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			the CLECs and BellSouth, and provides a "BST New Proposal for this paragraph." It is not the purpose of this filing to create new issues. The language BellSouth now seeks to replace was not addressed by BellSouth in its February 15th filing, or any of the workshops held during March, April or May, or even included in BellSouth's first specific update to this filing delivered to the CLECs on 6/24/02. As a matter of procedure The Commission should refuse to consider this particular language. To the extent the Commission does consider this proposal, the CLECs offer the following comments. First, the language BellSouth is seeking to change has been the CCP definition for defects since inception of the process. Second, the entire purpose of the existing language is specifically to include the conditions BellSouth cites in its "new proposal" within the scope of defects. BellSouth "new proposal" has no merit and is clearly an attempt by BellSouth to take advantage of the Commission's participation in resolving these changes to the CCP. **Defect Correction Intervals (page 26)** BellSouth's recommended alternative language here calls for the correction of medium impact defects in 45 business days (or next available maintenance release) and low impact defects in 60 business days. Further, in a third update to its green-line language delivered to the CLECs on July 1, 2002, BellSouth stated that its 45 and 60 day	days is a reasonable amount of time to correct a defect that has an acceptable workaround. This interval allows consideration of the defect priority to other features that may be in development and vying for resources and enables the defect to be implemented within the release schedule presented to the CCP members. It also would allow BellSouth to meet the CLECs' request that Type 6 defects be corrected in maintenance releases whenever possible thereby not affecting the production releases and their corresponding capacity. Maintenance Releases are normally scheduled any month that a production or industry release is not scheduled, and establishing a forty-five (45) business day interval should allow BellSouth to accommodate the CLECs' request. With respect to "low impact" software defects, which are defined as failures causing inconvenience or annoyance, the current timeframe for correcting is "best effort." Because "low impact" software defects have no immediate adverse impact to the users, correcting such defects does not and should not take a high priority in implementation, particularly when compared to other Change Requests. Nevertheless, BellSouth is willing to commit to correcting "low impact" software defects within sixty (60) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Sixty (60) business days is a reasonable amount of time to correct a defect that does not detrimentally affect performance or stability or otherwise adversely impact a CLEC. BellSouth has proposed these reduced intervals in order to address the CLECs' request that software defects be corrected in a shorter period

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			offers were contingent upon acceptance of its new proposed definition discussed immediately above. The CLEC's propose 20 business days and 30 business days respectively for these same intervals. BellSouth's selection of 45 days and 60 days is totally arbitrary and unacceptable. Until it forwarded its second update to its green-line language to the CLECs on 6/28/02 BellSouth's position was that the appropriate intervals were 90 and 120 days. While the reduction in intervals appears significant it is inadequate based upon the facts of BellSouth's capabilities and the needs of the CLECs. It is not necessary (or desirable) to wait for a release in order to implement a defect correction. BellSouth has repeatedly implemented defect corrections outside any formal release. For example, most recently, BellSouth corrected 12 of 17 software defects arising from the implementation of Release 10.5 on various dates between 6/3/02 and 6/16/02. At least five of these were classified as medium impact. Thus the CLEC's 20 business day interval for medium impact defects is obtainable and reasonable and any requirement to wait for a release unnecessary. BellSouth's performance in its voluntary correction of the majority of the "low impact" defects associated with the implementation of Parsed Customer Service Records within 24 calendar days demonstrates that the CLECs' proposed 30 business day interval is also obtainable and reasonable. [See also the CLEC Coalition Comments being separately submitted for a description of recommended changes to the metrics associated	of time. BellSouth can only accommodate this request if the definition of a Type 6 Change Request is clarified to include only true software defects, as BellSouth has proposed in Item No. 8a. Absent this clarification, errors in documenting functionality are considered a Type 6 Change Request, which requires work analogous to adding a new feature to fix and which cannot be accomplished in a shorter amount of time.

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			with the timely implementation of defect corrections.]	
10	4.0 – Part 1 – Step 2 Outputs	O 32	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision. The trial process is working well. It is anticipated that a workshop to resolve this and other issues will be held in the near future.	This issue is still under discussion by BellSouth and the CLECs.
11	4.0 – Part 2 – Step 4, Act #5 (BCCM)	D 39	For the CCP to be a joint forward looking proactive process, all parties to the process must have the same detailed information available to them about the elements of the process to be managed and coordinated. In the case of the CCP the principle elements being managed and coordinated are (1) the change requests and (2) the programming resources available, assigned and expended. The contrasts between the CLEC and BellSouth's proposed language here and in several of the associated items discussed below are prime examples of the key differences between the CLEC's and BellSouth's overall positions on the sharing of this vital information. This includes information related to the individual change request sizing as they progress through the process, and information about the programming resources required, forecast, available, assigned and expended as the process operates to implement the requests in current and future releases. The CLECs propose the on-going sharing of information at each step in the process where the information is likely to change such asprioritization, release package development, release management and implementation, and post implementation. The CLEC's proposal requests that at these points data be provided in the same groupings of	BellSouth is committed to providing complete and timely information to assist the CLECs in their prioritization efforts and agrees with much of the CLECs' proposed language. The CLECs earlier this year agreed to a process (contained in Appendix H) by which BellSouth provides the feature sizing for the Type 4 and Type 5 Change Requests that are candidates for prioritization. Once the CLECs have prioritized the features, BellSouth provides a 12-month view of features scheduled, implemented or planned. This is commonly called the Flagship Feature Release Schedule and is discussed in each CCP Monthly Status Meeting. Although BellSouth is agreeable to most of the CLECs' proposed language, BellSouth cannot agree to the language that purports to require BellSouth to provide feature sizing for "all future releases." Such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Since the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a yearly view of features, as proposed by BellSouth, which includes "known" future releases, is a reasonable alternative. The parties also disagree about the specific feature sizing information that should be provided. The CLECs appendix I-A suggests that there is a set amount of capacity for each category they list by release. This is not the case. Production

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			categories to allow for tracking and the early detection of potential problems. Appendix I (to which the parties have agreed) providespost implementation data in distinct categories. The CLECs propose Appendix 1-A (See Item 48 below and page 117 of the Updated CCP Document) for the reporting of Pre-Release Capacity Forecast information and changes during the process steps using the same categories as in Appendix I. With this constancy in the reporting of the basic process data the effectiveness of the process can be analyzed and improvement plans developed. In contrast, BellSouth's proposed language limits providing sizing information to only certain types of change requests, and only at a single point in the process (prioritization). Further it limits the sharing of information on releases to an annual snapshot in a format and grouping inconsistent with Appendix I making both in progress evaluation of the process and post implementation evaluations impossible (See Item 48 below and page 118 of the Updated CCP Document). BellSouth's proposal excludes the CLECs from access to information about the process as changes occur which is vital to the CLECs internal resource planning. The CLECs are requesting "information on each pending change request" and "all future releases" and that Appendix I-A, which is consistent with Appendix I, be used as the basic structure for release capacity forecast information. BellSouth is willing to provide information only on "Type 4 and Type 5 change requests", and estimated release capacity information only "annually" and only for releases planned for "the following year"	Releases, whether a CLEC or BellSouth Production Release, can have Types 2, 4, 5, or 6 Change Requests. In the case of the Type 4s and 5s, they are optional and entirely dependent upon whether it is a CLEC or BellSouth Production Release. In either case, during a "Pre-Release" point in time, these releases are open to any and all types as mentioned. Listing Units by category, as the CLECs' proposed Appendix I-A would require BellSouth do so, erroneously presumes that BellSouth knows how much capacity each release, by category of Type Change Request, would have before prioritization and release planning by the CLECs. Although BellSouth could arbitrarily designate release capacity by category, there is no logical basis for doing so. As an alternative, BellSouth offers Appendix I-B, which provides pre-release capacity information, expressed in units, and provides the intelligence for the CLECs to determine the pre-release capacity available. It also allows the flexibility and reality of how the Change Request types correspond to release types. For example, Type 6s and PSN mandates are predominantly targeted for maintenance releases, while Types 2s, 4s, and 5s are targeted for production releases in accordance with the BellSouth and CLEC Production Release guidelines. Lastly, Type 3s are targeted for the Industry Release. The information that BellSouth proposes to provide to the CLECs to assist in the prioritization effort, as outlined in Appendix I-B, is reasonable and should be adopted.

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			using Appendix I-B, which is inconsistent with Appendix I. Limiting the information being provided makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	
12	4.0 – Part 2 – Step 4 – Note after Act #3 (CCCM)	D 39	In the agreed upon portion of this note BellSouth confirms that the information associated with each change request may change after prioritization. The CLECs request is for the changes to be communicated to them. BellSouth's response is that the limited information it proposes to provide (as discussed in Item 11 above) will not be updated when changes occur.	BellSouth has proposed language to make clear that the release information BellSouth will provide to assist the CLECs in their prioritization efforts relate to Type 4 and Type 5 Change Requests, which are the only Change Requests that CLECs prioritize.
13	4.0 – Part 2 – Step 4 - Inputs	D 40	The CLECs request that an input to this step should be the information discussed in detail above in Item 11.	This issue in dispute is related to Item No. 11 and concerns detailing the information that BellSouth provides to CLECs in connection with feature prioritization. BellSouth's proposed language is specific and detailed so there is no confusion about what information BellSouth will be providing. The same cannot be said about the CLECs' proposed language, which merely refers to providing "full release capacity."
14	4.0 – Part 2 – Step 4 - Outputs	D 40	The CLECs request that an output from this step should be any changes to the input information that occurs as a result of the process discussed above in Item 13.	This issue in dispute is related to Item No. 11 and concerns the information that BellSouth provides to CLECs in connection with feature prioritization. Consistent with the process to which the CLECs agreed earlier this year, once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, with a 12-month view of features scheduled, implemented or planned.

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				BellSouth cannot agree to the CLECs' proposed language that purports to require BellSouth to provide feature sizing for "all future releases." Such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Since the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a yearly view of features, as proposed by BellSouth, which includes "known" future releases, is a reasonable alternative.
15	4.0 – Part 2 – Step 5 – Prioritization Meeting	D 40	Once again BellSouth creates an issue that did not previously exist. In its first update of its "green-line" language submitted to the CLECs on 6/24/02, BellSouth added the restrictive language shown here. The timing of prioritization meetings was not previously in dispute between the CLECs and BellSouth. It is not the purpose of this filing to create new issues. The language BellSouth now seeks to amend was not addressed by BellSouth in its February 15th filing, or any of the workshops held during March, April or May. As a matter of procedure The Commission should refuse to consider this particular language. To the extent that the Commission does consider it, the CLECs offer the following comments regarding the proposed restrictions. First, the language BellSouth is seeking to change has been the official schedule for prioritization under the CCP since inception of the process. Second, prioritization is not limited to change requests associated with only CLEC Production Releases, BellSouth's language here would eliminate the prioritization of BellSouth initiated	BellSouth has proposed language to clarify that a prioritization meeting should only be held when applicable.

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			change requests. Third, the regular prioritization of new change requests in essential to their timely implementation and should be the driver of the establishment of new releases rather than being "Dependent on whether a CLEC Production Release is available for prioritization." This is another example of BellSouth's exclusionary and reactive view of the CCP. BellSouth's restrictions have no merit and are clearly an attempt by BellSouth to take advantage of the Commission's participation in resolving these changes to the CCP	
16	4.0 – Part 2 – Step 5, Act #3	D 41	The CLECs request at this step of the process is the same as discussed above in Item 11 for the exchange of forward looking information over a planning horizon of two years for all pending change requests and the releases necessary for their timely implementation. Once again BellSouth's response, limits the information it proposes to share to only Type-4 and Type-5 change requests and a 12 month period. Limiting the information being provided makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	BellSouth's proposed language concerning the information that will be provided in connection with the CLEC prioritization effort is consistent with the process to which the CLECs agreed earlier this year. BellSouth's proposed language also makes clear that the information BellSouth will provide to assist the CLECs in their prioritization efforts relate to Type 4 and Type 5 Change Requests, which are the only Change Requests that CLECs prioritize.
17	4.0 – Part 2 – Step 5, Act #6	D 41	In this portion of the process the CLEC's proposal results in the preparation of a jointly prioritized plan for the timely implementation of all pending change requests using the required number of unified production releases (releases containing all types of changes – regulatory, defect, BellSouth initiated and CLEC initiated). Unified releases maximize the efficient utilization of BellSouth's programming resources. Given that the prioritization and order of	BellSouth's proposed language details the approach that should be taken in scheduling the changes for the releases. The CLEC language does not take into account necessary maintenance that is required for efficiency and stabilization, acknowledgement of infrastructure upgrades, nor does it provide flexibility in utilizing the maintenance releases as the primary source for defect correction. Fundamentally, BellSouth's proposed language details how it can "dedicate capacity"

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			implementation under the CLEC's proposal is jointly determined, it is logical that any changes thereafter should be jointly determined and, therefore require CLEC concurrence. In contrast, BellSouth proposes a concept it copied from the change control plan of another ILEC – separate BellSouth and CLEC Production Releases. BellSouth proposes this work effort would only apply to "the CLEC Production Release being scoped". Further, even within the confines of a CLEC Production Release BellSouth refuses to seek CLEC concurrence to changes, committing only to "provide rationale" should it decide to restructure the implementation order. The CLECs are proposing an open, single, unified process for the timely implementation of all change requests regardless of their origin based upon a jointly established prioritization. BellSouth's proposal, in contrast, establishes separate tracks for CLEC initiated changes and BellSouth initiated changes, excludes the CLECs from any participation in the BellSouth track, excludes the CLECs from participation in vital portions of the process in the CLEC track, and reserves to BellSouth the right to implement changes that have not been subjected to the process. This separate track concept is wasteful of the BellSouth programming resources to the detriment of all. Throughout the updated BellSouth green-line language, there are references to how BellSouth will manage the CLEC production releases, but not one mention of how it will manage the so-called BellSouth production releases. BellSouth states that its concept provides "parity" - "Estimated capacity for production releases is equal." However, there is no evidence to	to the CLECs in order to implement those changes important to them and enable BellSouth to continue with necessary changes to enable it to operate efficiently, which also benefits the CLECs.

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			suggest that a blind equal allocation of capacity has any validity. An analysis of the year 2003 capacity information that BellSouth made available beginning on May 10, 2002, reveals that it is not. In 2003, BellSouth's blind allocation has provided BellSouth with capacity beyond its needs. Regarding potential releases in 2003, BellSouth has provided the CLECs with information on two options. In Option A there would be 2 CLEC production releases, 3 BellSouth production releases and 5 maintenance releases using approximately 3,000 units. In Option B there would be 1 CLEC production release, 2 BellSouth production releases, 5 maintenance releases, and an industry standard release, again using approximately 3,000 units. In each option one of the BellSouth Production Releases was dedicated to an Infrastructure Upgrade, but the capacity required for that release in each option was different as was the capacity needed for maintenance releases. When questioned during the May 22, 2002 Change Control Status and Prioritization Meeting whether the units in Option B for the Infrastructure Release and Maintenance Releases were adequate BellSouth stated that the objectives of the releases could be met with only these units. Thus the information reveals that in Option A BellSouth reserved to itself more capacity than was necessary for the Infrastructure Production Release (105 units) and Maintenance Releases (158), a total of 263 units, about 15 man years work effort. It is clear under both Option A and Option B that BellSouth has manipulated the process to allocate 50% of the non-industry standard and non-maintenance capacity to itself and 50% to the CLEC	

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			production releases. This arbitrary allocation has no basis and will impede the timely implementation of all change requests. Individual sizing information for change requests to be prioritized during the May 22, 2002 meeting was provided to the CLECs on May 15. On May 23rd BellSouth provided the results of the prioritization and a total of units for 24 of the 26 changes prioritized. The total was 817 units. An additional 998 units of capacity have been estimated as necessary for the implementation of Type-2 requests from the Flow Through Task Force ("FTTF") in 2003. None of the change requests prioritized on May 22, 2003 can be implemented in 2002 according to BellSouth. Of the 26 requests prioritized, 8 were initiated by BellSouth and, there are currently no other pending BellSouth change requests, nor will there be any other unimplemented BellSouth change requests at year end 2002. The 8 BellSouth initiated change requests require only an estimated 156 capacity units. Despite this fact, under Option B BellSouth has reserved to itself 314 units over and above the Infrastructure Release requirements and in Option A it had reserved 837 units. The establishment of separate releases for 2003 is clearly wasteful of resources and has a negative impact on the timely implementation of the highest priority changes irregardless of their origin, including even the implementation of changes to the infrastructure designed to ensure and improve the stability and performance requirements.	
18	4.0 – Part 2 – Step 5 - Inputs	D 42	The CLECs request that an input to this step should be any changes to the sizing and capacity information that occur as a result of the	This issue in dispute is related to Item No. 11 and concerns the information that BellSouth provides to CLECs in connection with

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			process discussed above in Item 14.	feature prioritization. Consistent with the process to which the CLECs agreed earlier this year, once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, with a 12-month view of features scheduled, implemented or planned. BellSouth cannot agree to the CLECs' proposed language that purports to require BellSouth to provide feature sizing for "all future releases," since such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Because the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a yearly view of features, as proposed by BellSouth, which includes "known" future releases, is a reasonable alternative.
19	4.0 – Part 2 – Step 5 - Outputs	D 42	The CLECs request that an output from this step should be publication and commitment to the results of the work discussed above in Item 17.	This issue in dispute is the same as Item Nos. 11, 14, and 18, which are addressed above.
20	4.0 – Part 2 – Step 6 - Inputs	D 42	The CLECs request that an output from this step should be publication and commitment to the results of the work discussed above in Item 17.	This issue in dispute is the same as Item Nos. 11, 14, and 18, which are addressed above.
21	4.0 – Part 2 – Step 7 - DCCoM	D 42	The CLECs are providing a header to identify the inclusion of the Designated CLEC Co-Moderator (DCCoM) function (discussed above in Item 2 and below in Item 23) in this step of the process. Under BellSouth's current policies and under its proposed new language the CLECs are specifically excluded from participation in this step and have no objective representation.	This issue in dispute is related to Item No. 2 and concerns the CLECs' request to participate in internal BellSouth meetings. BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively. The definition of a "CLEC affecting" change has been expanded so as to increase the scope of the CCP, and BellSouth will use the CCP membership Forum for discussing, prioritizing and

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				obtaining final approval for the CLEC Production Releases, as well as for providing the changes in BellSouth Production Releases. CLECs can participate fully in the Change Control Process without participating in internal BellSouth meetings, which would hamper BellSouth's ability to run its business.
22	4.0 – Part 2 – Step 7, Act #2	D 43	BellSouth's statement is that "This step is not necessary since BellSouth will implement CLEC requested features in CLEC Production Releases as guided by the CLEC's prioritization." totally misses the point of the CLEC's proposal for unified releases. Furthermore, BellSouth's position reveals its determination to exclude CLECs from vital steps in the process and reserve to itself complete independence to implement or not implement any given change on a schedule of its own choosing. As was discovered by KPMG and reported in Florida Third Party Test Exception 88, BellSouth is the only entity that has input to and considers changes at Step 7 of the process that have not been submitted to the CCP as change requests for prioritization. See Item 1 above for the full details of the CLECs' support for their proposed language.	The issue in dispute is related to Item No. 1, and concerns the CLECs' proposal that BellSouth comply with the CCP, although only as it relates to Type 5 (BellSouth-initiated) Change Requests. BellSouth's proposed language would require adherence to the CCP for all Change Requests (not just Type 5s), but would clarify that BellSouth will implement CLEC-requested features in CLEC Production Releases as guided by the CLECs' prioritization. If for any reason the order of implementation requested by the CLECs cannot be met (e.g., technical constraints), BellSouth will provide the rationale. All Type 2, 4, 5 and 6 Change Requests, regardless of whether implemented in a CLEC or BellSouth Production Release will be communicated to the CCP membership, although BellSouth's Production Releases would not be subject to CLEC approval, as the CLECs' proposed language seeks to do.
23	4.0 – Part 2 – Step 7, Act #3	D 43	The establishment of the DCCoM function will enhance BellSouth's process and the coordination with the CLEC's parallel internal processes essential to the timely and effective implementation of prioritized changes. See Item 2 above for the full details of the CLECs' support for their	This issue in dispute is related to Item Nos. 2 and 21 and concerns the CLECs' request to participate in internal BellSouth meetings. For the reasons previously explained, BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively.

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			proposed language.	
24	4.0 – Part 2 – Step 7, Act #4 1st Paragraph	D 43	In this portion of the process, the CLEC's proposal takes the results of the jointly prioritized plan for the timely implementation of all pending change requests developed per the discussion in Item 17 above to determine and schedule the required number of unified production releases (releases containing all types of changes – regulatory, defect, BellSouth initiated and CLEC initiated). Unified releases maximize the efficient utilization of BellSouth's programming resources. BellSouth's proposed modifications exclude CLECs from the process and restrict the scope of the planning process to be reactive rather than proactive. This makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	This issue in dispute is related to Item No. 4 and concerns the CLECs' proposed language which would require that BellSouth commit unlimited resource capacity to meet an infinite (yet undetermined) amount of demand (i.e., number of CLEC-initiated change requests) merely upon the request of CLECs to implement these features. There are hundreds of CLECs that potentially could make requests for new features. The defined process does not limit the number of CLECs who participate in CCP nor does it limit the number of change request any CLEC may request of BellSouth. No company has unlimited resources, and no ILEC, to BellSouth's knowledge, is subject to a Change Control Process by which CLECs determine the level of OSS investment that the incumbent must make. BellSouth has developed a comprehensive prioritization proposal by which: (i) BellSouth provides the estimated sizes for all features requested for prioritization along with the estimated amount of capacity available for the releases; and (ii) CLECs and BellSouth share equally available release capacity (after all scheduled defects are corrected, all regulatory mandates are implemented, and all needed updated industry standards are built). Under BellSouth's proposal, CLECs have the necessary tools to make an informed decision to prioritize features and determine which should be deployed first, second, etc., and can be assured that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs, and subject to available capacity. BellSouth's comprehensive prioritization proposal is reasonable and has been endorsed by both KPMG and the Staff of the Florida Public Service

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				Commission. Consistent with that proposal, BellSouth recommends keeping the current language in this paragraph and adding the phrase "CLEC Production Release" to clarify which release is involved.
25	4.0 - Part 2 - Step 7, Act #4 2nd Paragraph	D 43	As discussed in Item 17 above, given that the prioritization and order of implementation under the CLEC's proposal is jointly determined, it is logical that any changes thereafter should be jointly determined and therefore require CLEC concurrence. A detailed discussion contrasting the impacts of unified versus separate release tracks and, highlighting the negative impacts of BellSouth's separate track proposal can be found in Item 17 above.	BellSouth's suggested language details the approach that should be taken in scheduling the changes for the releases. The CLEC language does not take into account necessary maintenance that is required for efficiency and stabilization, acknowledgement of infrastructure upgrades, nor does it enable flexibility in utilizing the maintenance releases as the primary source for defect correction. Fundamentally, BellSouth has detailed how it can "dedicate capacity" to the CLECs in order to implement those changes important to them and enable BellSouth to continue with the necessary changes to enable it to operate efficiently.
26	4.0 – Part 2 – Step 7, Act #5	D 43	There are two related but separate issues at this CCP section reference. First, the establishment of a 60 week interval for the implementation of feature change requests. Second, the use of joint prioritization to establish unified releases. **60 Week Interval** A major stated and published objective of the CCP is "Timely and effective implementation of feature and defect change requests." However, the existing CCP contains no intervals or guidelines for the actual implementation of feature change requests (Type-4 and Type-5 Change Requests, and undated Type-2s). See Item 4 above for the full details of the CLECs' support for their proposed language. **Joint Prioritization / Unified Releases**	The issue in dispute is related to Item Nos. 4, 7, and 24 and concerns the CLECs' request that BellSouth devote unlimited release capacity to implementing every Change Request within 60 weeks of prioritization, which, for the reasons previously explained, BellSouth is unable to do. BellSouth has developed a comprehensive prioritization process that gives the CLECs the necessary tools to make an informed decision to prioritize features, that equitably distributes available release capacity, and that provides assurances that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs, subject to available capacity. BellSouth's proposal, which has been endorsed by KPMG and the Florida Public Service Commission Staff, is reasonable and should be adopted.

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			The BellSouth caveats included in their proposed language here "in the CLEC Production Releases that will occur" and "subject to available capacity" are prime examples of the key differences between the CLEC's and BellSouth's overall positions on the nature of the CCP. See Item 5 above for the full details of the CLECs' support for their proposed language.	
27	4.0 – Part 2 – Step 10, Act #4	D 46	Active project management of the implementation of upcoming releases is underway in this part of the process. The CLEC's request the sharing of updated and sizing information as development occurs. BellSouth's response is that it will not provide updates. This makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	BellSouth's language clearly identifies the manner in which estimated units of effort will be provided consistent with the process to which the CLECs agreed earlier this year, which is outlined in Appendix H. The CLECs' proposed language is too general and does not clearly set forth the information that BellSouth is to provide.
28	4.0 – Part 3 – Header & 1st Paragraph	D 48	The CLEC's propose a process (Exception Process) that with mutual consent will allow either the expedited implementation of a feature change request (Expedited Feature Process) or the implementation of a feature change request beyond the 60 week interval (Negotiated Extended Implementation Process) without prejudice. BellSouth rejects the Negotiated Extended Implementation Process ("BellSouth does not support."), and modifies the Expedited Feature Process to exclude BellSouth initiated changes from the mutual consent requirement.	The CLECs have proposed this section in an attempt to address BellSouth's concern about having to implement ALL features within 60 weeks as requested by the CLECs. Although the CLECs have proposed that BellSouth implement all features within 60 weeks of prioritization with NO constraints such as capacity, this section states that if BellSouth should not have enough capacity, it can present its case to the CCP membership and they will be the body to approve whether or not BellSouth is granted a stay of implementation of all features. This proposal is not practical or realistic. The CLECs have no incentive to grant BellSouth any relief, no matter how compelling the circumstances. As has been proven in past CCP meetings, the CLECs operate as a coalition against BellSouth, which has only one

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				vote, in any matter when it comes to prioritization and scheduling. BellSouth cannot agree to such one-sided language, which places in the hands of CLECs the level of investment that BellSouth must make in its OSS. To BellSouth's knowledge, no other ILEC is subject to such a Change Control Process.
29	4.0 – Part 3 – Expedited Feature – 2nd Bullet	D 48	The CLECs propose a single process applicable to any feature change request regardless of its origin. See Item 31 below. BellSouth's modifications allow BellSouth the unilateral right to expedite its own changes without either consultation with or mutual consent of the CLECs. Historically, this is exactly how BellSouth has used this process.	BellSouth's recommended language clarifies the agreement for expediting features consistent with CLEC Production Releases.
30	4.0 – Part 3 – Negotiated Extended Implementation	D 48	Here and in the figure identified in Item 32, the CLECs propose a Negotiated Extended Implementation Interval Process. As discussed in Item 4 above, such a process directly addresses BellSouth's fear that CLECs would willfully over load the CCP with change requests in order to make it impossible for BellSouth to meet the 60 week implementation interval. BellSouth rejects the concept of a Negotiated Extended Implementation Interval without explanation.	The issue in dispute is the same as Item No. 28. The CLECs' proposed language is one-sided and would place in the hands of CLECs the level of BellSouth's OSS investment, to which BellSouth cannot agree for the reasons previously explained.
31	4.0 – Part 3 – Enhancement – 4th Bullet	D 49	The CLEC's proposal provides for the possible use of an Expedited Feature Process for all types of feature related change requests (2,3,4 and 5) by mutual consent. (See also Item 33 for the associated detailed Step 3A activities.)	BellSouth agrees with CCP membership concurring to expedites within CLEC Production Releases since these releases are "earmarked" for CLEC requests. Because BellSouth Production Releases are intended for implementing BellSouth priorities (which can include CLEC-initiated Change Requests), BellSouth should not

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Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
			BellSouth agrees that mutual consent should be obtained for the use of the Expedited Feature Process for Type 3 and Type 5 changes, but reserves to itself the right to unilaterally expedite Type 2 and Type 4 changes. See Item 6 above for the full details of the CLECs' support for their proposed language.	be required to consult the CCP membership for consensus in expediting features into a BellSouth Production Release. BellSouth does agree that the CCP should be notified of these expedite requests in an expeditious manner.
32	4.0 – Part 3 – Figure 4-X: Negotiated Extended Imp. Feature Process	D 40-50	Here and in Item 30 above, the CLECs propose a Negotiated Extended Implementation Interval Process. As discussed in Item 4 above, such a process directly addresses BellSouth's fear that CLECs would willfully over load the CCP with change requests in order to make it impossible for BellSouth to meet the 60 week implementation interval. BellSouth rejects the concept of a Negotiated Extended Implementation Interval without explanation.	The issue in dispute is related to Item Nos. 28 and 30, which concerns the CLEC proposal that, if BellSouth does not have enough capacity to implement Change Requests within 60 weeks, it can present its case to the CCP membership and they will be the body to approve whether or not BellSouth is granted a stay of implementation of all features. As previously explained, this proposal is not practical or realistic and would place in the hands of CLECs the level of investment that BellSouth must make in its OSS. To BellSouth's knowledge, no other ILEC is subject to such a Change Control Process.
33	4.0 – Part 3 – Step 3A	D 55	The CLECs present the detailed Step 3A information necessary to make mutual consent for expedited implementation proposal discussed above in Items 29 and 31operational. BellSouth's recommended alternative allows BellSouth the unilateral right to expedite its own changes without either consultation with or mutual consent of the CLECs.	The issue in dispute is the same as Item Nos. 28, 30, and 32, which concerns the CLECs' proposal that the level of BellSouth's OSS investment be placed in their hands. BellSouth cannot agree to this proposal for the reasons previously explained.
34	4.0 – Part 3 – Step 4, Act #2	D 55	As BellSouth has confirmed, the processes being considered for change within BellSouth's internal process exist only to support	This issue in dispute is related to Item Nos. 2, 21, and 23 and concerns the CLECs' request to participate in internal BellSouth

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Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
			BellSouth's operations to serve the CLECs. There is no relationship to any other portion of BellSouth's business. Despite this the CLECs have no visibility into the process or objective representation within it. See Item 2 above for the full details of the CLECs' support for their proposed language.	meetings. For the reasons previously explained, BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively.
35	5.0 – 3rd Paragraph	D 57	Once again, BellSouth creates an issue with the definition of a defect that did not previously exist and as it did above in Item 9 ties reduced implementation intervals discussed below in Item 36 and 37 to it. See Item 2 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item No. 8a and concerns the need to clarify a Type 6 Change Request as a true software defect, which would allow BellSouth to shorten the intervals applicable to implementing such Change Requests. The current definition of a Type 6 Change Request includes an oversight in documenting functionality, which is not a true software defect.
36	5.0 – Medium	D 57	BellSouth's recommended alternative language calls for the correction of medium impact defects in 45 business days (or next available maintenance release). The CLECs propose 20 business days for this same interval. See Item 9 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item No. 9 and concerns the timeframe for correcting "medium impact" software defects. "Medium impact" software defects are defined as an impairment of a critical system function, although a workaround solution does exist. The current timeframe for correcting "medium impact" software defects – ninety (90) business days – was established to comply with an order entered by the Florida Public Service Commission last year in an arbitration initiated by AT&T. Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP. Even though the current timeframe for correcting "medium impact" software defects is the direct result of a state commission order, BellSouth is willing to reduce this interval to forty-five (45) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Forty-five (45) days is a reasonable amount of time

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Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
				to correct a defect that has an acceptable workaround. This interval allows consideration of the defect priority to other features that may be in development and vying for resources and enables the defect to be implemented within the release schedule presented to the CCP members. It also would allow BellSouth to meet the CLECs's request that Type 6 defects be corrected in maintenance releases whenever possible thereby not affecting the production releases and their corresponding capacity. Maintenance Releases are normally scheduled any month that a production or industry release is not scheduled, and establishing a forty-five (45) business day interval should allow BellSouth to accommodate the CLECs' request.
37	5.0 – Low	D 58	BellSouth's recommended alternative language here calls for the correction of low impact defects in 60 business days. The CLEC's propose 30 business days for this same interval. See Item 9 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item No. 9 and concerns the timeframe for correcting "low impact" software defects, which are defined as failures causing inconvenience or annoyance. The current timeframe for correcting "low impact" software defects is "best effort" because such defects have no immediate adverse impact to the users. As a result, correcting such defects does not and should not take a high priority in implementation, particularly when compared to other Change Requests. Nevertheless, BellSouth is willing to commit to correcting "low impact" software defects within sixty (60) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Sixty (60) business days is a reasonable amount of time to correct a defect that does not detrimentally affect performance or stability or otherwise adversely impact a CLEC.
38	5.0 – Step 5 Cycle Time	D 65	At this reference point the detailed step level language necessary to make the medium and low impact correction intervals discussed in Items 36 and 37 above operational. The proper intervals based on	This issue in dispute is related to Item Nos. 9, 36, and 37 concerning the timeframes for correcting "medium impact" and "low impact" software defects. As previously explained, BellSouth has proposed

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Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
			BellSouth's demonstrated capabilities are 20 and 30 days respectively. See Item 9 above for the full details of the CLECs' support for their proposed language.	reducing the intervals applicable to correcting true software defects in order to address the CLECs' request that software defects be corrected in a shorter period of time. BellSouth can only accommodate this request if the definition of a Type 6 Change Request is clarified to include only true software defects, as BellSouth has proposed in Item No. 8a. Absent this clarification, errors in documenting functionality are considered a Type 6 Change Request, which requires work analogous to adding a new feature to fix and which cannot be accomplished in a shorter amount of time.
39	6.0 – Part 1 - NOTE	D 71	BellSouth creates an issue with the timing of prioritization sessions that did not previously exist. See Item 15 above for the full details of the CLECs' support for their proposed language.	BellSouth has proposed language to clarify that a prioritization meeting should only be held when applicable.
40	6.0 – Part 2 4th & 5th bullets	D 71-72	BellSouth elected to address Section 6.0 – Part 2, bullets 4 and 5 as separate line entries. The CLECs' comments are all included in Item 40. BellSouth's green-line alternatives for these two bullets are parallel to positions discussed above in Items 11 through 19. In addition, bullets 7 through 10 (including two associated footnotes, all discussed below in Item 41) are proposed by BellSouth as additional explanation of their efforts to limit the CLECs knowledge of and participation in the process. The CLECs propose the on-going sharing of information at each step in the process where the information is likely to change (for example	BellSouth's response does not disagree with the CLEC-requested language but rather explicitly details what the CLECs will receive. That is, BellSouth provides the CLECs options so that they can select a rolling release plan they choose for the following year. The plans include associated available units of capacity estimated for each release and estimated capacity for each Type 4 and Type 5 Feature that is a candidate for prioritization. This information has been provided for 2003 planning.

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Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
			prioritization, release package development, release management and implementation, and post implementation. The CLEC's proposal requests that data at these points be provided in the same groupings of categories to allow for tracking and the early detection of potential problems. Appendix I (to which the parties have agreed) provides post implementation data in distinct categories. The CLECs propose Appendix 1-A (See Item 48 below and page 117 of the Updated CCP Document) for the reporting of Pre-Release Capacity Forecast information and changes during the process steps using the same categories as in Appendix I. With this constancy in the reporting of the basic process data the effectiveness of the process can be analyzed and improvement plans developed. BellSouth's proposed language in contrast limits providing sizing information to only certain types of change requests, and only at a single point in the process (prioritization). Further it limits the sharing of information on releases to an annual snapshot in a format and grouping inconsistent with Appendix I making both in progress evaluation of the process and post implementation evaluations impossible (See Item 48 below and page 118 of the Updated CCP Document). BellSouth's proposal excludes the CLECs from access to information about the process as changes occur which are vital to the CLECs internal resource planning.	
40a	6.0 – Part 2 5th bullet	D 72	BellSouth elected to address Section 6.0 – Part 2, bullets 4 and 5 as separate line entries. The CLECs' comments are all included in Item 40.	This issue in dispute is related to Item Nos. 11, 18, 19, and 20 and concerns the information to be provided in connection with CLEC prioritization efforts. BellSouth is committed to providing complete and timely information to assist the CLECs, which earlier this year agreed to a process (contained in Appendix H) by which BellSouth

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				provides the feature sizing for the Type 4 and Type 5 Change Requests that are candidates for prioritization. Once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, which contains a 12-month view of features scheduled, implemented or planned. The parties disagree about the specific feature sizing information that should be provided. The CLECs' Appendix I-A suggests that there is a set amount of capacity for each category they list by release. This is not the case. Production Releases, whether a CLEC or BellSouth Production Release, can have Types 2, 4, 5, or 6 Change Requests. In the case of the Type 4s and 5s, they are optional and entirely dependent upon whether it is a CLEC or BellSouth Production Release. In either case, during a "Pre-Release" point in time, these releases are open to any and all types as mentioned. Listing Units by category, as the CLECs' proposed Appendix I-A would require BellSouth do so, erroneously presumes that BellSouth knows how much capacity by category each release would have before prioritization and release planning by the CLECs. Although BellSouth could arbitrarily designate release capacity by category, there is no logical basis for doing so. As an alternative, BellSouth offers Appendix I-B, which provides pre-release capacity information, expressed in units, and provides the intelligence for the CLECs to determine the pre-release capacity available. It also allows for the flexibility and reality of how the Change Request types correspond to release types. For example, Type 6s and PSN mandates are predominantly targeted for maintenance releases, while Types 2s, 4s, and 5s are targeted for production releases in accordance with the BellSouth and CLEC Production Release guidelines. Lastly, Type 3s are targeted for the Industry Release. The information that BellSouth proposes to provide to the CLECs to assist in the prioritization effort,

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				as outlined in Appendix I-B, is reasonable and should be adopted.
41	6.0 – Part 2 – Bullets 7-10	D 72	In footnote 14 BellSouth expressly states that the management and implementation of its own change requests and its own releases will be "outside of this process." BellSouth's proposal prevents the CLECs from being able to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP. In Bullet 7 BellSouth uses the term "rolling release plan." However, experience has proven that this is nothing more than an annual single point in time snapshot of the next year's preliminary plans. For 2003, this snapshot was not delivered until May of 2002, illustrating that BellSouth is not currently performing any proactive planning based upon change requests submitted to it Change Control Group. The CLEC's related proposals are for the forward looking quarterly updating and sharing of a true rolling release plan for the balance of the current year and the next based upon implementation of prioritized change requests within in a 60 week interval. In Bullet 7, BellSouth further states that it will produce two views, with and without the inclusion of an Industry Standard Release and then require the CLECs to vote between the two. Industry Standard Releases have not and will not occur on an annual basis; the last one was is 1999 and the next one will not be until 2003. The CLEC's related proposals call for the preparation and analysis of a number of alternatives for future release plans resulting in a consensus decision over a planning horizon that addresses all forecast needs, including infrastructure upgrades and industry standard upgrades as required. It is clear from the limited data that BellSouth has provided concerning	The bullet points detail the options provided to the CLECs under BellSouth's comprehensive prioritization proposal. That is, the CLECs have the option to select whether or not to have an Industry Release (Type 3s) for a given year or whether to focus on Production Releases (Type 4s and 5s). Furthermore, it defines the equal allocation of capacity between the CLEC and BellSouth Production Releases. Lastly, it defines the commitment to deploy features in a timely manner. This proposal provides the CLEC with the flexibility and options to make their own decisions on how to use the releases in the coming year.

Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
			2003 that their planning made no allowances for either the necessary infrastructure upgrade or industry standard releases – it was simply based on the assumption that the "2003 program demand would be similar to 2002." In Bullet 8, BellSouth makes a half-hearted and inappropriate commitment that "Total CLEC and BST production releases are equal in estimated number of units capacity." As discussed above in Item 17 there is no justification for this blind allocation of resources and it is in fact detrimental to the accomplishment of the prime objective of the CCP, timely and effective implementation of feature and defect change requests. In Bullets 9 and 10, BellSouth repeats its proposals to limit the scope of the process to "CLEC Production Releases" and "available capacity". In footnote 14 it expressly states that the management and implementation of its own change requests and its own releases will be "outside of this process." BellSouth's proposal prevents the CLECs from being able to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	
42	6.0 – Part 4	D 75-76	In Part Four many of the individual Items discussed above related to sizing, sequencing and the use of prioritization are repeated. BellSouth's modifications and caveats include "for the release being scoped", "for the next CLEC production release(s)", "may develop several variations of release packages", and "into this CLEC Production Release". Related Items discussed above include 1, 4, 5,	This issue in dispute is related to Item Nos. 4, 7, 24 and 26, which concern the CLECs' request that BellSouth devote unlimited release capacity to implementing every Change Request within 60 weeks of prioritization, which, for the reasons previously explained, BellSouth is unwilling to do. BellSouth has developed a comprehensive prioritization process that gives the CLECs the necessary tools to make an informed decision to prioritize features, that equitably

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			7, 8, 15, 17, 22, 24, 25, 26, 40, and 41. Footnote 15 states "Capacity estimates for change requests and releases will be used as a guide in determining how many change requests will be assigned to these releases." clearly demonstrating that BellSouth is determining release capacity first without consideration of demand, and then limiting the number of changes that can be implemented based upon the arbitrarily determined release capacity. In addition, BellSouth provides four bullets labeled "Release Implementation Hierarchy". The CLECs concur with the first three bullets as written, and would agree to the fourth with the addition of the following phrase "and may be assigned to any production release".	distributes available release capacity, and that provides assurances that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs and subject to available capacity. BellSouth's proposal, which has been endorsed by KPMG and the Florida Public Service Commission Staff, is reasonable and should be adopted.
43	6.0 – Part 5	D 76-77	In Part Five many of the individual Items discussed above related to Release Capacity forecasting, Allocation, and Reporting are repeated. Related Items include 11, 12, 13, 14, 16, 17, 18, 19, 20, 27, and 40. The CLEC's proposal is clearly more comprehensive and as discussed above more consistent, with the objectives of the CCP, evaluation of its effectiveness and on-going improvement. The CLECs agree with and adopt the last bullet in BellSouth's proposal "On an ongoing basis, Legacy System Releases will be posted to the website. See Appendix J."	BellSouth's proposed language outlines the Forecast and Planning Information that is now available to the CLECs. Most of these tools were not available at the time the CLECs drafted their proposed language or were recently implemented. All of this information was provided at the request of the CLECs and should provide the information necessary for their planning. BellSouth agreed and has provided the estimated units available for Type 3 (typically referred to as an industry release or ELMSx) and has provided the estimated units of capacity of the remaining releases. The remaining capacity is shown as CLEC Production Release(s), BellSouth Production Release(s) and Maintenance Releases. BellSouth's proposed language details the actual deliverables and commitments.

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Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
				BellSouth's language again details how it will provide the information requested by the CLECs. BellSouth provided the information in a release management planning format in order for the CLECs to view it as a project timeline. Maintenance releases are provided with estimated units of capacity. Both public switch network and Type 6 changes are expected to be deployed in these releases. Type 2 (Flow Through) Features were provided with estimated Units of Capacity, along with estimates for Types 4 and 5 change requests. Type 3 is a standalone release and was provided as well.
44	10.0	O 88-96	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision. The joint development of an updated testing process is underway. It is anticipated that a workshop or other exchange of language for this section to resolve this issue will be held in the near future.	This issue is still under discussion by BellSouth and the CLECs.
45	11.0 – Terms & Definitions – Release - Production	O 104	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision.	This issue is still under discussion by BellSouth and the CLECs.
46	11.0 – Terms & Definitions- Release Capacity Measurement	D 104	This is Item 43 in the format of a terminology definition. See Item 43 and its other related Items. This definition will be changed to reflect the Commission's decisions on the underlying Items.	This issue in dispute is related to Item Nos. 11, 18, 19, 20, and 40a and concerns the information to be provided in connection with CLEC prioritization efforts. BellSouth is committed to providing complete and timely information to assist the CLECs, which BellSouth's proposal would do.
47	Appendix D	O 109-110	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision.	This issue is still under discussion by BellSouth and the CLECs.
48	Appendix I-A	D	The CLEC's proposed format is consistent with Appendix I and will	This issue in dispute is related to Item Nos. 11, 18, 19, 20, 40a, and 46

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Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
	& I-B	117-118	allow for direct evaluation of the process and the development of improvement plans. The BellSouth proposed format will not provide these capabilities. The BellSouth proposed format however does provide valuable information and should be approved as a supplemental format.	and concerns the information to be provided in connection with CLEC prioritization efforts. BellSouth is committed to providing complete and timely information to assist the CLECs, which BellSouth's proposal would do.
49	11:0 – Terms & Conditions – Defect Definition	D 101	This is Item 9 in the form of a terminology definition. See Item 9 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item Nos. 8a and 35 concerns the need to clarify a Type 6 Change Request as a true software defect, which would allow BellSouth to shorten the intervals applicable to implementing such Change Requests. The current definition of a Type 6 Change Request does not accurately define a software defect because it includes an oversight in documenting functionality. BellSouth's proposal to clarify this definition to include only true software defects would allow BellSouth to shorten the intervals applicable to implementing Type 6 Change Requests, as the CLECs have requested. Absent this clarification, errors in documenting functionality are considered a Type 6 Change Request, which requires work analogous to adding a new feature to fix and which cannot be accomplished in a shorter amount of time.

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

IN RE: Performance Measurements for Telecommunications Interconnection, Unbundling and Resale	)))	**Docket No. 7892-U**

CLEC COALITION COMMENTS

Comes now the CLEC Coalition[1] and files, as requested in the Staff's letter of June 10, 2002 its comments on the performance metrics, benchmarks, and analogs used to measure BellSouth's performance in the Change Control Process ("CCP").

I. INTRODUCTION

Change control involves managing the process of making changes to BellSouth's operations support systems ("OSS"). More specifically, change control concerns the submission, acceptance, prioritization, scheduling and implementation of change requests, whether the source of the request is BellSouth, a CLEC or a regulatory agency. It also deals with the documentation and testing of changes prior to implementation and the correction of defects after implementation. Just as nondiscriminatory access to OSS is crucial to CLECs' ability to compete in the local market, change control is critical to developing and maintaining nondiscriminatory OSS. Without an effective CCP and

[1] The CLEC Coalition includes Access Integrated Networks, AT&T Broadband Phone of Georgia, L.L.C., AT&T Communications of the Southern States, L.L.C., Birch Telecom of the South, Inc., Cbeyond Communications, L.L.C., DIECA Communications, Inc. d/b/a Covad Communications Company, e.spire Communications, Inc., ITC^DeltaCom, Inc., Time Warner Telecom L.P., US LEC Corp., WorldCom, Inc., and The Southeastern Competitive Carriers Association (members include Access Integrated Networks, Inc., Actel Integrated Communications, Inc., ASCENT, AT&T, Birch Telecom Inc, Business Telecom, Inc., COMPTEL, ConnectSouth Communications, Inc., e.spire Communications, KMC Telecom, ICG Communications, ITC DeltaCom, Inc., WorldCom, Inc., NewSouth Communications, Qwest Communications, Rhythms Links Inc., Time Warner Telecom, TriVergent Communications, US LEC Corp., XO Communications).

Performance Measurement Plan, that includes penalties associated with the performance of the CCP, BellSouth is left with unfettered discretion to make as many or as few changes as it wishes, to test changes as it sees fit, and to provide change notices as it deems appropriate.

The current CCP is deeply flawed. Additionally, the existing Measurement Plan is deficient because, among other problems, it does not provide for any penalties that would encourage BellSouth to improve the CCP or its performance in implementing change requests.

Members of the CLEC Coalition have provided evidence of the CCP deficiencies and BellSouth's failure to adhere even to the current requirements in various filings before this Commission and the FCC. As a result, a series of Workshops were held during March, April and May in an attempt to reach a collaborative agreement on changes to the process that would eliminate these deficiencies. The Staff observed each of these sessions, including the May 2, 2002 session at which impasse was reached on 25 issues.[2] Even though the CCP workshops have not focused upon performance measurements to improve and measure the process, the CCP and measurements are inseparably linked.

As a result of participation in both the CCP workshops and the separate Performance Measurements workshops the Coalition members recommend that changes be made to three metrics discussed during the workshops (CM-6, CM-7, and CM-8) and that a metric to measure the implementation of feature changes be added (CM-9). The changes discussed below are consistent with the Coalition's proposed changes to the CCP which

[2] These 25 issues are grouped into three broader categories, (1) Prioritization, Sequencing and Scheduling which contains 18 issues, (2) Defect Correction which contains 4 issues, and (3) Expedited Feature

is being submitted separately in the form of joint filing with BellSouth of an Updated Red-line/Green-line Document and a Disputed Issues Matrix.

II. CHANGES TO METRICS PREVIOUSLY DISCUSSED

A. CM-6: Percent of Outages and Software Errors Corrected in 3, 10, 20 or 30 Business Days. (Attachment 1)

The Coalition recommends modification of this metric to include outages (Type-1 changes), establish a 95% benchmark, and include the metric in the SEEM plan with penalties to be assessed each month the benchmark is not met.

The 3 and 10 business day intervals are a part of the current CCP process. The 20 and 30 business day intervals for medium and low impact defect corrections are consistent with the Coalition's proposed changes to the process discussed in Items 9, 35, 36, 37, and 38 of the Disputed Issues Matrix.

BellSouth's performance in its voluntary correction of the majority of the "low impact" defects associated with the implementation of its Parsed Customer Service Record within 24 calendar days demonstrates that the Coalition's proposed 30 business day interval is obtainable and reasonable.

The lack of a benchmark and the exclusion of this metric from the SEEM plan fail to provide BellSouth with any incentive to meet this metric on a consistent basis. This can be seen in the implementation of defect corrections occurring more recently. BellSouth's Release 10.5, which was implemented more than two months after completion of the implementation of the parsed CSR defect requests, included nine defects change requests that had been submitted between 106 and 295 days prior to their implementation date. In Releases 10.6 and 11.0, scheduled for implementation later this

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Implementation which contains 3 issues.

year, all but one of the defect change requests scheduled for implementation were submitted at least 102 days prior to the scheduled implementation – including one request that was submitted 412 days prior to it its scheduled implementation date of August 24, 2002. In the absence of any penalty associated with this metric will have no meaning for BellSouth.

B. CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days. (Attachment 2)

The Coalition recommends modification of this metric to clarify that all requests received within a month are to be included in the measurement, to establish a 95% benchmark, and to include the metric in the SEEM plan with penalties to be assessed each month the benchmark is not met.

C. CM-8: Percent Change Requests Rejected (Attachment 3)

The Coalition recommends modification of this metric to clarify that all requests received within a month are to be included in the measurement and to provide individual reporting for each valid rejection reason.

III. NEW COALITION PROPOSED METRIC

A major stated and published objective of the CCP is "timely and effective implementation of feature and defect change requests." However, the existing CCP contains no intervals or guidelines for the actual implementation of feature change requests. Likewise, the performance measurement plan does not contain a metric to measure the implementation of feature changes.

Operating in this environment has resulted in the creation of an on-going backlog of feature change requests and excessively long implementation intervals for the majority of requests implemented.

The current backlog is 65. 36 are Type-5 (CLEC-initiated), 10 are Type-4 (BellSouth-initiated), and 19 are Type-2 (Regulatory, mostly Flow Through Task Force initiated):

- 5 of the requests are "New." Under the CCP, a "new" request is a change request that has been received by the BellSouth Change Control Manager, but has not yet been validated. Although the interval for validation under the CCP is 10 business days, BellSouth did not meet that timetable for any request. One of the requests was filed as long ago as December 2000.

- 5 of the requests are "Pending." A "pending" request is a change request that has been accepted by the BellSouth Change Control Manager and scheduled for change review and prioritization. One of these requests was submitted in April 2000, and two others were submitted more than nine months ago.

- 42 of the requests are "Candidate Requests." A "Candidate Request" is a change request that has completed the change review and prioritization process and is ready to be scheduled for implementation in a release. 16 of these requests (or nearly 40 percent of the total) were originally submitted in 1999 or 2000. An additional 7 requests were submitted between January and June 2001. 16 of the "Candidate Requests" were prioritized in April 2001, but have still not been scheduled by BellSouth for implementation. BellSouth has announced that none of these "Candidate Requests" can be scheduled for implementation before May 2003.

- 13 of the requests are "Scheduled." A "scheduled" request is a change request that has actually been scheduled for implementation through a BellSouth release. The 13 requests have been scheduled for implementation for August or December 2002. For eight of these requests, the scheduled implementation date is at least 19 months (and as long as 34 months) from the date on which the request was originally filed. The implementation dates scheduled for three additional requests are between 11 and 14 months from the original submission date. One of the scheduled requests was originally submitted in August 1999; the majority of the remaining requests were submitted by December 2000.

Because of these issues, the Coalition recommends that a new metric **"CM-9: Percent of Change Requests (types 2, 4 & 5) Implemented Within 60 Weeks of Prioritization"** (Attachment 4) be adopted by this Commission. The structure of the Coalition's proposed new metric is consistent with the Coalition's proposed changes to the process discussed in Items 3, 4, 5, 7, 8, and 26 of the Disputed Issues Matrix As with metrics CM-6 and CM-7, a key element of the Coalition's proposal is that metric CM-9 be included in SEEM. To ensure fairness to BellSouth, the Coalition proposal defers the inclusion of this metric in SEEM until 60 weeks after the first prioritization meeting following the Commission's approval of the measure. All reporting prior to that point will be diagnostic.

IV CONCLUSION

For the forgoing reasons, the CLEC Coalition respectfully requests that the changes it proposes to the measurements associated with the CCP be adopted.

CLEC COALITION
July 5, 2002

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The members of SECCA are:
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Time Warner Telecom
TriVergent Communications
US LEC Corp.
XO Communications

Draft 1/18/02 (from workshop)

CM-6: Percent of Outages and Software Errors Corrected in X (3, 10, 9020, ~~120~~30)

Business Days

Definition

Measures whether CLECs receive timely correction of BellSouth outages and software defects. Outages are referred to and defined within the CCP as Type-1 changes. Software defects are referred to in the CCP as Type-6 changes, which occur when: (1) the interface is not working in accordance with the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs; or (2) the functional requirements agreed upon by BellSouth and the CLECs result in inoperable functionality, even though software user requirements and business rules match.

Exclusions

- Software Corrections with implementation intervals that are longer than those defined in this measure that have been agreed upon by the CLECs.
- Rejected or reclassified software errors (BellSouth must report the number of rejected or reclassified software errors disputed by the (CLECs)

Business Rules

This metric is designed to measure BellSouth's performance in correcting identified outages and Software Errors within the specified interval. The clock starts when an outage or Software Error validation is due to the CLEC per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html. The clock stops when the error is corrected and notice is posted to the Change Control Website.

Calculation

Percent of software Errors Corrected in X (3, 10, 9020, ~~120~~30) Business Days = (a ÷ b) x 100

- a = Total number of outages or Software Errors corrected where "X" = 3, 10, 9020, or ~~120~~30 business days.
- b = Total number of outages or Software Errors requiring correction where "X" = 3, 10, 9020, or ~~120~~30 business days.

Report Structure

- Type 1 Outages = 3 business days
- Type 6 High Impact = 10 Business Days
- Type 6 Medium Impact = ~~90~~20 Business Days
- Type 6 Low Impact = ~~120~~30 Business Days

Data Retained

- Report Period
- Total Completed

- Total Completed Within X Business Days
- Disputed Rejected or Reclassified Software Errors

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region • Outages • High impact • Medium impact • Low impact	• ???95% within interval

SEEM Measure

SEEM		Measure
~~No~~	Tier I	~~???~~
	Tier II	~~???~~Yes ($5,000.00 Per Affected Item for each reporting period until defect is corrected)
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• ~~???~~Region • Outages • High • Medium • Low	• ???95% within interval

Draft 1/18/02 (from workshop)

CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

Definition

Measures the percent of Change Requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html. The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to above exclusions received within a reporting period, not just those received and accepted or rejected in the same reporting period.

Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days = (a ÷ b) x 100

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ~~???~~ 95% within interval

SEEM Measure

SEEM		Measure
~~No~~	Tier I	
	Tier II	~~???~~Yes ($1,000 .Per

		reporting period)
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• ~~???~~Region	• ~~???~~ 95% within interval

CM-8: Percent Change Requests Rejected

Definition

Measures the percent of Change Requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected based on the reasons specified per the Change Control Process within the report period.

Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html. These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to above exclusions received within a reporting period, not just those received and rejected in the same reporting period.

Calculation

Percent Change Requests Rejected = (a ÷ b) x 100

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

Data Retained

- Report Period
- Requests Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• Diagnostic
• Reason – Cost	
• Reason – Technical Feasibility	

• Reason – Industry Direction	

SEEM Measure

SEEM		Measure
No	Tier I	
	Tier II	
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

New Metric proposed by CLECs (6/24/02)

CM-9 Percent of Change Requests (types 2, 4 & 5) Implemented Within 60 Weeks of Prioritization

Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

Exclusions

Change requests that are implemented later than 60 weeks with the consent of the CLECs.
Change Requests for which BellSouth has regulatory authority to exceed the interval.
Change Requests for which BellSouth and the CLECs have agreed to a Negotiated Extended Implementation.

Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from the first prioritization meeting following Commission approval of measure.

Calculation

Percent Change Requests Implemented in 60 weeks = (a ÷ b) x 100

a = Total Number of Change Requests Implemented within 60 weeks of prioritization
b = Total Number of Change Requests implemented in the reporting period

Report Structure

- BellSouth Aggregate
- Type 2s implemented
- Type 4s implemented
- Type 5s implemented
- % implemented within 8, 16, 24, 32, 40, 48, 56, and 60 weeks

Data Retained

Report Month
Total Implemented, by type
Total Implemented within 60 weeks

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark

• Region	• 95% within interval
• Type 2s implemented	• 95% within interval
• Type 4s implemented	• 95% within interval
• Type 5s implemented	• 95% within interval

SEEM Measure

SEEM		Measure
Yes	Tier I	
	Tier II	Yes ($15,000 per affected item for each reporting period until request is implemented)
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

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April 19, 2002

VIA ELECTRONIC FILING
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Federal Communications Commission
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Re: Second Joint Application of BellSouth for Provision of In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 02-35.

Dear Ms. Dortch:

AT&T Corp. ("AT&T") submits this letter in response to BellSouth's Supplemental Reply Comments and recent ex partes. The record in this proceeding establishes that BellSouth continues to fall substantially short of the requirements of Section 271 and the Commission's prior orders.

This *ex parte* focuses on two areas in which the problems revealed by the record are particularly severe. Part I addresses BellSouth's change control processes, which, as the record evidence (including the evaluation submitted by the Department of Justice) confirms, remains badly dysfunctional. Part II addresses issues of data integrity, focusing on the service order accuracy measurement that BellSouth recently and unilaterally revised. As is discussed in more detail below, and in the accompanying affidavit of Robert Bell, KPMG in the Florida metrics test has found that BellSouth has biased its service order accuracy results by manipulating and increasing its sample sizes whenever the data would otherwise show unacceptable performance.

I. BELLSOUTH HAS NEITHER ESTABLISHED, NOR ADHERED TO, AN ADEQUATE CHANGE CONTROL PROCESS.

The Commission has previously held that "in determining section 271 compliance, we review the adequacy of the change management plan *that is in place at the time the application is filed.* We further review whether the BOC has demonstrated a pattern of compliance with the plan." *Texas 271 Order* ¶ 117 (emphasis added). The record demonstrates, however, that the BellSouth change control process ("CCP") in effect at the time of its latest application is inadequate – and would be inadequate even with the modifications that BellSouth proposes to make in the process. Furthermore, BellSouth has not even complied with the inadequate CCP currently in effect.

To be effective, a change management process must be designed to implement changes according to their priority, in a timely manner, and with a minimum of defects, regardless of who

initiated the change. *See* Bradbury/Norris Supp. Decl. ¶ 153. BellSouth's CCP does not meet those criteria. Moreover, none of BellSouth's recently-made or proposed modifications to the CCP would fix the fundamental, core defects in the CCP that deny CLECs a meaningful opportunity to compete. These defects include BellSouth's exclusive veto power over change requests; BellSouth's exclusive control over the prioritization, implementation, and scheduling of change requests; the substantial backlog of change requests; and the inadequacy of the test environment that BellSouth provides to CLECS. Bradbury/Norris Supp. Decl. ¶¶ 147-175.[1]

The existing CCP plainly denies CLECs a meaningful opportunity to compete, because it gives BellSouth's total control over the prioritization and implementation of changes to its OSS. That control is demonstrated by AT&T's evidence – and BellSouth's own data – regarding the current backlog of change requests, and the limited number of CLEC-initiated change requests that BellSouth has actually implemented. BellSouth, for example, does not dispute the data that AT&T presented showing the substantial backlog of change requests. *Id.* ¶¶ 145-147 (showing that 93 change requests for features, and 33 defect change requests, had not been implemented as of February 20, 2002). Instead, BellSouth describes the backlog only as "the 40 Change Requests that are in 'new' or 'pending clarification' status" as of March 24, 2002, according to its own data. Stacy Supp. Reply Aff. ¶ 61. BellSouth's crabbed definition of "backlog" is unrealistic. BellSouth admits that its calculation of the backlog omits 55 change requests that have been scheduled but not implemented, 50 change requests that have not even been prioritized ("pending" requests), and 7 requests that have been prioritized, but have not been scheduled for implementation ("candidate requests"). *Id.*[2] When these change requests are included in BellSouth's calculation, the data show a backlog of 152 change requests as of March 24, 2002 – a volume larger than the backlog of 126 change requests that AT&T had calculated as of February. *Compare id. with* Bradbury/Norris Supp. Decl. ¶ 145.[3]

The few excuses that BellSouth offers for this backlog are without merit. For example, although it asserts that the majority of the 29 feature requests still classified as "new" were submitted before the 10-business-day deadline for acknowledgment went into effect in September 2001, BellSouth offers no explanation of why it *still* has not even validated these requests so long after their

[1] The various modifications that BellSouth proposes or promises to make in the CCP are of no value in any event, since they are irrelevant to the issue of whether the CCP currently complies with Section 271. *Michigan 271 Order* ¶¶ 55, 179.

[2] BellSouth misleadingly suggests that 50 change requests are "awaiting prioritization by the CLECs" (and are thus "beyond BellSouth's control") because CLECs have deliberately chosen not to prioritize any change requests since April 15, 2001. *See* BellSouth Supp. Reply Br. at 26-27; Stacy Supp. Reply Aff. ¶¶ 61, 70. The CLECs have not been able to prioritize change requests since last April because BellSouth has refused to provide CLECs with the release capacity information (including information regarding the capacity of future planned releases and the sizing of individual change requests), that they need in order to make any meaningful prioritization decisions. Although BellSouth agreed to provide to provide such sizing information in the "green-lined" version of the CCP that it submitted to the GPSC in February 2002, it still has not provided CLECs with information regarding the capacity of its releases. AT&T Supp. Reply Br. at 24 & n.32. In any event, BellSouth's description of the CLECs' prioritization decisions as "beyond [its] control" is disingenuous, since BellSouth alone makes the final prioritization decisions (and, in the case of the many areas that BellSouth regards as not subject to the CCP, such as legacy systems and billing, makes no provision even for CLECs to recommend prioritization of changes).

[3] Similarly, in its response to KPMG Exception 157 (which found "significant defects" in BellSouth's recent software releases), BellSouth admitted that its own March 5, 2002 analysis revealed a backlog of 38 system defects and 22 documentation requests. Stacy Reply Aff., Exh. WNS-12 at 5. BellSouth's figure was even higher than the backlog of 33 defect change requests as of February 20, 2002, that AT&T described in its evidence. Bradbury/Norris Supp. Decl. ¶ 147.

submission. Nor has BellSouth offered any reason why it failed to meet the 10-day deadline for requests filed since September 2001. Bradbury/Norris Decl. ¶ 145.[4] Similarly, BellSouth's claim that the CCP requires only its "best efforts" in correcting low-impact defect change requests ignores not only its long delays in implementing such requests, but the fact that Service Quality Measurements to which it has agreed set a 120-day deadline for such implementation (which BellSouth has not met).

BellSouth's own data also substantiate AT&T's evidence that BellSouth has implemented only a limited number of CLEC-initiated change requests. *See* Bradbury/Norris Supp. Decl. ¶ 148. Although it attempts to obfuscate the issue by asserting that it has implemented a total of 338 change requests of *all* types between June 1999 and March 24, 2002, BellSouth ultimately concedes that it has implemented only 75 prioritized feature change requests (37 "CLEC-initiated" change requests and 38 "BellSouth-initiated" change requests) during this 33-month period – an average of little more than two prioritized change requests per month. BellSouth Supp. Reply Br. at 26; Stacy Supp. Reply Aff. ¶ 64. Far from constituting "compelling evidence that the process is working" (BellSouth Supp. Reply Br. at 26), this record shows the total inadequacy of the existing CCP. Furthermore, despite its professed commitment to improve the CCP, BellSouth's own data show that its abysmal implementation record has continued. During the last 5 months, BellSouth has implemented only 10 prioritized change requests – a rate of implementation no better than in the past.[5]

BellSouth's data also demonstrate that most of the change requests that it has implemented are *defect* change requests – *i.e.*, change requests to repair defects in releases that it previously implemented. As previously indicated, of the 338 change requests that BellSouth claimed to have implemented as of March 24, 2002, only 75 are prioritized feature requests. With the exception of a small number of change requests for regulatory mandates and industry standards, all of the remaining 263 change requests were defect change requests. *See* BellSouth Supp. Br. at 26. Similarly, although BellSouth claims that it has implemented "more than 60 change requests" in the last three months, it fails to mention that 47 of these requests were defect change requests. Stacy Supp. Reply Aff. ¶ 17.[6]

The best evidence of the continuing problems in the CCP is found in BellSouth's own CCP Quarterly Tracking Report for the first quarter of 2002, which was issued on April 9, 2002. That report confirms that: (1) a substantial backlog of change requests exists, (2) BellSouth continues to implement CLEC-initiated change requests at a glacial pace; and (3) defect corrections comprise the

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[4] BellSouth's explanation for its delay in handling CR0127, which ITC DeltaCom submitted in August 2000 for implementation of a Pending Service Order ("PSO") indicator in the TAG interface, is similarly frivolous and misleading. *See* Stacy Supp. Reply Aff. ¶ 146. Although BellSouth suggests that this change request was submitted recently, it was actually submitted in August 2000. Bradbury/Norris Supp. Decl., Att. 38 at 4. BellSouth acknowledges that only recently did its "further investigation" reveal (contrary to the representations that it made to the Commission last November) that the PSO indicator was not available for CSRs obtained via TAG. However, BellSouth offers no explanation for its failure to take any action on ITC DeltaCom's request for at least twelve months before even determining whether the request was valid. Stacy Supp. Reply Aff. ¶ 146.

[5] *Compare* Stacy Supp. Reply Aff.. ¶ 64 (stating that as of March 24, 2002, BellSouth had implemented a total of 37 "CLEC-initiated" and 38 "BellSouth-initiated" change requests) *with* Stacy Reply Aff. ¶ 63 (stating that BellSouth had implemented 32 "CLEC-initiated" change requests and 33 "BellSouth-initiated" change requests as of October 15, 2001).

[6] Although BellSouth claims that its "progress in implementing Change Requests is illustrated by the work completed in just the last three months" in implementing Releases 10.3, 10.3.1, and 10.4, at least four of those change requests (such as those involving the parsed CSR and the "single C order") were implemented due to regulatory orders. Furthermore, BellSouth erroneously treats its implementation of the parsed CSR and order tracking functionalities as four separate change requests, rather than two. *See* Stacy Supp. Reply Aff. ¶ 66-68; *see also* BellSouth Supp. Reply Br. at 27-28. And, of course, BellSouth fails to mention the 47 defect corrections that it made during the same period.

overwhelming majority of the change requests implemented by BellSouth. For example, the report shows a backlog of 96 feature change requests (Types 2, 3, 4, and 5) existed as of April 9. Even if the 19 feature change requests described as "new" are excluded, only 24 of the remaining 77 requests have been scheduled for implementation, and only 18 other requests have even been prioritized. *See* Attachment 1 hereto (BellSouth Current Log Summary in CCP Qarterly Tracking Report).[7] The report lists an additional 68 defect change requests (Type 6) that have not been implemented; of the 52 Type 6 requests that are not "new," only 42 have been scheduled for implementation. *Id.*

The Report also confirms that most of the change requests that BellSouth *has* implemented have been defect corrections. The Report states that as of April 9, BellSouth has implemented a total of 344 change requests since the inception of the change control process. Of those 344 implemented requests, 250 requests were Type 6, 38 requests were CLEC-initiated (Type 5), 38 requests were BellSouth-initiated (Type 4), and 18 requests were regulatory mandates (Type 2).[8] In short, defect change requests have accounted for more than *72 percent* of the change requests implemented by BellSouth – in contrast to the 75 prioritized feature change requests, which represent less than 25 percent of the total (and which, on average, were implemented at a rate of only two per month during the 33-month period measured in BellSouth's report).[9]

In short, BellSouth's own Quarterly Tracking Report shows not only its failure to implement CLEC change requests in a timely manner, but also its persistent implementation of software with serious flaws. The latter problem is particularly harmful to CLECs, given BellSouth's additional failure to provide CLECs with a suitable test environment that would enable them to identify such defects before the scheduled implementation. AT&T Supp. Reply Br. at 26.

Finally, BellSouth's own data show that even when it agrees to implement a CLEC-initiated change request, BellSouth is slow to do so. BellSouth has acknowledged that the *average* interval from submission of a CLEC change request to its implementation was 164 days – almost three times that for a BellSouth-initiated change request. Bradbury/Norris Decl. ¶ 151 (noting that BellSouth's figures are, if anything, understated). Tellingly, although it claims to have made improvements in the CCP since last November, BellSouth does not claim that it has reduced this interval. In fact, some of the change requests that BellSouth implemented earlier this year (such as Change Requests 0369 and 0371) were submitted as long ago as 1999. *See* Stacy Supp. Reply Aff. ¶¶ 66-67; Bradbury/Norris Supp. Decl. ¶ 152 & Att. 40.

BellSouth's various proposals and promises to improve the CCP will not alter its continuing, exclusive control over the prioritization and implementation process. As AT&T and other parties have shown, for example, BellSouth's initial proposal to allocate 40 percent of annual release capacity to "CLEC change requests and/or CLEC regulatory driven mandates" represented no change from the

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[7] CLEC-initiated and BellSouth-initiated feature change requests account for all but 27 of these feature change requests, regardless of whether "new" requests are included. Of the remaining 27 change requests, 26 are Type 2 (regulatory) and 1 is Type 3 (industry standard), which are not subject to prioritization under the CCP.

[8] These figures were computed by combining two tables in the CCP Quarterly Report which are attached hereto as Attachment 1. BellSouth's Current Log Summary, which reflects any change requests implemented within the last 30 days; and BellSouth's Archive Log Summary, which reflects all change requests that have been implemented more than 30 days ago.

[9] BellSouth's current Change Control Release Schedule shows that 60 percent of the change requests scheduled for implementation in 2002 are defect change requests; only 25 percent of the scheduled requests are prioritized feature requests (either CLEC-initiated or BellSouth-initiated). Bradbury/Norris Supp. Decl. ¶ 161 & n.68.

status quo. AT&T Supp. Br. at 24 ; AT&T Supp Reply Br. at 22-23 & n.31. BellSouth's subsequent proposal to allocate to CLECs "at least 50 percent" of release capacity remaining after allocation of Types 2, 3, and 6 changes is at least as deficient as – and in some respects *worse* than – BellSouth's "40% Solution." Neither proposal takes into consideration the importance of the change being requested. *Id.* Furthermore, BellSouth's promise to implement the "CLECs' top 15 change requests" during 2002 not only remains unfulfilled, but also reflects its exclusive power to determine what change requests will be implemented, and when. AT&T Supp. Reply Br. at 23-24.[10] BellSouth has not even addressed, much less disputed, these deficiencies.

Faced with this evidence, BellSouth has instead suggested that: (1) the problems in the CCP described by the CLECs are, at least in part, a matter of the CLECs' own making; and (2) any deficiencies in the CCP can be resolved in current discussions between BellSouth and the CLECs or, to the extent that such discussions are unsuccessful, by the GPSC in its current review of the CCP. Neither of these arguments withstands scrutiny, and neither is calculated to address the inadequacies of the current CCP.

More specifically, the current discussions underway between BellSouth and the CLECs regarding the CCP also provide no basis for concluding that the core deficiencies in the CCP will be corrected in the near future. BellSouth and the CLECs met to discuss the "redline/greenline" document on March 28, 2002.[11] Another meeting was held on April 11, 2002. Although the discussions have been fruitful in some respects, no progress has been made in resolving the central deficiencies in the process, including BellSouth's exclusive control over prioritization, implementation, and scheduling of change requests.

It was clear from the outset of the March 28th meeting that BellSouth had not prepared any tools or suggestions in advance to facilitate discussions. Thus, the parties agreed to use a tracking tool matrix prepared by AT&T (based on the red-lined and green-lined versions) as the basis for discussions.[12] The parties discussed 17 of the 31 issues in the matrix prepared by AT&T, and reached resolution on at least 8 issues.

The issues that were *not* resolved at the March 28th meeting, however, are significant. For example, BellSouth continued to refuse to agree to the CLECs' proposal (in their red-lined version) that the scope of the CCP be clarified to include changes to gateways, changes to linkages between interfaces and its internal systems (including not only its linkage systems such as LEO and LESOG, but also manual work centers), and changes to billing systems. *See* Bradbury/Norris Decl., Att. 57 at 12-13.[13] BellSouth agreed only to investigate, and propose, language that it would accept regarding

[10] BellSouth's proposal to implement the "top 15" CLEC change requests also does not address the issue of what additional CLEC-prioritized requests will be implemented (or when) during 2002, or thereafter. AT&T Supp. Br. at 26-27; Bradbury/Norris Decl. ¶ 166. Indeed, BellSouth does not even commit to a specific schedule for implementation of the "top 15" CLEC change requests during 2002, but merely asserts that eight of the requests are scheduled for implementation by the end of June. BellSouth Supp. Reply Br. at 18, 28. *See also* Stacy Supp. Reply Aff. ¶ 65 (stating only that BellSouth "has committed to implementing the 'top 15' CLEC prioritized Change Requests this year and is well on its way to meeting this commitment").

[11] BellSouth finally agreed to the March 28, 2002 meeting after rejecting AT&T's request for such a meeting two months earlier. *See* AT&T Supp. Br. at 24-25 n.26 & Bradbury/Norris Supp. Decl. ¶¶ 158-159.

[12] *See ex parte* letter from Kathleen B. Levitz (BellSouth) to William Caton, dated April 9, 2002 ("April 9 *ex parte*"), Att. A at 2 (minutes of March 28, 2002 meeting).

[13] *See* Bradbury Opening Decl. ¶¶ 201, 205; Bradbury/Norris Supp. Decl. ¶¶ 167-168. The CLECs' proposal is consistent with the Commission's holding that a BOC's obligation to provide nondiscriminatory access to its OSS extends

its legacy and billing systems. April 9 *ex parte*, Att. A at 4, 6. Furthermore, although BellSouth agreed to include the development of interfaces in the CCP, the issue of what "interfaces" BellSouth is willing to include has not been resolved. *Id.* at 4.

More fundamentally, the March 28th meeting did not resolve the issues of BellSouth's control over prioritization, implementation, and scheduling of change requests. BellSouth, for example, rejected the CLECs' proposal to include CLEC participation (through a "Designated CLEC Co-Moderator") in BellSouth's internal prioritization process, which makes the final determination of the prioritization and scheduling of change requests. *See* April 9 *ex parte*, Att. A at 6; Bradbury/Norris Supp. Decl. ¶ 165.

A second "redline/greenline meeting" was held by the parties on April 11, 2002. Like the March 28th meeting, the April 11th meeting resulted in progress on some issues. The parties reached agreement on most "administrative issues," and resolved 11 of 50 substantive issues described in the updated tracking tool matrix.

The April 11th meeting, however, did not resolve the issues of prioritization, implementation, sequencing, and scheduling of change requests. In fact, the position that BellSouth took on these issues appeared to represent a retreat from that which it took at the March 28th meeting. As a replacement for its "50/50 Solution," for example, BellSouth made a proposal that is *worse* than its predecessor. BellSouth proposed that:

- There be *separate* production releases for the CLECs and for BellSouth;
- The CLECs could prioritize both CLEC-initiated (Type 5) and BellSouth-initiated (Type 4) changes, and could elect to have Type 4 change requests implemented in "their" releases;
- BellSouth would follow the prioritization and scheduling determined by the CLECs to be implemented in the "CLEC releases," but would have *sole* control over what changes are implemented – and when – in the "BellSouth releases"; and
- BellSouth would implement prioritized CLEC-initiated change requests within 60 weeks, subject to "capacity restraints."

Although it does not contain the flawed percentage allocation approach embodied in its "40% Solution" and "50/50 Solution," BellSouth's latest proposal is deficient in other significant respects. For example, the proposal would arbitrarily divide releases by CLECs and by BellSouth and focus on the originator of the changes, rather than determine implementation of changes according to their need through simultaneous consideration of Type 4 and Type 5 changes by all parties. Bradbury/Norris Decl. ¶ 153. Moreover, under its proposal BellSouth would continue to exercise the same exclusive control over prioritization and implementation of its "Type 4" change requests that it has today (except to the extent that CLECs included Type 4 change requests in "their" releases). Finally, BellSouth's proposal to implement prioritized Type 5 requests within 60 weeks "subject to capacity constraints" is

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not merely to interfaces, but also to "any electronic or manual processing link between that interface and the BOC's internal operations support systems (including all necessary back office systems and personnel)" and all of the legacy systems that a BOC uses in providing UNEs or resale services to CLECs. *See Michigan 271 Order* ¶¶ 134-135. At the March 28th meeting, BellSouth reiterated its previous position that it would support inclusion of changes to billing systems within the scope of the CCP only to the extent that "certain ordering or pre-ordering requests to the CLEC interfaces may result in changes to the billing systems and testing" -- a limitation that ignores the fact that changes to BellSouth's billing systems are important to CLECs, regardless of their cause. Bradbury/Norris Supp. Decl. ¶ 168.

meaningless, since it would leave BellSouth with the exclusive power to decide whether capacity is sufficient to permit implementation.

BellSouth's position on other issues at the April 11th meeting called into further question its willingness to correct fundamental deficiencies in the CCP. BellSouth had indicated at the March 28th meeting that it would propose new language regarding the inclusion of legacy systems and billing systems within the scope of the CCP. At the April 11th meeting, however, BellSouth proposed only language concerning billing – and that language made only a meaningless "commitment" to advise CLECs at quarterly Local Wholesale Billing Forums of billing changes that "may impact the CLECs."[14] BellSouth also provided no indication that it is willing to reconsider its refusal to include linkages, legacy systems, and work centers within the scope of the CCP. Moreover, despite its professed commitment to provide information regarding the capacity of its releases to the CLECs, BellSouth still failed to provide such information at the April 11th meeting – and even stated that it did not know what the capacity of its releases would be for 2003.[15]

In short, the March 28th and April 11th meetings have achieved progress on some issues, but have not made any headway in resolving the most fundamental problems with the existing CCP. Furthermore, assuming that these problems remain unresolved in the meetings between the parties, it is uncertain whether, or when, that they will be fixed in the current Georgia PSC proceedings involving the CCP, notwithstanding BellSouth's assertion that those proceedings "will result in further process improvements." BellSouth Supp. Reply Br. at 18. The Georgia PSC has set no schedule for resolution of CCP issues in its proceedings. Moreover, the Georgia PSC has already found – despite overwhelming evidence to the contrary in its own Section 271 proceedings and in the current Commission proceedings – that the current CCP is an "effective" process to which BellSouth "has adhered over time." GPSC Comments filed March 5, 2002, at 25, 28.[16] Even the Department of Justice, however, cited the lack of BellSouth's compliance with the CCP – including BellSouth's recent failure to follow the CCP in implementing some of the "improvements" on which it relies in its latest Application – as one of the DOJ's principal concerns about the Application. *E.g.*, DOJ Eval. at 7-8, 13-14, 16.

For these reasons, BellSouth has failed to demonstrate that its change management process satisfies the requirements of Section 271. The existing CCP is demonstrably inadequate to afford

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[14] BellSouth's proposal is meaningless, because BellSouth alone would determine what changes in its billing systems "may" impact CLECs. Moreover, by providing that such changes would be announced only at quarterly billing forums, BellSouth's proposal creates the possibility that the CLECs would learn of such changes only *after* they had been implemented. BellSouth further sought to limit the applicability of the CCP to billing by proposing language that would require requests for changes to billing to be handled only through national industry forums that oversee billing standards – not through the CCP.

[15] Two representatives from BellSouth's Information Technology organization stated at the April 11th meeting that they had been advised by other BellSouth personnel that the capacity of the 2003 releases would be the same as that for 2002. If this information is correct, it is likely that the percentage of BellSouth's release capacity available for implementation of CLEC-prioritized requests in 2003 will be even smaller than in 2002, since industry standard LSOG-6 guidelines are scheduled for implementation during 2003.

[16] As BellSouth notes, the GPSC previously refused to consider changes to the CCP proposed by AT&T in its arbitration proceeding with BellSouth regarding the parties' interconnection agreement, ruling that disputes regarding the CCP should be resolved under the escalation and dispute resolution process in the CCP. *See* BellSouth Supp. Reply Br. at 21-22 n.16 (citing GPSC's April 20, 2001 order in GPSC Docket No. 11853-U).

CLECs a meaningful opportunity to compete, and the fundamental existing deficiencies in the CCP will not be fixed by BellSouth's recently-implemented or proposed modifications to that process.

Because of these serious problems, the Application should be denied. If the Commission nonetheless concludes otherwise, it should at least require BellSouth to make additional, substantial revisions in the CCP, including the following:

- First, BellSouth should be required to agree to a specific timetable for implementation of change requests, without attaching conditions to the timetable (such as "subject to capacity constraints"). Type 4 and Type 5 changes should be implemented no later than 60 weeks after prioritization. Only with the approval of the CLECs (or the state regulatory commission) should BellSouth be permitted to deviate from this timeline.

- Second, BellSouth should be required to implement a single prioritization process, in which BellSouth and the CLECs jointly make the final determination as to the prioritization and implementation of change requests. This process would replace the current process, under which BellSouth has a veto power over change requests, treats CLECs' prioritization of change requests as purely informational, and unilaterally makes the final determinations regarding prioritization and implementation in an internal process without CLEC involvement.

- Third, BellSouth should be required to provide complete and accurate information regarding the capacity of its releases, together with information regarding the timing of proposed releases on a rolling basis (for example, for twelve months). This information is critical to CLECs' long-term planning. Currently, BellSouth has agreed to provide capacity data only for its next scheduled release, and is unwilling to provide historical data or rolling information.

- Fourth, BellSouth should be required to commit to implementing the current backlog of change requests within a specific, reasonable timeframe. Although the above-described 60-week deadline will help to resolve the timing issues on a going-forward basis, BellSouth should be required to complete implementation of the entire backlog within a specific period. AT&T believes that an 18-month time limit should be imposed.

- Fifth, the CCP document should be revised to make clear that the CCP includes all of BellSouth's OSS used to provide services to CLECs. Thus, the CCP should be amended to specifically include within its scope all of BellSouth's legacy systems, linkage systems, billing systems, and work centers. To date, BellSouth has refused to agree to such inclusion (notwithstanding its recent acceptance of the CLECs' definition of "CLEC-affecting changes").

- Sixth, BellSouth should be required to design the CAVE testing environment to mirror the production environment. Thus, BellSouth should be required to allow CLECs to use their own codes (rather than BellSouth's codes) in the testing environment. In addition, BellSouth should be required to implement a "go/no go vote" process that would ensure that a scheduled change will go forward only with the CLECs' consent and that CLECs can stop a planned change that may cause

problems in the OSS, based on testing in CAVE or on a review of documentation when testing is unavailable.

See also Bradbury/Norris Decl. ¶ 194 (describing other revisions that are needed in the CCP). As long as BellSouth retains its power to make the final, exclusive determination as to what change requests will be implemented, and when – a power that BellSouth's actual or proposed modifications to the CCP do not alter – the CCP will not afford CLECs a meaningful opportunity to compete.

II. BELLSOUTH'S DATA ARE NOT RELIABLE OR TRUSTWORTHY.

There is no rational basis upon which the Commission can conclude that BellSouth's performance data are "meaningful, accurate, and reproducible," a fundamental showing in all prior approved applications. *Texas 271 Order* ¶ 428; *Kansas/Oklahoma 271 Order* ¶ 278. As AT&T has explained, BellSouth's performance data are inherently unreliable because: (1) certain measurements on which BellSouth relies do not accurately capture performance; (2) BellSouth has unilaterally altered performance measures in ways that can skew its actual performance; (3) BellSouth has inappropriately excluded data from its performance results; and (4) BellSouth's performance reports have been plagued with errors, internal inconsistencies and discrepancies.[17] Indeed, BellSouth's unilateral changes to its service order accuracy measurement, coupled with a recently-opened observation by KPMG during the Florida metrics audit, underscore that neither BellSouth, nor its data, can be trusted.[18]

Before BellSouth withdrew its initial application, BellSouth's own commercial performance data, as well as KPMG's testing results in Georgia and AT&T's real world experience, confirmed that BellSouth's performance in the area of service order accuracy was abysmal.[19] These errors unquestionably cause customer dissatisfaction and effectively preclude CLECs from realizing the expected efficiencies flowing from their significant investments in electronic systems. *See* AT&T at 23-24.

After BellSouth withdrew its Application, BellSouth revealed that it had changed its methodology for calculating its service order accuracy results. Critically, when BellSouth refiled its Application, BellSouth not only claimed that its service order accuracy rates had dramatically

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[17] Bursh/Norris Supp. Decl. ¶¶ 4-102; Bursh/Norris Supp. Reply Decl. ¶¶ 6-37. The lengths to which BellSouth goes to rationalize the deficiencies in its performance data are nothing short of remarkable. Thus, for example, AT&T has explained that BellSouth's completion notice interval data are inaccurate and incomplete because BellSouth excludes orders when the orders are completed in one month, but the completion notice is issued in another. Noting that AT&T's arguments are meritless, BellSouth contends that it does not "exclude" such orders, but rather chooses not to count such orders when the completion notices are sent after BellSouth's processing window closes. Varner Supp. Reply Aff. ¶ 78. BellSouth's argument is circular. The purpose of a performance measurement plan is to capture accurately the actual performance it is intended to measure. BellSouth's completion notice interval measure cannot serve its intended purpose because BellSouth omits data from its performance results. Ironically, BellSouth has admitted in the Florida workshop that these orders should be included in its performance results and has agreed to start capturing these orders in May. Varner Florida PSC Workshop Handout at 20. In all events, the data on which BellSouth currently relies to support its Application are inaccurate and incomplete.

[18] BellSouth also has failed to provide the raw data to which CLECs are entitled which are necessary to verify the accuracy of BellSouth's results. *See* Bursh/Norris Supp. Reply Decl. ¶ 31.

[19] *See, e.g.*, DOJ Initial Eval. at 22 n.51 (noting that "BellSouth missed by a wide margin almost all of the order accuracy performance standards for UNEs in June and July in both Georgia and Louisiana). *See also* Norris Decl. ¶ 35; Bradbury Decl. ¶ 115-123.

improved, but also asserted that its new and improved methodology assures greater precision in reported results. However, in view of the timing and the circumstances under which these changes were made, BellSouth's claims of "improved" performance and increased accuracy in performance reporting ring hollow. Bradbury/Norris Supp. Decl. ¶ 123; Bursh/Norris Supp. Reply Decl. ¶ 16. The mere fact that BellSouth's purported improved service order accuracy rates happened to coincide with BellSouth's changes to its methodology is highly suspicious. Bursh/Norris Supp. Decl. ¶ 105. Indeed, the reality is that BellSouth's actual performance did not improve, it simply changed its methodology. Bradbury/Norris Supp. Decl. ¶ 116; DOJ Eval. at 13 n. 57; Bursh/Norris Supp. Reply Decl. ¶ 16. Furthermore, BellSouth's changes to the service order accuracy measure, which were made "without prior approval of the Georgia PSC or notice to the CLECs" (DOJ Eval. at 13), make a mockery of the performance monitoring and reporting process and are consistent with BellSouth's general practice of unilaterally modifying performance measures whenever it suits its purposes.

To make matters worse, BellSouth's revised methodology – which BellSouth claims assures greater accuracy in performance results – suffers from fundamental infirmities that can obscure or skew BellSouth's actual performance. In this regard, because BellSouth now examines only a sample of service orders, instead of all service orders associated with the LSR, BellSouth can report perfect performance even when the associated service orders which have been excluded from the sampling frame are riddled with errors. Bursh/Norris Supp. Decl. ¶¶ 105, 112-113. Accordingly, BellSouth's methodology is flatly inconsistent with the SQM business rules which state that an order is deemed to be completed without error when "*all service attributes and account detail changes* (as determined by comparing the original order) *completely and accurately* reflect the activity specified on the original and any supplemental CLEC order." SQM at 3-34 (emphasis added).

Similarly, BellSouth's inclusion of fully-mechanized orders when calculating service order accuracy necessarily overstates BellSouth's actual performance. Bursh/Norris Supp. Reply Decl. ¶ 16; Birch Reply at 5-10. In addition, because BellSouth has changed the service order accuracy measure from a State-specific to a regional measure, it can effectively conceal subpar performance in Georgia.[20] Bell Second Supp. Reply Decl. ¶ 5. Furthermore, although BellSouth contends that its revised methodology is designed to assure that statistically valid samples are used to calculate performance results, as the accompanying declaration of Robert M. Bell shows (attached as Attachment 3), BellSouth's samples do not and cannot have the intended level of statistical precision because, *inter alia,* the very formula that BellSouth touts as evidence of the validity of its sampling approach is erroneous. Bell Second Supp. Reply Decl. ¶¶ 6-16.

Most disturbingly, KPMG recently opened an observation during the Florida metrics test, finding that BellSouth's service order accuracy results are biased in BellSouth's favor because BellSouth manipulates and increases its sample sizes whenever "the results have higher variances than

[20] The flow-through data reported by BellSouth illustrate that regionwide data can conceal substantial variations in BellSouth's performance from State to State. Although BellSouth has reported flow-through data only on a regionwide basis in its MSS reports, it was recently ordered in Section 271 proceedings in Tennessee to provide such data on a State-specific basis in response to AT&T discovery requests. BellSouth's State-specific data show considerable differences in flow-through performance among the nine States in its region. For example, Attachment 2 hereto sets forth the difference between the highest and lowest Achieved Flow-Through rate experienced by any State in the BellSouth region by month (March to December 2001) and by product category (residential resale, business resale, UNEs, aggregate of non-LNP products, and LNP). As shown in Attachment 2, the ranges are significant for each product type. Thus, one cannot assume that BellSouth's performance in a particular State reflects that which it reports on a regionwide basis.

allowed by the benchmark standards."[21] Thus, as KPMG's observation shows and as the accompanying declaration of Dr. Bell further explains, BellSouth's touted sampling methodology is a mere contrivance that permits BellSouth to game the process, increase the sample size, and obtain more favorable service order accuracy results whenever the observed error rate in the drawn sample is higher than expected. Bell Second Supp. Decl. ¶¶ 17-23.

Additionally, the metrics audit in Georgia (as well as Florida) is far from complete. In this regard, BellSouth's assertion that KPMG's February Interim Status Report confirms that data integrity testing in Georgia is 54% complete is misleading. Varner Supp. Reply Aff. ¶ 27 n. 1. KPMG's February Interim Status Report does not state precisely what percentage of data integrity testing has been completed. Notably, after KPMG issued its February Interim Status report, KPMG revealed that it has completed only 10% of the evaluation necessary for the data integrity phase of testing. In view of the significant data integrity issues that have been uncovered in Florida, as well as the considerable testing that must be completed in Georgia, it remains to be seen whether other significant data integrity problems will be discovered during the metrics audit. Bursh/Norris Supp. Reply Decl. ¶ 35; DOJ Eval. at 20.

The failure of BellSouth to provide reliable data on service order accuracy is particularly significant in view of its excessive reliance on manual processing. *See* AT&T Supp. Br. at 17-19; Bradbury/Norris Supp. Decl. ¶¶ 95-118. Notwithstanding its assertion that the "'hard facts' ruin" the data presented by AT&T regarding manual fall-out due to BellSouth system design or system error (Stacy Supp. Reply Aff. ¶ 184), BellSouth does not dispute AT&T's evidence that: (1) the rate of BellSouth-caused manual fall-out showed no improvement during 2001 (when the rate for December 2001, as in January 2001, was 21 percent); (2) even the flow-through rates that BellSouth selectively cited in its Application showed no, or little, improvement during 2001; and (3) the volumes of orders manually processed by BellSouth significantly increased during 2001. AT&T Supp. Br. at 17-18 & Bradbury/Norris Supp. Decl., Att. 15. In fact, BellSouth concedes that the flow-through rates on which it relies increased by only one percentage point in 2001 (and "may seem to reflect minor progress"). Stacy Supp. Reply Aff. ¶ 183.[22] BellSouth further concedes that the combined BellSouth-caused manual fall-out rate in January 2002 was still 19.4 percent – little different from the 21.1 percent rate it reports for January 2001. *Id.* ¶ 185.[23]

If, as BellSouth contends, the total volume of LSRs submitted by CLECs has "sky-rocketed" during the last year (*id.* ¶ 183), those volumes – and the corresponding manual processing workload of BellSouth's Local Carrier Service Center ("LCSC") – will increase even more substantially as CLECs

[21] KPMG Florida Observation 178, dated April 1, 2002.

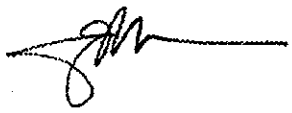
[22] As in the past, BellSouth cites only the "CLEC Error Excluded Rates" that it includes in its performance reports – rather than the "Achieved Flow-Through Rate," which is the more reliable measure of flow-through because it considers only those manually processed orders that fall out either due to BellSouth system design or BellSouth system error. *See* Bradbury/Norris Supp. Decl. ¶ 101. Like the CLEC Error Excluded Rates, BellSouth's Achieved Flow-Through Rates for January 2002 showed little, or no, improvement over 2001. For example, the aggregate Achieved Flow-Through Rate in January 2002 was 78.28 percent. Although this rate was an improvement over that for December 2001, it still is below the 79.54 percent rate for January 2001. For resale residential orders, the January 2002 Achieved Flow-Through rate of 80.82 percent is below that for December 2001 (81.62 percent) and for January 2001 (85.70 percent). *See id.*; *ex parte* letter from Kathleen B. Levitz (BellSouth) to Magalie Roman Salas, dated March 1, 2002, Attachment at 45.

[23] Although BellSouth asserts that the January 2002 rate of BellSouth-caused manual fall-out represents an improvement over that for January 2001 (Stacy Supp. Reply Aff. ¶ 185), it ignores the fact that the January 2002 rate is still higher than that for April and May 2001. *See* Bradbury/Norris Supp. Decl., Att. 15.

ramp up for mass-market entry. As a result, the likelihood of errors by LCSC representatives in manually re-keying such orders will increase exponentially. *See* AT&T Supp. Br. at 18-19. Only if BellSouth shows that it can produce reliable data on service order accuracy can its performance be properly measured – but BellSouth has yet to do so.[24]

Against this backdrop, BellSouth cannot legitimately contend that its performance data are accurate and reliable. As this Commission has emphasized, the "reliability of reported data is critical" to Section 271 analysis. *Texas 271 Order* ¶ 428. On the basis of this record, BellSouth has not met its burden of demonstrating that its performance data are accurate and trustworthy, and that its data show that it has met its Section 271 obligations.

Sincerely,



Joan Marsh

cc: Renee Crittendon
Susan Pie
James Davis-Smith

[24] In a recent *ex parte* responding to evidence presented in AT&T's reply comments, BellSouth contended that the identification of 4,581 BellSouth-caused errors as Error Code 9685 ("Due Date Could Not Be Calculated") on its Flow Through Error Analysis Report for February 2002 does not indicate a problem with its due date calculator. *See* AT&T Supp. Reply Br. at 8 & Att. 3 at 4; *ex parte* letter from Glenn T. Reynolds (BellSouth) to William Caton, dated April 12, 2002 ("April 12 *ex parte*"), at 3-4. BellSouth's argument, however, is based on the erroneous premise that these "BST-caused" errors encompass LSRs designed to fall out for manual processing. *Id.* at 4. In reality, these errors only encompass LSRs that fall out due to errors in BellSouth's systems.

ATTACHMENT 1

CURRENT LOG SUMMARY

CR TYPE SUMMARIES AS 4/9/2002

Type 2 Status

Pending	13
Scheduled	8
Candidate Request	5
Implemented	3
Pending Clarification	2
Cancelled	2
TOTAL	**33**

Type 3 Status

Pending	1
TOTAL	**1**

Type 4 Status

Candidate Request	6
Scheduled	5
Pending	5
Cancelled	5
New	2
Implemented	1
TOTAL	**24**

Type 5 Status

New	17
Pending	16
Scheduled	11
Cancelled	9
Candidate Request	7
Implemented	3
TOTAL	**63**

Type 6 Status

Scheduled	42
Implemented	22
New	16
Validated Defect	8
Pending Clarification	3
Workaround Identified	2
TOTAL	**93**

ARCHIVE LOG SUMMARY

CR TYPE SUMMARIES AS 4/10/2002

Type 2 Status

Implemented	15
Cancelled	1
TOTAL	**16**

Type 3 Status

Cancelled	2
TOTAL	**2**

Type 4 Status

Implemented	37
Cancelled	37
TOTAL	**74**

Type 5 Status

Cancelled	65
Implemented	35
TOTAL	**100**

Type 6 Status

Implemented	228
Cancelled	92
TOTAL	**320**

ATTACHMENT 2

Achieved Flow Through Rates
Range of Variance
(High State Rate minus Low State Rate)

Month (2001)	Residential Resale	Business Resale	UNE	Aggregate Non-LNP	LNP
March	12.43%	16.36%	16.37%	12.12%	68.00%
April	11.05%	33.03%	20.72%	11.61%	74.00%
May	10.11%	11.80%	15.38%	10.49%	69.00%
June	14.00%	16.53%	22.23%	14.50%	78.00%
July	16.66%	27.80%	16.26%	14.03%	69.00%
August	12.93%	14.43%	30.33%	19.43%	83.00%
September	8.40%	23.25%	16.63%	13.31%	82.00%
October	9.96%	12.96%	17.63%	12.05%	80.00%
November	11.30%	24.77%	28.00%	10.48%	80.00%
December	11.56%	20.71%	30.46%	8.88%	75.00%
Avg. Range	**11.84%**	**20.16%**	**21.40%**	**12.69%**	**75.80%**

ATTACHMENT 3

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Application of BellSouth Corporation,	)	
Pursuant to Section 271 of the	)	
Telecommunications Act of 1996	)	CC Docket No. 02-35
To Provide In-Region, InterLATA Services	)	
In Georgia and Louisiana	)	

SECOND SUPPLEMENTAL REPLY DECLARATION OF ROBERT M. BELL ON BEHALF OF AT&T CORP.

April 19, 2002

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Application of BellSouth Corporation,	)	
Pursuant to Section 271 of the	)	
Telecommunications Act of 1996	)	CC Docket No. 02-35
To Provide In-Region, InterLATA Services	)	
In Georgia and Louisiana	)	

SECOND SUPPLEMENTAL REPLY DECLARATION OF ROBERT M. BELL ON BEHALF OF AT&T CORP.

I. INTRODUCTION AND QUALIFICATIONS

1. My name is Robert M. Bell. I am currently employed as a Principal Member of Technical Staff of the Statistics Research Department at AT&T Labs-Research.

2. As part of AT&T's opening comments in CC Docket No. 01-277, I filed with the Commission an initial declaration ("Bell Decl."). On March 4, 2002, I filed with the Commission a Supplemental Declaration ("Bell Supp. Decl."). On March 28, 2002, I filed with the Commission a Supplemental Reply Declaration ("Bell Supp. Reply Decl.").

II. PURPOSE OF POST SUMMARY DECLARATION

3. The purpose of this Second Supplemental Reply Declaration is to address certain statistical issues raised in the Supplemental Reply Affidavit of Keith E. Johnson, Ph.D. ("Johnson Supp. Reply Aff.") regarding BellSouth's revised methodology for calculating its Service Order Accuracy ("SOA") results. As AT&T has explained, because of BellSouth's unilateral changes to its service order accuracy measure, BellSouth's service order accuracy results are highly suspect. In this regard, because BellSouth has changed the service order

accuracy measure from a state-specific to a regional measure, BellSouth can conceal subpar performance in Georgia. Similarly, BellSouth's small sample sizes raise concerns regarding the validity of BellSouth's disaggregated results. *See* Bell Supp. Decl. ¶¶ 6-7. Furthermore, BellSouth's inclusion of fully-mechanized orders when calculating its service order accuracy results distorts its actual performance. *See* Bursh/Norris Supp. Reply Decl. ¶ 16.

4. In his Supplemental Reply Affidavit, Dr. Johnson insists that BellSouth's new methodology assures greater accuracy in performance results and contends that AT&T's arguments regarding the defects in BellSouth's new methodology are meritless. However, BellSouth's arguments cannot withstand analysis. Moreover, an observation that KPMG recently opened during the Florida third party test confirms that BellSouth's service order accuracy results are biased.

III. DEFECTS IN BELLSOUTH'S NEW SERVICE ORDER ACCURACY METHODOLOGY

5. AT&T has previously explained that BellSouth's unilateral decision to change the service order accuracy measure from a Georgia-specific to a regional measure could mask subpar performance in Georgia. *See* Bell Supp. Decl. ¶¶ 5-6. BellSouth contends that "there is no reason to believe that SOs for one state would yield a significantly different result than SOs from any other state or for the entire region." Johnson Supp. Reply Affidavit ¶ 11. However, BellSouth provides no empirical data to support this assertion. In fact, the data BellSouth has filed previously belie BellSouth's contention and show that BellSouth's performance results in Georgia were worse than those for the entire region during certain time periods. *See* Supp. Bell Decl. ¶ 5; Stacy, Varner and Ainsworth Reply Aff. ¶ 49. If BellSouth's true error rates in Georgia are substantially different from regional results, then BellSouth's

regional service order accuracy results are misleading and will conceal BellSouth's actual performance in Georgia.

6. BellSouth also contends that AT&T's concerns about BellSouth's small sample sizes in calculating results under its new methodology are without merit. Johnson Supp. Reply. Aff. ¶ 8. As support for this proposition, BellSouth, pointing to certain calculations, contends that "a sample of 35 would be slightly more likely to overstate the error rate than to understate it," and that "a sample twice as large (70) would be more likely to understate the error rate for the universe." *Id.* However, BellSouth's calculations are nothing more than a red herring. The counterintuitive results are artifacts of the specific sample sizes carefully selected for the example. Either sample size is unbiased if the sample size is selected in advance.[1] Moreover, the example that BellSouth uses avoids the real issue, which is uncertainty, not bias. Small sample sizes lead to increased sampling error and, therefore, a greater risk that poor performance will go undetected.

7. BellSouth further contends that its revised sampling methodology will assure accuracy in its performance results. *See, id.* ¶ 17. In an effort to bolster this allegation, BellSouth, in the Supplemental Reply Affidavit of Dr. Johnson, explains that the following process is used to select the samples of service orders used to calculate performance results (*id.* ¶ 5):

> An unordered sample of 150% of the prescribed size is generated from SO records using computer generated random numbers. That is, the first SO on the list is the first one randomly selected, the second SO on the list is the second one randomly selected, etc. The reviewers begin with the first SO on the list and attempt to retrieve it for analysis. Should it be unavailable they proceed to the next

[1] *But see* Paragraphs 17-23 below (explaining that BellSouth's procedures for setting sample sizes lead to biased estimates).

> designated SO and continue until they have been able to locate, in order, the prescribed number of SOs for the sample. By maintaining the list in the order in which they were selected the randomness of the selections is insured.

8. BellSouth offers no explanation as to why it is unable to retrieve certain service orders for analysis. If the excluded service orders are more error prone, the observed error rate in the sampled population would be biased and lower than the true error rate in the complete population. Of course, the extent of the bias would depend on the proportion of service orders that are missing. Although BellSouth has not provided any data quantifying the proportion of service orders that are unavailable for review, the mere fact that BellSouth must generate a list of service orders that is 150% of the desired sample size suggests that the proportion of missing service orders could approach, but not exceed, one-third.

9. BellSouth argues that its new methodology is designed to assure that statistically valid samples are used to calculate service order accuracy results. In attempting to buttress this allegation, BellSouth states that it uses the hypergeometric distribution to compute confidence limits for proportions that are estimated using samples from finite populations. Johnson Supp. Reply Aff. ¶ 4. BellSouth asserts further that it uses "error rates slightly greater than the historical tendency [which] helps assure that the final result will be statistically valid at this level." *Id.* Additionally, BellSouth claims that these confidence limits are used to determine sample size requirements. Notably, BellSouth does not quantify the extent to which it uses error rates that are "slightly greater than the historical tendency." More fundamentally, as demonstrated in more detail below, BellSouth's analysis is flawed in other important respects.

10. Exhibit KEJ-1 which is attached to Dr. Johnson's Supplemental Reply Affidavit shows the formulas that BellSouth uses to compute the upper and lower confidence

limits. However, the formulas in this exhibit are wrong. The correct formulas for exact confidence limits are set forth in Buonaccorsi, J.P., "A Note on Confidence Intervals for Proportions in Finite Populations," *American Statistician*, August 1987, Vol. 41, pp. 215-218. Changing X, x, $L(x)$, and $U(x)$ in Buonaccorsi's notation to D, d, d_L, and d_u, respectively, makes the notation consistent with Dr. Johnson's. With the revised notation and $\alpha = 0.05$, Buonaccorsi's equation (2.4) is:

$$d_u = \text{largest } A \text{ such that } \Pr_A[D \le d] > 0.025,$$

where $\Pr_A[D \le d]$ equals the probability of finding *d or fewer* defects in the sample if there are A defects in the universe.

11. Dr. Johnson's formula is equivalent to the formula:

$$d_u = \text{largest } A \text{ such that } \Pr_A[D = d] \ge 0.025.$$

The major difference between Dr. Johnson's formula and Buonaccorsi's equation is that Dr. Johnson incorrectly uses the probability of the event $D = d$ instead of the event $D \le d$.[2]

12. The following example illustrates the impact of Dr. Johnson's errors. Assume that the number of service orders be $N = 1000$. Consider a sample size of $n = 100$, with $d = 4$ defects. Based on the table in paragraph 13 of Dr. Johnson's supplemental reply affidavit, the upper confidence limit for the overall defect rate should be no higher than 9.0%.

13. To determine the upper confidence limit, we must compute the probability distribution for the number of defects in the sample under the assumption that 9.0% of the population is in error—*i.e.* that there are $A = 90$ defects in the population of 1000 orders. I used

[2] The formulas also differ in that Johnson uses "≥ 0.025" rather than "> 0.025" in the inequality. That difference is inconsequential because it is very unlikely that $\Pr_A[D \le d]$ will equal 0.025.

the hypergeometric formula[3] to compute the lower tail of that distribution for values of $A = 89$, 90, ..., 97. The table below shows hypergeometric probability values for $d = 0$ to 4 defects in the sample.

# of Defects in Population	Probability of Exactly d Defects in Sample					
	$d = 0$	$d = 1$	$d = 2$	$d = 3$	$d = 4$	$\Pr_A[D \le d]$
$A = 89$	0.0001	0.0006	0.0031	0.0109	0.0279	0.0426
$A = 90$	0.0000	0.0005	0.0029	0.0101	**0.0261**	0.0396
$A = 91$	0.0000	0.0005	0.0026	0.0093	0.0245	0.0369
$A = 92$	0.0000	0.0004	0.0024	0.0086	0.0229	0.0343
$A = 93$	0.0000	0.0004	0.0022	0.0079	0.0214	0.0319
$A = 94$	0.0000	0.0003	0.0020	0.0073	0.0200	0.0296
$A = 95$	0.0000	0.0003	0.0018	0.0068	0.0186	0.0275
$A = 96$	0.0000	0.0003	0.0016	0.0062	0.0174	**0.0255**
$A = 97$	0.0000	0.0003	0.0015	0.0057	0.0162	0.0237

14. According to the procedure in Exhibit KEJ-1, we should look in the column labeled $d = 4$ for the last row such that the tabled probability exceeds 0.025. That occurs for the value 0.0261 (in bold), in the row labeled $A = 90$. Consequently, Dr. Johnson's procedure yields an upper confidence limit of 90 for the number of defects in the universe, or equivalently an upper confidence bound of 9.0% for the defect rate.

15. To determine the correct upper confidence limit, we must look instead at the last column of the table, which shows the cumulative probability of observing 4 *or fewer* defects in a sample of size 90. Because this cumulative probability exceeds 0.025 through the row with $A = 96$, the correct confidence interval extends to 9.6%—a substantially higher value than that computed by Dr. Johnson's formula.

[3] The formula is the one shown in KEJ-1 with A substituted for d_u; that is,

$$\Pr_A[D = d] = \frac{C(A,d)C(N-A,n-d)}{C(N,n)}$$

16. A similar correction is required for Dr. Johnson's lower confidence limit, resulting in values that are lower than he would compute. Consequently, the sample sizes selected by BellSouth do not produce the degree of certainty that they were intended to achieve.

17. A recently opened observation in the Florida test also confirms that BellSouth's methodology for calculating SOA results produces biased results in BellSouth's favor. In Observation 178, KPMG reports that, "BellSouth adjusts the sample size when the results have higher variance than allowed by the benchmark standards, as stated by the SQM definition. Since the variance increases with the BellSouth error rate, this results in the selection and evaluation of more service orders only when BellSouth is doing poorly." KPMG Florida Observation 178, dated April 1, 2002 (attached hereto as Exhibit 1). KPMG concludes that because "[t]his method has the potential for producing biased samples for calculating the 'Provisioning: Service Order Accuracy' SQM, the reported values would not accurately reflect the quality of service provided." *Id.*

18. In its response to Observation 178, BellSouth does not deny that it adjusts sample sizes when its results are poor, but instead contends that doing so does not bias results. BellSouth states that "[i]f additional sampling of the current month is undertaken, it offers no advantage to BellSouth other than to increase the certainty of the measure." BellSouth's Response to Observation 178, dated April 3, 2002 at 2 (attached hereto as Exhibit 2). BellSouth's contention is simply wrong as the following example illustrates.

19. Assume that the final exam for a course consists of tasks that the students try to perform. The instructor writes two exams of equal difficulty, each consisting of five tasks. The score on either exam is the percentage of tasks completed successfully. Assume further that the instructor offers each student two options: (1) the student may take one exam (chosen at

random) in the morning, or (2) the student may take one exam in the morning, one in the afternoon, and average the two scores. The student must decide before seeing the morning exam.

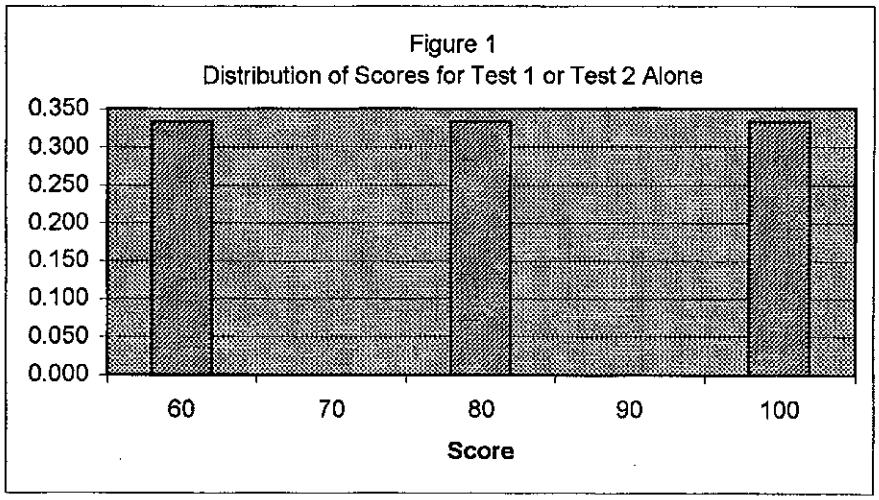
20. Assume that Mary is equally likely to score 60, 80, or 100 on either of the two exams. Her score distribution is shown in Figure 1. Obviously, her expected (average) score is 80 for either exam. Also, assume that if she takes both exams, her score on the second exam is independent of her score on the first exam. In that case, Mary's score distribution (the average of the two exams) is shown in Figure 2. From the symmetry of Figure 2, it is clear that her expected score on both tests combined is also 80. If Mary chooses to take both exams, she reduces the probability of scoring 60, but she also reduces the chance of scoring 100. Since she has the same expected score under either scenario, her decision is likely to depend on how risk averse she is.

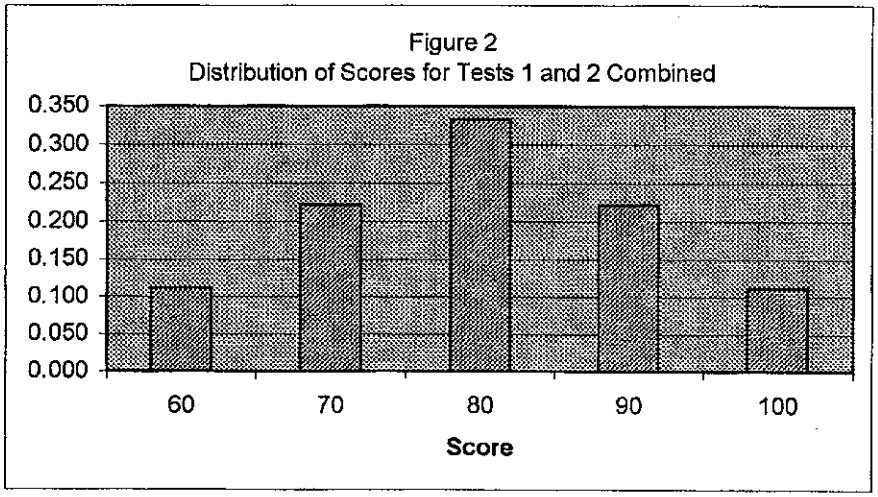
21. Assume, instead, that Mary is allowed to decide whether to take the afternoon exam *after* seeing her score from the morning. If she scores 100 in the morning, Mary will obviously take the afternoon off because she can only lose by taking the second exam. If she scores just 60, she will take the second exam, realizing that she probably has more to gain than to lose. If she scores 80, taking the second exam is equally likely to help or hurt her. For simplicity, assume that she would not take the second exam.

22. Figure 3 shows the distribution of Mary's scores if she takes the second exam only after scoring 60 in the morning. Her expected score in this case equals 83.33 points. Setting aside whether this procedure is a fair way to grade the course, it is clear that it produces biased estimates for the students' true abilities.

23. BellSouth's procedure for sampling service orders works in the same way. BellSouth's methodology allows BellSouth to keep good results from the initial sample and to "average in a make-up" when the initial results are poor. KPMG is correct that the BellSouth

sampling procedure is biased in favor of BellSouth. Because BellSouth's samples are biased for individual product classifications, BellSouth's claim that this problem cannot bias the overall error rate is obviously incorrect.





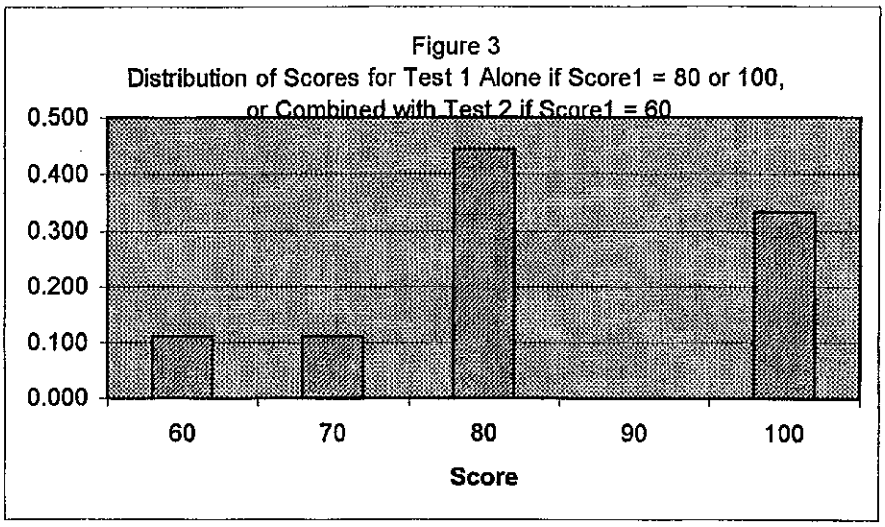


Figure 3
Distribution of Scores for Test 1 Alone if Score1 = 80 or 100,
or Combined with Test 2 if Score1 = 60
0.500
0.400
0.300
0.200
0.100
0.000
60
70
80
90
100
Score

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

Robert M. Bell

Executed on April 19, 2002

EXHIBIT 1

KPMG Consulting

OBSERVATION 178

BellSouth Florida OSS Testing Evaluation

Date: April 01, 2002

OBSERVATION REPORT

An observation has been identified as a result of the Metrics Definitions and Standards Development and Documentation Verification and Validation Review. (PMR2)

Observation:

KPMG Consulting has found that BellSouth's method of sampling records used for the calculation of the "Provisioning: Service Order Accuracy" Service Quality Measurement (SQM) may produce biased estimates.

Background:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting has reviewed the *Florida Interim Performance Metrics* document.[1] KPMG Consulting evaluates the accuracy, completeness, and consistency of each metric's stated definition, calculation and business rules.

Issue:

BellSouth adjusts the sample size when the results have higher variance than allowed by the benchmark standards, as stated by the SQM definition. Since the variance increases with the BellSouth error rate, this results in the selection and evaluation of more service orders only when BellSouth is doing poorly.[2] In effect, this procedure gives BellSouth an additional opportunity for a favorable result only in instances where BellSouth is failing. In the cases where sample size is adjusted, the resulting estimate of service order accuracy will be biased.

Impact:

This method has the potential for producing biased samples for calculating the "Provisioning: Service Order Accuracy" SQM, the reported values would not accurately reflect the quality of service provided.

[1] KPMG Consulting used the June 1, 2001, version 3.00 of the *Florida Interim Performance Metrics* document as a basis to perform this test. The Business Rules listed in this Observation are listed in the *Florida Interim Performance Metrics* document published in June 2001.

[2] The bias is always in favor of BellSouth, unless the error rate exceeds 50%. On conference calls between BellSouth and KPMG Consulting held during the week of February 11, 2002, BellSouth stated that the error rate was never that high.

EXHIBIT 2

FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION 178

BELLSOUTH

Florida OSS Test
Observation 178

April 3, 2002

OBSERVATION REPORT

An observation has been identified as a result of the Metrics Definitions and Standards Development and Documentation Verification and Validation Review. (PMR2)

Observation:

KPMG Consulting has found that BellSouth's method of sampling records used for the calculation of the "Provisioning: Service Order Accuracy" Service Quality Measurement (SQM) may produce biased estimates.

Background:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting has reviewed the *Florida Interim Performance Metrics* document.[1] KPMG Consulting evaluates the accuracy, completeness, and consistency of each metric's stated definition, calculation and business rules.

Issue:

BellSouth adjusts the sample size when the results have higher variance than allowed by the benchmark standards, as stated by the SQM definition. Since the variance increases with the BellSouth error rate, this results in the selection and evaluation of more service orders only when BellSouth is doing poorly.[2] In effect, this procedure gives BellSouth an additional opportunity for a favorable result only in instances where BellSouth is failing. In the cases where sample size is adjusted, the resulting estimate of service order accuracy will be biased.

Impact:

This method has the potential for producing biased samples for calculating the "Provisioning: Service Order Accuracy" SQM, the reported values would not accurately reflect the quality of service provided.

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[1] KPMG Consulting used the June 1, 2001, version 3.00 of the *Florida Interim Performance Metrics* document as a basis to perform this test. The Business Rules listed in this Observation are listed in the *Florida Interim Performance Metrics* document published in June 2001.

[2] The bias is always in favor of BellSouth, unless the error rate exceeds 50%. On conference calls between BellSouth and KPMG Consulting held during the week of February 11, 2002, BellSouth stated that the error rate was never that high.

FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION 178

BellSouth Response:

Future sample sizes are increased when error rates increase solely to insure that the objective confidence interval of ?5% is maintained. Since the likelihood of overstating or understating the actual error rate in the universe is not a function of the sample size, no bias is introduced. In fact, the larger sample sizes for universes with larger error rates reduce bias by giving a greater degree of certainty for the measure. If additional sampling of the current month is undertaken, it offers no advantage to BellSouth other than to increase the certainty of the measure.

Since the SOA measure is done by product type, each universe stands alone. The overall error rate is calculated as an additional indicator of accuracy, even though it is not part of the measurement plan. Since the overall error rate is calculated as a weighted average, the number of SOs sampled for each universe is not a factor.

RF-1870
(5/98)

BELLSOUTH Change Request Form

Internal Reference # _____ (1) Date Change Request Submitted 8/12/99 (2)
[X] CLEC [ ] BST (3) Company Name _____ (4)
CCM Jill Williamson (5) Phone 404-810-8562 (6)
CCM Email Address jrwilliamson@att.com (7) Fax 404-810-8605 (8)
Alternate CCM _____ (9) Alternate Phone _____ (10)
Originator's Name Jill Williamson (11) Phone 404-810-8562 (12)
Title of Change 411 Drop-out (13)

Category: [X] Add New Functionality [ ] Desired Due 10/1/99 (15)
Originating CCM assessment of impact [ ] [X] Minor [ ] None expecte(16)
Originating CCM assessment of priority [X] [ ] High [ ] Medium [ ] Low (17)

Interfaces Impacted (18)

[ ] Pre-Ordering	[X] Ordering	[ ] Maintenance
[ ] LENS	[X] EDI	[ ] TAFI
[ ] LPOG	[X] LENS	[ ] EC-TA Local
	[X] TAG	

Type Of Change - Check one or more, as applicable (19)

[ ] Software	[ ] Hardware	[ ] Industry Standards
[ ] Product & Services	[ ] New or Revised Edi	[X] Process
[ ] Documentation	[ ] Regulatory	[ ] Other

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)
In the current environment, when a customer's listing "drops out" of 411/DA, BellSouth requires that CLEC's fax a new LSR to BellSouth to correct the drop out regardless of whether the fall-out is caused by BellSouth or the CLEC. AT&T agrees that when the drop out is caused by the CLEC, a new LSR should be sent. However, when the fall out is caused by BellSouth, a CLEC should not have to send a LSR. AT&T requests that BellSouth adopt its 411 drop out form as an interim solution when the drop out is caused by BellSouth and work jointly to develop an acceptable process for future use and propose our jointly developed form/process to OBF. Because AT&T has nothing to "correct" on that customer's service, it's systems cannot (and should not) generate a new LSR with no changes.

Known dependencies (21)

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

AT&T's proposed form is attached.

RF-1870
(5/98)

BELLSOUTH

Change Request Form

This Section to be completed by BCCM only.

Change Request Log # CR0364 (formerly EDI0812990003) (23) Clarification [ ] Yes [X] No (24)

Clarification Request Sent _____ Clarification Response Due _____ (26)

Status I (27)

Enhancement Review Date 9/28/99 (1st) 6/28/00 (2nd) (2Target Implementation Date **7/1/02** (29)

Last Modified By BCCM (30) Date Modified 7/1/02 (31)

Review Results (32)
Note: BST agrees that when a listing falls out of 411/DA due to BST error that an LSR should not have to be submitted by the CLEC. BST will be glad to review the form that ATT proposes to be used as an interim solution to the problem and advise if we agree to use it.

09/18/00 - The process for handling 411 drops will be documented and provided to the CLEC community. If a listing drops out of 411/DA, the CLEC should call the LCSC to report the drop. The LCSC retrieves the LSR to investigate cause of error. If determined to be a BST error, it is corrected immediately, no additional paperwork is required. If CLEC error, CLEC will need to resubmit LSR. Change Control is in the process of investigating a standard process for CLECs to use to report 411 drops in batch, if they do not wish to call the LCSC.

09/22/00 - A form for CLECs to use to report 411 drops in batch will be presented at the 10/25/00 Monthly Status meeting. BST is pursuing the possibility of implementing an electronic solution in Release 9.0.

10/25/00 - Documented process for reporting 411 drops and a standard form for submitting drops in batch was presented and discussed at the 10/25/00 Monthly Status Meeting. Updates to the form will be discussed at the 11/15/00 Monthly Status Meeting in addition to when the form can be implemented.

11/6/00 - The electronic solution for reporting 411 drops will not be included in the Release 9.0 scope. This issue to be addressed at the 11/15/00 Monthly Status Meeting.

11/15/00 - Revised form discussed during Monthly Status Meeting. The standard form for reporting multiple drops is targeted for implementation 2/01/01. An electronic solution for handling 411 drops has been investigated. LENS cannot accommodate this feature because it is designed to only handle information off of the LSR. BellSouth is exploring having one center to email the form to.

12/13/00 - The standard form for reporting multiple drops is targeted for implementation 2/01/01. BST is pursuing a single point to email/call to report drops. An update to be provided at January Monthly Status Meeting.

1/26/01 - Revised 411 listing drop form distributed to CLEC community. Primary change to the

process is the removal of the requirement that the CLECs call the LCSC before they fax the form in. Target date for implementation of the standard form has been changed from 2/01/01 to 3/01/01 due to internal process issues.

2/19/01 - Target implementation date for the standard form changed from 3/01/01 to 4/01/01. Additional time required to develop the supporting processes and procedures.

3/15/01 - Status changed to "P1" to reflect this request has cycled through the process two times.

3/26/01 - The 4/1/01 target date for implementing the standard form has changed. The new target date is being determined. Additional time required to develop the supporting processes and procedures.

4/30/01 - AT&T advised not to prioritize this CR. The standard form for reporting multiple drops and email option would be acceptable solution.

5/16/01 - New target implementation date for standard 411 drop form is 8/1/01.

7/25/01 - Target implementation date extended to 4Q01. More time needed than anticipated to complete the supporting processes and procedures.

8/28/01 - Moved to "Candidate Request" status until a firm release date is available.

12/7/01 - Target implementation date extended to 2002. Entry & tracking mechanism under development.

3/19/02 - Scheduled for implementation on 6/1/02.

4/23/02 - Update to 3/19/02 status. The Carrier Notification Letter will be posted by 6/1/02. The standard form and process will be effective 30 days later, 7/1/02.

5/30/02 Carrier Notification Letter SN91083041 posted 5/15/02 regarding New Form RF3981 - "End User Listing Dropped From the BellSouth Directory Assistance (DA) Database Multiple-Listing Log". Form RF3981 will be available for use effective July 1, 2002 at the BellSouth Interconnection Services' Web site located at: www.interconnection.bellsouth.com/forms/html/lec_form.html

Instructions are included in the three-page form and should be used to request an investigation of listings that have dropped from BellSouth's Directory Assistance Database.

7/01/02 CR0364 implemented. Form RF3981 can be downloaded and faxed to the appropriate LCSC center.

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

Cancellation Acknowledgment CLEC _____ BST _____ Date _____ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Consideration (36)

_____

_____

_____

Agreed Release Date _____ (37)

Change Control Process Back Log

Overall Feature Change Request Back Log 5/29/02[1]

Change Request Status	Number of Change Requests in Back Log	Submission Date of "Oldest" Request in Back Log
New	5	12/00
Pending	5	4/00
Candidate Request	42	3/00
Scheduled	13	8/99
Total	65	

New – Indicates a Change Request has been received by the BellSouth Change Control Manager ("BCCM") but has not been validated. The interval for validation is 10 business days.

Pending – Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review and prioritization. Change Review occurs at each monthly status meeting, prioritization occurs in March, June, August and December.

Candidate Request – Indicates a Change Request has completed the Change Review and prioritization process and is ready to be scheduled to a release.

Scheduled – Indicates a Change Request has been scheduled for a release.

[1] All information summarized here was obtained from the BellSouth Change Control Log provided to the CLECs by e-mail on May 29, 2002 and reflects the implementation of Release 10.5 on June 1-2, 2002.

Change Control Process Back Log

New Status Back Log Detail

New – Indicates a Change Request has been received by the BellSouth Change Control Manager ("BCCM") but has not been validated. The interval for validation is 10 business days.

Change Request #	Type	Submission Date
245	5	12/15/00
789	5	5/17/02
790	5	5/16/02
793	5	5/23/02
794	5	5/23/02
TOTAL = 5	Type 5 = 5 Type 4 = 0	

Type 4 = BellSouth Initiated
Type 5 = CLEC Initiated
Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

8 New Status Change Requests listed in the Change Request Log were excluded from this analysis because they were either still "new" because of CLEC inactivity or were requesting changes to the CCP.

Change Control Process Back Log

Pending Status Back Log Detail

Pending – Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review and prioritization. Per the CCP Change Review occurs at each monthly status meeting, prioritization occurs in March, June, August and December. The most recent prioritization occurred on May 22, 2002.

Change Request #	Type	Submission Date	Status Date
12	5/2	4/00	4/02
404	5	5/01	3/02
505	2 [FTTF]	9/01	3/02
654	5	2/02	4/02
688	2 [FTTF]	3/02	3/02
Total = 5	Type 5 = 3 Type 2 = 2		

Type 4 = BellSouth Initiated
Type 5 = CLEC Initiated
Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)
FTTF = Flow Through Task Force

2 Pending Status Change Requests listed in the Change Request Log were excluded from this analysis because they were requesting changes to the CCP or were for the implementation of the next Industry Standard Release (ELMS-6).

Change Control Process Back Log

Candidate Request Status Back Log Detail

Candidate Request – Indicates a Change Request has completed the Change Review and prioritization process and is ready to be scheduled to a release. The most recent prioritization occurred on May 22, 2002.

Change Request #	Type	Submission Date	Status Date
3	5/2	3/00	4/01
85	4	6/00	4/01
88	5/2	6/00	4/01
101	5	7/00	4/01
104	5	7/00	4/01
113	5	7/00	4/01
127	5	8/00	4/01
135	5	8/00	4/01
176	5	9/00	4/01
178	4	9/00	4/01
179	4	9/00	4/01
184	5	9/00	5/02
186	5	9/00	4/01
221	4	12/00	4/01
246	5	12/00	5/02
273	5/2 [FTTF]	1/01	4/01
284	5	1/01	5/02
335	2 [FTTF]	3/01	4/02
336	4	3/01	4/01
367	5	8/99	4/01
392	5	5/01	5/02
408	4	5/01	5/02
439	4	7/01	5/02
440	4	7/01	5/02
443	5	6/01	5/02
466	5	8/01	5/02
495	2 [FTTF]	9/01	4/02
496	2 [FTTF]	9/01	4/02
506	2 [FTTF]	9/01	4/02
518	2 [FTTF]	10/01	4/02
563	2 [FTTF]	12/01	4/02
622	2 [FTTF]	1/02	4/02
625	2 [FTTF]	1/02	4/02
629	5	1/02	5/02
652	5	2/02	5/02
674	2 [FTTF]	2/02	4/02
675	5	2/02	5/02
676	5	2/02	5/02
690	5	3/02	5/02

Change Control Process Back Log

726	2 [FTTF]	7/01	4/02
728	2 [FTTF]	7/01	4/02
729	2 [FTTF]	7/01	4/02
Total = 42	Type 5 = 22 Type 4 = 8 Type 2 = 12		

Type 4 = BellSouth Initiated
Type 5 = CLEC Initiated
Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)
FTTF = Flow Through Task Force

Change Control Process Back Log

Scheduled Status Back Log Detail

Scheduled – Indicates a Change Request has been scheduled for a release.

Change Request #	Type	Submission Date	Status Date	Target Date	Interval (Months -1)
29	5/2	5/00	2/02	8/02	26
40	5	5/00	1/02	12/02	30
160	2 [FTTF]	8/00	3/02	8/02	23
196	4	10/00	2/02	8/02	21
215	5	11/00	2/02	12/02	24
228	2 [FTTF]	12/00	2/02	12/02	23
241	5	12/00	2/02	8/02	19
364	5	8/99	3/02	8/02	34
492	2 [FTTF]	9/01	2/02	12/02	14
541	5/2	11/0	5/02	8 & 12/02	11
707	2	3/02	3/02	8/02	4
725	2 [FTTF]	7/01	5/02	8/02	12
756	4/2/6	4/02	5/02	8/02	3
Total = 13	Type 5 = 6 Type 4 = 2 Type 2 = 5				

Type 4 = BellSouth Initiated
Type 5 = CLEC Initiated
Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)
FTTF = Flow Through Task Force

Change Control Process Back Log

Overall Defect Change Request Back Log
5/29/02[1]

Change Request Status	Number of Change Requests in Back Log	Submission Date of "Oldest" Request in Back Log
New	0 (5)	11/27/01
Pending Clarification	0 (6)	12/28/01
Validated	21	9/1/00
Scheduled	11	9/10/01
Total	32	

New – Indicates a Defect Change Request has been received by the BellSouth Change Control Manager ("BCCM") and the change request form validated for completeness.

Pending Clarification – BellSouth has asked the originator of the change request for additional input regarding the request.

Validated – Indicates internal analysis has been conducted and it is determined that it is a validated defect.

Scheduled – Indicates a Defect Change Request has been scheduled for a release.

[1] All information summarized here was obtained from the BellSouth Change Control Log provided to the CLECs by e-mail on May 29, 2002 and the June 11, 2002 BellSouth Daily Change Request Activity Report. All documentation defects and defect change requests in "new" status because of CLEC inactivity have been excluded from this analysis.

Change Control Process Back Log

New Defect Status Back Log Detail

New – Indicates a Defect Change Request has been received by the BellSouth Change Control Manager ("BCCM") and the change request form validated for completeness.

Change Request #		Submission Date
588*		11/27/01
656*		2/12/02
708*		3/18/02
712**		3/22/02
771*		5/10/02
Total = 0		

* Each of these CRs carries the following note in the log "Determined to not be a defect. Waiting on originator to authorize closure." They have not been counted as back log.

** This CR carries the following note in the log "Determined to not be a defect. This request would constitute a feature, however, is being addressed in the TAG transformation effort. It has not been counted as back log.

Change Control Process Back Log

Pending Clarification Defect Status Back Log Detail

Pending Clarification – BellSouth has asked the originator of the change request for additional input regarding the request. CRs in this status are not counted as back log.

Change Request #		Submission Date
581		12/28/01
584		1/4/02
641		2/1/02
735		4/8/02
751		4/16/02
792		5/21/02
Total = 0		

Change Control Process Back Log

Validated Defect Status Back Log Detail

Validated – Indicates internal analysis has been conducted and it is determined that it is a validated defect.

Change Request #		Submission Date
151		9/1/00
222		11/13/00
277		1/18/01
351		3/29/01
531		10/25/01
555		11/15/01
621		1/17/02
743		4/12/02
757		4/26/02
758		4/29/02
779		5/13/02
780		5/16/02
795		5/28/02
801		5/31/02
810		6/5/02
811		6/5/02
812		6/6/02
813		6/6/02
820		6/10/00
823		6/11/02
824		6/11/02
Total = 21		

Change Control Process Back Log

Scheduled Defect Status Back Log Detail

Scheduled – Indicates a Defect Change Request has been scheduled for a release.

Change Request #	Submission Date	Status Date	Target Date	Interval (Days)
339	3/14/01	9/10/01	8/24/02	412
682	3/6/02	4/3/02	8/24/02	165
693	3/12/02	5/6/02	8/24/02	159
704	3/15/02	3/15/02	8/24/02	156
730	4/3/02	4/26/02	8/24/02	136
743	4/11/02	4/26/02	8/24/02	128
753	4/23/02	4/23/02	8/24/02	116
766	5/3/02	5/3/02	8/24/02	106
769	5/7/02	5/7/02	8/24/02	102
788	5/20/02	5/20/02	12/7/02	200
800	5/31/02	5/31/02	8/24/02	78
Total = 11				

Change Control Process Back Log

2002 Implementation Analysis[1]

Implemented and Scheduled CR Implementations for 2002				
Feature Changes in Releases Implemented Through June 2, 2002	25		Defect Changes in Releases Implemented Through June 2, 2002	83
Feature Changes Scheduled in Releases Through Year End	12		Defect Changes Scheduled in Releases Through Year End	10
Total Feature Changes in 2002 Releases	37*		Total Defect Changes in 2002 Releases	93**

* CR's 0040 and 0541 are being implemented in phases. In the detail sheets following each phase is listed. In this summary each is counted only once.

** Defect CRs are also implemented independent of releases. See separate defect analysis for the total of defect CRs implemented.

Seven documented releases have occurred through June 2, 2002. Two more are planned through year end.

BellSouth has announced that there is no spare capacity for additional CR implementations in either of the two remaining releases planned for 2002.

[1] All information summarized here was obtained from the BellSouth Release Implementation Schedule information provided to the CLECs by e-mail on May 31, 2002. All documentation implementations have been excluded from this analysis.

Change Control Process Back Log

2002 Implementation Analysis[2]

	Release 10.3 Implemented January 5, 2002	Release 10.3.a Implemented January 11, 2002	Release 10.3.1 Implemented February 2, 2002
Number of Features	5	0	5 (4)
Submission Date of "Oldest" Request	8/99		12/99
Number of Defects	11	1	21
Submission Date of "Oldest" Request	8/15/01	1/9/02	8/15/01

	Release 10.3.2 Implemented February 9, 2002	Release 10.4 Implemented 3/23/02	Release 10.4.1 Implemented 3/28/02
Number of Features	0	7 (6)	0
Submission Date of "Oldest" Request		4/00	
Number of Defects	2	17	4
Submission Date of "Oldest" Request	10/12/01	11/15/01	3/18/02

	Release 10.5 Implemented June 1, 2002	Release 10.6 Scheduled for August 24, 2002	Release 11.0 Scheduled for December 7, 2002
Number of Features	11 (10)	8 (7)	5
Submission Date of "Oldest" Request	8/99	5/00	5/00
Number of Defects	27	9	1
Submission Date of "Oldest" Request	8/21/01	3/15/01	5/20/02

[2] All information summarized here was obtained from the BellSouth Release Implementation Schedule information provided to the CLECs by e-mail on May 31, 2002. All documentation implementations have been excluded from this analysis.

Change Control Process Back Log

Details of Release 10.3 Implemented on January 5, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
229	Feature / (4)	11/00	13 months
369	Feature / (5/2)	8/99	28
409	Feature / (2/4)	5/01	7
422	Feature / (2/4)	6/01	6
441	Feature / (2)	7/01	5
459	Defect	8/15/01	141days
527	Defect	10/19/01	78
530	Defect	10/25/01	72
532	Defect	10/25/01	72
536	Defect	10/31/01	66
537	Defect	10/31/01	66
540	Defect	11/5/01	60
542	Defect	11/6/01	59
570	Defect	12/7/01	29
571	Defect	12/7/01	29
573	Defect	12/12/01	24

Details of Release 10.3.A Implemented on January 11, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
602	Defect	1/9/02	2 days

Change Control Process Back Log

Details of Release 10.3.1 Implemented on February 2, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
40	Feature / (5)	5/00	20 months
133	Feature / (5/2)	8/00	17
371	Feature / (5)	12/99	25
557	Feature / (2)	11/01	2
606	Feature / (4)	1/02	1
459	Defect	8/15/01	169 days
498	Defect	9/24/01	130
580	Defect	12/21/01	43
588*	Defect	1/9/01	24
589*	Defect	1/9/01	24
590*	Defect	1/9/01	24
591*	Defect	1/9/01	24
592*	Defect	1/9/01	24
593*	Defect	1/9/01	24
594*	Defect	1/9/01	24
595*	Defect	1/9/01	24
596*	Defect	1/9/01	24
597*	Defect	1/9/01	24
598*	Defect	1/9/01	24
599*	Defect	1/9/01	24
600*	Defect	1/9/01	24
601*	Defect	1/9/01	24
608	Defect	1/11/01	22
610*	Defect	1/11/02	22
612	Defect	1/16/02	17
626	Defect	1/25/02	8

* These requests are to implement corrections to defects in BellSouth's implementation of the parsed customer service record. BellSouth has labeled these defects as being "low impact". Despite their classification these defects were implemented in advance of outstanding defects with greater impact and submitted earlier.

Change Control Process Back Log

Details of Release 10.3.2 Implemented on February 9, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
520	Defect	10/12/01	120 days
643	Defect	2/4/02	5

Details of Release 10.4 Implemented on March 23, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
Single C	Feature (2)	10/01	5 months
16	Feature (5)	4/00	22
40	Feature (5)	5/00	21
96	Feature (5)	6/00	20
137	Feature (5/2)	8/00	18
651	Feature (5/6)	2/02	1
657	Feature (2)	2/02	1
547	Defect	11/15/01	126 days
585	Defect	1/7/02	74
611	Defect	1/16/02	66
620	Defect	1/17/02	65
627	Defect	1/28/02	54
628	Defect	1/28/02	54
632	Defect	1/30/02	52
633*	Defect	1/31/01	51
634*	Defect	1/31/01	51
635*	Defect	1/31/01	51
636*	Defect	1/31/01	51
637*	Defect	1/31/01	51
638*	Defect	1/31/01	51
639*	Defect	1/31/01	51
658	Defect	2/12/02	39
681	Defect	3/6/92	17
703*	Defect	3/15/02	8

* These requests are to implement corrections to defects in BellSouth's implementation of the parsed customer service record. BellSouth has labeled these defects as being "low impact". Despite their classification these defects were implemented in advance of outstanding defects with greater impact and submitted earlier.

Change Control Process Back Log

Details of Release 10.4.1 Implemented on March 28, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
706	Defect	3/18/02	10 days
713	Defect	3/26/02	2
715	Defect	3/27/02	1
716	Defect	3/25/02	3

Details of Release 10.5 Implemented on June 1, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
20	Feature (5)	5/00	24 months
38	Feature (4)	5/00	24
40	Feature (5)	5/00	24
78	Feature (5/2)	6/00	23
145	Feature (4)	8/00	21
146	Feature (4)	8/00	21
365	Feature (5)	8/99	33
368	Feature (5)	8/99	33
461	Feature (2)	8/01	9
494	Feature (2 – FTTF)	9/01	8
557	Feature (2 – FTTF)	11/01	6
471	Defect	8/21/01	295 days
472	Defect	8/21/01	295
473	Defect	8/21/01	295
535	Defect	10/31/01	224
574	Defect	12/13/01	181
586	Defect	1/7/02	145
618	Defect	1/17/02	135
642	Defect	2/4/02	117
668	Defect	2/15/02	106
678	Defect	3/4/02	89
679	Defect	3/5/02	88
682	Defect	3/6/02	87
692	Defect	3/11/02	82
697	Defect	3/13/02	80
705	Defect	3/15/02	78

Change Control Process Back Log

724	Defect	4/3/02	59
737	Defect	4/9/02	53
739	Defect	4/10/02	52
740	Defect	4/10/02	52
741	Defect	4/10/02	52
744	Defect	4/11/02	51
745	Defect	4/11/02	51
767	Defect	5/7/02	25
770	Defect	5/7/02	25
774	Defect	5/13/02	19
781	Defect	5/16/02	16
787	Defect	5/17/02	15

Details of Release 10.6 Scheduled for August 24, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
29	Feature (5/2)	5/00	26 months
160	Feature (2 – FTTF)	8/00	23
196	Feature (4)	10/00	21
241	Feature (5)	12/00	19
541	Feature (5/2)	11/01	9
707	Feature (2)	3/02	4
725	Feature (2 – FTTF0	7/01	12
756	Feature (4/2/6)	4/02	3
339	Defect	3/15/01	412 days
682	Defect	3/6/02	165
693	Defect	3/12/02	159
704	Defect	3/15/02	156
730	Defect	4/3/02	136
743	Defect	4/11/02	128
753	Defect	4/23/02	116
769	Defect	5/7/02	102
800	Defect	5/31/02	78

Change Control Process Back Log

Details of Release 11.0 Scheduled for December 7, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
40	Feature (5)	5/00	30 months
215	Feature (5)	11/00	24
228	Feature (2 – FTTF)	12/00	23
492	Feature (2 – FTTF)	9/01	14
541	Feature (5/2)	11/01	12
788	Defect	5/20/02	200 days

REQUEST: Bellsouth states in a May 14, 2002 Ex Parte, in FCC Docket No. 02-35, "Assuming no industry release in calendar year 2003, the CLECs could see at least 80% of the existing change request backlog eliminated." Please provide all documentation and analysis that supports that statement, including each change request, by change request number, that BellSouth used in its analysis.

RESPONSE:

BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

To arrive at the 80% figure quoted above, BellSouth analyzed the information that is bulleted below. BellSouth recently provided CLECs with a proprietary projection of capacity for upcoming releases in "UNITs." One UNIT is equal to 100 Release Cycle Hours, as defined in Change Control Process documentation, effective March 15, 2002, Appendix H, entitled "Preliminary Feature Sizing Model."

RESPONSE: (Cont.)

The formula for this analysis is based upon a conversion of the existing CLEC initiated and Regulatory change requests into an estimation of the UNITs of capacity required to implement each change request. BellSouth found:

- 1256 UNITs were estimated to be available in CLEC Production Releases for the reduction of the number of existing Change Requests, assuming no industry release in 2003.
- BellSouth estimated that Type 2 Flow-through change requests would require 998 UNITs of capacity.
- Additionally, BellSouth estimated that Type 5 change requests (CLEC initiated) would require 583 UNITs of capacity.
- 998 Type 2 +583 Type 5= 1581 UNITs required to reduce the total estimated change requests, as reflected on the attached spreadsheets.
- 1256/1581 = 79% (BellSouth divided 1256 UNITs (total CLEC production release UNITs under the option that did not include an industry release) by 1581 total UNITs needed to reduce all of the existing estimated change requests, as of May 14, 2002, and arrived at 79%.)

Therefore, BellSouth concluded that approximately 80% of the existing change requests could be reduced in 2003.

Attached are 2 spreadsheets that provide the change request numbers for Type 2 and Type 5 change requests and the required UNITs for each that were utilized in this analysis. The documents were provided to the CLECs via email on May 15, 2002. On May 16, 2002 a meeting was held with the CLECs to question and clarify the 2003 Capacity Planning Estimate and Release Option documents that were mailed. Based on the feedback received from the May 16th meeting, BellSouth updated the 2003 Capacity Release Plan for discussion in the May 22, 2002 Change Review Meeting. Individual Change Requests can be viewed at BellSouth's Interconnection website at:
http://interconnection.bellsouth.com/markets/lec/ccp_live/ccp_cha_req.html

RESPONSE:

As noted above, BellSouth's analysis was based upon a scenario that assumed no industry release in 2003. However, on June 6, 2002, Change Control emailed the attached ballot tally results to the CLECs indicating that the CLEC community voted in favor of BellSouth's implementation of an industry release in 2003. The CLECs have chosen a scenario, as provided in the May 14, 2002 Ex Parte, that will make less UNITs available to reduce the existing change requests.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
Consolidated CLEC 1st Data Requests
May 23, 2002
Item No. 10
ATTACHMENT

PROPRIETARY

CCP Release Plan

5/15/02

CCP Deliverables based on Release Options A&B

Activity	CLEC Production Release	BST Production Release	BST Production Release (Predominantly Infrastructure)	Maintenance Release	Industry
Release Package Meeting	Minimum 36 Weeks before production	Minimum 36 Weeks before production	Minimum 36 Weeks before production		Minimum 60 Weeks before production
Draft Requirements provided to CLECs	Minimum 34 Weeks before production	Minimum 34 Weeks before production	Minimum 34 Weeks before production		Minimum 60 Weeks before production
CCP Final User Requirements provided to CLECs	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		15 Weeks before Production
Carrier Letter for the date of the update of the BBR	30 days before the BBR is published	30 days before the BBR is published	30 days before the BBR is published		30 days before the BBR is published
Carrier Letter for CAVE Release Deployment (If applicable)	30 days before the CAVE Pre-Soak Test Window	30 days before the CAVE Pre-Soak Test Window	30 days before the CAVE Pre-Soak Test Window		30 days before the CAVE Pre-Soak Test Window
Carrier Letter for Production Release Deployment	30 days before Production	30 days before Production	30 days before Production	30 days before Production	30 days before Production
Publish the BBR and LEO IG	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		19 Weeks before Production
Publish the Coding Matrix	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		19 Weeks before Production
Publish TAG Reference Guide and TAG API Version 0	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		19 Weeks before Production
Publish TAG Reference Guide and TAG API Version 1	1 Day before Production	1 Day before Production	1 Day before Production		1 Day before Production
Publish EDI Specification	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		19 Weeks before Production
Pre Soak CAVE	45 Business Days before Production	45 Business Days before Production	45 Business Days before Production		60 Business Days before Production
Post Soak CAVE	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	N/A	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window

CCP Release Plan Assumptions

- CLEC releases will be scoped based on CLEC prioritization and implementation constraints.
- Release schedule and scope will be baselined and under change control after the defined scoping phase for that release.
- NPA/NXX Releases may require modifications to the release plan.
- Infrastructure changes in BST production releases include migration of functionality from the current system platform to the Service Gate Gateway (SGG), Delivery Order Manager (DOM), Service Order Generator (SOG) Systems in accordance with future technology direction.

Option A: 2003 CCP Release Plan without an Industry Release

Activity	CLEC Production Release	BST Production Release	BST Production Release (Predominantly Infrastructure)	Maintenance Release
Scope	Type 2s, 6s, 5s, and (optional are 4s)	Type 2s, 6s, 4s, and (optional are 5s); Network Infrastructure	Network Infrastructure, Type 2s, 6s, 4s, and (optional are 5s)	Defects (includes Type 6s)
Tentative Implementation Dates	6/03, 10/03	8/03, 12/03	3/03	2/03, 4/03, 7/03, 9/03, 11/03
Capacity per release (units)	628	418.65	418.65	101.1
# Releases	2	2	1	5
Total Capacity(units)	1256	837.30	418.65	505.5
Length (from scoping to production implementation)	10 Months	10 Months	10 Months	4 Months
Release Package Meeting	Minimum 36 Weeks before production	Minimum 36 Weeks before production	Minimum 36 Weeks before production	
Draft Requirements provided to CLECs	Minimum 34 Weeks before production	Minimum 34 Weeks before production	Minimum 34 Weeks before production	
CCP Final User Requirements provided to CLECs	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production	
Carrier Letter for the date of the update of the BBR	30 days before the BBR is published	30 days before the BBR is published	30 days before the BBR is published	
Carrier Letter for CAVE Release Deployment (If applicable)	30 days before the CAVE Pre-Soak Test Window	30 days before the CAVE Pre-Soak Test Window	30 days before the CAVE Pre-Soak Test Window	
Carrier Letter for Production Release Deployment	30 days before Production	30 days before Production	30 days before Production	
Publish the BBR and LEO IG	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production	
Publish the Coding Matrix	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production	
Publish TAG Reference Guide and TAG API Version 0	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production	
Publish TAG Reference Guide and TAG API Version 1	1 Day before Production	1 Day before Production	1 Day before Production	
Publish EDI Specification	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production	
Pre Soak CAVE	45 Business Days before Production	45 Business Days before Production	45 Business Days before Production	
Post Soak CAVE	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	N/A

Option B: 2003 CCP Release Plan with an Industry Release

Activity	CLEC Production Release	BST Production Release	BST Production Release (Predominantly Infrastructure)	Maintenance Release	Industry
Cave Soak	45 Business Days	45 Business Days	45 Business Days	N/A	60 Business Days
Scope	Type 2s, 6s, 5s, and (optional are 4s)	Type 2s, 6s, 4s, and (optional are 5s); Network Infrastructure	Network Infrastructure, Type 2s, 6s, 4s, and (optional are 5s)	Defects (includes Type 6s)	Type 3 (i.e., ELMS6)
Tentative Implementation Dates	5/03	9/03	3/03	2/03, 4/03, 8/03, 10/03, 12/03	11/03
Capacity per release (units)	628	314	314	69.5	1400
# Releases	1	1	1	5	1
Total Capacity (units)	628	314	314	347.5	1400
Length (from scoping to production implementation)	10 Months	10 Months	10 Months	4 Months	18 Months
Release Package Meeting	Minimum 36 Weeks before production	Minimum 36 Weeks before production	Minimum 36 Weeks before production		Minimum 60 Weeks before production
Draft Requirements provided to CLECs	Minimum 34 Weeks before production	Minimum 34 Weeks before production	Minimum 34 Weeks before production		Minimum 60 Weeks before production
CCP Final User Requirements provided to CLECs	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		15 Weeks before Production
Carrier Letter for the date of the update of the BBR	30 days before the BBR is published	30 days before the BBR is published	30 days before the BBR is published		30 days before the BBR is published
Carrier Letter for CAVE Release Deployment (If applicable)	30 days before the CAVE Pre-Soak Test Window	30 days before the CAVE Pre-Soak Test Window	30 days before the CAVE Pre-Soak Test Window		30 days before the CAVE Pre-Soak Test Window
Carrier Letter for Production Release Deployment	30 days before Production	30 days before Production	30 days before Production	30 days before Production	30 days before Production
Publish the BBR and LEO IG	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		19 Weeks before Production
Publish the Coding Matrix	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		19 Weeks before Production
Publish TAG Reference Guide and TAG API Version 0	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		19 Weeks before Production
Publish TAG Reference Guide and TAG API Version 1	1 Day before Production	1 Day before Production	1 Day before Production		1 Day before Production

Option B: 2003 CCP Release Plan with an Industry Release cont'd

Activity	CLEC Production Release	BST Production Release	BST Production Release (Predominantly Infrastructure)	Maintenance Release	Industry
Publish EDI Specification	15 Weeks before Production	15 Weeks before Production	15 Weeks before Production		19 Weeks before Production
Pre Soak CAVE	45 Business Days before Production	45 Business Days before Production	45 Business Days before Production		60 Business Days before Production
Post Soak CAVE	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window	N/A	Until the next Release is loaded into CAVE in preparation for the next CAVE Soak window

Date: March 04, 2002

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the documentation and process verification review for Interface Development (PPR5).

Exception:

BellSouth fails to follow its software testing and quality processes. (PPR5).

Background:

BellSouth did not completely test code changes for Releases 10.2 and 10.3 prior to these releases going into production.

During KPMG Consulting's observation of BellSouth's 10.2 and 10.3 releases, it was noted that there were significant defects in the software when the releases were placed into the production environment. Specific defects included:

In Release 10.2:

CR 0540	LENS defect – random numbers for a specific NPA are not available on resale change orders
CR 0542	LEO to populate internal TC opt field with AY when submitted TC opt is NO
CR 0547	LMU unable to reserve specific cable and pair
CR 0548	REQTYP M LSR's auto-clarifying on MFB USOC's
CR 0556	TAG users not receiving SVC ORD, L ORD and NP ORD on FOC's intermittently
CR 0560	EDI Mercator software application map defect
CR 0570	EDI orders are receiving an invalid rejection
CR 0573	Status NA only being returned on DSL FOC
CR 0574	XDSL RESID defect for use of facilities
CR 0580	LENS users are unable to validate Address at a DPA location when issuing a C order.

In Release 10.3:

CR 0585	CFA Invalid Auto-Clarification
CR 0588 – CR 0602	Parsed CSR
CR 0610	Parsed CSR
CR 0611	Incorrect error message on auto-clarify
CR 0612	Incorrect notification for XDSL
CR 0618	RESID validation defect for migration of XDSL
CR 0620	LESOG failing to return new DD on FOC
CR 0625	OCN mis-mapping for CSR retrievals in TAG
CR 0627	Jack USOC does not appear on LENS summary and not summit to LEO
CR 0628	LENS is allowing users with expired passwords to enter system
CR 0633 – CR060639	Parsed CSR

BellSouth has identified and published 31 defect Change Requests for the 10.3 release since its January 5, 2002 implementation.

As of January 22, 2002, there was a backlog of 61 defect change requests with only 37 scheduled for the April 7, 2002 release.

BellSouth internal release documentation for the above releases makes mention of the lack of sufficient time for appropriate pre-release testing within the release schedule. While the issue was noted, there was no apparent plan to mitigate the adverse impact of reduced pre-release testing.

Impact:

BellSouth's incomplete internal software testing may affect a CLEC's ability to efficiently execute transactions with BellSouth, resulting in CLEC customer dissatisfaction.

KPMG Consulting

AMENDED EXCEPTION 157

BellSouth OSS Testing Evaluation

Date: June 14, 2002

EXCEPTION REPORT

An exception has been identified as a result of the documentation and process verification review for Interface Development. (PPR5)

Exception:

BellSouth fails to follow its software testing and quality processes.

Background:

BellSouth did not completely test code changes for Releases 10.2 and 10.3 prior to these releases going into production.

During KPMG Consulting's observation of BellSouth's 10.2 and 10.3 releases, it was noted that there were significant defects in the software when the releases were placed into the production environment. Specific defects included:

In Release 10.2:

CR 0540	LENS defect – random numbers for a specific NPA are not available on resale change orders
CR 0542	LEO to populate internal TC opt field with AY when submitted TC opt is NO
CR 0547	LMU unable to reserve specific cable and pair
CR 0548	REQTYP M LSR's auto-clarifying on MFB USOC's
CR 0556	TAG users not receiving SVC ORD, L ORD and NP ORD on FOC's intermittently
CR 0560	EDI Mercator software application map defect
CR 0570	EDI orders are receiving an invalid rejection
CR 0573	Status NA only being returned on DSL FOC
CR 0574	XDSL RESID defect for use of facilities
CR 0580	LENS users are unable to validate Address at a DPA location when issuing a C order.

In Release 10.3:

CR 0585	CFA Invalid Auto-Clarification
CR 0588 – CR 0602	Parsed CSR
CR 0610	Parsed CSR
CR 0611	Incorrect error message on auto-clarify
CR 0612	Incorrect notification for XDSL
CR 0618	RESID validation defect for migration of XDSL
CR 0620	LESOG failing to return new DD on FOC
CR 0625	OCN mis-mapping for CSR retrievals in TAG
CR 0627	Jack USOC does not appear on LENS summary and not summit to LEO
CR 0628	LENS is allowing users with expired passwords to enter system
CR 0633 – CR060639	Parsed CSR

BellSouth has identified and published 31 defect Change Requests for the 10.3 release since its January 5, 2002 implementation.

As of January 22, 2002, there was a backlog of 61 defect change requests with only 37 scheduled for the April 7, 2002 release.

BellSouth internal release documentation for the above releases makes mention of the lack of sufficient time for appropriate pre-release testing within the release schedule. While the issue was noted, there was no apparent plan to mitigate the adverse impact of reduced pre-release testing.

Impact:

BellSouth's incomplete internal software testing may affect a CLEC's ability to efficiently execute transactions with BellSouth, resulting in CLEC customer dissatisfaction.

BellSouth Response:

BellSouth does follow its software testing and quality process. BellSouth's criteria for implementation of an Encore release include the following:

- Completion of at least 98% of System, Performance and Regression testing
- 97% test case pass rate
- No Severity 1 defects outstanding
- No Severity 2 defects outstanding that do not have a path forward for completion and do not have mechanized workarounds.

Our statistics on these objectives for Releases 10.2 and 10.3 were as follows:

Criteria	10.2 Results	10.3 Results
98% test completion	100%	99.9%
97% test cases passed	97.93%	98.66%
# Severity 1 defects outstanding	0	0
# Severity 2 defects outstanding	1	1

There were ten (10) defects cited as having resulted from Release 10.2 testing that were carried forward into production. Investigation into those specific defects has shown that although these defects were opened after the implementation of Release 10.2 on 11/3/01, most of these actually resulted from features implemented in prior releases as early as 8/30/01, but not detected. As indicated by the matrix below, all defects have been corrected and all were corrected in the intervals defined by the CCP process for the impact type. (See above tables for BellSouth's response to each specific issue associated with the 10.2 and 10.3 Releases.)

Impact	Defects Corrected	Scheduled with 10.4	Scheduled with 10.5	CCP Interval for Correction	Interval Met
High	2			10 business days	2
Medium	3			90 business days	3
Low	5			Best effort	5

There were thirty-one (31) defects cited as having resulted from 10.3 testing that were carried forward into production. Eight (8) of these defects were found in Release 10.3 system testing, all were considered to be of low impact and all were scheduled for correction and were in fact implemented in Release 10.3.1 on 2/2/02. Six (6) of these defects were found in Release 10.3.1 system testing, all were considered to be of low impact, one was corrected before release implementation, and the remaining five (5) are scheduled for implementation in Release 10.4. As indicated by the matrix below, all

defects cited have been corrected or are already scheduled and have or will meet the intervals defined by the CCP process for the impact type.

Impact	Defects Corrected	Scheduled with 10.4	Scheduled with 10.5	CCP Interval for Correction	Interval Met
High	0			10 business days	
Medium	2	4		90 business days	6
Low	15	8	2	Best effort	25

BellSouth's goal is to allow sufficient time for appropriate pre-release testing within the release schedule. BellSouth's testing cycle includes unit/product testing, system/integration testing, performance testing, regression testing and user acceptance testing. Due to the number and/or complexity of features implemented in our Encore releases, testing is always a challenge. The amount of time required for testing increases with each major release. As an example, Release 10.2 tested 823 new feature test cases and 2,126 regression test cases. Release 10.3 tested 1,938 new feature test cases and 3,062 regression test cases - an increase of 2,051 test cases. BellSouth mitigates these risks in a variety of ways, including more test case automation and, where required, an increase in trained testing personnel. In addition, lessons learned from each of our releases are being implemented, such as the sharing of test cases between vendors and a two-phased approach to performance testing as technology changes, are introduced.

KPMG also cites a backlog of sixty-one (61) defect change requests as of January 22, 2002. A March 5, 2002 analysis reveals a backlog of only thirty-eight (38) system defects and twenty-two (22) documentation defects as shown in the matrix below:

System Defects	
Scheduled for Implementation	23
Targeted by Release 10.6	8
New	4
Pending Clarification	3
Documentation Defects	
Scheduled	21
Targeted by Release 10.6	1

BellSouth is committed to providing our customers with new functionality in our applications in a timely manner with high quality standards.

BellSouth Amended Response:

An updated analysis, shown in the matrix below, reveals that BellSouth has already implemented the documentation defect that was indicated as "Targeted by Release 10.6."

System Defects	
Scheduled for Implementation	23
Targeted by Release 10.6	8
New	4
Pending Clarification	3
Documentation Defects	
Scheduled	21

KPMG Consulting Amendment:

KPMG Consulting's observation of BellSouth's Release 10.5 noted that there were significant defects in the software when releases were placed into the production environment. Specific defects included:

CR 0802	LMU via LENS experiencing COG API 0003 errors (high impact)
CR 0803	LSRs receiving COP API 0003 error if TAG API prior to 7.7 is used (medium impact)
CR 0804	LMU unable to reserve specific cable and pair Migration LSR's using LNA of G Defect (high impact)
CR 0805	REQTYP M LSR's auto-clarifying on MFB USOC's LSR's auto-clarified for WSOP when address has working QuickServ Defect (medium impact)
CR 0806	LENS loses data at times on secondary feature details on LNA if details have a space (medium impact)
CR 0807	Sups submitted on XDSL LSRs where initial pass of the LSR was prior to release 10.5 and required exception management, were routed to wrong exception management tool (high impact)
CR 0808	Reject not being received when orders submitted with invalid CC/PON/VER (medium impact)
CR 0810	LENS - on new locations with no prior services, LENS may supply the wrong address validation at times (medium impact)
CR 0811	PD status from order generated manually caused system to start new order flow (high impact)

CR 0812	CP status not being sent sporadically on UDC, EEDs and XDSL orders (high impact)
CR 0813	Jack USOC non-basic wiring defect (medium impact)

Impact:

BellSouth's incomplete internal software testing may affect a CLEC's ability to efficiently execute transactions with BellSouth, resulting in CLEC customer dissatisfaction.

BELLSOUTH

Change Request Form

To be completed by BCCM only: Date Sent: 04/26/02

(1) CHANGE REQUEST LOG #	CR 0756
(2) STATUS	S

To be completed by CCM or BellSouth:

(3) REQUEST TYPE	☒ TYPE 2 (REGULATORY)	☐ TYPE 3 (INDUSTRY)	☐ TYPE 4 (BST)	☐ TYPE 5 (CLEC)
	☒ TYPE 6 (DEFECT) NOTE: COMPLETE SECTION 2	☐ EXPEDITED FEATURE	☐ FLOW-THRU	

SECTION 1

(4) COMPANY NAME	BellSouth
(5) OCN	
(6) CCM NAME	Brenda Files
(7) TELEPHONE NUMBER	205 321 2105
(8) CCM EMAIL ADDRESS	
(9) CCM FAX NUMBER	205 321 5160
(10) ALTERNATE CCM NAME	
(11) ALTERNATE PHONE NUMBER	
(12) ORIGINATOR'S NAME	William Aguila/Sandra Davis
(13) ORIGINATOR'S PHONE NUMBER	205 321 2105
(14) TITLE OF CHANGE REQUEST	UNE-P call Scope Changes

(15) CATEGORY	☒ ADD NEW FUNCTIONLITY	☐ CHANGE EXISTING
(16) DESIRED DUE DATE		

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

BELLSOUTH

Change Request Form

(17) ORIGINATING CCM ASSESSMENT OF IMPACT	☒ HIGH	☐ MEDIUM	☐ LOW	
(18) ORIGINATING CCM ASSESSMENT OF PRIORITY	☒ URGENT	☐ HIGH	☐ MEDIUM	☐ LOW

(19) INTERFACES IMPACTED				
PRE-ORDERING	☐ LENS	☐ TAG	☐ CSOTS	
ORDERING	☒ EDI	☒ LENS	☒ TAG	☐ LNP
MAINTENANCE	☐ TAFI	☐ EC-TA Local		
MANUAL	☐ Manual			

(20) TYPE OF CHANGE (Check one or more, as applicable)				
☐ Software	☐ Product & Services	☒ Documentation	☐ Hardware	☐ New or Revised Edits
☒ Regulatory	☐ Industry Standards	☐ Process	☐ Other	☒ Defect
☐ Expedited Feature	☐ Flow Through			

(21) DESCRIPTION OF REQUESTED CHANGE (Including purpose and benefit received from this change. Include attachments if available)	**Order# 2000-AD-413 Dated 9/19/2000** To update the LESOG UNE-P Guide USOC Matrix table for manual and electronic ordering and remap table with rearranged existing BellSouth retail USOCs and the corresponding UNE-P USOCs and add these new States specific USOCs UEPWQ,UEPWC,UEPWR,UEPWP,UEPWD,UEPWS,UEPWT,UEPWA,UEPWE,UEPWG,UEPWJ,UEPWL,UEPWN,UEPWB,UEPWF,UEPWH,UEPWK,UEPWM,UEPWO,UEPB2,UEPB3,UEPA5,UEPA7,UEPA8,UEPA1,UEPA9, UEPRQ, UEPRS, UEPRR, UEPRT, UEPBA, UEPBB, UEPBE, and UEPA6. We will also make the LNECLSSVC field required for all LNAs of N.
(22) REQ TYP(s) IMPACTED:	M
(23) ACT TYP(s) IMPACTED:	
(24) PROVIDE EXAMPLE OF REQUESTED CHANGE:	
(25) Identify the LSOG versions that are affected by this change	TCIF 9

This section to be completed by BellSouth only:

(26) Does this request require clarification?	☐ YES	☒ NO
(27) Clarification Request Sent		
(28) Clarification Response Due		

BELLSOUTH

Change Request Form

(29) Change Request Review Date	
(30) Target Implementation Date	08/24/02 – Release 10.6
(31) Actual Implementation Date	

(32) Change Review Meeting Results	04/26/02 Being reviewed for acceptance. 05/01/02 Scheduled for Release 10.6 on 7/13/02. User Requirements distributed. User Requirements review scheduled for 5/14/02. 05/13/02 WorldCom escalation requesting a delay in implementation date for CR0756 until CLECs can discuss this issue and understand the impacts to CLEC systems. 05/14/02 User Requirements Review meeting. 05/16/02 BST provided response to WorldCom's escalation. BST to provide the CCP participants by 5/20/02 with information responsive to the questions raised during the 5/14/02 User Requirements Review meeting. BST will ask the CCP members to respond by 5/24/02 on whether CR0756 should be implemented in Release 10.6. BST will proceed based on the decision of a majority of carriers who respond. 05/17/02 WorldCom submitted additional questions regarding CR0756. 05/20/02 BST provided response to WorldCom's additional questions. Also included responses to questions raised during the 5/14/02 user requirements review. BST requested that the CLECs submit their vote on whether to proceed or not with implementing CR0756 in Release 10.6 by 05/24/02. 05/21/02 WorldCom submitted additional questions. 05/23/02 BST provided response to WorldCom and requested clarification. 05/23/02 WorldCom provided clarification to BST. 05/24/02 AT&T sent email supporting WorldCom's comments/concerns. 05/28/02 AT&T submitted questions regarding the responses BST provided on 5/20/02. 05/30/02 BST provided response to WorldCom's 05/3/02 clarification email. 06/03/02 BST provided response to AT&T's 05/28/02 email.

Attachment A-1

BELLSOUTH

Change Request Form

	06/03/02 Conference call held with CLEC community to address questions and to vote on whether to proceed with implementation of CR0756 in Release 10.6. CLECs on the call voted to proceed with implementing CR0756 in Release 10.6 with the following stipulations: • MS order – classified as a Type 2 CLECs will be able to convert BellSouth retail or resale services affected by the MS Desoto County Expanded Local Calling Order to comparable UNE-P services with expanded local calling. • All other changes – classified as a Type 6 – High Impact 1) Additional Non-Caller ID UNE Port USOCs to more completely and clearly delineate between USOCs to be used with Caller ID and those that will not support Caller ID. 2) New UNE Port USOCs that may be used to distinguish between the measured and flat-rate basic 10 digit dialing scope when converting BellSouth retail or resale lines in Georgia to UNE ports 3) New UNE Port USOCs supporting conversions from BellSouth's retail's Area Plus Service in Florida with CREX7. • Ongoing updates provided regarding testing in CAVE BST/CLECs agreed to disagree on the classification of CR0756. BST's position is that CR0756 is a Type 2 Regulatory change. Based on CLEC comments that certain changes within CR0756 are Type 6 Defects, BST acknowledged that they would probably be assessed as Medium Impact defects, if this was true, but would confirm. BST agreed to investigate providing updated user requirements that include all the questions/responses regarding CR0756. 6-5-02 Implementation date for Release 10.6 changed to 8/24/02-8/25/02. CAVE and Production implementation of Release 10.6 changed in order to allow BST additional time to perform internal testing and CLECs additional time to test software in CAVE. 6/5/02 Based on further review, BST's position is that this feature is not a defect. No impact classification is appropriate.

(33) CANCELED CHANGE REQUEST	☐ DUPLICATE	☐ TRAINING	☐ CLARIFICATION NOT RECEIVED
(34) CANCELATION ACKNOWLEDGMENT	☐ CLEC	☐ BST	DATE:

BELLSOUTH

Change Request Form

(35) APPEAL	☐ YES	☐ NO
(36) APPEAL CONSIDERATIONS		

SECTION 2
This section to be completed by CLEC/BellSouth- External Explanation of Type 6 Defect Change Request

(37) PON #	
(38) ERROR MESSAGE:	
(39) RELEASE OR API VERSION (If applicable)	
(40) DESCRIPTION OF DEFECT SCENARIO:	

SECTION 3
This section to be completed by BellSouth – Internal Validation of Defect Change Request

(41) DEFECT VALIDATION RESULTS:	
(42) CLARIFICATION NEEDED:	☐ YES ☐ NO
(43) VALIDATED DEFECT IMPACT LEVEL:	☐ HIGH ☐ MEDIUM ☐ LOW
(44) VALIDATION TYPE:	☐ DEFECT ☐ FEATURE ☐ TRAINING ISSUE ☐ DUPLICATE
(45) DEFECT IMPACTS OTHER CLECS?	☐ YES ☐ NO
(46) INTERFACES IMPACTED BY DEFECT:	☐ EDI ☐ TAG ☐ LNP ☐ LENS ☐ TCIF 7 ☐ TCIF 9
(47) TARGET IMPLEMENTATION DATE:	
(48) ACTUAL IMPLEMENTATION DATE:	

BELLSOUTH

Change Request Form

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

BELLSOUTH

ENCORE User Requirements for

UNE-P Call Scope Changes

Final

ENC21046.DOC

Version 6.0

April 30, 2002

Docket 97-00309
Exhibit JMB-21

1. SCOPE

2.1 Business Implications

2.1.1 Current Process

Current Process	
•	Currently, when converting Retail/Resale to UNE-P, the correct LNECLSSVC is not always populated on the conversation.
•	
•	
•	

2.1.2 Expected Process

Expected Process	
•	With implementation of this feature, conversions from Retail/Resale lines to UNE-P will result in the correct LNECLSSVC USOC being populated.
•	Add new USOCS to UNE-P Table.
•	.

2. USER REQUIREMENTS

Requirement No.	User Requirement
UR21046.0001	This requirement is applicable to TCIF 9.
UR21046.0010	This requirement is applicable to REQTYP M.
UR21046.0020	Deleted
UR21046.0020a	Deleted
UR21046.0020b	Deleted
UR21046.0025	Deleted
UR21046.0030	Deleted
UR21046.0040	When an LSR is submitted, LNA=N, the Line Class of Service (LNECLSSVC) Field is Required.
UR21046.0050	When an LSR is submitted, LNA=N, and the LNECLSSVC Field is blank, the system will return the following error message, "LNECLSSVC REQUIRED FOR LNA=N."
UR21046.0060	When an LSR is submitted, LNA = W or P, the system will convert the current USOC to the UNE LNECLSSVC USOC listed in Attachment I and II by state and populate the USOC on the service order.
UR21046.0062	When an LSR is submitted, LNA = W or P, the LNECLSSVC is prohibited.
UR21046.0062a	When an LSR is submitted, LNA = W or P, and the LNECLSSVC is populated, the system will return the following error message. "LNECLSSVC PROHIBITED WITH LNA = W or P."
UR21046.0063	When an LSR is submitted on a Residence account, 1st character of TOS =2, the system will verify that the LNECLSSVC Field is populated with a LNECLSSVC USOC listed in Attachment 1 by state, and if found, continue processing the request.
UR21046.0063a	When an LSR is submitted on a Residence account, 1st character of TOS =2, the system will verify that the LNECLSVC Field is populated with a LNECLSSVC USOC found in Attachment 1 by state, and if NOT found, the system will return the following error message. "INVALID LNECLSSVC FOR TOS."
UR21046.0064	When an LSR is submitted on a Business account, 1st character of TOS =1, the system will verify that the LNECLSSVC Field is populated with a LNECLSSVC USOC found in Attachment 1I by state, and if found, continue processing the request.
UR21046.0064a	When an LSR is submitted on a Business account, 1st character of TOS =1, the system will verify that the LNECLSSVC Field is populated with a LNECLSSVC USOC found in Attachment I1 by state, and if NOT found, the system will return the following error message. "INVALID LNECLSSVC FOR TOS."
UR21046.0065	Deleted

Requirement No.	User Requirement
UR21046.0067	Deleted
UR21046.0070	When an LSR is submitted for ACT= V, P, or Q, and the LNECLSSVC Field is not populated, the system will convert the current USOC to the UNE LNECLSSVC USOC listed in Attachment I and II by state and populate the USOC on the service order.
UR21046.0075	Deleted.
UR21046.0080	When an LSR is submitted for ACT= W, the system will convert the current USOC to the UNE LNECLSSVC USOC listed in Attachment I and II by state and populate the USOC on the service order.
UR21046.0090	Renumbered as UR21046.0170
UR21046.0100	Renumbered as UR21046.0180
UR21046.0110	Deleted
UR21046.0120	Deleted
UR21046.0130	Deleted
UR21046.0140	Deleted
UR21046.0150	Deleted
UR21046.0160	Deleted
UR21046.0165	When an LSR is submitted on a Residence Account and a Caller ID USOC from the list below is present in the Feature Detail Field, the system will verify that either: 1. the LNECLSSVC Field is populated with one of the LNECLSSVC with Caller ID USOC in Attachment I, or 2. the LNECLSSVC is blank and the USOC is migrating to to a Caller ID USOC in Attachment I for ACT = V, P, Q or, 3. the LNECLSSVC is blank and the existing Category 'D' USOC is a Caller ID USOC in Attachment I, for ACT = C. If true, continue processing the service order. **Caller ID USOCs** NSD NSDCR NSDMN **N1ACR** NXM NXECR NXEWX NXMMN NXMCR **NCACR**
UR21046.0166	If the conditions in Requirement UR21046.0165 are not met, return the following error message: "INVALID LNECLSSVC USOC"

Requirement No.	User Requirement
UR21046.0167	When an LSR is submitted on a Business Account and a Caller ID USOC from the list below is present in the Feature Detail Field, the system will verify that either: 1. the LNECLSSVC Field is populated with one of the LNECLSSVC with Caller ID USOC in Attachment II, or 2. the LNECLSSVC is blank and the USOC is migrating to to a Caller ID USOC in Attachment II for ACT = V, P, Q or, 3. the LNECLSSVC is blank and the existing Category 'D' USOC is a Caller ID USOC in Attachment II, for ACT = C. If true, continue processing the service order. **Caller ID USOCs** NSD NSDCR NSDMN **N1ACR** NXM NXECR NXEWX NXMMN NXMCR **NCACR**
UR21046.0168	If the conditions in Requirement UR21046.0167 are not met, return the following error message: "INVALID LNECLSSVC USOC"

<table>
<tr><th>Requirement No.</th><th>User Requirement</th></tr>
<tr><td>UR21046.0170</td><td>The system will add the following NEW Residence USOCS to the existing table for REQTYP M:

NEW RESIDENCE USOCS
<table>
<tr><th>State</th><th>Description</th><th>UNE LNECLSSVC USOC</th></tr>
<tr><td>AL</td><td>Alabama Extended Local Dialing Parity Port without Caller ID Capability</td><td>UEPWA</td></tr>
<tr><td>FL</td><td>Florida Extended Dialing Port With Caller ID Capability and CREX7</td><td>UEPA1</td></tr>
<tr><td>FL</td><td>Florida Extended Dialing Port Without Caller ID Capability and CREX7</td><td>UEPA8</td></tr>
<tr><td>FL</td><td>Florida Area Calling Without Caller ID Capability</td><td>UEPA9</td></tr>
<tr><td>GA</td><td>Port Without Caller ID Capability</td><td>UEPWC</td></tr>
<tr><td>GA</td><td>Port With Caller ID Capability</td><td>UEPWQ</td></tr>
<tr><td>GA</td><td>Out Going Only Port</td><td>UEPWR</td></tr>
<tr><td>KY</td><td>Kentucky Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWE</td></tr>
<tr><td>LA</td><td>Louisiana Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWG</td></tr>
<tr><td>LA</td><td>Louisiana Area Plus Without Caller ID Capability</td><td>UEPRQ</td></tr>
<tr><td>MS</td><td>Mississippi Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWJ</td></tr>
<tr><td>SC</td><td>South Carolina Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWL</td></tr>
<tr><td>SC</td><td>South Carolina Area Calling Port Without Caller ID Capability</td><td>UEPRS</td></tr>
<tr><td>TN</td><td>Tennessee Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWN</td></tr>
<tr><td>TN</td><td>Tennessee Area Plus Without Caller ID Capability</td><td>UEPRR</td></tr>
<tr><td>ALL</td><td>Low Usage Line Port Without Caller ID Capability</td><td>UEPRT</td></tr>
</table></td></tr>
</table>

<table>
<tr><th>Requirement No.</th><th>User Requirement</th></tr>
<tr><td>UR21046.0180</td><td>The system will add the following NEW Business USOCS to the existing table for REQTYP M:

NEW BUSINESS USOCS
<table>
<tr><th>State</th><th>Description</th><th>UNE LNECLSSVC USOC</th></tr>
<tr><td>AL</td><td>Alabama Extended Local Dialing Parity Port without Caller ID Capability</td><td>UEPWB</td></tr>
<tr><td>GA</td><td>Port Without Caller ID Capability</td><td>UEPWD</td></tr>
<tr><td>GA</td><td>Port With Caller ID Capability</td><td>UEPWP</td></tr>
<tr><td>KY</td><td>Kentucky Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWF</td></tr>
<tr><td>LA</td><td>Louisiana Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWH</td></tr>
<tr><td>LA</td><td>Louisiana Business Area Calling Port Without Caller ID</td><td>UEPBA</td></tr>
<tr><td>MS</td><td>Mississippi Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWK</td></tr>
<tr><td>SC</td><td>South Carolina Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWM</td></tr>
<tr><td>SC</td><td>South Carolina Business Area Calling Port Without Caller ID</td><td>UEPBB</td></tr>
<tr><td>TN</td><td>Tennessee Extended Local Dialing Parity Port Without Caller ID Capability</td><td>UEPWO</td></tr>
<tr><td>TN</td><td>Tennessee (BUS) Inward Collierville and Memphis Local Calling Plan</td><td>UEPB2</td></tr>
<tr><td>TN</td><td>Tennessee (BUS) 2-Way Collierville and Memphis Local Calling Plan</td><td>UEPB3</td></tr>
<tr><td>ALL</td><td>Incoming Only Without Caller ID Capability</td><td>UEPBE</td></tr>
</table></td></tr>
<tr><td>UR21046.0190</td><td>When an LSR is submitted on a Residence Account without Caller ID (Caller ID USOCs are listed in UR21046.0165), the system will validate that the LNECLSSVC is populated with one of the LNECLSSVC without Caller ID USOC in Attachment I, and if found, continue processing the service order.</td></tr>
</table>

Requirement No.	User Requirement
UR21046.0200	When an LSR is submitted on a Residence Account without Caller ID (Caller ID USOCs are listed in UR21046.0165), the system will validate that the LNECLSSVC is populated with one of the LNECLSSVC without Caller ID USOC in Attachment I, and if NOT found, return the following error message. "INVALID LNECLSSVC USOC."
UR21046.0210	When an LSR is submitted on a Business Account without Caller ID (Caller ID USOCs are listed in UR21046.0167), the system will validate that the LNECLSSVC is populated with one of the LNECLSSVC without Caller ID USOC in Attachment II, and if found, continue processing the service order.
UR21046.0220	When an LSR is submitted on a Business Account without Caller ID (Caller ID USOCs are listed in UR21046.0167), the system will validate that the LNECLSSVC is populated with one of the LNECLSSVC without Caller ID USOC in Attachment II, and if NOT found, return the following error message. "INVALID LNECLSSVC USOC."
UR21046.0230	Deleted
UR21046.0240	Deleted
UR21046.0250	When an LSR is received on an existing Residence Account without Caller ID (with the absence of one of the Caller ID USOCs in UR21046.0165) and the Category 'D' USOC on the CSR is a Port With Caller ID, the system will change the Category 'D' USOC to the corresponding USOC without Caller ID found in Attachment I by state.
UR21046.0260	When an LSR is received on an existing Business Account without Caller ID (with the absence of one of the Caller ID USOCs in UR21046.0167) and the Category 'D' USOC on the CSR is a Port With Caller ID, the system will change the Category 'D' USOC to the corresponding USOC without Caller ID Attachment II by state.
UR21046.0270	The DDC (Due Date Calculator) will use existing functionality for calculating DD (Due Date) for the new USOCs listed in UR21046.0170 & 0180 as it does today for non-complex REQTYP M.
UR21046.0280	When an LSR is received, ACT = C, to add USOC **NCACR** or **N1ACR**, calculate the due date using the Feature Exception Interval.
UR21046.0290	When a SUP 03 "All Other Changes," is received, and there is an addition of Feature Activity = N, with LNA of C or V with features NCACR or N1ACR populated in the Feature Detail of the LSR, the system will consider the LSR as having "Significant Changes for Due Date Purposes."

ATTACHMENT 1/RESIDENCE LNECLSSVC USOCS

State	Description	Retail/Resale	UNE LNECLSSVC

		USOC	USOC
AL	Port Without Caller ID Capability	1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, 14D, 14R, 14X, 1DF, 1ER, 1ERNF, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3	UEPRL
AL	Port With Caller ID Capability	1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, 14RCL, 1FRCL, VR3CL	UEPRC
AL	Out Going Only Port	OFR, 1MFOX, OML	UEPRO
AL	Alabama Extended Local Dialing Parity Port with Caller ID Capability	AC1CL, ACPCL, ACRCL, AP1CL, AP2CL, ASRCL	UEPAR
AL	Alabama Extended Local Dialing Parity Without Caller ID Capability	AC1, ACP, ACR, AP1, AP2, ASR	**UEPWA**
FL	Port Without Caller ID Capability	1KA, 1KL, 1KP, 1KV, LCL, LED, LEF, LEG, LEH, LSH, LSHOL, LSJ, LSL, LSP, LSQ, LUY, 1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, 14D, 14R, 14X, 1DF, 1ER, 1ERNF, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3, VR5, VR6	UEPRL
FL	Port With Caller ID Capability	LSJCL, LSLCL,	UEPRC

		LUYCL, 1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, 14RCL, 1FRCL, VR3CL, VR5CL, VR6CL	
FL	Out Going Only Port	OFR, 1MFOX, OML	UEPRO
FL	Florida Area Calling With Caller ID Capability	1OECL, RUBCL	UEPAF
FL	Florida Area Calling Without Caller ID Capability	1OE, RUB	**UEPA9**
FL	Florida Extended Dialing Port With Caller ID Capability and CREX7	VR5CL, VR6CL	**UEPA1**
FL	Florida Extended Dialing Port Without Caller ID Capability and CREX7	VR5, VR6	**UEPA8**
GA	Port Without Caller ID Capability	14D, 14R, 14X, 1DF, 1ER, 1ERNF, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3	**UEPWC**
GA	Port With Caller ID Capability	14RCL, 1FRCL, VR3CL,	**UEPWQ**
GA	Out Going Only Port	OFR	**UEPWR**
GA	Georgia Extended Dialing Plan Port With Caller ID Capability	1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, VR1CL, VR4CL	UEPRC
GA	Georgia Extended Dialing Plan Port Without Caller ID Capability	1ARGE, 1MRGE, VR1, VR4, 1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC	UEPRL

GA	Georgia Extended Dialing Plan Port Out Going Only	1MFOX, OML	UEPRO
KY	Port Without Caller ID Capability	1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, 14D, 14R, 14X, 1DF, 1ER, 1ERNF, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3	UEPRL
KY	Port With Caller ID Capability	1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, 14RCL, 1FRCL, VR3CL	UEPRC
KY	Out Going Only Port	OFR, 1MFOX, OML	UEPRO
KY	Kentucky Extended Local Dialing Parity Port With Caller ID Capability	AC3CL, AQ3CL, AQCCL, AR3CL	UEPRM
KY	Kentucky Extended Local Dialing Parity Port Without Caller ID Capability	AC3, AQ3, AQC, AR3, R2K2D, R2K2K, R2KWP	**UEPWE**
LA	Port Without Caller ID Capability	1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, 14D, 14R, 14X, 1DF, 1ER, 1ERNF, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3	UEPRL
LA	Port With Caller ID Capability	1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, 14RCL, 1FRCL, VR3CL	UEPRC

LA	Out Going Only Port	OFR, 1MFOX, OML	UEPRO
LA	Louisiana Extended Local Dialing Parity Port With Caller ID Capability	AC4CL, AR4CL, L1RCL, L3RCL	UEPAS
LA	Louisiana Extended Local Dialing Parity Port Without Caller ID Capability	1ME, AC4, AR4, L1R, L3R	**UEPWG**
LA	Louisiana Area Plus With Caller ID Capability	RULCL	UEPAG
LA	Louisiana Area Plus Without Caller ID Capability	RUL	**UEPRQ**
MS	Port Without Caller ID Capability	1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, 14D, 14R, 14X, 1DF, 1ER, 1ERNF, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3	UEPRL
MS	Port With Caller ID Capability	1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, 14RCL, 1FRCL, VR3CL	UEPRC
MS	Out Going Only Port	OFR, 1MFOX, OML	UEPRO
MS	Mississippi Extended Local Dialing Parity Port With Caller ID Capability	1ZMCL, A6CCL, AR6CL, ARBCL, ARLCL, ERBCL, ERLCL, ROPCL	UEPAT
MS	Mississippi Extended Local Dialing Parity Port Without Caller ID Capability	1ZM, A6C, AR6, ARB, ARL, ERB, ERL, MEPER, MEPSR, ROP	**UEPWJ**
NC	Port Without Caller ID Capability	1MA, ACO, ARO, CCG, CGR, FGR, PCR, PDR, PER, PFR, PMR, PSR, VRO,	UEPRL

		1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, 14D, 14R, 14X, 1DF, 1ER, 1ERNG, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3	
NC	Port With Caller ID Capability	CGRCL, CCGCL, PSRCL, FGRCL, PMRCL, PCRCL, ACOCL, AROCL, VROCL, 1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, 14RCL, 1FRCL, VR3CL	UEPRC
NC	Out Going Only Port	RRN, RRS, OFR, 1MFOX, OML	UEPRO
SC	Port Without Caller ID Capability	1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, 14D, 14R, 14X, 1DF, 1ER, 1ERNF, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3	UEPRL
SC	Port With Caller ID Capability	1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, 14RCL, 1FRCL, VR3CL	UEPRC

SC	Out Going Only Port	OFR, 1MFOX, OML	UEPRO
SC	South Carolina Extended Local Dialing Parity Port With Caller ID Capability	A6PCL, VR2CL	UEPAU
SC	South Carolina Extended Local Dialing Parity Port Without Caller ID Capability	A6P, VR2	**UEPWL**
SC	South Carolina Area Calling Port With Caller ID Capability	LW8CL, RVJCL	UEPAJ
SC	South Carolina Area Calling Port Without Caller ID Capability	LW8, RVJ,	**UEPRS**
TN	Port Without Caller ID Capability	1DM, 1KS, 1MR, 1MS, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, 14D, 14R, 14X, 1DF, 1ER, 1ERNF, 1FR, 1FW, 24R, 2FR, 44R, 4FR, 4LP, VR3	UEPRL
TN	Port With Caller ID Capability	1KSCL, 1MRCL, 1MSCL, LM8CL, LMRCL, LW1CL, R1MCL, RUACL, 14RCL, 1FRCL, VR3CL	UEPRC
TN	Out Going Only Port	OFR, 1MFOX, OML	UEPRO
TN	Tennessee Extended Local Dialing Parity Port With Caller ID Capability	AR7CL, ATLCL, AT3CL, RWGCL	UEPAQ
TN	Tennessee Extended Local Dialing Parity Port Without Caller ID Capability	AR7, ATL, AT3, R2M, RUR, RWG, TAKER	**UEPWN**
TN	Tennessee Area Calling Port With Caller ID Capability	F2R	UEPAK
TN	Tennessee Area Calling Port With Caller ID Capability	TACER	UEPAL
TN	Tennessee Area Calling Port With Caller ID Capability	TACSR	UEPAM
TN	Tennessee Area Calling Port With	IMF2X	UEPAN

	Caller ID Capability		
TN	Tennessee Area Calling Port With Caller ID Capability	2MR	UEPAO
TN	Tennessee Area Plus With Caller ID Capability	AC7CL	UEPAH
TN	Tennessee Area Plus Without Caller ID Capability	AC7	**UEPRR**
ALL	Low Usage Line Port With Caller ID Capability	LUMCL	UEPAP
ALL	Low Usage Line Port Without Caller ID Capability	LUM	**UEPRT**

ATTACHMENT II/BUSINESS LNECLSSVC USOCS

State	Description	Current USOC	UNE LNECLSSVC USOC
AL	Port Without Caller ID Capability	1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	UEPBL
AL	Port With Caller ID Capability	1MBCL, 1MGCL, 1MHCL, BUACL, BUECL, B1MCL, 1FBCL	UEPBC
AL	Alabama Extended Local Dialing Parity Port With Caller ID Capability	ACBCL, ASBCL, BF1CL, BF2CL	UEPAW
AL	Alabama Extended Local Dialing Parity Port Without Caller ID Capability	1EC2A, ACB, ACB2U, ASB, ASB2U, BF1, BF2	**UEPWB**
FL	Port Without Caller ID Capability	LCDC1, LCFC1, LUN, LSXC3, LSYC3, 5T2, 5TD, ABF, BD1, BD2, BD3, LEJ, LEM, LEN, LER, LUO, LUP, LUR, LUT, LUZ, 1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	UEPBL
FL	Port With Caller ID Capability	ABFCL, BD1CL,	UEPBC

		BD2CL, BD3CL, LUOCL, LUPCL, LURCL, LUTCL, LUZCL, 1MBCL, 1MGCL, MHCL, BUACL, BUECL, B1MCL, 1FBCL	
GA	Port Without Caller ID Capability	1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	**UEPWD**
GA	Port With Caller ID Capability	1FBCL	**UEPWP**
GA	Georgia Extended Dialing Plan Port With Caller ID Capability	ABWCL, BG1CL, BG2CL, 1MBCL, 1MGCL, 1MHCL, BUACL, BUECL, B1MCL	UEPBC
GA	Georgia Extended Dialing Plan Port Without Caller ID Capability	1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1MBGE, ABW, BG1, BG2	UEPBL
KY	Port Without Caller ID Capability	1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	UEPBL
KY	Port With Caller ID Capability	1MBCL, 1MGCL, 1MHCL, BUACL, BUECL, B1MCL, 1FBCL	UEPBC
KY	Incoming Only Without Caller ID Capability	B2K1D, B2K1K	**UEPBE**

KY	Kentucky Extended Local Dialing Parity Port With Caller ID Capability	BK1CL, BK2CL	UEPBM
KY	Kentucky Extended Local Dialing Parity Port Without Caller ID Capability	B2K2D, B2K2K, B2K2P, BK1, BK2	**UEPWF**
LA	Port Without Caller ID Capability	1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	UEPBL
LA	Port With Caller ID Capability	1MBCL, 1MGCL, 1MHCL, BUACL, BUECL, B1MCL, 1FBCL	UEPBC
LA	Incoming Only Without Caller ID Capability	AL21X, ALS1X	**UEPBE**
LA	Louisiana Extended Local Dialing Parity Port With Caller ID Capability	1OQCL, L1BCL, L3BCL, BL1CL, BL2CL	UEPAX
LA	Louisiana Extended Local Dialing Parity Port Without Caller ID Capability	1OQ, L1B, L3B, BL1, BL2	**UEPWH**
LA	Louisiana Business Area Calling Port With Caller ID Capability	BUCCL	UEPAA
LA	Louisiana Business Area Calling Port Without Caller ID Capability	BUC	**UEPBA**
MS	Port Without Caller ID Capability	1ZK, 1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	UEPBL
MS	Port With Caller ID Capability	1MBCL, 1MGCL,	UEPBC

		1MHCL, BUACL, BUECL, B1MCL, 1FBCL	
MS	Incoming Only Without Caller ID Capability	BO8, BOJ	**UEPBE**
MS	Mississippi Extended Local Dialing Parity Port With Caller ID Capability	1S8CL, 1ZJCL, BU1CL, BU2CL	UEPAY
MS	Mississippi Extended Local Dialing Parity Port Without Caller ID Capability	MEP1B, 1S8, 1ZJ, BU1, BU2	**UEPWK**
NC	Port Without Caller ID Capability	CGB, SBG, CPG, CSG, LGGCP, 1SB, LGGCT, 1CB, LGGEP, PBC, PCE, PEB, PES, PMBCB, PBMSB, PMQCB, PMQSB, LGGET, PCX, PDB, PDS, PPB, BV1, BV2, 1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	UEPBL
NC	Port With Caller ID Capability	CGBCL, CPGCL, CSGCL, 1SBCL, 1CBCL, PBCCL, PCECL, PCXCL, PPBCL, BV1CL, BV2CL, 1MBCL, 1MGCL, 1MHCL, BUACL, BUECL, B1MCL, 1FBCL	UEPBC

SC	Port Without Caller ID Capability	BVJ, 1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	UEPBL
SC	Port With Caller ID Capability	1MBCL, 1MGCL, 1MHCL, BUACL, BUECL, B1MCL, 1FBCL	UEPBC
SC	South Carolina Extended Local Dialing Parity Port With Caller ID Capability	B6PCL, BS1CL, BS2CL	UEPAZ
SC	South Carolina Extended Local Dialing Parity Port Without Caller ID Capability	B6P, BS1, BS2, CCS	**UEPWM**
SC	South Carolina Business Area Calling Port With Caller ID Capability	LMBCL	UEPAB
SC	South Carolina Business Area Calling Port Without Caller ID Capability	LMB	**UEPBB**
TN	Port Without Caller ID Capability	1EC2X, 1MB, 1MG, 1MH, 1UA, 1UB, BUA, BUE, BZG, BZJ, CC1, MR2, B1M, 1CS, 1EF, 1EFNF, 1FB, 1FE, 1FL, 1FT, 2FB, 4FB	UEPBL
TN	Port With Caller ID Capability	1MBCL, 1MGCL, 1MHCL, BUACL, BUECL, B1MCL, 1FBCL	UEPBC
TN	Incoming Only Without Caller ID Capability	TAC1B, TAC2B, 1NZ, TAK1B	**UEPBE**

TN	Tennessee Extended Local Dialing Parity Port With Caller ID Capability	BT1CL, BT2CL, 113CL	UEPAV
TN	Tennessee Extended Local Dialing Parity Port Without Caller ID Capability	BT1, BT2, 113, TAKC1	**UEPWO**
TN	Tennessee (BUS) 2-Way Area Calling Port Economy Option	TACC1	UEPAC
TN	Tennessee (BUS) 2-Way Area Calling Port Standard Option	TACC2	UEPAD
TN	Tennessee (BUS) 2-Way Collierville and Memphis Local Calling Port	B2F, B2M	UEPAE
TN	Tennessee (BUS) Inward Collierville and Memphis Local Calling Plan	1MB2X	**UEPB2**
TN	Tennessee (BUS) 2-Way Collierville and Memphis Local Calling Plan	B1F	**UEPB3**
ALL	Out Going Only Port	1OC, OFB	UEPBO
ALL	Incoming Only With Caller ID Capability	7FBCL	UEPB1
ALL	Incoming Only Without Caller ID Capability	7FB, 1NA, 1NG	**UEPBE**

CR0756 – UNE-P Call Scope Changes
Responses to AT&T Questions Submitted 6-4-02

1. CLECs (AT&T, WorldCom, ITCDeltaCom, Ztel & Birch) voted to go ahead with CR756 in Release 10.6, which has now moved from July until August 24, 2002 with the following caveats because BST would not provide another date in 2002 for its implementation:

a. BST will alter CR756 to reflect that only the MS Changes ordered by the MS PSC are Type 2 (Reg)
b. BST will alter CR756 to reflect that all others changes listed in the other 8 states are classified as Type 6 (Defects)
c. BST will note that CLECs want these Defects noted as "High Impact". BST wants to make them "Medium".
d. BST will roll this code under CR756 into CAVE for CLEC testing, as CLECs are still very concerned about the code BST will deliver
e. BST will communicate any issues identified during testing of this software to CLEC community

BST Response:

A & B. Based on CLEC comments, CR0756 has been classified as a Type 2/6. BST/CLECs agreed to disagree on the classification of CR0756. BST views CR0756 as a Type 2 only.
C. BST has noted on the change request that the CLECs view the other changes as High Impact defects. BST acknowledged that if these other changes were defects, they would probably be assessed as Medium Impact defects. After further review, BST's position is that this feature is not a defect; therefore no impact classification is appropriate.
D. CR0756 will be available for testing in CAVE.
E. BST will communicate defects that are found in testing and will not be corrected prior to production.

2. Latest BST concerning revelation: all line conversions to UNE P from BST retail require that BST establish a new port even with the use of the RRSO FID which was provided July 18,2001 as THE way that BST would relate the BST D and N Service Orders as well as re-use facilities so as to avoid the loss of dial tone to end users. Today LCSC staff explained that this FID was to only relate the D & N order which is NOT what CLECs were told last summer.

BST Response:

The scenario that was discussed during the meeting did NOT involve all lines converting to UNE-P. The scenario MCI posed was a conversion from, for example, BellSouth retail Area Plus to a basic UNE-P service that replicates the 1FR service. The question was, does such a conversion to a non-equivalent UNE-P port require the physical switch port to change. The answer is no, with the exception of conversions from a non-caller id supported BellSouth retail service to a caller is capable UNE-P port in the following switches:

AL: BHAM-HOMEWOOD DS0, HUNTS-UNIVERSITY DS0, MOBL-SEMMES DS0, MOULTON DS0

FL: BCRT BOCA TEECA DS0, DYBH-PORT ORANGE DS0, GULF BREEZE DS0, JCVL-NORMANDY DS0, JCVL-SAN JOSE 73E, LYNNHAVEN DS0, MIAM AIRPORT DS0, NDAD GOLDEN GLADES DS0, PANAMA CITY MAIN DS0, PNSC-WARRINGTON DS0

LA: BT.RG.-OAK HILLS DS0, BT.RG.-WOODLAWN DS0

CR0756 – UNE-P Call Scope Changes
Responses to AT&T Questions Submitted 6-4-02

MS: GNWD MAIN DS0

NC: CHERRYVILLE-CENTRAL 435, ENKA-MAIN 66F, LUMBERTON-MAIN 73F, SELMA-MAIN 96F, SPRUCE PINE-MAIN 76F, WAYNESVILLE-MAIN 45F

SC: SUMMERVILLE MA 87E

3. Given the explanation today that the RRSO FID ONLY related orders, WHAT advantage does the Single C in GA, FL, MS and AL give my end user?

BST Response:
With Single C, there will be one single order rather than two, which could cause orders to be separated. Last year, edits were put in place to assist the LCSC service representatives in placing the RRSO FID on the D and N to keep the orders from getting separated. With Single C, RRSO will not be needed because only a single service order will be issued.

4. Given the delay of Release 10.6, when will BST implement the Single C in the remaining 5 BST states?

BST Response:
The implementation date for Single C in the remaining 5 BST states remains unchanged. Single C will be implemented in AL and SC on 7/20/02. NC, KY and TN will be implemented on 8/3/02.

5. BST to redistribute list of 24 switches that require equipment changes as these are the switches the potential exists for service disruption to CLEC end users upon conversion to UNE P for which the CLEC is blamed, not BST.

BST Response:

See answer to #2. Again, these are the switches that require a change in equipment, which may result in a service interruption, when converting from a non-caller id service to a caller id capable UNE-P port.

6. BST to distribute revised user requirements based on answers provided to CLECs

BST Response:
BST will provide an addendum to the user requirements, which will reflect a log of all the questions/responses on CR0756. The addendum will be provided by no later than Friday, June 14, 2002.

7. BST to provide additional explanation as to when and why BST does not follow IntraLATA PIC as on LSR?

a. DA calls via OLNS are routed to BST's intraLATA when CLECs expect them to go to CLEC LPIC on LSR

b. Land to Mobile NXX

c. when BST is listed on CSR as LPIC even though CLEC sent themselves as LPIC - Is BST human error only reason for this occurrence?

BST Response:
The first scenario is a UNE-P originated call completed by a BellSouth operator through Directory Assistance Call Completion (DACC). Here the end user dials the BellSouth DA operator to request a telephone number and chooses to have the call completed to the number provided. Where the call is intralata, the call is routed over the BellSouth network.

In the Land-to-Mobile scenario, the UNE-P served end user is making a call to a BellSouth Land-to-Mobile customer. This is a reverse billed wireless interconnection service where all intralata calls originating from telephone numbers served by BellSouth and terminating to a Mobile Service Provider network are transported by BellSouth.

In the last scenario where the applied LPIC is different than the LPIC on the record, based on BellSouth's analysis, this is a result of human error and not the result of a system defect. If and when such errors are discovered, the information is sent to BellSouth's network organization and the proper LPIC is assigned.

8. BST to provide revised User Requirements for this CR756. When?

BST Response:
BST will provide an addendum to the user requirements, which will reflect a log of all the questions/responses on CR0756. The addendum will be provided by no later than Friday, June 14, 2002.

A follow-up meeting will be scheduled to review the User Requirements if the CLECs desire.

9. BST to communicate exactly what CREX7 in FL provides. What % of BST FL customers have this CREX7?

BST Response:
CREX7 restricts the following calls:

- Operator Assisted Calls: 0, 0+, 00, 101XXXX+0+
- Directory Assistance: 411, 1+411, 0+411, 1+555-1212, 1+NPA+555+1212
- N11 Services: 211, 311, 511, 711, 811, (611 in AL, KY, LA, MS, TN)
- Pay-per-Call: 1+900, 0+900, 976, 1+976, 101XXXX+1+900
- Long Distance: DDD 1+Interlata, 101XXXX+1+ (*allows DDD 1+Intralata)
- International Calling: 1DDD 01+, 1DDD 011+

BellSouth Interconnection Services does not have the information requested regarding the percentage of BellSouth retail customers with CREX7.

10. BST - please provide additional explanation to demonstrate how BST routes IntraLATA Toll calls (LPIC = 1+ calls) to the LPIC as submitted on the LSR in 8 other states, excluding GA. The answer BST provided to AT&T today, June 3rd, only addresses Local calling (7 & 10 digit) not BST's intraLATA Toll. Also need to better understand how BST's routing of CLEC expected 1+ IntraLATA calls as local impacts CLEC ODUF and ADUF files.

BST Response:
UNE-P originated intralata calls terminating outside of the service's 7 & 10 digit dialing scope shall be transported by the end user's LPIC, unless one of the conditions in question #7 is present. 1+ intralata calls shall be provided in ADUF files. If a CLEC expected a call to be 1+ dialed and transported by the end user's LPIC, it was not and it was dialed using 7 or 10 digits and transported by BellSouth, the call information shall be provided in an ODUF file.

Date: May 8, 2002

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR1). (Formerly Observation 140.)

Exception:

BellSouth is not classifying Change Requests as defects in accordance with the BellSouth definition of a Defect.

Background:

The BellSouth Change Control Process defines a defect as the following: "Any non type 1 change that corrects problems discovered in production version of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to CLECs. In addition, if functional requirements agreed on by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match, this will be addressed as a defect.[1]"

Issue:

During KPMG Consulting's review of BellSouth Change Requests, KPMG Consulting has found the following issues were opened by BellSouth and but not classified as a defect or not opened in any change request.

1. Defect 15369 – The BellSouth Systems do not auto clarify on incorrectly populated LSRS for a multi-line hunting partial disconnect. This has been reclassified as a feature.
2. Defect 15652 – The BellSouth systems do not auto clarify on orders that require changing of TN and listing on the same TN at the same time. This should result in a clarification, as such an order will prevent service order generation. This has been reclassified as a feature
3. Feature 9748 – LENS does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) information on xDSL orders submitted through LENS.

[1] Change Control Process, Version 2.6, 9/10/01, Page 42, available at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/ccp_bccp_guide.pdf

4. Help Desk issue – BellSouth identified the following error in TAG "COGAPI error doesn't get generated on COG. This is a default error that is produced from TAG when Orbix tries to communicate to SGG." No defect or feature was opened to address this issue.
5. Release 10.2 – BellSouth implemented release 10.2 on 11/3/01. BellSouth identified the errors in the release that caused 30% of CLEC orders to inappropriately reject[2]. The errors in release 10.2 are being addressed, but no defect has been opened to address these issues.

KPMP Consulting believes the issues listed above were incorrectly classified as features or were not addressed by any change request. Each of the above issues is the result of defects in either the user requirements or business rules, or result inoperable functionality and therefore should be classified as defects.

Impact:

BellSouth is required to provide workarounds and/or fixes for all Defect Change Requests within a specified timeframe. However, issues classified as features or not opened as any type of change request are not subject to any resolution timeframe. The lack of timely workarounds and resolutions to defects may result in the CLECs inability to efficiently execute transactions with BellSouth resulting in CLEC customer dissatisfaction.

BellSouth Response:

BellSouth is committed to appropriately identifying changes that impact CLECs by communicating them through CCP in accordance with the Change Control Process.

In the case of defects 15369 and 15652, they were rejected as defects since business rules/requirements do not exist to support the activity. Consequently, these items were returned with a request that a system enhancement (i.e., feature) be developed.

In the Change Control Process, an enhancement (i.e., feature) is a function, which has never been introduced into the system; improving or existing functions; required functional changes to system interfaces, data, or business rules; any change in the User Requirements in a production system.

System enhancement 9748 is currently undergoing internal analysis. If it is determined that the CLECs are impacted, this information will be communicated through CCP.

On October 1, 2001, a defect was opened to address the Help Desk issue. This defect is currently in the analysis phase, which should determine if it impacts CLECs. Again, if it

[2] Carrier notifications SN91082706 and SN91082611 available at http://www.interconnection.bellsouth.com/notifications/carrier/carrier_lett_01.html

is determined that the CLECs are impacted, this information will be communicated through CCP.

Regarding the implementation of release 10.2, in Carrier Notification, SN91082611, dated November 2, 2001, BellSouth communicated that "During testing, BellSouth determined that when there are two or more addresses reflected in RSAG, the LSR will be rejected or auto clarified back to the CLEC requesting a valid address."

The letter also acknowledged that effective, 11/17/2001, BellSouth would begin processing LSRs when a working address and a previous, non-working, address…is reflected in RSAG.

This issue was resolved on 11/17/01. Although a formal defect was not opened via CCP, BellSouth did communicate this issue through CCP via a Carrier Notification. BellSouth is committed to adhering to the Change Control Process.

BellSouth Amended Response:

The BellSouth internal features 15369 and 15652 were combined into one feature, which was submitted to CCP on 1/10/02 as expedited feature CR0606 Ordering Enhancements to Address Hunting. This feature is scheduled for implementation on 2/2/02 in Release 10.3.1. The User Requirements were reviewed with the CLECs on Wednesday, 1/23/02.

Enhancement 9748 does not require the CLEC to make coding changes since it is a LENS-based change. Although BellSouth initiated this feature internally, no decision has been made to pursue it. Discussions are still in progress. With the acceptance of the proposed revisions to the CLEC Affecting definition, CR0569, BellSouth has agreed to also submit changes that impact what a CLEC sees/receives if it is different than what is seen today. If it is determined that BellSouth wants to pursue this enhancement, it will be communicated to the CLECs through CCP.

The Help Desk Issue related to the TAG COGAPI error, discovered during CAVE testing, was determined to be a low impact defect. During certain LMU inquiries that CLECs submitted, they received a 'back end resource error limitation' message. When the inquiry was resubmitted, the CLEC received the desired result. This low impact defect was corrected in Release 10.3.1 on 1/5/02.

BellSouth is working on a defect management process to ensure that timeframes are established to support communicating information in a timely manner to CLECs. This includes defects discovered during CAVE testing that are not corrected before testing ends. BellSouth plans to discuss this new process with the CLECs at the February 27th CLEC Monthly Status meeting.

Timeframes established for validating defects are reflected in the following table:

CCP Documentation	Encore Documentation
High Impact: 4 hours	1 – Critical: 2 hours
Medium Impact: 1 business day	2 – Serious: 3 work days
Low Impact: 1 business day	3 – Moderate: 3 work days
	4 – Tolerable/Moderate: 3 work days

Timeframes for resolving defects are reflected in the following table:

	High Impact	Medium Impact	Low Impact
Open and validate	4 hours	1 business day	1 business day
Internal validation	1 business day	3 business days	3 business days
Develop workaround	1 business day	2 business days	3 business days
Internal resolution	10 business days (best effort)	90 days (best effort)	Best effort

The Change Control Process document (December 7, 2001 – page 43) indicates the above referenced intervals for Validation and Resolution Of a Type 6 Change – CLEC-impacting defect (excluding documentation).

BellSouth Second Amended Response:

BellSouth is re-educating its internal groups on the proper application of CCP guidelines with regard to the new definition of "CLEC-affecting" and the Type 6 Defect process. In addition, BellSouth is developing an internal document to address the procedures for negotiating "defect hand-offs" to internal groups. The target date for completing this document is mid to late April. BellSouth will notify KPMG of the specific date the document will be available. The new process will ensure that CLEC feature enhancements and defects are properly classified and communicated through the Change Control Process.

BellSouth Third Amended Response:

BellSouth submits the revised proprietary document entitled Type 6: Defect Notification Internal Process, initially submitted to KPMG on April 26, 2002.

Amended Issue:

During the Second Flow Through Retest, KPMG Consulting identified 66 PONs that did not properly flow through BellSouth's systems. As a result, KPMG Consulting issued Third Amended Exception 86[3] on April 8, 2002. BellSouth's response to Exception 86[4] indicates that BellSouth has identified system enhancements that will be necessary to correct the Flow through issues identified in Exception 86. During a review of the

[3] http://www.psc.state.fl.us/industry/telecomm/oss/exceptions.cfm
[4] Ibid.

BellSouth Change Control Process, KPMG Consulting found that BellSouth failed to follow the defect process, as outlined in the Change Control Process, version 2.8[5], with regard to issues identified in Exception 86. Specifically:

- BellSouth failed to correctly classify the issues identified in Exception 86 as defects. The issues identified in Exception 86 indicate that the BellSouth systems are not operating in accordance with the BellSouth Business Rules for Local Ordering. As a result, these issues should have been classified as defects, not as enhancements.

- BellSouth failed to open Type 6 Change Requests associated with the defects. Further, BellSouth failed to adhere to the intervals for validating and opening defects.

Impact:

BellSouth is required to provide workarounds and/or fixes for all Defect Change Requests within a specified timeframe. However, issues classified as features or not opened as any type of change request are not subject to any resolution timeframe. The lack of timely workarounds and resolutions to defects may result in the CLECs inability to efficiently execute transactions with BellSouth resulting in CLEC customer dissatisfaction.

[5] Now available in Change Control Process, version 2.9, Section 5.0 available at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/ccp_bccp_guide.pdf