

ORIGINAL

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DIRECT TESTIMONY OF

JAY M. BRADBURY

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.
AND TCG SOUTH FLORIDA, INC.

DOCKET NO. 000731-TP

NOVEMBER 16, 2000

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7 **NOVEMBER 16, 2000**

8
9 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

10 A. My name is Jay M. Bradbury. My business address is 1200
11 Peachtree Street, Suite 8100, Atlanta, Georgia 30309.

12
13 **Q. PLEASE DESCRIBE YOUR CURRENT POSITION AND**
14 **RESPONSIBILITIES.**

15 A. I am a District Manager in the AT&T Law and Government Affairs
16 organization, and I provide consulting support to AT&T's business
17 units and other internal organizations. In particular, I am involved in
18 the negotiation and implementation of interfaces for operational
19 support systems ("OSS") necessary to support AT&T's entry into the
20 local telecommunications market.

21
22 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**
23 **PROFESSIONAL EXPERIENCE.**

1 **A.** I graduated with a Bachelor of Arts degree in History from The Citadel
2 in 1966. I have taken additional undergraduate and graduate courses
3 at the University of South Carolina and Georgia State University in
4 Business and Economics. In 1987 and 1988, I participated in
5 Advanced Management Programs at Rutgers University and the
6 University of Houston. I earned a Masters Certificate in Project
7 Management from Stevens Institute of Technology in 2000.
8 I began my AT&T career in 1970 as a Chief Operator with Southern
9 Bell's Operator Services Department in Raleigh, North Carolina. From
10 1972 through 1987, I held various positions within Southern Bell's
11 (1972 - 1984) and AT&T's (1984 - 1987) Operator Services
12 Departments where I was responsible for the planning, engineering,
13 implementation and administration of personnel, processes and
14 network equipment used to provide local and toll operator services
15 and directory assistance services in North Carolina, South Carolina,
16 Kentucky, Tennessee and Mississippi.
17 In 1987, I transferred to AT&T's External Affairs Department in
18 Atlanta, Georgia where I was responsible for managing AT&T's needs
19 for access network interfaces with South Central Bell, including the
20 resolution of operational performance, financial and policy issues.
21 From 1989 through November 1992, I was responsible for AT&T's
22 relationships (including the negotiation and administration of billing
23 and marketing contracts, card honoring contracts, facility contracts,

1 and the support of sales of Network Systems products) with
2 Independent Telephone Companies within the South Central Bell
3 States and Florida. From November 1992 through April 1993, I was a
4 Regulatory Affairs Manager in the Law and Government Affairs
5 Division and was responsible for the analysis of industry proposals
6 before regulatory bodies in the South Central States to determine their
7 impact on AT&T's ability to meet its customers' needs with services
8 that are competitively priced and profitable.
9 In April of 1993, I transferred to the Access Management Organization
10 within AT&T's Network Services Division as a Manager - Access
11 Provisioning and Maintenance with responsibilities for on-going
12 management of processes and structures in place with Southwestern
13 Bell to assure that their access provisioning and maintenance
14 performance met the needs of AT&T's Strategic Business Units. In
15 August 1995, I became responsible for the negotiation and
16 implementation of interfaces for operational support systems (OSS)
17 necessary to support AT&T's entry into the local telecommunications
18 market in the BellSouth states. I assumed my current position in June
19 1998.

20

21 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

22 **A.** My testimony explains and supports AT&T's requests for the following
23 services from BellSouth:

1 a) A two-part procedure for ordering Operator
2 Services/Directory Assistance ("OS/DA") in conjunction with
3 loop-port combinations as a UNE (Issue 25);
4
5 b) That the BellSouth OS/DA service ordered by AT&T be
6 provided as a UNE at UNE rather than market based prices.
7 (Issue 23);
8
9 c) A robust Change Control Process (Issue 30);
10
11 d) Specific improvements to BellSouth's pre-ordering and
12 ordering interfaces (Issue 31); and
13
14 e) Specific improvements to BellSouth's maintenance and
15 repair interfaces (Issue 32).
16
17 My testimony demonstrates that the OSS interfaces, processes and
18 functions currently offered by BellSouth do not comply with the
19 Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56
20 (1996) (hereinafter the "1996 Act") and its implementing regulations,
21 and explains AT&T's need for and entitlement to the services
22 requested from BellSouth.
23

1 **Q. PLEASE DESCRIBE FURTHER THE ISSUES THAT YOUR**
2 **TESTIMONY WILL COVER.**

3 **A.** In Issue 25, AT&T requests a specific two-part procedure for ordering
4 Operator Services/Directory Assistance (“OS/DA”) in conjunction with
5 loop-port combinations (the Unbundled Network Element Platform or
6 UNE-P). AT&T has requested a process by which it would place a
7 combination of two orders. First, AT&T would place an Infrastructure
8 Provisioning Order (or “footprint order”) that would identify a specific
9 geographic area (such as end office, rate center, LATA or state) and
10 also would specify the network elements that AT&T would require in
11 order to offer service throughout that area. Among other things, the
12 Infrastructure Order would include AT&T’s selection of OS/DA routing
13 for loop-port and resale service customers calls to either (1)
14 BellSouth’s OS/DA systems on a branded or unbranded basis, or to
15 (2) another system of AT&T’s choosing. Thereafter, AT&T would
16 place Customer-Specific Provisioning Orders, which would identify the
17 particular features required by a specific new customer. These
18 customer-specific orders should receive electronic processing without
19 subsequent manual handling by BellSouth personnel. I shall refer to
20 this issue as the Footprint-OS/DA Issue.

21

22 In Issue 23, AT&T requests that BellSouth OS/DA (either AT&T
23 branded or unbranded) ordered by AT&T using the process described

1 in Issue 25 be provided as a UNE at UNE rates. In its UNE Remand
2 Order, the FCC clearly requires customized routing as a pre-condition
3 to allowing BellSouth not to offer OS/DA as a UNE. BellSouth does
4 not provide customized routing through a commercially viable, timely,
5 repeatable process and thus is required to offer and charge for OS/DA
6 as a UNE, rather than at market based rates. I shall refer to this issue
7 as the OS/DA Price Issue.

8
9 In Issue 30, AT&T requests a comprehensive Change Control
10 Process, which BellSouth has failed to provide to date. Without a
11 comprehensive process that is both well documented and followed by
12 BellSouth once established, to handle changes that BellSouth makes
13 to its interfaces and processes, and to their supporting documentation
14 (such as specifications, business rules, methods and procedures),
15 AT&T cannot make corresponding changes in its own interfaces and
16 processes, and its customers repeatedly encounter delay and
17 frustration. I shall refer to this issue as the Change Control Process
18 Issue.

19
20 In Issue 31, AT&T requests a number of OSS improvements that have
21 been at issue between the companies for some time. Although
22 repeatedly requested by AT&T, BellSouth has yet to provide AT&T
23 with the OSS functionality it provides to itself that supports the quality

1 of service enjoyed by BellSouth's retail customers. I shall refer to this
2 issue as the Equivalent Functionality Issue.

3

4 In Issue 32, AT&T requests a full function, machine-to-machine,
5 integrateable Maintenance and Repair interface. Such an interface is
6 technically feasible and has been an issue between the companies
7 and before this Commission and the FCC for a number of years. I
8 shall refer to this issue as the Maintenance and Repair Access Issue.

9

10

BACKGROUND

11

OPERATIONS SUPPORT SYSTEMS OBLIGATIONS UNDER THE ACT

12

13 **Q. WHAT ARE OPERATIONS SUPPORT SYSTEMS ("OSS")?**

14 **A.** Operations support systems are the computer-based systems,
15 information, databases and personnel that telecommunications
16 carriers use to perform essential customer and business support
17 functions, including pre-ordering, ordering, provisioning, maintenance
18 and repair, and billing. Computer-based OSS enable
19 telecommunications carriers to transmit data electronically between
20 different systems, thereby maximizing efficiency and effectiveness in
21 the performance of these essential support functions. In addition to
22 computer-based systems, information and databases, OSS also
23 includes any necessary manual processes performed by personnel

1 located in various types of “centers” when computer-based processes
2 have not been provided or are not available. In short, good computer-
3 based processes are not enough – BellSouth also is obligated to
4 provide, on a nondiscriminatory basis, the manual processes involved
5 in operating essential support functions.

6

7 **Q. WHY DOES YOUR TESTIMONY DISCUSS BELLSOUTH’S**
8 **MANUAL PROCESSES AND MANUAL WORK CENTERS? ARE**
9 **NOT ALL OF BELLSOUTH’S OSS COMPUTER-BASED**
10 **PROCESSES?**

11 **A.** No, not all of BellSouth’s OSS are computer-based systems. The
12 word “system” is synonymous with neither computers nor electronic
13 interfaces. BellSouth’s work centers and the manual procedures
14 used by service representatives also are “systems.” Although
15 BellSouth has an obligation to develop, implement and deploy
16 electronic interfaces for all OSS functionalities equal to those it uses
17 itself, it has not yet happened and may not happen for some
18 considerable time. Moreover, BellSouth must provide
19 nondiscriminatory operations support processes for pre-ordering,
20 ordering, provisioning, maintenance and repair, and billing, regardless
21 of whether or not electronic interfaces have been implemented. As
22 long as BellSouth uses manual processes as well as computer-based

1 processes for these functions, this Commission should ensure all such
2 processes are provided to competitors on a nondiscriminatory basis.

3

4 **Q. HAS THE FEDERAL COMMUNICATIONS COMMISSION ("FCC")**
5 **ADDRESSED ACCESS TO OSS UNDER THE ACT?**

6 **A.** Yes. The FCC "conclude[d] that OSS and the information they
7 contain fall squarely within the definition of 'network element' and must
8 be unbundled upon request under section 251(c)(3)" First Report
9 and Order, Implementation of the Local Competition Provisions of the
10 Telecommunications Act of 1996, 11 FCC Rcd. 15499 at ¶ 516
11 (1996), aff'd in part and vacated in part by Iowa Utils. Bd. v. FCC, 120
12 F.3d 753 (8th Cir. 1997), aff'd in part and rev'd in part by AT&T Corp.
13 v. Iowa Utils. Bd., 119 S. Ct. 721 (1999), hereinafter "FCC Local
14 Competition Order". The FCC reiterated this important requirement in
15 various proceedings conducted pursuant to Section 271 of the Act:
16 Memorandum Opinion and Order, Application of BellSouth Corp., et
17 al. Pursuant to Section 271 to Provide In-Region, InterLATA Services
18 in South Carolina, 13 FCC Rcd. 539 (1997), hereinafter "FCC South
19 Carolina Order" and Memorandum Opinion and Order, Application of
20 BellSouth Corporation, et al. for Provision of In-Region, InterLATA
21 Services in Louisiana, 13 FCC Rcd. 20599 (1998), hereinafter "FCC
22 Louisiana II Order".

23

1 In addition, the FCC concluded that OSS functions are subject to the
2 duty imposed by Section 251(c)(3) on incumbent local exchange
3 carriers ("LEC") to provide nondiscriminatory access to network
4 elements, and the duty imposed by Section 251(c)(4) to provide resale
5 services under just, reasonable, and nondiscriminatory conditions.
6 FCC Local Competition Order ¶ 517; FCC South Carolina Order ¶ 83;
7 and FCC Louisiana II Order ¶ 84. The FCC recognized that a
8 "competing carrier that lacks access to operations support systems
9 equivalent to those the incumbent LEC provides to itself, its affiliates,
10 or its customers, 'will be severely disadvantaged, if not precluded
11 altogether, from fairly competing.'" FCC South Carolina Order ¶ 82;
12 see also FCC Local Competition Order ¶ 518; FCC Louisiana II Order
13 ¶ 80. The FCC reiterated these principles in its recent reviews of the
14 Bell Atlantic and Southwestern Bell applications to enter the interLATA
15 long distance market. Memorandum Opinion and Order, Application
16 by Bell Atlantic New York for Authorization Under Section 271 of the
17 Communications Act To Provide In-Region, InterLATA Service in the
18 State of New York, CC Dkt. No. 99-295, FCC 99-404 at ¶ 83, 1999
19 WL 1243135 (rel. Dec. 22, 1999), hereinafter "FCC BA-NY Order";
20 Memorandum Opinion and Order, Application by SBC
21 Communications, Inc., Southwestern Bell Telephone Company, and
22 Southwestern Bell Communications Services, Inc., d/b/a

1 Southwestern Bell Long Distance, CC Dkt. 00-65, FCC 00-238 at
2 ¶ 92, ,hereinafter "FCC Texas SWBT Order".

3

4 **Q. HAS THE FCC EXPLAINED WHAT CONSTITUTES**
5 **NONDISCRIMINATORY ACCESS?**

6 **A.** Yes. In its Interconnection Order, the FCC found that
7 nondiscriminatory access "necessarily includes access to the
8 functionality of any internal gateway systems the incumbent employs
9 in performing [pre-ordering, ordering, provisioning, maintenance and
10 repair, and billing] functions for its own customers." FCC Local
11 Competition Order ¶ 523 (emphasis added). The FCC defined
12 "internal gateway system" as "any electronic interface the incumbent
13 LEC has created for its own use in accessing support systems for
14 providing pre-ordering, ordering, provisioning, repair and
15 maintenance, and billing." FCC Local Competition Order ¶ 523, n.
16 1274. Examples of internal gateway systems that BellSouth uses in
17 Florida are the Regional Negotiation System ("RNS"), the Regional
18 Ordering System ("ROS"), and the Trouble Analysis Facilitation
19 Interface ("TAFI"). Accordingly, BellSouth must provide AT&T with
20 nondiscriminatory access to the functionalities of RNS, ROS, TAFI,
21 and other internal gateway systems.

22

1 The FCC discussed in greater detail the incumbent LEC's obligation to
2 provide nondiscriminatory access to OSS functions in its various
3 orders on Section 271 applications from BellSouth and other Regional
4 Bell Operating Companies ("RBOCs"). The FCC explained that
5 incumbent LECs must provide access to OSS functions that
6 sufficiently support each of the three modes of competitive entry
7 strategies established by the Act (interconnection, unbundled network
8 elements, and services offered for resale) and must not favor one
9 strategy over another. Memorandum Opinion and Order, Application
10 of Ameritech Michigan Pursuant to Section 271 to Provide In-Region,
11 InterLATA Services in Michigan, 12 FCC Rcd. 20543 at ¶ 133 (1997),
12 (hereinafter "FCC Ameritech Order").

13
14 The FCC found that "[f]or those OSS functions that are analogous to
15 OSS functions that an incumbent LEC provides to itself -- including
16 pre-ordering, ordering and provisioning for resale services -- a BOC
17 must offer access to competing carriers equivalent to the access the
18 BOC provides itself." FCC South Carolina Order ¶ 98; see also FCC
19 Ameritech Order ¶ 139. The FCC also found that "access to OSS
20 functions must be offered such that competing carriers are able to
21 perform OSS functions in 'substantially the same time and manner' as
22 the BOC." FCC South Carolina Order ¶ 98; see also FCC Louisiana II
23 Order ¶ 87.

1 In addition, the FCC found that "for those OSS functions that have no
2 retail analogue, such as ordering and provisioning of unbundled
3 network elements, a BOC must offer access sufficient to allow an
4 efficient competitor a meaningful opportunity to compete." FCC South
5 Carolina Order ¶ 98; see also FCC Ameritech Order ¶ 141; FCC
6 Louisiana II Order ¶ 87; FCC BA-NY Order ¶ 83, and FCC Texas
7 SWBT Order ¶ 95.

8
9 The FCC also found "that excessive reliance on manual processing,
10 especially for routine transactions, impedes the BOC's ability to
11 provide equivalent access." FCC Louisiana II Order ¶ 110. Manual
12 processing by BellSouth results in delay and increased error in the
13 fulfillment of customer's orders which negatively impacts AT&T's
14 ability to compete with BellSouth in providing service to its customers
15 in substantially the same time and manner as BellSouth.

16
17 AT&T is particularly concerned about the high number of orders
18 placed electronically that "fall out" of the electronic processing system
19 as a result of BellSouth's design decisions not to provide complete
20 electronic processing for all elements and services purchased by
21 alternative local exchange companies ("ALECs") and the failure of
22 BellSouth's systems to properly process transactions for which they
23 have been designed. Orders for which electronic processing has not

1 been provided or that “fall out” of BellSouth’s systems due to system
2 failure are processed manually by individual employees in one of
3 BellSouth’s two Local Carrier Service Centers (“LCSCs”). Individual
4 employees tend to interpret BellSouth’s business rules subjectively,
5 which results in varying treatment of similar orders. For example,
6 some orders will be rejected, while similar orders will not, based
7 simply on the subjective decision of a BellSouth employee. Orders
8 that electronically flow through BellSouth’s ordering system, on the
9 other hand, are treated the same way and are rejected or processed
10 on a consistent basis. Thus, a high “fall out” rate (and conversely, a
11 low flow-through rate) results in a greater number of problem orders.
12 Additionally, the FCC has recognized that low order flow-through can
13 “indicate a wide range of possible deficiencies in a BOC’s OSS that
14 may deny an efficient competitor a meaningful opportunity to compete
15 in the local market.” FCC BA-NY Order ¶ 162.

16

17 **Q. WHAT ARE THE CHARACTERISTICS OF AN INTERFACE THAT**
18 **PROVIDES NONDISCRIMINATORY ACCESS TO AN INCUMBENT**
19 **LEC’S OSS?**

20 **A.** For an interface to satisfy the Act’s nondiscrimination requirements,
21 the FCC consistently has indicated that the interface must
22 demonstrate, at a minimum, the characteristics described below.
23 Additionally, appropriate operational data and performance

1 measurements are necessary to determine whether the proposed
2 OSS interfaces meet these five characteristics. See FCC Ameritech
3 Order ¶¶ 138, 141-42, 204-213; FCC BA-NY Order ¶ 89. An
4 interface with the following characteristics of nondiscrimination will
5 minimize differences in OSS functional capabilities between the
6 incumbent LEC and the ALEC:

7
8 **Electronic** -- The interface must be a machine-to-machine
9 interface (computer application program to computer
10 application program) that provides fully electronic interaction
11 between the incumbent LEC's OSS and the ALEC's OSS. FCC
12 South Carolina Order ¶¶ 152-66. A machine-to-machine
13 interface decreases the time, reduces the cost, and improves
14 the accuracy of an ALEC's performance of OSS functions (FCC
15 Louisiana II Order ¶ 96, n. 291), while failure to deploy an
16 application-to-application interface denies competing carriers
17 equivalent access to pre-ordering OSS functions. FCC South
18 Carolina Order ¶ 166; FCC BA-NY Order ¶ 137.

19
20 **Functionality** -- The interface must provide all ALECs with the
21 capability to perform the same OSS functions with at least the
22 same level of quality, efficiency, and effectiveness that the
23 incumbent provides to itself. FCC Local Competition Order ¶

1 523; FCC South Carolina Order ¶ 98; FCC Ameritech Order ¶
2 139; and FCC Louisiana II Order ¶ 87. For those functions that
3 do not have a retail analogue, the incumbent LEC must offer
4 access to such OSS functions sufficient to allow an efficient
5 competitor a meaningful opportunity to compete. FCC South
6 Carolina Order ¶ 98; FCC Louisiana II Order ¶ 87; FCC BA-NY
7 Order ¶ 129 and FCC Texas SWBT Order ¶ 148

8
9 **Documented** -- The interface must be documented accurately,
10 adequately and sufficiently in advance to allow ALECs a
11 reasonable opportunity to develop and deploy their own
12 necessary systems, work processes, and employee training to
13 use the interface. FCC South Carolina Order ¶ 111; FCC
14 Ameritech Order ¶ ¶ 137, 215; FCC Louisiana II Order ¶ 85;
15 FCC BA-NY Order ¶ 88; and FCC Texas SWBT Order ¶ 97.
16 Properly documented interfaces will facilitate completion of
17 those necessary tasks in a manner that provides ALECs a
18 meaningful opportunity to compete.

19
20 **Capacity** -- The interface must have the capacity to meet
21 combined market volumes of all ALECs with response times
22 that are equivalent to those the incumbent LEC provides itself.
23 FCC Ameritech Order ¶ ¶ 137, 194; FCC Louisiana II Order

1 ¶¶ 139-40; FCC BA-NY Order ¶ 88; and FCC Texas SWBT
2 Order ¶ 97. Sufficient capacity will ensure that OSS interfaces
3 do not become a bottleneck that impedes an ALEC's ability to
4 compete.

5

6 **Standards** -- The interface must comply with existing
7 telecommunications industry standards or ease the transition to
8 evolving standards regarding:

9 • What is to be communicated (message protocol
10 component);

11 • Specific information to be communicated (data
12 elements); and

13 • language and rules for communication
14 (communication protocols).

15 Although the use of industry standards can meet the needs of a
16 competitive local exchange market, FCC Ameritech Order ¶
17 217; FCC BA-NY Order ¶ 88, lack of industry standards does
18 not excuse an incumbent LEC from meeting its obligation to
19 provide nondiscriminatory access to OSS functions. FCC
20 South Carolina Order ¶ 121, n. 362. Similarly, deploying an
21 interface that merely adheres to industry standards is not
22 sufficient to demonstrate nondiscriminatory access. A BOC
23 must provide nondiscriminatory access to its OSS functions

1 irrespective of the existence of, or whether it complies with,
2 industry standards. FCC Louisiana II Order ¶ 137.

3

4 **ISSUE 25 THE FOOTPRINT-OS/DA ISSUE**

5

6 **Q. SHOULD THERE BE A SET PROCESS BY WHICH AT&T CAN**
7 **OBTAIN FROM BELL SOUTH BOTH THE COMMON**
8 **(INFRASTRUCTURE) AND CUSTOMER-SPECIFIC UNES THAT**
9 **COMPRISE OS/DA ROUTING IN ASSOCIATION WITH THE UNE**
10 **PLATFORM?**

11 **A.** Yes. In Issue 25, AT&T requests a specific two-part procedure for
12 ordering loop-port combinations (the Unbundled Network Element
13 Platform or UNE-P)¹, including the associated Operator
14 Services/Directory Assistance routing. AT&T has requested a process
15 by which it would place a combination of two orders. First, AT&T may
16 establish routing of calls to a specific Operator Services / Directory
17 Assistance (“OS/DA”) service or provider on a “footprint” basis which
18 may be as small as a single central office, or as large as an entire
19 state. Thereafter, AT&T would place Customer-Specific Provisioning

¹ The Unbundled Network Element Platform consists of the combination of a UNE loop that provides connectivity between a customer’s location and a BellSouth central office and a UNE port that provides access to the switching functionality available in that central office, including local, long distance and ancillary calling. The UNE-P purchaser takes on additional business relationships with other ALECs, Independent Companies, Inter-exchange Carriers, BellSouth, and other vendors including the associated financial risks. These relationships and risks are not associated with resale of BellSouth’s local services.

1 Orders, which would identify the particular features required by a
2 specific new customer.

3

4 The Local Service Request (“LSR”) would act as the Customer-
5 Specific Provisioning Order. AT&T should be able to electronically
6 submit LSRs for UNE-P, and the orders should electronically flow
7 through BellSouth’s systems and be provisioned at parity with
8 BellSouth retail. As discussed below, electronic LSRs with flow-
9 through ordering should be available for orders that request either an
10 unbranded or an AT&T-branded platform.

11

12 **Q. PLEASE DESCRIBE THE OPTIONS FOR ROUTING OS/DA CALLS.**

13 A. When an AT&T customer picks up the telephone and dials “0” for
14 operator service or “411” for directory assistance, the call will be
15 directed to the OS/DA platform chosen by AT&T. The call could be
16 routed in one of four possible ways: ²

- 17 • BellSouth’s OS/DA platform, to be branded as BellSouth’s
18 service (“Welcome to BellSouth”). AT&T will not use this option
19 as a long term solution.
- 20 • BellSouth’s platform to be branded as the ALEC’s service
21 (“Welcome to AT&T”);

² Exhibit JMB-1 visually depicts how these alternatives are provided using the three offered technologies – Line Class Codes, Originating Line Number Screening and Advanced Intelligent Newtork.

- 1 • BellSouth's platform but not branded at all ("May I help
2 you?");
- 3 • or it could be sent to AT&T's or another provider's OS/DA
4 platform.

5 AT&T is entitled to select the routing for its customers' OS/DA calls,
6 and may decide to have more than one routing option within Florida.

7

8 **Q. HOW DOES AT&T PROPOSE TO ACCOMPLISH ITS DESIRED**
9 **ROUTING?**

10 **A.** There are two steps necessary to accomplish AT&T's desired routing.
11 These steps are illustrated in Exhibit JMB-2. First, BellSouth and
12 AT&T must agree upon a process for ordering the trunking and
13 translations that support customized routing. Next, AT&T must inform
14 BellSouth which routing option it has chosen to use for a specific new
15 customer. Unfortunately, both of these steps are the subject of
16 dispute between the parties. I will discuss each step separately.

17

18 **Q. PLEASE DESCRIBE THE FIRST STEP FOR OBTAINING AT&T'S**
19 **DESIRED CUSTOMIZED ROUTING.**

20 **A.** As stated above, the first step in obtaining AT&T's desired customized
21 OS/DA routing is for BellSouth and AT&T to agree upon a process for
22 ordering customized routing. AT&T has requested a two-part ordering
23 process. First, AT&T would submit to BellSouth a "footprint" order

1 (also known as a network design request, or “NDR”) that would
2 identify the trunking and routing required to direct customers’ OS/DA
3 calls to the platform or platforms chosen by AT&T for the footprint
4 area. In Florida, for example, AT&T might place a footprint order for
5 two OS/DA routing options in the major metropolitan end offices (one
6 routing to BellSouth’s platform, branded as AT&T, and another to
7 AT&T’s own platform), and a separate footprint order for the other end
8 offices in the state, specifying only one routing option (to BellSouth’s
9 platform, branded as AT&T).

10

11 Later, when AT&T ordered service for a specific new customer, it
12 would do so by electronically submitting a Local Service Request
13 (“LSR”), which should, in turn, be electronically processed by
14 BellSouth. If AT&T’s footprint order had specified more than one
15 OS/DA routing option for the area in which service was to be provided,
16 AT&T’s LSR would indicate which of the two routing options to use for
17 that customer. No such indicator would be necessary if AT&T had
18 requested only one routing option for the area. In the above example,
19 then, an AT&T LSR for a new customer outside a major metropolitan
20 area would include no indicator, because the single routing
21 information already would have been provided to BellSouth. AT&T
22 LSR for a new customer in a major metropolitan area, on the other
23 hand, would indicate which of the two previously-identified routing

1 options to use for that specific customer. This would allow AT&T the
2 ability, for example, to route OS/DA calls from metropolitan residential
3 customers to BellSouth's platform branded as AT&T, and calls from
4 metropolitan business customers to AT&T's platform.

5

6 **Q. YOU MENTIONED THAT THIS STEP WAS THE SUBJECT OF**
7 **DISPUTE. PLEASE DESCRIBE THE DISPUTE AND AT&T'S**
8 **POSITION.**

9 **A.** There are two areas of disagreement related to this step of the
10 process. First, despite repeated requests by AT&T, BellSouth has
11 failed to provide detailed technical information on the process
12 BellSouth would require in order to implement each of the three
13 OS/DA routing strategies that AT&T may use. In the past, BellSouth
14 has stated its willingness to provide the information to AT&T, but has
15 not produced detailed technical methods and procedures sufficient to
16 inform AT&T of requirements for ordering customized routing.³
17 Without this information, AT&T cannot develop the internal systems
18 and processes it will need to submit orders to BellSouth. AT&T asks
19 this Commission to order BellSouth to provide such documentation by
20 a date certain.

21

³ As indicated by the FCC in paragraph 223 of its Second Louisiana Order, AT&T has been attempting to get this information for over two years.

1 Recently a BellSouth witness stated that BellSouth had provided
2 AT&T with all the necessary information in an E-mail transmittal sent
3 on October 26, 2000. Unfortunately, that witness had been
4 misinformed. The only information provided was proposed contract
5 language that still provides none of the requested technical or
6 methods and procedures documentation. Exhibit JMB-3.
7
8 Next, BellSouth wishes to limit AT&T to only one customized OS/DA
9 route, apparently for the entire nine-state region. There simply is no
10 justification for doing so in the Telecommunications Act or in FCC
11 orders. The FCC has determined that incumbent LECs, including
12 BellSouth, are required to provide customized routing as part of the
13 switching function, unless they can prove that customized routing in a
14 particular switch is not technically feasible. FCC Local Competition
15 First Report and Order, 11 FCC Rcd at 15709. At no time during
16 negotiations has BellSouth indicated that customized routing was not
17 technically feasible in any of its switches.
18
19 Further, the FCC has not limited BellSouth's obligation to provide
20 OS/DA routing on a "one per ALEC" basis. Although BellSouth claims
21 that certain language in paragraph 224 of the FCC's Second
22 Louisiana Order implies that ALECs would have one routing plan on a
23 region-wide basis, an examination of that paragraph reveals exactly

1 the opposite: The FCC anticipated that ALECs may have more than
2 one OS/DA routing option, and instructed BellSouth to simplify its
3 ordering processes accordingly:

4 We agree with BellSouth that a competitive LEC
5 must tell BellSouth how to route its customers'
6 calls. If a competitive LEC wants all of its
7 customers' calls routed in the same way, it should
8 be able to inform BellSouth, and BellSouth should
9 be able to build the corresponding routing
10 instructions into its systems just as BellSouth has
11 done for its own customers. (Footnote 705) If,
12 however, a competitive LEC has more than one
13 set of routing instructions for its customers, it
14 seems reasonable and necessary for BellSouth to
15 require the competitive LEC to include in its order
16 an indicator that will inform BellSouth which
17 selective routing pattern to use. (Footnote 706)
18 BellSouth should not require the competitive LEC
19 to provide the actual line class codes, which may
20 differ from switch to switch, if BellSouth is capable
21 of accepting a single code region-wide. (FCC
22 Second Louisiana Order at ¶ 224, emphasis
23 added.)

1 The footnotes are equally instructive: Footnote 705 discusses the
2 possibility that AT&T might want all its customers' calls routed in a
3 single fashion:

4 For example, if AT&T wants all of its customers'
5 calls routed to AT&T's operator services and
6 directory assistance, AT&T should be able to tell
7 this to BellSouth once, by letter for instance, and
8 BellSouth should be able to route the calls without
9 requiring AT&T to indicate this information on
10 every order.

11

12 Footnote 706, on the other hand, discusses the possibility that AT&T
13 may desire more than one OS/DA routing option:

14 For example, if AT&T wants some of its operator
15 services and directory assistance calls routed to
16 its operator services and directory assistance
17 platform, but it wants other operator service and
18 directory assistance calls directed to BellSouth's
19 platform, BellSouth does not know whether to
20 route AT&T's customers' calls to AT&T's platform
21 or its own unless AT&T tells BellSouth which
22 option it is choosing.

23

1 BellSouth theorizes that this paragraph (224) implies that AT&T is
2 limited to one “default” OS/DA routing option. The FCC’s plain
3 language reveals that BellSouth is wrong.
4 BellSouth has the ability to direct its own customers’ OS/DA calls to
5 different platforms, if it so desired. AT&T is entitled to access this
6 ability and to direct its customers’ calls in any way that is technically
7 feasible.

8
9 **Q. YOU STATED THAT THE NEXT STEP IN THE PROCESS WAS**
10 **FOR AT&T TO INFORM BELL SOUTH WHICH ROUTING OPTION IT**
11 **HAS CHOSEN TO USE FOR A SPECIFIC NEW CUSTOMER ONCE**
12 **BELL SOUTH HAS IMPLEMENTED ALL THE AT&T REQUESTED**
13 **ROUTING OPTIONS. PLEASE DESCRIBE THE DISPUTE**
14 **RELATED TO THIS ISSUE.**

15 **A.** AT&T and BellSouth disagree about the method by which AT&T will
16 identify the OS/DA routing option it has selected for individual
17 customers. I will therefore describe the method by which AT&T plans
18 to identify its desired OS/DA routing option for each customer, and
19 demonstrate that this method is consistent with (and contemplated by)
20 the FCC in its Second Louisiana Order. I also will explain that the
21 process urged by BellSouth violates FCC guidelines and effectively
22 would limit AT&T to only one OS/DA routing option.

23

1 **Q. PLEASE DESCRIBE AT&T’S DESIRED ORDERING METHOD.**

2 A. As I explained above, AT&T will first place a footprint order specifying

3 its desired OS/DA routing options within a geographic area. Later, it

4 will submit customer-specific LSRs. If the footprint order specified

5 only one OS/DA routing within the geographic footprint (for example,

6 sending all OS/DA calls to BellSouth’s unbranded OS/DA platform),

7 AT&T will have provided BellSouth with routing instructions for all

8 LSRs submitted within that footprint, so there is no need for AT&T to

9 place additional information on the customer-specific LSR to reiterate

10 the OS/DA routing. This is in keeping with the FCC’s reasoning in its

11 Second Louisiana Order at footnote 705:

12 If AT&T wants all of its customers' calls routed to

13 AT&T's operator services and directory

14 assistance, AT&T should be able to tell this to

15 BellSouth once, by letter for instance, and

16 BellSouth should be able to route the calls without

17 requiring AT&T to indicate this information on

18 every order.

19

20 AT&T’s footprint order/ customer-specific order process is designed to

21 comply with this guidance.

22

1 If, on the other hand, If AT&T places a footprint order that specifies
2 two possible OS/DA routing options, then AT&T's LSR must inform
3 BellSouth which of the two options to use for each specific customer.
4 AT&T wishes to do so by placing an indicator on the LSR, which could
5 be accomplished by simply completing the existing feature field in the
6 LSR with (for example) "UB/BLS" for BellSouth unbranded, "CB/BLS"
7 for BellSouth branded as AT&T or "C/AOSR" for another provider's
8 platform. The indicator for each option should be the same region-
9 wide. Again, this is consistent with the FCC's Second Louisiana Order
10 at ¶224, footnote omitted:

11 If, however, a competitive LEC has more than one
12 set of routing instructions for its customers, it
13 seems reasonable and necessary for BellSouth to
14 require the competitive LEC to include in its order
15 an indicator that will inform BellSouth which
16 selective routing pattern to use. BellSouth should
17 not require the competitive LEC to provide the
18 actual line class codes, which may differ from
19 switch to switch, if BellSouth is capable of
20 accepting a single code region-wide.

21

1 **Q. IS BELLSOUTH CAPABLE OF ACCEPTING A SINGLE REGION-**
2 **WIDE CODE FOR EACH OF THE OS/DA ROUTING OPTIONS**
3 **REQUESTED BY AT&T?**

4 **A.** Yes, BellSouth is quite capable of accepting a single region-wide
5 code, or indicator, for each of the three OS/DA routings that may be
6 requested by AT&T, and has never attempted to demonstrate that it is
7 not. In order to do so, BellSouth simply would have to build
8 translations tables for line class codes, as it has done already for its
9 own use.

10

11 **Q. PLEASE EXPLAIN.**

12 **A.** Line class codes ("LCCs") and routing instructions are applied at the
13 central office level and are contained within each office's software
14 data tables. Exhibit JMB-1, page 1, depicts the use of LCCs to
15 implement customized OS/DA routing for ALECs. The actual codes
16 and data tables, however, are not uniform between central offices.⁴
17 Thus, the line class codes for ordering (for example) customized
18 OS/DA routing to BellSouth's unbranded platform may vary among
19 central offices, even though they provide the same instructions to the
20 switch. Only in recent years have the RBOCs, including BellSouth,
21 established methods and procedures to improve the administration

⁴ Part of the problem associated with LCCs and their administration is the fact that prior to the Act there was no need to administer LCCs in a manner that would allow them to be used in a competitive market. Thus, there was no need to create a system of uniform LCCs, and it was not done.

1 and commonality of LCCs. BellSouth solves this problem for itself
2 with a database known as the Line Class Code Assignment Module
3 (“LCCAM”). LCCAM determines, from the information on the retail
4 service request, and the identification of the central office that will be
5 used to serve the customer’s line, the proper LCC to put on the
6 service order.

7

8 The FCC was fully aware that LCC identifiers may be unique to central
9 offices, and decided that requiring ALECs to enter each individual
10 code on their orders would be an unreasonable burden. FCC Second
11 Louisiana Order ¶ 224. The FCC set forth two alternatives by which
12 competitors may order customized OS/DA routing. If a competitive
13 provider wants all of its OS/DA calls routed in the same fashion, it may
14 inform BellSouth once, perhaps by letter, without the need to indicate
15 this information on each customer’s order. If, on the other hand, the
16 provider wants more than one set of routing instructions for its
17 customers, the ALEC should provide “an indicator” on each
18 customer’s order that tells BellSouth which routing pattern to use for
19 that customer. FCC Second Louisiana Order ¶ 224. As stated
20 above, the FCC directed BellSouth to accept a single code across its
21 region for each set of routing instructions desired by an ALEC.

22

1 The processes and procedures requested by AT&T are logical,
2 technically possible, and in accord with FCC orders. BellSouth
3 misreads the FCC's guidance in an attempt to force a single "dictated"
4 OS/DA routing method on AT&T rather than provide the required
5 customized routing. The Commission should not be misled by
6 BellSouth's abuse of the FCC's guidance, but should instead order
7 BellSouth to provide the information, methods and procedures AT&T
8 needs to determine and eventually order the customized OS/DA
9 routing it desires, using the two-part process I have described.⁵

10

11 **Q. HAS THE FCC REQUIRED BELL SOUTH TO PROCESS OS/DA**
12 **ROUTING ORDERS ELECTRONICALLY?**

13 **A.** No. Although the FCC has not required BellSouth to abandon manual
14 processing of customized routing orders, it noted that BellSouth would
15 have the burden of showing that it processed such orders in an
16 efficient and nondiscriminatory manner:

17 [W]e expect BellSouth to demonstrate that, if it
18 requires specific information for selective routing
19 that results in manual intervention in the
20 processing of such orders, BellSouth will be able
21 to process such orders in a timely manner and in

⁵ The Commission should note that BellSouth's position on this issue predates the FCC's LAll Order. Thus, despite the FCC's guidance, which was offered in response to these very policies, BellSouth continues to insist that ALECs follow an outmoded and duplicative set of practices designed to limit their OS/DA ordering options.

1 volumes reflecting reasonably foreseeable
2 demand. Of course, the easiest way for
3 BellSouth to make this demonstration is to ensure
4 that orders that include selective routing
5 information do not require manual intervention.

6 FCC Louisiana II Order ¶ 225. BellSouth did not attempt to make
7 such a showing in either the Georgia or North Carolina arbitration
8 proceedings.

9
10 **Q. IS ELECTRONIC ORDERING FOR CUSTOMER SPECIFIC LSRS**
11 **REQUESTING OS/DA ROUTING AVAILABLE FROM**
12 **BELLSOUTH'S OSS?**

13 **A.** No. By its own admission, BellSouth provides no processes for
14 electronic ordering of customer specific OS/DA today, and has made
15 no commitment as to when such processes might be available, if ever.

16
17 BellSouth's recent decision to stop development of this functionality is
18 particularly troubling. After over two years of having its requests for
19 electronic flow through OS/DA ordering ignored, AT&T placed a formal
20 change request with BellSouth for the capability in February 2000.
21 BellSouth accepted the request, committed resources to the project
22 and announced to the ALEC community that the capability for

1 electronic ordering of one custom routing option (to BellSouth's
2 platform unbranded) would be provided in Software Release 8 on
3 November 18, 2000. BellSouth repeatedly reaffirmed this schedule in
4 industry meetings up to and including a meeting on September 29,
5 2000.

6
7 On October 11, 2000, BellSouth made the unilateral decision to
8 remove this change from the Release. BellSouth informed the ALEC
9 community the next day during a Requirements Review Meeting. The
10 minutes from that meeting (Exhibit JMB-4) include the following:

11 BST CCP advised that the OS/DA change
12 request would be handled outside of Release 8.0.

13 A new database called Originating Line Number
14 Screening (OLNS) is being finalized that will
15 provide this service in a more efficient manner. A
16 meeting to discuss OLNS with interested CLECs
17 is being coordinated for Monday, October 16,
18 2000. CCP also advised that the Methods and
19 Procedures for OLNS are still under development.

20

21 There were two OLNS meetings held on October 16th, I have included
22 the minutes from both as Exhibit JMB-5. Neither meeting provided
23 significantly more detailed information. OLNS is useful only if an

1 ALEC elects to have one option for BellSouth provided OS/DA for all
2 of its customers in all nine BellSouth states. OLNS cannot be used to
3 route OS/DA calls to any platform except BellSouth's. (Exhibit JMB-1,
4 page 2, depicts an OLNS arrangement.) An ALEC subscribing to
5 OLNS may send all of its customers to either BellSouth ALEC branded
6 service, or BellSouth unbranded service but not some to ALEC
7 branded and others to unbranded. There are no available technical
8 specifications or methods and procedures and not committed
9 implementation data. And as Mr. Keith Milner (BellSouth) testified
10 here in the MCI Arbitration there is no electronic ordering capability
11 available. (Transcript Docket 00649-TP, Volume 9, October 6, 2000,
12 page 1330).

13

14 OLNS does not meet BellSouth's obligation to provide customized
15 OS/DA routing.

16

17 **Q. HAS THERE BEEN ANY CHANGE IN BELL SOUTH'S DECISION?**

18 A. No. During the recent Georgia Arbitration hearing, BellSouth's
19 witness Mr. Keith Milner claimed that this communication removing
20 electronic ordering of OS/DA from Release 8 was incorrect, and that
21 he personally had issued a memo directing that the decision be
22 reversed and that ALECs be so informed immediately. Exhibit JMB-6.

1 Despite Mr. Milner's claims, BellSouth has issued no retraction or
2 rescheduling regarding the inclusion of OS/DA ordering in Release 8.⁶
3
4 BellSouth filed a Late Filed Exhibit with the Georgia PSC on Monday,
5 November 13, 2000, which included the memo to which Mr. Milner
6 referred, as well as the earlier "mistaken" memo. The memo issued
7 as a "mistake" was sent to ALECs on October 11, announcing that the
8 ability to electronically order routing to OS/DA had been removed from
9 Release 8.0. The October 12 memorandum confirmed, rather than
10 contradicted, the first memo, saying, "We are only removing the
11 Change Request for mechanizing the ordering process from Release
12 8." Later, BellSouth reiterated its decision to remove OS/DA ordering
13 from Release 8 during the October 25, 2000, CCP Monthly Status
14 Meeting. I have provided BellSouth's Georgia Late Filed Exhibit and
15 the Minutes of the October 25th Monthly Status Meeting as Exhibit
16 JMB-7. BellSouth's announcement at the meeting and my objection to
17 it are noted on page 9 of the minutes, and the action item resulting
18 from my request to seek reinstatement of this feature is found on page
19 18.
20

⁶ In the Georgia arbitration hearing, Mr. Milner also claimed that BellSouth had provided AT&T with the information it had requested regarding detailed technical methods and procedures for ordering customized routing. This is also incorrect. As stated in my testimony above, AT&T has yet to receive footprint ordering instructions from AT&T.

1 Although BellSouth's Georgia Late-Filed Exhibit states that electronic
2 ordering now will be included in Release 8, that is not the case.
3 BellSouth approached AT&T on Friday November 10, 2000, with a
4 specification that, if implemented, might provide a highly restricted
5 capability for AT&T to submit some types of orders for OS/DA
6 electronically during the course of a "friendly test" of UNE-P. In a
7 teleconference held on Monday November 13, BellSouth confirmed
8 that the capability would be limited specifically to the friendly test
9 orders. No real AT&T customer orders can be placed, no other ALEC
10 will have any capability, only certain order types would be allowed,
11 and only routing to BellSouth's platform as unbranded would be
12 allowed. Thus, BellSouth plans to provide only a very limited trial
13 version of the production functionality that was cancelled.

14

15 **Q. WHAT DOES AT&T REQUEST THE COMMISSION TO ORDER**
16 **REGARDING THIS ISSUE?**

17 **A.** AT&T asks the Commission to order BellSouth to provide AT&T with
18 specific documented methods and procedures for each of the
19 customized routing methods it purports to offer: unbranded at
20 BellSouth's platform, AT&T branded at BellSouth's platform, and
21 routed to a non-BellSouth platform. The Commission also should
22 require BellSouth to provide AT&T with an ordering capability that will
23 allow AT&T to place individual customer orders electronically, with

1 flow through of such orders, and without the need to place line class
2 codes or other indicators on the orders when only one arrangement
3 exists in a given footprint area. AT&T is entitled to customized
4 routing, and the methods it has requested are reasonable, technically
5 feasible, and anticipated by the FCC.

6

7 **CUSTOMIZED ROUTING & OPERATOR SERVICES/DIRECTORY**

8 **ASSISTANCE – ISSUE 23**

9 **Q. DID THE FCC ADDRESS THE ISSUE OF CUSTOMIZED ROUTING**
10 **IN ITS ORIGINAL LOCAL COMPETITION ORDER?**

11 **A.** Yes. In its Local Competition Order, the FCC required that “[a]n
12 incumbent LEC must provide customized routing as part of the local
13 switching element, unless it can prove to the state commission that
14 customized routing in a particular switch is not technically feasible.”
15 (Local Competition Order at 15709.)

16

17 **Q. DID THE FCC ADDRESS THIS ISSUE IN ITS UNE REMAND**
18 **ORDER?**

19 **A.** Yes, in connection with its decision concerning Operator Services and
20 Directory Assistance (“OS/DA”), the FCC determined that incumbent
21 LECs remain obligated under the non-discrimination provisions of
22 47 U.S.C. § 251(c)(3) to comply with reasonable requests from ALECs
23 who purchase OS/DA to rebrand or unbrand those services, and to

1 provide directory assistance listing updates in daily electronic batch
2 files. However, the FCC determined that incumbent LECs are not
3 required to unbundle their OS/DA pursuant to 47 U.S.C. § 251(c)(3),
4 ***provided that*** the incumbent LEC provides customized routing to
5 ALECs to allow them to route traffic to ***alternate*** OS/DA providers.
6 Thus, the FCC now requires BellSouth to provide customized routing
7 as a pre-condition to allowing BellSouth not to offer OS/DA as a UNE.
8 From a practical standpoint, the customized routing architecture
9 proposed by BellSouth must be fully implementable and available in
10 every end office where technically feasible. It must be capable of
11 supporting the request of any ALEC and be implementable on a
12 central office basis in a very short period of time. It must be fully
13 tested and clearly demonstrate that the implementation results in
14 service equal to what BellSouth provides itself. It must be capable of
15 supporting both branded and unbranded messaging.

16

17 **Q. WHY ARE OS/DA AND CUSTOMIZED ROUTING CRITICAL TO**
18 **AT&T?**

19 **A.** Local operator and directory assistance services are integral
20 components of any significant local service offering. Any ALEC must
21 ensure that its customers can obtain the local OS/DA services that
22 they have come to expect from the incumbent. Similarly, ALECs must
23 have access at cost-based rates to the incumbent LECs' emergency

1 and directory assistance listings, including timely and efficient updates
2 of those listings, in order to provide the quality of service local
3 customers expect.

4

5 **Q. HAS BELL SOUTH PROVIDED A TIMELY CUSTOMIZED ROUTING**
6 **SOLUTION AS REQUIRED BY THE FCC, AND THE OTHER**
7 **STATES WHERE BELL SOUTH OPERATES SO AS TO AVOID ITS**
8 **OBLIGATION TO PROVIDE OS/DA AS UNES?**

9 **A.** No. BellSouth has proposed line class code solution and an intelligent
10 network ("AIN") solution for customized routing. The proposed AIN
11 solution has been promised by BellSouth for several years. To date,
12 BellSouth has not delivered on its promise. While AT&T did engage in
13 a limited AIN test in 1997 with BellSouth, BellSouth has provided no
14 information to indicate whether the proposed AIN solution it plans to
15 implement later this year is the same or is different than that which
16 was tested several years ago. (Exhibit JMB-1, page 3, depicts the
17 AIN arrangement.)

18 In January 1998, BellSouth and AT&T jointly performed a technical
19 test of an AIN solution during which both parties were present at a
20 BellSouth facility. That trial identified call setup problems that
21 increased post-dial delay to approximately one second for operator
22 service calls and two seconds for directory assistance calls. This
23 means that an ALEC customer whose calls are routed to that ALEC's

1 OS/DA platform will experience a post-dial delay that will not be
2 experienced by BellSouth customers. Some of this delay is
3 attributable to BellSouth's decision to direct all of the calls to
4 BellSouth's AIN tandem. The selective routing capability could be
5 provided by the end office AIN. In addition, because AT&T will pay
6 usage-based rates for originating calls through unbundling switching,
7 modest increases in seconds of originating usage could, over time and
8 thousands of calls, add up to significant costs that AT&T, but not
9 BellSouth, will incur. To date, no ALEC operating in BellSouth's states
10 has purchased AIN.

11

12 **Q. WHAT ARE SOME INEFFICIENCIES OF THE AIN SOLUTION?**

13 **A.** AIN was developed to enable enhanced line-based features such as
14 selective call forwarding and multi-distinct rings, etc. It was not
15 intended to support normal call routing and does not work well for high
16 volume-based calling. AIN bypasses the intelligence of the switch and
17 requires every single call to query the database for routing
18 instructions. In addition, if the database is down or is slow in
19 responding, the call will fail or be delayed. BellSouth has not clearly
20 demonstrated that its proposed AIN solution is equal to what it
21 provides itself.

22 **Q. WHAT OTHER SOLUTION HAS BELL SOUTH PROPOSED FOR**
23 **CUSTOMIZED ROUTING?**

1 **A.** BellSouth has also proposed the use of line class codes to route
2 OS/DA traffic to a third party platform.

3

4 **Q.** **HAS BELLSOUTH DEMONSTRATED THAT THIS PROPOSAL**
5 **MEETS THE NECESSARY REQUIREMENTS IN ORDER FOR**
6 **BELLSOUTH TO NO LONGER OFFER OS/DA AS AN**
7 **UNBUNDLED NETWORK ELEMENT?**

8 **A.** No. While line class codes have been used to perform customized
9 routing, BellSouth has not yet provided sufficient information such as
10 ordering instructions and supporting documentation to AT&T for each
11 of the customized routing options that BellSouth must provide. AT&T
12 and BellSouth performed limited testing of this solution in 1997.
13 However, several key issues still remain outstanding and were
14 discussed above in issue 25. Use of LCC technology to route OS/DA
15 calls to third party platforms is not currently available through a
16 commercially viable, timely and repeatable process.

17

18 **Q.** **DOES THE ORIGINATING LINE NUMBER SCREENING OPTION**
19 **PROVIDE A CAPABILITY TO ROUTE AN ALEC'S OS/DA CALLS**
20 **TO THE THIRD PARTY PLATFORM?**

21 **A.** No. As discussed above, OLNS can only be used to route calls to
22 BellSouth's OS/DA platform. The OLNS option does not provide a
23 basis for BellSouth to claim that it has met its customized routing

1 obligations and therefore charge market based rates for its OS/DA
2 service.

3

4 **Q. HAS BELL SOUTH PROVIDED REASONABLE SUPPORT TO AT&T**
5 **TO PROVIDE CUSTOMIZED ROUTING?**

6 **A.** No. BellSouth's policy and proposed contract language precludes
7 AT&T from obtaining customized routing that is efficient and
8 economical. BellSouth limits AT&T and other ALECs to selecting a
9 single "customized" routing for all of its customers across all nine
10 states. Even if an ALEC agrees to a single option, BellSouth has not
11 provided the information necessary to order that option across multiple
12 central offices, or to order that option for an individual customer. Such
13 a one size fits all approach precludes an ALEC from tailoring its
14 selection of customized routing to take advantage of different (more
15 efficient, less costly) trunking options that might be available to it in
16 different local exchange areas, LATAs and states.

17

18 While BellSouth indicates that it will allow an ALEC to have more than
19 one option, it apparently considers that to be something beyond its
20 obligations under the Act – which is clearly is not – and once again
21 has provided no instructions, methods, procedures or ordering
22 capabilities. AT&T must be able to route OS/DA calls to any specified,
23 existing trunking arrangements. BellSouth must be able to route

1 OS/DA calls using existing tandem architecture. BellSouth has not
2 demonstrated that they can provide these capabilities. AT&T, as well
3 as other ALECs, are entitled under the Act to flexible routing
4 arrangements that will meet their current and future needs.

5

6 **Q. WHAT ACTION DOES AT&T REQUEST THE COMMISSION TAKE**
7 **ON THIS ISSUE?**

8 **A.** BellSouth has not yet demonstrated that it has in place a customized
9 routing solution that complies with all the requirements of the FCC and
10 which allows AT&T to access OS/DA at parity with the access
11 BellSouth has to its own OS/DA. Until BellSouth does so, the
12 Commission should require BellSouth to continue to provide BellSouth
13 provided OS/DA as unbundled network elements at unbundled
14 network element prices.

15

16

ISSUE 30

17

THE CHANGE CONTROL PROCESS ISSUE

18

19 **Q. WHAT IS A CHANGE CONTROL PROCESS?**

20 **A.** A change control process (also known as a “change management
21 process”) is a process used to manage changes to a system, process,
22 or documentation so that they are made in an orderly and predictable
23 fashion. In the recent FCC BA-NY Order at ¶ 103 and in a September

1 27, 1999, letter to US West (Exhibit JMB-8) and hereinafter referred to
2 as the "US West Letter"), the FCC describes the phrase "change
3 management process" as referring to the methods and procedures
4 that the BOC employs to communicate with competing carriers
5 regarding the performance of and changes in the BOC's OSS system
6 that affect ALECs' production or test environments.

7

8 **Q. WHY IS THIS ISSUE IMPORTANT TO AT&T?**

9 **A.** Just as BellSouth requires time to make necessary modifications to its
10 systems and processes, AT&T and other ALECs need sufficient
11 advance notice of such modifications to allow them to make
12 responsive changes in their own systems and thereby continue to
13 provide service to their customers. All too often, ALECs receive little or
14 no notice of upcoming changes. In fact, AT&T has learned of some
15 system or process changes only when previously-acceptable orders
16 were rejected or improperly provisioned. Similarly, ALECs request
17 changes to BellSouth's systems and processes and need an orderly
18 and predictable method by which such change requests will be
19 handled. Thus, the quality of BellSouth's Change Control Process
20 directly affects AT&T's ability to offer competitive service to its
21 customers.

22

1 An extremely graphic illustration of problems resulting from
2 inadequate change control processes occurred early this year in New
3 York when Bell Atlantic – New York (“BA-NY”) implemented changes
4 to its ECXpert software, which lies at the heart of its OSS system for
5 provisioning UNE orders. These software changes were not properly
6 managed through a robust change control process. Shortly
7 thereafter, ALECs began reporting that BA-NY systems were losing
8 ALEC service orders in increasingly large numbers. Despite extensive
9 (and expensive) work-arounds, ALECs simply could not compensate
10 for this massive problem, and tens of thousands of customers’ orders
11 were lost or delayed, including 40,000 AT&T orders.

12
13 On February 24, 2000, BA-NY finally announced that it could not
14 correct the software problems in ECXpert, that the software was
15 “inherently unstable and unscalable”, and that the software would be
16 abandoned. BA-NY proposed to replace ECXpert with a new and also
17 untested system that was developed internally by Bell Atlantic to be
18 introduced only four days later, on February 28th. Bell Atlantic
19 explained that haste was required because continued use of ECXpert
20 made it impossible for Bell Atlantic to satisfy industry standards in
21 provisioning UNE orders. BA-NY further explained that it would be
22 replacing ECXpert first in connection with LSOG 2 and then with

1 LSOG 4, and that ECXpert would be abandoned throughout the entire
2 Bell Atlantic operating territory

3 These problems could have been prevented by a change control
4 process such as that being requested by AT&T. At the very least,
5 existence of an appropriate testing environment, go/no go decision
6 point involving ALECs, and a versioning process would have mitigated
7 this disaster.

8

9 **Q. PLEASE DESCRIBE TYPES OF CHANGES THAT SHOULD BE**
10 **MANAGED VIA A CHANGE CONTROL PROCESS.**

11 **A.** Every change to a BOC's OSS, supporting process, or documentation
12 that requires responsive changes in ALEC systems or processes
13 should be managed via an orderly and predictable change control
14 process. Such changes include:

- 15 1) operations changes to existing functionality that impact the
16 ALEC interface(s) when a BOC releases new interface
17 software;
- 18 2) technology changes that require ALECs to meet new technical
19 requirements when a BOC issues a software release;
- 20 3) additional functionality changes that may be used at the
21 ALEC's option, when a BOC releases a new interface software;
- 22 4) changes that may be mandated by regulatory bodies; and
- 23 5) changes to correct defects and emergency situations.

1 In all such cases, supporting processes and documentation must be
2 included and ALECs must have sufficient advance notice of BOC
3 system changes to allow them to make responsive changes to their
4 own systems.

5

6 **Q. HAS THE FCC GIVEN BOCS AND ALECS ANY GUIDANCE ON**
7 **THE MINIMUM ATTRIBUTES OF A SATISFACTORY CHANGE**
8 **CONTROL PROCESS?**

9 **A.** Yes. In both the FCC BA-NY Order and the US West Letter, the FCC
10 describes additional characteristics of a satisfactory change
11 management process, including:

- 12 • ALEC participation;
- 13 • Procedures documentation;
- 14 • Prioritization and stratification of changes;
- 15 • Schedules for notifications;
- 16 • A testing environment and minimum 30 day test window for
17 new releases;
- 18 • A go/no go decision process to preclude premature
19 implementation by the BOC;
- 20 • Versioning of releases (maintaining the old version of an
21 interface along with the new);
- 22 • Memorialization of the process, including a means by which the
23 process can be modified;

- 1 • Dispute resolution process for ALECs, specific to change
- 2 management disputes;
- 3 • Followed consistently over time; and
- 4 • Subject to regulatory oversight (which includes enforcement).

5

6 From the FCC's descriptions, it is clear that the entire range of

7 transactions required between AT&T and BellSouth in order for AT&T

8 to utilize BellSouth's network services and elements should be

9 managed via an orderly and predictable change control process. Both

10 electronic and manual interfaces and processes are required to

11 establish and maintain a business relationship with BellSouth and

12 conduct day-to-day business transactions and all such processes

13 should be managed by an orderly and predictable change control

14 process. Exhibit JMB-9 visually depicts a comprehensive change

15 control process.

16

17 A comprehensive change control process should provide "cradle to

18 grave" coverage of the life cycle of an interface or process, as well as

19 its supporting documentation (such as specifications, business rules,

20 methods, and procedures). Thus, the change control process should

21 control implementation of new interfaces, management of interfaces in

22 production (including defect correction), and the retirement of

23 interfaces. A robust change control process should provide a process

1 for making normal changes, an exception process, an escalation
2 process, and a dispute resolution process, with ultimate recourse to
3 the state commission, mediation, or court adjudication. Additionally, a
4 process should be specified which could change the Change Control
5 Process itself.

6
7 **Q. DOES BELL SOUTH HAVE A CHANGE CONTROL PROCESS?**

8 **A.** Yes, but the process is inadequate and BellSouth frequently fails to
9 follow it. The charter for the development of a change control
10 process grew out of ALEC complaints to the Georgia Public Service
11 Commission ("PSC") regarding inaccuracies and omissions in the
12 information available to them concerning interfaces that existed in late
13 1997. Thereafter, BellSouth and several ALECs, including AT&T,
14 signed the Electronic Interface Change Control Process ("EICCP")
15 document ("the change control document") in April 1998. The change
16 control document, which was produced only as a result of regulatory
17 "prodding" of BellSouth by the Georgia PSC, and useful at the time,
18 was extremely limited in scope and was insufficient to meet the
19 current and future needs of ALECs or the requirements of the FCC.
20 For example, it encompassed only BellSouth's existing interfaces and
21 did not apply to new interfaces until they were deployed. Thus,
22 BellSouth was free to introduce new interfaces without appropriate
23 notice to and input from the ALECs that would use those interfaces.

1 In February 2000, BellSouth began developing an Interim Change
2 Control Process ("I-CCP") in response to certain findings by KPMG in
3 the Georgia Third Party OSS Test. The I-CCP was an evolving work
4 in progress, and BellSouth replaced the EICCP procedures with I-CCP
5 procedures in near real-time and often without the full concurrence of
6 the ALECs participating in the process. While the I-CCP attempted to
7 address the shortcomings of the EICCP, its final form and BellSouth's
8 future adherence to its requirements are speculative.

9

10 The designation of the I-CCP document and process as "interim" was
11 removed following a controversial vote taken in August 2000, despite
12 the fact that a key section regarding defects and expedites was still
13 only in draft form and that there was no consensus agreement
14 regarding the contents of the remainder of the document.⁷ BellSouth
15 published Version 2.0 of the Change Control Process Document on
16 August 23, 2000, and it remains the current version today.

17

18 Through their participation in the process, AT&T and BellSouth have
19 reached agreement on many elements of change control. However,
20 the CCP in its current form is still deficient in many areas, as will be

⁷ BellSouth issued an agenda for a Change Control conference call that included a "discussion" of the Interim Change Control Process, among other things. After the discussion, however, and at the end of the lengthy conference call, BellSouth called for a vote on whether to accept the interim process as permanent. Because there had been no notice that a vote would be taken, several participants had dropped off the call by this point, and still others were without authority to vote on behalf of their company. Despite these irregularities, however, BellSouth has refused to allow a re-vote.

1 discussed below. Version 2.0 of the CCP, dated August 23, 2000,
2 and marked up on October 27, 2000, is attached as Exhibit JMB-10 to
3 show changes proposed by AT&T (and in which other ALECs have
4 concurred.) AT&T has submitted a formal Change Request to
5 BellSouth, requesting adoption of the changes shown in Exhibit JMB-
6 10.⁸

7
8 **Q. DOES BELLSOUTH'S VERSION 2.0 CHANGE CONTROL**
9 **PROCESS ("CCP") COMPLY WITH THE FCC'S GUIDANCE?**

- 10 **A.** No. The CCP fails to cover all areas that should be included in a
11 robust Change Control Process. Specifically, the I-CCP is deficient
12 when compared to the FCC's guidance in the following ways:
- 13 • It does not adequately cover the introduction of new interfaces;
14 (see discussion below in section a)
 - 15 • It does not adequately cover retirement of existing interfaces;
16 (see discussion below in section b)
 - 17 • It does not provide a process for exceptions to the Change
18 Control Process; (see discussion below in section c)

⁸ BellSouth elected not to schedule discussion of this request during regular monthly Change Review Status meetings, as called for in the existing process. Instead, BellSouth insisted that the ALECs conduct their own meeting to discuss AT&T's Change Request. All ALECs that participate in the Change Control Process were invited to the meeting, as were several BellSouth representatives. The meeting, which was held on October 27, 2000, was attended by representatives of the core group of participating ALECs, all of whom concurred in the changes shown in Exhibit JMB-10.

- 1 • It does not provide an adequate process for defect correction;
2 (see discussion below in section e and f)
- 3 • It does not provide an adequate process for managing changes
4 to documentation and training; (see discussion below in section
5 d)
- 6 • Its cycle times for all types of changes are too long; (see
7 discussion below in section g)
- 8 • It does not include a firm notification schedule for all changes
9 initiated by BellSouth; (see discussion below in section h)
- 10 • It does not include an adequate escalation process; (see
11 discussion below in section j)
- 12 • It does not include an adequate dispute resolution process;
13 (see discussion below in section i)
- 14 • It does not provide a means to implement changes in testing
15 procedures; (see discussion below in section k)
- 16 • It does not provide for a pre-release testing environment; (see
17 discussion below in section k)
- 18 • It permits BellSouth to unilaterally cancel, reject or reclassify
19 ALEC submitted change requests; (see discussion below in
20 section m)
- 21 • It permits BellSouth to unilaterally implement changes on a
22 schedule that is inconsistent with the prioritization of requests
23 by the ALECs; (see discussion below in section n)

- 1 • It does not include a defined process by which the process
2 itself can be changed through an orderly, informed vote by all
3 interested parties; (see discussion below in section o) and
4 • It is neither binding upon BellSouth nor subject to regulatory
5 oversight.

6

7 Additionally, BellSouth historically failed to follow even the limited
8 process prescribed in EICCP and this behavior has continued under
9 the I-CCP and CCP. BellSouth failed to adhere to the EICCP when
10 implementing the following types of changes to its systems, even
11 though EICPP provided a process for managing them:

- 12 • New and revised edits;
- 13 • Documentation and training changes;
- 14 • Regulatory required changes; and
- 15 • Changes BellSouth wished to initiate.

16 Each such change has the potential to disrupt ALEC processes and
17 systems and adversely affect provision of service to ALEC customers.

18

19 **Q. HOW ARE CHANGE REQUESTS PROCESSED UNDER THE**
20 **CHANGE CONTROL PROCESS?**

21 **A.** Under Version 2.0 of the CCP, a Change Review Committee
22 composed of BellSouth and ALECs meets three or four times
23 annually, based on a schedule prepared by BellSouth, to review and

1 prioritize change control requests. Monthly status meetings are held
2 between prioritization meetings. In order for Type 2-5 (non-
3 emergency) changes to be considered at any given prioritization
4 meeting, they must be submitted some 33 business days in advance
5 of the meeting. Changes that are accepted for implementation at the
6 Change Review meeting may appear in a "release package" (which
7 lists the requests that have been targeted for a scheduled release)
8 approximately 35 business days after the Change Review meeting,
9 and the implementation process can begin.

10

11 BellSouth's change control calendar establishes specific dates for all
12 aspects of the process, including cut-off dates for submission of
13 change requests before a particular Change Review meeting.
14 Requests made after the cut-off date generally will be reviewed only at
15 the next meeting. Under the current change control calendar, the
16 minimum time between the submission of a change control request
17 and the issuance of a "release package" is over three calendar
18 months, and could be more than six months. That period does not
19 include the date of actual implementation of the change. Not only is
20 this totally inadequate to meet ALEC needs, but it also offers
21 BellSouth a competitive advantage in that BellSouth can (and often
22 does) change its systems and processes at any time, without regard
23 to Change Review meetings, and to the detriment of ALECs.

1 **Q. COULDN'T THIS COMMISSION SIMPLY DEFER THIS ISSUE TO**
2 **THE ALECS AND BELL SOUTH TO RESOLVE?**

3 **A.** No. While BellSouth will argue that this is an industry issue, and that it
4 should be managed through the Change Control Process, the fact of
5 the matter BellSouth has total control over the process and may
6 simply ignore the business needs and wishes of the ALECs.
7 BellSouth has no legally binding commitment to follow the process or
8 to abide by any ALEC vote, and neither the Change Control Document
9 nor the process itself are subject to regulatory oversight.

10

11 The CCP process is often described as a "collaborative" process.
12 While it is true that AT&T and the ALECs continue to work with
13 BellSouth to improve the CCP, the process is not collaborative.
14 ALECs advise what they need, BellSouth either agrees, agrees but
15 later changes its mind, or says no. In essence, BellSouth retains veto
16 power. Following is an example that illustrates BellSouth's control
17 over the process.

18

19 During the June 28, 2000, Prioritization Meeting, ALECs prioritized 23
20 change requests for inclusion in future releases. Five were associated
21 with pre-ordering and 18 with ordering. The existing process calls for
22 a Release Package Meeting to be held 30 business days after the
23 Prioritization Meeting. The purpose of a Release Package Meeting is

1 to inform the ALECs how the prioritized changes have been scheduled
2 for implementation over the future releases and initiate the release
3 management project team. This meeting, which should have been
4 held on August 14, was not held until September 18 – delaying ALEC
5 change requests by an additional month.

6
7 Further, BellSouth did not comply with the CCP requirement that
8 “Sizing and sequencing of prioritized change requests will begin with
9 the top priority items and continue down through the list until the
10 capacity constraints have been reached.” Instead, BellSouth
11 unilaterally included only 6 items in its Proposed Release 8.0
12 Package, none of which dealt with pre-ordering, and four of which
13 were not highly prioritized items, including three of the lowest priority
14 items from the ordering list. Exhibit JMB-11. Many of the items
15 BellSouth elected not to address have been highly prioritized for
16 implementation by the ALECs in past cycles, going back as far as two
17 years.

18
19 In addition to its ability to control the process, BellSouth also routinely
20 elects not to comply with its requirements. BellSouth recently
21 released Issue 9G of BellSouth’s Business Rules for Local Ordering
22 (“BBR-LO”) which it admits includes significant changes that BellSouth
23 did not submit to the CCP. (Exhibit JMB-12) Because BellSouth

1 circumvented the CCP, ALECs had little advance notice of the
2 changes, and could not make the required coding and process
3 changes by the proposed October 2, 2000, implementation date,
4 which would result in BellSouth's systems rejecting their previously-
5 valid orders. BellSouth nevertheless refused to withdraw these
6 unapproved changes. Further, when BellSouth implemented the
7 associated software release on October 2, 2000, it was found to
8 contain programming defects (Exhibit JMB-13) that could have been
9 avoided had BellSouth made the release available to ALECs for
10 testing in advance of its implementation.
11
12 AT&T asks this Commission to specifically order BellSouth to adopt
13 the changes requested herein, and to specifically place the Change
14 Control Document under its supervision. It should be no more difficult
15 to avoid state-to-state conflicts regarding this process than any other
16 process incorporated into an Interconnection Agreement or into
17 BellSouth's Statement of Generally Available Terms and Conditions
18 ("SGAT").
19
20 **Q. YOU MENTIONED THAT YOU WOULD INTRODUCE A MARK-UP**
21 **OF VERSION 2.0 OF THE CHANGE CONTROL PROCESS**
22 **DOCUMENT. PLEASE TELL US WHY.**

1 **A.** Following the August 23, 2000, Monthly Status Meeting, BellSouth
2 produced Version 2.0 of the CCP document, incorporating all of its
3 desired changes, whether or not ALECs concurred. For example,
4 BellSouth incorporated into Version 2.0 a draft process to which no
5 ALEC has concurred, identified as an “expedited feature process”.
6 Version 2.0 is now the process document in use and is therefore the
7 appropriate document to discuss in this arbitration. If BellSouth
8 publishes an update to the CCP document before this Commission’s
9 decision, that new version should then supplant Version 2.0 as the
10 baseline for a decision.

11
12 The red line of Version 2.0 included with this testimony (Exhibit JMB-
13 10) is the same as that concurred in by the ALECs on October 27th
14 and November 1 and provided to BellSouth on November 5, 2000.

15
16 Substantive changes appear on 41 of 72 pages of the document, but
17 often the same change appears on multiple pages.⁹ It is this
18 document that the Commission should use as its baseline in reaching
19 its decision on this matter, as it shows the most current positions of
20 the parties. As noted above, if BellSouth publishes an update to the
21 CCP document, that new version should then supplant Version 2.0 as
22 the baseline for this Commission’s decision.

1 Exhibit JMB-14 provides a cross reference of revisions to sub-issues
2 and concerns.

3
4 In the following discussions, I will indicate the location and general
5 content of the revised language associated with each sub-issue under
6 discussion.

7

8 **a) *introduction of new interfaces;***

9

10 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO**
11 **INTRODUCTION OF NEW INTERFACES?**

12 **A.** Certain language proposed by BellSouth effectively would allow
13 BellSouth, rather than the ALEC community, to determine whether
14 changes to new interfaces should be managed under the CCP
15 document. All such changes should be managed under the process,
16 and failure to proceed under the CCP should be the exception. On
17 page 48 of Exhibit JMB-10, AT&T has proposed deleting this language
18 and adding language specifying that BellSouth will seek to follow the
19 processes designed for changes originated by BellSouth, but will
20 notify ALECs as promptly as possible if it is forced to deviate from that
21 process.

22

⁹ This page count, and the page numbering reference below are valid when the red-line document is printed on an HP Laser 4 printer. Use of another printer may result in a

1 ***b) retirement of existing interfaces;***

2

3 **Q. WHAT CHANGES DOES AT&T REQUEST REGARDING**
4 **RETIREMENT OF EXISTING INTERFACES?**

5 **A.** It appears that the parties have reached agreement on a portion this
6 issue. BellSouth's language regarding the retirement of interfaces
7 may be found on page 48 of Exhibit JMB 10. This language has been
8 enhanced by BellSouth and is now acceptable to AT&T.

9

10 During the October 27 and November 1, 2000 meetings, the ALECs
11 reached consensus on additional language related to the retirement of
12 versions of software as opposed to retirements of interfaces. This
13 proposed language also appears beginning on page 48.

14

15 ***c) exceptions to the process;***

16

17 **Q. WHAT CHANGES DOES AT&T REQUEST REGARDING**
18 **EXCEPTIONS TO THE CHANGE CONTROL PROCESS?**

19 **A.** AT&T requests a documented "exception" process for the handling of
20 Type 2 – 5 Changes under unusual situations. AT&T's request may
21 be found on pages 30-34 of Exhibit JMB-10 as Part 3 to Section 4 and
22 titled "Part 3 – Types 2-5 Exception/Expedited Feature Process."¹⁰

different numbering.

¹⁰ Additional related changes occur on pages 11 and 12.

1 In the interval between the publication of the Interim CCP Versions 1.4
2 through 1.6, BellSouth separately proposed a draft “Expedited
3 Feature” process. BellSouth’s proposal was included in Version 2.0 in
4 Section 5 and elsewhere despite objections from various ALECs.
5 (Exhibit JMB-15) Although BellSouth’s proposal is unacceptable as
6 written, it appears to be a foundation upon which the “exceptions”
7 process the ALECs have been requesting can be built. AT&T has
8 proposed modifications that would make the process acceptable.
9
10 Adoption of AT&T’s proposed changes will provide the ALECs and
11 BellSouth with an acceptable documented “exception” and “expedited”
12 process for the handling of Type 2 – 5 Changes.
13

14 ***d) documentation, including training;***
15

16 **Q. WHERE MAY AT&T’S DESIRED CHANGES RELATED TO**
17 **THIS ISSUE BE FOUND AND WHAT DO THEY REQUEST?**

18 **A.** The phrase “training materials and job aids” has been added on
19 page 7 of Exhibit JMB-10 to clearly indicate that changes which
20 will result in revisions to the training materials and job aids
21 BellSouth produces for ALECs are included within the scope of
22 the process.
23

1 **e) *defect correction;***

2 **f) *emergency changes;***

3

4 **Q. WHAT CHANGES DOES AT&T REQUEST REGARDING DEFECT**
5 **CORRECTION AND EMERGENCY CHANGES?**

6 **A.** In this testimony I have grouped these two sub-items together
7 because emergency changes are a sub-set of defect correction.
8 AT&T proposes language changes at various locations to reflect
9 AT&T's and other ALECs' needs for a process that corrects defects in
10 a timely manner. BellSouth's existing and proposed process (found
11 largely in Section 5 of Version 2) remains focused on notification and
12 contains excessively long intervals for correction. The "Draft
13 Expedited Feature Process" proposed by BellSouth is applicable
14 neither to defect correction nor emergency changes. AT&T's proposed
15 language may be found on pages 34-43 of Exhibit JMB-10.

16

17 A significant change in the definition of a defect appears on page 34.
18 This change resulted from ALEC input during the October 27th and
19 November 1st meetings. A third bullet point was added to address the
20 situation where the interface was working in accord with both of the

1 conditions in the first two bullets but still produced ineffective
2 transactions.¹¹

3
4 Adoption of AT&T's proposed changes will provide ALECs and
5 BellSouth with a documented defect correction and emergency
6 change process that meets their stated needs and is near parity with
7 the processes BellSouth uses in its own retail and wholesale
8 operations. Collectively the changes AT&T proposes here and in sub-
9 issue (c) above combine to provided ALECs with capabilities they
10 have been formally requesting from BellSouth since July of 1999.

11

12 ***g) an eight step cycle, repeated monthly;***

13

14 **Q. WHAT CHANGES DOES AT&T REQUEST REGARDING THE**
15 **CHANGE CONTROL CYCLE?**

16 **A.** AT&T will concur with the number and sequence of steps contained in
17 BellSouth's proposed Version 2 for Type 2 – 5 Change Requests, but
18 continues its request for reduced cycle times in order to met its
19 business needs. BellSouth's associated proposed language and
20 AT&T's proposed modifications may be found on the following pages
21 in Exhibit JMB-10:

22

¹¹ The new language treats as a defect the situation "where technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data." The definitions

1		<u>Page</u>	<u>Nature of AT&T Proposed Change</u>
2		21 and 23	reduction in Step 3 interval from 20 to 10
3			business days
4		21 and 26	reduction in Step 7 interval from 30 to 25
5			business days
6			
7		<i>h)</i>	<i>a firm schedule for notifications associated with changes</i>
8			<i>initiated by BellSouth;</i>
9			
10	Q.	WHAT CHANGES DOES AT&T REQUEST RELATING TO	
11		NOTIFICATIONS?	
12	A.	When BellSouth initiates Type 4 changes ¹² , it should prepare and	
13		distribute requirements and specifications according to the schedules	
14		shown on page 22 of Exhibit JMB-10 and in the associated Table 4-3.	
15		The requested interval of 90 days advance notice for distribution of	
16		draft requirements and specifications is particularly critical as, ALECs	
17		otherwise may not have sufficient time in which to complete required	
18		system and process modifications on their side of the affected	
19		interface.	
20			
21		In its recent approval of the SBC 271 application for Texas, the FCC	
22		found the inclusion of a schedule for the distribution of draft	

of defect on pages 12 and 63 also change to include this language.

¹² A type 4 change is a request initiated by BellSouth.

1 specifications or business rules to be significant.¹³ In its Order
2 approving Southwestern Bell's 271 application, the FCC discussed
3 with approval particular provisions of Southwestern Bell's change
4 control process. The FCC specifically noted that "the change
5 agreement includes a schedule for the distribution of draft
6 specifications, or business rules, receipt of competing carrier
7 comments on the documentation, and distribution of final
8 documentation that is based on the consensus of the parties." FCC
9 Southwestern Bell Order at paragraph 111. In contrast, BellSouth has
10 refused to provide ALECs with draft specifications. (Exhibit JMB-16)

11

12 In addition, on page 28 of Exhibit JMB-10, AT&T is requesting firm
13 implementation intervals for both software-related and documentation-
14 related issues under the normal Type 2-5 change process. The Type
15 2-5 Exception/Expedite process, which is described in Section 4, Part
16 3 (pages 30-35), is available for those instances in which the
17 requested normal interval might not be appropriate.

18

19 ***i) a process for dispute resolution including referral to state***
20 ***utility commissions or courts;***

21

¹³ FCC 00-238, Order Approving SBC Communications Inc. Section 271 Application ("FCC SBC Order"), para. 111.

1 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO DISPUTE**
2 **RESOLUTION?**

3 **A.** The dispute resolution provisions found on page 55 of Exhibit JMB-10
4 become effective if an issue is not resolved through the Escalation
5 Process specified in the document, so the two processes must be
6 considered together. The use of the escalation process ensures that
7 neither party will bring forward an issue for mediation or as a formal
8 complaint unless it has been appropriately and jointly investigated.

9

10 *j) a process for escalation of changes in progress.*

11

12 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO**
13 **ESCALATION OF CHANGES IN PROGRESS?**

14 **A.** AT&T has added specific intervals on pages 50 and 53 of Exhibit
15 JMB-10 for various steps in the escalation process, so issues with
16 more severe ALEC impact receive faster attention, while issues with
17 less severe impact have a longer resolution interval.

18

19 *k) Testing Support and Testing*

20

21 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO TESTING**
22 **SUPPORT AND A TESTING ENVIRONMENT?**

1 **A.** During the recent arbitration hearing between AT&T and BellSouth in
2 North Carolina, the parties reached an agreement regarding certain
3 changes to these sections. Unfortunately, the language in BellSouth's
4 proposed Version 2.0 does not comport with that discussion. The
5 mark-ups proposed by AT&T correctly memorialize that discussion
6 and are shown on pages 8 and 57 of Exhibit JMB-10.

7

8 ***l) Provision of a Trouble Number for Type 1 Events***

9

10 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO TYPE 1**
11 **EVENTS?**

12 **A.** BellSouth has agreed to provide the process requested by AT&T, but
13 that agreement is not reflected in Version 2.0. I have added
14 supporting language for this agreement at page 18 of Exhibit JMB-10.

15

16 ***n) The Ability of BellSouth to Unilaterally Cancel or Reject an***
17 ***ALEC Request***

18

19 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO THE**
20 **CANCELLATION, REJECTION OR RECLASSIFICATION OF A**
21 **CHANGE REQUEST?**

22 **A.** As presently written, the change control document effectively gives
23 BellSouth up-front veto power over any change request submitted by

1 ALECs. This is unreasonable; changes submitted by ALECs should
2 not be subject to arbitrary cancellation or rejection by BellSouth.
3 Instead, all Type 5 ALEC-submitted changes should progress to the
4 Monthly Status Meeting Stage. BellSouth should provide the
5 appropriate Subject Matter Expert and present its case for
6 cancellation/rejection to the industry at that time. Following input from
7 the industry, BellSouth and the originating ALEC will determine the
8 disposition of the change request in question. Without this process,
9 BellSouth retains up-front veto power over all ALEC change requests,
10 thus limiting the scope and effectiveness of the process. I have added
11 supporting language for this requirement at pages 23 and 24 of Exhibit
12 JMB-10.

13

14 ***n) Change Review – Prioritization – Release Package***
15 ***Development and Approval***

16

17 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO CHANGE**
18 **REVIEW MEETINGS, PRIORITIZATION AND RELEASE PACKAGE**
19 **DEVELOPMENT AND APPROVAL?**

20 **A.** AT&T's proposed language is shown on pages 25-27 and pages 44-
21 47 of Exhibit JMB-10. Type 2-5 changes must drive the need for and
22 content of future software releases in order to provide certainty to the
23 process. The present process, however, is driven by an arbitrary

1 release schedule developed without input from the affected ALECs or
2 the CCP. AT&T's suggested language establishes fixed points for
3 prioritization meetings, and requires all prioritized change requests to
4 be assigned to specific future releases. The process requested by
5 AT&T remains flexible, however, since change requests may be
6 reassigned to a different software release by group consensus during
7 any Release Package Meeting.

8

9 ***o) The Process of Changing the Process.***

10

11 **Q. WHAT CHANGES DOES AT&T REQUEST RELATING TO THE**
12 **PROCESS OF CHANGING THE PROCESS?**

13 **A.** The current document actually provides no procedure at all for
14 amending or changing the change control process, and therefore
15 repeated situations such as occurred on August 23, 2000 discussed
16 above are likely to occur. At page 56 of Exhibit JMB-10, I have
17 provided language that provides for an orderly, informed vote on
18 requested changes. The proposed process requires a supermajority
19 (2/3) vote in favor of any change protecting BellSouth from whimsical
20 ALEC behavior.

21

22 **Q. PLEASE SUMMARIZE AT&T'S REQUEST FOR SPECIFIC**
23 **CHANGES TO BELL SOUTH'S CHANGE CONTROL PROCESS.**

- 1 **A.** AT&T asks this Commission to order BellSouth to incorporate the
2 following attributes in its Change Control Process.
- 3 1. It should cover the following processes:
- 4 • changes to manual as well as electronic processes,
5 whether sought by BellSouth or by ALECs;
6 • introduction of new interfaces;
7 • billing; and
8 • retirement of existing interfaces.
- 9 2. It should provide processes for the following issues:
- 10 • defect correction;
11 • exceptions to the Change Control Process;
12 • escalation of change requests;
13 • interpretation and clarification of operational
14 documentation; and
15 • dispute resolution.
- 16 3. It should provide for a permanent test environment and the
17 ability to change the testing process.
- 18 4. It should require cycle times that produce monthly prioritization
19 meetings between BellSouth and ALECs and a maximum time
20 of 60 calendar days from submission of a Type 2-5 change
21 through its inclusion in a release package, with a process for
22 more frequent meetings as necessary.

- 1 5. It should include a firm notification schedule for changes
2 initiated by BellSouth.
- 3 6. It should be legally binding upon BellSouth and subject to
4 regulatory oversight to ensure that BellSouth can not ignore
5 change control processes with impunity.

6

7 **Q. WHAT DOES AT&T REQUEST THAT THE COMMISSION DO**
8 **REGARDING THIS ISSUE?**

9 **A. AT&T requests that the Commission correct these deficiencies by**
10 adopting the revisions to the CCP attached as Exhibit JMB-10 to my
11 testimony.

12

13

ISSUE 31

14

THE EQUIVALENT FUNCTIONALITY ISSUE

15

16 **Q. PLEASE EXPLAIN AT&T'S REQUEST FOR EQUIVALENT OSS**
17 **FUNCTIONALITY.**

18 **A. In Issue 31, AT&T requests a number of OSS improvements that have**
19 been at issue between the companies for some time. Although
20 repeatedly requested by AT&T, BellSouth has yet to provide AT&T
21 with OSS functionality it provides to itself to support the quality of
22 service enjoyed by BellSouth's retail customers. BellSouth enjoys the
23 benefits of a suite of interconnected databases and computer

1 processing systems of its own choosing and designed as best
2 possible to enhance the efficiency and effectiveness of its operations.
3 Even when manual processes are required, BellSouth is able to
4 design such processes to take maximum advantage of the available
5 computing, database, and communications power it possesses.
6
7 AT&T, on the other hand, when attempting to access BellSouth's
8 databases, computer processing, communications resources, and
9 manual processes, is restricted by BellSouth's unwillingness to
10 provide parity to its competitors. Throughout the life of the existing
11 AT&T–BellSouth Interconnection Agreement, AT&T has repeatedly
12 sought to obtain access that would allow it to have functionality equal
13 to that enjoyed by BellSouth. Section 251 of the 1996 Act clearly
14 envisioned that ILECs like BellSouth might be inclined to be less than
15 fully cooperative in many cases, and therefore authorizes state
16 commissions to address this situation through arbitration. In this
17 Arbitration, AT&T asks the Commission to mandate implementation of
18 equivalent functionality for the following three conditions:

- 19 • Parsed customer service records;
- 20 • The ability to submit orders electronically for all services
21 and elements; and
- 22 • Electronic processing after electronic ordering, without
23 subsequent manual processing by BellSouth personnel.

1 Exhibit JMB-17 depicts the interrelationship of these conditions and
2 AT&T's desired resolutions.

3

4 **Q. PLEASE EXPLAIN WHY AT&T REQUIRES BELLSOUTH TO**
5 **PROVIDE PARSED CUSTOMER SERVICE RECORDS.**

6 **A.** AT&T needs this functionality in order to fully integrate its ordering
7 systems with BellSouth's, thereby obtaining the functionality now
8 available to BellSouth. BellSouth's internal systems parse the
9 sections and fields of the CSR as needed to meet software program
10 requirements, thus precluding the need for service representatives to
11 re-enter CSR information when processing orders. Additionally,
12 BellSouth should provide parsed customer service records for
13 preordering pursuant to industry standards. Parsing rules for CSRs
14 have been included in industry standards since the publication of the
15 LSOG3/TCIF9 guidelines July, 1998.

16

17 **Q. PLEASE EXPLAIN WHAT YOU MEAN WHEN YOU SAY THAT**
18 **AT&T WANTS BELLSOUTH TO PROVIDE PARSED CUSTOMER**
19 **SERVICE RECORDS.**

20 **A.** We are asking BellSouth to provide us with electronic customer
21 service record data that is divided up into fields that BellSouth's
22 systems can recognize when we return it to BellSouth. For example,
23 BellSouth provides us with the customer's listed name as one field, or

1 block, of data. But when we order listing service for that customer,
2 BellSouth requires us to enter the customer's name in at least two
3 fields instead of one. So we have to separate the information
4 manually, which takes time and costs extra money. BellSouth's
5 service representatives don't have to do this, so AT&T is requesting
6 (and entitled to) the same functionality.

7

8 **Q. PLEASE EXPLAIN WHY AT&T REQUIRES THE ABILITY TO**
9 **SUBMIT ORDERS ELECTRONICALLY.**

10 **A.** BellSouth can place an electronic order for every service and product
11 that it provides to its own customers. AT&T requires this same ability
12 in order to compete against BellSouth. Lack of electronic ordering
13 increases the possibility of errors, extends intervals, increases costs,
14 and reduces ALECs' ability to compete due to the required (but
15 unnecessary) manual intervention by both ALEC and BellSouth
16 personnel.

17

18 Although I have listed electronic ordering as a desired functionality,
19 the ability to submit orders electronically for all services and elements
20 and the ability to have all electronically submitted orders processed
21 without subsequent manual intervention, which is discussed below,
22 are sequentially and dependently related - it is impossible to have the
23 second ability until the first has been provided. Ideally, both should be

1 provided simultaneously because BellSouth possesses both
2 capabilities for every service and product that it provides to its own
3 customers.

4

5 BellSouth has argued that it already offers equivalent functionality to
6 AT&T because BellSouth uses some manual steps in its own internal
7 processes. But the manual processes BellSouth describes involve
8 pre-ordering, not ordering. Further, BellSouth has admitted that its
9 service representatives can order every retail service electronically.
10 AT&T seeks that same ability. Despite BellSouth's own capabilities,
11 however, it has continually refused to provide fully electronic ordering
12 capability to ALECs, let alone fully automated processing of
13 electronically submitted orders, despite the fact that it provides these
14 capabilities to itself.

15

16 **Q. PLEASE EXPLAIN WHY AT&T REQUIRES ELECTRONIC**
17 **PROCESSING AFTER ELECTRONIC ORDERING, WITHOUT**
18 **SUBSEQUENT MANUAL HANDLING BY BELL SOUTH**
19 **PERSONNEL.**

20 **A.** The short answer is because this is how BellSouth's own orders are
21 processed and that without parity AT&T and the other ALECs cannot
22 be competitive in the market place. Because electronic ordering and
23 processing is less expensive, faster, and less prone to errors than

1 manual ordering and processing, BellSouth's electronic ordering and
2 processing capability puts ALECs at a competitive disadvantage.

3

4 **Q. HOW DOES BELL SOUTH PROCESS ITS OWN SERVICE**
5 **REQUESTS?**

6 **A.** Exhibit JMB-18 depicts the methods by which BellSouth submits its
7 customers' requests to its legacy computer systems. In Florida,
8 BellSouth uses the Regional Negotiation System ("RNS") as the
9 primary front-end system to input residential service requests and
10 uses the Regional Ordering System ("ROS") as the front-end system
11 for all business service requests¹⁴. The legacy system to which both
12 RNS and ROS send their requests is the Service Order Control
13 System ("SOCS"). SOCS assigns service order numbers to each
14 request and processes all requests received through an edit program
15 known as the Service Order Edit Routine ("SOER"). If, and only if, the
16 service request passes the SOER edits does it actually become a
17 service order, which SOCS then can provide to BellSouth's
18 downstream provisioning legacy systems. A service request that has
19 become a service order is said to be an "Assignable Order" and is
20 referred to as having reached "AO" status. A service request that

¹⁴ The system that ROS replaced during 1999, the Direct Order Entry ("DOE") system, has been retained by BellSouth for two purposes since it can be used to input any type of service request (business, residential, or UNE). These two uses are as a secondary input system in BellSouth retail residence operations, and as the interface used in the Local Carrier Service Center ("LCSC") to input ALEC manual and electronically submitted "designed fallout" local service requests.

1 does not pass the SOER edits is rejected and returned to the
2 originating BellSouth input center for correction.

3

4 In order to minimize the number of RNS and ROS service requests
5 that are rejected by the SOER edits in SOCS, BellSouth has provided
6 editing and formatting software in RNS and ROS. This software
7 prevents BellSouth employees from sending service requests that
8 have certain errors. In the RNS system, these software programs are
9 known as the FID and USOC Edit Library¹⁵ ("FUEL") and the Service
10 Order Layout and Assembly Routine ("SOLAR"). In the newer ROS
11 UNIX application this edit software is not separately identified.

12

13 Once a BellSouth representative has gathered and arranged all of the
14 information necessary to place a service request on behalf of a
15 BellSouth retail customer, a process known as pre-ordering, the
16 employee types the order into RNS or ROS. If the pre-ordering
17 information is accurate and the employee has made no input errors,
18 the service request will pass the RNS or ROS edits, be forwarded to
19 SOCS, pass the SOER edits, obtain AO status and be distributed as
20 necessary to BellSouth's downstream legacy systems.

21 Thus, barring error, all BellSouth services and products can be
22 requested and ordered as the result of the typed input of a single

¹⁵ FID stands for Feature Identification, USOC for Uniform Service Order Code.

1 employee. AT&T seeks this same capability, which I shall refer to as
2 "Flow-through Ordering".

3

4 **Q. DOES BELL SOUTH PROVIDE FLOW-THROUGH ORDERING FOR**
5 **ALL SERVICES AND ELEMENTS TO AT&T AND THE OTHER**
6 **ALECS, AS IT DOES FOR ITSELF?**

7 **A.** No. BellSouth has provided Flow-Through Ordering for some services
8 and elements, but many other services and elements must be
9 manually ordered, manually processed, or both.

10

11 **Q. PLEASE EXPLAIN HOW BELL SOUTH RECEIVES AND**
12 **PROCESSES ALEC SERVICE REQUESTS.**

13 **A.** Exhibit JMB-19 depicts the methods by which BellSouth processes
14 service requests submitted by ALECs into service orders. ALECs
15 each have their own front end systems to prepare their service
16 requests, which then are sent to BellSouth using one of three
17 electronic interfaces: the Electronic Data Interchange ("EDI"), the
18 Telecommunications Application Gateway ("TAG") or the Local
19 Exchange Navigation System ("LENS"). Both EDI and TAG are based
20 on industry standards, while LENS is proprietary to BellSouth.
21 Because the requests are sent to BellSouth in a Local Service
22 Request ("LSR") format, which is different from the formats generated
23 by RNS and ROS, BellSouth uses a suite of hardware and software

1 systems and programs to convert the ALEC LSRs into formats that
2 SOCS can recognize. The SOCS system that processes the ALEC
3 service requests is exactly the same SOCS that processes a
4 BellSouth service request, and it applies the very same SOER edit to
5 ALEC service requests before either rejecting the request or allowing
6 it to reach Assignable Order status.

7

8 The suite of hardware and software systems and programs that
9 BellSouth has built between the ALECs and SOCS was designed by
10 BellSouth from end-to-end and is not controlled by any industry
11 standards, which relate only to communications between the EDI and
12 TAG portions of the interface. Once an ALEC service request has
13 been received and accepted by the EDI or TAG gateway, BellSouth
14 first sends it to a Router that simply determines whether or not the
15 service request includes Local Number Portability ("LNP"). Service
16 requests including LNP are then routed to the LNP Gateway, while all
17 others are routed sequentially to the Local Exchange Ordering ("LEO")
18 and Local Exchange Service Order Generator ("LESOG") systems for
19 editing and formatting. The LNP Gateway performs the same edits
20 and formatting as LEO/LESOG for service requests that include LNP,
21 and it also communicates the unique LNP elements of the request to
22 the national LNP Service Management System ("SMS") which is
23 external to BellSouth.

1 Once service requests are formatted by LEO/LESOG or the LNP
2 Gateway they are forwarded to SOCS, but BellSouth has not
3 programmed LEO/LESOG and the LNP Gateway to format all
4 electronically submitted ALEC service requests into SOCS-readable
5 requests. Instead, BellSouth designed these components to cause
6 many orders to “fall out” of the electronic system, requiring manual
7 processing. Additionally, LEO/LESOG, the LNP Gateway, and SOCS
8 do not always perform as they should: they route a number of
9 perfectly valid ALEC service requests to manual processing when they
10 should not.

11

12 Thus, electronically submitted electronic service requests may receive
13 manual processing 1) because BellSouth has not designed its system
14 to process the request, which is known as designed Manual Fall Out
15 or 2) because BellSouth’s systems fail to perform as designed, which
16 is known as BellSouth-Caused System Failure. Manual processing is
17 undesirable because, as the FCC has repeatedly recognized, manual
18 processing limits reliability by increasing errors, increasing installation
19 intervals, and increasing costs.

20

21 **Q. IS IT POSSIBLE TO QUANTIFY THE IMPACT OF DESIGNED**
22 **MANUAL FALL OUT AND BELL SOUTH-CAUSED SYSTEM**
23 **FAILURES ON ALEC LOCAL SERVICE REQUESTS?**

1 **A.** Yes, in January 2000, BellSouth began providing additional data
2 concerning the level of Manual Fall Out and BellSouth-Caused
3 System Failure experienced by ALEC service requests. This data is
4 now available for each of the three interfaces (LENS, TAG and EDI)
5 and by four groupings of products and services (Local Number
6 Portability ('LNP"), UNEs, Business Resale, and Residence Resale).
7 In Exhibit JMB-20, I have extracted from BellSouth's May 2000
8 through September 2000 Flow-Through Reports five key data points
9 for each interface and product combination and calculated five
10 measures of Manual Fall Out, System Failure, and Flow-Through
11 Ordering.
12
13 As I explain below, BellSouth's data clearly shows that electronically
14 submitted ALEC LSRs, particularly those for LNP, UNE or business
15 products have low maximum flow-through rates, that the maximum
16 flow-through rates for the products AT&T is ordering are even lower,
17 and that both of these results are due to BellSouth's design decisions,
18 and the failure of BellSouth's interfaces to perform as designed.
19
20 The data points and their definitions shown in Exhibit JMB-20 are as
21 follows:
22 • Total Mechanized LSRs – the number of ALEC Local Service
23 Requests submitted electronically.

- 1 • Manual Fall Out – the number of ALEC Local Service Requests
2 submitted electronically that by BellSouth’s design are routed for
3 manual processing.
4
- 5 • Validated LSRs – the number of ALEC Local Service Requests
6 submitted electronically which do not contain an ALEC auto
7 clarification error¹⁶ and for which BellSouth has designed
8 automated processing.
9
- 10 • BellSouth-Caused System Failures – the number of ALEC Local
11 Service Requests that were submitted electronically and became
12 validated LSRs, but which BellSouth’s systems failed to process,
13 and were instead routed to manual handling.
14
- 15 • Flow-Through Issued Service Orders – the number of ALEC Local
16 Service Requests submitted electronically that are forwarded to
17 SOCS without BellSouth human intervention.
18
- 19 The measurements and their definitions are as follows:
- 20 • % Manual Fall Out – LSRs –The percentage of ALEC LSRs
21 subjected to manual processing by BellSouth’s design decisions,
22 calculated by dividing Manual Fall Out by Total Mechanized LSRs.

¹⁶ An auto clarification error is an input error made by an ALEC that BellSouth’s systems have been programmed to find and return automatically without human intervention.

- 1 • % BellSouth System Failure – LSRs –The percentage of ALEC
2 LSRs subjected to manual processing because BellSouth’s
3 systems fail to perform as designed, calculated by dividing
4 BellSouth-Caused System Failures by LSRs.
5
- 6 • % Total BellSouth Fall Out + Failure – LSRs – The total
7 percentage of ALEC LSRs subjected to manual processing by
8 BellSouth causes, calculated as the sum of the two previous
9 measures.
10
- 11 • % Maximum Flow Through ALEC Orders – 100% - the % Total
12 BellSouth Fall Out + Failure – LSRs. The maximum possible
13 percentage of electronically submitted ALEC LSRs that would be
14 Flow Through processed if ALECs make absolutely no input errors.
15
- 16 • % BellSouth System Failure – VLSR – The percentage of validated
17 LSRs, which BellSouth’s systems have been designed to process,
18 that encounter unexpected failures, calculated by dividing
19 BellSouth-Caused System Failures by Validated LSRs.
20
- 21 As discussed above, barring input error by its employees, BellSouth
22 has Flow Through Ordering capability for 100% of the products and
23 services it provides to its retail customers. The interfaces BellSouth

1 provides to ALECs simply do not provide ALECs with the same
 2 capability. With the exception of residential resale service, only one-
 3 third to two-thirds of ALECs' error-free LSRs can be processed on a
 4 Flow Through basis.

5
 6 I reviewed BellSouth's data For September 2000, and determined that
 7 ALECs' maximum possible Flow Through opportunity – even if they
 8 had submitted every service request with absolutely no input errors –
 9 was as low as 6%. For example, if ALECs had submitted 100 valid,
 10 error free orders for Local Number Portability (“LNP”) over the TAG
 11 gateway in September of this year, only 6 of them would have flowed
 12 through to SOC's.

13

% Maximum Flow Through ALEC Orders September 2000				
Interface/ Product	LNP	UNE	Business Resale	Residence Resale
TAG	6%	65%	45%	94%
EDI	35%	18%	30%	65%
LENS	NA	55%	52%	85%

14

1 Only in the Residence Resale product grouping does any interface
2 provide any acceptable level of Flow Through Ordering capability to
3 ALECs. This is because the total percentage of ALEC LSRs
4 subjected to manual processing by BellSouth causes (% Total
5 BellSouth Fall Out + Failure – LSRs, shown in the table below), is
6 unacceptably high for all interface/product combinations except
7 TAG/Residence Resale:
8

<u>% Total BellSouth Fall Out + Failure – LSRs September 2000</u>				
Interface/ Product	LNP	UNE	Business Resale	Residence Resale
TAG	94%	35%	55%	6%
EDI	65%	82%	70%	35%
LENS	NA	45%	48%	15%

9
10 Each electronically submitted LSR represented by the percentages in
11 these tables was touched by both the ALEC that originated the
12 request and by BellSouth. BellSouth, and BellSouth alone, controls
13 the two components (manual fallout and system failure) that generate
14 the low maximum flow-through percentages shown in the table above.

1 The table below shows the incidence of manual fallout and system
2 failure for various product lines across interfaces for September of this
3 year. Curiously, the rate of system failure varies across interfaces:

<u>Variance Manual Fall Out / System Failure – September 2000</u>				
Interface/ Product	LNP	UNE	Business Resale	Residence Resale
TAG	58% manual fallout/36% system failure	21% / 14%	42% / 13%	3% / 3%
EDI	26% / 39%	77% / 5%	60% / 10%	5% / 30%
LENS	NA	23% / 22%	24% / 24%	8% / 7%

4

5 The variance in system failure rates between the interfaces when
6 processing service requests for the same product grouping is difficult
7 to understand. As shown in Exhibit JMB-19, the LEO/LESOG, LNP
8 Gateway and SOCS systems in which these failures actually occur are
9 common to all three TAG, EDI, and LENS interfaces, so one would
10 expect the system failure rates to be the same or at least similar.
11 These system failure rates become even more significant when one

1 considers that the failures occur on service requests that the systems
 2 were specifically designed to process. The table below (% BellSouth
 3 System Failure – VLSR) captures this situation. It shows the
 4 percentage of validated LSRs, which BellSouth’s systems were
 5 designed to process, but which nevertheless encounter unexpected
 6 failures. In September the various interfaces performed as follows:
 7

The % BellSouth System Failure – VLSR – September 2000				
Interface/ Product	LNP	UNE	Business Resale	Residence Resale
TAG	92%	22%	30%	4%
EDI	56%	59%	30%	38%
LENS	NA	33%	38%	9%

8
 9 The table reveals that the EDI interface failed to process 30% to 59%
 10 of the validated local service requests it was designed to process.
 11 The TAG interface failed to process 4% to 92% of the validated local
 12 service requests it was designed to process. The LENS interface
 13 failed to perform as designed 9% to 38% of the time.
 14

1 **Q.** **YOU HAVE DISCUSSED DATA FOR SEPTEMBER 2000. IS**
2 **THERE ANY EVIDENCE OF IMPROVEMENT IN THESE RESULTS**
3 **OVER TIME?**

4 **A.** No. In Exhibit JMB-21, I show the maximum possible flow through
5 results from May through September for each of the four product
6 groups (LNP, UNE, Business, Residence) and ordering interface (EDI,
7 TAG, LENS). There is no significant or consistent improvement trend.
8 In fact, September's results for two combinations (TAG used for LNP
9 and EDI used for UNE) are at all time lows.

10

11 **Q.** **HOW DOES AT&T'S FLOW THROUGH EXPERIENCE COMPARE**
12 **WITH THE ALEC AGGREGATE YOU HAVE PRESENTED?**

13 **A.** I have performed additional analysis comparing flow through data for
14 AT&T and the aggregated ALEC data shown above. The full results
15 of my additional analysis is shown in Exhibit JMB-22. Based on this
16 additional analysis, it is obvious that the flow through capabilities
17 available to AT&T from BellSouth are inferior to those available to the
18 ALECs as a whole.

19

20 On page one of Exhibit JMB-22 I have compared ALEC Aggregate
21 and AT&T specific data concerning 1) Designed Manual Fallout, 2)
22 BellSouth System Error, 3) Total Fallout Caused by BellSouth, and 4)
23 the resulting Maximum Possible % Flow-Through for May, June and

1 July. Maximum Possible % Flow-Through is determined by
2 subtracting Total % Fallout Caused by BellSouth from 100%.

3

4 This table presents the Maximum Possible % Flow-Through results for
5 AT&T's LNP, UNE and Business LSRs.¹⁷

6 **Maximum Possible % Flow-Through Comparison**

Product	LPN	UNE	Business (Resale)
Measure / Month	ALEC/ AT&T	ALEC/ AT&T	ALEC/ AT&T
Maximum Possible % Flow- Through			
• May	32% / 33%	65% / 18%	49% / 67%
• June	37% / 19%	68% / 20%	53% / 70%
• July	37% / 19%	65% / 18%	53% / 41%

7

8 It is obvious from this data that the flow through capabilities available
9 to AT&T from BellSouth are inferior to those available to the ALECs as
10 a whole.

11

12 Because AT&T uses only the EDI interface to place LSR's, I carried
13 my analysis one step further and compared only data associated with
14 EDI transactions. Here I used official flow-through data as reported by
15 BellSouth. BellSouth calls this result its "CLEC Error Excluded Flow-
16 through", in my analysis I label this result "System Potential Flow-

¹⁷ AT&T does not actually order any Resale Business services. The LSRs BellSouth reports in this category are directory listing orders associated with UNE services.

1 Through” or “Potential EDI” on pages 2-6¹⁸. This table compares
2 Aggregate ALEC EDI results to AT&T EDI results.

3

Product	LPN		UNE		Business (Resale)	
Measure/ Interface	ALEC	AT&T	ALEC	AT&T	ALEC	AT&T
Potential EDI						
• May	45%	0%	38%	8%	54%	57%
• June	51%	0%	58%	13%	64%	100%
• July	53%	0%	58%	3.4%	51%	100%

4

5 Again, it is obvious that the capabilities available to AT&T from
6 BellSouth are inferior to those available to the ALECs as a whole.¹⁹

7 What is not so readily obvious is why.

8

9 The reason is because AT&T’s orders are being subjected to higher
10 rates of Designed Manual Fallout and BellSouth System Errors.

11 AT&T’s LNP orders encountered Designed Manual Fallout of 67%,
12 74% and 81%, respectively, during May, June and July. AT&T’s UNE
13 orders encountered Designed Manual Fallout of 62%, 60% and 49%
14 as well as BellSouth System Error rates of 20%, 20% and 33%.

15 AT&T’s “Business” orders encountered Designed Manual Fallout of
16 0%, 30% and 59% and BellSouth System Errors of 33%, 0% and

¹⁸ In the Exhibit (JMB-22) I produce data for three calculations, Basic, Achieved, and Potential as described on page 3. Here I use only the Potential data.

¹⁹ It would appear that AT&T’s results for Business are better than the ALEC results, but this is a false depiction for two reasons, 1) AT&T’s “business” orders are directory listings only and 2) the flawed understanding of the meaning of the “Potential” measurement.

1 0%.²⁰ BellSouth's system design and operational performance
2 discriminates against ALECs using LNP and UNE products as the
3 basis of their market entry.

4

5 **Q. WHAT HAPPENS TO AN AT&T OR OTHER ALEC'S LSR WHEN IT**
6 **ENCOUNTERS EITHER DESIGNED MANUAL FALLOUT OR**
7 **BELLSOUTH SYSTEM ERROR?**

8 **A.** BellSouth routes the LSR to the Local Carrier Service Center ("LCSC")
9 for manual processing. This causes delay and increases the
10 probability of input and provisioning error.

11

12 **Q. HAVE YOU QUANTIFIED THE DELAY THAT RESULTS FROM**
13 **MANUAL PROCESSING?**

14 **A.** Yes, and it is unreasonable, as explained below. While it is not
15 possible with available data to quantify the additional error rate, any
16 increase in errors is both undesirable and unreasonable.

17

18 BellSouth has long claimed that electronic orders that encounter either
19 Designed Manual Fallout and or BellSouth System Errors are
20 immediately routed to the LCSC for handling and that errors receive
21 some sort of priority handling. In March of this year BellSouth began
22 producing a report that clearly indicates this does not happen. This

²⁰ Regardless of any other conditions, whenever there are any number of issued service orders, and a zero (0) percent of BellSouth System Errors, BellSouth's flawed calculation will

1 new report is known as the CLEC LSR Report. Exhibit JMB-23
2 provides an illustrative copy of this report for one of AT&T's Operating
3 Company Numbers ("OCN").
4

5 This new report makes it possible to determine the duration between
6 the time an LSR falls out for manual processing (as a result of either a
7 Designed Manual Fallout or a BellSouth System Error) and the time
8 an LCSC representative "claims" that LSR to begin working on it. The
9 following table provides the average "Claim Interval" for AT&T's LSRs
10 in May and June.

OCN	Average Claim Interval	
	May	June
7125	40 hours	40 hours
7421	29 hours	36 hours
7680	30 hours	30 hours

11
12 Clearly, it is unreasonable to place an electronically submitted LSR
13 into a holding pattern for 29 to 40 hours. While such orders are
14 waiting to be processed, other orders actually are being processed
15 and may use resources that should have been assigned to the
16 delayed order. Delays of this length will often result in the issuance of
17 an order with a change in installation due date, which may not be
18 acceptable to the customer. Other time-dependent factors associated
19 with the order also are likely to change. Ultimately, many orders
20 delayed in this manner will have to be cancelled or supplemented.

produce a 100% result.

1 **Q. PLEASE SUMMARIZE YOUR TESTIMONY CONCERNING THE**
2 **NEED FOR FULL ELECTRONIC ORDERING WITH FLOW**
3 **THROUGH CAPABILITY.**

4 **A.** BellSouth's current ordering interfaces do not provide AT&T and other
5 ALEC's with Flow-Through Ordering capabilities equal to that enjoyed
6 by BellSouth in its retail operations. Although BellSouth has Flow-
7 Through Ordering for all of its services, it does not provide the ability
8 to submit local service requests electronically for all of the services
9 and elements that AT&T wishes to purchase. Additionally, even when
10 BellSouth makes available the ability to electronically submit a
11 request, often it does not provide the automated capability to process
12 the order on its side of the interface. Further, even when both the
13 ability to submit requests electronically and an automated capability
14 has been designed, the process often fails to perform as designed.
15 These failures on BellSouth's part are particularly evident in the
16 Business, UNE and LNP product groupings. Thus, BellSouth not only
17 provides discriminatory treatment of ALEC resale transactions, but it
18 also sets up additional levels of discrimination between resale, UNE
19 and facilities-based ALECs.

20

21 In order to eliminate this discrimination, AT&T asks this Commission
22 to order BellSouth to provide both electronic LSR submission
23 capability and a fully automated process for handling electronically

1 submitted requests for all of the services and elements available to
2 ALECs.

3

4

ISSUE 32

5

THE MAINTENANCE AND REPAIR ACCESS ISSUE

6

7 **Q. WHAT INTERFACES DOES BELL SOUTH OFFER TO AT&T FOR**
8 **ACCESS TO MAINTENANCE AND REPAIR FUNCTIONS?**

9 **A.** BellSouth provides two options for electronic trouble reporting. For
10 many (but not all) services associated with a telephone number,
11 BellSouth offers access to its proprietary Trouble Analysis Facilitation
12 Interface ("TAFI"). For both telephone number-associated exchange
13 services and individually designed services, BellSouth provides
14 electronic trouble reporting through an electronic communications
15 gateway which BellSouth calls the Electronic Communication Trouble
16 Administration ("ECTA") gateway. This interface also is referred to as
17 the Electronic Bonding Interface ("EBI"), particularly in AT&T internal
18 communications.

19

20 **Q. DO EITHER ECTA OR TAFI PROVIDE AT&T WITH**
21 **NONDISCRIMINATORY ACCESS TO BELL SOUTH'S OSS FOR**
22 **MAINTENANCE AND REPAIR FUNCTIONS?**

1 **A.** No. For services associated with a telephone number, TAFI has more
2 extensive functionality than ECTA, but TAFI is a human-to-machine
3 interface. Consequently, when an ALEC submits a trouble report via
4 TAFI, that order must be manually entered into the ALEC's own
5 internal OSS. ECTA, on the other hand, is a machine-to-machine
6 interface and can be integrated with an ALEC's own OSS, but it does
7 not have the functionality of TAFI. Thus, there is no combination of
8 choices that provides ALECs with nondiscriminatory access to
9 BellSouth's OSS for maintenance and repair functions. TAFI provides
10 extensive functionality for many services associated with a telephone
11 number, but provides no functionality for other services, and also
12 requires costly and error-prone double entry. While ECTA can be
13 integrated into ALEC systems, it provides only a limited set of
14 functionality for any type of service. Obtaining and operating both
15 interfaces simply brings the ALEC the disadvantages of both with no
16 gain in effectiveness or efficiency and at a higher cost of operations.
17 These choices are inconsistent with the requirements of the Act and
18 the needs of competitors.

19

20 **Q. BELLSOUTH USES TAFI IN ITS RETAIL OPERATIONS. DOESN'T**
21 **ALLOWING ALECS ACCESS TO TAFI PROVIDE THEM WITH THE**
22 **SAME FUNCTIONALITY THAT BELLSOUTH ENJOYS?**

1 **A.** No. ALECs cannot integrate TAFI with their own “back office” systems
2 as BellSouth does. When a BellSouth customer service
3 representative creates a trouble ticket using TAFI, the system creates
4 a record of the transaction that can be accessed and viewed from
5 BellSouth’s internal systems. An ALEC customer service
6 representative, on the other hand, must perform this process twice in
7 order to create an internal record of any trouble transaction: once in
8 TAFI and again within the ALEC’s own system.

9

10 BellSouth itself noted its superior ability to utilize TAFI functions in its
11 second Louisiana 271 application before the FCC. The FCC took
12 significant notice of BellSouth’s concession:

13 “We also note that BellSouth concedes that it
14 derives superior integration capabilities from TAFI
15 than the capabilities offered to competitors.
16 BellSouth states that TAFI is a ‘human to machine
17 interface’ meaning that new entrants using TAFI
18 cannot integrate it with the new entrant’s own
19 back office systems....BellSouth, on the other
20 hand, is able to take advantage of its own TAFI
21 system’s capability of ‘automatically interacting
22 with other systems as appropriate’ and its
23 customer service representatives need not

1 duplicate their efforts in the same way. In other
2 words, TAFI is integrated with BellSouth's other
3 back office systems."

4 FCC Second Louisiana Order, ¶ 151, emphasis added.

5

6 **Q. WHY IS A FULL FUNCTION MACHINE-TO-MACHINE**
7 **MAINTENANCE AND REPAIR INTERFACE NECESSARY?**

8 **A.** If ALECs hope to compete with BellSouth, they must provide equal or
9 better customer service and lower prices. ALECs must be able to
10 efficiently access all of an individual customer's data on every call in
11 order to address that customer's needs. Therefore ALECs must be
12 able to access their own data as well as ILEC data. For example, if an
13 ALEC wants to issue credits to a customer who had experienced
14 recurring repairs, it would need access to billing data and
15 maintenance histories. If the ALEC needed to determine whether a
16 customer was being billed for specific services, it would need access
17 to information about which services were billed and which services
18 were provided, and also would need the ability to change the services
19 being provided if they did not match the services billed to that
20 customer. ALECs must be able to add or change services and adjust
21 calling plans for customers, and require access to customer service
22 record information to keep contact information up-to-date.

23

1 A full-function, machine-to-machine interface is essential in a
2 competitive market. With a successful market entry, maintenance and
3 repair volumes will increase quickly. Approximately 4% of lines will
4 need repair treatment monthly. Customer contacts to service existing
5 lines can be expected to occur on 6% of lines each month. Within 30
6 months of a successful consumer market entry, an ALEC can expect
7 one third of its total customer contacts to be for repair and
8 maintenance. AT&T's repair call volume 30 months after a successful
9 market entry across the BellSouth states easily could approach
10 60,000 calls per month. Without a full function machine-to-machine
11 interface, an ALEC must engage in dual entry of its repair contacts,
12 entering the contact into BellSouth's system as well as its own. Dual
13 entry must occur while the customer is on-line for the ALEC to provide
14 efficient customer service. Dual entry is more time consuming and
15 results in more mistakes, requiring more service representatives.
16 Additionally the lack of a full function machine-to-machine interface
17 deprives the ALEC of performance information essential to the
18 management of its service representatives. Use of an interface like
19 TAFI that requires dual entry and is not integrated with the ALEC's
20 own OSS means that the ALEC will not have real time access to call
21 volume and connect time data required for efficient staffing.
22

1 **Q. HAS AT&T EVER REQUESTED THAT BELL SOUTH PROVIDE**
2 **FULL TAFI FUNCTIONALITY OVER THE ECTA INTERFACE?**

3 **A.** Yes. Since April 1996, AT&T consistently has requested BellSouth to
4 provide access to TAFI functionality through a machine-to-machine
5 interface like ECTA. Exhibit JMB-24 is a copy of AT&T's Ex Parte
6 letter to the FCC following a meeting on December 23, 1998, with
7 members of the Common Carrier Bureau Staff, and representatives
8 from MCI, BellSouth, and AT&T (hereinafter "AT&T 12/23/98 Ex
9 Parte"). AT&T's initial request to BellSouth is at Tab C-4. Exhibit
10 JMB-25 visually depicts AT&T requested arrangement.

11

12 Initially, BellSouth agreed to AT&T's request. In its preliminary report
13 to the Georgia PSC on OSS interfaces dated June 21, 1996, (page
14 15), BellSouth stated that it "has investigated the possibility of adding
15 to the existing [EBI] gateway a system called . . . TAFI." Exhibit JMB-
16 24, Tab C-6. In response to BellSouth's preliminary report, the
17 Georgia PSC ordered BellSouth to complete "the TAFI enhancements
18 to allow full operation of the required access by March 31, 1997."
19 Georgia PSC Order, Docket No. 6352-U (July 2, 1996). Exhibit JMB-
20 24, Tab C-7. Despite the Georgia PSC's order, BellSouth has never
21 provided those enhancements.

22

1 AT&T has pursued its request at every opportunity available to it since
2 April of 1996. The chronology at Exhibit JMB-24, Tab C-1 reflects
3 those efforts through April 3, 1998. Even though BellSouth's
4 representatives have agreed on numerous occasions that providing
5 TAFI functionality over the ECTA interface is possible and a goal
6 worth pursuing (see Exhibit JMB-23, Tab C-14 for the testimony and
7 transcript of William N. Stacy before the Georgia PSC in March 1998)
8 no development activity ever occurred.
9
10 The December 23, 1998, meeting which gave rise to the materials in
11 Exhibit JMB-24, was requested by the FCC Staff after the publication
12 of the Second Louisiana Order to increase its understanding of the
13 need for integrateable machine-to-machine interfaces for repair and
14 maintenance. The FCC Staff's written request for a meeting posed
15 specific questions; AT&T's answers and supporting diagrams may be
16 found in Exhibit JMB-24, Tab A and Tab B. During the course of this
17 meeting, BellSouth's representative, Mr. William N. Stacy, stated that
18 BellSouth could provide initial functionality in 13 months and complete
19 functionality in 18 months. Nearly two years after this meeting,
20 however, BellSouth still offers no TAFI functionality via the ECTA
21 interface.
22

1 Most recently, AT&T submitted a formal change request through the
2 Interim Change Control Process on April 18, 2000, asking for TAFI
3 functionality via the ECTA interface. AT&T does not believe that its
4 recent formal request was required, however, because of BellSouth's
5 long standing and pre-existing knowledge of the issue.

6

7 **Q. HAS BELL SOUTH TAKEN ANY ACTION TOWARD ADDRESSING**
8 **AT&T'S CHANGE REQUEST?**

9 **A.** No. However, BellSouth announced a number of what it called
10 "Updates to Maintenance Interfaces" to the ALEC community during
11 the October 25, 2000 Change Control Process Monthly Status
12 Meeting. During this meeting Mr. Gene Piatkowski discussed "DLEC
13 TAFI", "CPSS-TS", and "E Repair". No written materials were
14 provided to support Mr. Piatkowski's presentation.

15

16 **Q. CAN YOU BRIEFLY SUMMARIZE THE PRESENTATION?**

17 **A.** Yes. The functionality in DLEC TAFI was originally developed to
18 support BellSouth's use of its retail ADSL product line. BellSouth now
19 plans to make it available to ALECs and DLECs to support repair and
20 maintenance of XDSL and line sharing for high speed data. The retail
21 version has apparently been internally available to BellSouth for some
22 time but is only now being demonstrated to A/DLECs. The CLEC

1 TAFI User Guide issued in September 2000 contains a description of
2 DLEC TAFI in Chapter 14.

3
4 CPSS-TA (Circuit Provisioned Special Services – Trouble Analysis) is
5 a graphical user interface (GUI) that can be used to enter designed
6 service troubles into Work Force Administration (WFA). BellSouth
7 apparently developed the interface based on interest from small IXCs
8 and will now offer it to ALECs as well. It was stated that CPSS-TA
9 would be piloted with IXCs. No firm date for production availability
10 was provided.

11
12 E-Repair apparently is being designed initially to allow BellSouth's
13 large retail business customers to view the status of trouble reports
14 filed on their services. Development apparently is well along, and a
15 pilot with large retail business customers is expected to begin in
16 January 2001. ALECs also will be able to use this initial capability to
17 view the status of their previously entered trouble reports (currently
18 they must call BellSouth for status information). Mr. Piatkowski
19 reports that E-Repair is being designed for a much broader future
20 scope, to be implemented in stages. Phase I will provide the status-
21 only use described above. Phase II will eventually add entry and
22 viewing of all non-designed and designed service troubles. BellSouth

1 stated there would likely be a migration from TAFI and CPSS to E-
2 Repair.

3

4 **Q. WHY ARE THESE ANNOUNCEMENTS SIGNIFICANT?**

5 **A.** Although AT&T hopes that the future capabilities discussed in these
6 announcements will become useful and meaningful improvements in
7 the maintenance and repair functionalities available to ALECs, it is
8 both surprising and disappointing that BellSouth elected to pursue
9 these projects without discussing them with the ALEC community that
10 will use them. As I explained above, AT&T has a long-standing
11 request for a full-function maintenance and repair interface, and has
12 been negotiating in good faith with BellSouth regarding this issue for
13 over a year, yet BellSouth failed to raise these projects as a possible
14 solution.

15

16 Incidentally, BellSouth has failed to comply with the requirements of its
17 Change Control Process in announcing these interfaces. No written
18 description of the interfaces discussed was provided to the Bellsouth
19 Change Control Manager for distribution to the ALECs in advance of
20 the monthly status meeting and the agenda indicated under the Open
21 Discussion section "Updates to Maintenance Interfaces" rather than a
22 presentation on new interfaces. Thus it was impossible for the ALECs
23 to participate in the discussion intelligently. Further subsequent to the

1 meeting, BellSouth has not provided any specifications associated
2 with the new interfaces for ALEC review. An informal announcement
3 to the Change Control Participants is not sufficient to accomplish even
4 the limited objectives BellSouth recognizes in its language "to identify
5 interest in the new interface and obtain input from the CLEC
6 community" (CCP page 48), let alone meet the ALECs business
7 needs for the timely distribution of information and specifications.
8

9 **Q. IF BELLSOUTH COMPLETES THE "DLEC TAFI", "CPSS-TS", and**
10 **"E Repair" PROJECTS, WILL IT HAVE FULFILLED AT&T'S**
11 **REQUEST FOR A FULL-FUNCTION INTEGRATEABLE**
12 **MAINTENANCE AND REPAIR INTERFACE?**

13 **A.** Without the information identified above that BellSouth has not
14 provided, it is hard to make any firm determination. However based
15 upon the oral presentation it seems clear that DLEC TAFI and CPSS-
16 TA will be human to machine interfaces and that if E-Repair is to
17 evolve to a full function integratable interface, it will not do so in the
18 near future (before 2002). Thus, the FCC's 1998 evaluation of
19 BellSouth's maintenance and repair interfaces is still relevant today.
20

21 **Q. WHAT DID THE FCC CONCLUDE REGARDING BELLSOUTH'S**
22 **MAINTENANCE AND REPAIR INTERFACES?**

1 **A.** The FCC examined TAFI and ECTA in BellSouth's last 271
2 application, and concluded that neither provides competitors with OSS
3 functionalities equivalent to BellSouth's own capabilities. FCC
4 Louisiana II Order ¶ 148.

5
6 Regarding TAFI, the FCC concluded that TAFI does not provide
7 nondiscriminatory access because it cannot be used for all types of
8 orders and because TAFI is a "human to machine interface," meaning
9 that new entrants cannot integrate it with the new entrant's own back
10 office systems. FCC Louisiana II Order ¶¶ 149-52. The lack of
11 integration the FCC describes requires a TAFI user to take information
12 from the TAFI system and manually re-enter it into their own computer
13 systems and vice versa. FCC Louisiana II Order ¶152.

14
15 Regarding ECTA, the FCC concluded that ECTA as provided by
16 BellSouth does not provide parity to competitors because, as
17 BellSouth itself pointed out, the legacy system TAFI is superior in
18 functionality. FCC Louisiana II Order ¶ 157.

19
20 **Q.** **HAS BELLSOUTH IMPROVED THE FUNCTIONALITY OF TAFI**
21 **AND ECTA IN RESPONSE TO THE FCC'S FINDINGS?**

22 **A.** No. The FCC's findings are still relevant and valid today.

23

1 **Q. SINCE THE SECOND LOUISIANA ORDER HAS THE FCC**
2 **ADOPTED A NEW POSITION REGARDING THE NEED FOR**
3 **MACHINE-TO-MACHINE INTERFACES FOR MAINTENANCE AND**
4 **REPAIR?**

5 **A.** No. In February 1999, the FCC Staff addressed the issue in a letter to
6 BellSouth (Exhibit JMB-26, Page 2), restating the findings of the FCC
7 in the Louisiana II Order that, “We do not here conclude that TAFI’s
8 lack of integration *per se* fails to constitute nondiscriminatory access,
9 although we do believe BellSouth would provide a more complete
10 opportunity to compete if it offered competitive LECs an integrated
11 system with the same functionalities available to BellSouth’s own
12 service representatives.” FCC Louisiana II Order ¶ 152. Additionally,
13 the Staff provided a list of information that BellSouth would be
14 required to submit with its next application if it were to attempt to
15 demonstrate that it was providing nondiscriminatory maintenance and
16 repair without a machine-to-machine interface. BellSouth has not
17 attempted to make such a demonstration in this arbitration. The Staff
18 further indicated that it would seek additional information to assess the
19 competitive impact resulting from the lack of a machine-to-machine
20 interface. AT&T participated in such an information-gathering meeting
21 with the Staff on February 17, 1999. Exhibit JMB-27 is AT&T’s Ex
22 Parte letter associated with that meeting and includes the handouts
23 from AT&T’s presentation.

Until such time as BellSouth presents its next 271 Application to the FCC, the findings of the Louisiana II Order accurately describe the discriminatory nature of the maintenance and repair interfaces BellSouth is offering to AT&T. This Commission should order to BellSouth to provide full TAFI functionality via the ECTA interface on an expedited schedule.

Q. WHAT DOES AT&T REQUEST THAT THE COMMISSION ORDER REGARDING THIS ISSUE?

A. AT&T asks the Commission to order BellSouth to provide full TAFI functionality via the ECTA interface, or a another integratable machine-to-machine interface on an expedited schedule within 12 months of its Order.

SUMMARY

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. BellSouth must provide nondiscriminatory access to its OSS in order to comply with Section 251 of the Act and the implementing rules of the FCC. In addition to computer-based systems and databases, nondiscriminatory access to OSS includes any manual processes required in conjunction with or in the absence of such systems and capabilities.

1 BellSouth has not offered a resolution to the Footprint-OS/DA Issue,
2 the Equivalent Functionalities Issue or the Maintenance and Repair
3 Access Issue that would provide AT&T with the same functionalities
4 that BellSouth provides itself through its various OSS. BellSouth thus
5 has been unwilling to provide AT&T with nondiscriminatory access.
6 Likewise, BellSouth's offered Electronic Interface Change Control
7 Process and proposed Interim Change Control Process are
8 insufficient under the Act and current FCC guidance. BellSouth does
9 not provide customized routing through a commercially viable, timely,
10 repeatable process and thus is not entitled to charge for OS/DA using
11 market based rates.

12

13 BellSouth's ordering/provisioning interfaces do not provide AT&T with
14 sufficient functionality. AT&T cannot submit flow-through electronic
15 orders for the arrangements necessary to route a specific customer's
16 operator services or directory assistance calls to either BellSouth's
17 service platform on an unbranded basis or to another service platform
18 of AT&T's choosing.

19

20 BellSouth fails to provide a key pre-ordering element, the Customer's
21 Service Record electronically in a parsed manner suitable for
22 automated integration into AT&T's OSS, which would allow for

1 automated error-free population of many required fields of a Local
2 Service Request.
3
4 AT&T cannot electronically order the same range of retail services as
5 BellSouth and can electronically order only a handful of network
6 elements. Further, for a significant portion of electronically submitted
7 orders, BellSouth subsequently performs manual processing of
8 AT&T's orders that is not required to process BellSouth's orders for
9 the same services and elements. BellSouth's excessive reliance upon
10 manual ordering and provisioning processes significantly
11 disadvantages AT&T in its attempt to enter the local market using
12 either network elements or its own facilities.
13
14 BellSouth's maintenance and repair interfaces (EBI/ECTA and TAFI)
15 do not provide AT&T with nondiscriminatory access. EBI/ECTA is a
16 machine-to-machine interface that lacks the requisite functionality.
17 TAFI, on the other hand, has adequate functionality but is a human-to-
18 machine interface. AT&T has requested that BellSouth provide
19 access to TAFI functionality through EBI/ECTA, which should provide
20 better access to BellSouth's OSS for maintenance and repair
21 functions. BellSouth has agreed that such access is technically
22 feasible but has not committed to an implementation date.
23

1 Finally, the Commission should order BellSouth to provide a
2 comprehensive Change Control Process, with "cradle to grave"
3 coverage of the life cycle of an interface or process (electronic or
4 manual) and its supporting documentation (such as specifications,
5 business rules, methods, and procedures). The evolving CCP is
6 lacking in coverage of many critical areas.

7

8 For these reasons and the reasons explained above, I recommend
9 this Commission find that BellSouth's OSS interfaces offered through
10 negotiation do not comply with the provisions of Section 251 of the Act
11 and recommend that this Commission adopt AT&T's proposed
12 Interconnection Agreement language for issues 23, 25, 30, 31, and
13 32.

14

15 **Q. DOES THAT COMPLETE YOUR TESTIMONY AT THIS TIME?**

16 **A.** Yes.

17

18

19

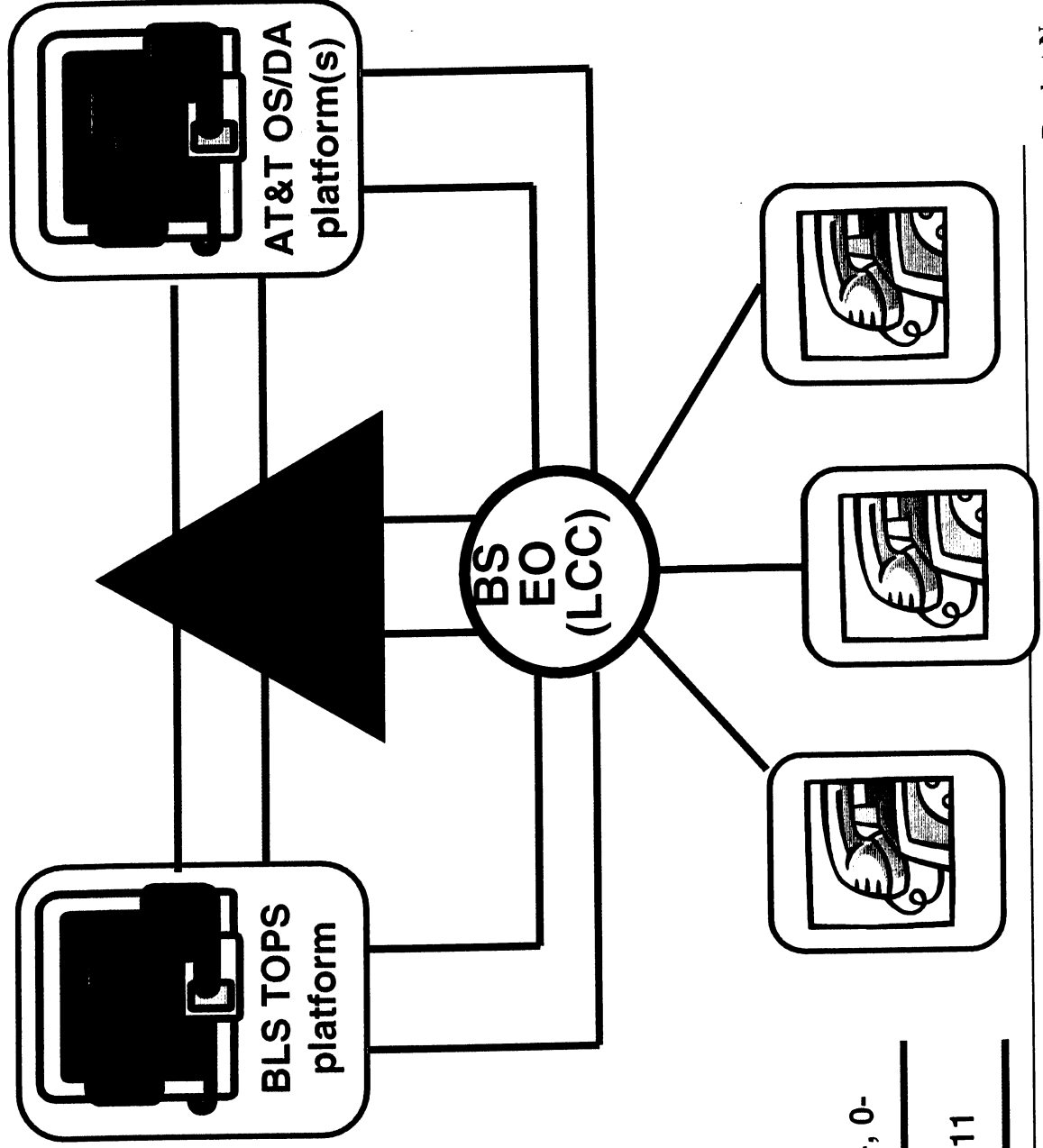
20

21

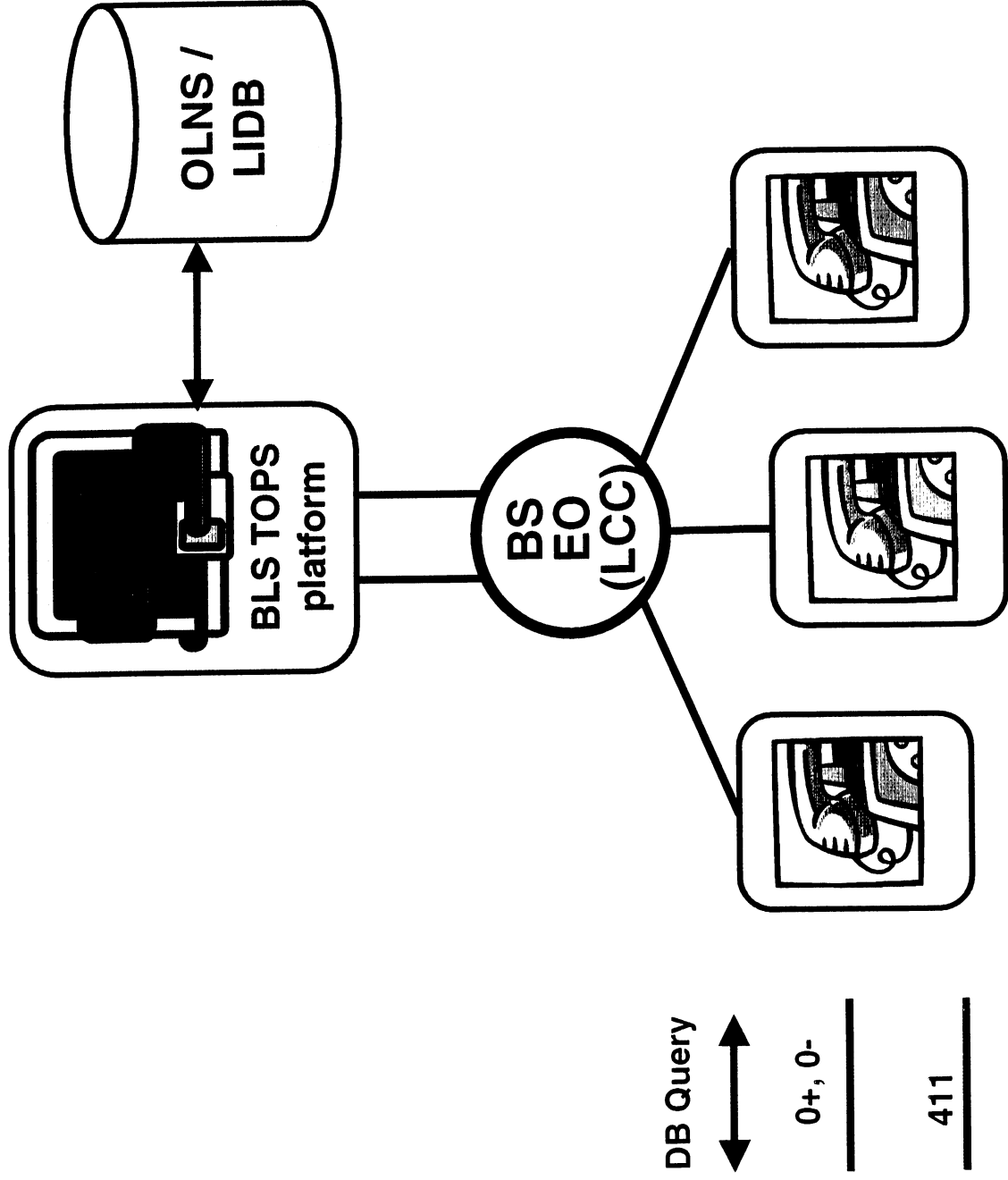
22

23

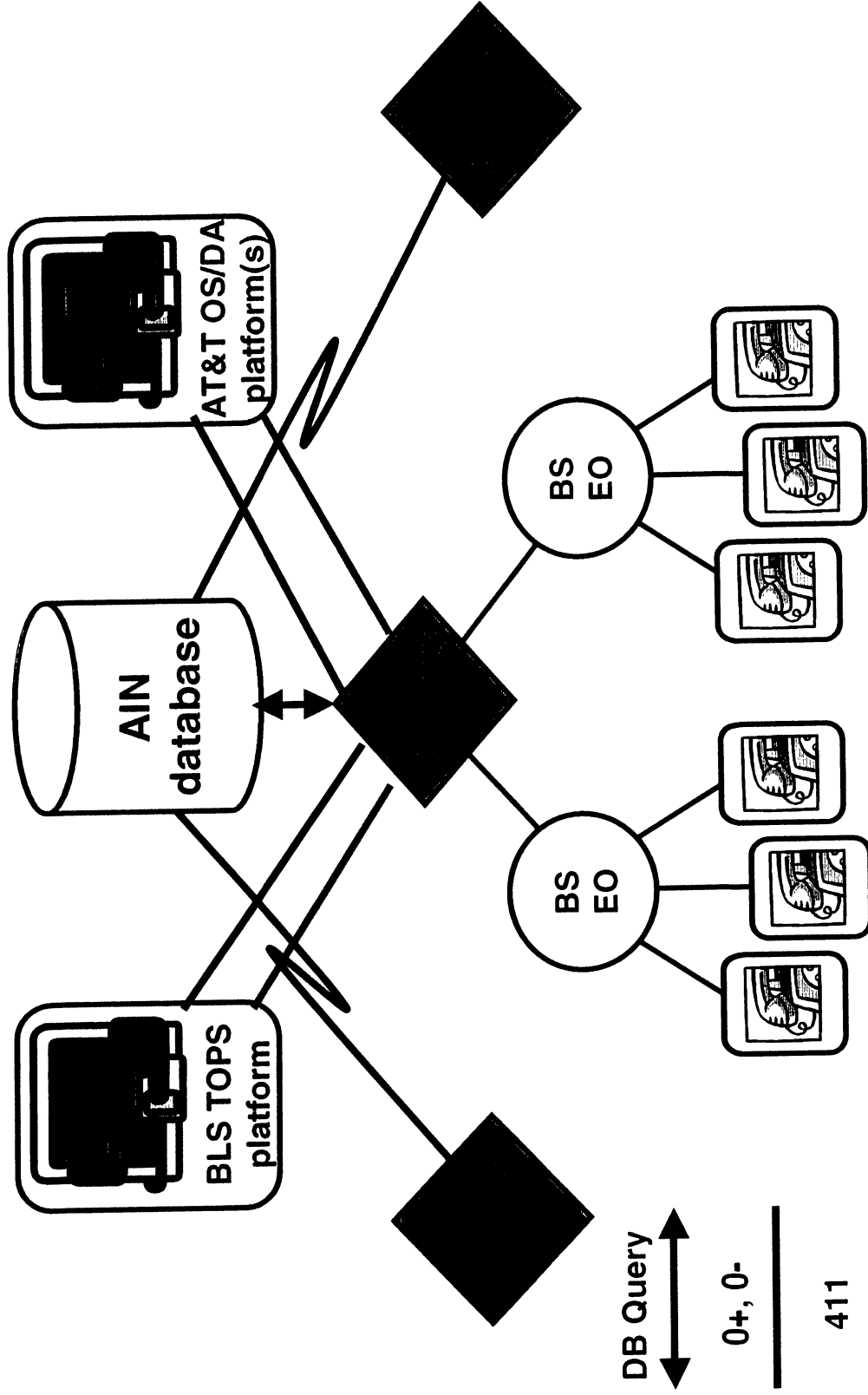
BellSouth line class code method



BellSouth OLNS method



BellSouth AIN hubbing method



OS/DA ordering

TWO-PART PROCESS

1. FOOTPRINT ORDER

Establish and implement

Trunking and routing

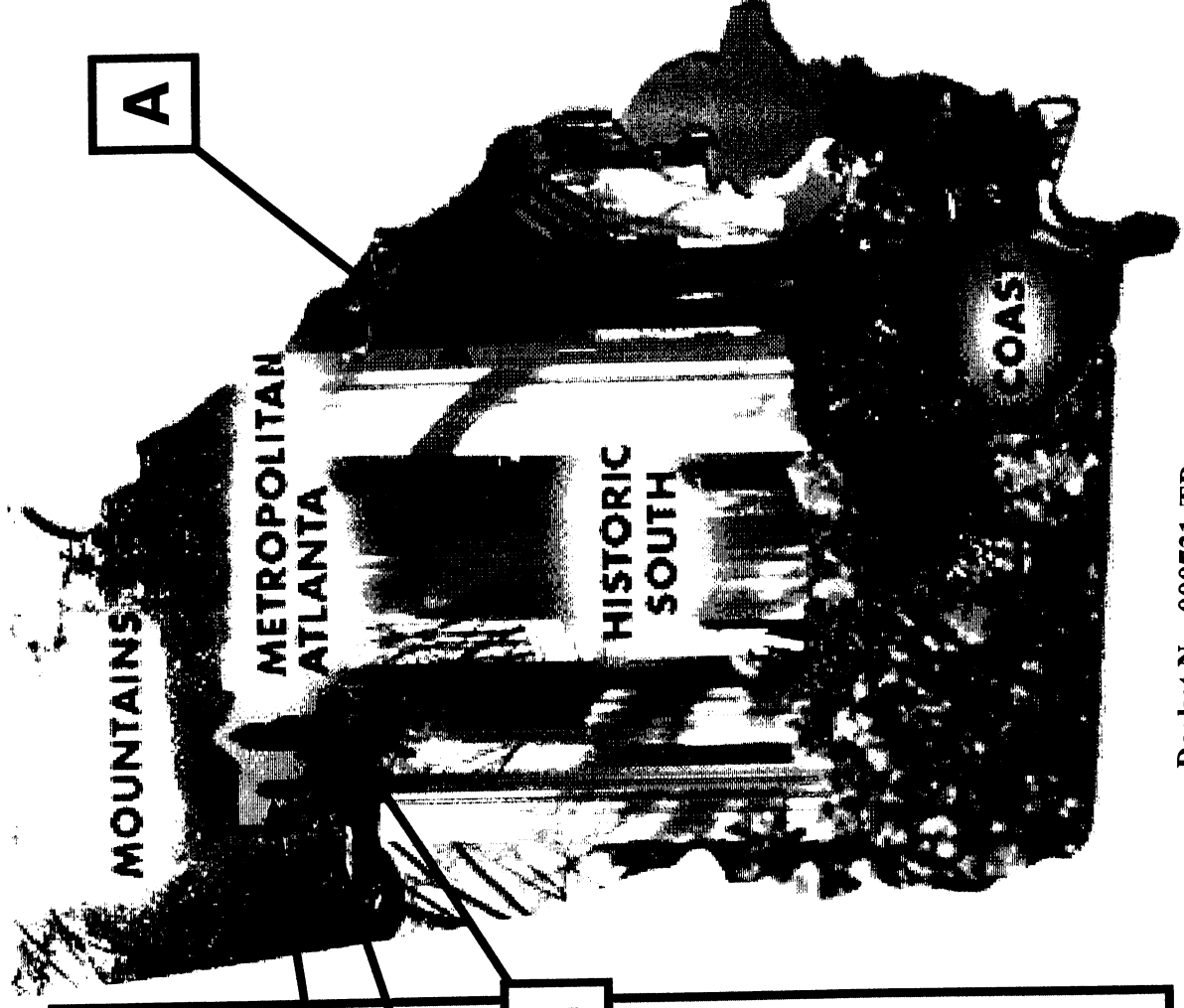
- A. CLEC branded
- B. Un-branded
- C. Other platform

Geographic grouping

2. CUSTOMER SPECIFIC ORDERS

Local Service Request (LSR)

- Identify desired arrangement



-----Original Message-----

From: Michael.Willis1@bridge.bellsouth.com

[mailto:Michael.Willis1@bridge.bellsouth.com]

Sent: Thursday, October 26, 2000 3:17 PM

To: Byrd, Dawn B (Bone), NCAM; Peacock, Billy C (Bill), NCAM

Subject: Revised LCC with Alternate Provider Language

Importance: High

Bill and Dawn: Attached is the revised LCC provisions with language re: use of an Alternate Provider. We are still waiting on a response on the electronic ordering procedures.

Thanks,

Michael

Proposed Contract Language addition for AT&T:

3.20 Procedures for Selective Carrier Routing.

- 3.20.1 In order for BellSouth to provide branded or unbranded BellSouth Operator Services (Operator Assistance and Directory Assistance), two options may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; or (2) Selective Carrier Routing using a Line Class Code platform. Custom Branding for Directory Assistance is not available for certain classes of service, such as: Hotel/Motel, WATS, cellular type 1, and certain PBX services.
- 3.20.2 Where BellSouth is providing branded BellSouth Operator Services through selective carrier routing using a line class code platform and where BellSouth is providing the local switching, AT&T's end user traffic is routed to a dedicated trunk group by uniquely identifying by line class codes such end users in BellSouth's central office. AT&T shall order the dedicated trunks from the desired BellSouth end office to the BellSouth TOPS tandem (switch).
- 3.20.3 Where BellSouth is providing unbranded BellSouth Operator Services through selective carrier routing using a line class code platform, AT&T's end user traffic is routed to a trunk group installed by BellSouth.
- 3.20.4 Where AT&T is utilizing an Alternative Operator Services Provider through selective carrier routing using a line class code platform and where BellSouth is providing the local switching, AT&T's end user traffic is routed to a dedicated trunk group, which will be provisioned in accordance with BellSouth's and the Alternate Operator Service Provider's requirements, from the desired BellSouth End Offices to the Alternative Operator Services Point of Interface.
- 3.20.5 BellSouth shall program the Line Class Codes requested by AT&T in the central offices identified by AT&T. The line class codes shall uniquely identify each set of the call blocking restrictions and each class of service AT&T offers its end users. In addition to the end user attributes that line class codes identify, line class codes are used to further identify the BellSouth central office from which AT&T offers end users service. As such, if AT&T utilizes NPAs or NXXs associated with other BellSouth rate centers to provide end user service from a particular central office, additional line class codes are required to appropriately identify and route AT&T's end users.
- 3.20.6 Line Class Codes shall be ordered through AT&T's Account Team. AT&T shall submit a written request identifying the BellSouth central offices where it would like to offer end user service; each set of end user call blocking restrictions and each class of service to be offered by AT&T; and a forecast of call volumes for each central office. BellSouth will verify the Line Class Code capacity for the central offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth Account Team

will provide AT&T with a response regarding whether the Line Class Code request can be satisfied.

- 3.20.7 If line class code capacity exists within the central offices identified by the AT&T, and AT&T has requested branded BellSouth Operator Services, AT&T will order the required dedicated trunks from the desired BellSouth end office to the BellSouth TOPs Tandem. A separate trunk group is required for Operator Assistance and Directory Assistance. The trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The AT&T Account Team may need additional information from AT&T to complete these documents and AT&T shall provide such information in a timely manner. The interval for this process is 30 days for up to 20 line class codes per end office, and the Account Team work shall work with AT&T to determine in what order AT&T wants the end offices implemented. If there is more than one end office, there may be a Project Manager assigned to ensure timely and accurate implementation. Additionally, AT&T shall also complete the CLEC Branding Questionnaire and shall fax the Questionnaire to the fax number identified on the questionnaire.
- 3.20.8 If line class code capacity exists within the central offices identified by AT&T, BellSouth shall order the trunk groups utilized to carry the unbranded Operator Services traffic to each TOPs tandem. The interval for the installation of the trunk groups shall be approximately 45 calendar days from the receipt of the completed form for each TOPs tandem. The number of trunk groups required which shall be based upon a forecast of traffic volume received from AT&T may affect the provisioning interval and, if so, AT&T shall be notified. A separate trunk group shall be required for Operator Assistance and for Directory Assistance. Trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall also submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The Account Team may need additional information from AT&T to complete these documents and AT&T shall provide said information in a timely manner.
- 3.20.8 If line class code capacity exist within the central offices identified by AT&T, and AT&T has selected an Alternate Operator Services Provider, AT&T shall order the required dedicated Trunks from the desired BellSouth end offices to the Alternative Operator Services Provider Point of Interface. The trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator.
- 3.20.9 Where BellSouth is providing Unbranded Operator Services, the line class codes may be built simultaneously with the installation of the trunk groups. Once the trunk groups are installed and the line class codes built, BellSouth Translations will translate the line class codes and point said codes to the appropriate trunk groups. The process shall take

approximately 45 calendar days. Testing shall be conducted after all work activities have been completed and shall take approximately 15 calendar days.

3.20.9 Where AT&T is using an Alternative Operator Services Provider, AT&T, at its option, order dedicated trunks between its Alternative Operator Services Provider's Point of Interface and the BellSouth Operator Services Platform. If AT&T elects to install said dedicated trunks, AT&T's Operators may provide verify busy line or line interruption services on numbers located in the BellSouth Switch at the rates set forth in Exhibit C.

3.20.10 The rates for Line Class Codes are set forth in Exhibit C of this Attachment. These charges include non-recurring charges to build and program the line class codes in each central office for each serving TOPs Tandem.

3.20.11 Electronic ordering of Line Class Codes will be negotiated between the parties once the Line Class Codes are established.

8.0 Requirements Review Minutes

October 12, 2000

Document Preparation Information

PROJECT NAME	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED
Rel 8.0 User Requirements Review	Kevin McCall		10/13/00

Announcement Information

TO	COMPANY	TO	COMPANY
Brenda Jones	BellSouth	Valerie Cottingham	BellSouth
Kevin McCall	BellSouth	Cheryl Story	BellSouth
Kathy Smith	BellSouth	Darryl Castellaw	BellSouth
Liz Goings	BellSouth	Jaime Hunter	KPMG
Wayne Johnson	BellSouth	Stephanie Smith	DSET
Yvette Brown	E.spire	Woody Roe	Albion Connect
Bob Henderson	SBC Telcom	Michelle Jones	Sprint
Lorraine Watson	WorldCom		

Meeting Information

DATE	START TIME	END TIME	LOCATION
10/12/00	10:00 A.M. EDT	12:30 P.M. EDT	205-970-3744 Access code 6637
Review of User Requirements for ENCORE Release 8.0			
CALLED BY Change Control		PHONE 205-321-2113	FAX 205-321-5160

Agenda

Agenda Items	Discussions
Introductions	
OS/DA	BST CCP advised that the OS/DA change request would be handled outside of Release 8.0. A new database called Originating Line Number Screening (OLNS) is being finalized that will provide this service in a more efficient manner. A meeting to discuss OLNS with interested CLECs is being coordinated for Monday, October 16, 2000. CCP also advised that the Methods and Procedures for OLNS are still under development.

8.0 Requirements Review Minutes

October 12, 2000

Agenda Items	Discussions
TAG Platform Upgrades	<p>BST provided an overview of the TAG platform enhancements that are in scope for TAG Release 7.5, included in Release 8.0. Those enhancements include a change from HP Unix 10.2 to 11.0.</p> <p>There will be no new functionality associated with this upgrade for TAG 2.3 (Issue 7). For TAG 7.5, the addition of DID is the only change in functionality from 7.1.2.1.</p> <p>A question was asked as to which TAG Release would be the base Release for the system upgrades due to the sunset of several TAG versions. BST will follow up and advise. The response since provided is Versions 2.2.0.11 and 7.1.2.</p> <p>Another question was raised asking if the CLECs are now responsible for gaining software licenses for the platform changes. BST responded that this should be handled in the same manner that is in place today.</p>
Review of 8.0 User Requirements	<p>BST reviewed the requirements of the following documents: 9343—LENS to allow basic class of service 9883—add the word “add, change and delete” to the feature to add field 10212—Strip USOCS not available for CSR</p> <p>The DID user requirement documents, LEO5005 and LEO8610, were not reviewed individually since this is not new functionality. The feature being implemented with Release 8.0 provides the ability to order DID via TAG.</p> <p>BST took an action item to advise when the BellSouth Business Rules for Local Ordering (BBR-LO) document will be updated with the DID information.</p> <p>The response to the action item is that the DID business rules are already published in the existing BBR-LO.</p> <p>BST advised that the user requirements for CLEC change requests that are not code impacting were reviewed as a courtesy to the CLEC community. Going forward, a review of only the code impacting user requirements will be held, and the non-code impacting user requirements will not be reviewed unless requested.</p>

10/16/00 OLNS Meeting Minutes

Participants:

Evelyn Ruffin, WorldCom
Sherri Lichtenberg, WorldCom
Graham Watkins, KPMG
Sandy Evans, Sprint
Trya Hush, WorldCom
Jennifer Browbridge, Birch Telcom
Sherrian Lively, Trivergent
Jill Williamson, AT&T
Jane Hunter, Sprint
Toni Martin, dset
Rhonda McKinney, BST
Claudette Hawkins, KMC
Thomas McFall, BST
Jeff Anderson, BST
W. Kay, KMC
Valerie Cottingham, BST
Cheryl Storey, BST

Purpose of Meeting

Provide an overview of Originating Line Number Screening (OLNS).

Opening

Valerie Cottingham opened the meeting and stated that the change request for electronically order routing to OS/DA was removed from the Release 8.0 scope because BellSouth is currently in the process of finalizing the Originating Line Number Screening (OLNS) database option that will provide this service in a more efficient manner.

OLNS Discussion

Jeff Anderson stated that the OLNS database would eliminate the need for CLECs to specify Line Class Codes for selective routing. It will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding options and reduce the cost of trunks for non-facility based CLECs when the Custom Branding option is selected. The target date for providing OLNS to non-facility based CLECs is by the end of the year for the state of Georgia.

OLNS will be driven by information off of the service order.

Jill (AT&T) questioned whether OLNS would support a non-facility CLEC if they chose someone other than BST for OS/DA. We should have the response for this question once OLNS is rolled out.

There is a project team working on cost issues and ordering procedures. Additional information will be provided as this team finalizes these issues.

Target Timeline for OLNS

Complete M&Ps.

Complete loading of the OLNS database by end of October to mid November.

Complete end-to-end testing (internal).

State of Georgia – First state to implement by 12/31/00.

All other states will be rolled out in phases – 2Q01 Target Completion date.

The CLECs recommended that the timeline be distributed through Change Control for project coordination and user requirements. Valerie advised that Change Control would coordinate this effort and provide additional information on the status of OLNS as the outstanding issues are finalized.

Contracts would need to be discussed with your Account Team representative.

**10/16/00 OLNS Conference Call with AT&T
Meeting Notes**

Participants:

Jill Williamson – AT&T
Rich Bobik – AT&T
Jeff Anderson – BST
Sandra Jones – BST
Beverly Shelton-Williams – BST
Rhonda McKinney – BST
Valerie Cottingham – BST
Cheryl Storey – BST

Purpose of Meeting:

Provide an overview of Originating Line Number Screening (OLNS).

Opening

Valerie opened the meeting and stated that BellSouth has changed the delivery method for providing OS/DA selective routing electronically. The Originating Line Number Screening (OLNS) database is an option that BellSouth is currently in the process of finalizing that will provide this service in a more efficient manner.

OLNS Discussion

Jeff Anderson stated that OLNS would benefit both CLECs and BellSouth. OLNS will eliminate the need for CLECs to specify Line Class Codes for selective routing. It will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding options and reduce the cost of trunks for non-facility based CLECs when the Custom Branding option is selected. BellSouth is working to complete the OLNS database by the end of October/mid-November time frame. End-to-end testing will need to be conducted before rolling out this service. M&Ps are being developed and will be completed prior to the rollout of this service.

A Special Provider ID (SPID) will drive OLNS. The SPID contains the owner of the line. AT&T would have a SPID common to AT&T. Jill questioned if this would be the same SPID that they use for LNP? The answer to this question is not known at this time. It was stated that we believe the OCN will be used as the SPID.

OLNS is a part of LIDB and also is an alternative to AIN.
There are three options for selective routing: AIN, LCCs and OLNS.

There is no need to set up OLNS if a CLEC wishes to use the default BellSouth OS/DA.

There is a project team working on cost issues and ordering procedures. Additional information will be provided as this team finalizes these issues.

Target Timeline for OLNS

Complete loading of the OLNS database by end of October to mid November

Complete end-to-end testing

State of GA – 1st state to implement by 12/31/00

All other states will be rolled out in phases – Targeted to be completed by 2Q01.

AT&T stated an interest in testing with BellSouth if we decide to test OLNS with CLECs.

Rhonda McKinney will be the liaison with the AT&T Account Team on OLNS.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:

AT&T'S Petition for Arbitration of
Rates, Terms and Conditions with
BellSouth Telecommunications

:
:
:
: Docket No. 11853-U
:
:
:-----

Hearing Room 507
47 Trinity Avenue
Atlanta, Georgia

Tuesday, October 31, 2000

The above-entitled matter came on for hearing
pursuant to adjournment at 2:03 p.m.

BEFORE:

ROBERT DURDEN, Chairman
DAVID BURGESS, Vice Chairman
LAUREN "BUBBA" MCDONALD, Commissioner
ROBERT BAKER, Commissioner

* * *

Brandenburg & Hasty
231 Fairview Road
Ellenwood, Georgia 30294

APPEARANCES:

On behalf of AT&T Communications of the Southern States, Inc.:

SUZANNE OCKLEBERRY, Attorney
JAMES LAMOUREUX, Attorney
MARSHA RULE, Attorney
AT&T Communications of the Southern States, Inc.
1200 Peachtree Street, Suite 8100
Atlanta, Georgia 30309

On behalf of BellSouth Telecommunications, Inc.:

DOUGLAS LACKEY, Attorney
BENNETT ROSS, Attorney
BellSouth Telecommunications, Inc.
125 Perimeter Center West, Room 376
Atlanta, Georgia 30346

On behalf of Consumers' Utility Counsel:

JIM HURT, Attorney
KEALIN CULBREATH, Attorney
Consumers' Utility Counsel Division
2 MLK Jr. Drive, Suite 356
Plaza Level, East Tower
Atlanta, Georgia 30334

On behalf of the Commission Adversary Staff:

THOMAS BOND, Attorney
Special Assistant Attorney General
State Law Department
40 Capitol Square
Atlanta, Georgia 30334

I N D E X

<u>WITNESSES:</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
David L. Talbott				
By Mr. Lamoureaux	612	--	721	--
By Mr. Lackey	--	676	--	--
Alphonso J. Varner				
By Mr. Ross	727	--	--	--
Keith Milner				
By Mr. Lackey	809	--	947	--
By Mr. Lamoureux	--	899	--	--
Ronald M. Pate				
By Mr. Lackey	951	--	--	--
By Ms. Rule	--	1089	--	--

<u>EXHIBITS:</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
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AT&T:

47 through 61 - Talbott Exhibits	669	726
62 through 64 - Talbott Exhibits	721	726
65 - CLEC Information Package	940	947
66 - LA-II Order Excerpt	1109	1112

BellSouth:

4 and 5	--	611
6 - Diagram	681	725
7, 8 Diagrams	692	725
9 through 12 - Varner Exhibits	728	729
13 - Varner Summary	804	804
14 through 21 - Milner Exhibits	809	950
22 - Milner Exhibit	887	950
23 through 39 - Pate Exhibits	1083	1111

1 own and operate. So we're not singling AT&T's employees
2 out, we're not asking them to do anything we don't do for
3 our own prospective employees. We're just saying simply,
4 AT&T, for those employees that you send in to BellSouth's
5 buildings, if they've not been your employee for over five
6 years, do -- you know, show us that you've done a criminal
7 background check. That's really all we're asking.

8 Q Let's change the subject to OSMDA. At page 63 of
9 your testimony, you say that the line class code and AIN
10 methods are available today. BellSouth has not made
11 electronic ordering of both those solutions available as of
12 today, has it?

13 A No, it has not.

14 Q And do you understand that the real issue here is
15 that AT&T wants to be able to order the routing
16 electronically, not that AT&T wants more than one routing
17 option?

18 A No, I don't think that is the entirety of the
19 issue. As I read Mr. Mills' testimony and Mr. Bradbury's
20 testimony, I think there also is a disagreement as to the
21 so-called footprint orders. But regarding the first issue
22 of electronic ordering, BellSouth will accommodate
23 electronic ordering, either in release 8.0 of its electronic
24 access, which I believe will be available on November 18th
25 of this year, or possibly in a point release that may happen

1 two to three weeks after that. So that would overcome the
2 problem of electronic ordering that you mentioned.

3 COMMISSIONER BURGESS: Let me ask a question.
4 There seemed to be some uncertainty last night whether or
5 not the electronic ordering is or is not in the next
6 release. Can you say with some definity that it is or not?

7 THE WITNESS: No, sir, unfortunately as I sit
8 here, I cannot. I talked with my boss and with the people
9 who are responsible for getting that change into the point
10 release -- or into our what we call encore releases. And
11 they said that it would either be in release 8 or it would
12 be in a point release, which would be two to three weeks
13 after that November date. So that's as definitive as I can
14 be at this moment.

15 COMMISSIONER BURGESS: If you could, I would
16 request that as a late file hearing exhibit for this
17 proceeding to update the Commission on the status of whether
18 or not the electronic ordering will be available or will not
19 be available in the current -- in the next proposed release
20 or some subsequent release.

21 THE WITNESS: Yes, sir, we'll be glad to do that.
22 And I should know just really within the -- and even
23 perhaps by tomorrow morning whether -- you know, whether
24 we'll be in 8.0 or in a point release. So I'll be glad to
25 do that.

1 BY MR. LAMOUREUX:

2 Q In fact, Mr. Milner, isn't it correct that
3 BellSouth has dropped the electronic ordering capability
4 from its expected capabilities of release 8?

5 A No, sir, that's not correct, and here's why. I
6 think what you may be referring to is a memorandum that was
7 sent to CLECs last week or the week before that said that
8 that had -- that that electronic ordering capability had
9 been dropped from release 8.0. That was a mistake on the
10 people -- on the part of the people that released that
11 memorandum. A copy of that memorandum was left in my chair
12 in my office. The first thing I did when I came in to work
13 that morning and found that memo was to find the people that
14 had written that memo and had them in my office and had them
15 retract that to show that the line class code method would
16 be available. And I immediately set about making sure that
17 the people doing the software upgrades did not divert their
18 attention and move that out of release 8.0. So that's --
19 that's an unfortunate e-mail or memorandum that might have
20 been sent to AT&T, and in fact, all CLECs, but in fact, it
21 was a mistake on the part of the people that sent that.
22 We've corrected that.

23 Q To your knowledge, has BellSouth sent out another
24 memorandum saying that the first memorandum was a mistake?

25 A A -- yes. The -- I directed the production of the

1 second memorandum that said that the line class code method
2 would still be available, in addition to another method
3 called OLNS. So yes.

4 Q When did that memorandum go out, to your
5 knowledge?

6 A Just off the top of my head, it was the day after
7 the first one was sent.

8 Q You were in the North Carolina arbitration,
9 correct?

10 A Yes, sir, I was.

11 Q Did you hear in that arbitration Mr. Pate agree to
12 provide to AT&T all the methods and procedures necessary for
13 AT&T to be able to place this footprint order?

14 A I heard that yes.

15 Q To your knowledge, has BellSouth provided all
16 those methods and procedures?

17 A Yes, it has. I understand -- in fact, I wrote
18 myself a note here, if I can find it. I think the -- I
19 think Mr. Mills said yesterday that part of that information
20 AT&T had received and that it was waiting on another part.
21 My understanding is that the part that Mr. Mills has not yet
22 seen addressed electronic ordering, using the line class
23 code method for calls that would be sent to AT&T's platform
24 rather than BellSouth's platform. I spoke to the people
25 responsible for that and they tell me that on October 26,

1 just a few days ago, Michael Willis of the AT&T account team
2 sent that information to AT&T.

3 So I understand that that information has, in
4 fact, been provided.

5 Q Are those all the methods and procedures necessary
6 for placing a footprint order?

7 A To my knowledge, they are, yes. I'm not an
8 ordering expert so you may, you know, ask Mr. Pate that same
9 question, but that's my understanding.

10 Q Okay. Let's change subjects and go to hot cuts
11 for a moment.

12 A Okay.

13 Q Would you agree with me that ensuring accurate and
14 timely hot cuts is important to development of facilities-
15 based competition?

16 A Certainly.

17 Q A firm order confirmation indicates only that an
18 order has been submitted by a CLEC without errors, correct?

19 A That's right. It's a -- what we call a so-called
20 clean order, that the order itself can be fulfilled. There
21 are not -- there are not errors in the order that would, you
22 know, leave us with doubt as to what we were supposed to do.

23 The FOC or firm order confirmation also does show the due
24 date on which the cutover would be completed.

25 Q But a FOC does not guarantee that service will be

BellSouth Telecommunications, Inc.
Legal Department
125 Perimeter Center West
Suite 376
Atlanta, GA 30346

Bennett L. Ross
General Counsel - Georgia

770 391 2416
Fax 770 391 2812

November 13, 2000

DELIVERED BY HAND

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W., Room 520
Atlanta, Georgia 30334

Re: In the Matter of: Interconnection Agreement Negotiations Between AT&T
Communications of the Southern States, Inc., Teleport Communications Atlanta,
Inc., and BellSouth Telecommunications, Inc.; Docket No. 11853-U

Dear Ms. O'Leary:

Enclosed herein please find an original and nineteen (19) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Late File Hearing Exhibits for W. Keith Milner in the above-referenced docket. I would appreciate your filing same and returning the four (4) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Very truly yours,


Bennett L. Ross

BLR:nvd
Enclosures

cc: Parties of Record

235572

BellSouth Telecommunications, Inc.
GPSC Docket No. 11853-U
October 31, 2000
Late File Hearing Exhibit No. 1
Page 1 of 1

REQUEST: Please provide an update on the status of whether or not the electronic ordering will be available in the next proposed Encore release or some subsequent release.

Response: Change Request #EDI020900_001 Electronically Order Routing to OS/DA will be included in Release 8.0, which is scheduled to be implemented on November 18, 2000. Once implemented, this electronic ordering capability will automatically identify and generate specified Line Class Codes ("LCC") on behalf of AT&T when AT&T selects the OS/DA unbranded option. Because of the number of operational issues associated with the LCC method of customized routing, other CLECs seeking to avail themselves of this electronic ordering capability must contact their respective account teams.

As BellSouth witness Milner testified at the hearing, an e-mail was sent to CLECs on October 11, 2000 indicating that Change Request #EDI020900_001 Electronically Order Routing to OS/DA had been removed from Release 8.0. Clarification of this issue was subsequently provided to CLECs by e-mail the next day. Copies of both the October 11, 2000 and October 12, 2000 e-mails, which had been requested informally by AT&T, are attached.

October 11, 2000

Attention CLECs,

There has been a change in the scope for Release 8.0. Change Request #EDI020900_001 Electronically Order Routing to OS/DA has been removed from the scope because BellSouth has developed a more efficient method of delivering this service. BellSouth is in the process of finalizing a new database called Originating Line Number Screening (OLNS) that will eliminate the need for CLECs to specify Line Class Codes for selective routing. OLNS will provide a more efficient route for Resale/UNEP Unbranding/Custom Branding services. OLNS is more efficient for the following reasons:

- It is a central database accessible from every Operator Services switch
- It eliminates the need for separate trunk groups

BellSouth is committed to providing the best solution to the CLEC community.

Additional details are forthcoming.

Please let us know if you have questions.

Thanks,

Change Control Team

October 12, 2000

Attention CLECs,

This is in clarification to the email that you received on October 11 regarding Change Request #EDI020900_001 - Electronically Order Routing to OS/DA. CLECs can currently submit a manual OS/DA order to BellSouth using Line Class Codes or by using our AIN Solution. Customized routing can still be ordered manually. Originating Line Number Screening (OLNS) is an addition to this option. We are only removing the Change Request for mechanizing the ordering process from Release 8.0.

Please let us know if you have questions.

Thanks,

Change Control Team

BellSouth Telecommunications, Inc.
GPSC Docket No. 11853-U
October 31, 2000
Late File Hearing Exhibit No. 2
Page 1 of 1

REQUEST: Please provide implementation time frame and cost involved in BellSouth's providing a facilities database check before returning the FOC transmission to a CLEC.

Response: A change request for BellSouth to provide connecting facility assignment (CFA) as part of its pre-order functionality is being provided through BellSouth's Change Control process. This change request was prioritized and scheduled for implementation on June 30, 2001. Since this change request is in a developmental stage, the costs associated with providing this functionality have not yet been determined. In the meantime, BellSouth will continue to work diligently with AT&T to resolve CFA discrepancies. As an interim process, BellSouth will continue providing a download of AT&T's CFA data via a secured website. This download allows AT&T to resolve discrepancies that may exist between AT&T records and BellSouth databases. Discrepancies are submitted to BellSouth for database correction via a spreadsheet to the BellSouth Account Team. The BellSouth Account Team will handle the clearing of any discrepancies through the Local Carrier Service Center.

CERTIFICATE OF SERVICE**Docket No. 11853-U**

This is to certify that I have this day served a copy of the within and foregoing, BellSouth Telecommunications, Inc.'s Late File Hearing Exhibit No. 1 and Exhibit No. 2 for W. Keith Milner, upon all known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

Jim Hurt, Esquire
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334

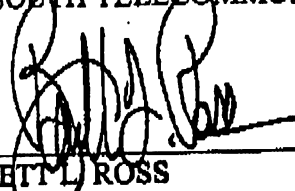
Suzanne W. Ockleberry, Esquire
AT&T - Law & Government Affairs
Suite 8100
1200 Peachtree Street, N.E.
Atlanta, GA 30309-3579

Thomas K. Bond, Esquire
Special Assistant Attorney General
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Mr. Jeffrey C. Stair
Hearing Officer
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

This 13th day of November, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



BENNETT L. ROSS
125 Perimeter Center West
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(770) 391-2416

R. DOUGLAS LACKEY
E. EARL EDENFIELD JR.
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675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
(404) 335-0754

199149

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Change Control Monthly Status Meeting	Steve Hancock - Change Control Team	10/26/00

Participants

PARTICIPANT	COMPANY
Brenda Files	BST - CCP
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Steve Hancock	BST - CCP
Bill Grant	Telcordia
Brian Rutter	KPMG
Kevin McCall	BST - NCS/CS
John Duffey	FL - PSC
Phyllis Burt	Quintessent
Carolyn Harris	Mpower
Selange Roberts	e.spire
Jean John	Quintessent
Kim Gillette	Quintessent
Shamone Stapler	ITC/Deltacom
Stephanie Smith	dset

PARTICIPANT	COMPANY
Sandy Evans	Sprint
Tyra Hush	Worldcom
Steve Murray	Rhythms
James Hunter	KPMG
Bob Mason	KPMG
Peggy Rehm	Nightfire
Anthony Zerillo	Birch Telecom
Michelle Ewton	XO
Marcia Lees	SBC Telecom
Keen Lee	Andersen Consulting/Ztel
Donna Graham	Mantiss
Jay Bradbury	AT&T
Donna Cain	AT&T
Sherian Lively	Trivergent
Gene Piatkowski	BST

Meeting Information History

DATE	START TIME	END TIME
10/25/00	10:30 AM EDT	12 NOON EDT

MEETING PURPOSE / AGENDA
Review status of pending/approved Change Requests (including defects), review current Release Management statuses and discuss Change Control Process.

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
1. OPENING	<p>The BCCM opened the meeting and covered the items we were to accomplish on this conference call:</p> <ul style="list-style-type: none"> • Review of outstanding action items • Review regulatory mandates • Review status of pending/approved Change Requests • Review status of pending defects • Report of system outages • Review current Release Management statuses • Open Discussion - Change Control Process <ul style="list-style-type: none"> - Letter of Authorization (LOA) for Service Provider Participation - Updates to the Maintenance Interfaces • Summarize Action Items
2. REGULATORY MANDATES	<p>CR0059 - Change TN Reservation Period to 45 days (pre-ordering functionality) FCC Docket #99200 - Order # FCC00-104</p> <p>Status: The deadline for compliance has been extended until December 2000. Target date for implementation is 4Q00.</p> <p>CR0169 - Conservation Rules for Number Pooling. FCC99-200 (revised on 3/31/00 to FCC00-104). Florida 954 - FCC99-249. Florida State PSC docket number is 981-444TP.</p> <p>Status: Targeted for Release 9.0 implementation (01/06/01 and 01/20/01)</p>
3. OUTSTANDING ACTION ITEMS	<p>The following outstanding Action Items are noted from the 9-27-00 Change Review/Monthly Status Meeting:</p> <p>ACTION ITEM (BELLSOUTH) - CLOSED - Distribute notification to CLEC community regarding October CCP Process Improvement meeting.</p> <p>Status: Distributed 9-28-00.</p> <p>ACTION ITEM (BELLSOUTH) - OPEN - Provide revision history with Carrier Notification Letters associated with documentation updates.</p> <p>Status: This issue was discussed at the CCP Process Improvement Meeting on Oct. 17 and an update will be provided in the follow-up meeting on 11/01/00.</p> <p>ACTION ITEM (BELLSOUTH) - CLOSED - Have BST SMEs available at the Monthly Status Meetings to discuss Carrier Notification Letters distributed by Change Control. This issue to be addressed at the October Process Improvement meetings.</p> <p>Status: BellSouth will commit to having SME's at the monthly status meetings. CCP requests from the CLECs at least a two (2) weeks notice prior to the scheduled meeting.</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>ACTION ITEM (BELLSOUTH) - OPEN - Defect/Expedite Process.</p> <p>Status: As a result of the October Process Improvement meeting, BellSouth will commit to identifying a common definition for defects. Status will be provided at the follow-up meeting on 11-01.</p> <p>Jay Bradbury (AT&T) questioned whether BST would continue to use the definition documented in the CCP process document.</p> <p>Tyra Hush went on record as stating that Worldcom does not agree with the current definition of "Defects" as documented in the CCP Process document.</p> <p>Valerie Cottingham (BST) reiterated to the CLECs that the "Defect/Expedite" process is still in "draft" mode, and acknowledged that BST still has some internal issues pertaining to the definition of defects. This will be addressed at the 11-01 Process Improvement meeting.</p>
	<p>ACTION ITEM (BELLSOUTH) - OPEN - BST provide milestones for Release management.</p> <p>Status: Discussed at the October Process Improvement meeting and status will be provided at the follow-up meeting on 11-01.</p>
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - Change Control will provide a "soft" copy of Number Pooling presentation.</p> <p>Status: Presentation provided with 9-27-00 meeting minutes.</p>
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - Change Control will distribute notification regarding EDI Infrastructure Upgrade Sub-team.</p> <p>Status: Distributed on 9/29/00.</p>
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - CLEC Community will send Change Control any identified requirements for Parsed CSR.</p> <p>Status: Requirements were received from three (3) CLECs. A kick-off conference call was held on 10-3-00 to review and reach consensus on the requirements. A Sub-team meeting was held on 10-19-00.</p>
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - Investigate if reason for system outage can be provided on web notification.</p> <p>Status: The ECS support group has begun providing cause of outage in the web posting of System 1 outages.</p>
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - Include associated documentation on the CCP Release schedule.</p> <p>Status: CCP has updated the Release Schedule on the CCP Web site to include associated documentation.</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - Provide web location for CCP Release schedule.</p> <p>Status: The CCP Release schedule is located at the following URL: www.interconnection.bellsouth.com</p> <p>Select "Local Exchange Carriers"</p> <p>Select "Change Control Process"</p> <p>Select "Statuses/Release Notification/Proposed Release Schedule"</p>
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - Add the originator to the title column on the CR Log.</p> <p>Status: Change Control has added the originator to the titles of all change requests currently on the CR Log.</p>
	<p>ACTION ITEM (BELLSOUTH) - OPEN - Change the format of the BellSouth Business Rules for Local Ordering (BBR-LO) guide.</p> <p>Status: Discussed at the October Process Improvement meeting and a status will be provided at the follow-up meeting on 11-01.</p>
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - Provide CLECs where general information can be found on 319 products.</p> <p>Status: Information on the 319 products can be found at the following URL: www.interconnection.bellsouth.com</p> <p>Select "Local Exchange Carriers"</p> <p>Select "CLEC Products"</p> <p>Select "UNE Products"</p> <p>NOTE: Questions regarding the 319 products should be directed to your Account Team representative.</p>
	<p>ACTION ITEM (BELLSOUTH) - CLOSED - Revisit CR0135 and provide originator status.</p> <p>Status: CR0135 has been placed in Pending Status.</p>
	<p>ACTION ITEM (BELLSOUTH) - OPEN - Determine if notification of BST process changes (i.e., system downtime, LCSC processes) can be provided 30 days in advance to accommodate internal M&P changes.</p> <p>Status: This issue was discussed at the CCP Process Improvement Meeting on Oct. 17 and an update will be provided at the follow-up meeting on 11/01/00.</p>
	<p>ACTION ITEM (BELLSOUTH) - OPEN - Investigate the cost for additional software needed to support the search/sort capability for CCP web site.</p> <p>Status: The CCP web site is currently being re-designed and search capability will be added upon completion in November.</p>

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
	<p>ACTION ITEM (BELLSOUTH) - OPEN - Coding changes - 30 days not sufficient time for CLECs to make coding changes, need the business rules sooner. 30 days is sufficient for M&P changes only. Depends on the size of release as to amount of advance notice needed.</p> <p>Status: This was discussed at the October Process Improvement meeting and is still under discussion. An update will be provided at the 11/01 meeting.</p> <p>ACTION ITEM (BELLSOUTH) - OPEN - CR0016 - SI Enhancement - Association with 319 products. Why are 319 products targeted for late 2001?</p> <p>Status: BellSouth Release management is working with IT to possibly implement sooner.</p> <p>ACTION ITEM (BELLSOUTH) - OPEN - CR0002 - Pre-order/Order Field Discrepancies. BST pursuing the possibility of implementing this change in Release 9.0</p> <p>Status: BST is continuing to pursue getting this request into Release 9.0.</p>
4. NEW CHANGE REQUESTS (TYPES 2-5)	<p><u>CR0030</u> - UNE via ASR21 (AT&T and Worldcom)</p> <p>Status: AT&T and Worldcom advised to leave this CR open.</p> <p><u>CR0012</u> - TAFI Functionality via ECTA Interface (AT&T)</p> <p>Status: AT&T advised to leave this CR open for further discussions with BellSouth.</p> <p><u>CR0065</u> - Add LENS 6.3 Tutorial (Trivergent)</p> <p>Status: Originator advised to place this CR on hold until they have an opportunity to review the new web-based LENS course.</p> <p><u>CR0093</u> - Electronic Change Notifications (Sprint)</p> <p>Status: Being reviewed for acceptance. Sprint will follow-up with CCP.</p> <p><u>CR0095</u> - ECTA - Attribute Validation (BST)</p> <p>Status: CLECs have indicated no interest in this request, therefore BST will cancel.</p> <p><u>CR0100</u> - TAG is failing to accurately calculate due date on deny/restore (BST)</p> <p>Status: A feature will be opened and targeted for a future release.</p> <p><u>CR0104</u> - Drop the RES ID to Requirement for xDSL Order (Nightfire)</p> <p>Status: BST response provided to originator on 8/14/00 for review. A conference call will be scheduled with originator after 10-30-00 to discuss further.</p> <p><u>CR0110</u> - LESOG not populating ZNEA & ZNHC on ACT of N or C (BST)</p> <p>Status: This has been canceled by the originator since there is no CLEC impact.</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>CR0130 - LESOG not responding to "C" order adding line & feature on Resale Accounts (BST)</p> <p>Status: 8-22-00 Re-classified as a feature.</p>
	<p>CR0132 - Fielded Completion Notifications (Worldcom)</p> <p>Status: Being reviewed for acceptance. BST will provide a response by 10-31.</p>
	<p>CR0143 - Notification MDR (Mechanized Disaster Reports) (Verizon)</p> <p>Status: Waiting on internal response per clarification request.</p>
	<p>CR015 - Need to handle HTG USOCs for all calling plans on Port/Loop Combos (BST)</p> <p>Status: Determined to be a feature and will be targeted for a future release.</p>
	<p>CR0158 - Already Pending error message on LSRs where order is being held to not auto clarify (BST)</p> <p>Status: Determined to be a feature and will be targeted for a future release.</p>
	<p>CR0166 - Cable ID Defect (AT&T)</p> <p>Status: Determined to not be a defect, but a feature will be opened and will be targeted for a future release. AT&T has escalated the validation and BST is re-investigating the validation.</p>
	<p>CR0171 - Modify CCP document (AT&T)</p> <p>Status: BellSouth recommended at 10-17 CCP Process Improvements meeting that CLECs meet and reach consensus on what changes the CLEC community would like to see made. Also, the Change Request needs to be divided into sections for discussion/voting purposes. Jill (AT&T) has coordinated a meeting for 10-27 with CLECs and BST to discuss further.</p>
	<p>CR0172 - Allow PIC/LPIC to be submitted as "No change" in LENS & TAG (Network One)</p> <p>Status: This request is 'Pending Clarification'.</p>
	<p>CR0173 - Support Value = D for response type request (RTR) TAG (Sprint)</p> <p>Status: This request is 'Pending Clarification'.</p>
	<p>CR0174 - Provide solicited notifications in TAG (BST)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0179 - TAG Navigator to CORBA Bridge (NCB) Router (BST)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0180 - API Reference Guide recommendations for CLEC Notif Server and Listener (BST)</p> <p>Status: Being reviewed for acceptance.</p>

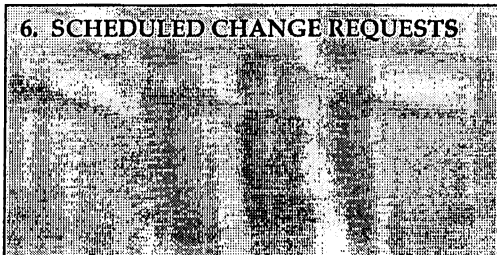
October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
	<p>CR0181 - Add Grid values for disconnect number field in TAG for all svcs. (BST)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0183 - TAG needs to display the "TTRA" in the unfielded IDENT section for Number pooling (BST)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0184 - LENS ability to view resold CSR's (XO-BST)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0186 - Interactive Agent TCIP/SSL3 (WorldCom)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0190 - Allow changes in directory deliveries - LENS99 (BST)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0198 - Increase transaction size limit (AT&T)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0201 - Extension of the retirement of TAG 3.1.1.1 (Mantiss/Access One)</p> <p>Status: Being reviewed for acceptance.</p>
	<p>CR0204 - Extension of TAG 3.1.1.1 Sunset Date (ITC/Deltacom)</p> <p>Status: Originator to cancel. Duplicate request to CR0201.</p>
<p>5. PENDING CHANGE REQUESTS</p>	<p>The following change requests were prioritized at the September 27, 2000 Change Review Meeting and are currently being assessed for impact, sizing and estimating activities. The results will be discussed at our Release 10.0 Package Meeting. The requests will be in "Candidate Request (RC)" status:</p>
	<p>CR0020 - LENS - View multiple CSRs simultaneously (Trivergent)</p>
	<p>CR0031 - Change Listing account in LENS (Alltel)</p>
	<p>CR0054 - CLEC Ordering Guide not up to date with LSOG 4 (Adelphia) (Documentation only)</p>
	<p>CR0088 - Web-based LSR (BST)</p>
	<p>CR0090 - LENS Enhancement - Add new listings (Alltel)</p>
	<p>CR0101 - EDI Pre-ordering (Nightfire)</p>
	<p>CR0102 - LENS large account inquiry (Marietta-Fibernet)</p>
	<p>CR0114 - LENS Inquiry - View Customer record (Southern Telecom)</p>
	<p>CR0124 - Provide pending service order for CSR via TAG (ITC/Deltacom)</p>
	<p>CR0131 - Split Billing Requests (BST) (Manual Environment only)</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>CR0137 - Flowthrough change request - REQ TYP CB, ACT P&Q for LNP Orders (AT&T)</p> <p>CR0139 - Update API guide to better relate the Guide to the BellSouth pre-order (BST) (Documentation only)</p> <p>CR0143 - Modify and resend FOC's and clarifications (BST)</p> <p>CR0160 - Flowthrough change request - REQ TYP BB, ACT P&Q for Loop with LNP (AT&T)</p> <p>The following change requests are in "Pending" status:</p> <p>TAG0812990003 - Parsed CSR via TAG Pre-order (AT&T) Status: Sub Team met on 10-19 to review CLEC requirements. BST in process of addressing action items from meeting. Target date to provide the Sub Team updated CLEC requirements and responses to action items is by 11/3/00.</p> <p>CR0135 - Merging of Accounts (AT&T)</p> <p>CR0144 - Add LSR Codes in LENS (BST)</p> <p>CR0144 - Remove a TN from a LENS LSR (BST)</p> <p>CR0146 - Default the listed TN (BST)</p> <p>CR0151 - Error Code Defect-LNP (AT&T)</p> <p>CR0158 - Electronic payphone service orders (BST)</p>
<p>6. SCHEDULED CHANGE REQUESTS</p> 	<p>Cheryl Storey (BST) stated that Release 10.0 originally targeted for 05-31-01 has been moved to 06-30-01 due to the overall work efforts of this Release requiring additional time.</p> <p>Tyra Hush (Worldcom) expressed concern that Releases continue to be moved out and would expect BST to be adding more CLEC prioritized requests in these releases due to the date changes.</p> <p>The following Change Requests are scheduled for upcoming releases:</p> <p>EDI0812990004 - The ability to use form for dir listing that drops from 411/DA (AT&T & Worldcom) Status: Documented process and standard form reviewed during today's meeting. Electronic process for submitting the form is being investigated.</p> <p>EDI0812990004 - Allow LSR to be submitted to change the main account number on a listings only account "J" REQ TYP (AT&T). Status: Targeted for Release 10.0 on 6/30/01.</p> <p>EDI0812990004 - Jointly assist BST in the development of fields to support the handling of remaining lines when the main account is migrating (AT&T) Status: Targeted for Release 10.0 on 6/30/01.</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>EDI0812990007 - Restrictions on LEAN/LEATN be lifted in order for complex services with different classes of service (AT&T) Status: Targeted for Release 10.0 on 6/30/01.</p>
	<p>TAG0812990001 - Provide CFA & NC/NCI codes on Pre-order via TAG (AT&T) Status: Jill (AT&T) advised to remove the "NC/NCI codes" part of request. Targeted for Release 10.0 on 6/30/01.</p>
	<p>EDI1215990001 - BST validate an address using the TN vs RSAG (AT&T) Status: Targeted for Release 9.0 on 01/06/01. NOTE: CR0133 - Migration of UNE-P Notification has been combined with this request.</p>
	<p>EDI0209000001 - Electronically Order Routing to OS/DA (AT&T) Status: This CR removed from Release 8.0 scope. BST is in the process of finalizing the Originating Line Number Screening (OLNS) database that will provide this service in a more efficient manner. Conference call held 10-16-00 with CLEC community. Change Control to provide additional details. Jay Bradbury (AT&T) stated that he did not agree with the removal of this original OS/DA request from Release 8.0 and is "officially" requesting that the original request be re-instated and targeted for Release 8.0. Tyra Hush (Worldcom) agreed that BST was pre-mature in removing this item even though the new approach was followed. (Action item noted)</p>
	<p>EDI0303000001 - BST Test Environment for EDI (AT&T) Status: Targeted for Release 8.1 on 12/9/00. A meeting is scheduled for 10/31/00 to review the user requirements.</p>
	<p>CR0002 - Pre-order/Order business rules discrepancies (AT&T) Status: Targeted for Release 10.0 on 6/30/01.</p>
	<p>CR0004 - RPON Business Rules and Error messages (AT&T) Status: Targeted for Release 9.0 on 01/06/01 (Electronic reject & flow through)</p>
	<p>CR0007 - LENS changes and updating Reference Guides (Trivergent) Status: Scheduled for Release 8.0 on 11/18/00.</p>
	<p>CR0011 - LENS - ACT of C - Change basic class of service (BST) Status: Scheduled for Release 8.0 on 11/18/00.</p>
	<p>CR0014 - Service inquiry enhancements - SL1, SL2, DS0, DS1, ISDN (AT&T) Status: Targeted for Release 10.0 on 6/30/01.</p>
	<p>CR0022 - Partial migration of UNE loops (REQTYP A) (BST) Status: Targeted for Release 10.0 on 6/30/01.</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>CR0030 - UNE to UNE migrations (BST) Status: Targeted for Release 9.0 on 01/06/01.</p> <p>CR0038 - TOS Field on LSR - REQ TYP J (TCIF 9) (BST) Status: Targeted for Release 10.0 on 6/30/01.</p> <p>CR0046 - Order Tracking Request (AT&T) Status: Targeted for Release 10.0 on 6/30/01.</p> <p>CR0045 - LENS 6.3 not stripping non-resellable USOCs (One Point) Status: Scheduled for Release 8.0 on 11/18/00.</p> <p>CR0059 - TN Reservation changed to 45 days (BST) Status: Targeted for 4Q00 implementation.</p> <p>CR0058 - Pipe Cross USOC (AT&T) Status: Targeted for LNP Release 5.4 on 12/10/00.</p> <p>CR0064 - Extended Loops (AT&T) Status: Targeted for implementation late 2001.</p> <p>CR0094 - Add DFDT to the FOC Status: Targeted for LNP Release 5.4 on 12/10/00.</p> <p>CR0169 - Conservation Rules for number pooling (BST) Status: Targeted for Release 9.0 on 01/06/01 and 01/20/01.</p> <p>CR0193 - TAG hardware/software upgrade to UNIX 11.0 platform. Status: Scheduled for Release 8.0 on 11/18/00.</p> <p>CR0208 - LESOG should allow manual handling instead of auto clarify (BST) Status: Scheduled for Release 8.0 on 11/18/00.</p> <p>CR0204 - LESOG not processing REQ TYP JB ACT-A on TCIF 7 Correctly (BST) Status: Scheduled for Release 8.0 on 11/18/00.</p>
7. IMPLEMENTED CHANGE REQUESTS	<p>The following change requests have been implemented:</p> <p>CR0109 - GA 912/229/478 NPA Split (BST) - Release 7.2 on 10/14/00.</p> <p>CR0112 - Conversion AS-IS ACT W Defect (Southern Telecom) - Release 7.1 on 9/30/00.</p> <p>CR0115 - Partial Pre-Order Query DDC (BST) - Release 7.1 on 9/30/00.</p> <p>CR0116 - Premise Visit Indicator (BST) - Release 7.1 on 9/30/00.</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	CR0111 - Update Issue 7 Map Due Date Calculation tables w/information from BST products & services interval guide (BST) - TAG Release 2.2.0.11 on 9/21/00.
	CR0116 - Remove Housenum prefix for TAG API 2.2.0.10 (BST) - Release 7.1 on 9/30/00.
	CR0129 - LESOG failing to apply ZRTI to orders (BST) - Release 7.1 on 9/30/00.
	CR0134 - TN Reservation display of switch CLI (AT&T) - CLI verbiage added to the "Helpful Hints" section of the BellSouth Pre-ordering Business Rules - posted 10/10/00.
	CR0142 - Remove the business reference for RCFRE, RCFRF, RCFRG, & RCFRN in the RCF matrix of the LEO IG (BST) - Implemented 9/29/00.
	CR0143 - Seasonal Suspend - Release 7.0 on 8/12/00.
	CR0150 - Add NPT Data Element to the ESDQ Query (BST) - TAG Release 7.1.2.1 on 10/20/00.
	CR0153 - Electronic Ordering of CO Based Line Sharing (BST) - Release 7.1 on 9/30/00.
	CR0159 - Discrepancies in BBR-LO Version 9G (BST) - Version 9H posted on 9/29/00.
	CR0163 - LESOG should not bring over FIDS on line USOCs for LNA of G (BST) - Release 7.2 on 10/14/00.
	CR0167 - Incorrect Circuit # on FOC (AT&T) - Release 7.2A on 10/21/00.
	CR0187 - LESOG should recognize Street directional for correct validation (BST) - Release 7.2 on 10/14/00.
	CR0188 - Release 7.1 Caused Defects (AT&T) - Corrected 10/6/00.
	CR0191 - Suppress the premise visit indicator (BST) - TAG Release on 10/9/00.
	CR0205 - Listing Order Defect (AT&T) - Release 7.2A on 10/21/00.
8. CANCELED CHANGE REQUESTS	ORD032700-001 - Post - FOC Clarification (AT&T)
	CR0050 - LENS 6.3 # of directories for white & yellow pages (BST)
	CR0056 - Invalid SUP, Subscription Version Defect (AT&T)
	CR0070 - Call Forwarding USOC Defect - (AT&T)
	CR0087 - "C" order process for UNE-P (Sprint)
	CR0121 - Discrepancies in BellSouth Guidelines - CG-LSOR-002 (Nextlink)
	CR0133 - Migration of UNE-P Notifications (Worldcom)
	CR0155 - Ringmaster Defect (AT&T)

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>CR0173 - New tables to BBR-LO referencing applicability to various TAG Releases (Albion Connect)</p> <p>CR0174 - Change Control Log application and release number reference (Albion Connect)</p> <p>CR0175 - TAG CLEC Test Environment - Application Support (Albion Connect)</p> <p>CR0185 - TAG/COG Lead Project Mgr Role Change (Albion Connect)</p>
9. DEFECT/EXPEDITE CHANGE REQUESTS	<p>Jay Bradbury (AT&T) and Tyra Hush (Worldcom) expressed major concerns with the length of time that several defects have been validated and targeted for a "future release" and still appear on the Change Control Log.</p> <p>Steve Hancock (BST) explained that although every attempt is made to work defects as quickly as possible, only those defects that are "High Impact" are worked within the documented 4-25 day, best effort. As the CCP documentation states, "Validated High Impact defects will be implemented with a 4-25 business day range, best effort."</p> <p>Jay Bradbury (AT&T) asked BST to add the "Impact" levels to all defects that appear on the Change Control Log. (Action item noted)</p> <p>CR0018 - YPQTY-WPQTY (Iss7) Req Type - E Reject Code must be 2 numerics - (Deltacom) Status: Open - Currently under appeal. Deltacom to provide an update.</p> <p>CR0024 - OSS'99 Ordering Guidelines (AT&T) Status: Canceled by AT&T on 10/23/00.</p> <p>CR0024 - Hunt Group Defect on a Separate CSR (Adelphia) Status: Open - Validated as a defect to be targeted for a future release.</p> <p>CR0029 - LENS TNs for each PON on bulk order (AT&T) Status: Pending clarification</p> <p>CR0034 - LEO should pull ported number & return on FOC/CN (BST) Status: Determined to be a defect and will be corrected in a future release.</p> <p>CR0037 - TAG is requiring the end user address in error for REQ TYP E: ACT of C (BST) Status: Determined to be a defect and is targeted for a future release.</p> <p>CR0037 - TAG is requiring "INIT" (BST) Status: Determined to not be a defect. Originator has appealed validation.</p> <p>CR0038 - LESOG is failing to issue Port Loop combo accurately (BST) Status: Determined to be a defect and will be targeted for a future release.</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>CR0082 - LEO is failing to edit for LOCQTY (BST) Status: BST requested further clarification from originator.</p>
	<p>CR0091 - Re-Calculate due date intervals (BST) Status: Determined to not be a defect. Waiting on originator to authorize closure.</p>
	<p>CR0099 - Order MA'd and service order info deleted (BST) Status: Determined to not be a defect, however the decision is being made as to whether this will become a feature.</p>
	<p>CR0108 - Listings over the number of 2 are not shown on LSR or order (BST) Status: Determined to be a defect and is targeted for a future release.</p>
	<p>CR0126 - LESOG should pull the correct CNF number for enhanced MMC (BST) Status: Determined to be a defect and is targeted for a future release.</p>
	<p>CR0133 - Address validating in LENS but not in TAG on old RSAG history (BST) Status: Determined to be a defect and is targeted for a future release.</p>
	<p>CR0143 - LESOG not recognizing disposition of additional/foreign listing (BST) Status: Determined to be a defect and is targeted for a future release.</p>
	<p>CR0154 - Missing Completion Notices Defect (AT&T) Status: BST validated that the completion notices did not go back to AT&T because they were manually archived by a Svc. Rep. AT&T appealed BST's response. BST has re-validated that this is a training issue and will be covering their svc. Reps regarding archiving LSR's. BST will also explore a mechanized way to restrict this mechanically from happening.</p>
	<p>CR0156 - Connect:Direct Request (AT&T) Status: Open - BST recommended to AT&T to submit this request due to problem encountered in testing. System changes have been made and AT&T is validating if the changes have corrected the problems.</p>
	<p>CR0162 - OTN Defect Issue 7 (ITC/Deltacom) Status: Determined to be a defect and will be targeted for a future release.</p>
	<p>CR0165 - Discrepancies in BellSouth Guidelines - CGT=LEO0-009-LNUM field on Loop (BST) Status: Reclassified from a feature to a documentation defect. Will be corrected in the next issue of the BBR-LO.</p>

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>CR0190 - RSAG Address vs. CSR Address (ITC/Deltacom)</p> <p>Status: Determined to not be a defect. Waiting on originator to authorize closure.</p>
	<p>CR0192 - Pre-order/Firm Order Data element inconsistencies for TCIF9 (Albion-Connect)</p> <p>Status: Determined to not be a defect. BST Business Rules for Local Ordering (BBR-LO) currently reflects the correct data characteristics for EU-Room (15 A/N)</p>
	<p>CR0194 - Missing interval guide for port/loop combos (AT&T)</p> <p>Status: Determined that this is a documentation defect and will be corrected in the next issue of the Interval Guide targeted for 12/00.</p>
	<p>CR0202 - Sup to Cancel Defect Request (AT&T)</p> <p>Status: Determined to not be a defect. AT&T is asking for further clarification.</p>
	<p>CR0205 - Listing Order Defect (AT&T)</p> <p>Status: Determined to be a defect and was corrected in Release 7.2A on 10/21/00.</p>
	<p>CR0208 - LNP Qualifier Defect (AT&T)</p> <p>Status: Determined to not be a defect. LNP is sending the DLORD as per the OSS'99 LNP FOC requirements. AT&T has asked for further clarification.</p>
<p>10. REPORT OF SYSTEM OUTAGES</p> <p>NOTE: Details of each outage are posted on the Change Control website at www.interconnection.bellsouth.com</p>	<p>The following Type 1 System outages have occurred since the last Status Meeting:</p> <ul style="list-style-type: none"> LENS - 10 EDI - 1 TAG - 3 CSOTS - 0 EG-TA - 1
<p>11. RELEASE MANAGEMENT STATUS</p>	<p>The CLECs suggested that there needs to be a clearer way of correlating Releases with documentation. In addition, there remains concern with the timeframes associated with these documents. A suggestion was made that BST should make their documentation version mirror the Release number that it is representing. BST responded that documentation versions are marked according to the platform that they support (i.e., Version 9G would equate to TCIF 9 platform)</p> <p>Tyra Hush (Worldcom) will provide a copy of a Release Package that she has received from another ILEC for BST to review for content.</p> <p>The following release management status was provided:</p>

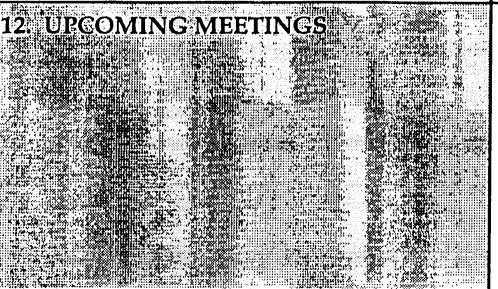
October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>LNP Release 5.3 is targeted for 11/12/00:</p> <ul style="list-style-type: none"> • Ability for BellSouth to send CLECs the RESID field on 855/865 transaction/Firm Order Confirmation (FOC) for Issue 9 (associated with XDSL functionality that was implemented with Release 7.0). • Charges associated with Service Level 1 (SL1) Non Designed Loops when more than one loop is requested per LSR for Issue 7 and 9. The charges will apply to all additional loops ordered, excluding the first loop on the LSR. (Notification only) <p>Carrier Notification Letter SN91081991 posted to the BellSouth Interconnection Web site on 10-6-00.</p>
	<p>Jay Bradbury (AT&T) asked Change Control to add the Change Request numbers that initiated the changes that are resulting in the LNP Release 5.3. (Action item noted)</p>
	<p>Release 8.0 (TAG 7.5) is scheduled for 11/18/00:</p> <ul style="list-style-type: none"> • CR0045 - Strip Non-Resellable USOCs (EMP1S and EMP1X) • CR0015 - ACT of C - Change Basic Class of Service in LENS • CR0014 - Change Verbiage on LENS Screen to read "Number of Features to Add/Change/Delete" vs. "Number of Features to Add" • CR0193 - TAG Hardware/Software Upgrade to UNIX 11.0 Platform - TAG 7.5 (Issue 9) • OSS99 - TAG DID (REQTYP N) • CR0203 - LESOG should allow manual handling instead of auto clarify • CR0204-LESOG not processing REQTYT JB/ACT=A correctly (TCIF7) <p>User Requirements distributed 10-5-00.</p> <p>User Requirements reviewed with CLEC community 10-12-00.</p> <p>Carrier Notification Letter SN91082004 posted 10-17-00 to the BellSouth Web site.</p> <p>No business rule changes are related to Release 8.0. The DID business rules are in the current BBR-LO guide.</p> <p>TAG - Release code, final Release Notes and updated API Reference Guide to be posted to the BellSouth Web site on 11-18-00.</p>
	<p>Release 8.1 is targeted for 12/09/00:</p> <ul style="list-style-type: none"> • EDI030300_001 - CLEC Test Environment <p>Meeting scheduled for 10/31/00 to review requirements with CLEC community.</p>

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
	<p>LNP Release 5.4 is targeted for 12/10/00:</p> <ul style="list-style-type: none"> • CR0068 - Pipe Cross USOC • CR0091 - Add DFDT to the FOC <p>Release 9.0 is targeted for 01/06/01 (LNP Release - Number Pooling 01/07/01):</p> <ul style="list-style-type: none"> • CR0169 - Number Pooling Mandate - Florida Only • CR0030 - UNE to UNE Migrations • EDI0812990003 - 411 Drops • CR0003 - RPON Electronic Reject & Flow Through • EDI1215990001 - TN vs RSAG Validation <p>Release 9.0 is targeted for 01/20/01:</p> <ul style="list-style-type: none"> • CR0169 - Number Pooling Mandate - All other states <p>Release 10.0 is targeted for 6/30/01 (date changed from 05/31/01):</p> <ul style="list-style-type: none"> • CR0002 - Pre-Order/Order Business Rule Discrepancies • TAG0812990001 - Provide CFA via Pre-Order • EDI0812990005 - Handling of Remaining Service • EDI0812990004 - Change Main Account Number • EDI0812990007 - Use of LEAN/LEATN Fields • CR0016 - SI Enhancement for SL1, SL2, DS0, DS1 and ISDN • CR0029 - Partial Migration of UNE Loops • CR0038 - TOS Field on ReqTyp J • CR0040 - Order Tracking Request
<p>12. UPCOMING MEETINGS</p> 	<ul style="list-style-type: none"> • The CCP Process Improvement Meeting (follow-up) is November 1, 2000 at the Crown/Ravinia Hotel in Atlanta - 9:00 AM EST - Noon - Oakwood Room. A conference bridge will be provided. The bridge number is 205-969-4213 Access Code 6541. • November 15 is the next Monthly Status Meeting. 10:30 - 12:30 AM Eastern. Conference bridge is 205-970-3741 access code 4736. • December 13 - Monthly Status Meeting. 10:30 - 12:30 AM EST. Conference bridge is 205-970-3741 access code 4736.

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
13. ISSUES - CHANGE CONTROL PROCESS	<ul style="list-style-type: none">• Letter of Authorization (LOA) for Service Provider Participation <p>Change Control explained that they will be issuing a Change Request to update the Change Control User Registration Form to include a section to identify whether a participant is a CLEC or a Service Provider.</p> <ul style="list-style-type: none">• Updates to Maintenance Interfaces <p>Gene Piatkowski (BST) provided an overview of three items that BellSouth will be implementing in the near future regarding maintenance:</p> <ol style="list-style-type: none">1. BST has developed new functionality in TAFI to allow trouble reports to be entered by DLECS using line sharing methodology. This is currently documented in the CLEC TAFI User's Guide - Issue 5, Section 14.2. BST is developing a GUI interface, built for IXCs and broadening the scope of users to include CLECs. This interface would be a man-to-machine interface and would be used to enter troubles - CPSS-TA. Currently, this interface is in the "pilot" stage and more details will be provided to the CLEC's as they materialize. Target implementation - End of 2000.3. BST is developing a future interface called E-Repair. Release I is in the final development stage and will allow large business customers to view "statuses only" of their trouble tickets. This interface is designed for the Retail community. CLECs will also be able to utilize this interface to check statuses of trouble reports. BST will "pilot" this interface in Jan, 2001. Functionality will be expanded over time.

October 25, 2000

CCP Monthly Status Meeting

MEETING MINUTES

Agenda Items	Discussion
14. 411 DROPS - STANDARD FORM	<p>BST explained how the 411 drops Multiple-Listings Log (Standard Form) is to provide a standard process for Local Service Providers to use to report multiple listings dropped from BellSouth's Directory Assistance Database, if they do not wish to call the LCSC. BST also explained that this log would not be used to resolve listing disputes/issues from BAPCO Review Pages, Contracted Advertising or Published Directory.</p> <p>Jay Bradbury (AT&T) expressed his concern that the way the form is currently designed, requiring the CLEC to "gain concurrence to submit the log to the LCSC" would become burdensome for the CLECs and BST. BST explained that the LCSC would be more than reasonable to work out simple "concurrence" for multiple logs to be submitted without a call into the LCSC each time.</p> <p>The following fields were identified on the "Multiple Listings Log" form:</p> <ul style="list-style-type: none"> • Fields 1-12 (Required) • Field 13 (only if appropriate) • Field 14 (only if appropriate) <p>BellSouth committed to inform the CLECs through Change Control when the final "Multiple Listings Log form" will be made available for implementation. In addition, BST will inform the CLECs which fields will be required. (Action item noted)</p>
15. ACTION ITEMS	<p>ACTION ITEM (BELLSOUTH) - AT&T is requesting that BellSouth reinstate their original change request EDI020900_001 and re-target this request for Release 8.0 (tent. scheduled for 11/18/00).</p> <p>ACTION ITEM (BELLSOUTH) - CCP to add the originator to CR0187, CR0188, and CR0191 in the "Implemented" section of the Change Request Log.</p> <p>ACTION ITEM (BELLSOUTH) - CCP to add the "Impact" levels of all defects that are displayed on the Change Control Log.</p> <p>ACTION ITEM (BELLSOUTH) - CCP to add the Change Request numbers that initiated the changes that are resulting in the LNP Release 5.3.</p> <p>ACTION ITEM (BELLSOUTH) - BellSouth will let the CLECs know through Change Control when the final form used for 411 drops will be available for implementation. In addition, BellSouth will inform the CLECs which fields will be required.</p> <p>ACTION ITEM (BELLSOUTH) - BellSouth will issue a Change Request to add a section to the CCP User Registration Form to identify whether a participant is a CLEC or a Service Provider.</p> <p>ACTION ITEM (BELLSOUTH) - BellSouth to provide additional information on charges associated with SL1 non-designed Loops - targeted for LNP Release 5.3 on 11/12/00.</p>

October 25, 2000
CCP Monthly Status Meeting
MEETING MINUTES

Agenda Items	Discussion
	ACTION ITEM (BELLSOUTH) - CCP to add Worldcom as a co-originator on EDI12159900_001 (Migration of UNE-P notifications). CR0133 is also combined with this change request.
	ACTION ITEM (BELLSOUTH) - CCP to include all rows of information on the Release Management Status report whether applicable for the specific release or not.

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Federal Communications Commission
Washington, D.C. 20554

September 27, 1999

Nancy E. Lubamersky
Executive Director
Regulatory Planning
U S WEST
11 Upper Ardmere Road
Larkspur, CA 94939

Dear Ms. Lubamersky:

During the course of the last several weeks, members of the Common Carrier Bureau's Policy and Program Planning Division ("Division") have met with representatives from U S WEST to discuss third-party testing of operations support systems ("OSS") and the competitive local exchange carriers ("CLECs") access to those systems. The Commission has previously indicated that for a Bell Operating Company ("BOC") to obtain approval under section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA services, it must demonstrate that it provides to CLECs nondiscriminatory access to its OSS and that its systems are operationally ready and capable of handling reasonably foreseeable demand. A number of companies, including yours, have undertaken or are developing independent third party tests of their OSS.

The purpose of the discussions between Division staff and interested parties has been to provide guidance on important elements that a third-party test should include to assist our determination that a BOC is providing nondiscriminatory access to its OSS. These views represent the current thinking of the Common Carrier Bureau and are in no way binding on the Commission. Any final determination concerning whether a BOC is providing nondiscriminatory access to its OSS will be made based upon the record in a section 271 application. It is my hope, however, that the Bureau's views on these issues will be helpful to you and other Bell Operating Companies in formulating successful section 271 applications.

1. Performance Measure Evaluation

A thorough and well-documented independent assessment of the data collection and calculation processes for performance data will considerably facilitate the Commission's review of a section 271 application. An independent review of the performance measurements is crucial in determining the accuracy and validity of performance data. In particular, the staff believes that such an independent review would include the following qualitative and quantitative aspects.

- An evaluation would include an assessment of whether the raw data being collected by the BOC is accurate, which could be tested by observing the raw data collection processes and by comparing the BOC's raw data to independently-collected data.
- The evaluation would assess the processes by which the raw data is filtered and transformed into final, reported results.
- The evaluator would assess whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules.
- The evaluator would assess the adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data (such as the controls over personnel access to the databases, and the controls that ensure that the programs and program modifications are properly authorized, documented, tested and approved).
- The evaluation would include an independent quantitative verification of the reported performance data. To accomplish this, the evaluator could be provided with the BOC's raw data and independently process the data, pursuant to the business rules, to ensure that the stated calculations and algorithms have been accurately applied.

We note that a comprehensive evaluation of the BOC's performance measure processes may include elements in addition to those listed above, as determined by the states or by an independent evaluator. Accordingly, we encourage BOCs to make the details of the proposed evaluation available to the Commission, and to the public, as they are developed.

2. Change Management Test

We also believe it critical that there be an independent review of a BOC's change management process and procedures as well as its implementation of these procedures.¹ The change management test should provide information which can be used to evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates. The independent evaluator should assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release. The following

¹ For purposes of this discussion, we use the phrase "change management process" as referring to the management of changes to OSS interfaces that affect CLECs' production or test environments. Such changes may include: 1) operations changes to existing functionality that impact the CLEC interface(s) upon a BOC's release date for new interface software; 2) technology changes that require CLECs to meet new technical requirements upon a BOC's software release date; 3) additional functionality changes that may be used at the CLEC's option, on or after a BOC's release date for new interface software; and 4) changes that may be mandated by regulatory bodies.

elements would be indicative, but not dispositive, of a satisfactory change management process and should be evaluated by the independent third-party:

- CLEC Participation: CLECs would have a role in the development of, and modifications to, the change management process.
- Release Implementation: Prior to issuing a new software release or upgrade, the BOC would provide a testing environment that mirrors the production environment in order for CLECs to test the documentation for the new release. The testing environment would be stable (*i.e.*, no changes by the BOC), and would be maintained for an adequate time-period, at least 30 days, for the CLECs to test. To ensure CLECs are not forced to cut over to a new release prematurely, a BOC could adopt a "Go/No Go" vote process to decide whether to implement a new release. Pursuant to this process the new release is delayed if a majority, such as two-thirds, of eligible CLECs vote to delay the release. Similarly, a BOC could maintain a pre-existing version, or versions, of the interface (*e.g.*, Electronic Data Interchange) when issuing a new release rather than switching directly from one version to the next.
- Memorialization of Process: The change management process would be clearly memorialized and set forth in one document that can be readily accessed by the CLECs. Any modifications to the change management process would be included with this document.
- Dispute Resolution: There would be a dispute resolution process for change management that is separate and apart from any process that is set forth in interconnection agreements. This would provide CLECs a forum specifically designated to resolve any change management disputes.

3. xDSL Testing

The third-party test would test significant volumes of xDSL orders (*i.e.*, xDSL capable loops).

4. Normal, High, and Stress Volume Testing

- Normal and High Volume Testing: The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems.² The mix of transactions would replicate expected CLEC

² An incumbent LEC's internal ordering system permits its retail service representatives to submit retail customer orders electronically, directly into the ordering system. This is known as "flow-through." Similarly, a competing carrier's orders "flow through" if they are transmitted electronically (*i.e.*, with no manual intervention) through the gateway into the incumbent LEC's ordering systems. Order flow-through applies solely to the OSS ordering function, not the OSS provisioning system. In other words, order flow-through measures only how the competing carrier's order is transmitted to the incumbent's back office ordering system, not how the incumbent ultimately completes that order. Electronically processed service

ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end (*i.e.*, through the receipt of order confirmation notice or electronic error notice). “Normal” volumes would be based on the BOC’s reasonable estimate, with input from CLECs, of daily order volumes. “High” volumes would be significantly greater than normal volumes and based on the BOC’s reasonable estimate, with input from CLECs, of forecasted demand.

- Capacity or Stress Testing: The third-party stress test would assess scalability of the BOC’s OSS systems by testing a mix of transactions similar to those in the normal and high volume testing. These volumes would be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems.

5. Pseudo-CLEC

If no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the 1996 Act, the third-party tester should build a pseudo-CLEC. The pseudo-CLEC should build an interface not only to test the quality of the BOC’s documentation for such OSS systems but also to ensure that these systems are capable of submitting and receiving valid transactions. The pseudo-CLEC should build the interface(s) using the BOC’s documentation and business rules to determine whether any CLEC can build an interface based upon these materials. Third-party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.

6. Dissemination of Information

A third-party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third-party tester that arise during the course of testing. Staff proposes the following options for reporting problems:

- Report issues as they arise; or
- Issue reports pursuant to a specified time-frame (*i.e.*, weekly or bi-weekly); or
- Issue an interim report in the middle of the test and a final report at the end.

Combinations of these options could provide optimal balance between frequency and detail.

7. Functionality

- CLECs would be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region.

orders are more likely to be completed and less prone to human error than orders that require some degree of human intervention.

- Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (*i.e.*, orders should be actually provisioned), as applicable.

This letter is intended to provide a summary of staff views regarding key elements of a third-party test which could assist our determination that a BOC's OSS is operationally ready and capable of efficiently supporting ever-increasing volumes of transactions. It is not, however, intended to be an exhaustive list of the necessary elements for a successful third-party test. Moreover, it is possible that additional issues will be raised by interested parties in future section 271 dockets. I emphasize that any final determinations regarding whether a BOC is providing nondiscriminatory access to its OSS will be made by the Commission based on the record of the BOC's 271 application for a particular state. To this end, Bureau staff is committed to working with all parties to ensure that the section 271 application process is as orderly and predictable as possible.

For information purposes, a copy of this letter will be placed in CC Docket No. 98-121³ and CC Docket No. 98-56.⁴

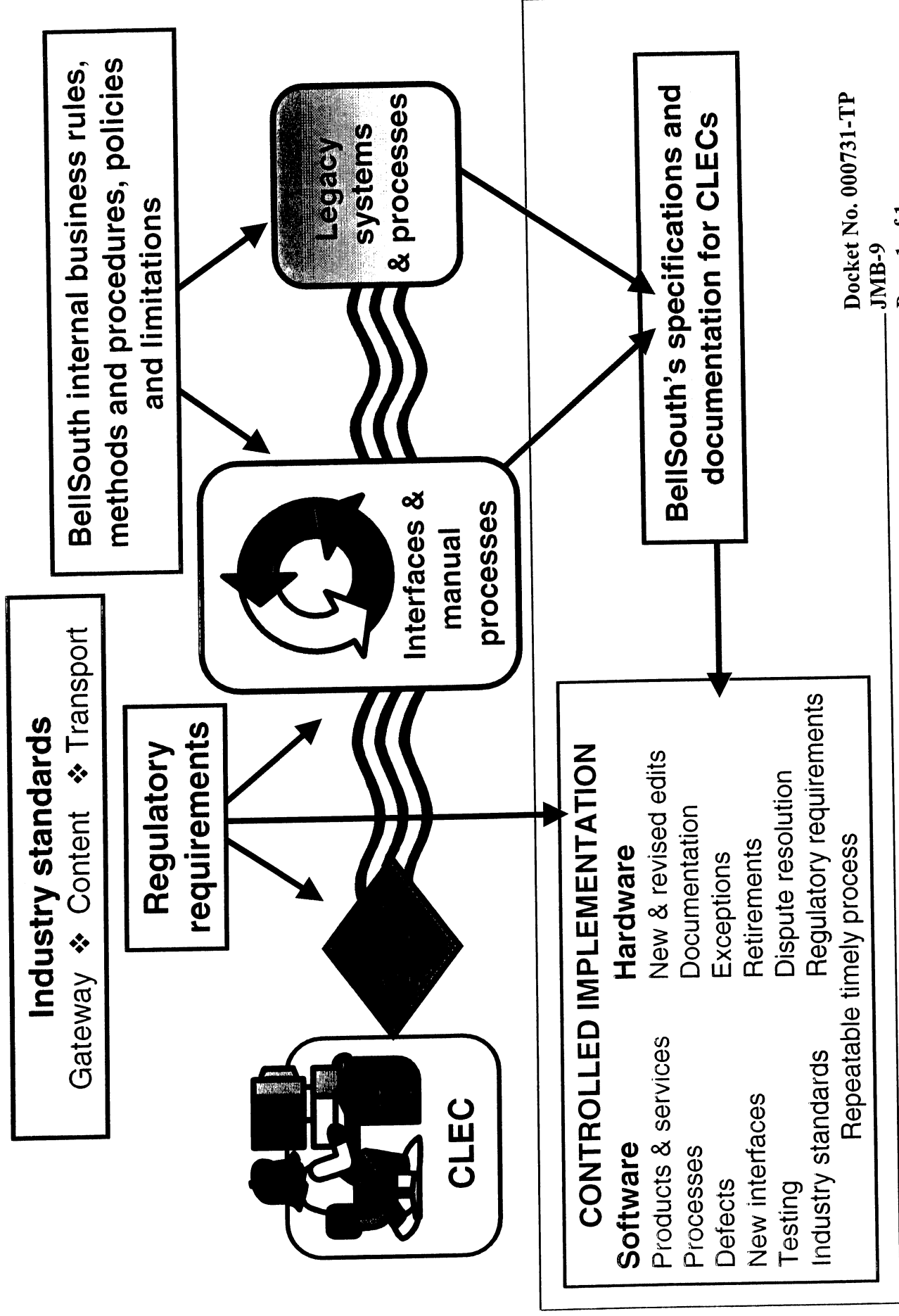
Sincerely,

Lawrence E. Strickling, Chief
Common Carrier Bureau

³ Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998).

⁴ Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

Change control process





CHANGE CONTROL PROCESS

CCP8_23.DOC

VERSION 2.0

~~AUGUST 23~~OCTOBER 27, 2000

Docket No. 000731-TP

JMB-10

Page 1 of 74

Issued: 10/27/00 ~~9/15/00~~ ~~8/23/00~~

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

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. **LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.**

This document is not to be construed as a suggestion to any manufacturer to modify or change any of its products, nor does this document represent any commitment by BellSouth Telecommunications to purchase any product whether or not it provides the described characteristics.

This document is not to be construed as a contract. It does not create an obligation on the part of BellSouth Telecommunications or the Competitive Local Exchange Carriers to perform any modification, change or enhancement of any product or service.

Nothing contained herein shall be construed as conferring by implication, estoppel or otherwise, any license or right under any patent, whether or not the use of any information herein necessarily employs an invention of any existing or later issued patent.

Issued: ~~08/23/00~~ 9/15/00 10/27/00

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

Docket No. 000731-TP
JMB-10
Page 2 of 74

VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	<p>The EICCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none">- Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages)- Incorporated manual process- Defined cycle times for process intervals and notifications- Defect Notification process- Escalation Process- Modified Change Control forms to support process changes- Changed EICCP to CCP
1.3	3/14/00	All	<p>The CCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none">- Type 6 Change Request, CLEC Impacting Defect- Increased number of participants at Change Review meetings- Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days- Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community- Web Site address for Change Control Process- Notification regarding the Retirement and

			<p>Introduction of new interfaces</p> <ul style="list-style-type: none"> - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	<p>The CCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none"> - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	<p>Section 1</p> <p>Section 8</p> <p>Section 11</p>	<ul style="list-style-type: none"> - Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1	<ul style="list-style-type: none"> - Added "testing" under process changes

		Section 2	- Clarification provided in "Change Review Participants" description.
		Section 4	- Added statement regarding submittal of Change Requests
		Part 2	- Clarification provided for documentation changes for business rules
			- Step 2-Added email notification
			- Step 3-Removed "Cancellation by BellSouth"
			- Step 3-Clarification on reject reasons
		Section 5	- Step 3-Clarification on internal validation activities
			- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround
			- Added defect implementation range
		Section 6	- Changed prioritization from "by interface" to "by category"
			- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days
			- Modified the prioritization voting rules
		Section 7	- Updates to the Introduction and Retirement of Interfaces
			- Added Type 6 escalation turnaround time
		Section 8	- Changed 3 rd Level Escalation contacts for Types 2-6
		Section 11	- Removed "Cancellation by BellSouth" and "Defect Cancelled" definitions
		Appendix A	- Removed "Cancellation by BellSouth" from Change Request Form and Checklist
			- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.

		Appendix D All	Notification Sample, CR Log Legend. - Added BellSouth Versioning Policy Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover Section 3 Section 5 Section 10 Section 11-Terms & Definitions Appendix A All	- Removed "Interim" from cover. - Updated Type 6 definition to incorporate new defect and expedite feature definitions. - Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort. - Added Internet Web sites for EDI and TAG Testing Guidelines - Updated definition for Defect. Added definitions for Expedite Feature, High, Medium and Low Impacts. - Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels. - Referenced the handling of expedites and expedite notification where appropriate.

TABLE OF CONTENTS

1.0	INTRODUCTION	<u>77</u>
2.0	CHANGE CONTROL ORGANIZATION.....	<u>109</u>
3.0	CHANGE CONTROL DECISION PROCESS.....	<u>1110</u>
4.0	CHANGE CONTROL PROCESS FLOW	<u>1513</u>
	PART 1 - TYPE 1 PROCESS FLOW	<u>1614</u>
	PART 2 - TYPES 2-5 PROCESS FLOW.....	<u>2149</u>
5.0	DEFECT/EXPEDITE NOTIFICATION PROCESS	<u>3525</u>
6.0	CHANGE REVIEW	<u>4432</u>
	PART 1 - CHANGE REVIEW MEETING	<u>4432</u>
	PART 2 - CHANGE REVIEW PACKAGE.....	<u>4432</u>
	PART 3 - PRIORITIZING CHANGE REQUESTS	<u>4533</u>
7.0	INTRODUCTION AND RETIREMENT OF INTERFACES	<u>4835</u>
8.0	ESCALATION PROCESS	<u>5036</u>
	DISPUTE RESOLUTION PROCESS.....	<u>5540</u>
9.0	CHANGES TO THIS PROCESS.....	<u>5641</u>
10.0	TESTING ENVIRONMENT	<u>5742</u>
11.0	TERMS AND DEFINITIONS	<u>5943</u>
	APPENDIX A - CHANGE CONTROL FORMS	<u>6851</u>
	SEE ATTACHED FORMS	<u>6851</u>
	APPENDIX B - RELEASE MANAGEMENT	<u>7052</u>
	SEE ATTACHED FORMS	<u>7052</u>
	APPENDIX C -ADDITIONAL DOCUMENTS	<u>7153</u>
	SEE ATTACHED DOCUMENTS.....	<u>7153</u>
	APPENDIX D -BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES.....	<u>7254</u>

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, training materials and job aids)

- Defects/Expedites

The scope of the Change Control Process **does not** include the following:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- ☐ ~~Testing Support (i.e. negotiating/coordinating test agreements and dates)~~
- ~~Issue Resolution/Questions (i.e. questions associated with interface functionality, interpreting documentation)~~
- Coordination of test agreements will continue to be supported by the Account Team
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a Change Request should be submitted to the Change Control Team.

- Change Requests of this nature will be handled through existing BellSouth processes.

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

<http://www.interconnection.bellsouth.com/>

Select "Local Exchange Carriers"

Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also

include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3.

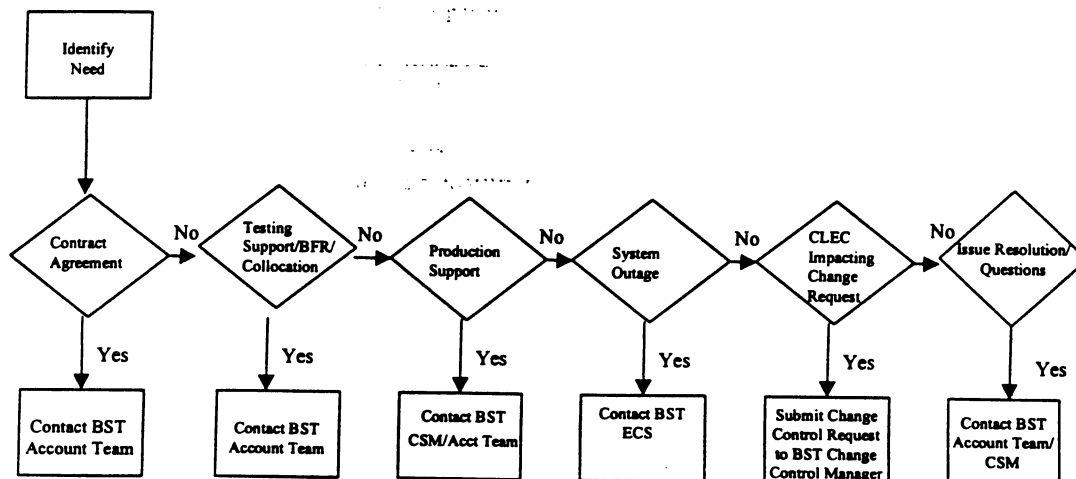
Type 6- CLEC Impacting Defects/Expedites.

A defect is Any non-Type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BellSouth has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects. Type 6 changes may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface.

The CLEC and/or BellSouth may initiate ~~defect~~these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects/expedites will be handled through the Change Control Process.

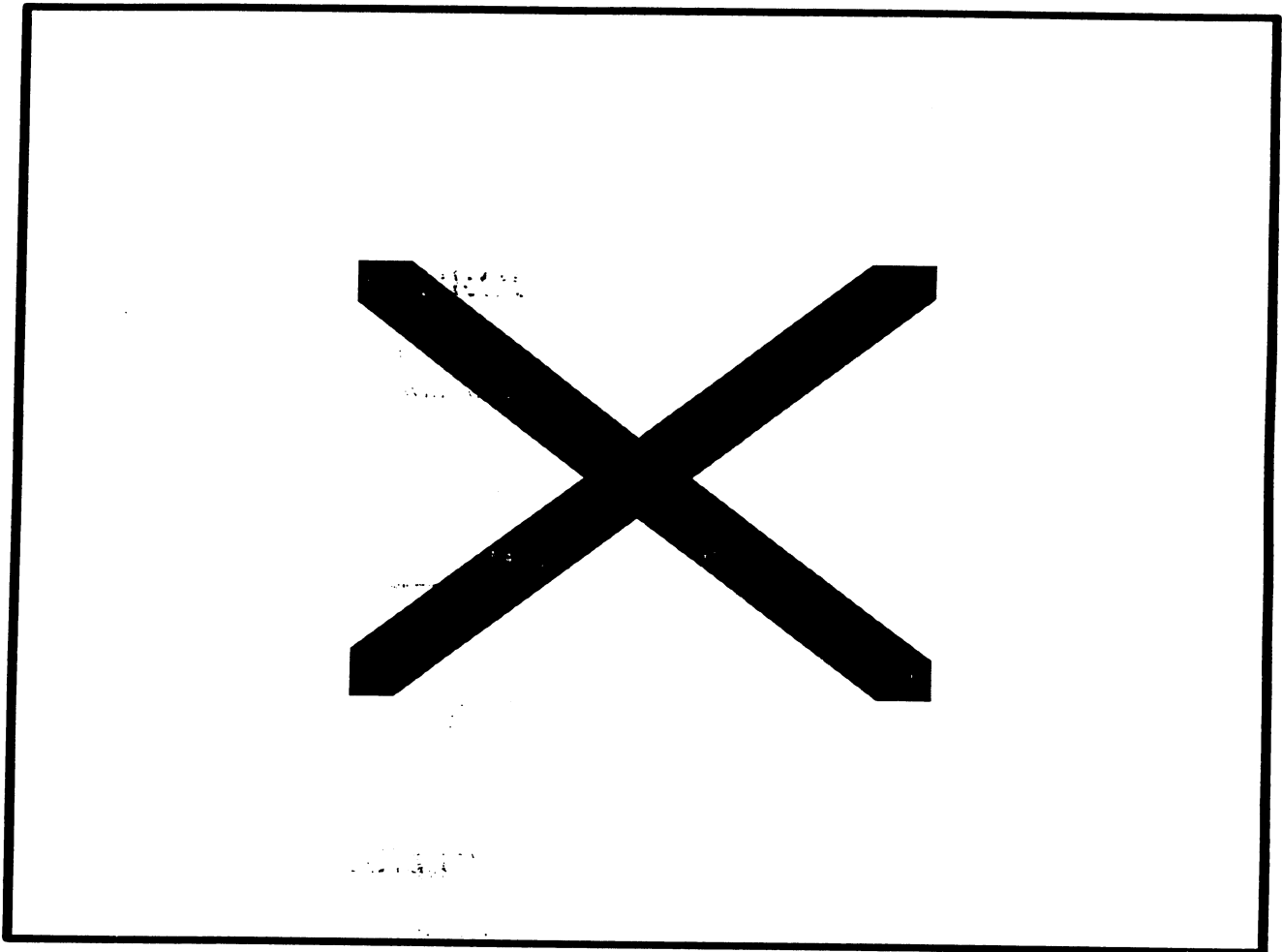


[No change was made to this figure, an error in the revision marking process resulted in its accidental modification/deletion.]

Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following two sub-sections describe the process flows for typical Type 1 through Type 5 changes. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:



[No change was made to this figure, an error in the revision marking process resulted in its accidental modification/deletion.]

Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

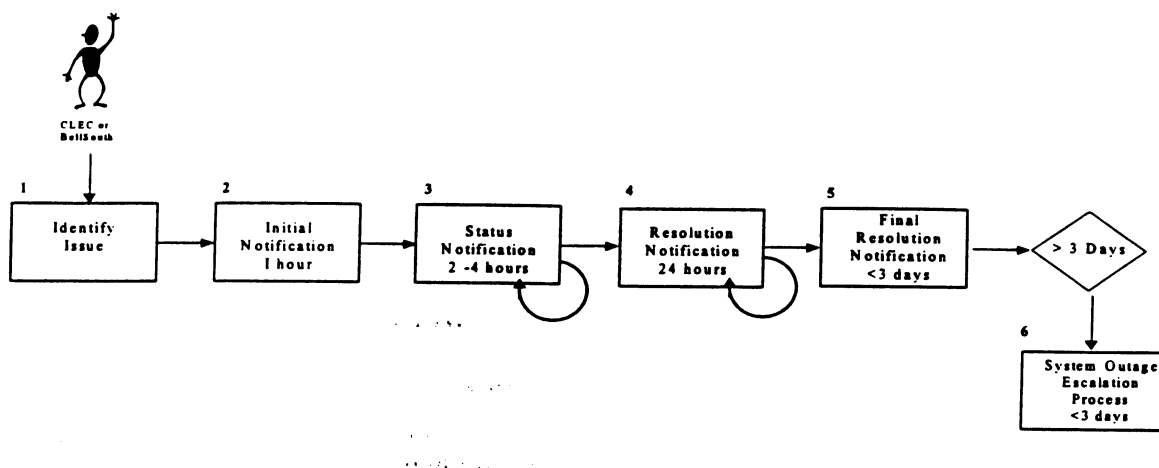


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	IDENTIFY ISSUE: <ol style="list-style-type: none"> Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. ECS will <u>provide the CLEC with a trouble ticket number and record and track the outage</u>. 	INPUTS: <ul style="list-style-type: none"> Issue Characteristics Call to ECS Helpdesk OUTPUTS: <ul style="list-style-type: none"> Recorded Outage 	N/A
2	ECS	INITIAL NOTIFICATION: <ol style="list-style-type: none"> ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis. ECS will continue to work towards the resolution of the problem 	INPUTS: <ul style="list-style-type: none"> Recorded Outage OUTPUTS: <ul style="list-style-type: none"> Industry Notification posted on Web E-mail to CLECs participating in Change Control 	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		posted to the web.
3	ECS	<p><u>STATUS NOTIFICATION: (ITERATIVE)</u></p> <ol style="list-style-type: none"> If the outage is not resolved, ECS will continue to work towards the resolution on the problem. ECS may communicate with the industry / affected parties. The following information may be discussed: <ul style="list-style-type: none"> Clarification of outage Current status of resolution Agreement of resolution If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. Proceed to Step 4 "Resolution Notification" when a resolution has been identified. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Industry Notification posted on Web <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Status Notification posted on Web Resolution information 	2-4 hour intervals
4	ECS CCCM	<p><u>RESOLUTION NOTIFICATION: (ITERATIVE)</u></p> <ol style="list-style-type: none"> The resolution notification is posted to the Web. If the item is determined to be a defect/expedite, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification". 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Status Notification posted on Web Resolution information <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Resolution Information posted on Web Final Resolution Information 	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
5	ECS	<u>FINAL RESOLUTION NOTIFICATION:</u> 1. The final resolution notification is posted on the Web.	<u>INPUTS:</u> <ul style="list-style-type: none"> Final Resolution Information <u>OUTPUTS:</u> <ul style="list-style-type: none"> Final Resolution Notification 	< 3 days
6	CCCM ECS	<u>ESCALATION</u> 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	<u>INPUTS:</u> <ul style="list-style-type: none"> Information or concern relating to a Type 1 - Systems Outage <u>OUTPUTS:</u> <ul style="list-style-type: none"> Documented Escalation Escalation Response 	> 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change-Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

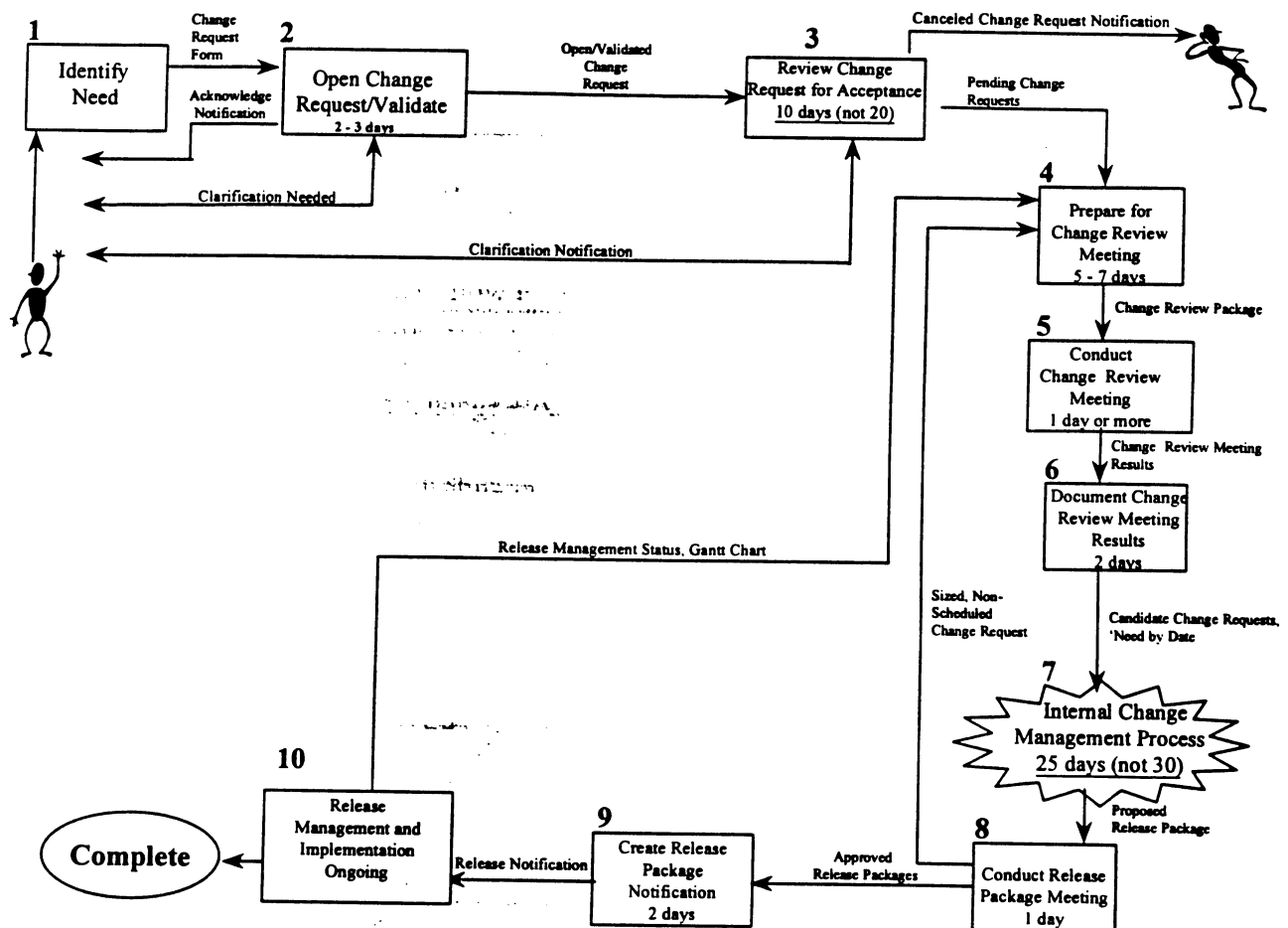


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- For the implementation of new features or modification of current functionality, fFinal Software Release Notifications requirements and specifications will be provided 30-45 calendar days or more in advance of the implementation date.
 - For the implementation of new features or modification of current functionality, Ddraft requirements and specifications for software releases or systems modifications will be provided to CLECs 90 calendar days or more in advance of the implementation date.
 - For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 calendar days or more in advance of the implementation date.
 - All additions and changes to any BellSouth Ddocumentation changes that do not impact CLEC software, for including business rules changes, will be provided to CLECs 30 calendar days or more in advance of implementation date.
- ☐ ~~CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.~~

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> <ol style="list-style-type: none"> Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. Attach related requirements and 	<u>INPUTS:</u> <ul style="list-style-type: none"> Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) <u>OUTPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form with related 	N/A

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	documentation	
2	BCCM	<p><u>OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS</u></p> <ol style="list-style-type: none"> Log Request in Change Request Log. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. Establish request status ('N' for New Request) Review change request for mandatory fields using the Change Request Form Checklist. Verify Change Request specifications and related information exists. Send Clarification Notification via email to the originator (Attachment A-4) if needed. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. <p><u>CLEC or BellSouth Originator</u> If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Completed Change Request Form with related documentation Change Request Form Checklist Change Request Clarification Response <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> New Change Request Acknowledgment Notification Validated Change Request Clarification Notification Industry Notification via e-mail and web posting 	<p>2-3 Bus Days</p> <p>Clarification times would be in addition to cycle time.</p>
3	BCCM	<p><u>REVIEW CHANGE REQUEST FOR ACCEPTANCE</u></p> <ol style="list-style-type: none"> Review Change Request and related information for content. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. Determine status of request: <ul style="list-style-type: none"> If change already exists or <u>CLEC training issue or training issue</u> forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> New Change Request Validated Change Request Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Pending Change Request Clarification Notification (if required) Cancellation Notification (if required) 	<p>20-10 Bus Days</p>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team.</p> <ul style="list-style-type: none"> • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. <p>NOTE: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions.</p> <p><u>If BellSouth feels that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is believed not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. With input from other participating CLECs, and subsequent to BellSouth's presentation, BellSouth and the originating CLEC will determine the disposition of the request. BellSouth shall consider all possible options for accommodating the request.</u></p> <p><u>4.BST may reject the change request based on the following reasons: cost, industry direction or technically not feasible to implement and will provide notification to the originating party.</u></p> <p><u>Prior to rejecting a request, all options for accommodating the request will be exhausted. The rejection reason will be shared with the CLECs for input.</u></p> <p>NOTE: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC</p>	<ul style="list-style-type: none"> • CR status updated on web 	

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	BCCM CCCM	<p><u>PREPARE FOR CHANGE REVIEW MEETING</u></p> <p>NOTE: These activities take place to prepare for Change review meetings when prioritizations take place.</p> <p><u>BCCM</u></p> <ol style="list-style-type: none"> 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. 5. <u>Provide size and scope information on each pending change request to CLECs.</u> <p><u>CCCM</u></p> <ol style="list-style-type: none"> 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Change Request Log • CLEC Draft Priority List 	5-7 Bus Days
5	BCCM CCCM	<p><u>CONDUCT CHANGE REVIEW MEETING</u></p> <p><u>Monthly Status Meetings</u></p> <ol style="list-style-type: none"> 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects/expedites) at monthly status meeting. 3. Review current Release Management statuses. 4. <u>Review issues and action items and assign owners.</u> 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • Change Request Log • CLEC Draft Priority List • Desired/Want Dates • Impact analysis <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items 	<p>1 Bus Day (or as needed based on volume)</p> <p>Meeting Day</p>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p><u>5. Present new change requests submitted since previous Monthly Status Meeting.</u></p> <p><u>Prioritization Meetings (hold as needed based on published release schedule)(held quarterly in March, June, September and December)</u></p> <ol style="list-style-type: none"> Follow Steps 1-3 from Monthly Status Meetings. Initiators present Change Requests. <u>BellSouth presents size and scope of each change request and potential release package combinations.</u> <u>Discuss Impacts.</u> <u>Prioritize Change Requests.</u> <u>Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests.</u> <u>Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate.</u> <u>Review issues and action items and assign owners.</u> 	(if required)	
6	BCCM	<p><u>DOCUMENT CHANGE REVIEW MEETING RESULTS</u></p> <ol style="list-style-type: none"> Prepare and distribute outputs from Step 5. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Change Request Log Final Candidate Request List <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Updated Change Request Log Web posting of meeting output 	2 Bus Days
7	BCCM CCCM	<p><u>INTERNAL CHANGE MANAGEMENT PROCESS</u></p> <ol style="list-style-type: none"> Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities <u>only to the Candidate Change Requests that meet</u> 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Candidate Change Request List with agreed upon 'Need by Dates' Change Request Log 	30-25 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>the criteria established by the Internal Change Management Process. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.</p> <p>2. <u>Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for each future release.</u></p> <p>3. <u>All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.</u></p>	<p>OUTPUTS:</p> <ul style="list-style-type: none"> BellSouth's Proposed Release Package (s) CLEC analysis. 	
8	BCCM CCCM	<p>CONDUCT RELEASE PACKAGE MEETING</p> <ol style="list-style-type: none"> Prepare agenda. Make meeting preparations. Evaluate proposed release schedule. Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process. Based on BST/CLEC consensus create Approved Release Package (s) and schedules. <u>During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability.</u> Identify Release Management Project Manager, if possible. Establish date for initial Release Management Project Meeting for <u>newly established releases.</u> All Change Requests that are in the approved scheduled release (s) will be changed to "S" status for "Scheduled". 	<p>INPUTS:</p> <ul style="list-style-type: none"> BellSouth's Proposed Release Package (s) BellSouth's Release Schedule Change Request Log CLEC analysis <p>OUTPUTS:</p> <ul style="list-style-type: none"> Approved Release Package Updated Change Request Log Meeting Minutes Scheduled Change Requests Non-Scheduled Change Requests (Return to Step 4) Date for initial Release Management Project Meeting for <u>newly established releases.</u> 	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
9	BCCM	<u>CREATE RELEASE PACKAGE NOTIFICATION</u> 1. Develop and distribute Release Notification Package via web.	<u>INPUTS:</u> <ul style="list-style-type: none"> Approved Release Package (s) <u>OUTPUTS:</u> <ul style="list-style-type: none"> Release Package Notification 	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	<u>RELEASE MANAGEMENT AND IMPLEMENTATION</u> 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements for software changes will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. <ul style="list-style-type: none"> For new features or changes to existing functionality, Ddraft Specifications and Requirements will be provided NLT 90 days in advance of Implementation. For new features or changes to existing functionality, Ffinal Specifications and Requirements will be provided NLT 3045 days in advance of Implementation. For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 days or more in advance of the implementation date Implementation will occur NLT 6 months from the date of the prioritization of each change request. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Approved Release Package Notification <u>OUTPUTS:</u> <ul style="list-style-type: none"> Project Release Status Implementation Date Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc Draft Specifications and Requirements Final Specifications and Requirements Documentation Changes Implemented Change Request 	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>4. <u>BellSouth Documentation changes, including business rule changes will be provided.</u></p> <ul style="list-style-type: none"> • <u>All such changes will be provided NLT 30 days in advance of Implementation.</u> • <u>Implementation will occur NLT 90 days from the date of the prioritization of each change request.</u> <p>4.5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.</p>		

Part 33 – Types 2-5 Exception/Expedited Feature Process

Situations may arise from time to time that require exception treatment for Type 2-5 changes or a Type 6 Defect Change that has been reclassified as a feature change request. An expedited feature request is made to correct the inability of a CLEC to process certain types of orders to BellSouth due to a lack of programming on BellSouth's side of the interface. An exception may involve the extension of the normal intervals for the implementation of a Type 2-5 change.

These situations will be addressed using the following Exception/Expedited Feature Process. As each situation will likely be unique, this process provides the framework in which the CCP members will make the necessary consensus decisions to achieve implementation of the feature in an exception/expedited manner.

Figure 4-4 provides the process flow for the validation and resolution of a Type 2-5 Exception/Expedited Feature Change.

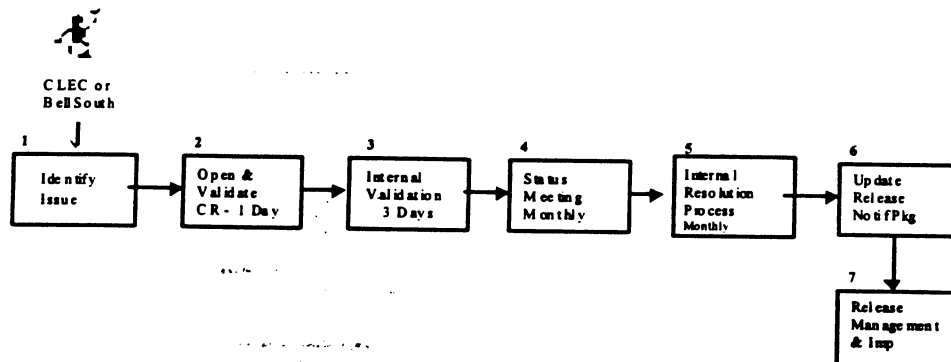


Figure 4-4. Type 2-5 Exception/Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 2-5 Exception/Expedited Feature Process. This process will be used to validate exceptions/expedites, provide status notification(s) and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table —4-4. Type 2-5 Exception/Expedited Feature Detail Process Flow

<u>Step</u>	<u>Accountability</u>	<u>Sub-processes</u> <u>Activities</u>	<u>Inputs and</u> <u>Outputs</u>	<u>Cycle Time</u>
<u>1</u>	<u>CCCM</u> <u>BCCM</u>	<u>IDENTIFY NEED</u> <ol style="list-style-type: none"> 1. <u>Identify Exception/Expedite.</u> 2. <u>Originator and CCCM or BCCM complete the standardized Change Request Form indicating that it is an Expedite Candidate.</u> 3. <u>Include description of business need and details of business impact.</u> 4. <u>Attach related requirements and specification documents. These attachments should include the following, if available:</u> <ul style="list-style-type: none"> • <u>PON</u> • <u>OCN</u> • <u>Specific scenario</u> • <u>Interface(s) affected</u> • <u>Error message (if applicable)</u> • <u>Release or API version (if applicable)</u> 4. <u>Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.</u> 	<u>INPUTS:</u> <ul style="list-style-type: none"> • <u>Type 2-5 Change Request</u> • <u>Reclassified Type 6 Change Request</u> • <u>Exception/Expedited Request</u> <u>OUTPUTS:</u> <ul style="list-style-type: none"> • <u>Completed Change Request Form (with related documentation if necessary)</u> 	<u>N/A</u>
<u>2</u>	<u>BCCM</u>	<u>OPEN & VALIDATE EXPEDITE FORM FOR COMPLETENESS</u> <ol style="list-style-type: none"> 1. <u>Log Exception/Expedite in Change Request Log.</u> 	<u>INPUTS:</u> <ul style="list-style-type: none"> • <u>Completed Change Request Form (with related documentation if necessary)</u> 	<u>1 Bus Day</u>

<u>Step</u>	<u>Accountability</u>	<u>Sub-processes</u> <u>Activities</u>	<u>Inputs and</u> <u>Outputs</u>	<u>Cycle Time</u>
		<p>2. <u>Send Acknowledgment Notification via email to initiating CLEC.</u></p> <p>2-3. <u>Establish CR status ('N' for New Exception/Expedite).</u></p> <p>3-4. <u>BCCM reviews change request for mandatory fields using the Change Request Form Checklist.</u></p> <p>4-5. <u>Verify specifications and related information exists.</u></p> <p>5-6. <u>Send Clarification Notification via email to the originator if needed.</u></p> <p>6-7. <u>Update CR Status to 'PC' for Pending Clarification if clarification is needed.</u></p> <p><u>If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.</u></p>	<p>OUTPUTS:</p> <ul style="list-style-type: none"> • <u>New Exception/Expedite</u> • <u>Acknowledgment Notification</u> • <u>Clarification Notification (if required)</u> 	
<u>3</u>	<u>BCCM</u>	<p>INTERNAL VALIDATION</p> <ol style="list-style-type: none"> 1. <u>Validate that it is an Exception/Expedite.</u> 2. <u>Perform internal exception/expedite analysis.</u> 3. <u>Determine status of request:</u> <ul style="list-style-type: none"> • <u>If request duplicates existing change request, forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled.</u> • <u>Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification.</u> • <u>If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed.</u> • <u>If request is valid, update Change Request status to 'V' for Validated Exception/Expedite and indicate appropriate Impact Level.</u> • <u>If issue does not qualify for exception/expedited treatment, re-</u> 	<p>INPUTS:</p> <ul style="list-style-type: none"> • <u>New Exception/Expedite</u> <p>OUTPUTS:</p> <ul style="list-style-type: none"> • <u>Validated Exception/Expedite</u> • <u>Exception/Expedite notification to CLEC community via e-mail and web posting</u> • <u>Clarification Notification (if required)</u> • <u>Cancellation Notification (if required)</u> 	<u>3 Bus Days</u>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p><u>classify as a standard feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the exception/expedite process flow and enter Types 2-5 normal process flow at Step 3.</u></p> <p><u>NOTE: See Section 11.0 Terms and Definitions – Expedite Status for valid status codes and descriptions.</u></p> <p><u>Exception/Expedite notification will be provided to CLEC community via e-mail and web posting.</u></p>		
4	<u>BCCM</u> <u>CCP Members</u>	<p><u>MONTHLY STATUS MEETING</u></p> <ol style="list-style-type: none"> <u>1. Provide status of Exception/Expedite.</u> <u>2. Solicit CLEC/ BST input.</u> <u>3. Reach consensus as to disposition.</u> <u>4. Update Exception/Expedite information as needed.</u> 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> <u>• Exceptions/Expedites Received</u> <u>• Change Request Log</u> <u>• Exception/Expedite Analysis</u> <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> <u>• Updated status</u> <u>• Updated Change Request Log</u> <u>• Meeting minutes</u> 	<u>Monthly or when status changes, whichever occurs first.</u>
5	<u>BCCM</u>	<p><u>INTERNAL RESOLUTION PROCESS</u></p> <ol style="list-style-type: none"> <u>1. Schedule and evaluate Exceptions/Expedites based on capacity and business impacts to the CLECs and BellSouth.</u> <u>2. Provide status updates to the CLEC community via email as the status changes until the exception/expedite is implemented.</u> <p><u>Exceptions will be implemented in the release determined by the consensus reached in Step 4.</u></p> <p><u>Expedites will be implemented in the current, next release, or point release,</u></p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> <u>• CLEC/ BST input</u> <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> <u>• Exceptions/Expedites Release Schedule</u> 	<u>Monthly or when status changes, whichever occurs first.</u>

<u>Step</u>	<u>Accountability</u>	<u>Sub-processes</u> <u>Activities</u>	<u>Inputs and</u> <u>Outputs</u>	<u>Cycle Time</u>
		best effort, as determined by the consensus of the CCP Members at the Monthly Status Review Meeting.		
<u>6</u>	<u>BCCM</u>	<p><u>UPDATE RELEASE PACKAGE NOTIFICATION</u></p> <ol style="list-style-type: none"> 1. <u>Update and distribute release notification package via web.</u> 2. <u>All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".</u> <p><u>Note: The release notification will be published in a timely manner, based on the release constraints associated with the expedite.</u></p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • <u>Exception/Expedite Feature Information</u> <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • <u>Updated Release Package Notification</u> • <u>Scheduled Change Request</u> 	Based on release constraints for expedites (may be less than 30 days).
<u>7</u>	<u>BCCM</u>	<p><u>RELEASE MANAGEMENT AND IMPLEMENTATION</u></p> <p><u>The following release management activities will pertain to Type 2-5 Exception/Expedited Feature changes:</u></p> <ol style="list-style-type: none"> 1. <u>Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings.</u> 2. <u>BellSouth business requirements will be presented to CLECs for expedited features (if applicable). If needed, changes will be incorporated and requirements re-baselined.</u> 3. <u>Once an Exception/Expedited Feature Change is implemented in a release, the status will be changed to "I" for Change Implemented.</u> 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • <u>Approved Release Package Notification</u> <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • <u>Project Release Status</u> • <u>Implementation Date</u> • <u>Implemented Change Request</u> 	Ongoing

DRAFT

5.0 DEFECT/EMERGENCY CHANGE/EXPEDITE NOTIFICATION PROCESS

A CLEC/BST identified defect/~~emergency change~~~~expedite~~ will enter this process through the Change Management Team as a Type 6 Change Request. If the defect ~~/expedite~~ is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

CLEC Notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

A **defect** is any non-type 1 change where a BellSouth interface used by a CLEC which is in production and:

- is not working in accordance with the BellSouth baseline business requirements or
- is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth.
- or where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data.

Definition of a defect also This includes errors in documentation, unclear documentation or missing documentation defects.

~~An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.~~

~~Type 6~~Defect Change Requests will have three Impact Levels:

- **High Impact**

The failure causes impairment of critical system functions and no electronic workaround solution exists.

DRAFT

~~Expedited features will be treated as High Impact.~~

- **Medium Impact**

The failure causes impairment of critical system functions, though a workaround solution does exist.

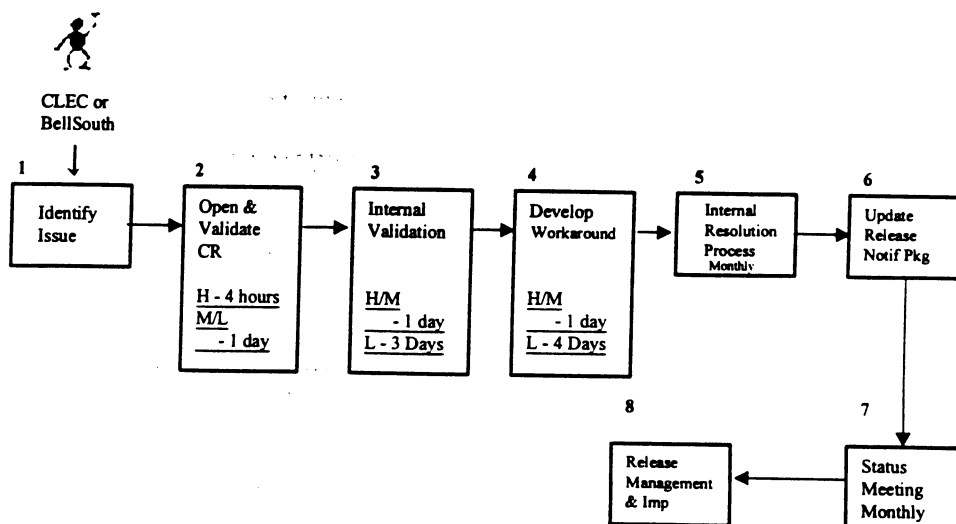
- **Low Impact**

The failure causes inconvenience or annoyance.

Defect Changes identified as High Impact are referred to as **Emergency Changes**. CLECs encountering High Impact defects outside normal business hours (7am – 6pm Eastern) will submit their requests to the Electronic Communications Support (ECS) Group. The ECS Helpdesk number is 888-462-8030.

DRAFT

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect/Emergency Change/Expedite.



Note: ~~Step 4 (Develop Workaround)~~ does not apply for High Impact Expedites.

[NOTE: The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.]

Figure 5-1. Type 6 Process Flow

DRAFT

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects/expedites, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	IDENTIFY NEED 1-2. Identify Defect/Expedite. 2-5. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3-6. Include description of business need and details of business impact. 4-7. Attach related requirements and specification documents. These attachments should include the following, if available: <ul style="list-style-type: none"> • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or APL version (if applicable) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	INPUTS: <ul style="list-style-type: none"> • Type 6 Change Request OUTPUTS: <ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary) 	N/A
2	BCCM	OPEN & VALIDATE DEFECT/EXPEDITE FORM FOR COMPLETENESS 1. Log Defect/Expedite in Change Request Log. 2-8. Send Acknowledgment Notification via email to initiating CLEC. 2-9. Establish CR status ('N' for New Defect/Expedite).	INPUTS: <ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary) OUTPUTS: <ul style="list-style-type: none"> • New Defect/Expedite • Acknowledgment Notification • Clarification Notification (if 	4 hours for High Impact 1 Bus Day for Medium and Low Impact

DRAFT

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p><u>3-10.</u> BCCM reviews change request for mandatory fields using the Change Request Form Checklist.</p> <p><u>4-11.</u> Verify specifications and related information exists.</p> <p><u>5-12.</u> Send Clarification Notification via email to the originator if needed.</p> <p><u>6-13.</u> Update CR Status to 'PC' for Pending Clarification if clarification is needed.</p> <p>If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.</p>	required)	
3	BCCM	<p>INTERNAL VALIDATION</p> <p><u>1-4.</u> Validate that it is a defect/expedite.</p> <p><u>2-5.</u> Perform internal defect/expedite analysis.</p> <p><u>3-6.</u> Determine status of request:</p> <ul style="list-style-type: none"> • If change already exists or CLEC training issue or training issue forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect/Expedite and indicate appropriate Impact Level. • If request is not validated as a defect and the requesting CLEC does not agree with the response, the CLEC may follow the escalation process to 	<p>INPUTS:</p> <ul style="list-style-type: none"> • New Defect/Expedite <p>OUTPUTS:</p> <ul style="list-style-type: none"> • Validated Defect/Expedite • Defect/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required) 	<p>1 Bus Day for High and Medium Impact</p> <p>3 Bus Days Medium and Low Impact</p>

DRAFT

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p><u>resolve the issue.</u></p> <p>Note: High Impact Expedites will skip Step 4 (Develop Workaround) and be scheduled for the current, next release, or point release, best effort.</p> <ul style="list-style-type: none"> If the process is operating as specified in the baselined requirements and published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s). If issue is re-classified as a standard feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect/expedite process flow and enter Types 2-5 process flow (enter at Step 3). <p>NOTE: See Section 119.0 Terms and Definitions – Defect/Expedite Status for valid status codes and descriptions.</p> <p>Defect/Expedite notification will be provided to CLEC community via e-mail and web posting.</p>		
4	BCCM	<p><u>DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)</u></p> <ol style="list-style-type: none"> Defect workaround identified. Change Request status changed to “W” for workaround identified. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via e-mail and web posting. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. <p>Defect workaround notification will be provided to CLEC community via e-mail</p>	<p>INPUTS:</p> <ul style="list-style-type: none"> Validated Defect Clarification Notification (if required) <p>OUTPUTS:</p> <ul style="list-style-type: none"> Workaround (if applicable) Clarification Notification (if required) Cancellation Notification (if required) E-mail and web posting of workaround 	<p><u>4 Bus Days-1 Bus Day for High and Medium Impact</u></p> <p><u>4 Bus Days for Low Impact</u></p>

DRAFT

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		and web posting. If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.		
5	BCCM	<u>MONTHLY STATUS MEETING</u> 1. Provide status of Defect/Expedite. 2. Solicit CLEC/ BST input. 3. Update Defect/Expedite information as needed.	INPUTS: <input type="checkbox"/> Defects/Expedites Received <input type="checkbox"/> Change Request Log <input type="checkbox"/> Defect/Expedite Analysis <input type="checkbox"/> Workaround (if applicable) OUTPUTS: <input type="checkbox"/> Updated status <input type="checkbox"/> Updated Change Request Log • Meeting minutes	Monthly or when status changes, whichever occurs first.
56	BCCM	<u>INTERNAL RESOLUTION PROCESS</u> 1.3. Schedule and evaluate Defects/Expedites based on capacity and business impacts to the CLECs and BellSouth. 2.4. Provide status updates to the CLEC community via email as the status changes until the defect/expedite is scheduled/implemented. NOTE: Validated defects (High Impact) will be implemented within a 4 – 25 business day range, best effort. Expedites (High Impact) will be implemented in the current, next release, or point release, best effort.	INPUTS: • CLEC/ BST input OUTPUTS: • Defect/Expedites Release Schedule	Monthly or when status changes, whichever occurs first. Validated High and Medium Impact defects will be implemented within a 4 – 10 business day range, best effort. Low Impact defects will be implemented within a 4 – 20 business day range, best effort.

DRAFT

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
67	BCCM	<p><u>UPDATE RELEASE PACKAGE NOTIFICATION</u></p> <p>1.3. Update and distribute release notification package via web.</p> <p>2.4. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".</p> <p>Note: The release notification will be published in a timely manner, based on the release constraints associated with the defect/expedite.</p>	<p>INPUTS:</p> <ul style="list-style-type: none"> Defect/Expedite Feature Information <p>OUTPUTS:</p> <ul style="list-style-type: none"> Updated Release Package Notification Scheduled Change Request 	Based on release constraints for defects/expedites (may be less than 30 days).
7	BCCM	<p><u>MONTHLY STATUS MEETING</u></p> <p>5. Provide status of Defect.</p> <p>6. Solicit CLEC/ BST input.</p> <p>7. Update Defect/Expedite information as needed.</p>	<p>INPUTS:</p> <ul style="list-style-type: none"> Defects/Expedites Received Change Request Log Defect/Expedite Analysis Workaround (if applicable) <p>OUTPUTS:</p> <ul style="list-style-type: none"> Updated status Updated Change Request Log Meeting minutes 	Monthly or when status changes, whichever occurs first.
8	BCCM	<p><u>RELEASE MANAGEMENT AND IMPLEMENTATION</u></p> <p>The following release management activities will pertain to Type 6 changes:</p> <p>1.4. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings.</p> <p>2.5. BellSouth business requirements will be presented to CLECs for expedited features (if applicable). If needed, changes will be incorporated and requirements re-baselined.</p> <p>3.6. Once a defect/expedite is implemented</p>	<p>INPUTS:</p> <ul style="list-style-type: none"> Approved Release Package Notification <p>OUTPUTS:</p> <ul style="list-style-type: none"> Project Release Status Implementation Date Implemented Change Request 	Ongoing

DRAFT

Step	Accountability	<u>Sub-processes</u> Activities	Inputs and Outputs	Cycle Time
		in a release, the status will be changed to "I" for Change Implemented.		

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT AND APPROVAL

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be scheduled to coincide with the published release schedules. For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to coincide with the published release schedules occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's estimate of the size and scope of each Change Request

- Schedule of releases and capacity in each
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish “desired/want” dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- CLECs may choose to vote “no” on change requests that may potentially negatively impact its business. If a majority of CLECs vote “no” on any certain change request, that request will not be implemented.
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- ~~Manual processes and d~~Documentation changes will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- ~~Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached~~
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

Part 4 – Developing and Approving Release Packages

Subsequent to the Change Review Meeting BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held 25 business days later.

- Sizing and sequencing of prioritized change requests will begin be accomplished at the Prioritization Meeting. CLECs may take into account the size and scope when prioritizing items with the top priority items and continue down through the list until the capacity constraints for each future release have been reached.
- BellSouth will develop several variations of release packages to include all of the prioritized requests.
- All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.

During the Release Package Meeting BST will present its proposed release packages. BST and CLECs will then vote on the release package or combination of release packages to be implemented. BST/CLEC consensus will be used to create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes

among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability.

7.08.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth Originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as possible. When a new interface request is submitted, BellSouth will present information on the new interface and hold an open discussion at the next monthly status meeting. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC Community using the timeframes established in Part 4, Section 2. As new interfaces are deployed, they will be added to the scope of this document document as appropriate, based on the use by the CLEC community and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs by submitting a Type 4 change request through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Retirement of Versions

When software versions are retired, BellSouth will notify the CLECs by submitting a Type 4 change request through the Change Control Process. Once a change request to retire a version

of an interface is initiated, BellSouth will present its proposed changes to the CLECs at the next monthly status meeting. BellSouth will make best effort to jointly develop the requirements with the CLECs and will, at a minimum, provide requirements and related software, if applicable, at least six months in advance of putting the new version into production.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.
- For Type 6 High and Medium Impact issues, the escalation process is agreed to allow BellSouth a ~~three~~one-day turnaround to provide a status for each cycle of escalation.
- For Type 6 Low Impact and Type 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three-day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Susan Hart Manager - EC Support Group Interconnection Operations	205-733-5393	1-800-946-4646 PIN 1436470	Susan.K.Hart@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
 - Definition and escalation of item.
 - History of item.
 - Reason for escalation.
 - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held

within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Type 2-5 Changes: Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6, High and Medium Impact Changes: Within 1 business day of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6 Low Impact and Type 2-5 Expedite Changes: Within 3 business days of receipt (2 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Sales Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Linda Tate Director (for Systems Issues) Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7878 404-927-7828	Linda.Tate3@bridge.bellsouth.com Joy.A.Lofton@bridge.bellsouth.com
3rd Level	Doug McDougal Senior Director	404-927-7505	Doug.Mcdougal@bridge.bellsouth.com

	(for Systems Issues) Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	Dee.Freeman2@bridge.bellsouth.com
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Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including escalation within each company to the person with ultimate authority for Change Control operations, and the services of a Joint Investigative Team when appropriate, BellSouth and the impacted CLEC(s) agree as follows:

~~to follow this Dispute Resolution Process. BellSouth and the CLEC shall assemble a Joint Investigative Team, within one week, comprised of subject matter experts. The party prompting the dispute should initiate the formation of the team. The team should be co-chaired by representatives of BellSouth and the CLEC respectively. The investigative team will conduct a root-cause analysis to determine the source of the problem, if one exists, and then develop a plan for remedying it. The parties to the dispute must escalate the issue within each company to the person who has ultimate authority for State operations in an effort to achieve a resolution.~~

~~If the dispute cannot be resolved between the companies after these steps are taken, then either party to the dispute may file a formal complaint with the State PSC through the Director of the Telecommunications section for binding mediation. The Director of the Telecommunications section, or his appointee, shall rule upon the complaint within 30 days of its filing. If either party is then aggrieved, it may file a formal complaint with the State PSC.~~

- Either party to the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, both parties shall participate in good faith.
- Either party may file a formal complaint with the State PSC, requesting resolution of the issue, without necessity for prior mediation.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. Following this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution. The official ballot will detail the change being requested, and the significant arguments presented for and against the change during the review. The ballot will be distributed one week following the Status Meeting. CLEC's and BellSouth will have one week in which to cast their vote. Only ballots transmitted before midnight of the due date will be counted. Implementation of such changes will require a two-thirds affirmative ———vote for approval. All changes will be submitted as a change request and reviewed.

10.0 TESTING ENVIRONMENT

Requests related to the processes of testing an interfaces will be included in the Change Control Process. Changes to BellSouth's testing environments and supporting processes will be submitted through the Change Control Process as a Type 4 or Type 5 request. The requests will follow the guidelines and intervals set forth in the Type 2-5 process flow.

BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.

BellSouth will also provide a pre-release testing environment for TAG and EDI that will be available to CLEC's 30 days prior to the implementation of any new releases. This environment will be a wholly separate, non-production environment for all preordering and ordering interfaces and will mirror the production environment.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, refer to the following BellSouth public Internet sites:

EDI

www.interconnection.bellsouth.com/markets/lec.html

Select "Customer Guides"

Select "Local Exchange Ordering Guides"

Select "BellSouth EDI Specifications – TCIF 9"

Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html

Select "OSS Information Center"

Select "TAG Documentation"

This site is password protected. You should obtain the password from your Account Team representative.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- | | |
|---|------------------------------|
| - Contract Negotiations | - BonaFide Requests (BFR) |
| - Enhanced Billing Options Negotiations | - Production Support |
| - Customer Education | - Collocation |
| - Technical Assistance | - Testing Support |
| - General Problem Resolution | - Project/Order Coordination |
| - Tariff Interpretation | - Rate Quotations |

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing Change Requests and defects/expedites.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
 - ◊ Dependencies relative to other data elements
 - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: BST cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects/expedites or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal

entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- Type 2-5 – Expedited Feature Change. Any Type 2-5 change that either BellSouth or a CLEC submits for exception handling in order to achieve a more rapid implementation.
- Type 6 – CLEC Impacting Defect. Any non-Type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

~~Type 6 – CLEC Impacting Expedite. The ability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.~~

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - ~~• **CT = Training.** Requested change already exists, additional training may be required.~~
- **CRC = Change Review Complete.** Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).

- **D = Request Purge.** Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled.** Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects.

Defect/Expedite Status. The status of a CLEC Impacting Defect/Expedite Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - ☐ **CT = Training.** Requested change already exists, additional training may be required.
- **I = Implemented.** Indicates a Defect/Expedite Change Request has been implemented in a release (Step 6).
- **N = New Defect/Expedite Change Request.** Indicates a Defect/Expedite Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect/Expedite Change Request has been scheduled for a release (Step 6).

- **V = Validated Defect/Expedite.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Emergency Change. Defect Changes identified as High Impact are **emergency changes**.

Exception Change. An exception change request may involve the extension of the normal intervals for the implementation of a Type 2-5 change.

Expedited Feature. An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a lack of programming problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the

Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect/Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.



CHANGE REVIEW PRIORITIZATION RANKING

CATEGORY / INTERFACE	CHANGE REQUEST	TITLE	RANKING
PRE-ORDERING	CR0020	VIEW MULTIPLE CSRs SIMULTANEOUSLY	4
	CR0047	DISPLAY ENHANCED MEMORY CALL ACCESS NUMBER	5
	CR0016	SERVICE INQUIRY ENHANCEMENT FOR SL1, SL2, DS0, DS1 AND ISDN	3
	TAG0812990001	PROVIDE CFA & NC / NCI CODES	2
	TAG0812990003	PARSED CSR	1
ORDERING	CR0014	FOR CHANGE ORDERS, CHANGE VERBIAGE ON LENS SCREEN TO READ "NUMBER OF FEATURES TO ADD/DELETE" vs "NUMBER OF FEATURES TO ADD"	18
	CR0015	ACT OF C - CHANGE BASIC CLASS OF SVC.	15
	CR0031	ABILITY TO CHANGE LISTING ACCOUNT IN LENS	14
	CR0045	CONVERSION AS IS - STRIP NON-RESELLABLE USOCs	16
	CR0085	WEB-BASED LSR	13
	EDI0812990003	411 DROPS	4
	EDI0812990004	CHANGE MAIN ACCOUNT NUMBER	11
	EDI0812990005	HANDLING OF REMAINING SERVICE	9
	EDI0812990007	USE OF LEAN / LEATN FIELDS	12
	EDI1215990001	TN vs RSAG VALIDATION	6
	EDI020900_001	ELECTRONICALLY ORDER ROUTING TO OS / DA	8
	EDI030300_001	EDI TEST ENVIRONMENT	1

CATEGORY / INTERFACE	CHANGE REQUEST	TITLE	RANKING
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TARGETED RELEASES 8.0, 8.1, 9.0 and 10.0 SCOPE

Release 8.0 Target Implementation Date: 11/18/00

Change Request #	Change Request Title-Targeted Features
EDI020900_001	Electronically Order Routing to OS/DA
CR0045	Conversion As Is – Strip Non-Resellable USOCs
CR0015	ACT of C – Change Basic Class of Service
CR0014	For Change Orders, Change Verbiage on LENS Screen to Read “Number of Features to Add/Delete” vs “Number of Features to Add”
OSS99	TAG DID

Release 8.1 Target Implementation Date: 12/09/00

Change Request #	Change Request Title-Targeted Features
EDI030300_001	CLEC Test Environment

Release 9.0 Target Implementation Date: 01/06/01

Change Request #	Change Request Title-Targeted Features
	Number Pooling Mandate – Florida only
CR0030	UNE to UNE Migrations
EDI0812990003	411 Drops
CR0003	RPON Electronic Reject & Flow Through
EDI1215990001	TN vs RSAG Validation

Release 9.0 Target Implementation Date: 01/20/01

Change Request #	Change Request Title-Targeted Features
	Number Pooling Mandate – all other states

TARGETED RELEASES 8.0, 8.1, 9.0 and 10.0 SCOPE

Release 10.0 Target Implementation Date: 05/31/01

Change Request #	Change Request Title-Targeted Features
CR0002	Pre-Order/Order Business Rule Discrepancies
TAG0812990001	Provide CFA & NC/NCI Codes
EDI0812990005	Handling of Remaining Service
EDI0812990004	Change Main Account Number
EDI0812990007	Use of LEAN/LEATN Fields
CR0016	SI Enhancement for SL1, SL2, DS0, DS1 and ISDN
CR0029	Partial Migration of UNE Loops
CR0038	TOS Field on ReqTyp J
CR0040	Order Tracking Request

Notes:

TAG0812990003 – Parsed CSR – jointly begin addressing 10/3/00.

CR0078 – Extended Loops is targeted for implementation late 2001 with other 319 products.

-----Original Message-----

From: Williamson, Jill R, NCAM
Sent: Thursday, September 07, 2000 7:30 PM
To: 'Valerie Cottingham'
Cc: 'Sandra C. Jones'; 'Jan M. Burriss'; 'McDougal, Doug'; 'Lofton, Joy'
Subject: ESCALATION: Impacts Of OSS 9G
Importance: High

Valerie,

This is to escalate on BellSouth's response to my concerns regarding BellSouth's implementation of BellSouth's Business Rules for Local Ordering, Issue 9G and LEO Vol 1, Issue 7R. As I stated in my message to Change Control, BellSouth's unilateral implementation of business rule changes without going through change control or regard to the impacts on CLECs is unacceptable. Once again, BellSouth did not follow the Change Control process. If the changes are implemented as scheduled by BellSouth, orders will be rejected and ultimately, customer's due dates will be missed.

Once again, I am requesting that BellSouth withdraw its business rule changes and place its request through Change Control. Given the short timeframe in which we have to work, I'm requesting your response no later than close of business Monday, September 11.

Sincerely,

Jill Williamson

-----Original Message-----

From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Thursday, September 07, 2000 5:22 PM
To: Williamson, Jill R, NCAM
Cc: Valerie.Cottingham@bridge.bellsouth.com;
Sandra.Jones5@bridge.bellsouth.com; Doug.Mcdougal@bridge.bellsouth.com;
Beverly.Sheltonwilliams@bridge.bellsouth.com
Subject: Impacts Of OSS 9G

Jill,

This is to acknowledge your email regarding the impacts of BBR-LO Issue 9G.

We are currently investigating your concerns. We acknowledge that the documentation defects should have funneled through Change Control, but did not.

We are working diligently to adhere to the process.

The 9G business rules will go into effect 10/2/00. They were posted to the Web on 8/31/00, which provided the CLEC community with at least 30 day advance notice. BellSouth does not plan to withdraw these business rules.

We will follow up with you by no later than Monday, September 11 with additional information.

Please let us know if you have questions or wish to discuss.

Thanks,

Change Control Team

-----Original Message-----

From: Valerie.Cottingham@bridge.bellsouth.com
[mailto:Valerie.Cottingham@bridge.bellsouth.com]
Sent: Friday, September 08, 2000 3:45 PM
To: Williamson, Jill R, NCAM
Cc: Jan.Burriss1@bridge.bellsouth.com;
Terrie.Hudson@bridge.bellsouth.com; Sandra.Jones5@bridge.bellsouth.com;
Joy.A.Lofton@bridge.bellsouth.com; Doug.Mcdougal@bridge.bellsouth.com
Subject: ESCALATION: Impacts Of OSS 9G
Importance: High

Jill,

I am acknowledging receipt of your escalation re: Impacts of OSS 9G.

In response to your escalation, BellSouth acknowledges that changes to the Business Rules for Local Ordering, Issue 9G, did not come through Change Control, when they should have. We have addressed this issue internally in an effort to prevent it from occurring again.

BellSouth does not plan to withdraw Issue 9G business rules. We are very concerned about any impacts to the CLECs and therefore, provided the business rules a minimum of 30 days in advance.

We are currently investigating the specific items that you listed in your note to Change Control on yesterday. I expect to have a response for each of these items by Tuesday, 9/12, morning.

You also mentioned Leo Vol 1, Issue 7R. A Carrier Notification letter was posted to the Web. Change Control emailed a courtesy copy of the letter to the CLEC participants. We are currently investigating the changes that were made to this guide to see if business rules changes were made. Clarification issues do not flow through Change Control (i.e. business rule does not change, only made clearer).

I have already discussed this escalation with Joy Lofton.

Please let me know if you have additional concerns or would like to discuss.

Sincerely,

Valerie M. Cottingham



Change Request Form

Complete and email this form to Change.Control@bridge.bellsouth.com or Fax to BellSouth Interconnection Services at

205-321-5160. Please note that line-by-line instruction is attached for completion of this form.

Internal Reference # _____ (1) Date Change Request Submitted 10/_3/_00 (2)

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

☒ TYPE 6 (DEFECT/EXPEDITE) OCN _7125_ (3A)

Company Name ___AT&T_____ (4)

CCM ___Jill Williamson_____ (5) Phone _404-810-8562_____ (6)

CCM Email Address _jrwilliamson@att.com_____ (7) Fax _404-810-8605_____ (8)

Alternate CCM _ _____ (9) Alt Phone # _____ (10)

Originator's Name _Jill Williamson_____ (11) Phone _404-810-8562_____ (12)

Title of Change ___Release 7.1 Caused Defects_____ (13)

Category ☐ Add New Functionality ☐ Change Existing (14) Desired Due Date _10/_4/_00_ (15)

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

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

Interfaces Impacted (18)

<input type="checkbox"/> Pre-Ordering <input type="checkbox"/> LENS <input type="checkbox"/> TAG <input type="checkbox"/> CSOTS	<input checked="" type="checkbox"/> Ordering <input checked="" type="checkbox"/> EDI <input checked="" type="checkbox"/> LNP <input type="checkbox"/> LENS <input type="checkbox"/> TAG	<input type="checkbox"/> Maintenance <input type="checkbox"/> TAFI <input type="checkbox"/> EC-TA Local	<input type="checkbox"/> Manual
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Type Of Change - Check one or more, as applicable (19)

<input type="checkbox"/> Software <input type="checkbox"/> Product & Services <input type="checkbox"/> Documentation	<input type="checkbox"/> Hardware <input type="checkbox"/> New or Revised Edits <input type="checkbox"/> Regulatory	<input type="checkbox"/> Industry Standards <input type="checkbox"/> Process <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Defect/Expedite
--	---	---	---

- Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20) _AT&T began receiving invalid fatal rejects on orders sent to BellSouth on Monday, October 2. It appears that these rejects are as a result of BellSouth's implementation of Release 7.1. The reject messages are R1640 – No original LSR found for this Sup; R1170 – CHC required when REQ TYP is A or B and DFDT is populated; S3530 – LOCNUM-000 LNUM-00001 TELNO=NPT required with this REQ TYP LNA type combination. An example PON is ZXMIAB0000876.

Attachment A-1

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

Docket No. 000731-TP
JMB-13
Page 1 of 9



Change Request Form

Known dependencies (21)

Additional Information ☐ Yes ☐ No (22)

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

This Section to be completed by BCCM only.

Change Request Log # CR0188 (23)

Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25)

Clarification Response Due ___/___/___ (26)

Status ___/___/___ (27)

Change Request Review Date ___/___/___ (28)

Target Implementation Date 10/06/00 (29)

Last Modified By BCCM (30)

Date Modified 10/05/00 (31)

Change Review Meeting Results (32)**Canceled Change Request** ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

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

Request Appeal ☐ Yes ☐ No (35)**Appeal Considerations (36)**

Agreed Release Date ___/___/___ (37)

CMVC # (38)

DDTS# (39)

Attachment A-1

Jointly Developed by the Change Control Sub-team comprised
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JMB-13
Page 2 of 9



Change Request Form

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

Defect/Expedite Validation Results: (40)

10/05/2000

This issue has been validated as a DEFECT, where the "NPT" value was populated on the wrong field. The defect has been corrected and is currently being tested.

The fix is targeted for production on 10/6/00.

Clarification Needed

☐ Yes

☒ No

☒ Defect

☐ Expedite

☐ Feature

☐ Training Issue

☐ Duplicate

☐ Cancel

Defect/Expedite Impacts Other CLECs? ☐ Yes ☐ No

Interfaces Impacted by defect/expedite: ☒ EDI

☐ TAG

☒ LNP

☐ LENS

☐ TCIF 7

☐ TCIF 9

Target Implementation Date:

10/06/00



Change Request Form

Docket No. 000731-TP
JMB-13
Page 4 of 9

Attachment A-4A

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of BellSouth and CLEC Representatives.



Change Request Form

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

Internal Reference # _____ (1) Date Change Request Submitted 09/14/00 (2)

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

☒ TYPE 6 (DEFECT/EXPEDITE) OCN _____ (3A)

Company Name BellSouth (4)

CCM _____ (5) Phone _____ (6)

CCM Email Address _____ (7) Fax _____ (8)

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

Originator's Name _____ (11) Phone _____ (12)

Title of Change **Documentation Defects in the BellSouth Business Rules for Local Ordering – 9G** (13)

Category ☐ Add New Functionality ☒ Change Existing (14) Desired Due Date _____ (15)

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

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

Interfaces Impacted (18)

<input type="checkbox"/> Pre-Ordering <input type="checkbox"/> LENS <input type="checkbox"/> TAG <input type="checkbox"/> CSOTS	<input type="checkbox"/> Ordering <input type="checkbox"/> EDI <input type="checkbox"/> LNP <input type="checkbox"/> LENS <input type="checkbox"/> TAG	<input type="checkbox"/> Maintenance <input type="checkbox"/> TAFI <input type="checkbox"/> EC-TA Local	<input type="checkbox"/> Manual
--	---	---	---------------------------------

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

<input type="checkbox"/> Software <input type="checkbox"/> Product & Services <input checked="" type="checkbox"/> Documentation	<input type="checkbox"/> Hardware <input checked="" type="checkbox"/> New or Revised Edits <input type="checkbox"/> Regulatory	<input type="checkbox"/> Industry Standards <input type="checkbox"/> Process <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Defect/Expedite
---	--	---	---

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

BellSouth has identified the following documentation defects in the BellSouth Business Rules for Local Ordering – Version 9G:

1. **LSR Form-CIC Field** – The CIC field only appears on the LSR form. It is not present on the EU form in the document. There is an error in the "Summary of Changes" that shows the CIC field on the EU form.
2. **LOCNUM** – LOCNUM does not appear on the EU form. It is on the DL/DCSR form and no change was made in the business rules. There is an error in the "Summary of Changes".
3. **DL Form LACT Field** – The "LACT" field does appear in the Listing Control Section, not the Administrative section of the DL form. There is an error in the "Summary of Changes".

Attachment A-1



Change Request Form

4. **DL Form – ADI Field – PASN** – "PASN" should state "LASN" in the first conditional usage note. BST has added a conditional usage note and a business rule for this field.
5. **DL Form – LAST field** – The business rule referenced in the "Summary of Changes" applies. (Prohibited with cross references).
6. **DL Form – YPH Field** – The example does not follow the field specification. It should be six numerics.
7. **LSR Form REQ TYP M-LSO and CIC Fields** – LSO and CIC fields were changed from required to conditional, however the business rules do not state under what conditions the fields are required.

Known dependencies (21)

Additional Information ☐ Yes ☐ No (22)

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

Docket No. 000731-TP
JMB-13
Page 6 of 9

Attachment A-1



Change Request Form

This Section to be completed by BCCM only.

Change Request Log # CR0159 (23)

Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25)

Clarification Response Due ____/____/____ (26)

Status S (27)

Change Request Review Date __/__/__(28)

Target Implementation Date 09/28/00 (29)

Last Modified By _____ (30)

Date Modified ____/____/____ (31)

Change Review Meeting Results (32)

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

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

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

Agreed Release Date ___/___/___ (37)

CMVC # _____ (38)

DDTS# (39)

Docket No. 000731-TP

JMB-13

- Page 7 of 9

Attachment A-1

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



Change Request Form

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

Defect/Expedite Validation Results: (40)

These discrepancies have been identified and will be corrected in the updated BellSouth Business Rules for Local Ordering, Version 9H which is targeted for Sept. 28, 2000.

Clarification Needed ☐ Yes ☒ No

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

Defect/Expedite Impacts Other CLECs? ☒ Yes ☐ No

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

Target Implementation Date: 09/28/00

Docket No. 000731-TP
JMB-13
Page 8 of 9

Attachment A-1



Change Request Form

Docket No. 000731-TP
JMB-13
Page 9 of 9

Attachment A-4A

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Revision-to-Issue Cross-Reference

AT&T Red Line CCPV2 Page Number	Associated Arbitration Sub-Issue / Concern
7	d
8	k
11-12	c
18	l
21	g
22	h
23	h & m
24	m
25	n
26	h & n
27	n
28-29	h
30-34	c
35-43	e & f
44-47	n
48-49	a & b
50, 53	j
55	i
56	o
57	k
61	c & m
63	m
64	c, e & f

Sub-Issues

- a) Introduction of new interfaces;
- b) Retirement of existing interfaces;
- c) Exceptions to the process;
- d) Documentation, including training;
- e) Defect correction;
- f) Emergency changes;
- g) An eight step cycle, repeated monthly;
- h) A firm schedule for notifications associated with changes initiated by BellSouth;
- i) A process for dispute resolution including referral to state utility commissions or courts;
- j) A process for escalation of changes in process.

Other Concerns

- k) Testing support and testing environment
- l) Provision of a trouble number for Type 1 events
- m) Ability of BellSouth to unilaterally cancel or reject CLEC requests
- n) Change Review – Prioritization - Release Package Development and Approval
- o) The process of changing the process

-----Original Message-----

> From: Williamson, Jill R, NCAM
> Sent: Monday, July 24, 2000 10:23 AM
> To: 'Change.Control@bridge.bellsouth.com'
> Cc: 'Annette.Cook@espire.net'; 'sharon.arnett@mail.sprint.com';
> 'bszafran@covad.com'; 'Tyra.Colbert@wcom.com';
> 'sandra.k.evans@mail.sprint.com'; 'jnovo@mpowercom.com';
> 'Katherine.Hudler@espire.net'; 'kschwart@covad.com';
> 'lchase@covad.com';
> 'mubeen@nightfire.com'; 'prehm@nightfire.com'; 'smurray@rhythms.net';
> 'tyra.colbert@wcom.com'; 'Yvette.Brown@espire.net'; 'Judy Novo'
> Subject: CLEC input on the Change Control Process
> Importance: High
>
> Change Control Team,
>
> We held a meeting last Thursday to discuss our concerns with the
Interim Change Control Process (I-CCP) and would like to share those
concerns with you prior to our status meeting on Wednesday. Our
expectation is that BellSouth will come to the meeting prepared to
address these issues and will bring the appropriate decision
makers/SMEs to the meeting.
>
> The main issues that must be addressed include:
>
> * Defect/Expedited Feature Process - This piece of the process
> continues to be a big concern for us. We must have severity levels
and associated response time for requests we consider to be urgent or
outside a new functionality request. We propose you change the title
of Type 6 requests so that it represents requests that the CLECs would
consider defects or emergency changes, i.e., what BellSouth includes in
defects and the expedited feature process. Within this category, there
should be three levels of priority, representing varying levels of
impact to the CLECs. Each level of priority would have corresponding
response times, again based on the level of severity.
>
> * Documentation "Defects" - Missing or incorrect documentation
should go through the Type 6 category and should be prioritized based
on the degree of discrepancy and/or impacts to the CLECs ability to do
business with BellSouth. Also, when a documentation defect is
identified by either BellSouth or a CLEC, BellSouth should immediately
send a notification to the CLECs advising them of the discrepancy.
>
> * Rejected Change Requests - Requests that are rejected by
BellSouth remain in the "new" status and under the current process
never get addressed. We need to modify the process so that requests
BellSouth cannot or is unwilling to support are addressed. When
BellSouth rejects a request, a conference call should be scheduled with
the CLECs and BellSouth's SMEs (could be our monthly meeting) to
present the issue, discuss BellSouth's reason for rejecting the request
and to develop options for resolving the issue.
>
> * SME/Decision Maker Participation - BellSouth must ensure that the
> appropriate SMEs or decision makers are present at all Change Control
> meetings to address issues with and provide expertise to the CLECs.
>

> * In addition to the rules around documentation releases, we need to add guidelines for system impacting releases. These guidelines will vary depending on the size of the release, but we should create a couple of categories. For example, when BellSouth implements a point release, BellSouth should provide documentation at least 60 days in advance and allow for testing up to 30 days in advance of the release. Also, anytime BellSouth plans to update CLEC documentation, the Change Control Team should be given advance notice of the update and detail of the changes.

>

> * The language around Retirement of Interfaces needs to be slightly modified. While we agree that the Retirement of Interfaces does not need to go through the voting/prioritization process, notification of the retirement should go through Change Control.

>

> Steve Murray	Tyra Colbert-Hush	Steve Brown
> Rhythms	WCOM	Covad

>

> Jill Williamson	Mubeen Saifullah	Sandy Evans
> AT&T	Peggy Rehm	Sprint
>	Nightfire	

>

> Yvette Brown	Judy Novo
> espire Communications	Mpower Communications

>



Change Control Process Monthly Status Meeting Minutes

DATE: July 26, 2000

MEETING: Monthly Status Call

PURPOSE: Review Status of Pending/Approved Change Requests

ATTENDEES

Tyra Colbert, WorldCom	Steve Murray, Rhythms	Valerie Cottingham, BST
Sandy Evans, Sprint	Brian Rutter, KPMG	James Hunter, KPMG
Annette Cook, e.spire	Steve Hancock, BST	Shamone Stapler, ITC-DeltaCom
Linda Tate - BST	Cheryl Storey, BST	Jill Williamson, AT&T
Carol Harrison, Impower	Carl Vincent, FL PSC	Kevin McAllorum, AT&T
Peggy Rehm, Nightfire	John Duffey, FL PSC	Mubeen Saifullah, Nightfire
Brenda Files, BST	Paul Winehart, e.spire	Phyllis Burt, Quintessent
Woody Roe, Albion Connect	Yvette Brown, e.spire	Mickey Dossey, Quintessent
Lorraine Watson - WorldCom	Kim Gillette - Quintessent	Donna Graham, Mantiss
		Rick Woodhouse, KPMG

AGENDA

- Agenda Review status of pending/approved Change Requests (including defects), review current Release Management statuses and discuss Interim Change Control Process.

Docket No. 000731-TP
JMB-16
Page 1 of 2

4) Owner: BellSouth (OPEN)

CR0040-Order Tracking Request. Provide additional information on LNP limitations.

Status: Non-LNP tracking information will be real time. LNP information will be non-real time. Currently the LNP architecture is not designed to accommodate real time queries regarding the status of a service order and the location of an LSR with respect to the hand-off between systems. We are currently making architecture changes to the LNP system, which in time may allow a real time query to occur. AT&T (Jill) submitted additional questions on 7-24, which are currently being addressed by BST. Responses to these questions should provide clarification regarding the LNP issue.

5) Owner: BellSouth (CLOSED)

CR0002-Pre-order/Order Field Discrepancies-CLEC concerns on the handling of this request.

Status: The Release Management Team was made aware of CLEC concerns with the field discrepancies and advised this effort is being reviewed for upcoming releases. The work effort around this feature is large due to the number of fields affected. Additional information should be available at our August Release Package Meeting.

6) Owner: BellSouth (CLOSED)

Check on status of Sprint's document addressing discrepancies in the BellSouth Business Rules-Local Ordering Guide.

Status: Response has been provided to Sprint addressing discrepancies.

7) Owner: BellSouth (OPEN)

Determine if BST could provide draft documentation to CLECs prior to release.

Status: CLECs were advised that BellSouth couldn't provide draft documentation prior to releases.

8) Owner: BellSouth (OPEN)

EDI0812990003 - CLECs requested better understanding of why 411 drops are occurring.

Status: If a CLEC's end user listing is dropped from Directory Assistance, the CLEC should call the LCSC. If BellSouth is at fault, no additional LSR is required from the CLEC. The listing is corrected as soon as possible. If a CLEC error is the cause, an LSR is required.

Jill (AT&T) questioned if a list could be submitted to the LCSC in lieu of calling. Change Control will address internally and provide response. Jill advised she would like to leave this request in "Pending" status. Change Control will continue discussion with Jill regarding this issue.

9) Owner: BellSouth (OPEN)

Determine how high priority CRs that have not been scheduled will be handled.

Status: It was suggested that high priority CRs that have not been scheduled be ranked two (2) times before trying to get implemented.

**New Change
Requests
(Types 2-5)**

ORD030200_001 - UNE via ASR21

Status: See Action Items. Jill (AT&T) and Tyra (WorldCom) will advise Change Control how they would like to pursue with this request.

ORD032700_001 - Post-FOC Clarification

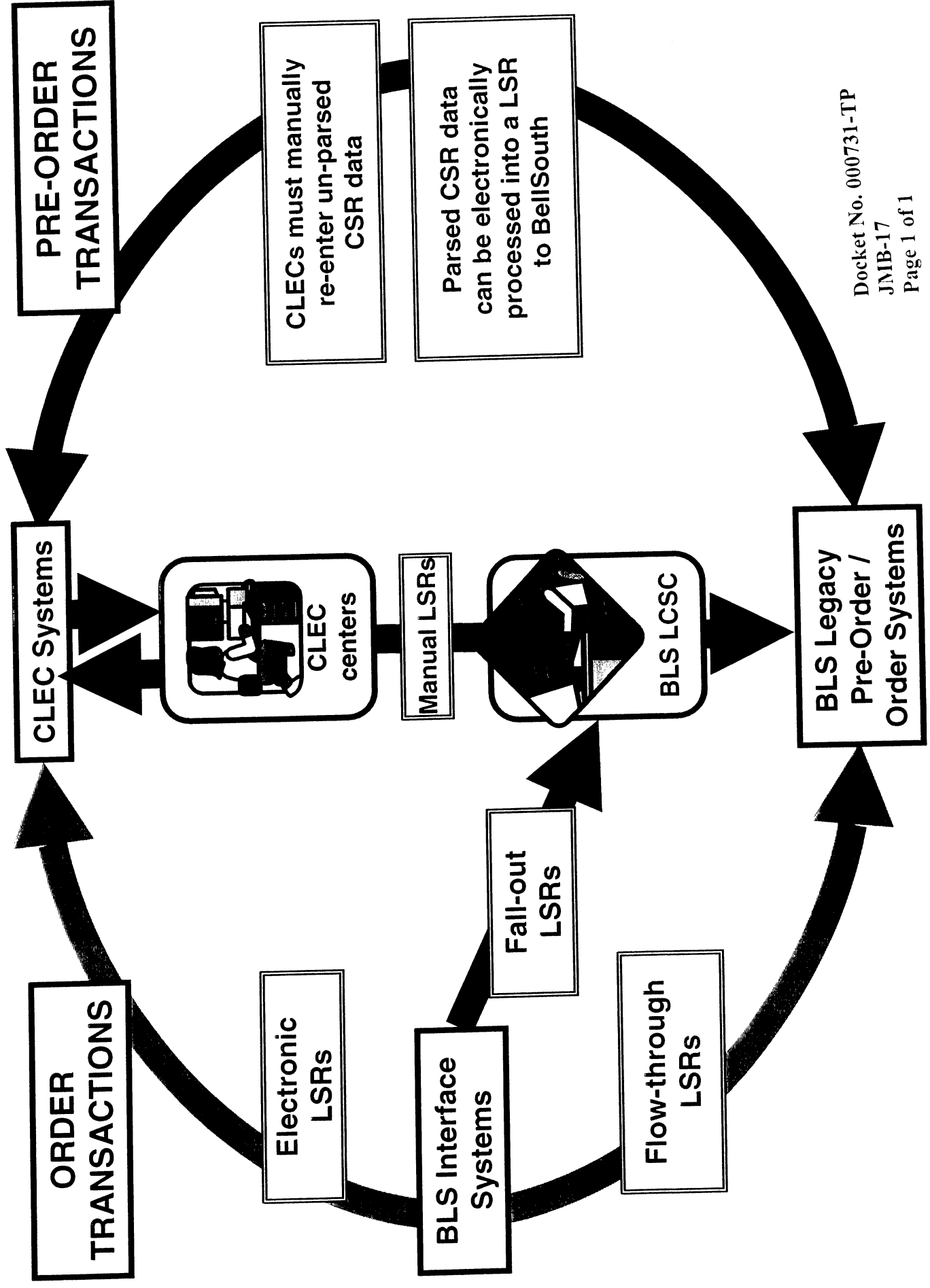
Status: Conference call to be scheduled in August to discuss further.

Docket No. 000731-TP

JMB-16

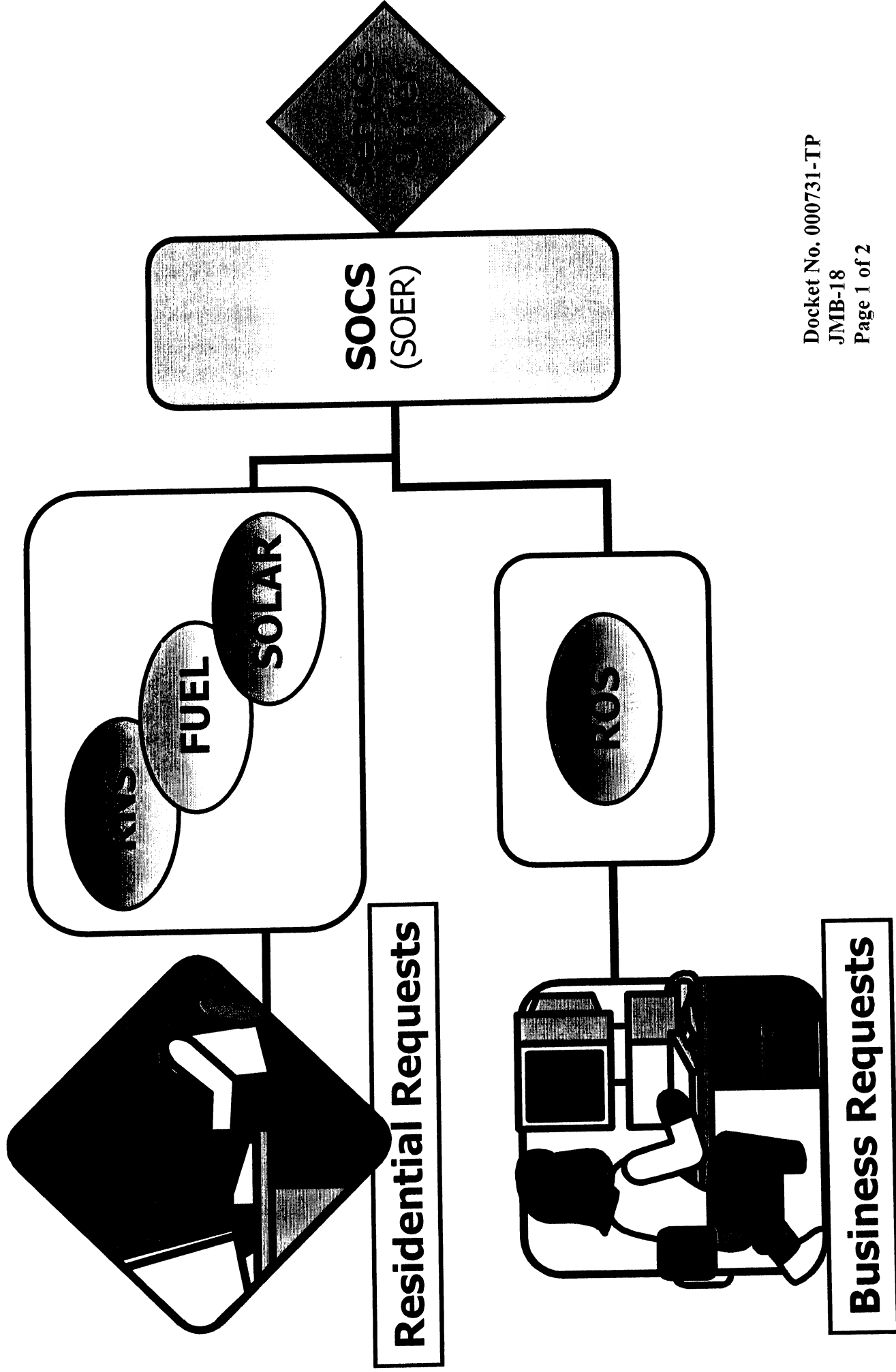
Page 2 of 2

Equivalent ordering functionality

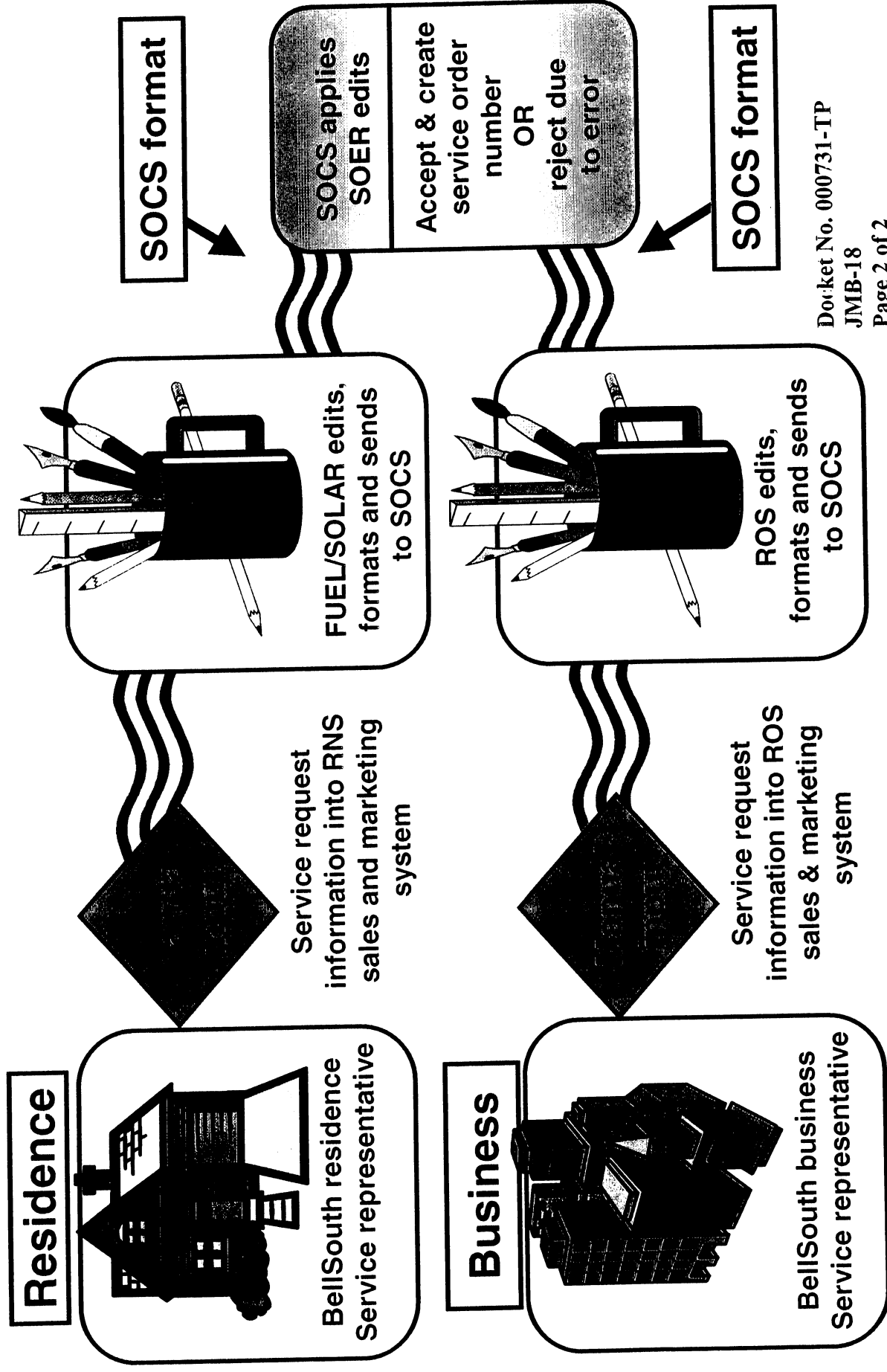


BellSouth ordering methodology

All BellSouth service requests are capable of flow-through



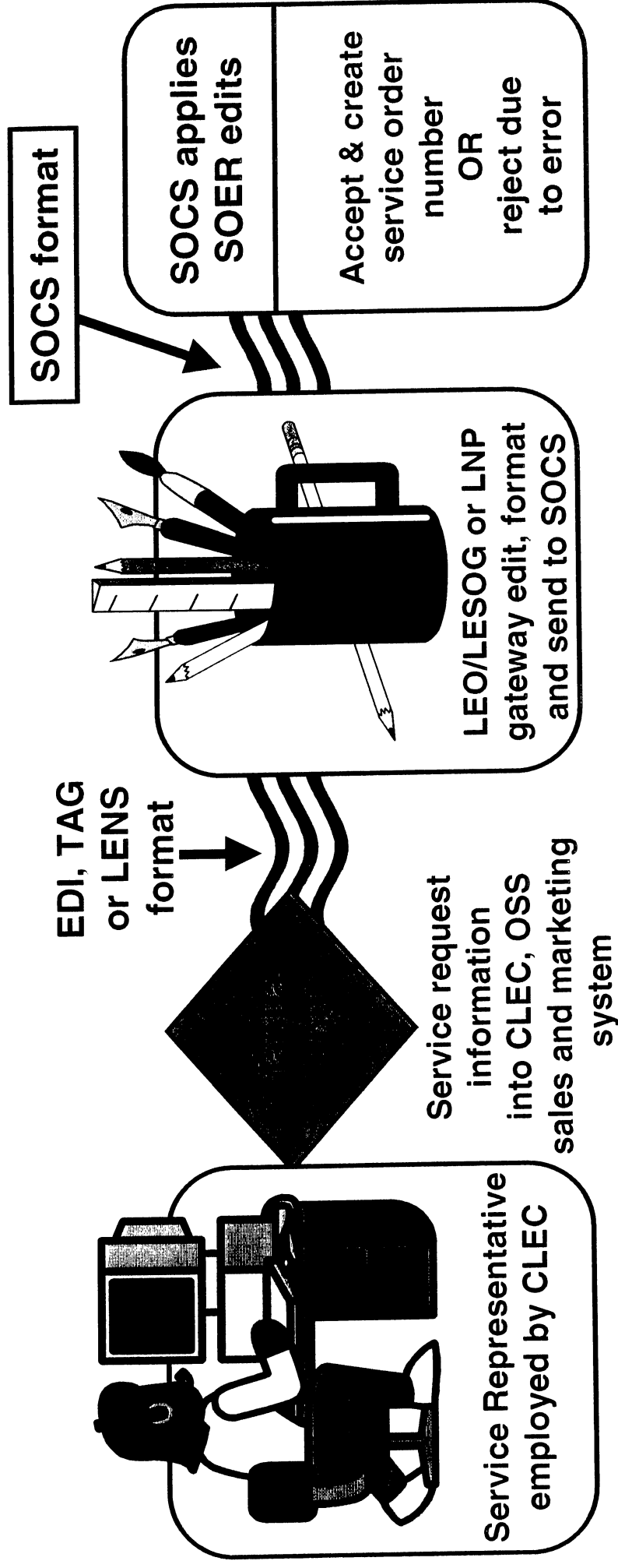
How BellSouth service requests become service orders



Docket No. 000731-TP
JMB-18
Page 2 of 2

Service orders for BLS do not exist until acceptance by SOCS

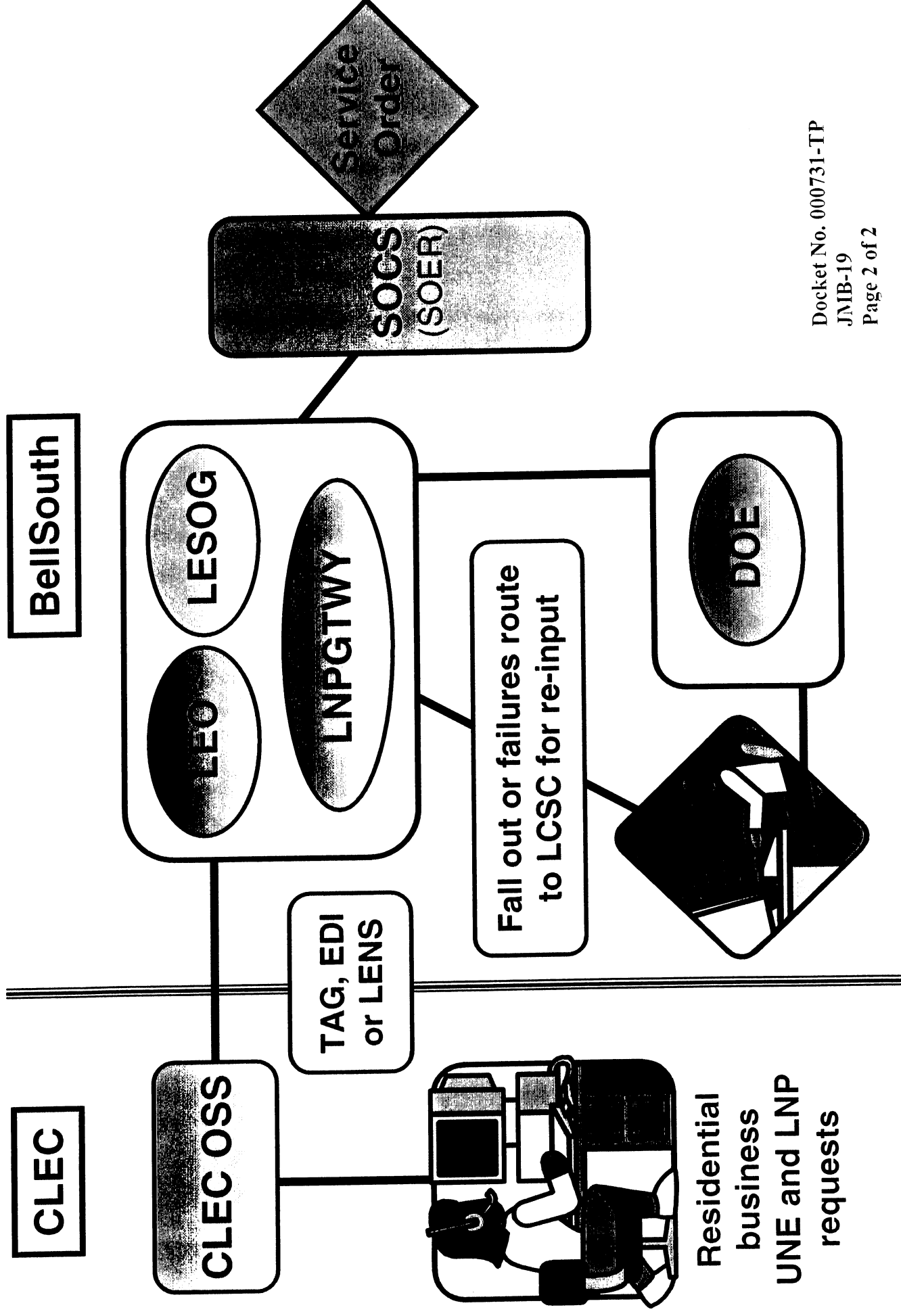
How CLEC service requests become service orders



Service orders for CLECs do not exist until acceptance by SOCS

CLEC ordering methodology

Only some CLP service requests are capable of flow-through



LNP FLOW-THROUGH DATA

	May-TAG	May-EDI	Jun-TAG	Jun-EDI	Jul-TAG	Jul-EDI	Aug-TAG	Aug-EDI	Sep-TAG	Sep-EDI
Total Mech LSRs	1206	5263	2509	6688	2015	6025	1646	9153	441	13285
Manual Fail Out	734	2093	1124	2795	1051	2286	720	2991	258	3436
Validated LSRs	382	3071	1289	3652	915	3554	894	5552	171	9355
BellSouth Caused System Failure	122	1437	247	1608	177	1484	334	2768	157	5247
Flow Through Issued SOs	130	1152	654	1657	452	1666	376	2249	3	3507
% Manual Failout - LSRs	61%	40%	45%	42%	52%	38%	44%	33%	59%	26%
% BellSouth System Failure - LSRs	10%	27%	10%	24%	9%	25%	20%	30%	36%	39%
% BellSouth System Failure - VLSRs	32%	47%	19%	44%	19%	42%	37%	50%	92%	56%
% Total BellSouth Failout + Failure - LSRs	71%	67%	55%	66%	61%	63%	64%	63%	94%	65%
% Maximum One-Touch CLP Orders	29%	33%	45%	33%	39%	37%	36%	37%	6%	35%

Docket No. 000731-TP
JMB-20
Page 1 of 4

UNE FLOW-THROUGH DATA

	Apr-EDI	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI
Total Mech LSRs	1045	2219	15053	1901	2082	45123	2630	5421	36221	1988	7958	36853	3085	7879	28781	1423
Manual Fail Out	315	370	2794	702	491	6676	695	973	7080	808	1538	5728	1059	1824	6071	1091
Validated LSRs	620	1703	10024	895	1302	33651	1637	3282	23855	962	4597	25974	1767	5130	18784	128
BellSouth Caused System Failure	234	475	1882	430	469	6872	635	1150	5070	373	1796	6206	191	1718	4099	76
Flow Through Issued SOs	322	828	6838	265	578	24121	894	1799	15176	524	2355	17968	1525	3130	13661	27
% Manual Failout - LSRs	30%	17%	19%	37%	24%	15%	26%	18%	20%	41%	19%	16%	34%	23%	21%	77%
% BellSouth System Failure - LSRs	22%	21%	13%	23%	23%	15%	24%	21%	14%	19%	23%	17%	6%	22%	14%	5%
% BellSouth System Failure - VLSRs	38%	28%	19%	48%	36%	20%	39%	35%	21%	39%	39%	24%	11%	33%	22%	59%
% Total BellSouth Failout + Failure - LSRs	53%	38%	31%	60%	46%	30%	51%	39%	34%	59%	42%	32%	41%	45%	35%	82%
% Maximum One-Touch CLP Orders	57%	62%	69%	40%	54%	70%	49%	61%	66%	41%	58%	68%	59%	55%	65%	18%

Docket No. 000731-TP
JMB-20
Page 2 of 4

BUSINESS FLOW-THROUGH DATA

	Mar - EDI	Apr-LENS	Apr-TAG	Apr-EDI	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI
Total Mech LSRs	1691				6524	2015	1360	6739	2427	1250	6702	2224	1079	10438	1182	1619	9168	1056	1221
Manual Fall Out	1025				1367	1055	799	1175	1343	764	1312	1105	658	2059	476	970	2207	442	727
Validated LSRs	579				4304	756	446	4460	725	403	4447	861	328	6762	539	539	5725	463	403
BellSouth Caused System Failure	241				1409	220	185	1413	225	134	1331	169	141	2552	164	224	2199	138	122
Flow Through Issued SOs	275				2424	413	214	2647	398	241	2747	422	147	3605	312	256	3171	299	240
% Manual Fallout - LSRs	61%	#DIV/0!	#DIV/0!	#DIV/0!	21%	52%	59%	17%	55%	61%	20%	50%	61%	20%	40%	60%	24%	42%	60%
% BellSouth System Failure - LSRs	14%	#DIV/0!	#DIV/0!	#DIV/0!	22%	11%	14%	21%	9%	11%	20%	8%	13%	24%	14%	14%	24%	13%	10%
% BellSouth System Failure - VLSRs	42%	#DIV/0!	#DIV/0!	#DIV/0!	33%	29%	41%	32%	31%	33%	30%	20%	43%	38%	30%	42%	38%	30%	30%
% Total BellSouth Fallout + Failure - LSRs	75%	#DIV/0!	#DIV/0!	#DIV/0!	43%	63%	72%	38%	65%	72%	39%	57%	74%	44%	54%	74%	48%	55%	70%
% Maximum One-Touch CLP Orders	25%				57%	37%	28%	62%	35%	28%	61%	43%	26%	56%	47%	26%	52%	45%	30%

Docket No. 000731-TP
JMB-20
Page 3 of 4

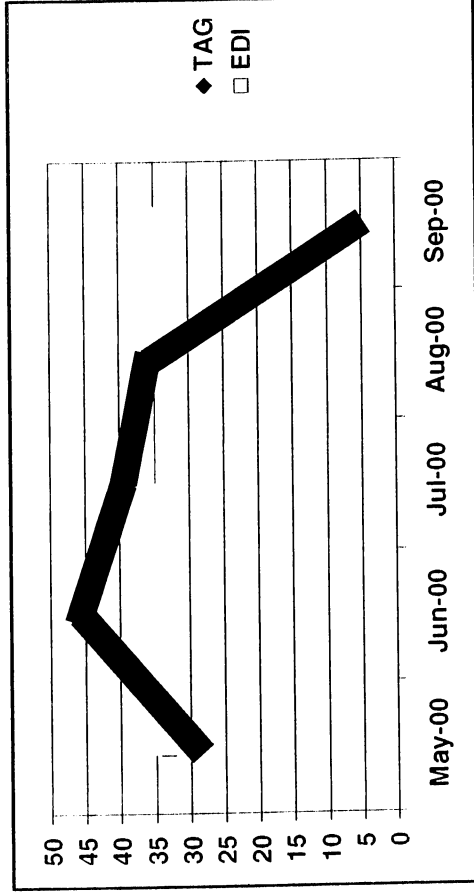
RESIDENCE FLOW-THROUGH DATA

	Mar - EDI	Apr-LENS	Apr-TAG	Apr-EDI	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI
Total Mech LSRs	4751	114499	36464	2140	139160	58350	3076	145667	61459	3992	136989	57961	4520	165707	57865	7036	151901	47810	7142
Manual Fail Out	527	5787	787	286	7806	1366	230	9704	1959	284	8162	1537	449	13833	4062	442	11595	1488	365
Validated LSRs	3626	99166	33679	1610	121868	54592	2535	125300	56223	3233	118230	52030	3624	135162	49185	5445	126148	42279	5643
BellSouth Caused System Failure	447	7158	1686	341	9170	2235	582	9238	2352	801	7965	1799	798	13818	2042	1772	11242	1522	2121
Flow Through Issued SOs	3034	89432	31287	1208	110029	51353	1817	113640	52909	2223	108205	49208	2578	119378	46469	3261	113417	40432	2986
% Manual Failout - LSRs	11%	5%	2%	13%	6%	2%	7%	7%	3%	7%	6%	3%	10%	8%	7%	6%	8%	3%	5%
% BellSouth System Failure - LSRs	9%	6%	5%	16%	7%	4%	19%	6%	4%	20%	6%	3%	18%	8%	4%	25%	7%	3%	30%
% BellSouth System Failure - VLSRs	12%	7%	5%	21%	8%	4%	23%	7%	4%	25%	7%	3%	22%	10%	4%	33%	9%	4%	38%
% Total BellSouth Failout + Failure - LSRs	21%	11%	7%	29%	12%	6%	26%	13%	7%	27%	12%	6%	28%	17%	11%	31%	15%	6%	35%
% Maximum One-Touch CLP Orders	79%	89%	93%	71%	88%	94%	74%	87%	93%	73%	88%	94%	72%	83%	89%	69%	85%	94%	65%

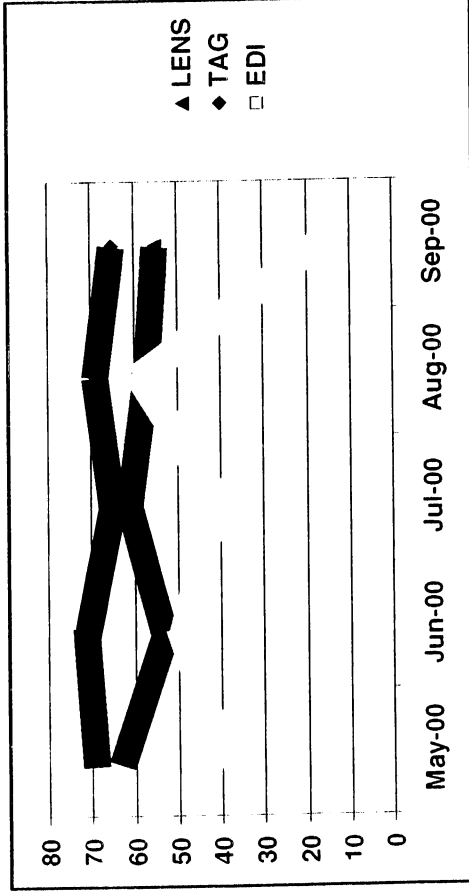
Docket No. 000731-TP
JMB-20
Page 4 of 4

Percent maximum one-touch CLEC orders

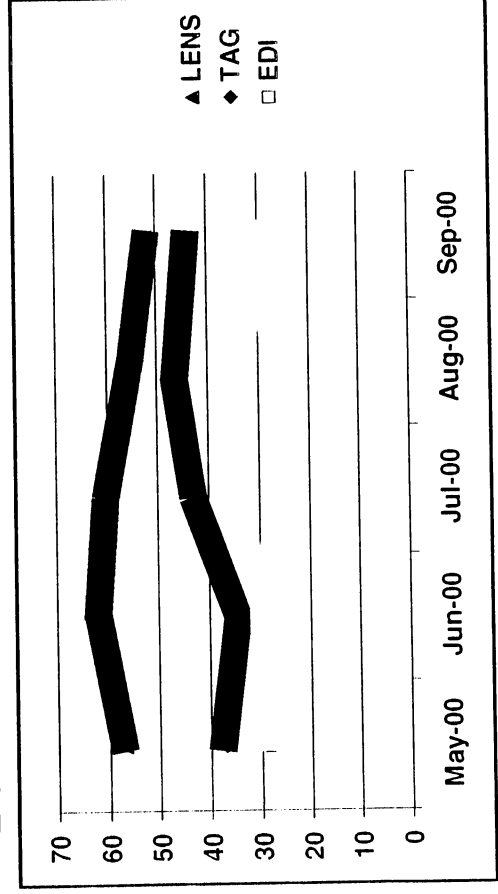
LNP – benchmark 85%



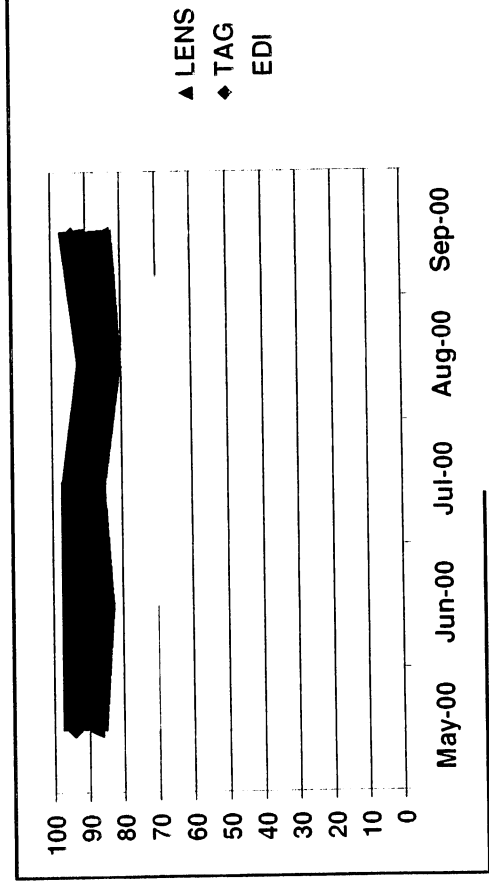
UNE – benchmark 85%



Business resale – benchmark 90%



Residence resale – benchmark 95%



Percent maximum one-touch CLEC orders

Type	Interface/ product	May 2000	June 2000	July 2000	August 2000	September 2000
LNP Benchmark 85%	LENS	NA	NA	NA	NA	NA
	TAG	29	45	39	36	6
	EDI	33	33	37	37	35
UNE Benchmark 85%	LENS	62	54	61	58	55
	TAG	69	70	66	68	65
	EDI	40	49	41	59	18
Business resale Benchmark 90%	LENS	57	62	61	56	52
	TAG	37	35	43	47	45
	EDI	28	28	26	26	30
Residence resale Benchmark 95%	LENS	88	87	88	83	85
	TAG	94	93	94	89	94
	EDI	74	73	72	69	65

Flow-Through Measure Results Comparison

CLEC Aggregate Data / AT&T Data – Percent of Total Mechanized LSRs

Product	LPN	UNE	Business	Residence
Measure / Month	CLEC/ AT&T	CLEC/ AT&T	CLEC/ AT&T	CLEC/ AT&T
% Designed Manual Fallout				
• May	44 / 67	20 / 62	33 / 0	5 / NA
• June	43 / 74	16 / 60	32 / 30	6 / NA
• July	42 / 81	20 / 49	31 / 59	5 / NA
% BellSouth System Error				
• May	24 / 0	15 / 20	18 / 33	6 / NA
• June	20 / 0	16 / 20	17 / 0	6 / NA
• July	21 / 0	15 / 33	16 / 0	5 / NA
Total % Fallout Caused By BellSouth				
• May	68 / 67	35 / 82	51 / 33	11 / NA
• June	63 / 74	32 / 80	47 / 30	12 / NA
• July	63 / 81	35 / 82	47 / 59	10 / NA
Maximum Possible % Flow-Through				
• May	32 / 33	65 / 18	49 / 67	89 / NA
• June	37 / 19	68 / 20	53 / 70	88 / NA
• July	37 / 19	65 / 18	53 / 41	90 / NA

Flow-Through Measure Results Comparison

Actual Flow-Through Results EDI Interface CLEC Aggregate / AT&T

Product	LPN		UNE		Business		Residence	
Measure/ Interface	CLEC	AT&T	CLEC	AT&T	CLEC	AT&T	CLEC	AT&T
Basic EDI								
• May	22	0	14	1.6	16	44	59	NA
• June	25	0	34	3.1	19	50	56	NA
• July	28	0	26	1.2	14	18	57	NA
Achieved EDI								
• May	25	0	19	2.0	18	57	69	NA
• June	27	0	40	3.7	21	62	67	NA
• July	31	0	31	1.4	16	23	67	NA
Potential EDI								
• May	45	0+	38	8++	54	57+++	76	NA
• June	51	0#	58	13##	64	100## #	74	NA
• July	53	0*	58	3.4**	51	100***	76	NA

+ 67 % Designed Manual Fallout

++ 62 % Designed Manual Fallout, 20% BellSouth System Error

+++ 0 Designed Manual Fallout, 33% BellSouth System Error

74% Designed Manual Fallout

60% Designed Manual Fallout, 20% BellSouth System Error

30% Designed Manual Fallout

* 81% Designed Manual Fallout

** 49% Designed Manual Fallout, 33% BellSouth System Error

*** 59% Designed Manual Fallout

Docket No. 000731-TP

JMB-22

Page 2 of 6

Flow-Through Measure Results Comparison

Basic Flow-Through

- Reflects the actual flow-through that occurs without regard to cause:
 - Goes up and down with CLEC input errors.
 - Goes up and down with requests BellSouth has "designed" to fallout.
 - Goes up and down with failures of BellSouth's system to perform.

Basic Percent Flow-through = (Issued SO's) ÷ (Total Mech LSR's) X 100

BellSouth Achieved Flow-Through

- Reflects flow-through that would occur if CLECs make no input errors.
 - CLEC input errors have no impact on the reported result.
 - Goes up and down with requests BellSouth has "designed" to fallout.
 - Goes up and down with failures of BellSouth's system to perform.
 - The difference between Basic and Achieved Flow-Through reflects the impact of CLEC input errors.
 - The measure itself reflects the operational flow-through performance delivered by BellSouth's interfaces as designed and operating.

**BellSouth Achieved Percent Flow-through = (Issued SO's) ÷
Σ Total Mech LSR's - [(Auto Clarification) + (CLEC Caused Fallout)] X 100**

System Potential Flow-Through

- Reflects flow-through that would occur if CLECs make no input errors and BellSouth eliminates designed fallout.
 - CLEC input errors have no impact on the reported result.
 - BellSouth designed fallout has no impact on the reported result.
 - Goes up and down only with failures of BellSouth's system to perform.
 - The difference between Achieved and System Potential Flow-Through reflects what the performance could be if there were no design deficiencies.
 - The difference between the result reported and 100% reflects the failure of the interfaces to perform as designed.

**System Potential Percent Flow-through = (Issued SO's) ÷ Σ Total Mech LSR's –
[(Manual Fallout) + (Auto Clarification) + (CLEC Caused Fallout)] X 100**

Flow-Through Measure Results Comparison

Aggregated Interface and Product Results

Measure	Jan	Feb	March	April	May	June	July
Basic	82	78	76	74	76	73	70
Achieved	89	86	84	83	84	82	82
Potential	95	93	92	92	91	90	91

Disaggregated Interface - Disaggregated Product Results May 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (76)				
• EDI	22	14	16	59
• TAG	11	45	20	88
• LENS	-	37	37	79
Achieved (84)				
• EDI	25	19	18	69
• TAG	13	59	24	93
• LENS	-	49	47	86
Potential (91)				
• EDI	45	38	54	76
• TAG	52	78	65	96
• LENS	-	64	63	92
Volumes				
• EDI	5,263	1,901	1,360	3,076
• TAG	1,206	15,053	2,015	58,350
• LENS	-	2,219	6,524	139,160
• Total	6,469	19,173	9,899	200,586
LEO Total = 229,658 Good = 197,510 Bad = 32,148 % Bad = 14%				

Flow-Through Measure Results Comparison

Disaggregated Interface - Disaggregated Product Results June 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (73)				
• EDI	25	34	19	56
• TAG	26	53	16	86
• LENS	-	28	39	78
Achieved (82)				
• EDI	27	40	21	67
• TAG	32	64	20	95
• LENS	-	38	51	84
Potential (90)				
• EDI	51	58	64	74
• TAG	73	77	64	96
• LENS	-	55	65	92
Volumes				
• EDI	6,688	2,630	1,250	3,992
• TAG	2,509	45,123	2,427	61,459
• LENS	-	2,083	6,739	145,667
• Total	9,197	49,839	10,416	211,118
LEO Total = 271,373 Good = 207,126 Bad = 64,247 % Bad = 24%				

Flow-Through Measure Results Comparison

Disaggregated Interface - Disaggregated Product Results July 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (70)				
• EDI	28	26	14	57
• TAG	23	42	19	85
• LENS	-	34	41	79
Achieved (82)				
• EDI	31	31	16	67
• TAG	27	56	24	93
• LENS	-	46	51	87
Potential (91)				
• EDI	53	58	51	76
• TAG	72	75	71	96
• LENS	-	61	67	93
Volumes				
• EDI	6,025	1,988	1,079	4,520
• TAG	2,015	36,221	2,224	57,961
• LENS	-	5,241	6,702	136,989
• Total	8,040	43,450	10,005	199,470
LEO Total = 252,925 Good = 194,950 Bad = 57,975 % Bad = 23%				

REPORT NAME: CLEC LSR Information
REPORT PERIOD: 08/01/2000 to 08/30/2000
CLEC: 7125 -

NOTES FOR REPORT ON CLEC LSR INFORMATION

This report contains information on all mechanically submitted, non-LNP LSRs that BellSouth processed for your company during the period noted above. For the purpose of this report, an LSR is a distinct copon/ver combination. The data presented has several lines per LSR and where more than one line is needed to determine the status of an LSR (e.g., an LSR flows through when certain conditions are found/not found on three lines), it's still counted as one LSR. Each different version of a particular PON is considered a separate LSR within BellSouth. Below, you will find explanations for each column and its contents.

CC - Your company code.

PON - Your purchase order number as received on the LSR.

VER - The LSR version.

TIMESTAMP - Timestamp of note or error posting in LEO database.

TYPE - Notes type. See explanations of each type in the next section.

ERR# - ENCORE error number. Please refer to your LEO Implementation Guide for complete explanations of each error number.

NOTE OR ERROR DESCRIPTION - Actual text of the note or error as found in the LEO database.

When comparing the results of this LSR information file with the flow through aggregate report, please note that this LSR information file contains LSR data for all submission types, (LENS, EDI, TAG), but are separated by cc while there's a separate line for each submission type on the aggregate report, the intent of this LSR information file is for the reconciliation for all LSRs submitted regardless of submission type.

NOTES TYPES EXPLAINED

There are several different types of notes, each with its own unique identifier. Many of these are internal to BellSouth, and will not be useful to you. Others will tell you immediately the type of note that you are viewing. For example, a type of 'C280' refers to an internal BellSouth program which generated the note text, and 'ERR' means that the note text contains an actual error message. Please note that each LSR may receive multiple errors and messages. All errors and messages must be taken into account in order to determine the treatment for that particular LSR.

TYPE	EXPLANATION
C###	Refers to the actual BellSouth program that generated the note text
CANC	Automatically cancelled by system due to inactivity
CLAR	Clarification message
CLM	LSR has been claimed
CRR	Mechanically generated order has been corrected
ERR	The notes field contains an error message, and the ERR# field is populated
FCCN	Manual FOC send
ISS	Manually issued order
LOAD	Successful change in the LEO database
MECH	Means that the LSR in question was received via a mechanized method
NAVI	Navigation message - where the LSR was sent at that time
RETf	Return feed

SRET SOCS return message
SGNT LSR has been inserted to TSGNOUT queue and is waiting to be claimed
WEB Message is posted to the web (LENS)

FLOWTHROUGH LOGIC

This section contains an explanation of the process by which BellSouth determines whether or not an LSR has flowed through the system. Please note the following: as each of the flowthrough steps is executed, LSRs that meet that step's criteria are removed from the base pool of LSRs, and are not included in any further calculations. For example, an LSR with both an auto clarification and a MANUALP fallout condition will be counted only once in the flow through calculation. In this example, the LSR will appear in the planned manual 'bucket' since the manual fallout step is executed before the auto clarification step. In addition, an LSR with more than one error of the same type, e.g., auto clarification, will be counted only once in the flow through calculation. A list of all errors by error code and quantity can be found in the Flow Through Error Analysis report.

The steps for determining flowthrough are as follows (in order):

FATAL REJECTS

Finds all fatal reject records. A fatal reject is a record the system identifies as having severe CLEC errors that prohibit further processing and is returned to the CLEC. Fatal rejects are identified by looking for a note containing 'LSR REJECTED' and a note type of 'RETF' or 'C475', both of which indicate an LSR was rejected by the system. A fatally rejected LSR does not retain its initiating source system ID (i.e., LENS, EDI, TAG); therefore, it is impossible to determine the source of a fatal reject. Please note that fatal rejects are not a part of the flow through calculation and are NOT identified in this report.

AUTO CLARIFICATIONS

Finds all auto clarification records. An auto clarification record is a record the system identifies as having a CLEC error and returns the record to the CLEC with no further processing. All auto clarification LSRs contain the words 'AUTO CLARIFICATION' in the notes field.

PLANNED MANUALS

Finds all planned manual and manual clarification records. A planned manual LSR is an LSR that the system is not designed to handle mechanically due to its complexity. As a result, the LSR falls out for manual handling so that processing can be completed. A planned manual LSR will have the text 'MANUALP' as the first seven characters of the notes field.

FLOWTHROUGH LSRs

Finds all records that have had service orders issued in SOCS, i.e., all records that flowed through the system. An LSR is defined as having flowed through if the following logic is true:

- The note contains the text 'FOC STAGED FOR LSR' ***OR*** 'FOC AND CN STAGED FOR LSR'

AND

- The note contains the text 'ORDER NUM' ***OR*** 'INFO-ORDER' ***OR*** 'CANCELLED'

SYSTEM FALLOUT

Any LSRs that did not flow through the systems and were not planned manuals, fatal rejects, or auto clarifications are defined as system fallout.

CLEC CAUSED FALLOUT

CLEC caused fallout is defined as those LSRs with clarifications returned and/or clarifications posted.

CLARIFICATIONS RETURNED

Find all clarification returned LSRs. A clarification returned designation indicates that an LSR was received and was LESOG eligible, but could not flow through because additional information was required in order to process the LSR. The LSR requires a Belisouth representative to review it; if the error is determined to be a CLEC error, the LSR is clarified back to the CLEC. This LSR contains the text 'CLARIFICATIONS RETURNED' in the notes field.

CLARIFICATIONS POSTED

Finds all clarifications posted LSRs. A clarification posted is identical to a clarification returned except that the clarification is posted to the web (LENS) rather than being sent to the CLEC via EDI or TAG. A clarification posted LSR contains the text 'CLARIFICATIONS POSTED' in the notes field.

BST CAUSED FALLOUT

All other LSRs that fall out of the system are counted, by default, as 'BST Caused Fallout'.

LSRS AND ASSOCIATED MESSAGES FOR THIS PERIOD

LIST OF LSRS WITH ACTIVITY DURING THE MONTH THAT WERE INCLUDED IN THIS MONTH'S FLOW THROUGH CALCULATION.

The following is a list of the LSRs originated this month and included in the flow through calculation, and all messages associated with each LSR received. Again, please remember that you must take into account all the messages and errors for each LSR to determine its treatment.

CC	PO	VER	TIMESTAMP	TYPE	ERR#	NOTE OR ERROR DESCRIPTION
7125	ZX4043499578	00	2000-06-01 09:45:20.1235	C818		LSR LOADED AS MECHANIZED
7125	ZX4043499578	00	2000-06-01 09:45:20.8131	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX4043499578	00	2000-06-01 09:46:41.3445	ERR	7905	RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT
7125	ZX4043499578	00	2000-06-01 09:46:41.3991	C380		"AUTO CLARIFICATION" PLACED BY LESOG
7125	ZX4043499578	00	2000-06-01 09:46:41.6959	C475		CLARIFICATIONS RETURNED - G7905
7125	ZX4043499578	00	2000-06-01 09:46:41.6962	C475		855 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
7125	ZX4043499578	02	2000-06-01 11:30:08.9119	C818		LSR LOADED AS MECHANIZED
7125	ZX4043499578	02	2000-06-01 11:30:09.3329	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX4043499578	02	2000-06-01 11:30:58.8882	C380		INFO-ORDER NUM: NO9NMRG7
7125	ZX4043499578	02	2000-06-01 11:30:58.9887	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX4043499578	02	2000-06-01 11:41:54.7585	C280		845 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX4043499578	02	2000-06-01 11:41:55.2552	C475		855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZX7704239008	00	2000-06-07 13:30:23.5817	C818		LSR LOADED AS MECHANIZED
7125	ZX7704239008	00	2000-06-07 13:30:23.9364	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX7704239008	00	2000-06-07 13:33:46.2940	C380		INFO-OUT TO SOER
7125	ZX7704239008	00	2000-06-07 13:33:46.3575	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX7704239008	00	2000-06-07 13:33:46.3596	C380		INFO-ORDER NUM: NO6YC3R5
7125	ZX7704239008	00	2000-06-07 13:56:36.1798	C280		845 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX7704239008	00	2000-06-07 13:56:36.6670	C475		855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZX7705907400	00	2000-06-01 12:00:07.5985	C818		LSR LOADED AS MECHANIZED
7125	ZX7705907400	00	2000-06-01 12:00:08.1144	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX7705907400	00	2000-06-01 12:01:19.7597	C380		INFO-ORDER NUM: NOBWAHJ4
7125	ZX7705907400	00	2000-06-01 12:01:19.8539	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX7705907400	00	2000-06-01 12:26:15.8293	C280		845 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX7705907400	00	2000-06-01 12:26:16.1204	C475		855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXALTY0001073A	00	2000-06-30 15:00:36.6672	C818		LSR LOADED AS MECHANIZED
7125	ZXALTY0001073A	00	2000-06-30 15:00:37.7132	C865		LSR HAS BEEN SENT TO LESOG
7125	ZXALTY0001073A	00	2000-06-30 15:02:03.5844	ERR	7905	RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT
7125	ZXALTY0001073A	00	2000-06-30 15:02:03.6303	C380		"AUTO CLARIFICATION" PLACED BY LESOG
7125	ZXALTY0001073A	00	2000-06-30 15:02:04.0723	C475		CLARIFICATIONS RETURNED - G7905
7125	ZXALTY0001073A	00	2000-06-30 15:02:04.0736	C475		855 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED

7125 ZXAATLY00004498 03 2000-06-07 12:45:17.1212 CB18
7125 ZXAATLY00004498 03 2000-06-07 12:45:17.5417 C865
7125 ZXAATLY00004498 03 2000-06-07 12:46:45.2506 C380
7125 ZXAATLY00004498 03 2000-06-07 12:46:45.6081 SGNT
7125 ZXAATLY00004498 03 2000-06-07 12:46:45.6148 C380
7125 ZXAATLY00004498 03 2000-06-08 16:00:21.4585 SGNT
7125 ZXAATLY00004498 03 2000-06-08 16:00:21.5487 ERR
7125 ZXAATLY00004498 03 2000-06-08 16:00:37.5337 CLAR
7125 ZXAATLY00004498 03 2000-06-08 16:00:37.5409 SGNT
7125 ZXAATLY00004498 03 2000-06-08 16:00:38.1441 C475
7125 ZXAATLY00004498 03 2000-06-08 16:00:38.1448 C475
7125 ZXAATLY00004498 04 2000-06-13 14:30:17.7535 CB18
7125 ZXAATLY00004498 04 2000-06-13 14:30:18.2018 C865
7125 ZXAATLY00004498 04 2000-06-13 14:30:51.1352 C380
7125 ZXAATLY00004498 04 2000-06-13 14:30:51.1992 SGNT
7125 ZXAATLY00004498 04 2000-06-13 14:30:51.2020 C380
7125 ZXAATLY00004498 04 2000-06-15 12:36:51.7925 CLM
7125 ZXAATLY00004498 04 2000-06-15 12:36:51.8370 CLM
7125 ZXAATLY00004498 04 2000-06-15 12:40:05.9476 ERR
7125 ZXAATLY00004498 04 2000-06-15 12:40:17.4481 CLAR
7125 ZXAATLY00004498 04 2000-06-15 12:40:17.6631 C475
7125 ZXAATLY00004498 04 2000-06-15 12:40:17.6635 C475
7125 ZXAATLY00004498 05 2000-06-16 09:15:28.9593 CB18
7125 ZXAATLY00004498 05 2000-06-16 09:15:29.6985 C865
7125 ZXAATLY00004498 05 2000-06-16 09:16:24.1009 C380
7125 ZXAATLY00004498 05 2000-06-16 09:16:24.1678 SGNT
7125 ZXAATLY00004498 05 2000-06-16 09:16:24.1732 C380
7125 ZXAATLY00004498 05 2000-06-20 07:51:53.5533 CLM
7125 ZXAATLY00004498 05 2000-06-20 07:51:53.5764 CLM
7125 ZXAATLY00004498 05 2000-06-20 07:55:25.8176 ISS
7125 ZXAATLY00004498 05 2000-06-20 08:11:54.4058 C280
7125 ZXAATLY00004498 05 2000-06-20 08:11:54.9116 C475
7125 ZXAATLY00004498 05 2000-06-22 17:52:31.0542 C280
7125 ZXAATLY00004498 05 2000-06-23 13:15:03.7464 CB18
7125 ZXAATLY00004498 05 2000-06-23 13:15:04.1584 C865
7125 ZXAATLY00004498 05 2000-06-23 15:28:31.2963 C380
7125 ZXAATLY00004498 05 2000-06-23 15:28:31.6232 SGNT
7125 ZXAATLY00004498 05 2000-06-27 10:38:13.8737 CLM
7125 ZXAATLY00004498 05 2000-06-27 10:38:13.9760 CLM
7125 ZXAATLY00004498 05 2000-06-27 10:38:59.0475 ISS
7125 ZXAATLY00004498 05 2000-06-27 10:56:34.6589 C280
7125 ZXAATLY00004498 05 2000-06-27 10:56:34.8858 C475
7125 ZXAATLY00004498 05 2000-06-27 10:56:37.0328 C475
7125 ZXAATLY00004498 03 2000-06-03 08:56:30.9809 C280
7125 ZXAATLY0000467A 04 2000-06-07 09:15:05.9534 CB18
7125 ZXAATLY0000467A 04 2000-06-07 09:15:06.6789 C865
7125 ZXAATLY0000467A 04 2000-06-07 09:15:38.5574 C380
7125 ZXAATLY0000467A 04 2000-06-07 09:15:38.7386 SGNT
7125 ZXAATLY0000467A 04 2000-06-07 09:15:38.7419 C380
7125 ZXAATLY0000467A 04 2000-06-07 13:56:22.5966 CLM
7125 ZXAATLY0000467A 04 2000-06-07 13:56:22.6357 CLM
7125 ZXAATLY0000467A 04 2000-06-07 13:56:53.2471 C280
7125 ZXAATLY0000467A 04 2000-06-07 13:56:53.4283 C475
7125 ZXAATLY0000467A 04 2000-06-07 14:12:23.7352 C280
7125 ZXAATLY0000467A 04 2000-06-09 05:27:14.0066 C280
7125 ZXAATLY0000597C 02 2000-06-01 08:26:10.0632 CLM
7125 ZXAATLY0000597C 02 2000-06-01 08:26:10.1472 CLM
7125 ZXAATLY0000597C 02 2000-06-01 08:26:47.4091 C280

LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGNOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
DB02C240 UPDATED TSGNOUT
1000 DUP LOOP SERVICE PG AND PRS CDC X1772.
Clarify Requested for VER-9
DB02C240 DELETED FROM TSGNOUT
CLARIFICATIONS RETURNED- 1000
865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGNOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - PNDNTFB
LSR CLAIMED BY CUID - PNDNTFB
1000 DUE TO RPON. CDC X1772
Clarify Requested for VER-9
CLARIFICATIONS RETURNED- 1000
865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGNOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - LZBKNGZ
LSR CLAIMED BY CUID - LZBKNGZ
ORDER CO1YCF07 DUE 6-27-00. GGOLAR X1753
865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
865 ISSUED RETURN-FEED # 0001 FOC SENT
PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGNOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - PNDNTFB
LSR CLAIMED BY CUID - PNDNTFB
ORD CO1YCF07 DD 7-10-00 CDC X1772
865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
865 ISSUED RETURN-FEED # 0001 FOC SENT
POS ISSUED, SOCS STATUS - PD PENDING ORDER
PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGNOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - YHBWMLMP
LSR CLAIMED BY CUID - YHBWMLMP
865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
865 ISSUED RETURN-FEED # 0001 FOC SENT
PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
LSR CLAIMED BY CUID - LZBKNGZ
LSR CLAIMED BY CUID - LZBKNGZ
865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"

7125 ZXA1LY00006597C 02 2000-06-01 08:28:47 6845 C475 965 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXA1LY00006597C 02 2000-06-01 08:27:22 0742 ISS ORD CORONAM9 DUJE 6-12-00 38.LYFU645446.SB X2007 GGOLAR
7125 ZXA1LY00006597C 02 2000-06-02 10:26:30 6886 C475 POS ISSUED, SOCS STATUS - PD PENDING ORDER
7125 ZXA1LY00006597C 02 2000-06-12 22:28:17 8001 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006597C 02 2000-06-12 22:26:19 5957 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006597C 02 2000-06-13 13:43:15 1749 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006597C 02 2000-06-13 16:13:35 5195 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006597C 02 2000-06-13 16:14:17 2413 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006597C 02 2000-06-13 16:14:49 3034 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006597C 02 2000-06-13 17:34:10 2445 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006597C 02 2000-06-13 17:35:41 4594 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006597C 02 2000-06-13 17:35:41 7735 C475 965 ISSUED RETURN-FEED # 0003 COMPLETION SENT
7125 ZXA1LY00006597C 02 2000-06-01 09:15:08 0237 C818 LSR LOADED AS MECHANIZED
7125 ZXA1LY00006597C 02 2000-06-01 09:15:08 6711 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXA1LY00006597C 02 2000-06-01 09:15:48 1420 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXA1LY00006597C 02 2000-06-01 09:15:48 2065 SGNIT DB02C380 INSERTED TO TSGNOUT
7125 ZXA1LY00006597C 02 2000-06-01 09:15:48 2100 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXA1LY00006597C 02 2000-06-03 12:45:23 7425 CLM LSR CLAIMED BY CUID - BLWNCZ
7125 ZXA1LY00006597C 02 2000-06-03 12:45:23 7625 CLM LSR CLAIMED BY CUID - BLWNCZ
7125 ZXA1LY00006597C 02 2000-06-03 12:47:25 8247 ERR 1000 B11 IS REQUIRED WHEN BAN 1 IS POPULATED. JAMES EXT 1764
7125 ZXA1LY00006597C 02 2000-06-03 12:47:31 5997 CLAR Clarify Requested for VER-9
7125 ZXA1LY00006597C 02 2000-06-03 12:47:32 1459 C475 CLARIFICATIONS RETURNED- 1000
7125 ZXA1LY00006597C 02 2000-06-03 12:47:32 1462 C475 965 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXA1LY00006597C 02 2000-06-07 08:30:16 6342 C818 LSR LOADED AS MECHANIZED
7125 ZXA1LY00006597C 02 2000-06-07 08:30:17 1258 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXA1LY00006597C 02 2000-06-07 08:30:33 6913 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXA1LY00006597C 02 2000-06-07 08:30:33 8201 SGNIT DB02C380 INSERTED TO TSGNOUT
7125 ZXA1LY00006597C 02 2000-06-07 08:30:33 8227 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXA1LY00006597C 02 2000-06-08 10:10:18 4806 CLM LSR CLAIMED BY CUID - PNDNTFB
7125 ZXA1LY00006597C 02 2000-06-08 10:10:18 4810 CLM LSR CLAIMED BY CUID - PNDNTFB
7125 ZXA1LY00006597C 02 2000-06-08 10:11:26 0752 ERR 1000 B11 FIELD INVALID CDC X1772
7125 ZXA1LY00006597C 02 2000-06-08 10:11:50 7639 CLAR Clarify Requested for VER-9
7125 ZXA1LY00006597C 02 2000-06-08 10:11:51 3961 C475 CLARIFICATIONS RETURNED- 1000
7125 ZXA1LY00006597C 02 2000-06-08 10:11:51 3967 C475 965 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXA1LY00006597C 02 2000-06-09 09:15:06 2018 C818 LSR LOADED AS MECHANIZED
7125 ZXA1LY00006597C 02 2000-06-09 09:15:07 0282 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXA1LY00006597C 02 2000-06-09 09:23:24 8650 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXA1LY00006597C 02 2000-06-09 09:23:25 0911 SGNIT DB02C380 INSERTED TO TSGNOUT
7125 ZXA1LY00006597C 02 2000-06-09 09:23:25 1038 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXA1LY00006597C 02 2000-06-12 07:31:01 9251 CLM LSR CLAIMED BY CUID - LZBKZG
7125 ZXA1LY00006597C 02 2000-06-12 07:31:01 9677 CLM LSR CLAIMED BY CUID - LZBKZG
7125 ZXA1LY00006597C 02 2000-06-12 07:39:17 5241 ERR 1000 B11 INCORRECT. RPON ZXA1LY00006550. GGOLAR X1753
7125 ZXA1LY00006597C 02 2000-06-12 07:39:39 9724 CLAR Clarify Requested for VER-9
7125 ZXA1LY00006597C 02 2000-06-12 07:39:40 6540 C475 CLARIFICATIONS RETURNED- 1000
7125 ZXA1LY00006597C 02 2000-06-12 07:39:40 6544 C475 965 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXA1LY00006597C 02 2000-06-13 08:30:12 2355 C818 LSR LOADED AS MECHANIZED
7125 ZXA1LY00006597C 02 2000-06-13 08:30:12 6810 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXA1LY00006597C 02 2000-06-13 08:30:59 4274 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXA1LY00006597C 02 2000-06-13 08:30:59 5403 SGNIT DB02C380 INSERTED TO TSGNOUT
7125 ZXA1LY00006597C 02 2000-06-13 08:30:59 5458 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXA1LY00006597C 02 2000-06-14 16:20:27 7634 CLM LSR CLAIMED BY CUID - LZBKZG
7125 ZXA1LY00006597C 02 2000-06-14 16:20:27 7662 CLM LSR CLAIMED BY CUID - LZBKZG
7125 ZXA1LY00006597C 02 2000-06-14 16:22:07 5055 ERR 1000 BAN1 OF N INCORRECT PLS VER. RPON ZXA1LY00006550. GGOLAR X1753
7125 ZXA1LY00006597C 02 2000-06-14 16:22:25 8211 CLAR Clarify Requested for VER-9
7125 ZXA1LY00006597C 02 2000-06-14 16:22:26 0611 C475 CLARIFICATIONS RETURNED- 1000
7125 ZXA1LY00006597C 02 2000-06-14 16:22:26 0614 C475 965 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXA1LY00006597C 02 2000-06-14 16:25:13 5131 ERR 1000 B11 OF N INCORRECT PLS VER. RPON ZXA1LY00006550. GGOLAR X1753.
7125 ZXA1LY00006597C 02 2000-06-14 16:25:25 4579 CLAR Clarify Requested for VER-9
7125 ZXA1LY00006597C 02 2000-06-14 16:25:25 5477 C475 CLARIFICATIONS RETURNED- 1000

7125 ZXA1LY00006555E 05 2000-06-14 16:25:25.5575 C475 865 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
7125 ZXA1LY00006555E 06 2000-06-15 08:30:39.1761 C818 LSR LOADED AS MECHANIZED
7125 ZXA1LY00006555E 06 2000-06-15 08:30:39.6937 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXA1LY00006555E 06 2000-06-15 08:30:48.2168 C380 MANUAL-LSR INVOLVED IN PROJECT OR HAS RPN
7125 ZXA1LY00006555E 06 2000-06-15 08:30:48.2497 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXA1LY00006555E 06 2000-06-15 08:30:48.2500 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXA1LY00006555E 06 2000-06-19 05:17:08.8596 CLM LSR CLAIMED BY CUID - YHBMJMP
7125 ZXA1LY00006555E 06 2000-06-19 05:17:08.9295 CLM LSR CLAIMED BY CUID - YHBMJMP
7125 ZXA1LY00006555E 06 2000-06-19 05:30:05.1699 ISS ORD COCDH639 06-26-00, SR D AARON X1760
7125 ZXA1LY00006555E 06 2000-06-19 05:56:14.2181 C280 865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXA1LY00006555E 06 2000-06-19 05:56:14.5758 C475 865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXA1LY00006555E 06 2000-06-19 05:56:20.5230 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006555E 06 2000-06-24 13:26:39.4413 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006555E 06 2000-06-24 13:26:40.5180 C475 POS ISSUED, SOCS STATUS - PD PENDING ORDER
7125 ZXA1LY00006555E 07 2000-06-26 10:15:20.7440 C818 LSR LOADED AS MECHANIZED
7125 ZXA1LY00006555E 07 2000-06-26 10:15:21.2961 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXA1LY00006555E 07 2000-06-26 10:16:12.5066 ERR 7465 CANNOT CANCEL ORDER
7125 ZXA1LY00006555E 07 2000-06-26 10:16:12.5481 C380 REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXA1LY00006555E 07 2000-06-26 10:16:12.7018 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXA1LY00006555E 07 2000-06-26 10:16:12.7021 C380 ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXA1LY00006555E 07 2000-06-26 10:16:13.5132 C475 865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXA1LY00006555E 07 2000-06-26 10:34:17.8669 CLM LSR CLAIMED BY CUID - PKYQHYK
7125 ZXA1LY00006555E 07 2000-06-26 10:34:17.8726 CLM LSR CLAIMED BY CUID - PKYQHYK
7125 ZXA1LY00006555E 07 2000-06-26 10:34:54.4108 CANCELLED ORDER COCDH639 PER SUP1 REQUEST ON VERSION 07 RECVD 06-26-00 RW X 1745
7125 ZXA1LY00006555E 07 2000-06-26 10:56:25.8900 C280 CANCELLED ORDER COCDH639 RECEIVED FROM SOCS
7125 ZXA1LY00006555E 07 2000-06-26 10:56:26.0103 C280 865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXA1LY00006555E 07 2000-06-26 10:56:26.2230 C475 865 ISSUED RETURN-FEED # 0002 FOC SENT
7125 ZXA1LY00006555E 10 2000-06-12 15:56:26.9125 C280 865 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXA1LY00006555E 10 2000-06-12 15:56:27.1786 C475 865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZXA1LY00006555E 11 2000-06-13 08:45:18.5506 C818 LSR LOADED AS MECHANIZED
7125 ZXA1LY00006555E 11 2000-06-13 08:45:18.8861 C965 LSR HAS BEEN SENT TO LESOG
7125 ZXA1LY00006555E 11 2000-06-13 09:36:08.6762 C380 MANUAL-LSR INVOLVED IN PROJECT OR HAS RPN
7125 ZXA1LY00006555E 11 2000-06-13 09:36:08.7790 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXA1LY00006555E 11 2000-06-13 09:36:08.8404 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXA1LY00006555E 11 2000-06-14 08:40:22.3286 CLM LSR CLAIMED BY CUID - LZBKXZG
7125 ZXA1LY00006555E 11 2000-06-14 08:40:22.3302 CLM LSR CLAIMED BY CUID - LZBKXZG
7125 ZXA1LY00006555E 11 2000-06-14 08:56:37.5524 C280 CANCELLED ORDER COCDH639 RECEIVED FROM SOCS
7125 ZXA1LY00006555E 11 2000-06-14 08:56:37.5925 C280 865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXA1LY00006555E 11 2000-06-14 08:56:38.0401 C475 865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXA1LY00006555E 06 2000-06-02 08:00:23.9138 C818 LSR LOADED AS MECHANIZED
7125 ZXA1LY00006555E 06 2000-06-02 08:00:24.5655 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXA1LY00006555E 06 2000-06-02 08:01:06.3887 ERR 7465 CANNOT CANCEL ORDER
7125 ZXA1LY00006555E 06 2000-06-02 08:01:06.4397 C380 REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXA1LY00006555E 06 2000-06-02 08:01:06.4506 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXA1LY00006555E 06 2000-06-02 08:01:06.4509 C380 ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXA1LY00006555E 06 2000-06-02 08:01:06.6031 C475 865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXA1LY00006555E 06 2000-06-02 08:11:25.8723 SGNT DB02C380 DELETED FROM TSIGNOUT
7125 ZXA1LY00006555E 06 2000-06-02 08:11:25.9343 C280 865 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXA1LY00006555E 06 2000-06-02 08:11:26.1812 C475 865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXA1LY00006555E 06 2000-06-03 13:56:20.1813 C280 865 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXA1LY00006555E 06 2000-06-03 13:56:20.5985 C475 865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZXA1LY00006555E 06 2000-06-06 10:00:49.6294 C280 865 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXA1LY00006555E 06 2000-06-06 10:00:49.9838 C475 865 ISSUED RETURN-FEED # 0004 JEOPARDY NOTIFICATION SENT
7125 ZXA1LY00006555E 06 2000-06-06 10:05:01.3586 C280 865 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXA1LY00006555E 06 2000-06-06 10:05:01.4320 C475 865 ISSUED RETURN-FEED # 0005 JEOPARDY NOTIFICATION SENT
7125 ZXA1LY00006555E 06 2000-06-20 07:26:24.5056 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXA1LY00006555E 03 2000-06-15 01:01:54.3033 CANC Cancelled By System
7125 ZXA1LY00006555E 03 2000-06-03 10:16:58.3178 CLM Lsr Claimed By CUID - YHBMJMP
7125 ZXA1LY00006555E 03 2000-06-03 10:26:22.9016 C280 CANCELLED ORDER COCDH639 RECEIVED FROM SOCS

7125 ZCATLY00009248 03 2000-06-03 10:26:22.9618 C280 845 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZCATLY00009248 03 2000-06-03 10:26:23.1581 C475 865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZCATLY00009277 05 2000-06-01 16:02:08.8060 CLM LSR CLAIMED BY CUID - BLWNCCLZ
7125 ZCATLY00009277 05 2000-06-01 16:02:08.8629 CLM LSR CLAIMED BY CUID - BLWNCCLZ
7125 ZCATLY00009277 05 2000-06-01 16:06:27.4256 ISS DDD CHG TO 6-15-00 THE ORDER NUMBER IS C086VBGI, JA EXT 1964
7125 ZCATLY00009277 05 2000-06-01 16:26:50.4501 C280 845 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZCATLY00009277 05 2000-06-01 16:26:50.7732 C475 865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZCATLY00009277 05 2000-06-01 16:27:06.7255 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN
7125 ZCATLY00009277 05 2000-06-15 14:41:39.3563 C280 845 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZCATLY00009277 05 2000-06-15 14:41:59.6249 C475 865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZCATLY00009277 05 2000-06-16 15:41:47.5562 C280 845 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZCATLY00009277 05 2000-06-16 15:41:47.5562 C280 865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZCATLY00001045 04 2000-06-02 10:30:04.0897 CB18 LSR LOADED AS MECHANIZED
7125 ZCATLY00001045 04 2000-06-02 10:30:05.0005 C865 LSR HAS BEEN SENT TO LESOG
7125 ZCATLY00001045 04 2000-06-02 10:30:38.8090 ERR 7465 CANNOT CANCEL ORDER
7125 ZCATLY00001045 04 2000-06-02 10:30:38.8562 C380 REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZCATLY00001045 04 2000-06-02 10:30:38.8599 SGNT DB02C380 INSERTED TO TSGNOUT
7125 ZCATLY00001045 04 2000-06-02 10:30:38.8618 C380 ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZCATLY00001045 04 2000-06-02 10:30:39.3149 C475 865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZCATLY00001045 04 2000-06-05 13:27:31.4416 SGNT DB02C280 DELETED FROM TSGNOUT
7125 ZCATLY00001045 04 2000-06-05 13:27:31.5224 C280 845 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZCATLY00001045 04 2000-06-22 13:27:31.7740 C475 865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZCATLY00001045 04 2000-06-22 13:29:51.7179 ORDER CANCELLED PER SUP 1 REQUEST ORDER COTWINK7 WAS IN MA STATUS RWX 1745
7125 ZCATLY00001045 04 2000-06-22 14:50:24.6958 C240 LSR PROC STATUS BACK TO F CUID - PKYOHYK
7125 ZCATLY00001045 04 2000-06-22 15:52:40.2884 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN
7125 ZCATLY00001063 03 2000-06-07 15:00:10.2031 CB18 LSR LOADED AS MECHANIZED
7125 ZCATLY00001063 03 2000-06-07 15:00:10.8670 C865 LSR HAS BEEN SENT TO LESOG
7125 ZCATLY00001063 03 2000-06-07 15:01:26.4210 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZCATLY00001063 03 2000-06-07 15:01:26.4846 SGNT DB02C380 INSERTED TO TSGNOUT
7125 ZCATLY00001063 03 2000-06-07 15:01:26.4867 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZCATLY00001063 03 2000-06-09 15:55:35.6591 CLM LSR CLAIMED BY CUID - YHBWMLMP
7125 ZCATLY00001063 03 2000-06-09 15:56:39.7091 ISS ORD C04KX18 DD 06-23-00, SR D AARON X1760
7125 ZCATLY00001063 03 2000-06-09 16:12:51.3111 C280 845 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZCATLY00001063 03 2000-06-09 16:12:51.5518 C475 865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZCATLY00001063 03 2000-06-09 16:12:56.4995 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN
7125 ZCATLY00001063 04 2000-06-12 14:30:04.5134 CB18 LSR LOADED AS MECHANIZED
7125 ZCATLY00001063 04 2000-06-12 14:30:05.1487 C865 LSR HAS BEEN SENT TO LESOG
7125 ZCATLY00001063 04 2000-06-12 14:30:19.8766 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZCATLY00001063 04 2000-06-12 14:30:19.9413 SGNT DB02C380 INSERTED TO TSGNOUT
7125 ZCATLY00001063 04 2000-06-12 14:30:19.9741 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZCATLY00001063 04 2000-06-14 08:18:15.8928 CLM LSR CLAIMED BY CUID - YHBWMLMP
7125 ZCATLY00001063 04 2000-06-14 08:18:16.0591 CLM LSR CLAIMED BY CUID - YHBWMLMP
7125 ZCATLY00001063 04 2000-06-14 09:25:46.8594 ERR 1000 INVALID TOS, SR D AARON X1760
7125 ZCATLY00001063 04 2000-06-14 09:25:50.5656 CLAR Clarify Requested for VER-9
7125 ZCATLY00001063 04 2000-06-14 09:25:50.9235 C475 CLARIFICATIONS RETURNED: 1000
7125 ZCATLY00001063 04 2000-06-14 09:25:50.9239 C475 865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZCATLY00001063 04 2000-06-14 09:41:38.0068 C280 C04KX18#ATTEMPTS-00 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZCATLY00001063 04 2000-06-14 09:41:44.3864 C280 C04KX18#ATTEMPTS-00 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZCATLY00001063 04 2000-06-14 09:41:57.2954 C280 CANCEL SVC ORD BYPASSED, SUPP NOT "01"
7125 ZCATLY00001063 04 2000-06-14 10:11:16.9409 C280 C04KX18#ATTEMPTS-01 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZCATLY00001063 04 2000-06-14 10:11:17.6379 C280 C04KX18#ATTEMPTS-01 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZCATLY00001063 04 2000-06-14 10:41:16.6032 C280 C04KX18#FOC BUILD AND HOLD REQUESTED
7125 ZCATLY00001063 04 2000-06-14 10:41:17.0700 C475 865 ISSUED RETURN-FEED # 0002 FOC BUILT NOT SENT
7125 ZCATLY00001063 04 2000-06-14 10:41:17.2472 C280 C04KX18#FOC BUILD AND HOLD REQUESTED
7125 ZCATLY00001063 04 2000-06-14 10:41:17.3028 C475 865 ISSUED RETURN-FEED # 0003 FOC BUILT NOT SENT
7125 ZCATLY00001063 05 2000-06-14 11:51:32.8736 CB18 LSR LOADED AS MECHANIZED
7125 ZCATLY00001063 05 2000-06-14 11:51:33.2461 C865 LSR HAS BEEN SENT TO LESOG
7125 ZCATLY00001063 05 2000-06-14 11:52:39.1631 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON

7125 ZXAATLY0001190 02 2000-06-12 15:45:40.7662 C380
7125 ZXAATLY0001190 02 2000-06-12 15:45:40.8371 SGNIT
7125 ZXAATLY0001190 02 2000-06-12 15:45:40.8398 C380
7125 ZXAATLY0001190 02 2000-06-14 08:23:50.4337 CLM
7125 ZXAATLY0001190 02 2000-06-14 08:23:50.4926 CLM
7125 ZXAATLY0001190 02 2000-06-14 08:41:39.6651 C280
7125 ZXAATLY0001190 02 2000-06-14 08:41:39.7795 C280
7125 ZXAATLY0001190 02 2000-06-14 08:41:40.2696 C475
7125 ZXAATLY0001261 00 2000-06-12 16:01:16.2418 C818
7125 ZXAATLY0001261 00 2000-06-12 16:01:20.6594 C865
7125 ZXAATLY0001261 00 2000-06-13 05:15:04.8221 C510
7125 ZXAATLY0001261 00 2000-06-13 05:15:12.5294 C865
7125 ZXAATLY0001261 00 2000-06-13 05:17:30.9236 ERR
7125 ZXAATLY0001261 00 2000-06-13 05:17:31.1264 C380
7125 ZXAATLY0001261 00 2000-06-13 05:17:31.6501 C475
7125 ZXAATLY0001261 00 2000-06-13 05:17:31.6963 C475
7125 ZXAATLY0001261 02 2000-06-13 08:15:04.9322 C818
7125 ZXAATLY0001261 02 2000-06-13 08:15:05.5649 C865
7125 ZXAATLY0001261 02 2000-06-13 08:16:37.0194 ERR
7125 ZXAATLY0001261 02 2000-06-13 08:16:37.3298 C380
7125 ZXAATLY0001261 02 2000-06-13 08:16:38.4635 C475
7125 ZXAATLY0001261 02 2000-06-13 08:16:38.4639 C475

MANUAL-LSR INVOLVED IN PROJECT OR HAS RPN
DB02C380 INSERTED TO TSGNOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - LZBKNGZ
CANCELED ORDER COBNFJ7 RECEIVED FROM SOCS
885 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
865 ISSUED RETURN-FEED # 0001 FOC SENT
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
LSR RESSENT - NO RESPONSE FROM BSOGLSOG
LSR HAS BEEN SENT TO LESOG
7895 RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP
"AUTO CLARIFICATION" PLACED BY LESOG
CLARIFICATIONS RETURNED- G7935
865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
7895 RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP
"AUTO CLARIFICATION" PLACED BY LESOG
CLARIFICATIONS RETURNED- G7935
865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED

7125 ZXAATLY0001261 03 2000-06-13 10:30:23.6871 C818
7125 ZXAATLY0001261 03 2000-06-13 10:30:24.0861 C865
7125 ZXAATLY0001261 03 2000-06-13 10:31:35.0465 ERR
7125 ZXAATLY0001261 03 2000-06-13 10:31:36.1682 SGNIT
7125 ZXAATLY0001261 03 2000-06-13 10:31:36.1949 C380
7125 ZXAATLY0001261 03 2000-06-15 08:43:45.8142 SGNIT
7125 ZXAATLY0001261 03 2000-06-15 08:43:45.8146 ERR
7125 ZXAATLY0001261 03 2000-06-15 08:43:48.2089 CLAR
7125 ZXAATLY0001261 03 2000-06-15 08:43:48.2618 SGNIT
7125 ZXAATLY0001261 03 2000-06-15 08:43:48.6528 C475
7125 ZXAATLY0001261 03 2000-06-15 08:43:48.6532 C475
7125 ZXAATLY0001261 04 2000-06-15 11:00:41.8791 C818
7125 ZXAATLY0001261 04 2000-06-15 11:00:42.1477 C865
7125 ZXAATLY0001261 04 2000-06-15 11:03:20.9914 ERR
7125 ZXAATLY0001261 04 2000-06-15 11:03:21.2226 SGNIT
7125 ZXAATLY0001261 04 2000-06-15 11:03:21.2255 C380
7125 ZXAATLY0001261 04 2000-06-19 10:27:45.5567 NOTE
7125 ZXAATLY0001261 04 2000-06-21 13:00:42.4862 C280
7125 ZXAATLY0001261 04 2000-06-21 13:00:42.8109 C475
7125 ZXAATLY0001261 04 2000-06-21 13:02:09.7171 C280
7125 ZXAATLY0001261 04 2000-06-26 15:11:41.1720 C280
7125 ZXAATLY0001261 04 2000-06-26 15:11:41.5444 C475
7125 ZXAATLY0001261 05 2000-06-26 16:15:06.7539 C818
7125 ZXAATLY0001261 05 2000-06-26 16:15:08.4151 C865
7125 ZXAATLY0001261 05 2000-06-26 16:15:39.8182 ERR
7125 ZXAATLY0001261 05 2000-06-26 16:15:39.8596 C380
7125 ZXAATLY0001261 05 2000-06-26 16:15:39.9573 SGNIT
7125 ZXAATLY0001261 05 2000-06-26 16:15:39.9575 C380
7125 ZXAATLY0001261 05 2000-06-26 16:15:40.2797 C475
7125 ZXAATLY0001261 05 2000-06-27 16:56:31.8372 CLM
7125 ZXAATLY0001261 05 2000-06-27 16:56:31.8387 CLM
7125 ZXAATLY0001261 05 2000-06-27 16:57:30.1349
7125 ZXAATLY0001261 05 2000-06-27 16:58:45.9297 NOTE

LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
7755 UNE - NPANXX NOT FOUND IN CLI TABLE
DB02C380 INSERTED TO TSGNOUT
LSR IN "ERROR" STATUS PLACED BY LESOG
DB02C240 UPDATED TSGNOUT
1000 B1 FIELD INVALID, SR D AARONN X1760
Clarify Requested for VER-9
DB02C240 DELETED FROM TSGNOUT
CLARIFICATIONS RETURNED- 1000
865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
7755 UNE - NPANXX NOT FOUND IN CLI TABLE
DB02C380 INSERTED TO TSGNOUT
LSR IN "ERROR" STATUS PLACED BY LESOG
LSR CLAIMED BY PKYQHYK
ISS C016VTW6 DUE 06-26-00 CKKT 38LYFU.646830. SB. PTPM1 X 613 FOR KIMBERLY MESSNE- ROBIN X 1745
885 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
865 ISSUED RETURN-FEED # 0001 FOC SENT
PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
885 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
7485 CANNOT CANCEL ORDER
REQUEST TO BUILD DUMMY FOC SENT TO C475
DB02C380 INSERTED TO TSGNOUT
ERROR WITH PENDING ORDER PLACED BY LESOG
865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
LSR CLAIMED BY CUID - PKYQHYK
LSR CLAIMED BY CUID - PKYQHYK
CANCELED ORDER C016VTW6 IN MA STATUS RW X 1745
CANCELED ORDER PER SUP1 REQUEST RW X 1745

7125 ZXA1LY0001261 05 2000-06-27 17:13:22.2101 C280
7125 ZXA1LY0001261 05 2000-06-27 17:13:22.2748 C280
7125 ZXA1LY0001261 05 2000-06-27 17:13:22.5935 C475
7125 ZXA1LY0001261 00 2000-06-20 10:45:05.5692 C818
7125 ZXA1LY0001261 00 2000-06-20 10:45:06.5758 C865
7125 ZXA1LY0001261 00 2000-06-20 20:05:45.4091 C380
7125 ZXA1LY0001261 00 2000-06-20 20:05:45.7510 SGN1
7125 ZXA1LY0001261 00 2000-06-20 20:05:45.7941 C380
7125 ZXA1LY0001261 00 2000-06-22 05:57:15.1538 CLM
7125 ZXA1LY0001261 00 2000-06-22 05:57:15.1907 CLM
7125 ZXA1LY0001261 00 2000-06-22 05:57:43.5427 ERR
7125 ZXA1LY0001261 00 2000-06-22 05:57:45.9837 CLAR
7125 ZXA1LY0001261 00 2000-06-22 05:57:46.3227 C475
7125 ZXA1LY0001261 00 2000-06-22 16:56:08.3173 C475
7125 ZXA1LY0001261 02 2000-06-22 16:30:34.0065 C818
7125 ZXA1LY0001261 02 2000-06-22 16:30:35.9278 C865
7125 ZXA1LY0001261 02 2000-06-22 21:01:44.7751 C380
7125 ZXA1LY0001261 02 2000-06-22 21:01:45.0029 SGN1
7125 ZXA1LY0001261 02 2000-06-23 16:56:08.3173 CLM
7125 ZXA1LY0001261 02 2000-06-23 16:56:08.3212 CLM
7125 ZXA1LY0001261 02 2000-06-23 16:56:50.2553 ERR
7125 ZXA1LY0001261 02 2000-06-23 16:58:55.3391 CLAR
7125 ZXA1LY0001261 02 2000-06-23 16:58:55.7458 C475
7125 ZXA1LY0001261 02 2000-06-23 16:58:55.7463 C475
7125 ZXA1LY0001261 03 2000-06-26 12:00:24.1641 C818
7125 ZXA1LY0001261 03 2000-06-26 12:00:24.4688 C865
7125 ZXA1LY0001261 03 2000-06-26 12:01:11.2478 C380
7125 ZXA1LY0001261 03 2000-06-26 12:01:11.2696 SGN1
7125 ZXA1LY0001261 03 2000-06-26 12:01:11.2713 C380
7125 ZXA1LY0001261 03 2000-06-28 11:40:17.7764 CLM
7125 ZXA1LY0001261 03 2000-06-28 11:40:17.9205 CLM
7125 ZXA1LY0001261 03 2000-06-28 11:47:54.1991 ISS
7125 ZXA1LY0001261 03 2000-06-28 12:11:23.4346 C280
7125 ZXA1LY0001261 03 2000-06-28 12:11:23.7679 C475
7125 ZXA1LY0001261 03 2000-06-29 16:42:12.7591 C280
7125 ZXA1LY0001261 03 2000-06-29 16:42:28.2571 C475
7125 ZXA1LY0001261 00 2000-06-22 09:45:22.3948 C818
7125 ZXA1LY0001362 00 2000-06-22 09:45:23.6378 C865
7125 ZXA1LY0001362 00 2000-06-22 09:47:02.0335 C380
7125 ZXA1LY0001362 00 2000-06-22 09:47:02.2046 SGN1
7125 ZXA1LY0001362 00 2000-06-22 09:47:02.2123 C380
7125 ZXA1LY0001362 00 2000-06-23 06:34:30.2329 CLM
7125 ZXA1LY0001362 00 2000-06-23 06:34:30.2976 CLM
7125 ZXA1LY0001362 00 2000-06-23 06:43:46.9468 ERR
7125 ZXA1LY0001362 00 2000-06-23 06:43:55.3356 CLAR
7125 ZXA1LY0001362 00 2000-06-23 06:43:55.8079 C475
7125 ZXA1LY0001362 00 2000-06-23 16:43:55.8082 C475
7125 ZXA1LY0001362 02 2000-06-23 16:15:04.6310 C818
7125 ZXA1LY0001362 02 2000-06-23 16:15:04.9898 C865
7125 ZXA1LY0001362 02 2000-06-23 17:22:31.1723 SGN1
7125 ZXA1LY0001362 02 2000-06-23 17:22:31.1723 C380
7125 ZXA1LY0001362 02 2000-06-26 16:22:39.3306 CLM
7125 ZXA1LY0001362 02 2000-06-26 16:22:39.3358 CLM
7125 ZXA1LY0001362 02 2000-06-26 16:29:18.7671 ERR
7125 ZXA1LY0001362 02 2000-06-26 16:29:21.9426 CLAR
7125 ZXA1LY0001362 02 2000-06-26 16:29:22.0222 C475
7125 ZXA1LY0001362 02 2000-06-26 16:29:22.0225 C475

CANCELLED ORDER CO16VTW6 RECEIVED FROM SOCS
865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
865 ISSUED RETURN-FEED # 0002 FOC SENT
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGHOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - YHBWMLP
LSR CLAIMED BY CUID - YHBWMLP
1000 RPON MISSING, SR D AARON X1760
Clarify Requested for VER-9
CLARIFICATIONS RETURNED- 1000
865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
LSR LOADED AS MECHANIZED
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGHOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - YHBWMLP
LSR CLAIMED BY CUID - YHBWMLP
1000 RPON MISSING ARE TYPED INCORRECTLY, SR D AARON X1760
Clarify Requested for VER-9
CLARIFICATIONS RETURNED- 1000
865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGHOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - YHBWMLP
ORD CO16DWX6 DD 07-07-00, SR D AARON X1760
865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
POS ISSUED, SOCS STATUS - PD
PENDING ORDER
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGHOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - BLVWNCCLZ
LSR CLAIMED BY CUID - BLVWNCCLZ
1000 THE LSO AND B11 IS INCORRECT, JAMES EXT 1764
Clarify Requested for VER-9
CLARIFICATIONS RETURNED- 1000
865 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
LSR LOADED AS MECHANIZED
LSR HAS BEEN SENT TO LESOG
MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
DB02C380 INSERTED TO TSGHOUT
LSR IN "RECYCLE" PLACED STATUS BY LESOG
LSR CLAIMED BY CUID - NRZKLNQ
LSR CLAIMED BY CUID - NRZKLNQ
1000 PLS PROVIDE AN NACCT NUMBER IN THE B11 FIELD, NYCOLLE X1733
Clarify Requested for VER-9
CLARIFICATIONS RETURNED- 1000
865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED



Robert W. Quinn, Jr.
Director - Federal Government Affairs

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December 23, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Ex parte - CC Docket No 98-121
Second Application of BellSouth Corporation,
BellSouth Telecommunications, Inc., and
BellSouth Long Distance, Inc., for Provision of
In-Region, InterLATA Services in Louisiana

Dear Ms. Roman Salas:

Today, Steve Garavito, Al Lewis, Pam Nelson, Jay Bradbury, Jim Hill (via telephone) and I of AT&T, and I met with Michael Pryor, Jake Jennings, Andrea Kearney, Claudia Pabo and Claudia Fox of the Common Carrier Bureau, as well as representatives from BellSouth and MCI. At the request of Commission staff, AT&T reviewed its position of record in this proceeding with an emphasis on the need for a nondiscriminatory interface for maintenance and repair. AT&T reviewed the support for the position AT&T has taken in its filings in this docket using the enclosed materials. In sum, AT&T reasserted the position that it today has two choices for repair and maintenance operations in BellSouth territory given BellSouth's interface options: 1) choose to use an interface that provides significantly less functionality than BellSouth's own retail representatives enjoy (ECTA), or 2) choose two interfaces to achieve the same functionality as BellSouth's retail representatives enjoy (TAFI). Under the second option, the new entrant faces the dual entry issues (increased errors and cost) previously identified by the Commission as the reason machine-to-machine interfaces are required for pre-ordering/ordering functions.

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List A B C D E



Docket No. 000731-TP
JM3-24
Page 1 of 121

Tab A

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Q. Is it necessary to maintain your own database for trouble history given that same information is contained in BellSouth's databases which is accessible through TAFI?

- Yes. It is vital to view the maintenance and repair process from the correct perspective.
- The customer reporting a trouble is the CLEC's customer and the process being invoked is the CLEC's process, not BellSouth's.
- A customer's trouble must first be input to and satisfy the CLEC's process before it can transfer to BellSouth's process.
- AT&T's customer can be calling to report a trouble condition in one of six major product categories:
 - Local
 - Long Distance
 - Wireless
 - Video
 - Internet
 - Data
- Within Local AT&T's customers can be reporting troubles associated with services provided by a number of ILECs, CAPS, other vendors or even AT&T itself through:
 - Resale
 - Unbundled Network Elements
 - Facilities Based Interconnection
- Only the maintenance of trouble history within the CLEC's own database can allow the CLEC's business processes to function effectively and efficiently.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

- Telephone Number
 - Must also perform visual inspection to insure service address presented from LMOS matches that presented from CRIS and correct LMOS if it is in error.
 - Line In Use Indicator
 - Type of Trouble (a series of menus and sub-menus – see page 4)
 - Reach Number
 - Remarks Regarding the Reach Number if Necessary
 - Access Numbers
 - Referred By Name
 - New Commitment (Appointment) Time
 - Access Hours
 - Out of Service / Affecting Service Indicator
 - Customer Date and Time of Desired Commitment
 - Notes
 - Category Indicator – Customer Direct/Customer Excluded
 - Irate Indicator
 - Customer Comments
 - Additional Narrative for LMOS
 - Date and Time Received
-
- During the creation of the TAFI input the TAFI functionality may / will most likely provide useful information which must be input to the CLEC's system. Examples include:
 - Trouble Description Codes
 - Commitment Date Recommendations
 - Pending Service Order Information
 - Pending Trouble Report Information
 - Test Results
-
- Having created a TAFI trouble report the CLEC now owns that trouble report and must monitor its status and perform all necessary actions to close the TAFI trouble ticket when the trouble is resolved, and the duplicate trouble ticket in their own system.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Please provide and discuss any studies quantifying the additional costs imposed due to lack of integration for repair and maintenance functions.

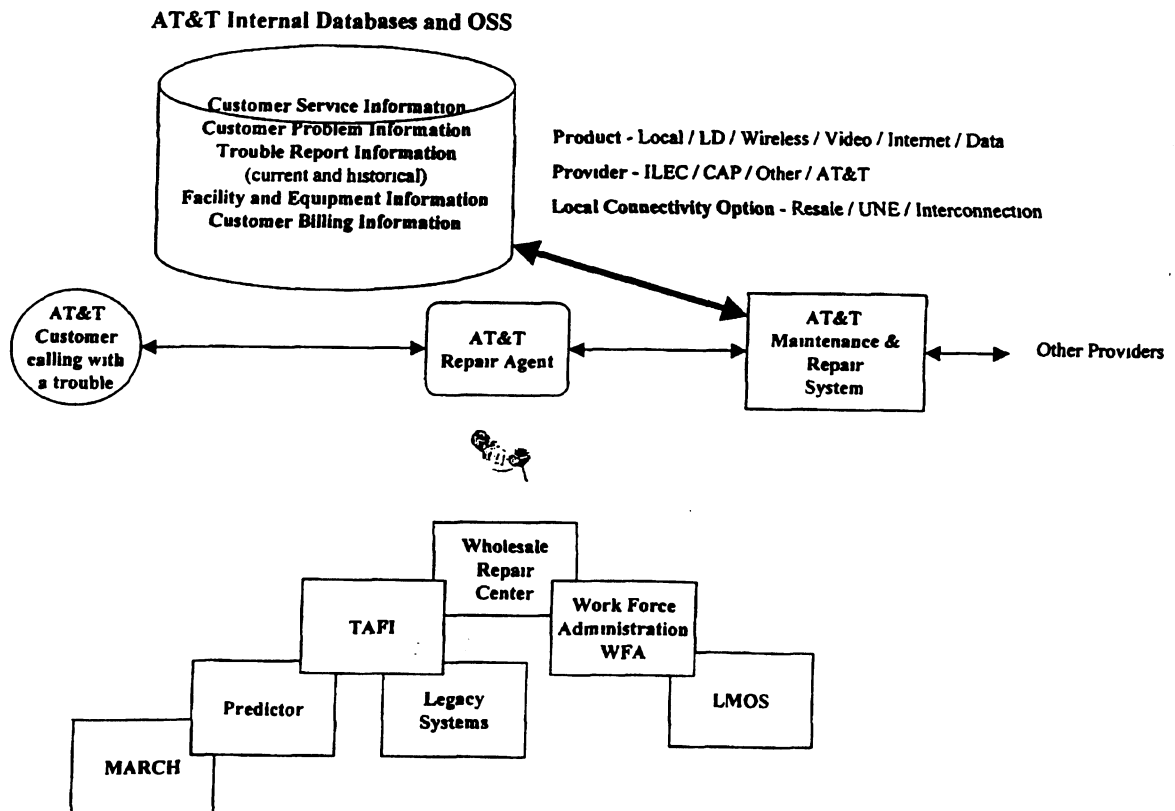
- See Tab 11. In May and June of 1997 AT&T received training on TAFI and conducted a trial of the system comparing functionality and estimating the incremental cost of its use. Four methods of operation were considered.
 - TAFI as a stand alone process
 - TAFI in conjunction with AT&T's Actiview based process
 - AT&T's Standard Process – Actiview + phone call to BellSouth
 - Actiview with Electronic Bonding
- An **additional cost** of 2.4 agents per 100,000 access lines was identified as the penalty for dual entry to TAFI resulting from approximately 3 minutes additional agent work per trouble ticket.
- In contrast Electronic Bonding was estimated to yield a 15 to 19 minute **reduction** in agent work per trouble ticket.
- The additional cost of TAFI, the reduction in cost associated with EBI, and a number of other factors concerning the availability of data to support business unit and regulatory reporting requirements lead to the decision not to implement TAFI even as an interim process. This decision was communicated to BellSouth on July 21, 1997. See Tab 12.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

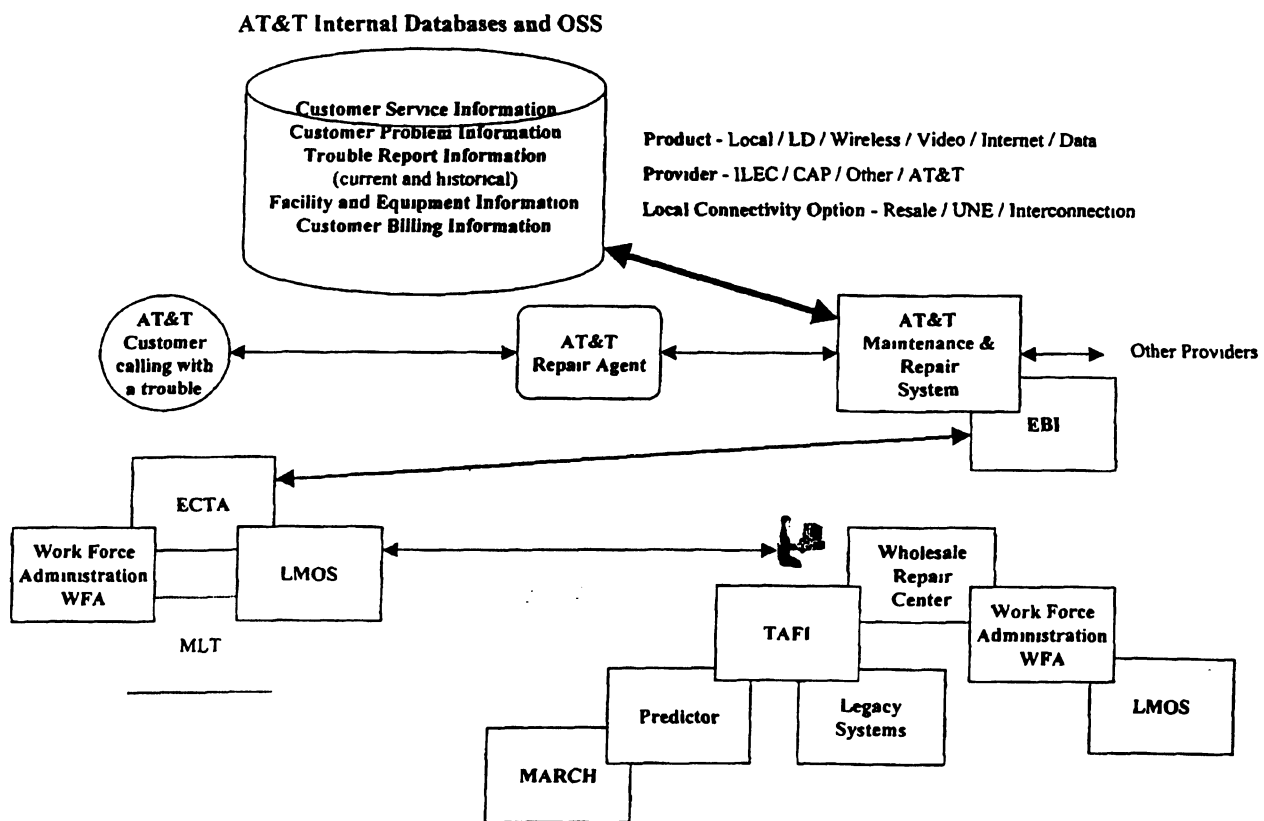
- Remember that the EBI process only allows you to:
 - Enter a report
 - Modify data on an existing report
 - Receive status messages during the life of the report
 - Someone at BellSouth still has to manually “screen” the report to figure out what to do to fix it (Gene Piatkowski, January 28, 1998)
- EBI/ECTA without access to TAFI functionality is conceptually equivalent to non-integrated pre-ordering and electronic ordering without flow-through.

Tab B

AT&T "Standard" Maintenance Process with BellSouth



AT&T "EBI/ECTA" Maintenance Process with BellSouth



Tab C-1

**Electronic Bonding Interface (EBI, a.k.a. ECTA) Negotiation
and Implementation Chronology**

Dates	Activity
3Q 1996 / 1Q 1997	Negotiation dialogues continue BellSouth never produces a specification for TAFI, TAFI functionality via EBI, or EBI for Local Services per the T1M1 Standard In October, AT&T provides BellSouth with our specifications reflecting EBI for Local Services per the T1M1 Standard BellSouth ultimately agrees to begin implementation planning under AT&T's specifications, including the provisioning of a portion of the MLT testing functionality available through TAFI, the initial meeting is held February 26/27, 1997
4Q 1996 / 1Q 1997	Interconnection Agreement negotiations result in agreement to and approval of Attachment 15, "Interface Requirements for Ordering and Provisioning, Maintenance and Repair and Pre-Ordering " All interfaces under this agreement are to be machine-to-machine (Section 4 6) and the interface for Maintenance and Repair is described as EBI (Section 6 2)
March 31, 1997	BellSouth allows direct access to CLEC TAFI (Tab 9)
April 1997	FCC Two Day Forum on 271 Issues Mrs Calhoun responds to Mr Bradbury's question as to if and when BellSouth will provide access to TAFI functionality via EBI by stating that such a capability would be a "violation" of the standard
May 1997	BellSouth commits to implementation of EBI for Local Services per the T1M1 Standards and other requirements provided in AT&T's specifications with testing to begin in October of 1997 Provisioning of full MLT access (and other TAFI functionality) is deferred to "an enhancement in early 1998" (Tab 10, Page 3)
June 1997	AT&T evaluates TAFI as a possible interim interface Additional cost of 2 4 agents per 100,000 access lines is determined to add TAFI to existing process for dual data entry This cost and other considerations (pending availability of EBI, business and regulatory reporting requirements) result in a decision not to utilize TAFI (Tab 11, Tab 12)
3Q 1997 - 1Q 1998	EBI implementation activities continue Both parties encounter delays in the development and testing processes Turn-up in a production mode occurs in February 1998

Tab C-2

DRAFT - Version 2

Book 19 / Tab 2

**AT&T Communications, Inc.
Loop Unbundled w/Interconnection Planning Document
for
Network Services, Network Operations, Billing and CARE,
and Pricing and Compensation
in the
Local Exchange Service Marketplace**

Docket No. 000731-TP
JMB-24
Page 24 of 121

I. Network Operations (Cont'd)

If a full EBI interface is not available, we will need to develop an interim solution. One potential would be for BellSouth to provide a direct interface into the current BellSouth trouble reporting and tracking system which could be accessed from AT&T's work center. Another option could entail a gateway interface. BellSouth could provide AT&T with the interface specifications and AT&T could potentially build a gateway between its existing trouble ticketing system and the BellSouth system. These are just two possible methods of operation, AT&T is more than willing to discuss any viable options presented by BellSouth in response to this Loop Unbundled Resale agreement.

In addition to an electronic interface required to provide "real time" status to AT&T's end-users the use of the AT&T brand is especially important. To that end, AT&T would like to discuss the options for the repair service in connection with provisioning and repairing service to AT&T end-users. It is understood that this is a very sensitive issue and we are willing to work with BellSouth to meet this requirement

B. Maintenance Procedure (Cont'd)

10. BellSouth will report all associated maintenance and service charges at the time the trouble ticket is closed with the AT&T service center.
11. BellSouth and AT&T will negotiate a mutually acceptable escalation and expedite procedure for all services provided by BellSouth under this agreement.
12. BellSouth and AT&T will agree to a trouble priority and process for all trouble reports handled between the two companies.
13. AT&T and BellSouth will negotiate mutually acceptable performance metrics which will apply to the network elements which AT&T leases from BellSouth.
14. BellSouth will provide AT&T with the ability to "pre-screen" any activities which would incur charges to AT&T in order for AT&T to validate the activity. This includes, but is not limited to the dispatch of field forces to an AT&T end-users premises.
15. AT&T requires an established Disaster Recovery plan with BellSouth.
16. BellSouth will provide the AT&T work center with "real time" test results on any AT&T end user service.
17. BellSouth agrees to route repair service calls to the correct service provider (AT&T), with same dialing parity as BellSouth.
18. BellSouth will bill any applicable Time and Materials charges to AT&T, not to the end user.
19. BellSouth agrees to provide a listing of all applicable charges at the time the Trouble Ticket is closed.
20. BellSouth and AT&T agree to discuss the contracting of BellSouth technicians to perform work on AT&T end-user Customer's premises representing AT&T. This includes but is not limited to:
 - a. Providing the contracted technicians with AT&T forms for the end-user
 - b. Providing the contracted technicians with "branded" AT&T "Not at Home" cards
 - c. Providing the contracted technicians with AT&T business cards
 - d. Assuring that the technicians are trained in a non-discriminatory fashion

Tab C-3

Maintenance Procedures

1.B.1.a	<u>Issue Status:</u>		<u>Contacts:</u>	Class :	Start Finish
	Pending	← BellSouth →	Raulerson		
	Obtainable	← AT&T →			
A	BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process Trouble Ticket entry and update capabilities				
B	AT&T needs information on whether contact numbers provided in handbook are dialable from outside the state				
C	<u>BellSouth Interim Plan</u>		<u>Action Item 1</u>	<u>Contact:</u>	
	Interim: BellSouth will provide contact numbers for the appropriate end users centers, see reseller handbook Long Term: BellSouth is evaluating electronic bonding solutions for time & cost; resolution will require forecasts of volume and timing from AT&T.		BellSouth will denote which numbers are accessible outside of state (1/15/96) BellSouth will determine how business repair calls are directed after dialing the 800 number		
	<u>Long Term Plan</u>		<u>Action Item 2</u>	<u>Contact:</u>	
			<u>Action Item 3</u>	<u>Contact:</u>	
E			<u>Action Item 4</u>	<u>Contact:</u>	

Docket No. 000731-TP

JM 3-24

Page 31 of 121

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Proprietary and Confidential Information
 Subject to a BellSouth and AT&T nondisclosure agreement

1.B.1.c

Issue Status

Pending ← BellSouth → Raulerson
Obtainable ← AT&T → Bradbury (Shirley)

Contacts

Class :

Start
Finish:

BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Provide status updates on current "Open" Trouble Tickets.

AT&T wants proactive notification of status (Not necessary if EB)

BellSouth Interim Plan

AT&T's end users will be treated as any other BellSouth customer - until an electronic interface is established, appropriate BellSouth maintenance personnel will call AT&T if necessary (i.e., jeopardies and missed appointments).

Action Item 1

BellSouth will determine if there are any differences between handling of single customers vs large complex customers and will provide any available documentation on the differences. Further discussion is required For national accounts BellSouth uses "SIMS" which has timers for statusing (where does SIMS reside & is it part of EB Confirm that EB provides access into computer EU systems) TAF/VMOS don't have timers like those used by WFA-controlled special services Gee How would BellSouth classify new customers? (lines & revenue)? 1/31/95. Shirley AT&T will provide clarification on classes of customers for which proactive notification is needed

Contact:

Long Term Plan

Action Item 2

Contact:

Action Item 3

Contact:

Action Item 4

Contact:

Docket No. 000731-TP

JMB-24

Page 33 of 121

DRAFT - FOR DISCUSSION PURPOSES ONLY - NON BINDING DOCUMENT

Proprietary and Confidential Information
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A AT&T Initial Resale Expectation	B Clarified Expectation	C BellSouth Resale Plan	D Action Items
--	--------------------------------	--------------------------------	-----------------------

1.B.1.f

<u>Issue Status</u>	<u>Contacts</u>	<u>Class</u> : EC	<u>Start</u> 3/11/96
Pending ← BellSouth →	Messey		
Escalated ← AT&T →	Bradbury (Taber)		<u>Finish</u>

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Provide dispatch status as well as location and ETA.

B Prior to electronic interface, AT&T wants ability to call BellSouth for status

C BellSouth Interim Plan	D Action Item 1	Contact:
Long Term Plan	Action Item 2	Contact:
	Action Item 3	Contact:
E	Action Item 4	Contact:

1.B.1.g

<u>Issue Status</u>	<u>Contacts</u>	<u>Class</u> EC	<u>Start</u> 3/11/96
Pending ← BellSouth →	Messey		
Escalated ← AT&T →			<u>Finish</u> 5/1/96

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Testing

B Expectation applies to SMAS access for special services circuits and MLT access for POTJ

C BellSouth Interim Plan	D Action Item 1	Contact:
Long Term Plan	Action Item 2	Contact:
	Action Item 3	Contact:
E	Action Item 4	Contact:

Docket No. 000731-TP
JMB-24
Page 35 of 121

DRAFT - FOR DISCUSSION PURPOSES ONLY - NON BINDING DOCUMENT

Proprietary and Confidential Information
Subject to a BellSouth and AT&T nondisclosure agreement

1.B.17		Issue Status	Contacts	Class :	Start/Finish
		Pending	← BellSouth → Raulerson		
		Obtainable	← AT&T →		
<hr/>					
A Provide AT&T with an "escalation" and "expedite" process for Maintenance.					
B					
<hr/>					
C BellSouth Interim Plan		D Action Item 1		Contact:	
BellSouth's objective is to provide resellers with the same quality service it provides its end users.		Will be addressed in work center discussions. BellSouth will evaluate template provided by AT&T. BellSouth will provide expedite procedures.			
Long Term Plan		Action Item 2		Contact:	
E		Action Item 3		Contact:	
		Action Item 4		Contact:	

Docket No. 000731-TP
JM 3-24
Page 37 of 121

Tab C-4

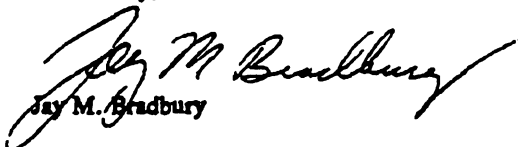
capacities of the existing IXC EB Gateway facilities. AT&T's implementation schedule does not call for the testing or use of local maintenance electronic bonding until late 4Q96 or possibly 1Q97, well after we have entered the local market.

We recommend that BellSouth utilize this additional interval to redesign its interface to provide AT&T with access to the TAFI system, and any future systems BellSouth might deploy, to provide parity for AT&T customers.

During the interim period methods and procedures for a telephonic work center to work center interface which will allow BellSouth to enter and clear AT&T customer's troubles using TAFI can be negotiated. AT&T believes an interim arrangement can be negotiated which will be acceptable to AT&T, more efficient for BellSouth than the LMOS only interface it has designed, and not disadvantage AT&T customers.

At our May 2, 1996, meeting AT&T expects BellSouth to commit to develop and implement for testing on December 2, 1996, a local maintenance electronic bonding interface providing capabilities to AT&T's work centers, including testing, that were on parity with those available to BellSouth's Residence Repair Centers (RRC) and Business Repair Centers (BRC). Further AT&T expects BellSouth to be able to commit to interim telephonic methods and procedures for the interval from the planned start of joint local market entry interface testing on July 1, 1996, until local maintenance electronic bonding is fully implemented.

Yours truly,



Jay M. Bradbury

cc: AT&T Core Team

Tab C-5

On Behalf of BellSouth Telecommunication, Inc. :

William J. Ellenberg, II, Attorney
Douglas Lackey, Attorney
Tom Alexander, Attorney

On Behalf of Cable Television Association of Georgia:

Laura Nix, Attorney

On Behalf of BellSouth Advertising and Publishing Company:

Michael S Bradley, Attorney

On Behalf of MCI Telecommunications Corporation:

David Adelman, Attorney
Marsha Ward, Attorney

On Behalf of Sprint Communications Company, L.P. :

Benjamin Fincher, Attorney
Carolyn Tatum Roddy, Attorney

On Behalf of MFS Intelenet of Georgia, Inc. :

James Falvey, Attorney

On Behalf of ACSI:

James Rice, Attorney

On Behalf of Southern Directory and Georgia Public Communications Association:

Dean R. Fuchs, Attorney

FINDINGS OF FACT, CONCLUSIONS OF LAW AND DECISIONS OF REGULATORY POLICY

Based upon the entire record in this proceeding, including those matters incorporated by reference, the Commission hereby renders the following findings of facts, conclusions of law, and decisions of regulatory policy:

JURISDICTION

Jurisdiction is proper with the Commission and the Commission has authority to render a decision in this matter pursuant to O.C.G.A. § 46-5-164(e) and § 46-5-164(g)

AT&T's petition specifically requests that the Commission (1) establish resale rules, (2) establish the rates, terms and conditions for resale as authorized by the Georgia Act, including the appropriate wholesale rates and the guidelines for operational interfaces, (3) require the initial unbundling of operator services, directory assistance and appropriate routing of repair calls, and (4) adopt the Total Wholesale Service tariff for providing wholesale services to resellers as proposed by AT&T.

The Company's petition rightfully notes that unlike interconnection services, the Georgia Act does not require negotiations to establish the rates, terms and conditions for resale of telecommunications services prior to petitioning the Commission for these purposes. AT&T and BellSouth have engaged in multiple negotiations sessions over a four month period concerning resale and other matters pertinent to local competition in Georgia. AT&T has been unable to reach an agreement with BellSouth that will allow AT&T to enter the local exchange market. The Commission finds that AT&T filed this petition seeking relief from the Commission after unsatisfactory lengthy negotiations with BellSouth.

On March 12, 1996, the Commission issued a memorandum to all parties of record requesting that they submit to the Commission their assessment of the impact of the Federal Act on the Commission's ability to grant the relief sought by AT&T in the manner set forward in the Company's petition and supporting prefiled testimony. Several parties responded to the Commission's request.

The Commission finds that all existing retail services sold to non-telecommunications providers except those services which are presently grandfathered shall be made available for resale. This includes any discounted retail service, discounted package, and new service offerings as they become available. Promotions are not included because they are not tariffed offerings. Grandfathered services shall not be available for resale. These services by definition are no longer available to any new subscription. To allow grandfathered services to be resold would serve to undermine this basic definition. The Commission finds that it shall continue to monitor the grandfathered provision and the offering of special promotions to insure that they are implemented in a way that is consistent with existing Commission policy.

RESTRICTIONS ON RESOLD SERVICES

AT&T advocated that the Commission impose limited restrictions on services resold. All parties presented similar testimony requesting that the Commission adopt certain class of service restrictions and the interLATA joint marketing restriction contained in the Federal Act. Generally, parties agreed that it would be necessary for the Commission to impose a restriction on resale between classes of local service, such as resale of residential local exchange service to business customers. Sprint noted in its prefiled testimony that, "[t]he price differential between business and residential customers would collapse unless resale between these classes is restricted or until local rates are rebalanced to eliminate the differential between business and residential customers." (Tr. at pp. 657-658).

Section 271(e)(1) of the Federal Act provides that until a Bell operating company is authorized to provide interLATA services in an in-region State, or until 36 months have passed since the date of enactment of the Telecommunications Act of 1996, whichever is earlier, a telecommunications carrier that serves greater than 5 percent of the nation's presubscribed access lines may not jointly market in such State telephone exchange service obtained from such company with interLATA services provided by that telecommunications carrier.

The Commission finds that it shall impose class of service restriction on the resale of all retail service offerings. In addition the Commission finds that it shall adopt the interLATA joint marketing restriction contained in the Federal Act.

ATA witness Schwartz recommended that the Commission establish a lower wholesale rate for an extended term agreement than for a short-term arrangement. ATA advocates that "[t]he wholesale rate in an extended resale agreement must reflect the downward pressure on retail price and the upward pressure on marketing and sales costs that will result from increased competition in the local exchange market." (Tr. at pp. 708). MFS and Sprint also recommended wholesale rates be established service by service. Testimony presented by BellSouth and Sprint encouraged the Commission to establish separate discounts for residential and business wholesale services to reflect the current differentials which exist between similar retail offerings.

The Commission finds that the Federal Act standard is the appropriate method to determine avoided cost. The Commission rejects the argument of "net" avoided cost forwarded by several parties. Evidence presented in this docket indicates that TSLRIC studies for the items in question have not been conducted and to do so would require several months. The Commission shall initially use embedded cost information to determine avoided cost as specified in the Federal Act. The Commission further finds that a separate discount shall be determined for each customer class and the discount shall apply equally to all services in BellSouth's wholesale tariff. The Commission finds that negotiated agreements may reflect additional discounts for longer terms.

WHOLESALE DISCOUNT RATE

AT&T and BellSouth were the only parties who presented an avoided cost study in this docket. AT&T's study yielded an overall wholesale discount rate of 28.3%. BellSouth's study resulted in a 11% discount for residential wholesale offerings and a 9.5% discount for business services. MCI, ATA, and COMPTTEL did not conduct their own study, but generally supported AT&T's avoided cost study results. CUC recommended that the Commission establish a floor level discount reflective of the BellSouth cost study results, and maintain a ceiling discount of 20% as ordered by the Illinois Commerce Commission. MFS did not conduct its own study, but cautioned the Commission that deep discounts discourage the beneficial development of facilities-based competition. MFS further stated that BellSouth's estimate of avoided cost are more consistent with the underlying principles of the Federal Act.

A review of AT&T's avoided cost study finds the Company utilizes embedded expense and revenue data which BellSouth reported to the Federal Communications Commission (FCC) in the 1994 Automated Report Management Information System (ARMIS), specifically Reports 43.03 and 43.04. AT&T's cost model removes all or some portion of direct and indirect costs which AT&T believes are avoided when selling services wholesale. The AT&T study shows direct costs avoided as follows: 100% of the cost for uncollectibles, 100% of the expenses associated with marketing, sales, and advertising and billing, and 20% of the Operator-Testing and Operator-Plant Administration expenses. AT&T's study also shows avoided cost to include 100% of operator related costs, such as call completion and number services functions. AT&T maintains that these functions will be performed by the Company's own operators.

AT&T and its supporting parties have taken a broader interpretation of the language in the Federal Act, arguing that avoidable cost is the standard mandated by the recently passed Federal legislation. Under this approach avoidable cost include not only direct cost, but also indirect cost and resulting overheads associated with an avoided job function. AT&T's position supports the inclusion of expenses such as depreciation, administrative expense and corporate overhead to the extent that they are avoidable.

While neither approach is inherently precise, the Commission finds that in this instance a forward-looking avoidable cost approach yields more relevant and reliable results than a historical based avoided cost approach. This view holds particularly true in light of the sweeping changes taking place in the telecommunications industry. ATA witness Schwartz noted, "[i]s it not true that BellSouth has been downsizing and that the very downsizing they're doing should and is being created by competition and resale, and that this cost should be reflected in deriving that avoided cost? I think it's an important issue and I think it's one that should be taken into consideration as part of the wholesale rate." (Tr. at pp. 699). BellSouth's strict avoided cost approach would potentially inhibit or otherwise severely limit the development of a competitive local exchange market. The Commission's endorsement of such an approach would provide BellSouth with little incentive to reduce or shed costs which are actually avoidable. These potentially avoidable costs would continue to be subsidized by the Company's competitors, thereby virtually eliminating any form of meaningful competition.

AT&T's response to CUC's Hearing Request (hereinafter referred to as "AT&T Hearing Resonse"), filed April 1, 1996, reflects the status of the Rochester Telephone Company (RTC) trial where AT&T has ceased marketing its competing local services. On October 3, 1995, AT&T filed a complaint with the New York Commission seeking relief for reasons of price and service provisioning. The Complaint states: "[t]he RTC 5% wholesale discount on local service is precisely such a commercially unreasonable discount. It is noteworthy that the discount is so patently inadequate that only AT&T has even attempted to offer services on a resale basis pursuant to its terms." (Petition of Rochester Telephone Corporation for Approval of Restructuring Plan Case 93-C-0103 N.Y.P.S.C., Petition of Rochester Telephone Corporation for Approval of a New Multi Year Rate Stability Agreement Case 93-C-0033 N.Y.P.S.C., AT&T Communications of New York, Inc. Complaint, Petition For Declaratory Judgement and for Reconsideration of Opinion No. 94-25 N.Y.P.S.C., page 5).

The Commission finds that BellSouth's Avoided Cost Model represents a sound mathematical approach toward computing a wholesale discount. The data utilized to compile the study represents the most recent year-end information available for BellSouth's Georgia operations. The Commission finds that BellSouth does not properly account for certain expenses that are reasonably avoidable. The Commission finds that the data contained in the AT&T Cost Model is dated information and to some degree jurisdictionally mixed. The Commission finds that the AT&T study overstates certain avoidable costs. The Commission finds that it is both necessary and prudent to revise the avoided cost contained in BellSouth's study to determine an appropriate wholesale discount.

The Commission finds that AT&T's request is timely and appropriate in that it is imperative that a reseller have access to the same service ordering provisions, service trouble reporting and informational databases for their customers as does BellSouth. The Commission finds that BellSouth shall establish the requested operational interfaces by July 15, 1996. AT&T's request for an additional 10% discount is denied. The Commission finds that access to these interfaces shall be made available to any requesting party at the same terms and conditions.

DIRECTORIES

AT&T has also requested that the Commission establish certain provisions regarding the maintenance of telephone directories. The Company has specifically requested that (1) BellSouth be required to include basic white page listings for resellers' residential and business customers as well as yellow page listings for business customers, (2) additional or enhanced listings be made available to the reseller at the same rates, terms and conditions as available to BellSouth customers, (3) BellSouth make directory listing data available for purchase so that the reseller can package and brand its own white and yellow page directories and, (4) resellers be afforded the opportunity to place local customer service information in BellSouth's directories.

BellSouth witness Scheye presented testimony that indicates that for all directory matters other than insertion of regular listings in the white pages, arrangement will be made with BellSouth's directory affiliate, BAPCO. The brief filed by BAPCO on April 16, 1996, reflects a similar position. BAPCO appropriately notes: "[t]his Commission historically has not asserted jurisdiction over publishing of Yellow Pages" (BAPCO brief). BAPCO has indicated an express willingness to provide the additional directory arrangements requested by AT&T. MFS, Sprint, MCI, ATA, COMPTel and CUC did not take a position on this issue.

The Commission finds that BellSouth shall include white page listings for all new resellers' customers in its directory. All other directory arrangements requested by AT&T should be pursued with BellSouth's service agent BAPCO.

WHEREFORE, IT IS:

ORDERED that all existing retail services sold to non-telecommunications providers except those services which are presently grandfathered shall be made available for resale. This includes any discounted retail service, discounted package, and new service offerings as they become available. Promotions are not included because they are not tariffed offerings. The Commission shall continue to monitor the grandfathered provision and the offering of special promotions to insure that they are implemented in a way that is consistent with existing Commission policy.

ORDERED FURTHER, that the Commission shall impose class of service restriction on the resale of all retail service offerings. In addition, the Commission shall adopt the interLATA joint marketing restriction contained in the Federal Act


ORDERED FURTHER, that within 30 days of the issuance of this Order BellSouth shall be required to file a separate complete Wholesale Tariff containing the rates, terms and conditions for all services provided. This initial filing as well as proposed revisions shall be subject to Commission approval. All proposed revisions to this tariff shall comply with the existing 30 day filing requirement. BellSouth shall continue to comply with the existing provision in its General Subscriber Service Tariff which requires a 30 day notice to the Commission on all promotional offerings.


ORDERED FURTHER, that the Federal Act standard of retail rates excluding avoided cost is the appropriate bases to determine wholesale rates. The Commission shall initially use embedded cost information to determine avoided costs as specified in the Federal Act. A separate discount shall be determined for each customer class and the discount shall apply equally to all services contained in BellSouth's wholesale tariff. Negotiated agreements may reflect additional discounts for longer terms.

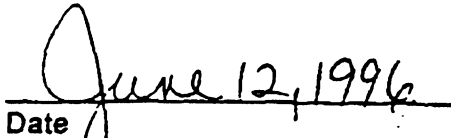
ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

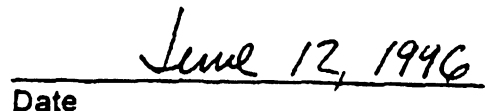
ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper

The above action by the Commission in Special Administrative Session on the 29th day of May, 1996


Terri M Lyndall
Executive Secretary


Dave Baker
Chairman


Date


Date

The Commission finds that it is reasonable to assume that there is a direct correlation between Sales and Product Advertising. BellSouth did not include any product advertising cost as avoidable in their study. The Company incurred product advertising expense of \$17,566,591 for year-end 1995. The Commission finds that in order to remain consistent in its approach, it is appropriate and reasonable to conclude that 75% of the total product advertising cost will be avoided. This yields avoided Product Advertising cost of \$13,174,943. Likewise, a review of the Company's Account Records Categories for Product Advertising (Account 6613) reveals that many of these work functions will be avoided in the wholesale provisioning of services.

Several parties in this docket indicated their intention to utilize their existing operators to provide local operator and call completion services (i.e., 0+, 0-, Directory assistance). BellSouth's study did not include any avoided cost related to Call Completion and Number Services which are expense categories directly related to the provision of operator services. The Commission has included \$3,031,565 in its calculation as avoided cost associated with Call Completion. This represents 25% of the total Call Completion expense incurred by the Company for 1995. Similarly, the Commission has included \$8,281,083 in its calculation as avoided cost related to Number Services. This represents 25% of the total Number Service Expense incurred by BellSouth. The Commission finds that a 25% allocator represents a reasonable initial assignment of cost that will be avoided. Potentially, avoided cost in these areas may grow as competitors' call completion traffic increases.

The final adjustment the Commission made to the BellSouth cost study relates to the assignment of indirect cost which will be avoided. The avoided cost identified in the Company's calculations are all related to directly assignable cost. BellSouth did not reflect any indirect cost such as General Support, Administrative, or Corporate Operations in its study. The total avoided cost included in the Company's study is \$137,126,370. The total direct avoidable expense included in the Commission's calculations is \$170,383,518. The Commission finds that in keeping with its forward-looking approach, it is reasonable to reflect a level of indirect avoidable cost associated with the direct avoidable cost previously identified and calculated.

A review of previous cost studies submitted by BellSouth to the Commission reflect a range for indirect cost as a percentage of direct cost to be 30% to 50%. The Commission finds that it is reasonable to calculate the indirect avoided cost using a 50% factor. This yields an additional avoidable expense of \$85,191,759. This level represents less than 5% of the total expense (\$1,861,747,721) BellSouth deemed unavoidable. The Commission finds that as with all the previous adjustments made to BellSouth's study, this estimate of indirect avoidable cost is extremely conservative. The total avoidable cost (direct and indirect) calculated by the Commission is \$255,575,277.

Tab C-6

BellSouth's Preliminary Report
to the
**Georgia Public Service
Commission**

**Operational Interfaces Between
BellSouth and Resellers**

Docket No. 000731-TP

JMB-24

Page 62 of 121

June 21, 1996

required for the completely mechanized process. Development will require approximately ten months, and will cost approximately \$6 million to \$7 million. BellSouth currently is moving forward with the design phase for this interface. However, with the fact that pre-ordering information is not necessary for the bulk of reseller orders, in addition to the fact that a workable alternative is currently in place, BellSouth should not be required to incur cost of that magnitude unless appropriate arrangements have been made for cost recovery.

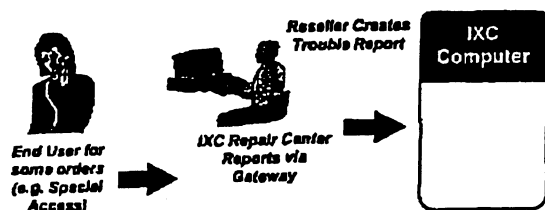
In addition, given the complexities of this implementation, a July 15, 1996 implementation date is not possible. For example, the detailed design phase alone, which began in May, 1996, is expected to take approximately four months to complete, with an associated design development cost of approximately \$500K. The subsequent implementation will require at least six additional months, with an additional implementation cost estimated to be \$5 million to \$6 million. Actual implementation costs and timing will be determined during the design phase. The complexities include ordering and installing hardware for the communication links, development of presentation software to display the information obtained from the databases, and modifying the databases themselves to provide the necessary data to the presentation system. In light of the magnitude of this effort, the rapidly changing technological environment, and to be certain it is providing the best and most cost-effective interface to meet resellers' eventual needs, BellSouth continues to explore alternative solutions that might allow a phased approach to this massive undertaking.

Trouble Reporting

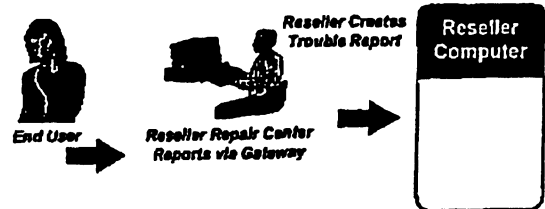
In keeping with its need to accommodate resellers with varying mechanization capabilities, BellSouth is prepared to accept either verbal or electronic trouble reports from resellers. In addition to its plans for accepting resellers' verbal trouble reports in the same centers serving BellSouth's end users, BellSouth has offered resellers an electronic interface for trouble reporting through the same electronic gateway that is now used by IXCs for access

Comparison of Access and Resale Processes for Electronic Trouble Reporting

Access Process



Resale Process



☎ Electronic communication for resale trouble reporting is comparable to the electronic process for access trouble reporting. Reseller also has the option to report verbally, just as IXCs do. Either way, resellers' end users are given the same repair appointment interval as BellSouth's end users.

Transmission Links

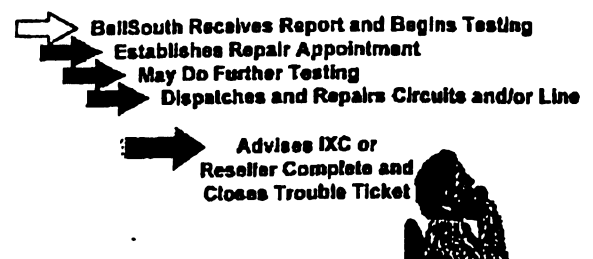
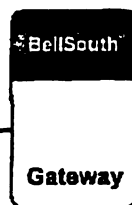


FIGURE 5

Tab C-7

On Behalf of BellSouth Telecommunication, Inc.:

William J. Ellenberg, II, Attorney
Douglas Lackey, Attorney
Tom Alexander, Attorney

On Behalf of Cable Television Association of Georgia:

Laura Nix, Attorney

On Behalf of BellSouth Advertising and Publishing Company:

Michael S. Bradley, Attorney

On Behalf of MCI Telecommunications Corporation:

David Adelman, Attorney
Marsha Ward, Attorney

On Behalf of Sprint Communications Company, L.P.:

Benjamin Fincher, Attorney
Carolyn Tatum Roddy, Attorney

On Behalf of MFS Intelenet of Georgia, Inc.:

James Falvey, Attorney

On Behalf of ACSI:

James Rice, Attorney

On Behalf of Southern Directory and Georgia Public Communications Association:

Dean R. Fuchs, Attorney

ORDERED FURTHER, that with respect to the Pre-ordering category of electronic interfaces:


1. BellSouth is to provide by September 15, 1996 as a part of the Phase I implementation, the LAN-to-LAN access to the Regional Street Address Guide.
2. BellSouth is to provide AT&T by August 15, 1996 as a part of the Phase I implementation, the ability to transfer files of reserved telephone numbers via diskette.
3. BellSouth is to provide AT&T by October 15, 1996 as part of the Phase I implementation, the ability to electronically transfer files of reserved telephone numbers.
4. BellSouth is to provide AT&T by August 15, 1996 the technical specifications and process for what BellSouth describes as Phase II interactive solution.
5. BellSouth is to provide AT&T as a part of the Phase II implementation, BellSouth's proposed Phase II solution by December 31, 1996 but no later than April 1, 1997

ORDERED FURTHER, that with respect to the Ordering category of electronic interfaces:

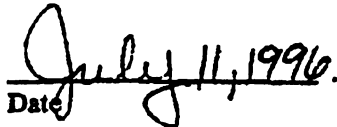
1. BellSouth is to provide AT&T its technical specification and processes for interactive direct order entry by August 15, 1996.
2. BellSouth is to make fully operational and available by December 15, 1996 the Electronic Data Interface capability for receipt and transmission of orders for services in BellSouth's General Subscriber Services and Private Line Tariffs.
3. BellSouth is to implement an interactive direct order entry capability to be fully available by March 31, 1997.

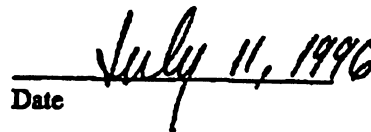
ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering and ruling on the remaining portion of BellSouth Motion for Reconsideration and Clarification and entering such further Order or Orders as this Commission may deem just and proper.

The above action by the Commission in Administrative Session on the 2nd day of July, 1996


Terri M. Lyndall
Executive Secretary


Dave Baker
Chairman


Date


Date


Charles A. Hudak
Attorney at Law
Gerry Friend & Saprnov
Suite 1450 Three Ravinia Dr
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John M Stuckey, Jr
Glass McCullough Sherrill
& Harrold
1409 Peachtree St NE
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Linda L. Oliver
Hogan & Hartson LLP
Columbia Sq.
555 13th St NW
Washington DC 20004-1109

So certified this 11th day of July, 1996

Nancy G. Gibson
3325 Ivanhoe Drive
Atlanta, GA 30327
(404) 231-9134
(404) 651-9401 (GPSC)


Nancy G. Gibson
Special Assistant Attorney General
State Bar No. 293019
Counsel for the Commission Staff

Tab C-8

DRAFT

DRAFT

DRAFT

TECHNOLOGY SPECIFICATION

BELLSOUTH RESELLER INTERACTIVE DIRECT TROUBLE REPORT ENTRY SYSTEM

ACCESS METHOD

BellSouth is building an interface system that allows the Reseller to perform interactive direct trouble report entry. This interface system has several advantages over accessing multiple BellSouth legacy systems individually. It eliminates the need for the Reseller to log into multiple systems in order to complete the interactive direct trouble report entry process. The Reseller is required to log on to BellSouth's system only once. The interactive direct trouble report system takes care of sending and retrieving data from the legacy systems. To complete a trouble report entry, several systems are typically accessed. The output from one system is often the input for the next. By building an interface in front of these systems, the Reseller is freed from manually taking the output of one system and then using it for input to the next. The interface takes care of this automatically, quickly and more accurately than an individual could accomplish without it. The systems BellSouth's repair technicians use employ a similar methodology.

This interface will utilize World Wide Web hypertext screens. This technology is now widely accepted within the industry and offers many advantages over other presentation formats. It allows the Reseller to use various types of terminal equipment capable of running a web browser. This includes PCs, Macs, UNIX workstations, Mainframes, and some non-graphical terminals. BellSouth plans to deploy the interactive direct trouble report system on a BellSouth web server.

CONNECTIVITY

The Reseller has three choices for connecting to BellSouth's web server: LAN-to-LAN, dial-up, and the public Internet. The communication path used will not affect the screens seen by the Resellers. Regardless of the connection choice by the Reseller, the connectivity chosen will support access to the pre-order system, the interactive direct order entry system and the interactive direct trouble report entry system.

If a LAN-to-LAN connection is implemented, the Reseller provisions a single circuit from his LAN to a BellSouth secure router. This router serves as a firewall and directs Reseller traffic directly to the BellSouth web server where the

DRAFT**DRAFT****DRAFT**

PROCESS

The following actions may be taken after the user is connected interactive direct trouble report entry system and has been authenticated. Additional screens and steps will be added as needed during development of the system.

Trouble Entry:

- The user will choose the option to enter a new trouble.
- The user will enter the information into the trouble form.
- The user will submit the trouble report form.
- The system will provide validations, including validations against background systems.
- The system will check for currently reported troubles
- The system will check BellSouth's systems and take corrective actions where appropriate.
- The system will respond to the user with the status, including any currently known troubles, and if corrective actions were taken.
- If the user wishes to place a trouble report with BellSouth, the user may fill in the returned screen and select an option to place a trouble report.
- Otherwise, the user shall select an option to not continue with the trouble report.
- If the user selects the option to place a trouble report, the system will return a trouble report number to the user and place the report into BellSouth's trouble and maintenance systems.

Trouble Status:

- The user will choose the option to get a trouble status.
- The user will enter the trouble report number and submit the form.
- The system will check BellSouth's trouble and maintenance systems and return a status to the user.

Trouble Report Modification:

- The user will choose the option to modify an existing trouble report.
- The user will enter the current trouble report number into the form.
- The system will return limited information about the existing trouble.

Tab C-9

1 **BELLSOUTH TELECOMMUNICATIONS, INC.**
2 **DIRECT TESTIMONY OF GLORIA CALHOUN**
3 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
4 **DOCKET NO. 960833-TP**
5 **AUGUST 12, 1996**
6

7 Q. Please state your name, address and position with BellSouth
8 Telecommunications, Inc. ("BellSouth").
9

10 A. My name is Gloria Calhoun My business address is 675 West
11 Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth
12 Telecommunications, Inc. as a Manager in the Strategic Management
13 Unit. In that position I handle responsibilities associated with
14 operations planning for local competition
15

16 Q. Please summarize your background and experience.
17

18 A. I graduated *summa cum laude* with a Bachelor of Arts degree in
19 Economics from the University of North Florida. In 1995, I completed a
20 management program at the Georgia Tech Management Institute. I
21 began my BellSouth career in 1981 when I joined the Southern Bell
22 Business Marketing organization in Jacksonville, Florida. In that
23 capacity I was responsible for coordinating the interdepartmental efforts
24 needed to implement complex voice systems and associated exchange
25

1 interface allows the ALEC to enter a trouble report, obtain the same
2 appointment interval that would be given to a BellSouth end user
3 customer, subsequently add information to the report itself, check for
4 trouble completion, cancel the trouble report if necessary and perform
5 other trouble administration functions. In response to troubles reported
6 via the gateway, BellSouth will test and initiate repair to the service.
7

8 The similarities between this arrangement and the electronic trouble
9 reporting available for access customers are shown in the figure filed
10 with this testimony as Attachment GC-5. This interface was
11 implemented by BellSouth in 1995 for access services, at AT&T's
12 request. This interface is based on national standards published by the
13 American National Standards Institute (ANSI) and was implemented in
14 accordance with industry guidelines. The ANSI standard defines the
15 transfer of maintenance requests, status and closeout information
16 between two telecommunications providers.
17

18 Q. Please describe the additional capabilities being added to the existing
19 electronic trouble reporting interface.
20

21 A. At AT&T's request, BellSouth is adding the capability for the ALEC to
22 access the same interactive testing sequence that BellSouth follows to
23 screen trouble reports.
24
25

1

2 A AT&T's assertion that BellSouth is unwilling to provide a real-time,
3 interactive, electronic trouble reporting interface is simply not true
4 BellSouth has already provided such an interface. In addition, at
5 AT&T's request, BellSouth has a time-consuming and costly effort
6 underway to provide additional interactive trouble reporting capabilities
7 to ALECs.

8

9 Electronic Interfaces for Customer Usage Data Transfer

10

11 Q In its petition, AT&T claims that BellSouth has been unwilling to make
12 an electronic interface available for customer usage data transfer. Is
13 this true?

14

15 A No, it is not true. BellSouth already has the capability available to
16 electronically provide customer usage detail to ALECs. This option
17 provides detail for billable usage such as directory assistance or toll
18 calls associated with a resold line or a ported telephone number. The
19 usage option allows the ALEC to bill end users at their discretion,
20 rather than on BellSouth's billing cycles. This option also allows an
21 ALEC to establish toll limits, detect fraudulent calling, or analyze its
22 customer usage patterns.

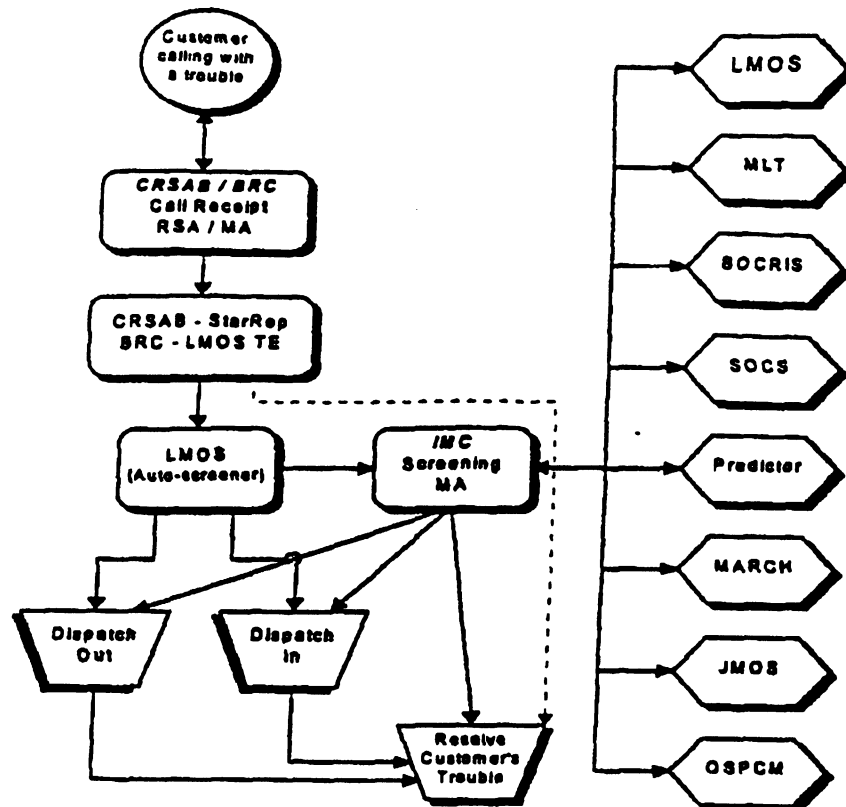
23

24 Q. How long has BellSouth had this electronic interface available?

25

Tab C-10

Customer Contact - pre TAFI



With the introduction of TAFI, the person handling the initial customer contact will resolve all POTS trouble conditions (for those troubles that can be cleared remotely) or route the trouble report to the correct entity for resolution. In other words, the functions performed by the MA in the IMC are now completed by the TAFI user on the initial contact.

This task was accomplished by developing a 'tool' that performs the mechanics of accurately processing the customers' trouble situations. TAFI actually accesses all of the downstream systems, gathers appropriate data, performs specific Central Office translation changes and provides the user with a recommendation / resolution to the problem condition.

Docket No. 000731-TP
JMB-24
Page 90 of 121

8.0 ADDITIONAL DATA WINDOW

TAFI gathers much information from a number of downstream systems during the processing of a trouble report. During the normal flow, TAFI uses this information to develop its recommendation. However, there may be times when you may want to view this information to gain a better insight to a specific problem. This information is found in the "Additional Data Window" and is accessible by depressing F11.

⇒ **Note:** The Additional Data Window is only available if you are processing a trouble report ... because without a telephone number to work on, TAFI doesn't gather any "data".


The Additional Data Window displays the following menu of options:

<i>Test Results</i>	displays the MLT results obtained by TAFI
<i>Ticket Status</i>	LMOS Recent Status Transaction (RST) - used to view the various lines of status on a pending trouble report
<i>BOCRIS CSR</i>	CRIS Customer Service Record - displays the products and services that are programmed on the line
<i>LMOS TR</i>	LMOS Trouble Report - a view of TAFI's interaction with the LMOS TR mask
<i>Predictor</i>	Predictor - the results of TAFI's inquire to Predictor
<i>BOCRIS Pend Order</i>	BOCRIS Pending Service Order - a view of what was ordered in BOCRIS
<i>DATH Trouble History</i>	LMOS Display Abbreviated Trouble History - A trouble history report showing just the close out narrative on previous trouble reports
<i>DLETH Trouble History</i>	LMOS Display Extended Trouble History - A trouble history report showing every line of status on previous trouble reports
<i>DLR</i>	LMOS Display Line Record - displays the customer's Line Record in LMOS
<i>SOCS Pending Order</i>	Service Order Communications System - displays the status of a pending service order
<i>Other SOCS Orders</i>	If the customer has more than one pending service order, this option lets you select which service order to view

Tab C-11

Bradbury, J M (Jay) - LGA

From: jshill@att.com
Sent: Friday, December 18, 1998 4 21 PM
To: bradbury@att.com
Subject: FW: Notes EC Gateway - Local


ECG_LOC2.DOC

MLT

From: Eugene Piatkowski [SMTP: Eugene.Piatkowski@bridge.bst.bls.com]
<mailto:Eugene.Piatkowski@bridge.bst.bls.com>
Sent: May 16, 1997 03:28 PM
To: Hill, Jim
Cc: Maria W Mayo, Linda W Tate
Subject: Notes EC Gateway - Local

Jim,

Attached is a revised draft of the notes addressing issues raised in our February meeting. We discussed these items last week and this document updates our replies. There is one or two open issues we are still working on and will provide you the answers early next week (i.e., how many status entries on a typical report?).
Thanks,
Gene

Attachment

The following Microsoft Word For Windows V6 document is uuencoded. You may use the UNIX uudecode utility to translate it to its native format.

Attachment

<<ECG_LOC2.DOC>>

Notes From AT&T/BellSouth EC-Gateway Local Meetings
—2/26/97, 2/27/97, 5/8/97 & 5/9/97

Docket No. 000731-TP
JMB-24
Page 97 of 121

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Notes From AT&T/BellSouth EC-Gateway Local Meetings
—2/26/97, 2/27/97, 5/8/97 & 5/9/97

A Location Access Hours: BellSouth stores only the current day in LMOS. BellSouth will only dispatch 30 minutes before access is available according to this attribute. AT&T will look at this

BST will populate current commitment. If AT&T sends dates outside of offered commitment, and provides access hours, the report will be available for dispatch-out 30 minutes before the "A" (after) time on the commitment date. Reports that do not require the dispatch of a field technician are not impacted by the access hour window and will be worked as they become available via the MSCR (mechanized screener function)

A Location Access Hours are populated in the "A" and "B" field on the LMOS TR screen. These fields (A/B) should only be populated when a premises visit is required to fix a trouble and access to the network interface is restricted to specific times. BST will store and appropriately react to these access hours remarks - but can not store seven days worth

A Location Access Person: There is an issue as to the Person Name length BellSouth can support

Today, BST stores up to 7 characters. This is constrained by the 100 char maximum in the narrative field in LMOS. BST/AT&T Need to prioritize what is populated in the narrative field. A location access person will be placed in the narrative as long as trouble information is not compromised (i.e., 'see Joe').

Authorization List: Can BellSouth support "denied"? They will check. Does AT&T need to supply authorization on a Create? Jim Hill will check the contract. BellSouth will need to request "no access" time in order to subtract it from outage duration

Once a trouble ticket is submitted, the customer (AT&T) has agreed to BellSouth performing work necessary to repair trouble. LMOS does not accept authorization prior to dispatch or taking line out of service to repair the trouble. The gateway will support authorization denied attribute, and will not reject the transaction (causing the "set or create ticket" to fail)

Called Number: This is not a current field in LMOS. BellSouth will store in the narrative

Correction: The Called Number field is supported in BST's LMOS system

Cancel Requested By Manager: BellSouth will check to see how they would handle a Cancel with work in progress

BST is concerned of the work that is in progress when a cancel is received. A cancel request will be accepted by the Gateway and sent into the narrative field in LMOS as a subsequent report. If IST value (status) of report is DPO (dispatched out), the report can not be closed. If not DPO (i.e., PDO - pending

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Docket No. 000731-TP

JMB-24

Page 99 of 121

Notes From AT&T/BellSouth EC-Gateway Local Meetings
—2/26/97, 2/27/97, 5/8/97 & 5/9/97

Maintenance of Service Charge: This is a billing issue Jim Hill will check if there is a fixed charge in the contract BellSouth will check how they could support this attribute

Billing Issue needs to be investigated by BST for long term solution. Tech will show what was billed and not show T&M.

Techs show that a bill was issued period (by disposition code) on the close out AVC Details of billing come from LCSC

Managed Object Access Hours: BellSouth needs to think about this attribute and determine if and how they can support it.

Request to repair marginal service after normal working hours (i.e., don't swap cable pairs thereby taking the line out of service for some interval of time) is handled with a notation in the narrative

Managed Object Instance: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Attribute supported in the gateway

Manager Contact Person: BellSouth can support a Person Name of 20 characters and a Person Phone of 10 digits

The Person Name will be populated in the LMOS 'Remarks' field and the Person Phone will be populated in the 'Reach Number' field

Outage Duration: "No access" time will be subtracted from Outage Duration BellSouth will need to request "no access" time

BST will not request "No Access", it will report "No Access" Technician in field cannot communicate with the ECG interactively, status is via LMOS IST transaction

*Outage duration is computed as the interval between receipt and clear time minus any no access time
The no access period is computed as the time between when the report was statused no access and when it became available for action (i.e., subsequent report statusing ticket PDO)*

Perceived Trouble Severity: BellSouth will determine "out of service" and "service affecting" conditions from this attribute.

Notes From AT&T/BellSouth EC-Gateway Local Meetings
—2/26/97, 2/27/97, 5/8/97 & 5/9/97

Trouble Report State: BellSouth will support the list of Trouble Report State/Trouble Report Status values supplied by AT&T.

BST will provide AT&T with list of IST values used on trouble reports in JIA

Trouble Report Status: BellSouth will support the list of Trouble Report State/Trouble Report Status values supplied by AT&T

Same as above

Trouble Report Status Time: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

IST transactions from LMOS contain both the Status time and IST values

Trouble Report Status Window: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Based upon no auto-escalation in LMOS, this is supported in the gateway and not used in LMOS. This window will be used to determine if a ticket has been closed in LMOS and needs closure in the GW

Trouble Type: Need to map BellSouth LMOS codes to T1 227 values in JIA BellSouth will reject unknown codes

Gateway will be updated for additional values

TSP Priority: BellSouth will use their own value BellSouth will look at what happens if the value supplied by AT&T does not match their value

The appropriate TSP values are loaded in LMOS for select lines Based upon TSP value, additional weightings (prioritization for repair activity) and provided in LMOS to ensure appropriate responses Differences in TSP values (for a given end-user) will have to be resolved manually Disaster # defined by application to Fed Government Handled same as BST

Functions

Enter Trouble Report (Create): LMOS may have a problem with tickets that were manually entered (fall back reporting) that is bonded later BellSouth will look at this issue

Manual tickets will remain manual through the life of the ticket BST does not support ticket recovery in LMOS - Tickets cannot be electronically bonded in the gateway if it was manually created Ticket would

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Docket No. 000731-TP

JM13-24

Page 103 of 121

Notes From AT&T/BellSouth EC-Gateway Local Meetings
—2/26/97, 2/27/97, 5/8/97 & 5/9/97

6 What type of testing will we perform This will be determined

Begin Stack-Stack on 8/15, Gateway-Gateway on 8/22, End-End on 9/22, Operations Ready Test on 10/10 and Begin Beta on 10/15/97

7 Can AT&T OSS handle Trouble Reports on circuits not identified by a telephone number AT&T will check Is this an issue?

ECG can handle designed/complex & non-designed circuit troubles (identical interface to WFA as used in LXC Gateway) If AT&T can't generate electronically, these will have to be called in to the BST work center

Docket No. 000731-TP

JMB-24

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Page 105 of 121

Tab C-12

1997 Incremental Cost Comparison

	TAFI	Actiview TAFI	Actiview Standard Process	Actiview with Electronic Bonding
Hardware/Software	+ \$50,000	+ \$50,000	\$0	\$0
Process / M&Ps	+ \$8,000 (est)	+ \$8,000 (est)	\$0	\$0
Training	+ \$8,000 (est)	+ \$8,000 (est)	\$0	\$0
CNSC Personnel (Fixed & Variable)	+ \$126,000 - \$323,000	+ \$126,000 - \$323,000	\$0	-0 8 agents/ \$9,000
Total	+ \$192,000 - \$389,000	+ \$192,000 - \$389,000	\$0	-\$9,000

- Volume of customers is approximately 150,000 at year 1997 Current YTD national defect rate is 3.49%.

Mike McDonnell
07/09/97

Page 2

TAFI vs EBI

- TAFI, as described, provides a 30% interval improvement over EBI (4 5 minute)
- TAFI costs \$192,000 - \$389,000 additional to introduce into CNSC
- TAFI does not provide CMD, BMD and Regulatory reporting requirements Those currently are
 - *Speed of Answer - CNSC (Metric reflects the speed of answer for call rcpt in CNSC)
 - *Abandonment Rate - CNSC (Metric reflects the percent of customer calls abandoned)
 - Center Availability - CNSC (Metric reflects the center availability for call rcpt)
 - *Appointments Met (Metric reflects the percentage of ETTR commitments met)
 - *Time to Restore (Metric reflects the Local Service Providers time to restore)
 - *Repeat Troubles (Metric reflects percentage of repeat troubles for CMD / TSR mkt)
 - Resolution Code Analysis (Metric reflects the resolution code analysis for CMD / TSR mkt)
 - Misdirected Telephone Calls (Metric reflects percentage of misdirected calls into CNSC)
 - *Defect Rate (Metric reflects the defect rate per 100 access lines for CMD / TSR mkt)
 - End to End results
- * Indicates PUC and or FCC requirement. (SR/AV must provide metrics for all states)

Tab C-13

Tab C-14

4

1 **BELLSOUTH TELECOMMUNICATIONS, INC.**
2 **REBUTTAL TESTIMONY OF WILLIAM N. STACY**
3 **BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**
4 **DOCKET 8354-U**
5 **MARCH 6, 1998**
6
7 **Q** **PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH**
8 **BELLSOUTH TELECOMMUNICATIONS, INC.**
9
10 **A** **My name is William N. Stacy. I am employed by BellSouth**
11 **Telecommunications, Inc (BellSouth). My business address is 675 West**
12 **Peachtree Street, Atlanta, Georgia 30375. I am the Assistant Vice**
13 **President - Services for the Interconnection Operations department of**
14 **BellSouth Telecommunications, Inc. (BST) In this position, I am**
15 **responsible for development of the procedures used by BST personnel to**
16 **process Competitive Local Exchange Carrier (CLEC) service requests,**
17 **and for assisting the service centers in Interconnection Operations in**
18 **implementing CLEC contracts in a manner consistent with State**
19 **Commissions and the Federal Communications Commission (FCC) rules**
20 **and regulations governing local exchange competition. I have held**
21 **numerous positions with BST in Network Engineering, Operator Services,**
22 **Network Planning and Network Operations.**
23
24 **Q.** **ARE YOU THE SAME WILLIAM STACY WHO PREVIOUSLY FILED**
25 **TESTIMONY IN THIS DOCKET?**

1 A BellSouth completed its development of the ECTA by November 15, 1997,
2 as required by AT&T. Since that time for more than three months, AT&T
3 has continually delayed the implementation of ECTA due to problems with
4 their side of the interface. AT&T has requested weekly delays since the
5 first date change to February 2, 1998, ECTA's current implementation
6 date is March 9, 1998, but that may also be delayed again by AT&T

7
8 Q, MR BRADBURY PROPOSES THAT BELL SOUTH BE REQUIRED TO
9 PROVIDE ACCESS TO TAFI FUNCTIONALITY THROUGH THE EBI
10 INTERFACES. DO YOU AGREE?

11
12 A. No Mr. Bradbury is confusing AT&T's desired business solution for their
13 maintenance and repair functions with BellSouth's requirements to
14 provide parity of access to this functionality for the CLECs. BellSouth retail
15 units utilize TAFI as their primary tool for managing maintenance and
16 repair functions. BellSouth has provided this same interface for the
17 CLECs.

18
19 AT&T's request recognizes that TAFI is superior to the national standard
20 EBI interface, and that adding TAFI's functionality to EBI is a goal worth
21 pursuing, and I agree. However, this is additional functionality over and
22 above BellSouth's legal requirements.

23
24 **RETAIL RATES ON CSRS**

25

1

2 Q Fair enough. On page 40 of your rebuttal
3 testimony --

4 A Yes.

5 Q -- you state at the bottom regarding TAFI that you
6 agree with Mr. Bradbury that adding TAFI functionality to
7 EBI is a goal worth pursuing, is that correct?

8 A That's correct.

9 Q Were you aware that AT&T has been requesting
10 access to TAFI through EBI interface since practically April
11 of 1996?

12 A I will take that subject to check. It's been a
13 number of months, yes.

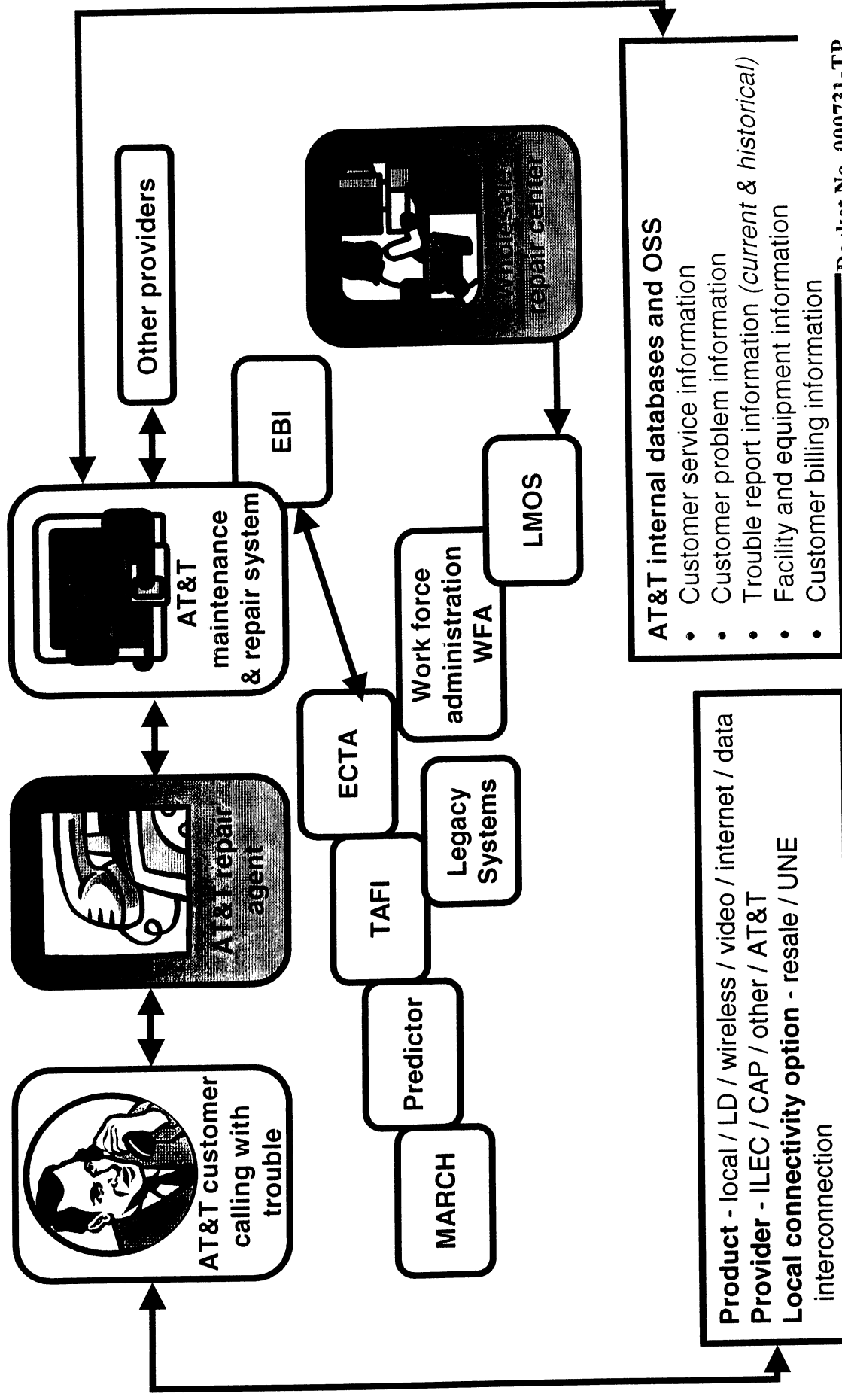
14 Q When will BellSouth be able to provide TAFI
15 functionality through EBI interface?

16 A At the moment I can't give you a definite answer.
17 Whenever BellSouth, AT&T and the standards committee can
18 agree on the transactions to be implemented over that
19 interface, providing it on the BellSouth side of the
20 interface is not nearly as difficult as figuring out what
21 data we're going to send back and forth over the interface.
22 I honestly don't have a good date for that.

23 Q Is there any reason why BellSouth has to wait --
24 Well, BellSouth and CLECs in the southern region, in the
25 southern part of the country have to wait for the standards
26 body to rule on this or could they agree on it themselves?

Tab C-15

Integrated maintenance process with BellSouth





Federal Communications Commission
Washington, D.C. 20554

February 10, 1999

Mr. Sid Boren
Executive Staff Officer
BellSouth Corporation
1155 Peachtree St., N.E., Room 2004
Atlanta, GA 30309

Dear Mr. Boren:

On December 15, 1998, members of the Common Carrier Bureau Staff ("Bureau Staff") met with representatives of BellSouth to discuss interpretations of the Commission's October 13, 1998, BellSouth Louisiana II Order as it might be applied in other states in which section 271 applications might be filed.¹ A summary of the discussion is described below. The Bureau Staff indicated that additional information from BellSouth and interested parties would be useful in order for the Bureau Staff to engage in further discussion. The Bureau Staff also indicated that its views were based on information developed since the issuance of the BellSouth Louisiana II order. The Bureau Staff stated that its views on any of these issues were in no way binding on the Commission, and that no conclusive determination could be made outside the context of an actual Section 271 application and record.

1. Flow-Through.

Issue. Whether BellSouth can exclude complex orders from its flow-through calculations and what level of disaggregation of flow-through is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response The Bureau Staff stated its view that, in principle, complex orders that are manually processed for BellSouth's retail customers could be excluded from flow-through calculations. The Bureau Staff also stated its view that, to the extent BellSouth excludes complex orders from its flow-through calculations, the following information should accompany a future Section 271 application: (1) a clear definition of complex orders for CLECs and BellSouth; (2) a demonstration of how BellSouth handles complex orders for its retail customers and CLECs; (3) evidence that complex orders are processed in a nondiscriminatory manner (i.e., performance results and analysis).

¹ Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-region, InterLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, FCC 98-271 (BellSouth Louisiana II 271 Order).

Mr. Boren

2

The Bureau Staff also stated its view that BellSouth could exclude from its flow-through calculation orders submitted by CLECs that contained CLEC-caused errors. The Bureau Staff stated its view that the flow-through calculation could be adjusted to exclude CLEC errors, if, in a future Section 271 application, BellSouth (1) defines more clearly what constitutes a CLEC error; and (2) verifies the cause of the errors as being CLEC errors (e.g., through an independent audit).

In response to questions about the appropriate level of disaggregation the Bureau Staff indicated its view that the proposed levels of disaggregation listed in the *OSS Model Rules NPRM*² were appropriate.

2. TAFI Integration

Issue: (1) Whether BellSouth must provide a machine-to-machine repair and maintenance interface in order to meet the nondiscrimination requirement. (2) Absent a machine-to-machine repair and maintenance interface, what evidence is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response: The Bureau Staff stated its view that it did not believe that machine-to-machine repair and maintenance interface is *per se* required. The Bureau Staff noted that the Louisiana II Order found that a lack of machine-to-machine interface for repair and maintenance was not *per se* discriminatory. The Bureau Staff stated its view that, absent a machine-to-machine repair and maintenance interface, BellSouth must demonstrate that the interfaces offered to CLECs provide nondiscriminatory access. The Bureau Staff also stated that additional information was needed to assess the competitive impact that results from a lack of a machine-to-machine interface for repair and maintenance. In order to obtain such information, the Bureau Staff indicated that it would schedule additional meetings with interested parties.

The Bureau Staff stated its view that the following information would assist in evaluating in a future application whether BellSouth's repair and maintenance interface provide nondiscriminatory access: (1) a detailed description of the systems and functionality BellSouth utilizes itself for both designed and nondesigned services; (2) a detailed description of the systems and functionality BellSouth offers to competing carriers; (3) a discussion of what interface functionality competing carriers have requested through the change control process and the status of such request, if any; and (4) performance results for resold services and UNEs by interface type.

² See *Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

Mr. Boren

3

3. Retail Analogues/Performance Standards/Statistical Measurements.

Issue. Methods of evaluating whether BellSouth's OSS performance meets the nondiscrimination requirement.

Bureau Staff Response. The Bureau Staff asked BellSouth to propose a framework for evaluating whether it is providing nondiscriminatory access to OSS functions and suggested that BellSouth include the following criteria:

- Relevant performance measurements;
- Identification of retail analogues, including level of disaggregation;
- Identification of a benchmark or performance standard where no retail analogue exists (e.g., based on state approved intervals, engineering studies, or other standards);
- A statistical methodology which is used to compare actual performance results to retail analogues or benchmarks;
- A threshold for determining whether differences in performance are competitively significant and whether analysis of the underlying cause for the difference is needed;
- An open process for analyzing the underlying cause for differences of performance;
- Meaningful penalty amounts to prevent "backsliding."

The Bureau Staff also indicated that it would seek industry comment of any framework for evaluating OSS performance proposed by BellSouth.

4. Complex Ordering/Partial Migration Orders.

Issue. Whether partial migration and directory listing need to be ordered electronically.

Bureau Staff Response. The Bureau Staff stated its view that there is no retail analog for partial migration orders, and that electronic ordering capability is not required at this time. The Bureau Staff stated its view that BellSouth must demonstrate that the ordering process for complex/partial migration orders meets the nondiscrimination requirement (e.g., provides an efficient competitor a meaningful opportunity to compete). The Bureau Staff also stated its

Mr. Boren

4

view that BellSouth should continue upgrading its OSS ordering interface through the change control process.

5. Third-Party Testing - Demonstration of Operational Readiness.

Issue. In cases where there is little or no commercial usage of an interface, whether BellSouth must engage in third-party testing at the level implemented by Bell Atlantic in New York.

Bureau Staff Response The Bureau Staff noted that, in its view, internal testing cannot overcome evidence from commercial usage demonstrating inferior service to CLBCs. The Bureau Staff stated its view that, where there is no commercial usage or inconclusive commercial usage exists, some form of testing is necessary to demonstrate that the BOC's OSS is operationally ready. The Bureau Staff indicated its view that, while it could not conclude, in the absence of a factual record, whether some forms of internal testing or carrier to carrier testing could demonstrate operational readiness, a third party test would serve as a reasonable "safe harbor." The Bureau Staff noted as two examples of such tests underway in New York and Texas. The Bureau Staff stressed the importance, in its view, of a test plan that included input from interested parties and includes meaningful independent review (e.g., State Commission oversight).

For information purposes, a copy of this letter will be placed in all open section 271 dockets.

Sincerely,



Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission

cc: Ms. Magalie Roman Salas
Secretary
Federal Communications Commission



Robert W. Quinn, Jr.
Director - Federal Government Affairs

Suite 1000
1120 20th St., NW
Washington, DC 20036
202 457-3851
FAX 202 457-2545

February 18, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte meeting
Second Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Ms. Roman Salas:

On Wednesday, February 17, 1999, Jay Bradbury, David Eppsteiner, and I, of AT&T, Michael Hou of Community Network, and Karen Reidy and Bryan Greene of MCI, met with Claudia Fox, Jake Jennings, Andrea Kearney, and Claudia Pabo of the Common Carrier Bureau. At the request of Commission staff, the parties reviewed their position of record in this proceeding with an emphasis on the need for a nondiscriminatory machine-to-machine interface for maintenance and repair using the enclosed materials. In sum, we emphasized the dual entry issues (increased errors and cost) imposed with the lack of a machine-to-machine interface that were previously identified by the Commission as the reason machine-to-machine interfaces are required for pre-ordering/ordering functions.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Attachment

cc: Claudia Fox
Jake Jennings
Andrea Kearney
Claudia Pabo



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Docket No. 000731-TP
JMB-27
Page 1 of 8

The Need For A Machine-to-Machine Maintenance and Repair Interface

The Competitive Impact

- If CLECs Hope to Compete With Incumbents, They Must Provide Better Customer Service and Lower Prices
 - All Customer Needs Must Addressed On Each Customer Contact
 - A CLEC Must Be Able To Efficiently Access All of An Individual Customer's Data On Every Call
 - Therefore, CLECs Must Be Able to Access Their Data As Well As ILEC Data

Why A Machine-to-Machine Repair Interface Is Necessary

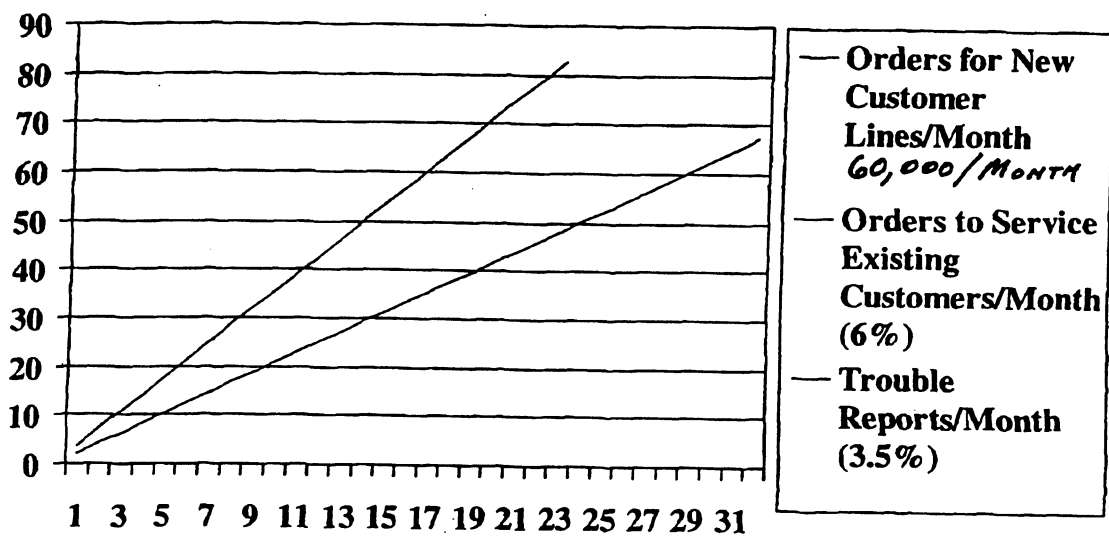
- Billing Data
 - Recurring Repairs Require Customer Credits
- Existing Services
 - Must Be Able to Add/Change Services
 - Must Be Able to Adjust Existing Calling Plans
- CSR Data
 - Necessary to Keep Contact Information Up-to-Date

Why A Machine-to-Machine Repair Interface Is Necessary

- Maintenance and Repair Volumes Will Quickly Equal New Order Volumes
 - Approximately 4% Of Lines Are Treated Monthly
 - 20%-30% of “Non-Migration” Accounts Are Treated Initially
 - Within 2 1/2 Years, Most CLECs Will Be At 1/3 Maintenance and Repair Calls; 1/3 Change Order Calls; and 1/3 New Service Calls

Hypothetical CLEC Business Plan

(7% Penetration of a 25M Line ILEC in 30 Months)



Why A Machine-to-Machine Repair Interface Is Necessary

- M & R Performance Information Is Essential
 - Real Time Access to Call Volume and Connect Time Data is Required for Efficient Staffing
 - CLEC Created Interval and Response Data Necessary to Ensure Parity
 - Without a CLEC's Own Database, CLECs are Left With Monthly RBOC Reports

Additional Cost Incurred Due to Dual Entry

- Lack of Machine-to-Machine Requires CLEC to Engage in Dual Entry
 - Dual Entry Must Occur While Customer Is On-Line for CLEC to Provide Efficient Customer Service Which Incumbent Representative Does Not
 - Dual Entry Is More Time Consuming And Results In More Mistakes, Requiring More Service Representatives