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February 27, 2004

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's Triennial Review Order (Nine-month Proceeding) (Hot Cuts)*
Docket No. 03-00526

Dear Chairman Tate:

Enclosed are the original and six paper copies and a CD Rom containing BellSouth's rebuttal testimony from the following witnesses:

Ken Ainsworth	Kathy Blake
Alfred Heartley	Milton McElroy
Ronald Pate	Al Varner

Mr. Ainsworth's Exhibit 4 contains proprietary information and is being submitted under separate cover subject to the terms of the Protective Order entered in this docket. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

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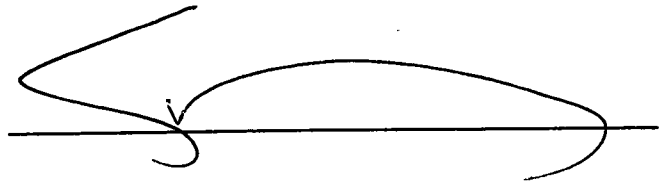

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF KENNETH L. AINSWORTH

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 03-00526

FEBRUARY 27, 2004

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

A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations for BellSouth.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE WITH BELLSOUTH.

A. I have over thirty-five years experience in the telecommunications industry. My experience covers a wide range of network centers as well as outside plant construction Specifically, I have managed and/or supported the following network centers: Switching Control Center, Special Service Center, Central Office Operations, Access Customer Advocate Center, Facility Management Administrative Center, Circuit Order Control Center, Network Operations Center, Major Account Center, 911 Center and the Customer Wholesale Interconnection Network Services Center. In addition, I deployed the Work Force Administration

("WFA") system, which is used by these centers to track the status of certain activities performed by BellSouth's Network personnel. I am currently a Director for Interconnection Services directly supporting the Local Carrier Service Center ("LCSC") and Customer Wholesale Interconnection Services ("CWINS") Centers regarding pre-ordering, ordering, provisioning and maintenance activities for the wholesale market. I have participated in and provided technical assistance to numerous Competitive Local Exchange Carrier ("CLEC") workshops on issues dealing with pre-ordering, ordering, provisioning, and maintenance of resold services and unbundled network elements.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony will demonstrate two main points: (1) BellSouth has in place a proven, seamless, high quality individual hot cut process to handle Unbundled Network Element Loop ("UNE-L") volumes likely to result if BellSouth obtains full relief from unbundled circuit switching; and (2) BellSouth has in place a batch hot cut process that provides additional ordering efficiencies and the same proven, seamless, quality migrations as individual hot cuts to convert the embedded base of Unbundled Network Element Platform ("UNE-P") arrangements to UNE-L arrangements if BellSouth obtains full relief from unbundled circuit switching.

Q. BASED ON THE VOLUME OF TESTIMONY FILED ON THE HOT CUT ISSUE, SHOULD THE TENNESSEE REGULATORY AUTHORITY ("AUTHORITY") INFER THAT A "HOT CUT" IS A DIFFICULT OR CUMBERSOME PROCESS?

A. Absolutely not. A hot cut, simply defined, is moving a jumper from one location to another. The hot cut itself involves basic network functions and skills that are used repeatedly in BellSouth's network every day The extensive number of customers being served in Tennessee by a combination of a BellSouth loop and a CLEC switch demonstrates that BellSouth has a hot cut process that works.

Q. HAS THE AUTHORITY REVIEWED BELLSOUTH'S HOT CUT PROCESS BEFORE?

A. Yes. This portion of the case should be familiar to the Authority. The Authority expended a great deal of time and energy reviewing the ordering and provisioning of hot cuts in BellSouth's 271 case In that case, the Authority found that BellSouth provides CLECs nondiscriminatory access to UNE loops, provided via a hot cut process.

Q WHAT DOES THE TRO OBLIGATE THIS AUTHORITY TO DO WITH RESPECT TO HOT CUTS?

A. The TRO obligates this Authority to establish an incumbent LEC batch hot cut process in this nine-month proceeding. Thus, to comply with the FCC's directive, the Authority must adopt and implement a process by the conclusion of this case

I. BELLSOUTH'S HOT CUT PROCESSES

A. General Overview of BellSouth's Different Hot Cut Processes

Q. GENERALLY, WHAT TYPES OF HOT CUT PROCESSES AND WHAT TYPES OF COORDINATION LEVELS DOES BELLSOUTH OFFER CLECS?

A BellSouth provides three (3) different hot cut processes and three (3) different levels of coordination. Despite this variety of service offerings, however, the actual hot cut remains a simple, straightforward task – and a task BellSouth can perform at high volumes with a high degree of accuracy and speed

Q. WHAT ARE THE THREE (3) DIFFERENT TYPES OF HOT CUT PROCESSES THAT BELLSOUTH CURRENTLY OFFERS?

A. BellSouth offers CLECs the following types of hot cuts: (1) individual hot cuts; (2) project hot cuts; and (3) batch hot cuts.

Q. PLEASE BRIEFLY DESCRIBE THE INDIVIDUAL, PROJECT, AND BATCH HOT CUT PROCESSES.

A. An individual hot cut service request is for a particular end-user account and is available for both residence and business service lines. Service requests for individual accounts may include single or multiple lines. Simply put, the individual account service request will process a single order for a single end-

user

The project hot cut is for cuts involving 15 or more lines to a single end-user. To ensure an efficient cut, BellSouth involves a Customer Care Project Manager ("CCPM") to coordinate the different work functions. The criteria for project hot cuts can be found at http://www interconnection bellsouth.com/guides/html/other_guides.html

The batch hot cut service request (which is interchangeably referred to as the "bulk" migration process) provides efficient processing for large volume migrations of UNE-P service to UNE-L service and is particularly suited to the migration of an embedded base of UNE-P circuits to UNE-L circuits. The batch hot cut process applies to migrations of multiple accounts for the same service type within a specific wire center. The batch process combines ordering efficiencies and project management support with a proven hot cut provisioning process. I have attached BellSouth's UNE-P to UNE-L Bulk Migration CLEC Information Package as Exhibit KLA-1. It can also be found at http://www interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf

Q. PLEASE DESCRIBE THE DIFFERENT LEVELS OF COORDINATION BELLSOUTH OFFERS AND THE PROCESSES TO WHICH THEY APPLY.

A. BellSouth offers CLECs three (3) hot cut coordination levels: (1) coordinated / time specific, (2) coordinated, and (3) non-coordinated.

COORDINATED / TIME SPECIFIC hot cuts require BellSouth to convert the CLEC account on a specific date and at a specific time designated by the CLEC.

When the CLEC elects this option, BellSouth contacts the requesting CLEC 24 to 48 hours prior to the due date to verify that BellSouth's service order information agrees with the CLEC's request. At that time, BellSouth also confirms no jeopardy situation exists (for either the CLEC or for BellSouth), validates the specific conversion time requested, and provides to the CLEC the status of any dial tone test (that is, BellSouth's test of dial tone provided by the CLEC's switch).

On the due date, the CWINS Center contacts the CLEC prior to the established conversion time for a final validation that the migration is still a "go". The BellSouth CWINS technician communicates with the BellSouth's Network groups at the specified conversion time and makes the execution request to perform the hot cut. The CWINS technician stays on the call, awaiting Network completion notification. When the technician in BellSouth's Network group completes the hot cut, that technician notifies the CWINS technician who documents the hot cut completion At this point, the hot cut is complete in BellSouth's network.

Once the hot cut is complete, the CWINS technician attempts to notify the CLEC for acceptance of the order. "Acceptance" means that the CLEC agrees that the order has been fulfilled successfully and that it is appropriate for BellSouth to close the order as complete. Once BellSouth confirms CLEC acceptance, or default acceptance occurs (e.g., BellSouth never hears back from the CLEC), the

pending service orders are completed in BellSouth's systems by the CWINS technician

Coordinated/Time Specific is available for individual and project hot cuts.

COORDINATED hot cuts require BellSouth to convert the CLEC's customer account on a date specified by the CLEC and a best effort time frame negotiated by the parties. For coordinated hot cuts, BellSouth contacts the requesting CLEC 24 to 48 hours prior to the due date to verify that BellSouth's service order information agrees with the CLEC's request. At that time, BellSouth also confirms no jeopardy situation exists (either for the CLEC or for BellSouth) and provides to the CLEC the status of any dial tone test performed (that is, BellSouth's test of dial tone from the CLEC's switch) Finally, during this call, which occurs during the 24 to 48 hours prior to the due date, the parties verify the targeted time frame on the due date that the hot cut will be performed.

On the due date, CWINS will contact the CLEC prior to the conversion time for a final validation that the migration is still a "go". The BellSouth CWINS technician communicates with BellSouth's Network group prior to the conversion being started. Once all BellSouth personnel are in communication, the CWINS technician will make the execution request to perform the hot cut and stays on the call, awaiting Network completion notification. When the Network technician completes the hot cut, that technician notifies the CWINS technician who documents the completion. At this point, the hot cut is complete within BellSouth's network. The CWINS technician then attempts to notify the CLEC for

acceptance: As discussed earlier, acceptance in this sense means that the CLEC agrees that the order has been fulfilled successfully and that is appropriate that BellSouth close the order as complete Once CLEC acceptance is confirmed or default acceptance occurs, the pending service orders are completed by the CWINS technician.

Coordinated service is available on individual, project, and batch hot cuts.

NON-COORDINATED hot cut requests are converted by BellSouth's Network personnel at various times on the due date based on the Network technicians' work load activity and schedule.

Once BellSouth network personnel complete the non-coordinated hot cut, the technician completes the work order that, in turn, generates a notification (either by facsimile or by e-mail) to the CLEC that the conversion is complete. In addition to the facsimile or e-mail option, BellSouth is currently developing a web-based notification tool for batch hot cuts as another alternative for CLEC notification. This application is currently targeted to be made available to the CLECs in June 2004. Exhibit KLA-2 provides specific details and sample screen prints of the information to be contained in this web-based application.

Non-coordinated service is available on individual, project, and batch hot cuts.

Q. PLEASE EXPLAIN THE BENEFITS OF EACH COORDINATION LEVEL.

A. COORDINATED/TIME SPECIFIC hot cuts allow CLECs to schedule conversions at a CLEC-requested time on the due date. This gives the CLEC an opportunity to schedule a specific conversion time with certain end-user customers based on the business needs of the CLEC or the end-user. The coordinated / time specific hot cut is the most detailed of the three (3) types of conversions and, as the Federal Communications Commission ("FCC") held, is not something BellSouth is required to "provide at no charge " *Georgia/Louisiana Order*, ¶ 222.

COORDINATED hot cuts assure the highest level of monitoring and interaction by BellSouth with the CLEC during the provisioning process culminating in direct completion notification at the completion of the conversion activity. The coordinated hot cut allows CLECs the added value of the coordination functions and direct notification and acceptance activities at the conclusion of the conversion. When CLECs desire coordination assurances, direct notification and acceptance opportunities, the coordinated conversion would be a good choice.

NON-COORDINATED hot cuts, as suggested by the name, provide basic hot cut conversion processing without coordination functionality. This is not meant to suggest that BellSouth's provisioning activities are not internally coordinated for this type hot cut, because they are. However, BellSouth does not coordinate its conversion activities with the CLEC at the time of the hot cut. This type of hot cut allows a CLEC to convert its end-user from BellSouth's switch to the CLEC's switch over an unbundled loop (that is, the UNE-L) at the lowest possible cost to the CLEC. Network non-coordinated provisioning functions are still performed by BellSouth's Network personnel to assure a quality conversion. Completion

notification is triggered by service order activity completion by Network personnel, which propagates either a facsimile or e-mail completion notification, and starting in June 2004, as stated above for batch hot cuts, a web-based completion notification (as specified by the CLEC) to the CLEC.

B. BellSouth's Individual Hot Cut Process

Q. HAS THE AUTHORITY REVIEWED BELLSOUTH'S INDIVIDUAL HOT CUT PROCESS BEFORE?

A Absolutely As I mentioned briefly at the outset, this Authority, as well as the FCC, reviewed BellSouth's hot cut process during BellSouth's 271 applications and determined that BellSouth's hot cut process provided CLECs with nondiscriminatory access to unbundled loops. The provisioning process I discuss here entails the same core functions as the process reviewed during the 271 case.

Q. PLEASE EXPLAIN BELLSOUTH'S INDIVIDUAL HOT CUT PROCESS

A. BellSouth has a seamless individual hot cut process that ensures minimal end-user service outage A flow-chart of the individual hot cut process is attached to my testimony as Exhibit KLA-3 BellSouth's process provides for the following:

1. Pre-wiring and pre-testing of all wiring prior to the due date
2 Verification of dial tone from the CLEC's switch

3. Verification of correct telephone number from the BellSouth and CLEC switch using a capability referred to as Automatic Number Announcement ("ANAC")
4. Monitoring of the line prior to actual wire transfer to ensure end-user service is not interrupted
5. Notification to the CLEC that the transfer has completed

In addition to the activities listed above, coordinated hot cuts (including coordinated/time specific hot cuts) also include:

1. Notification to the CLEC of CLEC wiring errors, dial tone, or ANI problems
2. Verification of end-user information with the CLEC prior to the conversion
3. Verification with the CLEC of cut date and or time 24 – 48 hours prior to the conversion date
4. Joint acceptance testing, if requested by the CLEC.

Q. DOES BELLSOUTH CHECK FOR DIAL TONE PRIOR TO A HOT CUT?

A Yes. BellSouth's processes require that a dial tone check be performed prior to a hot cut. Hot cuts involving designed loops are tested for CLEC dial tone 24-48 hours before due date. If no dial tone is found, the CWINS Center technician notifies the CLEC of the problem in order for the CLEC to have time to correct the problem prior to the due date and not jeopardize the hot cut. Coordinated hot cuts involving non-designed loops are tested for CLEC dial tone by the central office ("CO") technician when they perform the pre-wiring for the hot cut If no

dial tone is found, the CO technician places the order in jeopardy and the CWINS technician notifies the CLEC of the problem in order for the CLEC to have time to correct the problem prior to the due date and not jeopardize the hot cut.

For non-coordinated hot cuts, BellSouth checks for dial tone before the due date but currently does not require CLEC notification of a no dial tone problem. BellSouth's CO personnel check for CLEC dial tone when they perform pre-due date wiring functions The CO technician places the order in jeopardy if no CLEC dial tone is present. Upon implementation of the web-based notification tool, which I mentioned earlier, BellSouth will provide the CLECs with notification of a no dial tone problem. As stated earlier, this is currently scheduled for implementation in June 2004. The BellSouth CO technician checks again for CLEC dial tone on due date and if dial tone is present, the CO technician performs the hot cut. If on the due date, there is still no CLEC dial tone, the hot cut does not go forward and the BellSouth technician codes the order as a Missed Appointment ("MA") due to CLEC problems. The CLEC is then notified, (either electronically, if the CLEC placed its Local Service Request ("LSR") electronically, or by fax if the CLEC placed its LSR manually), that the order is in MA status and that the CLEC must either supplement its order for a new due date or cancel its order. Even in non-coordinated cuts, the customer is not taken out of service if there is no dial tone on the receiving end of the cut.

Regardless of which type of hot cut is ordered by the CLEC, BellSouth also performs a check for CLEC dial tone immediately prior to the hot cut to ensure that dial tone is present.

Q. DOES THE HOT CUT PROCESS CAUSE SERVICE DISRUPTIONS? IF SO, DOES THAT MEAN THAT BELLSOUTH'S PROCESS IS NOT SEAMLESS?

A. The very nature of a hot cut is that there is a physical transfer of the loop facility serving the end-user from the existing central office switch (that is, BellSouth's switch) to the CLEC's switch. This physical transfer interrupts dial tone and the end-user's ability to place or receive calls during this process only during the time the loop is disconnected from BellSouth's switch but is not yet connected to the CLEC's switch Due to the pre-conversion work that BellSouth performs before the actual transfer from switch to switch, the average conversion time to make this physical transfer from November 2002 to October 2003 has only averaged 2:48 minutes in Tennessee according to BellSouth Service Quality Measurements ("SQM") reports. This indicates the end-user would be without calling capability for only 2:48 minutes. The CLEC performs required number porting activities once the transfer from BellSouth's switch to the CLEC's switch is effectuated. BellSouth witness Mr. Varner will discuss the specifics of the performance data.

Q. PLEASE ADDRESS HOW THE PROCESS CHANGES WHEN COSMIC FRAMES OR MULTIPLE FRAMES ARE INVOLVED IN THE CUT.

A First, let me explain that the so-called "COSMIC" frame is a newer style modular Main Distributing Frame ("MDF") whose assignment records are housed in a system called SWITCH/FOMS ("Frame Order Management System"). Using a "punch down tool" on this style frame, temporary connections referred to as

"jumpers" are made by punching the jumper wire onto special terminals that strip the insulation and cut off any excess jumper wire in one stroke. This takes less time than for older style frames that required soldered connections or so-called "wire wrapped" connections. Wire wrapped connections required a special tool that wound the jumper wire around a metal terminal once the technician had removed the plastic insulation from the jumper wire. SWITCH/FOMS also contains assignment algorithms meant to minimize the length of jumpers connecting loops and switch ports thereby reducing work times required to place jumpers. Thus, work times to complete required activities for an unbundled loop order and the number of wiring connections that have to be made in the CO vary depending on the frame type and/or the location of the demarcation point in a particular CO between BellSouth's network and the CLEC's collocation arrangement The location of the demarcation influences work times because the placement of the demarcation affects the total quantity of jumpers that BellSouth's technicians must place to effectuate the transfer of an unbundled loop. Non-designed loops can require from 1 to 3 jumpers to make the connection from the CLEC demarcation point to the loops appearance on the MDF while designed loops can require from 2 to 6 jumpers to make this connection. Regardless of the arrangement, all of the jumpers are installed prior to the actual hot cut occurring.

Q. HOW IS A CLEC NOTIFIED THAT BELLSOUTH HAS COMPLETED ITS PORTION OF THE HOT CUT AND THAT THE CLEC SHOULD COMMENCE ACTIVITIES TO PORT THE TELEPHONE NUMBER FROM BELLSOUTH'S NETWORK TO THE CLEC'S NETWORK?

A. For coordinated hot cut conversions, the CLEC is directly notified by a telephone call from CWINS Center personnel. This notification occurs after the conversion is complete and has actually taken place. For the BellSouth region from October 2002 to September 2003, BellSouth averaged 1·43 minutes to notify the CLEC to port the number after the conversions were completed. Exhibit KLA-5 sets forth the notification times for this period.

For non-coordinated conversions, BellSouth notifies the CLEC via facsimile or e-mail (whichever the CLEC requests) at the completion of BellSouth's Network technician's work activity. As I stated earlier, BellSouth is also implementing a web-based notification tool for non-coordinated hot cuts. Remember, however, that non-coordinated hot cuts only are an option for the CLEC for whom economics are of the utmost importance. For CLECs who want virtually real-time notification, BellSouth provides that option as well

Q. WHEN DOES CLEC ACCEPTANCE OCCUR IN THE COORDINATED HOT CUT PROCESS?

A. Once BellSouth confirms CLEC acceptance, the BellSouth CWINS technician completes the pending service orders in BellSouth's systems. The service order also is completed in BellSouth's system if a default acceptance condition occurs. Specifically, if the CLEC is notified before 3:00 p.m. that the hot cut is complete, the CLEC has until 6:00 P.M to accept. If the CLEC is notified of completion after 3:00 P.M., the CLEC has until 12:00 P M. of the next business day to accept the hot-cut. If the hot-cut is not accepted within these timeframes, the orders are

closed by default acceptance.

Q. DOES THE HOT CUT PROCESS HAVE ANY NEGATIVE IMPACT ON E911, NUMBER PORTABILITY ADMINISTRATION CENTER ("NPAC"), PROVISIONING, REPAIR, BILLING, OR OTHER DATABASES?

A. No. Updates to the E911 database are triggered by disconnect orders closed in Service Order Communication System ("SOCS"). These same disconnect completions, along with the completion of all related orders, update all customer service records in the downstream systems including the provisioning, repair and billing information databases. BellSouth's process has no negative impact on the NPAC database. Once the conversion orders are issued, BellSouth places a concur message in the Local Number Portability ("LNP") gateway awaiting the CLECs' subscription to create the port. Once the gateway receives the create message from the CLEC, BellSouth will return the concur message that is already pending in the gateway. This process allows the CLEC to activate the port on the agreed upon date.

Q IS BELLSOUTH'S INDIVIDUAL HOT CUT PROCESS EFFECTIVE?

A. Yes. This Authority and the FCC confirmed the effectiveness of BellSouth's hot cut process during BellSouth's Section 271 Application approval process. This Authority, eight other state commissions, and the FCC all found BellSouth's hot cut process nondiscriminatory, timely, accurate, and effective. Further, BellSouth's hot cut process was reviewed as part of the third party testing

performed by KPMG. That testing confirmed that BellSouth adhered to its process.

Q. HAS THE HOT CUT PROVISIONING PROCESS BEEN REVIEWED RECENTLY?

A Yes. The most recent review of the hot cut provisioning process was done during the Florida Operational Support System ("OSS") Third Party Test. BearingPoint, formerly KPMG Consulting, did review the hot cut provisioning process during the Florida Test. They assessed it from a process standpoint in the PPR-9 Test Report Section which can be found beginning on page 423 of the Florida Test Final Report. Additionally, they observed live hot cuts both from a BellSouth and a CLEC perspective in the TVV-4 Test Report which can be found beginning on page 448 of the Florida Test Final Report. The evaluation criteria or test points for the hot cut observations can be found beginning on page 458 of the report.

Q. WHAT WERE THE FINDINGS OF THE FLORIDA TEST FINAL REPORT?

A. BearingPoint determined that BellSouth had an adequate and effective loop conversion or hot cut process. They found and reported on page 448 that

"Loop Conversions (also referred to as Loop Migrations or Hot Cuts) – Existing BellSouth lines are migrated to the ALEC collocation facility inside a BellSouth central office. BellSouth frame technicians migrate the lines at the main

distribution frame (MDF) on the due date. The conversion is expected to occur on the Frame Due Date for non-coordinated conversions. During coordinated conversions, the cut occurs on the Frame Due Date and starts at the Frame Due Time (FDT) as indicated on the LSR. Cases involving Integrated Loop Carrier (IDLC) migrations require outside technicians to perform field work on the due date and time."

To establish that this process was adequate to migrate CLEC customers, BearingPoint observed live hot cuts. For many of hot cut observations, CLECs conducting business in Florida allowed BearingPoint to observe commercial installations of their orders Data was also gathered during field inspections of hot cut activities in BellSouth central offices and from the CWINS Center. This data was logged and analyzed to determine if BellSouth's hot cut process along with its methods and procedures were adequate for the migration of customers from a BellSouth switch to a CLEC switch.

Beginning on page 458 of the Florida Test Final Report, BearingPoint listed their specific test points or evaluation criteria. First, they assessed whether the BellSouth technicians provisioned hot cuts in accordance with documented methods and procedures. BearingPoint observed live hot cuts and determined that the BellSouth technicians satisfactorily provisioned the hot cuts in accordance with BellSouth documented methods and procedures. Second, BearingPoint assessed BellSouth's performance from an SQM perspective. To achieve this, BearingPoint evaluated Bellsouth's ability to meet the coordinated customer conversion interval performance benchmark which is the P-7 SQM.

Additionally, BearingPoint assessed the P-7A SQM metric for Coordinated Customer Conversions, the P-3 SQM metric for Percent Missed Installation Appointments, the P-9 SQM metric for Percentage Troubles received within 30 Days of Service Order Completion, and the P-7C SQM metric for Percent Provisioning Troubles Received Within Seven Days of a Completed Service Order. For each measure, BearingPoint found that BellSouth indeed exceeded the benchmark or parity standard for the observations that they assessed during the test period. At the end of the testing, BearingPoint was able to confirm the adequacy and effectiveness of BellSouth's hot cut process by rating each of the test points or evaluation criteria as satisfied. This satisfactory rating provides an endorsement for BellSouth's hot cut process.

Q. IS THERE COMMERCIAL USAGE OF BELLSOUTH'S INDIVIDUAL HOT CUT PROCESS?

A. Certainly As the FCC has repeatedly held, the most probative evidence of the availability of a functionality is actual commercial usage. *Bell Atlantic New York Order,* at ¶ 89. BellSouth performed over 300,000 hot cuts between November 2000 and September 2003. Recently, in Florida, BellSouth converted over 260 lines for a single CLEC in one (1) central office on a single day. On the same day, BellSouth converted a total of over 975 lines in ten (10) central offices in the same general area for the same CLEC This level of commercial usage alone demonstrates BellSouth's ability to perform hot cuts at existing and foreseeable volumes

Q. HOW IS BELLSOUTH'S PERFORMANCE ON COORDINATED HOT CUTS?

A. Superior. BellSouth witness Alphonso Varner discusses BellSouth's performance in detail, but I can tell you that BellSouth has performed at a very high level of consistency and quality in regards to hot cuts. For the period November 2002 through October 2003, BellSouth performed 2,505 coordinated hot cuts in Tennessee. Of these, 99.6% of the hot cuts were completed within 15 minutes.

Q. THE FCC INDICATED THAT NEITHER THE STATE'S NOR FCC'S 271 APPROVAL IS APPLICABLE TO A SITUATION IN WHICH CLECS WILL NOT HAVE UNBUNDLED CIRCUIT SWITCHING OR UNE-P. DO YOU AGREE?

A. No. This Authority reviewed BellSouth's hot cut process and determined that it provided CLECs non-discriminatory access to UNE loops The fact that volumes of UNE loops may increase does not change the fact that BellSouth's process is nondiscriminatory and complies with all of BellSouth's obligations under the Act as this Authority and the FCC confirmed. The Authority does not need to revisit the process -- rather, if the Authority confirms that, as BellSouth witness Mr Heartley and I demonstrate, BellSouth's process is fully scalable to meet forecasted demands, then the process is compliant.

C. BellSouth's Project Hot Cut Process

Q PLEASE DESCRIBE BELLSOUTH'S PROJECT HOT CUT PROCESS.

A. Project conversions are available when the CLEC seeks to convert 15 or more lines to the same end-user. When the CLEC requests a project conversion for fifteen or more loops to be provisioned on a single individual order, a CWINS Center technician and a CCPM are assigned to the order and the order is identified in the WFA system for Due Date tracking. The CWINS Center technician or CCPM reviews the order for accuracy and queries associated systems for order status. The CWINS Center technician or CCPM contacts the CLEC prior to the due date to confirm or negotiate the actual due date conversion time. The CWINS Center technician or CCPM then contacts any associated work group to schedule the conversion.

On the Due Date, the CWINS technician verifies that the required personnel are scheduled for the conversion time. The CWINS Center technician sets up communications with required conversion personnel to begin service cutover to the CLEC. Upon completion of the cutover activity, the CLEC is notified With CLEC concurrence, the service order is completed.

The CWINS Center technician completes the order in BellSouth's systems after concurrence of the CLEC. Any trouble conditions, made known by the CLEC, related to the conversion are resolved with the CLEC before the order is closed.

Q. IS THE PROVISIONING PROCESS FOR PROJECT HOT CUTS THE SAME AS FOR INDIVIDUAL HOT CUTS?

A Yes. The "*Project Manager Implementation Guidelines*" posted on the Guides

website http //www interconnection bellsouth.com/guides/html/other_guides.html, provides product-specific information.

D. BellSouth's Batch Hot Cut Process

Q. PLEASE DESCRIBE BELLSOUTH'S BATCH HOT CUT PROCESS.

A. BellSouth's "UNE-P to UNE-L Bulk Migration" is a batch hot cut process that CLECs may use when migrating existing multiple non-complex UNE-P services to a UNE-L offering. This is the process the Authority should adopt in this nine-month proceeding. The batch hot cut process offers electronic ordering capability and adds project-management services to the basic proven hot cut provisioning process.

With respect to electronic ordering, CLECs can submit the Bulk Migration Request electronically, which allows the migration of multiple UNE-Ps to a UNE-L offering without submitting individual LSRs. BellSouth witness Mr. Pate describes this ordering mechanism in his direct testimony. I will address the project management services that are included in BellSouth's batch hot cut process in greater detail below.

Q. HOW DOES THE BATCH MIGRATION PROCESS WORK?

A. During the pre-ordering process, the CLEC submits a Notification Form to BellSouth's CCPM for UNE-P accounts to be converted to UNE-L within a single

wire center. The CCPM reviews the Notification Form for errors and assigns a Bulk Order Project Identifier ("BOPI") and forwards the Notification Form to the Network Single Point of Contact ("SPOC") who assigns due dates to accounts and returns the Notification Form to the CCPM, who then returns the Notification Form to the CLEC.

Additionally, BellSouth is currently developing a web-based scheduling tool that will allow the CLECs to schedule the due dates for their orders prior to submitting their bulk request. This will remove the involvement of the CCPM and the Notification Form from the pre-ordering process. This application is currently targeted to be made available to the CLECs in October 2004. Exhibit KLA-6 provides some specific details of this web-based application.

Q. DURING THE PRE-ORDERING PROCESS, ARE THERE SPECIFIC INTERVALS FOR THE RETURN OF THE NOTIFICATION FORM TO THE CLEC?

A. Yes. Those intervals are as follows:

- Up to 99 Telephone Numbers, 4 business days
- 100 – 199 Telephone Numbers, 7 business days
- 200 or more Telephone Numbers, the CCPM will negotiate with SPOC
- Multiple Batch Requests from multiple CLECs may be submitted simultaneously
- Maximum Telephone Numbers per Batch Request is 99X25=2475

As I stated previously, the implementation of the web-based scheduler will remove this part of the process and the associated intervals

Q WHEN IS THE FIRST DUE DATE ASSIGNED?

A The first due date to be assigned by the SPOC will be a minimum of 17 business days after the Notification Form is returned to the CLEC. In other words, there are three (3) days for the CLEC to submit a clean bulk LSR into their electronic system and then there is a minimum of 14 days after the LSR is submitted to the first service order due date. Further, BellSouth has agreed to shorten the 14-business day minimum to 8 days in a systems release currently scheduled for July of this year. This, in addition to removing the pre-ordering intervals, will significantly reduce the overall interval for batch hot cuts.

The ordering activity is such that the LCSC will use its normal process to handle orders that fall out for manual or partial handling.

Q. PLEASE DESCRIBE THE ROLE THE CCPM PLAYS IN THE BATCH MIGRATION PROCESS AND THE EFFICIENCIES GAINED FROM PROJECT-MANAGEMENT.

A. The role of the CCPM in the batch migration process is to be the SPOC as the liaison between the CLEC and network operations. They coordinate due dates, time frames, after hour scheduling, account coordination, advise of potential delays or problems, and advise of completion of the project. In the batch hot cut

provisioning process, the BellSouth CCPM provides CWINS and the network operations group with notification of planned bulk activity, monitors status of the order(s), interfaces with the CLEC and BellSouth groups during the process, and tracks orders and the project until it is complete.

The CCPM is the party responsible in the first instance for ensuring successful completion of the process.

Q. PLEASE DESCRIBE THE PROVISIONING PROCESS IN THE BATCH MIGRATION PROCESS.

A. The batch hot cut provisioning wire work process has the same core functions as the individual hot cut provisioning process. The benefits of this are obvious – the CLEC is afforded access to the same nondiscriminatory, 271-compliant process that this Authority has already approved.

Q. WILL BELLSOUTH PROVIDE THE CLEC A WINDOW OF TIME WITHIN WHICH BATCH HOT CUTS WILL BE COMPLETED?

A. Yes. BellSouth has recently enhanced the batch process to guarantee a four (4) hour time window for coordinated cuts in the batch process.

BellSouth will also include after hours and Saturday cuts in the batch process As with all special projects, this work could be subject to overtime billing as specified in the parties' interconnection agreement.

Q. IS THE BATCH HOT CUT PROCESS MORE EFFICIENT FOR THE CONVERSION OF AN EMBEDDED BASE OF UNE-P ORDERS TO UNE-L ORDERS?

A. Yes, because it was designed specifically to handle large conversions of UNE-P to UNE-L such as will be accomplished in the conversion of the embedded base.

Q. IS THERE COMMERCIAL USAGE OF BELLSOUTH'S BATCH HOT CUT PROCESS?

A. Yes. Since bulk migration has been made available, there has been limited activity requested by the CLECs However, at the time of this filing, four (4) bulk migration requests have been successfully ordered and completed.

Q. IN ADDITION TO OPERATIONAL EFFICIENCIES, ARE THERE RATE ADVANTAGES TO THE BATCH PROCESS?

A. Yes. The rate for the batch hot cut is discussed in the testimony of BellSouth witness Kathy Blake.

Q. DOES BELLSOUTH'S BATCH HOT CUT PROCESS INCLUDE LOOPS SERVED BY INTEGRATED DIGITAL LOOP CARRIER ("IDLC")?

A. Yes IDLC is a special version of DLC that does not require a host terminal in the central office, sometimes referred to as the COT, but instead terminates the

digital transmission facilities directly into the central office switch In its Texas 271 Decision, the FCC found that "the BOC must provide competitors with access to unbundled loops regardless of whether the BOC uses integrated digital loop carrier (IDLC) technology or similar remote concentration devices for the particular loops sought by the competitor." Memorandum Opinion and Order, *Application by SBC Communications Inc., et al., Pursuant to Section 271 of Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, 15 FCC Rcd 18354, ¶ 248 (2000) ("*Texas Order*"). BellSouth provides access to such IDLC loops via the following methods:

- Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair.
- Alternative 2: Where the loops are served by Next Generation Digital Loop Carrier ("NGDLC") systems, BellSouth will "groom" the integrated loops to form a virtual Remote Terminal ("RT") arranged for universal service (that is, a terminal which can accommodate both switched and private line circuits). "Grooming" is the process of arranging certain loops (in the input stage of the NGDLC) in such a way that discrete groups of multiplexed loops may be assigned to transmission facilities (in the output stage of the NGDLC) Both of the NGDLC systems currently approved for use in BellSouth's network have "grooming" capabilities.
- Alternative 3: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic loop feeder pair (copper pair) or to spare universal digital loop carrier equipment in the loop feeder route or Carrier Serving Area ("CSA"). For two-wire Integrated Services Digital Network ("ISDN") loops, the Universal Digital Loop Carrier

("UDLC") facilities will be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment.

- Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access ("INA") systems or other existing IDLC that terminates on Digital Cross-connect System ("DCS") equipment. BellSouth will thereby route the requested unbundled loop channel to a channel bank where it can be de-multiplexed for delivery to the requesting CLEC or for termination in a DLC channel bank in the central office for concentration and subsequent delivery to the requesting CLEC.
- Alternative 5: When IDLC terminates at a switch peripheral that is capable of serving "side-door/hairpin" capabilities, BellSouth will utilize this switch functionality. The loop will remain terminated directly into the switch while the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting CLEC.
- Alternative 6: If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door capable.
- Alternative 7: BellSouth will install and activate new UDLC facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area In the case of NGDLC, if channel banks are available for growth in the CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC

systems.

- Alternative 8: When it is expected that growth will not create the need for additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC

The eight (8) alternatives for giving a CLEC access to loops served by IDLC listed above are listed in order of complexity, time, and cost to implement. The simplest is listed first and the most complex, lengthy, and costly to implement listed last. Also, Alternative 1 and the copper loop solution of Alternative 3 do not add additional Analog to Digital conversions. When a CLEC orders a loop, BellSouth delivers that loop to the specifications ordered by the CLEC. Thus, ordinarily BellSouth chooses the method for delivering the loop meeting the ordered specification without involving the CLEC.

Q. WHAT HAPPENS IF ONLY ALTERNATIVES 7 OR 8 ARE AVAILABLE?

A. In that scenario, which BellSouth anticipates occurring very infrequently, BellSouth will provide the CLEC two (2) choices – the CLEC may pay special construction charges to build the necessary facilities, or BellSouth will provide the CLEC a UNE-P at the Total Element Long-Run Incremental Cost ("TELRIC") rate. BellSouth only will make the second of these options available in those areas in which it receives relief from unbundled switching

Q. HAS THIS AUTHORITY REVIEWED THESE EIGHT (8) ALTERNATIVES PREVIOUSLY?

A Yes. All nine of BellSouth's states and the FCC considered and approved these eight (8) alternatives for providing unbundled loops served via IDLC during BellSouth's Section 271 applications

II. SCALABILITY OF BELLSOUTH'S HOT CUT PROCESSES

Q IS BELLSOUTH'S INDIVIDUAL AND/OR BATCH HOT CUT PROCESS SCALABLE TO MEET LOAD DEMAND THAT MIGHT RESULT IF BELLSOUTH RECEIVES UNBUNDLED SWITCHING RELIEF?

A. Absolutely. BellSouth's systems and processes are scalable and the capacity of those systems and processes may be readily increased as demand warrants. I will address the scalability of the centers involved in the hot cut process, while BellSouth witnesses Pate and Heartley address the scalability of the OSS and network forces, respectively.

BellSouth's performance measurements demonstrate that BellSouth's LCSC and CWINS organizations are staffed sufficiently to handle the current volumes of unbundled loop orders. They also establish that BellSouth has scaled its resources as necessary to handle changes in volumes of such orders over the years. More fundamentally, the outstanding performance of the LCSC and CWINS in handling both steady growth and spikes in demand makes clear that BellSouth will continue to staff its LCSC and CWINS organizations sufficiently to handle any reasonably foreseeable demand for hot cut conversions.

Finally, BellSouth has a strong incentive to ensure that the LCSC and CWINS are adequately staffed to meet demand for all order types, including hot cut loops in that BellSouth remains subject to penalties and voluntary payments under its Self Effectuating Enforcement Measurements ("SEEMs") plan for performance failures

Q. FOR WHAT VOLUME LEVELS ARE THE CENTERS CURRENTLY STAFFED?

A. Current staffing of the LCSC and CWINS were predicated on expectation of higher UNE loop conversion volumes than currently exist. There are three (3) dedicated LCSCs (located in Atlanta, Georgia, Birmingham, Alabama and Fleming Island, Florida) serving the CLEC community for preordering and ordering. Further, there are two (2) dedicated CWINS operational centers (located in Birmingham and Fleming Island) to perform hot cut coordination, when required. These operational groups have currently redirected resources due to lower than expected UNE conversion volumes. That means these operational groups have the available capacity to reallocate these personnel at such time that the UNE conversion volumes increase.

Q CAN CENTERS PERSONNEL BE REALLOCATED AS PRODUCT DEMAND CHANGES WITHOUT ADDITIONAL STAFFING?

A. Yes. The LCSC and CWINS personnel provide support across the entire range of wholesale products and services BellSouth makes available. Any increase in hot cut volumes resulting from the absence of UNE switching presumably would

be accompanied by a decrease in order types that rely on UNE switching (i.e., UNE-P), such that the resources currently dedicated to one could then be devoted to the other. Initially, LCSC service reps are hired and trained in a single product type, for example, residential resale or simple business resale or UNE-P. As service representatives become more proficient with their initial discipline, additional training to handle other types of order requests is provided. With this cross training, many LCSC service representatives are able to handle multiple types of service order requests thus enabling the LCSC organization to move service representatives from one function to another CWINS employees complete various levels of technical classroom training, in addition to receiving CWINS-specific training on the CLEC products or functions they are assigned to support CWINS employees therefore are capable of handling provisioning, maintenance, and repair functions for a variety of wholesale products with minimal additional on-the-job training. The CWINS reallocates its employees among products as necessary to handle shift in demand.

Q. IF UNBUNDLED CIRCUIT SWITCHING IS ELIMINATED IN CERTAIN AREAS, HOW WILL BELLSOUTH MEET THE DEMAND?

A. The LCSC and CWINS organizations use sophisticated force models to ensure that their operations are adequately staffed to meet anticipated CLEC demand. BellSouth's sustained level of performance for both UNE loops and hot cuts validates that the current force models have been successful in meeting CLEC service order demand with quality and reliability.

Q. DID BELLSOUTH DO A FORCE MODEL TO ANTICIPATE STAFFING NEEDS ASSUMING THE ELIMINATION OF UNBUNDLED CIRCUIT SWITCHING?

A. Yes. Using an estimated volume of UNE-L orders that I will discuss later, BellSouth ran the center's force model to determine anticipated staffing needs assuming a worst case scenario. See Exhibit KLA-4, attached to this testimony, for model details.

Q. DOES BELLSOUTH OBTAIN CLEC FORECASTS TO ASSIST IN SCALING ITS WORK FORCE?

A. BellSouth attempts to obtain such forecasts. Accurate and timely CLEC forecasts help BellSouth plan for future hot cut volumes, but are not required for the operation of its force models. CLECs are requested to provide a forecasted number of unbundled loops a minimum of 30 days prior to submitting their first unbundled loop order. After CLECs order their first unbundled loop, BellSouth requests six-month interval forecasts by unbundled loop type and wire center Accurate and timely forecast information is helpful in assisting BellSouth meet projected hot cut volumes; however, BellSouth force models are not dependent upon receipt of such forecasts because CLECs generally do not provide such forecasts.

Rather, as noted above, the force models automatically factor demand projections based on historical trends into LCSC/CWINS staffing requirements. BellSouth makes adjustments, as necessary, to handle sudden increases in

volume – and undertakes hiring initiatives as soon as it becomes apparent that additional resources will be necessary to handle anticipated future demand. Nonetheless, CLECs could help BellSouth anticipate and fulfill future staffing needs by providing timely and accurate forecasts, especially for substantial increases in volumes

Q. WHAT DO YOU MEAN BY "WORST CASE" SCENARIO?

A. I am not using the term "worst case" in a negative or judgmental manner Rather, I am using it simply to refer to the maximum amount of hot cuts that the LCSCs and CWINS Centers would reasonably be expected to handle if the following were to occur:

1. This Authority finds that CLECs are not impaired without unbundled switching (and thus, UNE-Ps) in any market in BellSouth's nine-state region.
2 CLECs decide to convert the totality of their UNE-P base to unbundled loops attached to the CLECs' switches rather than BellSouth's switches.
3. UNE-P growth and UNE-L growth is maintained throughout the relevant period for the absolute highest volumes of each that has occurred at any time in the last 37 months.

Q. WHAT MONTHLY VOLUME OF UNE-P TO UNE-L CONVERSIONS RESULTS FROM YOUR ASSUMPTIONS?

A. The "worst case" monthly volume of hot cuts (except for adjustments to that volume that I will discuss later in this testimony) is 317,998 across the entirety of

BellSouth's nine-state region. The following explains how I arrived at that value

The highest single-month volume of UNE-Ps added (116,295) occurred in June 2002. The highest single-month volume of UNE-Ls added (19,029) occurred in January 2001 These "highest ever" volumes were assumed as monthly growth going forward. The pictorial in Exhibit KLA-7, which is attached to this testimony, depicts how those volumes grow over time.

Following is a brief explanation:

In October 2003, there were about 2.21million UNE-Ps in service region-wide. Projecting forward for nine (9) months to July 2004 (the earliest expected decision by a Public Service Commission in BellSouth's region), there would be 3.26 million UNE-Ps in service (2.21M + (9 * 116,295). However, because the conversion of a BellSouth retail account to a UNE-P arrangement does not require a hot cut, the monthly volume expected in July 2004 is equal to the quantity of "stand-alone" unbundled loops requested (19,029).

Assuming that in July 2004, all nine Commissions in BellSouth's region decided that CLECs are not impaired without unbundled switching and that CLECs may continue to request UNE-Ps for an additional five (5) months, the expected quantity of UNE-Ps in service in December 2004 would be 3 84 million. This level of UNE-Ps becomes the "embedded base" which later will be converted to stand-alone unbundled loops via the hot cut process. For the next eight (8) months, the monthly volume of hot cuts would rise to 135,324 This is the sum of the "worst case" unbundled loop volume (19,029) plus the "worst case" monthly

growth for UNE-Ps (116,295).

Beginning in August 2005, BellSouth would begin the transition of the embedded base of UNE-Ps (3.84 million) plus handle the "worst case" monthly unbundled loop volume (19,029) and the "worst case" monthly UNE-P growth volume (116,295). During each of the subsequent seven-month intervals, BellSouth would migrate one third of the embedded base. Thus, the "worst case" monthly hot cut volume at the region level would be 317,998 (that is, 19,029 + 116,295 + ((3.84M * 0.333)/7))

Because on average there are 22 3 business days per month, the daily volume becomes 14,260 (that is, 317,998 / 22 3) at the regional level.

Q. WHAT OTHER ADJUSTMENTS TO ANTICIPATED VOLUMES HAVE YOU ASSUMED?

A. During CLEC workshops, CLECs have suggested that two adjustments should be made to increase the anticipated volume of hot cuts by including: (1) some level of "churn" from one local carrier to another; and (2) increased trouble reports for unbundled loops compared to UNE-P arrangements While I do not necessarily agree with the CLECs' suggestions, I have included those adjustments to prove my point that BellSouth can expand its LCSC and CWINS groups to handle hot cut volumes even when these additional factors are taken into account. . Accordingly, I made an upward adjustment of 4% churn per month (48%) per year and an upward adjustment of 5% increased trouble report

rate. I treated these adjustments as if they resulted in additional hot cuts (again, a "worst case" assumption) and the resultant monthly volume for hot cuts rose to 347,254 per month (15,572 per business day).

Q. WHAT ARE THE CENTERS' INPUTS TO THE FORCE MODEL?

A. In order to ensure adequate staffing of the centers supporting CLECs, BellSouth utilizes a work force model to anticipate staffing needs based on historical trends, time and motion studies, internal forecasts and targeted benchmarks. The work force model provides a means to assure adequate staffing of BellSouth's LCSC and CWINS operations. The models utilize a forward-looking view of activity by product type, which allows BellSouth sufficient time to hire and train personnel in anticipation of any increase in activity. The force model has proved reliable It allowed BellSouth staff to meet tighter benchmarks for Firm Order Confirmations ("FOCs") and rejects for partially mechanized orders. BellSouth has clearly demonstrated, through its performance data, that the infrastructure to handle increasing levels of orders is in place and functioning at a very high level.

Q. WHAT ARE THE CENTERS' STAFFING REQUIREMENTS FROM THE MODEL?

A. Using daily volumes for Tennessee (9% of all the UNE-Ps in BellSouth's region) means that BellSouth would have to hire and train 132 technicians in the CWINS Centers and 32 service representatives in the LCSCs. Again, we have assumed a worst-case scenario for the CWINS Centers that 50% of the migrations would

be coordinated and thus would require CWINS involvement. BellSouth expects the number of coordinated migrations to be much less than this.

Q HOW CAN THE CENTERS MEET THESE PROJECTED STAFFING LEVELS?

A Force and load management is something BellSouth has been doing for decades BellSouth would hire the additional force by engaging its Human Resources Department. Human Resources would advertise the jobs in local media and conduct job fairs and testing events to screen applicants. Human Resources would require 90 days from notification to employees being added to the payroll.

Q. HAS BELLSOUTH EVER HIRED CENTER PERSONNEL IN SUCH VOLUMES BEFORE?

A Yes. During the time period 1998-2001, BellSouth hired and trained approximately 2,000 service representatives and technicians for its Wholesale operations.

Q. DOES BELLSOUTH HAVE TO HIRE ALL OF THESE PEOPLE AT ONCE?

A. No. The beginning of the transition period for the embedded base of UNE-Ps in the Order is eighteen months away (August 2005) as shown in Exhibit KLA-7, so BellSouth has an extended period of which to add force if needed.

Q ARE THESE FORECASTED VOLUMES REALISTIC?

A. No. First, as other BellSouth witnesses describe, BellSouth only is seeking elimination of unbundled circuit switching in certain areas of the state. Thus, BellSouth's assumption of UNE-L orders is high in that unbundled UNE-P will continue to be available in some areas of the state. Second, whenever it had a choice, BellSouth used the highest volume value available – highest UNE-Ps in a month etc. The point, however, is that if BellSouth can scale its forces to meet the most unrealistic demand, it certainly can scale its forces to meet a more realistic demand.

III. REGIONALITY OF BELLSOUTH'S PROCESSES

Q. ARE BELLSOUTH'S HOT CUT PROCESSES REGIONAL?

A. Yes. In the 271 cases, state commissions and the FCC held that BellSouth's OSS (pre-ordering, ordering, provisioning, maintenance and repair, and billing) are regional. For example, in the FCC's Five-state Order, (WC Docket No. 02-260, ¶130) the FCC held "We find that BellSouth, through the Pricewaterhouse Coopers (PwC) report, provides evidence that its OSS in Georgia are substantially the same as the OSS in each of the five states."

Further, in CC Docket No. 02-35 (GA/LA Order) at ¶111, the FCC held that "[t]he record indicates . BellSouth has provided detailed information regarding the "sameness" of BellSouth's systems in Georgia and Louisiana, including their

manual systems and the way in which BellSouth personnel do their jobs. Accordingly, we find that BellSouth, through the PwC audit and its attestation examination, provides evidence that its OSS in Georgia are substantially the same as the OSS in Louisiana. We shall consider BellSouth's commercial OSS performance in Georgia and the Georgia third-party test to support the Louisiana application and rely on Louisiana performance to support the Georgia application."

Q. DOES BELLSOUTH PERFORM ITS HOT CUT PROCESSES THE SAME WAY IN ALL NINE OF ITS STATES?

A. Yes it does.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

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

CLEC Information Package

Version 2
February 18, 2004

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. Revisions

1) Following are the revisions in section 5 "Bulk Migration Options" that are enhancements to the Bulk Migration process as referenced in Carrier Notification Letter SN91083967

- After Hours/Weekend Migrations
- Two-Hour Go Ahead Notifications for SL1 non-coordinated migrations
- Time Windows for coordinated conversions
- Pre and Post order completion restoral process (Throwback)
- Same-Day end-user account migration
- CLEC to CLEC migration (UNE-P to UNE-L)

2) Additional revisions include interval reductions in the table in section 10.1 "**Bulk Migration Project Notification Interval**"

- For a "Maximum of 99" telephone numbers the CCPM interval has been reduced from 7 business days to 4 business days
- For "100-200" telephone numbers, the CCPM interval has been reduced from 10 business days to 6 business days

UNE-P to UNE-L Bulk Migration

3. 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 Customer Care Project Manager (CCPM) 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

3.1 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

3.2 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

4. Bulk Migration 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 on Due Date –7 days, 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 Customer Care Project Manager (CCPM) 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 CCPM prior to the CLEC's placing the mechanized Bulk Request.
- CLEC may specify Desired Due Dates (DDD) for each EATN The BellSouth CCPM will negotiate due dates with Network Operations Every effort will be made to accommodate the CLEC DDDs where force and load permits and minimum intervals are met
- 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

CCPM

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

5. Bulk Migration Options

5.1 Order Coordination (Coordinated Hot Cut)

- Order Coordination (OC) is available in situations where there is a reuse of existing facilities for the UNE-L
- OC is included with the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops at no additional charge.
- OC is available as a chargeable option for conversions to UVL-SL1, UCL-Non Designed 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.

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.2 After Hours/Weekend Migrations

- Migrations will typically be completed during normal working hours of 8 a m – 5 p.m. However, for CLECs that have customers who need cutovers completed outside of normal business hours, after hours/weekend migrations are available at the CLECs request.
- The Project Notification Form includes a column titled "Special Handling" The CLEC provides its desired "Day" and "After Hours/Weekend" time window for the selected accounts at the EATN level in the Special Handling column according to the table below

Days	After-hours Time-Windows	Minimum Lines	Maximum Lines	Special Considerations	Add'l charges
Mon – Fri [1]	7 a m – 8 a m	10	25	NA	Per CLEC's IA[3]
Mon – Fri [1]	5 p m – 7 p m	10	50	NA	Per CLEC's IA[3]
Saturday [1]	8 a m – 5 p m	50	100	UVL-SL1 Non-Coordinated only	Per CLEC's IA[3]
Mon-Fri [2]	7 p m – 12 midnight 6 a m – 7 a m	Individual Case Basis	Individual Case Basis	CO work only – no outside dispatches	Yes Overtime

[1] Extended Basic Hours
[2] Extended Overtime Hours
[3] Interconnection Agreement

5.3 Two (2) hour Go Ahead Notification *(for Non-Coordinated Bulk Migrations)*

- For ***non-coordinated*** non-designed migrations, the CLEC will be notified within a maximum of two (2) hours of the cutover.
- A Go Ahead Notification will be sent to the CLEC by facsimile* or email for UVL-SL1 and UCL-ND non-coordinated migrations.
- Once the CLEC is notified of the cutover completion, the CLEC can then complete the necessary number porting activities.

***Note** To change from fax to email notification, the CLEC should contact its BellSouth Local Contract Manager (LCM) and provide its Alternate Exchange Carrier Number (AECN) and email address.

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.4 Time Windows for Coordinated Conversions

Time Windows for Coordinated Conversions are available for bulk migration orders at the CLEC's request as follows

- There are two (2) time window options
  - *8 a.m. – 12 p.m*
  - *1 p m. – 5 p m*
- CLEC will submit the Project Notification form and indicate the time window desired, at the EATN level, in the Special Handling column.
- Prior to the due date, the BellSouth CCPM will coordinate with Customer Wholesale Interconnection Network Services (CWINS) to ensure that CWINS and Network forces are scheduled and loaded to perform the migration in the designated 4-hour time window
- On the due date, the coordinated cutover will take place using current provisioning processes

5.5 Pre and Post Order Completion Restoral Process (or Throwback Process)

- The restoral process (also referred to as a throwback process) is available at the CLEC's request due to out-of-service issues and when the CLEC requires a restoral/throwback back to the UNE-P service
- ***The restoral/throwback process can only occur within a twenty-four (24) hour window of the UNE-L order Due Date.***
- The CLEC will use follow the requirements in 5 5.1 or 5 5 2 or 5 5 3 below depending on whether the order is (1)coordinated/non-coordinated *completed* UNE-L order, (2)coordinated *not* completed UNE-L order, (3)non-coordinated *not* completed order:

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.5.1 Coordinated or Non-Coordinated '*Completed*' UNE-L order

- CLEC submits Expedited LSR to the Local Carrier Service Center (LCSC) using one of the following fax numbers
  - Birmingham Fax Server – 888-792-6271
  - Atlanta Fax Server – 888-581-6038
- The LSR Package requesting a throwback to UNE-P must contain the following information:

LSR Fields	Field information
LSR Remarks	Restoral UNE-L to UNE-P
REQTYP	M
Local Service Request Page	ACT = V MI = C, D
Port Service Page	LNA = V, G FA=N UNE-P Telephone Number
Port Service Page - ECCKT Field	UNE-L associated Loop Circuit ID
Directory Listing	Fill out as any other ACT=V migration request
EXP	Y

- The CLEC must advise the BellSouth CCPM of the restoral/throwback request
- UNE-P Non-Recurring, Recurring and Expedite rates will be charged if applicable.

5.5.2 Coordinated '*Not Completed*' UNE-L Order

- CLEC calls the CWINS Provisioning Group to request restoral/throwback to the UNE-P and if the number porting has been completed, the CLEC requests port-back activity
- Refer to the **CWINS Location and Hours** web site for CWINs telephone numbers
- Orders will be placed in Missed Appointment (MA) status
- CLEC submits supplemental (sup) order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV)
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.5.3 Non-Coordinated *'Not Completed'* UNE-L order

- CLEC emails CWINS Enhanced Delivery (EnDI) Group to request restoral/throwback
- CWINS EnDI email address is cwins lnp@bellsouth com
- Orders will be placed in MA status
- If the number porting has been completed, the CLEC will call the Fleming Island LCSC Call Center at 800-872-3116 to request port-back activity before the CLECs submits a sup order
- LCSC will advise the CLEC of port-back process
- CLEC submits sup order to cancel or reschedule conversion request
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV)
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request

5.6 Same-day End-user Account Migrations

Same day End-user Account Migrations are available upon CLEC request Same day end-user account migration means that all lines associated with an end-user from the same Serving Wire Center will be assigned the same due date

- CLEC will group the same end-user accounts together on the Project Notification form
- CLEC will submit the Project Notification form and indicate the same Due Date desired, at the EATN level, in the Special Handling column
- The BellSouth CCPM will coordinate with the appropriate internal groups to ensure that all end-user account migration activity is performed on the same due date

5.7 CLEC to CLEC Migration of UNE-P to UNE-L

This process is available with the Bulk Migration process as follows

- CLEC (CLEC A) to CLEC (CLEC B) Migration of UNE-P to UNE-L is defined as a facility based CLEC (CLEC B) that is migrating the UNE-Ps, previously held by another CLEC (CLEC A), to UNE-Ls
- CLEC B will prepare the Project Notification form using the same Bulk Migration requirements as specified within this document
- The Project Notification form must contain all the necessary UNE-P and UNE-L information according to the requirements of the form
- CLEC B must have an end-user letter of authorization (LOA) on file (it must be available if requested)

UNE-P to UNE-L Bulk Migration

6. 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	BellSouth CCPM 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 BellSouth CCPM receives corrected Project Notification from the CLEC and continues the negotiation process
3	BellSouth CCPM 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 BellSouth CCPM, 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

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UNE-P to UNE-L Bulk Migration

7. 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 Customer Care Project Manager (CCPM) For help with identifying a BellSouth CCPM , the CLEC should contact its BellSouth Customer Support Manager
- The BellSouth CCPM 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 CCPM will coordinate with BellSouth's field forces to schedule the migration Due Dates
- Once the review with the field forces is complete, the BellSouth CCPM 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 CCPM

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UNE-P to UNE-L Bulk Migration

8. 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 Port, 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

9. 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

10 Intervals

10.1 Bulk Migration Project Notification Interval

- The "CCPM *Targeted Response Interval*" column in the table below represents the targeted number of business days in which the BellSouth CCPM 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 BellSouth Customer Care 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 BellSouth CCPM will attempt, where possible, to assign the work such that migrations occur on the requested DDD

# of end-user Tel. Numbers	CCPM 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	4 business days	3 business days	14 business days	21 business days
100-200	6 business days	3 business days	14 business days	23 business days
201 +	To be determined	3 business days	14 business days	Contact CCPM

10.2 Bulk Request Service Order Intervals

- The BellSouth CCPM 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

10.3 Example of Intervals

An example of Intervals follows:

- March 1, 2004 - CLEC submits Project Notification with 87 end-user telephone numbers to the BellSouth CCPM
- March 5, 2004 (4 business days) – the BellSouth CCPM sends the Project Notification with firm Due Dates to the CLEC
- March 8 – March 10 (3 business days) – CLEC will prepare and submit mechanized Bulk Request via the electronic interface
    - March 30, 2004 (14 business days) – the earliest assigned Due Date on the Project Notification returned to the CLEC

UNE-P to UNE-L Bulk Migration

11. Acronyms

AECN	Alternate Exchange Carrier Number
ADSL	Asymmetrical Digital Subscriber Line
BOPI	Bulk Order Package Identifier
CCPM	Customer Care Project Manager
CHC	Coordinated Hot Cut
CLEC	Competitive Local Exchange Carrier
CWINS	Customer Wholesale Interconnection Network Services
DDD	Desired Due Date
EATN	Existing Account Telephone Number
EnDI	Enhanced Delivery
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
PON	Purchase Order Number
RESID	Reservation Identification
RSAG	Regional Street Address Guide
SUP	Supplemental
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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Non-coordinated Notification Web Tool

"Under Development"

- **Provides list of non-coordinated pending orders by due date**
- **Provides list of "go ahead" notifications with time stamp**
- **Provides CLEC no dial tone notification with time stamp**
- **Attached are draft screen prints of information to be contained in system**

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(CLEC NAME)
CLEC LIST OF PENDING ORDERS
Due Date 02/22/2004
7:00AM

SVCREQID	REUSESVCORD	PON	PROJNUM	*OUTSIDE DISP* OSP REQ	*INSIDE DISP* CO REQ	CIRCUIT ID
NR111111	CQREUxxxxxx	PON123456	ABC12345	Y		80 TYNU xxxxxx SB
NR222222	CQREUxxxxxx	PON123457		Y		80 TYNU xxxxxx SB
NR333333	CQREUxxxxxx	PON123458		N	Y	80 TYNU xxxxxx SB
NR444444	CQREUxxxxxx	PON123459		Y		80 TYNU xxxxxx SB
NR555555	CQREUxxxxxx	PON123460		N	Y	80 TYNU xxxxxx SB
NR666666	CQREUxxxxxx	PON123461	123ABC	N	Y	80 TYNU xxxxxx SB

GRAND TOTAL **6**

BELLSOUTH

GO-AHEAD NOTIFICATION
January 22, 2004

CLEC (CLEC OCN)

BellSouth SVC ORD # Number	Due Date	Wire Center	Circuit Identification	Purchase Order Number	Project Number	Notification Date/Time
NR111111	1/22/04 ~~3 30pm~~	954761	80 TYNU xxxxxx SB	PON123456	ABC123 45	1/22/04 10 32 am
NR222222	1/22/04 ~~3 30pm~~	954761	80 TYNU xxxxxx SB	PON123457		1/22/04 10 42 am
NR333333	1/22/04	954761	80 TYNU xxxxxx SB	PON123458		1/22/04 10 52 am
NR444444	1/22/04	954761	80 TYNU xxxxxx SB	PON123459		1/22/04 10 53 am

WEB Report Updated 1/22/04 @ 11 15a

BELLSOUTH

Currently Under Development

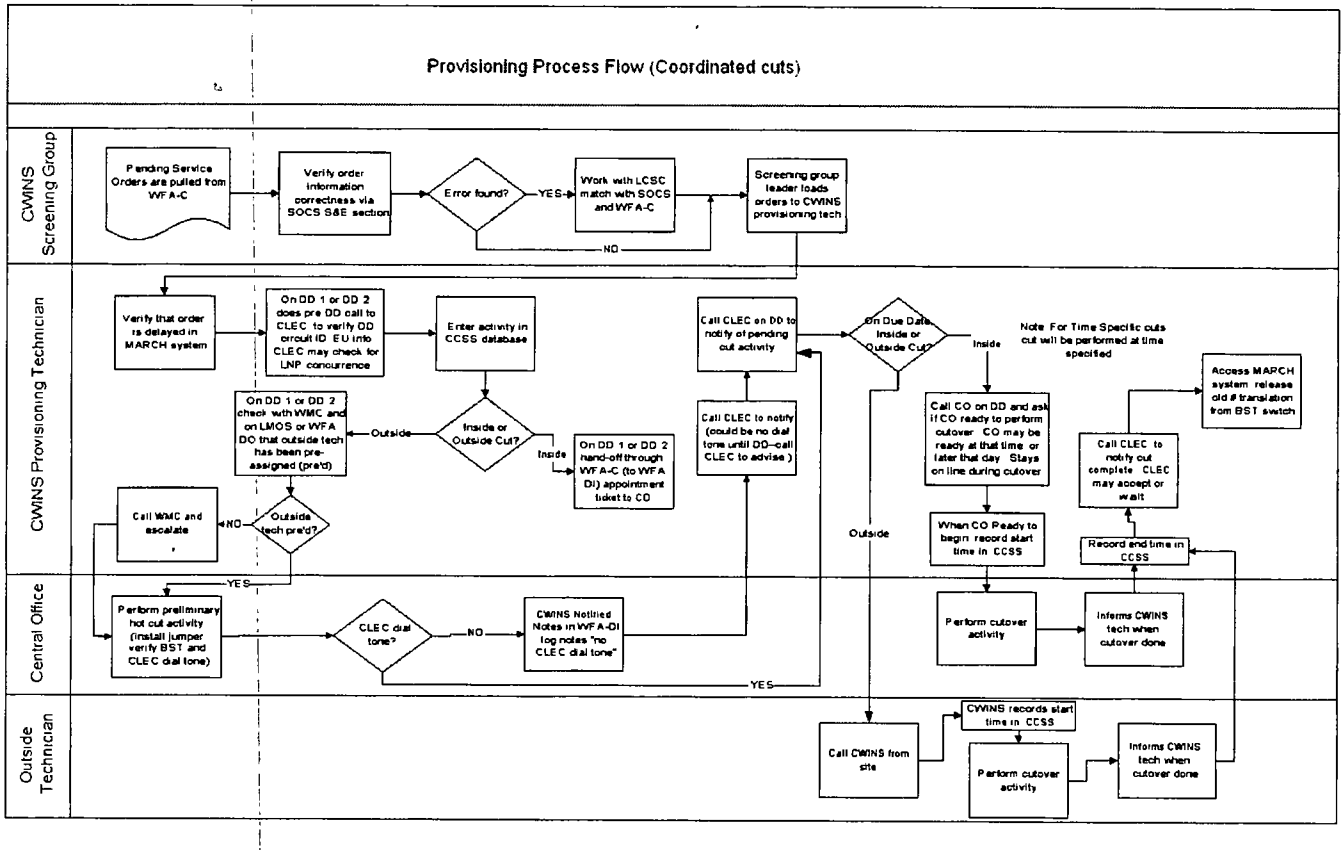
"CLEC No Dial Tone Notification"
January 22, 2004

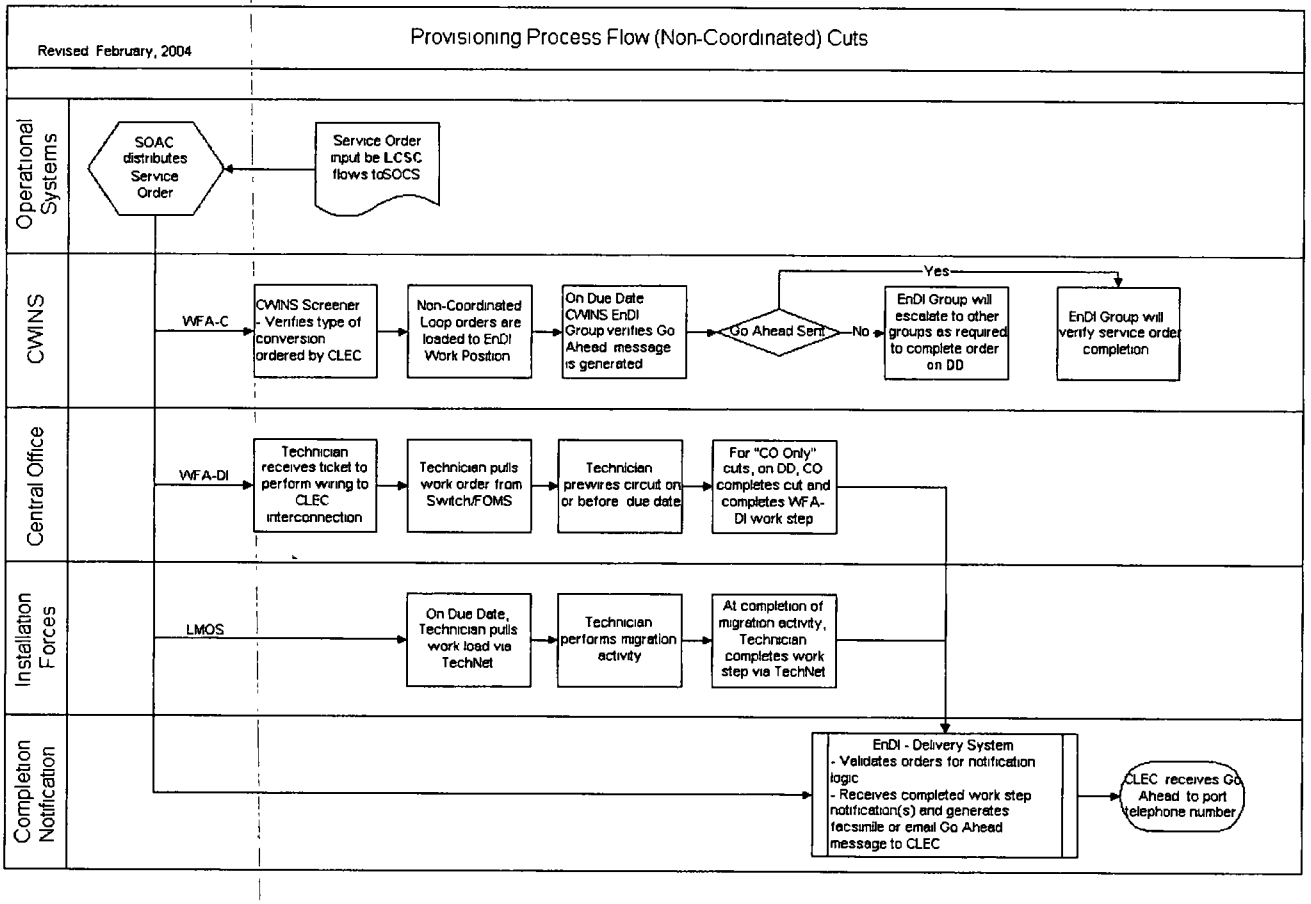
CLEC (CLEC OCN)

The following order/circuit (s) have been have been placed into CLEC – No Dial Tone status

BellSouth SVC ORD #	Due Date	Circuit Identification	Purchase Order Number	Project Number	Placed on CLEC – No Dial Tone Status
NR777777	1/23/04	80 TYNU 667xxxSB	PON123456		1/22/04 10 30 am
NR555555	1/22/04 ~~3 30pm~~	80 TYNU xxxxxx–SB	PON123460		1/21/04 09 00 am

WEB Report Updated 1/22/04 @ 11 15a


Provisioning Process Flow (Coordinated cuts)
CWINS Screening Group
CWINS Provisioning Technician
Central Office
Outside Technician
Pending Service Orders are pulled from WFA-C
Verify order information correctness via SOCS S&E section
Error found?
YES
NO
Work with LCSC match with SOCS and WFA-C
Screening group leader loads orders to CWINS provisioning tech
Verify that order is delayed in MARCH system
On DD 1 or DD 2 does pre DD call to CLEC to verify DD circuit ID EU info CLEC may check for LNP concurrence
Enter activity in CCSS database
Inside or Outside Cut?
Outside
Inside
On DD 1 or DD 2 check with WMC and on LMOS or WFA DO that outside tech has been pre-assigned (pre'd)
On DD 1 or DD 2 hand-off through WFA-C (to WFA DI) appointment ticket to CO
Outside tech pre'd?
NO
YES
Call WMC and escalate
Perform preliminary hot cut activity (install jumper verify BST and CLEC dial tone)
CLEC dial tone?
NO
YES
CWINS Notified Notes in WFA-DI log notes "no CLEC dial tone"
Call CLEC on DD to notify of pending cut activity
Call CLEC to notify (could be no dial tone until DD--call CLEC to advise)
On Due Date Inside or Outside Cut?
Inside
Outside
Note For Time Specific cuts cut will be performed at time specified
Call CO on DD and ask if CO ready to perform cutover CO may be ready at that time or later that day Stays on line during cutover
When CO Ready to begin record start time in CCSS
Perform cutover activity
Informs CWINS tech when cutover done
Call CLEC to notify cut complete CLEC may accept or wait
Access MARCH system release old # translation from BST switch
Record end time in CCSS
Call CWINS from site
CWINS records start time in CCSS
Perform cutover activity
Informs CWINS tech when cutover done


Revised February, 2004
Provisioning Process Flow (Non-Coordinated) Cuts
Operational Systems
CWINS
Central Office
Installation Forces
Completion Notification
SOAC distributes Service Order
Service Order input be LCSC flows toSOCS
WFA-C
CWINS Screener - Verifies type of conversion ordered by CLEC
Non-Coordinated Loop orders are loaded to EnDI Work Position
On Due Date CWINS EnDI Group verifies Go Ahead message is generated
Go Ahead Sent
Yes
No
EnDI Group will escalate to other groups as required to complete order on DD
EnDI Group will verify service order completion
WFA-DI
Technician receives ticket to perform wiring to CLEC interconnection
Technician pulls work order from Switch/FOMS
Technician prewires circuit on or before due date
For "CO Only" cuts, on DD, CO completes cut and completes WFA-DI work step
LMOS
On Due Date, Technician pulls work load via TechNet
Technician performs migration activity
At completion of migration activity, Technician completes work step via TechNet
EnDI - Delivery System
- Validates orders for notification logic
- Receives completed work step notification(s) and generates facsimile or email Go Ahead message to CLEC
CLEC receives Go Ahead to port telephone number

BellSouth Telecommunications, Inc
TRA Docket No 03-00526
Exhibit KLA-4

Force Model

Proprietary Information

Hot Cut Report Notification Summary

BellSouth Telecommunications, Inc
TRA Docket No 03-00526
Exhibit KLA-5
Page 1 of 1

Average time from Cut Completion to CLEC Notification (HRS MIN SEC)

State	Oct-02	Nov-02	Dec-02	Jan-03	Feb-03	Mar-03	Apr-03	May-03	Jun-03	Jul-03	Aug-03	Sep-03	12 Mo Avg
AL		0 01 00	0 02 00	0 00 30	0 01 00		0 00 20	0 00 00	0 00 00	0 01 00			0 00 35
FL	0 01 57	0 01 29	0 01 18	0 01 13	0 01 10	0 01 06*	0 01 11	0 01 15	0 02 59	0 01 02	0 03 25	0 00 59	0 01 35
GA	0 01 47	0 02 06	0 01 23	0 13 56	0 11 41	0 01 11	0 01 22	0 01 08	0 01 56	0 01 47	0 01 03	0 00 59	0 02 16
KY				0 02 00				0 02 00				0 01 00	0 01 40
LA	0 01 08	0 01 32	0 02 20	0 01 31	0 01 30	0 01 34	0 01 37	0 01 19	0 01 41	0 02 03	0 02 05	0 02 05	0 01 41
MS	0 17 00	0 01 20	0 01 06	0 01 27	0 01 20	0 01 47	0 00 38	0 01 40	0 02 33	0 01 24	0 01 26	0 01 25	0 03 09
NC/SC	0 01 22	0 01 31	0 01 04	0 01 42	0 02 00	0 01 15	0 02 05	0 01 26	0 01 33	0 01 30	0 02 04	0 01 03	0 01 35
TN	0 01 37	0 01 55	0 02 33	0 01 35	0 01 35	0 01 47	0 02 02	0 01 32	0 01 14	0 01 45	0 01 43	0 01 14	0 01 44
Grand Total	**0:01:57**	**0:01:33**	**0:01:25**	**0:02:25**	**0:02:33**	**0:01:14**	**0:01:28**	**0:01:18**	**0:02:22**	**0:01:25**	**0:02:19**	**0:01:03**	**0:01:43**

Percent Notifications in 5 minutes or less

State	Oct-02	Nov-02	Dec-02	Jan-03	Feb-03	Mar-03	Apr-03	May-03	Jun-03	Jul-03	Aug-03	Sep-03	12 Mo Avg
AL		100 0%	100 0%	100 0%	100 0%		100 0%	100 0%	100 0%	100 0%			100 0%
FL	92 3%	97 4%	99 0%	98 8%	99 2%	99 1%	99 5%	99 0%	99 4%	99 5%	99 2%	98 8%	98 2%
GA	96 7%	97 9%	98 9%	97 8%	99 2%	99 2%	97 7%	99 5%	99 2%	98 0%	99 2%	99 6%	98 7%
KY				100 0%				100 0%				100 0%	100 0%
LA	100 0%	97 0%	96 8%	100 0%	97 6%	97 0%	97 4%	99 2%	94 7%	94 9%	94 0%	90 8%	96 6%
MS	85 7%	100 0%	100 0%	100 0%	100 0%	100 0%	100 0%	100 0%	77 8%	100 0%	100 0%	100 0%	96 9%
NC/SC	97 9%	97 5%	100 0%	94 4%	92 3%	98 9%	97 1%	98 9%	98 5%	97 6%	94 6%	99 4%	97 2%
TN	98 9%	93 9%	91 9%	98 7%	98 0%	97 5%	93 5%	95 3%	100 0%	98 2%	97 7%	100 0%	96 6%
Grand Total	**94.0%**	**97.3%**	**98.5%**	**98.1%**	**98.0%**	**98.8%**	**98.1%**	**98.8%**	**98.7%**	**98.5%**	**98.2%**	**98.8%**	**98.0%**

* One order was removed from the Florida data for March 2003 There was a systems anomaly on this order that caused the results to be skewed

Batch Due Date Scheduler

"Currently Under Development"

- *Implementation October 2004*
- *Replaces current spreadsheet process*
- *Properties*
  - *Allows CLECs the ability to select Batch migration due dates from a WEB-based application*
  - *Provides CLEC with BOPI (Bulk Order Project ID)*
  - *Maximum of 200 loops per day per central office*
    - *Maximum of 125 loops per day per central office per CLEC*
    - *Multiple CLECs can schedule in the same central office not to exceed the 200 loop limit*
  - *Allows migration selections for dispatched and non-dispatched*
  - *Allows special handling request for after hour scheduling*
  - *Allows special handling for AM and PM windows on coordinated migrations*

FPSC Docket 030851 Ken Ainsworth
Deposition Late Filed Exhibit 3

Hot cut work load calculation

UNE-P growth per month = 116,295
UNE-L growth per month = 19,029

October 2003
UNE-Ps in service = 2 21M
Continue UNE-P growth
For 9 months
Hot cuts per month = 19,029
(Note 1)

July 2004
UNE-Ps in service = 3 26M
PSC Decision
Continue UNE-P growth
For 5 months
Hot cuts per month = 19,029
(Note 1)

December 2004
UNE-Ps in service = 3 84M
No new UNE-Ps All growth
Becomes UNE-L
For 8 months
Hot cuts per month = 135,324
(Note 2)

August 2005
UNE-Ps in service = 3 84M
Convert 1/3 of UNE-Ps to UNEL
Handle UNE-L growth
For 7 months
Hot cuts per month = 317,998
(Note 3)

March 2006
UNE-Ps in service = 2 56M
Convert 1/3 of UNE-Ps to UNE-L
Handle UNE-L growth
For 7 months
Hot cuts per month = 317,998
(Note 3)

October 2006
UNE-Ps in service = 1 28M
Convert 1/3 of UNE-Ps to UNE-L
Handle UNE-L growth
For 7 months
Hot cuts per month= 317,998
(Note 3)

May 2007
UNE-Ps in service = 0
Handle UNE-L growth
Going forward
Hot cuts per month = 135,324
(Note 4)

Note 1 Only stand-alone UNE-L requests require a hot cut (19,029)
Note 2 Sum of stand-alone UNE-L requests plus UNE-P growth requires a hot cut (19,029 + 116,295 = 135,324)
Note 3 Sum of stand-alone UNE-L requests plus UNE-P growth plus attrition of UNE-P embedded base requires a hot cut (19,029 + 116,295 + ((3 84M * 0 333)/7) = 317,998
Note 4 Sum of UNE-L growth and UNE-P growth requires a hot cut (19,029 + 116,295 = 135,324)

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF ALFRED A. HEARTLEY

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO 03-00526

FEBRUARY 27, 2004

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

A. My name is Alfred A. Heartley. My business address is 754 Peachtree Street, Atlanta, Georgia 30308. My title is General Manager – Wholesale Performance and Regional Centers

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE WITH BELLSOUTH

A. I graduated from North Carolina State University in 1971 with a BS Degree in Applied Mathematics. I have over 32 years experience in the telecommunications industry working for BellSouth. I have held numerous management positions in BellSouth, including positions involving outside plant engineering and construction, installation and maintenance, central office operations, data processing and process and performance improvement.

Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to explain how the BellSouth Network Services organization is prepared to scale the network operations to provide seamless, cost-effective hot cuts (whether individual; project; or batch) in the volumes likely to be presented if BellSouth obtains full relief from providing unbundled circuit switching My testimony will demonstrate that BellSouth's network operations can be scaled both to convert the embedded base of UNE-Ps and to provision the new UNE-L orders that would result from the removal of unbundled circuit switching.

Second, I will demonstrate that the network operations portions of BellSouth's hot cut processes are regional.

Q. PLEASE EXPLAIN NETWORK SERVICES ROLE IN THE HOT CUT PROCESS.

A. BellSouth provides service to both retail and wholesale customers through its Network Services organization. This department is responsible for performing the actual provisioning, maintenance, and repair of customer services within the nine BellSouth states. Network Services is a single team of employees that reports to one corporate officer, the President of BellSouth Network Services, who in turn reports to the CEO of BellSouth. These Network employees are organized into common work functions These work functions are independent of the type of customer – retail, access, or wholesale. The main work functions into

which these employees are organized are central office operations, engineering and construction, and installation and maintenance.

In the single or batch Hot Cut process the central office operations employees will perform the actual central office wiring required to perform the hot cut. The installation and maintenance employees will perform any wiring changes required in the outside plant network to perform the hot cut

I. SCALABILITY OF THE NETWORK OPERATIONS

Q. HOW WILL NETWORK SERVICES HANDLE INCREASED HOT CUT DEMAND WITH CURRENT FORCE IF RELIEF IS GRANTED FROM UNBUNDLED CIRCUIT SWITCHING?

A. Network Services is prepared to move personnel to locations requiring additional staffing if the local employees cannot handle the increased load As the FCC recognized in BellSouth's section 271 proceedings, BellSouth's network forces and network processes and procedures are regional[1] Our employees are trained in regional training centers and therefore can be relocated to areas requiring additional staffing when necessary. Our methods and procedures are developed and maintained by a regional staff and therefore minimal training will be required for any loaned forces. If the additional staffing is required on a

[1] FCC's Alabama, Kentucky, Mississippi, North Carolina, and South Carolina 271 Order, dated September 18, 2002, ("Five-State Order"), WC Docket No 02-150, ¶¶130-135 and Florida/Tennessee 271 Order, dated December 19, 2002, WC Docket No 02-307, ¶ 81

permanent basis, Network Services will hire the necessary personnel to handle any increased load.

Q. ARE BELLSOUTH'S NETWORK OPERATIONS SCALABLE?

A. Absolutely. BellSouth has over one hundred years of experience in managing force and load to ensure that it can provide its customers service Managing force and load for hot cuts to provide UNE loops to BellSouth wholesale customers is no different Staffing the network forces to meet expected needs is business as usual for BellSouth

Q. HOW DOES BELLSOUTH MANAGE FORCE AND LOAD?

A. One of the major tools BellSouth uses to manage force and load in both network operations and in its centers is the Force Model. A Force Model allows the user to take certain inputs and generate anticipated volumes and the force needed to handle those volumes

Q. HAS NETWORK SERVICES DONE A FORCE MODEL TO FORECAST THE ADDITIONAL HOT CUT LOAD THAT WILL BE REQUIRED IF UNE-P RELIEF IS GRANTED?

A. Yes. BellSouth has run force models to forecast the additional load necessary in the centers and in network operations if BellSouth receives relief from unbundled switching. I will discuss the network operations force model and the results of

that model for the network services operation BellSouth witness Ken Ainsworth discusses the results of the centers force model for the centers personnel.

Q. WHAT ARE SOME OF THE INPUTS THAT GO INTO THE NETWORK FORCE MODEL?

A. Some examples of the network inputs that go into the force model are as follows:

1. Forecast of inward movement and lines in service for various products including 1FR, 1FB, UNE, ADSL, DS1, DS3 etc
2. Assumptions for trouble report rates and dispatch rates
3 Productivity levels
4. Productive vs. non-productive hours
5. Capital expenditures
6. Span of Control

Q. WHAT ASSUMPTIONS DID BELLSOUTH MAKE ABOUT THE VOLUME OF HOT CUTS IF BELLSOUTH OBTAINS RELIEF FROM UNBUNDLED CIRCUIT SWITCHING?

A. BellSouth made various assumptions about the volume of UNE-L in its forecast. In each instance, however, BellSouth took the highest expected volumes to generate a "worst-case" view of UNE-L volume. As I will demonstrate, BellSouth can scale its network forces to meet that "worse-case" scenario.

Q. WHAT DO YOU MEAN BY WORST CASE SCENARIO?

A. By that, I mean the absolute maximum amount of hot cuts that the central office forces and I&M forces would have to handle if the following were to occur:

1. This Commission finds that CLECs are not impaired without unbundled switching (and thus, UNE-Ps) in any market in BellSouth's nine-state region.
2. CLPs decide to convert the totality of their UNE-P base to unbundled loops attached to the CLECs' switches rather than BellSouth's switches
3. UNE-P growth and UNE-L growth is maintained throughout the relevant period for the absolute highest volumes of each that has occurred at any time in the last 33 months that BellSouth has maintained records.

Q. WHAT MONTHLY VOLUME OF UNE-P TO UNE-L CONVERSIONS RESULTS FROM YOUR ASSUMPTIONS?

A. The worst-case monthly volume of hot cuts (except for adjustments to that volume that I will discuss later in this testimony) is 317,998 across the entirety of BellSouth's nine-state region. The following explains how I arrived at that value:

The quantity of UNE-Ps in service across BellSouth's nine-state region was about 2.21 million at the end of October 2003. The highest single-month volume of UNE-Ps added (116,295) occurred in June 2002. The highest single-month volume of UNE-Ls inward movement (19,029) occurred in January 2001. The pictorial in Exhibit KLA-3, which is attached to Ken Ainsworth's testimony, depicts how those volumes grow over time.

Following is a brief explanation:

In October 2003, there were about 2.21million UNE-Ps in service. Projecting forward for nine (9) months to July 2004 (the earliest expected decision by a Utilities Commission in BellSouth's region), there would be 3.26 million UNE-Ps in service (2 21M + (9 * 116,295). However, because the conversion of a BellSouth retail account to a UNE-P arrangement does not require a hot cut, the monthly volume expected in July 2004 is equal to the quantity of "stand-alone" unbundled loops requested (19,029).

Assuming that in July 2004, all nine Commissions in BellSouth's region decided that CLECs are not impaired without unbundled switching and that CLECs may continue to request UNE-Ps for an additional five (5) months, the expected quantity of UNEP-s in service in December 2004 would be 3 84 million This level of UNE-Ps becomes the "embedded base" which later will be converted to stand-alone unbundled loops via the hot cut process. For the next eight (8) months, the monthly volume of hot cuts would rise to 135,324. This is the sum of the worst-case unbundled loop volume (19,029) plus the worst-case monthly growth for UNE-Ps (116,295) that now would be unbundled loops also.

Beginning in August 2005, BellSouth would begin the transition of the embedded base of UNE-Ps (3.84 million) plus handle the worst-case monthly unbundled loop volume (19,029) and the worst-case monthly UNE-P growth volume (116,295). During each of the subsequent seven-month intervals, BellSouth would migrate one third of the embedded base. Thus, the worst-case monthly hot cut volume at the region level would be 317,998 (that is, 19,029 + 116,295 +

((3.84M * 0 333)/7))

Because on average there are 22.3 business days per month, the daily volume becomes 14,260 (that is, 317,998 / 22.3) at the regional level.

Q. WHAT OTHER ADJUSTMENTS TO ANTICIPATED VOLUMES HAVE YOU ASSUMED?

A. During CLEC workshops, CLECs have suggested that two adjustments to anticipated volumes should be made. While I do not necessarily agree with such a suggestion, I have included those adjustments to prove my point that BellSouth can enlarge its LCSC and CWINS groups to handle even worst-case volumes with these additional factors considered The two adjustments suggested are to increase the volumes to include some level of "churn" from one local carrier to another and to increase the volumes to include some level of increased trouble report rate for unbundled loops compared to UNE-P arrangements. Accordingly, I made an upward adjustment of 4% churn per month (48%) per year and an upward adjustment of 5% increased trouble report rate. I treated these adjustments as if they resulted in additional hot cuts (again, a worst case assumption) and the resultant monthly volume for hot cuts rose to 347,254 per month (15,572 per business day)

Q. DID BELLSOUTH FACTOR DISPATCHES AS A RESULT OF IDLC INTO ITS FORCE MODEL?

A. Yes. The model includes the percent of IDLC in each central office Employees in our installation and maintenance operations perform hot cuts when IDLC is involved. These employees will be involved in hot cuts when we have to change the outside plant facility, such as converting a loop from integrated digital loop carrier (IDLC) to non integrated DLC or a copper pair. This will vary by central office and facility availability.

Q. DID BELLSOUTH CONSIDER COORDINATED VERSUS NON-COORDINATED CUTS IN THE MODEL?

A. Yes. Network Services staff considered the percent of conversions and ongoing activity that would go to SL1s and SL2s and the percent that would be coordinated and non coordinated.

Q. ONCE YOU HAVE THE LOAD PROJECTIONS, HOW DO YOU USE THEM?

A. The load projections were multiplied by the amount of time required in the central office and field to complete the wiring and perform the hot cuts. We calculated the time projections based on wiring and cutting one line per order This method yielded the largest number of employees required. We anticipate that when the conversions do occur, there will be some efficiency gained when multiple hot cuts can be performed at the same location.

Q. USING THESE ASSUMPTIONS, WHAT FORCE AND LOAD DID THE MODEL GENERATE?

A The model generated a load of a maximum of 43 hot cuts in a central office per business day. Exhibit AH-1 sets forth the expected load per day in the top 20 central offices in Tennessee. The total load per day for all central offices in Tennessee is shown at the bottom of the exhibit Based on this load, the model yielded a force increase of an additional 148 central office employees in Tennessee and an additional 63 installation and maintenance employees.

Q. COULD BELLSOUTH HIRE 148 CENTRAL OFFICE EMPLOYEES AND 63 INSTALLATION AND MAINTENANCE EMPLOYEES?

A. Absolutely. Again, force and load management is something BellSouth has been doing for decades. BellSouth would hire the additional force by engaging its Human Resources Department. Human Resources would advertise the jobs in local media and conduct job fairs and testing events to screen applicants Human Resources would require 90 days from notification to employees being added to the payroll

Q. WHERE WOULD BELLSOUTH FIND THIS KIND OF WORKFORCE?

A. BellSouth will find these potential employees in technical schools, military bases and other colleges. Based on the amount of downsizing that has occurred in the industry, many applicants may be looking for technical jobs like we will have.

Q. COULD BELLSOUTH TRAIN 148 NEW CENTRAL OFFICE EMPLOYEES AND 63 NEW INSTALLATION AND MAINTENANCE EMPLOYEES SUFFICIENTLY TO PERFORM HIGH QUALITY HOT CUTS?

A. Absolutely. First, as Mr. Ainsworth explains in his testimony, hot cuts are not difficult Consequently, BellSouth's basic training will permit employees to perform the hot cut functions. BellSouth trains new employees through its region-wide training program. Technical training is developed and delivered by a centralized BellSouth Training organization that operates training facilities in 5 locations scattered throughout the nine-state region. These training locations are staffed with 35 people and are supplemented by contract trainers as needed. Approximately 70% of the training is performed at the training centers with the remaining 30% being "suitcased" to the various locations throughout the nine-state region. Technical personnel throughout the nine-states attend training at all of these locations depending on the subject matter and class sizes Because the training is identical, it is irrelevant which location is selected. Training is divided by subject matter, not by state. Consequently, BellSouth has more than enough training facilities to train these new network employees.

The training necessary to perform hot cuts will typically take between 15 to 35 days of mandatory training. In addition, employees receive on-the-job training related to their work assignments

Q. BASED ON THIS HIRING AND TRAINING PLAN, HOW LONG WOULD IT TAKE FOR BELLSOUTH TO FIND CANDIDATES, HIRE THEM, TRAIN THEM, AND HAVE THEM ON THE JOB PERFORMING HOT CUTS?

A BellSouth would required 4 to 5 months to hire, train and place job applicants on the job and have them performing high quality hot cuts.

Q. DOES BELLSOUTH HAVE TO HIRE ALL OF THESE PEOPLE AT ONCE?

A. No. The transition period in the order is almost 2 years. So BellSouth has an extended period over which to add and train the force additions.

Q. HAS BELLSOUTH HAD TO INCREASE FORCE IN THE PAST TO HANDLE LARGE CONVERSIONS OR WORKLOADS?

A. BellSouth has formed cutover teams in the past to handle central office conversions, e g. the 1996 Summer Olympic Games in Atlanta. We have also hired and trained temporary employees to help handle the increased summer workload For example, BellSouth hired and trained 1000 Service Technicians in 1999 to handle our service order and trouble load and to reduce overtime. During 1998 to 2001 we hired over 3300 employees related to ENCORE and Wholesale Operations During 2001 and 2002 we hired over 800 Service Technicians to handle increased ADSL demand. We organize our training around the tasks to be performed and focus our force on those tasks We anticipate that the hot cuts generated by UNE-P relief will require teams of

employees performing specific tasks for up to 21 months. We also anticipate that we will be able to supplement existing force in an area with employees from other areas and to hire the necessary force to accomplish our goal in the required timeframe.

Q. ARE THERE ANY INHERENT LIMITATIONS IN THE NUMBER OF HOT CUTS THAT CAN BE PERFORMED IN A CENTRAL OFFICE IN A SINGLE DAY?

A. There are no limitations that BellSouth cannot manage around. Loop conversion work is just part of the overall work done on a daily basis in any given central office. Depending on the workload and lay out of the central office, anywhere from 2 to 10 (or more) central office technicians may be at work simultaneously on the same Main Distributing Frame ("MDF") with no negative impact on productivity. Cable pairs are deployed on the MDF as cables are brought into the central office. Moreover, when multiple loop conversions are scheduled in a single day for a single central office, the pre-wiring work may be done over several shifts in the days leading up to the due date. Because the access lines for these conversions are generally spread throughout the central office, the actual cutovers are then accomplished without technicians interfering in each other's workspace. Finally, large hot cut quantities are project-managed One of the benefits of project-management is to schedule the central office forces such that both the pre-wiring and the due date work can be accomplished without space constraints.

II. REGIONALITY

Q. IS BELLSOUTH'S HOT CUT PROCESS REGIONAL?

A. Yes As the FCC confirmed in BellSouth's section 271 applications, BellSouth's network operations are regional.[2] Thus, BellSouth's Network services operations personnel perform the hot cut processes the same way in all nine of BellSouth's states

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

[2] Id

Exhibit AH-1

Top 20 Tennessee Wire Centers List

Worst Case Force Projection

Percentage of UNEPs that will convert to UNEL	100%
Business days per month	22 3
Regional growth UNEPs per month	116,295
Regional IM UNELs per month	19,029
Churn percentage per month	4%
Maintenance and Repair Report Rate increase per mo	5%

Daily Conversion % to SL1 Non-Coordinated	50 00%		First Line
Daily Conversion % to SL1 Coordinated	25 00%	**CO Cutover Times (Hours)**	**(Worst Case)**	**Additional Line**
Daily Conversion % to SL2 (Coordinated)	25 00%	CO Time SL1 Non Coordinated	0 43333	0 30000
		CO Time SL1 Coordinated	0 60000	0 33333
		CO Time SL2 (Coordinated)	1 05000	0 63333
		Outside Tech Cutover Hours per Dispatch	1 0000	

STATE	W/C	I&M Work Center	% of Total UNE-Ps	% IDLC	UNE-P Growth per Month	UNE-L Growth per Month	Total UNE-P Dec 2004	No new UNEP Only new UNE-L Monthly UNE-P to UNE-L Conversions plus Normal UNE-P and UNE-L Growth	Daily UNE-P to UNE-L Conversions	Daily Conversions Requiring Outside Dispatch	Daily Conversions to SL1 Non-Coordinated	Daily Conversions to SL1 Coordinated	Daily Conversions to SL2 (Coordinated)	CO Transfer Man-Hours	Outside Transfer Man-Hours
TN	mmphtnba	2820 Shelby Bartlett T	0 27802%	45%	323	53	10 671	884	43	19	22	11	11	27 23	19 36
TN	clvltnma	1820 New Ashland Cit	0 25499%	49%	297	49	9 787	811	40	20	20	10	10	24 97	19 56
TN	mmphtnoa	3845 Outland Memphi	0 25499%	25%	297	49	9 787	811	40	10	20	10	10	24 97	9 75
TN	chlgtnbr	6222 Hwy 58, Harrison	0 25350%	49%	295	48	9 729	806	39	20	20	10	10	24 83	19 51
TN	mrbotnma	116 South Cannon Ave	0 23169%	51%	269	44	8 892	737	36	19	18	9	9	22 69	18 56
TN	mmphtngt	2101S Germantown R	0 21897%	59%	255	42	8 404	696	34	20	17	9	9	21 45	20 07
TN	clevtnma	114 Refreshment Lane	0 21327%	34%	248	41	8 185	678	33	11	17	8	8	20 89	11 19
TN	knvltnma	901 LINCOLN RD Kno	0 20902%	15%	243	40	8 022	664	33	5	16	8	8	20 47	4 95
TN	mavltnma	901 LINCOLN RD Mai	0 20051%	34%	233	38	7 696	637	31	11	16	8	8	19 64	10 73
TN	mmphtnsl	3925 Sedgwick Memp	0 18725%	16%	218	36	7 187	595	29	5	15	7	7	18 34	4 78
TN	knvltnwh	9733 PARKSIDE DR I	0 18530%	58%	215	35	7 112	589	29	17	14	7	7	18 15	16 72
TN	svvltnmt	101 CHURCH ST Sev	0 17852%	46%	208	34	6 851	568	28	13	14	7	7	17 48	12 68
TN	chlgtndt	1122 Riverfront Parkw	0 15702%	7%	183	30	6 027	499	24	2	12	6	6	15 38	1 69
TN	nsvltnch	5841 Nolensville Rd N	0 14327%	26%	167	27	5 499	455	22	6	11	6	6	14 03	5 84
TN	jcsntnma	95 American Drive Jac	0 14250%	27%	166	27	5 469	453	22	6	11	6	6	13 96	5 91
TN	mmphtnct	787 S Willett Memphis	0 13503%	1%	157	26	5 182	429	21	0	11	5	5	13 23	0 11
TN	fkintnma	500 Liberty Pike Frank	0 13385%	52%	156	25	5 137	426	21	11	10	5	5	13 11	10 75
TN	jcsntnns	95 American Drive Jac	0 12091%	34%	141	23	4 641	384	19	6	9	5	5	11 84	6 49
TN	chlgtnns	1122 Riverfront Parkw	0 11955%	4%	139	23	4 588	380	18	1	9	5	5	11 71	0 79
TN	mmphtnsl	4956 Old Summer Me	0 11725%	5%	136	22	4 500	373	18	1	9	5	5	11 48	0 90
Tennessee Total			**8 85868%**	**27%**	**10,302**	**1,686**	**339,997**	**28,162**	**1,379**	**371**	**690**	**345**	**345**	**868**	**371**

Headcount	116	49
Add Undistribute	139	59
Supervisors 15/	9	4
Total Force	211	

Top 20 Regional Wire Centers List

Worst Case Force Projection

Percentage of UNEPs that will convert to UNEL	100%
Business days per month	22 3
Regional growth UNEPs per month	116,295
Regional IM UNELs per month	19,029
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Maintenance and Repair Report Rate increase per mo	5%

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Daily Conversion % to SL1 Coordinated	25 00%	CO Time SL1 Non Coordinated	0 43333	0 30000
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		Outside Tech Cutover Hours per Dispatch	1 0000	

STATE	W/C	I&M Work Center	% of Total UNE Ps	% IDLC	UNE-P Growth per Month	UNE-L Growth per Month	No new UNEP Only new UNE-L Total UNE-P Dec 2004	Monthly UNE-P to UNE-L Conversions plus Normal UNE-P and UNE-L Growth	Daily UNE-P to UNE-L Conversions	Daily Conversions Requiring Outside Dispatch	Daily Conversions to SL1 Non-Coordinated	Daily Conversions to SL1 Coordinated	Daily Conversions to SL2 (Coordinated)	CO Transfer Man-Hours	Outside Transfer Man-Hours
FL	hlwdflpe	61 NW 98 AVE / 139C	1 25174%	82%	1 456	238	48 042	3 979	195	161	97	49	49	122 60	160 57
FL	miamflhl	13305 NW 45 AVENL	0 81674%	51%	950	155	31 347	2 596	127	64	64	32	32	80 00	64 44
FL	hlwdflwh	250 SW 62 AVE	0 81249%	21%	945	155	31 183	2 583	126	27	63	32	32	79 58	26 96
GA	mrtlgama	185 Old Hamilton Rd	0 70588%	52%	821	134	27 092	2 244	110	57	55	27	27	69 14	57 02
FL	prmflma	10330 SW 184 St F	0 68049%	47%	791	129	26 117	2 163	106	50	53	26	26	66 65	49 83
GA	irvlgaos	330 Oak Street	0 59361%	73%	690	113	22 783	1 887	92	68	46	23	23	58 14	67 91
FL	pmbhflcs	9500 Royal Palm Blvc	0 54365%	56%	632	103	20 865	1,728	85	47	42	21	21	53 25	47 15
FL	wpbhflga	1201 Barnett Dr Lake	0 53062%	51%	617	101	20 365	1 687	83	42	41	21	21	51 97	42 45
FL	miamflca	12800 SW 56 St Miar	0 52962%	46%	616	101	20 327	1 684	82	38	41	21	21	51 87	38 07
FL	fldfloa	4200 W Oakland Pk	0 50691%	14%	590	96	19 455	1 611	79	11	39	20	20	49 65	11 26
FL	pmbhflma	1180 Banks Rd Marg	0 48107%	37%	559	92	18 463	1 529	75	28	37	19	19	47 12	28 04
FL	ndadflbr	19051 N E 3RD CT	0 46745%	42%	544	89	17 941	1 486	73	31	36	18	18	45 78	30 64
GA	jnbogama	107 Smith Street Jon	0 43383%	63%	505	83	16 650	1 379	68	43	34	17	17	42 49	42 55
GA	smyrgama	1359 Spngs St Smy	0 43315%	33%	504	82	16 624	1 377	67	23	34	17	17	42 42	22 52
GA	wdstgacr	1200 JVL Industrial C	0 43220%	68%	503	82	16 588	1 374	67	46	34	17	17	42 33	45 93
FL	orldflph	5120 SilverStar Road	0 42568%	63%	495	81	16 338	1 353	66	42	33	17	17	41 69	41 78
FL	fldflpl	4401 DAVIE BLVD -F	0 42563%	27%	495	81	16 336	1 353	66	18	33	17	17	41 69	18 03
GA	rswlgama	850 Holcomb Bridge F	0 42048%	46%	489	80	16 138	1 337	65	30	33	16	16	41 18	30 10
GA	alprgama	1525 Hembree Rd & /	0 41699%	75%	485	79	16 004	1 326	65	48	32	16	16	40 84	48 37
FL	miamflwd	12800 SW 56 St Miar	0 40957%	55%	476	78	15 719	1 302	64	35	32	16	16	40 12	35 05
FL	fldflja	10141 W BROWARD	0 40898%	54%	476	78	15 697	1 300	64	34	32	16	16	40 06	34 26
Regional Total			**100 00000%**	**31%**	**116,295**	**19,029**	**3,838,007**	**317,903**	**15,567**	**4,827**	**7,784**	**3,892**	**3,892**	**9,794**	**4,827**

Headcount	1306	644
Add Undistributec	1567	772
Supervisors 15/1	104	51
Total Force	2495	

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO 03-00526

February 27, 2004

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

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

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A I graduated from the Georgia Institute of Technology in 1973, with a Bachelor of Science degree. In 1984, I received a Masters of Business Administration degree from Georgia State University. My professional career spans over 30 years of general management experience in operations, logistics management, human resources, sales, and marketing. I joined BellSouth in 1987, and have held various positions of increasing responsibility since that time.

Q HAVE YOU TESTIFIED PREVIOUSLY?

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

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to describe BellSouth's ordering process used when a Competitive Local Exchange Carrier ("CLEC") migrates existing multiple non-complex Unbundled Network Element – Port/Loop Combinations (UNE-P) Services to an Unbundled Network Element – Loop (UNE-L) batch migration offering, including UNE-L plus local number portability (LNP). BellSouth's "UNE-to-UNE bulk migration ordering process," as it has been labeled by BellSouth, is the ordering mechanism for the batch hot cut process that is discussed at length in the testimony of BellSouth's witness, Mr. Ken Ainsworth. Throughout this testimony, I will use the terms "batch" and "bulk" interchangeably when referring to the process of migrating UNE-P to UNE-L in batches.

I also will discuss the scalability of BellSouth's OSS

ORDERING UNE-TO-UNE BATCH MIGRATIONS

Q PLEASE DESCRIBE THE ORDERING PROCESS FOR BELLSOUTH'S BATCH MIGRATION PROCESS

A The ordering mechanism for the batch migration process is the UNE-to-UNE batch migration request. The purpose of this ordering mechanism is to allow CLECs to submit

multiple UNE-P to UNE-L conversion requests in a streamlined and efficient manner In other words, the UNE-to-UNE batch migration ordering process allows a CLEC to migrate multiple UNE-P end-users to a UNE-L offering without submitting multiple, individual local service requests ("LSRs").

Q. WHAT ARE SOME OF THE BENEFITS OF THE UNE-TO-UNE BATCH MIGRATION PROCESS?

A. With this electronic process, a CLEC can migrate two to 99 UNE-P accounts to UNE-L on a single submission. Depending on the conditions, CLECs may submit UNE-to-UNE batch migration orders for up to 2,475 end users I will discuss this in more detail below.

Q. WHEN DID BELLSOUTH IMPLEMENT ELECTRONIC ORDERING OF UNE-TO-UNE BATCH MIGRATION?

A. BellSouth implemented a fully-mechanized, electronic UNE-to-UNE batch migration ordering process on March 29, 2003 with Release 12.0, as a result of change request CR0215.

Before implementation of the electronic process, BellSouth implemented a manual batch ordering process on December 4, 2002.

Q. DID A CLEC SUBMIT CHANGE REQUEST CR0215?

A Yes, on November 11, 2000, AT&T submitted CR0215 to the Change Control Process ("CCP"). This change request asked BellSouth to develop a process for migrating customers from UNE-P to UNE-L in batches. Below is an excerpt from AT&T's change request:

> AT&T would like BellSouth to implement the ability to migrate UNE to UNE orders in bulk. *For example, AT&T is providing service to customers with port/loop combinations (UNE-P) and wants to migrate a group of customers from UNE-P to UNE-L (BellSouth UNE loop/LNP with AT&T switch)* AT&T would then send a spreadsheet/bulk migration order to BellSouth containing pertinent customer specific information. (Emphasis added)

Attached as Exhibit RMP-1 is the change request. The change request is also posted at BellSouth's Interconnection web site [1]

Q. WAS CHANGE REQUEST CR0215 IMPLEMENTED ACCORDING TO THE PROCEDURES OF THE CHANGE CONTROL PROCESS ("CCP")?

A Yes. Change request CR0215 was handled by the CCP from its inception through its implementation in March 2003. Let me provide a chronology of the events leading to the implementation of CR0215.

November 8, 2000	AT&T submitted CR0215.
December 18, 2000	The CCP placed CR0215 in pending status.
January 31, 2001	The CLECs prioritized CR0215 as 7th of 14 pre-ordering and ordering change requests.
April 25, 2001	The CLECs re-prioritized CR0215 as 8th of 36 pre-

[1] http //www interconnection bellsouth com/markets/lec/ccp_live/docs/statuses/change_requests/cr0215 pdf

	ordering and ordering change requests.
February 27, 2002	CR0215 was scheduled for Release 11.0.
March 15, 2002	BellSouth distributed draft user requirements to the CLECs.
April 10, 2002	BellSouth distributed updated draft user requirements to the CLECs.
April 23, 2002	BellSouth and the CLECs held a meeting to discuss the user requirements.
June 20, 2002	BellSouth distributed updated user requirements to the CLECs.
July 9, 2002	BellSouth and the CLECs held a meeting to discuss the user requirements.
October 10, 2002	BellSouth and AT&T discussed BellSouth's ability to support 99 LSRs per bulk order rather than 100.
October 24, 2002	BellSouth distributed updated user requirements
November 7, 2002	CR0215 was moved to Release 12.0
March 29, 2003	CR0215 was implemented with Release 12.0

Q WHICH COMPANIES PARTICIPATED IN THE USER REQUIREMENTS MEETINGS?

A. At the user requirements meeting that occurred on April 23, 2002, representatives of Network Telephone, BTI, Telcordia, AT&T, and Accenture participated, in addition to representatives of BellSouth.

At the meeting on July 9, 2002, representatives of BellSouth, Allegiance, Network Telephone, AT&T, and Nuvox were in attendance Every CLEC had the opportunity to participate in the development of this electronic ordering process and AT&T, in particular, was actively involved.

Q. DOES BELLSOUTH PROVIDE INFORMATION FOR CLECS THAT ARE INTERESTED IN LEARNING ABOUT AND IMPLEMENTING THE ELECTRONIC ORDERING OF UNE-TO-UNE BATCH MIGRATIONS?

A. Certainly. The business rules for ordering UNE-to-UNE batch migrations are contained in the *Local Ordering Handbook* ("LOH"), which is available at BellSouth's interconnection web site.[2] BellSouth has also provided CLECs with the *UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration CLEC Information Package* ("CLEC information package"), which provides CLECs with general ordering information specific to the UNE-to-UNE batch migration process. The CLEC information package was originally published on March 26, 2003. On February 18, 2004, BellSouth published a new version of this document. This document is attached as Exhibit RMP-2, and also is available at the Interconnection web site [3] BellSouth revised the CLEC information package in order to incorporate new enhancements to the UNE-to-UNE batch migration process.[4] I will discuss these enhancements below.

In addition, the Local Exchange Navigation System Guide ("LENS Guide") contains ordering instructions for those CLECs that use the LENS ordering interface. The LENS Guide is posted at the Interconnection web site.[5] For those CLECs that use the EDI interface, BellSouth has provided EDI specifications, which are also posted at the Interconnection web site [6]

[2] http //www interconnection bellsouth com/guides/html/leo html
[3] The CLEC information package is posted at http //www interconnection bellsouth com/guides/html/unes html
[4] The CLECs were notified of these changes via Carrier Notification letter SN91083967, which is posted at http //www interconnection bellsouth com/notifications/carrier/carrier_pdf/91083967 pdf
[5] http //www interconnection bellsouth com/guides/html/lens_tafi html
[6] http //www interconnection bellsouth com/guides/html/leo html

Q. PLEASE DESCRIBE THE ENHANCEMENTS THAT BELLSOUTH MADE TO ITS ALREADY SEAMLESS AND EFFECTIVE BATCH HOT CUT PROCESS ON FEBRUARY 18, 2004.

A. BellSouth added the following enhancements:

- After Hours/Weekend Migrations
- Two-Hour Go Ahead Notifications for SL1 non-coordinated migrations
- Time Windows for coordinated conversions
- Pre and Post order completion restoral process (Throwback)
- Same-Day end-user account migration
- CLEC to CLEC migration (UNE-P to UNE-L)

BellSouth also reduced the interval for the project manager to return the bulk notification form to four business days (from seven) for two to 99 telephone numbers and to six business days (from 10) for 100-200 telephone numbers, as I describe in my outline of the UNE-to-UNE batch migration process below. Most of these enhancements are to the provisioning side of the process, which is under Mr Ainsworth's purview.

Q WHAT ARE THE CRITERIA THAT CLECS SHOULD CONSIDER WHEN USING THE UNE-TO-UNE BATCH MIGRATION PROCESS?

A. The batch migration ordering process must meet the same requirements as the batch hot cut process as a whole. These requirements are described in full in the LOH and summarized in the CLEC information package. Some of the requirements are: the batch migration request must be project managed, the batch migration request must contain a

minimum of two LSRs; the batch migration request may contain up to and including 99 LSRs; the batch migration request must be for the same loop type; the existing UNE-P combinations must be non-complex; and, the loops must all be in the same wire center.[7]

Q PLEASE DESCRIBE HOW THE CLEC USES THE UNE-TO-UNE BATCH MIGRATION PROCESS.

A. BellSouth's process is as follows:

1. A Bulk Notification form is sent from the CLEC to the BellSouth Project Manager (PM) to identify those UNE-P accounts to be converted to a UNE-Loop.
2 The PM reviews the form to determine if the accounts qualify for handling by the Bulk migration process and if the form entries are complete and appear accurate
3 The PM sends the form to the Network Single Point of Contact (SPOC) to determine load variations, personnel availability, and due date schedule to be applied to each of the Earning Account Telephone Numbers (EATN) accounts The PM will return the Bulk Notification form to the CLEC within the following time period based on the number of telephone number (TN) requests: 4 business days to return to the CLEC a form with up to 99 TNs and 6 business days to return a form with between 100 to 200 TNs. The Project Manager will negotiate the return interval for requests of 201+ TNs.
4. The Bulk Notification form that has now been updated to include due dates for each of the accounts will be returned to the CLEC via the PM.

[7] 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)

5. The CLEC has three (3) business days to qualify the loop(s) for the loop type being ordered, as appropriate, and submit an accurate Mechanized Bulk Local Service Request (LSR) containing the accounts and due dates The mechanized system will create individual service orders for each of the accounts that will be provisioned and completed.
6. The BellSouth Customer Wholesale Interconnection Network Services (CWINS) Center will advise the PM of any service orders that will not be completed on the due date
7 The PM will advise the CLEC on current order status.

This process is also discussed in the testimony of Mr. Ainsworth, particularly the project management and provisioning aspects of the process, and in the CLEC information package (Exhibit RMP-2).

Q. PLEASE DESCRIBE HOW CLECS MAY USE THIS BATCH MIGRATION PROCESS TO SUBMIT CLEC-TO-CLEC BATCH MIGRATIONS.

A. The CLEC-to-CLEC batch migration process allows a "winning" CLEC (CLEC B) to migrate in batches the end user customers of a "losing" CLEC (CLEC A). In other words, CLEC A to CLEC B Migration of UNE-P to UNE-L is defined as a facility based CLEC B that is migrating the UNE-P's, previously held by another CLEC A, to UNE-L's.

The winning CLEC must follow the steps that I just described, including preparing the same notification form using the requirements as specified in the CLEC information

package. In addition, the winning CLEC must have an end-user letter of authorization (LOA) on file (it must be available if requested). This process is also detailed in the CLEC information package (Exhibit RMP-2).

Q. IN STEP 5 ABOVE, YOU MENTIONED THAT THE CLEC MUST SUBMIT A BATCH MIGRATION REQUEST CONTAINING THE ACCOUNTS AND DUE DATES. COULD YOU DISCUSS THIS PROCESS IN MORE DETAIL?

A. Yes. CLECs can use either the EDI, TAG, or LENS electronic ordering interfaces to perform any pre-order functions necessary to submit the firm order batch migration request, including validating the address and qualifying the loop, as necessary, and may subsequently place a batch migration request. The CLEC first completes information for the entire batch migration package. The LOH refers to this as the "global level."[8] This information includes the Bulk Order Package Identifier ("BOPI") and information about the wire center. The CLEC also completes information about the CLEC initiator and the implementation contact person. If the migration involves designed loops, the CLEC must include contact information, including an address, for the design contact person.[9] The CLEC only enters this global level information once for the entire package.

Next, the CLEC completes the information needed for each account of the two to 99 accounts that will be migrated. The LOH refers to this as "account level" and "line level" activity. When writing the user requirements, BellSouth developed this functionality so that the CLECs would only fill out a minimum number of fields. Some of the fields that the CLECs are required to complete include the purchase order number ("PON"), the end

[8] The LENS Guide refers to this level as the "Package Level "
[9] Designed loops require BellSouth to perform design engineering activities

user's name, the billing account number ("BAN1"), the Earning Account Telephone Number ("EATN"), and the line number ("LNUM"). The CLEC would also complete the Reservation Identifier ("RESID") field, if required for the loop type being ordered. The complete list of fields is described in the LOH.[10]

Q. MUST THE CLECS PROVIDE AN ADDRESS FOR EACH ACCOUNT THAT THEY ARE MIGRATING?

A. No, CLECs do not include an address for each account. Only if the migration involves designed loops must the CLEC include address information for the design contact person, and only at the "global level" of the batch migration request.

BellSouth has simplified the number of fields that the CLECs must complete at the "account level" and "line level" for each end user on the batch migration request BellSouth was able to reduce the required information to the minimal amount necessary for conversions from UNE-P to UNE-L. To create the individual LSRs for UNE-L, BellSouth needs information that the CLEC has, such as the cable and pair information, the cable ID, and, when necessary, the reservation number for the facility (the Facility Reservation Number or "FRN"). BellSouth could not reduce the number of required fields for UNE-P to UNE-L migration to the number used when the CLECs submit a "TN migration" or "Telephone Migration" LSR. When the CLEC converts a retail or resale or UNE-P end user to its UNE-P, the CLEC can submit an LSR with just the end user's telephone number (in addition to information about the gaining CLEC), hence the name "TN migration "

[10] The LENS Guide also contains similar information for users of the LENS interfaces The "account level" and "line level" fields are referred to as the "PON level" in the LENS Guide

Q PLEASE DESCRIBE WHAT HAPPENS WHEN THE CLEC SUBMITS THE BATCH MIGRATION REQUEST VIA THE EDI, TAG, OR LENS ORDERING INTERFACES.

A. After BellSouth's systems receive the batch migration request, the first level edits are applied in order to check the request for errors. If there are no first level errors in the batch migration request, BellSouth's systems will accept the batch migration request and break the accounts into individual parts. BellSouth's systems then generate the individual LSRs, using the information provided by the CLEC at the account and line levels of the batch migration. For example, the systems take the telephone number that the CLEC provided for an individual PON and retrieve an address from the address database (the Regional Street Address Guide or RSAG). The individual LSRs are checked against the second and third level edits to determine if the data on the LSR is correct. Accurate and complete LSRs flow-through BellSouth's OSS to the service order generator (Service Order Communications System or "SOCS"), where a service order is generated from each LSR BellSouth then sends a firm order confirmation ("FOC") to the CLEC for each LSR. The service orders then move downstream for provisioning, including updating E911 databases and directory listing information, just as they would for service orders created from LSRs submitted individually.

Q WHAT HAPPENS WHEN A BATCH MIGRATION REQUEST CONTAINS AN ERROR?

A. After BellSouth's systems receive the batch migration request, they check the request for errors. BellSouth's systems perform these checks by applying first level edits to the batch

migration request. The first level edits are straightforward and basic – they are related to field length, allowable characters, required, optional, and "not allowed" fields, and the relationships between fields BellSouth checks the entire batch migration request for these types of errors before returning it to the CLECs. If a batch migration request contains a first level error or errors, BellSouth returns it to the CLEC. The CLEC may then correct the error or errors and submit a supplemental batch migration request to BellSouth.

Q. WHY DOES BELLSOUTH RETURN THE ENTIRE BATCH REQUEST TO THE CLEC?

A. The first level edits simply determine if the CLEC provided enough information so that BellSouth's systems can create the individual LSRs. If the CLEC has not provided the correct information in those fields, then BellSouth cannot generate the individual LSRs. Also consider that, if the CLEC makes an error or errors in the "global" section of the request, all the potential LSRs in the request would be affected At this stage of the process, returning the incorrect batch migration request to the CLEC is equivalent to rejecting and returning an incorrect LSR that a CLEC has submitted individually.

Q. AFTER BELLSOUTH'S SYSTEMS HAVE CREATED INDIVIDUAL LSRS FROM THE BATCH MIGRATION REQUEST, WHAT HAPPENS IF AN ERROR IS DETECTED IN AN INDIVIDUAL LSR?

A. After BellSouth's systems have created the individual LSRs from the batch migration request and information in BellSouth's systems, BellSouth will clarify any mistakes that

are found in the individual LSRs on an individual basis Thus, if one LSR out of 99 has an error, the 98 error-free LSRs will continue to process. BellSouth finds these errors when its systems apply the second and third level edits. Level 2 data edits verify that the fields in the LSR contain the correct information, such as whether the telephone number supplied by the CLEC is known by BellSouth's systems. Third level edits continue the evaluation of the data in the fields of the LSR, such as comparing a given Universal Service Order Code ("USOC") and any associated Field Identifiers ("FIDs") in a service order to ensure that the FIDs are allowed and in the proper order.

Therefore, if any data errors are found in any of the LSRs, BellSouth then clarifies the LSR individually with the CLEC, just as it would with any LSR submitted individually.

Q. EARLIER YOU STATED THAT A CLEC MAY REQUEST A MAXIMUM OF 99 ACCOUNTS IN A BATCH MIGRATION PLEASE PROVIDE MORE DETAIL.

A Each UNE-to-UNE batch migration request may contain a maximum of 99 accounts, each identified by a PON and an Earning Account Telephone Number ("EATN") A CLEC can, however, include a maximum of 25 end-user telephone numbers per EATN. If a CLEC has accounts of this nature in the same wire center, the CLEC could conceivably migrate as many as 2,475 end users (99 EATN X 25 TN) per batch migration.

OSS SCALABILITY

Q ARE BELLSOUTH'S OSS SCALABLE?

A. Yes, BellSouth's existing ordering OSS are scalable, and are designed to accommodate both current and projected volumes of LSRs.

The Florida KPMG Third Party Test, at Section TVV2, provided confirmation that BellSouth's ordering OSS responded effectively to normal, peak and stress volume testing. "Normal" volume was defined as 100% of projected LSR submissions, and "peak" and "stress" volumes were defined as 150% and 250% of "normal," respectively. BellSouth passed all of these test criteria.

BellSouth's commercial usage further confirms the ability of BellSouth's OSS to handle high volumes. For the three month period October through December 2003, an average number of 772,044 LSRs were submitted via the electronic ordering OSS applications. Moreover, it is important to remember, even if all UNE-P orders changed to UNE-L, that does not change the total ordering volume that BellSouth is handling very capably today.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

RF-1870
8/00

BELLSOUTH

Change Request Form

Complete and email this form to Change Control@bridge bellsouth com or Fax to BellSouth Interconnection Services at 205-321-5160 Please note that line-by-line instruction is attached for completion of this form

Internal Reference # _____(1) Date Change Request Submitted _11_/_8_/_00(2)

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

☐ **TYPE 6 (DEFECT/EXPEDITE)** OCN _____(3A)

Company Name____AT&T_____(4)

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

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

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

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

Title of Change ____UNE to UNE Bulk Migrations_____(13)

Category ☒ Add New Functionality ☐ Change Existing (14) Desired Due Date _5_/_31/00_(15)

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

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

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☒ Ordering ☒ EDI ☒ LNP ☒ LENS ☒ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☐ Software	☐ Hardware	☐ Industry Standards	☐ Defect/Expedite
☐ Product & Services	☒ New or Revised Edits	☒ Process	
☐ Documentation	☐ Regulatory	☐ Other	

Description of requested change including purpose and benefit received from this change (Use additional sheets, if necessary) (20) _AT&T would like BellSouth to implement the ability to migrate UNE to UNE orders in bulk For example, AT&T is providing service to customers with port/loop combinations (UNE-P) and wants to migrate a group of customers from UNE-P to UNE-L (BellSouth UNE loop/LNP with AT&T switch) AT&T would then send a spreadsheet/bulk migration order to BellSouth containing pertinent customer specific information An option for doing the migrations (done by another ILEC) is that BellSouth and AT&T would schedule the cuts by central office to take place over a weekend Our experience with this process has been a very low number of customer outages

RF-1870
8/00

BELLSOUTH

Change Request Form

Known dependencies (21)

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

This Section to be completed by BCCM only

Change Request Log #_____CR0215_____(23) Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status ____I_____(27)

Change Request Review Date _01/31/01_/ 04/25/01_(28)

Target Implementation Date __**3/29/03 – 3/30/03_ - Release 12.0** (29)

Last Modified By _____BCCM_____ (30) Date Modified __04/07/03_ (31)

Change Review Meeting Results (32)

12/18/00 BellSouth placed this request in Pending Status

2-5-01 Prioritized at 1-31-01 Change Review Meeting by CLEC community

3-15-01 Non-scheduled change request to be re-prioritized at 3/28/01 meeting

4-30-01 CR prioritized on 4-25-01 Refer to "Release Prioritization Ranking" on CCP Web site

2-27-02 Scheduled for Release 11 0 on 11/16/02-11/17/02

3-15-02 Draft user requirements distributed

3-25-02 UNE to UNE Bulk Migrations user requirement review to be scheduled for a later date (changed from 4-2-02) Additional information being obtained to include in the review meeting

4-10-02 Updated draft user requirements for UNE to UNE Bulk Migrations distributed User Requirement Review meeting scheduled for 4-23-02

4-23-02 User Requirements Review Meeting held EDI Technical issues are currently being investigated by BST because there are no bulk order formats in the EDI standards CR0215 may be a phased approach if it is determined that EDI can support bulk ordering EDI may not be included in the November 2002 delivery Additional information to be provided

Attachment A-1

RF-1870
8/00

BELLSOUTH

Change Request Form

5-20-02 Distributed the following information to the CLEC community BST will provide UNE to UNE Bulk Ordering for CLECs using Connect Direct only The format of the data will be non-standard, which will require CLECs to perform some coding (non-OBF, non-TCIF standard formats are necessary) The EDI Specifications required by BST to manage UNE to UNE Bulk Ordering will be a csv (comma) delimited file from the CLEC There will be no data base to create an individual 860 (SUP) Each CLEC will be required to create and manage each individual SUP New bulk specifications will be posted to the Interconnection web site six weeks prior to EDI code being placed in CAVE

6-5-02 Implementation date for Release 11 0 changed to 12/7/02-12/8/02 CAVE and Production Implementation of Release 11 0 changed to allow BST additional time to perform internal testing and CLECs additional time to test software in CAVE

6-20-02 Final user requirements distributed to the CLEC community Follow-up review meeting scheduled for July 9, 2002

7-9-02 Follow-up meeting held with the CLEC community to review the final user requirements

10-10-02 Conference call held with AT&T/BST to discuss constraints with receiving 100 LSRs (EATNs) in a single order BST can support 99 Updated user requirements will reflect this change AT&T will follow-up internally to determine if this is a major concern and will communicate this to CCP by 10/18/02 BST requested that AT&T participate in the testing effort

10-24-02 Change from 100 EATNs to 99 in a single bulk package discussed at 10-23-02 CCP meeting. Updated user requirements distributed to the CLEC community

11-7-02 CR0215 moved to Release 12 0, which is scheduled for implementation on 3/29/03-3/30/03

04/07/03 CR0215 implemented with Release 12 0 on 03/29/03

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

_____

_____

_____

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

_____

_____

_____

Agreed Release Date ___/___/___ (37)

CMVC #_____(38)

DDTS#_____(39)

Attachment A-1

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives

RF-1870
8/00

BELLSOUTH

Change Request Form

This section to be completed by BellSouth – Internal Validation of Defect/Expedite Change Request

Defect/Expedite Validation Results: (40)

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Clarification Needed ☐ Yes ☐ No

☐ Defect ☐ Expedite ☐ Feature ☐ Training Issue ☐ Duplicate ☐ Cancel

Defect/Expedite Impacts Other CLECs? ☐ Yes ☐ No

Interfaces Impacted by defect/expedite ☐ EDI ☐ TAG ☐ LNP ☐ LENS
☐ TCIF 7 ☐ TCIF 9

Target Implementation Date _____

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives

BELLSOUTH

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

CLEC Information Package

Version 2
February 18, 2004

BELLSOUTH

UNE-P to UNE-L Bulk Migration

Table of Contents

BELLSOUTH

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. Revisions

1) Following are the revisions in section 5 "Bulk Migration Options" that are enhancements to the Bulk Migration process as referenced in Carrier Notification Letter SN91083967.

- After Hours/Weekend Migrations
- Two-Hour Go Ahead Notifications for SL1 non-coordinated migrations
- Time Windows for coordinated conversions
- Pre and Post order completion restoral process (Throwback)
- Same-Day end-user account migration
- CLEC to CLEC migration (UNE-P to UNE-L)

2) Additional revisions include interval reductions in the table in section 10.1 "**Bulk Migration Project Notification Interval**"

- For a "Maximum of 99" telephone numbers the CCPM interval has been reduced from 7 business days to 4 business days
- For "100-200" telephone numbers, the CCPM interval has been reduced from 10 business days to 6 business days

UNE-P to UNE-L Bulk Migration

3. 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 Customer Care Project Manager (CCPM) 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

3.1 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

3.2 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

4. Bulk Migration 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 on Due Date –7 days, 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 Customer Care Project Manager (CCPM) 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 CCPM prior to the CLEC's placing the mechanized Bulk Request
- CLEC may specify Desired Due Dates (DDD) for each EATN The BellSouth CCPM will negotiate due dates with Network Operations Every effort will be made to accommodate the CLEC DDDs where force and load permits and minimum intervals are met
- 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

UNE-P to UNE-L Bulk Migration

CCPM

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

5. Bulk Migration Options

5.1 Order Coordination (Coordinated Hot Cut)

- Order Coordination (OC) is available in situations where there is a reuse of existing facilities for the UNE-L.
- OC is included with the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops at no additional charge
- OC is available as a chargeable option for conversions to UVL-SL1, UCL-Non Designed 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.

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UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.2 After Hours/Weekend Migrations

- Migrations will typically be completed during normal working hours of 8 a.m. – 5 p.m However, for CLECs that have customers who need cutovers completed outside of normal business hours, after hours/weekend migrations are available at the CLECs request.
- The Project Notification Form includes a column titled "Special Handling" The CLEC provides its desired "Day" and "After Hours/Weekend" time window for the selected accounts at the EATN level in the Special Handling column according to the table below.

Days	After-hours Time-Windows	Minimum Lines	Maximum Lines	Special Considerations	Add'l charges
Mon – Fri [1]	7 a m – 8 a m	10	25	NA	Per CLEC's IA[3]
Mon – Fri [1]	5 p m – 7 p m	10	50	NA	Per CLEC's IA[3]
Saturday [1]	8 a m – 5 p m	50	100	UVL-SL1 Non-Coordinated only	Per CLEC's IA[3]
Mon-Fri [2]	7 p m – 12 midnight 6 a m – 7 a m	Individual Case Basis	Individual Case Basis	CO work only – no outside dispatches	Yes Overtime

[1] Extended Basic Hours
[2] Extended Overtime Hours
[3] Interconnection Agreement

5.3 Two (2) hour Go Ahead Notification *(for Non-Coordinated Bulk Migrations)*

- For ***non-coordinated*** non-designed migrations, the CLEC will be notified within a maximum of two (2) hours of the cutover
- A Go Ahead Notification will be sent to the CLEC by facsimile* or email for UVL-SL1 and UCL-ND non-coordinated migrations
- Once the CLEC is notified of the cutover completion, the CLEC can then complete the necessary number porting activities

***Note** To change from fax to email notification, the CLEC should contact its BellSouth Local Contract Manager (LCM) and provide its Alternate Exchange Carrier Number (AECN) and email address

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.4 Time Windows for Coordinated Conversions

Time Windows for Coordinated Conversions are available for bulk migration orders at the CLEC's request as follows:

- There are two (2) time window options:
  - *8 a m – 12 p m*
  - *1 p.m. – 5 p.m*
- CLEC will submit the Project Notification form and indicate the time window desired, at the EATN level, in the Special Handling column
- Prior to the due date, the BellSouth CCPM will coordinate with Customer Wholesale Interconnection Network Services (CWINS) to ensure that CWINS and Network forces are scheduled and loaded to perform the migration in the designated 4-hour time window.
- On the due date, the coordinated cutover will take place using current provisioning processes

5.5 Pre and Post Order Completion Restoral Process (or Throwback Process)

- The restoral process (also referred to as a throwback process) is available at the CLEC's request due to out-of-service issues and when the CLEC requires a restoral/throwback back to the UNE-P service
- ***The restoral/throwback process can only occur within a twenty-four (24) hour window of the UNE-L order Due Date.***
- The CLEC will use follow the requirements in 5.5.1 or 5 5 2 or 5.5 3 below depending on whether the order is (1)coordinated/non-coordinated *completed* UNE-L order, (2)coordinated *not* completed UNE-L order; (3)non-coordinated *not* completed order:

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UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.5.1 Coordinated or Non-Coordinated '*Completed*' UNE-L order

- CLEC submits Expedited LSR to the Local Carrier Service Center (LCSC) using one of the following fax numbers
  - Birmingham Fax Server – 888-792-6271
  - Atlanta Fax Server – 888-581-6038
- The LSR Package requesting a throwback to UNE-P must contain the following information

LSR Fields	Field information
LSR Remarks	Restoral UNE-L to UNE-P
REQTYP	M
Local Service Request Page	ACT = V MI = C, D
Port Service Page	LNA = V, G FA=N UNE-P Telephone Number
Port Service Page - ECCKT Field	UNE-L associated Loop Circuit ID
Directory Listing	Fill out as any other ACT=V migration request
EXP	Y

- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.
- UNE-P Non-Recurring, Recurring and Expedite rates will be charged if applicable

5.5.2 Coordinated '*Not Completed*' UNE-L Order

- CLEC calls the CWINS Provisioning Group to request restoral/throwback to the UNE-P and if the number porting has been completed, the CLEC requests port-back activity
- Refer to the **CWINS Location and Hours** web site for CWINs telephone numbers
- Orders will be placed in Missed Appointment (MA) status
- CLEC submits supplemental (sup) order to cancel or reschedule conversion request
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV)
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.5.3 Non-Coordinated *'Not Completed'* UNE-L order

- CLEC emails CWINS Enhanced Delivery (EnDI) Group to request restoral/throwback
- CWINS EnDI email address is cwins.lnp@bellsouth com
- Orders will be placed in MA status
- If the number porting has been completed, the CLEC will call the Fleming Island LCSC Call Center at 800-872-3116 to request port-back activity before the CLECs submits a sup order.
- LCSC will advise the CLEC of port-back process
- CLEC submits sup order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV)
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request

5.6 Same-day End-user Account Migrations

Same day End-user Account Migrations are available upon CLEC request. Same day end-user account migration means that all lines associated with an end-user from the same Serving Wire Center will be assigned the same due date

- CLEC will group the same end-user accounts together on the Project Notification form
- CLEC will submit the Project Notification form and indicate the same Due Date desired, at the EATN level, in the Special Handling column
- The BellSouth CCPM will coordinate with the appropriate internal groups to ensure that all end-user account migration activity is performed on the same due date.

5.7 CLEC to CLEC Migration of UNE-P to UNE-L

This process is available with the Bulk Migration process as follows

- CLEC (CLEC A) to CLEC (CLEC B) Migration of UNE-P to UNE-L is defined as a facility based CLEC (CLEC B) that is migrating the UNE-Ps, previously held by another CLEC (CLEC A), to UNE-Ls
- CLEC B will prepare the Project Notification form using the same Bulk Migration requirements as specified within this document
- The Project Notification form must contain all the necessary UNE-P and UNE-L information according to the requirements of the form
- CLEC B must have an end-user letter of authorization (LOA) on file (it must be available if requested)

UNE-P to UNE-L Bulk Migration

6. 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	BellSouth CCPM 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 BellSouth CCPM receives corrected Project Notification from the CLEC and continues the negotiation process
3	BellSouth CCPM 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 BellSouth CCPM, 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

UNE-P to UNE-L Bulk Migration

7. 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 Customer Care Project Manager (CCPM) For help with identifying a BellSouth CCPM , the CLEC should contact its BellSouth Customer Support Manager
- The BellSouth CCPM 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 CCPM will coordinate with BellSouth's field forces to schedule the migration Due Dates
- Once the review with the field forces is complete, the BellSouth CCPM 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 CCPM

UNE-P to UNE-L Bulk Migration

8. 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 Port, 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

9. 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

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UNE-P to UNE-L Bulk Migration

10 Intervals

10.1 Bulk Migration Project Notification Interval

- The "CCPM *Targeted Response Interval*" column in the table below represents the targeted number of business days in which the BellSouth CCPM 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 BellSouth Customer Care 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 BellSouth CCPM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

# of end-user Tel Numbers	CCPM 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	4 business days	3 business days	14 business days	21 business days
100-200	6 business days	3 business days	14 business days	23 business days
201 +	To be determined	3 business days	14 business days	Contact CCPM

10.2 Bulk Request Service Order Intervals

- The BellSouth CCPM 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

10.3 Example of Intervals

An example of Intervals follows:

- March 1, 2004 - CLEC submits Project Notification with 87 end-user telephone numbers to the BellSouth CCPM
- March 5, 2004 (4 business days) – the BellSouth CCPM sends the Project Notification with firm Due Dates to the CLEC
- March 8 – March 10 (3 business days) – CLEC will prepare and submit mechanized Bulk Request via the electronic interface
    - March 30, 2004 (14 business days) – the earliest assigned Due Date on the Project Notification returned to the CLEC

UNE-P to UNE-L Bulk Migration

11. Acronyms

AECN	Alternate Exchange Carrier Number
ADSL	Asymmetrical Digital Subscriber Line
BOPI	Bulk Order Package Identifier
CCPM	Customer Care Project Manager
CHC	Coordinated Hot Cut
CLEC	Competitive Local Exchange Carrier
CWINS	Customer Wholesale Interconnection Network Services
DDD	Desired Due Date
EATN	Existing Account Telephone Number
EnDI	Enhanced Delivery
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
PON	Purchase Order Number
RESID	Reservation Identification
RSAG	Regional Street Address Guide
SUP	Supplemental
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

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF KATHY K BLAKE

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 03-00526

FEBRUARY 27, 2004

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

A My name is Kathy K. Blake. I am employed by BellSouth as Director – Policy Implementation for the nine-state BellSouth region My business address is 675 West Peachtree Street, Atlanta, Georgia 30375

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

A I graduated from Florida State University in 1981, with a Bachelor of Science degree in Business Management. After graduation, I began employment with Southern Bell as a Supervisor in the Customer Services Organization in Miami, Florida. In 1982, I moved to Atlanta where I have held various positions involving Staff Support, Product Management, Negotiations, and Market Management within the BellSouth Customer Services and Interconnection Services Organizations. In 1997, I moved into the State Regulatory Organization

where my responsibilities included issues management and policy witness support. I assumed my current responsibilities in July 2003.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide an overview of the testimony BellSouth presents in support of its batch hot cut process and to discuss the requirement set out by the Triennial Review Order[1] for state commissions to adopt and implement a batch hot cut process. I also provide BellSouth's position regarding the appropriate rate for batch hot cuts in connection with the Tennessee Regulatory Authority's ("Authority" or "TRA") determination of markets in which CLECs are not impaired within the meaning of the Telecommunications Act of 1996 (the "Act") without access to unbundled local circuit switching Other issues related to ILEC unbundled switching requirements are being addressed in Docket No. 03-00491.

Q. IN THE *TRO*, WHAT DID THE FEDERAL COMMUNICATIONS COMMISSION ("FCC") REQUIRE STATE COMMISSIONS TO DO WITH RESPECT TO HOT CUTS?

A. The FCC held that the state commissions must adopt and implement a batch hot cut process within 9 months of the effective date of the Order *See TRO* ¶423

[1] *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, et al*, CC Docket No 01-338, et al., *Report and Order and Order on Remand an Further Notice of Proposed Rulemaking*, FCC 03-36, released August 21, 2003 ("*TRO*")

("specifically, we ask the state commissions, within nine months of the effective date of this Order, to approve and implement a batch cut migration process – a seamless, low-cost process for transferring large volumes of mass market customers – or to issue detailed findings that a batch cut process is unnecessary in a particular market because incumbent LEC hot cut processes do not give rise to impairment in that market."), 47 C.F.R. 51.319(d)(2)(ii) ("the state commission *shall*. establish an incumbent LEC batch cut process.. "). Thus, at the conclusion of this proceeding, the Authority must order a batch hot cut process.

Q PLEASE GIVE AN OVERVIEW OF BELLSOUTH'S TESTIMONY ADDRESSING "HOT CUTS".

A. BellSouth will present testimony showing that an efficient hot cut process is in place, enabling competitors to compete by obtaining access to BellSouth's unbundled loops and using either the competitors' own switches or wholesale switching. Further, BellSouth will present testimony demonstrating that BellSouth has a seamless and effective batch hot cut process in place that enables competitors to convert existing Unbundled Network Element – Port/Loop Combination ("UNE-P") lines to unbundled loops and switching that is not provided by BellSouth Additionally, even though BellSouth's existing batch cut process is efficient and seamless, and meets the obligations of the TRO, BellSouth will present testimony demonstrating that it has responded to CLEC requests and developed a mass migration conversion process.

Q. WHO ARE THE BELLSOUTH WITNESSES THAT WILL TESTIFY ABOUT THE HOT CUT PROCESS?

A. There are a number of witnesses. Mr. Ken Ainsworth explains BellSouth's hot cut process that handles both the migration from a BellSouth retail customer to an Unbundled Network Element – Loop ("UNE-L") terminating in a CLEC's collocation space and the migration of a UNE-P to a UNE-L. Mr Ainsworth also addresses BellSouth's seamless and cost-effective batch hot cut process as well as the ability of BellSouth's centers to manage the volume of hot cuts that may need to be performed if local circuit switching is no longer a UNE.

Mr. Ron Pate provides testimony that explains the ordering process BellSouth has developed for UNE-P to UNE-L Bulk Migration/batch hot cut process when CLECs migrate existing multiple UNE-P customers to UNE-L.

Mr. Al Heartley testifies that the BellSouth Network Services organization is prepared to handle the batch hot cut process as well the volume of hot cuts that may need to be performed if local circuit switching is no longer a UNE.

Mr. Milton McElroy provides testimony that presents evidence that BellSouth's Bulk Migration Process of moving UNE-Ps to UNE-Ls is both seamless and effective. The evidence is based upon testing performed by PriceWaterhouseCoopers Mr. McElroy will also provide testimony that presents the mass migration conversion process.

Given the simple process, it should be clear that BellSouth can perform hot cuts in sufficient volumes, and with sufficient speed and accuracy, to allow CLECs to compete using UNE-L. BellSouth's witnesses will demonstrate that BellSouth absolutely can execute hot cuts in this manner, and as Mr. Varner will explain, BellSouth's performance measurements and data demonstrate its ability to do so.

Q. IS THE ISSUE OF HOT CUTS COMPLEX?

A. No The hot cut case is simple because it involves a process that has been around for 100 years – moving a jumper from one location to another. BellSouth can do it, AT&T can do it, and MCI can do it. As of November 2003, there are 35,132 lines in Tennessee served by a combination of a BellSouth unbundled loop (SL-1, SL-2 and UCL-ND) and a CLEC's switch, which demonstrates without doubt that BellSouth has a hot cut process that works

The case is also simple because it is familiar to the Authority. The Authority expended a great deal of time and energy reviewing the provisioning of hot cuts in the Section 271 case (Docket No. 97-00309) and participating in the recent Authority sponsored workshop in this Docket. That work will inform and facilitate its decision-making in this case.

Q WHAT WAS THE AUTHORITY'S DETERMINATION WHEN IT PREVIOUSLY REVIEWED THE ISSUE OF BELLSOUTH'S HOT CUT PROCESS?

A The Authority reviewed BellSouth's hot cut process during BellSouth's 271 proceeding and UNE Cost proceeding. In Docket No. 97-00309 the Authority determined that BellSouth met the requirements of Section 271 of the Act. In the UNE Cost proceedings (Docket Nos 97-01262 and 00-00544), the Authority approved the TELRIC-based nonrecurring rates applicable to hot cuts.

Q. GIVEN THE AUTHORITY'S EXTENSIVE EXPERIENCE WITH HOT CUTS, WHY IS BELLSOUTH DEVOTING SO MUCH TESTIMONY TO THIS ISSUE?

A BellSouth would prefer not to do so. However, when faced with the overwhelming evidence regarding actual facilities-based competition that exists in Tennessee and the geographic areas where the FCC's triggers are met, the CLECs are likely to want to divert the Authority's attention by focusing on the hot cut process. When faced with this straightforward issue, the CLECs have resorted to delay and obstruction. For example, in New York's Bulk Migration/Hot Cuts proceeding (Case No. 02-C-1425), in an obviously circular argument, AT&T contended that "until Verizon demonstrates that it can execute a hot cut process at high volumes, we do not have a process that can handle mass market volumes in a post UNE-P world " (Falcone Testimony, Case No. 02-C-1425, filed October 24, 2003, at p 78.) Of course, so long as UNE-P exists, CLECs have no incentive to order UNE-L, making AT&T's purported threshold impossible to meet. To further delay, AT&T has argued that state commissions must first adopt a hot cut process, but "refrain from approving those processes until appropriate metrics have been developed and approved." (Nurse Testimony, Case No. 02-C-1425,

filed October 24, 2003, at pp. 8-9.) AT&T, of course, is counting on months of delay from extended negotiations about performance measures

To complicate and obscure the straightforward issue, certain CLECs, and specifically AT&T in proceedings before the FCC, have argued, and will probably argue here, that, until BellSouth makes changes to its network that would cost billions of dollars, no adequate hot cut process is possible. An adequate process, according to AT&T, will require "some form of electronic, not manual, loop provisioning." The FCC already rejected AT&T's proposal, but BellSouth anticipates with near certainty that AT&T intends to advance this very same tired old argument again. The CLECs' suggestion that BellSouth must overhaul its existing network to provide electronic loop provisioning prior to a state commission finding that BellSouth, or any ILEC, has an adequate hot cut process, whether "batch" or otherwise, is what the Authority can expect to hear As a result, BellSouth offers extensive testimony from Messrs. Ainsworth, Varner, Pate and Heartley regarding the hot cut issues to demonstrate that nothing more is necessary

Q. WHAT RATES DOES BELLSOUTH PROPOSE FOR THE BULK MIGRATION HOT CUT PROCESS?

A. In the *TRO*, the FCC suggested that the batch hot cut rates "should reflect the efficiencies associated with batched migration of loops to a competitive LEC's switch, either through a reduced per-line rate or through volume discounts " (*TRO* ¶ 489) For batch hot cuts, BellSouth proposes a 10% discount of the total

amount of the TRA approved nonrecurring UNE rates of the elements applicable for individual hot cuts.[2] Based on a recent cost study, BellSouth determined that the nonrecurring cost for certain elements in connection with the batch hot cut process is actually lower than the ordered rate with the 10% discount. For those elements where the batch hot cut cost study results are lower than the discounted rate, BellSouth proposes to charge the CLECs the lower rate produced by the cost study. Attached is Exhibit KKB-1 that provides the rates BellSouth proposes for its batch hot cut service.

Q. DO UNE LOOP NONRECURRING CHARGES CONSTITUTE AN ECONOMIC BARRIER?

A. No. The Authority approved the UNE loop prices currently charged by BellSouth in the UNE Cost proceeding. BellSouth's proposal to offer a 10% discount off these nonrecurring prices when CLECs use the batch hot cut process is an incentive for CLECs to use that process. The mass migration conversion process discussed by Mr McElroy provides discounted rates as well.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

(#521821)

[2] BellSouth will apply the net 10% discount to the Service Level 1 (SL1) loop, the Service Level 2 (SL2) loop and the Unbundled Copper Loop - Non-designed (UCL-ND) nonrecurring rate.

BellSouth Telecommunications, Inc
TRA Docket No 03-00526
February 27, 2004
Exhibit KKB-1

TENNESSEE - Nonrecurring Rates

		Current Rates		Proposed BHC Rates	
Cost Ref. No	**Rate Elements**	**First Loop**	**Addtl Loop**	**First Loop**	**Addtl Loop**
SL1 Loop with Order Coordination					
A 1 1	SL1 Loop NRC	$31 99	$20 02	$24 37	$13 60
A 1 3	Order Coordination	$36 52	$36 52	21 99**	7 21**
	Electronic Service Order*	$0 00	$0 00	$0 00	$0 00
H 0	2-Wire Cross Connect	$7 68	$7 68	$7 68	$7 68
	TOTAL SL1 Loop Hot Cut	***$76 19***	***$64.22***	**$54 04**	**$28 49**
SL2 Loop (Order Coordination included in Loop NRC)					
A 1 2	SL2 Loop NRC	$75 06	$48 20	$66 79	$42 61
	Electronic Service Order*	$0 00	$0 00	$0 00	$0 00
H 0	2-Wire Cross Connect	$7 68	$7 68	$7 68	$7 68
	TOTAL SL2 Loop Hot Cut	***$82 74***	***$55 88***	**$74 47**	**$50 29**
UCL-ND with Order Coordination					
A 13 12	UCL-ND Loop NRC	$31 99	$20 02	$24 37	$13 60
A 1 3	Order Coordination	$36 52	$36 52	21 99**	7 21**
	Electronic Service Order*	$0 00	$0 00	$0 00	$0 00
H 0	2-Wire Cross Connect	$7 68	$7 68	$7 68	$7 68
	TOTAL UCL-ND Loop Hot Cut	***$76 19***	***$64 22***	**$54.04**	**$28 49**

Notes *OSS charges included in the NRC of the UNE loop
** Rate based on batch hot cut cost study results

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF MILTON MCELROY JR.

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 03-00526

FEBRUARY 27, 2004

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

A. My name is Milton McElroy Jr. My business address is 575 Morosgo Drive, Atlanta, Georgia 30324. My title is Director – Interconnection Services

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE WITH BELLSOUTH.

A. I have over fifteen years experience in the telecommunications industry. My experience includes various engineering, operations and staff assignments at BellSouth. I earned a Bachelor of Science degree from Clemson University in Civil Engineering in 1988 and a Master's degree in Business Administration from Emory University in 2001. Additionally, I am a registered Professional Engineer in Alabama, North Carolina, and South Carolina.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to demonstrate that BellSouth's Bulk Migration Process of Unbundled Network Element Platform ("UNE-P") service to unbundled loop ("UNE-L") service is both seamless and effective as required by the TRO, as well as describe how BellSouth's Mass Migration process exceeds the requirements of the TRO. To corroborate these facts, BellSouth engaged PricewaterhouseCoopers ("PwC") to provide an attestation on the effectiveness of BellSouth's batch process. PwC's work was twofold: first, PwC observed a test of the Bulk Migration Process using a pseudo Competitive Local Exchange Carrier ("CLEC"); second, PwC observed a number of live UNE-L migrations or hot cuts in several states. The test corroborates the testimony of BellSouth's witness, Mr. Ken Ainsworth, that BellSouth provides a proven, seamless, high quality individual hot cut process to handle the UNE-L volumes that would likely result if BellSouth were to obtain full relief from unbundled circuit switching; and that BellSouth provides a batch hot cut process that offers additional ordering and provisioning efficiencies to enhance the same proven, seamless, quality migrations that are currently associated with individual hot cuts. This process will sufficiently support the batch conversion of a CLEC's embedded UNE-P customer base to UNE-L services.

Additionally, even though BellSouth's existing batch process is efficient and seamless, and meets the obligations of the TRO, BellSouth has responded to CLEC requests, and developed a mass migration conversion process.

Q. WHY DID BELLSOUTH ENGAGE PwC TO TEST ITS BULK MIGRATION PROCESS?

A. BellSouth introduced its batch migration process to the CLEC community in March 2003. Despite their expressed interest in having such a process, not a single CLEC took advantage of it in the months following its introduction. Therefore, BellSouth had no significant commercial data with which to demonstrate the efficiency and viability of the Bulk Migration Process other than the extensive performance data demonstrating the effectiveness of its individual hot cut process. BellSouth engaged PwC to perform an independent third party test. BellSouth selected PwC because of PwC's work in conducting regionality testing as part of BellSouth's 271-approval process, which the Federal Communications Commission ("FCC") relied upon in granting BellSouth 271 relief.

Q. WHAT TYPE OF TEST DID PwC CONDUCT?

A. After discussions with PwC about the testing concept, BellSouth engaged the firm to conduct an attestation examination whereby PwC would examine two BellSouth assertions concerning its Bulk Migration Process. PwC conducted the examination in accordance with "attestation standards" established by the American Institute of Certified Public Accountants ("AICPA"). An "attestation engagement" occurs when a practitioner, such as PwC, is engaged to issue a written statement as to whether or not the written assertion of another party, such as BellSouth, is reliable. Under the AICPA attestation standards, a statement resulting from such an examination is the highest level of assurance that can be provided on an assertion and, if positive, results in an opinion by the practitioner, PwC, that the original assertions have been found to be fairly and accurately

stated in all material respects. To put this in more simple terms applicable to this test, BellSouth made two claims (assertions) and PwC validated the claims with the opinion that they express in their report (Report of Independent Accountants).

Q. WHAT WERE BELLSOUTH'S ASSERTIONS?

A. BellSouth's assertions, as well as the PwC opinions, can be found in Exhibit MM-1, BellSouth Telecommunications Inc 's Report on the BellSouth Bulk Migration and Regional Tests, December 22, 2003. This exhibit contains a collection of reports as well as a description of the Bulk Migration Test The outline of the report package can be found on the Table of Contents page. The outline of the report is as follows:

I. **Report of Independent Accountants for BellSouth Telecommunication's Bulk Migration Process**—this report was issued by PwC after they observed the bulk migration test associated with BellSouth's first assertion They concluded and opined that the Bulk Migration Process would enable a CLEC to bulk migrate its customer base from UNE-P to UNE-L. PwC found a few deviations which can be seen on the following page of the report titled Attachment A and which will be discussed later.

II. **Management Assertions on BellSouth Telecommunication's Bulk Migration Process**—this report is BellSouth's first assertion. PwC validated this assertion with their Report of Independent Accountants in section I. The same list of deviations is provided in Attachment B of the report to the BellSouth Assertion on Bulk Migrations

III. **Report of Independent Accountants for BellSouth Telecommunication's Hot Cut Process**—PwC issued this report after the firm observed hot cuts across the BellSouth region for the second BellSouth assertion. They concluded and opined that the hot cut provisioning process is the same when using the Bulk Migration Process or when using the single order migration process across the BellSouth region. PwC found a few deviations which can be seen in Attachment C of the report and which will be discussed later

IV. **Management Assertions on BellSouth Telecommunication's Hot Cut Process**—this report is BellSouth's second assertion. PwC validated this assertion with their Report of Independent Accountants in section III. The same list of deviations is provided in Attachment D of the report to the BellSouth Assertion on the Regional Test.

Supplementary Information

V. Executive Overview
- A Overview of Reports
- B Objective of Supplementary Test Information

VI. Bulk Migration and Regional Test

VII Glossary of Terms

Sections V, VI, and VII of the report provide an overview of the assertions and a description of the test that was conducted in Florida along with a description of the live hot cut testing across the BellSouth region.

BellSouth made two assertions. First, BellSouth asserted that its Bulk Migration Process enables a CLEC to migrate multiple end-users from UNE-P service to UNE-L service. In order to facilitate the test, BellSouth created a pseudo-CLEC. Use of the pseudo-CLEC is an established methodology that has been utilized in other process tests. The pseudo-CLEC was established and operated similar to the methodology engaged during the 271 Third Party Tests that were conducted in Florida and Georgia The pseudo-CLEC submitted multiple bulk order requests following the written procedures provided to the CLECs on the website. Details about BellSouth's batch hot cut process can be found on-line at http //www.interconnection bellsouth.com/guides/unedocs/BulkManpkg pdf.

The PwC examination of the Bulk Migration Process included a review of all the process steps. PwC began with a review of the project notification that would be

submitted by the CLEC, and then reviewed the associated activities of the BellSouth Project Manager. Once all the pre-ordering type of activities was completed, PwC reviewed the activities associated with the ordering process. They observed the pseudo-CLEC submissions and the activities associated with BellSouth's ordering systems and the Local Carrier Service Center ("LCSC") Next, PwC reviewed the traditional provisioning processes including those of BellSouth's Customer Wholesale Interconnection Network Services Center ("CWINS") as well as BellSouth Central Office and Field Technicians. The review of these processes for BellSouth's first assertion was very comprehensive as evidenced by the quantity of time and number of individuals utilized by PwC in testing.

Second, BellSouth asserted that the Bulk Migration Process requires central office and field technicians to physically perform the hot cut process. This hot cut process is the very same process used for non-bulk or individual hot cuts in BellSouth's nine-state region. In spite of the multiple hot cut offerings, the act of performing a hot cut remains a simple, straightforward task – and one that BellSouth performs at high volumes with a high degree of accuracy and speed. Therefore, BellSouth made the assertion that the hot cut process is used for both bulk hot cuts as well as individual hot cuts across the region served by BellSouth. PwC validated the process used across BellSouth's region by observing central office and field forces using the same hot cut process described in BellSouth's second assertion in Exhibit MM-1.

Q. WHAT DID PwC USE AS CRITERIA FOR DETERMINING DEVIATIONS AS THEY VALIDATED THE TWO BELLSOUTH ASSERTIONS?

A. PwC expresses their threshold for deviation reporting in the affidavit of Mr. Paul M Gaynor of PwC, which can be seen in Exhibit MM-2 The affidavit was prepared to provide additional detail for the types of testing procedures used by PwC during the attestation examinations. It also provides criteria for the threshold testing beginning with paragraph 10, on page 6 of Exhibit MM-2. Their threshold or criteria transcends into three categories:

1 Adherence to each process step in excess of 95% of the time.
2. Any impact to customer service that exceeded 15 minutes.
3 Any observation that actually met the first two criteria, but PwC determined that the action (i e., a particular process step) was critical, thus it should be reported anyway.

These categories of criteria will be further explored as each deviation is described and addressed

BellSouth's First Assertion

Q. HOW DID BELLSOUTH ESTABLISH THE PSEUDO-CLEC FOR THE FIRST ASSERTION OF THE TEST?

A. BellSouth created the pseudo-CLEC by establishing approximately 750 UNE-P accounts in three (3) wire centers in Florida for the test. Florida was chosen as

the test location because it has the highest number of embedded UNE-P customers and it was projected to be the first state to experience extensive CLEC utilization of the Bulk Migration Process BellSouth designed the test bed to mirror actual facility distribution and the makeup of existing UNE-P accounts. BellSouth wanted to ensure that the outside plant facilities assigned to the test bed circuits would mirror the actual distribution of facilities within the state. An evaluation of Florida's existing facility usage revealed that approximately 50% of circuits were served by copper facilities, 14% were served by Universal Digital Loop Carrier ("UDLC") and 36% were served by Integrated Digital Loop Carrier ("IDLC") BellSouth wanted its test bed to reflect the actual make-up of existing UNE-P accounts in terms of service type or class of service. BellSouth obtained and analyzed the data associated with establishment of UNE-P service for actual customers. The data indicated that the test bed should consist of 85% residential accounts, 10% business, 3% coin, and 2% Remote Call Forwarding ("RCF"). The latter class of service was further broken down into residential and business RCF products. These classes of service are consistent with the UNE-P requirements listed on page 9 of the Bulk Migration Process CLEC Information Package that can be found on-line at http://www interconnection bellsouth.com/guides/unedocs/BulkManpkg pdf.

Next, BellSouth simulated a CLEC switch by wiring from the originating equipment ("OE") block on the BellSouth frame in each central office to the CLEC Connecting Facility Assignment ("CFA") block to establish dial tone for the pseudo-CLEC switch. This methodology was employed for accounts containing telephone numbers ("TNs") served by copper and UDLC facilities. IDLC facilities

do not have a physical appearance on the BellSouth frame so a second set of TNs was established and wired as described above. This second set of TNs was mapped to the TNs served by IDLC to enable all normal conversion activities to occur. This approach also allowed for the conversion from IDLC to copper or UDLC facilities during the test.

There was one step in the provisioning process that BellSouth was not able to complete. Because the CLEC switch was simulated, BellSouth could not send any messages to the Network Portability Administration Center ("NPAC"), which cause the number port to occur. In other words, BellSouth could not actually move the UNE-P TN from the BellSouth switch to the CLEC switch because in the simulated environment, there was no CLEC switch. The absence of this step did not materially impact the testing of BellSouth's Bulk Migration Process since the CLEC itself initiates and largely controls the routing change associated with moving the circuit from BellSouth's switch to its own. All other BellSouth and CLEC ordering and provisioning procedural steps were followed, completed, and observed by PwC during the course of the test.

Q. HOW MANY AND WHAT TYPES OF BULK MIGRATION HOT CUTS DID BELLSOUTH PERFORM TO CONFIRM THE FIRST ASSERTION OF THE TEST?

A BellSouth reviewed its existing base of UNE-L accounts to determine the actual class of service make-up. The analysis indicated that approximately 87% of actual UNE-L migrations were for Service Level One ("SL1") voice grade loops

while 7% of the UNE-L migrations were for Service Level Two ("SL2") voice grade loops The remaining 6% were distributed across the other designed and non-designed UNE-L classes of service. This data, combined with the list of classes of service to which UNE-Ps may migrate, guided BellSouth in issuing migration orders that were distributed based on the embedded base, yet covered all "migration-permissible" loop types A list of loop types to which UNE-Ps may be migrated is found on page 9 of the Bulk Migration Process CLEC Information Package. The test included both central office and field cuts. As previously indicated, since 85% of the embedded base of UNE-P accounts consists of residential classes of service, most of the hot cuts were ordered as non-coordinated. The test was structured and conducted as follows

- Day 1 of Testing on December 2, 2003—West Hollywood Central Office (total of 125 Hot Cuts)
  The first day of testing was based upon four Bulk Migration Project Notifications or Bulk Order Project Identifiers ("BOPIs"). These four (4) BOPIs accounted for 124 migrations using the Bulk Migration Process and an additional migration was conducted via the submission of single Local Service Requests ("LSRs"). The end result was that there were a total of 125 hot cuts on the first day of testing.

- Day 2 of Testing on December 4, 2003—Arch Creek Central Office (total of 125 Hot Cuts)
  The second day of testing was based upon six (6) BOPIs. These six (6) BOPIs accounted for 119 bulk migrations, and six (6) single migrations were included to reach the test target of 125 hot cuts.

- Day 3 of Testing on December 5, 2003—Perrine Central Office (total of 125 Hot Cuts)
  The third day of testing was based upon three (3) BOPIs. These three (3) BOPIs accounted for 108 bulk migrations and 17 single migrations were included to reach the test target of 125 hot cuts.

- Day 4 of Testing on December 11, 2003—West Hollywood, Arch Creek and Perrine Central Offices (total of 383 Hot Cuts)
  The fourth day of testing was based upon a total of five (5) BOPIs

for West Hollywood, three (3) BOPIs for Arch Creek, and seven (7) BOPIs for Perrine The 5 BOPIs in West Hollywood accounted for 125 bulk migrations. Additionally, there were two (2) single migrations in West Hollywood for a total of 127 hot cuts. The three (3) BOPIs in Arch Creek accounted for 126 bulk migrations, and there were also five (5) single migrations in Arch Creek for a total of 131 hot cuts The seven (7) BOPIs in Perrine accounted for 122 bulk migrations and three (3) additional single migrations, which resulted in a total of 125 hot cuts.

The target number of bulk migrations for each of the first three (3) test dates was 125, while the fourth date was designed to test simultaneous provisioning in all three (3) central offices The end result was that BellSouth completed a total of over 375 migrations on the fourth date. Therefore, over 750 hot cut migrations occurred across the four days of testing with 724 of those resulting from bulk migration service requests Coincidentally, since the inception of the test, BellSouth has had the opportunity to migrate more than 125 UNE-P accounts for an actual large CLEC that operates in Florida. The testimony of Mr. Ken Ainsworth addresses this effort in greater detail.

Q. PLEASE DISCUSS THE FINDINGS FROM THE TEST ON THE FIRST ASSERTION.

A. PwC validated Bellsouth's first assertion by observing bulk migration hot cuts The details of PwC's findings can be found in their Report of Independent Accountants in Exhibit MM-1 In summary, PwC observed a total of 724 bulk hot cuts during the four days of bulk migration testing. In its Report of Independent Accounts for the first assertion, PwC provided a positive confirmation of BellSouth's first assertion with the qualification of some deviations. These

deviations require further review and explanation; however, it is important to keep the deviations and their impact in an appropriate context. PwC observed 724 bulk hot cuts during the four (4) test days. The following paragraphs provide an explanation of the deviations found in testing BellSouth's first assertion and its impact to the customer:

First Assertion, Deviation 1—this deviation resulted when the BellSouth technician could not ANAC (Automatic Number Announcing Circuit) the BellSouth dial tone prior to the cut for three (3) of the 724 bulk migrations. ANAC is a capability allowing a technician to plug a test set onto a given loop, dial a special code and have played out audibly the telephone number currently assigned to that loop After investigating and resolving the issue, which took approximately 40 minutes for each dial tone, the technician was able to restore the dial tone through the BellSouth switch. The hot cut was then successfully completed. Although both BellSouth and CLECs strive for perfection, occasionally there may be an issue with the dial tone from either switch on the day of the hot cut Therefore, it is imperative that BellSouth have procedures in place to resolve these types of issues. These three (3) cuts demonstrate that BellSouth does have the procedures and ability to resolve issues, and complete successful migrations. PwC listed this as a category 2 deviation where customer service was impacted for over 15 minutes on the three hot cuts in question.

First Assertion, Deviation 2—this deviation resulted after PwC observed 3 of the 724 bulk migrations that took longer then 15 minutes. There was one (1) hot cut that took 20 minutes while two (2) other hot cuts took approximately 40 minutes.

In these cases, the BellSouth field technician encountered and resolved an issue involving an electronic cross-connect in a remote terminal. This situation extended the hot cut's completion time by a few minutes. PwC listed this as a category 2 deviation where customer service was impacted for over 15 minutes on the three hot cuts in question.

First Assertion, Deviation 3—there were two (2) of the 724 bulk migrations where BellSouth technicians failed to successfully complete hot cuts. In the first case, BellSouth performed the migration prior to the due date so the end user customer would have been able to make calls, but not receive calls. The second case resulted from the migration not being performed on the due date. In this case, the end user customer could have potentially lost service. BellSouth has a thorough process that provides for contingencies to ensure that the risk of interruption of service to the customer is minimized, but occasionally failures do occur as demonstrated in the test. PwC listed this as a category 2 deviation where customer service was impacted for over 15 minutes on the two hot cuts in question.

These first three (3) deviations constitute PwC findings for the impact to customer service that exceeded 15 minutes. There were a total of eight (8) instances during the 724 bulk migrations. The genesis of this 15 minute benchmark is the Service Quality Measurement ("SQM") on the timeliness of coordinated conversions where this Commission has established a benchmark of 95% within 15 minutes. Thus, BellSouth's performance during the test translates to 98.9%, which exceeds the Commissions benchmark.

First Assertion, Deviation 4—this deviation resulted when BellSouth field technicians were completing IDLC conversions in a field remote terminal. The technician was unable to ANAC the BellSouth dial tone for 19 lines This issue or deviation was an artifact of the test resulting from the two (2) TNs needed for all IDLC served UNE-Ps. In live customer conversions, only one (1) TN is involved, thus this situation would not have occurred. This deviation did not have any negative impact to the migration; the 19 hot cuts were still successfully completed within the allotted 15 minute time period. PwC listed this as a category 3 deviation where the issue would not be considered reportable via the first two (2) threshold categories, but PwC elected to report the issue as a deviation to ensure that it was visible to the reader.

First Assertion, Deviation 5—this deviation resulted when the central office technician did not completely follow the process for one (1) of the 724 bulk hot cuts. In this case, the technician found that the BellSouth jumper wire had the wrong TN, but the CLEC jumper wire had the correct TN. The technician should have contacted the CWINS center, which would have contacted the CLEC to confirm the TN and obtain the CLEC's permission to proceed with the cut These contacts did not occur. In the end, the hot cut was successfully made with the correct TN, but the deviation was noted due to a process step miss. PwC listed this as a category 3 deviation where the issue would not be considered reportable via the first two (2) threshold categories, but PwC elected to report the issue as a deviation to ensure that it was visible to the reader.

First Assertion, Deviation 6—this deviation resulted when PwC observed a total of six (6) instances in which BellSouth technicians missed a hot cut process step. More specifically, on Day 2 of the test, PwC observed that the BellSouth technician neglected to test the CLEC dial tone prior to performing the hot cut for six (6) telephone numbers These were certainly process step omissions; however, the process contains several safeguards to ensure that the hot cuts are successfully executed That was the case on these six (6) observations; these inadvertent step omissions did not negatively impact the ultimate success of all six (6) of the conversions. PwC listed this as a category 3 deviation where the issue would not be considered reportable via the first two (2) threshold categories, but PwC elected to report the issue as a deviation to ensure that it was visible to the reader.

First Assertion, Deviation 7—this deviation resulted when a minor system issue was identified during the test while submitting bulk LSRs. The issue is not considered material since no CLEC has actually bulk ordered the associated products. The Bulk Migration test included an evaluation of the electronic LSR submission process. Using this process, the pseudo-CLEC successfully submitted LSRs resulting in BellSouth's ordering systems generating 724 bulk migrations There are two circumstances under which a bulk LSR cannot be submitted into BellSouth's ordering systems. The first circumstance involves the bulk migration to a UNE-L service known as a non-designed 2-Wire Unbundled Copper Loop or UCL-ND. The second circumstance involves the bulk migration of Remote Call Forwarding UNE-P services. BellSouth can in fact perform migrations for both of these service types via single migration; however, the

Universal Service Order Codes ("USOCs") associated with these products cannot be submitted on bulk LSRs. If a CLEC needed to order the migration of either of these products, it would simply submit single LSRs. It should be emphasized that these two (2) products constitute less than 2% of the service types within BellSouth's embedded base of services. Therefore, this particular issue would have minimal impact on CLEC customers and is not material to BellSouth's overall ability to successfully perform bulk migrations of services commonly used by CLECs. BellSouth has targeted the UCL-ND issue correction to occur in Release 15.0 in March of 2004, while the RCF issue is currently under investigation RCF is a unique product that does not have an actual loop in the service. BellSouth is considering the removal of this product from the Bulk Migration Process since it is targeted for the migration of services that involve loops. Once again, it is important to put the magnitude of this system issue into context particularly since no CLECs have attempted to bulk order migrate these two service types PwC listed this as a category 1 deviation where adherence to the process did not occur at least 95% of the time. Considering the embedded base of these products and the fact that no CLEC has ever ordered the products via the Bulk Migration Process, clearly there is no material impact to operational CLECs.

First Assertion, Deviation 8—this deviation resulted due to poor performance observed on the first day of testing with BellSouth's Enhanced Delivery Initiative ("ENDI") system. For non-coordinated hot cuts, this system sends an electronic notification (commonly called a "go ahead") to inform the CLEC that BellSouth has completed the hot cut. This notification is the signal for the CLEC to begin

their porting process with NPAC. BellSouth witness, Mr. Ken Ainsworth, provides a detailed description of this system in his testimony. During the first day of testing, ENDI experienced an issue with a corrupt downstream server There were two (2) servers that should have been submitting the notices to the pseudo-CLEC. The corrupted server was not sending messages, thus the failure occurred and the deviation was noted. BellSouth corrected the server problem on December 3, 2003 As is evidenced by PwC's observations, the system was fixed and no failures were observed on the second and third days of testing. There was one (1) notice for a two-line service order that was not submitted on day four of testing. This failure resulted from an issue of completing the work order step in ENDI, which prevented the notice from being submitted The problem was identified and corrected as evidenced by the test results on the second, third, and fourth days of testing. PwC listed this as a category 1 deviation where adherence to the process did not occur at least 95% of the time. When considering the first day of testing, BellSouth failed to return 47 of the 124 bulk migration notifications. However, once the server problem was corrected, BellSouth successfully submitted 119 notices on the second day, 108 notices on the third day, and 371 notices on the fourth day of testing. In other words, BellSouth's performance was 99.7% after the issue was resolved from the first day of testing.

After considering the materiality of the deviations noted by PwC in their report, it is clear that BellSouth's first assertion has been validated. PwC ultimately found that this test validated the sufficiency of BellSouth's Bulk Migration Process and the results provide quantifiable proof that BellSouth's process is effective in

allowing CLECs to migrate large numbers of their customers from UNE-P to a variety of UNE-L services.

To further support this finding, BellSouth would note that its hot cut process was also tested by KPMG (now known as BearingPoint) most recently during the Florida Third Party Test KPMG first conducted a detailed review of BellSouth's methods and procedures documents that governed hot cuts Next, like PwC, KPMG then physically observed BellSouth technicians as they performed actual hot cuts. Their finding was the same as PwC's; namely, that BellSouth technicians provisioned the hot cuts in accordance with documented methods and procedures KPMG took their analysis a step further by also assessing BellSouth's performance from a SQM perspective. There were test points or evaluation criteria used to determine how well BellSouth met the SQM objectives for hot cut completions. KPMG gave a satisfactory rating to each of the evaluation criteria, a clear endorsement of BellSouth's documented hot cut process and its ability to successfully follow it. In addition to the findings of PwC and KPMG, both this Commission and the FCC likewise confirmed the effectiveness of BellSouth's hot cut process during BellSouth's Section 271 Application approval process, concluding that this process is nondiscriminatory, timely, accurate, and effective.

BellSouth's Second Assertion

Q. WHY DID BELLSOUTH MAKE THE SECOND ASSERTION?

A. BellSouth made the second assertion to provide proof that the Bulk Migration

Process applies ubiquitously across the BellSouth region.

Q. DOES PwC'S CONFIRMATION OF THE SECOND ASSERTION PROVIDE PROOF THAT THE PROVISIONING PORTION OF BELLSOUTH'S HOT CUT PROCESSES ARE THE SAME REGION-WIDE?

A. Yes. In order to verify the validity of the second assertion, PwC observed live hot cuts across the region served by BellSouth. PwC employed sampling techniques as described beginning in paragraph 34 of Exhibit MM-2 to determine the sample size of observations needed for the BellSouth region. PwC was able to observe sufficient order volume in seven (7) of the states served by BellSouth. They were unable to obtain sufficient volume in Alabama or Kentucky, although that does not alter the fact that the same hot cut process is utilized across all nine (9) states. Beginning in paragraph 39 of Exhibit MM-2, PwC described the processes that they observed. They concluded that these same processes were in use across all the states in the BellSouth region. Based upon these observations, PwC's testing leads to the conclusion that the same UNE-L hot cut process applies in each of BellSouth's states. Thus, Bulk Migration Process and its proven success in enabling a CLEC to migrate customers in a bulk fashion is applicable to all the states within the BellSouth region.

Q DID PwC LIST ANY DEVIATIONS DURING THEIR EVALUATION OF THE REGIONALITY ASSERTION?

A. Yes, similar to the first assertion, PwC did identify and list a few items that it titled

deviations. Again, it is important to look at the total context of their live hot cut testing to put their observations in perspective. PwC observed 96 live hot cut service orders for a total of 179 migrations to test BellSouth's regionality assertion. Out of 179 hot cuts, it is important to note that all 179 hot cuts were successfully completed.

In Attachment C to their Report of Independent Accountants for the second assertion, which is contained in Exhibit MM-1, PwC listed the deviations that they observed. The first six (6) deviations are the same deviations cited for the first assertion. PwC elected to place deviations to the actual hot cut process itself in both reports The deviation explanations will not be repeated. The following paragraphs provide an explanation of the deviations directly associated with the second assertion and its impact to the customer, if any.

Second Assertion, Deviation 7—this deviation resulted from a simple process step omission that ultimately had no direct impact on the success of the hot cut PwC found a total of nine (9) occasions in which BellSouth technicians inadvertently omitted either a CLEC or BellSouth pre-hot cut verification step. It is important to note that the observed process step omissions were not a regionality issue; they were simply issues of BellSouth technicians not completely following the same hot cut process that is used across the BellSouth region In spite of the omitted step, all nine (9) hot cuts resulted in successful conversions PwC listed this as a category 1 deviation where adherence to the process did not occur at least 95% of the time.

Second assertion, Deviation 8—this deviation resulted when there was no BellSouth dial tone on the day of the cut for one (1) of the 179 hot cuts. In this case, instead of attempting to restore dial tone on the BellSouth side of the cut, the technician elected to go ahead with the hot cut. The cut was successfully made, and the CLEC accepted the migration when contacted by the CWINS center. As stated previously, no dial tone conditions infrequently occur, however, when it does, BellSouth has procedures in place to resolve these types of issues and complete a successful migration PwC listed this as a category 1 deviation where adherence to the process did not occur at least 95% of the time

Second Assertion, Deviation 9—this deviation was noted after an attempt to resolve a CLEC issue on one (1) of the 179 hot cuts. When the BellSouth technician began the hot cut process on the due date, there was no CLEC dial tone so the technician correctly put the order in a missed appointment status that returns the responsibility back to the CLEC to resolve the missing dial tone issue. On the next day, there was an additional hot cut being observed by the same PwC tester. While the PwC tester was in the central office, the BellSouth technician checked on the hot cut from the previous day. The CLEC had corrected their dial tone problem, so the technician completed the hot cut The technician should not have made the cut since the service order was still in a missed appointment status, however. Thus, the hot cut process was not correctly followed and this observation was listed as a deviation. To further complicate the story, the CLEC had actually ported the TN on the day prior to the due date of the hot cut. The bottom line is that the customer could make calls, but could not receive any calls for two (2) days, and it would have been longer if

the BellSouth technician had not violated the process and completed the hot cut. PwC listed this as a category 2 deviation where customer service was impacted for over 15 minutes.

At the end of this testing period, 100% of the hot cuts were successfully completed which can be attributed to the numerous checks and balances that BellSouth has intentionally built into the hot cut process. Because of the existence of multiple crosschecks, the omission of one step, as observed by PwC, does not typically derail the actual conversion. Similarly, in these instances, there was no material impact to the CLEC customer. Again, based upon the Bulk Migration Test as well as live hot cut observations, PwC confirmed that BellSouth uses the same hot cut process for individual and bulk hot cuts. They further confirmed that this same process is used ubiquitously across the BellSouth region

BellSouth's Mass Migration Conversion Process

Q. PLEASE DESCRIBE HOW BELLSOUTH'S MASS MIGRATION CONVERSION PROCESS IS RELATED TO THE INDIVIDUAL AND BATCH MIGRATION PROCESSES.

A. As described in the testimony of Ken Ainsworth, BellSouth's Batch Hot Cut Process complies with the requirements of the *Triennial Review Order* and allows for the seamless and efficient migration of UNE-P service to UNE-L service such that CLECs are not impaired without access to unbundled switching.

That being said, BellSouth will adopt a third hot cut process to address alleged CLEC concerns about batch provisioning and non-recurring costs at such time as it receives unbundled switching relief in UNE Zones cut by Component Economic Areas. The third process is known as the Mass Migration Conversion Process.

With the advent of the Mass Migration Conversion Process, BellSouth will offer three migration options to CLECs:

1. Individual Conversions
2. Batch Migration Process as described in the testimony of Mr. Ken Ainsworth
3. Mass Migration Conversions.

Exhibit MM-3, attached hereto, provides process overview and flows for the Mass Migration Conversion Process.

Q. PLEASE GENERALLY DESCRIBE THE MASS MIGRATION CONVERSION PROCESS.

A. While BellSouth disagrees with the CLEC criticism that its Batch Process is not a batch provisioning process, in a further effort to meet CLEC needs, BellSouth has developed the Mass Migration Conversion Process Generally, the Mass Migration Conversion Process allows a CLEC to submit a spreadsheet of telephone numbers and some other minimal information to BellSouth for conversion. Once the CLEC submits the spreadsheet, BellSouth performs all the other tasks associated with the cut including order submission and number

porting. BellSouth gains efficiencies through this process by eliminating the coordination between BellSouth and the CLEC and by batching the provisioning orders and eliminating duplicative dispatches.

The gains in efficiencies result in lower costs to the CLECs. Not only do the CLECs avoid the costs associated with the hot cuts from their side of the network, but they pay a reduced non-recurring charge for the cuts themselves. In addition, BellSouth will charge the CLEC a reduced recurring rate when the conversion process begins with the service order creation, as discussed in greater detail below. The immediate access to the lower rate should make the CLEC indifferent as to when the end-user's loop is actually cut from BellSouth's switch to the CLEC's switch.

Q. CAN YOU PROVIDE MORE SPECIFICITY ABOUT THE PROCESS?

A. Certainly. A Mass Migration request allows a CLEC to submit a spreadsheet for the purpose of migrating large numbers of non-complex UNE-P service to UNE-L with LNP (Local Number Portability) Approximately 70% of the embedded base of UNE-P service within the BellSouth region is residential class of service. The majority of the remaining embedded base of business class of service is non-complex The Mass Migration process has been established for simple large scale residential and small business embedded base mass conversions. The intent is for this process to provide the flexibility by applying the "80% rule" (i.e., the simple UNE-P conversions). In keeping with this principle, the following "simple" UNE-L services will be eligible for Mass Migrations:

- 2 Wire Unbundled Voice Loop – Service Level 1 ("SL1")
- 2 Wire Unbundled Voice Loop – Service Level 2 ("SL2")
- 2 Wire Unbundled Copper Loop – Non-Designed (UCL-ND)

To utilize this process, a planning phase will be conducted with the CLEC prior to the submission of its first mass migration spreadsheet. The purpose of the planning meeting is to ensure that the CLEC switch is operational and ready for the Telephone Numbers ("TNs") to be translated. Additionally, this phase will allow for negotiations of dates based on the volume level of conversions for the mass migration batch conversions and to confirm that the CLEC is aware of the information that is required on the spreadsheet.

Next, the CLEC submits a spreadsheet with pertinent information for the telephone numbers that the CLEC wants to migrate. BellSouth then internally project manages and completes all migration activities for pre-ordering, ordering and provisioning including all Local Number Porting ("LNP") activity. From a CLEC perspective, the Mass Migration Conversion Process will allow for seamless pre-ordering, ordering and provisioning batch migrations. In contrast to the Batch Process, the Mass Migration Conversion Process shifts the "control" of the conversion activities back to BellSouth. This "control" allows for even greater efficiencies that can be passed along to CLECs with even steeper Non-Recurring Charge ("NRC") discounts.

Again, the intent of the Mass Migration Conversion Process is to provide an option for a CLEC to provide minimal information to BellSouth and for BellSouth

to handle all conversion activities. This will allow BellSouth to have more autonomy with the timing of conversions so as to balance its workforce with the workload.

Due to the efficiencies in force and load balancing that BellSouth will gain in the Mass Migration Process, this process will be offered to CLECs at higher level of discount for the NRC. The discount structure can be seen in the following table.

Number of TNs to Migrate	Geographic Area	Targeted Migration Time Period	Pricing Targeted UNE-L NRC Reductions
500 to 2000	UNE Zones cut by Component Economic Areas	Negotiated period based on actual migration volume, but not expected to exceed 60 Days	15%
> 2000	UNE Zones cut by Component Economic Areas	Negotiated period based on actual migration volume, but not expected to exceed 180 Days	25%

To address concerns that CLECs may have with the timing of mass migration conversions, during the mass migration period, BellSouth will offer to bill the CLEC at the UNE-L recurring charge price instead of billing the CLEC for the various components that comprise the UNE-P (i.e., loop, port, usage, etc). Said another way, once a CLEC submits to BellSouth a list of telephone numbers which triggers initiation of service orders, the CLEC will have the opportunity to pay the UNE-L recurring rate rather than the recurring rates for the elements that comprise the UNE-P. BellSouth will also initiate the non-recurring rate for each

TN conversion (minus the discount) on the same date as the UNE-P to UNE-L recurring charge change. Normally, BellSouth's billing systems are constructed to bill on the actual conversion dates when service orders are completed. In the case of the Mass Migration process, however, the pricing changes previously described will be effected through billing adjustments and credits once the individual telephone numbers are migrated to the CLEC's switch and the service orders are completed.

Q. WOULD YOU SUMMARIZE YOUR TESTIMONY?

A. Yes. Through the testing conducted by PwC, BellSouth has demonstrated that its Bulk Migration Process of UNE-P service to UNE-L service is both seamless and effective PwC observed some 724 hot cuts utilizing the Bulk Migration Process and some 179 live hot cuts in several states. The test corroborates the testimony of BellSouth's witness, Mr Ken Ainsworth, that BellSouth provides a proven, seamless, high quality individual hot cut process to handle the UNE-L volumes that would likely result if BellSouth were to obtain full relief from unbundled circuit switching; and that BellSouth provides a batch hot cut process that offers additional ordering and provisioning efficiencies to enhance the same proven, seamless, quality migrations that are currently associated with individual hot cuts. This process will sufficiently support the batch conversion of a CLEC's embedded UNE-P customer base to UNE-L services.

Additionally, BellSouth has developed yet another efficient batch process option to speed the conversion from UNE-P to UNE-L as required by the TRO. The

Mass Migration Conversion Process has been developed with a specific purpose – to convert large numbers of CLEC UNE-P facilities to CLEC switching with minimal CLEC involvement in the individual cutovers To that end, the Mass Migration process is designed for UNE Zones cut by Component Economic Areas where relief from UNE-P is granted

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes

Exhibit No. MM-1

BellSouth Telecommunications, Inc.

Report on the BellSouth Bulk Migration and Regional Tests

December 22, 2003

BellSouth Telecommunications, Inc.
Bulk Migration Process and Regional Tests

Table of Contents

Supplementary Information

PRICEWATERHOUSECOOPERS

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Report of Independent Accountants

To Management of BellSouth Telecommunications, Inc.

We have examined management's assertion, included in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process*, that BellSouth Telecommunication, Inc (BellSouth) utilized the BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process (Bulk Migration Process Document) to complete its test of Bulk Migration service requests for three central offices in Florida The test of the Bulk Migration Process was initiated on October 30, 2003 and completed on December 11, 2003. Management is responsible for the Company's assertion Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting management's assertion and performing such other procedures as we considered necessary in the circumstances We believe that our examination provides a reasonable basis for our opinion

Our examination identified certain instances where BellSouth deviated from the Bulk Migration Process criteria defined in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process* and all are outlined in Attachment A

In our opinion, except for the deviations from the criteria described in Attachment A, BellSouth utilized the Bulk Migration Process, in all material respects, to complete its test of Bulk Migration Service Requests for three central offices in Florida that was initiated on October 30, 2003 and completed on December 11, 2003, based on the criteria defined in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process*

This report is intended solely for the information and use of BellSouth Corporation and BellSouth Telecommunications, Inc and appropriate regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and distribution is not limited.

PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
December 18, 2003

Attachment A

Exceptions to Management Assertions on
BellSouth Telecommunications' Bulk Migration Process

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue

1 While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue The BellSouth dial tone was restored by having the number downloaded to the switch translation tables The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

2 While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test

3 While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed Both orders were scheduled to be cutover on December 11, 2003 However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003

4 While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

5 While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

6 While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover

7 The BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process document states that UNE-L 2 wire unbundled copper loop-non designed and Remote Call Forwarding services can be submitted as Bulk Orders. However, BellSouth's electronic ordering systems will reject UNE-L 2 wire unbundled copper loop-non designed (UCL-ND) and Remote Call Forwarding services that would be included on Bulk Migration orders

8 While observing the process for the completion of bulk migration orders, we noted that EnDI emails were not being received by the CLEC for 49 non-coordinated lines. We noted that 47 of the lines were

cutover on December 2, 2003 and two of the lines were cutover on December 11, 2003. The EnDI emails provide notification to the CLECs that the cutover has been completed

BELLSOUTH

Management Assertions on BellSouth Telecommunications' Bulk Migration Process

Management of BellSouth Telecommunications (BellSouth) asserts that:

BellSouth's Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) Process (Bulk Migration Process) will enable the bulk migration of Competitive Local Exchange Carrier (CLEC) customers. BellSouth's Bulk Migration Process Version 1 is published at http://interconnection.bellsouth.com/ dated March 26, 2003. BellSouth has utilized its Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida from October 30, 2003 through December 11, 2003, with the exception of those items presented in Attachment B During the test, BellSouth submitted test local service requests as a simulated CLEC, and processed the service requests through the provisioning process, however BellSouth did not send NPAC messages. The BellSouth Bulk Migration Test has been defined in Sections V and VI of this report.

The following describes the term "utilized" criteria:

Bulk Process Migration Test

BellSouth Management asserts that Management utilized the Bulk Migration Process during their test of the Bulk Migration service requests. As it relates to this assertion, "utilized" will be assessed according to the following:

- BellSouth processed the service requests as per the Bulk Migration Submission/Flow Process included in the Bulk Migration Process
- BellSouth completed all edit and validation checks on the service requests that are included in the Bulk Migration Process.
- BellSouth was able to convert all test lines by the due dates, up to 125 lines per day per central office, and reestablished dial tone on the CLEC CFA Block.
- BellSouth assigned local service request due dates according to the intervals defined by the Bulk Migration Process.
- BellSouth processed only those services (i e., USOCs) that are included in the Bulk Migration Process.

William N. Stacy

William N. Stacy
Network Vice President
Interconnection Services

Attachment B

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue:

1 While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test

2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.

3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.

4 While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test

6 While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover

7 The BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process document states that UNE-L 2 wire unbundled copper loop-non designed and Remote Call Forwarding services can be submitted as Bulk Orders. However, BellSouth's electronic ordering systems will reject UNE-L 2 wire unbundled copper loop-non designed (UCL-ND) and Remote Call Forwarding services that would be included on Bulk Migration orders.

8 While observing the process for the completion of bulk migration orders, we noted that EnDI emails were not being received by the CLEC for 49 non-coordinated lines We noted that 47 of the lines were cutover on December 2, 2003 and two of the lines were cutover on December 11, 2003. The EnDI emails provide notification to the CLECs that the cutover has been completed.

PRICEWATERHOUSECOOPERS

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Report of Independent Accountants

To Management of BellSouth Telecommunications, Inc.

We have examined management's assertion, included in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process*, that the Hot Cut Process, as it relates to the physical Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003. Management is responsible for the Company's assertion. Our responsibility is to express an opinion based on our examination

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting management's assertion and performing such other procedures as we considered necessary in the circumstances We believe that our examination provides a reasonable basis for our opinion.

We noted that sufficient Hot Cut order volume did not exist within Alabama and Kentucky; accordingly, we could not perform any testing over the Hot Cut Process in those states

Our examination identified certain instances where BellSouth Field or Central Office Technicians deviated from the Hot Cut Process defined in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process* and all are outlined in Attachment C.

In our opinion, except for the deviations from the criteria described in Attachment C, the Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process, in all material respects, as the process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003, based on the criteria set forth in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process*

This report is intended solely for the information and use of BellSouth Corporation and BellSouth Telecommunications, Inc and appropriate regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties However, this report is a matter of public record and distribution is not limited.

PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
December 18, 2003

Attachment C

Exceptions to Management Assertions on
BellSouth Telecommunications' Hot Cut Process

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test

3 While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed Both orders were scheduled to be cutover on December 11, 2003 However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003

4 While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test

6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover

7 While observing Hot Cuts across BellSouth's region, we noted that the central office technician did not perform a pre-cut dial tone and ANAC test for the BellSouth and CLEC lines prior to performing the hot cut for seven telephone numbers We noted that the central office technician did not perform a pre-cut dial tone and ANAC test on the CLEC line prior to performing the hot cut for two additional telephone numbers. We also noted that the BellSouth Technician completed each cutover and successfully verified CLEC dial tone and completed an ANAC test.

8 While observing Hot Cuts across BellSouth's region test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone for one line prior to the cutover. The Central Office

Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

9. While observing Hot Cuts across BellSouth's region, we noted that a cutover was completed despite a service order in a Missed Appointment status Due to the service order being in a Missed Appointment status, an EnDI fax was not sent to the CWINS center

BELLSOUTH

Management Assertions on BellSouth Telecommunications' Hot Cut Process

Management of BellSouth Telecommunications (BellSouth) asserts that·

The Bulk Migration Process requires central office and field technicians to physically perform the Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration (the Hot Cut Process). The Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same Process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003, with the exception of those items noted in Attachment D, based on the criteria below. A description of BellSouth's test of its Bulk Migration Process has been included in Sections V and VI of this report

The following describes the terms "same" and "Hot Cut Process" criteria:

Hot Cut Process

As it relates to this assertion, "same" is defined as.

The Hot Cut Process for non-bulk hot cuts will be considered the same as the Hot Cut Process used during the Bulk Migration Process Test if each of the steps defined as the "Hot Cut Process" below for Central and Field Office Hot Cuts are completed for each process As it relates to this assertion, the "Hot Cut Process" will be defined as the following processes:

Central Office Hot Cuts

1 **Order Receipt** – Central Office (CO) Technicians receive hot cut information associated with service orders via Work Force Administrator-Dispatch In (WFADI) and Switch/FOMS.
2. **Install Jumpers** – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. **Pre-cut Dial Tone and ANAC Testing** – CO technician will test for dial tone and ANAC on the existing BellSouth pair and on the CFA block.
4. **Cutover** – The CO technician performs the cutover according to the Switch/FOMS assignment instructions on the Due Date. Coordinated conversions, as ordered by CLECs, will be performed when advised by the CWINS. Non-coordinated conversions, as ordered by CLECs, will be performed anytime on the Due Date.
5. **Post-Cut Dial Tone Test** – For coordinated cuts, the CO Technician tests the cutover on the BellSouth Cable Pair to ensure that dial tone has been restored and the proper phone number is received.
6. **CLEC Notification**
   a. For Non-Coordinated Hot Cuts, the CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS. Also, the Enhanced Delivery Initiative system (EnDI) system sends a fax or email to the CLEC and a fax to the CWINS center as notification that the Hot Cut is complete.
   b. For Coordinated Hot Cuts, the CO technician advises the CWINS that the cut is complete.

Field Office Hot Cuts

1. **Order Receipt** – Field Office (FO) receives hot cut orders via LMOS/IDS (non-design) or WFA-DO/IDS (dispatch out, design), and CO Technicians receive hot cut order information via WFA-DI and Switch/FOMS.
2. **CO Install Jumper** – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. **CO Continuity Test** – The CO technician performs a continuity test to ensure that the jumper from the F1 Block to the CLEC CFA Block has continuity.
4. **CO Completion** – The CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS.
5. **Field Wiring** – The CO technician will install jumpers according to the LMOS or WFA-DO instructions
6. **Pre Conversion/Migration Dial Tone & ANAC Test**
   a. **BellSouth Dial Tone - Non-Coordinated & Coordinated** - Field Technician will verify dial tone and ANAC to verify results match disconnect order.
   b **CLEC Dial Tone**
      1. **Non-Coordinated** - On Due Date, Field Technician checks for CLEC dial tone on universal and copper lines.
      2. **Coordinated SL1 or SL2** - On Due Date, for universal and copper lines the Field Technician checks for CLEC dial tone, ANACs, and provide Telephone Number to CWINS to verify accuracy.
7. **Field Cutover** – The FO technician performs the cutover of the customer line.
8. **Post-Cut Dial Tone Test** – For coordinated cuts, the FO Technician will test the cutover to ensure that dial tone has been restored and the proper phone number is received
9. **CLEC Notification**
   a. For Non-Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO/IDS or LMOS/IDS system. Also, EnDI sends a fax or email to the CLEC and a fax to the CWINS center as notification as the Hot Cut is complete.
   b. For Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO or LMOS systems and advises the CWINS that the cut is complete.

William N. Stacy

William N. Stacy
Network Vice President
Interconnection Services

Attachment D

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue

1 While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test

2 While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.

3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed Both orders were scheduled to be cutover on December 11, 2003 However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003

4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

6 While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover

7. While observing Hot Cuts across BellSouth's region, we noted that the central office technician did not perform a pre-cut dial tone and ANAC test for the BellSouth and CLEC lines prior to performing the hot cut for seven telephone numbers. We noted that the central office technician did not perform a pre-cut dial tone and ANAC test on the CLEC line prior to performing the hot cut for two additional telephone numbers. We also noted that the BellSouth Technician completed each cutover and successfully verified CLEC dial tone and completed an ANAC test.

8. While observing Hot Cuts across BellSouth's region test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone for one line prior to the cutover. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

9. While observing Hot Cuts across BellSouth's region, we noted that a cutover was completed despite a service order in a Missed Appointment status Due to the service order being in a Missed Appointment status, an EnDI fax was not sent to the CWINS center

Supplementary Information

SECTION V – EXECUTIVE OVERVIEW

A. Overview of Reports

In recognition that the Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration Process (Bulk Migration Process Document) may be used by a CLEC to migrate existing multiple non-complex UNE-P services to a UNE-L offering, BellSouth has completed a test of Bulk Migration service requests for three central offices in Florida. The management of BellSouth requested that PricewaterhouseCoopers LLP (PricewaterhouseCoopers) perform an independent examination surrounding BellSouth's assertion that·

- BellSouth has utilized the Bulk Migration Process during their test of the Bulk Migration service requests for three central offices in Florida, and that,
- The Hot Cut Process, as it relates to the physical Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region

The management of BellSouth has provided herein a description of the Bulk Migration Test completed in Florida and the Regional Test, as well as the criteria for the assertions noted above. BellSouth Management is responsible for identification of the criteria underlying its assertion of utilizing the Bulk Migration Process Document and the sameness of the Hot Cut Process across its region.

B. Objective of Supplementary Test Information

The objective of this information is to provide a description of the Bulk Migration and Regional Tests that were completed in Florida from October 30, 2003 through December 11, 2003.

SECTION VI – BULK MIGRATION AND REGIONAL TESTS

To demonstrate the effectiveness of the Bulk Migration Process, BellSouth conducted a test for three central offices in Florida. For the BellSouth Bulk Migration Florida Test, (the Test), BellSouth simulated an operational CLEC, (Pseudo CLEC) which submitted multiple Bulk Migration Orders. The Test was completed following the guidelines outlined by the Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration Process (Bulk Migration Process Document) BellSouth completed the following during the Test.

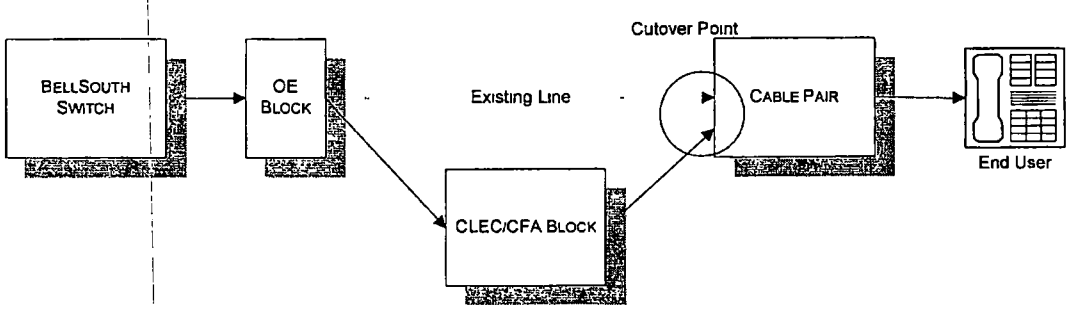
- BellSouth established a UNE-P Test Bed in three Central Offices in Florida Florida is expected to be the first state to have a CLEC exercise the Bulk Migration Process. UNE-P telephone numbers (TNs) were established based on the make-up of outside plant facilities within the state, with approximately 50% on copper, 14% on Universal Digital Loop Carrier (UDLC), and 36% on Integrated Digital Loop Carrier (IDLC). Additionally, approximately 85% of the TNs were established as residential class of service, while 10% were business and 3% were coin The remaining 2% were spread between business and residence classes of service for remote call forwarding solutions.

- The Pseudo CLEC created and submitted 724 Bulk Migration service orders. The submission process included interaction with a BellSouth Project Manager to assign due dates, submission of LSRs through BellSouth's electronic ordering gateways, (i e., TAG, LENS and EDI), and interaction with the BellSouth CWINS during the provisioning of the service orders.

- Service requests submitted by the Pseudo CLEC were processed through BellSouth's systems and service centers as normal transactions

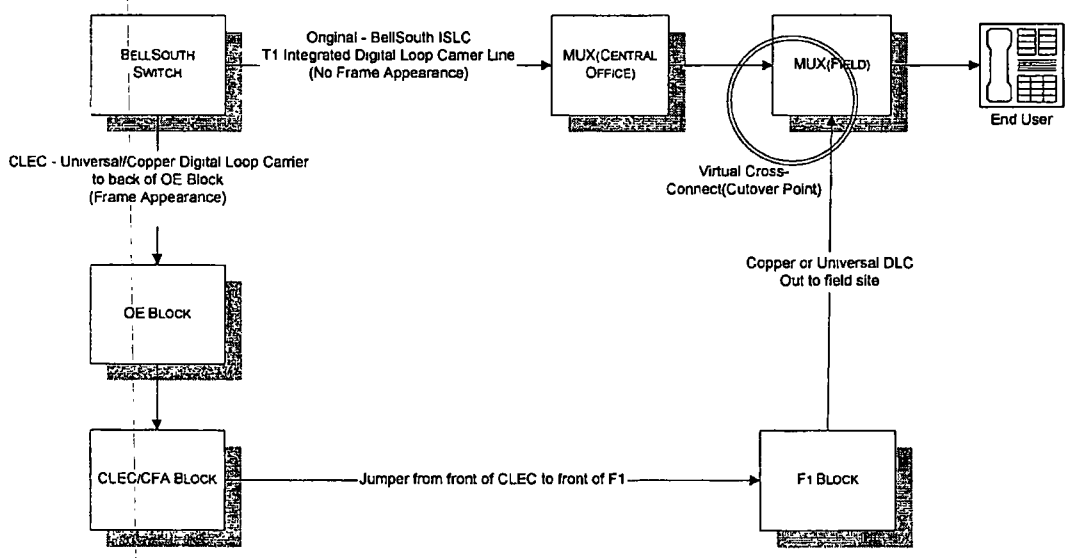
- During a typical copper or universal CLEC Hot Cut, the CLEC will deliver dial tone from its own switch to a collocation point in a BellSouth Central Office. The CLEC collocation points are hard wired to a CLEC Block on the BellSouth Distributing Frame in the central office. Due to BellSouth operating as a Pseudo CLEC, BellSouth had to deliver dial tone from its own switch to its Pseudo CLEC Block on the Distributing Frame This was accomplished by wiring the BellSouth OE Block to the Pseudo CLEC Block on the Distributing Frame for universal and copper services. Refer to Figure 1.0 for a diagram for the generation of Pseudo CLEC dial tone.

Figure 1 0



- During a typical Integrated CLEC Hot Cut, the CLEC will deliver dial tone from its own switch to a collocation point in a BellSouth Central Office. The CLEC collocation points are hard wired to a CLEC Block on the BellSouth Distributing Frame in the central office. Due to BellSouth operating as a Pseudo CLEC, BellSouth had to deliver dial tone from its own switch to its Pseudo CLEC Block on the Distributing Frame Refer to Figure 1 1 for a diagram for the generation of Pseudo CLEC dial tone IDLC facilities have no physical appearance on the BellSouth frame BellSouth established a second set of TNs that were wired to an OE block on the BellSouth frame then to the CLEC CFA block to simulate dial tone for the CLEC switch.

Figure 1 1



- The Test was completed for a total of 758 lines, which include 724 lines processed in accordance to the Bulk Migration Process and 34 lines processed as single orders for Remote Call Forwarding (RCF) and 2 Wire Unbundled Copper Loop-Non Design (UCL-ND). RCF and UCL-ND migrations were initially submitted as Bulk Migration orders, however they were rejected by the electronic ordering systems.

- The central offices included in the Test were West Hollywood, Arch Creek and Perrine.

- The Test did not include the sending of NPAC messages, since the lines in the test were to remain with BellSouth. The Test also did not include a billing verification for those charges that were incurred by the Pseudo CLEC.

To demonstrate that the Hot Cut Process as it relates to the physical Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region, BellSouth completed the following.

- BellSouth has instituted the same work instructions for central office and field technicians for Hot Cuts throughout its region.
- The Hot Cut process utilized by the Bulk Migration Process is the same process utilized by BellSouth for each hot cut provisioned throughout the BellSouth region. Hot Cuts are subject to the same provisioning steps to be completed regardless of their status as a bulk/non-bulk order

SECTION VII - GLOSSARY

AICPA	American Institute of Certified Public Accountants
ANAC	Automatic Number Announcing Circuit
BOPI	Bulk Order Package Identifier
CFA	CLEC Facility Assignment
CLEC	Competitive Local Exchange Carrier
CO	Central Office
CWINS	Customer Wholesale Interconnection Network Services Center
DOE	Direct Order Entry
EATN	Existing Account Telephone Number
EDI	Electronic Data Interchange
EnDI	Enhanced Delivery Initiative
EXACT	Exchange Access Carrier Tracking
FO	Field Office
FOC	Firm Order Confirmation
IDLC	Integrated Digital Loop Carrier
IDS	Integrated Dispatch System
LAUTO	LNP Service Order Generator
LCSC	Local Carrier Service Center
LENS	Local Exchange Navigation System
LMOS	Loop Management Operations System
LNP Gateway	Local Number Portability Gateway
LOTT	Local Order Testing Tube
LSR	Local Service Request
MA	Missed Appointment
NPAC	Number Portability Administration Center
PM	Project Management

PON	Purchase Order Number
SOCS	Service Order Communication System
SUPS	Supplemental
SWITCH/FOMS	Frame Operations Management System
TAG	Telecommunication Access Gateway
TN	Telephone Number
UDLC	Universal Digital Loop Carrier
UNE	Unbundled Network Element
UNE-L	Unbundled Network Element-Loop
UNE-P	Unbundled Network Element-Port
USOC	Universal Service Order Code
WFA	Work Force Administrator
WFA-C	Work Force Administrator – Corporate
WFA-DI	Work Force Administrator – Dispatch In
WFA-DO	Work Force Administrator – Dispatch Out

Exhibit No. MM-2

AFFIDAVIT OF PAUL M. GAYNOR

State of Georgia)
)
County of Fulton)

Paul Gaynor, having first been duly sworn, hereby states as follows:

1. I am a Principal in PricewaterhouseCoopers LLP's (PwC's) Telecommunications Industry Practice. In this capacity, I am responsible for providing information technology assurance services to PwC's telecommunications clients. I have over 16 years of relevant experience including performing audits of financial statements and attestations in a variety of industries. In addition, I have spent 3 years as an internal auditor in the financial services and manufacturing industries I have 2 years experience working the telecommunications industry for a Competitive Local Exchange Carrier (CLEC), where I was responsible for all systems and operations

2 I directed and coordinated PwC's performance of an attestation examination of the BellSouth Telecommunications, Inc. management assertions that: (1) BellSouth has utilized its Unbundled Network Element-Port Loop Combination (UNE-P) to Unbundled Network Element-Loop (UNE-L) Process (Bulk Migration Process) as it completed a test of Bulk Migration service requests for three central offices in Florida; and (2) Whether the Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same Process used for non-bulk hot cuts in BellSouth's region.

3. This affidavit was prepared to provide additional detail of the types of procedures PwC utilized in our attest examination on BellSouth's management assertions as of December 18, 2003 described within our report dated December 18, 2003, included as Attachment A.

4. A total of 17 PwC professionals spent over 2,500 hours performing the work described in this affidavit. The PwC professionals included 4 partners, a director, and 2 senior managers Our partners, director and senior managers led all aspects of the fieldwork. All of the PwC partners, director and senior managers, and many of the staff, who worked on this engagement, have extensive telecommunications industry and telecommunications business process and/or systems experience

5. The attestation examination discussed herein was conducted in accordance with the attestation standards of the American Institute of Certified Public Accountants (AICPA). An attestation examination is one in which a practitioner is engaged to issue a written communication that expresses a conclusion about the reliability of a written assertion that is the responsibility of another party. An attestation examination is the highest level of assurance that can be provided on a written assertion under these standards. PwC's conclusions regarding its attestation examination of BellSouth's management assertions are set forth in the "Independent Accountant's Report" which is appended hereto as Attachment A. Also, a copy of the BellSouth management assertion is appended hereto as Attachment A.

6 BellSouth Management asserted the following· (First Assertion)

BellSouth has an Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) Process (Bulk Migration Process) that will enable the bulk migration of Competitive Local Exchange Carrier (CLEC) customers. BellSouth's Bulk Migration Process Version 1 is published at http://interconnection.bellsouth.com/ dated March 26, 2003. BellSouth completed a test of Bulk Migration service requests for three central offices in Florida. During the test,

BellSouth submitted local service requests as a Pseudo CLEC, and processed the service requests through the provisioning process; however, BellSouth did not send NPAC messages. The BellSouth Bulk Migration Test has been defined in paragraph 11.

7 BellSouth Management asserts that Management utilized the Bulk Migration Process during their test of the Bulk Migration service requests. As it relates to this assertion, "utilized" will be assessed according to the following:

- BellSouth processed the service requests as per the Bulk Migration Submission/Flow Process included in the Bulk Migration Process.
- BellSouth completed all edits and validation checks on the service requests that are included in the Bulk Migration Process.
- BellSouth was able to convert all test lines by the due dates, up to 125 lines per day per central office, and reestablished dial tone on the CLEC CFA Block.
- BellSouth assigned local service requests due dates according to the intervals defined by the Bulk Migration Process
- BellSouth processed only those services (i.e., USOCs) that are included in the Bulk Migration Process.

8. BellSouth Management also asserted the following. (Second Assertion)

The Bulk Migration Process required central office and field technicians to physically perform the Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration (the Hot Cut Process). The Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same Process used for non-bulk hot cuts in BellSouth's region based on the criteria below.

9. The following described the terms "same" and "Hot Cut Process" criteria:

   As it relates to this assertion, "same" was defined as:

   - The Hot Cut Process for non-bulk hot cuts will be considered the same as the Hot Cut Process used during the Bulk Migration Process Test if each of the steps defined as the "Hot Cut Process" below for Central and Field Office Hot Cuts are completed for each process. As it relates to this assertion, the "Hot Cut Process" will be defined as the following processes.

     Central Office Hot Cuts

     1. Order Receipt – Central Office (CO) Technicians receive hot cut information associated with service orders via Work Force Administrator-Dispatch In (WFA-DI) and Switch/FOMS.
     2. Install Jumpers – The CO technician will install jumpers according to the Switch/FOMS instructions.
     3. Pre-cut Dial Tone and ANAC Testing – CO technician will test for dial tone and ANAC on the existing BellSouth pair and on the CLEC CFA block.
     4 Cutover – The CO technician performs the cutover according to the Switch/FOMS assignment instructions on the Due Date Coordinated conversions, as ordered by CLECs, will be performed when advised by the CWINS Non-coordinated conversions, as ordered by CLECs, will be performed anytime on the Due Date.
     5. Post-Cut Dial Tone Test – For coordinated cuts, the CO Technician tests the cutover on the BellSouth Cable Pair to ensure that dial tone has been restored and the proper phone number is received.
     6. CLEC Notification

A. For Non-Coordinated Hot Cuts, the CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS. Also, the Enhanced Delivery Initiative (EnDI) system sends a fax or email to the CLEC and a fax to the CWINS center as notification that the Hot Cut is complete.

B. For Coordinated Hot Cuts, the CO technician advises the CWINS that the cut is complete.

Field Office Hot Cuts

1. Order Receipt – Field Office (FO) receives hot cut orders via LMOS/IDS (non-design) or WFA-DO/IDS (dispatch out, design), and CO Technicians receive hot cut order information via WFA-DI and Switch/FOMS.
2 CO Install Jumper – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. CO Continuity Test – The CO technician performs a continuity test to ensure that the jumper from the F1 Block to the CLEC CFA Block has continuity.
4. CO Completion – The CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS.
5. Field Wiring – The CO technician will install jumpers according to the LMOS or WFA-DO instructions.
6. Pre Conversion/Migration Dial Tone & ANAC Test
   a. BellSouth Dial Tone - Non-Coordinated & Coordinated - Field Technician will verify dial tone and ANAC to verify results match disconnect order.
   b. CLEC Dial Tone

1. Non-Coordinated - On Due Date, Field Technician checks for CLEC dial tone on universal and copper lines.
2. Coordinated SL1 or SL2 - On Due Date, for universal and copper lines the Field Technician checks for CLEC dial tone, ANACs, and provide Telephone Number to CWINS to verify accuracy.

7. Field Cutover – The FO technician performs the cutover of the customer line
8. Post-Cut Dial Tone Test – For coordinated cuts, the FO Technician will test the cutover to ensure that dial tone has been restored and the proper phone number is received.
9. CLEC Notification
   a. For Non-Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO/IDS or LMOS/IDS system Also, EnDI sends a fax or email to the CLEC and a fax to the CWINS center as notification as the Hot Cut is complete.
   b. For Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO or LMOS systems and advises the CWINS that the cut is complete

Engagement Planning

10. PwC completed a walkthrough of Hot Cut transactions to gain an understanding of the key project notification, ordering and provisioning activities, this included observing live Hot Cuts prior to testing to further our understanding of the provisioning process. Next, PwC developed a detailed test plan that included testing of the Bulk Migration Process key actions. For example, the receipt of a firm order confirmation and reestablishment of

customer service within 15 minutes were considered two of the key actions in the ordering and provisioning of Bulk Migrations Refer to the *PwC Testing* section of this affidavit for a complete description of the key actions tested by PwC.

11 PwC assessed the threshold for exception reporting based on our understanding of the Bulk Migration and Hot Cut Processes. Refer to our report dated December 18, 2003, which has been included as Attachment A, for a description of all issues that exceeded the exception reporting threshold. The exception reporting threshold had been established according to the following:

- PwC identified key action points within the Bulk Migration Process. PwC identified an exception if during the BellSouth Bulk Migration Process, local service request transactions did not successfully pass each key action point at least 95% of the time. The basis for selecting 95% was historic acceptance by external parties that hold organizations to a high standard, but not an unachievable standard.
- PwC also identified an exception where customer service would have been impacted for greater than 15 minutes, regardless of the percentage of transactions affected (i.e., not subject to the 95% threshold). The Hot Cut process inherently affects customer service. However, PwC determined that any customer service that is affected for greater than 15 minutes would be deemed an exception.
- PwC applied professional judgment to determine exceptions that do not meet the criteria above, however may be required to be reported. For example, if the Bulk Migration Process of local service request transactions successfully passed a key action point 95% of the time and customer service is not impacted, it would not be deemed an exception based on the criteria above However, due to the criticality of select action

points within the Bulk Migration Process (i.e , completing dial tone checks prior to cutover of a line), PwC has held these transactions to a "Higher Standard" Refer to the *Exceptions* section of this affidavit for a description of all exceptions identified

Florida Bulk Migration Process Test

12 Our examination covered the submission of the project notification by the Pseudo CLEC, the review of the project manager activities as stated in the Bulk Migration Process document, the activities of the Local Carrier Service Center (LCSC), the submission of the orders into the Service Order Communications System (SOCS), the activities of the Customer Wholesale Interconnection Network Services Center (CWINS), the provisioning process including the actual hot cut, as well as the close out of the order in Work Force Administration (WFA) and Switch/FOMS. PwC reviewed the following documentation to gain an understanding of the BellSouth Bulk Migration process:

- The Bulk Migration Process Document
- Bulk Ordered UNE-P Port Out with Loop Process Flow (BellSouth)
- BellSouth procedures for Central Office Operations for UNBUNDLED Local Loop Service
- UNE-P to UNE-L Bulk Migration Overview
- Bulk Migration Process for Non-Coordinated SL1 Orders
- Screening Work Process for Designed and Non Designed Provisioning
- Network SSI&M / I&M Methods and Procedures For Provisioning Unbundled Network Elements Unbundled Voice Loops
- Enhanced Delivery Initiative Process for SL1 Group

- LNP-UNE to UNE Bulk Migration (UNE-P to UNE L) [Mechanized Procedures]
- Network SSI&M / I&M Methods and Procedures For Provisioning Unbundled Network Elements Unbundled Copper Loop-Non-Designed (UCL-ND)
- Unbundled Non-Designed (SL1) and (SL2) Voice Grade Loops-SL1 Wiring and Testing Work Steps
- Customer Care Project Management-UNE-P to UNE-L Bulk Migration Process

13 To demonstrate the effectiveness of the Bulk Migration Process, BellSouth developed a listing of local service requests (LSRs) for submission through the processes defined in the Bulk Migration Process document. In developing the list of LSRs, BellSouth sampled one year's data of single migration requests to determine the breakdown of Unbundled Network Element-Port Loop Combination (UNE-P) Universal Service Order Codes (USOCs) that could be requested for transfer to Unbundled Network Element Loop (UNE-L) USOCs, according to the Bulk Migration Process. Based on this sample, BellSouth designed the UNE-P embedded base to meet the following statistical breakdown of eligible USOCs: Business (UEPBX)-10%, Residential (UEPRX)-85%, Coin (UEPCO)-3%, Business Remote Call Forwarding-1%, and Residential Remote Call Forwarding-1%. Next, BellSouth determined the statistical representation of UNE-L USOC migrations: UEAL2 – 94%, while UEAR2, UCLPW, UCL2W, UCL4W, UCL4O, UEQ2X, UAL2W, UHL2W, and UHL4W combined comprised 6%. UNE-P telephone numbers (TNs) were established based on the make-up of outside plant facilities within the state with approximately 50% on copper, 14% on Universal Digital Loop Carrier (UDLC), and 36% on Integrated Digital Loop Carrier (IDLC).

14. Numerous BellSouth employees were engaged to emulate the role of the Pseudo CLEC. Among the roles performed by the Pseudo CLEC were the administrative and operational roles associated with an actual CLEC.

Administrative Roles

15 The Pseudo CLEC created and submitted 724 Bulk Migrations. The submission process included interaction with a BellSouth Project Manager to assign due dates, submission of bulk LSRs through BellSouth electronic ordering gateways (i.e. TAG, LENS, and EDI), and the interaction with the BellSouth Local Carrier Service Center (LCSC), for processing of the orders and the interaction with the BellSouth Customer Wholesale Interconnection Network Services Center (CWINS) during the provisioning of the service orders. Service requests submitted by the Pseudo CLEC were processed through BellSouth's systems and service centers as normal transactions

Operational Roles

16. The Pseudo CLEC completed a test that included 724 bulk migration lines processed in accordance with the Bulk Migration Process. The Pseudo CLEC also submitted 34 lines that were processed as single orders for Remote Call Forwarding (RCF) and 2 Wire Unbundled Copper Loop – Non Designed (UCL-ND) However, PwC's assessment included transactions submitted as Bulk Migrations and did not include the 34 RCF and UCL-ND lines. The Florida central offices included in the test were West Hollywood, Arch Creek, and Perrine.

17. The provisioning of the 724 lines included the central office and field technicians receiving the orders, installing the jumpers, performing a pre-cut dial tone and ANAC test,

performing the cutover, performing a post cut dial tone test, and informing the Pseudo CLEC or CWINS that the cut was completed.

18. Due to BellSouth acting as a Pseudo CLEC, without a CLEC switch, BellSouth did not send NPAC messages to officially port phone numbers and they did not include a billing verification for those charges that were incurred by the Pseudo CLEC.

19. The Pseudo CLEC was able to simulate the dial tone of a CLEC, for a Copper or UDLC Hot Cuts by wiring the BellSouth Originating Equipment (OE) block to the Pseudo CLEC block on the Distributing Frame. For copper and universal lines, the Pseudo CLEC half-tapped the jumper at the OE Block for each telephone number (TN) and connected a terminal pair on the Pseudo CLEC "CFA" block.

20 Due to BellSouth acting as the Pseudo CLEC, BellSouth had to deliver a dial tone from its own switch to its Pseudo CLEC CFA block IDLC facilities have no physical appearance on the BellSouth frame. BellSouth established a second set of TNs that were wired to an OE block on the BellSouth frame then to the CLEC CFA block to simulate dial tone for the CLEC switch

PwC Testing

21. PwC conducted testing for all 724 Bulk Migration service requests and did not select a sample.

22. In examining management's assertion that it has utilized its Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida, PwC conducted numerous observations, validations, and re-performances pertaining to the responsibilities of the Pseudo CLEC and the responsibilities of the BellSouth Project

Manager (PM). PwC conducted the following examination steps relating to the PM and Pseudo CLEC·

- PwC observed the Pseudo CLEC's creation of project notifications.
- PwC obtained and examined emails used by the Pseudo CLEC for the project notification submission process.
- PwC observed the PM's process of validating project notifications and assigning them Bulk Order Package Identifiers (BOPI)s.
- PwC re-performed project manager validations on all project notifications
- PwC observed and obtained communications pertaining to the rejection and resubmission process for project notifications.
- PwC obtained and examined email communication between the PM and the Workforce Management Center (WMC) for negotiation of due dates.
- PwC obtained and examined emails used by the PM to authorize the submission of BOPIs into the LNP Gateway by the Pseudo CLEC via TAG, EDI, or LENS.
- PwC observed and verified the submission of BOPIs into the LNP Gateway via TAG, EDI, or LENS by the Pseudo CLEC.
- PwC ensured that all orders requested were completed and communicated back to the Pseudo CLEC.
- PwC traced email communication and submission dates in order to test and verify that BellSouth operated under the timing restrictions specified in the Bulk Migration Process Document.
- PwC requested that the Pseudo CLEC submit Local Service Requests with inaccurate or incomplete data to validate BellSouth's edit/validation processes. PwC traced these

Local Service Requests and verified that the BellSouth Project Manager or electronic order systems identified the invalid transactions and rejected them.

23. In examining BellSouth management's assertion that it utilized its Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida, PwC made numerous observations and completed testing pertaining to the responsibilities of the Local Carrier Service Center (LCSC). The LCSC is BellSouth's business office for all CLEC's The LCSC receives and processes orders for LSRs. Among the observations PwC made:

- PwC obtained documentation showing that the Bulk Order Packages were processed for first and second level validations and that any rejects were clarified to the Pseudo CLEC.
- PwC obtained and reviewed Open Work Reports for the LCSC service representatives, and observed the representatives handle manual fallout of orders in LNP Gateway.
- PwC observed the representatives enter orders into DOE, EXACT or SOCS.
- PwC observed the representatives enter orders into the Local Order Numbering (LON) system. PwC obtained and reviewed printouts from LON which demonstrated that the representative performed the necessary work for orders requiring manual processing.
- PwC observed and obtained documentation for orders that were issued as supplemental.
- PwC observed LNP Gateway/LAUTO send a Firm Order Commitment (FOC) for each individual Purchase Order Number (PON). PwC obtained LNP Gateway printouts which demonstrated that the order had been FOC submitted and successfully sent to SOCS.

24 PwC observed BellSouth Central Office and Field Technicians and CWINS Service Representatives as they completed the bulk migration provisioning of 724 telephone numbers in 3 locations in Florida. Refer to Attachment B for a breakdown of the various services included in the Florida Bulk Migration Test Our observations were completed at the following locations:

- West Hollywood Central Office and 5 serving Field Office sites,
- Arch Creek Central Office and 2 serving Field Office sites,
- Perrine Central Office and 4 serving Field Office sites, and
- CWINS Centers in Jacksonville and Atlanta.

25. PwC verified that the central office and field technicians received the service order, installed the jumper, performed the pre cut dial tone and ANAC, performed the cutover, performed a post-cut of the dial tone test, and notified the Pseudo CLEC or CWINS that the cut was completed as applicable.

26. In examining management's assertion that it utilized the Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida, PwC made numerous observations pertaining to the responsibilities of the CWINS. The CWINS serves as the single point of contact for provisioning and maintenance of all unbundled network elements. PwC examined the BellSouth process for the CWINS for both the non-coordinated Hot Cuts and the coordinated Hot Cuts The non-coordinated Hot Cuts are processed at the Atlanta CWINS center while the coordinated Hot Cuts are processed at the Jacksonville CWINS center.

- For coordinated cuts, PwC obtained copies of the confirmation emails that the CWINS screening group received from the BellSouth Project Manager and verified that the

CWINS had received notification for each of the Bulk Order Packages that were submitted by the Pseudo CLEC via one of the electronic gateways (EDI, TAG, or LENS).

- For non-coordinated cuts, PwC obtained copies of the confirmation emails that the CWINS screening group received from the BellSouth Project Manager and verified that the CWINS had received notification for each of the Bulk Order Packages that were submitted by the Pseudo CLEC via one of the electronic ordering gateways (EDI, TAG, or LENS)
- PwC verified that all coordinated orders were properly transferred to the CWINS Provisioning Technician by tracing all orders that were submitted by the Pseudo CLEC via the electronic gateway (TAG, EDI, or LENS) through to the completion of the order.
- PwC observed that the CWINS Provisioning Technician contacted the Central Office Technician and Field Technicians for all coordinated test orders and verified that the technician completed the cutover
- PwC verified through observation that the CWINS Provisioning Technician called the Pseudo CLEC within five minutes of completion for all coordinated cutovers.
- PwC observed the CWINS Provisioning Technician close all coordinated orders in WFA-C and SOCS and verified that the orders were closed through examining the WFA log files for each coordinated order.
- PwC observed the Maintenance Administrator (MA) conduct screening procedures to process non-coordinated orders.

- All bulk orders that are considered non-coordinated, must contain time interval criteria on the order in the WFAC system to be processed. PwC validated that all non-coordinated orders processed at the Atlanta CWINS contained the requisite criteria to be considered as non-coordinated orders. PwC reviewed each service order log to verify that each non-coordinated order contained the correct timing intervals and Field Identifiers (FIDs) to be recognized as a non-coordinated.
- PwC validated that MAs monitored the Atlanta CWINS fax machine to check for incoming "Go-Ahead" notifications from EnDI in order to ensure that the Atlanta CWINS abided by the respective worksteps published in the Bulk Migration Process for Non-Coordinated SL1 Orders.
- PwC validated and monitored that MAs also utilized the Go-Ahead Notification internal website to review orders earmarked for go-ahead notification to ensure that Atlanta CWINS personnel followed the requisite worksteps published in the Bulk Migration Process for Non-Coordinated SL1 Orders PwC obtained hard copies of the EnDI faxes and verified that the Purchase Order Numbers (PON) and telephone numbers (TN) matched what were expected.
- PwC validated that MAs tested the phone lines for each non-coordinated order to verify that the non-coordinated order could be closed. This process is called the "open-in" test. PwC verified that the MAs validated the Frame Attendant's completed work by confirming that the MA retested the phone line to ensure that the cut was successful.
- PwC confirmed that the MAs generated and sent emails to the Pseudo CLEC to notify them of completion of the manual go-ahead. In addition to the EnDI fax, PwC obtained

copies of the manual go-ahead documents distributed from these emails. This documentation informs the Pseudo CLEC that migration completed.

- PwC verified that the Atlanta CWINS management contacted the applicable Workforce Management Center (WMC) contacts for orders that did not receive notification by 3:30 PM. PwC observed CWINS management contact the WMC via phone after 3:30PM to address orders without "go-ahead" notification. PwC observed that the WMC advised that the orders were eligible for "Go-Ahead" and PwC confirmed that the CWINS released the orders in MARCH and completed the orders in the WFA-C and SOCS systems respectively. For final verification and documentation, PwC obtained the EnDI fax and manual go-ahead documentation for these respective orders and verified that each manual go-ahead document corresponded to an EnDI fax.

27. Our examination included tracing 724 transactions through the Bulk Migration Process and noting exceptions with these transactions as they pertained to the Bulk Migration Process document. PwC defined control points throughout the Bulk Migration Process to account for all transactions. Among the control points that PwC established to ensure the integrity of the Bulk Migration Process were:

- PwC obtained copies of all Project Notifications submitted by the Pseudo CLEC to the Project Manager and compared those Project Notifications to all Bulk Order Package Identifiers (BOPIs).
- PwC obtained copies of emails demonstrating correspondence between the Pseudo CLEC and the BellSouth Project Manager for acceptance, rejection, and resubmission of PONS.

- PwC obtained copies of the BOPIs and compared those BOPIs to requests in the LNP Gateway / LAUTO systems. PwC obtained printouts for all the PONS entered into the LNP Gateway / LAUTO system by the Pseudo CLEC through either LENS, TAG, or EDI and verified the status (clarified, facilities check, FOC submitted) of each PON. From the LNP Gateway / LAUTO printouts. PwC verified that the PONS have passed both first and second level validation checks within LNP Gateway / LAUTO.
- PwC obtained copies of the PONS that were in LNP Gateway / LAUTO and traced them into the Service Order Communication System (SOCS). The FOC submitted status in LNP Gateway / LAUTO demonstrated that the Pseudo CLEC had a Firm Order Confirmation. PwC also obtained copies of the Open Work Reports which verified those LSRs which required manual intervention and compared those reports to the LON printouts that PwC obtained from the LCSC representatives. The LON system is used to send non-mechanized FOCs to CLECs.
- PwC obtained copies of the SOCS printouts and compared those printouts to the Switch / FOMS orders. The Switch / FOMS printout contains the engineering information (location of cable pair) that the frame attendant used to perform the hot cuts.
- PwC obtained copies of the EnDI faxes and emails and compared them to the BOPIs to demonstrate that all non-coordinated orders had been cut by BellSouth EnDI faxes are received by the Atlanta CWINS for all non-coordinated cuts and EnDI emails are received by the Pseudo CLEC confirming that the non-coordinated cuts had been performed by BellSouth
- PwC obtained the WFA logs for each service order processed during the Florida Bulk Migration Test. The WFA logs permit the tracking of the order status through the

BellSouth provisioning process. The WFA logs contain an audit trail of the work steps completed by Field Technicians, Central Office Technicians, CWINS Service Representatives and other WFA users.

- To gain an understanding of the security controls surrounding the Workforce Administration system, specifically, the WFA log, PwC inquired of BellSouth employees responsible for the operating system and application security for WFA. PwC obtained security settings for the WFA log and verified that the access rights are in place to prevent unauthorized changes.
- PwC obtained the WFA log for all service orders processed during the Bulk Migration Process test. PwC validated that the due date entries corresponded to expected results and that each service order had been closed within WFA.

Exceptions

28. PwC identified instances where BellSouth either deviated from their Bulk Migration Process or impacted customer service during the Hot Cut Process. PwC measured these instances against the criteria developed during the Engagement Planning process to assess their materiality. PwC identified the following issues as instances where BellSouth did not adhere to the Bulk Migration Process for a specific control point for at least 5% (conversely, adherence to the process was less than 95%) of the Bulk Migration Process local service request transactions:

- The Bulk Migration Process Document states that UCL-ND and RCF services can be submitted as Bulk Orders. However, BellSouth's electronic ordering systems will reject UCL-ND and RCF services if submitted on Bulk Migration orders As such, PwC was not able to trace orders for the corresponding USOCs. Upon inquiry,

BellSouth Management stated that no UCL-ND or RCF Bulk Migration service requests had ever been received.

- While observing the process for the completion of bulk migration orders, PwC noted that EnDI emails were not received by the Pseudo CLEC for 49 non-coordinated lines. EnDI emails provide notification to the CLECs that the cutover has been completed. PwC noted that 47 of the lines where emails were not received were cutover on December 2, 2003. BellSouth indicated that a systems issue existed in sending the EnDI emails and had corrected this issue on December 3, 2003. No missing EnDI emails were reported on the December 4, 2003 and December 5, 2003 test days. PwC noted that two of the lines where emails were not received were cutover on December 11, 2003.

29. PwC identified the following issues as directly impacting customer service for a time period of greater than 15 minutes:

- While observing the BellSouth Bulk Migration Process test, PwC noted that the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

- While observing the BellSouth Bulk Migration Process test, PwC noted that three cutovers were completed and dial tone could not be reestablished with 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.
- While observing the BellSouth Bulk Migration Process test, PwC noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003 However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003

30. Certain instances were noted that did not meet the Bulk Migration Process 5% or customer impacting tolerance guidelines defined by PwC in the Engagement Planning process. However, based on the nature of the Hot Cut Process and the importance to all parties involved, these exceptions warranted reporting to provide greater transparency to all readers. The following issues have been deemed reportable by PwC:
    - While observing the BellSouth Bulk Migration Process test, PwC noted that the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test
    - While observing the BellSouth Bulk Migration Process test, PwC noted that for one order a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

- While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.

31. The following items were identified by PwC as instances where BellSouth deviated from their Bulk Migration Process, however these instances occurred less than 5% of the time and therefore were considered non-reportable:

- The Pseudo CLEC submitted a BOPI that did not meet the time interval requirements per the Bulk Migration Process Document. However, this BOPI was submitted electronically 14 days prior to the due date, which met the minimum time interval required for submission
- PwC noted that they were unable to obtain two emails associated with the correspondence between the Pseudo CLEC and BellSouth The emails were regarding the granting of authorization by the BellSouth Project Manager to the Pseudo CLEC to input two BOPIs into the electronic ordering gateways. Per discussion with the BellSouth Project Manager and Pseudo CLEC, the authorization was given verbally.
- While observing the BellSouth Bulk Migration Process test, PwC noted that one EnDI fax was not received by the Atlanta CWINS The EnDI fax notifies the CWINS that the cutover has been completed.
- PwC noted that the Pseudo CLEC input Bulk Migration service requests prior to receiving the authorization to do so from the BellSouth Project Manager. PwC also noted that the BellSouth Project Manager was aware of the submission.

32. Our conclusion is included within our report dated December 18, 2003, which has been included as Attachment A.

Regional Test

33 In conjunction with Florida Bulk Migration testing, PwC verified whether the Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process was the same process used for non-bulk hot cuts in BellSouth's region according to the criteria defined within Management's assertion. As part of PwC's approach to verifying whether this process was the same, PwC viewed UNE-L non-bulk cuts across the BellSouth region.

Sample Size Determination for Regional Hot Cuts

34. PwC employed the following sampling techniques to determine the number of regional Hot Cuts to be tested across the BellSouth region:

- Total Population: > 300
- Confidence Factor: 95%
- Tolerable Rate. 5%
- Expected Error Rate: 1%

35. PwC loaded this criteria into Audit Command Language (ACL) and used the Sampling Size function to determine what sample size should be employed. Based on these criteria, our test population was identified to be 95 transactions.

36. PwC was unable to determine an exact population of future hot cuts due to the unpredictability of CLEC service orders. For purposes of identifying a sample size, PwC used a population of 1,000. Based on the other sample size criteria (i.e., confidence factor

of 95%, Tolerable Rate of 5% and Expected Error Rate of 1%), all populations that are greater than 300 will return a sample size of 95, therefore it is unnecessary to identify an exact population

PwC Testing

37 From October 1, 2003 to December 18, 2003 PwC observed 96 Hot Cut service orders (which comprised of 179 telephone numbers) throughout BellSouth's region. Each week, BellSouth provided PricewaterhouseCoopers a listing of Coordinated Hot Cuts that were scheduled to be completed the following week. The lead times for Coordinated Hot Cuts are typically greater than Non-Coordinated Hot Cuts, which allowed for earlier notification of upcoming service orders. PwC also inquired of BellSouth when Non-Coordinated Hot Cuts were to be completed throughout the region. However, notice for Non-Coordinated Hot Cuts was given approximately two days in advance Hot Cuts were viewed based upon the volume of CLEC activity in those states Refer to Attachment C for details of the 96 Hot Cuts observed throughout BellSouth's region. PwC noted that sufficient Hot Cut order volume did not exist within Alabama and Kentucky; accordingly, we could not perform testing over the Hot Cut Process in those states.

38. PwC observed the following Hot Cuts as part of BellSouth's Bulk Migration Florida Test:

- December 2, 2003 – 124 Bulk Migration Hot Cuts in West Hollywood
- December 4, 2003 – 119 Bulk Migration Hot Cuts in Arch Creek.
- December 5, 2003 – 108 Bulk Migration Cuts in Perrine.
- December 11, 2003 – 125 Bulk Migration Hot Cuts West Hollywood, 126 Bulk Migration Hot Cuts in Arch Creek, 122 Bulk Migration Hot Cuts in Perrine.

39. PwC observed the provisioning of the 96 Hot Cuts included in the Regional Test and the 724 Hot Cuts included in the Bulk Migration Process Test. The following processes were observed:

- PwC observed the Central Office and Field Technician receive the hot cut information associated with service orders via Work Force Administration – Dispatch (WFA-DI), Switch/FOMS, LMOS or IDS
- PwC observed that the jumpers had been installed in accordance with the system instructions.
- PwC validated that Central Office continuity had been established by verifying the telephone number via an ANAC on the BellSouth jumper.
- PwC observed the Central Office Technician test for dial tone and Automatic Number Announcing Circuit (ANAC) on the CLEC pair and on the existing BellSouth pair. PwC validated that the telephone numbers were ANAC'd for the CLEC and BellSouth lines.
- PwC observed the cutover process performed by the Central Office Technician PwC timed the total duration that the customer was without service. The timing began when the existing BellSouth pair was removed from the frame until the CLEC pair was punched into the frame. For any cutover that exceeded one minute, PwC noted the length of the duration the customer would have been without service.
- PwC observed the Central Office Technician test the cutover on the new CLEC cable pair to ensure dial tone had been restored and that the proper telephone number was received.

- PwC observed the workstep system closeout process performed by the Central Office Technician PwC also obtained and examined the Switch/FOMS orders and the WFA logs and verified that the worksteps had been closed for each cutover.
- PwC obtained and examined the EnDI faxes received at the Atlanta CWINS facility for each to verify that each non-coordinated order was cut.

40. Specifically for Field Office Hot Cuts, PwC performed the following:

- PwC observed the field technician perform the electronic cross connect on the laptop. The electronic cross-connect was performed by entering the cable pair information. 1) the cable pairs migrating from 2) the cable pairs migrating to
- PwC observed the Field Office Technician test for dial tone and ANAC on the CLEC pair and on the existing BellSouth pair at the Remote Terminal. PwC validated that the telephone numbers were ANAC'd for the CLEC and BellSouth lines.
- PwC observed the cutover process performed by the Field Office Technician. PwC timed the total duration the customer was without service. The timing began when the existing BellSouth pair was removed from the field terminal until the CLEC pair was connected into the field terminal. For any cutover that exceeded one minute, PwC noted the length of the duration the customer would have been without service.
- PwC observed the Field Office Technician test the cutover on the new CLEC cable pair to ensure dial tone had been restored and that the proper telephone number was returned via an ANAC test.
- PwC observed the workstep closeout process performed by the Field Office Technician in WFA-DO via Technet. PwC also obtained and examined the Switch/FOMS order and the WFA logs and verified that the worksteps had been closed for each cutover

- PwC obtained and examined the standardized BellSouth Central Office Technician UNE-P to UNE-L SL1 and SL2 work instructions from each state in the BellSouth region PwC also verified that the SL1 and SL2 work instructions in each BellSouth state were consistent.
- PwC obtained the EnDI faxes from the CWINS which notifies them that the CLEC's line was cut for non-coordinated cuts.
- PwC observed the CO and Field Technicians inform the CWINS that the CLEC's line was cut for coordinated cuts.

Exceptions

41. PwC noted that six exceptions identified during the Bulk Migration Process Test, directly related to the physical Hot Cut provisioning process included in the Regional Test, noted below, and have been reported in our exceptions noted during the Bulk Migration Test.
    - While observing the BellSouth Bulk Migration Process test, PwC noted that the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, he began troubleshooting the issue The BellSouth dial tone was restored by having the number downloaded to the switch translation tables The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

- PwC noted that three cutovers were completed and dial tone could not be reestablished with 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.
- While observing the BellSouth Bulk Migration Process test, PwC noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003 However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003
- While observing the BellSouth Bulk Migration Process test, PwC noted that the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
- While observing the BellSouth Bulk Migration Process test, PwC noted that for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
- PwC noted that while observing the cutover process for the 125 hot cuts at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.

42. PwC identified instances where BellSouth either deviated from their Hot Cut Process or impacted customer service during the Hot Cut Process. PwC measured these instances

against the criteria developed during the Engagement Planning process to assess whether they are reportable. PwC identified the following issues as instances where BellSouth did not adhere to the Hot Cut Process for a specific control point for at least 5% (conversely, adherence to the process was less than 95%) of the Hot Cut Process:

- While observing Hot Cuts across BellSouth's region, we noted that the central office technician did not perform a pre-cut dial tone and ANAC test for the BellSouth and CLEC lines prior to performing the hot cut for seven telephone numbers We noted that the central office technician did not perform a pre-cut dial tone and ANAC test on the CLEC line prior to performing the hot cut for two additional telephone numbers. We also noted that the BellSouth Technician completed each cutover and successfully verified CLEC dial tone and completed an ANAC test.
- While observing Hot Cuts across BellSouth's region test, we noted that the Central Office Technician was unable to ANAC the BellSouth dial tone for one line prior to the cutover. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

43 PwC identified the following issues as directly impacting customer service for a time period of greater than 15 minutes·

- While observing Hot Cuts across BellSouth's region, we noted that a cutover was completed despite a service order in a Missed Appointment status. Due to the service order being in a Missed Appointment status, an EnDI fax was not sent to the CWINS center

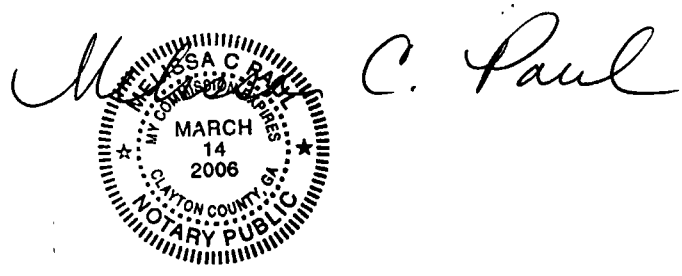
44. Our conclusion is included within our report dated December 18, 2003, which has been included as Attachment A.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 23, 2003

Paul M. Gaynor
Principal, PricewaterhouseCoopers LLP

Subscribed and sworn to before me this 23rd day of December 2003.



Attachment A

(Our reports dated December 18, 2003 with BellSouth Assertions in PDF)

Exhibit No. MM-2

Attachment B

Florida Bulk Migration Cutover Statistics by Quantity and Percentage

Total Orders for the BellSouth Bulk Migration Testing by Field Office & Central Office					
Central Offices in South Florida					
Date / Central Office	**Coordinated**		**Non Coordinated**		**Total Lines**
Quantity	**Central Office**	**Field Office**	**Central Office**	**Field Office**	
12/2/2003					
West Hollywood	17	5	99	3	124
12/4/2003					
Arch Creek	9	12	83	15	119
12/5/2003					
Perrine	0	37	38	33	108
12/11/2003					
West Hollywood	17	4	94	10	125
Arch Creek	4	21	40	61	126
Perrine	9	10	21	82	122
Totals	**56**	**89**	**375**	**204**	**724**

Date / Central Office	**Coordinated**		**Non Coordinated**		**Total Lines**
Percentage	**Central Office**	**Field Office**	**Central Office**	**Field Office**	
12/2/2003					
West Hollywood	2 35%	0 69%	13 67%	0 41%	17 13%
12/4/2003					
Arch Creek	1 24%	1 66%	11 46%	2 07%	16 44%
12/5/2003					
Perrine	0 00%	5 11%	5 25%	4 56%	14 92%
12/11/2003					
West Hollywood	2 35%	0 55%	12 98%	1 38%	17 27%
Arch Creek	0 55%	2 90%	5 52%	8 43%	17 40%
Perrine	1 24%	1 38%	2 90%	11 33%	16 85%
Totals	**7.73%**	**12.29%**	**51.80%**	**28.18%**	**100.00%**

Attachment C

Regional Hot Cut Cutover Statistics

Total Orders for the Regional Hot Cut Testing by State		
State	**Orders Viewed**	**Lines Viewed**
Alabama	1	1
Florida	33	46
Georgia	25	54
Kentucky	0	0
Louisiana	7	17
Mississippi	3	4
North Carolina	17	40
South Carolina	4	6
Tennessee	6	11
Totals	**96**	**179**

	Coordinated	Non Coordinated	Total	Central Office	Field Office	Totals
Orders Viewed	71	25	96	86	10	96
Lines Viewed	154	25	179	151	28	179

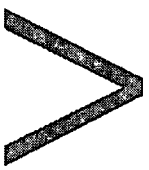
Exhibit MM-3

Mass Migration Conversion Process

>> *Listening > > Answering*

BELLSOUTH®

Exhibit No. MM-3



Content—Mass Migration Conversion Process

- Process Overview
- Process Flow
- Day-by-Day Process Flow
- Glossary

Exhibit No. MM-3

Mass Migration Conversion

Offerings

- Available for non-complex embedded base UNE-P customers migrating to UVL SL1 and SL2 UNE-Loop, and UCL-ND (>80% of embedded base
- Spreadsheet in lieu of individual LSRs or Bulk LSRs
- May include multiple COs
- No volume limitations
- Discount rates
- BLS performs ordering, porting and provisioning activities
- Joint planning phase conducted to negotiate up-front activities and migration period

Advantages

- CLEC to submit large quantities of non-complex UNE-P lines to be migrated via a single request
- The CLEC will not be required to track individual orders or migrations
- CLECs do not have to submit LSRs or coordinate any porting activity
- CLEC experiences seamless pre-ordering, ordering and provisioning batch migrations.
- Reduced cost to CLEC

Mass Migration Conversion

Process Overview

- Mass Migration request are defined by UNE Zones cut by Component Economic Area (CEA)
- BellSouth will implement this Mass Migration Conversion option for CLEC at such time as it receives unbundled switching relief in UNE Zones cut by Component Economic Areas
- Mass Migration is available for migrating existing non-complex residential and business Port/Loop Combination services to Unbundled Loops with LNP
- Eligible UNE-L services.
  - 2 Wire Unbundled Voice Loop – Service Level 1 (SL1)
  - 2 Wire Unbundled Voice Loop – Service Level 2 (SL2)
  - 2 Wire Unbundled Copper Loop – Non-Designed (UCL-ND)
- Minimum of 500 lines per Mass Migration request
- Mass Migrations of 500 – 2000 lines will be completed within a negotiated period based on actual volume, but not expected to exceed to 60 days
- Mass Migrations exceeding 2000 lines will be completed within a negotiated period based on actual volume, but not expected to exceed to 180 days
- BellSouth will internally perform all of the project management, pre-ordering, ordering, provisioning, testing, and porting operations and completion notification necessary to update CLEC records and complete the project in the specified time frame on behalf of the CLEC

Mass Migration Conversion

Process Overview

- A Planning Phase will be conducted with each CLEC prior to the submission of the mass migration spreadsheet. The purpose of the planning meeting is to ensure that the CLEC switch is operational. Additionally, this phase will allow for negotiations of dates based on the volume level of conversions and to confirm spreadsheet requirements
- CLEC would submit spreadsheet including information for TNs to be migrated after a Planning Phase between the CLEC and the BellSouth Project Manager
- Directory listings will remain the same during the migration process
- CLEC EATN's will be considered frozen during the migration period. If an end-user customer changes carriers during the migration period, the CLEC must contact the BellSouth PM to have the TN removed from the mass migration batch conversion project.
- CLECs must establish dial tone for each TN on their switch by the day of spreadsheet submission for mass migrations involving 500 to 2000 TNs, and within a negotiated time period for mass conversions of greater then 2000 TNs.
- Monthly recurring rate will be reduced to the UNE-L rate when conversion service orders are activated
- NRC rate deductions of 15% for 500-2000 conversions and 25% for >2000 conversions will be applied at same time
- 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

Exhibit No. MM-3

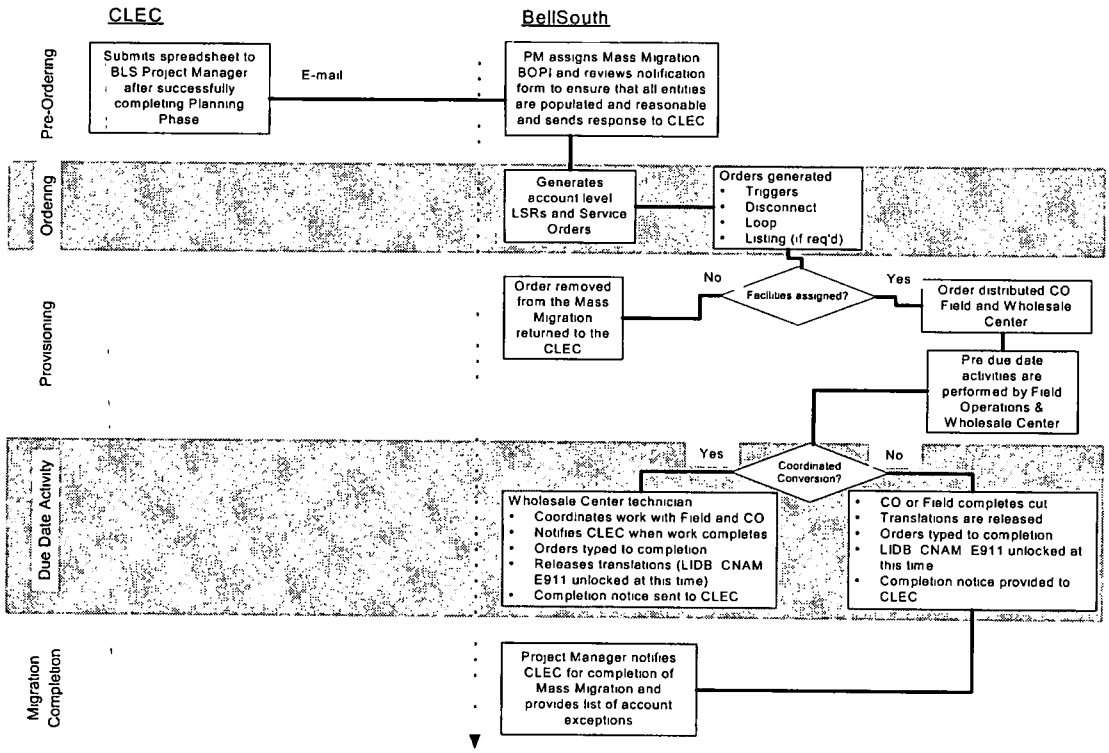
Mass Migration Conversion

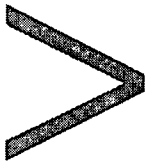
Day-by-Day Process Flow

Pre-Order	•CLEC contacts BellSouth Project Manager to initiate planning phase •CLEC e-mails Mass Migration spreadsheet to BLS Project Manager after completion of planning phase •BLS Project Manager will respond to CLEC spreadsheet within the following time 500 to 2000 TNs—3 business days, >2000 TNs—6 business days
Day 1 to X within the negotiated conversion period	•Orders are issued •Order is assigned and distributed to network organizations •BLS does required NPAC activities •Order is screened •Pre due date activities are performed by Field Operations & Wholesale Center •Conversion is completed and telephone number ported •Orders are completed •Releases translations •LIDB, CNAM, E911 unlocked at this time •Completion notices are sent to CLEC after each individual end-user conversion
Migration completion	Project Manager notifies CLEC for completion of Mass Migration and provides list of account exceptions

Exhibit No. MM-3

Mass Migration Conversion Process Flow





Glossary

Acronyms

BLS	BellSouth Telecommunications
BOPI	Bulk Order Package Identifier
CHC	Coordinated Hot Cut
CEA	Component Economic Area
CLEC	Competitive Local Exchange Carrier
CNAM	Calling Name Delivery
CSOTS	CLEC Service Order Tracking System
CWINS	Customer Wholesale Interconnection Network Services
DD	Due Date
EATN	Existing Account Telephone Number
EnDI	Enhanced Delivery Initiative
LCSC	Local Carrier Service Center
LIDB	Line Information Database

Glossary

Acronyms

LNP	Local Number Portability
LSR	Local Service Request
NPAC	Number Portability Administration Center
PM	Project Manager
PN	Project Notification
PON	Purchase Order Number
SL	Service Level
TN	Telephone Number
UCL-D	Unbundled Cooper Loop – Designed
UCL-ND	Unbundled Cooper Loop – Non-Designed
UNE-P	Unbundled Network Element-Port/Loop Combination
UNE-L	Unbundled Network Element Loop
UVL	Unbundled Voice Loop

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF ALPHONSO J. VARNER

BEFORE THE TENNESSEE REGULATORY AUTHORITY

FILED FEBRUARY 27, 2004

DOCKET NO. 03-00526

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

A. My name is Alphonso J. Varner. I am employed by BellSouth as Assistant Vice President in Interconnection Services. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Florida State University in 1972 with a Bachelor of Engineering Science degree in systems design engineering. I immediately joined Southern Bell in the division of revenues organization with the responsibility for preparation of all Florida investment separations studies for division of revenues and for reviewing interstate settlements.

Subsequently, I accepted an assignment in the rates and tariffs organization with responsibilities for administering selected rates and tariffs including preparation of tariff filings. In January 1994, I was

appointed Senior Director of Pricing for the nine-state region. I was named Senior Director for Regulatory Policy and Planning in August 1994. In April 1997, I was named Senior Director of Regulatory for the nine-state BellSouth region. I accepted my current position in March 2001

Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to:

- Demonstrate to the Tennessee Regulatory Authority ("the Authority") that, based on performance data for the eleven months from December 2002 through October 2003, BellSouth's performance in conducting Hot Cuts, does not pose a barrier to market entry for Competitive Local Exchange Carriers ("CLECs") seeking to serve customer locations with voice-grade loops;
- Propose changes to the existing performance measurements plan to produce even more performance data to increase performance monitoring of the BellSouth's batch hot cut process and the coordinated and non-coordinated hot cuts performed by BellSouth;
- Propose changes to the Self Effectuating Enforcement Mechanism (SEEM) related to hot cuts.

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. My testimony is organized into two sections. Section I contains performance data specifically related to hot cuts, including batch hot cuts,

to demonstrate BellSouth's ability to perform these conversions in an effective and timely manner. In Section II, I will discuss BellSouth's proposed changes and additions to performance measures and SEEM, if it receives unbundled switching relief.

I. BELLSOUTH'S CURRENT HOT CUT PERFORMANCE DATA

Q. WHAT EMPIRICAL EVIDENCE DOES BELLSOUTH PRESENT TO SHOW THAT ITS HOT CUT PERFORMANCE IS NOT AN OPERATIONAL BARRIER TO CLECS ENTERING THE MARKET WITHOUT UNBUNDLED CIRCUIT SWITCHING?

A. My testimony presents performance data generated by measurements approved by the Authority to demonstrate that BellSouth's hot cut process does not present an operational barrier to UNE-Loop (UNE-L) market entry. Data is provided for the period December 2002 through October 2003. Because the Service Quality Measurement ("SQM") plan was revised in July 2003, 7 months of the data are based on the previous SQM A detailed discussion of the Tennessee data, and the performance results, is provided in Exhibit AJV-1.

Q. DO THE CLECS HAVE EMPIRICAL EVIDENCE TO DEMONSTRATE BELLSOUTH'S ABILITY TO PROVIDE UNBUNDLED LOOPS?

A. Yes. The CLECs have access to most of the CLEC aggregate data that I

present here, and can collect data on their own transactions with BellSouth. While I obviously have not seen the CLECs' testimony in this proceeding, other proceedings indicate that the CLECs do not produce data of their own or utilize the CLEC aggregate data produced by BellSouth to comment on BellSouth's performance Instead, they typically rely on unsupported anecdotal evidence or baseless guesses about the future to allege poor performance by BellSouth. If that pattern continues in this proceeding, the Authority should disregard the CLECs' testimony and focus solely on the objective evidence of performance that I present here.

Q WHAT IS THE SOURCE OF THE DATA USED IN YOUR TESTIMONY?

A. The data provided in this filing are produced by the Performance Measurement Analysis Platform (PMAP), which is the same system utilizing the same SQM that produces these data for the Authority, the Authority staff, the Federal Communications Commission ("FCC") and the CLECs each month. The performance results are produced by the same process that yielded the data relied upon by the Authority and the FCC to conclude that BellSouth met its section 271 obligations. PMAP has undergone an extremely thorough third party audit conducted by Bearing Point over multiple years. The metrics audit was concluded in Florida on July 30, 2002 and in Georgia on June 6, 2003 with no significant adverse findings in either state.

Q. WHAT VALUE DOES THE DATA PROVIDED HAVE IN DEMONSTRATING THAT BELLSOUTH'S HOT CUT PROCESS WILL NOT BE AN OPERATIONAL BARRIER FOR CLECS IF SWITCHING IS NO LONGER A UNE?

A. As discussed in the testimony of BellSouth witness Mr. Ken Ainsworth, the hot cut process used by BellSouth in the past will continue to be used in the future. From BellSouth's proven performance track record, the Authority can and should infer that BellSouth's performance will continue at a high level in the future. After all, it has been a year since BellSouth entered the interLATA market in Tennessee, and BellSouth's performance has remained consistently high. Moreover, new measures have been added and existing measures revised to enable the Authority to evaluate even more data on BellSouth's hot cut process.

Q. WHY DID BELLSOUTH INCLUDE ELEVEN MONTHS OF DATA WITH THIS FILING?

A. BellSouth wanted to demonstrate clearly and unequivocally that its performance has met, and will continue to meet, its obligations under the Telecommunications Act of 1996 ("the Act"). The Authority ordered BellSouth to begin providing the same metrics in Tennessee as the Florida Commission ordered beginning with the December 2002 data month. BellSouth has provided the data from that point through October 2003, which is the latest available data at the time of the preparation of this

testimony. In addition, it should be noted that the Florida Commission ordered changes to the SQM, upon which the Tennessee SQM is based, which became effective with July 2003 data. Therefore, the data provided with this filing for July to October 2003 are based on this new SQM filed with the Authority on October 31, 2003 in Docket No 03-00598.

As the Authority will see, BellSouth's performance today relative to hot cuts is substantially the same (and in many cases better) than when the Authority and the FCC approved BellSouth's application to provide interLATA long distance service. Consequently, there is no doubt that BellSouth provides today, as it provided at the time of its 271 application, non-discriminatory, timely and efficient access to UNE loops. To reach a different conclusion today would directly conflict with the Authority's conclusions in endorsing BellSouth's application for interLATA authority in Tennessee.

Q. PLEASE IDENTIFY THE PERFORMANCE MEASUREMENTS THAT BELLSOUTH CURRENTLY REPORTS RELATIVE TO HOT CUT ORDERS.

A BellSouth currently captures its performance results relative to Hot Cuts and Coordinated Customer Conversions (CCC) via four measures listed in the Tennessee SQM:

- P-7 Coordinated Customer Conversion Interval
- P-7A Coordinated Customer Conversions – Hot Cut Timeliness %

within Interval and Average Interval

- P-7B: Coordinated Customer Conversions – Average Recovery Time
- P-7C: Hot Cut Conversions - % Provisioning Troubles Received within 7 days of Completed Service Order

Q. WHAT TYPES OF HOT CUTS ARE INCLUDED IN THE PERFORMANCE DATA?

A. Currently, BellSouth's performance results for measures P-7, P-7A and P-7B only include data for coordinated hot cuts as reflected by the title of the measurements. As originally designed, these Authority approved hot cut measurements only capture coordinated conversions, which account for the vast majority of conversions requested by CLECs. Further, the data necessary to calculate these measures are only available on coordinated hot cuts. The P-7C measurement should include coordinated and non-coordinated hot cuts; however, only data for coordinated hot cuts was being included. The measure was scheduled to be corrected to include non-coordinated cuts beginning with January 2004 data, as reflected in the Preliminary January 2004 Notification Report first filed on November 3, 2003. Analysis included in that preliminary report indicated that correcting this error will have a 0.005% positive impact on results (based on May 2003 data).

Q. YOU INDICATED THAT COORDINATED CONVERSIONS ACCOUNT FOR THE VAST MAJORITY OF CONVERSIONS THAT CLECS REQUEST. PLEASE ILLUSTRATE THE COMPARATIVE VOLUMES OF COORDINATED VERSUS NON-COORDINATED CONVERSIONS.

A. Over the 11-month period from December 2002 to October 2003, the average volume for non-coordinated hot cuts was less than 2% of the total volume for all conversions. In contrast, coordinated hot cuts represented more than 98% of total conversions on average over this same period. Moreover, for the one measure, P-7C, that should include non-coordinated hot cuts, not only is the volume small, but based on the measurement impact assessment included in the January 2004 Notice (filed December 1, 2003) for May 2003 data, there were only 17 non-coordinated conversions that were not reported, none of which had troubles

Q. WHAT OPERATIONS ACTIVITIES ARE COVERED BY THESE MEASUREMENTS?

A These measurements capture four discrete operational aspects of the hot cut process. The hot cut process is discussed at length in the testimony of BellSouth witness Ken Ainsworth including the activities briefly described here. The first measure P-7, *Coordinated Customer Conversions Interval*, is used to report the time interval from the point at which BellSouth disconnects an unbundled loop from the BellSouth switch until the loop is cross connected to the CLEC collocation space The interval within which

BellSouth is expected to complete the cutover of a given loop is 15 minutes and, in order to meet the requirements of this metric, BellSouth must complete the cutover of 95% of the unbundled loops within this 15 minute standard The 15-minute standard does not include the time to notify the CLEC. BellSouth has an objective, however, to notify the CLEC within 5 minutes of completion of coordinated hot cuts BellSouth consistently meets this objective because the Customer Wholesale Interconnect Network Services (CWINS) center monitors each coordinated hot cut and knows when it is completed so that the CLEC can be notified BellSouth's performance related to this notification interval is addressed in the testimony of BellSouth witness Mr. Ken Ainsworth.

While measure P-7 captures the time required to complete the cutover, measure P-7A, *Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval*, provides an indication of whether or not BellSouth began the cutover in a timely matter Specifically, for cutovers that do not involve Integrated Digital Loop Carrier (IDLC), BellSouth must begin the cut within 15 minutes of the scheduled start time. Therefore, for non-IDLC applications, if BellSouth begins the cutover more than 15 minutes <u>before</u> the scheduled start time or more than 15 minutes <u>after</u> the scheduled start time, the metric is considered missed. When IDLC is involved BellSouth is required to begin the cut within a 4-hour window centered on the scheduled start time In this case, if BellSouth begins the cutover more than 2 hours <u>before</u> the scheduled start time or more than 2 hours <u>after</u> the scheduled start time, the metric is

considered missed. As recognized by the Authority, the 4-hour window on hot cuts involving IDLC is necessary because of the additional work activities required to begin this type of hot cut

Measure P-7B, *Coordinated Customer Conversions – Average Recovery Time*, addresses those situations where a service outage due to the cutover is isolated to BellSouth's side of network, prior to completion of the service order. The time that it takes BellSouth to resolve the service outage after notification by the CLEC is reported via this measure Beginning in July 2003, the pursuant to the revised SQM, the average recovery time was required to be 5 hours or less.

Finally, measure P-7C, *Hot Cut Conversions - % Provisioning Troubles Received within 7 Days of a Completed Service Order*, is designed to assess the quality of the work performed for coordinated cutovers by capturing the number of troubles that occur within 7 days of the cutover. This measure is calculated as the percentage of circuits associated with coordinated conversions that incur troubles within 7 days of the service order completion The standard established pursuant to the revised SQM, effective July 2003, requires that CLECs should experience troubles on only 3% or less of the circuits involved in the coordinated cutover

In summary, BellSouth's current set of measurements is comprehensive with respect to customer conversions/hot cuts, in that the data reflect performance on the important aspects of the process for the overwhelming

majority of hot cuts. Particularly, BellSouth measures and reports: (1) whether the cutover started on time (P-7A: *Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval*); (2) how long it takes to complete the cutover (P-7 *Coordinated Customer Conversions Interval*); (3) if service outage problems are encountered after the cutover, but before service order completion, the time it takes to resolve the problem (P-7B: *Coordinated Customer Conversions – Average Recovery Time*); and (4) after the service order is completed, any problems identified within a short time after the cutover associated with circuits involved in the cutover (P-7C *Hot Cut Conversions - % Provisioning Troubles Received within 7 Days of a Completed Service Order*).

Q. WOULD YOU DESCRIBE BELLSOUTH'S OVERALL PERFORMANCE FOR HOT CUTS FOR THE PAST 11 MONTHS IN TENNESSEE?

A. BellSouth's hot cut performance is exemplary. Exhibit AJV-1 contains detailed information regarding hot cut performance. Reviewing the three SQM Hot Cutover measures that capture the timeliness and accuracy of the conversion (Coordinated Customer Conversions, Hot Cut Timeliness and Provisioning Troubles within 7 days of Cutover), BellSouth met the standard for 59 of the 62 sub-metrics with CLEC activity from December 2002 through October 2003. BellSouth met the standard for 95% of all sub-metrics with CLEC activity for Hot Cuts for the past 11 months in Tennessee. The following table lists the number of sub-metrics with

CLEC activity that met the ordered benchmark, the total number of sub-metrics with CLEC activity, and the corresponding percentage of sub-metrics meeting the ordered benchmark for the past 11 months.

% OF HOT CUT SUB-METRICS MEETING BENCHMARK			
Month	**Total # Submetrics with CLEC Activity**	**# Submetrics Meeting Benchmark**	**Percentage of Submetrics Meeting Benchmark**
Dec '02	6	5	83%
Jan '03	4	4	100%
Feb '03	5	4	80%
Mar '03	6	6	100%
Apr '03	5	5	100%
May '03	6	5	83%
Jun '03	6	6	100%
Jul '03	6	6	100%
Aug '03	6	6	100%
Sep '03	7	7	100%
Oct '03	5	5	100%
TOTAL	**62**	**59**	**95%**

Q. HOW DID BELLSOUTH PERFORM IN MEETING THE 15-MINUTE BENCHMARK FOR COORDINATED CUSTOMER CONVERSIONS OVER THE PAST 11 MONTHS IN TENNESSEE?

A. The following table provides a month-by-month breakdown of the coordinated customer conversions for Tennessee from December 2002 through October 2003 BellSouth met the performance standard for over 99.5% of all coordinated conversions during this period and averaged 2 minutes and 47 seconds per cutover for the over 2,000 coordinated conversions. As already noted, the Coordinated Customer Conversion

Interval does not include the time to notify the CLEC As will be discussed later in this testimony, because the CLECs have requested that the interval include the time to notify, BellSouth proposes to modify measure P-7, Coordinated Customer Conversion Interval, to include the time to notify the CLEC that the conversion has been completed. This modification to the measurement should only impact the performance results slightly, if at all, because the CWINS center notifies the CLEC within 5 minutes of the cutover.

% OF COORDINATED CUSTOMER CONVERSIONS MEETING BENCHMARK				
Month	**Total # Hot Cuts**	**# Hot Cuts Meeting Benchmark**	**Percentage Meeting Benchmark**	**Average Cutover Interval**
Dec '02	211	211	100.0%	2:40
Jan '03	204	200	98.0%	2:59
Feb '03	144	144	100.0%	2:25
Mar '03	234	229	97.9%	3:37
Apr '03	314	314	100.0%	2:44
May '03	314	312	99 4%	3:03
Jun '03	201	201	100.0%	2:42
Jul '03	187	187	100.0%	2:30
Aug '03	195	195	100.0%	2:03
Sep '03	165	165	100.0%	2:51
Oct '03	197	197	100 0%	2.40
TOTAL	**2,366**	**2,355**	**99.5%**	**2:47**

II. BELLSOUTH'S PROPOSED ENHANCEMENTS TO THE PERFORMANCE MEASURES AND SEEM PLAN

Q. DOES BELLSOUTH PLAN TO MAKE CHANGES TO ITS PERFORMANCE MEASUREMENTS TO ADDRESS BATCH HOT CUTS SPECIFICALLY IF IT RECEIVES RELIEF FROM UNBUNDLED CIRCUIT SWITCHING?

A. Yes. There are a few hot cut processes that are either not covered by the existing measurements or, given the anticipated volume of hot cuts if switching is no longer required, that the Authority may want to monitor more closely. First, BellSouth does not currently measure certain pre-ordering and ordering functions for Batch Hot Cuts, in part because they are project managed Therefore, BellSouth proposes to add a new Pre-Ordering measure to capture its performance in the initial stage of processing a CLEC request for a batch conversion. BellSouth also proposes to modify four of the Ordering measurements to include project managed batch hot cuts that were previously excluded. BellSouth's Exhibit AJV-2 contains the proposed changes to the current Tennessee performance measurements to incorporate batch hot cuts. Additions to the existing performance measures are shown in Exhibit AJV-2 as red underlined text and deletions are as blue strike-through. For the new measures that BellSouth proposes to add to the Tennessee SQM, the entire SQM page is reflected as red underlined text in the exhibit.

As previously discussed, the existing hot cut timeliness measures P-7 and P-7A only record data for coordinated hot cuts. In fact, the data necessary to produce these measurements are only available for coordinated hot cuts. It is not clear whether CLECs will elect to use coordinated or non-coordinated hot cuts to convert customers from UNE-P to UNE-L if switching is no longer a UNE. Therefore, BellSouth proposes to add one new provisioning measure to capture BellSouth's performance on non-coordinated cutovers. Finally, there is one change in the existing coordinated customer conversion interval measure to include the time to notify the CLEC that the cutover has been completed.

Q. PLEASE DESCRIBE A BATCH HOT CUT FROM THE PERSPECTIVE OF WHAT BELLSOUTH PROPOSES TO MEASURE.

A. Mr. Ainsworth describes batch hot cuts in detail, so I will only briefly focus on those aspects of the batch hot cut process that would be measured. Also, it should be noted that throughout this testimony the terms "batch" hot cut and "bulk" hot cut will be used interchangeably.

A batch hot cut is like any other hot cut except for the preordering and a few of the ordering processes For batch hot cuts, the process is designed to facilitate ordering large volumes of loop hot cuts simultaneously. The batch hot cut process begins with submission of a Bulk Migration Notification Form by the CLEC wherein due dates for many different accounts can be requested at one time Submission of this form

initiates the preordering process and a unique project number is assigned ending in the characters "BULK".

For batch hot cuts, a project manager is assigned at the time of the CLEC's initial request, and follows the project until completion BellSouth forwards the information provided by the CLEC to each of the groups required to analyze the data and establish due dates, which are returned to the CLEC. BellSouth then provides this information to the CLEC.

After the CLEC receives the preordering information from BellSouth, the CLEC begins placing orders. The CLEC can consolidate UNE-P hot cuts for up to 99 accounts, with each account containing up to 25 lines on a single batch LSR. BellSouth's systems convert each batch LSR into single LSRs for processing and service order issuance. Each individual LSR spawned by the batch LSR contains the unique project number assigned during the preordering process The individual LSRs resulting from the batch LSR are treated similarly to any other hot cut LSR for operational purposes.

Q. TO WHAT EXTENT ARE BATCH HOT CUT RESULTS INCLUDED IN THE EXISTING PERFORMANCE MEASURES AND THE SEEM PLAN?

A While batch hot cuts are not currently included in ordering measurement results, they are reflected in other measurements where applicable. Specifically, coordinated batch hot cuts would be included in the four hot

cuts measures that were discussed previously (*i e.*, P-7, P-7A, P-7B and P-7C). For designed loops, CLECs are required to request order coordination on batch hot cuts. In cases where the loops ordered are not designed, CLECs can order batch hot cuts with or without order coordination. Therefore, the measures P-7, P-7A and P-7B, would currently include batch hot cuts except in those case where CLECs choose not to request order coordination for non-design loops. Both coordinated and non-coordinated batch hot cuts also show up in measures such as: P-3, *Percent Missed Installation Appointments*; P-9, *Percent Provisioning Troubles within 30 Days of Service Order Completion*; M&R-1, *Missed Repair Appointments*; M&R-2: *Customer Trouble Report Rate*, and M&R-3, *Maintenance Average Duration*

Further, for situations where the hot cut is associated with a number port (this permits the telephone number to be ported so that the end user can keep the same telephone number with the new carrier), LNP measures also apply. Specifically, hot cuts are already included in LNP measurements such as: P-13B, *LNP - Percent Out of Service < 60 Minutes*; P-13C, *Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date*; P-13D, *LNP- Average Disconnect Timeliness Interval (Non-Trigger)*

Q. PLEASE DISCUSS THE NEW PRE-ORDERING MEASUREMENT THAT BELLSOUTH PLANS TO ADD TO ITS SQM, IF IT RECEIVES UNBUNDLED SWITCHING RELIEF.

A. BellSouth proposes to add a Pre-Ordering measure, PO-3, *UNE Bulk Migration – Response Time*, if it receives unbundled switching relief. This proposed measurement is designed to capture the time that it takes for BellSouth to provide the requesting CLEC with a response to its UNE Bulk Migration Notification Form, which begins prior to the creation of an LSR The submittal of this form by the CLEC triggers the assignment of a project manager to this request who handles providing a timely response back to the CLEC. The interval being measured begins upon receipt of the UNE Bulk Migration Notification Form by BellSouth and ends when a response is transmitted back to the CLEC. To meet the performance standard, BellSouth must provide a response to the CLEC within 7 business days for bulk migration requests of less than 99 individual LSRs and within 10 business days for 100 to 199 individual LSRs. Because the intervals for 200 or more LSRs are negotiated, no benchmark applies The details of this measure are included in Exhibit AJV-2. Because processing of the Bulk Migration Notification Form is the only Ordering or Pre-Ordering process that is not covered by existing measurements, no additional measurements of ordering or pre-ordering are proposed.

Q. WHAT REVISIONS TO ORDERING MEASURES ARE BEING PROPOSED BY BELLSOUTH?

A. As previously discussed, batch hot cuts are currently excluded from measures of the Ordering processes because they are project managed. Project managed orders are those orders which require more detailed and specific information from the CLEC in order to manage the cycle from service request to service completion Specifically, these orders are of a level of complexity that requires the assignment of a project manager to oversee the order from beginning to end The Ordering measures carry an exclusion for orders that are project managed because project managed orders are not considered in the normal flow of order types that can be responded to by BellSouth according to standard and well-established time frames. Typically, the timeframes for responding to such orders are non-standard, so they do not lend themselves to evaluation via an objective standard. Consequently, ordering data produced for the typical project managed order does not provide any insight on the quality of BellSouth's performance.

Batch hot cuts can be included in the ordering measures, however, even though they are project managed because project management of Batch migrations does not affect the timeframes for processing the underlying LSRs after they are generated. Thus, the variability and uniqueness normally associated with project managed LSRs generally do not apply to Batch migrations once the individual LSRs are generated. These LSRs

also have a unique project identifier that facilitates inclusion in the ordering measures by permitting them to be separately identified from other projects. BellSouth proposes to modify the exclusion for projects in the ordering measures to include batch migration LSRs. This Ordering measurement change is reflected in the Tennessee SQM for the following measures, attached as Exhibit AJV-2:

- O-7: Percent Rejected Service Requests
- O-8: Reject Interval
- O-9: Firm Order Confirmation Timeliness
- O-11: Firm Order Confirmation and Reject Response Completeness

An additional change is required to account for the unique type of LSR that a CLEC can submit in this case. Instead of submitting separate LSRs for each account that the CLEC wants to transfer, up to 99 accounts can be submitted on a single "Global" LSR. BellSouth's systems convert this Global LSR into multiple separate LSRs needed to create service orders to provision the services. This process is unique to batch migrations. For these batch migration LSRs, the start time will be receipt of the Global LSR, so the same incoming timestamp will apply to each LSR spawned by the Global LSR. The Global LSR, however, should not be included in the count of LSRs because the individual LSRs resulting from the Global LSR are the items that receive the reject or FOC responses that are tracked in reported results. The ordering measurements O-8 and O-9 should be modified to reflect this fact.

Q. DOES BELLSOUTH PROPOSE ANY NEW MEASUREMENTS FOR THE PROVISIONING PROCESS?

A. Yes. To display whether BellSouth meets its provisioning obligations for noncoordinated hot cuts, a new provisioning measure, P-7E, *Non-Coordinated Customer Conversions - % Completed and Notified on Due Date*, is proposed.

Specifically, this new measure would provide results indicating whether BellSouth completes a non-coordinated customer conversion on the due date and provides notification of completion to the CLEC on the same date This is the obligation that BellSouth makes to CLECs on non-coordinated hot cuts. This measure is also proposed to be included in both Tier 1and Tier 2 of SEEM

Q WHAT DOES BELLSOUTH PROPOSE TO CHANGE FOR EXISTING PROVISIONING MEASURES?

A. The relevant Provisioning measures currently include projects and, consequently, also include batch hot cuts Thus, there is no need to change the existing provisioning measures to capture batch hot cuts. BellSouth is, however, proposing the modification of measure P-7, Coordinated Customer Conversions Interval, to include the time to notify the CLEC that BellSouth has completed the conversion (see Exhibit AJV-2). This is an issue raised by the CLECs that BellSouth's hot cut interval

does not include the time to notify the CLEC that the transfer is complete.

The current established standard for the conversion interval is 15 minutes per line. The objective time to notify the CLEC that the cutover has been completed is 5 minutes. Therefore, in adjusting this measure to include the time to notify the CLEC, the proposed standard conversions interval is changed from 15 minutes per line to 20 minutes per line. The proposed changes to this measure are included in Exhibit AJV-2.

Q. YOU HAVE PROPOSED CHANGES TO CERTAIN MEASURES OR THE ADDITION OF MEASURES IN THE PRE-ORDERING, ORDERING AND PROVISIONING CATEGORIES, BUT NO CHANGES TO MAINTENANCE AND REPAIR. WHY IS THIS?

A While there are certain activities particular to batch hot cuts in some of the Pre-Ordering, Ordering and Provisioning processes, there is nothing in the Maintenance & Repair process that would distinguish a line associated with a batch hot cut from any other line. Once the lines associated with the batch hot cut have been converted, the process necessary to report a line trouble and the process necessary to resolve a line trouble are exactly the same as for any other lines.

Q. HOW WILL BELLSOUTH'S PROPOSED CHANGES TO THE PERFORMANCE MEASUREMENTS IMPACT SEEM?

A Any existing measurements that BellSouth has proposed to change that are currently in SEEM will remain in SEEM. Any new data that will be reflected in those measurements will be added to one of the existing SEEM disaggregations. The new measurement, P-7E, that BellSouth proposes to add to the Tennessee SQM is also proposed as a new measurement in the SEEM plan in both Tier 1 and Tier 2 Exhibit AJV-3 includes the proposed changes to the SEEM plan and are reflected as red underlined text.

Q. HOW WOULD BELLSOUTH PROPOSE TO ADDRESS PROCESS CHANGES THAT WOULD AFFECT MEASUREMENTS?

A BellSouth is reviewing several enhancements to the batch hot cut process. In this testimony, I proposed two new measurements, PO-3 and P-7E, and changes to measures O-7, O-8, O-9, O-11 and P-7. To the extent that process enhancements are made that affect these measurements, BellSouth will, of course, modify its proposed measurement changes and additions accordingly

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

DISCUSSION OF PERFORMANCE MEASUREMENTS DATA FOR HOT CUTS

TABLE OF CONTENTS

TENNESSEE PERFORMANCE MEASUREMENT DATA DEMONSTRATE THAT BELLSOUTH PROVIDES NONDISCRIMINATORY PERFORMANCE FOR HOT CUTS

A. INTRODUCTION

1 Hot Cut data for December 2002 through October 2003 are included with this Exhibit as Attachment 1. These performance data indicate whether each sub-metric demonstrates parity performance by comparing the CLEC data to the applicable retail analogue or benchmark as stated in the SQM.

2. A high level summary of the measurement results indicates the high level of service that BellSouth provides as follows. BellSouth met the Coordinated Customer Conversion 15-minute benchmark for over 99.5% of all cutovers in the past 11 months in Tennessee. This measurement calculates the average time it takes to disconnect an unbundled loop from the BellSouth switch and cross connect it to the CLEC equipment

3. BellSouth has maintained high performance levels over the past eleven months in Tennessee for all of its customers, both retail and wholesale. The TRA established high performance thresholds for BellSouth to meet.

B. SUMMARY OF MEASUREMENTS

4. The SQM Hot Cut measures discussed in this Exhibit include the following:

   - (P-7) Coordinated Customer Conversions
   - (P-7A) Hot Cut Timeliness
   - (P-7C) % Provisioning Troubles within 7 days of Hot Cut

5. Each month BellSouth files a Notice of Proposed Changes to performance measurements and holds a conference call to discuss them with the CLECs Any changes in the method of calculating data are listed in the Notice. BellSouth has notified the TRA and the CLECs of upcoming changes to its measures for November through March data months that could affect data in the months used in this analysis The notification items potentially affecting the data included with this exhibit are as follows:

November 2003

No Changes affecting Hot Cut measures

December 2003

Provisioning Measurements

(5) Affected Measure in Exhibit: P-7

Description of Change: Currently, hot cuts with durations equal to fifteen minutes are being counted as misses. BellSouth proposes counting these hot cuts as met, consistent with the SQM. This proposed change was Item (2) on the Preliminary December 2003 Data Notification tiled on October 1,2003. (RQ4326)

Impact of change. Regional results for June 2003 would increase by 0.28%.

January 2004

Provisioning Measurements

(6) *Affected Measures in Exhibit*: P-7C

Description of Change: Currently, BellSouth does not include non-coordinated conversions for the Provisioning Trouble in 7 Days Measure. BellSouth proposes to include these orders as required by the SQM This proposed change was Item (5) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4128)

Impact of Change: For May 2003, there were 17 non-coordinated conversions that were not reported, none of which had troubles.

February 2004

Provisioning Measurements

(5) *Affected Measures*: All Provisioning Measures

Description of Change Certain field identifiers (FIDs) that correspond to ADSL products are not being classified as ADSL. BellSouth proposes to correct this problem. This proposed change was Item (6) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4624)

Impact of Change: For August 2003, 104 wholesale and retail records in the region would be considered ADSL products, which is an increase of .10% in the number of ADSL records.

March 2004

No Changes affecting Hot Cut measures

6. None of the above notice items impacted the data to the extent that reposting would be required.

7 The following paragraphs provide empirical evidence that BellSouth's Hot Cut performance in Tennessee demonstrates nondiscriminatory action for the CLECs. Except where noted, all measures and sub-metrics indicate state level results for the CLEC aggregate and BellSouth retail analogues

C. BELLSOUTH'S HOT CUT PERFORMANCE IN TENNESSEE

8. Attachment 1 to this Exhibit provides detailed data for BellSouth's performance measurements for Hot Cuts that provide comparative performance data to facilitate the evaluation of compliance with the section 271 requirements. Attachment 1 consists of the charts for the measurements referenced in the remainder of this exhibit Each chart has a number, such as B 2.15 and this number is included with the heading on the following paragraphs

Coordinated Conversions – Hot Cuts

9. BellSouth's SQM measures included with this Exhibit provide the Tennessee Authority sufficient evidence to evaluate the extent to which BellSouth complies with the Authority's requirements regarding the timeliness of coordinated cutovers A cursory review of the data shows that BellSouth met 59 of the 62 sub-metrics with CLEC activity from December 2002 through October 2003. This strong performance

indicated by a cursory view is further supported by the more detailed analyses that follow and indicates BellSouth's commitment to performing hot cuts timely and accurately for CLECs in Tennessee. These results, both individually and collectively, demonstrate that BellSouth's performance does not pose a barrier for market entry for the CLECs.

Coordinated Customer Conversions. (B.2 15)

10. This report measures the average elapsed time it takes to disconnect an unbundled loop from the BellSouth switch and cross connect it to the CLEC equipment For the coordinated conversions (i.e., hot cuts), BellSouth in Tennessee met the 15-minute benchmark for 2,355 of the 2,366 scheduled conversions (lines) or 99.54% for the 11-month period. The average interval for each cutover was 2:47 minutes (minutes· seconds) during this period

% Hot Cuts > 15 minutes Early (B.2.16)

11. This measure reflects the extent to which BellSouth begins a hot cut more than 15 minutes before the agreed upon start time. During the period of December 2002 through October 2003, BellSouth in Tennessee performed 744 hot cuts (orders). This measure includes the actual number of orders instead of the individual lines as shown in the Coordinated Customer Conversions measure B.2.15 above. The order has a specific start time to begin the cutover of the series of lines on that order. For the entire 11-month period, there were only 8 orders with an actual beginning time in

excess of the 15 minutes allowed. The resulting performance met or exceeded the 5% benchmark in each of the 11 months.

Hot Cut Timeliness (B 2.17)

12 This category measures the percentage of orders where the cut begins within 15 minutes of the requested start time of the order. There were a total of 744 hot cuts (orders) during December 2002 through October 2003, and 99 54% of these were within the 15-minute cutover criteria There were no missed sub-metrics out of the 26 with CLEC activity during the period.

% Hot Cuts > 15 minutes Late (B.2.18)

13. This measure reflects the extent to which BellSouth begins a hot cut more than 15 minutes after the agreed upon start time. During the period of December 2002 through October 2003, BellSouth in Tennessee performed 744 hot cuts (orders). There were only 2 late cutovers over the period, which met or exceeded the 5% benchmark in each of the 11 months.

% Provisioning Troubles within 7 days of the Hot Cut (B.2.23)

14. The percent of completed service orders that had a trouble reported within 7 days of completion associated with a Hot Cut Conversion measures the quality and accuracy of Coordinated Customer Conversion activities. BellSouth in Tennessee met the

Commission established benchmark for 22 of the 25 sub-metrics that had CLEC activity in December 2002 through October 2003. In February 2003, BellSouth received a total of 11 trouble reports for the 204 total completed hot cut service order circuits (5.39%) for the UNE Loop Design dispatch category While this performance did not meet the 5% benchmark, no systemic issues were identified for any of the 11 reports received for July and the volume was too low to indicate any problems with performance. The other two missed sub-metrics had only 1 trouble each with volumes too low to indicate any problems with performance.

15 This concludes the data analysis associated with BellSouth's performance for Hot Cuts.

Tennessee III, November 2002 - October 2003
Unbundled Network Elements - Provisioning
Coordinated Customers Conversions

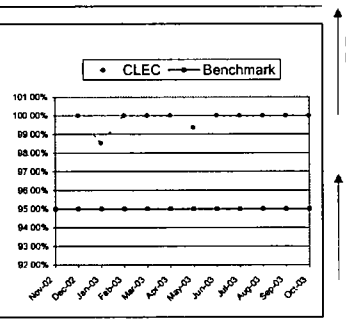
(% of Coordinated Time Intervals Worked to Cutover Loops (BST-CLEC) within 15 min)

Numerator indicates total number of coordinated loop cutovers performed within 15 min for this disaggregation in the reporting period

Volume indicates the number of items cut for this disaggregation in the reporting period

B.2 15 2 **Loops with LNP/TN (%)**

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02	95.00%								
Dec-02	95.00%			100.00%	211	211			YES
Jan-03	95.00%			98.53%	201	204			YES
Feb-03	95.00%			100.00%	144	144			YES
Mar 03	95.00%			100.00%	234	234			YES
Apr-03	95.00%			100.00%	314	314			YES
May-03	95.00%			99.36%	312	314			YES
Jun-03	95.00%			100.00%	201	201			YES
Jul-03	95.00%			100.00%	187	187			YES
Aug-03	95.00%			100.00%	195	195			YES
Sep-03	95.00%			100.00%	165	165			YES
Oct-03	95.00%			100.00%	197	197			YES



Better Performance

Better Performance

Tennessee III, November 2002 - October 2003
Unbundled Network Elements - Provisioning
Hot Cut Timeliness

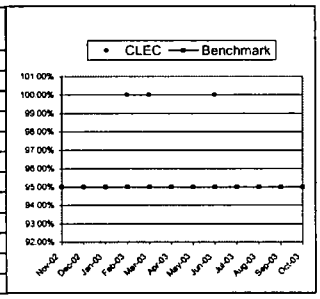
(% of Hot Cuts Performed within 15 Minutes of Scheduled Cut)

Numerator indicates total number of hot cuts performed within 15 minutes of scheduled cut in the reporting period

Volume indicates total number of hot cut service orders completed for this disaggregation in the reporting period

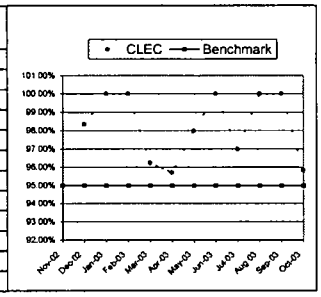
B 2 17 1 Time-Specific SL1/TN (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02	95 00%								
Dec 02	95 00%								
Jan-03	95 00%								
Feb-03	95 00%			100 00%	1	1			YES
Mar 03	95 00%			100 00%	1	1			YES
Apr 03	95 00%								
May-03	95 00%								
Jun-03	95 00%			100 00%	1	1			YES
Jul-03	95 00%								
Aug 03	95 00%								
Sep-03	95 00%								
Oct-03	95 00%								



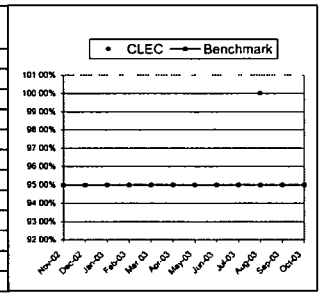
B 2 17 2 Time-Specific SL2/TN (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02	95 00%								
Dec-02	95 00%			98 33%	59	60			YES
Jan-03	95 00%			100 00%	56	56			YES
Feb-03	95 00%			100 00%	36	36			YES
Mar 03	95 00%			96 23%	51	53			YES
Apr-03	95 00%			95 71%	67	70			YES
May 03	95 00%			97 98%	97	99			YES
Jun-03	95 00%			100 00%	45	45			YES
Jul-03	95 00%			96 97%	32	33			YES
Aug 03	95 00%			100 00%	54	54			YES
Sep-03	95 00%			100 00%	27	27			YES
Oct-03	95 00%			95 83%	23	24			YES



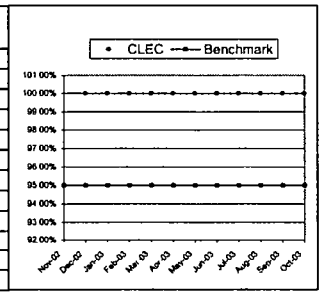
B 2 17 3 Non-Time Specific SL1/TN (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov-02	95 00%								
Dec-02	95 00%								
Jan-03	95 00%								
Feb-03	95 00%								
Mar-03	95 00%								
Apr-03	95.00%								
May-03	95 00%								
Jun-03	95 00%								
Jul-03	95 00%								
Aug-03	95 00%			100.00%	1	1			YES
Sep-03	95 00%								
Oct-03	95.00%								



B 2 17 4 Non-Time Specific SL2/TN (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02	95 00%								
Dec-02	95 00%			100 00%	13	13			YES
Jan-03	95 00%			100 00%	14	14			YES
Feb-03	95 00%			100 00%	6	6			YES
Mar 03	95 00%			100 00%	16	16			YES
Apr-03	95.00%			100.00%	25	25			YES
May-03	95 00%			100 00%	20	20			YES
Jun-03	95 00%			100.00%	9	9			YES
Jul-03	95 00%			100 00%	16	16			YES
Aug-03	95 00%			100 00%	20	20			YES
Sep-03	95 00%			100 00%	17	17			YES
Oct-03	95.00%			100 00%	27	27			YES

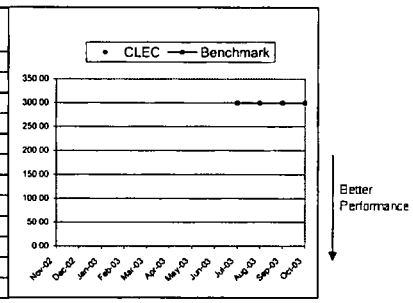


Tennessee III, November 2002 - October 2003
Unbundled Network Elements - Provisioning
Average Recovery Time - CCC

(Time between notification by BellSouth of a service outage found that can be isolated to the BellSouth side of the network)
Numerator indicates date and time trouble is closed by CLEC minus date and time the initial trouble is opened with BellSouth
Volume indicates total number of troubles referred to BellSouth in the reporting period

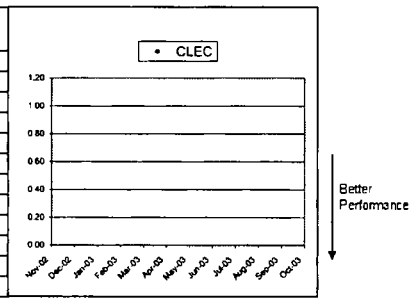
B 2 22 1 **Loops with INP/TN (minutes)**

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02									
Dec-02									
Jan-03									
Feb-03									
Mar 03									
Apr-03									
May-03									
Jun-03									
Jul-03	300.00								
Aug-03	300 00								
Sep-03	300 00								
Oct-03	300 00								



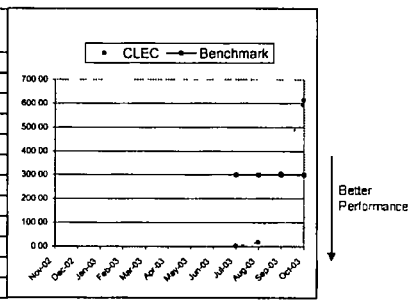
B 2 22 1 X **Loops with INP/TN (minutes)**

	BST	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02									Diagnostic
Dec-02									Diagnostic
Jan-03									Diagnostic
Feb-03									Diagnostic
Mar 03									Diagnostic
Apr-03									Diagnostic
May-03									Diagnostic
Jun 03									Diagnostic
Jul-03									Diagnostic
Aug 03									Diagnostic
Sep-03									Diagnostic
Oct-03									Diagnostic



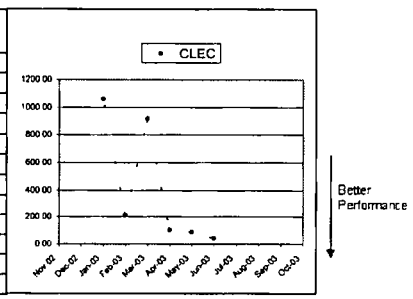
B 2 22 2 **Loops with LNP/TN (minutes)**

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02									
Dec-02									
Jan-03									
Feb-03									
Mar-03									
Apr-03									
May-03									
Jun-03									
Jul 03	300 00			3.00	3	1			YES
Aug-03	300 00			18.00	18	1			YES
Sep-03	300 00			305 20	1 526	5			NO
Oct-03	300 00			614.33	1 843	3			NO



B 2 22 2 X **Loops with LNP/TN (minutes)**

	BST	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov-02									Diagnostic
Dec 02									Diagnostic
Jan-03				1058 00	2 116	2			Diagnostic
Feb-03				213 00	426	2			Diagnostic
Mar 03				918 00	3 672	4			Diagnostic
Apr 03				102.50	205	2			Diagnostic
May-03				89 00	178	2			Diagnostic
Jun-03				41 00	41	1			Diagnostic
Jul-03									Diagnostic
Aug-03									Diagnostic
Sep-03									Diagnostic
Oct 03									Diagnostic



Tennessee III, November 2002 - October 2003
Unbundled Network Elements - Provisioning
% Provisioning Troubles within 7 Days - Hot Cuts

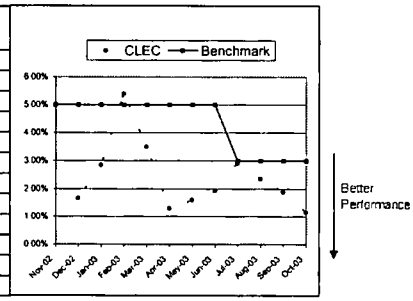
(% of Trouble Reports Received within 7 Days of Hot Cut Service Order Completion)

Numerator indicates total number of hot cut circuits with a trouble report within 7 days following service order completion

Volume indicates total number of cut counts for this disaggregation in the previous reporting period

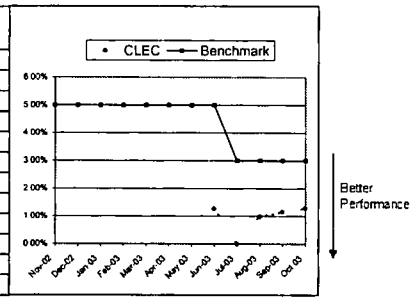
B 2 23 1 1 UNE Loop Design/Dispatch/TN (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02	5.00%								
Dec-02	5.00%			1.65%	2	121			YES
Jan-03	5.00%			2.84%	6	211			YES
Feb-03	5.00%			5.39%	11	204			NO
Mar 03	5.00%			3.50%	5	143			YES
Apr-03	5.00%			1.29%	3	233			YES
May-03	5.00%			1.59%	5	314			YES
Jun-03	5.00%			1.92%	3	156			YES
Jul-03	3.00%			2.92%	4	137			YES
Aug 03	3.00%			2.35%	2	85			YES
Sep-03	3.00%			1.89%	2	106			YES
Oct-03	3.00%			1.16%	1	87			YES



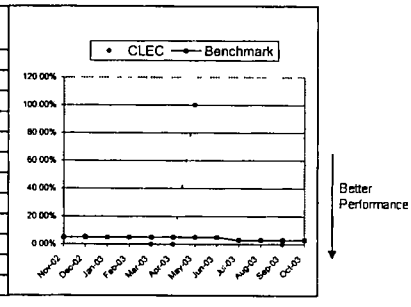
B 2 23 1 2 UNE Loop Design/Non Dispatch/TN (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov-02	5.00%								
Dec 02	5.00%								
Jan-03	5.00%								
Feb-03	5.00%								
Mar 03	5.00%								
Apr-03	5.00%								
May-03	5.00%								
Jun-03	5.00%			1.27%	2	158			YES
Jul-03	3.00%			0.00%	0	63			YES
Aug-03	3.00%			0.98%	1	102			YES
Sep-03	3.00%			1.15%	1	87			YES
Oct-03	3.00%			1.28%	1	78			YES



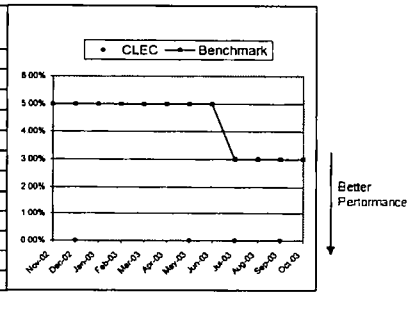
B 2 23 2 1 UNE Loop Non-Design/Dispatch/TN (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov 02	5.00%								
Dec 02	5.00%			5.56%	1	18			NO
Jan-03	5.00%								
Feb-03	5.00%								
Mar 03	5.00%			0.00%	0	1			YES
Apr-03	5.00%			0.00%	0	1			YES
May-03	5.00%			100.00%	1	1			NO
Jun-03	5.00%								
Jul-03	3.00%								
Aug-03	3.00%								
Sep-03	3.00%			0.00%	0	1			YES
Oct 03	3.00%								



B 2 23 2 2 UNE Loop Non-Design/Non-Dispatch/TN (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Nov-02	5.00%								
Dec-02	5.00%			0.00%	0	1			YES
Jan-03	5.00%								
Feb-03	5.00%								
Mar 03	5.00%								
Apr-03	5.00%								
May-03	5.00%			0.00%	0	1			YES
Jun-03	5.00%								
Jul-03	3.00%			0.00%	0	1			YES
Aug-03	3.00%								
Sep-03	3.00%			0.00%	0	1			YES
Oct-03	3.00%								



BELLSOUTH®

Tennessee
Proposed SQM Changes

Exhibit No. AJV-2

Docket No. 03-00526

Issue Date: February 27, 2004

PO-3: UNE Bulk Migration - Response Time

Definition

This report measures the average interval and percent within the interval from the submission of a UNE Bulk Migration Notification Form to the distribution of Bulk Notification Form including negotiated Due Date back to the CLEC

Exclusions

- Projects that are not identified as UNE Bulk Migration
- Designated Holidays are excluded from the interval calculation
- Weekends are excluded from the interval calculation
- Canceled Requests

Business Rules

The CLEC Bulk Migration process includes the submission of a Bulk Migration Notification Form to BellSouth via email. The project manager negotiates Due Date, assigns Bulk Order Package Identification (BOPI) number, and validates related PONs in the Bulk package. BellSouth then returns the Bulk Notification Form including negotiated Due Date to the CLEC.

The "Receive Date" is defined as the date the Bulk Migration Notification Form is received by the BellSouth Project Manager via email. It is counted as day Zero. Bulk Migration "Return Date" is defined as the date BellSouth returns a response. The interval calculation is reset to Zero when a CLEC initiated change occurs on the Bulk Migration Notification Form.

This measurement combines three sub-metrics.

1. From receipt of a valid Bulk Migration Notification Form including up to 99 individual telephone numbers to Bulk Notification Form including negotiated Due Date to the CLEC.
2. From receipt of a valid Bulk Migration Notification Form including 100 up to 200 individual telephone numbers to Bulk Notification Form including negotiated Due Date to the CLEC.
3. From receipt of a valid Bulk Migration Notification Form including 201 or more individual telephone numbers to Bulk Notification Form including negotiated Due Date to the CLEC.

Calculation

Response Interval = (a - b)

- a = Date BellSouth Returns a Response
- b = Date the Bulk Migration Notification Form is Received

Average Interval = (c / d)

- c = Sum of all Response Intervals
- d = Total Number of Bulk Migration Notification Forms Received within the Reporting Period

Percent within interval = (e / f) X 100

- e = Total Bulk Migration Notification Forms received within the Interval
- f = Total Number of Bulk Migration Notification Forms Processed within the Reporting Period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
- Intervals for manual Bulk Migration Notification Forms
  0 - <= 99 individual telephone numbers –
  - 0 - <= 7 Business days
  - > 7 Business days
  100 - <= 200 individual telephone numbers –
  - 0 - <= 10 Business days
  - > 10 Business days
  >= 201 individual telephone numbers -
- Average Interval in days

Data Retained

Relating to CLEC Experience

- Report Month
- Total Number of Requests
- Bulk Migration Intervals
- State

Relating to BellSouth Performance

- Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• 0 - <= 99 individual telephone numbers	Benchmark 95% <= 7 Business Days
• 100 - <= 200 individual telephone numbers	Benchmark 95% <= 10 Business Days
• >= 201 individual telephone numbers	Benchmark Diagnostic

SEEM Measure

SEEM	Tier I	Tier II
No		

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	Not Applicable

O-7: Percent Rejected Service Requests

Definition

Percent Rejected Service Request is the percent of total Service Requests [(Local Service Requests (LSRs) or Access Service Requests (ASRs)] received which are rejected due to error or omission Service Requests are considered valid when they are submitted by the CLEC and pass edit checks to insure the data received is correctly formatted and complete

Exclusions

- Service Requests canceled by the CLEC prior to being rejected/clarified
- Fatal Rejects
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc) where identifiable
- LSRs identified as "Projects" with the exception of valid "Project IDs" for UNE-P to UNE Loop Bulk Migrations

Business Rules

Fully Mechanized: An LSR/Service Request is considered "rejected" when it is submitted electronically but does not pass edit checks in the ordering systems (EDI, LENS, TAG, LESOG, LNP Gateway, LAUTO) and is returned to the CLEC without manual intervention There are two types of "Rejects" in the Mechanized category

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR but required fields are either not populated or incorrectly populated and the request is returned to the CLEC before it is considered a valid LSR

Fatal rejects are reported in a separate column, and for informational purposes ONLY They are not considered in the calculation of the percent of total LSRs rejected or the total number of rejected LSRs

An **Auto Clarification** occurs when a valid LSR is electronically submitted but rejected from LESOG or LAUTO because it does not pass further edit checks for order accuracy

Partially Mechanized: A valid LSR, which is electronically submitted (via EDI, LENS, TAG) but cannot be processed electronically and "falls out" for manual handling It is then put into "clarification" and sent back (rejected) to the CLEC

Non-Mechanized: LSRs which are faxed or mailed to the LCSC for processing and "clarified" (rejected) back to the CLEC by the BellSouth service representative

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs) ASRs are submitted to and processed by the Local Interconnection Service Center (LISC) Trunk data is reported as a separate category

Bulk Migrations: Requests for Bulk Migrations will come in to BellSouth via a Global Request The Global Request will be broken down into individual LSRs These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure

Calculation

Percent Rejected Service Requests = (a / b) X 100

- a = Total Number of Service Requests Rejected in the reporting period
- b = Total Number of Service Requests Received in the reporting period

Report Structure

- Fully Mechanized, Partially Mechanized, Non-Mechanized
- Trunks
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State
  - Region
- Product Specific percent Rejected
- Total percent Rejected

Data Retained

Relating to CLEC Experience

- Report Month
- Total Number of LSRs
- Total Number of Rejects
- State and Region
- Total Number of ASRs (Trunks)

Relating to BellSouth Performance

- Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Mechanized, Partially Mechanized and Non-Mechanized	
• Resale – Residence	Diagnostic
• Resale - Business	
• Resale – Design (Special)	
• Resale PBX	
• Resale Centrex	
• Resale ISDN	
• LNP (Standalone)	
• INP (Standalone)	
• 2W Analog Loop Design	
• 2W Analog Loop Non-Design	
• 2W Analog Loop with INP Design	
• 2W Analog Loop with INP Non-Design	
• 2W Analog Loop with LNP Design	
• 2W Analog Loop with LNP Non-Design	
• UNE Digital Loop < DS1	
• UNE Digital Loop >= DS1	
• UNE Loop + Port Combinations	
• UNE Combination Other	
• UNE ISDN Loop	
• UNE Other Design	
• UNE Other Non-Design	
• UNE Line Splitting	
• EELs	
• Switch Ports	
• UNE xDSL (ADSL, HDSL, UCL)	
• Line Sharing	
• Local Interoffice Transport	
• Local Interconnection Trunks	

O-7: Percent Rejected Service Requests

SEEM Measure

SEEM	Tier I	Tier II
No		

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	Not Applicable

O-8: Reject Interval

Definition

Reject Interval is the average reject time from receipt of Service Requests [(Local Service Requests (LSRs) or Access Service Requests (ASRs)] to the distribution of a Reject Service Requests are considered valid when they are submitted by the CLEC and pass edit checks to insure the data received is correctly formatted and complete When there are multiple rejects on a single version of an LSR, the first reject issued is used for the calculation of the interval duration

Exclusions

- Service Requests canceled by CLEC prior to being rejected/clarified
- Fatal Rejects
- Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only
- LSRs which are identified and classified as "Projects" with the exception of valid "Project IDs" for UNE-P to UNE Loop Bulk Migrations

  Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation The excluded time is the time outside of normal operations which can be found at the following website
  http //www interconnection bellsouth com/centers/html/lcsc html

  Local Interconnection Service Center (LISC) - Monday through Friday 4 30 PM until 8 00 AM
  From 4 30 PM Friday until 8 00 AM Monday

  The hours excluded will be altered to reflect changes in the Center operating hours The LCSC will accept faxed LSRs only during posted hours of operation

  The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours

  In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute

Business Rules

The Reject interval is determined for each rejected LSR processed during the reporting period The Reject interval is the elapsed time from when BellSouth receives LSR (date and time stamps in EDI or TAG) until that LSR is rejected back to the CLEC Elapsed time for each LSR (date and time stamps in EDI or TAG) is accumulated for each reporting dimension The accumulated time for each reporting dimension is then divided by the associated total number of rejected LSRs to produce the reject interval distribution

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI translator or TAG) until the LSR is rejected (date and time stamp or reject in EDI translator, or TAG) Auto Clarifications are considered in the Fully Mechanized category

Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI translator or TAG) until it falls out for manual handling The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via EDI translator, or TAG

Non-Mechanized: The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time mailed LSR is received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via LON

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs) ASRs are submitted to and processed by the Local Interconnection Service Center (LISC) Trunk data is reported as a separate category

Bulk Migrations Requests for Bulk Migrations will come in to BellSouth via a Global Request The Global Request will be broken down into individual LSRs These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure For the interval calculations, the original versions of the individual LSRs will be assigned the "start time-stamp" from the receipt of the original Global Request

Calculation

Reject Interval = (a - b)

- a = Date and Time of Service Request Rejection
- b = Date and Time of Service Request Receipt

Average Reject Interval = (c / d)

- c = Sum of all Reject Intervals
- d = Number of Service Requests Rejected in Reporting Period

Reject Interval Distribution = (e / f) X 100

- e = Service Requests Rejected in reported interval
- f = Total Number of Service Requests Rejected in Reporting Period

Report Structure

- Fully Mechanized, Partially Mechanized, Non-Mechanized
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State
  - Region
- Fully Mechanized
  0 - <= 4 minutes
  > 4 - <= 8 minutes
  >8 - <= 12 minutes
  > 12 - <= 60 minutes
  0 - <= 1 hour
  > 1 - <= 4 hours
  > 4 - <= 8 hours
  > 8 - <= 12 hours
  > 12 - <= 16 hours
  > 16 - <= 20 hours
  > 20 - <= 24 hours
  > 24 hours
- Partially Mechanized
  0 - <= 1 hour
  > 1 - <= 4 hours
  > 4 - <= 8 hours
  > 8 - <= 10 hours
  0 - <= 10 hours
  > 10 - <= 18 hours
  0 - <= 18 hours
  > 18 - <= 24 hours
  > 24 hours
- Non-mechanized
  0 - <= 1 hour
  > 1 - <= 4 hours
  > 4 - <= 8 hours

> 8 - <= 12 hours
> 12 - <= 16 hours
> 16 - <= 20 hours
> 20 - <= 24 hours
0 - <= 24 hours
> 24 hours

- Trunks
  0 - <= 36 hours
  > 36 hours
- Average Interval is reported in business hours

Data Retained

Relating to CLEC Experience

- Report Month
- Reject Interval
- Total Number of LSRs
- Total Number of Rejects
- State and Region
- Total Number of ASRs (Trunks)

Relating to BellSouth Performance

- Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale – Residence	Fully Mechanized 97% <= 1 Hour
• Resale – Business	Partially Mechanized 95% <= 10 Hours
• Resale – Design (Special)	Non Mechanized 95% <= 24 Hours
• Resale PBX	
• Resale Centrex	
• Resale ISDN	
• LNP (Standalone)	
• INP (Standalone)	
• 2W Analog Loop Design	
• 2W Analog Loop Non-Design	
• 2W Analog Loop with INP Design	
• 2W Analog Loop with INP Non-Design	
• 2W Analog Loop with LNP Design	
• 2W Analog Loop with LNP Non-Design	
• UNE Digital Loop < DS1	
• UNE Digital Loop >= DS1	
• UNE Loop + Port Combinations	
• UNE Combination Other	
• UNE ISDN Loop	
• UNE Other Design	
• UNE Other Non-Design	
• UNE Line Splitting	
• EELs	
• Switch Ports	
• UNE xDSL (ADSL, HDSL, UCL)	
• Line Sharing	
• Local Interoffice Transport	
• Local Interconnection Trunks	Trunks 95% <= 36 Hours

O-8: Reject Interval

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Fully Mechanized	97% <= 1 hour
• Partially Mechanized	95% <= 10 hours
• Non-Mechanized	95% <= 24 hours
• Local Interconnection Trunks	95% <= 36 hours

O-9: Firm Order Confirmation Timeliness

Definition

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of valid LSR or ASR to distribution of a Firm Order Confirmation The interval will include an electronic facilities check

Exclusions

- Service Requests canceled by CLEC prior to being confirmed
- Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only
- LSRs which are identified and classified as "Projects" with the exception of valid "Project IDs" for UNE-P to UNE Loop Bulk Migrations

  Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation The excluded time is the time outside of normal operations which can be found at the following website
  http //www interconnection bellsouth com/centers/html/lcsc html

  For ASRs processed in the Local Interconnection Service Center (LISC) - From 4 30 PM All hours outside of Monday – Friday 8 00 AM – 4 30 PM CST, should be excluded

  The hours excluded will be altered to reflect changes in the Center operating hours The Centers will accept faxed LSRs only during posted hours of operation

  The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours

  In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute

Business Rules

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via EDI translator or TAG

Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, or TAG) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via EDI translator, or TAG

Non-Mechanized: The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs) ASRs are submitted to and processed by the Local Interconnection Service Center (LISC) The elapsed time is measured from receipt of a valid ASR (date and time stamp of a FAX or paper ASR received in the LISC) until the appropriate orders are issued by a BellSouth representative and a FOC issued in EXACT Trunk data is reported as a separate category

Bulk Migrations: Requests for Bulk Migrations will come in to BellSouth via a Global Request The Global Request will be broken down into individual LSRs These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure For the interval calculations, the original versions of the individual LSRs will be assigned the "start time-stamp" from the receipt of the original Global Request

. **Note:** When multiple FOCs occur on a single version of an LSR, the first FOC is used to measure the interval

Calculation

Firm Order Confirmation Interval = (a - b)

- a = Date and Time of Firm Order Confirmation
- b = Date and Time of Service Request Receipt

Average FOC Interval = (c / d)

- c = Sum of all Firm Order Confirmation Times
- d = Number of Service Requests Confirmed in Reporting Period

FOC Interval Distribution = (e / f) X 100

- e = Service Requests Confirmed in Designated Interval
- f = Total Service Requests Confirmed in the Reporting Period

Report Structure

- Fully Mechanized, Partially Mechanized, Non-Mechanized
  - CLEC Specific
  - CLEC Aggregate
- Geographic Scope
  - State
  - Region
- Fully Mechanized
  0 - <= 15 minutes
  > 15 - <= 30 minutes
  > 30 - <= 45 minutes
  > 45 - <= 60 minutes
  > 60 - <= 90 minutes
  > 90 - <= 120 minutes
  > 120 - <= 180 minutes
  0 - <= 3 hours
  > 3 - <= 6 hours
  > 6 - <= 12 hours
  > 12 - <= 24 hours
  > 24 - <= 48 hours
  > 48 hours
- Partially Mechanized
  0 - <= 4 hours
  > 4 - <= 8 hours
  > 8 - <= 10 hours
  0 - <= 10 hours
  > 10 - <= 18 hours
  0 - <= 18 hours
  > 18 - <= 24 hours
  > 24 - <= 48 hours
  > 48 hours
- Non-mechanized
  0 - <= 4 hours
  > 4 - <= 8 hours
  > 8 - <= 12 hours
  > 12 - <= 16 hours

0 - <= 24 hours
> 16 - <= 20 hours
> 20 - <= 24 hours
> 24 - <= 36 hours
0 - <= 36 hours
> 36 - <= 48 hours
> 48 hours

- Trunks
  0 - <= 48 hours
  > 48 hours
- Average Interval is reported in business hours

Data Retained

Relating to CLEC Experience

- Report Month
- Interval for FOC
- Total Number of LSRs
- State and Region
- Total Number of ASRs (Trunks)

Relating to BellSouth Performance

- Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale – Residence	Fully Mechanized 95% <= 3 Hours
• Resale – Business	Partially Mechanized 95% <= 10 Hours
• Resale – Design (Special)	Non-Mechanized 95% <= 24 Hours
• Resale PBX	
• Resale Centrex	
• Resale ISDN	
• LNP (Standalone)	
• INP (Standalone)	
• 2W Analog Loop Design	
• 2W Analog Loop Non-Design	
• 2W Analog Loop with INP Design	
• 2W Analog Loop with INP Non-Design	
• 2W Analog Loop with LNP Design	
• 2W Analog Loop with LNP Non-Design	
• UNE Digital Loop < DS1	
• UNE Digital Loop >= DS1	
• UNE Loop + Port Combinations	
• UNE Combination Other	
• UNE ISDN Loop	
• UNE Other Design	
• UNE Other Non-Design	
• UNE Line Splitting	
• EELs	
• Switch Ports	
• UNE xDSL (ADSL, HDSL, UCL)	
• Line Sharing	
• Local Interoffice Transport	
• Local Interconnection Trunks	Trunks 95% <= 48 Hours

O-9: Firm Order Confirmation Timeliness

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Fully Mechanized	95% <= 3 Hours
• Partially Mechanized	95% <= 10 Hours
• Non-Mechanized	95% <= 24 Hours
• Local Interconnection Trunks	95% <= 48 Hours

O-11: Firm Order Confirmation and Reject Response Completeness

Definition

A response is expected from BellSouth for every Local Service Request transaction (version) Firm Order Confirmation and Reject Response Completeness is the corresponding number of Local Service Requests received to the combination of Firm Order Confirmation and Reject Responses

Exclusions

- Service Requests canceled by the CLEC prior to FOC or Rejected/Clarified
- Fatal Rejects
- LSRs identified as "Projects" with the exception of valid "Project IDs" for UNE-P to UNE Loop Bulk Migrations

Business Rules

Mechanized – The number of FOCs or Auto Clarifications sent to the CLEC from EDI, or TAG in response to electronically submitted LSRs

Partially Mechanized – The number of FOCs or Rejects sent to the CLEC from EDI, or TAG in response to electronically submitted LSRs which fall out for manual handling by the LCSC personnel

Non-Mechanized: The number of FOCs or Rejects sent to the CLECs by FAX server

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs) ASRs are submitted to and processed by the Local Interconnection Service Center (LISC) Trunk data is reported as a separate category

Bulk Migrations Requests for Bulk Migrations will come in to BellSouth via Global Requests The Global Request will be broken down into individual LSRs These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure

For CLEC Results

Percent responses is determined by computing the number of Firm Order Confirmations and Rejects transmitted by BellSouth and dividing by the number of Local Service Requests (all versions) received in the reporting period

Calculation

Firm Order Confirmation / Reject Response Completeness = (a / b) X 100

- a = Total Number of Service Requests for which a Firm Order Confirmation or Reject is Sent
- b = Total Number of Service Requests Received in the Report Period

Report Structure

Fully Mechanized, Partially Mechanized, Non-Mechanized and Interconnection Trunks

- State and Region
- CLEC Specific
- CLEC Aggregate

Data Retained

Relating to CLEC Experience

- Report Month
- Total Number of LSRs
- Total Number of rejects
- Total Number of ASRs (Trunks)
- Total Number of FOCs

Relating to BellSouth Performance

- Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	95% Returned
• Resale Business	
• Resale Design (Special)	
• Resale PBX	
• Resale Centrex	
• Resale ISDN	
• LNP (Standalone)	
• INP (Standalone)	
• 2W Analog Loop Design	
• 2W Analog Loop Non-Design	
• 2W Analog Loop with INP Design	
• 2W Analog Loop with INP Non-Design	
• 2W Analog Loop with LNP Design	
• 2W Analog Loop with LNP Non-Design	
• UNE Digital Loop < DS1	
• UNE Digital Loop >= DS1	
• UNE Loop + Port Combinations	
• UNE Combination Other	
• UNE ISDN Loop	
• UNE Other Design	
• UNE Other Non-Design	
• UNE Line Splitting	
• EELs	
• Switch Ports	
• UNE xDSL (ADSL, HDSL, UCL)	
• Line Sharing	
• Local Interoffice Transport	
• Local Interconnection Trunks	

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Fully Mechanized	95% Returned
• Partially Mechanized	
• Non-Mechanized	
• Local Interconnection Trunks	

P-7: Coordinated Customer Conversions Interval

Definition

This report measures the average time it takes BellSouth to disconnect an unbundled loop from the BellSouth switch, ~~and~~ cross connect it to CLEC equipment and notify the CLEC after the conversion is complete This measurement applies to service orders with INP and LNP, and where the CLEC has requested BellSouth to provide a coordinated cutover

Exclusions

- Any order canceled by the CLEC will be excluded from this measurement
- Delays due to CLEC following disconnection of the unbundled loop
- Unbundled Loops where there is no existing subscriber loop and loops where coordination is not requested
- Test Orders

Business Rules

Where the service order includes LNP, the interval includes the total time for the cutover including the translation time to place the line back in service on the ported line and the CLEC notification time after the conversion is completed When the service order includes INP, the interval includes the total time for the cutover including the translation time to place the link back in service on ported line and the CLEC notification time after the conversion is completed The interval is calculated for the entire cutover time for the service order including the CLEC notification time after the conversion is completed and then divided by items worked in that time to give the average per-item interval for each service order

Calculation

Coordinated Customer Conversions Interval = (a - b) / c

- a = Completion Date and Time ~~for Cross Connection of a Coordinated Unbundled Loop~~ of CLEC Notification
- b = ~~Disconnection~~ Start Date and Time of ~~an Coordinated Unbundled Loop~~ Conversion
- c = Number of items per order

Percent Coordinated Customer Conversions (for each interval) = ~~(e + d)~~ (d / e) X 100

- ~~e~~ d = Total number of Coordinated Customer Conversions for each interval
- ~~d~~ c = Total Number of Unbundled Loop with Coordinated Conversions (items) for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- The interval breakout is ~~0-5 = 0-4:99, 5-15 = 5-14:99, >= 15 = 15 and greater, plus Overall Average Interval~~
  <= 20 minutes
  > 20 minutes
- Geographic Scope
  - State
  - Region

Data Retained

Relating to CLEC Experience

- Report Month
- CLEC Order Number
- Committed Due Date (DD)
- Service Type (CLASS_SVC_DESC)

- Cutover Start Time
- Cutover Completion Time
- Portability Start and Completion Times (INP orders)
- Total Conversions (Items)

Note: Code in parentheses is the corresponding header found in the raw data file

Relating to BellSouth Performance

- No BellSouth Analog Exists

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Unbundled Loops with INP	95% <= ~~15~~ 20 minutes
• Unbundled Loops with LNP	95% <= ~~15~~ 20 minutes

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Unbundled Loops with INP	95% <= ~~15~~ 20 minutes
• Unbundled Loops with LNP	95% <= ~~15~~ 20 minutes

P-7E: Non- Coordinated Customer Conversions - % Completed and Notified on Due Date

Definition

This report measures the percentage of non-coordinated conversions that BellSouth completed and provided notification to the CLEC on the due date during the reporting period

Exclusions

- CLEC Canceled Service Orders
- Delays Caused by the CLEC
- Test Orders

Business Rules

This report measures whether BellSouth completes a non-coordinated conversion on the due date The order is considered successfully completed if the order is completed on the due date and the CLEC is notified on the due date

Calculation

Percent = (a / b) X 100

- a = Total number of non-coordinated conversions completed on the due date with CLEC notification
- b = Total number of non-coordinated conversions for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

Data Retained

Relating to CLEC Experience

- Report Month
- CLEC Order Number
- Committed Due Date (DD)
- CLEC Notification Date
- Total Conversions (Items)
- Completion Date

Note: Code in parentheses is the corresponding header found in the raw data file

Relating to BellSouth Performance

- No BellSouth Analog Exists

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Non-Coordinated Conversions	95% Completed on Due Date with CLEC Notification

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Non-Coordinated Conversions	95% Completed on Due Date with CLEC Notification

P-7E: Non- Coordinated Customer Conversions - % Completed and Notified on Due Date

Exhibit-AJV-3

SEEM Submetric List

Docket No. 03-00526

Date: 2/27/2004

Table B-1: Tier 1 Submetrics (Continued)

Item No.	Submetric
813	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Digital Loops ≥ DS1
814	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Switch ports
815	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Combo Other
816	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE xDSL (ADSL, HDSL, UCL)
817	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE ISDN (includes UDC)
818	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Line Sharing
819	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – Local Transport
820	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Line Splitting
821	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Other Design
822	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Other Non-Design
823	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – EELs
824	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch Dispatch in < 10 – UNE Loop and Port Combo
825	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch Switch Based < 10 – UNE Loop and Port Combo
826	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion – Local Interconnection Trunks
827	P-13B LNP – Percent Out of Service < 60 Minutes – LNP
828	P-13C LNP – Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date – LNP – (Standalone)
829	P-13D LNP – Average Disconnect Timeliness Interval & Disconnect Timeliness Distribution (Non-Trigger) • LNP (Normal Working Hours and Approved After Hours) • LNP (Unscheduled After Hours Ports)
830	TGP-2 Trunk Group Performance CLEC Specific
831	P-7E Non-Coordinated Customer Conversions - % Completed and Notified on Due Date

Table B-2: Tier 2 Submetrics (Continued)

Item No.	Submetric
872	PO-1 Loop Makeup – Average Response Time - Manual
873	PO-2 Loop Makeup – Average Response Time - Electronic
874	TGP-2 Trunk Group Performance CLEC Specific
875	P-7E Non-Coordinated Customer Conversions - % Completed and Notified on Due Date