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February 27, 2004

Honorable Deborah Taylor Tate
Chairman, Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re. *Triennial Review Order - 9 Month Proceeding - Hot Cuts*
Docket No. 03-00526

Dear Chairman Tate

Enclosed for filing is the 1 CD Rom and 4 copies of the Direct Testimony of Mark Van De Water on behalf of AT&T in the above-captioned proceeding.

If you have any question, please contact me.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry Walker

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BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

IN RE:

IMPLEMENTATION OF THE FEDERAL COMMUNICATIONS COMMISSION'S TRIENNIAL REVIEW ORDER – 9 MONTH PROCEEDING – HOT CUTS)	)))	DOCKET NO. 03-00526

DIRECT TESTIMONY OF MARK DAVID VAN DE WATER

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC

FEBRUARY 27, 2004

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Mark David Van de Water. My business address is 7300 East Hampton Avenue, Room 1102, Mesa, AZ, 85208-3373.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY.

A. I hold a Bachelors of Arts in Psychology and a Masters of Arts in Organizational Management. I am employed by AT&T, operating in Tennessee as AT&T of the South Central States, LLC ("AT&T"). For the past 5 years I have worked in the Local Services and Access Management organization of AT&T with responsibility for negotiating and implementing operational support system ("OSS") requirements and interfaces, and for resolving operational issues between AT&T Local Services and Southwestern Bell Corporation ("SBC"). In particular, I participated with SBC in formalizing their documented coordinated and uncoordinated unbundled network element-loop ("UNE-L") with local number portability ("LNP") hot cut processes. During 2003, I negotiated with SBC, on a business-to-business basis, to create a process by which AT&T is able to convert multiple unbundled network element-platform ("UNE-P") customers to UNE-L. A trial is currently being conducted of this process. Further, this process is the foundation of SBC's current "batch" hot cut proposal presented throughout its 13-state region. Before this assignment, I worked for over 16 years at Western Electric Company in various positions.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE REGULATORY COMMISSIONS?

A. Yes. I have testified before the California, Kansas, Missouri, Illinois, and Texas commissions in matters related to SBC's applications for in-region long distance authority

under Section 271 of the Federal Telecommunications Act of 1996. I have also testified in California in the Triennial Review proceeding.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address the operational constraints associated with the hot cut process, to describe issues this Commission should consider in developing any bulk migration process for unbundled loops, and to recommend the parameters that should be included in any bulk migration process. My testimony covers four key areas in this proceeding.

First, I address the operational and economic barriers presented by the hot cut process. This section of my testimony explains the findings of the Federal Communications Commission ("FCC") in the Triennial Review Order ("TRO").[1] It summarizes the FCC's conclusions that competitive carriers are impaired without access to unbundled local switching as a result of economic and operational impairment due to the hot cut process and describes the FCC's directions to state commissions to approve and implement a batch loop migration process.

Second, I describe the specifics of the current hot cut process and AT&T's experience with hot cuts in the BellSouth region.

Third, I describe the challenges that must be addressed in implementing any batch loop migration process. I address the volume of hot cuts that will be required and the evaluation standards by which any batch migration process should be considered. My testimony discusses the number of UNE-L hot cuts that should be expected if unbundled

[1] *Report and Order and Order on Remand and Further Notice of Proposed Rulemaking*, In the matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Federal Communications Commission, CC Docket No 01-338, Released August 21, 2003 (hereafter referred to as the "Triennial Review Order" or "TRO")

local switching is no longer available and the segments of the market that pose unique challenges for development of a bulk migration process. My testimony also addresses new operational constraints that will arise if customer conversions require migration of a loop because unbundled local switching is no longer available to Competitive Local Exchange Carriers ("CLECs").

Fourth, my testimony includes recommendations for a batch hot cut process. Because CLECs have restricted insight into the operations of the Incumbent Local Exchange Carrier ("ILEC"), this recommended process addresses the parameters of a reasonable batch migration process. Development of a batch hot cut process rests primarily with the ILECs, in cooperation with the CLECs. Further, while my testimony points out the advantages of its recommended process, it also illustrates why no manually based process is capable of ensuring the seamless, low cost migration of loops that is required by the TRO and is equivalent to the ease and efficiency with which customers are migrated today when changing LD carriers and when using the unbundled network element platform.

I. BACKGROUND: THE OPERATIONAL AND ECONOMIC BARRIERS PRESENTED BY THE CURRENT HOT CUT PROCESS

Q. WHAT IS A HOT CUT?

A. When a mass-market (residential and small business) customer seeks to move his or her local service from one switch-based carrier to another, the connection between the customer's analog loop and the original carrier's switch must be broken and a new connection must be established between that analog loop and the new carrier's switch. Because the customer's loop is lifted or "cut" while it still provides active service to a customer (i.e., the loop is "hot"), the process used to transfer analog loops has become known as a "hot cut." The hot cut process involves two separate changes to the customer's

service that must be coordinated to occur at approximately the same time: (1) the manual transfer of the customer's analog loop from one carrier's network to another's (the loop cut); and (2) the porting of the customer's telephone number (including the associated software changes and the disconnection of the original carrier's switch translations), so that inbound calls to the customer can be routed to the new carrier's switch using the customer's existing telephone number.

Q. DOES A HOT CUT CAUSE THE CUSTOMER TO LOSE SERVICE?

A. Yes. This occurs in two ways. The first is a complete loss of dial tone. From the time the customer's analog loop is disconnected from the ILEC's switch until it is reconnected to the CLEC's switch, the customer has no dial tone and is completely out of service. Second, from the time the customer's analog loop is reconnected to the CLEC's switch until the customer's number is successfully ported to the CLEC's switch, the customer cannot receive any incoming calls. That is because, until the appropriate change message is received by the Number Portability Administration Center ("NPAC"), the NPAC database indicates that calls should be routed to the ILEC's switch. If someone calls the customer and the calls are sent to the ILEC's switch after the customer's analog loop has been physically moved, the call will not complete and the caller will be unable to reach the customer.

Q. HOW DID THE FCC ADDRESS THE ISSUE OF HOT CUTS?

A. In short, it concluded that hot cuts cause impairment. In the TRO, the FCC reviewed substantial data and descriptions of this hot cut process provided by both ILECs and CLECs and found, on a national basis, that competing carriers providing voice service to mass market customers are impaired without access to unbundled local circuit switching. TRO

¶ 459. This finding was based in part on clear evidence regarding the economic and operational barriers caused by the hot cut process. *Id.* *See also* ¶ 473 ("Our national finding of impairment is based on the combined effect of all aspects of the hot cut process on competitors' ability to serve mass market voice customers.") The FCC recognized that "whether a customer was previously being served by the competitive LEC using unbundled local circuit switching [i.e., using UNE-P], or by the incumbent itself, a hot cut must be performed" [if unbundled local switching is no longer available]. *Id.*¶ 465.

Q. DID THE FCC MAKE SPECIFIC FINDINGS?

A. Yes. The FCC found:

> "[H]ot cuts frequently lead to provisioning delays and service outages, and are often priced at rates that prohibit facilities-based competition for the mass market. The barriers associated with the manual hot cut process are directly associated with incumbent LECs' historical local monopoly, and thus go beyond the burdens universally associated with competitive entry. Specifically, the incumbent LECs' networks were designed for use in a single carrier, non-competitive environment..." Id. ¶ 465.

The FCC recognized that, as a result, "for the incumbent, connecting or disconnecting a customer is generally merely a matter of a software change. In contrast, a competitive carrier must overcome the economic and operational barriers associated with manual hot cuts." *Id*. (citations omitted).

Upon review of the evidence, the FCC concluded that the economic and operational barriers of the hot cut process include "the associated non-recurring costs, the potential for disruption of service to the customer, and our conclusion, as demonstrated by the record, that incumbent LECs appear unable to handle the necessary volume of migrations to support competitive switching in the absence of unbundled switching." *Id.* ¶ 459. The FCC further concluded that "[t]hese hot cut barriers not only make it uneconomic for competitive LECs to

self-deploy switches specifically to serve the mass market, but also hinder competitive carriers' ability to serve mass market customers using switches self-deployed to serve enterprise customers." *Id.*

Q. HOW DID THE FCC PROPOSE TO ADDRESS THESE PROBLEMS?

A. The FCC found that "[c]ompetition in the absence of unbundled local circuit switching requires seamless and timely migration not only to and from the incumbent's facilities, but also to and from the facilities of other competitive carriers." TRO ¶ 478 (citations omitted). Having reached this conclusion, the FCC indicated that "loop access barriers contained in the record *may* be mitigated through the creation of a batch cut process . . . ." TRO ¶ 487 (emphasis added). The FCC then directed state commissions to approve and implement a batch process that attempts to address the economic and operational barriers caused by hot cuts, or make detailed findings why such a process is not necessary in a particular market. *Id.* ¶ 488; *see also* ¶ 423. The FCC identified issues that must be addressed by any batch hot cut process developed, *id.* ¶ 489, and outlined the detailed findings that must be made if a state commission declines to institute a batch hot cut process for a particular market. *Id.* ¶ 490.

Q. DID AT&T EXPERIENCE THE HOT CUT IMPAIRMENTS FOUND BY THE FCC?

A. Yes. As confirmed by the FCC, AT&T's experience was that the hot cut process frequently led to provisioning delays and service outages that led to an untenable level of customer dissatisfaction. Naturally, this dissatisfaction was directed at AT&T as the retail provider of the service, not BellSouth, the underlying wholesale provider. In particular, BellSouth's provisioning delays included its substandard performance in returning timely

firm order confirmations, its failure to provide a reliable schedule for performing hot cuts, and its failure to notify AT&T consistently and timely that customer loops had been transferred to AT&T, so that AT&T could complete the final steps necessary to port the customer's telephone number to ensure the customer could receive incoming calls.[2] Factors that contributed to customer service outages included BellSouth's erroneous disconnection of end users' lines and, when erroneous disconnections occurred, undue delay in reconnection. In addition, BellSouth's high charges for hot cuts make facilities-based competition using UNE-L for mass market customers uneconomic.

Q. PLEASE DESCRIBE THE STEPS OF MIGRATING A CUSTOMER FROM AN ILEC TO A CLEC USING A HOT CUT.

A. When a CLEC seeks to use its own switch to serve mass market local customers using a UNE-L architecture, the processes needed to change local carriers are much more complex, manual and costly than for UNE-P, requiring physical work to transfer the customer's analog loop from one carrier's switch to another's. For example, the CLEC must assign the customer to facilities in its switch and equipment; both the CLEC and the ILEC must conduct a series of number porting activities; and the ILEC must perform numerous manual provisioning and testing activities in its central office and sometimes in the field. Before the CLEC even submits an order for a hot cut, the CLEC must conduct the following activities in addition to those required for a UNE-P migration:

- The CLEC negotiates a due date with the customer based on the standard intervals for loop migrations that are lengthier than UNE-P intervals. For business customers, a cutover time must also be negotiated to ensure the service outage does not impact the operation of the customer's business.

[2] Timely firm order confirmations are essential to communicate when the order is to be provisioned so that number porting activities can began and service migration can be confirmed with the customer. Late firm order confirmations also cause the customer's order to be delayed past the times originally requested by the customer

- The CLEC conducts an inventory of facilities and electronically assigns the customer's loop to specific facilities in the CLEC's switch, to equipment located in CLEC-owned collocation space and to a Connecting Facility Assignment ("CFA") that will be used by the ILEC to connect the customer's loop to the CLEC's collocated equipment.
- The CLEC accesses the ILEC's Loop Facility Assignment Control System ("LFACS") database to confirm that the availability of the CFA information in both companies' databases match.

After completing these activities, the CLEC prepares and submits the LSR. After submission of the LSR, the ILEC begins its activities.

- The ILEC checks its CFA database to ensure the CFA on the order matches its inventory.
- The ILEC issues the number portability "trigger" order by setting switch triggers which will ensure the customer receives intra-switch calls between the period of time the CLEC ports the number to its switch until the ILEC disconnects the telephone number in its switch.
- The ILEC inputs the order into its backend systems to create the internal service orders that will be needed to accomplish the migration.

Then the ILEC returns the FOC to the CLEC. Unlike UNE-P, after receiving the FOC, in a UNE-L migration the CLEC and the ILEC cannot rely on the electronic systems to flawlessly provision the service. Instead, the following complicated set of activities occurs, activities that must be coordinated if the cut is to be successful for the customer:

- The CLEC confirms with the customer the specific time and date when the hot cut is scheduled to take place based on the information in the FOC.
- The CLEC verifies that dial tone is being delivered from its switch to the CFA in the collocation cage.
- The CLEC alerts the National Number Portability Administration Center ("NPAC") that reprogramming is needed to move the customer's telephone number from the ILEC to the CLEC by sending an electronic "create" message to the Administrator. This begins the process of porting the customer's telephone number. This "create" message prompts NPAC to send a message to the ILEC to ensure the ILEC consents. The ILEC has eighteen (18) hours to respond.

After the CLEC completes these activities, the ILEC completes other activities necessary to a hot cut that are not required for a UNE-P conversion.

- The ILEC determines whether the facilities currently being used by the customer can be reused. For example, if the customer is on Integrated Digital Carrier Loop ("IDLC"), the facilities cannot be reused and spare non-IDLC facilities must be identified and assigned to this customer.
- The ILEC pre-wires the cross-connection frames.
- The ILEC confirms the presence of dial tone from the CLEC's switch on the cross-connects in the CLEC's collocation space.
- Upon receipt of the "create" message from NPAC, the ILEC will send a "concur" message back to NPAC.
- The ILEC verifies that the proper phone number is on the loop that is to be cut over.

After these activities, the ILEC contacts the CLEC to determine whether the cut can proceed as scheduled. During this call the ILEC may also provide essential information such as test results. Assuming nothing has gone wrong, on the day of the cut over, the ILEC and the CLEC will continue the following activities:

- The ILEC ensures it has the correct line for the cut.
- The ILEC verifies dial tone on the line at the ILEC Main Distribution Frame ("MDF").
- The ILEC monitors the line and, when idle, removes at the MDF the old cross connection jumper that connected the customer's loop to the ILEC's switch and terminates the pre-wired cross connection from the CLEC's CFA to the customer's loop.
- The ILEC provisioning center contacts the CLEC to advise that the conversion is complete.
- The CLEC then conducts its own tests to ensure that all lines have been successfully migrated.
- If testing is successful, the CLEC sends an "activate" message to NPAC advising that the customer's number should be ported to the CLEC's switch.
- The CLEC then calls the ILEC to accept the service.

The cut, however, is still not complete.

- Upon receipt of the activate message from NPAC, the ILEC completes the disconnect order and sends an "unlock" message for the E911 database administration to allow the CLEC access to the E911 database record for the ported number.
- Then the CLEC migrates the 911 record by updating the Automatic Location Indicator ("ALI") database to identify the CLEC as the local service provider. This ALI information supports the Public Safety Answer Point ("PSAP") that receives 911 calls.

- The ILEC must remove the old cross connections from its frame to free up the ILEC's switch port for another customer.

Only then is the hot cut complete. Not only are there significantly more steps involved in a hot cut, those steps must be coordinated if a cut is to be successful in limiting the time the customer is out of service.

To demonstrate the flow and order of activities, I have attached as Exhibit MDV-1 a process flow document for a hot cut. The first three pages show by numbered tasks the activities the ILEC must conduct to complete a hot cut. Page Four shows by lettered tasks, the activities the CLEC must complete. Beginning with Task A on Page Four, one can follow the flow of the simplest type of error-free hot cut. As the exhibit reveals, the ILEC must conduct at least twenty-three (23) separate tasks and the CLEC must conduct at least twelve (12). These tasks cannot be conducted at the same time but must move forward in a back and forth flow and often must be coordinated with the other party. In addition, I have attached to my testimony as Exhibit MDV-2 a video depicting the extensive changes to the network architecture required to perform the hot cut process, the numerous manual steps involved in the actual hot cut, and an efficient and effective alternative to the manual hot cut process.

Q. WHAT COST DOES AT&T BELIEVE IS APPROPRIATE FOR MIGRATING CUSTOMERS?

A. AT&T believes that the cost for migrating customers among providers must be based on forward-looking technology (electronic) technology, and should be as equitable as possible among types of service migrations. For example, the cost of a PIC change in BellSouth Tennessee is $3.07, and the cost of a migration to UNE-P in BellSouth Tennessee

is $1.03. Methods other than electronic provisioning of service migrations lead to discriminatory price differences that are impossible to overcome.

Q. ARE THE OPERATIONAL ISSUES YOU DISCUSS UNIQUE TO BELLSOUTH?

A. No. While, as discussed below, BellSouth has created some unique issues due to its refusal to respond reasonably to requested improvements in its hot cut process, most of the operational barriers inherent in the hot cut process exist simply because it is a burdensome manual process that must be performed on a loop by loop basis. Any manual process, by nature, introduces significant potential for human error. Mistakes such as (1) disconnecting the wrong loop, (2) premature disconnects, (3) cross-connecting the loop to the wrong CFA, (4) inadvertently breaking cross-connection wires on the frame for end-users not involved in the hot cut while connecting the new or disconnecting the old jumper pairs, or (5) making poor connections on the terminal block (*e.g.*, loose wire wraps) all can lead to customer service outages that can be lengthy if the problem goes undetected by the person who made the error. The hot cut process is inherently labor-intensive, inefficient, prone to error, and incapable of sustaining the volumes necessary to allow effective competition in the mass market.

Q. WHY DO YOU SAY THE HOT CUT PROCESS IS INHERENTLY INCAPABLE OF SUSTAINING VOLUMES NECESSARY TO ALLOW EFFECTIVE COMPETITION FOR MASS MARKET CUSTOMERS?

A. The failure and service restoration problems that occur at low volumes will only be exacerbated by the tremendous increase in the level of activity that will be required if unbundled local switching were not available and CLECs are forced to use UNE-L to serve mass market customers. These problems will be further compounded with the number of

additional inexperienced people that will be necessary to work the hot cut process and to troubleshoot and repair the increased troubles that are likely to occur. Because the industry as a whole has absolutely no experience providing service to mass market customers using a hot cut process -- or anything remotely comparable to it -- it is impossible to accurately qualify the impact this process will have on service quality. We do know, however, that service quality is likely to decline, because any time a process requires human intervention and manual steps, there is greater opportunity for failures to occur. Moreover, the opportunity for failures increases disproportionately when rapid increases in volumes occur. For decades, all industries, including the telecommunications industry, have affirmatively sought out and implemented technological improvements that reduce or eliminate manual activity in their transaction processes. Attempting to serve the mass market using the manual hot cut process on each and every customer's analog loop runs counter to that trend and can only turn back the clock on the technological advancements that have been made.

Q. HAS AT&T ASKED BELLSOUTH TO DEVELOP A BULK HOT CUT PROCESS?

A. Yes. AT&T has twice requested BellSouth to develop a bulk conversion processes with BellSouth. These requests were made because AT&T had found the individual hot cut process to be inadequate. Therefore, these requests were intended to provide AT&T a more efficient and effective means to migrate customers to its facilities, when it was otherwise feasible to do so.[3] In particular, it was intended to provide AT&T an additional *optional* tool for use at its discretion when the determination was made that a limited migration from UNE-P to UNE-L in unique circumstances for certain sets of customers was economically

[3] It was also anticipated by AT&T that these new BellSouth "bulk" methods would cost less than a "one at a time" process. (See Exhibit MDV-3 August 30, 2002 letter from Denise Berger of AT&T to Jim Schenk of BellSouth)

feasible.[4] AT&T did not contemplate, nor is it feasible that the processes it requested, even if implemented properly, would be capable of being used as a replacement for UNE-P.

Q. WAS A BULK HOT CUT PROCESS AS REQUESTED BY AT&T TIMELY IMPLEMENTED?

A. No. AT&T made its first request, via the BellSouth change control process, in November 2000. In March 2003 -- nearly 28 months later, BellSouth implemented a bulk ordering (not provisioning), process as a result of AT&T's change request.[5] However, that process did not meet AT&T's needs as described in the change request. In fact, the provisioning (or actual hot cut portion) of BellSouth's "new" process appears to be "business as usual," with the critical exception that it does not allow time-specific cuts, which are essential to customer satisfaction. The process implemented was simply the bulk ordering process mentioned earlier.

Q. WHAT SPECIFIC CONCERNS DID AT&T HAVE WITH BELLSOUTH'S BULK PROCESS OFFERING?

A. The process had numerous flaws that made it at least as inefficient and expensive as the old process, if not more so. Among other things, (1) the process did not allow for after-business-hours hot cuts, (2) did not provide any assurances that all end users' lines or services would in fact be provisioned at the same time or even on the same day, (3) failed to guarantee any number of total lines that BellSouth would provision in a single day, and (4) lacked a process for timely restoration of customer service in the event of a problem. Moreover, there were no cost-savings from the process.

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[4] Such conditions include a high concentration of customers, facilities are "on network" using CLEC owned fiber, and spare DLC equipment is in place and effectively represents a sunk cost to AT&T.

Q. PLEASE DESCRIBE YOUR SECOND REQUEST OF BELLSOUTH TO IMPLEMENT A BULK PROCESS.

A. In August 2002, AT&T requested, on a business-to-business basis, that BellSouth adopt a new process to address the insufficiency in the individual loop hot cut process. AT&T requested that the process include among other things:

- The ability to convert between 100 – 250 lines within a single Local Serving Office (LSO) in a single batch;
- That BellSouth complete its conversion readiness, including dial-tone/Automatic Number Identification ("ANI") testing, loop qualification testing and pre-wiring, in advance of the conversion;
- That BellSouth commit to immediate service restoration if a service outage occurred during the conversion process;
- The development of appropriate measurements and tracking to ensure the quality of the process, and if necessary, to further improve the process; and
- Substantially reduced prices for hot cuts.

Q. WHAT WAS BELLSOUTH'S RESPONSE TO THIS REQUEST?

A. BellSouth refused to commit to any volume of lines that could be included in a batch. BellSouth responded that AT&T's request was technically feasible except "the quantity of physical facilities and telephone numbers cut per evening will vary based on the load at the time the request is submitted, and will be driven by the actual lines per customer." It also indicated it would charge AT&T $134.32 per working telephone number, *in addition* to regular ordering and provisioning charges, as well as other unspecified overtime charges for technicians and service representatives.[6] In other words, the costs for the requested process were much higher and completely unpredictable. AT&T, of course, was unable to accept

[5] See Exhibit MDV-4, which attaches BellSouth's UNE-P to UNE-L Bulk Migration CLEC Information Package

[6] See Exhibit MDV-5 for June 9, 2003 letter from Denise Berger of AT&T to Phillip Cook of BellSouth.

such a cost prohibitive proposal since the purpose of the request was to move customers' analog loops from UNE-P to AT&T facilities when it was economic to do so.

Q. IF BELLSOUTH WERE TO IMPLEMENT NOW THE PROCESS AT&T REQUESTED, WOULD SUCH IMPLEMENTATION SATISFY THE FCC'S DIRECTION TO APPROVE AND IMPLEMENT A BATCH HOT CUT PROCESS?

A. No. AT&T requested this bulk hot cut process for use in limited circumstances and for relatively small volumes of customer lines. That process would not be adequate for the increased number of loop migrations that would be necessary in a world in which unbundled local switching is not available to CLECs. The FCC has directed state commissions "to approve and implement . . . a seamless, low-cost process for transferring large volumes of mass-market customers . . .." TRO ¶ 423. The process that AT&T proposed to BellSouth on a business-to-business basis would not comply with the FCC's directive.

II. THE FCC'S DIRECTION TO ESTABLISH A BATCH HOT-CUT PROCESS: WHAT ARE THE CHALLENGES?

Q. WHAT DEFICIENCIES DID THE FCC FIND WITH THE CURRENT HOT CUT PROCESS?

A. The FCC made numerous findings regarding the inadequacy of the ILECs' current hot cut process. These findings confirm the concerns AT&T has raised about hot cuts in the past and demonstrate why AT&T moved away from provisioning mass market customers' analog loops using hot cuts to provide service to its customers.

First, the FCC recognized that deficiencies in the hot cut process are seen and felt by the CLECs' customers. It found that the problems and delays associated with hot cuts "prevent[ ] the competitive LEC from providing service in a way that mass market customers

have come to expect." TRO ¶ 466. This is a substantial problem because "competition is meant to benefit consumers, and not create obstacles for them." *Id.* ¶ 467.

Second, the FCC recognized that CLECs are likely to lose customers as a result of these deficiencies. "Service disruptions also will influence customer perceptions of competitive LECs' ability to provide quality service, and thus affect competitive LECs' ability to attract customers." *Id.* ¶ 466. Specifically, the FCC found that the "record shows that customers experiencing service disruptions generally blame their provider, even if the problem is caused by the incumbent." *Id.* ¶ 467 (citations omitted).

Third, the FCC recognized that many of the deficiencies with provisioning analog loops using hot cuts are inherent in the process. The FCC concluded, based on the evidence presented, that "hot cut capacity is limited by several factors, such as the labor intensiveness of the process, including substantial incumbent LEC and competitive resources devoted to coordination of the process, the need for highly trained workers to perform the hot cuts, and the practical limitations on how many hot cuts the incumbent LECs can perform without interference or disruption." *Id.* ¶ 465 (citations omitted).

Fourth, the FCC focused specifically on the unavoidable limitations on the volume of hot cuts the ILECs could perform. The FCC found that CLECs were impaired because hot cuts could not be performed in the volumes that would occur in the mass market: "[h]aving reviewed the record evidence, we find that it is unlikely that incumbent LECs will be able to provision hot cuts in sufficient volumes absent unbundled local circuit switching in all markets." *Id.* ¶ 468. The FCC specifically rejected ILEC arguments that the FCC's prior findings in section 271 proceedings regarding hot cuts demonstrated lack of operational impairment. The FCC correctly found that the number of hot cuts in the current market environment "is not comparable to the number that incumbent LECs would need to perform

if unbundled switching were not available for all customer locations served with voice-grade loops." *Id.* ¶ 469 (citations omitted). Thus, the issue here is that there is "an *inherent limitation* in the number of manual cut overs that can be performed, which poses a barrier to entry that is likely to make entry into a market uneconomic." *Id.* (emphasis added) (citations omitted).

Finally, the FCC concluded that ILEC *promises* regarding their ability to perform any requested volume of hot cuts cannot be relied upon to demonstrate adequate performance. Specifically, the FCC found that "incumbent LECs' promises of future hot cut performance [are] insufficient to support a Commission finding that the hot cut process does not impair" CLECs. *Id.* at n. 1437.

In sum, the FCC found "ample testimony in the record" on CLECs' operational and economic difficulties with hot cuts. *Id.* ¶ 466. It recognized that "hot cuts frequently lead to provisioning delays and service outages and are often priced at rates that prohibit facilities-based competition for the mass market." *Id.* ¶ 465.

Q. PLEASE SUMMARIZE THE FCC'S ANALYSIS OF THE CONCERNS WITH HOT CUTS.

A. Consistent with AT&T's own experience, the FCC drew the following conclusions with regard to the operational deficiencies involved in the hot cut process, especially as they would apply in a market in which competitors do not have access to UNE-P:

- Hot cuts are labor intensive
- Hot cuts require the expenditure of substantial ILEC and CLEC resources
- There is a practical limitation on how many manual hot cuts an ILEC can perform
- Hot cuts often result in provisioning delays
- Hot cuts can cause significant service outages

- Poor hot cut performance causes customer dissatisfaction with individual competitors and the competitive process in general
- Hot cuts generally impose prohibitively high costs on competitors, both internal and external
- ILEC claims that current hot cut performance can be readily expanded to a "UNE-L only" environment cannot be accepted without proof of performance.

Based in part on these conclusions relating to hot cuts, the FCC made a "national finding that competitive carriers providing service to mass market customers are impaired without unbundled access to local circuit switching." *Id.* ¶ 422. In attempting to set out a plan to help mitigate the inherent deficiencies with the ILECs' current hot cut processes, the FCC asked state commissions to "approve and implement a batch cut migration process – a *seamless, low-cost process for transferring large volumes of mass market customers . . . .*" *Id.* ¶¶ 422-423. (emphasis added). This batch cut process must "render the hot cut process more efficient and reduce per-line hot cut costs." *Id.* ¶ 460. It must also "address the costs and timeliness of the hot cut process." *Id.* ¶ 488.

Q. WHAT DOES THE FCC MEAN BY "BATCH CUT PROCESS"?

A. The FCC defined a batch cut process as a seamless, low-cost process for transferring large volumes of mass market customers. *Id.* ¶ 487. The FCC found that "the hot cut process could be improved if cut-overs were done on a bulk basis, such that the timing and volume of the cut over is better managed," and the non-recurring costs reduced. *Id.* ¶ 474 (citations omitted). Indeed, the FCC found that "such improvements are likely to be *essential* to overcome the operational impairment that competitors face in serving mass market customers. *Without such improvement*, the record shows that *carriers are likely to be unable to economically serve a market characterized by low margins*." *Id.* (emphasis added).

Q. DID THE FCC FIND CURRENT ILEC PROCESSES FOR CONVERTING CUSTOMERS IN BULK TO BE SUFFICIENT?

A. No. The FCC found that:

> Project managed cut-overs involve the conversion of a number of lines at one time, pursuant to provisioning requirements and intervals negotiated by the incumbent and the competitive LEC. We find that these approaches are not sufficiently developed or widespread enough to adequately address the impairment created by the loop cut over process. The evidence in the record demonstrates that the carriers that have used project-managed cut overs have used them only for business customers, and only after acquiring the customer through a means that offered the use of incumbent LEC loops and switches in combination.

Id. ¶ 474 (citations omitted). The FCC also noted that "the record evidence indicates that incumbent LECs are not well-equipped to handle hot cut volumes even with the existence of a procedure to manage bulk migrations on a project-managed basis." *Id.* ¶ 487 at n. 1516.

Q. WHAT DIRECTION DID THE FCC PROVIDE TO STATE COMMISSIONS REGARDING BATCH CUT PROCESSES?

A. The FCC found that a "seamless, low-cost batch cut process for moving mass market customers from one carrier to another is necessary, ***at a minimum***, for carriers to compete effectively in the mass market." *Id.* ¶ 487. (citations omitted) (emphasis added) The FCC's Order directs state commissions to approve, within nine months of the effective date of the Order, a batch hot cut migration process to be implemented by the incumbent LECs that will address the costs and timeliness of the hot cut process.[7] *Id.* ¶ 488. More specifically, it requires state commissions to do the following:

[7] A state commission may decline to institute a batch cut process, provided that it instead issues *detailed* findings regarding the volume of UNE-L migrations that could be expected if competitive LECs were no longer entitled to unbundled local circuit switching, that the incumbent can be expected to meet that demand in a timely and efficient manner using the existing hot cut process, and that the non-recurring costs associated with the hot cut process are not an entry barrier *Id.* ¶ 490. Failure to develop a process, however, does not relieve the state commission of its obligation to analyze whether requesting carriers are impaired without access to unbundled switching.

- Adopt a batch cutover "increment" for migrating customers served by unbundled loops combined with unbundled local circuit switching to unbundled stand-alone loops. In other words, states should decide the appropriate volume of loops that should be included in the "batch."
- In conjunction with incumbent LECs and competitive LECs, approve specific processes to be employed when performing a batch cut. The FCC "expect[s] these processes to result in efficiencies associated with performing tasks once for multiple lines that would otherwise have been performed on a line-by-line basis."
- Determine whether the ILEC is capable of migrating batch cutovers in a timely manner.
- Adopt TELRIC rates for the batch cut process. These rates should reflect the efficiencies associated with batch migration of loops to a competitive LEC's switch, either through a reduced per-line rate or through volume discounts.

TRO ¶ 489.

Q. DOES BELLSOUTH CURRENTLY HAVE A BATCH HOT CUT PROCESS THAT MEETS THESE REQUIREMENTS?

A. No, based on BellSouth's filings in other states. However, as its batch offerings have changed in other states, I will reserve further comment for my rebuttal testimony.

Q. DO YOU BELIEVE THAT A BATCH PROCESS HAS REASONABLE PROSPECTS FOR ALLEVIATING THE OPERATIONAL AND ECONOMIC PROBLEMS THE FCC FOUND IN THE INDIVIDUAL HOT CUT PROCESS?

A. No. While AT&T has sought the implementation of bulk hot cut processes to improve the existing manual process, the improvements that AT&T sought were intended to augment *existing* manual provisioning processes. Project-managed, after hours, bulk transfers of customers on a central office and CLEC specific basis could improve the quality and efficiency of the hot cut process, and allow AT&T and other CLECs to make use of their facilities in the limited cases where such migrations are otherwise feasible. It was never contemplated that such a process, if implemented, would be adequate to support the migration volumes of customer's analog loops sufficient to serve the entire mass market. However, BellSouth's proposed bulk ordering process, as well as AT&T's proposed hot cut

process, are almost entirely manual by design. Indeed, although the process is called "batch" or "bulk", each physical loop cutover is done individually, just as they are for "individual" hot cuts. Even the best manual processes that could be operationalized today, including any batch migration process, cannot sustain competitively unconstrained migrations of hundreds of thousands of mass market customers among all carriers.

Q. WHAT OPERATIONAL CONSTRAINTS AFFECTING THE SUCCESS OF BATCH HOTS SHOULD THIS COMMISSION REVIEW?

A. First, this Commission should review the capacity constraints of any proposed batch cut process. Capacity limitations are imposed by the physical structure of the network and the manual nature of the process. Second, the Commission should conduct a review to ensure that all types of service configurations are accommodated in any proposed batch provisioning process. For example, batch provisioning processes should address the following significant market components: customers served by Integrated Digital Loop Carrier ("IDLC") loops, customers in a line splitting arrangement, and customers migrating between CLECs. Unless these service configurations are included, CLECs have no choice but to use the current inadequate individual hot cut process for these thousands of customers, and leave them out of the "improved" process that the FCC requires.

A. <u>Any Batch Process Must Address Capacity Constraints</u>

Q. WHY IS THE CAPACITY OF THE ILEC'S HOT CUT PROCESS IMPORTANT TO THIS PROCEEDING?

A. An ILEC's ability to provision mass market customers' analog loops easily and quickly between carriers at the volume or "scale" required for competition in the mass market is central to the issue of operational impairment. Clearly, if an ILEC's hot cut

process creates a bottleneck or otherwise constrains the number of analog loops that can be provisioned, CLECs are operationally impaired in serving mass market customers. There is no question that current hot cut processes are predominantly manual. As such, they impose limits on the number of customer's analog loops that can be provisioned in any given day and the number of customers a CLEC can actually migrate to its services.

This manual process stands in glaring contrast to an ILEC's ability to transfer new mass market long distance customers to its services at very low cost, in very high volumes, and in a short period of time using the highly automated PIC change process that the industry has developed over the past 20 years. There are no practical limits on an ILEC's ability to provision new long distance customers through the time-tested electronic PIC migration process. If an ILEC cannot develop a hot cut process that meets the needs of the competitive mass market for local services commensurate with the scale achieved in the long distance market, then CLECs are operationally impaired, as they are relegated to manual processes which limit their ability to acquire local customers, while the ILEC enjoys virtually unconstrained ability to provision both its local and long distance service electronically.

The TRO recognizes that, in making operational and impairment decisions, state commissions must look to all factors affecting likely revenues and costs. *See* TRO at n. 1497. An ILEC will have limited costs and complete lack of operational constraints when it utilizes the PIC process for acquiring long distance customers for its bundled local and long distance service offering. That same kind of efficient, seamless, high-volume, low cost process for CLECs attempting to acquire local customers for the CLEC's bundled local and long distance service offering is necessary to ensure a level competitive playing field. If local competition for mass market customers is to be maintained and encouraged, the process

for switching local carriers must be as seamless and unobtrusive to the end-user as the PIC change process.

Q. DID THE FCC ADDRESS THIS CAPACITY ISSUE?

A. Yes. The FCC's Triennial Review Order expressed a number of significant concerns regarding the capacity limitations of the hot cut process. First, the FCC found that hot cut capacity "is limited by several factors, such as the labor intensiveness of the process, including substantial incumbent LEC and competitive resources devoted to coordination of the process . . . and the ***practical limitations on how many hot cuts the incumbent LECs can perform without interference or disruption***." *Id.* ¶ 465 (emphasis added) (citations omitted). Second, the FCC stated that "[i]n deciding whether competitors are impaired by incumbent LEC provisioning processes, we must necessarily make a predictive judgment concerning this systemic capability to handle anticipated future hot cut volumes, which (absent access to unbundled local circuit switching) would be greater than volumes that have been experienced in the past . . . . Having reviewed the record evidence, ***we find that it is unlikely that incumbent LECs will be able to provision hot cuts in sufficient volumes absent unbundled local circuit switching in all markets***." ¶ 468 (emphasis added). Third, the FCC found that "the issue is not how well the process works currently with limited hot cut volumes, rather the issue identified by the record is ***an inherent limitation in the number of manual cut overs that can be performed***, which poses a barrier to entry that is likely to make entry into a market uneconomic." *Id.* ¶ 469 (emphasis added) (citations omitted).

Q. DOES BELLSOUTH'S CURRENT HOT CUT PROCESS HAVE SUFFICIENT CAPACITY TO SUPPORT MASS MARKET VOLUMES?

A. No. First, there is a physical limit to the number of hot cuts that can be performed per technician per day. For example, in its state 271 proceedings and the FCC Triennial Review proceedings, BellSouth provided a pictorial depiction of the central office activities required to implement a hot cut including, pre- and post-cut testing, wiring, coordination, and cut-over of the circuit (*See* Exhibit MDV-6). This straight-forward example uses a single sided distribution frame, with the work at a floor level. Much more complex frame configurations are more likely to be encountered, including configurations involving intermediate as well as main distribution frames, frames located on different floors, frames with more tiers, frames that require multiple cross connections, as well as differing technologies such as solder, punch down, and /or wire wrap terminals.

As is clear from BellSouth's own representation, the hot cut process involves numerous steps, is highly manual and takes place in an environment that lends itself to (1) disconnecting the wrong loop, (2) cross connecting the loop to the wrong CFA, (3) inadvertently breaking cross-connection wires on the frame for end-users not involved in the hot cut while running in the new or disconnecting the old jumper pairs, and (4) making poor connections on the terminal block. All these errors will lead to a customer service outage which can be lengthy should the problem go undetected by the person who made the error.

Further, BellSouth's testimony in Florida indicates that each technician can complete an average ten hot cuts per shift. Moreover, there is a limit to how many technicians can work simultaneously at a distribution frame. Again, BellSouth's own data amply demonstrate this point. For example, central office "HLWDFLWH" had 14,506 lines and BellSouth estimated that it would take 6.98 months to convert the lines in that one central office.[8] BellSouth further stated in its response to Interrogatory 44 that in making this

[8] See Exhibit MDV-7 for excerpts from December 24, 2002 Ex Parte of BellSouth filed in FCC WC Docket 01-338

estimate, it assumed (because this was a large office) 6 frame technicians dedicated to this task during the day and 12 at night, for an average of 9. It also stated that it assumed each technician would conduct approximately 11.5 cuts per day for approximately 104 conversions per day. Therefore, even in this "large office" with well over 100,000 lines, BellSouth would only convert 104 lines per day, even with working two shifts of up to twelve technicians. Maximum migrations of volumes such as these, which comprise a tiny fraction of the available customers, are a completely inadequate number to support meaningful UNE-based competition.

Finally, it is important to keep in mind that the BellSouth personnel responsible for the hot cut frame work are not dedicated exclusively to this task. Consideration must be made of the personnel and space availability requirements for *other simultaneous* central office activities such as new service installations for both BellSouth and CLECs, migrations back to BellSouth, troubleshooting and repairing frame related troubles on existing lines. For example, when BellSouth technicians install new wires on the Main Distribution Frame "MDF" for an existing customer migration, the technicians will also have to perform a separate job (or jobs) to disconnect and remove (or "mine") the existing wires from the MDF.

Q. WHAT CAPACITY TO MANUALLY PROVISION LOOPS FOR THE MASS MARKET SHOULD BE REQUIRED?

A. The appropriate model for an analysis of required capacity is the activity in the long distance market, which is actively competitive, and therefore representative of the level of competition sought by regulators and the CLEC industry. There, the average "churn rate" – the percentage of all customers making a carrier change – is approximately 25% of all lines

in a year.[9] In BellSouth Tennessee territory, that level of churn would mean if customers were moved from one carrier to another using UNE-loops exclusively, the churn would be approximately 49,000 lines per month. [Based on BellSouth's October MSS Customer Trouble Report Rate report that states it has approximately 2,343,000,200 POTS lines in service in Tennessee (approximately 2,069,000 retail POTS, 20,000 resale, 219,000 UNE-P, and 35,000 analog UNE-L)]. This equates to over 2,200 hot cuts per business day. In such a market, BellSouth would have to perform more hot cuts in a day--every business day--than it performs in months in the current environment.

The ***minimum*** standard against which BellSouth's capacity should be assessed is the amount of hot cuts BellSouth would need to perform in a market in which competition currently relies on both UNE-P availability and UNE-L availability but, if unbundled local switching is not available, would rely on only UNE-L availability. In other words, the Commission should compare loop volumes to UNE-P volumes to see if BellSouth is indeed capable of performing the former type of customer transfer at the same level as the latter. Elimination of UNE-P should never be allowed to materially restrict competitive choices that consumers have today. According to BellSouth's response to AT&T interrogatory 32 (See Exhibit MDV-8), it has issued an average of 12,722 service orders per month to migrate customers to UNE-P in Tennessee during a recent 14-month period.[10] During that same period, BellSouth issued an average of 34 migrations to UNE-L orders per month. (See Exhibit MDV-9). Thus, BellSouth has processed on average ***374 times more*** UNE-P

[9]From the Yankee Group's 2003 TAF (Technologically Advanced Family) survey- a national household survey mailed to several thousand US households during the second quarter of the year. The study sample is selected from a Consumer Mail Panel of 600,000 representative households, which is updated annually

[10] While the number of orders issued is not exactly equal to number of orders completed, it is a reasonable surrogate for purpose of this analysis.

migration orders each month than it has UNE-L migration orders.[11] In short, converting from using UNE-L for specialty market situations into UNE-L for the mass market requires scaling by a factor of 374 to 1.[12]

Q. ARE THERE OTHER PHYSICAL STRUCTURE ISSUES THAT LIMIT THE CAPACITY OF BELLSOUTH'S HOT CUT PROCESS IN TENNESSEE?

A. Yes. The rate at which BellSouth can conduct hot cuts is also adversely affected by the extra dispatches of technicians required by: (1) unmanned central offices, and (2) hot cuts involving IDLC loops, which will require a field dispatch. For example, 48% of BellSouth's central offices are unmanned. (*See* BellSouth response to AT&T Interrogatory No. 1 attached as Exhibit MDV-10).

Further, 26% of BellSouth's lines in Tennessee are served using Integrated Digital Loop Carrier ("IDLC").[13] Loops on IDLC do not have an appearance on BellSouth's MDF and thus cannot be transferred (if at all), without additional work.

At a minimum, a technician would have to be dispatched to transition the service to Universal Digital Loop Carrier ("UDLC") or copper facilities, if they are available. Based on the IDLC percentage provided by BellSouth of 26%, BellSouth would have to dispatch field technicians approximately 57,000 times just to convert the existing embedded base of UNE-P.[14] Dispatches such as these add complexity to the cut and could well lengthen the cut interval.

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[11] These numbers do not include migrations back to the ILEC, which also require provisioning work. In assessing BellSouth's capacity to do the work required, those volumes must be added. .

[12] Both these models are conservative in that they do not include the additional work that would be created if any markets are found not be to impaired and thus the embedded base of UNE-P must be migrated.

[13] See Exhibit MDV-12 BellSouth response to AT&T Interrogatory No. 25.

[14] According to BellSouth's October 2003 MSS Customer Trouble Report Rate report, BellSouth had approximately 219,000 UNE-P lines in service. 26% of 219,000 is 56,940.

BellSouth recognizes these issues. In its response to AT&T's POD 14 in Florida (See Exhibit MDV-11), BellSouth stated "[a]dditional time to provide loops where existing service is provided over IDLC is necessary due to the fact that the process for handling a hot cut conversion is *significantly different* than with non-IDLC." Certainly the travel time and extra personnel required add to the cost and reduce the efficiency of the overall process. None of these problems affect customers served by UNE-P.

Q. ARE THERE OTHER CONSTRAINTS ON THE CAPACITY TO PERFORM HOT CUTS CAUSED BY THE MANUAL NATURE OF THIS PROCESS?

A. Yes. Electronic order flow-through is an important component of capacity, as each instance of manual (human) intervention decreases efficiency and lengthens the provisioning interval. For example, when a service request flows through the ordering OSS without manual intervention, BellSouth is required to return a rejection in one hour or a FOC in 3 hours. However, if it falls out for manual handling, that interval becomes 10 (business) hours, which in many cases means that BellSouth can delay the order for a full day if it does not flow through. (BellSouth provides no performance data on the frequency and duration of fall-out from its provisioning systems.) Further, the percent of orders migrating service to UNE-L which were manually handled by BellSouth were significant: June 2003 – 91.41%, July 2003 – 74.2%, and August 2003 – 71.0%. (See Exhibits MDV-8). With approximately three fourths of the UNE-L migration orders requiring manual intervention, it is obvious that productivity will be impacted if the volumes of orders were increased many-fold.

Q. ARE THERE OTHER ISSUES RELATED TO BATCH CUTS THAT THIS COMMISSION WAS DIRECTED TO CONSIDER?

A. Yes. The FCC also directed state commissions to consider whether (or the extent to which) temporary or "rolling access" to UNE-P would address all identified impairment. TRO ¶ 524. Rolling access to UNE-P is clearly not adequate to "cure" the many operational and economic issues for the reasons described in this and other AT&T testimony. For example, rolling access would not alleviate service outages caused by hot cuts; it would not resolve the economic impairment that results from the collocation, digitization, concentration and backhaul costs that a CLEC must incur to connect the ILEC loop to its switch; it would not correct the inefficiencies and errors created by the manual hot cut provisioning; and it would not overcome the capacity constraints which are created by the volumes of hot cuts required and exacerbated by scenarios such as IDLC, line splitting and CLEC-to-CLEC migrations. Notwithstanding its inability to cure impairment, however, access to UNE-P to be used in conjunction with the batch process is critical for the CLEC to acquire the customer before moving it to a UNE-L/CLEC switch network configuration. Indeed, AT&T is not aware of any methodology for transferring "batches" of customers that would not require the customers to first be acquired by the CLEC.[15] Further, as acknowledged by the FCC, "competitive LECs may face difficulties in accumulating enough customers to justify batch line migration processing *in both new central offices* and existing collocations." *Id.* ¶ 522 (emphasis added). Any such process must also include sufficient time for CLECs to accumulate enough customers to justify collocation, and enough time to then establish the collocation in new central offices. That said, even with these minimal requirements, such a process still would not address the operational and economic problems identified.

[15] The FCC stated that "we find that the availability of unbundled local switching -- even on a temporary basis -- may enable competitors to acquire customers, aggregate them, and migrate them to the carriers own switch in a manner *that would not be feasible if the customers each had to be migrated individually* upon signing up with the competitive LEC. TRO ¶ 522 (emphasis added)."

III. AT&T'S RECOMMENDATIONS

Q. DID THE FCC IDENTIFY A STANDARD AGAINST WHICH AN ILEC'S HOT CUT PROCESS SHOULD BE MEASURED?

A. Yes. In describing a hot cut process that demonstrated "consistently reliable performance," the FCC recognized that for the migration of customers, UNE-P should be the standard of performance. It stated: "This review is necessary to ensure that customer loops can be transferred from the incumbent LEC main distribution frame to a competitive LEC collocation *as promptly and efficiently as incumbent LECs can transfer customers using unbundled local circuit switching*." TRO at n. 1574 (emphasis added). Thus, the appropriate comparison must be whether the ILEC can move customers served by UNE-L at the same volumes and performance levels as UNE-P. This is perfectly logical, since CLECs would be forced to abandon UNE-P and substitute UNE-L if they are denied access to unbundled local switching.

Moreover, such a standard is required in order to provide parity to all carriers that seek to provide a bundle of both local and long distance services to mass market customers. ILECs today can (and do) add large numbers of long distance customers through the electronic PIC process, which is very comparable to the electronic OSS used to provide UNE-P service. If CLECs cannot have the same ability to add local customers, they are seriously impaired in their ability to provide similar bundled offers. Indeed, the RBOCs themselves have recognized that the ability to offer such bundles is a major competitive advantage in fending off CLECs and/or winning back CLEC local customers. Further, since the FCC's impairment standard requires a review of all costs and revenues a CLEC would incur, including long distance, CLECs must have the same ability to offer local/long distance bundles as the ILEC.

Q. WHAT CHARACTERISTICS SHOULD BE INCLUDED IN ANY BATCH CUT PROCESS CONSIDERED BY THIS COMMISSION?

A. While any batch process will very likely continue to contain too much manual work to significantly reduce the economic and operational impairment, the development of a batch cut process by this Commission would be of some benefit to competition, because it would facilitate CLECs' use of non-ILEC facilities in the limited situations where it is otherwise feasible to do so. The process should, at a minimum, address the following:

OVERALL

- As an initial matter, because it is based primarily on manual work, the batch process should be recognized as an interim solution with limited opportunities for improvement over the current individual hot cut process. Therefore, to more effectively reduce CLEC impairment, the Commission should develop a plan with specific time frames to move to an electronic solution that requires fundamental changes to the ILECs' network architecture that currently creates operational and economic barriers to competitive entry to serve mass market customers.

- Any hot cut issue raised by any party that is not solved through the development and implementation of a batch process should be documented for further review by the Commission.

APPLICABILITY/SCOPE

- The batch process must include all mass market (residential and small business) customers, all types of loops used to serve such customers, and all types of transfers between all LECs. Thus, the process should be insensitive to the identity of the previous carrier and the technology that carrier uses to provide service. In addition, the process should not require CLECs to perform any pre-order activity to "qualify" that an unbundled loop can be migrated. In addition to existing UNE-P customers served over copper, UDLC, and NDGLC, at a minimum, the process must apply to:

    - IDLC loops
    - UNE-L based line splitting
    - CLEC to CLEC migrations

VOLUME/CAPACITY

- The batch process must support efficient migration of a sufficient quantity of bundled loops (equivalent to LD PIC changes/UNE-P volumes/churn of ILEC win-

backs/CLEC to CLEC) to support a fully competitive mass market at quality levels no less than the UNE-P alternative that would be removed.

- Size of batch
    - The batch should be sized to permit the CLEC and ILEC to achieve cost efficiencies.
    - The batch (as well as the number of batches per day) should be sized to accommodate the overall number of migrations required to achieve the scale needed to handle mass volumes.

PROCESS REQUIREMENTS

- The batch process must operate in conjunction with an existing electronic customer acquisition process (*i.e.*, UNE-P).

- To facilitate a workable transition of customers between CLECs, the customer should first be migrated to UNE-P as a bridge between the UNE-L setup of each CLEC.

- The ILEC should provide CLECs the capability to identify which UNE-P customers/lines are eligible for a batch on a mechanized and batch basis (*e.g.*, the CLEC should not be required to do one-by-one prospective queries to determine if the conditions necessary to include a specific line in a batch are or are not met). The ILEC should also establish the electronic ability to provide a specific batch of potential telephone numbers to a CLEC when the conditions for a batch have been met.

- After receiving the notification from the ILEC that the conditions for a batch cut over are met, the CLEC must have sufficient lead-time to advise its customers of the need to reprogram features such as voice mail and speed dialing, and in appropriate cases sufficient lead-time to prepare its collocation equipment, switching equipment and/or technician time so the CLEC can accept the loops to be transferred.

- The CLEC should have the ability to schedule hot cuts and batch hot cuts at any point in a twenty-four hour day with the costs insensitive to the scheduled time of the hot cut (as in an electronic system such as UNE-P).

- "Batches" should be CLEC specific, *i.e.*, each "batch" should only apply to one CLEC.

- The batch process must be developed to provide equivalent OSS functionality to UNE-P transactions, including:
    - Equivalent electronic pre-ordering and ordering capability

- Equivalent levels of flow-through for ordering and provisioning systems to increase accuracy and lower costs.
- One LSR per migrating UNE-P customer / account
- Directory Listings must remain AS-IS when converting from UNE-P to UNE-Loop

- Real-time electronic notification must be available for order status, testing status, and notification of individual loop cut completion.

- The Commission should include in its analysis the feasibility of interim automation of hot cut provisioning as part of the batch process.

CUSTOMER CARE

- There must be a self-executing process to immediately switch customers back to UNE-P if an individual cut fails, with follow-up electronic communication from the ILEC to the CLEC indicating the cause of the failure, how the ILEC will remedy the failure and when the customer can be migrated to an unbundled loop. The rolling interval for affected loops/customers should restart.

ECONOMIC

- The batch process design must result in significant cost reduction for all involved parties.

VALIDATION, TESTING AND QUALITY ASSURANCE

- ILECs must prove they have systemic capability to handle the provisioning of hot cuts at volumes anticipated across all its markets in the absence of unbundled local switching. Therefore, once designed, the batch cut process must be subject to both pre-implementation and post implementation testing. Pre-implementation testing should include third party "time and motion" study of the hot cut process, and third party-monitored ILEC testing using its own collocation and migration of significant numbers of its own customers through hot cuts from direct connection to its switch to its collocation equipment installed to operate as a pseudo-CLEC specifically for this test. Post-implementation "testing" would include on-going commission review to determine if the batch hot cut process meets the needs of commercial mass markets in a manner that permits effective and efficient competition.

- The Commission must direct the ILEC to investigate, report and eliminate any negative impacts of large scale migration from UNE-P to UNE-L from the following:

  - E-911 "unlocks"
  - Number porting
  - Availability of repair testing capabilities
  - Repair databases

- Billing system migrations, such as from Carrier Access Billing System ("CABS") to Customer Record Information System ("CRIS")
- Provisioning systems such as Trunks Integrated Records Keeping System ("TIRKS")
- Directory listing and assistance

- The Commission must direct the ILEC to investigate, report and eliminate any negative impact of large-scale migration from UNE-P to UNE-L on local network interconnection trunking and tandem performance.

- The Commission must direct the ILEC to report at a central office level the current number of working IDLC access lines and the spare parallel copper or UDLC facilities available to migrate these lines to, should the customer wish to change their local service provider. It should also provide its plans to provide an unbundled loop when spare parallel copper or UDLC facilities are not available.

- The process must include a method to insure CFA inventories between and among ILECs and CLECs are initially accurate and remain reconciled.

- Competitors must be guaranteed easy access to collocation sites, including the right to use reasonably qualified contractors (*i.e.*, ILEC should not be allowed to dictate the identity of contractors, provided they meet a reasonable skill set)

PERFORMANCE STANDARDS AND ASSURANCE

- Batch cut and other associated loop performance standards should be equivalent to performance for migrating a customer from retail to UNE-P.

- Key performance measurement factors must be in place:

  - Continue to measure at the most granular level feasible for each activity (FOC, rejection, missed appointment, cuts on time, service outage, etc.)
  - Create new measures for key activities unique to batch process, e.g. percentage of batches started on time and completed on time.
  - Eliminate current exclusions in performance measures for projects/batches
  - Create, if not currently in place, measures for % service outages during conversion, and average recovery time of outages
  - Revise/establish benchmarks to drive performance that protects end-users

- Self-executing financial consequences must be in place for ILEC failures to meet required performance standards. For all conversion service outages, these consequences should be commensurate with the average net revenue times the average life of the customer

Following are additional requirements should the Commission establish only temporary access to UNE-P:

- To mitigate customer confusion and frustration with the double migration that would occur if UNE-P were only available on a temporary basis, all of the features offered by the incumbent LEC should be made available to the CLEC at TELRIC rates. By doing so, customers would not be forced to change their programmable features such as speed dialing and voice mail multiple times during this rolling acquisition process.

- There must be exceptions to any established time limits that customers may remain in UNE-P "acquisition mode" pending placement into a batch for transition to UNE-L. These include:

    - The time needed to add new CLEC equipment (*e.g.*, DLC in collocation) or to augment CLEC facilities (e.g. transport) when the expansion or augmentation is not complete for reasons beyond its reasonable planning or control
    - The time needed to augment collocation space
    - Cases of ILEC collocation space exhaust
    - The ILEC's inability to migrate customers to UNE-L within prescribed time frames
    - ILEC failure to meet non-discriminatory service standards

Q. WHAT INFORMATION DOES THIS COMMISSION REQUIRE FROM THE ILEC TO DETERMINE IF ITS HOT CUT PROCESS IS SUFFCIENTLY SCALABLE TO SERVE THE MASS MARKET?

A. AT&T believes it is clear from available information that BellSouth's current hot cut process capability, demonstrated by its own data, is not capable of supporting mass market competition. However, in conducting any assessment of the capacity of BellSouth's hot cut process (quantity) along with adequate quality, it is essential for BellSouth to provide the following information, with appropriate and adequate supporting detail, so that the Commission can ascertain the relative capability BellSouth has to provision service to mass market customers:

1. Proof that a neutral, third-party, valid time and motion study has been conducted to determine the time it takes to perform all of the steps necessary on the frame to perform a hot cut, and that volume testing has also been conducted.
2. Determination of the ILEC's maximum daily hot cut throughput based on the output of the time and motion study and its current staffing levels.
3. The ILEC's estimate of the daily hot cut volumes it will face in a non-UNE-P environment and the supporting details on how it arrived at this estimate.

4. The ILEC's human resources strategy specifically outlining the number of additional people it will need and how it plans to recruit, hire and train these additional people.

5. Outputs from a third party-monitored ILEC testing using its own collocation and migration of significant numbers of its own customers through hot cuts from direct connection to its switch to its collocation equipment installed to operate as a pseudo-CLEC specifically for this test.

6. The ILEC's plans for converting the embedded base of UNE-P customers while continuing to perform its normal day-to-day frame work.

7. Disclosure of an inventory of its access lines on IDLC facilities and the amount of spare copper/UDLC facilities that these lines can be migrated to.

8. Disclosure of an inventory of the collocation space readily available in each central office in Tennessee and its plan for how it will support the additional requests it could be expected to receive for new collocation arrangements and augments to existing arrangements, together with the impacts that this plan will have on existing collocation intervals.

9. The ILEC's plans for how it will expand its tandem switching and associated transport network to accommodate all of the additional traffic it will be receiving from the CLEC switches.

10. The ILEC's plans for deploying new technologies to eliminate the manual efforts associated with a hot cut.

11. The metrics that the ILEC proposes that the Commission use to monitor its performance.

Moreover, the answers to these questions alone do not adequately describe what capacity or scalability means. In a fully competitive market, carrier changes occur in multiple directions: from ILEC to a CLEC, from a CLEC to an ILEC, from a CLEC to another CLEC. Mass-market scalability means that the ILEC can manage all of these types of transactions over its entire geographic footprint each day and every day. That is a substantial task that is being achieved in the long distance market using the PIC process and in the local market today using UNE-P. Further, as the TRO economic impairment test requires CLECs to use a model that includes both local and long distance revenues, failure to have comparable processes for use by ILECs and CLECs for both local and long distance will result in significant impairment to CLECs.

The ILECs should not be allowed to respond to this absolutely critical issue with vague assurances that its processes are scalable or otherwise capable of supporting mass market UNE-L competition.[16] Both central office specific and statewide analysis, documentation and testing is necessary, and the benchmark adopted must demonstrate BellSouth's ability to perform sufficient volumes to support a fully competitive market at the same performance level as UNE-P, in order to ensure robust mass market competition.

Q. IF THIS COMMISSION ORDERS, AND THE ILEC SUCCESSFULLY IMPLEMENTS, THE BATCH HOT CUT PROCESS AT&T REQUESTS, WILL THAT SUFFICIENTLY ADDRESS IMPAIRMENT ISSUES?

A. No. Although a batch process, if properly designed and performing at levels and volumes equivalent to UNE-P would address many specific operational impairment concerns, new operational issues are likely to arise as discussed above. And even if the BellSouth charges for hot cuts were reduced, that would affect only one of many additional costs that only CLECs face in attempting to provide service using non-ILEC switches.

Q. ONE OF THE ISSUES THE FCC ASKED STATE COMMISSIONS TO ADDRESS WAS THE VOLUME OF LOOPS THAT SHOULD BE INCLUDED IN A BATCH. WHAT IS THE NUMBER OF HOT CUTS BELLSOUTH SHOULD BE ABLE TO RELIABLY PERFORM IN A GIVEN TIMEFRAME?

A. As described earlier in my testimony, based on its analysis of available data, AT&T has grave concerns regarding BellSouth's capability to perform at the volumes required to support the mass market. I also described the capacity standards (equal to level of long

[16] *See TRO* n 1437 ("We find, however, incumbent LECs' promises of future hot cut performance insufficient to support a Commission finding that the hot cut process does not impair the ability of a requesting carrier to provide the service it seeks to offer without at least some sort of unbundled circuit switching. While incumbent LECs state that they have the capacity to meet any reasonable foreseeable increase in demand for stand-alone loops that might result from increased competitive LEC reliance on self-provisioned switching, there is little other evidence in the record to show that the incumbent LECs could efficiently and seamlessly perform hot cuts on a going-forward basis for competitors who submit large volumes of orders to switch residential subscribers.")

distance competition) that AT&T believes the Commission should require the ILEC to achieve. For example, if 2.1% of the Tennessee access lines change long distance carriers each month, then the ILECs' process for migrating local customers should also accommodate the same percentage churn for local loops.

Based on the volumes of hot cut orders the Commission determines that the ILEC be required to perform per day to facilitate mass market competition, it should then establish batch sizes and numbers of batches per day sufficient to permit the required volume of transactions to occur.

Q. WHAT MUST THIS COMMISSION ORDER IN TERMS OF IMPLEMENTING ITS APPROVED HOT CUT PROCESS?

A. The FCC directed state commissions to "approve *and implement*" a batch cut migration process. TRO ¶¶ 423, 460 (emphasis added). Thus, this Commission must do more than simply order BellSouth to design a process; it must test BellSouth's process until it is proven to work. Otherwise, the Commission will have failed its task of approving "a seamless, low-cost process for transferring large volumes of mass market customers." *Id.* at ¶ 423.

Q. GIVEN THAT THE IMPROVEMENTS THAT CAN BE MADE TO THE CURRENT MANUAL PROCESS ARE ALMOST CERTAINLY INADEQUATE TO OVERCOME THE ECONOMIC AND OPERATIONAL IMPAIRMENTS IDENTIFIED BY THE FCC, WHAT OTHER SOLUTIONS SHOULD THIS COMMISSION CONSIDER?

A. As discussed above, the FCC found, on a national basis, that CLECs are impaired in their ability to provide local exchange service because, among other things, of the expense, delay and service degradation caused by the current, manual hot cut process. This should logically prompt state regulators to question whether, in an age of digital processing, any

manual, labor-intensive, and error-prone system for loop migration will ever be efficient enough, both economically and technically, to support robust local exchange competition.

There is a means available that uses currently available technology and allows the provisioning of loops to be operationally and competitively neutral, making it the local service counterpart of "equal access" in the long-distance market. This is a process that AT&T has generically referred to as "electronic loop provisioning" ("ELP"). In this environment, consumers would be able to change their local carrier seamlessly, and no carrier would have inordinate advantages in competing for a mass market customer's business. This is in sharp contrast to the current, hard-wired, manual connections from customer premises to ILEC central offices. Implementation of such an electronic provisioning process would create permanent virtual circuits that could use software commands to shift loops from one carrier to another quickly and inexpensively, with no loss or degradation of service. Thus, the Commission should consider whether the use of ELP -- or some other automated process -- is necessary to place all competitors on an equal footing in their ability to provide service using mass market loops and CLEC-provided switching.

IV. CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. The process of migrating customers to a CLEC-owned switch using an ILEC loop, the so-called "hot cut process," is extremely dependent on manual work, rendering the process prohibitively expensive, highly error prone, and not scalable to handle reasonable commercial volumes. As such, CLECs will remain impaired by any manual hot cut or loop migration process. Even the best manual processes that could be operationalized today, including batch migration processes, cannot satisfy the requirements needed to eliminate the

CLECs' operational impairment in attempting to compete for mass-market customers. Accordingly, this Commission should develop and approve a comprehensive process but should test and implement that process carefully to evaluate the extent to which CLECs remain impaired. At the same time, this Commission should encourage development of a process that automates the transfer of end-user loops. Any migration process that does not automate the transfer of end-user loops, eliminating the need for manual "hot cuts," cannot sustain competitively unconstrained migrations of customers among all carriers, both CLECs and ILECs alike. In order to establish and sustain competitively unconstrained migrations of customers among all carriers, an electronic process for loop provisioning must be made available which is as easy, efficient, and reliable as the UNE-P provisioning process for local customers and the PIC change methodology in place for long distance.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2004, a copy of the foregoing document was serviced on the parties of record, via US mail:

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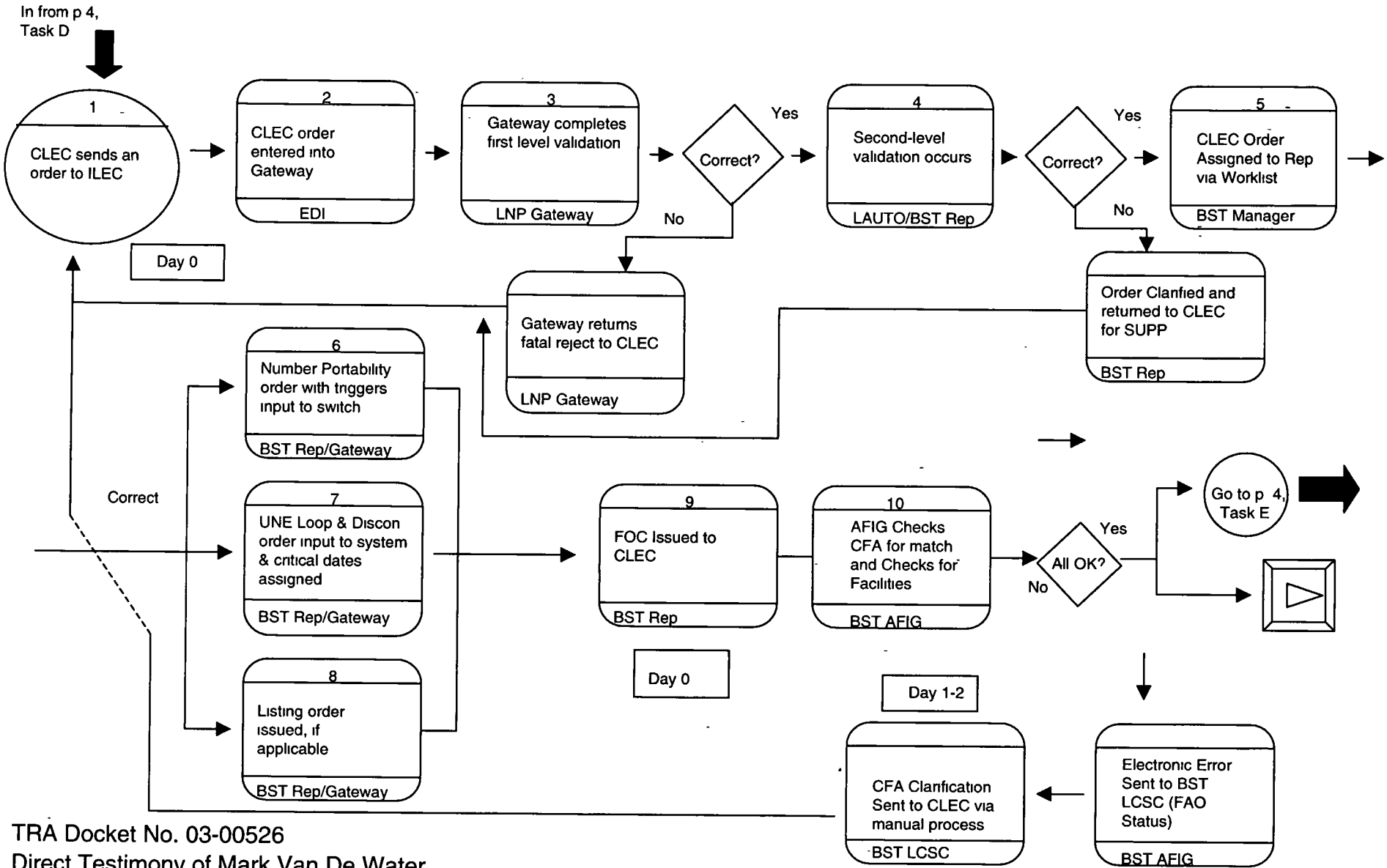
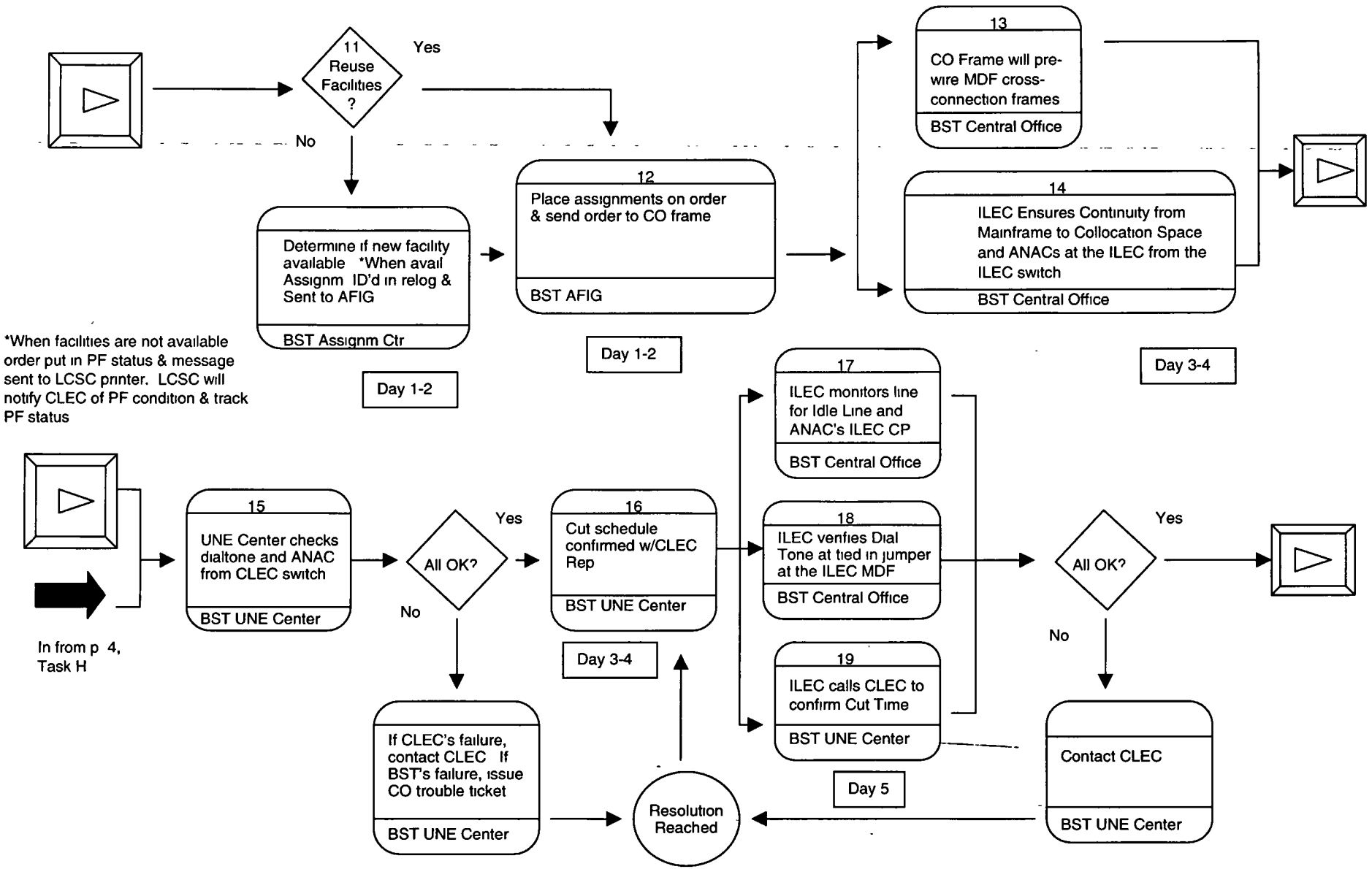
Henry Walker

Coordinated Hot Cut Process

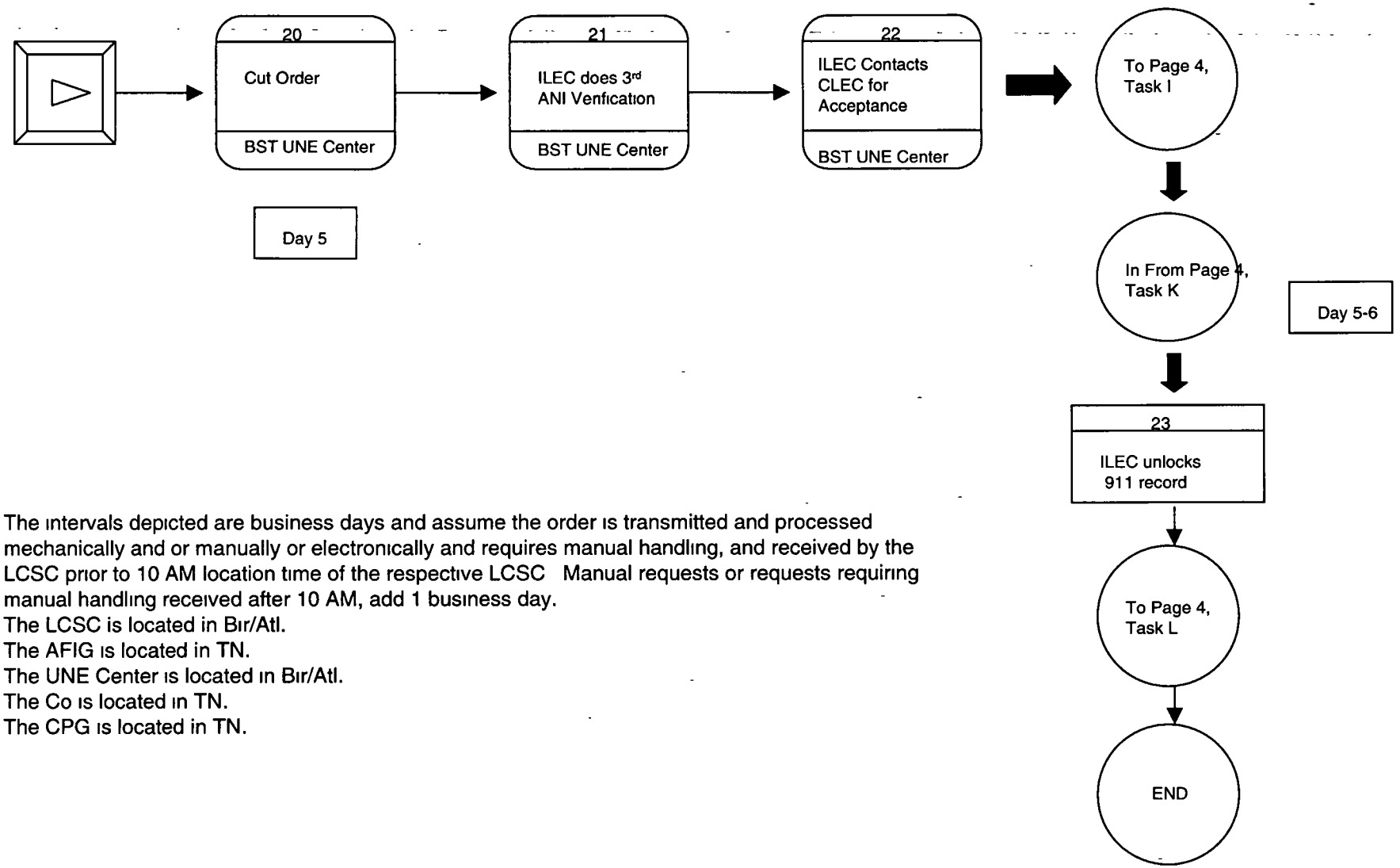


TRA Docket No. 03-00526
Direct Testimony of Mark Van De Water
Exhibit: MDV-1

Coordinated Hot Cut Process

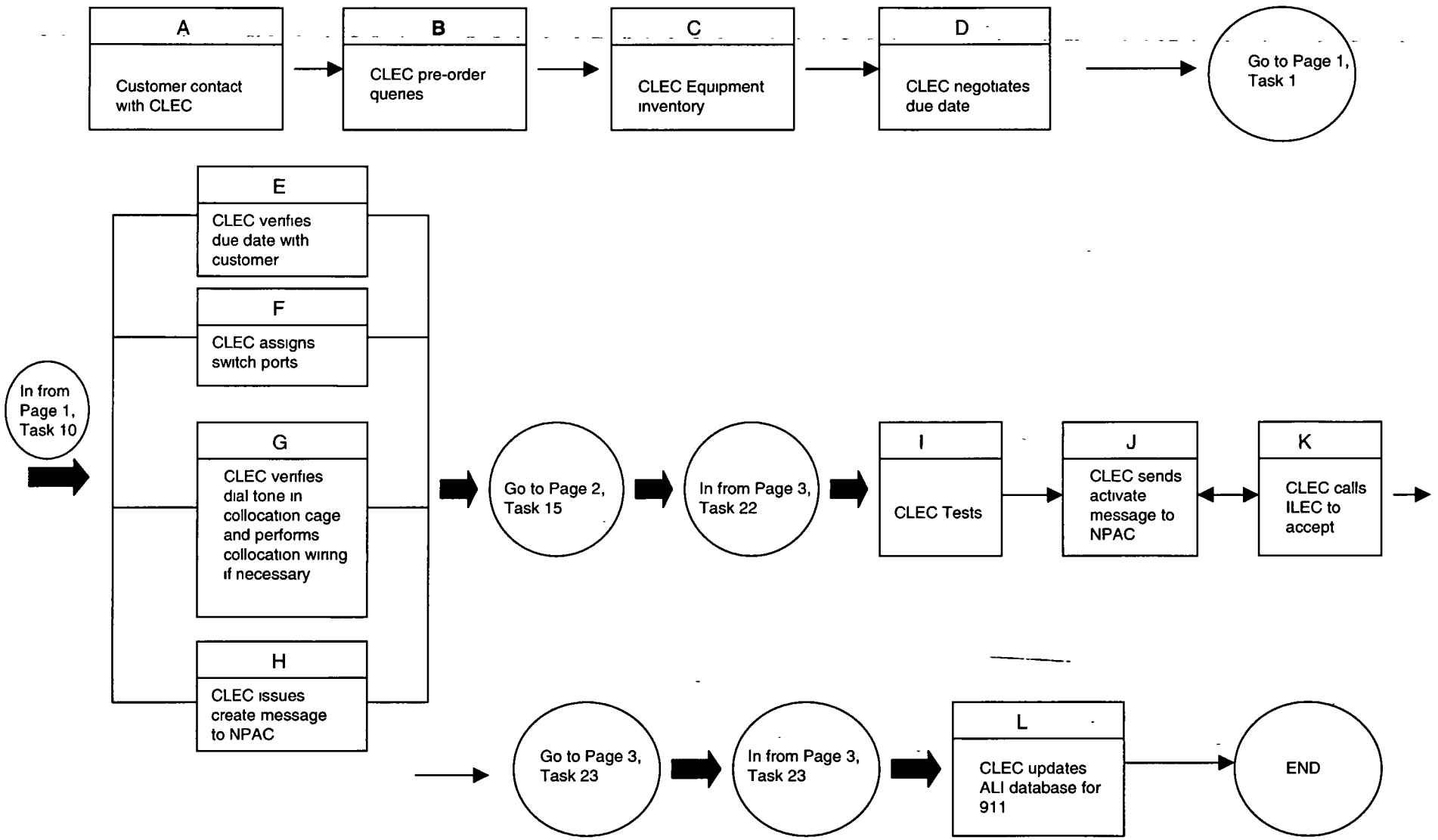


Coordinated Hot Cut Process



- The intervals depicted are business days and assume the order is transmitted and processed mechanically and or manually or electronically and requires manual handling, and received by the LCSC prior to 10 AM location time of the respective LCSC Manual requests or requests requiring manual handling received after 10 AM, add 1 business day.
- The LCSC is located in Bir/Atl.
- The AFIG is located in TN.
- The UNE Center is located in Bir/Atl.
- The Co is located in TN.
- The CPG is located in TN.

Coordinated Hot Cut Process
CLEC Hot Cut Incremental Activities



TRA Docket No. 03-00526
Direct Testimony of Mark Van De Water
Exhibit: MDV-2

VIDEO ATTACHED

August 30, 2002

VIA FACSIMILE AND MAIL

Jim Schenk
BellSouth Telecommunications, Inc.
600 North 19th Street
8th Floor
Birmingham, Alabama 35203

RE: Coordinated Bulk Hot Cut Process

Dear Jim:

The purpose of this letter is to request BellSouth's adoption of a new process in our companies' efforts to address the insufficiency in today's loop-by-loop hot cut process. As we have discussed on several occasions, in spite of its commitment to serving customers on our own local network, AT&T has found it increasingly difficult to use unbundled loops to provide service to our small business local customers. While there are many factors, the inability to complete individual hot cuts in a commercially reasonable manner has proven to be a significant initial hurdle. In fact, in spite of the development of detailed individual hot cut processes to avoid outages, our experience has shown that current methods are unreliable, uneconomical and incapable of sustaining commercial volumes in a competitive environment.

However, AT&T has achieved a small measure of success in New York where, using an outside contractor, AT&T has been able to convert thousands of customers to AT&T's network using a bulk hot cut process. We wish to implement a similar process in the BellSouth territory. This process allows for the project-based conversion of a number of AT&T customers within a single local serving office ("LSO") and takes advantage of the efficiency of converting a number of lines, after regular business hours, with real time coordination between AT&T and BellSouth. Contrary to the current individual hot cut processes, the bulk conversion process can eliminate many of today's problems with customer outages and the lack of commercial volumes, while at the same time significantly lowering the cost to both BellSouth and AT&T.

Based on the New York experience, it is clear that it would be worthwhile to develop a process which would allow AT&T to migrate those customers currently served on the

UNE platform to AT&T's own network using unbundled loops. More importantly, because a bulk conversion process will be less costly for BellSouth to implement, we would anticipate substantial reductions on UNE-L hot cut charges associated with this process. Therefore, I am now asking for your commitment to work collaboratively with AT&T to fully document and implement the necessary procedures for such bulk conversions. AT&T has identified a number of factors that must be addressed in order to ensure a successful process. Although probably not a comprehensive list, these factors include:

- The ability to convert between 100 – 250 lines within a single LSO at one time;
- The development of a streamlined ordering process to avoid unnecessary individual orders and both the work and costs associated with them;
- A project managed focus at both AT&T and the BellSouth;
- BellSouth's conversion readiness, including dial-tone/ANI testing, loop qualification testing and pre-wiring in advance of the conversion;
- Dedicated personnel at BellSouth for the duration of the conversion process, including personnel able to resolve CFA discrepancies identified during the bulk conversion;
- Commitment of immediate service restoration in the event of a service outage during the conversion process;
- The development of appropriate measurements and tracking to ensure the quality of the process, and if necessary, to further improve the process;
- Substantially reduced prices for UNE-L hot cuts to take into account reduced costs for BellSouth.

Additional requirements, which, we believe, BellSouth already delivers via COSMOS and LENS, are the electronic access to BellSouth's CFA inventory and the ability to identify spare and utilized facilities.

In order to most efficiently develop and test a bulk hot cut process, I suggest that each company designate a representative to lead our implementation teams with this effort. I will lead the AT&T team and ask that you designate the appropriate BellSouth team leader as soon as possible. Given the importance of this process to any attempt by AT&T to use unbundled loops to serve our customers, I ask that negotiations on the process begin no later than September 16, 2002.

Sincerely,

cc: Greg Terry

UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration

CLEC Information Package

Version 1

TRA Docket No. 03-00526
Direct Testimony of Mark Van De Water
Exhibit: MDV-4

UNE-P to UNE-L Bulk Migration

Table of Contents

UNE-P to UNE-L Bulk Migration

1. Introduction & Scope

This Product Information Package is intended to provide CLECs general ordering information specific to the **UNE-P** to **UNE-L** Bulk Migration process described herein.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Local Support Manager if you have any questions about the information contained herein

UNE-P to UNE-L Bulk Migration

2. Service Description

The Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration process may be used by a CLEC when migrating existing multiple non-complex UNE-P Services to a UNE-L offering.

All Bulk Migration orders will be project managed by a BellSouth Project Manager. Initially, the CLEC will submit required information to a BellSouth Project Manager who after reviewing the bulk migration work effort with the field organizations will provide due dates back to the CLEC. Once the CLEC receives the due date information from the BellSouth Project Manager, the CLEC will electronically submit a Bulk Request for service order processing and provisioning. This allows migration of multiple UNE-P end-users to a UNE-L offering without submitting individual Local Service Requests.

UNE-P and UNE-L are defined below:

2.1 UNE-P

UNE-P is a UNE Port/Loop Switched Combination that combines a UNE local switch port and UNE loop to create an end-user-to-end-user transmission path and provides local exchange service. The CLEC may also choose to use the vertical services that are available through the features and functions of the local switch.

2.2 UNE-L

UNE-L is defined as the local loop network element that is a transmission facility between the main distribution frame (MDF) in BellSouth's central office and the point of demarcation at an end-user's premises. This facility will allow for the transmission of the CLEC's telecommunications services when connected to the CLEC's switch equipment. The local loop will require cross-connects for connection to the CLEC's collocation equipment BellSouth does not provide telecommunications services with the UNE-L.

UNE-P to UNE-L Bulk Migration

3. Requirements

Major requirements for UNE-P to UNE-L Bulk Migration process are listed below. For complete requirements, refer to the **UNE to UNE Bulk Migration** section of the **Local Ordering Handbook** *(formerly named "BellSouth Business Rules for Local Ordering")*

- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services to Unbundled Loops with Local Number Portability (LNP).
- A UNE Loop will be provided for each ported telephone number formerly associated with the UNE-P Service.
- Complex UNE-P accounts are prohibited on Bulk Requests. Examples of Complex UNE-P are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P Centrex, Digital Direct Integration Termination Service (DDITS), etc.
- The UNE-Ps that can be migrated are listed in the **UNE-P USOC** section.
- UNE-Ps can be migrated to the UNE-Ls listed in the **UNE-L USOC** section. These UNE-L types must be in the CLEC's Interconnection Agreement.
- Bulk Requests that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status, must be cancelled by the CLEC and removed from the Bulk Request.
- All Existing Account Telephone Numbers (EATNs) on the Bulk Request must use the existing Regional Street Address Guide (RSAG) valid end-user address.
- All EATNs must be served from the same BellSouth Serving Wire Center (SWC).
- All UNE-Ps on a Bulk Request must be migrated to a single UNE-L type
- No end-user moves or changes of address will be allowed on the Bulk Request.
- Non-Recurring rates for the specific loop type being requested will be charged
- Service order charges for mechanized orders (SOMEC) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request.
- A BellSouth Project Manager (PM) will project manage the Bulk Request.
- CLEC must submit a **BellSouth UNE-P to UNE-L Bulk Migration Project Notification**, herein known as **Project Notification,** to the BellSouth PM prior to the CLEC's placing the mechanized Bulk Request.
- CLEC may specify Desired Due Dates (DDD) for each EATN. However, the BellSouth PM will negotiate firm Due Dates for the Bulk Request
- A minimum of two (2) EATNs and up to a maximum of ninety-nine (99) EATNs can be placed on a single Bulk Request
- A maximum of twenty-five (25) end-user telephone numbers per EATN can be placed on a Bulk Request
- No additional EATNs or end-user telephone numbers may be added to the ***BellSouth UNE-P to UNE-L Bulk Migration Project Notification*** form once it has been submitted to the BellSouth PM

UNE-P to UNE-L Bulk Migration

Requirements (continued)

- Order Coordination-Time Specific option is not applicable for a Bulk Request.
- UNE-Ls that require a Service Inquiry and/or Unbundled Loop Modification are excluded from the Bulk Request process
- A Reservation Identification (RESID) (also referred to as a Facility Reservation Number (FRN)) is required on the Bulk Request for Unbundled ADSL Compatible Loops, HDSL Compatible Loops and Unbundled Copper Loop - Designed (UCL-D). Refer to the **Unbundled ADSL and Unbundled HDSL Compatible Loop, UCL-Designed CLEC Information Packages** and **Loop Make-Up CLEC Information Package** for RESID/FRN requirements.
- When a Mechanized Loop Make Up with Facility Reservation Number (FRN) is requested, the CLEC must submit the Bulk Request with the FRN to BellSouth within 24 hours of receiving FRN.
- Firm Order Confirmation (FOC) will be sent on individual LSRs generated from the Bulk Request.
- Upon receipt of a Reject, CLEC must re-submit a corrected Bulk Request or submit a cancellation of the Bulk Request.

4. Options

- Order Coordination (OC) /Coordinated Hot Cut (CHC) is included on the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops. OC is available when the loop is provisioned over an existing circuit that is currently providing service to the end-user.
- OC is available as a chargeable option for conversions to UVL-SL1, UCL-ND and UCL-Designed Loops. OC must be requested at the EATN level on the Project Notification form. An OC charge will be applied to each loop on the EATN for which OC has been requested. OC will be indicated on Project Notification and will not be required on the Bulk Request LSR at this time.
- The CLEC may qualify the existing UNE-P facilities for the UNE-L types requested. For example, through Loop Make-Up (LMU), the CLEC can verify that a UNE-P facility being migrated is not on an Integrated Digital Loop Carrier (IDLC). When the existing UNE-P facility is on IDLC, the CLEC can reserve alternate compatible facilities if available.

UNE-P to UNE-L Bulk Migration

5. Bulk Migration Submission/Flow Process

The Bulk Request Submission Process will consist of two main work activities The CLEC will first submit a Project Notification. Once the Project Notification has been processed and returned to the CLEC, the CLEC will then prepare and input the mechanized Bulk Request. The Bulk Request must be submitted according to the guidelines contained in the **Local Ordering Handbook.** Below are the steps in the process :

Step #	Action
1	PM receives Project Notification form from CLEC and negotiates/assigns Bulk Order Package Identifier (BOPI) and validates information (i.e., USOCs, Same Wire Center, etc.).
2	If pertinent information is missing on the Project Notification package, the form is returned to CLEC along with a reason(s) for return. PM receives corrected Project Notification from the CLEC and continues the negotiation process.
3	PM contacts BellSouth's Network organization and negotiates Due Date (DD) for all related Purchase Order Numbers (PONs) in the Bulk package and returns Bulk Notification Form including negotiated DD to the CLEC.
4	Upon receipt of the Bulk Notification Form that includes negotiated DD from PM, CLEC submits Bulk Request package with negotiated dates for each EATN/PON via electronic ordering interface.
5	If the CLEC wants to supplement (SUP) (01,02,03) an individual PON, the request must be sent through the same electronic ordering system as the original Bulk Request.
6	At this point, the Bulk Request package will be processed for 1st level validation and any rejects will be mechanically generated to the CLEC.
7	The electronic ordering systems will accept the Bulk Request package, break the individual PONs into separate LSRs and populate the remaining required LSR fields from Operation Support System (OSS) systems prior to sending the individual LSRs downstream to the Local Number Portability (LNP) Gateway.
8	The LNP Gateway will perform 2nd level validations and provide any fallouts, per "business as usual" processes The Local Carrier Service Center (LCSC) will handle all fallouts as normal. Any of the individual PONs that must be clarified will be sent back to the CLEC, business as usual
9	After LNP Gateway issues the service orders, the LCSC will handle all manual service order fallouts as normal. The BellSouth Service Representative will send any PF and Missed Appointments (MA) to the CLEC via a jeopardy notice
10	LNP Gateway will send an FOC on each individual PON associated with the Bulk Request package, to the CLEC
11	The Project Manager will monitor PON, Service Order and Porting Statuses associated with the Bulk Request package BellSouth's Service Representative and Project Manager will monitor the LNP gateway for the "Number Ported" messages and the Service Representative will handle manual port out order processing if required.

6. BellSouth UNE-P to UNE-L Bulk Migration Project Notification Process

Following is the Project Notification process:

- Complete the **BellSouth UNE-P to UNE-L Bulk Migration Project Notification** form according to the instructions.
- Electronically submit the ***Project Notification*** to the email address of the CLEC's assigned BellSouth Project Manager (PM). For help with identifying a Project Manager, contact your BellSouth Customer Support Manager.
- The BellSouth PM will review the information submitted by the CLEC and will assign a Bulk Order Package Identifier (BOPI) that the CLEC will later use on the electronic Bulk Request.
- The BellSouth PM will coordinate with BellSouth's field forces to schedule the migration Due Dates.
- Once the review with the field forces is complete, the BellSouth PM will include the Due Dates on the ***Project Notification*** and return it to the CLEC.
- No additional EATNs or end-user telephone numbers may be added to the ***Project Notification*** form once it has been submitted to the BellSouth PM.

UNE-P to UNE-L Bulk Migration

7. UNE-P USOCs

The UNE-P Services that can be migrated to UNE-L are represented by the Port USOCs listed in the table below:

Port USOC	Unbundled Port/Loop Combination Element	Description of Combinations using an Unbundled Exchange Port (UEP):
UEPBX	UEPLX	UEP, Business, 2 Wire Analog Business Line Port, UNE=P Basic Class of Service
UEPRX	UEPLX	UEP, Residence, 2 Wire Analog Residence Line Pot, UNE-P Basic Class of Service
UEPCO	UEPLX	UEP, Coin Basic Class of Service UNE-P
UEPBV	UEPLX	UEP, Remote Call Forwarding, Business Basic Class of Service
UEPVR	UEPLX	UEP, Remote Call Forwarding, Residence Basic Class of Service

8. UNE-L USOCs

Below are the UNE-L types and associated USOCs to which the UNE-Ps can be migrated:

Loop USOC	Description
UEAL2	2 Wire Unbundled Voice Loop – SL1
UEAL2, UEAR2	2 Wire Unbundled Voice Loop – SL2
UCLPW	2 Wire Unbundled Copper Loop/Short– Designed without manual Service Inquiry
UCL2W	2 Wire Unbundled Copper Loop/Long - Designed without manual Service Inquiry
UCL4W	4 Wire Unbundled Copper Loop/Short – Designed without manual Service Inquiry
UCL4O	4 wire Unbundled Copper Loop/Long – Designed without manual Service Inquiry
UEQ2X	2 Wire Unbundled Copper Loop – Non-Designed
UAL2W	2 Wire Unbundled ADSL Loop without manual Service Inquiry
UHL2W	2 Wire Unbundled HDSL Loop without manual Service Inquiry
UHL4W	4 Wire Unbundled HDSL Loop without manual Service Inquiry

UNE-P to UNE-L Bulk Migration

9. Intervals

9.1 BellSouth UNE-P to UNE-L Bulk Migration Project Notification Interval

- The "*PM Targeted Response Interval*" column in the table below represents the targeted number of business days in which the PM will respond back to the CLEC.
- CLEC must submit the **Project Notification** in advance of the earliest CLEC's requested Desired Due Date (DDD) according to the "*Minimum # of days in advance to submit Project Notification*" column in the table below. This column represents the number of days that the Project Notification must be submitted in advance of the earliest DDD
- "*Minimum # of days*" includes the interval for the Project Manager to negotiate the Due Dates. It also allows three (3) days for the CLEC to correct, process and submit mechanized Bulk Request and it includes 14 days in order to meet the 14-business day submission requirement for the Bulk Request.
- The PM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

# of end-user Tel. Numbers	PM Targeted Response Interval	CLEC days after receipt from Proj Mgr	Bulk Request Submission Requirement	Minimum # of days in advance to submit Project Notification
Maximum of 99	7 business days	3 business days	14 business days	24 business days
100-200	10 business days	3 business days	14 business days	27 business days
201 +	To be determined	3 business days	14 business days	Contact PM

9.2 Bulk Request Service Order Intervals

- The BellSouth Project Manager will negotiate the Bulk Request due dates with BellSouth's provisioning personnel and will communicate the due date to the CLEC.
- The CLEC must submit the Bulk Request and it must be accepted by the mechanized system at least 14 business days in advance of the earliest Due Date for any end-user telephone number to be migrated.

9.3 Example of Intervals

An example of Intervals follows:

CLEC submits Project Notification with 87end-user telephone numbers on May 1, 2003

- May 12, 2003 (7 business days) – CLEC receives Project Notification with firm Due Dates
- May 12 – May 15 (3 business days) – CLEC will prepare and submit mechanized Bulk request via the electronic interface
- June 5, 2003 (14 business days) – the earliest PM assigned Due Date on the Project Notification returned to the CLEC

10. Acronyms

ADSL	Asymmetrical Digital Subscriber Line
BOPI	Bulk Order Package Identifier
CHC	Coordinated Hot Cut
CLEC	Competitive Local Exchange Carrier
DDD	Desired Due Date
EATN	Existing Account Telephone Number
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
HDSL	High-Bit-Rate Digital Subscriber Line
LCSC	Local Carrier Service Center
LNP	Local Number Portability
LSR	Local Service Request
MDF	Main Distribution Frame
OC	Order Coordination
OSS	Operation Support System
PM	Project Manager
PON	Purchase Order Number
RESID	Reservation Identification
RSAG	Regional Street Address Guide
SWC	Serving Wire Center
UCL-D	Unbundled Copper Loop – Designed
UCL-ND	Unbundled Copper Loop – Non-Designed
UNE-P	Unbundled Network Element-Port/Loop Combination
UNE-L	UNE Loop

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June 9, 2003

Phillip Cook
BellSouth Interconnection Services
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RE: NBR GA02-M931-00 Unbundled Network Element – Platform (UNE-P) to UNE-Loop (UNE-L) Coordinated Bulk Conversion Process

Dear Phillip:

The purpose of this letter is to respond to your letter of May 30, 2003, regarding New Business Request (NBR) GA02-M931-00. Your letter stated that BellSouth, pursuant to Section 1.10 of Attachment 10 of the Interconnection Agreement, would consider the NBR cancelled if an acceptance or rejection response was not provided within five (5) days.

In its initial request on August 30, 2002, AT&T indicated that BellSouth's current hot cut methods were "unreliable, uneconomical and incapable of sustaining commercial volumes in a competitive environment" and proposed a new process, designed to address each concern. Unfortunately, BellSouth has failed to adequately address these concerns.

First, AT&T is disappointed that BellSouth did not provide adequate information regarding the impact to customers served by BellSouth's IDLC facilities. Further, AT&T requested a process, which would allow the conversion of up to 500 customers in two (2) central offices per evening. In its letter of November 20, 2002, BellSouth states,

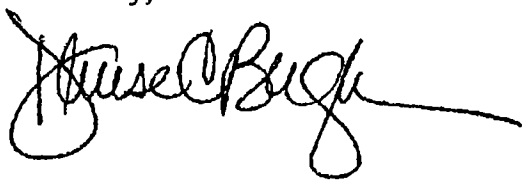
> "BellSouth has determined that AT&T's request is technically feasible with the following caveat:
>
> - The quantity of physical facilities and telephone numbers cut per evening will vary based on the load at the time the request is submitted, and will be driven by the actual number of lines per customer."

AT&T is distressed and concerned with this stated inability of BellSouth to sustain reasonable commercial volumes. AT&T finds BellSouth's unwillingness to commit to AT&T's modest request completely unacceptable.

Finally, BellSouth's ridiculous and excessive cost of $134.32 per working telephone number, plus regular ordering charges, as well as other unspecified overtime and technician charges, prohibits commercial use. BellSouth has once again presented AT&T with a Hobson's choice: risk a devastating disruption of a customer's service or pay BellSouth a ransom to mitigate the risk.

Please consider this letter a rejection of BellSouth's preliminary analysis and firm quote.

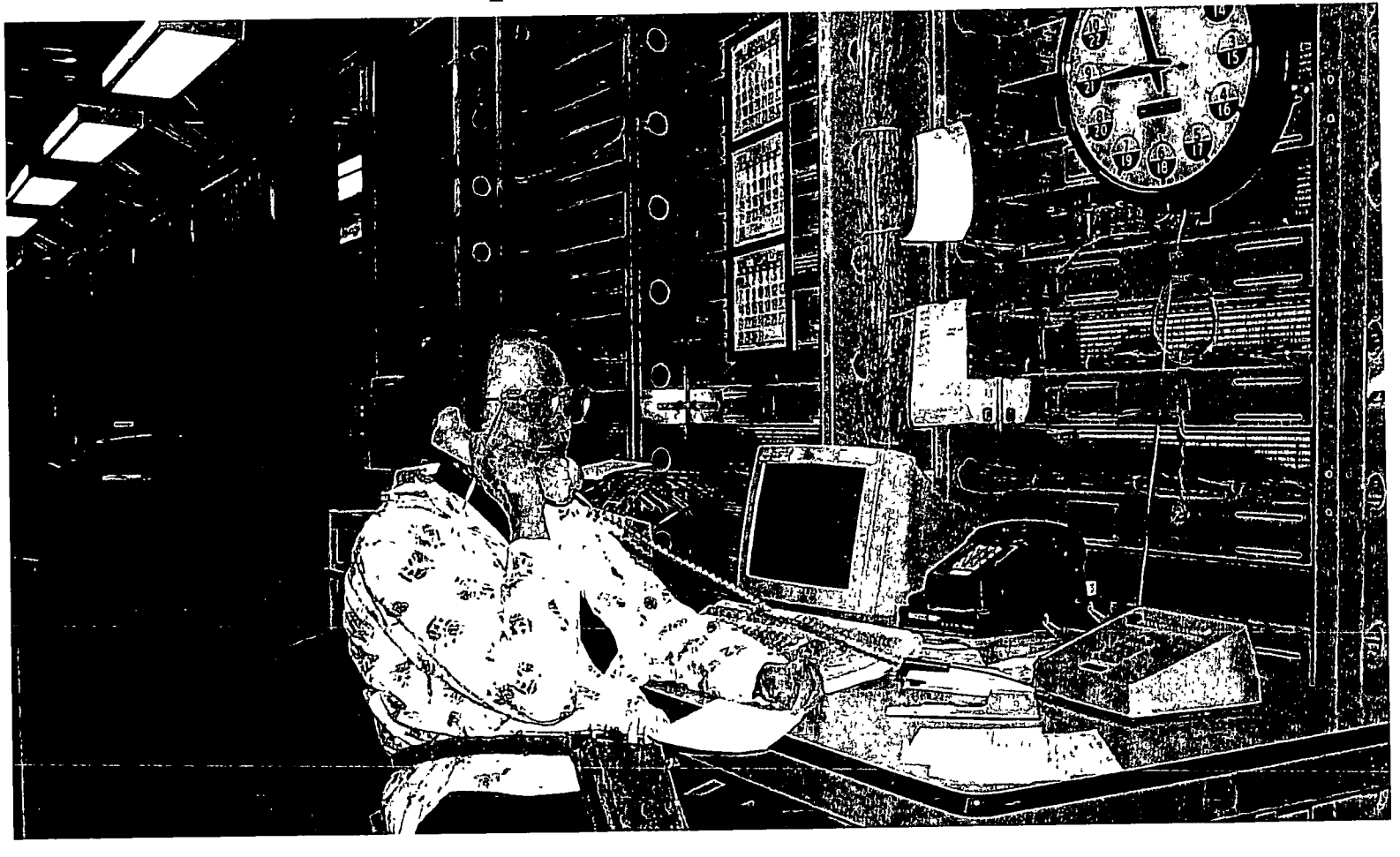
Sincerely,



cc: Steve Huels
Jim Schenk

LOOP CUTOVER PROCESS

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



TRA Docket No. 03-00526
Direct Testimony of Mark Van De Water
Exhibit: MDV-6

BELLSOUTH

BellSouth
Suite 900
1133-21st Street, N.W
Washington, D.C. 20036-3351

robert.blau@bellsouth.com

Robert T. Blau, Ph.D., CFA
Vice President-Executive and
Federal Regulatory Affairs

202 463-4108
Fax 202 463-4631

December 24, 2002

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte in WC Docket No. 01-338

Dear Ms Dortch:

On December 23, 2002, Pete Martin, Jonathan Banks, Keith Milner, Ken Ainsworth and the undersigned met with William Maher, Jeffrey Carlisle and Rich Lerner of the Wireline Competition Bureau.

The purpose of this meeting was to discuss BellSouth's ability to hot-cut UNE-P to UNE-L lines, as well as BellSouth retail to UNE-L lines, in a timely and efficient manner. Details of the discussion are summarized in the attached document.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place them in the record of the proceeding identified above.

Sincerely,

Robert T. Blau/pdl

Attachment

cc: William Maher
Jeffrey Carlisle
Rich Lerner

TRA Docket No. 03-00526
Direct Testimony of Mark Van De Water
Exhibit: MDV-7

Migrations to UNE-P
Tennessee

BST
GA Dkt 17749-U
ATT's 1st Interrogtories Item No. 32

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	115	11414	803	1442	25	9144	1073	852	221	8071	82.0%	20.6%	18.0%
Aug-02	97	22106	685	3050	48	18323	2251	1844	407	16072	86.0%	18.1%	14.0%
Sep-02	62	13159	575	2093	41	10450	1158	932	226	9292	85.6%	19.5%	14.4%
Oct-02	133	16156	953	2775	35	12393	939	788	151	11454	85.9%	16.1%	14.1%
Nov-02	159	17936	866	3108	34	13928	946	767	179	12982	87.9%	18.9%	12.1%
Dec-02	255	15353	556	2711	45	12041	1297	971	326	10744	85.8%	25.1%	14.2%
Jan-03	223	14157	534	2294	24	11305	1348	1060	288	9957	84.6%	21.4%	15.4%
Feb-03	190	16019	687	2646	20	12666	902	657	245	11764	88.5%	27.2%	11.5%
Mar-03	187	17499	792	2819	27	13861	876	611	265	12985	89.1%	30.3%	10.9%
Apr-03	137	22228	996	3561	32	17639	868	636	232	16771	90.5%	26.7%	9.5%
May-03	142	17795	806	2711	24	14254	615	374	241	13639	91.2%	39.2%	8.8%
Jun-03	143	20657	843	2611	55	17148	1827	955	872	15321	88.8%	47.7%	11.2%
Jul-03	149	23100	1179	1686	55	20180	3882	683	3199	16298	89.0%	82.4%	11.0%
Aug-03	154	18450	958	1613	36	15843	3085	513	2572	12758	88.7%	83.4%	11.3%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
Tennessee

BST
GA Dkt 17749-U
ATT's 1st Interrogatories Item No. 28

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	50	144	53	6	0	85	21	11	10	64	36.0%	47.6%	64.0%
Aug-02	40	132	48	5	0	79	38	30	8	41	25.8%	21.1%	74.2%
Sep-02	41	116	48	1	0	67	59	40	19	8	5.8%	32.2%	94.2%
Oct-02	33	155	71	0	0	84	73	47	26	11	6.8%	35.6%	93.2%
Nov-02	16	117	18	1	0	98	89	62	27	9	8.6%	30.3%	91.4%
Dec-02	38	122	25	2	0	95	76	51	25	19	14.3%	32.9%	85.7%
Jan-03	31	311	43	12	0	256	102	79	23	154	50.2%	22.5%	49.8%
Feb-03	27	130	30	3	0	97	52	40	12	45	31.7%	23.1%	68.3%
Mar-03	25	178	57	6	0	115	98	70	28	17	10.1%	28.6%	89.9%
Apr-03	12	157	33	4	0	120	106	88	18	14	9.5%	17.0%	90.5%
May-03	17	227	61	11	0	155	142	106	36	13	6.6%	25.4%	93.4%
Jun-03	57	102	38	1	0	63	50	43	7	13	8.6%	14.0%	91.4%
Jul-03	17	119	39	4	0	76	44	36	8	32	25.8%	18.2%	74.2%
Aug-03	14	131	41	8	0	82	44	38	6	38	29.0%	13.6%	71.0%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's) - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

TRA Docket No. 03-00526
Direct Testimony of Mark Van De Water
Exhibit: MDV-9

Attachment
Response to Item No. 1

CLLI	Address	City	ST	ZIP	MANNED	HOST/REMOTE	HOST
ACHLTNMT	7356 HWY 41N	ADAMS	TN	37032	N	Remote	HDVLTNMADS0
ARTNTNMT	11950 WALKER ST	ARLINGTON	TN	38002	N	Remote	MMPHTNBADS0
ASCYTNMA	106 MULBERRY ST	ASHLAND CITY	TN	37015	Y		
ATHNTNMA	202 N HILL ST	ATHENS	TN	37303	Y	Host	
BGSNTNMA	141 EASY ST	BIG SANDY	TN	38221	N	Remote	PARSTNMADS1
BLGPTNMA	415 HIGHWAY 11 E	BULLS GAP	TN	37711	N	Remote	JFCYTNMADS1
BLLSTNMA	105 HOPKINS AV	BELLS	TN	38006	N	Remote	BWVLTNMADS1
BLNCTNMT	55 BLANCHE RD	TAFT	TN	38488	N	Remote	MNCHTNMADS0
BLVRTNMA	305 LA*FAYETTE ST	BOLIVAR	TN	38008	Y	Host	
BNTNTNMT	200 CLEMMER FERRY RD	BENTON	TN	37307	Y	Remote	CLEVTNMADS0
BTSPTNMA	244 FRONT ST	BETHEL SPRINGS	TN	38315	N	Remote	SVNHTNMTDS0
BWVLTNMA	125 JEFFERSON ST W	BROWNSVILLE	TN	38012	Y	Host	
CHRLTNMT	108 DUNNING ST	CHARLOTTE	TN	37036	N	Remote	WHBLTNMTDS0
CHTGTNBR	505 AIRPORT RD	CHATTANOOGA	TN	37421	Y		
CHTGTNDT	2605 DUNCAN AV	CHATTANOOGA	TN	37404	Y		
CHTGTNHT	6222 HIGHWAY 58	HARRISON	TN	37341	N		
CHTGTNMV	1710 CRABTREE RD	HIXSON	TN	37343	Y	Host	
CHTGTNNS	300 E M L KING BLVD	CHATTANOOGA	TN	37403	Y	Host	
CHTGTNRB	105 W LEAWOOD AV	CHATTANOOGA	TN	37415	Y	Host	
CHTGTNRO	832 CHICKAMAUGA AV	ROSSVILLE	TN	30741	Y		
CHTGTNSE	4608 ST ELMO AV	CHATTANOOGA	TN	37409	Y		
CHTGTNSM	802 KENTUCKY AV	SIGNAL MOUNTAIN	TN	37377	N	Remote	CHTGTNRBDS0
CHTNTNMT	112 SCOTT ST NE	CHARLESTON	TN	37310	N	Remote	CLEVTNMADS0
CLDGTNMA	216 AHN SHAWANEE RD	CUMBERLAND GAP	TN	37752	Y		
CLEVTNMA	549 BROAD ST NW	CLEVELAND	TN	37311	Y	Host	
CLMATNMA	904 S HIGH ST	COLUMBIA	TN	38401	Y	Host	
CLTNTNMA	127 E CHURCH ST	CLINTON	TN	37716	Y	Host	
CLVLTNMA	417 MADISON ST	CLARKSVILLE	TN	37043	Y	Host	
CMCYTNMT	322 HIGHWAY 434	CUMBERLAND CITY	TN	37050	N	Remote	CLVLTNMADS0
CMDNTNMA	134 DERBY ST	CAMDEN	TN	38320	Y	Remote	HNTGTNMADS0
CNHMTNMA	5090 HIGHWAY 48	CUNNINGHAM	TN	37051	N	Remote	CLVLTNMADS0
CNVLTNMA	101 E SWAN ST	CENTERVILLE	TN	37033	N	Remote	DKSNTNMTDS0
CRHLTNCB	12 NEWTON ST	COPPERHILL	TN	37317	N	Remote	CLEVTNMADS0
CRPLTNMA	5013 EAST ROBERTSON RD	CROSS PLAINS	TN	37049	N	Remote	HDVLTNMADS0
CRTHTNMA	221 WARD AV E	CARTHAGE	TN	37030	N	Remote	LBNNTNMADS0
CRVLTNMA	105 WALNUT ST	COLLIERVILLE	TN	38017	Y		

Attachment
Response to Item No. 1

CULKTNMA	2337 SCHOOL ST	CULLEOKA	TN	38451	N	Remote	CLMATNMADS0
CVTNTNMT	569 S COLLEGE ST	COVINGTON	TN	38019	Y		
DCTRTNMT	75 AHN HIGHWAY 30 E	DECATUR	TN	37322	N	Remote	ATHNTNMADS0
DKSNTNMT	305 N CHARLOTTE ST	DICKSON	TN	37055	Y	Host	
DNRGTNMA	203 E MEETING ST	DANDRIDGE	TN	37725	Y	Host	
DOVRTNMT	407 SPRING ST	DOVER	TN	37058	N	Remote	CLVLTNMADS0
DYBGTNMA	405 TROY AV	DYERSBURG	TN	38024	Y	Host	
DYERTNMT	160 S MAIN ST	DYER	TN	38330	N	Remote	HMBLTNMADS1
DYTNTNMA	116 S RAILROAD ST	DAYTON	TN	37321	Y		
EAVLTNMA	171 HIGHWAY 99	EAGLEVILLE	TN	37060	N	Remote	MRBOTNMADS0
ETWHTNMT	105 6TH ST	ETOWAH	TN	37331	N	Remote	MDVITNMTDS0
FIVLTNMA	205 E HILL AV	FRIENDSVILLE	TN	37737	N	Remote	MAVLTNMADS0
FKLNTNCC	232 SEABOARD LN	FRANKLIN	TN	37067	N	Remote	NSVLTNBWDS0
FKLNTNMA	327 CUMMINS ST	FRANKLIN	TN	37064	Y	Host	
FLVLTNMA	6 ELORA RD	FLINTVILLE	TN	37335	N	Remote	MNCHTNMADS0
FRDNTNMA	4599 OLD ASHLAND CITY RD S	CLARKSVILLE	TN	37043	N	Remote	CLVLTNMADS0
FRVWTNMT	7112 ADAMS DR	FAIRVIEW	TN	37062	N	Remote	NSVLTNWMDS0
FYVLTNMA	202 FRANKLIN AV N	FAYETTEVILLE	TN	37334	N	Host	
GALLTNMA	214 W SMITH ST	GALLATIN	TN	37066	Y	Host	
GBSNTNMT	408 ROZELLE ST	GIBSON	TN	38343	N	Remote	HMBLTNMADS1
GDJTTNMA	140 CHARLESTON ROW E	GRAND JUNCTION	TN	38039	N	Remote	BLVRTNMADS1
GDVLTNMA	410 N MAIN ST	GOODLETTSVILLE	TN	37072	Y	Remote	NSVLTNMCDS0
GLSNTNMA	107 JANES MILL RD	GLEASON	TN	38229	N	Remote	HMBLTNMADS1
GNBRTNMA	1003 SWIFT ST	GREENBRIER	TN	37073	N	Remote	SPFDTNMADS0
GNFDTNMT	207 N SECOND ST	GREENFIELD	TN	38230	N		
GRNBTNMA	7750 HWY 95 S	GREENBACK	TN	37742	N	Remote	LNCYTNMADS0
GTBGTNMT	420 TRENTHAM LN	GATLINBURG	TN	37738	Y		
GTWSTNSW	3355 PLAYERS CLUB PKWY	MEMPHIS	TN	38125	N	Remote	MMPHTNCKDS0
HDVLTNMA	121 WALTON FERRY RD	HENDERSONVILLE	TN	37075	Y	Host	
HHNWTNMA	14 W 1ST AV	HOHENWALD	TN	38462	Y	Remote	CLMATNMADS0
HIMNTNMA	501 CARTER ST	HARRIMAN	TN	37748	Y	Remote	CLTNTNMADS0
HLLSTNMT	479 S CHURCH ST	HALLS	TN	38040	N	Remote	DYBGTNMADS0
HMBLTNMA	1513 MAIN ST	HUMBOLDT	TN	38343	Y	Host	
HMPSTNMA	4110 CHURCH ST	HAMPSHIRE	TN	38461	N	Remote	CLMATNMADS0
HNLDTNMA	712 MAIN ST	HUNTLAND	TN	37345	N	Remote	MNCHTNMADS0
HNNGTNMA	205 N CHAPMAN ST	HENNING	TN	38041	N	Remote	DYBGTNMADS0
HNSNTNMT	135 NORTH AV	HENDERSON	TN	38340	Y	Remote	SVNHTNMTDS0

Attachment
Response to Item No. 1

HNTGTNMA	132 6TH AV	HUNTINGDON	TN	38344	Y	Host	
HRFRTNMA	3620 HARTFORD RD	HARTFORD	TN	37753	N	Remote	NWPTTNMTDS0
HRNBTNMT	211 WILLIAMS ST	HORNBEAK	TN	38232	N	Remote	UNCYTNMADS0
HTVLTNMA	107 ANDREWS AVENUE	HARTSVILLE	TN	37074	N	Remote	LBNNTNMADS0
JCSNTNMA	315 E COLLEGE ST	JACKSON	TN	38301	Y		
JCSNTNNS	504 OLD HICKORY BLVD	JACKSON	TN	38305	Y		
JFCYTNMA	717 E COLLEGE ST	JEFFERSON CITY	TN	37760	Y	Host	
JLLCTNMA	606 FIFTH ST	JELLICO	TN	37762	Y	Remote	LFLTTNMADS0
JSPRTNMT	6 ACADEMY AV	JASPER	TN	37347	Y		
KGTNTNMT	411 N KENTUCKY ST	KINGSTON	TN	37763	Y		
KNTNTNMA	300 W TAYLOR ST	KENTON	TN	38233	N	Remote	UNCYTNMADS0
KNVLTNBE	4605 LYONS VIEW PKE	KNOXVILLE	TN	37919	Y		
KNVLTNFC	135 LYNNWOOD DR	KNOXVILLE	TN	37918	Y		
KNVLTNMA	410 MAGNOLIA AVE	KNOXVILLE	TN	37917	Y		
KNVLTNWH	1701 WINSTON RD	KNOXVILLE	TN	37919	Y		
KNVLTNYH	131 E YOUNG HIGH PKE	KNOXVILLE	TN	37920	Y		
LBNNTNMA	230 W GAY ST	LEBANON	TN	37087	Y	Host	
LFLTTNMA	518 W ASH ST	LAFOLLETTE	TN	37766	Y	Host	
LKCYTNMA	220 FIFTH ST	LAKE CITY	TN	37769	N	Remote	CLTNTNMADS0
LNCYTNMA	315 BROADWAY W	LENOIR CITY	TN	37771	Y	Host	
LODNTNMA	407 CEDAR ST	LOUDON	TN	37774	Y	Remote	LNCYTNMADS0
LRBGTNMA	313 E GAINES ST	LAWRENCEBURG	TN	38464	Y		
LWBGTNMA	425 W CHURCH ST	LEWISBURG	TN	37091	Y		
LXTNTNMA	31 CHURCH ST W	LEXINGTON	TN	38351	Y		
LYBGTNMT	30 MAIN ST	LYNCHBURG	TN	37352	N	Remote	TLLHTNMADS0
LYLSTNMA	4899 HIGHWAY 100	LYLES	TN	37098	N	Remote	DKSNTNMTDS0
LYVLTNMA	1218 MAIN ST	LYNNVILLE	TN	38472	N	Remote	CLMATNMADS0
MAVLTNMA	285 S HALL RD	ALCOA	TN	37701	Y	Host	
MCKNTNMA	434 WALNUT AV W	MCKENZIE	TN	38201	Y	Remote	PARSTNMADS1
MCWNTNMT	58 COLLEGE ST N	MCEWEN	TN	37101	N	Remote	WHBLTNMTDS0
MDTNTNMA	120 MOCKINGBIRD RD	MIDDLETON	TN	38052	N	Remote	BLVRTNMADS1
MDVITNMT	153 COLLEGE ST.	MADISONVILLE	TN	37354	Y	Host	
MEDNTNMA	236 MARKET AV	MEDINA	TN	38355	N	Remote	TRTNTNMADS0
MILNTNMA	2005 S SECOND ST	MILAN	TN	38358	Y	Remote	HMBLTNMADS1
MMPHTNBA	5530 STAGE RD	BARTLETT	TN	38128	Y	Host	
MMPHTNCK	3106 BARRON AV	MEMPHIS	TN	38111	Y	Host	
MMPHTNCT	105 S HOLMES ST	MEMPHIS	TN	38111	Y		

MMPHTNEL	4960 BLACK RD	MEMPHIS	TN	38117	Y		
MMPHTNFR	1535 DELLWOOD AV	MEMPHIS	TN	38127	Y		
MMPHTNGT	2101 S GERMANTOWN RD	GERMANTOWN	TN	38138	Y	Host	
MMPHTNHP	6363 HUMPHREYS BLVD	MEMPHIS	TN	38119	N	Remote	MMPHTNGTDS0
MMPHTNMA	201 COURT AV	MEMPHIS	TN	38103	Y		
MMPHTNMT	1430 MADISON AV	MEMPHIS	TN	38104	Y		
MMPHTNOA	3705 OUTLAND RD	MEMPHIS	TN	38118	Y		
MMPHTNSL	4230 FARONIA RD	MEMPHIS	TN	38116	Y		
MMPHTNST	1389 S LAUDERDALE ST	MEMPHIS	TN	38106	Y		
MMPHTNWW	4787 WEAVER RD	MEMPHIS	TN	38109	Y		
MNCHTNMA	401 E MAIN ST	MANCHESTER	TN	37355	Y	Host	
MNPLTNMA	112 HAYLONG AV	MT PLEASANT	TN	38474	N	Remote	CLMATNMADS0
MRBOTNMA	221 N CHURCH ST	MURFREESBORO	TN	37130	Y	Host	
MRTWTNMA	301 E MAIN ST	MORRISTOWN	TN	37814	Y		
MSCTTNMT	9436 JOHNSON RD	STRAWBERRY PLAINS	TN	37871	Y		
MSCWTNMA	300 THIRD AV	MOSCOW	TN	38057	N	Remote	SOVLTNMTDS0
MYVLTNMA	115 PROSPECT RD	MAYNARDVILLE	TN	37807	N	Remote	OKRGTNMTDS0
NRRSTNMA	13 DEER RIDGE RD	NORRIS	TN	37828	N	Remote	OKRGTNMTDS0
NSVLTNAA	651 DONELSON PKE	NASHVILLE	TN	37214	N	Remote	NSVLTNWMDS0
NSVLTNAP	1335 MURFREESBORO PKE	NASHVILLE	TN	37217	Y		
NSVLTNBH	1630 HARDING PL	NASHVILLE	TN	37215	N	Remote	NSVLTNMTDS1
NSVLTNBV	907 TODD PREIS DR	NASHVILLE	TN	37221	Y		
NSVLTNBW	102 HIGH LEA RD	BRENTWOOD	TN	37027	Y	Host	
NSVLTNCD	6405 CENTENNIAL BLVD	NASHVILLE	TN	37209	N	Remote	NSVLTNWMDS0
NSVLTNCH	409 ELYSIAN FIELDS RD	NASHVILLE	TN	37211	Y	Host	
NSVLTNDO	158 MC*GAVOCK PKE	NASHVILLE	TN	37214	Y		
NSVLTNHH	5200 CANE RIDGE RD	ANTIOCH	TN	37013	N	Remote	NSVLTNCHDS0
NSVLTNIN	1224 GALLATIN AV	NASHVILLE	TN	37206	Y		
NSVLTNMC	209 WOODRUFF ST	MADISON	TN	37115	Y	Host	
NSVLTNMT	185 2ND AV N	NASHVILLE	TN	37201	Y		
NSVLTNST	3203 HILLSIDE DR	NASHVILLE	TN	37212	Y		
NSVLTNUN	2222 ELLISTON PL	NASHVILLE	TN	37203	Y		
NSVLTNWC	4060 LLOYD RD	WHITES CREEK	TN	37218	Y		
NSVLTNWM	904 DAVIDSON DR	NASHVILLE	TN	37205	Y	Host	
NWBRTNMA	105 E JOHNSON ST	NEWBERN	TN	38059	N	Remote	DYBGTNMADS0
NWPTTNMT	400 LAKEVIEW ST	NEWPORT	TN	37821	Y	Host	
OKRGTNMT	119 MILAN WAY	OAK RIDGE	TN	37830	Y	Host	

OLHCTNMA	1002 NINTH ST	OLD HICKORY	TN	37138	N	Remote	NSVLTNMCDS0
OLSPTNMA	502 WINTER GAP RD	OLIVER SPRINGS	TN	37840	N	Remote	OKRGTNMTDS0
PARSTNMA	507 DUNLAP ST	PARIS	TN	38242	Y	Host	
PLMYTNMA	2730 PALMYRA RD	PALMYRA	TN	37142	N	Remote	CLVLTNMADS0
PLSKTNMA	117 S THIRD ST	PULASKI	TN	38478	Y		
PSVWTNMT	2519 HIGHWAY 49 E	PLEASANT VIEW	TN	37146	N	Remote	DKSNTNMTDS0
PTBGTNMA	106 MORGAN AV	PETERSBURG	TN	37144	N	Remote	FYVLTNMADS0
PTLDTNMA	101 WHEELER ST	PORTLAND	TN	37148	N	Remote	GALLTNMADS0
RDGLTNMA	530 LAKE ST	RIDGELY	TN	38080	N	Remote	DYBGTNMADS0
RKWDTNMA	201 S KINGSTON AV	ROCKWOOD	TN	37854	N	Remote	CLTNTNMADS0
RPLYTNMA	148 LAKE DR	RIPLEY	TN	38063	Y		
RRVLTNMA	324 CLINCH ST	ROGERSVILLE	TN	37857	Y	Host	
SANGTNMT	170 SANGO DR	SANGO	TN	37043	N	Remote	CLVLTNMADS0
SDDSTNMA	10360 WALDEN ST	SODDY-DAISY	TN	37379	N	Remote	CHTGTNMVDS0
SEWNTNMW	60 WILLIE SIX RD	SEWANEE	TN	37375	N	Remote	MNCHTNMADS0
SHVLTNMA	104 S JEFFERSON ST	SHELBYVILLE	TN	37160	Y	Host	
SLMRTNMT	280 W. WARREN AVE	SELMER	TN	38375	Y		
SMTWTNMA	54 OAK ST	SUMMERTOWN	TN	38483	N	Remote	CLMATNMADS0
SMYRTNMA	104 DIVISION ST	SMYRNA	TN	37167	Y		
SNTFTNMA	2656 SANTA FE PKE	SANTA FE	TN	38482	N	Remote	CLMATNMADS0
SNVLTNMA	8 JAIL ST	SNEEDVIILE	TN	37869	N	Remote	JFCYTNMADS1
SOHNMSDC	7060 INDUSTRIAL DR 302	SOUTHAVEN	TN	38671	N	Remote	MMPHTNGTDS0
SOVLTNMT	310 ARMOUR DR	SOMERVILLE	TN	38068	Y	Host	
SPBGTNMA	105 FOURTH ST	SOUTH PITTSBURG	TN	37380	N	Remote	CHTGTNNSDS1
SPCYTNMT	184 PICCADILLY AV	SPRING CITY	TN	37381	N	Remote	CHTGTNMVDS0
SPFDTNMA	1007 CHEATHAM ST	SPRINGFIELD	TN	37172	Y	Host	
SPHLTNMT	310 HARDIN ALLEY	SPRING HILL	TN	37174	N	Remote	CLMATNMADS0
SRVLTNMA	43 CHURCH ST	SURGOINSVILLE	TN	37873	N	Remote	RRVLTNMADS0
SVNHTNMT	210 PICKWICK ST N	SAVANNAH	TN	38372	Y	Host	
SVVLTNMT	110 SOUTH BLVD	SEVIERVILLE	TN	37862	Y		
SWTWTNMT	204 MILL ST	SWEETWATER	TN	37874	N	Remote	MDVITNMTDS0
TLLHTNMA	208 N JACKSON ST	TULLAHOMA	TN	37388	Y	Host	
TPVLTNMA	310 WALNUT ST	TIPTONVILLE	TN	38079	N	Remote	DYBGTNMADS0
TRINTNMA	3004 OLD MURFREESBORO RD	COLLEGE GROVE	TN	37046	N	Remote	FKLNTNMADS0
TROYTNMT	225 W POLK ST	TROY	TN	38260	N	Remote	UNCYTNMADS0
TRTNTNMA	303 S COLLEGE ST	TRENTON	TN	38382	Y	Host	
TWNSTNMA	7709 RIVER RD	TOWNSEND	TN	37882	N	Remote	MAVLTNMADS0

UNCYTNMA	405 HARRISON ST	UNION CITY	TN	38261	Y	Host	
VNLRTNMA	4505 HIGHWAY 49 W	VANLEER	TN	37181	N	Remote	DKSNTNMTDS0
WHBLTNMT	225 COMMERCE ST	WHITE BLUFF	TN	37187	N	Host	
WHHSTNMA	205 PORTLAND RD	WHITE HOUSE	TN	37188	N	Remote	HDVLTNMADS0
WHPITNMA	1910 WALNUT ST	WHITE PINE	TN	37890	N	Remote	DNRGTNMADS0
WHVLTNMT	218 SYCAMORE ST	WHITEVILLE	TN	38075	N	Remote	BLVRTNMADS1
WHWLTNMA	132 E SPRING ST	WHITWELL	TN	37397	N	Remote	CHTGTNNSDS1
WLPTTNMA	709 MAIN ST	PROSPECT	TN	38487	N	Remote	CLMATNMADS0
WNCHTNMA	117 S JEFFERSON ST	WINCHESTER	TN	37398	Y		
WRTRTNMT	115 MILL ST	WARTRACE	TN	37183	N	Remote	SHVLTNMADS0
WTTWTNMA	220 W WOODLAND ST	WATERTOWN	TN	37184	N	Remote	LBNNTNMADS0
WVRLTNMT	201 W WYLY ST	WAVERLY	TN	37185	N	Remote	DKSNTNMTDS0

REQUEST: With respect to the Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all documents containing or pertaining to performance data, studies, or other information that support the benchmark of 95% within 4 hours window for IDLC loops.

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

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

If the interval for hot cuts involving IDLC is less than four hours, then in order to satisfy this measurement, BellSouth will have to dispatch a technician prior to the time the hot cut is scheduled to make a line and station transfer (LST) to place the customer service on a non-integrated facility. This approach requires additional work time for the technician, which is currently performed before the scheduled hot cut. Although this extra work means additional cost to BellSouth, which is not covered in the price for the service, unless a technician is dispatched to perform the LST the day before the scheduled hot cut, BellSouth would be unable to meet a 15-minute interval for cutting over loops.
Given this, BellSouth has a separate benchmark interval for Measure P-7A, Coordinated Customers Conversions – Hot Cut Timeliness % within Interval and Average Interval for hot cuts involving Integrated Digital Loop Carrier ("IDLC") in order to account for the greater time required to coordinate these hot cuts. BellSouth has a benchmark of 95% within a 4-hour window. This allows

RESPONSE (CONT.):

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

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

INTERROGATORY NO. 25: Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number and percent of loops in BellSouth's nine-state region that BellSouth intends to serve via:

(a) DLC loop arrangements; and

(b) NGDLC loop arrangements.

RESPONSE: BellSouth does not develop forecasts by technology type. Forecasts are developed by service type. Current status of the serving arrangements in BellSouth's nine-state region is provided below.

State	Copper	%	Universal DLC	%	Integrated DLC	%	Universal NGDLC	%	Integrated NGDLC	%
AL	1,272,655	64%	210,716	11%	417,795	21%	39,754	2%	51,488	3%
FL	3,396,599	51%	596,945	9%	2,347,424	36%	157,906	2%	100,872	2%
GA	1,826,598	44%	687,657	17%	1,286,512	31%	226,880	5%	104,767	3%
KY	854,806	68%	131,865	11%	199,620	16%	42,914	3%	26,635	2%
LA	1,810,481	76%	246,148	10%	272,920	11%	43,292	2%	24,205	1%
MS	868,943	62%	145,008	10%	336,113	24%	29,868	2%	21,064	2%
NC	1,321,278	52%	270,813	11%	845,471	33%	59,846	2%	43,291	2%
SC	827,067	55%	68,430	5%	604,242	40%	7,742	1%	8,216	1%
TN	1,617,081	59%	282,261	10%	703,448	26%	58,602	2%	59,289	2%
Total	13,795,508	56%	2,639,843	11%	7,013,545	29%	666,804	3%	439,827	2%

INTERROGATORY NO. 26: Please identify the number and percent of hot cut LSRs received by BellSouth in the last 12 months for which data is available that have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system.

(a) If available, provide the information by month and by CO.

(b) Please explain how you calculated or estimated the percentage.

RESPONSE: See file provided by BellSouth in response to AT&T's 1st Production of Documents, Item No. 5 in this Docket, for the percentage of conversions during the last 12 months that have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system From September 2002 until April 2003, the determination of a dispatch was based on the Routing Code used on the service order in SOCS. Starting in May 2003, the OCB field identifier (FID) is used to determine if a dispatch occurs. From September