BEFORE THE TENNESSEE REGULATORY AUTHORITY

TESTIMONY OF JAY M. BRADBURY

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 00-00079

DECEMBER 20, 2000

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Jay M. Bradbury. My business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309.

Q. PLEASE DESCRIBE YOUR CURRENT POSITION AND RESPONSIBILITIES.

A. I am a District Manager in the AT&T Law and Government Affairs organization, and I provide consulting support to AT&T's business units and other internal organizations. In particular, I am involved in the negotiation and implementation of interfaces for operational support systems ("OSS") necessary to support AT&T's entry into the local telecommunications market.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

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POSTED 12-20-00

A. I graduated with a Bachelor of Arts degree in History from The Citadel in 1966. I have taken additional undergraduate and graduate courses at the University of South Carolina and North Carolina State University in Business and Economics. In 1987 and 1988, I participated in Advanced Management Programs at Rutgers University and the University of Houston. I earned a Masters Certificate in Project Management from Stevens Institute of Technology in 2000.

I began my AT&T career in 1970 as a Chief Operator with Southern Bell's Operator Services Department in Raleigh, North Carolina. From 1972 through 1987, I held various positions within Southern Bell's (1972 - 1984) and AT&T's (1984 - 1987) Operator Services Departments where I was responsible for the planning, engineering, implementation and administration of personnel, processes and network equipment used to provide local and toll operator services and directory assistance services in North Carolina, South Carolina, Kentucky, Tennessee and Mississippi.

In 1987, I transferred to AT&T's External Affairs Department in Atlanta, Georgia where I was responsible for managing AT&T's needs for access network interfaces with South Central Bell, including the resolution of operational performance, financial and policy issues. From 1989 through November 1992, I was responsible for AT&T's

relationships (including the negotiation and administration of billing and marketing contracts, card honoring contracts, facility contracts, and the support of sales of Network Systems products) with Independent Telephone Companies within the South Central Bell States and Florida. From November 1992 through April 1993, I was a Regulatory Affairs Manager in the Law and Government Affairs Division and was responsible for the analysis of industry proposals before regulatory bodies in the South Central States to determine their impact on AT&T's ability to meet its customers' needs with services that are competitively priced and profitable.

In April of 1993, I transferred to the Access Management Organization within AT&T's Network Services Division as a Manager - Access Provisioning and Maintenance with responsibilities for on-going management of processes and structures in place with Southwestern Bell to assure that their access provisioning and maintenance performance met the needs of AT&T's Strategic Business Units. In August 1995, I became responsible for the negotiation and implementation of interfaces for operational support systems (OSS) necessary to support AT&T's entry into the local telecommunications market in the BellSouth states. I assumed my current position in June 1998.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony explains and supports AT&T's requests for the following services from BellSouth:

a) A two-part procedure for ordering Operator Services/Directory Assistance ("OS/DA") in conjunction with loop-port combinations as a UNE (Issue 15);

b) That the BellSouth OS/DA service ordered by AT&T be provided as a UNE at UNE rather than market based prices. (Issue 14);

c) A robust Change Control Process (Issue 17);

d) Specific improvements to BellSouth's pre-ordering and ordering interfaces (Issue 18); and

e) Specific improvements to BellSouth's maintenance and repair interfaces (Issue 19).

My testimony demonstrates that the OSS interfaces, processes and functions currently offered by BellSouth do not comply with the Telecommunications Act of 1996[1], and its implementing regulations, and explains AT&T's need for and entitlement to the services requested from BellSouth.

Q. PLEASE DESCRIBE FURTHER THE ISSUES THAT YOUR TESTIMONY WILL COVER.

[1] Pub.L. No. 104-104, 110 Stat. 56 (1996) hereinafter the "1996 Act".

A. In Issue 15, AT&T requests a specific two-part procedure for ordering Operator Services/Directory Assistance ("OS/DA") in conjunction with loop-port combinations (the Unbundled Network Element Platform or UNE-P). AT&T has requested a process by which it would place a combination of two orders. First, AT&T would place an Infrastructure Provisioning Order (or "footprint order") that would identify a specific geographic area (such as end office, rate center, LATA or state) and also would specify the network elements that AT&T would require in order to offer service throughout that area. Among other things, the Infrastructure Order would include AT&T's selection of OS/DA routing for loop-port and resale service customers calls to either (1) BellSouth's OS/DA systems on a branded or unbranded basis, or to (2) another system of AT&T's choosing. Thereafter, AT&T would place Customer-Specific Provisioning Orders, which would identify the particular features required by a specific new customer. These customer-specific orders should receive electronic processing without subsequent manual handling by BellSouth personnel. I shall refer to this issue as the Footprint-OS/DA Issue.

In Issue 14, AT&T requests that BellSouth OS/DA (either AT&T branded or unbranded) ordered by AT&T using the process described in Issue 15 be provided as a UNE at UNE rates. In its UNE Remand Order, the FCC clearly requires RBOCs to provide OS/DA as a UNE,

at UNE rates, unless the RBOC provides customized routing to CLECs. BellSouth does not provide customized routing through a commercially viable, timely, repeatable process and thus is required to offer and charge for OS/DA as a UNE, rather than at market based rates. I shall refer to this issue as the OS/DA Price Issue.

In Issue 17, AT&T requests a comprehensive Change Control Process, which BellSouth has failed to provide to date. Without a comprehensive process that is both well documented and followed by BellSouth once established, to handle changes that BellSouth makes to its interfaces and processes, and to their supporting documentation (such as specifications, business rules, methods and procedures), AT&T cannot make corresponding changes in its own interfaces and processes, and its customers repeatedly encounter delay and frustration. I shall refer to this issue as the Change Control Process Issue.

In Issue 18, AT&T requests a number of OSS improvements that have been at issue between the companies for some time. Although repeatedly requested by AT&T, BellSouth has yet to provide AT&T with the OSS functionality it provides to itself that supports the quality of service enjoyed by BellSouth's retail customers. I shall refer to this issue as the Equivalent Functionality Issue.

In Issue 19, AT&T requests a full function, machine-to-machine, integrateable Maintenance and Repair interface. Such an interface is technically feasible and has been an issue between the companies and before this Authority and the FCC for a number of years. I shall refer to this issue as the Maintenance and Repair Access Issue.

BACKGROUND

OPERATIONS SUPPORT SYSTEMS OBLIGATIONS UNDER THE ACT

Q. WHAT ARE OPERATIONS SUPPORT SYSTEMS ("OSS")?

A. Operations support systems are the computer-based systems, information, databases and personnel that telecommunications carriers use to perform essential customer and business support functions, including pre-ordering, ordering, provisioning, maintenance and repair, and billing. OSS includes the automated and manual processes required to make resale services and unbundled elements, among other items, meaningfully available to competitors. Computer-based OSS enable telecommunications carriers to transmit data electronically between different systems, thereby maximizing efficiency and effectiveness in the performance of these essential support functions. In addition to computer-based systems, information and databases, OSS also includes any necessary manual processes

performed by personnel located in various types of "centers" when computer-based processes have not been provided or are not available. In short, good computer-based processes are not enough – BellSouth also is obligated to provide, on a nondiscriminatory basis, the manual processes involved in operating essential support functions.

Q. WHY DOES YOUR TESTIMONY DISCUSS BELLSOUTH'S MANUAL PROCESSES AND MANUAL WORK CENTERS? ARE NOT ALL OF BELLSOUTH'S OSS COMPUTER-BASED PROCESSES?

A. No, not all of BellSouth's OSS are computer-based systems. The word "system" is synonymous with neither computers nor electronic interfaces. BellSouth's work centers and the manual procedures used by service representatives also are "systems." Although BellSouth has an obligation to develop, implement and deploy electronic interfaces for all OSS functionalities equal to those it uses itself, it has not yet happened and may not happen for some considerable time. Moreover, BellSouth must provide nondiscriminatory operations support processes for pre-ordering, ordering, provisioning, maintenance and repair, and billing, regardless of whether or not electronic interfaces have been implemented. As long as BellSouth uses manual processes as well as computer-based processes for

these functions, this Authority should ensure all such processes are provided to competitors on a nondiscriminatory basis.

Q. HAS THE FEDERAL COMMUNICATIONS COMMISSION ("FCC") ADDRESSED ACCESS TO OSS UNDER THE ACT?

A. Yes. The FCC "conclude[d] that OSS and the information they contain fall squarely within the definition of 'network element' and must be unbundled upon request under section 251(c)(3) . . . ."[2] The FCC reiterated this important requirement in various proceedings conducted pursuant to Section 271 of the Act:[3]

In addition, the FCC concluded that OSS functions are subject to the duty imposed by Section 251(c)(3) on incumbent local exchange carriers ("LEC") to provide nondiscriminatory access to network elements, and the duty imposed by Section 251(c)(4) to provide resale services under just, reasonable, and nondiscriminatory conditions.[4] The FCC recognized that a "competing carrier that lacks access to operations support systems equivalent to those the incumbent LEC

[2] First Report and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 11 FCC Rcd. 15499 at ¶ 516 (1996), aff'd in part and vacated in part by Iowa Utils. Bd. v. FCC, 120 F.3d 753 (8th Cir. 1997), aff'd in part and rev'd in part by AT&T Corp. v. Iowa Utils. Bd., 119 S. Ct. 721 (1999), hereinafter "FCC Local Competition Order".

[3] Memorandum Opinion and Order, Application of BellSouth Corp., et al. Pursuant to Section 271 to Provide In-Region, InterLATA Services in South Carolina, 13 FCC Rcd. 539 (1997), hereinafter "FCC South Carolina Order" and Memorandum Opinion and Order, Application of BellSouth Corporation, et al. for Provision of In-Region, InterLATA Services in Louisiana, 13 FCC Rcd. 20599 (1998), hereinafter "FCC Louisiana II Order".

provides to itself, its affiliates, or its customers, 'will be severely disadvantaged, if not precluded altogether, from fairly competing.'"[5] The FCC reiterated these principles in its recent reviews of the Bell Atlantic and Southwestern Bell applications to enter the interLATA long distance market.[6]

Q. HAS THE FCC EXPLAINED WHAT CONSTITUTES NONDISCRIMINATORY ACCESS?

A. Yes. In its Interconnection Order, the FCC found that nondiscriminatory access "necessarily includes access to the functionality of any internal gateway systems the incumbent employs in performing [pre-ordering, ordering, provisioning, maintenance and repair, and billing] functions for its own customers."[7] The FCC defined "internal gateway system" as "any electronic interface the incumbent LEC has created for its own use in accessing support systems for providing pre-ordering, ordering, provisioning, repair and maintenance, and billing."[8] Examples of internal gateway systems that BellSouth uses in Tennessee are the Regional Negotiation

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[4] FCC Local Competition Order ¶ 517; FCC South Carolina Order ¶ 83; and FCC Louisiana II Order ¶ 84.

[5] FCC South Carolina Order ¶ 82; see also FCC Local Competition Order ¶ 518; FCC Louisiana II Order ¶ 80.

[6] Memorandum Opinion and Order, Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, CC Dkt. No. 99-295, FCC 99-404 at ¶ 83, 1999 WL 1243135 (rel. Dec. 22, 1999), hereinafter "FCC BA-NY Order"; Memorandum Opinion and Order, Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance, CC Dkt. 00-65, FCC 00-238 at ¶ 92, ,hereinafter "FCC Texas SWBT Order".

System ("RNS"), the Regional Ordering System ("ROS"), and the Trouble Analysis Facilitation Interface ("TAFI"). Accordingly, BellSouth must provide AT&T with nondiscriminatory access to the functionalities of RNS, ROS, TAFI, and other internal gateway systems.

The FCC discussed in greater detail the incumbent LEC's obligation to provide nondiscriminatory access to OSS functions in its various orders on Section 271 applications from BellSouth and other Regional Bell Operating Companies ("RBOCs"). The FCC explained that incumbent LECs must provide access to OSS functions that sufficiently support each of the three modes of competitive entry strategies established by the Act (interconnection, unbundled network elements, and services offered for resale) and must not favor one strategy over another.[9]

The FCC found that "[f]or those OSS functions that are analogous to OSS functions that an incumbent LEC provides to itself -- including pre-ordering, ordering and provisioning for resale services -- a BOC must offer access to competing carriers equivalent to the access the

[7] FCC Local Competition Order ¶ 523 (emphasis added).
[8] FCC Local Competition Order ¶ 523, n. 1274.
[9] Memorandum Opinion and Order, Application of Ameritech Michigan Pursuant to Section 271 to Provide In-Region, InterLATA Services in Michigan, 12 FCC Rcd. 20543 at ¶ 133 (1997), (hereinafter "FCC Ameritech Order").

BOC provides itself."[10] The FCC also found that "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."[11] In addition, the FCC found that "for those OSS functions that have no retail analogue, such as ordering and provisioning of unbundled network elements, a BOC must offer access sufficient to allow an efficient competitor a meaningful opportunity to compete."[12]

The FCC also found "that excessive reliance on manual processing, especially for routine transactions, impedes the BOC's ability to provide equivalent access."[13] Manual processing by BellSouth results in delay and increased error in the fulfillment of customer's orders which negatively impacts AT&T's ability to compete with BellSouth in providing service to its customers in substantially the same time and manner as BellSouth.

AT&T is particularly concerned about the high number of orders placed electronically that "fall out" of the electronic processing system as a result of BellSouth's design decisions not to provide complete electronic processing for all elements and services purchased by alternative local exchange companies ("CLECs") and the failure of

[10] FCC South Carolina Order ¶ 98; see also FCC Ameritech Order ¶ 139.
[11] FCC South Carolina Order ¶ 98; see also FCC Louisiana II Order ¶ 87.
[12] FCC South Carolina Order ¶ 98; see also FCC Ameritech Order ¶ 141; FCC Louisiana II Order ¶ 87; FCC BA-NY Order ¶ 83, and FCC Texas SWBT Order ¶ 95.

BellSouth's systems to properly process transactions for which they have been designed. Orders for which electronic processing has not been provided or that "fall out" of BellSouth's systems due to system failure are processed manually by individual employees in one of BellSouth's two Local Carrier Service Centers ("LCSCs"). Individual employees tend to interpret BellSouth's business rules subjectively, which results in varying treatment of similar orders. For example, some orders will be rejected, while similar orders will not, based simply on the subjective decision of a BellSouth employee. Orders that electronically flow through BellSouth's ordering system, on the other hand, are treated the same way and are rejected or processed on a consistent basis. Thus, a high "fall out" rate (and conversely, a low flow-through rate) results in a greater number of problem orders. Additionally, the FCC has recognized that low order flow-through can "indicate a wide range of possible deficiencies in a BOC's OSS that may deny an efficient competitor a meaningful opportunity to compete in the local market."[14]

Q. WHAT ARE THE CHARACTERISTICS OF AN INTERFACE THAT PROVIDES NONDISCRIMINATORY ACCESS TO AN INCUMBENT LEC'S OSS?

[13] FCC Louisiana II Order ¶ 110.
[14] FCC BA-NY Order ¶ 162.

A. For an interface to satisfy the Act's nondiscrimination requirements, the FCC consistently has indicated that the interface must demonstrate, at a minimum, the characteristics described below. Additionally, appropriate operational data and performance measurements are necessary to determine whether the proposed OSS interfaces meet these five characteristics.[15] An interface with the following characteristics of nondiscrimination will minimize differences in OSS functional capabilities between the incumbent LEC and the CLEC:

> **Electronic** -- The interface must be a machine-to-machine interface (computer application program to computer application program) that provides fully electronic interaction between the incumbent LEC's OSS and the CLEC's OSS.[16] A machine-to-machine interface decreases the time, reduces the cost, and improves the accuracy of an CLEC's performance of OSS functions,[17] while failure to deploy an application-to-application interface denies competing carriers equivalent access to pre-ordering OSS functions.[18]

[15] See FCC Ameritech Order ¶ ¶ 138, 141-42, 204-213; FCC BA-NY Order ¶ 89.
[16] FCC South Carolina Order ¶ ¶ 152-66.
[17] FCC Louisiana II Order ¶ 96, n. 291.
[18] FCC South Carolina Order ¶ 166; FCC BA-NY Order ¶ 137.

Functionality -- The interface must provide all CLECs with the capability to perform the same OSS functions with at least the same level of quality, efficiency, and effectiveness that the incumbent provides to itself.[19] For those functions that do not have a retail analogue, the incumbent LEC must offer access to such OSS functions sufficient to allow an efficient competitor a meaningful opportunity to compete.[20]

Documented -- The interface must be documented accurately, adequately and sufficiently in advance to allow CLECs a reasonable opportunity to develop and deploy their own necessary systems, work processes, and employee training to use the interface.[21] Properly documented interfaces will facilitate completion of those necessary tasks in a manner that provides CLECs a meaningful opportunity to compete.

Capacity -- The interface must have the capacity to meet combined market volumes of all CLECs with response times that are equivalent to those the incumbent LEC provides

[19] FCC Local Competition Order ¶ 523; FCC South Carolina Order ¶ 98; FCC Ameritech Order ¶ 139; and FCC Louisiana II Order ¶ 87.
[20] FCC South Carolina Order ¶ 98; FCC Louisiana II Order ¶ 87; FCC BA-NY Order ¶ 129 and FCC Texas SWBT Order ¶ 148.
[21] FCC South Carolina Order ¶ 111; FCC Ameritech Order ¶ ¶ 137, 215; FCC Louisiana II Order ¶ 85; FCC BA-NY Order ¶ 88; and FCC Texas SWBT Order ¶ 97.

itself.[22] Sufficient capacity will ensure that OSS interfaces do not become a bottleneck that impedes a CLEC's ability to compete.

Standards -- The interface must comply with existing telecommunications industry standards or ease the transition to evolving standards regarding:

- What is to be communicated (message protocol component);
- Specific information to be communicated (data elements); and
- language and rules for communication (communication protocols).

Although the use of industry standards can meet the needs of a competitive local exchange market,[23] lack of industry standards does not excuse an incumbent LEC from meeting its obligation to provide nondiscriminatory access to OSS functions.[24] Similarly, deploying an interface that merely adheres to industry standards is not sufficient to demonstrate nondiscriminatory access. A BOC must provide nondiscriminatory access to its OSS functions irrespective of the existence of, or whether it complies with, industry standards.[25]

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[22] FCC Ameritech Order ¶ ¶ 137, 194; FCC Louisiana II Order ¶ ¶ 139-40; FCC BA-NY Order ¶ 88; and FCC Texas SWBT Order ¶ 97.
[23] FCC Ameritech Order ¶ 217; FCC BA-NY Order ¶ 88.
[24] FCC South Carolina Order ¶ 121, n. 362.
[25] FCC Louisiana II Order ¶ 137.

ISSUE 15 THE FOOTPRINT-OS/DA ISSUE

Q. SHOULD BELLSOUTH PROVIDE CUSTOMIZED OS/DA ROUTING TO AT&T FOR ITS UNE PLATFORM CUSTOMERS THROUGH A PROCESS THAT ESTABLISHES COMMON (INFRASTRUCTURE) ELEMENTS IN ADVANCE OF CUSTOMER ORDERS AND CUSTOMER SPECIFIC ELEMENTS USING FLOW-THROUGH ORDERING? A. Yes. In Issue 15, AT&T requests a specific two-part procedure for ordering loop-port combinations (the Unbundled Network Element Platform or UNE-P)[26], including the associated Operator Services/Directory Assistance routing. AT&T has requested a process by which it would place a combination of two orders. First, AT&T would establish routing of calls to a specific Operator Services / Directory Assistance ("OS/DA") service or provider for a given "footprint" area, which may be as small as a single central office, or as large as an entire state. Thereafter, AT&T would place Customer-Specific Provisioning Orders, which would identify the particular features required by a specific new customer.

[26] The Unbundled Network Element Platform consists of the combination of a UNE loop that provides connectivity between a customer's location and a BellSouth central office and a UNE port that provides access to the switching functionality available in that central office, including local, long distance and ancillary calling. The UNE-P purchaser takes on additional business relationships with other CLECs, Independent Companies, Inter-exchange Carriers, BellSouth, and other vendors including the associated financial risks. These relationships and risks are not associated with resale of BellSouth's local services.

The Local Service Request ("LSR") would act as the Customer-Specific Provisioning Order. AT&T should be able to electronically submit LSRs for UNE-P, and the orders should electronically flow through BellSouth's systems and be provisioned at parity with BellSouth retail. As discussed below, electronic LSRs with flow-through ordering should be available for orders that request either an unbranded or an AT&T-branded platform.

Q. PLEASE DESCRIBE THE OPTIONS FOR ROUTING OS/DA CALLS.

A. When an AT&T customer picks up the telephone and dials "0" for operator service or "411" for directory assistance, the call will be directed to the OS/DA platform chosen by AT&T. The call could be routed in one of four possible ways: [27]

- BellSouth's OS/DA platform, to be branded as BellSouth's service ("Welcome to BellSouth"). AT&T would not use this option as a long term solution.

- BellSouth's platform to be branded as the CLEC's service ("Welcome to AT&T");

- BellSouth's platform but not branded at all ("May I help you?");

- or it could be sent to AT&T's or another provider's OS/DA platform.

[27] Exhibit JMB-1 visually depicts how these alternatives are provided using the three offered technologies – Line Class Codes, Originating Line Number Screening and Advanced Intelligent Network.

AT&T is entitled to select the routing for its customers' OS/DA calls, and may decide to have more than one routing option within Tennessee.

Q. HOW DOES AT&T PROPOSE TO ACCOMPLISH ITS DESIRED ROUTING?

A. There are two steps necessary to accomplish AT&T's desired routing. These steps are illustrated in Exhibit JMB-2. First, BellSouth and AT&T must agree upon a process for ordering the trunking and translations that support customized routing. Next, AT&T must inform BellSouth which routing option it has chosen to use for a specific new customer. Unfortunately, both of these steps are the subject of dispute between the parties. I will discuss each step separately.

Q. PLEASE DESCRIBE THE FIRST STEP FOR OBTAINING AT&T'S DESIRED CUSTOMIZED ROUTING.

A. As stated above, the first step in obtaining AT&T's desired customized OS/DA routing is for BellSouth and AT&T to agree upon a process for ordering customized routing. AT&T has requested the two-part ordering process I mentioned above. First, AT&T would submit to BellSouth a "footprint" order (also known as a network design request, or "NDR") that would identify the trunking and routing required to direct

customers' OS/DA calls to the platform or platforms chosen by AT&T for a specific footprint area.

In Tennessee, for example, AT&T might place a footprint order for two OS/DA routing options in the major metropolitan end offices (one routing to BellSouth's platform, branded as AT&T, and another to AT&T's own platform), and a separate footprint order for the other end offices in the state, specifying only one routing option (to BellSouth's platform, branded as AT&T).

Later, when AT&T ordered service for a specific new customer, it would do so by electronically submitting a Local Service Request ("LSR"), which should, in turn, be electronically processed by BellSouth. If AT&T's footprint order had specified more than one OS/DA routing option for the area in which service was to be provided, AT&T's LSR would indicate which of the two routing options to use for that customer. No such indicator would be necessary if AT&T had requested only one routing option for the area.

In the above example, then, an AT&T LSR for a new customer outside a major metropolitan area would include no indicator, because the single routing information already would have been provided to BellSouth. An AT&T LSR for a new customer in a major metropolitan

area, on the other hand, would indicate which of the two previously identified routing options to use for that specific customer. This would allow AT&T the ability, for example, to route OS/DA calls from metropolitan residential customers to BellSouth's platform branded as AT&T, and calls from metropolitan business customers to AT&T's platform.

Q. YOU MENTIONED THAT THIS STEP WAS THE SUBJECT OF DISPUTE. PLEASE DESCRIBE THE DISPUTE AND AT&T'S POSITION.

A. There are two areas of disagreement related to this step of the process. First, despite repeated requests by AT&T, BellSouth has failed to provide detailed technical information on the process BellSouth would require in order to implement each of the three OS/DA routing strategies that AT&T may use. BellSouth has repeatedly stated its willingness to provide the information to AT&T, but has not produced detailed technical methods and procedures sufficient to inform AT&T of requirements for ordering customized routing.[28] Without this information, AT&T cannot develop the internal systems and processes it will need to submit orders to BellSouth. AT&T asks this Authority to order BellSouth to provide such documentation by a date certain.

[28] As indicated by the FCC in paragraph 223 of its Second Louisiana Order, AT&T has been attempting to get this information for over two years.

Recently a BellSouth witness stated that BellSouth had provided AT&T with all the necessary information in an E-mail transmittal sent on October 26, 2000. Unfortunately, that witness had been misinformed. The only information provided was proposed contract language that still provides none of the requested technical or methods and procedures documentation. Exhibit JMB-3.

Next, BellSouth wishes to limit AT&T to only one customized OS/DA route, apparently for the entire nine-state region. There simply is no justification for doing so in the Telecommunications Act or in FCC orders. The FCC has determined that incumbent LECs, including BellSouth, are required to provide customized routing as part of the switching function, unless they can prove that customized routing in a particular switch is not technically feasible.[29] At no time during negotiations has BellSouth indicated that customized routing was not technically feasible in any of its switches.

Further, the FCC has not limited BellSouth's obligation to provide OS/DA routing on a "one per CLEC" basis. Although BellSouth claims that certain language in paragraph 224 of the FCC's Second Louisiana Order implies that CLECs would have one routing plan on a region-wide basis, an examination of that paragraph reveals exactly

the opposite: The FCC anticipated that CLECs may have more than one OS/DA routing option, and instructed BellSouth to simplify its ordering processes accordingly:

> We agree with BellSouth that a competitive LEC must tell BellSouth how to route its customers' calls. If a competitive LEC wants all of its customers' calls routed in the same way, it should be able to inform BellSouth, and BellSouth should be able to build the corresponding routing instructions into its systems just as BellSouth has done for its own customers. (Footnote 705) If, however, a competitive LEC has more than one set of routing instructions for its customers, it seems reasonable and necessary for BellSouth to require the competitive LEC to include in its order an indicator that will inform BellSouth which selective routing pattern to use. (Footnote 706) BellSouth should not require the competitive LEC to provide the actual line class codes, which may differ from switch to switch, if BellSouth is capable of accepting a single code region-wide. (FCC Second Louisiana Order at ¶ 224, emphasis added.)

The footnotes are equally instructive: Footnote 705 discusses the possibility that AT&T might want all its customers' calls routed in a single fashion:

> For example, if AT&T wants all of its customers' calls routed to AT&T's operator services and directory assistance, AT&T should be able to tell this to BellSouth once, by letter for instance, and BellSouth should be able to route the calls without requiring AT&T to indicate this information on every order.

[29] FCC Local Competition First Report and Order, 11 FCC Rcd at 15709.

Footnote 706, on the other hand, discusses the possibility that AT&T may desire more than one OS/DA routing option:

> For example, if AT&T wants some of its operator services and directory assistance calls routed to its operator services and directory assistance platform, but it wants other operator service and directory assistance calls directed to BellSouth's platform, BellSouth does not know whether to route AT&T's customers' calls to AT&T's platform or its own unless AT&T tells BellSouth which option it is choosing.

BellSouth theorizes that this paragraph (224) implies that AT&T is limited to one "default" OS/DA routing option. The FCC's plain language reveals that BellSouth is wrong.

BellSouth has the ability to direct its own customers' OS/DA calls to different platforms, if it so desired. AT&T is entitled to access this ability and to direct its customers' calls in any way that is technically feasible.

Q. YOU STATED THAT THE NEXT STEP IN THE PROCESS WAS FOR AT&T TO INFORM BELLSOUTH WHICH ROUTING OPTION IT HAS CHOSEN TO USE FOR A SPECIFIC NEW CUSTOMER ONCE BELLSOUTH HAS IMPLEMENTED ALL THE AT&T REQUESTED ROUTING OPTIONS. PLEASE DESCRIBE THE DISPUTE RELATED TO THIS ISSUE.

A. AT&T and BellSouth disagree about the method by which AT&T will identify the OS/DA routing option it has selected for individual customers. I will therefore describe the method by which AT&T plans to identify its desired OS/DA routing option for each customer, and demonstrate that this method is consistent with (and contemplated by) the FCC in its Second Louisiana Order. I also will explain that the process urged by BellSouth violates FCC guidelines and effectively would limit AT&T to only one OS/DA routing option.

Q. PLEASE DESCRIBE AT&T'S DESIRED ORDERING METHOD.

A. As I explained above, AT&T will first place a footprint order specifying its desired OS/DA routing options within a geographic area. Later, it will submit customer-specific LSRs. If the footprint order specified only one OS/DA routing within the geographic footprint (for example, sending all OS/DA calls to BellSouth's unbranded OS/DA platform), AT&T will have provided BellSouth with routing instructions for all LSRs submitted within that footprint, so there is no need for AT&T to place additional information on the customer-specific LSR to reiterate the OS/DA routing. This is in keeping with the FCC's reasoning in its Second Louisiana Order at footnote 705:

> If AT&T wants all of its customers' calls routed to AT&T's operator services and directory assistance, AT&T should be able to tell this to BellSouth once, by letter for instance, and BellSouth should be able to route the calls without

> requiring AT&T to indicate this information on every order.

AT&T's footprint order/ customer-specific order process is designed to comply with this guidance.

If, on the other hand, If AT&T places a footprint order that specifies two possible OS/DA routing options, then AT&T's LSR must inform BellSouth which of the two options to use for each specific customer. AT&T wishes to do so by placing an indicator on the LSR, which could be accomplished by simply completing the existing feature field in the LSR with (for example) "UB/BLS" for BellSouth unbranded, "CB/BLS" for BellSouth branded as AT&T or "C/AOSR" for another provider's platform. The indicator for each option should be the same region-wide. Again, this is consistent with the FCC's Second Louisiana Order at ¶224, footnote omitted:

> If, however, a competitive LEC has more than one set of routing instructions for its customers, it seems reasonable and necessary for BellSouth to require the competitive LEC to include in its order an indicator that will inform BellSouth which selective routing pattern to use. BellSouth should not require the competitive LEC to provide the actual line class codes, which may differ from switch to switch, if BellSouth is capable of accepting a single code region-wide.

Q. IS BELLSOUTH CAPABLE OF ACCEPTING A SINGLE REGION-WIDE CODE FOR EACH OF THE OS/DA ROUTING OPTIONS REQUESTED BY AT&T?

A. Yes, BellSouth is quite capable of accepting a single region-wide code, or indicator, for each of the three OS/DA routings that may be requested by AT&T, and has never attempted to demonstrate that it is not. In order to do so, BellSouth simply would have to build translations tables for line class codes, as it has done already for its own use.

Q. PLEASE EXPLAIN.

A. Line class codes ("LCCs") and routing instructions are applied at the central office level and are contained within each office's software data tables. Exhibit JMB-1, page 1, depicts the use of LCCs to implement customized OS/DA routing for CLECs. The actual codes and data tables, however, are not uniform between central offices.[30] Thus, the line class codes for ordering (for example) customized OS/DA routing to BellSouth's unbranded platform may vary among central offices, even though they provide the same instructions to the switch. Only in recent years have the RBOCs, including BellSouth, established methods and procedures to improve the administration

[30] Part of the problem associated with LCCs and their administration is the fact that prior to the Act there was no need to administer LCCs in a manner that would allow them to be used in a competitive market. Thus, there was no need to create a system of uniform LCCs, and it was not done.

and commonality of LCCs. BellSouth solves this problem for itself with a database known as the Line Class Code Assignment Module ("LCCAM"). LCCAM determines, from the information on the retail service request, and the identification of the central office that will be used to serve the customer's line, the proper LCC to put on the service order.

The FCC was fully aware that LCC identifiers may be unique to central offices, and decided that requiring CLECs to enter each individual code on their orders would be an unreasonable burden.[31] The FCC set forth two alternatives by which competitors may order customized OS/DA routing. If a competitive provider wants all of its OS/DA calls routed in the same fashion, it may inform BellSouth once, perhaps by letter, without the need to indicate this information on each customer's order. If, on the other hand, the provider wants more than one set of routing instructions for its customers, the CLEC should provide "an indicator" on each customer's order that tells BellSouth which routing pattern to use for that customer.[32] As stated above, the FCC directed BellSouth to accept a single code across its region for each set of routing instructions desired by an CLEC.

[31] FCC Second Louisiana Order ¶ 224.
[32] FCC Second Louisiana Order ¶ 224.

On November 21, 2000, Mr. Milner (BellSouth) filed with the Georgia PSC an Affidavit in Dockets 6863-U and 7253-U, to "provide the Commission with the most current information concerning unbundled network elements, interconnection services, and resold services furnished by BellSouth.[33]

In paragraph 17 of his affidavit, Mr. Milner discusses Uniform Service Order Codes ("USOCs"), Field Identifier Codes ("FIDs"), the Line Class Code Assignment Module ("LCCAM"), a system called MARCH, and how they are used to assign Line Class Codes ("LCCs") to customer specific service requests. Mr. Milner calls this service order flow "parity by design"[34] and claims that nothing in the process or resulting LCC "distinguishes a BellSouth customer from a CLEC customer."[35] The "indicator" the FCC contemplated in its guidance regarding OS/DA ordering, and which AT&T is requesting, is analogous to a USOC. BellSouth provides USOCs for all other services and elements it makes available to CLECs, and USOCs are processed by LCCAM regardless of whether they are used by BellSouth or a CLEC. Mr. Milner's affidavit demonstrates that BellSouth's refusal to provide OS/DA routing LCCs through the use of USOCs and LCCAM for the industry as a whole and its insistence on

[33] I have attached a copy of this Affidavit as Exhibit JMB-4.
[34] Milner Affidavit page 6.
[35] Milner Affidavit page 7

requiring each CLEC to submit individual requests using an unspecified process is clearly arbitrary and discriminatory.

The processes and procedures requested by AT&T are logical, technically possible, and in accord with FCC orders. BellSouth misreads the FCC's guidance in an attempt to force a single "dictated" OS/DA routing method on AT&T rather than provide the required customized routing. The TRA should not be misled by BellSouth's abuse of the FCC's guidance, but should instead order BellSouth to provide the information, methods and procedures AT&T needs to determine and eventually order the customized OS/DA routing it desires, using the two-part process I have described. [36]

Q. HAS THE FCC REQUIRED BELLSOUTH TO PROCESS OS/DA ROUTING ORDERS ELECTRONICALLY?

A. No. Although the FCC has not required BellSouth to abandon manual processing of customized routing orders, it noted that BellSouth would have the burden of showing that it processed such orders in an efficient and nondiscriminatory manner:

> [W]e expect BellSouth to demonstrate that, if it requires specific information for selective routing that results in manual intervention in the

[36] The TRA should note that BellSouth's position on this issue predates the FCC's LAII Order. Thus, despite the FCC's guidance, which was offered in response to these very policies, BellSouth continues to insist that CLECs follow an outmoded and duplicative set of practices designed to limit their OS/DA ordering options.

> processing of such orders, BellSouth will be able to process such orders in a timely manner and in volumes reflecting reasonably foreseeable demand. Of course, the easiest way for BellSouth to make this demonstration is to ensure that orders that include selective routing information do not require manual intervention. FCC Louisiana II Order ¶ 225.

BellSouth did not attempt to make such a showing in either the Georgia or North Carolina arbitration proceedings.

Q. DOES BELLSOUTH'S OSS PROVIDE ELECTRONIC ORDERING FOR CUSTOMER SPECIFIC LSRS THAT REQUEST OS/DA ROUTING?

A. No. By its own admission, BellSouth provides no processes for electronic ordering of customer specific OS/DA today, and has made no commitment as to when such processes might be available, if ever.

BellSouth's recent decision to stop development of this functionality is particularly troubling. After over two years of having its requests for electronic flow through OS/DA ordering ignored, AT&T placed a formal change request with BellSouth for the capability in February 2000. BellSouth accepted the request, committed resources to the project and announced to the CLEC community that the capability for electronic ordering of one custom routing option (to BellSouth's platform unbranded) would be provided in Software Release 8 on November 18, 2000. BellSouth repeatedly reaffirmed this schedule in

industry meetings up to and including a meeting on September 29, 2000.

On October 11, 2000, BellSouth made the unilateral decision to remove this change from the Release. BellSouth informed the CLEC community the next day during a Requirements Review Meeting. The minutes from that meeting (Exhibit JMB-5) include the following:

> BST CCP advised that the OS/DA change request would be handled outside of Release 8.0. A new database called Originating Line Number Screening (OLNS) is being finalized that will provide this service in a more efficient manner. A meeting to discuss OLNS with interested CLECs is being coordinated for Monday, October 16, 2000. CCP also advised that the Methods and Procedures for OLNS are still under development.

There were two OLNS meetings held on October 16th I have included the minutes from both as Exhibit JMB-6. Neither meeting provided significantly more detailed information. OLNS is useful only if an CLEC elects to have one option for BellSouth-provided OS/DA for all of its customers in all nine BellSouth states. OLNS cannot be used to route OS/DA calls to any platform except BellSouth's. (Exhibit JMB-1, page 2, depicts an OLNS arrangement.) A CLEC subscribing to OLNS may send all of its customers to either BellSouth CLEC-branded service, or BellSouth unbranded service, but cannot differentiate between customers by (for example) sending residential customers to BellSouth's unbranded OS/DA and business customers

to BellSouth's CLEC-branded OS/DA. Additionally, BellSouth has provided no technical specifications or methods and procedures and no committed implementation data. And as BellSouth's witness, Mr. Keith Milner, testified in the Florida MCI Arbitration there is no electronic ordering capability available for OLNS.[37]

Given these serious deficiencies, OLNS does not meet BellSouth's obligation to provide customized OS/DA routing.

Q. HAS THERE BEEN ANY CHANGE IN BELLSOUTH'S DECISION TO REMOVE ELECTRONIC OS/DA ORDERING CAPABILITY FROM ITS SOFTWARE RELEASES?

A. No. During the recent Georgia Arbitration hearing, BellSouth's witness Mr. Keith Milner claimed that THE communication removing electronic ordering of OS/DA from Release 8 was incorrect, and that he personally had issued a memo directing that the decision be reversed and that CLECs be so informed immediately. Exhibit JMB-7. Despite Mr. Milner's claims, BellSouth has issued no retraction or rescheduling regarding the inclusion of OS/DA ordering in Release 8.[38]

[37] Transcript Florida PSC Docket 00649-TP, Volume 9, October 6, 2000, page 1330.

[38] In the Georgia arbitration hearing, Mr. Milner also claimed that BellSouth had provided AT&T with the information it had requested regarding detailed technical methods and

BellSouth filed a Late Filed Exhibit with the Georgia PSC on Monday, November 13, 2000, which included the memo to which Mr. Milner referred, as well as the earlier "mistaken" memo. The memo issued as a "mistake" was sent to CLECs on October 11, announcing that the ability to electronically order routing to OS/DA had been removed from Release 8.0. The October 12 memorandum confirmed, rather than contradicted, the first memo, saying, "We are only removing the Change Request for mechanizing the ordering process from Release 8." Later, BellSouth reiterated its decision to remove OS/DA ordering from Release 8 during the October 25, 2000, CCP Monthly Status Meeting.

I have provided BellSouth's Georgia Late Filed Exhibit and the Minutes of the October 25th Monthly Status Meeting as Exhibit JMB-8. BellSouth's announcement at the meeting and my objection to it are noted on page 9 of the minutes, and the action item resulting from my request to seek reinstatement of this feature is found on page 18.

Although BellSouth's Georgia Late-Filed Exhibit states that electronic ordering now will be included in Release 8, that is not the case. BellSouth approached AT&T on Friday November 10, 2000, with a specification that, if implemented, might provide a highly restricted

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procedures for ordering customized routing. This is also incorrect. As stated in my testimony above, AT&T has yet to receive footprint ordering instructions from AT&T.

capability for AT&T to submit some types of orders for OS/DA electronically during the course of a "friendly test" of UNE-P. In a teleconference held on Monday November 13, BellSouth confirmed that the capability would be limited specifically to the friendly test orders. No real AT&T customer orders can be placed, no other CLEC will have any capability, only certain order types would be allowed, and only routing to BellSouth's platform as unbranded would be allowed. Thus, BellSouth plans to provide only a very limited trial version of the production functionality that was cancelled.

Q. DID BELLSOUTH'S IMPLEMENTATION OF RELEASE 8 ON NOVEMBER 18, 1000 INCLUDE ANY ELECTRONIC OS/DA ORDERING CAPABILITY?

A. No. In fact, BellSouth was unable to provide even the test support capability described above. In its haste, BellSouth provided the line class codes in one office (the 5ESS in which AT&T is conducting its test) but developed the new software, screening, and lookup tables for another office (a DMS in the same wire center available to but not being used by AT&T). Thus, Release 8.0 provides no ability to electronically order any form of customized OS/DA routing – which has always been the case.[39] BellSouth's failure is documented in the

[39] It is important to remember, that even had BellSouth been successful the only capability that would have existed would have be limited to AT&T's UNE-P trial, in one office, using

e-mails I have attached as Exhibit JMB-9. BellSouth's failure provides stark proof that the procedures AT&T is requesting in this arbitration do not exist and are absolutely required to provide a commercially viable, timely and repeatable process.

Q. WHAT DOES AT&T REQUEST THE TRA TO ORDER REGARDING THIS ISSUE?

A. AT&T asks the TRA to order BellSouth to provide AT&T with specific documented methods and procedures for each of the customized routing methods it purports to offer: unbranded at BellSouth's platform, AT&T branded at BellSouth's platform, and routed to a non-BellSouth platform. The TRA also should require BellSouth to provide AT&T with the capability to place individual customer orders electronically, with flow through of such orders, and without the need to place line class codes or other indicators on the orders when only one arrangement exists in a given footprint area. AT&T is entitled to customized routing, and the methods it has requested are reasonable, technically feasible, and anticipated by the FCC. BellSouth should be required to provide these capabilities within 6 months of the TRA's order.

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only one interface (EDI), to provide only "unbranded" BellSouth OS/DA, could not be used with live customers (even by AT&T), and would not support all possible order types. Success would not have provided any production capability to any CLEC. It should also be noted that the provisioning of routing to "unbranded" BellSouth OS/DA does not constitute customized routing to an alternative provider's platform, the requirement that must be met to allow market-based pricing of BellSouth's OS/DA.

CUSTOMIZED ROUTING & OPERATOR SERVICES/DIRECTORY ASSISTANCE – ISSUE 14

Q. DID THE FCC ADDRESS THE ISSUE OF CUSTOMIZED ROUTING IN ITS ORIGINAL LOCAL COMPETITION ORDER?

A. Yes. In its Local Competition Order, the FCC required that "[a]n incumbent LEC must provide customized routing as part of the local switching element, unless it can prove to the state commission that customized routing in a particular switch is not technically feasible."[40]

Q. DID THE FCC ADDRESS THIS ISSUE IN ITS UNE REMAND ORDER?

A. Yes, in connection with its decision concerning Operator Services and Directory Assistance ("OS/DA"), the FCC determined that incumbent LECs remain obligated under the non-discrimination provisions of 47 U.S.C. § 251(c)(3) to comply with reasonable requests from CLECs who purchase OS/DA to rebrand or unbrand those services, and to provide directory assistance listing updates in daily electronic batch files. However, the FCC determined that incumbent LECs are not required to unbundle their OS/DA pursuant to 47 U.S.C. § 251(c)(3), ***provided that*** the incumbent LEC provides customized routing to CLECs to allow them to route traffic to ***alternate*** OS/DA providers.

[40] Local Competition Order at 15709.

Thus, the FCC requires BellSouth to provide customized routing as a pre-condition to being relieved of its obligation to offer OS/DA as a UNE.

From a practical standpoint, the customized routing architecture proposed by BellSouth must be fully implementable and available in every end office where technically feasible. It must be capable of supporting the request of any CLEC and be implementable on a central office basis in a very short period of time. It must be fully tested and clearly demonstrate that the implementation results in service equal to what BellSouth provides itself. It must be capable of supporting both branded and unbranded messaging and routing to non-BellSouth platforms.

Q. WHY ARE OS/DA AND CUSTOMIZED ROUTING CRITICAL TO AT&T?

A. Local operator and directory assistance services are integral components of any significant local service offering. Any CLEC must ensure that its customers can obtain the local OS/DA services that they have come to expect from the incumbent. Similarly, CLECs must have access at cost-based rates to the incumbent LECs' emergency and directory assistance listings, including timely and efficient updates

of those listings, in order to provide the quality of service local customers expect.

Q. HAS BELLSOUTH PROVIDED A TIMELY CUSTOMIZED ROUTING SOLUTION AS REQUIRED BY THE FCC, AND THE OTHER STATES WHERE BELLSOUTH OPERATES SO AS TO AVOID ITS OBLIGATION TO PROVIDE OS/DA AS UNES?

A. No. BellSouth has proposed line class code solution and an intelligent network ("AIN") solution for customized routing. The proposed AIN solution has been promised by BellSouth for several years. To date, BellSouth has not delivered on its promise. While AT&T did engage in a limited AIN test in 1997 with BellSouth, BellSouth has provided no information to indicate whether the proposed AIN solution it plans to implement later this year is the same or is different than that which was tested several years ago. (Exhibit JMB-1, page 3, depicts the AIN arrangement.)

In January 1998, BellSouth and AT&T jointly performed a technical test of an AIN solution during which both parties were present at a BellSouth facility. That trial identified call setup problems that increased post-dial delay to approximately one second for operator service calls and two seconds for directory assistance calls. This means that an CLEC customer whose calls are routed to that CLEC's

OS/DA platform will experience a post-dial delay that BellSouth's customers will not experience. Some of this delay is attributable to BellSouth's decision to direct all of the calls to BellSouth's AIN tandem. The AIN selective routing capability could be provided by the end office, eliminating the post dial delay associated with the tandem/hub arrangement. In addition, because AT&T will pay usage-based rates for originating calls through unbundling switching, modest increases in seconds of originating usage could, over time and thousands of calls, add up to significant costs that AT&T, but not BellSouth, will incur. To date, no CLEC operating in BellSouth's states has purchased AIN.

Q. WHAT ARE SOME INEFFICIENCIES OF THE AIN SOLUTION?

A. AIN was developed to enable enhanced line-based features such as selective call forwarding and multi-distinct rings, etc. It was not intended to support normal call routing and does not work well for high volume-based calling. AIN bypasses the intelligence of the switch and requires every single call to query the database for routing instructions. In addition, if the database is down or is slow in responding, the call will fail or be delayed. BellSouth has not clearly demonstrated that its proposed AIN solution is equal to what it provides itself.

Q. WHAT OTHER SOLUTION HAS BELLSOUTH PROPOSED FOR CUSTOMIZED ROUTING?

A. BellSouth has also proposed the use of line class codes to route OS/DA traffic to a third party platform.

Q. HAS BELLSOUTH DEMONSTRATED THAT THIS PROPOSAL MEETS THE NECESSARY REQUIREMENTS IN ORDER FOR BELLSOUTH TO NO LONGER OFFER OS/DA AS AN UNBUNDLED NETWORK ELEMENT?

A. No. As discussed above, while line class codes have been used to perform customized routing, BellSouth has not yet provided sufficient information such as ordering instructions and supporting documentation to AT&T for each of the customized routing options that BellSouth must provide. AT&T and BellSouth performed limited testing of this solution in 1997. However, several key issues still remain outstanding, which I discussed in issue 15 above. Use of LCC technology to route OS/DA calls to third party platforms is not currently available through a commercially viable, timely and repeatable process.

Q. DOES THE ORIGINATING LINE NUMBER SCREENING ("OLNS") OPTION PROVIDE A CAPABILITY TO ROUTE AN CLEC'S OS/DA CALLS TO THE THIRD PARTY PLATFORM?

A. No. As discussed above, OLNS can only be used to route calls to BellSouth's OS/DA platform. The OLNS option does not provide a basis for BellSouth to claim that it has met its customized routing obligations and therefore charge market based rates for its OS/DA service.

Q. HAS BELLSOUTH PROVIDED REASONABLE SUPPORT TO AT&T TO PROVIDE CUSTOMIZED ROUTING?

A. No. BellSouth's policy and proposed contract language precludes AT&T from obtaining customized routing that is efficient and economical. BellSouth limits AT&T and other CLECs to selecting a single "customized" routing for all of its customers across all nine states. Even if a CLEC agrees to a single option, BellSouth has not provided the information necessary to order that option across multiple central offices, or to order that option for an individual customer. Such a one size fits all approach precludes an CLEC from tailoring its selection of customized routing to take advantage of different (more efficient, less costly) trunking options that might be available to it in different local exchange areas, LATAs and states.

While BellSouth indicates that it will allow a CLEC to have more than one option, it apparently considers that to be something beyond its obligations under the Act – which it clearly is not – and once again has

provided no instructions, methods, procedures or ordering capabilities. AT&T must be able to route OS/DA calls to any specified, existing trunking arrangements. BellSouth must be able to route OS/DA calls using existing tandem architecture. BellSouth has not demonstrated that they can provide these capabilities. AT&T, as well as other CLECs, are entitled under the Act to flexible routing arrangements that will meet their current and future needs.

Q. AS A PRACTICAL MATTER, IS BELLSOUTH PROVIDING COMMERCIALLY VIABLE CUSTOMIZED OS/DA ROUTING OF CALLS TO NON-BELLSOUTH PLATFORMS FOR CLECS?

A. No. There is clearly not a commercially viable process and I do not believe there are a commercially meaningful number of installed arrangements. Mr. Milner's Georgia affidavit (Exhibit JMB-4) discussed above, provides volume information for the elements, products and services that BellSouth provides under each of the 14 Section 271 Checklist Items within Georgia and across its nine-state region. The discussion of customized routing, which appears in paragraphs 13-15, does not indicate that any such arrangements are in service. Mr. Milner has already testified in Florida that there are no working AIN arrangements in the nine-state region. Given BellSouth's inability to produce the process documentation that AT&T has

requested in this negotiation, there appears to be a total lack of working customized OS/DA routing arrangements.

Q. WHAT ACTION DOES AT&T REQUEST THE TRA TAKE ON THIS ISSUE?

A. BellSouth has not yet demonstrated that it has in place a customized routing solution that complies with all the requirements of the FCC and which allows AT&T to access OS/DA at parity with the access BellSouth has to its own OS/DA. Until BellSouth does so, the TRA should require BellSouth to continue to provide BellSouth provided OS/DA as unbundled network elements at unbundled network element prices.

ISSUE 17

THE CHANGE CONTROL PROCESS ISSUE

Q. WHAT IS A CHANGE CONTROL PROCESS?

A. A change control process (also known as a "change management process") is a process used to manage changes to a system, process, or documentation so that they are made in an orderly and predictable fashion. In the recent FCC BA-NY Order at ¶ 103 and in a September 27, 1999, letter to US West (Exhibit JMB-10) and hereinafter referred to as the "US West Letter"), the FCC describes the phrase "change

management process" as referring 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 that affect CLECs' production or test environments.

Q. WHY IS THIS ISSUE IMPORTANT TO AT&T?

A. Just as BellSouth requires time to make necessary modifications to its systems and processes, AT&T and other CLECs need sufficient advance notice of such modifications to allow them to make responsive changes in their own systems and processes and thereby continue to provide service to their customers. All too often, CLECs receive little or no notice of upcoming changes. In fact, AT&T has learned of some system or process changes only when previously acceptable orders were rejected or improperly provisioned. Similarly, CLECs request changes to BellSouth's systems and processes and need an orderly and predictable method by which such change requests will be handled. Thus, the quality of BellSouth's Change Control Process directly affects AT&T's ability to offer competitive service to its customers.

An extremely graphic illustration of problems resulting from inadequate change control processes occurred early this year in New York when Bell Atlantic – New York ("BA-NY") implemented changes

to its ECXpert software, which lies at the heart of its OSS system for provisioning UNE orders. These software changes were not properly managed through a robust change control process. Shortly thereafter, CLECs began reporting that BA-NY systems were losing CLEC service orders in increasingly large numbers. Despite extensive (and expensive) work-arounds, CLECs simply could not compensate for this massive problem, and tens of thousands of customers' orders were lost or delayed, including 40,000 AT&T orders.

On February 24, 2000, BA-NY finally announced that it could not correct the software problems in ECXpert, that the software was "inherently unstable and unscalable", and that the software would be abandoned. BA-NY proposed to replace ECXpert with a new and also untested system that was developed internally by Bell Atlantic to be introduced only four days later, on February 28th. Bell Atlantic explained that haste was required because continued use of ECXpert made it impossible for Bell Atlantic to satisfy industry standards in provisioning UNE orders. BA-NY further explained that it would be replacing ECXpert first in connection with LSOG 2 and then with LSOG 4, and that ECXpert would be abandoned throughout the entire Bell Atlantic operating territory

These problems could have been prevented by a change control process such as that being requested by AT&T. At the very least,

existence of an appropriate testing environment, go/no go decision point involving CLECs, and a versioning process would have mitigated this disaster.

Q. PLEASE DESCRIBE TYPES OF CHANGES THAT SHOULD BE MANAGED VIA A CHANGE CONTROL PROCESS.

A. Every change to a BOC's OSS, supporting process, or documentation that requires responsive changes in CLEC systems or processes should be managed via an orderly and predictable change control process. Such changes include:

1) Operations changes to existing functionality that impact the CLEC interface(s) when a BOC releases new interface software;
2) Technology changes that require CLECs to meet new technical requirements when a BOC issues a software release;
3) Additional functionality changes that may be used at the CLEC's option, when a BOC releases a new interface software;
4) Changes that may be mandated by regulatory bodies; and
5) Changes to correct defects and emergency situations.

In all such cases, supporting processes and documentation must be included and CLECs must have sufficient advance notice of BOC system changes to allow them to make responsive changes to their own systems.

Q. HAS THE FCC GIVEN BOCS AND CLECS ANY GUIDANCE ON THE MINIMUM ATTRIBUTES OF A SATISFACTORY CHANGE CONTROL PROCESS?

A. Yes. In both the FCC BA-NY Order and the US West Letter, the FCC describes additional characteristics of a satisfactory change management process, including:

- CLEC participation;
- Procedures documentation;
- Prioritization and stratification of changes;
- Schedules for notifications;
- A testing environment and minimum 30 day test window for new releases;
- A go/no go decision process to preclude premature implementation by the BOC;
- Versioning of releases (maintaining the old version of an interface along with the new);
- Memorialization of the process, including a means by which the process can be modified;
- Dispute resolution process for CLECs, specific to change management disputes;
- Followed consistently over time; and
- Subject to regulatory oversight (which includes enforcement).

From the FCC's descriptions, it is clear that the entire range of transactions required between AT&T and BellSouth in order for AT&T to utilize BellSouth's network services and elements should be managed via an orderly and predictable change control process. Both electronic and manual interfaces and processes are required to establish and maintain a business relationship with BellSouth and conduct day-to-day business transactions and all such processes should be managed by an orderly and predictable change control process. Exhibit JMB-11 visually depicts a comprehensive change control process.

A comprehensive change control process should provide "cradle to grave" coverage of the life cycle of an interface or process, as well as its supporting documentation (such as specifications, business rules, methods, and procedures). Thus, the change control process should control implementation of new interfaces, management of interfaces in production (including defect correction), and the retirement of interfaces. A robust change control process should provide a process for making normal changes, an exception process, an escalation process, and a dispute resolution process, with ultimate recourse to the state regulatory authority, mediation, or court adjudication.

Additionally, a process should be specified which could change the Change Control Process itself.

Q. DOES BELLSOUTH HAVE A CHANGE CONTROL PROCESS?

A. Yes, but the process is inadequate and BellSouth frequently fails to follow it. The charter for the development of a change control process grew out of CLEC complaints to the Georgia Public Service Commission ("PSC") regarding inaccuracies and omissions in the information available to them concerning interfaces that existed in late 1997. Thereafter, BellSouth and several CLECs, including AT&T, signed the Electronic Interface Change Control Process ("EICCP") document ("the change control document") in April 1998. The change control document, which was produced only as a result of regulatory "prodding" of BellSouth by the Georgia PSC, and useful at the time, was extremely limited in scope and was insufficient to meet the current and future needs of CLECs or the requirements of the FCC. For example, it encompassed only BellSouth's existing interfaces and did not apply to new interfaces until they were deployed. Thus, BellSouth was free to introduce new interfaces without appropriate notice to and input from the CLECs that would use those interfaces. In February 2000, BellSouth began developing an Interim Change Control Process ("I-CCP") in response to certain findings by KPMG in the Georgia Third Party OSS Test. The I-CCP was an evolving work

in progress, and BellSouth replaced the EICCP procedures with I-CCP procedures in near real-time and often without the full concurrence of the CLECs participating in the process. While the I-CCP attempted to address the shortcomings of the EICCP BellSouth's future adherence to any change control process requirements is speculative.

The designation of the I-CCP document and process as "interim" was removed following a controversial vote taken in August 2000, despite the fact that a key section regarding defects and expedites was still only in draft form and that these was no consensus agreement regarding the contents of the remainder of the document.[41] BellSouth published Version 2.0 of the Change Control Process Document on August 23, 2000, and it remains the current version today.

Through their participation in the process, AT&T and BellSouth have reached agreement on many elements of change control. However, the CCP in its current form is still deficient in many areas, as will be discussed below. Version 2.0 of the CCP, dated August 23, 2000, and marked up on October 27, 2000, is attached as Exhibit JMB-12 to show changes proposed by AT&T (and in which other CLECs have

[41] BellSouth issued an agenda for a Change Control conference call that included a "discussion" of the Interim Change Control Process, among other things. After the discussion, however, and at the end of the lengthy conference call, BellSouth called for a vote on whether to accept the interim process as permanent. Because there had been no notice that a vote would be taken, several participants had dropped off the call by this point, and still others were without authority to vote on behalf of their company. Despite these irregularities, however, BellSouth has refused to allow a re-vote.

concurred.) AT&T has submitted a formal Change Request to BellSouth, requesting adoption of the changes shown in Exhibit JMB-12.[42]

Q. DOES BELLSOUTH'S VERSION 2.0 CHANGE CONTROL PROCESS ("CCP") COMPLY WITH THE FCC'S GUIDANCE?

A. No. The CCP fails to cover all areas that should be included in a robust Change Control Process. Specifically, the I-CCP is deficient when compared to the FCC's guidance in the following ways:

- It does not adequately cover the introduction of new interfaces; (see discussion below in section a)
- It does not adequately cover retirement of existing interfaces; (see discussion below in section b)
- It does not provide a process for exceptions to the Change Control Process; (see discussion below in section c)
- It does not provide an adequate process for defect correction; (see discussion below in section e and f)

[42] BellSouth elected not to schedule discussion of this request during regular monthly Change Review Status meetings, as called for in the existing process. Instead, BellSouth insisted that the CLECs conduct their own meeting to discuss AT&T's Change Request. All CLECs that participate in the Change Control Process were invited to the meeting, as were several BellSouth representatives. The meeting, which was held on October 27, 2000, was attended by representatives of the core group of participating CLECs, all of whom concurred in the changes shown in Exhibit JMB-12.

- It does not provide an adequate process for managing changes to documentation and training; (see discussion below in section d)
- Its cycle times for all types of changes are too long; (see discussion below in section g)
- It does not include a firm notification schedule for all changes initiated by BellSouth; (see discussion below in section h)
- It does not include an adequate escalation process; (see discussion below in section j)
- It does not include an adequate dispute resolution process; (see discussion below in section i)
- It does not provide a means to implement changes in testing procedures; (see discussion below in section k)
- It does not provide for a pre-release testing environment; (see discussion below in section k)
- It permits BellSouth to unilaterally cancel, reject or reclassify CLEC submitted change requests; (see discussion below in section m)
- It permits BellSouth to unilaterally implement changes on a schedule that is inconsistent with the prioritization of requests by the CLECs; (see discussion below in section n)

- It does not include a defined process by which the process itself can be changed through an orderly, informed vote by all interested parties; (see discussion below in section o) and
- It is neither binding upon BellSouth nor subject to regulatory oversight.

Additionally, BellSouth historically failed to follow even the limited process prescribed in EICCP and this behavior has continued under the I-CCP and CCP. BellSouth failed to adhere to the EICCP when implementing the following types of changes to its systems, even though EICPP provided a process for managing them:

- New and revised edits;
- Documentation and training changes;
- Regulatory required changes; and
- Changes BellSouth wished to initiate.

Each such change has the potential to disrupt CLEC processes and systems and adversely affect provision of service to CLEC customers.

Q. HOW ARE CHANGE REQUESTS PROCESSED UNDER THE CHANGE CONTROL PROCESS?

A. Under Version 2.0 of the CCP, a Change Review Committee composed of BellSouth and CLECs meets three or four times annually, based on a schedule prepared by BellSouth, to review and

prioritize change control requests. Monthly status meetings are held between prioritization meetings. In order for Type 2-5 (non-emergency) changes to be considered at any given prioritization meeting, they must be submitted some 33 business days in advance of the meeting. Changes that are accepted for implementation at the Change Review meeting may appear in a "release package" (which lists the requests that have been targeted for a scheduled release) approximately 35 business days after the Change Review meeting, and the implementation process can begin.

BellSouth's change control calendar establishes specific intervals for all aspects of the process, including cut-off dates for submission of change requests before a particular Change Review meeting. Requests made after the cut-off date generally will be reviewed only at the next meeting. Under the current change control calendar, the minimum time between the submission of a change control request and the issuance of a "release package" is over three calendar months, and could be more than six months. That period does not include the date of actual implementation of the change. Not only is this totally inadequate to meet CLEC needs, but it also offers BellSouth a competitive advantage in that BellSouth can (and often does) change its systems and processes at any time, without regard to Change Review meetings, and to the detriment of CLECs.

Q. COULDN'T THIS AUTHORITY SIMPLY DEFER THIS ISSUE TO THE CLECS AND BELLSOUTH TO RESOLVE?

A. No. While BellSouth will argue that this is an industry issue, and that it should be managed through the Change Control Process, the fact of the matter is that BellSouth has total control over the process and may simply ignore the business needs and wishes of the CLECs. BellSouth has no legally binding commitment to follow the process or to abide by any CLEC vote, and neither the Change Control Document nor the process itself is subject to regulatory oversight.

The CCP process is often described as a "collaborative" process. While it is true that AT&T and the CLECs continue to work with BellSouth to improve the CCP, the process is not collaborative. CLECs advise what they need, BellSouth either agrees, agrees but later changes its mind, or says no. In essence, BellSouth retains veto power. Following is an example that illustrates BellSouth's control over the process.

During the June 28, 2000, Prioritization Meeting, CLECs prioritized 23 change requests for inclusion in future releases. Five were associated with pre-ordering and 18 with ordering. The existing process calls for a Release Package Meeting to be held 30 business days after the

Prioritization Meeting. The purpose of a Release Package Meeting is to inform the CLECs how the prioritized changes have been scheduled for implementation over the future releases and initiate the release management project team. This meeting, which should have been held on August 14, was not held until September 18 – delaying CLEC change requests by an additional month.

Further, BellSouth did not comply with the CCP requirement that "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." Instead, BellSouth unilaterally included only 6 items in its Proposed Release 8.0 Package, none of which dealt with pre-ordering, and four of which were not highly prioritized items, including three of the lowest priority items from the ordering list. Exhibit JMB-13. Many of the items BellSouth elected not to address have been highly prioritized for implementation by the CLECs in past cycles, going back as far as two years.

In addition to its ability to control the process, BellSouth also routinely elects not to comply with its requirements. BellSouth recently released Issue 9G of BellSouth's Business Rules for Local Ordering ("BBR-LO") which it admits includes significant changes that BellSouth

did not submit to the CCP. (Exhibit JMB-14) Because BellSouth circumvented the CCP, CLECs had little advance notice of the changes, and could not make the required coding and process changes by the proposed October 2, 2000, implementation date, which would result in BellSouth's systems rejecting their previously valid orders. BellSouth nevertheless refused to withdraw these unapproved changes and implemented the release on October 2, 2000, causing rejection of CLEC orders. Further, the release contained programming defects (Exhibit JMB-15) that could have been avoided had BellSouth made the release available to CLECs for testing in advance of its implementation.

Q. IS THERE ANOTHER EXAMPLE WHY THE TRA SHOULD NOT SIMPLY DEFER THIS ISSUE TO THE CLECS AND BELLSOUTH TO RESOLVE?

A. Yes, BellSouth's handling of AT&T's Change Request CR-171 (that submitted Exhibit JMB-12 to the CCP for review) demonstrates that BellSouth has the power to ignore the requirements of the CCP with impunity.

On September 9, following the procedures outlined in Section 9 of Version 2.0 of the CCP, AT&T submitted a change request to modify

the change control process. Section 9 of the CCP states that such a change request is to be discussed at the next monthly Status Meeting, which was scheduled for September 27, 2000. Rather than comply with the CCP, BellSouth instead unilaterally decided to establish a new, additional meeting it calls the "CCP Process Improvement Meeting" (Exhibit JMB-16, September minutes) to be held on October 17, 2000.

At the October 17th Meeting, BellSouth introduced and entertained discussion of a number of other items related to changes that might bring about improvement of the CCP process and suggested that AT&T and the CLECs hold an additional meeting to discuss AT&T's change request before the next CCP- Process Improvement Meeting on November 1, 2000. Exhibit JMB-17 (October Minutes).

On Octobrer 27, 2000, AT&T and the CLECs (as well as invited BellSouth representatives) held the separate meeting suggested by BellSouth. During this meeting, all of the CLECs present reached agreement on the language in AT&T's Change Request. At the November 1 meeting, however, BellSouth once again effectively deferred meaningful discussion of CR-171 until a meeting to be held on December 7, 2000 meeting. Exhibit JMB-18 and Exhibit JMB-19 are the minutes of the AT&T/CLEC October 27th meeting and the

November 1st meeting. The Red-line Version 2.0 of the CCP document referred to in both minutes is identical to my direct Exhibit JMB-12 and includes the language agreed to by all CLECs participating in the October 27th meeting.

On November 5, 2000, AT&T provided BellSouth with a document that shows the language to which the CLEC community agreed on November 1, 2000. (Exhibit JMB-12). BellSouth was a participant in both the October 27th CLEC meeting, and the November 1st CCP Process Improvement Meeting, and had the latest AT&T/CLEC proposal in its possession more than 30 days before the scheduled December 7 CCP Process Improvement Meeting. However, BellSouth did not respond in any way until 5:55 PM on December 5, 2000 - effectively one day before the meeting – at which time it produced a significant and substantial mark-up of the October 27 document to which the CLEC's had concurred. BellSouth's response is Exhibit JMB-20

During the December 7th meeting, BellSouth allocated three hours to a discussion of this issue. Not surprisingly, the discussion did not conclude on the 7th and the issue will now next be discussed on January 10, 2001 – four months after AT&T submitted its change request.

BellSouth's self-initiated CCP-Process Improvement Meetings may be well intentioned, and may be a useful process, but they are not part of the documented process. AT&T notes the following regarding the meetings:

1. Full consideration of AT&T's CR 171, submitted on September 9, 2000, has been delayed by at least four months.
2. Although BellSouth appears to have agreed to various changes to the CCP during these meetings, those changes have not been documented via a change request and subsequent update to the CCP Version 2.0 document as is required by Section 9 of that document.
3. There is no documented process for reaching agreements via the CCP Process Improvement Meetings.

Thus, BellSouth has successfully re-instituted the ad hoc process that the CCP was designed to avoid, and which resulted in the irregular adoption of Version 2.0 in the first place. Once again, BellSouth has demonstrated its unique ability to circumvent the process requirements due to lack of any binding commitment.

AT&T asks this Authority to specifically order BellSouth to adopt the changes requested herein, and to specifically place the Change Control Document under its supervision. It should be no more difficult to avoid state-to-state conflicts regarding this process than any other process incorporated into an Interconnection Agreement or into BellSouth's Statement of Generally Available Terms and Conditions ("SGAT").

Q. YOU MENTIONED THAT YOU WOULD INTRODUCE A MARK-UP OF VERSION 2.0 OF THE CHANGE CONTROL PROCESS DOCUMENT. PLEASE TELL US WHY.

A. Following the August 23, 2000, Monthly Status Meeting, BellSouth produced Version 2.0 of the CCP document, incorporating all of its desired changes, whether or not CLECs concurred. For example, BellSouth incorporated into Version 2.0 a draft process to which no CLEC has concurred, identified as an "expedited feature process". Version 2.0 is now the process document in use and is therefore the appropriate document to discuss in this arbitration. If BellSouth publishes an update to the CCP document before the TRA's decision, that new version should then supplant Version 2.0 as the baseline for a decision.

The red line of Version 2.0 included with this testimony (Exhibit JMB-12) is the same as that concurred in by the CLECs on October 27th and November 1 and provided to BellSouth on November 5, 2000.

Substantive changes appear on 41 of 72 pages of the document, but often the same change appears on multiple pages.[43] It is this document that the TRA should use as its baseline in reaching its decision on this matter, as it shows the most current positions of the parties. As noted above, if BellSouth publishes an update to the CCP document, that new version should then supplant Version 2.0 as the baseline for this Authorities' decision.

In the following discussions, I will indicate the location and general content of the revised language associated with each sub-issue under discussion. Exhibit JMB-21 provides a cross reference of revisions to sub-issues and concerns.

a) introduction of new interfaces;

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO INTRODUCTION OF NEW INTERFACES?

[43] This page count, and the page numbering reference below are valid when the red-line document is printed on an HP Laser 4 printer. Use of another printer may result in a different numbering.

A. Certain language in the CCP effectively would allow BellSouth, rather than the CLEC community, to determine whether to the introduction of new interfaces should be managed under the CCP document. This is unacceptable; the process of developing and introducing new interfaces should be managed under the process, just as changes to existing interfaces are managed under the process. Failure to proceed under the CCP should be an exception to the process, not part of the process itself. On page 48 of Exhibit JMB-12, AT&T has proposed deleting this language and adding language specifying that BellSouth will seek to follow the CCP for all changes originated by BellSouth. I understand that there may be times when that is not possible, so I have provided language requiring BellSouth to notify CLECs as promptly as possible if it is forced to deviate from the process.

Q. WHY DO AT&T AND OTHER CLECS BELIEVE THAT BELLSOUTH'S DEVELOPMENT AND INTRODUCTION OF NEW INTERFACES SHOULD BE COVERED BY THE CCP?

A. New interfaces are developed to meet CLEC business needs. The best way to ensure that new interfaces and processes meet CLEC business needs is to manage their development and introduction through the CCP. BellSouth's exclusion of the development of new

interfaces and processes from the EICCP caused repeated deployment of interfaces and processes that did not meet CLEC needs and wasted the industry's limited resources.

Q. CAN YOU PROVIDE EXAMPLES?

A. Yes. AT&T's customers have been victimized by BellSouth's secretive development of new OSS interfaces, specifically, BellSouth's Local Number Portability Gateway ("LNP-GTWY") and the processes supporting local number portability ("LNP"). I will provide two examples.

Caller ID Display Failure: Dillard's Department Stores purchases local services from AT&T at many of its locations in BellSouth's nine-state region, including Tennessee. Like most businesses, Dillards kept the same telephone numbers that it used when its local service was provided by BellSouth. Shortly after converting local service to AT&T, Dillards and AT&T discovered that the Dillards name was not displayed on customers' Called ID units when employees called them. This was highly unsatisfactory to Dillards, because many people simply will not answer the telephone unless they know who is calling. This problem, and the resulting dissatisfaction of AT&T's customer, could have been avoided had BellSouth's new Local Number

Portability Gateway and new processes supporting local number portability ("LNP") been developed and introduced through the CCP.

This matter is currently before the TRA as a complaint under Docket No. 00-00971, so I shall limit my discussion here to the current bottom line: This problem still has not been resolved to AT&T's satisfaction. Upon urging by AT&T, BellSouth provided a database "fix" for Dillards, and proposes a software interface connection as an interim solution to the underlying problem. AT&T objects to the interim solution, which would require AT&T and other CLECs to spend software development dollars on a "throw away" project. Moreover, BellSouth refuses to provide the temporary database "fix" for any additional telephone numbers "until AT&T has returned the completed forms necessary to allow BellSouth to begin the implementation of the [interim] mechanized solution". Exhibit JMB-22. As I stated above, these problems could have been avoided had BellSouth developed and introduced the new gateway and processes through the CCP.

Erroneous Number Reassignment: AT&T's customers also are being negatively affected by another defective process associated with local number portability that should have been avoided by open discussion in the CCP. When numbers are "ported away" from BellSouth to a CLEC, BellSouth must continue to account for the status of that

number in its ATLAS database. AT&T and a number of its customers have found out the hard way that BellSouth returned many ported numbers to an assignable status in ATLAS, which allowed BellSouth to reassign working AT&T numbers to new BellSouth service. AT&T's customers, of course, were outraged at what they perceived as AT&T's failure to provide adequate service. In Exhibit JMB-23, I provide a number of e-mails and letters concerning customers who were affected in October 2000, despite the fact that BellSouth implemented edits and procedures in December 1999, to eliminate this very thing.

Unfortunately, BellSouth continues its practice of developing and implementing new interfaces and processes outside of the CCP. In my discussion of Issue 19 below, I discuss three maintenance and repair interface developments that are currently underway without the aid of the CCP.

b) retirement of existing interfaces;

Q. WHAT CHANGES DOES AT&T REQUEST REGARDING RETIREMENT OF EXISTING INTERFACES?

A. It appears that the parties have reached agreement on a portion this issue. BellSouth's language regarding the retirement of interfaces may be found on page 48 of Exhibit JMB 10. This language has been enhanced by BellSouth and is now acceptable to AT&T.

During the October 27 and November 1, 2000 meetings, the CLECs reached consensus on additional language related to the retirement of versions of software as opposed to retirements of interfaces. This proposed language also appears beginning on page 48.

c) exceptions to the process;

Q. WHAT CHANGES DOES AT&T REQUEST REGARDING EXCEPTIONS TO THE CHANGE CONTROL PROCESS?

A. AT&T requests a documented "exception" process for the handling of Type 2 – 5 Changes under unusual situations. AT&T's request may be found on pages 30-34 of Exhibit JMB-12 as Part 3 to Section 4 and titled "Part 3 – Types 2-5 Exception/Expedited Feature Process."[44] In the interval between the publications of the Interim CCP Versions 1.4 through 1.6, BellSouth separately proposed a draft "Expedited Feature" process. BellSouth's proposal was included in Version 2.0 in Section 5 and elsewhere despite objections from various CLECs. (Exhibit JMB-24) Although BellSouth's proposal is unacceptable as

written, it appears to be a foundation upon which the "exceptions" process the CLECs have been requesting can be built. AT&T has proposed modifications that would make the process acceptable.

Adoption of AT&T's proposed changes will provide the CLECs and BellSouth with an acceptable documented "exception" and "expedited" process for the handling of Type 2 – 5 Changes.

d) documentation, including training;

Q. WHERE MAY AT&T'S DESIRED CHANGES RELATED TO THIS ISSUE BE FOUND AND WHAT DO THEY REQUEST?

A. The phrase "training materials and job aids" has been added on page 7 of Exhibit JMB-12 to clearly indicate that changes which will result in revisions to the training materials and job aids BellSouth produces for CLECs are included within the scope of the process. Exhibit JMB-25 is a copy of KPMG's Florida Third Party Test Exception 9 and BellSouth's response that deals with BellSouth's failure to document its CLEC training process. The procedures outlined in BellSouth's response are clearly newly minted.

e) defect correction;

[44] Additional related changes occur on pages 11 and 12.

f) emergency changes;

Q. WHAT CHANGES DOES AT&T REQUEST REGARDING DEFECT CORRECTION AND EMERGENCY CHANGES?

A. In this testimony I have grouped these two sub-items together because emergency changes are a sub-set of defect correction. AT&T proposes language changes at various locations to reflect AT&T's and other CLECs' needs for a process that corrects defects in a timely manner. BellSouth's existing and proposed process (found largely in Section 5 of Version 2) remains focused on notification and contains excessively long intervals for correction. The "Draft Expedited Feature Process" proposed by BellSouth is applicable neither to defect correction nor emergency changes. AT&T's proposed language may be found on pages 34-43 of Exhibit JMB-12.

A significant change in the definition of a defect appears on page 34. This change resulted from CLEC input during the October 27th and November 1st meetings. A third bullet point was added to address the situation where the interface was working in accord with both of the conditions in the first two bullets but still produced ineffective transactions.[45]

Adoption of AT&T's proposed changes will provide CLECs and BellSouth with a documented defect correction and emergency change process that meets their stated needs and is near parity with the processes BellSouth uses in its own retail and wholesale operations. Collectively the changes AT&T proposes here and in sub-issue (c) above combine to provided CLECs with capabilities they have been formally requesting from BellSouth since July of 1999.

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-12:

Page	Nature of AT&T Proposed Change
21 and 23	reduction in Step 3 interval from 20 to 10 business days

[45] The new language treats as a defect the situation "where technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data." The definitions

	21 and 26	reduction in Step 7 interval from 30 to 25 business days

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

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO NOTIFICATIONS?

A. When BellSouth initiates Type 4 changes[46], it should prepare and distribute requirements and specifications according to the schedules shown on page 22 of Exhibit JMB-12 and in the associated Table 4-3. The requested interval of 90 days advance notice for distribution of draft requirements and specifications is particularly critical as, CLECs otherwise may not have sufficient time in which to complete required system and process modifications on their side of the affected interface.

In its recent approval of the SBC 271 application for Texas, the FCC found the inclusion of a schedule for the distribution of draft specifications or business rules to be significant.[47] In its Order approving Southwestern Bell's 271 application, the FCC discussed

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of defect on pages 12 and 63 also change to include this language.

[46] A type 4 change is a request initiated by BellSouth.

[47] FCC 00-238, Order Approving SBC Communications Inc. Section 271 Application ("FCC SBC Order"), para.111.

with approval particular provisions of Southwestern Bell's change control process. The FCC specifically noted that "the change agreement includes a schedule for the distribution of draft specifications, or business rules, receipt of competing carrier comments on the documentation, and distribution of final documentation that is based on the consensus of the parties."[48] In contrast, BellSouth has refused to provide CLECs with draft specifications. (Exhibit JMB-26)

In addition, on page 28 of Exhibit JMB-12, AT&T is requesting firm implementation intervals for both software-related and documentation-related issues under the normal Type 2-5 change process. The Type 2-5 Exception/Expedite process, which is described in Section 4, Part 3 (pages 30-35), is available for those instances in which the requested normal interval might not be appropriate.

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

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO DISPUTE RESOLUTION?

A. The dispute resolution provisions found on page 55 of Exhibit JMB-12 become effective if an issue is not resolved through the Escalation

[48] FCC Southwestern Bell Order at paragraph 111.

Process specified in the document, so the two processes must be considered together. The use of the escalation process ensures that neither party will bring forward an issue for mediation or as a formal complaint unless it has been appropriately and jointly investigated.

j) a process for escalation of changes in progress.

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO ESCALATION OF CHANGES IN PROGRESS?

A. AT&T has added specific intervals on pages 50 and 53 of Exhibit JMB-12 for various steps in the escalation process, so issues with more severe CLEC impact receive faster attention, while issues with less severe impact have a longer resolution interval.

k) The Process of Changing the Process.

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO THE PROCESS OF CHANGING THE PROCESS?

A. The current document actually provides no procedure at all for amending or changing the change control process, and therefore repeated situations such as occurred on August 23, 2000 discussed above are likely to occur. At page 56 of Exhibit JMB-12, I have provided language that provides for an orderly, informed vote on

requested changes. The proposed process requires a supermajority (2/3) vote in favor of any change thus protecting BellSouth from whimsical CLEC behavior.

Other Concerns

l) Testing Support and Testing

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO TESTING SUPPORT AND A TESTING ENVIRONMENT?

A. During the recent arbitration hearing between AT&T and BellSouth in North Carolina, the parties reached an agreement regarding certain changes to these sections. Unfortunately, the language in BellSouth's proposed Version 2.0 does not comport with that discussion. The mark-ups proposed by AT&T correctly memorialize that discussion and are shown on pages 8 and 57 of Exhibit JMB-12.

m) Provision of a Trouble Number for Type 1 Events

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO TYPE 1 EVENTS?

A. BellSouth has agreed to provide the process requested by AT&T, but that agreement is not reflected in Version 2.0. I have added supporting language for this agreement at page 18 of Exhibit JMB-12.

n) The Ability of BellSouth to Unilaterally Cancel or Reject an CLEC Request

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO THE CANCELLATION, REJECTION OR RECLASSIFICATION OF A CHANGE REQUEST?

A. As presently written, the change control document effectively gives BellSouth up-front veto power over any change request submitted by CLECs. This is unreasonable; changes submitted by CLECs should not be subject to arbitrary cancellation or rejection by BellSouth. Instead, all Type 5 CLEC-submitted changes should progress to the Monthly Status Meeting Stage. BellSouth should provide the appropriate Subject Matter Expert and present its case for cancellation/rejection to the industry at that time. Following input from the industry, BellSouth and the originating CLEC will determine the disposition of the change request in question. Without this process, BellSouth retains up-front veto power over all CLEC change requests, thus limiting the scope and effectiveness of the process. I have added

supporting language for this requirement at pages 23 and 24 of Exhibit JMB-12.

o) Change Review – Prioritization – Release Package Development and Approval

Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO CHANGE REVIEW MEETINGS, PRIORITIZATION AND RELEASE PACKAGE DEVELOPMENT AND APPROVAL?

A. AT&T's proposed language is shown on pages 25-27 and pages 44-47 of Exhibit JMB-12. Type 2-5 changes must drive the need for and content of future software releases in order to provide certainty to the process. The present process, however, is driven by an arbitrary release schedule developed without input from the affected CLECs or the CCP. AT&T's suggested language establishes fixed points for prioritization meetings, and requires all prioritized change requests to be assigned to specific future releases. The process requested by AT&T remains flexible, however, since change requests may be reassigned to a different software release by group consensus during any Release Package Meeting.

Q. PLEASE SUMMARIZE AT&T'S REQUEST FOR SPECIFIC CHANGES TO BELLSOUTH'S CHANGE CONTROL PROCESS.

A. AT&T asks this Authority to order BellSouth to incorporate the following attributes in its Change Control Process.

1. It should cover the following processes:
   - changes to manual as well as electronic processes, whether sought by BellSouth or by CLECs;
   - introduction of new interfaces;
   - billing; and
   - retirement of existing interfaces and software versions.
2. It should provide processes for the following issues:
   - defect correction;
   - exceptions to the Change Control Process;
   - escalation of change requests;
   - interpretation and clarification of operational documentation; and
   - dispute resolution.
3. It should provide for a permanent test environment and the ability to change the testing process.
4. It should require cycle times that produce monthly prioritization meetings between BellSouth and CLECs and a maximum time of 60 calendar days from submission of a Type 2-5 change through its inclusion in a release package, with a process for more frequent meetings as necessary.

5. It should include a firm notification schedule for changes initiated by BellSouth.

6. It should be legally binding upon BellSouth and subject to regulatory oversight to ensure that BellSouth can not ignore change control processes with impunity.

Q. WHAT DOES AT&T REQUEST THAT THE TRA DO REGARDING THIS ISSUE?

A. AT&T requests that the TRA correct these deficiencies by adopting the revisions to the CCP attached as Exhibit JMB-12 to my testimony in the context of whatever is the then-most-current version of the Change Control document (Version 2.0 at this writing).

ISSUE 18

THE EQUIVALENT FUNCTIONALITY ISSUE

Q. PLEASE EXPLAIN AT&T'S REQUEST FOR EQUIVALENT OSS FUNCTIONALITY.

A. In Issue 18, AT&T requests a number of OSS improvements that have been at issue between the companies for some time. Although repeatedly requested by AT&T, BellSouth has yet to provide AT&T with OSS functionality it provides to itself to support the quality of service enjoyed by BellSouth's retail customers. BellSouth enjoys the

benefits of a suite of interconnected databases and computer processing systems of its own choosing and designed as best possible to enhance the efficiency and effectiveness of its operations. Even when manual processes are required, BellSouth is able to design such processes to take maximum advantage of the available computing, database, and communications power it possesses.

AT&T, on the other hand, when attempting to access BellSouth's databases, computer processing, communications resources, and manual processes, is restricted by BellSouth's unwillingness to provide parity to its competitors. Throughout the life of the existing AT&T–BellSouth Interconnection Agreement, AT&T has repeatedly sought to obtain access that would allow it to have functionality equal to that enjoyed by BellSouth.

Section 251 of the 1996 Act clearly envisioned that ILECs like BellSouth might be inclined to be less than fully cooperative in many cases, and therefore authorizes state commissions to address this situation through arbitration. In this Arbitration, AT&T asks the TRA to mandate implementation of equivalent functionality for the following three conditions:

- Parsed customer service records;

- The ability to submit orders electronically for all services and elements; and
- Electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel.

Exhibit JMB-27 depicts the interrelationship of these conditions and AT&T's desired resolutions.

Q. PLEASE EXPLAIN WHY AT&T REQUIRES BELLSOUTH TO PROVIDE PARSED CUSTOMER SERVICE RECORDS.

A. AT&T needs this functionality in order to fully integrate its ordering systems with BellSouth's, thereby obtaining the functionality now available to BellSouth. BellSouth's internal systems parse the sections and fields of the CSR as needed to meet software program requirements, thus precluding the need for service representatives to re-enter CSR information when processing orders. Additionally, BellSouth should provide parsed customer service records for preordering pursuant to industry standards. Parsing rules for CSRs have been included in industry standards since the publication of the LSOG3/TCIF9 guidelines July, 1998.

Q. PLEASE EXPLAIN WHAT YOU MEAN WHEN YOU SAY THAT AT&T WANTS BELLSOUTH TO PROVIDE PARSED CUSTOMER SERVICE RECORDS.

A. We are asking BellSouth to provide us with electronic customer service record data that is divided up into fields that BellSouth's systems can recognize when we return it to BellSouth. For example, BellSouth provides us with the customer's listed name as one field, or block, of data. But when we order listing service for that customer, BellSouth requires us to enter the customer's name in at least two fields instead of one. So we have to separate the information manually, which takes time and costs extra money. BellSouth's service representatives do not have to do this, so AT&T is requesting (and is entitled to) the same functionality.

Q. PLEASE EXPLAIN WHY AT&T REQUIRES THE ABILITY TO SUBMIT ORDERS ELECTRONICALLY.

A. BellSouth can place an electronic order for every service and product that it provides to its own customers. AT&T requires this same ability in order to compete against BellSouth. Lack of electronic ordering increases the possibility of errors, extends intervals, increases costs, and reduces CLECs' ability to compete due to the required (but unnecessary) manual intervention by both CLEC and BellSouth personnel.

Although I have listed electronic ordering as a desired functionality, the ability to submit orders electronically for all services and elements

and the ability to have all electronically submitted orders processed without subsequent manual intervention, which is discussed below, are sequentially and dependently related - it is impossible to have the second ability until the first has been provided. Ideally, both should be provided simultaneously because BellSouth possesses both capabilities for every service and product that it provides to its own customers.

BellSouth has argued that it already offers equivalent functionality to AT&T because BellSouth uses some manual steps in its own internal processes. But the manual processes BellSouth describes involve pre-ordering, not ordering. Further, BellSouth has admitted that its service representatives can order every retail service electronically. AT&T seeks that same ability. Despite BellSouth's own capabilities, however, it has continually refused to provide fully electronic ordering capability to CLECs, let alone fully automated processing of electronically submitted orders, despite the fact that it provides these capabilities to itself.

Q. PLEASE EXPLAIN WHY AT&T REQUIRES ELECTRONIC PROCESSING AFTER ELECTRONIC ORDERING, WITHOUT SUBSEQUENT MANUAL HANDLING BY BELLSOUTH PERSONNEL.

A. The short answer is because this is how BellSouth's own orders are processed and that without parity AT&T and the other CLECs cannot be competitive in the market place. Because electronic ordering and processing is less expensive, faster, and less prone to errors than manual ordering and processing, BellSouth's electronic ordering and processing capability puts CLECs at a competitive disadvantage.

Q. HOW DOES BELLSOUTH PROCESS ITS OWN SERVICE REQUESTS?

A. Exhibit JMB-28 depicts the methods by which BellSouth submits its customers' requests to its legacy computer systems. In Tennessee, BellSouth uses the Regional Negotiation System ("RNS") as the primary front-end system to input residential service requests and uses the Regional Ordering System ("ROS") as the front-end system for all business service requests[49]. The legacy system to which both RNS and ROS send their requests is the Service Order Control System ("SOCS"). SOCS assigns service order numbers to each request and processes all requests received through an edit program known as the Service Order Edit Routine ("SOER"). If, and only if, the service request passes the SOER edits does it actually become a

[49] The system that ROS replaced during 1999, the Service Order Negotiation System ("SONGS"), has been retained by BellSouth for two purposes since it can be used to input any type of service request (business, residential, or UNE). These two uses are as a secondary input system in BellSouth retail residence operations, and as the interface used in the Local Carrier Service Center ("LCSC") to input CLEC manual and electronically submitted "designed fallout" local service requests.

service order, which SOCS then can provide to BellSouth's downstream provisioning legacy systems. A service request that has become a service order is said to be an "Assignable Order" and is referred to as having reached "AO" status. A service request that does not pass the SOER edits is rejected and returned to the originating BellSouth input center for correction.

In order to minimize the number of RNS and ROS service requests that are rejected by the SOER edits in SOCS, BellSouth has provided editing and formatting software in RNS and ROS. This software prevents BellSouth employees from sending service requests that have certain errors. In the RNS system, these software programs are known as the FID and USOC Edit Library[50] ("FUEL") and the Service Order Layout and Assembly Routine ("SOLAR"). In the newer ROS UNIX application this edit software is not separately identified.

Once a BellSouth representative has gathered and arranged all of the information necessary to place a service request on behalf of a BellSouth retail customer, a process known as pre-ordering, the employee types the order into RNS or ROS. If the pre-ordering information is accurate and the employee has made no input errors, the service request will pass the RNS or ROS edits, be forwarded to

[50] FID stands for Feature Identification, USOC for Uniform Service Order Code.

SOCS, pass the SOER edits, obtain AO status and be distributed as necessary to BellSouth's downstream legacy systems. Thus, barring error, all BellSouth services and products can be requested and ordered as the result of the typed input of a single employee. AT&T seeks this same capability, which I shall refer to as "Flow-through Ordering".

Q. DOES BELLSOUTH PROVIDE FLOW-THROUGH ORDERING FOR ALL SERVICES AND ELEMENTS TO AT&T AND THE OTHER CLECS, AS IT DOES FOR ITSELF?

A. No. BellSouth has provided Flow-Through Ordering for some services and elements, but many other services and elements must be manually ordered, manually processed, or both.

Q. PLEASE EXPLAIN HOW BELLSOUTH RECEIVES AND PROCESSES CLEC SERVICE REQUESTS.

A. Exhibit JMB-29 depicts the methods by which BellSouth processes service requests submitted by CLECs into service orders. CLECs each have their own front end systems to prepare their service requests, which then are sent to BellSouth using one of three electronic interfaces: the Electronic Data Interchange ("EDI"), the Telecommunications Application Gateway ("TAG") or the Local Exchange Navigation System ("LENS"). Both EDI and TAG are based

on industry standards, while LENS is proprietary to BellSouth. Because the requests are sent to BellSouth in a Local Service Request ("LSR") format, which is different from the formats generated by RNS and ROS, BellSouth uses a suite of hardware and software systems and programs to convert the CLEC LSRs into formats that SOCS can recognize. The SOCS system that processes the CLEC service requests is exactly the same SOCS that processes a BellSouth service request, and it applies the very same SOER edit to CLEC service requests before either rejecting the request or allowing it to reach Assignable Order status.

The suite of hardware and software systems and programs that BellSouth has built between the CLECs and SOCS was designed by BellSouth from end-to-end and is not controlled by any industry standards, which relate only to communications between the EDI and TAG portions of the interface. Once a CLEC service request has been received and accepted by the EDI or TAG gateway, BellSouth first sends it to a Router that simply determines whether or not the service request includes Local Number Portability ("LNP"). Service requests including LNP are then routed to the LNP Gateway, while all others are routed sequentially to the Local Exchange Ordering ("LEO") and Local Exchange Service Order Generator ("LESOG") systems for editing and formatting. The LNP Gateway performs edits and

formatting for service requests that include LNP, and it also communicates the unique LNP elements of the request to the national LNP Service Management System ("SMS") which is external to BellSouth.

Once service requests are formatted by LEO/LESOG or the LNP Gateway they are forwarded to SOCS, but BellSouth has not programmed LEO/LESOG and the LNP Gateway to format all electronically submitted CLEC service requests into SOCS-readable requests. Instead, BellSouth designed these components to cause many orders to "fall out" of the electronic system, requiring manual processing. Additionally, LEO/LESOG, the LNP Gateway, and SOCS do not always perform as they should: they route a number of perfectly valid CLEC service requests to manual processing when they should not.

Thus, electronically submitted electronic service requests may receive manual processing 1) because BellSouth has not designed its system to process the request, which is known as designed Manual Fall Out or 2) because BellSouth's systems fail to perform as designed, which is known as BellSouth-Caused System Failure. Manual processing is undesirable because, as the FCC has repeatedly recognized, manual

processing limits reliability by increasing errors, increasing installation intervals, and increasing costs.

Q. IS IT POSSIBLE TO QUANTIFY THE IMPACT OF DESIGNED MANUAL FALL OUT AND BELLSOUTH-CAUSED SYSTEM FAILURES ON CLEC LOCAL SERVICE REQUESTS?

A. Yes, in January 2000, BellSouth began providing additional data concerning the level of Manual Fall Out and BellSouth-Caused System Failure experienced by CLEC service requests. This data is now available for each of the three interfaces (LENS, TAG and EDI) and by four groupings of products and services (Local Number Portability ('LNP"), UNEs, Business Resale, and Residence Resale). In Exhibit JMB-30, I have extracted from BellSouth's May 2000 through October 2000 Flow-Through Reports five key data points for each interface and product combination and calculated five measures of Manual Fall Out, System Failure, and Flow-Through Ordering.

As I explain below, BellSouth's data clearly shows that electronically submitted CLEC LSRs, particularly those for LNP, UNE or business products have low maximum flow-through rates, that the maximum flow-through rates for the products AT&T is ordering are even lower, and that both of these results are due to BellSouth's design decisions, and the failure of BellSouth's interfaces to perform as designed.

The data points and their definitions shown in Exhibit JMB-30 are as follows:

- Total Mechanized LSRs – the number of CLEC Local Service Requests submitted electronically.

- Manual Fall Out – the number of CLEC Local Service Requests submitted electronically that by BellSouth's design are routed for manual processing.

- Validated LSRs – the number of CLEC Local Service Requests submitted electronically which do not contain an CLEC auto clarification error[51] and for which BellSouth has designed automated processing.

- BellSouth-Caused System Failures – the number of CLEC Local Service Requests that were submitted electronically and became validated LSRs, but which BellSouth's systems failed to process, and were instead routed to manual handling.

- Flow-Through Issued Service Orders – the number of CLEC Local Service Requests submitted electronically that are forwarded to SOCS without BellSouth human intervention.

The measurements and their definitions are as follows:

- % Manual Fall Out – LSRs –The percentage of CLEC LSRs subjected to manual processing by BellSouth's design decisions, calculated by dividing Manual Fall Out by Total Mechanized LSRs.

- % BellSouth System Failure – LSRs –The percentage of CLEC LSRs subjected to manual processing because BellSouth's systems fail to perform as designed, calculated by dividing BellSouth-Caused System Failures by LSRs.

- % Total BellSouth Fall Out + Failure – LSRs – The total percentage of CLEC LSRs subjected to manual processing by BellSouth causes, calculated as the sum of the two previous measures.

- % Maximum Flow Through CLEC Orders – 100% - the % Total BellSouth Fall Out + Failure – LSRs. The maximum possible percentage of electronically submitted CLEC LSRs that would be Flow Through processed if CLECs make absolutely no input errors.

- % BellSouth System Failure – VLSR – The percentage of validated LSRs, which BellSouth's systems have been designed to process, that encounter unexpected failures, calculated by dividing BellSouth-Caused System Failures by Validated LSRs.

As discussed above, barring input error by its employees, BellSouth has Flow Through Ordering capability for 100% of the products and services it provides to its retail customers. The interfaces BellSouth provides to CLECs simply do not provide CLECs with the same capability. With the exception of residential resale service, only one-third to two-thirds of CLECs' error-free LSRs can be processed on a Flow Through basis.

I reviewed BellSouth's data For October 2000, and determined that CLECs' maximum possible Flow Through opportunity – even if they had submitted every service request with absolutely no input errors – was as low as 26%. For example, if CLECs had submitted 100 valid, error free orders for Local Number Portability ("LNP") over the TAG

[51] An auto clarification error is an input error made by an CLEC that BellSouth's systems

gateway in October of this year, only 26 of them would have flowed through to SOCs.

% Maximum Flow Through CLEC Orders October 2000				
Interface/ Product	**LNP**	**UNE**	**Business Resale**	**Residence Resale**
TAG	**26%**	**66%**	**47%**	**95%**
EDI	**38%**	**39%**	**27%**	**65%**
LENS	**NA**	**61%**	**53%**	**88%**

Only in the Residence Resale product grouping does any interface provide any acceptable level of Flow Through Ordering capability to CLECs. This is because the total percentage of CLEC LSRs subjected to manual processing by BellSouth causes (% Total BellSouth Fall Out + Failure – LSRs, shown in the table below), is unacceptably high for all interface/product combinations except TAG/Residence Resale:

% Total BellSouth Fall Out + Failure – LSRs October 2000

have been programmed to find and return automatically without human intervention.

Interface/ Product	LNP	UNE	Business Resale	Residence Resale
TAG	74%	34%	53%	5%
EDI	63%	61%	73%	35%
LENS	NA	39%	47%	12%

Each electronically submitted LSR represented by the percentages in these tables was touched by both the CLEC that originated the request and by BellSouth. BellSouth, and BellSouth alone, controls the two components (manual fallout and system failure) that generate the low maximum flow-through percentages shown in the table above.

The table below shows the incidence of manual fallout and system failure for various product lines across interfaces for October of this year. Curiously, the rate of system failure varies across interfaces:

Variance Manual Fall Out / System Failure – October 2000				
Interface/ Product	LNP	UNE	Business Resale	Residence Resale

TAG	**48% manual fallout/ 26% system failure**	**18% / 15%**	**42% / 11%**	**3% / 2%**
EDI	**26% / 37%**	**57% / 4%**	**66% / 7%**	**6% / 29%**
LENS	**NA**	**20% / 19%**	**25% / 23%**	**6% / 6%**

The variance in system failure rates between the interfaces when processing service requests for the same product grouping is difficult to understand. As shown in Exhibit JMB-29, the LEO/LESOG, LNP Gateway and SOCS systems in which these failures actually occur are common to all three TAG, EDI, and LENS interfaces, so one would expect the system failure rates to be the same or at least similar.

These system failure rates become even more significant when one considers that the failures occur on service requests that the systems were specifically designed to process. The table below (% BellSouth System Failure – VLSR) captures this situation. It shows the percentage of validated LSRs, which BellSouth's systems were designed to process, but which nevertheless encounter unexpected failures. In October the various interfaces performed as follows:

The % BellSouth System Failure – VLSR – October 2000				
Interface/ Product	**LNP**	**UNE**	**Business Resale**	**Residence Resale**
TAG	**53%**	**34%**	**29%**	**3%**
EDI	**53%**	**61%**	**25%**	**41%**
LENS	**NA**	**39%**	**36%**	**7%**

The table reveals that:

- The EDI interface failed to process 25% to 61% of the validated local service requests it was designed to process;
- The TAG interface failed to process 3% to 53% of the validated local service requests it was designed to process; and
- The LENS interface failed to perform as designed 7% to 39% of the time.

It is simply not credible to argue that such performance can be providing nondiscriminatory treatment to CLECs ordering services and elements from BellSouth in order to compete with BellSouth.

Q. IS THERE ANY EVIDENCE OF IMPROVEMENT IN THESE RESULTS OVER TIME?

A. No. In Exhibit JMB-31, I show the maximum possible flow through results from May through October for each of the four product groups (LNP, UNE, Business, Residence) and three ordering interfaces (EDI, TAG, LENS). There is no significant or consistent improvement trend. In fact, in September results for two combinations (TAG used for LNP and EDI used for UNE) are at all time lows. An accurate general statement would be that there is no apparent trend toward improvement and that in fact there appears to be degradation in some results since July (LNP-TAG, UNE-EDI, BUS-LENS, RES-EDI). I will provide updated data for Exhibits JMB-30 and JMB-31 with my rebuttal testimony and at the hearing reflecting all data current at that time.

Q. HOW DOES AT&T'S FLOW THROUGH EXPERIENCE COMPARE WITH THE CLEC AGGREGATE YOU HAVE PRESENTED?

A. I have performed additional analysis comparing flow through data for AT&T and the aggregated CLEC data shown above. The full results of my additional analysis is shown in Exhibit JMB-32. Based on this additional analysis, it is obvious that the flow through capabilities available to AT&T from BellSouth are inferior to those available to the CLECs as a whole.

On page one of Exhibit JMB-32 I have compared CLEC Aggregate and AT&T specific data concerning 1) Designed Manual Fallout, 2) BellSouth System Error, 3) Total Fallout Caused by BellSouth, and 4) the resulting Maximum Possible % Flow-Through for May through October. Maximum Possible % Flow-Through is determined by subtracting Total % Fallout Caused by BellSouth from 100%.

This table presents the Maximum Possible % Flow-Through results for AT&T's LNP, UNE and Business LSRs.[52]

Maximum Possible % Flow-Through Comparison

Product	**LPN**	**UNE**	**Business (Resale)**
Measure / Month	CLEC/ **AT&T**	CLEC/ **AT&T**	CLEC/ **AT&T**
Maximum Possible % Flow-Through			
• May	32% / **33%**	65% / **18%**	49& / **67%**
• June	37% / **19%**	68% / **20%**	53% / **70%**
• July	37% / **19%**	65% / **18%**	53% / **41%**
• August	37% / **16%**	66% / **11%**	52% / **11%**
• September	34% / **26%**	62% / **8%**	50% / **55%**
• October	36% / **26%**	65% / **13%**	49% / **70%**

It is obvious from this data that the flow through capabilities available to AT&T from BellSouth are inferior to those available to the CLECs as a whole.

Because AT&T uses only the EDI interface to place LSR's, I carried my analysis one step further and compared only data associated with EDI transactions. Here I used official flow-through data as reported by BellSouth. BellSouth calls this result its "CLEC Error Excluded Flow-through", in my analysis I label this result "System Potential Flow-Through" or "Potential EDI" on pages 2-9[53]. This table compares Aggregate CLEC EDI results to AT&T EDI results.

Product	LPN		UNE		Business (Resale)	
Measure/ Interface	CLEC	AT&T	CLEC	AT&T	CLEC	AT&T
Potential EDI						
May	45%	**0%**	38%	**8%**	54%	**57%**
June	51%	**0%**	58%	**13%**	64%	**100%**
July	53%	**0%**	58%	**3.4%**	51%	**100%**
August	45%	**0%**	89%	**29%**	53%	**0%**
September	40%	**0%**	26%	**19%**	66%	**43%**
October	46%	**67%**	87%	**40%**	69%	**60%**

Again, it is obvious that the capabilities available to AT&T from BellSouth are inferior to those available to the CLECs as a whole.[54] What is not so readily obvious is why. The reason is because AT&T's

[52] AT&T does not actually order any Resale Business services. The LSRs BellSouth reports in this category are directory listing orders associated with UNE services.
[53] In the Exhibit (JMB-32) I produce data for three calculations, Basic, Achieved, and Potential as described on page 2. Here I use only the Potential data.
[54] It would appear that AT&T's results for Business are better than the CLEC results, but this is a false depiction for two reasons, 1) AT&T's "business" orders are directory listings only and 2) the flawed understanding of the meaning of the "Potential" measurement.

orders are being subjected to higher rates of Designed Manual Fallout and BellSouth System Errors.

- AT&T's LNP orders encountered Designed Manual Fallout of 67%, 74%, 81%, 84%, 74%, and 74% respectively, during the months May through October.

- AT&T's UNE orders encountered Designed Manual Fallout of 62%, 60%, 49%, 81%, 76%, and 80% as well as BellSouth System Error rates of 20%, 20%, 33%, 8%, 16%, and 7%.

- AT&T's "Business" orders encountered Designed Manual Fallout of 0%, 30%, 59%, 83%, 9%, and 15% as well as BellSouth System Errors of 33%, 0%, 0%, 8%, 36%, and 15%.[55]

BellSouth's system design and operational performance discriminates against CLECs using LNP and UNE products as the basis of their market entry. I will provide updated data for Exhibit JMB-32 at the hearing.

Q. WHAT HAPPENS TO AN AT&T OR OTHER CLEC'S LSR WHEN IT ENCOUNTERS EITHER DESIGNED MANUAL FALLOUT OR BELLSOUTH SYSTEM ERROR?

A. BellSouth routes the LSR to the Local Carrier Service Center ("LCSC") for manual processing. This causes delay and increases the probability of input and provisioning error.

[55] Regardless of any other conditions, whenever there are any number of issued service orders, and a zero (0) percent of BellSouth System Errors, BellSouth's flawed calculation will produce a 100% result.

Q. HAVE YOU QUANTIFIED THE DELAY THAT RESULTS FROM MANUAL PROCESSING?

A. Yes, and it is unreasonable, as explained below. While it is not possible with available data to quantify the additional error rate, any increase in errors is both undesirable and unreasonable.

BellSouth has long claimed that electronic orders that encounter either Designed Manual Fallout and or BellSouth System Errors are immediately routed to the LCSC for handling and that errors receive some sort of priority handling. In March of this year BellSouth began producing a report that clearly indicates this does not happen. This new report is known as the CLEC LSR Report. Exhibit JMB-33 provides an illustrative copy of this report for one of AT&T's Operating Company Numbers ("OCN").

This new report makes it possible to determine the duration between the time an LSR falls out for manual processing (as a result of either a Designed Manual Fallout or a BellSouth System Error) and the time an LCSC representative "claims" that LSR to begin working on it. The following table provides the average "Claim Interval" for AT&T's LSRs in May and June.

OCN	Average Claim Interval	
	May	June

7125	40 hours	40 hours
7421	29 hours	36 hours
7680	30 hours	30 hours

I recently calculated these same intervals for the months of September and October and have summarized that data in the following table.

OCN	Average Claim Interval	
	September	**October**
7125	34 hours	59 hours
7421	32 hours	130 hours
7680	67 hours	74 hours

The increase in this interval from earlier in the year, particularly during the month of October, is unreasonable. Clearly, it is unreasonable to place an electronically submitted LSR into a holding pattern for 59 to 130 hours[56]. While such orders are waiting to be processed, other orders actually are being processed and may use resources that should have been assigned to the delayed order. Delays of this length will often result in the issuance of an order with a change in installation due date, which may not be acceptable to the customer. Other time-dependent factors associated with the order also are likely to change. Ultimately, many orders delayed in this manner will have to be cancelled or supplemented.

[56] The earlier 29 to 40 hour interval is also unreasonable.

Q. DID AT&T ATTEMPT TO DETERMINE FROM BELLSOUTH WHY THESE INTERVALS INCREASED SO MUCH IN OCTOBER?

A. Yes. AT&T noticed that many of its orders were not being processed in a timely fashion, and questioned BellSouth. On November 3, 2000, BellSouth responded to an AT&T October 20, 2000 e-mail, stating that there had been "a directory listings problem in our LEO systems," that "order volume had overwhelmed the center," and that 20 service representatives would be added to the staff on November 13th and 20 more in December. Exhibit JMB-34. I will continue to calculate this interval and provide current data in my rebuttal testimony and at hearing. Clearly BellSouth's failure to provide flow-thorough ordering jeopardizes CLECs' ability to compete effectively.

Q. PLEASE SUMMARIZE YOUR TESTIMONY CONCERNING THE NEED FOR FULL ELECTRONIC ORDERING WITH FLOW THROUGH CAPABILITY.

A. BellSouth's current ordering interfaces do not provide AT&T and other CLEC's with Flow-Through Ordering capabilities equal to that enjoyed by BellSouth in its retail operations. Although BellSouth has Flow-Through Ordering for all of its services, it does not provide the ability to submit local service requests electronically for all of the services and elements that AT&T wishes to purchase. Additionally, even when

BellSouth makes available the ability to electronically submit a request, often it does not provide the automated capability to process the order on its side of the interface. Further, even when both the ability to submit requests electronically and an automated capability has been designed, the process often fails to perform as designed. These failures on BellSouth's part are particularly evident in the Business, UNE and LNP product groupings. Finally, BellSouth is unable to staff its LCSC in a manner that provides timely handling of the many orders that fallout of the electronic process. Thus, BellSouth not only provides discriminatory treatment of all CLEC transactions, but it also sets up additional levels of discrimination between resale, UNE and facilities-based CLECs.

In order to eliminate this discrimination, AT&T asks this Authority to order BellSouth to provide both electronic LSR submission capability and a fully automated process for handling electronically submitted requests for all of the services and elements available to CLECs equal to that which exists for BellSouth's retail operations. BellSouth should be ordered to provide these capabilities within 12 months of the TRA's order.

ISSUE 19

THE MAINTENANCE AND REPAIR ACCESS ISSUE

Q. WHAT INTERFACES DOES BELLSOUTH OFFER TO AT&T FOR ACCESS TO MAINTENANCE AND REPAIR FUNCTIONS?

A. BellSouth provides two options for electronic trouble reporting. For many (but not all) services associated with a telephone number, BellSouth offers access to its proprietary Trouble Analysis Facilitation Interface ("TAFI"). For both telephone number-associated exchange services and individually designed services, BellSouth provides electronic trouble reporting through an electronic communications gateway which BellSouth calls the Electronic Communication Trouble Administration ("ECTA") gateway. This interface also is referred to as the Electronic Bonding Interface ("EBI"), particularly in AT&T internal communications.

Q. DO EITHER ECTA OR TAFI PROVIDE AT&T WITH NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OSS FOR MAINTENANCE AND REPAIR FUNCTIONS?

A. No. For services associated with a telephone number, TAFI has more extensive functionality than ECTA, but TAFI is a human-to-machine interface. Consequently, when an CLEC submits a trouble report via TAFI, that order must be manually entered into the CLEC's own internal OSS. ECTA, on the other hand, is a machine-to-machine interface and can be integrated with an CLEC's own OSS, but it does

not have the functionality of TAFI. Thus, there is no combination of choices that provides CLECs with nondiscriminatory access to BellSouth's OSS for maintenance and repair functions. TAFI provides extensive functionality for many services associated with a telephone number, but provides no functionality for other services, and also requires costly and error-prone double entry. While ECTA can be integrated into CLEC systems, it provides only a limited set of functionality for any type of service. Obtaining and operating both interfaces simply brings the CLEC the disadvantages of both with no gain in effectiveness or efficiency and at a higher cost of operations. These choices are inconsistent with the requirements of the Act and the needs of competitors.

Q. BELLSOUTH USES TAFI IN ITS RETAIL OPERATIONS. DOESN'T ALLOWING CLECS ACCESS TO TAFI PROVIDE THEM WITH THE SAME FUNCTIONALITY THAT BELLSOUTH ENJOYS?

A. No. CLECs cannot integrate TAFI with their own "back office" systems as BellSouth does. When a BellSouth customer service representative creates a trouble ticket using TAFI, the system creates a record of the transaction that can be accessed and viewed from BellSouth's internal systems. An CLEC customer service representative, on the other hand, must perform this process twice in

order to create an internal record of any trouble transaction: once in TAFI and again within the CLEC's own system.

BellSouth itself noted its superior ability to utilize TAFI functions in its second Louisiana 271 application before the FCC. The FCC took significant notice of BellSouth's concession:

> "We also note that BellSouth concedes that it derives superior integration capabilities from TAFI than the capabilities offered to competitors. BellSouth states that TAFI is a 'human to machine interface' meaning that new entrants using TAFI cannot integrate it with the new entrant's own back office systems....BellSouth, on the other hand, is able to take advantage of its own TAFI system's capability of 'automatically interacting with other systems as appropriate' and its customer service representatives need not duplicate their efforts in the same way. In other words, TAFI is integrated with BellSouth's other back office systems."[57]

Q. WHY IS A FULL FUNCTION MACHINE-TO-MACHINE MAINTENANCE AND REPAIR INTERFACE NECESSARY?

A. If CLECs hope to compete with BellSouth, they must provide equal or better customer service and lower prices. CLECs must be able to efficiently access all of an individual customer's data on every call in order to address that customer's needs. Therefore CLECs must be able to access their own data as well as ILEC data. For example, if a CLEC wants to issue credits to a customer who had experienced

[57] FCC Second Louisiana Order, ¶ 151, emphasis added.

recurring repairs, it would need access to billing data and maintenance histories. If the CLEC needed to determine whether a customer was being billed for specific services, it would need access to information about which services were billed and which services were provided, and also would need the ability to change the services being provided if they did not match the services billed to that customer. CLECs must be able to add or change services and adjust calling plans for customers, and require access to customer service record information to keep contact information up-to-date.

A full-function, machine-to-machine interface is essential in a competitive market. With a successful market entry, maintenance and repair volumes will increase quickly. Approximately 4% of lines will need repair treatment monthly. Customer contacts to service existing lines can be expected to occur on 6% of lines each month. Within 30 months of a successful consumer market entry, an CLEC can expect one third of its total customer contacts to be for repair and maintenance.

AT&T's repair call volume 30 months after a successful market entry across the BellSouth states easily could approach 60,000 calls per month. Without a full function machine-to-machine interface, an CLEC must engage in dual entry of its repair contacts, entering the

contact into BellSouth's system as well as its own. Dual entry must occur while the customer is on-line for the CLEC to provide efficient customer service. Dual entry is more time consuming and results in more mistakes, requiring more service representatives. Additionally the lack of a full function machine-to-machine interface deprives the CLEC of performance information essential to the management of its service representatives. Use of an interface like TAFI that requires dual entry and is not integrated with the CLEC's own OSS means that the CLEC will not have real time access to call volume and connect time data required for efficient staffing.

Q. HAS AT&T EVER REQUESTED THAT BELLSOUTH PROVIDE FULL TAFI FUNCTIONALITY OVER THE ECTA INFERFACE?

A. Yes. Since April 1996, AT&T consistently has requested BellSouth to provide access to TAFI functionality through a machine-to-machine interface like ECTA. Exhibit JMB-35JMB-35 is a copy of AT&T's Ex Parte letter to the FCC following a meeting on December 23, 1998, with members of the Common Carrier Bureau Staff, and representatives from MCI, BellSouth, and AT&T (hereinafter "AT&T 12/23/98 Ex Parte"). AT&T's initial request to BellSouth is at Tab C-4 of Exhibit JMB-35. Exhibit JMB-36 visually depicts AT&T requested arrangement.

Initially, BellSouth agreed to AT&T's request. In its preliminary report to the Georgia PSC on OSS interfaces dated June 21, 1996, (page 15), BellSouth stated that it "has investigated the possibility of adding to the existing [EBI] gateway a system called . . . TAFI." Exhibit JMB-35, Tab C-6. In response to BellSouth's preliminary report, the Georgia PSC ordered BellSouth to complete "the TAFI enhancements to allow full operation of the required access by March 31, 1997."[58] Exhibit JMB-35, Tab C-7. Despite the Georgia PSC's order, BellSouth has never provided those enhancements.

AT&T has pursued its request at every opportunity available to it since April of 1996. The chronology at Exhibit JMB-35, Tab C-1 reflects those efforts through April 3, 1998. Even though BellSouth's representatives have agreed on numerous occasions that providing TAFI functionality over the ECTA interface is possible and a goal worth pursing (see Exhibit JMB-35, Tab C-14 for the testimony and transcript of William N. Stacy before the Georgia PSC in March 1998) no development activity ever occurred.

The December 23, 1998, meeting which gave rise to the materials in Exhibit JMB-35, was requested by the FCC Staff after the publication of the Second Louisiana Order to increase its understanding of the need for integrateable machine-to-machine interfaces for repair and

[58] Georgia PSC Order, Docket No. 6352-U (July 2, 1996).

maintenance. The FCC Staff's written request for a meeting posed specific questions. AT&T's answers and supporting diagrams may be found in Exhibit JMB-35, Tab A and Tab B. During the course of this meeting, BellSouth's representative, Mr. William N. Stacy, stated that BellSouth could provide initial functionality in 13 months and complete functionality in 18 months. Two years after this meeting, however, BellSouth still offers no TAFI functionality via the ECTA interface.

Most recently, AT&T submitted a formal change request through the Interim Change Control Process on April 18, 2000, asking for TAFI functionality via the ECTA interface. AT&T does not believe that its recent formal request was required, however, because of BellSouth's long standing and pre-existing knowledge of the issue.

Q. DOES PROVIDING ADDITIONAL FUNCTIONALITY (TAFI) OVER A STANDARDS-BASED INTERFACE (ECTA) VIOLATE THE STANDARD?

A. No. Industry standards are guidelines - providing functionality over and above the guideline does not violate standards. In fact, doing so is one of the key methods by which the guidelines are expanded and improved. A number of parties using an interface based on industry standards modify the interface to provide more functionality or operate

more efficiently and then submit their work and the evidence of its value to the industry for consideration as an improvement to the standard. In fact, AT&T and BellSouth have presented such joint modifications of industry standards to the industry in the past.

Further, it is important to remember that although the use of industry standards can meet the needs of a competitive local exchange market[59], lack of industry standards does not excuse an incumbent LEC from meeting its obligation to provide nondiscriminatory access to OSS functions.[60] Similarly, deploying an interface that merely adheres to industry standards is not sufficient to demonstrate nondiscriminatory access. A BOC must provide nondiscriminatory access to its OSS functions irrespective of the existence of, or whether it complies with, industry standards.[61]

Q. HAS BELLSOUTH TAKEN ANY ACTION TOWARD ADDRESSING AT&T'S CHANGE REQUEST?

A. No. However, BellSouth announced a number of what it called "Updates to Maintenance Interfaces" to the CLEC community during the October 25, 2000 Change Control Process Monthly Status Meeting. During this meeting Mr. Gene Piatkowski discussed "DLEC

[59] FCC Ameritech Order ¶ 217; FCC BA-NY Order ¶ 88
[60] FCC South Carolina Order ¶ 121, n. 362.

TAFI", "CPSS-TS", and "E Repair". No written materials were provided to support Mr. Piatkowski's presentation.

Q. CAN YOU BRIEFLY SUMMARIZE THE PRESENTATION?

A. Yes. The functionality in DLEC TAFI was originally developed to support BellSouth's use of its retail ADSL product line. BellSouth now plans to make it available to CLECs and DLECs to support repair and maintenance of XDSL and line sharing for high-speed data. The retail version has apparently been internally available to BellSouth for some time but is only now being demonstrated to A/DLECs. The CLEC TAFI User Guide issued in September 2000 contains a description of DLEC TAFI in Chapter 14.

CPSS-TA (Circuit Provisioned Special Services – Trouble Analysis) is a graphical user interface (GUI) that can be used to enter designed service troubles into Work Force Administration (WFA). BellSouth apparently developed the interface based on interest from small IXCs and will now offer it to CLECs as well. It was stated that CPSS-TA would be piloted with IXCs. No firm date for production availability was provided.

E-Repair apparently is being designed initially to allow BellSouth's large retail business customers to view the status of trouble reports

[61] FCC Louisiana II Order ¶ 137.

filed on their services. Development apparently is well along, and a pilot with large retail business customers is expected to begin in January 2001. CLECs also will be able to use this initial capability to view the status of their previously entered trouble reports (currently they must call BellSouth for status information). Mr. Piatkowski reports that E-Repair is being designed for a much broader future scope, to be implemented in stages. Phase I will provide the status-only use described above. Phase II will eventually add entry and viewing of all non-designed and designed service troubles. BellSouth stated there would likely be a migration from TAFI and CPSS-TA to E-Repair.

Q. ARE THESE ANNOUNCEMENTS SIGNIFICANT?

A. Although AT&T hopes that the future capabilities discussed in these announcements will become useful and meaningful improvements in the maintenance and repair functionalities available to CLECs, it is both surprising and disappointing that BellSouth elected to pursue these projects without discussing them with the CLEC community that will use them. As I explained above, AT&T has a long-standing request for a full-function maintenance and repair interface, and has been negotiating in good faith with BellSouth regarding this issue for over a year, yet BellSouth failed to raise these projects as a possible solution.

Incidentally, BellSouth has failed to comply with the requirements of its Change Control Process in announcing these interfaces. No written description of the interfaces discussed was provided to the Bellsouth Change Control Manager for distribution to the CLECs in advance of the monthly status meeting and the agenda indicated under the Open Discussion section "Updates to Maintenance Interfaces" rather than a presentation on new interfaces. Thus it was impossible for the CLECs to participate in the discussion intelligently. Further subsequent to the meeting, BellSouth has not provided any specifications associated with the new interfaces for CLEC review. An informal announcement to the Change Control Participants is not sufficient to accomplish even the limited objectives BellSouth recognizes in its language "to identify interest in the new interface and obtain input from the CLEC community" (Exhibit JMB-12, page 48), let alone meet the CLECs business needs for the timely distribution of information and specifications.

Q. IF BELLSOUTH COMPLETES THE "DLEC TAFI", "CPSS-TS", and "E Repair" PROJECTS, WILL IT HAVE FULFILLED AT&T'S REQUEST FOR A FULL-FUNCTION INTEGRATEABLE MAINTENANCE AND REPAIR INTERFACE?

A. Without the information identified above that BellSouth has not provided, it is hard to make any firm determination. However based upon the oral presentation it seems clear that DLEC TAFI and CPSS-TA will be human to machine interfaces and that if E-Repair is to evolve to a full function integratable interface, it will not do so in the near future (before 2002). Thus, the FCC's 1998 evaluation of BellSouth's maintenance and repair interfaces is still relevant today.

Q. WHAT DID THE FCC CONCLUDE REGARDING BELLSOUTH'S MAINTENANCE AND REPAIR INTERFACES?

A. The FCC examined TAFI and ECTA in BellSouth's last 271 application, and concluded that neither provides competitors with OSS functionalities equivalent to BellSouth's own capabilities.[62]

Regarding TAFI, the FCC concluded that TAFI does not provide nondiscriminatory access because it cannot be used for all types of orders and because TAFI is a "human to machine interface," meaning that new entrants cannot integrate it with the new entrant's own back office systems.[63] The lack of integration the FCC describes requires a TAFI user to take information from the TAFI system and manually re-enter it into their own computer systems and vice versa.[64]

[62] FCC Louisiana II Order ¶ 148.
[63] FCC Louisiana II Order ¶¶ 149-52.

Regarding ECTA, the FCC concluded that ECTA as provided by BellSouth does not provide parity to competitors because, as BellSouth itself pointed out, the legacy system TAFI is superior in functionality.[65]

Q. HAS BELLSOUTH IMPROVED THE FUNCTIONALITY OF TAFI AND ECTA IN RESPONSE TO THE FCC'S FINDINGS?

A. No. The FCC's findings are still relevant and valid today.

Q. SINCE THE SECOND LOUISIANA ORDER HAS THE FCC ADOPTED A NEW POSITION REGARDING THE NEED FOR MACHINE-TO-MACHINE INTERFACES FOR MAINTENANCE AND REPAIR?

A. No. In February 1999, the FCC Staff addressed the issue in a letter to BellSouth (Exhibit JMB-37, Page 2), restating the findings of the FCC in the Louisiana II Order that, "We do not here conclude that TAFI's lack of integration *per se* fails to constitute nondiscriminatory access, although we do believe BellSouth would provide a more complete opportunity to compete if it offered competitive LECs an integrated system with the same functionalities available to BellSouth's own service representatives."[66] Additionally, the Staff provided a list of information that BellSouth would be required to submit with its next

[64] FCC Louisiana II Order ¶152.
[65] FCC Louisiana II Order ¶ 157.

application if it were to attempt to demonstrate that it was providing nondiscriminatory maintenance and repair without a machine-to-machine interface. BellSouth has not attempted to make such a demonstration in this arbitration. The Staff further indicated that it would seek additional information to assess the competitive impact resulting from the lack of a machine-to-machine interface. AT&T participated in such an information-gathering meeting with the Staff on February 17, 1999. Exhibit JMB-38 is AT&T's Ex Parte letter associated with that meeting and includes the handouts from AT&T's presentation.

Until such time as BellSouth presents its next 271 Application to the FCC, the findings of the Louisiana II Order accurately describe the discriminatory nature of the maintenance and repair interfaces BellSouth is offering to AT&T. This Authority should order to BellSouth to provide full TAFI functionality via the ECTA interface on an expedited schedule.

Q. WHAT DOES AT&T REQUEST THAT THE TRA ORDER REGARDING THIS ISSUE?

A. AT&T asks the TRA to order BellSouth to provide full TAFI functionality via the ECTA interface, or a another integratable

[66] FCC Louisiana II Order ¶ 152.

machine-to-machine interface on an expedited schedule within 12 months of its Order.

SUMMARY

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. BellSouth must provide nondiscriminatory access to its OSS in order to comply with Section 251 of the Act and the implementing rules of the FCC. In addition to computer-based systems and databases, nondiscriminatory access to OSS includes any manual processes required in conjunction with or in the absence of such systems and capabilities.

BellSouth has not offered a resolution to the Footprint-OS/DA Issue, the Equivalent Functionalities Issue or the Maintenance and Repair Access Issue that would provide AT&T with the same functionalities that BellSouth provides itself through its various OSS. BellSouth thus has been unwilling to provide AT&T with nondiscriminatory access. Likewise, BellSouth's offered Electronic Interface Change Control Process and proposed Interim Change Control Process are insufficient under the Act and current FCC guidance. BellSouth does not provide customized routing through a commercially viable, timely, repeatable process and thus is not entitled to charge for OS/DA using market-based rates.

BellSouth's ordering/provisioning interfaces do not provide AT&T with sufficient functionality. AT&T cannot submit flow-through electronic orders for the arrangements necessary to route a specific customer's operator services or directory assistance calls to either BellSouth's service platform on an unbranded basis or to another service platform of AT&T's choosing.

BellSouth fails to provide a key pre-ordering element, the Customer's Service Record electronically in a parsed manner suitable for automated integration into AT&T's OSS, which would allow for automated error-free population of many required fields of a Local Service Request.

AT&T cannot electronically order the same range of retail services as BellSouth and can electronically order only a handful of network elements. Further, for a significant portion of electronically submitted orders, BellSouth subsequently performs manual processing of AT&T's orders that is not required to process BellSouth's orders for the same services and elements. BellSouth's excessive reliance upon manual ordering and provisioning processes significantly disadvantages AT&T in its attempt to enter the local market using either network elements or its own facilities.

BellSouth's maintenance and repair interfaces (EBI/ECTA and TAFI) do not provide AT&T with nondiscriminatory access. EBI/ECTA is a machine-to-machine interface that lacks the requisite functionality. TAFI, on the other hand, has adequate functionality but is a human-to-machine interface. AT&T has requested that BellSouth provide access to TAFI functionality through EBI/ECTA, which should provide better access to BellSouth's OSS for maintenance and repair functions. BellSouth has agreed that such access is technically feasible but has not committed to an implementation date.

Finally, the TRA should order BellSouth to provide a comprehensive Change Control Process, with "cradle to grave" coverage of the life cycle of an interface or process (electronic or manual) and its supporting documentation (such as specifications, business rules, methods, and procedures). The evolving CCP is lacking in coverage of many critical areas.

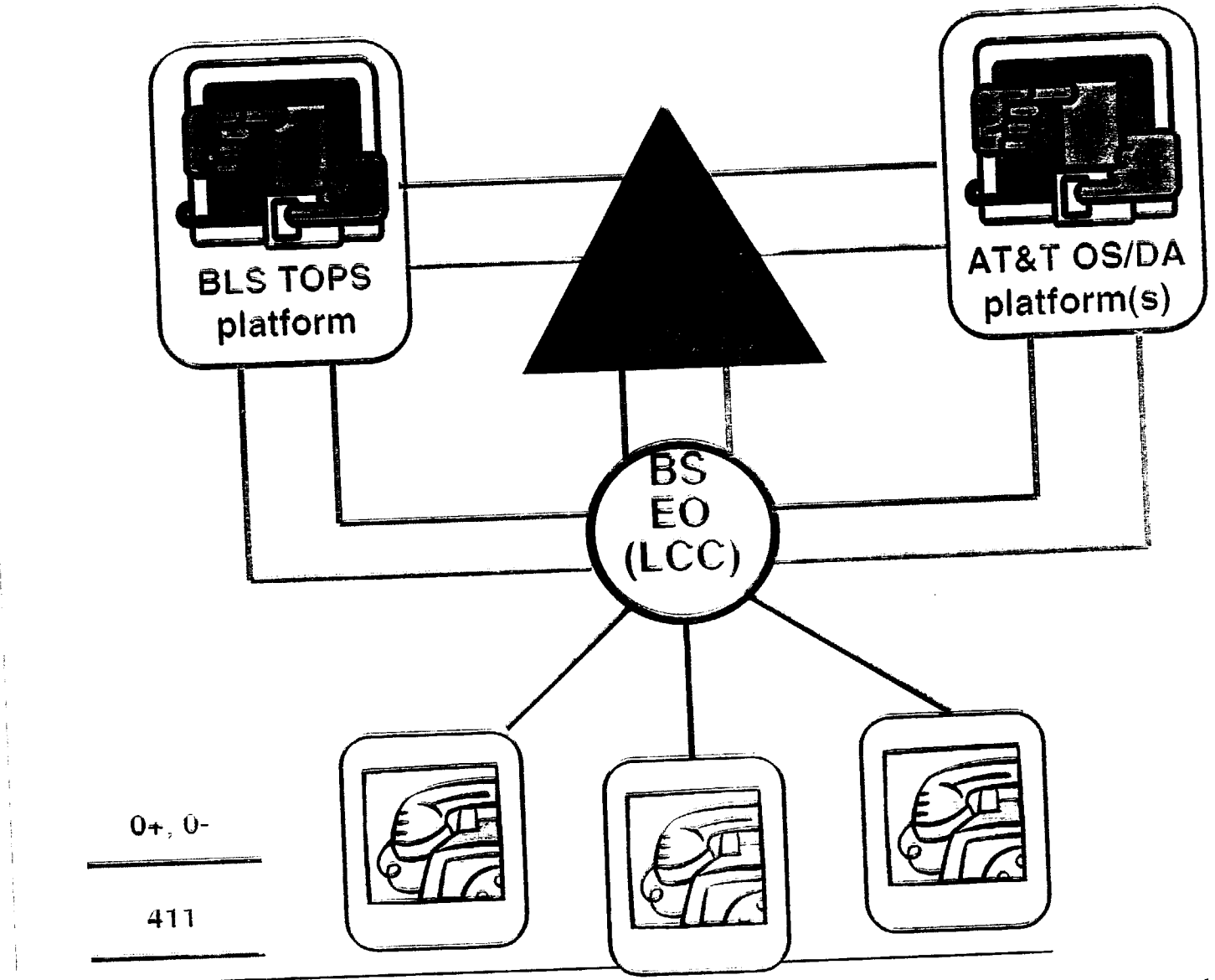
For these reasons and the reasons explained above, I recommend this Authority find that BellSouth's OSS interfaces offered through negotiation do not comply with the provisions of Section 251 of the Act and recommend that this Authority adopt AT&T's proposed

Interconnection Agreement language for issues 14, 15, 17, 18, and 19.

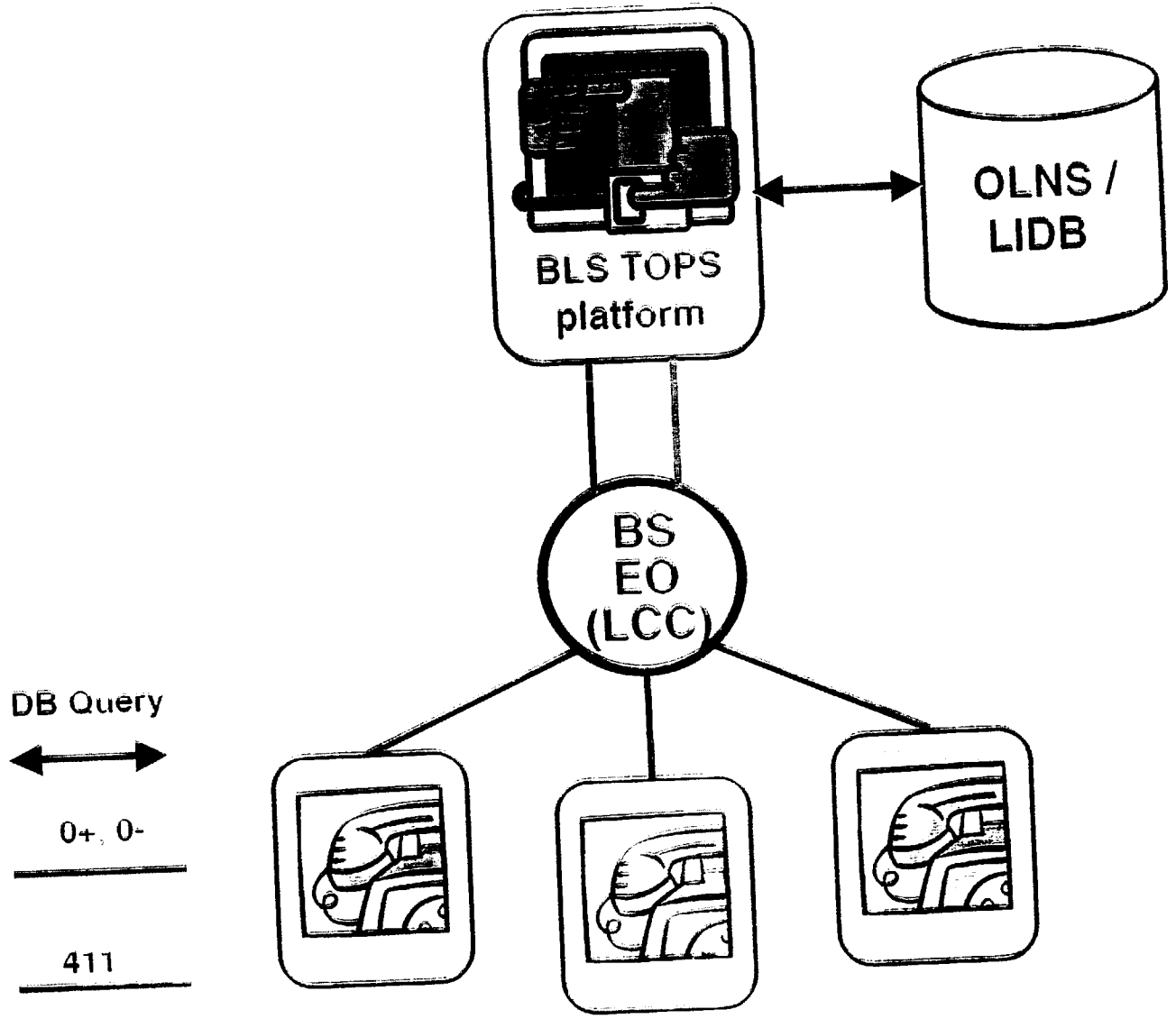
Q. DOES THAT COMPLETE YOUR TESTIMONY AT THIS TIME?

A. Yes.

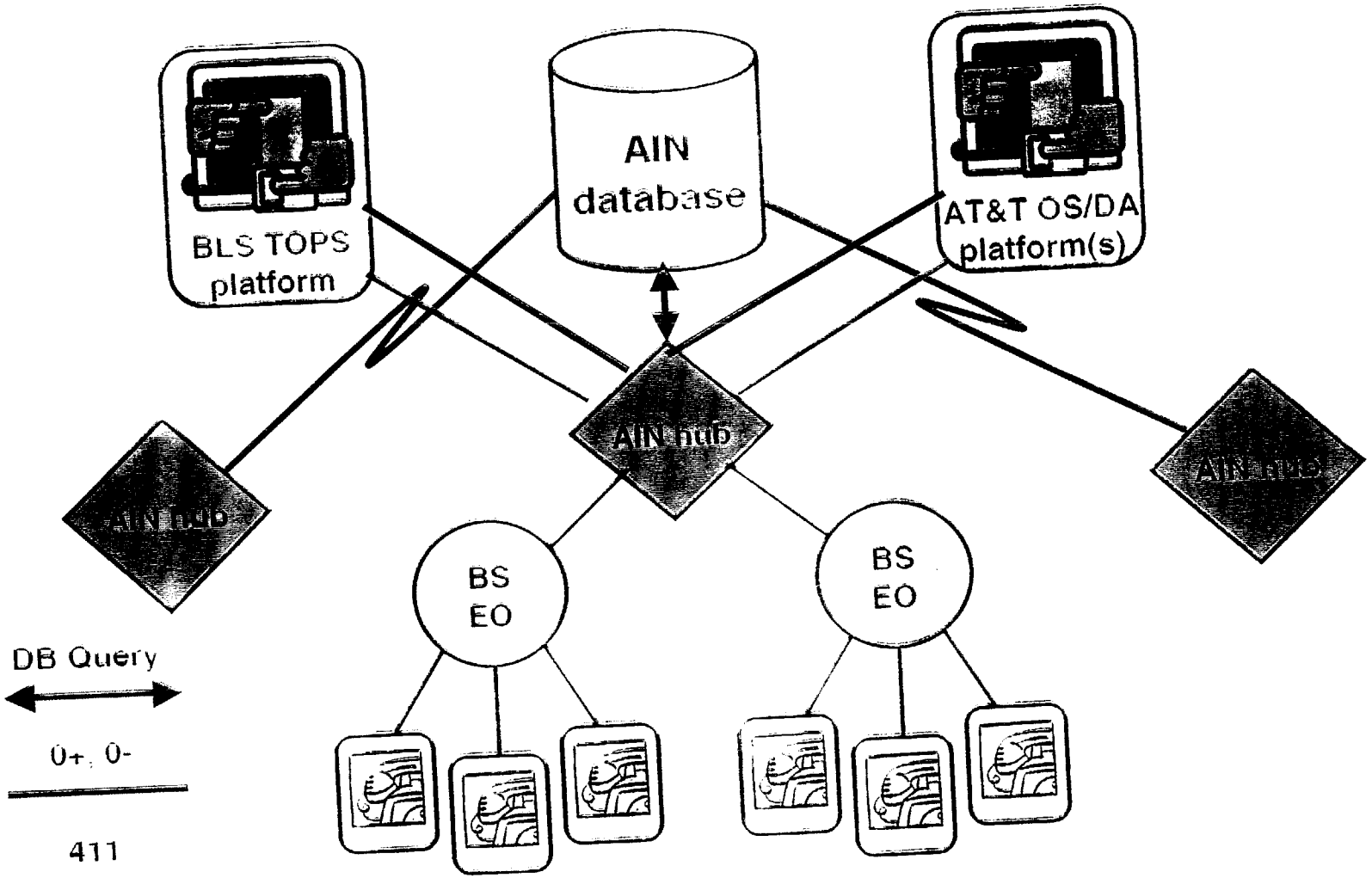
BellSouth line class code method



BellSouth OLNS method



BellSouth AIN hubbing method



OS/DA ordering

TWO-PART PROCESS

1. **FOOTPRINT ORDER**

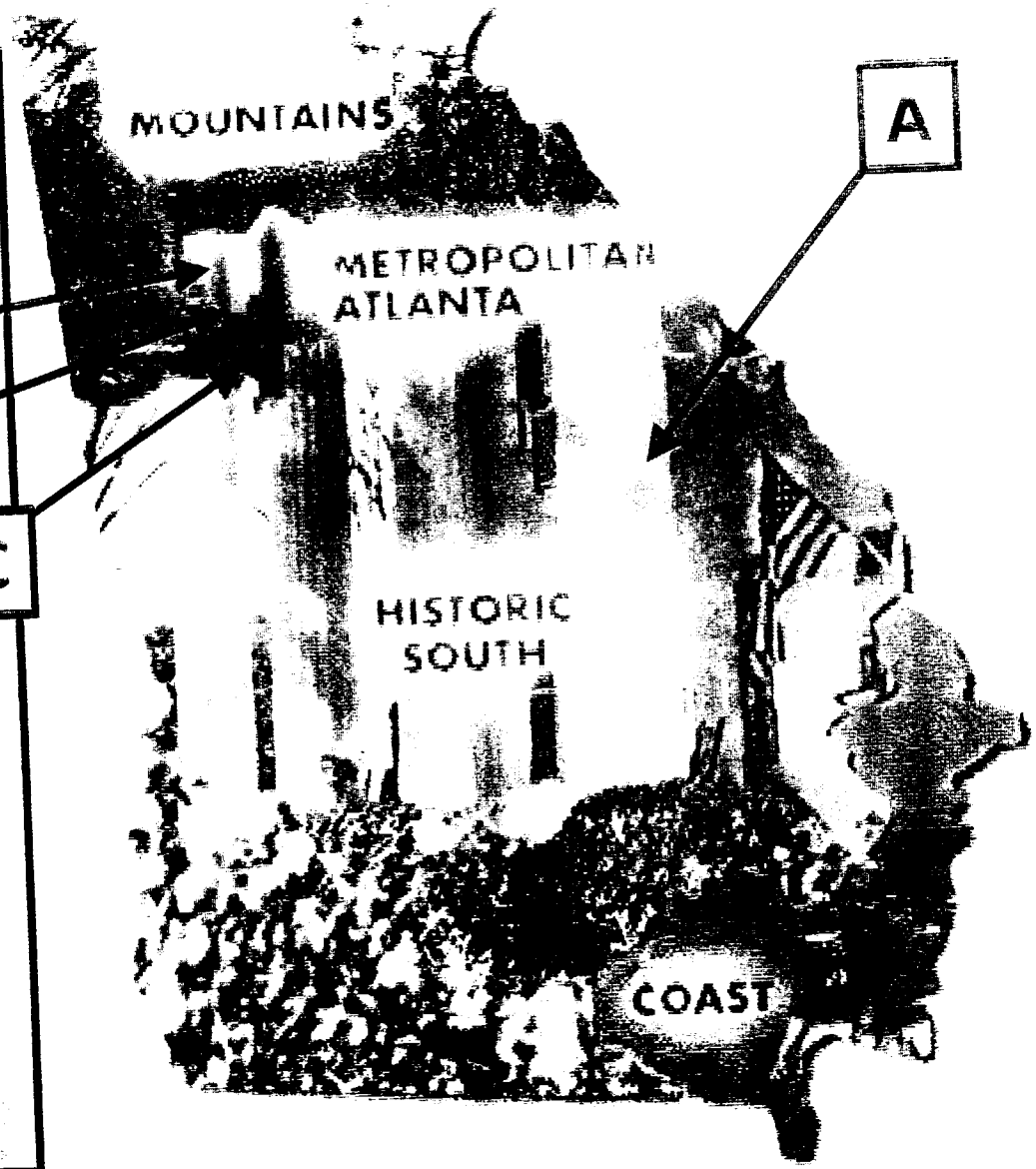
   Establish and implement

   Trunking and routing
   - A. CLEC branded
   - B. Un-branded
   - C. Other platform

   Geographic grouping

2. **CUSTOMER SPECIFIC ORDERS**

   Local Service Request (LSR)
   - Identify desired arrangement



-----Original Message-----
From: Michael.Willis1@bridge bellsouth.com
[mailto:Michael.Willis1@bridge.bellsouth.com]
Sent: Thursday, October 26, 2000 3:17 PM
To: Byrd, Dawn B (Bone), NCAM; Peacock, Billy C (Bill), NCAM
Subject: Revised LCC with Alternate Provider Language
Importance: High

Bill and Dawn: Attached is the revised LCC provisions with language re: use of an Alternate Provider We are still waiting on a response on the electronic ordering procedures.

Thanks,

Michael

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).

3.20.3 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 4 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 20.5 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 6 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.

3.20.7 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 8 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 20.9 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 20.10 The rates for Line Class Codes are set forth in Exhibit C 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.

3.20.11 Electronic ordering of Line Class Codes will be negotiated between the parties once the Line Class Codes are established.

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

ATLANTA, GEORGIA

In the Matter of:	)	
	)	
BellSouth Telecommunications, Inc.'s	)	
Entry into InterLATA Services Pursuant	)	Docket No. 6863-U
To Section 271 of the Telecommunications	)	
Act of 1996.	)	
BellSouth Telecommunications, Inc.'s	)	
Statement of Generally Available Terms	)	Docket No. 7253-U
and Conditions under Section 252(f) of	)	
the Telecommunications Act of 1996.	)	

AFFIDAVIT OF W. KEITH MILNER

NOVEMBER 21, 2000

W. Keith Milner, being duly sworn, deposes and says:

TRA Docket No. 00-00079
JMB-4
Page 1 of 21

1. 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 Telecommunications, Inc. ("BellSouth"). The purpose of this affidavit is to provide the Commission with the most current information concerning unbundled network elements, interconnection services, and resold services furnished by BellSouth.

Checklist Item No. 1 (Interconnection)

2. As of September 30, 2000, BellSouth had provisioned 92,409 trunks interconnecting BellSouth's network and 28 facility-based CLECs' networks in Georgia, (that is, trunks between CLECs' switches and BellSouth's switches) including AT&T, MFS, MCImetro, MediaOne, and US LEC. In its nine-state region, BellSouth had installed 351,380 interconnection trunks from CLECs' switches to BellSouth's switches as of September 30, 2000.

Checklist Item No. 2 (Unbundled Network Elements)

3. In 1998, BellSouth received 181 physical and 73 virtual collocation requests in Georgia. In 1999, BellSouth received 455 physical and 96 virtual collocation requests in Georgia. In 2000, year-to-date as of September 30, BellSouth received 697 physical and 41 virtual collocation requests. In Georgia, collocation growth has been concentrated in the metro Atlanta exchanges. As of September 30, 2000, 26% of all physical collocation arrangements in Georgia were in the Atlanta exchange and 52% were in the Metro Atlanta exchanges. Similarly, for the same time period, 34% of all virtual collocation arrangements in Georgia were in the Atlanta exchange and 45% were in the Metro Atlanta exchanges.

4. The tremendous growth in the number of collocation requests and the concentrated nature of such requests has, in the past, caused some delays in

the provisioning of physical collocation. To address this issue, BellSouth has taken steps to better manage the process in light of the growth in demand. A new group called the Centralized Collocation District (CCD) was established in January 2000 to off-load certain functions from various line organizations so that the line organizations can focus more on meeting the specific needs of BellSouth's collocation customers. The primary purpose of the CCD is to reduce the cycle time on collocation requests. A program management group has been assigned within the CCD to track and ensure that all collocation requests are processed in a timely fashion.

5. In Georgia, BellSouth had completed 526 physical collocation arrangements, and 158 additional physical collocation arrangements are in progress as of September 30, 2000. CLECs requesting physical collocation in Georgia include AT&T, MCImetro, MFS, COVAD, Mpower, and NEXTLINK.

6. BellSouth also is providing virtual collocation to CLECs in Georgia in 43 different central offices in 28 different cities. In Georgia, as of September 30, 2000, there were 128 virtual collocation arrangements in place, with another 12 virtual collocation arrangements in progress. Allegiance, MediaOne, and Mpower are among the CLECs that have made the most significant number of requests for virtual collocation from BellSouth in Georgia.

7. BellSouth provides access to unused transmission media, which in some cases is referred to as "Dark Fiber". (SGAT §II.B.7) BellSouth has no such arrangements in place in Georgia because to date no CLEC has requested such; however, there are ten (10) CLECs with dark fiber arrangements in place in three (3) states within BellSouth's nine-state region.

Checklist Item No. 3 (Poles, Ducts, Conduits, and Rights-of-Way)

8. As of November 8, 2000, there were 83 CLECs, including 43 that operate in Georgia, that have executed license agreements with BellSouth that allow them to attach their facilities to BellSouth's poles and/or place their facilities in BellSouth's ducts and conduits. CLECs operating in Georgia that have executed license agreements include MCImetro, Knology, Hyperion, Nextlink, TCG, Vyvx, Mpower, Level 3, and MFS. In addition, BellSouth has been providing cable television companies with access to poles, ducts, conduits, and rights-of-way for many years. Since July 1997, BellSouth has received and successfully responded to 798 requests for access to poles, ducts, conduits, and rights-of-way from 22 CLECs operating in Georgia. BellSouth has never denied an application/request when facilities/structures were available.

Checklist Item No. 4 (Loops)

9. As of September 30, 2000, BellSouth had provisioned 64,117 unbundled loops to 22 CLECs in Georgia, including 2,384 two-wire ADSL loops, 112 two-wire HDSL loops, and seven (7) four-wire HDSL loops. The majority of the unbundled loops were provided to Allegiance, KMC, and COVAD. As of that same date, BellSouth had provisioned 237,685 unbundled loops to CLECs in its nine-state region, including 8,356 two-wire ADSL loops, 380 two-wire HDSL loops, and 22 four-wire HDSL loops. The unbundled loops BellSouth provides to CLECs are of a quality equal to that of the loops BellSouth uses in the provision of its retail services, and are provided using the same equipment and technical specifications that BellSouth uses for itself.

10. BellSouth arbitrated the question of providing access to unbundled loops served by IDLC in each of its nine in-region states. In Georgia, this issue was raised in Docket 6801-U (AT&T), Docket 6865-U (MCI), and Docket 10854-U

(ITC^DeltaCom). In these arbitration proceedings, the Georgia PSC held that where loops are served by IDLC, BellSouth had to provide unbundled access through one of eight approved methods and BellSouth is in compliance with this Commission's Order.

Checklist Item No. 5 (Transport)

11. As of September 30, 2000, BellSouth had provided 1,889 dedicated local transport trunks to CLECs in Georgia, including MediaOne, Mpower, and KMC. BellSouth had provided 8,723 dedicated trunks for interoffice transport to CLECs in its nine-state region as of that same date. For common transport, CLEC traffic follows transmission paths identical to BellSouth's traffic, using the routing tables in BellSouth's central office switches.

Checklist Item No. 6 (Switching)

12. As of September 30, 2000, BellSouth had provided 321 unbundled switch ports and 47,798 unbundled combinations (loop and switch port) to CLECs in Georgia. Region-wide, BellSouth had provided 362 unbundled switch ports and 137,867 unbundled loop and switch port combinations to CLECs as of that same date, which evidences the availability of unbundled local switching from BellSouth. Many CLECs are providing their own switching capabilities and are interconnecting their networks to BellSouth's network via the interconnection trunks discussed earlier.

13. Customized routing (which has also been referred to as selective routing) allows the calls from a CLEC's customer served by a BellSouth switch to reach the CLEC's operator service or directory assistance service platforms instead of BellSouth's operator service and directory assistance service platforms. BellSouth makes available two different methods for customized routing.

Customized routing using the first method, Line Class Code, is available to all CLECs in Georgia and throughout BellSouth's nine-state region.

14. BellSouth's second method for providing selective routing is through the use of BellSouth's Advanced Intelligent Network (AIN) platform. 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 in May 1999 and successfully completed in August 1999. This method is available to CLECs in addition to the Line Class Code method.

15. BellSouth has not denied any requests for selective routing due to a lack of line class code capacity, and given the level of demand for selective routing experienced to date, there is no reason to believe that there is imminent danger of exhaustion of line class codes.

Checklist Item No. 7 (911 and E911, Directory Assistance and Operator Services

16. As of September 30, 2000, CLECs in Georgia have requested and BellSouth has provided 879 E911/911 trunks. In its nine-state region, as of that same date, BellSouth had provided 3,062 trunks connecting CLECs' switches with BellSouth's E911 arrangements. In its nine-state region, 58 CLECs were sending mechanized updates to BellSouth for inclusion in the 911 database as of September 30, 2000. Those mechanized updates include both end user customers to whom CLECs provide service via the resale provisions of the Act as well as those end user customers to whom facilities-based CLECs provide service from the CLECs' own switches or through the use of unbundled switch ports provided by BellSouth.

17. With respect to operator services and directory assistance, BellSouth has parity by design in that the flow of service orders from various sources (BellSouth's

retail units, CLEC resale, CLEC UNE, and CLEC UNE and resale with customized routing) is precisely the same regardless of the source of the service order. Universal Service Order Codes ("USOCs") on the service orders are used to establish switch translations that provide dial tone and various service features listed on each service request. The exact same list of USOCs, with the exception of four unique provisioning USOCs used for UNEs, is used on both BellSouth and CLEC orders to describe various features and functions. If the service order being processed is for a CLEC, it contains a special four-digit Field Identifier Code ("FID") that ultimately identifies the CLEC to the billing system. However, the FID is not input to the switch. Thus the switch is "blind" as to whether a given end user customer is BellSouth's customer or a CLEC's customer. The service orders enter a system called the Line Class Code Assignment Module ("LCCAM"). The LCCAM converts the USOCs assigned on service orders to a Line Class Code ("LCC"), a three-character entry that identifies the routing and screening characteristics of that line to the switch. Nothing in the LCC distinguishes a BellSouth customer from a CLEC customer. The LCC information flows into a computer system named MARCH. MARCH is a memory administration system that translates line-related service order data into switch provisioning messages and automatically transmits the messages to targeted stored program control system switches. Routing, screening, and trunking of calls by the switch are identical for lines containing identical LCCs. Therefore, it is not necessary to perform measurements beyond this point in the process to demonstrate parity in the handling of operator services and directory assistance calls. The LCCAM to MARCH handoff merges traffic from all sources into a single flow determined solely by LCCs.

18. The Traffic Operator Position System ("TOPS") Queuing Management System ("QMS") is where calls are initially queued based on call origination type. For example, a determination is made whether the call originated from a coin trunk group or a directory assistance trunk group. Next, calls are ordered based on whether or not they have previously received some form of automated treatment or operator handling. Then the calls are processed through six refinement tables to enable them to be handled by operator groups best equipped to handle specific types of calls. For example, this process routes calls requiring fluency in a particular language to operators with skills in that language. Finally, the calls are routed to queues based on such factors as the age of the call, equipment availability, and force management considerations. As a result, treatment of CLECs' customers' calls to BellSouth's TOPS platform are handled in a nondiscriminatory manner at parity with the treatment of calls from BellSouth's retail customers.

19. BellSouth provides CLECs with Directory Assistance Access Service (DAAS), which allows CLEC end users to obtain telephone listing information from BellSouth. CLECs also have access to BellSouth's Directory Assistance Call Completion (DACC) service, which gives the CLEC's end user the option to have a call to BellSouth's Directory Assistance (DA) completed automatically to the requested telephone number. Facilities-based CLECs obtain access to these services through trunks connecting the CLEC's point of interface to BellSouth's DA platform. As of September 30, 2000, BellSouth had provided 528 directory assistance trunks to CLECs in Georgia. In BellSouth's nine-state region, BellSouth had provided 2,547 directory assistance trunks to CLECs as of that same date. As of October 31, 2000, sixteen (16) CLECs were purchasing DAAS

and nine (9) CLECs were purchasing DACC from BellSouth in Georgia. These include e.spire, ICI, MCImetro, MediaOne, MFS, and Mpower. In its nine-state region, 39 CLECs were purchasing DAAS and 27 CLECs were purchasing DACC from BellSouth as of that same date.

20. CLECs also have access to BellSouth's intercept service, which refers calls from a disconnected or non-working telephone number to the proper telephone number or announcement. Facilities-based CLECs obtain access to BellSouth's intercept service through dedicated trunk facilities. As of September 30, 2000, BellSouth had provided CLECs in Georgia with 28 intercept trunks. In BellSouth's nine-state region, BellSouth had provided 170 intercept trunks to CLECs as of that same date.

21. BellSouth provides CLECs and other service providers with access to BellSouth's Directory Assistance Database Service (DADS). This allows the CLEC to use BellSouth's subscriber listing information to set up their own directory assistance services. BellSouth also provides CLECs and other service providers with access to BellSouth's Direct Access to Directory Assistance Service (DADAS), which gives CLECs direct access to BellSouth's DA database in order to provide a traditional directory assistance service. BellSouth currently provides both DADS and DADAS to CLECs and to various third-party service providers, which in turn furnish the service to CLECs. As of September 30, 2000, nine (9) service providers in Georgia were using BellSouth's DADS. Twelve (11) service providers were using DADS across BellSouth's nine-state region as of that same date. As of September 30, 2000, one (1) third party service provider was using DADAS in Georgia to provide service to CLECs. Two (2) third party service providers were using DADAS across BellSouth's nine-state

region as of that same date. BellSouth provides requesting carriers all subscriber listings in its databases, including those from CLECs and independent carriers.

22. Operator call processing, which allows CLECs to obtain both live operator and mechanized functionality, is available from BellSouth. Facilities-based CLECs can obtain access to BellSouth's operator call processing by connecting to BellSouth's operator services platform. As of September 30, 2000, BellSouth had provided 395 operator services trunks to CLECs in Georgia, including Mpower, US LEC, Teleport, and KMC. Across its nine-state region, BellSouth had provided CLECs with 2,521 operator services trunks as of that same date. In Georgia, BellSouth had provided CLECs 59 verification trunks as of September 30, 2000. Across its nine-state region, BellSouth had provided CLECs with 423 verification trunks as of that same date.

Checklist Item No. 9 (Numbering Administration)

23. During February 1998, Lockheed-Martin assumed the North American Numbering Plan Administrator (NANPA) functions previously provided by Bell Communications Research, Inc. (Bellcore). This did not include the central office code assignment and Numbering Plan Administration (NPA) relief planning functions that continued to be performed by the Incumbent Local Exchange Carrier (ILEC) serving the particular geographic territory until a transition plan could be finalized to transfer these functions to Lockheed-Martin. The central office code assignment function was transferred to Lockheed-Martin on a region-by-region basis based on an industry accepted transition plan. Specifically for BellSouth, that transition began July 6, 1998, and concluded August 14, 1998. NeuStar assumed all NANPA responsibilities on November 17, 1999 when the

FCC approved the transfer of Lockheed-Martin's Communication Industry Service division to NeuStar.

24. Responsibility for NPA relief planning has also transitioned to NeuStar. When BellSouth was responsible for NPA relief planning and a NPA was found to be in jeopardy of exhausting before a NPA relief plan could be implemented, the BellSouth Central Office Code Administration Center implemented code conservation measures complying with consensus decisions of the local industry as expressed in one or more Industry Jeopardy Meetings. NANPA now has the responsibility for jeopardy declaration in a given NPA, with current jeopardy situations in Georgia existing in the 678 NPA and the 912 NPA.

25. BellSouth, while serving as the Central Office Code Administrator for its territory, maintained neutrality in performing the code administration functions and ensured that CLECs had nondiscriminatory access to telephone numbers for assignment to their customers. BellSouth adhered to the code administration guidelines published by the Industry Numbering Council (INC); a national industry body under the Carrier Liaison Committee (CLC) sanctioned by the Alliance for Telecommunications Industry Solutions (ATIS). INC documents, including final documents, completed guidelines, and issue resolutions in final closure, are readily accessible via the Internet, at (http://www.atis.org/atis/clc/inc/inchom.htm). These guidelines provide instructions to all service providers including CLECs as to how to request and have NPA/NXX codes assigned. BellSouth established procedures to provide nondiscriminatory NXX code assignments to CLECs that conform to the INC standards. Pursuant to these procedures, BellSouth had assigned a total of 459 NPA/NXX codes for CLECs in Georgia as of August 19, 1998. In its nine-state

region, BellSouth had assigned 2,141 NPA/NXX codes for CLECs as of August 19, 1998. Other than in impending NPA exhaust situations, no requests from CLECs for NPA/NXX code assignments were refused by BellSouth either in Georgia or in BellSouth's nine-state region. BellSouth has never charged wireline providers for number administration and did not charge any carriers for number administration after 1996.

26. Since the Central Office Code Administration function has been transferred to the NANPA (now NeuStar), BellSouth no longer has any responsibility for the administration or assignment of central office codes (NXXs) to CLECs or any other telecommunications service provider. BellSouth follows the Central Office Code (NXX) Assignment Guidelines developed by the INC in submitting BellSouth's NXX code requests to NANPA, entering code information into the appropriate national databases, activating in BellSouth's network NXX codes assigned to any service provider, making available BellSouth NXX codes that are no longer in use, and all other areas covered by these and other appropriate industry guidelines. It is now NANPA's responsibility to supply competitively neutral number administration services and to ensure that all service providers have equal and non-discriminatory access to telephone numbers.

27. BellSouth furnishes data to NANPA (currently NeuStar). For example, BellSouth provides the following: (1) COCUS Report – BellSouth prepares a Central Office Code Utilization Survey (COCUS) Report and forwards it to NANPA pursuant to FCC directives. NANPA uses the COCUS Reports from all carriers to estimate when all NPAs (area codes) will exhaust. (2) Months-to-exhaust Worksheet – When BellSouth requests a new central office code assignment for growth from NANPA CO Code Administration, BellSouth submits a Months-to-Exhaust

Worksheet that shows when the existing supply of telephone numbers in the central office will exhaust. (3) Part 4 – New central office codes must be put to work within six months of being assigned or returned to NANPA. This is accomplished by the Code Holder who furnishes NANPA a Part 4 Form informing NANPA that the NXX has been put to work.

28. Where Number Pooling is in place, carriers must report additional items to the Pooling Administrator. Such data includes contamination levels of thousands blocks within assigned central office codes. However, pooling has not yet been implemented within any NPA that BellSouth serves so none of this reporting has yet been initiated.

Checklist No. 10 (Database and Signaling)

29. From January 1997 through October 2000, CLECs and other service providers across BellSouth's nine-state region completed approximately 5.2 billion queries to BellSouth's Toll Free Number database. Additional facilities-based CLECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Once the CLEC puts the required signaling links in place, access to the Toll Free Number database is available.

30. BellSouth's region-wide Line Information Database (LIDB) processed more than 1.4 billion queries from CLECs and others during the period January 1997 through September 2000. Access to the LIDB is at present through a third party "signaling hub" provider or interexchange carrier directly connected to BellSouth's signaling network. LIDB queries are billed to the third party "signaling hub" provider or interexchange carrier, not the CLEC. Accordingly, of the more than 1.4 billion queries completed, BellSouth cannot separate out the number completed by facilities-based CLECs. Facilities-based CLECs can,

however, obtain access to the database as described in BellSouth's tariff (FCC No. 1). Once the CLEC puts required signaling links in place, access to the LIDB database is available.

31. As of September 30, 2000, there were 18 facilities-based CLECs directly connected to BellSouth's signaling network and another nine (9) are interconnected by using a third-party signaling hub provider which in turn accesses BellSouth's signaling network. Additional facilities-based CLECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Once the CLEC puts the required signaling links in place, access to the signaling network is available.

32. Because BellSouth's Signal Transfer Point (STP) does not distinguish between BellSouth's end users and the end users of resellers, BellSouth does not know how many queries have been made to BellSouth's databases from the end-user customers of resellers.

Checklist Item No. 11 (Number Portability)

33. Interim number portability (INP) is available from BellSouth in accordance with applicable FCC requirements. BellSouth offered interim number portability under four methods which the Commission found to be technically feasible: (1) Remote Call Forwarding (RCF) and Direct Inward Dialing (DID); (2) Route Index-Portability Hub (RI-PH); (3) Directory Number-Route Index (DN-RI); and (4) Local Exchange Routing Guide (LERG) Reassignment. BellSouth agreed in certain interconnection agreements (for example, AT&T's agreement) to provide Route Index-Portability Hub (RI-PH) as a comparable arrangement in provisioning interim number portability. Similarly, BellSouth has agreed in certain interconnection agreements (for example, AT&T in connection with the AT&T

Arbitration in North Carolina Docket No. P-140, SUB 50) to provide interim number portability using the LERG Reassignment method.

34. As of September 30, 2000, BellSouth had successfully ported 4,012 business directory numbers and 655 residence directory numbers for CLECs in Georgia using interim number portability ("INP") solutions. The predominant CLECs requesting INP with respect to business directory numbers are e.spire and KMC. As of September 30, 2000, Mpower and Knology were the primary CLECs with ported residence directory numbers. In its nine-state region, BellSouth had ported 37,447 business and 922 residence directory numbers as of September 30, 2000, which evidences the availability of INP.

35. As to the implementation of a long-term number portability ("LNP") solution, BellSouth has implemented permanent number portability in Georgia in accordance with FCC rules. As of September 30, 2000, BellSouth had ported 207,987 business directory numbers and 45,104 residence directory numbers in Georgia using LNP. In its nine-state region, BellSouth had ported 855,240 business and 87,641 residence directory numbers as of September 30, 2000, which evidences the availability of LNP.

Checklist Item No. 14 (Resale)

36. CLECs are reselling significant quantities of BellSouth's retail telecommunications services. Exhibit WKM-1, which is attached to this affidavit, identifies the service and the number of units being resold in Georgia and BellSouth's nine-state region as of September 30, 2000.

37. This concludes my affidavit.

I hereby swear that the foregoing is true and correct to the best of my information and belief

W. Keith Milner

Senior Director–Interconnection Services

BellSouth Telecommunications, Inc.

Subscribed and sworn to before me this 21st

Day of November, 2000.

Notary Public

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

	-	-	4	-	-	-	3	-	-	7
ACCUPULSE #1	2,473	8,865	5,827	1,367	7,612	2,832	641	2,244	4,619	36,480
AREA PLUS #2	176	632	710	176	573	146	347	280	277	3,317
BASIC RATE ISDN #3	41	210	101	13	210	71	43	111	24	824
PRIMARY RATE ISDN #4	18,176	31,566	56,251	9,246	36,722	25,578	20,868	18,233	17,904	234,544
CALL WAITING #5	4,636	13,905	18,758	1,730	6,127	3,420	5,395	1,228	5,051	60,250
CALL WAITING DELUXE #6	12,720	32,985	44,753	7,898	23,454	19,383	13,996	9,336	13,625	178,150
CALLER ID DELUXE #7	185	1,046	334	121	253	123	67	114	139	2,382
CALLER ID ENHANCED #8	1,252	1,218	6,318	1,157	1,298	1,038	2,287	4,119	334	19,021
CENTREX/ ESSX # 9	4,595	19,138	26,930	1,582	8,001	5,004	5,256	2,489	6,551	79,546
CUSTOM CALLING - 3 WAY CALLING #10	6,051	17,791	15,408	2,413	8,114	4,793	6,951	2,399	5,693	69,613
CUSTOM CALLING - CALL FORWARDING VARIABLE #11	294	3,115	1,211	205	386	177	366	366	263	6,383
CUSTOM CALLING - REMOTE ACCESS TO CF #12	4,505	12,040	21,676	1,441	4,346	2,661	5,645	1,059	7,677	61,050
CUSTOM CALLING - SPEED CALLING 8 & 30 #13	434	1,162	1,089	381	1,000	448	463	333	210	5,520
DID #14	-	-	-	-	-	-	-	-	-	-
E911/SALI #15	7	360	142	14	19	-	11	39	26	618
ENH CID/MULTILINE CID DELUXE/ENH CID ACR #16	875	4,246	3,087	1,061	730	582	270	1,199	224	12,274
FLAT RATE PBX TRUNKS #17	33,237	58,845	90,287	19,404	59,265	41,611	71	38,730	32,720	374,170
FLAT RATE RESIDENCE #18	18,652	86,407	41,797	14,635	17,939	3,712	18	19,620	9,460	212,240
FLAT RATE/BASIC LOCAL EXCHANGE # 19	1	47	64	-	119	-	1	1	-	233
FLEXSERV #20	204	348	1,402	38	191	136	257	167	87	2,830
FRAME RELAY AND CDS #21	-	-	1,889	-	-	-	-	-	-	1,889
GEORGIA COMMUNITY CALLING #22	11,051	48,275	21,185	8,570	10,583	3,003	16,785	13,983	4,604	138,039
HUNTING #23	159	4,239	1,288	779	845	382	714	158	966	9,530
INDEPENDENT PAYPHONE PROVIDER #24	1,797	-	1,889	438	11,388	13,217	69,090	1,601	3,026	102,446
INTEGRATED PACKAGES #25	-	-	1	-	-	-	-	-	-	1
LIGHTGATE #26	167	1,675	302	199	1,011	177	299	474	579	4,883
MEASURED RATE BUSINESS # 27	2	215	561	5	21	114	-	54	83	1,055
MEASURED RATE RESIDENCE #28	265	312	468	26	665	82	291	71	58	2,238
MEGALINK #29	12	7	1	1	18	-	-	2	19	60
MEGALINK ISDN # 30	2,380	13,565	10,383	816	2,731	973	5,142	3,112	1,921	41,023
MEMORYCALL # 31	56	101	70	53	51	45	37	45	57	515
MESSAGE TELEPHONE SERVICE (MTS) #32	366	4,319	370	122	1,100	524	1,228	169	776	8,974
MEASURED RATE PBX TRUNKS #33	78	1,651	2,598	108	763	137	335	238	43	5,951
MULTISERV #34	-	-	-	-	-	-	-	-	-	-
NATIVE MODE LAN INTERCONNECTION #35	78	180	137	58	263	38	191	46	73	1,064
OFF PREMISE EXTENSIONS (OPX) # 36	125	615	393	345	494	789	3,497	2,413	190	8,861
OPTIONAL CALLING PLAN # 37	325	3,280	1,662	163	517	215	955	535	306	7,958
REMOTE CALL FORWARDING (RCF) #38	793	2,917	2,989	478	910	802	1,002	806	2,224	12,921
RINGMASTER #39										
										-
SMARTPATH #40	-	-	-	-	1	-	-	-	-	1
SMARTRING #41										

SYNCHRONET #42	27	141	268	16	146	22	112	68	29	829
TOUCHSTAR -CALL BLOCK #43	3,585	11,246	10,821	1,432	3,837	2,275	4,758	1,189	5,341	44,484
TOUCHSTAR -CALL RETURN #44	6,588	19,162	27,398	2,518	7,713	6,332	10,948	3,812	7,697	92,168
TOUCHSTAR -CALL SELECTOR #45	671	4,009	6,149	202	734	463	793	403	1,201	14,625
TOUCHSTAR -CALL TRACING #46	1,353	7,162	7,060	459	2,015	1,462	1,565	815	3,189	25,080
TOUCHSTAR -PREFERRED CALL FORWARDING #47	240	343	635	79	216	139	212	78	203	2,145
TOUCHSTAR -REPEAT DIALING #48	3,806	11,874	10,598	1,361	4,876	3,530	4,019	1,046	5,692	46,802
TOUCHTONE #49	48,178	138,246	122,914	31,575	84,658	52,317	60,747	53,639	43,274	635,548
VISUAL DIRECTOR # 50	-	-	3	-	-	2	-	-	-	5
TOTAL	190,616	567,460	568,181	112,685	311,915	198,755	245,676	186,824	186,435	2,568,547

CERTIFICATE OF SERVICE
6863-U/7253-U

This is to certify that I have this day served a copy of the within and foregoing, **Affidavit of W. Keith Milner**, upon all known parties of record, by depositing in the United States Mail, addressed as follows:

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[signature on the following page]

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JMB-4
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This 22nd of November, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

BENNETT L. ROSS
General Counsel – Georgia
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(770) 391-2416

141847

8.0 Requirements Review Minutes

October 12, 2000

Document Preparation Information

PROJECT NAME	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED
Rel 8 0 User Requirements Review	Kevin McCall		10/13/00

Announcement Information

TO	COMPANY	TO	COMPANY
Brenda Jones	BellSouth	Valerie Cottingham	BellSouth
Kevin McCall	BellSouth	Cheryl Story	BellSouth
Kathy Smith	BellSouth	Darryl Castellaw	BellSouth
Liz Goings	BellSouth	Jaime Hunter	KPMG
Wayne Johnson	BellSouth	Stephanie Smith	DSET
Yvette Brown	E spire	Woody Roe	Albion Connect
Bob Henderson	SBC Telcom	Michelle Jones	Sprint
Lorraine Watson	WorldCom		

Meeting Information

DATE	START TIME	END TIME	LOCATION
10/12/00	10:00 A.M. EDT	12:30 P.M. EDT	205-970-3744 Access code 6637

Review of User Requirements for ENCORE Release 8.0

CALLED BY	PHONE	FAX
Change Control	205-321-2113	205-321-5160

Agenda

Agenda Items	Discussions
Introductions	
OS/DA	BST CCP advised that the OS/DA change request would be handled outside of Release 8 0 A new database called Originating Line Number Screening (OLNS) is being finalized that will provide this service in a more efficient manner A meeting to discuss OLNS with interested CLECs is being coordinated for Monday, October 16, 2000 CCP also advised that the Methods and Procedures for OLNS are still under development.

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JMB-5
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8.0 Requirements Review Minutes

October 12, 2000

Agenda Items	Discussions
TAG Platform Upgrades	BST provided an overview of the TAG platform enhancements that are in scope for TAG Release 7 5, included in Release 8 0 Those enhancements include a change from HP Unix 10 2 to 11 0 There will be no new functionality associated with this upgrade for TAG 2 3 (Issue 7) For TAG 7 5, the addition of DID is the only change in functionality from 7 1 2 1 A question was asked as to which TAG Release would be the base Release for the system upgrades due to the sunset of several TAG versions BST will follow up and advise The response since provided is Versions 2 2 0 11 and 7 1 2 Another question was raised asking if the CLECs are now responsible for gaining software licenses for the platform changes BST responded that this should be handled in the same manner that is in place today
Review of 8 0 User Requirements	BST reviewed the requirements of the following documents 9343—LENS to allow basic class of service 9883—add the word "add, change and delete" to the feature to add field 10212—Strip USOCS not available for CSR The DID user requirement documents, LEO5005 and LEO8610, were not reviewed individually since this is not new functionality The feature being implemented with Release 8 0 provides the ability to order DID via TAG BST took an action item to advise when the BellSouth Business Rules for Local Ordering (BBR-LO) document will be updated with the DID information The response to the action item is that the DID business rules are already published in the existing BBR-LO BST advised that the user requirements for CLEC change requests that are not code impacting were reviewed as a courtesy to the CLEC community Going forward, a review of only the code impacting user requirements will be held, and the non-code impacting user requirements will not be reviewed unless requested.

10/16/00 OLNS Meeting Minutes

Participants.

Evelyn Ruffin, WorldCom
Sherri Lichtenberg, WorldCom
Graham Watkins, KPMG
Sandy Evans, Sprint
Trya Hush, WorldCom
Jennifer Browbridge, Birch Telcom
Sherrian Lively, Trivergent
Jill Williamson, AT&T
Jane Hunter, Sprint
Toni Martin, dset
Rhonda McKinney, BST
Claudette Hawkins, KMC
Thomas McFall, BST
Jeff Anderson, BST
W Kay, KMC
Valerie Cottingham, BST
Cheryl Storey, BST

Purpose of Meeting

Provide an overview of Originating Line Number Screening (OLNS)

Opening

Valerie Cottingham opened the meeting and stated that the change request for electronically order routing to OS/DA was removed from the Release 8 0 scope because BellSouth is currently in the process of finalizing the Originating Line Number Screening (OLNS) database option that will provide this service in a more efficient manner

OLNS Discussion

Jeff Anderson stated that the OLNS database would eliminate the need for CLECs to specify Line Class Codes for selective routing It will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding options and reduce the cost of trunks for non-facility based CLECs when the Custom Branding option is selected The target date for providing OLNS to non-facility based CLECs is by the end of the year for the state of Georgia

OLNS will be driven by information off of the service order

10/16/00 OLNS Meeting Minutes

Participants.

Evelyn Ruffin, WorldCom
Sherri Lichtenberg, WorldCom
Graham Watkins, KPMG
Sandy Evans, Sprint
Trya Hush, WorldCom
Jennifer Browbridge, Birch Telcom
Sherrian Lively, Trivergent
Jill Williamson, AT&T
Jane Hunter, Sprint
Toni Martin, dset
Rhonda McKinney, BST
Claudette Hawkins, KMC
Thomas McFall, BST
Jeff Anderson, BST
W Kay, KMC
Valerie Cottingham, BST
Cheryl Storey, BST

Purpose of Meeting

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OLNS will be driven by information off of the service order

Jill (AT&T) questioned whether OLNS would support a non-facility CLEC if they chose someone other than BST for OS/DA We should have the response for this question once OLNS is rolled out

There is a project team working on cost issues and ordering procedures Additional information will be provided as this team finalizes these issues

Target Timeline for OLNS

Complete M&Ps
Complete loading of the OLNS database by end of October to mid November
Complete end-to-end testing (internal)
State of Georgia – First state to implement by 12/31/00
All other states will be rolled out in phases – 2Q01 Target Completion date

The CLECs recommended that the timeline be distributed through Change Control for project coordination and user requirements Valerie advised that Change Control would coordinate this effort and provide additional information on the status of OLNS as the outstanding issues are finalized

Contracts would need to be discussed with your Account Team representative

10/16/00 OLNS Conference Call with AT&T
Meeting Notes

Participants.

Jill Williamson – AT&T
Rich Bobik – AT&T
Jeff Anderson – BST
Sandra Jones – BST
Beverly Shelton-Williams – BST
Rhonda McKinney – BST
Valerie Cottingham – BST
Cheryl Storey – BST

Purpose of Meeting:

Provide an overview of Originating Line Number Screening (OLNS).

Opening

Valerie opened the meeting and stated that BellSouth has changed the delivery method for providing OS/DA selective routing electronically. The Originating Line Number Screening (OLNS) database is an option that BellSouth is currently in the process of finalizing that will provide this service in a more efficient manner

OLNS Discussion

Jeff Anderson stated that OLNS would benefit both CLECs and BellSouth. OLNS will eliminate the need for CLECs to specify Line Class Codes for selective routing It will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding options and reduce the cost of trunks for non-facility based CLECs when the Custom Branding option is selected BellSouth is working to complete the OLNS database by the end of October/mid-November time frame. End-to-end testing will need to be conducted before rolling out this service. M&Ps are being developed and will be completed prior to the rollout of this service.

A Special Provider ID (SPID) will drive OLNS The SPID contains the owner of the line. AT&T would have a SPID common to AT&T. Jill questioned if this would be the same SPID that they use for LNP? The answer to this question is not known at this time. It was stated that we believe the OCN will be used as the SPID

OLNS is a part of LIDB and also is an alternative to AIN.
There are three options for selective routing· AIN, LCCs and OLNS.

There is no need to set up OLNS if a CLEC wishes to use the default BellSouth OS/DA.

There is a project team working on cost issues and ordering procedures Additional information will be provided as this team finalizes these issues.

Target Timeline for OLNS

Complete loading of the OLNS database by end of October to mid November
Complete end-to-end testing
State of GA – 1st state to implement by 12/31/00
All other states will be rolled out in phases – Targeted to be completed by 2Q01.

AT&T stated an interest in testing with BellSouth if we decide to test OLNS with CLECs.

Rhonda McKinney will be the liaison with the AT&T Account Team on OLNS.

10/16/00 OLNS Meeting Minutes

Participants.

Evelyn Ruffin, WorldCom
Sherri Lichtenberg, WorldCom
Graham Watkins, KPMG
Sandy Evans, Sprint
Trya Hush, WorldCom
Jennifer Browbridge, Birch Telcom
Sherrian Lively, Trivergent
Jill Williamson, AT&T
Jane Hunter, Sprint
Toni Martin, dset
Rhonda McKinney, BST
Claudette Hawkins, KMC
Thomas McFall, BST
Jeff Anderson, BST
W Kay, KMC
Valerie Cottingham, BST
Cheryl Storey, BST

Purpose of Meeting

Provide an overview of Originating Line Number Screening (OLNS)

Opening

Valerie Cottingham opened the meeting and stated that the change request for electronically order routing to OS/DA was removed from the Release 8 0 scope because BellSouth is currently in the process of finalizing the Originating Line Number Screening (OLNS) database option that will provide this service in a more efficient manner

OLNS Discussion

Jeff Anderson stated that the OLNS database would eliminate the need for CLECs to specify Line Class Codes for selective routing It will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding options and reduce the cost of trunks for non-facility based CLECs when the Custom Branding option is selected The target date for providing OLNS to non-facility based CLECs is by the end of the year for the state of Georgia

OLNS will be driven by information off of the service order

Jill (AT&T) questioned whether OLNS would support a non-facility CLEC if they chose someone other than BST for OS/DA We should have the response for this question once OLNS is rolled out

There is a project team working on cost issues and ordering procedures Additional information will be provided as this team finalizes these issues

Target Timeline for OLNS

Complete M&Ps
Complete loading of the OLNS database by end of October to mid November
Complete end-to-end testing (internal)
State of Georgia – First state to implement by 12/31/00
All other states will be rolled out in phases – 2Q01 Target Completion date

The CLECs recommended that the timeline be distributed through Change Control for project coordination and user requirements Valerie advised that Change Control would coordinate this effort and provide additional information on the status of OLNS as the outstanding issues are finalized

Contracts would need to be discussed with your Account Team representative

10/16/00 OLNS Conference Call with AT&T
Meeting Notes

Participants.

Jill Williamson – AT&T
Rich Bobik – AT&T
Jeff Anderson – BST
Sandra Jones – BST
Beverly Shelton-Williams – BST
Rhonda McKinney – BST
Valerie Cottingham – BST
Cheryl Storey – BST

Purpose of Meeting:

Provide an overview of Originating Line Number Screening (OLNS).

Opening

Valerie opened the meeting and stated that BellSouth has changed the delivery method for providing OS/DA selective routing electronically. The Originating Line Number Screening (OLNS) database is an option that BellSouth is currently in the process of finalizing that will provide this service in a more efficient manner

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Jeff Anderson stated that OLNS would benefit both CLECs and BellSouth. OLNS will eliminate the need for CLECs to specify Line Class Codes for selective routing It will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding options and reduce the cost of trunks for non-facility based CLECs when the Custom Branding option is selected BellSouth is working to complete the OLNS database by the end of October/mid-November time frame. End-to-end testing will need to be conducted before rolling out this service. M&Ps are being developed and will be completed prior to the rollout of this service.

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OLNS is a part of LIDB and also is an alternative to AIN.
There are three options for selective routing· AIN, LCCs and OLNS.

There is no need to set up OLNS if a CLEC wishes to use the default BellSouth OS/DA.

There is a project team working on cost issues and ordering procedures Additional information will be provided as this team finalizes these issues.

Target Timeline for OLNS

Complete loading of the OLNS database by end of October to mid November
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State of GA – 1st state to implement by 12/31/00
All other states will be rolled out in phases – Targeted to be completed by 2Q01.

AT&T stated an interest in testing with BellSouth if we decide to test OLNS with CLECs.

Rhonda McKinney will be the liaison with the AT&T Account Team on OLNS.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:	:	
AT&T'S Petition for Arbitration of Rates, Terms and Conditions with BellSouth Telecommunications	:	Docket No. 11853-U

Hearing Room 507
47 Trinity Avenue
Atlanta, Georgia

Tuesday, October 31, 2000

The above-entitled matter came on for hearing pursuant to adjournment at 2:03 p.m.

BEFORE:

ROBERT DURDEN, Chairman
DAVID BURGESS, Vice Chairman
LAUREN "BUBBA" MCDONALD, Commissioner
ROBERT BAKER, Commissioner

* * *

APPEARANCES:

On behalf of AT&T Communications of the Southern States, Inc.:

SUZANNE OCKLEBERRY, Attorney
JAMES LAMOUREUX, Attorney
MARSHA RULE, Attorney
AT&T Communications of the Southern States, Inc.
1200 Peachtree Street, Suite 8100
Atlanta, Georgia 30309

On behalf of BellSouth Telecommunications, Inc.:

DOUGLAS LACKEY, Attorney
BENNETT ROSS, Attorney
BellSouth Telecommunications, Inc.
125 Perimeter Center West, Room 376
Atlanta, Georgia 30346

On behalf of Consumers' Utility Counsel:

JIM HURT, Attorney
KEALIN CULBREATH, Attorney
Consumers' Utility Counsel Division
2 MLK Jr. Drive, Suite 356
Plaza Level, East Tower
Atlanta, Georgia 30334

On behalf of the Commission Adversary Staff:

THOMAS BOND, Attorney
Special Assistant Attorney General
State Law Department
40 Capitol Square
Atlanta, Georgia 30334

I N D E X

WITNESSES:	DIRECT	CROSS	REDIRECT	RECROSS
David L. Talbott				
By Mr. Lamoureaux	612	--	721	--
By Mr. Lackey	--	676	--	--
Alphonso J. Varner				
By Mr. Ross	727	--	--	--
Keith Milner				
By Mr. Lackey	809	--	947	--
By Mr. Lamoureux	--	899	--	--
Ronald M. Pate				
By Mr. Lackey	951	--	--	--
By Ms. Rule	--	1089	--	--

EXHIBITS:	FOR IDENTIFICATION	IN EVIDENCE
AT&T:		
47 through 61 - Talbott Exhibits	669	726
62 through 64 - Talbott Exhibits	721	726
65 - CLEC Information Package	940	947
66 - LA-II Order Excerpt	1109	1112
BellSouth:		
4 and 5	--	611
6 - Diagram	681	725
7, 8 Diagrams	692	725
9 through 12 - Varner Exhibits	728	729
13 - Varner Summary	804	804
14 through 21 - Milner Exhibits	809	950
22 - Milner Exhibit	887	950
23 through 39 - Pate Exhibits	1083	1111

own and operate. So we're not singling AT&T's employees out, we're not asking them to do anything we don't do for our own prospective employees. We're just saying simply, AT&T, for those employees that you send in to BellSouth's buildings, if they've not been your employee for over five years, do -- you know, show us that you've done a criminal background check. That's really all we're asking.

Q Let's change the subject to OSMDA. At page 63 of your testimony, you say that the line class code and AIN methods are available today. BellSouth has not made electronic ordering of both those solutions available as of today, has it?

A No, it has not.

Q And do you understand that the real issue here is that AT&T wants to be able to order the routing electronically, not that AT&T wants more than one routing option?

A No, I don't think that is the entirety of the issue. As I read Mr. Mills' testimony and Mr. Bradbury's testimony, I think there also is a disagreement as to the so-called footprint orders. But regarding the first issue of electronic ordering, BellSouth will accommodate electronic ordering, either in release 8.0 of its electronic access, which I believe will be available on November 18th of this year, or possibly in a point release that may happen

two to three weeks after that. So that would overcome the problem of electronic ordering that you mentioned.

COMMISSIONER BURGESS: Let me ask a question. There seemed to be some uncertainty last night whether or not the electronic ordering is or is not in the next release. Can you say with some definity that it is or not?

THE WITNESS: No, sir, unfortunately as I sit here, I cannot. I talked with my boss and with the people who are responsible for getting that change into the point release -- or into our what we call encore releases. And they said that it would either be in release 8 or it would be in a point release, which would be two to three weeks after that November date. So that's as definitive as I can be at this moment.

COMMISSIONER BURGESS: If you could, I would request that as a late file hearing exhibit for this proceeding to update the Commission on the status of whether or not the electronic ordering will be available or will not be available in the current -- in the next proposed release or some subsequent release.

THE WITNESS: Yes, sir, we'll be glad to do that. And I should know just really within the -- and even perhaps by tomorrow morning whether -- you know, whether we'll be in 8.0 or in a point release. So I'll be glad to do that.

BY MR. LAMOUREUX:

Q In fact, Mr. Milner, isn't it correct that BellSouth has dropped the electronic ordering capability from its expected capabilities of release 8?

A No, sir, that's not correct, and here's why. I think what you may be referring to is a memorandum that was sent to CLECs last week or the week before that said that that had -- that that electronic ordering capability had been dropped from release 8.0. That was a mistake on the people -- on the part of the people that released that memorandum. A copy of that memorandum was left in my chair in my office. The first thing I did when I came in to work that morning and found that memo was to find the people that had written that memo and had them in my office and had them retract that to show that the line class code method would be available. And I immediately set about making sure that the people doing the software upgrades did not divert their attention and move that out of release 8.0. So that's -- that's an unfortunate e-mail or memorandum that might have been sent to AT&T, and in fact, all CLECs, but in fact, it was a mistake on the part of the people that sent that. We've corrected that.

Q To your knowledge, has BellSouth sent out another memorandum saying that the first memorandum was a mistake?

A A -- yes. The -- I directed the production of the

second memorandum that said that the line class code method would still be available, in addition to another method called OLNS. So yes.

Q When did that memorandum go out, to your knowledge?

A Just off the top of my head, it was the day after the first one was sent.

Q You were in the North Carolina arbitration, correct?

A Yes, sir, I was.

Q Did you hear in that arbitration Mr. Pate agree to provide to AT&T all the methods and procedures necessary for AT&T to be able to place this footprint order?

A I heard that yes.

Q To your knowledge, has BellSouth provided all those methods and procedures?

A Yes, it has. I understand -- in fact, I wrote myself a note here, if I can find it. I think the -- I think Mr. Mills said yesterday that part of that information AT&T had received and that it was waiting on another part. My understanding is that the part that Mr. Mills has not yet seen addressed electronic ordering, using the line class code method for calls that would be sent to AT&T's platform rather than BellSouth's platform. I spoke to the people responsible for that and they tell me that on October 26,

just a few days ago, Michael Willis of the AT&T account team sent that information to AT&T.

So I understand that that information has, in fact, been provided.

Q Are those all the methods and procedures necessary for placing a footprint order?

A To my knowledge, they are, yes. I'm not an ordering expert so you may, you know, ask Mr. Pate that same question, but that's my understanding.

Q Okay. Let's change subjects and go to hot cuts for a moment.

A Okay.

Q Would you agree with me that ensuring accurate and timely hot cuts is important to development of facilities-based competition?

A Certainly.

Q A firm order confirmation indicates only that an order has been submitted by a CLEC without errors, correct?

A That's right. It's a -- what we call a so-called clean order, that the order itself can be fulfilled. There are not -- there are not errors in the order that would, you know, leave us with doubt as to what we were supposed to do. The FOC or firm order confirmation also does show the due date on which the cutover would be completed.

Q But a FOC does not guarantee that service will be

BellSouth Telecommunications, Inc.
Legal Department
125 Perimeter Center West
Suite 376
Atlanta, GA 30346

Bennett L. Ross
General Counsel - Georgia

770 391 2416
Fax 770 391 2812

November 13, 2000

DELIVERED BY HAND

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W., Room 520
Atlanta, Georgia 30334

Re: In the Matter of: Interconnection Agreement Negotiations Between AT&T Communications of the Southern States, Inc., Teleport Communications Atlanta, Inc., and BellSouth Telecommunications, Inc.; Docket No. 11853-U

Dear Ms. O'Leary:

Enclosed herein please find an original and nineteen (19) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Late File Hearing Exhibits for W. Keith Milner in the above-referenced docket. I would appreciate your filing same and returning the four (4) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Very truly yours,

Bennett L. Ross

BLR:nvd
Enclosures

cc: Parties of Record

235572

BellSouth Telecommunications, Inc.
GPSC Docket No. 11853-U
October 31, 2000
Late File Hearing Exhibit No. 1
Page 1 of 1

REQUEST: Please provide an update on the status of whether or not the electronic ordering will be available in the next proposed Encore release or some subsequent release.

Response: Change Request #EDI020900_001 Electronically Order Routing to OS/DA will be included in Release 8.0, which is scheduled to be implemented on November 18, 2000. Once implemented, this electronic ordering capability will automatically identify and generate specified Line Class Codes ("LCC") on behalf of AT&T when AT&T selects the OS/DA unbranded option. Because of the number of operational issues associated with the LCC method of customized routing, other CLECs seeking to avail themselves of this electronic ordering capability must contact their respective account teams.

As BellSouth witness Milner testified at the hearing, an e-mail was sent to CLECs on October 11, 2000 indicating that Change Request #EDI020900_001 Electronically Order Routing to OS/DA had been removed from Release 8.0. Clarification of this issue was subsequently provided to CLECs by e-mail the next day. Copies of both the October 11, 2000 and October 12, 2000 e-mails, which had been requested informally by AT&T, are attached.

October 11, 2000

Attention CLECs,

There has been a change in the scope for Release 8.0. Change Request #EDI020900_001 Electronically Order Routing to OS/DA has been removed from the scope because BellSouth has developed a more efficient method of delivering this service. BellSouth is in the process of finalizing a new database called Originating Line Number Screening (OLNS) that will eliminate the need for CLECs to specify Line Class Codes for selective routing. OLNS will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding services. OLNS is more efficient for the following reasons:

- It is a central database accessible from every Operator Services switch
- It eliminates the need for separate trunk groups

BellSouth is committed to providing the best solution to the CLEC community.

Additional details are forthcoming.

Please let us know if you have questions.

Thanks,

Change Control Team

October 12, 2000

Attention CLECs,

This is in clarification to the email that you received on October 11 regarding Change Request #EDI020900_001 – Electronically Order Routing to OS/DA. CLECs can currently submit a manual OS/DA order to BellSouth using Line Class Codes or by using our AIN Solution. Customized routing can still be ordered manually. Originating Line Number Screening (OLNS) is an addition to this option. We are only removing the Change Request for mechanizing the ordering process from Release 8.0.

Please let us know if you have questions.

Thanks,

Change Control Team

BellSouth Telecommunications, Inc.
GPSC Docket No. 11853-U
October 31, 2000
Late File Hearing Exhibit No. 2
Page 1 of 1

REQUEST: Please provide implementation time frame and cost involved in BellSouth's providing a facilities database check before returning the FOC transmission to a CLEC.

Response: A change request for BellSouth to provide connecting facility assignment (CFA) as part of its pre-order functionality is being provided through BellSouth's Change Control process. This change request was prioritized and scheduled for implementation on June 30, 2001. Since this change request is in a developmental stage, the costs associated with providing this functionality have not yet been determined. In the meantime, BellSouth will continue to work diligently with AT&T to resolve CFA discrepancies. As an interim process, BellSouth will continue providing a download of AT&T's CFA data via a secured website. This download allows AT&T to resolve discrepancies that may exist between AT&T records and BellSouth databases. Discrepancies are submitted to BellSouth for database correction via a spreadsheet to the BellSouth Account Team. The BellSouth Account Team will handle the clearing of any discrepancies through the Local Carrier Service Center.

CERTIFICATE OF SERVICE
Docket No. 11853-U

This is to certify that I have this day served a copy of the within and foregoing, **BellSouth Telecommunications, Inc.'s Late File Hearing Exhibit No. 1 and Exhibit No. 2 for W. Keith Milner,** upon all known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

Jim Hurt, Esquire
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334

Thomas K. Bond, Esquire
Special Assistant Attorney General
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Suzanne W. Ockleberry, Esquire
AT&T – Law & Government Affairs
Suite 8100
1200 Peachtree Street, N.E.
Atlanta, GA 30309-3579

Mr. Jeffrey C. Stair
Hearing Officer
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

This 13th day of November, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

BENNETT L. ROSS
125 Perimeter Center West
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Atlanta, Georgia 30375
(404) 335-0754

199149

BELLSOUTH

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Change Control Monthly Status Meeting	Steve Hancock - Change Control Team	10/26/00

Participants

PARTICIPANT	COMPANY
Brenda Files	BST – CCP
Valerie Cottingham	BST – CCP
Cheryl Storey	BST - CCP
Steve Hancock	BST – CCP
Bill Grant	Telcordia
Brian Rutter	KPMG
Kevin McCall	BST - NCS/CS
John Duffey	FL – PSC
Phyllis Burt	Quintessent
Carolyn Harris	Mpower
Selange Roberts	e spire
Jean John	Quintessent
Kim Gillette	Quintessent
Shamone Stapler	ITC/Deltacom
Stephanie Smith	dset

PARTICIPANT	COMPANY
Sandy Evans	Sprint
Tyra Hush	Worldcom
Steve Murray	Rhythms
James Hunter	KPMG
Bob Mason	KPMG
Peggy Rehm	Nightfire
Anthony Zerillo	Birch Telecom
Michelle Ewton	XO
Marcia Lees	SBC Telecom
Keen Lee	Andersen Consulting/Ztel
Donna Graham	Mantiss
Jay Bradbury	AT&T
Donna Cain	AT&T
Sherian Lively	Trivergent
Gene Piatkowski	BST

Meeting Information History

DATE	START TIME	END TIME
10/25/00	10:30 AM EDT	12 NOON EDT

MEETING PURPOSE / AGENDA

Review status of pending/approved Change Requests (including defects), review current Release Management statuses and discuss Change Control Process.

BELLSOUTH

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
1. 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 – Change Control Process - Letter of Authorization (LOA) for Service Provider Participation - Updates to the Maintenance Interfaces • Summarize Action Items
2. REGULATORY MANDATES	CR0059 – Change TN Reservation Period to 45 days (pre-ordering functionality) FCC Docket #99200 – Order # FCC00-104 *Status*: The deadline for compliance has been extended until December 2000 Target date for implementation is 4Q00. CR0169 – Conservation Rules for Number Pooling. FCC99-200 (revised on 3/31/00 to FCC00-104). Florida 954 – FCC99-249. Florida State PSC docket number is 981-444TP. *Status*: Targeted for Release 9 0 implementation (01/06/01 and 01/20/01)
3. OUTSTANDING ACTION ITEMS	The following outstanding Action Items are noted from the 9-27-00 Change Review/Monthly Status Meeting:
	ACTION ITEM (BELLSOUTH) – CLOSED – Distribute notification to CLEC community regarding October CCP Process Improvement meeting. Status: Distributed 9-28-00
	ACTION ITEM (BELLSOUTH) – OPEN – Provide revision history with Carrier Notification Letters associated with documentation updates Status: This issue was discussed at the CCP Process Improvement Meeting on Oct. 17 and an update will be provided in the follow-up meeting on 11/01/00
	ACTION ITEM (BELLSOUTH) – CLOSED – Have BST SMEs available at the Monthly Status Meetings to discuss Carrier Notification Letters distributed via Change Control. This issue to be addressed at the October Process Improvement meetings. Status: BellSouth will commit to having SME's at the monthly status meetings if CCP requests from the CLECs at least a two (2) weeks notice prior to the scheduled meeting.

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - OPEN - Defect/Expedite Process Status: As a result of the October Process Improvement meeting, BellSouth will commit to identifying a common definition for defects Status will be provided at the follow-up meeting on 11-01. Jay Bradbury (AT&T) questioned whether BST would continue to use the definition documented in the CCP process document. Tyra Hush went on record as stating that Worldcom does not agree with the current definition of "Defects" as documented in the CCP Process document. Valerie Cottingham (BST) reiterated to the CLECs that the "Defect/Expedite" process is still in "draft" mode, and acknowledged that BST still has some internal issues pertaining to the definition of defects This will be addressed at the 11-01 Process Improvement meeting
	ACTION ITEM (BELLSOUTH) - OPEN - BST provide milestones for Release management. Status: Discussed at the October Process Improvement meeting and status will be provided at the follow-up meeting on 11-01
	ACTION ITEM (BELLSOUTH) - CLOSED - Change Control will provide a soft copy of Number Pooling presentation. Status: Presentation provided with 9-27-00 meeting minutes.
	ACTION ITEM (BELLSOUTH) - CLOSED - Change Control will distribute notification regarding EDI Infrastructure Upgrade Subteam. Status: Distributed on 9/29/00.
	ACTION ITEM (BELLSOUTH) - CLOSED - CLEC Community will send Change Control any identified requirements for Parsed CSR. Status: Requirements were received from three (3) CLECs. A kick-off conference call was held on 10-3-00 to review and reach consensus on the requirements. A Sub-team meeting was held on 10-19-00.
	ACTION ITEM (BELLSOUTH) - CLOSED - Investigate if reason for system outage can be provided on web notification. Status: The ECS support group has begun providing cause of outage in the web posting of System Outages.
	ACTION ITEM (BELLSOUTH) - CLOSED - Include associated documentation on the CCP Release schedule. Status: CCP has updated the Release Schedule on the CCP Web site to include associated documentation.

BELLSOUTH

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - CLOSED - Provide web location for CCP Release schedule. Status: The CCP Release schedule is located at the following URL: www.interconnection.bellsouth.com Select "Local Exchange Carriers" Select "Change Control Process" Select "Statuses/Release Notification/Proposed Release Schedule"
	ACTION ITEM (BELLSOUTH) - CLOSED - Add the originator to the title column on the CR Log. Status: Change Control has added the originator to the titles of all change requests currently on the CR Log.
	ACTION ITEM (BELLSOUTH) - OPEN - Change the format of the BellSouth Business Rules for Local Ordering (BBR-LO) guide. Status: Discussed at the October Process Improvement meeting and a status will be provided at the follow-up meeting on 11-01
	ACTION ITEM (BELLSOUTH) - CLOSED - Provide CLECs where general information can be found on 319 products. Status: Information on the 319 products can be found at the following URL: www.interconnection.bellsouth.com Select "Local Exchange Carriers" Select "CLEC Products" Select "UNE Products" NOTE: Questions regarding the 319 products should be directed to your Account Team representative.
	ACTION ITEM (BELLSOUTH) - CLOSED - Revisit CR0135 and provide originator status. Status: CR0135 has been placed in Pending Status
	ACTION ITEM (BELLSOUTH) - OPEN - Determine if notification of BST process changes (i e., system downtime, LCSC processes) can be provided 30 days in advance to accommodate internal M&P changes. Status: This issue was discussed at the CCP Process Improvement Meeting on Oct. 17 and an update will be provided at the follow-up meeting on 11/01/00.
	ACTION ITEM (BELLSOUTH) - OPEN - Investigate the cost for additional software needed to support the search/sort capability for CCP web site. Status: The CCP web site is currently being re-designed and search capability will be added upon completion in November

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - OPEN - Coding changes - 30 days not sufficient time for CLECs to make coding changes, need the business rules sooner 30 days is sufficient for M&P changes only Depends on the size of release as to amount of advance notice needed. Status: This was discussed at the October Process Improvement meeting and is still under discussion An update will be provided at the 11/01 meeting
	ACTION ITEM (BELLSOUTH) - OPEN - CR0016 - SI Enhancement - Association with 319 products. Why are 319 products targeted for late 2001? Status: BellSouth Release management is working with IT to possibly implement sooner
	ACTION ITEM (BELLSOUTH) - OPEN - CR0002 - Pre-order/Order Field Discrepancies BST pursuing the possibility of implementing this change in Release 9 0 Status: BST is continuing to pursue getting this request into Release 9.0.
4. NEW CHANGE REQUESTS (TYPES 2-5)	CRD030200-001 - UNE via ASR21 (AT&T and Worldcom) Status: AT&T and Worldcom advised to leave this CR open
	CR0012 - TAFI Functionality via ECTA Interface (AT&T) Status: AT&T advised to leave this CR open for further discussions with BellSouth
	CR0061 - Add LENS 6.3 Tutorial (Trivergent) Status: Originator advised to place this CR on hold until they have an opportunity to review the new web-based LENS course.
	CR0082 - Electronic Change Notifications (Sprint) Status: Being reviewed for acceptance. Sprint will follow-up with CCP.
	CR0095 - ECTA - Attribute Validation (BST) Status: CLECs have indicated no interest in this request, therefore BST will cancel.
	CR0100 - TAG is failing to accurately calculate due date on deny/restore (BST) Status: A feature will be opened and targeted for a future release.
	CR0101 - Drop the RES ID to Requirement for xDSL Order (Nightfire) Status: BST response provided to originator on 8/14/00 for review A conference call will be scheduled with originator after 10-30-00 to discuss further.
	CR0110 - LESOG not populating ZNEA & ZNHC on ACT of N or C (BST) Status: This has been canceled by the originator since there is no CLEC impact.

Agenda Items	Discussion
	CR0130 - LESOG not responding to "C" order adding line & feature on Resale Accounts (BST) Status: 8-22-00 Re-classified as a feature
	CR0132 - Fielded Completion Notifications (Worldcom) Status: Being reviewed for acceptance BST will provide a response by 10-31
	CR0145 - Notification MDR (Mechanized Disaster Reports) (Verizon) Status: Waiting on internal response per clarification request.
	CR0151 - Need to handle HTG USOCs for all calling plans on Port/Loop Combos (BST) Status: Determined to be a feature and will be targeted for a future release.
	CR0158 - Already Pending error message on LSRs where order is being held to not auto clarify (BST) Status: Determined to be a feature and will be targeted for a future release
	CR0166 - Cable ID Defect (AT&T) Status: Determined to not be a defect, but a feature will be opened and will be targeted for a future release AT&T has escalated the validation and BST is re-investigating the validation
	CR0124 - Modify CCP document (AT&T) Status: BellSouth recommended at 10-17 CCP Process Improvements meeting that CLECs meet and reach consensus on what changes the CLEC community would like to see made Also, the Change Request needs to be divided into sections for discussion/voting purposes Jill (AT&T) has coordinated a meeting for 10-27 with CLECs and BST to discuss further.
	CR0174 - Allow PIC/LPIC to be submitted as "No change" in LENS & TAG (Network One) Status: This request is 'Pending Clarification'
	CR0177 - Support Value = D for response type request (RTR) TAG (Sprint) Status: This request is 'Pending Clarification'.
	CR0178 - Provide solicitated notifications in TAG (BST) Status: Being reviewed for acceptance.
	CR0179 - TAG Navigator to CORBA Bridge (NCB) Router (BST) Status: Being reviewed for acceptance
	CR0180 - API Reference Guide recommendations for CLEC Notif Server and Listener (BST) Status: Being reviewed for acceptance

Agenda Items	Discussion
	CR0[illegible] - Add Grid values for disconnect number field in TAG for all svcs. (BST) Status: Being reviewed for acceptance
	CR0182 - TAG needs to display the "TTRA" in the unfielded IDENT section for Number pooling (BST) Status: Being reviewed for acceptance
	CR0185 - LENS ability to view resold CSR's (XO-BST) Status: Being reviewed for acceptance
	CR0186 - Interactive Agent TCIP/SSL3 (WorldCom) Status: Being reviewed for acceptance.
	CR0[illegible] - Allow changes in directory deliveries - LENS99 (BST) Status: Being reviewed for acceptance.
	CR0192 - Increase transaction size limit (AT&T) Status: Being reviewed for acceptance.
	CR0201 - Extension of the retirement of TAG 3.1.1.1 (Mantiss/Access One) Status: Being reviewed for acceptance.
	CR0202 - Extension of TAG 3.1.1.1 Sunset Date (ITC/Deltacom) Status: Originator to cancel. Duplicate request to CR0201
5. PENDING CHANGE REQUESTS	The following change requests were prioritized at the September 27, 2000 Change Review Meeting and are currently being assessed for impact, sizing and estimating activities The results will be discussed at our Release 10.0 Package Meeting The requests will be in "Candidate Request (RC) " status:
	CR00[illegible] - LENS - View multiple CSRs simultaneously (Trivergent)
	CR0093 - Change Listing account in LENS (Alltel)
	CR0[illegible] - CLEC Ordering Guide not up to date with LSOG 4 (Adelphia) (Documentation only)
	CR0083 - Web-based LSR (BST)
	CR0094 - LENS Enhancement - Add new listings (Alltel)
	CR0110 - EDI Pre-ordering (Nightfire)
	CR0[illegible] - LENS large account inquiry (Marietta-Fibernet)
	CR0115 - LENS Inquiry - View Customer record (Southern Telecom)
	CR0120 - Provide pending service order for CSR via TAG (ITC/Deltacom)
	CR0131 - Split Billing Requests (BST) (Manual Environment only)

Agenda Items	Discussion
	CR0135 - Flowthrough change request - REQTYP CB, ACT P&Q for LNP Orders (AT&T)
	CR0139 - Update API guide to better relate the Guide to the BellSouth pre-order (BST) (Documentation only)
	CR0140 - Modify and resend FOC's and clarifications (BST)
	CR0138 - Flowthrough change request - REQTYP BB, ACT P&Q for Loop with LNP (AT&T)
	The following change requests are in "Pending" status:
	TAG081299000 - Parsed CSR via TAG Pre-order (AT&T) Status: Sub Team met on 10-19 to review CLEC requirements. BST in process of addressing action items from meeting Target date to provide the Sub Team updated CLEC requirements and responses to action items is by 11/3/00.
	CR0135 - Merging of Accounts (AT&T)
	CR0142 - Add LSR Codes in LENS (BST)
	CR0143 - Remove a TN from a LENS LSR (BST)
	CR0146 - Default the listed TN (BST)
	CR0151 - Error Code Defect-LNP (AT&T)
	CR0147 - Electronic payphone service orders (BST)
6. SCHEDULED CHANGE REQUESTS	Cheryl Storey (BST) stated that Release 10 0 originally targeted for 05-31-01 has been moved to 06-30-01due to the overall work efforts of this Release requiring additional time. Tyra Hush (Worldcom) expressed concern that Releases continue to be moved out and would expect BST to be adding more CLEC prioritized requests in these releases due to the date changes. The following Change Requests are scheduled for upcoming releases:
	EDI081299000 - The ability to use form for dir listing that drops from 411/DA (AT&T & Worldcom) Status: Documented process and standard form reviewed during today's meeting Electronic process for submitting the form is being investigated.
	EDI081299001 - Allow LSR to be submitted to change the main account number on a listings only account "J" REQTYP (AT&T). Status: Targeted for Release 10 0 on 6/30/01
	EDI081299000 - Jointly assist BST in the development of fields to support the handling of remaining lines when the main account is migrating (AT&T) Status: Targeted for Release 10 0 on 6/30/01.

Agenda Items	Discussion
	EDI081299007 - Restrictions on LEAN/LEATN be lifted in order for complex services with different classes of service (AT&T) Status: Targeted for Release 10 0 on 6/30/01.
	TAG081299001 - Provide CFA & NC/NCI codes on Pre-order via TAG (AT&T) Status: Jill (AT&T) advised to remove the "NC/NCI codes" part of request Targeted for Release 10 0 on 6/30/01
	EDI121599001 - BST validate an address using the TN vs RSAG (AT&T) Status: Targeted for Release 9 0 on 01/06/01. NOTE: CR0133 - Migration of UNE-P Notification has been combined with this request.
	EDI020900001 - Electronically Order Routing to OS/DA (AT&T) Status: This CR removed from Release 8 0 scope BST is in the process of finalizing the Originating Line Number Screening (OLNS) database that will provide this service in a more efficient manner Conference call held 10-16-00 with CLEC community Change Control to provide additional details Jay Bradbury (AT&T) stated that he did not agree with the removal of this original OS/DA request from Release 8 0 and is "officially" requesting that the original request be re-instated and targeted for Release 8 0 Tyra Hush (Worldcom) agreed that BST was pre-mature in removing this item even though the new approach was followed (Action item noted)
	EDI030300001 - BST Test Environment for EDI (AT&T) Status: Targeted for Release 8.1 on 12/9/00. A meeting is scheduled fo 10/31/00 to review the user requirements
	CR0002 - Pre-order/Order business rules discrepancies (AT&T) Status: Targeted for Release 10 0 on 6/30/01
	CR0003 - RPON Business Rules and Error messages (AT&T) Status: Targeted for Release 9 0 on 01/06/01 (Electronic reject & flow through)
	CR0014 - LENS changes and updating Reference Guides (Trivergent) Status: Scheduled for Release 8.0 on 11/18/00
	CR0015 - LENS - ACT of C - Change basic class of service (BST) Status: Scheduled for Release 8.0 on 11/18/00.
	CR0017 - Service inquiry enhancements - SL1, SL2, DS0, DS1, ISDN (AT&T) Status: Targeted for Release 10 0 on 6/30/01
	CR0022 - Partial migration of UNE loops (REQTYP A) (BST) Status: Targeted for Release 10 0 on 6/30/01

Agenda Items	Discussion
	CR0030 – UNE to UNE migrations (BST) Status: Targeted for Release 9.0 on 01/06/01.
	CR0035 – TOS Field on LSR – REQTYP J (TCIF 9) (BST) Status: Targeted for Release 10.0 on 6/30/01.
	CR0041 – Order Tracking Request (AT&T) Status: Targeted for Release 10.0 on 6/30/01
	CR0045 – LENS 6.3 not stripping non-resellable USOCs (One Point) Status: Scheduled for Release 8.0 on 11/18/00
	CR0057 – TN Reservation changed to 45 days (BST) Status: Targeted for 4Q00 implementation
	CR0058 – Pipe Cross USOC (AT&T) Status: Targeted for LNP Release 5.4 on 12/10/00
	CR0074 – Extended Loops (AT&T) Status: Targeted for implementation late 2001.
	CR0076 – Add DFDT to the FOC Status: Targeted for LNP Release 5 4 on 12/10/00.
	CR0106 – Conservation Rules for number pooling (BST) Status: Targeted for Release 9 0 on 01/06/01 and 01/20/01
	CR0192 – TAG hardware/software upgrade to UNIX 11.0 platform. Status: Scheduled for Release 8.0 on 11/18/00
	CR0201 – LESOG should allow manual handling instead of auto clarify (BST) Status: Scheduled for Release 8 0 on 11/18/00
	CR0207 – LESOG not processing REQTYP JB ACT-A on TCIF 7Correctly (BST) Status: Scheduled for Release 8 0 on 11/18/00.
7. IMPLEMENTED CHANGE REQUESTS	The following change requests have been implemented:
	CR0103 – GA 912/229/478 NPA Split (BST) – Release 7.2 on 10/14/00.
	CR0114 – Conversion AS-IS ACT W Defect (Southern Telecom) – Release 7 1 on 9/30/00.
	CR0115 – Partial Pre-Order Query DDC (BST) – Release 7.1 on 9/30/00.
	CR0116 – Premise Visit Indicator (BST) – Release 7.1 on 9/30/00

Agenda Items	Discussion
	CR010 - Update Issue 7 Map Due Date Calculation tables w/information from BST products & services interval guide (BST) - TAG Release 2.2 0 11 on 9/21/00.
	CR011 - Remove Housenumprefix for TAG API 2.2.0.10 (BST) - Release 7.1 on 9/30/00.
	CR012 - LESOG failing to apply ZRTI to orders (BST) - Release 7.1 on 9/30/00.
	CR013 - TN Reservation display of switch CLLI (AT&T) - CLLI verbiage added to the "Helpful Hints" section of the BellSouth Pre-ordering Business Rules - posted 10/10/00
	CR0142 - Remove the business reference for RCFRE, RCFRF, RCFRG, & RCFRN in the RCF matrix of the LEO IG (BST) - Implemented 9/29/00
	CR0147 - Seasonal Suspend - Release 7.0 on 8/12/00
	CR0151 - Add NPT Data Element to the ESDQ Query (BST) - TAG Release 7.1.2.1 on 10/20/00
	CR015- - Electronic Ordering of CO Based Line Sharing (BST) - Release 7 1 on 9/30/00
	CR0159 - Discrepancies in BBR-LO Version 9G (BST) - Version 9H posted on 9/29/00.
	CR016- - LESOG should not bring over FIDS on line USOCs for LNA of G (BST) - Release 7.2 on 10/14/00.
	CR0167 - Incorrect Circuit # on FOC (AT&T) - Release 7.2A on 10/21/00.
	CR018- - LESOG should recognize Street directional for correct validation (BST) - Release 7 2 on 10/14/00.
	CR0168 - Release 7.1 Caused Defects (AT&T) - Corrected 10/6/00
	CR0191 - Suppress the premise visit indicator (BST) - TAG Release on 10/9/00
	CR0206 - Listing Order Defect (AT&T) - Release 7.2A on 10/21/00
8. CANCELED CHANGE REQUESTS	DRD032700001 - Post - FOC Clarification (AT&T)
	CR0050 - DENS 6.4 "of directories for white & yellow pages (BST)
	CR005- - Invalid SUP, Subscription Version Defect (AT&T)
	CR0070 - Call Forwarding USOC Defect - (AT&T)
	CR0082 - "C" order process for UNE-P (Sprint)
	CR0101 - Discrepancies in BellSouth Guidelines - CG-LSOR-002 (Nextlink)
	CR0139 - Migration of UNE-P Notifications (Worldcom)
	CR015- - Ringmaster Defect (AT&T)

Agenda Items	Discussion
	CR0175 – New tables to BBR-LO referencing applicability to various TAG Releases (Albion Connect)
	CR0176 – Change Control Log application and release number reference (Albion Connect)
	CR0178 – TAG CLEC Test Environment – Application Support (Albion Connect)
	CR0185 – TAG/COG Lead Project Mgr Role Change (Albion Connect)
9. DEFECT/EXPEDITE CHANGE REQUESTS	Jay Bradbury (AT&T) and Tyra Hush (Worldcom) expressed major concerns with the length of time that several defects have been validated and targeted for a "future release" and still appear on the Change Control Log Steve Hancock (BST) explained that although every attempt is made to work defects as quickly as possible, only those defects that are "High Impact" are worked within the documented 4-25 day, best effort. As the CCP documentation states, "Validated High Impact defects will be implemented with a 4-25 business day range, best effort" Jay Bradbury (AT&T) asked BST to add the "Impact" levels to all defects that appear on the Change Control Log (Action item noted)
	CR0038 – YPQTY-WPQTY (Iss7) Req Type – E Reject Code must be 2 numerics – (Deltacom) Status: Open – Currently under appeal. Deltacom to provide an update.
	CR0025 – OSS'99 Ordering Guidelines (AT&T) Status: Canceled by AT&T on 10/23/00
	CR0028 – Hunt Group Defect on a Separate CSR (Adelphia) Status: Open – Validated as a defect to be targeted for a future release.
	CR0047 – LENS TNs for each PON on bulk order (AT&T) Status: Pending clarification
	CR0052 – LEO should pull ported number & return on FOC/CN (BST) Status: Determined to be a defect and will be corrected in a future release
	CR0062 – 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
	CR0073 – TAG is requiring "INIT" (BST) Status: Determined to not be a defect. Originator has appealed validation
	CR0080 – LESOG is failing to issue Port Loop combo accurately (BST) Status: Determined to be a defect and will be targeted for a future release.

Agenda Items	Discussion
	CR0082 - LEO is failing to edit for LOCQTY (BST) Status: BST requested further clarification from originator.
	CR0091 - Re-Calculate due date intervals (BST) Status: Determined to not be a defect Waiting on originator to authorize closure.
	CR0092 - Order MA'd and service order info deleted (BST) Status: Determined to not be a defect, however the decision is being made as to whether this will become a feature
	CR0103 - Listings over the number of 2 are not shown on LSR or order (BST) Status: Determined to be a defect and is targeted for a future release.
	CR0126 - LESOG should pull the correct CNF number for enhanced MMC (BST) Status: Determined to be a defect and is targeted for a future release
	CR0136 - Address validating in LENS but not in TAG on old RSAG history (BST) Status: Determined to be a defect and is targeted for a future release.
	CR0148 - LESOG not recognizing disposition of additional/foreign listing (BST) Status: Determined to be a defect and is targeted for a future release
	CR0153 - Missing Completion Notices Defect (AT&T) Status: BST validated that the completion notices did not go back to AT&T because they were manually archived by a Svc. Rep AT&T appealed BST's response BST has re-validated that this is a training issue and will be covering their svc Reps regarding archiving LSR's BST will also explore a mechanized way to restrict this mechanically from happening
	CR0156 - Connect:Direct Request (AT&T) Status: Open - BST recommended to AT&T to submit this request due to problem encountered in testing. System changes have been made and AT&T is validating if the changes have corrected the problems
	CR0162 - OTN Defect Issue 7 (ITC/Deltacom) Status: Determined to be a defect and will be targeted for a future release.
	CR0165 - Discrepancies in BellSouth Guidelines - CGT=LEO0-009-LNUM field on Loop (BST) Status: Reclassified from a feature to a documentation defect. Will be corrected in the next issue of the BBR-LO

Agenda Items	Discussion
	CR0190 – RSAG Address vs. CSR Address (ITC/Deltacom) Status: Determined to not be a defect. Waiting on originator to authorize closure
	CR0192 – Pre-order/Firm Order Data element inconsistencies for TCIF9 (Albion-Connect) Status: Determined to not be a defect BST Business Rules for Local Ordering (BBR-LO) currently reflects the correct data characteristics for EU-Room (15 A/N)
	CR0197 – Missing interval guide for port/loop combos (AT&T) Status: Determined that this is a documentation defect and will be corrected in the next issue of the Interval Guide targeted for 12/00
	CR0202 – Sup to Cancel Defect Request (AT&T) Status: Determined to not be a defect AT&T is asking for further clarification.
	CR0205 – Listing Order Defect (AT&T) Status: Determined to be a defect and was corrected in Release 7 2A on 10/21/00.
	CR0206 – LNP Qualifier Defect (AT&T) Status: Determined to not be a defect. LNP is sending the DLORD as per the OSS'99 LNP FOC requirements AT&T has asked for further clarification.
10. REPORT OF SYSTEM OUTAGES NOTE: Details of each outage are posted on the Change Control website at www.interconnection.bellsouth.com	The following Type 1 System outages have occurred since the last Status Meeting: LENS – 10 EDI – 1 TAG – 3 CSOTS – 0 EC-TA – 1
11. RELEASE MANAGEMENT STATUS	The CLECs suggested that there needs to be a clearer way of correlating Releases with documentation. In addition, there remains concern with the timeframes associated with these documents. A suggestion was made that BST should make their documentation version mirror the Release number that it is representing BST responded that documentation versions are marked according to the platform that they support (i e , Version 9G would equate to TCIF 9 platform) Tyra Hush (Worldcom) will provide a copy of a Release Package that she has received from another ILEC for BST to review for content. The following release management status was provided:

Agenda Items	Discussion
	LNP Release 5.3 is targeted for 11/12/00: • Ability for BellSouth to send CLECs the RESID field on 855/865 transaction/Firm Order Confirmation (FOC) for Issue 9 (associated with XDSL functionality that was implemented with Release 7.0) • Charges associated with Service Level 1 (SL1) Non Designed Loops when more than one loop is requested per LSR for Issue 7 and 9. The charges will apply to all additional loops ordered, excluding the first loop on the LSR (Notification only) Carrier Notification Letter SN91081991 posted to the BellSouth Interconnection Web site on 10-6-00
	Jay Bradbury (AT&T) asked Change Control to add the Change Request numbers that initiated the changes that are resulting in the LNP Release 5 3 (Action item noted)
	Release 8.0 (TAG 7.5) is scheduled for 11/18/00: • CR0045 - Strip Non-Resellable USOCs (EMP1S and EMP1X) • CR0015 - ACT of C - Change Basic Class of Service in LENS • CR0014 - Change Verbiage on LENS Screen to read "Number of Features to Add/Change/Delete" vs "Number of Features to Add" • CR0193 - TAG Hardware/Software Upgrade to UNIX 11 0 Platform - TAG 7 5 (Issue 9) • OSS99 - TAG DID (REQTYP N) • CR0203 - LESOG should allow manual handling instead of auto clarify • CR0204-LESOG not processing REQTYP JB/ACT=A correctly (TCIF7) User Requirements distributed 10-5-00 User Requirements reviewed with CLEC community 10-12-00 Carrier Notification Letter SN91082004 posted 10-17-00 to the BellSouth Web site No business rule changes are related to Release 8 0 The DID business rules are in the current BBR-LO guide. TAG - Release code, final Release Notes and updated API Reference Guide to be posted to the BellSouth Web site on 11-18-00.
	Release 8.1 is targeted for 12/09/00: • EDI030300_001 - CLEC Test Environment Meeting scheduled for 10/31/00 to review requirements with CLEC community.

Agenda Items	Discussion
	LNP Release 5.4 is targeted for 12/10/00: • CR0068 – Pipe Cross USOC • CR0091 – Add DFDT to the FOC
	Release 9.0 is targeted for 01/06/01 (LNP Release - Number Pooling 01/07/01): • CR0169 – Number Pooling Mandate – Florida Only • CR0030 – UNE to UNE Migrations • EDI0812990003 – 411 Drops • CR0003 – RPON Electronic Reject & Flow Through • EDI1215990001 – TN vs RSAG Validation
	Release 9.0 is targeted for 01/20/01: • CR0169 – Number Pooling Mandate – All other states
	Release 10.0 is targeted for 6/30/01 (date changed from 05/31/01): • CR0002 – Pre-Order/Order Business Rule Discrepancies • TAG0812990001 – Provide CFA via Pre-Order • EDI0812990005 – Handling of Remaining Service • EDI0812990004 – Change Main Account Number • EDI0812990007 – Use of LEAN/LEATN Fields • CR0016 – SI Enhancement for SL1, SL2, DS0, DS1 and ISDN • CR0029 – Partial Migration of UNE Loops • CR0038 – TOS Field on ReqTyp J • CR0040 – Order Tracking Request
12. UPCOMING MEETINGS	• The CCP Process Improvement Meeting (follow-up) is November 1, 2000 at the Crown/Ravinia Hotel in Atlanta – 9:00 AM EST – Noon – Oakwood Room. A conference bridge will be provided. The bridge number is 205-969-4213 Access Code 6541 • November 15 is the next Monthly Status Meeting. 10:30 – 12:30 AM Eastern. Conference bridge is 205-970-3741 access code 4736. • December 13 – Monthly Status Meeting 10:30 – 12:30 AM EST. Conference bridge is 205-970-3741 access code 4736

Agenda Items	Discussion
13. ISSUES - CHANGE CONTROL PROCESS	• Letter of Authorization (LOA) for Service Provider Participation Change Control explained that they will be issuing a Change Request to update the Change Control User Registration Form to include a section to identify whether a participant is a CLEC or a Service Provider • Updates to Maintenance Interfaces Gene Piatkowski (BST) provided an overview of three items that BellSouth will be implementing in the near future regarding maintenance: 1. BST has developed new functionality in TAFI to allow trouble reports to be entered by DLECS using line sharing methodology. This is currently documented in the CLEC TAFI User's Guide - Issue 5, Section 14 2 BST is developing a GUI interface, built for IXCs and broadening the scope of users to include CLECs This interface would be a man-to-machine interface and would be used to enter troubles - CPSS-TA. Currently, this interface is in the "pilot" stage and more details will be provided to the CLEC's as they materialize Target implementation - End of 2000 3. BST is developing a future interface called E-Repair Release I is in the final development stage and will allow large business customers to view "statuses only" of their trouble tickets This interface is designed for the Retail community CLECs will also be able to utilize this interface to check statuses of trouble reports BST will "pilot" this interface in Jan, 2001 Functionality will be expanded over time

Agenda Items	Discussion
14. 411 DROPS - STANDARD FORM	BST explained how the 411 drops Multiple-Listings Log (Standard Form) is to provide a standard process for Local Service Providers to use to report multiple listings dropped from BellSouth's Directory Assistance Database, if they do not wish to call the LCSC. BST also explained that this log would not be used to resolve listing disputes/issues from BAPCO Review Pages, Contracted Advertising or Published Directory Jay Bradbury (AT&T) expressed his concern that the way the form is currently designed, requiring the CLEC to "gain concurrence to submit the log to the LCSC" would become burdensome for the CLECs and BST BST explained that the LCSC would be more than reasonable to work out simple "concurrence" for multiple logs to be submitted without a call into the LCSC each time. The following fields were identified on the "Multiple Listings Log" form: • Fields 1-12 (Required) • Field 13 (only if appropriate) • Field 14 (only if appropriate) BellSouth committed to inform the CLECs through Change Control when the the final "Multiple Listings Log form" will be made available for implementation In addition, BST will inform the CLECs which fields will be required (Action item noted)
15. ACTION ITEMS	ACTION ITEM (BELLSOUTH) - AT&T is requesting that BellSouth reinstate their original change request EDI020900_001 and re-target this request for Release 8 0 (tent. scheduled for 11/18/00)
	ACTION ITEM (BELLSOUTH) - CCP to add the originator to CR0187, CR0188, and CR0191 in the "Implemented" section of the Change Request Log
	ACTION ITEM (BELLSOUTH) - CCP to add the "Impact" levels of all defects that are displayed on the Change Control Log
	ACTION ITEM (BELLSOUTH) - CCP to add the Change Request numbers that initiated the changes that are resulting in the LNP Release 5.3.
	ACTION ITEM (BELLSOUTH) - BellSouth will let the CLECs know through Change Control when the final form used for 411 drops will be available for implementation In addition, BellSouth will inform the CLECs which fields will be required
	ACTION ITEM (BELLSOUTH) - BellSouth will issue a Change Request to add a section to the CCP User Registration Form to identify whether a participant is a CLEC or a Service Provider
	ACTION ITEM (BELLSOUTH) - BellSouth to provide additional information on charges associated with SL1 non-designed Loops - targeted for LNP Release 5 3 on 11/12/00

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - CCP to add Worldcom as a co-originator on EDI12159900_001 (Migration of UNE-P notifications) CR0133 is also combined with this change request
	ACTION ITEM (BELLSOUTH) - CCP to include all rows of information on the Release Management Status report whether applicable for the specific release or not.

BellSouth Telecommunications, Inc.
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Bennett L. Ross
General Counsel - Georgia

770 391 2416
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November 13, 2000

DELIVERED BY HAND

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W., Room 520
Atlanta, Georgia 30334

Re: In the Matter of: Interconnection Agreement Negotiations Between AT&T Communications of the Southern States, Inc., Teleport Communications Atlanta, Inc., and BellSouth Telecommunications, Inc.; Docket No. 11853-U

Dear Ms. O'Leary:

Enclosed herein please find an original and nineteen (19) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Late File Hearing Exhibits for W. Keith Milner in the above-referenced docket. I would appreciate your filing same and returning the four (4) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Very truly yours,

Bennett L. Ross

BLR:nvd
Enclosures

cc: Parties of Record

235572

BellSouth Telecommunications, Inc.
GPSC Docket No. 11853-U
October 31, 2000
Late File Hearing Exhibit No. 1
Page 1 of 1

REQUEST: Please provide an update on the status of whether or not the electronic ordering will be available in the next proposed Encore release or some subsequent release.

Response: Change Request #EDI020900_001 Electronically Order Routing to OS/DA will be included in Release 8.0, which is scheduled to be implemented on November 18, 2000. Once implemented, this electronic ordering capability will automatically identify and generate specified Line Class Codes ("LCC") on behalf of AT&T when AT&T selects the OS/DA unbranded option. Because of the number of operational issues associated with the LCC method of customized routing, other CLECs seeking to avail themselves of this electronic ordering capability must contact their respective account teams.

As BellSouth witness Milner testified at the hearing, an e-mail was sent to CLECs on October 11, 2000 indicating that Change Request #EDI020900_001 Electronically Order Routing to OS/DA had been removed from Release 8.0. Clarification of this issue was subsequently provided to CLECs by e-mail the next day. Copies of both the October 11, 2000 and October 12, 2000 e-mails, which had been requested informally by AT&T, are attached.

October 11, 2000

Attention CLECs,

There has been a change in the scope for Release 8.0. Change Request #EDI020900_001 Electronically Order Routing to OS/DA has been removed from the scope because BellSouth has developed a more efficient method of delivering this service. BellSouth is in the process of finalizing a new database called Originating Line Number Screening (OLNS) that will eliminate the need for CLECs to specify Line Class Codes for selective routing. OLNS will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding services. OLNS is more efficient for the following reasons:

- It is a central database accessible from every Operator Services switch
- It eliminates the need for separate trunk groups

BellSouth is committed to providing the best solution to the CLEC community.

Additional details are forthcoming.

Please let us know if you have questions.

Thanks,

Change Control Team

October 12, 2000

Attention CLECs,

This is in clarification to the email that you received on October 11 regarding Change Request #EDI020900_001 – Electronically Order Routing to OS/DA. CLECs can currently submit a manual OS/DA order to BellSouth using Line Class Codes or by using our AIN Solution. Customized routing can still be ordered manually. Originating Line Number Screening (OLNS) is an addition to this option. We are only removing the Change Request for mechanizing the ordering process from Release 8.0.

Please let us know if you have questions.

Thanks,

Change Control Team

BellSouth Telecommunications, Inc.
GPSC Docket No. 11853-U
October 31, 2000
Late File Hearing Exhibit No. 2
Page 1 of 1

REQUEST: Please provide implementation time frame and cost involved in BellSouth's providing a facilities database check before returning the FOC transmission to a CLEC.

Response: A change request for BellSouth to provide connecting facility assignment (CFA) as part of its pre-order functionality is being provided through BellSouth's Change Control process. This change request was prioritized and scheduled for implementation on June 30, 2001. Since this change request is in a developmental stage, the costs associated with providing this functionality have not yet been determined. In the meantime, BellSouth will continue to work diligently with AT&T to resolve CFA discrepancies. As an interim process, BellSouth will continue providing a download of AT&T's CFA data via a secured website. This download allows AT&T to resolve discrepancies that may exist between AT&T records and BellSouth databases. Discrepancies are submitted to BellSouth for database correction via a spreadsheet to the BellSouth Account Team. The BellSouth Account Team will handle the clearing of any discrepancies through the Local Carrier Service Center.

CERTIFICATE OF SERVICE
Docket No. 11853-U

This is to certify that I have this day served a copy of the within and foregoing, **BellSouth Telecommunications, Inc.'s Late File Hearing Exhibit No. 1 and Exhibit No. 2 for W. Keith Milner**, upon all known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

Jim Hurt, Esquire
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334

Thomas K. Bond, Esquire
Special Assistant Attorney General
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Suzanne W. Ockleberry, Esquire
AT&T – Law & Government Affairs
Suite 8100
1200 Peachtree Street, N.E.
Atlanta, GA 30309-3579

Mr. Jeffrey C. Stair
Hearing Officer
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

This 13th day of November, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

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199149

BELLSOUTH

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Change Control Monthly Status Meeting	Steve Hancock - Change Control Team	10/26/00

Participants

PARTICIPANT	COMPANY
Brenda Files	BST - CCP
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Steve Hancock	BST - CCP
Bill Grant	Telcordia
Brian Rutter	KPMG
Kevin McCall	BST - NCS/CS
John Duffey	FL - PSC
Phyllis Burt	Quintessent
Carolyn Harris	Mpower
Selange Roberts	e spire
Jean John	Quintessent
Kim Gillette	Quintessent
Shamone Stapler	ITC/Deltacom
Stephanie Smith	dset

PARTICIPANT	COMPANY
Sandy Evans	Sprint
Tyra Hush	Worldcom
Steve Murray	Rhythms
James Hunter	KPMG
Bob Mason	KPMG
Peggy Rehm	Nightfire
Anthony Zerillo	Birch Telecom
Michelle Ewton	XO
Marcia Lees	SBC Telecom
Keen Lee	Andersen Consulting/Ztel
Donna Graham	Mantiss
Jay Bradbury	AT&T
Donna Cain	AT&T
Sherian Lively	Trivergent
Gene Piatkowski	BST

Meeting Information History

DATE	START TIME	END TIME
10/25/00	10:30 AM EDT	12 NOON EDT

MEETING PURPOSE / AGENDA

Review status of pending/approved Change Requests (including defects), review current Release Management statuses and discuss Change Control Process.

BELLSOUTH

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
1. 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 – Change Control Process - Letter of Authorization (LOA) for Service Provider Participation - Updates to the Maintenance Interfaces • Summarize Action Items
2. REGULATORY MANDATES	CR0059 – Change TN Reservation Period to 45 days (pre-ordering functionality) FCC Docket #99200 – Order # FCC00-104 *Status*: The deadline for compliance has been extended until December 2000 Target date for implementation is 4Q00. CR0169 – Conservation Rules for Number Pooling. FCC99-200 (revised on 3/31/00 to FCC00-104). Florida 954 – FCC99-249. Florida State PSC docket number is 981-444TP. *Status*: Targeted for Release 9 0 implementation (01/06/01 and 01/20/01)
3. OUTSTANDING ACTION ITEMS	The following outstanding Action Items are noted from the 9-27-00 Change Review/Monthly Status Meeting:
	ACTION ITEM (BELLSOUTH) – CLOSED – Distribute notification to CLEC community regarding October CCP Process Improvement meeting. Status: Distributed 9-28-00
	ACTION ITEM (BELLSOUTH) – OPEN – Provide revision history with Carrier Notification Letters associated with documentation updates Status: This issue was discussed at the CCP Process Improvement Meeting on Oct. 17 and an update will be provided in the follow-up meeting on 11/01/00
	ACTION ITEM (BELLSOUTH) – CLOSED – Have BST SME's available at the Monthly Status Meetings to discuss Carrier Notification Letters distributed thru Change Control. This issue to be addressed at the October Process Improvement meetings. Status: BellSouth will commit to having SME's at the monthly status meetings, CCP requests from the CLECs at least a two (2) weeks notice prior to the scheduled meeting.

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - OPEN - Defect/Expedite Process Status: As a result of the October Process Improvement meeting, BellSouth will commit to identifying a common definition for defects Status will be provided at the follow-up meeting on 11-01. Jay Bradbury (AT&T) questioned whether BST would continue to use the definition documented in the CCP process document. Tyra Hush went on record as stating that Worldcom does not agree with the current definition of "Defects" as documented in the CCP Process document. Valerie Cottingham (BST) reiterated to the CLECs that the "Defect/Expedite" process is still in "draft" mode, and acknowledged that BST still has some internal issues pertaining to the definition of defects This will be addressed at the 11-01 Process Improvement meeting
	ACTION ITEM (BELLSOUTH) - OPEN - BST provide milestones for Release management. Status: Discussed at the October Process Improvement meeting and status will be provided at the follow-up meeting on 11-01
	ACTION ITEM (BELLSOUTH) - CLOSED - Change Control will provide a "soft" copy of Number Pooling presentation. Status: Presentation provided with 9-27-00 meeting minutes.
	ACTION ITEM (BELLSOUTH) - CLOSED - Change Control will distribute notification regarding EDI Infrastructure Upgrade Subteam. Status: Distributed on 9/29/00.
	ACTION ITEM (BELLSOUTH) - CLOSED - CLEC Community will send to Change Control any identified requirements for Parsed CSR. Status: Requirements were received from three (3) CLECs. A kick-off conference call was held on 10-3-00 to review and reach consensus on the requirements. A Sub-team meeting was held on 10-19-00.
	ACTION ITEM (BELLSOUTH) - CLOSED - Investigate if reason for system outage can be provided on web notification. Status: The ECS support group has begun providing cause of outage in the web posting of System 1 outages.
	ACTION ITEM (BELLSOUTH) - CLOSED - Include associated documentation on the CCP Release schedule. Status: CCP has updated the Release Schedule on the CCP Web site to include associated documentation.

BELLSOUTH

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) – CLOSED – Provide web location for CCP Release schedule. Status: The CCP Release schedule is located at the following URL: www.interconnection.bellsouth.com Select "Local Exchange Carriers" Select "Change Control Process" Select "Statuses/Release Notification/Proposed Release Schedule"
	ACTION ITEM (BELLSOUTH) – CLOSED – Add the originator to the title column on the CR Log. Status: Change Control has added the originator to the titles of all change requests currently on the CR Log.
	ACTION ITEM (BELLSOUTH) – OPEN – Change the format of the BellSouth Business Rules for Local Ordering (BBR-LO) guide. Status: Discussed at the October Process Improvement meeting and a status will be provided at the follow-up meeting on 11-01
	ACTION ITEM (BELLSOUTH) – CLOSED – Provide CLECs where general information can be found on 319 products. Status: Information on the 319 products can be found at the following URL: www.interconnection.bellsouth.com Select "Local Exchange Carriers" Select "CLEC Products" Select "UNE Products" NOTE: Questions regarding the 319 products should be directed to your Account Team representative.
	ACTION ITEM (BELLSOUTH) – CLOSED – Revisit CR0135 and provide originator status. Status: CR0135 has been placed in Pending Status.
	ACTION ITEM (BELLSOUTH) – OPEN – Determine if notification of BST process changes (i e., system downtime, LCSC processes) can be provided 30 days in advance to accommodate internal M&P changes. Status: This issue was discussed at the CCP Process Improvement Meeting on Oct. 17 and an update will be provided at the follow-up meeting on 11/01/00.
	ACTION ITEM (BELLSOUTH) – OPEN – Investigate the cost for additional software needed to support the search/sort capability for CCP web site. Status: The CCP web site is currently being re-designed and search capability will be added upon completion in November

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - OPEN - Coding changes - 30 days not sufficient time for CLECs to make coding changes, need the business rules sooner 30 days is sufficient for M&P changes only Depends on the size of release as to amount of advance notice needed. Status: This was discussed at the October Process Improvement meeting and is still under discussion An update will be provided at the 11/01 meeting
	ACTION ITEM (BELLSOUTH) - OPEN - CR0016 - SI Enhancement - Association with 319 products. Why are 319 products targeted for late 2001? Status: BellSouth Release management is working with IT to possibly implement sooner
	ACTION ITEM (BELLSOUTH) - OPEN - CR0002 - Pre-order/Order Field Discrepancies BST pursuing the possibility of implementing this change in Release 9 0 Status: BST is continuing to pursue getting this request into Release 9.0.
4. NEW CHANGE REQUESTS (TYPES 2-5)	CRD030200*001 - UNE via ASR21 (AT&T and Worldcom) Status: AT&T and Worldcom advised to leave this CR open
	CR0012 - TAFI Functionality via ECTA Interface (AT&T) Status: AT&T advised to leave this CR open for further discussions with BellSouth
	CR0063 - Add LENS 6.3 Tutorial (Trivergent) Status: Originator advised to place this CR on hold until they have an opportunity to review the new web-based LENS course.
	CR0093 - Electronic Change Notifications (Sprint) Status: Being reviewed for acceptance. Sprint will follow-up with CCP.
	CR0095 - ECTA - Attribute Validation (BST) Status: CLECs have indicated no interest in this request, therefore BST will cancel.
	CR0100 - TAG is failing to accurately calculate due date on deny/restore (BST) Status: A feature will be opened and targeted for a future release.
	CR0101 - Drop the RES ID to Requirement for xDSL Order (Nightfire) Status: BST response provided to originator on 8/14/00 for review A conference call will be scheduled with originator after 10-30-00 to discuss further.
	CR0110 - LESOG not populating ZNEA & ZNHC on ACT of N or C (BST) Status: This has been canceled by the originator since there is no CLEC impact.

Agenda Items	Discussion
	CR0130 – LESOG not responding to "C" order adding line & feature on Resale Accounts (BST) Status: 8-22-00 Re-classified as a feature
	CR0132 – Fielded Completion Notifications (Worldcom) Status: Being reviewed for acceptance BST will provide a response by 10-31
	CR0145 – Notification MDR (Mechanized Disaster Reports) (Verizon) Status: Waiting on internal response per clarification request.
	CR0134 – Need to handle HTG USOCs for all calling plans on Port/Loop Combos (BST) Status: Determined to be a feature and will be targeted for a future release.
	CR0158 – Already Pending error message on LSRs where order is being held to not auto clarify (BST) Status: Determined to be a feature and will be targeted for a future release
	CR0156 – Cable ID Defect (AT&T) Status: Determined to not be a defect, but a feature will be opened and will be targeted for a future release AT&T has escalated the validation and BST is re-investigating the validation
	CR0124 – Modify CCP document (AT&T) Status: BellSouth recommended at 10-17 CCP Process Improvements meeting that CLECs meet and reach consensus on what changes the CLEC community would like to see made Also, the Change Request needs to be divided into sections for discussion/voting purposes Jill (AT&T) has coordinated a meeting for 10-27 with CLECs and BST to discuss further.
	CR0174 – Allow PIC/LPIC to be submitted as "No change" in LENS & TAG (Network One) Status: This request is 'Pending Clarification'
	CR0127 – Support Value = D for response type request (RTR) TAG (Sprint) Status: This request is 'Pending Clarification'.
	CR0171 – Provide solicitated notifications in TAG (BST) Status: Being reviewed for acceptance.
	CR0178 – TAG Navigator to CORBA Bridge (NCB) Router (BST) Status: Being reviewed for acceptance
	CR0180 – API Reference Guide recommendations for CLEC Notif Server and Listener (BST) Status: Being reviewed for acceptance

Agenda Items	Discussion
	CR0[illegible] – Add Grid values for disconnect number field in TAG for all svcs. (BST) Status: Being reviewed for acceptance
	CR0188 – TAG needs to display the "TTRA" in the unfielded IDENT section for Number pooling (BST) Status: Being reviewed for acceptance
	CR0189 – LENS ability to view resold CSR's (XO-BST) Status: Being reviewed for acceptance
	CR0186 – Interactive Agent TCIP/SSL3 (WorldCom) Status: Being reviewed for acceptance.
	CR0199 – Allow changes in directory deliveries – LENS99 (BST) Status: Being reviewed for acceptance.
	CR0198 – Increase transaction size limit (AT&T) Status: Being reviewed for acceptance.
	CR0201 – Extension of the retirement of TAG 3.1.1.1 (Mantiss/Access One) Status: Being reviewed for acceptance.
	CR0202 – Extension of TAG 3.1.1.1 Sunset Date (ITC/Deltacom) Status: Originator to cancel. Duplicate request to CR0201
5. PENDING CHANGE REQUESTS	The following change requests were prioritized at the September 27, 2000 Change Review Meeting and are currently being assessed for impact, sizing and estimating activities The results will be discussed at our Release 10.0 Package Meeting The requests will be in "Candidate Request (RC) " status:
	CR0[illegible] – LENS – View multiple CSRs simultaneously (Trivergent)
	CR0003 – Change Listing account in LENS (Alltel)
	CR00[illegible] – CLEC Ordering Guide not up to date with LSOG 4 (Adelphia) (Documentation only)
	CR0081 – Web-based LSR (BST)
	CR0092 – LENS Enhancement – Add new listings (Alltel)
	CR0101 – EDI Pre-ordering (Nightfire)
	CR0104 – LENS large account inquiry (Marietta-Fibernet)
	CR0115 – LENS Inquiry – View Customer record (Southern Telecom)
	CR0120 – Provide pending service order for CSR via TAG (ITC/Deltacom)
	CR0131 – Split Billing Requests (BST) (Manual Environment only)

Agenda Items	Discussion
	CR0147 - Flowthrough change request - REQTYP CB, ACT P&Q for LNP Orders (AT&T)
	CR0138 - Update API guide to better relate the Guide to the BellSouth pre-order (BST) (Documentation only)
	CR0144 - Modify and resend FOC's and clarifications (BST)
	CR0148 - Flowthrough change request - REQTYP BB, ACT P&Q for Loop with LNP (AT&T)
	The following change requests are in "Pending" status:
	TAG081299000S - Parsed CSR via TAG Pre-order (AT&T) Status: Sub Team met on 10-19 to review CLEC requirements. BST in process of addressing action items from meeting Target date to provide the Sub Team updated CLEC requirements and responses to action items is by 11/3/00.
	CR0135 - Merging of Accounts (AT&T)
	CR0142 - Add LSR Codes in LENS (BST)
	CR0143 - Remove a TN from a LENS LSR (BST)
	CR0146 - Default the listed TN (BST)
	CR0151 - Error Code Defect-LNP (AT&T)
	CR0145 - Electronic payphone service orders (BST)
6. SCHEDULED CHANGE REQUESTS	Cheryl Storey (BST) stated that Release 10 0 originally targeted for 05-31-01 has been moved to 06-30-01due to the overall work efforts of this Release requiring additional time. Tyra Hush (Worldcom) expressed concern that Releases continue to be moved out and would expect BST to be adding more CLEC prioritized requests in these releases due to the date changes. The following Change Requests are scheduled for upcoming releases:
	EDI081299000 - The ability to use form for dir listing that drops from 411/DA (AT&T & Worldcom) Status: Documented process and standard form reviewed during today's meeting Electronic process for submitting the form is being investigated.
	EDI081299000 - Allow LSR to be submitted to change the main account number on a listings only account "J" REQTYP (AT&T). Status: Targeted for Release 10 0 on 6/30/01
	EDI081299000 - Jointly assist BST in the development of fields to support the handling of remaining lines when the main account is migrating (AT&T) Status: Targeted for Release 10 0 on 6/30/01.

Agenda Items	Discussion
	EDI081299000? - Restrictions on LEAN/LEATN be lifted in order for complex services with different classes of service (AT&T) Status: Targeted for Release 10 0 on 6/30/01.
	TA-081299000? - Provide CFA & NC/NCI codes on Pre-order via TAG (AT&T) Status: Jill (AT&T) advised to remove the "NC/NCI codes" part of request Targeted for Release 10 0 on 6/30/01
	EDI121599000? - BST validate an address using the TN vs RSAG (AT&T) Status: Targeted for Release 9 0 on 01/06/01. NOTE: CR0133 - Migration of UNE-P Notification has been combined with this request.
	EDI020900?001 - Electronically Order Routing to OS/DA (AT&T) Status: This CR removed from Release 8 0 scope BST is in the process of finalizing the Originating Line Number Screening (OLNS) database that will provide this service in a more efficient manner Conference call held 10-16-00 with CLEC community Change Control to provide additional details Jay Bradbury (AT&T) stated that he did not agree with the removal of this original OS/DA request from Release 8 0 and is "officially" requesting that the original request be re-instated and targeted for Release 8 0 Tyra Hush (Worldcom) agreed that BST was pre-mature in removing this item even though the new approach was followed (Action item noted)
	EDI030?00?001 - BST Test Environment for EDI (AT&T) Status: Targeted for Release 8.1 on 12/9/00. A meeting is scheduled fo 10/31/00 to review the user requirements
	CR0002 - Pre-order/Order business rules discrepancies (AT&T) Status: Targeted for Release 10 0 on 6/30/01
	CR0005 - RPON Business Rules and Error messages (AT&T) Status: Targeted for Release 9 0 on 01/06/01 (Electronic reject & flow through)
	CR0015 - LENS changes and updating Reference Guides (Trivergent) Status: Scheduled for Release 8.0 on 11/18/00
	CR0017 - LENS - ACT of C - Change basic class of service (BST) Status: Scheduled for Release 8.0 on 11/18/00.
	CR0018 - Service inquiry enhancements - SL1, SL2, DS0, DS1, ISDN (AT&T) Status: Targeted for Release 10 0 on 6/30/01
	CR0020 - Partial migration of UNE loops (REQTYP A) (BST) Status: Targeted for Release 10 0 on 6/30/01

Agenda Items	Discussion
	CR0030 – UNE to UNE migrations (BST) Status: Targeted for Release 9.0 on 01/06/01.
	CR0035 – TOS Field on LSR – REQTYP J (TCIF 9) (BST) Status: Targeted for Release 10.0 on 6/30/01.
	CR0[illegible] – Order Tracking Request (AT&T) Status: Targeted for Release 10.0 on 6/30/01
	CR0045 – LENS 6.3 not stripping non-resellable USOCs (One Point) Status: Scheduled for Release 8.0 on 11/18/00
	CR0057 – TN Reservation changed to 45 days (BST) Status: Targeted for 4Q00 implementation
	CR0058 – Pipe Cross USOC (AT&T) Status: Targeted for LNP Release 5.4 on 12/10/00
	CR00[illegible] – Extended Loops (AT&T) Status: Targeted for implementation late 2001.
	CR0067 – Add DFDT to the FOC Status: Targeted for LNP Release 5 4 on 12/10/00.
	CR0[illegible] – Conservation Rules for number pooling (BST) Status: Targeted for Release 9 0 on 01/06/01 and 01/20/01
	CR0192 – TAG hardware/software upgrade to UNIX 11.0 platform. Status: Scheduled for Release 8.0 on 11/18/00
	CR0[illegible] – LESOG should allow manual handling instead of auto clarify (BST) Status: Scheduled for Release 8 0 on 11/18/00
	CR0[illegible] – LESOG not processing REQTYP JB ACT-A on TCIF 7Correctly (BST) Status: Scheduled for Release 8 0 on 11/18/00.
7. IMPLEMENTED CHANGE REQUESTS	The following change requests have been implemented:
	CR0[illegible] – GA 912/229/478 NPA Split (BST) – Release 7.2 on 10/14/00.
	CR0[illegible] – Conversion AS-IS ACT W Defect (Southern Telecom) – Release 7 1 on 9/30/00.
	CR0[illegible] – Partial Pre-Order Query DDC (BST) – Release 7.1 on 9/30/00.
	CR0[illegible] – Premise Visit Indicator (BST) – Release 7.1 on 9/30/00

Agenda Items	Discussion
	CR0[redacted] – Update Issue 7 Map Due Date Calculation tables w/information from BST products & services interval guide (BST) – TAG Release 2.2 0 11 on 9/21/00.
	CR0[redacted] – Remove Housenumprefix for TAG API 2.2.0.10 (BST) – Release 7.1 on 9/30/00.
	CR0[redacted] – LESOG failing to apply ZRTI to orders (BST) – Release 7.1 on 9/30/00.
	CR0[redacted] – TN Reservation display of switch CLLI (AT&T) – CLLI verbiage added to the "Helpful Hints" section of the BellSouth Pre-ordering Business Rules – posted 10/10/00
	CR0[redacted] – Remove the business reference for RCFRE, RCFRF, RCFRG, & RCFRN in the RCF matrix of the LEO IG (BST) – Implemented 9/29/00
	CR0[redacted] – Seasonal Suspend – Release 7.0 on 8/12/00
	CR0[redacted] – Add NPT Data Element to the ESDQ Query (BST) – TAG Release 7.1 2.1 on 10/20/00
	CR0[redacted] – Electronic Ordering of CO Based Line Sharing (BST) – Release 7 1 on 9/30/00
	CR0[redacted] – Discrepancies in BBR-LO Version 9G (BST) – Version 9H posted on 9/29/00.
	CR0[redacted] – LESOG should not bring over FIDS on line USOCs for LNA of G (BST) – Release 7.2 on 10/14/00.
	CR0[redacted] – Incorrect Circuit # on FOC (AT&T) – Release 7.2A on 10/21/00.
	CR0[redacted] – LESOG should recognize Street directional for correct validation (BST) – Release 7 2 on 10/14/00.
	CR0[redacted] – Release 7.1 Caused Defects (AT&T) – Corrected 10/6/00
	CR0[redacted] – Suppress the premise visit indicator (BST) – TAG Release on 10/9/00
	CR0[redacted] – Listing Order Defect (AT&T) – Release 7.2A on 10/21/00
8. CANCELED CHANGE REQUESTS	ORD032700[redacted] – Post – FOC Clarification (AT&T)
	CR1050 – [redacted]
	CR0056 – Invalid SUP, Subscription Version Defect (AT&T)
	CR0020 – Call Forwarding USOC Defect – (AT&T)
	CR0081 – "C" order process for UNE-P (Sprint)
	CR0121 – Discrepancies in BellSouth Guidelines – CG-LSOR-002 (Nextlink)
	CR0[redacted] – Migration of UNE-P Notifications (Worldcom)
	CR0155 – Ringmaster Defect (AT&T)

Agenda Items	Discussion
	CR0117A – New tables to BBR-LO referencing applicability to various TAG Releases (Albion Connect)
	CR0174 – Change Control Log application and release number reference (Albion Connect)
	CR0175 – TAG CLEC Test Environment – Application Support (Albion Connect)
	CR0185 – TAG/COG Lead Project Mgr Role Change (Albion Connect)
9. DEFECT/EXPEDITE CHANGE REQUESTS	Jay Bradbury (AT&T) and Tyra Hush (Worldcom) expressed major concerns with the length of time that several defects have been validated and targeted for a "future release" and still appear on the Change Control Log Steve Hancock (BST) explained that although every attempt is made to work defects as quickly as possible, only those defects that are "High Impact" are worked within the documented 4-25 day, best effort. As the CCP documentation states, "Validated High Impact defects will be implemented with a 4-25 business day range, best effort" Jay Bradbury (AT&T) asked BST to add the "Impact" levels to all defects that appear on the Change Control Log (Action item noted)
	CR0038 – YPQTY-WPQTY (Iss7) Req Type – E Reject Code must be 2 numerics – (Deltacom) Status: Open – Currently under appeal. Deltacom to provide an update.
	CR0029 – OSS'99 Ordering Guidelines (AT&T) Status: Canceled by AT&T on 10/23/00
	CR0052 – Hunt Group Defect on a Separate CSR (Adelphia) Status: Open – Validated as a defect to be targeted for a future release.
	CR0049 – LENS TNs for each PON on bulk order (AT&T) Status: Pending clarification
	CR0057 – LEO should pull ported number & return on FOC/CN (BST) Status: Determined to be a defect and will be corrected in a future release
	CR0064 – 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
	CR0067 – TAG is requiring "INIT" (BST) Status: Determined to not be a defect. Originator has appealed validation
	CR0080 – LESOG is failing to issue Port Loop combo accurately (BST) Status: Determined to be a defect and will be targeted for a future release.

Agenda Items	Discussion
	CR0082 - LEO is failing to edit for LOCQTY (BST) Status: BST requested further clarification from originator.
	CR0098 - Re-Calculate due date intervals (BST) Status: Determined to not be a defect Waiting on originator to authorize closure.
	CR0092 - Order MA'd and service order info deleted (BST) Status: Determined to not be a defect, however the decision is being made as to whether this will become a feature
	CR0104 - Listings over the number of 2 are not shown on LSR or order (BST) Status: Determined to be a defect and is targeted for a future release.
	CR0125 - LESOG should pull the correct CNF number for enhanced MMC (BST) Status: Determined to be a defect and is targeted for a future release
	CR0136 - Address validating in LENS but not in TAG on old RSAG history (BST) Status: Determined to be a defect and is targeted for a future release.
	CR0148 - LESOG not recognizing disposition of additional/foreign listing (BST) Status: Determined to be a defect and is targeted for a future release
	CR0154 - Missing Completion Notices Defect (AT&T) Status: BST validated that the completion notices did not go back to AT&T because they were manually archived by a Svc. Rep AT&T appealed BST's response BST has re-validated that this is a training issue and will be covering their svc Reps regarding archiving LSR's BST will also explore a mechanized way to restrict this mechanically from happening
	CR0156 - Connect:Direct Request (AT&T) Status: Open - BST recommended to AT&T to submit this request due to problem encountered in testing. System changes have been made and AT&T is validating if the changes have corrected the problems
	CR0162 - OTN Defect Issue 7 (ITC/Deltacom) Status: Determined to be a defect and will be targeted for a future release.
	CR0165 - Discrepancies in BellSouth Guidelines - CGT=LEO0-009-LNUM field on Loop (BST) Status: Reclassified from a feature to a documentation defect. Will be corrected in the next issue of the BBR-LO

> -----Original Message-----
> From: Williamson, Jill R, NCAM
> Sent: Tuesday, November 28, 2000 2:10 PM
> To: 'Cheryl Richardson'; 'Ranae Stewart'
> Cc: 'Sandra C Jones'
> Subject: GA1000 OS/DA Test using Line Class Codes (LCCs)
> Importance: High
>
> Cheryl and Ranae,
>
> We have reviewed the OS/DA requirements provided by BellSouth to "Generate specified LCC if RESH/AECN present and OCN equals AT&T" In trying to understand the application of BellSouth's requirements against our test cases, we've found that the routing of OS/DA calls to an unbranded platform cannot be accomplished on any of the 800 existing accounts

> BellSouth made unbranded OS/DA available in a group of NPA/NXXs restricted to the ATLNGAPP34A wire center (DMS100 switch) All of the accounts established for our GA1000 Trial were provisioned out of the ATLNGAPPDS2 wire center (5ESS switch) At this point, we are only able to test the routing of unbranded OS/DA on orders for new service/additional lines
>
> I'd like to understand why BellSouth provisioned the switch in which none of the GA1000 lines were established and whether or not BellSouth can add the 5ESS switch to the requirements for the GA1000 Trial Please provide me with a response no later than Friday, December 1, 2000
>
> Sincerely,
>
> Jill Williamson

-----Original Message-----
From: jrwilliamson@att com [mailto:jrwilliamson@att com]
Sent: Wednesday, November 29, 2000 1:11 PM
To: edwardgibbs@att com; crafton@att com; sharonnorris@att com;
bradbury@att com; eppsteiner@att com; jmperry@att com; mkamal@att com;
bettybarrett@att com; gpterry@att com; mrule@att com;
follensbee@att com; sockleberry@att com; vctate@att com
Subject: RE: GA1000 OS/DA Test using Line Class Codes (LCCs)

Edward,

I just received some new information about what happened with the setup of OS/DA for the GA1000 Trial BellSouth loaded our LCCs in the correct switch (5ESS), but built the logic for the lookup table using the NPA/NXXs from the incorrect switch (DMS100) They are looking into updating the requirements to include the NPA/NXXs for the 5E, but I don't know when or if they'll make the correction

Because the LCCs are only loaded in the 5E switch, we will not be able to even test new orders out of the DMS100 switch I hope to know more later this week

Jill

-----Original Message-----
From: Cheryl Richardson@bridge bellsouth com
[mailto:Cheryl Richardson@bridge bellsouth com]
Sent: Friday, December 01, 2000 11:11 AM
To: Williamson, Jill R, NCAM
Cc: Sandra Jones5@bridge bellsouth com;
Cheryl Richardson@bridge bellsouth com;
Ranae Stewart1@bridge bellsouth com
Subject: GA1000 OS/DA Test using Line Class Codes (LCCs)
Importance: High

Jill,

I have investigated this issue The line class codes were installed in the correct switch, 5E, in the Peachtree Place Central Office However, our service order generator system was programmed to add the line class codes to TNs out of the DMS switch, which I understand does not help AT&T in testing OS/DA with the GA1000 trial

Ranae is taking this issue to IT to find out when the necessary correction can be made

We will keep you informed

Sincerely,
Cheryl Richardson
AT&T Account Team

Federal Communications Commission
Washington, D C 20554

September 27, 1999

Nancy E Lubamersky
Executive Director
Regulatory Planning
U S WEST
11 Upper Ardmore Road
Larkspur, CA 94939

Dear Ms. Lubamersky

During the course of the last several weeks, members of the Common Carrier Bureau's Policy and Program Planning Division ("Division") have met with representatives from U S WEST to discuss third-party testing of operations support systems ("OSS") and the competitive local exchange carriers ("CLECs") access to those systems. The Commission has previously indicated that for a Bell Operating Company ("BOC") to obtain approval under section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA services, it must demonstrate that it provides to CLECs nondiscriminatory access to its OSS and that its systems are operationally ready and capable of handling reasonably foreseeable demand A number of companies, including yours, have undertaken or are developing independent third party tests of their OSS

The purpose of the discussions between Division staff and interested parties has been to provide guidance on important elements that a third-party test should include to assist our determination that a BOC is providing nondiscriminatory access to its OSS. These views represent the current thinking of the Common Carrier Bureau and are in no way binding on the Commission. Any final determination concerning whether a BOC is providing nondiscriminatory access to its OSS will be made based upon the record in a section 271 application It is my hope, however, that the Bureau's views on these issues will be helpful to you and other Bell Operating Companies in formulating successful section 271 applications

1. Performance Measure Evaluation

A thorough and well-documented independent assessment of the data collection and calculation processes for performance data will considerably facilitate the Commission's review of a section 271 application. An independent review of the performance measurements is crucial in determining the accuracy and validity of performance data In particular, the staff believes that such an independent review would include the following qualitative and quantitative aspects

- An evaluation would include an assessment of whether the raw data being collected by the BOC is accurate, which could be tested by observing the raw data collection processes and by comparing the BOC's raw data to independently-collected data

- The evaluation would assess the processes by which the raw data is filtered and transformed into final, reported results

- The evaluator would assess whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules.

- The evaluator would assess the adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data (such as the controls over personnel access to the databases, and the controls that ensure that the programs and program modifications are properly authorized, documented, tested and approved).

- The evaluation would include an independent quantitative verification of the reported performance data. To accomplish this, the evaluator could be provided with the BOC's raw data and independently process the data, pursuant to the business rules, to ensure that the stated calculations and algorithms have been accurately applied.

We note that a comprehensive evaluation of the BOC's performance measure processes may include elements in addition to those listed above, as determined by the states or by an independent evaluator. Accordingly, we encourage BOCs to make the details of the proposed evaluation available to the Commission, and to the public, as they are developed

2. Change Management Test

We also believe it critical that there be an independent review of a BOC's change management process and procedures as well as its implementation of these procedures [1] The change management test should provide information which can be used to evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates. The independent evaluator should assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release. The following

[1] For purposes of this discussion, we use the phrase "change management process" as referring to the management of changes to OSS interfaces that affect CLECs' production or test environments Such changes may include 1) operations changes to existing functionality that impact the CLEC interface(s) upon a BOC's release date for new interface software, 2) technology changes that require CLECs to meet new technical requirements upon a BOC's software release date, 3) additional functionality changes that may be used at the CLEC's option, on or after a BOC's release date for new interface software, and 4) changes that may be mandated by regulatory bodies

elements would be indicative, but not dispositive, of a satisfactory change management process and should be evaluated by the independent third-party:

- CLEC Participation: CLECs would have a role in the development of, and modifications to, the change management process

- Release Implementation. Prior to issuing a new software release or upgrade, the BOC would provide a testing environment that mirrors the production environment in order for CLECs to test the documentation for the new release The testing environment would be stable (*i e* , no changes by the BOC), and would be maintained for an adequate time-period, at least 30 days, for the CLECs to test. To ensure CLECs are not forced to cut over to a new release prematurely, a BOC could adopt a "Go/No Go" vote process to decide whether to implement a new release. Pursuant to this process the new release is delayed if a majority, such as two-thirds, of eligible CLECs vote to delay the release. Similarly, a BOC could maintain a pre-existing version, or versions, of the interface (*e g* , Electronic Data Interchange) when issuing a new release rather than switching directly from one version to the next.

- Memorialization of Process: The change management process would be clearly memorialized and set forth in one document that can be readily accessed by the CLECs Any modifications to the change management process would be included with this document.

- Dispute Resolution: There would be a dispute resolution process for change management that is separate and apart from any process that is set forth in interconnection agreements. This would provide CLECs a forum specifically designated to resolve any change management disputes

3. xDSL Testing

The third-party test would test significant volumes of xDSL orders (*i e* , xDSL capable loops)

4. Normal, High, and Stress Volume Testing

- Normal and High Volume Testing: The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems.[2] The mix of transactions would replicate expected CLEC

[2] An incumbent LEC's internal ordering system permits its retail service representatives to submit retail customer orders electronically, directly into the ordering system This is known as "flow-through " Similarly, a competing carrier's orders "flow through" if they are transmitted electronically (i e , with no manual intervention) through the gateway into the incumbent LEC's ordering systems Order flow-through applies solely to the OSS ordering function, not the OSS provisioning system In other words, order flow-through measures only how the competing carrier's order is transmitted to the incumbent's back office ordering system, not how the incumbent ultimately completes that order Electronically processed service

ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end (*i e* , through the receipt of order confirmation notice or electronic error notice). "Normal" volumes would be based on the BOC's reasonable estimate, with input from CLECs, of daily order volumes "High" volumes would be significantly greater than normal volumes and based on the BOC's reasonable estimate, with input from CLECs, of forecasted demand.

- Capacity or Stress Testing· The third-party stress test would assess scalability of the BOC's OSS systems by testing a mix of transactions similar to those in the normal and high volume testing. These volumes would be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems

5. Pseudo-CLEC

If no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the 1996 Act, the third-party tester should build a pseudo-CLEC. The pseudo-CLEC should build an interface not only to test the quality of the BOC's documentation for such OSS systems but also to ensure that these systems are capable of submitting and receiving valid transactions The pseudo-CLEC should build the interface(s) using the BOC's documentation and business rules to determine whether any CLEC can build an interface based upon these materials Third-party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.

6. Dissemination of Information

A third-party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third-party tester that arise during the course of testing Staff proposes the following options for reporting problems:

- Report issues as they arise; or
- Issue reports pursuant to a specified time-frame (*i e* , weekly or bi-weekly); or
- Issue an interim report in the middle of the test and a final report at the end.

Combinations of these options could provide optimal balance between frequency and detail

7. Functionality

- CLECs would be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region

---

orders are more likely to be completed and less prone to human error than orders that require some degree of human intervention

- Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (*i e* , orders should be actually provisioned), as applicable

This letter is intended to provide a summary of staff views regarding key elements of a third-party test which could assist our determination that a BOC's OSS is operationally ready and capable of efficiently supporting ever-increasing volumes of transactions It is not, however, intended to be an exhaustive list of the necessary elements for a successful third-party test. Moreover, it is possible that additional issues will be raised by interested parties in future section 271 dockets. I emphasize that any final determinations regarding whether a BOC is providing nondiscriminatory access to its OSS will be made by the Commission based on the record of the BOC's 271 application for a particular state. To this end, Bureau staff is committed to working with all parties to ensure that the section 271 application process is as orderly and predictable as possible.

For information purposes, a copy of this letter will be placed in CC Docket No 98-121[3] and CC Docket No 98-56[4]

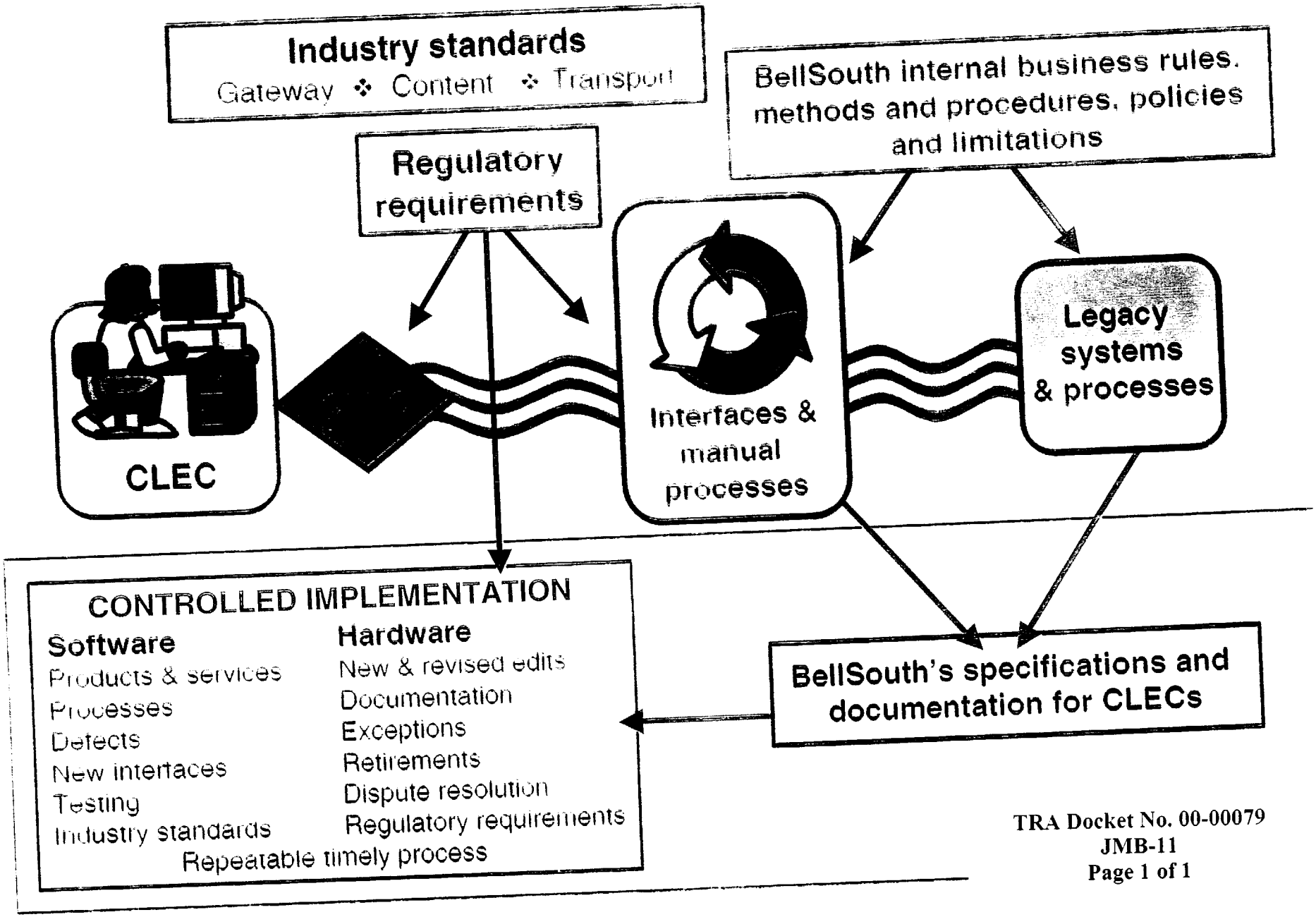
Sincerely,

Lawrence E Strickling, Chief
Common Carrier Bureau

[3] Application of BellSouth Corporation, BellSouth Telecommunications, Inc , and BellSouth Long Distance, Inc , for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998)

[4] Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998)

Change control process



TRA Docket No. 00-00079
JMB-11
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BELLSOUTH

CHANGE CONTROL PROCESS

CCP8_23.DOC

VERSION 2.0

~~AUGUST 23~~OCTOBER 27, 2000

Issued: 10/27/00 ~~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	- Added "testing" under process changes

		Section 2	- Clarification provided in "Change Review 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 All	Notification Sample, CR Log Legend - Added BellSouth Versioning Policy Word changes to provide clarification throughout the document
2 0	08/23/00	Cover Section 3 Section 5 Section 10 Section 11-Terms & Definitions Appendix A All	- Removed "Interim" from cover - Updated Type 6 definition to incorporate new defect and expedited feature definitions - 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 - Added Internet Web sites for EDI and TAG Testing Guidelines - Updated definition for Defect Added definitions for Expedited Feature, High, Medium and Low Impacts - Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control Also added High, Medium and Low Assessment of Impact Levels - Referenced the handling of expedites and expedite notification where appropriate

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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)~~
- Coordination of test agreements will continue to be supported by the Account Team
- 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

- 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.

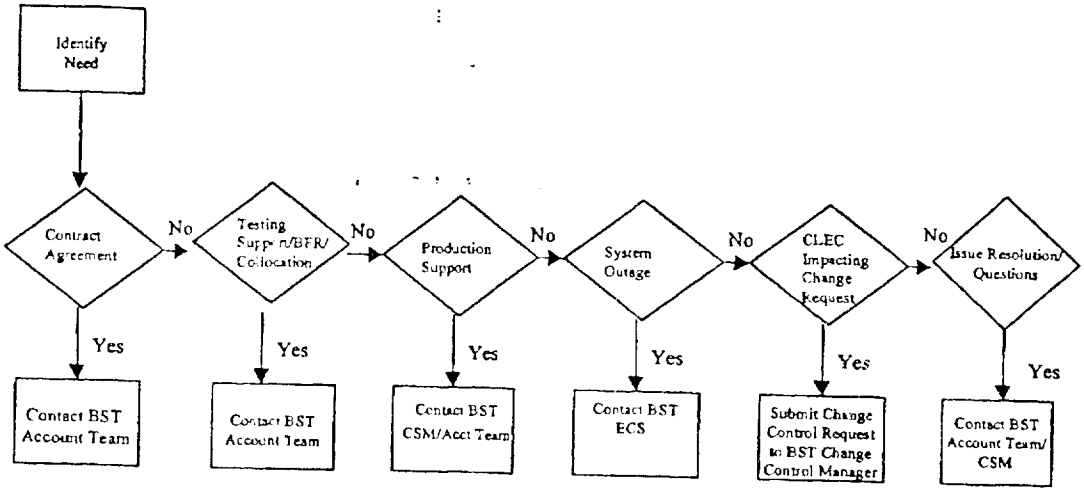
Type 6- CLEC Impacting Defects/~~Expedites~~.

A defect is Aany 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

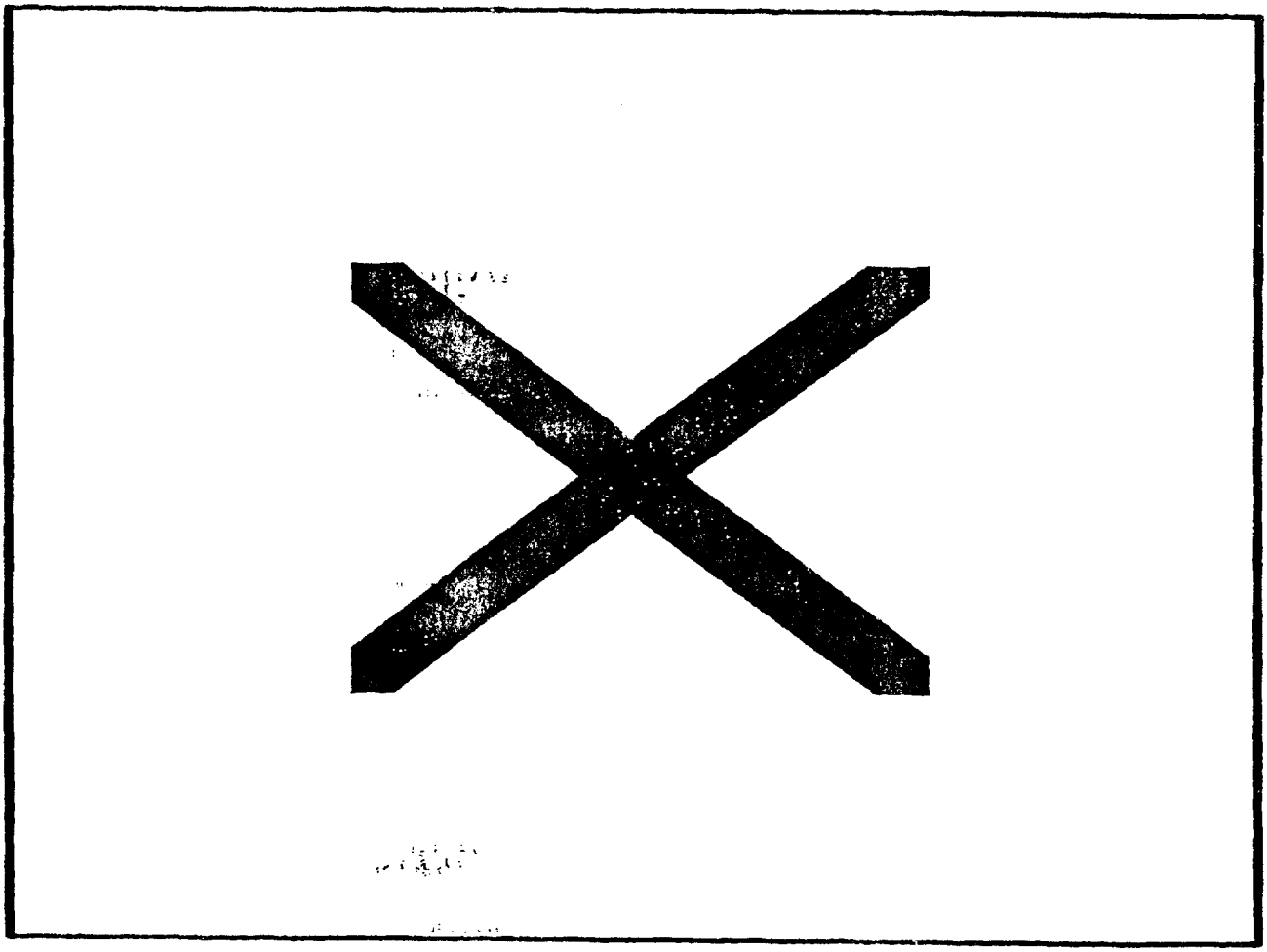


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Figure 3-1. Change Control Decision Process

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:



[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

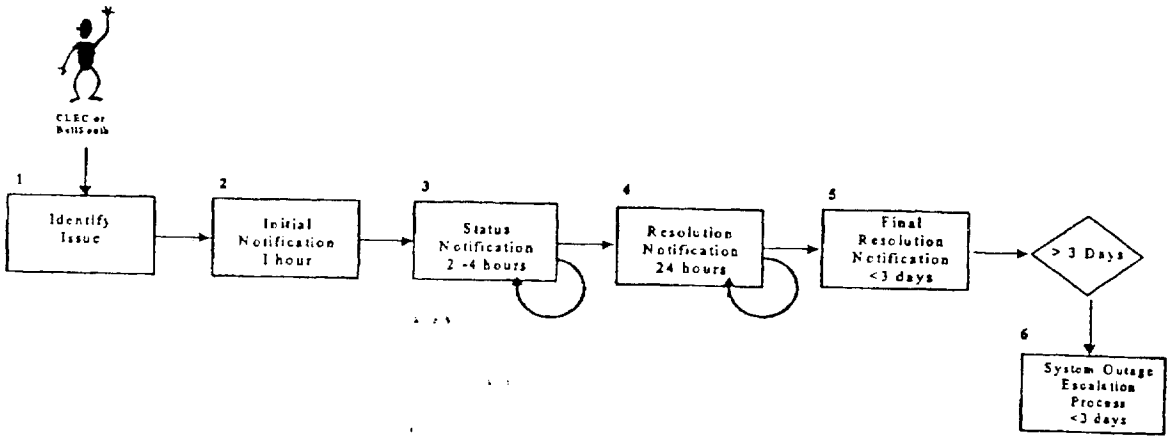


Figure: 4-2. Type 1 Process Flow

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.	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 I 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	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
		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		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.

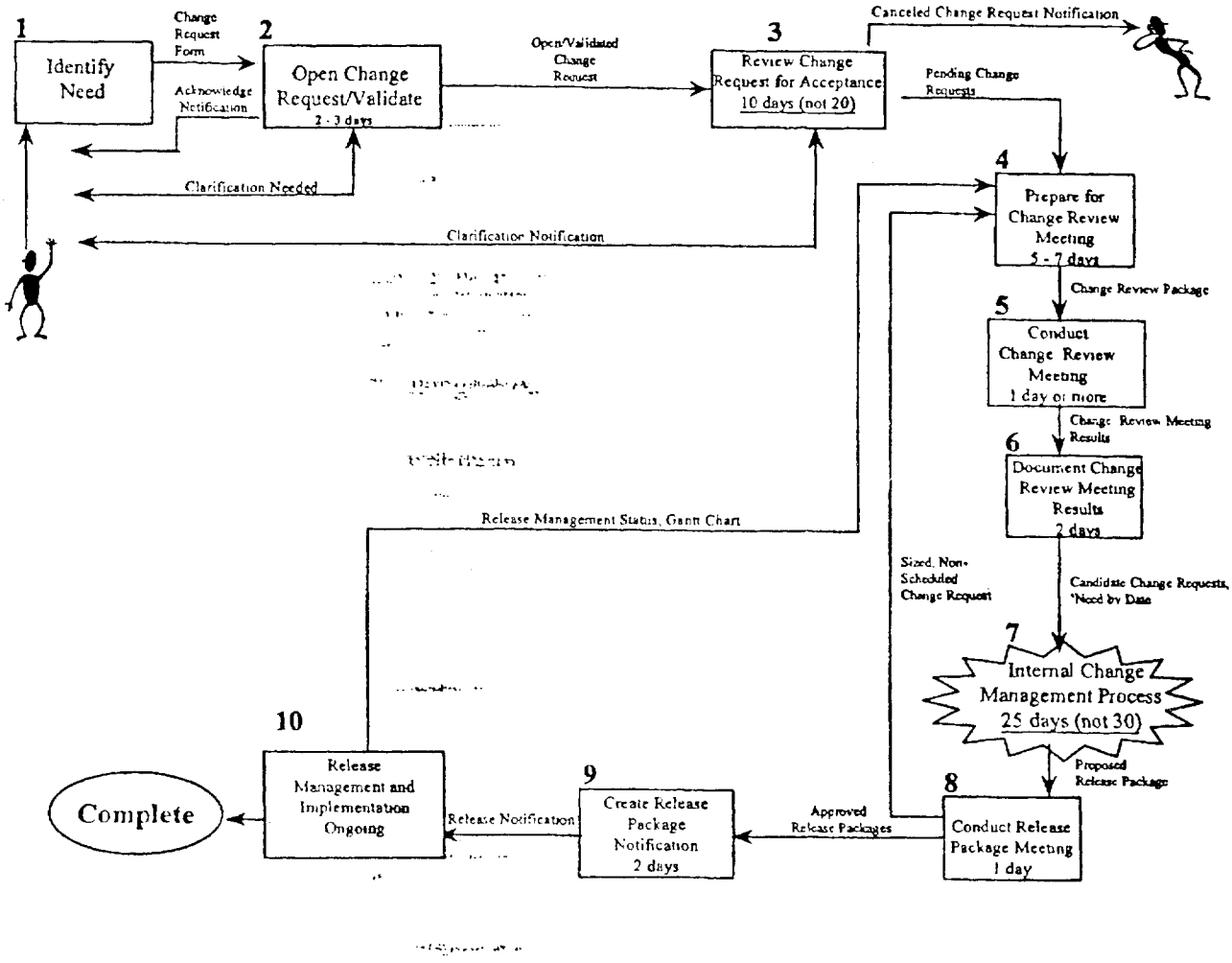


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above

- 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.

~~□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	INPUTS: • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) OUTPUTS: • Completed Change Request Form with related	N/A

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		specification documents (See Attachment A-1A, Item 22) 4 Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth	documentation	
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	2-3 Bus Days 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 CLEC training issue ~~or training issue~~ forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C'	INPUTS: • New Change Request • Validated Change Request • Clarification Notification (if required) OUTPUTS: • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required)	~~20~~ 10 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		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 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	• CR status updated on web	

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		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 5. Provide size and scope information on each pending change request to CLECs. 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/expedites) at monthly status meeting 3 Review current Release Management statuses 4. Review issues and action items and assign owners.	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	1 Bus Day (or as needed based on volume) Meeting Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		5. Present new change requests submitted since previous Monthly Status Meeting. **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. BellSouth presents size and scope of each change request and potential release package combinations. ~~3.~~4. Discuss Impacts 4.5. Prioritize Change Requests ~~5.~~6. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests ~~6.~~7. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate ~~7.~~8. Review issues and action items and assign owners	(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~~	INPUTS: • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log	~~30~~ 25 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~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.	OUTPUTS: • BellSouth's Proposed Release Package (s) • CLEC analysis.	
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.~~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"	INPUTS: • BellSouth's Proposed Release Package (s) • BellSouth's Release Schedule • 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.	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
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 • For new features or changes to existing functionality, ~~D~~draft Specifications and Requirements will be provided NLT 90 days in advance of Implementation. • For new features or changes to existing functionality, ~~F~~final Specifications and Requirements will be provided NLT ~~3~~045 days in advance of Implementation. • 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 • Implementation will occur NLT 6 months from the date of the prioritization of each change request.	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 Request	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		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.		

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.

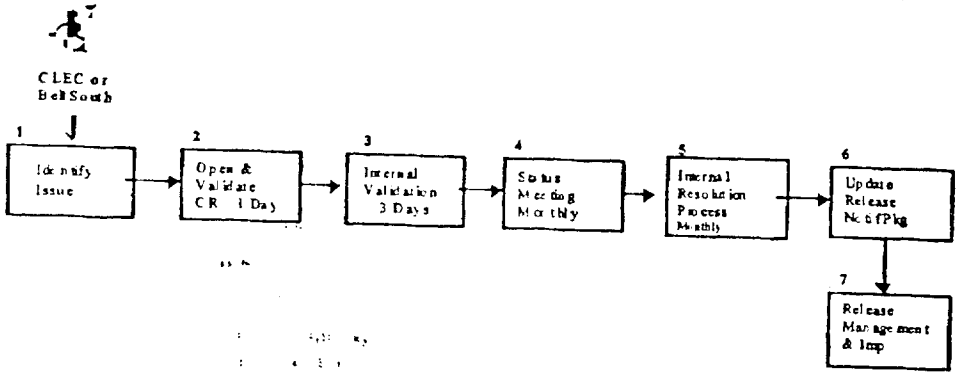


Figure 4-4. Type 2-5 Exception/Expedited Feature Process

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.	INPUTS: • Completed Change Request Form (with related documentation if necessary)	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		2 Send Acknowledgment Notification via email to initiating CLEC. 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.	**OUTPUTS:** • 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-	**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
		classify as a standard feature change, provide supporting information via 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,	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
		best effort, as determined by the consensus of the CCP Members at the Monthly Status Review Meeting.		
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.
- or where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data.

Definition of a defect also ~~This~~ includes errors in documentation, unclear documentation or missing 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**

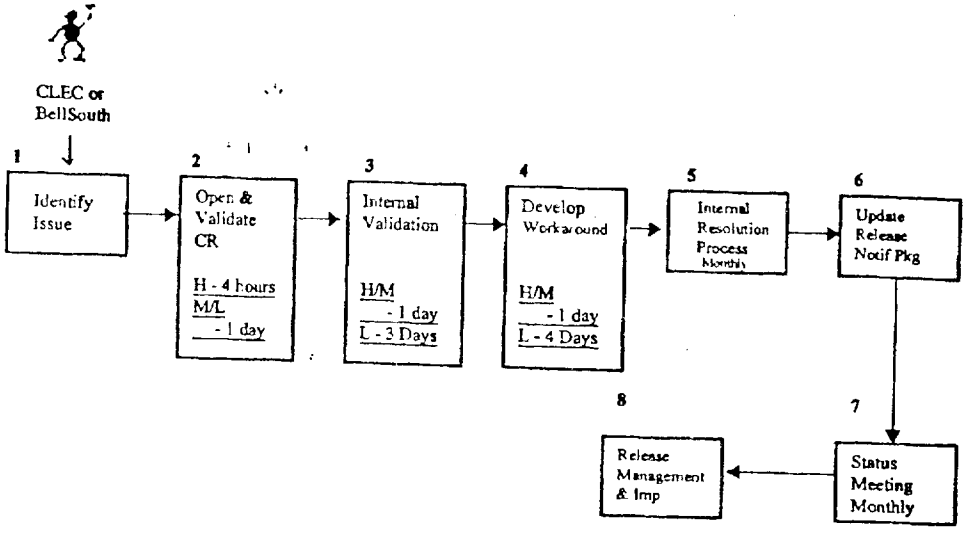
The failure causes impairment of critical system functions, though a workaround solution does exist.

- **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).	INPUTS: • Completed Change Request Form (with related documentation if necessary) OUTPUTS: • New Defect/Expedite • Acknowledgment Notification • Clarification Notification (if	4 hours for High Impact 1 Bus Day for Medium and Low Impact

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		3. 10. BCCM reviews change request for 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.	required)	
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~~ • 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	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 Medium and Low Impact

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		resolve the issue. ~~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 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 11~~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 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~~	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

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~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		
~~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)~~ ~~OUTPUTS:~~ ~~□Updated status~~ ~~□Updated Change Request Log~~ • ~~Meeting minutes~~	~~Monthly or when status 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.

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
~~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" 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/~~expedite~~s (may be less than 30 days)
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	INPUTS: • Approved Release Package Notification OUTPUTS: • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		in a release, the status will be changed to "I" for Change Implemented		

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)
- BellSouth's estimate of the size and scope of each Change Request

- Schedule of releases and capacity in each
- 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.
- 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~~ 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 will develop several variations of release packages to include all of the prioritized requests.
- 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 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.

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

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs by submitting a Type 4 change request 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.

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 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

Type 2-5 Changes. Wwithin 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) Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7878 404-927-7828	Linda.Tate3@bridge.bellsouth.com Joy.A.Lofton@bridge.bellsouth.com
3rd Level	Doug McDougal Senior Director	404-927-7505	Doug.Mcdougal@bridge.bellsouth.com

	(for Systems Issues) 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.

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 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.

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

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CHANGE REVIEW PRIORITIZATION RANKING

CATEGORY / INTERFACE	CHANGE REQUEST	TITLE	RANKING
PRE-ORDERING	CR0020	VIEW MULTIPLE CSRs SIMULTANEOUSLY	4
	CR0047	DISPLAY ENHANCED MEMORY CALL ACCESS NUMBER	5
	CR0016	SERVICE INQUIRY ENHANCEMENT FOR SL1, SL2, DS0, DS1 AND ISDN	3
	TAG0812990001	PROVIDE CFA & NC / NCI CODES	2
	TAG0812990003	PARSED CSR	1
ORDERING	CR0014	FOR CHANGE ORDERS, CHANGE VERBIAGE ON LENS SCREEN TO READ "NUMBER OF FEATURES TO ADD/DELETE" vs "NUMBER OF FEATURES TO ADD"	18
	CR0015	ACT OF C - CHANGE BASIC CLASS OF SVC.	15
	CR0031	ABILITY TO CHANGE LISTING ACCOUNT IN LENS	14
	CR0045	CONVERSION AS IS - STRIP NON-RESELLABLE USOCS	16
	CR0085	WEB-BASED LSR	13
	EDI0812990003	411 DROPS	4
	EDI0812990004	CHANGE MAIN ACCOUNT NUMBER	11
	EDI0812990005	HANDLING OF REMAINING SERVICE	9
	EDI0812990007	USE OF LEAN / LEATN FIELDS	12
	EDI1215990001	TN vs RSAG VALIDATION	6
	EDI020900_001	ELECTRONICALLY ORDER ROUTING TO OS / DA	8
	EDI030300_001	EDI TEST ENVIRONMENT	1

CATEGORY / INTERFACE	CHANGE REQUEST	TITLE	RANKING

TARGETED RELEASES 8.0, 8.1, 9.0 and 10.0 SCOPE

Release 8.0 Target Implementation Date: **11/18/00**

Change Request #	Change Request Title-Targeted Features
EDI020900_001	Electronically Order Routing to OS/DA
CR0045	Conversion As Is – Strip Non-Resellable USOCs
CR0015	ACT of C – Change Basic Class of Service
CR0014	For Change Orders, Change Verbiage on LENS Screen to Read "Number of Features to Add/Delete" vs "Number of Features to Add"
OSS99	TAG DID

Release 8.1 Target Implementation Date: **12/09/00**

Change Request #	Change Request Title-Targeted Features
EDI030300_001	CLEC Test Environment

Release 9.0 Target Implementation Date: **01/06/01**

Change Request #	Change Request Title-Targeted Features
	Number Pooling Mandate – Florida only
CR0030	UNE to UNE Migrations
EDI0812990003	411 Drops
CR0003	RPON Electronic Reject & Flow Through
EDI1215990001	TN vs RSAG Validation

Release 9.0 Target Implementation Date: **01/20/01**

Change Request #	Change Request Title-Targeted Features
	Number Pooling Mandate – all other states

TARGETED RELEASES 8.0, 8.1, 9.0 and 10.0 SCOPE

Release 10.0 Target Implementation Date: **05/31/01**

Change Request #	Change Request Title-Targeted Features
CR0002	Pre-Order/Order Business Rule Discrepancies
TAG0812990001	Provide CFA & NC/NCI Codes
EDI0812990005	Handling of Remaining Service
EDI0812990004	Change Main Account Number
EDI0812990007	Use of LEAN/LEATN Fields
CR0016	SI Enhancement for SL1, SL2, DS0, DS1 and ISDN
CR0029	Partial Migration of UNE Loops
CR0038	TOS Field on ReqTyp J
CR0040	Order Tracking Request

Notes:

TAG0812990003 – Parsed CSR – jointly begin addressing 10/3/00.

CR0078 – Extended Loops is targeted for implementation late 2001 with other 319 products.

-----Original Message-----
From: Williamson, Jill R, NCAM
Sent: Thursday, September 07, 2000 7:30 PM
To: 'Valerie Cottingham'
Cc: 'Sandra C. Jones'; 'Jan M. Burriss'; 'McDougal, Doug'; 'Lofton, Joy'
Subject: ESCALATION: Impacts Of OSS 9G
Importance: High

Valerie,

This is to escalate on BellSouth's response to my concerns regarding BellSouth's implementation of BellSouth's Business Rules for Local Ordering, Issue 9G and LEO Vol 1, Issue 7R. As I stated in my message to Change Control, BellSouth's unilateral implementation of business rule changes without going through change control or regard to the impacts on CLECs is unacceptable. Once again, BellSouth did not follow the Change Control process. If the changes are implemented as scheduled by BellSouth, orders will be rejected and ultimately, customer's due dates will be missed.

Once again, I am requesting that BellSouth withdraw its business rule changes and place its request through Change Control. Given the short timeframe in which we have to work, I'm requesting your response no later than close of business Monday, September 11.

Sincerely,

Jill Williamson

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Thursday, September 07, 2000 5:22 PM
To: Williamson, Jill R, NCAM
Cc: Valerie.Cottingham@bridge.bellsouth.com;
Sandra.Jones5@bridge.bellsouth.com; Doug.Mcdougal@bridge.bellsouth.com;
Beverly.Sheltonwilliams@bridge.bellsouth.com
Subject: Impacts Of OSS 9G

Jill,

This is to acknowledge your email regarding the impacts of BBR-LO Issue 9G.

We are currently investigating your concerns. We acknowledge that the documentation defects should have funneled through Change Control, but did not.

We are working diligently to adhere to the process.

The 9G business rules will go into effect 10/2/00. They were posted to the Web on 8/31/00, which provided the CLEC community with at least 30 day advance notice. BellSouth does not plan to withdraw these business rules.

We will follow up with you by no later than Monday, September 11 with additional information.

Please let us know if you have questions or wish to discuss.

Thanks,

Change Control Team

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 10_/_3_/_00(2)

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

☒ TYPE 6 (DEFECT/EXPEDITE) OCN _7125__(3A)

Company Name____AT&T_____(4)

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

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

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

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

Title of Change ___Release 7.1 Caused Defects _____(13)

Category ☐ Add New Functionality ☐ Change Existing (14) Desired Due Date _10/_4_/_00_(15)

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

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

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ 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) _AT&T began receiving invalid fatal rejects on orders sent to BellSouth on Monday, October 2. It appears that these rejects are as a result of BellSouth's implementation of Release 7.1. The reject messages are R1640 – No original LSR found for this Sup; R1170 – CHC required when REQTYP is A or B and DFDT is populated; S3530 – LOCNUM-000 LNUM-00001 TELNO=NPT required with this REQTYP LNA type combination. An example PON is ZXMIAB0000876.

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)

10/05/2000

This issue has been validated as a DEFECT, where the "NPT" value was populated on the wrong field. The defect has been corrected and is currently being tested.

The fix is targeted for production on 10/6/00.

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: 10/06/00

BELLSOUTH

Change Control Process
Change Review Meeting Minutes

DATE: September 27, 2000

MEETING: Change Review Meeting

PURPOSE: Monthly Status Meeting and Prioritize Pending Change Requests

ATTENDEES

Donna Graham - Mantiss	Manuel Lozano - Nightfire	Kristen Hudson – XO Communications (formerly Nextlink)
Rae Dupraw - Mpower	Wayne Johnson - BST	Bob Henderson – SBC Telecom
Kevin McCall - BST	Cathy Swift - BST	Stuart Walters – Network One
Mike Young - Telcordia	Jill Williamson - AT&T	Peggy Rehm - Nightfire
Bill Grant - Telcordia	Brenda Jones - BST	Kathy Rainwater - BST
Lorriane Watson - WorldCom	Sandy Evans - Sprint	Rodney Strawter - BST
Brian Rutter - KPMG	Stephanie West - BST	Tyra Hush - WorldCom
Richard Woodhouse- KPMG	Renard Robinson - BST	Selange Roberts – E.spire
Jamie Hunter - KPMG	Debbie Feir - BST	Woody Roe – Albion Connect
John Duffey - FL PSC	Joe Gray - BST	Kim Gillette-Hoskins - Quintessent
Cheryl Storey - BST	Valerie Cottingham - BST	Jerry Gaspardo - Mantiss
Brenda Files - BST	Steve Hancock - BST	Edwardine Marrone - BST
Jim Lenihan - Sprint	Mark Grossman - Telcordia	Rey McCabe – Network Telephone
E. R. Stewart – BST	Jean Ann Fuller - Trivergent	Les Hinton - PRISM

AGENDA

Agenda — Review status of all Types 2-6 Change Requests, review current Release Management statuses, report of system outages and discuss issues regarding the Change Control Process. Also Present, Discuss and Prioritize Pending Change Requests and Develop Candidate Change Request List.

BELLSOUTH

Change Control Process
Change Review Meeting Minutes

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AGENDA

Agenda — Review status of all Types 2-6 Change Requests, review current Release Management statuses, report of system outages and discuss issues regarding the Change Control Process. Also Present, Discuss and Prioritize Pending Change Requests and Develop Candidate Change Request List.

Opening	The BCCM opened the meeting and covered the items we were to accomplish at this meeting: • Review outstanding action items • Review regulatory mandates • Review status of all Types 2-6 Change Requests • Report of system outages • Review current Release Management statuses • Present and Discuss Pending Change Requests • Determine Priorities and Develop Candidate Change Request List for Release 10 • Open Discussion – Change Control Process • New Issues/Action Items A meeting will be scheduled in October to address CCP concerns/issues. Change Control will distribute notification of this meeting and solicit availability from the CLEC community.
Outstanding Action Items	1. Owner: BellSouth (CLOSED) Investigate if there will be a standard process for handling 411 drops. ***Status:*** The documented process for handling 411 drops and a standard form to be used to report 411 drops in batch will be presented at the 10/25/00 Monthly Status Meeting for CLEC input. 2. Owner: BellSouth (CLOSED) Add CR0110 to CR Log. ***Status***: Added to CR Log 8/24/00. 3. Owner: BellSouth (CLOSED) Send Steve Murray a copy of the CR Log and Defect/Expedite draft process that was discussed on the call. ***Status***: Sent 8/24/00 to Steve Murray via email. 4. Owner: BellSouth (CLOSED) Investigate time intervals for defect/expedite workaround. ***Status***: BST will not be able to reduce the 4-day time interval for defect workaround. 5. Owner: BellSouth (CLOSED) Investigate time interval for implementing a High Impact expedite. ***Status:*** High Impact Expedites will be implemented in the current, next release or point release, best effort. High Impact Expedites will be assessed on a case-by-case basis for impacts, and scheduled as needed. 6. Owner: BellSouth (CLOSED) Determine if BellSouth can provide a code "patch" (as a workaround) for expedites until a permanent fix is implemented. ***Status***: BST does not provide temporary code patches. We do provide workarounds for defects until they can be permanently fixed in a release. For defects, BST is committed to provide a workaround (when applicable) to the CLECs for the interim until the defect can be worked within the 4 to 25-business day range, best effort. The workarounds provided are not coding changes. The workarounds provide an alternative way to submit an order electronically or manually. BST utilizes resources to fix defects permanently in a release. For High Impact expedites, there is no electronic workaround. BST has committed to implement these in the current, next release or point release, best effort. These will be assessed on a case-by-case basis for impacts, and scheduled as needed. If necessary, an emergency point release would be implemented.

7. Owner: BellSouth (OPEN)
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.
Status: Received clarification on this issue from the originator (AT&T). AT&T requests 30 day interval because 5 days is sometimes not sufficient if process changes need to be made internally. BST is investigating.

8. Owner: BellSouth (OPEN)
Investigate search/sort capability for CCP web site.
Status: BellSouth has determined that it does not have the software to support this function. However, BST is in the process of determining the cost of additional software.

Outstanding Action Items from 9/18/00 Release 8.0 Package Meeting:

9. Owner: BellSouth (CLOSED)
OS/DA Routing – Determine process for other CLECs to utilize if interested in selective routing.
Status: Basic OS/DA routing functionality will be provided with Release 8.0 in November. CLECs interested in this functionality will not need to submit a Change Request; however, they will need to work with their Account Team to establish Line Class Codes and identify other unique characteristics that may be required.

10. Owner: BellSouth (OPEN)
Coding codes – 30 days not sufficient time for CLECs to make coding changes, need the business rules sooner. 30 days is sufficient for M&P changes only. Depends on size of release as to amount of advance notice needed.
Status: BST investigating.

Outstanding Action Items from 9/22/00 Release 8.0 Package Meeting:

11. Owner: BellSouth (OPEN)
CR0016 – SI Enhancement – Association with 319 products. Why are 319 products targeted for late 2001?
Status: BST investigating.

12. Owner: BellSouth (OPEN)
CR0002 – Pre-order/Order Field Discrepancies – defect vs. feature.
Status: BST is treating this issue as a feature because business rules reflect current coding. The application is operating as specified. CLECs advised this is a requirements defect and that the defect/expedite process is not working. BST is currently pursuing the possibility of implementing this change in Release 9.0.

Regulatory Mandates	CR0169 – Number Conservation Rules for Number Pooling (BellSouth) FCC99-200 (revised on 3/31/00 to FCC00-104). Florida 954 – FCC99-249. Florida State PSC docket number is 981-444TP. FCC has mandated Number Pooling in the Southeastern Region to avoid additional NPA NXX exhaust. Number Pooling is a process that allocates NPA-NXXs at the thousand-block level (NXX-X) within the rate center using LNP network infrastructure. It allows sharing of central office codes (NXXs) among multiple service providers serving the same rate center (TMRC). BellSouth is making updates internally to allow pooling. Targeted for Release 9.0 01/06/01 and 01/20/01. LSR changes are not necessary for Pooling. *Please see attached PowerPoint presentation.* CR0059 – Change TN Reservation Period to 45 days (pre-ordering functionality) (BellSouth) FCC Docket # 99200 Order # FCC00-104 Target date for implementation is 4Q00. CR0153 – CO Based Line Sharing (BellSouth) FCC Docket # 98-147 Scheduled for Release 7.1 September 30, 2000.
EDI Infrastructure Upgrade Overview	BellSouth is involved in a project to upgrade our EDI infrastructure. The new infrastructure will facilitate requests from Change Control, such as the CLEC Test Environment. The new infrastructure will also allow improvement in the delivery of Functional Acknowledgements, Firm Orders Confirmations, Notifications, Pending Order Status, etc. The target for migration of the CLEC EDI Application to the new infrastructure is December 1,2000. A CLEC Notification Letter will be sent in the next 30 days. To accommodate the migration to the new infrastructure BellSouth will freeze the EDI maps from October 6 until December 1, 2000. This freeze may delay the implementation of features that require a new or modified field for BellSouth and/or CLEC use. BellSouth will freeze the turn up of new EDI Trading Partners and new IP addresses from October 13 until December 15, 2000. It is BellSouth's desire to acknowledge all requests received prior to October 13, 2000. Requests received during the freeze window will be honored after December 15, 2000. An EDI User Group will be formed for the purpose of discussing the following: Details associated with the migration to the new infrastructure Development of requirements for Interactive Agent Development of requirements for pre-order functions If you would like to take part in the EDI User Group please send an e-mail to Change Control by October 6, 2000, with the following information: Name of Company Contact Name, Telephone Number, Email Address, and Mailing Address Topics of Interest A meeting of the EDI User Group will be targeted for the week of October 9, 2000.

New Change Requests (Types 2-5)	ORD030200_001 – UNE via ASR21 (AT&T & WorldCom) ***Status***: Jill (AT&T) and Tyra (WorldCom) advised to leave this CR open. ORD032700_001 – Post-FOC Clarification (AT&T) ***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. CR TAG0812990001 is targeted for Release 10 on 5/30/01. Jill (AT&T) advised this CR could be canceled. CR0012 – TAFI Functionality via ECTA Interface (AT&T) ***Status***: AT&T advised to leave this request open to continue discussions with BellSouth. CR0065 – Add LENS 6.3 Tutorial (Trivergent) **Status:** Originator advised to leave this CR on hold until they review the new web-based LENS course, which should be available late September. CR0087 – "C" Order Process for UNE-P (Sprint) **Status**: Conference call held on 09/25/00 with originator and BellSouth. BellSouth has committed to forward Sprint information on return FOC. Sprint will review information and determine if CR can be canceled. CR0093 – Electronic Change Notifications (Sprint) **Status**: On 09/15/00 originator requested place CR on hold. CR0095 – ECTA – Attribute Validation (BellSouth) ***Status***: Open for CLEC comments on whether this is a feature they would like to see implemented. CR0104 – LENS Large Account Inquiry (Marietta Fibernet) ***Status***: Placed in Pending status 9/26/00. Originator requested that we include on Prioritization list since this CR was submitted prior to the 8/15/00 cut-off date. CR0105 – Drop the RES ID to Requirement for xDSL Order (Nightfire) ***Status:*** Conference call held on 0915/00 with originator. Originator advised this issue is still under review until testing is complete. CR0130 – LESOG not Responding to "C" order adding line & features on Resale Accounts (BellSouth) ***Status***: Reclassified as a feature. Being reviewed for acceptance. CR0132 – Fielded Completion Notifications (WorldCom) ***Status***: Conference call held on 09/25/00 with originator. Originator agreed to forward information on OBF to Change Control. BST SME to revisit this issue. CR0135 – Merging of Accounts (AT&T) ***Status***: BellSouth is currently waiting on a reply to the response sent to the originator on this request. Jill (AT&T) questioned why CRs should be held until OBF resolves issues when CLEC's business needs may be more urgent. Jill stated this should be a joint decision regarding the disposition of CRs that are being addressed by OBF. Change Control will revisit and provide status. CR0143 – Notification – MDR (Mechanized Disaster Reports) (Verizon)

	Status: BellSouth response due to CLEC by 10/17/00. CR0144 – Add LSR Codes in LENS (BellSouth) ***Status***: Being reviewed for acceptance CR0145 – Remove a TN from a LENS LSR (BellSouth) ***Status***: Being reviewed for acceptance CR0146 – Default the Listed TN (BellSouth) ***Status***: Being reviewed for acceptance CR0147 – Seasonal Suspend (BellSouth) ***Status***: Being reviewed for acceptance CR0152 – Electronic Payphone Service Orders (BellSouth) ***Status***: Being reviewed for acceptance CR0157 – Need to Handle HTG USOCs for all calling plans on Port/Loop Combos (BellSouth) ***Status:*** Reclassified as a feature. Being reviewed for acceptance. CR0158 – Already Pending Error message on LSRs where order is being held to not auto clarify (BellSouth) ***Status***: Reclassified as a feature. Being reviewed for acceptance. CR0165 – Discrepancies in BellSouth Guidelines CG-LEO0-009-LNUMfield on Loop Service Page (Nextlink) ***Status:*** Being reviewed for acceptance. CR0166 – Cable ID Defect (BellSouth) ***Status:*** Reclassified as a feature. Being reviewed for acceptance. CR0167 – Incorrect Circuit # on FOC (BellSouth) ***Status:*** Reclassified as a feature. Being reviewed for acceptance.

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Pending **Change Requests**	The following Change Request is in pending status: • TAG0812990003 – Parsed CSR (AT&T) *Status*: Will begin jointly addressing 10/3/00. Once BST has a better understanding of CLEC requirements and complexity of this effort, this feature will be targeted for an upcoming release. • CR0134 – TN Reservation Display of Switch CLLI (AT&T) *Status*: Guidelines to be added by the end of October 2000 to the HELPFUL HINTS section of the BellSouth Pre-Order Business Rules document to further clarify the BellSouth response to this request.
Scheduled **Change Requests**	The following Change Requests are scheduled for upcoming releases: • EDI0812990003 – 411 Drops (AT&T) – Targeted for Release 9.0 – 01/06/01 • EDI0812990004 – Change Main Account Number (AT&T) – Targeted for Release 10.0 – 05/31/01 • EDI0812990005 – Handling of Remaining Services (AT&T) – Targeted for Release 10.0 – 05/31/01 • EDI0812990007 – Use of LEAN/LEATN Fields (AT&T) – Targeted for Release 10.0–05/31/01 • TAG0812990001 – Provide CFA & NC/NCI Codes (AT&T) – Targeted for Release 10.0 – 05/31/01 • EDI1215990001 – TN vs RSAG Validation (AT&T) –Targeted for Release 9.0 – 01/06/01 • EDI020900_001 – Electronically Order Routing to OS/DA (AT&T) – Release 8.0 - 11/18/00 • EDI030300_001 – CLEC test environment (AT&T) – Targeted for Rel 8.1 – 12/09/00 • CR0002 – Pre-Order/Order Business Rules Discrepancies (AT&T) – Targeted for Release 10.0 – 05/31/01 • CR0003 – RPON Electronic Reject & Flow Through (AT&T) – Targeted for Release 9.0 – 01/06/01 • CR0014 – Change Verbiage on LENS Screen (Trivergent) – Release 8.0 – 11/18/00 • CR0015 – LENS ACT of C – Change Basic Class of Service (BellSouth) – Release 8.0 – 11/18/00 • CR0016 – SI Enhancement for SL1, SL2, DS0, DS1 and ISDN (AT&T) – Targeted for Release 10.0 – 05/31/01 • CR0029 – Partial Migration of UNE Loops (ReqTyp A) (BellSouth) – Targeted for Release 10.0 – 05/31/01 • CR0030 – UNE to UNE Migrations (BellSouth) – Targeted for Release 9.0 – 01/06/01 • CR0038 – TOS Field on LSR ReqTyp J (BellSouth) – Targeted for Release 10.0 – 05/31/01 • CR0040 – Order Tracking Request (AT&T) – Targeted for Release 10.0 – 05/31/01 • CR0045 – Conversion As Is – Strip Non-Resellable USOCs (One Point) – Release 8.0 – 11/18/00 • CR0059 – Change TN Reservation Period (BellSouth) – Targeted for 4Q00 • CR0078 – Extended Loops (AT&T) – Targeted for implementation late 2001 with other 319 products • CR0109 – GA 912/229/478 NPA Splits (BellSouth) – Release 7.2 10/14/00 • CR0112 – Conversion As-Is ACT W Defect (Southern Telecom) – Rel. 7.1 – 9/30/00 • CR0115 – Partial Pre-Order Query Due Date Calculation (BellSouth) – Rel 7.1 9/30/00 • CR0116 – Premise Visit Indicator (BellSouth) – Rel 7.1 9/30/00 • CR0118 – Remove Housenumprefix for TAG API 2.2.0.10 (BellSouth) – Rel 7.1 9/30/00

	• CR0129 – LESOG failing to apply ZRTI to orders (BellSouth) – Rel 7.1 9/30/00 • CR0150 – Add NPT Data Element to the ESDQ Query (BellSouth) – Rel 7.1 9/30/00 • CR0153 – CO Based Line Sharing (BellSouth) – Rel. 7/1 9/30/00 • CR0159 – Discrepancies in BBR-LO Version 9G (BellSouth) – 9/28/00 update (9H) • CR0169 – Number Pooling Mandate (BellSouth) – Rel 9.0 01/06/01 and 01/20/01

Implemented Change Requests	• LSR0623990001 Redirection of UNE LSRs in the LCSC (AT&T) – LNP Rel 5.1 - 8/27/00 • CR0077 Subscription Version Cancellations (AT&T) – LNP Rel 5.1 - 8/27/00 • CR0089 – Reserving TNs via LENS (Advanced Tel) – Rel 6.4 - 6/17/00. • CR0092 – DFDT & CHC Defect Request (AT&T) – LNP Rel 5.1 - 8/27/00 (EDI only) • CR0102 – NUM=TELNO=ACCT is Final Reject (Access One) – Release 7.0 – 7/29/00. • CR0106 – Delay Sunset of LSOG2 xDSL Ordering via Fax (Nightfire) – delayed until 10/2/00. • CR0125 – Error when placing a change order to add VCA and RJ11C in LENs (New South) Rel 7.0 - 8/12/00. • CR0141 - LESOG should D&E vs. C&T when no CFN changes (BellSouth) – Rel 7.0 - 8/12/00.
Canceled Change Requests	The following change requests have been cancelled since our August 23 meeting: CR0013 – Date Sent/Century Defect (EDI) (Nextlink) CR0018 – USOC Segmentation (AT&T) CR0033 – EDI Multiple ReqTyp Enhancement (Nextlink) CR0039 – FOC Not Populating Order Number on Port Order (American Metrocom) CR0066 – Invalid USOC for Basic Class of Svc. Format SAE434 II CREX/TN (AT&T) CR0070 – Call Forwarding USOC Defect (AT&T) CR0107 – Documentation Defect – CIC (AT&T) CR0114 – TN Reservation Defect (AT&T) CR0120 – SOCS RT60 Invalid NPA/NXX for Routing SUB 001 (BellSouth) CR0123 – LENS Application Enhancement (Gulf Coast Communications) CR0140 – Update the Due Date Calculation Intervals in TAG (combined with CR0117) (BellSouth)
Defect/Expedite Change Requests (Type 6)	The following change requests statuses are provided: • CR0008 – YPQTY-WPQTY (Iss 7) ReqType –E Reject Code must be 2 numerics – (Deltacom) ***Status:*** Open – Currently under appeal. • 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 to be targeted for a future release. • 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. • CR0056 – Invalid SUP, Subscription Version Defect – (AT&T) ***Status:*** Determined to be a training issue and pending feedback from originator. AT&T advised to close this request. • CR0070 – Call Forwarding USOC Defect (AT&T) ***Status:*** 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. Originator advised to close this CR.

- 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.

- 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. Waiting on originator to close out.

- 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.

- 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.

- CR0121 – Discrepancies in BellSouth Guidelines – CG-LSOR-002 – (Nextlink)

Status: BellSouth has reclassified from a Feature to a Defect. Originator advised to close this request.

- 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.

- 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.

- CR0142 – Remove the business reference for RCFRE, RF, RG & RN in the RCF matrix of the LEO IG (BST)

Status: Determined to be a documentation defect and correction is targeted for Sept. 29.

- CR0151 – Error Code Defect (LNP) (AT&T)

Status: BellSouth is recommending that a Feature be opened to correct the LNP truncation. The feature will be implemented in a future release TBD.

- CR0154 – Missing Completion Notices Defect – (AT&T)

Status: BellSouth validated that the completion notices did not go back to AT&T because they were manually handled by a Service Rep. AT&T will be appealing this response for further validation.

- CR0155 – Ringmaster Defect (AT&T)

Status: BellSouth determined not a defect. Recommended to AT&T that this is a training issue. Originator advised to close this request.

- CR0156 – Connect:Direct Request – (AT&T)

Status: BellSouth recommended to AT&T to submit this as a change request for all CLECs benefit. System changes have been made and AT&T is waiting to test with BST.

- CR0162 – OTN Defect Issue 7 (Deltacom)

Status: BellSouth has determined that this is a defect and will be targeted for a future release.

- CR0163 – LESOG should not bring over FIDs on line USOCs for LNA of G (BST)

Status: BellSouth has determined that this is a defect and will be targeted for a future release.

Report of System Outages	The following Type 1 System outages have occurred since the last Status Meeting: LENS – 3 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	Release 7.1 is scheduled for 9/30/00: • CR0112 – Conversion As-Is ACT W Defect (Southern Telecom) • CR0115 – Partial Pre-Order Query DDC (BellSouth) • CR0116 – Premise Visit Indicator (BellSouth) • CR0118 – Remove HOUSENUMPREFIX from TAG (BellSouth) • CR0129 – LESOG Failing to apply ZRTI to orders (BellSouth) • CR0150 – Add NPT Data Element to the ESDQ Query (BellSouth) • CR0153 – CO Based Line Sharing (mandate) (BellSouth) Release 7.2 is scheduled for 10/14/00: • CR0109 – GA 912/229/478 NPA Split (BellSouth) Release 8.0 is scheduled for 11/18/00: • EDI020900_001 – Electronically Order Routing to OS/DA (AT&T) • CR0014 – Change Verbiage on LENS Screen (Trivergent) • CR0015 – LENS – ACT of C – Change Basic Class of Service (BellSouth) • CR0045 – Conversion As Is – Strip non-resellable USOCs (One Point) • OSS99 – TAG DID (BellSouth) • TAG Hardware upgrades (BellSouth) The target date for Release 8.1 is 12/9/00: • EDI030300_001 – CLEC test environment (AT&T) The target date for Release 9.0 is 01/06/01: • CR0169 – Number Pooling Mandate – Florida only (BellSouth) • CR0030 – UNE to UNE Migrations (BellSouth) • EDI0812990003 – 411 Drops (AT&T) • CR0003 – RPON Electronic Reject & Flow Through (AT&T) • EDI1215990001 – TN vs RSAG Validation (AT&T) The target date for Release 9.0 is 1/20/01: • CR0169 - Number Pooling Mandate-all other states (BellSouth) The target date for Release 10.0 is 5/31/01: • CR0002 – Pre-Order/Order Business Rules Discrepancies (AT&T) • TAG0812990001 – Provide CFA & NC/NCI Codes (AT&T) • EDI0812990005 – Handling of Remaining Service (AT&T) • EDI0812990004 – Change Main Account Number (AT&T) • EDI0812990007 – Use of LEAN/LEATN Fields (AT&T) • CR0016 – SI Enhancement for SL1, SL2, DS0, DS1 and ISDN (AT&T)

- CR0029 – Partial Migration of UNE Loops (BellSouth)
- CR0038 – TOS Field on ReqTyp J (BellSouth)
- CR0040 – Order Tracking Request (AT&T)

PENDING CHANGE REQUESTS Pre-Ordering CR0020	**The following pending change requests were presented/discussed:** **View Multiple CSRs Simultaneously (Trivergent)** Interface Impacted - LENS Pre-ordering Type Change – Add New Functionality • Capability to view multiple CSRs simultaneously in LENS
CR0101	**EDI Pre-Ordering Functionality (Nightfire)** Interface Impacted – EDI Pre-Order Type Change – Software • New functionality to include a new EDI Pre-order solution
CR0104	**LENS Large Account Inquiry (Marietta Fibernet)** Interface Impacted –Pre-ordering Type Change – Software • On Large ESSX or Centrex accounts, add capability to access numbers behind SLA's instead of going to non-key lines and searching entire list of numbers.
CR0113	**LENS Inquiry – View Customer Record (Southern Telecom)** Interface Impacted –Pre-Ordering Type Change – Software • Change existing functionality to allow a three digit customer code to be used in the validation of a customer record
CR0127	**Provide Pending Service Order for CSR via TAG (ITC Deltacom)** Interface Impacted –Pre-Ordering Type Change – Software • New functionality to alert the end user that a CSR is pending a Service Order during the pre-order step.
Ordering CR0031	**Ability to change listing account in LENS (Alltel)** Interface Impacted – Ordering Type Change – Change Existing • Ability to submit an order to change a listing on a CLEC owned NXX
CR0068	**Pipe-Cross USOC (AT&T)** Interface Impacted – Ordering Type Change – Software • Modify requirements to remove the Cross pipe line not part of CSR issue.
CR0085	**Web-based LSR (BellSouth)** Interface Impacted – LENS Ordering Type Change – Software • Place LSR templates on the WEB in the LENS site for manual CLECs to submit electronically • Editing will be done in LEO • FOC and other responses will be posted on the WEB for CLEC to retrieve • Electronic rate will apply • Front-end system will allow CLEC to download a copy of the completed LSR to SUP later. • 1st phase will include same ReqTyp's that can be submitted through LENS today.

CR0088	**Mech of Unbundled Network Terminating Wire (UNTW) (Media One)** Interface Impacted – Ordering Type Change – Software/Documentation/New or Revised Edits • Provide functionality to submit UNTW order electronically.
CR0091	**Add DFDT to the FOC (AT&T)** Interface Impacted – Ordering/LNP Type Change – Software • Confirm back the specific time in which the order will be cut, i.e., the requested Frame Due Time, on the FOC. • BellSouth will issue a jeopardy notice to the CLEC and call to negotiate the cut time if BellSouth realizes it will not make the requested DFDT.
CR0096	**New Listings in LENS (Alltel)** Interface Impacted –Ordering Type Change – Software • New functionality to allow the user to create "New Listings" in LENS
CR0117	**Update Issue 7 Due Date Calculation Intervals in TAG (BellSouth)** Interface Impacted – TAG Pre-Order/Ordering Type Change – Software/Documentation • Modify the Issue 7 Due Date Calculation Modules to update the tables in the TAG API with the BellSouth Product and Services Interval Guide. **NOTE:** This CR was implemented with TAG Release 2.2.0.11 on September 21. This change was included with the due date calculation tables. This CR was removed from the prioritization list.
CR0133	**Migration of UNE-P Notifications (WorldCom)** Interface Impacted –Ordering Type Change – Software/New or Revised Edits • Allow CLECs to migrate using Customer Name and TN, and not be required to supply the Service Address on ACT=V, P, Q to UNE-P. **NOTE:** This CR combined with EDI1215990001. This CR was removed from the prioritization list.
CR0137	**Flow-Through Change Request-ReqTyp CB (AT&T)** Interface Impacted –LNP Ordering Type Change – Software • Change existing systems to allow REQTYP CB, ACT P & Q to flow-through BellSouth systems without manual intervention
CR0149	**Modify and Resend FOC and Clarifications (BellSouth)** Interface Impacted – LNP Ordering Type Change – Software • Change existing systems to allow the ability to change a LSR status from Submitted to Clarified and/or Clarified to Submitted FOC
CR0160	**Flow-Through Change Request-ReqTyp BB (AT&T)** Interface Impacted –LNP Ordering

	Type Change – Software • Change existing systems to allow REQTYP BB, ACT P & Q to flow-through BellSouth systems without manual intervention

MANUAL CR0131	**Split Billing Requests (BellSouth)** Interface Impacted – Manual Type Change – Documentation/Process • Change existing functionality to provide instructions on how to submit split billing requests
Documentation CR0053	**Improvements to the BellSouth Business Rules for Local Ordering (Adelphia)** Interface Impacted – All Type Change – Documentation • Present the information in separate documents to reduce the size of the guide BST can separate the BBR-LO into separate guides. Efforts are underway to provide an enhanced "Search" capability, which will make navigating through the BBR-LO much easier. Also removing APPENDIX A information and moving Forms & Line-by-Line instructions back to the Complex Templates document is under evaluation.
CR0139	**Update TAG API Guide to relate to the BellSouth Pre-order Business Rules (BellSouth)** Interface Impacted – TAG Pre-Order/Order Type Change – Documentation • Better clarification between the API Guide and the BellSouth Pre-Order Business Rules
Final Prioritization	**The results of the prioritization are as follows:** **Pre-Ordering Category** Rank #1 – CR0127 – Provide Pending Service Order for CSR via TAG (ITC Deltacom) Rank #2 – CR0113 – LENS Inquiry – View Customer Record (Southern Telecom) Rank #3 – CR0101 – EDI Pre-Ordering (Nightfire) Rank #4 – CR0020 – View Multiple CSRs Simultaneously (Trivergent) Rank #5 – CR0104 – LENS Large Account Inquiry (Marietta Fibernet) **Ordering Category** Rank #1 – CR0091 – Add DFDT to the FOC (AT&T) Rank #2 – CR0149 – Modify & Resend FOCs & Clarifications (BellSouth) Rank #3 – CR0137 – Flow Through for REQTYP CB, ACT P & Q for LNP (AT&T) Rank #4 – CR0160 – Flow Through for REQTYP BB, ACT P & Q for Loop w/LNP (AT&T) Rank #5 – CR0068 – Pipe Cross USOC (AT&T) Rank #6 – CR0088 – Mech of Unbundled Network Terminating Wire (UNTW) (Media One) Rank #7 – CR0096 – LENS Enhancement – Add New Listings (Alltel) Rank # 8 – CR0031 – Ability to Change Listing Account in LENS (Alltel) Rank # 9 – CR0085 – Web-based LSR (BellSouth) **Manual Category** CR0131 – Split Billing Requests (BellSouth) **Documentation Category** Rank #1 – CR0139 – Update TAG API Guide to Better Relate to the TAG Pre-Order Rules (BellSouth)

	Rank #2 – CR0053 – Improvements to the BBR-LO (Adelphia)

Open Discussion- Change Control Process	No new CCP issues were raised. We will be discussing the ones reflected in the "Action Items" section at our October Process Improvements meeting.
Upcoming Meetings	• Parsed CSR (CR# TAG0812990003) conference call is **October 3, 2000** from 10:00 AM – 12:00 Eastern. The conference bridge is 205-970-3742, access code 6637. • EDI User Group meeting is targeted for week of October 9, 2000. • Release 8.0 User Requirements meeting targeted within two weeks. • CCP Process Improvements meeting to be scheduled **October 17 or 26** (refer to 9/28/00 email requesting availability). • Our next monthly status call is **October 25, 2000**. The conference bridge is 205-970-3741, access code 4736. • Target date for the Internal Change Management Process to be completed is November 13, 2000. During the Internal Change Management Process, both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities for the Candidate Change Requests. • A Release Package Meeting will be held in conjunction with our Monthly Status Meeting on **November 15** to present/discuss the scope of Release 10.0 (targeted for 05/31/01).
Action Items	1. Owner: BellSouth (CLOSED) Distribute notification to CLEC community regarding October CCP Process Improvements meeting. ***Status***: Distributed 9-28-00. 2. Owner: BellSouth (OPEN) Provide revision history with Carrier Notification Letters associated with documentation updates. This issue to be addressed at the October Process Improvements meeting 3. Owner: BellSouth (OPEN) Have BST SMEs available at the Monthly Status Meetings to discuss Carrier Notification Letters distributed by Change Control. This issue to be addressed at the October Process Improvements meeting. 4. Owner: BellSouth (OPEN) Defect/expedite process. This issue to be addressed at the October Process Improvements meeting. 5. Owner: BellSouth (OPEN) BST provide milestones for release management. This issue to be addressed at the October Process Improvements meeting. 6. Owner: BellSouth (CLOSED) Change Control will provide soft copy of Number Pooling presentation. ***Status***: Presentation provided with 9/27/00 meeting minutes. 7. Owner: BellSouth (CLOSED) Change Control will distribute notification regarding EDI Infrastructure Upgrade Sub team. ***Status***: Distributed 9-29-00. 8. Owner: CLEC Community (OPEN) CLEC Community will send Change Control any identified requirements for Parsed CSR.

9. Owner: BellSouth (OPEN)
Investigate if reason for system outage can be provided on notification.

10. Owner: BellSouth (OPEN)
Include associated documentation on CCP Release schedule.

11. Owner: BellSouth (CLOSED)
Provide Web site location for CCP Release Schedule.
Status: The CCP Release Schedule is located at the following Web site:

www.interconnection.bellsouth.com
Select "Local Exchange Carriers"
Select "Change Control Process"
Select "Statuses/Release Notification/Proposed Release Schedule"

12. Owner: BellSouth (OPEN)
Add the originator to the title column on the CR Log.

13. Owner: BellSouth (OPEN)
Change the format of the BellSouth Business Rules for Local Ordering (BBR-LO) guide. This issue to be addressed at the October Process Improvements meeting.

14. Owner: BellSouth (CLOSED)
Provide CLECs where general information can be found on 319 products.
Status: Information on 319 products can be found on the Interconnection Web site at the following location:

www.interconnection.bellsouth.com
Select "Local Exchange Carriers"
Select " CLEC Products"
Select "UNE Products"

Questions regarding the 319 Products should be directed to your Account Team representative.

15. Owner: BellSouth (OPEN)
Revisit CR0135 and provide originator status.

16. Owner: BellSouth (OPEN)
Determine if notification of BST process changes (i.e., system downtime, LCSC processes) can be provided 30 days in advance to accommodate CLEC's internal M&P changes.

17. Owner: BellSouth (OPEN)
Investigate cost for additional software needed to support the search/sort capability for CCP web site.

18. Owner: BellSouth (OPEN)
Coding changes – 30 days not sufficient time for CLECs to make coding changes, need the business rules sooner. 30 days is sufficient for M&P changes only. Depends on size of release as to amount of advance notice needed. This will be addressed at the October CCP Process Improvements meeting.

19. Owner: BellSouth (OPEN)

	CR0016 – SI Enhancement – Association with 319 products. Why are 319 products targeted for late 2001. 20. Owner: BellSouth (OPEN) CR0002 – Pre-order/Order Field Discrepancies. BST pursuing the possibility of implementing this change in Release 9.0.

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

MEETING MINUTES

Agenda Items	Discussion
1. 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.
	ACTION ITEM (BELLSOUTH) - Determine who initiates a change request when identified by a CLEC and Account Team.

October 17, 2000
CCP Process Improvement Meeting
MEETING MINUTES

Agenda Items	Discussion
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.

October 17, 2000
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.

BELLSOUTH

October 17, 2000
CCP Process Improvement Meeting
MEETING MINUTES

Agenda Items	Discussion
7. 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.
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

BELLSOUTH

October 17, 2000
CCP Process Improvement Meeting
MEETING MINUTES

Agenda Items	Discussion
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**

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

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)

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.

BELLSOUTH

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.

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

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.

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
	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)

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
	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.
4. 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.

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
	• 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**

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

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Tuesday, December 05, 2000 5:55 PM
To:
Subject: ID: "Marked Up CCP Document" - BellSouth Response

CLECs,

Attached is BellSouth's response to the CLEC's "Marked Up" CCP Document.

This document will be used in the discussion during the CCP Process Improvement meeting in Atlanta on December 7. This document is also referenced in change request - CR0151.

If you are planning to attend this meeting in person, please bring a copy with you. Also, please be aware that this document is marked up in color and the BellSouth responses are in "Orange".

If you have any questions, please let us know.

Thanks.

Change Control Team

---------- Distributed Message ----------

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
List Manager /m1,mail1a with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Tuesday, December 05, 2000 5:55 PM
To:
Subject: ID: "Marked Up CCP Document" - BellSouth Response

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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.

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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

			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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JMB-20
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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)

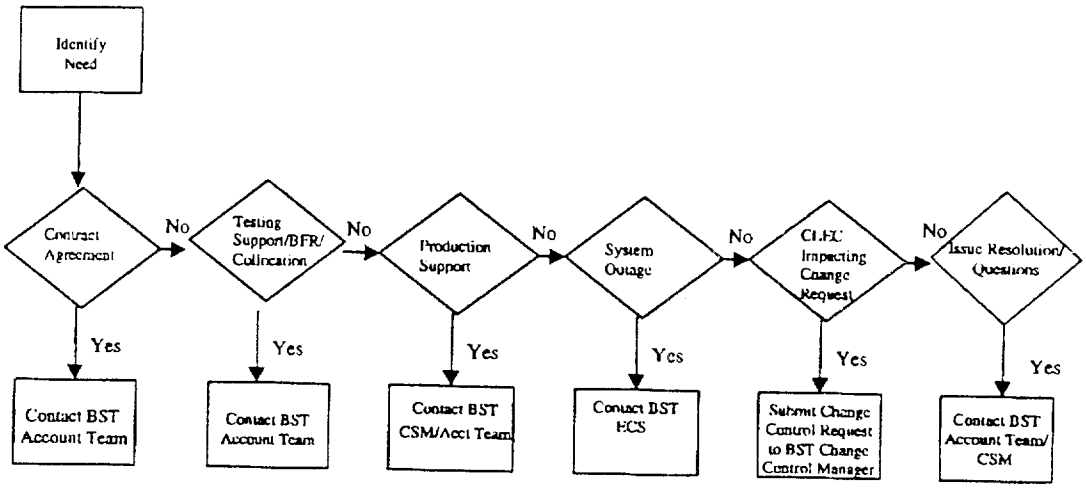
Type 6- CLEC Impacting Defects/~~Expedites~~.(Agree to Remove)

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.

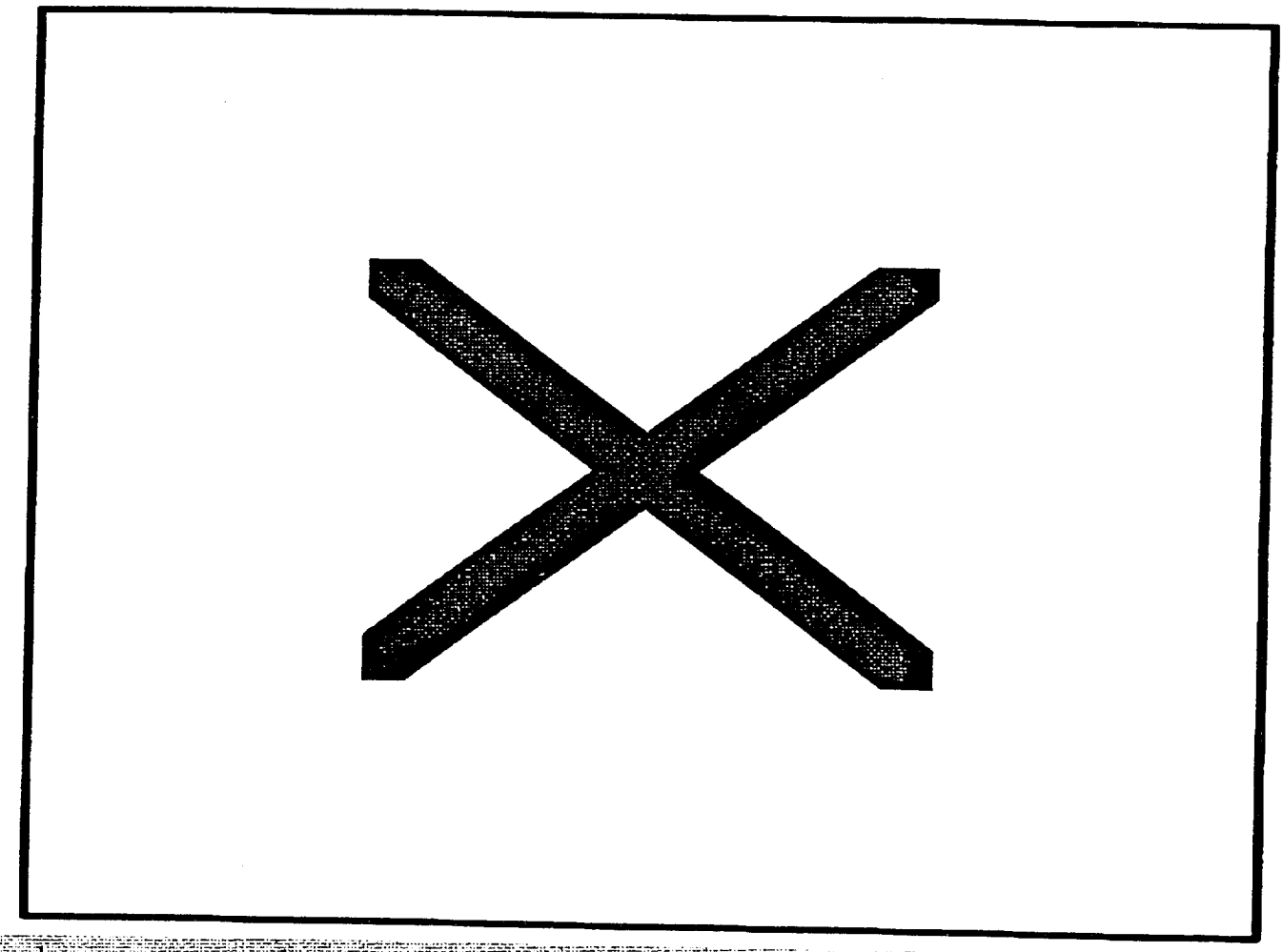


[No change was made to this figure, an error in the revision marking process resulted in its accidental modification/deletion.]

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.

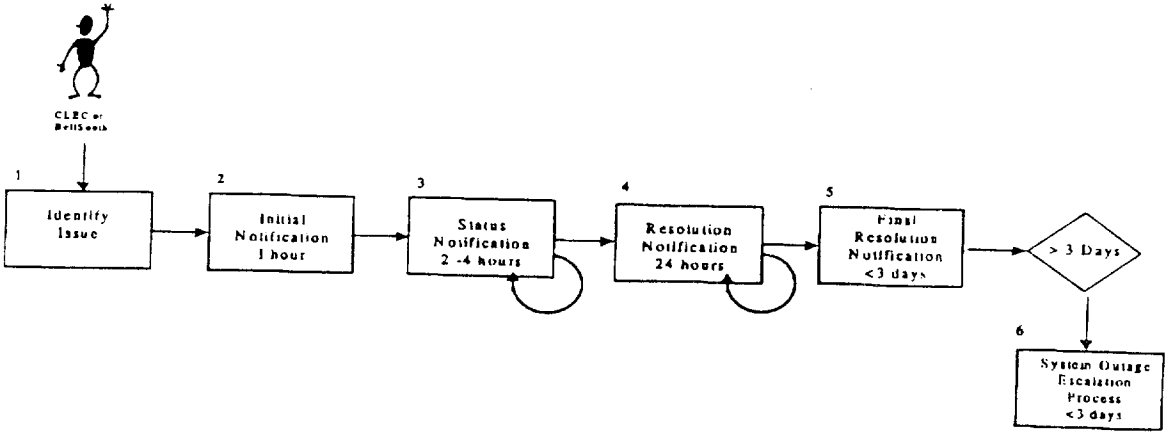


Figure: 4-2. Type 1 Process Flow

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.

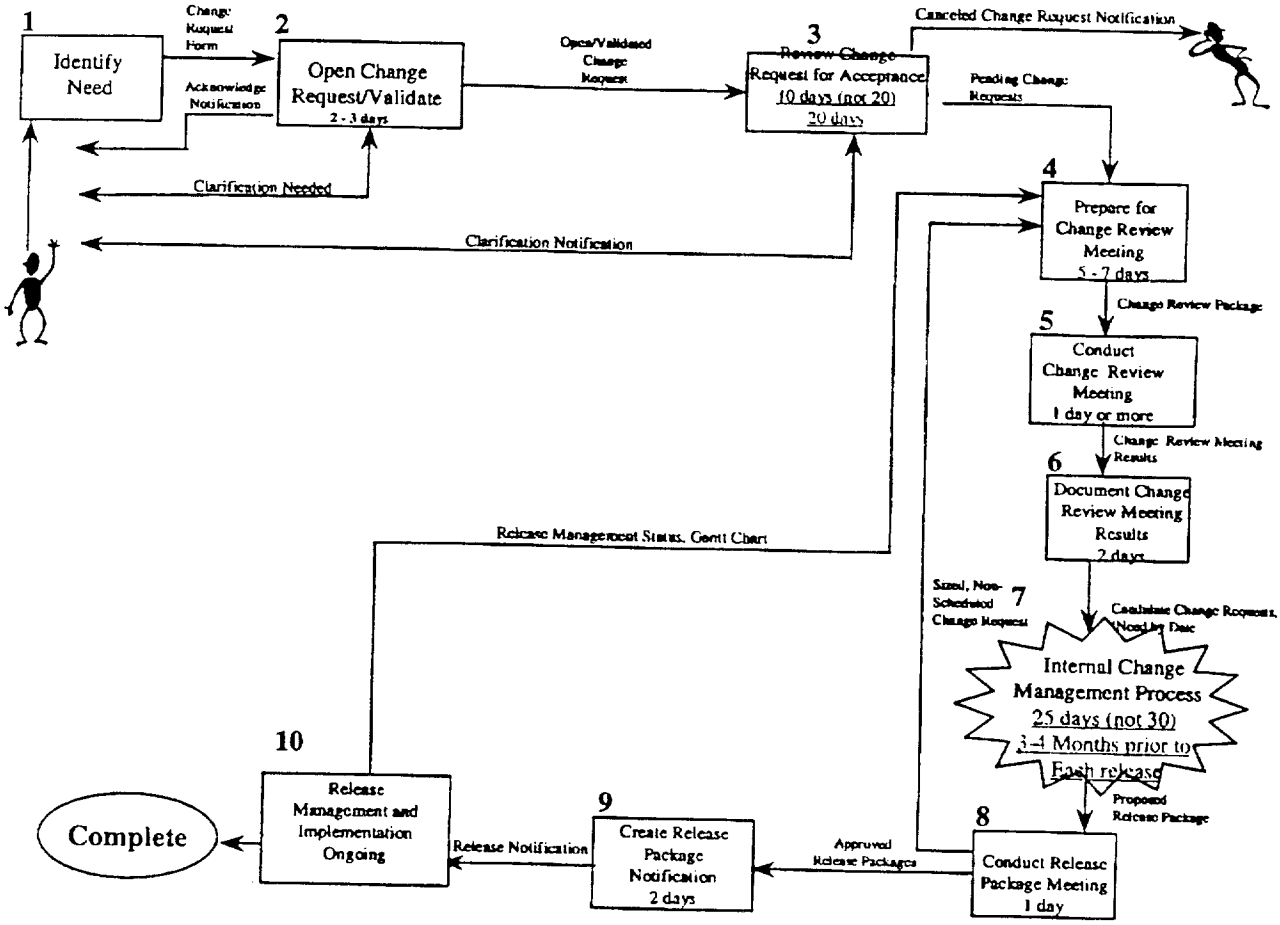


Figure 4-3. Change Control Process Flow

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	**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
		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. 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	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	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Specifications and 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 ~~3~~045 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	• Implemented Change Request • Draft User Requirements • Final User Requirements • Documentation Changes	

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		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 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.

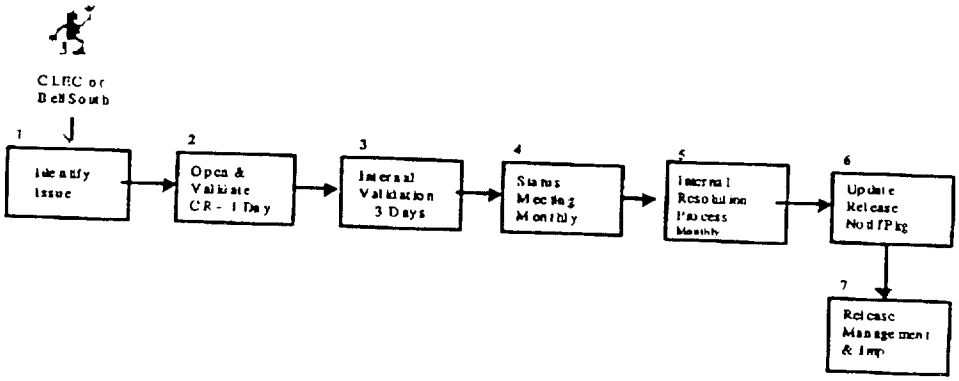


Figure 4-4. Type 2-5 Exception/Expedited Feature Process

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 email to the originator for review and	**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
		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.

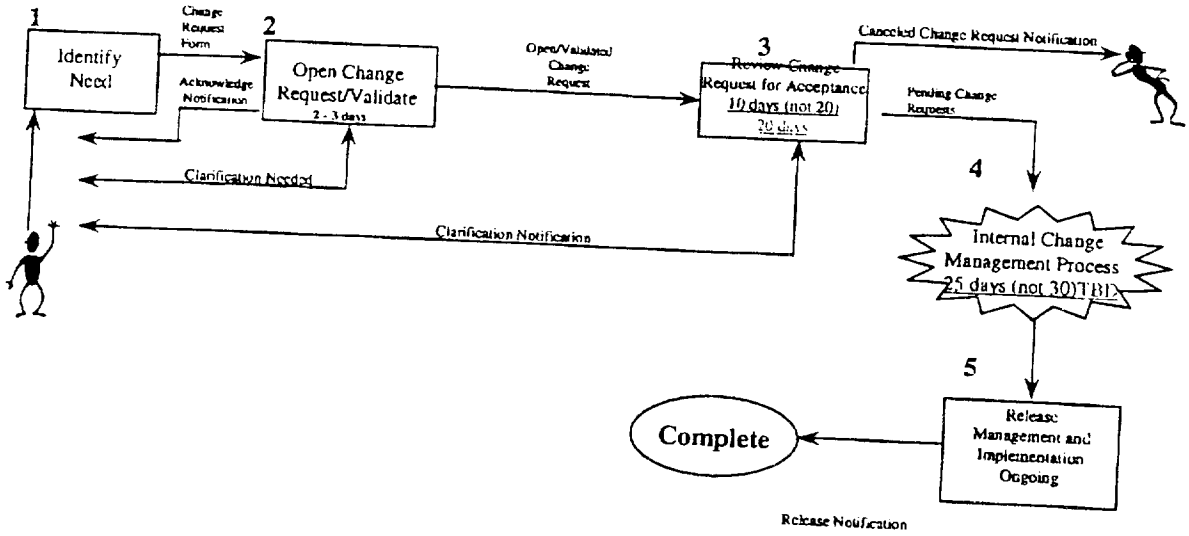


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

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**

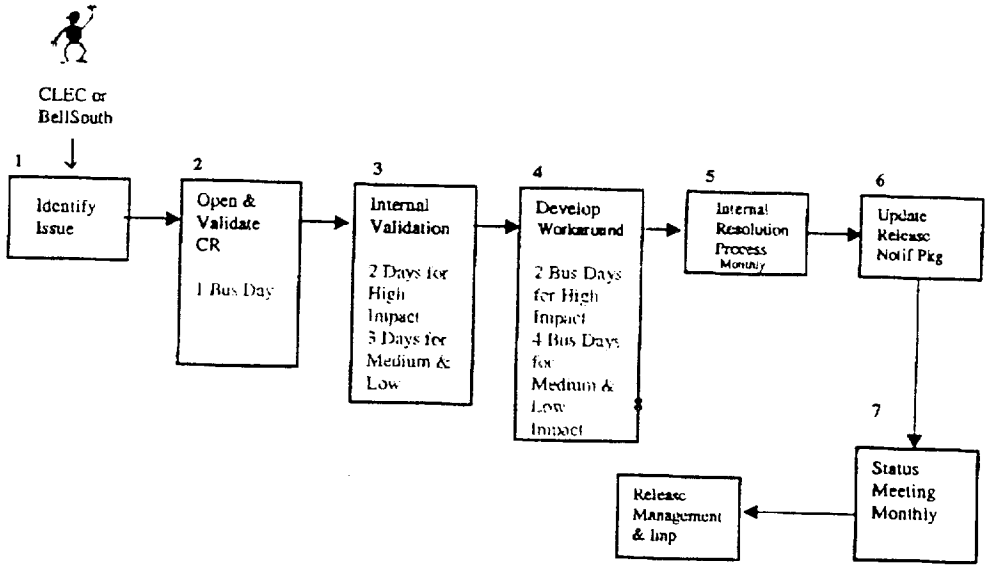
The failure causes impairment of critical system functions, though a workaround solution does exist.

- **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

DRAFT

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.~~ Validate that it is a defect/expedite. ~~2.~~ Perform internal defect/expedite analysis. ~~3.~~ 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 High Impact

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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.~~
56	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.

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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)
~~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". 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).

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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/iec.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.

BELLSOUTH

BellSouth Interconnection Services
Suite 200
1960 West Exchange Place
Tucker, GA 30084

AT&T Regional Account Team

770 492-7550
Fax 770 492-9412

December 1, 2000

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is in response to your e-mail dated November 21, 2000, requesting BellSouth to manually load information regarding another AT&T customer into the Calling Name (CNAM) database.

As you know, BellSouth has offered to provide AT&T and other CLECs with a mechanized process for inputting ported numbers information into BellSouth's CNAM database. BellSouth has offered this process at no charge. On October 20, 2000, you received from BellSouth the initial form necessary to initiate this process. Four days later, during a conference call between AT&T and BellSouth's CNAM subject matter experts, AT&T was advised that the process could probably be put in place between 4 – 6 weeks after AT&T completed and returned all the necessary forms to BellSouth.

I received the completed initial form from you on November 2, 2000. After making the corrections that I confirmed with you, I provided the corrected initial form to BellSouth's internal group responsible for CNAM interconnection. The next day, November 3, BellSouth contacted AT&T's designated representative and provided the second form that must be completed before BellSouth begins implementing this process. AT&T has yet to complete this second form and return it to BellSouth.

When BellSouth agreed to enter the Dillard's information manually into the BellSouth database, it was with the understanding that AT&T would expeditiously pursue the interim mechanized solution. Since then, AT&T has continued to acknowledge that it intends to pursue the interim mechanized solution. As you know, the interim solution is quicker and more efficient that manually inputting data into the CNAM database on a case-by-case basis. The process benefits AT&T's customers by automatically addressing the calling name delivery situation. I trust that AT&T is, in fact, diligently pursuing the completion of the form that will allow BellSouth to implement this mechanized solution, and I am requesting that AT&T return the completed second form to me by December 5, 2000. If AT&T cannot return this form to BellSouth by December 5, please let me know immediately.

Bradbury,J M (Jay) - LGA

From: Berger,Denise C - NCAM
Sent: Monday, October 30, 2000 10:45 AM
To: Jan.Burriss1@bridge.bellsouth.com
Cc: bob.bickerstaff@bridge.bellsouth.com; Sandra.Jones5@bridge.bellsouth.com; Leigh.Wilson@bridge.bellsouth.com
Subject: BellSouth Reassigning AT&T Ported Numbers

October 30, 2000

Jan Burriss
BellSouth Telecommunications, Inc.
1960 West Exchange Place
Suite 200
Tucker, Georgia 30084

RE: BellSouth Reassigning AT&T Ported Numbers

Dear Jan:

The purpose of this letter is to inform BellSouth that AT&T is still experiencing problems with BellSouth reassigning AT&T ported numbers. I am also asking for your assistance in insuring that BellSouth immediately put in place the necessary measures to

1. Identify affected AT&T customers
2. Provide immediate remedy to those customers
3. Implement a solution that will prevent this from happening in the future

Tropical Shipping in Riviera Beach, Florida, the first AT&T customer who experienced this, has been remedied. According to the memo I received last week from Sandra Jones, BellSouth discovered that the BellSouth order process requires an identification code with ported telephone numbers that indicates in the BellSouth databases that the numbers are assigned as ported and currently unavailable. In the case of Direct Inward Dialing (DID) service, each telephone number within the DID number block must carry the identification code. I now have three other customers affected by the same problem, two in Florida and one in Georgia.

1. Con-[redacted]

This customer originally ported to AT&T in August of 1999. The blocks of numbers assigned to Con-[redacted]. Numbers in this block are being reassigned by BellSouth to residence and small business customers. Numbers identified as reassigned to date are [redacted]. There may be others. The trouble was called in to the AT&T Maintenance Center and a ticket was opened. The AT&T Maintenance Center tried to call in a ticket to the BellSouth Maintenance Center, but was referred to the Account Team instead.

2. Wacke[redacted]

Gardens, FL 33418

I'm still gathering information on this customer's situation. The only number I've identified at present as having a problem is [redacted]

I have a third customer identified and as soon as I get information, I will forward it to you.

Denise C. Berger
District Manager-Local Supplier Performance
404/810-8644 (Voice)
404/810-8605 (Fax)
800 258-0000, PIN #2589558 (Pager)
deberger@att.com

BELLSOUTH

BellSouth Interconnection Services
Suite 200
1960 West Exchange Place
Tucker, GA 30084

AT&T Regional Account Team

770 492-7550
Fax 770 492-8412

November 17, 2000

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is in response to your e-mail dated October 30, 2000, regarding BellSouth's reassigning telephone numbers ported by AT&T. Your e-mail requests that BellSouth identify the affected AT&T end users, provide immediate remedy to those customers and put measures in place to prevent further occurrences. To date, five of AT&T's end users' telephone numbers have been reassigned to other BellSouth customers and those situations have been corrected.

The information provided to you by Sandra Jones is correct. In 1999, BellSouth identified the problem created by service orders without the identification code on ported numbers. In December 1999, BellSouth implemented an edit in its service order system to ensure that the codes are always placed on porting service orders. BellSouth also initiated an intensive effort between BellSouth's Local Carrier Service Center (LCSC) and Network organizations to identify ported telephone numbers that did not have the appropriate ported and unavailable identification code and to manually apply the needed code.

BellSouth's Direct Inward Dialing (DID) telephone numbers are not eligible for reassignment to new customers for a period of one year. The telephone numbers assigned to AT&T's five end users that were reassigned to new BellSouth customers were missed by BellSouth's efforts to identify ported telephone numbers without the ported code. After residing in BellSouth's assignment database for a year without the code, the telephone numbers were incorrectly assigned.

BellSouth regrets any problems that this situation may have caused AT&T and its end users. However, there is no further mechanism or feasible process that BellSouth can follow to identify additional DID telephone numbers ported by AT&T that are missing the ported code in BellSouth's database. All practicable steps have been taken and the potential impacts have been minimized. In the event other AT&T end users' telephone numbers are incorrectly reassigned, BellSouth has implemented an emergency procedure to expedite a resolution. Two LCSC managers have been assigned the primary responsibility for resolution of any end-user customer problems associated with this issue. Additionally, two service representatives have been designated to handle the specific tasks required by BellSouth to correct the problems. All LCSC managers and service representatives have been covered on the problem, and LCSC

management believes that this "task force" approach will provide the most expeditious handling of any future problems that may occur. The appropriate manager contacts are as follows:

Felicia Rainey	770-986-2690
Pat Hamlin	770-986-2125

If we need to discuss this issue further, please feel free to call me at 770 492-7590.

Sincerely,

Sandra Jones for

Jan Burriss

cc: Sandra Jones
Felicia Rainey
Pat Hamlin

-----Original Message-----
> From: Berger, Denise C, NCAM
> Sent: Wednesday, November 22, 2000 11:06 AM
> To: BST-Jan Flint (E-mail)
> Cc: BST-Jan Burriss (Business Fax); BST-Sandra Jones (E-mail)
> Subject: Another Number Reassignment
>
> November 22, 2000
>
> Jan Flint
> BellSouth Telecommunications
> 1960 West Exchange Place
> Suite 200
> Tucker, Georgia 30084
>
> RE: Automotive Controls
>
> Dear Jan:
>
> This message will confirm our conversation earlier this morning.
>
> We've had another complaint of customer's having numbers reassigned by BellSouth. Automotive Controls, TN 770-409-5092, was ported to AT&T on July 20, 1999. Yesterday, calls for this customer started terminating at a BellSouth residence customer. The BellSouth customer stated that he had recently been assigned the number by BellSouth.
>
> Please insure that this customer's problem is resolved today. As we discussed, if it is not resolved today, then the AT&T customer will likely be service impaired through the holiday weekend. I will look to have status from you as to the expected resolution by noon today.
>
> Thanks,
>
> Denise C. Berger
> District Manager-Local Supplier Performance
> 404/810-8644 (Voice)
> 404/810-8605 (Fax)
> 800 258-0000, PIN #2589558 (Pager)
> deberger@att.com
>

> -----Original Message-----
> From: Berger, Denise C, NCAM
> Sent: Wednesday, November 22, 2000 11:14 AM
> To: BST-Jan Burriss (E-mail)
> Subject: FW: Another Number Reassignment
>
> Jan,
>
> As you can see, we continue to have this problem. What action will BellSouth take to proactively find customer's in jeopardy before their service is disrupted?
>
> In your letter to me dated November 17, 2000, you stated that "there is no further mechanism or feasible process that BellSouth can follow to identify additional DID telephone numbers ported by AT&T that are missing the ported code in BellSouth's databases."
>
> I am respectfully requesting that BellSouth capture all orders placed by AT&T prior to December of 1999 to port DID numbers. This presumably will collect the universe of orders in jeopardy. I am then requesting that BellSouth go in to its databases on all of these orders to determine which ones have been reassigned to the available number pool and mark them as ported to AT&T and therefore unavailable.
>
> The last instance of this that was referred to BellSouth took the majority of one business day to resolve. It is only right that BellSouth should take all possible steps to insure that no more AT&T customers are impaired due to this BellSouth problem.
>
> I look forward to your response.
>
> Denise C. Berger
> District Manager-Local Supplier Performance
> 404/810-8644 (Voice)
> 404/810-8605 (Fax)
> 800 258-0000, PIN #2589558 (Pager)
> deberger@att.com

BELLSOUTH

BellSouth Interconnection Services
Suite 200
1960 West Exchange Place
Tucker, GA 30084

AT&T Regional Account Team

770 492-7550
Fax 770 492-9412

December 4, 2000

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is in response to your email of November 22, 2000 to Jan Burriss regarding the reassignment of numbers and, specifically, your request for BellSouth to capture all orders placed by AT&T prior to December 1999 to port Direct Inward Dialing (DID) numbers.

BellSouth Subject Matter Experts have reviewed your request for BellSouth to capture all orders to port DID numbers placed by AT&T prior to December, 1999 and to compare those numbers to the BellSouth databases to proactively identify additional "reassigned" telephone numbers. As Jan Burriss stated in her letter to you dated November 17, 2000, BellSouth implemented an intense telephone number review process in December 1999. This process allowed BellSouth to identify and correct the majority of the numbers that lacked the appropriate identification code. Unfortunately, as AT&T has experienced, the effort did not capture all such numbers.

To implement a solution, such as you outlined, could take several months of Information Technology (IT) development. By the time this is accomplished, the window of opportunity for this error will be closed. The edit to identify this error was implemented in December 1999. Therefore, the opportunity for a telephone number incorrectly remaining and available for assignment in BellSouth's number assignment database (ATLAS) continues to decline. Additionally, the occurrence of the problem relative to the total DID numbers ported is not significant. Based on the above, BellSouth will continue to handle these instances on a case—by-case basis.

If you have questions, please call me at 770-492-7558.

Sincerely,

Sandra C. Jones

Sandra C. Jones
Sales Director – AT&T Account Team

CC: Greg Terry
Jan Burriss
Bob Bickerstaff

-----Original Message-----
> From: Williamson, Jill R, NCAM
> Sent: Monday, July 24, 2000 10:23 AM
> To: 'Change.Control@bridge.bellsouth.com'
> Cc: 'Annette.Cook@espire.net'; 'sharon.arnett@mail.sprint.com';
> 'bszafran@covad.com'; 'Tyra.Colbert@wcom.com';
> 'sandra.k.evans@mail.sprint.com'; 'jnovo@mpowercom.com';
> 'Katherine.Hudler@espire.net'; 'kschwart@covad.com';
'lchase@covad.com';
> 'mubeen@nightfire.com'; 'prehm@nightfire.com'; 'smurray@rhythms.net';
> 'tyra.colbert@wcom.com'; 'Yvette.Brown@espire.net'; 'Judy Novo'
> Subject: CLEC input on the Change Control Process
> Importance: High
>
> Change Control Team,
>
> We held a meeting last Thursday to discuss our concerns with the Interim Change Control Process (I-CCP) and would like to share those concerns with you prior to our status meeting on Wednesday. Our expectation is that BellSouth will come to the meeting prepared to address these issues and will bring the appropriate decision makers/SMEs to the meeting.
>
> The main issues that must be addressed include:
>
> * Defect/Expedited Feature Process - This piece of the process continues to be a big concern for us. We must have severity levels and associated response time for requests we consider to be urgent or outside a new functionality request. We propose you change the title of Type 6 requests so that it represents requests that the CLECs would consider defects or emergency changes, i.e., what BellSouth includes in defects and the expedited feature process. Within this category, there should be three levels of priority, representing varying levels of impact to the CLECs. Each level of priority would have corresponding response times, again based on the level of severity.
>
> * Documentation "Defects" - Missing or incorrect documentation should go through the Type 6 category and should be prioritized based on the degree of discrepancy and/or impacts to the CLECs ability to do business with BellSouth. Also, when a documentation defect is identified by either BellSouth or a CLEC, BellSouth should immediately send a notification to the CLECs advising them of the discrepancy.
>
> * Rejected Change Requests - Requests that are rejected by BellSouth remain in the "new" status and under the current process never get addressed. We need to modify the process so that requests BellSouth cannot or is unwilling to support are addressed. When BellSouth rejects a request, a conference call should be scheduled with the CLECs and BellSouth's SMEs (could be our monthly meeting) to present the issue, discuss BellSouth's reason for rejecting the request and to develop options for resolving the issue.
>
> * SME/Decision Maker Participation - BellSouth must ensure that the appropriate SMEs or decision makers are present at all Change Control meetings to address issues with and provide expertise to the CLECs.
>

> * In addition to the rules around documentation releases, we need to add guidelines for system impacting releases. These guidelines will vary depending on the size of the release, but we should create a couple of categories. For example, when BellSouth implements a point release, BellSouth should provide documentation at least 60 days in advance and allow for testing up to 30 days in advance of the release. Also, anytime BellSouth plans to update CLEC documentation, the Change Control Team should be given advance notice of the update and detail of the changes.
>
> * The language around Retirement of Interfaces needs to be slightly > modified. While we agree that the Retirement of Interfaces does not need to go through the voting/prioritization process, notification of the retirement should go through Change Control.
>
> Steve Murray Tyra Colbert-Hush Steve Brown
> Rhythms WCOM Covad
>
> Jill Williamson Mubeen Saifullah Sandy Evans
> AT&T Peggy Rehm Sprint
> Nightfire
>
> Yvette Brown Judy Novo
> espire Communications Mpower Communications
>

November 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the initial interview of BellSouth personnel for CLEC Training (PPR4).

Exception:

BellSouth does not have documented procedures for CLEC training management practices and program administration. (PPR4)

Background:

The *BellSouth Start-Up Guide*[1] states:

- BellSouth offers training courses to CLECs to help them interface efficiently with BellSouth. The classes are designed to aid the CLEC's understanding of the CLEC/BellSouth relationship and the procedures and services involved.

BellSouth Professional Training Services personnel[2] state:

- The objective of the CLEC Training function is to provide quality training in order for CLECs to be able to process orders manually and/or to utilize the Operational Support System (OSS).

Issue:

During interviews with members of BellSouth Professional Training Services, KPMG Consulting found that BellSouth does not have documentation for the following items:

1. Descriptions of the roles and responsibilities of the Senior Manager in charge of Professional Training Services and the Professional Training Services Coordinator.

2. Procedures defining the scope and objectives of the training process.

3. Procedures for accepting CLEC input regarding training curriculum.

4. Procedures for publishing information about training opportunities.

[1] The Bell-South Start-Up Guide is located at http://www.interconnection.bellsouth.com/guides/activation/pdf/startup2.pdf, Version 1.1, 7/27/2000, Section 9.0, page 97.
[2] Initial Interview of Professional Training Services personnel conducted 9/20/2000.

5. Procedures for addressing errors and exceptions in training events and materials.

6. Procedures to monitor and ensure the quality of training, which include:

    a. Surveying training recipients on the effectiveness of training.

    b. Responding to feedback about training quality.

    c. Monitoring instructor performance.

7. Procedures to track utilization and attendance of training tools and forums.

8. Procedures to ensure that training offerings are scalable in response to additional demand.

Without clear and complete documentation of operating procedures, BellSouth cannot ensure consistency and repeatability of the training process.

Impact:

CLECs may experience inconsistent levels of training or training support from BellSouth Professional Training Services. The lack of a consistent and repeatable process could impede the ability of CLECs to effectively train their staff and ultimately impact the quality of service provided to their customers.

BELLSOUTH

FL OSS TEST
Exception #9

December 5, 2000

EXCEPTION REPORT

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Background:

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3. Procedures for accepting CLEC input regarding training curriculum.

4. Procedures for publishing information about training opportunities.

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Impact:

CLECs may experience inconsistent levels of training or training support from BellSouth Professional Training Services. The lack of a consistent and repeatable process could impede the ability of CLECs to effectively train their staff and ultimately impact the quality of service provided to their customers.

BellSouth Response:

We have established Methods and Procedures for all of the above items stated. These M&Ps are provided as a separate document.

Documentation Procedures for CLEC Training Management Practices

Question: Roles and responsibilities of the Senior Manager in charge of Professional Training Services and the Professional Training Services Coordinator.	
Step	Action
1	Hiring all Instructional Designers and Trainers for CLEC training.
2	Tracking and measuring all revenue and expense for Professional training Services.
3	Measuring return on investment.
4	Measuring demand for classes and filling that demand.
5	Measuring results of pre and posttests.
6	Taking CLEC input and making sure that suggestions and improvements are implemented in the training classes.
7	Tracking instructor evaluations and pre and post tests via Access.
8	As new procedures and software are implemented Training Coordinator ensures that training material is modified accordingly or new classes are added to accommodate for the new procedures.

Question: Scope and objectives of the training process	
Step	Action
1	To provide quality training in order for CLECs to be able to process orders manually and/or utilize the Operational Support System (OSS).
2	Train all CLECs who we identify in the market place to help them be able to interface efficiently with BellSouth.
3	Aid the CLEC's understanding of the CLEC/BellSouth relationship and the procedures and services involved.
4	Define volume and term training deals.
5	Set up web based and instructor lead classes for those new CLECs entering into the market place.
6	Design classes to make the CLEC a better more capable competitor in the market place.
7	Share BellSouth knowledge and know how with the CLEC community.

Question: Procedures for accepting CLEC input regarding the training curriculum	
Step	Action
1	CLEC Inforum-CLECs asked to fill out cards asking for their ideas on improvements and for suggestions on classes we need to add or modify.
2	Instructor evaluations are given at the end of each training class asking CLECs to rate the class on specific measures and give their input on pre-determined questions. These evaluations are read by instructors and Senior Manager and results are put into a database.
3	Ongoing Return on Investment studies are conducted where CLECs are called by phone and asked for their opinions and input.
4	Attendance at several CLEC trade shows to provide information on our program as well as receive information for improvements and new ideas for the CLEC community.

Question: Procedures for publishing information about training opportunities	
Step	Action
1	All CLEC classes are published on the web. This includes class description, available dates, and pricing.
2	Literature is produced that describes each class in detail stating specific course objectives, time frames, and pricing.
3	CLEC Inforum is done twice a year to educate CLECs on services that we offer and new enhancements in doing business with BellSouth.
4	The web is kept current with class offerings and web-based classes.
5	Send out flyers when new classes are established.
6	Interviews and articles are done in our CLEC quarterly.

Question: Procedures for addressing errors and exceptions in training events and materials	
Step	Action
1	Instructional Designers make any necessary changes to the training material including correcting errors and making updates.
2	SME's review all documentation before it is put into training material and taught in the classroom.
3	Regulatory issues and any requests for future directives are many times fielded by the Training Coordinator who then passes them on to the proper instructor or if needed the Manager of Professional Services

Question: Procedures for monitoring and ensuring the quality of training which include: • surveying training recipients on the effectiveness of training • responding to feedback about training quality • monitoring instructor performance	
Step	Action
1	Level One evaluations asking for input on material, classroom and instructor are handed out at the end of each class. These are then read by instructor and keyed into a database.
2	Pre and posttests are given at the beginning and end of each class to specifically measure the amount of participant learning that occurred. These pre and posttests are then averaged for each class and average pre and posttest measures are tracked in our database.
3	Training Coordinator can tell by these pre and posttest score averages for each class if there are problems that need to be addressed. If these scores are not consistent with past averages instructor evaluations are looked at even more closely to help determine what the problem is so it can be corrected.
4	Pre and posttests along with instructor/class evaluations greatly aid in helping us make decisions about what new developments and new customer markets need to be addressed in training. They also help us determine if training is meeting the CLECs needs in the field.
5	Training coordinator occasionally sits in on the classroom and measures effectiveness of materials and trainer.

Question: Procedures to track utilization of training tools and attendance at forums	
Step	Action
1	Information for registration is found on the web and the CLEC then calls the Training Administrator to register for their desired class.
2	If there are not enough students signed up for a class or if a class has to be cancelled, these participants are called personally and reassigned to another class date.
3	Instructor receives a print out of all that signed up for their particular class. Instructor takes attendance and the actual attendee's names are sent back to the training coordinator.
4	At the CLEC Inforum participants are requested to give feedback on classes they would like to see offered or any feedback or suggestions for improvement that they would like to see implemented. Attendance at these inforums is kept and CLECs are invited back for subsequent ones in the future.
5	As on January 1, 2001, TAFI, LENS, and CLEC Basic will be offered via the web. For these specific classes, CLECs can register and complete courses via the web and not be required to interact with our Training Coordinator.

Question: Procedures to ensure that training offerings are scalable in response to additional demand	
Step	Action
1	Demand and attendance records are kept by the Training Coordinator. If a class fills up quickly, then others are added according to demand.
2	The number of requests determines demand. For instance, at the CLEC Inforum we get feedback requesting us to focus on the development of specific areas.
3	Instructors receive feedback in the classroom and while suitcasing classes at customer locations. Decisions for new development are many times based on this feedback

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.

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JMB-26
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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.

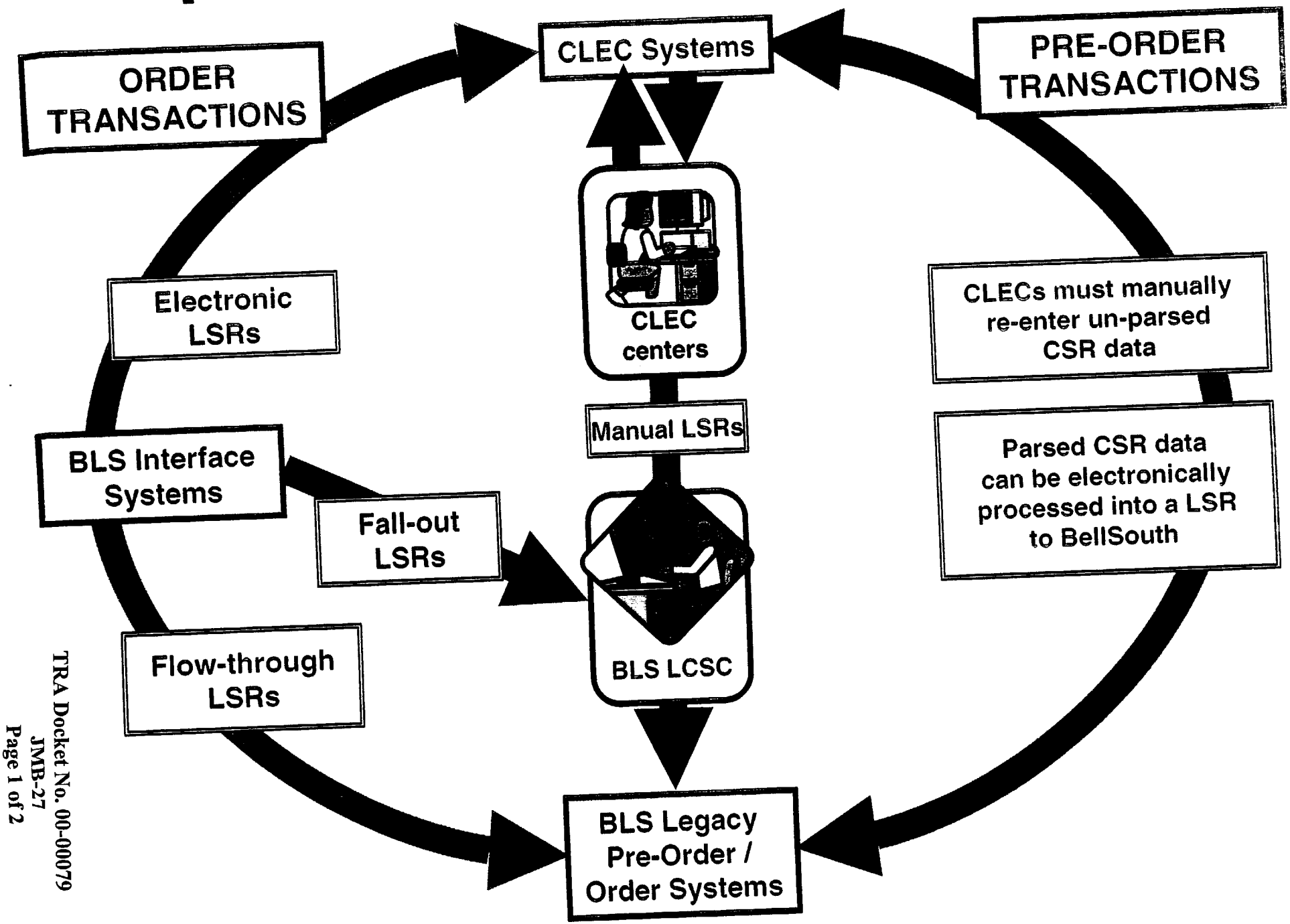
8) Owner: BellSouth (OPEN)
EDI0812990003 – CLECs requested better understanding of why 411 drops are occurring.
Status: If a CLEC's end user listing is dropped from Directory Assistance, the CLEC should call the LCSC. If BellSouth is at fault, no additional LSR is required from the CLEC. The listing 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.

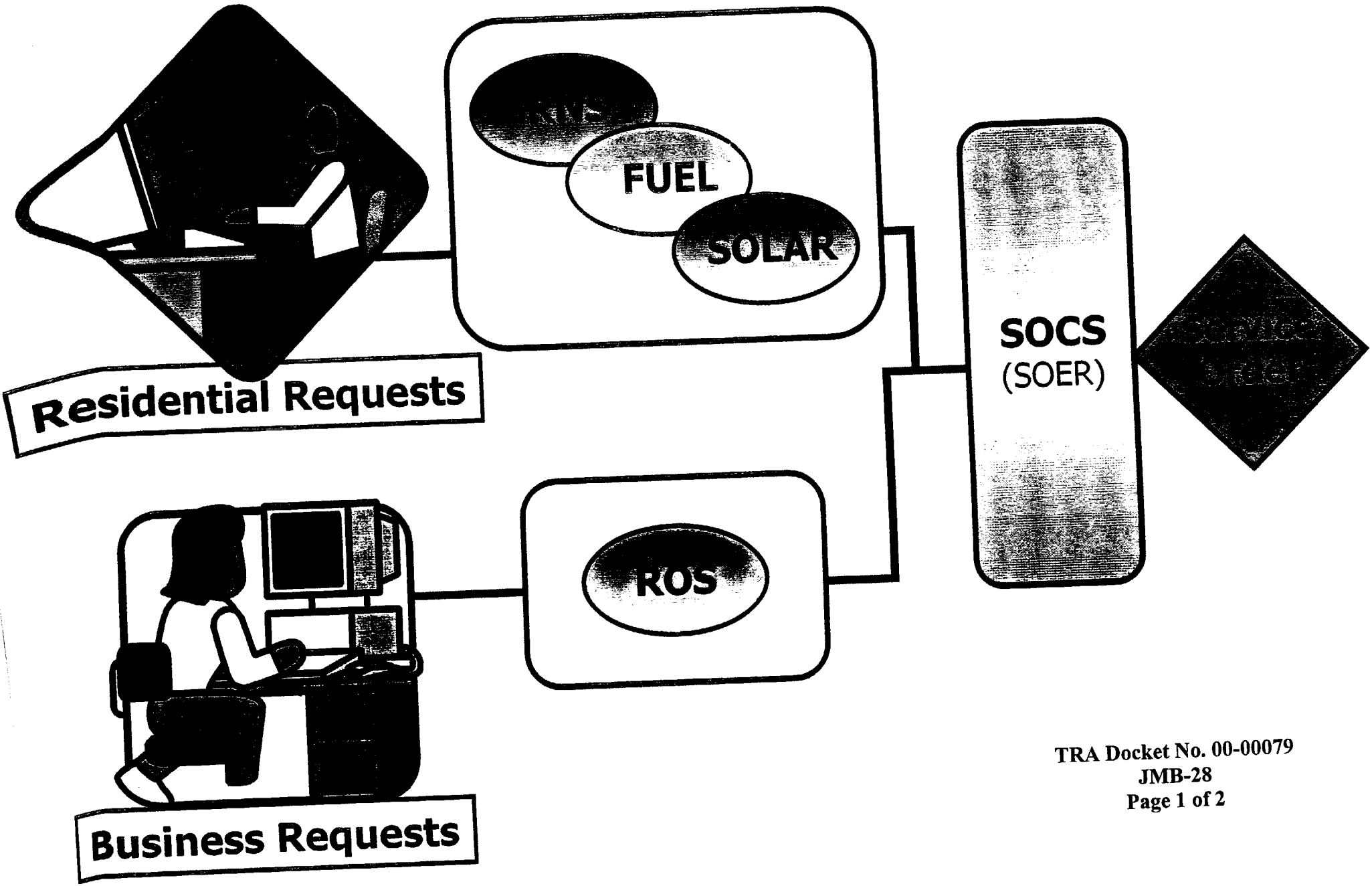
New Change Requests (Types 2-5)	ORD030200_001 – UNE via ASR21 *Status*: See Action Items. Jill (AT&T) and Tyra (WorldCom) will advise Change Control how they would like to pursue with this request. ORD032700_001 – Post-FOC Clarification *Status:* Conference call to be scheduled in August to discuss further.

Equivalent ordering functionality



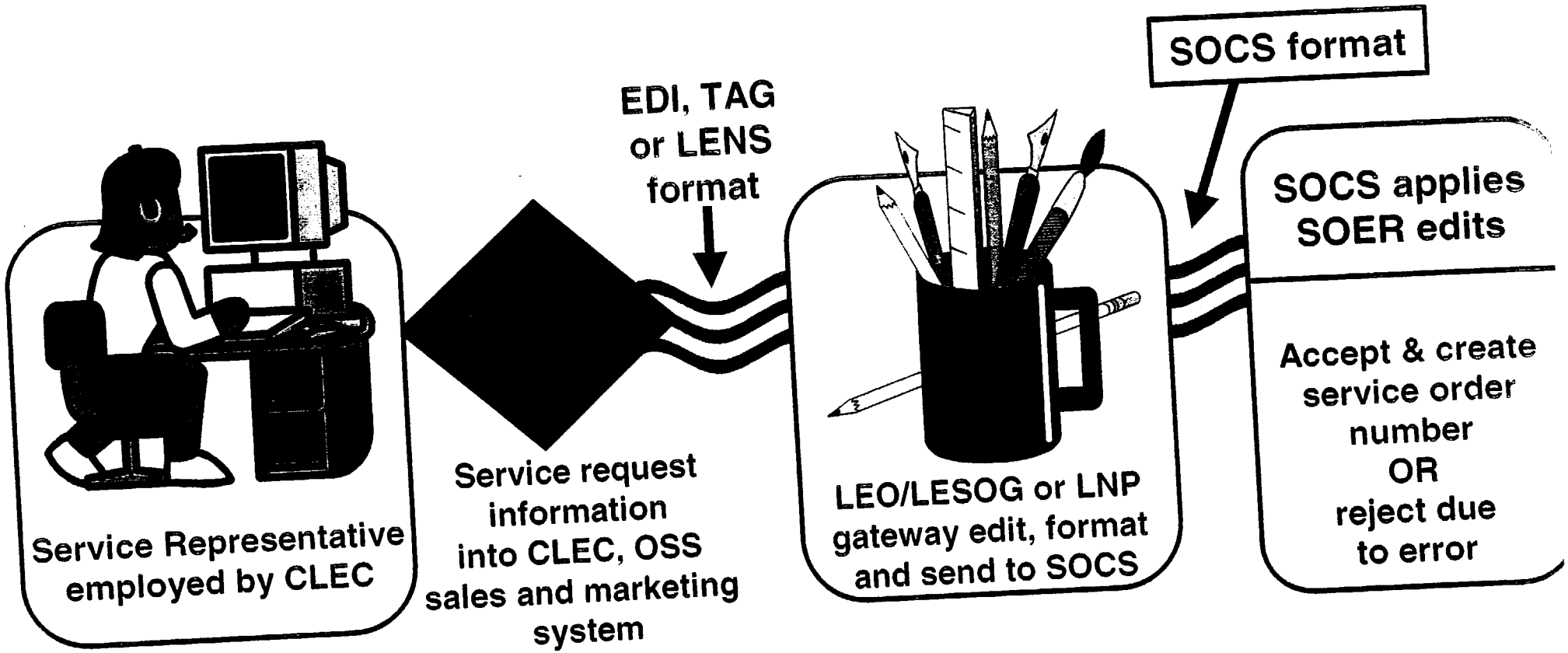
BellSouth ordering methodology

All BellSouth service requests are capable of flow-through



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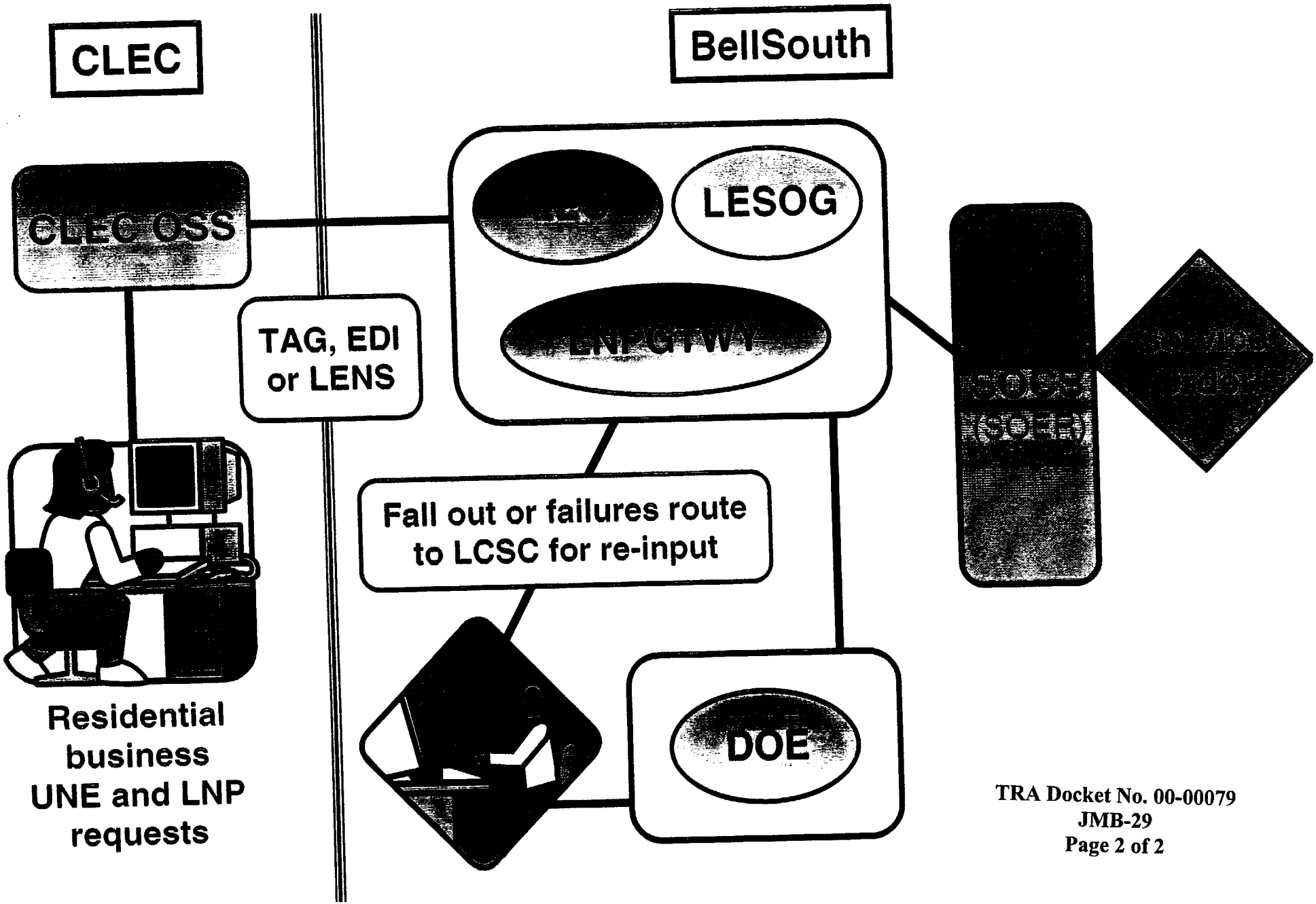
How CLEC service requests become service orders



Service orders for CLECs do not exist until acceptance by SOCS

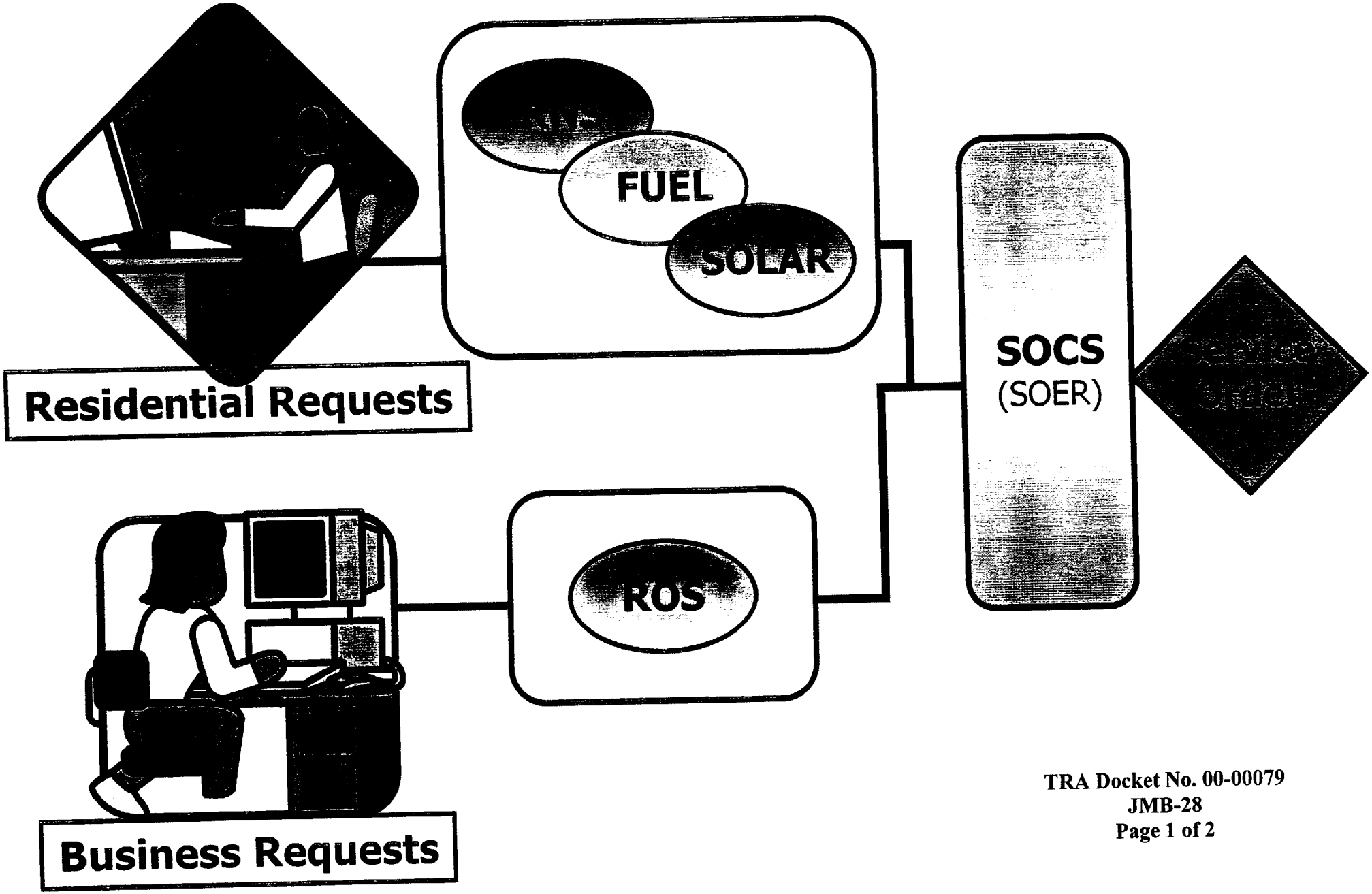
CLEC ordering methodology

Only some CLP service requests are capable of flow-through



BellSouth ordering methodology

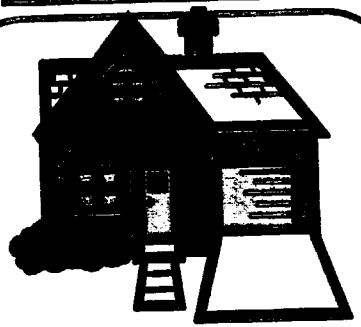
All BellSouth service requests are capable of flow-through



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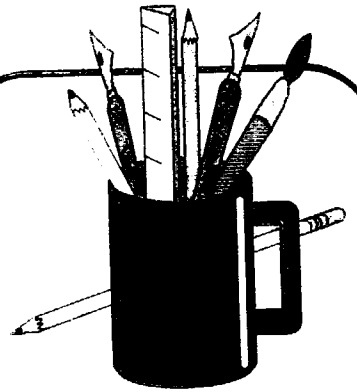
How BellSouth service requests become service orders

Residence



BellSouth residence Service representative

Service request information into RNS sales and marketing system



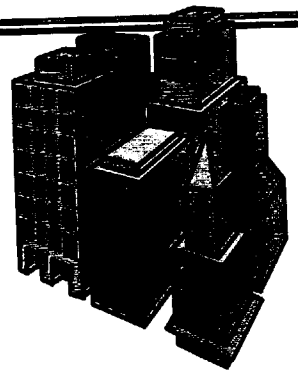
FUEL/SOLAR edits, formats and sends to SOCS

SOCS format

SOCS applies SOER edits

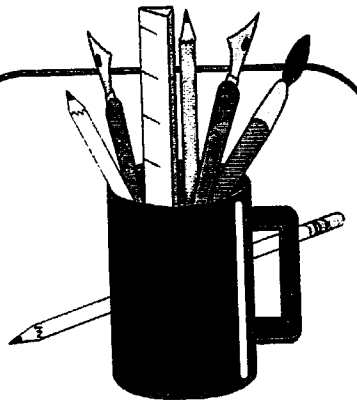
Accept & create service order number OR reject due to error

Business



BellSouth business Service representative

Service request information into ROS sales & marketing system



ROS edits, formats and sends to SOCS

SOCS format

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JMB-28
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Service orders for BLS do not exist until acceptance by SOCS

LNP FLOW-THROUGH DATA

	May-TAG	May-EDI	Jun-TAG	Jun-EDI	Jul-TAG	Jul-EDI	Aug-TAG	Aug-EDI	Sep-TAG	Sep-EDI	Oct-TAG	Oct-EDI
Total Mech LSRs	1206	5263	2509	6688	2015	6025	1646	9153	441	13285	2229	18571
Manual Fall Out	734	2093	1124	2795	1051	2286	720	2991	258	3436	1079	4832
Validated LSRs	382	3071	1289	3652	915	3554	894	5552	171	9355	1074	13085
BellSouth Caused System Failure	122	1437	247	1608	177	1484	334	2768	157	5247	574	6876
Flow Through Issued SOs	130	1152	654	1657	452	1666	376	2249	3	3507	441	5819
% Manual Fallout - LSRs	61%	40%	45%	42%	52%	38%	44%	33%	59%	26%	48%	26%
% BellSouth System Failure - LSRs	10%	27%	10%	24%	9%	25%	20%	30%	36%	39%	26%	37%
% BellSouth System Failure - VLSRs	32%	47%	19%	44%	19%	42%	37%	50%	92%	56%	53%	53%
% Total BellSouth Fallout + Failure - LSRs	71%	67%	55%	66%	61%	63%	64%	63%	94%	65%	74%	63%
% Maximum One-Touch CLP Orders	29%	33%	45%	33%	39%	37%	36%	37%	6%	35%	26%	38%

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JMB-30
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UNE FLOW-THROUGH DATA

	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI	Oct-LENS	Oct-TAG	Oct-EDI
Total Mech LSRs	2219	15053	1901	2082	45123	2630	5421	36221	1988	7958	36853	3085	7879	28781	1423	9930	58758	3050
Manual Fall Out	370	2794	702	491	6676	695	973	7080	808	1538	5728	1059	1824	6071	1091	1975	10736	1742
Validated LSRs	1703	10024	895	1302	33651	1637	3282	23855	962	4597	25974	1767	5130	18784	128	6212	39020	961
BellSouth Caused System Failure	475	1882	430	469	6872	635	1150	5070	373	1796	6206	191	1718	4099	76	1884	8974	110
Flow Through Issued SOs	828	6838	265	578	24121	894	1799	15176	524	2355	17968	1525	3130	13661	27	3915	28187	766
% Manual Fallout - LSRs	17%	19%	37%	24%	15%	26%	18%	20%	41%	19%	16%	34%	23%	21%	77%	20%	18%	57%
% BellSouth System Failure - LSRs	21%	13%	23%	23%	15%	24%	21%	14%	19%	23%	17%	6%	22%	14%	5%	19%	15%	4%
% BellSouth System Failure - VLSRs	28%	19%	48%	36%	20%	39%	35%	21%	39%	39%	24%	11%	33%	22%	59%	30%	23%	11%
% Total BellSouth Fallout + Failure - LSRs	38%	31%	60%	46%	30%	51%	39%	34%	59%	42%	32%	41%	45%	35%	82%	39%	34%	61%
% Maximum One-Touch CLP Orders	62%	69%	40%	54%	70%	49%	61%	66%	41%	58%	68%	59%	55%	65%	18%	61%	66%	39%

BUSINESS FLOW-THROUGH DATA

	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI	Oct-LENS	Oct-TAG	Oct-EDI
Total Mech LSRs	6524	2015	1360	6739	2427	1250	6702	2224	1079	10438	1182	1619	9168	1056	1221	10826	1180	1644
Manual Fall Out	1367	1055	799	1175	1343	764	1312	1105	658	2059	476	970	2207	442	727	2676	500	1083
Validated LSRs	4304	756	446	4460	725	403	4447	861	328	6762	539	539	5725	463	403	6808	445	447
BellSouth Caused System Failure	1409	220	185	1413	225	134	1331	169	141	2552	164	224	2199	138	122	2440	128	113
Flow Through Issued SOs	2424	413	214	2647	398	241	2747	422	147	3605	312	256	3171	299	240	3855	257	250
% Manual Fallout - LSRs	21%	52%	59%	17%	55%	61%	20%	50%	61%	20%	40%	60%	24%	42%	60%	25%	42%	66%
% BellSouth System Failure - LSRs	22%	11%	14%	21%	9%	11%	20%	8%	13%	24%	14%	14%	24%	13%	10%	23%	11%	7%
% BellSouth System Failure - VLSRs	33%	29%	41%	32%	31%	33%	30%	20%	43%	38%	30%	42%	38%	30%	30%	36%	29%	25%
% Total BellSouth Fallout + Failure - LSRs	43%	63%	72%	38%	65%	72%	39%	57%	74%	44%	54%	74%	48%	55%	70%	47%	53%	73%
% Maximum One-Touch CLP Orders	57%	37%	28%	62%	35%	28%	61%	43%	26%	56%	47%	26%	52%	45%	30%	53%	47%	27%

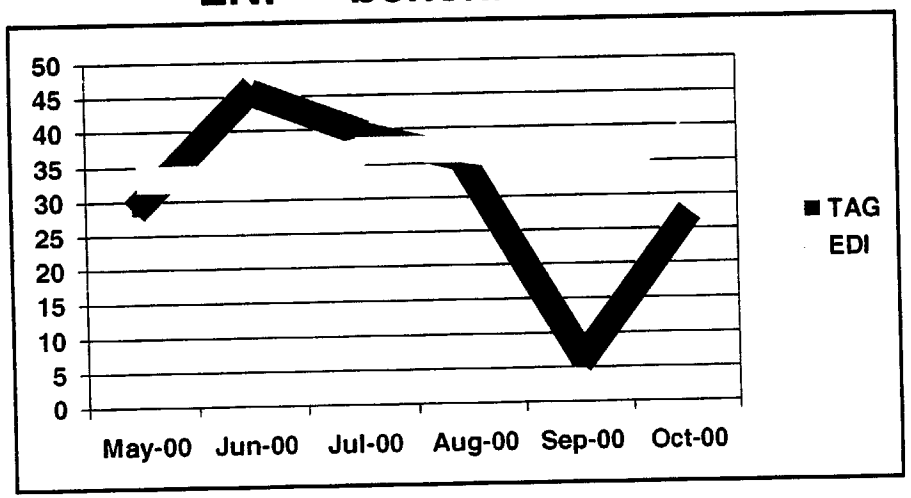
RESIDENCE FLOW-THROUGH DATA

	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI	Oct-LENS	Oct-TAG	Oct-EDI
Total Mech LSRs	139160	58350	3076	145667	61459	3992	136989	57961	4520	165707	57865	7036	151901	47810	7142	166029	65976	7641
Manual Fall Out	7806	1366	230	9704	1959	284	8162	1537	449	13833	4062	442	11595	1488	365	10619	2099	453
Validated LSRs	121868	54592	2535	125300	56223	3233	118230	52030	3624	135162	49185	5445	126148	42279	5643	140390	56601	5394
BellSouth Caused System Failure	9170	2235	582	9238	2352	801	7965	1799	798	13818	2042	1772	11242	1522	2121	10122	1433	2202
Flow Through Issued SOs	110029	51353	1817	113640	52909	2223	108205	49208	2578	119378	46469	3261	113417	40432	2986	127012	53734	2755
% Manual Fallout - LSRs	6%	2%	7%	7%	3%	7%	6%	3%	10%	8%	7%	6%	8%	3%	5%	6%	3%	6%
% BellSouth System Failure - LSRs	7%	4%	19%	6%	4%	20%	6%	3%	18%	8%	4%	25%	7%	3%	30%	6%	2%	29%
% BellSouth System Failure - VLSRs	8%	4%	23%	7%	4%	25%	7%	3%	22%	10%	4%	33%	9%	4%	38%	7%	3%	41%
% Total BellSouth Fallout + Failure - LSRs	12%	6%	26%	13%	7%	27%	12%	6%	28%	17%	11%	31%	15%	6%	35%	12%	5%	35%
% Maximum One-Touch CLP Orders	88%	94%	74%	87%	93%	73%	88%	94%	72%	83%	89%	69%	85%	94%	65%	88%	95%	65%

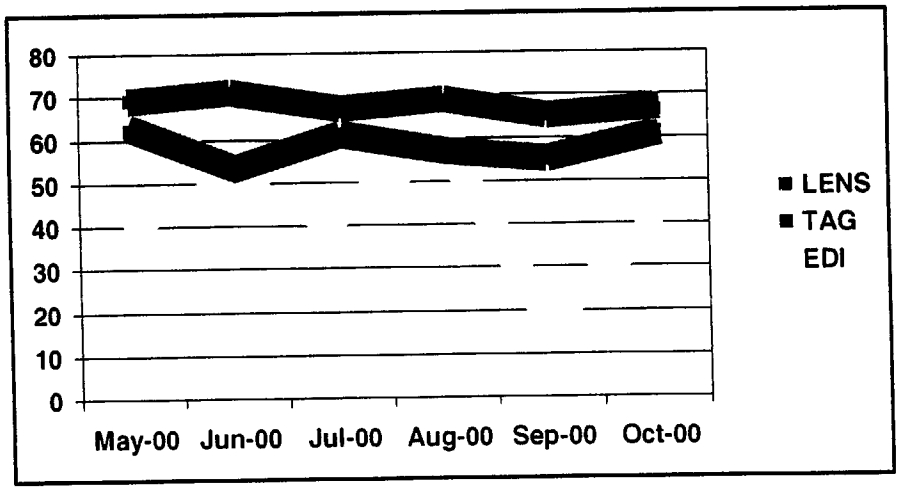
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Percent maximum flow-through CLEC orders

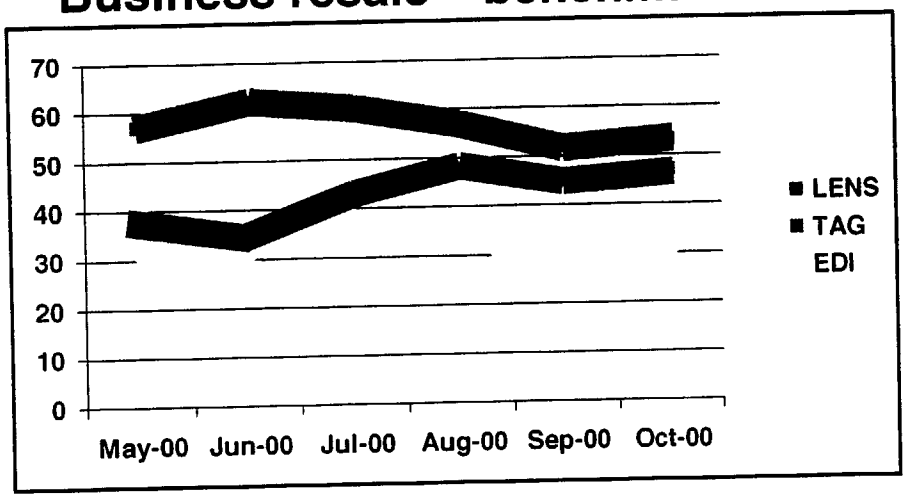
LNP – benchmark 85%



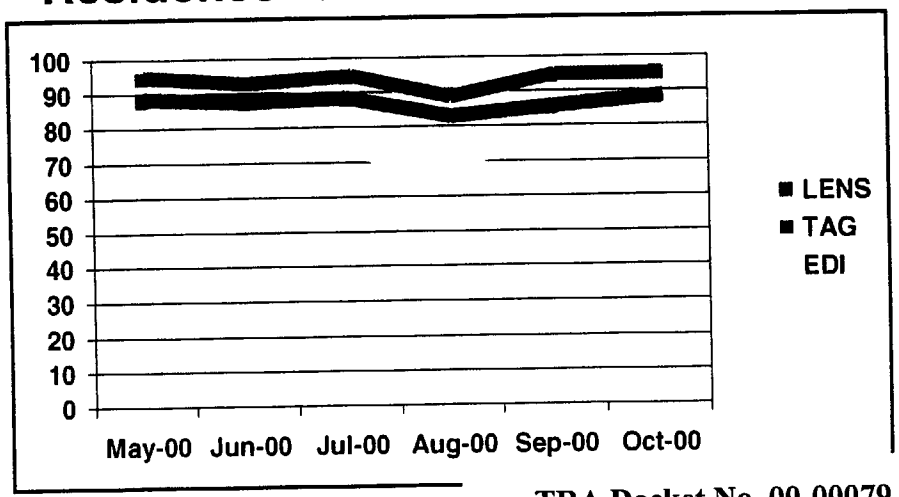
UNE – benchmark 85%



Business resale – benchmark 90%



Residence resale – benchmark 95%



Percent maximum flow-through CLEC orders

Type	Interface/ product	May 2000 %	June 2000 %	July 2000 %	August 2000 %	September 2000 %	October 2000 %
LNP Benchmark 85%	LENS	NA	NA	NA	NA	NA	NA
	TAG	29	45	39	36	6	26
	EDI	33	33	37	37	35	38
UNE Benchmark 85%	LENS	62	54	61	58	55	61
	TAG	69	70	66	68	65	66
	EDI	40	49	41	59	18	39
Business resale Benchmark 90%	LENS	57	62	61	56	52	53
	TAG	37	35	43	47	45	47
	EDI	28	28	26	26	30	27
Residence resale Benchmark 95%	LENS	88	87	88	83	85	88
	TAG	94	93	94	89	94	95
	EDI	74	73	72	69	65	65

Flow-Through Measure
Results Comparison

CLEC Aggregate Data / **AT&T Data** – Percent of Total Mechanized LSRs

Product	LPN	UNE	Business	Residence
Measure / Month	CLEC/ **AT&T**	CLEC/ **AT&T**	CLEC/ **AT&T**	CLEC/ AT&T
% Designed Manual Fallout				
May	44 / **67**	20 / **62**	33 / **0**	5 / NA
June	43 / **74**	16 / **60**	32 / **30**	6 / NA
July	42 / **81**	20 / **49**	31 / **59**	5 / NA
August	34 / **84**	17 / **81**	26 / **83**	8 / NA
September	27 / **74**	23 / **76**	29 / **9**	6 / NA
October	28 / **74**	20 / **80**	31 / **15**	5 / NA
% BellSouth System Error				
May	24 / **0**	15 / **20**	18 / **33**	6 / NA
June	20 / **0**	16 / **20**	17 / **0**	6 / NA
July	21 / **0**	15 / **33**	16 / **0**	5 / NA
August	29 / **0**	17 / **8**	22 / **8**	8 / NA
September	39 / **0**	15 / **16**	21 / **36**	7 / NA
October	36 / **1**	15 / **7**	20 / **15**	6 /NA
Total % Fallout Caused By BellSouth				
May	68 / **67**	35 / **82**	51 / **33**	11 / NA
June	63 / **74**	32 / **80**	47 / **30**	12 / NA
July	63 / **81**	35 / **82**	47 / **59**	10 / NA
August	63 / **84**	34 / **89**	48 / **91**	16 / NA
September	66 / **74**	38 / **92**	50 / **45**	13 / NA
October	64 / **74**	35 / **87**	51 / **30**	11 / NA
Maximum Possible % Flow-Through				
May	32 / **33**	65 / **18**	49 / **67**	89 / NA
June	37 / **19**	68 / **20**	53 / **70**	88 / NA
July	37 / **19**	65 / **18**	53 / **41**	90 / NA
August	37 / **16**	66 / **11**	52 / **11**	84 / NA
September	34 / **26**	62 / **8**	50 / **55**	87 / NA
October	36 / **26**	65 / **13**	49 / **70**	89 / NA

Flow-Through Measure
Results Comparison
Basic Flow-Through

- Reflects the actual flow-through that occurs without regard to cause.
  - Goes up and down with CLEC input errors.
  - Goes up and down with requests BellSouth has "designed" to fallout.
  - Goes up and down with failures of BellSouth's system to perform.

Basic Percent Flow-through = (Issued SO's) ÷ (Total Mech LSR's) X 100

BellSouth Achieved Flow-Through

- Reflects flow-through that would occur if CLECs make no input errors.
  - CLEC input errors have no impact on the reported result.
  - Goes up and down with requests BellSouth has "designed" to fallout.
  - Goes up and down with failures of BellSouth's system to perform.
  - The difference between Basic and Achieved Flow-Through reflects the impact of CLEC input errors.
  - The measure itself reflects the operational flow-through performance delivered by BellSouth's interfaces as designed and operating.

BellSouth Achieved Percent Flow-through = (Issued SO's) ÷ ∑ Total Mech LSR's) - [(Auto Clarification) + (CLEC Caused Fallout)] X 100

System Potential Flow-Through

- Reflects flow-through that would occur if CLECs make no input errors and BellSouth eliminates designed fallout.
  - CLEC input errors have no impact on the reported result.
  - BellSouth designed fallout has no impact on the reported result.
  - Goes up and down only with failures of BellSouth's system to perform.
  - The difference between Achieved and System Potential Flow-Through reflects what the performance could be if there were no design deficiencies.
  - The difference between the result reported and 100% reflects the failure of the interfaces to perform as designed.

System Potential Percent Flow-through = (Issued SO's) + ∑ Total Mech LSR's) – [(Manual Fallout) + (Auto Clarification) + (CLEC Caused Fallout)] X 100

Flow-Through Measure
Results Comparison

Actual Flow-Through Results EDI Interface CLEC Aggregate / **AT&T**

Product	LPN		UNE		Business		Residence	
Measure/ Interface	**CLEC**	**AT&T**	**CLEC**	**AT&T**	**CLEC**	**AT&T**	**CLEC**	**AT&T**
Basic EDI								
May	22	**0**	14	**1.6**	16	**44**	59	**NA**
June	25	**0**	34	**3.1**	19	**50**	56	**NA**
July	28	**0**	26	**1.2**	14	**18**	57	**NA**
August	25	**0**	49	**3.2**	16	**0**	46	**NA**
September	26	**0**	2	**3.8**	20	**27**	42	**NA**
October	30	**2**	25	**4.6**	15	**23**	36	**NA**
Achieved EDI								
May	25	**0**	19	**2.0**	18	**57**	69	**NA**
June	27	**0**	40	**3.7**	21	**62**	67	**NA**
July	31	**0**	31	**1.4**	16	**23**	67	**NA**
August	28	**0**	55	**3.5**	18	**0**	60	**NA**
September	28	**0**	2.3	**4**	22	**38**	55	**NA**
October	33	**3**	29	**4.8**	17	**43**	39	**NA**
Potential EDI								
May	45	**0**	38	**8**	54	**57**	76	**NA**
June	51	**0**	58	**13**	64	**100**	74	**NA**
July	53	**0**	58	**3.4**	51	**100**	76	**NA**
August	45	**0**	89	**29**	53	**0**	65	**NA**
September	40	**0**	26	**19**	66	**43**	58	**NA**
October	46	**67**	87	**40**	69	**60**	56	**NA**

Flow-Through Measure
Results Comparison

Aggregated Interface and Product Results

Measure	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct
Basic	82	78	76	74	76	73	70	69	69	68
Achieved	89	86	84	83	84	82	82	77	78	79
Potential	95	93	92	92	91	90	91	87	88	89

Disaggregated Interface - Disaggregated Product Results
May 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (76)				
• EDI	22	14	16	59
• TAG	11	45	20	88
• LENS	-	37	37	79
Achieved (84)				
• EDI	25	19	18	69
• TAG	13	59	24	93
• LENS	-	49	47	86
Potential (91)				
• EDI	45	38	54	76
• TAG	52	78	65	96
• LENS	-	64	63	92
Volumes				
• EDI	5,263	1,901	1,360	3,076
• TAG	1,206	15,053	2,015	58,350
• LENS	-	2,219	6,524	139,160
• Total	6,469	19,173	9,899	200,586
LEO Total = 229,658	Good = 197,510	Bad = 32,148	% Bad = 14%	

Flow-Through Measure
Results Comparison

Disaggregated Interface - Disaggregated Product Results
June 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (73)				
• EDI	25	34	19	56
• TAG	26	53	16	86
• LENS	-	28	39	78
Achieved (82)				
• EDI	27	40	21	67
• TAG	32	64	20	95
• LENS	-	38	51	84
Potential (90)				
• EDI	51	58	64	74
• TAG	73	77	64	96
• LENS	-	55	65	92
Volumes				
• EDI	6,688	2,630	1,250	3,992
• TAG	2,509	45,123	2,427	61,459
• LENS	-	2,083	6,739	145,667
• Total	9,197	49,839	10,416	211,118
LEO Total = 271,373	Good = 207,126	Bad = 64,247	% Bad = 24%	

Flow-Through Measure
Results Comparison

Disaggregated Interface - Disaggregated Product Results
July 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (70)				
• EDI	28	26	14	57
• TAG	23	42	19	85
• LENS	-	34	41	79
Achieved (82)				
• EDI	31	31	16	67
• TAG	27	56	24	93
• LENS	-	46	51	87
Potential (91)				
• EDI	53	58	51	76
• TAG	72	75	71	96
• LENS	-	61	67	93
Volumes				
• EDI	6,025	1,988	1,079	4,520
• TAG	2,015	36,221	2,224	57,961
• LENS	-	5,241	6,702	136,989
• Total	8,040	43,450	10,005	199,470
LEO Total = 252,925	Good = 194,950	Bad = 57,975	% Bad = 23%	

Flow-Through Measure
Results Comparison

Disaggregated Interface - Disaggregated Product Results
August 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (69)				
• EDI	25	49	16	46
• TAG	23	49	26	80
• LENS	-	30	35	72
Achieved (77)				
• EDI	28	55	18	60
• TAG	26	60	33	88
• LENS	-	41	44	81
Potential (87)				
• EDI	45	89	53	65
• TAG	52	74	66	96
• LENS	-	57	59	90
Volumes				
• EDI	9,153	3,085	1,619	7,036
• TAG	1,646	36,853	1,182	57,865
• LENS	-	7,958	10,438	165,707
• Total	10,799	47,896	13,239	230,608
LEO Total = 291,743	Good = 226,657	Bad = 65,086	% Bad = 22%	

Flow-Through Measure
Results Comparison

Disaggregated Interface - Disaggregated Product Results
September 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (69)				
• EDI	26	2	20	42
• TAG	1	47	28	84
• LENS	-	40	35	75
Achieved (78)				
• EDI	28	2	22	55
• TAG	1	57	34	93
• LENS	-	47	42	83
Potential (88)				
• EDI	40	26	66	58
• TAG	2	77	68	96
• LENS	-	65	59	91
Volumes				
• EDI	13,285	1,423	1,221	7,142
• TAG	460	28,781	1,056	47,810
• LENS	-	7,879	9,168	151,901
• Total	13,745	38,083	11,445	206,853
LEO Total = 256,381	Good = 199,711	Bad = 56,670	% Bad = 22%	

Flow-Through Measure
Results Comparison

Disaggregated Interface - Disaggregated Product Results
October 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (68)				
• EDI	31	25	15	36
• TAG	20	48	22	81
• LENS	-	39	36	76
Achieved (79)				
• EDI	33	29	17	39
• TAG	21	59	29	94
• LENS	-	50	43	86
Potential (89)				
• EDI	46	87	69	56
• TAG	42	76	67	97
• LENS	-	67	61	93
Volumes				
• EDI	18,571	3,050	1,644	7,641
• TAG	2,229	58,758	1,180	65,976
• LENS	-	9,930	10,826	166,029
• Total	20,800	71,738	13,650	239,646
LEO Total = 325,034	Good = 235,055	Bad = 89,979	% Bad = 24%	

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REPORT NAME: CLEC LSR Information
REPORT PERIOD: 06/01/2000 to 06/30/2000
CLEC 7125 --

NOTES FOR REPORT ON CLEC LSR INFORMATION

This report contains information on all mechanically submitted, non-LNP LSRs that BellSouth processed for your company during the period noted above. For the purpose of this report, an LSR is a distinct cc/pon/ver combination. The data presented has several lines per LSR and where more than one line is needed to determine the status of an LSR (e.g., an LSR flows through when certain conditions are found/not found on three lines), it's still counted as one LSR. Each different version of a particular PON is considered a separate LSR within BellSouth. Below, you will find explanations for each column and its contents.

CC -- Your company code.

PON -- Your purchase order number as received on the LSR.

VER -- The LSR version.

TIMESTAMP -- Timestamp of note or error posting in LEO database.

TYPE -- Notes type. See explanations of each type in the next section.

ERR# -- ENCORE error number. Please refer to your LEO Implementation Guide for complete explanations of each error number.

NOTE OR ERROR DESCRIPTION -- Actual text of the note or error as found in the LEO database.

When comparing the results of this LSR information file with the flow through aggregate report, please note that this LSR information file contains LSR data for all submission types, (LENS, EDI, TAG), but are separated by cc while there's a separate line for each submission type on the aggregate report, the intent of this LSR information file is for the reconciliation for all LSRs submitted regardless of submission type.

NOTES TYPES EXPLAINED

There are several different types of notes, each with its own unique identifier. Many of these are internal to BellSouth, and will not be useful to you. Others will tell you immediately the type of note that you are viewing. For example, a type of 'C280' refers to an internal BellSouth program which generated the note text, and 'ERR' means that the note text contains an actual error message. Please note that each LSR may receive multiple errors and messages. All errors and messages must be taken into account in order to determine the treatment for that particular LSR.

TYPE	EXPLANATION
C###	Refers to the actual BellSouth program that generated the note text
CANC	Automatically cancelled by system due to inactivity
CLAR	Clarification message
CLM	LSR has been claimed
CRR	Mechanically generated order has been corrected
ERR	The notes field contains an error message, and the ERR# field is populated
FCCN	Manual FOC send
ISS	Manually issued order
LOAD	Successful change in the LEO database
MECH	Means that the LSR in question was received via a mechanized method
NAVI	Navigation message -- where the LSR was sent at that time
RETF	Return feed

SRET SOCS return message
SGNT LSR has been inserted to TSIGNOUT queue and is waiting to be claimed
WEB Message is posted to the web (LENS)

FLOWTHROUGH LOGIC

This section contains an explanation of the process by which BellSouth determines whether or not an LSR has flowed through the system. Please note the following: as each of the flowthrough steps is executed, LSRs that meet that step's criteria are removed from the base pool of LSRs, and are not included in any further calculations. For example, an LSR with both an auto clarification and a MANUALP fallout condition will be counted only once in the flow through calculation. In this example, the LSR will appear in the planned manual 'bucket' since the manual fallout step is executed before the auto clarification step.
In addition, an LSR with more than one error of the same type, e.g., auto clarification, will be counted only once in the flow through calculation. A list of all errors by error code and quantity can be found in the Flow Through Error Analysis report.

The steps for determining flowthrough are as follows (in order):

FATAL REJECTS

Finds all fatal reject records. A fatal reject is a record the system identifies as having severe CLEC errors that prohibit further processing and is returned to the CLEC. Fatal rejects are identified by looking for a note containing 'LSR REJECTED' and a note type of 'RETF' or 'C475', both of which indicate an LSR was rejected by the system. A fatally rejected LSR does not retain its initiating source system ID (i.e., LENS, EDI, TAG); therefore, it is impossible to determine the source of a fatal reject. Please note that fatal rejects are not a part of the flow through calculation and are NOT identified in this report.

AUTO CLARIFICATIONS

Finds all auto clarification records. An auto clarification record is a record the system identifies as having a CLEC error and returns the record to the CLEC with no further processing. All auto clarification LSRs contain the words 'AUTO CLARIFICATION' in the notes field.

PLANNED MANUALS

Finds all planned manual and manual clarification records. A planned manual LSR is an LSR that the system is not designed to handle mechanically due to its complexity. As a result, the LSR falls out for manual handling so that processing can be completed. A planned manual LSR will have the text 'MANUALP' as the first seven characters of the notes field.

FLOWTHROUGH LSRs

Finds all records that have had service orders issued in SOCS, i.e., all records that flowed through the system. An LSR is defined as having flowed through if the following logic is true:

* The note contains the text 'FOC STAGED FOR LSR' ***OR*** 'FOC AND CN STAGED FOR LSR'

AND

* The note contains the text 'ORDER NUM' ***OR*** 'INFO-ORDER' ***OR*** 'CANCELLED'

SYSTEM FALLOUT

Any LSRs that did not flow through the systems and were not planned manuals, fatal rejects, or auto clarifications are defined as system fallout.

CLEC CAUSED FALLOUT

CLEC caused fallout is defined as those LSRs with clarifications returned and/or clarifications posted.

CLARIFICATIONS RETURNED

Find all clarification returned LSRs. A clarification returned designation indicates than an LSR was received and was LESOG eligible, but could not flow through because additional information was required in order to process the LSR. The LSR requires a Bellsouth representative to review it; if the error is determined to be a CLEC error, the LSR is clarified back to the CLEC. This LSR contains the text 'CLARIFICATIONS RETURNED' in the notes field.

CLARIFICATIONS POSTED

Finds all clarifications posted LSRs. A clarification posted is identical to a clarification returned except that the clarification is posted to the web (LENS) rather than being sent to the CLEC via EDI or TAG. A clarification posted LSR contains the text 'CLARIFICATIONS POSTED' in the notes field.

BST CAUSED FALLOUT

All other LSRs that fall out of the system are counted, by default, as 'BST Caused Fallout'.

LSRS AND ASSOCIATED MESSAGES FOR THIS PERIOD

LIST OF LSRS WITH ACTIVITY DURING THE MONTH THAT WERE INCLUDED IN THIS MONTH'S FLOW THROUGH CALCULATION.

The following is a list of the LSRs originated this month and included in the flow through calculation, and all messages associated with each LSR received. Again, please remember that you must take into account all the messages and errors for each LSR to determine its treatment.

CC	PON	VER	TIMESTAMP	TYPE	ERR#	NOTE OR ERROR DESCRIPTION
7125	ZX4043499578	00	2000-06-01 09:45:20.1295	CB18		LSR LOADED AS MECHANIZED
7125	ZX4043499578	00	2000-06-01 09:45:20.8131	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX4043499578	00	2000-06-01 09:46:41.3445	ERR	7905	RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT
7125	ZX4043499578	00	2000-06-01 09:46:41.3991	C380		"AUTO CLARIFICATION" PLACED BY LESOG
7125	ZX4043499578	00	2000-06-01 09:46:41.6959	C475		CLARIFICATIONS RETURNED- G7905
7125	ZX4043499578	00	2000-06-01 09:46:41.6962	C475		855 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
7125	ZX4043499578	02	2000-06-01 11:30:08.9119	CB18		LSR LOADED AS MECHANIZED
7125	ZX4043499578	02	2000-06-01 11:30:09.3329	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX4043499578	02	2000-06-01 11:30:58.8882	C380		INFO-ORDER NUM: NO9NMRG7
7125	ZX4043499578	02	2000-06-01 11:30:58.9887	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX4043499578	02	2000-06-01 11:41:54.7585	C280		8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX4043499578	02	2000-06-01 11:41:55.2552	C475		865 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZX7704239008	00	2000-06-07 13:30:23.5817	CB18		LSR LOADED AS MECHANIZED
7125	ZX7704239008	00	2000-06-07 13:30:23.9364	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX7704239008	00	2000-06-07 13:33:46.2940	C380		INFO-OUT TO SOER
7125	ZX7704239008	00	2000-06-07 13:33:46.3575	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX7704239008	00	2000-06-07 13:33:46.3596	C380		INFO-ORDER NUM: NO6YC3R5
7125	ZX7704239008	00	2000-06-07 13:56:36.1798	C280		8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX7704239008	00	2000-06-07 13:56:36.6670	C475		855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZX7705907400	00	2000-06-01 12:00:07.5985	CB18		LSR LOADED AS MECHANIZED
7125	ZX7705907400	00	2000-06-01 12:00:08.1144	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX7705907400	00	2000-06-01 12:01:19.7597	C380		INFO-ORDER NUM: NOBW4WJ4
7125	ZX7705907400	00	2000-06-01 12:01:19.8539	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX7705907400	00	2000-06-01 12:26:15.8293	C280		8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX7705907400	00	2000-06-01 12:26:16.1204	C475		855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXALTY0001073A	00	2000-06-30 15:00:36.6672	CB18		LSR LOADED AS MECHANIZED
7125	ZXALTY0001073A	00	2000-06-30 15:00:37.7132	C865		LSR HAS BEEN SENT TO LESOG
7125	ZXALTY0001073A	00	2000-06-30 15:02:03.5644	ERR	7905	RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT
7125	ZXALTY0001073A	00	2000-06-30 15:02:03.6303	C380		"AUTO CLARIFICATION" PLACED BY LESOG
7125	ZXALTY0001073A	00	2000-06-30 15:02:04.0723	C475		CLARIFICATIONS RETURNED- G7905
7125	ZXALTY0001073A	00	2000-06-30 15:02:04.0736	C475		855 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED

```
7125 ZXATLY0000449B 03 2000-06-07 12:45:17.1212 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000449B 03 2000-06-07 12:45:17.5417 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000449B 03 2000-06-07 12:46:45.2506 C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000449B 03 2000-06-07 12:46:45.6081 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000449B 03 2000-06-07 12:46:45.6148 C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000449B 03 2000-06-08 16:00:21.4585 SGNT    DB02C240 UPDATED TSIGNOUT
7125 ZXATLY0000449B 03 2000-06-08 16:00:21.5487 ERR  1000 DUP LOOP SERVICE PG AND PRS CDC X1772.
7125 ZXATLY0000449B 03 2000-06-08 16:00:37.5337 CLAR    Clarify Requested for VER-9
7125 ZXATLY0000449B 03 2000-06-08 16:00:37.5409 SGNT    DB02C240 DELETED FROM TSIGNOUT
7125 ZXATLY0000449B 03 2000-06-08 16:00:38.1441 C475    CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0000449B 03 2000-06-08 16:00:38.1448 C475    865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0000449B 04 2000-06-13 14:30:17.7535 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000449B 04 2000-06-13 14:30:18.2018 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000449B 04 2000-06-13 14:30:51.1352 C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000449B 04 2000-06-13 14:30:51.1892 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000449B 04 2000-06-13 14:30:51.2020 C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000449B 04 2000-06-15 12:36:51.7925 CLM     LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000449B 04 2000-06-15 12:36:51.8370 CLM     LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000449B 04 2000-06-15 12:40:05.9476 ERR  1000 DUE TO RPON. CDC X1772
7125 ZXATLY0000449B 04 2000-06-15 12:40:17.4481 CLAR    Clarify Requested for VER-9
7125 ZXATLY0000449B 04 2000-06-15 12:40:17.6631 C475    CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0000449B 04 2000-06-15 12:40:17.6635 C475    865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0000449B 05 2000-06-16 09:15:28.9593 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000449B 05 2000-06-16 09:15:29.6995 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000449B 05 2000-06-16 09:16:24.1009 C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000449B 05 2000-06-16 09:16:24.1678 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000449B 05 2000-06-16 09:16:24.1732 C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000449B 05 2000-06-20 07:51:53.5533 CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000449B 05 2000-06-20 07:51:53.5764 CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000449B 05 2000-06-20 07:55:25.8176 ISS    ORDER CO1YCFQ7 DUE 6-27-00. GGOLAR X1753
7125 ZXATLY0000449B 05 2000-06-20 08:11:54.4058 C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000449B 05 2000-06-20 08:11:54.9116 C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000449B 05 2000-06-22 17:52:31.0542 C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000449B 06 2000-06-23 13:15:03.7464 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000449B 06 2000-06-23 13:15:04.1584 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000449B 06 2000-06-23 15:28:31.2963 C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000449B 06 2000-06-23 15:28:31.6232 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000449B 06 2000-06-23 15:28:31.7512 C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000449B 06 2000-06-27 10:38:13.8737 CLM     LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000449B 06 2000-06-27 10:38:13.9760 CLM     LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000449B 06 2000-06-27 10:38:59.0475 ISS    ORD CO1YCFQ7 DD 7-10-00 CDC X1772
7125 ZXATLY0000449B 06 2000-06-27 10:56:34.6589 C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000449B 06 2000-06-27 10:56:34.8858 C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000449B 06 2000-06-27 10:56:37.0328 C475    POS ISSUED, SOCS STATUS - PD      PENDING ORDER
7125 ZXATLY0000467A 03 2000-06-03 08:56:30.9809 C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000467A 04 2000-06-07 09:15:05.9534 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000467A 04 2000-06-07 09:15:06.6789 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000467A 04 2000-06-07 09:15:38.5574 C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000467A 04 2000-06-07 09:15:38.7386 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000467A 04 2000-06-07 09:15:38.7419 C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000467A 04 2000-06-07 13:56:22.5966 CLM     LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0000467A 04 2000-06-07 13:56:22.6357 CLM     LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0000467A 04 2000-06-07 13:56:53.2471 C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000467A 04 2000-06-07 13:56:53.4283 C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000467A 04 2000-06-07 14:12:23.7352 C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000467A 04 2000-06-09 05:27:14.0066 C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000597C 02 2000-06-01 08:26:10.0632 CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000597C 02 2000-06-01 08:26:10.1472 CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000597C 02 2000-06-01 08:26:47.4091 C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
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7125 ZXATLY0001063  05 2000-06-14 11:52:39.2635 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001063  05 2000-06-14 11:52:39.2662 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001063  05 2000-06-16 16:43:01.6850 CLM    LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0001063  05 2000-06-16 16:43:01.7073 CLM    LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0001063  05 2000-06-19 08:51:51.3938 ISS    ISSUED ORDER CO22R065 6 LOOPS CIRCUITS IN ORDER 38 LYFU.646774..SB THROUGH 646779  ROBIN X 1745
7125 ZXATLY0001063  05 2000-06-19 08:55:40.7215 NOTE   DUE DATE IS 06-26-00 RW X 1745
7125 ZXATLY0001063  05 2000-06-19 08:56:35.0606 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001063  05 2000-06-19 08:56:35.4047 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001063  05 2000-06-19 08:56:40.0220 C475   POS ISSUED, SOCS STATUS - PD      PENDING ORDER
7125 ZXATLY0001063  05 2000-06-19 09:12:52.8656 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001063  05 2000-06-19 09:13:13.1182 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001063  05 2000-06-26 14:56:23.0291 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001063  05 2000-06-26 14:56:27.4855 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001063  05 2000-06-26 20:56:17.3215 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001063  05 2000-06-27 17:57:31.9135 C280   865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125 ZXATLY0001063  05 2000-06-27 17:57:32.2066 C475   865 ISSUED RETURN-FEED # 0003 COMPLETION SENT
7125 ZXATLY0001161  00 2000-06-02 06:27:32.0674 CLM    LSR CLAIMED BY CUID - PKCQXFG
7125 ZXATLY0001161  00 2000-06-02 06:27:32.1797 CLM    LSR CLAIMED BY CUID - PKCQXFG
7125 ZXATLY0001161  00 2000-06-02 07:34:22.7523 ISS    CO6870C2 DD 06-13-00 CYNTHIA X1715
7125 ZXATLY0001161  00 2000-06-02 07:56:23.6832 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001161  00 2000-06-02 07:56:24.0384 C475   855 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001161  00 2000-06-02 07:56:24.2608 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001161  00 2000-06-05 10:27:16.4582 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001161  00 2000-06-05 11:56:53.3621 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001161  00 2000-06-13 16:17:09.1051 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001161  00 2000-06-13 19:56:46.2419 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001161  00 2000-06-14 07:56:23.9544 C280   865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125 ZXATLY0001161  00 2000-06-14 07:56:24.4842 C475   865 ISSUED RETURN-FEED # 0002 COMPLETION SENT
7125 ZXATLY0001176  00 2000-06-01 09:45:19.4021 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001176  00 2000-06-01 09:45:20.1226 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001176  00 2000-06-01 09:45:53.6327 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001176  00 2000-06-01 09:45:53.6973 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001176  00 2000-06-01 09:45:53.7003 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001176  00 2000-06-03 11:57:56.7740 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0001176  00 2000-06-03 11:57:56.8641 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0001176  00 2000-06-03 11:58:41.5439 ISS    ORDER CO8PJGB1 DUE 06-13-00. GGOLAR X2007
7125 ZXATLY0001176  00 2000-06-03 13:11:27.2593 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001176  00 2000-06-03 13:11:28.0373 C475   855 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001176  00 2000-06-03 13:11:28.2559 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001176  00 2000-06-13 12:36:53.0538 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001176  00 2000-06-13 12:37:45.1928 C280   865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125 ZXATLY0001176  00 2000-06-13 12:37:45.4777 C475   865 ISSUED RETURN-FEED # 0002 COMPLETION SENT
7125 ZXATLY0001190  00 2000-06-01 10:45:06.4239 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001190  00 2000-06-01 10:45:06.9094 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001190  00 2000-06-01 10:45:52.6695 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001190  00 2000-06-01 10:45:52.7347 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001190  00 2000-06-01 10:45:52.7378 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001190  00 2000-06-05 08:20:06.1901 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0001190  00 2000-06-05 08:20:06.2975 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0001190  00 2000-06-05 08:20:45.0147 ISS    ORDER CO06NFJ7 DUE 6-14-00. GGOLAR X2007
7125 ZXATLY0001190  00 2000-06-05 08:41:39.8845 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001190  00 2000-06-05 08:41:40.1992 C475   855 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001190  00 2000-06-05 08:41:42.1827 C475   POS ISSUED, SOCS STATUS - PD      PENDING ORDER
7125 ZXATLY0001190  00 2000-06-05 08:41:55.0232 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001190  00 2000-06-05 08:41:56.6434 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001190  00 2000-06-05 09:12:36.3617 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001190  00 2000-06-05 09:12:45.8058 C280   PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001190  02 2000-06-12 15:45:03.6816 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001190  02 2000-06-12 15:45:04.0696 C865   LSR HAS BEEN SENT TO LESOG
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7125 ZXATLY0000655E  05 2000-06-14 16:25:25.5675  C475    865 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
7125 ZXATLY0000655E  06 2000-06-15 08:30:39.1761  CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000655E  06 2000-06-15 08:30:39.6957  C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000655E  06 2000-06-15 08:30:48.2168  C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000655E  06 2000-06-15 08:30:48.2497  SGNT     DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000655E  06 2000-06-15 08:30:48.2500  C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000655E  06 2000-06-19 05:17:08.8586  CLM     LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0000655E  06 2000-06-19 05:17:08.9295  CLM     LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0000655E  06 2000-06-19 05:30:05.1699  ISS    ORD COCDH639 06-26-00, SR D AARON X1760
7125 ZXATLY0000655E  06 2000-06-19 05:56:14.2181  C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000655E  06 2000-06-19 05:56:14.5758  C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000655E  06 2000-06-19 05:58:20.5230  C280    PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0000655E  06 2000-06-24 13:26:39.4413  C280    PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0000655E  06 2000-06-24 13:26:40.5180  C475    POS ISSUED, SOCS STATUS - PD      PENDING ORDER
7125 ZXATLY0000655E  07 2000-06-26 10:15:20.7440  CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000655E  07 2000-06-26 10:15:21.2961  C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000655E  07 2000-06-26 10:16:12.5066  ERR  7465  CANNOT CANCEL ORDER
7125 ZXATLY0000655E  07 2000-06-26 10:16:12.5481  C380    REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXATLY0000655E  07 2000-06-26 10:16:12.7018  SGNT     DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000655E  07 2000-06-26 10:16:12.7021  C380    ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXATLY0000655E  07 2000-06-26 10:16:13.5132  C475    865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXATLY0000655E  07 2000-06-26 10:34:17.8669  CLM     LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0000655E  07 2000-06-26 10:34:17.8726  CLM     LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0000655E  07 2000-06-26 10:34:54.4108  :      CANCELLED ORDER COCDH639 PER SUP1 REQUEST ON VERSION 07 RECVD 06-26-00 RW X 1745
7125 ZXATLY0000655E  07 2000-06-26 10:56:25.8900  C280    CANCELLED ORDER COCDH639 RECEIVED FROM SOCS
7125 ZXATLY0000655E  07 2000-06-26 10:56:26.0103  C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000655E  07 2000-06-26 10:56:26.2230  C475    865 ISSUED RETURN-FEED # 0002 FOC SENT
7125 ZXATLY0000825A  10 2000-06-12 15:56:26.9125  C280    8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000825A  10 2000-06-12 15:56:27.1786  C475    865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000825A  11 2000-06-13 08:45:18.5506  CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000825A  11 2000-06-13 08:45:18.8861  C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000825A  11 2000-06-13 09:36:08.6762  C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000825A  11 2000-06-13 09:36:08.7790  SGNT     DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000825A  11 2000-06-13 09:36:08.8404  C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000825A  11 2000-06-14 08:40:22.3286  CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000825A  11 2000-06-14 08:40:22.3302  CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000825A  11 2000-06-14 08:56:37.5524  C280    CANCELLED ORDER CO83RHG9 RECEIVED FROM SOCS
7125 ZXATLY0000825A  11 2000-06-14 08:56:37.6925  C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000825A  11 2000-06-14 08:56:38.0401  C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000918   08 2000-06-02 08:00:23.9138  CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000918   06 2000-06-02 08:00:24.5655  C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000918   06 2000-06-02 08:01:06.3887  ERR  7465  CANNOT CANCEL ORDER
7125 ZXATLY0000918   06 2000-06-02 08:01:06.4397  C380    REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXATLY0000918   06 2000-06-02 08:01:06.4506  SGNT     DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000918   06 2000-06-02 08:01:06.4509  C380    ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXATLY0000918   06 2000-06-02 08:01:06.6031  C475    865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXATLY0000918   06 2000-06-02 08:11:25.8283  SGNT     DB02C280 DELETED FROM TSIGNOUT
7125 ZXATLY0000918   08 2000-06-02 08:11:25.9343  C280    8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000918   08 2000-06-02 08:11:26.1812  C475    865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000918   06 2000-06-03 13:56:20.1813  C280    8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000918   06 2000-06-03 13:56:20.5965  C475    865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000918   06 2000-06-06 10:00:49.6294  C280    8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000918   06 2000-06-06 10:00:49.9838  C475    865 ISSUED RETURN-FEED # 0004 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000918   06 2000-06-08 10:05:01.3586  C280    8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000918   06 2000-06-08 10:05:01.4320  C475    865 ISSUED RETURN-FEED # 0005 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000918   06 2000-06-20 07:26:24.5056  C280    PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0000921   03 2000-06-15 01:01:54.3033  CANC     Cancelled By System
7125 ZXATLY0000924B  03 2000-06-03 10:16:58.3178  CLM     Lsr Claimed By CUID - YHBWLMP
7125 ZXATLY0000924B  03 2000-06-03 10:26:22.9016  C280    CANCELLED ORDER CO8P1H90 RECEIVED FROM SOCS
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7125 ZXATLY0000924B  03 2000-06-03 10:26:22.9618 C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000924B  03 2000-06-03 10:26:23.1581 C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000977   05 2000-06-01 16:02:08.8080 CLM     LSR CLAIMED BY CUID - BLWNCLZ
7125 ZXATLY0000977   05 2000-06-01 16:02:08.8629 CLM     LSR CLAIMED BY CUID - BLWNCLZ
7125 ZXATLY0000977   05 2000-06-01 16:06:27.4256 ISS    DDD CHG TO 6-15-00 THE ORDER NUMBER IS CO86VBG1. JA EXT 1964
7125 ZXATLY0000977   05 2000-06-01 16:26:50.4501 C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000977   05 2000-06-01 16:26:50.7732 C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000977   05 2000-06-01 16:27:08.7255 C280    PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0000977   05 2000-06-15 14:41:59.3563 C280    8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000977   05 2000-06-15 14:41:59.6249 C475    865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000977   05 2000-06-16 15:41:47.5562 C280    8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000977   05 2000-06-16 15:41:47.7225 C475    865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0001045   04 2000-06-02 10:30:04.0897 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0001045   04 2000-06-02 10:30:05.0005 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001045   04 2000-06-02 10:30:38.8090 ERR  7465  CANNOT CANCEL ORDER
7125 ZXATLY0001045   04 2000-06-02 10:30:38.8562 C380    REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXATLY0001045   04 2000-06-02 10:30:38.8599 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001045   04 2000-06-02 10:30:38.8818 C380    ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXATLY0001045   04 2000-06-02 10:30:39.3149 C475    865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXATLY0001045   04 2000-06-05 13:27:31.4416 SGNT    DB02C280 DELETED FROM TSIGNOUT
7125 ZXATLY0001045   04 2000-06-05 13:27:31.5224 C280    8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0001045   04 2000-06-05 13:27:31.7740 C475    865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0001045   04 2000-06-22 13:29:51.7179        ORDER CANCELLED PER SUP 1 REQUEST ORDER CO7W1NK7 WAS IN MA STATUS RW X 1745
7125 ZXATLY0001045   04 2000-06-22 14:50:24.6958 C240    LSR PROC STATUS BACK TO F CUID - PKYQHYK
7125 ZXATLY0001045   04 2000-06-22 15:52:40.2884 C280    PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001063   03 2000-06-07 15:00:10.2031 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0001063   03 2000-06-07 15:00:10.8670 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001063   03 2000-06-07 15:01:26.4210 C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001063   03 2000-06-07 15:01:26.4846 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001063   03 2000-06-07 15:01:26.4667 C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001063   03 2000-06-09 15:55:35.6591 CLM     LSR CLAIMED BY CUID - YH8WLMP
7125 ZXATLY0001063   03 2000-06-09 15:55:35.6893 CLM     LSR CLAIMED BY CUID - YH8WLMP
7125 ZXATLY0001063   03 2000-06-09 15:56:39.7091 ISS    ORD CO4KXM18 DD 06-23-00, SR D AARON X1760
7125 ZXATLY0001063   03 2000-06-09 16:12:51.3111 C280    8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001063   03 2000-06-09 16:12:51.5518 C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001063   03 2000-06-09 16:12:56.4995 C280    PREVIOUS FOC HAS BEEN SENT,   NO ACTION TAKEN.
7125 ZXATLY0001063   04 2000-06-12 14:30:04.5134 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0001063   04 2000-06-12 14:30:05.1487 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001063   04 2000-06-12 14:30:19.8766 C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001063   04 2000-06-12 14:30:19.9413 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001063   04 2000-06-12 14:30:19.9741 C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001063   04 2000-06-14 09:18:15.8928 CLM     LSR CLAIMED BY CUID - YH8WLMP
7125 ZXATLY0001063   04 2000-06-14 09:18:16.0591 CLM     LSR CLAIMED BY CUID - YH8WLMP
7125 ZXATLY0001063   04 2000-06-14 09:25:46.8584 ERR  1000  INVALID TOS, SR D AARON X1760
7125 ZXATLY0001063   04 2000-06-14 09:25:50.5656 CLAR    Clarify Requested for VER-9
7125 ZXATLY0001063   04 2000-06-14 09:25:50.9235 C475    CLARIFICATIONS RETURNED-  1000
7125 ZXATLY0001063   04 2000-06-14 09:25:50.9239 C475    865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0001063   04 2000-06-14 09:41:38.0068 C280    CO4KXM18:#ATTEMPTS=00 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZXATLY0001063   04 2000-06-14 09:41:44.3864 C280    CO4KXM18:#ATTEMPTS=00 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZXATLY0001063   04 2000-06-14 09:41:57.2954 C280    CANCEL SVC ORD BYPASSED, SUPP NOT = "D1"
7125 ZXATLY0001063   04 2000-06-14 10:11:16.9409 C280    CO4KXM18:#ATTEMPTS=01 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZXATLY0001063   04 2000-06-14 10:11:17.6379 C280    CO4KXM18:#ATTEMPTS=01 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZXATLY0001063   04 2000-06-14 10:41:16.6032 C280    CO4KXM18:FOC BUILD AND HOLD REQUESTED
7125 ZXATLY0001063   04 2000-06-14 10:41:17.0700 C475    865 ISSUED RETURN-FEED # 0002 FOC BUILT NOT SENT
7125 ZXATLY0001063   04 2000-06-14 10:41:17.2472 C280    CO4KXM18:FOC BUILD AND HOLD REQUESTED
7125 ZXATLY0001063   04 2000-06-14 10:41:17.3028 C475    865 ISSUED RETURN-FEED # 0003 FOC BUILT NOT SENT
7125 ZXATLY0001063   05 2000-06-14 11:51:32.8736 CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0001063   05 2000-06-14 11:51:33.2461 C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001063   05 2000-06-14 11:52:39.1631 C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
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7125	ZXATLY0001063	05	2000-06-14 11:52:39.2635	SGNT	D802C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001063	05	2000-06-14 11:52:39.2662	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001063	05	2000-06-16 16:43:01.6850	CLM	LSR CLAIMED BY CUID - PKYQHYK
7125	ZXATLY0001063	05	2000-06-16 16:43:01.7073	CLM	LSR CLAIMED BY CUID - PKYQHYK
7125	ZXATLY0001063	05	2000-06-19 08:51:51.3938	ISS	ISSUED ORDER CO22R065 6 LOOPS CIRCUITS IN ORDER 38 LYFU 646774..SB THROUGH 646779 ROBIN X 1745
7125	ZXATLY0001063	05	2000-06-19 08:55:40.7215	NOTE	DUE DATE IS 06-26-00 RW X 1745
7125	ZXATLY0001063	05	2000-06-19 08:56:35.0606	C280	8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001063	05	2000-06-19 08:56:35.4047	C475	865 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001063	05	2000-06-19 08:56:40.0220	C475	POS ISSUED, SOCS STATUS - PD PENDING ORDER
7125	ZXATLY0001063	05	2000-06-19 09:12:52.8656	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-19 09:13:13.1182	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-26 14:56:23.0291	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-26 14:56:27.4855	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-26 20:58:17.3215	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-27 17:57:31.9135	C280	865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125	ZXATLY0001063	05	2000-06-27 17:57:32.2066	C475	865 ISSUED RETURN-FEED # 0003 COMPLETION SENT
7125	ZXATLY0001161	00	2000-06-02 06:27:32.0874	CLM	LSR CLAIMED BY CUID - PKCQXFG
7125	ZXATLY0001161	00	2000-06-02 06:27:32.1797	CLM	LSR CLAIMED BY CUID - PKCQXFG
7125	ZXATLY0001161	00	2000-06-02 07:34:22.7523	ISS	CO6870C2 DD 06-13-00 CYNTHIA X1715
7125	ZXATLY0001161	00	2000-06-02 07:56:23.6832	C280	8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001161	00	2000-06-02 07:56:24.0384	C475	855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001161	00	2000-06-02 07:56:24.2606	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-05 10:27:16.4582	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-05 11:56:53.3621	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-13 16:17:09.1051	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-13 19:56:46.2419	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-14 07:56:23.9544	C280	865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125	ZXATLY0001161	00	2000-06-14 07:56:24.4842	C475	865 ISSUED RETURN-FEED # 0002 COMPLETION SENT
7125	ZXATLY0001176	00	2000-06-01 09:45:19.4021	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001176	00	2000-06-01 09:45:20.1226	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001176	00	2000-06-01 09:45:53.6327	C380	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001176	00	2000-06-01 09:45:53.6973	SGNT	DB02C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001176	00	2000-06-01 09:45:53.7003	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001176	00	2000-06-03 11:57:56.7740	CLM	LSR CLAIMED BY CUID - LZBKNZG
7125	ZXATLY0001176	00	2000-06-03 11:57:56.8641	CLM	LSR CLAIMED BY CUID - LZBKNZG
7125	ZXATLY0001176	00	2000-06-03 11:58:41.5439	ISS	ORDER CO8PJGB1 DUE 06-13-00. GGOLAR X2007
7125	ZXATLY0001176	00	2000-06-03 13:11:27.2593	C280	8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001176	00	2000-06-03 13:11:28.0373	C475	855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001176	00	2000-06-03 13:11:28.2559	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001176	00	2000-06-13 12:36:53.0538	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001176	00	2000-06-13 12:37:45.1928	C280	865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125	ZXATLY0001176	00	2000-06-13 12:37:45.4777	C475	865 ISSUED RETURN-FEED # 0002 COMPLETION SENT
7125	ZXATLY0001190	00	2000-06-01 10:45:06.4239	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001190	00	2000-06-01 10:45:06.9094	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001190	00	2000-06-01 10:45:52.6695	C380	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001190	00	2000-06-01 10:45:52.7347	SGNT	DB02C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001190	00	2000-06-01 10:45:52.7378	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001190	00	2000-06-05 08:20:06.1901	CLM	LSR CLAIMED BY CUID - LZBKNZG
7125	ZXATLY0001190	00	2000-06-05 08:20:06.2975	CLM	LSR CLAIMED BY CUID - LZBKNZG
7125	ZXATLY0001190	00	2000-06-05 08:20:45.0147	ISS	ORDER CO06NFJ7 DUE 6-14-00. GGOLAR X2007
7125	ZXATLY0001190	00	2000-06-05 08:41:39.8845	C280	8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001190	00	2000-06-05 08:41:40.1992	C475	855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001190	00	2000-06-05 08:41:42.1827	C475	POS ISSUED, SOCS STATUS - PD PENDING ORDER
7125	ZXATLY0001190	00	2000-06-05 08:41:55.0232	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001190	00	2000-06-05 08:41:56.6434	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001190	00	2000-06-05 09:12:36.3617	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001190	00	2000-06-05 09:12:45.8058	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001190	02	2000-06-12 15:45:03.6816	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001190	02	2000-06-12 15:45:04.0696	C865	LSR HAS BEEN SENT TO LESOG

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7125 ZXATLY0001190  02 2000-06-12 15:45:40.7662 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001190  02 2000-06-12 15:45:40.8371 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001190  02 2000-06-12 15:45:40.8398 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001190  02 2000-06-14 08:23:50.4337 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0001190  02 2000-06-14 08:23:50.4926 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0001190  02 2000-06-14 08:41:39.6651 C280   CANCELLED ORDER CO6NFJ7 RECEIVED FROM SOCS
7125 ZXATLY0001190  02 2000-06-14 08:41:39.7795 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001190  02 2000-06-14 08:41:40.2698 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001261  00 2000-06-12 16:01:16.2418 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  00 2000-06-12 16:01:20.6594 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  00 2000-06-13 05:15:04.8221 C510   LSR RESENT - NO RESPONSE FROM BSOG/LESOG
7125 ZXATLY0001261  00 2000-06-13 05:15:12.5294 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  00 2000-06-13 05:17:30.9236 ERR  7935 RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP
7125 ZXATLY0001261  00 2000-06-13 05:17:31.1284 C380   "AUTO CLARIFICATION" PLACED BY LESOG
7125 ZXATLY0001261  00 2000-06-13 05:17:31.6501 C475   CLARIFICATIONS RETURNED- G7935
7125 ZXATLY0001261  00 2000-06-13 05:17:31.6983 C475   855 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0001261  02 2000-06-13 08:15:04.9322 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  02 2000-06-13 08:15:05.5649 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  02 2000-06-13 08:16:37.0194 ERR  7935 RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP
7125 ZXATLY0001261  02 2000-06-13 08:16:37.3298 C380   "AUTO CLARIFICATION" PLACED BY LESOG
7125 ZXATLY0001261  02 2000-06-13 08:16:38.4635 C475   CLARIFICATIONS RETURNED- G7935
7125 ZXATLY0001261  02 2000-06-13 08:16:38.4639 C475   865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED

7125 ZXATLY0001261  03 2000-06-13 10:30:23.6871 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  03 2000-06-13 10:30:24.0961 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  03 2000-06-13 10:31:36.0465 ERR  7755 UNE - NPANXX NOT FOUND IN CLLI TABLE
7125 ZXATLY0001261  03 2000-06-13 10:31:36.1682 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001261  03 2000-06-13 10:31:36.1949 C380   LSR IN "ERROR" STATUS PLACED BY LESOG
7125 ZXATLY0001261  03 2000-06-15 08:43:45.6142 SGNT    DB02C240 UPDATED TSIGNOUT
7125 ZXATLY0001261  03 2000-06-15 08:43:45.6148 ERR  1000 BI1 FIELD INVALID, SR D AARONN X1760
7125 ZXATLY0001261  03 2000-06-15 08:43:48.2089 CLAR    Clarify Requested for VER-9
7125 ZXATLY0001261  03 2000-06-15 08:43:48.2618 SGNT    DB02C240 DELETED FROM TSIGNOUT
7125 ZXATLY0001261  03 2000-06-15 08:43:48.6528 C475   CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0001261  03 2000-06-15 08:43:48.6532 C475   865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0001261  04 2000-06-15 11:00:41.8791 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  04 2000-06-15 11:00:42.1477 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  04 2000-06-15 11:03:20.9914 ERR  7755 UNE - NPANXX NOT FOUND IN CLLI TABLE
7125 ZXATLY0001261  04 2000-06-15 11:03:21.2226 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001261  04 2000-06-15 11:03:21.2255 C380   LSR IN "ERROR" STATUS PLACED BY LESOG
7125 ZXATLY0001261  04 2000-06-19 10:27:45.5567 NOTE    LSR CLAIMED BY PKYQHYK
7125 ZXATLY0001261  04 2000-06-19 10:28:58.8264 ISS    ISS CO16VTW6 DUE 06-26-00 CKKT 38.LYFU.646830..SB. PTPM1 X 613 FOR KIMBERLY MESSNE- ROBIN X 1745
7125 ZXATLY0001261  04 2000-06-21 13:00:42.4862 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001261  04 2000-06-21 13:00:42.8109 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001261  04 2000-06-21 13:02:09.7171 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0001261  04 2000-06-26 15:11:41.1720 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0001261  04 2000-06-26 15:11:41.5444 C475   865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0001261  05 2000-06-26 16:15:06.7539 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  05 2000-06-26 16:15:08.4151 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  05 2000-06-26 16:15:39.8182 ERR  7465 CANNOT CANCEL ORDER
7125 ZXATLY0001261  05 2000-06-26 16:15:39.8596 C380   REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXATLY0001261  05 2000-06-26 16:15:39.9573 SGNT    DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001261  05 2000-06-26 16:15:39.9575 C380   ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXATLY0001261  05 2000-06-26 16:15:40.2797 C475   865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXATLY0001261  05 2000-06-27 16:56:31.8372 CLM    LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0001261  05 2000-06-27 16:56:31.8387 CLM    LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0001261  05 2000-06-27 16:57:30.1349        CANCELLED ORDER CO16VTW6 IN MA STATUS RW X 1745
7125 ZXATLY0001261  05 2000-06-27 16:58:45.9297 NOTE    CANCELLED ORDER PER SUP1 REQUEST RW X 1745
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7125 ZXATLY0001261  05 2000-06-27 17:13:22.2101 C280   CANCELLED ORDER CO16VTW6 RECEIVED FROM SOCS
7125 ZXATLY0001261  05 2000-06-27 17:13:22.2748 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001261  05 2000-06-27 17:13:22.5935 C475   865 ISSUED RETURN-FEED # 0002 FOC SENT
7125 ZXATLY0001267  00 2000-06-20 10:45:05.5692 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001267  00 2000-06-20 10:45:06.5758 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001267  00 2000-06-20 20:05:45.4091 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001267  00 2000-06-20 20:05:45.7510 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001267  00 2000-06-20 20:05:45.7941 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001267  00 2000-06-22 05:57:15.1538 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001267  00 2000-06-22 05:57:15.1907 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001267  00 2000-06-22 05:57:43.5427 ERR  1000 RPON MISSING, SR D AARON X1760
7125 ZXATLY0001267  00 2000-06-22 05:57:45.9837 CLAR   Clarify Requested for VER-9
7125 ZXATLY0001267  00 2000-06-22 05:57:46.3227 C475   CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0001267  00 2000-06-22 05:57:46.3231 C475   855 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0001267  02 2000-06-22 16:30:34.0065 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001267  02 2000-06-22 16:30:35.8278 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001267  02 2000-06-22 21:01:44.7751 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001267  02 2000-06-22 21:01:45.0029 SGNT   DB02C380 INSERTED TO TSIGNOUT
7126 ZXATLY0001267  02 2000-06-22 21:01:45.0911 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001267  02 2000-06-23 16:56:08.3173 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001267  02 2000-06-23 16:56:08.3212 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001267  02 2000-06-23 16:58:50.2553 ERR  1000 RPON MISSING ARE TYPED INCORRECTLY, SR D AARON X1760
7125 ZXATLY0001267  02 2000-06-23 16:58:55.3391 CLAR   Clarify Requested for VER-9
7125 ZXATLY0001267  02 2000-06-23 16:58:55.7459 C475   CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0001267  02 2000-06-23 16:58:55.7463 C475   865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0001267  03 2000-06-26 12:00:24.1641 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001267  03 2000-06-26 12:00:24.4688 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001267  03 2000-06-26 12:01:11.2478 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001267  03 2000-06-26 12:01:11.2696 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001267  03 2000-06-26 12:01:11.2713 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001267  03 2000-06-28 11:40:17.7764 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001267  03 2000-06-28 11:40:17.9205 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001267  03 2000-06-28 11:47:54.1991 ISS    ORD CO16DWX6 DD 07-07-00, SR D AARON X1760
7125 ZXATLY0001267  03 2000-06-28 12:11:23.4348 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001267  03 2000-06-28 12:11:23.7679 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001267  03 2000-06-29 16:42:12.7591 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0001267  03 2000-06-29 16:42:29.2571 C475   POS ISSUED, SOCS STATUS - PD      PENDING ORDER
7125 ZXATLY0001362  00 2000-06-22 09:45:22.3948 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001362  00 2000-06-22 09:45:23.6378 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001362  00 2000-06-22 09:47:02.0335 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001362  00 2000-06-22 09:47:02.2046 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001362  00 2000-06-22 09:47:02.2123 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001362  00 2000-06-23 06:34:30.2329 CLM    LSR CLAIMED BY CUID - BLWNCLZ
7125 ZXATLY0001362  00 2000-06-23 06:34:30.2976 CLM    LSR CLAIMED BY CUID - BLWNCLZ
7125 ZXATLY0001362  00 2000-06-23 06:43:46.9468 ERR  1000 THE LSO AND BI1 IS INCORRECT. JAMES EXT 1764
7125 ZXATLY0001362  00 2000-06-23 06:43:55.3356 CLAR   Clarify Requested for VER-9
7125 ZXATLY0001362  00 2000-06-23 06:43:55.8079 C475   CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0001362  00 2000-06-23 06:43:55.8082 C475   855 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
7125 ZXATLY0001362  02 2000-06-23 16:15:04.6310 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001362  02 2000-06-23 16:15:04.9998 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001362  02 2000-06-23 17:22:31.0640 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001362  02 2000-06-23 17:22:31.1723 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001362  02 2000-06-23 17:22:31.2554 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001362  02 2000-06-26 16:22:39.3306 CLM    LSR CLAIMED BY CUID - NRZKLNQ
7125 ZXATLY0001362  02 2000-06-26 16:22:39.3358 CLM    LSR CLAIMED BY CUID - NRZKLNQ
7125 ZXATLY0001362  02 2000-06-26 16:29:18.7671 ERR  1000 PLS PROVIDE AN N-ACCT NUMBER IN THE BI1 FIELD; NYCOLLE X1733
7125 ZXATLY0001362  02 2000-06-26 16:29:21.9426 CLAR   Clarify Requested for VER-9
7125 ZXATLY0001362  02 2000-06-26 16:29:22.0222 C475   CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0001362  02 2000-06-26 16:29:22.0225 C475   865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
```

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Friday, October 20, 2000 12:43 PM
To: gpterry@att.com; bradbury@att.com; sharonnorris@att.com; eppsteiner@att.com; campbekj@att.com; belangda@att.com; smorrow@broadband.att.com; dobeck@broadband.att.com; crcannon@att.com; watersre@att.com; bcsturdevant@att.com; deberger@att.com; waldbads@att.com
Subject: FW: Order Backlog

Importance: High

> -----Original Message-----
> From: Williamson, Jill R, NCAM
> Sent: Friday, October 20, 2000 12:30 PM
> To: 'Jan M. Burriss'
> Cc: 'Sandra C. Jones'
> Subject: Order Backlog
> Importance: High
>
> Jan,
>
> I've received calls from several of our workcenters this week around an
> apparent backlog of orders at the LCSC. I spoke with Sandra earlier this
> week and found that the LCSC is backlogged due to the addition of the
> Broadband orders in the Atlanta LCSC.
>
> We have orders that were sent a week ago that have yet to receive a
> response. When we call the LCSC to get the orders turned around, they
> will only accept two PONs per call. Thus our workcenter must spend a
> great deal of time calling the LCSC just to get a response on the orders.
>
> I called Ron Moore today to request that he accept a list of the PONS to
> be worked instead of us calling back two PONS at a time (Broadband has 36
> orders backlogged). I'm waiting on Ron's response. Additionally, I don't
> understand why BellSouth is having this problem when it knew the volume of
> orders it would be transitioning from Birmingham to Atlanta. I'd
> appreciate your providing me with a plan to remedy the current backlog and
> BellSouth's plan to correct the issue going forward. I'd appreciate a
> response by close of business today.
>
> Sincerely,
>
> Jill Williamson
>

TRA Docket No. 00-00079
JMB-34
Page 1 of 2

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Monday, November 06, 2000 12:58 PM
To: mlacy@att.com; bseigler@att.com; gpterry@att.com; eppsteiner@att.com; sharonnorris@att.com; bradbury@att.com; bobik@att.com; dreinig@att.com; deberger@att.com; watersre@att.com; dobeck@broadband.att.com; smorrow@broadband.att.com; waldbads@att.com; campbekj@att.com; crcannon@att.com
Subject: FW: LCSC backlog

-----Original Message-----
From: Jan.Flint@bridge.bellsouth.com
[mailto:Jan.Flint@bridge.bellsouth.com]
Sent: Friday, November 03, 2000 3:27 PM
To: Williamson, Jill R, NCAM
Cc: Jan.Burriss1@bridge.bellsouth.com;
Sandra.Jones5@bridge.bellsouth.com
Subject: LCSC backlog

Jill,

I wrote this on Monday and thought I sent it to you but I just found it in my
out box -- sorry.

I talked to Ron Moore today about the FOC backlog that AT&T has experienced in
the last two weeks.

Ron attributed the MediaOne fall-out and backlog to a directory listings problem in our LEO system. There was also a problem with inappropriate usage
of commas in MediaOne's LSRs that caused additional orders to fall-out for manual handling. The LCSC could not easily handle the large number of orders
that required manual handling.

This past week, order volume overwhelmed the center. After working this past Saturday, Ron feels that by close of business today they will have recovered and will be current on their pending LSRs.

To address the order volume issues, the LCSC will add 20 service reps to its staff on November 13th and will add another 20 in December.

I hope this information minimizes AT&T's concerns on recent FOC cycle-time.

Thanks,

Jan

TRA Docket No. 00-00079
JMB-34
Page 2 of 2

AT&T

Robert W Quinn, Jr.
Director - Federal Government Affairs

Suite 1000
1120 20th St . NW
Washington. DC 20036
202 457-3851
FAX 202 457-2545

EX PARTE OR LATE FILED

December 23, 1998

RECEIVED

DEC 23 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Ex parte - CC Docket No 98-121
Second Application of BellSouth Corporation,
BellSouth Telecommunications, Inc , and
BellSouth Long Distance, Inc., for Provision of
In-Region, InterLATA Services in Louisiana

Dear Ms. Roman Salas:

Today, Steve Garavito, Al Lewis, Pam Nelson, Jay Bradbury, Jim Hill (via telephone) and I of AT&T, and I met with Michael Pryor, Jake Jennings, Andrea Kearney, Claudia Pabo and Claudia Fox of the Common Carrier Bureau, as well as representatives from BellSouth and MCI. At the request of Commission staff, AT&T reviewed its position of record in this proceeding with an emphasis on the need for a nondiscriminatory interface for maintenance and repair. AT&T reviewed the support for the position AT&T has taken in its filings in this docket using the enclosed materials In sum, AT&T reasserted the position that it today has two choices for repair and maintenance operations in BellSouth territory given BellSouth's interface options: 1) choose to use an interface that provides significantly less functionality than BellSouth's own retail representatives enjoy (ECTA), or 2) choose two interfaces to achieve the same functionality as BellSouth's retail representatives enjoy (TAFI). Under the second option, the new entrant faces the dual entry issues (increased errors and cost) previously identified by the Commission as the reason machine-to-machine interfaces are required for pre-ordering/ordering functions

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Two copies of this Notice are being submitted to the Secretary of the Commission in accordance with Section 1.1206(b)(1) of the Commission's Rules.

Very truly yours,

Robert W. Drinnon, Jr.

Enclosures
cc: Mr. M. Pryor
Mr. J. Jennings
Ms. A. Kearney
Ms. Claudia Pabo
Ms. Claudia Fox
Ms. Karen Reidy (MCI)
Mr. Robert Blau (BellSouth)

Tab A

MAINTENANCE AND REPAIR INTERFACE REQUIREMENTS

AT&T Discussion Aids
for

Discussion Among FCC Staff, AT&T, MCI and BellSouth

December 23, 1998

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Q. Is it necessary to maintain your own database for trouble history given that same information is contained in BellSouth's databases which is accessible through TAFI?

- Yes. It is vital to view the maintenance and repair process from the correct perspective.

- The customer reporting a trouble is the CLEC's customer and the process being invoked is the CLEC's process, not BellSouth's.

- A customer's trouble must first be input to and satisfy the CLEC's process **before** it can transfer to BellSouth's process.

- AT&T's customer can be calling to report a trouble condition in one of six major product categories:
  - Local
  - Long Distance
  - Wireless
  - Video
  - Internet
  - Data

- Within Local AT&T's customers can be reporting troubles associated with services provided by a number of ILECs, CAPS, other vendors or even AT&T itself through:
  - Resale
  - Unbundled Network Elements
  - Facilities Based Interconnection

- Only the maintenance of trouble history within the CLEC's own database can allow the CLEC's business processes to function effectively and efficiently.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Q. Absent a machine to machine interface for repair and maintenance, what specific information would your repair representative be required to enter into your own back office systems?

R. How much additional time would this take and is it necessary that an end user is on-line while such information is entered into your back office system?

- Once again it is vital to view the maintenance and repair process from the correct perspective.

- The customer reporting a trouble is the CLEC's customer and the process being invoked is the CLEC's process, not BellSouth's.

- A customer's trouble must first be input to and satisfy the CLEC's process **before** it can transfer to BellSouth's process.

- The end user is thus required to be on-line while information is entered into the CLEC's maintenance and repair system

- The end user is not required to be on-line during the dual entry process necessary to populate the repair ticket in BellSouth's TAFI system and transfer any information provided by the TAFI functionality back into the CLEC's system and process. The additional time necessary to complete this process is however part of the repair duration interval experienced by the CLEC's customer.

- A machine to machine interface would eliminate dual data entry and allow the useful TAFI functionality to be available to the CLEC with the customer still on-line.

- The information which has been input once into the CLEC's process and must be input a second time into BellSouth's TAFI includes the following: (for resale, and any arrangement utilizing a BellSouth UNE port, or a ported BellSouth line number)

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

- Telephone Number
  - Must also perform visual inspection to insure service address presented from LMOS matches that presented from CRIS and correct LMOS if it is in error.
- Line In Use Indicator
- Type of Trouble (a series of menus and sub-menus – see page 4)
- Reach Number
- Remarks Regarding the Reach Number if Necessary
- Access Numbers
- Referred By Name
- New Commitment (Appointment) Time
- Access Hours
- Out of Service / Affecting Service Indicator
- Customer Date and Time of Desired Commitment
- Notes
- Category Indicator – Customer Direct/Customer Excluded
- Irate Indicator
- Customer Comments
- Additional Narrative for LMOS
- Date and Time Received

- During the creation of the TAFI input the TAFI functionality may / will most likely provide useful information which must be input to the CLEC's system. Examples include:
  - Trouble Description Codes
  - Commitment Date Recommendations
  - Pending Service Order Information
  - Pending Trouble Report Information
  - Test Results

- Having created a TAFI trouble report the CLEC now owns that trouble report and must monitor its status and perform all necessary actions to close the TAFI trouble ticket when the trouble is resolved, and the duplicate trouble ticket in their own system.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Type of Trouble
Main Menu

Dial Tone
Outgoing
Incoming
Transmission
Memory Call
Memory Services
Calling Plan / Billing
Long Distance
Physical
Data
Enhanced Services

} Individual Sub-Menus

Dial Tone
Sub-Menu

No Dial Tone
At Times No Dial Tone
Slow Dial Tone
Can't Break Dial Tone
Dial Tone After Dialing Number
Busy / Reorder / Recording Pickup

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Please provide and discuss any studies quantifying the additional costs imposed due to lack of integration for repair and maintenance functions.

- See Tab 11. In May and June of 1997 AT&T received training on TAFI and conducted a trial of the system comparing functionality and estimating the incremental cost of its use. Four methods of operation were considered.
  - TAFI as a stand alone process
  - TAFI in conjunction with AT&T's Actiview based process
  - AT&T's Standard Process – Actiview + phone call to BellSouth
  - Actiview with Electronic Bonding

- An **additional cost** of 2.4 agents per 100,000 access lines was identified as the penalty for dual entry to TAFI resulting from approximately 3 minutes additional agent work per trouble ticket.

- In contrast Electronic Bonding was estimated to yield a 15 to 19 minute **reduction** in agent work per trouble ticket.

- The additional cost of TAFI, the reduction in cost associated with EBI, and a number of other factors concerning the availability of data to support business unit and regulatory reporting requirements lead to the decision not to implement TAFI even as an interim process. This decision was communicated to BellSouth on July 21, 1997. See Tab 12.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Q. Other than a machine to machine interface for repair and maintenance, are there any other methods to retrieve information necessary for your own back office system?

- Once again it is vital to view the maintenance and repair process from the correct perspective.

- The customer reporting a trouble is the CLEC's customer and the process being invoked is the CLEC's process, not BellSouth's.

- A customer's trouble must first be input to and satisfy the CLEC's process **before** it can transfer to BellSouth's process.

- In the absence of a machine to machine interface for maintenance and repair useful and mechanically retrievable information while the CLEC is in contact with its customer can only come from the CLEC's back office systems and databases.

- Information residing in BellSouth's legacy systems accessed by TAFI or used in the CLEC's other OSS processes is only available to the repair agent on a manual basis in a manner analogous to the predicament facing BellSouth's maintenance analyzers pre-TAFI.
  - The repair agent must know which supplemental system to use
  - The repair agent must possess the experience to analyze and use the information gathered
  - The repair agent must provide consistent resolutions and/or recommendations.

- Today's **EBI or ECTA** Interface is limited in scope and simply **delivers trouble tickets** electronically to BellSouth **for manual processing by BellSouth** in exactly the same manner described to AT&T by BellSouth in April 1996:
  - BellSouth Maintenance Administrators clear an average of 9 tickets an hour, while BellSouth Customer Service Analysts using TAFI clear as many as 17
  - TAFI clearing times are routinely less than 40 minutes, while LMOS clearing times are greater than double that of TAFI.
  - EBI/ECTA tickets may wait in the manual screening pool for a considerable period of time before being picked up.

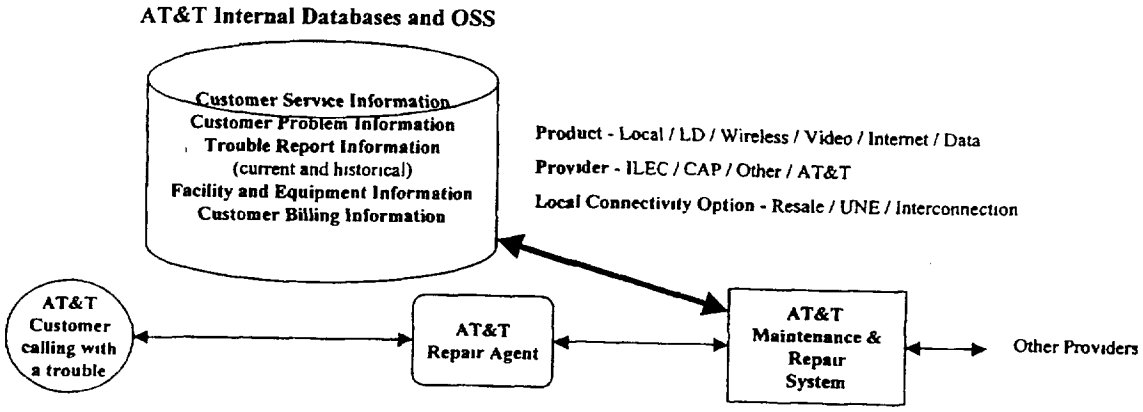
MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

- Remember that the EBI process only allows you to:
  - Enter a report
  - Modify data on an existing report
  - Receive status messages during the life of the report
  - Someone at BellSouth still has to manually "screen" the report to figure out what to do to fix it (Gene Piatkowski, January 28, 1998)

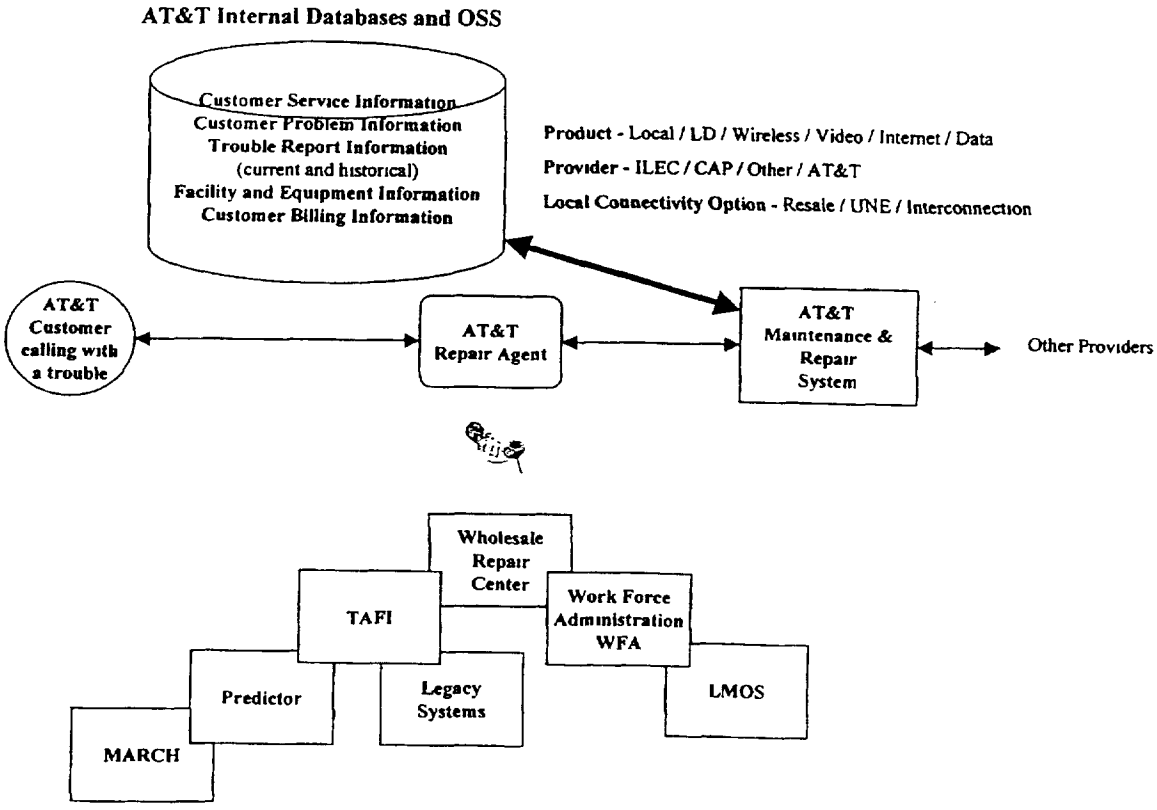
- EBI/ECTA without access to TAFI functionality is conceptually equivalent to non-integrated pre-ordering and electronic ordering without flow-through.

Tab B

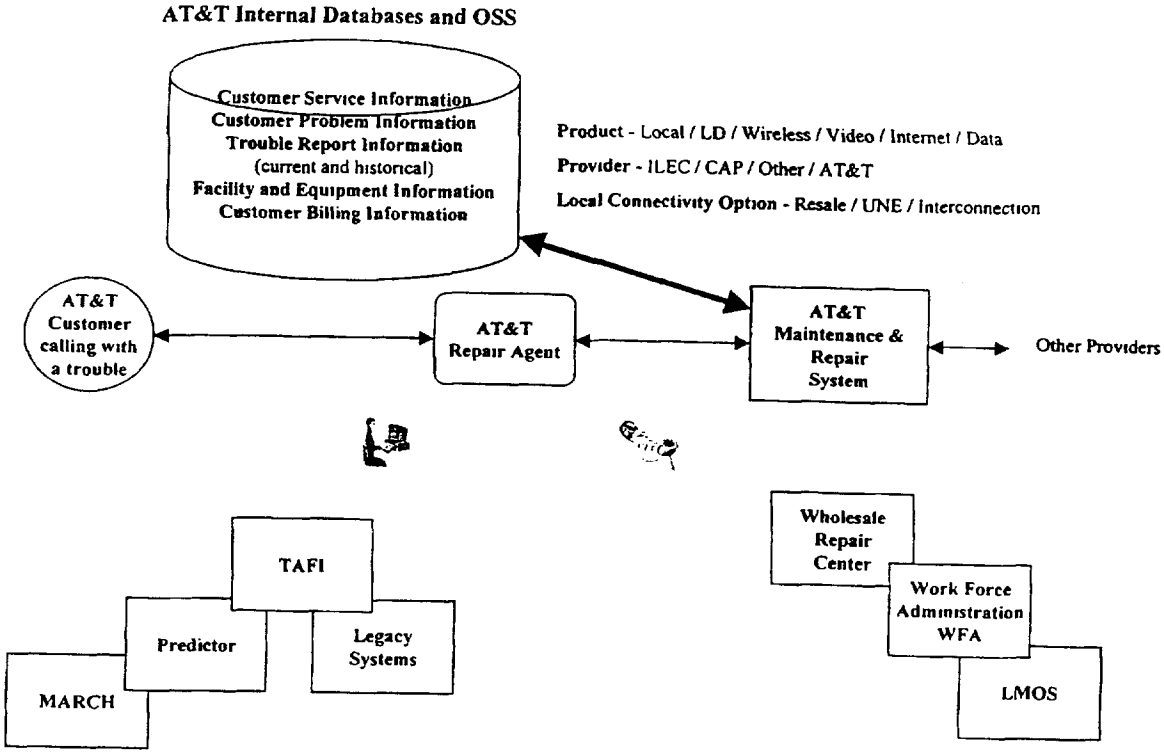
AT&T Maintenance Process



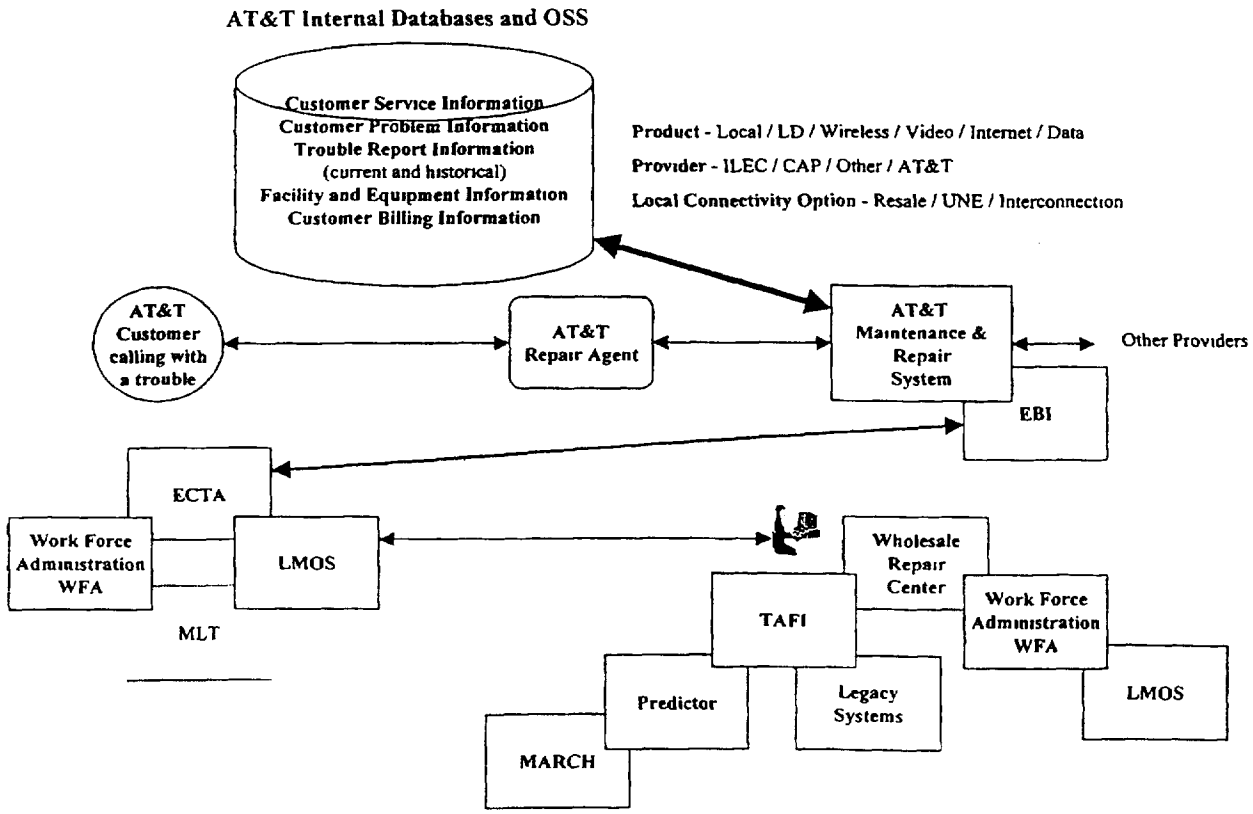
AT&T "Standard" Maintenance Process with BellSouth



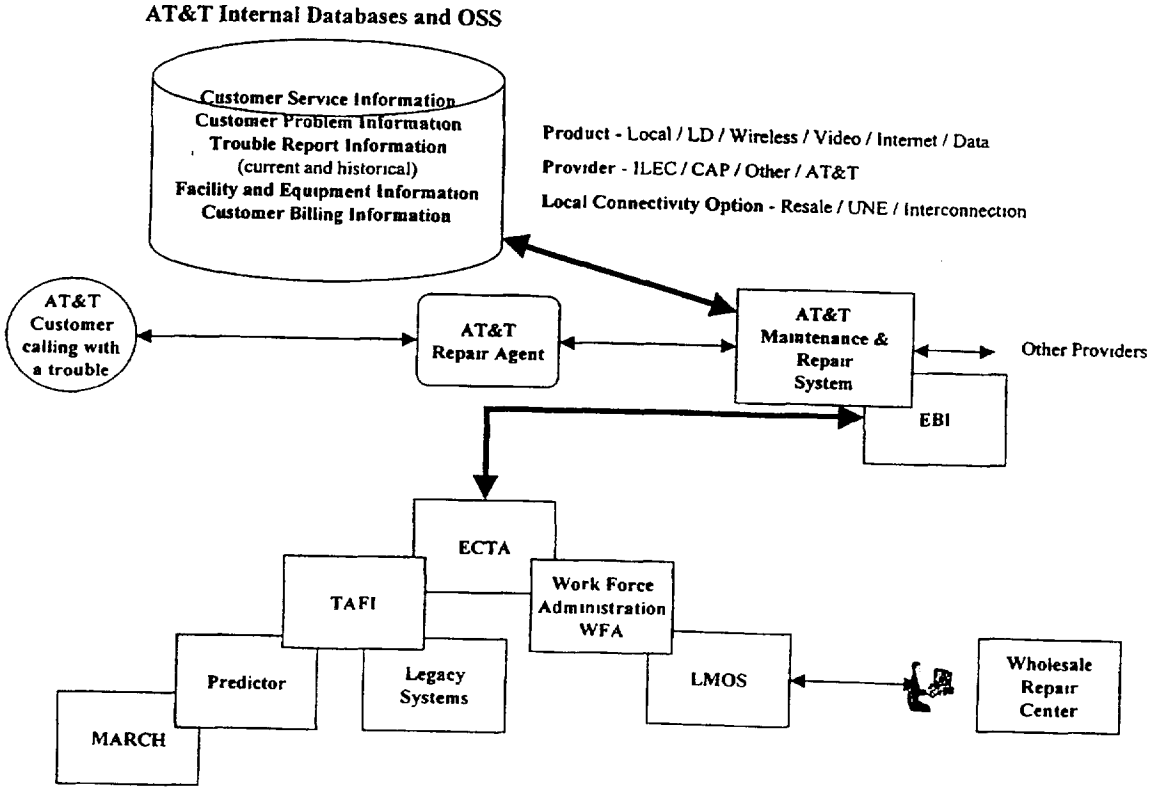
AT&T "Actiview + TAFI" Maintenance Process with BellSouth



AT&T "EBI/ECTA" Maintenance Process with BellSouth



A Machine to Machine Maintenance Process with BellSouth



Tab C-1

Electronic Bonding Interface (EBI, a.k.a. ECTA) Negotiation and Implementation Chronology

Dates	Activity
August 1995 – March 1996	Negotiations under Georgia Act – AT&T Requirements establish EBI as the goal with interim arrangements until full deployment BellSouth estimates availability of such an interface in 1Q96 will provide parity with BellSouth's maintenance and repair operations (Tab 1 and Tab 2, Items 1 B.1.a-e and 1 B 16-17)
December 21, 1995	AT&T files "Resale" Petition with GA PSC (Docket 6352-U)
April 1996	New BellSouth negotiators contradict claims of previous representatives, and explain the superior capabilities of TAFI AT&T requests EBI access to TAFI (April 29, 1996 letter) (Tab 3)
June 11, 1996	GA PSC Order in Docket 6352-U requires establishment of AT&T's requested electronic interfaces by July 15, 1996, and the submission of a joint status report within 30 days (Tab 4, Pages 11,12 and 16)
June 21, 1996	BellSouth files a unilateral report with the GA PSC Cites availability of existing Inter-Exchange Carrier EBI and reports investigation of TAFI reveals that TAFI via EBI could be provided in 1997 at a cost of $3 million (Tab 5, Pages 14-15)
July 11, 1996	GA PSC Order in Docket 6352-U supplements the Electronic Interface portions of its June 11, 1996 Order BellSouth directed to provide the technical specifications for TAFI via EBI by August 31, 1996, and complete implementation by March 31, 1997 (Tab 6, Page 5)
August 9, 1996	BellSouth's Technology Specification included in the August Surveillance Report to the GA PSC describes a web server based interactive direct trouble report entry system rather than TAFI via EBI This proposal is never implemented (Tab 7, pages 18-21)
August 12, 1996	Mrs. Gloria Calhoun files testimony in FPSC Docket 960833-TP describing the work BellSouth will be doing at AT&T's request to add to the existing electronic trouble reporting interface (EBI) "the capability for the ALEC to access the same interactive testing sequence that BellSouth follows to screen trouble reports " (TAFI), by March of 1997 at a cost of $3 5 million (Tab 8, Beginning at Page 43, Line 18)

Dates	Activity
3Q 1996 / 1Q 1997	Negotiation dialogues continue BellSouth never produces a specification for TAFI, TAFI functionality via EBI, or EBI for Local Services per the T1M1 Standard In October, AT&T provides BellSouth with our specifications reflecting EBI for Local Services per the T1M1 Standard BellSouth ultimately agrees to begin implementation planning under AT&T's specifications, including the provisioning of a portion of the MLT testing functionality available through TAFI, the initial meeting is held February 26/27, 1997
4Q 1996 / 1Q 1997	Interconnection Agreement negotiations result in agreement to and approval of Attachment 15, "Interface Requirements for Ordering and Provisioning, Maintenance and Repair and Pre-Ordering " All interfaces under this agreement are to be machine-to-machine (Section 4 6) and the interface for Maintenance and Repair is described as EBI (Section 6 2)
March 31, 1997	BellSouth allows direct access to CLEC TAFI (Tab 9)
April 1997	FCC Two Day Forum on 271 Issues Mrs Calhoun responds to Mr Bradbury's question as to if and when BellSouth will provide access to TAFI functionality via EBI by stating that such a capability would be a "violation" of the standard
May 1997	BellSouth commits to implementation of EBI for Local Services per the T1M1 Standards and other requirements provided in AT&T's specifications with testing to begin in October of 1997 Provisioning of full MLT access (and other TAFI functionality) is deferred to "an enhancement in early 1998" (Tab 10, Page 3)
June 1997	AT&T evaluates TAFI as a possible interim interface Additional cost of 2 4 agents per 100,000 access lines is determined to add TAFI to existing process for dual data entry This cost and other considerations (pending availability of EBI, business and regulatory reporting requirements) result in a decision not to utilize TAFI (Tab 11, Tab 12)
3Q 1997 – 1Q 1998	EBI implementation activities continue Both parties encounter delays in the development and testing processes Turn-up in a production mode occurs in February 1998

Dates	Activity
March 1998	Mr William Stacy testifies that "AT&T's request recognizes that TAFI is superior to the national standard EBI interface, and that adding TAFI's functionality to EBI is a goal worth pursuing, and I agree " (Tab 13, Direct Testimony Page 40, Line 19-21 and Transcript Page 192-3)
March 18, 1998 – April 3, 1998	AT&T evaluates EBI a.k a ECTA System performance resulted in resource savings per trouble ticket AT&T makes determination to suspend further implementation and development until the number of local customers makes utilization of this interface cost-effective BellSouth is notified on April 9, 1998 (Tab 14)

Tab C-2

DRAFT - Version 2

Book 19 / Tab 2

AT&T Communications, Inc.
Loop Unbundled w/Interconnection Planning Document
for
Network Services, Network Operations, Billing and CARE, and Pricing and Compensation
in the
Local Exchange Service Marketplace

Proprietary and Confidential Information
Subject to a BellSouth and ATT
nondisclosure agreement and should not be shared except as provided thereto

I. Network Operations

In a Loop Unbundled Resale environment, AT&T will be providing it's own switching and a portion of the local facilities will belong to AT&T. It is AT&T's goal to have a working Electronic Bonding Interface (EBI) available and to bond with as many suppliers as is practical. This form of electronic communication will facilitate the Service Ordering, Provisioning and Maintenance processes.

A real time ordering and provisioning interface using electronic bonding is essential to provide AT&T operational parity with existing BellSouth customer ordering processes. Such an interface is also required for BellSouth to comply with existing legislation and regulatory rules in many states.

The requirements of Local Number Porbability place a unique challenge on the Service Ordering and Provisioning processes. These requirements, while not completely determined as yet, are refered to within the framework of this agreement. Addressing a process that is not yet completely established is always dangerous due to the possibility that some key component may be omitted. AT&T requests that BellSouth keep this in mind when reading the sections of this document which relate to Local Number Portability, and be flexible in responding to those sections.

In the interim, the use of Remote Call Forwarding (RCF) as a means of limited geographic portability has been proposed. AT&T realizes that there are some drawbacks inherent in the use of RCF for this purpose and that some feature functionality can be lost. However, when a Customer changes local carriers and wants to retain their existing local telephone number a solution must be offered.

As a Service Provider, AT&T recognizes the value of servicing our products quickly and how important it is to assure our Customers that the problem will be fixed the first time. Any product or service which carries the AT&T brand must meet AT&T's requirements for prompt, friendly and efficient Customer service. To that end this section of the agreement deals with Maintenance in a Loop Unbundled Resale environment.

It is our intention to provide AT&T Customers with a single telephone number which they can call 24 hours a day, 7 days a week for the repair of their service. Logistically this presents some challenges to the current arrangement they may have with their local service. It is AT&T's desire that these challenges be transparent to the AT&T end-user and that BellSouth and AT&T work out any problems in the "Front End" process.

As with the Service Ordering and Provisioning process, AT&T would like to migrate to a standard EBI interface between the two companies. However, since BellSouth may not be ready to migrate to this platform in the time frame required we may need to establish an interim agreement which is based on some type of workable electronic interface.

Proprietary And Confidential Information
Subject to a BellSouth and AT&T
nondisclosure agreement and should not be shared except as provided thereto.

I. Network Operations (Cont'd)

If a full EBI interface is not available, we will need to develop an interim solution. One potential would be for BellSouth to provide a direct interface into the current BellSouth trouble reporting and tracking system which could be accessed from AT&T's work center. Another option could entail a gateway interface. BellSouth could provide AT&T with the interface specifications and AT&T could potentially build a gateway between its existing trouble ticketing system and the BellSouth system. These are just two possible methods of operation, AT&T is more than willing to discuss any viable options presented by BellSouth in response to this Loop Unbundled Resale agreement.

In addition to an electronic interface required to provide "real time" status to AT&T's end-users the use of the AT&T brand is especially important. To that end, AT&T would like to discuss the options for the repair service in connection with provisioning and repairing service to AT&T end-users. It is understood that this is a very sensitive issue and we are willing to work with BellSouth to meet this requirement

Proprietary And Confidential Information
Subject to a BellSouth and AT&T
nondisclosure agreement and should not be shared except as provided thereto.

B. Maintenance Procedures

1. BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process for Business and Residential (switched and special services):

a. Trouble Ticket entry and update capabilities
b. Review and verify test results
c. Provide status updates on current "Open" Trouble Tickets
d. Verify feature and function updates and corrections as they relate to an open Trouble Report
e. Provide a means for Network Surveillance (Performance Monitoring)
f. Provide dispatch status as well as location and ETA.

2. Provide AT&T the ability to verify and acknowledge any scheduled appointment upon receipt of the Trouble Ticket for dispatch out and customer premises when applicable.

3. BellSouth will meet the following status requirements on AT&T services:

a. Immediate notification of any changes in trouble status, electronically
b. The ability to retrieve the current status of any open trouble report
c. Immediate notification when any scheduled appointment is in jeopardy

4. BellSouth will close all TOK (Test OK), NTF (No Trouble Found), and CC (Came Clear) trouble reports.

5. BellSouth will close the trouble by contacting the AT&T work center, AT&T in turn will be responsible for contacting the end-user customer.

6. BellSouth will notify AT&T immediately of any potential Network event that could have an impact on AT&T Customer's service performance. This includes any situation where AT&T leased elements are functioning on back up or emergency power.

7. BellSouth will provide AT&T with prior notification with the option for rescheduling, of any scheduled maintenance activity which has an impact on an AT&T Customer's service.

8. BellSouth technicians will clear any reported trouble to the established network interface.

9. AT&T requires the ability to test all facilities including the SLC.

Proprietary And Confidential Information
Subject to a BellSouth and AT&T
nondisclosure agreement and should not be shared except as provided thereto.

B. Maintenance Procedure (Cont'd)

10. BellSouth will report all associated maintenance and service charges at the time the trouble ticket is closed with the AT&T service center.

11. BellSouth and AT&T will negotiate a mutually acceptable escalation and expedite procedure for all services provided by BellSouth under this agreement.

12. BellSouth and AT&T will agree to a trouble priority and process for all trouble reports handled between the two companies.

13. AT&T and BellSouth will negotiate mutually acceptable performance metrics which will apply to the network elements which AT&T leases from BellSouth.

14. BellSouth will provide AT&T with the ability to "pre-screen" any activities which would incur charges to AT&T in order for AT&T to validate the activity. This includes, but is not limited to the dispatch of field forces to an AT&T end-users premises.

15. AT&T requires an established Disaster Recovery plan with BellSouth.

16. BellSouth will provide the AT&T work center with "real time" test results on any AT&T end user service.

17. BellSouth agrees to route repair service calls to the correct service provider (AT&T), with same dialing parity as BellSouth.

18. BellSouth will bill any applicable Time and Materials charges to AT&T, not to the end user.

19. BellSouth agrees to provide a listing of all applicable charges at the time the Touble Ticket is closed.

20. BellSouth and AT&T agree to discuss the contracting of BellSouth technicians to perform work on AT&T end-user Customer's premises representing AT&T. This includes but is not limited to:

a. Providing the contracted technicians with AT&T forms for the end-user
b. Providing the contracted technicians with "branded" AT&T "Not at Home" cards
c. Providing the contracted technicians with AT&T business cards
d. Assuring that the technicians are trained in a non-discriminatory fashion

Proprietary And Confidential Information
Subject to a BellSouth and AT&T
nondisclosure agreement and should not be shared except as provided thereto.

Tab C-3

Network Operations

Total Issues in Category: 61

Service Ordering and Provisioning

1.A.1

Issue Status: Pending ←BellSouth→ / Escalated ←AT&T→
Contacts: Welch & Higdon
Class : OBF, OI, EC
Start 3/11/96
Finish 5/1/96

A Provide AT&T with real time electronic means to transfer order information from AT&T to BellSouth and vice-versa

B

C BellSouth Interim Plan

Long Term Plan
OBF; Electronic Communications solution being evaluated by BellSouth.

D Action Item 1
Evaluate EDI interface proposed by AT&T
Contact: BST-Massey

Action Item 2
Complete Business Case
Contact: BST-Massey

Action Item 3
Contact:

Action Item 4
Contact:

E

1.A.2.a

Issue Status: Pending ←BellSouth→ / Escalated ←AT&T→
Contacts: Higdon
Class : OBF, OI, EC
Start 3/11/96
Finish 5/1/96

A BellSouth will provide AT&T with a real time response for Firm Order Confirmation (FOC)

B

C BellSouth Interim Plan
BellSouth will return FOCs via daily FAX; This will be done periodically throughout the day. SmartFAX will enhance this process.

Long Term Plan
OBF; BellSouth is evaluating a Electronic Communications solution.

D Action Item 1
See 1.A 1
Contact:

Action Item 2
Contact:

Action Item 3
Contact:

Action Item 4
Contact:

E

DRAFT - FOR DISCUSSION PURPOSES ONLY - NON BINDING DOCUMENT
Proprietary and Confidential Information
Subject to a BellSouth and AT&T nondisclosure agreement

Maintenance Procedures

1.B.1.a

Issue Status: Pending ←BellSouth→ Obtainable ←AT&T→

Contacts: Raulerson

Class:

Start:

Finish

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process Trouble Ticket entry and update capabilities

B AT&T needs information on whether contact numbers provided in handbook are dialable from outside the state

C BellSouth Interim Plan

Interim: BellSouth will provide contact numbers for the appropriate end users centers, see reseller handbook Long Term: BellSouth is evaluating electronic bonding solutions for time & cost; resolution will require forecasts of volume and timing from AT&T.

Long Term Plan

D Action Item 1 — Contact:

BellSouth will denote which numbers are accessible outside of state (1/15/96)
BellSouth will determine how business repair calls are directed after dialing the 800 number

Action Item 2 — Contact:

Action Item 3 — Contact:

Action Item 4 — Contact:

E

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A AT&T Initial Resale Expectation	B Clarified Expectation	C BellSouth Resale Plan	D Action Items

1.B.1.b

Issue Status: Pending ←BellSouth→ Escalated ←AT&T→

Contacts: Rauleson; Bradbury (Imperato)

Class:

Start:

Finish:

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process: Review and verify test results.

B AT&T wants to do their own testing based on customer inquiry On close out need disposition and cause codes (DMOQ Issue) AT&T will check on prescreening.

C BellSouth Interim Plan

BellSouth expects AT&T to adhere to its prescreening procedures on repair calls until such times as an electronic interface is established; estimated availability 1Q96.

Long Term Plan

E

D Action Item 1 — Contact:

This generally is dependent upon the electronic interface. In the interim,AT&T will incorporate BellSouth's prescreening guidelines in its scripts AT&T will provide scripts to BellSouth by 1/3/95 BellSouth will evaluate provision of disposition and cause codes by January meeting BellSouth will provide copy of FL order on out-of-service question. Need further discussion with EB SMES

Action Item 2 — Contact:

Action Item 3 — Contact:

Action Item 4 — Contact:

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A AT&T Initial Resale Expectation	B Clarified Expectation	C BellSouth Resale Plan	D Action Items

1.B.1.c

Issue Status		Contacts		
Pending	←BellSouth→	Rauleson	Class:	Start
Obtainable	←AT&T→	Bradbury (Shirley)		Finish:

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Provide status updates on current "Open" Trouble Tickets.

B AT&T wants proactive notification of status (Not necessary if EB)

C BellSouth Interim Plan

AT&T's end users will be treated as any other BellSouth customer - -until an electronic interface is established, appropriate BellSouth maintenance personnel will call AT&T if necessary (i.e., jeopardies and missed appointments).

Long Term Plan

E

D Action Item 1 — Contact:

BellSouth will determine if there are any differences between handling of single customers vs large complex customers and will provide any available documentation on the differences. Further discussion is required For national accounts BellSouth uses "SIMS" which has timers for statusing (where does SIMS reside & is it part of EB Confirm that EB provides access into computer EU systems) TAFI/LMOS don't have timers like those used by WFA-controlled special services Gee· How would BellSouth classify new customers? (lines & revenue)? 1/31/95. Shirley AT&T will provide clarification on classes of customers for which proactive notification is needed

Action Item 2 — Contact:

Action Item 3 — Contact:

Action Item 4 — Contact:

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1.B.1.d

Issue Status: Pending ◄–BellSouth–► / Escalated ◄—AT&T—►

Contacts: Raulerson

Class :

Start:

Finish

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process Verify feature and function updates and corrections as they relate to an open Trouble Report

B If BellSouth confirms installation and AT&T receives a trouble report relative to a feature or function, AT&T wants to review initial order to insure that the service was installed

C BellSouth Interim Plan

In the Interim, BellSouth will handle these inquiries as it does for its end users. The resolution of this issue is dependent upon the electronic interface.

Long Term Plan

D Action Item 1

BellSouth will provide documentation or guidelines on how this is handled today Further discussion is required. AT&T wants access to determine whether feature was translated, but BellSouth's technicians don't have that access today After trouble ticket is open, BellSouth repair will resolve internally Need to establish processes to resolve service order discrepancies Other information will be provided via electronic interface through trouble codes

Contact:

Action Item 2

Contact:

Action Item 3

Contact:

E

Action Item 4

Contact:

1.B.1.e

Issue Status: Pending ◄–BellSouth–► / Escalated ◄—AT&T—►

Contacts: Bradbury (S-Shirley)

Class EC

Start: 3/11/96

Finish 4/15/96

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process: Provide a means for notifying AT&T of switch failures

B AT&T wants notification of major service outages to allow them to screen related trouble calls With electronic interface to LMOS, outages would be identifiable and restoral time available

C BellSouth Interim Plan

Long Term Plan

D Action Item 1

Contact:

Action Item 2

Contact:

Action Item 3

Contact:

E

Action Item 4

Contact:

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A AT&T Initial Resale Expectation | B Clarified Expectation | C BellSouth Resale Plan | D Action Items

1.B.1.f

Issue Status: Pending ←BellSouth→ / Escalated ←AT&T→
Contacts: Massey / Bradbury (Taber)
Class: EC
Start: 3/11/96
Finish:

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Provide dispatch status as well as location and ETA.

B Prior to electronic interface, AT&T wants ability to call BellSouth for status

C BellSouth Interim Plan
Long Term Plan

D Action Item 1 — Contact:
Action Item 2 — Contact:
Action Item 3 — Contact:
Action Item 4 — Contact:

E

1.B.1.g

Issue Status: Pending ←BellSouth→ / Escalated ←AT&T→
Contacts: Massey
Class: EC
Start: 3/11/96
Finish: 5/1/96

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Testing

B Expectation applies to SMAS access for special services circuits and MLT access for POTS

C BellSouth Interim Plan
Long Term Plan

D Action Item 1 — Contact:
Action Item 2 — Contact:
Action Item 3 — Contact:
Action Item 4 — Contact:

E

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A AT&T Initial Resale Expectation	B Clarified Expectation	C BellSouth Resale Plan	D Action Items

1.B.15

Issue Status: Pending ◄-BellSouth-► Obtainable ◄—AT&T—►

Contacts:

Class :

Start:

Finish:

A BellSouth will provide an on-line transfer of any AT&T end-user "misdirected" trouble call to the AT&T repair center

B

C BellSouth Interim Plan

BellSouth will refer end user to their local service provider and will provide the number upon request, if BellSouth has number available.

Long Term Plan

E

D Action Item 1

AT&T will provide number to BellSouth. AT&T evaluating single number solution.

Contact:

Action Item 2

Contact:

Action Item 3

Contact:

Action Item 4

Contact:

1.B.16

Issue Status: Pending ◄-BellSouth-► Obtainable ◄—AT&T—►

Contacts:

Class :

Start

Finish

A AT&T and BellSouth will negotiate performance metrics for Service repair

B

C BellSouth Interim Plan

BellSouth believes discussions regarding metrics are premature until processes are in place. BellSouth will provide same level of service as provided to its end users.

Long Term Plan

E

D Action Item 1

Contact:

Action Item 2

Contact:

Action Item 3

Contact:

Action Item 4

Contact:

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A AT&T Initial Resale Expectation	B Clarified Expectation	C BellSouth Resale Plan	D *Action Items*

1.B.17

Issue Status
Pending ◄–BellSouth–► Obtainable ◄—AT&T—►

Contacts: Raulerson

Class :

Start:
Finish.

A Provide AT&T with an "escalation" and "expedite" process for Maintenance.

B

C BellSouth Interim Plan

BellSouth's objective is to provide resellers with the same quality service it provides its end users.

Long Term Plan

D Action Item 1

Will be addressed in work center discussions. BellSouth will evaluate template provided by AT&T. BellSouth will provide expedite procedures.

Contact:

Action Item 2

Contact:

Action Item 3

Contact:

E

Action Item 4

Contact:

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Tab C-4

AT&T

Southern Region

Jay M. Bradbury
Manager

Room 12W47
Promenade II
1200 Peachtree St., NE
Atlanta, GA 30309
404-810-8005

April 29, 1996

Suzie Lavett
BellSouth
Room E5G 3535 Colonnade Parkway
Birmingham, Alabama 35243

VIA FACSIMILE

Dear Suzie:

RE: Local Maintenance Electronic Bonding

Until recently, BellSouth has repeatedly asserted that, with the exception of testing, they were ready to implement an interface that would provide capabilities to AT&T's work centers that were at parity with those available to BellSouth's Residence Repair Centers (RRC) and Business Repair Centers (BRC), by using the existing DXC EB Gateway.

During our April 17, 1996, Total Services Resale Maintenance Meeting, we had significant discussion concerning BellSouth's provisioning and development of local maintenance electronic bonding. Bob Anderson's description of the capabilities of the electronic bonding as being several steps backwards from the existing capabilities in BellSouth's centers was in sharp contrast to BellSouth's previous assertions.

Bob's description of the status and plans for local maintenance electronic bonding clearly does not represent an existing or planned interface designed to provide AT&T's centers and end users with a parity maintenance and repair experience. The disparity Bob describes places AT&T in a grossly disadvantaged position, and is totally unacceptable.

Bob stated that 82% of repair requests handled in the RRCs are entered into and flow through the Trouble Analysis Facilitation Interface (TAFI) system. Bob reported that TAFI provided real or near real-time interfaces to many other systems and databases in BellSouth, including various testing systems, CRIS, BOCRIS, PREDICTOR, and others which allow verification and testing of customer records, features, translations, facilities, etc. Bob indicated that clearing times using TAFI were routinely less than 40 minutes, and that using TAFI a Customer Service Analyst (CSA) could clear as many as 17 tickets an hour.

Bob said the remaining 18% are handled from a manual screening pool using the Loop Maintenance Operations Support (LMOS) system. Bob reported that requests in the manual screening pool might wait up to 2½ hours before being picked up for screening and testing. Bob stated that using LMOS a Maintenance Analyst (MA - a higher pay grade employee) could only clear 9 tickets an hour and that average clearing time was greater than double that of the TAFI tickets.

Bob reported that the existing and planned local maintenance electronic bonding interface to the RRCs and BRCs was only to LMOS, not to TAFI, and that therefore AT&T customer's reports would all be handled from the manual screening pool. This will not meet AT&T's requirements or provide parity for AT&T customers.

As I reported, AT&T has recognized the complexity and level of design effort necessary to implement a new local maintenance electronic bonding interface to the newest generation of operations support systems being provided in its own local work centers, and the potential for local maintenance volumes to exceed the

capacities of the existing IXC EB Gateway facilities. AT&T's implementation schedule does not call for the testing or use of local maintenance electronic bonding until late 4Q96 or possibly 1Q97, well after we have entered the local market.

We recommend that BellSouth utilize this additional interval to redesign its interface to provide AT&T with access to the TAFI system, and any future systems BellSouth might deploy, to provide parity for AT&T customers.

During the interim period methods and procedures for a telephonic work center to work center interface which will allow BellSouth to enter and clear AT&T customer's troubles using TAFI can be negotiated. AT&T believes an interim arrangement can be negotiated which will be acceptable to AT&T, more efficient for BellSouth than the LMOS only interface it has designed, and not disadvantage AT&T customers.

At our May 2, 1996, meeting AT&T expects BellSouth to commit to develop and implement for testing on December 2, 1996, a local maintenance electronic bonding interface providing capabilities to AT&T's work centers, including testing, that were on parity with those available to BellSouth's Residence Repair Centers (RRC) and Business Repair Centers (BRC). Further AT&T expects BellSouth to be able to commit to interim telephonic methods and procedures for the interval from the planned start of joint local market entry interface testing on July 1, 1996, until local maintenance electronic bonding is fully implemented.

Yours truly,

Jay M. Bradbury

cc: AT&T Core Team

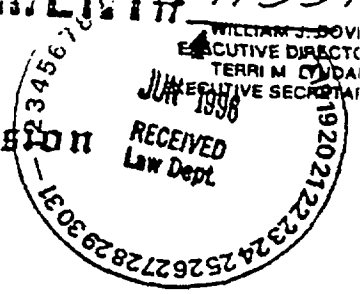
Tab C-5

cc: RB, LB(Trish), BS

DOCKET# 6352
DOCUMENT# 11331

COMMISSIONERS:
DAVE BAKER CHAIRMAN
ROBERT B (BOBBY) BAKER
MAC BARBER
BOB DURDEN
STAN WISE





Georgia Public Service Commission

244 WASHINGTON STREET SW
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(404) 656 4501 OR 1 (800) 282 5813

DOCKET NO. 6352-U

IN RE: Petition of AT&T for the Commission to Establish Resale Rules, Rates, Terms and Conditions and the Initial Unbundling of Services

Record Submitted: March 4, 1996
March 5, 1996
April 1, 1996
April 2, 1996
April 3, 1996

Decided: May 29, 1996

RECEIVED
JUN 11 1996
Executive Secretary
Ga. Public Service Commission

APPEARANCES

On Behalf of the Commission Staff:

Nancy Gibson, Special Assistant Attorney General
David L Burgess, Director, Rates and Tariffs

On Behalf of the Consumers' Utility Counsel:

Jim Hurt, Attorney
Bill Atkinson, Attorney

On Behalf of AT&T of the Southern States, Inc. :

Roxanne Douglas, Attorney

On Behalf of BellSouth Telecommunication, Inc. :

William J. Ellenberg, II, Attorney
Douglas Lackey, Attorney
Tom Alexander, Attorney

On Behalf of Cable Television Association of Georgia:

Laura Nix, Attorney

On Behalf of BellSouth Advertising and Publishing Company:

Michael S Bradley, Attorney

On Behalf of MCI Telecommunications Corporation:

David Adelman, Attorney
Marsha Ward, Attorney

On Behalf of Sprint Communications Company, L.P. :

Benjamin Fincher, Attorney
Carolyn Tatum Roddy, Attorney

On Behalf of MFS Intelenet of Georgia, Inc. :

James Falvey, Attorney

On Behalf of ACSI:

James Rice, Attorney

On Behalf of Southern Directory and Georgia Public Communications Association:

Dean R. Fuchs, Attorney

BY THE COMMISSION:

INTRODUCTION

The Georgia Public Service Commission ("Commission") is charged with implementing and administering Georgia's new Telecommunications and Competition Development Act of 1995, O.C.G.A. § 46-5-160 *et seq* (hereafter "the Georgia Act"). As a part of this responsibility, the Commission shall determine the reasonable rates, terms or conditions for the purchase or resale of local exchange service, and the Commission shall have the authority to require local exchange companies to provide additional interconnection services and unbundling

Under O.C.G A. § 46-5-164(e), any local exchange company or telecommunications company desiring to purchase or resell services purchased from another local exchange company may petition the Commission for the authorization to purchase or resell such services On December 21, 1995, AT&T Communications of the Southern States, Inc ("AT&T") filed a petition with the Commission requesting the establishment of rules, rates, terms and conditions for the resale of telecommunications services as provided by the Georgia Act AT&T also sought an initial unbundling of services pursuant to the Commission's express authority under O C.G A. § 46-5-164(g).

On February 6, 1996, the Commission adopted a Procedural and Scheduling Order in this docket which outlined the manner in which this proceeding would be conducted. Subsequent to AT&T filing its petition in this docket, on February 8, 1996, the Telecommunications Act of 1996 ("the Federal Act") became law Pub L. No. 104-104, 110 Stat. 56 (Feb. 8, 1996). The 1996 Federal Act makes sweeping changes in telecommunications, laying the groundwork for competition to grow nationally in the local exchange market The Federal Act requires incumbent Local Exchange Carriers (LECs) to "offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers." (Section 251(c)(4)(A)). The Federal Act further requires that a State Commission shall determine wholesale rates for those incumbent LEC services available for resale (Section 252(d)(3)).

The Consumers' Utility Counsel ("CUC"), BellSouth Telecommunications Inc ("BellSouth"), Cable Television Association of Georgia ("CTAG"), BellSouth Advertising and Publishing Company ("BAPCO"), MCI Telecommunications Corporation ("MCI"), Sprint Communications Company ("Sprint"), ATA Communications, Inc ("ATA"), MFS Intelenet of Georgia, Inc ("MFS"), American Communications Services of Columbus ("ACSI"), Competitive Telecommunications Association ("COMPTEL"), Southern Directory and Georgia Public Communications Association ("GPCA") filed intervention notices in this docket. Hearings were held March 4-5, 1996, and April 1-3, 1996 Post-hearing briefs were filed on April 16, 1996, by AT&T, CUC, BellSouth, MCI, COMPTEL, Sprint, MFS and BAPCO

FINDINGS OF FACT, CONCLUSIONS OF LAW AND DECISIONS OF REGULATORY POLICY

Based upon the entire record in this proceeding, including those matters incorporated by reference, the Commission hereby renders the following findings of facts, conclusions of law, and decisions of regulatory policy:

JURISDICTION

Jurisdiction is proper with the Commission and the Commission has authority to render a decision in this matter pursuant to O.C G.A. § 46-5-164(e) and § 46-5-164(g)

AT&T's petition specifically requests that the Commission (1) establish resale rules, (2) establish the rates, terms and conditions for resale as authorized by the Georgia Act, including the appropriate wholesale rates and the guidelines for operational interfaces, (3) require the initial unbundling of operator services, directory assistance and appropriate routing of repair calls, and (4) adopt the Total Wholesale Service tariff for providing wholesale services to resellers as proposed by AT&T.

The Company's petition rightfully notes that unlike interconnection services, the Georgia Act does not require negotiations to establish the rates, terms and conditions for resale of telecommnunications services prior to petitioning the Commission for these purposes AT&T and BellSouth have engaged in multiple negotiations sessions over a four month period concerning resale and other matters pertinent to local competition in Georgia AT&T has been unable to reach an agreement with BellSouth that will allow AT&T to enter the local exchange market The Commission finds that AT&T filed this petition seeking relief from the Commission after unsatisfactory lengthy negotiations with BellSouth

On March 12, 1996, the Commission issued a memorandum to all parties of record requesting that they submit to the Commission their assessment of the impact of the Federal Act on the Commission's ability to grant the relief sought by AT&T in the manner set forward in the Company's petition and supporting prefiled testimony Several parties responded to the Commission's request.

Section 251(c)(1) of the Federal Act provides that an incumbent LEC has the duty to negotiate in good faith on various local competition issues including resale of services and the unbundling of network elements. Under Section 251(c)(4) of the Federal Act, incumbent local exchange carriers must offer for resale any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers. Section 252(d)(3) of the Federal Act requires the Commission to arbitrate failed negotiations on resale and directs the Commission to determine wholesale rates for services to be resold. With regard to unbundling, an incumbent LEC has a duty under Section 251(c)(3) of the Federal Act to provide any requesting telecommunications carrier, nondiscriminatory access to network elements at any technically feasible point on an unbundled basis at rates, terms, and conditions that are just, reasonable, and nondiscriminatory.

O C G A. § 46-5-164(e) provides that in cases where the purchase or resale of services purchased is authorized by the Commission, the Commission shall determine the reasonable rates, terms, or conditions for the purchase or resale O.C.G A § 46-5-164(g) further provides that the Commission shall have the authority to require local exchange companies to provide additional interconnection services and unbundling.

The Federal Act states at Section 261(b) that "[n]othing in this part shall be construed to prohibit any State Commission from enforcing regulation prescribed prior to the date of the enactment of the Telecommunications Act of 1996, or from prescribing regulations after such date of enactment, in fulfilling the requirements of this part, if such regulations are not inconsistent with the provisions of this part." The Commission finds that no material conflicts exist between the two Acts with regard to resale and to unbundling Generally the Federal Act is more specific with regard to the requirements for resale and unbundling, while the Georgia Act leaves these matters for the Commission to decide.

SERVICES AVAILABLE FOR RESALE

Several parties presented testimony regarding what services should be made available for resale Specifically, AT&T requested that all existing retail services, including grandfathered service offerings and new services as they are available be offered for resale MCI presented testimony which stated that services available for resale should also include any discounted retail service, discount package, or promotional offering BellSouth advocated that grandfathered services, promotional offerings, and certain discount packages should not be made available for resale Other parties encouraged the Commission to adopt the standard contained in Section 251(c)(4)(A) of the Federal Act

The Commission finds that all existing retail services sold to non-telecommunications providers except those services which are presently grandfathered shall be made available for resale This includes any discounted retail service, discounted package, and new service offerings as they become available. Promotions are not included because they are not tariffed offerings. Grandfathered services shall not be available for resale. These services by definition are no longer available to any new subscription To allow grandfathered services to be resold would serve to undermine this basic definition The Commission finds that it shall continue to monitor the grandfathered provision and the offering of special promotions to insure that they are implemented in a way that is consistent with existing Commission policy.

RESTRICTIONS ON RESOLD SERVICES

AT&T advocated that the Commission impose limited restrictions on services resold All parties presented similar testimony requesting that the Commission adopt certain class of service restrictions and the interLATA joint marketing restriction contained in the Federal Act. Generally, parties agreed that it would be necessary for the Commission to impose a restriction on resale between classes of local service, such as resale of residential local exchange service to business customers Sprint noted in its prefiled testimony that. "[t]he price differential between business and residential customers would collapse unless resale between these classes is restricted or until local rates are rebalanced to eliminate the differential between business and residential customers." (Tr. at pp. 657-658).

Section 271(e)(1) of the Federal Act provides that until a Bell operating company is authorized to provide interLATA services in an in-region State, or until 36 months have passed since the date of enactment of the Telecommunications Act of 1996, whichever is earlier, a telecommunications carrier that serves greater than 5 percent of the nation's presubscribed access lines may not jointly market in such State telephone exchange service obtained from such company with interLATA services provided by that telecommunications carrier.

The Commission finds that it shall impose class of service restriction on the resale of all retail service offerings In addition the Commission finds that it shall adopt the interLATA joint marketing restriction contained in the Federal Act.

WHOLESALE SERVICES TARIFF

AT&T witness Guedel included as an attachment to his prefiled testimony an "illustrative" Total Wholesale Services Tariff for providing wholesale services to resellers as proposed by the Company. The proposed tariff included limited terms and conditions for the wholesale provisioning of resold services. AT&T requested that the Commission adopt specific provisions which included a 90 day advance notice on new offerings and 30 day advance notice on promotions Several parties presented testimony requesting that a separate wholesale tariff be established

The Commission finds that AT&T's "illustrative" Total Wholesale Tariff is simply that, "illustrative" and therefore incomplete, inadequate and shall not be adopted. The Commission further finds that AT&T's request to establish a 90 day advance notice on new service offerings has not been adequately supported. BellSouth shall be required to file a separate complete Wholesale Tariff containing the rates, terms and conditions for all services provided This initial filing as well as proposed revisions shall be subject to Commission approval. All proposed revisions to this tariff shall comply with the existing 30 day filing requirement BellSouth shall continue to comply with the existing provision in its General Subscriber Service Tariff which requires a 30 day notice to the Commission on all promotional offerings.

AVOIDED COST METHODOLOGY

The Federal Act provides that State Commissions shall set wholesale prices for telecommunications services on the basis of retail rates charged to subscribers for the telecommunications services requested, excluding the portion thereof attributable to any costs that will be avoided by the local exchange carrier (Section 252(d)(3)).

All parties generally agreed that the Federal Act standard is the appropriate basis for the Commission to determine wholesale rates, however several parties did provide their own unique interpretation of what that standard means. Sprint witness Key advocated that the Commission determine "net" avoided cost utilizing Total Service Long Run Incremental Cost (TSLRIC). Several parties recommended the Commission determine avoided cost using readily available embedded cost information. MFS and CUC also recommended the Commission adopt a "net" avoided cost approach Under this approach, determination of avoided cost would include any added costs of providing a service at wholesale BellSouth witness Maddox presented testimony that "[i]n our study, we looked at the costs that BellSouth would avoid making services available for resale We did not take into account the increased costs that would occur for offering the services on a resale basis " (Tr. at pp 523-524) MCI witness Dr Ankum's prefiled testimony indicated that any "net" avoided cost should be recovered in the service mark-up (Tr. at pp 842).

ATA witness Schwartz recommended that the Commission establish a lower wholesale rate for an extended term agreement than for a short-term arrangement ATA advocates that "[t]he wholesale rate in an extended resale agreement must reflect the downward pressure on retail price and the upward pressure on marketing and sales costs that will result from increased competition in the local exchange market." (Tr. at pp 708). MFS and Sprint also recommended wholesale rates be established service by service. Testimony presented by BellSouth and Sprint encouraged the Commission to establish separate discounts for residential and business wholesale services to reflect the current differentials which exist between similar retail offerings.

The Commission finds that the Federal Act standard is the appropriate method to determine avoided cost. The Commission rejects the argument of "net" avoided cost forwarded by several parties. Evidence presented in this docket indicates that TSLRIC studies for the items in question have not been conducted and to do so would require several months. The Commission shall initially use embedded cost information to determine avoided cost as specified in the Federal Act. The Commission further finds that a separate discount shall be determined for each customer class and the discount shall apply equally to all services in BellSouth's wholesale tariff The Commission finds that negotiated agreements may reflect additional discounts for longer terms

WHOLESALE DISCOUNT RATE

AT&T and BellSouth were the only parties who presented an avoided cost study in this docket AT&T's study yielded an overall wholesale discount rate of 28 3% BellSouth's study resulted in a 11% discount for residential wholesale offerings and a 9.5% discount for business services. MCI, ATA, and COMPTEL did not conduct their own study, but generally supported AT&T' s avoided cost study results CUC recommended that the Commission establish a floor level discount reflective of the BellSouth cost study results, and maintain a ceiling discount of 20% as ordered by the Illinois Commerce Commission MFS did not conduct its own study, but cautioned the Commission that deep discounts discourage the beneficial development of facilities-based competition MFS further stated that BellSouth's estimate of avoided cost are more consistent with the underlying principles of the Federal Act.

A review of AT&T's avoided cost study finds the Company utilizes embedded expense and revenue data which BellSouth reported to the Federal Communications Commission (FCC) in the 1994 Automated Report Management Information System (ARMIS), specifically Reports 43.03 and 43.04. AT&T's cost model removes all or some portion of direct and indirect costs which AT&T believes are avoided when selling services wholesale. The AT&T study shows direct costs avoided as follows. 100% of the cost for uncollectibles, 100% of the expenses associated with marketing, sales, and advertising and billing, and 20% of the Operator-Testing and Operator-Plant Administration expenses. AT&T's study also shows avoided cost to include 100% of operator related costs, such as call completion and number services functions AT&T maintains that these functions will be performed by the Company's own operators

There are also indirect costs which AT&T's Cost Model shows as avoided These include 21 73% of various General and Administrative expenses--including corporate expenses, finance, regulatory, legal, taxes, depreciation, general support, network support, research and development, and other general and administrative expenses. AT&T's Cost Model yields a 28.3% wholesale discount

BellSouth's Avoided Cost Model used that company's actual 1995 year-end financial data for the state of Georgia as reflected in the FR-1 report and the MR-5 BellSouth's study reflects avoided cost in the categories of uncollectibles, marketing, sales, and customer service BellSouth's Cost Model does not reflect any avoided cost in advertising, product management, call completion services, number services, or indirect cost BellSouth's study contains avoided cost of $12,396,537 for uncollectibles, $39,906,057 for marketing and sales, and $84,823,776 for customer services The total avoided costs included in BellSouth's study are $137,126,370 This computed level of avoided cost represents only 6.7% of the total expenses ($1,995,838,130) incurred by BellSouth for its Georgia operations during 1995 In other words, the Company has deemed 93.3% ($1,861,747,721) of its total expenses as unavoidable BellSouth maintains that the appropriate wholesale discounts are 11% for residential and 9 5% for business

Herein lies the fundamental difference between the parties regarding the cost that should be reflected in the determination of BellSouth's wholesale discount. BellSouth, MFS, and other supporting parties argue that the discount should reflect the costs that are actually avoided when provisioning wholesale local services. AT&T, MCI, ATA and COMPTEL advocate that all costs that are avoidable, whether or not they are actually avoided, should be reflected in the determination of the wholesale discount

The Federal Act states that a resale discount should reflect the

> "[r]etail rates charged to subscribers for the telecommunications service requested, excluding the portion thereof attributable to any marketing, billing, collection, and any other costs that will be avoided by the local exchange carrier " (Section 252(d)(3)).

BellSouth has interpreted the relevant portion of the Federal Act relating to the determination of a wholesale discount in a very strict manner BellSouth maintains that many functions now performed for the provisioning of retail services will not be avoided in a resale environment The Company believes that significant advertising, sales, and other related expenses will not be avoided in a wholesale situation BellSouth's position reflects a narrow, constrained view of an avoided cost approach.

AT&T and its supporting parties have taken a broader interpretation of the language in the Federal Act, arguing that avoidable cost is the standard mandated by the recently passed Federal legislation Under this approach avoidable cost include not only direct cost, but also indirect cost and resulting overheads associated with an avoided job function AT&T's position supports the inclusion of expenses such as depreciation, administrative expense and corporate overhead to the extent that they are avoidable

While neither approach is inherently precise, the Commission finds that in this instance a forward-looking avoidable cost approach yields more relevant and reliable results than a historical based avoided cost approach. This view holds particularly true in light of the sweeping changes taking place in the telecommunications industry ATA witness Schwartz noted. "[i]s it not true that BellSouth has been downsizing and that the very downsizing they're doing should and is being created by competition and resale, and that this cost should be reflected in deriving that avoided cost? I think it's an important issue and I think it's one that should be taken into consideration as part of the wholesale rate." (Tr at pp 699). BellSouth's strict avoided cost approach would potentially inhibit or otherwise severely limit the development of a competitive local exchange market. The Commission's endorsement of such an approach would provide BellSouth with little incentive to reduce or shed costs which are actually avoidable These potentially avoidable costs would continue to be subsidized by the Company's competitors, thereby virtually eliminating any form of meaningful competition

AT&T's response to CUC's Hearing Request (hereinafter referred to as "AT&T Hearing Resonse"), filed April 1, 1996, reflects the status of the Rochester Telephone Company (RTC) trial where AT&T has ceased marketing its competing local services On October 3, 1995, AT&T filed a complaint with the New York Commission seeking relief for reasons of price and service provisioning The Complaint states: "[t]he RTC 5% wholesale discount on local service is precisely such a commercially unreasonable discount It is noteworthy that the discount is so patently inadequate that only AT&T has even attempted to offer services on a resale basis pursuant to its terms " (Petition of Rochester Telephone Corporation for Approval of Restructing Plan Case 93-C-0103 N Y.P S C , Petition of Rochester Telephone Corporation for Approval of a New Multi Year Rate Stability Agreement Case 93-C-0033 N.Y P.S C., AT&T Communications of New York, Inc Complaint, Petition For Declaratory Judgement and for Reconsideration of Opinion No 94-25 N.Y.P.S.C., page 5).

The Commission finds that BellSouth's Avoided Cost Model represents a sound mathematical approach toward computing a wholesale discount. The data utilized to compile the study represents the most recent year-end information available for BellSouth's Georgia operations. The Commission finds that BellSouth does not properly account for certain expenses that are reasonably avoidable. The Commission finds that the data contained in the AT&T Cost Model is dated information and to some degree jurisdictionally mixed The Commission finds that the AT&T study overstates certain avoidable costs. The Commission finds that it is both necessary and prudent to revise the avoided cost contained in BellSouth's study to determine an appropriate wholesale discount

Appendix 1 reflects the calculations supporting the wholesale discount adopted by the Commission and a narrative explaining the adjustments made to BellSouth's Avoided Cost Model. Based on the results of the computation, the Commission finds that the appropriate wholesale discount is 20 3% for residential services and 17 3% for business services The Commission finds that these discounts shall apply to all recurring, non-recurring and intrastate toll retail offerings The Commission finds that the currently tariffed non-recurring charges for primary and secondary services with the appropriate discount will apply to resellers (See BellSouth's Response to Staff Hearing Request No. 3 to Lorraine Maddox, page 1 of 1) The Commission finds that these levels shall remain in effect for a 12 month period At the end of this 12 month period, the Commission shall conduct a review to determine if the need exists to modify these initial discount levels.

OPERATIONAL INTERFACES

AT&T has specifically requested that the Commission require BellSouth to establish electronic operational interfaces for pre-service ordering, service ordering and provisioning, directory listing and line information databases, service trouble reporting and customer daily usage data The Company has also requested that the Commission apply an additional 10% discount for BellSouth's failure to comply with the establishment of electronic interfaces. AT&T is supported in its request by MCI, ATA, and Sprint AT&T's Hearing Response reflects service provisioning concerns raised by the Company in its October 3, 1995 complaint filed against RTC with the New York Commission "AT&T is severely disadvantaged due to the fact that RTC has failed to provide procedures for resellers to access the RTC databases for on-line queries needed to perform basic service functions as scheduling customer appointments." (Petition of Rochester Telephone Corporation for Approval of Restructing Plan Case 93-C-0103 N.Y P S.C , Petition of Rochester Telephone Corporation for Approval of a New Multi Year Rate Stability Agreement Case 93-C-0033 N.Y P.S C., AT&T Communications of New York, Inc Complaint, Petition For Declaratory Judgement and for Reconsideration of Opinion No 94-25 N.Y P.S C , page 12). ATA witness Schwartz testified "[m]y concern is how do we now proceed to interface into their system, how do we provision those customers now with them. If we can't do it electronically, it's just going to be a disaster." (Tr at pp. 721).

BellSouth witness Scheye acknowledges that. "[n]o one is happy, believe me, with a system that is not fully electronic." (Tr at pp 430). Further testimony by Scheye indicates that "[i]n the initial stages we plan to use fax machines ... " (Tr. at pp 429) MFS and BellSouth recommended that the Commission delay the establishment of electronic interfaces until after national standards are set

The Commission finds that AT&T's request is timely and appropriate in that it is imperative that a reseller have access to the same service ordering provisions, service trouble reporting and informational databases for their customers as does BellSouth The Commission finds that BellSouth shall establish the requested operational interfaces by July 15, 1996. AT&T's request for an additional 10% discount is denied The Commission finds that access to these interfaces shall be made available to any requesting party at the same terms and conditions.

DIRECTORIES

AT&T has also requested that the Commission establish certain provisions regarding the maintenance of telephone directories The Company has specifically requested that (1) BellSouth be required to include basic white page listings for resellers' residential and business customers as well as yellow page listings for business customers, (2) additional or enhanced listings be made available to the reseller at the same rates, terms and conditions as available to BellSouth customers, (3) BellSouth make directory listing data available for purchase so that the reseller can package and brand its own white and yellow page directories and, (4) resellers be afforded the opportunity to place local customer service information in BellSouth's directories

BellSouth witness Scheye presented testimony that indicates that for all directory matters other than insertion of regular listings in the white pages, arrangement will be made with BellSouth's directory affiliate, BAPCO The brief filed by BAPCO on April 16, 1996, reflects a similar position BAPCO appropriately notes: "[t]his Commission historically has not asserted jurisdiction over publishing of Yellow Pages " (BAPCO brief). BAPCO has indicated an express willingness to provide the additional directory arrangements requested by AT&T. MFS, Sprint, MCI, ATA, COMPTEL and CUC did not take a position on this issue

The Commission finds that BellSouth shall include white page listings for all new resellers' customers in its directory. All other directory arrangements requested by AT&T should be pursued with BellSouth's service agent BAPCO

UNBUNDLED OPERATOR SERVICES

AT&T has requested the ability to purchase from BellSouth "branded" operator services (including directory assistance, 0+, 0- toll dialing, busy line verification and interrupt). Alternatively the Company has requested that BellSouth be ordered to provide selective routing arrangements that will enable an AT&T customer to reach an AT&T operator platform just as a BellSouth customer can reach a BellSouth operator today. MFS and Sprint support AT&T's request Sprint further recommended that custom branding for resellers is a service resellers should pay for, and some branding requests may not be technically feasible

BellSouth witness Scheye testified that the Company stands ready to unbundle any network elements required by telecommunications carriers where technically feasible BellSouth advocates that embedded cost should be utilized in determining the cost of an unbundled network element MCI, CUC, COMPTEL, and ATA did not take a position on this issue

The Commission finds that AT&T's request is valid and reasonable. The Commission finds that the ability of a competing carrier to utilize their own operators or custom "branded" operator services will enhance the ability of that entity to effectively compete However, sufficient evidence was not presented by the parties regarding technical limitations, implementation cost and cost recovery. Accordingly, until the parties are able to present credible evidence on these issues, the Commission cannot grant AT&T's request.

The Commission directs that AT&T and BellSouth submit a joint report to the Commission which addresses a resolution of these outstanding issues If the parties do not reach an agreement on these issues, each party should reflect their positions and factual evidence which supports same in the body of the report Absent a resolution, this report shall be used as a primary basis for a Commission decision regarding this matter.

WHEREFORE, IT IS:

ORDERED that all existing retail services sold to non-telecommunications providers except those services which are presently grandfathered shall be made available for resale. This includes any discounted retail service, discounted package, and new service offerings as they become available Promotions are not included because they are not tariffed offerings. The Commission shall continue to monitor the grandfathered provision and the offering of special promotions to insure that they are implemented in a way that is consistent with existing Commission policy.

ORDERED FURTHER, that the Commission shall impose class of service restriction on the resale of all retail service offerings In addition, the Commission shall adopt the interLATA joint marketing restriction contained in the Federal Act

ORDERED FURTHER, that within 30 days of the issuance of this Order BellSouth shall be required to file a separate complete Wholesale Tariff containing the rates, terms and conditions for all services provided. This initial filing as well as proposed revisions shall be subject to Commission approval All proposed revisions to this tariff shall comply with the existing 30 day filing requirement BellSouth shall continue to comply with the existing provision in its General Subscriber Service Tariff which requires a 30 day notice to the Commission on all promotional offerings.

ORDERED FURTHER, that the Federal Act standard of retail rates excluding avoided cost is the appropriate bases to determine wholesale rates. The Commission shall initially use embedded cost information to determine avoided costs as specified in the Federal Act. A separate discount shall be determined for each customer class and the discount shall apply equally to all services contained in BellSouth's wholesale tariff Negotiated agreements may reflect additional discounts for longer terms

ORDERED FURTHER, that the appropriate wholesale discount is 20.3% for residential services and 17.3% for business services. These discounts shall apply to all recurring, non-recurring and intrastate toll retail offerings. The currently tariffed non-recurring charges for primary and secondary services with the appropriate discount shall apply to resellers. These discount levels shall remain in effect for a 12 month period effective June 15, 1996 At the end of this 12 month period, the Commission shall conduct a review to determine if the need exists to modify these initial discount levels

ORDERED FURTHER, that BellSouth shall establish electronic operational interfaces for pre-service ordering, service ordering and provisioning, directory listing and line information databases, service trouble reporting and daily usage data by July 15, 1996. AT&T's request for an additional 10% discount is denied Access to these interfaces shall also be made available to any requesting party at the same terms and conditions. These interfaces shall provide access to resellers for their customers which is equivalent to that of the incumbent LEC. BellSouth and AT&T shall submit a joint report to the Commission within 30 days after this Order is issued which will update the activities and implementation time frames necessary to deploy these interfaces

ORDERED FURTHER, that BellSouth shall include white page listings for all new resellers' customers in its directory. All other directory arrangements requested by AT&T should be pursued with BellSouth's service agent BAPCO.

ORDERED FURTHER, that AT&T and BellSouth are directed to submit a joint report to the Commission within 30 days of the issuance of an Order in this docket which addresses a resolution of outstanding issues relative to AT&T's provision of its own operator services If the parties do not reach an agreement on these issues, each party should reflect their position and factual evidence which supports same in the body of the report Absent a resolution, this report shall be used as a primary basis for a Commission decision regarding this matter.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper

The above action by the Commission in Special Administrative Session on the 29th day of May, 1996

Terri M Lyndall
Executive Secretary

June 12, 1996
Date

Dave Baker
Chairman

June 12, 1996
Date

CALCULATIONS SUPPORTING WHOLESALE DISCOUNT LEVEL

Appendix 1

The wholesale discount level was calculated utilizing the Avoided Cost Discount Model proposed by BellSouth witness Frank R Kolb The basis equation contained in Mr Kolb's model is reflected below

$$\%\text{DISCOUNT} = \frac{\text{COST AVOIDED AS A RESULT OF RESALE}}{\text{REVENUE FROM RESOLD SERVICES}} \times 100$$

The Commission has made adjustments to the avoided cost calculated by Mr Kolb to reflect additional avoided cost for sales, advertising, call completion services, number services and an assignment of indirect cost associated with the direct cost allocation contained in BellSouth's calculations. The numerical information utilized to make these adjustments was derived from Staff data requests submitted in the context of the public hearing regarding this matter.

The first adjustment the Commission made to BellSouth's avoided cost calculation is to recognize additional avoided cost associated with Sales The Company's study included $39,906,057 as avoided cost for Sales This represents 61% of the total sales expense incurred by BellSouth's Georgia Operations for 1995. The Commission has included in its calculation avoided cost for Sales of $48,675,614 This represents 75% of the total sales expense incurred by the Company After reviewing BellSouth's Account Records Categories for Sales (Account 6612) the Commission finds that many of the representative work functions contained therein will be avoided in a resale environment The Commission finds that the recommended avoided cost associated with Sales contained in this calculation is conservative at best.

The Commission finds that it is reasonable to assume that there is a direct correlation between Sales and Product Advertising. BellSouth did not include any product advertising cost as avoidable in their study The Company incurred product advertising expense of $17,566,591 for year-end 1995 The Commission finds that in order to remain consistent in its approach, it is appropriate and reasonable to conclude that 75% of the total product advertising cost will be avoided This yields avoided Product Advertising cost of $13,174,943. Likewise, a review of the Company's Account Records Categories for Product Advertising (Account 6613) reveals that many of these work functions will be avoided in the wholesale provisioning of services.

Several parties in this docket indicated their intention to utilize their existing operators to provide local operator and call completion services (i e., 0+, 0-, Directory assistance). BellSouth's study did not include any avoided cost related to Call Completion and Number Services which are expense categories directly related to the provision of operator services The Commission has included $3,031,565 in its calculation as avoided cost associated with Call Completion. This represent 25% of the total Call Completion expense incurred by the Company for 1995 Similarly, the Commission has included $8,281,083 in its calculation as avoided cost related to Number Services. This represents 25% of the total Number Service Expense incurred by BellSouth The Commission finds that a 25% allocator represents a reasonable initial assignment of cost that will be avoided Potentially, avoided cost in these areas may grow as competitors' call completion traffic increases.

The final adjustment the Commission made to the BellSouth cost study relates to the assignment of indirect cost which will be avoided The avoided cost identified in the Company's calculations are all related to directly assignable cost BellSouth did not reflect any indirect cost such as General Support, Administrative, or Corporate Operations in its study The total avoided cost included in the Company's study is $137,126,370 The total direct avoidable expense included in the Commission's calculations is $170,383,518. The Commission finds that in keeping with its forward-looking approach, it is reasonable to reflect a level of indirect avoidable cost associated with the direct avoidable cost previously identified and calculated

A review of previous cost studies submitted by BellSouth to the Commission reflect a range for indirect cost as a percentage of direct cost to be 30% to 50%. The Commission finds that it is reasonable to calculate the indirect avoided cost using a 50% factor This yields an additional avoidable expense of $85,191,759 This level represents less than 5% of the total expense($1,861,747,721) BellSouth deemed unavoidable The Commission finds that as with all the previous adjustments made to BellSouth's study, this estimate of indirect avoidable cost is extremely conservative The total avoidable cost (direct and indirect) calculated by the Commission is $255,575,277

The Commission utilized the same total revenues from resold services as contained in the BellSouth study The study contains residential revenues in the amount of $653,955,846 and business revenues of $709,781,717. The total revenues contained in the study are $1,363,737,563. The Company's study reflect that 52% of its total calculated avoided cost is attributable to residential services and 48% to business services The Commission utilized these same percentages in calculating its separate residential and business wholesale discounts

The Commission's Approved Discount Levels Are Calculated Below:

$$\text{RESIDENTIAL DISCOUNT} = \frac{\$132,899,144}{\$653,955,846} \times 100 = 20.3\%$$

$$\text{BUSINESS DISCOUNT} = \frac{\$122,676,133}{\$709,781,717} \times 100 = 17.3\%$$

Tab C-6

BellSouth's Preliminary Report
to the
Georgia Public Service Commission

Operational Interfaces Between BellSouth and Resellers

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JMB-35
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June 21, 1996

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(ILLUSTRATED)

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FIGURE 7: OPERATIONS PLANNING TIMELINE AND COST ESTIMATES
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required for the completely mechanized process. Development will require approximately ten months, and will cost approximately $6 million to $7 million. BellSouth currently is moving forward with the design phase for this interface. However, with the fact that pre-ordering information is not necessary for the bulk of reseller orders, in addition to the fact that a workable alternative is currently in place, BellSouth should not be required to incur cost of that magnitude unless appropriate arrangements have been made for cost recovery.

In addition, given the complexities of this implementation, a July 15, 1996 implementation date is not possible. For example, the detailed design phase alone, which began in May, 1996, is expected to take approximately four months to complete, with an associated design development cost of approximately $500K. The subsequent implementation will require at lease six additional months, with an additional implementation cost estimated to be $5 million to $6 million. Actual implementation costs and timing will be determined during the design phase. The complexities include ordering and installing hardware for the communication links, development of presentation software to display the information obtained from the databases, and modifying the databases themselves to provide the necessary data to the presentation system. In light of the magnitude of this effort, the rapidly changing technological environment, and to be certain it is providing the best and most cost-effective interface to meet resellers' eventual needs, BellSouth continues to explore alternative solutions that might allow a phased approach to this massive undertaking.

Trouble Reporting

In keeping with its need to accommodate resellers with varying mechanization capabilities, BellSouth is prepared to accept either verbal or electronic trouble reports from resellers. In addition to its plans for accepting resellers' verbal trouble reports in the same centers serving BellSouth's end users, BellSouth has offered resellers an electronic interface for trouble reporting through the same electronic gateway that is now used by IXCs for access

services. Through this interface –which is available today – a reseller may report a trouble, obtain the same appointment interval that would be given to a BellSouth end user customer, subsequently add information to the report itself, check for trouble completion, and cancel the trouble report if necessary. In response to troubles reported via the gateway, BellSouth will test and initiate repair to the resold line. This arrangement is comparable to the electronic trouble reporting available for access customers today, as shown in Figure 5 on the following page.

In response to troubles reported either verbally or via the mechanized interface, BellSouth will ensure that all appropriate tests are performed for resellers' customers, just as they are for BellSouth's customers. However, to make it possible for testing to proceed in precisely the same sequence for electronic trouble reports as for verbal trouble reports, BellSouth has investigated the possibility of adding to the existing gateway an interface to a system called Trouble Analysis Facilitation Interface (TAFI). That interface would allow the reseller to access the same interactive testing sequence that BellSouth follows to reduce manual handling of troubles. The TAFI interface could be made available in 1997, assuming that appropriate arrangements are made for the recovery of the approximately $3 million development and implementation cost.

Billing Detail

Resellers currently have the option of receiving their monthly bills in any of several formats. Available options include:

- Electronic Data Interchange (EDI) transmission
- Diskette Analyzer Bill Format
- Magnetic Tape
- CD-ROM
- Paper

Comparison of Access and Resale Processes for Electronic Trouble Reporting

☎ Electronic communication for resale trouble reporting is comparable to the electronic process for access trouble reporting. Reseller also has the option to report verbally, just as IXCs do. Either way, resellers' end users are given the same repair appointment interval as BellSouth's end users.

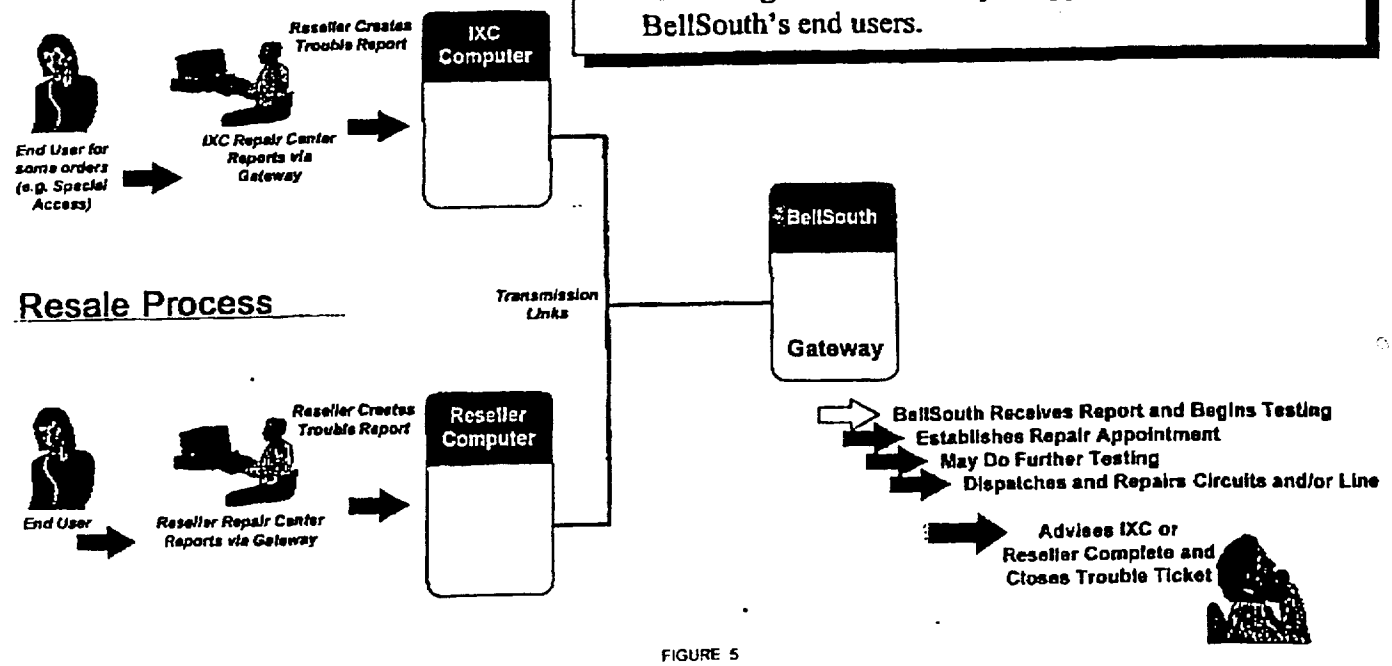


FIGURE 5

AT&T LAW DEPT. 2008

Tab C-7

cc: KB, BS, LS

MISSIONERS:
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Ga. Public Service Commission

DOCKET NO. 6352-U

ORDER

IN RE: **Petition of AT&T for the Commission to Establish Resale Rules, Rates, Terms and Conditions and the Initial Unbundling of Services**

Record Submitted: March 4, 1996
March 5, 1996
April 1, 1996
April 2, 1996
April 3, 1996

Decided May 29, 1996
July 2, 1996

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On Behalf of MFS Intelenet of Georgia, Inc.:

James Falvey, Attorney

On Behalf of ACSI:

James Rice, Attorney

On Behalf of Southern Directory and Georgia Public Communications Association:

Dean R. Fuchs, Attorney

BY THE COMMISSION:

On June 21, 1996, BellSouth Telecommunications, Inc. ("BellSouth") filed a Motion for Reconsideration and Clarification of the Commission's Order issued June 12, 1996, in Docket No. 6352-U. BellSouth filed its motion requesting the Commission reconsider and clarify a number of items in its Order, including the requirement imposed upon BellSouth to provide resellers of BellSouth's telecommunications services with a number of electronic interfaces by July 15, 1996. BellSouth also filed with its motion a preliminary report on the status of operational interfaces for resellers. BellSouth filed an update to its preliminary report on July 1, 1996.

BellSouth and AT&T Communications of the Southern States, Inc. ("AT&T") have held on-going negotiations regarding these interface issues in an attempt to reach an agreement on the matter. Both parties have submitted separate responses to the Commission indicating the two companies have not been able to reach an agreement. The purpose of this Order is only to rule on the portion of BellSouth's Motion for Reconsideration and Clarification dealing with electronic interfaces. The Commission is scheduled to rule on the remaining issues contained in the Motion for Reconsideration and Clarification at its next regularly scheduled Administrative Session.

FINDINGS OF FACT, CONCLUSIONS OF LAW AND DECISIONS OF REGULATORY POLICY

Based upon the entire record in this proceeding, including those matters incorporated by reference, the Commission hereby renders the following findings of facts, conclusions of law, and decisions of regulatory policy:

1.

BellSouth's Operational Interfaces Preliminary Report and Update submitted to the Commission on June 24, 1996, provides detailed documentation regarding the status of the development, cost and projected implementation dates for the various electronic interfaces requested by AT&T and other potential resellers. The Commission understands that the implementation of all systems and processes necessary for offering resold local exchange service is a complex undertaking for all parties involved. Based upon a careful review and analysis of BellSouth's reports, the Commission finds it necessary to amend the implementation time frame set forth in its June 12, 1996 Order.

WHEREFORE, IT IS:

ORDERED that AT&T and BellSouth are to establish by July 22, 1996 a joint Implementation Team to assure effective implementation of the electronic interfaces and compliance with the Commission's Order.

ORDERED FURTHER, that with respect to the Pre-ordering category of electronic *interfaces:*

1. BellSouth is to provide by September 15, 1996 as a part of the Phase 1 implementation, the LAN-to-LAN access to the Regional Street Address Guide.

2. BellSouth is to provide AT&T by August 15, 1996 as a part of the Phase 1 implementation, the ability to transfer files of reserved telephone numbers via diskette.

3. BellSouth is to provide AT&T by October 15, 1996 as part of the Phase 1 implementation, the ability to electronically transfer files of reserved telephone numbers.

4. BellSouth is to provide AT&T by August 15, 1996 the technical specifications and process for what BellSouth describes as Phase II interactive solution.

5. BellSouth is to provide AT&T as a part of the Phase II implementation, BellSouth's proposed Phase II solution by December 31, 1996 but no later than April 1, 1997

ORDERED FURTHER, that with respect to the Ordering category of electronic interfaces:

1. BellSouth is to provide AT&T its technical specification and processes for interactive direct order entry by August 15, 1996.

2. BellSouth is to make fully operational and available by December 15, 1996 the Electronic Data Interface capability for receipt and transmission of orders for services in BellSouth's General Subscriber Services and Private Line Tariffs.

3. BellSouth is to implement an interactive direct order entry capability to be fully available by March 31, 1997.

ORDERED FURTHER, that with respect to the Maintenance and Trouble Reporting category of electronic interfaces:

1. BellSouth is to provide to AT&T by August 15, 1996 the technical specifications and process for TAFI interface.

2. BellSouth is to complete the TAFI enhancements to allow full operation of the required access by March 31, 1997.

3. AT&T and BellSouth are to include the necessary activities for electronic interfaces in the Joint Implementation Team discussed above.

ORDERED FURTHER, that with respect to the Daily Usage Data category of electronic interfaces:

1. BellSouth is to complete the work necessary so that it can provide unrated messages to AT&T by September 1, 1996.

ORDERED FURTHER, that orders placed through the operational interfaces shall be processed by BellSouth based on the time that the order was received by BellSouth, and not when the order was initially processed.

ORDERED FURTHER, that all cost incurred by BellSouth to implement these operational interfaces shall be recovered from the industry. If there is disagreement between the parties regarding cost recovery issues, the Commission shall initiate a separate hearing to address the matter upon the filing of a petition by any affected party.

ORDERED FURTHER, that BellSouth shall submit a monthly surveillance report to the Commission updating the activities undertaken to implement the requested operational interfaces. The initial report shall be filed no later than August 15, 1996.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering and ruling on the remaining portion of BellSouth Motion for Reconsideration and Clarification and entering such further Order or Orders as this Commission may deem just and proper.

The above action by the Commission in Administrative Session on the 2nd day of July, 1996

Terri M. Lyndall
Executive Secretary

Dave Baker
Chairman

July 11, 1996.
Date

July 11, 1996
Date

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the matter of:	)	
	)	
AT&T Petition for the Commission to	)	
Establish Resale Rules, Rates and Terms	)	**Docket No. 6352-U**
and Conditions and the Initial Unbundling	)	
of Services	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Order in the above-referenced docket was filed with the Commission's Executive Secretary, and a copy of same was served upon all parties and persons listed below via hand-delivery where indicated by an asterisk, or by depositing same in the United States mail with sufficient postage thereon to insure delivery and addressed as follows:

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So certified this 11th day of July, 1996

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Nancy G Gibson
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State Bar No. 293019
Counsel for the Commission Staff

Tab C-8

DRAFT DRAFT DRAFT

August 9, 1996 Draft of

BellSouth's Report to the Georgia Public Service Commission

Electronic Interfaces for Local Service Resellers

Monthly Surveillance Report

Report as of August 9, 1996

DRAFT DRAFT DRAFT

TECHNOLOGY SPECIFICATION

BELLSOUTH RESELLER INTERACTIVE DIRECT TROUBLE REPORT ENTRY SYSTEM

ACCESS METHOD

BellSouth is building an interface system that allows the Reseller to perform interactive direct trouble report entry. This interface system has several advantages over accessing multiple BellSouth legacy systems individually. It eliminates the need for the Reseller to log into multiple systems in order to complete the interactive direct trouble report entry process. The Reseller is required to log on to BellSouth's system only once. The interactive direct trouble report system takes care of sending and retrieving data from the legacy systems. To complete a trouble report entry, several systems are typically accessed. The output from one system is often the input for the next. By building an interface in front of these systems, the Reseller is freed from manually taking the output of one system and then using it for input to the next. The interface takes care of this automatically, quickly and more accurately than an individual could accomplish without it. The systems BellSouth's repair technicians use employ a similar methodology.

This interface will utilize World Wide Web hypertext screens. This technology is now widely accepted within the industry and offers many advantages over other presentation formats It allows the Reseller to use various types of terminal equipment capable of running a web browser. This includes PCs, Macs, UNIX workstations, Mainframes, and some non-graphical terminals. BellSouth plans to deploy the interactive direct trouble report system on a BellSouth web server.

CONNECTIVITY

The Reseller has three choices for connecting to BellSouth's web server: LAN-to-LAN, dial-up, and the public Internet. The communication path used will not affect the screens seen by the Resellers. Regardless of the connection choice by the Reseller, the connectivity chosen will support access to the pre-order system, the interactive direct order entry system and the interactive direct trouble report entry system

If a LAN-to-LAN connection is implemented, the Reseller provisions a single circuit from his LAN to a BellSouth secure router. This router serves as a firewall and directs Reseller traffic directly to the BellSouth web server where the

interactive direct trouble report system is deployed. The Reseller is required to sign-on to the trouble report system for authentication. Data flowing between the Reseller's terminal and BellSouth's interactive direct trouble report system utilizes this dedicated connection, but functions like the public Internet's World Wide Web.

If dial-up connectivity is selected, the Reseller is required to purchase an electronic security card. The Reseller dials into a BellSouth modem pool and is authenticated using the security card. After authentication, the Reseller is connected to the interactive direct trouble report entry system's web server. At this point, the Reseller begins using his web browser software to interact with the system's hypertext screens. This methodology has been successfully deployed within BellSouth for both internal and external customers.

If public Internet connectivity is selected, the Reseller simply accesses the Web through any means desired. The Reseller is required to purchase an electronic security card. Once connected, the Reseller uses a web browser to access BellSouth's interactive direct trouble report entry system web server. The Reseller is required to log on using the security card for authentication. Once authenticated, the Reseller is presented with the interactive direct trouble report interface.

LAN-to-LAN response times will be similar to those experienced by BellSouth users on our intranet. The presentation from the Web Server will be the same regardless of access method, but actual response times during dial-up access may be restricted by modem speed limitations. Currently, BellSouth employs modems with 28.8 kilobits per second capability. The response times over the public Internet may be affected by the user's Internet service provider and other factors that affect the public Internet.

CUSTOMER REQUIREMENTS FOR ACCESS

The Reseller may use a variety of terminal and software packages. The terminal and software packages must provide LAN connectivity and WWW Browser support. If a dial-up connection is used, the package must provide for PPP (Point-to-point protocol) dial-up access. The browser must support encryption and secure cookies. (A secure cookie is a named piece of information that the browser will only offer to a server if the appropriate level of security has been set up between the browser and the server.) Acceptable browsers include, but are not limited to, Netscape's Navigator 2.02 and Microsoft's Internet Explorer 3.

For any access other than LAN-to-LAN, the Reseller must purchase one security card for each user.

PROCESS

The following actions may be taken after the user is connected interactive direct trouble report entry system and has been authenticated. Additional screens and steps will be added as needed during development of the system.

Trouble Entry:

- The user will choose the option to enter a new trouble.
- The user will enter the information into the trouble form.
- The user will submit the trouble report form.
- The system will provide validations, including validations against background systems.
- The system will check for currently reported troubles
- The system will check BellSouth's systems and take corrective actions where appropriate.
- The system will respond to the user with the status, including any currently known troubles, and if corrective actions were taken.
- If the user wishes to place a trouble report with BellSouth, the user may fill in the returned screen and select an option to place a trouble report.
- Otherwise, the user shall select an option to not continue with the trouble report.
- If the user selects the option to place a trouble report, the system will return a trouble report number to the user and place the report into BellSouth's trouble and maintenance systems.

Trouble Status:

- The user will choose the option to get a trouble status.
- The user will enter the trouble report number and submit the form.
- The system will check BellSouth's trouble and maintenance systems and return a status to the user.

Trouble Report Modification:

- The user will choose the option to modify an existing trouble report.
- The user will enter the current trouble report number into the form.
- The system will return limited information about the existing trouble.

- The user will populate the supplemental information.
- The user will submit the supplemental trouble report form.
- The system will provide validations, including validations against background systems.
- If the supplemental report is valid and the current trouble is in an appropriate state, status information will be returned and the trouble report will be modified in BellSouth's trouble and maintenance systems.
- If the supplemental report is not valid, or if the current report is not in an appropriate state, appropriate error messages will be returned identifying the field(s) in error. These may be corrected and the trouble report resubmitted

Timeline

The BellSouth Interactive direct trouble report entry team is currently being staffed. Milestones will be set jointly between BellSouth and AT&T. The interactive direct trouble report entry System will be completed by March 31, 1997 pursuant to Georgia Public Service Commission document # 6352-U.

Tab C-9

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF GLORIA CALHOUN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 960833-TP

AUGUST 12, 1996

Q. Please state your name, address and position with BellSouth Telecommunications, Inc. ("BellSouth").

A. My name is Gloria Calhoun My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth Telecommunications, Inc. as a Manager in the Strategic Management Unit. In that position I handle responsibilities associated with operations planning for local competition

Q. Please summarize your background and experience.

A. I graduated *summa cum laude* with a Bachelor of Arts degree in Economics from the University of North Florida. In 1995, I completed a management program at the Georgia Tech Management Institute. I began my BellSouth career in 1981 when I joined the Southern Bell Business Marketing organization in Jacksonville, Florida. In that capacity I was responsible for coordinating the interdepartmental efforts needed to implement complex voice systems and associated exchange

real-time, interactive access to pre-ordering information. Meanwhile, this information is not even necessary to enable AT&T to compete for existing customers who simply choose to switch local service providers.

Electronic Interfaces for Maintenance and Repair

Q. AT&T claims in its petition that BellSouth has been unwilling to make a real-time, interactive electronic interface available for trouble reporting. Is this true?

A. No, it is not true. BellSouth has a fully electronic, real-time, interactive trouble reporting interface currently available for use by ALECs. In addition, at AT&T's request BellSouth has under development an enhancement that will provide ALECs with access to the same interactive testing capabilities BellSouth uses to screen POTS trouble reports. Finally, in keeping with its need to accommodate ALECs with varying mechanization capabilities, BellSouth also is prepared to accept verbal trouble reports.

Q. Please describe the currently available real-time, interactive, electronic interface for trouble reporting.

A. BellSouth has offered ALECs the same electronic interface for trouble reporting that is now available to IXCs for access services. This

interface allows the ALEC to enter a trouble report, obtain the same appointment interval that would be given to a BellSouth end user customer, subsequently add information to the report itself, check for trouble completion, cancel the trouble report if necessary and perform other trouble administration functions. In response to troubles reported via the gateway, BellSouth will test and initiate repair to the service.

The similarities between this arrangement and the electronic trouble reporting available for access customers are shown in the figure filed with this testimony as Attachment GC-5. This interface was implemented by BellSouth in 1995 for access services, at AT&T's request. This interface is based on national standards published by the American National Standards Institute (ANSI) and was implemented in accordance with industry guidelines. The ANSI standard defines the transfer of maintenance requests, status and closeout information between two telecommunications providers.

Q. Please describe the additional capabilities being added to the existing electronic trouble reporting interface.

A. At AT&T's request, BellSouth is adding the capability for the ALEC to access the same interactive testing sequence that BellSouth follows to screen trouble reports.

Q When will this enhancement be available?

A This enhancement is scheduled for completion in March of 1997.

Q Is this an aggressive schedule?

A. Yes, it is. This system was not originally built for external access. Therefore, extensive modifications are required in order to maintain the security and integrity of the system. BellSouth is not internally staffed for this development effort. Therefore, after defining the technical specifications for the interface, BellSouth must acquire external programming resources for an effort that will require thousands of programmer hours. In addition, the preliminary architecture will require BellSouth to purchase and install a new computer platform to establish connectivity with the external users of this system.

Q. What is the estimated cost of providing this enhancement?

A. Current estimates are that this interface will cost BellSouth approximately $3.5 million to develop and implement. Actual cost will be determined as the implementation proceeds.

Q. Please summarize your testimony on electronic interfaces for trouble reporting.

A AT&T's assertion that BellSouth is unwilling to provide a real-time, interactive, electronic trouble reporting interface is simply not true BellSouth has already provided such an interface In addition, at AT&T's request, BellSouth has a time-consuming and costly effort underway to provide additional interactive trouble reporting capabilities to ALECs.

Electronic Interfaces for Customer Usage Data Transfer

Q In its petition, AT&T claims that BellSouth has been unwilling to make an electronic interface available for customer usage data transfer Is this true?

A. No, it is not true. BellSouth already has the capability available to electronically provide customer usage detail to ALECs. This option provides detail for billable usage such as directory assistance or toll calls associated with a resold line or a ported telephone number. The usage option allows the ALEC to bill end users at their discretion, rather than on BellSouth's billing cycles. This option also allows an ALEC to establish toll limits, detect fraudulent calling, or analyze its customer usage patterns.

Q. How long has BellSouth had this electronic interface available?

Tab C-10

3 1 BACKGROUND

To better appreciate what TAFI does to enhance your ability to exceed your customer's expectations, let's take a minute to review the trouble resolution process before the introduction of this new system.

Customers reported their problems to the (old) Centralized Repair Service Attendants Bureau (CRSAB) at BellSouth where a Repair Service Attendant (RSA) input the customer's information into the LMOS system. The RSA then informed the customer that the problem would be resolved by the commitment date/time and that someone else would be contacting them.

The trouble report would then flow to the LMOS "auto-screener" (software package) to see if the system could determine where to send the report. This auto-screener had limited capabilities and could identify only obvious situations. (i.e., If the MLT test indicated that the line was open and the customer was reporting "No Dial Tone," the auto-screener package would route the report for a field technician to be dispatched.)

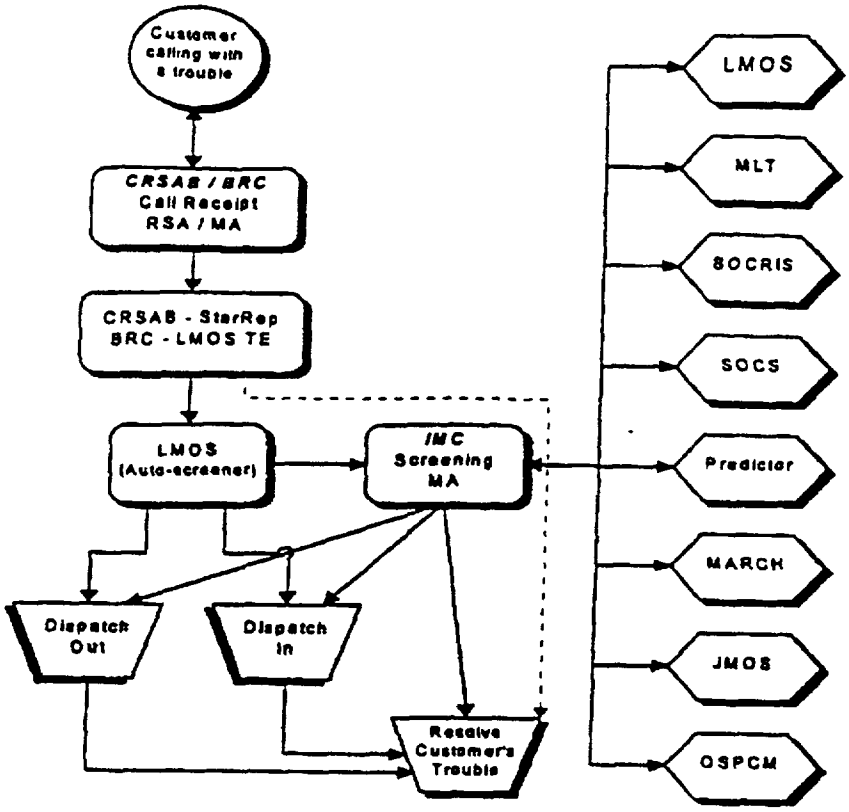
Reports that could not be handled by the auto-screener program were then routed to the "screener" position in the Installation Maintenance Center (IMC). The screener (a Maintenance Administrator - MA) accessed a number of downstream systems to manually analyze the situation and correct the problem (if it could be "remotely" repaired) or determined where the report needed to go for resolution.

This MA needed to (1) know which downstream system to use (i.e., there are 16 different Predictor systems in BellSouth), (2) possess the experience to analyze the information gathered and (3) provide consistent resolutions and/or recommendations as to where to send the problem.

With the introduction of a system called StarRep (1992), the RSA was provided the capability to perform some very basic trouble resolution functions. The TAFI system was built on these early initiatives to become the system used today in the RRC and BRC.

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Customer Contact - pre TAFI

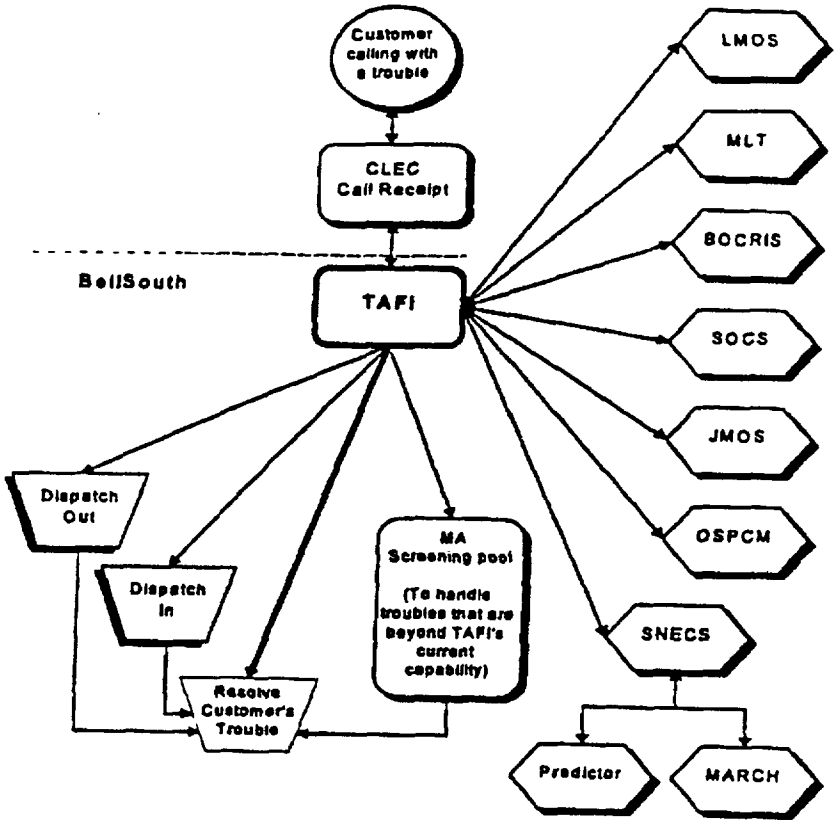


With the introduction of TAFI, the person handling the initial customer contact will resolve all POTS trouble conditions (for those troubles that can be cleared remotely) or route the trouble report to the correct entity for resolution. In other words, the functions performed by the MA in the IMC are now completed by the TAFI user on the initial contact.

This task was accomplished by developing a 'tool' that performs the mechanics of accurately processing the customers' trouble situations. TAFI actually accesses all of the downstream systems, gathers appropriate data, performs specific Central Office translation changes and provides the user with a recommendation / resolution to the problem condition.

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Customer Contact - with TAFI



32 A WORD ABOUT TAFI 'WINDOWS'

The user should be familiar with the characteristics of 'traditional' windows as seen in Microsoft Windows on a PC and on an X-Window LAN terminal. All of these windows include a title bar, the user can move them around the screen, the user can jump from one window to another, change their size, shrink them into icons, etc.

The term "window" has a different meaning in the TAFI application. TAFI was designed to be accessible from a number of different terminal types - everything from a sophisticated X-Window terminal to a simple ASCII terminal like a VT220. Therefore, the TAFI application does not support a Graphical User Interface (GUI). In other words, once you log into TAFI and use your mouse to move the TAFI screen to where you like it to be, you will not use the mouse to use TAFI.

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8.0 ADDITIONAL DATA WINDOW

TAFI gathers much information from a number of downstream systems during the processing of a trouble report. During the normal flow, TAFI uses this information to develop its recommendation. However, there may be times when you may want to view this information to gain a better insight to a specific problem. This information is found in the "Additional Data Window" and is accessible by depressing F11.

⇒ **Note:** The Additional Data Window is only available if you are processing a trouble report ... because without a telephone number to work on, TAFI doesn't gather any "data".

The Additional Data Window displays the following menu of options:

Test Results	displays the MLT results obtained by TAFI
Ticket Status	LMOS Recent Status Transaction (RST) - used to view the various lines of status on a pending trouble report
BOCRIS CSR	CRIS Customer Service Record - displays the products and services that are programmed on the line
LMOS TR	LMOS Trouble Report - a view of TAFI's interaction with the LMOS TR mask
Predictor	Predictor - the results of TAFI's inquire to Predictor
BOCRIS Pend Order	BOCRIS Pending Service Order - a view of what was ordered in BOCRIS
DATH Trouble History	LMOS Display Abbreviated Trouble History - A trouble history report showing just the close out narrative on previous trouble reports
DLETH Trouble History	LMOS Display Extended Trouble History - A trouble history report showing every line of status on previous trouble reports
DLR	LMOS Display Line Record - displays the customer's Line Record in LMOS
SOCS Pending Order	Service Order Communications System - displays the status of a pending service order
Other SOCS Orders	If the customer has more than one pending service order, this option lets you select which service order to view

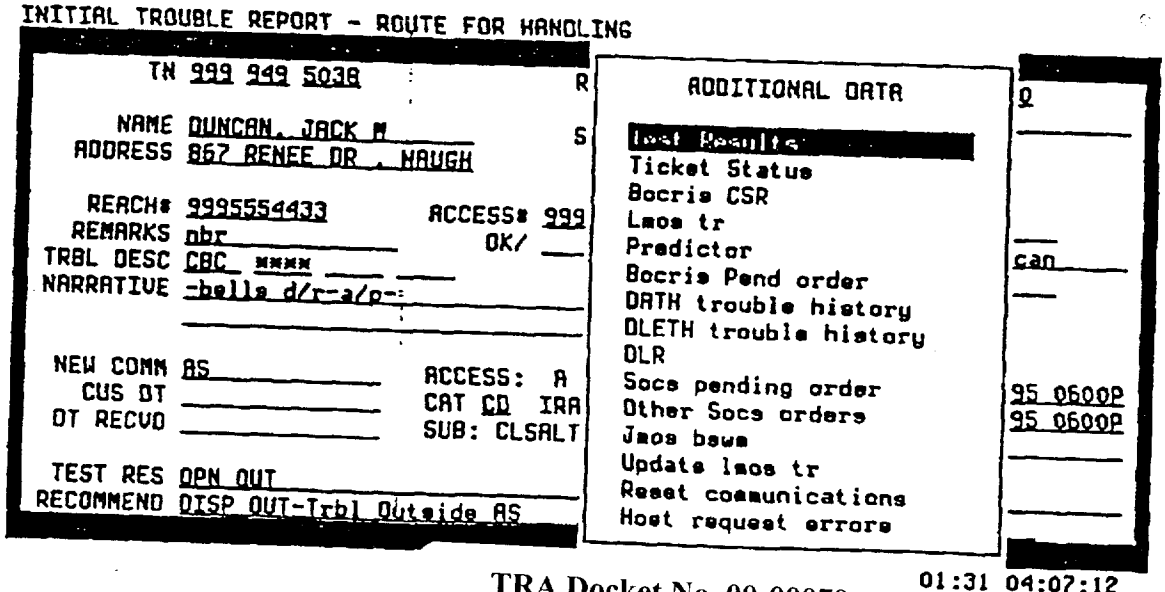
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JMB-35
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JMOS BSWM	JMOS Buried Service Wire - displays the status of work orders to bury customer's buried drop wires. (This work is performed by contractor.)
LMOS TR Update	If the trouble report is updating an existing LMOS report, you can view this update here
Reset Communications	If you get a "communications error" (i.e., Comm Error LMOS-A) you can actually reset the communications link between TAFI and the downstream system used by your session using this option
Host Request Errors	If TAFI attempted to gather some information or send some information and the request failed (due to either a communications problem or the host system was not available), you can re-send the transaction with this option

Most of these options produce reports that have more than one page. You may scroll through each page using the **Page Up** and **Page Down** keys.

With an active trouble report on your screen, depressing F11 produces the "Additional Data Window"

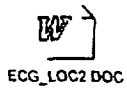


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Tab C-11

Bradbury,J M (Jay) - LGA

From. jshill@att com
Sent: Friday, December 18, 1998 4 21 PM
To: bradbury@att com
Subject: FW Notes EC Gateway - Local



MLT

From Eugene Piatkowski [SMTP Eugene Piatkowski@bridge bst bls com]
<mailto [SMTP Eugene Piatkowski@bridge bst bls com]>
Sent May 16, 1997 03 28 PM
To Hill, Jim
Cc Maria W Mayo, Linda W Tate
Subject Notes EC Gateway - Local

Jim,

Attached is a revised draft of the notes addressing issues raised in our February meeting We discussed these items last week and this document updates our replies
There is one or two open issues we are still working on and will provide you the answers early next week (i e , how many status entries on a typical report?)
Thanks,
Gene

---------- Attachment ----------

****

The following Microsoft Word For Windows V6 document is uuencoded You may use the UNIX uudecode utility to translate it to its native format

****

---------- Attachment ----------

<<ECG_LOC2 DOC>>

Notes From AT&T/BellSouth EC-Gateway Local Meetings —2/26/97, 2/27/97, 5/8/97 & 5/9/97

List below is an updated summary of items impacting the development of the EC Gateway for Local Competition discussed at the meetings between AT&T and BellSouth.

Key	For each **Attribute**:
	The first section represents AT&T's view/request
	The second section represents BST's interpretation / answer

Attributes

Activity Duration: AT&T will accept all values for Activity Type and would like to receive billing information in this attribute We need to look at this to see if this use would be consistent with the contract and to see if BellSouth can support this use

~~*Billing information is being investigated at BST.*~~ *The issue arises when the technician is performing a maintenance function and the customer is not covered by a maintenance contract This billing falls into a "manual process" and the amount of the charges will not show up on the LMOS trouble report when the ticket is closed However, a Disposition Code will tell alert AT&T that a bill was rendered The actual amount of the bill is processed by the LCSC and is not part of the LMOS record*

BST will provide a sample of how this billing statement will look

Additional Trouble Info List: LMOS currently supports a 50 character narrative BellSouth will look at this to see if they can support more Each time AT&T sends this attribute, it will be a replacement BellSouth will treat as additive We need to look at this

~~*This requires additional investigation by BST.*~~ *The narrative field length in BST's LMOSsystem is limited to 100 characters A number of required entries currently populate this field and care must be observed not to displace required data Therefore, will need to prioritize what info is populated in the narrative field (anticipate 50 characters available)*

Items currently populated in the narrative include (1) CLEC name (limit to 4 characters - ATT), (2) Access telephone number information (ACN=XXXYYYZZZZ) and (3) narrative information related to the trouble condition (Note, when the user sends the 'TR' transaction, (4) LMOS places the Trouble Description Code(s) as the 'first thing' in the narrative There could be up to four sets of four characters (minimum of two) i e , NDT OOSY BKDT If a report is backdated (BKDT), (5) the reason for the backdate is in the narrative as a code (i e , BK04) (Note BST is evaluating on standardizing the CLEC name going in the "Remarks" field to free up narrative room.)

As subsequent reports are taken and new information supplied, one must ensure that information needed to repair the trouble is not lost Typically, 'new' information is inserted first followed by the old information

Notes From AT&T/BellSouth EC-Gateway Local Meetings —2/26/97, 2/27/97, 5/8/97 & 5/9/97

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Solely for authorized persons having a need to know
pursuant to Company Instructions

Notes From AT&T/BellSouth EC-Gateway Local Meetings —2/26/97, 2/27/97, 5/8/97 & 5/9/97

Additional Trouble Status Info.: BellSouth does not currently support Estimated Repair Time and will look at this to see if they can support it BellSouth will include MLT results in this attribute on a create response They will determine if they can supply full results or just verification code and description

ETTR is the same as commitment time in BST. This time indicates that the trouble will be fixedNO-LATER-THAN the commitment time indicated (In the current EC Gateway, for LMOS, BST sends back commitment time as the ETTR) BST can provide the VER Code for the MLT test

At this time BST cannot provide additional information on the MLT test results and meet the October deployment schedule BST is investigating how to provide full MLT results (as an AVC) as an enhancement in early 1998

The commitment time on the LMOS record is the correct commitment to give the end user There are only two exceptions to this rule giving the customer a shorter commitment time (1) if the customer has a defined 'emergency' (i e , Dr on call) then the 3 clock hour emergency commitment is allowed and (2) if the customer restricts access to the property (for a report that requires a premises visit) prior to the established commitment time, the "B" time then becomes the commitment (Note BST will monitor % reports where initial commitments change and compare CLEC usage against BST usage Corrective actions will be taken to correct misuse of commitment settings)

Agent Contact Person: BellSouth will supply a center name and phone number (10 digit)

~~*BST will determine if 15 characters can be supported*~~*The Gateway can maintain a table of contact names and telephone numbers to return on each report (currently the WMC supervisor) Once BST deploys the LCAC (functionally similar to ACAC for local competition), the LCAC supervisor will function as the single point of contact*

A Location Access Address: BellSouth will check if this attribute is updatable AT&T would like capability to update via a Modify BellSouth stores 17 characters from Civic Address, City, and State BellSouth will use their own address BellSouth will check to see if they can compare their address against the address supplied by AT&T and inform AT&T if their is a significant mismatch

~~*BST Gateway can accept a create request when the aloc address does not match BellSouth's database. BST uses BST's address. This issue of sending back an AVC if the address does not match will have to be investigated by the BST work center. Today, AVC's containing updated Aloc Address information is not sent back to the CLEC or IXC.*~~*BST will provide LMOS address - if AT&T determines incorrect, they can send update If LMOS name or address data mismatches AT&T data, updated information goes in the narrative field as follows*

*LN-***Joe Smith**, *LA-***123 S. Main St.** *(i e , The customer name and address fields require a database update to correct errors (manual intervention) and is not directly updatable as AT&T's system is)*

Notes From AT&T/BellSouth EC-Gateway Local Meetings —2/26/97, 2/27/97, 5/8/97 & 5/9/97

A Location Access Hours: BellSouth stores only the current day in LMOS BellSouth will only dispatch 30 minutes before access is available according to this attribute AT&T will look at this

BST will populate current commitment If AT&T sends dates outside of offered commitment, and provides access hours, the report will be available for dispatch-out 30 minutes before the "A" (after) time on the commitment date Reports that do not require the dispatch of a field technician are not impacted by the access hour window and will be worked as they become available via the MSCR (mechanized screener function)

A Location Access Hours are populated in the "A" and "B" field on the LMOS TR screen These fields (A/B) should only be populated when a premises visit is required to fix a trouble and access to the network interface is restricted to specific times BST will store and appropriately react to these access hours ~~remmarks~~ - but can not store seven days worth

A Location Access Person: There is an issue as to the Person Name length BellSouth can support

~~Today, BST stores up to 7 characters.~~ This is constrained by the 100 char maximum in the narrative field in LMOS BST/AT&T Need to prioritize what is populated in the narrative field A location access person will be placed in the narrative as long as trouble information is not compromised (i e , 'see Joe').

Authorization List: Can BellSouth support "denied"? They will check Does AT&T need to supply authorization on a Create? Jim Hill will check the contract BellSouth will need to request "no access" time in order to subtract it from outage duration

Once a trouble ticket is submitted, the customer (AT&T) has agreed to BellSouth performing work necessary to repair trouble LMOS does not accept authorization prior to dispatch or taking line out of service to repair the trouble The gateway will support authorization denied attribute, and will not reject the transaction (causing the "set or create ticket" to fail)

Called Number: This is not a current field in LMOS BellSouth will store in the narrative

Correction The Called Number field is supported in BST's LMOS system

Cancel Requested By Manager: BellSouth will check to see how they would handle a Cancel with work in progress

~~BST is concerned of the work that is progress when a cancel is received.~~ A cCancel request will be accepted by the Gateway and sent ~~to into the narrative field in~~ LMOS as a subsequent report If IST value (status) of report is DPO (dispatched out), the report can not be closed If not DPO (i e , PDO - pending

dispatch out), then report can be closed appropriately ~~The CAS technician, if dispatched, may not receive the notification, therefore, the cancel is void.~~ BST would have~~will~~ incurred a cost for this repair attempt and may charge AT&T appropriately for the repair service.

Close Out Narrative: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Close out for LMOS tickets do not follow WFA Ticket will be closed without the verify process (originator does not verify fix before close of ticket) The close out narrative, as provided by the LMOS FST transaction, will be provided Note There will be an AVC indicating when the report was 'cleared' along with the associated narrative The 'close' status could come later and the "type", "cause" and "disposition" codes are only available on the close AVC

Commitment Time: BellSouth will send a "trouble resolved" time in Cleared Time We discussed jeopardy condition and possible escalation if BellSouth can not meet AT&T commitment time request

BST establishes commitment time This is the same as ETTR LMOS assigns commitment based upon internal algorithms and will set that time M&P's will identify how to handle "priority lines" (i e doctor, etc ~~etc~~) and emergency situations

Commitment Time Request: BellSouth Gateway accepts this attribute but does not send it to LMOS LMOS determines Commitment Time based on internal algorithm See Commitment Time for discussion of jeopardy

Customer Trouble Ticket Number: BellSouth will check to see if it can support 15 characters

Not needed for LMOS - for POTS, the telephone # is ticket #

Escalation List: AT&T needs BellSouth to identify how many levels of escalation it recognizes BellSouth stores escalation information in the narrative BellSouth will look at how it will support escalations

BST will provide M&P's in JIA to handle this manually (i e, Automatic escalation levels not supported within LMOS Until BST misses the commitment time, there is nothing to escalate Should the commitment be missed due to BST failure (i e, not No Accessed, pending facilities, etc) a subsequent report is generated with a new commitment value of 5 minutes from clock time This action puts this missed commitment report on the top of the work list for attention)

Maintenance of Service Charge: This is a billing issue Jim Hill will check if there is a fixed charge in the contract BellSouth will check how they could support this attribute

~~*Billing Issue needs to be investigated by BST for long term solution. Tech will show what was billed and not show T&M.*~~
Techs show that a bill was issued period (by disposition code) on the close out AVC Details of billing come from LCSC

Managed Object Access Hours: BellSouth needs to think about this attribute and determine if and how they can support it.

Request to repair marginal service after normal working hours (i e , don't swap cable pairs thereby taking the line out of service for some interval of time) is handled with a notation in the narrative

Managed Object Instance: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Attribute supported in the gateway

Manager Contact Person: BellSouth can support a Person Name of 20 characters and a Person Phone of 10 digits

The Person Name will be populated in the LMOS 'Remarks' field and the Person Phone will be populated in the 'Reach Number' field

Outage Duration: "No access" time will be subtracted from Outage Duration BellSouth will need to request "no access" time

BST will not request "No Access", it will report "No Access" Technician in field cannot communicate with the ECG interactively, status is via LMOS IST transaction

Outage duration is computed as the interval between receipt and clear time minus any no access time The no access period is computed as the time between when the report was statused no access and when it became available for action (i e , subsequent report statusing ticket PDO)

Perceived Trouble Severity: BellSouth will determine "out of service" and "service affecting" conditions from this attribute.

Based upon the current ECG, if the perceived trouble severity is a 0, it is labeled "out of service" This is part of BST/LMOS's algorithm for ETTR/commitment time calculation Conditions for this attribute (to determine commitment time) differ from state to state and depend upon work load, technician's location, date/time of notification of trouble

Out of Service (OS) is generally defined as the complete inability to make or receive calls (i e , NDT on all phones, CBC) If not OS, then report is marked as Affecting Service (AS) A definition of out of service based upon LMOS 'type' code and MLT VER codes will be provided in the JIA

Received Time: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Repeat Report: BellSouth supports "repeat" and "chronic" (3 or more trouble reports in 30 days) for POTS

A repeat report is defined as a second trouble reported within 30 days of closing a prior report BST LMOS system does not support (automatically flag) 'Chronic' reports

Restored Time: BellSouth will use "cleared" time from LMOS

Trouble Clearance Person: BellSouth can support a Person Name of 20 characters and a Person Phone of 10 digits

Maria: is this attribute something AT&T provides us (since I had a note saying 'same as manager contact person') or is it something AT&T is expecting from BST (who cleared the trouble)??

[The identifier of who cleared the trouble is found as the CUID (Common User ID) contained on close out - not name in close out narrative name (could be done electronic system ID) Clearance person telephone number not supported BST could provide the center contact person/telephone number]

Trouble Found: Need to map BellSouth LMOS codes to T1 227 values in JIA

Data provided in JIA

Trouble Report Format Object Pointer: AT&T will always use TRFD 1

Trouble Report ID: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document.

Trouble Report State: BellSouth will support the list of Trouble Report State/Trouble Report Status values supplied by AT&T.

BST will provide AT&T with list of IST values used on trouble reports in JIA

Trouble Report Status: BellSouth will support the list of Trouble Report State/Trouble Report Status values supplied by AT&T

Same as above

Trouble Report Status Time: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

IST transactions from LMOS contain both the Status time and IST values

Trouble Report Status Window: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Based upon no auto-escalation in LMOS, this is supported in the gateway and not used in LMOS. This window will be used to determine if a ticket has been closed in LMOS and needs closure in the GW

Trouble Type: Need to map BellSouth LMOS codes to T1 227 values in JIA BellSouth will reject unknown codes

Gateway will be updated for additional values

TSP Priority: BellSouth will use their own value BellSouth will look at what happens if the value supplied by AT&T does not match their value

The appropriate TSP values are loaded in LMOS for select lines Based upon TSP value, additional weightings (prioritization for repair activity) and provided in LMOS to ensure appropriate responses Differences in TSP values (for a given end-user) will have to be resolved manually Disaster # defined by application to Fed Government Handled same as BST

Functions

Enter Trouble Report (Create): LMOS may have a problem with tickets that were manually entered (fall back reporting) that is bonded later BellSouth will look at this issue

Manual tickets will remain manual through the life of the ticket BST does not support ticket recovery in LMOS - Tickets cannot be electronically bonded in the gateway if it was manually created Ticket would

have to be closed in LMOS and re-enter the ticket electronically to bond it However, this practice would negatively distort BST's performance statistics (i e , repeat report rate would go up)

Cancel Trouble Report: BellSouth needs to determine how they wish to handle a cancel after a dispatch

If the ticket is dispatched out, the ticket cannot be canceled~~cancelled~~ The cancel request will be sent to LMOS (as a subsequent report) and placed in the narrative field

BellSouth and AT&T agreed that BellSouth will support all other functions based on the function descriptions in the AT&T Requirements document.

Other Items

1 Every time a BellSouth person makes a narrative change in LMOS, BellSouth will send AT&T and AVC BellSouth and AT&T will look at this issue

Currently, there is no way to determine what AVC's to send to AT&T BST conducting a study to determine the average number of status entries per report and this issue may become moot

2 BellSouth will look at attributes for Local Number Portability and Location Routing Number

Need clarification on this issue Do not have this issue in notes Trent will review his notes and resubmit the question BST has developed strategies to address LNP opportunities and reports of this nature would be properly handled once in LMOS

3 Must Generalized Time always be in GMT (Zulu time) AT&T does not think so and is planning to use local time for several attributes AT&T (Trent Di Renna) will look into this issue

BST LMOS records in 'local' time where the report is located If required, EC Gateway will make the translations.

4 Can AT&T do a query after a Trouble Report is closed? Does AT&T want to do this? AT&T and BellSouth will check

BST Gateway supports GETS for closed tickets The EC Gateway maintains history data for seven days and this seems to satisfy AT&T's request

5 Will we use X 25?

BST can support X.25 or CMIP over TCP/IP over a private line.

AT&T / BellSouth
~~AT&T PROPRIETARY (RESTRICTED)~~
Solely for authorized persons having a need to know
pursuant to Company Instructions

6 What type of testing will we perform This will be determined

Begin Stack-Stack on 8/15, Gateway-Gateway on 8/22, End-End on 9/22, Operations Ready Test on 10/10 and Begin Beta on 10/15/97

7 Can AT&T OSS handle Trouble Reports on circuits not identified by a telephone number AT&T will check Is this an issue?

ECG can handle designed/complex & non-designed circuit troubles (identical interface to WFA as used in IXC Gateway) If AT&T can't generate electronically, these will have to be called in to the BST work center

AT&T / BellSouth
~~AT&T - PROPRIETARY (RESTRICTED)~~
Solely for authorized persons having a need to know
pursuant to Company Instructions

Tab C-12

Actiview - TAFI
Capability / Functionality Comparison

Features/Functions	TAFI	Actiview + TAFI	Actiview Standard Process	Actiview with Electronic Bonding
Trouble Referral Method	Electronic	Electronic	***Phone Call***	Electronic EBI Standard
Supports POTS	Yes	Yes	Yes	Yes
Supports Spec ckts	***No***	***Rel 11.0 (12/15/97)***	***Rel 11.0 (12/15/97)***	***Rel 11.0 (12/15/97)***
Get Cust records	Yes	Yes (AV & TAFI)	Yes	Yes
Get Tbl status	Yes	Yes (TAFI)	***Verbal***	Yes
Get Tbl history	Yes	Yes (AV & TAFI)	Yes	Yes
Get Cust features	Yes	Yes (AV & TAFI)	Yes	Yes
View Pending Work Orders	Yes	Yes (AV & TAFI)	Yes	Yes
Enables correction of cust features	Yes	Yes (TAFI)	Yes	Yes
Enables PIC vfy	Yes	Yes (TAFI)	***Verbal***	***Yes****
Enables Line test	Yes	Yes (TAFI)	Yes	Yes
View MLT test rslts	Yes	Yes (TAFI)	***Verbal***	Yes
ETTR fm LSP	Yes	Yes (TAFI)	***Verbal***	Yes
Compatible w/ National and Regulatory Metrics Reporting	***No***	***Yes (AV)***	***Yes***	***Yes***
Query Tbl status	Yes	Yes (TAFI)	Verbal	Yes
National Standard	***No***	***No***	***No***	***Yes***
Quantity of Agent Inputs Required	1	2	1 AT&T 1 LSP	1
Additional Training required	Yes	Yes	No	No

Mike McDonnell
07/09/97

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1997 Incremental Cost Comparison

	TAFI	Actiview + TAFI	Actiview - Standard Process	Actiview with Electronic Bonding
Hardware/Software	+ $50,000	+ $50,000	$0	$0
Process / M&Ps	+ $8,000 (est)	+ $8,000 (est)	$0	$0
Training	+ $8,000 (est)	+ $8,000 (est)	$0	$0
CNSC Personnel (Fixed & Variable)	+ $126,000 - $323,000	+ $126,000 - $323,000	$0	-0 8 agents/ $9,000
Total	**+ $192,000 - $389,000**	**+ $192,000 - $389,000**	**$0**	**-$9,000**

- Volume of customers is approximately 150,000 at year 1997 Current YTD national defect rate is 3.49%.

Customer Experience (Interval) Comparison

	TAFI	Actiview + TAFI	Actiview Standard Process	Actiview with Electronic Bonding
Take Incoming Call	5 min	75 min	.25 min.	.25 min
Get & Vfy Customer Records	5 min	1.25 min	75 min	75 min
Determine Preliminary Diagnosis	2.5 min	5 - 6 min	4 -5 min	4 - 5 min
Create Cust Trouble Ticket	5 min	3 5 - 4.5 min	3 - 4 min	3 - 4 min
ETTR given to customer	.25 min	.25 min	.25 min	.25 min
Create Work Order & refer to BST	.25 min	8.25 min	8.0 - 12 min	5 min
MLT Test Run	Background	Background	Background	Background
Update WO w/ BellSouth Close-Out and Repair Info	.5-1.0 min	5 - 5 5 min	4.5 min	5 min
CNSC contacts customer	5 min	5 min	5 min	5 min
CNSC completes and closes CTT	N/A	3.5 min	3.5 min	N/A
Total time (approximate)	10 - 11 min	32.5 - 35 min	29.25 - 35.25 min	14.25 - 16.25 min

Other Considerations

- Impact on the Customer Connectivity National Architecture for OSS and LEC interface needs to be understood.
- BST does not guarantee to continue existing functionality in future.
- Requires customer to select additional voice prompt to route to the BST / TAFI pit in CNSC
- TAFI does not allow trouble referral to IW vendor
- Additional resources needed to do TAFI Sys Admin in CNSC, on-going M&P development & training.
- Requirement to feed BU and Regulatory entities via Actiview, not provided through TAFI (TAFI feeds BellSouth LMOS system where BellSouth reports are derived)

TAFI vs EBI

- TAFI, as described, provides a 30% interval improvement over EBI (4 5 minute)
- TAFI costs $192,000 - $389,000 additional to introduce into CNSC
- TAFI does not provide CMD, BMD and Regulatory reporting requirements Those currently are
  - *Speed of Answer - CNSC (Metric reflects the speed of answer for call rcpt in CNSC)
  - *Abandonment Rate - CNSC (Metric reflects the percent of customer calls abandoned)
  - Center Availability - CNSC (Metric reflects the center availability for call rcpt)
  - *Appointments Met (Metric reflects the percentage of ETTR commitments met)
  - *Time to Restore (Metric reflects the Local Service Providers time to restore)
  - *Repeat Troubles (Metric reflects percentage of repeat troubles for CMD / TSR mkt)
  - Resolution Code Analysis (Metric reflects the resolution code analysis for CMD / TSR mkt)
  - Misdirected Telephone Calls (Metric reflects percentage of misdirected calls into CNSC)
  - *Defect Rate (Metric reflects the defect rate per 100 access lines for CMD / TSR mkt)
  - End to End results
- * Indicates PUC and or FCC requirement. (SR/AV must provide metrics for all states)

Tab C-13



July 21, 1997

Mr Robert Echols
BellSouth Telecommunications Inc
1960 West Exchange Place
Tucker, Georgia 30084

Dear Robert

I am writing you to provide you with AT&T's decision on using BellSouth's TAFI system as an interim maintenance process.

First, let me thank you for providing training to AT&T personnel in May The training was very informative and aided our analysis of the TAFI system Additionally the support in providing documentation and answering our questions about TAFI was invaluable to our analysis.

After considerable consideration and based on the inputs provided, AT&T has decide not to use TAFI at this time. Since AT&T's plan is to utilize Electronic Bonding Interface "EBI" on a long term basis, and since under AT&T's and BellSouth's agreements the interim period until EBI is operational is of short duration, AT&T does not believe that it is an efficient use of resources to convert to TAFI for such a short time frame

It is important that we now focus on having the EBI process operational by 11/15/97, and work toward getting interface agreements in place for the current process We look forward to working with BellSouth on these efforts. Please call me at 404 810-8283 if you have any questions.

Sincerely,

Vincent Doran

Vincent Doran

cc: Pam Nelson
Robert Oakes
Scott Martin
Bob Benson
Arthur Defee

Tab C-14

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF WILLIAM N. STACY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

DOCKET 8354-U

MARCH 6, 1998

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

A My name is William N. Stacy. I am employed by BellSouth Telecommunications, Inc (BellSouth). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am the Assistant Vice President - Services for the Interconnection Operations department of BellSouth Telecommunications, Inc. (BST) In this position, I am responsible for development of the procedures used by BST personnel to process Competitive Local Exchange Carrier (CLEC) service requests, and for assisting the service centers in Interconnection Operations in implementing CLEC contracts in a manner consistent with State Commissions and the Federal Communications Commission (FCC) rules and regulations governing local exchange competition. I have held numerous positions with BST in Network Engineering, Operator Services, Network Planning and Network Operations.

Q. ARE YOU THE SAME WILLIAM STACY WHO PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

1998. The rejects documentation also was provided to CLECs during the October 30-31, 1997 conference and was produced as an exhibit during an OSS proceeding before the Alabama Public Service Commission; it was also included in the January 30, 1998 edits package sent to the CLECs The SOER edits were also a part of this edits package distributed on January 30, 1998. (All of these documents were included as Exhibit WNS-2a-d of my direct testimony.) Ms Closz acknowledged that Sprint received all of this documentation, but complains that Sprint has not had time to review it. To the contrary, Sprint has had plenty of time to review the rejects document, which it received on Oct. 30 If Sprint feels it is unable to move forward with interface development, the fault is not BellSouth's.

The business rule information for version 7.0 of EDI and the technical specifications for the interface which are based on OBF have been provided to the CLECs (via their joint implementation teams) that are developing interfaces for version 7.0.

ISSUES DEALING WITH MAINTENANCE AND REPAIR FUNCTIONS

Q WHAT IS THE STATUS OF THE EBI/ECTA (ELECTRONIC COMMUNICATION/TROUBLE ADMINISTRATION) INTERFACE WHICH AT&T REQUESTED BELLSOUTH BUILD?

A BellSouth completed its development of the ECTA by November 15, 1997, as required by AT&T. Since that time for more than three months, AT&T has continually delayed the implementation of ECTA due to problems with their side of the interface. AT&T has requested weekly delays since the first date change to February 2, 1998. ECTA's current implementation date is March 9, 1998, but that may also be delayed again by AT&T

Q. MR BRADBURY PROPOSES THAT BELLSOUTH BE REQUIRED TO PROVIDE ACCESS TO TAFI FUNCTIONALITY THROUGH THE EBI INTERFACES. DO YOU AGREE?

A. No Mr. Bradbury is confusing AT&T's desired business solution for their maintenance and repair functions with BellSouth's requirements to provide parity of access to this functionality for the CLECs. BellSouth retail units utilize TAFI as their primary tool for managing maintenance and repair functions. BellSouth has provided this same interface for the CLECs.

AT&T's request recognizes that TAFI is superior to the national standard EBI interface, and that adding TAFI's functionality to EBI is a goal worth pursuing, and I agree However, this is additional functionality over and above BellSouth's legal requirements.

RETAIL RATES ON CSRS

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:	
INVESTIGATION INTO DEVELOPMENT OF ELECTRONIC INTERFACES FOR BELLSOUTH'S OPERATIONAL SUPPORT SYSTEMS	Docket No. 8354-U

Room 507
47 Trinity Avenue
Atlanta, Georgia

Wednesday, March 18, 1998

The above-entitled matter came on for hearing pursuant to Notice at 10:07 a.m.

BEFORE:

MAC BARBER, Chairman
ROBERT BAKER, Commissioner
DAVID BAKER, Commissioner

* * *

Q Fair enough. On page 40 of your rebuttal testimony --

A Yes.

Q -- you state at the bottom regarding TAFI that you agree with Mr. Bradbury that adding TAFI functionality to EBI is a goal worth pursuing, is that correct?

A That's correct.

Q Were you aware that AT&T has been requesting access to TAFI through EBI interface since practically April of 1996?

A I will take that subject to check. It's been a number of months, yes.

Q When will BellSouth be able to provide TAFI functionality through EBI interface?

A At the moment I can't give you a definite answer. Whenever BellSouth, AT&T and the standards committee can agree on the transactions to be implemented over that interface, providing it on the BellSouth side of the interface is not nearly as difficult as figuring out what data we're going to send back and forth over the interface. I honestly don't have a good date for that.

Q Is there any reason why BellSouth has to wait -- Well, BellSouth and CLECs in the southern region, in the southern part of the country have to wait for the standards body to rule on this or could they agree on it themselves?

A The reason they are actually -- let me answer your question in two parts. One there are some reasons to go ahead and there are some reasons to wait. The reasons to go ahead would be to get to functionality as early as possible. The reasons to wait are that we do coding, which then is not compliant with, for instance, how MLT queries are to be sent back and forth over that interface and then we all have to recode again next year or later this year, whenever the standard comes out. There are arguments on both sides.

Tab C-15

AT&T

Pamela A Nelson

Room 12N54
1200 Peachtree St NE
Atlanta GA 30309
404 810-3100

April 9, 1998

Ms Jan M Burriss
BellSouth Interconnection Services
1960 West Exchange Place, Suite 200
Tucker Georgia 30084

Dear Jan

This is to advise you that effective immediately, AT&T is suspending implementation and deployment of the Maintenance Electronic Bonding Interface ("EBI")

Because the EBI interface requires significant transaction volumes for it to be cost-effective and because such volumes are unattainable given our inability to get the form of interconnection we need, we are discontinuing its implementation AT&T has previously stated that we cannot continue to pursue entry via resale because it is not a financially viable option AT&T also has been foreclosed from offering local exchange service via the UNE Platform because BellSouth has refused to make the platform available In addition, information we have been provided by BellSouth indicates that local service using UNEs will be designed as private line circuits That being the case, it is unclear whether the EBI interface is usable in a UNE environment Until its utility in that environment is clear, it is not prudent to continue expenditures for its development

In light of the suspension of this EBI capability, BellSouth and AT&T need to maintain the existing manual arrangements to provide repair and maintenance services for any current AT&T local service customers We appreciate your cooperation in maintaining those arrangements

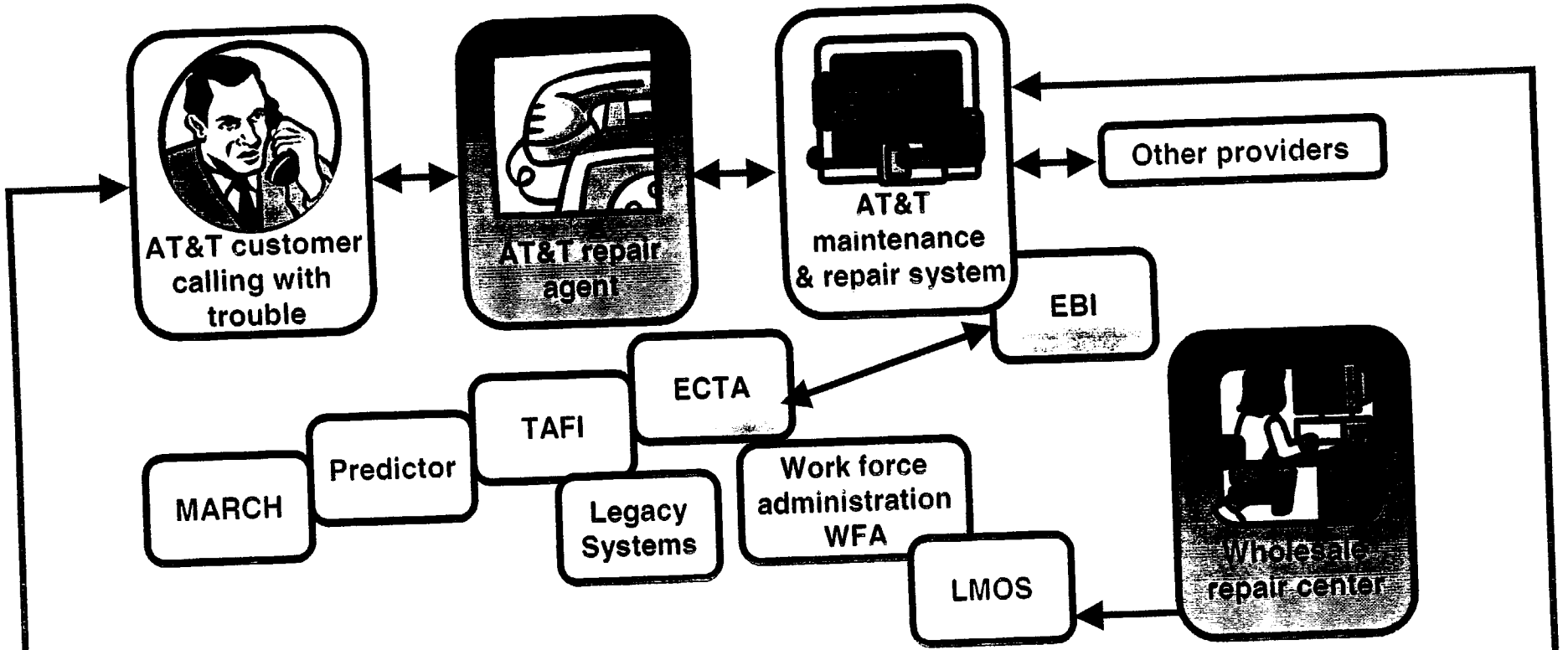
AT&T remains committed to entering local exchange markets where appropriate conditions exist and will obviously need to implement maintenance and repair interfaces to support such entry When the appropriate conditions exist, AT&T will resume its development and implementation of the maintenance and repair interface

Sincerely,

Pam Nelson

cc Ray Crafton
Michelle Augier

Integrated maintenance process with BellSouth



Product - local / LD / wireless / video / internet / data
Provider - ILEC / CAP / other / AT&T
Local connectivity option - resale / UNE interconnection

AT&T internal databases and OSS

- Customer service information
- Customer problem information
- Trouble report information *(current & historical)*
- Facility and equipment information
- Customer billing information

Federal Communications Commission
Washington, D.C. 20554

February 10, 1999

Mr. Sid Boren
Executive Staff Officer
BellSouth Corporation
1155 Peachtree St., N.E., Room 2004
Atlanta, GA 30309

Dear Mr. Boren:

On December 15, 1998, members of the Common Carrier Bureau Staff ("Bureau Staff") met with representatives of BellSouth to discuss interpretations of the Commission's October 13, 1998, BellSouth *Louisiana II* Order as it might be applied in other states in which section 271 applications might be filed.[1] A summary of the discussion is described below. The Bureau Staff indicated that additional information from BellSouth and interested parties would be useful in order for the Bureau Staff to engage in further discussion. The Bureau Staff also indicated that its views were based on information developed since the issuance of the BellSouth *Louisiana II* order. The Bureau Staff stated that its views on any of these issues were in no way binding on the Commission, and that no conclusive determination could be made outside the context of an actual Section 271 application and record.

1. Flow-Through.

Issue. Whether BellSouth can excludes complex orders from its flow-through calculations and what level of disaggregation of flow-through is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response. The Bureau Staff stated its view that, in principle, complex orders that are manually processed for BellSouth's retail customers could be excluded from flow-through calculations. The Bureau Staff also stated its view that, to the extent BellSouth excludes complex orders from its flow-through calculations, the following information should accompany a future Section 271 application: (1) a clear definition of complex orders for CLECs and BellSouth; (2) a demonstration of how BellSouth handles complex orders for its retail customers and CLECs; (3) evidence that complex orders are processed in a nondiscriminatory manner (i.e., performance results and analysis).

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[1] *Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-region, InterLATA Services in Louisiana*, CC Docket No. 98-121, Memorandum Opinion and Order, FCC 98-271 (*BellSouth Louisiana II 271 Order*).

The Bureau Staff also stated its view that BellSouth could exclude from its flow-through calculation orders submitted by CLECs that contained CLEC-caused errors. The Bureau Staff stated its view that the flow-through calculation could be adjusted to exclude CLEC errors, if, in a future Section 271 application, BellSouth (1) defines more clearly what constitutes a CLEC error; and (2) verifies the cause of the errors as being CLEC errors (e.g., through an independent audit).

In response to questions about the appropriate level of disaggregation, the Bureau Staff indicated its view that the proposed levels of disaggregation listed in the *OSS Model Rules NPRM*[3] were appropriate.

2. TAFI Integration

Issue. (1) Whether BellSouth must provide a machine-to-machine repair and maintenance interface in order to meet the nondiscrimination requirement. (2) Absent a machine-to-machine repair and maintenance interface, what evidence is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response. The Bureau Staff stated its view that it did not believe that machine-to-machine repair and maintenance interface is *per se* required. The Bureau Staff noted that the Louisiana II Order found that a lack of machine-to-machine interface for repair and maintenance was not *per se* discriminatory. The Bureau Staff stated its view that, absent a machine-to-machine repair and maintenance interface, BellSouth must demonstrate that the interfaces offered to CLECs provide nondiscriminatory access. The Bureau Staff also stated that additional information was needed to assess the competitive impact that results from a lack of a machine-to-machine interface for repair and maintenance. In order to obtain such information, the Bureau Staff indicated that it would schedule additional meetings with interested parities.

The Bureau Staff stated its view that the following information would assist in evaluating in a future application whether BellSouth's repair and maintenance interface provide nondiscriminatory access: (1) a detailed description of the systems and functionality BellSouth utilizes itself for both designed and nondesigned services; (2) a detailed description of the systems and functionality BellSouth offers to competing carriers; (3) a discussion of what interface functionality competing carriers have requested through the change control process and the status of such request, if any; and (4) performance results for resold services and UNEs by interface type.

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[3] See *Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

3. **Retail Analogues/Performance Standards/Statistical Measurements.**

Issue. Methods of evaluating whether BellSouth's OSS performance meets the nondiscrimination requirement.

Bureau Staff Response. The Bureau Staff asked BellSouth to propose a framework for evaluating whether it is providing nondiscriminatory access to OSS functions and suggested that BellSouth include the following criteria:

- Relevant performance measurements;
- Identification of retail analogues, including level of disaggregation;
- Identification of a benchmark or performance standard where no retail analogue exists (e.g., based on state approved intervals, engineering studies, or other standards);
- A statistical methodology which is used to compare actual performance results to retail analogues or benchmarks;
- A threshold for determining whether differences in performance are competitively significant and whether analysis of the underlying cause for the difference is needed;
- An open process for analyzing the underlying cause for differences of performance;
- Meaningful penalty amounts to prevent "backsliding."

The Bureau Staff also indicated that it would seek industry comment of any framework for evaluting OSS performance proposed by BellSouth.

4. **Complex Ordering/Partial Migration Orders.**

Issue. Whether partial migration and directory listing need to be ordered electronically.

Bureau Staff Response. The Bureau Staff stated its view that there is no retail analog for partial migration orders, and that electronic ordering capability is not required at this time. The Bureau Staff stated its view that BellSouth must demonstrate that the ordering process for complex/partial migration orders meets the nondiscrimination requirement (e.g., provides an efficient competitor a meaningful opportunity to compete). The Bureau Staff also stated its

view that BellSouth should continue upgrading its OSS ordering interface through the change control process.

5. Third-Party Testing -- Demonstration of Operational Readiness.

Issue. In cases where there is little or no commercial usage of an interface, whether BellSouth must engage in third-party testing at the level implemented by Bell Atlantic in New York.

Bureau Staff Response. The Bureau Staff noted that, in its view, internal testing cannot overcome evidence from commercial usage demonstrating inferior service to CLECs. The Bureau Staff stated its view that, where there is no commercial usage or inconclusive commercial usage exists, some form of testing is necessary to demonstrate that the BOC's OSS is operationally ready. The Bureau Staff indicated its view that, while it could not conclude, in the absence of a factual record, whether some forms of internal testing or carrier to carrier testing could demonstrate operational readiness, a third party test would serve as a reasonable "safe harbor." The Bureau Staff noted as two examples of such tests underway in New York and Texas. The Bureau Staff stressed the importance, in its view, of a test plan that included input from interested parties and includes meaningful independent review (e.g., State Commission oversight).

For information purposes, a copy of this letter will be placed in all open section 271 dockets.

Sincerely,

Lawrence E. Strickling

Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission

cc: Ms. Magalie Roman Salas
Secretary
Federal Communications Commission

Federal Communications Commission
Washington, D.C. 20554

February 10, 1999

Mr. Sid Boren
Executive Staff Officer
BellSouth Corporation
1155 Peachtree St., N.E., Room 2004
Atlanta, GA 30309

Dear Mr. Boren:

On December 15, 1998, members of the Common Carrier Bureau Staff ("Bureau Staff") met with representatives of BellSouth to discuss interpretations of the Commission's October 13, 1998, BellSouth *Louisiana II Order* as it might be applied in other states in which section 271 applications might be filed.[1] A summary of the discussion is described below. The Bureau Staff indicated that additional information from BellSouth and interested parties would be useful in order for the Bureau Staff to engage in further discussion. The Bureau Staff also indicated that its views were based on information developed since the issuance of the BellSouth *Louisiana II* order. The Bureau Staff stated that its views on any of these issues were in no way binding on the Commission, and that no conclusive determination could be made outside the context of an actual Section 271 application and record.

1. **Flow-Through.**

Issue. Whether BellSouth can exclude complex orders from its flow-through calculations and what level of disaggregation of flow-through is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response. The Bureau Staff stated its view that, in principle, complex orders that are manually processed for BellSouth's retail customers could be excluded from flow-through calculations. The Bureau Staff also stated its view that, to the extent BellSouth excludes complex orders from its flow-through calculations, the following information should accompany a future Section 271 application: (1) a clear definition of complex orders for CLECs and BellSouth; (2) a demonstration of how BellSouth handles complex orders for its retail customers and CLECs; (3) evidence that complex orders are processed in a nondiscriminatory manner (i.e., performance results and analysis).

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For information purposes, a copy of this letter will be placed in all open section 271 dockets.

Sincerely,

Lawrence E. Strickling

Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission

cc: Ms. Magalie Roman Salas
Secretary
Federal Communications Commission

AT&T

Robert W. Quinn, Jr.
Director - Federal Government Affairs

Suite 1000
1120 20th St., NW
Washington, DC 20036
202 457-3851
FAX 202 457-2545

February 18, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte meeting
Second Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Ms. Roman Salas:

On Wednesday, February 17, 1999, Jay Bradbury, David Eppsteiner, and I, of AT&T, Michael Hou of Community Network, and Karen Reidy and Bryan Greene of MCI, met with Claudia Fox, Jake Jennings, Andrea Kearney, and Claudia Pabo of the Common Carrier Bureau. At the request of Commission staff, the parties reviewed their position of record in this proceeding with an emphasis on the need for a nondiscriminatory machine-to-machine interface for maintenance and repair using the enclosed materials. In sum, we emphasized the dual entry issues (increased errors and cost) imposed with the lack of a machine-to-machine interface that were previously identified by the Commission as the reason machine-to-machine interfaces are required for pre-ordering/ordering functions.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Robert W. Quinn, Jr.

RECEIVED
FEB 18 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attachment

cc: Claudia Fox
Jake Jennings
Andrea Kearney
Claudia Pabo

Recycled Paper

The Need For A Machine-to-Machine Maintenance and Repair Interface

The Competitive Impact

- If CLECs Hope to Compete With Incumbents, They Must Provide Better Customer Service and Lower Prices
  - All Customer Needs Must Addressed On Each Customer Contact
  - A CLEC Must Be Able To Efficiently Access All of An Individual Customer's Data On Every Call
  - Therefore, CLECs Must Be Able to Access Their Data As Well As ILEC Data

Why A Machine-to-Machine Repair Interface Is Necessary

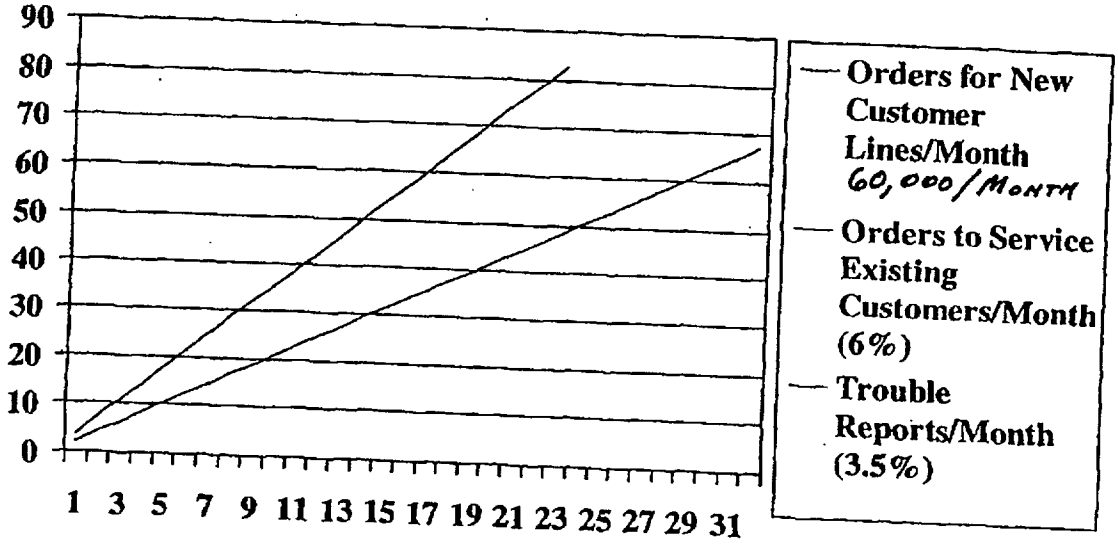
- Billing Data
  - Recurring Repairs Require Customer Credits
- Existing Services
  - Must Be Able to Add/Change Services
  - Must Be Able to Adjust Existing Calling Plans
- CSR Data
  - Necessary to Keep Contact Information Up-to-Date

Why A Machine-to-Machine Repair Interface Is Necessary

- Maintenance and Repair Volumes Will Quickly Equal New Order Volumes
  - Approximately 4% Of Lines Are Treated Monthly
  - 20%-30% of "Non-Migration" Accounts Are Treated Initially
  - Within 2 1/2 Years, Most CLECs Will Be At 1/3 Maintenance and Repair Calls; 1/3 Change Order Calls; and 1/3 New Service Calls

Hypothetical CLEC Business Plan

(7% Penetration of a 25M Line ILEC in 30 Months)



Why A Machine-to-Machine Repair Interface Is Necessary

- M & R Performance Information Is Essential
  - Real Time Access to Call Volume and Connect Time Data is Required for Efficient Staffing
  - CLEC Created Interval and Response Data Necessary to Ensure Parity
  - Without a CLEC's Own Database, CLECs are Left With Monthly RBOC Reports

Additional Cost Incurred Due to Dual Entry

- Lack of Machine-to-Machine Requires CLEC to Engage in Dual Entry
  - Dual Entry Must Occur While Customer Is On-Line for CLEC to Provide Efficient Customer Service Which Incumbent Representative Does Not
  - Dual Entry Is More Time Consuming And Results In More Mistakes, Requiring More Service Representatives

BEFORE THE

TENNESSEE REGULATORY AUTHORITY

DIRECT TESTIMONY OF

GREGORY R. FOLLENSBEE

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 00-00079

DECEMBER 20, 2000

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DIRECT TESTIMONY OF GREGORY R. FOLLENSBEE

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 00-00079

DECEMBER 20, 2000

Q. PLEASE STATE YOUR NAME, ADDRESS AND EMPLOYMENT.

A. My name is Gregory R. Follensbee, and I am employed by AT&T Corp. ("AT&T") as a Director in its Law & Government Affairs organization, providing support for AT&T's regulatory and legislative advocacy in the nine states that make up AT&T's Southern Region. My office is at 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309.

Q. PLEASE DESCRIBE YOUR BACKGROUND AND PROFESSIONAL EXPERIENCE AS THEY RELATE TO ISSUES IN THIS PROCEEDING.

A. I graduated from Florida State University in 1972 with a Bachelors of Science degree in accounting. I began work in August of that year as a field auditor with the Florida Public Service Commission. In 1976, I was promoted to Manager over the accounting group devoted to regulating

electric and gas public utilities. In 1978, I was promoted to Manager over the accounting for all public utilities regulated in Florida. In 1979, I was promoted to Director of the Accounting Department, which expanded my responsibilities to include all accounting matters for all public utilities regulated in Florida, which included auditing, cost of capital, and taxes. In 1980, the department was expanded to include Management Audits as well.

In October 1983, I left the Florida Commission and began work with AT&T. I was a District Manager in its State Governmental Affairs staff organization, supporting AT&T's advocacy of regulatory issues for its Southern Region. In 1990, I became the Assistant Vice President for State Government Affairs for the State of South Carolina. In 1995, I returned to Atlanta and was promoted to Division Manager, responsible for AT&T's regulatory and legislative advocacy in the nine states in AT&T's Southern Region.

Q. HAVE YOU TESTIFIED IN OTHER REGULATORY PROCEEDINGS IN THE PAST?

A. Yes. I have testified in Florida, Georgia, North Carolina and South Carolina.

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

A. I am testifying on behalf of AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc. (I will refer to these two companies as AT&T) on the following issues:

- why calls to Internet Service Providers should be treated as local traffic for purposes of reciprocal compensation (ISP traffic/Issue 1);
- what does "currently combines" mean as that phrase is used in 57 C.F.R. §51.315(b)? (UNEs/Issue 2)
- should BellSouth be permitted to charge AT&T a "glue charge" when BellSouth combines network elements? (UNEs/Issue 3)
- the appropriate terms and conditions that should be applied when AT&T issues orders to migrate services to either network elements or combinations of network elements (UNEs/Issue 4);
- why should Bellsouth bear the total cost of originating local and intraLATA calls from its own customers to AT&T customers (Network Interconnection/Issue 5);
- why AT&T should be able to charge tandem switching and common transport reciprocal compensation charges to BellSouth for calls from BellSouth customers to AT&T customers (Tandem Switch Rate/Issue 7);

- why voice calls over Internet Protocol should not be treated as long distance and why switched access charges should not apply (IP Telephony/Issue 9);
- how the FCC's decision on the availability of local circuit switching should be applied to situations in which AT&T serves customers with four or more lines through combinations of network elements (UNEs/Issue 10); and
- why the alternative dispute resolution process should be an option for resolving disputes arising under AT&T's interconnection agreement with BellSouth (General Terms and Conditions/Issue 16).

Q. WERE YOU PART OF THE TEAM FROM AT&T NEGOTIATING WITH BELLSOUTH ON THE INTERCONNECTION AGREEMENT THAT IS THE SUBJECT OF THIS PETITION?

A. Yes.

Q. WHO ELSE WAS PART OF THE AT&T TEAM?

A. The AT&T negotiating team consisted of two commercial attorneys, a lead negotiator, and two support personnel. From time to time, both AT&T and BellSouth would include subject matter experts in the negotiations to help reach resolution on a particular issue.

Q. WHAT WERE YOUR RESPONSIBILITIES DURING THE NEGOTIATIONS?

A. Because I was involved in the negotiations of the existing interconnection agreement arbitrated by this Authority in 1996, I provided information on what was discussed and agreed to or arbitrated previously in 1996. In addition, I provided input on state and Federal Communications Commission (FCC) regulatory issues that impacted the negotiations.

Q. WHO DID YOU NEGOTIATE WITH AT BELLSOUTH?

A. BellSouth's team consisted of two commercial attorneys, a lead negotiator, one support person and one person from its regulatory group.

Q. WAS AT&T ABLE TO REACH AN AGREEMENT WITH BELLSOUTH ON ALL ISSUES?

A. No. While the vast majority of issues were resolved through negotiations, as can be seen from the agreement attached to AT&T's petition, several issues are still unresolved, and must be arbitrated by this Authority. The issues currently before this Authority for arbitration are ones where the parties "disagree" on the resolution.

Q. WHAT AT&T WITNESSES WILL BE ADDRESSING THESE REMAINING ISSUES?

A. The witnesses supporting AT&T's arbitration petition are as follows:

- Greg Follensbee
- Jay Bradbury
- Ron Mills

ISSUE 1: TREATMENT OF CALLS TO INTERNET SERVICE PROVIDERS

Q. WHAT IS AT&T'S POSITION ON THE PAYMENT OF RECIPROCAL COMPENSATION FOR CALLS ORIGINATED BY A BELLSOUTH CUSTOMER?

A. The law is that for all forms of traffic, whether ISP-bound or otherwise, the party or company responsible for originating a call bears the responsibility for costs associated with that call. Therefore, when an individual makes a local call, the individual and his or her telecommunications carrier are responsible for the costs associated with that call. Along the same lines, when an individual "calls" the Internet, it is AT&T's position that the individual and his or her telecommunications carrier are responsible for the costs associated with that call. For example, if a BellSouth customer calls BellSouth.net, that customer and BellSouth are responsible for the costs associated with that call, just as they are responsible for all other local calls. Neither the receiver, in this case BellSouth.net, nor the receiving telecommunications carrier should bear this responsibility.

Q. WHEN A BELLSOUTH CUSTOMER CALLS AN AT&T ISP CUSTOMER DOES THE RESPONSIBILITY FOR COSTS CHANGE?

A. No. The responsibility for costs is the same (*i.e.*, the originating caller and his or her telecommunications carrier bear responsibility for the costs associated with the call). Assuming the call to the Internet is initiated over standard phone lines, multiple carriers may handle the initial part of the call and its ultimate delivery to the ISP. Each of these carriers then plays a role in delivering the call to its final destination and is thereby entitled to compensation.

When a BellSouth customer calls an AT&T ISP customer, AT&T believes that such traffic should be compensated via reciprocal compensation, because it traverses the AT&T network and is delivered to the AT&T network via the use of a locally dialed number. Within its own network, BellSouth would both originate and terminate this call on a local basis.

Q. WHAT IS THE FCC'S POSITION ON PAYMENT OF RECIPROCAL COMPENSATION FOR CALLS TO THE INTERNET?

A. The FCC stated in its Declaratory Ruling in CC Docket No. 96-98 and Notice of Proposed Rulemaking in CC Docket No. 99-68,[1] that the States are authorized to order reciprocal compensation for this traffic even though it is

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1 Declaratory Ruling in CC Docket No. 96-98 and Notice of Proposed Rulemaking in CC Docket No. 99-68, In Re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Inter-Carrier Compensation for ISP-Bound Traffic, CC Docket Nos. 96-98 and 99-68, FCC 99-68, at ¶ 25 (February 26, 1999) (hereinafter ISP Declaratory Ruling).

jurisdictionally mixed. Moreover, throughout its *ISP Declaratory Ruling*, the FCC referenced the fact that it has previously treated ISP-bound traffic as though it were local.

Q. IS THE FCC POSITION THAT THIS TRAFFIC IS JURISDICATIONALY INTERSTATE STILL VALID?

A. No. On March 24 of this year, the United States Court of Appeals for the D.C. Circuit vacated the ruling of the FCC and remanded the case back to the FCC.[2] The D.C. Circuit determined that the FCC did not provide an adequate explanation why an "end to end" analysis of ISP-bound calls was appropriate for classifying such calls as non-local for purposes of reciprocal compensation. The court noted that the "end to end" analysis has typically been used by the FCC to determine if a communication is jurisdictionally interstate and not whether a call is local. In addition, the Court stated that, when this "end to end" method is applied to ISP-bound calls, the result is not straight forward because ISP calls, which use a packet switched network, could be routed to multiple websites with multiple destination points. The Court found that the "end to end" analysis, for ISP bound calls is not appropriate because such calls are not a single continuous transmission.[3]

In addition, the Court of Appeals determined that the FCC has not provided an adequate explanation why ISP bound traffic should not be classified as

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[2] Bell Atlantic Telephone Companies v. FCC, et al., 206 F.3d 1, 340 U.S. App. D.C. 328 (1999).
[3] Id at 5.

"telephone exchange service" which is subject to the provisions of reciprocal compensation for local traffic rather than "exchange access" or "access service". Pursuant to the analysis of the D.C. Circuit, ISP-bound calls should be treated as local calls subject to reciprocal compensation. Thus, regardless of whether the call is to an ISP customer or any other customer of AT&T, BellSouth should compensate AT&T via reciprocal compensation for the use of AT&T's network for these local calls. In fact, this Authority recently agreed with AT&T's position and determined that 'pending the adoption of a federal rule, dial-up calls to ISPs should be treated as local calls for purposes of reciprocal compensation.'[4] Similarly, the Alabama Public Service Commission, the Georgia Public Service Commission, and the North Carolina Utilities Commission[5] have also found that ISP traffic is local for purposes of reciprocal compensation.

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[4]Interim Order of Arbitration Award, *In Re: Petition for Arbitration of ITC^Deltacom Communications, Inc. with BellSouth Telecommunications Inc., Pursuant to the Telecommunications Act of 1996*, Tennessee Regulatory Authority, Docket No. 99-00430, at p. 33-34. Order Denying BellSouth's Motion to Reject Certain Provisions of Interconnection Agreement and Approving Interconnection Agreement, As Amended, *In Re: Petition of Nextlink Tennessee, L.L.C. For Arbitration of Interconnection Agreement with BellSouth Telecommunications, Inc.*, Tennessee Regulatory Authority, Docket No. 98-00123, at p.9. Final Order of Arbitration Award, *In Re: Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Time Warner Telecom of the Mid-South, L.P. Pursuant to section 252(b) of the Telecommunications Act of 1996*, Tennessee Regulatory Authority, Docket No. 99-00797, p. 5.

[5] Final Order on Arbitration, *In the Matter of petition by ICG Telecom Group, Inc. for Arbitration of Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Alabama Public Service Commission, Docket No. 27069, at p. 19 (rel. Nov. 10, 1999), *aff'd* Order Denying Reconsideration (rel. Feb. 3, 2000). Order, *In Re Petition by ICG Telecom Group, Inc. for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Georgia Public Service Commission, Docket No. 10767-U, at p. 4 (rel. Feb. 1, 2000). Recommended Arbitration Order, *In the Matter of petition by ICG Telecom Group, Inc. for Arbitration of Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*, North Carolina Public Utilities Commission, Docket No. P-582, at p. 8 (rel. Nov. 4, 1999). Proposed Recommended Arbitration Order of the Public Staff, *In the Matter of Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and*

ISSUE 2: DEFINITION OF CURRENT COMBINES

ISSUE 3: APPLICATION OF GLUE CHARGES WHEN BELLSOUTH COMBINES NETWORK ELEMENTS FOR AT&T

Q. BRIEFLY DESCRIBE THE ISSUES REGARDING THE DEFINITION OF "CURRENTLY COMBINES" AND THE APPLICATION OF GLUE CHARGES WHEN BELLSOUTH PROVIDES COMBINATIONS OF NETWORK ELEMENTS TO AT&T.

A. On January 25, 1999, the U.S. Supreme Court upheld FCC Rule 51.315(b)[6]. While BellSouth now agrees that it must provide combinations of network elements, it is proposing to limit when and how they will be provided. Specifically, BellSouth proposes to only provide combinations when there is working telephone service at the customer premise when AT&T places an order for combinations of network elements to serve that customer. BellSouth will not provide cost-based combinations to allow CLECs to servecustomers who order additional lines. Instead, BellSouth proposes to assess a "glue charge" in these situations.

Q. WHAT ARE "GLUE CHARGES?"

A. "Glue charges" are additional non-TELRIC, non-cost-based charges BellSouth is proposing be added to the Authority-approved network element rates for loop/switch port and loop/transport combinations. BellSouth

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Intermedia Communications, Inc. Pursuant to Section 2529b) of the Telecommunications Act of 1996, North Carolina Public Utilities Commission, Docket no. P-55, Sub. 1178 (re. April 13, 2000)

proposes these additional charges based on its position that it is not required to provide loop/switch port or loop/transport combinations in all situations.

Q. HAS THE AUTHORITY RECENTLY ADDRESSED THIS ISSUE?

A. Yes. In its November 22, 2000, order issued in Docket No. 97-01262, the Authority stated in on page 10 that "BellSouth shall provide recurring and nonrecurring costs for UNE combinations already combined in its network." In footnote 17 in its Order, the Authority stated that "BellSouth must provide the combinations throughout its network as long as it provides this same combination to itself anywhere in its network." Based on this language, AT&T believes the Authority has already rendered its decision and has already rejected the BellSouth position on this issue.

Q. WHAT SHOULD THE AUTHORITY DO ON THIS ISSUE?

A. The Authority should affirm the holding in its November 22, 2000, Order in Docket No. 97-01262, and should order AT&T and BellSouth to include language in their new interconnection agreement reflecting that holding.

ISSUE 4: UNDER WHAT RATES, TERMS, AND CONDITIONS MAY AT&T PURCHASE NETWORK ELEMENTS OR COMBINATIONS TO REPLACE SERVICES CURRENTLY PURCHASED FROM BELLSOUTH TARIFFS?

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[6] AT&T Corporation v. Iowa utilities Board, 119 S.Ct. 721, 525 U.S. 366, 142 L.Ed.2d 835 (1999).

Q. EXPLAIN THE ISSUE PERTAINING TO THE APPROPRIATE TERMS AND CONDITIONS THAT SHOULD BE APPLIED WHEN AT&T ISSUES ORDERS TO MOVE TARIFFED SERVICES PURCHASED FROM BELLSOUTH TO EITHER NETWORK ELEMENTS OR COMBINATIONS OF NETWORK ELEMENTS?

A. There is one remaining area of disagreement pertaining to AT&T converting tariffed services to network elements. Since the FCC issued its Supplemental Order Clarification in CC Docket 96-98 on June 2, 2000 ("Supplemental Order Clarification"), most of the disagreement between the parties has been resolved and the parties have reached agreement on the process for submitting requests for conversions. The only remaining issue that the TRA needs to address is the application of termination liability charges to services converted to either unbundled network elements or combination of unbundled network elements, which I will address below.

Q. WHY IS THERE AN ISSUE ON CONVERTING TARIFFED SERVICES TO NETWORK ELEMENTS?

A. In the past, AT&T purchased tariffed services from BellSouth to provide local service to customers in Tennessee. As a result of the Telecommunications Act of 1996 and several FCC orders implementing that Act, AT&T is now able to convert these services to network elements, including combinations of network elements. The FCC issued an order outlining certain criteria AT&T would have to meet in order to obtain these

conversions from BellSouth. The issue that BellSouth has raised is whether BellSouth should be allowed to charge AT&T any cancellation charges for converting these tariffed services to network elements.

Q. WHAT CANCELLATION CHARGES ARE INVOLVED?

A. While the exact charges that may apply are dependent upon the specific service purchased by AT&T from BellSouth's tariffs, generally cancellation charges are assessed whenever tariffed services are purchased under some term or volume plan, and the purchaser decides to cancel the service before the end of the term of the plan. In most such cases, the service is completely terminated and not replaced with another service.

Q. TO WHAT NETWORK ELEMENTS OR COMBINATIONS OF NETWORK ELEMENTS WOULD THE TARIFFED SERVICES BE CONVERTED?

A. Predominantly, AT&T is looking to convert special access services to either unbundled loops or loop/transport combinations (commonly known as Enhanced Extended Links or EELs) that begin at a customer's premise and terminate into AT&T collocation space in a BellSouth central office, where AT&T then terminates the trunk in one of its switches used to provide local service.

Q. WHAT IS AT&T PROPOSING?

A. AT&T is proposing that it should not be assessed any cancellation charges when requesting to convert services originally purchased from BellSouth's tariffs to network elements or combinations of network elements. AT&T originally purchased these tariffed services mainly because BellSouth was unwilling to provide combinations of network elements in lieu of special access. Rather than wait for the issue to be fully resolved either through regulatory proceedings or litigation, AT&T utilized the only option it had available. AT&T and its customers should not be penalized for BellSouth's refusal to provide combinations of network elements. Furthermore, the FCC did not state or even imply that ILECs were free to impose a penalty upon CLECs for such conversions. What BellSouth seeks to do contravenes the clear intent of the FCC. If the TRA approves BellSouth's proposal, then BellSouth ultimately ends up with what it wanted all along - CLECs would not be able to use network elements to serve customers who are currently served through special access service. The TRA should not allow CLECs to be penalized when converting the purchase of special access services to network elements.

Q. IS AT&T CANCELING SERVICE PURCHASED FROM BELLSOUTH?

A. No. AT&T is seeking to convert the existing tariffed services to network elements or combinations of network elements. The customers will still

receive the same service from AT&T and the service provided by BellSouth to AT&T will remain the same.

Q. WHAT IS AT&T ASKING THE TO TRA DO?

A. AT&T requests that the TRA order that no cancellation charges apply when AT&T requests to convert services purchased out of BellSouth's tariffs to network elements, including combinations of network elements.

ISSUE 5: LOCAL INTERCONNECTION

Q. BRIEFLY DESCRIBE THE ISSUE REGARDING NETWORK ARCHITECTURE.

A. This issue concerns a dispute about who will bear the costs of transporting local traffic between the BellSouth and AT&T networks in Tennessee. In particular, it concerns the question of whether BellSouth should be responsible for the costs of originating, transporting, and terminating local calls from its own customers to AT&T customers in Tennessee. BellSouth has inaccurately portrayed this as a question of whether its subscribers should pay for the design of the AT&T network in Tennessee. I want to dispel that myth at the outset: the AT&T proposal will not in any way impose any additional financial burden on any BellSouth customers in Tennessee.

Indeed, the real question is whether AT&T should be forced to design its network less efficiently and incur higher costs simply because BellSouth refuses to transport its own originating traffic, as it is required to do as it has

historically done, and as it continues to do for calls to its own customers. The focus of this issue should be on the harm to competition and consumers caused by the BellSouth proposal and on the illegality of the BellSouth proposal under the Telecommunications Act of 1996 (the "Act") and FCC regulations.

Q. WHAT HAS GIVEN RISE TO THIS ISSUE?

A. In order to interconnect the BellSouth and AT&T networks, the two parties must deploy Interconnection Facilities between the switches serving AT&T's customers and the end office switches serving BellSouth customers and the subtending BellSouth tandem switches.[7] The parties must then establish trunking between these switches for the efficient routing of interconnection traffic.

As I explain in greater detail below, to effectively compete for local exchange customers in Tennessee, AT&T has designed and deployed a network architecture that is substantially different than the embedded BellSouth network. This means that some calls from BellSouth customers to AT&T customers must be transported beyond the BellSouth local calling areas to be delivered to the AT&T switch serving the terminating AT&T customers. Despite unequivocal legal obligations requiring each party to

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[7] Interconnection Facilities are the physical transmission channels that transport traffic between the AT&T and BellSouth switches that are used for local and intraLATA toll traffic. Facilities should be differentiated from trunks or trunk groups, which are the logical connections between two switches permitting traffic to be routed in an efficient manner. Trunks are established over working facilities.

bear the cost to transport and terminate its own traffic, BellSouth objects to bearing any costs for Interconnection Facilities beyond the BellSouth local calling areas. This is true even though both parties have agreed that calls throughout each LATA will be considered local for purposes of reciprocal compensation. This means that BellSouth is proposing that AT&T bear the cost of transporting BellSouth's own traffic from BellSouth's calling areas to AT&T's switch for completion of such calls to AT&T's customers.

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

A. BellSouth's position is that it is not responsible for all of the costs of originating, transporting, and terminating its own traffic for calls from its customers to AT&T customers. Rather, BellSouth asserts that it should have the unilateral and arbitrary right to designate a point within each of its Tennessee local calling areas where its responsibilities will end. Instead of transporting its own calls to their terminating (switch) destinations in a LATA, BellSouth will only deliver its local and intraLATA traffic to the points designated by BellSouth and will require AT&T (and its customers) to bear the cost of transporting and terminating BellSouth's traffic beyond those points. Meanwhile, BellSouth wants AT&T to be financially responsible for delivering AT&T's originating traffic (calls from AT&T customers to BellSouth customers) to each and every BellSouth end office. Thus, according to BellSouth, AT&T is financially responsible for delivering its own originating calls into every BellSouth end office, but BellSouth is not

financially responsible for delivering its originating traffic beyond the boundaries of its local calling areas to the location of the AT&T switch in the LATA.

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

A. AT&T's position is that the responsibility for originating, transporting, and terminating traffic should be mutual and that each party should be financially responsible for transporting its own originating traffic to a comparable point on the terminating party's network (i.e., the other party's switch serving the terminating customer). AT&T, and all CLECs, should be permitted to choose the most efficient interconnection point, as the law allows. CLECs should not have to design their networks less efficiently, and their customers should not shoulder the burden of higher costs simply because BellSouth refuses to transport its own originating traffic as it is required to.

Q. WHAT SHOULD THE AUTHORITY DO?

A. The Authority should adopt AT&T's network interconnection proposal. This proposal imposes on both parties the same relative obligations to transport and terminate traffic (i.e., equivalent interconnection). The Authority should thus continue to incorporate the longstanding policy that the originating party pays for the cost of its own traffic. Unlike BellSouth's proposal, which places unequal obligations on the parties, substantially advantaging

BellSouth, AT&T's proposal establishes equivalent interconnection, giving no party any advantage over the other.

Q. YOU MENTIONED THAT BELLSOUTH'S AND AT&T'S NETWORK ARCHITECTURES ARE SUBSTANTIALLY DIFFERENT. WHAT DO YOU MEAN BY THIS STATEMENT?

A. AT&T's and BellSouth's networks are similar in the sense that the two networks cover comparable geographic areas. This matter is discussed in greater detail later in my testimony under Issue 12. Beyond this one similarity, however, the two networks are substantially different with respect to their architecture.

BellSouth's network is a multi-layer or tiered network. BellSouth has many end office switches spread out over its service area and installed in the neighborhoods populated by its customers. These end office switches are interconnected by an overlying network of tandems. When certain volume levels are achieved and it is cost effective, BellSouth uses high-capacity trunks that directly link certain end office switches (bypassing the tandems). BellSouth's network architecture is depicted in Exhibit GRF-1 to my testimony. This hierarchical or layered network was deployed when there were limited transport options on the end-user side of the switch, resulting in many switches deployed in the neighborhood (thus, keeping loop lengths relatively short), as was dictated by the technology of the times. As I understand it, BellSouth finds the use of its tandem switches to be the least

costly method of interconnecting many end offices until certain traffic thresholds are achieved between two end offices, and only then is it more efficient for BellSouth to directly connect the two end offices. This arrangement recognizes that BellSouth's tandem facilities (both switch and common shared transport) are less expensive to utilize for occasional use than the capacity commitment associated with dedicated transport, until enough traffic develops to fill the dedicated transport.

Q. WHAT ABOUT AT&T'S NETWORK?

A. AT&T, in contrast to BellSouth, began its local telephony deployment only recently. Therefore, AT&T's switches[8] are deployed consistent with the costs and efficiencies of today's technology. Currently, AT&T has a menu of options that are capable of economically connecting end users located relatively far from a switch. These options include: (1) high capacity fiber optic rings to commercial buildings and multiple dwelling units; (2) fixed wireless technology now being beta tested (although this technology would likely come under a different (CMRS) interconnection agreement), (3) UNE loop resale through AT&T collocation in BellSouth end offices, and (4) dedicated high-capacity facilities (in some cases using special access services purchased from BellSouth but more appropriately through combinations of UNEs). Due to the very high initial cost of switching platforms as compared

to the lower incremental cost of high-capacity facilities, AT&T has chosen to deploy fewer switches and more transport on the end-user side of the switch. (Even where AT&T has determined the need for multiple switches within a LATA, they are often collocated within the same building.) The distinction between the two networks is that while BellSouth deploys tandems first and then grows into high use dedicated trunking between offices, AT&T deploys a single switch combined with long transport on the end-user side of the switch, because that combination is incrementally less costly than adding a new switch in each part of a market. AT&T's network architecture is depicted in Exhibit GRF-2 to my testimony.

Consistent with AT&T's architecture, there are certain LATAs in which AT&T has not physically deployed a switch the LATA. AT&T has agreed that in such cases, AT&T will establish at least one physical Point of Interconnection (POI)[9] in the LATA, and AT&T will provide all of the facilities (for both originating and terminating traffic) between its switch and such POI. Where AT&T has chosen not to deploy a switch within a LATA, the POI will be treated as if it were an AT&T switch (i.e., AT&T has virtually extended its switching functionality into the LATA to the POI). The AT&T architecture, therefore, provides a switch (or switching presence) in every BellSouth LATA. Further, although AT&T believes it has the legal

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[8] Although AT&T switches normally provide both an end office and tandem function and are really multi-function switches, I will refer to them in this testimony simply as "switches." In AT&T's proposed Interconnection Agreement, they are referred to as "switch centers."

right to establish a POI at the most efficient, technically feasible point, AT&T is willing, under its proposal, to establish at least two physical POIs within each LATA where BellSouth provides service today unless there is a de minimus volume of traffic throughout the LATA.

Q. WHY DIDN'T AT&T DEPLOY A NETWORK ARCHITECTURE THAT IS SIMILAR TO BELLSOUTH'S?

A. Considering the number of customers AT&T serves, the volume of AT&T's traffic these customers generate, and the geographic dispersion of these customers, the BellSouth network architecture would be highly inefficient for AT&T. Yet, that is exactly what BellSouth proposes: that AT&T be required to replicate the BellSouth network architecture for network interconnection, or at least be required to incur the cost that would be associated with replicating the BellSouth architecture.

Q. DO YOU HAVE DIAGRAMS THAT DEPICT THE COSTS ASSOCIATED WITH ORIGINATING, TRANSPORTING AND TERMINATING TRAFFIC AS YOU DESCRIBE IN YOUR TESTIMONY?

A. Yes. Exhibit GRF-3 to my testimony depicts the costs that an ILEC incurred to complete a call prior to the Act. Exhibit GRF-4 to my testimony depicts

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[9] As used in this testimony POI means the point at which the two networks are physically interconnected for the mutual exchange of traffic.

the costs that an originating carrier is expected to incur to compete a call between competing LECs under the Act. Exhibit GRF-4 also depicts AT&T's proposed interconnection arrangement. Please note that in GRF-4 the costs are allocated between the parties in the exact same manner when each party is in the position of originating carrier and again as the terminating carrier.

Exhibit GRF-5 depicts BellSouth's interconnection proposal. If you compare how the transport costs are allocated to each party in this diagram, it is clear that the BellSouth interconnection proposal is not reciprocal and that BellSouth has shifted a large portion of its interconnection costs to AT&T. Exhibit GRF-5 shows that AT&T would bear all of the costs to deliver its traffic to the BellSouth network when AT&T is the originating carrier and that AT&T again would bear all of the costs to carry BellSouth 's traffic back to the AT&T network when BellSouth is the originating carrier.

Q. WHAT WOULD BE THE CONSEQUENCES OF REQUIRING AT&T TO INTERCONNECT WITHIN EACH LOCAL CALLING AREA?

A. Such a requirement would have two adverse affects on Tennessee consumers. First, they would lose the benefits of the efficient network architectures deployed by AT&T and other CLECs, producing higher network costs. Second, it would shift to CLEC consumers the transport costs that BellSouth is required to lawfully bear under the Act. The interconnection arrangement proposed by BellSouth would be extremely unfair to CLEC consumers,

substantially more favorable to BellSouth and would suppress investment in competitive facilities. The higher costs that CLEC consumers would be forced to bear under BellSouth's proposal would make those Tennessee markets that would have been marginally profitable under AT&T's interconnection proposal, uneconomic to serve. Simply put, BellSouth's interconnection proposal is harmful to competition and thus consumers in Tennessee. AT&T has proposed, and my testimony explains, that the interconnection arrangement adopted by the Authority should be neutral to either party's network architecture (i.e., each party should have the same relative obligations when it is in the role of originating carrier) and should require each party to bear the costs to transport and terminate its own traffic.

Q. WHY IS BELLSOUTH'S PROPOSED INTERCONNECTION ARRANGEMENT UNFAIR TO AT&T AND ITS CUSTOMERS?

A. Under BellSouth's proposed interconnection arrangement, AT&T and BellSouth would have substantially inequitable obligations to provide interconnection facilities. AT&T would be financially responsible for the delivery of its traffic to each BellSouth end office, and BellSouth would deliver its traffic to AT&T no further than its own local calling area. This situation is unfair to AT&T and its customers, because the parties do not have reciprocal interconnection obligations, even though the BellSouth and AT&T networks cover geographically comparable areas and have symmetrical compensation rates.

Q. WHY SHOULD THE AUTHORITY REQUIRE AT&T AND BELLSOUTH TO INTERCONNECT ON AN EQUIVALENT BASIS?

A. First of all, as I discuss below, the law requires it. Moreover, as I have previously stated, AT&T's network covers a comparable geographic area to BellSouth's network. This is supported by the evidence provided under Issue 12. If a CLEC has only a small network and only offers services over a small geographic area or only to an exclusive group of customers, then that CLEC's network would not be comparable to BellSouth's network. But AT&T has made substantial network investments in Tennessee, and AT&T offers its local exchange services without regard to location. Therefore, the Authority should require that the BellSouth and AT&T networks be interconnected on an equivalent basis.

BellSouth's interconnection proposal completely disregards the geographic comparability of the two networks. Ignoring the legitimacy of AT&T's network architecture, BellSouth proposes that the two networks be interconnected solely on the basis of *BellSouth's* network architecture. In other words, BellSouth is asking the Authority to ascribe an arbitrary primary status upon BellSouth's network. BellSouth may believe that its network is entitled to this arbitrary status because it pre-existed local telephone competition or is based on a traditional hierarchical network architecture, but the Authority should not be led into making such a decision.

Q. SHOULD THE BELLSOUTH LOCAL CALLING AREA BE THE BASIS FOR INTERCONNECTING THE TWO PARTIES NETWORKS?

A. No. BellSouth's local calling areas should not be the basis of network interconnection. First, there is no logical reason to use local calling areas. BellSouth's original local calling areas were established for the purpose of setting rates solely for BellSouth's customers. They bear no relationship to the capacity of switches and other facilities deployed by CLECs or BellSouth. Moreover, in today's telecommunications environment, there is no such thing as "a" local calling area. For some time BellSouth has offered EAS plans and now even offers LATA-wide local calling areas. These various calling plan options dispel any suggestion that there is any real significance to the geographic scope of any given local calling area. Moreover, BellSouth's local calling areas may be subject to substantial changes as BellSouth and its competitors seek competitive advantages for their respective local service offerings. More fundamentally, interconnection based solely on BellSouth's local calling areas does not foster competition and does not benefit consumers. To interconnect based on BellSouth's local calling areas would completely disregard the legitimacy of a competitor's local calling areas, would discourage competitors from expanding local calling areas for the benefit of Tennessee customers and competition, and certainly would not be reciprocal. Moreover, using BellSouth's local calling areas as the basis of network interconnection substantially compromises the

network efficiencies of the alternative network architectures deployed by AT&T, forcing AT&T into an inefficient BellSouth-look-a-like interconnection arrangement, and forcing CLEC customers to bear the burden of those inefficiencies.

Q. IS AT&T IMPROPERLY ATTEMPTING TO SHIFT FACILITY COSTS FROM AT&T TO BELLSOUTH FOR AT&T'S CUSTOMERS' TRAFFIC THAT TERMINATES ON BELLSOUTH'S NETWORK?

A. No. AT&T believes that it is responsible for the costs of originating, transporting and terminating its own traffic. Accordingly, AT&T proposes that it should provide (either lease or build) all of the facilities for its originating traffic between the AT&T switch and the POI selected by AT&T, and that AT&T should compensate BellSouth for any transport and switching functions provided by BellSouth for the completion of AT&T's traffic in the form of reciprocal compensation. Regardless of any claims by BellSouth to the contrary, AT&T agrees to bear the full financial costs of its own traffic.

Contrary to AT&T's fair, reciprocal and lawful position, BellSouth is trying to shift its interconnection facility costs to AT&T. BellSouth retains the vast majority of end users and the revenue these customers produce, yet BellSouth seeks to avoid compensating AT&T for AT&T's costs in terminating traffic from BellSouth's end-users. This provides BellSouth with an unlawful competitive advantage. Accordingly, the Authority should reject the BellSouth proposal and adopt the AT&T proposal.

Q. BUT DOESN'T THE BELLSOUTH PROPOSAL REFLECT THE ADDITIONAL COSTS THAT BELLSOUTH MUST INCUR TO PROVIDE FACILITIES FROM ITS LOCAL CALLING AREA TO THE AT&T SWITCH?

A. No. The BellSouth proposal is nothing more than an anti-competitive proposal to unilaterally designate interconnection points for BellSouth-originated traffic. If BellSouth designates interconnection points at end offices some distance from the AT&T point of presence, the inter-carrier compensation will not be symmetrical. Indeed, BellSouth's proposal confirms the FCC's conclusion that:

> Because an incumbent LEC currently serves virtually all subscribers in its local serving area, an incumbent LEC has little economic incentive to assist new entrants in their efforts to secure a greater share of that market. An incumbent LEC also has the ability to act on its incentive to discourage entry and robust competition by not interconnecting its network with the new entrant's network or by insisting on supracompetitive prices or other unreasonable conditions for terminating calls from the entrant's customers to the incumbent LEC's subscribers.[10]

Q. HOW DOES THE ACT APPLY TO THIS ISSUE?

A. Prior to the passage of the Act, unless a call was directed to the operating territory of another local carrier, the originating carrier was responsible for

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[10] First Report and Order, *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, 11 FCC Rcd. 1J499 (1996) at ¶ 10 (footnote omitted), hereinafter "FCC Local Competition Order".

the costs of originating, transporting and terminating each call, simply because the call never left the originating carrier's territory or network. Consistent with the originating carrier's overall financial responsibility, the originating carrier collected and retained the applicable revenue.

With the passage of the Act, the originating carrier continues to collect and keep the local exchange revenue, and where a competing LEC is used to terminate the call (because the terminating customer belongs to a competing LEC), the Act establishes reciprocal compensation to compensate the terminating carrier for its costs. However, in so doing, the Act did not alter the long-standing economic model under which the originating carrier collects the local exchange revenue and is responsible for the costs of originating, transporting and terminating its traffic. Section 252(d)(2)(A) of the Act states:

> [A] a state TRA shall not consider the terms and conditions for reciprocal compensation to be just and reasonable unless... such terms and conditions provide for the mutual and reciprocal recovery by each carrier of costs associated with the transport and termination on each carrier's network facilities of calls that originate on the network facilities on the other carrier.

If the parties have unequal interconnection obligations, as proposed by BellSouth, then the parties should have non-symmetrical reciprocal compensation rates, so that each party would recover its respective costs of transporting and terminating the other party's traffic. To meet the "just and reasonable" test under Section 252(d)(2)(A), the parties must have comparable obligations to deliver traffic to the other party's network. If it is

found that one party to the Agreement is not compensated for "costs associated with the transport and termination on each carrier's network facilities of calls that originate on the network facilities on the other carrier", then the resulting Agreement would be neither "just" nor "reasonable".

Q. IF AT&T CHOOSES TO PLACE ONE SWITCH PER LATA, SHOULDN'T BELLSOUTH BE ALLOWED TO PLACE ITS INTERCONNECTION POINT AT ITS DESIRED LOCATION?

A. No. The Act and FCC orders clearly allow CLECs to interconnect at any technically feasible point. The single switch presence per LATA allows CLECs to grow their business economically without having to duplicate the ILEC's existing network. If Congress had wanted ILECs to have the ability to designate interconnection points and CLECs to bear the same duty in establishing interconnection points that ILECs have, it would have specifically stated that outcome, rather than separating out the interconnection obligations to apply only to ILECs under Section 251(c)(2).

Q. HAS THE FCC PROVIDED ANY GUIDANCE ON THIS ISSUE?

A. Yes. This issue has two sub-parts. First, should BellSouth have the right to designate the point on BellSouth's network within its own local calling area where it will deliver its local and intraLATA traffic to AT&T? Second, how should the costs of Interconnection Facilities be allocated between the parties? The FCC has spoken on both of these issues.

Q. DO EXISTING FCC RULES ALLOW BELLSOUTH TO DESIGNATE THE POINT ON ITS NETWORK WHERE AT&T MUST ACCEPT BELLSOUTH'S TRAFFIC?

A. No. FCC regulations do not allow BellSouth or any ILEC the right to designate the point at which the other party must "pick up" the ILEC's traffic. To the contrary, Rule 51.305(a)(2) obligates BellSouth to allow interconnection by a CLEC at any technically feasible point. In its Local Competition Order, the FCC explained:

> The interconnection obligation of section 251(c)(2), discussed in this section, allows competing carriers to choose the most efficient points at which to exchange traffic with incumbent LECs, thereby lowering the competing carriers' costs of, among other things, transport and termination of traffic.[11]

The FCC identified the Act as the source of these differing obligations:

> Section 251(c)(2) does not impose on non-incumbent LECs the duty to provide interconnection. The obligations of LECs that are not incumbent LECs are generally governed by sections 251(a) and (b), not section 251(c). Also, the statute itself imposes different obligations on incumbent LECs and other LECs (i.e., section 251(b) imposes obligations on all LECs while section 251(c) obligations are imposed only on incumbent LECs).[12]

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[11] FCC Local Competition Order at ¶ 172 (emphasis added).
[12] Id. at ¶ 220.

Q. DOES THE FACT THAT THERE IS NO PROHIBITION AGAINST ILECS DETERMINING TECHNICALLY FEASIBLE INTERCONNECTION POINTS GIVE THEM THE RIGHT TO DO SO?

A. No. As noted above, the interconnection obligations of CLECs and ILECs are specifically identified in the Act. BellSouth may not assume some authority that is not provided for in the Act. BellSouth has claimed in other proceedings that its should be permitted to designate the point where AT&T must pick up BellSouth's traffic so that BellSouth may avoid the transport costs at issue. However, the FCC's statement is clear. The CLEC has the right to designate the point at which traffic is exchanged, "thereby lowering the competing carriers' costs." BellSouth has no such right. The FCC reiterated its reasoning in connection with an interconnection dispute in Oregon, where the FCC intervened and urged the court to reject US West's argument that the Act requires competing carriers to interconnect in the same local exchange in which it provides local service. The FCC explained:

> Nothing in the 1996 Act or binding FCC regulations require a new entrant to interconnect at multiple locations within a single LATA. Indeed, such a requirement could be so costly to new entrants that it would thwart the Act's fundamental goal a opening of opening local markets to competition.[13]

More recently, in its order on SBC's 271 application for Texas, the FCC made clear its view that under the Telecommunication Act, CLECs have the legal right to designate the most efficient point at which to exchange traffic.

As the FCC explained:

> New entrants may select the most efficient points at which to exchange traffic with incumbent LECs, thereby lowering the competing carriers' cost of, among other things, transport and termination.[14]

The FCC was very specific:

> Section 251, and our implementing rules, require an incumbent LEC to allow a competitive LEC to interconnect at any technically feasible point. This means that a competitive LEC has the option to interconnect at only one technically feasible point in each LATA.

Q. WHAT HAS THE FCC PROVIDED ON HOW COSTS OF INTERCONNECTION FACILITIES SHOULD BE ALLOCATED BETWEEN THE PARTIES?

A. 47 C.F.R. § 51.703(b) very clearly provides: "A LEC may not assess charges on any other telecommunications carrier for local telecommunications traffic that originates on the LEC's network."

Further, 47 C.F.R. § 51.709(b) reads:

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[13] Memorandum of the FCC as Armucus Curiae at 20-21, *US West Communications Inc. v. AT&T Communications of the Pacific Northwest, Inc.*, (D. Or. 1998) (No. CV 97-1575- JE) (emphasis added).

[14] Memorandum Report and Order, *Application of SBC Communications Inc., Southwestern Bell Telephone Company and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell*

> The rate of a carrier providing transmission facilities dedicated to the transmission of traffic between two carriers' networks shall recover only the costs of the proportion of that trunk capacity used by an interconnecting carrier to send traffic that will terminate on the providing carrier's network.

In its Local Competition Order, the FCC explained:

> The amount an interconnecting carrier pays for dedicated transport is to be proportional to its relative use of the dedicated facility. For example, if the providing carrier provides one-way trunks that the inter-connecting carrier uses exclusively for sending terminating traffic to the providing carrier, then the inter-connecting carrier is to pay the providing carrier a rate that recovers the full forward-looking economic cost of those trunks. The inter-connecting carrier, however, should not be required to pay the providing carrier for one-way trunks in the opposite direction, which the providing carrier owns and uses to send its own traffic to the inter-connecting carrier.[15]

A simple hypothetical example should make the application of this rule clear. If there were a sufficient volume of traffic between an AT&T switch and a certain BellSouth end office, AT&T would elect to establish one-way trunks between the two switches to deliver AT&T's originating traffic. The least costly method for AT&T to obtain the transport needed for such trunks may be to lease the capacity from BellSouth as dedicated transport. BellSouth would also need to establish one-way trunks between the same two switches for its originating traffic. BellSouth almost certainly will establish such trunks on its own facilities. What we end up with is a

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Long Distance, Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region InterLATA Services in Texas, CC Docket No. 00-65 at ¶ 78 (June 30, 2000).

single BellSouth facility system between the AT&T and BellSouth switches that is used to carry both AT&T's one-way trunks and BellSouth's one-way trunks. What the FCC is saying in C.F.R. 51.709(b) is that BellSouth may only recover the cost of the proportion of that trunk capacity used by AT&T between the two switches to send traffic that will terminate on BellSouth's network. AT&T agrees that it would pay for the transport for its one-way trunks. However, contrary to 47 C.F.R. 51.709(b), what BellSouth proposes is to recover the costs of both AT&T's portion *and* the costs of the proportion of that trunk capacity used by BellSouth to send traffic that will terminate on AT&T's network. This would be especially onerous to AT&T when the volume of traffic originated on BellSouth's network far exceeds the volume of traffic that is originated on AT&T's network.

The situation is identical when AT&T elects to route traffic via a BellSouth tandem switch rather than via direct end office trunks. Again, AT&T agrees to pay BellSouth for the one-way trunk capacity needed to transport AT&T's traffic between the AT&T switch and the BellSouth tandem, however, AT&T should not be required to pay BellSouth for one-way trunks in the opposite direction, which BellSouth owns and uses to send its own traffic to AT&T.

Q. HAS THE FCC ISSUED ANY DECISIONS ON THIS ISSUE?

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[15] FCC Local Competition Order at ¶ 1062 (emphasis added).

A. Yes. In *In re TSR Wireless, LLC, et. al., v. U.S. West,* file Nos. E-98-13, et. al., FCC 00-194 (June 21, 2000), several paging carriers alleged that US West and other ILECs had improperly imposed charges for facilities used to deliver LEC-originated traffic. The paging carriers based their complaint on 47 C.F.R. § 51.703(b) and sought an order from the FCC prohibiting the ILECs from charging for dedicated and shared transmission facilities used to deliver LEC-originated traffic. The FCC agreed with the paging carriers. In its Order, after finding (1) that paging carriers provide telecommunications services and are thus included within the scope of the rules governing reciprocal compensation (47 C.F.R. § 701(e)) and (2) that paging carriers "switch" and "terminate" traffic within the meaning of those rules, the FCC determined that "any LEC efforts to continue charging CMRS or other carriers for delivery of such [LEC-originated] traffic would be unjust and unreasonable." Accordingly, the FCC concluded that the ILECs "may not impose upon Complainants charges for the facilities used to deliver LEC-originated traffic to Complainants."

Q. WHY SHOULD THE AUTHORITY ADOPT AT&T'S SOLUTION?

A. AT&T's network interconnection solution will benefit AT&T, BellSouth and Tennessee consumers in the following ways:

1. AT&T's solution is fair to both parties.

First, both parties would establish equivalent interconnection between their respective networks. Neither party would gain a substantial advantage over

the other. Second, each party would provide interconnection facilities in proportion to the interconnection traffic that it delivers to the other party. Considering the geographic parity of both parties' networks, it would clearly be unfair to AT&T to adopt the practice of disproportional, unequal interconnection.

2. AT&T's solution promotes competition.

AT&T's proposal allows competing callers to use alternative network architecture without any penalty. Additionally, AT&T's proposal does not require CLECs to duplicate the network already established by BellSouth. Less costly and more efficient solutions are promoted, not discouraged.

3. AT&T's solution provides flexibility to the parties.

Each party would have a variety of methods that it may employ to deliver its traffic to the other party's terminating switch. Parties can lease facilities from one another, they can lease facilities from third parties, implement a mid-span meet, or they can deliver their traffic using AT&T's facilities. Under AT&T's proposal, even though not obligated to do so, AT&T is even willing to offer BellSouth space, power, and site services in its switching centers, compensated appropriately, so that BellSouth may use its own facilities to deliver its interconnection traffic to such AT&T locations. In this way, each party may determine for itself the most efficient method of interconnection under the terms of the Agreement.

4. AT&T's solution allows AT&T to use scarce collocation space for interconnection to UNEs.

BellSouth's proposed interconnection arrangement jeopardizes AT&T's local market entry plans, because it allows BellSouth to "hand-off" its traffic at a BellSouth location that may have limited or no additional collocation space. AT&T has found that the smaller AT&T collocation arrangements in certain BellSouth end offices are being prematurely exhausted by the transport of BellSouth's interconnection traffic through such collocation space. AT&T requires collocation space within BellSouth end offices so that AT&T may interconnect to BellSouth's UNEs in order to fulfill its market entry plans. Because of this duel need for collocation space, BellSouth's proposal forces AT&T to choose between essential uses of scare collocation space. The result of BellSouth's proposal is that in many areas AT&T's local market entry may be delayed or thwarted. AT&T's solution provides for a joint transition plan that would require BellSouth's interconnection traffic to be transitioned from any existing POI in jeopardized AT&T collocation space to a new POI. The Authority should adopt AT&T's network interconnection solution, because otherwise, consumers served by a BellSouth end office for which AT&T's collocation space is exhausted would not enjoy the same level of local exchange competition as customers in unaffected areas.

5. AT&T's solution is consistent with law and regulation.

The FCC has made clear that ILECs do not have the right to determine where CLECS must interconnect to pick up ILEC traffic. CLECs can interconnect

at any technically feasible point, and can select a point that is most efficient to lower costs. AT&T's proposal clearly meets these requirements.

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?

Q. WHAT DO THE FCC REGULATIONS PROVIDE ABOUT CLEC SWITCHES AND TANDEM RATES?

A. The FCC recognizes that there is parity between a competitive carrier's end office switch and an ILEC tandem switch. The FCC regulations, 47 C.F.R. § 51.711 (a)(3), provide:

> Where 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.

Q. HAS THE FCC PROVIDED ANY ADDITIONAL GUIDANCE REGARDING THE ESTABLISHMENT OF TRANSPORT AND TERMINATION RATES?

A. Yes, it has. In the Local Competition Order, the FCC stated:

> We find that the "additional costs" incurred by a LEC when transporting and terminating a call that originated on a competing carrier's network are likely to vary depending on whether tandem switching is involved. We, therefore, conclude that states may establish transport and termination rates in the arbitration process that vary according to whether the traffic is routed through a tandem switch or

> directly to the end-office switch. In such event, states shall also consider whether new technologies (*e.g.*, fiber ring or wireless networks) perform 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. Where 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.[16]

Q. DO AT&T'S SWITCHES IN TENNESSEE COVER A GEOGRAPHIC AREA COMPARABLE TO THE AREA COVERED BY BELLSOUTH SWITCHES?

A. Yes. AT&T offers local exchange service in Tennessee via 4ESS switches, which function primarily as long distance switches, and 5ESS switches, which act as adjuncts to the 4ESS switches. AT&T has the ability to connect virtually any qualifying local exchange customer in Tennessee to one of these switches through AT&T's dedicated access services.

AT&T requests that the Authority order BellSouth to pay AT&T BellSouth's tandem interconnection rate for the termination of local traffic at any AT&T switch. AT&T is justified in its request because the geographic area covered by each of its switches is comparable to the area covered by BellSouth's tandem switches.

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[16] FCC Local Competition Order at ¶ 1090 (emphasis added).

Q. HAVE YOU PREPARED ANY MATERIALS THAT WILL ASSIST THE AUTHORITY IN DETERMINING THE GEOGRAPHIC COVERAGE OF AT&T'S SWITCHES SERVING TENNESSEE?

A. To assist the Authority in understanding this issue, I have prepared three maps that are marked as Exhibit GRF-6. Exhibit GRF-6 contains both color transparency maps and color copies of the same maps. The transparent maps are supplied so that the reader can "overlay" the maps and compare the geographic area served by AT&T switches and BellSouth switches.

Exhibit GRF-6a and GRF-6b[17] provide the number of switches AT&T and TCG currently operate in Tennessee on a LATA by LATA basis. It is important to note that in some cases, the AT&T switch serving a LATA is not physically located in the LATA.

Exhibit GRF-6c[18] shows the number of tandem switches BellSouth currently operates in Tennessee on a LATA by LATA basis. When GRF 6a and 6b are superimposed over each other, it becomes clear that both AT&T's switches cover the same (or a comparable) geographic area as that covered by BellSouth's tandem switches.[19]

Q. WHAT ABOUT THE FUNCTIONALITY OF THE SWITCHES?

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[17] On the AT&T maps, green shading depicts the areas covered by AT&T's switches.

[18] On the BellSouth maps, various color shading depicts areas covered by BellSouth's tandems.

[19] Statewide and LATA-specific maps were created by using data contained in the Local Exchange Routing Guide (LERG). The LERG, produced by Telcordia Technologies, contains routing data that supports the current local exchange network configuration within the North American Numbering Plan (NANP) as well as identifying reported planned changes in the network. The LERG data in

A. The relevant FCC rule does not focus on tandem functionality[20] for purposes of determining whether a CLEC meets the requirements under 47 C.F.R. § 51.711(a)(3). However, each AT&T switch performs certain tandem functions for the respective AT&T entity. First, each of these switches acts as an access tandem routing the preponderance of interLATA traffic directly to the applicable interexchange carrier. Second, with respect to traffic between any AT&T customer and any BellSouth customer within the same LATA, AT&T has direct trunking to each BellSouth tandem in the LATA so that such traffic may be completed without transiting multiple AT&T switches or multiple BellSouth tandems. In other words, AT&T uses its switches in the same functional manner that BellSouth uses its tandem switches.

Q. DO AT&T'S SWITCHES PROVIDE TANDEM FUNCTIONALITIES IN THE MANNER DESCRIBED IN THE FCC'S DISCUSSION IN THE LOCAL COMPETITION ORDER?

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conjunction with MapInfo V-4.1.1.2, a commercial mapping software package, was used to prepare the statewide and LATA-specific maps attached herein.

[20] The primary function of a tandem is the aggregation of traffic between customers calling outside their immediate exchange. As described in the preceding discussion of network architecture, the BellSouth network is comprised of a large number of end offices each serving a relatively small area. Rather than connect every end office to every other end office, BellSouth routes certain traffic to tandem switches which serve groups of end offices. Thus, a call from a BellSouth customer to someone in another rate center often will travel to a tandem switch, which has a connection to the end office switch serving the called customer. Under the BellSouth network architecture, the tandem switches aggregate traffic to be sent to other switches. Under AT&T's network architecture, AT&T's switches also perform a substantial amount of traffic aggregation and, therefore, are performing the primary function of a tandem switch.

A. As the foregoing description indicates, AT&T's switches do indeed perform both end office and tandem switch functions. Tandem switches generally aggregate traffic from a number of end office switches for purposes of passing that traffic to other offices for termination elsewhere on the network. The tandem switch is also used for aggregation and processing of operator services traffic, routing traffic that is to be transferred between the trunk groups of two separate carriers, and measuring and recording traffic detail for billing. While BellSouth employs two separate switches to accomplish these tandem and end office functions; as I have shown above, AT&T's switches perform all of these functions within the same switch.

Thus, AT&T not only has met the geographic requirements of 47 C.F.R. §51.711(a)(3), but also meets a higher standard by virtue of its substantial investments in physical plant and deployment of an architecture comprised of network components comparable to BellSouth. The Authority should, therefore, conclude that AT&T should receive the tandem interconnection rate as BellSouth's reciprocal compensation for the termination of its local calls by AT&T.

ISSUE 9: WHAT IS THE APPROPRIATE TREATMENT OF OUTBOUND VOICE CALLS OVER "INTERNET PROTOCOL ("IP") TELEPHONY?

Q. WHAT IS VOICE OVER INTERNET PROTOCOL?

A. The FCC has described IP Telephony or VOIP as "services that enable real-time voice transmission using Internet protocols." The FCC has observed that the service can be provided through "gateways" that enable applications originating and/or terminating on the public switched telecommunications network. The gateways are computers that transform the circuit-switched voice signal into Internet Protocol packets and vice versa, and perform associated signaling, control and address translation functions. (Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report to Congress, FCC 98-67, ¶ 84 (rel. April 10, 1998) ("Report to Congress").

The phrase "Voice over Internet Protocol" can encompass a wide variety of services. For instance, a voice call using Internet Protocol could be phone-to-phone, computer-to-phone, phone-to-computer, or computer-to-computer. In some cases it could be a voice call delivered to a World Wide Web address. In other cases it could be a voice call delivered to a North American Numbering Plan number or to an Internet Protocol address not on the World Wide Web.

Q. DESCRIBE THE ISSUE THAT BELLSOUTH HAS RAISED CONCERNING INTERNET PROTOCOL TELEPHONY?

A. BellSouth proposed the following language to AT&T during negotiations to address this issue:

> The origination and end point of the call shall determine the jurisdiction of the call, regardless of transport protocol

> method. Unless expressly agreed to by the Parties in this Agreement, neither Party shall represent as Local Traffic any traffic for which access charges may be lawfully assessed. The Parties have been unable to agree as to whether "Voice-over Internet Protocol" transmissions ("VOIP") that cross LATA boundaries constitute Switched Access Traffic. Notwithstanding the foregoing, and without waiving any rights with respect to either Party's position as to the jurisdictional nature of VOIP, the Parties agree to abide by any effective and applicable FCC rules and orders regarding the nature of such traffic and the compensation payable by the Parties for such traffic, if any. Until such time as there is an effective and applicable FCC Rule or Order, VOIP traffic which crosses LATA boundaries will be considered switched access traffic.

Under BellSouth's proposal, any type of call (phone-to-phone, computer-to computer, phone to computer, computer-to-phone) that makes use of Internet Protocol technology in handling the voice call, would be subject to switched access charges if the call crosses LATA boundaries.

Q. WHICH TYPE OF CALL IS BELLSOUTH ADDRESSING?

A. BellSouth has indicated in testimony in other states that it is only addressing phone-to-phone Voice over Internet Protocol calls. However, as previously noted, its proposed language makes no such delineation.

Q. DOES AT&T AGREE WITH BELLSOUTH THAT SWITCHED ACCESS CHARGES SHOULD APPLY AT LEAST TO PHONE-TO-PHONE INTERNET PROTOCOL TELEPHONY?

A. No. AT&T's position is that Internet Protocol telephony, including phone-to-phone Internet Protocol telephony, should not be subject to switched access charges.

Q. WHY IS BELLSOUTH'S PROPOSAL INAPPROPRIATE FOR THE REGULATION OF INTERNET PROTOCOL TELEPHONY?

A. BellSouth's claim that Internet Protocol telephony or VOIP is simply "plain old telephone service" that should be subject to payment of switched access charges is a continuation of a monopoly trying to hold on to its monopoly service. IP telephony is in its infancy. There is no need for, and this Authority should not, stifle its innovation by imposing burdensome regulatory rules that in fact may not even work. The nature of Internet Protocol could make enforcement of traditional regulatory classification next to impossible. While BellSouth argues that there is no service distinction involved between Internet Protocol and circuit-switched networks, Internet Protocol technology blurs traditional distinctions between local and long distance service and between voice, fax, data, and video services, thereby making "one-size fits all regulation" a difficult proposition. The fundamental design of Internet Protocol networks converts all forms of information into indistinguishable packets of digital bits. Packets are routed through networks based on a non-geographical, non-hierarchical addressing scheme that allows packets to follow several possible routes between network nodes. At any

given node, it is impossible to determine the geographic origin of an incoming packet, or its destination.

Q. HAS THE FCC ADDRESSED THE ISSUE OF REGULATING PHONE-TO-PHONE INTERNET PROTOCOL TELEPHONY?

A. Yes. On several occasions over the last two years, the FCC has taken the position that phone-to-phone Internet Protocol telephony voice calls are <u>not</u> traditional telecommunications services and should not be treated as such. Specifically, the FCC has not ruled that switched access charges are applicable to such calls. In its Report to Congress issued April 10, 1998, the FCC declined to classify phone-to-phone IP telephony as a telecommunications service. Report to Congress, ¶ 90. In April 1999, the FCC declined to act on US WEST's petition asking the FCC to declare phone-to-phone Internet Protocol telephony a telecommunications service.

Q. HAS THE FCC ISSUED ANY POLICY STATEMENTS ABOUT THE TREATMENT OF INTERNET PROTOCOL TELEPHONY?

A. Yes. The Chairman of the FCC has stated that he "does not want to impose 'legacy' telephone regulations on any part of the Internet, including Internet telephony." He further stated:

> [I]t's important to recognize that legacy regulation is not necessarily appropriate to emerging network technologies,

> so when people start asking 'when are you going to regulate IP telephony,' my answer is always the same – never.[21]

The Chairman reiterated this position in a speech delivered on September 12, 2000. FCC Chairman Kennard urged regulators to decline imposing existing regulatory schemes on new technologies:

> [D]uring this transition, the answer is not to saddle nascent technology with the increasingly obsolete legacy regulations of he past. Their architectures fundamentally differ, and so should their rules. In short, one-size regulation does not fit all. It just doesn't make sense to apply hundred-year old regulations meant for copper wires and giant switching stations to their IP networks of today. And I oppose any plan to levy any new fees or taxes on IP telephony.[22]

Chairman Kennard's statements not only support the conclusion that the FCC has not found IP telephony to be the same as switched access traffic, but they further indicate that the FCC believes there is good reason to reject labeling this technological development by reference to older categories of service. Accordingly, although Internet Protocol telephony provides voice calling capability, BellSouth's argument that "if it looks like a duck, it must be a duck" and similar comparisons should not be accepted as justification for classifying new services as telecommunications services subject to applicable regulation.

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[21] *Kennard Pledges No Regulation for Internet Telephony*, WARREN'S WASHINGTON INTERNET DAILY, Vol. 1, No. 3, May 25, 2000, at 1.

[22] Remarks by FCC Chairman Kennard before the Voice Over Net Conference, Atlanta, Georgia, September 12, 2000.

Q. WHAT DOES AT&T PROPOSE THIS AUTHORITY DO?

A. AT&T recommends that the Authority find that Internet Protocol telephony is not subject to switched access charges, and that BellSouth's proposed language be rejected.

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?

Q. DESCRIBE THE UNRESOLVED ISSUE PERTAINING TO USE OF LOCAL SWITCHING IN PROVIDING EXCHANGE AND EXCHANGE ACCESS SERVICE TO CUSTOMERS?

A. As a result of the Supreme Court's decision in AT&T Corp. v. Iowa Board of Utilities, 525 U.S. 366 (1999), the issue of network elements was remanded to the FCC with instructions to review its decision on what network elements must be provided by ILECs. As part of this remand, the FCC determined that ILECs need not provide a CLEC with local circuit switching capability where the CLEC intends to serve customers who have four or more voice grade (DS0) equivalents or lines and, (i) the affected local circuit switches are located in one of the top 50 Metropolitan Statistical Areas (MSAs) in density zone 1, and (ii) the incumbent LEC provides access to combinations of unbundled loops and transports throughout density zone 1, as defined as of

January 1, 1999. BellSouth and AT&T have been unable to agree on BellSouth's responsibility to provide local circuit switching for AT&T customers who have separate locations with no more than three (3) lines at each location.

Q. WHAT IS A LOCAL CIRCUIT SWITCH?

A. A local circuit switch is the type of switch deployed by telecommunications carriers to provide dial tone to a customer so the customer can receive local service.

Q. WHAT IS A METROPOLITAN STATISTICAL AREA?

A. This is a geographic area within a state as defined by the United States Government Office of Management and Budget. MSAs are often used to administer federal programs. Presently, there are 258 MSAs in the United States. In Tennessee, the only MSA affected by the FCC rules is the Nashville MSA.

Q. WHAT LIMITATION IS BELLSOUTH PROPOSING ON THE USE OF LOOP/SWITCH COMBINATIONS TO SERVE CUSTOMERS IN THE TENNESSEE MSAS?

A. BellSouth is proposing the following limitation on the use of loop/switch combinations in the Nashville:

- If a customer has multiple locations throughout the MSA, receives one bill from BellSouth for all lines, and the total number of lines from all locations is more than three, none of the lines at any location could be served using the loop/switch combination at cost-based UNE rates.

Q. DOES AT&T AGREE WITH THIS RESTRICTION?

A. No. BellSouth's interpretation of the FCC's rule is unreasonable. Furthermore, BellSouth's proposed restriction impedes competition. Additionally, some customers may actually want to have some lines served by one carrier and some lines served by another. This option of choice of carriers allows the customer to take advantage of service offerings from various companies and protect their business/home telephone service from disruption if there is a problem with one company.

Q. IN THE FCC'S UNE REMAND ORDER, THE FCC DECIDED THAT AN ILEC COULD CEASE PROVIDING LOCAL CIRCUIT SWITCHING AT COST-BASED RATES IF THE ILEC PROVIDES ACCESS TO ENHANCED EXTENDED LINKS THROUGHOUT THE MSA. WHY ISN'T THE USE OF SUCH COMBINATIONS OF NETWORK ELEMENTS PRACTICAL TO SERVE A CUSTOMER IN THIS SITUATION?

A. The use of an enhanced extended link makes sense if the customer has more than two lines at one location. In its Remand Order, the FCC used four lines

as the economic cut-off between using individual lines and high capacity trunks such as a DS1. AT&T has requested that the FCC reconsider four as the appropriate cut-off, but for purposes of this arbitration AT&T is agreeing to the four line limitation. Clearly, less than four lines is not the appropriate number of lines a customer would use to make a decision as to whether to buy, for instance, flat rated business service versus PBX service.

Furthermore, BellSouth is proposing that even though no one customer physical location has more than three lines, if a customer receives one bill from BellSouth or AT&T that aggregates service across the MSA and the total number of lines on the bill from multiple locations exceeds three, then all lines could not be served by use of a loop/port combination at cost-based rates.

Q. WHAT IS AT&T ASKING THE TRA DO?

A. AT&T is asking that the TRA order that any local line limitation that applies to the use of local switching in Nashville apply to each physical location where AT&T orders local switching from BellSouth, and not to a specific customer with multiple locations on the same bill.

ISSUE 16: SHOULD THE AUTHORITY OR A THIRD PARTY COMMERCIAL ARBITRATOR RESOLVE DISPUTES UNDER THE INTERCONNECTION AGREEMENT?

Q. EXPLAIN THE ISSUE CONCERNING ALTERNATIVE DISPUTE RESOLUTION?

A. BellSouth proposes to eliminate the ability for either party to make use of a third party arbitrator in order to settle disputes arising from interpreting or implementing the new interconnection agreement.

Q. WHAT IS AT&T'S PROPOSAL?

A. AT&T had originally proposed the use of third party arbitrators as the preferred means for dispute resolution. Recently AT&T proposed language to BellSouth that would allow the dispute to go to the Authority if both parties agree and also request the Authority to hear the dispute on an expedited schedule. Alternatively, AT&T's language proposes that the dispute can go to the alternative dispute resolution process if both parties agree. If there is not agreement among the parties, then the aggrieved party can choose the method of resolution. BellSouth has indicated, however, that AT&T's proposed language is still unacceptable, and still prefers to have this Authority resolve all disputes arising from a disagreement on what the interconnection agreement requires. AT&T's proposed language states, in part:

> Upon agreement of both parties, disputes arising out of this Agreement will be submitted to the TRA and both parties will request the TRA to resolve the dispute on an expedited schedule. An expedited scheduled request would require the TRA to hear the Complaint within 60 days of filing. In the alternative and upon the agreement of both parties, disputes arising under this contract may be resolved through a dispute resolution process as outlined below. If there is no agreement

between the parties regarding an expedited schedule for disputes submitted to the TRA or for the dispute to be resolved through the dispute resolution process, then the aggrieved party may choose the method of resolution.

Q WHAT IS THE PURPOSE OF AT&T'S PROPOSAL?

A. The purpose of AT&T's proposed language is the expeditious resolution of disputes. If a dispute can be resolved more quickly through the alternative dispute resolution process, then AT&T would prefer the use of that method of resolution. On the other hand, if a dispute can be resolved more quickly through the Authority, then AT&T would want the Authority to hear the dispute. In fact, as I have similarly testified in the arbitration proceedings in both Georgia and North Carolina, if this Authority had rules established for hearing cases on a expedited basis, or a "rocket docket", then AT&T would agree to BellSouth's proposal to take all disputes to the Authority.

Q. WHY SHOULD THE AUTHORITY ADOPT AT&T'S, AS OPPOSED TO BELLSOUTH'S PROPOSAL?

AT&T's proposal is a more reasonable and realistic approach to dispute resolution. It allows both parties a vote in whether the dispute goes to alternative dispute resolution or to the Authority. If one party votes for the dispute to go to the Authority and the other for alternative dispute resolution, then the aggrieved party can choose. AT&T's proposal also allows for the quickest resolution of the dispute. Often, service affecting disputes arise under these interconnection agreements that require immediate resolution. In

such circumstances, it may not be feasible to take the dispute to the Authority if the Authority has a full calendar and would be unable to have a hearing for nine to twelve months. Accordingly, BellSouth's proposal that all disputes go to the Authority results in too much uncertainty as to when a final decision would be reached on any given dispute.

Q. WHAT DOES AT&T PROPOSE THIS AUTHORITY DO?

A. AT&T requests that this Authority adopt AT&T's language allowing the parties an option of submitting disputes arising under the interconnection agreement to the Authority or to an alternative dispute resolution process.

Q. DOES THAT CONCLUDE YOUR TESTIMONY?

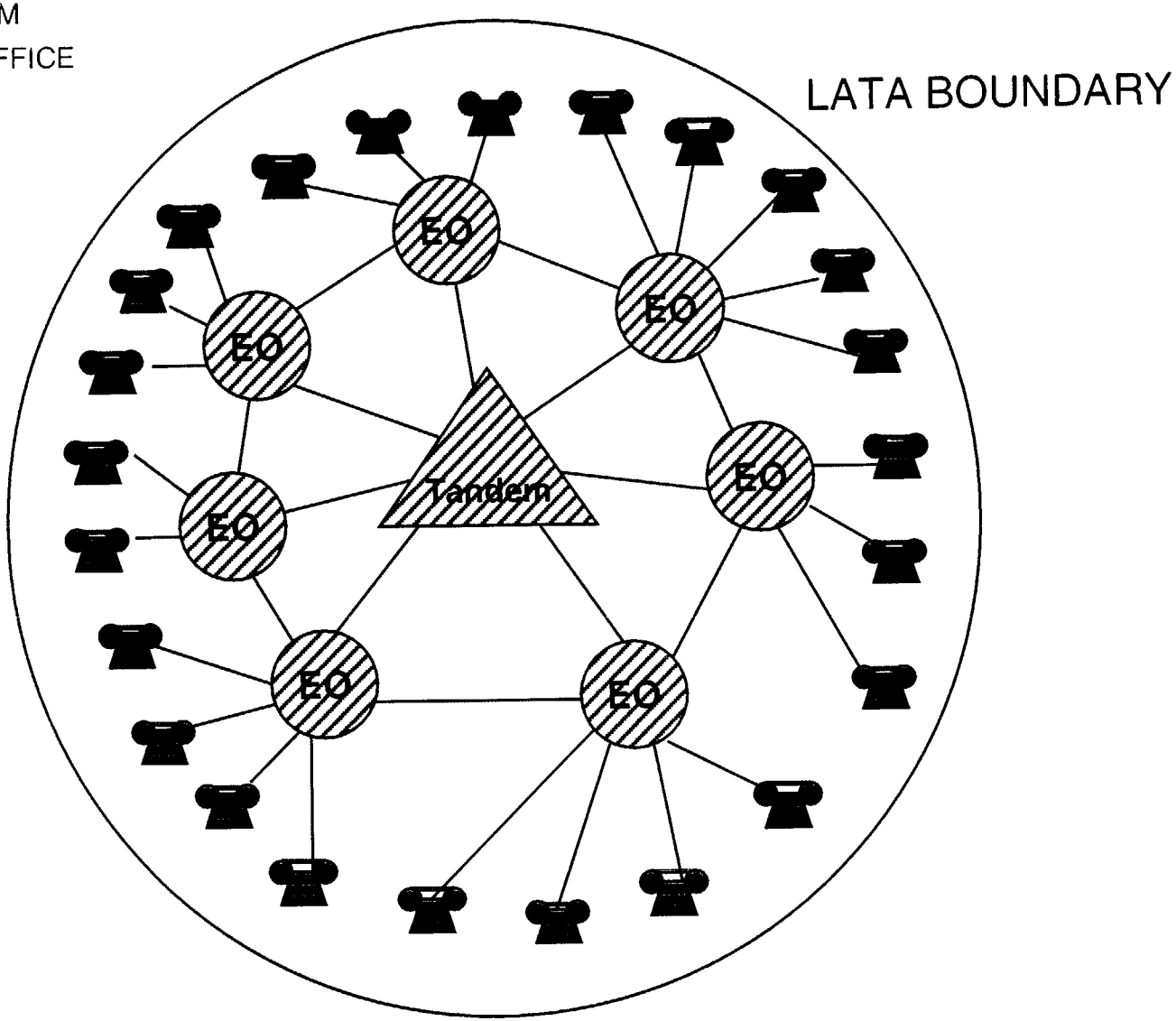
A. Yes.

ATTACHMENT 1 - BST NETWORK ARCHITECTURE

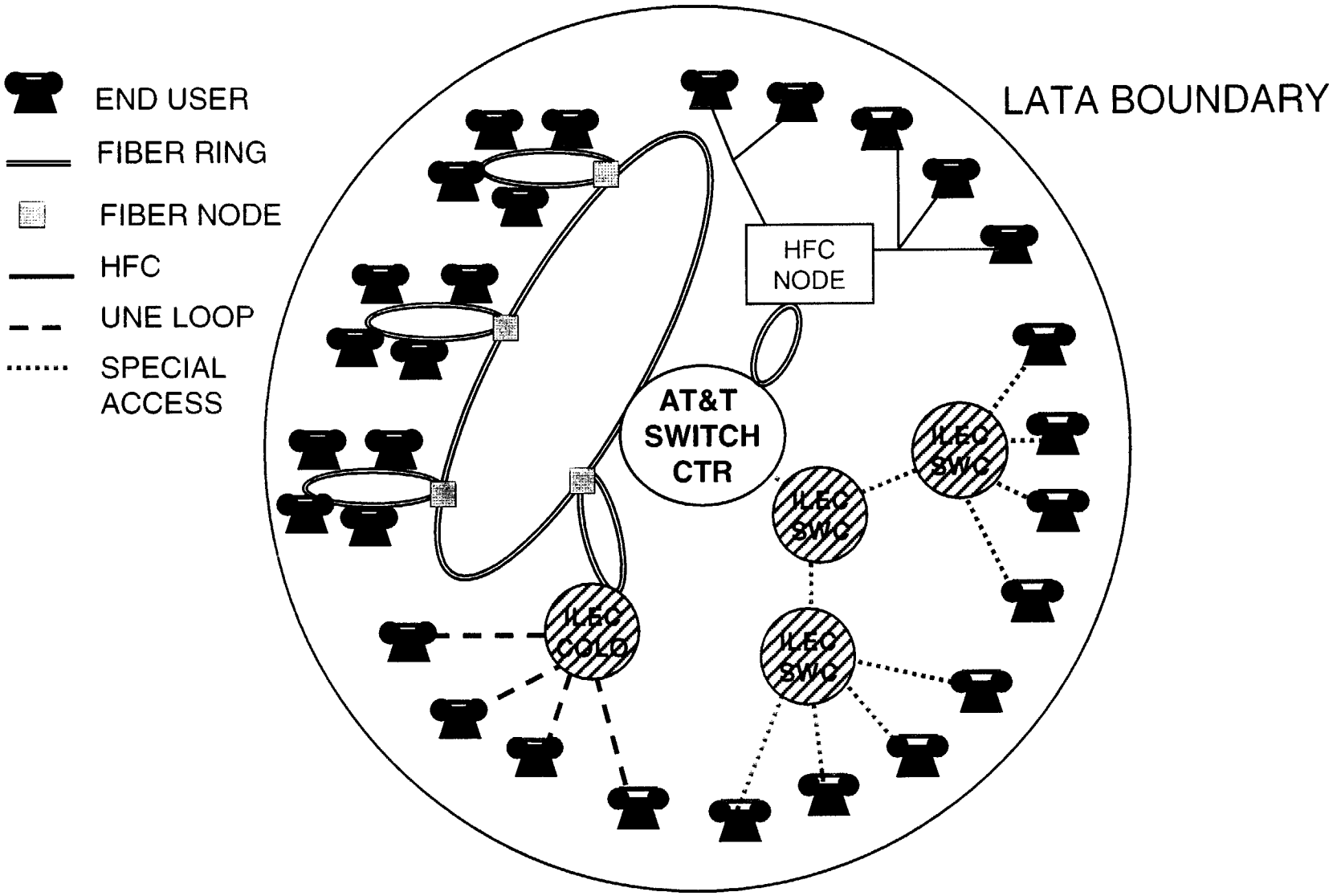
= BST TANDEM

= BST END OFFICE

= END USER

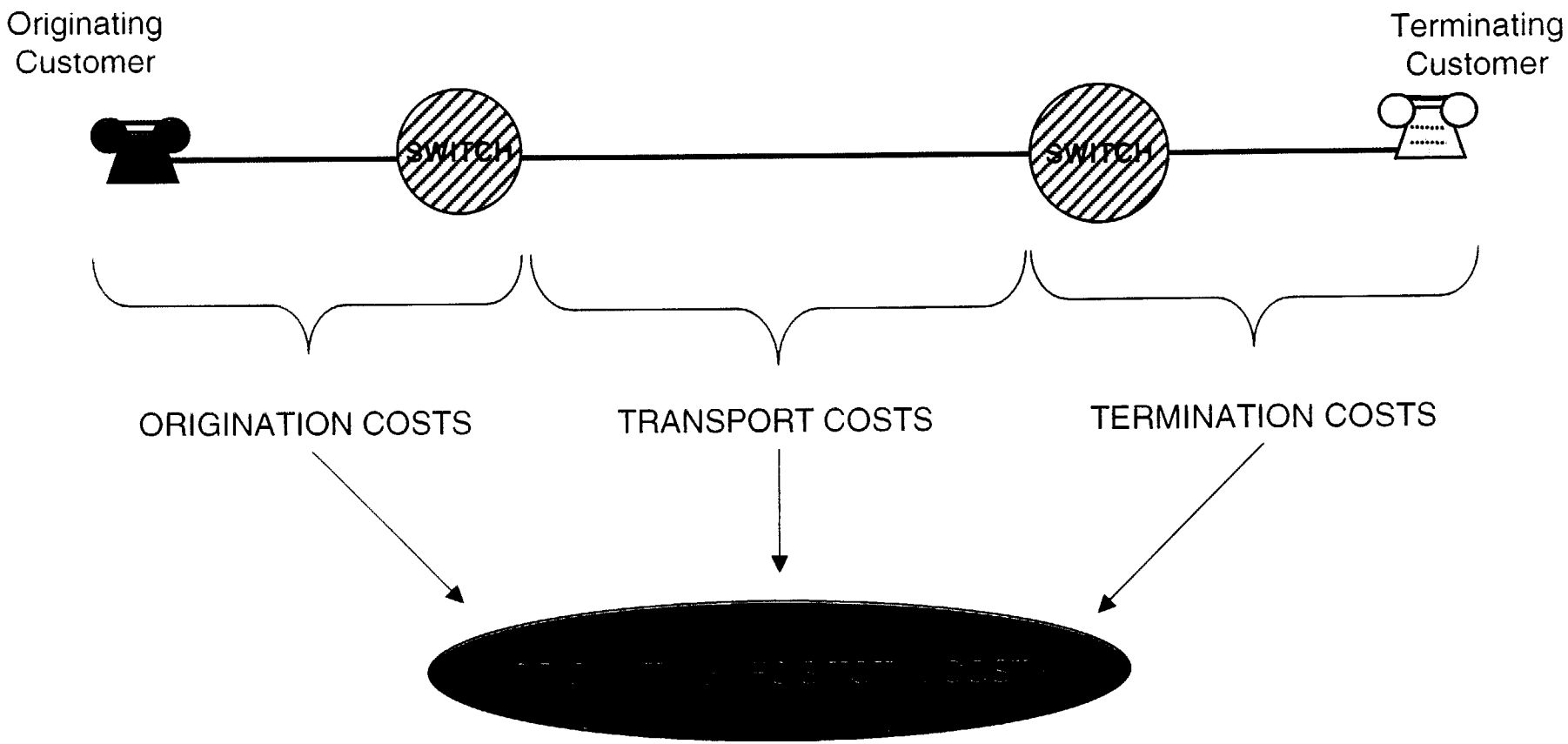


ATTACHMENT 2 - AT&T NETWORK ARCHITECTURE

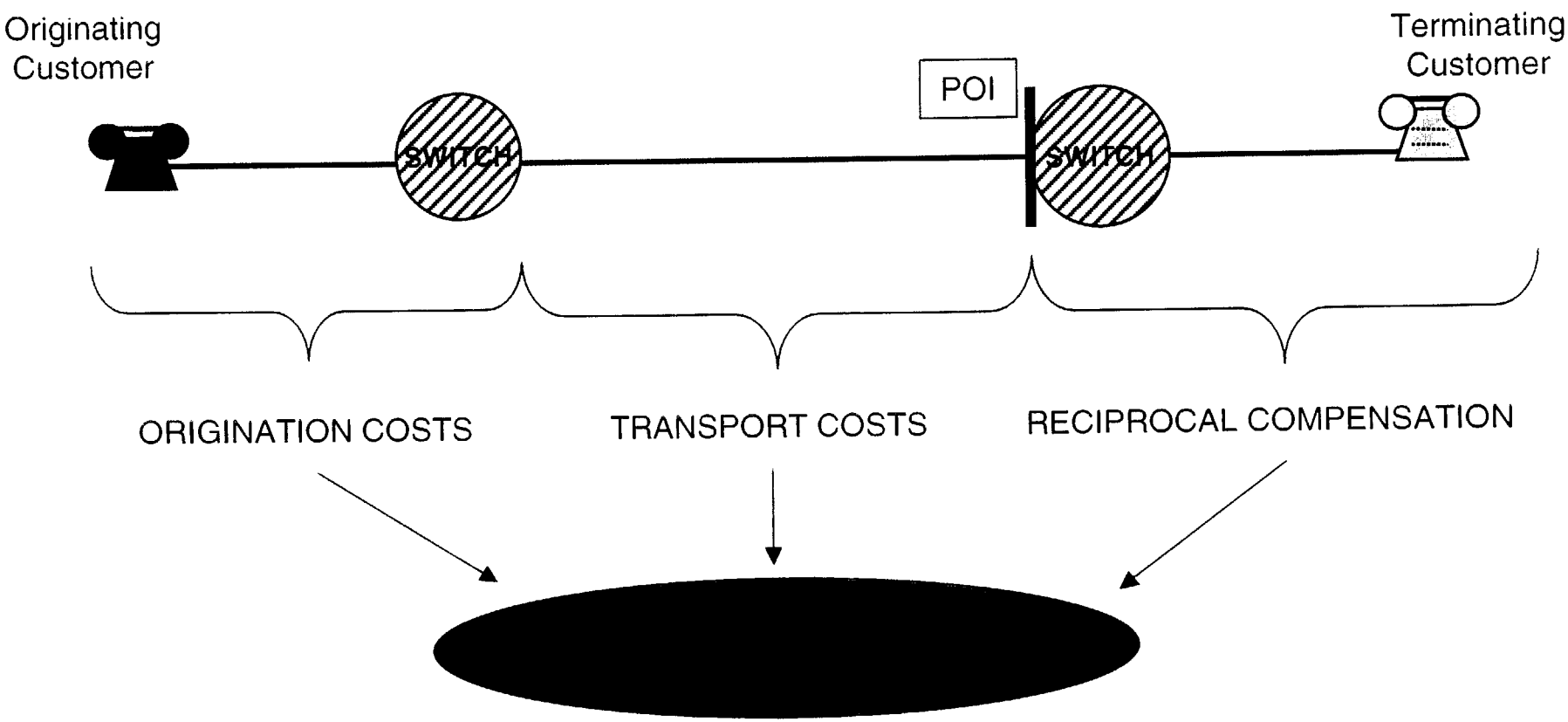


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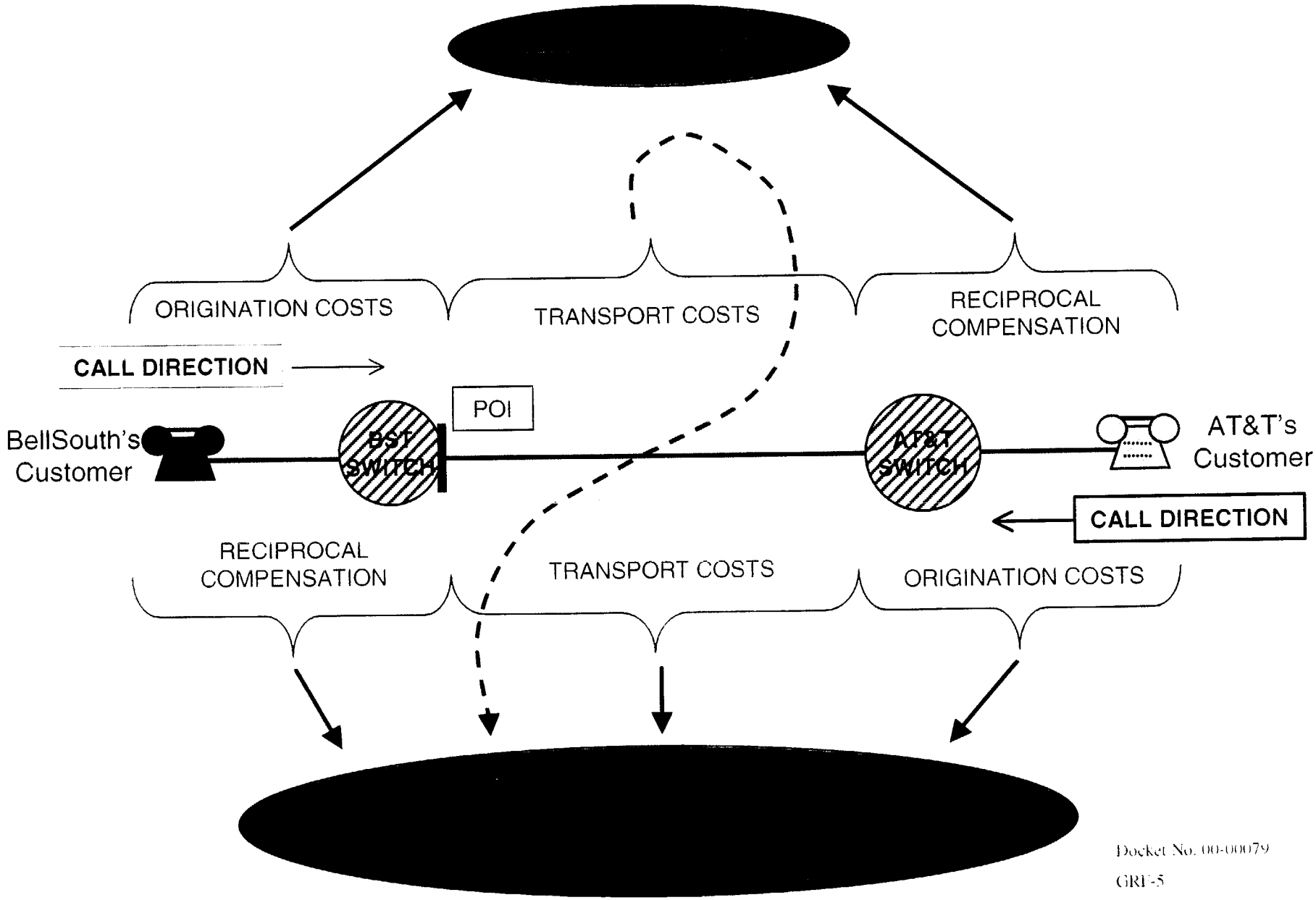
ATTACHMENT 3 - PRE-TRA COST MODEL



ATTACHMENT 4 - TRA COST MODEL AND AT&T PROPOSAL

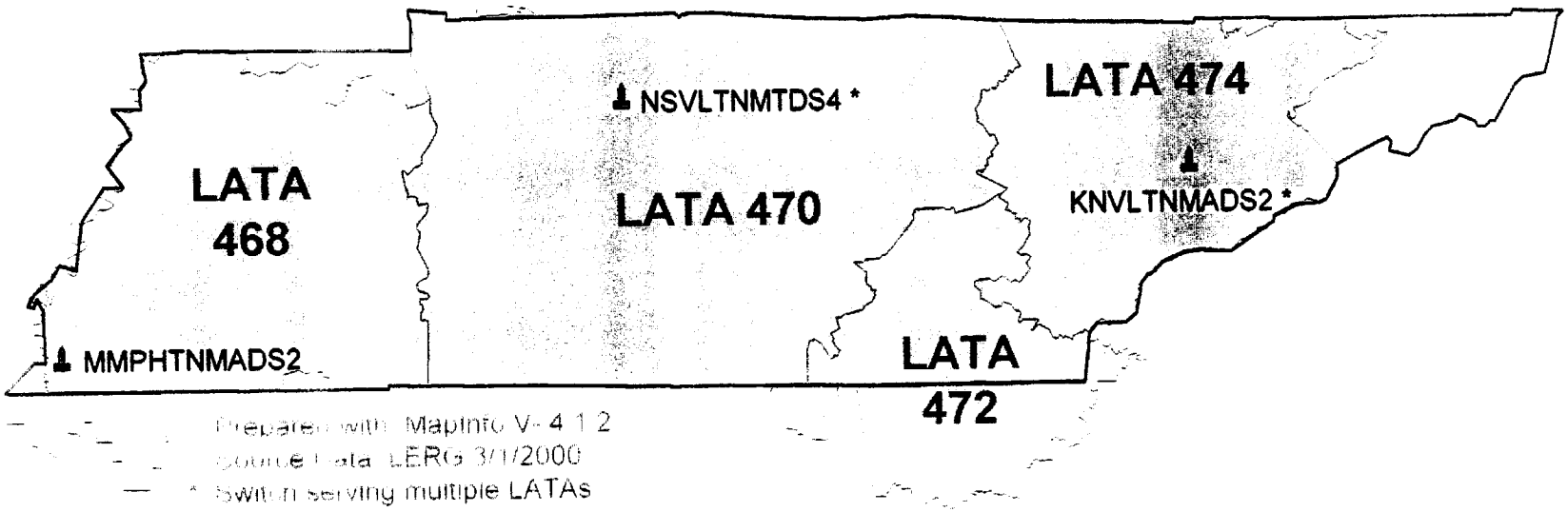


ATTACHMENT 5 - BELLSOUTH PROPOSAL



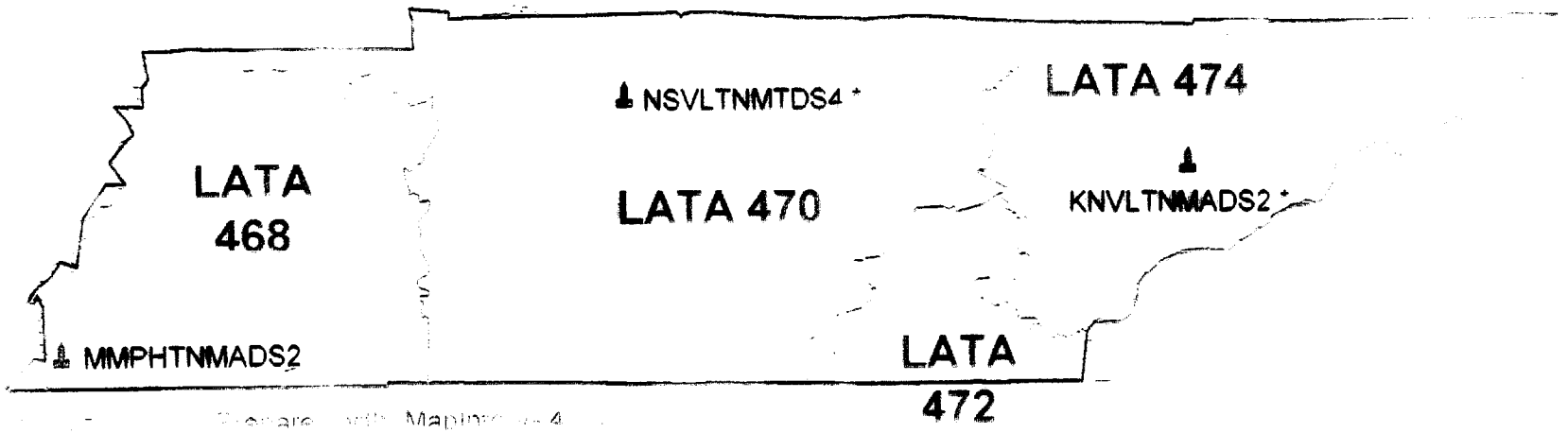
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AT&T 4ESS Serving Tennessee



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AT&T 4ESS Serving Tennessee



Prepared with MapInfo v. 4
... are LEPs as of 2000
... switches serving multiple LATAs
... location on this scale
... areas served by AT&T

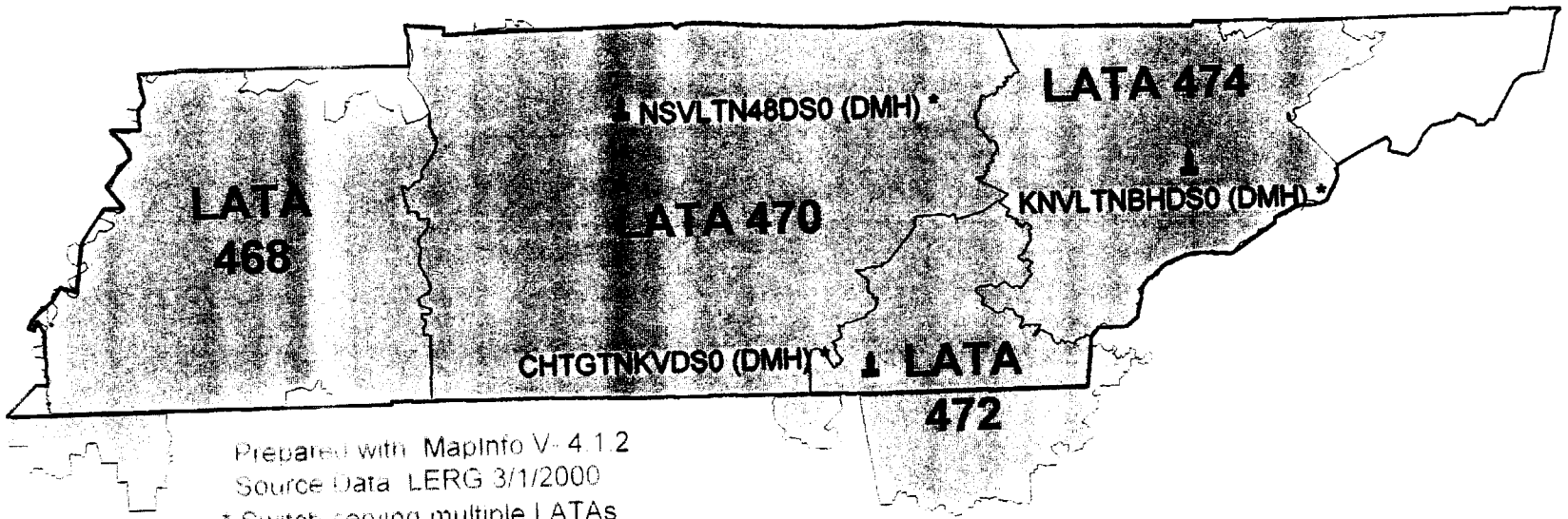
BellSouth Tandems Serving Tennessee



Prepared with MapInfo V- 4.1.2
Source Data: LERG 3/1/2000
* Switch serving multiple LATAs
# Switch location not to scale

TRA Docket No. 00-00079
GRF-6b

TCG Switches Serving Tennessee



Prepared with MapInfo V- 4 1.2
Source Data LERG 3/1/2000
* Switch serving multiple LATAs
# Switch location not to scale
Geographic area's served by TCG

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GRF-6c
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BEFORE THE TENNESSEE REGULATORY AUTHORITY

DIRECT TESTIMONY OF RONALD W. MILLS

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 00-00079

DECEMBER 20, 2000

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Ronald Mills. My business address is 1200 Peachtree Street, NE, Atlanta, Georgia 30309.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by AT&T Corp. ("AT&T") as a District Manager within the Law and Government Affairs organization. In this capacity, I provide support to AT&T business units on technical issues related to network matters and their relationship to the Federal Communications Commission and state public utility commission orders. My current involvement supports the identification and resolution of physical interconnection issues such as hot cut loop provisioning and collocation issues with BellSouth as well as other issues as they arise in interconnection negotiations.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A. I hold a BA in Human Resource Administration from St. Leo College, a Masters in Technology Management from the Georgia Institute of Technology and a Master's Certificate in Commercial Project Management from George Washington University. I also hold certifications as an electrician and project manager. I have worked for AT&T for the past 26 years. My AT&T job experience includes assignments in Network Operations Central Offices, Data Processing, Marketing, Engineering, and Environment, Health and Safety.

In Network Operations, I was responsible for maintaining, testing, and repairing private line and switched telephone equipment. As a Data Processing Associate, I was responsible for managing batch and on-line systems data processing programs for the Atlanta Corporate data center. I performed duties as a troubleshooter to identify and repair hardware and software errors. My data processing specialty was Job Control Language debugging.

As a Marketing Administrator, I assisted various National Account teams with technical support for customer presentations and service analysis. I also provided National Account Team technical support for voice products, sales and services.

Within AT&T engineering, I have held several assignments. I successfully transitioned the BellSouth Message TIRKS database to AT&T's

Toll Connect Engineering. Later, I developed and wrote start-up methods and procedures for the Atlanta Toll Connect group.

I served as National Account Engineering Manager for the Federal Express National Account. I was also responsible for coordination of all projects (Voice/Data). While performing as a Customer Service Engineer – Switched Services Coordination, I coordinated the implementation of private switched networks, working closely with the Local Exchange Companies.

Then, I served as Service Node Engineer, where I managed three regions (eighteen states) to provide Nodal and Hybrid services via T1.5 services and access. I was a Project Manager and provided subject matter expertise for planning, coordination, and implementing projects that added capacity or features to the AT&T World Wide Intelligent Network.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. In my testimony, I address the following issues:

- The enhancements AT&T proposes for the coordinated cut-over process to be followed when a customer changes local service providers from BellSouth to AT&T and uses BellSouth's local loop to provision that service (Issue 8);
- The appropriate intervals to be used by BellSouth when delivering collocation space as requested by AT&T (Issue 11);
- The appropriate requirements when AT&T and BellSouth have telecommunication equipment in the same building and AT&T

requests connections to either BellSouth's or another CLEC's collocated space in BellSouth's portion of the building (Issue 12); and

- Whether the criminal background check requirement that BellSouth seeks to impose on AT&T's employees or agents seeking access to collocated space in BellSouth premises is appropriate (Issue 13).

I. HOT CUTS – Issue 8

Q. EXPLAIN THE ISSUES CONCERNING COORDINATED CUT-OVERS OF LOCAL LOOPS.

A. BellSouth's process to coordinate the transfer of local service from itself to AT&T when AT&T is using BellSouth's local loops is inadequate. Unless BellSouth's process is modified, it will result in continued customer frustration and an increase in the number of missed appointments by BellSouth. The current process, if not improved, will have a detrimental impact on AT&T's ability to attract and serve local customers in Tennessee.

Q. WHAT IS A COORDINATED CONVERSION OR A "HOT CUT"?

A. Coordinated conversion ("hot cut") loop provisioning is the coordinated transfer of an unbundled loop from BellSouth to a CLEC, along with the porting of the customer's existing telephone number so the customer can retain the existing telephone number when obtaining service from the CLEC. The hot cut process involves two separate changes on a customer's loop that must be made at approximately the same time: (1) the manual transfer of the customer's loop such that it terminates on the CLEC's switch rather than at BellSouth's switch (the loop cut); and (2) the software changes that permit the

appropriate routing of inbound calls to the end user based upon the end user's existing telephone number and the disconnection of the BellSouth switch translations (the porting of the telephone number).

Q. HOW CAN THE HOT CUT PROCESS BE BEST UNDERSTOOD?

A. Attached to my testimony as Exhibit RWM-1 is a videotape, which was prepared under my direction. The video illustrates the hot cut process and identifies the many precautions that AT&T takes to ensure that there is a seamless, accurate, and reliable transition for the AT&T customer when changing to a new local service provider.[1] The video depicts the actual steps used in AT&T's provisioning center to process a customer's request to change local telephone companies.

I will also briefly describe the process in my testimony. The customer's order to change service from BellSouth to AT&T begins when an order is received by AT&T's sales force. At AT&T's centers, the order goes through AT&T's eight-step process. The steps of this process are:

- Pre-Design
- Design
- Local Exchange Contact
- Customer Contact
- Number Portability

[1] The video includes the simulation of a technician physically changing the loop from the Incumbent Local Exchange Carrier ("ILEC") to the new local service provider. We have simulated this step because a BellSouth technician in a BellSouth central office performs the actual work of physically connecting the customer's loop to AT&T's central office switch.

- Testing
- The Hot Cut
- Quality Assurance

1. In the Pre-Design step, AT&T accesses BellSouth's pre-ordering OSS to obtain customer information such as name, address and telephone number. This information is entered into the AT&T systems so the information on AT&T's order matches BellSouth's customer service record.
2. In the Design step, AT&T must specify which equipment in AT&T's switch and in AT&T's collocation space will be assigned to the new customer. As part of this step, AT&T identifies the Connecting Facility Assignment ("CFA").
3. The Local Exchange Contact step involves AT&T's preparation of the Local Service Request ("LSR") for electronic submission to BellSouth's interface. Under the current process BellSouth validates that the order is error free, and, if all of the fields are correctly populated, BellSouth sends AT&T a Firm Order Confirmation ("FOC"). AT&T is requesting that BellSouth perform a facility check of its database before issuing the FOC, so the FOC due date and time will be a commitment upon which AT&T and its customers can rely.
4. The Customer Contact step involves a second review of the customer's order in AT&T's systems. Based on the information

returned on the FOC, AT&T notifies the customer when the hot cut is scheduled to take place.

5. The Number Portability step requires the National Number Portability Administrator to be notified that reprogramming is needed for the customer's telephone number. This is done by sending a "create" message to the administrator for later activation.

6. During the testing stage, BellSouth determines that the connecting facilities are ready by checking to see if dial tone and Automatic Numbering Identification ("ANI") are present. Under the current process, BellSouth notifies AT&T of the test results anytime from 48 hours in advance to immediately prior to the cut. AT&T is requesting that BellSouth be required to notify AT&T 48 hours in advance whether the hot cut will proceed on schedule so AT&T can assist with any problems and keep the customer informed.

7. After the testing is completed, the physical connection part of the hot cut process is performed and, under the current process, BellSouth finally commits to the date and time. It is at this point that the loop connected to BellSouth's switch is disconnected and the cross-connect to AT&T's equipment in AT&T's collocation space is connected (the loop cut). AT&T is requesting that BellSouth be required to notify AT&T when the physical connection is complete according to the agreed-upon process. AT&T is also requesting that

BellSouth be required not to impose upon AT&T any non-recurring time-specific charges for missed appointments.

8. Quality Assurance restores full service to the customers. At this point, AT&T ensures that all the lines and features have been successfully ported and accepts the service from BellSouth. BellSouth closes the process by sending an "unlock " message to the National Portability Administration Center (NPAC) and stops the billing. The customer can now make and receive calls as an AT&T customer.

Q. WHY IS THE PROCESS CALLED A HOT CUT?

A. The process is called a "hot cut" because, at the time of the transfer, the customer's loop is in active service (i.e., the loop is "hot"), and the customer's loop is cut resulting in a temporary loss of active service. If the multiple steps of the hot cut process are not performed in the proper sequence, which requires coordination between BellSouth and the CLEC, service interruptions to the customer (*e.g.*, total loss of service or inability to receive incoming calls) will occur.

Q. HAS THE FCC ADDRESSED BELLSOUTH'S OBLIGATION TO PROVIDE AT&T UNE LOOP HOT CUTS?

A. Yes. BellSouth is legally required to provide AT&T with UNE loop hot cuts. Pursuant to the Telecommunications Act of 1996, BellSouth must provide nondiscriminatory access to unbundled loops and to number portability on

terms and conditions that are just and reasonable. 47 U.S.C. §§ 251(c)(3); 271(c)(2)(B)(iv),(xi). Moreover, the FCC has made clear that a BOC must demonstrate that "it provisions hot cuts in sufficient quantities, at an acceptable level of quality, and with a minimum of service disruption" in its offering of a meaningful opportunity to compete in the local exchange market.[2] Memorandum Opinion and Order, *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communication Act To Provide In-Region, InterLATA Service in the State of New York*, CC Dkt. No. 99-295, FCC 99-404, 1999 WL 1243135 (rel. Dec. 22, 1999) ¶ 291 (hereinafter "*Bell Atlantic 271 Order*"). *See also* Memorandum Report and Order, *Application by SBC Communications Inc., Southwestern Bell Telephone Company, And Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas*, CC Dkt. No. 00-65, ¶ 247 (rel. June 30, 2000) (footnote omitted) (hereinafter *"Texas 271 Order").*

As the FCC has observed, proper coordination of the hot cut between the Bell Operating Company ("BOC") and the CLEC is "critical because problems with the cut over could result in an extended service disruption for the customer." *Bell Atlantic 271 Order* ¶ 291 n.925. As the FCC explained

[2] The FCC has articulated a similar standard for UNE Loop hot cuts in prior orders, holding that a BOC "must demonstrate that it can coordinate number portability with loop cutovers in a reasonable amount of time and with minimum service disruption." *In the Matter of Application of BellSouth Corporation, et al. for Provision of In-Region, InterLATA Services in Louisiana*, CC Docket No. 98-121, Memorandum Opinion and Order, FCC 98-271 (rel. Oct. 13, 1998)(hereinafter "*Louisiana II*"), ¶ 279.

in its decision of Southwestern Bell Telephone Company's 271 application for Texas: "The ability of a BOC to provision working, trouble-free loops through hot cuts is critically important in light of the substantial risk that a defective hot cut will result in competing carrier customers experiencing service outages for more than a brief period. Moreover, the failure to provision hot cut loops effectively has a particularly significant adverse impact on mass market competition because they are a critical component of competing carriers' efforts to provide service to the small- and medium-sized business markets." *Texas 271 Order* ¶ 256 (footnotes omitted).

Q. WHY IS THE CUTOVER PROCESS IMPORTANT TO AT&T?

A. As the FCC recognized, unbundled local loops and the associated hot cuts are the principal means by which AT&T can compete for the small and medium size business market. AT&T must receive timely, accurate, and reliable hot cut loop provisioning from BellSouth so that AT&T can seamlessly transition its customers to AT&T's local service. Moreover, this issue is extremely important for end-users seeking to obtain local telephone service from providers other than BellSouth. As previously stated, coordination is crucial to converting the local service of a customer between BellSouth and AT&T because the change results in temporary loss of continuing service. This is unlike the situation that exists when a customer switches long distance service carriers without loss of service. In fact, the heart of this local service conversion process is coordination; clear and consistent communication between the two local service providers is crucial. Without an appropriately

defined and reliable process in place and predictable coordination between the two companies, the likelihood of the customer experiencing service quality issues, including a total loss of local dial tone, increases.

Consider the hypothetical owner of a pizza restaurant. He has a delivery business, and he depends on his local phone service. An unexpected or prolonged service outage at the wrong time can be devastating. For him to have a real choice among local service providers, he must be able to change carriers without risking his business. AT&T needs to be able to work with this customer to plan an appropriate schedule for the hot cut, and he must be able to rely upon that schedule.

Q. SPECIFICALLY, WHAT CONCERNS DOES AT&T HAVE IN BELLSOUTH'S HOT CUT PROCESS?

A. AT&T has the following concerns with BellSouth's current hot cut process:

- The BellSouth Firm Order Confirmation to AT&T does not commit to the due date and time, and is therefore not a commitment that AT&T and its customers can rely upon.
- Upon receipt of an LSR from AT&T, BellSouth does not query its database to check the Connecting Facility Assignment and the loop make-up prior to the issuance of a FOC. Without these checks, the FOC is nothing more than a confirmation that AT&T has made the request.
- If CFA problems arise after BellSouth has issued the FOC, BellSouth sends a clarification notice to AT&T instead of a jeopardy notice,

resulting in an insufficient time period to correct problems and meet the customer's requested due date and time.

- BellSouth does not notify AT&T 48 hours prior to the cutover due date that BellSouth has completed all engineering and central office work necessary to perform the cut, including Automatic Numbering Information and dial tone confirmation.
- AT&T pays non-recurring charges to ensure time-specific hot cuts, and BellSouth does not refund those charges even when BellSouth misses appointments.
- BellSouth does not meet the due dates contained in the FOC or times requested on AT&T's LSRs.
- BellSouth often closes orders improperly without notifying AT&T through the implementation contact phone number provided on the LSR.[3]

For AT&T and BellSouth to process coordinated hot cuts in an efficient manner that allows AT&T to meet customers' expected due dates and due times, the Tennessee Regulatory Authority ("TRA") must address AT&T's concerns as stated above.

Q. IS THE CONFIRMATION PROVIDED BY BELLSOUTH'S FOC ADEQUATE TO MEET AT&T'S BUSINESS NEEDS?

A. No. BellSouth's confirmation does not provide AT&T with a commitment from BellSouth that the hot cut will be performed at the requested time on the

[3] Both Parties agreed at the August 2000 Arbitration proceeding in North Carolina that this issue was

requested day. BellSouth has stated that it cannot commit to a date and time due to a lack of facilities and manpower. Until the date and time on the FOC becomes a commitment, AT&T cannot give the customer an estimated date and time with any degree of confidence. Currently, AT&T receives a FOC that merely confirms that AT&T's order has been accepted and establishes a possible due date on which our customers can expect service. It is important for AT&T to know early in the process that BellSouth has committed to a specific time for the hot cut. Thus, in order to meet the needs of AT&T and other CLECs in Tennessee, the date and time on the FOC should become a commitment.

Q. WHAT ACTION MUST BELLSOUTH UNDERTAKE TO ENSURE THAT THE DATE AND TIME STATED ON THE FOC CONSTITUTE A COMMITMENT?

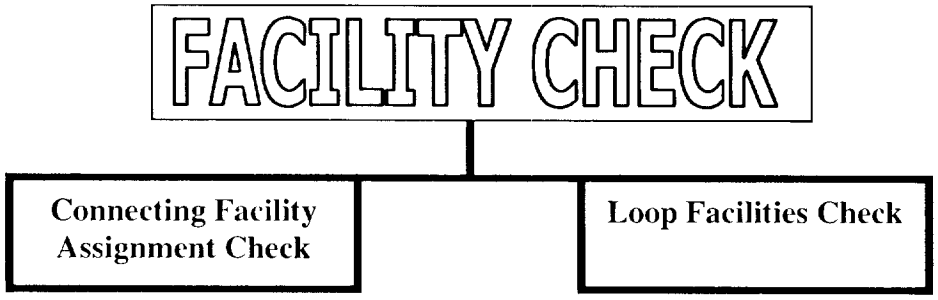
A. When BellSouth receives AT&T's LSR, it must perform a database facility check to determine that provisioning can be accomplished by the date and time requested on the order. BellSouth need only confirm Connecting Facility Assignment ("CFA") availability and loop make-up to determine if it has the required facilities. The facility check is necessary to determine whether BellSouth can meet the time requested by AT&T on behalf of the customer. Without a facility check before BellSouth issues the FOC, the chance of a customer's requested due date being missed is likely. This is unacceptable.

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resolved. However, BellSouth still does not follow the agreed-upon process.

Q. IN THE CONTEXT OF THIS ISSUE, PLEASE EXPLAIN THE COMPONENTS OF A FACILITY CHECK.

A. For the purpose of the hot cuts issue, a facility check consists of a search of BellSouth's Loop Facility Assignment Control System ("LFACS") database to confirm that a connection can be achieved from the CLEC collocation site located in BellSouth's central office to the customer's location.



- Checks cable and pair assignments in BST and AT&T databases to confirm that they match.
- Failure to timely check leads to clarifications which require resubmission of orders and delay of due dates.
- Checks make-up of loop from BST's central office to customer premises.
- Failure to do timely check leads to Pending Facilities ("PF") delays.

As the above diagram indicates, the facility check involves two components: a connection facility assignment ("CFA") check and a loop facilities check. The CFA check confirms that the connecting facility assignment located within the BellSouth central office matches the connecting facility assignment in AT&T's point of termination in the collocation space. The loop facilities check confirms whether the loop (the portion of wiring extending from the BellSouth central office to the customer's premise) is appropriate for the hot cut or requires design and assembly of an alternative.

Q. DOES BELLSOUTH PERFORM A FACILITY CHECK DURING THE HOT CUT PROCESS?

A. Yes. At this time, BellSouth performs the loop facilities check and the CFA check in the provisioning stage rather than before the issuance of the FOC. Because BellSouth performs these checks late in BellSouth's process, the FOC BellSouth provides does not constitute a commitment. Without a database facility check prior to the issuance of the FOC, AT&T cannot commit to a definite time for the customer with any degree of confidence. If BellSouth completed both the loop facilities check and the connecting facilities assignment check prior to the issuance of the FOC, the FOC would permit a firm order commitment that a CLEC and the customer can rely upon. BellSouth would then be able to commit to due dates and times.

Q. WHAT IS A CFA CHECK?

A. A CFA check is a query into AT&T's and BellSouth's software driven databases that is used to identify the physical assignment of cable and pairs connecting AT&T's point of termination to BellSouth's network. The database records queried contain cable and pair assignments that identify the status (active or spare) of the components required to establish an end-to-end (customer premise to central office) connection. If BellSouth's database shows AT&T's assignment as spare, the CFA verification step proceeds. If BellSouth's database shows AT&T's assignment as active instead of spare, a reject or clarification will be returned to AT&T, and both companies will

encounter rework activities in order to obtain a new cable pair for the customer's requested order.

Q. WHY IS A PRE-FOC CFA CHECK CRUCIAL TO THE HOT CUT PROCESS?

A. A hot cut cannot proceed unless BellSouth's facility assignment and AT&T's facility assignment are terminated on the correct connecting facilities. Under BellSouth's current process, when a CFA problem occurs after the FOC is issued, BellSouth issues a clarification which essentially restarts the ordering process and postpones the expected due date. This type of change inconveniences the customer and impairs AT&T's ability to gain customer confidence. Moreover, requiring an order to go through the process a second time, with all the concomitant duplicative work, is inefficient when compared to the minimal effort involved in performing a CFA check. Prior to sending the FOC, BellSouth should examine its database to determine whether the requested CFA is shown to be in use.

Q. WHAT IS A LOOP FACILITIES CHECK?

A. A loop facilities check is a query into BellSouth's software driven database that is used to identify the make-up of the loop connecting BellSouth's central office to the customer's premise. For a cutover to proceed, the loop connecting BellSouth's central office to the customer's premise must be copper wire, not Integrated Digital Loop Carrier ("IDLC").

Q. WHAT MUST BE DONE IF THE LOOP FACILITIES CHECK DETERMINES THAT THE LOOP IS IN AN IDLC SETUP?

A. The FCC stated in the Texas 271 order that a "BOC must provide competitors with access to unbundled loops regardless of whether the BOC uses integrated digital loop carrier (IDLC) technology."[4] If the loop is found to be in an IDLC setup, the loop must be re-designed into an individualized copper loop before it is cut-over to the AT&T connecting facility. An IDLC setup is converted to a copper loop setup in the design phase of the hot cut process by separating the individual loop or de-multiplexing the loop so that it can be moved over to AT&T.

Q. WHY IS IT CRUCIAL FOR BELLSOUTH TO PERFORM THE LOOP FACILITIES CHECK BEFORE ISSUING THE FOC?

A. Currently, BellSouth performs the loop facilities check at the provisioning stage, which is too late to incorporate the results into the due date provided to the customer. If BellSouth performs the loop facility check prior to the issuance of the FOC and discovers whether an IDLC setup is involved, BellSouth will be prepared for the design time accordingly. Consequently, the due date returned on the FOC will be a commitment rather than a confirmation because BellSouth will have more time to design the loop if necessary.

[4] *Texas 271 Order* at ¶ 248.

Q. DOES AT&T REQUIRE BELLSOUTH TO ACTUALLY DISPATCH ANY TECHNICIANS OR PERSONNEL TO ACCOMPLISH THE LOOP FACILITIES CHECK OR THE CFA CHECK DISCUSSED ABOVE?

A. Absolutely not. AT&T's proposal would not require BellSouth to dispatch any technicians or personnel to accomplish the facility check. Both components of the facility check involve referencing BellSouth's facilities database. BellSouth accesses the database to perform similar checks on a daily basis in response to orders from long distance carriers for access service and to service BellSouth's own customers. There is no reason BellSouth cannot provide the same service for local service providers. In fact, BellSouth witness Keith Milner testified recently[5] in the North Carolina arbitration hearing that there is no technical reason that the database facility check cannot be done on the local service order. BellSouth's current practice is counter-intuitive because AT&T is not notified of CFA or loop facilities problems until it is too late to address the problem and maintain the due date.

Q. HAS BELLSOUTH OFFERED TO CHANGE ITS PROCESS REGARDING THE LOOP FACILITIES CHECK AND CFA CHECK?

A. BellSouth has offered to change its process for the CFA check only. During negotiations between the parties, BellSouth has offered to allow AT&T to check BellSouth's available connecting facility assignments through BellSouth's LFACS database. Access to the LFACS database would allow AT&T to confirm BellSouth's connecting facility assignments prior to AT&T

[5] North Carolina Arbitration Hearing Transcript (Vol. IV, page 338, line 8.)

sending an LSR to BellSouth. However, AT&T still has a specific issue with each check:

1. AT&T's access to LFACS will not be available June 2001, and AT&T needs immediate resolution of this issue.
2. Even if AT&T has access to the loop make-up portion of the LFACS database, BellSouth must nonetheless check the loop make-up before issuing the FOC. The due date can remain intact if BellSouth plans accordingly for an IDLC loop make-up.

Q. WHAT IS THE ISSUE ON TIMING OF ACCESS TO LFACS?

A. BellSouth has tentatively stated that access to LFACS may be available to CLECs by June 2001. This is unacceptable. AT&T's present system for checking and synchronizing CFAs in the BellSouth and AT&T databases involves inefficient and cumbersome manual comparisons of hardcopy spreadsheets. AT&T needs access to LFACS immediately. BellSouth currently provides long-distance carriers access to the access facility portion of the LFACS database, and BellSouth also enables DSL providers to gain access to the loop make-up part. BellSouth should provide similar access for CLECs. Access to the LFACS database is imperative for implementing successful future hot cuts and encouraging real competition.

Q. WHAT ARE THE CONSEQUENCES OF BELLSOUTH NOT PERFORMING THE LOOP FACILITIES CHECK AND THE CFA CHECK PRIOR TO THE ISSUANCE OF A FOC?

A. When the loop facilities check and the CFA check are not performed before the issuance of a FOC, the following problems occur:

- Due dates are missed because of BellSouth's late design of a loop facility.
- AT&T agents are forced to rework orders and perform tasks that have already been performed. Therefore, resources are wasted on re-working old orders instead of hot cut activities.
- AT&T agents must perform redundant verifications of the CFA information previously obtained.
- AT&T is forced to supplement its original order or issue an entirely new order. Either scenario increases AT&T's costs.
- AT&T must perform unnecessary physical cable and pair assignment checks.
- When BellSouth does not check the CFA database before issuing a FOC and BellSouth's database is in error, AT&T is forced to issue a new facility assignment and restart the entire process.

All of these problems ultimately cause delay in customer orders and denial of new telephone service. Moreover, when a cutover cannot be made due to design problems, AT&T contacts the customer, and the customer must either reschedule for a new date and time or cancel the order altogether.

Q. WHAT IS THE NATURE OF THE DISPUTE BETWEEN AT&T AND BELLSOUTH WITH RESPECT TO BELLSOUTH ISSUING A CLARIFICATION INSTEAD OF A JEOPARDY NOTICE AFTER A FOC HAS BEEN ISSUED?

A. If a CFA discrepancy arises after issuance of the FOC, BellSouth currently issues a clarification, which removes AT&T's order from the process and requires resubmission of the order. Instead, BellSouth should issue a jeopardy notice, which would allow AT&T to remedy the CFA discrepancy promptly so the order can proceed and the customer's scheduled due date can be met. I have attached Exhibit RWM-2 illustrating the difference between the current process, in which BellSouth issues a clarification after the FOC, and the AT&T proposal, in which BellSouth would issue a jeopardy notice after the FOC.

Q. WHAT IS THE NATURE OF THE DISPUTE BETWEEN AT&T AND BELLSOUTH REGARDING PAYMENT FOR TIME-SPECIFIC HOT CUTS?

A. Presently all AT&T orders to BellSouth for local loops request coordinated and time-specific cutovers. In Tennessee, AT&T pays an extra charge of approximately $34 per LSR for the designation of a specific date and time for the hot cut. When BellSouth misses a hot cut due date or otherwise incurs a "missed appointment," these non-recurring, time-specific charges are not refunded. AT&T's position is that BellSouth may not charge AT&T or require AT&T to pay non-recurring time-specific fees for missed

appointments. *See* Exhibit RWM-3 AT&T's Proposed Language Regarding Ordering and Provisioning Hot Cuts §§ 3.1.3, 3.1.4.[6] BellSouth disagrees.

Q. EXPLAIN THE ISSUE REGARDING THE 48-HOUR CALL AT&T HAS REQUESTED.

A. In order to insure that a cutover proceeds smoothly and is accomplished on the date and at the time expected, AT&T has requested that BellSouth contact AT&T 48 hours prior to the cut to confirm that the engineering and central office work is complete. BellSouth will not commit to making a 48-hour call.

Q. WHY DOES AT&T WANT A CONCURRENCE CALL FORTY EIGHT (48) HOURS PRIOR TO THE CUT?

A. In the coordinated hot cut process, predictable communication is crucial. As BellSouth prepares to perform a hot cut, AT&T needs to be informed of the likelihood that its customer's service outage will proceed as scheduled. BellSouth should notify AT&T of the status of its work 48 hours prior to the scheduled cut. Ideally, the 48-hour call will simply confirm dial tone, Automatic Numbering Identification ("ANI") and loop pair assignment, and the hot cut will take place at the expected time. In the event that problems exist and BellSouth cannot confirm the required elements, AT&T must have that information 48 hours prior to the scheduled service outage so it can inform its customer of the potential change. AT&T can then assist BellSouth in the resolution of the problem in time to proceed with the hot cut on

[6] Exhibit RWM-3 is Exhibit C of Attachment 2 of AT&T's proposed Interconnection Agreement "Ordering and Provisioning Hot Cuts" as amended which produces AT&T's process enhancements to

schedule. AT&T has asked that BellSouth place a call 48 hours in advance of the customer's due date to confirm to AT&T that it has completed engineering and central office work. This is the last contact AT&T has with BellSouth to confirm that the cut will actually take place on the day and at the time AT&T has ordered.

The 48-hour call must confirm that dial tone and Automatic Numbering Identification have been tested and verify that all of BellSouth's work has been completed. When BellSouth does not confirm these key work items, it is an indication that a customer's due date may be missed. The dial tone test determines whether there is dial tone present on the line. If there is no dial tone, every element from the AT&T switch and the BellSouth central office main distribution frame must be verified and checked. The ANI check verifies that the proper telephone number has been assigned to the loop. Without the successful verification of dial tone and ANI the cutover cannot take place.

Q. DOES BELLSOUTH ADHERE TO A 48-HOUR CONCURRENCE CALL?

A. No. Even though BellSouth has agreed to place the call between 48 and 24 hours prior to the cutover, this is often not done. Even if the call is made, BellSouth often fails to provide the dial tone and ANI test results.

BellSouth's process.

Q. IN THE ABSENCE OF A 48-HOUR CONCURRENCE CALL, WHAT DOES AT&T PRESENTLY DO TO RECTIFY THIS SITUATION?

A. When BellSouth does not comply with the 48-hour call process, AT&T must place a call to BellSouth to ensure that the cut will take place as scheduled. AT&T has a responsibility to advise the customer that the due date and time on the BellSouth FOC will be missed. Without notification from BellSouth, AT&T is left with uncertainty whether the committed cutover will indeed take place, and the customer is left with the belief that the cutover will take place as scheduled. Only BellSouth can give AT&T the information required to confirm or cancel the cutover. AT&T pays for a time-specific cut and should have information regarding the schedule 48 hours in advance.

Q. DOES BELLSOUTH CLOSE ORDERS ACCORDING TO THE AGREED UPON PROCESS OF CALLING AT&T'S TOLL-FREE NUMBER?

A. No. AT&T cannot notify the customer the hot cut is complete until it receives the close-out call from BellSouth. The parties have developed a process to address this issue. Despite the parties' agreement, BellSouth consistently fails to utilize the designated process. The TRA should require BellSouth to adhere to the process and notify AT&T of hot cut completion via AT&T's designated 800 number.

Q. WHAT DAMAGE RESULTS FROM THE INADEQUACY OF BELLSOUTH'S CURRENT HOT CUT PROCESS AND BELLSOUTH'S FAILURE TO FOLLOW IT CONSISTENTLY?

A. The most significant damage is suffered by the customer who chose to leave BellSouth as his local service provider. The customer's business can be disrupted because his customers may be unable to reach the business. In the most extreme cases, AT&T has been forced to bear the expense of furnishing cellular telephones with Call Forwarding from the customer's landline business number until the problem can be isolated and repaired. BellSouth diminishes competition in the marketplace by failing to put detailed procedures in place to govern the steps to be taken at the appropriate time by each person engaged in performing hot cuts. Competition is further inhibited because BellSouth fails to follow procedures consistently and accurately.

Q. WHAT HAS AT&T DONE TO IMPRESS UPON BELLSOUTH THE IMPORTANCE OF ADOPTING A WORKABLE PROCESS AND IMPLEMENTING IT DILIGENTLY?

A. On numerous occasions, representatives of both companies have held discussions on hot cuts. AT&T has given to BellSouth language, attached as RWM-3, which illustrates how a workable process should function and the "step by step" sequence in which tasks should be performed. BellSouth officials have visited AT&T's hot cut ordering and provisioning center to better understand the action being taken by AT&T employees. Additionally, AT&T has proposed that BellSouth and AT&T reconcile performance data to determine what process improvements are appropriate. BellSouth has refused to voluntarily reconcile data with AT&T.

Q. HAVE ANY STATE COMMISSIONS REQUIRED BELLSOUTH TO ADHERE TO DATA RECONCILIATION TESTS TO MEASURE BELLSOUTH'S HOT CUT PERFORMANCE?

A. Yes. The Georgia Public Service Commission ("GPSC") recently ordered BellSouth to comply with a data reconciliation trial of eight (8) weeks reviewing three (3) CLECs' hot cut performance.

Q. WHAT WERE THE MEASURES INVOLVED IN THE GPSC'S DATA RECONCILIATION TEST?

A. The GPSC ordered BellSouth and three other CLECs to identify, measure and reconcile the following items for the provisioning of Unbundled Loops:

- Purchase order number
- Number of loops on each purchase order
- Scheduled start time
- Time BellSouth made call prior to start time
- Actual start time
- Actual stop time of hot cut
- Time BellSouth call that cut was done
- Troubles reported by CLEC on the day of the conversion, by noon the following day and within 48 hours of installation Date/Disposition of Trouble Reported

Q. WHAT DID AT&T OBSERVE DURING THE GPSC'S DATA RECONCILIATION TRIAL?

A. AT&T observed unacceptable BellSouth performance in meeting AT&T's time specific cut requirements. BellSouth employs the same hot cuts process in Tennessee as it does in Georgia, and AT&T believes that this trend of unacceptable hot cuts performance will be evident in Tennessee as well.

Q. ARE THE HOT CUT PROBLEMS CURRENTLY EXPERIENCED REFLECTED IN PERFORMANCE REPORTING THAT BELLSOUTH IS DOING TODAY?

A. No. Hot cuts have multiple steps that must be carefully monitored in order to prevent customer service disruption. No single measure can provide sufficient information to ensure a satisfactory customer experience. Despite the critical nature of this process and the wholesale customer dissatisfaction BellSouth can cause, monitoring in this area remains inadequate. The current hot cut measure BellSouth provides, labeled Coordinated Customer Conversion, only measures the interval from the time the technician disconnects the customer's loop from the BellSouth switch until he or she cross connects the loop to the CLEC's equipment. Critical hot cut issues are not measured, including the following:

- Whether the cut was performed too early;
- Whether the cut was performed too late;
- Whether the FOC was issued in time to allow the CLEC to timely activate the number porting process and perform other essential activities;

- Whether the customer's service was impaired;
- How long it took to restore the customer's service when interrupted during provisioning; and
- If the CLEC was notified of the cut so it could timely port the number.

Lack of timely and accurate performance in any one of these areas negatively impacts the customer's service.

Q. PLEASE STATE WHAT AT&T IS ASKING THE TRA TO DO REGARDING THE HOT CUTS PROCESS

A. AT&T would like the TRA to implement AT&T's proposed hot cut process. Specifically, that process would:

1. Make the confirmed due date on the FOC a commitment;
2. Require BellSouth to perform a facility check prior to the FOC;
3. Alternatively, require BellSouth to allow AT&T immediate access to BellSouth's LFACS Database on an electronic basis;
4. Require BellSouth to issue jeopardy notices, if necessary, after the FOC is issued;
5. Require BellSouth to place a call to confirm ANI and dial tone forty-eight (48) hours prior to the due date and due time of a time-specific ordered cut;
6. Require BellSouth not to impose on AT&T any non-recurring, time-specific charges for missed appointments; and

7. Require BellSouth to close orders by notifying AT&T according to the agreed-upon procedure.

Q. WHY SHOULD THE TRA ADOPT AT&T'S PROPOSED HOT CUT PROCESS ENHANCEMENTS?

A. The hot cut process advocated by AT&T includes detailed steps to be performed in a precise sequence by both BellSouth and AT&T. AT&T's current proposed language, attached as RWM-3, will help BellSouth and AT&T to better manage and coordinate joint efforts required in the hot cut process and minimize service disruptions to customers.

Knowing the steps that each employee is taking at each point in the process, as well as the timeframe for its accomplishment, will give both companies, and most importantly the customer, the ability to plan and conduct business with the least amount of disruption.

It is important for AT&T to have the ability to notify a customer when a particular action will be taken. BOCs in other regions have adopted a much more comprehensive and defined hot cut process than BellSouth. For example, Southwestern Bell and Bell Atlantic have adopted extensive and thorough processes which resulted from the collaborative efforts of CLECs, Bell Atlantic, Southwestern Bell, state commissions, and the FCC.

Q. IS THERE ANYTHING ELSE THE TENNESSEE REGULATORY AUTHORITY SHOULD ORDER RELATED TO HOT CUTS?

A. The Tennessee Regulatory Authority is in a unique position to deal with this issue. As a preliminary matter, the TRA should require BellSouth to provide

the enhancements to the hot cut process requested by AT&T. The process requested by AT&T would enable customers to switch their local service provider at the time requested with limited risk of service disruption and outage. At the same time, the TRA can review BellSouth's Tennessee performance by ordering that BellSouth reconcile Tennessee data with other CLECs. The TRA can then use this data to evaluate the need for improved performance measures and standards as part of a generic performance docket.

II. COLLOCATION – (ISSUES 11, 12 and 13)

Q. WHAT INTERVALS HAS BELLSOUTH PROPOSED IN THE INTERCONNECTION AGREEMENT?

A. It is my understanding that BellSouth proposed the following intervals for physical collocation in accordance with the FCC's Order: (1) physical collocation provisioning intervals would be no greater than 90 calendar days from the date of application for caged and cageless collocation; and (2) virtual collocation provisioning intervals would be 50 calendar days under ordinary conditions and 75 calendar days under extraordinary conditions.

Q. WHAT INTERVALS SHOULD THE TRA ORDER?

A. The TRA should order BellSouth to follow the intervals set by the recent FCC Order. These intervals should be measured from the day that BellSouth receives AT&T's Bona Fide Request for collocation, to the day that BellSouth turns over the space to AT&T for AT&T's use. In addition, these

intervals have been adopted by several state commissions, including Pennsylvania and Texas.

Q. SHOULD BELLSOUTH ALLOW AT&T TO CONNECT ITS FACILITIES TO BELLSOUTH AND CLECS WHEN OCCUPYING THE SAME BUILDING IN A CONDOMINIUM ARRANGEMENT? (ISSUE 12)

A. Yes. This should be a standard arrangement in a condominium environment, such as 185 Second Avenue in Nashville. It is a cost-effective and efficient method of interconnection for tenants in joint-tenant facility arrangements. Moreover, AT&T's use of its own space would free up scarce collocation space for other CLECs. Finally, this arrangement allows for a shorter interconnection interval than collocation and would bring about competition in the affected areas more quickly.

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

A. BellSouth's position is:

1. AT&T should not enjoy a form of interconnection through a condominium arrangement that no other CLEC has the ability to do; and
2. If this condominium arrangement allows for a use of cross-connects, BellSouth should not have to provide for such cross-connects between the CLEC's facilities and BellSouth's network.

Q. WHAT BROUGHT ABOUT THIS UNIQUE ARRANGEMENT?

A. At divestiture, AT&T used three-dimensional conveyance or Condominium Agreements as a way to satisfy the Modified Final Judgment's requirement to separate assets. Since AT&T and the BOCs both had network equipment in the same buildings, these agreements allowed each company to retain a portion of ownership in each of the buildings, rather than requiring one of the two parties to relocate all of their equipment in a new building. Because of these unique arrangements, BellSouth and AT&T can easily and more efficiently interconnect their facilities to provide varied services. Currently, this type of arrangement exists only in three central offices in the following Tennessee cities: Knoxville, Memphis, and Nashville.

Q. HOW SHOULD BELLSOUTH AND AT&T AVAIL THEMSELVES OF THIS UNIQUE ARRANGEMENT?

A. AT&T should locate in its Wire Center or designated premise equipment that enables AT&T to access BellSouth's network . Such equipment would be interconnected to BellSouth's network through a mid-span meet arrangement, *e.g.*, at the DSO, DS1, DS3, OC3, OC12, OC48, STS-1, STS-3c levels. AT&T would simply interconnect to BellSouth's network in the same manner as it would from the collocation area.

Q. DOES THE TELECOMMUNICATIONS ACT OF 1996 OR ANY FCC REGULATION REQUIRE CLECS TO PURCHASE COLLOCATION IN THIS SITUATION?

A. No. Although both the Act and FCC regulations impose on ILECs the obligation to provide collocation as a means of access to UNEs and interconnection, neither the Act nor FCC regulations require CLECs to purchase collocation as the only means of access to UNEs or interconnection.

Q. SHOULD AT&T BE ABLE TO CROSS CONNECT TO BELLSOUTH OR OTHER CLEC NETWORKS LOCATED IN THE BELLSOUTH PORTION OF THE BUILDING WITHOUT HAVING TO COLLOCATE IN BELLSOUTH'S PORTION OF THE BUILDING?

A. Yes. The FCC's *First Report and Order and Further Notice of Proposed Rulemaking; In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, FCC 99-48 (Adopted March 18, 1999) (hereinafter *Advanced Services Order*) encouraged this type of partnering with incumbent LECs in order to reduce costs and delays associated with competitors collocating in their central offices. In particular, the FCC held that:

> Incumbent LECs may not require competitors to use an intermediate interconnection arrangement in lieu of direct connection to the incumbent's network if technically feasible, because such intermediate points of interconnection simply increase collocation costs without a concomitant benefit to incumbents.

Id at ¶ 42.

Q. WHAT RESTRICTIONS HAS BELLSOUTH PROPOSED ON AT&T'S ABILITY TO ALLOW ITS EMPLOYEES AND AGENTS TO ACCESS ITS COLLOCATION SPACE? (ISSUE 13)

A. BellSouth demands that AT&T certify that criminal background checks have been conducted on each person AT&T wishes to assign to a BellSouth premise. Any person with a record of a felony conviction would be precluded from entry. BellSouth also would require that AT&T seek its permission before assigning to work in our collocation space any person whose record reflects a misdemeanor conviction.

Q. IS THIS A REASONABLE REQUIREMENT?

A. No. BellSouth's requirement is excessive. AT&T has agreed to reasonable steps to ensure the safety of BellSouth's property. AT&T has assured BellSouth that any AT&T representatives accessing collocation space will be bonded and that AT&T will indemnify BellSouth for any damage resulting from activities of an AT&T employee or agent. AT&T has also attempted to meet BellSouth's demands by offering to perform criminal background checks on employees who have been working for AT&T for less than two years. BellSouth rejected the offer.

Q. IS BELLSOUTH'S PROPOSAL ENUMERATED IN THE FCC RULES AS A REASONABLE SECURITY ARRANGEMENT?

A. No. *See Advanced Services Order*, FCC 99-48 ¶ 48. The reasonable arrangements include security cameras, restricted access and other monitoring systems. The BellSouth facilities that contain collocation space

to which AT&T representatives need access are equipped with some or all of these reasonable security measures. There is no indication that requiring criminal background checks will improve security. Indeed, BellSouth admitted in discovery that AT&T employees have had access to collocation space in BellSouth facilities for several years without any incident involving intentional damage to BellSouth's network.

Q. WHAT IS AT&T RECOMMENDING?

A. AT&T is recommending that the TRA allow BellSouth to impose only reasonable security arrangements, such as those listed in the FCC's *Advanced Services Order,* to protect their equipment and ensure network security and reliability.

Q. IN CONCLUSION, PLEASE SUMMARIZE WHAT YOU ARE ASKING THE TRA TO DO?

A. AT&T is asking the TRA to do the following:

1. Adopt AT&T's proposed changes to BellSouth's hot cut process, including:
   a. Require BellSouth to provide AT&T with a Firm Order Confirmation that commits to the due date and due time;
   b. Require BellSouth to perform a facility check before the FOC is issued;
   c. Alternatively, require BellSouth to provide AT&T with immediate electronic access to the LFACS database;

d. Require BellSouth to issue jeopardy notices rather than clarifications after a FOC has been issued;

e. Require BellSouth to notify AT&T forty-eight (48) hours in advance that all of the central office work is complete and the hot cut can proceed as scheduled;

f. Require BellSouth not to impose on AT&T any non-recurring time-specific charges for missed appointments; and

g. Require BellSouth to properly close orders by notifying AT&T according to the agreed upon procedure.

2. Require BellSouth to follow the collocation intervals set by the recent FCC order;

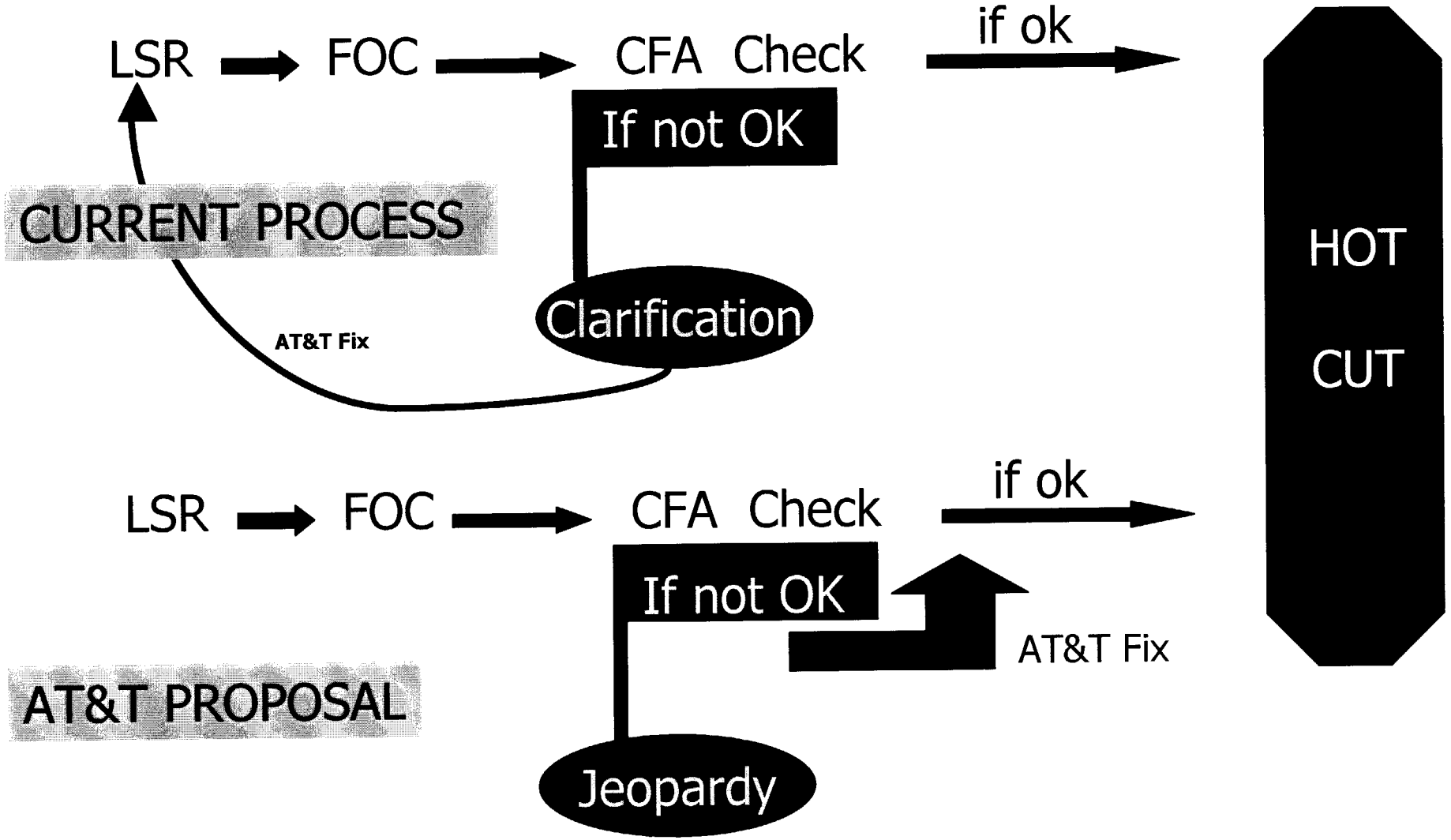
3. Allow AT&T to interconnect with BellSouth and other CLECs in condominium arrangements, as if the equipment located in the AT&T condominium space were located in collocation space; and

4. Allow BellSouth to impose only reasonable security arrangements to protect its equipment and ensure network security.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

JEOPARDY vs CLARIFICATION



CFA – Connecting Facility Assignment
FOC – Firm Order Confirmation
LSR – Local Service Request

Attachment 2

Exhibit C

Ordering and Provisioning Hot Cuts

1 This Exhibit contains the initial coordination procedures that the Parties agree to follow when AT&T orders and BellSouth provisions the conversion of active BellSouth retail end users to a service configuration by which AT&T will serve such end users by unbundled Loops and number portability (hereinafter referred to as "Hot Cuts"). Both Parties agree that these procedures may need to be refined or augmented if necessary as experience in ordering and provisioning Hot Cuts is gained, and they further agree to implement the improvement procedure provided in Section 4 below.

1.1 Except as otherwise agreed by the Parties, the time intervals for Hot Cuts shall be monitored and shall conform to the performance standards and consequences for failure to meet the specified standards as reflected in Attachment 9 of this Agreement, which is incorporated herein by this reference.

1.2 The following coordination procedures shall apply when BellSouth retail service is being converted to service to be provided by AT&T utilizing a SL2 local loop (as that term is defined in Section 3.1.3 of Attachment 2) provided by BellSouth to AT&T with SPNP or PNP (as these two acronyms are defined in Attachment 5, incorporated herein by this reference).

1.3 AT&T shall order Services and Elements as set forth in this Attachment 2 and BellSouth shall provide a Firm Order Confirmation ("FOC") (as that term and acronym are defined in Attachment 7, incorporated herein by this reference).

2 Ordering

2.1 AT&T shall request Hot Cuts from BellSouth by delivering to BellSouth a valid Local Service Request (LSR) using BellSouth's ordering interfaces described in Attachment 7 to this Agreement, incorporated herein by this reference. AT&T may specify a Due Date or Frame Due Time, as defined below, at any time, including twenty-four (24) hours a day and seven (7)

days a week. AT&T shall specify whether its service order is to be provisioned by BellSouth as either: (a) Order Coordination ("OC"); or (b) Order Coordination—Time Specific ("OC-TS"). OC shall mean the type of service order used by AT&T to request that BellSouth provision a Hot Cut on the particular calendar date as specified on the LSR and confirmed on the FOC as set forth in section 2.4, at any time during that day, referred to in this Exhibit as the "Due Date." OC-TS shall mean the type of service order used by AT&T to request that BellSouth provision a Hot Cut on the particular day returned on the FOC as set forth in section 2.4 and at the particular time specified on the FOC, referred to in this Exhibit as the "Frame Due Time." AT&T shall pay the appropriate rate for either OC or OC-TS as set forth in Exhibit **B** of Attachment 2. AT&T will be billed and will pay overtime for conversions requested and occurring outside of BellSouth's normal hours of operation as defined in Section 2.2 below.

2.1.1 Until such time as BellSouth's systems can deliver the requested frame due time on the FOC as set forth above, AT&T shall rely on the time requested on the LSR.

2.2 For purposes of this Agreement, BellSouth's normal working hours are defined as follows:

2.2. 1 Monday – Friday: 8:00 a.m. – 6:00 p.m. (Excluding Holidays)
(Resale/UNE non-coordinated, coordinated orders and order coordination-time specific)

Saturday - 8:00 a.m. – 6:00 p.m. (Excluding Holidays)
(Resale/UNE non-coordinated orders)

*AT&T has recently (TCG/AT&T [TN]
dated October 24, 2000) agreed to 8am – 6pm language and would like that agreement honored here.

2.2.2 It is understood and agreed that BellSouth technicians involved in provisioning service to AT&T may work shifts outside of BellSouth's regular working hours as defined in Section 2.2 above (e.g., the employee's shift ends at 7:00 p.m. during daylight savings time). To the extent that AT&T requests that work necessarily required in the provisioning of service to be performed outside BellSouth's regular working hour and that work is performed by a BellSouth technician during his or her scheduled shift such that BellSouth does not incur any additional costs in performing the work on behalf of AT&T, BellSouth will not assess AT&T additional charges beyond the rates and charges specified in this Agreement.

2.2.3 Should BellSouth choose to perform a cut without negotiating the time of the cut as set forth in and performs the cut outside of normal business hours whether it is earlier or later than the time requested on the LSR, AT&T will not be assessed overtime charges nor will AT&T be assessed OC-TS non-recurring charges.

2.2.4 Upon receipt of the LSR, BellSouth's Operational Support System (hereinafter "BellSouth's OSS") shall examine the service order to determine whether it contains all the information necessary for BellSouth to process the service order. BellSouth shall review the information provided on the LSR and identify and reject any errors contained in the information provided by AT&T for the current view of the LSR.

AT&T PROPOSAL

2.3 BellSouth shall provide AT&T real-time, electronic access to its LFACS database in the pre-ordering phase to allow AT&T to obtain loop make up and validate its connecting facility assignments prior to the issuance of an LSR. LFACS access shall commence within thirty (30) days of the execution of this agreement. Upon facility assignment validation by AT&T and upon receipt of AT&T's LSRs, BellSouth may issue clarifications to FOCs (Post-FOC Clarification) if BellSouth determines that a connecting facility assignment (CFA) assigned on AT&T's LSR is in conflict with BellSouth records. This Post-FOC clarification must be made within twenty-four (24) hours of issuance of the FOC by BellSouth.

2.3.1 Until such time as access to LFACS is implemented, and AT&T has the ability to obtain loop makeup and validate connecting facilities, LSRs may not be clarified after the FOC. The examination of the LSR shall include a comparison of the information provided on the Service Order with BellSouth's facility records to determine whether the information on the Service Order agrees with that shown in BellSouth's facility records, including but not limited to Loop Facility and Assignment Control System. Where BellSouth's facility records are inadequate or unavailable, BellSouth must perform a physical inspection of the facilities in order to determine whether such provisioning can be accomplished.

2.3.2 In Accordance with 2.3.1, until access to LFACS is functionally available to AT&T, and AT&T is able to obtain loop makeup and complete connecting facility assignment examinations through LFACS, when the physical inspection of facilities must be performed by BellSouth in order to determine whether such provisioning can be accomplished, BellSouth shall verify the (CFA) to ensure that the CFA at the physical termination is available for use and matches the CFA on the Service Order.

2.3.3 BellSouth shall also perform a loop facilities check prior to the issuance of the FOC, if necessary to provision the Service Order as requested.

2.3.4 If, as a result of such physical inspection, BellSouth determines either that a CFA is in conflict or that a loop facilities check deems the facilities unavailable, BellSouth shall issue a Post-FOC Clarification or a Pending Facilities (PF), if necessary, to AT&T within twenty-four (24) hours of the issuance of the FOC.

2.3.5 In the interim period between the execution of this Agreement and AT&T's access to BellSouth's LFACS database, BellSouth and AT&T will work cooperatively to ensure data base integrity is achieved between AT&T and BellSouth CFA assignments. This cooperative effort will include at a minimum: (1) AT&T ensuring that its processes support data base integrity, e.g., timely issuance of disconnects, proper assigning of facilities pending on canceled LSRs, and use of information provided by BellSouth to allow AT&T to identify and synchronize such data base; and (2) BellSouth will ensure that it processes AT&T requests for cancellation of local service requests in a time frame that allows AT&T to accurately maintain its CFA records; and (3) Access to COSMOS. This will be worked by the parties in development of the process improvement plan.

2.4 In the interim period between the execution of this Agreement and AT&T's access to BellSouth's LFACS database, BellSouth will provide AT&T with data base information via the BellSouth Interconnection Services website on a weekly interval, at a minimum, and BellSouth and AT&T will work jointly to identify and resolve any discrepancies between BellSouth and AT&T databases containing the CFA assignments.

2.5 Firm Order Commitment ("FOC")

2.5.1 Pursuant to Section 2.1 above, for purposes of this Exhibit, a "Firm Order Commitment" or "FOC" is a notification from BellSouth to AT&T that a service order is valid and error free and that BellSouth has committed to provision the service order on the date specified on the LSR and confirmed on the FOC and or on the date and time specified on the LSR and confirmed on the FOC for time specific conversions. BellSouth's committed due date is the date BellSouth strives to deliver service but is not a guaranteed date and may be revised due to Force Majeure provisions in the terms and conditions and acts of God. If the committed due date and or due time is missed due to BellSouth's facility or manpower shortages, BellSouth will mark this occurrence as a Missed Appointment ("MA") and waive the non-recurring charge assessed to AT&T for Time Specific orders.

2.5.2 For the initial LSR, BellSouth should not provide AT&T with either a request for clarification or a reject message after BellSouth provides AT&T a FOC, except as outlined in section 2 of this Exhibit. Supplemental LSR's must be submitted via the method utilized to submit the original LSR e.g. mechanized or manual unless conditions warrant otherwise and mutually agreed to by both parties.

2.5.3 BellSouth's measurement of FOC performance and clarifications/rejects as stated will be set forth in Attachment 9 incorporated herein by this reference.

3 Provisioning

3.1 Either party shall notify the other as soon as it becomes aware of any jeopardy condition which may arise which would jeopardize BellSouth's committed due date or OC-TS, as applicable, of providing service to AT&T.

3.1.1 Upon receipt of the FOC pursuant to Section 2.1, AT&T shall notify the customer of the Due Date and Due Time (OC-TS order). Either party shall notify the other party immediately if either party becomes unable to make the Hot Cut at the Due Time and or on the Due Date specified. New scheduled due dates and times shall be within BellSouth's normal hours of operation unless mutually agreed upon otherwise.

3.1.2 For OC-TS conversions, BellSouth will verify, in accordance with 3.2.12 (*infra*), the cut-over time designated by AT&T 48 hours in advance to ensure that the conversion is to be completed as ordered. If BellSouth fails to verify the cut-over time or fails to complete an OC-TS at the time or day ordered by AT&T, BellSouth will waive the non-recurring OC-TS charges. Both parties will ensure OC-TS, as identified in this paragraph, will commence within 15 minutes of the agreed time.

3.1.3 If BellSouth calls AT&T with greater than or at forty-eight (48) hours prior to the frame due time and due date (e.g. more than 48 hours until the time and date of cut) and initiates a request to change the due time and or due date, (a) The new due date shall be no longer than three (3) business days past the original missed due date; and (b) BellSouth will change the new due time and or due day in coordination with AT&T, but (c) AT&T will not be billed for nor will AT&T be required to pay any non-recurring time-specific (OC-TS) charges to BellSouth for the order.

3.1.4 In the event BellSouth initiates a request to change a due date and or due time within forty-eight (48) hours of the due date and or due time (e.g. with less than 48 hours until the cut is scheduled), the following

circumstances shall occur: (a) BellSouth shall document the order as a Missed Appointment ("MA"); and (b) BellSouth will coordinate the new due date and or due time with AT&T, but (c) AT&T will not be billed for nor will AT&T be required to pay any non-recurring time-specific (OC-TS) charges to BellSouth for the order.

3.1.5 Orders that are not worked on the requested and confirmed due date and or due time and remain un-worked after the due date and or time shall be known as "Backlog Orders." Orders become "Backlog Orders" due to BellSouth's inability to work an order and shall be treated as an MA within the BellSouth internal systems. Backlog Orders are those caused by such examples, which include, but are not limited to, tech availability, engineering not designed, BellSouth system problems, and BellSouth's workload.

3.1.6 In the event of a Backlog Order, the following shall occur: (a) BellSouth will notify and confirm to AT&T a new due date and due time that will be no longer than three (3) business days past the original missed due date and due time; and (b) the new due time shall be within BellSouth's normal hours of operation; and (c) BellSouth shall contact AT&T prior to the time of the cut with Dial Tone, ANI, Cable and Pair assignments, Number of lines, new Frame Due Time and Frame Due Date in the manner in which the first Concurrence Call (as defined *infra* at Section 3.2.12) was to be treated.

3.1.7 Backlog Orders due to AT&T's inability to process orders will be submitted to BellSouth as a Supplemental Order. Supplemental Orders must be submitted via the method utilized to submit the original LSR e.g. mechanized or manual unless conditions warrant otherwise and mutually agreed to by both parties

3.2 Upon receipt of the FOC, AT&T AND BellSouth agree to follow the procedures for porting numbers as outlined in attachment 5 and incorporated herein by this reference.

3.2.1 In the event that BellSouth discovers, during the provisioning process, a conflict between BellSouth's database and its physical facilities, indicating a lack of BellSouth facilities, BellSouth shall issue a Pending Facilities (PF) status by sending a jeopardy notice to AT&T.

3.2.1.1 Pending Facilities Order (PF) status occurs when a due date may be in jeopardy due to facility delay and may become Missed Appointments due to BellSouth reasons.

3.2.1.2 In the event that BellSouth cannot meet its committed Due Date and or Due Time because of PF status due to a BellSouth reason, the following

shall occur: (a) BellSouth will notify AT&T via telephone as soon as the order is placed in PF status; and (b) BellSouth shall document the order as a Missed Appointment ("MA") within BellSouth's internal systems; and (c) BellSouth will notify AT&T and electronically confirm within three (3) days an Estimated Completion Date ("ECD") and an Estimated Service Date ("ESD").

3.2.2 AT&T shall provide BellSouth with a toll free number as stated in the Implementation Contact Telephone Number ("ImpCon") Field on the LSR that BellSouth shall commit to call and use for all notification (as stated in 3.2.3 through 3.2.5) to AT&T. In addition, an AT&T representative will answer and respond within a reasonable period of time.

3.2.3 Prior to BellSouth's notification through the 48 hour Concurrence Call to AT&T (as defined *infra* at Section 3.2.5), if BellSouth does not find dial tone on the AT&T side when testing, and detects no trouble on the BellSouth side, BellSouth shall immediately notify AT&T. AT&T shall perform the appropriate internal tests and, if necessary, will dispatch a technician to its collocation site at the BellSouth Central Office. If the AT&T technician finds no trouble on the AT&T side when testing, AT&T will notify BellSouth. Both Parties will work cooperatively, to isolate and clear the trouble and arrange, if necessary, a joint meeting of a BellSouth technician and an AT&T technician at the last point of BellSouth's responsibility at the collocation site. Both Parties' technicians will meet at the collocation site to work cooperatively by jointly isolating the trouble, and repairing it. If either Party believes the trouble is not being resolved properly, either Party may escalate the matter for immediate resolution. BellSouth will continue to process the Service Order without requiring a supplemental order assuming that AT&T will correct the problem prior to the cut date and time. If the problem is determined to be a BellSouth problem and the cut date and or time has passed, BellSouth will waive non-recurring OC-TS charges, and the Parties shall establish, by mutual consent, a new due time and or due date to be met through expedited processing.

3.2.4 Prior to BellSouth's notification through the 48 hour Concurrence Call to AT&T (as defined *infra* at Section 3.2.5), if the AT&T technician does find trouble on the AT&T side, he or she will complete the appropriate repair as necessary. Unless AT&T notifies BellSouth that the "No Dial tone" issue has not been resolved, BellSouth shall continue to process the Service Order without requiring a supplemental order. AT&T agrees that BellSouth may rely on the lack of such notification to mean that AT&T believes it can resolve the "No Dial tone" issue prior to Due Date or Due

Time. AT&T shall not be required to call BellSouth to communicate that the "No Dial Tone" issue has been resolved. If at the time of the cut, AT&T dial tone is not detected on the BellSouth side of the Demarc and AT&T and BellSouth agree that the problem is due to AT&T and cannot be resolved within fifteen (15) minutes, BellSouth will standby and AT&T will compensate BellSouth according to the FCC's Standby tariffs. If AT&T does not wish to have BellSouth standby, AT&T will be required to supplement the order which will be submitted via the method utilized to submit the original LSR and request a new due date and time. If either Party believes that the process set forth herein is not satisfactorily implemented, the process improvement plan as described in Section 4.1 below will be applied. AT&T will ensure that dial tone is delivered to the BellSouth collocation pair 48 hours prior to due date at the time of the Concurrence Call.

3.2.5 For OC-TS conversions, BellSouth will verify the cut-over time and day designated by AT&T for OC-TS orders or verify the due date for OC conversions 48 hours in advance via telephone to ensure that the conversion is to be completed as ordered. In addition, BellSouth shall provide the following information at the time of this call: *dial tone and the ANI test results, Due Date, frame due time if the order is an OC-TS order, the number of lines and the cable and pair assignment.* This telephone call at 48 hours notifying AT&T with the above information stated in this Section 3.2.5, will be known as the "Concurrence Call." This verified information must be the same Due Date and Due Time as sent back on the FOC unless the Parties jointly agree on or before this concurrence call on a new due date or OC-TS as outlined in 3.1.3 (over 48 hours until the date and time of cut). If BellSouth fails to complete an OC-TS at the time and or date ordered by AT&T, BellSouth will waive the non-recurring OC-TS charges and charge itself a Missed Appointment. Both parties will ensure OC-TS as identified in this paragraph will commence within 15 minutes of the agreed time.

3.2.6 BellSouth will advise AT&T via jeopardy notice as soon as BellSouth becomes aware of a jeopardy condition which would delay the delivery of service to AT&T as outlined in BellSouth's FOC or time of conversion as mutually agreed to or as ordered by AT&T.

3.3 Activities At Time Of Cut

3.3.1 The Unbundled Network Element Center ("UNEC") will call AT&T to ensure AT&T's and BellSouth's readiness to complete the conversion as scheduled within fifteen (15) minutes of the start of the conversion. This call shall be known as the "Pre-Conversion" Call that will inform AT&T that the cut will begin at or within fifteen (15) minutes of this call.

3.3.1.1 If BellSouth fails to make the Pre-Conversion Call, BellSouth shall document the order as a "Missed Appointment" ("MA") within BellSouth's systems, and AT&T will not be billed nor be required to pay non-recurring Time-Specific (OC-TS) charges.

3.3.1.2 The UNEC will coordinate with all internal groups within BellSouth to start the conversion at the scheduled conversion time. Once notified, the central office technician will verify AT&T dial tone at the tied in jumper at the BellSouth cable pair and will perform an ANAC verification of the line at the BellSouth cable pair. If dial tone is verified and the line is verified to the correct number, the BellSouth central office technician will monitor the line and when idle, will remove the BellSouth jumper and terminate at the BellSouth main distribution frame (MDF) the tied in jumper to the AT&T collocation point. The BellSouth CO technician will then perform an ANAC verification of the line to verify AT&T dial tone and ensure the correct number is delivered to the BellSouth cable pair.

3.3.2 Activities After Hot Cut

3.3.2.1 The UNEC will then advise AT&T via telephone call that the cut is complete and allow AT&T to accept or reject the service. This call shall be known as the "Cut Complete" Call. BellSouth shall work cooperatively with AT&T to correct any problems associated with the conversion of the service which might result in AT&T's rejection of the service.

3.3.2.2 Should the situation arise such that §3.3.2.1 ("Cut Complete" Call) cannot be carried out (i.e. Should BellSouth not receive an answer on the toll free number provided by AT&T), BellSouth may escalate the matter for immediate resolution.

3.3.2.3 If BellSouth fails to contact AT&T after the hot cut and in accordance with the Cut Complete Call stated in Section 3.3.2.1 (Cut Complete Call Section) and Section 3.2.2 (number stated in the "ImpCon" Field of the AT&T LSR), the following shall occur: (a) BellSouth shall document the order as a "Missed Appointment" ("MA") within BellSouth's internal systems; and (b) AT&T will not be billed nor required to pay any non-recurring Time-Specific (OC-TS) charges.

3.3.2.4 BellSouth will hold open the conversion orders within the following time frames:

(a) If the Cut Complete call is received by AT&T prior to 5:00 p.m. on the conversion day, BellSouth will hold the order open until 6:00 p.m.;
(b) If AT&T requests the order be held open for a longer time, BellSouth will hold the requested order open until 12:00 noon the following business day;
(c) If the call is received by AT&T after 5:00 p.m. on the conversion day, BellSouth will hold the order open until 12:00 noon the following business day unless otherwise agreed to by the parties;
(d) If BellSouth does not receive verbal acceptance by AT&T pursuant to the above conditions, BellSouth will deem the conversion accepted by AT&T.

3.3.3 BellSouth and AT&T reserve the right to change its internal hot cut activities as business needs dictate and the changes do not conflict with the deliverables set forth in this Attachment 2.

3.3.3.1 When the change impacts service deliverables set forth in this Attachment 2, the party *requesting* the change shall submit the change via the process improvement mechanism set forth in Section 4 of this Attachment.

3.4 Loop Cut-Over Timing

3.4.1 BellSouth shall complete the loop cut-over step and notify AT&T of such completion in accordance with the section, commencing with the specified time committed to on the FOC and ending no later than the following time limits depending on the number of lines being cut. In the case of a Coordinated Order Time Specific or OC conversion:

1-10 loops => 60 mins (1 hour)
11-30 loops => 120 mins. (2 hours) unless project managed
31+ loops => Project Managed

3.4.2 BellSouth's commitment to performance as set forth in Attachment 9 of this agreement is incorporated herein by this reference.

3.4.3 Intervals for loops for a single end user on the same local service requests for loops greater than 30 will be completed at intervals mutually coordinated by both parties through Project Management. Both parties recognize that certain conversions requiring multiple cut points may exceed the above intervals but in any event both parties will work cooperatively to limit service outage to an end user.

3.4.4 In the event BellSouth does not complete the loop cut-over step within the appropriate time limit provided in Section 3.4.1 and notify AT&T of such completion in accordance with Section 3.3.2.1, AT&T may escalate such failure to the proper BellSouth official for expedited resolution immediately at the end of such time limit.

3.5 Completion Notice

3.5.1 BellSouth shall send AT&T completion notices when the LSRs are submitted electronically. If submitted manually, AT&T may determine the completion status for all LSRs by accessing the CSOTS Report via the Internet.

4 Process Improvement

4.1 Within seventy-five (75) calendar days of the Effective Date, the Parties agree to negotiate and adopt a process improvement method to be used throughout the term of this Agreement for amending and supplementing the initial procedures established in this Exhibit. Such process shall be implemented by the parties 30 calendar days from the date such method is mutually developed. Both parties will work cooperatively to identify areas for improvement and, if applicable, develop and implement process changes resulting from such mutual cooperation. Such method will provide the procedures to be employed on an on-going basis by the Parties when one Party wishes to improve any of the initial provisions set out in this Exhibit. Each improvement negotiated by the Parties must be documented in an attachment to the initial procedures as mutually agreed by the Parties.

4.2 In the event that the Parties are unable to enter into the improvement method contemplated by this Section 4.1 within ninety (90) days of the Execution Date, the Parties agree to resolve any disputes in accordance with the dispute resolution process provided in Section 16 of the General Terms and Conditions of this Agreement. Additionally, the Parties agree to seek such resolution on an expedited basis of any dispute involving a procedure that adversely impacts a customer.

5. Flow Chart (Struck Pending 3.2.12 resolution with BellSouth)

5.1 The flow chart below is incorporated herein by this reference and represents, in the form of diagrams, the initial coordination procedures described in this Exhibit. It is provided merely as an aid to understanding the provisions set out above; therefore, if any inconsistency is found

between the language of this Exhibit and the flow chart, the Parties agree that the language of this Exhibit shall control.

5.2 As the improvements contemplated by Section 4 are made, the parties agree to revise the flow chart as needed to show these improvements. Upon each revision, the Parties agree that each such revised flow chart shall become an exhibit to the attachment contemplated in Section 4.2.

6 New Loop Provisioning – "Loop Only"

6.1 BellSouth will provision new loops at intervals outlined in the Products and Service Interval Guide

6.2 Submission of LSR's, intervals, appropriate pre-service testing, jeopardy notification, completion and acceptance testing as outlined in the conversion activities will apply. However conversion activities not related to new service will not be required e.g. monitoring for idle line prior to jumper termination and etc.

6.3 BellSouth will deliver to the ordered location at the end users premises, loops as outline in TR 73600.