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March 12, 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 four paper copies and a CD Rom of BellSouth's Rebuttal Testimony in the referenced docket. Testimony is being provided by

Ken Ainsworth	Ron Pate
Kathy Blake	Gary Tennyson
Al Heartley	Al Varner
Milton McElroy	

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 March 12, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

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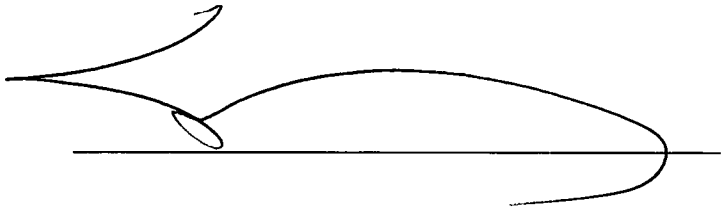


BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF KENNETH L. AINSWORTH

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO 03-00526

MARCH 12, 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. ARE YOU THE SAME KEN L AINSWORTH WHO EARLIER FILED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED TODAY?

A. I respond to portions of the direct testimonies of Mr. James D. Webber and Ms. Sherry Lichtenberg on behalf of MCI, and Mr. Mark David Van de Water on behalf of AT&T with regard to BellSouth's hot cut processes.

Q. ALL PARTIES HAVE DIRECTED THE AUTHORITY TO VARIOUS PORTIONS OF THE TRO AND THE RULES IN SUPPORT OF THEIR POSITIONS IN THEIR DIRECT TESTIMONY WHAT IS THE IMPACT OF THE D.C. CIRCUIT COURT OF APPEALS ORDER ON THE TRO IN THIS PROCEEDING?

A. Currently the impact of the DC Circuit Court's opinion is unclear. At the time of filing this testimony, the DC Court had vacated large portions of the rules promulgated as a result of the TRO, but stayed the effective date of the opinion for at least sixty days. Therefore my understanding is that the TRO remains intact for now, but its content, and the rules adopted thereto, must be suspect in light of the court's harsh condemnation of large portions of the order. Accordingly, I will reserve judgment, and the right to supplement my testimony as circumstances dictate, with regard to the ultimate impact of the DC Court's order on this case.

Q. BEFORE TURNING TO SPECIFICS, CAN YOU ADDRESS GENERALLY WHAT IS MISSING FROM THE COMPETITIVE LOCAL EXCHANGE CARRIERS' ("CLECS'") DIRECT TESTIMONY?

A Certainly. What is notably missing from the CLECs' testimony in this docket are alternative batch hot cut processes. The CLECs criticize BellSouth's process and speculate (without corroboration) about hypothetical things that could go wrong, but not one CLEC proposes any concrete alternative. AT&T purports to propose some "characteristics" of a process, but characteristics hardly constitute an operational process This Authority is charged with adopting and

implementing a batch hot cut process within 9 months of the effective date of this order. *See* ¶ 460 ("state commissions must, within nine months from the effective date of this Order, approve and implement a batch cut process ..."). BellSouth is the only participant in this proceeding that has complied with the purpose of this docket and the directives of the FCC and presented this Authority with a compliant batch hot cut process.

A. The Hot Cut Process

Q. WHILE YOU CAN ADDRESS EACH OF THE CLECS' TESTIMONIES SPECIFICALLY LATER IN YOUR REBUTTAL, PLEASE ADDRESS GENERALLY THE MAIN CLEC ALLEGATIONS REGARDING BELLSOUTH'S HOT CUT PROCESS.

A. Certainly. The CLECs generally complain about six (6) aspects of the process, each of which BellSouth has addressed:

(1) Go Ahead Notifications – BellSouth will provide the CLEC with notification via telephone (coordinated cuts) after each cut, or via email or fax (non-coordinated cuts) to allow the CLEC to port the number. For coordinated cuts, BellSouth's data shows that it provides the go-ahead notification, on average, in less than two (2) minutes For non-coordinated cuts, BellSouth will notify the CLEC of hot cut completions within 2 hours.

(2) Database impacts – BellSouth's hot cut process will not adversely impact database updates. With respect to E911, the end user's address will remain the same regardless of the end user's local service provider. Consequently, even if for some reason there was delay in updating the local service provider in the E911 database, it would not impact the ability of emergency personnel to find the end user.

(3) After hours cuts – BellSouth's batch process does allow for after hours and Saturday cuts. BellSouth will not dispatch personnel late in the evening for safety reasons – thus, after hours cuts that require dispatch may not be possible.

(4) Provision of all end user lines on same day – BellSouth's batch process will guarantee that an end user's account will all be cut on the same day

(5) Exclusion of certain loop types – BellSouth designed the batch hot cut process to convert UNE-P arrangements to UNE-L arrangements given the predominance of UNE-P and the Federal Communications Commission's ("FCC's") Order focused on UNE-P conversions. Specifically, ¶ 489 of the TRO provides that "state commissions should adopt a batch cut over 'increment' for migrating customers served by unbundled loops combined with unbundled local switching to unbundled stand-alone loops." This sentence means UNE-P to UNE-L.

(6) CLEC-to-CLEC migrations – BellSouth will perform hot cuts for CLEC-to-CLEC migrations in the batch process. The issues about which the CLECs

complain are issues regarding the CLECs' inability to exchange information amongst themselves. The reliability of the CLECs' information is not a flaw in BellSouth's process.

Go-Ahead Notifications

Q. PLEASE EXPLAIN BELLSOUTH'S "GO AHEAD" NOTIFICATION PROCESS TO CLECs.

A. BellSouth developed the process for "Go Ahead" notifications with the needs of the CLEC in mind When a CLEC wishes to have real time notification of hot cut completions, BellSouth offers coordinated hot cuts, which include a call to the CLEC upon completion of the hot cut. As I stated in my direct testimony, for the last year, BellSouth has made these notifications on average in less than two (2) minutes after the hot cut is complete.

For CLECs who do not wish to order coordinated hot cuts, BellSouth provides "Go Ahead" notifications either by e-mail or fax The CLEC determines the method of delivery. BellSouth delivers these notifications at an account level, which means that for each account being converted, a notification is sent. These notifications are driven by the closure of the work steps by the Central Office ("CO") and/or Field Technicians involved in the hot cut For batch orders, the technicians close out their work steps within two (2) hours of the actual hot cut. Once the work steps are completed, an automated program is activated to send either the fax or e-mail notification.

BellSouth is currently developing a web-based notification tool that will be used to provide CLECs with another alternative for receiving "Go-Ahead" notifications for non-coordinated conversions. This is currently scheduled to be available to the CLECs in June 2004. Exhibit KLA-8 outlines specific details and provides sample screen prints of the information to be contained in the web-based notification tool.

Database Updates

Q. ON PAGES 27-28 OF HER TESTIMONY, MS. LICHTENBERG SUGGESTS THAT IT REQUIRES MANUAL COORDINATION BETWEEN THE ILEC AND THE CLEC "TO CREATE AND ISSUE THE E911, AND LNP TRANSACTIONS" INVOLVED IN A HOT CUT DO YOU AGREE?

A. As far as E911 and LNP are concerned, there is no need for any manual coordination Routing to the number, if it is ported, is a direct result of the download of information from the Number Portability Administration Center ("NPAC"), which is a mechanized process that occurs everyday as numbers port. It is the responsibility of the port-to carrier to notify NPAC that the port has completed. Then, NPAC downloads the information and the routing is changed and no manual activity occurs.

Q. BEGINNING ON PAGE 38 OF HER TESTIMONY, MS LICHTENBERG ALLEGES THAT THE HOT CUT PROCESS WILL CAUSE ERRORS IN THE E911 DATABASE IS THIS TRUE?

A. No. Updates to the E911 database are triggered by a disconnect order. BellSouth has procedures in place that ensure timely issuance and completion of the disconnect order that unlocks the E911 database records BellSouth's disconnect service order to unlock the E911 database records has the same due date as the CLEC's request to port the number thereby minimizing errors in the E911 database. In the rare event that the completion of the service order is delayed, there will be no impairment to the end user's ability to effectively contact E911 in that the end user's address remains the same – it is only the identity of the service provider that changes. Thus, emergency personnel can obtain the address, regardless of the change in local service providers.

Q. BEGINNING ON PAGE 46 OF HER TESTIMONY, MS. LICHTENBERG COMPLAINS ABOUT BELLSOUTH'S POLICY OF ONLY ALLOWING "AS IS" DIRECTORY LISTING CHANGES FOR THE FIRST MIGRATION IN A BATCH HOT CUT. ARE HER COMPLAINTS VALID?

A. No. BellSouth does allow migration of directory listings "as is" on subsequent requests, when appropriate. All characteristics of the directory listing to be migrated "as is" must remain unchanged. For example, record type ("RTY"), listing type ("LTY"), alpha listing identifier code ("ALI"), listing telephone number, etc Any change in the way the listing is set up on the existing customer service record does not qualify for an "as is" migration

After-Hours Cuts

Q. MR. VAN DE WATER ALLEGES, ON PAGE 13 OF HIS TESTIMONY, THAT BELLSOUTH'S BATCH HOT CUT PROCESS IS FLAWED BECAUSE IT DOES "NOT ALLOW FOR AFTER-BUSINESS-HOURS HOT CUTS." IS THIS CORRECT?

A. No. BellSouth will include after hours and Saturday cuts in the batch process.

End-user lines

Q. MR VAN DE WATER ALLEGES, ON PAGE 13 OF HIS TESTIMONY, THAT BELLSOUTH'S BATCH HOT CUT PROCESS IS FLAWED BECAUSE IT DOES NOT ENSURE THAT ALL END USERS' LINES WOULD BE PROVISIONED ON THE SAME DAY PLEASE COMMENT.

A. All lines for an individual end user on a single Customer Service Record ("CSR") will be provisioned on the same day If an end user has multiple accounts, BellSouth will guarantee that all the lines in an end user's accounts will be cut on the same day. This should alleviate Mr. Van de Water's concern.

Q. ON PAGE 20 OF HIS TESTIMONY, MR. VAN DE WATER INFERS THAT BELLSOUTH CURRENTLY DOES NOT HAVE A BATCH HOT CUT PROCESS THAT MEETS CERTAIN STATE REQUIREMENTS, BASED ON BELLSOUTH'S FILINGS IN OTHER STATES. IN THOSE FILINGS, AT&T CRITICIZED

BELLSOUTH'S ALLEGED "FAILURE" TO IDENTIFY THE QUANTITY OF LOOPS THAT CAN BE PROVISIONED TOGETHER IN THE BATCH PROCESS. PLEASE ADDRESS THIS CONCERN.

A. First of all, it is important to note that to the extent BellSouth has "failed", AT&T has also failed in that it does not specify what it believes to be the appropriate volume. Moreover, it is not that BellSouth has failed by providing a limit; rather, BellSouth has no predetermined limit on the number of loops that can be provisioned together in its batch hot cut process. Many variables would have to be assumed in order to set such a limitation including whether multiple CLECs submit batch orders at the same time for the same central office and the size of the central office involved The use of the Customer Care Project Manager ("CCPM") and the Network Single Point Of Contact ("SPOC") allows the flexibility necessary to set due dates based on these and other variables. BellSouth, in the past, has told one (1) CLEC that a good rule of thumb to use would be 125 lines per central office per day. However, this is not a hard and fast rule for the reasons stated above. BellSouth has already proven that it can perform hot cuts at a much higher rate than this in some central offices as I stated in my direct testimony

That being said, BellSouth is currently developing a web-based scheduling tool for batch ordering that will allow the CLECs to reserve the due dates for their orders before they are submitted so they will know how many lines can be cut on a particular day. BellSouth is targeting the release of this functionality for October 2004. When the scheduler is implemented, a batch hot cut limit will, by

necessity, be imposed. BellSouth is considering a limit of 200 batch hot cuts per central office per day. Exhibit KLA-9 outlines specific details of this web-based scheduling tool.

Q. DO REQUESTS FOR LOOPS COMPRISED OF HIGHER LINE COUNTS REQUIRE "SIGNIFICANT NEGOTIATION" AND DEPARTURE FROM EXISTING PROVISIONING AND PERFORMANCE INTERVALS AS ALLEGED BY MR WEBBER ON PAGE 16 OF HIS TESTIMONY?

A No. BellSouth's individual and project hot cut processes do not require any negotiation and/or departure from existing provisioning and performance intervals unless there are 15 or more lines on the same end user account. Due to the nature of the batch hot cut process, there is negotiation that takes place within BellSouth to establish due dates for the hot cuts. BellSouth has proposed, however, performance measurements that will monitor the period of time between receipt and return of the initial spreadsheet from the CLEC. These procedures are discussed in my direct testimony.

Further, BellSouth is currently developing a web-based scheduler that will provide the CLECs the ability to schedule due dates prior to submitting their batch request. This will remove the need for any negotiation from the batch process

Exclusion of Loop Types

Q. MR WEBBER, ON PAGES 22-23 OF HIS TESTIMONY, COMPLAINS BECAUSE CERTAIN (UNSPECIFIED) LOOP TYPES ARE "EXCLUDED" FROM THE HOT CUT PROCESS. PLEASE COMMENT.

A. BellSouth's batch hot cut process includes conversions to both voice and data loops. Both designed and non-designed voice loops are included as well as both designed and non-designed xDSL type loops. The xDSL loops include Asymmetrical Digital Subscriber Line ("ADSL"), High-bit-rate Digital Subscriber Line ("HDSL"), and unbundled copper loops. All non-complex UNE-P services are available for conversions to these loops through the batch hot cut process. This includes the vast majority of the existing UNE-P accounts that are in place today. BellSouth's records indicate that for the 12-month period December 2002 through November 2003, 99.93% of the UNE-P lines that have been installed are eligible for conversions to UNE-Loops through BellSouth's batch hot cut process. The small percentage, 0.07%, of services or loop types that are not included in the batch hot cut process can be converted through BellSouth's individual or project hot cut processes.

Q. WHY DOES BELLSOUTH LIMIT THE BATCH HOT CUT PROCESS TO UNE-P TO UNE-L CONVERSIONS?

A. First, and most importantly, because that is what the TRO requires. In ¶ 489, the FCC directs "state commissions [to] adopt a batch cut over 'increment' for

migrating customers served by unbundled loops combined with unbundled local circuit switching to unbundled stand-alone loops." Unbundled loops combined with unbundled local switching means UNE-P

Second, BellSouth developed its batch hot cut (bulk migration) process with input from the CLEC community through the Change Control Process ("CCP") process. To my knowledge, the CLECs did not request that any other loop types be included in the process.

Q. IS LIMITING THE BATCH PROCESS TO CONVERSIONS FROM UNE-P TO UNE-L "MITIGATING THE POTENTIAL BENEFITS OF IMPROVED HOT CUT PROCESSES" AS MR. WEBBER ALLEGES ON PAGE 23 OF HIS TESTIMONY?

A. No. As I stated above, the service or loop types that are not included in the batch hot cut process constitute a very small percentage of the existing UNE-P accounts. Moreover, even if such limits exist, they are limits imposed by the FCC because the FCC directed this Authority to adopt a batch process "for migrating customers served by unbundled loops combined with unbundled local circuit switching to unbundled stand-alone loops " *See* ¶ 489.

Q ON PAGE 16 OF HIS TESTIMONY, MR WEBBER COMPLAINS BECAUSE BELLSOUTH'S HOT CUT PROCESS IS NOT AVAILABLE FOR ENHANCED EXTENDED LINKS ("EELS") PLEASE COMMENT.

A. In response to this criticism, BellSouth has agreed to include hot cuts to DS0 EELs in its batch and individual hot cut processes. BellSouth's target implementation date is July 2004. Exhibit KLA-10 is a draft of the Market Service Description for this process. As discussed above, however, such migrations are not required in the batch process as defined by the FCC. *See* ¶ 489 (state commissions must adopt and implement a batch process for migrating UNE-P to "unbundled stand-alone loops.")

CLEC-to-CLEC Migrations

Q. MR. WEBBER ARGUES, ON PAGE 16 OF HIS TESTIMONY, THAT BELLSOUTH'S HOT CUT PROCESS IS NOT "AVAILABLE" BECAUSE IT DOES NOT INCLUDE CLEC-TO-CLEC MIGRATIONS. PLEASE COMMENT.

A. Mr. Webber is incorrect BellSouth will perform CLEC-to-CLEC conversions. BellSouth's CLEC-to-CLEC conversion product is described in the ***CLEC to CLEC Conversion for Unbundled Loops*** document located on the CLEC Guides web site at: http://www interconnection bellsouth com/guides/html/usoc.html. CLEC-to-CLEC loop conversions may be ordered individually or as a project Further, in response to CLEC concerns, BellSouth has agreed to CLEC-to-CLEC migrations (UNE-P to UNE-L) to the Batch Hot Cut Process, as well as CLEC-to-CLEC migrations (UNE-L to UNE-L) as soon as necessary systems changes can be made.

Q. WITNESS LICHTENBERG ALLEGES, ON PAGE 31 OF HER TESTIMONY, THAT THE EXCHANGE OF INFORMATION FOR CLEC-TO-CLEC MIGRATIONS HAS NOT BEEN ESTABLISHED. PLEASE COMMENT.

A. As I have testified, BellSouth will perform CLEC-to-CLEC migrations. The issues, about which the CLECs complain, however, are not BellSouth's problems. Rather, CLECs complain about the inability to obtain cooperation or accurate information from one another. Problems presented are related to obtaining accurate end-user information from other CLECs' CSRs; difficulty obtaining CSRs from CLECs; and difficulties in obtaining circuit ID information from other CLECs as preparation to migrating an end-user between CLECs. The CLECs need to fix those problems, not BellSouth. That being said, BellSouth is currently participating with other ILECs and CLECs in a Florida End User Migration collaborative to identify and propose resolutions for CLEC-to-CLEC end-user migration issues.

Q. IS IT PRACTICAL TO ALLOW A "MIGRATE AS IS" FUNCTIONALITY FOR DIRECTORY LISTINGS FOR CLEC-TO-CLEC MIGRATIONS AS MS. LICHTENBERG ADVOCATES ON PAGE 47 OF HER TESTIMONY?

A. No, it is not practical to allow a "migrate as is" functionality for directory listings for CLEC-to-CLEC migrations In case of standalone directory listings, migrating from one CLEC to another, BellSouth has a manual process, which allows the submission of one Local Service Request ("LSR"); however, the CLEC does have to provide complete directory listing information. In support of this manual

process, Change Control 1108 was submitted, accepted, and prioritized by the CLEC community to mechanize BellSouth's manual process. To my knowledge, no request was received from any CLEC to include "migrate as is" functionality in this process.

Other Issues

Q. MR. VAN DE WATER CONTENDS, ON PAGE 13 OF HIS TESTIMONY, THAT BELLSOUTH LACKS A PROCESS FOR TIMELY RESTORAL OF CUSTOMER SERVICE IN THE EVENT OF A PROBLEM WITH THE HOT CUT DO YOU AGREE?

A. No. In the rare event that there is a problem encountered during a hot cut, BellSouth will work to resolve the problem if it is in the BellSouth portion of the network. If the problem is in the CLEC portion of the network, the CLEC has an opportunity to either correct its problem or request that BellSouth delay the hot cut as long as the CLEC has not performed number porting activity and the BellSouth service orders have not been completed. If the conversion orders have already been completed, the CLEC may input a trouble ticket on the unbundled loop. If the trouble is reported within 24 hours of the completed date, an expedite procedure is in place to throwback to the original UNEP service at the CLECs request. BellSouth has updated its UNE-P to UNE-L Bulk Migration Process to document the restoral process for both coordinated and non-coordinated orders. This should address Mr. Van de Water's concern.

Q. ARE BELLSOUTH'S BATCH CUT INTERVALS REFLECTIVE OF BELLSOUTH'S CAPABILITY OF CUTTING OVER COMMERCIAL VOLUMES OF CUSTOMERS?

A. Absolutely The intervals in the batch hot cut process are designed to allow the project manager the opportunity to schedule the cuts so that they will occur in the most efficient manner possible. It is important to remember that the batch process applies to conversion of an embedded base – it is not applicable to daily load. (*See* ¶ 489). Thus, there is ample time to schedule the cuts assuming proper planning and scheduling by the CLEC

Moreover, as BellSouth witness Milton McElroy discusses in his rebuttal testimony, BellSouth's third party test of its batch hot cut process shows its capability to move large quantities of customers from BellSouth's switches to a CLEC's switches in a single day.

Finally, over the last four months, BellSouth has successfully migrated over 15,000 UNE-P arrangements to UNE-L for a single CLEC in Florida. While the CLEC did not choose to use the batch process, the fact that BellSouth could migrate that many loops using its less efficient individual process demonstrates the high degree of accuracy and skill in BellSouth's processes and network operations staff.

Q. WHAT IS THE HIGHEST SINGLE DAY / SINGLE OFFICE VOLUME OF HOT CUTS THAT BELLSOUTH HAS PERFORMED FOR ONE CLEC?

A. On February 26, 2004, BellSouth performed over 320 hot cuts in one (1) central office.

B. <u>BellSouth's Hot Cut Performance</u>

Q. PLEASE COMMENT GENERALLY ON THE CLECS' ALLEGATIONS REGARDING BELLSOUTH'S PERFORMANCE OF ITS HOT CUT PROCESS.

A. Certainly. What is most noteworthy about the CLECs' comments as a whole is their lack of credible evidence to support their allegations. The Authority should not make the same mistake made by the FCC in the Triennial Review proceeding and rely on uncorroborated anecdotal evidence Rather, t the Authority should look at the facts, all of which support BellSouth's high level of performance

Q. DO CUSTOMERS EXPERIENCE LESS THAN THREE (3) MINUTES OF SERVICE DISRUPTION DURING CONVERSION?

A. Yes. BellSouth's performance measures for coordinated hot cuts performed for CLECs from November 2002 through October 2003 reveals that the average interval when the loop was detached from BellSouth's switch, but not yet attached to a CLEC's switch, was 2:54 minutes, which falls within three (3) minutes. While BellSouth might, through the hot cut process, cause service disruption, the CLEC has significant responsibility to ensure minimal service disruption. For example, the CLEC must provision its own switch port and

assure dial tone is present and that all required switch-based features are translated in its switch at the time of cutover. Once the cutover of the loop from BellSouth's switch to the CLEC's switch is effectuated, the CLEC must launch messages to begin the porting of calls bound for that telephone number to the CLEC's switch. Obviously, BellSouth is not and cannot be responsible for a CLEC's actions or inactions regarding the hot cut process.

Q CAN BELLSOUTH HOT CUT CLECs' CUSTOMERS TO THE CLECs' SWITCHES IN A TIMELY MANNER?

A. Yes. As I showed in my direct testimony in this proceeding (as did BellSouth's witness Al Heartley), BellSouth can scale its operations and personnel to accommodate even a "worst case" scenario To calculate load, I used the highest level of inward UNE-P movement that BellSouth has encountered at any time in the last 33 months (at the time I filed my direct testimony in this proceeding) and assumed that that level of inward movement would be repeated every single month going forward. The bottom line is that, even assuming that volume as well as making other upward adjustments to the load volume, BellSouth can accommodate those projected volumes.

Q. MS. LICHTENBERG ALLEGES, ON PAGE 18 OF HER TESTIMONY, THAT "FOR EXAMPLE, IN TENNESSEE A BELLSOUTH UNE-P MIGRATION TAKES ABOUT ONE BUSINESS DAY, WHILE MIGRATING THE SAME CUSTOMER TO UNE-L TAKES SUBSTANTIALLY LONGER, ASSUMING BELLSOUTH HAS THE RESOURCES NECESSARY TO PERFORM THE CUTOVER ON THE

REQUESTED DATE." [EMPHASIS ADDED] PLEASE COMMENT

A. BellSouth's intervals for individual hot cuts range from 3-4 days depending on whether or not the loops are designed or non-designed and if non-designed, whether they are coordinated or non-coordinated.

Q. MS. LICHTENBERG ALLEGES, ON PAGE 25 OF HER TESTIMONY, THAT BECAUSE BELLSOUTH'S HOT CUT PROCESS IS MANUAL, IT "OFTEN RESULT[S] IN ERRORS AND DELAYS." DOES THE DATA CONFIRM HER POSITION?

A. Absolutely not. Ms. Lichtenberg makes several unfounded allegations without any data to support her erroneous claims As the FCC and nine state commissions have found, the mere absence of a mechanized process does not indicate that an ILEC is non-compliant or that CLECs are impaired. Please see the testimony of Alphonso Varner for details relating to BellSouth's hot cut performance.

C. <u>Scalability</u>

Q. WHAT WOULD HAPPEN TO THE EMBEDDED BASE OF UNE-P CUSTOMERS WERE THIS AUTHORITY TO REACH A FINDING THAT CLECS ARE NOT IMPAIRED WITHOUT UNBUNDLED LOCAL SWITCHING?

A. As I pointed out in my direct testimony, if this Authority were to reach a finding

that CLECs are not impaired without unbundled local switching, the conversion of the CLECs' embedded base of customers served by UNE-P would not commence until August 2005 (seventeen months from the time this testimony is filed) and then would be migrated to the CLECs' own switches over a 21 month transition period as set out by the FCC in its Triennial Review Order. Thus, BellSouth has almost a year and a half to get ready for something that will occur over an almost two-year period. I showed calculations in my direct testimony (as did BellSouth witness Al Heartley) deriving the personnel BellSouth would have to hire and train even in a "worst case" scenario. I also testified regarding the steps BellSouth would take to accommodate such a scenario. I would note, however, that my "worst case" scenario was predicated on a finding that all the Commissions in BellSouth's nine-state region would find that CLECs were impaired in no markets in BellSouth's region and that BellSouth and no CLECs reached agreement whereby the CLEC's customers would remain on BellSouth's switches at market rates My calculations considered even such an unlikely outcome and concluded that BellSouth could accommodate the volumes of hot cuts resultant from such an outcome.

D. IDLC

Q. ON PAGE 16 OF HIS TESTIMONY, MR. WEBBER ARGUES THAT IDLC LINES ARE NOT AVAILABLE TO BE CUT VIA THE HOT CUT PROCESS. IS HE CORRECT?

A. No IDLC lines are available to be cut via BellSouth's batch hot cut process.

IDLC lines require that the line be cut to a new facility, and thus require a field dispatch. This does not mean, however, that the line is not available to be cut via the hot cut process. I described the IDLC conversion options at length in my direct testimony.

Q. IN THE HOT CUT PROCESS, IS IT POSSIBLE THAT CERTAIN REQUESTED HOT CUTS IN A PARTICULAR BELLSOUTH CENTRAL OFFICE MAY POSSIBLY BE FULFILLED USING SL2 LOOPS?

A First, let me explain that IDLC equipment allows connecting loops directly to switching equipment without intervening equipment referred to as Central Office Terminals or "COTs" In older forms of Digital Loop Carrier ("DLC") equipment, the individual loops are multiplexed onto high-speed transmission facilities at the DLC Remote Terminal ("RT") for transport to the serving central office. At the central office, the high-speed transmission facilities are de-multiplexed back to discrete pairs (one for each customer loop). With IDLC, there is a device referred to as the COT but it does not perform the de-multiplexing back to discrete loops. Rather it is used for administrative purposes. This means that the high-speed transmission facilities (usually operating at DS-1) containing the multiplexed loops are connected directly to the switching equipment and other means for providing unbundled loops must be utilized. Some of those methods (for example, the use of so-called "side door" or "hair pin') must be designed so as to make sure all required assignments are performed. It is this circuit designing that requires that certain unbundled loops be provisioned as SL2 loops. This Commission has previously addressed and set the rates that

BellSouth may charge CLECs for SL2 loops.

Q. REGARDING BELLSOUTH'S HOT CUT PROCESS, ARE THERE ANY TECHNICAL OR OPERATIONAL CONSTRAINTS SUCH AS MASS DEPLOYMENT OF IDLC AND FIBER THAT WOULD PREVENT CLECS FROM SERVING CUSTOMERS OVER THEIR OWN FACILITIES?

A. No, for the reasons set forth in Mr. Tennyson's rebuttal testimony in Docket No. 03-00491.

Q. MR. WEBBER FURTHER ALLEGES, ON PAGE 8 OF HIS TESTIMONY, THAT THE PROCESS OF "UNBUNDLING END USER LOOPS THAT ARE PROVIDED OVER INTEGRATED DIGITAL LOOP CARRIER ('IDLC') TECHNOLOGY INVOLVES WORKAROUNDS THAT ARE TYPICALLY TIME CONSUMING, EXPENSIVE AND FRAUGHT WITH TECHNOLOGICAL DEFICIENCIES THAT, AMONG OTHER THINGS, IMPLICATE THE HOT CUT PROCESS." PLEASE COMMENT.

A. Mr. Webber's allegations are without merit and he provides no evidence to support them. The process that Mr. Webber speaks of is simple and is something that ILECs perform on a daily basis. The process of which he speaks simply is moving a given end user from one facility to another (i.e. moving from IDLC to copper). BellSouth performs these tasks on a routine basis and does so without incident. As I stated earlier and in my direct testimony, BellSouth's performance measures for coordinated hot cuts demonstrate that the average

out of service time for hot cuts is 2 54 minutes. This includes hot cuts where facility changes are involved.

E. Automation of the Hot Cut Process

Q. AT&T ARGUES (VAN DE WATER TESTIMONY AT PAGE 11) THAT THE MANUAL HOT CUT PROCESS "IS INHERENTLY INCAPABLE OF SUSTAINING VOLUMES" NECESSARY TO SUPPORT UNE-L. DOES THIS PREMISE ACCORD WITH THE *TRIENNIAL REVIEW ORDER*?

A. No, it does not. AT&T argued that the FCC should require Electronic Loop Provisioning and the FCC rejected that argument. Despite its unsubstantiated finding that the hot cut process causes impairment, the FCC directed the states to implement a process that would alleviate impairment, presuming that such a manual process was achievable. This holding, in conjunction with the FCC's explicit rejection of AT&T's ELP process, undermines Van de Water's argument that a manual process is "inherently incapable of sustaining volumes." BellSouth witness Gary Tennyson addresses the infeasibility of the CLECs' electronic processes in more detail

F. Miscellaneous Issues

Q. MCI ADVOCATES THE ESTABLISHMENT OF "AUTHORITY-SPONSORED WORKSHOPS" TO ADDRESS ALLEGED ISSUES WITH BELLSOUTH'S HOT CUT PROCESS (LICHTENBERG TESTIMONY AT PAGE 29). IS THIS

NECESSARY?

A. While under ordinary circumstances BellSouth fully supports collaborative improvements to its processes (See Line Sharing Collaborative), BellSouth cannot support the CLECs' requests for collaboration in this instance First, the CLECs' requests for collaboration only have occurred after the commencement of the state impairment cases. Further, and most importantly, the CLECs have admitted that no matter how many improvements BellSouth makes to its manual process, the CLECs will continue to argue they are impaired without an eight (8) billion dollar retrofit of BellSouth's network to allow for automated hot cuts. Finally, the CLECs' arguments are disingenuous in that despite the fact that the Florida collaborative on CLEC-to-CLEC migrations and BellSouth's Line Sharing Collaborative addressing migrations with line splitting are on-going; the CLECs have chosen to raise the issues in those collaboratives in this hearing. These facts seem to evidence that the CLECs themselves will not rely on collaboratives. Given the CLECs' positions, it does not make sense for BellSouth to devote time and resources to a doomed process.

However, BellSouth has always stated that it was willing to consider specific process changes proposed by the CLECs While the CLECs have chosen to make these suggestions via this docket, as opposed to through operational channels, BellSouth has listened. In an effort to be responsive, BellSouth has agreed to make the following enhancements (which address virtually all of the CLECs' concerns) to its effective and seamless batch hot cut process:

- Batch process will be applicable to CLEC-to-CLEC migrations (UNE-P to

UNE-L);

- Batch process will be applicable to CLEC-to-CLEC migrations (UNE-L to UNE-L) at such time as necessary systems changes can be made;
- Batch process will guarantee that an end user's account will all be cut on the same day;
- Batch process will include after-hours and Saturday cuts;
- Batch process will guarantee a four-hour time window for coordinated hot cuts;
- Batch process will include a timely restoral process if there is a problem with the cut;
- BellSouth will implement a web-based communication system for non-coordinated hot cuts similar to that implemented by Verizon and SBC;
- BellSouth will reduce the 14-day provisioning interval in the batch process to 8 days;
- BellSouth will implement a scheduling tool similar to SBC's;
- Batch process will include hot cuts to DS0 EELs.

These enhancements to BellSouth's already-compliant Batch Hot Cut Process should address virtually all of the CLEC's alleged criticisms of the process. I have attached as Exhibit KLA-11the UNE-P to UNE-L Bulk Migration CLEC Information Package, which was updated and posted to the web on February 18, 2004. It contains many of the enhancements that I have just mentioned.

G. UNE-L Performance

Q. IS MS. LICHTENBERG'S CHARACTERIZATION, ON PAGES 36-37 OF HER TESTIMONY, OF INCREASED OUT OF SERVICE TIMES AND CUSTOMER HARM FOR TROUBLES IN A UNE-L ENVIRONMENT ACCURATE?

A. No, quite the contrary. BellSouth's performance data demonstrates that the Maintenance Average Duration time for 2 Wire Analog Loops is less that it is for UNE-P. For the period November 2002 through October 2003, the average duration time for trouble reports for 2 Wire Analog Loops Non-Designed was 14.01 hours, while the average duration time for trouble reports for 2 Wire Analog Loops Designed was 5.52 hours. For this same period, the average duration time for trouble reports for UNE-P was 18 64 hours. (Please see Exhibit KLA-12) This data demonstrates that CLECs are not impaired due to increase out of service times and customer harm in the UNE-L environment as Ms. Lichtenberg states. Mr. Varner discusses BellSouth's performance in more detail.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

BELLSOUTH

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**

BELLSOUTH

(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

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***

TRA Docket No 03-00526 Exhibit
KLA-9

BellSouth Telecommunications, Inc
TRA Docket No. 03-00526
Exhibit No KLA-10

Unbundled Dedicated Transport – Bulk Migration to EELs Marketing Service Description

Version 1

Draft

Document Prepared by:

Michael Hurst, Product Manager 205-977-1223

Table of Contents

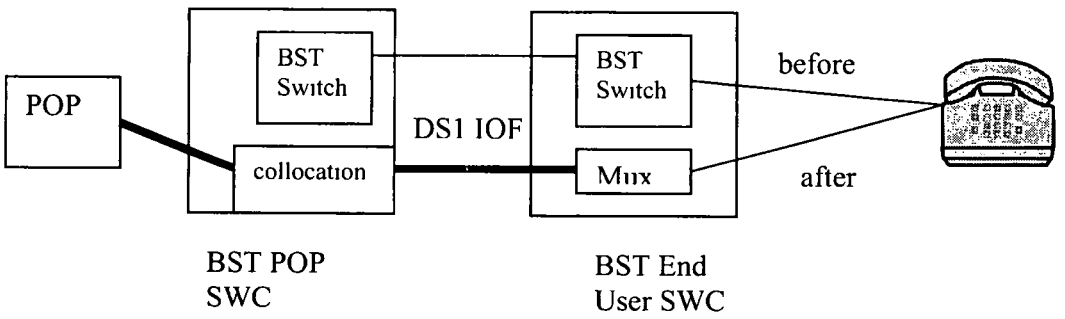
Revision	Date	Reason
1		Initial version

I. MARKETING SERVICE DESCRIPTION

There is a need to offer Competitive Local Exchange Companies (CLECs) the ability to utilize a bulk migration methodology to migrate from retail, resale, and Unbundled Network Element Platform (UNE-P) to Unbundled Dedicated Transport – Enhanced Extended Links (EELs). This process will require changes to the utilization of the existing Bulk Migration process. Unless otherwise described below, all the features of the UNE-P to UNE-L Bulk Migration process will be used for this process as well. This includes but is not limited to time windows for conversions, restoral process, after hours cuts, same day migrations, etc.

A. Basic Service Features:

a. BellSouth will accept a completed Bulk Migration Project Notification, herein known as Project Notification. The Project Notification will identify the local loop circuits that are to be migrated to EELs.
b BellSouth will check the Project Notification and, if correct, will begin negotiation of due dates. If incorrect, BellSouth will return the Project Notification to the CLEC with documentation describing the error conditions.
c. BellSouth will notify the CLEC of the due dates.
d. Subsequent to the due date notification, BellSouth will accept a Bulk Request package from the CLEC and separate the PONs into separate LSRs, while populating the LSR fields and generating LSRs.
e. BellSouth will project manage the migration to EELs using an existing unbundled dedicated channelized DS1 interoffice channel terminating to a collocation arrangement, which is a migration prerequisite. This will include order issuance and coordination. BellSouth's internal network forces will perform all provisioning and testing functionality All internal databases will be changed to reflect this migration.
f. BellSouth will bill the CLEC the non-recurring and recurring rate for the unbundled EEL upon provisioning.



B. Basic Service Capabilities:

CLEC will be able to request to have its end user's non-complex residence and business lines (shown below) migrated to an EEL.

USOC	Description
1FB	Business, 2-wire Voice Grade Business Line
1FR	Residence, 2-wire Voice Grade Residence Line

Table 1

The Project Notification Process:

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

Requirements:

- For complete ordering requirements, refer to the UNE to UNE Bulk Migration of the Local Ordering Handbook.
- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services (retail, resale, UNE-P) to Unbundled Loops with Local Number Portability (LNP) to an EEL.
- A UNE Loop will be provided for each ported telephone number formerly associated with the existing service
- The existing services that can be migrated are listed in Table 1.
- The resulting EEL codes are listed in Tables 3, 4 and 5. They must be in the CLEC's Interconnection Agreement.

Bulk Migration to EELs

- Bulk Requests that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status, must be cancelled by the CLEC and removed from the Bulk Request
- All Existing Account Telephone Numbers (EATNs) on the Bulk Request must use the existing Regional Street Address Guide (RSAG) valid end-user address.
- All EATNs must be served from the same BellSouth Serving Wire Center (SWC).
- All existing services on a Bulk Request must be migrated to a single UNE local loop type.
- No end-user moves or changes of address will be allowed on the Bulk Request.
- Non-Recurring rates for the specific loop type being requested will be charged.
- Service order charges for mechanized orders (SOMEC) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request.
- A BellSouth Project Manager (PM) will project manage the Bulk Request.
- CLEC must submit a BellSouth Bulk Migration Project Notification, herein known as Project Notification, to the BellSouth PM prior to the CLEC's placing the mechanized Bulk Request.
- CLEC may specify Desired Due Dates (DDD) for each EATN However, the BellSouth PM will negotiate firm Due Dates for the Bulk Request.
- A minimum of two (2) EATNs and up to a maximum of ninety-nine (99) EATNs can be placed on a single Bulk Request
- A maximum of twenty-five (25) end-user telephone numbers per EATN can be placed on a Bulk Request.
- No additional EATNs or end-user telephone numbers may be added to the BellSouth Bulk Migration Project Notification form once it has been submitted to the BellSouth PM.
- 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 to be migrated.

BellSouth Bulk Migration Project Notification Interval

- The "*PM Targeted Response Interval*" column in the table below represents the targeted number of business days in which the PM will respond back to the CLEC
- CLEC must submit the Project Notification in advance of the earliest CLEC's requested Desired Due Date (DDD) according to the "*Minimum No. of Days in Advance to Submit Project Notification*" column in the Table 2. This column represents the number of days that the Project Notification must be submitted in advance of the earliest DDD.

Bulk Migration to EELs

- *"Minimum No. of Days"* includes the interval for the Project Manager to negotiate the Due Dates It also allows three (3) days for the CLEC to correct, process and submit mechanized Bulk Request and it includes 14 days in order to meet the 14-business day submission requirement for the Bulk Request.
- The PM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

No of end-user Telephone Numbers	PM Targeted Response Interval	CLEC Days After Receipt from Project Mgr	Bulk Request Submission Requirement	Minimum No of Days in Advance to Submit Project Notification
2 - 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+	TBD	3 business days	14 business days	Contract CCPM

Table 2

The charts below represent the resulting EEL after the migration All resulting EELs will have Local Number Portability (LPN)

Basic Class of Service	Loop USOC	Description
UNCVX	UEAL2, UEAR2	2-wire Unbundled Voice Loop – SL2

Local Loop, Table 3

Basic Class of Service	USOC	Description
UNC1X	1D1VG	Voice Grade COCI

Central Office Channel Interfaces, Table 4

Basic Class of Service	USOC	Description
UNC1X	MQ1	DS1 Channelization System
UNC1X	U1TF	DS1 Interoffice Channel

Interoffice Channel, Table 5

B. Forecast:

	UNITS			
SERVICE	2004	2005	2006	2007
UNE-P to EEL	TBD	TBD	TBD	TBD

D. Billing:

Billing will be accomplished through CABS.

Bulk Migration to EELs
1. SIG will not apply.
2. SAW will not apply
3 Billing Guarantee will not apply.
4. State Missed Appointment Credits will apply.
5. Expedite Charges for shorter intervals will apply.
6. Cancellation Charges will apply
7. Service Order Modification charges will apply.

Pricing Structure.

Existing Service Rearrangement – Change in CFA, Project Management Charges and Service Order charges will apply

Credit Terms/Payment Plans - There are also no volume or term options for this service.

E. Deployment Schedule:

Ubiquitous deployment assumed. Additional transport capacities may be developed based on the Bona Fide Request process.

F. Distribution Channels:

Use Interconnection Services Sales Channels - current headcount shared among all UNEs. The CLEC CARE SME will compile an Account Team Information Package from the Marketing Service Description as well as work identified by the Project Team during implementation.

G. Product Codes, etc.:

- Unique sales codes for LCSC
- Establish new product codes for services. Product Management will request new product codes from ICS Finance.
- Unique identifiers will be assigned to all recurring rate elements

H. Product Tracking Needs:

Unit Counter – TBD. Need unique counters for the non-recurring rate element.
Revenue and Expenses - ABIS
Accounted for by: Region/State/GEO/Wire Center/Customer (by ACNA)

Bulk Migration to EELs

I. Tariff/Contract/Agreement:

Standard Contract Agreement

- Product Management will develop appropriate contract language and includes the rate structure within the next standard contract agreement.
- Current headcount for contract administration spread over UNEs.

J. Advertising and Promotion:

There will be no advertising or promotion of this service other than the inclusion of necessary information on the Interconnection WEB site.

K. Customer Training:

- Product Management will include appropriate information regarding these services on the Interconnection WEB site.

L. Staff Support Requirements:

The following requirements are for all Transport Product and Project Management UNEs

Table 1 Headcount Requirements for Transport UNEs

	PG	2004
Product Manager	59 58	1 1
Project Mgrs.	59	2
Project Team	59 58	6 6

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

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.

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)

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

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

UNE-P to UNE-L Bulk Migration

10 Intervals

10.1 Bulk Migration Project Notification Interval

- The "CC*PM 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

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
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Exhibit KLA-12

State	Maintenance and Repair Products	Nov-02	Dec-02	Jan-03	Feb-03	Mar-03	Apr-03	May-03	Jun-03	Jul-03	Aug-03	Sep-03	Oct-03	Average
FL	2W Analog Loop Non-Design	13 49	13 64	11 43	10 85	12 51	12 80	13 06	15 92	14 74	14 91	15 46	15 67	13 71
GA	2W Analog Loop Non-Design	11 49	10 72	9 79	8 50	9 56	8 20	9 73	11 42	10 14	8 37	9 37	14 18	10 12
KY	2W Analog Loop Non-Design		13 00			5 00		15 50	12 26	4 32	2 51	23 92	2 52	9 88
LA	2W Analog Loop Non-Design								7 39			0 43	7 72	5 18
MS	2W Analog Loop Non-Design	1 00	2 20	37 00	8 25	2 60	14 50	22 20	25 83	13 32	16 93	13 15	9 63	13 88
NC	2W Analog Loop Non-Design	11 60	19 17	2 50	17 00	17 67	14 00	13 40	7 31	2 08	15 00	18 05	16 23	12 83
SC	2W Analog Loop Non-Design	28 71	15 91	24 00	4 00	30 00	17 00	16 29	17 47	28 14	26 93	9 05	21 73	19 94
TN	2W Analog Loop Non-Design	2 00	34 50	4 00	15 75		3 60	46 58	36 83	13 48	24 90	28 27	8 79	19 88
Region	2W Analog Loop Non-Design	**11 38**	**15 59**	**14 79**	**10 73**	**12 89**	**11 68**	**19 54**	**16 80**	**12 32**	**15 65**	**14 71**	**12 06**	**14 01**
AL	2W Analog Loop Design	6 04	4 28	5 16	4 24	5 99	6 17	9 12	4 81	5 30	4 72	5 33	3 84	5 42
FL	2W Analog Loop Design	**5 33**	**5 55**	5 34	4 99	5 81	4 89	5 15	6 05	5 32	5 87	5 51	5 68	5 46
GA	2W Analog Loop Design	4 94	4 35	3 53	5 03	4 89	5 01	6 69	5 34	7 02	5 27	6 02	5 34	5 29
KY	2W Analog Loop Design	3 06	4 07	4 05	5 14	7 38	6 68	4 75	4 24	7 83	4 25	3 78	3 49	4 89
LA	2W Analog Loop Design	4 10	5 32	4 83	5 55	5 01	8 86	5 16	4 99	4 93	8 27	4 64	5 10	5 56
MS	2W Analog Loop Design	7 19	7 33	6 17	6 06	7 15	5 31	7 49	6 89	6 20	6 78	5 95	3 30	6 32
NC	2W Analog Loop Design	4 06	6 85	3 81	5 81	4 43	5 59	4 81	4 14	4 58	4 25	4 15	4 75	4 77
SC	2W Analog Loop Design	4 02	4 64	5 24	5 02	6 64	4 83	5 55	3 97	5 29	4 76	6 79	3 68	5 04
TN	2W Analog Loop Design	6 11	6 48	5 24	6 87	6 50	4 84	8 24	6 14	9 61	9 75	6 73	7 13	6 97
Region	2W Analog Loop Design	**4 98**	**5 43**	**4 82**	**5 41**	**5 98**	**5 80**	**6 33**	**5 18**	**6 23**	**5 99**	**5 43**	**4 70**	**5 52**
AL	UNE Loop + Port Combinations	25 86	20 51	17 62	16 83	19 50	17 09	27 62	27 65	28 83	29 13	28 63	21 44	23 39
FL	UNE Loop + Port Combinations	12 60	13 36	11 22	10 96	14 33	13 02	14 58	16 82	17 29	18 45	17 45	16 52	14 72
GA	UNE Loop + Port Combinations	14 73	13 61	10 88	11 25	11 85	11 12	14 95	14 89	16 35	17 57	15 95	14 00	13 93
KY	UNE Loop + Port Combinations	18 08	16 22	13 52	19 66	16 24	17 22	21 59	26 32	29 08	28 65	31 87	23 66	21 84
LA	UNE Loop + Port Combinations	36 15	20 70	18 64	17 32	21 92	16 50	14 33	17 88	23 66	20 53	23 83	18 71	20 85
MS	UNE Loop + Port Combinations	48 84	25 80	24 01	22 28	21 17	18 38	23 43	23 30	26 77	29 78	28 05	20 01	25 98
NC	UNE Loop + Port Combinations	11 01	18 99	8 44	8 75	10 59	9 54	11 75	12 83	13 00	13 48	13 09	11 10	11 88
SC	UNE Loop + Port Combinations	15 71	16 35	12 58	11 68	13 33	11 45	14 10	13 62	17 28	26 93	17 33	16 53	15 58
TN	UNE Loop + Port Combinations	14 86	13 54	10 63	17 35	13 83	12 09	26 77	23 57	25 69	33 39	25 16	17 72	19 55
Region	UNE Loop + Port Combinations	**21 98**	**17 68**	**14 17**	**15 12**	**15 86**	**14 05**	**18 79**	**19 65**	**21 99**	**24 21**	**22 37**	**17 75**	**18 64**

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF KATHY K. BLAKE

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 03-00526

MARCH 12, 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. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes, I filed direct testimony and one exhibit on February 27, 2004.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My rebuttal testimony addresses comments contained in the direct testimony filed by other witnesses in this proceeding on February 27, 2004: Mr. Mark David Van de Water on behalf of AT&T Communications of the South Central States, LLC ("AT&T"), Mr. James D. Webber and Ms. Sherry Lichtenberg representing

MCIMetro Access Transmission Services, LLC and Brooks Fiber Communications of Tennessee, Inc. ("MCI").

Q. ALL PARTIES HAVE DIRECTED THE TENNESSEE REGULATORY AUTHORITY ("AUTHORITY") TO VARIOUS PORTIONS OF THE TRIENNIAL REVIEW ORDER ("*TRO*") AND THE RULES IN SUPPORT OF THEIR POSITIONS IN THEIR DIRECT TESTIMONY WHAT IS THE IMPACT OF THE D C. CIRCUIT COURT OF APPEALS ORDER ON THE TRO IN THIS PROCEEDING?

A. Currently the impact of the D.C. Circuit Court's opinion is unclear. At the time of filing this testimony, the D.C Court had vacated large portions of the rules promulgated as a result of the *TRO*, but stayed the effective date of the opinion for at least sixty days. Therefore my understanding is that the *TRO* remains intact for now, but its content, and the rules adopted thereto, must be suspect in light of the court's harsh condemnation of large portions of the order. Accordingly, I will reserve judgment, and the right to supplement my testimony as circumstances dictate, with regard to the ultimate impact of the D.C. Court's order on this case.

BELLSOUTH'S HOT CUT PROCESS

Q. THE CLECS CITE TO THE FCC'S PROVISIONAL FINDING ON THE HOT CUT PROCESS AS EVIDENCE THAT BELLSOUTH'S HOT CUT PROCESS IS FLAWED. IS THIS VALID?

A. No. The FCC made a provisional national finding regarding hot cuts, but, at the same time, requested the state commissions to examine the issue more closely. As stated in my direct testimony, 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* ¶423) Thus, at the conclusion of this proceeding, the Authority must order a batch hot cut process.

Moreover, the FCC's reasoning on hot cuts in the *TRO* is flawed. The FCC ignored specific data, the same data upon which it relied in its 271 decisions, in favor of vague, unreliable and out-of-date information For example, the *TRO* credited an AT&T assertion that, several years ago, it lost customers in several states, including Texas and New York, because of hot cut difficulties. Conversely, the FCC rejected nearly identical claims made by AT&T when it granted long-distance authority to Verizon and SBC in each of these states. Since that time, the FCC has considered hot cut issues in all other 271 proceedings and has reached the same conclusion - that RBOCs are meeting their 271 obligations. Thus, the FCC has granted their applications. However, the FCC's analysis of the hot cut issue on a national basis in the *TRO,* while inadequate for what it was, says nothing about BellSouth's hot cut process, despite CLEC claims to the contrary.

Q. MCI WITNESS LICHTENBERG, AT PAGES 20-22, SUGGEST THAT THE HOT CUT PROCESS SHOULD MIRROR THE SEAMLESS NATURE OF UNE-P MIGRATIONS AND PIC CHANGES. DO YOU AGREE?

A Absolutely not. To implement the scenario the CLECs advocate would require a huge investment on BellSouth's part to upgrade its existing network because neither BellSouth nor any other RBOC can accomplish electronic loop provisioning ("ELP") today with existing network architectures. Rather than discussing the hot cut process applicable to the network that exists today, the CLECs talk about a process that might only be possible in an entirely new network at some point in the future. BellSouth witness Gary Tennyson discusses this issue in greater detail in his rebuttal testimony.

Moreover, the CLECs' argument that they are impaired without unbundled switching until such time as the UNE-L is equal to the UNE-P is based on the wrong test. The question for the Authority is not whether UNE-P is the same as UNE-L, but rather whether an efficient CLEC can economically enter the market without access to unbundled switching. Because the answer to that question is unequivocally "yes," it is understandable that those CLECs relying upon UNE-P seek to change the question.

Q. MS. LICHTENBERG ALLEGES (PAGES 16-17) THAT THE FCC "RECOGNIZED" THAT HOT CUTS MUST BE "AS SEAMLESS AND TROUBLE-FREE AS THEY ARE WITH LONG-DISTANCE AND UNE-P " IS SHE RIGHT?

A No. In fact, the FCC found exactly the opposite when it flatly rejected AT&T's ELP proposal. The FCC declared that to make the necessary system changes called for by AT&T's ELP proposal "would require significant and costly

upgrades to the existing local network at both the remote terminal and central office. AT&T's ELP proposal proposes to 'packetize' the entire public switched telephone network for both voice and data traffic, at a cost one party estimates to be more than $100 billion. Incumbent LECs state that AT&T's proposal would entail a fundamental change in the manner in which local switches are provided and would require dramatic and extensive alterations to the overall architecture of every incumbent LEC local telephone network. Given our conclusion above, we decline to require ELP at this time.. " (*TRO* ¶ 491). The Authority should give ELP no more consideration than did the FCC.

Q MR VAN DE WATER CONTENDS (AT PAGE 11) THAT THE RATE FOR HOT CUTS SHOULD BE BASED ON ELECTRONIC LOOP PROVISIONING DO YOU AGREE?

A. No, I do not agree, and neither did the FCC. As stated above, the FCC flatly rejected AT&T's ELP proposal. The FCC directed state commissions to approve a batch cut process which it expects will be lower in cost than single hot cut rates. BellSouth has developed such an offering. Mr. Van de Water compares the rate BellSouth charges for PIC changes and UNE-P changes to the rate for hot cuts. As noted above, such a comparison is inappropriate. The cost incurred for PIC changes and UNE-P migrations are different than the cost incurred to perform a hot cut of a UNE-L because the UNE-L hot cut requires physical work. The Authority already has considered these facts and established TELRIC hot cut rates

Q MR. WEBBER STATES (PAGES 21-22) THAT ONE OF THE REASONS ILECS ARGUE AGAINST THE IMPLEMENTATION OF AN AUTOMATED MIGRATION SYSTEM IS TO PRECLUDE THE GROWTH OF UNE-L. DO YOU AGREE WITH HIS ASSESSMENT?

A. No, I do not agree. The creation of an automated UNE-L migration system would be cost prohibitive for all carriers involved in interconnecting to the network. Such a change would be a fundamental change in how the telephone network processes information. The FCC recognized this when they rejected AT&T's ELP proposal Mr. Webber's argument that "the largest hindrance with respect to these automated systems is one of incentive, not of technology" is absolutely incorrect As BellSouth witness Gary Tennyson describes, moving to an automated system, one that is not in place today, would cost billions of dollars to develop and would require deployment of equipment that in many cases does not ever exist at commercially viable levels.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

#528858

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF ALFRED A. HEARTLEY

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO 03-00526

MARCH 12, 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 for BellSouth

Q. ARE YOU THE SAME ALFRED HEARTLEY WHO EARLIER FILED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED TODAY?

A. I will respond to portions of the direct testimonies of Mr. James D Webber on behalf of MCI and Mr. Mark David Van de Water on behalf of AT&T regarding the batch hot cut process.

Q. ON PAGE 18, MR. WEBBER DESCRIBES WHAT HE CALLS "THE POTENTIALLY CHAOTIC SITUATION" THAT COULD RESULT WHEN MULTIPLE TECHNICIANS WORK ON THE MDF. IS HIS SPECULATION CREDIBLE?

A. No. Mr. Weber's speculation about a "potentially chaotic situation" ignores that BellSouth will manage the conversions. As part of this management process, BellSouth has determined the number of technicians that can work simultaneously on a frame. While too many technicians working in a tight location can be cumbersome, our technicians are trained to work efficiently and safely together. In addition, BellSouth intends to schedule the appropriate number of technicians on different shifts. This may require 24 hour scheduling but BellSouth is willing to do such scheduling BellSouth will not permit a "chaotic situation" to occur, as Mr. Webber speculates

Q DO YOU AGREE WITH MR. VAN DE WATER'S ASSESSMENT OF THE WORK REQUIRED IN THE WEST HOLLYWOOD, FLORIDA CENTRAL OFFICE ON PAGES 24-25 OF HIS TESTIMONY?

A. No. Although Mr. Van de Water's analysis of the time required to cutover a UNE-P to a UNE-L does not differ substantially from BellSouth's, his conclusion that such work times will preclude BellSouth from handling anticipated volumes is incorrect. BellSouth's analysis takes into consideration the different times required to complete a conversion depending on the type of service requested (SL1 or SL2) and the type conversion requested for SL1 orders (Coordinated or Non-Coordinated)

Beginning on page 24, Mr. Van de Water uses BellSouth data in an attempt to prove that there is insufficient space on the MDF in the West Hollywood, FL C.O. for enough

technicians to work simultaneously to complete enough conversions to create "meaningful" UNE competition. Again, while our analysis does not differ substantially, the conclusion that Mr. Van de Water draws is incorrect. Mr. Van de Water alleges that completing 104 hot cuts per day cannot support competition Notably, he does not put forth a number of cuts that would, in his view, support competition. Moreover, BellSouth's "worst-case" force model assumes that only 126 cuts per day are required in West Hollywood to handle the UNE-P to UNE-L migration as well as normal growth within the 21-month timeframe. Based on the information provided above, 126 cuts per day would require approximately 12 technicians to complete. Eight technicians can work on the West Hollywood frame simultaneously without impacting productivity Assuming this work is done during the 2 available night shifts to avoid interfering with any other activities, West Hollywood can accommodate up to 16 technicians per day. Therefore, BellSouth can work the required load in West Hollywood, Columbia, and every other wire center in the BellSouth region.

Q. HOW DO UNMANNED CENTRAL OFFICES AFFECT BELLSOUTH'S ABILITY TO HANDLE ANTICIPATED VOLUMES OF UNE-L ORDERS? (VAN DE WATER, AT 27)?

A. Mr. Van de Water's statements beginning on page 39, that unmanned Central Offices and hot cuts involving IDLC will limit BellSouth's capacity to work Hot Cuts in Tennessee are incorrect. It is true that Bellsouth employees do not report to work daily at every Central Office. For those offices with a low volume of work, technicians are dispatched as needed to work the pending load, daily if required. However, while not all offices are

manned daily at the beginning of the workday, all BellSouth Central Offices are manned if work is required. Our force model includes hours for working conversions at all BellSouth wire centers. Thus, BellSouth already has taken into account any so-called "unmanned" offices.

Q. MR. VAN DE WATER DISCUSSES THE IMPACT OF IDLC DISPATCHES ON HIS LOAD PRODUCTIONS AT PAGES 27-28 OF HIS TESTIMONY. DID BELLSOUTH FACTOR THOSE DISPATCHES INTO ITS LOAD PROJECTION?

A. Yes. BellSouth's "worst-case" force model accounts conservatively for dispatching outside technicians to handle conversions involving IDLC. Unlike Mr. Van de Water's analysis, BellSouth's force model bases the number of field dispatches required on the %IDLC in every wire center. The force model assumes that every conversion involving IDLC will require a separate dispatch. In reality a technician would be dispatched to work all of the conversions at a single interface at one time. The assumption is therefore conservative as it is unknown how many conversions will be required at each field interface each day. Based on regional estimates of 4,827 daily outside dispatches, well over 2 2M dispatches could be required to complete the conversions and handle growth. BellSouth took those dispatches into account in its force model.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF MILTON MCELROY JR.

BEFORE THE TENNESEE REGULATORY AUTHORITY

DOCKET NO 03-00526

MARCH 12, 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 respond to certain issues raised in the testimony of Mark David Van de Water of AT&T Communications of the Southern States, LLC ("AT&T"), and Sherry Lichtenberg of MCI WorldCom Communications, Inc. and MCIMetro Access Transmission Services, Inc. ("MCI") by introducing BellSouth's Mass Migration process that, like the Batch migration process described in Ken Ainsworth's Direct testimony, also exceeds the requirements of the TRO.

Q. ALL PARTIES HAVE DIRECTED THE TO VARIOUS PORTIONS OF THE TRO AND THE RULES IN SUPPORT OF THEIR POSITIONS IN THEIR DIRECT TESTIMONY. WHAT IS THE IMPACT OF THE D.C. CIRCUIT COURT OF APPEALS ORDER ON THE TRO IN THIS PROCEEDING?

A. Currently the impact of the DC Circuit Court's opinion is unclear. At the time of filing this testimony, the DC Court had vacated large portions of the rules promulgated as a result of the TRO, but stayed the effective date of the opinion for at least sixty days. Therefore my understanding is that the TRO remains intact for now, but its content, and the rules adopted thereto, must be suspect in light of the court's harsh condemnation of large portions of the order. Accordingly, we will reserve judgment, and the right to supplement our testimony as circumstances dictate, with regard to the ultimate impact of the DC Court's order on this case.

Q. MR. VAN DE WATER AND MS. LICHTENBERG BOTH CRITICIZE BELLSOUTH'S BATCH HOT CUT PROCESS AS INSUFFICIENT, AND

PROVIDE A CONSIDERABLE LIST OF RECOMMENDATIONS FOR INCLUSION IN ANY BATCH PROCESS. PLEASE RESPOND.

A. As described in the Direct 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 Competitive Local Exchange Companies ("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, that was attached to my direct testimony , 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 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.

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF RONALD M. PATE

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 03-00526

March 12, 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 Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. ARE YOU THE SAME RONALD M. PATE WHO PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

A. Yes.

Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to certain issues raised in the testimony of Mark David Van de Water of AT&T Communications of the Southern States, LLC ("AT&T") and Sherry Lichtenberg of MCI Metro Access Transmission Services, LLC ("MCI") and Brooks Fiber Communications of Tennessee, Inc. The issues I will respond

to are related to the ordering of batch migrations, flow-through, the LFACS database, local number portability, and CLEC-to-CLEC migrations.

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.

Q. ALL PARTIES HAVE DIRECTED THIS AUTHORITY TO VARIOUS PORTIONS OF THE TRO AND THE RULES IN SUPPORT OF THEIR POSITIONS IN THEIR DIRECT TESTIMONY WHAT IS THE IMPACT OF THE D C. CIRCUIT COURT OF APPEALS ORDER ON THE TRO IN THIS PROCEEDING?

A. Currently the impact of the DC Circuit Court's opinion is unclear. At the time of filing this testimony, the DC Court had vacated large portions of the rules promulgated as a result of the TRO, but stayed the effective date of the opinion for at least sixty days. Therefore my understanding is that the TRO remains intact for now, but its content, and the rules adopted thereto, must be suspect in light of the court's harsh condemnation of large portions of the order. Accordingly, we will reserve judgment, and the right to supplement our testimony as circumstances dictate, with regard to the ultimate impact of the DC Court's order on this case.

ORDERING UNE-TO-UNE BATCH MIGRATIONS

Q. AT&T'S MR. VAN DE WATER, ON PAGE 13 OF HIS TESTIMONY, CLAIMS THAT BELLSOUTH'S IMPLEMENTATION OF ITS BULK ORDERING PROCESS "DID NOT MEET AT&T'S NEEDS AS DESCRIBED IN THE CHANGE REQUEST." IS HE RIGHT?

A. No. In my direct testimony on pages 3-5, I described in detail the development and implementation of AT&T's change request CR0215 through BellSouth's Change Control Process and I included a copy of the entire change request as Exhibit RMP-1. That discussion included an overview of the requirements meetings held by BellSouth and the CLECs – including AT&T – to review the parameters of the change request. Neither the wording of the change request, nor that of the requirements document for the change request, would lead any reasonable reader to conclude that the change request comprised anything other than a bulk ordering process with project-managed provisioning. Notably, Mr. Van de Water does not cite to any specific way in which the change request fails to meet AT&T's needs

As part of its request, AT&T did suggest an *option* for the provisioning of the cuts: "an option for doing the migration...is that BellSouth and AT&T would schedule the cuts...to take place over a weekend Our experience with this process has been a very low number of customer outages." When it was implementing CR0215, BellSouth determined that the practice of providing either coordinated or non-coordinated hot cuts for the CLECs' UNE-to-UNE batch migrations was more flexible than limiting cutovers to just the weekends. Nevertheless, on February 18, 2004, BellSouth implemented Saturday cutovers as part of the batch hot cut process, as described in Mr. Ainsworth's testimony. Thus, Mr Van de Water's complaint is moot.

Q. ON PAGES 51-52 OF HER TESTIMONY, MS LICHTENBERG COMMENTS THAT BELLSOUTH HAS "RECENTLY BEGUN TO EXPRESS WILLINGNESS TO

IMPROVE ITS EXISTING BATCH ORDERING PROCESS." WHAT IS YOUR RESPONSE?

A. BellSouth has always been willing to improve its already seamless and effective batch hot cut process. BellSouth has, however, declined to establish a formal collaborative because the CLECs' demand for a collaborative on improvements to the manual hot cut processes is disingenuous. Under ordinary circumstances, BellSouth fully supports collaborative discussions. In this instance, however, the CLECs have been very clear in their position that they are allegedly "impaired" by a manual hot cut process, regardless of what improvements are made to that process. Considering this position, there is not a great deal of incentive for BellSouth to establish a collaborative at this juncture. BellSouth also notes that the CLECs' requests for collaboration did not occur until after the commencement of the state TRO impairment cases.

That being said, BellSouth welcomes specific proposals for changes and improvements to this or any other process that would benefit the CLECs and BellSouth. Consequently, although BellSouth has declined to hold a collaborative, it has not refused to collaborate with the CLECs. During the December 10, 2003 meeting of the CCP, the CLECs stated that they were primarily interested in a process to improve the provisioning aspect of the hot-cut process, which is manual, rather than the currently established ordering process. On December 15, 2003, ITC^DeltaCom, on behalf of the CLECs, provided a written request and some materials that it asked BellSouth to consider. BellSouth responded directly to ITC^DeltaCom on January 7, 2004, and forwarded its response to all the CLECs participants in the CCP on January 8, 2004. In this response, BellSouth stated, "CCP will review recommended process changes for the Bulk migration process. Please

submit specific process changes within the scope of CCP via change request(s)." During the week of February 23, 2004 (the week of the first state TRO hearing) the CLECs submitted their first change requests related to the UNE-to-UNE batch migration process to the CCP.[1]

Despite the fact that the CLECs did not submit any specific changes to the batch hot cut process through CCP until late February 2004, BellSouth has been listening to the CLEC criticisms raised in the hot cut workshops around its region and, BellSouth has agreed to incorporate many of those changes into its process I discussed those changes in my direct testimony on pages 8-10, and I will summarize them below

Q. DID THE CLECS HAVE THE OPPORTUNITY TO COLLABORATE ON THE DEVELOPMENT OF BELLSOUTH'S UNE-TO-UNE BATCH MIGRATION PROCESS?

A. Yes. CLECs had the opportunity to collaborate on the development of the batch ordering component of the batch hot cut process when BellSouth developed the process in response to change request CR0215. Very few CLECs attended the user requirements meetings in 2002. MCI (including WorldCom) did not. No CLEC used the escalation or dispute process of the CCP for any questions or problems that it had with the development of the process. As I stated above, no CLEC has submitted a change request to alter the process established by CR 0215 or a change request for a different batch migration process.

[1] The CLECs have submitted seven (7) change requests As of March 10, 2004, BellSouth is still reviewing these change requests for acceptance per the CCP process

Q DID BELLSOUTH PROVIDE THE CLECS WITH THE DOCUMENTATION NECESSARY FOR THEM TO USE THE BATCH ORDERING PROCESS?

A. Yes. As I described in my direct testimony, on page 6, BellSouth has provided CLECs with user requirements, business rules (contained in the *Local Ordering Handbook* or "LOH"), and the *UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration CLEC Information Package* ("CLEC information package"). The original version of the CLEC information package was attached to my direct testimony as Exhibit RMP-2. On February 18, 2004, BellSouth enhanced this process and issued a revise revised version of the CLEC information package, which was attached as Exhibit RMP-2 to my direct testimony.

In addition, BellSouth has provided CLECs with business rules for ordering UNE-to-UNE batch migration. The business rules (an excerpt from the LOH) and the user requirements are attached to this testimony as Exhibits RMP-4 and RMP-5. The user requirements were first distributed via the CCP, and also are posted in the password-protected areas of the CCP web site. The CLEC information package and the LOH are both available on BellSouth's interconnection web site.[2] For CLECs that use the EDI ordering interface, BellSouth has prepared a specifications document for EDI. This document is attached as Exhibit RMP-6, and is also available on BellSouth's interconnection web site [3]

[2] The CLEC information package is located at http //interconnection bellsouth com/guides/html/unes html The LOH is located at http //www interconnection bellsouth com/guides/html/leo html

[3] The specifications for ELMS6 and for TCIF9 are located at http //www interconnection bellsouth com/guides/html/leo html ELMS6 and TCIF9 are the two industry standards supported by BellSouth

In addition, for CLECs that use LENS, BellSouth has provided instructions for ordering batch migrations in the *LENS User Guide* ("LENS Guide") that is posted on BellSouth's interconnection web site for CLECs [4] Attached to my surrebuttal testimony as Exhibit RMP-7 is the section from the LENS Guide that explains how CLECs can submit requests for batch migrations electronically via LENS.

Q PLEASE SUMMARIZE THE ENHANCEMENTS THAT BELLSOUTH MADE TO ITS ALREADY SEAMLESS AND EFFECTIVE BATCH PROCESS.

A. As I mentioned above, and discussed in my direct testimony, despite the fact that the CLECs did not submit any changes requests related to the batch migration process until late February 2004, BellSouth has been listened to and acted on the CLECs' criticisms raised during the hot cut workshops held in its region Here is a summary of the changes that BellSouth made to its already seamless and effective UNE-to-UNE batch migration process on February 18, 2004:

- 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)

[4] The LENS Guide is located at http //www interconnection bellsouth com/guides/html/lens_tafi html I would like to note that this excerpt contains one small error It states that a CLEC can submit two to 100 EATNs That should be two to 99 EATNs or Existing Account Telephone Numbers BellSouth has opened a documentation defect change request to correct the LENS Guide, the change request number is CR1669. The defect is scheduled to be fixed on March 15, 2004

BellSouth also reduced the interval for the project manager to return the bulk notification form to four business days (from seven) for 2 to 99 telephone numbers and to six business days (from 10) for 100-200 telephone numbers. Most of these enhancements are to the provisioning side of the process, which is under Mr. Ainsworth's purview. This process is also described in the CLEC information package (Exhibit RMP-2 to my direct testimony).

FLOW-THROUGH

Q. IN THEIR DIRECT TESTIMONY, THE CLECS' WITNESSES VAN DE WATER AND LICHTENBERG CLAIM THAT BELLSOUTH'S FLOW-THROUGH PERFORMANCE IS DEFICIENT DID THE FCC FIND BELLSOUTH'S FLOW-THOROUGH PERFORMANCE TO BE SATISFACTORY?

A. Yes. In its three Orders approving BellSouth's provision of long-distance service, the FCC specifically concluded that "BellSouth's OSS are capable of flowing through UNE and resale orders in a manner that affords competing carriers a meaningful opportunity to compete "[5]

Q. DID BELLSOUTH MEET ESTABLISHED FLOW-THROUGH BENCHMARKS FOR *ALL* SEGMENTS AT THE TIME OF ITS LAST 271 APPLICATION?

[5] *Order No 02-331 (BellSouth Florida/Tennessee Order)* in FCC WC Docket 02-307, dated December 20, 2002, at paragraph 93 (footnote omitted)

A. No. The FCC recognized in its *Florida/Tennessee Order* that BellSouth had missed the flow-through benchmark for residence and business resale orders, but nonetheless found BellSouth to be compliant with the checklist [6]

BellSouth's application provided PMAP flow-through results for May through July 2002, which were as follows.

Month	Residence Resale	Business Resale	UNE	LNP
May 2002	86.74%	69.54%	82 57%	89 75%
June 2002	88.58%	73.74%	83 84%	83 63%
July 2002	87.70%	73.23%	88.50%	88.50%
Benchmark	95%	90%	85%	85%

Q. HOW DOES BELLSOUTH'S CURRENT FLOW-THROUGH PERFORMANCE COMPARE TO ITS PERFORMANCE AT THE TIME OF ITS LAST 271 APPLICATION?

A. As it has over time, BellSouth's performance continues to improve, and current results show strong overall flow-through improvement since the FCC's *Florida/Tennessee Order*.[7] Using results the August 2003 timeframe that Mr. Van de Water cites, on pages 28, and the last month of data in BellSouth's responses to AT&T's interrogatories 28 and 32, BellSouth's SQM Flow-through Report showed the following:[8]

[6] *Id*

[7] In its *Order*, at paragraph 93, the FCC recognized that "BellSouth's flow-through performance has improved since the BellSouth Georgia/Louisiana and Multistate applications "

[8] It is worthwhile to note that BellSouth began reporting in March 2003, at the direction of the Florida, Georgia, and North Carolina Commissions, further disaggregation of the UNE segment to the UNE-P and UNE-L level As a truer comparison to the numbers reported by BellSouth in its Florida/Tennessee application, the combined UNE segment for August 2003 was 96 13% - well above the previous combined UNE benchmark of 85% existing at the time of BellSouth's application

Segment	Result	Benchmark
Residence Resale	97 31%	95%
Business Resale	88.67%	90%
UNE Loops	86.19%	85%
UNE-P	96 40%	90%
LNP	84.64%	85%

Q. ACCORDING TO THE TABLE ABOVE, BELLSOUTH'S BEST FLOW-THROUGH PERFORMANCE OCCURRED IN THE RESIDENCE RESALE AND UNE-P SEGMENTS PLEASE COMMENT.

A. That is due to BellSouth's conscious efforts to improve flow-through performance in the segments in which the CLECs submitted the vast majority of their LSRs As an example, the following chart – also from the August 2003 Flow-through Report – supports my point, and is similar to activity for a number of months previous to, and since, August 2003.

Segment	Total Mech LSRs	% of Total Electronic LSRs
Residence Resale	129,682	16.4%
Business Resale	8,744	1.1%
UNE Loops	17,943	2.3%
UNE-P	621,101	78.6%
LNP	12,622	1.6%
Total	790,092	100.0%

As the chart demonstrates, the combined Residence and UNE-P segments account for 95% of all CLEC electronic LSR submissions. Based upon current market direction – as dictated by the CLECs' business activities – it is appropriate and logical that BellSouth has concentrated its efforts to date as it has

Q. DOES THAT MEAN THAT BELLSOUTH HAS NOT DEVOTED RESOURCES FOR FLOW-THROUGH IMPROVEMENTS TO THE OTHER SEGMENTS?

A. Absolutely not. In fact, BellSouth has initiatives underway to improve flow-through such that all segments consistently meet the flow-through benchmarks. A quarterly flow-through improvement report is filed with the Florida Public Service Commission that details those efforts, and provides projections as to when BellSouth will achieve the benchmarks in the segments currently not doing so. BellSouth's most recent Quarterly Report (filed December 12, 2003) is attached as Rebuttal Exhibit RMP-3.

Q. WHEN WILL BELLSOUTH MEET THE FLOW-THROUGH BENCHMARK FOR LNP?

A. As indicated in Rebuttal Exhibit RMP-3, BellSouth expected to meet the benchmark in April 2004, after the March implementation of Release 15 0 containing some LNP flow-through improvement items. However, as I will now discuss, BellSouth has exceeded that expectation.

Q. IS BELLSOUTH ALREADY SEEING IMPROVEMENT TO THE FLOW-THROUGH RATE FOR LNP?

A. Yes. Recent data show excellent flow-through rates for UNE-P to UNE-L migrations, which include UNE-L with LNP. In December 2003 and January 2004, using the LENS interface, one Florida-based CLEC submitted electronically via the LENS interface 8,740 LSRs and 5,662 LSRs respectively to migrate its embedded base of UNE-P to UNE-L

with LNP. Data reflects a 99 1% flow-through rate for those LSRs for both months, and this rate greatly contributed to an improvement in the overall LNP flow-through rate. This CLEC's submissions accounted for approximately 45% of all electronic LNP submissions in December and 31% for January. As a consequence of this CLEC's results, the overall LNP flow-through rate was 93.4% for December and 93.3% for January.

Now, I do note that a portion of the electronic LSR submissions did fall out by design for manual processing During these two months, a total of 2,267 of the submissions fell out by design for manual processing by BellSouth's center personnel. What is interesting is why these LSRs fell out by design From an analysis of the 2,267 LSRs that fell out, it was determined that the vast majority, 2,160 LSRs or 98%, fell out due to pending service orders. In other words, this CLEC had pending service orders in process for its own accounts that had not cleared before the CLEC submitted LSRs to migrate the accounts to UNE-L. If the CLEC only had checked its systems for pending service orders, which it should do in the normal course of its operations, these migration requests likely would have flowed through BellSouth's systems as well.

Q. ON PAGE 28 OF HIS TESTIMONY, MR. VAN DE WATER ALLEGES THAT THE FLOW-THROUGH OF UNE LOOP ORDERS IS A CONSTRAINT ON BELLSOUTH'S CAPACITY TO HANDLE UNE-L ORDERS. MCI'S MS. LICHTENBERG ALLUDES TO THE SAME ON PAGE 25 OF HER TESTIMONY. IS THERE ANY MERIT TO THEIR CLAIMS?

A. Not at all, and it is incorrect for Mr. Van de Water and Ms Lichtenberg to suggest that the flow-through rate of the UNE-L segment itself, or as compared to that of another ordering segment (UNE-P), should be the sole basis for the Authority to determine a finding of impairment. In the first place, flow-through for UNE-L has been thoroughly evaluated in the Florida, Georgia, and North Carolina performance measurement dockets, and these commissions decided that UNE-L orders warrant a lower benchmark than that for UNE-P. In the second place, and as I demonstrated earlier, BellSouth currently is meeting the regional disaggregated benchmark for UNE-L.

Further, other factors in addition to flow-through indicate that CLECs are not now impaired (and will not be in the future) in their ability to order UNE loops. This Authority (as did the FCC) should also consider Firm Order Confirmation (FOC) and Reject Timeliness, the accuracy of manual service order processing and the scalability of associated manual processes. I refer the Authority to the testimonies of BellSouth's witnesses Varner and Ainsworth for more in-depth discussions on these other factors.

Q. CAN BELLSOUTH'S ELECTRONIC OSS HANDLE CONTEMPLATED ORDERING VOLUMES IF THERE IS A SHIFT FROM PREDOMINANTLY UNE-P ORDERING TO THAT OF UNE-L AS A RESULT OF STATE COMMISSION AND AUTHORITY ORDERS ELIMINATING BELLSOUTH'S UNE-P OBLIGATIONS?

A. Yes Commercial volume demonstrates that BellSouth has scaled its electronic ordering OSS to meet projected demands. As noted earlier, there were 790,092 electronic LSRs submitted in August 2003. That same month, 26,762 LSRs were submitted manually,

resulting in a total submission volume of 816,854 LSRs. Electronic submissions comprised 96.7%.

It is interesting to note how the electronic LSR volume has grown For August 2002, the number of electronic submissions was 607,211. The total for August 2003 represents a 30 1% increase in just one year. Going back to the total electronic submissions for August 2001 (397,640), current volumes represent a 98.7% increase in two years. This clearly demonstrates BellSouth's ability to scale its electronic ordering OSS to meet demands, and BellSouth will continue to do so.[9]

Q. IN TESTIMONY IN PREVIOUS STATES, AT&T'S WITNESS HAS MISCHARACTERIZED DATA THAT BELLSOUTH PROVIDED IN RESPONSES TO AT&T'S INTERROGATORIES. PLEASE COMMENT.

A. In previous filings, AT&T has mischaracterized the data provided by BellSouth in response to AT&T's interrogatories 28 and 32, which were also filed in Tennessee. That data did not represent flow-through percentages, and BellSouth did not represent those numbers as flow-through percentages.

BellSouth's responses to AT&T's Interrogatories 28 and 32 were responses to AT&T's requests to provide the percent of migration orders (Local Service Requests, or LSRs, converting service to UNE-L and UNE-P) that were fully mechanized as compared to the

[9] This comports with the FCC's findings in its *BellSouth Florida/Tennessee Order* The FCC stated, at paragraph 93, "Further, we find, as we have in previous BellSouth 271 orders, that BellSouth scales its system as volumes increase, and has demonstrated its ability to continue to do so " Also, I mentioned in my direct testimony, the KPMG (now BearingPoint) third party test (part TVV-2) tested the ability of BellSouth's systems to handle future CLEC ordering volumes The test showed that BellSouth's systems are capable of handling a significant increase in CLEC ordering volumes The test included a wide range of product/service request types, including various UNE-L scenarios

total number of LSRs submitted – including both electronic and manual submissions. AT&T did not ask for flow-through percentages, and BellSouth was very clear in its responses as to what the numbers did and did not represent.

Q. HOW DID BELLSOUTH DERIVE THE PERCENTAGES THAT WERE PROVIDED TO AT&T?

A. The percentages provided by BellSouth in response to AT&T Interrogatories 28 and 32 were developed using disaggregated data that is the underlying data used to develop the BellSouth flow-through SQM metric. Added to that was data related to manually submitted LSRs, which is not part of the SQM flow-through calculation.

BellSouth went to great lengths to develop the information requested by AT&T, as there was no existing report to provide it in a manner that was responsive to the interrogatories. BellSouth simply does not retain data in its Performance Measurement and Analysis Platform (PMAP) at that level of disaggregation [10] BellSouth was able to derive from the total number of submitted LSRs a subset of those LSRs submitted only for migration to either UNE-P or UNE-L, and then developed the percentages requested by AT&T.

Q. REGARDLESS OF AT&T'S CONFUSION ABOUT THESE PERCENTAGES, DID BELLSOUTH'S UNE FLOW-THROUGH PERFORMANCE FOR TENNESSEE EXCEED THE AUTHORITY'S BENCHMARKS FOR THE PERIOD IN QUESTION?

[10] The flow-through SQM is a regional measure The Florida, Georgia, and North Carolina Commissions developed benchmarks that require BellSouth to track flow-through for the following segments Residence Resale, Business Resale, UNE-P, UNE-Loops and Local Number Portability (LNP) The flow-through SQM for each of the segments includes performance of all electronic LSRs submitted for *all* activity types within the segment for the given month, not just the subsets of activity types responsive to AT&T's interrogatories

A. BellSouth's August 2003 flow-through rate for UNEs in Tennessee was 96.13% versus the 85% benchmark. Further, BellSouth's disaggregated regional flow-through rate for UNE-P (96.40% vs. 90% benchmark) and UNE-L (86.19% vs. 85% benchmark) both exceeded the benchmarks of the Florida, Georgia, and North Carolina Commissions for the same timeframe

THE LOOP FACILITIES ASSIGNMENT AND CONTROL SYSTEM ("LFACS") DATABASE

Q ON PAGE 35-36 OF HER TESTIMONY, MS. LICHTENBERG OF MCI SPECULATES ABOUT THE ACCURACY OF THE DATA IN THE LFACS DATABASE AND SUGGESTS THAT "CHURN" MAY CAUSE THE QUALITY OF THE DATABASE TO DEGRADE. PLEASE COMMENT.

A. CLECs have repeatedly complained of inaccuracies in BellSouth's Loop Facilities Assignment and Control System ("LFACS") database, and such complaints have been repeatedly rejected. This issue was raised in all three of the BellSouth 271 filings (Georgia/Louisiana, Five-State, and Florida/Tennessee) and all three times, the FCC rejected this complaint on the grounds that BellSouth provides CLECs with the same information it provides to itself. BellSouth offers CLECs access to loop makeup data in LFACS via LENS, EDI, and TAG. LFACS is the same database that is used by BellSouth's retail operations The FCC has recognized that both competing carriers and the incumbent LEC use the LFACS system. Thus, any inaccuracies in the ILEC's database are not discriminatory, because they affect the ILEC in the same fashion as competing carriers *See Kansas/Oklahoma Order ¶ 126*

Nonetheless, BellSouth disagrees with any allegations of widespread inaccurate data in BellSouth's loop makeup databases. Although BellSouth's LFACS database is not perfect, it is very accurate

LFACS is the live, real-time database, the primary source of BellSouth's loop data, and contains certain minimum information about each pair, including assignment data (cable and pair assignments and the serving terminal information), as well as whether the loop is served by copper or digital loop carrier ("DLC") and whether the loop contains load coils This information is updated in a real-time basis each and every time any change is made to the loop assignments for any given service. This information is generally very accurate. Churn, whether it is caused by BellSouth's own customers connecting or disconnecting service or by migrations between BellSouth and CLECs or between CLECs, impacts the database in identical fashion, and the LFACS database is updated, real-time, as changes occur

The inaccuracies referred to by the CLECs are typically associated with detailed loop makeup data (cable makeup and/or loading discrepancies), not assignment data (cable and pair and transmission medium information).

Q. ON PAGE 36 OF HER TESTIMONY, MS LICHTENBERG SUGGESTS THAT "LFACS SHOULD BE AUDITED FOR ACCURACY AND THAT A PROCESS [SHOULD] BE DEVELOPED TO ENSURE THAT IT IS ACCURATELY MAINTAINED IN REAL TIME WHEN THE ILEC ALTERS OR CHANGES ITS LOOP PLANT " IS THIS NECESSARY?

A. Absolutely not. Ms. Lichtenberg mistakenly believes that BellSouth does not have a process to maintain the data in its LFACS database. This is not true. As I said before, the information in LFACS is updated in a real-time basis each and every time any change is made to the loop assignments for any given service.

BellSouth is continuously updating and/or populating LMU data in LFACS as Engineering Work Orders are issued Additionally, each time the manual Loop Makeup service inquiry process is used, BellSouth loads the resulting LMU information into LFACS for future queries. Thus, the LFACS database improves on a daily basis, and will continue to do so.

An "accuracy audit" is unnecessary. While BellSouth's LFACS database is not perfect, it is not discriminatory in any way, as any inaccuracies negatively affect BellSouth just as they negatively impact CLECs It is in BellSouth's best interest to ensure that LFACS remains very accurate, and BellSouth already does this, as I have described above.

LOCAL NUMBER PORTABILITY ISSUES

Q. ON PAGE 43 OF HER TESTIMONY, MCI'S MS. LICHTENBERG SPECULATES, WITHOUT PROVIDING ANY EVIDENCE, THAT "IT IS UNCLEAR WHETHER NPAC WILL BE ABLE TO HANDLE THE VOLUMES OF TRANSACTIONS THAT WOULD OCCUR IN A DYNAMIC UNE-L MARKET " DOES THAT MAKE SENSE?

A. No, it does not Similarly, Ms Lichtenberg states on page 9 of her testimony that "outside systems such as the NPAC have not had to deal with mass markets customer migrations," and, therefore, she suggests that an "untested and potentially unready" NPAC will not be able to respond under the new UNE-L environment.

Although NeuStar (not BellSouth) is the NPAC administrator, BellSouth's positive experience with NeuStar renders Ms Lichtenberg's speculative concerns on both points unfounded. First and foremost, NeuStar is obligated by its contracts with service providers to handle industry-wide portability volumes regardless of the product (in this case, UNE-L). Second, BellSouth, among other service providers in the Southeast region, supports NeuStar by providing forecast information (via the NPAC Forecasting Group, or NFG) that NPAC uses for capacity planning and implementation. All local, long-distance, and wireless carriers in the region have the same opportunity to provide forecasts through NFG to assist NeuStar in developing an optimally efficient process It is unknown whether MCI provides such forecasts.

To illustrate the NPAC's volume-handling capability, consider that total transactions[11] between service providers and the NPAC jumped from 480,831 in November 2002 to 1,219,923 in November 2003 - a significant increase of 154% in a year's time. The NPAC has successfully met the increased transaction demand from BellSouth - as well as that from other service providers in the region - because of due diligence in capacity planning with its regional forecasting partners There is simply no reasonable basis to

[11] The numbers of transactions cited represent only those that are 'billable' by NPAC to the service providers, specifically modifies, deletes and activates These are the only transactions for which there are accurate counts When added to other 'non-billable' transactions (e g , create and concur), the true transaction total handled by NPAC is significantly higher

believe that NPAC will be unable to handle the number of the types of transactions envisioned by Ms. Lichtenberg

CLEC-TO-CLEC MIGRATIONS

Q. STARTING ON PAGE 26 OF HER TESTIMONY, MS. LICHTENBERG OF MCI, RAISES ISSUES RELATED TO CLEC-TO-CLEC MIGRATIONS. MR. VAN DE WATER OF AT&T ALSO COMMENTS ON CLEC-TO-CLEC MIGRATIONS ON PAGE 36 OF HIS TESTIMONY. PLEASE COMMENT.

A. BellSouth does perform CLEC-to-CLEC conversions of unbundled loops. BellSouth's CLEC-to-CLEC conversion product is described in the *CLEC to CLEC Conversion for Unbundled Loops* document, which is located at the Interconnection web site.[12] As Mr. Ainsworth has testified, CLEC-to-CLEC loop conversions may be ordered individually or as a project. Also, as I discussed above, on February, 18, 2004, BellSouth enhanced its already seamless and effective batch migration ordering process to include CLEC-to-CLEC UNE-P to UNE-L Further, BellSouth is also working to include UNE-L to UNE-L migrations in the batch hot cut process.

The issues described by Mr. Van de Water and Ms Lichtenberg, however, have nothing to do with BellSouth's already seamless and effective hot cut process. Instead, the issues about which the CLECs complain having nothing to do with BellSouth. Rather, they are issues related to the CLECs' transactions with each other, and their apparent inability to cooperate with each other. Hence, these issues are not relevant to the question of whether BellSouth's process impairs the CLECs without access to unbundled local switching. I

[12] http //www interconnection bellsouth com/guides/unedocs/c2c pdf

would, however, like to discuss the collaborative process that is currently underway to develop the rules to govern the migration of UNE loops among the CLECs.

Q. PLEASE DESCRIBE THIS COLLABORATIVE PROCESS AND ITS ACTIONS.

A. The end user migration collaborative is part of the Telecommunications Competitive Interests Forum, which is under the auspices of the Florida Commission. The purpose of the collaborative is to develop the rules for the migration of UNE loops or UNE-L among the CLECs, first for voice grade circuits, and then for data circuits Some of the participants are: AT&T, Sprint, MCI, Allegiance, Verizon, and BellSouth.

The collaborative has submitted a draft of the migration rules for voice grade circuits to the Florida Commission. The Commission requested comments from the participants, which were due on September 29, 2003 The participants updated their comments by November 13, 2003. On November 20, 2003, at a regularly-scheduled meeting of the Telecommunications Competitive Interests Forum, the parties and the Florida Commission discussed four unresolved issues related to the draft migration rules. During the meeting, the parties were able to resolve two of the four issues. During the next meeting on December 15, 2003, the parties were able to resolve one of the two remaining issues.

Q. WHAT IS THE ONE REMAINING UNRESOLVED ISSUE?

A. This table below shows the issue and BellSouth's position on it. This issue is still open primarily because of issues related to Customer Proprietary Network Information ("CPNI").

	Issue	BellSouth Position
1	Should the ILEC (as DSP and/or NSP) be required to provide CSR and Transition information for CLECs' customers? DSP=Digital Service Provider NSP=Network Service Provider CSR=Customer Service Provider	No, for both CSR and Transition data the old Local Service Provider (LSP) has the most current, complete, and accurate end user information that will be available to the new LSP Only the minimum data required to support the LSP care of their end user service is retained by the ILEC. The ILEC is required to notify the current LSP when ILEC initiated changes are made to the content of the end user's CSR, Directory Listings, or Transition information. There is no requirement for the current LSP to notify the ILEC for LSP or end user initiated changes to these records. Further for Transition information, there is no requirement or reliable method for the ILEC to associate an end user's telephone number or data service to the old LSP circuit identification. Concerning CSR data, for UNE-P or Resale end-user accounts, BellSouth responded to a CCP request (July 2003) that provided a method where CLECs may view the customer service records maintained by BellSouth for an end-user currently served by another CLEC With this mechanized process, CLECs may authorize other CLEC to view their end-user's records maintained by BellSouth. CLECs that have not provided permission to another CLEC for viewing their end-user records maintained by BellSouth must request this information directly from the incumbent CLEC BellSouth CSR content for end-users that have migrated to facility-based providers contain only a record that the end-user has ported out their telephone number.

Q. WILL THE END USER MIGRATION RULES BE USED REGIONALLY?

A. After the Florida collaborative establishes the end user migration rules for voice grade circuits, the participants plan to use the rules as guidelines for establishing rules in the other states in BellSouth's region. The participants plan to use the end user migration rules for data circuits in the same manner, once those rules have been established.

Q. ON PAGES 33-34, MS. LICHTENBERG PROPOSES THE ESTABLISHMENT OF A "DISTRIBUTED CSR DATABASE" TO BE SHARED AND MAINTAINED BY THE CLECS AND ILECS. WHAT IS YOUR RESPONSE?

A. If the CLECs are having problems obtaining CSR information for CLEC-to-CLEC UNE-L migrations, it is because they apparently are not able to cooperate with each other and share CSRs information. Although BellSouth certainly agrees that the CLECs need this information from each other, as Ms Lichtenberg describes, in order to migrate UNE-Ls from one CLEC to another, BellSouth does not agree with is Ms Lichtenberg's approach to facilitating the transfer of this information.

Q. MS. LICHTENBERG, ON PAGE 32-33 OF HER TESTIMONY, SPECIFICALLY DISCUSSES THE AVAILABILITY OF CIRCUIT IDS FOR CLEC-TO-CLEC MIGRATIONS. DO CLECS NEED CIRCUIT IDS TO MIGRATE UNE-P TO UNE-L?

A. No. CLECs do not need circuit IDs to migrate UNE-P to UNE-L, either individually or in bulk, because UNE-P is on BellSouth's switch. CLECs may need circuit IDs when they are performing CLEC-to-CLEC migrations of UNE-L. The CLEC that is gaining the end user should obtain the circuit ID information from the CLEC that is losing the end user. The issue of circuit IDs related to CLEC-to-CLEC migrations is being handled

by the parties participating in the end user migration collaborative under the Florida Commission's Telecommunications Competitive Interests Forum.

Q. PLEASE EXPLAIN WHY BELLSOUTH DOES NOT HAVE INFORMATION, SUCH AS THE CSR AND CIRCUIT ID?

A. After a CLEC has established service to an end user with UNE-L, BellSouth does not know what kind of services the CLEC is providing to the end user The CLEC maintains its own records, including customer service information and circuit IDs, for its UNE-L end users Consequently, the CLECs should be sharing such information with each other (rather than BellSouth serving as a central depository) because they have the information on their customers served by loops, and BellSouth does not. Additionally, this issue is not relevant to the question of whether BellSouth's process impairs the CLECs without access to unbundled local switching.

Q. HOW DOES BELLSOUTH BELIEVE THAT THIS MATTER SHOULD BE APPROACHED?

A First, BellSouth believes that it and the CLECs should continue to deal with the matters surrounding the sharing of CSR information and other data among the CLECs as part of the Telecommunications Competitive Interests Forum under the Florida Commission.

Second, there is another, more sensible, approach to sharing information, than that proposed by Ms Lichtenberg Just as BellSouth has opened its OSS to the CLECs, so the CLECs could be required to maintain their own records and to provide fully-integratable,

machine-to-machine electronic interfaces with each other at the CLECs' cost. Various measurements and penalties could also be established to ensure that the CLECs cooperate with each other and provide the necessary information with each other in a timely manner. This is a more direct resolution to the problem than imposing additional unwarranted obligations on BellSouth, which is a third party in CLEC-to-CLEC transactions

Q. HAVE ANY INDUSTRY STANDARDS BEEN DEVELOPED FOR CLEC-TO-CLEC MIGRATIONS?

A. No, not yet. The industry standards organization, the Ordering and Billing Forum ("OBF"), however, has begun to consider the issue of multi-provider migrations, including CLEC-to-CLEC migrations AT&T is one of the sponsors of this issue at the OBF, along with the Alliance for Telecommunications Industry Solutions ("ATIS") and Cap Gemini Ernst & Young.

Q. IS IT FAIR TO SAY THAT THE ISSUE OF CLEC-TO-CLEC MIGRATIONS IS BEING ADDRESSED?

A Absolutely. The appropriate fora for other CLEC-to-CLEC migration matters are the Florida Commission's Telecommunications Competitive Interests Forum and the industry standards organization. To reiterate, the CLEC-to-CLEC migration issues raised by the CLECs are not relevant to the question of whether BellSouth's current process impairs the CLECs without access to unbundled local switching, particularly given that BellSouth

has agreed to include CLEC-to-CLEC migrations in the batch hot cut process, as discussed in this testimony and in Mr. Ainsworth's rebuttal testimony.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Exhibit No. RMP-3

BELLSOUTH

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December 12, 2003

Lisa Harvey
Florida Public Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32302

RE Flow through Report

Dear Lisa,

Attached is a copy of BellSouth's flow – Through improvement plan progress report. If you have any further questions, please do not hesitate to call me.

Sincerely,

MaryRose Sirianni

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

Investigation into the establishment Of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies	)	Docket No 000121-TP
	)	Filed: December 12, 2003

BELLSOUTH'S FLOW-THROUGH IMPROVEMENT PLAN PROGRESS REPORT

OVERVIEW

In its Performance Metrics Order, the Florida Public Service Commission ("Commission") ordered BellSouth to file a Flow-Through improvement plan by July 30, 2002 describing how it intends to achieve the Service Quality Measure Flow-Through benchmarks and show significant improvement in 2002. The Commission opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of Operations Support Systems ("OSS") provided for Competitive Local Exchange Carriers' ("CLECs") use by Incumbent Local Exchange Carriers ("ILECs"). Associated with the performance metrics is a monitoring and enforcement program to ensure that CLECs receive nondiscriminatory access to the ILEC's OSS.

BellSouth filed its first status update to the Commission on October 30, 2002. In response to the Commission's request dated August 18, 2003, BellSouth provided to the Commission in a September 11, 2003 filing performance updates in the categories outlined in its original plan report (actual and projected results), as well as the status of the implementation of flow-through improvement items.

At the time of that filing, BellSouth proposed – and the Commission agreed – that subsequent quarterly progress reports (beginning with this one) would focus solely upon segments that do not meet the benchmark for at least 2 out of 3 months within the subject quarter The Commission further requested that the reports include updates for segments

that failed to meet the benchmark in any two consecutive months in order to capture segments that failed only the last month of the previous quarter and only the first month of the succeeding quarter.

Pursuant to that agreement, BellSouth presents its first such report. The Commission will find that two (2) segments – Business Resale and LNP – fell within this category for the August-October 2003 timeframe. Additionally, BellSouth provides an updated Flow-Through Improvement Projection chart.

Business Resale

As reported in September 2003, BellSouth expects to continue to make progress toward meeting the Percent Flow-Through Business benchmark of 90%. BellSouth reaffirms its assessment that attaining and maintaining a 90% benchmark in this segment will be a challenge. To reiterate, this segment's complexity – coupled with its low volume -- makes it difficult to realize significant flow-through improvement beyond about 85% The business segment comprises only 1.25% of total mechanized LSR volume for October 2003.

Results for August 2003 were consistent with those reported for this segment for July 2003 September 2003 results declined due to a defect introduced with the implementation of a flow-through improvement item in Release 13.2 on September 13, 2003. BST-caused errors increased significantly during the week following the release, impacting flow-through. The defect was corrected on September 20, 2003. Results for October 2003 returned to levels consistent with those of July and August.

In its September 2003 report, BellSouth indicated that it expected some Local Exchange Service Order Generator (LESOG) flow-through improvement items to be implemented in Release 14 0 on November 23, 2003. Due to the complexity of the release, which included an industry-directed software map change (ELMS6) and the FCC-mandated Wireless Local Number Portability (WLNP) implementation, BellSouth was not able to introduce additional flow-through improvements as originally planned. Those items have been deferred until the implementation of Release 15.0 in March 2004. BellSouth has, therefore, revised its projections for this segment. Based upon current

performance and planned improvements, BellSouth expects to reach the 90% benchmark for this segment in June 2004.

Local Number Portability (LNP)

BellSouth implemented the facility-check-before-FOC (Firm Order Confirmation) functionality for North Carolina on August 1, 2003. As anticipated, the LNP results for August reflected a similar degradation of performance as experienced with the implementation of this functionality previously in Florida and Tennessee. That carried forward for a portion of the drop in the September and October LNP flow-through results

September and October results were further skewed downward due to a defect that inhibited fully mechanized FOCs from being sent for certain types of LNP requests in the three (3) states where a facility check before FOC is required. Importantly, service orders for those requests were mechanically generated according to process despite the defect. There was no adverse impact to the actual provisioning process.

Upon discovery of the defect, BellSouth implemented a manual process that allowed its Local Carrier Service Center (LCSC) representatives to trigger the return of mechanized FOCs for the affected types of LNP requests. On November 30, 2003, BellSouth implemented interim mechanized functionality to electronically trigger the return of mechanized FOCs. On December 7, 2003, BellSouth implemented a final code change to fix the defect Although November 2003 LNP performance will also be negatively impacted by the defect, BellSouth expects that December 2003 LNP performance will return to the August 2003 pre-defect levels.

Approximately 1,200 LSRs were impacted by this defect in October, representing 56% of the total LNP LSRs with BellSouth errors (2,131 BST-Caused Fallout). The low volume of total mechanized LNP requests (13,166) – coupled with the relative high number of LNP requests affected by this defect – created a significant impact on segment performance. The LNP segment, however, represents only 1 56% of total mechanized LSR volume for all segments in October. Based upon current performance and planned improvements, BellSouth expects to reach the 85% benchmark with April 2004 data,

following the March 2004 implementation of Release 15 0 containing LNP flow-through improvement items

Conclusion

The Flow-Through Improvement (FTI) project continues to identify items to improve the Business Resale and LNP segments Flow-through improvement items will be implemented throughout 2004 to improve performance in these two segments that comprise less than 3% of the total mechanized LSR volume.

The following chart provides BellSouth's projected timelines for each flow-through segment, showing current performance and expected improvements.

FLOW-THROUGH IMPROVEMENT PROJECTION

Category	Residence Resale		Business Resale		UNE		LNP	
Benchmark	**95%**		**90%**		**85%**		**85%**	
Actual/ Projected Performance	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected
Jul 02	87.70		73.23		89.13		88.50	
Aug 02	89.52		76.17		87.94		88 09	
Sep 02	90 20		77.80		89.81		88.81	
Oct 02	92 25		80.65		92.71		86.53	
Nov 02	94.52		78.62		93.98		85.46	
Dec 02	93.55		81.40		92.21		82.81	
Jan 03	87.61		82.08		92.26		82.48	
Feb 03	86.95		82.34		95.57		76.45	
Mar 03	95 64		83.50		96.33		76 99	
Apr 03	97 95		87.11		96.11		79.82	
May 03	97.82		87.43		96.90		76.65	
Jun 03	97 43		86 15		95.88		83.05	
Jul 03	97.25		88 82		95.38		86.41	
Aug 03	97 31		88 67		96 13		84 64	
Sep 03	97 49		85.79		95.64		78.89	
Oct 03	97 38		86.33		96 63		74.00	
Nov 03		97.38		86.33		96.63		69.15
Dec 03		97.38		86.33		96 63		83.05
Jan 04		97 38		86 33		96.63		84.05
Feb 04		97.38		86 33		96.63		84.05
Mar 04		97 64		87 73		97.54		84.78
Apr 04		97.72		88 19		97.84		85.02
May 04		97.72		88 19		97.84		85.02
June 04		98.12		90.05		98.15		86 44

BELLSOUTH
Local Ordering Handbook

Section 3
Ordering

LSOG6 / ELMS6

Release 14.0 / Version 14.0B
Posting Date November 24, 2003

Notice

BellSouth® Telecommunications reserves the right to revise this document for any reason, including but not limited to, conformity with techniques or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

PUBLIC

2.12 REQTYP B - UNE to UNE Bulk Migration

General Business Rules

UNE to UNE Bulk Migrations is an electronic process designed to allow BellSouth® CLEC customers to submit a minimum of 2 and up to and including a maximum of 99 LSR requests at one time with minimal field input to migrate existing non-complex services [Residence/Business] Port/Loop Combinations (UNE-P) to Loop w/LNP.

A new outbound reject message for bulk packages shall be used for bulk package rejects and shall consist of the following fields
CC
BOPI
BULK VER
STATUS CODE
STATUS MESSAGE
ERROR CODE(s)
ERROR MESSAGE(s)
PON Statuses---Bulk Package summary

The PON status shall consist of the following statuses:

- LSR clarified, with the system sending a clarification or autoclarification = **Clarified**
- LSR cancelled, with FOC sent on SUP 01 sent to the CLEC = **Cancelled**
- LSR completed, completion notice sent when all service orders completed and all TNs have been ported = **Completed**
- LSR FOC'd, with FOC sent to the CLEC = **FOC**
- LSRs have been accepted by the solution, but they have not been processed enough to be clarified or FOC'd = **Pending**

The following general business rules apply to UNE to UNE Bulk Migrations BULK packages:

- **All Bulk orders are project managed.**
- **Shall only apply to migrating existing non-complex (RES/BUS) Port/Loop Combination (UNE-P) services to Loop w/LNP LSRs, REQTYP B, with ACT of V, LNA of V, NPT is 'D' (LNP).**
- **The fields BOPI (Bulk Ordering Package Identifier) and BULK VER (Bulk Version) shall be added to the ELMS 6 map for all return transactions, FOCs, CNs, POS, Rejects, Clarifications and Jeopardies.**
- **When a Mechanized Loop Make Up/w FRN (Facility Reservation Number) is requested, CLEC must submit Bulk order package to BellSouth® within 24 hours of receiving FRN.**

- **The web based application [UNE to UNE Bulk Migration Bulk Package GUI] will allow users to submit individual SUPs, types 01, 02, and 03, on individual LSRs associated with a bulk package.**
- **CLECs shall have the ability to submit a supplement to cancel the entire UNE to UNE BULK package, which includes canceling all remaining PONs associated with a BULK package, or have the ability to cancel an individual LSR via SUP.**
- **Service order processing shall be the same as REQTYP BB today, *unless specified otherwise in this document.***
- **For BULK Ordering, the fields shown in the R/C/O tables for UNE to UNE BULK Migrations will be supplied by the CLEC via the BULK Order.**
- **For BULK Ordering, current SOMEC charges will apply.**
- **A Complex Service EATN must be resubmitted as a single LSR, with a different PON#.**
- **UNE to UNE Bulk migration is applicable for ELMS 6 *only*.**
- **A UNE Loop will be provided for each Porting TN.**
- **CLECs shall have the ability to view a summary of the BULK LSR in both the raw data form and individual LSR form for each EATN.**
- **Manual (Faxed) LSR Requests are *prohibited* for UNE to UNE Bulk Migrations.**
- **If a UNE bulk package is received without a required field, it will be rejected.**
- **If any of the individual LSRs cannot be created from the bulk package due to error conditions, the entire bulk package shall be rejected. This applies to both initial and supplemental Bulk Packages.**
- **When requesting a SUP to Cancel on a UNE to UNE BULK Package, the Company Code, Supplement, Bulk Order Package ID and BULK Version will be required.**
- **For UNE BULK ordering, a mixture of Loop types can*not* be handled as a part of the same Bulk request.**
- **Complex UNE P accounts are *prohibited* on a UNE to UNE Bulk request.**
- **For UNE to UNE BULK package Supplemental LSRs, SUP 02 and 03 are prohibited (at the Global level), but are allowed at the account level.**
- **For UNE to UNE BULK package Supplemental LSRs, individual PON data is prohibited (at the Global level), but is allowed at the account level.**
- **If a supplemental LSR (at the Global level) is sent, and the initial BULK request has not been received, the SUP LSR will be rejected.**

- **For all initial and supplemental with BOPI field populated, the LNP-GW (LNP GateWay) will always return a clarification, regardless of the error type [i.e., 1st or 2nd level edits].**
- **If CLEC is requesting specific EATNs to be ported together, CLECs may indicate Desired Due Dates (DDD) via Project Manager BellSouth® UNE P to UNE L Bulk Migration Project Notification form, IF APPROVED; CLECs would then enter the negotiated DDD(s) on the LSR at the Account level.**

This unique ordering process allows the CLEC to populate a specific set of fields at a Global level (one time), and a specific set of fields at the Account and Line level to generate multiple LSR's.

A unique Graphical User Interface (GUI) has been developed for processing UNE to UNE Bulk Migration orders. The GUI will utilize most of the same fields from the existing LSR, EU, and LS forms, however the GUI will present them in a Global, or Account level format for order submission To assist BellSouth® customers in determining which section of the Data Element Dictionary the fields may be found in the following matrix may be used:

Field Name	R/C/O Table	Data Dictionary Section
BOPI	Global	LSR-Admin section
BULK VER	Global	LSR-Admin section
CC	Global	LSR-Admin section
REQTYP	Global	LSR-Admin section
ACT	Global	LSR-Admin section
LNA	Global	LSR-Service Detail section
TOS (Default)	Global	LSR-Admin section
CCNA	Global	LSR-Admin section
ACNA	Global	LSR-Bill section
CIC	Global	LSR-Admin section
NNSP	Global	LSR-Admin section
INIT	Global	LSR-Contact section
INIT-TEL-NO.	Global	LSR-Contact section
INIT-FAX-NO.	Global	LSR-Contact section
IMPCON	Global	LSR-Contact section
IMPCON-TEL-NO.	Global	LSR-Contact section
DSGCON	Global	LSR-Contact section
DSGCON-STREET	Global	LSR-Contact section
DSGCON-CITY	Global	LSR-Contact section
DSGCON-STATE	Global	LSR-Contact section

4.13 UNE to UNE Bulk Migration

Product Listing

UNE to UNE Bulk Migrations

(LSR) Package Entry Screens

The following chart illustrates the required, conditional and optional forms/screens for ordering this service. Detailed information will follow to assist you in filling out each of these screens.

Package UNE to UNE Bulk Migrations		
Global level	Account level*	Line level**
R	R	R
R = Required C = Conditional O = Optional		

* = per EATN

** = per PORTED TN.

Completing the (LSR) Package Entry Screen

The Required, Conditional and Optional (R/C/O) fields on the (LSR) Package Entries will be given for the valid **REQTYP/ACT combination** in the Section.

The following chart shows all of the valid account level activities for this requisition type.

REQTYP	ACTIVITY LEVEL
B - UNE to UNE Bulk Migrations	V

THE ONLY VALID ACT is V

Account level activities (ACT) apply to the entire account. The ACTs are defined below:

V = Full Conversion of service **as specified** to new Local Service Provider (LSP), includes UNE to UNE Bulk Migrations

Line level activities (LNA) apply to the specified line only. The valid LNAs are listed below:

V = Conversion or Migration to new LSP **as specified** (specify only those changes from existing service), includes UNE to UNE Bulk Migrations

The following chart gives the valid LNAs for each account level activity (ACT) and the associated LSNP screen usage

REQTYP is:	Global ACT is:	Account ACT is:	Line Level (Entry) is:
B - UNE to UNE Bulk Migrations	V	V	Required

The Required, Conditional and Optional (R/C/O) fields for the UNE to UNE Bulk Migration (LSR) Package is listed according to the LINE Level in the **Line Level Table(s)**.

The following tables show the Required, Conditional and Optional (R/C/O) fields on the valid forms/screens for this product All unmentioned fields are either invalid, not applicable, prohibited or not supported When fields are populated which are not supported by BellSouth, these not supported fields will be ignored Populating any other fields may result in a fatal reject or a clarification of the service request

Please note the following codes
- Optional fields marked with an asterisk (*) force at least one of the conditional fields to become required when populated
- Fields used only for manual orders are followed by (M)
- Fields used only for electronic orders are followed by (E)
- For fields marked with a DOUBLE asterisk (**) please refer to the Data Dictionary for clarification

See the Data Dictionary Section for additional information on each field

ACT Tables· Reqtyp B, UNE to UNE Bulk Migrations

ACT= V: LSR Account

Required

AN (E)	BAN1 (E)	BI1 (E)
DDD (E)	EATN (E)	ELT (E)
MI (E)	NAME (E)	PON (E)

Conditional

BAN2 (E)	BI2 (E)	RESID (E)

Optional

CHC (E)	TOS (Override) (E)	VER (E)

ACT= V: LSR Global

Required

ACNA (E)	ACT (E)	ACTL (E)
BOPI (E)	CC (E)	CCNA (E)
D/TSENT (E)	IMPCON (E)	IMPCON-TEL NO (E)
INIT (E)	INIT-FAX NO (E)	INIT-TEL NO (E)
LNA (E)	NC (E)	REQTYP (E)
TOS (Default) (E)		

Conditional

DSGCON (E)	DSGCON-CITY (E)	DSGCON-STATE (E)
DSGCON-STREET (E)	DSGCON-TEL NO (E)	DSGCON-ZIP CODE (E)
NCI (E)	SECNCI (E)	

ACT Tables: Reqtyp B, UNE to UNE Bulk Migrations

Optional

BULK VER (E)	CIC (E)	DRC (E)
DSGCON-FAX NO (E)	DSGCON-FLOOR (E)	DSGCON-ROOM (E)
NNSP (E)		

ACT= V: LSR Line

Required

LNUM (E)	PORTED NBR (E)

Conditional

CABLE ID (E)	CFA (E)	CHAN/PAIR (E)
CHAN/PAIR 2 (E)		

BELLSOUTH

ENCORE User Requirements for

UNE to UNE Bulk Migrations

FINAL

CCP CR 0215

CR25397/ENC13780.DOC

Version 9.0

Oct 09, 2002

Created [1/18/2002]
Revised 10/9/02

Exhibit No. RMP-5

ENCUserReq

CR25397/ENC13780 DOC

Table of Contents

SCOPE
1.1 BUSINESS IMPLICATIONS

This feature will allow the users (CLEC community) to submit a specific type of LSR in a bulk order format through Bellsouth's CLEC interfaces: EDI, LENS, TAG, and SERVICEGATE GATEWAY when available. Those LSR types will be to migrate existing Port/Loop Combination services to Loop with Local Number Portability (LNP) services.

.1.1.1. Current Process

Current Process	
•	Currently, there are no bulk ordering processes to allow migrations of Port Loop Combo services to Loop with LNP services.
•	Currently, LNP applications do not interface with LENS.
•	Individual LSRs for REQTYP B's are available via EDI and TAG, as well as individual FAX LSRs.

.1.1.2. Expected Process

Expected Process	
•	Bellsouth's CLEC Interfaces: EDI, LENS, TAG, and SERVICEGATE GATEWAY, when available, will allow a bulk order process for LSRs, migrating existing port/loop combination services to Loop w/LNP services. (REQTYP B, ACT V, all LNA V)
•	The feature allows the ability to request and receive status and image of a single LSR of REQTYP B or a status and image of a bulk order of REQTYP B via LENS, TAG, and SERVICEGATE GATEWAY, when available

2. USER REQUIREMENTS

Requirement No.	User Requirement
UR13780.0010	This feature is applicable for TCIF Issue 9.
UR13780.0020	The bulk order LSRs, allowable via EDI, LENS, TAG and ServiceGate Gateway, when available, shall only apply to migrating existing non-complex Port/Loop Combination services to Loop w/LNP LSRs, REQTYP B, with ACT of V, all LNA of V The specific applicable Port/Loop Combination products are outlined in Appendix A.
UR13780.0022	Moved to Requirement 0064
UR13780.0025	Requirement Deleted
UR13780.0030	The bulk order LSR package may consist of a minimum of 2 and up to and including 99 EATNs This will be a BellSouth tunable value and initially set as a minimum of 2 and a maximum of 99.
UR13780.0035	Requirement Deleted
UR13780.0038	If the conditions in Requirement .0030 are not met, the following error message shall be returned to the user: Bulk Order Package must be a minimum of 2 and up to and including 99 EATNs

Requirement No.	User Requirement
UR13780.0040	The initial bulk order LSR package shall consist of the following Common Level fields, once per package. BOPI-Bulk Order Package Identifier (Required, .0045, .0045a, .0045b, .0045c) BULK VER (Optional) CC (Required) REQTYP (Required) ACT (Required) LNA (Required) TOS (Default) (Required) CCNA (Required) ACNA (Required) CIC (Required) NNSP (Optional) INIT (Required) TEL-NO-INIT (Required) FAX-NO-INIT (Required) IMPCON (Required) TEL-NO-IMPCON (Required) DSGCON (Conditional) STREET-DSGCON (Conditional) CITY-DSGCON (Conditional) STATE-DSGCON (Conditional) ZIP-CODE-DSGCON (Conditional) FLOOR-DSGCON (Optional) ROOM-MAIL-STOP-DSGCON (Optional) TEL-NO-DSGCON (Conditional) FAX-NO-DSGCON (Optional) NC (Required) NCI (conditional) SECNCI (conditional) ACTL (Required) DRC (Optional) D/T SENT (Required)
UR13780 0041	For initial bulk order LSR packages, SUP is prohibited.
UR13780.0042	If the condition in Requirement .0041 is not met, the following error message shall be returned to the user: SUP prohibited on initial Bulk Order Package
UR13780.0043	If any of the fields identified in .0040, with the exception of BULK VER, D/T SENT, or DRC, are different on the individually submitted Supplemental 02 and 03 LSRs when compared to the original LSR, the Supplemental should be auto-clarified.

Requirement No.	User Requirement
UR13780.0043a	If the ERL field is different on the individually submitted Supplemental 03 LSRs when compared to the original bulk ordered LSR, the Supplemental should be auto-clarified
UR13780.0044	If the conditions in Requirement .0043 or .0043a are not met, the following error message shall be returned to the user: &Field Name&can not change from original to supplemental LSR.
UR13780.0045	A new field shall be added to the incoming and outbound transactions to support bulk order LSR packages. **BOPI** (Bulk Order Package Identifier) The field shall allow up to 12 A/N characters and will have the same valid characters as the PON field.
UR13780.0045a	If the conditions in Requirement 0045 are not met, the following error message shall be returned to the user The BOPI valid values are upper case alpha a thru z, numeric 0 thru 9, and symbols. , - ‘
UR13780.0045b	Requirement Deleted
UR13780 0045c	Requirement Deleted
UR13780.0046	A new field shall be added to the incoming and outbound transactions to support bulk order LSR packages. **BULK VER** The field shall be 2 numeric characters. The field shall be optional on original bulk orders, with values of blank or 00, and required on Supplemental bulk orders, with values of 01 or greater
UR13780.0046a	Requirement Deleted
UR13780.0046b	If the conditions in Requirement .0046 are not met on a Bulk SUP, the following error message shall be returned to the user: BULK VER must be two numerics-01 or greater for supplemental bulk packages
UR13780.0046c	If the conditions in Requirement 0046 are not met on initial Bulk requests, the following error message shall be returned to the user: BULK VER must be spaces or zeros for initial bulk package
UR13780.0047	If the conditions in Requirement .0046 are not met on a Bulk SUP, the following error message shall be returned to the user. BULK VER required on Supplemental Bulk Order packages
UR13780 0048	Requirement Deleted
UR13780.0049	Requirement Deleted

Requirement No.	User Requirement
UR13780 0050	The initial bulk order LSR package may consist of the following fields, once per account (EATN): PON (Required) VER (Optional) TOS (Optional) DDD (Required) AN (Required) BI1 (Required) BAN1 (Required) BI2 (Conditional) BAN2 (Conditional) ERL (Required) EATN (Required) NAME EU (Required) RESID (Conditional)
UR13780 0060	The bulk order LSR package may consist of the following Line Level fields, once per PORTED TN: LNUM (Required) PORTED TN (Required) CHANPAIR (Conditional) CHANPAIR2 (Conditional) CFA (Conditional) CABLEID (Conditional)
UR13780.0061	If any additional fields other than the fields defined in .0040, 0041 .0050, and 0060 are populated, the solution shall ignore them
UR13780.0062	The above fields, as documented in .0040, .0050, and .0060, for the bulk order package will be validated based on existing rules for REQTYP B, ACT V, LNA V, except where specifically noted within this document.
UR13780 0064	If the REQTYP/ACT combination conditions in Requirement .0020 are not met, the following error message will be returned to the user: For Bulk Order Requests, only REQTYP B, ACT V, LNA V LSRs are applicable.
UR13780.0065	If a bulk package is received without a required field, the following error message shall be returned: &BOPI&&PON (if applicable) &&field name&&current error message&
UR13780.0066	If any of the individual LSRs cannot be created from the bulk package due to error conditions, the entire bulk package shall be rejected. This applies to both initial and supplemental Bulk Packages.
UR13780.0068	The new field "BOPI" with the value of "BULK" appended shall be mapped to the PROJECT field on the individual LSRs.

Requirement No.	User Requirement
UR13780.0069	The PROJECT field value must match when comparing the supplemental LSR, except for a SUP 01 to cancel, to the original bulk ordered LSR.
UR13780.0069a	If the condition in Requirement .0069 is not met, the following error message shall be returned to the user: For Bulk Ordered LSRs, the PROJECT field on Supplemental LSRs must match Initial LSRs
UR13780.0070	Requirement Deleted
UR13780.0075	Requirement Deleted
UR13780.0080	Requirement Deleted
UR13780 0085	Requirement Deleted
UR13780.0090	Requirement Deleted
UR13780 0094	The BI2 and BAN2 fields shall be required when the ERL field = Y, otherwise the fields shall be optional.
UR13780.0095	Requirement Deleted
UR13780.0099	If the conditions in Requirement .0094 are not met, the following error message shall be returned to the user. &BOPI&&PON&BI2 and BAN2 required when ERL = Y on Bulk Order LSRs.
UR13780.0100	Requirement Deleted
UR13780.0103	For LNP applications, REQTYP B global processing, the BI2 and BAN2 fields shall be required when the ERL = Y, otherwise the fields shall be optional
UR13780 0107	If the conditions in Requirement .0103 are not met, the following error message shall be returned to the user: BI2 and BAN2 required when ERL = Y
UR13780.0110	Requirement Deleted
UR13780.0113	The solution shall not allow the BI1 and BI2 fields to be populated with the same data on individually entered Bulk related SUP LSRs.
UR13780.0117	If the condition in Requirement .0113 is met, the following error message shall be returned to the user. BI2 must not equal BI1 on Bulk Ordered LSRs
UR13780.0120	Requirement Deleted
UR13780 0122	The solution shall not allow the BI1 and BI2 fields to be populated with the same data for initial Bulk Package requests.
UR13780.0123	If the condition in Requirement .0122 is met, the following error message shall be returned to the user: &BOPI&&PON&BI2 must not equal BI1 on Bulk Package requests
UR13780.0125	Requirement Deleted
UR13780.0130	Requirement Deleted
UR13780.0132	Requirement Deleted
UR13780.0135	Requirement Deleted
UR13780.0137	Requirement Deleted

Requirement No.	User Requirement
UR13780.0140	Requirement deleted
UR13780.0150	Requirement deleted
UR13780.0160	Requirement deleted
UR13780.0170	The solutions shall compare the first 8 characters of the ACTL with the first 8 characters of the SWC CLLI returned from RSAG for each EATN to ensure all accounts are from same wire center. If any accounts do not match, the solution shall reject the entire package.
UR13780.0175	If the condition in Requirement .0170 is not met, the following error message shall be returned to the user. &BOPI&&PON& Account not found in same serving wire center as Bulk Order ACTL
UR13780.0180	Requirement deleted
UR13780.0190	Requirement deleted
UR13780.0191	Requirement moved to 0587
UR13780.0200	Supplemental requests on original bulk order LSRs shall be accepted on individual LSR basis, as normal processing done today
UR13780.0203	BOPI is required on SUPs issued on LSRs that are part of an original Bulk order package
UR13780.0204	If the condition in Requirement 0203 is not met, the following error message shall be returned to the user BOPI is required on SUPs issued on LSRs that are part of an original Bulk order package.
UR13780 0210	Supplemental Bulk ordering shall be allowed for SUP 01 (cancel). The bulk order SUP request shall apply to all remaining LSRs included in the original bulk order request and the solution shall increment those LSRs VER by 1.
UR13780.0211	Supplemental Bulk ordering for SUP 01 shall consist only of the following fields: CC (Required) SUP (Required) BOPI (Required) BULK VER (Required) D/T SENT. (Required)
UR13780.0211a	If the conditions in Requirement .0211 are not met, the following error message shall be returned to the user. &field name& is required for Bulk Order Supplemental Package
UR13780.0211b	If any additional fields other than the fields defined in .0211 are populated, the solution shall ignore them.
UR13780.0211c	Requirement Deleted
UR13780.0212	SUP 02 (due date changes) and 03 (all other changes) shall be prohibited with bulk order.

Requirement No.	User Requirement
UR13780.0215	If the conditions in Requirement .0212 are not met, the following error message shall be returned to the user. Only SUP 01 allowed on Bulk order REQTYP B requests.
UR13780.0216	If a Bulk Order Supplemental package is received and the original Bulk Order package was not found, the solution shall reject the Supplemental Bulk Order package.
UR13780.0216a	If the conditions in Requirement .0216 are met, the following error message shall be returned to the user. Can not process. Original Bulk Order Package not found.
UR13780.0216b	If a bulk order supplemental package to cancel is received and all of the associated LSRs are either cancelled or completed, the solution shall reject the package.
UR13780.0216c	If the conditions in Requirement .0216b are met, the following error message shall be returned to the user. Can not process. All LSRs in the bulk package are cancelled or completed.
UR13780.0217	Moved to .0211
UR13780.0218	Moved to .0211a
UR13780.0220	All return transactions, i.e., FOCs, CNs, POS, Rejects, Clarifications and Jeopardies shall be sent to the CLECs in individual transactions for each associated EATN submitted via bulk ordering.
UR13780.0222	A new internal only POS transaction for cancelled service orders shall be submitted by the LNP application to the solution for storage and system retrieval This new POS shall not be submitted to the CLEC Users.
UR13780.0225	The fields BOPI and BULK VER shall be added to the map for all return transactions, FOCs, CNs, POS, Rejects, Clarifications and Jeopardies.
UR13780.0230	Requirement Deleted
UR13780.0240	The BOPI is prohibited on initial individually entered LSRs
UR13780.0250	If the conditions in Requirement .0240 are not met, the following error message will be returned to the user: BOPI prohibited on initial individually entered LSRs.
UR13780.0252	The BULK VER is prohibited on any individually entered LSRs.
UR13780.0254	If the conditions in Requirement .0252 are not met, the following error message will be returned to the user: BULK VER prohibited on individually entered LSRs.
UR13780.0260	For all LSRs with BOPI populated, CHC is prohibited.
UR13780.0265	If the conditions in Requirement .0260 are not met, the following error message will be returned to the user. CHC prohibited on Bulk Order LSRs
UR13780 0268	For all LSRs with BOPI populated, DFDT is prohibited.

Requirement No.	User Requirement
UR13780.0270	If the conditions in Requirement .0268 are not met, the following error message will be returned to the user: DFDT prohibited on Bulk Order LSRs
UR13780 0275	For all LSRs with BOPI populated, DNUM is prohibited.
UR13780 0280	Requirement Deleted
UR13780.0285	If the conditions in Requirement .0275 are not met, the following error message will be returned to the user: DNUM prohibited on Bulk Order LSRs
UR13780.0290	Requirement Deleted
UR13780 0300	Requirement Deleted
UR13780 0310	Requirement Deleted
UR13780 0320	Requirement Deleted
UR13780.0330	Requirement Deleted
UR13780.0340	Requirement Deleted
UR13780 0350	Requirement Deleted
UR13780.0500	Requirement deleted
UR13780 0510	Requirement deleted
UR13780 0512	Requirement Deleted
UR13780.0515	Requirement deleted
UR13780.0517	Requirement deleted
UR13780.0520	Manual LSRs (Fax) are not applicable for bulk ordering.
UR13780 0530	For all LSRs with BOPI populated, EUMI of "Y" shall be prohibited.
UR13780.0535	If the conditions in Requirement .0530 are not met, the following error message will be returned to the user: EUMI prohibited on Bulk Order LSRs
UR13780.0536	For all LSRs with BOPI populated, EXP shall be prohibited.
UR13780.0537	If the conditions in Requirement .0536 are not met, the following error message will be returned to the user: EXP Prohibited on Bulk Order LSRs
UR13780.0540	The solution shall accept the bulk order package, break the individual PONs into separate LSRs and populate the remaining **required** LSR fields from the applicable legacy systems prior to sending the individual LSRs downstream to the LNP applications.
UR13780.0550	Requirement deleted
UR13780.0551	For LSRs with the BOPI populated, the class of service on the CSR of each EATN must match Appendix A.
UR13780.0552	If the conditions in Requirement .0551 are not met, the following error message will be returned to the user: Only Port/Loop Combination products can be migrated via Bulk Ordering Process.
UR13780.0560	Requirement Deleted.
UR13780 0570	Requirement Deleted

Requirement No.	User Requirement
UR13780.0580	Requirement moved to .1000
UR13780.0585	Requirement moved to .1010
UR13780.0587	Requirement moved to .1020
UR13780.0587a	LENS users shall be allowed to submit individual SUPs, types 01, 02, and 03, on LENS bulk order originating LSRs
UR13780.0588	The solution shall auto-clarify an individual SUP 01 LSR received on a previously cancelled LSR.
UR13780 0589	If the conditions in Requirement .0588 are met, the following error message will be returned to the user: Cannot SUP a previously cancelled LSR/PON
UR13780.0590	The service order processing shall be the same as REQTYP B today, unless specified otherwise in this document
UR13780 0600	Requirement deleted
UR13780.0601	The solution shall auto-clarify an individual SUP 01 LSR received on a previously completed LSR.
UR13780.0605	If the conditions in Requirement .0601 are met, the following error message will be returned to the user: Invalid SUP, Subscription Version in state that cannot be changed.
UR13780 0610	Requirement Deleted.
UR13780.0620	Requirement Deleted.
UR13780.0630	Requirement Deleted
UR13780.0640	Requirement Deleted
UR13780.0650	Requirement Deleted
UR13780 0660	Requirement Deleted
UR13780.0661	Requirement deleted
UR13780 0662	Requirement deleted
UR13780.0665	The LCSC users shall have the ability, via LENS and LNPGUI, to retrieve a status summary of the bulk order LSRs, regardless of the CLEC interface.
UR13780.0667	The LCSC users shall have the ability, via LENS and LNPGUI, to retrieve the raw data of the bulk order LSRs, regardless of the CLEC interface.
UR13780.0670	The CLEC users, except for EDI users, shall have the ability to retrieve a status summary of the bulk order LSRs, via the interface the CLEC used to submit the bulk order package.
UR13780 0670a	Requirement deleted
UR13780 0670aa	All users, except for EDI users, shall have the ability to submit a raw data query by submitting the BOPI, BULK VER, CC.
UR13780.0670b	The CLEC users, except for EDI users, shall have the ability to retrieve the raw data of the bulk order LSRs, via the interface the CLEC used to submit the bulk order package.

<table>
<tr><th>Requirement No.</th><th>User Requirement</th></tr>
<tr><td>UR13780.0670c</td><td>The CLEC users, except for EDI users, shall have the ability to retrieve a status summary of the individually created LSRs, via the interface the CLEC used to submit the bulk order package.</td></tr>
<tr><td>UR13780.0670z</td><td>All users, except for EDI users, shall have the ability to submit a summary status query by submitting the BOPI and their CC.</td></tr>
<tr><td>UR13780.0671</td><td>All users, except for EDI users, shall have the summary status made up of the following fields
CC, Bulk Order Package Identifier, Bulk VER
PON, Current PON VER, Current PON Status
Current Service Order Numbers, Current Service Order Status</td></tr>
<tr><td>UR13780 0671a</td><td>The PON status shall consist of the following statuses:
<table>
<tr><th>System process</th><th>PON status</th></tr>
<tr><td>LSR clarified, with the system sending a clarification or autoclarification</td><td>Clarified</td></tr>
<tr><td>LSR cancelled, with FOC sent on SUP 01 sent to the CLEC.</td><td>Cancelled</td></tr>
<tr><td>LSR completed, completion notice sent when all service orders completed and all TNs have gone number ported</td><td>Completed</td></tr>
<tr><td>LSR FOC'd, with FOC sent to the CLEC.</td><td>FOC</td></tr>
<tr><td>LSRs have been accepted by the solution, but they have not been processed enough to be clarified or FOC'd.</td><td>Pending</td></tr>
<tr><td>LSR has a Jeopardy notice returned to the CLEC</td><td>Jeopardy</td></tr>
<tr><td>LSR has been rejected to the CLEC.</td><td>Rejected</td></tr>
<tr><td></td><td></td></tr>
</table></td></tr>
<tr><td>UR13780.0672</td><td>The raw data shall consist of the fields identified in Requirements .0040, .0050, 0060, for initial bulk order packages and .0211 for the bulk SUP 01 packages.</td></tr>
<tr><td>UR13780.0674</td><td>The bulk order status summary shall be created only from information returned to the CLEC by the solution.</td></tr>
<tr><td>UR13780.0679</td><td>If the CLEC submits a bulk order status summary query, and the bulk order package is not found, the solution shall return the following message:
Bulk Order Package does not exist in the database</td></tr>
</table>

Requirement No.	User Requirement
UR13780 0680	Requirement Deleted
UR13780 0681	The notification messages associated to a bulk order LSRs and Package will be stored and available for system retrieval.
UR13780.0690	Requirement Deleted
UR13780.0700	Requirement Deleted
UR13780.0710	For global LNP processing, the CENT FID on the current EATN shall be used to determine the class of service and Routing code for the Directory Order.
UR13780 0720	TAG and LNP shall not recalculate the DDD on bulk order LSRs.
UR13780 0730	The DDD provided must be greater than or equal to 14 business days after the current system date of the bulk order package. This value shall be a tunable value for BellSouth. Non business days are defined as weekends and days defined by BellSouth.
UR13780.0740	If the conditions in Requirement .0730 are met, the following error message will be returned to the user: DDD must be greater than or equal to 14 business days after the date the Bulk Order Package is submitted.
UR13780 0743	The DDD provided on type 02 or 03 Supplemental LSRs with the BOPI populated must be greater than or equal to 14 business days after the current system date of the Supplemental LSR. This value shall be a tunable value for BellSouth Non business days are defined as weekends and days defined by BellSouth.
UR13780 0746	If the conditions in Requirement .0743 are met, the following error message will be returned to the user: DDD on bulk ordered Supplemental must be greater than or equal to 14 business days after the date the Supplemental LSR is submitted
UR13780 0750	Requirement deleted
UR13780.0760	Requirement deleted
UR13780.0770	Moved to .1030
UR13780.0780	Moved to 1040
UR13780.0790	Requirement Deleted
UR13780.0800	Requirement Deleted
UR13780.0810	Requirement deleted
UR13780.0815	Requirement deleted
UR13780.0820	Requirement deleted
UR13780.0825	Requirement deleted
UR13780.0826	Requirement deleted
UR13780.0830	Requirement deleted
UR13780.0840	Requirement deleted
UR13780 0850	When a request is made for changes to an LSR via the View LSR process, the solution shall not retrieve the BULK VER field
UR13780 0860	Requirement Deleted

Requirement No.	User Requirement
UR13780.0870	For all original and SUP LSRs with the BOPI populated, the LNP GW will always return a clarification, regardless of the error type, i.e., 1st or 2nd level edits.
UR13780.0880	For Supplemental LSRs with the BOPI populated, Directory Listings shall be prohibited
UR13780.0890	If the conditions in Requirement .0880 are met, the following error message will be returned to the user: Directory Listings prohibited on SUPs of Bulk Ordered LSRs
UR13780.0900	A new outbound reject message for bulk packages shall be used for bulk package rejects and shall consist of the following fields: CC BOPI BULK VER STATUS CODE STATUS MESSAGE ERROR CODE(s) ERROR MESSAGE(s)
UR13780.1000	Requirement Deleted
UR13780.1010	Requirement Deleted
UR13780.1020	Requirement Deleted
UR13780.1030	Requirement Deleted
UR13780.1040	Requirement Deleted

Appendix A

UNE-P USOCS— Defined for UR13780

UNE USOC
UEPBX
UEPRX
UEPCO
UEPVB
UEPVR

BellSouth

UNE to UNE Bulk Ordering Specifications for EDI ELMS 6 Trading Partners

Publication Date: 07/11/03

Notices

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REVISION HISTORY

Version/ Date	Change #	Release#/ Documentation Defect	Description
1 0 07/11/03	CR# **0687**	Release 14 0	Initial Version

Table of Contents

1 Purpose

This document will provide EDI Trading Partners with detailed specifications necessary for submitting an ELMS 6 bulk order for migrating existing Port/Loop Combination services to Loop with Local Number Portability (LNP) services via a comma-delimited file format The Data Transformation Group (DTG) at BellSouth handles current EDI TCIF Issue 9 and ELMS 6 local exchange ordering transactions and will be the interface for EDI Trading Partners wishing to submit UNE to UNE bulk migration orders via this non-standard format.

For information concerning detailed specifications for the submission of TCIF Issue 9 bulk order local exchange ordering transactions, refer to the BellSouth UNE to UNE Bulk Ordering Specifications for EDI TCIF Issue 9 Trading Partners.

The rules and guidelines to be followed for successful electronic exchange of ELMS 6 bulk order documents are contained in this specifications guide.

EDI Trading Partners wishing to submit bulk order files should contact their BellSouth Electronic Commerce account team representative for assistance in setting up the appropriate connectivity parameters.

2 Intended Audience

This document is intended for CLECs and Software Vendors who are current EDI ELMS 6 Trading Partners, ordering local exchange products and services from BellSouth via EDI. Although these specifications are provided to allow current EDI ELMS 6 Trading Partners the ability to submit bulk migration orders, this bulk ordering process does not utilize standard EDI ANSI X12 transaction sets Bulk ordering requires exchange of comma-delimited files as detailed in these specifications

3 How To Use This Guide

This Guide is designed to assist Trading Partners in developing systems that can send and receive ELMS 6 bulk order related documents Section 6 details the records that make up this data trading arrangement.

As with regular Local Service Ordering via EDI, Trading Partners must prepare and exchange electronic order documents that follow both the comma-delimited file specifications stated herein and the BellSouth usage rules as detailed in the BellSouth *Local Ordering Handbook*

4 Assumptions

It is assumed that.

- The CLEC/Software Vendor is a current EDI Trading Partner ordering local services in the ELMS 6 arena
- The CLEC/Software Vendor will use CONNECT Direct® as their method of connectivity, VAN (Value Added Network) connectivity and IA (Interactive Agent) connectivity is not supported for UNE to UNE Bulk Orders Bulk Ordering connectivity must be arranged with BellSouth's DTG group prior to sending orders.
- BellSouth will adhere to a 30-minute Acknowledgment turnaround to Trading Partners upon receipt of a bulk order
- There will be at least a two-minute interval between bulk order files sent via CONNECT Direct® to BellSouth

- The sending party (CLEC/Vendor for initial or supplemental bulk orders; BellSouth for bulk order acknowledgments and reject notices) is responsible for ensuring successful submission of its bulk order data The BellSouth translation jobs are operational 24 x 7, except during normal scheduled maintenance
- BellSouth does not expect an Acknowledgment from the Trading Partner for bulk order Reject messages

5 Bulk Ordering Process

Document flows are described below.

5.1 Initial Orders

- Trading Partner sends initial ELMS 6 bulk order package to DTG (comma-delimited format).
- DTG does initial validation of data, checking for correct trading partner information, record identifiers, etc
  - If invalid data, negative Acknowledgment sent to Trading Partner (comma-delimited format)
    < No further processing
  - If valid data, positive Acknowledgment sent to Trading Partner (comma-delimited format).
    < Processing continues
- DTG forwards bulk package to BellSouth ordering systems for processing.
  - If invalid data, bulk order package reject notice prepared and sent to DTG for transfer to Trading Partner (comma-delimited format)
  - If valid data, bulk order package is "burst" into individual LSRs for processing.
    < Processing continues.
- Response documents (FOCs, POS, CNs, etc) for individual LSRs will be returned to Trading Partners via normal ELMS 6 855/865 transaction sets
  - Trading Partners will respond to 855/865s with 997s, as normal.

5.2 Supplemental Orders (SUP)

- Trading Partner sends supplemental ELMS 6 bulk order to DTG
- DTG does initial validation of data, checking for correct trading partner information, record identifiers, etc.
  - If invalid data, negative Acknowledgment sent to Trading Partner (comma-delimited format).
    < No further processing.
  - If valid data, positive Acknowledgment sent to Trading Partner (comma-delimited format).
    < Processing continues
- DTG forwards supplemental bulk package to BellSouth ordering systems for processing

6 Comma-delimited File Layout

The Order and Response specifications for submitting/receiving the comma-delimited bulk ordering files are described below Because this service is designed for EDI ELMS 6 Trading Partners, data submitted must follow the same data characteristic rules as detailed in the BellSouth EDI Specifications Guide for ANSI ASC X12 Version 4030

A comma-delimited "positional" record layout is used at BellSouth for exchanging bulk order data with its Trading Partners Data in each record is separated by a comma (,) (Note Because the comma is used as the data separator, the inclusion of a comma in actual data will result in an error condition.) A new record is indicated by a BellSouth-specified record identifier Each record is terminated by a carriage return/line feed (HEX 0D0A), which is the default for most recent versions of Microsoft Excel

Files must be transmitted via CONNECT Direct® in binary mode with no translation

6.1 Ordering Specifications

Initial Orders

Each initial bulk order file will consist of four record types

- Bulk Order Envelope Record—once per file
- Bulk Order Package Record—once per file
- Purchase Order Record—multiple times per file
- Purchase Order Line Item Record—multiple times per Purchase Order Record

Supplemental Orders

Each SUP bulk order file will consist of only two record types

- Bulk Order Envelope Record—once per file
- Bulk Order Package Record—once per file

Bulk Order Envelope Record

The first record is the Bulk Order Envelope Record. Each file will contain a Bulk Order Envelope Record

Example:

RECID,TP-SENDER-ID,BS-RECEIVER-ID,TEST-PROD-IND,BULK-GEN-DATE,BULK-GEN–TIME

Field	Description
RECID	For the Bulk Order Envelope Record, the value of **"BOEV"**
TP-SENDER-ID	Trading Partner Sender Identification, provided when establishing connectivity
BS-RECEIVER-ID	BellSouth Receiver Identification, provided when establishing connectivity
TEST-PROD-IND	A "T" or a "P", indicating test or production order
BULK-GEN-DATE	The date the bulk order was sent to BellSouth in CCYYMMDD format
BULK-GEN–TIME	The date the bulk order was sent to BellSouth in HH MM SS format

Bulk Order Package Record

The second record is the Bulk Order Package Record Each file may contain one Bulk Order Package Record.

Example:

RECID,BOPI,BULK VER,SUP,CC,REQTYP,ACT,LNA,TOS,CCNA,ACNA,CIC,NNSP,INIT,INIT-TEL-NO,INIT-FAX-NO,IMPCON, IMPCON-TEL-NO,DSGCON, DSGCON-STREET, DSGCON-CITY, DSGCON-STATE, DSGCON-ZIP-CODE,DSGCON-FLOOR, DSGCON-ROOM-MAIL-STOP,DSGCON-TEL-NO, DSGCON-FAX-NO,NC,NCI,SECNCI,ACTL,DRC,D/T SENT

Field	Description
RECID	For the Bulk Order Package Record, the value of "BOPI"
BOPI	Bulk Order Package Identifier
BULK VER	Bulk Package Version
SUP	Supplemental Type
CC	Company Code
REQTYP	Requisition Type
ACT	Activity Type

Field	Description
LNA	Line Activity
TOS	Type of Service
CCNA	Customer Carrier Name Abbreviation
ACNA	Access Customer Name Abbreviation
CIC	Carrier Identification Code
NNSP	New Network Service Provider Identification
INIT	Initiator Identification
INIT-TEL-NO	Initiator Telephone Number
INIT-FAX-NO	Initiator Fax Number
IMPCON	Implementation Contact
IMPCON-TEL-NO	Implementation Contact Telephone Number
DSGCON	Design/Engineering Contact
DSGCON-STREET	Design/Engineering Contact Street
DSGCON-CITY	Design/Engineering Contact City
DSGCON-STATE	Design/Engineering Contact State
DSGCON-ZIP-CODE	Design/Engineering Contact Zipcode
DSGCON-FLOOR	Design/Engineering Contact Floor
DSGCON-ROOM-MAIL-STOP	Design/Engineering Contact Email
DSGCON-TEL-NO	Design/Engineering Contact Telephone Number
DSGCON-FAX-NO	Design/Engineering Contact Fax Number
NC	Network Channel Code
NCI	Network Channel Interface Code
SECNCI	Secondary Network Channel Interface Code
ACTL	Access Customer Terminal Location
DRC	Design Routing Code
D/T SENT	Date Sent

Purchase Order Record

The third record is the Purchase Order Record For each Bulk Order there may be multiple Purchase Order Records

Example:

RECID,PON,VER,TOS,DDD,AN,BI1,BAN1,BI2,BAN2,ELT,EATN,NAME,RESID,MI

Field	Description
RECID	For the Purchase Order Record, the value of "BOPO"
PON	Purchase Order Number
VER	Version
TOS	Type of Service
DDD	Desired Due Date
AN	Account Number
BI1	Billing Account Number Identifier 1
BAN1	Billing Account Number 1
BI2	Billing Account Number Identifier 2
BAN2	Billing Account Number 2
ELT	End User Listing Treatment
EATN	Existing Account Telephone Number
NAME	Name
RESID	Response Identifier
MI	Migration Indicator

Purchase Order Line Item Record

The fourth record is the Purchase Order Line Item Record. For each Purchase Order Record, there may be multiple Purchase Order Line Item Records.

Example:
RECID,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID

Field	**Description**
RECID	For the Purchase Order Line Item Record, the value of "BOPL"
LNUM	Line Number
PORTED_NBR	Ported Number
CHAN/PAIR	Channel Pair
CHAN/PAIR2	Channel Pair 2
CFA	Connecting Facility Assignment
CABLEID	Cable ID

6.1.1 Example Bulk Order Files

The format of an ***initial*** file is illustrated below

BOEV,TP-SENDER-ID,BS-RECEIVER-ID,TEST-PROD-IND,BULK-GEN-DATE,BULK-GEN–TIME
BOPI,BOPI,BULK VER,,CC,REQTYP,ACT,LNA,TOS,CCNA,ACNA,CIC,NNSP,INIT,INIT-TEL-NO,INIT-FAX-NO,IMPCON,IMPCON-TEL-NO,DSGCON,DSGCON-STREET,DSGCON-CITY,DSGCON-STATE,DSGCON-ZIP-CODE,DSGCON-FLOOR,DSGCON-ROOM-MAIL-STOP,DSGCON-TEL-NO,DSGCON-FAX-NO,NC,NCI,SECNCI,ACTL,DRC,D/T SENT
BOPO,PON,VER,TOS,DDD,AN,BI1,BAN1,BI2,BAN2,ELT,EATN,NAME,RESID,MI
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPO,PON,VER,TOS,DDD,AN,BI1,BAN1,BI2,BAN2,ELT,EATN,NAME,RESID,MI
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPO,PON,VER,TOS,DDD,AN,BI1,BAN1,BI2,BAN2,ELT,EATN,NAME,RESID,MI
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPO,PON,VER,TOS,DDD,AN,BI1,BAN1,BI2,BAN2,ELT,EATN,NAME,RESID,MI
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPO,PON,VER,TOS,DDD,AN,BI1,BAN1,BI2,BAN2,ELT,EATN,NAME,RESID,MI
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPO,PON,VER,TOS,DDD,AN,BI1,BAN1,BI2,BAN2,ELT,EATN,NAME,RESID,MI
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID
BOPL,LNUM,PORTED_NBR,CHAN/PAIR,CHAN/PAIR2,CFA,CABLEID

The format of a ***supplemental*** file is illustrated below:

BOEV,TP-SENDER-ID,BS-RECEIVER-ID,TEST-PROD-IND,BULK-GEN-DATE,BULK-GEN–TIME
BOPI,BOPI,BULK VER,SUP,CC,,D/T SENT

6.2 Response Document Specifications

There are two types of responses a Trading Partner may receive in the ELMS 6 bulk ordering environment:

- **Acknowledgment from DTG**
  Upon receipt of an Initial bulk order or Supplemental bulk order at BellSouth, an Acknowledgment will be returned to the Trading Partner [Note: If an invalid Bulk Order Envelope Record is received at BellSouth, DTG will be unable to respond electronically with an Acknowledgment Minimally, the "BOEV" record identifier, a valid TP-SENDER-ID and the record terminating carriage return/line feed indicator must be part of the first record]

  A *positive* Acknowledgment will be returned if adequate data is received to allow further processing.

  A *negative* Acknowledgment will be returned to the Trading Partner for the following reasons.
  - More than one order is contained in the file
  - Missing or invalid BS-Receiver-ID and/or TP-Sender-ID
  - Missing or invalid "T" or "P" test/production indicator
  - Missing or invalid record identifiers
  - Missing "BOPI" field data
  - Invalid date or time format
  - Invalid record/file format

- **Reject Notice from the BellSouth ordering systems**
  Invalid data will cause error messages to be returned to the Trading Partner.

Both types of responses are returned to the EDI Trading Partner in the same record format. Each response file will consist of three record types:

- Bulk Order Envelope Record—once per file
- Bulk Order Package Record—once per file
- Bulk Order Message Record—multiple times per file

Bulk Order Envelope Record

The first record is the Bulk Order Envelope Record. Each file will contain a Bulk Order Envelope Record [1]

Example:

RECID,TP-SENDER-ID,BS-RECEIVER-ID,TEST-PROD-IND,BULK-GEN-DATE,BULK-GEN–TIME,TRANSACTION-TYPE

Field	Description
RECID	For the Bulk Order Envelope Record, the value of "**BOEV**"
TP-SENDER-ID	Trading Partner Sender Identification, provided when establishing connectivity
BS-RECEIVER-ID	BellSouth Receiver Identification, provided when establishing connectivity
TEST-PROD-IND	A "T" or a "P", indicating test or production order
BULK-GEN-DATE	The date the bulk order was sent to BellSouth in CCYYMMDD format

[1] The Reject Notice from BellSouth ordering systems will not contain the BULK-GEN-DATE and BULK-GEN-TIME

Field	Description
BULK-GEN–TIME	The date the bulk order was sent to BellSouth in HH MM SS format
TRANSACTION-TYPE	"A" for Positive Acknowledgment "N" for Negative Acknowledgment "R" for Reject

Bulk Order Package Record

The second record is the Bulk Order Package Record. Each file will contain a Bulk Order Package Record.

Example:

RECID,BOPI,BULK VER

Field	Description
RECID	For the Bulk Order Package Record, the value of "**BOPI**"
BOPI	Bulk Order Package Identifier
BULK VER	Bulk Package Version

Bulk Order Message Record

The third record is the Bulk Order Message Record Each file will contain a Bulk Order Message Record

Example:

RECID,MESSAGE CODE,MESSAGE

Field	Description
RECID	For the Bulk Order Message Record, the value of "**BOMS**"
MESSAGE CODE	An Acknowledgment, Status, or Error Code
MESSAGE	An Acknowledgment, Status, or Error Message

6.2.1 Example Response Files

The format of a *response* file is illustrated below:

BOEV,TP-SENDER-ID,BS-RECEIVER-ID,TEST-PROD-IND,BULK-GEN-DATE,BULK-GEN–TIME,TRANSACTION-TYPE
BOPI,BOPI,BULK VER
BOMS,MESSAGE CODE,MESSAGE
BOMS,MESSAGE CODE,MESSAGE
BOMS,MESSAGE CODE,MESSAGE
BOMS,MESSAGE CODE,MESSAGE
BOMS,MESSAGE CODE,MESSAGE
BOMS,MESSAGE CODE,MESSAGE

7 Glossary

ANSI	American National Standards Institute
ASC	Accredited Standards Committee
CLEC	Competitive Local Exchange Carrier
CN	Completion Notice
DTG	Data Transformation Group
ELMS 6	EDI Local Service Order Guideline Mechanization Specifications, Version 6
EDI	Electronic Data Interchange
FOC	Firm Order Confirmation
LNP	Local Number Portability
LSR	Local Service Request
POS	Pending Order Status
SUP	Supplemental Order
TCIF Issue 9	Telecommunications Industry Forum, Version 9
Trading Partner	CLEC or Software Vendor exchanging documents with DTG
UNE	Unbundled Network Services
VAN	Value Added Network

UNE to UNE Bulk Migrations

You can now process bulk orders for LSRs that migrate existing port/loop combinations services to Loop w/LNP services (REQTYP B, ACT V, all LNA V). You can also request and receive the status and image of a single REQTYP B LSR or a REQTYP B bulk order

Area of Impact	
State / MSA	All BST States
TOS (Type of Service)	All Applicable
REQTYP	B
ACT / LNA*	ACT= V, LNA = V

Applicable Port/Loop Combination Products

- The bulk order LSRs apply only to migrating existing non-complex Port/Loop Combination services to Loop w/LNP LSRs, REQTYP B, with ACT of V, all LNA of V. If the REQTYP/ACT combination conditions are not met, the message *For Bulk Order Requests, only REQTYP B, ACT V, LNA V LSRs are applicable* will be returned to the user.
- The specific applicable Port/Loop Combination products are listed below. For LSRs with the BOPI populated, the class of service on the CSR of each EATN must match one of these USOCs. If not, the user receives the message *Only Port/Loop Combination products can be migrated via Bulk Ordering Process*

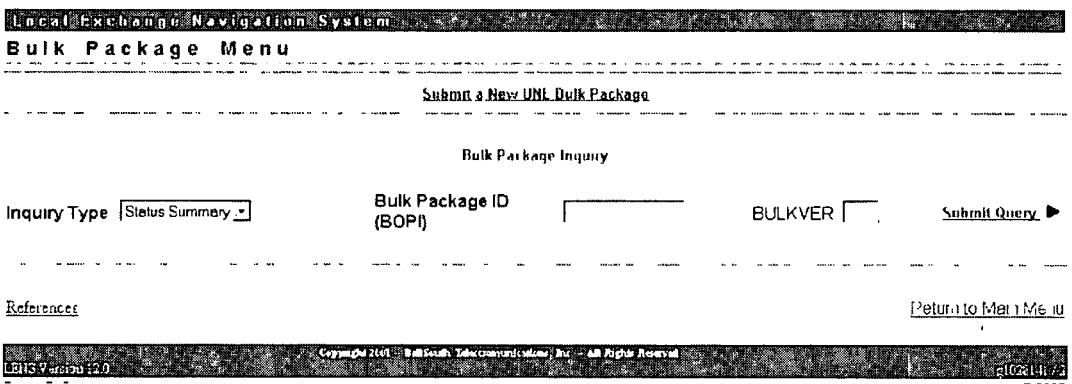
UNE USOC			
UEPAA	UEPBC	UEPWA	UEPWB
UEPAB	UEPBL	UEPA1	UEPWD
UEPAC	UEPBM	UEPA8	UEPWP
UEPAD		UEPA9	UEPWF
UEPAE	UEPBO	UEPWC	UEPWH
UEPAF	UEPRC	UEPWQ	UEPBA
UEPAG	UEPRL	UEPWR	UEPWK
UEPAH		UEPWE	UEPWM
UEPAJ	UEPRM	UEPWG	UEPBB
UEPAK	UEPRO	UEPRQ	UEPWO
UEPAL		UEPWJ	UEPB2
UEPAM		UEPWL	UEPB3
UEPAN		UEPRS	UEPBE
UEPAO		UEPWN	
UEPAP		UEPRR	
UEPB1		UEPRT	

Submitting Bulk Orders Manually

To submit bulk orders manually, follow the steps below

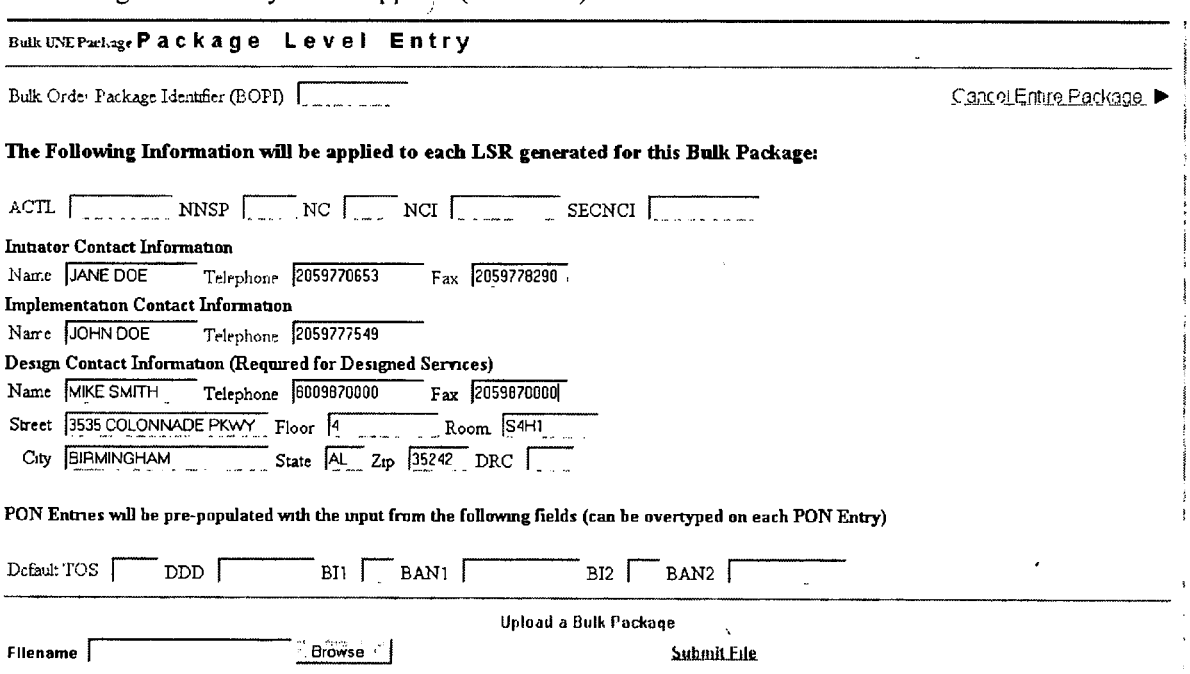
1. From the Main menu, click **Bulk UNE Packages**

   The Bulk Package Menu screen appears (see below)



2 Click **Submit a New UNE Bulk Package**

   The Package Level Entry screen appears (see below)



3. Enter the following information. It will be applied to each LSR generated for this bulk package

Field	Description
Bulk Order Package Identifier (BOPI)	Required • This field allows up to 12 A/N characters and has the same valid characters as the PON field If the conditions are not met, the following error message is displayed. *The BOPI valid values are upper case alpha a thru z, numeric 0 thru 9, and symbols, - '* • When *BULK* is appended to this field, it is mapped to the *Project* field on the individual LSRs
ACTL	Required The first 8 characters of the ACTL must match the first 8 characters of the SWC CLLI to ensure all accounts are from same wire center If any accounts do not match, the entire package is rejected with the message *<BOPI> & <PON> & Account not found in same serving wire center as Bulk Order ACTL*
NNSP	Optional
NC	Required
NCI	Conditional Enter if required
SECNCI	Conditional Enter if required.

4 Enter the following Initiator Contact Information

Field	Description
Name	Required
Telephone	Required
Fax	Required

5 Enter the following Implementation Contact Information

Field	Description
Name	Required
Telephone	Required

6 If the bulk order package is for designed services, enter the following Design Contact Information

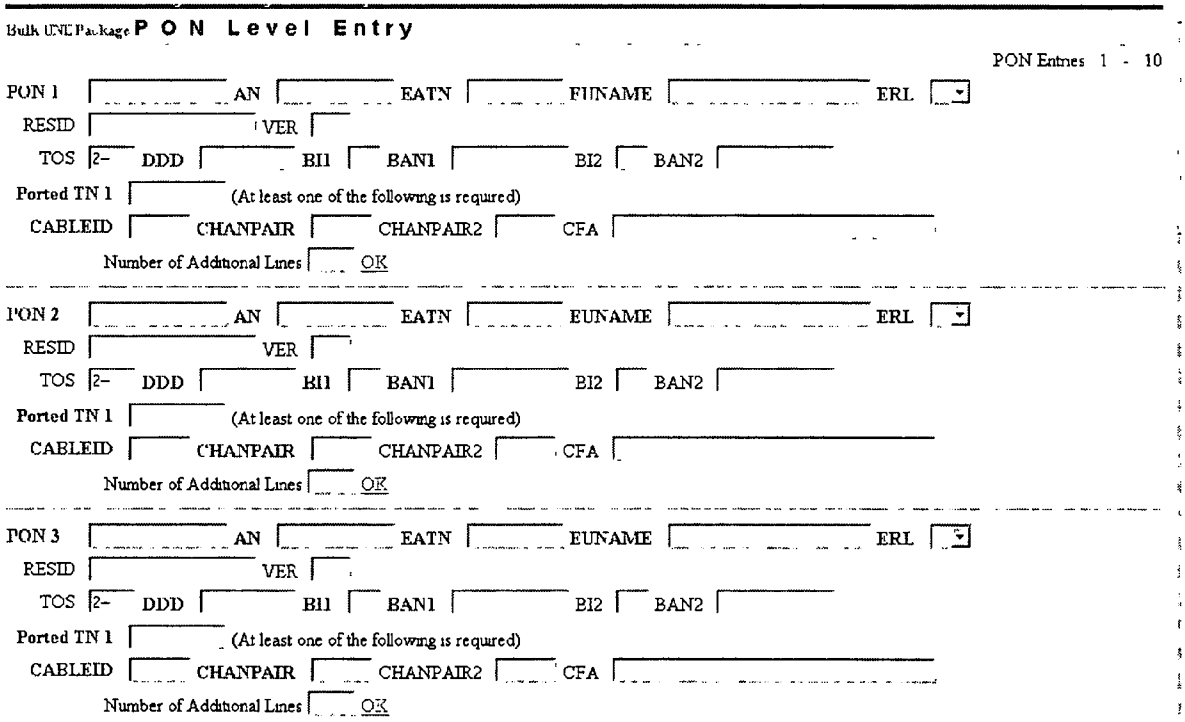
Field	Description
Name	Enter if required
Telephone	Enter if required
Fax	Optional
Street	Enter if required
Floor	Enter if required
Room	Optional
City	Enter if required
State	Optional
Zip	Optional
DRC	Optional

7 Enter the following fields if you want them pre-populated on the bulk order PONs See Step 9 for field descriptions

- Default TOS
- DDD
- BI1
- BAN1
- BI2
- BAN2

8. Click **Continue**

The PON Level Entry screen appears (see below)



9 Enter the following fields for each account (EATN)

Note The bulk order LSR package must consist of a minimum of 2 and up to and including 100 EATNs Otherwise, the message *Bulk Order Package must be a minimum of 2 and up to and including 100 EATNs* is returned to the user

Field	Description
PONx	Required
AN	Required
EATN	Required
EUNAME	Required
ERL	Required Valid values are *A* or *B*
RESID	Conditional. Enter if required
VER	Optional on original bulk orders with values of blank or 00 If the conditions are not met on initial Bulk requests, the message *BULK VER must be spaces or zeros for initial bulk package* is returned to the user •
TOS	Optional
DDD	Required The DDD provided must be greater than or equal to 14 business days after the current system date of the bulk order package If not, the following error message will be returned to the user *DDD must be greater than or equal to 14 business days after the date the Bulk Order Package is submitted*
BI1	Required

Field	Description
BAN1	Required
BI2	• Required when the ERL field = Y, otherwise the fields is optional If not met, the user receives the message *<BOPI> <PON> <BI2> and BAN2 required when ERL = Y on Bulk Order LSRs.* • For LNP applications, REQTYP B global processing, the BI2 and BAN2 fields are required when the ERL = Y, otherwise the fields are optional. If the conditions are not met, the following error message is returned to the user *BI2 and BAN2 required when ERL = Y*
BAN2	• Required when the ERL field = Y, otherwise the fields is optional If not met, the user receives the message *<BOPI> <PON> <BI2> and BAN2 required when ERL = Y on Bulk Order LSRs.* • For LNP applications, REQTYP B global processing, the BI2 and BAN2 fields are required when the ERL = Y, otherwise the fields are optional. If the conditions are not met, the following error message is returned to the user *BI2 and BAN2 required when ERL = Y*

10 Enter the following fields for each ported TN if required

Field	Description
LNUM	
PORTED TN 1	
CHANPAIR	Conditional
CHANPAIR2	Conditional
CFA	Conditional
CABLEID	Conditional

11 Enter the following additional fields if required

Field	Description
Appointment Code	Enter *L* for Bulk Ordered LSRs
NPT	Enter *D* for Bulk Ordered LSRs

12 If you are entering more than 10 orders, click **Next** to display a new page

13. When you have completed the final order, click **Submit Package**

Uploading Bulk Order Files

If you do not want to type each bulk order manually, you can upload them in a file. See the sections that follow for details

Creating a UNE-to-UNE Bulk Package File

Follow the steps below to create a bulk package file.

1. Open Microsoft Excel
2. Create a row for each Ported TN (Line) using the rules below:
   - For a PON with multiple Lines, the first row (LNUM=1) should contain the PON, Line Details and PON Level Information for this PON The rows for the additional Lines should contain only the PON, LNUM (=2, 3, 4, etc) and Line Details (Ported TN and either cable designation or CFA) An error will be generated if the PON Level Information (PON VER, EATN, Name EU, RESID, TOS, etc.) are populated on the rows for additional Lines for a PON
   - LNUM is optional for a PON with a single Line
   - The Default Values provided on the LENS upload page will be applied for each PON unless the corresponding field is populated For example, the DDD populated on the LENS upload page will be used to populate the DDD for each PON unless a DDD is provided for a PON in this file DDD must be populated on each PON in this file unless a Default DDD is provided via the LENS upload page
   - EATN, Name EU and ERL are required for each PON Ported TN is required on each row in this file Either CFA or a Chan/Pair and Cable ID combination is required on each row in this file depending upon the NC/NCI/SECNCI value(s) provided on the LENS upload page
3. Save the file as a Tab delimited text file (txt) for upload
4. Save the file also (Save As) in Microsoft Excel format so that future modifications can be made easily

Uploading a UNE-to-UNE Bulk Package File

Follow the steps below to upload a bulk package file

1 From the Bulk Package Menu, click **Submit a new UNE Bulk Package**

2 Type the name and location of your file in the *Filename* field (for example, c \orders\bulkorders\order7 txt)
OR
Click **Browse** to retrieve the file from your computer or company network. When the File Open dialog box appears, highlight the file and click Open. The file name will be populated in the *Filename* field

3. Click **Submit File**

If all required fields are complete, an Acknowledgement is given indicating that the order was successfully completed and submitted to BellSouth.

FOCs, NCs, POS, Rejects, Clarifications, and Jeopardies

- All return transactions (FOCs, CNs, POS, Rejects, Clarifications and Jeopardies) will be sent to the CLECs in individual transactions for each associated EATN submitted via bulk ordering.
- The fields BOPI and BULK VER are displayed on all return transactions.
- If any of the individual LSRs cannot be created from the bulk package due to error conditions, the entire bulk package will be rejected. This applies to both initial and supplemental Bulk Packages.
- A new outbound reject message for bulk packages will be used for bulk package rejects and will consist of the following fields

CC
BOPI
BULK VER
STATUS CODE
STATUS MESSAGE
ERROR CODE(s)
ERROR MESSAGE

PON Status

The PON status consists of the following statuses

System Process	PON Status
LSR clarified, with the system sending a clarification or autoclarification	Clarified
LSR cancelled, with FOC sent on SUP 01 sent to the CLEC	Cancelled
LSR completed, completion notice sent when all service orders completed and all TNs gone number ported	Completed
LSR FOC'd, with FOC sent to the CLEC	FOC
LSRs have been accepted, but they have not been processed enough to be clarified or FOC'd	Pending

Supplements

- SUP
  For initial bulk order LSR packages, SUP is prohibited. The error message *SUP prohibited on initial Bulk Order Package* will be returned to the user.
- BOPI (Bulk Order Package Identifier)
  BOPI is required on SUPs issued on LSRs that are part of an original Bulk order package If not populated, the message *BOPI is required on SUPs issued on LSRs that are part of an original Bulk order package* will be returned to the user.
- BULK VER
  Required on Supplemental bulk orders, with values of 01 or greater If condition not met on a Bulk SUP, the messages *BULK VER must be two numerics-01 or greater for supplemental bulk packages*
  and
  BULK VER required on Supplemental Bulk Order packages are returned to the user.
  - PROJECT
    The Project field value must match when comparing the supplemental LSR (except for a SUP 01 to cancel) to the original bulk ordered LSR Otherwise, the message *For Bulk Ordered LSRs, the PROJECT field on Supplemental LSRs must match Initial LSRs* is returned to the user.
- ORIGINAL BULK ORDER PACKAGE NOT FOUND
  If a Bulk Order Supplemental package is received and the original Bulk Order package is not found, the Supplemental Bulk Order package will be rejected and the message *Cannot process Original Bulk Order Package not found* is returned to the user.
- DIRECTORY LISTINGS
  For Supplemental LSRs with the BOPI populated, Directory Listings is prohibited. If populated, the following error message will be returned to the user: *Directory Listings prohibited on SUPs of Bulk Ordered LSRs*

SUP 01

- Supplemental Bulk ordering is allowed for SUP 01 (cancel). The bulk order SUP request applies to all remaining LSRs included in the original bulk order request and the LSRs VERs are incremented by 1.
- SUP01 Bulk Order Fields
  Supplemental Bulk ordering for SUP 01 consists of the following fields only. If the required values are not supplied, the message *<field name> is required for Bulk Order Supplemental Package*

Field	Description
CC	Required
SUP	Required
BOPI	Required
BULK VER	Required
D/T SENT.	Required

- If a bulk order supplemental package to cancel is received and all of the associated LSRs are either cancelled or completed, the package will be rejected and the message *Can not process All LSRs in the bulk package are cancelled or completed* will be returned to the user.

SUP 02 and SUP 03

- SUP 02 (due date changes) and 03 (all other changes) are prohibited with bulk order. If attempted, the user receives the message *Only SUP 01 allowed on Bulk order REQTYP B requests.*
- DESIRED DUE DATE
  The DDD provided on type 02 or 03 Supplemental LSRs with the BOPI populated must be greater than or equal to 14 business days after the current system date of the Supplemental LSR. If not, the following error message will be returned to the user· *DDD on bulk ordered Supplemental must be greater than or equal to 14 business days after the date the Supplemental LSR is submitted*

Individual SUPS

- LENS users can submit individual SUPs, types 01, 02, and 03, on LENS bulk order originating LSRs.
- An individual SUP 01 LSR received on a previously cancelled LSR will be auto-clarified. The user will receive the message *Cannot SUP a previously cancelled LSR/PON.*
- An individual SUP 01 LSR received on a previously completed LSR will be auto-clarified. The user will receive the message *Invalid SUP, Subscription Version in state that cannot be changed.*
- ERL
  If the ERL field is different on the individually submitted Supplemental 03 LSRs

when compared to the original bulk ordered LSR, the Supplemental will be auto-clarified. The error message *<Field Name> cannot change from original to supplemental LSR* will be returned to the user.

- FIELD NAMES
  If any of the bulk order fields, with the exception of Bulk Ver, D/T Sent, or DRC, are different on the individually submitted Supplemental 02 and 03 LSRs when compared to the original LSR, the Supplemental will be auto-clarified. The error message *<Field Name> cannot change from original to supplemental LSR* will be returned to the user.

Manual LSRs

Manual LSRs (Fax) are not applicable for bulk ordering

Performing Bulk Order Inquiries

LENS allows you to perform the following bulk order inquiries

- Status Summary
- Raw Data

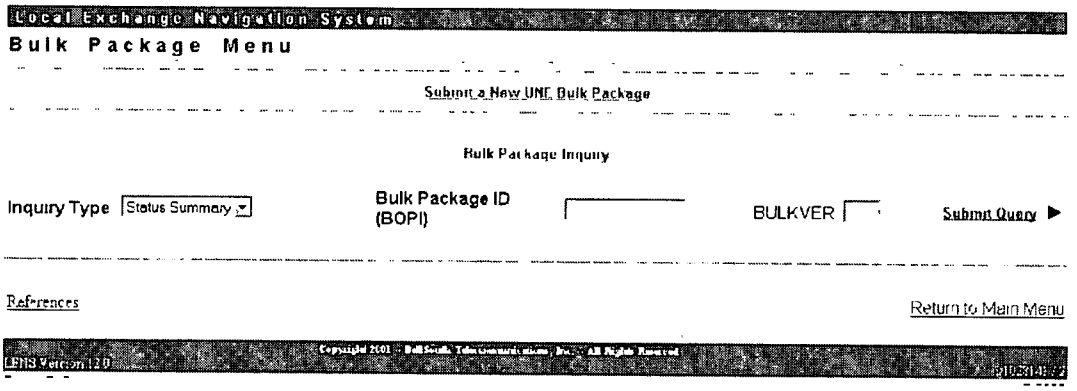
See the sections that follow for details

Bulk Order Status Summary

To retrieve a bulk order status summary, follow the steps below

1 From the Main menu, click **Bulk UNE Packages**

The Bulk Package Menu screen appears (see below).



2 Select **Status Summary** from the *Inquiry Type* pull down menu.

3 Enter the Bulk Package ID in the *Bulk Package ID (BOPI)* field

4. Click **Submit Query**

The following fields are displayed (see below)

Summary Status Fields
CC
Bulk Order Package Identifier
Bulk VER
PON
Current PON VER
Current PON Status
Current Service Order Numbers
Current Service Order Status

If a bulk order status summary query is submitted and the bulk order package is not found, you receive the message *Bulk Order Package has either been rejected or does not exist in the database*

Raw Data Summary

To retrieve a raw data summary, follow the steps below

1. Display the Bulk Package Menu
2 Select **Raw Data** from the *Inquiry Type* pull down menu.
3 Enter the Bulk Package ID in the *Bulk Package ID (BOPI)* field and the version in the *Bulkver* field
4 Click **Submit Query**

   Package level and PON level entry pages will be displayed with the data you entered when you created your bulk order package

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF GARY TENNYSON

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 03-00526

MARCH 12, 2004

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

A. My name is Gary Tennyson. My business address is 1884 Data Drive, Birmingham, AL 35244. My title is Principal Member – Technical Staff. I am employed by BellSouth Telecommunications, Inc

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I have a Bachelor of Science degree in Electrical Engineering from Mississippi State University and a Masters of Science degree in Electrical Engineering from the University of Alabama at Birmingham.

I have been employed in the telecommunications industry for more than 27 years, all with BellSouth, and one of its predecessors, South Central Bell. From 1976 through 1984, I held line and staff positions in Outside Plant Engineering, where I was responsible for the planning and engineering of local loop facilities From 1984 through 1987, I held a staff position in Marketing. Since 1987, I have

been involved with representing BellSouth in various industry standards forums dealing with loop access and associated technical interfaces. During this time, I served a four-year term as the chair of T1E1.1, a Working Group of T1E1, an Industry Standards forum. This Working Group dealt with Analog Interfaces. Currently in BellSouth, I provide expertise on local loop transport issues, particularly in the area of Digital Subscriber Line ("DSL").

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC SERVICE COMMISSION, AND IF SO, BRIEFLY DESCRIBE THE SUBJECT OF YOUR TESTIMONY?

A. Yes. I have testified before the Georgia Public Service Commission on the capabilities of the hot cut process, the Electronic Loop Provisioning ("ELP") process, and technical capabilities of loop unbundling.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED TODAY?

A. I respond to portions of the direct testimonies of Mr James D. Webber on behalf of MCI, and Mr. Mark David Van de Water on behalf of AT&T with regard to Competitive Local Exchange Carriers' ("CLECs"') proposal to mechanize the hot cut process.

Electronic Loop Provisioning

Q. AT&T ADVOCATES THE ELECTRONIC LOOP PROVISIONING ("ELP") PROCESS (VAN DE WATER, AT PAGE 39 OF HIS TESTIMONY). WHAT IS THIS PROCESS AND IS IT A VIABLE OPTION FOR THE TENNESSEE REGULATORY AUTHORITY ("AUTHORITY") TO CONSIDER?

A. In 2002, I participated in a meeting with AT&T Regulatory representatives at which the ELP concept was discussed in full. The ELP process is as follows: Where subscribers are served via copper loop facilities, i.e , no Digital Loop Carrier ("DLC") equipment is employed, ELP provides for the conversion of the analog voice grade signal to a digital format. When DLC is involved, the conversion is already done. After this conversion from analog to digital, the ELP concept provides for 'packetizing' the digital signal into Asynchronous Transfer Mode ("ATM") cells (Note that despite AT&T's claims to the contrary, this packetization is not performed in any DLC systems used in BellSouth today). The ATM cells then transit an ATM switch. At the ATM switch, the ATM 'address' in the header of each cell is examined. Based on that destination address, the cell is then switched to the interface corresponding to the Incumbent Local Exchange Carrier ("ILEC") or CLEC serving that subscriber. Finally, a 'de-packetizing' device is positioned between the ATM switch and each LEC's switching system, to convert the digital signal in the ATM cells back into the synchronous Time-Division-Multiplexed ("TDM") format necessary for interconnection to the switching system.

Since all carriers would be connected to the ATM switch, the manual hot cut process could be replaced with a set of commands, hence the term 'Electronic Loop Provisioning.' Note that this process would require that every loop be connected to an ATM switch, and BellSouth does not have the quantity of ATM switches in its network today to accommodate ELP.

Q. IS DEPLOYING ELP A REASONABLE OR JUSTIFIED PROPOSAL?

A. No. As I will explain throughout my testimony, AT&T's ELP process cannot be justified for either technical or economic reasons First, as other BellSouth witnesses explain, the existing manual hot cut process is reliable. Second, ELP cannot be justified based on its huge cost. The hot cut costs incurred by the incumbent and passed onto the CLEC that would be avoided with ELP is only a one-time cost of $13 per loop transferred versus a recurring monthly charge of $6.66 on all lines. In other words, BellSouth would need to charge an additional $6.66 per loop per month forever to both its retail and wholesale customers. It would cost BellSouth approximately $8 billion in capital expenditures to implement ELP in its network – a cost that would ultimately need to be borne by consumers through higher rates or special surcharges. Third, ELP is not the best architecture to enable DSL and would impede DSL innovation.

Q HOW MUCH WOULD IT COST TO DEPLOY ELP?

A. The ELP cost estimate for copper loops is $339 per line; for DLC loops it is $299 per line Based on the makeup of copper and DLC in BellSouth's region (roughly

60% of all loops are all-copper and 40% are on DLC), the melded cost per line is $323. To realize the stated goal of transferring the end user from the incumbents switch to a CLEC's switch via a 'software command', **all loops** must be modified to an ELP architecture. The estimated cost to implement ELP is approximately $8 billion region-wide. In addition, this strands about $1.6 billion in analog line equipment for BellSouth and provides no improvement in DSL availability.

Q. HOW LONG WOULD IT TAKE TO DEPLOY ELP IN BELLSOUTH'S REGION?

A. It would take at least several years, given the magnitude of such an undertaking and given that each and every loop in BellSouth's region will need to be modified.

Q. DOES THE EQUIPMENT NECESSARY FOR ELP ALREADY RESIDE IN BELLSOUTH'S NETWORK AS THE CLECS' ALLEGE?

A. The CLECs' allegations are overly simplistic and therefore incorrect. BellSouth does not have any of the DLC equipment that ELP requires. Moreover, even though BellSouth has some limited ATM switching capability, BellSouth does not have the quantity of switches, or the switch capacity, necessary to deploy ELP. Finally, BellSouth does not have the voice gateways — needed to connect ATM to the voice switches — in the necessary capacity, or quantity.

Automated MDF and GR-303

Q. ON PAGE 21 OF HIS TESTIMONY, MR. WEBBER DISCUSSES TWO

TECHNOLOGIES THAT CAN BE USED TO CUTOVER A LOOP WITHOUT MANUAL INTERVENTION. PLEASE DESCRIBE THESE TECHNOLOGIES

A. The two technologies are automated frame systems, and electronic loop provisioning via GR-303. I will first describe automated frame systems, and then I will describe electronic loop provisioning via GR-303.

Regarding automated frame systems, Mr Webber would have BellSouth replace the functionality of its Main Distributing Frames ("MDFs"). Some vendors are beginning to sell automated cross-connect devices that employ a physical, electrical connection It is important to distinguish these from the 'digital cross-connect' devices that are prevalent in the network today, and from the ATM switch employed in the AT&T ELP proposal These new automated cross-connect devices provide for an electrical connection. They do not, therefore, require that the input signal conform to some defined format, e.g., DS-1, DS-3, etc, as do 'digital cross-connect' devices. They also do not require that the signal be in an ATM format, as does the ELP proposal. Importantly, BellSouth is not aware of any manufacturer that offers a device of sufficient scale to replace large MDFs Thus, today this solution is not technically available.

The issues surrounding the use of automated frame technology are scalability and feasibility. Let me explain. Consider a hypothetical situation involving a small Central Office ("CO") with only a thousand lines. If we assume that practically all of the loops would connect directly to the switch ports, then such an automated cross-connect may be economically feasible. In such an instance, the

cross-connect device could be built with a thousand loop-side connections, a thousand switch-side connections, and could be built to be capable of cross-connecting any loop to any switch port. In fact, there are devices on the market today that have some limited capability in this regard, and BellSouth is looking at deploying such products in very small COs.

Problems arise when something other than a simple loop to switch port connection is required. For example, when it becomes necessary to connect a loop to something other than a switch, such as a Digital Subscriber Line Access Multiplexer ("DSLAM"), the 'switching matrix' becomes much more complex In larger COs, the size and complexity of the 'switching matrix' makes such products financially impractical BellSouth is not aware of any implementation offering more than sixteen thousand (16,000) terminations, combined loop-side and switch-side. Another constraint, of course, would be the requirement to accommodate a number of interfaces to the various CLECs offering service in a given central office Given that each carrier (including both the incumbent and the CLECs) would need some capacity above and beyond that currently used, the capacity would be considerably less the eight thousand (8,000) lines as suggested above. In summary, the technology is simply not capable of operating at the scale needed to address the need.

Q. PLEASE DESCRIBE THE OTHER TECHNOLOGY, MENTIONED BY MR. WEBBER ON PAGE 21 OF THIS TESTIMONY, THAT COULD BE USED TO CUTOVER A LOOP WITHOUT MANUAL INTERVENTION.

A. The other technology mentioned by Mr. Webber is electronic loop provisioning via GR-303-compliant equipment. This is impractical for several reasons

First, only a small percentage of Integrated Digital Loop Carrier ("IDLC") systems, in Tennessee and elsewhere in BellSouth, are Next Generation Digital Loop Carrier ("NGDLC") systems, capable of employing GR-303 Interface Groups. Second, wherever these systems do exist, there is a limit on the number of GR-303 Interface Groups that can be accommodated. BellSouth has deployed two (2) different types of NGDLC systems. In one type, the limit is one (1) Interface Group. For this type system, no CLEC could have its own dedicated Interface Group since only one (1) exists In the other type, the limit is four (4) Interface Groups meaning that only three (3) CLECs could have their own dedicated Interface Group Third, this option would require extensive Operation Support Systems ("OSS") development to manage each dedicated Interface Group.

To summarize, all of BellSouth's DLC (which comprises only about 40% of its network) is not NGDLC. Second, even where BellSouth has NGDLC, there are not sufficient facilities to serve all CLECs. Finally, even if BellSouth spent the money to replace its network with NGDLC, OSS would need to be developed.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF ALPHONSO J. VARNER

BEFORE THE TENNESSEE REGULATORY AUTHORITY

FILED MARCH 12, 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. ARE YOU THE SAME ALPHONSO J. VARNER WHO FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes I am.

Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A My Rebuttal Testimony addresses various performance related issues raised by the AT&T witness Mark David Van De Water and MCI witness Sherry Lichtenberg.

Q. ALL PARTIES HAVE DIRECTED THE AUTHORITY TO VARIOUS PORTIONS OF THE TRO AND THE RULES IN SUPPORT OF THEIR POSITIONS IN THEIR DIRECT TESTIMONY. WHAT IS THE IMPACT OF THE D.C. CIRCUIT COURT OF APPEALS ORDER ON THE TRO IN THIS PROCEEDING?

A Currently the impact of the DC Circuit Court's opinion is unclear. At the time of filing this testimony, the DC Court had vacated large portions of the rules promulgated as a result of the TRO, but stayed the effective date of the opinion for at least sixty days. Therefore my understanding is that the TRO remains intact for now, but its content, and the rules adopted thereto, must be suspect in light of the court's harsh condemnation of large portions of the order. Accordingly, I will reserve judgment, and the right to supplement my testimony as circumstances dictate, with regard to the ultimate impact of the DC Court's order on this case

Q. WOULD YOU COMMENT ON THE DIFFERENCE BETWEEN MS. LICHTENBERG'S TESTIMONY IN THE MASS MARKET SWITCHING DOCKET NO. 03-00491 AND THIS HOT CUT PROCEEDING?

A. Yes. Ms. Lichtenberg's testimony is basically identical in both of these dockets My rebuttal testimony in the Mass Market Switching Docket responded to the hot cut issues included in that docket but I will not duplicate the effort for the mass market switching issues again in this proceeding. Please refer to my rebuttal testimony filed in Mass Market

Switching Docket No. 03-00491 on February 27, 2004 for my response to all of the switching issues included in Ms. Lichtenberg's hot cut testimony.

Q. ON PAGE 25, MS. LICHTENTBERG ALLEGES THAT BECAUSE BELLSOUTH'S HOT CUT PROCESS IS MANUAL, IT "OFTEN RESULT[S] IN ERRORS AND DELAYS." DOES THE DATA SUPPORT HER POSITION?

A. No. Ms. Lichtenberg's uncorroborated position is directly contrary to the actual data. As discussed in my Direct Hot Cut Testimony, pages 11 & 12, looking at the three primary hot cut measurements in Tennessee (Coordinated Customer Conversions, Hot Cut Timeliness, and Provisioning Troubles within 7 days of Cutover), BellSouth achieved the established standard on 95% of the sub-metrics over the 11-month period provided (December 2002 to October 2003). Clearly, in light of these data results, Ms. Lichtenberg's comments are unsubstantiated and should be given no weight in this proceeding.

Q. ON PAGES 6 AND 7, MR. VAN DE WATER ALLEGES "SUBSTANDARD PERFORMANCE IN RETURNING TIMELY FIRM ORDER CONFIRMATIONS", AND OTHER FAILURES RELATED TO THE SCHEDULING OF HOT CUTS AND "ERRONEOUS DISCONNECTION OF END USERS' LINES", AND "UNDUE DELAY IN RECONNECTION." DO THESE ALLEGATIONS HAVE ANY MERIT?

A. No. Much of Mr. Van De Water's assertions are conjecture or distortions of the facts. Although Mr. De Water provides little or no specifics to support his conclusions, I will attempt to respond to these issues in order. Where Mr. Van De Water alleges that there are delays in returning Firm Order Confirmations, the facts tell a completely different story. As noted on page 15 of my Direct Testimony in Docket No. 03-00491 filed January 16, 2004, for the period December 2002 through October 2003, at least 94% of the LSRs for UNE Loop Orders (which include hot cuts orders) received a Firm Order Confirmation (FOC) within the intervals established by this Commission. For AT&T alone, for the period June through October 2003, 97% of AT&T's Loop LSRs received a FOC within the established intervals. Moreover, the average FOC interval for AT&T's Loop LSRs was 1 2 hours for June through October 2003. This average was for all LSRs including those processed electronically (where the Commission standard is 3 hours) and those processed manually, where the Commission standard ranges from 10 hours (partially mechanized) to 24 hours (non mechanized).

In response to Mr. Van De Water's belief that BellSouth has not provided a 'reliable schedule for performing hot cuts' this belief is, once again, not supported by the facts Referring to paragraph 10, Exhibit AJV-HC1, of my Direct Testimony, for the period December 2002 through October 2003, 99.54% of the scheduled Hot Cuts (2,355 of 2,366 lines) were started within 15 minutes of the requested time on the order. In stark contrast to Mr. Van De Water's allegation, this is conclusive evidence of

BellSouth's superb performance in reliable scheduling.

Mr. Van De Water states that BellSouth fails to notify "consistently and timely that customer loops had been transferred to AT&T." Once again, the facts illustrate that Mr Van De Water's comments are misleading. Referring to my Direct Testimony in Docket No. 03-00491 filed January 16, 2004, page 20, BellSouth achieved the performance standard for the Average Completion Notice Interval for 99% (117 of 118) of the sub-metrics (which include hot cut orders) over the 11-month period, from December 2002 through October 2003.

Lastly on page 7, Mr. Van De Water theorizes that BellSouth creates "customer service outages by erroneous disconnection of end users' lines and, when erroneous disconnections occur, there is undue delay in reconnection." While BellSouth's data does not directly provide the number of customer outages caused specifically by erroneous disconnection of end user's lines, outages caused by erroneous disconnection of end user's lines, should this actually occur, would be reflected in several measurements As an example, the Customer Trouble Report Rate captures all troubles and it includes service outages as well as troubles that do not put a customer out of service. As noted on page 26 of my Direct Testimony in Docket No. 03-00491 filed January 16, 2004, for the period December 2002 through October 2003, UNE Loops experienced at least 98% trouble free service. (Troubles related to Hot Cuts would be in this category) In the event Mr. Van De Water is alleging

that the 'erroneous disconnects' occur as the customer's line is being cut over from BellSouth retail to the CLEC, those troubles would be captured in Trouble Report Rate for BellSouth Retail, mostly in Residence or Business. For the period December 2002 through October 2003, the trouble free rate for these retail lines was 98%. For AT&T, BellSouth's performance has been even more exemplary. For the period June through October 2003, AT&T's lines were in excess of 99% trouble free. In summary, the facts do not support Mr. Van De Water's implication that there are significant "erroneous disconnections."

As to Mr Van De Water's opinion that there is "undue delay in reconnection," once again, the facts portray a completely different picture The time required to clear a trouble report is reflected in the Maintenance Average Duration metric for all services, and, where a trouble is encountered during a hot cut, the time required to clear the trouble is also reported in the measurement Coordinated Customer Conversions – Average Recovery Time. It is important to note that these two measurements reflect the time to clear troubles, many of which are not service outages, but simply problems that do not put the end user completely out of service For the first measurement, Maintenance Average Duration, BellSouth achieved the Commission's performance standard of parity 98% of the time during the 11-month period, December 2002 through October 2003. Moreover, the average time to clear the trouble for all UNE loops (2W Analog Loops, ISDN and XDSL) was 7 hours for this 11-month period. As noted above, the trouble free rate for

AT&T exceeded 99% for the period June through October 2003. This meant that less than 1% of AT&T's loops experienced a trouble report. The average time to clear these few troubles was slightly over 5 4 hours.

For the second measurement, Coordinated Customer Conversions – Average Recovery Time, the average time to clear a trouble experienced before the hot cut was completed, was 7 1 hours for the eleven-month period of December 2002 through October 2003. However, this average time to clear a trouble affected only 1% of the hot cuts for this time period.

Q. MR. VAN DE WATER, ON PAGE 11 LINES 21 – 24, OF HIS TESTIMONY, SUGGESTS THAT THERE ARE CURRENTLY FAILURE AND RESTORATION PROBLEMS AT LOW VOLUMES THAT WILL "ONLY BE EXACERBATED" BASED ON POTENTIAL INCREASED DEMAND FOR UNE-L IF UNE-P IS NO LONGER AVAILABLE. PLEASE ADDRESS HIS COMMENT

A. First, Mr. Van De Water begins, incorrectly, with the premise that there are currently "failure and service restoration problems that occur at low volumes." This premise is belied by the significant amount of data provided with my Direct Testimony in this case and in Docket No. 03-00491 filed January 16, 2004, demonstrating that BellSouth's performance in the ordering, provisioning and maintenance & repair of UNE Loops is more than sufficient to allow CLECs to compete in the local market. Second, Mr. Van De Water uses an incorrect characterization of current

performance to speculate that an increase in UNE-L orders, based on the elimination of local circuit switching as a UNE, exacerbates a current problem, which really is not a problem at all. As with many of his other generalizations and forecasts of doom, Mr. Van De Water provides no facts to support his theory that performance will decline as volume increases, which is contrary to the historical pattern where BellSouth's performance for CLECs has improved as the level of competition has increased over the years.

Q. IN ADOPTING THE PERFORMANCE MEASUREMENTS STANDARDS FOR UNE-L THAT ARE CURRENTLY IN EFFECT, DID THE AUTHORITY LIMIT THE APPROPRIATENESS OF THE STANDARDS THAT IT ESTABLISHED TO SMALL VOLUMES?

A. No, the Authoritymade no such limitation. When the Authority adopted the Florida PSC's standards for UNE-L measures in the performance measurements proceedings, it did so based on its deliberations to determine reasonable performance objectives for BellSouth's service to large and small CLECs, without regard to volumes. Simply said, the Authority did not consider any type of "sliding-scale" of performance standards based on volume

The important point to be made here is that the Authority has already set standards for UNE-L measurements that it considers to be appropriate, and if BellSouth fails to meet these standards it is subject to penalty

payments. BellSouth has demonstrated a consistent record of meeting appropriate standards and has every incentive to continue this record in adjusting to the anticipated increases in UNE-L volumes.

Q. MR. VAN DE WATER, ON PAGE 28 LINES 15 – 16, OF HIS TESTIMONY, STATES, "BELLSOUTH PROVIDES NO PERFORMANCE DATA ON THE FREQUENCY AND DURATION OF FALL-OUT FROM ITS PROVISIONING SYSTEMS." HOW DO YOU RESPOND?

A. It is not clear what Mr. Van De Water means by 'fall-out from provisioning systems.' If he means order processing that requires manual handling, we actually do provide information on the frequency and duration in a number of Ordering measurements reports – namely Flow-Through Service Requests, Partially Mechanized Rejected Service Requests and Partially Mechanized Firm Order Confirmations (FOCs). If, on the other hand, he is referring to what happens after a FOC is issued and service order processing begins, that is a combination of manual and automated processes and both can occur for UNE-P and UNE-L, as well as retail. The proportion of each is not relevant What is relevant is whether BellSouth is providing CLECs with a level of service that allows the CLEC a meaningful opportunity to compete. Both the Authority and the FCC reached that conclusion and the performance data show that there is no basis for concluding otherwise today.

Q. ON PAGE 34 LINES 21 – 22, MR. VAN DE WATER STATES THAT

"BATCH CUT AND OTHER ASSOCIATED LOOP PERFORMANCE STANDARDS SHOULD BE EQUIVALENT TO PERFORMANCE TO MIGRATING A CUSTOMER FROM RETAIL TO UNE-P." IS THIS A LOGICAL BASIS FOR THE PERFORMANCE STANDARD FOR BATCH HOT CUTS?

A No Batch cutovers to UNE-L require some amount of work, over and above that required to migrate an existing customer from retail to UNE-P. Thus, it is unreasonable to base performance standards for batch cutovers on UNE-P migrations. Mr. Ainsworth will address this issue in more detail.

Q. ALSO ON PAGE 34 LINES 23 – 31, MR. VAN DE WATER LISTS SEVERAL KEY PERFORMANCE MEASUREMENT FACTORS FOR BATCH CUTS THAT MUST BE IN PLACE. DO YOU AGREE?

A Yes. In Section II of my Direct Testimony I proposed additional metrics, revisions in business rules and standards associated with batch hot cuts. These revisions address the issues noted by Mr. Van De Water.

Q MR. VAN DE WATER SUGGESTS THAT: 1) SELF EXECUTING FINANCIAL CONSEQUENCES SHOULD BE IN PLACE FOR ILEC FAILURES TO MEET PERFORMANCE STANDARDS (PAGE 34 LINES 32-33); 2) THAT FOR ALL CONVERSION SERVICE OUTAGES, THE CONSEQUENCES SHOULD BE COMMENSURATE WITH THE AVERAGE NET REVENUE TIME OVER THE AVERAGE LIFE OF THE

CUSTOMER (PAGE 34 LINES 33-35). DO YOU AGREE WITH THESE TWO STATEMENTS?

A. The first statement is moot because the SEEM plan in effect in Tennessee meets this requirement. BellSouth's existing measurements associated with cutovers have self-executing financial consequences for the key ordering, provisioning and maintenance and repair metrics. These measurements include

-Percent Flow Through Service Requests
-Reject Interval
-Firm Order Confirmation Timeliness
-Firm Order Confirmation and Reject Response Completeness
-Percent Missed Installation Appointments
-Order Completion Interval
-Percent Provisioning Troubles within 30 days of a Service Order
-Coordinated Customer Conversions Interval
-Coordinated Customer Conversions – Hot Cut Timeliness
-Hot Cut Conversions - % Provisioning Troubles with 7 days
-Service Order Accuracy
-Missed Repair Appointments
-Maintenance Average Duration
-Customer Trouble Report Rate
-Percent Repeat Troubles within 30 days

In addition to these existing measurements in the SEEM plan, BellSouth is proposing a new measure, P-7E, Non-Coordinated Customer Conversions

- % Completed and Notified on Due Date, that will be included in the enforcement plan pending approval by the Commission.

As to Mr. Van De Water's second statement -- that "[f]or all conversion service outages, the consequences should be commensurate with the average net revenue time the average life of the customer." This is an absurd position for AT&T to take. Earlier in my Rebuttal Testimony, I noted that 1% of the hot cuts experienced a trouble report or service outage When these outages occur during a hot cut conversion, they are usually resolved in a matter of hours As mentioned above, the average outage for the 11-month period of December 2002 through October 2003 was slightly more than 7 1 hours. For Mr. Van De Water to suggest that an outage of a few hours for a small percentage of the hot cuts(1%) should somehow be compensated by average revenue for the life of the customer goes beyond the realm of reason.

Furthermore, such a payment in compensatory damages must assume that the customer is lost to the CLEC forever due solely to being out of service for a portion of a day. If the customer decides to leave AT&T forever following an outage related to a hot cut, the root cause is most likely something other than a partial day's outage. Turning the issue raised by Mr. Van De Water around, if he assumes that outages are the sole reason for a customer leaving AT&T, would he further assume that customer retention after a trouble free hot cut is the sole reason for a customer staying? And would he suggest that BellSouth should be

rewarded with the average net revenue for the life of that customer? Probably not.

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 my direct 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 these enhancements affect the measurements, BellSouth will, of course, modify its proposed measurement changes and additions accordingly

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes