@ BELLSOUTH

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October 22, 2001

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VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

> Re: *Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations*
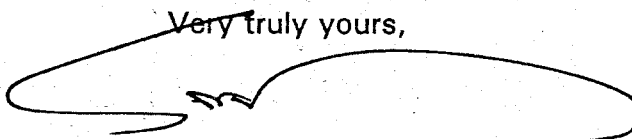> Docket No. 01-00362

Dear Mr. Waddell:

Enclosed are five paper copies and one CD version of the pre-filed Direct Testimony and Exhibits of the following witnesses:

Ken Ainsworth
Alfred Heartley
Milton McElroy

Alphonso Varner
Ronald Pate
David Scollard

CD versions of the attached testimony and exhibits have been provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

416701

1   TENNESSEE BELLSOUTH TELECOMMUNICATIONS, INC.

2   DIRECT TESTIMONY OF RONALD M. PATE

3   BEFORE THE TENNESSEE REGULATORY AUTHORITY

4   DOCKET NO. 01-00362

5   OCTOBER 22, 2001

6

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

8   TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

9

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

11   Telecommunications, Inc. ("BellSouth") as a Director, Interconnection

12   Services. In this position, I handle certain issues related to local

13   interconnection matters, primarily operations support systems ("OSS").

14   My business address is 675 West Peachtree Street, Atlanta, Georgia

15   30375.

16

17 Q.   PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

18

19 A.   I graduated from Georgia Institute of Technology in Atlanta, Georgia, in

20   1973, with a Bachelor of Science Degree. In 1984, I received a Masters of

21   Business Administration from Georgia State University. My professional

22   career spans over twenty-five years of general management experience in

23   operations, logistics management, human resources, sales and marketing.

24   I joined BellSouth in 1987, and have held various positions of increasing

25   responsibility since that time.

1

Q.   HAVE YOU TESTIFIED PREVIOUSLY?

2

3

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

Q.   IN WHAT CONTEXT SHOULD YOUR TESTIMONY BE READ?

A.   My testimony should be read in conjunction with other testimony filed in
       this proceeding.

       Exhibit OSS-1 provides a detailed list of all exhibits referenced in this
       testimony, and includes the Web addresses for the exhibits, if applicable.
       Further, for the convenience of the Authority, a list of acronyms has been
       provided as Exhibit OSS-67.

Q.   HOW IS YOUR TESTIMONY ARRANGED?

A.   My testimony is divided into the following sections:

PART A: EXECUTIVE SUMMARY OF THE TESTIMONY
PART B: COMPREHENSIVE DISCUSSION OF THE ISSUES
PART C: SUMMARY AND RECOMMENDATIONS FOR THE AUTHORITY

1   Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY?

2

3   A   In Section I of my testimony I will show this Authority that BellSouth

4   provides nondiscriminatory access to BellSouth's OSS in compliance with

5   the Federal Communications Commission's "(FCC's)" requirement that a

6   Bell Operating Company ("BOC") offer access to competing carriers that is

7   analogous to the OSS functions that a BOC provides to itself, and in

8   substantially the same time and manner.

9

10   I will demonstrate that BellSouth meets the FCC's two-step standard to

11   establish nondiscriminatory access to BellSouth's OSS that requires:

12

13   1. The BOC to deploy the necessary systems and personnel to provide

14   sufficient access to each of the necessary OSS functions, and that the

15   BOC is adequately assisting competing carriers to understand,

16   implement, and use the OSS functions available to them; and,

17

18   2. That the OSS functions that are deployed by the BOC are operationally

19   ready, as a practical matter.

20

21   As to the first step, BellSouth provides CLECs nondiscriminatory

22   access to its OSS for pre-ordering, ordering, provisioning, maintenance

23   and repair, and billing through robust and reliable manual and

24   electronic interfaces such as TAG, LENS, RoboTAG™, EDI, TAFI,

25   ECTA, ODUF, EODUF, and ADUF. These interfaces will be defined

1 and discussed in detail in the following testimony. BellSouth provides

2 CLECs with all the specifications necessary for integrating the

3 BellSouth interfaces, as required by the FCC. BellSouth makes the

4 human-to-machine interface Local Exchange Navigation System

5 ("LENS") available to CLECs that have made the business decision not

6 to integrate the machine-to-machine interfaces with their own internal

7 OSS, and do not want to expend the necessary resources to use

8 RoboTAG™. For requests that are designed to fall out for manual

9 handling, as well as those that can not be submitted electronically,

10 BellSouth provides sufficient personnel and processes for the handling

11 of such requests, as more fully described herein and in Ken

12 Ainsworth's testimony. Accordingly, BellSouth provides the necessary

13 systems and personnel for nondiscriminatory access to BellSouth's

14 OSS functions.

15

16 As to the second part of this first step, understanding, implementation

17 and use of the functions available, BellSouth has created a four-phase

18 turn up process for the provisioning of facilities and services to CLECs.

19 This process ensures that new CLECS are properly informed and

20 trained on BellSouth's full range of wholesale products, and the rules

21 and interfaces for obtaining these products. As referenced later, the

22 four phases are described in the testimony of Ken Ainsworth.   All

23 guides and manuals discussed in my testimony are available to CLECs

24 on the Interconnection Web site referenced herein. I will also provide

25 substantial evidence of the comprehensive training regimen that

1   BellSouth offers to CLECS. In sum, BellSouth asserts that the

2   comprehensive training, significant number of users of TAG and EDI,

3   combined with the substantial usage and integration of the pre-

4   ordering and ordering interfaces, clearly demonstrate the adequacy of

5   BellSouth's support and documentation for CLECS.

6

7   In further support of this position, I will discuss the Change Control

8   Process ("CCP") that evolved from the Electronic Interface Change

9   Control Process ("EICCP"). The EICCP was established by BellSouth to

10 secure input from the CLECs regarding future enhancements to existing

11 electronic CLEC interfaces, and to have an organized means of securing,

12 understanding, and ranking such input. This change management

13 process was designed to function on a region-wide basis so that the

14 CLECS in any of the nine states in BellSouth's region may participate.

15 The CCP documentation attached as Exhibit OSS-39 describes details on

16 the types of changes that are handled, how change requests are

17 classified, the escalation process, the dispute resolution process, and the

18 testing environment. BellSouth also makes access to this information

19 clear and easily accessible by providing the CLECs with a CCP website

20 which contains extensive documentation of the processes, forms, status

21 information, and other relevant information.

22

23 BellSouth believes that compliance with the second step of the standard is

24 easily met based upon the evidence that BellSouth's interfaces have been

25 used commercially for years. From January through July 2001, CLEC

1 sent 3,529,587 local service requests region-wide via BellSouth's

2 electronic interfaces. As a practical matter, the level of commercial usage

3 alone clearly demonstrates the operational readiness of these interfaces.

4 Additionally, as provided in the testimony of Alphonso Varner, BellSouth is

5 providing the Authority with performance measurements which will show

6 the Authority that BellSouth's OSS functions are operationally ready.

7

8 Thus, as confirmed by BellSouth's evidence of actual commercial usage

9 (the FCC's most probative standard to establish nondiscriminatory

10 access), BellSouth's interfaces, processes, and procedure provide CLECS

11 with access to the required OSS information and functions in substantially

12 the same time and manner as BellSouth's access for its retail customer,

13 and therefore conform to the FCC's definition of nondiscriminatory access.

14

15 Section II of my testimony will show that BellSouth's interfaces to its OSS

16 are the same in Tennessee, Georgia, or any of the other seven states in

17 BellSouth's region. I will demonstrate that BellSouth's OSS provides

18 CLECs with region-wide:

19 • electronic and manual ordering interfaces that provide uniform

20 functionality;

21 • comprehensive set of user guides, procedures, information, and

22 job aids for the use of the electronic and manual ordering

23 interfaces; and

24 • region-wide business rules with extensive training.

1   Additionally, BellSouth's OSS are designed, developed, modified, and

2   measured for performance on a region-wide basis to operate in an

3   undistinguishable manner whether a CLEC is in Tennessee, Georgia or

4   any of the other seven states in the BellSouth region. BellSouth engaged

5   PricewaterhouseCoopers ("PwC") to evaluate and confirm its assertion

6   that its OSS is regional in nature.   PwC affirmed BellSouth's assertions as

7   "…fairly stated, in all material respects" in its report, entitled "Report on the

8   Region-wide Comparability of BellSouth's Pre-Order and Order

9   Operational Support Systems as of May 3, 2001" (the "Comparability

10   Report") which is discussed in detail in the testimony of Milton McElroy

11   (attached to Milton McElroy's testimony as Exhibit MM-14).

12

13   Thus, BellSouth respectfully submits that the Authority can rely on the

14   independent third-party test performed in Georgia, the findings of PwC,

15   and the evidence of actual commercial usage, to determine that BellSouth

16   provides nondiscriminatory access on a region-wide basis to its OSS in

17   Tennessee.

18

19   PART B: COMPREHENSIVE DISCUSSION OF THE ISSUES

20

21   I.   NONDISCRIMINATORY ACCESS

22

23   Q.   DOES BELLSOUTH PROVIDE CLECS WITH NONDISCRIMINATORY

24   ACCESS TO ITS OSS?

25

1   A.   Yes. BellSouth provides CLECs with nondiscriminatory access to its OSS.

2   The Telecommunications Act of 1996 ("Act"), together with FCC

3   interpretations of the Act, require an incumbent local exchange carrier

4   ("ILEC") to:

5

6   •   provide nondiscriminatory access to its OSS on appropriate

7   terms and conditions;

8   •   provide the documentation and support necessary for CLECs to

9   access and use these systems; and

10   •   demonstrate that the ILEC's systems are operationally ready

11   and provide an appropriate level of performance.

12

13   Compliance with the requirements should allow competitors to obtain pre-

14   ordering information, execute service requests for resold services and

15   unbundled network elements ("UNEs"), report and manage troubles, and

16   obtain billing information. The level of access for all criteria should be

17   nondiscriminatory when compared to that of the ILEC's retail operations.

18

19   Q.   WITH RESPECT TO OSS, WHAT IS BELLSOUTH OBLIGATED TO

20   PROVIDE CLECS?

21

22   A.   In paragraph 87 of its Order on BellSouth's second 271 application for

23   Louisiana, the FCC reiterated its requirement stated in the Ameritech

24   Michigan Order and in the Local Competition First Report and Order "that

25   a BOC must offer access to competing carriers that is analogous to OSS

functions that a BOC provides to itself. Access to OSS functions must be

offered in 'substantially the same time and manner' as the BOC. For

those OSS functions that have no retail analogue . . . a BOC must offer

access sufficient to allow an efficient competitor a meaningful opportunity

to compete." The FCC reaffirmed this requirement in its orders granting

long distance relief to Bell Atlantic in New York (New York Order,

paragraphs 85-86) and Southwestern Bell in Texas ((Texas Order,

paragraphs 94-95).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, Memorandum Opinion and

Order and 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, Memorandum and Opinion.)

The FCC follows a two-step approach to determine if the BOC has met the

nondiscrimination standard for each OSS function. First the FCC will

determine, "whether the BOC has deployed the necessary systems and

personnel to provide sufficient access to each of the necessary OSS

functions and whether the BOC is adequately assisting competing carriers

to understand how to implement and use all of the OSS functions

available to them." Next, the FCC will determine "whether the OSS

functions that the BOC has deployed are operationally ready, as a

practical matter." This includes an examination of "performance

1 measurements and other evidence of commercial readiness." See

2 Second Louisiana Order, ¶ 85.

3

4 TESTING

5

6 Q. UPON WHAT TYPES OF EVIDENCE WILL THE FCC RELY TO ASSESS

7   AN RBOC'S PROVISION OF NONDISCRIMINATORY ACCESS TO

8   OSS?

9

10 A. The FCC emphasized that commercial or operational readiness can be

11   evidenced in several ways: actual commercial usage, carrier-to-carrier

12   testing, independent third-party testing and internal testing.   The FCC has

13   repeatedly stated that actual commercial usage is the most probative

14   evidence that OSS functions are operationally ready. Bell Atlantic New

15   York Order, ¶89. BellSouth's interfaces have been used commercially for

16   years. As will be shown more fully in the discussion of each interface, the

17   levels of commercial usage alone clearly demonstrate the operational

18   readiness of these interfaces. However, these interfaces, have also been

19   subjected to extensive third-party testing, as described in the testimony of

20   Milton McElroy, and carrier-to-carrier testing as discussed below.

21

22 Carrier-to-Carrier Testing

23

24 Q. HAS BELLSOUTH CONDUCTED CARRIER-TO-CARRIER TESTING OF

25   ITS ACCESS TO OSS?

1

A.   Yes. Six CLECs participated in a carrier-to-carrier Beta test of LENS

Release 6.0 from September 13 through September 24, 1999. The

CLECs tested pre-ordering, the new "fast-path" ordering, the new screen

design and activity flows, the view function for LSR order information, the

changes to the main menu, the options for user administration (such as

the ability to change the company code and passwords), and the new bulk

ordering function. Because LENS Release 6.0 is dependent on TAG

Release 3.0 which was still in development in September, not all the

functionality of LENS was tested.

During the test, the six CLECs successfully submitted 8,184 LSRs through

LENS Release 6.0. During the first nine days, BellSouth limited each

CLEC to 50 LSRs per day (a total of 300 per day). On the final day,

BellSouth lifted the limit, and the CLECs submitted 2,591 LSRs.

Based on the success of the LENS Release 6.0 Beta test, the CLECs

asked BellSouth to put the Beta version of Release 6.0 into production

before the scheduled implementation on January 14, 2000. BellSouth

complied with that request, and on October 25, 1999, the Beta version of

LENS Release 6.0 went into production.

Q.   DID BELLSOUTH CONDUCT BETA TESTING OF ITS OSS99 EDI

INTERFACE?

1   A.   Yes. BellSouth and AT&T successfully conducted a Non-LNP Beta Test

2   of OSS99. Connectivity testing was conducted from October 25, 1999 to

3   October 26, 1999. Syntax testing was conducted from October 27, 1999

4   to October 29, 1999. Carrier testing was conducted from November 1,

5   1999 to December 1, 1999. Approximately 25 LSRs were tested.

6   BellSouth and AT&T also successfully conducted a LNP Beta Test of

7   OSS99. Syntax testing was conducted from December 13, 1999 to

8   December 15, 1999.   Carrier testing was conducted from December 20,

9   1999 to January 14, 2000. Approximately 10 LSRs were tested. A variety

10   of test case scenarios were used during both the Non-LNP and LNP beta

11   testing. Further, BellSouth provides an open and stable testing

12   environment for the CLECs as discussed herein in the Change

13   Management Section.

14

15   SUMMARY OF THE INTERFACES

16

17   Entry Methods for CLECs

18

19   Q.   BRIEFLY DESCRIBE THE ENTRY METHODS BELLSOUTH MAKES

20   AVAILABLE TO CLECS.

21

22   A.   BellSouth provides CLECs nondiscriminatory access to its OSS for pre-

23   ordering, ordering, provisioning, maintenance and repair, and billing

24   through robust and reliable manual and electronic interfaces. The

25   electronic interfaces are: LENS, TAG, RoboTAG™, EDI, TAFI, ECTA,

1   ODUF, EODUF, and ADUF. BellSouth's OSS interfaces for CLECs are

2   operated and available on a regional basis. Below, I will discuss the entry

3   methods for resale, UNEs, and interconnection. I will describe the

4   interfaces for each required function, and will show how the CLEC

5   interfaces provide nondiscriminatory access to the required information

6   and functions. For each function, I also will describe how the interfaces

7   comport with any applicable industry standards.

8

9   Q.   PLEASE GENERALLY DESCRIBE THE INTERFACES AVAILABLE TO

10   CLECS.

11

12 A.   BellSouth has designed and implemented a variety of electronic interfaces

13   to suit the varied business plans and entry methods of the CLECs in

14   BellSouth's region. A CLEC's selection of an interface depends on its

15   business plan and entry strategy. CLECs can select from among the

16   interfaces described below to match their particular mix of services,

17   volume of orders, technical expertise, resources, and future plans. The

18   following chart depicts the entry methods and the nondiscriminatory

19   interfaces from which a CLEC may choose. Each interface will be

20   described in detail later in my testimony (including definitions of the

21   acronyms).

22

	Resale	UNEs	Facility-Based	Data
Pre-Ordering	TAG	TAG	TAG	TAG
	LENS	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™	RoboTAG™
Ordering & Provisioning	EDI	EDI	EDI	EDI
	TAG	TAG	TAG	TAG

	LENS	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™	RoboTAG™
Maintenance & Repair	TAFI	TAFI (TN-based)	TAFI	TAFI
	ECTA	ECTA	ECTA	ECTA
Billing	EODUF	ADUF	ODUF	N/A
	ODUF	ODUF		

2 Q.   DOES BELLSOUTH ALLOW CLECS TO SUBMIT LSRS MANUALLY AS

3   WELL AS ELECTRONICALLY?

5 A.   Yes. BellSouth does not require CLECs to transmit requests for resale

6   and UNE POTS-type services only by electronic interfaces, but instead

7   allows transmittal through manual interfaces for those CLECs that have

8   made the business decision to use only manual entry methods. As

9   mentioned earlier, manual interfaces and procedures are discussed in the

10   testimony of Ken Ainsworth.

12 Summary of Integrateable Electronic Pre-Ordering, Ordering, and Provisioning

13 Interfaces

15 Q.   HOW DOES BELLSOUTH PROVIDE CLECS WITH ACCESS TO ITS

16   PRE-ORDERING AND ORDERING OSS?

18 A.   BellSouth provides CLECs with access to the same pre-ordering, ordering,

19   and provisioning OSS accessed by BellSouth's retail units through the

20   machine-to-machine Telecommunications Access Gateway ("TAG")

21   interface. TAG, which was developed in response to specific requests

1   from mid-sized and large CLECs, provides a standard Application

2   Programming Interface ("API") to BellSouth's pre-ordering, ordering, and

3   provisioning OSS. TAG is based on Common Object Request Broker

4   Architecture ("CORBA"), which is one of the industry protocols for pre-

5   ordering. TAG follows the Ordering and Billing Forum ("OBF") guidelines

6   for LSRs. TAG pre-ordering has been available since August 31, 1998;

7   TAG ordering has been available since November 1, 1998. There are two

8   ways for CLECs to connect to TAG: LAN-to-LAN and the Internet. In

9   August 2001, 72 OCNs used TAG to send LSRs.

10

11   For its retail basic exchange service customers, BellSouth uses two retail

12   marketing and sales support systems to access pre-ordering, ordering,

13   and provisioning information from BellSouth's downstream OSS.

14   BellSouth uses the Regional Negotiation System ("RNS") for most types of

15   residential service requests. For business customers, BellSouth uses the

16   Regional Ordering System ("ROS").

17

18   In addition to TAG, BellSouth provides CLECs with access to the same

19   ordering and provisioning OSS accessed by the BellSouth retail units

20   through the machine-to- machine Electronic Data Interchange ("EDI")

21   interface for CLECs. EDI is not used to access pre-ordering OSS. EDI

22   follows the protocol (EDI) that was established for ordering and the OBF

23   guidelines for LSRs. EDI has been available to any interested CLEC

24   since December 1996. There are several EDI connectivity options

25   available: dedicated point-to-point connections; dial-up connections; and

1   Value-Added Network ("VAN") connections. BellSouth has postponed

2   indefinitely the introduction of Internet connectivity for EDI due to changes

3   in development resources prioritization. The diagram attached as Exhibit

4   OSS-2 depicts how BellSouth's and CLECs' systems interact with the pre-

5   ordering and ordering OSS. In August 2001, 40 OCNs used EDI to send

6   LSRs.

7

8   Q.   PLEASE DISCUSS INTEGRATION WITH RESPECT TO TAG AND EDI.

9

10   A.   In accordance with the FCC's requirements, BellSouth provides CLECs

11   with all the specifications necessary for integrating the BellSouth

12   interfaces. A CLEC may integrate ordering and pre-ordering functions by

13   integrating the TAG pre-ordering interface with the EDI ordering interface,

14   or by integrating TAG pre-ordering with TAG ordering.

15

16   CLECs have taken the specifications provided by BellSouth, and have

17   successfully integrated the TAG pre-ordering interface with the EDI and

18   TAG ordering interfaces. Because integration takes place on the CLECs'

19   side, BellSouth cannot specify exactly how many CLECs have integrated

20   the interfaces. However, it appears that approximately 14 CLECs have

21   integrated the TAG pre-ordering interface with the EDI interface and at

22   least 30 CLECs have integrated TAG pre-ordering with TAG ordering.[1]

23   AT&T has already successfully performed this integration using the TAG

---

[1] Because BellSouth deploys the same OSS throughout its nine-state region, it is appropriate to consider both regional and state-specific OSS data. See Second Louisiana Order ¶ 86. Because BellSouth's OSS is regional, it operates on a CLEC-by-CLEC basis rather than a state-by-state basis. As a result, state-specific data may be unavailable in some instances.

1   pre-ordering interface and the EDI ordering interface.[2] MCI/WorldCom

2   also has integrated TAG pre-ordering and EDI ordering, at least to the

3   extent that the end user's address is automatically populated in the LSR in

4   EDI.[3] ITC^DeltaCom has also acknowledged that it has integrated TAG

5   and EDI.[4]

6   Four CLECS, Cox Communications, Network Telephone Corporation,

7   CenturyTel, and NewSouth Communications have purchased and

8   integrated TAG pre-ordering and EDI ordering gateways built by DSET.

9   (Please see DSET's Web site, www.dset.com for the press releases

10   naming these CLECs.). Exhibit OSS-3 shows the usage of the pre-

11   ordering and ordering interfaces by CLECs, and indicating those CLECs

12   that BellSouth believes have successfully integrated pre-ordering and

13   ordering interfaces.

14

15   Summary of Other Electronic Pre-Ordering, Ordering, and Provisioning Interfaces

16

17   Q.   DOES BELLSOUTH OFFER CLECS INTERFACES OTHER THAN TAG

18   AND EDI?

19

20   A.   Yes. BellSouth recognizes that some CLECs have decided not to make

21   the investment necessary to develop the integrateable machine-to-

---

[2] See June 28, 2001 Proceedings Before the Alabama Public Service Commission, Cross-Examination of Jay M. Bradbury, at 2998 ("I do know that we have integrated in the past TAG with the EDI interface and I know that work has been done there and I would assume it's still going on.").
[3]See July 31, 2001 Proceedings Before the Alabama Public Service Commission, Cross-Examination of Sherry Lichtenberg, at 4635-4636.
[4] See June 29, 2001 Proceedings Before the Alabama Public Service Commission, Cross-Examination of Mary Conquest, at 3636-3637.

machine TAG and EDI interfaces. BellSouth, therefore, offers the CLECs other interfaces to suit their needs and business plans.

Some CLECs may wish to use TAG for pre-ordering and ordering, so that they have the ability to use their own databases, without the necessity of making the investment in programmers to develop and maintain their own TAG interface. For these CLECs, BellSouth sells a software package called "RoboTAG™." This software was developed by Science Applications International Corporation (SAIC), under contract with BellSouth. RoboTAG™ provides a standardized, browser-based interface to the TAG gateway that resides on a CLEC's LAN server, and integrates pre-ordering and ordering with up-front editing. RoboTAG™ became available in November 1999. The first CLEC that purchased RoboTAG™ completed testing and was ready for production on November 24, 1999. Six CLECs are using RoboTAG™.

BellSouth provides substantial support to CLECs using RoboTAG™. This support includes: performing a site survey before installation of RoboTAG™; developing a detailed project plan for installation; performing installation of RoboTAG™ (including training the CLEC's system administrator); providing the initial training for end users; providing a help desk; and providing fixes. BellSouth also is responsible for providing CLECs with updated versions of RoboTAG™. In other words, as TAG evolves with new releases, CLECs using RoboTAG™ will automatically receive upgrades of TAG.

1

2   CLECs using RoboTAG™ need a separate server or one with adequate

3   space to store all of its TAG transactions. This server allows the CLEC to

4   integrate the information obtained through TAG with its own internal OSS,

5   and eliminates the need for CLECs to perform any dual entry of

6   information. The CLEC must maintain licenses for certain third-party

7   software (NT Server, Cold Fusion, Sequel Server, and Orbix). The CLEC

8   is also responsible for participating in the RoboTAG™ User Group.

9

10   Q.   CAN CLECS USE A THIRD-PARTY VENDOR TO ACCESS

11   BELLSOUTH'S OSS?

12

13   A.   Yes. As yet another option available, CLECs may choose to use solutions

14   developed by third-party vendors. Albion International, Inc., Telcordia

15   Technologies, Exceleron Software, Inc., DSET Corporation, Mantiss,

16   Nightfire Software, Quintessent, and Eftia, for example, have developed

17   electronic interfaces to connect and integrate CLECs' systems with

18   BellSouth's OSS. In addition to the CLECs (mentioned earlier) that have

19   purchased DSET's gateway solution, various press releases note CLECs

20   such as Sprint, Now Communications, Teleconex, Rhythms, Covad,

21   DSLNet, and Adelphia Business Solutions as using third-party solutions.

22

23   Q.   DOES BELLSOUTH OFFER CLECS A HUMAN-TO-MACHINE

24   INTERFACE?

25

1   A.   Yes. For CLECs that have made the business decision not to integrate

2   pre-ordering, ordering and provisioning interfaces with their own internal

3   OSS, and do not want to expend the resources necessary to use

4   RoboTAG™, BellSouth makes available the human-to-machine Local

5   Exchange Navigation System ("LENS") interface. LENS is a Web-based

6   graphical user interface ("GUI").   LENS requires software development

7   only on BellSouth's side of the interface. BellSouth therefore is

8   responsible for implementing any changes or new version of the interface.

9   With the implementations of Release 6.0 of LENS on January 14, 2000,

10   LENS became a GUI to the TAG gateway. LENS uses TAG's architecture

11   and gateway, and therefore has TAG's pre-ordering functionality for resale

12   services and UNEs, and TAG's ordering functionality for resale services.

13   With Release 6.2 on April 15, 2000, LENS began using TAG's ordering

14   functionality for designed and non-designed unbundled analog loops,

15   unbundled digital loops, and for CLECs with contracts, unbundled two-wire

16   analog port plus two-wire analog loop combinations (the "UNE Platform").

17   LENS provides integrated pre-ordering and ordering in its firm order mode.

18   In order to use LENS, a CLEC must have, at a minimum, a personal

19   computer, Web browser software, and an internet connection (of course,

20   the CLEC must also test with BellSouth, attend training, and obtain a

21   password). LENS has been available since April 1997. In August 2001,

22   352 OCNs used LENS to send LSRs.

23

24   Q.   DESCRIBE FOR THE AUTHORITY SOME OF THE BENEFITS OF

25   LENS.

1

A.	Certainly. LENS reduces the input requirements for CLEC service

representatives by providing CLECs with shortcuts for commonly used

functions, such as disconnects, suspends, and restores. CLECs need

only to complete one input screen and one verification screen to process

these types of LSRs.

Another shortcut function specially tailored to CLECs' practices is the

addition on January 14, 2000, of a new feature in LENS called "bulk

ordering". This feature allows CLECs to send up to 500 LSRs to

BellSouth in a single order for conversions/switch as is, disconnects,

suspends, restores, and deny an account (temporary interruption for non-

payment). There are also two methods for bulk ordering in LENS. One

method allows the CLEC user to type up to 100 LSRs directly on a single

LENS screen. Using the other method, a CLEC user types up to 500

LSRs using any program that allows a file to be saved as "*.txt" (tab

delimited), such as Microsoft's Excel®. That file can be uploaded into

LENS and then sent to BellSouth. CLECs can check the status of each

LSR sent in a bulk order, just as they can for LSRs sent individually. In

July 2001, seventy-eight (78) CLECs used the bulk ordering feature for

resale services.

Q.	DO CLECS HAVE A MEANS TO TRACK THEIR SERVICE ORDERS?

1   A.   Yes. In December 1999, the CLEC Service Order Tracking System

2   ("CSOTS") became available to CLECs. This region-wide Web-based

3   electronic interface allows CLECs to view service orders on-line, track

4   service orders, and determine the status of their service orders. Region-

5   wide, 330 CLECs are using CSOTS.

6

7   Q.   WHAT ARE THE INDUSTRY STANDARD PRE-ORDERING

8   PROTOCOLS?

9

10   A.   In September 1997, the industry voted to approve two standard protocols

11   for pre-ordering interfaces: CORBA and EDI TCP/IP/SSL3. The industry

12   anticipated that CORBA "would emerge as the preferred long-term

13   solution." Memorandum from Melson to Sirles of 10/31/1997, at 1.)

14   BellSouth, therefore, began building the TAG pre-ordering interface to the

15   CORBA standard. However, BellSouth is now working with the CLECs via

16   the Change Control Process (discussed below) to add an EDI pre-ordering

17   interface. The Change Control Process will be discussed in depth later in

18   my testimony.

19

20   Summary of Electronic Maintenance and Repair Interfaces

21

22   Q.   DESCRIBE THE ELECTRONIC MAINTENANCE AND REPAIR

23   INTERFACES BELLSOUTH MAKES AVAILABLE TO CLECS.

24

A.   For BellSouth's retail customers with basic local exchange service,
BellSouth's business and residence repair center attendants use either a
business or residence version of the human-to-machine Trouble Analysis
Facilitation Interface ("TAFI"). BellSouth offers to CLECs a single TAFI
system that combines the complete functionality of the separate business
and residence versions of TAFI used by BellSouth's repair attendants.
Accordingly, the CLEC-TAFI functionality is superior to BellSouth's TAFI
since it can process both residence and business trouble reports on the
same processor. Therefore, CLEC-TAFI provides better than
nondiscriminatory access to BellSouth's maintenance OSS. Since it
became available to CLECs in March 1997, 80 CLECs have used TAFI to
enter trouble reports. Region-wide, 31 CLECs used TAFI in 2000 to make
251,900 entries in TAFI. Through July 2001, 33 CLECs have used TAFI
to make 158,612 entries region-wide.

BellSouth also offers CLECs the machine-to-machine Electronic
Communications Trouble Administration ("ECTA") Gateway which
provides access to BellSouth's maintenance OSS supporting both
telephone-number and circuit-identified services (i.e., designed and non-
designed services). It supports both resold services and UNEs. To date,
BellSouth has built five ECTA interfaces for CLECS. Two of those five are
currently conducting various levels of testing, and one is actively using the
ECTA interface. The other two still have the capability to access ECTA,
but apparently have chosen not to do so for their own internal business
reasons.

1

2 Summary of Electronic Billing Interfaces

3

4 Q.   DESCRIBE THE ELECTRONIC BILLING INTERFACES BELLSOUTH

5   MAKES AVAILABLE TO CLECS.

6

7 A.   BellSouth offers CLECs interfaces that provide billing information: the

8   Optional Daily Usage File ("ODUF"), the Enhanced Optional Daily Usage

9   File ("EODUF"), and the Access Daily Usage File ("ADUF"). ODUF has

10   been available since March 1996, EODUF since December 31, 1998, and

11   ADUF since December 31, 1997. In 2000, 200 CLECs used ODUF, two

12   used EODUF, and 38 used ADUF. In 2001, 247 CLECs are using ODUF,

13   three are using EODUF, and 71 are using ADUF. As I stated earlier, the

14   testimony of David Scollard describes the nondiscriminatory billing

15   processes for BellSouth and CLECs.

16

17 SUPPORT FOR CLECs

18

19 Documentation

20

21 Q.   DESCRIBE THE DOCUMENTATION AVAILABLE TO CLECS FROM

22   BELLSOUTH.

23

24 A.   In the Georgia Test, KPMG tested the content and accuracy of

25   preordering documentation for TAG (MTP, at IV-C-9 - IV-C-15, attached to

1   Milton McElroy's testimony as Exhibit MM-3), ordering documentation for

2   EDI and TAG (MTP, at V-H-12 - V-H-19, attached to Milton McElroy's

3   testimony as Exhibit MM-3), and maintenance and repair documentation

4   for TAFI and ECTA (MTP, at VII-H-5 – VII-H-22; VII-I-5 - VII-I-8, attached

5   to Milton McElroy's testimony as Exhibit MM-3), and found all the test

6   criteria satisfied.

7

8   BellSouth has created a four-phase turn up process for providing facilities

9   and services to CLECs. This process ensures that new CLECs are

10   properly informed about and trained on BellSouth's full range of wholesale

11   products, and the rules and interfaces for obtaining those products. The

12   four steps are described in the testimony of Ken Ainsworth.

13

14   The guides and manuals discussed below and elsewhere in this testimony

15   are available to CLECs on the Interconnection Web site.

16   http://www.interconnection.bellsouth.com/index.html.) Most are available

17   to CLECs at the Interconnection Web site in two versions, the HTML

18   format and the Portable Document Format ("PDF"). Using the PDF

19   format, CLEC representatives can copy the guides and manuals to their

20   computers' hard-drives.

21

22   BellSouth provides CLECs with information that affords a general

23   overview of the requirements necessary to activate an account and to

24   work with BellSouth. This information is contained in the *BellSouth Start-*

25   *Up Guide*, attached to this testimony as Exhibit OSS-4. Because this

1 guide provides CLEC readers with general information about how to do

2 business with BellSouth, the guide also refers to more detailed

3 documentation when appropriate. This guide is designed to be used by

4 both resale and facilities-based CLECs. Included in the *BellSouth Start-*

5 *Up Guide* are topics such as: BellSouth and CLEC roles and

6 responsibilities; activation for resale and facilities-based CLECs; electronic

7 interfaces and gateways; and, CLEC training.

8

9 In order to provide CLECs with a high-level understanding of the current

10 procedures and processes used to acquire products and services from

11 BellSouth, BellSouth has developed the *BellSouth Pre-Ordering and*

12 *Ordering Overview Guide* (Exhibit OSS-5). Included in this guide is an

13 overview of the pre-ordering and ordering processes with references to

14 more detailed documentation and resources. The guide also contains a

15 list of manual and electronic options for submitting pre-ordering and

16 ordering transactions.

17

18 BellSouth business rules for pre-ordering are contained in the *BellSouth*

19 *Pre-Order Business Rules*, the *BellSouth Pre-Order Business Rules*

20 *Appendix*, and the *BellSouth Pre-Order Business Rules Data Dictionary*.

21 They are attached to this testimony as Exhibits OSS-6, OSS-7, and OSS-

22 8. These documents outline the pre-ordering query and response

23 transactions.

24

1   By adhering to the pre-ordering and ordering business rules recognized by

2   BellSouth's systems, CLECs can avoid errors and rejected LSRs.

3

4   BellSouth's business rules for placing electronic and manual LSRs are

5   contained in the *BellSouth Business Rules for Local Ordering* ("BBR")

6   document. The BBR provides the Business Rules for electronic or manual

7   ordering for CLECs that have converted to TCIF 9 (Release 6.0 of the

8   electronic interfaces, a/k/a OSS99, or higher) and/or LSOG 4 (manual

9   standards). The BBR is attached to this testimony as Exhibit OSS-9.

10

11   Q.   WHERE CAN CLECS FIND SPECIFICATIONS FOR EDI?

12

1   A.   The specifications for EDI are contained in a set of documents that

2   comprise the BellSouth EDI Specifications. The chart below lists the

3   specification documents.

4

BellSouth EDI Specifications	Exhibit Number
Administration	OSS-10
850 Purchase Order Transaction Set	OSS-11
855 Purchase Order Acknowledgment Transaction Set	OSS-12
860 Purchase Order Change Request Transaction Set	OSS-13
865 Purchase Order Change Ack/Req Transaction Set	OSS-14
997 Functional Acknowledgment Transaction Set	OSS-15
EDI Testing Guidelines for CLECs	OSS-16

5

6   Q.   WHERE CAN CLECS FIND INFORMATION ABOUT LOCAL EXCHANGE

7   ORDERING?

8

9   A.   The *Local Exchange Ordering Implementation Guide* ("LEO Guide")

10   provides the Business Rules for electronic ordering following the OBF's

11   TCIF 7 guidelines. It is available in the HTML and PDF formats on the

12   Interconnection Web site and is labeled Volumes 1-4. (The LEO Guide is

13   available for CLECs that have chosen not to upgrade their machine-to-

14   machine electronic interfaces to TCIF 9. The equivalent rules for TCIF 9

15   are contained in the BBR and the EDI Specifications, as described above.)

16   Volumes 2 and 3 of the LEO Guide include the required Universal Service

1   Order Codes ("USOCs") and valid combinations. Specifically, Volume 2

2   lists the products and services available to the CLECs for ordering and the

3   associated requirements for ordering. Volume 3 lists the UNEs available

4   for ordering and the associated requirements for ordering. Volume 4

5   provides the specifications for users of EDI TCIF 7.0. Volumes 1-4 of the

6   LEO Guide are attached as Exhibits OSS-17, OSS-18, OSS-19, and OSS-

7   20.

8

9   Q.   CAN CLECS ACCESS THE USOC MANUAL ON THE WEB?

10

11   A.   Yes. BellSouth has made the USOCs and FIDs (Field Identifiers)

12   available in the USOC Manual in several formats at the BellSouth

13   Interconnection Web site, including a format that allows CLECs to

14   download and import the manual into commonly-used database programs.

15   Once the CLEC decides which services it will offer, it need only find the

16   USOCs that correspond with the services in the USOC Manual, and refer

17   to the LEO Guide or the BBR to determine what modifications or

18   restrictions exist for the service. The *CLEC USOC Manual-Listed*

19   *Alphanumerically* is attached as Exhibit OSS-21. (The *CLEC USOC*

20   *Manual-Listed by Service Category* is available at

21   http://www.interconnection.bellsouth.com/guides/usoc/html/gusoc101/inde

22   x.html. *The Common Spaced Value (.csv)* version of the USOC manual,

23   which may be downloaded and imported into commonly-used database

24   programs is available at

25   http://www.interconnection.bellsouth.com/guides/usoc/csv/usocc2_0500.c

sv.) The *Interconnection USOC Manual-Listed Alphanumerically* is

attached as Exhibit OSS-22.   (*Interconnection USOC Manual-Listed by*

Service Category is available at

http://www.interconnection.bellsouth.com/guides/usoc/csv/ussocc.csv.

The *Common Spaced Value (.csv)* version of the USOC manual, which

may be downloaded and imported into commonly-used database

programs is available at

http://www.interconnection.bellsouth.com/guides/usoc/csv/usocc1_0500.c

sv.) Also, BellSouth has published a document on the FIDs. The

BellSouth FID Glossary for CLECs provides a comprehensive alphabetical

listing of FIDs and their associated descriptions. This glossary is attached

as Exhibit OSS-23.

Q.   WHAT INFORMATION DOES BELLSOUTH PROVIDE TO CLECS

     ABOUT ERROR CODES?

A.   BellSouth provides CLECs with a document called *Local Service Request*

     Error Messages that lists the error codes and the associated messages

     that are returned to the CLECs when an LSR contains a CLEC error. This

     document is attached as Exhibit OSS-24. (This exhibit provides the error

     messages for TCIF 9 (OSS99 or Release 6.0). Error messages for TCIF

     7.0 are also available on the Interconnection Web site

     (http://www.interconnection.bellsouth.com/guides/statusing/pdf/w72tcif7.p

     df) for those CLECs that have chosen not to upgrade their systems.

     Additional error information is available through the *LENS User Guide*:

1   http://www.interconnection.bellsouth.com/guides/html/LENS_TAFI.html

2   and the Service Order Edit Routine (SOER) error messages:

3   http://www.interconnection.bellsouth.com/soeredits/soer_doc.html.) A

4   CLEC may use this information to correct its error(s) and submit a

5   supplemental LSR.

6

7 Q.   WHAT OTHER DOCUMENTS ARE AVAILABLE TO ASSIST CLECS?

8

9 A.   There are several other documents available on the *BellSouth*

10   *Interconnection Services – Customer Guides and Documentation* website

11   to assist CLECs with the interfaces and the OSS. These documents

12   include: the *LENS User Guide*; the *CLEC TAFI End-User Training Manual*;

13   the *CLEC TAFI User Guide*; the *Products and Services Interval Guide*; the

14   *ECTA Start-up Guide*; and the *LNP Reference Guide*. I discuss these

15   documents in more detail below and in the section on training.

16

17   In addition, BellSouth has established a *CLEC "OSS Information Center"*

18   Web page at the Interconnection Web site.

19   (http://www.interconnection.bellsouth.com/carriertypes/lec/html/oss_info.ht

20   ml) This page provides access to information such as the Change Control

21   Process and the Performance Measurements Web site. The OSS

22   Information Center page also contains a password-protected link to

23   documentation for TAG.

24

1   The specifications for TAG are found in the *TAG API Reference Guide*

2   Exhibit OSS-25. (This documentation is for the TCIF 9 version of TAG.

3   BellSouth also posts documentation for the TCIF 7 version of TAG on the

4   same password-protected Web page.)   For some releases, BellSouth

5   occasionally provides CLECs with release notes, compatibility matrices, or

6   programmer's job aids. BellSouth makes the actual API available for

7   download at a password-protected page on the Interconnection Web site.

8   (This documentation is for the TCIF 9 version of TAG. BellSouth also

9   posts documentation for the TCIF 7 version of TAG on the same Web

10   page.)

11

12   Q.   DOES BELLSOUTH PROVIDE CLECS WITH INFORMATION ABOUT

13   LOCAL NUMBER PORTABILITY ("LNP")?

14

15   A.   Yes. *BellSouth Business Rules for LNP* are provided in the BBR and the

16   LEO Guide. These documents have been available to CLECs since

17   LNP's implementation in August 1998. In order to assist CLECs with

18   ordering LNP, BellSouth developed the *LNP Reference Guide*, which is

19   attached as Exhibit OSS-27. The *LNP Reference Guide* is intended to

20   supplement the business rules contained in the BBR, and the LEO Guide.

21   The *LNP Reference Guide* contains detailed diagrams and narratives

22   showing process flows for LNP.

23

24   The processes and procedures that are used to implement LNP were

25   developed by the North American Numbering Council ("NANC") and the

1   Southeast Region LNP Operations Team, which is comprised of CLECs

2   and BellSouth. All parties may obtain the documentation on the industry

3   processes and procedures directly from the Number Portability

4   Administration Center ("NPAC"), which is operated by Neustar, Inc., the

5   independent organization that oversees the porting of telephone numbers.

6   (NPAC's Web site is http://www.npac.com.)

7

8 Q.   DESCRIBE THE INFORMATION AVAILABLE ON CSOTS.

9

10 A.   The *CLEC Service Order Tracking System User's Guide* is available at the

11   Interconnection Web site and at the CSOTS Web site. A copy of the

12   guide is attached as Exhibit OSS-28. A computer-based tutorial for new

13   users is also available at the CSOTS site.

14

15 Q.   HOW DOES BELLSOUTH PROVIDE CLECS WITH INFORMATION

16   ABOUT RETAIL PROMOTIONS?

17

18 A.   Information about BellSouth's retail promotions is made available to

19   CLECs via written notice.

20   (http://www.interconnection.bellsouth.com/index.html) Additionally,

21   BellSouth sends information about retail promotions to certain CLECs by

22   e-mail, as specified in their interconnection agreements. CLECs may

23   incorporate this information into their own internal pre-order/order

24   negotiation systems, as BellSouth has incorporated this information into its

25   own internal pre-order/order negotiation systems.

1

2 Q. IS BELLSOUTH'S DOCUMENTATION ADEQUATE TO ALLOW CLECS

3 NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OSS?

4

5 A. Yes. The significant number of users of TAG and EDI, combined with the

6 substantial usage and integration of the pre-ordering and ordering

7 interfaces that I described earlier, clearly demonstrate the adequacy of

8 BellSouth's documentation for CLECs. As the FCC has noted, the

9 adequacy of an interface's documentation is demonstrated by the fact that

10 CLECs are using the interfaces in a commercial environment. ("As an

11 initial matter, we agree with SWBT and the Texas Commission that the

12 adequacy of SWBT's documentation is demonstrated by the fact that

13 several competing carriers have constructed and are using EDI interfaces

14 in a commercial environment." SWBT Texas Order, paragraph 120.)

15 Based upon information contained in BellSouth's Percent Flow-through

16 Requests Report, in January, 2001, 26 OCNs used EDI and 71 OCNs

17 used TAG. In February 2001, 36 OCNs used EDI and 65 OCNs used

18 TAG In March, 2001, 32 OCNs used EDI and 59 OCNs used TAG. (Here

19 the term Operating Carrier Number ("OCN") is used instead of CLEC

20 when making reference to a horizontal line of data represented on the

21 flow-through report. This is because each line of data represents an OCN

22 and some CLECs have multiple OCNs. Thus, on the flow-through report

23 two or more OCNs may represent a CLEC's total data.)

24

1   KPMG also performed integration testing "to evaluate the degree to which

2   a CLEC could develop automated integrated transactions and to highlight

3   any inconsistencies in field name(s) and format between pre-order and

4   order forms." (See KPMG MTP Final Report, page V-13 (March 20, 2001)

5   attached to Milton McElroy's testimony as Exhibit MM-3) All evaluation

6   criteria associated with the pre-order/order integration test were satisfied.

7

8   Training for CLECs on the Electronic Interfaces

9

10   Q.   DOES BELLSOUTH OFFER CLECS TRAINING ON ELECTRONIC

11   INTERFACES?

12

13   A.   Yes. BellSouth has developed extensive training for CLEC employees.

14   Currently, BellSouth offers a wide variety of training courses specifically

15   for CLECs. The following chart provides information on the training

16   classes held since 1998.

17

Training Information	1998	1999	2000	1st & 2nd Quarter 2001
# of Classes taught at BellSouth sites	130	87	78	34
# of Suitcased classes taught[5]	11	36	29	31
# of CLEC Companies	38	395	152	63
# of New Students	1,095	1,156	1,162	749
# of Free CLEC Workshops	N/A	N/A	N/A	3

18

19   BellSouth offers CLECs training courses to help them work efficiently with

20   BellSouth. The courses are designed to aid the CLECs' understanding of

21   the CLEC-BellSouth relationship and the procedures and services

---

[5] "Suitcased" means that the training is provided at the CLEC's premises.

1   involved. They are taught by instructors experienced in BellSouth's

2   procedures and telecommunications industry processes. The courses are

3   held in Atlanta, Georgia and Birmingham, Alabama, and are available on a

4   first come, first seated basis. CLECs also can arrange to have training at

5   their premises ("suitcased" classes).

6

7   Information about the training offered to CLECs, including course

8   descriptions, schedules, and registration forms, is posted at BellSouth's

9   Interconnection Web site.

10   (http://www.interconnection.bellsouth.com/training/index.html)

11

12 Q.   WHAT ARE SOME OF THE COURSES OFFERED TO CLECS BY

13   BELLSOUTH?

14

15 A.   The courses currently offered to CLECs are: CLEC Basic; CLEC Basic

16   Service Ordering; Basic Unbundled Network Elements; TAFI; LENS;

17   Customer Service Record Understanding; Complex Products Service

18   Ordering; Collocation; Data Unbundled Network Elements; Directory

19   Listings Forms; Switched Port/Loop Combinations; and, Tariff.

20   (Descriptions for all courses are located at

21   http://www.interconnection.bellsouth.com/training/html/CLEC_class_info.ht

22   ml)

23

24   In October 1998, BellSouth began offering a training course for the

25   CLECs' TAG programmers. This course provides the CLECs'

1   programmers with information and instruction to prepare them to design

2   and develop client applications for the BellSouth TAG gateway. The

3   CLECs' programmers are required to know the C++ programming

4   language in order to attend this course. The agenda for this course is

5   attached as Exhibit OSS-29.

6

7   BellSouth offers two courses to CLECs that provide fundamental

8   information on the BellSouth-CLEC relationship. "CLEC Basic" is a five-

9   day course that covers pre-ordering, ordering, provisioning, maintenance

10 and repair. The two-day "CLEC Basic Service Ordering" course is a

11 condensed version of the CLEC Basic course. Documents containing the

12 course description, the objectives, and the agenda for CLEC Basic and

13 CLEC Basic Service Ordering are attached as Exhibits OSS-30 and OSS-

14 31.

15

16 Since May 1997, BellSouth has conducted regularly-scheduled training

17 classes in LENS for CLEC representatives. Before taking the three-day

18 LENS course, the CLEC representative is required to have completed

19 CLEC Basic or CLEC Basic Service Ordering or have current knowledge

20 of how to submit local service requests correctly. During this class

21 BellSouth provides the CLEC representatives with hands-on training in

22 LENS. This course is designed to acquaint attendees with LENS and to

23 enable them to successfully utilize LENS in a live production environment.

24 The Business Rules are used as reference tools during the class. A

1   document containing the course description, performance objectives, and

2   course agenda is attached as Exhibit OSS-32.

3

4   For additional information about LENS, including examples and screen

5   shots, CLECs may refer to the Local Exchange Navigation System (LENS)

6   User Guide. This guide is attached as Exhibit OSS-33.

7

8   BellSouth provides regularly-scheduled, two-day training classes in TAFI

9   for CLEC representatives. This class provides attendees with a high level

10   of simulation and hands-on interactions with the TAFI training databases.

11   Before taking the TAFI course, the CLEC representative is required to

12   have completed CLEC Basic or CLEC Basic Service Ordering, or to have

13   experience in either provisioning or maintenance of local exchange

14   service.

15

16   The *CLEC TAFI End-User Training Manual* is used during the class as a

17   training text and the attendees become acquainted with the *CLEC TAFI*

18   *User Guide* as a reference. Both are attached as Exhibits OSS-34 and

19   Exhibit OSS-35. A document containing the course description,

20   performance objectives, and course agenda is attached as Exhibit OSS-

21   36.

22

23 Q.   DOES BELLSOUTH OFFER OTHER COURSES TO CLECS?

24

1 A.   Yes. A composite exhibit of agendas for these courses that are offered to

2   the CLECs is attached as Exhibit OSS-37.

3   Below is a description of the other courses offered to CLECs:

4

Course Name	General Description	Length
Customer Service Record ("CSR") Understanding	Provides attendees a very broad overview of the BellSouth business procedures; focuses on how to read a CSR and how to complete LSR forms.	2 days
Complex Products Service Ordering	Provides information on BellSouth's voice and data communication products and services targeted at the Business market; includes the service description of each product, tariff reference, technical functionality, features and service order procedures.	3 days
Basic UNE Overview	Introduces the concept of UNEs; provides general descriptions of the more common UNEs with instructions for ordering as well as a brief description of the billing elements involved.	3 days
Collocation	Introduces physical and virtual collocation; provides general descriptions of the collocation processes with instructions for completing the applications as well as a brief description of the billing elements involved.	2 days
Data UNEs	Introduces UNEs with focus on Data CLECs and DLECs; provides instructions for ordering manually and electronically; provides information about billing elements.	3 days
Directory Listings Forms	Provides instructions for completing directory listing forms and caption request forms; provides basic listing terminology; introduces Yellow Page Headings; provides instructions on necessary forms for specific requests.	1 day
Switched Port/Loop Combinations	Provides descriptions of the products with instructions for ordering including a brief description of the billing elements involved.	2 days
Tariff	Familiarizes attendees with the four types of tariffs used by BellSouth; introduces the various products and services contained in tariffs; instructs about jurisdictional differences.	2 days

5

6   To monitor and improve the training offered to the CLECs, the trainers

7   provide a course evaluation form to each attendee at the end of each

8   course. The evaluations, which are submitted anonymously, focus on the

9   effectiveness and efficiency of each class.   On a scale of 1 to 5, with 5

10   being the highest, the overall average for 2000 was 4.6. The overall

1   average for the first and second quarters of 2001, is 4.86. Clearly, CLECs

2   are very satisfied with the training offered by BellSouth.

3

4   Q.   DOES BELLSOUTH OFFER ANY SELF-DIRECTED TRAINING FOR

5   CLECS?

6

7   A.   Yes. BellSouth also has developed Web-based training for CLECs, so

8   that representatives of CLECs can train whenever their schedules allow.

9   (https://CLECu.learn.net/) Three courses are currently available: the

10   CLEC Basic Course, the Resale LENS Course, and the TAFI course.

11   Attached as Exhibit OSS-38 are descriptions of the Web-based training

12   courses.

13

14 Q.   HOW DOES BELLSOUTH ENCOURAGE CLEC TRAINING?

15

16 A.   From February 1 to July 1, 2001, BellSouth offered a rebate of up to

17       $300.00 for each participant who attended the courses for CLEC Basic

18   Service Order, Basic UNE Overview, Data UNEs, Switched Port/Loop

19   Combinations, and Collocation. The total credit was based on the number

20   of days that the course was scheduled ($100.00 per day) and the

21   completion of both the pre- and post-test forms and the evaluation work

22   sheet by the participant. The average cost of a course is $325.00 per day.

23   Most courses are 2-3 days in length. Between February 1 and July 1,

24   2001, BellSouth issued $13,500 in rebates to 29 CLECs.

25

1   In addition, in 2001, BellSouth began offering free workshops for CLECs.

2   The purpose of these workshops is to address topics related to the

3   provisioning and completion of the CLECs' orders. BellSouth has

4   scheduled six workshops for 2001. Workshops have already been held in

5   February, April, June, and August of 2001. Sixty-seven CLEC

6   representatives attended the workshop in February 2001, 70 attended in

7   April 2001, 48 attended in June 2001, and 25 attended in August 2001.

8   The last two workshops are scheduled for October and November of

9   2001.

10

11   Q.   DOES BELLSOUTH OFFER ANY OTHER MEANS OF CONVEYING

12   INFORMATION TO CLECS?

13

14   A.   When the occasion warrants, BellSouth hosts periodic conferences for

15   CLECs. For example, on October 26, 1999, BellSouth hosted a day-long

16   forum to inform CLECs about the interface enhancements scheduled for

17   January 2000. Other topics discussed at this forum included change

18   management, LNP, UNEs, training, and education. Again, on May 2-3,

19   2000, and on November 1-3, 2000, BellSouth held forums to bring CLECs

20   up-to-date on the services and products offered by BellSouth. Some of

21   the topics included OSS enhancements, loop makeup, line sharing and

22   xDSL matters, updates on the UNE Remand Order, the Change Control

23   Process, training, and new product development.

24

1   Additionally, BellSouth held a CLEC Inforum on July 15-17, 2001. This

2   Inforum provided CLECs with information on how to improve operational

3   efficiency, sales and marketing initiatives, educational sessions and

4   workshops with information about the latest BellSouth products. CLECS

5   were also provided with the opportunity to talk one-on-one with Subject

6   Matter Experts in several areas such as complex resale support group

7   (CRSG), product management, and CLEC training.

8

9   For example, the loop makeup ("LMU") user group session specifically

10   provided CLECS with information on the LMU product we offer, including:

11   manual versus mechanized submissions (how to do and common

12   mistakes); technical information related to interpreting LMU responses to

13   qualify a loop; how LMU relates to the firm order and shared proposed

14   enhancements, and contract language necessary for using LMU.

15   BellSouth also offered the CLECs an opportunity to provide their input for

16   product improvement.

17

18   Help Desk

19

20   Q.   DOES BELLSOUTH PROVIDE HELP DESK CAPABILITY TO CLECS?

21

22   A.   Yes. For technical problems with the electronic interfaces, such as

23   connectivity and password problems, CLECs may call the Electronic

24   Communications Support ("ECS") Group. This help desk is staffed from

25   8:00 a.m. until 5:00 p.m. Central Time, and CLECs may contact it using a

1 toll free number (888-462-8030). BellSouth provides a toll free pager

2 number for help during nights, weekends, and holidays.

3

4 The Change Control Process document contains instructions for reporting

5 outages (Type 1 change requests) to the ECS Group. Both the document

6 and change requests are discussed below in "Change Management."

7

8 Other Support

9

10 Q. DOES BELLSOUTH PROVIDE CLECS WITH SUPPORT IN ADDITION

11   TO THAT DISCUSSED IN YOUR TESTIMONY?

12

13 A. Yes. Please see the testimony of Ken Ainsworth for descriptions of the

14   BellSouth groups and centers that support CLECs, including their use of

15   the electronic interfaces.

16

17 CHANGE MANAGEMENT

18

19 Third-Party Test of Change Management

20

21 Q. DID KPMG TEST THE CHANGE MANAGEMENT PROCESS IN

22   GEORGIA?

23

24 A. Yes. Both the Master Test Plan and the Supplemental Test Plan of the

25   third-party test in Georgia included a test of change management. All

1   evaluation criteria related to these exceptions are now satisfied. (MTP, at

2   VIII-A-15 – VIII-A-23, attached to Milton McElroy's testimony as Exhibit

3   MM-3), as explained in further detail in the testimony of Milton McElroy.

4

5 The Change Control Process

6

7 Q.   PLEASE DESCRIBE THE ORIGINATION OF THE CHANGE CONTROL

8   PROCESS.

9

10 A.   BellSouth's original Electronic Interface Change Control Process

11   ("EICCP") was established because of BellSouth's need to secure input

12   from the CLECs regarding future enhancements to existing electronic

13   CLEC interfaces, and to have an organized means of securing,

14   understanding, and ranking such input. From the beginning of the

15   EICCP's development, BellSouth sought the participation of the CLECs.

16   BellSouth began discussions with CLECs about change control in October

17   1997. BellSouth held further meetings with the CLECs in early 1998. A

18   steering committee comprised of representatives of BellSouth, AT&T,

19   MCI, Sprint, e.spire, LCI, and Intermedia, developed, approved, and

20   signed the original EICCP document. The EICCP document described the

21   process by which BellSouth and CLECs managed requested changes to

22   the electronic interfaces for CLECs. On May 15, 1998, the EICCP

23   became effective, by agreement of all representatives of the steering

24   committee. The EICCP was used throughout BellSouth's region.

25

1 Q. WAS THE EICCP REGIONAL OR STATE-SPECIFIC?

2

3 A. The development of the EICCP was accomplished on a regional basis.

4   Since its inception, the EICCP has been purposefully designed to work on

5   a regional basis, and to involve CLECs operating in all BellSouth states.

6   Because of the regional nature of the implementation effort, no single

7   public service commission or Authority reviewed or approved the EICCP.

8   The GPSC recommended the implementation of a change control process

9   for the electronic interfaces in its Order of April 21, 1998 in Docket No.

10   8354-U. Since that time BellSouth's change management processes have

11   functioned on a region-wide basis so that the CLECs in any of the nine

12   states in BellSouth's region may participate.

13

14 Q. WHAT CHANGES DID THE ORIGINAL EICCP COVER?

15

16 A. The original EICCP handled the following categories of changes: software;

17   hardware; industry standards; products and services; new or revised edits;

18   process; regulatory; and documentation. In accordance with the process

19   developed by the CLECs and BellSouth, the scope of the EICCP did not

20   include the following: Defect Change Requests (requests to correct

21   defects in electronic interfaces); Bona Fide Requests; Production Support;

22   and contractual agreements. Change requests of this nature were

23   handled through other processes. For example, CLECs contacted the

24   BellSouth "single point of contact" ("SPOC") when they discovered a

25   defect in an electronic interface.

1

2 Q. DID THE ORIGINAL EICCP EVOLVE OVER TIME?

3

4 A. Yes. As a result of the Bell Atlantic New York Order and the independent

5 third-party test in Georgia, BellSouth identified certain areas of the EICCP

6 that needed enhancement. On January 26, 2000, during an EICCP

7 Steering Committee meeting, BellSouth discussed enhancements of the

8 EICCP with the CLECs. Pursuant to the EICCP, a workshop for all

9 participating CLECs was held on February 16-17, 2000, so BellSouth and

10 the CLECs could properly propose changes to the process. After the

11 workshop, BellSouth distributed a draft revised Change Control Process

12 document to the CLECs. In February and March 2000, BellSouth and the

13 participating CLECs held follow-up conferences on issues raised during

14 the workshop and the proposed changes.

15

16 At the workshop of February 16 –17, 2000, BellSouth proposed that the

17 EICCP be expanded to include: BellSouth- and CLEC-initiated defect

18 change requests, both documentation and software changes that are

19 CLEC-affecting; BellSouth-initiated enhancements requests that are

20 CLEC-affecting (CLEC-initiated enhancement requests are already

21 included in the existing process); oversight of BellSouth's escalation and

22 defect notification processes; formalized escalation and defect notification

23 processes; as well as, definition of how the new processes will be

24 incorporated into the existing change control structure. BellSouth also

25 proposed renaming the EICCP to the Change Control Process ("CCP"),

1   because the revised process encompasses change control for the

2   electronic interfaces and manual processes. The newly revised process

3   included the addition of monthly status update meetings that were open to

4   all CLECs, and a formalized escalation process. BellSouth and the

5   participating CLECs have been responsible for working together to

6   develop the EICCP, to revise the EICCP, and to approve and revise the

7   resulting process.

8

9   Q.   HOW MANY CLECS PARTICIPATE IN THE CCP?

10

11 A.   There are approximately 127 registered members with the CCP (as of

12   May 1, 2001), consisting of 117 CLECs and 10 vendors. However, not all

13   of them participate in any given meeting. As additional information, there

14   are approximately 1,700 Commission- or Authority-approved CLECs in the

15   nine-state BellSouth region, and approximately 300 are actually doing

16   business in the local telecommunications market (as of May, 2001). In

17   Tennessee, those numbers are approximately 197 and 98 respectively.

18

19   BellSouth has made a proactive effort to inform all CLECs region-wide

20   about the CCP, and has encouraged their membership and active

21   involvement. A meeting agenda is prepared and distributed prior to each

22   meeting, a review of our records for recent months indicate an average of

23   ten CLECs participate in the CCP meetings.

24

1 Q. WHAT STEPS DID BELLSOUTH TAKE TO SEEK CONSENSUS FROM

2 THE CLECS ON THE NEW CCP?

3

4 A. BellSouth attempted to obtain consensus for the new CCP from the

5 participating CLECs. Although the CLECs had substantial input into the

6 design of the new CCP, and the CLECs agreed with the items in the new

7 CCP, a few CLECs, including AT&T, wanted additional items added to the

8 new CCP before granting their approval. BellSouth was concerned that

9 these CLECs were attempting to game this process by withholding their

10 consent to a plan that the other CLECs and BellSouth had agreed on,

11 because they were aware of the importance of the CCP to the completion

12 of the Georgia third-party test and the approval of the FCC. BellSouth

13 was faced with the possibility that these CLECs would hold out indefinitely,

14 which would, among other things, delay BellSouth's ability to satisfy issues

15 raised by the third-party testing. As a result, on April 14, 2000, BellSouth

16 notified the CLECs that the revised process would become effective on

17 April 17, 2000, and that it would be considered an interim process ("interim

18 CCP"). In addition, this notice directed CLECs to the new CCP Web site,

19 and explained the new email notification for System Outages and defects.

20 On April 17, 2000, at a meeting of BellSouth and the Interim CCP Steering

21 Committee (ITC^DeltaCom, WorldCom, AT&T, and Sprint), BellSouth

22 proposed a three month trial for the interim process. BellSouth informed

23 the Steering Committee that, at the end of the trial, BellSouth would ask

24 the CLECs again to approve a final base-line CCP document. WorldCom

25 and ITC DeltaCom verbally agreed to this plan.

1

2   During the three month trial of the interim CCP, all participants agreed to

3   add procedures. These changes were incorporated in the "final" CCP

4   document. For example, the participants decided to include requests for

5   changes to the testing process for the CLEC interfaces. AT&T has

6   already submitted a change request of this nature (discussed below in the

7   section on the testing environment).

8

9 Q.   WHAT HAPPENED AT THE END OF THE TRIAL PERIOD OF THE

10   INTERIM CCP?

11

12 A.   The three-month trial for the interim CCP ended in July, 2000. BellSouth

13   told the CLECs during the monthly status meeting on June 26, 2000, that

14   a vote would be taken during the July meeting. On July 26, 2000, the

15   participants met for their monthly status meeting. One item on the agenda

16   was the future of the interim CCP and the interim CCP document.

17   Because the meeting lasted three hours, which was well over its allotted

18   time, no vote was taken. The vote was postponed until the next monthly

19   status meeting. The vote occurred on August 23, 2000, at the regular

20   monthly status meeting. The vote was preceded by an introduction by the

21   BellSouth Change Control Manager. The introduction described the joint

22   efforts by BellSouth and the CLECs to develop the CCP and the major

23   improvements that had been accomplished since the meeting in February,

24   2000. Six participants voted to approve the base-line CCP document.

25   Three participants, including Sprint and AT&T, voted "no." One participant

1   abstained. BellSouth did not vote, although the interim CCP entitled it to

2   one vote.   As a result the CCP document of August 23, 2000, became the

3   baseline for the process.

4

5   Q.   DID THE CLECS HAVE ADEQUATE OPPORTUNITY TO PROVIDE

6   INPUT INTO THE CCP?

7

8   A.   Absolutely. The CLECs have "had substantial input in the design and

9   continued operation of the change management process." SWBT Texas

10   Order, ¶108. Indeed, in the Georgia Third-Party Test, KPMG found that

11   BellSouth's "change management process includes procedures for

12   allowing input from all interested parties."(MTP, at CM-1-1-4, p. VIII-A-20,

13   attached to Milton McElroy's testimony as Exhibit MM-3).

14

15 Changes to the Change Control Process

16

17 Q.   HOW ARE CHANGES TO THE CCP BEING HANDLED ON A GOING-

18   FORWARD BASIS?

19

20 A.   Changes to the CCP have also been incorporated in the process.

21   Participants use the change request form that is used for all change

22   requests to submit changes to the CCP. The CCP allows the BellSouth

23   Change Control Manager to make cosmetic changes to the CCP

24   document and then publish the document. All other change requests are

25   discussed during monthly change review status meetings. Not long after it

1   went into effect on August 23, 2000, BellSouth initiated a series of special

2   meetings to discuss changes to the CCP.

3

4 Q.   WHAT PROCESS CHANGES TO THE CCP HAVE BEEN ADDRESSED

5   SINCE ITS IMPLEMENTATION?

6

7 A.   On September 8, 2000, AT&T submitted a change request, CR0171,

8   requesting that the then current CCP document (August 23, 2000) be

9   modified to include the changes outlined in AT&T's annotated version of

10   that CCP document. AT&T attached their annotated version of the CCP

11   document to its change request.

12

13   The CCP formed a subteam to study the "process improvement" of the

14   CCP. The subteam has held several meetings to discuss revising the

15   CCP, and therefore, the CCP document as well. Among the items

16   discussed during the meetings were:

17   • the revision history on Carrier Notifications related to

18   documentation updates/upgrades;

19   • the process for defects/expedites;

20   • the BellSouth Release Management milestones (a schedule or

21   calendar for future releases);

22   • coding changes;

23   • BellSouth's internal process for scheduling prioritized change

24   requests;

- AT&T's suggested changes to the CCP document (provided by AT&T in an annotated version of the CCP document Version 2.0);
- a process for appealing BellSouth's release schedules;
- timeframes for providing the draft and final user requirements that are associated with releases; and
- a process for including requests for changes that are non-OBF standard.

During the meeting on January 10, 2001, CLECS agreed to vote on the proposed changes to the CCP using a written ballot, which AT&T helped to prepare. The results of the vote were announced at the regularly scheduled monthly status meeting on January 31, 2001. A new CCP document incorporating the changes was issued on February 9, 2001 as Version 2.1. To correct documentation errors in Version 2.1, Version 2.1a was issued on February 16, 2001. The CCP participants continued to discuss further proposed changes to the CCP document. Another vote on a second group of proposed changes was taken in March, and as a result, a new "baseline" CCP document was issued on March 26, 2001. The current CCP document, including an overview of the CCP's voting process, is attached as Exhibit OSS-39.

Features of the Current Change Control Process

Q. PLEASE DISCUSS THE FEATURES OF THE CURRENT CCP DOCUMENT.

1

2 A. The FCC has specified that a CCP document should be "clearly organized

3   and readily accessible to CLECs." (BellAtlantic New York Order, ¶107)

4   BellSouth's CCP document (Exhibit OSS-39) meets these criteria. It

5   describes details on the types of changes that are handled, how change

6   requests are classified, the escalation process, the dispute resolution

7   process, and the testing environment. In the Georgia Third-Party Test,

8   KPMG found that CCP documents clearly defined change management

9   process responsibilities. (MTP, at CM-1-1-1, p. VIII-A-15; STP, at CM 2-1-

10   2, p. VII-A-19, attached to Milton McElroy's testimony as Exhibit MM-3).

11

12   In addition to the CCP document, BellSouth provides CLECs with a CCP

13   Web site.

14   (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html)

15   At this site, BellSouth posts information about the processes, including

16   documents, such as the CCP document and forms; status information,

17   including the change control logs, submitted change requests,

18   implemented change requests, and cancelled change requests; and

19   meeting information, including minutes and notices.

20

21 Q. WHAT ARE THE OBJECTIVES OF THE CCP?

22

23 A. The objectives of the CCP are to:

1 • Support the industry guidelines that impact electronic interfaces and

2 manual processes related to order, pre-order, maintenance, and billing

3 as appropriate;

4 • Ensure continuity of business processes and systems operations;

5 • Establish processes for communicating and managing changes;

6 • Allow for mutual impact assessment and resource planning to manage

7 and schedule changes; and

8 • Provide the capability to prioritize requested changes.

9

10 Q. WHAT INTERFACES ARE COVERED BY THE CCP?

11

12 A. Currently the interfaces included in-scope for CCP are LENS, TAG, EDI,

13 TAFI, ECTA, and CSOTS. The manual processes related to order, pre-

14 order, maintenance, and testing are also included.

15

16 Q. WHAT TYPES OF CHANGES DOES THE CURRENT CCP HANDLE?

17

18 A. For the in-scope interfaces listed in the previous answer, the CCP handles

19 the following types of changes:

20 • Software

21 • Hardware

22 • Industry standards

23 • Products and services (that is, new services available via the in-scope

24 interfaces)

25 • New or revised edits

1 • Process (that is, electronic interfaces and manual processes related to

2 order, pre-order, maintenance, and testing)

3 • Regulatory

4 • Documentation (that is, business rules for electronic and manual

5 processes related to order, pre-order, and maintenance, including user

6 guides that support OSS Systems currently within the scope of the

7 CCP)

8 • Defects

9

10 Q. ARE THERE REQUESTS OR ISSUES THAT THE CURRENT CCP

11 DOES NOT HANDLE?

12

13 A. Yes. The CCP does not cover the following: Bona Fide or New Business

14 Requests; production support; contractual agreements; and, collocation.

15 Change requests of this nature will be handled through BellSouth's

16 existing processes. BellSouth's Interconnection Account Teams for

17 CLECs handle contractual agreement issues, Bona Fide Requests, and

18 collocation. The CLECs' Account Teams support the coordination of test

19 agreements. BellSouth's Customer Support Managers for CLECs or

20 Account Teams handle issues related to production support and issue

21 resolution. CLECs should direct questions about existing documentation

22 to their Account Teams. If, however, the documentation needs to be

23 changed, then a defect change request should be submitted to the CCP.

24

1 Q. PLEASE BRIEFLY DESCRIBE HOW A CHANGE PROCEEDS

2   THROUGH THE CCP.

3

4 A. The process by which a proposed change proceeds through the CCP is

5   detailed in the CCP document (Exhibit OSS-39). Under the CCP, all

6   change requests are classified by type. The definitions for each type and

7   the dates and timelines (intervals) associated with each type of change,

8   including the distribution of documentation and business rules, are

9   detailed in the CCP document. The following table summarizes the six

10   types of changes accommodated by the CCP.

11

Type	Name
Type 1	System Outage
Type 2	Regulatory Change
Type 3	Industry Standard Change
Type 4	BellSouth-initiated Change
Type 5	CLEC-initiated Change
Type 6	CLEC-impacting Defects

12   Although they are not categorized specifically in the CCP documents, the

13   six types of changes can be divided into three distinct categories. There

14   are three separate processes that are followed for each category. The

15   following table summarizes the categories.

16

Category	Type	Description
Category 1	Type 1	System totally unusable or degradation in existing feature or functionality
Category 2	Types 2- 5	Change requests for system enhancements, manual and/or business processes, can also include issues for pre-order, orders, maintenance/repair
Category 3	Type 6	CLEC impacting defect in production – system not operating as specified in baseline business requirements or

		published business rules, includes documentation defects

1

Q. WHAT IS BELLSOUTH'S NOTIFICATION POLICY?

A. BellSouth's notification policy is stated on page 25 in the CCP document (Exhibit OSS-39). Notifications for software releases are provided 30 days or more in advance of implementation date. Under the CCP, documentation changes for Business Rules are provided 30 days or more in advance of the implementation date. On November 1, 2000, BellSouth began stating whether a change was related to a system release or a documentation defect in carrier notification letters. A few carrier notification letters posted after November 1, 2000, may not have contained this information because BellSouth was preparing the letters close to, but before November 1. Under the current CCP, notifications to the CLECs of documentation updates (non-system changes) are posted five business days in advance of the documentation posting date. All notification letters for 1997-2001 may be reviewed at the Interconnection Web site. The address for the CLEC Notification Letters posted in 2001 is http://www.interconnection.bellsouth.com/notifications/carrier/carrier_lett_0 1.html. The address for the archive for 1997-2000, is http://www.interconnection.bellsouth.com/notifications/carrier/carrier_lett_a rchives.html. In the Georgia Test, KPMG found that BellSouth "showed significant improvement in BellSouth's record Web posting" of CLEC notification during 2000. (MTP, at CM 1-1-6, p. VII-A-21; STP, at CM 2-1-1, p. VII-A-17, 18 (OSS99 "provided reasonable intervals for considering

and notifying customers about proposed changes.") attached to Milton

McElroy's testimony as Exhibit MM-3)

Q.   HAVE BELLSOUTH'S NOTIFICATION POLICIES BEEN REVISED IN

THE CCP?

A.   Yes. As part of the CCP "process improvement," which I discussed

above, BellSouth and the CLECs discussed changing the deadlines for

the distribution of requirements and documentation related to releases of

the interfaces that are the result of Type 2-5 change requests. These new

deadlines were considered within the context of a proposed

comprehensive release management program that included proposed

schedules for industry releases (new industry standard(s) that may require

the CLECs to make changes to their interfaces), major releases (changes

that may require CLECs to make changes to their interfaces), minor

releases (changes that may not require CLECs to make changes to their

interfaces), and maintenance releases (scheduled maintenance of a

BellSouth system).[6] The CCP participants voted on and approved the

new release management plan in June 2001, and the new plan and

schedules were incorporated into the CCP document. (See Exhibit OSS-

39, Section 4.0.) The CCP now includes the following schedules for

industry and major releases, for example:

Major Releases
- Draft User Requirements for major software releases will be
  provided to CLECs at least 36 weeks prior to production

---

[6] There are no user requirements for maintenance releases.

- Final User Requirements for major software releases will be provided to CLECs at least 34 weeks prior to production
- Final specifications for major software releases will be provided to CLECs at least 10 weeks prior to production
- Business Rules associated with major software releases will be provided to CLECs at least 8 weeks prior to production

Industry Releases
- Notification for the implementation of an Industry release will be provided at least 42 weeks prior to production
- Draft User Requirements for implementation of Industry release will be provided to CLECs at least 40 weeks prior to production
- Final User Requirements for implementation of Industry release will be provided to CLECs at least 10 weeks prior to production
- Final specifications for implementation of Industry release will be provided to CLECs at least 10 weeks prior to production
- Business rules associated with implementation of Industry release will be provided to CLECs at least 8 weeks prior to production

Q. WHAT OTHER TYPES OF NOTIFICATION DOES BELLSOUTH PROVIDE TO CLECS?

A. BellSouth posts Type 1 System Outages and Type 6 defect notices at the CCP Web site, in addition to the items mentioned in the description of the Web site above. Type 1 System Outages are posted at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_so.html. Type 6 defect notices are posted at http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp_t6dn.html. On May 1, 2000, BellSouth also began using a "list manager" to send CCP documentation to CLECs by e-mail. After a CLEC's representative subscribes to the list, the system automatically will send an e-mail containing correspondence related to the CCP to that representative. The e-mail correspondence includes notification and acknowledgement of

1   change requests, notification of System Outages, and notification of

2   defects.

3

4 Q.   IS THE FORMAL NOTIFICATION PROCESS A CLEC'S FIRST NOTICE

5   OF A SOFTWARE CHANGE?

6

7 A.   Long before CLECs are formally notified about changes to the interfaces,

8   the potential changes are first discussed with the participating CLECs

9   during the CCP meetings.

10

11   The change review meeting provides the forum for reviewing and

12   prioritizing pending change requests, generating candidate change

13   requests, submitting candidate change requests for sizing, and reviewing

14   the status of all release projects underway. Status update meetings are

15   held monthly. Prioritization meetings will be scheduled to occur in March,

16   June, September and December and include the monthly status meeting

17   agenda items. Meetings are structured according to category

18   (preorder/order, maintenance, manual and documentation, etc.). During

19   prioritization meetings each candidate change request is presented and

20   the CCP participants vote on the prioritization.

21

22   Once a change has been approved by the CCP, BellSouth will provide the

23   requirements and the technical references to CLECs, as set forth in the

24   release management schedule in the CCP document. Face-to-face

1 meetings and/or conference calls are held by BellSouth and CLECs to

2 discuss the programming and coding details for the changes.

3

4 Q.   WHO IS QUALIFIED TO PROPOSE CHANGES TO THE CCP?

5

6 A.   CLECs registered to participate in the CCP may propose changes to the

7   electronic interfaces. A CLEC must either use an interface or have filed a

8   "letter of intent" to use an interface in order to submit change requests,

9   and to vote and rank potential change(s) for that particular interface. The

10   specific rules for voting are detailed in the CCP document.

11

12 Q.   HOW IS INFORMATION TRACKED IN THE CCP?

13

14 A.   BellSouth tracks change information using the Change Control Log, which

15   was recently expanded to include fields for "target date" and "actual date."

16   (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_ccs_ccl.

17   html) The "target date" reflects the date based on the cycle time for each

18   milestone that the request must meet in the CCP. The "actual date" reflects

19   the date when BellSouth completed the milestone.

20

21 Q.   PLEASE DESCRIBE THE NOTIFICATION PROCESS FOR DEFECTS.

22

23 A.   The CCP also defines a notification process for defects.A defect is any

24   non-Type 1 (System Outage) change that occurs when an interface is not

25   working according to BellSouth's baseline business user requirements or

1		Business Rules, and impacts a CLEC's ability to exchange transactions
2		with BellSouth. This includes defects in the documentation. BellSouth or
3		CLECs may start this defect process by submitting a Type 6 change
4		request. A Type 6 change request is submitted with one of three impact
5		levels. "High Impact" should be used whenever the failure causes
6		impairment to critical system functions and no electronic workaround
7		solution exits. "Medium Impact" is used whenever the failure causes
8		impairment of critical system functions, and a workaround exists. "Low
9		Impact" means that the failure causes inconvenience or annoyance.
10		During the internal validation step for a Type 6 defect, the defect is
11		validated and a clarification notice is sent to the CLEC, if required. The
12		defect notification will be provided to the CLEC via email and web posting.
13		For High Impact defects, a status is provided to the originator via email
14		within 24 hours.
15		In the Georgia Test, KPMG reviewed criteria for the prioritization system
16		and severity coding and found them to be satisfactory. (MTP, at CM-1-1-8,
17		p. VIII-A-22, attached to Milton McElroy's testimony as Exhibit MM-3).
18		
19	Q.	WHAT IS BELLSOUTH'S PROCESS FOR THE HANDLING OF
20		EXPEDITED FEATURES?
21		
22	A.	An expedited feature is worked as the result of the inability for a CLEC to
23		process certain types of LSRs based on the existing functionality of
24		BellSouth's OSS that are in the scope of CCP. The change request for an

1   expedite must provide details of the business impact and will fall into one

2   of two categories:

3   • A submitted defect that has been re-classified (from a Type 6

4   request) as a feature that the CLEC/BellSouth has determined

5   should be expedited due to impact; or

6   • An ordering enhancement to an existing interface that the

7   CLEC/BellSouth has determined should be expedited due to

8   impact.

9

10 Q.   DOES THE CCP HAVE A DISPUTE RESOLUTION MECHANISM?

11

12 A.   Yes. The CCP includes "a procedure for the timely resolution of change

13   management disputes." SWBT Texas Order, ¶ 108. The escalation and

14   dispute processes are described in the CCP document. The ability to

15   escalate is left to the discretion of the CLEC, and is determined by the

16   severity of the missed or unaccepted response or resolution. In the case

17   of change requests, escalations should only occur after normal change

18   control procedures have been completed. There are three levels of

19   escalation, depending on how the issue has been characterized (Types 1-

20   6, as described above). Escalations also can involve issues related to the

21   CCP itself. The levels of escalation, the turnaround times, and the

22   contacts at BellSouth are described in detail in the CCP document on

23   pages 59-62 of Exhibit OSS-39.

24

1   In the event that an issue is not resolved through the escalation process,

2   including (1) escalation within each company to the person with ultimate

3   authority for change control operations, and (2) the services of a joint

4   investigative team, when appropriate, comprised of representatives from

5   BellSouth and the affected CLECs, then resolution of the dispute shall be

6   accomplished by the following means:

7   • Either BellSouth or any CLEC affected by the dispute may request

8   mediation through the State Public Service Commission or

9   Authority, if available. If mediation is requested, the parties shall

10   participate in good faith. If the mediation results in the resolution of

11   the dispute, that resolution shall apply to all CLECs affected by the

12   dispute.

13   • Without the necessity for prior mediation, either BellSouth or any

14   CLEC affected by the dispute may file a formal complaint with the

15   appropriate state regulatory agency, requesting resolution of the

16   issue.

17

18   The Introduction of New Interfaces and the Retirement of Old Interfaces

19

20   Q.   DOES THE CCP INCLUDE INTRODUCTION OF NEW INTERFACES?

21

22   A.   Yes. The CCP incorporates the introduction to the CLECs of new

23   electronic interfaces. This process is described on page 56 of the CCP

24   document. The procedure calls for BellSouth to introduce a proposed

25   interface to CLECs during one of the monthly status meetings of the CCP.

1   During the meeting, BellSouth will provide a 30-45 minute presentation

2   about the proposed interface. If more time is needed, BellSouth will

3   schedule a separate meeting. The objective of the presentation will be to

4   identify interested CLECs and to obtain input from the CLECs. When the

5   new interface is deployed, it will be added to the scope of the CCP, based

6   on use by the CLECs, and any requested changes to it will be managed

7   by the CCP.

8

9   Q. DOES THE CCP INCLUDE THE DEVELOPMENT OF NEW

10   INTERFACES?

11

12 A. No. The development of new electronic interfaces does not come under

13   the CCP because BellSouth must have the flexibility to develop interfaces

14   to meet industry standards and guidelines, and regulatory requirements.

15   The process allows and encourages the CLECs' input, but to ensure

16   efficient and timely deployment of new interfaces, BellSouth retains the

17   responsibility for the development and deployment of them. Thus, the

18   CCP provides BellSouth and CLECs with a meaningful opportunity to

19   discuss new interfaces.

20

21 Q. WHAT IS BELLSOUTH'S POLICY ON THE RETIREMENT OF OLD

22   INTERFACES?

23

24 A. BellSouth will only retire interfaces that CLECs do not use, or are using

25   very little, and for which BellSouth has a replacement that provides equal

1   or better functionality than the retiring interface. Information about the

2   retirement of interfaces is contained in the CCP document (page 56 of

3   Exhibit OSS-39). When BellSouth decides to retire an active interface, it

4   will notify CLECs through the CCP and post a carrier notification letter six

5   months before the retirement date. The CCP gives BellSouth the

6   discretion to provide shorter notification (30-60 days) for inactive

7   interfaces or those that are used very little.BellSouth will ensure that

8   CLECs are able to transition to another interface before the retirement,

9   and that the transition does not negatively impact a CLEC's business.

10

11   BellSouth's "Versioning" Policy

12

13   Q.   PLEASE DESCRIBE BELLSOUTH'S VERSIONING POLICY FOR

14   ELECTRONIC INTERFACES.

15

16   A.   BellSouth's "versioning" policy enables CLECs to transition to newer

17   versions of the EDI or TAG interfaces on a schedule that is convenient for

18   them. The "versioning" policy is contained in Appendix D of the CCP

19   document (Exhibit OSS-39).

20

21   Since August 1998, BellSouth's policy, which is stated in its SGAT and

22   standard interconnection agreement, has been to support two industry

23   standard versions of the applicable electronic interfaces at all times.

24   Currently, the EDI and TAG electronic interfaces are maintained this way,

25   because they are the interfaces that require the CLEC to "build" its side of

1   the interface to use the new standard. Periodically, one of the

2   organizations for industry standards will issue a new or updated set of

3   standards. After submitting the new standards to the CCP to determine

4   how and when they will be implemented, BellSouth will introduce a new

5   version of that interface based on the new standards. BellSouth will keep

6   the "old" version of the interface functioning based on the old industry

7   standards for those CLECs that have not had enough time to build their

8   side of the interface to the new industry standards. BellSouth gives

9   CLECs six (6) months advance notice of the implementation of new

10   versions to the electronic interfaces based on new industry standards.

11

12   The two industry standard versions of an interface are maintained when

13   BellSouth is implementing an entirely new version of an interface based

14   on new industry standards, not when BellSouth is simply enhancing an

15   existing interface (except the fixing of defects, if any). When a new

16   industry standard for the interface is issued, the most recent prior industry

17   standard version of the interface will be frozen - no changes will be made

18   to the old version of the interface. BellSouth will support both the new

19   industry standard version and the old industry standard version until the

20   next set of industry standards is issued. Then, BellSouth will support the

21   two most recent industry standard versions of the interface. For example,

22   in March 1998, BellSouth released a new industry standard version of EDI

23   based on TCIF version 7.0. Between March 1998 and January 2000,

24   BellSouth implemented a series of major releases (4.0 and 5.0) and a

25   series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point

1   release" of EDI was Release 5.8. In January 2000, BellSouth

2   implemented Release 6.0 of EDI (OSS99) based on TCIF 9.0. When this

3   occurred, BellSouth began maintaining Release 5.8 alongside of Release

4   6.0 of EDI.

5

6   Whenever BellSouth retires a version of these interfaces, BellSouth will

7   notify the CLECs 120 days in advance. A CLEC may seek an extension

8   through the CCP by explaining how the retirement date affects its

9   business. This policy is stated on pages 56–77 of the CCP document

10   (Exhibit OSS-39).

11

12   Q.   IS LENS COVERED BY BELLSOUTH'S VERSIONING POLICY?

13

14   A.   No. Because CLECs do not have to do any programming to use LENS,

15   LENS is not covered under the versioning policy. BellSouth nevertheless

16   attempts to make the transition to a new major release as easy as

17   possible for the CLECs using LENS.

18

19   BellSouth's Original Testing Environment for CLECs

20

21   Q.   DESCRIBE BELLSOUTH'S CURRENT TESTING ENVIRONMENT FOR

22   CLECS.

23

24   A.   BellSouth provides CLECs with an open and stable testing environment

25   for the machine-to-machine EDI and TAG interfaces. The testing

1   environment is discussed on pages 66-67 of the CCP document (Exhibit

2   OSS-39). Three CLECs used the testing environment in 1999. As of the

3   end of December 2000, 20 CLECs have used it to test EDI, and 27 CLECs

4   have used it to test TAG. In 2001 thus far, 13 CLECs have used this

5   environment to test EDI, and 17 have used it to test TAG. The fact that so

6   many CLECs have used this testing environment is strong evidence of its

7   success.

8

9   Before making the release of an interface available to CLECs, BellSouth

10 completes internal testing of the release using the same testing

11 environment that the CLECs will use.

12

13 Q.   DOES BELLSOUTH OFFER BETA TESTING TO CLECS?

14

15 A.   Yes. Beta testing is offered to the CLECs that are interested in assisting

16   BellSouth in validating a Telecommunications Industry Forum ("TCIF")

17   change to the affected interfaces. The CLEC submits its requests to

18   participate to its BellSouth Account Team, and negotiates the parameters

19   with the Carrier Testing Group. BellSouth opens the test environment for

20   beta testing for "major releases," such as Release 6.0 (a/k/a., OSS99). If

21   a CLEC is interested in beta testing, it may sign up for testing with the

22   Carrier Testing Group. CLECs test on a first come, first served basis. In

23   the Georgia Test, KPMG found in connection with OSS99 that "carrier-to

24   carrier test environments were stable and segregated from BellSouth

1   production and development environments." (STP, at CM 2-1-7, p. VII-A-

2   24, attached to Milton McElroy's testimony as Exhibit MM-4).

3

4   Q.   DOES BELLSOUTH OFFER NEW CARRIER TESTING?

5

6   A.   Yes. New carrier testing is offered to CLECs that are shifting from a

7   manual to an electronic environment. BellSouth also offers testing to

8   CLECs that are changing from one OBF version of EDI or TAG to another

9   (for example, from Release 5.8 (TCIF 7.0) to Release 6.0 (TCIF 9.0) of

10   EDI). New carrier testing is available to all CLECs and is scheduled with

11   the BellSouth Account Team and the Carrier Testing Group.

12

13   Q.   WHO PROVIDES THE TEST SCENARIOS IN BELLSOUTH'S TESTING

14   ENVIRONMENT?

15

16   A.   BellSouth provides the test scenarios. However, when BellSouth's

17   scenarios do not match a CLEC's business plan, the CLEC may provide

18   the scenarios. After the CLEC has submitted information about the

19   scenarios, BellSouth will supply the data to be used in the test scenarios.

20   Although BellSouth does not monitor the CLECs' test LSRs as they flow

21   through the ordering process, BellSouth can see what the CLECs input

22   and the final results.

23

24   Q.   PLEASE DESCRIBE THE TYPES OF TESTING APPLICABLE TO THE

25   DIFFERENT ELECTRONIC INTERFACES.

1

A.   A CLEC or BellSouth may perform several different phases when testing

the CLEC's interfaces:

- Physical Connectivity Testing – This required phase of testing
  (for LAN users only) verifies that communication is properly
  established and that both parties can send and receive
  electronic messages.

- Application Connectivity Testing – This required phase of testing
  verifies that communication is properly established between
  BellSouth platforms and CLEC/Vendor specified connectivity
  methods such as EDI – VAN or CONNECT:Direct®, and TAG.

- API Testing – This optional phase of testing for CLECs/Vendors
  using TAG allows the CLEC/Vendor to verify its software before
  Application Testing. No test cases are provided and testing will
  be done against the simulator.

- Application Testing – This conditional phase of testing uses a
  simulator and verifies that the mapping of data is correct and the
  CLEC/Vendor software can communicate with BellSouth. This
  phase is required for TAG users when implementing a new
  interface, new TCIF Issue or new product. This phase of testing
  verifies Pre-ordering and Ordering data mapping.

- Syntax Testing – This phase of testing verifies compliance to
  predetermined structures such as ANSI ASC X12 EDI standards
  and TCIF industry standards. This phase of testing is required

1   when implementing a new interface or moving to a new EDI

2   map.

3   • Validity Testing – This phase of testing verifies that the

4   CLEC/Vendor software can execute firm order test cases in

5   compliance with BellSouth's business rules. This phase of

6   testing is required when implementing a new interface, new

7   product, or new TCIF Issue.

8   • Production Verification Testing – This required phase of testing

9   allows BellSouth and CLECs to confirm that transactions flow to

10   the production environment. CLECs are required to submit a

11   production transaction with live data. BellSouth will monitor to

12   ensure that the back-end applications can be accessed.

13   Service provider vendors will be required to submit a production

14   verification test for each CLEC that it adds to its interface.

15   • Service Readiness Testing – This phase of testing applies only

16   if it is included in the CLEC's Interconnection Agreement. This

17   optional phase of testing allows a CLEC to test firm orders end-

18   to-end in production with BellSouth. If a CLEC opts to include

19   service readiness testing in its implementation plan, it must

20   provide a real LSR with live data and allow the firm order to

21   process it. BellSouth will monitor the LSR until an FOC is

22   received. The CLEC may continue with production LSRs.

23   • Functional Testing – This optional phase of testing, conducted

24   in CAVE, allows a CLEC to perform functional testing on pre-

1   production and post-production releases during the specified

2   period. CAVE is discussed below.

3

4   RoboTAG™ is not one of the interfaces tested in the testing environment.

5   BellSouth offers user acceptance testing (UAT) for RoboTAG™. UAT

6   allows the CLECs to submit a defined number of LSRs into production that

7   are tracked through the BellSouth systems and validated.

8

9   BellSouth provides standard test agreements for EDI, TAG, and

10   RoboTAG™ during the testing negotiations with CLECs. These test

11   agreements describe the types of data to be exchange, the number of

12   transactions, and the responsibilities of each party during the test. The

13   agreements can be modified based on the needs of a specific CLEC at the

14   time of negotiations.

15

Testing exhibits	Exhibit numbers
EDI Testing Agreement	OSS-57
TAG Testing Agreement	OSS-58
RoboTAG™ Testing Agreement	OSS-59
CLEC Testing Plan and Guidelines (for EDI)	OSS-60
Testing Plan and Guidelines for TAG and CLECs	OSS-61

16

17 The CLEC Application Verification Environment ("CAVE")

18

19 Q.   DOES BELLSOUTH HAVE A NEW TESTING ENVIRONMENT FOR

20   CLECS?

21

1 A.   Yes. In addition to the testing environment described above, BellSouth

2   has introduced a new test environment called the CLEC Application

3   Verification Environment ("CAVE"). BellSouth announced the general

4   availability of CAVE to the CLECs on April 23, 2001. CAVE mirrors

5   BellSouth's production environment to ensure that new hardware and

6   software releases facilitate successful order flow before the new releases

7   are introduced to the production environment.

8

9   CAVE mirrors BellSouth's production environment to ensure that new

10   hardware and software releases facilitate successful order flow before the

11   new releases are introduced into the production environment. Testing

12   focuses on system functionality. The CAVE environment is comprised of

13   the CLEC interfaces, TAG and EDI , and LEO, LESOG, and the LNP

14   Gateway that mirror the same interfaces and systems in production. In

15   order to simulate the production environment, CAVE also accesses

16   BellSouth's production legacy systems, including the databases for

17   address validation, telephone number selection, service order generation,

18   and product and services selection. Because of this access, CLECs will

19   receive firm order confirmations (FOCs), reject notifications, completion

20   notifications (simulated), clarifications, jeopardy notifications, and

21   functional acknowledgements during the testing of ordering functionality.

22

23 Q.   HAS BELLSOUTH BETA TESTED CAVE WITH A THIRD-PARTY

24   VENDOR FOR THE CLECS?

25

1 A. BellSouth began carrier-to-carrier beta testing of CAVE with a vendor on

2   April 7, 2001, and released CAVE to all CLECs and vendors on April 23,

3   2001.[7] The vendor and BellSouth successfully completed the beta test on

4   April 20, 2001. AT&T, an EDI user, began beta testing CAVE on July 11,

5   2001, and, successfully completed beta testing on August 10, 2001.

6   Please note that CLECs are not required to perform carrier-to-carrier beta

7   testing of CAVE before using it to test releases. In fact, four CLECs or

8   vendors have successfully used CAVE to test release 9.4, which was

9   deployed to production on July 28, 2001. One CLEC is still beta testing

10   CAVE and is scheduled to complete testing on October 5, 2001. Two

11   more have notified BellSouth of their intent to use CAVE. The fact that

12   CLECs have moved quickly to use CAVE is strong evidence of its

13   success. As I describe in more detail below, CLECs may start using

14   CAVE for four weeks before production and may continue using CAVE for

15   four weeks following the production release. In the case of release 9.4,

16   CLECs have had more than two months following production to test this

17   release in CAVE, which is more than what is required.

18

19   CAVE will allow testing of all major releases. BellSouth will determine,

20   based on the functional changes it will make, whether a minor release will

21   be available for testing. BellSouth will announce the testing of minor

22   releases and the timeframes for testing through the CCP's notification

23   process.

24

_____

[7] Some CLECs have contracted with third parties (vendors) to build their machine-to-machine interfaces. These vendors, therefore, will test the interfaces with CAVE on behalf of the CLECs that contracted them. The vendor that is beta testing CAVE with BellSouth provides interfaces for five CLECs.

1   BellSouth has implemented guidelines to support the CLEC's use of

2   CAVE. The BellSouth *Electronic Interface Testing Guidelines* Document,

3   which is attached as Exhibit OSS-65, contains the criteria and procedures

4   for testing the EDI and TAG interfaces with CAVE.

5

6 Q. PLEASE DESCRIBE THE DEVELOPMENT OF CAVE.

7

8 A. As I mentioned earlier, the scope of the CCP also includes changes to the

9   testing process for the CLEC interfaces. In March 2000, AT&T submitted

10   a change request (CR EDI1030300 001) to the CCP to modify the existing

11   testing environment from one that operated in production to an

12   environment that would mirror production. As a result, BellSouth began

13   investigating and pricing a wholly separate, non-production testing

14   environment. On June 28, 2000, the participants at the CCP's

15   prioritization meeting considered AT&T's change request and ranked it as

16   the number one item for ordering that they would like to have in a future

17   release. Through the CCP, the CLECs and BellSouth have collaborated

18   to establish the new testing environment. Because the development of

19   CAVE fell under the CCP, any recommendations, complaints, or questions

20   that the CLECs might have about CAVE during its development would

21   have been submitted through the CCP. The escalation process of the

22   CCP also was available to the CLECs if they had had any disputes with

23   BellSouth responses.

24

1   The testing environment was discussed frequently during the regularly

2   scheduled monthly status meetings of the CCP. The CCP also sponsored

3   meetings on October 31, 2000, and January 17 and 18, 2001, to discuss

4   CAVE and to review the user requirements.

5

6 Q.   IF A CLEC WISHES TO USE CAVE, WHAT STEPS MUST IT FOLLOW?

7

8 A.   In order to participate in CAVE Testing, the CLEC must sign the BellSouth

9   *Electronic Interface Test Agreement* (test agreement), which is attached

10   as Exhibit OSS-66. The test agreement outlines the guidelines and

11   assistance that BellSouth will provide to the CLEC during the test phase.

12   In addition, the CLEC must have profiles to use CAVE. BellSouth will

13   create and assign a CAVE profile to each participating CLEC. The CAVE

14   profile is a test account that contains address, telephone number and

15   other billing information. The CLEC also must schedule testing with

16   BellSouth through the CCP. The start and end dates are incorporated into

17   the test agreement.

18

19   The CLEC provides BellSouth with a list of pre-ordering and ordering

20   scenarios that the CLEC wishes to test in the CAVE environment. CAVE

21   will support all valid requisition and activity combinations that are identified

22   in the *BellSouth Business Rules for Local Ordering* ("BBR") for the

23   application release that the CLEC is testing.[8] The BBR is described above

24   in the "Documentation" section and is attached as Exhibit OSS-9. Using

[8] The BBR is described above in the "Documentation" section and is attached as Exhibit OSS-9.

1   the CLEC's scenarios, BellSouth will prepare the test deck and provide the

2   test deck to CLECs before the commencement of testing.

3

4   Q.   HOW MANY CLECS MAY TEST SIMULTANEOUSLY?

5

6   A.   CAVE has the capacity to allow a maximum of ten CLECs to

7   simultaneously access the CLEC test bed. The CLECs will be allocated

8   slots across all applications.

9

10 Q.   HOW LONG WILL CLECS BE ABLE TO TEST EACH NEW RELEASE IN

11   CAVE?

12

13 A.   As stated above, CAVE provides a 4-week window for testing prior to all

14   major releases, and a 4-week window following the production release.

15

16 Q.   PLEASE DESCRIBE THE CAVE HELP DESK.

17

18 A.   The CAVE Help Desk is the CLECs' primary interface for testing with

19   CAVE. The CAVE Help Desk is available from 8:00 a.m. to 5:00 p.m.,

20   Eastern time, Monday through Friday, excluding BellSouth holidays.

21   Although the CAVE Help Desk is not available outside of the normal hours

22   of operation, CLECs may use CAVE 24 hours a day. The CAVE Help

23   Desk is responsible for the following functions:

24   • Test schedules

25   • Application connectivity testing

1   • EDI/TAG user IDs and passwords

2   • Release management

3   • Telephone-based technical support

4   • Defect management

5

6   Q.   ARE LENS AND ROBOTAG™ INCLUDED IN CAVE?

7

8   A.   No. CAVE tests the application of new software releases for EDI and

9   TAG, which the CLECs must program on their sides of the interfaces.

10   BellSouth performs all of the programming for LENS and RoboTAG™.

11   LENS and RoboTAG™, therefore, were not included in the new test

12   environment.

13

14   Change Management in Practice

15

16   Q.   PLEASE DESCRIBE THE COMMERCIAL USE OF THE CCP.

17

18   A.   The first changes to the EDI and TAG interfaces under the EICCP

19   occurred on November 14, 1998 with Release 4.0 and continued with

20   Release 4.1 on December 19, 1998 and Release 4.2 on February 27,

21   1999. The addition of due date calculation capability to LENS (Release

22   4.0), the addition of pending order status notification to EDI, including

23   service jeopardies (Release 4.1), the addition of Presubscribed

24   Interexchange Carrier (PIC) search capability to LENS (Release 4.1), the

25   addition of automatic telephone number assignment to LENS (Release

4.2), the addition of change order capability to LENS (Release 4.2), and
the addition of fields to EDI and LENS for partial migrations (released on
March 28, 1999) were part of the EICCP. In July 1998, the CLECs
participating in the EICCP began determining which functionality and
features from the Telecommunications Industry Forum ("TCIF") versions
8.0 and 9.0 of the Ordering and Billing Forum ("OBF") standards would be
included in the next major release (sometimes called "OSS99") of EDI
(EDI Release 6.0) and LENS (LENS Release 6.0 or "LENS99"). The first
major release under the interim CCP was Release 7.0 on July 29, 2000.

Attached as Exhibit OSS-40 is a list of the change requests that have
been processed by the CCP, starting with the EICCP and continuing
August 31, 2001.

There are, as of September 6, 2001, a total of 112 change requests
existing in various statuses within the CCP. Of that total, 70 are CLEC-
initiated, and 40 are BellSouth-initiated (3 of which are regulatory
mandates and one of which is an industry-standard change request).
Following is a break down of those change requests.

    34 Requests are in **"New"** Status (30 CLEC, 4 BellSouth)

- 8 are being reviewed for acceptance
- 10 have been reviewed and BellSouth has provided
  reason for inability to support (waiting on CLEC
  response)

- 6 have been reviewed and denied, and are currently in the appeal process
- 7 have been reviewed and CLECs have asked BellSouth to revisit (will be put into appeal process)
- 2 are under investigation by subject matter expert
- 1 is an ongoing request currently being worked within the CCP (CR0171 – Modify CCP Document – Issued by AT&T), and is a subject of the Process Improvement sub-team that has been addressing requested changes to the CCP and the Document since late 2000. Six voting ballots (with a seventh pending) and subsequent CCP Document version updates have resulted, thus far.

1 Request is in **"Pending Clarification"** Status (1 CLEC) – Need additional information from CLEC before review for acceptance.

21 Requests are in **'Pending'** Status (10 CLEC, 7 BellSouth, 3 Regulatory Requests, 1 Industry Change Request) – Will be prioritized by CLECs at next Change Review Meeting.

4 Requests are in **'Pending'** Status (4 CLEC) – With outstanding issues that need resolution before these can be prioritized.

42 Requests are in **'Candidate Request'** Status (25 CLEC, 17 BellSouth) Have been prioritized by CLECs, and are eligible for sizing and sequencing into future releases.

1

2 10 Requests are in **'Scheduled'** Status (2 CLEC, 6 Defect change

3 requests, 2 Regulatory Requests initiated by BellSouth) – Targeted for

4 upcoming releases.

5

6 All requests have received at least an initial response from BellSouth via

7 the CCP, and only 2 responses to requests missed the BellSouth 20-day

8 response interval.

9

10 A change request may be canceled for one of the following reasons: if the

11 originator cancels it, if it is a duplicate, if it concerns training issue, or if the

12 originator fails to respond to a request for clarification. There currently is

13 no process under the CCP to cancel a change request if the originator

14 chooses not do so. If, for example, the CCP requests that an originator

15 cancel a change request that has been rejected by BellSouth, but that the

16 originator has not appealed, and the originator refuses, the change

17 request will remain open indefinitely.

18

19 On March 28, 1999, BellSouth added fields to the EICCP for partial

20 migrations to the TAG interface at the same time it added them to EDI and

21 LENS (see above), and on August 1, 1999, the EICCP began handling

22 changes to the TAG interface. All the changes and enhancements that

23 the EICCP selected for Release 6.0 for EDI and LENS were also

24 implemented in Releases 3.0 and 3.1 of TAG at the same time. New

25 interfaces did not become part of the old EICCP until they had been built

82

1   and used in production by CLECs. This remains the case under the new

2   CCP. This gives CLECs the time to accustom themselves to the new

3   interface and its current functionality before requesting changes to it.

4

5   Performance Measurements for Change Management

6

7   Q.   HAS BELLSOUTH IMPLEMENTED PERFORMANCE MEASUREMENTS

8   TO ALLOW THE AUTHORITY TO ASSESS BELLSOUTH'S

9   PERFORMANCE IN THIS AREA?

10

11   A.   Yes. Performance measurements for change management, including

12   timeliness of change management notices, are reported in the testimony

13   of Alphonso Varner. I will state here, however, that since April 2000,

14   CLECs have issued 244 Types 2-5 (functionality) change requests and

15   191 Type 6 (defect) change requests. Of the 244 Types 2-5 requests,

16   95% were acknowledged within the three-day interval that BellSouth is

17   allowed under the CCP guidelines. BellSouth achieved the 20-day

18   accept/reject interval on 90% of the 244 requests. In the category of Type

19   6 defect requests, BellSouth has three days in which to validate the

20   request as a defect, and to provide a response to the CLEC. Of the 191

21   CLEC Type 6 requests, BellSouth met the 3-day interval 81% of the time,

22   missing on 37 of the requests. However, there were extenuating

23   circumstances. One CLEC issued 19 of the 37 defect requests in ONE

24   day, which was simply too many to validate simultaneously within three

25   days. BellSouth informed the CLEC that the 3-day interval would be

1   missed. Without that anomaly, BellSouth would have achieved a 91%

2   response interval-met rate within this category, and BellSouth believes

3   that this represents a truer picture of performance in this area.

4

5 PRE-ORDERING

6

7 Q.   HOW DOES THE FCC DEFINE "PRE-ORDERING"?

8

9 A.   The FCC's Interconnection Rules (at §51.5) define pre-ordering and

10   ordering collectively as including "the exchange of information between

11   telecommunications carriers about current or proposed customer products

12   and services, or unbundled network elements, or some combination

13   thereof." As the FCC's definition implies, there is no strict delineation

14   between pre-ordering and ordering, as many pre-ordering activities

15   generally occur in the context of negotiating a service request.

16   Nevertheless, pre-ordering typically consists of obtaining access to the

17   following information and functions that a CLEC or BellSouth

18   representative will need while negotiating an order with an end-user

19   customer:

20   • street address validation

21   • telephone number selection

22   • availability of services and features

23   • due date information

24   • customer service record information

25   • loop makeup information

1   In the Georgia Test, KPMG tested all of these pre-ordering functions with

2   the exception of loop makeup. KPMG found all of the test criteria

3   satisfied. (MTP, at IV-A-10 - IV-A-21, attached to Milton McElroy's

4   testimony as Exhibit MM-3). In addition, KPMG conducted functional

5   testing on manual loop makeup and found the test criteria satisfied. (STP,

6   at PO&P 12-2-2; 12-3-1; 12-3-2; 12-4-1, p. IV-B-8 - IV-B-12, attached to

7   Milton McElroy's testimony as Exhibit MM-4). CLECs use electronic

8   access to loop make-up information, and BellSouth will rely on the

9   performance data from that to demonstrate that it provides efficient access

10   to that data.

11

12   In the Second Louisiana Order, the FCC raised a concern that BellSouth

13   did not allow CLECs to integrate their systems with BellSouth's OSS pre-

14   ordering and ordering functions. See id. ¶¶ 96-103. See also South

15   Carolina Order ¶ 158 (noting the lack of a machine to machine interface).

16   As explained further below, BellSouth has fully addressed that issue. The

17   industry-standard, machine-to-machine TAG pre-ordering interface

18   provides CLECs with nondiscriminatory access to OSS pre-ordering

19   functions. Thus, a CLEC may integrate ordering and pre-ordering

20   functions by integrating the TAG pre-ordering interface with the EDI

21   ordering interface, or by integrating the TAG pre-ordering interface with

22   the TAG ordering interface. As stated earlier, it appears that

23   approximately 14 CLECs have integrated the TAG pre-ordering interface

24   with the EDI interface and approximately 30 CLECs have integrated the

25   TAG pre-ordering interface with the TAG ordering interface. Also as

1   mentioned earlier, AT&T, MCI/WorldCom, and ITC^DeltaCom have

2   admitted in state hearings that they have integrated the TAG pre-ordering

3   interface and the EDI ordering interface.

4

5 Q. DOES BELLSOUTH PROVIDE CLECS WITH NONDISCRIMINATORY

6   ACCESS TO THE SAME PRE-ORDERING OSS USED BY

7   BELLSOUTH'S RETAIL REPRESENTATIVES?

8

9 A. Yes. BellSouth provides CLECs with real-time nondiscriminatory access

10   to the same pre-ordering OSS used by BellSouth's retail representatives

11   through the industry-standard, machine-to-machine TAG pre-ordering

12   interface. TAG allows the CLEC to enter a pre-ordering transaction

13   interactively, using prompts and screen displays. The interface converts

14   the CLEC's inputs into support system commands and database queries

15   to obtain the information from the necessary BellSouth OSS, and to return

16   that information to the CLEC on a real-time basis. For each function, TAG

17   accesses exactly the same data as BellSouth's retail marketing and sales

18   support systems. RoboTAG™ has the same functionality as TAG. Unless

19   otherwise noted, all future references to TAG incorporate RoboTAG™.

20

21 Q. DOES BELLSOUTH PROVIDE CLECS WITH A HUMAN-TO-MACHINE

22   PRE-ORDERING INTERFACE?

23

24 A. Yes. BellSouth offers the human-to-machine LENS interface for pre-

25   ordering to CLECs that have chosen not to integrate data obtained from

1   BellSouth with their own internal OSS. LENS gives CLECs the same real-

2   time access to pre-ordering OSS as TAG does for CLECs and as

3   BellSouth's systems do for BellSouth. As discussed earlier, LENS now

4   uses TAG's architecture and gateway. Because LENS is a graphical user

5   interface ("GUI") to TAG, it has essentially the same pre-ordering

6   functionality for resale services and UNEs as TAG does. Using TAG,

7   CLECs can reserve telephone numbers up to 365 days, and LENS users

8   can reserve telephone numbers up to 30 days. The only other differences

9   are demonstrated in the charts herein entitled "Resale Services and UNEs

10   that Flow-Through   EDI, TAG, LENS," and "Resale Services and UNE

11   Transactions electronically, manually handled."

12

13   Q.   ARE CLECS USING BELLSOUTH'S PRE-ORDERING INTERFACES?

14

15   A.   Yes. CLECs are submitting over one million pre-ordering transactions

16   monthly.

17

18   Exhibit OSS-41 demonstrates how TAG pre-ordering interacts with the

19   pre-ordering and ordering OSS when integrated with EDI ordering and

20   with TAG ordering.

21

22   Address Validation

23

24   Q.   DESCRIBE THE ADDRESS VALIDATION PROCESS.

25

1   A.   In order to validate the address, the CLEC service representative, using

2   TAG or LENS, sends an inquiry to, and receives a response from, the

3   Regional Street Address Guide (RSAG) database. RSAG returns address

4   information without regard to whether the request originated from a CLEC

5   or from BellSouth.

6

7   BellSouth provides the end user's address in separate fields during the

8   address validation process in pre-ordering. During address validation,

9   TAG accesses the Regional Street Address Guide ("RSAG") database.

10   The resulting validated address is separated, or parsed, into fields for

11   "675" and "Peachtree" and "Street", rather than "675 Peachtree Street".

12   The fielded address follows the format required by the LSR. The CLEC

13   can populate (or have its integrated pre-ordering and ordering interfaces

14   automatically populate) this information directly in the LSR, and in its own

15   internal OSS, if it chooses.

16

17   If the CLEC has integrated TAG pre-ordering with TAG or EDI ordering,

18   the address obtained from RSAG will be automatically populated on the

19   order forms contained in TAG or EDI ordering.

20

21   BellSouth has one regional master address database only, the RSAG

22   database. When processing an order, BellSouth's OSS uses RSAG to

23   validate the address on the order. There is no possibility of orders falling

24   out or being "disassociated" because of "address mismatches."

25

1   Telephone Number Selection

2

3   Q.   DESCRIBE THE TELEPHONE NUMBER SELECTION PROCESS.

4

5   A.   In order to select a telephone number, the CLEC service representative,

6   using TAG or LENS, sends an inquiry to, and receives a response from,

7   the Application for Telephone Number Load Administration and Selection

8   (ATLAS) database. That system provides telephone number information

9   without regard to whether the request originates from a CLEC or from

10   BellSouth.

11

12   CLECs may reserve up to 25 numbers in a single session via TAG. TAG

13   allows CLECs to reserve telephone numbers without associating them

14   with an LSR. BellSouth service representatives may reserve up to 25

15   telephone numbers with RNS and ROS, but those numbers must be

16   associated with a service request.

17

18   Using TAG, CLECs can select special telephone numbers, such as

19   contiguous numbers, vanity numbers, and easy-to-remember numbers,

20   just as BellSouth retail does. All telephone number inventory

21   management functions are done by ATLAS, whether the telephone

22   numbers are selected by BellSouth or a CLEC.

23

24   Availability of Switch-Based Features and Services

25

1   Q.   CAN CLECS OBTAIN INFORMATION ON THE AVAILABILITY OF

2   SWITCH-BASED FEATURES AND SERVICES?

3

4   A.   Yes. In order to obtain information on the availability of switch-based

5   features and services for the end user's location (central office), the CLEC

6   service representative, using TAG or LENS, sends an inquiry to, and

7   receives a response from, the BellSouth OSS containing switch-based

8   features and services information. The OSS are the Product/Services

9   Inventory Management System (P/SIMS) and the Central Office Features

10   File Interface (COFFI) system. P/SIMS contains feature availability

11   information based on software and hardware capabilities of the central

12   office switches. COFFI provides information on services or features and

13   carrier data, including all tariffed services.

14

15 Obtaining Due Date Information for Installation of Services

16

17 Q.   HOW DO CLECS OBTAIN DUE DATE CALCULATIONS?

18

19 A.   CLEC's obtain due date calculations by initiating either a pre-order or a

20   firm order request that contains the information required to obtain a due

21   date calculation. BellSouth's response to the CLEC provides the due date

22   calculation based upon established timelines governing the provision of

23   the type of service ordered.   The CLEC query is submitted through TAG

24   to the Distributed Support Application ("DSAP") for the specific central

25   office serving that end user customer's telephone number.

1

Q.   HOW ARE ORDER INTERVALS DETERMINED?

3

4   A.   For orders, intervals are determined by standard "business rules" that

5   have been provided to CLECs through industry letters and the BellSouth

6   Products and Services Interval Guide ("Interval Guide"), which contains

7   intervals for resale services, complex services, and UNEs, and is attached

8   as Exhibit OSS-42. Standard intervals apply, for example, when an

9   existing customer is switching from BellSouth to a CLEC, when the

10   customer orders a new service where facilities are already connected

11   through to the customer's premises, or when a customer requests

12   changes such as adding or changing features to existing service. In these

13   instances, CLECs do not need to obtain due dates, but should follow the

14   standard intervals in the Interval Guide.

15

16   The intervals in the Interval Guide are the same intervals used for

17   BellSouth retail customers, except those for UNEs, which BellSouth does

18   not use in its retail operations.

19

20   Q.   DOES BELLSOUTH GUARANTEE OR RESERVE DUE DATES FOR

21   CLECS OR FOR ITS RETAIL UNITS?

22

23   A.   No due date is ever "guaranteed" or "reserved" for CLECs or for

24   BellSouth's retail units. BellSouth uses its best efforts to meet the due

25   dates. Actual fulfillment of due dates can be affected by many things,

1   including the availability of facilities, workforce, and weather. This is true

2   for CLEC services, just as it is for BellSouth retail services.

3

4 Customer Service Record Information

5

6 Q.   DESCRIBE THE MEANS BY WHICH CLECS OBTAIN CUSTOMER

7   SERVICE RECORDS.

8

9 A.   To obtain customer service records (CSRs), CLEC service representatives

10   using TAG access BOCRIS. BOCRIS, which stands for Business Office

11   Customer Records Information System, is a front-end presentation

12   manager which presents customer service record information from CRIS

13   (Customer Record Information System).

14

15   CSRs contain Customer Proprietary Network Information ("CPNI") and

16   information that is proprietary to BellSouth. Access to credit information

17   and other customer proprietary restricted data is controlled by each state's

18   public service commission or authority, Section 222 of the 1996 Act, and

19   the FCC. The chart below lists the information available on the CSR.

20   • Telephone Number or other Account identification

21   • Listed Name

22   • Listed Address

23   • Directory Listing Information

24   • Directory Delivery Information

25   • Billing Name

1   • Billing Address

2   • Service Address

3   • Product and Service Information

4   • PIC

5   • LPIC

6   • BellSouth's retail rates

7   • Credit History for Alabama and Florida

8   • Local Service Itemization (LSI)

9

10   TAG provides CLECs with on-line access to view and print CSR

11   information in substantially the same time and manner as BellSouth

12   service representatives can view and print this information for BellSouth's

13   own retail customers. Using this capability, the CLEC can obtain account

14   information on-line for customers served by resale or by UNEs.

15

16   CSRs for CLECs and BellSouth are updated in the same time and manner

17   - usually 24 hours after an order has been completed.

18

19 Parsing

20

21 Q.   WHAT HAS THE FCC SAID ON PARSING?

22

23 A.   The FCC stated in paragraph 137 of the Bell Atlantic New York Order that

24   "the BOC must enable competing carriers to transfer pre-ordering

25   information electronically to the BOC's ordering interface or to the carriers'

1   own back office systems, which may require "parsing" pre-ordering

2   information into identifiable fields." In footnote 413 of the Texas Order, the

3   FCC confirmed that this statement did not require BOCs' to perform

4   parsing on their side of the interface. BellSouth goes beyond what SBC

5   does by providing a fully-parsed address through RSAG. "… SWBT

6   chose to implement the Concatenated Address Information field in

7   DataGate and in the CSR function of EDI/CORBA. This method is also in

8   accordance with industry standards and reflects the way SWBT provides

9   address information to its retail operations." (Ham Supplemental

10 Testimony ¶ 17). BellSouth, as I described above in the section on

11 address validation, provides CLECs with the information that enables

12 CLECs to parse data to submit LSRs through the ordering interfaces,

13 allows them to parse data into fields for purposes other than creating

14 LSRs, and allows them to integrate the data into their own internal OSS in

15 a nondiscriminatory manner.

16

17 Q.   DO CLECS HAVE THE ABILITY TO PARSE INFORMATION ON THE

18   CSR?

19

20 A.   Yes. BellSouth provides CLECs the ability to parse information on the

21   CSR, using the integrateable machine-to-machine TAG pre-ordering

22   interface. "To parse" is to break down the information contained in the

23   CSR into certain fields from a stream of data received from BellSouth.

24   The TAG gateway transmits the CSR information as a stream of data from

25   BOCRIS, which a CLEC can parse to the same line level using the same

1   unique section identifiers and delimiters that BellSouth does for itself. For

2   example, BellSouth retains the customer's listed name as a complete field

3   - my listed name is "Pate, Ronald M." CLECs have the option to parse

4   CSR information beyond that level. For example, CLECs may want to

5   parse "Pate, Ronald M." into three separate fields: last name ("Pate"), first

6   name ("Ronald"), and middle initial ("M."). This level of parsing could be

7   programmed by the CLECs on their side of the interface. The information

8   for parsing CSRs is contained in the pre-ordering Business Rules for

9   CLECs. See Exhibits OSS-6 through OSS-9. Thus, TAG allows CLECs

10   to parse CSRs in the same way that BellSouth parses CSRs. Exhibit

11   OSS-44 shows CSR data as they are received by the CLEC, and Exhibit

12   OSS-43 shows CSR data as they are displayed by RoboTAG™. BellSouth

13   uses RoboTAG™ to demonstrate TAG.

14

15 Q.   DOES BELLSOUTH PROVIDE SUFFICIENT FUNCTIONALITY FOR

16   PARSED CSR DATA?

17

18 A.   AT&T has argued that BellSouth does not provide CLECs with sufficient

19   functionality with respect to parsed CSR data. Specifically, AT&T argued

20   that BellSouth does not provide CLECs with CSR data that contains

21   delimiters, or with the business rules by which BellSouth applies the

22   delimiters. AT&T also argued that the size and format of certain fields in

23   the CLEC ordering interfaces that BellSouth has adopted are not

24   compatible with the size and format of the data obtained from CSRs.

25   Consequently, AT&T argues, CLECs cannot populate orders with parsed

1 CSR data obtained during pre-ordering. But as stated above, BellSouth

2 provides CLECs with CSR data that are parsed to the same extent as they

3 are received by BellSouth's own interfaces. This nondiscriminatory

4 access complies with the FCC's parsing requirements.

5

6 In any event, as discussed above, the fact that other CLECs are

7 successfully integrating their operations is clear evidence that the parsed

8 CSR data provided by BellSouth is sufficient. If AT&T is having problems

9 with integration, the fault does not lie with BellSouth. See Texas Order ¶

10 154.

11

12 Q. IS PARSING BEING CONSIDERED IN THE CCP?

13

14 A. Yes. As part of the Change Control Process, BellSouth is currently

15 working with a sub-team that includes representatives from BellSouth and

16 the CLECs in order to deliver further parsing of this information. The sub-

17 team began meeting in October 2000 to develop the requirements and

18 have continued to meet in 2001. The implementation of parsing is

19 planned for the fourth quarter of 2001.[9] In addition, BellSouth has

20 developed a *"CSR Job Aid"* (Exhibit OSS-62) and a *"Pre-Order to Firm*

21 *Order Mapping Matrix"* (Exhibit OSS-63). The CCP distributed these

22 documents, in draft form, on February 19, 2001. The final versions were

23 posted on the Interconnection Website on March 30, 2001. The CLECs

24 received draft user requirements for further parsing on September 7,

---

[9] The implementation is currently targeted for December 8, 2001 for CAVE testing and January 5, 2002 for production. The Georgia Public Service Commission has ordered that BellSouth implement this by January 5, 2002.

1   2001. Again, the further parsing of data that BellSouth has undertaken is

2   above and beyond what the FCC requires.

3

4   Q.   PLEASE SUMMARIZE YOUR TESTIMONY ON PRE-ORDERING.

5

6   A.   In summary, BellSouth provides CLECs with CSR data that is parsed to

7   the same extent as it is received by BellSouth's own interfaces. As I

8   stated earlier, BellSouth has knowledge that 14 CLECs have integrated

9   the TAG pre-ordering interface with the EDI interface and 30 CLECs have

10   integrated TAG pre-ordering with TAG ordering. As I described above in

11   the section on address validation, when a CLEC has integrated its TAG

12   pre-ordering with TAG ordering or EDI ordering, the parsed address

13   information obtained from RSAG will be seamlessly transferred from the

14   pre-ordering to the ordering stage. BellSouth has enabled CLECs to

15   transfer pre-ordering information electronically to the ordering interface, or

16   to their back office systems as required by the FCC's New York and Texas

17   Orders.

18

19   Loop Makeup Information

20

21   Q.   WHAT HAS THE FCC HELD WITH RESPECT TO LOOP MAKEUP

22   INFORMATION?

23

24   A.   The FCC's Interconnection Rules (at §51.5) define pre-ordering and

25   ordering collectively as including "the exchange of information between

1   telecommunications carriers about current or proposed customer products

2   and services, or unbundled network elements, or some combination

3   thereof." In addition, the FCC's Interconnection Rules (at 51.319(g)) state

4   that "[a]n incumbent LEC, as part of its duty to provide access to the pre-

5   ordering function, must provide the requesting carrier with

6   nondiscriminatory access to the same detailed information about the loop

7   that is available to the incumbent LEC." BellSouth provides CLECs with

8   the same detailed information about the loop that is available to BellSouth.

9

10 Q.   DOES BELLSOUTH PROVIDE ELECTRONIC ACCESS TO LOOP

11   MAKEUP INFORMATION?

12

13 A.   In the summer of 2000, BellSouth enhanced the TAG and LENS pre-

14   ordering interfaces to provide CLECs with electronic access to the loop

15   makeup information that is contained in the Loop Facilities Assignment

16   and Control System ("LFACS"). On February 12, 2001, BellSouth

17   enhanced RoboTAG™ to provide CLECs with electronic access to loop

18   makeup information. This access provides CLECs with the loop makeup

19   information that they may use to qualify loops for the high speed services

20   they choose to offer, including ADSL and HDSL.

21

22   Using this functionality in TAG, LENS, or RoboTAG™, CLECs can request

23   loop makeup information on existing facilities that are owned by the

24   requesting CLEC or BellSouth, on new or spare facilities that are owned

25   by BellSouth, and create and cancel reservations for new or spare

1   facilities owned by BellSouth. The BellSouth *Loop Makeup CLEC*

2   *Information Package* (Exhibit OSS-26) provides CLECs with a general

3   description of the manual and electronic processes for obtaining loop

4   makeup information. More specific information about electronic loop

5   makeup is contained in the *D/CLEC Pre-Ordering and Ordering Guide for*

6   *Electronic Loop Makeup* (Exhibit OSS-68).

7

8 Q. WHAT LOOP MAKEUP INFORMATION DOES BELLSOUTH MAKE

9   AVAILABLE?

10

11 A. The following list of loop makeup information is currently available to

12   CLECs through the TAG and LENS interfaces when populated in the

13   LFACS database:

14   • Cable and Pair

15   • Loop Status (SP, WKG, CT, CF, etc.)

16   • Loop Length by Segment

17   • CLLI Code of Remote Terminal

18   • Length by Gauge

19   • 26 gauge equivalent loop length

20   • Quantity of load coils

21   • Location of load coils

22   • Quantity of bridged taps

23   • Location of bridged tap by occurrence

24   • Length of bridged taps by occurrence

25   • Location of pair gain/DLC – address of remote terminal

1   • System type of DLC

2   • Source of data - actual

3   • Presence of DAML (Single Subscriber Carrier Indicator)

4   • Loop medium (copper or fiber)

5   • Length that is copper or fiber

6   • Type of Plant (aerial, buried, or underground)

7   • Availability of spare facilities

8   • Number of gauge changes

9   • Assignable binding post

10   • Loop makeup status

11   • Build Out Capacity, Resistance, and Offset

12   • Resistance Zone (RZ)

13   • Carrier Zone (CZ)

14   • Remote Terminal CLLI Code

15   • Telemetry Indicator

16   • Line Terminal Status

17   • ONU Type (Optical Network Unit)

18   • Load coil type

19

20 Q. IS LOOP MAKEUP INFORMATION AVAILABLE TO CLECS IF IT HAS

21   NOT YET BEEN ENTERED INTO IN LFACS?

22

23 A. Yes. In some instances, some of the LMU information listed above may

24   not be entered in the LFACS database. In those instances, if a CLEC

25   should determine that it needs additional information that is not available

1   electronically, the CLEC would submit a manual LMU request. Similarly

2   for BellSouth to serve its own customers, BellSouth must submit a manual

3   service inquiry to obtain facility information for the requested retail

4   service/product when the data is not available electronically.

5

6   Personnel in BellSouth's Outside Plant Engineering department must then

7   utilize a combination of Engineering Work Orders, field visits and plats that

8   contain records of BellSouth's Outside Plant Facilities to develop the LMU.

9   The Outside Plant Facility information resides in the Corporate Facilities

10   Database ("CFD"), a digitized version of the plats, in Georgia, North

11   Carolina, South Carolina, Florida and thirteen (13) wire centers in

12   Alabama. In the remaining BellSouth states and wire centers, this data is

13   stored on manual or paper plats. Regardless of how the plats are

14   maintained, when insufficient data resides in LFACS for a CLEC to qualify

15   a loop, and thus BellSouth obtains data from the plats (via CFD or paper

16   plats), the LMU information that has been generated is populated in

17   LFACS. This service inquiry process is accomplished in substantially the

18   same time and manner (whether retrieved from CFD or paper plats) as

19   would be a similar request (manual service inquiry) for a BellSouth

20   customer as part of the order and provisioning process. Thus, CLECs are

21   not at a disadvantage when compared to BellSouth's retail operations.

22

23   In other state 271 proceedings, the CLECs claim that the manual LMU

24   request increases the standard interval for obtaining LMU information by

25   three days. However, the CLEC's witness offered no supportive evidence

1   to substantiate the claim that the standard interval for handling the manual

2   LMU request is excessive. More important, for the period June 1, 2001 to

3   September 17, 2001, CLECs throughout the BellSouth region submitted

4   831 manual LMU inquiries. Ninety-six percent (96%) of these inquiries

5   were returned within three days. Eighty-five percent (85%) of these

6   requests were returned on either day zero (day of receipt) or day one.

7

8   Q.   HOW DO CLECS REQUEST LOOP MAKEUP INFORMATION?

9

10   A.   CLECs may request LMU information using a telephone number or a

11   circuit ID. In response, CLECs are provided with information on that

12   particular loop. In addition, CLECs may request LMU information on

13   spare facilities that serve the end user. CLECs may request information

14   on one to ten loops per transaction. If the CLEC request that the loop or

15   loops meet certain specifications, BellSouth will return information on the

16   loop or loops that meet those specifications. If the CLEC does not make

17   such a request, BellSouth returns information on the spare loop or loops

18   that would support POTS.

19

20   Q.   DO CLECS HAVE ACCESS TO AN ADEQUATE DATA SOURCE FOR

21   LOOP MAKEUP INFORMATION?

22

23   A.   Yes. In other state 271 proceedings throughout the BellSouth region, the

24   CLECs, specifically Sprint, allege that the LFACS database is an

25   inadequate LMU data source because all BellSouth locations are not

completely loaded into LFACS. The CLECs further claim that early in

2001 only 41% of loops with detailed LMU information were populated in

LFACS. While 100% of BellSouth's loops are populated in LFACS, with

certain basic information, not all will have the detailed LMU information

necessary to qualify a loop. However, and more importantly, the LMU

information available to CLECs in LFACS is the same LMU information

available to BellSouth.

Historically, BellSouth has populated detailed LMU in LFACS based upon

anticipated requests for its designed services that require special

engineering and provisioning, and that are often served by more than one

central office or wire center. Because there was previously no need for

detailed LMU information on non-designed services that required no

special provisioning and that were served by one central office, BellSouth

had not populated LFACS with detailed LMU information for these loops.

It is estimated that as much as 85% of loops with detailed LMU

information are populated in LFACS in some major metropolitan areas,

where the marketing efforts of CLECs are most concentrated. At the

beginning of 2001, 41% of the total cable pairs had LMU data populated in

LFACS region-wide. As of August 2001, that number is up to 50%. To

put this in perspective, LMU information was populated on over 14.9

million cable pairs in LFACS in order for BellSouth to improve from 41% to

50% in this short time period. This effort was accomplished in part when

BellSouth made modifications to its systems that compiled all relevant

1 LMU data in the Corporate Facilities Database ("CFD"), by wire center, on

2 a bulk basis for automatic update to the LFACS database, as will be

3 described below.

4

5 BellSouth is continuously updating and/or populating LMU data in LFACS

6 as Engineering Work Orders are issued. Each time the manual service

7 inquiry process is used, BellSouth loads the resulting LMU information into

8 LFACS for future queries. Thus, the LFACS database improves on a daily

9 basis, and will continue to do so.

10

11 As stated above, BellSouth has recently made modifications to its systems

12 that will compile relevant LMU data contained in the CFD, by wire center,

13 on a bulk basis for automatic update to the LFACS database. This

14 process was completed for all collocation wire centers on July 18, 2001

15 and for all other wire centers on August 13, 2001. All LMU data that is

16 mechanically generated in the CFD was automatically populated in

17 LFACS at that time.

18

19 Further, in late September BellSouth implemented an enhancement that

20 provides for an electronic query from LFACS to the CFD for loop

21 qualification information. As a result of this enhancement, when a CLEC

22 sends an electronic query to LFACS for loop qualification information, and

23 all of the necessary information is not resident in LFACS, an electronic

24 query will be automatically launched to the CFD to generate the required

25 additional information. This additional loop qualification information

1   resulting from the queried CFD will automatically be combined with the

2   LFACS information and provided to the CLEC. Also, the information

3   obtained from the query to the CFD will be populated in the LFACS

4   database and thus, will be available going forward for future electronic

5   loop qualification information queries.

6

7 Q.   IS ACCESS TO CFD REQUIRED TO OBTAIN THE ASSIGNMENT

8   INFORMATION TO QUALIFY A LOOP?

9

10 A.   No. In other state 271 proceedings, CLECS have claimed that BellSouth

11   should be required to provide CLECs access to the CFD. First, the

12   assignment information that is required for loop qualification is located in

13   LFACS, and is not located in the CFD or the paper plats. A loop cannot

14   be qualified through the CFD or the paper plats, therefore, direct access to

15   the CFD is unnecessary for the provision of nondiscriminatory access to

16   LMU information. Second, the CFD contains BellSouth's proprietary

17   network information as well as certain information regarding BellSouth's

18   end user customers. For example, the CFD provides detailed information

19   on the exact location of cables serving military installations and financial

20   institutions as well as police, fire, disaster recovery, and FAA locations,

21   among others. Thus, the release of this information raises concerns not

22   only about customer proprietary data, but also sensitive state and national

23   security information. So, as explained herein, the information required for

24   loop qualification is currently provided to the CLECs on a non-

25   discriminatory basis without jeopardizing the integrity of BellSouth's

1   proprietary data. Therefore, direct access to the CFD is unnecessary to

2   accomplish such nondiscriminatory access. In summary, BellSouth is

3   providing the CLECs with the same detailed information about the loop

4   that is available to BellSouth, as required by the FCC's Interconnection

5   Rules (at 51.319(g)), and the enhancements described above emphasize

6   BellSouth's commitment to continue to improve the processes by which

7   that information is provided.

8

9   The CLECs cite the North Carolina Utilities Commission's Recommended

10   Order in Docket No. P-100, Sub 133d, at page 10 ("NCUC Order"), to

11   assert that BellSouth is not providing non-discriminatory access to loop

12   qualification (LMU) information, and as evidence that BellSouth should be

13   required to provide access to the CFD. BellSouth disagrees with the

14   findings of the NCUC Order that directed BellSouth to permit CLECs to

15   access directly BellSouth's Corporate Facilities Database, and has

16   submitted Exceptions to the NCUC (BellSouth's Exceptions to

17   Recommended Order filed July 6, 2001, Docket No. P-100, Sub 133d, at

18   p. 7), requesting this conclusion be modified. Based upon the explanation

19   provided herein, BellSouth is hopeful that the NCUC will agree with its

20   reasonable modification to the NCUC UNE Order to allow BellSouth to

21   make LFACS and LQS – or a functionally equivalent electronic system –

22   available to CLECs on a permanent basis. (BellSouth's Exceptions to

23   Recommended Order filed July 6, 2001, Docket No. P-100, Sub 133d, at

24   p. 7). This modification will allow BellSouth the flexibility to upgrade,

1   update or even replace, its electronic systems and platforms as it

2   recognizes changes in requirements or technology.

3

4   The CLECs further cite the NCUC Order as evidence that BellSouth

5   personnel have internal sources for LMU information that are not available

6   to the CLECs. As corroborated in this testimony, BellSouth has no

7   relevant information for LMU that is not provided to the CLECs. BellSouth

8   is providing CLECs with the same detailed information about the loop that

9   is available to BellSouth, as required by the FCC.

10

11   Q.   DID BELLSOUTH BETA TEST ELECTRONIC ACCESS TO LOOP

12   MAKEUP INFORMATION?

13

14   A.   On July 29, 2000, when BellSouth released the functionality for electronic

15   access to loop makeup information, interested CLECs were contacted in

16   order to beta test the functionality before the general release into the

17   production environment. Five CLECs signed agreements to beta test the

18   loop makeup functionality and the ordering of xDSL compatible loops and

19   UCLs, but four actually participated in the test. Please see my discussion

20   of the beta test in the section below on ordering xDSL compatible loops

21   and UCLs. After correcting defects found during beta testing, BellSouth

22   released the loop makeup inquiry functionality to all CLECs on November

23   18, 2000.

24

25   Q.   ARE CLECS USING THE ELECTRONIC ACCESS TO LOOP MAKEUP?

1

2 A.   Yes. In December 2000, BellSouth began tracking the usage by CLECs

3   of access to electronic loop makeup information.

4

Month	Total queries for electronic LMU	% within 5 minutes	% Within 1 Minute
Dec-00	1368	99.78%	N/A
Jan-01	2285	99.87%	N/A
Feb-01	4283	99.95%	N/A
Mar-01	4841	100%	N/A
Apr-01	4565	100%	96.3%
May-01	3685	100%	98.7%
Jun-01	5006	100%	99.2%
Jul-01	5290	100%	98.7%
Aug-01	5182	100%	99.75

5

6 Q.   WHAT IS BELLSOUTH'S LOOP QUALIFICATION SYSTEM?

7

8 A.   In addition to providing electronic access to LFACS information to CLECs,

9   BellSouth also offers its Loop Qualification System ("LQS") to Network

10   Service Providers ("NSPs") which they may use to determine if basic local

11   exchange lines will carry BellSouth's industrial or business class ADSL

12   service. CLECs also have electronic access to LQS, which they may use

13   to obtain a qualified "yes/no" response based on defined technical

14   parameters of BellSouth's industrial and business class ADSL offerings.

15   The "yes/no" response allows the CLEC to determine if a telephone

16   number(s) at a specific address is qualified (served by a loop that will

17   support ADSL service) for BellSouth's ADSL service. For each telephone

18   number or address entered, LQS will provide a number of positive

19   responses and reason codes. A complete listing of the external and

1   internal reason codes can be found in the *Loop Qualification System*

2   *(LQS) DLEC/CLEC Job Aid*, which is available on BellSouth's

3   Interconnection Web site

4   (Http://www.interconnection.bellsouth.com/guides/html/bpobr.html).

5   DLECs are a subset of CLECs that offer products to the high speed data

6   communications market segment.   Among the responses are the

7   following:

8

9   "A" (Available) - "Loop is currently qualified for ADSL".

10

11   "P" (Planned) - "Loop is currently not qualified, but is projected to support

12   ADSL"; a projected service date is also provided with the "P" response.

13

14   "N" (Not Qualified for ADSL) - "Loop is not qualified for ADSL". Reason

15   codes are also provided with the "N" response, including: E1 - "Syntax

16   error in phone number"; E2 - "Service not available for this phone

17   number"; E6 - "Loop is not found. Please try again 24 hours later"; The

18   E2 code also applies when the entered number is not a basic local

19   exchange Number (including an ISDN number or a number on which

20   ADSL has already been implemented). The E6 code applies when the

21   entered number is a newly-established BASIC LOCAL EXCHANGE

22   service. LQS then searches BellSouth records, overnight, for this number.

23   If the new number is found, it is then included in the LQS database.

24

1   Upon written request to BellSouth, a registered CLEC will be provided

2   access to LQS. CLECs may access LQS data either in bulk via a Web

3   interface request or via a real-time CORBA (Common Object Request

4   Broker Architecture) interface.

5

6   Q. DOES BELLSOUTH OFFER LOOP MAKEUP INFORMATION

7   MANUALLY?

8

9   A. Yes. If a CLEC determines that it needs additional information that is not

10   available electronically, the CLEC can request a manual loop makeup

11   request.

12   In addition, for the guaranteed-speed xDSL wholesale services that it

13   offers to its wholesale customers (Network Service Providers or "NSPs"),

14   BellSouth provides loop makeup information through a manual service

15   inquiry process. BellSouth provides loop makeup information to CLECs

16   through a manual service inquiry process in substantially the same time

17   and manner as it does for NSPs.

18

19 Performance Measurements for Pre-Ordering

20

21 Q. HAS BELLSOUTH IMPLEMENTED PERFORMANCE MEASURES FOR

22   PRE-ORDERING?

23

1 A. Yes, as is further described in the testimony of Alphonso Varner in this

2   docket, BellSouth has implemented pre-ordering performance

3   measurements.

4

5 ORDERING

6

7 Q. HOW DOES THE FCC ADDRESS ORDERING FUNCTIONS?

8

9 A. As stated in the pre-ordering section, the FCC's Interconnection Rules (at

10   §51.5) define pre-ordering and ordering collectively as including "the

11   exchange of information between telecommunications carriers about

12   current or proposed customer products and services or unbundled

13   network elements or some combination thereof."

14

15 Q. HOW DOES BELLSOUTH PROVIDE CLECS WITH

16   NONDISCRIMINATORY ACCESS TO ORDERING OSS?

17

18 A. BellSouth provides CLECs with nondiscriminatory access to ordering OSS

19   through three nondiscriminatory electronic interfaces: EDI, TAG (and

20   RoboTAG™), and LENS. EDI follows the industry protocol (EDI) for

21   ordering and the OBF guidelines for LSRs. The TAG and LENS interfaces

22   also follow the same OBF guidelines for LSRs. The chart below shows

23   the number of OCNs using the ordering interfaces.[10]

---

[10]Again, the term Operating Carrier Number ("OCN") is used instead of CLEC when making reference to a horizontal line of data represented on the flow-through report. This is because each line of data represents an OCN and some CLECs have multiple OCNs. Thus, on the flow-through report two or more OCNs may represent a CLEC's total data.

1

	EDI	TAG	LENS
Aug-00	21	39	224
Sep-00	18	39	224
Oct-00	20	46	236
Nov-00	20	49	225
Dec-00	26	65	280
Jan-01	26	71	295
Feb-01	36	65	287
Mar-01	32	59	281
Apr-01	38	55	306
May-01	37	63	330
Jun-01	37	70	331
Jul-01	35	60	337
Aug-01	40	72	352

2

3   In 2000, 3,116,811 LSRs were sent electronically by CLECs. Through

4   August 2001, CLECs have electronically sent 3,529,587 LSRs region-

5   wide. The use of electronic interfaces over manual has increased steadily,

6   as CLECs have realized the benefits of electronic submission of LSRs. In

7   August 2001, CLECs electronically submitted approximately 90 percent of

8   their LSRs. BellSouth expects the usage of the electronic interfaces to

9   continue to increase, although some services will continue to be ordered

10 manually, just as they are for BellSouth. Attached is Exhibit OSS-45,

11 which includes a graphical representation demonstrating the increased

12 use of electronic interfaces for ordering. Below is a chart showing the

13 number of LSRs sent through electronic interfaces. These numbers do

14 not include LNP.

15

	EDI	TAG	LENS	TOTAL
Aug-00	11,740	95,900	184,103	291,743
Sep-00	9,786	77,647	168,948	256,381
Oct-00	12,335	125,914	186,785	325,034
Nov-00	14,887	97,622	170,128	282,637
Dec-00	12,838	91,643	168,305	272,786
Jan-01	19,036	58,854	194,224	272,114
Feb-01	27,535	39,381	188,546	255,162
Mar-01	33,697	56,457	200,929	291,083
Apr-01	43,688	40,395	167,933	252,016
May-01	57,717	51,698	245,877	355,292
Jun-01	61,313	47,859	215,175	324,347
Jul-01	70,602	47,048	239,417	357,067
Aug-01	74,628	56,696	251,759	383,083

2 Q.   WHAT FUNCTIONS CAN CLECS PERFORM USING EDI, TAG OR

3   LENS?

5 A.   The EDI, TAG, and LENS interfaces enable CLECs to perform

6   conversions, new connects, changes of service, disconnects, and

7   suspends. CLECs can perform what are frequently referred to as "adds,

8   moves, and changes." When a CLEC requests a new line at an address

9   with existing service, that is considered to be an "add." A "move" occurs

10   when a CLEC requests services for an end user, but at a different

11   location. When a CLEC requests the addition or removal of features at an

12   address with existing service, that is called a "change." CLECs may use

13   EDI, TAG, or LENS to cancel an LSR in error without having to correct the

14   LSR before canceling. A firm order confirmation ("FOC") will then be

15   returned to the CLEC confirming the cancellation. BellSouth thus provides

16   CLECs with nondiscriminatory access to these functions.

1   BellSouth's interfaces allow CLECs to submit LSRs for line sharing using

2   all valid activity and requisition types. This is contrary to complaints made

3   by Covad in other state 271 proceedings.

4

5   If a CLEC orders a resale service through EDI, TAG, or LENS (or

6   manually), Directory Assistance and Operator Assistance are included as

7   part of the resale service. No further ordering of these services is

8   required.

9

10   Stand-alone directory listings may be ordered electronically through EDI,

11   TAG, or LENS (Request Type J or "REQTYPE J"). CLECs using EDI and

12   TAG may request listings with up to six (6) degrees of indention and

13   captions. The business rules for ordering directory listings are located in

14   the *BellSouth Business Rules* ("BBR"). For TCIF 7.0 interfaces, the

15   Business Rules are contained in the *Local Exchange Ordering*

16   *Implementation Guide* ("LEO Guide").

17

18   Partial Migrations

19

20   Q.   CAN CLECS ORDER INITIAL AND SUBSEQUENT PARTIAL

21   MIGRATIONS ELECTRONICALLY?

22

23   A.   Yes. CLECs may order electronically both initial and subsequent partial

24   migrations. Initial partial migrations, occasionally called "split accounts,"

25   occur when an end user customer chooses a CLEC to provide service for

1   some of its lines, while keeping BellSouth as the carrier for other lines.

2   CLECs have been able to send LSRs for resale or UNE initial partial

3   migrations since BellSouth implemented EDI in December 1996. CLECs

4   have been able to send LSRs for initial partial migrations via TAG since

5   the TAG ordering interface was released on November 1, 1998.

6

7   Subsequent partial migrations occur when the end user customer later

8   decides to transfer more or all of its lines to its existing CLEC carrier.

9   Originally, all subsequent partial migrations had to be requested manually,

10   rather than through an electronic interface. On March 28, 1999, as a

11   result of requests by CLECs participating in the Electronic Interface

12   Change Control Process ("EICCP"), BellSouth implemented four new

13   telephone and account number fields (ATN, AN, EAN, and EATN) in EDI,

14   TAG, and LENS. These fields were added to assist CLECs with the

15   electronic ordering of initial partial migrations and subsequent partial

16   migrations. The ATN, AN, EAN, and EATN fields allow CLECs to advise

17   where telephone numbers are migrating to and from. ATN is the Account

18   Telephone Number (dialable) to which lines are migrating. AN is the

19   Account Number (non-dialable) to which the lines are migrating. EATN is

20   the Existing Account Telephone Number (dialable) where the lines

21   currently exist. EAN is the Existing Account Number (non-dialable) where

22   the lines currently exist. The four fields are part of the OBF/TCIF Version

23   8 standards for ordering. These fields, however, were implemented by

24   BellSouth on March 28, 1999, far in advance of the implementation of the

25   rest of Version 8, which occurred on January 14, 2000.

1

2   On January 14, 2000, BellSouth added two new activity types: "P" for

3   initial partial migrations and "Q" for subsequent partial migrations. These

4   new activity types allow CLECs to move one or more lines by initial or

5   subsequent partial migration. CLECs also are able to issue an LSR for a

6   partial migration "as specified."

7

8   Ordering UNEs, including UNE-P and other Combinations

9

10   Q.   CAN CLECS ORDER UNES, INCLUDING COMBINATIONS,

11   ELECTRONICALLY?

12

13   A.   Yes. A loop-port combination, sometimes called the "UNE Platform" or

14   "UNE-P," is a two-wire voice grade port and voice grade loop UNE

15   combination. This offering combines a two-wire voice grade (measured)

16   port, switching functionality, shared interoffice transport, tandem switching,

17   and a voice grade loop (designed or non-designed) to create an end user-

18   to-end user transmission path that provides basic local exchange service.

19   The UNE-P first became available with flow-through for AT&T in Kentucky

20   in March 1998. In February 1999, BellSouth implemented UNE-P with

21   electronic ordering and flow-through for all CLECs. CLECs can use EDI,

22   TAG, or LENS to order UNE-P.

23

24   The pre-ordering, ordering, and provisioning steps for UNE-P are

25   demonstrated in Exhibit OSS-46. If the CLEC is ordering UNE-P for a

1   new end user customer, then the CLEC must validate the address and

2   reserve a telephone number.

3

4   Exhibit OSS-46 also contains a detailed description of pre-ordering,

5   ordering, and provisioning of unbundled loops (SL1, which are non-

6   designed, and SL2, which are designed).

7

8   BellSouth's current process for provisioning UNE-P uses two orders, a

9   Disconnect ("D") order and a New ("N") order. In state hearings, CLECs,

10 particularly MCI/WorldCom, have complained that BellSouth must be

11 required to provision UNE-P with a single order, which is called the "single

12 'C' order," in order to provide nondiscriminatory access. BellSouth

13 believes that its current process provides nondiscriminatory access.

14 Please see the Testimony of Ken Ainsworth for more information on

15 BellSouth's handling of N and D orders. In addition, the FCC has found

16 that multi-order processes can provide nondiscriminatory access.[11]

17 BellSouth, however, currently is developing requirements to move to a

18 conversion process for UNE-P that uses a single "C" order. The Louisiana

19 Public Service Commission has ordered BellSouth to implement the

20 "single 'C' order" by April 1, 2002, per its order (Docket No. U-22252 (E)).

21 (App. C – LA, Tab 23). The Georgia Public Service Commission,

22 however, on October 2, 2001, ordered BellSouth to implement the "single

23 'C' order" by January 5, 2002.

24

---

[11] See Texas Order, ¶¶ 198-200.

1   In other state 271 proceedings, CLECs have complained that BellSouth

2   does not provide an ordering process that is sometimes called "TN

3   (telephone number) migration." This process allows UNE-P conversion

4   with a reduced number of error checks by the electronic systems. Instead

5   of checking the end user's address *and* the telephone number on the LSR,

6   the systems just check the telephone number. "TN migration" is a

7   misnomer, because CLECs still must submit a complete LSR, including

8   the address of the end user. The systems, however, will not check the

9   data in the address fields, if the CLEC decides to use this process.

10 BellSouth notified the CLECs on October 16, 2001 via Carrier Notification

11 Letter No. SN91082611 (Exhibit OSS-77) of the implementation of this

12 functionality in compliance with the Georgia Public Service Commission's

13 order dated October 2, 2001, that ordered BellSouth to implement

14 migration by Telephone Number by November 3, 2001.

15

16 AT&T has also criticized BellSouth's part in the carrier-to-carrier beta test

17 that AT&T and BellSouth refer to as the "Georgia 1000 Trial." The

18 purpose of the test was to validate both BellSouth's and AT&T's ordering,

19 provisioning, billing requirements, and procedures for loop/port

20 combinations (UNE-P). Phases I-III of the test have been completed

21 successfully. AT&T and BellSouth are negotiating Phase IV, which would

22 test OS/DA. A description of the Georgia 1000 Trial is attached as Exhibit

23 OSS-71.

24

1   Current commercial usage demonstrates that BellSouth is fully capable of

2   handling requests for UNE-P. In July 2001, 4,807 UNE-P LSRs were

3   processed.

4

5   The testimony of Ken Ainsworth describes the ordering processes for

6   other UNE combinations.

7

8 Ordering of ADSL-Compatible Loops, HDSL-Compatible Loops, and Unbundled

9 Copper Loops

10

11 Q.   DESCRIBE THE ORDERING PROCESS FOR XDSL COMPATIBLE

12   LOOPS.

13

14 A.   The processes for ordering unbundled xDSL-compatible loops and the

15   high frequency portion of the loop (line sharing) are analogous to those for

16   ordering other UNE loops. CLECs may order them using the standard

17   LSR through the EDI, TAG, LENS and RoboTAG™ interfaces.

18

19   BellSouth enhanced the EDI, TAG, and LENS ordering interfaces for

20   purposes of beta-testing on July 29, 2000 to enable CLECs to order

21   electronically two-wire ADSL-compatible loops, two- and four-wire HDSL-

22   compatible loops, and two- and four-wire Unbundled Copper Loops

23   ("UCLs") – short and long. As I stated earlier, four of the five CLECs that

24   signed the beta test agreement participated in the test of the loop makeup

25   and the ordering functionalities. The four beta testers used different

1 combinations of the pre-ordering and ordering interfaces. The first CLEC

2 to test used LENS for pre-ordering and EDI for ordering; the second used

3 LENS for pre-ordering and ordering. The third CLEC used TAG for pre-

4 ordering and EDI for ordering, while the fourth used TAG for both pre-

5 ordering and ordering.

6

7 Q. PLEASE DESCRIBE THE BETA TESTING FOR THE LOOP MAKEUP

8   INQUIRY.

9

10 A. The first two CLEC beta testers sent their first loop makeup inquiries on

11   September 7 and 8, 2000. Their first test orders followed shortly

12   thereafter. The third CLEC beta tester sent its first loop makeup inquiries

13   and its first orders in mid-October 2000. Before releasing the loop

14   makeup functionality in the production environment, BellSouth had to

15   correct any defects that were found during the testing. The most

16   significant defects were related to address validation and incomplete

17   responses. After correcting these defects, BellSouth released the loop

18   makeup functionality into production on November 18, 2000. The fourth

19   tester, which did not sign its testing agreement until the end of October,

20   sent its first loop makeup inquiries and orders in December 2000, after

21   BellSouth had released the loop makeup functionality.

22

23 Q. PLEASE DESCRIBE THE BETA TESTING FOR THE LOOPS.

24

1   A.   CLECs sent a variety of test cases and "live" LSRs during the beta test.

2   The first CLEC, for example, sent ten test cases during the first few weeks

3   of testing, and then sent over 40 "live" LSRs in October and November

4   2000. The second CLEC, for example, sent two test cases during its first

5   week of testing, and then began submitting "live" LSRs whenever it

6   obtained them from end users. During the beta testing in 2000, BellSouth

7   identified defects, including defects related to the delivery of notifications

8   and communication between the order management database and EDI,

9   that required correction before BellSouth could release this functionality in

10   the production environment. On January 27, 2001, BellSouth upgraded its

11   systems and corrected the defects. The beta testers continued to submit

12   LSRs, sending approximately 45 LSRs between January 27 and February

13   12, 2001. BellSouth's systems properly handled the LSRs and sent the

14   appropriate notifications. For example, the testers received timely FOCs

15   for the LSRs. For those orders that were allowed to process downstream,

16   the beta testers received confirmation notifications (the beta testers

17   canceled some orders before their due dates). The beta testers submitted

18   approximately 137 LSRs throughout the entire test. On February 12,

19   2001, BellSouth released the electronic ordering of unbundled two-wire

20   ADSL-compatible loops, unbundled two- and four-wire HDSL-compatible

21   loops, and two- and four-wire UCLs (long and short) into production for all

22   CLECs.

23

24   Q.   IS THERE COMMERCIAL USAGE OF ELECTRONIC ORDERING FOR

25   XDSL COMPATIBLE LOOPS?

1

2   A.   Yes. Between April 1, 2001 and July 31, 2001, CLECs submitted 4,674

3   LSRs for these loops region-wide.

4   Q.   CAN CLECS ORDER XDSL COMPATIBLE LOOPS MANUALLY?

5

6   A.   Yes, as described in the testimony of Ken Ainsworth. In the Georgia Test,

7   KPMG found that BellSouth provides adequate core ordering functionality

8   in support of manual xDSL orders. (STP, at 12-2-3, p. IV-B-8, attached to

9   Milton McElroy's testimony as Exhibit MM-4).

10

11   Ordering Line Sharing

12

13   Q.   DESCRIBE THE ORDERING PROCESS FOR LINE SHARING.

14

15   A.   BellSouth provides CLECs with electronic ordering of the high frequency

16   portion of two-wire copper loops for line sharing for central-office based

17   and BellSouth-owned splitters. The capability to electronically order line

18   sharing has been available to the DLECs and CLECs since September,

19   2000.

20

21   If a CLEC wishes to order line sharing that is central office-based and the

22   splitter is owned by the CLEC, or remote terminal line sharing, it must

23   submit a manual LSR to the LCSC. The mechanization of ordering line

24   sharing for central-office based, DLEC-owned splitters is under

25   development.

1

2   Q.   DID BELLSOUTH BETA TEST LINE SHARING?

3

4   A.   Yes. BellSouth offered beta testing of electronic ordering of line sharing to

5   the CLECs participating in the line sharing collaborative. One CLEC

6   signed a testing agreement. The CLEC completed the testing to establish

7   and connect its ordering interface with BellSouth in September 2000.

8   Because, however, the CLEC was already participating in the beta test for

9   electronic loop makeup and electronic ordering of xDSL compatible loops

10   and UCLs, it did not send any LSRs for line sharing until February 2001.

11   The CLEC's first two LSRs were clarified for errors made by the CLEC.

12   The rest of its LSRs, which tested a variety of scenarios, were successful

13   and received notifications as expected. The final LSR was sent on March

14   2, 2001. The CLEC declined service readiness testing (testing in

15   production), and therefore the test ended on March 2, 2001.

16

17   Flow-through

18

19   Q.   HOW DID THE FCC DEFINE "FLOW-THROUGH"?

20

21   A.   In its Second Louisiana Order, the FCC states, "A competing carrier's

22   orders 'flow through' if they are transmitted electronically through the

23   gateway and accepted into BellSouth's back office order systems without

24   manual intervention." See Second Louisiana Order, ¶ 107. Therefore,

25   flow-through occurs when a CLEC or BellSouth representative takes

1   information directly from an end user customer, inputs it directly into an

2   electronic ordering interface without making any changes or manipulating

3   the customer's information, and sends the complete and correct request

4   downstream for mechanized service order generation.

5

6   Q.   HOW DOES BELLSOUTH CALCULATE FLOW-THROUGH?

7

8   A.   BellSouth calculates flow-through by dividing the total of the issued

9   service orders for CLECs by the total mechanized LSRs, adjusting for the

10   LSRs that are designated for manual handling (total manual fallout), the

11   LSRs that are rejected and sent back automatically to the CLECs (auto

12   clarifications), the LSRs that are pending supplements (Z status), and the

13   LSRs with errors due to CLEC mistakes that fall out for manual handling

14   (CLEC-caused fallout errors). Exhibit OSS-48 depicts flow-through and

15   BellSouth's formula for calculating flow-through (the "CLEC Error Excluded

16   Calculation"). The second page of Exhibit OSS-48 also shows two

17   additional formulas for calculating flow-through: the "Base Calculation" and

18   the "Achieved Flow-Through," which has been discussed by CLECs in

19   other state 271 proceedings.

20

21   Attached as Exhibit OSS-72 is a table containing the rates of flow-through

22   that SBC and Verizon had achieved when they filed for 271 relief in New

23   York, Texas, Massachusetts, Kansas, Oklahoma, Missouri, Connecticut,

24   and Pennsylvania. Although the CLECs achieved average "total flow-

25   through" rates of 46 to 49 percent for residence and business resale and

1   51 to 55 percent for UNEs in Massachusetts, the FCC concluded that

2   Verizon's OSS was capable of flowing through competing carriers' orders

3   in substantially the same time and manner as Verizon's own orders (see

4   the Memorandum Opinion and Order, FCC 01-9, ¶ 78). Using the

5   comparable calculation for BellSouth's region, the CLECs' flow-through for

6   May through July 2001 was 64 to 71 percent for residence and business

7   resale, and 47 to 56 percent for UNEs. This shows that CLECs are

8   achieving higher flow-through for resale orders in BellSouth's region than

9   they were achieving at time Verizon filed its application for Massachusetts,

10   and are achieving comparable flow-through for UNEs.

11

12   Q.   PLEASE DISCUSS BELLSOUTH'S FLOW-THROUGH.

13

14   A.   The chart below lists the UNEs and resale services for which there is fully

15   mechanized order generation. When a CLEC sends a complete and

16   correct LSR using EDI, TAG, or LENS, all aspects of order generation -

17   including the return of firm order confirmations and completion notices -

18   are fully mechanized for these services.

19

Resale Services & UNEs that flow through	EDI	TAG	LENS
UNEs			
Unbundled 2-wire analog loop (designed & non-designed)	X	X	X
Unbundled DS0 loop*	X	X	X
Unbundled DS1 loop*	X	X	X
Unbundled 2-wire ISDN digital loop	X	X	
4-wire analog voice grade loop*	X	X	
LNP	X	X	
LNP plus Unbundled 2-wire analog loop (designed & non-designed) combination	X	X	
Unbundled 2-wire analog loop combination plus unbundled 2-wire analog port (designed & non-designed) (a.k.a., UNE-P)	X	X	X

Line Sharing, CO-based, BellSouth-owned splitter+	X	X	X
Unbundled ADSL-compatible loops (excluding INP)	X	X	X
Unbundled HDSL-compatible loop, 2-wire & 4-wire-** (excluding INP)	X	X	X
Unbundled Copper Loop (UCL), 2-wire & 4-wire, short & long**	X	X	X
LNP plus Unbundled 2-wire ADSL-compatible loops**	X	X	
LNP plus Unbundled 2-wire & 4-wire HDSL-compatible loops**	X		
LNP plus 2-wire & 4-wire UCLs, short & long**	X	X	
Resale			
Area Plus	X	X	X
Call Block	X	X	X
Call Forwarding – Variable	X	X	X
Call Return	X	X	X
Call Selector	X	X	X
Call Tracing	X	X	X
Call Waiting	X	X	X
Call Waiting Deluxe	X	X	X
Caller ID	X	X	X
Collect Call Block	X	X	X
Directory Listings (simple)*	X	X	X
Enhanced Caller ID	X	X	X
Flat Rate/Business	X	X	X
Flat Rate/Residence	X	X	X
Hunting Series Completion*	X	X	X
Georgia Community Calling	X	X	X
Measured Rate/Business	X	X	X
Measured Rate/Residential	X	X	X
Memory Call	X	X	X
Memory Call Answer Service	X	X	X
Message Telephone Service	X	X	X
900 Call Block	X	X	X
Optional Calling Plan	X	X	X
Package/Complete Choice & Area Plus	X	X	X
PIC/LPIC Change	X	X	X
PIC/LPIC Freeze	X	X	X
Preferred Call Forward	X	X	X
Remote Access to Call Forwarding	X	X	X
Remote Call Forwarding	X	X	X
Repeat Dialing	X	X	X
Ringmaster	X	X	X
Speed Calling	X	X	X
Third Party Call Block	X	X	X
Three-way calling	X	X	X
Three way Call Block	X	X	X
Touchtone	X	X	X
Visual Director	X	X	X

1   * Flow-through for these services was added with Release 6.0 ("OSS99").
2   ** Flow-through for these services was added with Release 7.0.
3   + Flow-through for these services was added with Release 7.1

2   Exhibit OSS-48, pages 1-2 contains a matrix that shows flow-through by

3   requisition type and activity type. This information is available to CLECs in

4   the *BellSouth Business Rules for Local Ordering* (Exhibit OSS-9)

5

6   After the January 14, 2000 implementation of Release 6.0 of EDI and

7   Releases 3.0 and 3.1 of TAG, some CLECs chose not to upgrade their

8   EDI and TAG ordering interfaces. As a result, the flow-through

9   enhancements that occurred with these new releases and those

10   subsequent will not be realized in these CLECs' flow-through percentages.

11

12 Q.   PLEASE DISCUSS THOSE LSRS THAT "FALL OUT BY DESIGN."

13

14 A.   LSRs for certain complex resale services and UNEs may be transmitted

15   electronically via LENS, EDI, or TAG, but fall out for manual handling by

16   design. In order to enable CLECs to submit some complex LSRs

17   electronically, rather than by fax, BellSouth designed the LENS, EDI, and

18   TAG ordering interface to accept LSRs for these services. After these

19   LSRs are transmitted to BellSouth electronically, they are handled as if

20   they had been faxed to the LCSC. Because these LSRs must fall out for

21   manual handling, BellSouth excludes them from its flow-through

22   calculation. The chart below lists the services and UNEs that may be

23   transmitted electronically, but must fall out for manual handling:

24

Resale Services & UNEs Transmitted electronically, manually handled	EDI	TAG	LENS
UNE			
LNP with Complex Listing	X	X	

LNP with partial migration	X	X	
INP to LNP conversions	X	X	
Loop-port PBX	X	X	
Unbundled 2-wire analog port	X	X	
Resale			
Basic Rate ISDN	X	X	
DID with PBX (switch as is)	X	X	
DID (switch as is)	X	X	
Directory Listing Indentations	X	X	X
Directory Listings Captions	X	X	X
Hunting MLH	X	X	
PBX standalone (add, change, delete)	X	X	
PBX trunks	X	X	
Synchronet	X	X	

1

2   BellSouth has established a Flow-Through Task Force team, which I will

3   discuss in more detail below. The Task Force has been working diligently

4   within the Change Control Process for several months to analyze and

5   improve flow-through. Recently, the Task Force requested that many of

6   the LSR types in the table above be mechanized for flow-through.

7

8   Exhibit OSS-47, page 3 contains list of requisition and activity types that

9   can be submitted electronically, but must fall out for manual handling. For

10   example, LSRs for more than 25 lines will fall out for manual handling,

11   even if the service is listed as flowing through. This also occurs when

12   BellSouth retail submits a service request for more than 25 lines.[12] LSRs

13   with populated project or RPON fields, LSRs for which there are already

14   pending service orders and LSRs for special pricing plans for the specific

15   CLEC will also fall out.[13]   In addition, the following may be transmitted

---

[12] LSRs for 10 or more lines for unbundled ADSL, HDSL, or UCLs will fall out for manual handling. Requests by Network Service Providers ("NSPs"), including BellSouth Internet Services, for 10 or more lines of BellSouth's wholesale ADSL also fall out.

[13] The RPON (related purchase order number) field identifies the PON (purchase order number) of a related LSR. The RPON field may be used for relating connect and disconnect LSRs, multiple LSRs for the same location and due date, or multiple LSRs for directory listings.

electronically, but fall out for manual handling: service requests on

accounts for which there is a contractual payoff involved; expedites based

upon CLEC requests; types of service requests for which there is a low

volume, but a high cost to program for flow-through; and, service requests

that cannot easily be programmed for flow-through for technical reasons,

such as complex services.

Fall-out By Design

AT&T and MCI/WorldCom have also complained before other state

commissions that too many requests fall out by design for manual

handling. While this statement may have been true three years ago –

when, for example, less than 30 percent of resale orders were submitted

electronically -- that is no longer the case today. Now, over 90 percent of

all orders (both UNE and resale) are submitted electronically. While

BellSouth is committed to providing flow through for as many types of

CLEC service requests as is practical, the FCC has recognized that flow

through on all service requests is neither practical nor possible. See New

York Order ¶ 160 n. 488; Texas Order ¶ 180. As I explained above and as

found in Exhibit OSS-74, on page 3-5, BellSouth has defined the types of

service requests that do not flow through by design, as well as the

supporting reasons for such.

Furthermore, the Telecommunications Act does not require that every

process be automated in order to achieve nondiscriminatory access. As I

1   explained in my previous testimony in this docket, and in Exhibit OSS-73

2   (Letter to BellSouth from FCC Carrier Bureau Chief Strickling), all CLP

3   service request types do not have to flow-through without manual

4   handling, and further, all CLP service request types do not have to be able

5   to be submitted electronically. Therefore, BellSouth is in compliance with

6   FCC requirements in this regard. I further explained that BellSouth has

7   the same interests in LSRs flowing through its OSS as do the CLPs.

8   However, total mechanization of all types of requests is not possible due

9   to either technical or practical reasons. Those categories of non-flow-

10   through requests are published in BellSouth's proposed Service Quality

11   Measurements ("SQM") for all states.

12

13   In addition, AT&T also has alleged that most, if not all, LSRs that fall out to

14   manual processing by design have retail analogs that flow through when

15   submitted via BellSouth's front-end retail systems. As explained above

16   and in Exhibit OSS-74, some, but not all, of the CLEC LSR categories that

17   fall out have retail analogs (for example, 25 lines or more). In any event,

18   AT&T's allegations regarding LSRs that fall out by design are

19   exaggerated. Only 8 to 9 percent of all electronic LSRs fall out by design.

20   Measurements exist to readily track BellSouth's performance in this area.

21

22   Q.   DOES BELLSOUTH INCLUDE LSRS FOR COMPLEX SERVICES IN ITS

23   CALCULATION OF FLOW-THROUGH?

24

1   A.   LSRs for complex services are not included in BellSouth's calculation of

2   flow-through. For LSRs for complex services as requested by CLECs, or

3   service orders for complex services requested by BellSouth's end users,

4   there are systems designers and consultants involved in the work flow

5   between the CLEC or BellSouth service representative who takes the

6   request from the end user customer and the person who enters the

7   request into the ordering interface. To prepare the service request for

8   entry, these designers and consultants clarify and expand, if necessary,

9   the information received from the end user customer. Service requests for

10   complex services, therefore, cannot be said to flow through because there

11   is significant manual handling. That manual handling varies from request

12   to request, but is the same for CLEC and BellSouth retail orders, between

13   the time the information is taken by the CLEC or BellSouth service

14   representative and the time the request is input. Manual handling of

15   complex resale services is discussed below.

16

17   In 271 proceedings in other states, AT&T has challenged the exclusion of

18   these requests in the flow through calculation. The FCC, however, has

19   confirmed that BellSouth could exclude complex orders from flow-through

20   calculations, which is one of the main examples of designed manual

21   handling. Above, I described the FCC's position on flow-through

22   calculations by referencing the Second Louisiana Order and Strickling

23   letter (Exhibit OSS-73).

1

2 Mechanized Service Order Generation of LSRs

3

4 Q. DESCRIBE BELLSOUTH'S MECHANIZED SERVICE ORDER

5 GENERATION OF LSRS.

6

7 A. The majority of non-LNP LSRs are generated through LEO and LESOG.

8 The current exception to the process is LSRs for xDSL-compatible loops

9 and UCL, which I discuss later in my testimony.

10

11 Before a mechanized service order is created, the LSR submitted through

12 EDI, TAG, or LENS must pass edits that check for valid data entries and

13 formats as well as conditions between various fields. The Business Rules

14 cover all the necessary requirements for submitting complete and correct

15 LSRs. For more information on the Business Rules, and on the training to

16 assist CLECs with implementing the Business Rules, please see the

17 "Support for CLECs" section of my testimony. BellSouth programs up-front

18 edits for TAG and LENS in the Application Programming Interface ("API").

19 CLECs also can program additional edits in TAG, if they desire. Up-front

20 edits for EDI are programmed by the CLECs on the CLEC side of the

21 interface, based on the business decisions of the CLECs. For TAG users,

22 the API resides on the CLEC's side of the interface in the CLEC's server.

23 BellSouth's provides the API to TAG users so that they can download it to

24 their servers. The EDI interface is based on a much older standard. For

25 EDI, there is no equivalent to the TAG API server, nor does the EDI

1 standard call for one. Thus, the CLEC is responsible for programming up-

2 front edits on its side of the interface, if it chooses to use the EDI interface

3 for ordering. The edits are contained in the *BellSouth Business Rules* and

4 the EDI specification. The up-front edits for TAG, LENS, and EDI are

5 additional to those that BellSouth has programmed in LEO and LESOG.

6 The check for valid date entries and formats for LSRs submitted through

7 EDI are performed by LEO. LSRs for xDSL-compatible loops or UCLs are

8 handled separately through the Telcordia platform that includes

9 ServiceGate™ Gateway ("SGG"), Order Manager, and Service Order

10 Generator ("SOG"). Flow-through for a CLEC LSR "starts" when a

11 complete and correct electronically-submitted LSR is sent via the EDI,

12 TAG, or LENS ordering interface.

13

14 A CLEC LSR submitted via EDI is first sent to the LSR Router. The LSR

15 Router will determine what type of service is being ordered so that it can

16 be routed to the correct system. If the LSR is for LNP, it is sent to the LNP

17 Gateway. If the service is for non-number portability xDSL-compatible

18 loops or UCL, the LSR is sent to the SGG. All other LSRs are routed to

19 LEO.

20

21 All requests for xDSL-compatible loops or UCL that are submitted via

22 LENS or TAG will be routed to SGG. All others will be routed to the LSR

23 Router. LSRs that are routed to the LSR Router will be sent to either the

24 LNP Gateway or to LEO, depending upon the type of service being

25 requested.

1

2   The LNP Gateway is the major link in the LNP process because it

3   supports both internal and external communications with various

4   interfaces and process, including the link between BellSouth and the

5   CLECs for the electronic ordering of LNP. The electronic pre-ordering

6   steps for LNP are the same as those for other UNEs and resale services.

7   A clean and correct LSR for LNP is transmitted from the EDI or TAG

8   ordering interface, then to the EDI or TAG gateways, and then to the LSR

9   Router. The LSR Router sends LSRs for LNP to the LNP Gateway where

10   error checks are performed for accuracy, completeness, and format. If an

11   error is found, a reject notification is returned to the CLEC via EDI or TAG.

12   If no errors are detected, the LSR is sent to LAUTO ("LNP Automation")

13   for further processing. LAUTO interfaces with other BellSouth OSS to

14   further check the LSR for validity. If an error is found, the error is recorded

15   in the LNP Gateway database, and a clarification is returned to the CLEC.

16   If LAUTO detects no errors and the LSR is eligible for mechanization, a

17   service order is mechanically generated and transmitted to SOCS.

18

19   Complete and correct non-LNP LSRs flow mechanically to the LEO

20   system. [14] The LEO system receives the LSR and mechanically performs

21   edit checks to determine if all the required fields have been correctly

22   populated. If the LSR fails the edit checks in LEO, it will be returned to the

23   CLEC via the appropriate interface as a "fatal reject." Fatal rejects are

24   errors that prevent an LSR from being processed further. The CLEC

---

[14] LSRs for xDSL-compatible loops and UCLs flow through the SGG and Order Manager.

1   receives a fatal error notification that contains an error code and an

2   English-language description of the fatal reject.

3

4   Fatal rejects appear in a section of the Monthly Flow Through Report

5   entitled "Percent Flow Through Service Requests [Fatal Rejects]." The

6   total in this column represents the number of LSRs that were fatally

7   rejected by LEO. Fatal rejects are not included in the calculation of flow-

8   through.   If an LSR passes LEO's edit checks, it then will mechanically

9   "flow" to LESOG. LESOG performs further checks for errors and for LSRs

10   that cannot be mechanically handled. If the LSR contains an error or

11   errors, or if it is not a candidate for mechanical handling, it will not flow-

12   through to SOCS.

13

14   If an LSR is "passed" by LESOG, LESOG will mechanically transform the

15   LSR into the service order format that can be handled by SOCS and by

16   the other downstream BellSouth systems through which BellSouth's own

17   service orders, as well as CLEC orders, are also processed. From

18   LESOG, the CLEC service order flows to and is accepted by SOCS

19   without any manual intervention. Once an order is accepted, its path

20   through BellSouth's downstream legacy system is the same for CLEC

21   orders as it is for BellSouth's retail orders.

22

23   When the LSR is accepted by SOCS, SOCS mechanically returns a firm

24   order confirmation ("FOC") to the CLEC via EDI or TAG or LENS,

25   depending on which interface was used to transmit the LSR to BellSouth.

1 The FOC is the CLEC's assurance that its LSR has successfully passed

2 through the various edits and formatting checks and is pending as an

3 order in SOCS.

4

5 Occasionally, SOCS is not available to accept service orders from

6 LESOG. When that happens, LESOG will attempt nine times to send the

7 service order to SOCS. After the ninth unsuccessful attempt, LESOG

8 "drops" the service order to the LCSC for manual handling. A similar

9 situation may occur for service orders from BellSouth's retail operations.

10

11 If an LSR does not "pass" LESOG/Order Manager's checks, the LSR will

12 be sent back automatically to the CLEC for clarification ("auto-clarified") or

13 will fall out of LESOG/Order Manager for manual handling.

14

15 Q. DESCRIBE THE PROCESS FOR THE LSRS THAT HAVE FALLEN OUT

16 FOR MANUAL HANDLING.

17

18 A. A list of the LSRs that have fallen out for manual handling, whether by

19 design or in error, is maintained in LEO/Provisioning Analyst WorkStation

20 ("PAWS"). PAWS contains manual fallout for xDSL-compatible loops and

21 UCL. LSRs that fall out by design are listed in the chart above regarding

22 LSRs that are transmitted electronically, handled manually. In addition,

23 certain other types of LSRs that are transmitted electronically, also fall out

24 for manual handling, as described earlier and on page 3 of Exhibit OSS-

25 47. In order to process the LSRs that require manual handling, a service

1   representative in the LCSC selects the next LSR that contains an error

2   from LEO/PAWS. The service representative then analyzes the LSR to

3   determine whether the LSR fell out by design for manual handling, or

4   whether the LSR contains an error that was caused by the CLEC or by

5   BellSouth's systems. LSRs that fall out by design for manual handling are

6   treated as if they had been faxed to the LCSC. To make the

7   determination about errors, the service representative reviews the LESOG

8   error screen or the error code in PAWS, for additional information about

9   the error. After this analysis, the service representative will next review

10   information from systems such as SOCS or methods and procedures

11   documentation.

12

13   If the service representative determines the error was caused by

14   BellSouth (i.e., LESOG/SOG could not handle part of the LSR), the

15   representative will correct the error, issue the service order, and send a

16   FOC to the CLEC via the same interface that was used to transmit the

17   LSR. If the error was caused by the CLEC, the service representative will

18   enter this information on the Error Screen in LEO or the clarification

19   screen in PAWS, which then will send an electronic clarification

20   notification to the CLEC via the same interface that was used to transmit

21   the LSR. Service representatives in the LCSC are not supposed to

22   correct errors made by CLECs; occasionally, in attempting to speed the

23   process, they do correct CLECs' errors. These CLEC errors are then

24   counted against BellSouth in the flow-through calculations. The CLEC

25   must respond to a clarification notification before any further processing

1   will occur. The Georgia Public Service Commission, however, on October

2   2, 2001, ordered BellSouth to increase the reject correction time limit from

3   10 days to 30 days by November 3, 2001. On October 12, 2001,

4   BellSouth notified the CLECs via Carrier Notification Letter No. 91082645

5   (attached as Exhibit OSS-64) that this change would be fully implemented

6   by October 15, 2001.

7

8 Q. WHAT IS THE PROCESS FLOW FOR CERTAIN XDSL COMPATIBLE

9   LOOPS?

10

11 A. Complete and correct LSRs for unbundled two-wire ADSL loops,

12   unbundled two-wire and four-wire HDSL loops, and two-wire and four-wire

13   UCLs (short and long) will flow mechanically from the CLEC interfaces to

14   the ServiceGate™ Gateway ("SGG").   The SGG sends the LSR to the

15   Order Manager. Order Manager checks the LSRs for formatting and

16   errors, and validates or rejects the LSRs, similar to LEO and LESOG.

17   Order Manager, via ServiceGate™ Service Order Generator ("SOG"), will

18   mechanically transform complete and correct LSRs into the service order

19   format that can be handled by SOCS and by the other downstream

20   BellSouth systems through which BellSouth's own service orders, as well

21   as CLEC orders, are also processed. From Order Manager, the CLEC

22   service order flows to and is accepted by SOCS without any manual

23   intervention. Once an order is accepted, its path through BellSouth's

24   downstream legacy system is the same for CLEC orders as it is for

25   BellSouth's retail orders. Notifications are sent back to the CLEC via

1   SOCS and SGG as they are for LSRs processed via LEO, LESOG, and

2   SOCS.

3

4   Q.   EXPLAIN HOW THE CHANGES IN THE CLEC INDUSTRY AFFECTS

5   BELLSOUTH'S FLOW-THROUGH RATES.

6

7   A.   Every month new CLECs begin to use the electronic interfaces or

8   established CLECs change interfaces. The increase or decrease of errors

9   committed by the CLECs can depend on the experience and quality of the

10   CLEC. Other than providing CLECs with the information and training

11   necessary to submit complete and correct LSRs, which BellSouth has

12   done and continues to do, BellSouth has no control over these factors.

13   Another reason for fluctuations in the allocation of errors has been the

14   changes and enhancements made to the CLEC interfaces and BellSouth's

15   OSS, such as Releases 6.0 and 7.0, which added more UNEs and resale

16   services that flow-through (see items with asterisks in the chart entitled,

17   "Resale Services & UNEs that flow through" found herein under the

18   heading "Flow-Through").

19

20   Flow-through rates for CLEC Business Resale Orders and CLEC UNE Orders

21

22   Q.   PLEASE DISCUSS THE FLOW-THROUGH RATES FOR BUSINESS

23   RESALE ORDERS AND CLEC UNE ORDERS.

24

1   A.   The flow-through of CLECs' business LSRs is considerably lower than the

2   flow-through of CLEC's residential LSRs because most business LSRs

3   are for complex services. Most LSRs for complex services do not flow

4   through, with the exception of hunting series completion. LSRs for

5   complex services are almost always for businesses. LSRs for business

6   services may contain, for example, multiple facilities terminations or

7   different features for different locations of the same business, which add to

8   the complexity of the LSR. Additionally, the volume of electronically-

9   submitted LSRs for business services is only 5 % of the total volume of

10   electronically-submitted LSRs, making the base lower. In addition, the

11   level of experience of the CLEC representatives preparing these LSRs is

12   lower than it is for preparing LSRs for residential services. This is

13   reflected in the higher error rate on LSRs for business customers. The

14   complexity of LSRs for business services makes the flow through of these

15   considerably lower than flow-through for residential LSRs.

16

17   The flow-through of LSRs for UNEs is also lower than the flow-through of

18   residential services, but is improving. The flow-through of LSRs for UNEs

19   is lower because UNEs are still relatively new in the world of

20   telecommunications; no one has nearly the experience ordering UNEs

21   compared to the thousands of resale orders and millions of retail orders

22   which have been ordered and processed. Additionally, the base of

23   electronically-submitted LSRs for UNEs is small compared with LSRs for

24   resale services. In March 2001, for example, LSRs for UNEs comprised

1   approximately 21.7 percent of the total volume of electronically-submitted

2   LSRs.

3

4   In summary, service order generation is a complicated process.

5   BellSouth's extensive experience level with residential retail produces a

6   high flow-through rate. Because business orders for retail and resale are

7   more complex, the business flow-through rate is lower. Likewise, because

8   experience with UNEs is at a much lower level, UNE flow through is lower

9   but increasing with time.

10

11   Q.   PLEASE DISCUSS BELLSOUTH'S EFFORTS TO IMPROVE FLOW-

12   THROUGH.

13

14   A.   BellSouth has introduced a number of change requests to the CCP to

15   improve flow-through, and on January 12, 2001, the Georgia Commission

16   ordered BellSouth to establish a collaborative process with the CLECs to

17   improve flow-through. BellSouth and the CLECs formed a cooperative

18   "flow-through improvement task force," which is operating as a

19   subcommittee of the CCP. The objective of the task force is to enhance

20   the flow-through of electronic orders, document those enhancements, and

21   develop a schedule for implementing the enhancements.

22

23   BellSouth announced the formation of the task force to the CLEC

24   community on February 15, 2001, via the CCP. The CLECs and

25   BellSouth established the task force at the regularly scheduled CCP

monthly status meeting on February 28, 2001. Thus far, the task force

has met in March, April, June, and July 2001. The next task force meeting

is scheduled for October 17, 2001.

To date, the task force has identified and prioritized twenty-one flow-

through improvement items. The following existing BellSouth proposed

flow-through improvement features were presented and prioritized during

the April task force meeting. The items are targeted for implementation

with Release 10.3 on January 5, 2002.

Item Description	Targeted Release Date
Do not display error message on supplements – Q status LSR	Release 10.3 - 1/5/2002
Change requirements to not require RTX on LSR	Release 10.3 - 1/5/2002
Ability to process coin orders electronically (LENS)	Release 10.3 - 1/5/2002
Removal of ADSL on conversion orders	Release 10.3 - 1/5/2002
Correct Format of CCON on UNE-P Orders	Release 10.3 - 1/5/2002
Ringing Cycle not provided for ringmaster	Release 10.3 - 1/5/2002

Two additional lists of items were developed and prioritized by the task

force participants during the July meeting. One list identifies flow-through

improvement items for which the task force recommends conversion from

manual to electronic processes. The second list recommends items for

conversion from planned manual fallout to complete mechanization. The

following items contained in these lists are being reviewed for acceptance

as Type 2 change requests, and will adhere to the process flow described

in the CCP document (Exhibit OSS-39).

Priority	Item Description	Recommend Process
1	Line Splitting	Convert from manual to electronic

2	EELS/Non-Switch Combos	Convert from manual to electronic
3	4-Wire Digital Loops	Convert from manual to electronic
4	UDC Loops	Convert from manual to electronic

1

Priority	Item Description	Recommend Process
1	RPON'd LSRs	Convert from planned manual fallout to complete mechanization
2	Partial Migrations	Convert from planned manual fallout to complete mechanization
3	Multi-Line Hunting	Convert from planned manual fallout to complete mechanization
4	UNE-P With Special Pricing Plans (Strip VCA and RJ11)	Convert from planned manual fallout to complete mechanization
5	Denials/Restorals Req Conversions and Disconnects)	Convert from planned manual fallout to complete mechanization
6	Complex DID DID w/PBX ACT=W DID ACT=W DID/PBX w/Terminals	Convert from planned manual fallout to complete mechanization
7	Directory Listings Indentions/Captions	Convert from planned manual fallout to complete mechanization
8	LNP w/Complex Services	Convert from planned manual fallout to complete mechanization
9	LNP w/Complex Listings	Convert from planned manual fallout to complete mechanization
10	XDSL via LENS	Convert from planned manual fallout to complete mechanization

2

3 It is important to note that BellSouth has been attempting to identify areas

4 of flow-through improvement since well before the formation of the Task

5 Force, and continues to work on those pre-Task Force issues in

6 conjunction with those newly identified by the Task Force. Following is a

7 representative list of key items installed or planned, along with release

8 numbers and implementation dates. Some of the items in this list were

9 implemented as a result of the Louisiana Collaborative Workshop.

10

Flow-Through Improvement Item	Release Date	Notes
Do Not Tear Down ("DNTD") MemoryCall Mailbox	Release 9.2 April 7, 2001	LSRs with non-resellable USOCs no longer require manual handling because the DNTD FID (field identifier) for MemoryCall Service is populated.
CKL2 not populated when	Release 9.2	This was identified as a defect. The second circuit

LOC provided on SL1/SL2 ReqType AB	April 7, 2001	location ("CKL2") is now populated properly when the location ("LOC") information is provided for that second location, and these requests will not drop for manual handling any longer.
Allow the ability to resubmit LSR on non-affected PSO	Release 9.4 July 28, 2001	On an account that has a pending service order, systems will allow submission of an LSR that does not affect the pending service order ("PSO"), BellSouth's systems will allow submission and flow-through of an LSR provided that the activity requested on that LSR does not affect the PSO. Currently, all LSRs issued on accounts w/PSOs require manual handling.
Enhancements to Fast Track (central office-based) Line Sharing	Release 9.4 July 28, 2001	Among a host of enhancements to the Line-Sharing functionality, this modification will allow automatic validation of certain account and line activity types (ACT and "LNA") on initial Line Share orders that currently fall out for manual handling when submitted electronically. Also, the LSR that is required to establish Line-Sharing on a line that currently has ADSL on it will flow-through without falling out for manual handling, and supplemental LSRs will flow-through without falling out for manual handling.
New install with no prior service at LOC, and service address is valid in RSAG	Release 10.3 Jan 5, 2002	This enhancement for LEO/TAG/LENS will allow electronic ordering and flow-through of an LSR when service is being installed at a new address that has had no prior service – provided the address is valid in the Regional Street Address Guide ("RSAG"). Currently, all such requests fall out for manual handling.
Modify CHC and DFDT for designed loops	Release 10.3 Jan 5, 2002	For LEO/TAG, this modification to the entries in Coordinated Hot Cut ("CHC") and Desired Frame Due Time ("DFDT") fields will facilitate flow-through when populated correctly. However, requests will reject if certain conditions regarding those fields are not met.
Add NEWLOC to EDI	Release 10.3 on Jan 5, 2001	This EDI enhancement is similar to an improvement listed above for LEO/TAG/LENS to allow electronic ordering and flow-through when service is being installed at a new RSAG-valid address that has had no prior service
Modify CHC and DFDT for designed loops	Release 9.4 July 28, 2001	This LENS modification to entries on CHC and DFDT fields is similar to a previously listed improvement for LEO/TAG.
Est. DD (at Inquiry Menu) will not calculate more than two business lines	Release 9.4 July 28, 2001	This enhancement will provide correct due date calculation at the inquiry menu for more than two business lines, and allow LSRs to be sent and processed without falling out for manual handling.
LUD on migrations	Release 10.0 Sept. 29, 2001	This enhancement will allow the systems to recap and add the local usage detail ("LUD") option automatically when an LSR is issued to migrate an end user with LUD to a CLEC. Currently, such an LSR falls out for man hdlg.

1

2   At no time has BellSouth had more resources committed to improving

3   flow-through. It is, however, important to note that some CLECs currently

4   have achieved high flow-through rates, even without these efforts. As

1   evidenced by the wide variation in flow-through rates for individual CLECs,

2   the care with which a CLEC prepares an order affects whether that order

3   will actually flow through. For example, during the month of May 2001,

4   base calculation flow-through rates for residential orders from CLECs with

5   at least 100 orders ranged from just under 20 percent to over 98 percent.

6   Out of the 141 CLECs that had more than 100 orders that month, 31 met

7   the Georgia PSC's and Louisiana PSC's flow-through benchmark of 95

8   percent. With respect to UNE orders, again considering CLECs with more

9   than 100 orders in May 2001, base calculation flow-through rates ranged

10 from 0 percent to over 96 percent, with 7 out of 62 CLECs meeting the

11 applicable benchmark of 85 percent. Finally, with respect to business

12 orders, base calculation flow-through rates ranged from a low of almost 28

13 percent to a high of 80 percent.

14

15 Manual Handling for Resale Services/UNEs

16

17 Q.   DO SOME CLECS CHOOSE TO USE MANUAL METHODS FOR

18   INTERACTING WITH BELLSOUTH?

19

20 A.   Yes. Even though there are electronic interfaces, some CLECs choose to

21   use manual methods to perform pre-ordering, ordering, provisioning,

22   maintenance and repair, and billing for resale services and UNEs. Please

23   see the testimony of Ken Ainsworth for a complete description of the

24   manual interfaces available to the CLECs that choose to use them.

1

Pre-ordering ("Service Inquiry") and Ordering for Complex Services

2

3

4　Q.　ARE MANUAL INTERFACES REQUIRED FOR CERTAIN COMPLEX

5　　　ORDERS?

6

7　A.　Yes. There are some complex services for which manual interfaces must

8　　　be used for pre-ordering and ordering for both CLECs and BellSouth. The

9　　　testimony of Ken Ainsworth explains in detail how requests for complex

10　　　services are handled for CLECs.

11

12　Q.　PLEASE EXPLAIN THE RATIONALE FOR MANUAL HANDLING OF

13　　　CERTAIN COMPLEX ORDERS.

14

15　A.　The specialized and complicated nature of complex services, together with

16　　　the relatively low volume of orders for them relative to basic exchange

17　　　services, renders them less suitable for mechanization, whether for retail

18　　　or resale applications. Complex, variable processes are difficult to

19　　　mechanize, and BellSouth has concluded that mechanizing many low-

20　　　volume complex retail services for its own retail operations would be an

21　　　imprudent business decision, in that the benefits of mechanization would

22　　　not justify the cost. Because the same manual processes are in place for

23　　　both CLEC and BellSouth retail orders, the processes are

24　　　nondiscriminatory and competitively neutral.

25

1 Q. WHAT ARE THE SERVICES THAT MUST BE ORDERED MANUALLY?

2

3 A. Below is a chart listing the services that must be ordered manually:

4

Resale Services & UNEs that must be ordered manually
UNEs
2 wire analog DID trunk port
2 wire ISDN digital line side port
4 wire DS0 & PRI digital loop
4 wire DS1 & PRI digital loop
4 wire ISDN DS1 digital trunk ports
Digital Data Transport
DS3
Resale Services
Accupulse
CENTREX
ESSX
FLEXSERV
Frame Relay
FX (Foreign Exchange)
LightGate
Megalink
Megalink-T1
Multiserv
Native Mode LAN Interconnection (NMLI)
Off-Prem Stations
Pathlink Primary Rate ISDN
Payphone Provider
Smartpath
SmartRING
Tie Lines
WATS

5

6 Recently, BellSouth added electronic ordering of primary rate ISDN and

7 frame relay to ROS, BellSouth's business retail system. These services

8 make up a very small part of the CLECs' ordering volume. In July 2001,

9 CLECs submitted 25 LSRs for primary rate ISDN and 413 LSRs for frame

10 relay out of a total of 413,958 LSRs submitted for that month. BellSouth

11 has submitted change requests CR0505 and CR0506 to the CCP.

12

1　Q.　CAN YOU GIVE THE AUTHORITY AN EXAMPLE OF A COMPLEX

2　　　SERVICE FOR WHICH RETAIL HANDLING IS NOT FULLY

3　　　MECHANIZED?

4

5　A.　Yes. An example of a complex service for which retail handling is not fully

6　　　mechanized is Centrex® service, a complex service available to both retail

7　　　customers and to resellers. In both cases, the pre-ordering and ordering

8　　　processes are largely manual. Nonetheless, these manual pre-ordering

9　　　and ordering processes are substantially the same for both retail and

10　　　CLEC orders. Service orders for retail services are handled primarily by

11　　　the appropriate business unit for retail services -- BellSouth Large

12　　　Business account teams. Orders for CLEC services are handled by the

13　　　appropriate business unit for CLEC services – CLEC account teams that

14　　　are part of Interconnection Services (ICS). The handling of complex

15　　　services for CLECs by the Interconnection Services Account Teams is

16　　　substantially the same as the handling of complex services by BellSouth's

17　　　Large Business account team for BellSouth's retail customers.

18

19　　　Attached to this testimony is Exhibit OSS-49, which depicts the flow of the

20　　　process for ordering Centrex® by CLECs, and Exhibit OSS-50, which

21　　　depicts the flow of the process for ordering Centrex® by BellSouth's retail

22　　　unit. These flow charts are included as examples to show the similarities

23　　　in the processes used for CLECs and retail customers.

24

1   Detailed descriptions of the manual service inquiry and ordering

2   processes for resale services and UNEs are found in the testimony of Ken

3   Ainsworth. During the service inquiry and ordering processes an

4   extensive package of paper forms is assembled. In both the retail and the

5   resale cases, this package is manually handed off to the service center,

6   where paper service order worksheets are created to assist in entering

7   service orders in the ordering system. After the handoff, the service

8   orders are typed into the appropriate service order system for the type

9   customer, either ROS, for BellSouth retail customers, or DOE or SONGS,

10   depending on the location, for CLEC customers. The service

11   representative in the LCSC inputs manually-submitted LSRs for Designed

12   services into the Exchange Access Control and Tracking system

13   ("EXACT") If the LSR comes in electronically and LESOG cannot issue

14   the order, then it falls out for manual handling and the service

15   representative issues the LSR through EXACT. The entry of the order is

16   accomplished in substantially the same manner for both the retail and the

17   resale/UNE situations, whether the customer belongs to a CLEC or

18   BellSouth. Thus, it is the same customer "experience" in either case. After

19   the service order is entered, the account team and project manager are

20   notified by e-mail of the service order numbers and due dates. They

21   follow up with the service centers and the end user customer or CLEC as

22   necessary. These processes, with their substantial reliance on manual

23   handling and paper forms, are common to both retail and CLEC complex

24   orders. Thus, BellSouth provides to CLECs the ability to order complex

1   services in substantially the same time and manner as it provides this

2   ability to its retail customers and retail service representatives.

3

4 Ordering of Interconnection

5

6 Q.   PLEASE DESCRIBE THE ORDERING PROCESS FOR

7   INTERCONNECTION.

8

9 A.   Facilities-based CLECs obtain local interconnection trunking by using an

10   Access Service Request ("ASR"), rather than an LSR. In addition to using

11   the manual methods described in the testimony of Ken Ainsworth,

12   facilities-based CLECs may use the Common Access Front End (CAFE)

13   system, a Web-based GUI to order trunks. CAFE sends ASRs to EXACT,

14   the mainframe ordering system for ASRs. EXACT has been used to

15   process ASRs for more than 15 years. Attached as Exhibit OSS-51 is a

16   presentation on CAFE.

17

18   BellSouth offers CLECs training classes for access services (Access

19   Service Request – Order Local Interconnection Trunking; Access Service

20   Ordering Guidelines; and Special Access for ASR) and a class on CAFE.

21

22 Performance Measurements for Ordering

23

24 Q.   HAS BELLSOUTH IMPLEMENTED PERFORMANCE MEASUREMENTS

25   FOR ORDERING?

1

2   A.   Yes. As will be further described in the performance measurement

3   testimony of Alphonso Varner, BellSouth provides performance

4   measurements for ordering.

5

6   PROVISIONING

7

8   Q.   WHAT HAS THE FCC HELD WITH RESPECT TO PROVISIONING

9   INTERFACES?

10

11 A.   According to §51.5 of the FCC's rules, "'[p]rovisioning' involves the

12   exchange of information between telecommunications carriers where one

13   executes a request for a set of products and services or unbundled

14   network elements or combination thereof from the other with attendant

15   acknowledgments and status reports." The type of information to which

16   these rules refer generally is described in terms of order status reports

17   and completion notifications, such as those indicating missed

18   appointments. BellSouth provides CLECs with access to provisioning

19   information in substantially the same time and manner as BellSouth

20   provides the maintenance and repair function for its retail customers.

21

22 Electronic Jeopardy Notification

23

24 Q.   DOES BELLSOUTH PROVIDE CLECS WITH ELECTRONIC JEOPARDY

25   NOTIFICATION?

1

2 A. Yes. Once an order for a CLEC or a BellSouth customer is pending in

3   SOCS, certain situations can arise that result in a "jeopardy" condition. A

4   jeopardy occurs when the established due date for the order may not or

5   will not be met. There are two types of jeopardies. The first type,

6   "customer-caused" or "end-user-caused," can occur when the end-user

7   customer misses a scheduled installation appointment. The second type,

8   "company-caused" or "service," can occur for a variety of reasons,

9   including the lack of available facilities ("pending facilities" or "PFs"),

10   defective facilities, weather, or unforeseen circumstances affecting

11   technicians' workloads in an area. Service jeopardies do not occur when

12   customers switch their existing telephone service from BellSouth to a

13   CLEC "as is" because this type of order does not involve new facilities or a

14   premise visit by an installation technician. In the Georgia Test, KPMG

15   found that BellSouth satisfied all test criteria for EDI and TAG electronic

16   jeopardy notifications. (MTP, at O&P 2-4-5, p. V-B-24; O&P 2-3-5, p. V-B-

17   17; O&P 1-3-5, p. V-A-17; O&P 1-4-5, p. V-A-25, attached to Milton

18   McElroy's testimony as Exhibit MM-3).

19

20   BellSouth transmits electronic notifications for both types of jeopardies to

21   CLECs through the EDI, TAG, and LENS interfaces. Both types of

22   jeopardy notification have been available through TAG and LENS since

23   their inception. Electronic notification of "customer-caused" jeopardies

24   has been available through EDI since its inception. Since December 19,

1   1998, CLECs have received pending order status change notifications via

2   EDI that indicate a PF condition.

3

4   Electronic Notification of Order Completions

5

6   Q.   DOES BELLSOUTH PROVIDE CLECS WITH ELECTRONIC

7   NOTIFICATION OF ORDER COMPLETIONS?

8

9   A.   Yes. For LSRs submitted electronically, CLECs receive completion

10   notifications ("CNs") after a service order has been posted as complete in

11   SOCS. A completion notification includes the date on which the order was

12   completed. When SOCS is notified by downstream systems that an order

13   has been completed, SOCS returns the completion notification to LEO.

14   LEO then sends the completion notification electronically to the CLEC

15   through EDI, TAG, or LENS, depending on which interface was used to

16   submit the order. Except in the case of xDSL-compatible loops, which are

17   sent back via SGG. In the case of LNP, the completion notification is

18   returned via the LNP Gateway.

19

20   BellSouth does not transmit completion notifications through RNS and

21   ROS to its service representatives. Measurements regarding completion

22   notifications will be discussed in the performance measurements

23   testimony of Alphonso Varner.

24

1   In the Georgia Test, for those test criteria for electronic notification of order

2   completions for which KPMG has results, KPMG found the criteria

3   satisfied for EDI and TAG. (MTP, at O&P 1-4-4, p. V-A-24; O&P 2-4-4, p.

4   V-B-23, attached to Milton McElroy's testimony as Exhibit MM-3).

5

6 Q.   DOES BELLSOUTH PROVIDE COMPLETION NOTIFICATIONS ("CN")

7   TO CLECS FOR BOTH ELECTRONICALLY AND MANUALLY

8   SUBMITTED LOCAL SERVICE REQUESTS?

9

10   A. BellSouth provides an electronic CN to CLECs who submit Local Service

11   Requests ("LSRs") electronically. An electronic CN is delivered to the

12   CLEC once BellSouth's systems determine that the service order is

13   completed, is error free, and is in the Completion/Error free ("CPX") or

14   Posted Complete/Error free ("PCX") status. Completion Notifications are

15   not provided to CLECs on manually submitted LSRs, however, CLECs

16   may determine the completion status of its LSRs (e.g. Completed Order

17   ("CP"), Pending Facilities ("PF"), Missed Appointment ("MA"), etc.) by

18   accessing the BellSouth CLEC Service Order Tracking System ("CSOTS")

19   Website, which will be discussed in the next section.

20

21 The CLEC Service Order Tracking System

22

23 Q.   DESCRIBE THE CLEC SERVICE ORDER TRACKING SYSTEM.

24

1   A.   On November 8, 1999, BellSouth introduced a Web-based electronic

2   interface for CLECs that enables them to view their service orders online,

3   track their service orders, and determine the status of their electronically-

4   and manually-submitted service orders in SOCS. This interface is called

5   the CLEC Service Order Tracking System or "CSOTS." CLECs can use

6   CSOTS to view their orders as they appear in SOCS, and to obtain other

7   useful provisioning and status information, such as jeopardy statuses, like

8   pending facilities ("PFs") and missed appointments ("MAs"). As discussed

9   above, information about order status is available through LENS, TAG,

10   and EDI for the orders submitted through these interfaces. CLECs may

11   obtain access to the CSOTS by contacting their BellSouth Account Team.

12   Attached as Exhibit OSS-28 is the *CSOTS User's Guide.*

13

14   CSOTS provides CLECs with a "view" that shows service orders by order

15   status and by state. CSOTS allows CLECs to search for information using

16   a variety of criteria, including a range of due dates; the current due date;

17   the telephone account number; the service order number; and the

18   purchase order number ("PON"). CLECs can sort this information by

19   PON, by NPA NXX, by status type, by the number of days orders have

20   been in a particular status, by listed name, by service order number, and

21   by current due date.

22

23   CSOTS offers CLECs the option of viewing and/or downloading

24   provisioning information using Microsoft's Excel™ spreadsheet program.

25

1   In the Georgia Test, KPMG tested the accuracy of response and clarity of

2   information for CSOTS for orders placed through both EDI and TAG and

3   found these test criteria satisfactory. (MTP, at O&P 1-4-7; p. V-A-26 – 27;

4   O&P 2-4-7, p. V-B-26; attached to Milton McElroy's testimony as Exhibit

5   MM-3).

6

7   Q. DID BELLSOUTH TEST CSOTS?

8

9   A. Yes. BellSouth performed internal user acceptance testing (UAT) of

10   CSOTS on October 21, 1999. This test demonstrated that CSOTS was

11   functionally ready for CLEC testing. In addition, five CLECs participated in

12   a carrier-to-carrier Beta test of CSOTS during October 25-29, 1999. The

13   Beta test demonstrated that CSOTS was ready for use in full production.

14

15 Q. HOW DO CLECS ACCESS CSOTS?

16

17 A. To access CSOTS, CLECs only need internet access, a Web browser,

18   and a password. The Account Teams for the CLECs provide them with

19   the Web address for CSOTS, a user identification and password, start-up

20   instructions, and trouble reporting procedures. Because the interface is

21   password-protected, it permits each CLEC to access only information

22   about its orders.

23

24 Other Order Status Information

25

1   Q.   WHAT OTHER ORDER STATUS INFORMATION DOES BELLSOUTH

2   PROVIDE CLECS?

3

4   A.   BellSouth provides CLECs with a Purchase Order Number ("PON") Status

5   Report for all manually- and electronically submitted LSRs. These reports

6   provide order status information, as well as information about clarifications

7   and rejections, status of FOCs, and due dates. This report is described in

8   more detail in the testimony of Ken Ainsworth. This report is posted on the

9   Web at https://CLEC.bellsouth.com.

10

11   Also described in detail in the testimony of Ken Ainsworth is the "PF

12   Report" ("PF" stands for "pending facilities"). This report shows

13   information about any manual orders in PF status. The report is posted

14   daily on the Web at https://CLEC.bellsouth.com.

15

16 Notification of Competitive Disconnects

17

18   Q.   HOW DOES BELLSOUTH PROVIDE CLECS WITH NOTIFICATION OF

19   COMPETITIVE DISCONNECTS?

20

21   A.   Notifications of competitive disconnects (i.e., loss of a CLEC customer to

22   another local service provider) are furnished via a password-protected,

23   electronic, internet-based Loss Notification Web Report for CLECs. The

24   Loss Notification report provides CLECs with a list of the accounts that

25   were lost on the previous day. The losses may be due to an abandon

1		station condition, an end-user reporting that he has been switched in error,
2		or an end-user choosing to migrate his service to another local service
3		provider. This report is posted at the same site as the PON and PF
4		Reports, and is updated daily at https://CLEC.bellsouth.com.
5		
6		Performance Measurements for Provisioning
7		
8	Q.	HAS BELLSOUTH IMPLEMENTED PERFORMANCE MEASUREMENTS
9		WITH RESPECT TO PROVISIONING?
10		
11	A.	Yes. As further described in the performance measurements testimony of
12		Alphonso Varner, BellSouth has performance measurements dealing with
13		provisioning.
14		
15		MAINTENANCE & REPAIR
16		
17	Q.	WHAT HAS THE FCC HELD WITH RESPECT TO MAINTAINANCE AND
18		REPAIR?
19		
20	A.	The FCC Rules (at §51.5) define maintenance and repair as involving "the
21		exchange of information between telecommunications carriers where one
22		initiates a request for maintenance or repair of existing products and
23		services or unbundled network elements or combination thereof from the
24		other with attendant acknowledgments and status reports."
25		

1 Q.   DOES BELLSOUTH OFFER CLECS ELECTRONIC INTERFACES FOR

2   TROUBLE REPORTING?

3

4 A.   Yes. As explained below, BellSouth offers CLECs electronic interfaces for

5   trouble reporting, which provide CLECs with access to the maintenance

6   and repair function in substantially the same time and manner as

7   BellSouth offers access for its retail customers.

8

9   The following chart demonstrates that CLECs have the same access to

10   BellSouth's maintenance and repair OSS that BellSouth has.

11

BellSouth's Interfaces	Repair & Maintenance Functions	Interfaces offered to CLECs
Residential TAFI Business TAFI	Full repair & maintenance functionality for telephone number-based (non-designed circuit) services	CLEC TAFI
Not Applicable	Industry standard functionality for telephone number-based (non-designed circuit) services (T1/M1 local)	ECTA Local
WFA-C	Repair & maintenance functionality for designed circuit services (access to WFA system)	ECTA Local

12

13 Q.   DOES THE ACCESS THAT BELLSOUTH PROVIDES TO

14   MAINTAINANCE AND REPAIR OSS MEET THE FCC'S

15   REQUIREMENTS?

16

17 A.   Yes. The FCC found that, although it did not offer a machine-to-machine

18   maintenance and repair interface when it filed for long distance relief in

New York, "Bell Atlantic satisfie[d] its checklist obligation by demonstrating that it offers competitors substantially the same means of accessing maintenance and repair functions as Bell Atlantic's retail operations." Bell Atlantic New York Order, ¶ 215. Bell Atlantic accomplished this by providing CLECs with a Web-based GUI. BellSouth accomplishes this by providing CLECs with TAFI. As shown above and described below, by also offering the Electronic Communications Trouble Administration ("ECTA") interface, BellSouth gives CLECs electronic access to its maintenance and repair OSS in a manner that far exceeds what is provided by the Web-based graphical user interface ("GUI") that Bell Atlantic had in place when it was approved by the FCC in December 1999. The FCC, in footnote 565 of its Texas Order, confirmed that interfaces like ECTA are not required when the BOC provides equivalent access in another manner (such as TAFI): "a BOC is not required, for the purpose of satisfying checklist Item 2, to implement an application-to-application interface for maintenance and repair functions – provided it demonstrates that it provides equivalent access to its maintenance and repair functions in another manner."

The TAFI and ECTA interfaces fall under the Change Control Process ("CCP"). On April 18, 2000, AT&T submitted the first request through the CCP for changes to the ECTA interface. BellSouth denied this change request, but offered to provide the changes in response to a Bona Fide Request from AT&T, if AT&T was willing to pay BellSouth for such changes. The Florida Public Service Commission in Docket No. 000731-

160

1   TP concurred with BellSouth's response to AT&T's change request.   Thus

2   far, no such Bona Fide Request has been submitted.

3

4   Exhibit OSS-52 demonstrates BellSouth's and the CLECs' access to the

5   maintenance and repair OSS.

6

7 Trouble Analysis Facilitation Interface ("TAFI")

8

9 Q.   PLEASE DESCRIBE TAFI.

10

11 A.   BellSouth offers CLECs access to the Trouble Analysis Facilitation

12   Interface ("TAFI"), the same maintenance and repair system that

13   BellSouth's own retail representatives use to handle a trouble report for

14   any basic exchange service (i.e., telephone number-based or non-

15   designed services).

16

17   TAFI is a human-to-machine interface with intelligence to do diagnostics

18   and provides rapid, consistent, and efficient automated trouble receipt,

19   screening, and problem resolution. TAFI is an interactive system that

20   prompts the BellSouth or CLEC repair attendant with questions and

21   instructions while automatically interacting with other internal systems as

22   appropriate. TAFI also provides for the queuing of reports to enable

23   BellSouth or CLEC repair attendants to work on several customer troubles

24   simultaneously. TAFI provides on-line reference tools. BellSouth and

25   CLECs can use TAFI in the same manner to enter trouble reports, check

1   the status of a report, and modify existing reports. TAFI gives BellSouth

2   and CLECs direct access to their end user customers' maintenance

3   histories. BellSouth and CLECs can use TAFI to check the status of

4   repair tickets. In addition, by providing access to TAFI, BellSouth has

5   made available to CLECs the functionality inherent in the many OSS with

6   which TAFI interacts, such as the Loop Maintenance Operations System

7   ("LMOS"), on the same basis as BellSouth retail personnel obtain such

8   access. The CLEC TAFI End-User Training Manual and the CLEC TAFI

9   User Guide that I described in the Support for CLECs section of my

10   testimony are attached as Exhibits OSS-34 and OSS-35.

11

12   TAFI is not an industry standard interface. The industry standard for

13   repair and maintenance interfaces addresses only basic functions, such

14   as electronically opening a trouble ticket or obtaining status information.

15   The functionality of BellSouth and CLEC TAFI is superior to the limited

16   functionality supported by the industry standard for trouble reporting.

17   However, as previously stated, TAFI can only process trouble reports for

18   basic exchange services. The industry standard does not include any of

19   the interactive functionality that is contained in TAFI. BellSouth, however,

20   does offer an industry standard based interface, ECTA, to CLECs. ECTA

21   will be discussed below.

22

23   In the Georgia Test, KPMG found that BellSouth satisfied all of the test

24   criteria for functional testing and capacity management evaluation of TAFI.

1   (MTP, at VII-A-9 - VII-A-20; VII-E-7 – VII-E-16; STP, at VI-B-8 – VI-B-19,

2   attached to Milton McElroy's testimony as Exhibit MM-3).

3

4 Q. DOES CLEC TAFI INTERFACE PROVIDE CLECS WITH THE SAME

5   FUNCTIONALITY AS THE BELLSOUTH RETAIL RESIDENCE AND

6   BUSINESS VERSIONS OF THE TAFI INTERFACE?

7

8 A. Yes.   Since the CLEC TAFI interface was introduced to CLECs in March

9   1997, CLEC TAFI has had exactly the same functionality as the TAFI

10   residential interface or the TAFI business interface used by the BellSouth

11   retail units. All upgrades to the BellSouth TAFI interfaces and CLEC TAFI

12   interface have occurred in parallel. There are two slight differences in

13   access. First, because the CLEC TAFI system is used by repair

14   attendants from many different CLECs, CLEC TAFI contains a security

15   screening step that grants CLECs access only to the CLEC's end-user's

16   accounts, to ensure the confidentiality of each CLEC's information. TAFI

17   identifies each CLEC's repair attendants by company and allows each

18   CLEC's repair attendants to access the records belonging only to that

19   CLEC's customers. This process typically takes about 2-3 seconds.

20   Once that validation check has been performed, the CLEC repair

21   attendant has identical access for its end-user's accounts to the full range

22   of TAFI functionality that is available to BellSouth repair attendants for

23   both business and residence exchange services. Second, because the

24   CLEC TAFI system combines the functionality of the separate business

25   and residence versions of TAFI used by BellSouth's repair attendants,

1   CLECs have the advantage of a single system for all types of basic

2   exchange service trouble reports.

3

4 Q.   IS TAFI A MACHINE-TO-MACHINE OR INTEGRATEABLE INTERFACE

5   FOR BELLSOUTH?

6

7 A.   No. Contrary to what CLECs have implied, BellSouth provides CLECs

8   with the same access to TAFI that it provides to itself. TAFI is not a

9   machine-to-machine or integrateable interface for BellSouth (Second

10   Louisiana Order, paragraph 151). When BellSouth's maintenance and

11   repair representatives take trouble reports from end user customers or

12   check the status of a report, they log directly into TAFI. Since these are

13   maintenance and repair functions, there would be no reason to go through

14   BellSouth's marketing and sales support systems, and, therefore, TAFI is

15   not integrated with BellSouth's marketing and sales support systems.

16   When CLECs' representatives take trouble reports from end user

17   customers or check the status of a report, they log directly into TAFI. All

18   information about the trouble reports of CLECs' and BellSouth's end users

19   is maintained in TAFI and in the repair and maintenance OSS to which

20   TAFI interacts. BellSouth therefore provides TAFI to CLECs just as it

21   does for itself. If CLECs wish to enter trouble reports via the same

22   systems they use to place orders, they can integrate ECTA (discussed

23   below) with their marketing and sales support systems just as they can

24   integrate the TAG pre-ordering interface with the TAG ordering interface

25   or the EDI ordering interface. TAFI, however, is not integrated with

1   BellSouth's or CLECs' ordering systems. Moreover, because the TAFI

2   used by BellSouth and CLECs are the same, it is not the case that

3   BellSouth's TAFI can process more service order types than the CLECs'

4   TAFI.

5

6   BellSouth or CLEC TAFI often enables trouble reports to be cleared

7   remotely by the repair attendant handling the initial customer contact,

8   frequently with the customer still on the line. This is possible because

9   TAFI correctly screens 80% of the reports for non-designed services while

10   the customer is on the line. TAFI will execute the appropriate test for that

11   telephone number or retrieve the relevant data to help analyze the

12   problem. For example, if a customer were to report that the customer's

13   call forwarding feature was not working, the TAFI system would check the

14   customer's records to see if the line should be equipped with the call

15   forwarding feature and would electronically verify whether the feature has

16   been programmed in the switch serving that customer's line. Once the

17   TAFI analysis of the trouble is complete, TAFI recommends what is

18   needed to correct the problem and in some cases implements the

19   corrective action. In the above example, TAFI might instruct the repair

20   attendant to have the customer contact the business office to add the call

21   forwarding feature or might correct the trouble by implementing a

22   translation change in the switch to add the feature to the line.

23

24   If TAFI determines that a trouble report must be dispatched to a

25   downstream center or field work group, TAFI passes the trouble ticket to

1 Loop Maintenance Operation Systems ("LMOS"). LMOS is used for

2 maintaining customer line records, and for entering, processing, and

3 tracking trouble reports. TAFI is a front-end system to LMOS. LMOS

4 dispatches the trouble report to the appropriate Installation & Maintenance

5 (I&M) work group. If the ticket needs to be handled by a Central Office

6 (CO) field work group, LMOS passes the ticket to the Work Force

7 Administration (WFA) - Dispatch In module, which loads the ticket to the

8 next available CO technician. No distinction is made in priority between

9 trouble tickets related to CLEC customers versus tickets related to

10 BellSouth retail customers.

11

12 Exhibit OSS-53 provides examples of the screens seen by both CLEC and

13 BellSouth repair attendants for a trouble report involving the call

14 forwarding feature. The function and sub-function menus included in

15 Exhibit OSS-53 provide an indication of the depth of TAFI's abilities to

16 process troubles. The nature of the trouble report determines which of the

17 numerous screens would be seen by both CLEC and BellSouth repair

18 attendants. No matter what the situation, both CLEC and BellSouth repair

19 attendants have the same access through TAFI to the same information

20 and functions.

21

22 Q. CAN TAFI BE USED FOR TROUBLE REPORTS ON COMPLEX

23   SERVICES?

24

1   A.   Yes, in part. For trouble reports on complex services that involve

2   exchange services, such as Centrex® service or PBX trunks, TAFI can be

3   used to input trouble reports, obtain commitment times, and check the

4   status of previously entered reports. The full range of TAFI functionality,

5   however, is not available for these services.

6

7   Q.   IS THERE MORE INFORMATION ON TAFI AVAILABLE SHOULD THE

8   AUTHORITY NEED SUCH?

9

10 A.   Certainly. For a more technical description of TAFI's functionality, please

11   see the *TAFI Functionality Overview*, attached as Exhibit OSS-54, the

12   *CLEC TAFI End User Training Manual* (Exhibit OSS-34), and the *CLEC*

13   *TAFI User Guide* (Exhibit OSS-35).

14

15 Q.   HOW DO CLECS CONNECT TO TAFI?

16

17 A.   BellSouth provides two ways for CLECs to connect to TAFI: Dedicated

18   Local Area Network (LAN-to-LAN) connections (the same kind of access

19   that BellSouth uses); and Dial-up connections, for CLECs that choose not

20   to use LAN-to-LAN connections. CLECs pay for their costs of arranging

21   access connections, just as BellSouth does for itself.

22

23   TAFI "times out" for no activity after 10 minutes for both BellSouth and

24   CLEC users. TAFI was designed to time out if it is not used actively for 10

25   minutes, so as not to waste central processor unit time.

1

2   Q: HOW ARE CLEC END-USERS' REPAIR CALLS HANDLED BY

3   BELLSOUTH?

4

5   A.   If a CLEC end-user calls BellSouth directly regarding a repair or

6   maintenance matter, the BellSouth repair service center personnel are

7   notified by the system that the record is a CLEC record, and are instructed

8   to re-direct any reports to the CLEC in a manner specified by the CLEC.

9   As stated earlier, if TAFI determines that a trouble report must be

10   dispatched downstream, the downstream center or field work group

11   makes no distinction in priority between CLEC and BellSouth tickets.

12

13 Q.   HAS BELLSOUTH ENHANCED TAFI IN ANY WAY?

14

15 A.   Yes. BellSouth developed an enhanced owner validation process in

16   December 1997 that enables CLECs to use TAFI to open tickets for

17   troubles reported on the same day that the end user is switched to a

18   CLEC, but before the order completion has posted to the billing record.

19   This process uses pending service order data to validate that the CLEC is

20   the "owner" of the end user's account.

21

22   Until October 1999, TAFI permitted the entry of 10-character length

23   telephone numbers. Any services with telephone numbers longer than 10

24   characters had to be entered in LMOS. In October 1999, the length was

increased to allow 18 characters. This increase enables CLECs to open
trouble tickets for Multiline, DID, and Hunt Groups.

In September 2000, BellSouth enhanced TAFI in order to accommodate
DLECs' reports for trouble conditions related to high speed data
communications (line sharing) to a BellSouth voice end user. Because the
full functionality is not necessary for a DLEC to report troubles related to
line sharing, and because BellSouth is responsible for reporting troubles
related to the voice service, DLECs (including CLECs acting as DLECs in
this situation) use a subset of TAFI's functionality. For line sharing
troubles, a DLEC user may:

- enter a line sharing data trouble report
- modify an existing line sharing report
- obtain MLT test results
- view trouble history data
- request a vendor meet.

In June 2001, MCI/WorldCom submitted change request CR0421 to
extend the expiration date for TAFI and LENS passwords. Currently, the
passwords expire after 60 days. MCI/WorldCom would like to lengthen
the expiration date to a year.

Q.   CAN CLECS USE TAFI FOR UNES?

1   A.   Yes. From a maintenance and repair perspective, port/loop combinations

2   (UNE-P) are treated as basic local exchange service and TAFI will

3   correctly process trouble reports on them.   After determining that the

4   problem is not in the customer's equipment or the CLEC's network, the

5   CLEC can use TAFI to handle troubles associated with UNEs that can be

6   identified with a telephone number, such as unbundled ports or interim

7   number portability.   TAFI sends trouble reports for such UNEs to the

8   Customer Wholesale Interconnection Network Service ("CWINS") Center

9   for manual handling.

10

11 The Electronic Communications Trouble Administration ("ECTA") Gateway

12

13   Q.   DESCRIBE THE ECTA GATEWAY.

14

15   A.   ECTA is a machine-to-machine interface, built to the American National

16   Standards Institute (ANSI) national standards for Trouble Administration:

17   T1.227-1995, T1.228-1995, T1.227A-1998 and T1.282-1998. This

18   interface allows the CLEC to (1) enter a trouble report, (2) modify an

19   existing trouble report (initiated by the gateway), (3) obtain status

20   information on open trouble reports, (4) close an existing trouble report

21   and (5) request and obtain MLT test results for a line without generating a

22   trouble report.   ECTA interfaces with both of BellSouth's maintenance and

23   repair OSSs - LMOS for non-designed services and WFA for designed

24   services.

25

1   Since December 1995, BellSouth has offered CLECs nondiscriminatory,

2   machine-to-machine access to the WFA system via the IXC Electronic

3   Communications Trouble Administration ("ECTA") Gateway using the

4   same industry standard used by interexchange carriers to report troubles

5   on access services. This gateway gives CLECs the ability to report

6   troubles for designed (circuit-ID-based) services, such as resold complex

7   private line services, or designed UNEs, or interconnection trunking. No

8   CLEC has chosen to use the capability provided by the IXC ECTA

9   Gateway.

10

11   In November 1997, BellSouth also began offering CLECs machine-to-

12   machine access through the Local ECTA Gateway using industry

13   standards for the exchange trouble reporting and notification information.

14   To comply with a new industry standard, ECTA was enhanced on October

15   28, 1999, to provide CLECs with the ability to request a mechanized loop

16   test ("MLT") without generating a trouble report. Currently, ECTA Local

17   provides industry-standard nondiscriminatory access to the BellSouth's

18   maintenance OSS for both telephone-number services (LMOS) and

19   nondiscriminatory access for circuit-identified services - i.e., designed and

20   non-designed services (WFA). ECTA Local supports both resold services

21   and UNEs. Some CLECs may refer to ECTA Local as an "electronic

22   bonding" maintenance and repair interface.

23

24   The *ECTA Start-Up Guide* is attached as Exhibit OSS-55. This guide

25   provides CLECs with an overview of the ECTA gateway, including a

1 discussion about the appropriate ANSI standards. It supplements the

2 generic Joint Implementation Agreement for Electronic Communications

3 Trouble Administration Gateway for Local Service Between CLEC and

4 BellSouth Telecommunications, Inc., which is attached as Exhibit OSS-56.

5

6 In the Georgia Test, KPMG found that BellSouth satisfied all of the test

7 criteria for functional testing and capacity management evaluation of

8 ECTA, (MTP, at VII-B-7 – VII-B-9; VII-F-6 – VII-F-13; STP, at VI-C-7 – VI-

9 C-12, attached to Milton McElroy's testimony as Exhibit MM-3).

10

11 Q.   WHAT FUNCTIONS ARE AVAILABLE TO USERS OF ECTA LOCAL?

12

13 A.   Following the industry standard for local exchange trouble reporting and

14   notification, the functions available to users of ECTA Local are:

15   • the ability to enter a report;

16   • the ability to modify a report;

17   • the ability to obtain status information during the life of the report;

18   and

19   • the ability to cancel a report.

20   • when repairs are complete and service has returned to normal, an

21   automatic notice is sent to the CLEC.

22   • The ability to request and obtain Mechanized Loop Testing ("MLT")

23   test data.

24

25 Q.   PLEASE DESCRIBE ECTA LOCAL "PHASE II."

1

2　A.　ECTA Local "Phase II" was implemented on June 25, 1999. This

3　　　implementation was "transparent" to the CLECs using ECTA Local - that

4　　　is, there was no need for them to rewrite their side of the interface. Phase

5　　　II added the ability for CLECs to report troubles for non-designed UNE

6　　　loops. Non-designed loops are identified by a circuit ID and are supported

7　　　in LMOS (that is, they are not supported in WFA and TAFI, even though

8　　　designed UNEs with circuit IDs are handled in WFA and CLECs could

9　　　report for designed UNEs through ECTA from its inception). Phase II also

10　　　enhanced BellSouth's ability to mechanize the analysis of certain line

11　　　troubles.

12

13　Q.　HAVE ANY CLECS USED ECTA LOCAL?

14

15　A.　Yes. The ECTA Local interface was implemented pursuant to AT&T's and

16　　　MCI's Interconnection Agreements, which specifically required an industry

17　　　standard machine-to-machine interface for maintenance and trouble

18　　　reporting rather than the non-standard functionality of TAFI. MCI

19　　　WorldCom began sending trouble reports through ECTA Local on July 27,

20　　　1998, and now averages fewer than 50 reports a month. Sprint completed

21　　　end-to-end testing of ECTA on November 30, 1999, but has not yet

22　　　chosen to transmit any reports. AT&T implemented ECTA Local in mid-

23　　　March, 1998. Shortly thereafter, apparently for internal business reasons,

24　　　AT&T advised BellSouth that it had ceased sending trouble reports via

25　　　ECTA Local and would report troubles manually. Although AT&T has

1   indicated to BellSouth in 2000 and 2001 that it was interested in resuming

2   use of ECTA, it has not yet done so. BellSouth started testing in the

3   summer of 2001 with a fourth CLEC to implement ECTA.

4

5   BILLING

6

7   Q.   WHAT HAS THE FCC HELD WITH RESPECT TO BILLING?

8

9   A.   The FCC Rules state (at §51.5) that "[b]illing involves the provision of

10   appropriate usage data by one telecommunications carrier to another to

11   facilitate customer billing with attendant acknowledgments and status

12   reports. It also involves the exchange of information between

13   telecommunications carriers to process claims and adjustments."

14

15   Q.   DOES BELLSOUTH PROVIDE CLECS WITH NONDISCRIMINATORY

16   ACCESS TO BILLING?.

17

18   A.   Yes. The testimony of David Scollard describes in depth BellSouth's

19   nondiscriminatory access to billing provided to CLECs.

20

21   Q.   PLEASE SUMMARIZE YOUR TESTIMONY WITH RESPECT TO

22   BELLSOUTH'S PROVISION OF NONDISCRIMINATORY ACCESS TO

23   OSS.

24

A.   BellSouth's interfaces, processes, and procedures provide CLECs with access to the required OSS information and functions in substantially the same time and manner as BellSouth's access for its retail customers, and therefore conform to the FCC's definition of nondiscriminatory access.

II.   THE REGIONALITY OF BELLSOUTH'S OSS

Q.   HOW DOES THE FEDERAL COMMUNICATIONS COMMISSION ("FCC") SAY A BOC MAY DEMONSTRATE "SAMENESS" OF ITS OSS?

A.   The FCC has determined that, as to electronic OSS processes, a BOC may demonstrate "sameness" by showing that CLECs either use the identical system across different states or that CLECs use separate systems that "reasonably can be expected to behave the same way." See Kansas/Oklahoma Order ¶ 111. As to manual processes, the FCC has emphasized evidence showing that those components operate pursuant to a common organizational structure, common methods and procedures, and common training. See id. ¶ 113.

In short, the FCC has defined "same" to mean that "competing carriers in [multiple states] share the use of a single OSS: a common set of processes, business rules, interfaces, systems, and in many instances, even personnel." See Kansas/Oklahoma Order ¶ 111.

1   Q.   DOES BELLSOUTH PROVIDE ONE REGIONAL SET OF INTERFACES

2   THAT CLECS USE TO REQUEST RESALE AND UNE SERVICES?

3

4   A. Yes. As described in this testimony and in the testimony of Ken Ainsworth,

5   BellSouth provides CLECs with one set of electronic and manual

6   interfaces for all CLEC resale and UNE service requests throughout

7   BellSouth's nine-state region – all of which provide nondiscriminatory

8   access to BellSouth's OSS. Very simply put, a CLEC in Tennessee uses

9   the same interfaces for access to the same BellSouth OSS as a CLEC in

10   any other state in BellSouth's region. There is only one

11   Telecommunications Access Gateway ("TAG"), RoboTAG™, Electronic

12   Data Interchange ("EDI"), Local Exchange Navigation System ("LENS"),

13   Trouble Analysis and Facilitation Interface ("TAFI"), Electronic

14   Communications Trouble Administration ("ECTA"), Optional Daily Usage

15   File ("ODUF"), Enhanced Daily Usage File ("EODUF"), and Access Daily

16   Usage File ("ADUF"). [15]

17

18   To the extent that there are separate servers for processing CLEC

19   requests via these interfaces, the servers use the same programming

20   code and are designed to operate in an indistinguishable manner. The

21   servers use the same type of hardware running identical software. [16]

---

[15] Each interface, including an explanation of the acronym, is described in this testimony. For certain interfaces, i.e. TAG, there are multiple versions of regional software deployed. A CLEC uses a single version of the interface for placing orders within multiple states in the region.

[16] [16] "Where SWBT has discernibly separate OSS, SWBT demonstrates that its OSS reasonably can be expected to behave the same way in all three states. As described below, for example, the use by SWBT of two different order processing systems (a SORD processor in Dallas for retail and wholesale orders in Texas, and a SORD processor in St. Louis for retail and wholesale orders in SWBT's other four in-region states) use the same programming code and, moreover, are designed to operate in an indistinguishable manner." See Kansas/Oklahoma Order ¶ 111.

1   Attached to this testimony is Exhibit OSS-69, which describes the

2   electronic interfaces used by CLECs, the databases used exclusively by

3   CLECs, the OSS shared by CLECs and BellSouth, the function of each,

4   the location of the server or servers, and the geographical responsibility of

5   each of these applications.

6

7   Additionally, service requests can be submitted manually (via fax

8   machine) by CLECs throughout the BellSouth region, using the same

9   national industry-standard OBF guidelines and business rules. (Note: In

10   some cases, the OBF guidelines have been modified for BellSouth-

11   specific situations. Regardless, such modifications themselves are

12   regional in scope.)

13

14 Q. PLEASE BRIEFLY DESCRIBE THE ELECTRONIC INTERFACES YOU

15   REFERENCED IN YOUR PREVIOUS ANSWER.

16

17 A. A complete overview of these interfaces in contained in Section I of this

18   testimony; however, for ease of reference, I will again briefly describe the

19   interfaces BellSouth provides to CLECs.

20

21   Telecommunications Access Gateway ("TAG") – An electronic interface

22   that provides a standard Application Programming Interface ("API") to

23   BellSouth's pre-ordering and ordering OSS. Based upon industry-

24   standard pre-ordering Common Object Request Broker Architecture

25   ("CORBA") and, for ordering, the industry-standard OBF guidelines for

1   CLEC LSRs. TAG pre-ordering can be integrated with TAG ordering, with

2   the CLEC having the responsibility for the integration.

3

4   RoboTag™ - An electronic Web-based interface to TAG, offered by

5   BellSouth as an alternative for CLECs who have made the decision not to

6   hire programmers to develop and maintain their own interface to TAG.

7   Resides on a CLEC's Local Area Network ("LAN") server.

8

9   Electronic Data Interchange ("EDI") – Electronic interface to BellSouth's

10   ordering OSS, which follows an industry-standard data transmission

11   protocol (EDI) for ordering, and the industry-standard OBF guidelines for

12   LSR formatting. EDI can be integrated with TAG pre-ordering to create

13   full pre-order/order functionality.

14

15   Local Exchange Navigation System ("LENS") – A non-integrateable Web-

16   based electronic graphical user interface (GUI"), that requires software

17   development only on BellSouth's side of the interface. Now a GUI to TAG,

18   LENS, therefore, uses the TAG architecture and gateway for pre-ordering

19   and ordering functionality. A LENS user must have, at a minimum, a

20   personal computer, Web browser software, an Internet connection and a

21   password from BellSouth.

22

23   Trouble Analysis and Facilitation Interface ("TAFI") – Direct interface to

24   BellSouth's systems for trouble reporting and tracking. For use with Plain

25   Old Telephone Services ("POTS").

Electronic Communications Trouble Administration ("ECTA") – Interface to BellSouth's systems for trouble reporting and tracking. Unlike TAFI, a CLEC's representative interacts with the CLEC's own computer software, which, in turn, interacts with the BellSouth OSS. Also for use with POTS.

Optional Daily Usage File ("ODUF") – Provides CLECs with usage records for billable call events recorded by BellSouth's central offices. Includes details (e.g., directory assistance, intraLATA toll, billable feature activations) for resold lines, Interim Number Portability ("INP") accounts, and unbundled switch ports.

Enhanced Daily Usage File ("EODUF") – Provides CLECs with usage data for local calls originating from resold flat-rate business and residential lines. Usage data includes date of call, 'from' number, 'to' number, connect time, conversation time, rate class, message type, billing indicators and 'bill to' number.

Access Daily Usage File ("ADUF") – Provides CLECs with records for billing interstate access charges to interexchange carriers for calls originating from, and terminating to, unbundled ports. Arranged on a contractual basis.

1   Q.   ARE CLEC REQUIREMENTS FOR USING BELLSOUTH'S

2   ELECTRONIC AND MANUAL INTERFACES THE SAME THROUGHOUT

3   THE NINE-STATE BELLSOUTH REGION?

4

5   A.   Yes. BellSouth has produced and published a comprehensive set of

6   business rules, guides, procedures, information and job aids for CLECs.

7   This includes only one regional set of user guides for the electronic

8   interface. This information is used by the CLECs – regardless of their

9   locations – to educate, inform and assist in the configuration of CLEC

10   systems that will interface with BellSouth's regional OSS. For example,

11   business rules for pre-ordering and ordering are provided in BellSouth's

12   regional *BellSouth Pre-Order Business Rules and BellSouth Business*

13   *Rules for Local Ordering*. These documents serve as the basis for the

14   CLEC's pre-ordering and ordering interactions with BellSouth, whether the

15   CLECs serve end users in Tennessee or any of the other states in

16   BellSouth's region. In other words, BellSouth does not provide separate

17   documents for different states in its region, nor does it include separate

18   sections or pages that apply to specific states within the business rules.

19

20   In addition to regional documentation, BellSouth provides regional training

21   programs for CLECs. Training content is the same for all CLECs for all

22   interfaces and forms, regardless of the states in which the CLECs serve

23   end users.

24

1 Q.   ARE CLECS REQUIRED TO BUILD AN ELECTRONIC INTERFACE FOR

2   EACH STATE OF BELLSOUTH'S OPERATING REGION IN WHICH THE

3   CLEC SERVES END USERS?

4

5 A.   No. All of BellSouth's pre-ordering and ordering interfaces for CLECs are

6   regional. If CLECs choose to use the machine-to-machine TAG or EDI

7   interfaces, they do not build discreet TAG or EDI interfaces for each state

8   in BellSouth's region. Once a CLEC has constructed its side of the

9   ordering interface, or if the CLEC chooses to use the human-to-machine

10   LENS interface, the CLEC can use it to submit LSRs for end users in any

11   or all states in BellSouth's region. BellSouth's side of the gateway

12   consists of a single system that receives LSRs for the CLECs' end users

13   in any of BellSouth's nine states.

14

15 Q.   CAN CLECS SUBMIT LSRS ORDERING SERVICE FOR END USERS IN

16   MULTIPLE STATES WITHIN BELLSOUTH'S REGION THROUGH ANY

17   OF BELLSOUTH'S INTERFACES?

18

19 A.   Yes. Regardless of the CLEC's location, all transaction queries, such as

20   the pre-ordering queries sent by the CLEC via the electronic interfaces,

21   result in BellSouth's OSS returning the same information for end users

22   residing in any one of the nine states of BellSouth's region. When, for

23   example, a CLEC retrieves a CSR for an end user in Tennessee, the

24   CLEC follows the same process in BellSouth's pre-ordering interface that

25   it would when retrieving a CSR for an end user in any other state. The

result of any CSR request, moreover, is presented in identical format, regardless of the state in which the end user is located. If a CLEC submits LSRs for end users in Tennessee or Georgia for resale lines with features, the LSRs will be identical (assuming the features are the same) with the exception of customer-specific (not state-specific) fields such as "telephone number," "address," and "city/state/zip code," etc. Exhibit OSS-70 includes a CLEC's service requests for end users in Tennessee and Georgia and the resulting service orders, also from Tennessee and Georgia LSRs reflect the following identical fields:

- "ACT" or activity type of "N" for new
- "REQTYP" or requisition type of "EB" for resale.
- "TOS" or type of service
- the "CC" field or CLEC company code is identical.

The remaining fields are customer-specific such as the fields for addresses or features. The service orders, which result from clean and correct LSRs reaching BellSouth's service order processor, SOCS, contain the same Universal Service Order Codes ("USOCs") as those specified on the LSR (Exhibit OSS-70). For example, all appropriate features listed in the "Feature detail" section of the LSR appear on the appropriate page of the related service order.

When obtaining provisioning information from CSOTS, CLECs use the same procedure for accessing a list of service orders for Tennessee-specific end-users that they would for end users in Georgia or any other

1   state in the region. If the CLEC does business in several states in the

2   region, it can retrieve a single list for its end users in those states.

3

4 Q.   IS IT IMPORTANT THAT CLECS BE AWARE OF HOW TO CORRECTLY

5   POPULATE BELLSOUTH'S INDUSTRY STANDARD LSR?

6

7 A.   Yes. To ensure the highest degree of accuracy possible, CLECs must

8   produce clean and correct LSRs by populating the correct data, for

9   example, in the fields for area codes, addresses, and various tariffed

10   services. The data contained in these fields is obviously different not only

11   across state lines, but also for different customers, different customer

12   locations and different cities. The selected interface for transmitting the

13   information, as well as the rules governing the completion of the LSR,

14   however, are identical, regardless of the state for which the request is

15   submitted. BellSouth's business rules for pre-ordering and ordering are

16   identical throughout the region. The selected interface for transmitting the

17   information, as well as the Rules governing the completion of the LSR, are

18   identical, regardless of the state for which the request is submitted.

19   However, CLECs may have to populate different information on industry-

20   standard LSRs for end users in different parts of one state or in different

21   states within BellSouth's region.

22

23 Q.   DOES BELLSOUTH HAVE A SINGLE SET OF UNIVERSAL SERVICE

24   ORDER CODES ("USOCS") THAT IS REQUIRED ACROSS ALL NINE

25   STATES?

1

2   A.   Yes. BellSouth utilizes a single set of USOCs across the nine-state

3   region. "1FR" indicates a flat rate residential line in all nine states.

4   "UNETW" indicates an Unbundled Network Terminating Wire in all nine

5   states. "ESX" indicates call waiting in all nine states. However, state-

6   specific USOCs or Field Identifiers ("FID") may arise as a result of

7   regulatory differences. For example, CREXN indicates Customized Code

8   Restriction, residence/business line, PBX trunk option #5 in four states

9   only.

10

11 Q.   ONCE A CLEC IS CERTIFIED TO DO BUSINESS IN ONE STATE

12   WITHIN BELLSOUTH'S REGION, MUST THE CLEC BE "RE-

13   CERTIFIED" IN PRODUCTION STATUS PRIOR TO SUBMITTING LSRS

14   FOR THE ADDITIONAL STATES IN BELLSOUTH'S REGION?

15

16 A.   No. BellSouth has no requirement that a CLEC be "re-certified" to submit

17   LSRs in additional states after it has been is certified to do business in its

18   first state in the nine-state region. CLECs, however, should not submit

19   LSRs for end users in additional states without first doing their

20   "homework." Each CLEC is responsible for completely and accurately

21   populating its LSRs, for knowing the product and regulatory differences

22   that may apply in the "new" state, and for attaining the billing codes that

23   are applicable to the "new" state.

24

1 Q.   ARE INDIVIDUAL USER GUIDES FOR EACH BELLSOUTH

2   ELECTRONIC INTERFACE AVAILABLE AND APPLICABLE ON A

3   REGIONAL BASIS?

4

5 A.   Yes. BellSouth provides only one regional set of User Guides for each

6   electronic interface, and such guides are posted on BellSouth's online

7   Website[17].

8

9 Q.   DO ALL TRANSACTION QUERIES SEARCH AND RETURN THE SAME

10   INFORMATION FOR END USERS RESIDING IN ALL NINE STATES IN

11   BELLSOUTH'S REGION, REGARDLESS OF THE CLEC'S LOCATION?

12

13 A.   Yes. Access to BellSouth's pre-order functionality providing access to

14   Customer Service Records ("CSRs") is an example. A competing carrier

15   retrieving a CSR for an end user in Tennessee follows the same process

16   in BellSouth's pre-ordering interface as a CLEC retrieving a CSR for an

17   end user in any other state. Moreover, the result of any CSR request is

18   presented in identical format, regardless of the state location of the end

19   user.

20

21 Q.   ARE THERE OTHER EXAMPLES TO DEMONSTRATE THAT

22   BELLSOUTH'S ELECTRONIC INTERFACES PROVIDE THE SAME

23   FUNCTIONALITY ACROSS THE NINE-STATE REGION?

24

---

[17] www.interconnection.bellsouth.com.

1   A.   Yes. For example, a CLEC desiring more information on retrieving service

2   order lists for posted orders needs only to review BellSouth's Web-based

3   *CLEC Service Order Tracking System* ("CSOTS") *User Guide.* The same

4   procedure is used whether the CLEC is accessing service order lists for

5   Tennessee or specific end-users in any other state. In fact, a CLEC

6   serving end users in multiple BellSouth states can retrieve a service order

7   list for the entire region. If a list is desired for one or more of the individual

8   states, the CLEC can then request a separate service order list for each

9   state by clicking the Web option for such a list.

10

11 Q.   DOES BELLSOUTH PROVIDE CLECS ACCESS TO THE SAME PRE-

12   ORDERING, ORDERING, AND PROVISIONING OSS ACCESSED BY

13   BELLSOUTH'S TWO RETAIL MARKETING AND SALES SUPPORT

14   SYSTEMS, REGIONAL ORDERING SYSTEM ("ROS") AND REGIONAL

15   NEGOTIATION SYSTEM ("RNS")?

16

17 A.   Yes. BellSouth provides CLECs with access to the same pre-ordering,

18   ordering, and provisioning OSS accessed by RNS and ROS through the

19   machine-to-machine TAG and EDI (EDI does not currently provide pre-

20   ordering functionality, but CLECs using EDI may utilize TAG for the pre-

21   ordering function). There are no separate OSS established for CLECs,

22   e.g., regional street and address database, customer service record

23   database, local facility assignment systems, service order communications

24   system, etc. The same OSS are used for both CLEC and BellSouth retail

25   service requests.

1

2   Additionally, BellSouth provides CLECs with all the specifications

3   necessary for integrating the BellSouth interfaces. A CLEC may integrate

4   ordering with pre-ordering functions by integrating the TAG pre-ordering

5   interface with EDI ordering interface, or by integrating TAG pre-ordering

6   with TAG ordering. CLECs interested in integrating the pre-ordering and

7   ordering systems with their own internal systems must, of course, have

8   their own internal OSS, and have responsibility for that integration. By

9   using the integrateable interfaces, CLECs can customize their own

10   marketing and sales support systems to perform functions such as

11   automatic telephone number selection, Primary Interexchange Carrier

12   ("PIC")/Local Primary Interexchange Carrier ("LPIC") searches, and credit

13   checks. Integrateable interfaces allow CLECs to design the appearance

14   and "feel" of their marketing and sales support systems as they see fit, just

15   as BellSouth designs its own retail systems for its "feel" and desired

16   appearance. Because these CLEC's marketing and sales support

17   systems integrate the electronic interfaces with the CLEC's own internal

18   OSS, CLECs can use information obtained via the electronic interfaces to

19   build their own databases, such as databases of their own customer

20   service records.

21

22 Q.   IS BELLSOUTH'S OSS VOLUME AND SYSTEM UTILIZATION

23   MANAGED ON A NINE-STATE BASIS FOR CAPACITY PLANNING?

24

1   A.   Yes. As part of its regionalized OSS operational management, BellSouth

2   manages and tracks the OSS volume and system utilization for capacity

3   management on a nine-state basis. BellSouth also manages its software

4   development and overall capacity monitoring on a regional basis.

5

6   Thus, OSS design, development, modification and performance is

7   supported on a nine-state regional basis. Support centers for the

8   processing and oversight of CLEC service requests, including provisioning

9   and repair, are regional centers, as confirmed in the testimony of Kenneth

10   Ainsworth.

11

12 Q.   DO BELLSOUTH PERFORMANCE MEASUREMENTS REFLECT THE

13   REGIONALITY OF BELLSOUTH'S OSS?

14

15 A.   Yes. BellSouth's interfaces and OSS are regional. The processes for

16   extracting, calculating, and reporting performance measurements are the

17   same for each state. The best indicator, therefore, of OSS performance in

18   Tennessee is the measurements currently posted on BellSouth's Web

19   site.

20

21 Q.   HAS ANY INDEPENDENT THIRD PARTY AUDITED BELLSOUTH'S

22   ATTESTATION OF OSS REGIONALITY?

23

1   A. Yes. BellSouth engaged PwC to perform an OSS regionality evaluation.

2   PwC rendered an affirmative opinion in the Comparability Report, which is

3   discussed in detail in the testimony of Milton McElroy.

4

5   **PART C: SUMMARY AND RECOMMENDATIONS FOR THE AUTHORITY**

6

7   Q.   PLEASE SUMMARIZE YOUR TESTIMONY?

8

9   A.   In my testimony, I have described BellSouth's interfaces, processes, and

10   procedures that provide CLECs access to the required OSS information

11   and functions in substantially the same manner as BellSouth's access for

12   its retail customers, and therefore conform to the FCC's definition of

13   nondiscriminatory access.   Further, I have shown that BellSouth's OSS

14   provides CLECs with:

15   • region-wide electronic and manual ordering interfaces that

16   provide uniform functionality;

17   • region-wide comprehensive set of user guides, procedures,

18   information, and job aids for the use of the electronic and

19   manual ordering interfaces; and

20   • region-wide business rules with extensive training.

21

22   Additionally, BellSouth's OSS are designed, developed, modified, and

23   measured for performance on a region-wide basis to operate in an

24   indistinguishable manner whether a CLEC is in Tennessee, Georgia or

1   any of the other seven states in the BellSouth region. PwC has evaluated

2   and confirmed BellSouth's assertion that its OSS are regional in nature.

3

4   In conclusion, based upon these factors, BellSouth respectfully submits

5   that the Authority can rely on the independent third party test performed in

6   Georgia, the PwC Comparability Report regarding the regionality of

7   BellSouth's OSS, and the evidence of actual commercial usage, to

8   determine that BellSouth provides nondiscriminatory access on a region-

9   wide basis to its OSS in Tennessee.

10

11   Q.   DOES THIS CONCLUDE YOUR TESTIMONY?
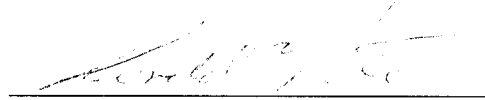
12

13   A.   Yes.

14

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for

the State and County aforesaid, personally came and appeared Ronald M. Pate –Director –

Interconnection Operations, BellSouth Telecommunications Inc., who, being by me first duly

sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket

No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the

Authority and duly sworn, his testimony would be set forth in the annexed testimony

consisting of _190_ pages and _77_ exhibit(s).

_____

Ronald M. Pate

Sworn to and subscribed
before me on October 22, 2001

_____
NOTARY PUBLIC

Notary Public, Cobb County, Georgia
My Commission Expires June 19, 2005