisioning information using Microsoft's Excel™ spreadsheet program.

Q. TURNING NOW TO THE OTHER FUNCTIONS THAT BELLSOUTH MUST MAKE AVAILABLE TO CLECS, CAN YOU DESCRIBE WHAT MAINTENANCE AND REPAIR INTERFACES BELLSOUTH USES FOR ITS RETAIL CUSTOMERS?

A. Yes. I have already mentioned this briefly. For BellSouth's retail customers with Plain Old Telephone Service ("POTS"), BellSouth's business and residence repair center attendants use either a business or residence version of the human-to-machine Trouble Analysis and Facilitation Interface ("TAFI"). For non-POTS services, BellSouth uses the human-to-machine WFA-C interface.

Q. WHAT INTERFACES DOES BELLSOUTH OFFER CLECS FOR MAINTENANCE AND REPAIR?

A. BellSouth offers TAFI to CLECs. The TAFI system for CLECs combines the complete functionality of the separate business and residence versions of TAFI used by BellSouth's repair attendants.

Q. TAFI IS A HUMAN-TO-MACHINE INTERFACE WHETHER USED BY BELLSOUTH OR A CLEC. DOES BELLSOUTH PROVIDE CLECS WITH A MACHINE-TO-MACHINE TROUBLE REPORTING INTERFACE IN ADDITION TO THE TAFI INTERFACE?

A. Yes. Again, as I have mentioned, BellSouth also offers CLECs the machine-to-machine Electronic Communications Trouble Administration ("ECTA") Gateway, which conforms to the T1/M1 standard for local exchange trouble reporting and notification. I should note, to be complete, that BellSouth also offers the human-to-machine EC-CPM interface, which provide access to BellSouth's OSS for POTS and non-POTS services and UNEs.

Q. CAN YOU TELL US THE DIFFERENCE BETWEEN TAFI AND ECTA?

A. I will explain the difference in detail later in my testimony, but basically, TAFI allows the BellSouth or CLEC representative to input a trouble and get feedback, often while the end-user customer is still on the line. The ability to get feedback right away is not available in ECTA. However, ECTA can be integrated with the CLEC's internal OSS and databases, whereas TAFI cannot.

Issue 15: What procedures should be established for AT&T to obtain loop-port combinations (UNE-P) using both Infrastructure and Customer Specific Provisioning?

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF THIS ISSUE?

A. Based on the information in AT&T's matrix, the information contained in proposed interconnection agreement language submitted with its petition and the negotiations that have occurred between the two parties, BellSouth understands that this issue deals with the way that AT&T will order Operator Service/Directory Assistance ("OS/DA") for its subscribers. AT&T wants the ability to submit two types of orders; 1) an infrastructure provisioning or "footprint" order to establish a specific single, or "default", OS/DA routing plan and 2) individual LSRs for specific AT&T end user customers.

Q. CAN YOU ELABORATE ON WHAT AT&T WANTS WITH REGARD TO THIS ISSUE?

A. It is my understanding that, with regard to the "footprint order", AT&T is requesting a mutually agreed upon documented process that BellSouth and AT&T will follow to implement AT&T's request to have its customers' calls routed to a BellSouth OS/DA platform, but to have the call unbranded. This issue is discussed in more detail in Mr. Milner's testimony, but assuming that what AT&T is requesting is a "default" routing, BellSouth can provide that electronically.

Q. HAS BELLSOUTH PROVIDED AT&T WITH PROCEDURES TO ESTABLISH THE "FOOTPRINT ORDER"?

A. Yes. BellSouth has provided information to allow AT&T to adopt any one of three "default" routings for its OS/DA calls. Procedures to establish the "footprint order" were first provided in the proposed contractual language for AT&T's interconnection agreement. In August of 2000, BellSouth provided AT&T "footprint order" proposed contractual language for the OS/DA unbranded routing option. On October 23, 2000, BellSouth provided additional proposed contractual language for a custom branded option. On October 26, 2000, BellSouth provided additional proposed contractual language for a third party platform routing option. Each document provides the process for establishing the "footprint order" for that particular option, and these three proposed contractual language documents are provided together as Exhibit RMP-2.

BellSouth delivered the user requirements for the unbranded OS/DA option to AT&T on November 13, 2000. The current version 4.0 of the user requirements for this feature is attached as Exhibit RMP-3. The document's Change History log (pg. 4) outlines the development of these procedures.

Q. DOES AN INDUSTRY STANDARD EXIST THAT CAN BE USED TO ACCOMPLISH WHAT AT&T IS ASKING FOR?

A. No. An industry standard has not been approved by the Ordering and Billing Forum ("OBF"), a subcommittee of the Alliance for Telecommunications Solutions ("ATIS"), governing the location of a

customized branded or unbranded routing code on an electronic order. As clarification, ATIS is the primary body addressing industry standards and guidelines in these areas.

However, BellSouth is willing to provide AT&T with the capability of submitting individual customer LSRs electronically. Furthermore, as the result of AT&T's request for an OS/DA unbranded routing option, and subsequent negotiations between the two parties, BellSouth has developed the electronic ordering capability to automatically identify and generate specified Line Class Codes ("LCC") on behalf of AT&T when AT&T selects the OS/DA unbranded option. BellSouth implemented this feature in Release 8.0 on November 18, 2000.

Q. WHAT ADDITIONAL ENTRIES ARE REQUIRED OF AT&T TO SUBMIT LSRS FOR UNBRANDED OS/DA?

A. AT&T will submit LSRs for unbranded OS/DA in accordance with standard BellSouth business rules for ordering port/loop combinations. No special or additional entries are required.

Q. CAN OTHER CLECS ORDER THE SAME CAPABILITY FROM BELLSOUTH?

A. Absolutely. On November 22, 2000, Carrier Notification SN91082004 (provided as Exhibit RMP-4) was posted to the BellSouth Interconnection

Services web site announcing the availability of the feature, with instructions for interested CLECs to contact their account team representatives for information. The documentation for the general CLEC community is the same as that for the AT&T documentation (Exhibit RMP-3) without the AT&T-specific information related to their project.

Issue 17: Should the Change Control Process be sufficiently comprehensive to ensure that there are processes to handle at a minimum the following situations:

a) introduction of new interfaces;

b) retirement of existing interfaces;

c) exceptions to the process;

d) documentation, including training;

e) defect correction;

f) emergency changes (defect correction);

g) an eight-step cycle, repeated monthly;

h) a firm schedule for notifications associated with changes initiated by BellSouth;

i) a process for dispute resolution including referral to state utility commissions or courts;

j) a process for escalation of changes in process;

k) a process for changing the process.

Q. WHAT IS THE CHANGE CONTROL PROCESS?

A. As the Authority knows, the CLECs are entitled to have access to the OSSs utilized by BellSouth to provide service to its customers. To facilitate this access, the interfaces that I have previously mentioned, TAG, EDI, LENS and so forth, have been developed. Obviously changes in these interfaces are of importance to both BellSouth and the CLECs. The Change Control Process ("CCP") is the process by which BellSouth and the CLECs manage requested changes to the CLEC interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to change requests. This process covers change requests that affect external users of BellSouth's electronic interfaces, associated manual process improvements, performance or ability to provide service including defect notification. Associated documentation is included in this process. The Change Control Process itself is documented in a publication that is now in version 2.0, and that is attached to my testimony as Exhibit RMP-5.

Q. IN ITS RECENT ORDER APPROVING BELL ATLANTIC'S NEW YORK APPLICATION FOR LONG DISTANCE, HOW DID THE FCC DESCRIBE "CHANGE MANAGEMENT"?

A. The FCC stated, "The change management process refers to the methods and procedures that the BOC employs to communicate with competing carriers regarding the performance of and changes in the BOC's OSS

system. Such changes *may* include operations updates to existing functions that impact competing carrier interface(s) upon a BOC's release of new interface software; technology changes that require competing carriers to meet new technical requirements upon a BOC's software release date; additional functionality changes that may be used at the competing carrier's option, on or after a BOC's release date for new interface software; and changes that may be mandated by regulatory authorities." [Emphasis added.] Bell Atlantic New York Order, ¶103Q.

Q. DOES BELLSOUTH HAVE A GENERAL POSITION ON THE INCLUSION OF THIS ISSUE IN THIS ARBITRATION?

A. Yes. BellSouth's position is that the content of the CCP is not an appropriate issue for arbitration with an individual CLEC. The CCP was established through collaboration between interested CLECs, including AT&T, and BellSouth. The changes submitted through this process are handled collaboratively by the participating CLECs and BellSouth. By proposing to arbitrate this issue, AT&T is effectively attempting an end-run around the CCP and effectively excluding other CLECs that have a very real interest in how the change control process works. Allowing AT&T to succeed in this end-run would result in AT&T's gaining an unfair advantage over the parties that adhere to the process. Like the interfaces themselves, the change control process is regional. Issues submitted to the CCP must be dealt with by BellSouth and all of the membership of

ninety-six (96) CLECs (as of November 30, 2000) participating in CCP - not just BellSouth and AT&T.

Q. IN ITS PROPOSED RECOMMENDED ARBITRATION ORDER BEFORE THE NORTH CAROLINA PUBLIC UTILITIES COMMISSION (DOCKET NO. P-140, SUB 73 & P-646, SUB 7), WHAT IS THE RECOMMENDATION OF THAT COMMISSION'S STAFF RELATED TO ARBITRATION OF THE CHANGE MANAGEMENT ISSUE?

A. On page 16 of its proposed recommended order, the North Carolina Public Utilities Commission Staff states that "this arbitration docket is an inappropriate forum for consideration of wholesale modifications to the CCP or the CCP document, as proposed by AT&T. . . . The CCP, an open forum of industry technical experts, should bear the primary responsibility of debating the merits of AT&T's proposed changes in OSS and working toward solutions and compromises that are acceptable to AT&T, BellSouth, and the industry as a whole." On page 17 of its proposed recommended order, the Staff further recommends that "the Commission also concludes that it should not mandate changes to the CCP or interim CCP document in this arbitration docket without all of the interested CLPs [Competing Local Providers] having ample opportunity to participate in these discussions".

Q. WHAT DID KPMG SAY REGARDING BELLSOUTH'S CHANGE CONTROL PROCESS DOCUMENT AS PART OF THE GEORGIA THIRD PARTY TEST OF CHANGE MANAGEMENT?

A. KPMG – hired by BellSouth and approved by the Georgia and Florida Public Service Commissions to perform Third Party Testing per the orders by those two Commissions – stated that the current CCP document (Exhibit RMP-5) does satisfy all of the KPMG change management evaluation criteria.

Q. IF THIS AUTHORITY SHOULD DETERMINE A SEPARATE CCP IS REQUIRED FOR TENNESSEE, HOW WOULD THIS DECISION AFFECT THE CCP?

A. This is of major concern to BellSouth. The manual processes and electronic interfaces implemented for the CLECs by BellSouth are regional systems. And as I stated previously, the CCP is a regional, collaborative process between BellSouth and the participating CLECs.

Since this issue is being arbitrated between BellSouth and AT&T in at least six states, conceivably BellSouth could be required to implement separate change control processes for two, four, or even all six states. This would destroy the regional and collaborative nature of the CCP. The decisions affecting the CCP are better left with the industry itself, the participating CLECs and BellSouth. If the Authority does determine to

hear this issue, BellSouth respectfully submits that the Authority should only give guidance on these issues, rather than order specific changes in order to avoid the state-to-state conflicts I mentioned.

Q. IF THE AUTHORITY SHOULD DETERMINE THAT IT WILL ALLOW ARBITRATION OF THIS ISSUE, HOW IS YOUR TESTIMONY ORGANIZED TO PRESENT BELLSOUTH'S POSITION ON THE INDIVIDUAL SUB-ISSUES RAISED BY THIS DISPUTE?

A. Although BellSouth believes that this entire issue is inappropriate for arbitration, BellSouth will address the issue as described by AT&T's issues matrix. First, I will provide background on the change management process. Then I will provide BellSouth's individual responses to items (a) through (k) raised in Issue 17.

Q. HOW WAS THE CCP DEVELOPED?

A. BellSouth established its original change management process, known as the Electronic Interface Change Control Process ("EICCP"), to secure input from the CLECs regarding future enhancements to existing electronic CLEC interfaces, and to have an organized means of securing, understanding and prioritizing the CLECs' requirements regarding these interfaces. From the beginning of the EICCP's development, BellSouth sought the participation of the CLECs, including AT&T. Discussions

began in October 1997 and AT&T was a member of the committee that developed the process.

The Georgia Public Service Commission Staff ("Staff") conducted a Technical Workshop with BellSouth and the interested CLECs on December 9-10, 1997 at which the change management process was discussed. In its Recommendation issued on December 12, 1997, as a result of the workshop, the Staff recommended a change control process for electronic interfaces. The GA PSC issued its order approving the staff recommendation on April 21, 1998. On May 15, 1998, the EICCP became effective and operational throughout BellSouth's region.

Q. WHAT CATEGORIES DID THE ORIGINAL EICCP ENCOMPASS?

A. The original EICCP handled the following categories of changes: software, hardware, industry standards, products and services, new or revised edits, process, regulatory, and documentation.

Q. HAS THE ORIGINAL PROCESS BEEN ENHANCED?

A. Yes. BellSouth and the CLECs jointly determined and agreed that the original EICCP needed to be enhanced. Thus, a workshop on this subject was held on February 16-17, 2000, and all participating CLECs were invited. This was done so that all of the CLECs – not just one or two of them – could propose changes to the plan. AT&T was the driving force

behind the majority of the changes proposed during the workshop. Following the workshop, a draft revised Change Control Process document ("CCP document") was distributed to the CLECs.

BellSouth conducted conference calls on February 29, 2000, March 23, 2000 and every month thereafter – again, with all participating CLECs invited – to review the recommended CCP changes raised during the workshop and to follow-up on any outstanding issues. Exhibit RMP-6 provides a copy of the February 29, 2000 Steering Committee Meeting minutes.

Q. PLEASE EXPLAIN HOW THE CHANGE MANAGEMENT PROCESS WAS EXPANDED AS A RESULT OF THE WORKSHOPS AND CONFERENCE CALLS.

A. At the first workshop, suggestions were made that the process be expanded to include:

1) defect change requests for both documentation and software that are BellSouth- and CLEC-initiated, and CLEC-affecting;
2) BellSouth-initiated enhancement requests that are CLEC-affecting (CLEC-initiated enhancement requests are already included in the existing process.);
3) BellSouth's escalation and defect notification processes;
4) formalization of escalation and defect notification processes;

5) definition of how the new processes will be incorporated into the existing change control structure;

6) monthly status update meetings that are open to all CLECs;

7) new e-mail process for system outages and defect notices.

Q. DID BELLSOUTH MAKE THESE ENHANCEMENTS?

A. Yes.

Q. DID BELLSOUTH CHANGE THE NAME AS A RESULT OF THE WORKSHOPS AND CONFERENCES?

A. Yes. The name was changed from EICCP to Change Control Process ("CCP") to reflect a broadened scope to include, among other changes, manual processes in addition to the existing electronic interfaces.

Q. WHAT STEPS DID BELLSOUTH TAKE TO OBTAIN AN AGREEMENT FROM THE CLEC PARTICIPANTS REGARDING THE CHANGES TO THE CCP?

A. In an effort to obtain agreement from the CLEC participants, BellSouth posted the Change Control Process Interim Document ("Interim CCP") on the website on March 22, 2000. In order to obtain concurrence from the CLEC community within the BellSouth region, BellSouth posted Carrier Notification Letter SN91081679 on the Interconnection Website on March

23, 2000 announcing the Interim CCP and requesting input from the CLEC community by April 10, 2000. The Website address is: http://www/interconnection.bellsouth.com/carrier. Exhibit RMP-7 provides a copy of Carrier Notification Letter SN91081679.

Q. DID THE INDUSTRY REACH AN AGREEMENT TO IMPLEMENT THE NEW CCP?

A. No. BellSouth attempted to gain approval of the CCP from the participating CLECs. Even though all participants agreed that the EICCP needed to be changed, industry approval was not obtained as to the actual Interim CCP. However, the CLEC participants and BellSouth did agree to a three-month trial period for the Interim CCP. The Interim CCP became effective on April 17, 2000. BellSouth posted Carrier Notification Letter SN91081733 to the website, on April 14, 2000, announcing implementation of the Interim CCP on April 17, 2000 and directing the CLECs to the new Interim CCP website. Exhibit RMP-8 is a copy of Carrier Notification Letter SN91081733. The most recent version of the BellSouth Change Control Process document, Version 2.0, dated August 23, 2000, is posted on the website at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.htm (Exhibit RMP-5)

Q. WHAT ACTIONS HAVE BEEN TAKEN SINCE THE THREE-MONTH TRIAL PERIOD ENDED?

A. The three-month trial period ended in July 2000. BellSouth told the CLECs in the June 26, 2000 Monthly Status Call meeting that a vote would be taken at the July 26, 2000 Monthly Status Call meeting. However, the July 26 meeting lasted 3 hours, which was well over the allotted time. As a result the CCP participants were not requested to vote to establish the new "baseline" CCP document. Instead, the matter was carried over, with BellSouth indicating that the vote would be taken at the next scheduled Monthly Status Call meeting in August. During the August 23, 2000 Monthly Status Call meeting, the CLEC participants agreed by a vote of 6-3 to accept the new "baseline" CCP document.

Exhibit RMP-9 is a copy of the June 26, 2000 Monthly Status Call minutes. Exhibit RMP-10 is a copy of the August 23, 2000 Monthly Status Call minutes.

Q. YOU STATED EARLIER THAT THERE ARE NINETY-SIX (96) CLECS PARTICIPATING IN CCP. DO ALL OF THEM PARTICIPATE IN EACH MONTHLY MEETING?

A. As stated previously, ninety-six CLECs are *currently* (as of November 30, 2000) registered as participants of the Change Control Process. At the time of the August 23, 2000 voting, there were eighty-three (83) registered members. However, not all of them participate in any given meeting.

As additional information, there are approximately 1,600 Commission- or Authority-approved CLECs in the nine-state BellSouth region, and approximately 300 of them are actually doing business in the local telecommunications market (as of October 31, 2000). In Tennessee, those numbers are 200 and 98 respectively. BellSouth has made a proactive effort to inform all CLECs region-wide about the CCP, and has encouraged their membership and active involvement.

Even though a meeting agenda is prepared and distributed prior to each meeting, a review of our records for the months March 2000 to October 2000 indicate an average of only ten CLECs, with few exceptions, participate in the CCP meetings. From the July 26, 2000 Monthly Status Call minutes attached in Exhibit RMP-11, it can be seen that only a few CLECs are consistently active in this process.

Q. WILL BELLSOUTH CONTINUE TO ENHANCE THE CHANGE CONTROL PROCESS?

A. Yes. As previously discussed, change control is an ever-evolving process and the approved CCP document is a "baseline, living" document. BellSouth is committed to the change management process; and therefore, will continue to consider input that will enhance the process to best serve the CLEC community as a whole.

For instance, BellSouth has initiated a series of CCP Process Improvement meetings devoted to improving the process. CCP Process Improvement Meetings were conducted on October 17, 2000, November 1, 2000 and December 7, 2000. Among the items discussed during the Process Improvement meetings were:

1) Revision history on Carrier Notifications related to documentation updates/upgrades
2) Defect/Expedite Process
3) BellSouth Release Management milestones (Future Releases schedule or calendar)
4) Coding Changes
5) BellSouth's internal process for scheduling prioritized change requests
6) AT&T's suggested changes ("marked-up version") to CCP Document Version 2.0
7) A process for appealing BellSouth release schedules
8) Timeframes for providing draft and final user requirements associated with releases
9) A process for inclusion of non-OBF standard requests

Exhibit RMP-12 provides a copy of the October 17, 2000 meeting minutes, Exhibit RMP-13 provides a copy of the November 1, 2000 meeting minutes: and RMP-14 provides a copy of the December 7, 2000 meeting minutes.

A. HAS AT&T SUGGESTED CHANGES TO THE BELLSOUTH CCP DOCUMENT?

A. Yes. In an attempt to arbitrate this issue in other states, AT&T has filed suggested changes to the CCP document in the form of marked-up copies of various versions of BellSouth's CCP document. On April 27, 2000, AT&T filed a marked-up copy of the BellSouth CCP Interim Version 1.4 document in its Arbitration Proceeding before the North Carolina Public Utilities Commission. The Interim CCP Version 1.4 with AT&T's suggested changes was a 49-page document with proposed substantive changes on 18 pages. A copy of the CCP Interim Version 1.4 document with AT&T's Proposed Changes is provided in Exhibit RMP-15. Of AT&T's suggested changes, BellSouth agreed with the following changes suggested by AT&T:

1) Testing added to Process list (added page 7, version 2.0)
2) Broader definition of term "defect" (added page 11, version 2.0)
3) Three Impact Levels of High, Medium, and Low added to Type-6 Defect/Expedited Process (added page 25, version 2.0)
4) Conference call used to discuss Type-6 Workaround, if appropriate (added page 29, version 2.0)
5) Agreed to proposed Introduction of New Interfaces language provided that portion of BellSouth's language struck by AT&T remains in document

In an attempt to arbitrate this issue in the proceeding before the Georgia Public Service Commission, AT&T filed a copy of BellSouth's CCP Version 2.0 document with suggested changes, some of which differ from the changes AT&T submitted to the North Carolina Public Utilities Commission. The CCP Version 2.0 document with AT&T's suggested changes was submitted to the Georgia Commission on September 22, 2000. The document with AT&T's suggested changes is a 70-page document with proposed substantive changes on 24 pages. The major topics for which AT&T is currently requesting changes can be divided into the following groups:

1) Training
2) Rejection/Cancellation/Reclassification of change requests
3) Sizing/sequencing of prioritized change requests
4) Defect/ Expedite Feature Change Process
5) Software Release Notification schedule
6) Dispute Resolution Process
7) Changes to Process
8) Escalation Process
9) Testing

In addition to trying to arbitrate these issues before the state commissions and this authority, AT&T submitted a CCP Change Request, Log # CR0171, on September 9, 2000 requesting that the BellSouth "baseline" CCP document be modified to include the changes outlined in AT&T's

marked-up CCP Version 2.0 document, which is the process that should have been followed in the first place. AT&T's marked-up CCP Version 2.0 document was discussed during the CCP Process Improvement Meeting conducted on October 17, 2000. It was decided that a sub-team was needed to review and discuss AT&T's proposed changes and to get other CLEC participants' input and concerns. AT&T's CCP representative facilitated a sub-team review meeting on October 27, 2000 with the CLEC participants and BellSouth in attendance. A copy of the AT&T Change Request including the CCP Interim Version 2.0 document with the sub-team's Proposed Changes is provided in Exhibit RMP-16. A copy of AT&T's minutes from the October meeting are provided in confidential Exhibit RMP-17.

Q. WHAT HAS BEEN BELLSOUTH'S RESPONSE TO THE SUB-TEAM'S SUBMISSION OF ITS MARKED-UP CCP VERSION 2.0?

A. On December 5, 2000, BellSouth made available to the CLECs its own proposal regarding changes to the CCP Version 2.0 to be considered at the December 7, 2000 CCP Process Improvement meeting. BellSouth's version reflects a good-faith effort to incorporate all of the reasonable and doable changes proposed by AT&T and the CLECs. A copy of the CCP Version 2.0 document with BellSouth's proposed changes – and also containing the sub-team's proposed changes – is provided as Exhibit RMP-18.

Q. BASED UPON THE DECEMBER 7, 2000 PROCESS IMPROVEMENT REVIEW MEETING, HAS A NEW CHANGE CONTROL PROCESS DOCUMENT BEEN FINALIZED AND ACCEPTED FOR POSTING ON THE CCP WEBSITE?

A. Not yet. No changes were officially accepted at the December 7, 2000 meeting. While a number of the proposed changes have been agreed upon in principle, there are still some key issues remaining for further discussion within the CCP, where BellSouth contends the discussions belong. In that regard, the CLECs and BellSouth agreed to hold a full-day session on January 10, 2001 to attempt to reach agreement on the document. A copy of the minutes of the December 7, 2000 meeting is provided as Exhibit RMP-14.

Since the new document version is not final, and negotiations are ongoing at the time of the filing of this direct testimony, BellSouth will provide its testimony based upon the current posted documentation – CCP Version 2.0 (Exhibit RMP-5). In instances where it's appropriate to note BellSouth's proposed changes, I will do so.

Q. EVEN THOUGH A NEW CHANGE CONTROL PROCESS DOCUMENT HAS NOT BEEN FINALIZED, CAN YOU PROVIDE HIGHLIGHTS OF SOME OF THE MAJOR CLEC-REQUESTED CHANGES TO WHICH BELLSOUTH AGREES?

A. Certainly. One of the CLECs' priorities is the separation of the expedite process from the Type-6 defect notification process. An expedite in this case is defined as the inability for a CLEC to process certain types of orders based on the existing functionality of BellSouth's OSS's. A Type-6 defect is a CLEC-impacting defect caused by a BellSouth system not operating as specified in baseline business requirements or published business rules. BellSouth has agreed to such a process, and has presented its version of such a process to respond to CLEC business needs (Exhibit RMP-18, pages 37-41). The recommendation provides a clear definition of "expedites", along with safeguard parameters to ensure the proper use of the process.

BellSouth also agreed to additional advance notification to the CLECs for certain kinds of changes. As examples, BellSouth agrees to provide draft and final user requirements for software releases no later than 90 and 45 days in advance, respectively; notification of the implementation of a new Telecommunications Industry Forum ("TCIF") map no later than 180 days in advance of the implementation release date; and draft and final user requirements for the new TCIF map no later than 120 and 60 days, respectively, in advance of the release implementation date (Exhibit RMP-18, page 22). I'd like to point out that the CLECs have since asked for 240 days advance notification of the implementation of a new TCIF map. Until the December 7, 2000 meeting, BellSouth was under the impression that 180 days was sufficient for the CLECs.

BellSouth has also agreed to a proposed change of a reduction in defect cycle and response time intervals, i.e., a reduction from four business days to two business days for the development and validation of workarounds for high-impact defects (Exhibit RMP-18, page 47).

Q. WHAT ARE SOME OF THE PROPOSED CLEC CHANGES THAT BELLSOUTH IS NOT ABLE TO SUPPORT, AND CAN YOU PROVIDE BELLSOUTH'S REASONS FOR SUCH?

A. As explained earlier, BellSouth has made a good-faith effort to incorporate as many reasonable and doable CLEC-proposed changes into its own CCP proposal as is possible. As would be expected, not all proposed changes fall into that category.

One of the CLEC-proposed changes is a reduction in the cycle time to review a change request ("CR") for acceptance. The cycle time is currently 20 days. The CLECs – primarily AT&T – have requested a 10-day window for this step in the change request process. AT&T has provided no analysis or basis for cutting the cycle time in half. BellSouth feels that such a review cannot be done in less than 20 days because that step involves reviewing the change's impact on other systems, manual processes, documentation and training. Other steps include determining if a CR already exists, determining if it's a CLEC training issue, or determining if the CR meets the criteria for an expedited feature. In short, BellSouth wants to ensure that appropriate front-end planning occurs in

order to minimize the possibility of defects later. All of this takes time and 20 days is a reasonable period to accomplish these steps. (Exhibit RMP-18, page 24)

On another issue, BellSouth has added a sub-section to the Retirement of Interfaces section – where BellSouth already states that we provide CLECs 180 days advance notification for the retirement of interfaces – to indicate we'll provide CLECs 120 days advance notification for the retirement of old *versions* of interfaces (Exhibit RMP-18, page 57). This gives sufficient time for CLECs to migrate to the more current versions of interfaces where the greatest number of features and any defect corrections reside. Although BellSouth feels that the 120-day notification is sufficient, AT&T has requested 180 days, again with no basis provided for their position. I'd like to point out also that in this section BellSouth has agreed to provide user requirements for new versions of interfaces 180 days in advance.

The issue of emergency changes continues to be one in which BellSouth believes there already exists a process within the CCP. True emergencies – defined as a total interface outage – are handled by the Electronic Communications Support ("ECS") group. At issue here are high-impact defects, which are not true emergencies. High-impact defects are appropriately handled in a fast turnaround time via the issuance of a Type-6 defect change request.

In summary, while AT&T is attempting to arbitrate these proposed changes to the CCP before this Authority, AT&T is also actively using the CCP in an effort to make these changes. As discussed previously, the CCP was established through collaboration between interested CLECs and BellSouth. The changes submitted through this process are handled collaboratively by the participating CLECs and BellSouth. Therefore, the CCP, utilizing input from the CCP Process Improvement Sub-Team, is the appropriate forum for review and acceptance or rejection of the CCP changes suggested by AT&T.

Q. WHAT INTERFACES ARE COVERED BY THE CCP?

A. The CCP covers change requests for the LENS, TAG, EDI, TAFI, ECTA, and CSOTS electronic interfaces and the associated manual processes that have the potential to impact the ordering, pre-ordering and maintenance and repair functions utilized by BellSouth and the CLECs connected to BellSouth's interfaces.

Q. WHAT TYPES OF CHANGES DOES THE CCP HANDLE?

A. The CCP handles the following types of changes:

1) Software
2) Hardware
3) Industry standards
4) Products and Services (i.e., new services available via the in-scope

interfaces)

5) New or revised edits

6) Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)

7) Regulatory

8) Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance)

9) Defects/expedites

Q. WHAT IS NOT INCLUDED UNDER THE CCP?

A. As documented in the CCP, the CCP does not include the following: BonaFide Requests ("BFR"), production support, contractual agreement issues, collocation, testing support (although BellSouth has agreed in its proposed changes to support this), and helpdesk-type issue resolution questions. Change requests of this nature will be handled through existing processes.

Q. HOW ARE THESE EXCLUDED ITEMS HANDLED?

A. BellSouth's Interconnection Account Team handles contractual agreement issues, testing support, BFR, and collocation. The BellSouth Customer Support Manager or Account Team handles issues related to production support and issue resolution.

Q. TURNING TO THE ACTUAL OPERATION OF THE CCP, HOW ARE CHANGE REQUESTS CLASSIFIED IN THE CCP?

A. Pursuant to the CCP, all change requests are classified by type. The definition of each type and the process flow for each (including the intervals) are detailed in the CCP referenced above. The following table summarizes the types.

Type	Name
Type 1	System Outage
Type 2	Regulatory Change
Type 3	Industry Standard Change
Type 4	BellSouth-Initiated Change
Type 5	CLEC-Initiated Change
Type 6	CLEC-Impacting Defect/Expedite

Q. CAN YOU EXPLAIN THE DIFFERENT CHANGE REQUEST TYPES?

A. Yes. Even though not specifically stated as such in the CCP, the six types can be sub-divided into three distinct categories. These categories are represented in the CCP document as three separate, distinctive process flows. The following table summarizes the categories:

Category	Type	Description
Category 1	Type 1	System totally unusable or degradation in existing feature or functionality
Category 2	Types 2- 5	Change requests for system enhancements, manual and/or business processes, can also include issues for pre-order, orders, maintenance/repair
Category 3	Type 6	CLEC impacting defect in production – system not operating as specified in baseline business requirements or published business rules, includes documentation defects Expedited Feature – inability for CLEC to process certain types of orders to BellSouth because of a problem on BellSouth's side of the interface.

Q. PLEASE PROVIDE AN EXPLANATION OF A CATEGORY-1 CHANGE REQUEST.

A. Category 1 covers the processes that are used in the event of a system outage to report, resolve, and communicate information regarding the outage in an expeditious fashion. These processes are used to keep all system users informed about a specific situation. Category 1 issues are included in the CCP so that if there are to be changes in the identification, notification and resolution process, the CLECs and BellSouth will jointly develop how these changes will be made.

Category 1 involves a situation where an electronic interface is totally unusable. That is, the CLECs' pre-order, order or maintenance/repair reports cannot be submitted or will not be received by BellSouth. In this

situation, processes are in place to identify the problem, notify those affected, and provide statuses regarding the resolution of the problem. The CCP deals with proposed changes in the processes.

To make this clearer, let me describe the current processes involved with a system outage. Either BellSouth or the CLEC can originate notification of an outage. If a CLEC originates the notice, the CLEC reports it via a telephone call to BellSouth's Electronic Communications Support ("ECS") help desk. The ECS records and tracks the outage report and works to resolve the outage. If the outage is not resolved within 20 minutes of ECS receiving the report, the CLEC community is notified of the outage via a notification placed on BellSouth's CCP website. http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.html

Exhibit RMP-19 is a screen snapshot from the website for Type-1 System Outages. In addition, an e-mail is sent to the CLECs participating in the CCP. The CLEC industry is notified on two to four hour intervals until the resolution is determined. A resolution determination is posted to the CCP website within 24 hours of the outage being reported to the ECS. The final resolution is posted to the CCP website within three days of the outage being reported. The escalation process may be utilized for the status notification, resolution notification, or final resolution notification steps if the time frames are not met and/or the responses are not satisfactory.

Following is an example of a Category 1 outage reported to BellSouth:

Initial Notification	Status Notification	Resolution Notification	Final Resolution
1. ECS received report of outage from CLEC on 5/19/00 at 9:47am. 2. CLEC advised internally performed outage resolution activities. 3. CLEC provided trouble description "Security 2207 process is hung on TAG box 90.70.124.148". 4. ECS assigned case # 421221, class 1at 9:54. 5. ECS internally reports trouble at 9:56/9:57.	6. ECS receives internal report on status of trouble at 9:59.	7. ECS receives notification that internal report trouble is cleared 5/19/00 at 10:00	8. Posted final resolution notification TAG 2207 System Outage #1105 on CCP website at 10:08. Duration shown on website 9am to 10am. 9. 10:09 Sent TAG Trouble email, closing ticket. 10. Ticket closed 10:09.

Q. PLEASE PROVIDE AN EXPLANATION OF A CATEGORY 3 CHANGE REQUEST.

A. A Category 3 defect (I will come back to Category 2) involves a situation where an interface is working, but not in accordance with the way it was designed or in accordance with the business rules published by BellSouth to the CLECs. Category 3 has recently been expanded and now also

includes expedited features, which includes problems that result in the inability of an individual CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. BellSouth calls these situations a defect/expedite feature. The defect/expedite feature is the underlying problem, and what are covered by the CCP are the identification, notification, and resolution processes for defects/expedite features.

Defects/expedite features have the following three Impact Levels:

1) High Impact – failure causes impairment of critical system functions and no electronic workaround solution exists. Expedited features are treated as High Impact.
2) Medium Impact – failure causes impairment of critical system functions; a workaround solution does exist
3) Low Impact – failure causes inconvenience or annoyance

The process, which provides for speedy treatments of defects, is as follows: The identification of the Type-6 defect/expedite can be initiated by BellSouth or the CLECs. The originator and the individual CLEC's Change Control Manager ("CCCM") or the BellSouth Change Control Manager ("BCCM") prepare the change request form with the related requirements and specification attached if appropriate, i.e. Purchase Order Number, Operating Company Name, interfaces affected, error messages, etc. The request should also include a description of the business need and details of the business impact. The request is

submitted to BellSouth via e-mail. Within one business day of receiving the change request, the BCCM will:

1) Log the defect/expedite in the change request log;
2) Send acknowledgement to CLEC;
3) Review for completeness and accuracy;
4) Assign defect/expedite status;
5) Send clarification notification via e-mail to originator if appropriate.

Within the next three business days, the BCCM

1) Validates request is a defect/expedite;
2) Perform internal defect/expedite analysis;
3) Determine appropriate status;
4) Sends defect/expedite notification to CLEC community via e-mail;
1) Posts defect/expedite on CCP website.

Within the next 4 business days, the BCCM will:

1) Identify a defect workaround;
2) Send workaround process to originator via e-mail;
3) Alert CLEC community via e-mail and;
4) Post the workaround process on CCP website or, if appropriate, notify via conference call;
5) Update request on change control log.

Importantly, with a Category 3 defect, the interface is working, but not in

accordance with the BellSouth baseline business requirements or in accordance with BellSouth published business rules and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

The BCCM will provide a status of the defect/expedite at the Monthly Status Meeting and solicit CLEC and BellSouth input if appropriate. The BCCM will schedule and evaluate the defect/expedite based on the business impacts and capacity.

BellSouth will use its best efforts to schedule expedite features in the current release, next release or point release. BellSouth will utilize its best efforts to implement High Impact "validated" defects within a 4 – 25 business day range.

I do want to note that BellSouth has changed its definition of what constitutes a defect, based on its reevaluation of its previous definition during the recent North Carolina proceedings with AT&T. As previously stated, the defect notification process was also recently expanded to include expedited features. BellSouth believes that these changes in the definition of "defect" and the addition of a new category of "expedited features" will help substantially in resolving issues with AT&T related to this subject.

I also want to explain BellSouth's position on the time frames in which an activity will be concluded, since that inevitably is an issue with AT&T. BellSouth has proposed time frames for all of these activities that BellSouth believes, based on its experience, to be reasonable "outside" time limits. BellSouth intends, whenever a time frame is set out for accomplishing a particular step in a process, of accomplishing that step as quickly as possible. If a step takes 20 minutes and a full business day is allotted, the step will take 20 minutes. The problem with all of this is that while we are attempting to categorize problems into neat little pigeonholes, that rarely will be the case. Some problems will take longer than others to resolve, hence the use of outside time frames for the steps.

Q. PLEASE EXPLAIN HOW A PROPOSED CHANGE REQUEST FOR CATEGORY 2 WOULD BE HANDLED.

A. Category 2 is a situation where a change request is submitted to enhance systems, manual and/or business processes. Significantly, Category 2 doesn't involve a system failure or a system that isn't working the way it is suppose to work. A CLEC or BellSouth can determine the need for, and originate, a Category 2 change request. The originator, in conjunction with either the BCCM or the CCCM, submits the change request and the appropriate documentation to BellSouth via e-mail. These change requests follow a normal course of business utilizing the CCP. In other words, these change requests are not treated in an expedited manner. Instead, each is thoroughly assessed and presented to participating

members of the CCP at scheduled meetings for input and prioritization. The process flow as documented in the CCP is described below.

Within two to three days of receipt of the change request, the BCCM takes the following action:

1) Logs the request in change control log;
2) Sends an acknowledgement to the originator via e-mail;
3) Reviews change request for completeness and accuracy;
4) Assigns change request status code;
5) If appropriate, sends clarification to originator via e-mail.

Within the next twenty days, the BCCM performs the following activities:

1) Reviews change request and related documentation for content;
2) Review for impacted areas, such as system, manual process, documentation and adverse impacts;
3) BellSouth may reject the request based on reasons such as, cost, industry direction, or technically not feasible to implement;
4) If rejected, notification provided to originator;
5) If rejected, reason shared with CLECs for input;
6) If rejected and if requested, subject matter expert ("SME") available in Monthly Status Meeting to discuss reason and alternatives;
6) Posts appropriate status on change control log.

Both the BCCM and CCCM, within the next five to seven (5-7) days, prepare for the Change Review Meeting. The BCCM performs the following:

1) Prepares agenda;
2) Makes meeting preparations;
3) Updates current request status on change control log;
4) Prepares and posts change control log to CCP website.

The CCCM performs the following:

1) Analysis pending requests;
2) Determine priorities for change requests and establish desired/want dates;
3) Create draft priority list.

The pending change request is reviewed during the Monthly Status Meeting.

During the Prioritization Meeting, which is conducted as needed based on the published release schedule, the change requests are reviewed, initiators present the change requests, impacts are discussed, requests are prioritized, and the final list of prioritized change requests, also known as the final Candidate Requests list, is developed.

Within two days of the Monthly Status/Prioritization meeting, the current status of the request is updated on change request log, the meeting results prepared and the log and results are posted on the CCP website.

During the next thirty (30) days, BellSouth and the CLECs perform analysis, impact, sizing, and estimating activities for the prioritized items. During this process BellSouth provides requirements and the technical references to the CLECs. Additionally, face-to-face meetings or conference calls, or both, are held by BellSouth and the CLECs to discuss the programming and coding details for the changes.

The next step is the Release Package Meeting. During the meeting, the parties evaluate the proposed release schedule and BellSouth and the CLECs jointly create the Approved Release Package. The non-scheduled change requests are determined and returned to the next scheduled Change Review Meeting. The date of the initial Release Management Project Meeting is established.

Within two days of the Release Package Meeting the following meeting documentation is released.

1) Approved Release Package;
2) Updated Change Request Log;
3) Meeting minutes;
4) Date for initial Release Management Project Meeting.

Q. NOW THAT YOU HAVE DESCRIBED THE PROCESS FOR HANDLING THE CATEGORY 2 CHANGE REQUESTS, PLEASE DESCRIBE HOW THE CHANGES ARE IMPLEMENTED?

A. A Category 2 change to an electronic interface is usually "packaged" with other changes or enhancements to be implemented together in a release. The releases require programming by both the CLECs and BellSouth.

Q. WHEN DOES BELLSOUTH SEND A FORMAL CARRIER NOTIFICATION LETTER OF AN APPROVED INTERFACE CHANGE TO ALL OF THE CLECS?

A. BellSouth formally notifies CLECs of the changes comprising a major release of the electronic interfaces thirty (30) days in advance of implementation. It is important to remember that, long before CLECs are formally notified about changes to the interfaces, the potential changes are first discussed with the participating CLECs during the CCP meetings. All notification letters for 1997-2000 may be reviewed at the Interconnection Website.
http://www.interconnection.bellsouth.com/markets/lec.html

Q. WHAT IS CONTAINED IN THE NOTIFICATION LETTERS TO THE CLECS?

A. The notification letters are intended to summarize the changes being implemented with a particular release and to identify possible "down time" for the impacted interface(s) due to system loading requirements for the release. These letters are not intended to be technical references for use by CLEC software developers. As discussed previously, BellSouth provides CLECs with this information through other sources well in advance of the formal notification.

a) <u>INTRODUCTION OF NEW INTERFACES</u>

Q. NOW LET'S TURN TO THE SUB-ISSUES RAISED IN AT&T'S ISSUES MATRIX, BEGINNING WITH THE INTRODUCTION OF NEW INTERFACES. DOES THE CCP INCLUDE PROCESSES FOR THE INTRODUCTION OF NEW INTERFACES?

A. Yes. The CCP contains the process for the introduction of new interfaces. The process is described on page 35 of the CCP document (Exhibit RMP-5). For the introduction of new interfaces, the document states:

> BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. A description of the proposed interface will be submitted to the BCCM [BellSouth Change Control Manager]. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30–45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a

separate meeting will be scheduled . . .The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC Community.

Thus, the CCP provides BellSouth and the CLECs with a meaningful opportunity to discuss and provide input for the proposed new interfaces. I do want to make it clear, however, that while the introduction of new interfaces is clearly subject to the CCP; the development of new interfaces is not.

Q. WHEN DOES A NEW INTERFACE BECOME SUBJECT TO THE CCP?

A. As documented on page 35 of the CCP, new interfaces are added to the CCP as they are deployed. After that, any requested changes will be managed by the CCP.

Q. WHY DO INTERFACES UNDER DEVELOPMENT NOT FALL UNDER THE CCP?

A. BellSouth must have flexibility to develop interfaces to meet industry standards and regulatory requirements. The process allows for and encourages CLEC input, but new development is too critical to risk being stymied in the process by CLEC disagreement. To ensure efficient and

up-to-date deployment of new interfaces, BellSouth must retain ultimate control of their deployment.

Q. DOES A CLEC HAVE TO BE A USER OF AN INTERFACE IN ORDER TO USE THE CCP?

A. No. A CLEC may place a "letter of intent", indicating that it intends to use an interface, on file with the BellSouth Change Control Management. The letter of intent will serve as the official notification to BellSouth and the other CLEC CCP participants that the CLEC's intention is to use the interface. By doing this the CLEC will be permitted to participate in the submission and prioritization of change requests for that interface. This enhancement is reflected in the CCP document Version 2.0.

Therefore, one of the parameters of the CCP is that a CLEC must be a user of an interface or have a letter of intent on file to request changes to that interface. Since part of the CCP is prioritizing potential changes to an interface, it just makes sense that a CLEC must be a user of an interface or have a letter of intent in order to vote and rank the potential change(s) for that particular interface. This simply recognizes that the CLECs that are either currently using or have officially provided their intention to use these interfaces should have the first say on how the interfaces should be changed. The specific prioritization voting rules are detailed in the CCP document (page 33 of Exhibit RMP-5). Unfortunately, the nature of the CCP is such that if developing interfaces were included in the CCP,

CLECs with no intention of using such interfaces could game the process by voting for additional features and functionality that would increase the time and the cost to BellSouth and rival CLECs to implement them.

b) <u>RETIREMENT OF EXISTING INTERFACES</u>

Q. IS THE RETIREMENT OF EXISTING INTERFACES SUBJECT TO THE CCP?

A. Not per se, but based upon the discussions with interested CLEC participants, language has been added to ensure that BellSouth only retires interfaces that are not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface. As previously mentioned, BellSouth has also proposed language regarding advanced notification of 120 days for the retirement of old *versions* of interfaces.

BellSouth believes that AT&T considers the two parties to now be in general agreement on this issue. This is based upon testimony filed with the Florida Public Service Commission (Docket 000731-TP) by AT&T Witness Jay M. Bradbury. With respect to this issue for the Florida arbitration, Mr. Bradbury states on page 60 of his testimony that "it appears the parties have reached agreement on a portion (of) this issue. This language has been enhanced by BellSouth and is now acceptable to AT&T".

Information on the retirement of interfaces is located on page 35 of the CCP document (Exhibit RMP-5). It states as follows:

> As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.
>
> BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Q. WHY IS THIS POLICY REASONABLE?

A. BellSouth is responsible for providing CLECs with the required OSS functionality. Operational reasons, such as discontinued hardware, software that cannot be upgraded, or lack of use, are legitimate business reasons for retiring interfaces. If retirement were included in change control, CLECs could vote to maintain obsolete or unused interfaces

simply to game the system. BellSouth should not be forced to carry the unnecessary costs of maintaining obsolete or unused systems and indeed, this is not in the CLECs' interest either because the OSS costs would be passed to them.

Q. WHAT PRECAUTIONS WILL BELLSOUTH TAKE TO ENSURE THAT THE RETIREMENT OF AN INTERFACE IS NOT DETRIMENTAL TO CLECS?

A. It is not BellSouth's intent to take an interface out of service that would have a detrimental impact on the CLEC community. BellSouth will take an interface out of service only if the interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface. Furthermore, upon giving notification that an interface is going to be taken out of service, BellSouth will remain open to input from CLECs concerning its decision to retire the interface in question. When it is determined appropriate to retire an interface, BellSouth will ensure that the functionality provided by that interface is available via another means and provide a mechanism to assist in the ease of transition.

c) EXCEPTIONS TO THE PROCESS

Q. WHAT IS YOUR UNDERSTANDING OF THIS ISSUE?

A. AT&T's apparent desire to put "exceptions" to the process under the CCP is difficult to understand. In its draft of the CCP, it has lumped exceptions together with "expedites", but has not differentiated the two in any meaningful way. Evidently, in spite of everything BellSouth has just been discussing regarding the CCP, AT&T wants a process that allows it to simply circumvent the entire CCP if AT&T thinks that step is warranted. I say this because AT&T's draft simply provides no substantive information about what an "exception" might be.

BellSouth feels strongly that all situations that would come before the CCP are covered by one of the defined categories already in the process. The process does not need to add terms and/or categories that have no objective criteria to define them, thereby leaving their meaning open to interpretation.

d) <u>DOCUMENTATION, INCLUDING TRAINING</u>

Q. IS DOCUMENTATION INCLUDED UNDER THE CCP?

A. Yes. Documentation is one of the categories that is included under the CCP, as I described in my introductory remarks about Issue 17. Additionally, documentation defects have been incorporated in the defect/expedite feature definition. Specifically, the documentation included in this process is the business rules for electronic and manual processes relative to pre-ordering, ordering, and maintenance.

Interested CLECs and BellSouth, through collaboration, developed an adequate and thorough process for dealing with documentation. The issue here apparently is AT&T's desire to circumvent the collaborative nature of the process. If AT&T wishes to make changes regarding documentation, it should submit them to the CCP.

Q. WHERE IS TRAINING HANDLED WITHIN BELLSOUTH?

A. Training is handled by BellSouth's CLEC training department. It is not clear why AT&T thinks training should fall under the CCP. BellSouth is responsible for the development and delivery of all CLEC training including related training material and aids. Of course, the training courses that support the interfaces that fall under the CCP will be adapted by the appropriate training development organization as the interfaces are enhanced through the process, if there is a need.

e) DEFECT CORRECTION and

f) EMERGENCY CHANGES (defect correction)

Q. CAN YOU DISTINGUISH THESE TWO ISSUES?

A. A dispute existed about the definition of a defect and that may have given rise to this sub-issue. I believe the disagreement of the definition of a defect has been resolved. As mentioned previously, BellSouth believes a process currently exists within the CCP to deal with true emergencies, which are defined as system outages. Nonetheless, this is among the

issues being addressed as the review of the CLEC- and BellSouth-proposed CCP changes continues.

Q. HOW ARE DEFECTS DEFINED UNDER THE CCP?

A. The definition of defects has been revised. The revised language as stated on page 25 of the CCP document is as follows:

> Any non-Type-1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLEC's ability to exchange transactions with BellSouth. This includes documentation defects.

This revised definition incorporates language to deal with concerns expressed by AT&T. Specifically, the part of the definition, which states "is not working in accordance with business rules ..... to exchange transactions with BellSouth." A defect to documentation or business rules is a condition where the documentation or business rule does not agree or accurately reflect the business environment. BellSouth is also working to incorporate more of AT&T's suggested additions to the defect definition regarding requirements defects.

Q. HOW ARE DEFECTS HANDLED BY THE CCP AND BELLSOUTH?

A. BellSouth is committed to responding to all requests in the manner set forth in the CCP. A workaround will be provided, in most cases, no more than (4) business days after validation of the existence of a defect. Since BellSouth has incorporated this process, BellSouth has actually provided workarounds within three (3) business days. BellSouth has also proposed in its version of the CCP document to reduce workaround cycle times for high-impact defects from four (4) days to two (2) days, while retaining the four-day cycle for medium- and low-impact defects. BellSouth works diligently to provide a response/workaround as quickly as possible. Defect fixes, depending upon the system/customer impacts, are generally implemented in point releases, which means a quicker turnaround for the CLEC.

Q. WHAT DO YOU BELIEVE TO BE THE ISSUE HERE?

A. AT&T takes exception, evidently, to our definition of a defect. Hopefully, this has been resolved.

Q. IS DEFINING A PROBLEM AS A DEFECT OR A NON-DEFECT IMPORTANT?

A. Yes. If it is a defect, it gets the Category 3 treatment described earlier. If it is just something AT&T doesn't like, but does not rise to the level of a defect, it gets Category 2 treatment.

g) <u>AN EIGHT-STEP CYCLE, REPEATED MONTHLY</u>

Q. DOES BELLSOUTH UNDERSTAND WHAT IS AT ISSUE HERE?

A. Yes. As this issue has evolved, it is clearer that AT&T's issue is not with the number of steps (as the issue title seems to imply), but more so with cycle times contained within the steps, per direct testimony filed by AT&T witness Jay M. Bradbury for similar arbitration before the Florida Public Service Commission (FPSC Docket No. 000731-TP, page 63; excerpt attached as Exhibit RMP-20). As discussed previously, AT&T has filed suggested changes to the CCP document in the form of marked-up copies of various versions of BellSouth's CCP Document. Included are AT&T's recommendations for reduced cycle times for some of the steps AT&T feels are necessary in order to meet its perceived business needs.

BellSouth provided feedback for the marked-up CCP Version 2.0 to AT&T and the other member CLECs prior to the December 7, 2000 CCP Monthly Status Meeting, and BellSouth's proposal for a reduction in cycle times is also being considered by the CCP as part of the ongoing collaborative effort. As stated earlier, there are some reduced cycle-time intervals that BellSouth has been able to propose (e.g., two (2) days for the development of a workaround for a high-impact defect), and some

reduced cycle-time intervals proposed by AT&T that BellSouth cannot support (e.g., cutting the review cycle for a change request from 20 to 10 days).

h) A FIRM SCHEDULE FOR NOTIFICATIONS ASSOCIATED WITH CHANGES INITIATED BY BELLSOUTH

Q. DOES THE CCP PROVIDE A "FIRM SCHEDULE" FOR NOTIFICATIONS ASSOCIATED WITH BELLSOUTH-INITIATED CHANGES?

A. Yes. The schedule is outlined on page 20 of the CCP document (Exhibit RMP-5), with a detailed description of the process flow for BellSouth-initiated changes on pages 19-24. As previously noted, and in response to CLEC requests, BellSouth has also proposed changes in the notification process regarding user requirements for software releases (90 and 45 days advance notification for draft and final requirements, respectively), new TCIF mapping (180 days advance notification for implementation release date, and 120 and 60 days advance notification for draft and final requirements, respectively), and retirement of interfaces (120 days advance notification for the retirement of old versions of interfaces).

Another change regarding notifications to which BellSouth has agreed is related to documentation for non-system-affecting documentation. The current CCP 2.0 document states that BellSouth will provide this documentation a minimum of five (5) days in advance of the

implementation of a change related to the documentation, and that system-affecting documentation will be provided a minimum of 30 days in advance of the implementation. In response to CLEC requests, BellSouth will now provide all documentation 30 days in advance. This agreement to change is reflected in the minutes of the December 7, 2000 Process Improvement Meeting minutes (Exhibit RMP-14).

Q. BECAUSE THE CCP CONTAINS A SCHEDULE FOR NOTIFICATIONS, DOES BELLSOUTH UNDERSTAND WHY THIS IS AT ISSUE?

A. No. We conclude that AT&T is simply unhappy with the schedule established through collaboration by CLECs and BellSouth operating under change control, and that AT&T is attempting to circumvent the collaborative nature of the process through this arbitration. If AT&T wishes to make changes regarding the scheduling of notifications, it should submit its proposed changes to the CCP. Indeed, that has been done with regard to AT&T's issues – with resulting changes.

Q. IS BELLSOUTH COMMITTED TO USING THE CCP TO INITIATE CHANGE REQUESTS?

A. Yes, of course. BellSouth is committed to using the process to initiate change requests, and, in fact, has already submitted numerous change requests. The Change Control log (available via the Change Control Process website) shows that BellSouth has initiated 26 change requests

for various improvements to the ordering process, and originated 15 change requests to correct various types of system and documentation defects that BellSouth has discovered (through December 1, 2000).

i) A PROCESS FOR DISPUTE RESOLUTION INCLUDING REFERRAL TO STATE UTILITY COMMISSIONS OR COURTS

Q. DOES THE CCP INCLUDE DISPUTE RESOLUTION?

A. Yes. A dispute resolution process was established as part of the expansion of the CCP, and a description is contained in the CCP document on page 40. In brief summary, the process is as follows: In the event that an issue is not resolved through the CCP's escalation process, BellSouth and the affected CLEC (or CLECs) will form a Joint Investigative Team of Subject Matter Experts within one week. The team will conduct a root cause analysis to determine the source of the problem, and then develop a plan to remedy it. Each party to the dispute must escalate the issue within each company to the person with the authority to resolve the issue.

Q. IF THE DISPUTE CANNOT BE RESOLVED AFTER ALL THESE STEPS, THEN WHAT OPTIONS ARE AVAILABLE?

A. As stated in the CCP document (Exhibit RMP-5) on page 40, if the dispute cannot be resolved after these steps, then either party may file a formal complaint for binding mediation with the Director of Telecommunications,

or the appropriate state official. According to the CCP, the complaint should be ruled upon within thirty (30) days of the filing, although we obviously recognize that this is solely within the Authority's discretion. If either party is then aggrieved, it may file a formal complaint with the state public service commission. It should be noted that this language has been introduced as part of the Interim CCP. We recognize, however, that this language may require refinement in order to be appropriate for Tennessee.

j) A PROCESS FOR ESCALATION OF CHANGES IN PROCESS

Q. DO YOU UNDERSTAND WHAT IS AT ISSUE HERE?

A. Yes. This is another example of how an issue can work toward resolution through the collaborative CCP. At first, AT&T's concern here was the lack of a well-defined escalation process. Through the CCP – and with AT&T's involvement – such an escalation process has been developed, and an overview of the process is presented below.

Although AT&T now agrees in concept with the escalation process, AT&T has found yet another concern. In its marked-up CCP Version 2.0, AT&T has recommended specific intervals for some of the steps to better regulate – from AT&T's perspective – the attention given to escalations based upon the severity of the impact of the issue. Appropriately, the CCP is also reviewing AT&T's proposed intervals, while considering BellSouth's proposed intervals.

BellSouth has proposed what it feels are reasonable time intervals for each cycle of the escalation process, and they can be found on pages 58 and 62 of Exhibit RMP-18. In summary, BellSouth has proposed the following:

Type-1 issues:	1-day turnaround
Types 2-5 issues:	5-day turnaround
Type-6 High Impact issues:	2-day turnaround
Type-6 Medium and Low Impact issues:	5-day turnaround
Types 4-5 Expedite Process issues:	3-day turnaround

Q. PLEASE DESCRIBE THE CCP'S ESCALATION PROCESS.

A. The guidelines for the escalation process are on page 33 of the CCP document (Exhibit RMP-5). The CCP document provides as follows:

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.

The contacts and the processes for each type of change request are located on pages 34-36. To summarize:

Type-1 change requests (System Outages) would be escalated through three levels of the Electronic Communications Support Group-Interconnection Operations by the CLEC.

Types-2-6 change requests would be escalated through the Change Control Team who would direct Business Rules, Operations Issues, and System Issues to the appropriate Director within BellSouth.

k) ***A PROCESS FOR CHANGING THE PROCESS***

Q. DOES THE CURRENT VERSION OF THE CCP DOCUMENT ADDRESS A PROCESS FOR CHANGES TO THE PROCESS?

A. Yes. Section 9.0 of the current Version 2.0 of the CCP document specifies that requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager ("BCCM") for review by the CCP, using the Change Request form located in Appendix A of the CCP document. CCP process change requests are reviewed at the monthly Change Review meetings.

Q. ARE THERE CURRENTLY ANY PROPOSED CHANGES TO THE PROCESS UNDER CONSIDERATION BY THE CCP?

A. Again, yes. As previously discussed, AT&T itself submitted a CCP Change Request (Log # CR0171 – September 9, 2000) under the provisions of Section 9.0 of the current CCP document. That request led to the formation of a CLEC subcommittee that has recommended a vast number of changes to the process, including changes to Section 9.0. The aforementioned "marked-up version" of CCP 2.0 has been presented to the CCP, and, as discussed earlier, BellSouth has now provided its own proposed changes (Exhibit RMP-18) in response to and in conjunction with those of the CLECs. When agreement is reached within the CCP as to which proposed changes will occur, the current CCP Version 2.0 will be updated accordingly and posted to the CCP web site.

Q. WHAT DOES BELLSOUTH WANT THE AUTHORITY TO DO TO RESOLVE THE VARIOUS PARTS OF ISSUE 17 THAT HAVE BEEN PRESENTED?

A. First, BellSouth believes that the Authority should do nothing, finding that the CCP should be handled collaboratively between the CLECs and BellSouth. Second, if the Authority wants to address any particular part of the CCP, BellSouth requests that the Authority simply make recommendations rather than impose requirements on the process that will affect a number of CLECs other than AT&T. If, however, the Authority want to address each individual dispute between BellSouth and the AT&T, BellSouth suggests that the simplest way to do this is to simply compare AT&T's marked-up copy of Version 2.0 of the CCP to BellSouth's marked-

up copy of that same version. The dispute between the parties is clearly illustrated in those documents. Based on the evidence provided, the Authority should be able to determine which party's language would be most appropriate, thus facilitating a resolution of this issue.

Issue 18: What should be the resolution of the following OSS issues currently pending in the change control process but not yet provided?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. As stated earlier, BellSouth's position is that the CCP, and, therefore, any issues pending before the CCP, are not appropriate for this arbitration. All requests for enhancements to BellSouth's electronic and manual interfaces should be submitted via the CCP. As I stated in Issue 17 above, the CCP is a collaborative process established between BellSouth and interested CLECs to manage changes to interfaces. OSS issues submitted to the CCP must be dealt with by BellSouth and all of the CLECs participating in CCP, not just BellSouth and AT&T. Moreover, should the Authority decide to consider these topics, BellSouth requests that the Authority only give guidance on these issues, rather than requiring a result that may be in conflict with a decision in another state.

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON THIS ISSUE?

A. As BellSouth understands AT&T's position, AT&T is attempting to circumvent the CCP for the issues described in Issue 17. This would allow AT&T to gain an unfair advantage over the other CLECs that adhere to the regional CCP.

Q. WILL BELLSOUTH PROVIDE THE STATUS OF EACH REQUEST LISTED IN ISSUE 18, EVEN THOUGH THE ISSUE IS NOT APPROPRIATE FOR THIS ARBITRATION?

A. Yes. Although we do not think it appropriate to resolve in this proceeding, I will address each item AT&T included in its position statement. AT&T divided this issue into sub-parts (a) - (c). I will address each of the items listed in the same manner.

Sub-part (a) Parsed Customer Service Records ("CSR") for Pre-ordering

Q. WHAT DOES "PARSE" MEAN?

A. To parse means to receive a stream of data from the Customer Service Record ("CSR") and break down that data into certain fields for further use.

Q. WHAT HAS THE FCC SAID ABOUT AT&T's INTERPRETATION OF THE BELL ATLANTIC ORDER AS IT RELATES TO PARSING?

A. In its Southwestern Bell Texas order, footnote 413, the FCC stated that "Contrary to AT&T's interpretation of the *Bell Atlantic New York Order*, see AT&T Texas I Dalton/DeYoung Decl. At para. 95, we have not previously stated that a BOC must perform parsing on its side of the interface."

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF WHAT AT&T REFERS TO AS A PARSED CSR?

A. Based on BellSouth's understanding, AT&T is referring to the level to which the CSR information is provided for parsing in the TAG pre-ordering interface. AT&T wants "sub-line" parsing of the CSR data to a level that goes beyond the level used and retained by BellSouth for itself. BellSouth currently provides the CLECs a stream of data via the machine-to-machine TAG pre-ordering interface based on the Common Object Request Broker Architecture ("CORBA") industry standard. The stream of data is identified by section with each line uniquely identified and delimited. This data is provided to CLECs in the same manner as it is to BellSouth's Retail units.

BellSouth, for example, retains the customer's listed name as a complete field - my listed name is "Pate, Ronald M". AT&T apparently wants "sub-line" parsing of "Pate, Ronald M" into three separate fields: last name

("Pate"), first name ("Ronald"), and middle initial ("M."). This level of parsing can be programmed by AT&T on its side of the interface. The bottom line is that BellSouth provides CLECs with the CSR information in a non-discriminatory format. BellSouth, therefore, has met its obligations regarding parsing.

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON SUB-PART A OF THIS ISSUE?

A. In its petition and exhibits, AT&T claims that BellSouth should provide a parsed CSR pursuant to industry standards. AT&T further claims the parsed CSR has been an industry standard since the publication of the Local Service Ordering Guidelines Issue 3 ("LSOG 3"), thus suggesting that we should have already implemented what AT&T is requesting.

Q. DEFINE 'LSOG', AND EXPLAIN BELLSOUTH'S POSITION REGARDING LSOG.

A. LSOG, or Local Service Ordering Guidelines, is the set of guidelines for CLECs to use when ordering local service. The guidelines were originally established in accordance with the consensus approval of the industry-recognized Order and Billing Forum (OBF). BellSouth readily adopted - and has fully supported – the OBF recommendations with few exceptions regarding conflicts with BellSouth's legacy systems or established

processes. BellSouth currently supports LSOG Version 4 forms for manual ordering.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS SUB-PART?

A. As explained in detail below, BellSouth provides CLECs the CSR data in the same manner that it provides the data to itself for use by the BellSouth retail units.

Q. HAVE THE CLEC ELECTRONIC INTERFACES BEEN UPGRADED TO LSOG 4?

A. Yes. The interfaces were upgraded from the Telecommunications Industry Forum Issue 7 ("TCIF7") to TCIF Issue 9 ("TCIF9") and parts of TCIF Issue 10 in January 2000 when OSS99, which is based on LSOG 4, was implemented. The OSS99 enhancement consists of the "best of" TCIF Issue 8, TCIF Issue 9 and TCIF Issue 10, as selected by the CLECs participating in the EICCP and BellSouth. Approximately two years ago, BellSouth conducted meetings with the CLECs via the EICCP to discuss the impact of moving from TCIF7 to TCIF9 (LSOG 4). Because of the major efforts required to upgrade from TCIF7 to TCIF9, a decision was made by the members of the EICCP, which included AT&T, to implement the components that were most critical to the CLECs. The subparsed CSR requested by AT&T was not included in this enhancement.

Q. HAS A CHANGE REQUEST FOR PARSED CSRS BEEN SUBMITTED TO THE CCP?

A. Yes. AT&T submitted a Change Request, Log # TAG0812990003, on August 12, 1999, requesting that BellSouth deliver a parsed CSR as part of the pre-ordering functionality.

Q. WHAT IS THE STATUS OF THIS CHANGE REQUEST?

A. AT&T's Change Request was presented during the September 28, 1999 CCP Enhancement Review Meeting and prioritized as one of eleven pending change requests to be considered for implementation in 2000. During the November 30, 1999 CCP Release Planning Meeting, this Change Request was updated for planning and analysis to begin in mid-2000. This pending change request was reviewed during the March 29, 2000 CCP Monthly Status Call and it was decided a sub-team would be formed during 2000 to investigate the implementation of sub-parsed CSR. This change request was prioritized as the number one pre-ordering request during the June 28, 2000 Change Review Meeting.

The sub-team has been formed; and it includes representatives from BellSouth and the CLEC CCP participants. The initial Parsed CSR team meeting was conducted on October 3, 2000, and subsequent sub-team meetings were held on October 19, 2000 and November 16, 2000. The September 28, 1999 meeting minutes are included as Exhibit RMP-21; the

minutes from the March 29, 2000 call are Exhibit RMP-22; the minutes from October 3, 2000 meeting are Exhibit RMP-23; the minutes from the October 19, 2000 meeting are Exhibit RMP-24; and the minutes from the November 16, 2000 meeting are RMP-25.

On December 12, 2000, an e-mail was sent to participating CCP CLECs, asking for comments on the work done by the sub-team after the November 16 meeting. Attached to the e-mail were the following documents: an updated Change Request, the November 16 Sub-Team Meeting minutes, the Parsed CSR Action Item Log, CLEC User Requirements, and a tentative Parsed CSR Implementation Timeline. Comments are due by January 10, 2001, and a conference call has been scheduled for mid-January 2001 to review the project and the timeline.

I would note that while the time frames mentioned above may seem lengthy, it is the CLECs that prioritize the changes that are addressed and implemented. The time frames that have resulted are the consequence of the CLECs themselves placing more important or critical changes ahead of the change request for parsing, particularly with regard to the OSS99 release where other changes were made.

Q. EXPLAIN HOW THE CLECS CAN PARSE THE CSR VIA TAG.

A. The TAG pre-ordering interface can be integrated with the TAG ordering interface or the Electronic Data Interexchange ("EDI") ordering interface.

The CSR data that is delivered to the CLEC via TAG can be further parsed by the CLEC to exactly the level needed on an order, just as BellSouth parses CSRs in its own retail operations.

Q IF THE CLEC INTEGRATES THE TAG PRE-ORDERING INTERFACE WITH ITS TAG OR EDI ORDERING INTERFACE AND WITH ITS OSS, WILL THE CSR INFORMATION OBTAINED VIA TAG "FLOW INTO" ITS OWN OSS?

A. Yes, that is the purpose of integratable, machine-to-machine interfaces. CLECs, such as AT&T, can integrate the TAG pre-ordering interface with the TAG ordering interface or the EDI ordering interface. CLECs can integrate these interfaces with their own internal OSS. Integration allows the CLECs the ability to manipulate the data obtained via the TAG pre-ordering interface. This includes the ability to further parse the CSR. The data can be manipulated so that it will "flow into" a CLEC's OSS.

Q. DOES AT&T NEED A PARSED CSR TO INTEGRATE ITS OWN SYSTEMS WITH BELLSOUTH'S?

A. No. As I explained previously, BellSouth provides CLECs the ability to parse information on the CSR, using the integratable machine-to-machine TAG pre-ordering interface. The TAG gateway transmits the CSR information as a stream of data, which a CLEC can parse to the same line level using the same unique section identifiers and delimiters that

BellSouth does for itself. Furthermore, BellSouth does provide "sub-line" parsing of the end user's address during the address validation process in TAG. Thus, TAG allows CLECs to parse CSRs in the same way that BellSouth Retail systems parse CSRs, and AT&T needs nothing further.

Sub-part (b) Electronic Ordering of All Services and Elements

Q. BEFORE ADDRESSING SUB-PART B, WILL YOU PROVIDE A DEFINITION OF THE MANUAL SUBMISSION AND ELECTRONIC SUBMISSION WITH SUBSEQUENT MANUAL HANDLING METHODS OF SUBMITTING LSRS?

A. Yes. Manual submission refers to the manual or non-electronic submission of LSRs. Manual submission of LSRs can be accomplished by facsimile. The manual submission is a result of the fact that the services ordered require substantial manual handling and cannot be submitted electronically. Alternatively, some CLECs may simply choose not to utilize BellSouth's electronic interfaces, even though the request may be submitted electronically.

Electronic processing with subsequent manual handling means the LSRs may be submitted electronically by the CLEC but the requested service orders are designed to "fall out" for manual handling by the LCSC. This "fall out" results from the fact that the requested services are complex or for other specified reasons, such as a request to expedite the order. After these LSRs are transmitted to BellSouth via the electronic interface, they

are handled as if they were faxed, couriered or mailed to the LCSC. I will discuss each method of submission in detail later in my responses to sub-parts (b) and (c).

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON SUB-PART B OF THIS ISSUE?

A. As BellSouth understands AT&T's position, AT&T is asking that BellSouth provide it the ability to submit "all" LSRs electronically.

Q. WHAT IS BELLSOUTH'S POSITION ON SUB-PART B OF THIS ISSUE?

A. BellSouth's position is that non-discriminatory access does not require that all LSRs be submitted electronically and involve no manual processes. BellSouth's own retail processes often involve manual processes, as I will describe below, and therefore there is no requirement that every LSR has to be submitted electronically in order to provide non-discriminatory access.

However, before I discuss this issue any further, I want to state again that all change requests for BellSouth's electronic and manual interfaces should be submitted via the CCP. OSS issues subject to the CCP are not appropriate for this arbitration. These issues must be dealt with by BellSouth and all of the CLECs participating in the CCP, not just by AT&T and BellSouth in an arbitration such as this one.

Q. BY THE WAY, HAS A CHANGE REQUEST BEEN SUBMITTED VIA THE CCP FOR THIS ELECTRONIC SUBMISSION OF ALL LSRS?

A. To BellSouth's knowledge, no such a change request has been submitted to the CCP.

Q. CAN YOU ELABORATE ON YOUR EARLIER REMARK THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY?

A. Yes. As I stated in my position, non-discriminatory access does not require that all LSRs be submitted electronically. Many of BellSouth's retail services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. Non-discriminatory access to certain functions for CLECs legitimately may involve manual processes for these same functions. Therefore, these processes are in compliance with the Act and the FCC's rules.

Q. PLEASE DESCRIBE HOW BELLSOUTH'S COMPLEX SERVICE REQUESTS ARE MANUALLY HANDLED FOR BELLSOUTH AND CLECS.

A. There are two types of complex services: "Non-designed" and "Designed." A "Non-designed" service is a class of service with a Universal Service

Order Code ("USOC") that does not require special provisioning and is served by one central office or wire center. A "Designed" service involves special engineering and provisioning.

An example of a "Designed" complex service for which retail handling is not fully mechanized is Multiserv® service. This is a complex service available to both BellSouth's retail customers and to resellers. In the case of MultiServ®, the pre-ordering processes are largely manual. These manual pre-ordering processes are substantially the same for both retail and CLEC orders. Orders for retail services are handled primarily by the appropriate business unit for retail services -- BellSouth Business Systems ("BBS") account teams. Orders for CLEC services are handled by the appropriate business unit for CLEC services – CLEC account teams that are part of Interconnection Services ("ICS"). The ICS account team's handling of complex services for CLECs is substantially the same as BBS's account team handling of complex services for BellSouth's retail customers; they both use substantially the same processes as described below.

Attached to my testimony is Exhibit RMP-26, which depicts the flow of the process for ordering MultiServ® service by CLECs and Exhibit RMP-27, which depicts the flow of the process for ordering MultiServ® by BellSouth's retail unit. To perform the pre-ordering activity for complex services, which is known as a "service inquiry", a systems designer on the appropriate BBS or ICS account team fills out an extensive paper form

and then provides that form to a project manager for further manual activities. On approval of either the retail customer or the CLEC, as appropriate, the paper service inquiry is re-initiated as a firm order, which also is an extensive paper form with subsequent manual distribution. In both the retail and the resale cases, the Firm Order Package is manually handed off to the service center, where paper service order worksheets are created to assist in initiating service orders in the ordering system. At that point, orders are typed into the appropriate order systems – ROS for the BellSouth Retail order and DOE for the CLEC order. The order entry is handled in substantially the same manner for both the retail and the resale situations, and thus, does not result in a different customer "experience" in either case. The person who enters the complex order in BellSouth's systems never has any contact with the end-user customer, whether the customer belongs to a CLEC or BellSouth. After the service order is input, the account team and project manager are notified by e-mail of the service order numbers and due dates. The account team manually reviews the service order for accuracy and follows up as necessary. These processes, with their substantial reliance on manual handling and paper forms, are common to both retail and CLEC orders. Thus, BellSouth provides to CLECs the ability to order complex services in substantially the same time and manner as it provides to its retail customers.

Q. PLEASE DESCRIBE THE EDITING AND FORMATTING FUNCTIONS CONTAINED IN THE SERVICE ORDER INTERFACES USED BY BELLSOUTH'S CONSUMER SERVICES RETAIL UNIT.

A. RNS is the primary interface used by BellSouth's Consumer Services retail unit. The presentation layer of RNS interfaces with the process layer and several databases to create service requests. Two of the databases, with which the presentation layer of RNS interfaces, are the Service Order Language Analysis Routine ("SOLAR") and the FID USOC Editing Library ("FUEL"). FUEL contains rules associated with service request generation and a table for the translations of USOCs and FIDs to English. Those rules include a copy of the Service Order Edit Routine ("SOER") service order edits applicable to orders issued through RNS and mirror edits applied within the Service Order Communications System ("SOCS"). SOLAR uses these rules in FUEL to construct and generate service request with minimal errors.

Q. CAN AT&T AND OTHER CLECS PROVIDE THESE SAME EDITING AND FORMATTING FUNCTIONS FOR THEIR INTERFACE OF CHOICE?

A. Yes. AT&T can build the same editing and formatting functions on its side of the interface using information supplied by BellSouth. BellSouth business rules for pre-ordering are contained in the BellSouth Pre-Order Business Rules, the BellSouth Pre-Order Business Rules Appendix, and the BellSouth Pre-Order Business Rules Data Dictionary. BellSouth's

business rules for placing electronic and manual LSRs are contained in the BellSouth Business Rules for Local Ordering document. The business rules for the SOER edits are contained in these guides on the BellSouth Interconnection website: (http://www.interconnection.bellsouth.com/guides/guides-p.html).

A CLEC such as AT&T can use this information to program the electronic interfaces on their side of the gateway to perform the exact same functionality performed by SOLAR/FUEL to ensure LSR submissions with minimal errors. The availability of the information to the CLEC also gives the CLEC the ability to customize their application for those SOER edits that are unique to the services being ordered based on their business plan. For those not desiring to make such an investment, most all of the SOER edits are applied in LESOG. If an LSR does not "pass" LESOG's checks, the LSR will be sent back instantly electronically to the CLEC for clarification ("auto-clarified") for the most common CLEC-caused errors.

Sub-part (c) Electronic Processing after Electronic Ordering without Subsequent Manual Processing by BellSouth Personnel

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON SUB-PART C?

A. As I understand this issue, AT&T is requesting that all complete and correct LSRs submitted electronically flow through BellSouth systems without manual intervention.

Q. WHAT IS BELLSOUTH'S POSITION ON SUB-PART C?

A. Non-discriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without manual intervention.

Q. WHAT IS FLOW-THROUGH?

A. Flow-through for a CLEC LSR occurs when the complete and correct electronically-submitted LSR is sent via one of the CLEC ordering interfaces (EDI, TAG, or LENS), flows through the mechanical edit-checking and LESOG system, is mechanically transformed into a service order by LESOG, and is accepted by the SOCS without any human intervention.

Q. HAS ANY CLEC SUBMITTED A CHANGE REQUEST REGARDING THIS ISSUE TO THE CCP?

A. No. To BellSouth's knowledge, no such change request has been submitted to the CCP. As I have discussed previously, BellSouth's position is OSS issues subject to the CCP are not appropriate for this arbitration. AT&T is attempting to avoid the CCP. All requests for enhancements to BellSouth's electronic and manual interfaces should be submitted via the CCP.

Q. IS IT FEASIBLE FOR LSRS FOR ALL COMPLEX SERVICES TO BE SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE BELLSOUTH SYSTEMS?

A. No. As I discussed in sub-part (B), many of BellSouth's retail services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. The orders at issue here are those that the CLEC may submit electronically, but fall out by design. In most cases these orders are complex orders. For certain orders, BellSouth has, for the ease of the CLEC, allowed them to be submitted electronically even though such orders are then manually processed by BellSouth. The specialized and complicated nature of complex services, together with their relatively low volume of orders as compared to basic exchange services, renders them less suitable for mechanization, whether for retail or resale applications. Complex variable processes are difficult to mechanize, and BellSouth has concluded that mechanizing many lower-volume complex retail services would be imprudent for its own retail operations, in that the benefits of mechanization would not justify the cost. Because the same manual processes are in place for both CLEC and BellSouth retail orders, the processes are competitively neutral, which is exactly what both the Act and the FCC require.

Q. WHAT ARE THE REASONS THAT ELECTRONICALLY SUBMITTED ORDERS FALL OUT FOR MANUAL HANDLING?

A. There are two main reasons that electronically submitted orders fall out for manual handling. The first reason is that the Local Exchange Service Order Generator ("LESOG") has not been programmed to handle requests for certain types of products and services, typically complex services. Another example might be the inability to justify the economics of programming for some types of low ordering volume products and services.

The second reason for fallout concerns unique circumstances related to the LSR. Requests with pricing plans specific to the CLEC, requests which have other related requests being processed, and subsequent requests on an account prior to the new telephone number being posted to the billing system are all examples of LSRs that are subject to fallout due to unique circumstances.

Q. DOES THE FCC REQUIRE THAT ALL LSRs BE SUBMITTED ELECTRONICALLY WITHOUT MANUAL INTERVENTION?

A. No. Non-discriminatory access does not require that all LSRs be submitted electronically, and, further, the FCC doesn't require that all electronically submitted LSRs have to flow through without manual intervention. In its approval of in-region interLATA services for both

Southwestern Bell Telephone Company for Texas (paragraph 180) and Bell Atlantic for New York (footnote 488), the FCC recognized that some services could properly be designed to fall out for manual processing.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 18.

A. I will summarize Issue 18 as follows:

1) Issue 18 is not appropriate for this arbitration.

2) A Change Request is pending in the CCP for a subparsed CSR. This is an active element before the CCP and will be resolved there.

3) Non-discriminatory access does not require that all LSRs be submitted electronically. Some of BellSouth's services, primarily complex services, require manual handling.

4) BellSouth is providing non-discriminatory access for CLECs to its OSS functions. Non-discriminatory access does not require that all LSRs be submitted electronically *and* flow through BellSouth's systems without manual intervention.

Issue 19: Should BellSouth provide AT&T with the ability to access, via EBI/ECTA, the full functionality available to BellSouth from TAFI and WFA?

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON THIS ISSUE?

A. AT&T states that it wants BellSouth to make the Trouble Analysis and Facilitation Interface ("TAFI") functionality available in the industry standard Electronic Communications Trouble Administration ("ECTA") Gateway interface. What I believe AT&T really wants is an integratable interface with all of the functionality currently available in TAFI. In other words, AT&T wants its representatives to be able to input a trouble report, receive the trouble screening and status and at the same time have the trouble information populate AT&T's internal backend OSS systems. In actuality, AT&T wants an entirely new non-industry standard machine-to-machine maintenance and repair interface. TAFI is a human–to-machine interface, while ECTA is a machine-to-machine interface.

Q. WHAT IS BELLSOUTH'S POSITION?

A. BellSouth currently provides CLECs with non-discriminatory access to its maintenance and repair OSS functions through the TAFI and the ECTA Gateway, and therefore meets its obligations under the Act and the FCC Rules.

Q. PLEASE DESCRIBE HOW THESE INTERFACES PROVIDE NON-DISCRIMINATORY ACCESS.

A. The following chart demonstrates that CLECs have the same access to BellSouth's maintenance and repair OSS that BellSouth has for itself.

BellSouth Retail Interfaces	Repair & Maintenance Functions	Interfaces offered to CLECs
Residential TAFI Business TAFI	Full repair & maintenance functionality for telephone number-based (non-designed circuit) services	CLEC TAFI
	Industry standard functionality for telephone number-based (non-designed circuit) services (T1/M1 local)	ECTA Local*
WFA-C	Repair & maintenance functionality for designed circuit services (access to WFA system)	ECTA Local*

*BellSouth offers the EC-CPM human-to-machine interface to CLECs that do not wish to build a machine-to-machine interface.

Q. IN ITS RECENT ORDER APPROVING BELL ATLANTIC NEW YORK'S APPLICATION FOR LONG DISTANCE, WHAT DID THE FCC DETERMINE REGARDING BELL ATLANTIC'S MAINTENANCE AND REPAIR INTERFACE?

A. In paragraph 215 of its Memorandum Opinion and Order CC Docket No. 99-295 released on December 22, 1999 ("Bell Atlantic Order"), the FCC stated that it specifically disagreed with "AT&T's assertion that Bell Atlantic must demonstrate that it provides an integratable, application-to-application interface for maintenance and repair." The FCC further found that, although it did not offer a machine-to-machine maintenance and

repair interface when it filed, "Bell Atlantic satisfie[d] its checklist obligation by demonstrating that it offers competitors substantially the same means of accessing maintenance and repair functions as Bell Atlantic's retail operations." Bell Atlantic accomplished this by providing CLECs with a Web-based GUI. BellSouth accomplishes this by providing TAFI and ECTA to CLECs. As shown above and described below, BellSouth provides CLECs with electronic access to its maintenance and repair OSS in a manner that far exceeds what is provided by the Web-based graphical user interface ("GUI") that Bell Atlantic had in place when it was approved by the FCC.

Q. PLEASE DESCRIBE THE ECTA INTERFACE.

A. ECTA uses the T1/M1 national standard for local exchange trouble reporting and notification. This machine-to-machine interface provides access to BellSouth's maintenance OSS supporting both telephone-number and circuit-identified services - i.e., designed and non-designed services. It supports both resold services and UNEs. Following the industry standard for local exchange trouble reporting and notification, the following functions are available to users of ECTA:

- the ability to enter a report;
- the ability to modify a report;
- the ability to obtain status information during the life of the report; and
- the ability to cancel a report.

Q. PLEASE DESCRIBE BRIEFLY THE STANDARDS USED FOR ECTA.

A. ECTA is built on the ANSI standards T1.227, T1.228 and T1.262. These standards were defined by the Electronic Communications Implementation Committee ("ECIC"), a subcommittee of the Alliance for Telecommunications Solutions ("ATIS") – the primary body addressing industry standards and guidelines in these areas, for the exchange of maintenance and repair data. The ANSI standards upon which ECTA is built do not support gathering all of the various data elements requested by AT&T nor do they support the real time interactive human-to-machine interface necessary to deliver true "TAFI" functionality.

Q. IS AT&T A CURRENT USER OF ECTA?

A. No. AT&T Local (the CLEC) initiated production utilization of the BellSouth ECTA interface on March 18, 1998. On April 9, 1998 AT&T Local terminated the use of this interface. Furthermore, AT&T has declined to participate in the Florida OSS Third Party Testing for ECTA.

Q. PLEASE DESCRIBE THE TAFI INTERFACE.

A. CLEC TAFI is a user-friendly, real time human-to-machine repair and maintenance interface that often enables trouble reports for non-designed services to be cleared by the repair attendant handling the initial customer

contact, frequently with the customer still on the line. Since the CLEC TAFI interface was introduced to CLECs in March 1997, CLEC TAFI has had exactly the same functionality as the TAFI residential interface or the TAFI business interface used by BellSouth. All upgrades to the two BellSouth TAFI interfaces and CLEC TAFI interface have occurred in parallel.

CLEC TAFI combines functionality for both residential and business services, while BellSouth must use separate TAFI interfaces for its residential and business retail units. TAFI was designed by BellSouth to improve customer service by mechanically performing the traditional screening function, and in many cases actually resolving the reported trouble condition, while the customer remained on the line. This is possible because TAFI correctly screens 80% of the reports for non-designed services while the customer is on the line.

Q. WHAT ARE THE MAIN DIFFERENCES BETWEEN TAFI AND ECTA, AS EACH PRESENTLY EXISTS?

A. The first difference, as previously discussed, is TAFI is a human-to-machine interface and as such is not integratable, as opposed to the machine-to-machine ECTA. While TAFI is a human-to-machine interface, TAFI is the front-end system to the Loop Maintenance Operations System ("LMOS"). LMOS provides a mechanized means for maintaining customer line records and for entering, processing and tracking trouble reports. In

addition, TAFI interfaces with various BellSouth back-end legacy systems as part of gathering the relevant information for trouble screening and provides a recommendation/resolution to the problem condition. As for ECTA, the entered trouble ticket is mechanically routed to LMOS; however, the automated trouble ticket screening functionality is not provided. While it can be said that TAFI is integratable (interfaces) with BellSouth's back-end legacy systems, TAFI is not integrated with BellSouth's marketing and sales support systems, RNS and ROS. As the front-end system to LMOS, TAFI provides access to information about the trouble reports of CLECs' end users just as it does for BellSouth's end users. BellSouth, therefore, provides TAFI to CLECs as it does for itself. If a CLEC wishes to populate its own maintenance and repair databases with trouble report and resolution information, they can use ECTA. As a machine-to-machine interface, the CLEC can integrate ECTA with its internal OSS.

The second difference deals with the functionality of the interfaces. TAFI and ECTA both provide the functionality to enter a trouble report, modify the trouble report, obtain status information during the life of the trouble report, and cancel the report for non-designed services. ECTA, however, provides this functionality for both designed and non-designed services whereas TAFI's functionality is limited only to non-designed services. Additionally, for non-designed services, TAFI has the intelligence to execute the appropriate test for that telephone number or retrieve the relevant data to help analyze the problem reported. For example, if a

customer were to report that the customer's call forwarding feature was not working, the TAFI system would check the customer's records to see if the line should be equipped with the call forwarding feature. If verified that the line should be equipped, TAFI would then electronically verify whether the feature has been programmed in the switch serving that customer's line. Once the TAFI analysis of the trouble is complete, TAFI provides a recommendation of what is needed to correct the problem and in some cases implements the corrective action. ECTA does not provide this "on-line" resolution capability.

The final difference deals with industry standards. As previously discussed ECTA is built on the ANSI standards T1.227, T1.228 and T1.262. TAFI is not a standards-based interface. This is important as it relates to AT&T's issue. If TAFI functionality were built into ECTA, then ECTA would no longer be a standards-based interface. In addition, it would add considerable costs that would be borne by all CLECs although AT&T is the only CLEC that has expressed interest for such.

Q. DID THE FCC ADDRESS THE INTEGRATION OF THE MAINTENANCE AND REPAIR INTERFACES IN ITS MEMORANDUM OPINION AND ORDER CC DOCKET NO 00-65 RELEASED ON JUNE 30, 2000 ("SWBT ORDER")?

A. Yes. The FCC, in paragraph 203 of its SWBT order, concluded "that SWBT offers maintenance and repair interfaces and systems that enable

a requesting carrier to access all the same functions that are available to SWBT's retail representatives." "Both the [applicable to applications Electronic Bonding Trouble Administrative interface] EBTA and [Graphical User Interface Toolbar Trouble Administration interface] Toolbar interfaces flow directly into SWBT's back-end OSS systems and enable competing carriers to perform the same functions, in the same manner, that SWBT's retail operations perform."

In footnote 565 of the SWBT order, the FCC further "determined that a BOC is not required, for the purpose of satisfying checklist item 2, to implement an application-to-application interface for maintenance and repair functions – provided it demonstrates that it provides equivalent access to its maintenance and repair functions in another manner."

Q. HAS AT&T BROUGHT THIS ISSUE UP BEFORE?

A. Yes. BellSouth has repeatedly reminded AT&T that ECTA is built according to industry standards, which were required by AT&T's original Interconnection Agreement. If AT&T requires additional ECTA functionality, ECIC must develop the appropriate standard methodology prior to BellSouth's consideration.

BellSouth representatives have informed AT&T on numerous occasions that BellSouth could develop a non-industry standard integrated gateway interface that would provide the various data elements and processing

logic that would emulate TAFI functionality. Development of such a new non-industry standard machine-to-machine interface would require a BonaFide Request ("BFR") from AT&T and AT&T would have to pay for this development in advance. Submission of a BFR is the process used for providing customer products and/or services. The BFR process is outside the scope of the CCP. To date, BellSouth has not received a BFR from AT&T requesting this type of interface nor has AT&T introduced/negotiated this as part of its new Interconnection Agreement with BellSouth.

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Q. PLEASE SUMMARIZE YOUR CONCLUSIONS REGARDING ISSUE 19.

A. BellSouth provides appropriate non-discriminatory access to TAFI and ECTA and is not required to provide any additional functionality.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ron. M. Pate –Director – Interconnection Services, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 00-00079 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 97 pages and 27 exhibit(s).

Ron M. Pate

Sworn to and subscribed
before me on 12/20/00

NOTARY PUBLIC

SUZY A. SHERWOOD
MY COMMISSION EXPIRES
APR
28
2003
FULTON COUNTY, GEORGIA
NOTARY PUBLIC

Transmittal Cover Sheet for Pate Exhibit RMP-1

This sheet transmits the

Glossary of Terms

which consists of 3 pages.

Glossary of Terms

API - Application Programming Interface.

ATIS – Alliance for Telecommunications Industry Solutions.

BCCM – BellSouth Change Control Manager.

BFR – BonaFide Request.

BOC – Bell Operating Company.

CCCM – CLP's Change Control Manager.

CCP – Change Control Process.

CLP – Competing Local Provider.

CORBA – Common Object Request Broker Architecture.

CSOTS – CLEC Service Order Tracking System.

CSR – Customer Service Record.

DOE – Direct Order Entry.

EC-CPM – Exchange Carrier-Common Presentation Manager.

ECS – Electronic Communications Support group.

ECIC – Electronic Communications Implementation Committee.

ECTA - Electronic Communications Trouble Administration.

EDI – Electronic Data Interchange.

EICCP - Electronic Interface Change Control Process.

FCC – Federal Communication Commission.

FID – Field Identifier.

FUEL – FID USOC Editing Library.

GUI - Graphical User Interface.

ICS – Interconnection Services.

LAN – Local Area Network

LCSC – Local Carrier Service Center.

LENS – Local Exchange Navigation System.

LEO – Local Exchange Ordering system.

LESOG – Local Exchange Service Order Generator.

LPIC – Local Presubscribed Interexchange Carrier.

LSOG – Local Service Ordering Guidelines.

LNP – Local Number Portability.

LSR – Local Service Request.

OBF – Ordering and Billing Forum.

OCN – Operating Company Name.

OS/DA – Operator Service / Directory Assistance.

OSS – Operations Support Systems.

PF – Pending Facilities.

PIC – Presubscribed Interexchange Carrier.

PON – Purchase Order Number.

POTS – Plain Old Telephone Service.

RNS – Regional Negotiation System.

ROS – Regional Ordering System.

SOCS – Service Order Communications System.

SOER – Service Order Edit Routine.

SOLAR – Service Order Language Analysis Routine.

TAFI – Trouble Analysis and Facilitation Interface.

TAG – Telecommunications Access Gateway.

TCIF - Telecommunications Industry Forum.

UNE – Unbundled Network Element.

USOC – Universal Service Order Code.

WFA – Work Force Administration.

Transmittal Cover Sheet for Pate Exhibit RMP-2

This sheet transmits the

Draft Contract Language for 3 Options for OS/DA

which consists of 7 pages.

Proposed Contract Language addition for AT&T:

3.20 Procedures for Selective Carrier Routing.

3.20.1 In order for BellSouth to provide unbranded BellSouth Operator Services (Operator Assistance and Directory Assistance), two options may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; or (2) Selective Carrier Routing using a Line Class Code platform.

3.20.2 Selective Carrier Routing using a Line Class Code platform routes AT&T's end user traffic to a Trunk Group by uniquely identifying AT&T's end users in BellSouth's central office and routing those calls to an Unbranded (?) Trunk Group installed by BellSouth. (BellSouth shall program the Line Class Codes requested by AT&T in the central offices identified by AT&T. The Line Class Codes shall uniquely identify the call blocking restrictions and classes of service AT&T to offers its end users. In addition to the end user attributes that Line Class Codes identify, line class codes are used to further the BellSouth central office from which AT&T offers end users service. If AT&T utilizes NPAs or NXXs associated with other BellSouth rate centers to provide end user service from a particular central office, additional line class codes are required to appropriately identify and route AT&T's end users.

3.20.3 Line Class Codes are ordered through AT&T's Account Team. AT&T shall submit a written request identifying the BellSouth central offices where it would like to offer service; end user call blocking restrictions and classes of services to be offered by the CLEC; and a forecast of call volumes for each central office. BellSouth will verify the Line Class Code capacity for the central offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth Account Team will provide AT&T with a response regarding whether the Line Class Code request can be satisfied.

3.20.4 If line class code capacity exists within the central offices identified by the AT&T, the BellSouth Account Team will order the required Unbranded (?)Trunk Group for each TOPS Tandem. The interval for the provision of the trunk groups shall be approximately 45 calendar days from the receipt of the completed form for each TOPS Tandem, the number of trunk groups needed (based on forecast information from AT&T) may affect the timeframe. A separate trunk group is required for Operator Assistance and Directory Assistance. The trunk groups must be installed prior to the programming of the line class codes in each central office. The

Account Team must also submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The Account Team may need to request additional information from AT&T to complete these documents. Once the Line Class Code Administrator receives the completed forms, the Provisioning group will build the requested line class codes.

3.20.4 The line class codes may be built simultaneously with the installation of the Unbranded Trunk groups. Once the Unbranded trunk groups have been installed and the line class codes have been built, the Translations Group will translate the line class codes and point them to the appropriate trunk group for all central offices served by each TOPS Tandem. The process takes approximately 45 calendar days. Testing will be done once all of the Unbranded Trunk Group have been installed. The testing interval is approximately 15 days.

3.20.5 The rates for Line Class Codes are listed in Exhibit A of this Attachment. These charges are non-recurring costs to build and program the line class codes in the central office for each serving TOPS Tandem

3.20.6 Electronic ordering of Line Class Codes will be negotiated between the parties once the Line Class Codes are established.

Proposed Contract Language addition for AT&T:

3.21 Procedures for Selective Carrier Routing.

3.21.1 In order for BellSouth to provide Branded BellSouth Operator Services (Operator Assistance and Directory Assistance), two options may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; or (2) Selective Carrier Routing using a Line Class Code platform.

3.21.2 Selective Carrier Routing using a Line Class Code platform routes AT&T's end user traffic, where BellSouth is providing the local switching, to a Trunk Group by uniquely identifying such end users in BellSouth's central office and routing those calls to a Custom Branded Trunk Group. Custom Branding requires AT&T to order dedicated trunks from the desired BellSouth end office to the BellSouth TOPS tandem (switch). The AT&T end user will be routed to the Custom Branded Trunk Group based on the line class code for its end user that is currently handled by the Selective Carrier Routing using line class codes. BellSouth shall program the Line Class Codes requested by AT&T in the central offices identified by AT&T. The Line Class Codes shall uniquely identify the call blocking restrictions and classes of service AT&T offers its end users. In addition to the end user attributes that Line Class Codes identify, line class codes are used to further identify the BellSouth central office from which AT&T offers end users service. If AT&T utilizes NPAs or NXXs associated with other BellSouth rate centers to provide end user service from a particular central office, additional line class codes are required to appropriately identify and route AT&T's end users.

3.21.3 Line Class Codes are ordered through AT&T's Account Team. AT&T shall submit a written request identifying the BellSouth central offices where it would like to offer service; end user call blocking restrictions and classes of services to be offered by the CLEC; and a forecast of call volumes for each central office. BellSouth will verify the Line Class Code capacity for the central offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth Account Team will provide AT&T with a response regarding whether the Line Class Code request can be satisfied.

3.20.4 If line class code capacity exists within the central offices identified by the AT&T, AT&T will order the required dedicated trunks for the Custom Branded Trunk Group for each TOPS Tandem. A separate trunk group is required for Operator Assistance and

Directory Assistance. The trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team must also submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The AT&T Account Team may need to request additional information from AT&T to complete these documents. The interval for this process is 30 days for up to 20 line class codes per end office, and the Account Team working with AT&T to determine with AT&T how they want the end offices implemented. If there is more than one end office, there maybe be a Project Manager assigned to ensure timely and accurate implementation. Additionally, AT&T will also complete the CLEC Branding Questionnaire and shall fax the Questionnaire to the fax number identified on the questionnaire.

3.21.4 The rates for Line Class Codes are as set forth in Exhibit A of this Attachment. These charges include non-recurring charges to build and program the line class codes in each central office for each serving TOPS Tandem

3.21.5 Custom Branding for Directory Assistance is not available for certain classes of service, such as: Hotel/Motel, WATS, cellular type 1, and certain PBX sevices.

3.21.6 Electronic ordering of Line Class Codes will be negotiated between the parties once the Line Class Codes are established.

Proposed Contract Language addition for AT&T:

3.20 Procedures for Selective Carrier Routing.

3.20.1 In order for BellSouth to provide branded or unbranded BellSouth Operator Services (Operator Assistance and Directory Assistance), two options may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; or (2) Selective Carrier Routing using a Line Class Code platform. Custom Branding for Directory Assistance is not available for certain classes of service, such as: Hotel/Motel, WATS, cellular type 1, and certain PBX services.

3.20.2 Where BellSouth is providing branded BellSouth Operator Services through selective carrier routing using a line class code platform and where BellSouth is providing the local switching, AT&T's end user traffic is routed to a dedicated trunk group by uniquely identifying by line class codes such end users in BellSouth's central office. AT&T shall order the dedicated trunks from the desired BellSouth end office to the BellSouth TOPS tandem (switch).

3.20.2 Where BellSouth is providing unbranded BellSouth Operator Services through selective carrier routing using a line class code platform, AT&T's end user traffic is routed to a trunk group installed by BellSouth.

3.20.3 Where AT&T is utilizing an Alternative Operator Services Provider through selective carrier routing using a line class code platform and where BellSouth is providing the local switching, AT&T's end user traffic is routed to a dedicated trunk group, which will be provisioned in accordance with BellSouth's and the Alternate Operator Service Provider's requirements, from the desired BellSouth End Offices to the Alternative Operator Services Point of Interface.

3.20.4 BellSouth shall program the Line Class Codes requested by AT&T in the central offices identified by AT&T. The line class codes shall uniquely identify each set of the call blocking restrictions and each class of service AT&T offers its end users. In addition to the end user attributes that line class codes identify, line class codes are used to further identify the BellSouth central office from which AT&T offers end users service. As such, if AT&T utilizes NPAs or NXXs associated with other BellSouth rate centers to provide end user service from a particular central office, additional line class codes are required to appropriately identify and route AT&T's end users.

3.20.5 Line Class Codes shall be ordered through AT&T's Account Team. AT&T shall submit a written request identifying the BellSouth central offices where it would like to offer end user service; each set of end user call blocking restrictions and each class of service to be offered by AT&T; and a forecast of call volumes for each central office. BellSouth will verify the Line Class Code capacity for the

central offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth Account Team will provide AT&T with a response regarding whether the Line Class Code request can be satisfied.

3.20.6 If line class code capacity exists within the central offices identified by the AT&T, and AT&T has requested branded BellSouth Operator Services, AT&T will order the required dedicated trunks from the desired BellSouth end office to the BellSouth TOPs Tandem. A separate trunk group is required for Operator Assistance and Directory Assistance. The trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The AT&T Account Team may need additional information from AT&T to complete these documents and AT&T shall provide such information in a timely manner. The interval for this process is 30 days for up to 20 line class codes per end office, and the Account Team work shall work with AT&T to determine in what order AT&T wants the end offices implemented. If there is more than one end office, there may be a Project Manager assigned to ensure timely and accurate implementation. Additionally, AT&T shall also complete the CLEC Branding Questionnaire and shall fax the Questionnaire to the fax number identified on the questionnaire.

3.20.7 If line class code capacity exists within the central offices identified by AT&T, BellSouth shall order the trunk groups utilized to carry the unbranded Operator Services traffic to each TOPs tandem. The interval for the installation of the trunk groups shall be approximately 45 calendar days from the receipt of the completed form for each TOPs tandem. The number of trunk groups required which shall be based upon a forecast of traffic volume received from AT&T may affect the provisioning interval and, if so, AT&T shall be notified. A separate trunk group shall be required for Operator Assistance and for Directory Assistance. Trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall also submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The Account Team may need additional information from AT&T to complete these documents and AT&T shall provide said information in a timely manner.

3.20.8 If line class code capacity exist within the central offices identified by AT&T, and AT&T has selected an Alternate Operator Services Provider, AT&T shall order the required dedicated Trunks from the desired BellSouth end offices to the Alternative Operator Services Provider Point of Interface. The trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator.

3.20.8 Where BellSouth is providing Unbranded Operator Services, the line class codes may be built simultaneously with the installation of the trunk groups. Once the trunk groups are installed and the line class codes built, BellSouth Translations will translate the line class codes and point said codes to the appropriate trunk groups. The process shall take approximately 45 calendar days. Testing shall be conducted after all work activities have been completed and shall take approximately 15 calendar days.

3.20.9 Where AT&T is using an Alternative Operator Services Provider, AT&T, at its option, order dedicated trunks between its Alternative Operator Services Provider's Point of Interface and the BellSouth Operator Services Platform. If AT&T elects to install said dedicated trunks, AT&T's Operators may provide verify busy line or line interruption services on numbers located in the BellSouth Switch at the rates set forth in Exhibit C.

3.20.9 The rates for Line Class Codes are set forth in Exhibit Cof this Attachment. These charges include non-recurring charges to build and program the line class codes in each central office for each serving TOPs Tandem.

3.20.10Electronic ordering of Line Class Codes will be negotiated between the parties once the Line Class Codes are established.

Transmittal Cover Sheet for Pate Exhibit RMP-3

This sheet transmits the

AT&T-Specific OS/DA User Requirements

which consists of 16 pages.

BELLSOUTH

encDocUserReq
ENC8850.DOC
CMVC Version 1.2

ENCORE USER

REQUIREMENTS

GENERATE SPECIFIED LCC IF MAN/AECN PRESENT AND OCN EQUALS AT&T

FINAL
ENC8850.DOC
DOCUMENT VERSION 4.0
NOVEMBER 16, 2000

Created: 04/28/2000
Revised: 11/16/2000

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1. ADMINISTRATIVE INFORMATION

1.1. Originator/Requester/Release

Originator's Name/Group: Maggie Smith /OSP&M	Requirement Writer assigned: Jane Scott	Date assigned: 04/03/2000
Requester Name: Linda Tate	Requester Department: NS-CS	Requester Contact #: 404 927-7878
Approved for Release : 8.0		

1.2. Administrative/Contact Information

Contact Name	Department	Title	Contact Number
Jane Scott	NS	Requirements Writer	205 977-0331
Karen Lewis	NS-CS	Requirements Manager	404 927-7493
Judy Jones	IT-LESOG	Functional Analyst	205 977-0774

2. SCOPE

User Requirement Source (check all that apply)	PSC Mandate		CLEC Request	X
	Regulatory		Increase Productivity/Flow-through	
	Other (Specify)		System Stability and Performance	

The scope of this document is for the Service Order Generator to generate a specified Line Class Code (LCC) for service orders for AT&T only in the ATLNGAPP34A CLLI code and only for NPA 404 (not for NPA 678). This feature shall be applicable to REQTYP M. The Activity types involved are N, V, P, Q, and Activity C when adding a line and/or a CREX4 to an existing account. The chart for the specific Line Class Codes is included in both the Standards/References/Related Requests section and in the User Requirements. The intent of this document is to deliver Unbranded Directory Assistance UNE to AT&T.

2.1. Scope Signoff

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Name	Title/Department	Date

3. STANDARDS / REFERENCES / RELATED REQUESTS

Title of Document/Source	Version or Issue #	Issue Date

List related work requests (parent/child) in this table.

CMVC #	Title (abstract) of CMVC Work Request
8850	Generate Specified LCC if MAN/AECN present; OCN=AT&T
12073	Modify BL ENC8850 to Change Acceptance Criteria
12179	Add Requirement to Replace BSBD and BSBOL

LCC to be added by Service Order	OPTION	HUNT? (Y/N)	DESCRIPTION (CREX+ code on

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Generator			account specified by CLEC)
ATU	Unrestricted	N	None
AT4	4	N	CREX4
ARU	Unrestricted	Y	None
AR4	4	Y	CREX4

CDIA

Contents of the LCSC Collection

Search for CREX+ produced 6 hits.

2 UNE - ULS Port and Port / Loop Combo

2 CLEC Payphone Access Line Provisioning

1 ISDN-PRI / UNE Combination

1 LNP to Resale Migrations for Non-Complex Orders

ORBIT

Customized Code Restriction (CCR) is a service that provides a customer with options for restricting billable outgoing calls. It is a service that is available to basic exchange customers with individual line Residence and Business service, including Foreign Exchange, Foreign Central Office, Feature Group A (FGA) service, or PBX trunks.

Customers who have CCR and make outgoing calls to numbers disallowed by the CCR dialing plan will be routed to an appropriate fixed recorded announcement which says "I'm sorry, your call cannot be completed as dialed."

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4. CHANGE HISTORY

Document Version	Date Issued	Change	Author
0.1	04/28/00	Original Draft	Jane Scott
0.2	05/04/00	Add to Scope the REQTYPs and Activity types applicable. Add information retrieved from CDIA and ORBIT which explains on which services CREX+ is valid. Add REQTYPs and Activity types to UR8850.0001	Jane Scott/Karen Lewis
0.3	05/09/00	Add IBIR information in UR8850.0060 and UR8850.0070. Add acceptance criteria from Requirements Manager. Remove references to REQTYP B & C in scope and requirements.	Jane Scott/Karen Lewis
0.4	05/09/0	Add acceptance criteria to cover IBIR billing.	Jane Scott/Karen Lewis
0.5	05/11/00	Add 3 requirements per SME, UR8850.0080 and .0090 and .0011. Change wording on .0010. Add all REQTYPs to .0060 and .0070.	Jane Scott/Karen Lewis
0.6	09/18/00	Revise entire document due to customer change to unbranded directory assistance. Change Scope as shown. Change assumption 5.1 to TCIF 9 only. Change LESOG FA to Judy Jones. Chg .0001 to show REQTYPs E & M, change acttyps to remove acttyp A for TCIF 7. Remove reference to CREX2, 3 and 6. Add .0002 to show for ATLNGAPP334 wire center only, and NPA 404 only with 17 NXX's. Change .0011 chg CREX+ to CREX4. Remove .0020, .0040 and .0050 with this version no longer applicable to feature. Change .0060 to format the FID and data to IBIR UNBD for unbranded DA , and remove reqtyps E & F. On .0070 remove REQTYP F, change CLBOL to UNBOL Unbranded Operator call handling with LIDB. Remove .0080 and .0090.	Jane Scott/Karen Lewis
0.7	09/27/00	Revise Scope to remove REQTYP E, and remove ACTTYP T. Added applicable to TCIF 9 only in requirement .0001	Jane Scott/Karen Lewis
0.8	10/05/00	On .0011 add to requirement 'as ordered on the LSR'.	Judy Jones/Jane Scott
0.9	10/31/00	On .0001 add LNA N for C activity adding a line.	Judy Jones/Jane Scott
1.0	10/31/00	Final Document. Add last sentence: "These requirements are applicable only for AT&T CC 7680" to requirement UR8850.0001. Remove ACT Q per Karen from scope and requirement .0001 Add all new acceptance criteria.	Jane Scott/Karen Lewis/Judy Jones
2.0	11/09/00	Final Document. Replace RESH with MAN per SME. Change CC in Acceptance criteria to 7680. See CMVC12073 to modify.	Jane Scott/Karen Lewis
3.0	11/14/00	Final Document Remove ACTTYP W and add ACTTYP Q to scope and UR8850.0001 Changes handled by remarks entry to CMVC item 12073. 9.5 acceptance criteria change ATU to AT4.	Jane Scott/Karen Lewis
4.0	11/16/00	Incorporate CMVC12179 issued 11/14 into this document requirements .0060 and .0070. Final Document.	Jane Scott

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5. ASSUMPTIONS

Number	Description
5.1	Changes for this Item 8850 will be incorporated into TCIF 9.

6. ISSUES

Issue #	Issue Description and Resolution	Issue Owner	Date Opened	Date Closed
N/A				

7. RISKS

N/A.

8. USER REQUIREMENTS

UR8850.0001	The Service Order Generator shall add to the Category D USOC on **inward line** activity, a Line Class Code (FID LCC) if the LSR has **NO** CREX+ USOC blocking code, or if the LSR **HAS** a CREX4 USOC (feature added). This shall be applicable to REQTYP M. This shall be applicable to Activity types N, V, P, Q, and Activity type C when adding a line (LNA = N) and/or a CREX4 to an existing account. These requirements are applicable to TCIF 9 only. These requirements are only applicable to AT&T CC **7680.**
UR8850.0002	The Service Order Generator shall add the Line Class Code (FID LCC) only in the ATLNGAPP34A wire center for NPA 404 only (Not 678) for the following NXX's: 249, 251, 347, 498, 532, 541, 619, 685, 686, 712, 745, 810, 815, 817, 829, 853, 910.
UR8850.0010	The Service Order Generator shall **add** the Line Class Code (LCC) according to the chart below if the CLEC **does not request** the CREX4 feature, based on whether he has ordered hunting.
UR8850.0011	The Service Order Generator shall **replace** the CREX4 feature as ordered on the

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	LSR with the line class code according to the chart below, based on the CLEC ordering CREX4 and according to whether the CLEC requests hunting.
UR8850.0020	Removed with version 0.6.
UR8850.0030	The Service Order Generator shall format the LCC Code according the following example: I1 1FB /TN 404 251-0000/LCC ATU The FID LCC (Line Class Code) is floated behind the Category D USOC.
UR8850.0040	Removed with version 0.6
UR8850.0050	Removed with version 0.6
UR8850.0060	The Service Order Generator shall format the FID and data IBIR UNBD (Unbranded Directory Assistance UNE) to REQTYP M Service Orders to which it adds the Line Class Code. This FID and data will be placed in the BILL Section. The Service Order Generator shall **not** format the IBIR BSBD on orders that are applicable to this requirement.
UR8850.0070	The Service Order Generator shall **also** format the FID and data IBIR UNBOL (Unbranded Operator Call Handling with LIDB) on REQTYP M Service Orders to which it adds the Line Class Code. The Service Order Generator shall **not** generate the IBIR BSBOL for the service orders that this requirement addresses. This FID and data (IBIR UNBOL) will be placed in the BILL Section. In the Bill Section, both BIR FIDs shall appear: **EXAMPLE:** **---Bill** **IBIR UNBOL** **IBIR UNBD** These two IBIR FIDs with data (UNBD and UNBOL for unbranded operator call handling and unbranded directory assistance) will be generated **in place of** the IBIR BSBD and the IBIR BSBOL normally generated on REQTYP M orders, for CC 7680 only and for the ATLNGAPP34A CLLI only.
UR8850.0080	Removed with version 0.6.
UR8850.0090	Removed with version 0.6
UR8850.0100	The Service Order Generator shall not change the embedded base line USOCs and CREX4 USOCs using C & T action codes. Only LSRs ordering lines, with or without CREX4 or LSRs adding CREX4 to an existing line shall be applicable to this feature.

LCC to be added by Service Order Generator	OPTION	HUNT? (Y/N)	DESCRIPTION (CREX+ code on account specified by

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			CLEC)
ATU	Unrestricted	N	None
AT4	4	N	CREX4
ARU	Unrestricted	Y	None
AR4	4	Y	CREX4

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9. ACCEPTANCE CRITERIA

Common Criteria:

1. State of Georgia only unless otherwise stated
2. This Criteria applies to Issue 9
3. On all inward activity of CREX4 the system should remove the CREX4 and replace with the appropriate LCC from the table on page 3.

Criteria #	Acceptance Criteria Description	Requirement #
9.1	Issue an LSR in GA for : REQTYP: M Act Type: N MAN/CC: 7680 TOS: Bus Multi Line , with hunting Address to use: 65 10th St NE, Atlanta Ga 30309 Expected Results: Order should issue error free and populate the LCC of ARU to the Category D USOC (line class of service)after the TN as follows: I1 XXX/TN XXX-XXX-XXXX/LCC ARU The Assigned TN should be 404 with NXX one of the following: 249,251,347,498,532,541,619,685,686,712,745,810,815,817,829,853, 910.	UR8850.0001 UR8850.0010 UR8850.0011 UR8850.0030 UR8850.0060 UR8850.0070 UR8850.0100
9.2	Issue an LSR in GA for : REQTYP: M Act Type: V MAN/CC: 7680 Use on an account that has CLLI of ATLNGAPP34A TOS: Bus Multi Line w/ hunting Add CREX4 Expected Results: Order should issue error free and populate the LCC of AR4 to the Category D USOC (line class of service)after the TN as follows: I1 XXX/TN XXX-XXX-XXXX/LCC AR4	UR8850.0001 UR8850.0010 UR8850.0011 UR8850.0030 UR8850.0060 UR8850.0070 UR8850.0100

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	The Assigned TN should be 404 with NXX one of the following: 249,251,347,498,532,541,619,685,686,712,745,810,815,817,829,853, 910.	
9.3		
9.4	Issue an LSR in any state other than GA for : REQTYP: M Act Type: New Install MAN/CC: 7680 TOS: Bus Multi Line Add CREX3 Expected Results: Order should issue error free and populate the CREX3. It should not populate any other line class code.	UR8850.0001 UR8850.0010 UR8850.0011 UR8850.0030 UR8850.0060 UR8850.0070 UR8850.0100
9.5	Issue an LSR in GA for : REQTYP: M Act Type: P MAN/CC: 7680 Use on an account that has CLLI of ATLNGAPP34A TOS: Res Multi line no hunting CSR: CREX4 Expected Results: Order should issue error free and populate the LCC of AT4 to the Category D USOC (line class of service)after the TN as follows: I1 XXX/TN XXX-XXX-XXXX/LCC AT4	UR8850.0001 UR8850.0010 UR8850.0011 UR8850.0030 UR8850.0060 UR8850.0070 UR8850.0100
9.6	Issue an LSR in GA for : REQTYP: M Act Type: N MAN/CC: 7680 TOS: Bus Single line Add: CREX4 Use Addresss: 70 Courtland ST NE, Atlanta 30303 Expected Results: Order should issue error free and populate without a LCC	UR8850.0001 UR8850.0010 UR8850.0011 UR8850.0030 UR8850.0060 UR8850.0070 UR8850.0100
9.7	Issue an LSR in GA for : REQTYP: M	UR8850.0001 UR8850.0010

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	Act Type: Q MAN/CC: 7680 Use on an account that has CLLI of ATLNGAPP34A TOS: Res Multi line no hunting CSR: CREX4 Expected Results: Order should issue error free and populate the LCC of ATU to the Category D USOC (line class of service)after the TN as follows: I1 XXX/TN XXX-XXX-XXXX/LCC ATU	UR8850.0011 UR8850.0030 UR8850.0060 UR8850.0070 UR8850.0100
9.8	Issue an LSR in GA for : REQTYP: M Act Type: V MAN/CC: 7680 Use on an account that has CLLI of ATLNGAPP34A TOS: Bus Single Line account with CREX+ USOC Add: additional line with with CREX4 Expected Results: Order should issue error free and populate the LCC of ATU to the Category D USOC (line class of service)after the new additional line as follows REPLACING THE CREX4: I1 XXX/TN XXX-XXX-XXXX/LCC ATU. The Existing line with CREX+ USOC should not change.	UR8850.0001 UR8850.0010 UR8850.0011 UR8850.0030 UR8850.0060 UR8850.0070 UR8850.0100
9.9	Issue an LSR in GA for : REQTYP: M Act Type: C LNA: N (add an additional line) MAN/CC: 7680 Use on an account that has CLLI of ATLNGAPP34A TOS: Bus Multi Line w/ hunting Add CREX4 Expected Results: Order should issue error free and populate the LCC of AR4 to the Category D USOC (line class of service)after the TN as follows: I1 XXX/TN XXX-XXX-XXXX/LCC AR4	UR8850.0001 UR8850.0010 UR8850.0011 UR8850.0030 UR8850.0060 UR8850.0070 UR8850.0100

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10. LOCAL EXCHANGE ORDERING IMPLEMENTATION GUIDE

FIELD NAME	REQTYP	ACT TYPE	NEW USAGE	ADDITIONAL CHANGES	LNA	NEW USAGE
N/A						

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11. REQUIREMENTS CHECKLIST

Number	Requirement Checklist	Yes	No	N/A
11.1	Have all participants, IT-FA, NCS-CS, NCS-ITS and others, if appropriate, signed off on the *scope* (2.1.) of the change request?	☒	☐	☐
11.2	Have the standards, these requirements are based on, been listed in the Standards / References section?	☒	☐	☐
11.3	Have all changes been documented in the Change History?	☒	☐	☐
11.4	Have all Assumptions and Risks been identified and documented?	☒	☐	☐
11.5	Have all *issues* between the participants been managed to a satisfactory conclusion?	☒	☐	☐
11.6	Have the *requirements* been explicitly documented and understood by ALL participants: i.e., NCS-CS, NCS-ITS, IT: Requirements and Development?	☒	☐	☐
11.7	Has each requirement, identified in the Scope section, been addressed and developed?	☒	☐	☐
11.8	Has each requirement been assigned a *unique number,* for traceability?	☒	☐	☐
11.9	Have the *business rules* been incorporated into the editing process, where applicable?	☒	☐	☐
11.10	Are all "notes", in the requirements, informational only?	☐	☐	☒
11.11	Has the Implementation Guide Matrix been reviewed and completed?	☐	☐	☒
11.12	Have the relevant *acceptance criteria* been defined and documented?	☒	☐	☐
11.13	Have the requirements been accepted and approved by all participants?	☒	☐	☐

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11.14	Has Testing (the testers) reviewed the document?	☐	☐	☒
11.15	Is the Error Messages Verbiage clear and concise?	☐	☐	☒
11.16	Have all sections of this document been reviewed for completeness and accuracy?	☒	☐	☐

12. GLOSSARY *(REQUIRED)*

Name	Description
ITS	Information Technology Services
NS – CS	Network Services – Customer Service
LCSC	Local Customer Service Center
LESOG	Local Exchange Service Order Generator
LSR	Local Service Request
OSP&M	Operations Systems Planning & Management

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SIGNOFF AGREEMENT

CHANGE REQUEST ENC8850.DOC

Generate Specified LCC if MAN/AECN present and OCN=AT&T

We, the undersigned, agree that the following BellSouth Telecommunications document is complete and acceptable to all:

NAME	TITLE / DEPARTMENT/ GROUP	DATE

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Transmittal Cover Sheet for Pate Exhibit RMP-4

This sheet transmits the

Carrier Notification Letter SN91082004

which consists of 2 pages.

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91082004

Date: November 22, 2000

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECs - **REVISED** – Electronic Interface Release 8.0 and Associated Downtime (Originally released October 17, 2000)

This is to advise that Release 8.0 of the electronic interface systems was implemented on November 18, 2000. However, due to technical difficulties, some features have been deferred to a future release. The scope of the features released on November 18, 2000, and the deferred features are detailed below:

The scope of the features released on November 18, 2000

ALL Users:

- The non-resale Uniform Service Order Codes (USOCs) EMP1S and EMP1X (Equipment Maintenance Plan and associated credit) will automatically be stripped on REQTYP E and M, ACT of V, W, Q, and P.
- A production defect affecting REQTYP JB, ACTTYP A Local Service Requests (LSRs) has been corrected.
- A production defect causing auto-clarification messages on conversion from Port/Loop combinations to Resale Flat-Rate Business Line has been corrected.

LENS Users:

- Ability to submit Loop Makeup Queries from Local Exchange Navigation System (LENS) Inquiry Screen as previously implemented in 7.0 beta test environment will now be made available in production.

TAG Users:

- Ability to submit Loop Makeup Queries as previously implemented in 7.0 beta test environment will now be available for TAG in product.

The ability to control branding on Operator Assistance and Directory Assistance using specific Line Class Codes (LCC) was implemented for AT&T in Georgia. Other CLECs interested in this capability should contact their account team representative.

Due to technical difficulties, the following features have been deferred to a future Electronic Interface Release 8.0.1.

LENS Users:

- Features/Services section of Line Details screen will be updated to say "Number of Features to Add/Change/Delete", versus "Number of Features to Add."
- Implement ability to change Class of Service on REQTYP E change activity (ACT C) orders. (This does not allow users the ability to change from Business to Residence, or vice versa.)

TAG Users:

- TAG Release 7.5 will be implemented. This will be a server and Application Program Interface (API) change.
- Direct Inward Dial (DID) functionality (REQTYP N) will be implemented.

Should you have any questions, please contact your BellSouth account team representative.

Sincerely,

ORIGINAL SIGNED BY JIM BRINKLEY

Jim Brinkley – Senior Director
BellSouth Interconnection Services

Transmittal Cover Sheet for Pate Exhibit RMP-5

This sheet transmits the

BellSouth Change Control Process Guide, Version 2.0

which consists of 99 pages.

BELLSOUTH

CHANGE CONTROL PROCESS

CCP8_23.DOC

VERSION 2.0

AUGUST 23, 2000

Issued: 8/23/00

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

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

This document is not to be construed as a suggestion to any manufacturer to modify or change any of its products, nor does this document represent any commitment by BellSouth Telecommunications to purchase any product whether or not it provides the described characteristics.

This document is not to be construed as a contract. It does not create an obligation on the part of BellSouth Telecommunications or the Competitive Local Exchange Carriers to perform any modification, change or enhancement of any product or service.

Nothing contained herein shall be construed as conferring by implication, estoppel or otherwise, any license or right under any patent, whether or not the use of any information herein necessarily employs an invention of any existing or later issued patent.

VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1 Section 8 Section 11	- Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1 Section 2	- Added "testing" under process changes - Clarification provided in "Change Review Participants" description

			Participants" description.
		Section 4	- Added statement regarding submittal of Change Requests
		Part 2	- Clarification provided for documentation changes for business rules
			- Step 2-Added email notification
			- Step 3-Removed "Cancellation by BellSouth"
			- Step 3-Clarification on reject reasons
		Section 5	- Step 3-Clarification on internal validation activities
			- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround
			- Added defect implementation range
		Section 6	- Changed prioritization from "by interface" to "by category"
			- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days
			- Modified the prioritization voting rules
		Section 7	- Updates to the Introduction and Retirement of Interfaces
		Section 8	- Added Type 6 escalation turnaround time
			- Changed 3rd Level Escalation contacts for Types 2-6
		Section 11	- Removed "Cancellation by BellSouth" and "Defect Cancelled" definitions
		Appendix A	- Removed "Cancellation by BellSouth" from Change Request Form and Checklist
			- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.
		Appendix D	- Added BellSouth Versioning Policy

		All	Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover	- Removed "Interim" from cover.
		Section 3	- Updated Type 6 definition to incorporate new defect and expedited feature definitions.
		Section 5	- Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort.
		Section 10	- Added Internet Web sites for EDI and TAG Testing Guidelines
		Section 11-Terms & Definitions	- Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts.
		Appendix A	- Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels.
		All	- Referenced the handling of expedites and expedite notification where appropriate.

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SEE ATTACHED DOCUMENTS 53

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance)
- Defects/Expedites

The scope of the Change Control Process **does not** include the following:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- Testing Support (i.e. negotiating/coordinating test agreements and dates)
- Issue Resolution/Questions (i.e. questions associated with interface functionality, interpreting documentation)

Change Requests of this nature will be handled through existing BellSouth processes.

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/
Select "Local Exchange Carriers"
Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes).

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes).

Type 6- CLEC Impacting Defects/Expedites.

Any non-Type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BellSouth has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects/expedites will be handled through the Change Control Process.

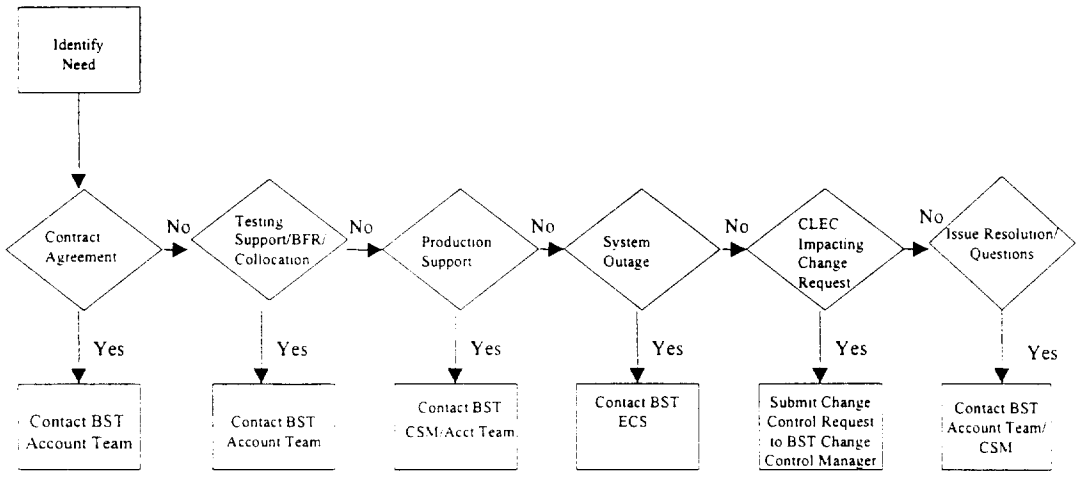


Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following two sub-sections describe the process flows for typical Type 1 through Type 5 changes. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

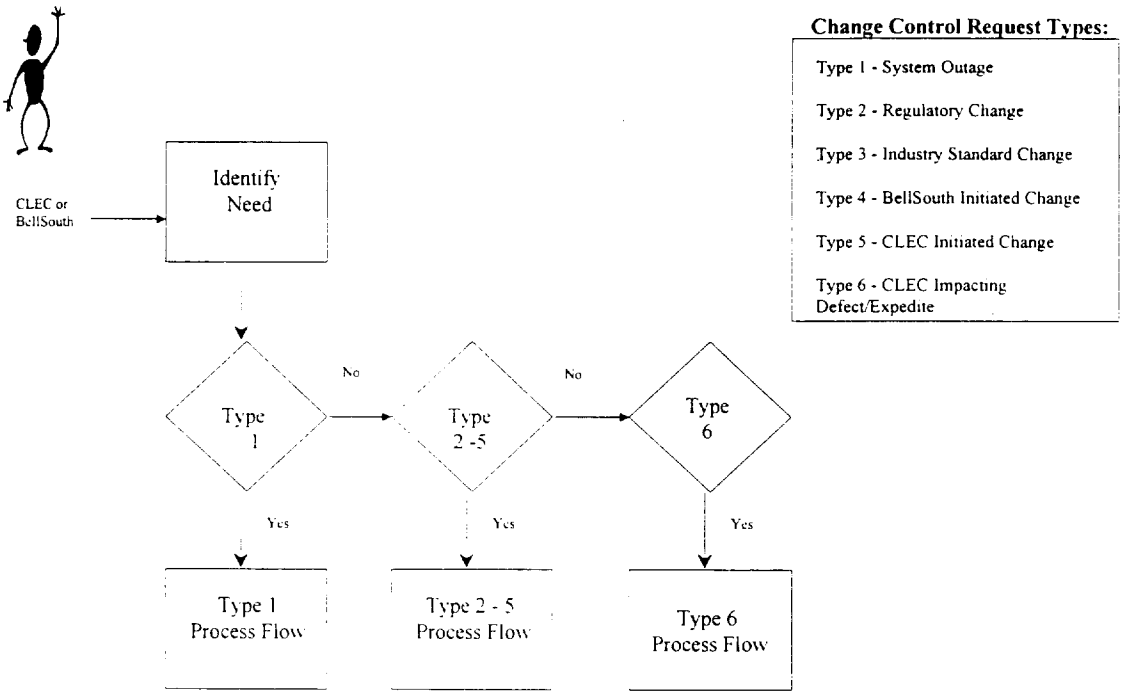


Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

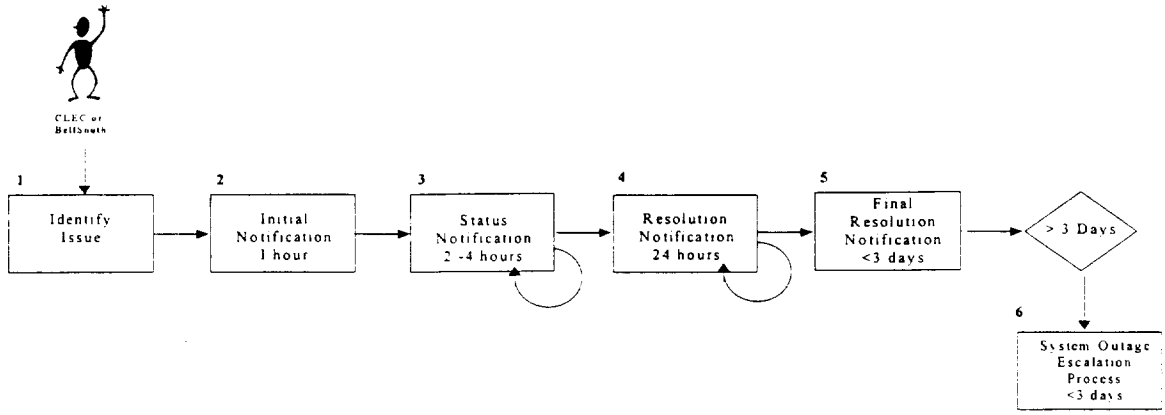


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	IDENTIFY ISSUE: 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will record and track the outage.	INPUTS: • Issue Characteristics • Call to ECS Helpdesk OUTPUTS: • Recorded Outage	N/A
2	ECS	INITIAL NOTIFICATION: 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis. 3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended.	INPUTS: • Recorded Outage OUTPUTS: • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and posted to the web.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Outage Information will be reported in the monthly status meeting by the BCCM.		
3	ECS	**STATUS NOTIFICATION:** **(ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	ECS CCCM	**RESOLUTION NOTIFICATION:** **(ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect/expedite, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage
5		**FINAL RESOLUTION NOTIFICATION:** 1. The final resolution notification is	**INPUTS:** • Final Resolution Information	< 3 days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
	ECS	posted on the Web.	**OUTPUTS:** • Final Resolution Notification	
6	CCCM ECS	**ESCALATION** 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	**INPUTS:** • Information or concern relating to a Type 1 - Systems Outage **OUTPUTS:** • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

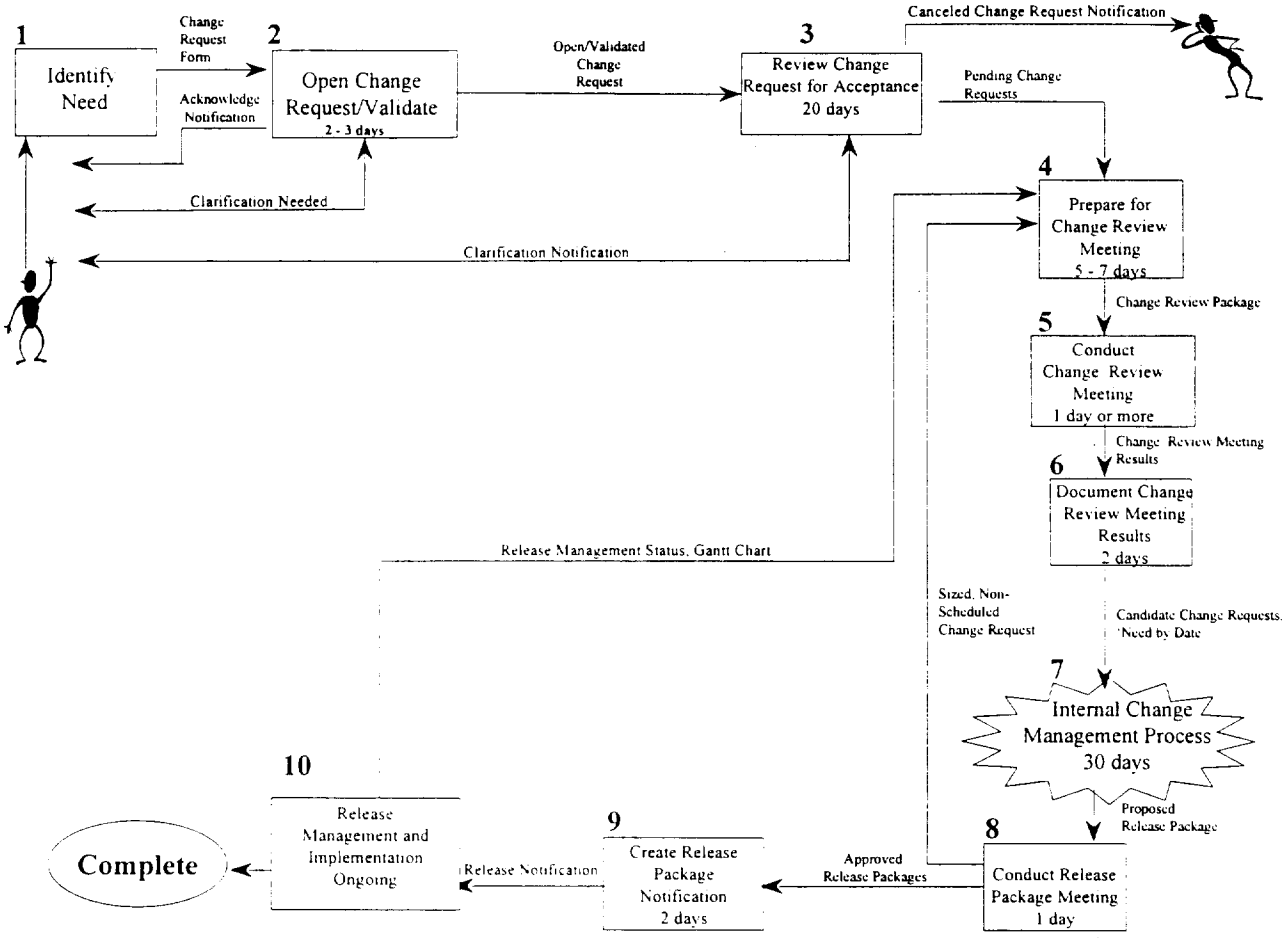


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- Software Release Notifications will be provided 30 days or more in advance of the implementation date.
- Documentation changes for business rules will be provided 30 days or more in advance of implementation date.
- CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request)	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	**OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or training issue forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. **NOTE**: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. 4. BST may reject the change request	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		based on the following reasons: cost, industry direction or technically not feasible to implement and will provide notification to the originating party. Prior to rejecting a request, all options for accommodating the request will be exhausted. The rejection reason will be shared with the CLECs for input. **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	BCCM CCCM	**PREPARE FOR CHANGE REVIEW MEETING** NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. **BCCM** 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. **CCCM** 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting.	**INPUTS:** • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log **OUTPUTS:** • Change Request Log • CLEC Draft Priority List	5-7 Bus Days
5	BCCM CCCM	**CONDUCT CHANGE REVIEW MEETING** **Monthly Status Meetings**	**INPUTS:** • Change Request Log • CLEC Draft Priority List • Desired/Want Dates	1 Bus Day (or as needed based on volume)

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects/expedites) at monthly status meeting. 3. Review current Release Management statuses. **Prioritization Meetings (held as needed based on published release schedule)** 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. Discuss Impacts. 4. Prioritize Change Requests. 5. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. 6. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 7. Review issues and action items and assign owners.	• Impact analysis **OUTPUTS:** • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items (if required)	Meeting Day
6	BCCM	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities only to the Candidate Change Requests that meet the criteria established by the Internal Change Management Process. This ensures that participating parties are	**INPUTS:** • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log **OUTPUTS:** • BellSouth's Proposed Release Package	30 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		reviewing capacity and impacts to schedules before assigning resources to activities.	Release Package	
8	BCCM CCCM	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process. 5. Based on BST/CLEC consensus create Approved Release Package. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting. 8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".	**INPUTS:** • BellSouth's Proposed Release Package • BellSouth's Release Schedule • Change Request Log **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • Non-Scheduled Change Requests (Return to Step 4) • Date for initial Release Management Project Meeting	1 Bus Day
9	BCCM	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. 4. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Implemented Change Request	Ongoing

5.0 DEFECT/EXPEDITE NOTIFICATION PROCESS

A CLEC/BST identified defect/expedite will enter this process through the Change Management Team as a Type 6 Change Request. If the defect/expedite is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

CLEC Notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

A **defect** is any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

An **expedited feature** is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.

Type 6 Change Requests will have three Impact Levels:

- **High Impact**

  The failure causes impairment of critical system functions and no electronic workaround solution exists.

  Expedited features will be treated as High Impact.

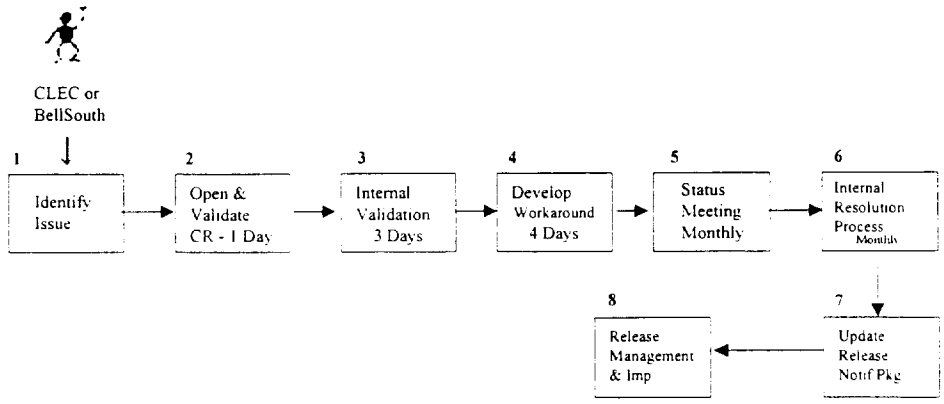
- **Medium Impact**

  The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

  The failure causes inconvenience or annoyance.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect/Expedite.



Note: Step 4 (Develop Workaround) does not apply for High Impact Expedites.

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects/expedites, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Identify Defect/Expedite. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments should include the following: • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 6 Change Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE DEFECT/EXPEDITE FORM FOR COMPLETENESS** 1. Log Defect/Expedite in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect/Expedite). 4. BCCM reviews change request for	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:** • New Defect/Expedite • Acknowledgment Notification • Clarification Notification (if required)	1 Bus Day

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		mandatory fields using the Change Request Form Checklist. 5. Verify specifications and related information exists. 6. Send Clarification Notification via email to the originator if needed. 7. Update CR Status to' PC' for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.		
3	BCCM	**INTERNAL VALIDATION** 1. Validate that it is a defect/expedite. 2. Perform internal defect/expedite analysis. 3. Determine status of request: • If change already exists or training issue forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect/Expedite and indicate appropriate Impact Level. **Note**: High Impact Expedites will skip Step 4 (Develop Workaround) and be scheduled for the current, next release, or point release, best effort. • If the process is operating as specified in the baselined requirements and published business rules, the BCCM	**INPUTS:** • New Defect/Expedite **OUTPUTS:** • Validated Defect/Expedite • Defect/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	3 Bus Days

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		will communicate the results via e-mail to the originator to discuss/determine the next step(s). • If issue is re-classified as a standard feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect/expedite process flow and enter Types 2-5 process flow (enter at Step 3). **NOTE**: See Section 9.0 Terms and Definitions – Defect/Expedite Status for valid status codes and descriptions. Defect/Expedite notification will be provided to CLEC community via e-mail and web posting.		
4	BCCM	**DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)** 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC. 4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. Defect workaround notification will be provided to CLEC community via e-mail and web posting. If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.	**INPUTS:** • Validated Defect • Clarification Notification (if required) **OUTPUTS:** • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • E-mail and web posting of workaround	4 Bus Days
5	BCCM	**MONTHLY STATUS MEETING** 1. Provide status of Defect/Expedite. 2. Solicit CLEC/ BST input. 3. Update Defect/Expedite information as needed.	**INPUTS:** • Defects/Expedites Received • Change Request Log • Defect/Expedite Analysis • Workaround (if applicable)	Monthly or when status changes, whichever occurs first.

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
			OUTPUTS: • Updated status • Updated Change Request Log • Meeting minutes	
6	BCCM	**INTERNAL RESOLUTION PROCESS** 1. Schedule and evaluate Defects/Expedites based on capacity and business impacts. 2. Provide status updates to the CLEC community via email as the status changes until the defect/expedite is scheduled. **NOTE**: Validated defects (High Impact) will be implemented within a 4 – 25 business day range, best effort. Expedites (High Impact) will be implemented in the current, next release, or point release, best effort.	**INPUTS:** • CLEC/ BST input **OUTPUTS:** • Defect/Expedites Release Schedule	Monthly or when status changes, whichever occurs first.
7	BCCM	**UPDATE RELEASE PACKAGE NOTIFICATION** 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". **Note**: The release notification will be published in a timely manner, based on the release constraints associated with the defect/expedite.	**INPUTS:** • Defect/Expedite Feature Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for defects/expedites (may be less than 30 days).
8	BCCM	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 6 changes: 1. Lead project manager communicates	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status	Ongoing

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		release management project status to BCCM for inclusion in Monthly status meetings. 2. BellSouth business requirements will be presented to CLECs for expedited features (if applicable). If needed, changes will be incorporated and requirements re-baselined. 3. Once a defect/expedite is implemented in a release, the status will be changed to "I" for Change Implemented.	• Implementation Date • Implemented Change Request	

6.0 CHANGE REVIEW

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be scheduled to coincide with the published release schedules. For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to coincide with the published release schedules and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish "desired/want" dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and documentation will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30 – 45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC Community. As new interfaces are deployed, they will be added to the scope of this document as appropriate, based on the use by the CLEC community and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.
- For Type 6 issues, the escalation process is agreed to allow BellSouth a three-day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Susan Hart Manager - EC Support Group Interconnection Operations	205-733-5393	1-800-946-4646 PIN 1436470	Susan.K.Hart@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
  - Definition and escalation of item.
  - History of item.
  - Reason for escalation.
  - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Sales Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Linda Tate Director (for Systems Issues)	404-927-7878	Linda.Tate3@bridge.bellsouth.com
	Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7828	Joy.A.Lofton@bridge.bellsouth.com
3rd Level	Doug McDougal Senior Director (for Systems Issues)	404-927-7505	Doug.Mcdougal@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, BellSouth and the impacted CLEC(s) agree to follow this Dispute Resolution Process. BellSouth and the CLEC shall assemble a Joint Investigative Team, within one week, comprised of subject matter experts. The party prompting the dispute should initiate the formation of the team. The team should be co-chaired by representatives of BellSouth and the CLEC respectively. The investigative team will conduct a root-cause analysis to determine the source of the problem, if one exists, and then develop a plan for remedying it. The parties to the dispute must escalate the issue within each company to the person who has ultimate authority for State operations in an effort to achieve a resolution.

If the dispute cannot be resolved between the companies after these steps are taken, then either party to the dispute may file a formal complaint with the State PSC through the Director of the Telecommunications section for binding mediation. The Director of the Telecommunications section, or his appointee, shall rule upon the complaint within 30 days of its filing. If either party is then aggrieved, it may file a formal complaint with the State PSC.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings. All changes will be submitted as a change request and reviewed.

10.0 TESTING ENVIRONMENT

BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, refer to the following BellSouth public Internet sites:

EDI

www.interconnection.bellsouth.com/markets/lec.html
Select "Customer Guides"
Select "Local Exchange Ordering Guides"
Select "BellSouth EDI Specifications – TCIF 9"
Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html
Select "OSS Information Center"
Select "TAG Documentation"

This site is password protected. You should obtain the password from your Account Team representative.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing Change Requests and defects/expedites.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
  - ◊ Dependencies relative to other data elements
  - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: BST cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects/expedites or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- Type 6 – CLEC Impacting Defect. Any non-Type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

  Type 6 – CLEC Impacting Expedite. The ability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.
  - **CT = Training.** Requested change already exists, additional training may be required.
- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).
- **D** = Request Purge. Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).

- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled**. Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

Defect/Expedite Status. The status of a CLEC Impacting Defect/Expedite Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
  - **CD = Duplicate Request.** A request for this change already exists.
  - **CT = Training.** Requested change already exists, additional training may be required.
- **I = Implemented.** Indicates a Defect/Expedite Change Request has been implemented in a release (Step 6).
- **N = New Defect/Expedite Change Request.** Indicates a Defect/Expedite Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect/Expedite Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect/Expedite.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Expedited Feature. An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect/Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

RF-1870
8/00

BELLSOUTH Change Request Form

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

Internal Reference # _____(1) Date Change Request Submitted ___/___/___(2)

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

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

Company Name_____(4)

CCM_____(5) Phone_____(6)

CCM Email Address _____(7) Fax_____(8)

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

Originator's Name _____(11) Phone_____(12)

Title of Change _____(13)

Category ☐ Add New Functionality ☐ Change Existing (14) Desired Due Date __/__/__(15)

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

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

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

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

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

Known dependencies (21)

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

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

BELLSOUTH

Change Request Form

This Section to be completed by BCCM only.

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

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

Status _____(27)

Change Request Review Date __/__/__(28) Target Implementation Date ___/___/__ (29)

Last Modified By _____ (30) Date Modified ___/___/___ (31)

Change Review Meeting Results (32)

_____

_____

_____

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

_____

_____

_____

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

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

_____

_____

_____

Agreed Release Date ___/___/___ (37)

CMVC #_____(38)
DDTS#_____(39)

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

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Change Request Form

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

Defect/Expedite Validation Results: (40)

Clarification Needed ☐ Yes ☐ No

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

Defect/Expedite Impacts Other CLECs? ☐ Yes ☐ No

Interfaces Impacted by defect/expedite: ☐ EDI ☐ TAG ☐ LNP ☐ LENS
☐ TCIF 7 ☐ TCIF 9

Target Implementation Date: _____

BELLSOUTH

RF1871
8/00

Change Request Form Checklist

All fields will be validated before change request is returned for clarification.

Field	Checklist	Description	Instructions	Action Required
1	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	No action	
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	Date entry required
3	Mandatory	Indicate type of Change Request: CLEC or BST Initiated, Industry Standard or Regulatory.	Return to sender	Company designation required
3a	Conditional	Indicate whether Change Request is a defect/expedite. Also provide OCN to assist with internal validation of defect/expedite.	Return to sender	Entry required (if the change is a Type 6)
4	Mandatory	Enter company name for the Change Request.	Return to sender	Company name required
5	Mandatory	Enter originating company's Change Control Manager's name.	Return to sender	CCM name required
6	Mandatory	Enter originating company's Change Control Manager's phone number.	Return to sender	CCM phone number required
7	Mandatory	Enter originating company's Change Control Manager's e-mail address.	Return to sender	CCM e-mail address required
8	Mandatory	Enter originating company's CCM's fax number.	Return to sender	CCM fax number required
9	Mandatory	Enter originating company's alternate contact name.	Return to sender	Alternate contact name required
10	Mandatory	Enter originating company's alternate contact phone number.	Return to sender	Alternate contact number required
11	Optional	Optional field for the company's internal SME requesting enhancement. This field can be for internal use only or you can choose to share it.	No action	No action
12	Optional	Optional field for the company's internal SME's phone number requesting enhancement. This field can be for internal use only or you can choose to share it.	No action	No action
13	Mandatory	For the purpose of referencing the Change Request, assign a short, but descriptive name.	Return to sender	Title required – maximum length 40 char.
14	Mandatory	Identify request category for the Change Request.	Return to sender	Category required
15	Optional	Enter desired implementation due date for the proposed enhancement.	No action	No action
16	Mandatory	Identify originating company assessment of impact.	Return to sender	Entry required
17	Mandatory	Identify originating company assessment of priority.	Return to sender	Entry required
18	Mandatory	Indicate interface(s) affected by the proposed Change Request.	Return to sender	Entry required
19	Mandatory	Indicate the type of change for the request.	Return to sender	Entry required
20	Mandatory	Describe the proposed change request, indicating the purpose and benefit of request. If additional space is needed, use additional space sheet.	Return to sender	Description of change request required
21	Mandatory	Indicate any known dependencies relative to the Change Request. If none are known, enter "None known".	Return to sender	Entry required

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RF1871
8/00

Change Request Form Checklist

Field	Checklist	Description	Instructions	Action Required
22	Mandatory	Indicate whether additional information accompanies/supports the proposed Change Request. If yes, list all documents attached or reference where they can be found, including internet address and standards reference, if applicable.	Return to sender	Supporting documentation must accompany request
23	Mandatory BCCM	A Change Request Log Number generated by "the Change Request Logging system" upon receipt of change request. The number should be sent back to the originator on the acknowledgment receipt. This # will be used to track the Change Request.	Return to sender	Log number - system generated.
24	Conditional BCCM	Indicates whether clarification is needed on the Change Request.		
25	Conditional BCCM	Date clarification request sent to originating CCM.		
26	Conditional BCCM	Date clarification due back from originating CCM.	Return to sender	
27	Mandatory BCCM	Indicate status of proposed change request (I.e. clarification, validation, pending, etc.)		
28	Mandatory BCCM	Assign date when change request will appear on Review Board agenda.	Return to sender	
29	Mandatory BCCM	A soft date for implementation. Updated based on Candidate Release Package info.		
30	Mandatory BCCM	Field that communicates who last updated the request.		
31	Mandatory BCCM	Field that communicates when the last update occurred		
32	Mandatory BCCM	Change Request results captured from the Change Review meeting.		
33	Conditional BCCM	Canceled Change Request reasoning.	Return to sender	
34	Conditional BCCM	Concurrence with Change Request originating company. Show date of concurrence.	Return to sender	
35	Conditional BCCM	Change Request Appeal indication.		
36	Conditional BCCM	Detailed description of the appeal considerations.		
37	Mandatory BCCM	Indicate agreed release date from Project Release Plan.		
38	Conditional BCCM	Indicate CMVC reference Number		
39	Conditional BCCM	Indicate DDTS reference Number		
40	Mandatory BCCM	Results of Internal Defect/Expedite Validation		

BELLSOUTH

Change Request Clarification Response

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

Log # _____ (1) Date Clarification Sent ____/____/____ (2)
Internal Reference # _____(3) Clarification Version # _____ (4)
Date Change Request Submitted ___/___/___(5)

☐ **TYPE 5 (CLEC)** ☐ **TYPE 4 (BST)** ☐ **TYPE 3 (INDUSTRY)** ☐ **TYPE 2 (REGULATORY) (6)**

☐ **TYPE 6 (DEFECT/EXPEDITE)** OCN _____(6A)
Company Name_____(7)

CCM_____(8) Phone_____(9)

CCM Email Address _____(10) Fax_____(11)

Alternate CCM _____(12) Alt Phone # _____(13)

Originator's Name _____(14) Phone_____(15)

Title of Change_____(16)

Category ☐ Add New Functionality ☐ Change Existing (17) Desired Due Date __/__/__(18)

Originating CCM assessment of impact ☐ High ☐ Medium ☐ Low (19)

Originating CCM assessment of priority ☐ Urgent ☐ High ☐ Medium ☐ Low (20)

Interfaces Impacted (21)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☐ LNP ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (22)			
☐ Software ☐ Product & Services ☐ Documentation	☐ Hardware ☐ New or Revised Edits ☐ Regulatory	☐ Industry Standards ☐ Process ☐ Other	☐ Defect/Expedite

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (23)

Known dependencies (24)

Additional Information ☐ Yes ☐ No (25)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable) _____

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

BELLSOUTH

Change Request Clarification Response Checklist

All fields will be validated before change request is returned for clarification.

Field	Checklist	Description	Instructions	Action Required
1	Mandatory	BellSouth Log number assigned to the original Change Request.	No action.	
2	Mandatory	Date Change Request Clarification sent to BCCM.		
3	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	No action.	
4	Mandatory	Version number for tracking clarifications.		
5	Mandatory	Date original Change Request sent to BCCM.	Return to sender	Date entry required
6	Mandatory	Indicate Type of Change Request: Type 6 (Defect/Expedite), Type 5 (CLEC), Type 4 (BST), Type 3 (Industry) or Type 2 (Regulatory)	Return to sender	Company designation required
6a	Conditional	If Type 6 Change Request, provide OCN to assist with internal validation of defect/expedite.	Return to sender	Entry required (if the change is a Type 6)
7	Mandatory	Enter company name for the Change Request.	Return to sender	Company name required
8	Mandatory	Enter originating company's Change Control Manager's name.	Return to sender	CCM name required
9	Mandatory	Enter originating company's Change Control Manager's phone number.	Return to sender	CCM phone number required
10	Mandatory	Enter originating company's Change Control Manager's e-mail address.	Return to sender	CCM e-mail address required
11	Mandatory	Enter originating company's CCM's fax number.	Return to sender	CCM fax number required
12	Mandatory	Enter originating company's alternate contact name.	Return to sender	Alternate contact name required
13	Mandatory	Enter originating company's alternate contact phone number.	Return to sender	Alternate contact number required
14	Optional	Optional field for the company's internal SME requesting change. This field can be for internal use only or you can choose to share it.	No action	No action
15	Optional	Optional field for the company's internal SME's phone number requesting change. This field can be for internal use only or you can choose to share it.	No action	No action
16	Mandatory	For the purpose of referencing the Change Request, assign a short, but descriptive name.	Return to sender	Title required – maximum length 40 char.
17	Mandatory	Identify request category for the Change Request.	Return to sender	Category required
18	Optional	Enter desired implementation due date for the proposed change.	No action	No action
19	Mandatory	Identify originating company assessment of impact.	Return to sender	Entry required
20	Mandatory	Identify originating company assessment of priority.	Return to sender	Entry required
21	Mandatory	Indicate interface(s) affected by the proposed Change Request.	Return to sender	Entry required
22	Mandatory	Indicate the type of change for the request.	Return to sender	Entry required

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

BELLSOUTH

Change Request Clarification Response Checklist

Field	Checklist	Description	Instructions	Action Required
23	Mandatory	Describe the proposed change request, indicating the purpose and benefit of request. If additional space is needed, use additional sheet.	Return to sender	Description of change request required
24	Mandatory	Indicate any known dependencies relative to the Change Request. If none are known, enter "None known".	Return to sender	Entry required
25	Mandatory	Indicate whether additional information accompanies/supports the proposed Change Request. If yes, list all documents attached or reference where they can be found, including internet address and standards reference, if applicable.	Return to sender	Supporting documentation must accompany request

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

Acknowledgment Notification (Sample)

1) **Change Request Log #:** *878*
(2) **Date Change Request Submitted:** *04/01/1998*
(3) **Date Change Request Received:** *04/01/1998*
(4) **Internal Reference #:** *ARX00000*
(5) **Date of Notification:** *04/04/1998*

(6) **Company Name:** *John Doe Telephone*

(7) **Title of Change:** *Creation of new EDI transaction for jeopardy processing – 870 transaction number.*

(8) **Request Category:** *Add New Functionality*

(9) **Response due date:** *04/08/1998*

(10) **BCCM Contact name**_____ (11) **Phone**_____

Cancellation Notification (Sample)

(1) **Change Request Log #:** *878*
(2) **Date Change Request Submitted:** *04/01/1998*
(3) **Date Change Request Received:** *04/01/1998*
(4) **Internal Reference #:** *ARX00000*
(5) **Date of Notification:** *04/04/1998*

(6) **Company Name:** *John Doe Telephone*

(7) **Title of Change:** *Creation of new EDI transaction for jeopardy processing – 870 transaction number.*

(8) **Cancellation Type:** *Duplicate Request*

(9) **Cancellation Acknowledgment Date:** *05/15/1998*

(10) **Cancellation Explanation:** *Same functionality as Change Request RWR52434.*

(11) **BCCM Contact name**_____ (12) **Phone**_____

Acknowledgment Notification Checklist

All fields will be validated prior to sending the Acknowledgment Notification.

Field	Checklist	Description	Instructions	Action Required
1	Mandatory	A Change Request Log Number generated by "the Change Request Logging system".	Return to sender	Log number - system generated.
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	
3	Mandatory	Date Change Request received by BCCM.	Return to sender	
4	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	Return to sender (if used).	No action.
5	Mandatory	Date of Change Request Notification.	Return to sender	Current system date/time.
6	Mandatory	Originating Company name of the Change Request.	Return to sender	
7	Mandatory	A short, but descriptive name (title) for referencing the Change Request.	Return to sender	
8	Mandatory	Identify request category for the Change Request.	Return to sender	
9	Mandatory	Response due date.	Return to sender	
10	Mandatory	BCCM Contact Name.	Return to sender	
11	Mandatory	BCCM Contact Phone Number	Return to sender	

Cancellation Notification Checklist

All fields will be validated prior to sending the Cancellation Notification.

Field	Checklist	Description	Instructions	Action Required
1	Mandatory	A Change Request Log Number generated by "the Change Request Logging system".	Return to sender	Log number - system generated.
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	
3	Mandatory	Date Change Request received by BCCM.	Return to sender	
4	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	Return to sender (if used).	No action.
5	Mandatory	Date of Change Request Notification.	Return to sender	Current system date/time.
6	Mandatory	Originating Company name of the Change Request.	Return to sender	
7	Mandatory	A short, but descriptive name (title) for referencing the Change Request.	Return to sender	
8	Mandatory	Canceled Change Request reasoning.	Return to sender	
9	Mandatory	Cancellation Acknowledgment Date	Return to sender	
10	Mandatory	BCCM Contact Name.	Return to sender	
11	Mandatory	BCCM Contact Phone Number	Return to sender	

Clarification Notification (Sample)

(1) **Change Request Log #:** *878*

(2) **Date Change Request Submitted:** *04/01/1998*

(3) **Date Change Request Received:** *04/01/1998*

(4) **Internal Reference #:** *ARX00000*

(5) **Date of Notification:** *04/04/1998*

(6) **Company Name:** *John Doe Telephone*

(7) **Title of Change:** *Creation of new EDI transaction for jeopardy processing – 870 transaction number.*

(8) **Request Category:** *Add New Functionality*

(9)[1] **Please Clarify:**

- ☐ Date Change Request Submitted (2)
- ☐ Company Name (4)
- ☐ CCM Phone (6)
- ☐ Fax (8)
- ☐ Alternate Phone (10)
- ☐ Category (14)
- ☐ Priority (17)
- ☐ Type of Change (19)
- ☐ Known dependencies (21)
- ☐ TYPE (3)
- ☐ CCM (5)
- ☐ CCM E-mail (7)
- ☐ Alternate CCM (9)
- ☐ Title of Change (13)
- ☐ Assessment of Impact (16)
- ☐ Interfaces affected (18)
- ☐ Description (20)
- ☐ Additional Information (22)

(10) **Response due by:** *04/08/1998*

(11) **BCCM Contact name**_____ (12) **Phone**_____

[1] The individual field references correspond directly to the Change Request Form.

Clarification Notification Checklist

Field	Checklist	Description	Instructions	Action Required
1	Mandatory	A Change Request Log Number generated by "the Change Request Logging system".	Return to sender	Log number - system generated.
2	Mandatory	Date Change Request sent to BCCM.	Return to sender	
3	Mandatory	Date Change Request received by BCCM.	Return to sender	
4	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the BellSouth Change Control Process.	Return to sender (if used).	No action
5	Mandatory	Date of Change Request Notification.	Return to sender	Default to current system date/time.
6	Mandatory	Originating Company name of the Change Request.	Return to sender	
7	Mandatory	A short, but descriptive name (title) for referencing the Change Request.	Return to sender	
8	Mandatory	Request Category	Return to sender	
9	Mandatory	Clarification Considerations - Numbers in parentheses refer to corresponding fields on the Change Request Form.	Return to sender	
10	Mandatory	Response due by date.	Return to sender	
11	Mandatory	BCCM Contact Name.	Return to sender	Default to BCCM.
12	Mandatory	BCCM Contact Phone Number	Return to sender	Default to BCCM Number.

BELLSOUTH

DATE _____

Letter of Intent

_____ gives this notice of its intent to implement a TCIF compliant interface for pre-ordering, ordering, or maintenance transactions with BellSouth, Inc. We are currently finalizing the development phase with a planned implementation date of _____.

Interfaces	❑ Pre-Ordering	❑ Ordering	❑ Maintenance
	❑ TAG	❑ EDI	❑ EC-TA Local
	❑ LENS	❑ TAG	❑ TAFI
		❑ LENS	

Comments:

Committing the Company: _____
(Print Name)

(Signature) _____

Return To: BCCM
FAX 205-321-5160

OR

Valerie Cottingham
8TH Floor
600 No. 19th Street
Birmingham, Alabama 35203

The CLEC agrees that it will begin commercial use of the interface selected above within six (6) months from the date of this LOI, and further agrees that if commercial usage does not begin within six (6) months, that this LOI will be canceled.

Release Management Project Plan Template

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Scope Statement

The project scope defines the boundaries by which the project will operate. The scope statement will be used to obtain agreement and approval from the customers and stakeholders for the project funding.

See Scope Statement Template

Communication Plan

The project team will determine the type and frequency of communications that must take place during the project life cycle to enable the project's success. The table below outlines the agreed to communication vehicles.

Status Communiqué	Distribution	Frequency	Owner
Project Release Status Report	• Team Members • Enhancement Review Team	• Weekly • Monthly	Project Manager
Team Member To Do List	• Team Member	• Weekly	Project Manager
Executive Summary	• Project Sponsor	• Monthly	Project Manager
Status Meeting/Minutes	• Team Members	• Weekly	Project Manager

All escalations will be communicated by the project manager to the project sponsor.

See Project Release Status Report
See CCP To Do List/Resource (part of Microsoft Project file - Custom Report)
See CCP To Do List/Dates (part of Microsoft Project file - Custom Report)

Project Tracking Plan

Project tracking and control is the process whereby the project manager determines the degree to which the project plan is being met. The focus is on the schedule, budget and resource allocations.

The project manager will hold regularly scheduled team meetings for the purpose of updating the Work Breakdown Schedule (WBS) with accurate information. During these meetings, all new issues will be raised and assigned to an owner for resolution. All existing issues will be reviewed for current status and/or closure.

Other documents to be updated during the team meetings are as follows:

- Change Control Plans
- Risk Management Plans
- Communication Plans
- Scope Statements
- Team Roster and Responsibilities

Project status will be created and distributed as defined in the Communications Plan.

Work Breakdown Structure

The project manager will develop a Work Breakdown Structure (WBS) in the appropriate project management software application, including tasks, durations, start/end dates, dependencies, personnel resources, and related costs. A draft version of the WBS will be created by the project manager and reviewed with the project team in an effort to effectively utilize the team's time. The WBS will be revised and agreed to by the entire team to facilitate activity ownership and commitment.

While creating the WBS, the team should consider all resource, time, budget and performance constraints associated with the project.

See WBS Template (part of Microsoft Project file - Gantt View)

Roles and Responsibilities

Project roles will be defined to clearly identify expectations among project participants. Update the table below with the correct project roles and responsibilities.

ROLES	RESPONSIBILITIES
Project Manager	Identify Preliminary Resources Hold Kick-off Meeting Develop Project Plan Documents Track Project Status Time Cost Manage Change Control Manage Issues Communicate Project Status
Project Sponsor	Understand Current Project Status Single Point of Contact for Escalations Communicate Project Status Define/Approve Milestone Exit Criteria
Stakeholder	Provide Team Members / External Project Support Understand Current Project Status Define Milestone Exit Criteria
External Project Support	Perform Agreed to Activities as Defined Provide Project Manager Status
Team Members	Attend Project Team Meetings Perform Agreed to Activities as Defined Provide Project Manager Status

Project Team Roster

A list of all parties associated with or impacted by the project should be documented and distributed to the team.

See Project Team Roster

Risk Management Plan

In an effort to mitigate possible negative impacts to the project, a high-level risk assessment should be performed during the initial phase of the project. For each high-level risk, the team should develop a mitigation strategy or position. As potential risks are identified during the project life cycle, the team should again develop a mitigation strategy or position.

See High-Level Risk Assessment
See Risk Event Assessment and Planning

Change Control Plan

Throughout the project life cycle, changes will be introduced which will impact the project scope statement. These changes could be due to a new customer need/requirement or a miss communication of an existing requirement. Each change must be evaluated to effectively understand the possible impact to resources, time and/or cost.

See Scope Change Request and Evaluation
See Scope Change Request Log

Project Issues

Day to day issues will be entered on a project issues log as an interim solution until further discussion can take place among the team. Each issue could result in the addition of a new activity to the WBS, a risk to be evaluated in the Risk Management Plan, or a change to be managed through the Change Control Plan.

See Project Issue Log

Scope Statement Template

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Project Definitions

PROJECT TITLE	
PROJECT MANAGER	
PROJECT TEAM MEMBERS	
GOALS/OBJECTIVES	
SCOPE STATEMENT	
ASSUMPTIONS	
MAJOR RISKS	
DELIVERABLES	
ACCEPTANCE CRITERIA	
PHASES	
KEY MILESTONES	
KEY RESOURCE REQUIREMENTS	
EXTERNAL CONSTRAINTS	
RELATED PROJECTS	

Project Release Status Report

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

PROJECT MANAGER	CURRENT PROJECT PHASE	SUPPORTING DOCUMENTATION ATTACHED?	WEEK ENDING DATE
		☐ Yes ☐ No	

Report Information

Status Changes from Last Report	✓	Explain
Assumptions	☐	
Scope	☐	

Schedule Information

High-Level Phase Deliverable	Original Complete Date	New Est. Complete Date	Actual Complete Date	Explanation

Budget Information

Project Tracking Element	YTD Budget	YTD Actual	YTD Diff.	% Diff.	Explanation

Deliverable Information

COMPLETED DELIVERABLES
DELIVERABLES DUE NEXT PERIOD

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

Work Breakdown Structure Template

Project Management WBS Template						
ID	Task Name	Duration	Start	Finish	Pred	Resource
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
2	**Define Requirements**	**3d**	**1/9/98**	**1/13/98**		
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
4	Meet to Baseline Requirements (several meetings)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
6	**Perform Analysis**	**4d**	**1/14/98**	**1/19/98**		
7	Analyze Requirements Document	1d	1/14/98	1/14/98	5	BST
8	Produce/Distribute Updated Requirements Document	1d	1/15/98	1/15/98	7	BST
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
10	Analyze/Finalize Updated Requirements Document	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code, unit test)	1d	1/20/98	1/20/98	10	All
12	**Perform Testing**	**5d**	**1/20/98**	**1/26/98**		
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
14	Perform Internal Testing (systems, integration)	1d	1/21/98	1/21/98	13, 11	All
15	**Perform External Testing**	**3d**	**1/22/98**	**1/26/98**		
16	Perform Network Validation Testing (NVT)	1d	1/22/98	1/22/98	14	All
17	Perform End to End Testing	1d	1/23/98	1/23/98	16	All
18	Perform Stress/Volume	1d	1/26/98	1/26/98	17	All
19	Make Go/No Go Decision	1d	1/27/98	1/27/98	18	All
20	**Deploy Release/Cut Over**	**11d**	**1/15/98**	**1/29/98**		
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
22	Develop Migration Plan Old to New (60-90 days) (Freeze Old Code)	1d	1/28/98	1/28/98	19	All
23	Perform Cut-Over	1d	1/28/98	1/28/98	19	All
24	Develop Post Implementation Audit Report	1d	1/29/98	1/29/98	23	All
25	**Perform Training**	**8d**	**1/20/98**	**1/29/98**		
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All
27	Develop Training Package	1d	1/21/98	1/21/98	26	All
28	Train Users	1d	1/29/98	1/29/98	23	All

To Do List by Resource as of 2/10/98

ID	Task Name	Duration	Start	Finish	Predecessors	Resources
Week of Jan 4						
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
Week of Jan 11						
4	Meet to Baseline Requirements (several mtgs)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
Week of Jan 18						
10	Analyze/Finalize Updated Requirements Doc	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code)	1d	1/20/98	1/20/98	10	All
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All
14	Perform Internal Tests (systems, integration)	1d	1/21/98	1/21/98	13, 11	All
27	Develop Training Package	1d	1/21/98	1/21/98	26	All
16	Perform Network Validation Testing (NVT)	1d	1/22/98	1/22/98	14	All
17	Perform End to End Testing	1d	1/23/98	1/23/98	16	All
Week of Jan 25						
18	Perform Stress/Volume	1d	1/26/98	1/26/98	17	All
19	Make Go/No Go Decision	1d	1/27/98	1/27/98	18	All
22	Develop Migration Plan Old to New	1d	1/28/98	1/28/98	19	All
23	Perform Cut-Over	1d	1/28/98	1/28/98	19	All
24	Develop Post Implementation Audit Report	1d	1/29/98	1/29/98	23	All
28	Train Users	1d	1/29/98	1/29/98	23	All

To Do List by Dates as of 2/10/98

ID	Task Name	Duration	Start	Finish	Predecessors	Resources
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
4	Meet to Baseline Requirements (several mtgs)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
7	Analyze Requirements Document	1d	1/14/98	1/14/98	5	BST
8	Distribute Updated Requirements Document	1d	1/15/98	1/15/98	7	BST
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
10	Analyze/Finalize Updated Requirements Doc	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code)	1d	1/20/98	1/20/98	10	All
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All

Project Team Roster

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Guideline: Use this roster format as guidance, expanding or condensing as necessary.

Project Management

PROJECT MANAGER	EMAIL	PHONE	PAGER	FAX

Sponsor/Stakeholder

PROJECT SPONSOR	EMAIL	PHONE	PAGER	FAX
STAKEHOLDER(S)	EMAIL	PHONE	PAGER	FAX

External Project Support

NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX

Project Team

NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX

High-Level Risk Assessment

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	EVALUATOR (PRINT)	SIGNATURE	DATE PREPARED

Instructions: Put a check in the column that provides the best answer. Use the attached sheets for an explanation of each item. After all items have been evaluated, provide an overall risk assessment based on the individual responses.

High-Level Risk Assessment

Risk Category	Level of Risk			
	Not Applicable	Low Risk	Moderate Risk	High Risk
Strategic importance				
Management support				
Budget availability				
Resource availability				
Project manager availability				
Time frame				
Clarity of and agreement on project objectives				
Participation in project definition				
Customer interest and involvement				
User involvement				
Technical complexity				
Technology maturity				
Relevant experience				
Supplier/contractor involvement				
Major obstacles				
OVERALL RISK				

Guidelines

Strategic Importance	Assess the strategic importance of the project. How essential is it to the planned corporate objectives or to the maintenance of current operations? The less essential the project, the greater the risk that it will not receive sufficient support and attention. *Low Risk:* The project has substantial strategic importance; it has either been mentioned directly as a major initiative or directly supports a major initiative. *Moderate Risk:* Failure to complete the project would jeopardize the achievement of major initiatives. Project sponsors would designate the project as "necessary." *High Risk:* The project does not directly relate to any major strategic initiatives. Project sponsors would designate the project as "nice to have."
Management Support	Determine the extent to which management throughout the company actively supports the project. Management support is essential if the project is to be effectively carried out. Management provides the resources by which the project is accomplished. *Low Risk:* Management in all organizations that will participate in the project actively supports the project initiative and willingly commits resources to the effort. *Moderate Risk:* Project sponsor provides strong support and establishes momentum among other managers who control resources. *High Risk:* Project sponsor is not strongly interested; no significant management attention or interest from any side.
Budget Availability	Evaluate the availability of funding to support the project. Determine whether funding will be available in the time frame necessary to carry out the work. Ensure funding is available for all resources—people, suppliers, material, computer time, and so on. *Low Risk:* Funding has been identified for the project, matching the time frame in which funds are required. *Moderate Risk:* Funding has not been identified specifically for the project; however, funding is available within established budgets and management has approved its use. *High Risk:* Funding has not been identified for the project, and funds are tight or unavailable within existing budgets.
Resource Availability	People are the most critical resource for the project. Evaluate the availability of human resources, assessing not only whether the required number of people are available but whether the right types of skills and experience levels are also available. *Low Risk:* A project team has already been identified with the requisite skills; team members have been committed to the effort. *Moderate Risk:* Project team members have not been identified specifically. Most skills are thought to be readily available within the company. *High Risk:* Project team members have not been identified. Resources are scarce, and obtaining the necessary skills will be difficult in the required time frame.
Project Manager Availability	The availability of a qualified project manager will increase the chances of project success. Assess whether a project manager is available and will be assigned to the project. *Low Risk:* A project manager has already been identified for the project and is available in the required time frame. *Moderate Risk:* A project manager has not been specifically identified, but qualified project managers are available. *High Risk:* No qualified project manager is available to assume responsibility for the project.

Time Frame	Assess the time frame in which the project is required. Tighter time frames increase overall project risk. There should be sufficient time to plan the project thoroughly and to accomplish all project tasks. *Low Risk:* There is sufficient time available for project planning and project execution, including provision for a reasonable amount of slack time to accommodate unforeseen delays. *Moderate Risk:* There is sufficient time for project planning and project execution, assuming an optimized schedule with an aggressive critical path. *High Risk:* Even with the most aggressive scheduling, the project time frame is unrealistic. Deadlines will possibly result in cutting corners to meet the schedule.
Clarity of and Agreement on Project Objectives	Assess the degree to which project objectives have been defined clearly. If the objectives are not clear, it is unlikely that the project will be carried out successfully. Also important is the extent to which the project objectives have been communicated and bought into by the company's organizational elements that will contribute to or support the project. *Low Risk:* Project objectives are clearly defined, have been communicated throughout relevant organizations, and have been agreed to. *Moderate Risk:* Project objectives have been generally defined, and there is general agreement with them. There is no detailed description of the objectives, however. *High Risk:* Project objectives have not been defined, or there is substantial disagreement with them among the organizations.
Participation in Project Definition	Determine whether the project has already been defined or if the project manager and project team will be allowed to participate in the project definition. Projects that are defined and handed to the project team are generally more difficult to complete than projects in which the project team participates in the project definition process. *Low Risk:* There is no current project definition; the project team will be a key player in the project definition process. *Moderate Risk:* There is a current project definition; however, the project team will have an opportunity to review and revise that definition during the planning process. *High Risk:* The project definition is already established; the project team will have no opportunity to revise it.
Customer Interest and Involvement	Evaluate the level of interest in the project on the part of the project's ultimate customer. Will the customer materially participate in the project's implementation? Customer interest and involvement is an important element in ensuring the project is completed as planned. *Low Risk:* The customer is actively interested in the project, has assigned a point of contact, and intends to participate in key project activities. *Moderate Risk:* The customer is interested in the project and intends to participate in some project activities. *High Risk:* The customer expresses little or no interest in the project and has no interest in participating in project activities.

User Involvement	Determine the extent to which users will be involved in the project. User participation can enhance the design and development processes and can streamline the project validation process. *Low Risk:* Users will definitely be involved with the project. A user team has been identified, and provisions have been made to provide adequate user participation. *Moderate Risk:* Users will likely be involved with the project; however, no specific plans have been made for their participation. *High Risk:* Users are unavailable to participate in the project.
Technical Complexity	The level of technical complexity is a direct contributor to overall project risk. Assess the complexity of the project with regard to the project's size, the type of system to be developed, the number of organizations that will participate, and the difficulty of the task. *Low Risk:* The project is technically straightforward. The system is limited to a specific application with little crossover or interface with other systems and applications. *Moderate Risk:* The project presents a technical challenge. The requirement is difficult to solve, or the system will perform multiple functions in concert with other systems. *High Risk:* The project is extremely difficult technically. There are substantial integration requirements with other systems.
Technology Maturity	Mature technology is easier to work with than emerging technology. Assess the level of maturity of the technology to be used in the system. Does the technology currently exist? Has it been proven in other applications? Will the technology be developed during the course of the project? *Low Risk:* Virtually all the technology to be used on the project has been used in other, proven applications. *Moderate Risk:* Most technology has been used in other applications. There will be some technology development during the project but that will be limited to specific functions and areas. *High Risk:* Most project technology will be developed during the project and must be proven during the validation and testing process.
Relevant Experience	Organizations that have experience with similar projects can complete projects with less risk than organizations doing a project for the first time. Determine whether the company has experience with projects that relate to or are similar to the contemplated project. *Low Risk:* The company has substantial experience with related or similar projects and can apply that experience to the current project. *Moderate Risk:* The company has some experience with related projects. *High Risk:* This is the first project of this type that the company has undertaken.
Supplier/ Contractor Involvement	Involving suppliers or contractors in the project can increase the risk, especially if the company has not worked with those organizations before. Determine the extent and anticipated difficulty of supplier involvement. *Low Risk:* Either few or no suppliers will be involved, or all suppliers have worked with BST on previous projects. *Moderate Risk:* Some suppliers will be involved; most will have worked with the company on previous projects. *High Risk:* Many suppliers will be involved. A significant number will not have worked with the company on previous projects.

Major Obstacles	Assess any other major obstacles that may exist. Identify the obstacles and whether it appears that they may be overcome. *Low Risk:* Few major obstacles exist; for those that exist, there are clear solutions. *Moderate Risk:* Some major obstacles exist; there are clear solutions for most of them. *High Risk:* A significant number of major obstacles exist for which there are no clear solutions.

Risk Event Assessment and Planning

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

RISK EVALUATOR	WBS REFERENCE	OTHER REFERENCE

Risk Event Title

ENTER ONE-LINE DESCRIPTION OF RISK EVENT

Description

PROVIDE DETAILED DESCRIPTION OF RISK EVENT

Probability

DESCRIBE THE PROBABILITY OF THE RISK EVENT OCCURRING. USE QUANTITATIVE METHODS IF APPLICABLE.

Impact

DESCRIBE THE IMPACT OF THE RISK EVENT. USE QUANTITATIVE METHODS IF APPLICABLE.

Exposure

PROVIDE AN ASSESSMENT OF THE OVERALL RISK. USE QUANTITATIVE TECHNIQUES IF POSSIBLE; OTHERWISE, USE CATEGORIZATION OF SERIOUS, THREATENING, OR MANAGABLE.

Risk Mitigation Strategies

Strategy Description	Strategy Type (Check One)			
	Avoid	Assume	Control	Transfer
ENTER A DESCRIPTION OF THE PREVENTATIVE STRATEGIES AND CONTINGENCY PLANS FOR THE RISK.				

Scope Change Request and Evaluation

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

(The following information must be filled in by the project manager)

Scope Change Request Information

CHANGE REQUEST NUMBER	DATE CHANGE REQUEST INITIATED	RESULTING CHANGE ORDER NUMBER	PROJECT LIBRARY FILE NUMBER

PRIORITY

☐ High ☐ Medium ☐ Low

General Information

SUPPLIER	CUSTOMER	CHANGE NAME (DESCRIPTION)

REFERENCES

SUBMITTED BY	DATE	INVESTIGATED BY	DATE STARTED	DATE COMPLETED

Impact Analysis

ALL PARTIES AFFECTED	INITIALS/DATE /
SCHEDULE IMPACT	INITIALS/DATE /
COST IMPACT	INITIALS/DATE /
QUALITY IMPACT	INITIALS/DATE /
PROJECT MANAGER'S RECOMMENDATION	INITIALS/DATE /

Scope Change Information

CHANGE APPROVED/REJECTED	DEFERRED TO	DATE
☐ Approved ☐ Rejected		

Approved By

CUSTOMER	DATE	BST IT	DATE

Scope Change Request Log

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

CUSTOMER	PROJECT LIBRARY FILE NUMBER

Log Information

Change Request Number	Priority H	Priority M	Priority L	Change Name (Description)	Assigned To	Date Opened	Date Approved	Date Closed	Cost Impact	Schedule Impact
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							

Project Issues Log

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE

Log Information

Issue ID	Issue Name/Description	Severity	Assigned to	Date Open	Follow-Up Date	Date Closed	Resolution

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

BST Maintenance/Defect Notification Document

Document Preparation Information

PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Maintenance Notification

Effective Date	Interface (s) Impacted	Identification #	Explanation

Defect Notification

Effective Date	Interface (s) Impacted	Identification #	Explanation

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

BELLSOUTH DEFECT NOTIFICATION (SAMPLE)

PREPARED BY: _____ **DATE PREPARED:**

CHANGE REQUEST ID:

DATE IDENTIFIED:

DEFECT TYPE: ☐ **DOCUMENTATION** ☐ **ELECTRONIC INTERFACE** ☐ **MANUAL**

INTERFACES IMPACTED:

PRE-ORDERING: ☐ **LENS** ☐ **TAG** ☐ **CSOTS**

ORDERING: ☐ **EDI** ☐ **LENS** ☐ **TAG** ☐ **LNP**

MAINTENANCE: ☐ **TAFI** ☐ **EC-TA LOCAL**

DOCUMENTATION IMPACTED: ☐**YES** ☐**NO**

EXPLANATION OF DEFECT:

WORKAROUND:

RESOLUTION:

Preliminary Priority List

Company Name: _____

CCCM: _____

Date Submitted: _____

Change Review Meeting Date: _____

Check Interfaces Used:

☐ LENS ☐ EDI ☐ TAG ☐ TAFI ☐ EC-TA ☐ CSOTS ☐ Manual

If you do not use an interface, do not rate the request.

Rate request on a scale of 1 to N, with N being the greatest. Rate by Category for each interface your company uses.

Pending Change Requests to be Prioritized			
Category	**Rating**	**Interface**	**Change Request Log #**
Pre-Ordering			
Ordering			
Maintenance			
Manual			

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

Monthly Status Meeting Agenda Template

Opening..... 5 Minutes

Facilitator/BellSouth opens meeting.

Regulatory Issues..... 10 Minutes

Review any issues that could impact Change Request(s) prioritization. This may include FCC rulings, PSC rulings or Industry Changes.

Change Request Status: **40 Minutes**

- **New**
- **Pending**
- **Scheduled**
- **Implemented**
- **Canceled**
- **Defects**
- ***Review status of all change requests***

Release Management & Implementation Status.....15 Minutes

Review status of scheduled Releases.

Issues/Action Items.....15 Minutes

Re-cap any issues and action items surfaced during the meeting. Each item is assigned an owner and a follow-up date.

Adjourn.....5 Minutes

Facilitator/BellSouth reviews next steps.

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

Change Review Meeting Agenda Template

Opening.....10 Minutes

Facilitator/BellSouth opens meeting.

Change Request Log Status.....30 Minutes

Change Requests to be reviewed will have a status of "P" for Pending and will follow the process flow as outlined in Part 2 – Detailed Process Flow.

Regulatory Issues.....30 Minutes

Review any issues that could impact Change Request(s) prioritization. This may include FCC rulings, PSC rulings or Industry Changes.

Release Management & Implementation Status.....30 Minutes

Review status of scheduled Releases.

Recycled Change Request(s).....30 Minutes

Determine priority disposition of Change Request(s) that are on the Candidate Request List, but have not been scheduled for a target release.

Presentation of Change Requests.....20 Minutes/Request

The presentation of each Change Request is limited to 20 minutes. The initiator of the request is allowed a maximum of five minutes of presentation time followed by a question and answer session not to exceed 15 minutes. Change Requests will be presented and prioritized by Interface.

Develop Candidate Change Request List.....60 Minutes

Participating companies will vote on the final prioritization of the Change Requests as indicated in the Change Review Section of the Change Control Process Document. Change Requests to be submitted for sizing and sequencing will be placed on the Candidate Change Request List along with the "Need-by-Date".

Present Outputs.....10 Minutes

Re-cap of final prioritization and Change Requests submitted to the Candidate Change Request List.

Issues/Action Items.....15 Minutes

Re-cap any issues and action items surfaced during the meeting. Each item is assigned an owner and a follow-up date.

Adjourn.....5 Minutes

Facilitator/BellSouth reviews next steps.

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

RF-1874
7/00

BELLSOUTH

Change Control Process User Registration Form

Date ___/___/___

Company Name _____

CCCM Assigned _____ Phone _____

CCCM Alternate _____ Alt Phone _____

CCM E-mail Address _____ Fax _____

CCM E-mail Alternate _____ Alt Fax _____

To receive Change Control correspondence, as well as system outages and defect notifications, you must subscribe to the BellSouth List Manager. To subscribe to the list manager, the CLEC should send an email to:

List.Manager@bridge.bellsouth.com

With the Subject Line: **SUBSCRIBE CCP**

It is not necessary to include a message with the email being sent, as the system will automatically subscribe the participant by using the sender's email address.

Interfaces Currently Used:	☐ Pre-Ordering	☐ Ordering	☐ Maintenance	☐ Manual
	☐ LENS ☐ TAG ☐ CSOTS	☐ EDI ☐ LENS ☐ TAG	☐ TAFI ☐ EC-TA Local	

Comments _____

Form Completed By
(Signature) _____

Minimum requirements to participate in the Change Control Process: Word 6.0 and Excel 5.0 or greater, Internet E-mail address, Web access

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

BELLSOUTH

Change Control Process
User Registration Form

RETURN TO:

BCCM
FAX 205-321-5160

OR

Valerie Cottingham
8th Floor
600 No. 19th Street
Birmingham, AL 35203

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

BELLSOUTH

Change Control Process
CR LOG Legend

CR LOG #	Log number assigned to each change request.
Status	Status of change request: N=New (being reviewed for acceptance), P=Pending (accepted-to be prioritized), PC=Pending Clarification, S=Scheduled for a Release, I=Implemented in a Release, C=Canceled Request, V=Validated Defect, W=Workaround Identified, CRC=Change Review Complete, RC=Candidate Request for a Release
Type	Type of CR: Type 2=Regulatory, Type 3=Industry Standard, 4=BST Initiated, 5=CLEC Initiated, 6=CLEC Impacting Defect
Title	Title of Change Request
Step 1 **Date Sent/Date Received**	Date CR was sent/received by Change Control
Step 2 **Open & Validate CR (Target Date)** • **Types 2-5 (target is 3 bus days)** • **Type 6 (target is 1 bus day)** **Clarification Date Sent (if needed)** **Clarification Response Rec'd Date** **Open & Validate CR (Actual Date)**	Target date for the Change Control Team to open CR and validate for completeness. Interval is 2-3 business days from date received (for Types 2-5). Interval is 1 business day for Type 6 (defects). During this step, a CR Log # is assigned, acknowledgment notification is sent to originator, CR is reviewed for mandatory fields and completeness. Date clarification was sent to originator of CR. Clarification times would be in addition to cycle time. Date clarification response was received from originator. Actual date CR was opened and validated by Change Control Team.
Step 3 **Review CR for Acceptance (Target Date)** • **Types 2-5 (target is 20 bus days)** • **Type 6 (target is 3 bus days for internal validation, an additional 4 bus days to develop workaround if, applicable)** **Clarification Sent Date (if needed)** **Clarification Response Rec'd Date** **Review CR for Acceptance (Actual Date)**	For Types 2-5, target date to review CR and determine status (20 bus day interval). CR reviewed for impacted areas. Status codes include: Pending, Pending Clarification or Canceled. For Type 6- status codes include: Pending, Pending Clarification, Validated Defect, Workaround Identified or Canceled. Date clarification notification was sent to originator of CR. Clarification times would be in addition to cycle time. Date clarification response was received from originator. Actual date CR was accepted or results provided to originator for review/discussion. Date CR was canceled and notification provided to originator/CLEC community.

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

BELLSOUTH

Change Control Process
CR LOG Legend

Cancel CR Notify Date	**NOTE**: the originator at any step in the process can cancel a CR.
Step 4 **Prepare for CRM (Target Date)** • **5-7 business days prior to CRM date** **Prepare for CRM (Actual Date)**	Target date for the Change Control Team to prepare for the Change Review Meeting (prioritization meeting). Target date is to provide CLEC community with updated Change Request Log and meeting details 5-7 business days prior to CRM meeting. Actual date CRM details were provided to CLEC community.
Step 5 **CR Meeting Date (Actual)**	Actual date of Change Review Meeting.
Step 6 **Doc Chg Rev Mtg Results (Target)** • **2 business days** **Doc Chg Rev Mtg Results (Actual)**	Target date for Change Control Team to provide the meeting minutes from the Change Review Meeting to CLEC community (2 bus day interval). Actual date meeting minutes were distributed to CLEC community from Change Review Meeting.
Step 7 **Internal Change Mgmt Process (Target Date)** • **30 business days** **Internal Change Mgmt Process (Actual Date)**	Target date for CLECs/BST to perform analysis, impact, sizing and estimating activities for the Candidate Change Requests that were prioritized in the Change Review meeting. Target interval is 30 business days. Actual date that CLECs/BST complete the Internal Change Management Process of analysis, impact, sizing and estimating activities for Candidate Change Requests.
Step 8 **RPM (Actual Date)**	Actual date of Release Package Meeting where Change Control Team presents the proposed scope for the next major release.
Step 9 **Rel Pkg Notify (Target Date)** • **2 business days** **Rel Pkg Notify (Actual Date)**	Target date for Change Control to develop and distribute Release Package Notification via web (target of 2 bus days). Actual date release package notification was posted to web.
Step 10 **Rel Imp (Actual Date)** **Soft Rel Notif (Target Date)** • **30 calendar days prior to release**	Actual date of the Release associated with the CR. Target Date for BST posting Release Notification (target is 30 calendar days in advance of release implementation). Actual date release notification letter is posted to web.

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

BELLSOUTH

Change Control Process
CR LOG Legend

Soft Rel Notif (Actual Date) **Doc Changes Notif (Target Date)** • **30 calendar days prior to release** **Doc Changes Notif (Actual Date)**	Target Date for BST posting documentation changes (business rules) associated with a release (target is 30 days in advance of release implementation). Actual Date documentation notification is posted to web.
Doc Updates Only Notif (Target Date) • **5 business days prior to documentation posting date** **Doc Updates Only Notif (Actual Date)**	Target date for BST posting notification letter for documentation updates (non-system) changes only. Target is 5 business days prior to documentation posting date. Actual date CLEC notification letter is posted to the web announcing the documentation only changes to be posted.
Notes	Area to document additional status information for each CR (i.e., date workaround notification is provided, escalations, etc.).

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

Transmittal Cover Sheet for Pate Exhibit RMP-6

This sheet transmits the

February 29, 2000
EICCP Steering Committee Meeting Minutes

which consists of 4 pages.

BELLSOUTH

EICCP Steering Committee
Meeting Minutes

DATE: February 29, 2000

MEETING: EICCP Steering Committee

PURPOSE: Review Interim Change Control Process

ATTENDEES

Tyra Colbert, MCI	Brian Rutter, KPMG	Valerie Cottingham, BST
Sandy Evans, Sprint	Jill Williamson, AT&T	Edwardine Marrone - BST
Kevin McAllorum, AT&T	Pat Rand, BST	Mary Conquest – ITC-DeltaComm
Bill Shoemaker, BST	Cassandra Daniels, BST	Cheryl Storey, BST

AGENDA

Agenda — This was a follow-up conference call meeting to review BST's input regarding the recommended changes made to the Change Control Process during the February 16-17 workshop.

SUMMARY OF MEETING

TOPIC	*DISCUSSION*
Opening	The BCCM opened the meeting and covered the items we were to accomplish on this conference call. • The purpose of the meeting was to discuss the updates from BST internal review of the recommended changes made as a result of the 2/16 and 2/17 workshop. • The BCCM provided a summary of the items that were accepted as a result of the internal BST review. • Those items that were not accepted in total were discussed and for most issues, resolution was reached or was documented in the open issues in these minutes. • Quite a bit of discussion surrounded the defect category. As a result, a type 6 was recommended and accepted by the team. • Another issue was the number of releases. BST will plan on having quarterly releases, and when appropriate point releases as needed. • The following notes include the action items from the workshop and the resolutions agreed to in the meeting. • Another conference call will be needed to discuss the forms and the changes to the forms. Agreement on what and where new items need to be placed will be discussed.

Workshop Action Items	***DISCUSSION***
	The following outstanding items were carried over from the February 16-17 workshop where recommended changes were made to the Change Control Process including an escalation and defect notification process. Most of these items were addressed during this meeting: 1. Determine types of calls the ECS Group and CSM take from the CLEC client community. (Closed) 2. Determine handling of System Outages. (Closed) 3. Backup support for CSMs. (Open) 4. Regulatory statements/changes – will BST notify CLEC community if they are not going to comply or if they plan to apply for extension, etc. (Open) 5. Escalation process – determine who will send the acknowledgement to the CLEC (AVP, VP or Change Control Team). (Closed) 6. Transitioning to the new process. (Open) 7. Test environment for CLECs. (Open) 8. More frequent releases. (Closed) 9. When we are making a change to one interface, will BST change all interfaces that would be impacted by that change? (Closed) 10. Retirement of existing interfaces – verify timeframes with OBF. (Open) 11. Proxy voting. (Closed) 12. Amount of time BST needs to develop a workaround for Type 1, Severity 2 defects. (Closed) 13. Provide ECS contact information. (Closed) 14. Web posting of release status and release notification information. (Open) 15. Jill Williamson (AT&T) to submit a change request to revisit EDI/TAG testing guidelines. (Open)

Workshop Changes	
	The following CLEC requests have been incorporated into the **Interim Change Control Process**: • Manual processing requests • Added TAG interface • Eliminated Steering Committee • BCCM is the point of contact for Change Requests Types 2-6 • Multiple change requests • Emergency defects – system outage handling and notification process • Joint Change Request prioritization for Types 4 & 5 • More frequent status meetings (monthly) • Eliminated the need for submitting draft priority list in advance • Improved intervals for accepting Change Request for prioritization • Improved CLEC number of participants • Included Defect Notification & handling process • Included Escalation Process • Detailed contact information for all Change Request types and escalation levels • Clear and defined intervals for notifications • Increased BST FTE to manage Change Control Process • Improved Communications and Notifications

Process Changes/Review	***DISCUSSION***
	Each section of the Interim Change Control Process was reviewed. Changes agreed upon are reflected in the Action Items. For Type 1 System Outages, BST is working to combine the Electronic Communications Support (ECS) Helpdesk and EDI Helpdesks.

Future Meetings	
	It was agreed that we would schedule monthly status meetings and incorporate prioritization meetings with the status meetings as needed. BST is moving toward a quarterly release schedule and point releases as needed.

CLEC Concerns	
	The following concerns were expressed by the CLECs: • E-mail notifications. BST should send a notification via email to indicate that a notification has been posted to the web for Type 1 System Outages. • Escalation to Sales Group versus IT/Operations. • Defect Notification process • Process does not address all areas of severity • Web posting

Summary of Requested Changes	
	The Change Control Team will make the following changes to the Interim Change Control Process document: • Include billing under "Objectives" in the Introduction section • Change number of participants for the meetings. Each party may bring the number they feel needed to represent their positions. • Remove the sentence under the CCCM description associated with thirty-three days. • Change the cycle time for Step 3 to 15 days (Types 2-5). • Add Type 6 – CLEC Impacting Defects. Remove "defect resolutions" from Types 4 & 5. • Include verbiage to indicate that escalation applies in all phases of the process flows. • For Defect Notifications, remove the statement "this may be adjusted according to defect complexity" for Step 4 Cycle time. • Define Step 4 for defect notification to include how the workaround will be communicated to the CLEC (i.e., conference call). <u>**Other Action Items**</u>: • BST is currently looking at incorporating the initial notification for Type 1 System Outages via email to all impacted CLECs. • CSM after hours support to report defects.

	• OBF timeframes regarding retirement of interfaces. • Copy of notification templates for next meeting. • Status of pending change requests for AT&T.

Closure	*DISCUSSION*
	Our next conference call will be rescheduled due to the Loop Qualification & ADSL/HDSL electronic ordering meeting that will take place on March 21. The rescheduled date for the next Steering Committee conference call is **Thursday, March 23, 2000 at 9:00 AM – 12:00 EST**. The conference bridge is: **205-969-4212, access code 8719.** Implementation of the Interim Change Control Process is targeted for April 2000.

Transmittal Cover Sheet for Pate Exhibit RMP-7

This sheet transmits the

Carrier Notification Letter SN91081679

which consists of 1 page.

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91081679

Date: March 23, 2000

To: Competitive Local Exchange Carriers (CLEC)

Subject: Change Control Process (CCP)

The BellSouth Electronic Change Control Process (EICCP) will be enhanced and renamed the Change Control Process (CCP). The following changes are proposed by the EICCP Steering Committee:

- BellSouth - initiated changes that affect CLECs.
- A synchronization of manual and electronic interfaces.
- Recognized software and documentation defect notification processes.
- Formalized escalation processes.
- Prescribed system outage processes.

The Interim Change Control Process documentation was posted to the Web on March 22, 2000, for your review at the following Web site:

http://www.interconnection.bellsouth.com/markets/lec/eiccp/eiccp.html

Please provide comments and/or questions to the Change Control Management Team at Change.Control@bridge.bellsouth.com by no later than April 10, 2000.

Sincerely,

ORIGINAL SIGNED BY JIM BRINKLEY

Jim Brinkley – Senior Director
Interconnection Services

Transmittal Cover Sheet for Pate Exhibit RMP-8

This sheet transmits the

Carrier Notification Letter SN91081733

which consists of 1 page.

BELLSOUTH

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91081733

Date: April 14, 2000

To: Competitive Local Exchange Carriers (CLECs)

Subject: BellSouth Change Control Process (CCP) Web Site

Effective Monday, April 17, 2000, BellSouth will implement its Interim CCP. This process will allow BellSouth and CLECs to manage requested changes to the BellSouth Local Interfaces. The Interim CCP will also provide for the identification and resolution of issues related to Change Requests.

In an effort to provide enhanced communication to the CLEC community, BellSouth will implement a new Web site for the Interim CCP. This new Web site will contain general information about Interim CCP, all documentation, including appropriate Change Request forms. The Web site will also provide data regarding current status of Change Requests, system outage log and defect notifications. The new Web site will be available on Monday, April 17, 2000, and will be located at the following address:

http://www.interconnection.bellsouth.com/markets/lec/ccp

Since the Interim CCP may be new to some CLEC participants, a Power Point training presentation is available under the "Processes" section of the CCP Web site at the address detailed above.

In addition, Interim CCP will begin email notification for system outages and defect notification. Currently, e-mail notification is sent to those CLECs that have registered with BellSouth to participate in the Interim CCP. To join Interim CCP, complete the User Registration Form, RF1874, located on the CCP Web site and send via email or fax to Interim CCP's mailbox at change.control@bridge.bellsouth.com. BellSouth encourages all CLECs to manage the subscription of their appropriate participant for email notification. It is BellSouth's goal to provide the most accurate and timely notification to its CLEC customers.

Please contact your BellSouth account team representative with any questions.

Sincerely,

ORIGINAL SIGNED BY JIM BRINKLEY

Jim Brinkley – Senior Director
Interconnection Services

Transmittal Cover Sheet for Pate Exhibit RMP-9

This sheet transmits the

June 26, 2000 CCP Monthly Status Call Minutes

which consists of 10 pages.

BELLSOUTH

Change Control Process
Monthly Status Meeting Minutes

DATE: June 26, 2000

MEETING: Monthly Status Call

PURPOSE: Review Status of Pending/Approved Change Requests

ATTENDEES

Tyra Colbert, WorldCom	Steve Murray, Rhythms	Valerie Cottingham, BST
Sandy Evans, Sprint	Brian Rutter, KMPG	James Hunter, KPMG
Ron Thompson, Nextlink	Steve Hancock, BST	Shamone Stapler, ITC-DeltaCom
Annette Cook, e.spire	Cheryl Storey, BST	Jill Williamson, AT&T
Carol Harrison, Impower	Michael McLaughlin, dset	Rhonda Calvert, Adelphia
Peggy Rehm, Nightfire	John Duffey, FL PSC	Mubeen Saifullah, Nightfire
Brenda Files, BST		Phyllis Burt, Quintessent
		Mickey Dossey, Quintessent

AGENDA

Agenda — Review status of pending/approved Change Requests (including defects), review current Release Management statuses and discuss Interim Change Control Process.

SUMMARY OF MEETING

Opening

The BCCM opened the meeting and covered the items we were to accomplish on this conference call:

- Review of outstanding action items
- Review regulatory mandates
- Review status of pending/approved Change Requests
- Review status of pending defects
- Report of system outages
- Review current Release Management statuses
- Open Discussion – Interim Change Control Process
- New Issues/Action Items

Regulatory Mandates

CR0059 – Change TN Reservation Period to 45 days (pre-ordering functionality)
FCC Docket # 99200
Order # FCC00-104
Posted 6-16-00
Order becomes effective July 17, 2000

Outstanding Action Items

1) Owner: BellSouth (OPEN)
Tyra Colbert – Worldcom has asked that BellSouth investigate application to application version availability issues such as a) when will an older version of an interface be de-commissioned, b) does BST keep two versions operating at all times. Tyra asked that BellSouth include verbiage in the Interim CCP document addressing these issues and related versioning intervals.
Status: BellSouth does maintain two TCIF issues (versions). BellSouth developing verbiage for Interim CCP guide & will present to CLECs for input.

2) Owner: BellSouth (OPEN)
As a result of the discussion around the Expedited Feature process, the CLECs requested additional time to review the draft of this process. BellSouth requests that the CLECs send all comments and suggestions to Change Control. BellSouth will conduct another CLEC conference call to review comments and have further discussion.
Status: BellSouth reviewing comments from CLECs. Plan to conduct another CLEC conference call in the July timeframe to review.

3) Owner: BellSouth (OPEN)
CLECs are requesting that the communication of the test window for testing new releases be included in the Change Control Process.
Status: CLECs provided clarification that they would like Change Control to communicate what the test window is for when new releases are implemented. For example, is it a 30 day window or a 2 day window. Also include the test window for point releases. Is there a standard? What is the BellSouth schedule for testing (i.e., code, systems, etc.)

4) Owner: BellSouth (CLOSED)
CLEC Distribution list will be sent to the CLECs for validation of appropriate participants.
Status: Distribution list sent 5-26-00.

5) Owner: AT&T (OPEN)
Jill Williamson to provide porting examples for CR # EDI0812990004. Jill advised she would provide examples during the 6/28/00 Change Review Meeting.

New Change Requests (Types 2-5)	ORD030200_001 – UNE via ASR21 ***Status***: Clarification provided by AT&T on 6-20-00 to include capability for Enhanced Extended Loops (EELs) ordering via the ASR. Change Control stated BellSouth's position regarding this request. Today you can order interoffice trunking via the ASR, but not loops. The LSR is the ordering document to be used to support all requests for which the CLEC/IXC/Customer resales services or collects revenues from an end user customer. Local UNE Loops are handled by the LCSC using the LSR. There are no plans to use the ASR for UNE products handled by the LCSC. EELS should be ordered on the LSR. The exception is for bulk conversion of existing access EELs to UNE EELS. There is a spreadsheet that can be completed by the CLEC and they will be converted. Jill (AT&T) has requested that BellSouth provide a specific list of fields and rules that are not contained in ASR21 or higher that BellSouth would need to process a UNE Loop or EELs. Change Control will coordinate a conference call with BST and interested CLECs to discuss further. Change Control will also obtain additional information about the conversion spreadsheet and share with CLEC community. ORD032700_001 – Post-FOC Clarification ***Status:*** Escalated to 2nd level. BST investigating other ways information can be validated before orders are submitted. Following up for status. EDI030200_001 – LNA of C ***Status***: Jill (AT&T) advised this request could be canceled. CR0012 – TAFI Functionality via ECTA Interface ***Status***: Jill (AT&T) advised this request could be canceled. CR0018 – USOC Segmentation ***Status:*** The CLEC USOC Manual can be downloaded from the web with the pdf format for read/printing purposes. The .csv file can be downloaded and manipulated. Change Control continuing investigation for res/bus indicators. CR0027 – FOC on ReqTyp CB not displaying listing order information (manual orders) ***Status:*** Provided BST response on 6-9 to originator for review and feedback. CR0028 – Document LSOG 2 & 4 Differences ***Status***: Provided BST response to originator 6-8-00 for review and feedback. Too costly and labor intensive for BST to create and maintain. The LSOG forms are the property of ATIS. BellSouth does not establish the differences. The BBR-LO is the tool to use for populating the LSR for LSOG 4. Shamone (ITC Deltacom) to check with Mary Conquest for status. CR0033 – EDI Multiple ReqTyp Enhancement ***Status:*** Pending Clarification for examples of what is submitted manually today. CR0040 – Order Tracking Request ***Status:*** Provided BST response to originator on 6-21-00 for review and feedback. Change Control to confirm if order tracking information would be provided real time. Jill (AT&T) to also review BST response to see if she has additional questions. Jill advised there is a LSR report that reflects all the order tracking information they are requesting; however the information is not real time. If it is confirmed that the tracking information would be real-time and if there are no additional issues/concerns, this CR will be added to the prioritization list for the 6/28 meeting.

	CR0044 – LENS Calculate Due Date Enhancement ***Status:*** Pending Clarification for additional information. CR0046 – EDI Reject Process Modification ***Status:*** Provided BST response to originator on 6-9-00 for review and feedback. Currently in 1st level escalation. Fatal rejects were designed to prevent delays in the processing of the LSR. If these rejects were reduced or removed, the LSR could further delay the process by containing incomplete required fields which would cause the LSR to have to be re-submitted numerous times and could impact systems on the backend, thereby causing the LSR to be rejected later in the process. 1st level escalation response due 6-26-00. CR0052 – WSOP Field Requirements ***Status*** – Provided BST response to originator 6-9-00 for review and feedback. The WSOP field is an optional field but is only required if there is working service at the end user location and the CLEC does not want to use that service. The CLEC has the option to indicate how the working service should be processed. CR0053 – CLEC Ordering Guide – LSOG 4 ***Status***: Pending Clarification for recommendations on improvements to the BellSouth Business Rules-Local Ordering guide. CR0058 – Fraud Management Process **Status**: Jill (AT&T) advised this request could be canceled. It has been determined by AT&T's Account Team that AT&T's Interconnection Agreement will handle the 1st part of the change request. The 2nd part of the request should be handled through AT&T's Account Team since it has been determined this is not within the scope of the Interim Change Control Process. CR0065 – Add LENS 6.3 Tutorial **Status:** Change Control to follow up with Trivergent to see if request is still needed. CR0086 – Ordering EELs via ASR **Status:** Tyra (WorldCom) advised this request could be canceled since it is a duplicate of ORD030200_001. ORD030200_001 will be changed to reflect originators of both AT&T and WorldCom. CR0088 – Unbundled Terminating Wire (UNTW) Loop Service requests via EDI **Status**: Currently being reviewed for acceptance.

Pending Change Requests	The following change requests are in "Pending" status and will be prioritized at the June 28, 2000 Change Review meeting: • EDI0812990003 - 411 Drops • EDI0812990004 - One LSR to change the main account number on "J" REQTYP • EDI0812990005 - Handling of Remaining Lines when main account is migrating • TAG0812990001- Provide CFA and NC/NCI via TAG Pre-Order • EDI0812990007 - Lift LEAN/LEATN restrictions • TAG0812990003- Parsed CSR • EDI121599001 - TN vs. RSAG validation • EDI02090001 - Electronically Order Routing to OS/DA • EDI030300_001 – BST Test Environment • CR0002 - Pre-Order/Order Business Rule Discrepancies • CR0003 - RPON Business Rules and Error Messages • CR0014- LENS Screen Change on Change Orders • CR0015 – LENS – ACT of C – Change Basic Class of Service • CR0016 – Service Inquiry Enhancement for SL1, SL2, DS0, DS1 and ISDN loops • CR0020 – View Multiple CSRs Simultaneously • CR0029 – Partial Migration of UNE Loops (ReqTyp A) • CR0030 – UNE to UNE Migrations • CR0031 – Change Listing Account in LENS • CR0038 – TOS Field on LSR ReqTyp J (TCIF 9) • CR0042 – Open IWBAN Field on EU Form • CR0045 – LENS 6.3 Conversion As Is – Not Stripping Non-Resellable USOCs • CR0047 – Display Enhanced MemoryCall Access Number in LENS • CR0062 – Open ReqTyp P/2nd TOS of E to identify Centrex Services (manual) • CR0078 – Extended Loops via EDI • CR0085 – Web-based LSR

Scheduled Change Requests	The following Change Requests are scheduled for upcoming releases: • **CR0022 Matrix for Issue 9 Flow-through – 6/30/00 BBR-LO update (target)** • **EDI0812990001 Electronic ordering for unbundled XDSL loops – Rel. 7.0 (7/00 target)** • **TAG0812990002 DSL Capability – Rel 7.0 (7/00 target)** • **OSS011300_001 LNA of G for LENS – Rel 7.0 (7/00 target)** • **CR0071 ECCKT data on FOC/CN with CLS or CLF – Rel 7.0 (7/00) Target** • **CR0073 Return ported number on FOC/CN – Rel 7.0 (7/00) Target** • **CR0074 TAG is requiring the EU-Address in error for ReqTyp E, ACT of C – Rel 7.0 Target (7/00)** • **CR0075 LESOG is clarifying for 1MBFE in error – Rel 7.0 Target (7/00)** • **CR0077 Subscription Version Cancellations – Targeted for 8/27/00** • **LSR0623990001 Redirection of UNE LSRs in the LCSC – Targeted for 9/17/00** • **CR0084 – TAG 2.2.0.8 Security Exception Error Defect – Targeted for Rel. 7.0 (7/00)** • **CR0090 – EDI/TAG LSR Auto-Clarify – Targeted for LNP Release 4.2 on 7/9/00.**

Implemented Change Requests	• CR0054 – Versioning Defect 5.23.00 – implemented 5/24/00. • TAG011700_001 – LNA of G implemented 6/1/00. The following change requests were implemented with Release 6.4 on 6/17/00: • CR0060 – KY NPA Split (606/859) • CR0061 – NC Overlay for 704/980
Canceled Change Requests	The following change requests were canceled during May 2000: CR0025 – Clarification of ATN Usage Rules – clarification only CR0032 – TN Reservation – canceled by originator CR0034 – ACT code "T" (EUMI Field) – clarification only CR0035 – One Page SUP for DD Changes – to be included in a future request CR0036 – Transfer of Call Options – INP REQTYP B – clarification only CR0037 – AIN Internet Call Waiting – new product offering CR0041 – Documentation of Interface Changes and Releases – Jill (AT&T) confirmed this request could be canceled since this is a BellSouth business practice CR0048 – Fields that can not be changed on a SUP – clarification only
New Defect Change Requests (Type 6)	The following defect change requests statuses are provided: • CR0063 – Incorrect Call Forwarding number given for Memory Call (BellSouth) ***Status:*** Open - The defect was unable to be re-created. System test revealed the system is working properly. • CR0066 – Invalid USOC for Basic Class of Service Format-SAE 434 II CREX7/TN (AT&T) ***Status:*** Scheduled – BellSouth has determined that this request is not a defect as the system is operating according to the baselined requirements, however due to the nature of this request and its potential impact to other CLECs, BellSouth will implement this as an expedited feature, which will allow the CREX7 to work with Port/Loop Combos. This feature is scheduled for Release 7.0. • CR0067 - Call Return invalid with class of service USOC UEPRX (AT&T) ***Status:*** Implemented – A defect was discovered and the rate database has been provisioned to allow Call Return to work with the UEPRX/UEPRL effective 6/2/00. • CR0068 – Pipe-cross USOC defect (AT&T) ***Status:*** Open - This was determined not to be a defect in the LNPGW system. The LNPGW is responding/reacting to the LSR based on what is populated on the CSR. However, there is apparently a gap in requirements and BellSouth will open a change request to modify the requirements. • CR0069 – Reserving telephone numbers (BellSouth on behalf of Adelphia) ***Status:*** Open – This is not a defect. The ATLAS system is working according to the baselined requirements.

- CR0070 – Call Forwarding USOC Defect (AT&T)

Status: Open - BellSouth determined this not to be a defect. The USOC populated is not valid with the FID provided. The USOC GCE is call forwarding busy line, the CFND FID with RCYC is for call forwarding don't answer. Waiting on CLEC to inform when request can be closed.

- CR0072 – LEO SHOULD PULL THE BAN1 FROM THE SERVICE ORDER AND SEND BACK ON THE FOC/CN (BellSouth)

Status: Verified - This has been determined as a defect and has been targeted for a future release.

- CR0076 - LESOG IS FAILING TO GENERATE PORT SIDE OF ORDER WHEN ADDING LINE (BellSouth)

Status: Verified - This has been determined to be a defect and has been targeted for a future release.

- CR0079 - TAG IS REQUIRING "INIT" (BellSouth)

Status: Open – BellSouth determine that this request is not a defect. The system works per requirements.

- CR0080 - LESOG is failing to issue Port Loop Combo accurately (BellSouth)

Status: Verified - Electronic System Support (ESS) has determined that this is a defect and will be corrected in a future release.

- CR0081 - LESOG is populating an incorrect due date interval on SL1; ACT of A; (ISSUE 9) (BellSouth)

Status: Open – BellSouth is still investigating internally using a testing environment..

- CR0082 – LEO IS FAILING TO EDIT FOR LOCQTY (BellSouth)

Status: Open – BellSouth requested further clarification from originator.

- CR0083 – CUSTOMER SERVICE RECORD ERROR MESSAGE (Advanced Tel)

Status: Open – BellSouth has requested further clarification from originator.

- CR0089 – RESERVING NUMBERS IN LENS (Advanced Tel)

Status: Open – BellSouth has requested further clarification from originator.

- CR0087 – "C" Order Process for UNE P – (Sprint)

Status: Open – This request was originally sent as a Type 5 but was re-classified at the originator's request. Still under investigation.

Report of System Outages	The following Type 1 System outages have occurred since the last Status Meeting: LENS - 6 TAG – 2 CSOTS – 1 Details of each outage are posted on the Change Control Website at www.interconnection.bellsouth.com.
Release Management Status	The target date for Release 7.0 has changed. Release 7.0 will not be implemented on 7/01. Change Control will advise CLEC community of new target date as soon as it becomes available. Targeted features for Release 7.0: • EDI0812990001 – order xDSL unbundled electronically • TAG0812990002 – mechanize the SI process for xDSL loops • OSS011300_001 - LNA of G for LENS • CR0071 - LEO Sending ECCKT data on FOC/CN in absence of CLS or CLF • CR0073 - LEO should pull ported number & return on FOC/CN • CR0074 – TAG is requiring the End User Address in error for ReqTyp E ACT of C • CR0075 – LESOG is clarifying for 1MBFE in error • CR0084 – TAG 2.2.0.8 Security Exception Error Defect
Upcoming Meetings	The Change Review Meeting is scheduled for **Wednesday, June 28, 2000.** The Change Review Meeting package was distributed to CLECs **June 19, 2000.** The next Monthly Status call is scheduled for **July 26, 2000.** Conference bridge telephone number is **205/970-3743**, access code **4736.** Conference call is from 9:30 – 11:30 AM Eastern.
Issues – Interim Change Control Process	1) CSM submitting change requests on behalf of CLEC. Change Control is currently copying the CCCM on the Acknowledgment Notification. Should CCP continue with this process, or should CSM refer CLEC to CCCM? CLECs advised to continue with the process of copying the CCCM on the notifications if a request is submitted by a CSM on behalf of the CLEC. Account Teams should also be able to submit requests on behalf of CLECs. 2) Posting of CRs on the web – "2000 Change Requests" vs. "Implemented Change Requests". Cheryl Storey explained that the CRs on the web are placed in the "2000 Change Requests" section until they are implemented. Then they are moved to the "Implemented Change Requests" section of the web. CLECs were okay with this process. 3) Web – new "Updates" section. Steve Hancock advised that we have added an "Updates" section to the first page of the Change Control web site. This includes at a weeks glance of what changes/additions have been made to the web site. The section updated is reflected and there is a hyperlink to that section. 4) Web – sections password protected. The Release Schedule and Meeting Minutes have been password protected on the web site. The password will change quarterly. Change Control will send a notice out each quarter with the password information. 5) Trial of Interim CCP ends July 17, 2000 Valerie Cottingham mentioned that the trial period ends July 17. At the July monthly status meeting Change Control will be asking for a vote from the CLEC community to make the Interim process a final baselined document. Improvements will continue to be made as we move forward.

	The CLECs advised they would like to finalize the expedited feature process before we vote on the baselined CCP document. The plan is to meet mid-July to discuss the Expedited Feature process.
Action Items	1) Owner: BellSouth (OPEN) BellSouth developing verbiage for Interim CCP guide regarding maintaining two issues (versions) at all times. Verbiage will be presented to CLECs for input. 2) Owner: BellSouth (OPEN) Expedited Feature process. BellSouth will conduct conference call with CLECs mid-July to discuss/finalize expedited feature process. 3) Owner: BellSouth (OPEN) BST to investigate the communication of the test window for when new releases are implemented. 4) Owner: BellSouth (OPEN) Change Control to coordinate conference call with BST and interested CLECs regarding ordering loops/EELS via the ASR21. 6) Owner: BellSouth (OPEN) Change Control to provide information to the CLEC community regarding the conversion spreadsheet available to convert access EELS to UNE EELS. 7) Owner: BellSouth (OPEN) Change Control to provide information on how BST is going to handle LSR0623990001-redirection of UNE LSRs in the LCSC. 8) Owner: BellSouth (OPEN) Change Control to confirm if the ordering tracking information for CR0040 would be real-time. 9) Owner: BellSouth (OPEN) Change Control to check with Renae Stewart on CR0080 to see if this change has been implemented. 10) Owner: BellSouth (OPEN) Change Control to check for a CR submitted by AT&T on 6-19-00 regarding DFDT on FOC. 11) Owner: BellSouth (OPEN) Change Control to provide beta testing information for XDSL to CLEC community.

Transmittal Cover Sheet for Pate Exhibit RMP-10

This sheet transmits the

August 23, 2000 CCP Monthly Status Call Minutes

which consists of 14 pages.

BELLSOUTH

Change Control Process
Monthly Status Meeting Minutes

DATE: August 23, 2000

MEETING: Monthly Status Call

PURPOSE: Review Status of Pending/Approved Change Requests

ATTENDEES

Lorraine Watson - WorldCom	Donna Graham – Mantiss	Valerie Cottingham, BST
Sandy Evans, Sprint	Malinda Saxon – Trivergent	Steve Hancock, BST
Jill Williamson – AT&T	Dave Genest – dsl.net	Cheryl Storey – BST
Woody Roe, Albion Connect	Mark Mecca – dsl.net	John Duffey, FL PSC
Steve Murray, Rhythms	Mike McLaughlin – dset	Brian Rutter, KPMG
Shamone Stapler, ITC-Deltacom	John Duffey, FL PSC	James Hunter, KPMG
Mubeen Saifullah, Nightfire	Brian Rutter, KPMG	Rick Woodhouse – KPMG
Phyllis Burt – Quintessent	Kim Gillette – Quintessent	

AGENDA

Agenda — Review status of pending/approved Change Requests (including defects), review current Release Management statuses and discuss Interim Change Control Process.

Opening

The BCCM opened the meeting and covered the items we were to accomplish on this conference call:

- Review of outstanding action items
- Review regulatory mandates
- Review status of pending/approved Change Requests
- Review status of pending defects
- Report of system outages
- Review current Release Management statuses
- Open Discussion – Interim Change Control Process
- New Issues/Action Items

Regulatory Mandates

CR0059 – Change TN Reservation Period to 45 days (pre-ordering functionality)
FCC Docket # 99200
Order # FCC00-104
CR0059 was not included in Release 7.0. The deadline for compliance has been extended until December 2000. Target date for implementation is 4Q00.

Outstanding Action Items

Outstanding Action Items from 7/26/00 Monthly Status call:

1. Owner: BellSouth (OPEN)
Finalize Expedited Feature Process
Status: To be discussed during today's meeting.

2. Owner: AT&T & WorldCom (OPEN)
Advise Change Control on how they would like to pursue UNE via ASR21 change request.
Status: AT&T (Jill) advised to leave this change request open.

3. Owner: BellSouth (CLOSED)
CR0040 – Order Tracking Request – provide additional clarification on LNP limitations.
Status: Information provided to originator on 8/7/00 for review and feedback. AT&T (Jill) advised responses were okay. No additional questions as this time.

4. Owner: BellSouth (CLOSED)
Update Release Schedule on CCP Web site and information on the standardization of the releases.
Status: 2000 Release Schedule provided to CLEC community on 8/16/00 and posted to the CCP web site. BST normally has 2 to 3 major releases a year (January, June-July and November timeframes). Point releases are scheduled as needed.

5. Owner: BellSouth (CLOSED)
Provide requirements to CLECs for CR0092 – DFDT & CHC Defect Request
Status: BellSouth provided business rules to CLECs on 8/1/00.

6. Owner: BellSouth (OPEN)
Investigate if CLECs can submit a list to the LCSC re: 411 drops.
Status: CLECs can call the LCSC and ask to speak with Manager to make arrangements. Jill (AT&T) to provide examples of LNP w/listing. Jill questioned if there will be a standard process for 411 drops. BST to investigate further.

7. Owner: BellSouth (CLOSED)
Address the inclusion of other BST ordering documentation in the 30-day or more advance notice

	(i.e., EDI Specifications). ***Status***: EDI Specifications and Pre-ordering business rules will be included in the 30-day advance notice. Currently the TAG API Reference Guide cannot commit to the 30-day advance notice. The TAG API Reference Guide provides the technical specs for building the code. The TAG API reference guide is generated as the code is created. If last minute changes are made, the changes must also be made in the guide. 8. Owner: BellSouth (CLOSED) Retirement of Interfaces. CLECs request that Change Control provide the notification to give them the opportunity to provide input. ***Status***: BellSouth will have all retirement of interface notification come through Change Control. Version 1.6 of Interim CCP has been updated. 9. Owner: BellSouth (CLOSED) Create a "Cancelled" category on the CCP web site to archive cancelled requests. ***Status:*** Category has been added and appropriate cancelled change requests have been moved. 10. Owner: BellSouth (OPEN) Investigate search/sort capability for CCP web site. ***Status***: Currently BellSouth is investigating the options available for the CCP site and will be tentatively targeting this enhancement for the end of September. 11. Owner: CLEC Community (OPEN) Review CR0095 – ECTA Attribute Validation and provide feedback to Change Control. ***Status***: AT&T (Jill) advised this is working fine as it is today. Will leave CR open for any additional comments from other CLECs.
New Change Requests (Types 2-5)	ORD030200_001 – UNE via ASR21 ***Status***: AT&T (Jill) advised to leave this CR open. ORD032700_001 – Post-FOC Clarification ***Status:*** Conference call held 8/10/00 with originator and BST SME to discuss options. It was determined that the pending pre-order CR TAG0812990001 (provide CFA information, NC/NCI codes) is a possible solution. If CR TAG0812990001 cannot be included with Release 8.0, Change Control will provide a date on when it can be worked. CR0012 – TAFI Functionality via ECTA Interface ***Status***: AT&T advised to leave this request open to continue discussions with BellSouth. CR0018 – USOC Segmentation ***Status:*** AT&T (Jill) advised this request could be closed. They may re-open at a later time. CR0033 – EDI Multiple ReqTyp Enhancement ***Status:*** Provided BST response on 8/4/00 to originator for review and feedback. Multiple REQTYPEs (AB/BB) cannot be supported via EDI due to system restrictions as well as OBF Guidelines. However, we understand that this is being allowed today on manually submitted LSRs. This is a training issue that will be addressed with the centers. We will also work jointly with the Account Teams and CSMs in educating the CLECs that for requests types similar to the example submitted (one LSR with a Loop w/NP and a Loop Service page) it would benefit CLECs, as well

as the centers, in processing LSRS if this was sent as a REQTYPE BB with a Loops w/Number Portability Page.

CR0053 – CLEC Ordering Guide – LSOG 4
Status: Pending Clarification for recommendations on improvements to the BellSouth Business Rules-Local Ordering guide.

CR0065 – Add LENS 6.3 Tutorial
Status: Originator advised this CR could be placed on "HOLD" until future updates to LENS are completed. BST provided additional information for consideration to originator on 7-19-00 regarding a new LENS Web-based course. CLECs should be able to register for this course in the September timeframe.

CR0087 – "C" Order Process for UNE-P
Status: CR is currently being reviewed for acceptance regarding changing the internal process for the migration of Retail or Resale to UNE-P.

CR0091 – Add DFDT to the FOC
Status: BST response provided to originator 8/9/00. Currently in escalation process. BST is reconsidering response.

CR0093 – Electronic Change Notifications
Status: Being reviewed for acceptance.

CR0095 – ECTA – Attribute Validation
Status: Open for CLEC comments on whether this is a feature they would like to see implemented.

CR0096 – LENS Enhancement- Add New Listings
Status: Being reviewed for acceptance

CR0104 – LENS Large Account Inquiry
Status: Being reviewed for acceptance.

CR0105 – Drop the RES ID to Requirement for xDSL Order
Status: BST response provided to originator on 8/14/00 for review.

CR0106 – Delay Sunset of LSOG2 xDSL Ordering via Fax
Status: BST response provided to originator on 7/26/00 for review. Originator appeal on 7/26/00. BST response to appeal on 8/11/00. LSOG2 sunset period has been extended until 10/01/00.

CR0121 – Discrepancies in BellSouth Guidelines – CG-LSOR-002
Status: Reclassified as a Type 6 defect change request.

CR0127 – Provide Pending Service Order for CSR via TAG
Status: Being reviewed for acceptance.

CR0131 – Split Billing Requests
Status: Being reviewed for acceptance.

CR0132 – Fielded Completion Notifications

	Status: Being reviewed for acceptance. CR0133 – Migration of UNE-P Notifications ***Status***: Being reviewed for acceptance. CR0134 – TN Reservation Display of Switch CLLI ***Status***: Being reviewed for acceptance. CR0135 – Merging of Accounts ***Status***: Being reviewed for acceptance. CR0137 – Flow-Through Change Request ***Status:*** Being reviewed for acceptance. CR0138 – Fielded Completion Notice. ***Status***: Originator advised this CR could be canceled – duplicate of CR0132. CR0139 – TAG API Clarification to Cross Reference Pre-Order Business Rules ***Status***: Being reviewed for acceptance CR0140 – Update the Due Date Calculation Intervals in TAG to Match Products/Services Interval (Resale) ***Status***: Being reviewed for acceptance

Pending Change Requests	The following change requests were prioritized at the June 28, 2000 Change Review Meeting and are in "Candidate Request (RC)" status. • EDI0812990003 - 411 Drops • EDI0812990004 - One LSR to change the main account number on "J" REQTYP • EDI0812990005 - Handling of Remaining Lines when main account is migrating • TAG0812990001- Provide CFA and NC/NCI via TAG Pre-Order • EDI081290007 - Lift LEAN/LEATN restrictions • TAG0812990003- Parsed CSR • EDI121599001 - TN vs. RSAG validation • EDI02090001 - Electronically Order Routing to OS/DA • EDI030300_001 – BST Test Environment ***Status***: Test Environment is targeted for implementation 4Q00. • CR0002 - Pre-Order/Order Business Rule Discrepancies • CR0003 - RPON Business Rules and Error Messages ***Status***: Advance copy of RPON Business Rules published to CLEC community on 8/16/00. Rules were originally targeted for publishing in the 8/25/00 BBR-LO update and the 8/29/00 LEO-IG Vol 1 update. The publishing date for the BBR-LO has been delayed due to the number of changes. A Carrier Notification letter will be posted with the new publishing date. It is anticipated that the new publishing date will be the week of 8/28/00. • CR0014- LENS Screen Change on Change Orders • CR0015 – LENS – ACT of C – Change Basic Class of Service • CR0016 – Service Inquiry Enhancement for SL1, SL2, DS0, DS1 and ISDN loops • CR0020 – View Multiple CSRs Simultaneously • CR0029 – Partial Migration of UNE Loops (ReqTyp A) • CR0030 – UNE to UNE Migrations • CR0031 – Change Listing Account in LENS • CR0038 – TOS Field on LSR ReqTyp J (TCIF 9) • CR0040 – Order Tracking Request • CR0045 – LENS 6.3 Conversion As Is – Not Stripping Non-Resellable USOCs • CR0047 – Display Enhanced MemoryCall Access Number in LENS • CR0078 – Extended Loops via EDI • CR0085 – Web-based LSR The following change requests are in "Pending" status: • CR0068 – Pipe-cross USOC **Status**: CR originally submitted as a defect. The LNPGW is responding to the LSR based on what is populated on the CSR. LNPGW to implement feature to modify requirements. Target imp date TBD. • CR0088 – Unbundled Terminating Wire (UNTW) Service Requests via EDI ***Status***: CR to be prioritized at the September Change Review Meeting. CR0101 – Request EDI Pre-Ordering ***Status***: CR to be prioritized at the September Change Review Meeting. CR0113 – LENS Inquiry – View Customer Record ***Status***: CR to be prioritized at the September Change Review Meeting.

	CR0117 – Update Issue 7 Map Due Date Calculation Tables w/information from BST Products & Intervals Guide. ***Status***: CR to be prioritized at the September Change Review Meeting.
Scheduled **Change Requests**	The following Change Requests are scheduled for upcoming releases: • **LSR0623990001 Redirection of UNE LSRs in the LCSC – Targeted for 8/27/00** • **CR0059 – Change TN Reservation Period – Targeted for 4Q00** • **CR0077 Subscription Version Cancellations – Targeted for 8/27/00** • **CR0092 – DFDT & CHC Defect Request – Targeted for 8/27/00 (EDI only)** • **CR0102 – NUM=TELNO=ACCT is Final Reject – Targeted for Rel 7.1 – 9/16/00** • **CR0109 – GA 912/229/478 NPA Splits – Targeted for Rel 7.2 10/14/00** • **CR0112 – Conversion As-Is ACT W Defect – Targeted for Rel. 7.1 – 9-16-00** • **CR0115 – Partial Pre-Order Query Due Date Calculation – Targeted for Rel 7.1 9/16/00** • **CR0116 – Premise Visit Indicator – Targeted for Rel 7.1 9/16/00** • **CR0118 – Remove Housenumprefix for TAG API 2.2.0.10 – Targeted for Rel. 7.1 9/16/00**

Implemented Change Requests	• EDI0812990001 Electronic ordering for unbundled XDSL loops – Beta testing 7/29/00 • TAG0812990002 DSL Capability – Beta testing 7/29/00 • OSS011300_001 LNA of G for LENS – Rel 7.0 8/12/00 (bus rules to be posted 8/25) • CR0062 Open REQTYP P/2nd TOS of E to Identify Centrex Services (manual) – 7/18/00 • CR0067 Call Return Invalid with Class of Service USOC UEPRX – Imp. 6/2/00 • CR0071 ECCKT data on FOC/CN with CLS or CLF – Rel 7.0 8/12/00 • CR0075 LESOG is clarifying for 1MBFE in error – Rel 7.0 8/12/00 • CR0076-LESOG is failing to generate port side of order when adding line – Rel 7.0 8/12/00 • CR0084 – TAG 2.2.0.8 Security Exception Error Defect – Imp. 6/20/00 • CR0090 – EDI/TAG LSR Auto-Clarify – Imp 7/9/00 • CR0119 – LESOG Auto clarifying NUM=TELNO-TN not in CRIS – Rel 7.0 8/12/00 • CR0120 – SOCS RT60 Invalid NPA NXX for Routing SUB 001 – Rel. 7.0 8/12/00 • CR0124 – LESOG to Cancel N & D if unsuccessful in generating both – Rel 7.0 8/12/00. • CR0125 – Receiving error message when placing order to add VCA & RJ11C in LENS – Release
Canceled Change Requests	The following change requests were canceled between July 26 – August 22: CR0046 – EDI Reject Process Modification CR0051 – LENS 6.3 – Expand Service Details for Floating FIDS CR0052 – WSOP Field Requirements Regarding EDI Type Orders CR0072 – LEO should pull BAN1 from Svc Order & Return on the FOC/CN CR0097 – LENS defect CR0114 – TN Reservation Defect CR0138 – Fielded Completion Notice
Defect Change Requests (Type 6)	The following defect change requests statuses are provided: • CR0008 – YPQTY-WPQTY (Iss 7) ReqType –E Reject Code must be 2 numerics – (Deltacom) ***Status:*** Open – Currently under appeal. • CR0013 – Date Sent/Century Defect (EDI) – (Nextlink) ***Status:*** Open – Validation response provided on 4-20. Waiting on originator to authorize closure. • CR0023 – OSS'99 Ordering Guidelines – (AT&T) ***Status:*** Open – Validation response provided on 5-3-00. AT&T has requested that this remain open until all guidelines have been updated. • CR0024 – Hunt Group Defect on a Separate CSR – (Adelphia) ***Status:*** Open – Validated as a defect and waiting on originator to authorize closure. • CR0039 – FOC Not Populating Order number on Port Order – (BST on behalf of Albion Connect) ***Status:*** Open – Determined to not be a defect. Waiting on originator to authorize closure. • CR0049 – LENS TNs for each PON on bulk order (BST)

Status: Open – Pending clarification.

- CR0050 – LENS 6.3 - # of Directories for white & yellow (BST)

Status: Determined to not be a defect, but will be entered as a feature to be targeted in a future release.

- CR0066 – Invalid USOC for Basic Class of SVC Format – CREX7/TN – (AT&T)

Status: Open – Validated as a documentation defect. Provided a work aid on 8-10 and will be providing additional information on when the documentation will be updated.

- CR0070 – Call Forwarding USOC Defect (AT&T)

Status: Open - BellSouth determined this not to be a defect. The USOC populated is not valid with the FID provided. The USOC GCE is call forwarding busy line, the CFND FID with RCYC is for call forwarding don't answer. Waiting on CLEC to inform when request can be closed.

- CR0073 – LEO should pull Ported number & return on FOC/CN (BST)

Status: Determined to be a defect and will be corrected in a future release TBD.

- CR0074 – TAG is requiring the end user address in error for ReqTyp E: Act of C (BST)

Status: Determined to be a defect and is targeted for a future release TBD.

- CR0079 - TAG IS REQUIRING "INIT" (BellSouth)

Status: Open – BellSouth determine that this request is not a defect. The system works per requirements. Originator has appealed the validation response.

- CR0080 - LESOG is failing to issue Port Loop Combo accurately (BellSouth)

Status: Verified - Electronic System Support (ESS) has determined that this is a defect and will be corrected in a future release.

- CR0081 - LESOG is populating an incorrect due date interval on SL1; ACT of A; (ISSUE 9) (BellSouth)

Status: Open – BellSouth is has determined that this is a defect. LSOG is not establishing the Standard Due date intervals as five business days per requirements. The fix is targeted for a future implementation date.

- CR0082 – LEO IS FAILING TO EDIT FOR LOCQTY (BellSouth)

Status: Open – BellSouth requested further clarification from originator.

- CR0098 – Re-Calculate Due Date Intervals – (BellSouth)

Status: Open – BellSouth has determined that this is not a defect, however additional testing is being performed.

- CR0099 - ORDER MA'D AND SERVICE ORDER INFO DELETED – (BellSouth)

Status: Open – BellSouth has determined that this is not a defect, however the decision is being made as to whether this will become a feature.

- CR0100 – TAG is failing to accurately calculate due dates on deny and restore (BST)

Status: Determined to not be a defect, however a feature will be opened targeted for a future release.

- CR0107 – Documentation Defect – CIC (AT&T)

Status: Open – Still under investigation. Once clarified, the necessary update to the verbiage for the CIC field will be input and posted to the Web by no later than 8-31-00.

- CR0108 – Listings over the number of 2 are not shown on LSR or order (BST)

Status: BellSouth determined that this is a defect and is being targeted for a future release TBD. Manual intervention is recommended.

- CR0110 – LESOG not populating ZNEA & ZNHC on ACT of N or C (BST)

Status: BellSouth determined that this is not a defect, but recommended that a Feature be opened. This feature will be targeted for a future release TBD.

- CR0123 – LENS Application Enhancement – (Gulf Coast Communication)

Status: BellSouth determined that this is not a defect and is waiting on the originator to authorize closure.

- CR0126 – LESOG should pull the correct CFN number for enhanced MMC – (BST)

Status: BellSouth determined that this is a defect and will be corrected in a future release TBD.

- CR0129 – LESOG failing to apply ZRTI to orders – (BST)

Status: BellSouth determined that this is a defect and will be corrected in a future release TBD.

- CR0130 – LESOG not responding to "C" order adding line & features on Resale Accounts – (BST)

Status: BellSouth determined that this is not a defect and is waiting on the originator to authorize closure.

- CR0136 – Address Validating in LENS but not in TAG on old RSAG history – (BST)

Status: BellSouth determined that this is a defect and will be targeted for a future release TBD.

Report of System Outages	The following Type 1 System outages have occurred since the last Status Meeting: LENS – 6 EDI – 1 TAG – 3 CSOTS - 1 Details of each outage are posted on the Change Control Website at www.interconnection.bellsouth.com.
Release Management Status	The target date for LNP Release 5.1 is 8/27/00: • LSR0623990001 – Redirection of UNE LSRs in the LCSC • CR0077 – Subscription Version Cancellation • CR0092 – DFDT & CHC (for EDI only) The target date for Release 7.1 is 9/16/00 (date may change to 9/30/00 or 10/7/00 due to Line Sharing mandate): • CR0112 – Conversion As-Is ACT W Defect • CR0115 – Partial Pre-Order Query DDC • CR0116 – Premise Visit Indicator • CR0118 – Remove HOUSENUMPREFIX from TAG The target date for Release 7.2 is 10/14/00: • CR0109 – GA 912/229/478 NPA Split The target date for Release 8.0 is 11/11/00: The proposed scope for Release 8.0 should be complete within two weeks. A conference call will be scheduled to review.
Upcoming Meetings	Release 8.0-scope conference call is targeted within the next two weeks. The Change Review Meeting (prioritization) is scheduled for **Wednesday, September 27, 2000.** Meeting details were distributed on 8-16-00. This will be a face-to-face meeting in Atlanta, GA. The meeting will be held at the BellSouth Conference Center, 1447 NE Expressway, Atlanta, GA 30329. The meeting will begin at 8:30 AM Eastern and last to approximately 3:00 PM. Please R.S.V.P. with your number of attendees to Change.Control@bridge.bellsouth.com by no later than **9/13/00**. Change Requests must be accepted and in "Pending" status by **9/18/00** to be placed on the Change Review Meeting agenda for prioritization. The Change Review Meeting package will be distributed to CLEC community between **9/18-9/20**.
Issues – Interim Change Control Process	1) Changes to CR form – adding the Change Control email address BellSouth has updated the RF1870 (Change Request Form) with the Change Control email address. 2) Section 10 - Testing Environment Change Control recommended the following changes to the Testing Environment section of the

Interim CCP document:

- 4th paragraph, indicate that the testing guidelines are located on the BellSouth web site and provide web site address for EDI and TAG.
- Remove last paragraph regarding BellSouth currently investigating and pricing the feasibility of a non-production testing environment since this request is targeted for 4Q00 implementation.

The above was acceptable to the CLEC community.

3) Defect/Expedited Feature process was reviewed/discussed. Four major changes have been made to the draft: (1) Included expedites as Type 6 Change Request, (2) Expanded the defect definition (3) Added High, Medium and Low Impact Levels and (4) Added intervals for implementing the High Impact levels.

Everyone agreed to make the following changes to the draft:

- Include documentation defects in the defect definition.
- Add "no electronic" workaround to High Impact definition
- Step 3 – add decision step if CR is validated as a High Impact
- Step 3 – 5th bullet – change verbiage to match new defect definition
- Initial Release Notification would be 30-day advance notice. If changes are made to the scope, a revised notification letter will be posted 2 weeks prior to implementation date. If additional changes are made to the scope of the release within the 2-week period, a post-release notification letter will be posted.

Change Control agreed to address the following concerns raised by the CLEC community:

- Step 4 – time interval for workaround
- Time interval for implementing a High Impact expedite
- Providing a patch code (as a workaround) for expedites
- Process and M&P changes included in 5 business day advance notification

Note: The "draft" Defect/Expedite Feature process will be incorporated into the Change Control Process document and will remain a "draft" as BellSouth works to address the issues raised by the CLECs.

4) Courtesy copies Carrier Notification Letters

BellSouth explained that BST business decisions that are made due to business drivers for efficiencies do not flow through Change Control. This information is posted in the form of Carrier Notification Letters and posted to the Interconnection Web site. Some examples of these Carrier Notifications were given:

- New LCSC Fax Numbers
- Manually submitting LSOG 4 Forms
- Methods for submitting manual Local Service Requests (LSRs)
- Packaging features/services offered at a discounted rate (BellSouth Essentials)
- Updates to the LEO-IG

BellSouth started sending courtesy copies of these types of notifications over the last week. The intent is to provide information to the CLEC community prior to it being posted to the Web site.

The CLECs expressed their approval and agreed that continuing to receive this information

Via email through Change Control would be beneficial.

5) Vote on baseline CCP document.
Valerie Cottingham explained the joint efforts in achieving the progress we have with the Interim CCP. She mentioned a few of the major improvements that have been made to the process since the discussions, with a few CLECs, began in February 2000. Some of the enhancements that were mentioned are:

- CCP now incorporates defects/expanded the defect definition
- Notify CLECs of new CRs and other statuses by email and through the new CCP Website
- Have monthly status meetings with SME participation, as needed. Will also include SME participation at Change Review Meetings, as needed.
- Formal escalation process
- Incorporated Introduction/Retirement of Interfaces; will allow input from CLECs

Valerie emphasized that the Interim process is a *working* document, not a final document. BellSouth is committed to working with the CLEC community to address their needs and Concerns. She asked for a consensus that the Interim process be accepted as the new Baseline for building upon. The results of the vote are as follows:

Woody Roe, Albion-Connect – Yes
Lorraine Watson – Worldcom – Yes
Shamone Stapler – ITC/Deltacom – Yes
Mubeen Saifullah, Nightfire – Yes
Donna Graham – Mantiss – Yes
Malinda Saxon – Trivergent – Yes

Jill Williamson – AT&T – No
Reasons:
1) AT&T does not agree with the time intervals
2) AT&T does not think that BST should reject Change Requests
3) The defect/expedite process should be finalized

Sandy Evans – Sprint – No
Reasons:
1) Sprint does not agree with the intervals
2) Sprint does not agree with the length of time that some change requests have been in the process.

Phyllis Burt – Quintessent – No
Reason:
1) Quintessent does not agree with the intervals
BellSouth requested examples from Quintessent dealing with not meeting intervals.

Since the vote was 6 – 3 in favor with 1 abstention from dsl.net, Change Control will make this document the new "baseline" document for the Change Control Process.

Action Items	1. Investigate if there will be a standard process for handling 411 drops. (BellSouth) 2. Add CR0110 to CR Log. (BellSouth) 3. Send Steve Murray a copy of the CR Log and Defect/Expedite draft process that was discussed on the call. (BellSouth) 4. Investigate time intervals for defect/expedite workaround. (BellSouth) 5. Investigate time interval for implementing a High Impact expedite. (BellSouth) 6. Determine if BellSouth can provide a code "patch" (as a workaround) for expedites until a permanent fix is implemented. (BellSouth) 7. Determine if Process and M&P changes are included in the posting of notifications of documentation updates (non-system changes) 5 days prior to the documentation posting date. (BellSouth)

Transmittal Cover Sheet for Pate Exhibit RMP-11

This sheet transmits the

July 26, 2000 CCP Monthly Status Call Minutes

which consists of 13 pages.

BELLSOUTH

Change Control Process
Monthly Status Meeting Minutes

DATE: July 26, 2000

MEETING: Monthly Status Call

PURPOSE: Review Status of Pending/Approved Change Requests

ATTENDEES

Tyra Colbert, WorldCom	Steve Murray, Rhythms	Valerie Cottingham, BST
Sandy Evans, Sprint	Brian Rutter, KMPG	James Hunter, KPMG
Annette Cook, e.spire	Steve Hancock, BST	Shamone Stapler, ITC-DeltaCom
Linda Tate – BST	Cheryl Storey, BST	Jill Williamson, AT&T
Carol Harrison, Impower	Carl Vincent, FL PSC	Kevin McAllorum, AT&T
Peggy Rehm, Nightfire	John Duffey, FL PSC	Mubeen Saifullah, Nightfire
Brenda Files, BST	Paul Winehart, e.spire	Phyllis Burt, Quintessent
Woody Roe, Albion Connect	Yvette Brown, e.spire	Mickey Dossey, Quintessent
Lorraine Watson - WorldCom	Kim Gillette - Quintessent	Donna Graham, Mantiss
		Rick Woodhouse,KPMG

AGENDA

Agenda — Review status of pending/approved Change Requests (including defects), review current Release Management statuses and discuss Interim Change Control Process.

Opening

The BCCM opened the meeting and covered the items we were to accomplish on this conference call:

- Review of outstanding action items
- Review regulatory mandates
- Review status of pending/approved Change Requests
- Review status of pending defects
- Report of system outages
- Review current Release Management statuses
- Open Discussion – Interim Change Control Process
- New Issues/Action Items

Release 7.0 Update

Linda Tate, Director of IT Solutions Development and Implementation, advised that due to coding problems, Release 7.0 would not be fully implemented on July 29, 2000. We currently do not have a new date for Release 7.0. The only functionality that will be provided on July 29, 2000 is the xDSL beta testing.

Additional information, including training, will be provided to the CLECs that will participate in the xDSL beta testing. xDSL business rules are currently being finalized. The target date for posting xDSL business rules is 8/14/00.

Non-Production Test Environment

Linda Tate advised that BellSouth is in the process of implementing a CLEC test environment that can be used to test code before rolling out into production. BellSouth is in the process of ordering hardware. The test environment is targeted for implementation 4Q00. BellSouth plans to work with the CLEC community on the requirements and implementation.

Regulatory Mandates

CR0059 – Change TN Reservation Period to 45 days (pre-ordering functionality)
FCC Docket # 99200
Order # FCC00-104
Posted 6-16-00
Order becomes effective July 17, 2000
Targeted for Release 7.0 – Implementation date TBD

Outstanding Action Items

Outstanding Action Items from 6/26/00 Monthly Status call:

1) Owner: BellSouth (CLOSED)
Worldcom requested that BellSouth include verbiage in the Interim CCP regarding maintaining two issues (versions) at all times.
Status: Verbiage included as Appendix D – to be reviewed during today's discussion.

2) Owner: BellSouth (OPEN)
Expedited Feature Process.
Status: Conference call held 7-17-00. CLECs requested impact levels and ranges of time to implement expedites. BST currently addressing CLEC requests. Another conference call will be scheduled within the next two weeks to continue discussions.

3) Owner: BellSouth (CLOSED)
CLECs are requesting that the communication of the test window for testing new releases be included in the Change Control Process.
Status: In the current environment, the test window begins when the release goes into production because BellSouth is conducting System and User Acceptance testing up to the release

implementation date. With the new planned non-production test environment, Change Control will be able to communicate the test windows to the CLEC community.

4) Owner: BellSouth (OPEN)
Change Control to coordinate conference call with BST and interested CLECs regarding ordering loops/EELS via the ASR21.
Status: The appropriate SME will be available in the August timeframe to discuss further. BellSouth has addressed this request internally. The BST Policy decision remains the same. BST Policy decision is that the LSR is the ordering form for UNE loops/EELS. The exception is for bulk conversion of existing access EELS to UNE EELS. There is a spreadsheet that can be obtained from your Account Team to be completed by the CLEC for the conversions. BellSouth is supporting the standards. BellSouth is trying to keep costs down for both CLECs and BST. An option is the BFR.

5) Owner: BellSouth (CLOSED)
Change Control to provide information to the CLEC community regarding the conversion spreadsheet available to convert access EELS to UNE EELS.
Status: Conversion spreadsheet can be obtained from your Account Team.

6) Owner: BellSouth (CLOSED)
Change Control to provide information on how BST is going to handle LSR0623990001-Redirection of UNE LSRs in the LCSC.
Status: Updated CR provided to CLECs 6-30-00 with explanation. This will be an internal feature in the LNPGW for the LCSC to sort/route UNE LSRs. No process change for the CLECs.

7) Owner: BellSouth (CLOSED)
Change Control to check with Renae Stewart on CR0080 to see if this change has been implemented.
Status: Change Implemented. System working properly.

8) Owner: BellSouth (CLOSED)
Change Control to check for a CR submitted by AT&T on 6-19-00 regarding DFDT on FOC.
Status: Change Control did not receive CR, requested that AT&T submit again. AT&T did submit again on 6-26-00.

9) Owner: BellSouth (CLOSED)
Change Control to provide beta testing information for XDSL to CLEC community.
Status: Carrier Notification Letter posted 6-29-00 for Release 7.0 indicates that CLECs must negotiate a CLEC Beta Testing Agreement. This should be coordinated through your Account Team.

<u>Outstanding Action Items from 6/28/00 Change Review Meeting:</u>

1) Owner: BellSouth (CLOSED)
Provide draft Letter of Intent to CLECs for input. Letter of Intent will include timeframes that indicate CLEC anticipated use of the interface.
Status: Draft LOI provided 7-21-00 for discussion during today's meeting.

2) Owner: BellSouth (CLOSED)
Determine if BellSouth will provide typewritten orders to CLECs for win backs.
Status: The Regional Trapper Center will type all Local Service Requests (LSRs).

3) Owner: BellSouth (CLOSED)
Post a Master document on Web of what interfaces CLECs can vote on.
Status: Posted on CCP Web site under the "Processes/Documents/BST Mailing List"

4) Owner: BellSouth (OPEN)
CR0040-Order Tracking Request. Provide additional information on LNP limitations.
Status: Non-LNP tracking information will be real time. LNP information will be non-real time. Currently the LNP architecture is not designed to accommodate real time queries regarding the status of a service order and the location of an LSR with respect to the hand-off between systems. We are currently making architecture changes to the LNP system, which in time may allow a real time query to occur. AT&T (Jill) submitted additional questions on 7-24, which are currently being addressed by BST. Responses to these questions should provide clarification regarding the LNP issue.

5) Owner: BellSouth (CLOSED)
CR0002-Pre-order/Order Field Discrepancies-CLEC concerns on the handling of this request.
Status: The Release Management Team was made aware of CLEC concerns with the field discrepancies and advised this effort is being reviewed for upcoming releases. The work effort around this feature is large due to the number of fields affected. Additional information should be available at our August Release Package Meeting.

6) Owner: BellSouth (CLOSED)
Check on status of Sprint's document addressing discrepancies in the BellSouth Business Rules-Local Ordering Guide.
Status: Response has been provided to Sprint addressing discrepancies.

7) Owner: BellSouth (OPEN)
Determine if BST could provide draft documentation to CLECs prior to release.
Status: CLECs were advised that BellSouth couldn't provide draft documentation prior to releases.

8) Owner: BellSouth (OPEN)
EDI0812990003 – CLECs requested better understanding of why 411 drops are occurring.
Status: If a CLEC's end user listing is dropped from Directory Assistance, the CLEC should call the LCSC. If BellSouth is at fault, no additional LSR is required from the CLEC. The listing is corrected as soon as possible. If a CLEC error is the cause, an LSR is required.

Jill (AT&T) questioned if a list could be submitted to the LCSC in lieu of calling. Change Control will address internally and provide response. Jill advised she would like to leave this request in "Pending" status. Change Control will continue discussion with Jill regarding this issue.

9) Owner: BellSouth (OPEN)
Determine how high priority CRs that have not been scheduled will be handled.
Status:It was suggested that high priority CRs that have not been scheduled be ranked two (2) times before trying to get implemented.

New Change Requests (Types 2-5)	ORD030200_001 – UNE via ASR21 ***Status***: See Action Items. Jill (AT&T) and Tyra (WorldCom) will advise Change Control how they would like to pursue with this request. ORD032700_001 – Post-FOC Clarification ***Status:*** Conference call to be scheduled in August to discuss further.

CR0012 – TAFI Functionality via ECTA Interface
Status: AT&T advised to leave this request open to continue discussions with BellSouth.

CR0018 – USOC Segmentation
Status: AT&T reviewing feedback from BST.

CR0028 – Document LSOG 2 & 4 Differences
Status: Provided BST response to originator 6-8-00 for review and feedback. Shamone (ITC Deltacom) advised this request could be cancelled.

CR0033 – EDI Multiple ReqTyp Enhancement
Status: Pending Clarification for examples of what is submitted manually today.

CR0044 – LENS Calculate Due Date Enhancement
Status: Cancelled by BST.

CR0046 – EDI Reject Process Modification
Status: Completed 2nd level escalation. Waiting to hear from originator if request can be cancelled or if 3rd level escalation would be pursued.

CR0051 – LENS 6.3 – Expand Service Details field for Floating FIDS
Status: Submitted as a potential defect. Reclassified as a feature. Being reviewed for acceptance.

CR0052 – WSOP Field Requirements
Status – Provided BST response to originator 6-9-00 for review and feedback. Waiting to hear from originator if request can be cancelled or if additional information is needed.

CR0053 – CLEC Ordering Guide – LSOG 4
Status: Pending Clarification for recommendations on improvements to the BellSouth Business Rules-Local Ordering guide.

CR0065 – Add LENS 6.3 Tutorial
Status: Originator advised this CR could be placed on "HOLD" until future updates to LENS are completed. BST provided additional information for consideration to originator on 7-19-00. LENS is developing a new Web-based course. CLECs should be able to register for this course in the September timeframe.

CR0087 – "C" Order Process for UNE-P
Status: CR originally submitted as a potential defect. A defect was corrected with Release 6.4 on June 17, 2000 with the "D" and "N" orders. CR is currently being reviewed for acceptance regarding changing the internal process for the migration of Retail or Resale to UNE-P.

CR0091 – Add DFDT to the FOC
Status: Being reviewed for acceptance.

CR0093 – Electronic Change Notifications
Status: Being reviewed for acceptance.

CR0095 – ECTA – Attribute Validation
Status: Recent 3rd party audits of EC-TA interface suggests that BellSouth should consider implementing attribute validation on every attribute sent by the Manager (CLEC). CLECs requested additional time to review this request internally and will provide Change Control feedback.

	CR0096 – LENS Enhancement- Add New Listings **Status**: Being reviewed for acceptance CR0101 – EDI Pre-ordering Functionality **Status**: Being reviewed for acceptance. CR0104 – LENS Large Account Inquiry **Status**: Being reviewed for acceptance. CR0105 – Drop the RES ID to Requirement for xDSL Order **Status**: Being reviewed for acceptance CR0106 – Delay Sunset of LSOG2xDSL Ordering via Fax **Status**: Being reviewed for acceptance

Pending Change Requests	The following change requests were prioritized at the June 28, 2000 Change Review Meeting and are in "Candidate Request (RC)" status. • EDI0812990003 - 411 Drops • EDI0812990004 - One LSR to change the main account number on "J" REQTYP • EDI0812990005 - Handling of Remaining Lines when main account is migrating • TAG0812990001- Provide CFA and NC/NCI via TAG Pre-Order • EDI081290007 - Lift LEAN/LEATN restrictions • TAG0812990003- Parsed CSR • EDI121599001 - TN vs. RSAG validation • EDI02090001 - Electronically Order Routing to OS/DA • EDI030300_001 – BST Test Environment • CR0002 - Pre-Order/Order Business Rule Discrepancies • CR0003 - RPON Business Rules and Error Messages • CR0014- LENS Screen Change on Change Orders • CR0015 – LENS – ACT of C – Change Basic Class of Service • CR0016 – Service Inquiry Enhancement for SL1, SL2, DS0, DS1 and ISDN loops • CR0020 – View Multiple CSRs Simultaneously • CR0029 – Partial Migration of UNE Loops (ReqTyp A) • CR0030 – UNE to UNE Migrations • CR0031 – Change Listing Account in LENS • CR0038 – TOS Field on LSR ReqTyp J (TCIF 9) • CR0042 – Open IWBAN Field on EU Form • CR0045 – LENS 6.3 Conversion As Is – Not Stripping Non-Resellable USOCs • CR0047 – Display Enhanced MemoryCall Access Number in LENS • CR0062 – Open ReqTyp P/2nd TOS of E to identify Centrex Services (manual) • CR0078 – Extended Loops via EDI • CR0085 – Web-based LSR The following change requests are in "Pending" status: • CR0068 – Pipe-cross USOC **Status**: CR originally submitted as a defect. The LNPGW is responding to the LSR based on what is populated on the CSR. LNPGW to implement feature to modify requirements. Target imp date TBD. • CR0088 – Unbundled Terminating Wire (UNTW) Service Requests via EDI ***Status***: CR to be prioritized at the next Change Review Meeting (tentatively scheduled for September timeframe).

Scheduled Change Requests	The following Change Requests are scheduled for upcoming releases: • **EDI0812990001 Electronic ordering for unbundled XDSL loops – Beta testing 7/29/00** • **TAG0812990002 DSL Capability – Beta testing 7/29/00** • **OSS011300_001 LNA of G for LENS – Rel 7.0 (date TBD)** • **CR0059 – Change TN Reservation period to 45 days – Rel 7.0 (date TBD)** • **CR0066 – Invalid USOC for Basic Class of Svc Format (sch to be corrected in the Rate Database)** • **CR0071 ECCKT data on FOC/CN with CLS or CLF – Rel 7.0 (date TBD)** • **CR0075 LESOG is clarifying for 1MBFE in error – Rel 7.0 (date TBD)** • **CR0076-LESOG is failing to generate port side of order when adding line – Rel 7.0 (date TBD)** • **CR0077 Subscription Version Cancellations – Targeted for 8/27/00** • **LSR0623990001 Redirection of UNE LSRs in the LCSC – Targeted for 8/27/00** • **CR0092 – DFDT & CHC Defect Request – Targeted for 8/27/00**

Implemented Change Requests	• CR0022 – Issue 9 Flow Through Matrix – Implemented 6/30/00 • CR0067 - Call Return invalid with class of service USOC UEPRX • CR0089 – Reserving Telephone Numbers • CR0090 - EDI/TAG LSR Auto-Clarify – Implemented 7/9/00.
Canceled Change Requests	The following change requests were canceled between June 26 – July 26: EDI030200_001 – Modify Line Activities to Align with Industry Guidelines CR0027 – Display listing infor on FOC for Reqtyp CB (manual orders) CR0042 – Open IWBAN field on the EU form CR0043 – Conversion As-Is error – Invalid USOC CR0057 – Port/Loop Combo Conversion CR0058 – Fraud Management Process CR0063 – Memory Call Forwarding Number CR0069 – Reserving Telephone Numbers CR0083 – Customer Service Record Error Message CR0086 –EELs via ASR CR0094 - TAG6015VAL REFNUM= CFA FORMAT INVALID CR0103 – Disconnect of Port Loop Combo going into RECYCLE in Issue 9.13
New Defect Change Requests (Type 6)	The following defect change requests statuses are provided: • CR0070 – Call Forwarding USOC Defect (AT&T) ***Status:*** Open - BellSouth determined this not to be a defect. The USOC populated is not valid with the FID provided. The USOC GCE is call forwarding busy line, the CFND FID with RCYC is for call forwarding don't answer. Waiting on CLEC to inform when request can be closed. • CR0072 – LEO SHOULD PULL THE BAN1 FROM THE SERVICE ORDER AND SEND BACK ON THE FOC/CN (BellSouth) ***Status:*** Verified - This has been determined as a defect and has been targeted for a future release. • CR0079 - TAG IS REQUIRING "INIT" (BellSouth) ***Status:*** Open – BellSouth determine that this request is not a defect. The system works per requirements. Originator has appealed the validation response. • CR0080 - LESOG is failing to issue Port Loop Combo accurately (BellSouth) ***Status:*** Verified - Electronic System Support (ESS) has determined that this is a defect and will be corrected in a future release. • CR0081 - LESOG is populating an incorrect due date interval on SL1; ACT of A; (ISSUE 9) (BellSouth) ***Status:*** Open – BellSouth is has determined that this is a defect. LSOG is not establishing the Standard Due date intervals as five business days per requirements. The fix is targeted for a future implementation date. • CR0082 – LEO IS FAILING TO EDIT FOR LOCQTY (BellSouth) ***Status:*** Open – BellSouth requested further clarification from originator.

- CR0092 - DFDT/CHC Defect Request – (AT&T)

Status: Open – BellSouth has determined that this is not a defect as the LNP systems are working according to the baseline requirements, however CR 20089 is targeted for implementation on 8/27/2000. Until that time, it will be necessary for the CHC and DFDT to be populated on LSRs for SL2 loops when the NPT = D. Beginning July 17, all SL2 orders for Company Code 7125 will be updated to add the time specific billing. The DFDT from the LSR will be used on the service order as the desired cut time.

- CR0097 – LENS Defect – (AT&T)

Status: Open – BellSouth has determined that this is not a defect. BellSouth has proactively initiated a request to verify all AT&T LENS users have 0292 as an option on their LENS Main Menu for LENS 6.4. This should be complete by Tuesday, July 11th, 2000.

- CR0098 – Re-Calculate Due Date Intervals – (BellSouth)

Status: Open – BellSouth has determined that this is not a defect, however additional testing is being performed.

- CR0099 - ORDER MA'D AND SERVICE ORDER INFO DELETED – (BellSouth)

Status: Open – BellSouth has determined that this is not a defect, however the decision is being made as to whether this will become a feature.

- CR0102 - NUM = TELNO = ACCT is FINAL Reject – (Access One)

Status: BellSouth has determined that this is a defect and is being targeted for a future release TBD.

- CR0107 – Documentation Defect – CIC (AT&T)

Status: Open – Still under investigation.

Report of System Outages	The following Type 1 System outages have occurred since the last Status Meeting: LENS - 4 TAG – 1 Details of each outage are posted on the Change Control Website at www.interconnection.bellsouth.com.
Release Management Status	Functionality to be implemented 7/29/00: • EDI0812990001 – order xDSL unbundled electronically (beta testing) • TAG0812990002 – mechanize the SI process for xDSL loops (beta testing) Targeted for Release 7.0 (date TBD): • OSS011300_001 - LNA of G for LENS • CR0059 – TN Reservation Changed to 45 days • CR0071 - LEO Sending ECCKT data on FOC/CN in absence of CLS or CLF • CR0075 – LESOG is clarifying for 1MBFE in error • CR0076 – LESOG is failing to generate port side of order when adding line The target date for LNP Release 5.1 is 8/27/00: • LSR0623990001 – Redirection of UNE LSRs in the LCSC • CR0077 – Subscription Version Cancellation • CR0092 – DFDT & CHC
Upcoming Meetings	Target date for completing Step 7 – Internal Change Management Process is August 11, 2000. The next step is for BellSouth to present the proposed release package for Release 8.0 to the CLEC community for input. CLECs requested that the Release Package Meeting be held the week of August 14 (prefer August 14 or 15). Change Control will provide meeting logistics. A meeting to discuss the expedite process will be scheduled in August. Next prioritization meeting is tentatively scheduled for September. Release 9.0 is targeted for January, 2001. Change Control will provide additional details. The next Monthly Status call is scheduled for **August 23, 2000**. Conference bridge telephone number is **205/970-3743**, access code **4736.** Conference call is from 10:30 – 12:30 AM Eastern.
Issues – Interim Change Control Process	1) Review CLEC e-mail re: CCP issues. BellSouth is committed to providing SME support as needed. However, CLECs should provide Change Control two-week advance notice if they wish for SME participation on a particular CR in the upcoming Monthly Status meeting. 2) Review of Interim CCP document changes. The recommended changes (Version 1.6, dated July 20, 2000) of the Interim CCP were reviewed with the CLEC community. Summary of additional changes to the recommendations include: - Add testing phase to the verbiage regarding submittal and voting of CRs - Change Control to address the inclusion of other documentation that impacts placing an order (i.e., EDI Specifications) to the 30 day or more advance notice - Include verbiage regarding CLEC involvement when discussing alternatives/options for a change

	request (Step 3 – Types 2-5) - Add 4-30 day resolution interval to Defect Type 6 process flow - Add Type 6 escalation turnaround time – 3 days - Remove "Release Schedule Status Log Template" – Attachment C-6. CLECs advised the enhanced CR log that we now use includes the necessary information. 3) BellSouth asked the CLECs if a separate log for defects is needed? The CLECs advised that the current Change Request Log is adequate, however BellSouth should assure that workarounds are communicated and included in the notes section. 4) Suggestions on bringing closure to CRs that have been in "NEW" status for a period of time and Change Control has not heard from the originator. CLECs agreed that if we follow up with the originator two times and indicate that we need to hear from them within a specified timeframe and don't, the CR could be closed/canceled. 5) CLEC Input on CLEC Notification Letters. If LNP is implementing a release on the same weekend as the other Electronic Interfaces, but the functionality is independent of each other, would the CLECs like one Notification Letter or two letters (one for LNP, one for the other Electronic Interfaces). The CLECs advised two letters was fine. Our current process is one consolidated letter for when the functionality is related. Two separate letters for when the functionality is not related. 6) CLECs suggested that we archive "Canceled" and "Implemented" change requests once they have completed one cycle of the status meeting. Change Control agreed. 7) CLECs suggested that we shade the areas of the CR Log that will be discussed during the Monthly Status calls. Change Control agreed. 8) CLECs suggested that CCP e-mail and web post CRs when the BST response is provided to the originator for review. Currently, CCP emails the CLEC community & web posts a CR when the status of the CR changes. Change Control agreed. 9) BellSouth is committed to submitting documentation defects through the process.

Action Items	1. Owner: BellSouth (OPEN) Finalize Expedited Feature Process 2. Owner: AT&T & WorldCom (OPEN) Advise Change Control on how they would like to pursue UNE via ASR21 change request. 3. Owner: BellSouth (OPEN) CR0040 – Order Tracking Request – provide additional clarification on LNP limitations. 4. Owner: BellSouth (OPEN) Update Release Schedule on CCP Web site and information on the standardization of the releases. 5. Owner: BellSouth (OPEN) Provide requirements to CLECs for CR0092 – DFDT & CHC Defect Request 6. Owner: BellSouth (OPEN) Investigate if CLECs can submit a list to the LCSC re: 411 drops. 7. Owner: BellSouth (OPEN) Address the inclusion of other BST ordering documentation in the 30-day or more advance notice (i.e., EDI Specifications). 8. Owner: BellSouth (OPEN) Retirement of Interfaces. CLECs requests that Change Control provide the notification to give them the opportunity to provide input. 9. Owner: BellSouth (OPEN) Create a "Canceled" category on the CCP web site to archive cancelled requests. 10. Owner: BellSouth (OPEN) Investigate search/sort capability for CCP web site. 11. Owner: CLEC Community (OPEN) Review CR0095 – ECTA Attribute Validation and provide feedback to Change Control.

Transmittal Cover Sheet for Pate Exhibit RMP-12

This sheet transmits the

October 17, 2000 CCP Process Improvement Meeting Minutes

which consists of 8 pages.

BELLSOUTH

October 17, 2000

CCP Process Improvement Meeting
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
CCP PROCESS IMPROVEMENT	Steve Hancock – Change Control Team	10-18-00
BellSouth Conference Center		

Participants/Attendees

PARTICIPANT	COMPANY
Terrie Hudson	BST - NCS/CS
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Jill Williamson	AT&T
Bill Grant	Telcordia
Mike Young	Telcordia
Brian Rutter	KPMG
Kevin McCall	BST - NCS/CS
Kathy Rainwater	BST - NCS/CS
Bill Shoemaker	BST - NCS/CS
Steve Hancock	BST - CCP
John Duffey	FL - PSC
Woody Roe	Albion-Connect
Selange Roberts	espire
Phyllis Burt	Quintessent

PARTICIPANT	COMPANY
Rick Woodhouse	KPMG
Graham Watkins	KPMG
Shamone Stapler	ITC/Deltacom
Mary Conquest	ITC/Deltacom
Stephanie Smith	dset
Yvette Brown	espire
Rae Dupraw	Mpower
Sandy Evans	Sprint
Tyra Hush	Worldcom
Lorraine Watson	Worldcom
Steve Murray	Rhythms
Kim Gillette-Hoskins	Quintessent
James Hunter	KPMG
Ron Thompson	XO
Peggy Rehm	Nightfire

Meeting Information History

DATE	START TIME	END TIME
10/17/00	9:00 AM EDT	12 NOON EDT

MEETING PURPOSE

To better understand the CLEC's needs with regard to the Change Control Process.

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

BELLSOUTH

October 17, 2000

CCP Process Improvement Meeting
MEETING MINUTES

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Agenda Items	Discussion
. PROVIDE REVISION HISTORY FOR DOCUMENTATION UPDATES. Carrier Notification Letter needs to provide more details regarding the changes	Jill Williamson - (AT&T) requested that BST provide additional details in Carrier Notification Letters; all Business Rules/documentation changes need to flow through CCP. Valerie Cottingham (BST) explained that CCP has begun to send the revision summary prior to the documentation being posted to the web. Woody Roe - (Albion Connect) reiterated that anything (documentation) that is touched should go through the CCP process. All customer notification letters that announce documentation changes should reference a change request that has been submitted through CCP. Tyra Hush (Worldcom) stated that if customer notification letters have OSS impact, they should be discussed in CCP meetings. Kathy Rainwater - (BST) explained that BellSouth is currently looking at new software that will be used to facilitate documentation changes more easily. BellSouth's intent is to make these documents more "user friendly".
	ACTION ITEM (BELLSOUTH) - Revision History should be attached to associated Carrier Notification Letters.
2. Have BST SMEs available at the Monthly Status Meetings to discuss the specifics of the Carrier Notification Letters distributed by Change Control.	Steve Murray (Rhythms) emphasized that BellSouth should have someone at the meetings with the power to make commitments. Valerie Cottingham (BST) explained that CCP had provided SMEs at the last two (2) monthly status meetings as well as the 9-27 Change Review Meeting and would continue to support providing SMEs at meetings. Having the SME's in attendance greatly helped to expedite discussion and facilitate the meetings. The CLECs need to provide two (2) weeks notification for SME participation. Jill Williamson - (AT&T) stated that it was OK to give advance warning to allow time for SMEs to address an issue at a given meeting. Tyra Hush (Worldcom) agreed that the SMEs especially needed to be available for monthly meetings with regard to OSS and documentation questions/issues. Jill Williamson - (AT&T) discussed that there are times when issues are discussed with Account Teams that should have a change request initiated.

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October 17, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - Determine who initiates a change request when identified by a CLEC and Account Team.
3. THE DEFECT /EXPEDITE PROCESS	Jill Williamson (AT&T) explained that her "proposed" changes were provided in the "marked up" version of the CCP Process document she submitted. In summary, she went on to explain that AT&T is asking for improvements in turnarounds and to separate the defects from expedites. Bill Grant (Telcordia) discussed his concern with BellSouth's definition of a defect and a feature. He emphasized that just because BellSouth determines an issue is "working according to the baselined requirements" does not negate the fact that it is still a "defect" to the CLECs. Terrie Hudson (BST) explained that these definitions are a result of our vendor contracts with our IT suppliers.
	ACTION ITEM (BELLSOUTH) - There needs to be a "common" definition of defects. ACTION ITEM (CLECs/BELLSOUTH) - Separate Defects from Expedites ACTION ITEM (CLECs/BELLSOUTH) - Segment response time based on the "severity" of the defect.
	Woody Roe (Albion-Connect) reemphasized that the CLECs do not want a "fix" several releases and versions later. He stated that he needs the fix to occur on the release that's impacted or the current API, depending on severity.
	ACTION ITEM (BELLSOUTH) - Need "fixes" to occur on the current API that's impacted.

BELLSOUTH

October 17, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
4. RELEASE MANAGEMENT MILESTONES (i.e., documentation, testing)	Woody Roe (Albion-Connect) discussed that there is a big need for standardizing the Release calendar to include the following: • Dates of Releases • Rolling Release Schedule • Lifecycles identified for each release • Identify Documentation that is to be associated with each release Terrie went on to explain that Business Rules drive the Requirements. Currently, user requirements are reviewed with the CLECs. Jill Williamson (AT&T) explained that there is a concern that the CLECs are being told to go through their Account Teams regarding requirements questions, and are not receiving the appropriate responses. She went on to clarify that in her opinion, Account Teams should be contacted for interpretation of current Business Rules, but all future enhancements and associated Business Rules should go through CCP. Terrie Hudson (BST) reemphasized that it is BellSouth's goal to provide firm Release milestones which should ensure that documentation is more timely. In addition, final documentation will continue to be posted 30 days prior to a Release. Terrie summarized by saying that BellSouth is working to provide for an improved structure for Release milestones and should communicate any changes as soon as they are discovered.
	ACTION ITEM (BELLSOUTH) - Provide BST Release Milestones and Communicate deliverables slippage.

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CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
5. Change the format of the BellSouth Business Rules for Local Ordering (BBR-LO) guide.	Bill Grant (Telcordia) discussed the need for the implementation of a "matrix" format for the BBR-LO, similar to the way it was presented in an earlier Version 9A. Bill provided an example of this format and will send a "soft" copy to Change Control to provide to CLEC community for review. Bill explained that the current structure is not condusive to programming and coding work because it requires too much manual manipulation and translation. Kathy Rainwater (BST) expressed her concern that the CLECs may be using the Business Rules for coding and that is not what they are designed for. She explained that the Business Rules document should be used for "How to issue an LSR" , not to "code" from. Woody Roe (Albion-Connect) asked if there was a way for BellSouth to get the data elements and "matrix format" into a database for the CLECs to be able to manipulate more freely. Terrie Hudson (BST) asked if any CLECs would like to share or partner in the cost of a database solution for documentation. Woody Roe (Albion-Connect) stated that he thought he could make a serious case for sharing cost since his company would ultimately save money due to the extra work it is causing them to incur to translate the current document structure. Kathy Rainwater (BST) proposed that BellSouth leave the BellSouth Business Rules for Local Ordering (BBR-LO) in its current format, and start providing the User Requirements in the "matrix" format. In addition, Kathy also asked the CLEC's if she should continue to pursue the change request that was submitted to CCP dealing with splitting up the documents into several documents.
	ACTION ITEM (BELLSOUTH) - Evaluate documentation needs for provisioning vs. Requirements (Coding). Investigate an electronic solution for the document, preferably in a "matrix" format.
6. CODING CHANGES - 30 days is not sufficient time for CLECs to make coding changes. Need the Business Rules sooner. 30 days is sufficient for M&P changes only.	Terrie Hudson (BST) proposed to the CLECs that with the current Release 9.0, BellSouth will provide user requirements as soon as possible, however going forward, BellSouth will investigate providing "draft" requirements 90 days in advance and "Final" requirements 45 days prior to a Release.
	ACTION ITEM (BELLSOUTH) - BellSouth will investigate the possibility of providing "draft" requirements 90 days in advance and "Final" requirements 45 days prior to a Release.

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October 17, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
'. ADDITIONAL TOPICS SUBMITTED BY AT&T.	• CR0171 – AT&T's marked up version of the CCP Terrie Hudson (BST) suggested that the CLECs take this "marked up" version of the Process and come to a consensus and present back to the CCP. Jill Williamson (AT&T) will coordinate a meeting with the CLEC participants of Change Control to discuss the document. Tyra Hush (Worldcom) asked that BellSouth be a participant in this CLEC review meeting of the CCP document changes. Valerie Cottingham agreed that CCP would be represented in the review meeting.
	ACTION ITEM (CLECs) – Review the "marked-up" version of the CCP Process document (provided by AT&T). Come to consensus on changes and present back to CCP.
	• BellSouth's use of the Change Control Process Jill Williamson (AT&T) explained that she would like clarification on BellSouth's view of the CCP process and how can the CLECs be ensured that BellSouth is following the process. Tyra Hush (Worldcom) also agreed with Jill's concern and would like to ask BellSouth to share with the CLECs their internal processes vs. the external "published" process. Jill Williamson (AT&T) stated that the CLECs also need to understand how BellSouth develops their release schedule and what happens if the CLEC disagrees; how can that be resolved.
	ACTION ITEM (BELLSOUTH) – BellSouth will present its internal vs. external Change Control process at the next CCP Improvement Meeting.
	• Process for inclusion of non-OBF standard requests Jill Williamson (AT&T) explained that they need to know what is the procedures in developing the OBF vs. non-OBF standard. Tyra Hush (Worldcom) stated that there are many times when the CLECs do not want to wait till an issue gets OBF approval. There may be instances where an issue should be acted on and may go to OBF later.
	An additional concern was voiced by Quintessent that Terrie Hudson's organization needs to have a contact to facilitate questions that come up during testing. (i.e, business rules interpretation) Terrie Hudson (BST) will consider ways to improve this process.

BELLSOUTH

October 17, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
8. OTHER	Terrie Hudson (BST) announced that effective November 1, 2000, the Electronic Interface support group will move under her new organization along with the Testing Group
SUMMARY OF ACTION ITEMS	• BellSouth - Revision History should be attached to associated Carrier Notification Letters. • BellSouth - Determine who initiates a change request when identified by a CLEC and Account Team. • BellSouth - There needs to be a "common" definition of defects. • BellSouth/CLECs - Separate Defects from Expedites. • BellSouth/CLECs - Segment response time based on the "severity" of the defect. • BellSouth - Need "fixes" to occur on the current API that's impacted. • BellSouth - Provide BST Release Milestones and Communicate deliverables slippage. • BellSouth - Evaluate documentation needs for provisioning vs. Requirements (Coding). Investigate an electronic solution for documentation, preferably in a "matrix" format. • BellSouth - Investigate the possibility of providing "draft" requirements 90 days in advance and "Final" requirements 45 days prior to a Release. • BellSouth - BellSouth will present its internal vs. external Change Control process at the next CCP Improvement Meeting. • CLECs - Review the "marked up" version of the CCP Process document (provided by AT&T). Come to consensus on changes and present back to CCP.
NEXT MEETING - November 1, 2000	Location: Crown/Ravinia Hotel, Atlanta Georgia 9:00 AM EST - NOON - Room to be announced

Transmittal Cover Sheet for Pate Exhibit RMP-13

This sheet transmits the

November 1, 2000 CCP Process Improvement Meeting Minutes

which consists of 8 pages.

BELLSOUTH

November 1, 2000

CCP Process Improvement Meeting
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
CCP PROCESS IMPROVEMENT	Steve Hancock – Change Control Team	11/03/00
Crowne Plaza/Ravinia Hotel – Oakwood Room		

Participants/Attendees

PARTICIPANT	COMPANY
Terrie Hudson	BST - NCS/CS
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Steve Hancock	BST - CCP
Bill Grant	Telcordia
Stuart Walters	Network One
Jill Williamson	AT&T
Kevin McCall	BST - NCS/CS
Kathy Rainwater	BST - NCS/CS
Marsha Lees	SBC-Telecom
Rebecca Brouillet	Andersen Consulting
John Duffey	FL - PSC
Woody Roe	Albion-Connect
Anthony Zerillo	Birch Telecom
Phyllis Burt	Quintessent

PARTICIPANT	COMPANY
Rick Woodhouse	KPMG
Graham Watkins	KPMG
Kristen Hudson	XO
Doye Mote	BST - NCS/CS
Stephanie Smith	dset
Yvette Brown	espire
Rae Dupraw	Mpower
Sheriann Lively	Trivergent
Tyra Hush	Worldcom
Judy Novo	Mpower
Steve Murray	Rhythms
Kim Gillette-Hoskins	Quintessent
James Hunter	KPMG
Peggy Rehm	Nightfire
Brian Rutter	KPMG

Meeting Information History

DATE	START TIME	END TIME
11/01/00	9:00 AM EDT	12 NOON EDT

MEETING PURPOSE

To better understand the CLEC's needs with regard to the Change Control Process and to address action items from the October 17 meeting.

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

BELLSOUTH

November 1, 2000

CCP Process Improvement Meeting
MEETING MINUTES

Agenda Items	Discussion
. Review Action Items identified by CLECs/BellSouth at the 10-17-00 CCP Process Improvement meeting.	ACTION ITEM (BELLSOUTH) - Revision History should be attached to associated Carrier Notification Letters (Documentation). Status: Currently, BellSouth cannot commit to providing a "complete" revision history attached to the appropriate documentation letter 30 days from implementation. The "revision summary" is the last step completed when constructing the business rules. It would be very difficult if not impossible to accurately capture all of the changes that may ultimately be in the documentation that is changing. BellSouth could, however provide a "global" review of what areas will be impacted in the customer notification letter.
	Jill Williamson (AT&T) stated that 30 days notice is not enough time for coding changes and it would be helpful if BellSouth could indicate whether there is impact to "coding" in these letters. Kathy Rainwater (BST) responded that this kind of impact is given in subsequent letters outlining the "system/s" impacted. She also reiterated that effective immediately, all documentation changes are being funneled through CCP.
	- Effective November 1, for new documentation changes, BellSouth will state on the Customer Notification Letter whether the change is related to a system release or a documentation defect. Note: Some customer notification letters that post after 11/1 may not meet this commitment because the notification was enroute.
	ACTION ITEM (BELLSOUTH) - Determine who initiates a change request when identified by a CLEC and Account Team. Status: a) If an issue is discussed between the CLEC and their Account Team and BellSouth confirms that the issue is a defect, either in the electronic interface or in documentation, BellSouth will initiate a Type 6 change request through the Change Control Process. b) If an issue is discussed between the CLEC and their Account Team and the issue is determined to be an enhancement or "feature", the Account Team will refer the CLEC to their appropriate CCCM to initiate a Type 5 Change request and send through the Change Control process.

November 1, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - There needs to be a "common" definition of defects. Status: During the CLEC Process document review call on 10-27, the CLECs took the existing definition in the CCP Process document and added verbiage to include " where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data". *BellSouth committed to review the "updated" marked up version of the CCP process document and provide a response by the next CCP Process Improvement meeting.
	ACTION ITEM (BELLSOUTH/CLECs) - Separate Defects from Expedites. Status: Jill Williamson (AT&T) discussed that the CLECs had identified a need for separating defects from expedites. The CLECs have proposed that a new section be created for Exception/Expedites, thus separating an expedited request from a defect. BellSouth expressed concern that the current "proposed" language for an exception is broad and could allow for misuse. BellSouth would ask that the CLECs and BellSouth look at ways to "tighten up" this language. *BellSouth committed to review the "updated" marked up version of the CCP process document and provide a response by the next CCP Process Improvement meeting.
	ACTION ITEM (BELLSOUTH/CLECs) - Segment response time based on the "severity" of the defect. Status: Jill Williamson (AT&T) explained that the CLECs had identified new response time intervals based on the "severity" of the defect in their process review meeting on 10-27. *BellSouth will review this "updated" marked up version and provide a response by the next CCP Process Improvement meeting.

November 1, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - Need "fixes" to occur on the current API that's impacted. Status: TAG currently has nine (9) versions of the APIs in production supporting three (3) different platforms: Sun Solaris, Windows NT and HP. This means that there are 27 different APIs currently in production. If a defect occurs, the correction is made in the next available release (TCIF 7 and/or 9) because the defect may not be discovered until months after a release has been in production. Currently, TAG is averaging a Release per month. It is impractical and cost prohibitive to go back and propagate a change into potentially nine (9) versions of the APIs, simply because the APIs would expire long before the IT vendor could possibly schedule and incorporate a change.
	ACTION ITEM (BELLSOUTH) - Provide BST Release milestones and communicate deliverables slippage. Status: BellSouth is committed to providing milestones for Releases. Milestones were provided at the 10-25 monthly status meeting call with the CLECs. For slippages, BellSouth indicated that the owner of the slippage would provide the notification quickly to Change Control. BellSouth is continuing to explore new ways of posting these notifications quicker such as a new "expedited" notice process that is now in place to get customer notifications processed quicker.
NEW ACTION ITEM (BELLSOUTH) - If BellSouth discovers that documentation will be slipped, Change Control will communicate the customer notification letter appropriately updating the reasons for the slippage.	

November 1, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
	Tyra Hush (Worldcom) will be providing BellSouth with an example of another ILEC's release milestones for review. Jill Williamson (AT&T) asked BellSouth how far in the future would release information be provided. In addition, AT&T asked if BellSouth would implement quarterly releases. BellSouth responded that it is their goal to offer fewer, more robust releases with more features. BellSouth discussed that their plans are to roll-out new internal processes by the end of November. BellSouth will present these changes to the CLECs at the next CCP meeting. The internal process to be presented will include the flow of CLEC notification. In addition, the internal Release planning will also be changing and the 2001 schedule will be present to the CLECs at the next CCP meeting.
	ACTION ITEM (BELLSOUTH) - Evaluate documentation needs for provisioning vs. Requirements (Coding). Investigate an electronic solution for documentation, preferably in a "matrix" format. Status: BellSouth will continue pursuing an "electronic solution" for documentation/requirements and will be providing an update at the next CCP meeting. The "matrix" example that was provided by Telcordia will be used as a guide.
	ACTION ITEM (BELLSOUTH) - Investigate the possibility of providing "draft" requirements 90 days in advance and "final" requirements 45 days prior to a Release. Status: BellSouth is investigating internal process to have requirements provided earlier. An update will be provided at next CCP process improvement meeting.
	Jill Williamson (AT&T) explained that 90 days for "draft" requirements was not sufficient for major changes and would need 180 days.
NEW ACTION ITEM (BELLSOUTH) - The CLECs would request that BellSouth provide "draft" requirements 90 days in advance for minor enhancements to existing versions, and 180 days in advance for major release changes.	
NEW ACTION ITEM (BELLSOUTH/CLECs) - BellSouth will communicate the time intervals that will need to occur for CLEC Test Environment requirements to be received by the CLECs in a timely manner. Albion/Connect will provide summary of concerns and recommendations of timelines as it relates to the CLEC Test environment.	

November 1, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - BellSouth to present its internal vs. external change control process after a change request is "prioritized". Status: BellSouth is currently looking at ways to streamline its internal processes and will be presenting its recommendations at the next CCP process improvement meeting. BellSouth would also request that the CLECs provide more detail on their change requests which will greatly reduce clarification and help facilitate the turnaround of these requests. BellSouth also illustrated to the CLECs that the current environment suggests that depending on the system impacted, dictates how BellSouth can implement change requests. Discussions are ongoing between BellSouth and their IT vendors to improve the delivery of changes concurrently.
NEW ACTION ITEM (BELLSOUTH) - BellSouth will begin discussing all "New" Change Requests in the Monthly Status Meetings. BellSouth SME's will be available during the discussion and the Originator of each new Change Request will need to discuss their request with the team.	
	ACTION ITEM (CLECs) - Review the "marked up" version of the CCP process document (provided by AT&T). Come to consensus on changes and present back to CCP. Status: Jill Williamson (AT&T) facilitated a meeting on 10-27 with the CLECs to review this "marked up" version and reach a consensus on its recommendation to BellSouth. BellSouth will review these changes and will provide its response by the next scheduled CCP process improvement meeting.
NEW ACTION ITEM (AT&T) - Jill Williamson will provide updated "marked up" version of the CCP process document and the minutes from the 10-27 meeting to Change Control for distribution to the CLECs.	
NEW ACTION ITEM (BELLSOUTH) - BellSouth will provide a report of internal changes that have a positive impact and improve performance for CLECs, but do not require coding. These changes improve "flow-through" in BellSouth and would require no vote by the CLECs.	
	Jill Williamson (AT&T) explained that BellSouth internal releases could negatively impact the CLECs and the CLECs may want to test before the release goes in.
2. Additional discussion topics	CR0171 - AT&T's marked up version of the CCP Process document. (Addressed in earlier action item)

November 1, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
	PROCESS FOR APPEALING BELLSOUTH'S RELEASE SCHEDULE - Jill Williamson (AT&T) stated that if the CLECs understand the size and the scope of releases, they will be glad to work with BellSouth on "re-arranging" changes.
	PROCESS FOR INCLUSION OF NON-OBF STANDARD REQUESTS - Jill Williamson (AT&T) stressed the need to find a way to push "non-OBF" approved requests through the change control process. BellSouth suggested that the issue be discussed in a monthly status meeting with the appropriate SME to review. This will allow both parties to talk through the issue and decide collectively whether it can be worked.
NEW ACTION ITEM (BELLSOUTH) - BellSouth will propose a process on how we would collectively evaluate a non-OBF standard request.	
3. NEW ISSUES	Jill Williamson (AT&T) discussed that a new process needs to be implemented that will allow the CLECs to vote on rejecting a change request before it is prioritized for implementation at a Change Review Meeting. This would give the CLECs the opportunity to say that they do not want an issue implemented when it negatively impacts them.
NEW ACTION ITEM (AT&T) - Jill Williamson will add verbiage around creating a new process for CLECs to vote on rejecting a change request before it is prioritized for implementation. This will be added to the "marked up" version of the Change Control process document.	
. SUMMARY OF ACTION ITEMS	• BellSouth - Effective November 1, for documentation changes, BellSouth will state on the Customer Notification Letter whether the change is related to a system release or a documentation defect. Note: Some customer notification letters that post after 11/1 may not meet this commitment because the notification was enroute.
	• BellSouth - If BellSouth discovers that documentation will be slipped, Change Control will communicate the customer notification letter appropriately updating the reasons for the slippage.
	• BellSouth - BellSouth to provide "draft" requirements 90 days in advance for minor enhancements to existing versions, and 180 days in advance for major release changes.

November 1, 2000

CCP Process Improvement Meeting

MEETING MINUTES

Agenda Items	Discussion
	• BellSouth - BellSouth will communicate the time intervals that will need to occur for CLEC Test Environment requirements to be received by the CLECs in a timely manner.
	• Albion/Connect - To provide summary of concerns and recommendations of timelines as it relates to the CLEC Test Environment.
	• BellSouth - BellSouth will begin discussing all "New" change requests in the monthly status meetings. BellSouth SMEs will be available during the discussion and the originator of each new request will need to discuss their request with the team.
	• AT&T - AT&T will provide update "marked up" version of the CCP process document and the minutes from the 10-27 meeting to Change Control for distribution to the CLECs.
	• BellSouth - BellSouth will provide a report of internal changes that have a positive impact and improve performance for CLECs, but do not require coding. These changes improve "flow-through" in BellSouth and would require no vote by the CLECs.
	• BellSouth - BellSouth will propose a process on how they would collectively evaluate a non-OBF standard request.
	• AT&T - AT&T will add verbiage around creating a new process for CLECs to vote on rejecting a change request before it is prioritized for implementation. This will be added to the "marked up" version of the Change Control process document.
NEXT MEETING - December 7, 2000	Location: BellSouth Conference Center 1:00 - 4:00 PM EST - Room to be announced

Transmittal Cover Sheet for Pate Exhibit RMP-14

This sheet transmits the

December 7, 2000 CCP Process Improvement Meeting Minutes

which consists of 5 pages.

BELLSOUTH

December 7, 2000
CCP Process Improvement Meeting
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
CCP PROCESS IMPROVEMENT	Steve Hancock – Change Control Team	12/11/00
BellSouth Center		

Participants/Attendees

PARTICIPANT	COMPANY
Terrie Hudson	BST - NCS/CS
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Steve Hancock	BST - CCP
Bill Grant	Telcordia
Stuart Walters	Network One
Jill Williamson	AT&T
Kevin McCall	BST - NCS/CS
Marva Goff	BST - Regulatory
Doyle Mote	BST - NCS/CS
Tammy Swanson	Andersen Consulting
John Duffey	FL - PSC
Martha Weber	BST - NCS/CS
Anthony Zerillo	Birch Telecom
Phyllis Burt	Quintessent
Jane Hunter	Sprint
Kacey Lane	AT&T Broadband
Shamone Stapler	ITC/Deltacom

PARTICIPANT	COMPANY
Rick Woodhouse	KPMG
Graham Watkins	KPMG
Kristen Hudson	XO
Shirley Roberts	KMC Telecom
Brent Marshall	US Dept. of Justice
Lorraine Watson	Worldcom
Rae Dupraw	Mpower
Sheriann Lively	Trivergent
Tyra Hush	Worldcom
Sandy Evans	Sprint
Steve Murray	Rhythms
Kim Gillette-Hoskins	Quintessent
James Hunter	KPMG
Peggy Rehm	Nightfire
Brian Rutter	KPMG
Ellen Knight	Sprint
Colette Davis	Covad

Meeting Information History

DATE	START TIME	END TIME
12/07/00	1:00 PM EST	4:00 PM EST

MEETING PURPOSE

To better understand the CLEC's needs with regard to the Change Control Process and to address outstanding action items from the October 17 and November 1 meetings.

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

BELLSOUTH

December 7, 2000
CCP Process Improvement Meeting
MEETING MINUTES

Agenda Items	Discussion
1. Review Action Items identified by CLECs/BellSouth at the 11-01-00 CCP Process Improvement meeting.	The Action Items from the 11-01-00 CCP Process Improvement meeting were not discussed due to the need to dedicate more time to cover the "marked up" CLEC document.
2. Review of CR0171 - CLEC Recommended changes to the CCP Process Document	BellSouth explained that their intent for the meeting was to move straight through the document. All BellSouth responses to the "marked up" document will appear in "Orange" type. In addition, BellSouth stated that the "internal processes " would be covered as we reviewed the document.
	Page 7 - Changes surrounding "training materials and job aids" BellSouth recommends taking this "language" out because this needs to be further clarified as to which training materials and job aids would be in the scope of CCP.
	NEW ACTION ITEM (BELLSOUTH) - BellSouth to investigate how "unofficial documentation" and "job aids" will be supported.
	NEW ACTION ITEM (BELLSOUTH) - BellSouth will investigate the PQT and start up team documentation. Is there a relationship between the two teams.
	Page 8 - 7th Bullet - CLECs recommended that language read "Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a defect should be submitted to the Change Control Team.
	Pages 11-12 - BellSouth recommended that the CLEC changes noted should be discussed in the Expedited Feature Process.
	Page 18 - Type 1 System Outage Detail Process Flow - BellSouth recommended changing the "language" for Step 1 - #4 to read "ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the outage". BellSouth explained that in the current ECS process, a trouble ticket is given when requested. After the initial trouble is reported, a new trouble ticket must be opened by EC Support internally to log the trouble with the appropriate service center for correction. This internal trouble ticket is posted on the CCP web posting. The CLECs were concerned that without a ticket number, there would be no way for them to refer to a reported trouble. In addition, the CLECs discussed that there had been occasions that a call back was not received from the ECS group.
	NEW ACTION ITEM (BELLSOUTH) - BellSouth will investigate adding the system outage ticket number with Type 1 email notification.

December 7, 2000
CCP Process Improvement Meeting
MEETING MINUTES

Agenda Items	Discussion
	NEW ACTION ITEM (BELLSOUTH) – BellSouth will investigate CLECs not getting a call back from EC Support.
	TYPES 2-5 Process Flow – Page 22 – CLECs asked BellSouth to replace all bulleted items that reference "release implementation date" with "CLEC testing with BellSouth". In the second bulleted item, the CLECs asked that BellSouth provide the technical specs and API's at the same time as the final requirements.
	NEW ACTION ITEM (BELLSOUTH) – CLECS need the API and Specs at the same time as the final requirements, 45 days prior to external test start date.
	NEW ACTION ITEM (BELLSOUTH) – Investigate if BellSouth can update text for all requirement dates as "before CLEC testing with BellSouth". Currently it says "...changes/notifications will be provided ___ days before release implementation date.
	TYPES 2-5 Process Flow – Page 22 – Third bulleted item, the CLECs request the "language" to read – "NLT 180 calendar days ..." Fourth bulleted item, CLECs requested the "language" to read – "NLT 120 days ..." rather than 60 days.
	NEW ACTION ITEM (BELLSOUTH) – BellSouth will investigate getting 120 days notice for final user requirements for implementing a new TCIF map. Notification would be provided 240 days and draft requirements, 180 days. At 120 days, EDI and TAG specs will be provided.
	During the discussion surrounding the TCIF map, it was suggested that BellSouth add sub-team guidelines and roles/responsibilities surrounding such teams into the CCP process document.
	NEW ACTION ITEM (BELLSOUTH) – BellSouth will investigate adding "sub-team" guidelines – roles/responsibilities and the interaction with Change Control and the CLEC community.
	TYPES 2-5 Process Flow – Page 22 – Last bulleted item, the CLECs request the "language" to be added for "all documentation changes, both system and non-system impacting.
	NEW ACTION ITEM (BELLSOUTH) – BellSouth to add "language" to address all documentation changes, both non-system and system impacting being provided no later than 30 days prior to a release.
	Due to time constraints, BellSouth and the CLECs agreed to move their attention to the Expedited Feature and Defect sections. Valerie Cottingham (BellSouth) explained that BellSouth does not support combining "Exceptions" with the Expedited Feature process flow. It is BellSouth's opinion that exceptions would generally be asking for "an extension of time" and an expedited feature would be asking for "an expedited time frame" which would be contradictory. BellSouth considers an "exception" to be synonymous with an "escalation. The CLECs agreed that "exceptions" should not be part of the Expedite Process but incorporated into a separate process and not be addressed via the "Escalation" process.

Agenda Items	Discussion
	NEW ACTION ITEM (BELLSOUTH) - BellSouth will investigate documenting an "exception process" separately in the CCP process document.
	EXPEDITED FEATURE PROCESS - Page 37 - BellSouth presented a "separate" section for expedited features. The definition was changed slightly from the CLEC version to better clarify the intent. In addition, two examples of an expedited feature were presented: Re-classified defects and an enhancement to an existing product or service. The CLECs requested that the discussion be moved to Section 5 - Defects because of the need to agree on the Defect process flow before going further into the Expedite Feature discussion.
	NEW ACTION ITEM (BELLSOUTH) - BellSouth to provide an example of a re-classified defect in the expedited feature section.
	SECTION 5 - Defect Process - Page 42 - CLECs recommended that BellSouth place the term "Emergency Changes" into the title for Defects. BellSouth will address this concern as an action item. Page 42 - BellSouth recommended changes in the definition of a defect by "splitting" the second bullet into two separate bullets. BellSouth did not agree to support the fifth bullet that was added by the CLECs stating "where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly data". BellSouth considered this to be covered in the current definition, however after lengthy discussion, BellSouth agreed to add "language" into the definition to cover these situations.
	NEW ACTION ITEM (BELLSOUTH) - BellSouth will investigate adding "Emergency Change" into the title for Section 5.0 - Defect Process.
	NEW ACTION ITEM (BELLSOUTH) - BellSouth will investigate adding "language" to include the following into the definition of a defect - "functional requirements are incorrect even though business requirements/rules match".
4. SUMMARY OF ACTION ITEMS	• *BellSouth to investigate how "unofficial documentation" and "job aids" will be supported.*
	• *BellSouth will investigate the PQT and start up team documentation. Is there a relationship between the two teams.*
	• *BellSouth will investigate adding the system outage ticket number with Type 1 email notification.*
	• *BellSouth will investigate CLECs not getting a call back from EC Support.*
	• *CLECS need the API and Specs at the same time as the final requirements, 45 days prior to external test start date.*

December 7, 2000
CCP Process Improvement Meeting
MEETING MINUTES

Agenda Items	Discussion
	• *Investigate if BellSouth can update text for all requirement dates as "before CLEC testing with BellSouth". Currently it says "...changes/notifications will be provided ___ days before release implementation date.*
	• *BellSouth will investigate getting 120 days notice for final user requirements for implementing a new TCIF map. Notification would be provided 240 days and draft requirements, 180 days. At 120 days, EDI and TAG specs will be provided.*
	• *BellSouth will investigate adding "sub-team" guidelines - roles/responsibilities and the interaction with Change Control and the CLEC community.*
	• *BellSouth to add "language" to address all documentation changes, both non-system and system impacting being provided no later than 30 days prior to a release.*
	• *BellSouth will investigate documenting an "exception process" separately in the CCP process document.*
	• *BellSouth to provide an example of a re-classified defect in the expedited feature section.*
	• *BellSouth will investigate adding "Emergency Change" into the title for Section 5.0 - Defect Process.*
	• *BellSouth will investigate adding "language" to include the following into the definition of a defect - "functional requirements are incorrect even though business requirements/rules match".*
NEXT MEETING - January 10, 2000	Location: BellSouth Conference Center, 1447 NE Expressway, Atlanta, GA. (404-321-8000) 9:00 - 4:00 PM EST - Ballroom A - Conference Bridge: 205-969-4211 Access #: 5539

Transmittal Cover Sheet for Pate Exhibit RMP-15

This sheet transmits the

CCP Interim Document, Version 1.4, with AT&T's Proposed Changes

which consists of 49 pages.

BELLSOUTH

CHANGE CONTROL PROCESS

INTERIM

CCP.DOC

VERSION 1.4

APRIL 14, 2000

The following document consolidates input from CLECs and BellSouth. It is a working document for discussion purposes only.

Issued: 04/26/0004/25/0004/24/00

Jointly Developed by the Change Control Sub-team comprised

of BellSouth and CLEC Representatives.

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

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VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

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of BellSouth and CLEC Representatives.

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes

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SEE ATTACHED FORMS 4546

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SEE ATTACHED FORMS 4647

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SEE ATTACHED DOCUMENTS 4748

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

1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance)
- Defects
- Testing

The scope of the Change Control Process **does not** include the following:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation

~~Testing Support (i.e. negotiating/coordinating test agreements and dates)~~
~~Issue Resolution/Questions (i.e. questions associated with interface functionality, interpreting documentation)~~

Change Requests of this nature will be handled through existing BellSouth processes.

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp.html

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing. Notifications will be posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes).

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes).

Type 6- CLEC Impacting Defects and Emergency Changes.

Any non-Type 1 change where a CLEC Impacting defect, interface or business rule discrepancy is found in a production and is impacting a CLECs ability to exchange transactions with BellSouth~~environment when the system is not operating as specified in the baselined business requirements~~. The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Type 6 Changes should be categorized in the following manner:

Severity 1: **Interface Unusable** – Interface discrepancy results in totally unusable interface. CLEC Pre-Orders / Orders / Queries / Maintenance Requests cannot be submitted or will not be accepted by BellSouth. Manual workarounds are not feasible. Change is considered essential to continued operation. BellSouth and the CLECs will work to resolve the discrepancy as quickly as possible.

Severity 2: **Interface Affecting** – Pre-Orders / Orders / Queries / Maintenance Requests require workarounds on the part of BellSouth or the CLECs. Change is considered critical to efficient operations. BellSouth and the CLECs will work to resolve the discrepancy in a timely manner.

Severity 3: **Process Impacting** – Pre-Orders / Orders / Queries / Maintenance Requests can be submitted and will be accepted through normal process/interfaces. Clarification is considered critical to ongoing operations. BellSouth will work to provide appropriate documentation on an expedited basis.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects will be handled through the Change Control Process.

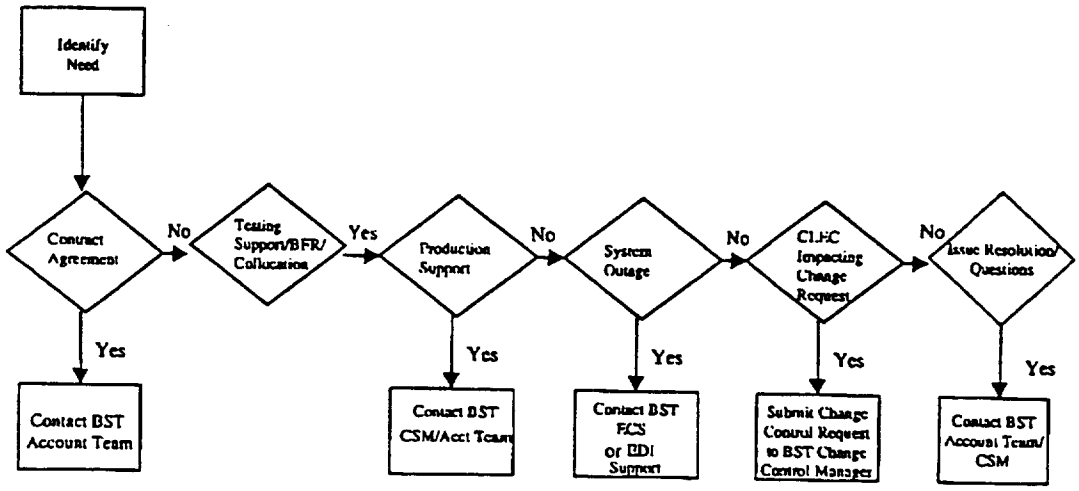

Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following two sub-sections describe the process flows for typical Type 1 through Type 5 changes. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

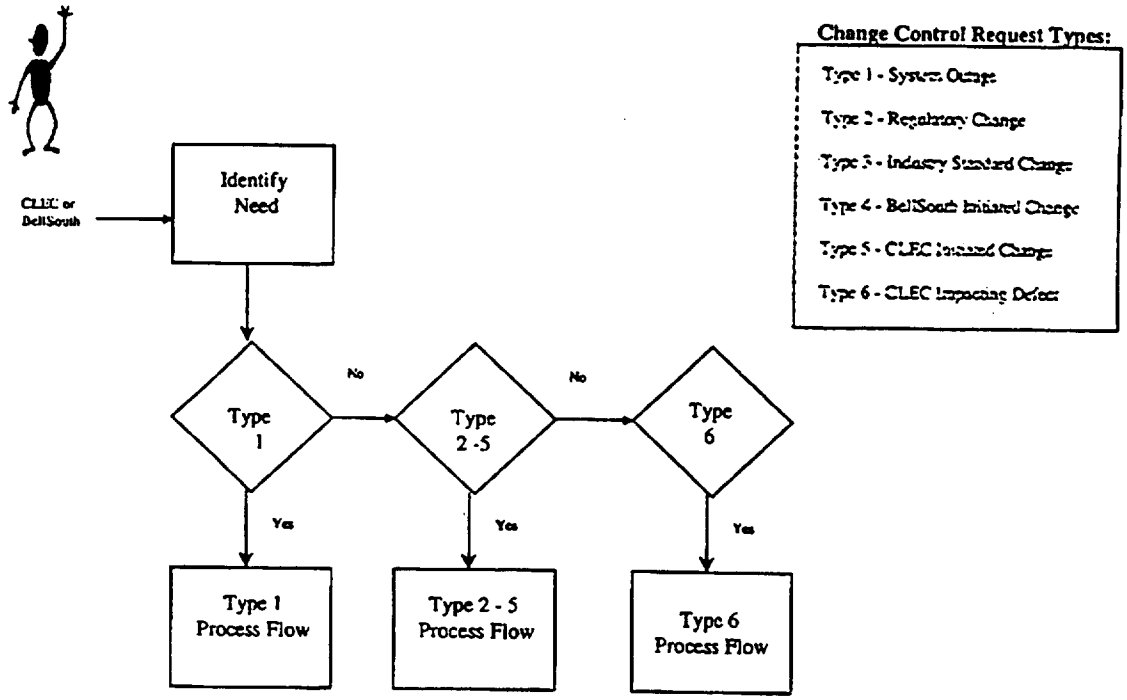

Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

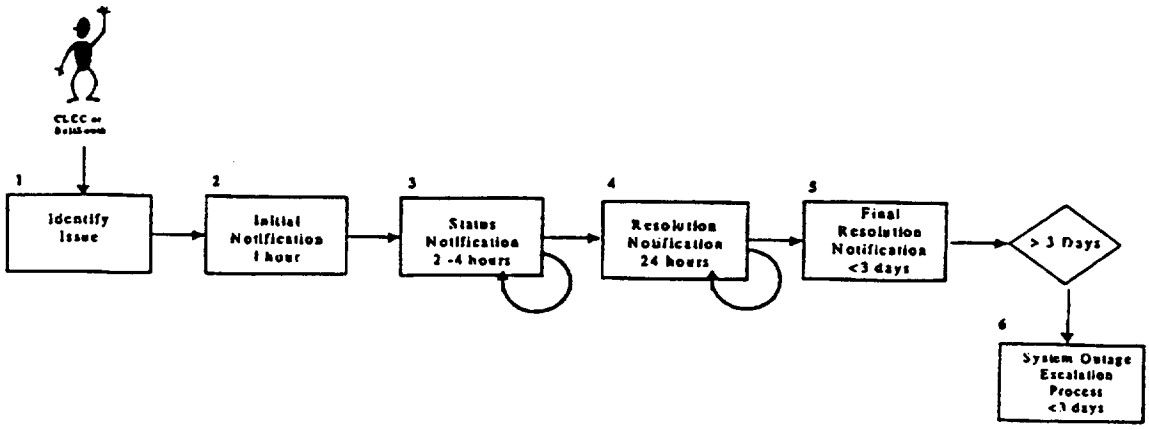

Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	IDENTIFY ISSUE: 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number and record and track the outage.	INPUTS: • Issue Characteristics • Call to ECS Helpdesk OUTPUTS: • Recorded Outage	N/A
2	ECS	INITIAL NOTIFICATION: 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis. 3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the	INPUTS: • Recorded Outage OUTPUTS: • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and posted to the

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		web.
3	ECS	**STATUS NOTIFICATION:** **(ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	ECS CCCM	**RESOLUTION NOTIFICATION:** **(ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the defect box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage
5		**FINAL RESOLUTION NOTIFICATION:**	**INPUTS:** • Final Resolution	< 3 days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
	ECS	1. The final resolution notification is posted on the Web.	Information OUTPUTS: • Final Resolution Notification	
6	CCCM ECS	ESCALATION 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 7.	INPUTS: • Information or concern relating to a Type 1 - Systems Outage OUTPUTS: • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page.

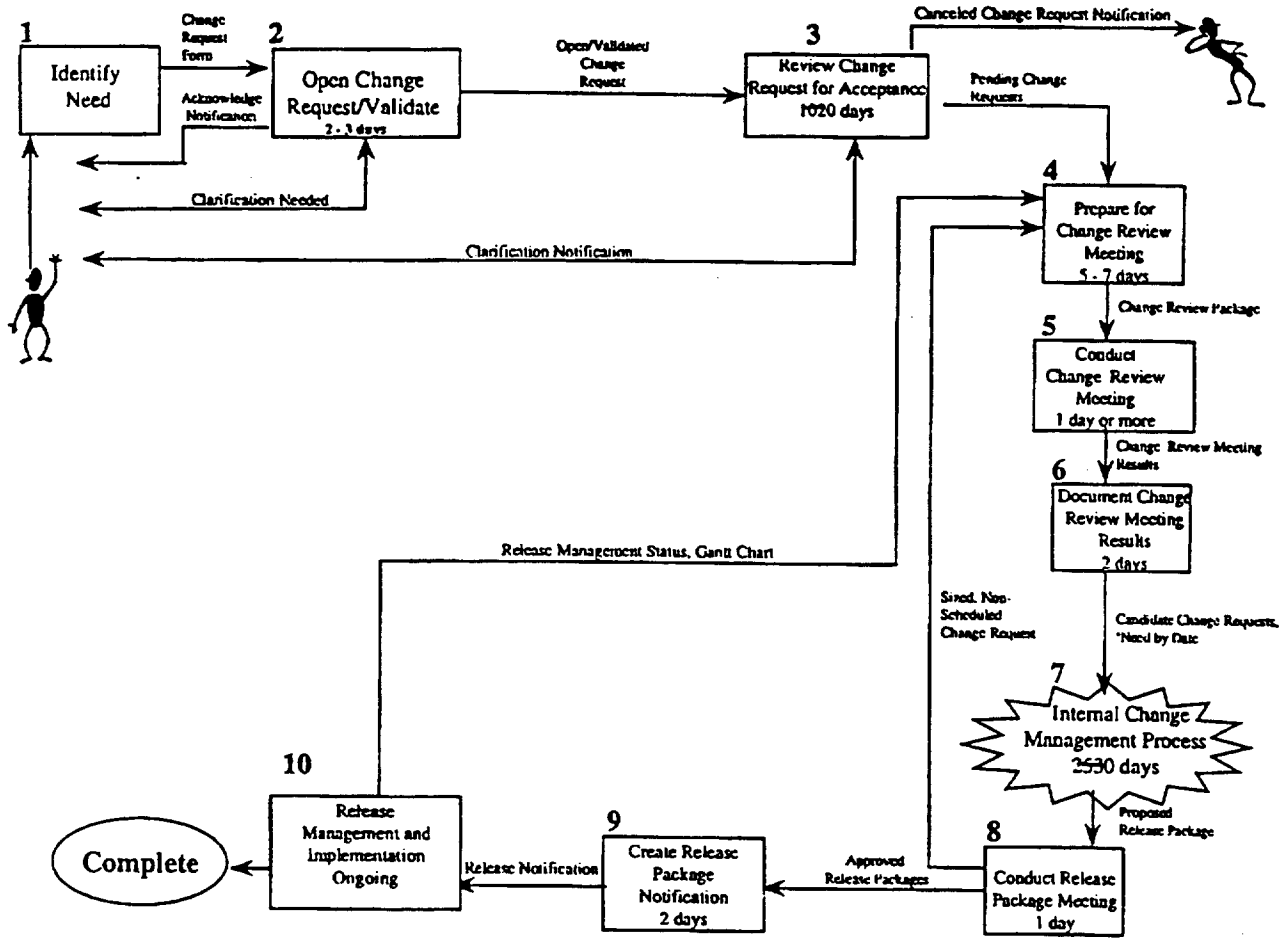

Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- Software Release Notifications will be provided 30 days or more in advance of the implementation date.
- Requirements for software releases or systems modifications will be provided to CLECs 90 days or more in advance of the implementation date.
- Documentation changes will be provided 30 days or more in advance of implementation date.
- CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	IDENTIFY NEED 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	INPUTS: • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) OUTPUTS: • Completed Change Request Form with related documentation	N/A
2	BCCM	OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification	INPUTS: • Completed Change Request Form with related documentation • Change Request Form	2-3 Bus Days Clarification times would

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		(Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification posted on web	be in addition to cycle time.
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Determine status of request: • If change already exists, ~~exists or training issue~~ forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request ~~Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team.~~ • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. • ~~If a request is not accepted, update change request status to 'CB' for "Cancelled BellSouth" and provide notification and explanation to originator.~~	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	~~20~~ 10 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		NOTE: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. 3. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 4. ~~BST may reject the change request based on the following reasons: cost/benefit, resource commitments, industry direction or BellSouth direction and will provide notification to the originating party.~~		
4	BCCM CCCM	PREPARE FOR CHANGE REVIEW MEETING NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. BCCM 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. CCCM 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting.	INPUTS: • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log OUTPUTS: • Change Request Log • CLEC Draft Priority List	5-7 Bus Days
5	BCCM CCCM	CONDUCT CHANGE REVIEW MEETING Monthly Status Meetings 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects) at monthly status meeting. 3. Review current Release Management statuses.	INPUTS: • Change Request Log • CLEC Draft Priority List • Desired/Want Dates • Impact analysis OUTPUTS: • Meeting minutes • Updated Change Request Log	1 Bus Day (or as needed based on volume) Meeting Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Prioritization Meetings (held as needed based on published release schedule) 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. Discuss Impacts. 4. Prioritize Change Requests. 5. Develop final Candidate Requests list of Pending Change Requests by interface, 'Need by Dates' and prioritized Change Requests. 6. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 7. Review issues and action items and assign owners.	• Candidate Change Request List • Issues and Actions Items (if required)	
6	BCCM	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities only to the Candidate Change Requests that meet the criteria established by the Internal Change Management Process. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	**INPUTS:** • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log **OUTPUTS:** • BellSouth's Proposed Release Package	~~30~~ 25 Bus Days
8	BCCM	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda.	**INPUTS:** • BellSouth's Proposed Release Package	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
	CCCM	2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process. 5. Based on BST/CLEC consensus create Approved Release Package. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting. 8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".	• BellSouth's Release Schedule • Change Request Log **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • Non-Scheduled Change Requests (Return to Step 4) • Date for initial Release Management Project Meeting	
9	BCCM	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. 4. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Implemented Change Request	Ongoing

5.0 DEFECT NOTIFICATION OR EMERGENCY CHANGE PROCESS

A CLEC or BellSouth identified defect or emergency change will enter this process through the Change Management Team. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting. CLEC Notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect.

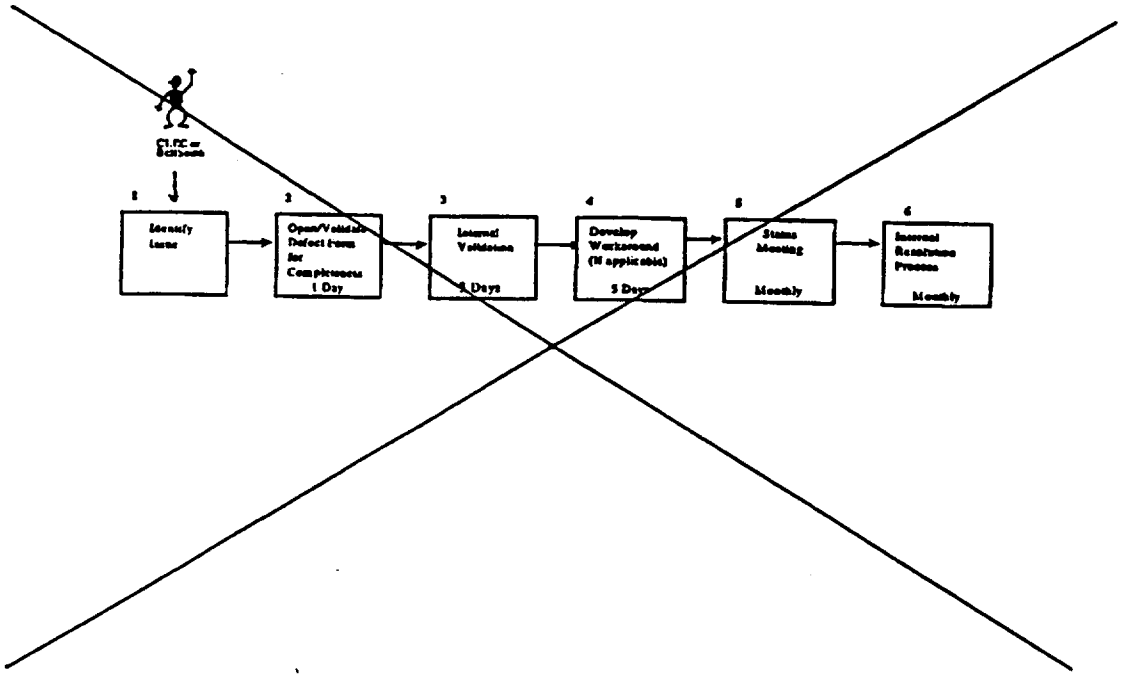

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide defect and status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	IDENTIFY NEED 1. Identify Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a defect. 3. Attach related requirements and specification documents. These attachments should include the following, if available: • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	INPUTS: • Change Request with defect indicated OUTPUTS: • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. ~~2.~~ 3. Establish Defect status ('N' for New Defect). ~~3.~~ 4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist. ~~4.~~ 5. Verify Defect specifications and related information exists. ~~5.~~ 6. Send Clarification Notification via email to the originator if needed. ~~6.~~ 7. Update Defect Status to' PC' for Pending Clarification if clarification is needed.	INPUTS: • Completed Change Request Form (with related documentation if necessary) OUTPUTS: • New Defect • Acknowledgment Notification • Clarification Notification (if required)	4 hrs for Severity 1 & 2 1 Bus Day for Severity 3~~4 Bus Day~~

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Defect Clarification Response.		
3	BCCM	INTERNAL VALIDATION 1. Validate that it is a defect. 2. Perform internal defect analysis. 3. Determine status of request: • If change already exists ~~or training issue~~ forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request ~~Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team.~~ • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect. ~~If the process is operating as specified in the baselined requirement, the "Defect Request" will be cancelled and supporting information provided via email to the originator. Update Change Request status to 'DC' for Defect Cancelled and send Cancellation Notification via email to originator.~~ • ~~If issue is re-classified as a feature change, update Change Request status to "P" for Pending and provide supporting information via email to the originator.~~ NOTE: See Section 9.0 Terms and Definitions – Defect Status for valid status codes and descriptions. Defect notification will be provided to CLEC community via e-mail and web posting.	INPUTS: • New Defect OUTPUTS: • Validated Defect • Defect notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	1 bus day for Severity 1 & 2 3 Bus Days for Severity 3~~3 Bus Days~~

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
4	BCCM	DEVELOP WORKAROUND (IF APPLICABLE) 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC. 4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. Defect workaround notification will be provided to CLEC community via e-mail and web posting. If necessary, a conference call will be established with CLECs to discuss the workaround. If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting. This will only apply to Severity 3 defects. In this instance, BellSouth will continue to process orders until a workaround is identified	INPUTS: • Validated Defect • Clarification Notification (if required) OUTPUTS: • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • E-mail and web posting of workaround	1 bus day for Severity 1 & 2 5 Bus Days for Severity 3~~5 Bus Days~~
5	BCCM	MONTHLY STATUS MEETING 1. Provide status of Defect. 2. Solicit CLEC/ BST input. 3. Update Defect information as needed.	INPUTS: • Defects Received • Change Request Log • Defect Analysis • Workaround (if applicable) OUTPUTS: • Updated status • Updated Change Request Log • Meeting minutes	Monthly or when status changes, whichever occurs first
6	BCCM	INTERNAL RESOLUTION PROCESS 1. Schedule and evaluate Defects based on capacity and business impacts to the CLECs. 2. Update status of scheduled Defects to 'S' for Scheduled. 3. Provide status and Defect Release	INPUTS: • CLEC/ BST input OUTPUTS: • Defect Release Schedule • Scheduled Defects	Monthly

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Schedule at next Monthly Status Meeting. 4. Update status of Implemented Defects to 'I' for Implemented.	• Implemented Defects	

6.0 CHANGE REVIEW

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be scheduled to coincide with the published release schedules. For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular interface are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 33 business days prior to the Change Review Meeting to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to coincide with the published release schedules and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda

- Change Request Log (List of Change Requests to be reviewed)
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish "desired/want" dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- Voting on an interface not used by the CLEC is prohibited
- One vote per CLEC, per interface
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category, by interface
- Manual processes and documentation will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth Originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as ~~A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30 - 45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and socialize ideas.~~ BellSouth will provide specifications on the interface being developed to the CLEC Community. As new interfaces are deployed, they will be added to the scope of this document as appropriate, based on the use by the CLEC community and requested changes will be managed by this process.

Retirement of Interfaces

The retirement of interfaces will not be part of the Change Control Process. As active interfaces are retired, BellSouth will post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to give provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five day turnaround for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications will be distributed by Change Control to the industry unless there is a proprietary issue. ~~All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.~~

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Susan Hart Manager - EC Support Group Interconnection Operations	205-733-5393	1-800-946-4646 PIN 1436470	Susan.K.Hart@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
  - Definition and escalation of item.
  - History of item.
  - Reason for escalation.
  - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.
- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

ESCALATIONS SHOULD BE WITHIN INFORMATION TECHNOLOGY.

Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Terrie Hudson AVP Sales	770-936-3740	Terrie.Hudson@bridge.bellsouth.com
3rd Level	TBD VP Sales		

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

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, BellSouth and the impacted CLEC(s) ~~agree to~~may follow this Dispute Resolution Process. BellSouth and the CLEC shall assemble a Joint Investigative Team, within one week, comprised of subject matter experts. The party prompting the dispute should initiate the formation of the team. The team should be co-chaired by representatives of BellSouth and the CLEC respectively. The investigative team will conduct a root-cause analysis to determine the source of the problem, if one exists, and then develop a plan for remedying it. The parties to the dispute must escalate the issue within each company to the person who has ultimate authority for State operations in an effort to achieve a resolution.

If the dispute cannot be resolved between the companies after these steps are taken, then either party to the dispute may file a formal complaint with the State PSC through the Director of the Telecommunications section for binding mediation. The Director of the Telecommunications section, or his appointee, shall rule upon the complaint within 30 days of its filing. If either party is then aggrieved, it may file a formal complaint with the State PSC.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc". The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings. All changes will be submitted as a change request and reviewed.

10.0 ~~TESTING ENVIRONMENT~~ TESTING

Requests related to testing of processes and interfaces will be included in the Change Control Process. Changes to BellSouth's testing environments and supporting processes will be submitted through the Change Control Process as a Type 5 request. The requests will follow the guidelines and intervals set forth in the Type 5 process flow.

~~BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.~~

~~BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing only after "major releases". CLECs are selected on a "first come, first serve basis".~~

~~New Carrier Testing is offered to those CLEC's who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.~~

~~For additional details on the testing environment, regulations and guidelines, you will be able to refer to the BellSouth public internet site by the end of May 2000. The internet web site is as follows:~~

~~www.interconnection.bellsouth.com/markets/lec.html~~

~~BellSouth is currently investigating and pricing the feasibility of a wholly separate, non-production testing environment for all pre-ordering and ordering interfaces per a CLEC request. This testing environment will mirror the production environment.~~

11.0 TERMS AND DEFINITIONS

A

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing Change Requests and defects.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
  - ◊ Dependencies relative to other data elements
  - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: BST cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.
- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- Type 6 – CLEC Impacting Defect. Any non-Type 1 change where a CLEC Impacting Defect is found in a production environment when the system is not operating as specified in baseline business requirements.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CB = Cancellation by BellSouth.** BST may reject the change request based on the following reasons: cost/benefit, resource commitments, industry direction or BellSouth direction.
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.
  - **CT = Training.** Requested change already exists, additional training may be required.
- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at an Change Review Meeting, but did not reach the Candidate Request List (Step 10).
- **D** = Request Purge. Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled.** Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Request, generate Candidate Change Request, and submit Candidate Change Request for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Approved Release Package, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect (Documentation). A condition where the documentation does not agree or accurately reflect the business environment.

Defect (Electronic Interfaces). A defect found in a production environment when the system is not operating as specified in a baseline business requirement's document.

Defect Status. The status of a CLEC Impacting Defect Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.

- **CT = Training.** Requested change already exists, additional training may be required.
- **DC = Defect Cancelled.** Process is operating as specified in the baseline requirements.

- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect.** Indicates internal analysis has been conducted and it is determined that it is a validated defect (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Maintenance/Defect Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

Transmittal Cover Sheet for Pate Exhibit RMP-16

This sheet transmits the

CCP Document, Version 2.0, with AT&T's Proposed Changes

which consists of 70 pages.

BELLSOUTH

CHANGE CONTROL PROCESS

CCP8_23.DOC

VERSION 2.0

AUGUST 23, 2000

Issued: 9/15/00 ~~8/23/00~~

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

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

This document is not to be construed as a suggestion to any manufacturer to modify or change any of its products, nor does this document represent any commitment by BellSouth Telecommunications to purchase any product whether or not it provides the described characteristics.

This document is not to be construed as a contract. It does not create an obligation on the part of BellSouth Telecommunications or the Competitive Local Exchange Carriers to perform any modification, change or enhancement of any product or service.

Nothing contained herein shall be construed as conferring by implication, estoppel or otherwise, any license or right under any patent, whether or not the use of any information herein necessarily employs an invention of any existing or later issued patent.

VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1 Section 8 Section 11	- Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1 Section 2	- Added "testing" under process changes - Clarification provided in "Change Review

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of BellSouth and CLEC Representatives.

			Participants" description.
		Section 4	- Added statement regarding submittal of Change Requests
		Part 2	- Clarification provided for documentation changes for business rules
			- Step 2-Added email notification
			- Step 3-Removed "Cancellation by BellSouth"
			- Step 3-Clarification on reject reasons
		Section 5	- Step 3-Clarification on internal validation activities
			- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround
			- Added defect implementation range
		Section 6	- Changed prioritization from "by interface" to "by category"
			- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days
			- Modified the prioritization voting rules
		Section 7	- Updates to the Introduction and Retirement of Interfaces
		Section 8	- Added Type 6 escalation turnaround time
			- Changed 3rd Level Escalation contacts for Types 2-6
		Section 11	- Removed "Cancellation by BellSouth" and "Defect Cancelled" definitions
		Appendix A	- Removed "Cancellation by BellSouth" from Change Request Form and Checklist
			- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.
		Appendix D	- Added BellSouth Versioning Policy

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

		All	Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover	- Removed "Interim" from cover.
		Section 3	- Updated Type 6 definition to incorporate new defect and expedited feature definitions.
		Section 5	- Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort.
		Section 10	- Added Internet Web sites for EDI and TAG Testing Guidelines
		Section 11-Terms & Definitions	- Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts.
		Appendix A	- Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels.
		All	- Referenced the handling of expedites and expedite notification where appropriate.

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

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, training materials and job aids)
- Defects/Expedites

The scope of the Change Control Process **does not** include the following:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation

~~- Testing Support (i.e. negotiating/coordinating test agreements and dates)~~
~~- Issue Resolution/Questions (i.e. questions associated with interface functionality, interpreting documentation)~~

- Change Requests of this nature will be handled through existing BellSouth processes.

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/
Select "Local Exchange Carriers"
Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also

include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.

Type 6- CLEC Impacting Defects/~~Expedites~~.

A defect is ~~A~~any non-Type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BellSouth has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects. Type 6 changes may **not** be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

~~An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface.~~

The CLEC and/or BellSouth may initiate defect~~these types of~~ changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects/expedites will be handled through the Change Control Process.

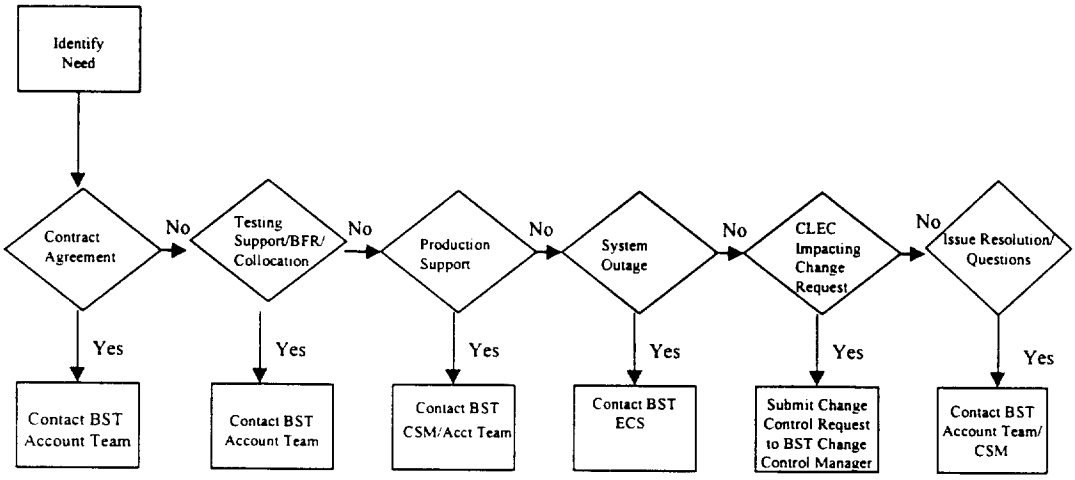

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Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following two sub-sections describe the process flows for typical Type 1 through Type 5 changes. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

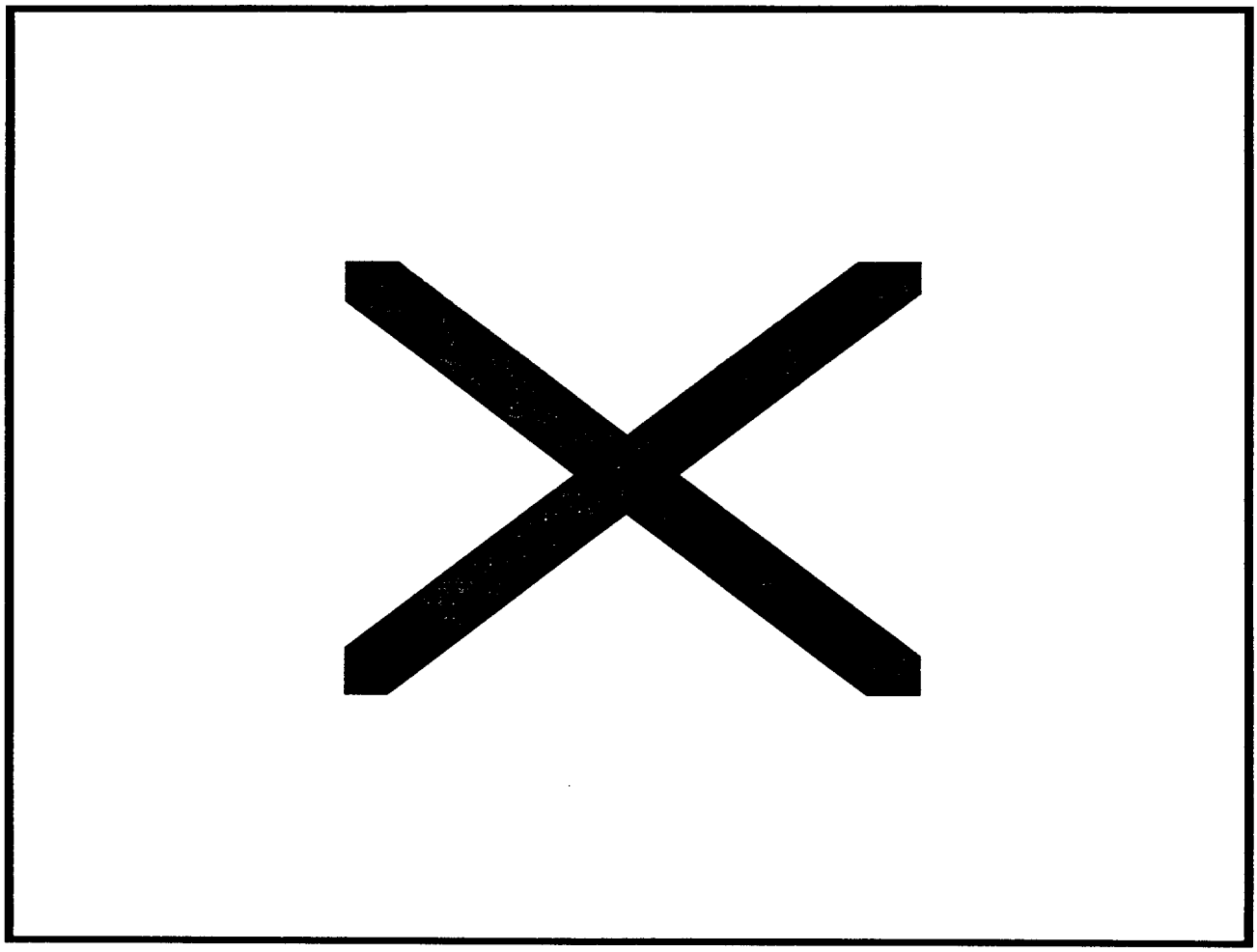

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Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

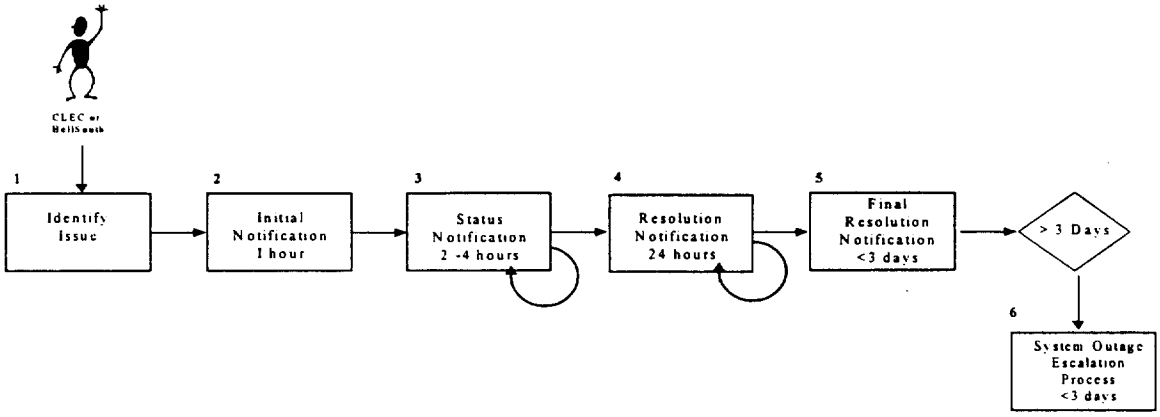


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	**IDENTIFY ISSUE:** 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number and record and track the outage.	**INPUTS:** • Issue Characteristics • Call to ECS Helpdesk **OUTPUTS:** • Recorded Outage	N/A
2	ECS	**INITIAL NOTIFICATION:** 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis. 3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the	**INPUTS:** • Recorded Outage **OUTPUTS:** • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		posted to the web.
3	ECS	**STATUS NOTIFICATION:** **(ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	ECS CCCM	**RESOLUTION NOTIFICATION:** **(ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect/expedite, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
5	ECS	**FINAL RESOLUTION NOTIFICATION:** 1. The final resolution notification is posted on the Web.	**INPUTS:** • Final Resolution Information **OUTPUTS:** • Final Resolution Notification	< 3 days
6	CCCM ECS	**ESCALATION** 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	**INPUTS:** • Information or concern relating to a Type 1 - Systems Outage **OUTPUTS:** • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

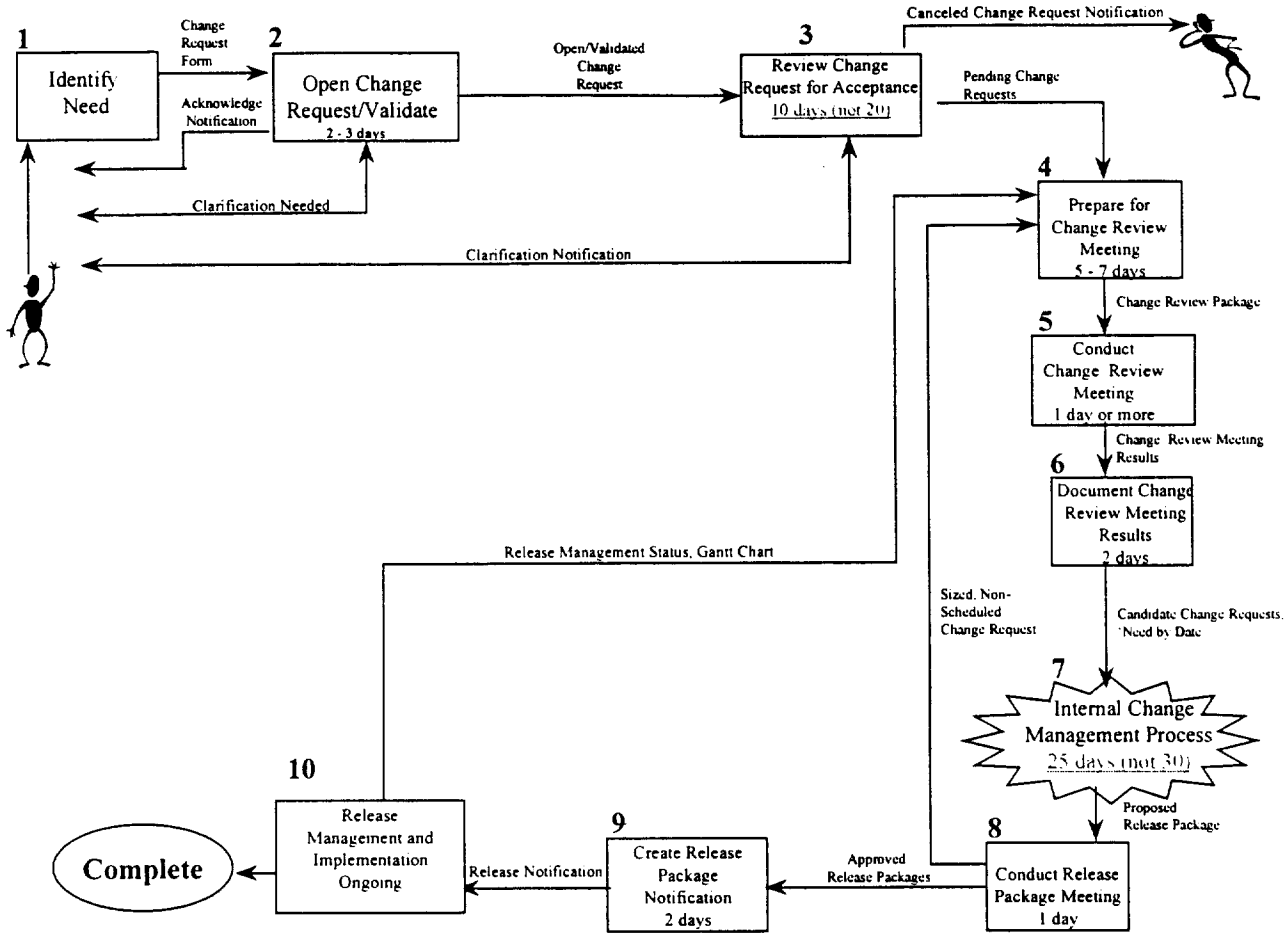


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- Final Software Release ~~Notifications~~ requirements and specifications will be provided 30 calendar days or more in advance of the implementation date.
- Draft requirements and specifications for software releases or systems modifications will be provided to CLECs 90 calendar days or more in advance of the implementation data.
- All additions and changes to any BellSouth ~~D~~documentation changes that do not impact CLEC software, ~~for~~ including business rules changes, will be provided to CLECs 30 calendar days or more in advance of implementation date.

~~CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.~~

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE**	**INPUTS:** • Completed Change Request	2-3 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		REQUEST FOR COMPLETENESS 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	Clarification times would be in addition to cycle time.
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists ~~or training issue~~ forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled ~~or 'CT' for Training. If Training issue, refer to CSM or Account Team~~. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	~~20~~ 10 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Change Request status to "P" for Pending in Change Request Log. **NOTE**: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth feels that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is believed not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. With input from other participating CLECs, and subsequent to BellSouth's presentation, BellSouth and the originating CLEC will determine the disposition of the request. BellSouth shall consider all possible options for accommodating the request. ~~4. BST may reject the change request based on the following reasons: cost, industry direction or technically not feasible to implement and will provide notification to the originating party.~~ ~~Prior to rejecting a request, all options for accommodating the request will be exhausted. The rejection reason will be shared with the CLECs for input.~~ ~~NOTE: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two week advance notice to participate in upcoming Monthly Status Meeting.~~		
4	BCCM CCCM	PREPARE FOR CHANGE REVIEW MEETING NOTE: These activities take place to prepare for Change review meetings when	INPUTS: • Pending Change Request Notifications • Project Release Status	5-7 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		prioritizations take place. **BCCM** 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. **CCCM** 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting.	(Step 10) • Change Request Log **OUTPUTS:** • Change Request Log • CLEC Draft Priority List	
5	BCCM CCCM	**CONDUCT CHANGE REVIEW MEETING** **Monthly Status Meetings** 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects/expedites) at monthly status meeting. 3. Review current Release Management statuses. 4. Review issues and action items and assign owners. **Prioritization Meetings ~~(held as needed based on published release schedule)~~(held quarterly in March, June, September and December)** 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. Discuss Impacts. 4. Prioritize Change Requests. 5. Develop final Candidate Requests list of Pending Change Requests by	**INPUTS:** • Change Request Log • CLEC Draft Priority List • Desired/Want Dates • Impact analysis **OUTPUTS:** • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items (if required)	1 Bus Day (or as needed based on volume) Meeting Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		category, 'Need by Dates' and prioritized Change Requests. 6. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 7. Review issues and action items and assign owners.		
6	BCCM	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities ~~only~~ to the Candidate Change Requests ~~that meet the criteria established by the Internal Change Management Process~~. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for each future release. 3. All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.	**INPUTS:** • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log **OUTPUTS:** • BellSouth's Proposed Release Package (s) • CLEC analysis.	~~30~~ 25 Bus Days
8	BCCM CCCM	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule.	**INPUTS:** • BellSouth's Proposed Release Package (s) • BellSouth's Release Schedule	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~4.Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process.~~ ~~5.~~4. Based on BST/CLEC consensus create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability. ~~6.~~5. Identify Release Management Project Manager, if possible. ~~7.~~6. Establish date for initial Release Management Project Meeting for newly established releases. ~~8.~~7. All Change Requests that are in the approved scheduled release (s) will be changed to "S" status for "Scheduled".	• Change Request Log • CLEC analysis **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests ~~Non-Scheduled Change Requests (Return to Step 4)~~ • Date for initial Release Management Project Meeting for newly established releases.	
9	BCCM	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package (s) **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements for software changes will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. • Draft Specifications and	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Draft Specifications and Requirements • Final Specifications and Requirements	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Requirements will be provided NLT 90 days in advance of Implementation. • Final Specifications and Requirements will be provided NLT 30 days in advance of Implementation. • Implementation will occur NLT 6 months from the date of the prioritization of each change request. 4. BellSouth Documentation changes, including business rule changes will be provided. • All such changes will be provided NLT 30 days in advance of Implementation. • Implementation will occur NLT 90 days from the date of the prioritization of each change request. ~~4.~~5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	• Documentation Changes • Implemented Change Request	

Part 33 – Types 2-5 Exception/Expedited Feature Process

Situations may arise from time to time that require exception treatment for Type 2-5 changes or a Type 6 Defect Change that has been reclassified as a feature change request. An expedited feature request is made to correct the inability of a CLEC to process certain types of orders to BellSouth due to a lack of programming on BellSouth's side of the interface. An exception may involve the extension of the normal intervals for the implementation of a Type 2-5 change.

These situations will be addressed using the following Exception/Expedited Feature Process. As each situation will likely be unique, this process provides the framework in which the CCP members will make the necessary consensus decisions to achieve implementation of the feature in an exception/expedited manner.

Figure 4-4 provides the process flow for the validation and resolution of a Type 2-5 Exception/Expedited Feature Change.

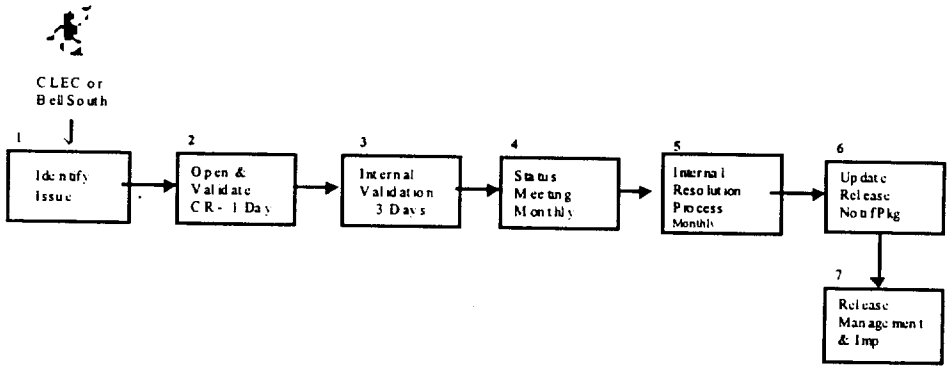


Figure 4-4. Type 2-5 Exception/Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 2-5 Exception/Expedited Feature Process. This process will be used to validate exceptions/expedites, provide status notification(s) and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table –4-4. Type 2-5 Exception/Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Identify Exception/Expedite. 2. Originator and CCCM or BCCM complete the standardized Change Request Form indicating that it is an Expedite Candidate. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments should include the following, if available: • PON • OCN • Specific scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 2-5 Change Request • Reclassified Type 6 Change Request • Exception/Expedited Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE EXPEDITE FORM FOR COMPLETENESS** 1. Log Exception/Expedite in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC.	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:**	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~2.~~3. Establish CR status ('N' for New Exception/Expedite). ~~3.~~4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist. ~~4.~~5. Verify specifications and related information exists. ~~5.~~6. Send Clarification Notification via email to the originator if needed. ~~6.~~7. Update CR Status to' PC' for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.	• New Exception/Expedite • Acknowledgment Notification • Clarification Notification (if required)	
3	BCCM	**INTERNAL VALIDATION** 1. Validate that it is an Exception/Expedite. 2. Perform internal exception/expedite analysis. 3. Determine status of request: • If request duplicates existing change request, forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled . • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Exception/Expedite and indicate appropriate Impact Level. • If issue does not qualify for exception/expedited treatment, re-classify as a standard feature change, provide supporting information via	**INPUTS:** • New Exception/Expedite **OUTPUTS:** • Validated Exception/Expedite • Exception/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	3 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		email to the originator for review and feedback. The Change Request will exit the exception/expedite process flow and enter Types 2-5 normal process flow at Step 3. **NOTE**: See Section 11.0 Terms and Definitions – Expedite Status for valid status codes and descriptions. Exception/Expedite notification will be provided to CLEC community via e-mail and web posting.		
4	**BCCM** **CCP Members**	**MONTHLY STATUS MEETING** 1. Provide status of Excpetion/Expedite. 2. Solicit CLEC/ BST input. 3. Reach consensus as to disposition. 4. Update Exception/Expedite information as needed.	**INPUTS:** • Exceptions/Expedites Received • Change Request Log • Exception/Expedite Analysis **OUTPUTS:** • Updated status • Updated Change Request Log • Meeting minutes	Monthly or when status changes, whichever occurs first.
5	**BCCM**	**INTERNAL RESOLUTION PROCESS** 1. Schedule and evaluate Exceptions/Expedites based on capacity and business impacts to the CLECs and BellSouth. 2. Provide status updates to the CLEC community via email as the status changes until the exception/expedite is implemented. Exceptions will be implemented in the release determined by the consensus reached in Step 4. Expedites will be implemented in the current, next release, or point release, best effort, as determined by the consensus of the CCP Members at the Monthly Status Review Meeting.	**INPUTS:** • CLEC/ BST input **OUTPUTS:** • Excpetions/Expedites Release Schedule	Monthly or when status changes, whichever occurs first.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
6	BCCM	**UPDATE RELEASE PACKAGE NOTIFICATION** 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". Note: The release notification will be published in a timely manner, based on the release constraints associated with the expedite.	**INPUTS:** • Exception/Expedite Feature Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for expedites (may be less than 30 days).
7	BCCM	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 2-5 Exception/Expedited Feature changes: 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 2. BellSouth business requirements will be presented to CLECs for expedited features (if applicable). If needed, changes will be incorporated and requirements re-baselined. 3. Once an Exception/Expedited Feature Change is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

5.0 DEFECT/EMERGENCY CHANGE/~~EXPEDITE~~ ~~NOTIFICATION~~ PROCESS

A CLEC/BST identified defect/emergency change~~expedite~~ will enter this process through the Change Management Team as a Type 6 Change Request. If the defect ~~/expedite~~ is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

CLEC Notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

A **defect** is any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

~~An **expedited feature** is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.~~

~~Type 6~~Defect Change Requests will have three Impact Levels:

- **High Impact**

  The failure causes impairment of critical system functions and no electronic workaround solution exists.

  ~~Expedited features will be treated as High Impact.~~

- **Medium Impact**

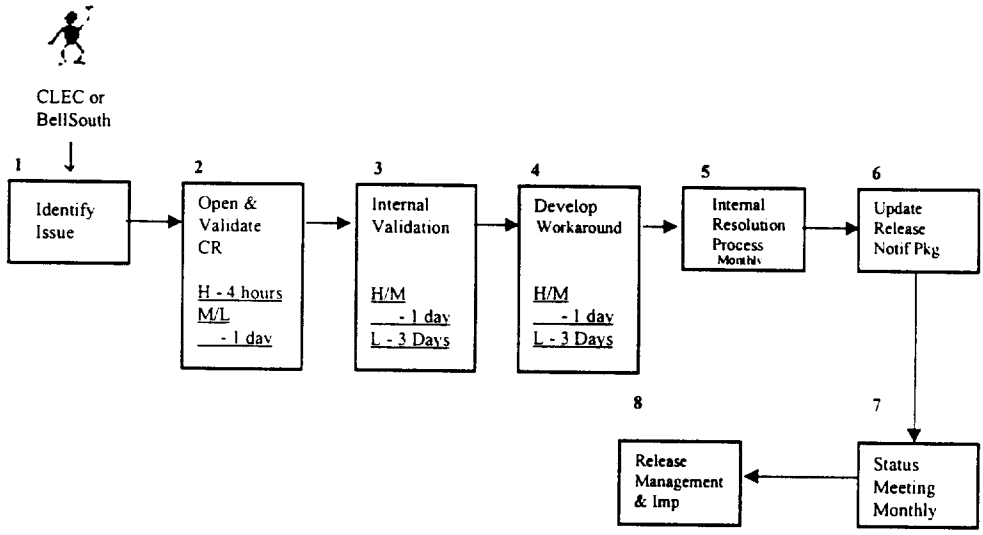
  The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

  The failure causes inconvenience or annoyance.

Defect Changes identified as High Impact are referred to as **Emergency Changes**. CLECs encountering High Impact defects outside normal business hours (7am – 6pm Eastern) will submit their requests to the Electronic Communications Support (ECS) Group. The ECS Helpdesk number is 888-462-8030.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect/Emergency Change/~~Expedite~~.



~~**Note**: Step 4 (Develop Workaround) does not apply for High Impact Expedites.~~

[NOTE: The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.]

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects~~/expedites~~, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** ~~1.~~2. Identify Defect~~/Expedite~~. ~~2.~~5. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. ~~3.~~6. Include description of business need and details of business impact. ~~4.~~7. Attach related requirements and specification documents. These attachments should include the following, if available: • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 6 Change Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE DEFECT/EXPEDITE FORM FOR COMPLETENESS** 1. Log Defect/Expedite in Change Request Log. ~~2.~~8. Send Acknowledgment Notification via email to initiating CLEC. ~~2.~~9. Establish CR status ('N' for New Defect/Expedite). ~~3.~~10. BCCM reviews change request for	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:** • New Defect/Expedite • Acknowledgment Notification • Clarification Notification (if required)	4 hours for High Impact 1 Bus Day for Medium and Low Impact

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		mandatory fields using the Change Request Form Checklist. ~~4.~~ 11. Verify specifications and related information exists. ~~5.~~ 12. Send Clarification Notification via email to the originator if needed. ~~6.~~ 13. Update CR Status to' PC' for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.		
3	BCCM	INTERNAL VALIDATION ~~1.~~4. Validate that it is a defect/expedite. ~~2.~~5. Perform internal defect/expedite analysis. ~~3.~~6. Determine status of request: • If change already exists ~~or training issue~~ forward Cancellation Notification to CCCM or BCCM and update status to 'C' ~~for Request Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team~~. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect/Expedite and indicate appropriate Impact Level. ~~Note: High Impact Expedites will skip Step 4 (Develop Workaround) and be scheduled for the current, next release, or point release, best effort.~~ • If the process is operating as specified in the baselined requirements and	INPUTS: • New Defect/Expedite OUTPUTS: • Validated Defect/Expedite • Defect/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	1 Bus Day for High and Medium Impact 3 Bus Days Low Impact

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s). • If issue is re-classified as a standard feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect/~~expedite~~ process flow and enter Types 2-5 process flow (enter at Step 3). **NOTE**: See Section 119.0 Terms and Definitions – Defect/~~Expedite~~ Status for valid status codes and descriptions. Defect/~~Expedite~~ notification will be provided to CLEC community via e-mail and web posting.		
4	BCCM	**DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)** 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via e-mail and web posting.~~.~~ 4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. ~~Defect workaround notification will be provided to CLEC community via e-mail and web posting.~~ If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.	**INPUTS:** • Validated Defect • Clarification Notification (if required) **OUTPUTS:** • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • E-mail and web posting of workaround	~~4 Bus Days~~ 1 Bus Day for High and Medium Impact 4 Bus Days for Low Impact
~~5~~	~~BCCM~~	~~**MONTHLY STATUS MEETING**~~ ~~1.Provide status of Defect/Expedite.~~ ~~2.Solicit CLEC/ BST input.~~	~~**INPUTS:**~~ ~~Defects/Expedites Received~~ ~~Change Request Log~~	~~Monthly or when status~~

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~3.Update Defect/Expedite information as needed.~~	~~Defect/Expedite Analysis~~ ~~Workaround (if applicable)~~ ~~OUTPUTS:~~ ~~Updated status~~ ~~Updated Change Request Log~~ • ~~Meeting minutes~~	~~changes, whichever occurs first.~~
56	BCCM	INTERNAL RESOLUTION PROCESS ~~1.~~3. Schedule and evaluate Defects/~~Expedites~~ based on capacity and business impacts to the CLECs and BellSouth. ~~2.~~4. Provide status updates to the CLEC community via email as the status changes until the defect/~~expedite~~ is ~~scheduled~~implemented. ~~NOTE: Validated defects (High Impact) will be implemented within a 4 – 25 business day range, best effort.~~ ~~Expedites (High Impact) will be implemented in the current, next release, or point release, best effort.~~	INPUTS: • CLEC/ BST input OUTPUTS: • Defect/~~Expedites~~ Release Schedule	~~Monthly or when status changes, whichever occurs first.~~ Validated High and Medium Impact defects will be implemented within a 4 – 10 business day range, best effort. Low Impact defects will be implemented within a 4 – 20 business day range, best effort.
67	BCCM	UPDATE RELEASE PACKAGE NOTIFICATION ~~1.~~3. Update and distribute release notification package via web. ~~2.~~4. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".	INPUTS: • Defect/~~Expedite~~ Feature Information OUTPUTS: • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for defects/~~expedite~~s (may be less than 30 days).

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Note: The release notification will be published in a timely manner, based on the release constraints associated with the defect/expedite.		
7	BCCM	MONTHLY STATUS MEETING 5. Provide status of Defect. 6. Solicit CLEC/ BST input. 7. Update Defect/Expedite information as needed.	INPUTS: • Defects/Expedites Received • Change Request Log • Defect/Expedite Analysis • Workaround (if applicable) OUTPUTS: • Updated status • Updated Change Request Log Meeting minutes	Monthly or when status changes, whichever occurs first.
8	BCCM	RELEASE MANAGEMENT AND IMPLEMENTATION The following release management activities will pertain to Type 6 changes: ~~1.~~4. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. ~~2.~~5. BellSouth business requirements will be presented to CLECs for expedited features (if applicable). If needed, changes will be incorporated and requirements re-baselined. ~~3.~~6. Once a defect~~/expedite~~ is implemented in a release, the status will be changed to "I" for Change Implemented.	INPUTS: • Approved Release Package Notification OUTPUTS: • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT AND APPROVAL

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be scheduled to coincide with the published release schedules. For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to ~~coincide with the published release schedules~~occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)

- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish "desired/want" dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- ~~Manual processes and d~~Documentation changes will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- ~~Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached~~
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

Part 4 – Developing and Approving Release Packages

Subsequent to the Change Review Meeting BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held 25 business days later.

- Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints for each future release have been reached.
- All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.

During the Release Package Meeting BST/CLEC consensus will be used to create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability.

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth Originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as possible. ~~A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30 – 45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community.~~ BellSouth will provide specifications on the interface being developed to the CLEC Community using the timeframes established in Part 4, Section 2. As new interfaces are deployed, they will be added to the scope of this document ~~document as appropriate, based on the use by the CLEC community~~ and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.
- For Type 6 High and Medium Impact issues, the escalation process is agreed to allow BellSouth a ~~three~~one-day turnaround to provide a status for each cycle of escalation.
- For Type 6 Low Impact and Type 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three-day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications will be ~~may be optionally~~ distributed by Change Control~~the CLEC~~ to the industry via ~~and BellSouth Change Control~~ e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Susan Hart Manager - EC Support Group Interconnection Operations	205-733-5393	1-800-946-4646 PIN 1436470	Susan.K.Hart@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
  - Definition and escalation of item.
  - History of item.
  - Reason for escalation.
  - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Type 2-5 Changes: ~~W~~within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6, High and Medium Impact Changes: Within 1 business day of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6 Low Impact and Type 2-5 Expedite Changes: Within 3 business days of receipt (2 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Sales Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Linda Tate Director (for Systems Issues)	404-927-7878	Linda.Tate3@bridge.bellsouth.com
	Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7828	Joy.A.Lofton@bridge.bellsouth.com
3rd Level	Doug McDougal Senior Director (for Systems Issues)	404-927-7505	Doug.Mcdougal@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business	404-927-3545	Dee.Freeman2@bridge.bellsouth.com

	Rules/Operations Issues)		

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including escalation within each company to the person with ultimate authority for Change Control operations, and the services of a Joint Investigative Team when appropriate, BellSouth and the impacted CLEC(s) agree as follows:

~~to follow this Dispute Resolution Process. BellSouth and the CLEC shall assemble a Joint Investigative Team, within one week, comprised of subject matter experts. The party prompting the dispute should initiate the formation of the team. The team should be co-chaired by representatives of BellSouth and the CLEC respectively. The investigative team will conduct a root-cause analysis to determine the source of the problem, if one exists, and then develop a plan for remedying it. The parties to the dispute must escalate the issue within each company to the person who has ultimate authority for State operations in an effort to achieve a resolution.~~

~~If the dispute cannot be resolved between the companies after these steps are taken, then either party to the dispute may file a formal complaint with the State PSC through the Director of the Telecommunications section for binding mediation. The Director of the Telecommunications section, or his appointee, shall rule upon the complaint within 30 days of its filing. If either party is then aggrieved, it may file a formal complaint with the State PSC.~~

- Either party to the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, both parties shall participate in good faith.
- Either party may file a formal complaint with the State PSC, requesting resolution of the issue, without necessity for prior mediation.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. Following this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution. The official ballot will detail the change being requested, and the significant arguments presented for and against the change during the review. The ballot will be distributed one week following the Status Meeting. CLEC's and BellSouth will have one week in which to cast their vote. Only ballots transmitted before midnight of the due date will be counted. Implementation of such changes will require a two-thirds affirmative vote for approval. ~~All changes will be submitted as a change request and reviewed~~.

10.0 TESTING ENVIRONMENT

Requests related to the processes of testing an interfaces will be included in the Change Control Process. Changes to BellSouth's testing environments and supporting processes will be submitted through the Change Control Process as a Type 5 request. The requests will follow the guidelines and intervals set forth in the Type 5 process flow.

BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.

BellSouth will also provide a pre-release testing environment for TAG and EDI that will be available to CLEC's 30 days **prior** to the implementation of any new releases. This environment will be a wholly separate, non-production environment for all preordering and ordering interfaces and will mirror the production environment.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, refer to the following BellSouth public Internet sites:

EDI

www.interconnection.bellsouth.com/markets/lec.html
Select "Customer Guides"
Select "Local Exchange Ordering Guides"
Select "BellSouth EDI Specifications – TCIF 9"
Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html
Select "OSS Information Center"
Select "TAG Documentation"

This site is password protected. You should obtain the password from your Account Team representative.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing Change Requests and defects/expedites.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
  - ◊ Dependencies relative to other data elements
  - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: BST cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects/expedites or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- Type 2-5 – Expedited Feature Change. Any Type 2-5 change that either BellSouth or a CLEC submits for exception handling in order to achieve a more rapid implementation.
- Type 6 – CLEC Impacting Defect. Any non-Type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

~~Type 6 – CLEC Impacting Expedite. The ability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.~~

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.

~~**CT = Training.** Requested change already exists, additional training may be required.~~

- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).
- **D** = Request Purge. Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).

- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled.** Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

Defect/Expedite Status. The status of a CLEC Impacting Defect/Expedite Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
  - **CD = Duplicate Request.** A request for this change already exists.

~~**CT = Training.** Requested change already exists, additional training may be required.~~
- **I = Implemented.** Indicates a Defect/Expedite Change Request has been implemented in a release (Step 6).
- **N = New Defect/Expedite Change Request.** Indicates a Defect/Expedite Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect/Expedite Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect/Expedite.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Emergency Change. Defect Changes identified as High Impact are **emergency changes.**

Exception Change. An exception change request may involve the extension of the normal intervals for the implementation of a Type 2-5 change.

Expedited Feature. An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a lack of programming ~~problem~~ on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect/Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

Transmittal Cover Sheet for Pate Exhibit RMP-17

This sheet transmits the

October 27, 2000 CCP Process Review Meeting Minutes
(Provided by AT&T to all CCP Participants – Confidential/Proprietary)

which consists of 3 pages.

Change Control Process Review Meeting
October 27, 2000

Attendees:
Anthony Zerillo, Birch Telecom
Valerie Cottingham, BellSouth
Cheryl Story, BellSouth
Tyra Hush, WorldCom
Christin Hudson, XO Communications
Rae Dupraw, Empower
Sherian Lively, Trivergent
Jill Williamson, AT&T
Jay Bradbury, AT&T
Steve Murray, Rhythms
Tammi Swinson, Anderson Consulting
Sandy Evans, Sprint
Peggy Rehm, Nightfire
Bill Grant, Telcordia
Kate Cooper, EFTIA
Mary Conquest, ITC Deltacom

Jill began the meeting by grouping the changes in the redlined document into 8 major categories:

1. Defect/Expedite
2. Prioritization
3. New Interfaces / Retirements
4. Escalation
5. Dispute Resolution
6. Changing the Process
7. Testing Environment
8. Milestones and Notifications

1. Defects/Expedites

The present definition is:

> **Defect.** Any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

The CLEC's agreed that that this definition does not adequately cover the scope of a defect. An interface can be working per baseline business requirements and in accord with published documentation and still not provide the CLEC with a usable process. Tyra (WorldCom) suggested some additional language to be incorporated into the current

definition - - or where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data. (insert on page 34)

The CLECs indicated they were in agreement with all of the other changes proposed related to D/E on pages 29-41.

The number in the Develop Workaround box on page 36 for the L interval, should be 4 days, not 3.

Valerie (BellSouth) expressed a concern about the Step 3 item on page 31 "If request is valid, update Change Request status to 'V' for Validated Exception/Expedite and indicate the appropriate Impact Level." The team agreed to drop "and indicate the appropriate Impact Level" as this does not apply in our proposed process - impact levels will only apply to defects.

Valerie also requested clarification on page 38 (in Step 3) about the strike of "If training issue, refer to CSM or Account Team." The agreed upon change was "If there is a CLEC training issue, refer the request to CSM or Account Team."

On page 39 (in Step 3) the CLECs suggested an additional Sub-process Activity bullet:

- If a change request is reclassified from feature change to defect (either initially, or after having been reclassified from defect to feature change) it will enter the process at Step 4 and be subject to the interval guidelines stated there.

2. Prioritization

The CLECs indicated they were in agreement with AT&T's proposed changes on pages 42-44, and 25-27. In addition the CLECs suggested that BellSouth could provide more valuable information in advance of the Change Review Meetings that would enhance the CLEC's prioritization voting. These items included:

Order of magnitude sizing estimates
Remaining capacity available in future releases, etc.

These would appear as additional bullets on page 43 and on page 25 (step 4 & 5).

3. New interfaces / Retirements

There was discussion of voting/not-voting on new interfaces when submitted as type 4 (BLS) or type 5 (CLEC) - there will be no voting on a type 4 and there will be voting on the introduction of new interfaces for Type 5 requests. If a CLEC wants to avoid voting on a Type 5, it should submit the request through its Account Team or as a BFR. It was agreed BLS could make new interface introductions at any monthly status meeting.

Regarding retirements, BellSouth agreed to submit them as Type 4 changes.

The CLECs agreed to add a paragraph on the retirement of a "version" of an interface/software. The purpose would be to provide intervals and parameters for the submission and implementation of a new software version.

4. Escalation

The CLECs agreed with the proposed changes in the revised CCP document.

BellSouth wanted a reversion to the original language for the last bullet on page 46 - CLECs agreed.

5. Dispute Resolution

The CLECs indicated agreement with the proposed changes.

6. Changing the Process

The CLECs indicated agreement with the proposed changes.

7. Testing Environment

The CLECs indicated agreement with the proposed changes.

8. Milestones and Notifications

The milestones and notification language was changed to distinguish between documentation changes, changes to existing functionality and upgrade of software versions.

Other

On Page 7, training material examples - Class on how to file an LSR / Web TAFI / Web LENS / Training vs. M&Ps / (BellSouth manages training separately from M&P development)

Add a Testing Processes bullet on page 8; BellSouth to clarify their Testing Support bullet

Change order of bullets 2,1,3 on page 22 - show 45 days for Final Software requirements & specifications (change to 45 days on page 28 also)

The CLECs accepted BellSouth's request for a two-week notice to have SMEs at Monthly Status Meetings (page 24)

Transmittal Cover Sheet for Pate Exhibit RMP-18

This sheet transmits the

CCP Document, Version 2.0, with BellSouth's Proposed Changes

which consists of 83 pages.

BELLSOUTH

CHANGE CONTROL PROCESS

CCP8_23.DOC

VERSION 2.0

~~AUGUST 23~~OCTOBER 27, 2000

DECEMBER 5, 2000

Issued: 10/27/00 ~~9/15/00 8/23/00~~ 12/05/00

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

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

This document is not to be construed as a suggestion to any manufacturer to modify or change any of its products, nor does this document represent any commitment by BellSouth Telecommunications to purchase any product whether or not it provides the described characteristics.

This document is not to be construed as a contract. It does not create an obligation on the part of BellSouth Telecommunications or the Competitive Local Exchange Carriers to perform any modification, change or enhancement of any product or service.

Nothing contained herein shall be construed as conferring by implication, estoppel or otherwise, any license or right under any patent, whether or not the use of any information herein necessarily employs an invention of any existing or later issued patent.

VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1 Section 8 Section 11	- Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1 Section 2	- Added "testing" under process changes - Clarification provided in "Change Review

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of BellSouth and CLEC Representatives.

			Participants" description.
		Section 4	- Added statement regarding submittal of Change Requests
		Part 2	- Clarification provided for documentation changes for business rules
			- Step 2-Added email notification
			- Step 3-Removed "Cancellation by BellSouth"
			- . Step 3-Clarification on reject reasons
		Section 5	- Step 3-Clarification on internal validation activities
			- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround
			- Added defect implementation range
		Section 6	- Changed prioritization from "by interface" to "by category"
			- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days
			- Modified the prioritization voting rules
		Section 7	- Updates to the Introduction and Retirement of Interfaces
		Section 8	- Added Type 6 escalation turnaround time
			- Changed 3rd Level Escalation contacts for Types 2-6
		Section 11	- Removed "Cancellation by BellSouth" and "Defect Cancelled" definitions
		Appendix A	- Removed "Cancellation by BellSouth" from Change Request Form and Checklist
			- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.
		Appendix D	- Added BellSouth Versioning Policy

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

		All	Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover	- Removed "Interim" from cover.
		Section 3	- Updated Type 6 definition to incorporate new defect and expedited feature definitions.
		Section 5	- Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort.
		Section 10	- Added Internet Web sites for EDI and TAG Testing Guidelines
		Section 11-Terms & Definitions	- Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts.
		Appendix A	- Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels.
		All	- Referenced the handling of expedites and expedite notification where appropriate.

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

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, training materials and job aids)(BellSouth cannot support)
- Defects/Expedites

The scope of the Change Control Process **does not** include the following:

The scope of the Change Control Process does not include the following which are handled through existing BellSouth processes:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- ~~Testing Support (i.e. negotiating/coordinating test agreements and dates)~~(Agree to remove)
- ~~Issue Resolution/Questions (i.e. questions associated with interface functionality, interpreting documentation)~~(Agree to remove)
- Coordination of test agreements will continue to be supported by the Account Team(Agree to accept)
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a Change Request should be submitted to the Change Control Team.(Agree to accept)

- Change Requests of this nature will be handled through existing BellSouth processes.(Revised and accepted above)

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/
Select "Local Exchange Carriers"
Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.(Does not apply to Expedited Feature process)

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.(Does not apply to Expedited Feature process)

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also

include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.(BellSouth Agrees)

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.(BellSouth Agrees)

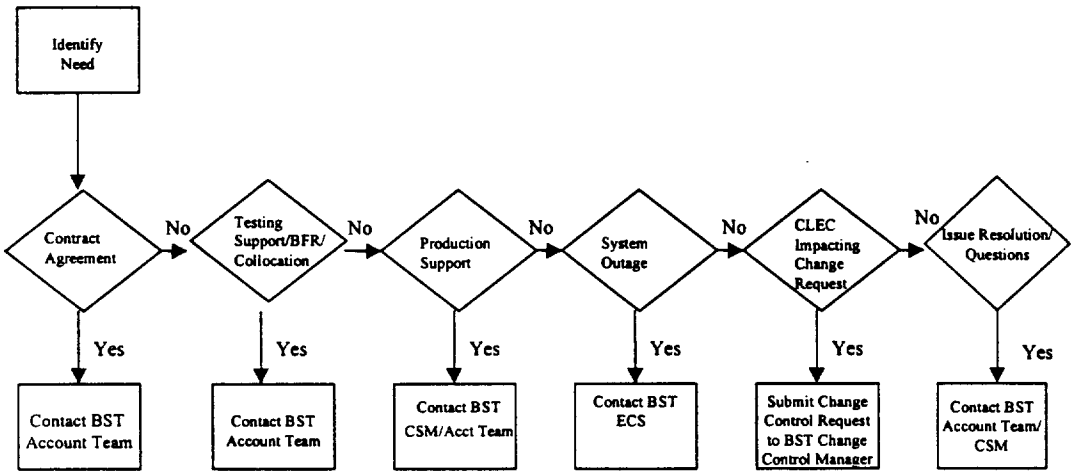
Type 6- CLEC Impacting Defects~~/Expedites~~.(Agree to Remove)

A defect is ~~A~~a(agree to add)ny non-Type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BellSouth has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects. Type 6 validated changesdefects may **not** be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

~~An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface.~~(Agree to remove)

The CLEC and/or BellSouth may initiate defect~~these types of~~ (Agree to remove) changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects/expedites will be handled through the Change Control Process.

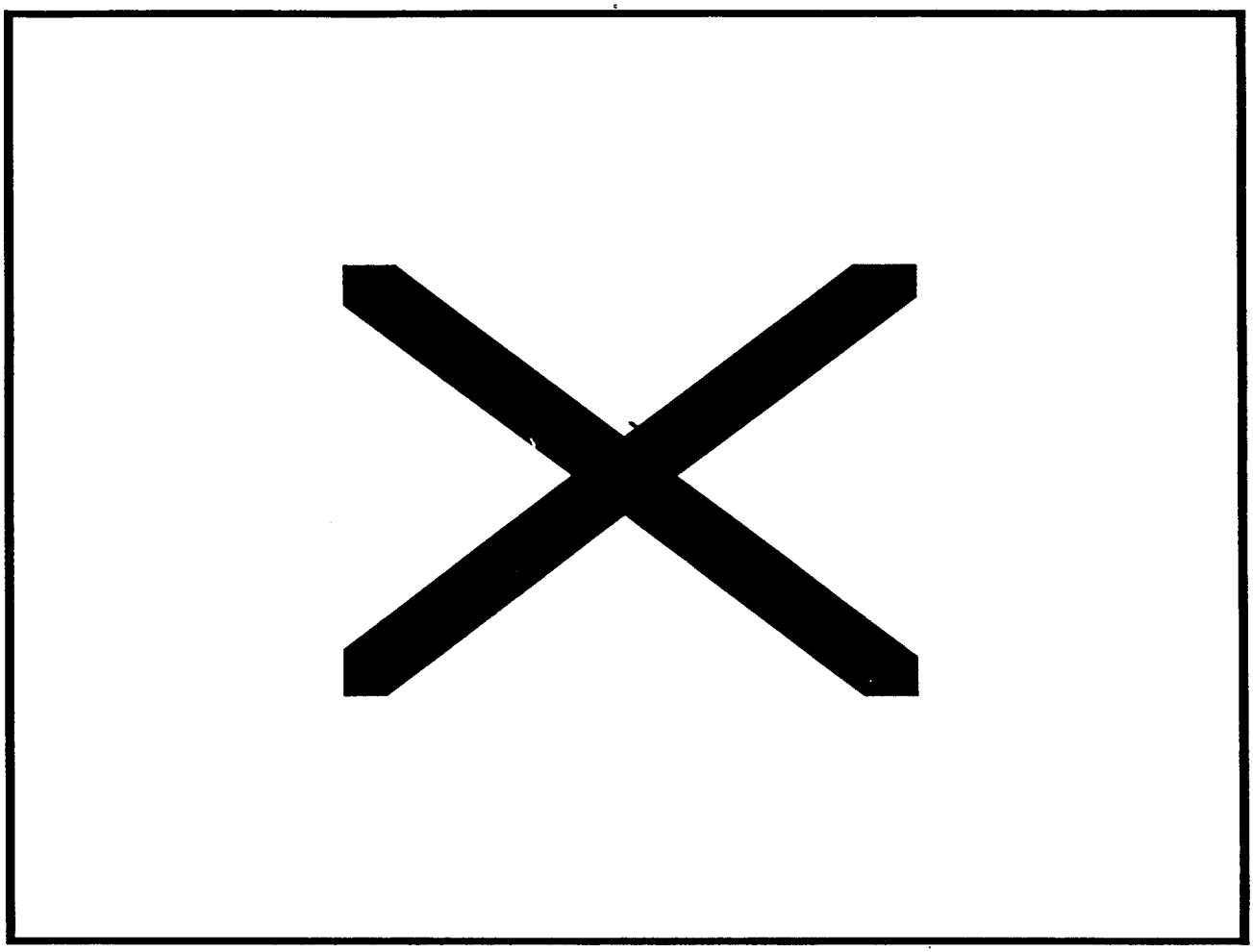


[No change was made to this figure, an error in the revision marking process resulted in its accidental modification/deletion.]

Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following two sub-sections describe the process flows for typical Type 1 through Type 5 changes. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:



[No change was made to this figure, an error in the revision marking process resulted in its accidental modification/deletion.]

Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

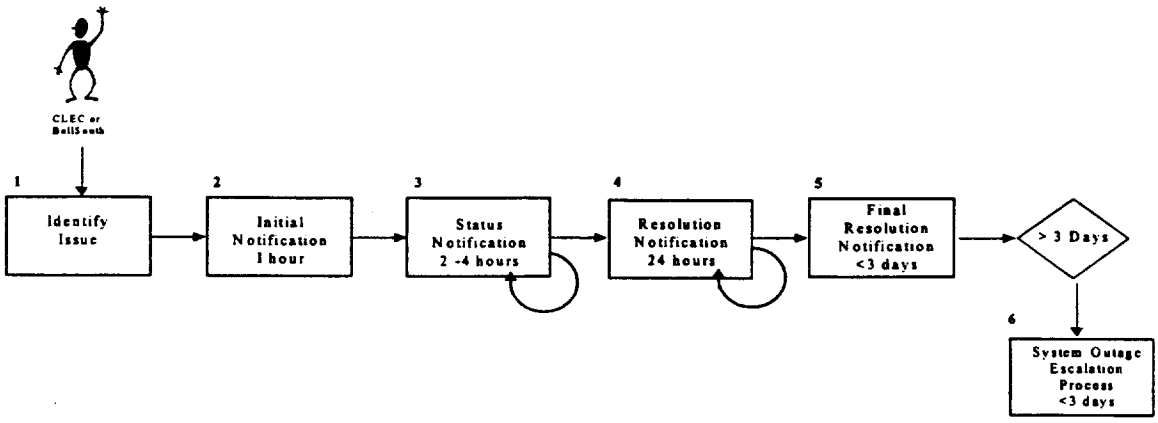


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	**IDENTIFY ISSUE:** 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number and record and track the outage. 4. ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the outage.	**INPUTS:** • Issue Characteristics • Call to ECS Helpdesk **OUTPUTS:** • Recorded Outage	N/A
2	ECS	**INITIAL NOTIFICATION:** 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an	**INPUTS:** • Recorded Outage **OUTPUTS:** • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		as needed basis. 3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		will be sent to CLECs via e-mail and posted to the web.
3	ECS	**STATUS NOTIFICATION:** **(ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	ECS CCCM	**RESOLUTION NOTIFICATION:** **(ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect/expedite, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		created, proceed to Step 5 "Final Resolution Notification".		
5	ECS	**FINAL RESOLUTION NOTIFICATION:** 1. The final resolution notification is posted on the Web.	**INPUTS:** • Final Resolution Information **OUTPUTS:** • Final Resolution Notification	< 3 days
6	CCCM ECS	**ESCALATION** 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	**INPUTS:** • Information or concern relating to a Type 1 - Systems Outage **OUTPUTS:** • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

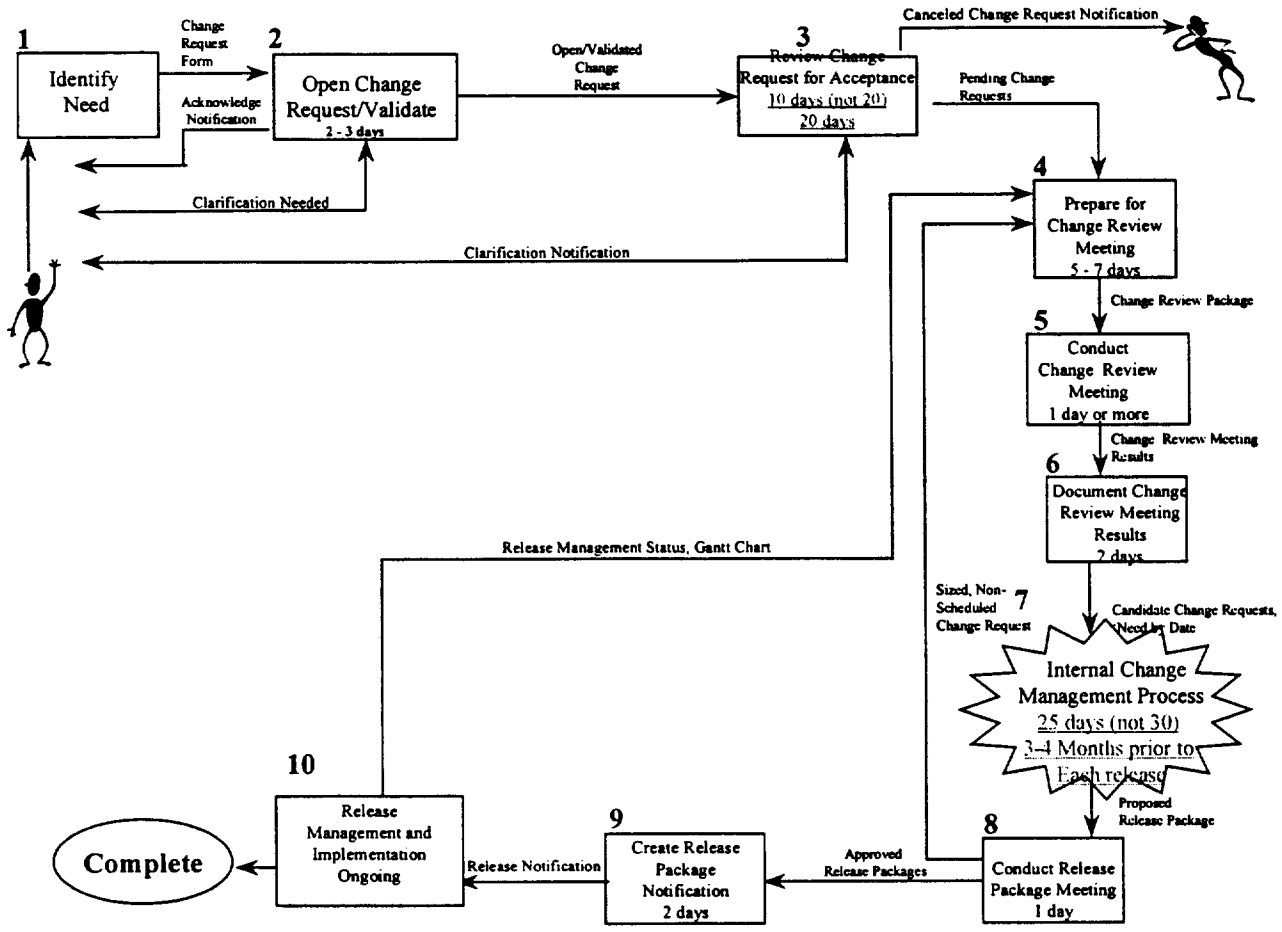


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- For the implementation of new features or modification of current functionality, ~~f~~Final Software Release ~~Notifications~~ requirements and specifications will be provided ~~30~~ 45 calendar days or more in advance of the implementation date.

- For the implementation of new features or modification of current functionality, ~~D~~draft requirements and specifications for software releases or systems modifications will be provided to CLECs 90 calendar days or more in advance of the implementation data.

- For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 calendar days or more in advance of the implementation date.

- All additions and changes to any BellSouth ~~D~~documentation changes that do not impact CLEC software, ~~for~~ including business rules changes, will be provided to CLECs 30 calendar days or more in advance of implementation date.

- Draft user requirements for software releases will be provided to CLECs NLT 90 calendar days in advance of the release implementation date.

- Final user requirements for software releases will be provided to CLECs NLT 45 calendar days in advance of the release implementation date.

- Notification for the implementation of a new TCIF map will be provided NLT 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map NLT 180 calendar days in advance of the release implementation date.

- Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs NLT 120 calendar days in advance of the release implementation date.

- Final user requirements for the implementation of a new TCIF map will be provided to CLECs NLT 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts, BellSouth will distribute the user requirements at least once a month until one (1) month beyond implementation of the new TCIF map.

- All additions and changes to BellSouth business rule documentation will be provided to CLECs NLT 30 calendar days in advance of the release implementation date.

~~CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.~~(Agree to Remove)

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	mail and web posting	
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue ~~or training issue~~(Agree to remove) forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. **NOTE**: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth feels that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is believed not technically feasible to implement, BellSouth will open an agenda item on the next monthly status	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	~~20~~ 10 Bus Days 20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		meeting/call, and will provide a SME on that call to present its case. With input from other participating CLECs, and subsequent to BellSouth's presentation, BellSouth and the originating CLEC will determine the disposition of the request. BellSouth shall consider all possible options for accommodating the request. If BellSouth determines that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. **OBF Issues** All issues that are being actively discussed at OBF or are on the agenda to be discussed will be deferred. If the issue is not active and will not be considered within the next six (6) months, BellSouth will address the issue. ~~4.BST may reject the change request based on the following reasons: cost, industry direction or technically not feasible to implement and will provide notification to the originating party.~~(Agree to Remove) ~~Prior to rejecting a request, all options for accommodating the request will be exhausted. The rejection reason will be shared with the CLECs for input.~~(Agree to Remove) **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Meeting.		
4	BCCM CCCM	**PREPARE FOR CHANGE REVIEW MEETING** NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. **BCCM** 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. 5. Provide size and scope information on each pending change request to CLECs.(Agree to accept) **CCCM** 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting.	**INPUTS:** • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log **OUTPUTS:** • Change Request Log • CLEC Draft Priority List • Size and scope on each Pending change request	5-7 Bus Days
5	BCCM CCCM	**CONDUCT CHANGE REVIEW MEETING** **Monthly Status Meetings** 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects/expedites) at monthly status meeting. 3. Review current Release Management statuses. 4. Review issues and action items and assign owners.(Agree to Accept) 5. Present new change requests submitted since previous Monthly Status Meeting.(Agree to Accept)	**INPUTS:** • Change Request Log • CLEC Draft Priority List • Desired/Want Dates • Impact analysis • Size and scope on each Pending change request **OUTPUTS:** • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items (if required)	1 Bus Day (or as needed based on volume) Meeting Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Prioritization Meetings ~~(held as needed based on published release schedule)~~(held quarterly in March, June, September and December)(Agree to accept) 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. BellSouth presents size and scope of each change request and potential release package combinations. BellSouth presents size and scope of each change request. 4. Discuss Impacts. 5. Prioritize Change Requests. 6. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. 7. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 8. Review issues and action items and assign owners.		
6	BCCM	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities ~~only~~(Agree to remove)~~-~~to the Candidate Change Requests~~ that meet the criteria established by the Internal Change~~	**INPUTS:** • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log **OUTPUTS:** • BellSouth's Proposed	~~30~~ 25 Bus Days 3-4 months prior to each major release. (Interval will

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~Management Process.~~(Agree to Remove) This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for each future release.(Agree to Add: 'for the next release' – Delete: each future release) 3. All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.(Remove – BellSouth cannot support)	Release Package(two scenarios) • CLEC analysis.(Agree to add)	vary as a result of design, construction, and testing efforts.)
8	BCCM CCCM	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. ~~Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process.~~ 4. (BELLSOUTH recommends the following two (2) scenarios: a) Non-scheduled Change Requests will need to be re-prioritized at the next Change Review Meeting along with new pending requests to accommodate changes in the Industry's business requirements. (Return to Step 4) or b) Prioritize only the new "Pending CR's" since the last Change Review Meeting and incorporate rankings into the overall prioritization list. CLECs, based on group consensus, may request re-ranking of all non-scheduled CR's.) 5. Based on BST/CLEC consensus create Approved Release Package	**INPUTS:** • BellSouth's Proposed Release Package (two scenarios). • BellSouth's Release Schedule • Change Request Log • CLEC analysis(Agree to add) **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • ~~Non-Scheduled Change Requests (Return to Step 4~~ (BellSouth cannot support) • Date for initial Release Management Project Meeting for newly established releases.(BellSouth: for	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		(s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability. Based on BST/CLEC consensus determine which scenario should be implemented. Create the Approved Release Package and schedule. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting for newly established releases.(for the next release) 8. All Change Requests that are in the approved scheduled release (s)(Remove) will be changed to "S" status for "Scheduled".	next release – Delete: for newly established releases)	
9	BCCM	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package (s)(Remove) **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements for software changes(Agree to accept) will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. • For new features or changes to existing functionality, ~~D~~draft Specifications and	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Draft Specifications and Requirements • Final Specifications and Requirements • Documentation Changes • Implemented Change	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Requirements will be provided NLT 90 days in advance of Implementation. • Draft User Requirements for software release will be provided to the CLECs NLT 90 calendar days in advance of the release implementation date. • For new features or changes to existing functionality, ~~F~~final Specifications and Requirements will be provided NLT ~~30~~45 days in advance of Implementation. • Final User Requirements for software releases will be provided to the CLECs NLT 45 days in advance of the release implementation date. • For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 days or more in advance of the implementation date • Notification for the implementation of a new TCIF map will be provided NLT 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map NLT 180 calendar days in advance of the release implementation date. • Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs NLT 120 calendar days in advance of the release implementation date. • Final User Requirements for the implementation of a new TCIF map will be provided to CLECs	Request • Draft User Requirements • Final User Requirements • Documentation Changes	

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		NLT 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts, BellSouth will distribute the user requirements at least once a month until one (1) month beyond the implementation of the new TCIF map. • Implementation will occur NLT 6 months from the date of the prioritization of each change request.(BellSouth cannot support) 4. BellSouth Documentation changes, including business rule changes will be provided.(Agree to add) • All such changes will be provided NLT 30 days in advance of Implementation. • All additions and changes to BellSouth business rule documentation will be provided to CLECs NLT 30 calendar days in advance of the release implementation date. • Implementation will occur NLT 90 days from the date of the prioritization of each change request.(BellSouth cannot support) 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.		

Part 33 – Types 2-5 Exception/Expedited Feature Process

Situations may arise from time to time that require exception treatment for Type 2-5 changes or a Type 6 Defect Change that has been reclassified as a feature change request. An expedited feature request is made to correct the inability of a CLEC to process certain types of orders to BellSouth due to a lack of programming on BellSouth's side of the interface. An exception may involve the extension of the normal intervals for the implementation of a Type 2-5 change.

These situations will be addressed using the following Exception/Expedited Feature Process. As each situation will likely be unique, this process provides the framework in which the CCP members will make the necessary consensus decisions to achieve implementation of the feature in an exception/expedited manner.

Figure 4-4 provides the process flow for the validation and resolution of a Type 2-5 Exception/Expedited Feature Change.

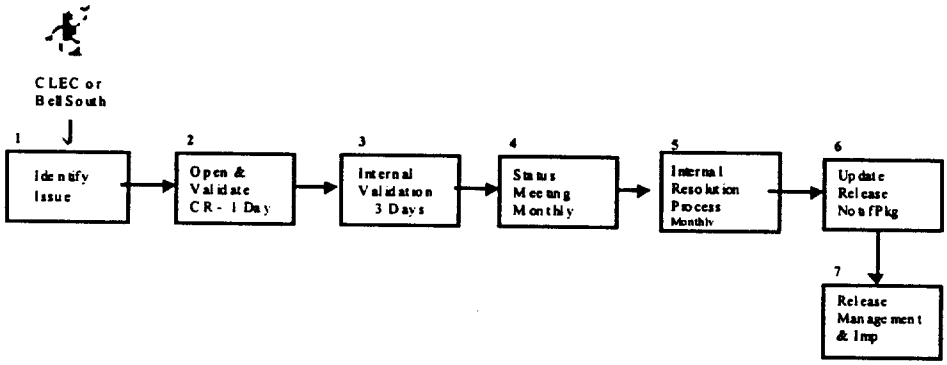


Figure 4-4. Type 2-5 Exception/Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 2-5 Exception/Expedited Feature Process. This process will be used to validate exceptions/expedites, provide status notification(s) and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table –4-4. Type 2-5 Exception/Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Identify Exception/Expedite. 2. Originator and CCCM or BCCM complete the standardized Change Request Form indicating that it is an Expedite Candidate. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments should include the following, if available: • PON • OCN • Specific scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 2-5 Change Request • Reclassified Type 6 Change Request • Exception/Expedited Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE EXPEDITE FORM FOR COMPLETENESS** 1. Log Exception/Expedite in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC.	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:**	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~2.~~3. Establish CR status ('N' for New Exception/Expedite). ~~3.~~4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist. ~~4.~~5. Verify specifications and related information exists. ~~5.~~6. Send Clarification Notification via email to the originator if needed. ~~6.~~7. Update CR Status to' PC' for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.	• New Exception/Expedite • Acknowledgment Notification • Clarification Notification (if required)	
3	BCCM	**INTERNAL VALIDATION** 1. Validate that it is an Exception/Expedite. 2. Perform internal exception/expedite analysis. 3. Determine status of request: • If request duplicates existing change request, forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled . • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Exception/Expedite ~~and indicate appropriate Impact Level.~~ • If issue does not qualify for exception/expedited treatment, re-classify as a standard feature change, provide supporting information via	**INPUTS:** • New Exception/Expedite **OUTPUTS:** • Validated Exception/Expedite • Exception/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	3 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		email to the originator for review and feedback. The Change Request will exit the exception/expedite process flow and enter Types 2-5 normal process flow at Step 3. NOTE: See Section 11.0 Terms and Definitions – Expedite Status for valid status codes and descriptions. Exception/Expedite notification will be provided to CLEC community via e-mail and web posting.		
4	BCCM CCP Members	MONTHLY STATUS MEETING 1. Provide status of Excpetion/Expedite. 2. Solicit CLEC/ BST input. 3. Reach consensus as to disposition. 4. Update Exception/Expedite information as needed.	INPUTS: • Exceptions/Expedites Received • Change Request Log • Exception/Expedite Analysis OUTPUTS: • Updated status • Updated Change Request Log • Meeting minutes	Monthly or when status changes, whichever occurs first.
5	BCCM	INTERNAL RESOLUTION PROCESS 1. Schedule and evaluate Exceptions/Expedites based on capacity and business impacts to the CLECs and BellSouth. 2. Provide status updates to the CLEC community via email as the status changes until the exception/expedite is implemented. Exceptions will be implemented in the release determined by the consensus reached in Step 4. Expedites will be implemented in the current, next release, or point release, best effort, as determined by the consensus of the CCP Members at the Monthly Status Review Meeting.	INPUTS: • CLEC/ BST input OUTPUTS: • Excpetions/Expedites Release Schedule	Monthly or when status changes, whichever occurs first.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
6	BCCM	**UPDATE RELEASE PACKAGE NOTIFICATION** 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". Note: The release notification will be published in a timely manner, based on the release constraints associated with the expedite.	**INPUTS:** • Exception/Expedite Feature Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for expedites (may be less than 30 days).
7	BCCM	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 2-5 Exception/Expedited Feature changes: 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 2. BellSouth business requirements will be presented to CLECs for expedited features (if applicable). If needed, changes will be incorporated and requirements re-baselined. 3. Once an Exception/Expedited Feature Change is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

PART 3 – EXPEDITED FEATURE PROCESS

An Expedited Feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories:

- A defect that has been re-classified as a feature where the CLEC has determined should be expedited due to impact
- An enhancement to an existing product or service where the CLEC has determined should be expedited due to impact

Re-classified Defects

When a defect is re-classifed as a standard feature, the CLEC will be notified by Change Control in the standard defect validation. The CLEC will have the ability to ask BellSouth to expedite the reclassified standard feature by updating the Change request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 process using agreed upon intervals. The rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

Enhancement to an existing product or service

A CLEC/BellSouth will also have the ability to submit a Type 4-5 change request as an expedited feature request for an enhancement to an existing product or service where the functionality does not currently exist in BellSouth's offered products and services. The rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.

- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

Figure 4.4 provides the process flow for the expedited feature process.

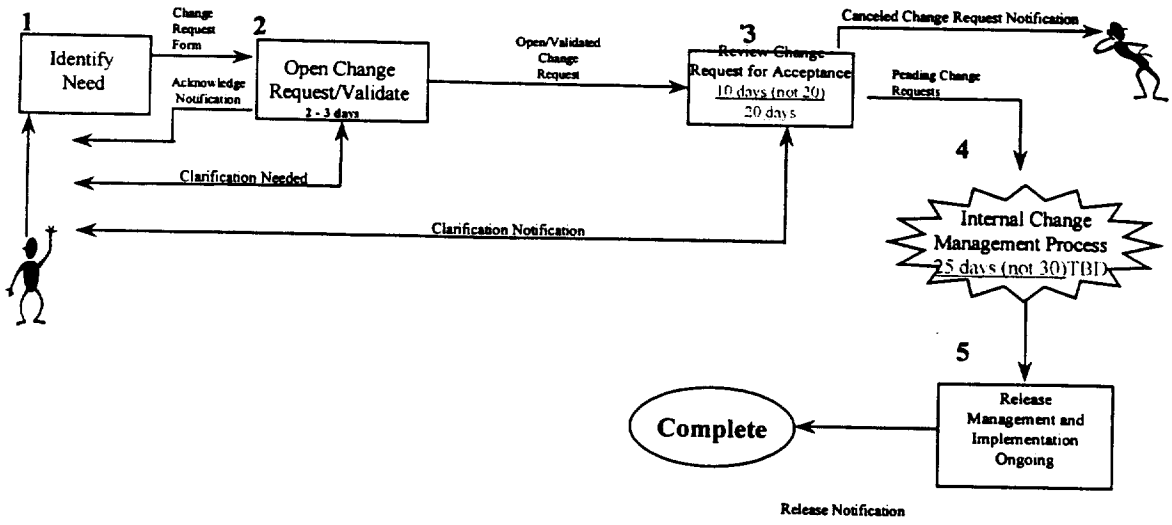


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and Attachment A-1A, Item 22. 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	1 Bus Day Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted area (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C" for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. • If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow, Step 4. **NOTE**: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth determines that a CLEC initiated expedited change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Validated Expedited Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	**INPUTS:** • Change Request Log **OUTPUTS:** • Release Date for Expedited Feature	~~30~~ 25 (Still under discussion)
5	BCCM (Project Managers from each participating company)	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements for software changes will be presented to CLECs, if applicable. If needed, changes will be incorporated and requirements re-baselined. 4. BellSouth Documentation changes, including business rules changes will be provided. 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date	Ongoing

5.0 DEFECT/EMERGENCY CHANGE/~~EXPEDITE NOTIFICATION~~ PROCESS

5.0 DEFECT PROCESS (Emergency Changes are already addressed as Type 1)

A CLEC/BST identified defect/emergency change~~expedite~~ will enter this process through the Change Management Team as a Type 6 Change Request. If the defect ~~/expedite~~ is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

A CLEC/BST identified defect will enter this process through the Change Management Team as a Type 6 Change Request. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

CLEC Notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

A **defect** is any non-type 1 change where a BellSouth interface used by a CLEC which is in production and:

- -is not working in accordance with the BellSouth baseline business requirements ~~or~~
- is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. (SPLIT into two bullets)
- Is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs
- Is impacting a CLEC's ability to exchange transactions with BellSouth

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- or where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data. -**REMOVE** (BellSouth considers this example a standard feature at which point would follow the Types 2-5 process flow, however if the issue falls under the definition of an "expedited feature", it would follow that process).

Definition of a defect also ~~This~~ includes errors in documentation, unclear documentation or missing documentation ~~defects~~.

Definition of a defect also includes errors in documentation, unclear or missing documentation.

~~An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.~~AGREE TO REMOVE AND MOVE TO NEW SECTION.

~~Type 6~~Defect Change Requests will have three Impact Levels:

- **High Impact**

The failure causes impairment of critical system functions and no electronic workaround solution exists.

~~Expedited features will be treated as High Impact.~~ AGREE TO REMOVE

- **Medium Impact**

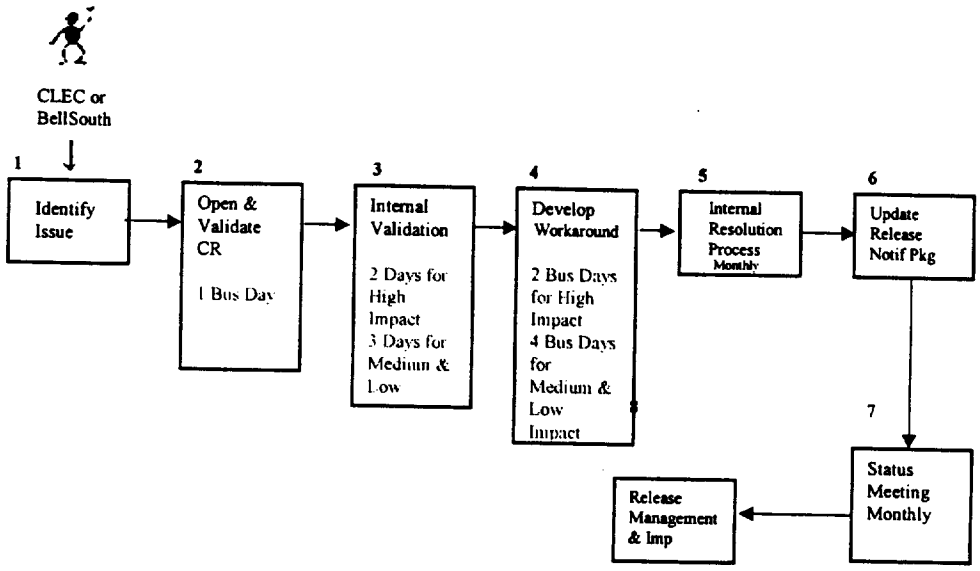
The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

The failure causes inconvenience or annoyance.

Defect Changes identified as High Impact are referred to as **Emergency Changes**. CLECs encountering High Impact defects outside normal business hours (7am – 6pm Eastern) will submit their requests to the Electronic Communications Support (ECS) Group. The ECS Helpdesk number is 888-462-8030. REMOVE – BellSouth can not support.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect/Emergency Change/~~Expedite~~.Remove the words "Emergency Change/Expedite.



~~Note: Step 4 (Develop Workaround) does not apply for High Impact Expedites.~~(Agree to Remove)

[NOTE: **The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.]**

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects~~/expedites~~ (Agree to remove), provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Identify Defect~~/Expedite~~.(REMOVED) ~~2.~~5. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. ~~3.~~6. Include description of business need and details of business impact. ~~4.~~7. Attach related requirements and specification documents. These attachments should (must) include the following, if available (REMOVE): • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 6 Change Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE DEFECT/EXPEDITE FORM FOR COMPLETENESS** 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect) 4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist.	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:** • New Defect/Expedite • Acknowledgment Notification • Clarification Notification (if required)	4 hours for High Impact 1 Bus Day for all Impact Types 1 Bus Day for Medium and Low Impact

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		5. Verify specifications and related information exists. 6. Send Clarification Notification via email to the originator if needed. 7. Update CR status to "PC" for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.		
3	BCCM	**INTERNAL VALIDATION** ~~1.~~4. Validate that it is a defect/expedite. ~~2.~~5. Perform internal defect/expedite analysis. ~~3.~~6. Determine status of request: • If change already exists or CLEC training issue~~or training issue~~ forward Cancellation Notification to CCCM or BCCM and update status to 'C' ~~for Request Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team~~. • If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to 'C'. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect/Expedite and indicate appropriate Impact Level. • If request is not validated as a defect and the requesting CLEC does not agree with the response, the CLEC may follow the escalation process to resolve the issue.	**INPUTS:** • New Defect/Expedite **OUTPUTS:** • Validated Defect/Expedite • Defect/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	1 Bus Day for High ~~and Medium~~ Impact 2 Bus Days for High Impact 3 Bus Days Medium and Low Impact

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		• If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. ~~Note: High Impact Expedites will skip Step 4 (Develop Workaround) and be scheduled for the current, next release, or point release, best effort.~~ (REMOVE) • If the process is operating as specified in the baselined requirements and published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s). • If issue is re-classified as a standard feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect/~~expedite~~(REMOVE) process flow and enter Types 2-5 process flow (enter at Step 3). **NOTE**: See Section 9.0 Terms and Definitions – Defect/~~Expedite~~(REMOVE) Status for valid status codes and descriptions. Defect/~~Expedite~~(REMOVE) notification will be provided to CLEC community via e-mail and web posting.		
4	BCCM	**DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)** 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via e-mail and web	**INPUTS:** • Validated Defect • Clarification Notification (if required) **OUTPUTS:** • Workaround (if applicable) • Clarification Notification (if	~~4 Bus Days~~ 1 Bus Day for High and Medium Impact 2 Bus Days for

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		posting.(ADDED) 4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. ~~Defect workaround notification will be provided to CLEC community via e-mail and web posting.~~(REMOVE) If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.	required) • Cancellation Notification (if required) • E-mail and web posting of workaround	High Impact 4 Bus Days for Low Impact 4 Bus Days for Medium and Low Impact
~~5~~	~~BCCM~~	~~MONTHLY STATUS MEETING~~ ~~1.Provide status of Defect/Expedite.~~ ~~2.Solicit CLEC/ BST input.~~ ~~3.~~5. ~~Update Defect/Expedite information as needed.~~ (BELLSOUTH AGREES TO MOVE THIS TO STEP 7)	~~INPUTS:~~ ~~• Defects/Expedites Received~~ ~~• Change Request Log~~ ~~• Defect/Expedite Analysis~~ ~~• Workaround (if applicable)~~ ~~OUTPUTS:~~ ~~• Updated status~~ ~~• Updated Change Request Log~~ • ~~Meeting minutes~~	~~Monthly or when status changes, whichever occurs first.~~
~~5~~6	BCCM	INTERNAL RESOLUTION PROCESS ~~1.~~3. Schedule and evaluate Defects~~/Expedites~~(REMOVED) based on capacity and business impacts to the CLECs and BellSouth.(ADDED) ~~2.~~4. Provide status updates to the CLEC community via email as the status changes until the defect~~/expedite~~(REMOVED) is ~~scheduled~~implemented.(ADDED) ~~NOTE: Validated defects (High Impact) will be implemented within a 4 – 25 business day range, best effort.~~ (REMOVED)	INPUTS: • CLEC/ BST input OUTPUTS: • Defect~~/Expedites~~ Release Schedule	~~Monthly or when status changes, whichever occurs first.~~ Validated High and Medium Impact defects will be implemented within a 4 – 10 business day range, best effort.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~Expedites (High Impact) will be implemented in the current, next release, or point release, best effort.~~(REMOVED)		Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium Impact Defects will be implemented within 90 days. Low Impact defects will be implemented best effort. Low Impact defects will be implemented within a 4 – 20 business day range, best effort. (REMOVE)
~~6~~7	BCCM	**UPDATE RELEASE PACKAGE NOTIFICATION** ~~1.~~3. Update and distribute release notification package via web. ~~2.~~4. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". Note: The release notification will be published in a timely manner, based on the release constraints associated with the defect/expedite.	**INPUTS:** • Defect~~/Expedite~~(Remove) Feature Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for defects~~/expedites~~(Removed) (may be less than 30 days).

DRAFT

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
7	BCCM	MONTHLY STATUS MEETING ~~5.~~6. Provide status of Defect. ~~6.~~7. Solicit CLEC/ BST input. ~~7.~~8. Update Defect/Expedite information as needed. (BELLSOUTH AGREES TO THIS STEP)	INPUTS: • Defects/Expedites Received • Change Request Log • Defect/Expedite Analysis • Workaround (if applicable) OUTPUTS: • Updated status • Updated Change Request Log Meeting minutes	Monthly or when status changes, whichever occurs first.
8	BCCM	RELEASE MANAGEMENT AND IMPLEMENTATION The following release management activities will pertain to Type 6 changes: 4. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. ~~3.~~5. Once a defect~~/expedite~~(REMOVED) is implemented in a release, the status will be changed to "I" for Change Implemented.	INPUTS: • Approved Release Package Notification OUTPUTS: • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT AND APPROVAL (Agree to Add)

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be scheduled to coincide with the published release schedules. [For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates.] All additions and changes to BellSouth business rule documentation will be provided to CLECs NLT 30 calendar days in advance of the release implementation date. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to ~~coincide with the published release schedules~~(Agree to remove) occur in March, June, September and December (Agree to quarterly meetings) and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda

- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's estimate of the size and scope of each Change Request(Agree to accept)
- Schedule of releases and capacity in each(BellSouth can only support providing the 'schedule of the releases')
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish "desired/want" dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- CLECs may choose to vote "no" on change requests that may potentially negatively impact its business. If a majority of CLECs vote "no" on any certain change request, that request will not be implemented.
- CLECs may choose to "defer" on voting on change requests that may negatively impact its business. A rating of "defer" will not be counted in the overall rating.
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- ~~Manual processes and~~ (Do not delete - BellSouth prefers that Manual CR's follow the same prioritization process as other CR's) Documentation changes(Agree) will be

prioritized separately; however they will need to be synchronized with the electronic interface changes

~~Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached~~(Agree to remove)

- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

Part 4 – Developing and Approving Release Packages

Subsequent to the Change Review Meeting BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held 25 business days later.

Subsequent to the Change Review Meeting, BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held three (3) to four (4) months prior to each major release.

- Sizing and sequencing of ~~prioritized~~ change requests will ~~begin~~ be accomplished at the Prioritization Meeting. CLECs may take into account the size and scope when prioritizing items.~~with the top priority items and continue down through the list until the capacity constraints for each future release have been reached.~~(BellSouth accepts)
- BellSouth will develop several variations of release packages to include all of the prioritized requests.
- BellSouth will develop and present two scenarios for the next release. Based on group consensus at the Release Package Meeting, the determination will be made as to which scenario should be implemented. BST/CLEC consensus will be used to create the Approved Release Package and schedule.

- All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.
- (BellSouth to propose two (2) scenarios) – 1) Unscheduled change requests will need to be re-prioritized at the next Change Review Meeting along with new pending requests to accommodate changes in the Industry's business requirements or 2) Prioritize only the new "Pending" CR's since the last Change Review Meeting. Rankings will be incorporated into the overall prioritization list. CLECs, based on group consensus, may request re-ranking of all non-scheduled CR's.

During the Release Package Meeting BST will present its proposed release packages. BST and CLECs will then vote on the release package or combination of release packages to be implemented. BST/CLEC consensus will be used to create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability. (BellSouth cannot support)

~~7.~~08.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth Originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as possible. When a new interface request is submitted, BellSouth will present information on the new interface and hold an open discussion at the next monthly status meeting. ~~A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30 - 45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community.~~ BellSouth will provide specifications on the interface being developed to the CLEC Community using the timeframes established in Part 4, Section 2. As new interfaces are deployed, they will be added to the scope of this document ~~document as appropriate, based on the use by the CLEC community~~ and requested changes will be managed by this process.

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC community. As new interfaces are deployed, they will be added to the scope of this document, as appropriate, based on the use by the CLEC and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs by submitting a Type 4 change request(Remove) through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used

and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Retirement of Versions

When software versions are retired, BellSouth will notify the CLECs by submitting a Type 4 change request through the Change Control Process. Once a change request to retire a version of an interface is initiated, BellSouth will present its proposed changes to the CLECs at the next monthly status meeting. BellSouth will make best effort to jointly develop the requirements with the CLECs and will, at a minimum, provide requirements and related software, if applicable, at least six months in advance of putting the new version into production.

Retirement of Versions

When software versions are retired, BellSouth will give the CLECs a 120 day notification.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.(Excludes Expedites)
- For Type 6 High and Medium Impact(See next bullet) issues, the escalation process is agreed to allow BellSouth a ~~three~~one-day turnaround to provide a status for each cycle of escalation.
- For Type 6 High Impact issues, the escalation process is agreed to allow BellSouth a two (2) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a five (5) day turnaround to provide a status for each cycle of escalation.
- For Type 6 Low Impact and Type 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three-day turnaround to provide a status for each cycle of escalation.(See next bullet)
- For Types 4-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.

- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Don Tighe Manager - EC Support Group Interconnection Operations	404-532-2233	1-800-946-4646 PIN 1440050	Don.Tighe@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
  - Definition and escalation of item.
  - History of item.
  - Reason for escalation.
  - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Type 2-5 Changes(BellSouth agrees) Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6, High and Medium Impact Changes: Within 1 business day of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 6 High Impact Changes: Within 2 business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Type 6 Medium and Low Impact Changes: Within five (5) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6 Low Impact and Type 2-5 Expedite Changes: Within 3 business days of receipt (2 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 4-5 Expedite Changes: Within three (3) business days of receipt (2 from acknowledgment), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Sales Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Terrie Hudson Director (for Systems Issues)	770-936-3740	Terrie.Hudson@bridge.bellsouth.com
	Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7828	Joy.A.Lofton@bridge.bellsouth.com
3rd Level	Doug McDougal Senior Director (for Systems Issues)	404-927-7505	Doug.Mcdougal@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including escalation within each company to the person with ultimate authority for Change Control operations, and the services of a Joint Investigative Team when appropriate, BellSouth and the impacted CLEC(s) agree as follows:

~~to follow this Dispute Resolution Process. BellSouth and the CLEC shall assemble a Joint Investigative Team, within one week, comprised of subject matter experts. The party prompting the dispute should initiate the formation of the team. The team should be co-chaired by representatives of BellSouth and the CLEC respectively. The investigative team will conduct a root cause analysis to determine the source of the problem, if one exists, and then develop a plan for remedying it. The parties to the dispute must escalate the issue within each company to the person who has ultimate authority for State operations in an effort to achieve a resolution.~~

~~If the dispute cannot be resolved between the companies after these steps are taken, then either party to the dispute may file a formal complaint with the State PSC through the Director of the Telecommunications section for binding mediation. The Director of the Telecommunications section, or his appointee, shall rule upon the complaint within 30 days of its filing. If either party is then aggrieved, it may file a formal complaint with the State PSC.~~

- Either party to the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, both parties shall participate in good faith.

- Either party may file a formal complaint with the State PSC, requesting resolution of the issue, without necessity for prior mediation.

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.

- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. Following this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution. The official ballot will detail the change being requested, and the significant arguments presented for and against the change during the review. The ballot will be distributed one week following the Status Meeting. CLEC's and BellSouth will have one week in which to cast their vote. Only ballots transmitted before midnight of the due date will be counted. Implementation of such changes will require a two-thirds affirmative ———vote for approval. ~~All changes will be submitted as a change request and reviewed~~.

(BellSouth continuing to Review)

10.0 TESTING ENVIRONMENT

Requests related to the processes of testing an interfaces will be included in the Change Control Process. Changes to BellSouth's testing environments and supporting processes will be submitted through the Change Control Process as a Type 4 or Type 5 request. The requests will follow the guidelines and intervals set forth in the Type 2-5 process flow.

BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.

BellSouth will also provide a pre-release testing environment for TAG and EDI that will be available to CLEC's 30 days **prior** to the implementation of any new releases. This environment will be a wholly separate, non-production environment for all preordering and ordering interfaces and will mirror the production environment.

NOTE: BellSouth would prefer to re-evaluate this section after the CLEC Test Environment is implemented in 1st Qtr. 2001.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, refer to the following BellSouth public Internet sites:

EDI

www.interconnection.bellsouth.com/markets/lec.html
Select "Customer Guides"
Select "Local Exchange Ordering Guides"
Select "BellSouth EDI Specifications – TCIF 9"
Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html
Select "OSS Information Center"
Select "TAG Documentation"

This site is password protected. You should obtain the password from your Account Team representative.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing Change Requests and defects/expedites.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
  - ◊ Dependencies relative to other data elements
  - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: BST cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects/expedites or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- Type 2-5 – Expedited Feature Change. Any Type 2-5 change that either BellSouth or a CLEC submits for exception handling in order to achieve a more rapid implementation.
- Type 4-5 – Expedited Feature Change . Any Type 4-5 change that either BellSouth or a CLEC submits for expeditious handling in order to achieve a more rapid implementation.
- Type 6 – CLEC Impacting Defect. Any non-Type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

~~Type 6 – CLEC Impacting Expedite. The ability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.~~(Agree to remove)

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.

  ~~**CT = Training.** Requested change already exists, additional training may be required.~~(agree to remove)
- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).

- **D** = Request Purge. Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled**. Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.
Defect. Any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working accordance with the BellSouth baseline business requirements, is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs, or is impacting a CLEC's ability to exchange transactions with BellSouth.

Defect/Expedite Status. The status of a CLEC Impacting Defect/Expedite Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
  - **CD = Duplicate Request.** A request for this change already exists.
  - ~~**CT = Training.** Requested change already exists, additional training may be required.~~
  - **CT = Training.** Requested change already exists, or CLEC training issue.
- **I = Implemented.** Indicates a Defect/Expedite Change Request has been implemented in a release (Step 6).
- **N = New Defect/Expedite Change Request.** Indicates a Defect/Expedite Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).

- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect/Expedite Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect/Expedite.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Emergency Change. Defect Changes identified as High Impact are **emergency changes.**(Remove – these changes are already addressed as Type 1 System Outages)

Exception Change. An exception change request may involve the extension of the normal intervals for the implementation of a Type 2-5 change.(BellSouth supports as an escalation)

Expedited Feature. An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a lack of programming ~~problem~~ on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.
Expedited Feature. An expedited feature is the inability for CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a defect that has been re-classified

as a feature where the CLEC has determined should be expedited due to impact and 2) an enhancement to an existing product or service where the CLEC has determined should be expedited due to impact.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect/Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

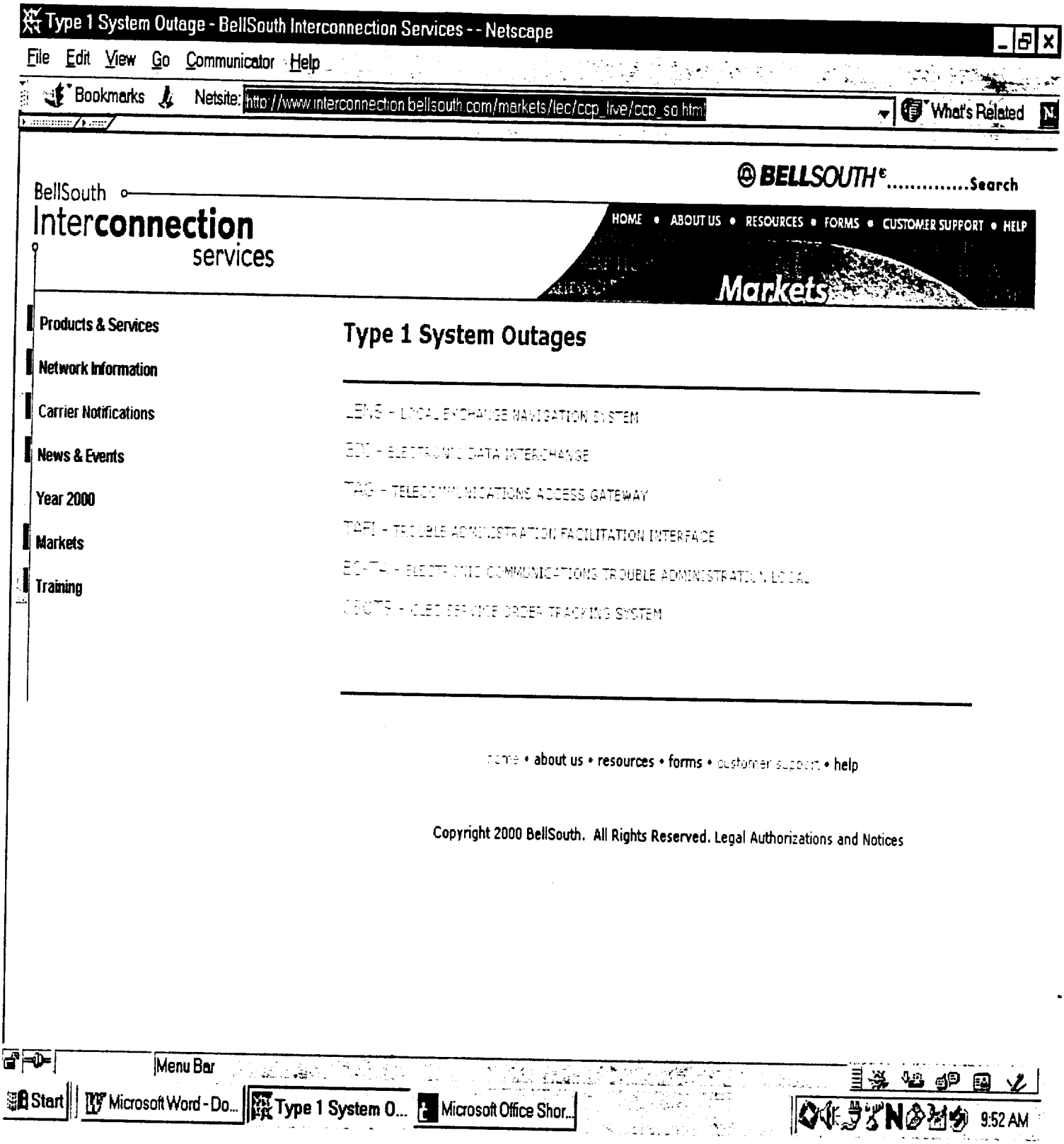
NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

Transmittal Cover Sheet for Pate Exhibit RMP-19

This sheet transmits the

Type-1 System Outages posted on the CCP website

which consists of 1 page.


Type 1 System Outage - BellSouth Interconnection Services -- Netscape
File Edit View Go Communicator Help
Bookmarks Netsite: http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_so.html
What's Related
BELLSOUTH Search
BellSouth
Interconnection
services
HOME • ABOUT US • RESOURCES • FORMS • CUSTOMER SUPPORT • HELP
Markets
Products & Services
Network Information
Carrier Notifications
News & Events
Year 2000
Markets
Training
Type 1 System Outages
LENS - LOCAL EXCHANGE NAVIGATION SYSTEM
EDI - ELECTRONIC DATA INTERCHANGE
TAG - TELECOMMUNICATIONS ACCESS GATEWAY
TAFI - TROUBLE ADMINISTRATION FACILITATION INTERFACE
ECTA - ELECTRONIC COMMUNICATIONS TROUBLE ADMINISTRATION LOCAL
CEDITS - CLEC ELECTRONIC ORDER TRACKING SYSTEM
home • about us • resources • forms • customer support • help
Copyright 2000 BellSouth. All Rights Reserved. Legal Authorizations and Notices
Menu Bar
Start
Microsoft Word - Do...
Type 1 System O...
Microsoft Office Shor...
9:52 AM

Transmittal Cover Sheet for Pate Exhibit RMP-20

This sheet transmits the

Excerpt of AT&T Witness Jay M. Bradbury Testimony
(Florida PSC Docket No. 000731-TP)

which consists of 1 page.

g) an eight step cycle, repeated monthly;

Q. WHAT CHANGES DOES AT&T REQUEST REGARDING THE CHANGE CONTROL CYCLE?

A. AT&T will concur with the number and sequence of steps contained in BellSouth's proposed Version 2 for Type 2 – 5 Change Requests, but continues its request for reduced cycle times in order to met its business needs. BellSouth's associated proposed language and AT&T's proposed modifications may be found on the following pages in Exhibit JMB-10:

Page	Nature of AT&T Proposed Change
21 and 23	reduction in Step 3 interval from 20 to 10 business days
21 and 26	reduction in Step 7 interval from 30 to 25 business days

Transmittal Cover Sheet for Pate Exhibit RMP-21

This sheet transmits the

September 28, 1999 EICCP Enhancement Review Meeting Minutes

which consists of 3 pages.

MEETING MINUTES

DATE: Tuesday, September 28, 1999

MEETING: EICCP Enhancement Review Meeting

PURPOSE: To present/discuss Change Requests submitted to EICCP

ATTENDEES

Mark Turner, MCI	Mike Young, Sprint		
Jill Williamson, AT&T	Sandy Evans, Sprint		
Kevin McAllorum, ATT	Margaret Garvin, BST		
Tyra Colbert, MCI	Pat Rand, BST		
Lillian Newsome, BST			

SUMMARY OF MEETING

TOPIC	*DISCUSSION*
Regulatory Issues	No regulatory issues were discussed
Final CLEC Prioritization	• EDI0812990001 (EDI Ordering xDSL Loops)- Targeted for Release 4/2000 • EDI0812990003 (Using ATT directory form) – **A.S.A.P. (10/1/99 – DDD)** • EDI0812990004 (Change Main Account #) – **A.S.A.P (8/23/99—DDD)** • EDI0812990005 (Handling Remaining Lines) – Targeted for 4/2000 • EDI0812990007 (Use of LEATN/LEAN) – Targeted for 4/2000 • TAG0812990001 (Pre-Order Enhancements for Loops; CFA, NC/NCI-Targeted for Release 4/2000 • TAG0812990002 (DSL Capability) – Targeted for Release 4/2000 • TAG0812990003 (Parsed CSR) – Targeted for Release 4/2000 • TAG0907990001 (TaG Pre-Order Business Rules) – **A.S.A.P. (10/1/99 – DDD)** • LEO0812990001 (Change in headers for clarification) – **A.S.A.P. (10/1/99)** • LSR0623990001 (Distribution of work using SC field) – **A.S.A.P.**

General Discussion Items	• The BCCM opened the meeting and provided a presentation of the highlights of the meeting. The initial prioritization was discussed as well as the ability to complete the final prioritization.
	• The purpose of the ERM was to review the pending change requests and provide the CLECs the opportunity to discuss their requests for final prioritization.
	• The CLECs discussed each of the change requests and combined two and cancelled one.
	• The following change requests are being cancelled due to duplication:
	  • EDI0812990006 (Combine this request with EDI0812990001
	  • EDI0812990002 (Incorporated under TAG0812990002 – Note: There is no EDI pre-order today)

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TOPIC	DISCUSSION
Change Request Discussion EDI0812990001	• The following notes depict the discussion highlights on each change request. **EDI Ordering for Unbundled xDSL Loops** Interface Impacted - EDI, Ordering Type Change – Add new functionality • Ability to order unbundled xDSL on one order via EDI • CLEC needs business rules and fields that need to be populated. • CLEC requests that this include all digital loops, i.e., port with DSL Loop
EDI0812990003	**411 Drop-out form– CLEC requested that BST utilize their manual form to advise BST of an End User's listing that is not appearing on 411, Etc.** Interface Impacted - EDI, Ordering Type Change – Process CLEC would like BST to adopt their 411 Drop-out form as an interim solution when the drop out is caused by BST • CLEC would like to work jointly with BST in the development of a form/process at OBF to resolve this issue.
EDI0812990004	**Change Main Account Number** Interface Impacted - EDI, Ordering Type Change – Software The CLEC would like BST to expand the use of EATN and ATN for the REQTYP JB. By allowing the CLEC to populate the existing EATN and the new in ATN field, the CLEC would not have to submit the inforamation in RMKS. • The CLEC would like this change for both TCIF7 and OSS99.
EDI0812990005	**Handling of Remaining Service** Interface Impacted - EDI, Ordering Type Change - Software The CLEC would like BST to develop new fields in support of the handling of the remaining lines when partial migrations are involved and the lead number is being migrated.
EDI0812990007	**Use of LEAN/LEATN fields** Interface Impacted - EDI, Ordering Type Change - Software The CLEC would like the restrictions of 4 accounts lifted when processing multiple End User Accounts to LNP.
TAG0812990001	**Pre-Order Enhancements** Interface Impacted - TAG, Pre-Order Type Change – Software The CLEC would like BST to provide CFA assignment and NC/NCI codes as part of its pre-order functionality. • The CLEC is expecting a project plan for the implementation of this request.
TAG0812990002	**Pre-Order Loop Inquiry** Interface Impacted – TAG, Pre-Order

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TOPIC	*DISCUSSION*
	Type Change – Software The CLEC requested that BST provide xDSL capability notification electronically. • The CLEC is expecting a project plan for the implementation of this request.
TAG0812990003	**CLEC is requesting BST to provide a parsed CSR.** Interface Impacted – TAG, Pre-Order Type Change – Software The CLEC questioned if Linda Tate had reviewed the BellAtlantic guidelines for parsed CSR.
TAG0907990001	**TAG Pre-Order Documentation Enhancements** Interface Impacted – TAG, Pre-Order Type Change – Documentation As part of the OSS99 upgrade, the CLEC requested BST to provide business rules for TAG Pre-Order.
LEO0812990001	**Error Code List Note Modification** Interface Impacted — none Type Change – Documentation The CLEC requested that on the selected headers stated in the change request, that BST add some information in the header in order to clarify the columns.
LSR0623990001	**Workflow Mechanization** Interface Impacted – EDI Type Change – New or revised edits. CLEC is requesting a process be changed in order to prevent their LSRs from being missed when the service is associated with complex service.
Upcoming Meetings	• **Change Request Status meeting for 1 hour on 10/21/99**. The purpose of the meeting is to discuss the pending change requests, respond to questions regarding new change requests. Bridge has been setup for this call. • **Change Request Status meeting for 1 hour on 11/09/99**. The purpose of the meeting is to discuss the pending change requests, respond to questions regarding new change requests. Bridge has been setup for this call. **10/21 and 11/09 - The Bridge Number is 205 970-3744, ACCESS CODE 8324, the call is scheduled for 9:00 CST – 10:00 CST**
Action Items	1. If BST makes changes to EDI does it automatically affect TAG? 2. Reinforce functionality – As BST implements change requests, involve the CLEC in the process; how it's designed. 3. Verify if all end offices would be converted for LNP? 4. How are due dates treated on the Change Requests, i.e., priority, expedite, rush, etc.? 5. Investigate CORBA for ordering and provisioning DSL loops. 6. When Issue 6 is removed, what exactly is being removed (interfaces)? 7. When will manual forms change to LSOG4? (90 day notice)
MEETING ADJOURNED	The meeting was adjourned

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Transmittal Cover Sheet for Pate Exhibit RMP-22

This sheet transmits the

March 29, 2000 CCP Monthly Status Call Minutes

which consists of 5 pages.

BELLSOUTH

Change Control Process
Monthly Status Meeting Minutes

DATE: March 29, 2000

MEETING: Monthly Status Call

PURPOSE: Review Status of Pending/Approved Change Requests

ATTENDEES

Tyra Colbert, MCI	Kate Cooper, Eftia	Valerie Cottingham, BST
Sandy Evans, Sprint	Jill Williamson, AT&T	Edwardine Marrone - BST
Kristen Hudson, Nextlink	Joe Ayala, Nightfire	Shamne Stapler, ITC-DeltaComm
Bill Shoemaker, BST		Cheryl Storey, BST

AGENDA

Agenda — Review status of pending/approved Change Requests (including defects) and review current Release Management statuses.

SUMMARY OF MEETING

TOPIC	*DISCUSSION*
Opening	The BCCM opened the meeting and covered the items we were to accomplish on this conference call. • Review regulatory mandates. • Review status of pending/approved Change Requests • Review status of pending defects • Review current Release Management statuses • Schedule remaining monthly status meetings for year 2000
Regulatory Mandates	There are no regulatory mandates at this time.

New Change Requests	The following new change requests were received during March, 2000 and are being reviewed for acceptance: • **ORD030200001 UNEs via ASR21** • **EDI030200001 Modify Line Activities with Industry Guidelines (LNA of "C")** • **EDI030300001 BST Test Environment for EDI** • **TAG030900001 LNA Functionality of V – Pre-OSS99** (BST provided response to originating CLEC on 3/20/00-refer to "Canceled Change Requests" section) • **ORD032700001 Post FOC-Clarification**
New Defect Change Requests Received	New Defect Change Requests received during March, 2000: • **DEF030100001 Room Field Expansion** This change re-classified as a feature. Room field scheduled to be expanded 4/15/00. • **DEF030100002 Pre-Order/Order Business Rule Discrepancies** This change re-classified as a feature. BST is looking at all the fields identified as discrepancies, with exception to room & bldg, and looking at the impacts to all fields and applications. We are looking to include this in a Release in the near future. • **DEF030200001 RPON Business Rules** This change re-classified as a feature. Business rules being developed. • **DEF032300001 Line Class of Service – REQTYP "M" (port/loop combo)** This change re-classified as a feature. An expedited change implemented 3/28/00. It was agreed that the Change Request Log number should be renamed since these issues were re-classified as features. The new CR Log numbers will be as follows: **OLD CR LOG # / NEW CR LOG#** DEF030100001 / CR0001 DEF030100002 / CR0002 DEF030200001 / CR0003 DEF032300001 / CR0004
Implemented Change Requests	Change Requests Implemented: • **LEO8129900001 Change the Error Code Headings to Match Terminology Used** Implemented 12/99. • **TAG09079900001 Business Rules for TAG** Implemented - Posted to web site 12/99.

Canceled Change Requests	• **SOT011200001 Remarks Section added to CSOTS** **Explanation of Cancellation by BellSouth**: "Remarks" are omitted because it contains proprietary information that is passed between internal BST departments during the provisioning of the service. A request can be made of the LCSC to create a report that addresses the reason for cancellation of orders on a per CLEC basis. "Missed Appointment" codes are posted on service orders. The definition of "Missed Appointment" codes reside in the CLEC Service Order Tracking System User Guide, Computer Based Tutorial and in other documentation accessed via the BellSouth web site. • **TAG030900001 LNA Functionality of V – PRE-OSS99** **Explanation of Cancellation by BellSouth**: BellSouth will implement the pre-OSS99 LNA of V functionality using the LNA of G. BellSouth has decided the functionality needs to be discernable using the new LNA of G. This reduces the need for training, distribution and creation of new Methods and Procedures, minimizes errors/gaps and supports the request of other CLECs in providing a new LNA. The LNA of G is targeted for 4/29 implementation. The LNA of V, post OSS99, functionality will remain in tact. Sprint is currently in the process of investigating a workaround, will advise Change Control of Cancellation Acknowledgement.
Change Requests Scheduled for Release	The following Change Requests are scheduled for upcoming releases: • **ALL020900002 YPH – 4/15/00** • **DEF030100001 Room Field Expansion – 4/15/00** • **OSS011300001 Migration as Specified for OSS99 – 4/29/00** • **TAG011700001 Migration as Specified for OSS99 – 4/29/00** • **EDI0812990001 Electronic ordering for unbundled XDSL loops – 7/01/00** • **TAG0812990002 DSL Capability – 7/01/00** Next tentative Release is scheduled for 11/11/00.

User Requirements Documentation	• Requirements for YPH, EU-ROOM, LSF and LNA of G distributed 3/6/00 for discussion during 3/7/00 conference call. • Updated requirements for LSF distributed 3/9/00. • Updated User Requirements for XDSL distributed 3/27/00. • Updated requirements for LNA of G to be distributed 3/29/00.
Non-Scheduled Change Requests	**List of non-scheduled Change Requests to be returned to Step 4 of the CCP as Input for the "Prepare for Change Review Meeting" process:** • **LSR0623990001 Redirection of UNE LSRs in the LCSC** Clarification regarding this request: AT&T is requesting that BellSouth create edits in our system to cause the orders to be routed to the appropriate work group. This change should have no impact on the current ordering process and business rules being used by the CLECs. • **EDI0812990003 AT&T form for directory listing 411 drop outs** Clarification regarding this request: AT&T requests some type of electronic vehicle that would provide notification to correct the problem with 411 fall out. This electronic vehicle should require CLECs to provide minimum information. The Directory Assistance & Listings Correction Request Fax Form provided by AT&T would be acceptable only as an interim solution. • **EDI0812990004 One LSR to change the main account # on a listings only account** • **EDI0812990005 Handling of Remaining Lines** • **TAG0812990001 CFA/NC &NCI via TAG pre-order** • **EDI0812990007 Use of LEAN/LEATN**
Pending Change Requests	• **EDI121599001 TN vs RSAG validation** This request is currently under review. • **TAG0812990003 Parsed CSR** Subteam being formed to perform planning & analysis during 2000. • **EDI02090001 Electronically Order Routing to OS/DA** Team working to develop an electronic process.
Next Change Review Meeting	The next Change Review meeting has been tentatively scheduled for Wednesday, June 28, 2000. This will be a face-to-face meeting in Atlanta, GA. This meeting will include a monthly status and then prioritization of pending change requests. Meeting details to follow. Requests must be accepted and in "Pending" status by **June 16, 2000** to be included in the prioritization meeting on June 28, 2000. To allow adequate time for change requests to be reviewed for acceptance and placed in "Pending" status by June 16, change requests should be received by no later than **May 15, 2000**.
Suggestions for Change Request Log	The following suggestions were made regarding improvements to the Change Request Log: • Categorize the requests by interface or status. • Include a comments/status column These changes will be incorporated to the Change Request Log.
Schedule for Remaining Monthly	The schedule for remaining 2000 monthly status meetings is as follows: April 26, 2000 May 24, 2000

Status Meetings	June 28, 2000 (also tentative prioritization meeting) July 26, 2000 August 23, 2000 September 27, 2000 October 25, 2000 November 15, 2000 December 13, 2000 The conference bridge for April 26 and May 24 is as follows: **Bridge # 205-970-3741** **Access code 4736**

Transmittal Cover Sheet for Pate Exhibit RMP-23

This sheet transmits the

October 3, 2000 Parsed CSR Kickoff Meeting Minutes

which consists of 3 pages.

Parsed CSR Kickoff Meeting Minutes

October 3, 2000

Document Preparation Information

PROJECT NAME	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED
Parsed CSR Team	Kevin McCall		10/3/00

Announcement Information

TO	COMPANY	TO	COMPANY
Brenda Jones	BellSouth	Valerie Cottingham	BellSouth
Kevin McCall	BellSouth	Cheryl Story	BellSouth
Wheeler Stewart	BellSouth	Lewis Garrison	BellSouth
Patricia Allen	BellSouth	Gloria Burr	BellSouth
Debra Rolle	BellSouth	Saundra Glover	BellSouth
Kathy Smith	BellSouth	Tyra Hush	WorldCom
Jill Williamson	AT&T	Woody Roe	Albion
Dave Burley	WorldCom	Jane Hunter	Sprint
Becky Wellman	IDS	Suzanne Angelo	Telcordia
Mae Means	Sprint	Bill Grant	Telcordia
Mike Young	Telcordia	Stacey Hassan	Birch Telecom
Sandy Evans	Sprint	Bill Gulas	IDS
Keith Kramer	IDS	Pat Woods	WorldCom
Brad Hamilton	IDS	Kerrie Dedmon	Trivergent
Bahvin Sheth	DSET	Sheriann Lively	Trivergent
Akshay Goel	DSET	Dave Marmen	BellSouth
Carol Sanders	Trivergent	Mary Ellen Dominque	Trivergent
Caryn Stottenger	Quintessent		

Meeting Information

DATE	START TIME	END TIME	LOCATION
10/03/00	10:00 A.M. EDT	12:30 P.M. EDT	Conference Bridge (205) 970.3742 Access 6637

CALLED BY	PHONE	FAX
Change Control	205-321-2113	205-321-5160

Parsed CSR Kickoff Meeting Minutes

October 3, 2000

Agenda

Agenda Items	Discussions
Introduction of Interim Project Manager	Brenda Jones was introduced as the Interim Project Manager for the Parsed CSR team.
Gain Better Understanding of Parsed CSR Requirements	Brenda Jones discussed the intent of this meeting was to clarify the CLECs needs in the Parsed CSR efforts. For the CSR, currently BellSouth returns a string of data. The CLEC community is requesting that BellSouth return the data in a fielded/parsed format. The team agreed to review an analysis of LSOG 4 from AT&T. This document also indicated AT&T's position on what fields were needed on the Query and Response. AT&T explained the definitions of C/O/R on the analysis document as follows: C= Conditional. May or may not be required under certain circumstances O= Optional. Always optional, not required in any circumstances R= Required.
Formation of Parsed CSR Sub team	An agreement was reached to form a small sub team to review the requirement inputs from the CLEC community and present the consensus findings to the overall group. The sub team consists of the following: Becky Wellman – IDS Jill Williamson – AT&T Tyra Hush – WorldCom Dave Burley – WorldCom Jane Hunter or Mae Means – Sprint Suzanne Angelo – Telcordia Mike Young – Telcordia Bill Grant – Telcordia Sheriann Lively – Trivergent Bahvin Sheth – DSET Brad Hamilton – IDS Parsed CSR Project Manager –BellSouth Change Control – BellSouth

Parsed CSR Kickoff Meeting Minutes

October 3, 2000

Agenda Items	Discussions
Steps Moving Forward	The upcoming dates that were agreed upon in the meeting were as follows: 10/10 – CLECs input based on the AT&T/LSOG 4 analysis to be submitted back to Change Control 10/19 – Sub team meeting in Atlanta to review inputs and form consensus. The findings of the sub team will be submitted to the CLEC community via Change Control for further discussions.

Transmittal Cover Sheet for Pate Exhibit RMP-24

This sheet transmits the

October 19, 2000 Parsed CSR Sub Team Meeting Minutes

which consists of 5 pages.

BELLSOUTH

October 19, 2000
Parsed CSR Sub Team
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Parsed CSR Sub Team BellSouth Conference Center	Cheryl Storey – Change Control Team	10-20-00

Participants/Attendees

PARTICIPANT	COMPANY
Sheriann Lively	Trivergent
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Jill Williamson	AT&T
Bill Grant	Telcordia
Becky Wellman	IDS
Edwardine Marrone	BST
Brenda Wallace	BST

PARTICIPANT	COMPANY
Jane Hunter	Sprint
Suzanne Angelo	Telcordia
David Burley	WorldCom
Tyra Hush	WorldCom
Ron Thompson	XO Comm
Saundra Glover	BST
Pat Moore	BST
Chris Iacovelli	AT&T

Meeting Information History

DATE	START TIME	END TIME
10/19/00	10:00 AM EDT	4:00 PM EDT

MEETING PURPOSE

- Review CLEC input on Parsed CSR Requirements.
- Review each data element and reach consensus on which fields the CLECs would like to see parsed.
- Discuss next steps: (1) CLEC Community review and concurrence, (2) BST Internal Review of CLEC Requirements

Jill (AT&T) recommended that once the CLEC requirements are agreed upon, BellSouth should meet with the CLEC community to discuss and identify what can and cannot be accommodated. Change Control advised that BellSouth would meet with the CLEC community to discuss requirements after the BST Internal Review.

October 19, 2000
Parsed CSR Sub Team
MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. Conditional Requirement Example	An example of a conditional requirement was shared as follows: *Required Foreign or Secondary book listing, otherwise optional.*
2. Review of data elements	Edwardine Marrone led the review of the data elements with the Sub Team. The results of the changes agreed upon will be reflected in the updated requirements to be provided to the Sub Team by 11/3/00. Discussion took place regarding the definition of optional, conditional and required. The following was agreed upon: *Optional = if on the account, information is provided/returned* *Required = if a data element is on all CSRs. All the fields are required if the information is present.* The CLECs recommended that pre-ordering and ordering field lengths should be consistent.
3. LSOG 5	It was mentioned that BellSouth planned to implement LSOG 5 between the July - December, 2001 timeframe. The CLECs advised that for planning purposes they need to know what fields are going to be supported by LSOG 5. The CLECs also stated that the move to LSOG 5 should flow through Change Control and be a joint effort. BellSouth has not made a firm commitment as to when LSOG 5 will be implemented. LSOG 5 changes will funnel through the Change Control Process. CLECs are aware of industry's strategic direction for the implementation of LSOG 5.

Agenda Items	Discussion
4. Summary of Action Items	BellSouth will address the following and provide responses to the Sub Team by 11/3/00: • TXTYP - Transaction Type (Field #3) – define transaction type for Customer Service Inquiry. Define what information would be returned via each valid entry (i.e., what is the CLEC going to submit and what is BST going to return?). Define what data elements would not be included. • Determine correct field name for EATN vs. ATN and EAN vs. AN. • End User Name (Field #16) – is this a valid field for use with the CSI? • Definition of DDQTY and DIRQTY • Investigate zip code differences: DDAZC vs. ZIPCODE • DIRID – is this a BST supported field? • DIRTYP – does this field drive the type of directory delivered? • DNA – is this a BST supported field? • YPH – Confirm 6 numerics or 6 alpha/numerics. CLECs need the YPH for the LSR. • YPHV – confirm if the YPH verbiage can be returned separately. CLECs want this returned separately. • DIRSUB and DIRNAME – are these BST supported fields? • DML – is this a BST supported field? • D/TSENT – confirm metric standards being used • Review fields that end with the suffix "SS" to confirm consistencies.

Agenda Items	Discussion
5. NEXT STEPS	BellSouth will update the Parsed CSR requirements spreadsheet with the agreed upon changes and provide to the Sub Team by 11/3/00 for review. BellSouth will also provide (best effort) to the Sub Team responses to the above action items by 11/3/00. A follow up meeting/conference call will be scheduled with the Sub Team to finalize the CLEC Parsed CSR requirements. The final CLEC Parsed CSR requirements will be shared with the CLEC community for feedback and concurrence. Once CLEC community concurrence obtained, BST Internal review of the requirements will take place. Once the BST Internal review of the requirements is complete, a meeting with the CLEC community will be scheduled to review/discuss.

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October 19, 2000
Parsed CSR Sub Team
MEETING MINUTES

Transmittal Cover Sheet for Pate Exhibit RMP-25

This sheet transmits the

November 16, 2000 Parsed CSR Sub Team Meeting Minutes

which consists of 4 pages.

BELLSOUTH

November 16, 2000
Parsed CSR Sub Team
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Parsed CSR Sub Team BellSouth Conference Center	Cheryl Storey – Change Control Team	11-17-00

Participants/Attendees

PARTICIPANT	COMPANY
Sheriann Lively	Trivergent
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Jill Williamson	AT&T
Bill Grant	Telcordia
Becky Wellman	IDS
Edwardine Marrone	BST

PARTICIPANT	COMPANY
Jane Hunter	Sprint
Suzanne Angelo	Telcordia
David Burley	WorldCom
Vickie Beachley	BST

Meeting Information History

DATE	START TIME	END TIME
11/16/00	10:00 AM EST	3:00 PM EST

MEETING PURPOSE

- Review 10/19/00 Action Items and reach consensus on the field definitions & field valid values.
- Determine the usage (required, optional or conditional) for each field
- Discuss next steps: (1) CLEC Community review and concurrence, (2) BST Internal Review of CLEC Requirements
- Review New Action Items

BELLSOUTH

November 16, 2000
Parsed CSR Sub Team
MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. Required, Conditional & Optional Definitions	The following definitions were agreed upon for required, conditional and optional: Required – always going to be transmitted. Conditional for Query – Required or prohibited under certain specified circumstances related to dependencies of other fields. Conditional for Response – Required if information exists on the CSR. Optional – not applicable for Query or Response.

Agenda Items	Discussion
2. Review of CLEC User Requirements (included the responses to the 10/19 Action Items)	Edwardine Marrone led the review of the data elements with the Sub Team. The results of the changes agreed upon are reflected in the attached updated CLEC requirements document. Vickie Beachley will be the BST Internal Project Manager for this effort. It was agreed that the deleted fields would be removed from the next update of the CLEC requirements. TYTYP Field - For the "E" entry, it was agreed that we add billing and directory delivery. D/TSENT - divide into two fields: - DT-SENT (8 numeric) - TM-SENT (6 numeric) Discussion was held regarding what information would be returned if queried by the following fields: ATN - return the entire account. AN - return the entire account. WTN - return just that working telephone number. ECCKT - return just the ECCKT information. The CLECs do not want a reference message to the Miscellaneous Account Number. FEATURE field - during the BST Internal review, it will be determined if something will always be returned in the FEATURE field. Discussion took place on the field length of the suffix fields being different. The street address fields are 4 a/n. The house number fields are 5 a/n. YPHV (Yellow Page Heading Verbiage) field is not supported by BellSouth as a separate field, the YPH Verbiage is included in the YPH field. The CLECs would like this information parsed.

Agenda Items	Discussion
3. Summary of Action Items	BellSouth will address the following action items: • D/TRCVD – determine if this information will/can be returned. If returned, as two elements. • Investigate what validation takes place on the "End User Name" field on the LSR. • Verify the field length for "Feature Description" • Ensure valid entries listed under "ERRCODE" are covered under the Response codes (RESPC & RESPD). Also compare OBF codes to what BST currently has. • Confirm if "O" and "P" are valid entries for FPI.
4. NEXT STEPS	BellSouth will update the Parsed CSR requirements spreadsheet with the agreed upon changes and provide to the Sub Team during the week of 11/20/00. BellSouth will also provide a list of the above action items with target due date for a response. The Sub Team will review the updated requirements and advise Change Control of any questions, comments within 7 - 10 days. The final CLEC Parsed CSR requirements will be shared with the CLEC community for feedback and concurrence. Once CLEC community concurrence obtained, BST Internal review of the requirements will take place. An internal BST meeting is scheduled for the week of 11/27/00. As a result of this meeting, a preliminary schedule and timelines will be developed and shared with the CLEC community. Targeting the first of 2001 to have a follow-up meeting with the CLEC community.

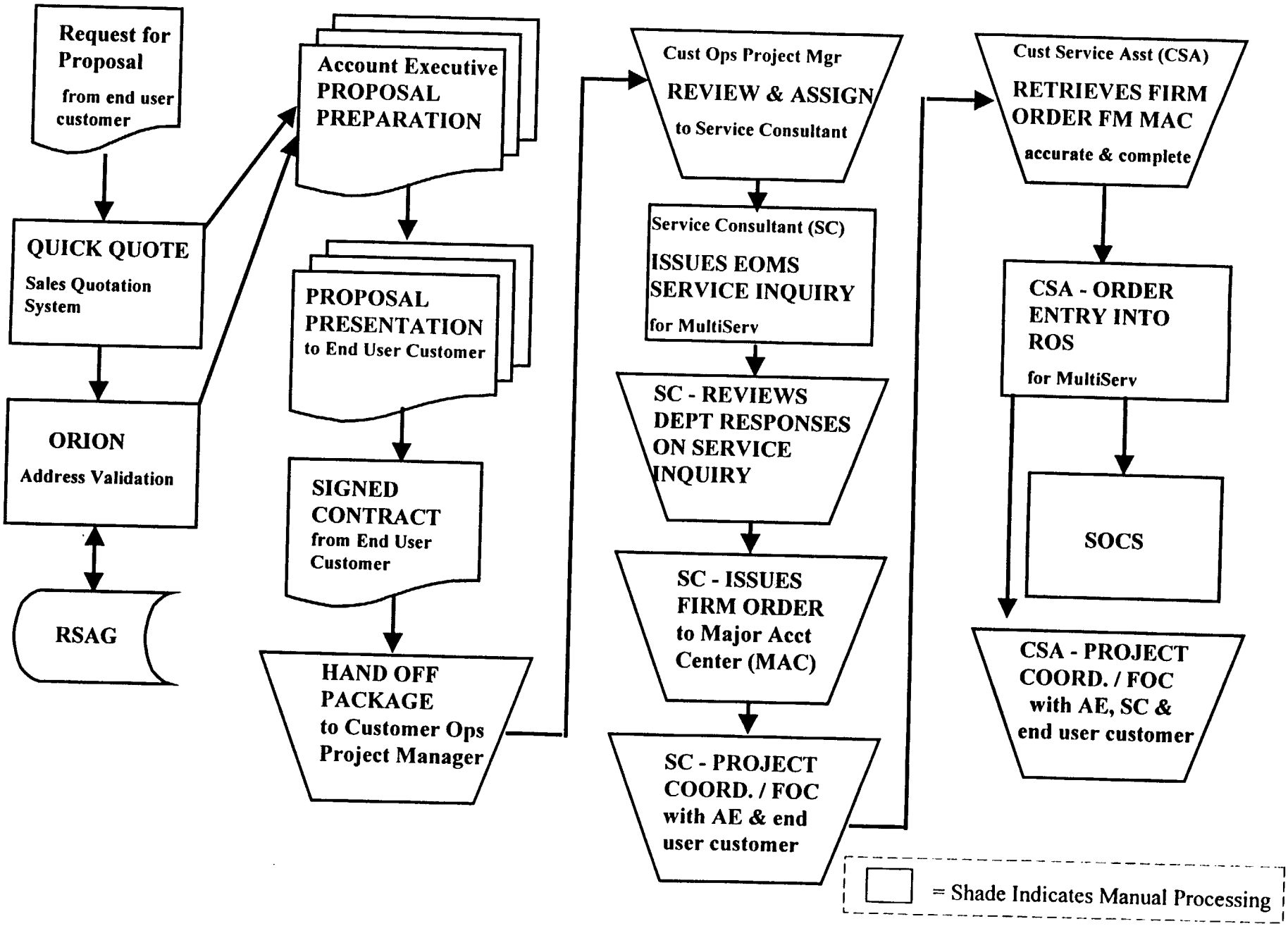
Transmittal Cover Sheet for Pate Exhibit RMP-26

This sheet transmits the

CLEC Complex Services MultiServ® Diagram

which consists of 1 page.

BST RETAIL: Complex Services - MultiServ®



Transmittal Cover Sheet for Pate Exhibit RMP-27

This sheet transmits the

BellSouth Retail Complex Services MultiServ® Diagram

which consists of 1 page.

CLEC: Complex Services - MultiServ®