1		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2		REBUTTAL TESTIMONY OF JAY M. BRADBURY
3		ON BEHALF OF
4		AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.
5		AND TCG SOUTH FLORIDA, INC.
6		DOCKET NO. 000731-TP
7		JANUARY 3, 2001
8		
9		
10	Q.	PLEASE STATE YOUR NAME AND ADDRESS.
11	A.	My name is Jay M. Bradbury. My business address is 1200 Peachtree Street.
12		Suite 8100, Atlanta, Georgia 30309.
13		
14	Q.	PLEASE DESCRIBE YOUR CURRENT POSITION AND
15		RESPONSIBILITIES.
16	A.	I am a District Manager in the AT&T Law and Government Affairs
17		organization, and I provide consulting support to AT&T's business units and
18		other internal organizations. In particular, I am involved in the negotiation
19		and implementation of interfaces for operational support systems ("OSS")
20		necessary to support AT&T's entry into the local telecommunications
21		market.
22		

1	Q.	ARE YOU THE SAME JAY M. BRADBURY THAT FILED DIRECT
2		TESTIMONY IN THIS CASE ON NOVEMBER 16, 2000?
3	A.	Yes, I am.
4		
5	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
6	A.	The purpose of my testimony is to respond to the testimony of Ronald M.
7		Pate and W. Keith Milner filed on November 15, 2000. I will address the
8		following issues: 23, 25, 30, 31, and 32. I will correct inaccurate and
9		misleading statements made by these witnesses in their direct testimony. I
10		also will provide additional information in response to BellSouth's position
11		on each of these issues.
12		
13	Q.	IN MR. PATE'S TESTIMONY HE REPEATEDLY ASSERTS THAT
14		CERTAIN ISSUES AND SUB-ISSUES "ARE NOT APPROPRIATE
15		FOR ARBITRATION," IS HE CORRECT?
16	A.	No. Mr. Pate incorrectly asserts that Issues 30 and 31 ¹ and their various sub-
17		issues "are not appropriate for arbitration" and that "AT&T is attempting to
18		circumvent the CCP [Change Control Process]This would allow AT&T to
19		gain an unfair advantage over the other CLECs" Not only is this
20		incorrect, as I will discuss, but this position is inconsistent with testimony
21		given by Mr. Pate in an arbitration proceeding between BellSouth and AT&T
22		in August 2000.

¹ In prior arbitrations, Mr. Pate has also held that Issue 32 is also inappropriate for arbitration although he does not repeat that claim in his direct testimony in this docket.

On page 45 of testimony which Mr. Pate filed in the AT&T-BellSouth
Arbitration in North Carolina, DOCKET NO. P-140, SUB 73 & P-646, SUB
7 (Rebuttal Exhibit JMB-R1). Mr. Pate stated that BellSouth was negotiating
with CLECs, including AT&T, to include compliance with the CCP in
interconnection agreements. Any issue that is appropriate for negotiation and
inclusion in interconnection agreements is also appropriate for arbitration.
BellSouth has shown no reason to treat these issue differently from all of the
other issues that are included in this arbitration and were subject to
negotiation with the intent of inclusion in the interconnection agreement.
Mr. Pate has cited no authority for his position, but one need only look to the
Telecommunications Act of 1996 to determine that it is incorrect.
Telecommunications companies are to negotiate "the particular terms and
conditions of agreements to fulfill the duties" imposed by Section 251 of the
Telecommunications Act, including "nondiscriminatory access to network
elements on an unbundled basis at any technically feasible point on rates,
terms and conditions that are just, reasonable and nondiscriminatory"
Section 251(a)(1) and (c). BellSouth's obligation to provide
nondiscriminatory unbundled access to its OSS necessarily includes the terms
and conditions under which BellSouth may change its OSS. Establishment of
an adequate change management process for OSS systems and processes is
absolutely critical to CLEC success in the marketplace and is a critical

ı	component of Bensouth's provision of non-discriminatory treatment as
2	required by the Act.
3	
4	Not only does the Telecommunications Act clearly require parties to
5	negotiate in good faith all terms and conditions of their business relationship,
6	but it just as clearly requires state Commissions to arbitrate, without
7	exception, all "open" or "unresolved" issues remaining after negotiation.
8	Section 252(b)(1), 252(c). The Act therefore contemplates that issues such as
9	change control and equivalent functionality will be negotiated between the
10	parties and arbitrated by state regulatory commissions should those
11	negotiations fail.
12	
13	It is curious that BellSouth did not raise its concerns about appropriateness of
14	this issue during the negotiation process, where change control and
15	equivalent functionality for ordering and maintenance were frequently
16	discussed. Importantly, it was during the negotiations that BellSouth asked
17	AT&T to provide information on its desired change control process.
18	
19	At least one federal court has upheld the duty of a state regulatory
20	commission to arbitrate all issues presented in an arbitration proceeding. The
21	U.S. District Court for the Northern District of Florida recently reviewed a
22	decision issued by the Florida Public Service Commission in an arbitration
23	between BellSouth and MCI. Order on Merits issued June 6, 2000 in Case

1	No. 4:97cv141-RH, MCI Telecommunications Corporation, et al. vs.
2	BellSouth Telecommunications, Inc., et al. ("MCI Order"). The Florida PSC
3	had refused to address an issue presented by MCI, in part, on the grounds that
4	"the Telecommunications Act authorized arbitration only on 'the items
5	enumerated to be arbitrated in Sections 251 and 252 of the Act, and matters
6	necessary to implement those items." The Florida PSC determined that the
7	matter presented by MCI "was not such an item." (MCI Order at 32.)
8	
9	The federal judge rejected the FPSC's "narrow reading" of the Act's
0	arbitration provisions, explaining that:
1	the right to arbitrate is as broad as the freedom to
2	agree; any issue on which a party unsuccessfully seeks
3	agreement [though negotiation] may be submitted to
4	arbitration
15	(Id. at 33.)
16	
17	Citing Section 252(b)(4)(C) of the Act, the judge further held that when the
18	state PSC undertook the arbitration, it was obligated to decide all issues:
19	When the Florida Commission chose to act as the
20	arbitrator in this matter, its obligation was 'to resolve
21	each item set forth in the petition and the response, if
22	any'.
23	(Id. at 33-34.)

1	Densoun asks this Commission not to resolve the open issue of O55
2	functionality. For the reasons explained above, the Commission should reject
3	BellSouth's unlawful request.
4	
5	As will be discussed further below, BellSouth, not AT&T, is attempting to
6	circumvent the purpose of the Change Control Process and its requirements.
7	BellSouth attempts to utilize the Change Control Process as a shield to
8	protect it from its failures to meet its obligations under the Act and
9	consistently makes unilateral decisions regarding the process, over the
10	protests of the CLEC community.
11	
12	Additionally, BellSouth's argument is inconsistent with its own desire to
13	arbitrate issues that are also covered by region-wide plans. For example,
14	BellSouth has developed its VSEEM performance measures plan which it
15	proposes for region-wide application, yet in various jurisdictions it has also
16	argued that this plan is ripe and appropriate for arbitration because any CLEC
17	in any state could "pick and choose" to buy into the plan. If BellSouth's
18	regional performance measures plan is appropriate for arbitration, it is hard to
19	understand BellSouth's position that the Change Control Process and
20	equivalent functionality for ordering and maintenance are not similarly ripe
21	and appropriate for arbitration.
22	
23	

7		Issue 25: What procedure should be established for AT&T to obtain OS/DA
2		routing for loop-port combinations (UNE-P) using both Infrastructure and
3		Customer Specific Provisioning?
4		
5		Issue 23: Has BellSouth provided sufficient customized routing in
6		accordance with State and Federal law to allow it to avoid providing
7		Operator Services/Directory Assiatance ("OS/DS") as a UNE?
8		
9	Q.	MR. PATE AND MR. MILNER TESTIFY ABOUT BELLSOUTH'S
10		UNDERSTANDING OF ISSUES 25 AND 23. IS BELLSOUTH'S
11		UNDERSTANDING ACCURATE?
12	A.	No. Mr. Pate's testimony on Issue 25 is both confusing and inaccurate, as is
13		Mr. Milner's testimony on Issues 23 and 25. It is difficult to understand why
14		Mr. Pate and Mr. Milner continue to misrepresent AT&T's request and
15		position, since AT&T fully presented its position in my direct and rebuttal
16		testimony and briefs in arbitration proceedings in North Carolina and
17		Georgia. AT&T also has presented BellSouth with specific contract language
18		detailing its requested procedures, yet Mr. Pate and Mr. Milner continue to
19		insinuate that a single "default" routing to "unbranded" OS/DA will meet
20		AT&T's needs. In addition, both Mr. Pate and Mr. Milner claim that
21		electronic ordering for customer specific OS/DA routing is presently
22		available from BellSouth. It is not.
23		

1		As I discussed in my direct testimony on pages 23 through 31, the FCC
2		clearly contemplated use of multiple customized OS/DA routings by ALECs
3		and in its order, instructed BellSouth to accommodate the electronic ordering
4		of such arrangements through the uniform application of regionwide
5		"identifiers." Nevertheless, BellSouth has failed to provide electronic
6		ordering for customer specific OS/DA routing, as discussed on pages 31
7		through 36 of my direct testimony.
8		
9	Q.	HAVE THERE BEEN EVENTS SINCE THE FILING OF YOUR
10		DIRECT TESTIMONY ON THESE ISSUES THAT YOU WOULD
11		LIKE TO BRING TO THE COMMISSION'S ATTENTION?
12	A.	Yes. As I discussed in my direct testimony, BellSouth planned to make
13		electronic OS/DA ordering available on an industry-wide basis in Release 8.0
14		of its ordering software, but in October, BellSouth made the unilateral

of its ordering software, but in October, BellSouth made the unilateral decision to remove the capability from Release 8.0. In the Georgia AT&T/BellSouth arbitration, Mr. Milner testified that BellSouth reinstated that capability. As shown in Exhibits JMB-4, 5, 6 and 7 of my direct testimony, however, this simply is not true. The extremely limited OS/DA ordering capability that BellSouth belatedly attempted to provide was intended to support a very limited AT&T test, and had no commercial applicability. ²

² As discussed in my direct testimony, the "substitute" OS/DA ordering capability planned by BellSouth would have been limited to AT&T's UNE-P trial, in one office, using only one interface (EDI), to provide only "unbranded" BellSouth OS/DA, could not be used with live customers (even by AT&T), and would not support all possible order types.

In their testimony in this docket, however, Mr. Milner and Mr. Pate attempt
to convince this Commission that BellSouth reinstated electronic OS/DA
ordering as originally planned. As stated above, this is not true. BellSouth
has made no attempt to reintroduce the originally-planned capability, and in
fact has been unable to provide even the limited "substitute" test support
capability it attempted to introduce. In its hasty attempt to rescue Mr.
Milner's false Georgia testimony by substituting a form of electronic OS/DA
ordering, however limited, BellSouth provided line class codes for one office
(the 5ESS in which AT&T is conducting its test) but developed the new
software, screening, and lookup tables for another office (a DMS in the same
wire center available to but not being used by AT&T). BellSouth's failed
attempt is documented in the e-mails I have attached as Exhibit JMB-R2 to
this testimony. Thus, in Release 8.0 it is still impossible to electronically
order any form of customized OS/DA routing just as it always has been. ³
Further, a recent filing in Georgia by Mr. Milner reveals that (1) in the real
world it is likely that BellSouth has provided no working OS/DA customized
routing arrangements and (2) the software developments BellSouth is
contemplating associated with electronic ordering of customer-specific
OS/DA routing may be needlessly complex and fail to utilize available
software and processes.

³ Even had BellSouth successfully implemented this limited test ordering capability, such success would not have provided commercial production capability to any ALEC. Additionally, the test capability only would result in routing to "unbranded" BellSouth OS/DA, but BellSouth must provide

1	Q.	PLEASE IDENTIFY MR. MILNER'S FILING IN GEORGIA AND
2		EXPLAIN YOUR CONCLUSION THAT BELLSOUTH HAS
3		PROVIDED NO WORKING OS/DA CUSTOMIZED ROUTING
4		ARRANGEMENTS.
5	A.	On November 21, 2000, Mr. Milner filed with the Georgia PSC an Affidavit
6		in Dockets 6863-U and 7253-U, to "provide the Commission with the most
7		current information concerning unbundled network elements, interconnection
8		services, and resold services furnished by BellSouth. A copy of the Affidavit
9		is attached as Exhibit JMB R-3.
10		Mr. Milner's Georgia affidavit provides volume information for the elements,
11		products and services that BellSouth provides under each of the 14 Section
12		271 Checklist Items within Georgia and across its nine-state region. The
13		discussion of customized routing, which appears in paragraphs 13-15, does
14		not indicate that any customized routing arrangements are in service. Mr.
15		Milner has already testified here in Florida that there are no working AIN
16		arrangements in the nine-state region, which is another possible method of
17		obtaining customized routing. Thus, it certainly appears that BellSouth has
18		provided no working customized OS/DA routing arrangements in its entire
19		region - an appearance which is bolstered by the fact that BellSouth has been
20		unable to document a process for ordering customized OS/DA routing, which
21		AT&T repeatedly has requested.

customized routing to an alternative provider's platform in order if it wishes to engage in market-based pricing of its own OS/DA.

1	Q.	PLEASE EXPLAIN YOUR CONCLUSION THAT BELLSOUTH IS
2		CONTEMPLATING SOFTWARE DEVELOPMENTS FOR
3		ELECTRONIC ORDERING OF CUSTOMER-SPECIFIC OS/DA
4		ROUTING THAT IS NEEDLESSLY COMPLEX AND FAILS TO
5		UTILIZE AVAILABLE SOFTWARE AND PROCESSES.
6	A.	As I explained in my direct testimony, the FCC instructed BellSouth to
7		accept region-wide indicators for ALECs' customized OS/DA routing. Mr.
8		Milner's Georgia Affidavit confirms that BellSouth easily could use Uniform
9		Service Order Codes ("USOCs") as indicators to identify an ALEC's
10		selection of customized OS/DA routing. As Mr. Milner explains in
11		paragraph 17 of his affidavit, BellSouth uses USOCs, Field Identifier Codes
12		("FIDs"), the Line Class Code Assignment Module ("LCCAM"), and a
13		system called MARCH, to assign Line Class Codes ("LCC") to customer
14		specific service requests. This same process could be used to assign LCCs to
15		ALECs' customized OS/DA routing requests. Thus, Mr. Milner's description
16		of the use of USOCs, FIDs and LCCAM by BellSouth confirms my direct
17		testimony at pages 27 through 30. The "indicator" the FCC contemplated in
18		its order, and which AT&T is requesting in this docket, is analogous to a
19		USOC. BellSouth provides USOCs for all other services and elements it
20		makes available to ALECs, and those USOCs are processed by LCCAM
21		whether they are being used by BellSouth or an ALEC.
22		

1		Rather than use USOCs for A1&1's customized OS/DA routing, however,
2		BellSouth proposes a system unique to AT&T's Operating Company Number
3		and RESH code, a specific switch, and specific NPA-NXXs within that
4		switch. These specifications were provided to AT&T on November 10,
5		2000.
6		
7		The methodology proposed by BellSouth clearly does not take advantage of
8		the much simpler USOC-based process used for all other BellSouth and
9		ALEC service requests. Additionally, BellSouth has proposed a system
10		unique to AT&T, to be used for specific NPA/NXXs within that switch, as
11		though AT&T had submitted a bona fide request for an individual process
12		rather than a Change Request for a nondiscriminatory process available to all
13		ALECs. BellSouth was unable to implement this "solution" for one switch;
14		attempting to implement such a process for each requesting ALEC for each
15		switch in which the ALEC plans to do business is unwieldy and unnecessary.
16		
17	Q.	ON PAGES 19 AND 20 OF MR. PATE'S TESTIMONY HE IMPLIES
18		THAT THERE IS NO INDUSTRY STANDARD FOR ORDERING
19		OS/DA ROUTING BUT STATES THAT BELLSOUTH HAS
20		PROVIDED AN ELECTRONIC CAPABILITY TO AT&T. PLEASE
21		COMMENT.
22	A.	As discussed above, Mr. Pate is wrong concerning the availability of
23		electronic OS/DA ordering. Further, his comment regarding industry

standards is irrelevant. Although the use of industry standards can meet the needs of a competitive local exchange market⁴, lack of industry standards does not excuse an incumbent LEC from meeting its obligation to provide nondiscriminatory access to OSS functions.⁵ Similarly, deploying an interface that merely adheres to industry standards is not sufficient to demonstrate nondiscriminatory access. A BOC must provide nondiscriminatory access to its OSS functions irrespective of the existence of. or whether it complies with, industry standards.⁶

10 Q. PLEASE SUMMARIZE YOUR RESPONSE TO MR. PATE'S AND MR 11 MILNER'S TESTIMONY REGARDING ISSUES 25 AND 23.

A. BellSouth has mischaracterized AT&T's position and the FCC's orders regarding customized OS/DA routing. AT&T is entitled to customized routing, and the methods it has requested are reasonable, technically feasible, and anticipated by the FCC. BellSouth has not provided the industry with technology to route OS/DA calls to third party platforms and to take advantage of different (more efficient, less costly) trunking options that might be available to it in different local exchange areas, LATAs and states through a commercially viable, timely and repeatable process.

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

⁴ FCC Ameritech Order ¶ 217; FCC BA-NY Order ¶ 88

⁵ FCC South Carolina Order ¶ 121, n. 362.

1	A.	AT&T asks the Commission to order BellSouth to provide AT&T with
2		specific documented methods and procedures for each of the customized
3		routing methods it purports to offer: unbranded at BellSouth's platform,
4		AT&T branded at BellSouth's platform, and routed to a non-BellSouth
5		platform using the two-part procedure requested by AT&T. The Commission
6		also should require BellSouth to provide AT&T with ordering capability that
7		will allow AT&T to place individual customer orders electronically, utilizing
8		a single region-wide indicator for each routing option. The orders should
9		flow through, and AT&T should not be required to place line class codes on
10		any order, nor should AT&T be required to place any indicator on orders
11		when only one arrangement exists in a given footprint area. BellSouth should
12		be ordered to provide these capabilities within 6 months of the Commission's
13		order.
14		
15		Further, until such time as BellSouth can demonstrate that it is offering, as a
16		practical matter, customized OS/DA routing to alternative providers, it should
17		be required to continue provided its own OS/DA services to ALEC as a UNE
18		at UNE prices.
19		
20		
21		Issue 41: Should the Change Control Process be sufficiently
22		comprehensive to ensure that there are processes to handle at a minimum

the following situations:

⁶ FCC Louisiana II Order ¶ 137.

1		Issue Matrix
2	a)	introduction of new interfaces;
3	<i>b)</i>	retirement of existing interfaces;
4	c)	exceptions to the process;
5	d)	documentation, including training;
6	e)	defect correction;
7	Ŋ	emergency changes;
8	g)	an eight step cycle, repeated monthly;
9	h)	a firm schedule for notifications associated with changes initiated
10		by BellSouth;
11	i)	a process for dispute resolution including referral to state utility
12		commissions or courts;
13	j)	a process for escalation of changes in process.
14		Other Concerns
15	<i>k)</i>	Testing Support and Testing
16	I)	Provision of a Trouble Number for Type 1 Events
17	m)	The Ability of BellSouth to Unilaterally Cancel or Reject an ALEC
18		Request
19	n)	Change Review – Prioritization – Release Package Development
20		and Approval
21	o)	The Process of Changing the Process.
22		
23		

1	Q.	ON PAGE 23 MR. PATE SUGGESTS THAT THE COMMISSION
2		SHOULD ONLY GIVE GUIDANCE ON THESE ISSUES, RATHER
3		THAN ORDER SPECIFIC CHANGES, IN ORDER TO AVOID
4		STATE-TO-STATE CONFLICTS. DO YOU AGREE?
5	Q.	No. In order for the change control process to become legally binding upon
6		BellSouth and subject to effective regulatory oversight, this Commission
7		must specifically order BellSouth to adopt the changes requested herein, and
8		should specifically place the Change Control Document under its
9		supervision. It should be no more difficult to avoid state-to-state conflicts
10		regarding this process than any other process incorporated into an
11		Interconnection Agreement or into BellSouth's Statement of Generally
12		Available Terms and Conditions ("SGAT"). If this Commission adopts
13		BellSouth's preferred approach, however, the Change Control Process will
14		continue to be subject to BellSouth's sole control.
15		
16	Q.	IN ARGUMENTS AGAINST ARBITRATING THIS ISSUE, MR.
17		PATE MAKES NUMEROUS ASSERTIONS THAT AT&T IS
18		ATTEMPTING TO "CIRCUMVENT THE COLLABORATIVE
19		PROCESS." IS THIS TRUE?
20	A.	No. AT&T is entitled to arbitrate this issue, as I have demonstrated above.
21		Mr. Pate mischaracterizes AT&T's actions and paints a misleading picture of
22		the level of collaboration that exists today regarding the CCP. As BellSouth
23		is well aware, AT&T and other ALECs continue to work with BellSouth to

1	improve the CCP. Notably, Mr. Pate never states that AT&T is the sole
2	ALEC requesting changes such as those sought in this arbitration.
3	
4	BellSouth, not AT&T, has circumvented the process by consistently making
5	unilateral decisions regarding the process, over the protests of the ALEC
6	community. In fact, other ALECs have expressed dissatisfaction with
7	BellSouth's Change Control Process, which is not as collaborative as
8	BellSouth attempts to portray. See, for example, Rebuttal Exhibit JMB-R4,
9	which includes MCI and Sprint e-mails indicating disagreement with
10	BellSouth's establishment of a three month trial period for the I-CCP, the
11	definition of defects and several other processes BellSouth had proposed.
12	The e-mails also indicate MCI and Sprint's concurrence with AT&T's
13	objection to BellSouth's reclassification of "defects" as "features". I have
14	also attached minutes of the March 23, 2000 Steering Committee meeting,
15	which lists eight items regarding which ALECs had expressed concerns
16	(retirements, testing, documentation, notification methods, the expedited
17	process, intervals for process steps, the definition of a defect, notification
18	contents). As shown in the minutes, these items were not addressed during
19	the meeting, but were instead deferred until future meetings. Many of these
20	issues are still under discussion today. Rebuttal Exhibit JMB-R5.
21	

1	Q.	CAN YOU PROVIDE EXAMPLES OF INSTANCES IN WHICH
2		BELLSOUTH FAILED TO FOLLOW ITS OWN CHANGE
3		CONTROL PROCESS?
4	A.	Yes. I will provide four examples of instances in which BellSouth failed to
5		follow the Change Control Process, although there are many more.
6		
7		1. Issue 9G Business Rules: On August 30, 2000, BellSouth released
8		Issue 9G of BellSouth's Business Rules for Local Ordering ("BBR-LO"),
9		which it admits includes significant changes that BellSouth did not submit to
0		the CCP. (Direct Exhibit JMB-12.) Because BellSouth circumvented the
11		CCP, CLECs were unable to make the required coding and process changes
12		by the proposed October 2, 2000, implementation date. BellSouth
3		nevertheless refused to withdraw these unapproved changes and implemented
4		the software changes on October 2, 2000. In addition to rejecting the
15		previously valid ALEC orders impacted by these unilaterally imposed
16		changes, BellSouth's software release also contained coding errors that
17		caused the rejection of other types of ALEC orders. BellSouth ultimately
18		corrected these additional errors and ALECs and BellSouth utilized manual
19		workarounds until that ALEC coding could be accomplished.
20		
21		2. Unilateral Changes to Ordering Software: In my direct testimony I
22		provided an example of how BellSouth unilaterally decided to remove
23		electronic OS/DA ordering functionality from Release 8 of its ordering

software, in flagrant violation of the Change Control Process. Since that time, BellSouth has unliaterally decided to make other changes to Release 9 and Release 10. At the November 13, 2000, Release 9 User Requirements Meeting, BellSouth announced that three features based on ALEC change requests and previously scheduled for Release 9 would not be included in the scope of the release, that it was probable that not all of them would even be in Release 10, and that Release 11 was yet to be scheduled. Further, BellSouth revealed that its implementation of UNE to UNE migrations (per its selfinitiated CR-0030) would include only the capability to migrate from UNE-P to a UNE loop without number portability, the least likely scenario, and that if any other capability was desired, a new change request would have to be submitted. Exhibit JMB-R6 provides the minutes of the meeting, the associated change requests, and correspondence between AT&T and BellSouth related to the UNE to UNE migration feature. BellSouth has not responded to AT&T's December 15, 2000, change request to obtain the UNE-P to loop with number portability migration capability that meets ALEC business needs. Release 9 now contains no ALEC initiated change request implementations, and the UNE to UNE capability being provided has little practical value to ALECs.

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3. Preferential Treatment of BellSouth-Initiated Change Requests:
BellSouth recently implemented several software changes on a preferential basis, without following the Change Request Process. As shown in Exhibit

JMB-R7, (a November 13, 2000, e-mail from Change Control to the ALECs
forwarding BellSouth- initiated change requests 216, 217, 218 and 219),
BellSouth submitted four "Type 4" (BellSouth initiated) change requests on
November 13 th BellSouth targeted these changes for implementation in
November 2000, in violation of the Change Control Process. None of the
requests were scheduled for or subject to a prioritization review, as is
required for all non-defect change requests. Various CCP log entries reflect
that change requests 216, 218, and 219 were implemented as of December
20, 2000. ⁷ Only fixes for defects are entitled to this "fast track" treatment,
yet BellSouth treated its own change requests in this preferential fashion.

4. AT&T's Requested CCP Changes: BellSouth's handling of requests to change the process following the August publication of Version 2.0 also reflects its ability to ignore the Change Control Process. As discussed in my direct testimony, AT&T requested consideration of specific changes to the Change Control Process, in accordance with procedures specified by the Process (Exhibit JMB-10). According to the CCP, this request should have been discussed during Monthly Status Meetings. BellSouth refused to do so, however, and instead established a separate series of CCP Process Improvement meetings, as discussed below.

On September 9, following the procedures outlined in Section 9 of Version 2.0 of the CCP, AT&T submitted a change request to modify the change

⁷ I was unable to find any record of 217 on the CCP Web Site.

1 control process. This Change Request is referred to as "CR 171". Section 9 2 of the CCP requires such a change request to be discussed at the next 3 monthly Status Meeting, which was scheduled for September 27, 2000. 4 Rather than comply with the CCP, BellSouth refused to address AT&T's 5 change request at the Status Meeting, and instead established a separate 6 meeting to discuss it, called the "CCP Process Improvement Meeting", 7 (Exhibit JMB-R8, September minutes) to be held on October 17, 2000. 8 At the October 17th Meeting, BellSouth introduced and entertained discussion 9 10 of a number of other items related to changes that might bring about 11 improvement of the CCP process and suggested that AT&T and the CLECs 12 hold an yet another additional meeting to discuss AT&T's change request 13 before the next CCP- Process Improvement Meeting on November 1, 2000. 14 Exhibit JMB-R9 (October Minutes). 15 On October 27, 2000, AT&T and the CLECs (as well as invited BellSouth 16 17 representatives) held the separate meeting suggested by BellSouth. During 18 this meeting, all of the CLECs present reached agreement on the language in 19 AT&T's Change Request. At the November 1 meeting, however, BellSouth once again effectively deferred meaningful discussion of CR-171 until a 20 21 meeting to be held on December 7, 2000. Exhibit JMB-R10 and Exhibit JMB-R11 are the minutes of the AT&T/CLEC October 27th meeting and the 22 November 1st meeting. The Red-line Version 2.0 of the CCP document 23

1	referred to in both minutes is identical to my direct Exhibit JMB-10 and
2	includes the language agreed to by all CLECs participating in the October
3	27 th meeting.
4	
5	On November 5, 2000, AT&T provided BellSouth with a document that
6	shows the language to which the CLEC community agreed on November 1,
7	2000. (Direct Exhibit JMB-10). BellSouth was a participant in both the
8	October 27 th CLEC meeting, and the November 1 st CCP Process
9	Improvement Meeting, and had the latest AT&T/CLEC proposal in its
10	possession more than 30 days before the scheduled December 7 CCP Process
11	Improvement Meeting. However, BellSouth did not respond in any way until
12	5:55 PM on December 5, 2000 - effectively one day before the meeting – at
13	which time it produced a significant and substantial mark-up of the October
14	27 document to which the CLECs had concurred. BellSouth's response is
15	Exhibit JMB-R12
16	
17	During the December 7 th meeting, BellSouth allocated three hours to a
18	discussion of this issue. Not surprisingly, the discussion did not conclude on
19	the 7 th and the issue will now next be discussed on January 10, 2001 – four
20	months after AT&T submitted its change request.
21	

1	BellSouth's self-initiated CCP-Process Improvement Meetings may be well
2	intentioned, and may be a useful process, but they are not part of the
3	documented process. AT&T notes the following regarding the meetings:
4	
5	1. Full consideration of AT&T's CR 171, submitted on September 9,
6	2000, has been delayed by at least four months.
7	2. Although BellSouth appears to have agreed to various changes to the
8	CCP during these meetings, those changes have not been documented
9	in a change request nor has the CCP itself been updated to reflect
10	those changes, .as required by Section 9 of that document.
11	3. There is no documented process for resolving issues via the CCP
12	Process Improvement Meetings.
13	
14	Thus, BellSouth has successfully re-instituted the ad hoc process that the
15	CCP was designed to avoid, and which resulted in the irregular adoption of
16	Version 2.0 in the first place. Once again, BellSouth has demonstrated its
17	unique ability to circumvent the process requirements due to lack of any
18	binding commitment.
19	
20	These examples explain why AT&T has asked the Commission to arbitrate
21	this issue. ALECs have no recourse if BellSouth fails to follow the Change
22	Control Process, and BellSouth has no incentive to follow it.
23	

1	Q.	WHY DOES AT&T OBJECT TO BELLSOUTH'S REFUSAL TO
2		FOLLOW THE CHANGE CONTROL PROCESS?
3	A.	BellSouth's unique ability to ignore the process delays work on ALEC needs
4		and limits the overall usefulness of the Change Control Process. Every single
5		one of these "out of process" actions are costly to ALECs, who must
6		repeatedly beg BellSouth to provide them with competitive functionalities,
7		must program their systems for capabilities that may or may not be provided
8		as promised, and must constantly revise business plans in response to
9		BellSouth's unilateral decisions. Additionally. BellSouth has ignored the
10		process when it wants to "cut in line" ahead of ALECs to implement changes
11		that benefit BellSouth alone, which clearly is anticompetitive.
12		
13	Q.	ON PAGES 28-29 MR. PATE ADMITS THAT BELLSOUTH HAS
14		NOT BEEN ABLE TO OBTAIN INDUSTRY AGREEMENT ON THE
15		CCP AND THAT INSTEAD THE INDUSTRY AGREED TO A THREE
16		MONTH TRIAL. WHAT IS THE STATUS OF THE CCP NOW?
17	A.	The future of the CCP was discussed at both the July 26 and August 23, 2000
18		monthly status calls. Although the meeting agenda called only for a
19		discussion, BellSouth forced a "vote" on "baselining" the process during the
20		August 23 call. As is noted in the E-mails in Rebuttal Exhibit JMB-R13, a
21		number of CLECs had left the call, not knowing that BellSouth intended to
22		hold a vote, and at least one other CLEC was represented by a person not
23		authorized to participate in such a vote. Further as noted in the minutes of

1		the call (Rebuttal Exhibit JMB-R14), a portion of the "baselined" document
2		was actually a BellSouth draft with which CLECs had not concurred.
3		
4		Despite these irregularities. Version 2 of the Change Control Process, dated
5		August 23, 2000, is now in effect and has replaced the Interim Versions 1.4,
6		1.5 and 1.6. CLECs have asked for another vote, but BellSouth has refused
7		to revisit the issue.
8		
9	Q.	HAS BELLSOUTH COMPLIED WITH THE REQUIREMENTS OF
10		THE INTERIM PROCESS DESCRIBED IN VERSIONS 1.4 – 1.6 AND
11		THOSE OF VERSION 2.0?
12	A.	No. I have provided examples above of BellSouth's failure to comply with
13		the process in my description of the recent prioritization/release package
14		cycle, BellSouth's out-of-process handling of certain change requests, and the
15		August 23 "baseline" vote. Additionally, in my direct testimony I discussed
16		BellSouth's release of Issue 9G of BellSouth's Business Rules for Local
17		Ordering ("BBR-LO") which it admits includes significant changes that
18		BellSouth did not submit to the CCP.
19		As discussed above, BellSouth's handling of change requests and other items
20		related to changing the process since the publication of Version 2.0 illustrate
21		BellSouth's disdain for following established processes.
22		

1	Q.	ON PAGE 30 OF HIS DIRECT TESTIMONY, MR. PATE DISCUSSES
2		THE NEW CCP PROCESS IMPROVEMENT MEETINGS YOU
3		HAVE REFERRED TO ABOVE AS EVIDENCE OF BELLSOUTH'S
4		WILLINGNESS TO CONTINUE TO "ENHANCE THE PROCESS TO
5		BEST SERVE THE ALEC COMMUNITY AS A WHOLE." PLEASE
6		COMMENT.
7	Α.	As I mentioned above, these meetings were initiated by BellSouth in
8		response to AT&T's change request, and in violation of Version 2.0 of the
9		CCP. AT&T does not believe it is necessary to establish a separate process
10		for discussing issues that are supposed to be handled according to the existing
11		Change Control Process - particularly when BellSouth had just forced
12		Version 2.0 of the CCP into place.
13		
14	Q.	ON PAGES 44-47 OF HIS TESTIMONY, MR. PATE DISCUSSES THE
15		PRIORITIZATION MEETING, THE RELEASE PACKAGE
16		MEETING, THE ACTIVITIES IN THE INTERVAL BETWEEN THE
17		TWO, AND SUBSEQUENT ACTIVITIES LEADING TO
18		IMPLEMENTATION OF A CHANGE REQUEST. IS HIS
19		DESCRIPTION ACCURATE?
20	A.	No. On page 45 Mr. Pate indicates that in the interval between the
21		Prioritization Meeting and the Release Package Meeting that BellSouth
22		"provides requirements and the technical references to the ALECs" and
23		conducts face-to-face meetings or conference calls "to discuss the

1 programming and coding details for the changes." Mr. Pate is wrong. 2 BellSouth has never conducted these activities during this interval despite 3 ALEC's repeated requests that they do so. The e-mail at Exhibit JMB-R6 4 above discusses BellSouth's failure to do so prior to its recent publication of 5 the Release 9 specifications on November 13, 2000. Release 9 will now 6 contain a feature that will be virtually useless as opposed to the feature that the ALECs needed. The CCP doesn't require the actions Mr. Pate discusses, 7 8 and BellSouth doesn't perform them. 9 10 Similarly, Mr. Pate implies that BellSouth and the ALECs "jointly create the 11 Approved Release Package." While this is indeed the desired outcome, in 12 practice, BellSouth simply dictates the contents of the release. 13 14 On pages 46 and 47 Mr. Pate describes a notification letter process and states 15 that: "These letters are not intended to be technical references for use by 16 ALEC software developers. As discussed previously, BellSouth provides 17 ALECs with this information through other sources well in advance of the 18 formal notification." This simply isn't the experience of the ALECs since the 19 creation of the first process document in 1998. KPMG recently posted 20 Observation 21 to the Florida PSC Web Site dealing with this very subject; 21 KPMG observed that "The distribution of Carrier Notification information 22 associated with the BellSouth Change Control Process is not adequate. 23 Furthermore, in BellSouth's implementation of the process, significant

1		information is not included in the Carrier Notifications." There is no
2		consistent process that provides ALECs with this type of information in a
3		timely manner; and thus AT&T seeks the notification processes described on
4		page 22 of Exhibit 10 to my direct testimony.
5		
6	Q.	IN HIS DISCUSSION OF NEW INTERFACES MR. PATE MAKES A
7		DISTINCTION BETWEEN "INTRODUCTION" AND
8		"DEVELOPMENT" OF NEW INTERFACES. DOES THE CCP
9		INCLUDE ANY SUCH DISTINCTION?
10	A.	Mr. Pate states that the "introduction" of new interfaces is subject to the CCP
11		but "development" of those interfaces is not. This distinction is not
12		supported by the CCP itself, which refers only to "introduction" of interfaces.
13		
14		BellSouth makes this distinction because wants to exclude development of
15		new interfaces and processes from the CCP (as did old EICCP). BellSouth's
16		continued exclusion of the development of new interfaces and processes from
17		the CCP guarantees repeated deployment of interfaces and processes that do
18		not meet the needs of the ALECs and are wasteful of the industry's limited
19		resources.
20		
21		On pages 48, 49 and 50 of his testimony, Mr. Pate attempts to justify
22		BellSouth's actions using excuses that are both flimsy and downright
23		paranoid:

1		"BellSouth must have flexibility to develop interfaces to meet
2		industry standards and regulatory requirements."
3		"new development is too critical to risk being stymied in the process
4		by ALEC disagreement."
5		"the nature of the CCP is such that if developing interfaces were
6		included in the CCP. ALECs with no intention of using such
7		interfaces could game the process by voting for additional features
8		and functionality that would increase the time and cost to BellSouth
9		and rival ALECs to implement them."
10		
11		This Commission should turn a deaf ear to such excuses, for which BellSouth
12		has provided no basis in fact. ALECs - the customers of BellSouth and the
13		ultimate beneficiaries of the Change Control Process - must be accorded an
14		opportunity to participate in the development of interfaces and processes that
15		will serve them.
16		
17	Q.	YOU HAVE STATED THAT BELLSOUTH'S EXCLUSION OF NEW
18		INTERFACES GUARANTEES REPEATED DEPLOYMENT OF
19		INTERFACES AND PROCESSES THAT DO NOT MEET THE
20		NEEDS OF THE ALECS AND ARE WASTEFUL OF THE
21		INDUSTRIES LIMITED RESOURCES. CAN YOU PROVIDE
22		EXAMPLES?

1	A.	Yes. AT&T's customers have been victimized by BellSouth's secretive
2		development of new OSS interfaces, specifically, BellSouth's Local Number
3		Portability Gateway ("LNP-GTWY") and the processes supporting local
4		number portability ("LNP"). I will provide two examples.
5		
6		Caller ID Display Failure: Dillard's Department Stores purchases local
7		services from AT&T at many of its locations in BellSouth's nine-state region
8		including Florida. Like most businesses, Dillards kept the same telephone
9		numbers that it used when its local service was provided by BellSouth.
10		Shortly after converting local service to AT&T, Dillards and AT&T
11		discovered that the Dillards name was not displayed on customers' Called ID
12		units when employees called them. This was highly unsatisfactory to
13		Dillards, because many people simply will not answer the telephone unless
14		they know who is calling. This problem, and the resulting dissatisfaction of
15		AT&T's customer, could have been avoided had BellSouth's new Local
16		Number Portability Gateway and new processes supporting local number
17		portability ("LNP") been developed and introduced through the CCP.
18		
19		This problem still has not been resolved to AT&T's satisfaction. Upon
20		urging by AT&T, BellSouth provided a database "fix" for Dillards, and
21		proposes a software interface connection as an interim solution to the
22		underlying problem. AT&T objects to the interim solution, which would
23		require AT&T and other CLECs to spend software development dollars on a

1	"throw away" project. Moreover, BellSouth refuses to provide the temporary
2	database "fix" for any additional telephone numbers "until AT&T has
3	returned the completed forms necessary to allow BellSouth to begin the
4	implementation of the [interim] mechanized solution". Exhibit JMB-R15.
5	As I stated above, these problems could have been avoided had BellSouth
6	developed and introduced the new gateway and processes through the CCP.
7	
8	Erroneous Number Reassignment: AT&T's customers also are being
9	negatively affected by another defective process associated with local number
10	portability that should have been avoided by open discussion in the CCP.
11	When numbers are "ported away" from BellSouth to a CLEC, BellSouth
12	must continue to account for the status of that number in its ATLAS
13	database. AT&T and a number of its customers have found out the hard way
14	that BellSouth returned many ported numbers to an assignable status in
15	ATLAS, which allowed BellSouth to reassign working AT&T numbers to
16	new BellSouth service. AT&T's customers, of course, were outraged at what
17	they perceived as AT&T's failure to provide adequate service. In Exhibit
18	JMB-R16, I provide a number of e-mails and letters concerning customers
19	who were affected in October 2000, despite the fact that BellSouth
20	implemented edits and procedures in December 1999, to eliminate this very
21	thing.
22	

1	Q.	ARE THERE OTHER PROBLEMS WITH LOCAL NUMBER
2		PORTABILITY PROCESSES AND THE LNP GATEWAY THAT
3		RESULT FROM BELLSOUTH'S DEVELOPMENT PROCESS?
4	Α.	Yes. The local number portability processes and the LNP Gateway itself
5		were developed by BellSouth outside the Change Control Process. In
6		addition to the customer-impacting process problems discussed above, I will
7		describe how the LNP Gateway also denies ALECs and regulators of
8		BellSouth in all nine states the processes and data needed to meet business
9		and regulatory requirements.
10		
11		The LNP Gateway itself was placed into service in August/September 1998,
12		without the first scrap of technical documentation about its operation or
13		location in the flow of processing ALECs' LNP-related orders. Historically,
14		BellSouth has placed systems that must communicate with other systems
15		external to BellSouth on the "downstream" side of its Service Order Control
16		System ("SOCS"). Examples include communication with BAPCO for
17		directory listings, communication with its 911 database vendor, and
18		communication with the Service Management Systems of the network
19		signaling system and other databases such as the Line Information Database
20		("LIDB").
21		
22		Given that the Local Exchange Ordering ("LEO") and Local Exchange
23		Service Order Generator ("LESOG") were already in place and operational

1	for ALEC-originated local service requests, and in the absence of any
2	specifications about the LNP-GTWY, ALECs made the logical assumption
3	that LNP-GTWY had also been designed and placed "downstream" from
4	SOCS.
5	
6	Many months later, however, through continued questioning associated with
7	various anomalies in processing LNP orders, the industry discovered that the
8	LNP-GTWY was "upstream" from SOCS. The LNP-GTWY had in fact been
9	developed and placed in the ALEC service request process flow to replace
10	LEO-LESOG when an ALEC service request contained a request for LNP.
11	Without any notice to ALECs, BellSouth had placed a "router" between the
12	ALEC interfaces (EDI, TAG and LENS) and the two possible paths an ALEC
13	LSR could now take, the LEO-LESOG path or the LNP-GTWY path. It is
14	impossible to measure the wasted ALEC resources and ALEC customer ill
15	will that resulted from BellSouth's decision to develop the LNP process and
16	LNP Gateway without ALEC input.
17	
18	The LNP-GTWY path processes only LSR's that include requests to port a
19	number away from BellSouth to an ALEC. This includes two types of LSRs:
20	those that request migration of a loop and porting of the associated telephone
21	number (Reqtype B) and those that request the porting of a telephone number
22	without its associated loop. (Reqtype C)
23	

23		THINKS THAT TRAINING AND ITS DOCUMENTATION SHOULD
22	Q.	MR. PATE DOESN'T SEEM TO UNDERSTAND WHY AT&T
21		
20		ALECs are being denied any possibility of timely evaluation and input.
19		ALEC industry without the ability for an open dialogue under the CCP,
18		others). However, since development is occurring largely out of sight of the
17		to migrate BellSouth's retail transactions to the new architecture, among
16		migrate all CLEC transactions to the Telcordia vendor solution, future plans
15		deficiencies, unsatisfactory performance, capacity concerns, future plans to
14		existing systems for xDSL and line sharing . Those reasons include design
13		but Mr. Pate does not discuss the reasons BellSouth has elected not to use the
12		have a broader scope of applicability, perhaps to all types of ALEC orders,
11		BellSouth's development of xDSL and line sharing support services could
10		(which sounds largely like its vendor's sales pitch). it seems possible
9		From the explanations and claims made in Mr. Pate's Georgia testimony.
8		
7		processing of ALEC LSRs.
6		process typically results in an architecture that further complicates the
5		being developed specifically for ALEC use. Exclusion of ALECs from the
4		ALECs only limited participation and input, even though these interfaces are
3		testimony as Exhibit JMB-R17. Once again, BellSouth has elected to allow
2		extensive nature of these developments. I have attached his Georgia
1		Pate recently filed testimony in Tennessee and Georgia that addresses the

1		FALL UNDER THE CCP, AND ONCE AGAIN ACCUSES AT&T OF
2		ATTEMPTING TO CIRCUMVENT THE PROCESS. PLEASE
3		COMMENT.
4	Α.	AT&T's desire for a documented training process cannot be considered an
5		attempt to circumvent the process. Additionally, AT&T is not alone in its
6		concerns about BellSouth's failure to document its training process.
7		Exhibit JMB-R18 is a copy of KPMG's Florida Third Party Test Exception 9
8		and BellSouth's response that deals with BellSouth's failure to document its
9		ALEC training process. The procedures outlined in BellSouth's response are
10		clearly newly minted and provide ample support for AT&T's position that
11		ALEC training and its documentation should be included under the CCP.
12		
13	Q.	HAS THERE BEEN AN INCREASE IN CHANGE CONTROL
14		ACTIVITY DURING 2000?
15	A.	Yes. The emphasis placed on Change Control by the FCC in its New York
16		and Texas 271 decisions, and by KPMG in the Georgia and Florida Third
17		Party Tests served as an impetus to BellSouth to take change control off the
18		back burner and turn up the heat – things have been boiling ever since.
19		Activity, however, should not be confused with success or real improvement
20		in meeting the ALECs' business needs. The various Change Control Logs
21		included in Exhibit JMB-R19 provide a source of considerable information.
22		

First, I will contrast change control in 1999 with change control in 2000 at a very high and simplistic level. In 1999, there were 14 officially recognized change requests; in 2000, there have been 257 (as of December 20, 2000).

In 1999, BellSouth submitted no change control requests, and many areas, including defects were outside the scope of the process. Here is the

7 disposition of the 14 ALEC requests submitted in 1999.

1999 ALEC Change Request Disposition at Year End 2000

Submitted	Implemented	Cancelled	Pending	Scheduled
14	5	2	2	5 (Release 10,
				June 30, 2001)

The two pending change requests⁸ were both submitted on September 12, 1999, and despite having been accepted and prioritized still do not have an implementation commitment from BellSouth.

In 2000, BellSouth submitted its first ever change request, and the scope of requests BellSouth would accept expanded, including defect correction requests.

Year 2000 Change Request Disposition

	Submitted	Implemented	Cancelle d	Pending	Scheduled	"New"	Defect
Total	257 (241)	84	69	32	16	23	17
BellSouth	96	41	20	15	7	4	9
ALECs	162 (1 45)	43	49	17	9	19	8

•	Defisional 5 various logs do not reconcide to each other. To submitted change
2	requests appear not to have been captured in any category. In constructing
3	this matrix, I elected to use the current (12/20/00) and archived log, count the
4	total entries in each category, count the entries identified as BellSouth
5	initiated and then subtract to get the ALEC total - this of course assigns all
6	missing CRs as belonging to the ALECs.
7	
8	Using the 241 submissions that can be tracked using the logs we can make a
9	number of observations.
10	• after two years of submitting no change requests, BellSouth is now
11	clearly the largest single user of the process.
12	• BellSouth initiated CRs account for 49% of all implementations.
13	• a significantly higher percentage of BellSouth initiated CRs are in
14	implemented, pending or scheduled status than are ALEC initiated
15	requests:
16	 BellSouth:65% (63 of 96)
17	■ ALECs 43 - 48% (69 of 145 or 69 of 162, depending
18	on which data is used)
19	
20	A further analysis of implemented BellSouth CRs reveals that 29 of the 41 or
21	71% were "defects" and that does not include cases such as described above
22	when BellSouth has implemented Type 4 changes as if they were defects thus

⁸ Parsed CSRs and an electronic process for correcting dropped 411 listings.

disguising their true nature. In contrast, only 17 (40%) of the implemented ALEC CRs originated as defects. Many of BellSouth's CRs appear to be related to KPMG finding in the two ongoing Third Party Tests. BellSouth's use of the process in this manner may not be in the best interests of the ALECs.

A.

Q. PLEASE SUMMARIZE YOUR RESPONSE TO MR. PATE'S

TESTIMONY REGARDING THE CHANGE CONTROL PROCESS.

While Mr. Pate attempts to portray AT&T as a renegade trying to circumvent an otherwise cooperative and collaborative process, the truth is that BellSouth simply has been unable to obtain ALEC agreement for the process it proposes. As the multiple examples in my testimony illustrate, several ALECs have been asking for changes, but BellSouth continues to exercise exclusive control over the process, thus preventing true collaboration from taking place.

Mr. Pate's testimony also glosses over the deficiencies in the process by providing high-level overviews and citing obscure examples that are not indicative of the process. But as my direct and rebuttal testimony clearly illustrate, the current process is fraught with deficiencies that allow critical problems to languish, ALEC requests to be denied unilaterally, and even agreed-upon changes to move unnecessarily at a snail's pace such that

1		months, and even more than a year, can pass before change requests are
2		implemented.
3		
4	Q.	WHAT DOES AT&T REQUEST THAT THE COMMISSION DO
5		REGARDING THIS ISSUE?
6	A.	AT&T requests that the Commission correct these deficiencies by adopting
7		the revised version of the CCP attached as Exhibit JMB-10 to my direct
8		testimony in the context of whatever is the then-most-current version of the
9		Change Control document (Version 2.0 at this writing).
10		
11		Issue 31: What should be the resolution of the following OSS issues
12		currently pending in the change control process but not yet provided? (The
13		Equivalent OSS Issue)
14		
15		a) parsed customer service records for pre-ordering?
16		b) ability to submit orders electronically for all services and elements?
17		c) electronic processing after electronic ordering, without subsequent
18		manual processing by BellSouth personnel?
19		
20	Q.	ON PAGES 65 AND 66 OF HIS TESTIMONY MR. PATE
21		DESCRIBES HIS VIEW OF THE STATUS OF AT&T'S CHANGE
22		REQUEST FOR PARSED CSRS. DO YOU HAVE ANY
23		COMMENTS?

1	A.	Yes. Mr. Pate accurately states that AT&T presented its change request for
2		parsed CSRs via the change control process in September, 1999. However,
3		AT&T and other ALECs first made this request to BellSouth in September,
4		1998, a full year earlier, as part of its requirements for the OSS99 upgrade.
5		BellSouth refused to include parsed CSRs in the upgrade, and thus AT&T
6		had to resubmit its request through change control. As Mr. Pate indicates,
7		this was one of eleven pending change requests prioritized by the ALECs,
8		and it received the number one ranking by the group for the TAG interface.
9		Despite ALEC agreement on the high priority of this request, it has been
10		languishing ever since. A review of the September 28. 1999 meeting
11		minutes, provided in Mr. Pate's Exhibit RMP-13, shows that this change
12		request was targeted for implementation in April, 2000. Others were
13		requested in similar time frames, and still others were to be completed as
14		soon as possible ("ASAP"). However, to date, BellSouth has only
15		implemented four of the eleven change requests prioritized in September
16		1999, although it has implemented a total of 76 other change requests of
17		varying types since that meeting.
18		Mr. Pate implies that ALEC reprioritization is the cause of this lengthy delay,
19		rather than BellSouth's actions. Mr. Pate is wrong. BellSouth made the
20		unilateral decision to downgrade this important request, and announced its
21		decision to the ALECs. Thus, the March 29, 2000 change control meeting
22		minutes (Pate Exhibit RMP-14) shows that the status of AT&T's request was
23		downgraded from "Targeted for release 4/20/2000" to "Subteam being

ALECs votes parsed CSRs as their number one priority for TAG interface changes during the September 18, 1999 meeting, and they have never reprioritized this issue. During the September 18, 2000, Release Package Meeting, BellSouth again downgraded and delayed the implementation of this change, and now states that "Parsed CSR could possibly be implemented with Release 10.0 in May 2001." Rebuttal Exhibit JMB-R20. Even more recently, on December 5, 2000, BellSouth published its proposed schedule to the sub-team mentioned above, showing a planned implementation date of December 31, 2001, for parsed CSRs! Exhibit JMB-R21. Therefore, due to BellSouth's unilateral control of this process, a request that has been pending for two years now has a scheduled implementation date over three years from the ALEC's original request.

A.

Q. MR. PATE INDICATES IN HIS TESTIMONY THAT BELLSOUTH HAS MET ITS OBLIGATIONS REGARDING PARSING. DO YOU AGREE?

No. BellSouth provides parsed CSRs to its own retail customer service representatives but does not provide parsed CSRs to AT&T. BellSouth's systems thus are able automatically to populate its own retail orders, saving time and expense, and providing a greater level of accuracy. Because BellSouth provides parsed CSRs to its customer service representatives, it also is required to provide the same functionality to AT&T.

Mr. Pate argues that BellSouth has met its obligation to provide nondiscriminatory access if "data is provided to CLECs in the same manner as it is to BellSouth's Retail units." Pate testimony at page 62 and 63. Mr. Pate thus attempts to introduce an artificial wholesale/retail distinction, and hopes the Commission will overlook the functionalities that BellSouth provides within its retail operations, such as parsed CSRs.

Mr. Pate also argues that AT&T can use its own systems to parse the unparsed CSR data provided by BellSouth. This argument is not only irrelevant (because it ignores BellSouth's obligation to provide parsed data on a non-discriminatory basis), but often incorrect. Only if BellSouth provides AT&T with data that contains delimiters, and also provides the rules by which the fields represented by the delimiters can be determined, can AT&T separate BellSouth's unparsed data and place it in the appropriate fields. For example, Mr. Pate discusses the "customer's listed name" field on page 62 of his testimony. BellSouth provides this information to AT&T in one field, without delimiters, so AT&T's systems cannot parse this data. Yet BellSouth requires AT&T to submit an ordering form in which the customer name must be shown in a minimum of two fields, forcing AT&T to separate this information manually. Rebuttal Exhibit JMB-R22.

⁹ Mr. Pate appears to indicate in his testimony that AT&T's request is inappropriate and unnecessary because BellSouth "<u>retains</u> the customer's listed name as a complete field", e.g. "Pate, Ronald M.". Pate testimony at 62. BellSouth's decision to "retain" information as one field is irrelevant. It provides its customer service representatives with parsed CSRs, so BellSouth's systems may automatically populate retail orders. BellSouth thus is obligated to provide AT&T with this same functionality.

١		
2		Thus AT&T is unable to reliably automatically populate its service orders
3		with the CSR information BellSouth currently provides to CLECs, but
4		BellSouth is able to automatically populate its own service orders.
5		
6		(b) ability to submit orders electronically for all services and elements?
7		
8	Q.	MR. PATE STATES IN HIS TESTIMONY THAT NON-
9		DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL
10		LSRS BE SUBMITTED ELECTRONICALLY. HE FURTHER
11		STATES THAT BELLSOUTH'S OWN RETAIL PROCESSES OFTEN
12		INVOLVE MANUAL PROCESSES, AND THEREFORE THERE IS
13		NO REQUIREMENT THAT EVERY LSR HAS TO BE SUBMITTED
14		ELECTRONICALLY. PLEASE COMMENT.
15	A.	Mr. Pate uses an apples-to-oranges comparison in an attempt to convince the
16		Commission that BellSouth is treating AT&T the same as it treats itself.
17		However, a careful reading of his testimony reveals the lack of candor in
18		BellSouth's position. When Mr. Pate addresses AT&T's requirements, he
19		correctly notes that AT&T wants to be able to submit all orders
20		electronically. However, when he discusses BellSouth's own ordering
21		capability, he broadens his terminology from actual order submission and
22		instead uses the terms "manual processing" and "manual handling" of
23		BellSouth orders, which are not the same thing as order submission.

Additionally, although he admits that the manual processing and handling of which he speaks occur as part of the order preparation process, not as part of the order submission process, he goes on to imply that because the manual pre-ordering processes are substantially the same for both retail and ALEC orders, that BellSouth is providing an equivalent ordering process. Mr. Pate's admission is simply irrelevant to the ordering process. AT&T does not dispute that both its requests for service and BellSouth's requests for service involve some level of manual collection of information and order preparation before input into each company's respective ordering systems. But after an order is prepared, BellSouth has the ability – which AT&T does not -- to input that order into its ordering system. What AT&T is asking for itself is to be able to submit its orders electronically, once prepared, just as BellSouth does for its customers. BellSouth continues to refuse to provide that non-discriminatory capability. WHY IS ELECTRONIC ORDER SUBMISSION IMPORTANT TO Q. AT&T? As I stated in my direct testimony, lack of electronic ordering increases the A. possibility of errors, extends intervals, and increases costs. Electronic ordering allows an ALEC to populate its own databases simultaneously with providing an order to BellSouth. A manual process, however, requires two

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I		steps; an order must be provided to BellSouth, and the appropriate ordering
2		information be separately input into AT&T's internal OSS.
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4	Q.	MR. PATE USES EXHIBITS RMP-17 AND RMP-18 TO ATTEMPT
5		ILLUSTRATE THAT "BELLSOUTH PROVIDES ALECS THE
6		ABILITY TO ORDER COMPLEX SERVICES IN SUBSTANTIALLY
7		THE SAME TIME AND MANNER AS IT PROVIDES TO ITS
8		RETAIL CUSTOMERS." PLEASE COMMENT.
9	A.	Mr. Pate's exhibits do not achieve that goal. As the unshaded (electronic)
10		blocks in each exhibit demonstrate, the ALEC simply does not place its
11		orders as BellSouth does. Rather, as the two exhibits clearly indicate,
12		BellSouth submits both its own electronic order and the ALEC's order,
13		thereby denying ALECs the advantages of electronic order submission as
14		described above. For Mr. Pate's diagrams actually to depict a
15		nondiscriminatory process, the block on Exhibit 17, presently labeled "CSA -
16		ORDER ENTRY INTO DOE" would have to show and accurately represent
17		input of the order by the ALEC employee into the ALEC sales and marketing
18		interface.
19		
20		Mr. Pate's exhibits reveal an additional area of discrimination. The
21		BellSouth retail order is processed using BellSouth's new Regional Ordering
22		System (ROS), while the ALEC order is processed using the former system,
23		Direct Order Entry (DOF) In his description of ROS Mr. Pate indicates

1		ROS "utilizes software to compare each FID contained within the service
2		order to corresponding SOER edits." It is highly unlikely that BellSouth
3		would have gone to the expense of deploying a new ordering system such as
4		ROS if it were not superior to the old one. Yet BellSouth is not using that
5		superior capability for ALEC orders. Thus, in actuality, Mr. Pate's exhibits
6		depict that an ALEC orders complex services in a very different (and
7		discriminatory) "manner" when compared to BellSouth.
8		
9		(c): Electronic processing after electronic ordering, without subsequent
10		manual processing by BellSouth personnel.
11		
12	Q.	MR. PATE STATES IN HIS TESTIMONY ON PAGE 74 LINES 20 - 22
12 13	Q.	MR. PATE STATES IN HIS TESTIMONY ON PAGE 74 LINES 20 - 22 THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE
	Q.	
13	Q.	THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE
13 14	Q.	THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY FLOW
13 14 15	Q.	THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY FLOW THROUGH BELLSOUTH'S SYSTEMS WITHOUT MANUAL
13 14 15 16		THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY FLOW THROUGH BELLSOUTH'S SYSTEMS WITHOUT MANUAL INTERVENTION. DO YOU AGREE?
13 14 15 16 17		THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY FLOW THROUGH BELLSOUTH'S SYSTEMS WITHOUT MANUAL INTERVENTION. DO YOU AGREE? Absolutely not. The Act and the FCC require that BellSouth provide non-
13 14 15 16 17 18		THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY FLOW THROUGH BELLSOUTH'S SYSTEMS WITHOUT MANUAL INTERVENTION. DO YOU AGREE? Absolutely not. The Act and the FCC require that BellSouth provide non- discriminatory access to its OSS. Because all of BellSouth's orders are
13 14 15 16 17 18 19		THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY FLOW THROUGH BELLSOUTH'S SYSTEMS WITHOUT MANUAL INTERVENTION. DO YOU AGREE? Absolutely not. The Act and the FCC require that BellSouth provide non-discriminatory access to its OSS. Because all of BellSouth's orders are capable of flow through, the ALECs' orders must be provided with the same

In 1997, this Commission made its own independent investigation into the OSS BellSouth was offering to the ALEC community and found them lacking. In its order this Commission established the criteria BellSouth would have to meet in order to demonstrate that its offered OSS were providing nondiscriminatory access, and determined that BellSouth must provide electronic interfaces that require no more human or manual intervention for ALECs than for BellSouth: Upon consideration, we believe that BellSouth is required to demonstrate to this Commission and to the FCC, that its interfaces provide nondiscriminatory access to OSS functions. Although AT&T witness Bradbury stated that there are five characteristics of a non-discriminatory interface, we find it appropriate to recognize four of those characteristics. We find that each interface must exhibit the following characteristics to be in compliance with the nondiscriminatory standards of the Act. They are: 1) the interface must be electronic. The interface must require no more human or manual intervention than is necessarily involved for BellSouth to perform a similar transaction itself; 2) the interface must provide the capabilities necessary to perform functions with the same level of quality, efficiency,

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1		and effectiveness as BellSouth provides to itself; 3) the
2		interface must have adequate documentation to allow
3		an ALEC to develop and deploy systems and
4		processes, and to provide adequate training to its
5		employees; and, 4) the interface must be able to meet
6		the ordering demand of all ALECs, with response
7		times equal to that which BellSouth provides itself.
8		(DOCKET NO. 960786-TL; ORDER NO. PSC-97-
9		1459-FOF-TL: ISSUED: November 19, 1997, pages
10		101 and 177-178, emphasis added.)
11		
12		Mr. Pate, however, attempts to confuse this issue by introducing BellSouth's
13		own definition of ALEC flow-through.
14		
15	Q.	HOW DOES BELLSOUTH DEFINE ALEC FLOW-THROUGH?
16	A.	On page 75 of his testimony, Mr. Pate indicates that ALEC flow-through
17		occurs when a "complete and correct electronically submitted LSR is sent
18		via one of the ALEC ordering interfaces (EDI, TAG, or LENS), flows
19		through the mechanical edit checking and LESOG system, is mechanically
20		transformed into a service order by LESOG, and is accepted by the Service
21		Order Control System (SOCS)." The portions shown in bold are
22		BellSouth's modifications to the FCC's definition of flow-through, which is
23		discussed below.

ı	Ų.	DOES MR. PATE DEFINE OR DESCRIBE BELLSOUTH'S RETAIL
2		FLOW-THROUGH?
3	A.	No. However, the flow-through process for BellSouth shares many
4		commonalties with the ALEC flow-through process. The following is a
5		description of BellSouth flow-through, using the common areas depicted in
6		bold from the ALEC flow-through description above. Information specific to
7		BellSouth's retail flow-through is shown in italics:
8		Retail flow-through occurs when a complete and correct
9		electronically submitted LSR is sent via one of the retail ordering
10		systems (RNS, ROS, or DOE), flows through the mechanical edit
11		checking, and is accepted by the Service Order Control System
12		(SOCS).
13		
14		As will be described below, <u>all</u> BellSouth orders are capable of flow through
15		between its ordering systems and SOCS, while only some ALEC orders are
16		allowed to do so.
17		
18	Q.	IS BELLSOUTH'S DEFINITION OF FLOW-THROUGH
19		CONSISTENT WITH THE FCC'S DEFINITION?
20	A.	No. BellSouth has significantly both embellished and restricted the FCC's
21		definition for its own purposes. The FCC's definition is found in paragraph
22		107 of the LAIL Order:

1	A competing carrier's orders "flow through" if they are
2	transmitted electronically through the gateway and
3	accepted into BellSouth's back office ordering systems
4	without manual intervention.
5	While BellSouth maintains that all it has done with its revision of the FCC's
6	simple definition is to make it specific to BellSouth's systems, it has in fact
7	introduced significant requirements beyond the FCC's.
8	
9	The central concept of FCC's definition (which it should be noted addressed
10	only flow-through for ALEC service requests) can be restated to encompass
11	both ALEC and BellSouth retail processes without introducing any spurious
12	restrictions:
13	A service request that is input to a sales and marketing
14	interface by the manual actions of a CLEC or
15	BellSouth employee and subsequently sent to and
16	accepted by BellSouth's Service Order Control System
17	("SOCS") without any further human intervention has
18	flowed-through.
19	
20	Using this description, it is easy to see that all BellSouth retail service
21	requests input to BellSouth's RNS or ROS sales and marketing interfaces are
22	capable of flow-thorough to SOCS, while only a portion of ALEC service
23	requests sent electronically to BellSouth are allowed to do so. In exactly the

1		same way, all BellSouth retail service requests input to the systems that
2		preceded ROS, DOE and SONGS, were capable of flow-through.
3		
4		
5	Q.	MUST EVERY STEP OF THE PREORDERING AND ORDERING
6		PROCESS BE AUTOMATED BEFORE AN ORDER CAN FLOW
7		THROUGH?
8	A.	No. As noted above, flow-through occurs when an order is entered into a
9		sales and marketing order system and it flows through to SOCs. As shown in
10		Mr. Pate's Exhibit RPM-17, there also may be a number of manual pre-
11		ordering steps necessary to gather information for the order.
12		
13	Q.	MR. PATE CLAIMS ON PAGE 75 OF HIS TESTIMONY THAT TO
14		HIS KNOWLEDGE NO FLOW-THROUGH CHANGE REQUESTS
15		HAVE BEEN SUBMITTED TO THE CCP. IS THIS CORRECT?
16	A.	No. It is both incorrect and irrelevant. AT&T has submitted CRs 0137 and
17		0160 and other ALECs have also submitted flow-through related change
18		requests. However, this is irrelevant to BellSouth's obligation to provide
19		nondiscriminatory OSS functionality, including flow-through ordering. This
20		requirement was established by the Act and the implementing rules and
21		orders of the FCC and by the orders of various state commissions, including
22		this Commission's 1997 order. Further, as Mr. Pate knows AT&T and
23		BellSouth have been engaged in on-going discussions of flow-through and

1		order mechanization since early 1997. The most recent dialogue began
2		August-September 1999 and continues to the present. Exhibit JMB-R23
3		provides copies of inter-company correspondence and meeting minutes from
4		this on-going effort.
5		
6	Q.	MR. PATE STATES ON LINES 9-10, PAGE 76 OF HIS TESTIMONY
7		THAT BELLSOUTH HAS CONCLUDED THAT MECHANIZING
8		MANY LOWER-VOLUME COMPLEX RETAIL SERVICES WOULD
9		BE IMPRUDENT FOR ITS OWN RETAIL OPERATIONS. IS THIS
10		RELEVANT TO FLOW-THROUGH?
11	A.	No. Complex services are rarely totally mechanized, but this is irrelevant to
12		the issue of flow-through. An order for a complex service may require many
13		manual pre-ordering activities yet still flow through, as shown in Mr. Pate's
14		Exhibit RPM-18.
15		
16		As is indicated above, retail flow-through is achieved when a service request
17		is successfully transmitted from the ordering system (RNS, ROS, DOE), and
18		is accepted by SOCS. A review of Mr. Pate's exhibit reveals that a BellSouth
19		employee enters an order into ROS, which transmits it to SOCS - thus
20		flowing through. In his testimony on page 76, Mr. Pate refers to the manual
21		pre-ordering processes that also are used to prepare these complex orders for
22		entry into BellSouth's front-end system. 10 His exhibit uses shaded areas to

¹⁰ In a similar discussion beginning on page 71, at lines 16, Mr. Pate discusses "handling" of complex orders. In his discussion of manual handling, he refers to activities that occur

indicate steps involving manual processing. The Commission should
concentrate its attention, however, on the two BellSouth activities (order
entry into ROS and receipt by SOCS) that are not found in the shaded areas
indicative of manual processing. BellSouth's own exhibit shows that these
steps are electronic, and that BellSouth's own retail complex orders do flow
through from its ordering systems to SOCs. ALEC orders are thus entitled to
the same flow through process.

There is <u>no</u> retail service that BellSouth cannot order electronically. If, as Mr. Pate testifies, BellSouth had elected not to mechanize a particular retail service, then it would be impossible to order that service via the retail RNS, DOE or ROS interfaces. Yet BellSouth has never identified a single retail service that its retail service representative cannot order via input to one of these systems, although AT&T has repeatedly inquired into this issue.

In the spring of 1999, for example, BellSouth was asked to respond to a matrix identifying the interface it used to place requests for each of its retail services. In its response, BellSouth did not identify a single service that was not was not ordered via RNS, DOE, or SONGS. Rebuttal Exhibit JMB-R24 provides a copy of BellSouth's response. More recently, during the North Carolina arbitration between AT&T and BellSouth, Mr. Pate was asked whether there was any service that a BellSouth representative could not order

<u>before</u> the order is input. These activities are irrelevant to flow-through. Flow-through (or non-flow-through) necessarily occurs <u>after</u> the order is input.

1		via ROS, to which he responded that he was not aware of any such service.
2		(Rebuttal Exhibit JMB-R25 - NC Testimony Transcript reference page 227-
3		228). Mr. Pate confirmed his North Carolina response in the Georgia
4		arbitration hearing Exhibit JMB-R26, Georgia Transcript at page 1107.
5		
6	Q.	HAVE OTHER KNOWLEDGEABLE BELLSOUTH EMPLOYEES
7		PROVIDED TESTIMONY INDICATING THE EXISTANCE OF
8		FLOW THROUGH FOR ORDERS PLACED USING THE DOE
9		INTERFACE?
10	A.	Yes. In a deposition taken on July 28, 2000, Mr. Douglas W. McDougal,
11		discussing the importance of flow-through to the operation of the LCSC,
12		referred directly to the importance of flow-through of the orders his
13		employees placed using the DOE, SONGS, and LNP interfaces. This
14		discussion may be found on pages 16-20 of his deposition which I have
15		attached as Rebuttal Exhibit JMB-R27. On page 17, line 16, Mr. McDougal
16		states:
17		"However, we also have flowthrough on orders that
18		come in by fax and paper because we get tremendous
19		of fax and paper orders, particularly from smaller
20		CLECs. So we attribute flowthrough to once the
21		service rep builds the order and releases the order to
22		the downstream systems, it flows without erroring
23		out."

1		It is entirely logical to believe that if orders submitted by LCSC employees
2		using DOE are capable of flow-through, orders submitted by BellSouth retail
3		employees using DOE or its replacement, ROS, are also flow-thorough
4		capable.
5		
6	Q.	DOES BELLSOUTH DESCRIBE REASONS OTHER THAN
7		COMPLEXITY THAT ALEC ORDERS FALL OUT FOR MANUAL
8		PROCESSING?
9	A.	Yes. BellSouth has created "designed fallout", which means that ALEC
10		order fall out for manual handling for reasons other than complexity. Mr.
11		Pate indicates that these other reasons are described in its Service Quality
12		Reports Performance Reports document. A review of page 19 of that
13		document (Rebuttal Exhibit JMB-R28) reveals at least twelve scenarios in
14		which BellSouth has decided that orders should not flow through. The
15		discriminatory nature of this decision is apparent in the last line of this
16		information, which states "all but one [of the twelve non flow-through
17		scenarios] are unique to the CLEC environment."
18		
19	Q.	DO YOU AGREE WITH THE STATEMENT THAT THESE
20		SCENARIOS ARE UNIQUE TO THE CLEC ENVIRONMENT?
21	A.	No. Although the non-flow through or manual fall-out is unique to the
22		ALEC environment, the scenarios are not. For example, the exhibit lists
23		several types of ALEC orders that do not flow through: ALEC orders with

ı		more than 25 business lines, expedited orders, end-user outside moves,
2		pending order activity on account, and transfer of calls option. But these
3		situations are not unique to ALECs. Certainly BellSouth has these types of
4		scenarios as well, but BellSouth's resulting retail orders do not fall out for
5		manual processing as do ALEC orders. In a deposition taken on July 20,
6		2000, Mr. Pate was uncertain about the "uniqueness" of these situations to
7		the ALEC environment. On page 42 beginning at line 25 Mr. Pate states:
8		
9		"Well, I need to talk to the author on that as well.
10		They were trying to categorize these as unique; and,
11		frankly, they're not all unique, but most are unique. I
12		think that's an area where we can go back and look, but
13		the majority of these are unique to CLEC
14		environment."
15		
16		In subsequent discussion Mr. Pate agreed that many of the same situations
17		existed for BellSouth. I have attached Mr. Pate's deposition as Rebuttal
18		Exhibit JMB-R29.
19		
20	Q.	ON PAGES 76 AND 77 OF HIS TESTIMONY MR. PATE DISCUSSES
21		WHAT HE CALLS THE TWO MAIN REASONS THAT
22		ELECTRONICALLY SUBMITTED ORDERS FALL OUT FOR
23		MANUAL HANDLING. FIRST, THAT LESOG HAS NOT BEEN

1		PROGRAMMED TO HANDLE REQUESTS FOR CERTAIN TYPES
2		OF PRODUCTS AND SERVICES AND SECOND, UNIQUE
3		CIRCUMSTANCES RELATED TO THE LSR. PLEASE COMMENT.
4	A.	It is important to understand that the programming of LESOG is totally at
5		BellSouth's discretion and is not limited by any industry standards or other
6		external guidelines - it is simply BellSouth's, and BellSouth's alone, decision
7		as to what programming to install in LESOG. ¹¹ Ms. Terri Hudson speaking
8		at the November 1, 2000, meeting made this point clear when she stated that
9		there were many things BellSouth could do to improve "flow-through" for
10		ALECs without the ALECs needing to perform any coding or take any other
11		action. Ms. Hudson's words were paraphrased in the minutes of the meeting
12		as part of an action item appearing on page 8 (Exhibit JMB-R11):
13		BellSouth will provide a report of internal changes that have a
14		positive impact and improve performance for CLECs, but do not
15		require coding. These changes improve "flow-through" in BellSouth
16		and would require no vote by the CLECs.
17		
18		Mr. Pate claims once again that "complexity" and "low ordering volume"
19		don't justify programming in LEO that would provide ALECs with parity to
20		BellSouth retail operation. In October 2000, there were 31,883 LEO LSRs
21		subjected to designed manual fallout (10% of the total submitted), and 27,406
22		LEO LSRs that BellSouth's LEO system failed to process as it should have

1	(8% of the total submitted). For the LNP-GTWY there were 5,911 LSRs
2	subjected to designed manual fallout (28% of the total submitted), and 7,450
3	LSRs that the LNP-GTWY system failed to process as it should have (36% of
4	the total submitted). Thus, in October alone 72,650 (21% or 1 out of 5)
5	electronically submitted LSRs were subjected to manual handling by
6	BellSouth's unilateral programming decisions. Low volume is clearly not an
7	issue that justifies BellSouth's continuing failure to program LESOG/LNP-
8	GTWY or fix its currently defective programming.
9	
10	As discussed above, complexity is not an issue, as BellSouth provides flow-
11	through for its own service requests.
12	
13	As discussed above, the claim of uniqueness is also highly suspect, and the
14	resulting impact on customer service of designed manual fallout is often
15	negative rather than positive. Consider the absurdity of have LSRs that
16	request expedited due dates fallout for manual processing, when the average
17	interval from when the LSR falls out to when it is claimed by a service
18	representative is 29 to 40 hours as documented in my direct testimony at page
19	92. Alarmingly, the interval an LSR waits to be claimed has increased
20	significantly since my direct testimony was filed.

This is true of all the software and system components BellSouth has introduced between the ALEC interface (EDI, TAG, LENS) the BellSouth's legacy Service Order Control System (SOCS). This includes, the LSR Router, LEO, LESOG, LNP Gateway, LAUTO, and the new "Corporate Gateway".

Q. DO YOU HAVE ADDITIONAL DATA CONCERNING THE

2 INTERVAL ALEC LSRS WAIT TO BE CLAIMED AFTER FALLING

3 OUT FOR MANUAL PROCESSING?

4 A. Yes. When LSRs fall out for manual processing, BellSouth routes the LSR to
5 the Local Carrier Service Center ("LCSC"). It possible to determine the
6 duration between the time an LSR falls out for manual processing (as a result
7 of either a Designed Manual Fallout or a BellSouth System Error) and the
8 time an LCSC representative "claims" that LSR to begin working on it. The
9 following table from my direct testimony provides the average "Claim
10 Interval" for AT&T's LSRs in May and June.

Average Claim Interval		
May	June	
40 hours	40 hours	
29 hours	36 hours	
30 hours	30 hours	
	May 40 hours 29 hours	

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I recently calculated these same intervals for the months of September and
 October and have summarized that data in the following table.

OCN	Average Claim Interval	
	September	October
7125	34 hours	59 hours
7421	32 hours	130 hours
7680	67 hours	74 hours

1		The increase in this interval from earlier in the year, particularly during the
2		month of October, is unreasonable.
3		
4	Q.	DID AT&T ATTEMPT TO DETERMINE FROM BELLSOUTH WHY
5		THESE INTERVALS INCREASED SO MUCH IN OCTOBER?
6	A.	Yes. AT&T noticed that many of its orders were not being processed in a
7		timely fashion, and questioned BellSouth. On November 3, 2000, BellSouth
8		responded to an AT&T October 20, 2000 e-mail, stating that there had been
9		"a directory listings problem in our LEO systems," that "order volume had
10		overwhelmed the center," and that 20 service representatives would be added
11		to the staff on November 13 th and 20 more in December. Exhibit JMB-R30.
12		I will continue to calculate this interval and provide current data at hearing.
13		Clearly BellSouth's failure to provide flow-thorough ordering jeopardizes
14		ALECs' ability to compete effectively.
15		
16	Q.	THE LOCAL CARRIER SERVICE CENTER ("LCSC") HANDLES
17		ALL MANUALLY SUBMITTED ORDERS AND ALL
18		ELECTRONICALLY SUBMITTED ORDERS THAT FALL OUT FOR
19		MANUAL PROCESSING. MR. PATE HAS REPORTED THAT THE
20		PERCENTAGE OF ELECTRONICALLY SUBMITTED ORDERS
21		HAS RISEN SIGNIFICANTLY OVER THE PAST YEAR. DOES THIS
22		NECESSARILY MEAN THAT BELLSOUTH IS PROCESSING

1		PROPORTIONALLY MORE ALEC ORDERS WITHOUT HUMAN
2		INTERVENTION?
3	A.	No. Because real flow-through for electronically submitted orders is
4		generally low, human intervention on ALEC orders is still unreasonably high
5		and BellSouth still relies excessively on manual processing of ALEC orders.
6		
7		Let me illustrate this point with some data. In the recent Georgia Arbitration
8		(October 31, 2000), Mr. Pate stated that a year ago, (October 1999) 49% of
9		ALEC orders were submitted electronically and that today (October 2000)
10		that percentage had risen to 82%. (Exhibit JMB-R26, TR page 1108).
11		Additionally, BellSouth has provided volume and staffing data in its
12		responses to AT&T's Interrogatories and Document Requests in both North
13		Carolina and Florida. ¹² Combining this with information from the Monthly
14		Flow-Through Reports, we can summarize some significant data points for
15		each of the two months one year apart and make a number of observations.

¹² In North Carolina BellSouth's responses were to IRs 29 and 32, in Florida they are to IRs 34 and 36.

Comparative Data October 1999 / October 2000

	OCTOBER 1999	Counts	% of Total	% of
			LSRs	Electronic LSRs
1	Electronically submitted LSRs	110,814	52%	
2	Manually submitted LSRs	103,123	48%	
3	Total LSRs	213,937		
4	Manual Fallout LSRs	8,180		
5	Total System Error Fallout LSRs	9,590		
6	Manually handled electronic LSRs (4+5)	17,770	A STATE OF THE STA	16%
7	Total LCSC LSRs (2+4+5)	120,893	57%	
8	LCSC Headcount	639		

	OCTOBER 2000	Counts	% of Total LSRs	% of Electronic LSRs
1	Electronically submitted LSRs	345,834	88%	
2	Manually submitted LSRs	47,961	12%	
3	Total LSRs	393,795		
4	Manual Fallout LSRs	37,794		
5	Total System Error Fallout LSRs	43,446	A CONTRACTOR OF THE STATE OF TH	
6	Manually handled electronic LSRs (4+5)	81,240		23%
7	Total LCSC LSRs (2+4+5)	129,201	33%	Section of the sectio
8	LCSC Headcount	740		

While the percentage of LSRs submitted electronically did rise from 52% to 88%, the percentage of LSRs still subject to manual processing only fell from 57% to 33% and the percentage of electronically submitted LSRs subjected to manual handling actually rose from 16% to 23%. Interestingly, while the number of LSRs handled by the LCSC grew 7% (from 120,893 to 129,201), the head count required to handle those LSRs grew 16% -- even though in 1999, 85% of such orders were fully manual while in 2000, only 37% were fully manual. BellSouth still relies excessively on manual processing of ALEC LSRs and as shown above is unable to provide such manual processing in a timely manner.

1	Q.	IN PRIOR ARBITRATIONS MR. PATE HAS CRITICIZED YOUR
2		FLOW THROUGH ANALYSIS AS INCOMPLETE AND
3		INACCURATE BECAUSE YOU DID NOT HAVE ACCESS TO THE
4		UNDERLYING DATA. WHAT IS YOUR RESPONSE?
5	A.	I disagree. The rationale Mr. Pate has used in the past for recasting my
6		calculations is completely inappropriate.
7		
8	Q.	WHAT RATIONALE DID MR. PATE USE?
9	A.	In essence, Mr. Pate's position has been that access to the underlying data is
10		necessary to conduct flow-though analysis. To support his contention, he
11		selected one category of the flow-through report (business resale) for one
12		month to examine the data for factors influencing the level of orders falling
13		out for manual handling. He concluded that orders were not falling out in
14		this case because BellSouth had designed them to, but because two primary
15		ALEC users of the EDI and TAG interfaces had not upgraded their interfaces
16		to take advantage of an upgrade BellSouth had made which allowed one of
17		the services they order to now flow through.
18		
19	Q.	PLEASE COMMENT ON MR. PATE'S POSITION.
20	A.	Mr. Pate's position is inaccurate. Flow-through does not occur at the
21		interface level (EDI, TAG, LENS). Rather, service requests are submitted at
22		the interface level. Flow through, by Mr. Pate's definition on page 75 of his
23		testimony occurs in BellSouth's OSS:

1	"Flow through for a CLEC LSR occurs when the
2	complete and correct electronically submitted LSR is
3	sent via one of the CLEC ordering interfaces (EDI,
4	TAG, or LENS), flows through the mechanical edit
5	checking and LESOG system, is mechanically
6	transformed into a service order by LESOG, and is
7	accepted by the Service Order Control System
8	(SOCS). (emphasis added)
9	
10	As is clearly indicated by Mr. Pate's own definition, flow-through occurs in
11	BellSouth's OSS (LEO/LESOG or LNP/LAUTO), not at the interface level.
12	Unfortunately, the ALEC has no control over what BellSouth designs to flow
13	through its OSS. If BellSouth has designed ALEC orders to flow through in
14	some circumstances, but not others, the responsibility and the ability to
15	correct that problem lies with BellSouth, not with the ALECs. Therefore,
16	BellSouth is responsible for the orders it has designed to fall out for manual
17	handling, and the analysis submitted in my direct testimony is correct.
18	
19	The specific business service mentioned by Mr. Pate in his previous
20	testimony that BellSouth has elected to allow to flow through for EDI
21	releases greater than 6.0 and TAG releases greater than 3.0 is series hunting.
22	Series hunting has been electronically orderable for three years. At any time
23	during those three years BellSouth could have provided flow through for

1		every ALEC submitting such orders. Thus for three years BellSouth denied
2		this capability for up to 147 ALECs when it could have provided it to all with
3		only a change in its programming of LEO/LESOG. Instead, BellSouth has
4		elected to provide this capability only to those ALECs that elect to perform
5		an expensive upgrade. The orders the two ALECs Mr. Pate discusses are still
6		accurate, complete and capable of being provided with flow through as
7		they have been for three years.
8		
9	Q.	HAS MR. PATE'S PRIOR ANALYSIS REFUTED YOUR POSITION
10		THAT BELLSOUTH PROVIDED UNACCEPTABLE LEVELS OF
11		FLOW-THROUGH BUSINESS RESALE?
12	A.	No. Even if all of Mr. Pate's assumptions had been correct, which they were
13		not, his exercise only increased the maximum possible flow-through for TAG
14		from 37% to a still-unacceptable rate of 56%, and EDI from 28% to a
15		similarly unacceptable flow-through rate of 56%. These inflated numbers,
16		which indicate that orders fall out almost half the time, still stand in stark
17		contrast to the 100% flow through for BellSouth's own orders.
18		
19	Q.	IN THE PAST MR. PATE HAS ASSERTED THAT OVERALL FLOW
20		THROUGH RATES ARE SKEWED BECAUSE A SMALL NUMBER
21		OF ALECS ARE DOMINANT VOLUME USERS OF THE
22		ELECTRONIC INTERFACES. IS HIS ARGUMENT ACCURATE OR
23		RELEVANT?

1	A.	No. It makes no difference if BellSouth is discriminating against one user
2		who provides 100% of the volume, or 100 users who each contribute 1% of
3		the volume. If the overall rate of manual fallout and BellSouth-caused
4		system failures is unacceptable, there is no doubt that BellSouth has treated
5		the ALEC industry in a discriminatory manner.
6		
7		The data Mr. Pate uses to identify the "dominant volume users" are public. I
8		should point out, however, that in the past Mr. Pate has been less than
9		thorough in his explanation of this data and the application of available
10		knowledge about individual ALECs.
11		
12		For example, totaling the number of individual horizontal lines, as Mr. Pate
13		has suggested, will overstate the number of users of a given interface for a
14		given product. For example, AT&T, as a user of EDI, may appear in the
15		Business Report two times, in the UNE Report three times, in the LNP
16		Report two times, and in the Residence Report two times in any given month.
17		I am certain the same is true for other ALECs.
18		
19		Thus, in addition to being irrelevant, Mr. Pate's conclusions, which are based
20		on incomplete data, are wrong and misleading.
21		
22	Q.	IN YOUR DIRECT TESTIMONY YOU PROVIDED DATA IN
23		EXHIBITS JMB-20, 21 AND 22. HAS THAT DATA CHANGED?

1 A. No, the data in those exhibits is still valid, however in the interest of 2 providing this Commission with the most current data available I have 3 updated each of them with data through the month of October. The updated 4 exhibits are attached to this testimony as Exhibits JMB-R31, 32, and 33. I 5 will also provide updates to these exhibits at the hearing. 6 7 Q. PLEASE SUMMARIZE YOUR RESPONSE TO MR. PATE'S 8 TESTIMONY REGARDING THE EQUIVALENT FUNCTIONALITY 9 ISSUE (ISSUE 31). 10 A. Mr. Pate offers contradictory views on this issue. He first states that these 11 long-outstanding issues should go through change control, then says that non-12 discriminatory access does not require that BellSouth provide them, and then 13 finally tries to persuade this Commission with easily refuted evidence that 14 BellSouth is already providing similar treatment to ALECs as it provides 15 itself. However, as is illustrated in my responses above, this is not accurate, 16 and BellSouth is continuing its long-standing discrimination against ALECs 17 in the areas of CSR parsing, electronic order submission, and order flow-18 through.

19

20

Q. WHAT DOES AT&T REQUEST THAT THE COMMISSION ORDER

21 **REGARDING THIS ISSUE?**

22 A. AT&T is asking that the Commission order BellSouth to provide equivalent 23 functional capability by providing parsed CSRS, the ability for all orders to

1		be submitted electronically, and flow-through equal to that which BellSouth
2		provides itself. BellSouth should be ordered to provide these capabilities
3		within 12 months of the Commission's order.
4		
5		Issue 32: Should BellSouth provide AT&T with the ability to access, via
6		EBI/ECTA, the full functionality available to BellSouth from TAFI and
7		WFA?
8		
9	Q.	AT&T HAS REQUESTED THAT BELLSOUTH PROVIDE FULL
10		TAFI AND WFA FUNCTIONALITY VIA EBI/ECTA. HAS
11		BELLSOUTH AGREED TO DO SO?
12	A.	No. BellSouth argues that it already provides ALECS with non-
13		discriminatory access to maintenance and repair OSS functions through TAFI
14		and the ECTA Gateway, so it should not be required to meet AT&T's
15		request.
16		
17	Q.	DO YOU AGREE WITH BELLSOUTH'S ASSERTION?
18	A.	No, and neither has the FCC. As I describe in my direct testimony, the FCC
19		concluded that <u>none</u> of BellSouth's repair and maintenance interfaces provide
20		competitors with OSS functionalities equivalent to BellSouth's own
21		capabilities. FCC Second Louisiana Order para 148.
22		

1		Mr. Pate makes an unsubstantiated claim on page 81 of his testimony that
2		BellSouth "provides ALECs with electronic access to its maintenance and
3		repair OSS in a manner that far exceeds what is provided by the Web-based
4		graphical user interface ("GUI") that Bell Atlantic had in place when is was
5		approved by the FCC." This is irrelevant, given the FCC's specific finding
6		regarding the insufficiency of the maintenance and repair OSS BellSouth
7		makes available to ALECs.
8		
9	Q.	PLEASE DISCUSS THE INSUFFICIENCIES OF THE ACCESS
10		PROVIDED BY BELLSOUTH TO ITS MAINTENANCE REPAIR
11		OSS.
12	A.	BellSouth provides two options for electronic trouble reporting: Trouble
13		Analysis Facilitation Interface ("TAFI") and the Electronic Communication
14		Trouble Administration ("ECTA"). As I describe in detail in my direct
15		testimony, TAFI provides the broader array of functionality, but is a human-
16		to-machine interface. ECTA, on the other hand, can be integrated into ALEC
17		systems, but provides only a limited set of functionalities for any type of
18		service. ALECs are denied the ability to access the functionality of TAFI and
19		integrate it into other systems, as BellSouth can. Therefore, BellSouth is not
20		providing non-discriminatory access.
21		
22	Q.	YOU'VE STATED THAT BELLSOUTH HAS INTEGRATED TAFI

INTO ITS OTHER SYSTEMS, BUT MR. PATE IMPLIES THAT TAFI

1		IS NOT INTEGRATABLE. HOW CAN THIS COMMISSION
2		DETERMINE WHO IS CORRECT?
3	A.	Mr. Pate appears to indicate that the TAFI interface can be integrated by
4		neither BellSouth nor ALECs, thus leading a casual reader to conclude that
5		BellSouth and ALECs share equivalent and nondiscriminatory access to
6		TAFI. A careful reading of Mr. Pate's testimony, however, reveals that this
7		simply is not the case. BellSouth can indeed integrate the TAFI interface
8		with its systems, with the exception of its "sales and marketing systems."
9		
10		This Commission also should note that Mr. Pate's testimony herein appears
11		to contradict BellSouth's position in its second Louisiana 271 application
12		before the FCC. There, BellSouth "conceded" that it failed to offer
13		nondiscriminatory access to TAFI functionalities:
14		"We also note that BellSouth concedes that it derives
15		superior integration capabilities from TAFI than the
16		capabilities offered to competitors. BellSouth states
17		that TAFI is a 'human to machine interface' meaning
18		that new entrants using TAFI cannot integrate it with
19		the new entrant's own back office
20		systemsBellSouth, on the other hand, is able to take
21		advantage of its own TAFI system's capability of
22		'automatically interacting with other systems as
23		appropriate' and its customer service representatives

1		need not duplicate their efforts in the same way. $\underline{\ln}$
2		other words, TAFI is integrated with BellSouth's other
3		back office systems."
4		
5		FCC Second Louisiana Order, para. 151, emphasis added.
6		
7	Q.	ON PAGE 85 OF HIS TESTIMONY MR. PATE CLAIMS "IF TAFI
8		FUNCTIONALITY WAS BUILT INTO ECTA, THEN ECTA WOULD
9		NO(T) LONGER BE (A) STANDARDS BASED INTERFACE." IS
10		THIS CORRECT?
11	Α.	No. This is a tired and irrelevant red herring that BellSouth has raised now
12		for over four years. Industry standards are guidelines - providing
13		functionality over and above the guideline does not violate it, in fact doing so
14		is one of the key methods by which the guidelines are expanded and
15		improved. A number of parties using an interface based on industry
16		standards modify the interface to have more functionality or operate more
17		efficiently and then submit their work and the evidence of its value to the
18		industry for consideration as an improvement to the standard. In fact, AT&T
19		and BellSouth have presented such joint modifications of industry standards
20		to the industry in the past.
21		
22		Further it is important to remember, just as I discussed above in Issue 25, that
23		although the use of industry standards can meet the needs of a competitive

local exchange market¹³, lack of industry standards does not excuse an incumbent LEC from meeting its obligation to provide nondiscriminatory access to OSS functions.¹⁴ Similarly, deploying an interface that merely adheres to industry standards is not sufficient to demonstrate nondiscriminatory access. A BOC must provide nondiscriminatory access to its OSS functions irrespective of the existence of, or whether it complies with, industry standards. 15

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PLEASE SUMMARIZE YOUR RESPONSE TO MR. PATE'S Q.

TESTIMONY ON THIS ISSUE.

11 BellSouth asserted that it provides non-discriminatory access to maintenance Α. 12 and repair functionalities, in spite of the obviously discriminatory lack of 13 integratable access to TAFI for ALECs as it provides for itself. Surprisingly, 14 it asserted that TAFI was not integratable for BellSouth, in apparent direct 15 contradiction to affidavits filed by BellSouth at the FCC and upon which the 16 FCC based its findings in determining that BellSouth does not provide non-17 discriminatory access to maintenance and repair.

18

19 AT&T is in agreement with the conclusions and decisions of the orders of the 20 FCC and the Georgia Commission. The FCC determined that BellSouth

21 provides discriminatory access, and the Georgia Commission required

FCC Ameritech Order ¶ 217; FCC BA-NY Order ¶ 88
 FCC South Carolina Order ¶ 121, n. 362.

¹⁵ FCC Louisiana II Order ¶ 137.

1		BellSouth to provide TAFI functionality over a machine-to-machine
2		interface, in accordance with BellSouth's report to the Commission.
3		
4	Q.	WHAT DOES AT&T REQUEST THAT THE COMMISSION ORDER
5		REGARDING THIS ISSUE?
6	A.	AT&T asks the Commission to order BellSouth to provide full TAFI
7		functionality via the ECTA interface on an expedited schedule
8		
9	Q.	DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?
10	Α.	Yes.

1		BELLSOUTH TELECOMMUNICATIONS, INC.
2		DIRECT TESTIMONY OF RONALD M. PATE
3		BEFORE THE NORTH CAROLINA PUBLIC UTILITIES COMMISSION
4		DOCKET NO. P-140, SUB 73 & P-646, SUB 7
5		MAY 26, 2000
6		
7	Q.	PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8		TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.
9		
10	A.	My name is Ronald M. Pate. I am employed by BellSouth
11		Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
12		Services. In this position, I handle certain issues related to local
13		interconnection matters, primarily operations support systems ("OSS").
14		My business address is 675 West Peachtree Street, Atlanta, Georgia
15		30375.
16		
17	Q.	PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.
18		
19	A.	I graduated from Georgia Institute of Technology in Atlanta, Georgia, in
20		1973, with a Bachelor of Science Degree. In 1984, I received a Masters of
21		Business Administration from Georgia State University. My professional
22		career spans over twenty-five years of general management experience in
23		operations, logistics management, human resources, sales and marketing.

PROMULGATED BY THE FCC FOR CHANGE MANAGEMENT. WHAT IS YOUR RESPONSE?

3

A. I have listed these "guidelines" in a table format that follows and stated

whether BellSouth's change control process meets those guidelines. I

have also provided comments on each of Mr. Bradbury's and BellSouth's

compliance with them as appropriate.

8

1

2

Bradbury Guideline	BellSouth's Change Management	Comments
CLP participation	Yes	
Procedures documentation	Yes	
Prioritization and stratification of changes	Yes	
Schedules for notifications	Yes	
A testing environment and minimum 30 day test window new releases	Yes/No	BellSouth offers a test environment for Beta and New Carrier Testing; BellSouth does not currently offer a minimum 30 day test window for new releases. This issue will be discussed below.
A go/no go decision	Yes	
Versioning of releases (maintaining the old version of an interface along with the new)	Yes	
Memorialization of the process, including a means by which the process can be modified	Yes	
Dispute resolution process for CLPs, specific to change management disputes	Yes	
Followed consistently over time	Yes	
Subject to regulatory oversight (which includes enforcement)	Yes/No	BellSouth is negotiating with CLPs, including AT&T, to include compliance with the CCP in interconnection agreements. This will make it binding on the CLP and BellSouth. The dispute resolution process included in the CCP includes referral to state regulatory commissions

9

Docket No. 000731-TP JMB-R1 Page 2 of 2

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> ----Original Message----
> From: Williamson, Jill R, NCAM
           Tuesday, November 28, 2000 2:10 PM
> To: 'Cheryl Richardson'; 'Ranae Stewart'
> Cc: 'Sandra C. Jones'
> Subject: GA1000 OS/DA Test using Line Class Codes (LCCs)
> Importance:
                  High
> Cheryl and Ranae,
> We have reviewed the OS/DA requirements provided by BellSouth to
"Generate specified LCC if RESH/AECN present and OCN equals AT&T".
trying to understand the application of BellSouth's requirements
against our test cases, we've found that the routing of OS/DA calls to
an unbranded platform cannot be accomplished on any of the 800 existing
accounts.
> BellSouth made unbranded OS/DA available in a group of NPA/NXXs
restricted to the ATLNGAPP34A wire center (DMS100 switch). All of the
accounts established for our GA1000 Trial were provisioned out of the
ATLNGAPPDS2 wire center (5ESS switch). At this point, we are only able
to test the routing of unbranded OS/DA on orders for new
service/additional lines.
> I'd like to understand why BellSouth provisioned the switch in which
none of the GA1000 lines were established and whether or not BellSouth
can add the 5ESS switch to the requirements for the GA1000 Trial.
Please provide me with a response no later than Friday, December 1,
2000.
> Sincerely,
> Jill Williamson
```

----Original Message----

From: jrwilliamson@att.com [mailto:jrwilliamson@att.com]
Sent: Wednesday, November 29, 2000 1:11 PM
To: edwardgibbs@att.com; crafton@att.com; sharonnorris@att.com; bradbury@att.com; eppsteiner@att.com; jmperry@att.com; mkamal@att.com; bettybarrett@att.com; gpterry@att.com; mrule@att.com; follensbee@att.com; sockleberry@att.com; vctate@att.com

Subject: RE: GA1000 OS/DA Test using Line Class Codes (LCCs)

Edward,

I just received some new information about what happened with the setup of OS/DA for the GA1000 Trial. BellSouth loaded our LCCs in the correct switch (5ESS), but built the logic for the lookup table using the NPA/NXXs from the incorrect switch (DMS100). They are looking into updating the requirements to include the NPA/NXXs for the 5E, but I don't know when or if they'll make the correction.

Because the LCCs are only loaded in the 5E switch, we will not be able to even test new orders out of the DMS100 switch. I hope to know more later this week.

Jill

----Original Message----

From: Cheryl.Richardson@bridge.bellsouth.com [mailto:Cheryl.Richardson@bridge.bellsouth.com]

Sent: Friday, December 01, 2000 11:11 AM

To: Williamson, Jill R, NCAM

Cc: Sandra.Jones5@bridge.bellsouth.com;
Cheryl.Richardson@bridge.bellsouth.com;
Ranae.Stewart1@bridge.bellsouth.com

Subject: GA1000 OS/DA Test using Line Class Codes (LCCs)

Importance: High

Jill,

I have investigated this issue. The line class codes were installed in the correct switch, 5E, in the Peachtree Place Central Office. However, our service order generator system was programmed to add the line class codes to TNs out of the DMS switch, which I understand does not help AT&T in testing OS/DA with the GA1000 trial.

Ranae is taking this issue to IT to find out when the necessary correction can be made.

We will keep you informed.

Sincerely, Cheryl Richardson AT&T Account Team

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION ATLANTA, GEORGIA

In the Matter of:)	
)	
BellSouth Telecommunications, Inc.'s)	
Entry into InterLATA Services Pursuant)	Docket No. 6863-U
To Section 271 of the Telecommunication	ns)	
Act of 1996.)	
BellSouth Telecommunications, Inc.'s)	
Statement of Generally Available Terms)	Docket No. 7253-U
and Conditions under Section 252(f) of)	
the Telecommunications Act of 1996.)	

AFFIDAVIT OF W. KEITH MILNER

NOVEMBER 21, 2000

W. Keith Milner, being duly sworn, deposes and says:

1. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth Telecommunications, Inc. ("BellSouth"). The purpose of this affidavit is to provide the Commission with the most current information concerning unbundled network elements, interconnection services, and resold services furnished by BellSouth.

Checklist Item No. 1 (Interconnection)

2. As of September 30, 2000, BellSouth had provisioned 92,409 trunks interconnecting BellSouth's network and 28 facility-based CLECs' networks in Georgia, (that is, trunks between CLECs' switches and BellSouth's switches) including AT&T, MFS, MCImetro, MediaOne, and US LEC. In its nine-state region, BellSouth had installed 351,380 interconnection trunks from CLECs' switches to BellSouth's switches as of September 30, 2000.

Checklist Item No. 2 (Unbundled Network Elements)

- 3. In 1998, BellSouth received 181 physical and 73 virtual collocation requests in Georgia. In 1999, BellSouth received 455 physical and 96 virtual collocation requests in Georgia. In 2000, year-to-date as of September 30, BellSouth received 697 physical and 41 virtual collocation requests. In Georgia, collocation growth has been concentrated in the metro Atlanta exchanges. As of September 30, 2000, 26% of all physical collocation arrangements in Georgia were in the Atlanta exchange and 52% were in the Metro Atlanta exchanges. Similarly, for the same time period, 34% of all virtual collocation arrangements in Georgia were in the Atlanta exchange and 45% were in the Metro Atlanta exchanges.
- 4. The tremendous growth in the number of collocation requests and the concentrated nature of such requests has, in the past, caused some delays in

the provisioning of physical collocation. To address this issue, BellSouth has taken steps to better manage the process in light of the growth in demand. A new group called the Centralized Collocation District (CCD) was established in January 2000 to off-load certain functions from various line organizations so that the line organizations can focus more on meeting the specific needs of BellSouth's collocation customers. The primary purpose of the CCD is to reduce the cycle time on collocation requests. A program management group has been assigned within the CCD to track and ensure that all collocation requests are processed in a timely fashion.

- 5. In Georgia, BellSouth had completed 526 physical collocation arrangements, and 158 additional physical collocation arrangements are in progress as of September 30, 2000. CLECs requesting physical collocation in Georgia include AT&T, MCImetro, MFS, COVAD, Mpower, and NEXTLINK.
- 6. BellSouth also is providing virtual collocation to CLECs in Georgia in 43 different central offices in 28 different cities. In Georgia, as of September 30, 2000, there were 128 virtual collocation arrangements in place, with another 12 virtual collocation arrangements in progress. Allegiance, MediaOne, and Mpower are among the CLECs that have made the most significant number of requests for virtual collocation from BellSouth in Georgia.
- 7. BellSouth provides access to unused transmission media, which in some cases is referred to as "Dark Fiber". (SGAT §II.B.7) BellSouth has no such arrangements in place in Georgia because to date no CLEC has requested such; however, there are ten (10) CLECs with dark fiber arrangements in place in three (3) states within BellSouth's nine-state region.

Checklist Item No. 3 (Poles, Ducts, Conduits, and Rights-of-Way)

8. As of November 8, 2000, there were 83 CLECs, including 43 that operate in Georgia, that have executed license agreements with BellSouth that allow them to attach their facilities to BellSouth's poles and/or place their facilities in BellSouth's ducts and conduits. CLECs operating in Georgia that have executed license agreements include MCImetro, Knology, Hyperion, Nextlink, TCG, Vyvx, Mpower, Level 3, and MFS. In addition, BellSouth has been providing cable television companies with access to poles, ducts, conduits, and rights-of-way for many years. Since July 1997, BellSouth has received and successfully responded to 798 requests for access to poles, ducts, conduits, and rights-of-way from 22 CLECs operating in Georgia. BellSouth has never denied an application/request when facilities/structures were available.

Checklist Item No. 4 (Loops)

- 9. As of September 30, 2000, BellSouth had provisioned 64,117 unbundled loops to 22 CLECs in Georgia, including 2,384 two-wire ADSL loops, 112 two-wire HDSL loops, and seven (7) four-wire HDSL loops. The majority of the unbundled loops were provided to Allegiance, KMC, and COVAD. As of that same date, BellSouth had provisioned 237,685 unbundled loops to CLECs in its nine-state region, including 8,356 two-wire ADSL loops, 380 two-wire HDSL loops, and 22 four-wire HDSL loops. The unbundled loops BellSouth provides to CLECs are of a quality equal to that of the loops BellSouth uses in the provision of its retail services, and are provided using the same equipment and technical specifications that BellSouth uses for itself.
- 10. BellSouth arbitrated the question of providing access to unbundled loops served by IDLC in each of its nine in-region states. In Georgia, this issue was raised in Docket 6801-U (AT&T), Docket 6865-U (MCI), and Docket 10854-U

(ITC^DeltaCom). In these arbitration proceedings, the Georgia PSC held that where loops are served by IDLC, BellSouth had to provide unbundled access through one of eight approved methods and BellSouth is in compliance with this Commission's Order.

Checklist Item No. 5 (Transport)

11. As of September 30, 2000, BellSouth had provided 1,889 dedicated local transport trunks to CLECs in Georgia, including MediaOne, Mpower, and KMC. BellSouth had provided 8,723 dedicated trunks for interoffice transport to CLECs in its nine-state region as of that same date. For common transport, CLEC traffic follows transmission paths identical to BellSouth's traffic, using the routing tables in BellSouth's central office switches.

Checklist Item No. 6 (Switching)

- 12. As of September 30, 2000, BellSouth had provided 321 unbundled switch ports and 47,798 unbundled combinations (loop and switch port) to CLECs in Georgia. Region-wide, BellSouth had provided 362 unbundled switch ports and 137,867 unbundled loop and switch port combinations to CLECs as of that same date, which evidences the availability of unbundled local switching from BellSouth. Many CLECs are providing their own switching capabilities and are interconnecting their networks to BellSouth's network via the interconnection trunks discussed earlier.
- 13. Customized routing (which has also been referred to as selective routing) allows the calls from a CLEC's customer served by a BellSouth switch to reach the CLEC's operator service or directory assistance service platforms instead of BellSouth's operator service and directory assistance service platforms.
 BellSouth makes available two different methods for customized routing.

- Customized routing using the first method, Line Class Code, is available to all CLECs in Georgia and throughout BellSouth's nine-state region.
- 14. BellSouth's second method for providing selective routing is through the use of BellSouth's Advanced Intelligent Network (AIN) platform. A technical trial of customized routing using BellSouth's AIN platform commenced in Louisiana, in August 1998, and was successfully completed in September 1998. A second trial commenced in May 1999 and successfully completed in August 1999. This method is available to CLECs in addition to the Line Class Code method.
- 15. BellSouth has not denied any requests for selective routing due to a lack of line class code capacity, and given the level of demand for selective routing experienced to date, there is no reason to believe that there is imminent danger of exhaustion of line class codes.

Checklist Item No. 7 (911 and E911, Directory Assistance and Operator Services

- As of September 30, 2000, CLECs in Georgia have requested and BellSouth has provided 879 E911/911 trunks. In its nine-state region, as of that same date, BellSouth had provided 3,062 trunks connecting CLECs' switches with BellSouth's E911 arrangements. In its nine-state region, 58 CLECs were sending mechanized updates to BellSouth for inclusion in the 911 database as of September 30, 2000. Those mechanized updates include both end user customers to whom CLECs provide service via the resale provisions of the Act as well as those end user customers to whom facilities-based CLECs provide service from the CLECs' own switches or through the use of unbundled switch ports provided by BellSouth.
- 17. With respect to operator services and directory assistance, BellSouth has parity by design in that the flow of service orders from various sources (BellSouth's

retail units, CLEC resale, CLEC UNE, and CLEC UNE and resale with customized routing) is precisely the same regardless of the source of the service order. Universal Service Order Codes ("USOCs") on the service orders are used to establish switch translations that provide dial tone and various service features listed on each service request. The exact same list of USOCs, with the exception of four unique provisioning USOCs used for UNEs, is used on both BellSouth and CLEC orders to describe various features and functions. If the service order being processed is for a CLEC, it contains a special four-digit Field Identifier Code ("FID") that ultimately identifies the CLEC to the billing system. However, the FID is <u>not</u> input to the switch. Thus the switch is "blind" as to whether a given end user customer is BellSouth's customer or a CLEC's customer. The service orders enter a system called the Line Class Code Assignment Module ("LCCAM"). The LCCAM converts the USOCs assigned on service orders to a Line Class Code ("LCC"), a three-character entry that identifies the routing and screening characteristics of that line to the switch. Nothing in the LCC distinguishes a BellSouth customer from a CLEC customer. The LCC information flows into a computer system named MARCH. MARCH is a memory administration system that translates line-related service order data into switch provisioning messages and automatically transmits the messages to targeted stored program control system switches. Routing, screening, and trunking of calls by the switch are identical for lines containing identical LCCs. Therefore, it is not necessary to perform measurements beyond this point in the process to demonstrate parity in the handling of operator services and directory assistance calls. The LCCAM to MARCH handoff merges traffic from all sources into a single flow determined solely by LCCs.

- 18. The Traffic Operator Position System ("TOPS") Queuing Management System ("QMS") is where calls are initially queued based on call origination type. For example, a determination is made whether the call originated from a coin trunk group or a directory assistance trunk group. Next, calls are ordered based on whether or not they have previously received some form of automated treatment or operator handling. Then the calls are processed through six refinement tables to enable them to be handled by operator groups best equipped to handle specific types of calls. For example, this process routes calls requiring fluency in a particular language to operators with skills in that language. Finally, the calls are routed to queues based on such factors as the age of the call, equipment availability, and force management considerations. As a result, treatment of CLECs' customers' calls to BellSouth's TOPS platform are handled in a nondiscriminatory manner at parity with the treatment of calls from BellSouth's retall customers.
- 19. BellSouth provides CLECs with Directory Assistance Access Service (DAAS), which allows CLEC end users to obtain telephone listing information from BellSouth. CLECs also have access to BellSouth's Directory Assistance Call Completion (DACC) service, which gives the CLEC's end user the option to have a call to BellSouth's Directory Assistance (DA) completed automatically to the requested telephone number. Facilities-based CLECs obtain access to these services through trunks connecting the CLEC's point of interface to BellSouth's DA platform. As of September 30, 2000, BellSouth had provided 528 directory assistance trunks to CLECs in Georgia. In BellSouth's nine-state region, BellSouth had provided 2,547 directory assistance trunks to CLECs as of that same date. As of October 31, 2000, sixteen (16) CLECs were purchasing DAAS

- and nine (9) CLECs were purchasing DACC from BellSouth in Georgia. These include e.spire, ICI, MCImetro, MediaOne, MFS, and Mpower. In its nine-state region, 39 CLECs were purchasing DAAS and 27 CLECs were purchasing DACC from BellSouth as of that same date.
- 20. CLECs also have access to BellSouth's intercept service, which refers calls from a disconnected or non-working telephone number to the proper telephone number or announcement. Facilities-based CLECs obtain access to BellSouth's intercept service through dedicated trunk facilities. As of September 30, 2000, BellSouth had provided CLECs in Georgia with 28 intercept trunks. In BellSouth's nine-state region, BellSouth had provided 170 intercept trunks to CLECs as of that same date.
- 21. BellSouth provides CLECs and other service providers with access to BellSouth's Directory Assistance Database Service (DADS). This allows the CLEC to use BellSouth's subscriber listing information to set up their own directory assistance services. BellSouth also provides CLECs and other service providers with access to BellSouth's Direct Access to Directory Assistance Service (DADAS), which gives CLECs direct access to BellSouth's DA database in order to provide a traditional directory assistance service. BellSouth currently provides both DADS and DADAS to CLECs and to various third-party service providers, which in turn furnish the service to CLECs. As of September 30, 2000, nine (9) service providers in Georgia were using BellSouth's DADS.

 Twelve (11) service providers were using DADS across BellSouth's nine-state region as of that same date. As of September 30, 2000, one (1) third party service providers were using DADAS in Georgia to provide service to CLECs. Two (2) third party service providers were using DADAS across BellSouth's nine-state

- region as of that same date. BellSouth provides requesting carriers all subscriber listings in its databases, including those from CLECs and independent carriers.
- Operator call processing, which allows CLECs to obtain both live operator and mechanized functionality, is available from BellSouth. Facilities-based CLECs can obtain access to BellSouth's operator call processing by connecting to BellSouth's operator services platform. As of September 30, 2000, BellSouth had provided 395 operator services trunks to CLECs in Georgia, including Mpower, US LEC, Teleport, and KMC. Across its nine-state region, BellSouth had provided CLECs with 2,521 operator services trunks as of that same date. In Georgia, BellSouth had provided CLECs 59 verification trunks as of September 30, 2000. Across its nine-state region, BellSouth had provided CLECs with 423 verification trunks as of that same date.

Checklist Item No. 9 (Numbering Administration)

23. During February 1998, Lockheed-Martin assumed the North American Numbering Plan Administrator (NANPA) functions previously provided by Bell Communications Research, Inc. (Bellcore). This did not include the central office code assignment and Numbering Plan Administration (NPA) relief planning functions that continued to be performed by the Incumbent Local Exchange Carrier (ILEC) serving the particular geographic territory until a transition plan could be finalized to transfer these functions to Lockheed-Martin. The central office code assignment function was transferred to Lockheed-Martin on a region-by-region basis based on an industry accepted transition plan. Specifically for BellSouth, that transition began July 6, 1998, and concluded August 14, 1998.
NeuStar assumed all NANPA responsibilities on November 17, 1999 when the

- FCC approved the transfer of Lockheed-Martin's Communication Industry
 Service division to NeuStar.
- 24. Responsibility for NPA relief planning has also transitioned to NeuStar. When BellSouth was responsible for NPA relief planning and a NPA was found to be in jeopardy of exhausting before a NPA relief plan could be implemented, the BellSouth Central Office Code Administration Center implemented code conservation measures complying with consensus decisions of the local industry as expressed in one or more Industry Jeopardy Meetings. NANPA now has the responsibility for jeopardy declaration in a given NPA, with current jeopardy situations in Georgia existing in the 678 NPA and the 912 NPA.
- 25. BellSouth, while serving as the Central Office Code Administrator for its territory, maintained neutrality in performing the code administration functions and ensured that CLECs had nondiscriminatory access to telephone numbers for assignment to their customers. BellSouth adhered to the code administration guidelines published by the Industry Numbering Council (INC); a national industry body under the Carrier Liaison Committee (CLC) sanctioned by the Alliance for Telecommunications Industry Solutions (ATIS). INC documents, including final documents, completed guidelines, and issue resolutions in final closure, are readily accessible via the Internet, at (http://www.atis.org/atis/clc/inc/inchom.htm). These guidelines provide instructions to all service providers including CLECs as to how to request and have NPA/NXX codes assigned. BellSouth established procedures to provide nondiscriminatory NXX code assignments to CLECs that conform to the INC standards. Pursuant to these procedures. BellSouth had assigned a total of 459 NPA/NXX codes for CLECs in Georgia as of August 19, 1998. In its nine-state

- region, BellSouth had assigned 2,141 NPA/NXX codes for CLECs as of August 19, 1998. Other than in impending NPA exhaust situations, no requests from CLECs for NPA/NXX code assignments were refused by BellSouth either in Georgia or in BellSouth's nine-state region. BellSouth has never charged wireline providers for number administration and did not charge any carriers for number administration after 1996.
- Since the Central Office Code Administration function has been transferred to the NANPA (now NeuStar), BellSouth no longer has any responsibility for the administration or assignment of central office codes (NXXs) to CLECs or any other telecommunications service provider. BellSouth follows the Central Office Code (NXX) Assignment Guidelines developed by the INC in submitting BellSouth's NXX code requests to NANPA, entering code information into the appropriate national databases, activating in BellSouth's network NXX codes assigned to any service provider, making available BellSouth NXX codes that are no longer in use, and all other areas covered by these and other appropriate industry guidelines. It is now NANPA's responsibility to supply competitively neutral number administration services and to ensure that all service providers have equal and non-discriminatory access to telephone numbers.
- 27. BellSouth furnishes data to NANPA (currently NeuStar). For example, BellSouth provides the following: (1) COCUS Report BellSouth prepares a Central Office Code Utilization Survey (COCUS) Report and forwards it to NANPA pursuant to FCC directives. NANPA uses the COCUS Reports from all carriers to estimate when all NPAs (area codes) will exhaust. (2) Months-to-exhaust Worksheet When BellSouth requests a new central office code assignment for growth from NANPA CO Code Administration, BellSouth submits a Months-to-Exhaust

- Worksheet that shows when the existing supply of telephone numbers in the central office will exhaust. (3) Part 4 New central office codes must be put to work within six months of being assigned or returned to NANPA. This is accomplished by the Code Holder who furnishes NANPA a Part 4 Form informing NANPA that the NXX has been put to work.
- 28. Where Number Pooling is in place, carriers must report additional items to the Pooling Administrator. Such data includes contamination levels of thousands blocks within assigned central office codes. However, pooling has not yet been implemented within any NPA that BellSouth serves so none of this reporting has yet been initiated.

Checklist No. 10 (Database and Signaling)

- 29. From January 1997 through October 2000, CLECs and other service providers across BellSouth's nine-state region completed approximately 5.2 billion queries to BellSouth's Toll Free Number database. Additional facilities-based CLECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Once the CLEC puts the required signaling links in place, access to the Toll Free Number database is available.
- 30. BellSouth's region-wide Line Information Database (LIDB) processed more than 1.4 billion queries from CLECs and others during the period January 1997 through September 2000. Access to the LIDB is at present through a third party "signaling hub" provider or interexchange carrier directly connected to BellSouth's signaling network. LIDB queries are billed to the third party "signaling hub" provider or interexchange carrier, not the CLEC. Accordingly, of the more than 1.4 billion queries completed, BellSouth cannot separate out the number completed by facilities-based CLECs. Facilities-based CLECs can,

- however, obtain access to the database as described in BellSouth's tariff (FCC No. 1). Once the CLEC puts required signaling links in place, access to the LIDB database is available.
- 31. As of September 30, 2000, there were 18 facilities-based CLECs directly connected to BellSouth's signaling network and another nine (9) are interconnected by using a third-party signaling hub provider which in turn accesses BellSouth's signaling network. Additional facilities-based CLECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Once the CLEC puts the required signaling links in place, access to the signaling network is available.
- 32. Because BellSouth's Signal Transfer Point (STP) does not distinguish between BellSouth's end users and the end users of resellers, BellSouth does not know how many queries have been made to BellSouth's databases from the end-user customers of resellers.

Checklist Item No. 11 (Number Portability)

33. Interim number portability (INP) is available from BellSouth in accordance with applicable FCC requirements. BellSouth offered interim number portability under four methods which the Commission found to be technically feasible: (1) Remote Call Forwarding (RCF) and Direct Inward Dialing (DID); (2) Route Index-Portability Hub (RI-PH); (3) Directory Number-Route Index (DN-RI); and (4) Local Exchange Routing Guide (LERG) Reassignment. BellSouth agreed in certain interconnection agreements (for example, AT&T's agreement) to provide Route Index-Portability Hub (RI-PH) as a comparable arrangement in provisioning interim number portability. Similarly, BellSouth has agreed in certain interconnection agreements (for example, AT&T in connection with the AT&T

- Arbitration in North Carolina Docket No. P-140, SUB 50) to provide interim number portability using the LERG Reassignment method.
- 34. As of September 30, 2000, BellSouth had successfully ported 4,012 business directory numbers and 655 residence directory numbers for CLECs in Georgia using interim number portability ("INP") solutions. The predominant CLECs requesting INP with respect to business directory numbers are e.spire and KMC. As of September 30, 2000, Mpower and Knology were the primary CLECs with ported residence directory numbers. In its nine-state region, BellSouth had ported 37,447 business and 922 residence directory numbers as of September 30, 2000, which evidences the availability of INP.
- 35. As to the implementation of a long-term number portability ("LNP") solution,
 BellSouth has implemented permanent number portability in Georgia in
 accordance with FCC rules. As of September 30, 2000, BellSouth had ported
 207,987 business directory numbers and 45,104 residence directory numbers in
 Georgia using LNP. In its nine-state region, BellSouth had ported 855,240
 business and 87,641 residence directory numbers as of September 30, 2000,
 which evidences the availability of LNP.

Checklist Item No. 14 (Resale)

- 36. CLECs are reselling significant quantities of BellSouth's retail telecommunications services. Exhibit WKM-1, which is attached to this affidavit, identifies the service and the number of units being resold in Georgia and BellSouth's nine-state region as of September 30, 2000.
- 37. This concludes my affidavit.

I hereby swear that the foregoing is true and correct to the best of my information and belief

W. Keith Milner

Senior Director-Interconnection Services

BellSouth Telecommunications, Inc.

Subscribed and swom to before me this 2/5/

Day of 7 Queenly

, 2000.

Notary Public

SERVICE NESALE - UNITS IN SERVICE SEPTEMBER 30, 2000

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ACCUPULSE #1			_			and the second				
AREA PLUS #2	2,473	8,865	5.827	1.367	7,612	2817	75			7
BASIC RATE ISDN #3	176	632	710	176	577	146	177	2,244	4,619	36,480
PRIMARY RATE ISDN #4	41	210	101	13	210			007	7117	3,317
CALL WAITING #5	18,176	31,	56,	9,246	36.722	25.578	90 BKB	18 222	74 50	824
CALL WAITING DELUXE #6	4,636	13,905	18,758	1.730	6,127	3.420	6 10K	1 110	1/304	734,544
CALLER ID DELUXE #7	12,720	32,985		7,898	23,454	19.383	13 996	0 336	CO'C	60,250
CALLER ID ENHANCED #8	185	1,046	334	121	253	121	29	211	13,043	1/8,150
CENTREX/ ESSX # 9	1,252	1,218	6,318	1,157	1.298	1.038	7 287		133	2,382
CUSTOM CALLING - 3 WAY CALLING #10	4,595	19,138	26,930	1.582	8.001	\$ 004	476.5	4,117	334	19,021
CUSTOM CALLING - CALL FORWARDING VARIABLE #11	6,051	162,71	15,408	2.413	8.114	4 703	150 7	3 300	0.551	79,546
CUSTOM CALLING - REMOTE ACCESS TO CF #12	294	3,115	1,211	205	386	111	366	366	3,093	69,613
CUSTOM CALLING - SPEED CALLING 8 & 30 #13	4,505	12,040	21,676	1,441	4.346	2.661	\$ 645	900	507	6383
DID#14	434	1,162	1,089	38	1.00	4	463	133	(/04/	61,050
E911/SALI #15		•			•		2	200	710	075-6
ENH CID/MULTILINE CID DELUXE/RNH CID ACR #16	7	360	142	Ξ	61	1	=	92		
FLAT RATE PBX TRUNKS #17	875	4,246	3,087	1,061	730	582	37.6	1 18		910
FLAT RATE RESIDENCE #18	33,237	58,845	90,287	19.404	59.265	11917	-	36 730	477	12,274
FLAT RATE/BASIC LOCAL EXCHANGE # 19	18,652	86,407	41,797	14.635	17.939	3.713		30,730	35,720	374,170
FLEXSERV #20	-	47	79		91	20,5	-	12,040	7,400	212,240
FRAME RELAY AND CDS #21	204	348	1.402	*	<u> </u>	. 135	183			233
GEORGIA COMMUNITY CALLING #22			1.889			2	/67	0	/8	2,830
HUNTING#23	11.051	48.275	21.185	R 570	10 691	1000				1,889
INDEPENDENT PAYPHONE PROVIDER #24	159	4.239	1.288	776	2020	3,000	20/491	13,983	4,604	138,039
INTEGRATED PACKAGES #25	1 797		086		200	700	•	RCI	996	9,530
LIGHTGATE #26			1,000	2	11,388	13,217	660,69	<u>2</u>	3,026	102,446
MEASURED RATE BUSINESS # 27	291	1676	202	. 6					•	-
MEASURED RATE RESIDENCE #28		7.	461				299	7/7	579	4,883
MEGALINK #29	592	12	100	2	177		•	3,	83	1,055
MEGALINK ISDN # 30	-	-	-	3	200	70	167	71	28	2238
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MESSAGE TELEPHONE SERVICE (MTS) #32	3	101	10 P	910	15/5	5	5,162	3,112	1,921	41,023
MEASURED RATE PBX TRUNKS #33	366	4310	472	3	000	6		\$ 1	57	515
MULTISERV #34	78	1.651	2.598	201	102	255	17,500	ô	9//	8,974
NATIVE MODE LAN INTERCONNECTION #35						2	S .	9679	2	5,951
OFF PREMISE EXTENSIONS (OPX) # 36	78	200	137	5	263	۶	. 5			
OPTIONAL CALLING PLAN # 37	125	615	393	345	767	282	160	2 413	2 6	S S
REMOTE CALL FORWARDING (RCF) #38	328	3,280	1,662	163	517	214	280	200	300	9 60
RINGMASTER#39	793	2,917	2,989	478	916	897	1.002	28	1334	17.001
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BellSouth Telecommun. Jons, Inc. GPSC Docket Nos. 6663-U17253-U Exhibit WKM-1

> SERVICE MESALE - UNITS IN SERVICE SEPTEMBER 30, 2000

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	171		11 346		19.162	900	4,007	7163	3	TPL		11.874	-	138 246		•	:	267.460		
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CERTIFICATE OF SERVICE 6863-U/7253-U

This is to certify that I have this day served a copy of the within and foregoing, Affidavit of W. Keith Milner, upon all known parties of record, by depositing in the United States Mail, addressed as follows:

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> JMB-R3 Page 19 of 21

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Docket No. 000731-TP JMB-R3 Page 20 of 21 This 21" of November, 2000.

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BENNETY LINOSS

General Counsel - Georgia

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141847

^ SR 271 Library

From:

irwilliamson@att.com

Sent:

Monday, June 05, 2000 1:50 PM

To:

sr271lib@lga.att.com

Subject:

FW: Interim Change Control Process

importance:

High

----Original Message---

From: sandra k evans [mailto:sandra.k.evans@mail.sprint.com]

Sent: Tuesday, April 18, 2000 5:06 PM

To: sharon.arnett@openmail.mail.sprint.com; BellSouth@quintessent.net; brian.powers@onepointcom.com; brutter@kpmg.com; bszafran@covad.com;

c_and_m@bellsouth.net; cecilia.ortiz@adelphiacom.com; Change.Control@bridge.bellsouth.com; cheryl@eatel.com; CPolizzotti@northpoint.net; Craig.B.Douglas@MCl.com; Craig@exceleron.com; dana.braun@adelphiacom.com;

Debra.Pasquale@btitele.com; dfoust@deltacom.com; dlasher@eftia.com;

DoBeck@Mediaone.com; donnas@intetech.com; dpetry@ix.netcom.com;

drodrigu@accessone.cc; Dwight.Scrivener@wcom.com;

epadfield@nextlink.com; sandra.k.evans@openmail.mail.sprint.com;

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rithompson@nextlink.com; RSchell@rhythms.net; Sandrajf@intetech.com;

sbowling@caprock.com; shane@eatel.com; sharon.russo@btitele.com;

sienning@nowcommunications.com; smason@interloop.net;

srober@kmctelecom.com; steve.taff@allegiancetelecom.com;

TAYLORJG@LCI.COM; tbrooks@mantiss.com; TLA@magicnet.net;

tmontemayer@mantiss.com; Todd@CSII.net; tvercellotti@mantiss.com; Tyra.Colbert@wcom.com; wmknapek@intermedia.com; wmontano@uslec.com;

wolfsbrg@cris.com; WWalker@mantiss.com Cc: jim.a.lenihan@openmail.mail.sprint.com

Subject: Interim Change Control Process

Importance: High

Change Control,

Due to past experience with BellSouth's Change Management Process, Sprint does not agree with the New/Interim Change Control Process becoming a baseline at the end of 3 months without a review. The original Change Management Process formed a Steering Committee for the purpose of reviewing the process and suggest changes. Few of the requested changes were implemented. Currently there is no way to introduce changes to the process. The new process eliminates the Steering Committee without creating a User's Forum or some other means for CLECs to request changes to the CCP.

Sprint does not agree with the following processes included in the New/Interim Change Control Process:

- Definition of a defect versus feature changes. Lack of testing support and environment. Lack of a solid question resolution process.
- The dispute Resolution Process needs re-defined.

Docket No. 000731-TP JMB-R4 Page 1 of 11

- Carrier Notifications process. An email should also be included in these type of notifications.
 Retirement of systems.
- Interval of Type 2-5 notifications are too long.

Again Sprint cannot agree to this New/Interim Change Control process as long as the above issues remain open and no resolution process in place to work through these and future issues.

Sandy Evans Product Manager Sprint National Integrated Services 913-433-8499

^ SR 271 Library

From:

irwilliamson@att.com

Sent:

Monday, June 05, 2000 1:52 PM

To:

sr271lib@lga.att.com

Subject:

FW: Update on Pending Change Requests

----Original Message----

From: sandra k evans [mailto:sandra.k.evans@mail.sprint.com]

Sent: Thursday, March 23, 2000 3:20 PM To: sharon.amett@openmail.mail.sprint.com;

brian.powers@onepointcom.com; brutter@kpmg.com; bszafran@covad.com;

c_and_m@bellsouth.net; Change.Control@bridge.bellsouth.com;

cheryl@eatel.com; CPolizzotti@northpoint.net; Craig.B.Douglas@MCl.com;

Craig@exceleron.com; dbraun@adelphia.com; Debra.Pasquale@btitele.com;

dfoust@deltacom.com; dlasher@eltia.com; DoBeck@Mediaone.com;

donnas@intetech.com; dpetry@ix.netcom.com; drodrigu@accessone.cc;

sandra.k.evans@openmail.mail.sprint.com; Gary@CSII.net;

generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com;

Jdavid4715@aol.com; JDoherty@accessone.cc; jeffrey@cellularsouth.com;

jhoze@kmctelecom.com; JMMaxwell@intermedia.com;

JOSEPH.ONEAL@adelphiacom.com; Williamson, Jill R, NCAM; Wilson Jr, Jack

T (Tom), BGM; kelley.dunne@onepointcom.com; Kimberly.O.Williams@MCl.com;

kmiller@northpointcom.com; lhall@floridadigital.net;

Lminasola@Mediaone.com; Mark.E.Turner@MCI.com;

mconquest@itcdeltacom.com; microsun@bellsouth.net;

Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@Mediaone.com;

Pkingbom@eztalktelephone.com; Sandrajf@intetech.com;

sbowling@caprock.com; shane@eatel.com; sharon.russo@btitele.com;

sjenning@nowcommunications.com; srober@kmctelecom.com;

.teve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM; tbrooks@mantiss.com:

TLA@MAGICNET.NET; tmontemayer@mantiss.com; Todd@CSII.net;

tvercellotti@mantiss.com; Tyra.Colbert@wcom.com;

wmknapek@intermedia.com; wmontano@uslec.com; wolfsbrg@cris.com;

WWalker@mantiss.com

Cc: jim.a.lenihan@openmail.mail.sprint.com

Subject: RE: Update on Pending Change Requests

Change Control Team.

Sprint concurs with AT&T that the below examples should be treated as a Defect. The possibly of delaying or completly shutting down the electronic process of the order flow is detrimental to the CLEC. If a maunal work around is suggested or used until the electronic process is corrected, the impact to both the CLEC and BST is great. The manual processes require more time, headcount, and allows for more errors. This is not acceptable to Sprint. Thus the below examples should be treated as a Defect and requiring the same resolution timeframe as a Defect.

Sandy Evans Product Manager II Sprint National Integrated Services 913-433-8499

----Original Message----

To:

From: jrwilliamson [SMTP:jrwilliamson@att.com]

Sent: Thursday, March 23, 2000 12:14 PM

Change.Control; Arnett, Sharon A.; TLA; PBarker; PBohn;

Docket No. 000731-TP JMB-R4 Page 3 of 11 sbowling; dbraun; tbrooks; bszafran; Tyra.Colbert; mconquest; CPolizzotti; Jdavid4715; DoBeck; JDoherty; Craig.B.Douglas; kelley.dunne; jason.estep; Evans, Sandra K.; george; dfoust; generalg; lhall; jhoze; Craig; sjenning; Sandrajf; Pkingborn; wmknapek; dlasher; JMMaxwell; c.and.m; Gary; Todd; kmiller; Lminasola; wmontano; tmontemayer; Nicole.Moorman; JOSEPH.ONEAL; Debra.Pasquale; dpetry; brian.powers; microsun; cheryl; jeffrey; srober; drodrigu; sharon.russo; brutter; shane; donnas; steve.taff; TAYLORJG; Mark.E.Turner; tvercellotti; WWalker; Kimberly.O.Williams; jtwilson2; wolfsbrg

Cc: jrwilliamson

Subject: RE: Update on Pending Change Requests

Importance: High

Valerie,

In response to your update, I disagree on BellSouth's assessment of my

requests for the following reasons.

DEF030100_002 (Pre-Order and Order Business Rule Discrepancies) While BellSouth may not consider this a systems defect based on the fact

that the systems was designed as such, I consider it a defect in the design

of the system. For example, BeilSouth may allow for 15 characters to be

sent to me out of RSAG for a certain field, but only allows for 9 characters

on the order. If RSAG gives me back a value greater than 9 (its designed to

accommodate more), I cannot place a firm order because of the way the ordering system is designed. Regardless, I cannot send the order and my

production is impacted.

DEF030200_001 (RPON Business Rules and Error Messages)
You hit on my point exactly when you stated that there is no business rule

defined for rejecting RPON'd orders. BellSouth does not have any documented

rules around RPON'ing of orders not does it have a reject code specifically

for RPON'd orders. We've been told that we can relate the orders sequentially or relate all orders to the first order, but neither seems to

generate a consistent result from BellSouth. We've been told that when

BellSouth rejects one order in a group of RPON'd orders, it will reject all

of the related orders. However, this does not always occur. Sometimes all

of our orders are rejected and sometimes only one is rejected and the related PONs are FOC'd. In order for us to solidify our M&Ps and build

consistency in our process, BellSouth must document its rules around RPON'ing of orders.

Sincerely,

Jill Williamson
AT&T Local Services and Access Management

JMB-R4 Page 4 of 11 ----Original Message----

From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com] Sent: Wednesday, March 22, 2000 5:20 PM

To: sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com;

PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com; tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com;

mconquest@itcdeltacom.com; CPolizzotti@northpoint.net;

Jdavid4715@aol.com; DoBeck@Mediaone.com; JDoherty@accessone.cc;

Craig.B.Douglas@MCl.com; kelley.dunne@onepointcom.com;

jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com;

george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com;

Ihall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com;

sjenning@nowcommunications.com; Sandrajf@intetech.com;

Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com;

dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net;

Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;

Lminasola@Mediaone.com; wmontano@usiec.com; tmontemayer@mantiss.com;

Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com;

Debra.Pasquale@btitele.com; dpetry@ix.netcom.com;

brian.powers@onepointcom.com; microsun@bellsouth.net;

cheryl@eatel.com;

jeffrey@cellularsouth.com; srober@kmctelecom.com;

drodrigu@accessone.cc;

sharon.russo@btitele.com; brutter@kpmg.com; shane@eatel.com;

donnas@intetech.com; steve.taff@allegiancetelecom.com;

TAYLORJG@LCI.COM:

Mark.E.Turner@MCI.com; tvercellotti@mantiss.com; WWalker@mantiss.com;

Kimberly.O.Williams@MCl.com; Williamson, Jill R, NCAM; Wilson Jr,

Jack T

(Tom), BGM; wolfsbrg@cris.com

Subject: Update on Pending Change Requests

Attention CLECs:

Attached are updates on two pending change requests:

DEF030100_002 (Pre-Order and Order Business Rule Discrepancies)

This issue has been reclassified as a feature. The field

discrepancies

identified by this request were designed and implemented according to

the

original user requirements. BellSouth is investigating this change

for

implementation in a future release.

DEF030200_001 (RPON Business Rules and Error Messages)

This issue has been reclassified as a feature. There is not a

business

defined

where a related PON is rejected because one other or several others

that are

related are rejected. This issue has been referred to our

documentation

staff

for review.

We will keep you posted with the status. Please let us know if you have any

questions.

JMB-R4
Page 5 of 11

Thanks,

Change Control Team

^ SR 271 Library

From: Sent: irwiliiamson@att.com

Monday, June 05, 2000 1:52 PM

To:

sr271lib@iga.att.com

Subject:

FW: Update on Pending Change Requests

----Original Message----

From: Tyra Colbert [mailto:tyra.colbert@wcom.com]

Sent: Thursday, March 23, 2000 3:16 PM

To: Williamson, Jill R, NCAM; Change.Control@bridge.bellsouth.com: sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com; PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com; tbrooks@mantiss.com; bszafran@covad.com; mconquest@itcdeltacom.com; CPolizzotti@northpoint.net; Jdavid4715@aol.com; DoBeck@Mediaone.com: JDoherty@accessone.cc; Craig.B.Douglas@wcom.com: kelley.dunne@onepointcom.com; jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com; george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com; lhall@floridadigital.net; ihoze@kmctelecom.com; Craig@exceleron.com; sienning@nowcommunications.com; Sandrajf@intetech.com; Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com: dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net; Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com: Lminasola@Mediaone.com; wmontano@uslec.com; tmontemayer@mantiss.com; Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com; Debra.Pasquale@btitele.com; dpetry@ix.netcom.com; brian.powers@onepointcom.com; microsun@bellsouth.net; cheryl@eatel.com; jeffrey@cellularsouth.com; srober@kmctelecom.com; drodrigu@accessone.cc: haron.russo@btitele.com; brutter@kpmg.com; shane@eatel.com; Jonnas@intetech.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM: Mark.E.Turner@wcom.com; tvercellotti@mantiss.com; WWalker@mantiss.com;

Bell South Change Control,

wolfsbrg@cris.com

I'm in agreement with AT&T (Jill Williamson) regarding this issue in that it needs to be handled as a priority. If the defect takes us out of business, it needs to handled in a expeditious manner. If Bell South identifies a work around we should expect some reasonable timeframe to resolve the issue, not just "investigating for a future release".

Kimberly.O.Williams@wcom.com; Wilson Jr, Jack T (Tom), BGM;

Subject: RE: Update on Pending Change Requests

Sincerely,

Tyra Colbert MCI WorldCom

- > ----Original Message-----
- > From: Williamson, Jill R, NCAM [mailto:jrwilliamson@att.com]
- > Sent: Thursday, March 23, 2000 1:14 PM
- > To: Change.Control@bridge.bellsouth.com; sharon.arnett@mail.sprint.com;
- > TLA@MAGICNET.NET; PBarker@aol.com; PBohn@Mediaone.com;
- > sbowling@caprock.com; dbraun@adelphia.com; tbrooks@mantiss.com:
- bszafran@covad.com; Tyra.Colbert@wcom.com; mconquest@itcdeltacom.com;
 CPolizzotti@northpoint.net; Jdavid4715@aol.com; DoBeck@Mediaone.com;
- > JDoherty@accessone.cc; Craig.B.Douglas@wcom.com;

```
> kelley.dunne@onepointcom.com; jason.estep@adelphiacom.com;
> sandra.k.evans@mail.sprint.com; george@accesscomm.com;
> dfoust@deltacom.com; generalg@cris.com; lhall@floridadigital.net;
> ihoze@kmctelecom.com; Craig@exceleron.com;
> sjenning@nowcommunications.com; Sandrajf@intetech.com;
> Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com;
> diasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net;
> Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;
> Lminasola@Mediaone.com; wmontano@uslec.com; tmontemayer@mantiss.com;
> Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com;
> Debra.Pasquale@btitele.com; dpetry@ix.netcom.com:
> brian.powers@onepointcom.com; microsun@bellsouth.net; chervl@eatel.com;
> jeffrey@cellularsouth.com; srober@kmctelecom.com; drodrigu@accessone.cc;
> sharon.russo@btitele.com; brutter@kpmg.com; shane@eatel.com;
> donnas@intetech.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM;
> Mark.E.Turner@wcom.com; tvercellotti@mantiss.com; WWalker@mantiss.com;
> Kimberly.O.Williams@wcom.com; Wilson Jr, Jack T (Tom), BGM;
> wolfsbrg@cris.com
> Subject: RE: Update on Pending Change Requests
> Importance: High
>
> Valerie,
> In response to your update, I disagree on BellSouth's assessment of my
> requests for the following reasons.
> DEF030100 002 (Pre-Order and Order Business Rule Discrepancies)
> While BellSouth may not consider this a systems defect based on the fact
> that the systems was designed as such, I consider it a defect in
> the design
> of the system. For example, BellSouth may allow for 15 characters to be
> sent to me out of RSAG for a certain field, but only allows for 9
characters
> on the order. If RSAG gives me back a value greater than 9 (its
> designed to
> accommodate more), I cannot place a firm order because of the way the
> ordering system is designed. Regardless, I cannot send the order and my
> production is impacted.
> DEF030200_001 (RPON Business Rules and Error Messages)
> You hit on my point exactly when you stated that there is no business rule
> defined for rejecting RPON'd orders. BellSouth does not have any
> documented
> rules around RPON'ing of orders not does it have a reject code
> specifically
> for RPON'd orders. We've been told that we can relate the orders
> sequentially or relate all orders to the first order, but neither seems to
> generate a consistent result from BellSouth. We've been told that when
> BellSouth rejects one order in a group of RPON'd orders, it will
> reject all
> of the related orders. However, this does not always occur.
> Sometimes all
> of our orders are rejected and sometimes only one is rejected and the
> related PONs are FOC'd. In order for us to solidify our M&Ps and build
> consistency in our process, BellSouth must document its rules around
> RPON'ing of orders.
> Sincerely,
> Jill Williamson
  AT&T Local Services and Access Management
```

```
> -----Original Message-
 > From: Change.Control@bridge.belisouth.com
 > [mailto:Change.Control@bridge.bellsouth.com]
> Sent: Wednesday, March 22, 2000 5:20 PM
 > To: sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com;
> PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com;
> tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com;
> mconquest@itcdeltacom.com; CPolizzotti@northpoint.net;
> Jdavid4715@aoi.com; DoBeck@Mediaone.com; JDoherty@accessone.cc;
> Craig.B.Douglas@MCl.com; kelley.dunne@onepointcom.com;
> iason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com;
> george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com;
> Ihall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com;
> sienning@nowcommunications.com; Sandraif@intetech.com;
> Pkingborn@eztalktelephone.com; wmknapek@intermedia.com;
> diasher@ettia.com; JMMaxwell@intermedia.com; c_and_m@bellsouth.net;
> Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;
> Lminasola@Mediaone.com; wmontano@uslec.com; tmontemayer@mantiss.com;
> Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com:
> Debra.Pasquale@btitele.com; dpetry@ix.netcom.com;
> brian.powers@onepointcom.com; microsun@bellsouth.net; cheryl@eatel.com;
> jeffrev@cellularsouth.com; srober@kmctelecom.com; drodrigu@accessone.cc;
> sharon.russo@btitele.com; brutter@kpmg.com; shane@eatel.com;
> donnas@intetech.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM:
> Mark.E.Turner@MCl.com; tvercellotti@mantiss.com; WWalker@mantiss.com;
> Kimberly, O. Williams @ MCI.com; Williamson, Jill R, NCAM; Wilson Jr, Jack T
> (Tom), BGM; wolfsbrg@cris.com
> Subject: Update on Pending Change Requests
> Attention CLECs:
> Attached are updates on two pending change requests:

    DEF030100_002 (Pre-Order and Order Business Rule Discrepancies)

> This issue has been reclassified as a feature. The field discrepancies
> identified by this request were designed and implemented according to the
> original user requirements. BellSouth is investigating this change for
> implementation in a future release.
> DEF030200_001 (RPON Business Rules and Error Messages)
> This issue has been reclassified as a feature. There is not a business
> defined
> where a related PON is rejected because one other or several
> others that are
> related are rejected. This issue has been referred to our documentation
> staff
> for review.
> We will keep you posted with the status. Please let us know if
> you have any
> questions.
> Thanks,
> Change Control Team
```

^ SR 271 Library

From: Sent: irwilliamson@att.com

Monday, June 05, 2000 1:52 PM sr271lib@lga.att.com

To: Subject:

FW: change control

----Original Message-----

From: Tyra Colbert [mailto:tyra.colbert@wcom.com]

Sent: Monday, April 10, 2000 7:39 AM

To: sandra k evans; sharon.arnett@openmail.mail.sprint.com; Williamson,

Jill R. NCAM; mark.e.turner@wcom.com

Subject: RE: change control

All,

MCI WorldCom also agrees that a consensus has not been met between the CLEC community and Bell South, and that a 3 month trial period is a must. Without a trial period this would allow BST to close the door on a process that we have noted clear disagreement and have highlighted several gaps within the process. MCI WorldCom is in support of requesting that a trial period be established before the process is considered final.

Tyra

```
> ----Original Message----
> From: sandra k evans imailto:sandra.k.evans@mail.sprint.com1
> Sent: Friday, April 07, 2000 4:34 PM
> To: sharon.amett@openmail.mail.sprint.com; jrwilliamson@att.com;
 mark.e.turner@wcom.com; Tyra.Colbert@wcom.com
> Subject: RE: change control
>
> Jill,
> Sprint agrees BellSouth did not receive consensus. I think a 3 month
> trial should show a good indication if the CMP is going to work for the
> CLEC community. Sprint is already experiencing issues with system outage
> notifications and getting questions resolved between the Change
> Management Team and the Account Team.
> Sandy
> 913-433-8499
>
   ----Original Message----
   From:
             [rwilliamson [SMTP: jrwilliamson@att.com]
             Thursday, April 06, 2000 4:23 PM
   Sent:
            mark.e.turner; Arnett, Sharon A.; Evans, Sandra K.;
   To:
           Tyra.Colbert
            irwilliamson
   Cc:
   Subject: change control
   As FYI, attached is KPMG's interim report on the Georgia Third Party
   Testing. Take a look at the Change Control Section highlighted. As
   I'm concerned, we don't have a consensus. Also, I firmly believe,
   based on
   my past and current experience with the process, that we need to have
```

Docket No. 000731-TP JMB-R4 Page 10 of 11



EICCP Steering Committee Meeting Minutes

DATE: March 23, 2000

MEETING: EICCP Steering Committee

PURPOSE: Review Interim Change Control Process

ATTENDEES

Tyra Colbert, MCI	Brian Rutter, KPMG	Valerie Cottingham, BST
Sandy Evans, Sprint	Jill Williamson, AT&T	Edwardine Marrone - BST
Melvin Porter, BST	Tom Montemayer, Mantiss/Access One	Shamne Stapler, ITC-DeltaComm
Bill Shoemaker, BST	Cornelius White, BST	Cheryl Storey, BST
Renard Robinson, BST	Steve Hancock, BST	·

AGENDA

Agenda

This was a follow-up conference call to review BST's input regarding the recommended changes made to the Change Control Process during the CLEC/BST February 29, 2000 conference call,

SUMMARY OF MEETING

TOPIC	DISCUSSION
Opening	The BCCM opened the meeting and covered the items we were to accomplish on this conference call.
	Review the Interim Change Control Process document.
	Review outstanding action items from 2/29/00 conference call.
	• Review new action items.

Docket No. 000731-TP JMB-R5 Page 1 of 6

The CCP documentation (Ver 1.3, March 14, 2000) was updated to incorporate the following Review of Changes to the changes: Addition of Type 6 Change Request, CLEC Impacting Defect CCP 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 Added web site address for the Change Control Process Added notification regarding the Retirement and Introduction of new interfaces Added new status codes for Defect Change Requests: "V" for Validated Defect, "W" for Workaround Developed, "DC" for Defect Cancelled", "S" for Defect Scheduled for Release and "I" Defect Implemented Added new status codes for Types 2-5 Change Requests: "S" for Scheduled for a Release and "I" for Implemented Change Request 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. Each section of the Interim Change Control Process document (Version 1.3, March 14, 2000) was **Process**

reviewed. Changes agreed upon are reflected in the Action Items.

Docket No. 000731-TP JMB-R5 Page 2 of 6

Change/Review

CLEC Concerns

The following are concerns expressed by the CLECs regarding the Interim Change Control Process:

- Introduction of new interfaces and retirement of existing interfaces. All new interfaces must be introduced through the CCP (not just announced) and that the retirement of an existing interface should be facilitated through the CCP.
- Issues around or changes to testing of the interfaces and processes should be managed through the CCP.
- Any issues or questions surrounding the interfaces, documentation of business processes should also be managed through the CCP.
- Notifications and correspondence from BellSouth should be distributed to the industry via BellSouth's web site and email.
- Need a process for reporting requests for expedited features.
- The intervals for resolution of a defect are too long.
- Need to further define defect (system vs. design, lack of business rules)
- Software release and documentation notifications of 30 days are not sufficient time for CLECs to build their interfaces.

CLEC Training of new CCP

CLEC training will be developed to educate CLECs of the improvements to the process. Training documentation will be posted to the web. BST asked for volunteers from the CLEC community to assist with the development of training. No volunteers were provided.

Review of Outstanding Action Items

1. Backup support for CSMs.

Status: For after hours support the appropriate Customer Service Center should be contacted and escalation procedures utilized if necessary.

2. Regulatory statements/changes - will BST notify CLEC community if they are not going to comply or if they plan to apply for extension, etc.

Status: BellSouth will comply with Regulatory statements/changes. If dates of responding are different a CLEC Notification Letter will be posted to the BellSouth web site.

3. Test environment for CLECs.

Status: There is a pending change request under review for an EDI Test Environment,

4. Web posting of release status and release notification information.

Status: Release status and release notification information will be posted to the web site when the new CCP is fully implemented.

5. Retirement of existing interfaces.

Status: Note was added to Version 1.3, March 14, 2000 CCP document indicating as new interfaces are introduced or retired, BellSouth will post a CLEC Notification Letter to the web 60-90 days prior to the introduction or retirement of the interface. Refer to "CLEC Concerns" – this is an outstanding issue.

6. Status of pending change requests.

Status: Our monthly status meeting on March 29, 2000 will provide status of all pending requests.

7. Copy of notification template.

Status: The Type 1 System Outage notification template was reviewed during this meeting.

8. BST is currently looking at incorporating the initial notification for Type 1 System Outages via email to all impacted CLECs.

Status: No status change.

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Review of New Action Items

- BellSouth will consider improvement ideas listed in the "CLEC Concerns" section of these
 minutes.
- 2. BST Electronic Communications Support (ECS) will entertain the suggestion of providing resolution information to the Type 1 System Outage Notification.
- 3. The Change Control Team will make the following changes to the Interim Change Control Process document (Version 1.3, March 14, 2000):
- Add "billing" to Process and Documentation bullets under types of changes that will be managed by this process (Introduction Section)
- Further define "Testing Support" and "Issue Resolution/Questions" under types of changes that Change Control Process does not include (Introduction Section)
- Define a process for handling defects that are re-classified as features (design defects and documentation issues).
- Change Step 3 cycle time (Types 2-5) from 15 to 20 Bus Days.
- Add to Step 10 (Types 2-5) verbiage regarding BellSouth Business Requirements will be presented to CLECs. If needed, BellSouth will incorporate changes and re-baseline.
- Add verbiage to reflect that notification will be posted to the web if it is determined that a
 defect affects more than one CLEC (Section 5.0 Defect Notification Process opening
 paragraph).
- Reword "NOTE" in Section 6.0 Change Review to reflect that status meetings will occur monthly. Prioritization meetings will include monthly status agenda.
- Terms & Definitions include verbiage to the definition for Type 1 System Outage to match Type 1 Definition in Section 3.0.

Closure

The goals of implementing the new Change Control Process are:

- "Work" process as defined
- Review performance of defined process
- Take "improvement ideas" into consideration
- Move forward with implementing new Change Control Process 4/17/00

A follow up call will be scheduled to review status of outstanding issues. Meeting details to follow.

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Change Control Process Meeting Minutes

DATE:

April 17, 2000

MEETING:

CCP Interim Document Review Meeting

PURPOSE:

Review Status of CCP Interim Document changes

ATTENDEES

Tyra Colbert, MCI

Mary Conquest, ITC-

Valerie Cottingham, BST

Deltacom

Sandy Evans, Sprint

Jill Williamson, AT&T Cheryl Storey, BST Edwardine Marrone - BST

Steve Hancock, BST

Bill Shoemaker, BST

AGENDA

Agenda

Review changes to the Interim CCP Document since last meeting.

SUMMARY OF MEETING

Topic	THE STATE OF THE S
Opening	The BCCM opened the meeting and covered the items we were to accomplish on this conference call.
	Review changes to the Interim CCP Document, including the Testing portion.

Cheryl Storey – BST discussed the recent changes that have been made to the Interim Change Control Document (Ver. 1.4, April 14, 2000). These included the addition of the Testing Environment portion and clarification of the Dispute Process.

- 1. Discussed the verbiage surrounding the addition of "billing" issues to the document in the introduction section. Clarification was offered and discussion was held that Change Control would not handle billing changes as they affect the electronic interfaces. BST will go back internally and clarify the scope of what "billing" will include.
- 2. Change control will not be including testing support.
- 3. Clarified that the issue resolution/questions are not included in Change Control.
- 4. Discussed about Type 1 system outages and that Email notification will now be sent with the web posting. Also clarified the email notification reference throughout the document.
- 5. Discussed about Type 6 defect notification and that Email notification will now be sent with the web posting. Also clarified the email notification reference throughout the document as it relates to Type 6.

Discussed the Introduction and Retirement of Interfaces section and the posting guidelines. 7. Discussed about the addition of the Dispute Resolution Process to the document. 8. Discussed the addition of the Informational page regarding the Testing Environment and explained that testing would not be included in change control but should be coordinated through the Account Teams using the current process. 9. BST recommends to the CLEC community that if a trial is agreed upon for 3 months using this process and CLEC issues are addressed, a "final" baselined document would be implemented at the end of the 3 month period. MCI and ITC/Deltacom verbally agreed to this. 计学学的概律系统 1. Tyra Colbert (MCI) asked if Email notification on System 1 outages would include the resolution. BST explained that currently the date, type of outage, brief description of outage Issues raised and resolution date will be included. by the CLECs ACTION ITEM: BST - Susan Hart will provide the suggested format that the ECS group will publish. 2. Jill Williamson (AT&T) is concerned that workarounds are not always working and there needs to be a process or mechanism in place to identify these situations and allow for more expedient resolution. 3. Jill Williamson (AT&T) wants clarification on when a defect becomes a "feature" change and gets re-classified as a pending request. 4. AT&T, Sprint, and MCI agreed that depending on the situation, the CLECs may not be willing to participate in another "dispute team" before filing a formal complaint with the commissions on items that have been escalated to Level 3. 5. CLECs would prefer that the testing environment go through Change Control. 6. Tyra Colbert (MCI) recommends that additional terms be added to the term definitions. (e.g., Account Manager, ECS, etc.) 7. CLECs recommend to BST that a 3 month trial be implemented using the Interim Change Control process to determine if process is working as outlined before committing the document as "Final".

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November 13, 2000 Release 9.0 User Requirements MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Release 9.0 User Requirements	Cheryl Storey - Change Control Team	11-14-00
	· .	

Participants/Attendees

PARTICIPANT	COMPANY
Sheriann Lively	Trivergent
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Jill Williamson	AT&T
Donna Cain	AT&T
Anthony Zerillo	Birch Telcom
Woody Roe	Albion Connect
Tami Swanson	Anderson Consulting
Kim Gillette	Quintessent
Gloria Melvin	Trivergent

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Meeting Information History

DATE	START TIME	END TIME
11/13/00	2:00 PM EST	3:00 PM EST

MEETING PURPOSE

- Review User Requirements for Release 9.0.
- Discuss reason for removing three (3) targeted features from Release 9.0 scope.

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November 13, 2000 Release 9.0 User Requirements MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. Removal of Targeted Features from Release 9.0 Scope	The following features that were targeted for Release 9.0 will not be included in the scope:
	CR0003 - RPON Electronic Reject & Flow-Through
	EDI1215990001/CR0133 - TN vs RSAG Validation/Migration of UNE-P Notifications
	EDI0812990003 - 411 Drops - Electronic Solution
	Due to the system capacity of Release 9.0, with Number Pooling being a sizable effort, the above 3 (three) targeted features have been removed from the Release 9.0 scope and are being considered for Release 10.0.
	BellSouth is in the process of finalizing Release 10.0 scope. The prioritization ranking from both the 6/28/00 and 9/27/00 meetings are being considered for Release 10.0. It's probable that all items previously targeted will not be included in Release 10.0.
	Release 11.0 has not been scheduled yet.
2. Review of UNE to UNE Migrations User Requirements (CR0030)	Jane Scott led the review of the UNE to UNE Migrations User Requirements (CR0030). The scope of this feature is to provide the functionality to electronically support UNE-to-UNE migration service requests for REQTYP M: ACT of V for Port/Loop Combo to REQTYP A (Loop).
	Jill (AT&T) questioned if this feature supported REQTYP M to B. The response provided was that REQTYP M to B was not included in these User Requirements. If this functionality is needed, a Change Request would need to be submitted.
	Jill (AT&T) questioned if orders could be related. The response provided is that there is no change in submitting RPONs to relate LSRs.
	Jill (AT&T) questioned if there were any restrictions with this feature. Jane advised there are no restrictions. If you can perform a function today, you will be able to perform the same function when this feature is implemented.
	This feature accommodates conversion from CLEC to same CLEC (must own the account).
3. Wrap up/Adjourn	Release 9.0 scope includes:
	CR0169 - Number Pooling Mandate
	CR0030 – UNE to UNE Migrations
	The scheduled implementation date is 01/06/01.



November 13, 2000 Release 9.0 User Requirements MEETING MINUTES

Docket No. 000731-TP JMB-R6 Page 3 of 19 ----Original Message----

From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com] Sent: Wednesday, November 08, 2000 5:19 PM

To:

Subject: ID: Update to Rel 9.0 Targeted CRs

Distributed	Message	

Message sent by: Change Control /m6, mail6a

To unsubscribe from CCP, send a message to List Manager /ml, mailla with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

	DRAF	T		
Internal Reference #	(1)	Date Change Rec	quest Submitted	3/2/00 (2)
TYPE 5 (CLEC)	PE 4 (BST) TYPE 3	(INDUSTRY)	TYPE 2 (REG	ULATORY) (3)
☑ DEFECT (3A) Company NameAT&T				(4)
CCMJill Williamson	(5)	Phone404-810-	8562	(6)
CCM Email Address _jrwilliar	mson@att.com(7) F	ax404-810-856	2	(8)
Alternate CCM	(9)	Alt Phone #		(10)
Originator's Name _Jill William	nson(11)	Phone_404-810-8	562	(12)
Title of ChangeRPON Bus	siness Rules and Error Me	essages		(13)
Category Add New Fund	ctionali ty 🔀 Change E	Existing (14) Desi	ired Due Date	<u>3/10/00 (</u> 15)
Originating CCM assessment	of impact Major [Minor No	one expected (1	6)
Originating CCM assessment	of priority 🔀 Urgent [☐ High M	edium 🔲 Low	v (17)
Interfaces Impacted (18)				
Pre-Ordering	⊠ Ordering	Maintenanc	e	Manual
☐ LENS ☐ TAG	⊠ EDI □ LENS	☐ TAFI	cal	
□ csoтs	☐ TAG			
Type Of Change - Check o	ne or more, as applicable	(19)		
Software	☐ Hardware	` · · · · · · · · · · · · · · · · · · ·	☐ Industry Stand	dards
Product & Services	New or Revised E	dits	Process	
□ Documentation	Regulatory		Other	
Description of requested changsheets, if necessary.) (20) There are currently no docume sending the orders such that the second PON and so forth. At corder. Also, our understanding should be rejected. This does others get FOC'd. BellSouth necessary was rejected because the environment) BellSouth needs. Known dependencies (21)	ented business rules for plane second PON is related one time, BellSouth told us is that if BellSouth rejects not happen. In most case needs to clearly define its eness rules. Also, BellSouth e RPON'd order was rejected.	acing orders that a to the first PON, the sthat we should re- s one of the relate s when one of the expectations for re- h does not have a cted. (We've only	are related. AT& ne third PON is relate all of the or d orders, all of the related orders is lated orders and n electronic rejectseen this in the	elated to the ders to the first ne related orders is rejected, the lifix its systems of that states the
			Dock	et No. 000731-TI
Additional Information Ye	es 🔲 No (22)		,	JMB-R6 Page 5 of 19
Attachment A-4A			-	1 age 2 01 19

ist all business specifications and/or requirements of applicable)	ocuments inclu	ied (or internet	I Standards location,
his Section to be completed by BCCM only.			
Change Request Log #CR0003	23)	Clarification	☐ Yes No (24)
Clarification Request Sent/_/_(25)	Clarification	on Response D	ue/ (26)
Status RC(27)			
Change Request Review Date 06/28/00_(28)	Target Implen	nentation Date	(29)
ast Modified ByBCCM	(30)	Date Modified	_11/6/00 (31)
Review Results (32)3-17-00 There is not a buspecause one other or several others that are related documentation staff to incorporate the handling of RI	are rejected. The	his issue has b	
6-29-00 Business rules for RPONs are targeted to be Business Rules for Local Ordering (BBR-LO) mid-Ju		next update of	the BellSouth
7-25-00 Target date for posting RPON business rule BBR-LO) guide has changed to August 25, 2000. T sized for a future release.			
B/16/00 Advance copy of RPON business rules pro	ovided to CLEC	community.	
3/31/00 - RPON business rules posted on Web site.			
9/14/00 See Related CR0137 and CR0160.			
AT&T is requesting that BellSouth modify its systems systems without manual intervention. AT&T would like types: All RPON'd orders.			
9/22/00 – Targeted for Release 9.0 scheduled for 01	/06/01.		
11/6/00 – RPON flow-through and electronic reject w ssue to be addressed during the 11/13/00 Release 9			•
Canceled Change Request 🔲 Duplicate 📋 Train	ning 🔲 Clarifi	cation Not Rec	eived (33)
Cancellation Acknowledgment CLEC E	BST	Date/	/ (34)
Request Appeal Yes No (35)			
Appeal Considerations (36)			
Agreed Release Date//(37)		0.00	
ARTOON MOISSE DOTA (/ 127)		/IVC #	(38)

DDTS#	(39)

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BELLSOUTH

Change Request Form

Internal Reference # (1) Date Change Request	Submitted 12/15/99 (2)
X CLEC BST (3) Company Name AT&T	(4)
CCM Jill Williamson (5) Phone	404-810-8562 (6)
CCM Email Address <u>jrwilliamson@att.com</u> (7) Fax	404-810-8605 (8)
Alternate CCM (9) Alternate	``
Originator's Name Jill Williamson (11) Phone	404-810-8562 (12)
Title of Change Validation on TN vs. Address	(13)
Category: Add New Functionality X Change Existing (14) Des	ired Due Date 2/1/00 (15)
Originating CCM assessment of impact X Major Minor	None expected (16)
Originating CCM assessment of priority X Urgent High	Medium Low (17)
Interfaces impacted (18)	
Pre-Ordering X Ordering Maintenance	
LENS X* EDI TAFI	
LPOG LENS EC-TAL	ocal
EDI-PC * OSS'99 and TCIF7	
Type Of Change - Check one or more, as applicable (19)	
Software Hardware Indu	istry Standards
Product & Services X New or Revised Edits Product	cess
Documentation Regulatory Other	er e
Description of requested change including purpose and benefit received from	this change. (Use additional
sheets, if necessary.) (20)	
It appears that BellSouth currently conducts full edits on both the telephone nu	
orders, regardless of the activity type. Because the edit requires that every as	
correct (St. vs Street), a high number of "RSAG invalid" rejects are unncessar	
that this level of validation is probably necessary on an order for new service,	
when a migration of or change to existing service is being ordered. In the pas	
on these order types, validating the TN and street number against its database	
dropped significantly. AT&T requests that BellSouth relax its edits on migratic	The state of the s
and use TN and street number information only for validation purposes. While	this request is more
critical for non-LNP orders, it also applies to LNP orders.	
Known dependencies (21)	
	_
Additional Information Yes No (22)	Docket No. 000731-TP
	JMB-R6 Page 8 of 19
	Lage o of 13

List all business specifications and/or requirements documents included (or Internit applicable)	et / Standards location,
	RF-1870

BELLSOUTH

Change Request Form

	ction to be complete	d by BCCM only.					
Change	Request Log #	EDI121599001		(23)	Clarification	XYes	lo (24)
Clarifica	ation Request Sent	12/16/99	(25)	Clarific	ation Response	Due 12/23/99	(26)
Status	RC	(27)					
Enhanc	ement Review Date	06/28/00	(28)	Target Imp	lementation Dat	e	(29)
_ast Mo	odified By BCC	СМ		(30)	Date Modifie	d <u>11/6/00</u>	(31)
and den changes For LNF end use Targete	Edits have been renies. BST is current is that may need to led, the edits cannot be address is in the standard of the for Release 9.0 standard CR0133 - Migration	tly reviewing the bit be made to support be relaxed because same TMRC with the cheduled for 01/06	usiness runt convers the end the serving \$\int 6/01.	les to deter ions and mi user inform g wire cente	mine electronic grations (ACTs ation is used to r for that teleph	programming V, W, P and Q). ensure that the one number.	s
	TN vs RSAG Valid					e. This issue wil	<u></u>
Cancell	ed Change Requestation Acknowledgment Tyes	ent CLEC		Training		ntion Not Receive	ed (33)
Appeal	Consideration (36)					Docket No	ስ በበበማ
						JM	IB-R6 9 of 1
Agreed	Release Date	(37)					
	lai	ntly Developed by	the FI Ch	ange Contr	ol Sub-team co	mprised	

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(D) BELLSOUTH

Change Request Form

Internal Reference #	(1Date	Change Req	uest Submitte	8/12/99	(2)
X CLEC BST (3) Company Name		Pai	104.040	0500	(4)
CCM Jill Williamson	(5)	Pho			(6)
CCM Email Address jrwilliamson@att.com		(7) Fax	404-810-	8603	(8) (10)
Alternate CCM		(9) Altei (11) Pho	rnate Phon e ne 404-810-	8562	(12)
Originator's Name Jill Williamson Title of Change 411 Drop-out		(11) PIIQ	404-810-	0302	(12)
			Desired Due	10/1/00	•
Category: X Add New Functionality	L L			-	(15)
Originating CCM assessment of impact	Ш	X Minor		pecte(16)	
Originating CCM assessment of priority	X	High	Medium	Low (17)	
Interfaces Impacted (18)]
Pre-Ordering X Orde	ering	Maintena	ance		
	EDI	TAF	7		
	LENS	FC.	TA Local		
<u> </u>			TA LOOD!		
	EDI-PC				
					Ĺ
Type Of Change - Check one or more, as applicable	e (19)]
Software	Hardware		Industry Star	ndards	
Product & Services	ı New or Re	evised Edi X	Process		
	<u>.</u>	<u></u>			
Documentation	Regulator	′ <u> </u>	Other		
					_
Description of requested change including purpose a	and benefit	received from	this change.	(Use addition	nal
sheets if necessary) (20)					
In the current environment, when a customer's listing	g "drops ou	t" of 411/DA,	BellSouth requ	ures that	-
CLEC's fax a new LSR to BellSouth to correct the dr	op out rega	ardless of whe	the CLEC a	now I SP	_
by BellSouth or the CLEC. AT&T agrees that when the should be sent. However, when the fall out is caused	the grop of	nt is caused by	should not ha	ve to send a	_
LSR. AT&T requests that BellSouth adopt its 411 dr	on out for	o as an interin	solution whe	n the drop of	 it
is caused by BellSouth and work jointly to develop a	n accentat	de process for	future use an	d propose	
our jointly developed form/process to OBF. Because	AT&T ha	e nothing to "c	orrect" on tha	t customer's	-
service, it's systems cannot (and should not) genera	te a new l	SR with no ch	anges	r customer s	-
	ite a new L	SK With no ch	anges.		-
Known dependencies (21)					
					_
A LINE LLA COLOR DE LA COLOR D					_
Additional Information XYes	No	included (er l	nternet / Stan	darde locatio	n
List all business specifications and/or requirements	documents	included (01 1	incinet / Otali	uaius iocalloi	11,
if applicable)			D	ocket No. 0	00 731 -T
				ЈМВ-	
	-			Page 12	of 19

RF-1870 (5/98)

BELLSOUTH

Change Request Form

This Section to be completed by BCCM only.	
Change Request Log # EDI0812990003	_(23) Clarification Yes X No (24)
Clarification Request Sent	Clarification Response Due (26)
Status RC (27)	
Enhancement Review Date 9/28/99 (1st) (2Ta 6/28/00 (2nd)	arget Implementation Date(29)
Last Modified By BCCM	(30) Date Modified(31)
Review Results (32) Note: BST agrees that when a listing falls out of 411/DA due to be submitted by the CLEC. BST will be glad to review the finterim solution to the problem and advise if we agree to use it	orm that ATT proposes to be used as an
09/18/00 - The process for handling 411 drops will be docume community. If a listing drops out of 411/DA, the CLEC should The LCSC retrieves the LSR to investigate cause of error. If a corrected immediately, no additional paperwork is required. If resubmit LSR. Change Control is in the process of investigati use to report 411 drops in batch, if they do not wish to call the 09/22/00 - A form for CLECs to use to report 411 drops in batch Monthly Status meeting. BST is pursuing the possibility of impin Release 9.0.	call the LCSC to report the drop. determined to be a BST error, it is CLEC error, CLEC will need to ng a standard process for CLECs to LCSC. ch will be presented at the 10/25/00
10/25/00 - Documented process for reporting 411 drops and a batch was presented and discussed at the 10/25/00 Monthly 5 form will be discussed at the 11/15/00 Monthly Status Meeting implemented.	Status Meeting. Updates to the
11/6/00 - The electronic solution for reporting 411 drops will no scope. This issue to be addressed at the 11/15/00 Monthly St	1300 KCL 110, 000751 - 2
Canceled Change Request Duplicate Tr	aining Clarification Not Recei (33)
Cancellation Acknowledgment CLEC	BST Date (34)
Request Appeal Yes No (35) Jointly Developed by the El Change C	Control Sub-team comprised 2 of 3
of BellSouth and CLEC R	•

Appeal Consideration (36)		
Agreed Release Date	(37)	

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Bradbury, J M (Jay) - LGA

From:

jrwilliamson@att.com

Sent:

Tuesday, November 28, 2000 10:05 AM

To:

bradbury@att.com; sharonnorris@att.com; eppsteiner@att.com; mrule@att.com;

gpterry@att.com; dreinig@att.com; bkgrant@att.com; bobik@att.com

Subject: FW: 11/13/00 Rel 9.0 User Requirements Meeting Minutes

Importance:

High

----Original Message----From: Williamson, Jill R, NCAM Sent: Tuesday, November 28, 2000 10:04 AM To: 'Change.Control@bridge.bellsouth.com'; Annette.Cook@espire.net; apatel3@telcordia.com; BellSouth@quintessent.net; best2@surfsouth.com; brutter@kpmg.com; bszafran@covad.com; c and m@bellsouth.net; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cecilia.ortiz@adelphiacom.com; cflanigan@uslec.com; Chapmanwe@cepb.com; charrison@mpowercom.com; cheryl@eatel.com; chrisq@pvtel.net; christine.shelton@cc.gte.com; colleen.e.sponseller@wcom.com; Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com; daddymax@netbci.com; dana.braun@adelphiacom.com; Debra.Pasquale@btitele.com; DElliott@connectsouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com; donnam@networktelephone.net; donnas@intetech.com; dpetry@ix.netcom.com; drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.gte.com; epadfield@nextlink.com; ESingleton@eztalktelephone.com; evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net; generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com; jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc; JDuffey@PSC.STATE.FL.US; jeffrey@cellularsouth.com; JG68370ctmail.snet.com; jhoze0kmctelecom.com; jmclau0kmctelecom.com; JMMaxwell@Intermedia.com; jnovo@mpowercom.com; Wilson Jr, Jack T (Tom), BGM; julie.jacobs@adelphiacom.com; Katherine.Hudler@espire.net; kcooper@eftia.com; kelley.dunne@onepointcom.com; khudson@nextlink.com; Kimberly.O.Williams@MCI.com; kmarshall@telstar.org; kmiller@northpointcom.com; kschwart@covad.com; lhall@floridadigital.net; lisa@annox.com; Lminasola@MediaOne.com; Lorraine.Watson@wcom.com; mark@annox.com; marybethkeane@kpmg.com; matt@albionconnect.com; mconquest@itcdeltacom.com; mer@networkwcs.com; microsun@bellsouth.net; mmclaughlin@dset.com; mt7210@momail.sbc.com; ngiugno@kpmg.com; Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@MediaOne.com; Pkinghorn@eztalktelephone.com; prehm@nightfire.com; prichardson@Trivergent.com; rbennett@floridadigital.net; rbuffa@interloop.net; rhonda.calvert@adelphiacom.com; robert@alternativephone.com; rszczepanski@kpmq.com; sandra.k.evans@mail.sprint.com; Sandrajf@intetech.com; sbowling@caprock.com; shane@eatel.com; sharon.arnett@mail.sprint.com; sharon.russo@btitele.com; sjenning@nowcommunications.com; smason@interloop.net; smoore@Trivergent.com; smurray@rhythms.net; snole@kpmg.com; srober@kmctelecom.com; SStapler@itcdeltacom.com; steve.taff@allegiancetelecom.com; stuartw@networkonecom.com; talleylinda@mindspring.com; Tanya.Finney@espire.net; TAYLORJG@LCI.COM; timk@networktelephone.net; TLA@MAGICNET.NET; tmontemayer@MANTISS.com; Todd@CSII.net; usfloridaoss@kpmg.com; Williamsal@cepb.com; wmknapek@Intermedia.com; wolfsbrq@cris.com; woody@albionconnect.com; Yvette.Brown@espire.net; Tyra.Hush@wcom.com; trsmith@Trivergent.com; chaynes@Trivergent.com; ssmith@dset.com; sangelo@bellsouth.net; sbrown@covad.com; gulfcoast@dotstar.net; Mark.Mecca@dsl.net; Connie@albionconnect.com; ASamson@birch.com; heidi.a.crow@mail.sprint.com; rbreckin@telcordia.com; msykes@telcordia.com; billg@telcordia.com; svc-gate@telcordia.com;

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karen.grim@mail.sprint.com; mike.norris@mindspring.com; csti@bellsouth.net; mdominick@Trivergent.com; dgraham@MANTISS.com; KKester@STIS.com; Jim.Meyers@wcom.com; Hwhittington@mpowercom.com; Taldinger@mpowercom.com; Rdupraw@mpowercom.com; Jim.Meyers@wcom.com; JOliver@birch.com; reym@networktelephone.net; LHinton@PrismCSI.net; dmcmanus@Trivergent.com; bmurdo@kmctelecom.com; david.burley@wcom.com; SLively@Trivergent.com; TThompson2@broadband.att.com; blsinterfacecontrol@kpmg.com; Kathryn.Phipps@btitele.com; ronald.1.thompson@xo.com; MPatyk@connectsouth.com; schula.hobbs@dsl.net; mark@albionconnect.com; AZerillo@birch.com; EGunn@birch.com; clhawk@kmctelecom.com; tami.m.swenson@ac.com; jim.lee@dsl.net; TJStokes@Trivergent.com; Faye.Restaino@dsl.net; Elliot.Wrann@dsl.net; changecontrol.bellsouth@onepointcom.com; carl.taylor@lecstar.com; Glenn.Sonnier@usunwired.com; arobison@kpmg.com; default.user@bellsouth.com; KUchida@northpoint.net; ESaeed@northpoint.net; PPinick@birch.com; lynn@mfn.net; ruth@mfn.net; mcbrunnhilde@juno.com; lavernek@arrowcom.com; Micki.Jones@wcom.com; jfuller@fairpoint.com; EFarnell@broadband.att.com; Ellen.Neis@mail.sprint.com; Ronald.Klamer@wcom.com; conniec@arrowcom.com; CoDavis@covad.com; timw@networkonecom.com; sheryl scobel@stratosoilandgas.com; Nancy.Watt@RHTelCo.com; wendy.hernandez@RHTelCo.com; swargo@rhythms.net; Alan.Flanigan@twtelecom.com Subject: RE: 11/13/00 Rel 9.0 User Requirements Meeting Minutes Importance: High

Change Control Team,

This message is to follow-up on the concerns I expressed in our November 13 call to review UNE to UNE Migration requirements. As I stated on the call, the requirements developed by BellSouth do not meet the needs of AT&T. BellSouth's requirements only allow a CLEC to migrate from a port/loop combination (REQTYP M) to a stand alone loop (REQTYP A). This scenario will be a very rare occurrence when converting a customer from UNE-P to UNE-L. In most, if not all, instances, the customer will want to keep his existing telephone number. Because BellSouth failed to include requirements for converting from a port/loop combination (REQTYP M) to a loop with number portability (REQTYP B), CLECs will be forced to send multiple orders to accomplish a migration that could be done with one order. Today's environment allows us to migrate a customer from BellSouth retail to a loop with number portability, therefore, the same process should be available to migrate from UNE-P to loop with number portability.

When BellSouth presented its requirements for UNE to UNE Migrations, it presented the requirements as final with no opportunity for change by the CLECs. This is another instance of BellSouth not providing CLECs the opportunity to provide input during the development phase. The result is that BellSouth will be delivering a product that does not meet the needs of the CLECs, adds expense to CLECs cost of doing business (charges per order), and will cause re-work in the future to change what was implemented.

As part of our CCP Improvement initiative, we MUST create a process with intervals that allow for better communication between CLECs and BellSouth SMEs. Otherwise, both BellSouth and the CLECs will continue to expend resources unnecessarily with little results to show for it.

Sincerely,

Jill Williamson AT&T Local Services and Access Management

----Original Message----

From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com] Sent: Friday, November 17, 2000 8:51 AM

To: Annette.Cook@espire.net; apatel3@telcordia.com;

JMB-R6 Page 16 of 19

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drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.gte.com;
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evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net;
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Todd@CSII.net; usfloridaoss@kpmg.com; Williamsal@cepb.com;
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SLively@Trivergent.com; TThompson2@broadband.att.com;
blsinterfacecontrol@kpmg.com; Kathryn.Phipps@btitele.com;
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clhawk@kmctelecom.com; tami.m.swenson@ac.com; jim.lee@dsl.net;
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changecontrol.bellsouth@onepointcom.com; carl.taylor@lecstar.com;
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default.user@bellsouth.com; KUchida@northpoint.net;
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mcbrunnhilde@juno.com; lavernek@arrowcom.com; Micki.Jones@wcom.com;
```

Docket No. 000731-TP JMB-R6 Page 17 of 19 jfuller@fairpoint.com; EFarnell@broadband.att.com; Ellen.Neis@mail.sprint.com; Ronald.Klamer@wcom.com; conniec@arrowcom.com; CoDavis@covad.com; timw@networkonecom.com; sheryl_scobel@stratosoilandgas.com; Nancy.Watt@RHTelCo.com; wendy.hernandez@RHTelCo.com; swargo@rhythms.net; Alan.Flanigan@twtelecom.com
Subject: ID: 11/13/00 Rel 9.0 User Requirements Meeting Minutes

Message sent by: Change Control /m6, mail6a

To unsubscribe from CCP, send a message to List Manager /ml,mailla with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

Docket No. 000731-TP JMB-R6 Page 18 of 19 December 15, 2000

Jill,

This message is to acknowledge receipt of your 11-28-00 e-mail expressing concerns with the UNE to UNE Migration user requirements. As part of our CCP Process Improvement meetings we have committed to provide the user requirements earlier in the process, which will allow for better communication between CLECs and BellSouth. As we discussed at our 12-7-00 meeting, BellSouth proposed that draft user requirements will be provided 90 calendar days in advance of the release implementation date and that final user requirements will be provided 45 calendar days in advance of the release implementation date. The CLECs requested that these intervals be changed to state "in advance of the CLEC testing with BST date" in lieu of release implementation date. We are currently addressing this request and will provide an update at our January 10, 2001 CCP Process Improvements Meeting.

BellSouth is committed to ensuring that we have adequate communication with the CLECs to support their needs.

Please let us know if you have questions.

Thanks,

Change Control Team

----Original Message----

From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com] Sent: Monday, November 13, 2000 2:48 PM

To:

Subject: ID: New Change Requests

	Distributed	Message	
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Message sent by: Change Control /m6, mail6a

To unsubscribe from CCP, send a message to List Manager /ml,mailla with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

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Change Request Form

Internal Reference #	(1)	Date Change Request Submitted _	1113/00(2)
TYPE 5 (CLEC) X TYP	PE 4 (BST) TYPE 3	(INDUSTRY) TYPE 2 (REGU	LATORY) (3)
TYPE 6 (DEFECT) OC	:N(3A)		
Company NameBellSouth			(4)
CCMBrenda Files	(5) Phone	205-321-2105	(6)
CCM Email Address Change.	Control@bridge.bellsout	h.com_(7) Fax205-321-5160	(8)
Alternate CCM_	(9)	Alt Phone #	(10)
Originator's Name	(11) Pho	one	(12)
Title of Change NPORD Da	ata for FOC (Issue 7)	(13)	
Category	ionality 🛛 Change	Existing (14) Desired Due Date 11/3	30/00_(15)
Originating CCM assessment of	of impact Major	Minor ☐ None expected (16)	
Originating CCM assessment of	of priority Urgent	⊠ High ☐ Medium ☐ Low	(17)
Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☑ LNF ☐ LENS ☐ TAG	Maintenance TAFI EC-TA Local	Manual
Type Of Change - Check on	e or more, as applicable	(10)	
	Hardware	Industry Standards De	ofoot
Product & Services	New or Revised Edits	Process	sieci
	Regulatory	☑ Other	İ
Description of requested change sheets, if necessary.) (20)	e including purpose and	benefit received from this change. (I OC instead of the C Trigger order. The NPORD field.	
Additional Information Yes List all business specifications if applicable)	and/or requirements do	cuments included (or Internet / Stand	lards location,

BELLSOUTH

Change Request Form

(23) Clarification T Yes No (24)
Clarification Response Due/_/_(26)
Target Implementation Date 11/00 (29)
(30) Date Modified/(31)
ing Clarification Not Received (33)
ST Date/(34)
CMVC #(38) DDTS#(39)

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Change Request Form

This section to be completed by BellSouth - Internal Validation of Defect Change Request

Defect Validation Results: (40)

Clarification Ne	eded	☐ Ye	es	⊠ No			
☐ Defect	☐ Feature	☐ Du	plicate	☐ Tra	ining Issue	Cancel	
Defect/Feature	Impacts Other 0	CLECs?	☐ Yes	☐ No			
Interfaces Impa	icted by defect/fo	eature:	☐ EDI		TAG	LNP	LENS
			TCI	F 7	TCIF 9		
Target Impleme	entation Date:						

Docket No. 000731-TP JMB-R7 Page 4 of 13

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Change Request Form

Internal Reference #(1) Date Change Request Submitted _11/13/00(2)
☐ TYPE 5 (CLEC) ☑ TYPE 4 (BST) ☐ TYPE 3 (INDUSTRY) ☐ TYPE 2 (REGULATORY) (3)
TYPE 6 (DEFECT) OCN(3A)
Company NameBellSouth(4)
CCMBrenda Files(5) Phone205-321-2105(6)
CCM Email Address Change.Control@bridge.bellsouth.com_(7) Fax205-321-5160(8)
Alternate CCM(9) Alt Phone #(10)
Originator's Name(11) Phone(12)
Title of Change CSR with 888 USOC (13)
Category Add New Functionality
Originating CCM assessment of impact Major Minor None expected (16)
Originating CCM assessment of priority Urgent High Medium Low (17)
Interfaces Impacted (18)
☐ Pre-Ordering ☐ Ordering ☐ Maintenance ☐ Manual ☐ LENS ☐ EDI ☑ LNP ☐ TAFI ☐ TAG ☐ LENS ☐ EC-TA Local ☐ CSOTS ☐ TAG
Turn Of Charge Charles are an applicable (10)
Type Of Change - Check one or more, as applicable (19) Software
☐ Product & Services ☐ New or Revised Edits ☐ Process ☐ Documentation ☐ Regulatory ☐ Other
Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20) Change to the LNP Gateway to ignore telephone number(s) associated with 888 USOC. The CLEC will no longer be clarified back due to the 888 USOC. This change requires no coding changes for the CLEC community. Known dependencies (21)
Additional Information Yes No (22) List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

BELLSOUTH

Change Request Form

This Section to be completed by BCCM only.							
Change Request Log #CR0217	(23) Clarification Yes No (24)						
Clarification Request Sent//(25)	Clarification Response Due/_ /(26)						
StatusN(27)							
Change Request Review Date/(28)	Target Implementation Date 11/00 (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 B: Request Appeal Yes No (35)	ST Date//(34)						
Appeal Considerations (36)							
Agreed Release Date/(37)	CMVC #(38) DDTS#(39)						

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(a) BELLSOUTH

Change Request Form

This section to be completed by BellSouth - Internal Validation of Defect Change Request

Defect Validation Results: (40)

Clarification Needed		Yes		⊠ No					
Defect	Feature	☐ Du	olicate	☐ Tra	ining Issue	Cancel			
Defect/Feature Impacts Other CLECs?									
Interfaces impacted by defect/feature:		eature:	☐ EDI		☐ TAG	LNP	LENS		
			TCI	F 7	TCIF 9				
Target Impleme	entation Date:								

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Change Request Form

Internal Reference #	(1)	Date Change Requ	est Submitted _	1113/00(2)
☐ TYPE 5 (CLEC) ☐ TYPE 4 (BST) ☐ TYPE 3 (INDUSTRY) ☐ TYPE 2 (REGULATORY) (3)				
TYPE 6 (DEFECT)	OCN(3A)			
Company NameBellSouth				(4)
CCMBrenda Files	(5) Phone	_205-321-2105	(6)
CCM Email Address Change	.Control@bridge.bellsouth	n.com_(7) Fax2	05-321-5160	(8)
Alternate CCM_	(9)	Alt Phone #		(10)
Originator's Name	(11) Pho	ne		(12)
Title of Change EDI Map Ch	ange for Error text (13)			
Category ☐ Add New Functionality ☐ Change Existing (14) Desired Due Date 11/30/00_(15) Originating CCM assessment of impact ☐ Major ☐ Minor ☐ None expected (16) Originating CCM assessment of priority ☐ Urgent ☐ High ☐ Medium ☐ Low (17)				_, ,
Interfaces impacted (18)				
Pre-Ordering LENS TAG CSOTS	☐ Ordering ☐ EDI ☒ LNP ☐ LENS ☐ TAG	Mainten	}	Manual
Type Of Change - Check of	one or more, as applicable	(19)		
Software Product & Services Documentation	☐ Hardware ☐ New or Revised Edits ☐ Regulatory	☐ Industry Stand ☐ Process ☑ Other	dards De	efect
Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)				
LNP is changing to allow 264 characters to be returned on the FOC for error messages that are returned to the CLEC. The CLEC will not see any change in this particular LNP feature until the ENCORE systems are able to work their feature to actually change the EDI map to accommodate the 264 characters.				
Known dependencies (21)				
Additional Information Yes No (22) List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)				

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Change Request Form

This Section to be completed by BCCM only.	
Change Request Log #CR0218	(23) Clarification Yes No (24)
Clarification Request Sent/_/_(25)	Clarification Response Due//(26)
StatusN(27)	
Change Request Review Date//_(28)	Target Implementation Date 11/00 (29)
Last Modified By	(30) Date Modified/(31)
Change Review Meeting Results (32)	
Canceled Change Request Duplicate Train	ning Clarification Not Received (33)
Cancellation Acknowledgment CLEC B	3ST Date/(34)
Appeal Considerations (36)	
Agreed Release Date//(37)	CMVC #(38) DDTS#(39)

Docket No. 000731-TP JMB-R7 Page 9 of 13



Change Request Form

This section to be completed by BellSouth - Internal Validation of Defect Change Request

Defect Validation Results: (40)

Clarification Nee	eded	☐ Yes	⊠ No			
Defect	Feature	☐ Duplicat	e 🔲 Tra	aining Issue	Cancel	
Defect/Feature I	mpacts Other 0	CLECs?	′es ☐ No			
Interfaces Impac	ted by defect/fe	<u> </u>	EDI CIF 7	☐ TAG	LNP	LENS
Target Implemer	ntation Date:					

Docket No. 000731-TP JMB-R7 Page 10 of 13

BELLSOUTH

Change Request Form

Internal Reference #(1) Date Change Request Submitted _11/13/00(2)				
☐ TYPE 5 (CLEC) ☐ TYPE 4 (BST) ☐ TYPE 3 (INDUSTRY) ☐ TYPE 2 (REGULATORY) (3)				
TYPE 6 (DEFECT) OCN(3A)				
Company NameBellSouth(4)				
CCMBrenda Files(5) Phone205-321-2105(6)				
CCM Email Address Change.Control@bridge.bellsouth.com_(7) Fax205-321-5160(8)				
Alternate CCM(9) Alt Phone #(10)				
Originator's Name(11) Phone(12)				
Title of Change Standard Interval Changes for Loop (13)				
Category Add New Functionality Change Existing (14) Desired Due Date 11/30/00_(15) Originating CCM assessment of impact Major Minor None expected (16) Originating CCM assessment of priority Urgent High Medium Low (17)				
Interfaces Impacted (18) Pre-Ordering Ordering Maintenance Manual				
☐ Pre-Ordering ☐ Ordering ☐ Maintenance ☐ Manual ☐ LENS ☐ LENS ☐ EC-TA Local ☐ CSOTS ☐ TAG ☐ TAG				
Type Of Change - Check one or more, as applicable (19)				
Software ☐ Hardware ☐ Industry Standards ☐ Defect ☐ Product & Services ☐ New or Revised Edits ☐ Process ☐ Documentation ☐ Regulatory ☑ Other				
Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20) Changing internal tables to assign the correct standard interval for Loops as published in the Interval Guide. Currently the system is adding the 2 day FOC interval into the interval that is applied to the service order Known dependencies (21)				
Additional Information Yes No (22) List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)				



Change Request Form

This Section to be completed by BCCM only.	
Change Request Log #CR0219	(23) Clarification Yes No (24)
Clarification Request Sent/_/_(25)	Clarification Response Due//(26)
StatusN(27)	
Change Request Review Date//_(28)	Target Implementation Date 11/00 (29)
Last Modified By	(30) Date Modified/(31)
Change Review Meeting Results (32)	
Canceled Change Request Duplicate Train	ning Clarification Not Received (33)
Cancellation Acknowledgment CLEC E Request Appeal Yes No (35) Appeal Considerations (36)	3ST Date//(34)
Agreed Release Date/(37)	CMVC #(38) DDTS#(39)

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Change Request Form

This section to be completed by BellSouth - Internal Validation of Defect Change Request

Defect Validation Results: (40) Clarification Needed **⊠** No ☐ Yes Defect Feature Duplicate Training Issue Cancel Defect/Feature Impacts Other CLECs? Yes No TAG Interfaces Impacted by defect/feature: ☐ LNP LENS TCIF 7 ☐ TCIF 9 Target Implementation Date:

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Change Control Process Change Review Meeting Minutes

DATE:

September 27, 2000

MEETING:

Change Review Meeting

PURPOSE:

Monthly Status Meeting and Prioritize Pending Change Requests

ATTENDEES

Donna Graham - Mantiss	Manuel Lozano -	Kristen Hudson - XO
	Nightfire	Communications (formerly Nextlink)
Rae Dupraw - Mpower	Wayne Johnson - BST	Bob Henderson - SBC Telecom
Kevin McCall - BST	Cathy Swift - BST	Stuart Walters - Network One
Mike Young - Telcordia	Jill Williamson - AT&T	Peggy Rehm - Nightfire
Bill Grant - Telcordia	Brenda Jones - BST	Kathy Rainwater - BST
Lorriane Watson -	Sandy Evans - Sprint	Rodney Strawter - BST
WorldCom		
Brian Rutter - KPMG	Stephanie West - BST	Tyra Hush - WorldCom
Richard Woodhouse-	Renard Robinson - BST	Selange Roberts – E.spire
KPMG		•
Jamie Hunter - KPMG	Debbie Feir - BST	Woody Roe - Albion Connect
John Duffey - FL PSC	Joe Gray - BST	Kim Gillette-Hoskins - Quintessent
Cheryl Storey - BST	Valerie Cottingham -	Jerry Gaspardo - Mantiss
	BST	
Brenda Files - BST	Steve Hancock - BST	Edwardine Marrone - BST
Jim Lenihan - Sprint	Mark Grossman -	Rey McCabe - Network Telephone
	Telcordia	•
E. R. Stewart – BST	Jean Ann Fuller -	Les Hinton - PRISM
	Trivergent	

AGENDA

Agenda

Review status of all Types 2-6 Change Requests, review current Release Management statuses, report of system outages and discuss issues regarding the Change Control Process. Also Present, Discuss and Prioritize Pending Change Requests and Develop Candidate Change Request List.

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Opening

The BCCM opened the meeting and covered the items we were to accomplish at this meeting:

- Review outstanding action items
- Review regulatory mandates
- Review status of all Types 2-6 Change Requests
- Report of system outages
- Review current Release Management statuses
- Present and Discuss Pending Change Requests
- Determine Priorities and Develop Candidate Change Request List for Release 10
- Open Discussion Change Control Process
- New Issues/Action Items

A meeting will be scheduled in October to address CCP concerns/issues. Change Control will distribute notification of this meeting and solicit availability from the CLEC community.

Outstanding Action Items

12/13/00

1. Owner: BellSouth (CLOSED)

Investigate if there will be a standard process for handling 411 drops.

Status: The documented process for handling 411 drops and a standard form to be used to report 411 drops in batch will be presented at the 10/25/00 Monthly Status Meeting for CLEC input.

2. Owner: BellSouth (CLOSED)

Add CR0110 to CR Log.

Status: Added to CR Log 8/24/00.

3. Owner: BellSouth (CLOSED)

Send Steve Murray a copy of the CR Log and Defect/Expedite draft process that was discussed on the call.

Status: Sent 8/24/00 to Steve Murray via email.

4. Owner: BellSouth (CLOSED)

Investigate time intervals for defect/expedite workaround.

Status: BST will not be able to reduce the 4-day time interval for defect workaround.

5. Owner: BellSouth (CLOSED)

Investigate time interval for implementing a High Impact expedite.

Status: High Impact Expedites will be implemented in the current, next release or point release, best effort. High Impact Expedites will be assessed on a case-by-case basis for impacts, and scheduled as needed.

6. Owner: BellSouth (CLOSED)

Determine if BellSouth can provide a code "patch" (as a workaround) for expedites until a permanent fix is implemented.

Status: BST does not provide temporary code patches. We do provide workarounds for defects until they can be permanently fixed in a release. For defects, BST is committed to provide a workaround (when applicable) to the CLECs for the interim until the defect can be worked within the 4 to 25-business day range, best effort. The workarounds provided are not coding changes. The workarounds provide an alternative way to submit an order electronically or manually. BST utilizes resources to fix defects permanently in a release. For High Impact expedites, there is no electronic workaround. BST has committed to implement these in the current, next release or point release, best effort. These will be assessed on a case-by-case basis for impacts, and scheduled as needed. If necessary, an emergency point release would be implemented.

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7. Owner: BellSouth (OPEN)

Determine if Process and M&P changes are included in the posting of notifications of documentation updates (non-system changes) 5 days prior to the documentation posting date.

Status: Received clarification on this issue from the originator (AT&T). AT&T requests 30 day interval because 5 days is sometimes not sufficient if process changes need to be made internally. BST is investigating.

8. Owner: BellSouth (OPEN)

Investigate search/sort capability for CCP web site.

Status: BellSouth has determined that it does not have the software to support this function.

However, BST is in the process of determining the cost of additional software.

Outstanding Action Items from 9/18/00 Release 8.0 Package Meeting:

9. Owner: BellSouth (CLOSED)

OS/DA Routing – Determine process for other CLECs to utilize if interested in selective routing. **Status:** Basic OS/DA routing functionality will be provided with Release 8.0 in November. CLECs interested in this functionality will not need to submit a Change Request; however, they will need to work with their Account Team to establish Line Class Codes and identify other unique characteristics that may be required.

10. Owner: BellSouth (OPEN)

Coding codes -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 size of release as to amount of advance notice needed.

Status: BST investigating.

Outstanding Action Items from 9/22/00 Release 8.0 Package Meeting:

11. Owner: BellSouth (OPEN)

CR0016 - SI Enhancement - Association with 319 products. Why are 319 products targeted for late

2001?

Status: BST investigating.

12. Owner: BellSouth (OPEN)

CR0002 - Pre-order/Order Field Discrepancies - defect vs. feature.

Status: BST is treating this issue as a feature because business rules reflect current coding. The application is operating as specified. CLECs advised this is a requirements defect and that the defect/expedite process is not working. BST is currently pursuing the possibility of implementing this change in Release 9.0.

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Regulatory Mandates

CR0169 - Number Conservation Rules for Number Pooling (BellSouth)

FCC99-200 (revised on 3/31/00 to FCC00-104).

Florida 954 – FCC99-249.

Florida State PSC docket number is 981-444TP.

FCC has mandated Number Pooling in the Southeastern Region to avoid additional NPA NXX exhaust. Number Pooling is a process that allocates NPA-NXXs at the thousand-block level (NXX-X) within the rate center using LNP network infrastructure. It allows sharing of central office codes (NXXs) among multiple service providers serving the same rate center (TMRC). BellSouth is making updates internally to allow pooling. Targeted for Release 9.0 01/06/01 and 01/20/01. LSR changes are not necessary for Pooling.

Please see attached PowerPoint presentation.

CR0059 - Change TN Reservation Period to 45 days (pre-ordering functionality) (BellSouth)

FCC Docket # 99200

Order # FCC00-104

Target date for implementation is 4Q00.

CR0153 – CO Based Line Sharing (BellSouth)

FCC Docket # 98-147

Scheduled for Release 7.1 September 30, 2000.

EDI Infrastructu re Upgrade Overview

BellSouth is involved in a project to upgrade our EDI infrastructure. The new infrastructure will facilitate requests from Change Control, such as the CLEC Test Environment. The new infrastructure will also allow improvement in the delivery of Functional Acknowledgements, Firm Orders Confirmations, Notifications, Pending Order Status, etc. The target for migration of the CLEC EDI Application to the new infrastructure is December 1,2000. A CLEC Notification Letter will be sent in the next 30 days.

To accommodate the migration to the new infrastructure BellSouth will freeze the EDI maps from October 6 until December 1, 2000. This freeze may delay the implementation of features that require a new or modified field for BellSouth and/or CLEC use. BellSouth will freeze the turn up of new EDI Trading Partners and new IP addresses from October 13 until December 15, 2000. It is BellSouth's desire to acknowledge all requests received prior to October 13, 2000. Requests received during the freeze window will be honored after December 15, 2000.

An EDI User Group will be formed for the purpose of discussing the following:

Details associated with the migration to the new infrastructure

Development of requirements for Interactive Agent

Development of requirements for pre-order functions

If you would like to take part in the EDI User Group please send an e-mail to Change Control by October 6, 2000, with the following information:

Name of Company

Contact Name, Telephone Number, Email Address, and Mailing Address

Topics of Interest

A meeting of the EDI User Group will be targeted for the week of October 9, 2000.

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New Change Requests (Types 2-5)

ORD030200 001 - UNE via ASR21 (AT&T & WorldCom)

Status: Jill (AT&T) and Tyra (WorldCom) advised to leave this CR open.

ORD032700_001 - Post-FOC Clarification (AT&T)

Status: Conference call held 8/10/00 with originator and BST SME to discuss options. It was determined that the pending pre-order CR TAG0812990001 (provide CFA information, NC/NC1 codes) is a possible solution. CR TAG0812990001 is targeted for Release 10 on 5/30/01. Jill (AT&T) advised this CR could be canceled.

CR0012 - TAFI Functionality via ECTA Interface (AT&T)

Status: AT&T advised to leave this request open to continue discussions with BellSouth.

CR0065 – Add LENS 6.3 Tutorial (Trivergent)

Status: Originator advised to leave this CR on hold until they review the new web-based LENS course, which should be available late September.

CR0087 - "C" Order Process for UNE-P (Sprint)

Status: Conference call held on 09/25/00 with originator and BellSouth. BellSouth has committed to forward Sprint information on return FOC. Sprint will review information and determine if CR can be canceled.

CR0093 - Electronic Change Notifications (Sprint)

Status: On 09/15/00 originator requested place CR on hold.

CR0095 – ECTA – Attribute Validation (BellSouth)

Status: Open for CLEC comments on whether this is a feature they would like to see implemented.

CR0104 – LENS Large Account Inquiry (Marietta Fibernet)

Status: Placed in Pending status 9/26/00. Originator requested that we include on Prioritization list since this CR was submitted prior to the 8/15/00 cut-off date.

CR0105 - Drop the RES ID to Requirement for xDSL Order (Nightfire)

Status: Conference call held on 0915/00 with originator. Originator advised this issue is still under review until testing is complete.

CR0130 - LESOG not Responding to "C" order adding line & features on Resale Accounts (BellSouth)

Status: Reclassified as a feature. Being reviewed for acceptance.

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CR0132 - Fielded Completion Notifications (WorldCom)

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Status: Conference call held on 09/25/00 with originator. Originator agreed to forward information on OBF to Change Control. BST SME to revisit this issue.

CR0135 - Merging of Accounts (AT&T)

Status: BellSouth is currently waiting on a reply to the response sent to the originator on this request. Jill (AT&T) questioned why CRs should be held until OBF resolves issues when CLEC's business needs may be more urgent. Jill stated this should be a joint decision regarding the disposition of CRs that are being addressed by OBF. Change Control will revisit and provide status.

CR0143 - Notification - MDR (Mechanized Disaster Reports) (Verizon)

Status: BellSouth response due to CLEC by 10/17/00.

CR0144 - Add LSR Codes in LENS (BellSouth)

Status: Being reviewed for acceptance

CR0145 - Remove a TN from a LENS LSR (BellSouth)

Status: Being reviewed for acceptance

CR0146 – Default the Listed TN (BellSouth)

Status: Being reviewed for acceptance

CR0147 – Seasonal Suspend (BellSouth)

Status: Being reviewed for acceptance

CR0152 – Electronic Payphone Service Orders (BellSouth)

Status: Being reviewed for acceptance

CR0157 - Need to Handle HTG USOCs for all calling plans on Port/Loop Combos (BellSouth)

Status: Reclassified as a feature. Being reviewed for acceptance.

CR0158 - Already Pending Error message on LSRs where order is being held to not auto clarify (BellSouth)

Status: Reclassified as a feature. Being reviewed for acceptance.

CR0165 – Discrepancies in BellSouth Guidelines CG-LEO0-009-LNUMfield on Loop Service Page (Nextlink)

Status: Being reviewed for acceptance.

CR0166 – Cable ID Defect (BellSouth)

Status: Reclassified as a feature. Being reviewed for acceptance.

CR0167 - Incorrect Circuit # on FOC (BellSouth)

Status: Reclassified as a feature. Being reviewed for acceptance.

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Pending

The following Change Request is in pending status:

Change Requests

TAG0812990003 – Parsed CSR (AT&T)

Status: Will begin jointly addressing 10/3/00. Once BST has a better understanding of CLEC requirements and complexity of this effort, this feature will be targeted for an upcoming release.

CR0134 – TN Reservation Display of Switch CLLI (AT&T)

Status: Guidelines to be added by the end of October 2000 to the HELPFUL HINTS section of the BellSouth Pre-Order Business Rules document to further clarify the BellSouth response to this request.

Scheduled

The following Change Requests are scheduled for upcoming releases:

Change Requests

- EDI0812990003 411 Drops (AT&T) Targeted for Release 9.0 01/06/01
- EDI0812990004 Change Main Account Number (AT&T) Targeted for Release 10.0 -05/31/01
- EDI0812990005 Handling of Remaining Services (AT&T) Targeted for Release 10.0 05/31/01
- EDI0812990007 Use of LEAN/LEATN Fields (AT&T) Targeted for Release 10.0–05/31/01
- TAG0812990001 Provide CFA & NC/NCI Codes (AT&T) Targeted for Release 10.0 05/31/01
- EDI1215990001 TN vs RSAG Validation (AT&T) –Targeted for Release 9.0 01/06/01
- EDI020900_001 Electronically Order Routing to OS/DA (AT&T) Release 8.0 11/18/00
- EDI030300_001 CLEC test environment (AT&T) Targeted for Rel 8.1 12/09/00
- CR0002 Pre-Order/Order Business Rules Discrepancies (AT&T) Targeted for Release 10.0 05/31/01
- CR0003 RPON Electronic Reject & Flow Through (AT&T) Targeted for Release 9.0 -01/06/01
- CR0014 Change Verbiage on LENS Screen (Trivergent) Release 8.0 11/18/00
- CR0015 LENS ACT of C Change Basic Class of Service (BellSouth) Release 8.0 -11/18/00
- CR0016 SI Enhancement for SL1, SL2, DS0, DS1 and ISDN (AT&T) Targeted for Release 10.0 – 05/31/01
- CR0029 Partial Migration of UNE Loops (ReqTyp A) (BellSouth) Targeted for Release 10.0

 05/31/01
- CR0030 UNE to UNE Migrations (BellSouth) Targeted for Release 9.0 01/06/01
- CR0038 TOS Field on LSR ReqTyp J (BellSouth) Targeted for Release 10.0 05/31/01
- CR0040 Order Tracking Request (AT&T) Targeted for Release 10.0 05/31/01
- CR0045 Conversion As Is Strip Non-Resellable USOCs (One Point) Release 8.0 -11/18/00
- CR0059 Change TN Reservation Period (BellSouth) Targeted for 4Q00
- CR0078 Extended Loops (AT&T) Targeted for implementation late 2001 with other 319 products
- CR0109 GA 912/229/478 NPA Splits (BellSouth) Release 7.2 10/14/00
- CR0112 Conversion As-Is ACT W Defect (Southern Telecom) Rel. 7.1 9/30/00
- CR0115 Partial Pre-Order Query Due Date Calculation (BellSouth) Rel 7.1 9/30/00
- CR0116 Premise Visit Indicator (BellSouth) Rel 7.1 9/30/00
- CR0118 Remove Housenumprefix for TAG API 2.2.0.10 (BellSouth) Rel. 7.1 9/30/00

- CR0129 LESOG failing to apply ZRTI to orders (BellSouth) Rel 7.1 9/30/00
- CR0150 Add NPT Data Element to the ESDQ Query (BellSouth) Rel 7.1 9/30/00
- CR0153 CO Based Line Sharing (BellSouth) Rel. 7/1 9/30/00
- CR0159 Discrepancies in BBR-LO Version 9G (BellSouth) 9/28/00 update (9H)
- CR0169 Number Pooling Mandate (BellSouth) Rel 9.0 01/06/01 and 01/20/01

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Implemented Change Requests

- LSR0623990001 Redirection of UNE LSRs in the LCSC (AT&T) LNP Rel 5.1 8/27/00
- CR0077 Subscription Version Cancellations (AT&T) LNP Rel 5.1 8/27/00
- CR0089 Reserving TNs via LENS (Advanced Tel) Rel 6.4 6/17/00.
- CR0092 DFDT & CHC Defect Request (AT&T) LNP Rel 5.1 8/27/00 (EDI only)
- CR0102 NUM=TELNO=ACCT is Final Reject (Access One) Release 7.0 7/29/00.
- CR0106 Delay Sunset of LSOG2 xDSL Ordering via Fax (Nightfire) delayed until 10/2/00.
- CR0125 Error when placing a change order to add VCA and RJ11C in LENs (New South) Rel 7.0 - 8/12/00.
- CR0141 LESOG should D&E vs. C&T when no CFN changes (BellSouth) Rel 7.0 8/12/00.

Canceled Change Requests

The following change requests have been cancelled since our August 23 meeting:

CR0013 - Date Sent/Century Defect (EDI) (Nextlink)

CR0018 – USOC Segmentation (AT&T)

CR0033 - EDI Multiple ReqTyp Enhancement (Nextlink)

CR0039 - FOC Not Populating Order Number on Port Order (American Metrocom)

CR0066 - Invalid USOC for Basic Class of Svc. Format SAE434 II CREX/TN (AT&T)

CR0070 - Call Forwarding USOC Defect (AT&T)

CR0107 - Documentation Defect - CIC (AT&T)

CR0114 – TN Reservation Defect (AT&T)

CR0120 - SOCS RT60 Invalid NPA/NXX for Routing SUB 001 (BellSouth)

CR0123 - LENS Application Enhancement (Gulf Coast Communications)

CR0140 - Update the Due Date Calculation Intervals in TAG (combined with CR0117) (BellSouth)

Defect/Expe dite Change Requests (Type 6)

The following change requests statuses are provided:

 CR0008 - YPQTY-WPQTY (Iss 7) ReqType -E Reject Code must be 2 numerics -(Deltacom)

Status: Open - Currently under appeal.

• CR0023 – OSS'99 Ordering Guidelines – (AT&T)

Status: Open – Validation response provided on 5-3-00. AT&T has requested that this remain open until all guidelines have been updated.

• CR0024 – Hunt Group Defect on a Separate CSR – (Adelphia)

Status: Open - Validated as a defect to be targeted for a future release.

CR0049 – LENS TNs for each PON on bulk order (BST)

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Status: Open – Pending clarification.

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• CR0050 – LENS 6.3 - # of Directories for white & yellow (BST)

Status: Determined to not be a defect, but will be entered as a feature to be targeted in a future release.

• CR0056 - Invalid SUP, Subscription Version Defect - (AT&T)

Status: Determined to be a training issue and pending feedback from originator. AT&T advised to close this request.

CR0070 – Call Forwarding USOC Defect (AT&T)

Status: BellSouth determined this not to be a defect. The USOC populated is not valid with the FID

provided. The USOC GCE is call forwarding busy line, the CFND FID with RCYC is for call forwarding don't answer. Originator advised to close this CR.

- CR0073 LEO should pull Ported number & return on FOC/CN (BST) Status: Determined to be a defect and will be corrected in a future release TBD.
- CR0074 TAG is requiring the end user address in error for ReqTyp E: Act of C (BST) Status: Determined to be a defect and is targeted for a future release TBD.
- CR0079 TAG IS REQUIRING "INIT" (BellSouth)

 Status: Open BellSouth determine that this request is not a defect. The system works per requirements. Originator has appealed the validation response.
- CR0080 LESOG is failing to issue Port Loop Combo accurately (BellSouth)

 Status: Verified Electronic System Support (ESS) has determined that this is a defect and will be corrected in a future release.
- CR0082 LEO IS FAILING TO EDIT FOR LOCQTY (BellSouth)

 Status: Open BellSouth requested further clarification from originator.
- CR0098 Re-Calculate Due Date Intervals (BellSouth)
 Status: Open BellSouth has determined that this is not a defect. Waiting on originator to close out.
- CR0099 ORDER MA'D AND SERVICE ORDER INFO DELETED (BellSouth)

 Status: Open BellSouth has determined that this is not a defect, however the decision is being made as to whether this will become a feature.
- CR0100 TAG is failing to accurately calculate due dates on deny and restore (BST)

 Status: Determined to not be a defect, however a feature will be opened targeted for a future release.
- CR0108 Listings over the number of 2 are not shown on LSR or order (BST)

 Status: BellSouth determined that this is a defect and is being targeted for a future release TBD.

 Manual intervention is recommended.
- CR0110 LESOG not populating ZNEA & ZNHC on ACT of N or C (BST)

 Status: BellSouth determined that this is not a defect, but recommended that a Feature be opened. This feature will be targeted for a future release TBD.
- CR0121 Discrepancies in BellSouth Guidelines CG-LSOR-002 (Nextlink)

 Status: BellSouth has reclassified from a Feature to a Defect. Originator advised to close this request.
- CR0126 LESOG should pull the correct CFN number for enhanced MMC (BST)
 Status: BellSouth determined that this is a defect and will be corrected in a future release TBD.
- CR0136 Address Validating in LENS but not in TAG on old RSAG history (BST)
 Status: BellSouth determined that this is a defect and will be targeted for a future release TBD.
 - CR0142 Remove the business reference for RCFRE, RF, RG & RN in the RCF matrix of the LEO IG (BST)

Status: Determined to be a documentation defect and correction is targeted for Sept. 29.

• CR0151 – Error Code Defect (LNP) (AT&T)

Status: BellSouth is recommending that a Feature be opened to correct the LNP truncation. The feature will be implemented in a future release TBD.

CR0154 – Missing Completion Notices Defect – (AT&T)

Status: BellSouth validated that the completion notices did not go back to AT&T because they were manually handled by a Service Rep. AT&T will be appealing this response for further validation.

• CR0155 – Ringmaster Defect (AT&T)

Status: BellSouth determined not a defect. Recommended to AT&T that this is a training issue. Originator advised to close this request.

• CR0156 – Connect:Direct Request – (AT&T)

Status: BellSouth recommended to AT&T to submit this as a change request for all CLECs benefit. System changes have been made and AT&T is waiting to test with BST.

• CR0162 – OTN Defect Issue 7 (Deltacom)

Status: BellSouth has determined that this is a defect and will be targeted for a future release.

• CR0163 – LESOG should not bring over FIDs on line USOCs for LNA of G (BST)

Status: BellSouth has determined that this is a defect and will be targeted for a future release.

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Report of System Outages

The following Type 1 System outages have occurred since the last Status Meeting:

LENS - 3

EDI - 1

TAG - 3

CSOTS - 1

Details of each outage are posted on the Change Control Website at www.interconnection.bellsouth.com.

Release Management Status

Release 7.1 is scheduled for 9/30/00:

- CR0112 Conversion As-Is ACT W Defect (Southern Telecom)
- CR0115 Partial Pre-Order Query DDC (BellSouth)
- CR0116 Premise Visit Indicator (BellSouth)
- CR0118 Remove HOUSENUMPREFIX from TAG (BellSouth)
- CR0129 LESOG Failing to apply ZRTI to orders (BellSouth)
- CR0150 Add NPT Data Element to the ESDQ Query (BellSouth)
- CR0153 CO Based Line Sharing (mandate) (BellSouth)

Release 7.2 is scheduled for 10/14/00:

CR0109 – GA 912/229/478 NPA Split (BellSouth)

Release 8.0 is scheduled for 11/18/00:

- EDI020900_001 Electronically Order Routing to OS/DA (AT&T)
- CR0014 Change Verbiage on LENS Screen (Trivergent)
- CR0015 LENS ACT of C Change Basic Class of Service (BellSouth)
- CR0045 Conversion As Is Strip non-resellable USOCs (One Point)
- OSS99 TAG DID (BellSouth)
- TAG Hardware upgrades (BellSouth)

The target date for Release 8.1 is 12/9/00:

EDI030300_001 – CLEC test environment (AT&T)

The target date for Release 9.0 is 01/06/01:

- CR0169 Number Pooling Mandate Florida only (BellSouth)
- CR0030 UNE to UNE Migrations (BellSouth)
- EDI0812990003 411 Drops (AT&T)
- CR0003 RPON Electronic Reject & Flow Through (AT&T)
- EDI1215990001 TN vs RSAG Validation (AT&T)

The target date for Release 9.0 is 1/20/01:

• CR0169 - Number Pooling Mandate-all other states (BellSouth)

The target date for Release 10.0 is 5/31/01:

- CR0002 Pre-Order/Order Business Rules Discrepancies (AT&T)
- TAG0812990001 Provide CFA & NC/NCI Codes (AT&T)
- EDI0812990005 Handling of Remaining Service (AT&T)
- EDI0812990004 Change Main Account Number (AT&T)
- EDI0812990007 Use of LEAN/LEATN Fields (AT&T)
- CR0016 SI Enhancement for SL1, SL2, DS0, DS1 and ISDN (AT&T)

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- CR0029 Partial Migration of UNE Loops (BellSouth)
- CR0038 TOS Field on ReqTyp J (BellSouth)
- CR0040 Order Tracking Request (AT&T)

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PENDING	The following pending change requests were presented/discussed:	
CHANGE	View Multiple CCDs Simultaneously (Tripersons)	
REQUESTS	View Multiple CSRs Simultaneously (Trivergent) Interface Impacted - LENS Pre-ordering	
REQUESTS	Type Change – Add New Functionality	
Pre-Ordering	· · · · · · · · · · · · · · · · · · ·	
_	Capability to view multiple CSRs simultaneously in LENS	
CR0020	EDI Pre-Ordering Functionality (Nightfire)	
CR0101	Interface Impacted – EDI Pre-Order	
CROTOL	Type Change – Software	
	New functionality to include a new EDI Pre-order solution	
	1 Tew functionality to include a new EDI 11c-order solution	
CR0104	LENS Large Account Inquiry (Marietta Fibernet)	
CITOID.	Interface Impacted -Pre-ordering	
	Type Change – Software	
	On Large ESSX or Centrex accounts, add capability to access numbers behind SLA's instead of	
	going to non-key lines and searching entire list of numbers.	
CR0113	LENS Inquiry - View Customer Record (Southern Telecom)	
	Interface Impacted -Pre-Ordering	
	Type Change – Software	
	• Change existing functionality to allow a three digit customer code to be used in the validation of	
	a customer record	
CR0127	Provide Pending Service Order for CSR via TAG (ITC Deltacom)	
	Interface Impacted -Pre-Ordering	
	Type Change – Software	
	New functionality to alert the end user that a CSR is pending a Service Order during the pre-	
	order step.	
Ordonina	Ability to change listing account in LENS (Alltel)	
Ordering	Interface Impacted - Ordering	
CR0031	Type Change – Change Existing	
	Ability to submit an order to change a listing on a CLEC owned NXX	
	Ability to submit an order to change a listing on a CLEC owned NAX	
CR0068	Pipe-Cross USOC (AT&T)	
C110000	Interface Impacted - Ordering	
	Type Change – Software	
	Modify requirements to remove the Cross pipe line not part of CSR issue.	
CR0085	Web-based LSR (BellSouth) Docket No. 000731-TP	
	Interface Impacted – LENS Ordering JMB-R8	
	Type Change – Software Page 14 of 21	
	Place LSR templates on the WEB in the LENS site for manual CLECs to submit electronically	
	Editing will be done in LEO	
	FOC and other responses will be posted on the WEB for CLEC to retrieve	
	Electronic rate will apply	
	Front-end system will allow CLEC to download a copy of the completed LSR to SUP later.	
	• 1st phase will include same ReqTyp's that can be submitted through LENS today.	

	
CR0088	Mech of Unbundled Network Terminating Wire (UNTW) (Media One)
	Interface Impacted - Ordering
	Type Change - Software/Documentation/New or Revised Edits
	Provide functionality to submit UNTW order electronically.
CR0091	Add DFDT to the FOC (AT&T)
	Interface Impacted - Ordering/LNP
	Type Change – Software
	• Confirm back the specific time in which the order will be cut, i.e., the requested Frame Due
	Time, on the FOC.
	BellSouth will issue a jeopardy notice to the CLEC and call to negotiate the cut time if BellSouth
	realizes it will not make the requested DFDT.
CR0096	New Listings in LENS (Alltel)
	Interface Impacted -Ordering
	Type Change – Software
	New functionality to allow the user to create "New Listings" in LENS
CR0117	Update Issue 7 Due Date Calculation Intervals in TAG (BellSouth)
CKU11/	Interface Impacted – TAG Pre-Order/Ordering
	Type Change – Software/Documentation
	Modify the Issue 7 Due Date Calculation Modules to update the tables in the TAG API with the
	BellSouth Product and Services Interval Guide.
····	NOTE: This CR was implemented with TAG Release 2.2.0.11 on September 21. This change was included with the due date calculation tables. This CR was removed from the prioritization list.
CR0133	Migration of UNE-P Notifications (WorldCom)
	Interface Impacted -Ordering
	Type Change - Software/New or Revised Edits
	 Allow CLECs to migrate using Customer Name and TN, and not be required to supply the Service Address on ACT=V, P, Q to UNE-P.
	NOTE: This CR combined with EDI1215990001. This CR was removed from the prioritization list.
CR0137	Flow-Through Change Request-ReqTyp CB (AT&T)
CRUIS	Interface Impacted –LNP Ordering
	Type Change – Software
	Change existing systems to allow REQTYP CB, ACT P & Q to flow-through BellSouth systems
	without manual intervention
CR0149	Modify and Resend FOC and Clarifications (BellSouth)
CHUITA	Interface Impacted – LNP Ordering
	Type Change – Software
	Change existing systems to allow the ability to change a LSR status from Submitted to Clarified and/or Clarified to Submitted FOC
	Docket No. 000731-TP
CR0160	Flow-Through Change Request-ReqTyp BB (AT&T) JMB-R8
-	Interface Impacted –LNP Ordering Page 15 of 21

Type Change - Software

• Change existing systems to allow REQTYP BB, ACT P & Q to flow-through BellSouth systems without manual intervention

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MANUAL	Split Billing Requests (BellSouth)	
	Interface Impacted - Manual	
CR0131	Type Change - Documentation/Process	
	Change existing functionality to provide instructions on how to su	bmit split billing requests
Documenta	Improvements to the BellSouth Business Rules for Local Ordering	(Adelphia)
tion	Interface Impacted - All	•
CR0053	Type Change - Documentation	
CITOUSS	Present the information in separate documents to reduce the size of	of the guide
	BST can separate the BBR-LO into separate guides. Efforts are under	way to provide an enhanced
	"Search" capability, which will make navigating through the BBR-LC	much easier. Also removir
	APPENDIX A information and moving Forms & Line-by-Line instruc	ctions back to the Complex
	Templates document is under evaluation.	
CR0139	Update TAG API Guide to relate to the BellSouth Pre-order Busin	ness Rules (BellSouth)
	Interface Impacted - TAG Pre-Order/Order	, ,
	Type Change – Documentation	
	Better clarification between the API Guide and the BellSouth Pre-	Order Business Rules
Final	The results of the prioritization are as follows:	
Prioritization	-	
	Pre-Ordering Category	
	Rank #1 - CR0127 - Provide Pending Service Order for CSR via TAC	G (ITC Deltacom)
	Rank #2 - CR0113 - LENS Inquiry - View Customer Record (Souther	
	Rank #3 - CR0101 - EDI Pre-Ordering (Nightfire)	
	Rank #4 – CR0020 – View Multiple CSRs Simultaneously (Trivergen	•
	Rank #5 - CR0104 - LENS Large Account Inquiry (Marietta Fibernet	t)
	Ordering Category	
	Rank #1 – CR0091 – Add DFDT to the FOC (AT&T)	
	Rank #2 - CR0149 - Modify & Resend FOCs & Clarifications (BellS	outh)
	Rank #3 - CR0137 - Flow Through for REQTYP CB, ACT P & Q for	LNP (AT&T)
	Rank #4 - CR0160 - Flow Through for REQTYP BB. ACT P & Q for	Loop w/LNP (AT&T)
	Rank #5 – CR0068 – Pipe Cross USOC (AT&T)	
	Rank #6 - CR0088 - Mech of Unbundled Network Terminating Wire	
	Rank #7 - CR0096 - LENS Enhancement - Add New Listings (Alltel	•
	Rank # 8 – CR0031 – Ability to Change Listing Account in LENS (A	lltel)
	Rank # 9 – CR0085 – Web-based LSR (BellSouth)	
	Manual Category	Docket No. 000731-7
	CD0101 Calla Dillia a Ramonta (DallGanda)	JMB-R8
	CR0131 – Split Billing Requests (BellSouth)	Page 17 of 21
	Documentation Category	<u> </u>
	Rank #1 - CR0139 - Update TAG API Guide to Better Relate to the TAG Pre-Order Rules	
	Name #1 - CRU139 - Opulie 1 AO Art Guide to Better Relate to the	AU Pre-Order Kules

Rank #2 - CR0053 - Improvements to the BBR-LO (Adelphia)

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Open Discussion- Change Control Process	No new CCP issues were raised. We will be discussing the ones reflected in the "Action Items" section at our October Process Improvements meeting.	
Upcoming Meetings	 Parsed CSR (CR# TAG0812990003) conference call is October 3, 2000 from 10:00 AM – 12:00 Eastern. The conference bridge is 205-970-3742, access code 6637. EDI User Group meeting is targeted for week of October 9, 2000. Release 8.0 User Requirements meeting targeted within two weeks. CCP Process Improvements meeting to be scheduled October 17 or 26 (refer to 9/28/00 email requesting availability). Our next monthly status call is October 25, 2000. The conference bridge is 205-970-3741, access code 4736. Target date for the Internal Change Management Process to be completed is November 13, 2000. During the Internal Change Management Process, both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities for the Candidate Change Requests. A Release Package Meeting will be held in conjunction with our Monthly Status Meeting on November 15 to present/discuss the scope of Release 10.0 (targeted for 05/31/01). 	
Action Items	 Owner: BellSouth (CLOSED) Distribute notification to CLEC community regarding October CCP Process Improvements meeting. Status: Distributed 9-28-00. Owner: BellSouth (OPEN) Provide revision history with Carrier Notification Letters associated with documentation updates. This issue to be addressed at the October Process Improvements meeting Owner: BellSouth (OPEN) 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 Improvements 	
	4. Owner: BellSouth (OPEN) Defect/expedite process. This issue to be addressed at the October Process Improvements meeting. 5. Owner: BellSouth (OPEN) BST provide milestones for release management. This issue to be addressed at the October Process Improvements meeting. 6. Owner: BellSouth (CLOSED) Change Control will provide soft copy of Number Pooling presentation. Status: Presentation provided with 9/27/00 meeting minutes. Docket No. 000731- Status: Presentation provided with 9/27/00 meeting minutes. JMB-R8 Page 19 of 21 Change Control will distribute patification regarding EDI Infrastructure Uncords Subtages	
	Change Control will distribute notification regarding EDI Infrastructure Upgrade Sub team. Status: Distributed 9-29-00. 8. Owner: CLEC Community (OPEN) CLEC Community will send Change Control any identified requirements for Parsed CSR.	

9. Owner: BellSouth (OPEN)

Investigate if reason for system outage can be provided on notification.

10. Owner: BellSouth (OPEN)

Include associated documentation on CCP Release schedule.

11. Owner: BellSouth (CLOSED)

Provide Web site location for CCP Release Schedule.

Status: The CCP Release Schedule is located at the following Web site:

www.interconnection.bellsouth.com

Select "Local Exchange Carriers"

Select "Change Control Process"

Select "Statuses/Release Notification/Proposed Release Schedule"

12. Owner: BellSouth (OPEN)

Add the originator to the title column on the CR Log.

13. Owner: BellSouth (OPEN)

Change the format of the BellSouth Business Rules for Local Ordering (BBR-LO) guide. This issue to be addressed at the October Process Improvements meeting.

14. Owner: BellSouth (CLOSED)

Provide CLECs where general information can be found on 319 products.

Status: Information on 319 products can be found on the Interconnection Web site at the following

location:

www.interconnection.bellsouth.com

Select "Local Exchange Carriers"

Select "CLEC Products"

Select "UNE Products"

Questions regarding the 319 Products should be directed to your Account Team representative.

15. Owner: BellSouth (OPEN)

Revisit CR0135 and provide originator status.

16. Owner: BellSouth (OPEN)

Determine if notification of BST process changes (i.e., system downtime, LCSC processes) can be provided 30 days in advance to accommodate CLEC's internal M&P changes.

17. Owner: BellSouth (OPEN)

Investigate cost for additional software needed to support the search/sort capability for CCP web site

18. Owner: 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 size of release as to amount of advance notice needed. This will be addressed at the October CCP Process Improvements meeting.

19. Owner: BellSouth (OPEN)

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CR0016 - SI Enhancement - Association with 319 products. Why are 319 products targeted for late 2001.

20. Owner: BellSouth (OPEN)

CR0002 - Pre-order/Order Field Discrepancies. BST pursuing the possibility of implementing this change in Release 9.0.

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October 17, 2000 CCP Process Improvement Meeting MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY	DATE PREPARED
COR DECORES IN ADDIO		
CCP PROCESS IMPROV	EMENT Steve Hancock - Change Control Tear	II 10-18-00 -
BellSouth Conference Cent		
Bellouth Conference Cent		

Participants/Attendees

Participants/Attendees	COMPANY
Terrie Hudson	BST - NCS/CS
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Jill Williamson	AT&T
Bill Grant	Telcordia
Mike Young	Telcordia
Brian Rutter	KPMG
Kevin McCall	BST - NCS/CS
Kathy Rainwater	BST - NCS/CS
Bill Shoemaker	BST - NCS/CS
Steve Hancock	BST - CCP
John Duffey	FL - PSC
Woody Roe	Albion-Connect
Selange Roberts	espire
Phyllis Burt	Quintessent

PARTICIPANT	COMPANY
Rick Woodhouse	KPMG
Graham Watkins	KPMG
Shamone Stapler	ITC/Deltacom
Mary Conquest	ITC/Deltacom
Stephanie Smith	dset
Yvette Brown	espire
Rae Dupraw	Mpower
Sandy Evans	Sprint
Tyra Hush	Worldcom
Lorraine Watson	Worldcom
Steve Murray	Rhythms
Kim Gillette-Hoskins	Quintessent
James Hunter	KPMG
Ron Thompson	XO
Peggy Rehm	Nightfire

Meeting Information History

DATE	START TIME	END TIME	}
10/17/00	9:00 AM EDT	12 NOON EDT	l
,,	7.00		
MEETING PURPOSE		<u></u>	<u> </u>
Personal Property and Mark Company and	gratur gratur Landrich	SOUTH PRESENTATION CHESTON	The second of the contract of the second of
To befter und	erstand the CLEC's	needs with regard to	o the Change Control Process.
with the second	ي الدال المواقعية الأنجيتين م- فع يراهيا ال	TAX COLUMN	July 5 77 77 74 74

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October 17, 2000 CCP Process Improvement Meeting MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
PROVIDE REVISION HISTORY FOR DOCUMENTATION UPDATES. Carrier Notification Letter needs to provide.	Jill Williamson - (AT&T) requested that BST provide additional details in Carrier Notification Letters; all Business Rules/documentation changes need to flow through CCP.
more details regarding the changes	Valerie Cottingham (BST) explained that CCP has begun to send the revision summary prior to the documentation being posted to the web.
	Woody Roe - (Albion Connect) reiterated that anything (documentation) that is touched should go through the CCP process. All customer notification letters that announce documentation changes should reference a change request that has been submitted through CCP.
	Tyra Hush (Worldcom) stated that if customer notification letters have OSS impact, they should be discussed in CCP meetings.
	Kathy Rainwater - (BST) explained that BellSouth is currently looking at new software that will be used to facilitate documentation changes more easily. BellSouth's intent is to make these documents more "user friendly".
	ACTION ITEM (BELLSOUTH) - Revision History should be attached to associated Carrier Notification Letters.
2. Have BST SMEs available at the Monthly Status Meetings to discuss the	Steve Murray (Rhythms) emphasized that BellSouth should have someone at the meetings with the power to make commitments.
specifics of the Carrier Notification Letters distributed by Change Control	Valerie Cottingham (BST) explained that CCP had provided SMEs at the last two (2) monthly status meetings as well as the 9-27 Change Review Meeting and would continue to support providing SMEs at meetings. Having the SME's in attendance greatly helped to expedite discussion and facilitate the meetings. The CLECs need to provide two (2) weeks notification for SME participation.
	Jill Williamson - (AT&T) stated that it was OK to give advance warning to allow time for SMEs to address an issue at a given meeting.
	Tyra Hush (Worldcom) agreed that the SMEs especially needed to be available for monthly meetings with regard to OSS and documentation questions/issues.
	Jill Williamson - (AT&T) discussed that there are times when issues are discussed with Account Teams that should have a change request initiated.
	ACTION ITEM (BELLSOUTH) - Determine who initiates a change requires when identified by a CLEC and Account Team.



October 17, 2000 CCP Process Improvement Meeting

Agenda Items	Discussion	
3. THE DEFECT/EXPEDITE PROCESS	Jill Williamson (AT&T) explained that her "proposed" changes were provided in the "marked up" version of the CCP Process document she submitted. It summary, she went on to explain that AT&T is asking for improvements in turnarounds and to separate the defects from expedites.	
	Bill Grant (Telcordia) discussed his concern with BellSouth's definition of a defect and a feature. He emphasized that just because BellSouth determines an issue is "working according to the baselined requirements" does not negate the fact that it is still a "defect" to the CLECs.	
	Terrie Hudson (BST) explained that these definitions are a result of our vendor contracts with our IT suppliers.	
	ACTION ITEM (BELLSOUTH) - There needs to be a "common" definition of defects. ACTION ITEM (CLECs/BELLSOUTH) - Separate Defects from Expedites ACTION ITEM (CLECs/BELLSOUTH) - Segment response time based on the "severity" of the defect.	
	Woody Roe (Albion-Connect) reemphasized that the CLECs do not want a "fix" several releases and versions later. He stated that he needs the fix to occur on the release that's impacted or the current API, depending on severity.	
	ACTION ITEM (BELLSOUTH) - Need "fixes" to occur on the current API that's impacted.	



October 17, 2000 CCP Process Improvement Meeting MEETING MINUTES

	MILLING MINUTES
Agenda Items	Discussion
4. RELEASE MANAGEMENT MILESTONES (i.e., documentation,	Woody Roe (Albion-Connect) discussed that there is a big need for standardizing the Release calendar to include the following:
testing)	Dates of Releases
	Rolling Release Schedule
The second secon	Lifecycles identified for each release
	Identify Documentation that is to be associated with each release
	Terrie went on to explain that Business Rules drive the Requirements. Currently, user requirements are reviewed with the CLECs.
	Jill Williamson (AT&T) explained that there is a concern that the CLECs are being told to go through their Account Teams regarding requirements questions, and are not receiving the appropriate responses. She went on to clarify that in her opinion, Account Teams should be contacted for interpretation of current Business Rules, but all future enhancements and associated Business Rules should go through CCP.
	Terrie Hudson (BST) reemphasized that it is BellSouth's goal to provide firm Release milestones which should ensure that documentation is more timely.
	In addition, final documentation will continue to be posted 30 days prior to a Release.
	Terrie summarized by saying that BellSouth is working to provide for an improved structure for Release milestones and should communicate any changes as soon as they are discovered.
	ACTION ITEM (BELLSOUTH) - Provide BST Release Milestones and Communicate deliverables slippage.



October 17, 2000 CCP Process Improvement Meeting

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Agenda Items	Discussion
5. Change the format of the BellSouth Business Rules for Local Ordering (BBR- LO) guide.	Bill Grant (Telcordia) discussed the need for the implementation of a "matrix" format for the BBR-LO, similar to the way it was presented in an earlier Version 9A. Bill provided an example of this format and will send a "soft" copy to Change Control to provide to CLEC community for review. Bill explained that the current structure is not condusive to programming and coding work because it requires too much manual manipulation and translation.
	Kathy Rainwater (BST) expressed her concern that the CLECs may be using the Business Rules for coding and that is not what they are designed for. She explained that the Business Rules document should be used for "How to issue an LSR", not to "code" from.
	Woody Roe (Albion-Connect) asked if there was a way for BellSouth to get the data elements and "matrix format" into a database for the CLECs to be able to manipulate more freely.
	Terrie Hudson (BST) asked if any CLECs would like to share or partner in the cost of a database solution for documentation. Woody Roe (Albion-Connect) stated that he thought he could make a serious case for sharing cost since his company would ultimately save money due to the extra work it is causing them to incur to translate the current document structure.
	Kathy Rainwater (BST) proposed that BellSouth leave the BellSouth Business Rules for Local Ordering (BBR-LO) in its current format, and start providing the User Requirements in the "matrix" format. In addition, Kathy also asked the CLEC's if she should continue to pursue the change request that was submitted to CCP dealing with splitting up the documents into several documents.
	ACTION THEM (BELLSOUTH) - Evaluate documentation needs for provisioning vs. Requirements (Coding). Investigate an electronic solutions for the document, preferably in a "matrix" format.
6. CODING CHANGES—30 days is not sufficient time for CLECs to make coding changes. Need the Business Rules sooner 30 days is sufficient for M&P changes only.	Terrie Hudson (BST) proposed to the CLECs that with the current Release 9.0, BellSouth will provide user requirements as soon as possible, however going forward, BellSouth will investigate providing "draft" requirements 90 days in advance and "Final" requirements 45 days prior to a Release.
	ACTION ITEM (BELLSOUTH) - BellSouth will investigate the possibility of providing "draft" requirements 90 days in advance and "Final" requirements 45 days prior to a Release.



October 17, 2000 CCP Process Improvement Meeting MEETING MINUTES

MEETING MINUTES				
Agenda Items	Discussion			
7. ADDITIONAL TOPICS SUBMITTED BY AT&T.	CR0171 - AT&T's marked up version of the CCP			
	Terrie Hudson (BST) suggested that the CLECs take this "marked up" version of the Process and come to a consensus and present back to the CCP.			
	Jill Williamson (AT&T) will coordinate a meeting with the CLEC participants of Change Control to discuss the document.			
	Tyra Hush (Worldcom) asked that BellSouth be a participant in this CLEC review meeting of the CCP document changes. Valerie Cottingham agreed that CCP would be represented in the review meeting.			
	ACTION ITEM (CLECs) - Review the "marked-up" version of the CCP Process document (provided by AT&T). Come to consensus on changes and present back to CCP.			
	BellSouth's use of the Change Control Process			
	Jill Williamson (AT&T) explained that she would like clarification on BellSouth's view of the CCP process and how can the CLECs be ensured that BellSouth is following the process.			
	Tyra Hush (Worldcom) also agreed with Jill's concern and would like to ask BellSouth to share with the CLECs their internal processes vs. the external "published" process.			
	Jill Williamson (AT&T) stated that the CLECs also need to understand how BellSouth develops their release schedule and what happens if the CLEC disagrees; how can that be resolved.			
	ACTION ITEM (BELLSOUTH) - BellSouth will present its internal vs. external Change Control process at the next CCP Improvement Meeting			
	Process for inclusion of non-OBF standard requests			
	Jill Williamson (AT&T) explained that they need to know what is the procedures in developing the OBF vs. non-OBF standard.			
	Tyra Hush (Worldcom) stated that there are many times when the CLECs do not want to wait till an issue gets OBF approval. There may be instances where an issue should be acted on and may go to OBF later.			
	An additional concern was voiced by Quintessent that Terrie Hudson's organization needs to have a contact to facilitate questions that come up during testing. (i.e, business rules interpretation) Terrie Hudson (BST) will consider ways to improve this process.			
8. OTHER	Terrie Hudson (BST) announced that effective November 1, 2000, the Electronic Interface support group will move under her new organization along with the Testing Group			

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12/13/00



October 17, 2000 CCP Process Improvement Meeting

	MEETING MINUTES			
Agenda Items	Discussion			
SUMMARY OF ACTION ITEMS	 BellSouth - Revision History should be attached to associated Carrier Notification Letters. 			
	 BellSouth - Determine who initiates a change request when identified by a CLEC and Account Team. 			
tan di kananan di Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Ka Kabupatèn Kabupatèn	 BellSouth - There needs to be a "common" definition of defects. 			
	 BellSouth/CLECs - Separate Defects from Expedites. 			
	 BellSouth/CLECs - Segment response time based on the "severity" of the defect. 			
	 BellSouth - Need "fixes" to occur on the current API that's impacted. 			
	 BellSouth - Provide BST Release Milestones and Communicate deliverables slippage. 			
	 BellSouth – Evaluate documentation needs for provisioning vs. Requirements (Coding). Investigate an electronic solution for documentation, preferably in a "matrix" format. 			
	 BellSouth – Investigate the possibility of providing "draft" requirements 90 days in advance and "Final" requirements 45 days prior to a Release. 			
	 BellSouth – BellSouth will present its internal vs. external Change Control process at the next CCP Improvement Meeting. 			
	 CLECs - Review the "marked up" version of the CCP Process document (provided by AT&T). Come to consensus on changes and present back to CCP. 			
NEXT MEETING - November 1, 2000	Location: Crown/Ravinia Hotel, Atlanta Georgia			
9:00 AM EST - NOON - Room to be announced				

Change Control Process Review Meeting October 27, 2000

Attendees:

Anthony Zerillo, Birch Telecom Valerie Cottingham, BellSouth Cheryl Story, BellSouth Tyra Hush, WorldCom Christin Hudson, XO Communications Rae Dupraw, Empower Sherian Lively, Trivergent Jill Williamson, AT&T Jay Bradbury, AT&T Steve Murray, Rhythms Tammi Swinson, Anderson Consulting Sandy Evans, Sprint Peggy Rehm, Nightfire Bill Grant, Telcordia Kate Cooper, EFTIA Mary Conquest, ITC Deltacom

Jill began the meeting by grouping the changes in the redlined document into 8 major categories:

- 1. Defect/Expedite
- 2. Prioritization
- 3. New Interfaces / Retirements
- 4. Escalation
- 5. Dispute Resolution
- 6. Changing the Process
- 7. Testing Environment
- 8. Milestones and Notifications

1. Defects/Expedites

The present definition is:

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.

The CLEC's agreed that that this definition does not adequately cover the scope of a defect. An interface can be working per baseline business requirements and in accord with published documentation and still not provide the CLEC with a usable process. Tyra (WorldCom) suggested some additional language to be incorporated into the current

definition - - or where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data. (insert on page 34)

The CLECs indicated they were in agreement with all of the other changes proposed related to D/E on pages 29-41.

The number in the Develop Workaround box on page 36 for the L interval, should be 4 days, not 3.

Valerie (BellSouth) expressed a concern about the Step 3 item on page 31 "If request is valid, update Change Request status to 'V' for Validated Exception/Expedite and indicate the appropriate Impact Level." The team agreed to drop "and indicate the appropriate Impact Level" as this does not apply in our proposed process - impact levels will only apply to defects

Valerie also requested clarification on page 38 (in Step 3) about the strike of "If training issue, refer to CSM or Account Team." The agreed upon change was "If there is a CLEC training issue, refer the request to CSM or Account Team."

On page 39 (in Step 3) the CLECs suggested an additional Sub-process Activity bullet:

 If a change request is reclassified from feature change to defect (either initially, or after having been reclassified from defect to feature change) it will enter the process at Step 4 and be subject to the interval guidelines stated there.

2. Prioritization

The CLECs indicated they were in agreement with AT&T's proposed changes on pages 42-44, and 25-27. In addition the CLECs suggested that BellSouth could provide more valuable information in advance of the Change Review Meetings that would enhance the CLEC's prioritization voting. These items included:

Order of magnitude sizing estimates
Remaining capacity available in future releases, etc.

These would appear as additional bullets on page 43 and on page 25 (step 4 & 5).

3. New interfaces / Retirements

There was discussion of voting/not-voting on new interfaces when submitted as type 4 (BLS) or type 5 (CLEC) - there will be no voting on a type 4 and there will be voting on the introduction of new interfaces for Type 5 requests. If a CLEC wants to avoid voting on a Type 5, it should submit the request through its Account Team or as a BFR. It was agreed BLS could make new interface introductions at any monthly status meeting.

Regarding retirements, BellSouth agreed to submit them as Type 4 changes.

The CLECs agreed to add a paragraph on the retirement of a "version" of an interface/software. The purpose would be to provide intervals and parameters for the submission and implementation of a new software version.

4. Escalation

The CLECs agreed with the proposed changes in the revised CCP document.

BellSouth wanted a reversion to the original language for the last bullet on page 46 - CLECs agreed.

5. Dispute Resolution

The CLECs indicated agreement with the proposed changes.

6. Changing the Process

The CLECs indicated agreement with the proposed changes.

7. Testing Environment

The CLECs indicated agreement with the proposed changes.

8. Milestones and Notifications

The milestones and notification language was changed to distinguish between documentation changes, changes to existing functionality and upgrade of software versions.

Other

On Page 7, training material examples - Class on how to file an LSR / Web TAFI / Web LENS / Training vs. M&Ps / (BellSouth manages training separately from M&P development)

Add a Testing Processes bullet on page 8; BellSouth to clarify their Testing Support bullet

Change order of bullets 2,1,3 on page 22 - show 45 days for Final Software requirements & specifications (change to 45 days on page 28 also)

The CLECs accepted BellSouth's request for a two-week notice to have SMEs at Monthly Status Meetings (page 24)



CCP Process Improvement Meeting MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY	DATE PREPARED
CCP PROCESS IMPROVEMENT	Steve Hancock - Change Control Team	11/03/00
Crowne Plaza/Ravinia Hotel – Oakwood Room		

Participants/Attendees

COMPANY
BST - NCS/CS
BST - CCP
BST - CCP
BST - CCP
Telcordia
Network One
AT&T
BST - NCS/CS
BST - NCS/CS
SBC-Telecom
Andersen Consulting
FL - PSC
Albion-Connect
Birch Telecom
Quintessent

PARTICIPANT	COMPANY
Rick Woodhouse	KPMG
Graham Watkins	KPMG
Kristen Hudson	хо
Doye Mote	BST - NCS/CS
Stephanie Smith	dset
Yvette Brown	espire
Rae Dupraw	Mpower
Sheriann Lively	Trivergent
Tyra Hush	Worldcom
Judy Novo	Mpower
Steve Murray	Rhythms
Kim Gillette-Hoskins	Quintessent
James Hunter	KPMG
Peggy Rehm	Nightfire
Brian Rutter	KPMG

Meeting Information History

DATE	START TIME	END TIME
11/01/00	9:00 AM EDT	12 NOON EDT
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1		

To better understand the CLEC's needs with regard to the Change Control Process and to address action items from the October 17 meeting.

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CCP Process Improvement Meeting MEETING MINUTES

Agenda Items	Discussion	
. Review Action Items identified by CLECs/BellSouth at the 10-17-00 CCP	ACTION ITEM (BELLSOUTH) - Revision History should be attached to associated Carrier Notification Letters (Documentation).	
Process Improvement meeting.	Status: Currently, BellSouth cannot commit to providing a "complete" revision history attached to the appropriate documentation letter 30 days from implementation.	
	The "revision summary" is the last step completed when constructing the business rules. It would be very difficult if not impossible to accurately capture all of the changes that may ultimately be in the documentation that is changing.	
	BellSouth could, however provide a "global" review of what areas will be impacted in the customer notification letter.	
	Jill Williamson (AT&T) stated that 30 days notice is not enough time for coding changes and it would be helpful if BellSouth could indicate whether there is impact to "coding" in these letters. Kathy Rainwater (BST) responded that this kind of impact is given in subsequent letters outlining the "system/s" impacted. She also reiterated that effective immediately, all documentation changes are being funneled through CCP.	
documentation defect.	- Effective November 1, for new documentation changes, BellSout omer Notification Letter whether the change is related to a system release or a Note: Some customer notification letters that post after 11/1 may not meet suse the notification was enroute.	
	ACTION ITEM (BELLSOUTH) - Determine who initiates a change request when identified by a CLEC and Account Team.	
	Status: a) If an issue is discussed between the CLEC and their Account Team	

issue is determined to be an enhancement or "feature", the Account Team will refer the CLEC to their appropriate CCCM to initiate a Type 5 Change request and send through the Change Control process.

b) If an issue is discussed between the CLEC and their Account Team and the

and BellSouth confirms that the issue is a defect, either in the electronic interface or in documentation, BellSouth will initiate a Type 6 change request

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through the Change Control Process.



CCP Process Improvement Meeting MEETING MINUTES

Agenda Items	Discussion Discussion	
	ACTION ITEM (BELLSOUTH) - There needs to be a "common" definition of defects.	
	Status: During the CLEC Process document review call on 10-27, the CLECs took the existing definition in the CCP Process document and added verbiage to include "where a technical implementation is faulty or maccurate such as to cause incorrect or improperly formatted data".	
	*BellSouth committed to review the "updated" marked up version of the CCP process document and provide a response by the next CCP Process Improvement meeting.	
	ACTION ITEM (BELLSOUTH/CLECs) - Separate Defects from Expedites.	
	Status: Jill Williamson (AT&T) discussed that the CLECs had identified a need for separating defects from expedites. The CLECs have proposed that a new section be created for Exception/Expedites, thus separating an expedited request from a defect.	
	BellSouth expressed concern that the current "proposed" language for an exception is broad and could allow for misuse. BellSouth would ask that the CLECs and BellSouth look at ways to "tighten up" this language.	
	*BellSouth committed to review the "updated" marked up version of the CCP process document and provide a response by the next CCP Process Improvement meeting	
	ACTION ITEM (BELLSOUTH/CLECs) – Segment response time based on the "severity" of the defect.	
	Status: Jill Williamson (AT&T) explained that the CLECs had identified new response time intervals based on the "severity" of the defect in their process review meeting on 10-27.	
	*BellSouth will review this "updated" marked up version and provide a response by the next CCP Process Improvement meeting.	

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CCP Process Improvement Meeting MEETING MINUTES

Agenda items	Discussion
	ACTION ITEM (BELLSOUTH) - Need "fixes" to occur on the current API that's impacted.
	Status: TAG currently has nine (9) versions of the APIs in production supporting three (3) different platforms: Sun Solaris, Windows NT and HP. This means that there are 27 different APIs currently in production. If a defect occurs, the correction is made in the next available release (TCIF 7 and/or 9) because the defect may not be discovered until months after a release has been in production. Currently, TAG is averaging a Release per month. It is impractical and cost prohibitive to go back and propagate a change into potentially nine (9) versions of the APIs, simply because the APIs would expire long before the IT vendor could possibly schedule and incorporate a change.
	ACTION ITEM (BELLSOUTH) - Provide BST Release milestones and communicate deliverables slippage.
	Status: BellSouth is committed to providing milestones for Releases. Milestones were provided at the 10-25 monthly status meeting call with the CLECs.
	For slippages, BellSouth indicated that the owner of the slippage would provide the notification quickly to Change Control. BellSouth is continuing to explore new ways of posting these notifications quicker such as a new "expedited" notice process that is now in place to get customer notifications processed quicker.
	TEM (BELLSOUTH) - If BellSouth discovers that documentation will be slipped, will communicate the customer notification letter appropriately updating the reasons

for the slippage.

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CCP Process Improvement Meeting MEETING MINUTES

Agenda Items	Discussion		
	Tyra Hush (Worldcom) will be providing BellSouth with an example of another ILEC's release milestones for review.		
	Jill Williamson (AT&T) asked BellSouth how far in the future would release information be provided. In addition, AT&T asked if BellSouth would implement quarterly releases. BellSouth responded that it is their goal to offer fewer, more robust releases with more features.		
	BellSouth discussed that their plans are to roll-out new internal processes by the end of November. BellSouth will present these changes to the CLECs at the next CCP meeting. The internal process to be presented will include the flow of CLEC notification. In addition, the internal Release planning will also be changing and the 2001 schedule will be present to the CLECs at the next CCP meeting.		
	ACTION ITEM (BELLSOUTH) – Evaluate documentation needs for provisioning vs. Requirements (Coding). Investigate an electronic solution for documentation, preferably in a "matrix" format.		
	Status: BellSouth will continue pursuing an "electronic solution" for documentation/requirements and will be providing an update at the next CCP meeting. The "matrix" example that was provided by Telcordia will be used as a guide.		
	ACTION ITEM (BELLSOUTH) - Investigate the possibility of providing "draft" requirements 90 days in advance and "final" requirements 45 days prior to a Release.		
	Status: BellSouth is investigating internal process to have requirements provided earlier. An update will be provided at next CCP process improvement meeting.		
	Jill Williamson (AT&T) explained that 90 days for "draft" requirements was not sufficient for major changes and would need 180 days.		
NEW ACTION ITEM (B.	NEW ACTION ITEM (BELLSOUTH) - The CLECs would request that BellSouth provide "draft"		

NEW ACTION ITEM (BELLSOUTH) - The CLECs would request that BellSouth provide "draft" requirements 90 days in advance for minor enhancements to existing versions, and 180 days in advance for major release changes.

NEW ACTION ITEM (BELLSOUTH/CLECs) – BellSouth will communicate the time intervals that will need to occur for CLEC Test Environment requirements to be received by the CLECs in a timely manner, Albion/Connect will provide summary of concerns and recommendations of timelines as it relates to the CLEC Test environment.

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CCP Process Improvement Meeting

·	MEETING MINUT		
Agenda items		Discussion	
		ACTION ITEM (BELLSOUTH) – BellSouth to present its internal vs. external change control process after a change request is "prioritized".	
		Status: BellSouth is currently looking at ways to streamline its internal processes and will be presenting its recommendations at the next CCP process improvement meeting.	
		BellSouth would also request that the CLECs provide more detail on their change requests which will greatly reduce clarification and help facilitate the turnaround of these requests.	
		BellSouth also illustrated to the CLECs that the current environment suggests that depending on the system impacted, dictates how BellSouth can implement change requests. Discussions are ongoing between BellSouth and their IT vendors to improve the delivery of changes concurrently	
	the Monthly Status Med	ELLSOUTH) - BellSouth will begin discussing all "New" Change Requests in etings. BellSouth SME's will be available during the discussion and the Change Request will need to discuss their request with the team.	
		ACTION ITEM (CLECs) - Review the "marked up" version of the CCP process document (provided by AT&T). Come to consensus on changes and present back to CCP.	
		Status: Jill Williamson (AT&T) facilitated a meeting on 10-27 with the CLECs to review this "marked up" version and reach a consensus on its recommendation to BellSouth. BellSouth will review these changes and will provide its response by the next scheduled CCP process improvement meeting.	
	NEW ACTION ITEM (A. process document and to CLECs.	T&T) - Jill Williamson will provide updated "marked up" version of the CCP he minutes from the 10-27 meeting to Change Control for distribution to the	
	NEW ACTION ITEM (BELLSOUTH) - BellSouth will provide a report of internal changes that have positive impact and improve performance for CLECs, but do not require coding. These changes improve "flow-through" in BellSouth and would require no vote by the CLECs.		
		Jill Williamson (AT&T) explained that BellSouth internal releases could negatively impact the CLECs and the CLECs may want to test before the release goes in.	
2. Additional disc	ussion topics	CR0171 - AT&T's marked up version of the CCP Process document. (Addressed in earlier action item)	

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CCP Process Improvement Meeting MEETING MINUTES

Jill Williamson (Discussion	
		PROCESS FOR APPEALING BELLSOUTH'S RELEASE SCHEDULE – Jill Williamson (AT&T) stated that if the CLECs understand the size and the scope of releases, they will be glad to work with BellSouth on "re-arranging" changes.	
		PROCESS FOR INCLUSION OF NON-OBF STANDARD REQUESTS – Jill Williamson (AT&T) stressed the need to find a way to push "non-OBF" approved requests through the change control process. BellSouth suggested that the issue be discussed in a monthly status meeting with the appropriate SME to review. This will allow both parties to talk through the issue and decide collectively whether it can be worked.	
	NEW ACTION ITEM (B. evaluate a non-OBF sta	BELLSOUTH) - BellSouth will propose a process on how we would collectively	
3. NEW ISSUES		Jill Williamson (AT&T) discussed that a new process needs to be implemented that will allow the CLECs to vote on rejecting a change request before it is prioritized for implementation at a Change Review Meeting. This would give the CLECs the opportunity to say that they do not want an issue implemented when it negatively impacts them.	
	CLECs to vote on rejects	AT&T) - Jill Williamson will add verbiage around creating a new process for ting a change request before it is prioritized for implementation. This will be up" version of the Change Control process document.	
SUMMARY OF ACTION ITEMS		BellSouth – Effective November 1, for documentation changes, BellSouth will state on the Customer Notification Letter whether the change is related to a system release or a documentation defect. Note: Some customer notification letters that post after 11/1 may not meet this commitment because the notification was enroute.	
		 BellSouth – If BellSouth discovers that documentation will be slipped, Change Control will communicate the customer notification letter appropriately updating the reasons for the slippage. 	
		 BellSouth - BellSouth to provide "draft" requirements 90 days in advance for minor enhancements to existing versions, and 180 days in advance for major release changes. 	

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CCP Process Improvement Meeting MEETING MINUTES

INICETING MINOTE		
Agenda Items	Discussion	
	BellSouth – BellSouth will communicate the time intervals that will need to occur for CLEC Test Environment requirements to be received by the CLECs in a timely manner.	
	 Albion/Connect - To provide summary of concerns and recommendations of timelines as it relates to the CLEC Test Environment. 	
	 BellSouth - BellSouth will begin discussing all "New" change requests in the monthly status meetings. BellSouth SMEs will be available during the discussion and the originator of each new request will need to discuss their request with the team. 	
	 AT&T - AT&T will provide update "marked up" version of the CCP process document and the minutes from the 10-27 meeting to Change Control for distribution to the CLECs. 	
	 BellSouth - BellSouth will provide a report of internal changes that have a positive impact and improve performance for CLECs, but do not require coding. These changes improve "flow-through" in BellSouth and would require no vote by the CLECs. 	
	BellSouth - BellSouth will propose a process on how they would collectively evaluate a non-OBF standard request.	
	 AT&T - AT&T will add verbiage around creating a new process for CLECs to vote on rejecting a change request before it is prioritized for implementation. This will be added to the "marked up" version of the Change Control process document. 	
VEXT MEETING - December 7, 2000	Location: BellSouth Conference Center	
	1:00 - 4:00 PM EST - Room to be announced	

11/08/00



CHANGE CONTROL PROCESS

CCP8_23.DOC VERSION 2.0

AUGUST 23 OCTOBER 27, 2000

DECEMBER 5, 2000

Issued: 10/27/00 9/15/00 8/23/00 12/05/00

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.

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

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	The EICCP Documentation has been modified to incorporate:
			- 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	The CCP Documentation has been modified to incorporate:
			- 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

			Introduction of new interfaces
			- 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	The CCP Documentation has been modified to incorporate:
			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	Section 1	- Updated CCP web site address
		Section 8	- Updated Escalation Contacts for Types 2-6
		Section 11	- Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1	- Added "testing" under process changes
		Section 2	- Clarification provided in "Change Review

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	T	Double to the state of the stat
		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
	Section 8	- Added Type 6 escalation turnaround time
	5554511 5	- 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	- Added BellSouth Versioning Policy

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		All	Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover	- Removed "Interim" from cover.
		Section 3	Updated Type 6 definition to incorporate new defect and expedited feature definitions.
		Section 5	- 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.
		Section 10	- Added Internet Web sites for EDI and TAG Testing Guidelines
		Section 11-Terms & Definitions	Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts.
		Appendix A	Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels.
		All	- Referenced the handling of expedites and expedite notification where appropriate.

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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)(BellSouth cannot support)
- Defects/Expedites

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

The scope of the Change Control Process does not include the following which are handled through existing BellSouth processes:

- 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)(Agree to remove)

- Issue Resolution/Questions (i.e. questions associated with interface functionality, interpreting documentation)(Agree to remove)
- Coordination of test agreements will continue to be supported by the Account Team(Agree to accept)
- 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. (Agree to accept)
- Change Requests of this nature will be handled through existing BellSouth processes.(Revised and accepted above)

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"

Version 2.0

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:

<u>Change Review Participants.</u> 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.

<u>CLEC Change Control Manager (CCCM).</u> 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

Version 2.0

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. (Does not apply to Expedited Feature process)

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. (Does not apply to Expedited Feature process)

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

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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. (BellSouth Agrees)

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. (BellSouth Agrees)

Type 6- CLEC Impacting Defects/Expedites.(Agree to Remove)

A defect is Aa(agree to add)ny 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 validated changes defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

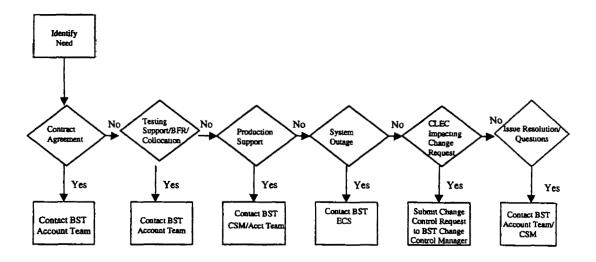
An expedited feature is the inability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. (Agree to remove)

The CLEC and/or BellSouth may initiate <u>defectthese types of</u> (Agree to remove) 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.

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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.



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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:

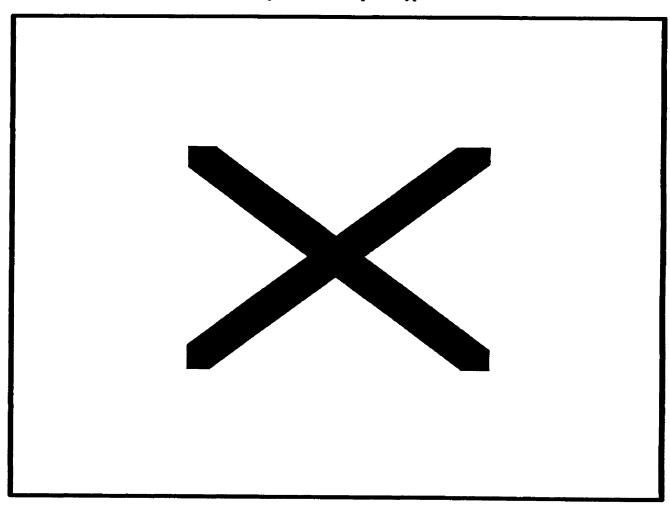


Figure 4-1. Change Control Process Flow

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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.

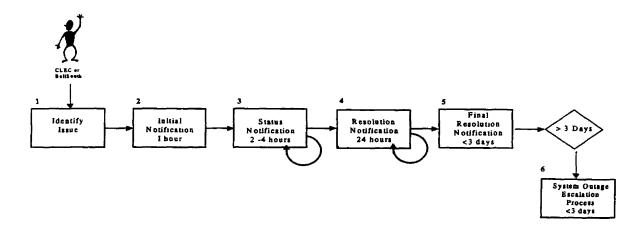


Figure: 4-2. Type 1 Process Flow

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

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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

(F)				
Step	Accountability	<u>Sub-processes</u>	Inputs and	Cycle Time
San Contract		Activities	Outputs	基本工作基本
1	CCCM ECS	IDENTIFY ISSUE: 1. 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). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. 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. 4. ECS will provide the CLEC with a trouble ticket number and record and track the outage. 4. ECS will provide the CLEC with a	INPUTS: Issue Characteristics Call to ECS Helpdesk OUTPUTS: Recorded Outage	N/A
2	ECS	INITIAL NOTIFICATION: 1. 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. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an	INPUTS: Recorded Outage OUTPUTS: Industry Notification posted on Web E-mail to CLECs participating in Change Control	I Hour If System Outage is not resolved within 20 minutes, a notification

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Step	Accountability	Sub-processes* Activities	Inputs and 2 Outputs	Cycle Time
		as needed basis. 3. ECS will continue to work towards the resolution of the problem 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.		will be sent to CLECs via e- mail and posted to the web.
3	ECS	STATUS NOTIFICATION: (ITERATIVE) 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	 INPUTS: Industry Notification posted on Web OUTPUTS: Status Notification posted on Web Resolution information 	2-4 hour intervals
4	ECS CCCM	RESOLUTION NOTIFICATION: (ITERATIVE) 1. The resolution notification is posted to the Web. 2. 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. 3. 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. 4. When the final resolution has been	 INPUTS: Status Notification posted on Web Resolution information OUTPUTS: Resolution Information posted on Web Final Resolution Information Information 	24 hours after reporting outage

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Step	Accountability.	Sub-processes & grant for the Activities	Inputs and Courties	Cycle Time	
		created, proceed to Step 5 "Final Resolution Notification".			
5	ECS	FINAL RESOLUTION NOTIFICATION: 1. The final resolution notification is posted on the Web.	INPUTS: • Final Resolution Information OUTPUTS: • Final Resolution Notification	< 3 days	
6	CCCM ECS	 ESCALATION Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. Refer to the Type 1 - Escalation Process documented in Section 8. 	INPUTS: Information or concern relating to a Type 1 - Systems Outage OUTPUTS: 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.

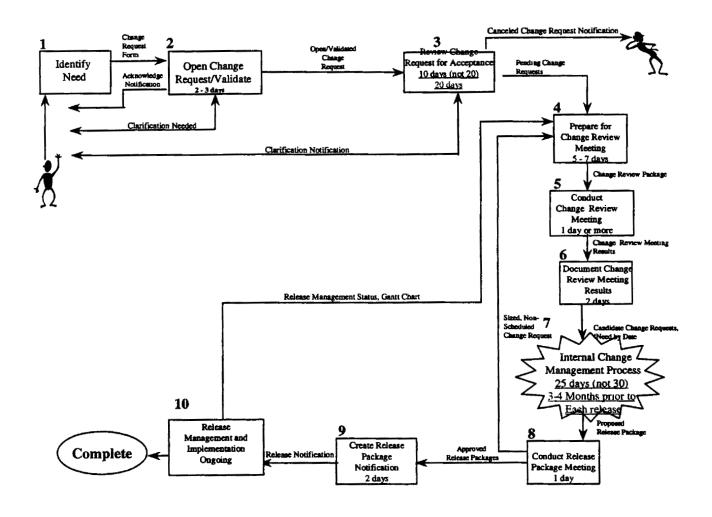


Figure 4-3. Change Control Process Flow

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 data.
- 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 Documentation changes that do not impact
 <u>CLEC software, for including</u> business rules changes, will be provided to <u>CLECs</u> 30 calendar
 days or more in advance of implementation date.
- Draft user requirements for software releases will be provided to CLECs NLT 90 calendar days in advance of the release implementation date.
- Final user requirements for software releases will be provided to CLECs NLT 45 calendar days in advance of the release implementation date.
- Notification for the implementation of a new TCIF map will be provided NLT 180 calendar
 days in advance of the release implementation date. BellSouth will begin working jointly
 with the CLECs in the development of the User Requirements for a new TCIF map NLT 180
 calendar days in advance of the release implementation date.
- Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs NLT 120 calendar days in advance of the release implementation date.
- Final user requirements for the implementation of a new TCIF map will be provided to CLECs NLT 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts. BellSouth will distribute the user requirements at least once a month until one (1) month beyond implementation of the new TCIF map.
- All additions and changes to BellSouth business rule documentation will be provided to CLECs NLT 30 calendar days in advance of the release implementation date.

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□CLEC notification of documentation updates (non system changes) will be posted 5 (five) business days in advance of documentation posting date. (Agree to Remove)

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

Standard or 12	The Company of the contraction of the		International Control of the Control	The same of the same of the same of
Step	Accountability.		Anputs and	Cycle Time
		Activities	Outputs	
1	CCCM BCCM	IDENTIFY NEED 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	INPUTS: Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) OUTPUTS: Completed Change Request Form with related documentation	V/A
2	ВССМ	OPEN CHANGE REOUEST/VALIDATE CHANGE REOUEST FOR COMPLETENESS 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-	INPUTS: Completed Change Request Form with related documentation Change Request Form Checklist Change Request Clarification Response OUTPUTS: New Change Request Acknowledgment Notification Validated Change Request Clarification Notification Industry Notification via e-	2-3 Bus Days Clarification times would be in addition to cycle time.

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time	
		4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. CLEC or BellSouth Originator If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	mail and web posting		
3	ВССМ	REVIEW CHANGE REQUEST FOR ACCEPTANCE 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue-or-training issue-or-training issue (Agree to remove) forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • 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. NOTE: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth feels that a CLEC initiated thange request should not be accepted because of cost, industry direction or because it is believed not technically leasible to implement, BellSouth will open in agenda item on the next monthly status	INPUTS: New Change Request Validated Change Request Clarification Notification (if required) OUTPUTS: Pending Change Request Clarification Notification (if required) Cancellation Notification (if required) CR status updated on web	20-10 Bus Days 20 Bus Days	

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Change Control Process <u>CLEC Red Line Version</u> / <u>BellSouth Response</u>

Version 2.0 Ccp8_23.doc Step Accountability. Sub-process Inputs and Cycle Time Activities Outputs 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. If BellSouth determines that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is considered 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. BellSouth shall consider all possible options for accommodating the request. **OBF** Issues All issues that are being actively discussed at OBF or are on the agenda to be discussed will be deferred. If the issue is not active and will not be considered within the next six (6) months. BellSouth will address the 1.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. (Agree to Remove) 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. (Agree to Remove) NOTE: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to narticinate in uncoming Monthly Status

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Meeting.		
4	BCCM CCCM	PREPARE FOR CHANGE REVIEW MEETING NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. BCCM	INPUTS: Pending Change Request Notifications Project Release Status (Step 10) Change Request Log OUTPUTS:	5-7 Bus Days
		 Prepare an agenda. Make meeting preparations. Update Change Request Log with current status for new and existing Change Requests. Prepare and post Change Request Log to web. 	 Change Request Log CLEC Draft Priority List Size and scope on each Pending change request 	
		5. Provide size and scope information on each pending change request to CLECs.(Agree to accept) CCCM		
		 Analyze Pending Change Requests. Determine priorities for change requests and establish "Desired/Want" dates. Create draft Priority List to prepare for Change Review meeting. 		
5	вссм	CONDUCT CHANGE REVIEW MEETING	INPUTS: ■ Change Request Log ■ CLEC Draft Priority List	1 Bus Day [or as needed
	CCCM	Monthly Status Meetings 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects/expedites) at monthly status	 Desired/Want Dates Impact analysis Size and scope on each Pending change request 	pased on volume)
		meeting. 3. Review current Release Management statuses. 4. Review issues and action items and assign owners. (Agree to Accept) 5. Present new change requests submitted since previous Monthly Status Meeting. (Agree to Accept)	OUTPUTS: Meeting minutes Updated Change Request Log Candidate Change Request List Issues and Actions Items (if required)	Meeting Day

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Step	Accountability	Stib-processes 3.8 ±5. Activities 4.2.	P. Inputs and Ontputs	Cycle Time
		Prioritization Meetings (held as needed based on published release schedule) (held quarterly in March, June, September and December) (Agree to accept) 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. BellSouth presents size and scope of each change request and potential release package combinations. BellSouth presents size and scope of each change request. 4. Discuss Impacts. 5. Prioritize Change Requests. 6. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Request Log to 'CRC' for Change Request Log to 'CRC' for Candidate Request List, as appropriate. 8. Review issues and action items and assign owners.		
6	вссм	DOCUMENT CHANGE REVIEW MEETING RESULTS 1. Prepare and distribute outputs from Step 5.	INPUTS: Change Request Log Final Candidate Request List OUTPUTS: Updated Change Request Log Web posting of meeting output	2 Bus Days
7	BCCM CCCM	INTERNAL CHANGE MANAGEMENT PROCESS 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities only (Agree to remove) to the Candidate Change Requests that meet the criteria established by the Internal Change	INPUTS: Candidate Change Request List with agreed upon 'Need by Dates' Change Request Log OUTPUTS: BellSouth's Proposed	30-25 Bus Days 3-4 months prior to each major release (Interval will

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Step	Accountability	Sub-processes Activities	Inputs and Gutputs	Cycle Tin
		Management Process. (Agree to Remove) This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. 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. (Agree to Add: for the next release' - Delete: each future release) 3. All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process. (Remove - BellSouth cannot support)	Release Package(two scenarios) CLEC analysis.(Agree to add)	vary as a result of lesign, construction and testing efforts.)
8	BCCM CCCM	CONDUCT RELEASE PACKAGE MEETING 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process. 4. (BELLSOUTH recommends the following two (2) scenarios: a)	INPUTS: BellSouth's Proposed Release Package (two scenarios). BellSouth's Release Schedule Change Request Log CLEC analysis(Agree to add) OUTPUTS:	. 1 Bus Day
		Non-scheduled Change Requests will need to be re-prioritized at the next Change Review Meeting along with new pending requests to accommodate changes in the Industry's business requirements. (Return to Step 4) or b) Prioritize only the new "Pending CR's" since the last Change Review Meeting and incorporate rankings into the overall prioritization list. CLECs, based on group consensus, may request re-ranking of all non-scheduled CR's.) 5. Based on BST/CLEC consensus	 Approved Release Package Updated Change Request Log Meeting Minutes Scheduled Change Requests Non-Scheduled Change Requests (Return to Step 4 (BellSouth cannot support) Date for initial Release Management Project Meeting for newly established releases.(BellSouth: for 	

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Step	Accountability	Sub-processes Activities state	Inputs and Outputs	Cycle Time
		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. Based on BST/CLEC consensus determine which scenario should be implemented. Create the Approved Release Package and schedule. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting for newly established releases. (for the next release) 8. All Change Requests that are in the approved scheduled release (s)(Remove) will be changed to "S" status for "Scheduled".	next release – Delete: for newly established releases)	
9	ВССМ	CREATE RELEASE PACKAGE NOTIFICATION 1. Develop and distribute Release Notification Package via web.	INPUTS: • Approved Release Package (s)(Remove) OUTPUTS: • Release Package Notification	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	RELEASE MANAGEMENT AND IMPLEMENTATION 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 (Agree to accept) will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. • For new features or changes to existing functionality, Ddraft	INPUTS: Approved Release Package Notification OUTPUTS: 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	Ongoing

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Step Accountability	Sub-processes 10	Inputs and Outputs	Cycle Time
	Specifications and Requirements will be provided NLT 90 days in advance of Implementation. Draft User Requirements for software release will be provided to the CLECs NLT 90 calendar days in advance of the release implementation date. For new features or changes to existing functionality. Pfinal Specifications and Requirements will be provided NLT 3045 days in advance of Implementation. Final User Requirements for software releases will be provided to the CLECs NLT 45 days in advance of the release implementation date. 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 Notification for the implementation of a new TCIF map will be provided NLT 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map NLT 180 calendar days in advance of the release implementation date. Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs NLT 120 calendar days in advance of the release implementation date. Final User Requirements for the implementation date.	Implemented Change Request Draft User Requirements Final User Requirements Documentation Changes	

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Step	Accountability.	Sub-processes Activities	Inputs and 1	Cycle Time
		ACIVILE	Outputs **	Section of the sectio
		map will be provided to CLECs		
		NLT 60 calendar days in		
		advance of the release	į	:
		implementation date. To		
		accommodate changes that may		
		be necessary as a result of		
		design, construction, and		
		testing efforts, BellSouth will		
		distribute the user requirements		
		at least once a month until one		
		(1) month beyond the		
		implementation of the new		
		TCIF map.		
		• Implementation will occur NLT		
		6 months from the date of the		
		prioritization of each change		
		request. (BellSouth cannot		
		support)		' <u>, </u>
		4. BellSouth Documentation changes.		11
		including business rule changes will		1
		be provided.(Agree to add)		
		 All such changes will be 		
		provided NLT 30 days in		
		advance of Implementation.		
		 All additions and changes to 		·
		BellSouth business rule		
	ì	documentation will be provided		
		to CLECs NLT 30 calendar		i
		days in advance of the release		
		implementation date.		11
		 Implementation will occur NLT] [
		90 days from the date of the]
		prioritization of each change		11
		request.(BellSouth cannot		
		support)		•
		Once a Change Request is		į
		implemented in a release, the status		
		will be changed to "I" for Change)
		Implemented.		

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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.

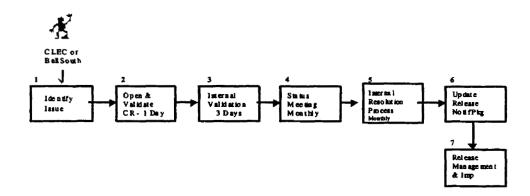


Figure 4-4. Type 2-5 Exception/Expedited Feature Process

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

				Table 1 and 1
Step	Accountability	Sub-processes are Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	IDENTIFY NEED 1. Identify Exception/Expedite. 2. Originator and CCCM or BCCM complete the standardized Change Request Form indicating that it is an Expedite Candidate. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments should include the following, if available: PON OCN Specific scenario Interface(s) affected Error message (if applicable) Release or API version (if applicable) Release Torm and related information via e-mail to BellSouth	INPUTS: Type 2-5 Change Request Reclassified Type 6 Change Request Exception/Expedited Request OUTPUTS: Completed Change Request Form (with related documentation if necessary)	<u>N/A</u>
<u>2</u>	<u>BCCM</u>	Change Management Team. OPEN & VALIDATE EXPEDITE FORM FOR COMPLETENESS 1. Log Exception/Expedite in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC.	INPUTS: • Completed Change Request Form (with related documentation if necessary) OUTPUTS:	1 Bus Day

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		2-3. Establish CR status ('N' for New Exception/Expedite). 3-4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist. 4-5. Verify specifications and related information exists. 5-6. Send Clarification Notification via email to the originator if needed. 6-7. Update CR Status to 'PC' for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.	New Exception/Expedite Acknowledgment Notification Clarification Notification (if required)	
<u>3</u>	BCCM	INTERNAL VALIDATION 1. Validate that it is an	INPUTS: New Exception/Expedite Validated Exception/Expedite Exception/Expedite notification to CLEC community via e-mail and web posting Clarification Notification (if required) Cancellation Notification (if required)	3 Bus Days

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Step	Accountability	Activities	Anputs and Ontputs	Cycle Time
		feedback. The Change Request will exit the exception/expedite process flow and enter Types 2-5 normal process flow at Step 3.		
		NOTE: See Section 11.0 Terms and Definitions - Expedite Status for valid status codes and descriptions.		
		Exception/Expedite notification will be provided to CLEC community via e-mail and web posting.		
<u>4</u>	BCCM CCP Members	MONTHLY STATUS MEETING 1. Provide status of Excpetion/Expedite. 2. Solicit CLEC/ BST input. 3. Reach consensus as to disposition. 4. Update Exception/Expedite information as needed.	INPUTS: Exceptions/Expedites Received Change Request Log Exception/Expedite Analysis	Monthly or when status changes, whichever occurs first.
			OUTPUTS: Updated status Updated Change Request Log Meeting minutes	
<u>5</u>	BCCM	1. Schedule and evaluate Exceptions/Expedites based on capacity and business impacts to the CLECs and BellSouth. 2. Provide status updates to the CLEC community via email as the status changes until the exception/expedite is implemented.	INPUTS: • CLEC/ BST input OUTPUTS: • Excpetions/Expedites Release Schedule	Monthly or when status changes, whichever occurs first.
		Exceptions will be implemented in the release determined by the consensus reached in Step 4.		
		Expedites will be implemented in the current, next release, or point release, best effort, as determined by the consensus of the CCP Members at the Monthly Status Review Meeting.		

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<u>Step</u>	Accountability	Sub-processes Activities	52 Inputs and 40.	Evcle Time
<u>6</u>	<u>BCCM</u>	UPDATE RELEASE PACKAGE NOTIFICATION 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". Note: The release notification will be	INPUTS: Exception/Expedite Feature Information OUTPUTS: Updated Release Package Notification Scheduled Change Request	Based on release constraints for expedites (may be less than 30 days).
		published in a timely manner, based on the release constraints associated with the expedite.		
7	<u>BCCM</u>	RELEASE MANAGEMENT AND IMPLEMENTATION The following release management activities will pertain to Type 2-5 Exception/Expedited Feature changes: 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 2. BellSouth business requirements will be presented to CLECs for expedited features (if applicable). If needed, changes will be incorporated and requirements re-baselined. 3. Once an Exception/Expedited Feature Change is implemented in a release, the status will be changed to "I" for Change Implemented.	INPUTS: Approved Release Package Notification OUTPUTS: Project Release Status Implementation Date Implemented Change Request	Ongoing

PART 3 - EXPEDITED FEATURE PROCESS

An Expedited Feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories:

- A defect that has been re-classified as a feature where the CLEC has determined should be expedited due to impact
- An enhancement to an existing product or service where the CLEC has determined should be expedited due to impact

Re-classified Defects

When a defect is re-classifed as a standard feature, the CLEC will be notified by Change Control in the standard defect validation. The CLEC will have the ability to ask BellSouth to expedite the reclassified standard feature by updating the Change request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 process using agreed upon intervals. The rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

Enhancement to an existing product or service

A CLEC/BellSouth will also have the ability to submit a Type 4-5 change request as an expedited feature request for an enhancement to an existing product or service where the functionality does not currently exist in BellSouth's offered products and services. The rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.

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• The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

Figure 4.4 provides the process flow for the expedited feature process.

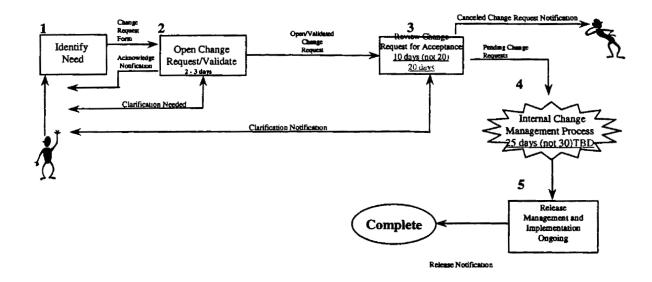


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

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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 Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and Attachment A-1A, Item 22. 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	INPUTS: Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) OUTPUTS: Completed Change Request Form with related documentation	N/A
2	BCCM	OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. CLEC or BellSouth Originator If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	 INPUTS: Completed Change Request Form with related documentation Change Request Form Checklist Change Request Clarification Response OUTPUTS: New Change Request Acknowledgment Notification Validated Change Request Clarification Notification Industry Notification via email and web posting 	l Bus Day Clarification times would be in addition to cycle time.

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Step Accountability 3 BCCM	Sub-processes Activities REVIEW CHANGE REQUEST FOR ACCEPTANCE	Inputs and Coutputs 1	Cycle Time
3 BCCM		INDITS	1
	 Review Change Request and related information for content. Change Request reviewed for impacted area (i.e., system, manual process, documentation) and adverse impacts. Determine status of request: If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. 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. If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow. Step 4. NOTE: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth determines that a CLEC initiated expedited change request should not be accepted because of cost, industry direction or because it is considered 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. BellSouth shall consider all possible options for accommodating the request. NOTE: If requested, appropriate SME will participate in the Monthly Status Meeting to 	New Change Request Validated Change Request Clarification Notification (if required) OUTPUTS: Validated Expedited Change Request Clarification Notification (if required) Cancellation Notification (if required) CR status updated on web	20 Bus Days

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Step	Accountability	Sub-processes Activities #	Inputs and Outputs	Cycle Time
		address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	BCCM CCCM	INTERNAL CHANGE MANAGEMENT PROCESS 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	 INPUTS: Change Request Log OUTPUTS: Release Date for Expedited Feature 	30-25 (Still under discussion)
5	BCCM (Project Managers from each participating company)	RELEASE MANAGEMENT AND IMPLEMENTATION 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 applicable. If needed. changes will be incorporated and requirements re-baselined. 4. BellSouth Documentation changes, including business rules changes will be provided. 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	OUTPUTS: • Project Release Status • Implementation Date	Ongoing

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5.0 DEFECT/EMERGENCY CHANGE/EXPEDITE NOTIFICATION PROCESS

5.0 DEFECT PROCESS (Emergency Changes are already addressed as Type 1)

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.

A CLEC/BST identified defect will enter this process through the Change Management Team as a Type 6 Change Request. If the defect 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. (SPLIT into two bullets)
- Is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs
- Is impacting a CLEC's ability to exchange transactions with BellSouth
- or where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data. -REMOVE (BellSouth considers this example a standard feature at which point would follow the Types 2-5 process flow, however if the issue falls under the definition of an "expedited feature", it would follow that process).

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

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

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. AGREE TO REMOVE AND MOVE TO NEW SECTION.

Type 6Defect Change Requests will have three Impact Levels:

High Impact

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

Expedited features will be treated as High Impact. AGREE TO REMOVE

Medium Impact

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

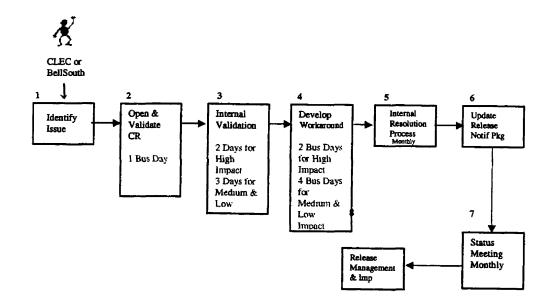
Low Impact

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. REMOVE – BellSouth can not support.

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



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

[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

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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 (Agree to remove), 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

	Table 5-1. Type o Detail Floress Flow					
Step	Accountability	Sub-processes Activities	Inputs and Outputs **	Cycle Time		
1	CCCM	IDENTIFY NEED 1. Identify Defect/Expedite.(REMOVED) 2-5. Originator and CCCM or BCCM	INPUTS: Type 6 Change Request	N/A		
	ВССМ	should complete the standardized Change Request Form indicating that it is a Type 6. 36. Include description of business need and details of business impact. 47. Attach related requirements and specification documents. These attachments should (must) include the following, if available (REMOVE): PON OCN Specific Scenario Interface(s) affected Error message (if applicable) Release or API version (if applicable) Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth	OUTPUTS: Completed Change Request Form (with related documentation if necessary)			
2	ВССМ	Change Management Team. OPEN & VALIDATE	INPUTS:	4 hours for		
2	DCCIVI	DEFECT/EXPEDITE FORM FOR COMPLETENESS 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect) 4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist.	 Completed Change Request Form (with related documentation if necessary) OUTPUTS: New Defect/Expedite Acknowledgment Notification Clarification Notification (if required) 	High Impact 1 Bus Day for all Impact Types 1 Bus Day for Medium and Low Impact		

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		 Verify specifications and related information exists. Send Clarification Notification via email to the originator if needed. Update CR status to "PC" for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response. 		
3	ВССМ	INTERNAL VALIDATION 1.4. Validate that it is a defect/expedite. 2.5. Perform internal defect/expedite analysis. 3.6. Determine status of request: 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. If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to 'C'.	INPUTS: New Defect/Expedite OUTPUTS: Validated Defect/Expedite Defect/Expedite notification to CLEC community via email and web posting Clarification Notification (if required) Cancellation Notification (if required)	1 Bus Day for High and Medium Impact 2 Bus Days for High Impact 3 Bus Days Medium and Low Impact
		 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 resolve the issue. 		

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		DRAF I		
Step	Accountability	Sub-processes Activities	Inputs and pose in Outputs	Cycle Time
		 If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. 		
	i	 Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. 		1
		Note: High Impact Expedites will skip Step 4 (Develop Workaround) and be scheduled for the current; next release, or point release, best effort. (REMOVE)	:	
		 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(REMOVE) process flow and enter Types 2-5 process flow (enter at Step 3).		
		NOTE: See Section 9.0 Terms and Definitions – Defect/Expedite(REMOVE) Status for valid status codes and descriptions.		1
		Defect/Expedite(REMOVE) notification will be provided to CLEC community via email and web posting.		I
4	ВССМ	DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE) 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via email to originating CLEC and to the	NPUTS: Validated Defect Clarification Notification (if required) DUTPUTS: Workaround (if applicable)	1 Bus Days 1 Bus Day for High and Medium Impact
		CLEC community via e-mail and web	Clarification Notification (if	2 Bus Days for

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cýcle Time		
		posting-(ADDED) 4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. Defect workaround notification will be provided to CLEC community via e mail and web posting. (REMOVE) If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will	required) Cancellation Notification (if required) E-mail and web posting of workaround	High Impact 4 Bus Days for Low Impact 4 Bus Days for Medium and Low Impact		
		be provided to CLEC community via e-mail and web posting.				
5	BCCM	MONTHLY STATUS MEETING 1. Provide status of Defect/Expedite. 2. Solicit CLEC/ BST input. 3.5. Update Defect/Expedite information as needed. (BELLSOUTH AGREES TO MOVE THIS TO STEP 7)	INPUTS: □Defects/Expedites Received □Change Request Log □Defect/Expedite Analysis □Workaround (if applicable) OUTPUTS: □Updated status □Updated Change Request Log • Meeting minutes	Monthly or when status changes, whichever occurs-first.		
<u>5</u> 6	вссм	INTERNAL RESOLUTION PROCESS 1-3. Schedule and evaluate Defects/Expedites(REMOVED) based on capacity and business impacts to the CLECs and BellSouth.(ADDED) 2-4. Provide status updates to the CLEC community via email as the status changes until the defect/expedite(REMOVED) is scheduledimplemented.(ADDED) NOTE: Validated defects (High Impact) will be implemented within a 4 25 business day range, best effort. (REMOVED)	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.		

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Step	Accountability	Sub-processes at a Activities	Inputs and Outputs	Cycle Time		
		Expedites (High Impact) will be implemented in the current, next release, or point release, best effort. (REMOVED)		High Impact Defects will be implemented within a 4-25 best effort. Low Impact defects will be implemented within a 4 - 20 business day range, best effort. (REMOVE)		
67	ВССМ	UPDATE RELEASE PACKAGE NOTIFICATION 1-3. Update and distribute release notification package via web. 2-4. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". Note: The release notification will be published in a timely manner, based on the release constraints associated with the defect/expedite.	 INPUTS: Defect/Expedite(Remove) Feature Information OUTPUTS: Updated Release Package Notification Scheduled Change Request 	Based on release constraints for defects/expedites(Removed) (may be less than 30 days).		

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

Step	Accountability	Sub-processes Activities	Inputs and	Cycle Time
7	<u>BCCM</u>	MONTHLY STATUS MEETING 5-6. Provide status of Defect. 6-7. Solicit CLEC/ BST input. 7-8. Update Defect/Expedite information as needed. (BELLSOUTH AGREES TO THIS STEP)	INPUTS: Defects/Expedites Received Change Request Log Defect/Expedite Analysis Workaround (if applicable) OUTPUTS:	Monthly or when status changes, whichever occurs first.
			Updated status Updated Change Request Log Meeting minutes	
8	ВССМ	RELEASE MANAGEMENT AND IMPLEMENTATION The following release management activities will pertain to Type 6 changes: 4. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings.	INPUTS: Approved Release Package Notification OUTPUTS: Project Release Status Implementation Date Implemented Change Request	Ongoing
		3-5. Once a defect/expedite(REMOVED) is implemented in a release, the status will be changed to "I" for Change Implemented.		1

6.0 CHANGE REVIEW <u>- PRIORITIZATION - RELEASE PACKAGE</u> <u>DEVELOPMENT AND APPROVAL</u> (Agree to Add)

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 (preorder, 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.] All additions and changes to BellSouth business rule documentation will be provided to CLECs NLT 30 calendar days in advance of the release implementation date. 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 (Agree to remove) occur in March, June, September and December (Agree to quarterly meetings) 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

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- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's estimate of the size and scope of each Change Request(Agree to accept)
- Schedule of releases and capacity in each (BellSouth can only support providing the 'schedule of the releases')
- 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.
- CLECs may choose to "defer" on voting on change requests that may negatively
 impact its business. A rating of "defer" will not be counted in the overall rating.
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and (Do not delete BellSouth prefers that Manual CR's follow the same prioritization process as other CR's) Documentation changes(Agree) 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 (Agree to remove)
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

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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	CLEG: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.

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 three (3) to four (4) months prior to each major release.

- 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 accepts)
- BellSouth will develop several variations of release packages to include all of the prioritized requests.
- BellSouth will develop and present two scenarios for the next release. Based on group consensus at the Release Package Meeting, the determination will be made as to which scenario should be implemented. BST/CLEC consensus will be used to create the Approved Release Package and schedule.

- All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.
- (BellSouth to propose two (2) scenarios) 1) Unscheduled change requests will need to be re-prioritized at the next Change Review Meeting along with new pending requests to accommodate changes in the Industry's business requirements or 2) Prioritize only the new "Pending" CR's since the last Change Review Meeting. Rankings will be incorporated into the overall prioritization list. CLECs, based on group consensus, may request re-ranking of all non-scheduled CR's.

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. (BellSouth cannot support)

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.

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. 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. As new interfaces are deployed, they will be added to the scope of this document, as appropriate, based on the use by the CLEC 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(Remove) 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

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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.

Retirement of Versions

When software versions are retired, BellSouth will give the CLECs a 120 day notification.

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8.0 ESCALATION PROCESS

<u>Guidelines</u>

- 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. (Excludes Expedites)
- For Type 6 <u>High and Medium Impact</u>(See next bullet) issues, the escalation process is agreed to allow BellSouth a <u>threeone</u>-day turnaround to provide a status for each cycle of escalation.
- For Type 6 High Impact issues, the escalation process is agreed to allow BellSouth a two

 (2) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium
 and Low Impact issues, the escalation process is agreed to allow BellSouth a five (5) 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. (See next bullet)
- For Types 4-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.

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 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.

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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	Don Tighe Manager - EC Support Group Interconnection Operations	404-532-2233	1-800-946-4646 PIN 1440050	Don.Tighe@bridge.bells outh.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bell south.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bells outh.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.

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- 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

<u>Type 2-5 Changes</u>(BellSouth agrees) 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 High Impact Changes: Within 2 business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Type 6 Medium and Low Impact Changes: Within five (5) business days 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.

Type 4-5 Expedite Changes: Within three (3) business days of receipt (2 from acknowledgment), 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	Name and Title	Office Number	Email Address
Level	V-late Carthallan		
1st Level	Valerie Cottingham	}	
	Sales Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level			
	Terrie Hudson	770-936-3740	Terrie.Hudson@bridge.bellsouth.com
	Director		
	(for Systems Issues)		
	Tow Y offens	404-927-7828	Joy.A.Lofton@bridge.bellsouth.com
	Joy Lofton Director	404-927-7626	
	(for Business		
	Rules/Operations		
	Issues)		
3rd Level	Doug McDougal	404-927-7505	Doug.Mcdougal@bridge.bellsouth.com
	Senior Director		
•	(for Systems Issues)		
	Dee Freeman-Butler	404-927-3545	Dee.Freeman2@bridge.bellsouth.com
	Senior Director	404-727-5545	Dec.1 rechianz @ bridge.bensoudi.com
	(for Business		
	Rules/Operations		
	Issues)		

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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.

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

 Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.

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 Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

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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.

(BellSouth continuing to Review)

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.

NOTE: BellSouth would prefer to re-evaluate this section after the CLEC Test Environment is implemented in 1st Qtr. 2001.

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"

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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	Negotiation	ıs

- 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.

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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

\mathbf{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.

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- 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 4-5 Expedited Feature Change. Any Type 4-5 change that either BellSouth or a CLEC submits for expeditious 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. (Agree to remove)

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. (agree to remove)
- 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. Any non-type 1 change where a BellSouth interface used by a CLEC which is in production and is not working accordance with the BellSouth baseline business requirements, is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs, or is impacting a CLEC's ability to exchange transactions with BellSouth.

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.
 - CT = Training. Requested change already exists, or CLEC training issue.
- 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).

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 - 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. (Remove – these changes are already addressed as Type 1 System Outages)

Exception Change. An exception change request may involve the extension of the normal intervals for the implementation of a Type 2-5 change. (BellSouth supports as an escalation)

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.

Expedited Feature. An expedited feature is the inability for CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a defect that has been re-classified

as a feature where the CLEC has determined should be expedited due to impact and 2) an enhancement to an existing product or service where the CLEC has determined should be expedited due to 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.

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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.

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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.



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

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).

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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.

Issued:-08/23/00 9/15/00 12/05/00

APPENDIX C -ADDITIONAL DOCUMENTS

See Attached Documents

80

Issued: 08/23/00 9/15/00 12/05/00

Version 2.0

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.

Issued: 08/23/00 9/15/00 12/05/00

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----Original Message----

From: smurray@rhythms.net [mailto:smurray@rhythms.net]

Sent: Wednesday, August 23, 2000 4:51 PM

To: Williamson, Jill R, NCAM

Subject: FW: Bell South OSS Issues

Jill;

Sorry I had to drop off the call this morning, I understand that there was a vote take to approve the interim plan. Seems strange that was not mentioned in the Agenda.

Someone participating on the call this morning asked that I share this with you:

Docket No. 000731-TP JMB-R13 Page 1 of 11

----Original Message----From: smurray@rhythms.net [mailto:smurray@rhythms.net] Sent: Monday, August 28, 2000 10:02 AM To: Change.Control@bridge.bellsouth.com; Annette.Cook@espire.net; apatel3@telcordia.com; BellSouth@quintessent.net; best2@surfsouth.com; brian.powers@onepointcom.com; brutter@kpmg.com; bszafran@covad.com; c and m@bellsouth.net; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cecilia.ortiz@adelphiacom.com; cflanigan@uslec.com; Chapmanwe@cepb.com; charrison@mpowercom.com; cheryl@eatel.com; chrisg@pvtel.net; christine.shelton@cc.gte.com; colleen.e.sponseller@wcom.com; CPolizzotti@northpoint.net; Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com; daddymax@netbci.com; dana.braun@adelphiacom.com; Debra.Pasquale@btitele.com; DElliott@connectsouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com; donnam@networktelephone.net; donnas@intetech.com; dpetry@ix.netcom.com; drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.qte.com; epadfield@nextlink.com; ESingleton@eztalktelephone.com; evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net; generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com; jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc; JDuffey@PSC.STATE.FL.US; jeffrey@cellularsouth.com; JG6837@ctmail.snet.com; jhoze@kmctelecom.com; jmclau@kmctelecom.com; JMMaxwell@Intermedia.com; jnovo@mpowercom.com; Williamson, Jill R, Wilson Jr, Jack T (Tom), BGM; julie.jacobs@adelphiacom.com; Katherine. Hudler@espire.net; kcooper@eftia.com; kelley.dunne@onepointcom.com; khudson@nextlink.com; Kimberly.O.Williams@MCI.com; kmarshall@telstar.org; kmiller@northpointcom.com; kschwart@covad.com; lchase@covad.com; lhall@floridadigital.net; lisa@annox.com; Lminasola@MediaOne.com; Lorraine.Watson@wcom.com; mark@annox.com; Mark.E.Turner@MCI.com; marybethkeane@kpmg.com; matt@albionconnect.com; mconquest@itcdeltacom.com; mer@networkwcs.com; microsun@bellsouth.net; mmclaughlin@dset.com; msaxon@Trivergent.com; mt7210@momail.sbc.com; mubeen@nightfire.com; ngiugno@kpmg.com; Nicole.Moorman@adelphiacom.com; Pam Green@dmr.com; PBarker@aol.com; PBohn@MediaOne.com; Pkinghorn@eztalktelephone.com; prehm@nightfire.com; prichardson@Trivergent.com; rbennett@floridadigital.net; rbuffa@interloop.net; RH3074@momail.sbc.com; rhonda.calvert@adelphiacom.com; rlthompson@nextlink.com; robert@alternativephone.com; rszczepanski@kpmg.com; sandra.k.evans@mail.sprint.com; Sandrajf@intetech.com; sbowling@caprock.com; shane@eatel.com; sharon.arnett@mail.sprint.com; sharon.russo@btitele.com; sjenning@nowcommunications.com; smason@interloop.net; smoore@Trivergent.com; smurray@rhythms.net; snole@kpmq.com; srober@kmctelecom.com; SStapler@itcdeltacom.com; steve.taff@allegiancetelecom.com; stuartw@networkonecom.com; talleylinda@mindspring.com; Tanya.Finney@espire.net; TAYLORJG@LCI.COM; tbrooks@mantiss.com; timk@networktelephone.net; TLA@MAGICNET.NET; tmontemayer@mantiss.com; Todd@CSII.net; Tselane.Robertson@alltel.com; tyra.colbert@wcom.com; usfloridaoss@kpmg.com; Williamsal@cepb.com; wmknapek@Intermedia.com; wolfsbrg@cris.com; woody@albionconnect.com; Yvette.Brown@espire.net; rbreckin@telcordiacom.att.com; msykes@telcordiacom.att.com; billg@telcordiacom.att.com;

svc-gate@telcordiacom.att.com; karengrim@mailsprintcom.att.com;
Tyra.Hush@wcom.com; trsmith@Trivergent.com; chaynes@Trivergent.com;
ssmith@dset.com; David.Genest@dsl.net; sangelo@bellsouth.net;
sbrown@covad.com; gulfcoast@dotstar.net; Mark.Mecca@dsl.net;
Connie@albionconnect.com; tonya.d.woods@mail.sprint.com;
MiThorne@birch.com; ASamson@birch.com
Subject: RE: 8-23-00 Meeting Minutes - Monthly Status Call

I wish to strongly object to imprompto vote that was taken at the end of the 8/23 meeting. Unfortunately I had to drop to attend another meeting, but clearly had there been mention of a vote on the agenda, I would have stayed on.

I don't feel that this was handled in a appropriate manner. It could have and should have been made clear on the agenda that we would be a vote would be taken. I for one believe that the vote should be cast out and another call be scheduled immediately to address the issues and conerns of the community.

Steve Murray Rhythms

```
----Original Message----
From: smurray@rhythms.net [mailto:smurray@rhythms.net]
Sent: Tuesday, August 29, 2000 11:48 AM
To: Change.Control@bridge.bellsouth.com; Annette.Cook@espire.net;
apatel3@telcordia.com; BellSouth@quintessent.net; best2@surfsouth.com;
brian.powers@onepointcom.com; brutter@kpmg.com; bszafran@covad.com;
c and m@bellsouth.net; cassandrap@networktelephone.net;
Catherine.Gray@alltel.com; cecilia.ortiz@adelphiacom.com;
cflanigan@uslec.com; Chapmanwe@cepb.com; charrison@mpowercom.com;
cheryl@eatel.com; chrisg@pvtel.net; christine.shelton@cc.gte.com;
colleen.e.sponseller@wcom.com; CPolizzotti@northpoint.net;
Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com;
daddymax@netbci.com; dana.braun@adelphiacom.com;
Debra.Pasquale@btitele.com; DElliott@connectsouth.com;
desiree@communitytelephone.com; dfoust@deltacom.com;
dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com;
donnam@networktelephone.net; donnas@intetech.com; dpetry@ix.netcom.com;
drodrigu@accessone.cc; Dwight.Scrivener@wcom.com;
ed.ramsden@cc.gte.com;
epadfield@nextlink.com; ESingleton@eztalktelephone.com;
evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net;
generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com;
jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc;
JDuffey@PSC.STATE.FL.US; jeffrey@cellularsouth.com;
JG6837@ctmail.snet.com; jhoze@kmctelecom.com; jmclau@kmctelecom.com;
JMMaxwell@Intermedia.com; jnovo@mpowercom.com; Williamson, Jill R,
Wilson Jr, Jack T (Tom), BGM; julie.jacobs@adelphiacom.com;
Katherine. Hudler@espire.net; kcooper@eftia.com;
kelley.dunne@onepointcom.com; khudson@nextlink.com;
Kimberly.O.Williams@MCI.com; kmarshall@telstar.org;
kmiller@northpointcom.com; kschwart@covad.com; lchase@covad.com;
lhall@floridadigital.net; lisa@annox.com; Lminasola@MediaOne.com;
Lorraine.Watson@wcom.com; mark@annox.com; Mark.E.Turner@MCI.com;
marybethkeane@kpmg.com; matt@albionconnect.com;
mconquest@itcdeltacom.com; mer@networkwcs.com; microsun@bellsouth.net;
mmclaughlin@dset.com; msaxon@Trivergent.com; mt7210@momail.sbc.com;
mubeen@nightfire.com; ngiugno@kpmg.com; Nicole.Moorman@adelphiacom.com;
Pam Green@dmr.com; PBarker@aol.com; PBohn@MediaOne.com;
Pkinghorn@eztalktelephone.com; prehm@nightfire.com;
prichardson@Trivergent.com; rbennett@floridadigital.net;
rbuffa@interloop.net; RH3074@momail.sbc.com;
rhonda.calvert@adelphiacom.com; rlthompson@nextlink.com;
robert@alternativephone.com; rszczepanski@kpmg.com;
sandra.k.evans@mail.sprint.com; Sandrajf@intetech.com;
sbowling@caprock.com; shane@eatel.com; sharon.arnett@mail.sprint.com;
sharon.russo@btitele.com; sjenning@nowcommunications.com;
smason@interloop.net; smoore@Trivergent.com; snole@kpmg.com;
srober@kmctelecom.com; SStapler@itcdeltacom.com;
steve.taff@allegiancetelecom.com; stuartw@networkonecom.com;
talleylinda@mindspring.com; Tanya.Finney@espire.net; TAYLORJG@LCI.COM;
tbrooks@mantiss.com; timk@networktelephone.net; TLA@MAGICNET.NET;
tmontemayer@mantiss.com; Todd@CSII.net; Tselane.Robertson@alltel.com;
tyra.colbert@wcom.com; usfloridaoss@kpmg.com; Williamsal@cepb.com;
wmknapek@Intermedia.com; wolfsbrg@cris.com; woody@albionconnect.com;
Yvette.Brown@espire.net; rbreckin@telcordiacom.att.com;
msykes@telcordiacom.att.com; billg@telcordiacom.att.com;
```

svc-gate@telcordiacom.att.com; karengrim@mailsprintcom.att.com;
Tyra.Hush@wcom.com; trsmith@Trivergent.com; chaynes@Trivergent.com;
ssmith@dset.com; David.Genest@dsl.net; sangelo@bellsouth.net;
sbrown@covad.com; gulfcoast@dotstar.net; Mark.Mecca@dsl.net;
Connie@albionconnect.com; tonya.d.woods@mail.sprint.com;
MiThorne@birch.com; ASamson@birch.com
Subject: RE: 8-23-00 Meeting Minutes - Monthly Status Call

Hello, is anyone there. I have not recieved a response from the Change Control group on this message I sent last week. I have received several calls from other CLEC indicating that they did not understand the vote and felt pressured into voting.

What are you going to do??

St€	eve	Mu	rı	ay
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I wish to strongly object to imprompto vote that was taken at the end of the 8/23 meeting. Unfortunately I had to drop to attend another meeting, but clearly had there been mention of a vote on the agenda, I would have stayed on.

I don't feel that this was handled in a appropriate manner. It could have and should have been made clear on the agenda that we would be a vote would be taken. I for one believe that the vote should be cast out and another call be scheduled immediately to address the issues and conerns of the community.

Steve Murray Rhythms

```
----Original Message-----
From: smurray@rhythms.net [mailto:smurray@rhythms.net]
Sent: Tuesday, August 29, 2000 3:54 PM
To: Change.Control@bridge.bellsouth.com; Annette.Cook@espire.net;
apatel3@telcordia.com; BellSouth@quintessent.net; best2@surfsouth.com;
brian.powers@onepointcom.com; brutter@kpmg.com; bszafran@covad.com;
c and m@bellsouth.net; cassandrap@networktelephone.net;
Catherine.Gray@alltel.com; cecilia.ortiz@adelphiacom.com;
cflaniqan@uslec.com; Chapmanwe@cepb.com; charrison@mpowercom.com;
cheryl@eatel.com; chrisg@pvtel.net; christine.shelton@cc.gte.com;
colleen.e.sponseller@wcom.com; CPolizzotti@northpoint.net;
Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com;
daddymax@netbci.com; dana.braun@adelphiacom.com;
Debra.Pasquale@btitele.com; DElliott@connectsouth.com;
desiree@communitytelephone.com; dfoust@deltacom.com;
dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com;
donnam@networktelephone.net; donnas@intetech.com; dpetry@ix.netcom.com;
drodrigu@accessone.cc; Dwight.Scrivener@wcom.com;
ed.ramsden@cc.gte.com;
epadfield@nextlink.com; ESingleton@eztalktelephone.com;
evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net;
generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com;
jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc;
JDuffey@PSC.STATE.FL.US; jeffrey@cellularsouth.com;
JG6837@ctmail.snet.com; jhoze@kmctelecom.com; jmclau@kmctelecom.com;
JMMaxwell@Intermedia.com; jnovo@mpowercom.com; Williamson, Jill R,
Wilson Jr, Jack T (Tom), BGM; julie.jacobs@adelphiacom.com;
Katherine.Hudler@espire.net; kcooper@eftia.com;
kelley.dunne@onepointcom.com; khudson@nextlink.com;
Kimberly.O.Williams@MCI.com; kmarshall@telstar.org;
kmiller@northpointcom.com; kschwart@covad.com; lchase@covad.com;
lhall@floridadigital.net; lisa@annox.com; Lminasola@MediaOne.com;
Lorraine.Watson@wcom.com; mark@annox.com; Mark.E.Turner@MCI.com;
marybethkeane@kpmg.com; matt@albionconnect.com;
mconquest@itcdeltacom.com; mer@networkwcs.com; microsun@bellsouth.net;
mmclaughlin@dset.com; msaxon@Trivergent.com; mt7210@momail.sbc.com;
mubeen@nightfire.com; ngiugno@kpmg.com; Nicole.Moorman@adelphiacom.com;
Pam Green@dmr.com; PBarker@aol.com; PBohn@MediaOne.com;
Pkinghorn@eztalktelephone.com; prehm@nightfire.com;
prichardson@Trivergent.com; rbennett@floridadigital.net;
rbuffa@interloop.net; RH3074@momail.sbc.com;
rhonda.calvert@adelphiacom.com; rlthompson@nextlink.com;
robert@alternativephone.com; rszczepanski@kpmg.com;
sandra.k.evans@mail.sprint.com; Sandrajf@intetech.com;
sbowling@caprock.com; shane@eatel.com; sharon.arnett@mail.sprint.com;
sharon.russo@btitele.com; sjenning@nowcommunications.com;
smason@interloop.net; smoore@Trivergent.com; smurray@rhythms.net;
snole@kpmg.com; srober@kmctelecom.com; SStapler@itcdeltacom.com;
steve.taff@allegiancetelecom.com; stuartw@networkonecom.com;
talleylinda@mindspring.com; Tanya.Finney@espire.net; TAYLORJG@LCI.COM;
tbrooks@mantiss.com; timk@networktelephone.net; TLA@MAGICNET.NET;
tmontemayer@mantiss.com; Todd@CSII.net; Tselane.Robertson@alltel.com;
tyra.colbert@wcom.com; usfloridaoss@kpmg.com; Williamsal@cepb.com;
wmknapek@Intermedia.com; wolfsbrg@cris.com; woody@albionconnect.com;
Yvette.Brown@espire.net; rbreckin@telcordiacom.att.com;
msykes@telcordiacom.att.com; billg@telcordiacom.att.com;
```

svc-gate@telcordiacom.att.com; karengrim@mailsprintcom.att.com;
Tyra.Hush@wcom.com; trsmith@Trivergent.com; chaynes@Trivergent.com;
ssmith@dset.com; David.Genest@dsl.net; sangelo@bellsouth.net;
sbrown@covad.com; gulfcoast@dotstar.net; Mark.Mecca@dsl.net;
Connie@albionconnect.com; tonya.d.woods@mail.sprint.com;
MiThorne@birch.com; ASamson@birch.com
Cc: rwilliams@rhythms.net; jedavis@rhythms.net;
elizabeth@technologylaw.com
Subject: RE: 8-23-00 Meeting Minutes - Monthly Status Call

To All:

Let me share with you Valerie's response to my objection of the "vote" that was taken to baseline the Interim CCP process/documentation at the end of the 8/23 meeting.

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Steve,

The vote to make the Interim CCP the new baseline was not impromptu. We understand the outstanding issues and concerns of the CLEC community.

Making the Interim CCP the new baseline does not affect our efforts to address your needs. It gives us our starting point so that we can jointly move forward.

The Defect/Expedite Process is still in DRAFT mode while we address specific concerns regarding it.

Since the Change Review Meeting in June, I have indicated that I would ask for the CLECs to consider the Interim document our new baseline. This is a working document, which means that it will change, as appropriate, to accommodate the CLECs' and BellSouth's needs.

My original intent was to address this during the July meeting, but due to time, I stated that I would delay that vote until our August meeting. The July meeting lasted almost three (3) hours since we reviewed many changes to the Interim CCP document.

I have always made it very clear that BellSouth wanted to baseline the process. We continue to incorporate many of your suggestions and will continue to do so as we move forward.

Sincerely,

Valerie	М.	Cottingham

Again my concerns are:

6 Yes votes from a group of over 90 people on the mailing list, makes for neither a consesus nor a majority. I feel as I was deprived of a vote because I had no idea there would be a vote.

If in fact there was to be a vote, why was it not mentioned on the agenda? Would there not possibly been more votes if the vote was announced ahead of schedule. Valerie says it was not impromtu. If it was unannounced and/or unexpected, what was it.

Several members expressed confusion over what they were voting on. Plus several members had dropped off the call, not knowing a vote was coming.

Valerie said that the vote was delayed due to lack of time. I suggest that it was because of the vocal opposition to even having a vote because so many of us had issues with the processes.

As BellSouth and the CLEC community move into an EDI enviornment, do we really want to baseline and use a process that allows our requests sit for over a year? (examples from the CCR Log: New CCR dated 3/1/99, a Pending CCR dated 8/12/99, or a Defect dated 4/17).

Additionally, the Expedited Feature Process we've all asked for is still not complete. In it's present form it can leave waiting for answer for up to 30 days.

The rhetorical assurances that "We understand the outstanding issues and concerns of the CLEC community" while trying to maneuver us into processes that don't meet our needs.

I suggest that each of us consider the current performance of the CCP process and decide whether we are satisfied with the results. If not let BellSouth know, otherwise it's Business As Usual.

If BellSouth wants a fair vote, they will offer the question to each of us in writing with a voting option or at the face to face meeting on September 27.

Think about this:

Why does BellSouth want us to endorse the interim document as a new baseline if they say it's only a "working doucment" anyhow?

Would it have anything to do with litigation potential? If it's only "a starting point so we can jointly move forward" where have we been before now?

```
----Original Message----
From: Tyra Hush [mailto:Tyra.Hush@wcom.com]
Sent: Wednesday, August 30, 2000 3:15 PM
To: Change.Control@bridge.bellsouth.com; Annette.Cook@espire.net;
apatel3@telcordia.com; BellSouth@quintessent.net; best2@surfsouth.com;
brian.powers@OnePointCom.com; brutter@kpmg.com; bszafran@covad.com;
c and m@bellsouth.net; cassandrap@networktelephone.net;
Catherine.Gray@alltel.com; cecilia.ortiz@adelphiacom.com;
cflanigan@uslec.com; Chapmanwe@cepb.com; charrison@mpowercom.com;
cheryl@eatel.com; chrisg@pvtel.net; christine.shelton@cc.gte.com;
colleen.e.sponseller@wcom.com; CPolizzotti@northpoint.net;
Craig@exceleron.com; Craig.B.Douglas@wcom.com; CSteele@nuitele.com;
daddymax@netbci.com; dana.braun@adelphiacom.com;
Debra.Pasquale@btitele.com; DElliott@connectsouth.com;
desiree@communitytelephone.com; dfoust@deltacom.com;
dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com;
donnam@networktelephone.net; donnas@intetech.com; dpetry@ix.netcom.com;
drodrigu@accessone.cc; Dwight.Scrivener@wcom.com;
ed.ramsden@cc.qte.com;
epadfield@nextlink.com; ESingleton@eztalktelephone.com;
evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net;
generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com;
jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc;
JDuffey@PSC.STATE.FL.US; jeffrey@cellularsouth.com;
JG6837@ctmail.snet.com; jhoze@kmctelecom.com; jmclau@kmctelecom.com;
JMMaxwell@Intermedia.com; jnovo@mpowercom.com; Williamson, Jill R,
Wilson Jr, Jack T (Tom), BGM; julie.jacobs@adelphiacom.com;
Katherine. Hudler@espire.net; kcooper@eftia.com;
kelley.dunne@OnePointCom.com; khudson@nextlink.com;
Kimberly.O.Williams@wcom.com; kmarshall@telstar.org;
kmiller@northpointcom.com; kschwart@covad.com; lchase@covad.com;
lhall@floridadigital.net; lisa@annox.com; Lminasola@MediaOne.com;
Lorraine.Watson@wcom.com; mark@annox.com; Mark.E.Turner@wcom.com;
marybethkeane@kpmg.com; matt@albionconnect.com;
mconquest@itcdeltacom.com; mer@networkwcs.com; microsun@bellsouth.net;
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Cc: patricia.b.woods@wcom.com; Lorraine Watson (E-mail); Dwight
Scrivener (E-mail)
Subject: RE: BellSouth Response to Steve Murray on CCP Voting Concerns

BellSouth Change Control,

MCI WorldCom is requesting that our vote of "Yes" to baseline the Interim Change Control Process be withdrawn. Our representative in attendance on the 8/23 status call was not aware that she was unable to represent WorldCom in such a vote. As you are well aware, I Tyra Hush am MCI WorldCom's primary contact and Patricia B. Woods is the secondary contact, therefore we are the only representatives to render such a vote.

As previously stressed, MCI WorldCom does not agree to baseline the document until key issues such as the Defect/Expedited process is clearly defined and complete, change request process intervals are shortened, and time intervals are established for outstanding change request.

Sincerely,

Tyra Hush MCI WorldCom

----Original Message----From: List.Manager@bridge.bellsouth.com [mailto:List.Manager@bridge.bellsouth.com] On Behalf Of Change.Control@bridge.bellsouth.com Sent: Tuesday, August 29, 2000 4:10 PM Annette.Cook@espire.net; apatel3@telcordia.com; BellSouth@quintessent.net; best2@surfsouth.com; brian.powers@OnePointCom.com; brutter@kpmg.com; bszafran@covad.com; c and m@bellsouth.net; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cecilia.ortiz@adelphiacom.com; cflanigan@uslec.com; Chapmanwe@cepb.com; charrison@mpowercom.com; cheryl@eatel.com; chrisg@pvtel.net; christine.shelton@cc.gte.com; colleen.e.sponseller@wcom.com; CPolizzotti@northpoint.net; Craig@exceleron.com; Craig.B.Douglas@wcom.com; CSteele@nuitele.com; daddymax@netbci.com; dana.braun@adelphiacom.com; Debra.Pasquale@btitele.com; DElliott@connectsouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com; donnam@networktelephone.net; donnas@intetech.com; dpetry@ix.netcom.com; drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.gte.com; epadfield@nextlink.com; ESingleton@eztalktelephone.com; evdoty@nextlink.com; frankb@cellonems.com: Gary@CSII.net; generalg@cris.com; george@accesscomm.com;

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            ID: BellSouth Response to Steve Murray on CCP Voting
Concerns
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Change Control Process Monthly Status Meeting Minutes

DATE: August 23, 2000

MEETING: Monthly Status Call

PURPOSE: Review Status of Pending/Approved Change Requests

ATTENDEES

Lorraine Watson - WorldCom	Donna Graham – Mantiss	Valerie Cottingham, BST
Sandy Evans, Sprint	Malinda Saxon – Trivergent	Steve Hancock, BST
Jill Williamson - AT&T	Dave Genest - dsl.net	Cheryl Storey - BST
Woody Roe, Albion Connect	Mark Mecca – dsl.net	John Duffey, FL PSC
Steve Murray, Rhythms	Mike McLaughlin - dset	Brian Rutter, KPMG
Shamone Stapler, ITC- Deltacom	John Duffey, FL PSC	James Hunter, KPMG
Mubeen Saifullah, Nightfire	Brian Rutter, KPMG	Rick Woodhouse - KPMG
Phyllis Burt - Quintessent	Kim Gillette – Quintessent	·

AGENDA

Agenda

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

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Opening

The BCCM opened the meeting and covered the items we were to accomplish on this conference call:

- 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 Interim Change Control Process
- New Issues/Action Items

Regulatory Mandates

CR0059 - Change TN Reservation Period to 45 days (pre-ordering functionality)

FCC Docket # 99200

Order # FCC00-104

CR0059 was not included in Release 7.0. The deadline for compliance has been extended until December 2000. Target date for implementation is 4Q00.

Outstanding Action Items

Outstanding Action Items from 7/26/00 Monthly Status call:

1. Owner: BellSouth (OPEN)

Finalize Expedited Feature Process

Status: To be discussed during today's meeting.

2. Owner: AT&T & WorldCom (OPEN)

Advise Change Control on how they would like to pursue UNE via ASR21 change request.

Status: AT&T (Jill) advised to leave this change request open.

3. Owner: BellSouth (CLOSED)

CR0040 - Order Tracking Request - provide additional clarification on LNP limitations.

Status: Information provided to originator on 8/7/00 for review and feedback. AT&T (Jill) advised responses were okay. No additional questions as this time.

4. Owner: BellSouth (CLOSED)

Update Release Schedule on CCP Web site and information on the standardization of the releases. *Status*: 2000 Release Schedule provided to CLEC community on 8/16/00 and posted to the CCP web site. BST normally has 2 to 3 major releases a year (January, June-July and November timeframes). Point releases are scheduled as needed.

5. Owner: BellSouth (CLOSED)

Provide requirements to CLECs for CR0092 - DFDT & CHC Defect Request

Status: BellSouth provided business rules to CLECs on 8/1/00.

6. Owner: BellSouth (OPEN)

Investigate if CLECs can submit a list to the LCSC re: 411 drops.

Status: CLECs can call the LCSC and ask to speak with Manager to make arrangements. Jill (AT&T) to provide examples of LNP w/listing. Jill questioned if there will be a standard process for 411 drops. BST to investigate further.

7. Owner: BellSouth (CLOSED)

Address the inclusion of other BST ordering documentation in the 30-day or more advance notice (i.e., EDI Specifications).

Status: EDJ Specifications and Pre-ordering business rules will be included in the 30-day advance notice. Currently the TAG API Reference Guide cannot commit to the 30-day advance notice. The TAG API Reference Guide provides the technical specs for building the code. The TAG API reference guide is generated as the code is created. If last minute changes are made, the changes must also be made in the guide.

8. Owner: BellSouth (CLOSED)

Retirement of Interfaces. CLECs request that Change Control provide the notification to give them the opportunity to provide input.

Status: BellSouth will have all retirement of interface notification come through Change Control. Version 1.6 of Interim CCP has been updated.

9. Owner: BellSouth (CLOSED)

Create a "Cancelled" category on the CCP web site to archive cancelled requests.

Status: Category has been added and appropriate cancelled change requests have been moved.

10. Owner: BellSouth (OPEN)

Investigate search/sort capability for CCP web site.

Status: Currently BellSouth is investigating the options available for the CCP site and will be tentatively targeting this enhancement for the end of September.

11. Owner: CLEC Community (OPEN)

Review CR0095 - ECTA Attribute Validation and provide feedback to Change Control. Status: AT&T (Jill) advised this is working fine as it is today. Will leave CR open for any additional comments from other CLECs.

New Change Requests (Types 2-5)

ORD030200 001 - UNE via ASR21

Status: AT&T (Jill) advised to leave this CR open.

ORD032700 001 - Post-FOC Clarification

Status: Conference call held 8/10/00 with originator and BST SME to discuss options. It was determined that the pending pre-order CR TAG0812990001 (provide CFA information, NC/NCI codes) is a possible solution. If CR TAG0812990001 cannot be included with Release 8.0, Change Control will provide a date on when it can be worked.

CR0012 - TAFI Functionality via ECTA Interface

Status: AT&T advised to leave this request open to continue discussions with BellSouth.

CR0018 – USOC Segmentation

Status: AT&T (Jill) advised this request could be closed. They may re-open at a later time.

CR0033 - EDI Multiple ReqTyp Enhancement

CCP Monthly Status Meeting

Status: Provided BST response on 8/4/00 to originator for review and feedback. Multiple REQTYPEs (AB/BB) cannot be supported via EDI due to system restrictions as well as OBF Guidelines. However, we understand that this is being allowed today on manually submitted LSRs. This is a training issue that will be addressed with the centers. We will also work jointly with the Account Teams and CSMs in educating the CLECs that for requests types similar to the example submitted (one LSR with a Loop w/NP and a Loop Service page) it would benefit CLECs. as well as the centers, in processing LSRS if this was sent as a REQTYPE BB with a Loops w/Number Portability Page.

CR0053 - CLEC Ordering Guide - LSOG 4

Status: Pending Clarification for recommendations on improvements to the BellSouth Business Rules-Local Ordering guide.

CR0065 - Add LENS 6.3 Tutorial

Status: Originator advised this CR could be placed on "HOLD" until future updates to LENS are completed. BST provided additional information for consideration to originator on 7-19-00 regarding a new LENS Web-based course. CLECs should be able to register for this course in the September timeframe.

CR0087 - "C" Order Process for UNE-P

Status: CR is currently being reviewed for acceptance regarding changing the internal process for the migration of Retail or Resale to UNE-P.

CR0091 - Add DFDT to the FOC

Status: BST response provided to originator 8/9/00. Currently in escalation process. BST is reconsidering response.

CR0093 - Electronic Change Notifications

Status: Being reviewed for acceptance.

CR0095 - ECTA - Attribute Validation

Status: Open for CLEC comments on whether this is a feature they would like to see implemented.

CR0096 - LENS Enhancement- Add New Listings

Status: Being reviewed for acceptance

CR0104 – LENS Large Account Inquiry Status: Being reviewed for acceptance.

CR0105 - Drop the RES ID to Requirement for xDSL Order

Status: BST response provided to originator on 8/14/00 for review.

CR0106 - Delay Sunset of LSOG2 xDSL Ordering via Fax

Status: BST response provided to originator on 7/26/00 for review. Originator appeal on 7/26/00. BST response to appeal on 8/11/00. LSOG2 sunset period has been extended until 10/01/00.

CR0121 - Discrepancies in BellSouth Guidelines - CG-LSOR-002

Status: Reclassified as a Type 6 defect change request.

CR0127 - Provide Pending Service Order for CSR via TAG

Status: Being reviewed for acceptance.

CR0131 – Split Billing Requests

Status: Being reviewed for acceptance.

CR0132 - Fielded Completion Notifications

Status: Being reviewed for acceptance.

CR0133 - Migration of UNE-P Notifications

Status: Being reviewed for acceptance.

Docket No. 000731-TP JMB-R14 Page 4 of 14 CR0134 - TN Reservation Display of Switch CLLI

Status: Being reviewed for acceptance.

CR0135 - Merging of Accounts

Status: Being reviewed for acceptance.

CR0137 - Flow-Through Change Request

Status: Being reviewed for acceptance.

CR0138 - Fielded Completion Notice.

Status: Originator advised this CR could be canceled - duplicate of CR0132.

CR0139 - TAG API Clarification to Cross Reference Pre-Order Business Rules

Status: Being reviewed for acceptance

CR0140 - Update the Due Date Calculation Intervals in TAG to Match Products/Services Interval

(Resale)

Status: Being reviewed for acceptance

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Pending Change Requests

The following change requests were prioritized at the June 28, 2000 Change Review Meeting and are in "Candidate Request (RC)" status.

- EDI0812990003 411 Drops
- EDI0812990004 One LSR to change the main account number on "J" REQTYP
- EDI0812990005 Handling of Remaining Lines when main account is migrating
- TAG0812990001- Provide CFA and NC/NCI via TAG Pre-Order
- EDI081290007 Lift LEAN/LEATN restrictions
- TAG0812990003- Parsed CSR
- EDI121599001 TN vs. RSAG validation
- EDI02090001 Electronically Order Routing to OS/DA
- ED1030300 001 BST Test Environment

Status: Test Environment is targeted for implementation 4Q00.

- CR0002 Pre-Order/Order Business Rule Discrepancies
- CR0003 RPON Business Rules and Error Messages

Status: Advance copy of RPON Business Rules published to CLEC community on 8/16/00. Rules were originally targeted for publishing in the 8/25/00 BBR-LO update and the 8/29/00 LEO-IG Vol 1 update. The publishing date for the BBR-LO has been delayed due to the number of changes. A Carrier Notification letter will be posted with the new publishing date. It is anticipated that the new publishing date will be the week of 8/28/00.

- CR0014- LENS Screen Change on Change Orders
- CR0015 LENS ACT of C Change Basic Class of Service
- CR0016 Service Inquiry Enhancement for SL1, SL2, DS0, DS1 and ISDN loops
- CR0020 View Multiple CSRs Simultaneously
- CR0029 Partial Migration of UNE Loops (ReqTyp A)
- CR0030 UNE to UNE Migrations
- CR0031 Change Listing Account in LENS
- CR0038 TOS Field on LSR ReqTyp J (TCIF 9)
- CR0040 Order Tracking Request
- CR0045 LENS 6.3 Conversion As Is Not Stripping Non-Resellable USOCs
- CR0047 Display Enhanced MemoryCall Access Number in LENS
- CR0078 Extended Loops via EDI
- CR0085 Web-based LSR

The following change requests are in "Pending" status:

CR0068 – Pipe-cross USOC

Status: CR originally submitted as a defect. The LNPGW is responding to the LSR based on what is populated on the CSR. LNPGW to implement feature to modify requirements. Target imp date TBD.

CR0088 – Unbundled Terminating Wire (UNTW) Service Requests via EDI

Status: CR to be prioritized at the September Change Review Meeting.

CR0101 - Request EDI Pre-Ordering

Status: CR to be prioritized at the September Change Review Meeting.

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CR0113 - LENS Inquiry - View Customer Record

Status: CR to be prioritized at the September Change Review Meeting.

	CR0117 - Update Issue 7 Map Due Date Calculation Tables w/information from BST Products & Intervals Guide. Status: CR to be prioritized at the September Change Review Meeting.
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	The following Change Requests are scheduled for upcoming releases:
Scheduled	
	 LSR0623990001 Redirection of UNE LSRs in the LCSC - Targeted for 8/27/00
Change	 CR0059 - Change TN Reservation Period - Targeted for 4Q00
Requests	 CR0077 Subscription Version Cancellations – Targeted for 8/27/00
	• CR0092 - DFDT & CHC Defect Request - Targeted for 8/27/00 (EDI only)
	• CR0102 - NUM=TELNO=ACCT is Final Reject - Targeted for Rel 7.1 - 9/16/00
	 CR0109 - GA 912/229/478 NPA Splits - Targeted for Rel 7.2 10/14/00
	• CR0112 - Conversion As-Is ACT W Defect - Targeted for Rel. 7.1 - 9-16-00
	 CR0115 - Partial Pre-Order Query Duc Date Calculation - Targeted for Rel 7.1 9/16/00
	 CR0116 - Premise Visit Indicator - Targeted for Rel 7.1 9/16/00
į	 CR0118 – Remove Housenumprefix for TAG API 2.2.0.10 – Targeted for Rel. 7.1 9/16/00
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ED10812990001 Electronic ordering for unbundled XDSL loops - Beta testing 7/29/00 Implemented TAG0812990002 DSL Capability - Beta testing 7/29/00 Change OSS011300_001 LNA of G for LENS - Rel 7.0 8/12/00 (bus rules to be posted 8/25) Requests CR0062 Open REQTYP P/2nd TOS of E to Identify Centrex Services (manual) - 7/18/00 CR0067 Call Return Invalid with Class of Service USOC UEPRX - Imp. 6/2/00 CR0071 ECCKT data on FOC/CN with CLS or CLF - Rel 7.0 8/12/00 CR0075 LESOG is clarifying for 1MBFE in error – Rel 7.0 8/12/00 CR0076-LESOG is failing to generate port side of order when adding line - Rel 7.0 8/12/00 CR0084 – TAG 2.2.0.8 Security Exception Error Defect – Imp. 6/20/00 CR0090 - EDI/TAG LSR Auto-Clarify - Imp 7/9/00 CR0119 – LESOG Auto clarifying NUM=TELNO-TN not in CRIS – Rel 7.0 8/12/00 CR0120 - SOCS RT60 Invalid NPA NXX for Routing SUB 001 - Rel. 7.0 8/12/00 CR0124 - LESOG to Cancel N & D if unsuccessful in generating both - Rel. 7.0 8/12/00. CR0125 - Receiving error message when placing order to add VCA & RJ11C in LENS -Release The following change requests were canceled between July 26 - August 22: Canceled Change CR0046 - EDI Reject Process Modification Requests CR0051 – LENS 6.3 – Expand Service Details for Floating FIDS CR0052 - WSOP Field Requirements Regarding EDI Type Orders CR0072 - LEO should pull BAN1 from Svc Order & Return on the FOC/CN CR0097 - LENS defect CR0114 - TN Reservation Defect CR0138 - Fielded Completion Notice 高级医高速压缩 化氯磺酚磺 医抗毒素性黄素性病 医克里氏氏管 医水体 医性外孔 等于,因此是一个一个一个女子的说,是一种的意思的 Defect Change The following defect change requests statuses are provided: Requests (Type 6) CR0008 - YPQTY-WPQTY (Iss 7) RegType -E Reject Code must be 2 numerics -(Deltacom) Status: Open - Currently under appeal. • CR0013 – Date Sent/Century Defect (EDI) – (Nextlink) Status: Open - Validation response provided on 4-20. Waiting on originator to authorize closure. CR0023 – OSS'99 Ordering Guidelines – (AT&T) Status: Open - Validation response provided on 5-3-00. AT&T has requested that this remain open until all guidelines have been updated. CR0024 – Hunt Group Defect on a Separate CSR – (Adelphia) Status: Open - Validated as a defect and waiting on originator to authorize closure. CR0039 - FOC Not Populating Order number on Port Order - (BST on behalf of Albion Connect) Status: Open - Determined to not be a defect. Waiting on originator to authorize closure.

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CR0049 – LENS TNs for each PON on bulk order (BST)

Status: Open - Pending clarification.

• CR0050 – LENS 6.3 - # of Directories for white & yellow (BST)

Status: Determined to not be a defect, but will be entered as a feature to be targeted in a future release.

- CR0066 Invalid USOC for Basic Class of SVC Format CREX7/TN (AT&T) Status: Open Validated as a documentation defect. Provided a work aid on 8-10 and will be providing additional information on when the documentation will be updated.
 - CR0070 Call Forwarding USOC Defect (AT&T)

Status: Open - BellSouth determined this not to be a defect. The USOC populated is not valid with the FID provided. The USOC GCE is call forwarding busy line, the CFND FID with RCYC is for call forwarding don't answer. Waiting on CLEC to inform when request can be closed.

- CR0073 LEO should pull Ported number & return on FOC/CN (BST)
 Status: Determined to be a defect and will be corrected in a future release TBD.
- CR0074 TAG is requiring the end user address in error for ReqTyp E: Act of C (BST) Status: Determined to be a defect and is targeted for a future release TBD.
 - CR0079 TAG IS REQUIRING "INIT" (BellSouth)

Status: Open - BellSouth determine that this request is not a defect. The system works per requirements. Originator has appealed the validation response.

- CR0080 LESOG is failing to issue Port Loop Combo accurately (BellSouth)

 Status: Verified Electronic System Support (ESS) has determined that this is a defect and will be corrected in a future release.
 - CR0081 LESOG is populating an incorrect due date interval on SL1; ACT of A; (ISSUE 9) (BellSouth)

Status: Open – BellSouth is has determined that this is a defect. LSOG is not establishing the Standard Due date intervals as five business days per requirements. The fix is targeted for a future implementation date.

- CR0082 LEO IS FAILING TO EDIT FOR LOCQTY (BellSouth)

 Return Open BellSouth requested further election from existing to the control of - Status: Open BellSouth requested further clarification from originator.
- CR0098 Re-Calculate Due Date Intervals (BellSouth)

 Status: Open BellSouth has determined that this is not a defect, however additional testing is being performed.
- CR0099 ORDER MA'D AND SERVICE ORDER INFO DELETED (BellSouth)

 Status: Open BellSouth has determined that this is not a defect, however the decision is being made as to whether this will become a feature.
- CR0100 TAG is failing to accurately calculate due dates on deny and restore (BST) Status: Determined to not be a defect, however a feature will be opened targeted for a future release.

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CR0107 – Documentation Defect – CIC (AT&T)

Status: Open - Still under investigation. Once clarified, the necessary update to the verbiage for the CIC field will be input and posted to the Web by no later than 8-31-00.

- CR0108 Listings over the number of 2 are not shown on LSR or order (BST) Status: BellSouth determined that this is a defect and is being targeted for a future release TBD. Manual intervention is recommended.
- CR0110 LESOG not populating ZNEA & ZNHC on ACT of N or C (BST)

 Status: BellSouth determined that this is not a defect, but recommended that a Feature be opened. This feature will be targeted for a future release TBD.
- CR0123 LENS Application Enhancement (Gulf Coast Communication)

 Status: BellSouth determined that this is not a defect and is waiting on the originator to authorize closure.
- CR0126 LESOG should pull the correct CFN number for enhanced MMC (BST)

 Status: BellSouth determined that this is a defect and will be corrected in a future release TBD.
- CR0129 LESOG failing to apply ZRTI to orders (BST)
 Status: BellSouth determined that this is a defect and will be corrected in a future release TBD.
 - CR0130 LESOG not responding to "C" order adding line & features on Resale Accounts
 (BST)

Status: BellSouth determined that this is not a defect and is waiting on the originator to authorize closure.

• CR0136 - Address Validating in LENS but not in TAG on old RSAG history - (BST) Status: BellSouth determined that this is a defect and will be targeted for a future release TBD.

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the state of	RELEASE RELEASE NEW YORK CONTROL		·
Report of	The following Type 1 System outages have on	curred since the last Status Meeting:	
System	LENS-6	. B.	İ
Outages	EDI – I		
Outubes	TAG-3		
	CSOTS - 1		
,	Details of each outage are posted on the Chan	re Control Website at	
	www.interconnection.bellsouth.com.	ge Comor Website at	
		TO SERVICE THE SERVICE SERVICE	
Release	The target date for LNP Release 5.1 is 8/27/00		
	LSR0623990001 - Redirection of UNE L	-	
Management Status			
Diatus	 CR0077 – Subscription Version Cancellat 	on	
	• CR0092 – DFDT & CHC (for EDI only)		
	m	1 . 0.00.000 +0.00.00	
	The target date for Release 7.1 is 9/16/00 (dat	e may change to 9/30/00 or 10/7/00 d	ue to Line
	Sharing mandate):		
	 CR0112 – Conversion As-Is ACT W Defe 	ct .	
	 CR0115 - Partial Pre-Order Query DDC 		
	 CR0116 – Premise Visit Indicator 		
;	 CR0118 – Remove HOUSENUMPREFIX 	from TAG	1
	The target date for Release 7.2 is 10/14/00:		
	 CR0109 – GA 912/229/478 NPA Split 		
	•		J
	The target date for Release 8.0 is 11/11/00:		1
	The proposed scope for Release 8.0 should be	complete within two weeks. A confe	erence call will
	be scheduled to review.	•	
			1
		2. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	
Upcoming	Release 8.0-scope conference call is targeted	within the next two weeks.	
Meetings			
	The Change Review Meeting (prioritization)		
	Meeting details were distributed on 8-16-00.	This will be a face-to-face meeting in	Atlanta, GA.
	The meeting will be held at the BellSouth Cor	ference Center, 1447 NE Expresswa	y, Atlanta, GA
	30329. The meeting will begin at 8:30 AM E	astern and last to approximately 3:00	PM.
	Please R.S.V.P. with your number of attendee	s to Change.Control@bridge.bellsout	h.com by no
!	later than 9/13/00.		
	Change Requests must be accepted and in "Pe	nding" status by 9/18/00 to be placed	on the Change
	Review Meeting agenda for prioritization.		
	The Change Review Meeting package will be	distributed to CLEC community bety	veen 9/18-9/20.
			,
	CONTROL OF THE PROPERTY OF		
Issues – Interim	 Changes to CR form – adding the Change 	ange Control email address	
Change Control	BellSouth has updated the RF1870 (Chan	ge Request Form) with the Change C	ontrol email
Process	address.	•	
	2) Section 10 - Testing Environment		
	Change Control recommended the follow	ing changes to the Testing Environme	ent section of the
	Interim CCP document:	Docket No. 000731-TP	
09/13/00	CCP Monthly Status Meeting	JMB-R14	8_23msc,doc

- 4th paragraph, indicate that the testing guidelines are located on the BellSouth web site and provide web site address for EDI and TAG.
- Remove last paragraph regarding BellSouth currently investigating and pricing the feasibility of a non-production testing environment since this request is targeted for 4Q00 implementation.

The above was acceptable to the CLEC community.

3) Defect/Expedited Feature process was reviewed/discussed. Four major changes have been made to the draft: (1) Included expedites as Type 6 Change Request, (2) Expanded the defect definition (3) Added High, Medium and Low Impact Levels and (4) Added intervals for implementing the High Impact levels.

Everyone agreed to make the following changes to the draft:

- Include documentation defects in the defect definition.
- Add "no electronic" workaround to High Impact definition
- Step 3 add decision step if CR is validated as a High Impact
- Step 3 5th bullet change verbiage to match new defect definition
- Initial Release Notification would be 30-day advance notice. If changes are made to the scope, a revised notification letter will be posted 2 weeks prior to implementation date. If additional changes are made to the scope of the release within the 2-week period, a post-release notification letter will be posted.

Change Control agreed to address the following concerns raised by the CLEC community:

- Step 4 time interval for workaround
- Time interval for implementing a High Impact expedite
- Providing a patch code (as a workaround) for expedites
- Process and M&P changes included in 5 business day advance notification

Note: The "draft" Defect/Expedite Feature process will be incorporated into the Change Control Process document and will remain a "draft" as BellSouth works to address the issues raised by the CLECs.

4) Courtesy copies Carrier Notification Letters

BellSouth explained that BST business decisions that are made due to business drivers for efficiencies do not flow through Change Control. This information is posted in the form of Carrier Notification Letters and posted to the Interconnection Web site. Some examples of these Carrier Notifications were given:

- New LCSC Fax Numbers
- Manually submitting LSOG 4 Forms
- Methods for submitting manual Local Service Requests (LSRs)
- Packaging features/services offered at a discounted rate (BellSouth Essentials)
- Updates to the LEO-IG

BellSouth started sending courtesy copies of these types of notifications over the last week. The intent is to provide information to the CLEC community prior to it being posted to the Web site.

The CLECs expressed their approval and agreed that continuing to receive this information Via email through Change Control would be beneficial.

5) Vote on baseline CCP document.

Valerie Cottingham explained the joint efforts in achieving the progress we have with the Interim CCP. She mentioned a few of the major improvements that have been made to the process since the discussions, with a few CLECs, began in February 2000. Some of the enhancements that were mentioned are:

- CCP now incorporates defects/expanded the defect definition
- Notify CLECs of new CRs and other statuses by email and through the new CCP Website
- Have monthly status meetings with SME participation, as needed. Will also include SME participation at Change Review Meetings, as needed.
- Formal escalation process
- Incorporated Introduction/Retirement of Interfaces; will allow input from CLECs

Valerie emphasized that the Interim process is a working document, not a final document. BellSouth is committed to working with the CLEC community to address their needs and Concerns. She asked for a consensus that the Interim process be accepted as the new Baseline for building upon. The results of the vote are as follows:

Woody Roe, Albion-Connect - Yes
Lorraine Watson - Worldcom - Yes
Shamone Stapler - ITC/Deltacom - Yes
Mubeen Saifullah, Nightfire - Yes
Donna Graham - Mantiss - Yes
Malinda Saxon - Trivergent - Yes

Jill Williamson - AT&T - No

Reasons:

- 1) AT&T does not agree with the time intervals
- 2) AT&T does not think that BST should reject Change Requests
- 3) The defect/expedite process should be finalized

Sandy Evans - Sprint - No

Reasons:

- 1) Sprint does not agree with the intervals
- 2) Sprint does not agree with the length of time that some change requests have been in the process.

Phyllis Burt - Quintessent - No

Reason:

1) Quintessent does not agree with the intervals

BellSouth requested examples from Quintessent dealing with not meeting intervals.

Since the vote was 6-3 in favor with 1 abstention from dsl.net, Change Control will make this document the new "baseline" document for the Change Control Process.

Action Items	1. Investigate if there will be a standard process for handling 411 drops. (BellSouth) 2. Add CR0110 to CR Log. (BellSouth)
	3. Send Steve Murray a copy of the CR Log and Defect/Expedite draft process that was discussed on the call. (BellSouth)
	4. Investigate time intervals for defect/expedite workaround. (BellSouth)
	5. Investigate time interval for implementing a High Impact expedite. (BellSouth)
	 Determine if BellSouth can provide a code "patch" (as a workaround) for expedites until a permanent fix is implemented. (BellSouth)
	 Determine if Process and M&P changes are included in the posting of notifications of documentation updates (non-system changes) 5 days prior to the documentation posting date. (BellSouth)
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BellSouth Interconnection Services Suite 200 1960 West Exchange Place Tucker, GA 30084 AT&T Regional Account Team

770 492-75**50** Fax 770 492-9412

December 1, 2000

Ms. Denise Berger AT&T Room 12256 1200 Peachtree St. NE Atlanta, GA 30309

Dear Denise:

This is in response to your e-mail dated November 21, 2000, requesting BellSouth to manually load information regarding another AT&T customer into the Calling Name (CNAM) database.

As you know, BellSouth has offered to provide AT&T and other CLECs with a mechanized process for inputting ported numbers information into BellSouth's CNAM database. BellSouth has offered this process at no charge. On October 20, 2000, you received from BellSouth the initial form necessary to initiate this process. Four days later, during a conference call between AT&T and BellSouth's CNAM subject matter experts, AT&T was advised that the process could probably be put in place between 4 – 6 weeks after AT&T completed and returned all the necessary forms to BellSouth.

I received the completed initial form from you on November 2, 2000. After making the corrections that I confirmed with you, I provided the corrected initial form to BellSouth's internal group responsible for CNAM interconnection. The next day, November 3, BellSouth contacted AT&T's designated representative and provided the second form that must be completed before BellSouth begins implementing this process. AT&T has yet to complete this second form and return it to BellSouth.

When BellSouth agreed to enter the Dillard's information manually into the BellSouth database, it was with the understanding that AT&T would expeditiously pursue the interim mechanized solution. Since then, AT&T has continued to acknowledge that it intends to pursue the interim mechanized solution. As you know, the interim solution is quicker and more efficient that manually inputting data into the CNAM database on a case-by-case basis. The process benefits AT&T's customers by automatically addressing the calling name delivery situation. I trust that AT&T is, in fact, diligently pursuing the completion of the form that will allow BellSouth to implement this mechanized solution, and I am requesting that AT&T return the completed second form to me by December 5, 2000. If AT&T cannot return this form to BellSouth by December 5, please let me know immediately.

In the meantime, BellSouth will manually enter the information for the ported telephone number of Dow, Lohnes & Albertson into its CNAM database. BellSouth, however, will not manually enter any additional information into its database until AT&T has returned the completed forms necessary to allow BellSouth to begin the implementation of the mechanized solution.

Sincerely,

Jan Flint

cc: Gre

Greg Terry Bob Bickerstaff Jan Burriss

Bradbury, J M (Jay) - LGA

From: Berger, Denise C - NCAM

Sent: Monday, October 30, 2000 10:45 AM To: Jan.Burriss1@bridge.bellsouth.com

Cc: bob.bickerstaff@bridge.bellsouth.com; Sandra.Jones5@bridge.bellsouth.com;

Leigh.Wilson@bridge.bellsouth.com

Subject: BellSouth Reassigning AT&T Ported Numbers

October 30, 2000

Jan Burriss
BellSouth Telecommunications, Inc.
1960 West Exchange Place
Suite 200
Tucker, Georgia 30084

RE: BellSouth Reassigning AT&T Ported Numbers

Dear Jan:

The purpose of this letter is to inform BellSouth that AT&T is still experiencing problems with BellSouth reassigning AT&T ported numbers. I am also asking for your assistance in insuring that BellSouth immediately put in place the necessary measures to

- Identify affected AT&T customers
- 2. Provide immediate remedy to those customers
- 3. Implement a solution that will prevent this from happening in the future $% \left(\frac{1}{2}\right) =\frac{1}{2}\left(\frac{1}{2}\right)$

Tropical Shipping in Riviera Beach, Florida, the first AT&T customer who experienced this, has been remedied. According to the memo I received last week from Sandra Jones, BellSouth discovered that the BellSouth order process requires an identification code with ported telephone numbers that indicates in the BellSouth databases that the numbers are assigned as ported and currently unavailable. In the case of Direct Inward Dialing (DID) service, each telephone number within the DID number block must carry the identification code. I now have three other customers affected by the same problem, two in Florida and one in Georgia.

1. Con-

This customer originally ported to AT&T in August of 1999. The blocks

of numbers assigned to Con-

Numbers in this block are being reassigned by BellSouth to residence and

small business customers. Numbers identified as reassigned to date are

There may be

others. The trouble was called in to the AT&T Maintenance Center and a

ticket was opened.

The AT&T Maintenance Center tried to call in a ticket to the

BellSouth

Maintenance Center, but was referred to the Account Team instead.

2. Wacker

Gardens, FL 33418

I'm still gathering information on this customer's situation. The only number I've identified at present as having a problem is

I have a third customer identified and as soon as I get information, I will forward it to you.

Denise C. Berger
District Manager-Local Supplier Performance
404/810-8644 (Voice)
404/810-8605 (Fax)
800 258-0000, PIN #2589558 (Pager)
deberger@att.com



BallSouth Intercennection Services Suita 200 1980 West Exchange Piece Tucker, GA 30084 AT&T Regional Account Team

770 492-7550 Fax 770 492-9412

November 17, 2000

Ms. Denise Berger AT&T Room 12256 1200 Peachtree St. NE Atlanta, GA 30309

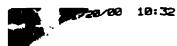
Dear Denise:

This is in response to your e-mail dated October 30, 2000, regarding BellSouth's reassigning telephone numbers ported by AT&T. Your e-mail requests that BellSouth identify the affected AT&T end users, provide immediate remedy to those customers and put measures in place to prevent further occurrences. To date, five of AT&T's end users' telephone numbers have been reassigned to other BellSouth customers and those situations have been corrected.

The information provided to you by Sandra Jones is correct. In 1999, BellSouth identified the problem created by service orders without the identification code on ported numbers. In December 1999, BellSouth implemented an edit in its service order system to ensure that the codes are always placed on porting service orders. BellSouth also initiated an intensive effort between BellSouth's Local Carrier Service Center (LCSC) and Network organizations to identify ported telephone numbers that did not have the appropriate ported and unavailable identification code and to manually apply the needed code.

BellSouth's Direct Inward Dialing (DID) telephone numbers are not eligible for reassignment to new customers for a period of one year. The telephone numbers assigned to AT&T's five end users that were reassigned to new BellSouth customers were missed by BellSouth's efforts to identify ported telephone numbers without the ported code. After residing in BellSouth's assignment database for a year without the code, the telephone numbers were incorrectly assigned.

BellSouth regrets any problems that this situation may have caused AT&T and its end users. However, there is no further mechanism or feasible process that BellSouth can follow to identify additional DID telephone numbers ported by AT&T that are missing the ported code in BellSouth's database. All practicable steps have been taken and the potential impacts have been minimized. In the event other AT&T end users' telephone numbers are incorrectly reassigned, BellSouth has implemented an emergency procedure to expedite a resolution. Two LCSC managers have been assigned the primary responsibility for resolution of any end-user customer problems associated with this issue. Additionally, two service representatives have been designated to handle the specific tasks required by BellSouth to correct the problems. All LCSC managers and service representatives have been covered on the problem, and LCSC



management believes that this "task force" approach will provide the most expeditious handling of any future problems that may occur. The appropriate manager contacts are as follows:

Felicia Rainey 770-986-2690 770-986-2125 Pat Hamlin

If we need to discuss this issue further, please feel free to call me at 770 492-7590.

Sincerely,

cc: Sandra Jones Felicia Rainey Pat Hamlin

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----Original Message----
            Berger, Denise C, NCAM
> From:
            Wednesday, November 22, 2000 11:06 AM
> Sent:
> To: BST-Jan Flint (E-mail)
> Cc: BST-Jan Burriss (Business Fax); BST-Sandra Jones (E-mail)
> Subject: Another Number Reassignment
> November 22, 2000
> Jan Flint
> BellSouth Telecommunications
> 1960 West Exchange Place
> Suite 200
> Tucker, Georgia
                  30084
> RE: Automotive Controls
> Dear Jan:
> This message will confirm our conversation earlier this morning.
> We've had another complaint of customer's having numbers reassigned
by BellSouth. Automotive Controls, TN 770-409-5092, was ported to AT&T
on July 20, 1999. Yesterday, calls for this customer started
terminating at a BellSouth residence customer. The BellSouth customer
stated that he had recently been assigned the number by BellSouth.
> Please insure that this customer's problem is resolved today. As we
discussed, if it is not resolved today, then the AT&T customer will
likely be service impaired through the holiday weekend. I will look to
have status from you as to the expected resolution by noon today.
> Thanks,
> Denise C. Berger
> District Manager-Local Supplier Performance
> 404/810-8644 (Voice)
> 404/810-8605 (Fax)
> 800 258-0000, PIN #2589558 (Pager)
> deberger@att.com
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> ----Original Message----
> From:
            Berger, Denise C, NCAM
> Sent:
            Wednesday, November 22, 2000 11:14 AM
> To: BST-Jan Burriss (E-mail)
> Subject: FW: Another Number Reassignment
> Jan,
> As you can see, we continue to have this problem. What action will
BellSouth take to proactively find customer's in jeopardy before
their service is disrupted?
> In your letter to me dated November 17, 2000, you stated that "there
is no further mechanism or feasible process that BellSouth can follow
to identify additional DID telephone numbers ported by AT&T that are
missing the ported code in BellSouth's databases."
> I am respectfully requesting that BellSouth capture all orders placed
by AT&T prior to December of 1999 to port DID numbers. This presumably
will collect the universe of orders in jeopardy. I am then requesting
that BellSouth go in to its databases on all of these orders to
determine which ones have been reassigned to the available number pool
and mark them as ported to AT&T and therefore unavailable.
> The last instance of this that was referred to BellSouth took the
majority of one business day to resolve. It is only right that
BellSouth should take all possible steps to insure that no more AT&T
customers are impaired due to this BellSouth problem.
> I look forward to your response.
> Denise C. Berger
> District Manager-Local Supplier Performance
> 404/810-8644 (Voice)
> 404/810-8605 (Fax)
> 800 258-0000, PIN #2589558 (Pager)
> deberger@att.com
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BellSouth Interconnection Services

Surte 200

1960 West Exchange Place Tucker, GA 30084 **AT&T Regional Account Team**

770 492-7550 Fax 770 492-9412

December 4, 2000

Ms. Denise Berger AT&T Room 12256 1200 Peachtree St. NE Atlanta, GA 30309

Dear Denise:

This is in response to your email of November 22, 2000 to Jan Burriss regarding the reassignment of numbers and, specifically, your request for BellSouth to capture all orders placed by AT&T prior to December 1999 to port Direct Inward Dialing (DID) numbers.

BellSouth Subject Matter Experts have reviewed your request for BellSouth to capture all orders to port DID numbers placed by AT&T prior to December, 1999 and to compare those numbers to the BellSouth databases to proactively identify additional "reassigned" telephone numbers. As Jan Burriss stated in her letter to you dated November 17, 2000, BellSouth implemented an intense telephone number review process in December 1999. This process allowed BellSouth to identify and correct the majority of the numbers that lacked the appropriate identification code. Unfortunately, as AT&T has experienced, the effort did not capture all such numbers.

To implement a solution, such as you outlined, could take several months of Information Technology (IT) development. By the time this is accomplished, the window of opportunity for this error will be closed. The edit to identify this error was implemented in December 1999. Therefore, the opportunity for a telephone number incorrectly remaining and available for assignment in BellSouth's number assignment database (ATLAS) continues to decline. Additionally, the occurrence of the problem relative to the total DID numbers ported is not significant. Based on the above, BellSouth will continue to handle these instances on a case—by-case basis.

If you have questions, please call me at 770-492-7558.

Sincerely

Sandra C. Jones

Sales Director - AT&T Account Team

CC: Greg Terry
Jan Burriss
Bob Bickerstaff

7		BELLSOUTH TELECOMMUNICATIONS, INC.
2		DIRECT TESTIMONY OF RONALD M. PATE
3		BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
4		DOCKET NO. 11900-U
5		November 13, 2000
6		
7	Q.	PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8		TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.
9		
10	A.	My name is Ronald M. Pate. I am employed by BellSouth
11		Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
12		Services. In this position, I handle certain issues related to local
13		interconnection matters, primarily operations support systems ("OSS").
14		My business address is 675 West Peachtree Street, Atlanta, Georgia
15		30375.
16		
17	Q.	PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.
18		
19	A.	I graduated from Georgia Institute of Technology in Atlanta, Georgia, in
20		1973, with a Bachelor of Science Degree. In 1984, I received a Masters of
21		Business Administration from Georgia State University. My professional
22		career spans over twenty-five years of general management experience in
23		operations, logistics management, human resources, sales and marketing.
		Docket No. 000731-TP JMB-R17 Page 1 of 20

1		I joined BellSouth in 1987, and have held various positions of increasing
2		responsibility.
3		
4	Q.	HAVE YOU TESTIFIED PREVIOUSLY?
5		
6	A.	Yes. I have testified before the Public Service Commissions in Alabama,
7		Florida, Georgia, Louisiana, South Carolina, the Tennessee Regulatory
8		Authority and the North Carolina Utilities Commission.
9		
10	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
11		
12	Α	The purpose of my testimony is to address BellSouth's response to !ssue
13		5, Line Sharing and Issue 7, Operations Support Systems ("OSS") as
14		identified in Georgia Public Service Commission Docket No. 11900-U,
15		Second Procedural and Scheduling Order. I will also address the FCC'S
16		Third Report And Order And Fourth Further Notice Of Proposed
17		Rulemaking In CC Docket 96-98 (FCC 99-238); Released November 5,
18		1999, (UNE Remand Order) as its relates to BellSouth's OSS including a
19		new requirement that BellSouth must provide Competitive Local Exchange
20		Carriers ("CLEC"s) access to loop make-up data via BellSouth's OSS.
21		Additionally, I will address BellSouth's OSS solution to satisfy the FCC's
22		Third Report and Order in CC Docket No. 98-147 and Fourth Report and
23		Order in CC Docket No. 96-98, released December 9, 1999 (Line Sharing

1		Order) requiring that incumbent LECs unbundle the high frequency portion
2		of the loop to permit the CLECs to provide xDSL-based service by sharing
3		the lines with the incumbent's voiceband service.
4		
5	issu	e (7) (a) Operations Support Systems ("OSS"): What pre-ordering and
6		ordering functionalities must BellSouth make available to CLECs to
7		support CLECs ordering of xDSL Loops, in what form must
8		BellSouth make such functionalities available, and by when must
9		BellSouth make such functionalities available?
10		(7) (b) Operations Support Systems ("OSS"): Should BeliSouth be
11		required to make available to CLECs an integrated pre-ordering and
12		ordering electronic interface OSS, and if so by what date?
13		
14	Q.	DID THE FCC'S UNE REMAND ORDER IMPACT BELLSOUTH'S OSS
15		AS THESE OSS ARE USED BY CLECS?
16		
17	A.	The UNE Remand Order did not impact the existing CLEC OSS access
18		offered by BellSouth other than to specify at paragraph 426 that "the pre-
19		ordering function includes access to loop qualification [make-up]
20		information."
21		

1	Q.	WHAT IS BELLSOUTH'S RESPONSE TO THE FOO'S REQUIREMENT
2		THAT LOOP MAKE-UP INFORMATION BE AVAILABLE TO CLECS AS
3		PART OF THE PRE-ORDERING FUNCTION?
4		
5	A.	BeliSouth has developed and implemented procedures to provide CLECs
6		with detailed loop make-up information via the manual Service Inquiry (SI)
7		process. Additionally, BellSouth has under development a detailed
8		mechanized Loop Make-up pre-order process that is accessible through
9		all current electronic interfaces that support pre-order functions (LENS,
10		TAG, and RoboTAG [™]). This process will be available to any CLEC that is
11		interested in incorporating these procedures into its interconnection
12		agreement. BellSouth witnesses Ms. Caldwell and Ms. Cox address the
13		costs and BellSouth's proposed rates associated with the work required to
14		incorporate this process into the pre-ordering function.
15		
16	Q.	PLEASE DESCRIBE THE MANUAL LOOP MAKE-UP SI PROCESS.
17		
18	A.	The loop make-up data is defined as the physical characteristics of the
19		loop facilities. The data begins at the BellSouth central office, is listed in
20		sequential order, and ends at the serving distribution terminal. Loop
21		make-up data consists of such information as cable gauge and length,
22		bridged taps, load coils, presence of Digital Loop Carrier ("DLC"), and
23		other equipment that is part of local loop facilities.

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The CLEC completes the "Customer Information" section of the Loop Make-up SI form indicating if it wants the loop make-up by telephone number or address/circuit identifier. The CLEC submits the Loop Make-up SI form to the Complex Resale Services Group ("CRSG") or their Account Team with a Local Service Request ("LSR"). The CRSG/Account Team forwards the SI form to BellSouth's Outside Plant Engineering Service Advocacy Center ("SAC"). The SAC verifies the availability of loop facilities. If the Loop Make-up SI indicates the CLEC wants the make-up by telephone number or circuit identifier the SAC will return a specific make-up for the requested telephone /circuit identifier. If the Loop Make-up SI indicates the CLEC wants the make-up by address, the SAC will return a specific make-up for the requested address.

The SAC will supply make-up for either suitable copper pair(s) or DLC pairs as requested by the CLEC for the requested address, telephone number or circuit identifier. If either a copper pair, or DLC, but not both exists at that address/telephone number/circuit identifier, the SAC will indicate in the "Comments Section" which is not available at the requested address/telephone number. The following is an example comment for an existing DLC make-up where a copper pair does not exist: "Provided DLC make-up at above address, no copper pairs exist at this location". Again, the loop make-up will be listed in sequential order starting at the central

1		office and ending at the end user terminal. The SAC will return the
2		completed Loop Make-up SI to the CRSG/Account Team. The
3		CRSG/Account Team reviews the SI form for completeness and forwards
4		the loop make-up SI request along with the LSR to the Local Carrier
5		Service Center ("LCSC") for confirmation of a complete and accurate LSR.
6		The CLEC returns the Loop make-up response to the CLEC via electronic
7		mail. The LCSC provides a firm Order Confirmation ("FOC") to the CLEC
8		and generates a service order that automatically completes for billing the
9		service.
10		
11	Q.	IS THE MANUAL LOOP MAKE-UP SERVICE INQUIRY MERELY AN
12		INTERIM PROCESS UNTIL ELECTRONIC ACCESS IS AVAILABLE?
13		
14	A.	No. The manual Loop Make-up ("LMU") SI process will continue to be a
15		means for obtaining loop make-up information, even after electronic Loop
16		Make-up functionality is available. It will be necessary to use this process
17		for those situations where the Loop Facilities Assignment Control System
18		("LFACS") is not sufficiently populated with the data needed to make a
19		decision and thus the electronic LMU query does not meet the CLEC's
20		need. Additionally, this process will remain for those CLECs who choose
21		not to deploy the systems needed for the electronic query for LMU.
22		CLECs may obtain documentation for the current Unbundled Network
23		Element ("UNE") pre-ordering and ordering information pertaining to

1		BellSouth's manual loop make-up at BellSouth's Website:
2		http://www.interconnection.bellsouth.com/guides/bpobr.html
3		
4	Q.	CAN YOU ESTIMATE THE QUANTITY OF BELLSOUTH LOOPS THAT
5		HAVE DETAILED LOOP INFORMATION POPULATED WITHIN LFACS
6		THEREBY REDUCING THE NEED FOR A MANUAL SI?
7		
8	A.	While 100% of BellSouth's loops are populated in LFACS with certain
9		basic information, not all will have the detailed loop make-up information.
10		As a rule, BellSouth has populated detailed loop make-up for its designed
11		services which require special engineering and provisioning and often are
12		served by more than one central office or wire center. BellSouth has not
13		populated LFACS in the past with detailed loop make-up information for
14		non-designed services that require no special provisioning and are served
15		by one central office or wire center because it did not need the detailed
16		loop make-up information on these services. However, in the high-
17		populated metropolitan areas where the marketing efforts of CLECs are
18		most likely to be concentrated, it is approximated that as much as 80% of
19		loops with detailed loop make-up information are populated in LFACS. So
20		it is only for that remaining small percentage of loops that the manual SI
21		process may have to be utilized. And whenever CLECs must use the
22		manual SI process for these remaining loops, BellSouth will load the
23		resulting loop make-up information in LFACS for future queries.

1		•
2	Q.	DID THE UNE REMAND ORDER REQUIRE ELECTRONIC ACCESS TO
3		BELLSOUTH'S OSS FOR CLEC XDSL SERVICE REQUESTS?
4		
5	A.	No. The FCC UNE Remand Order did not require access to pre-order and
6		ordering functionality associated with xDSL service request be electronic.
7		The FCC stated "That interface and gateway issues are already captured
8		in the nondiscriminatory access requirements of the Local Competitive
9		First Report and Order." The FCC further stated that the *LEC must
10		provide the requesting carrier with nondiscriminatory access to the same
11		detailed information about the loop that is available to the incumbent
12		LEC. ⁴²
13		
14	Q.	IS BELLSOUTH DEVELOPING A MEANS TO PROVIDE CLECS WITH
15		ELECTRONIC ACCESS TO LOOP MAKE-UP INFORMATION AND
16		ELECTRONIC ORDERING OF XDSL LOOPS?
17		
18	A.	Yes. BellSouth is developing a comprehensive electronic process for pre-
19		ordering and ordering for CLECs via the Telecommunications Access
20		Gateway ("TAG"), RoboTAG™and Local Exchange Navigation System

21

22

the Loop Facilities Assignment and Control System ("LFACS") and

("LENS"). It provides electronic access to loop make-up information from

 ¹ CC Docket 96-98, Paragraph 426, page 193, released November 5, 1999
 ² CC Docket 96-98, Paragraph 427, page 193, released November 5, 1999

i		electronic ordering of XDSL loops. Belisouth is also enhancing the
2		Electronic Data Interchange ("EDI") to provide electronic ordering of xDSL
3		loops. These enhancements are currently in beta testing with selected
4		CLECs. Interested CLECs will need to conduct System Readiness Testing
5		("SRT") with BellSouth prior to using these new functions when they
6		become available in production. If they have not done so already, CLECs
7		must also upgrade their TAG interfaces to the TCIF 9.0 version in order to
8		test the new functions and then use them in production. CLECs may
9		obtain information on the manual and electronic ordering of BellSouth
10		Loop Make-up at the BellSouth Website:
11		http://interconnection.bellsouth.com/products/UNE/bstlmu.pdf.
12		
13	Q.	HOW WILL BELLSOUTH IMPLEMENT THIS PLAN FOR ELECTRONIC
14		ACCESS TO LOOP MAKE-UP INFORMATION AND ELECTRONIC
15		ORDERING OF XDSL LOOPS?
16		
17	A.	BellSouth is implementing a vendor solution provided by Telcordia
18		Technologies, Inc. to provide the OSS necessary for the pre-ordering,
19		ordering and provisioning of CLEC xDSL loops. This extensive technical
20		solution provides Pre-Existing Licensed Software and Marketable
21		Licensed Software and Services to integrate Licensed Software for CLEC
22		xDSL into BellSouth's operations environment. As an example, the
23		solution includes the establishment of a new corporate gateway along with

1	a new system architecture for the processing of Local Service Requests
2	("LSRs") for xDSL loops.
3	
4	The Corporate gateway establishes a single entry point for processing of
5	xDSL requests. It provides a flexible and expandable independent
6	gateway that has security, logging and mapping capabilities,
7	The Corporate gateway is configured to provide CORBA interfaces for the
8	TAG client APIs from the CLECs and an interface for BellSouth's OSS.
9	This allows pre-ordering and ordering functionality utilizing BellSouth's
10	LENS, TAG, and Robo®Tag electronic interfaces. It also provides a
11	navigator interface for the Local Service Requests Router ("LSRR"), which
12	permits firm ordering functionality utilizing the BellSouth EDI electronic
13	interface.
14	
15	The new system architecture known as Delivery Order Manager will
16	automate many of the service requests functions. Delivery Order
17	Manager can be described as a work flow sequencing and control
18	"engine" that works with partner applications to accept and process
19	service requests. Delivery Order Manager will manage the access to all
20	the databases needed to process a request. Some commonly known
21	databases for pre-order and order functionality are CRIS, CABS, RSAG,
22	ATLAS, and P/SIMS. In addition, Delivery Order Manager will access
23	LFACS for queries for loop make-up information. Delivery Order Manager

•		also line illega with a new Gerrice Order Centerator for the charitzed
2		service order creation allowing flow through of the requests to BellSouth's
3		Service Order Communications System ("SOCS"). In addition to the
4		software requirements and associated software Right-To-Use ("RTU")
5		fees, the Telcordia provided solution also provides support services.
6		Support services include such items as:
7		
8		Platform planning and support
9		Installation and system administration support
10		Services integration testing
11		Training and documentation
12		
13	Q.	WHAT IS THE CURRENT VALUE OF THE SOFTWARE AND SERVICES
14		SCOPE OF WORK THAT WILL BE PERFORMED BY TELCORDIA FOR
15		BELLSOUTH IN THE UNE REMAND FOR XDSL?
16		•
17	A.	The software and service fees total approximately \$28,500,000 for the
18		pre-ordering and ordering software and services provided by Telcordia
19		Technologies, Inc. This includes 3 enhancements to incorporate newly
20		identified functionality necessary to provide a full compliment of pre-order
21		and order capabilities.
22		

1	Q.	BASED ON CURRENT PLANS, WHEN WILL ELECTRONIC PRE-
2		ORDER AND ORERING CAPABILITIES BE AVAILABLE UNDER THE
3		TELCORDIA SOLUTION?
4		
5	A.	BellSouth currently has the pre-order functionality which includes, loop
6		make-up and the xDSL compatible loop firm order functionality in a Beta
7		testing environment. The pre-ordering functionality for xDSL is targeted for
8		deployment into the production environment in mid-to-late November
9		2000. BellSouth has encountered some problems that have delayed
10		deployment of xDSL firm ordering functionality. BellSouth is working with
11		Telcordia to establish dates when these problems will be corrected.
12		
13	Q.	PLEASE SUMMARIZE THE BENEFITS OF THE TELCORDIA SOLUTION
14		FOR CLEC XDSL PRE-ORDERING AND ORDERING.
15		
16	A.	The Telcordia solution provides CLEC xDSL pre-ordering and ordering
17		functionality that is fully integrated, highly extendable and scalable end-to-
18		end with maximum reuse of function. Through a strategic supplier
19		relationship, BellSouth benefits from expert planning assistance from a
20		world-class OSS and technology supplier. Finally, and very important,
21		BellSouth and its CLEC customers realize reduced costs from elimination
2 2		of complex product selection and multi-supplier systems integration work.
23		

1	Q.	DOES BELESCUTH PROVIDE ACCESS TO OTHER DATABASES THA
2		MAY BE USEFUL IN OBTAINING PRE-ORERING INFORMATION IN
3		CONNECTION WITH THE PROVISIONING OF CLEC XDSL SERVICE?
4		
5	A.	Yes. BellSouth provides information from its Loop Qualification System
6		("LQS"). LQS was designed as a tool for Network Service Providers, the
7		purchasers of BellSouth's tariffed industrial class ADSL offering (as
8		opposed to BellSouth's business class ADSL offering) to determine
9		whether a particular service location is qualified for BellSouth's industrial
10		class ADSL offering based on BellSouth's defined technical parameters.
11		In other words, by entering a telephone number, LQS provides the user
12		with a qualified "yes/no" response based on the technical parameters of
13		BellSouth's industrial class ADSL offering. LQS does not provide loop
14		make-up information as contemplated by the FCC's xDSL requirement.
15		Subsequent to the FCC's UNE Remand order, LQS was made available
16		for use by CLECs on an interim basis until the mechanized loop make-up
17		interface is deployed. However, the purpose of LQS did not change with
18		providing access to CLECs - it remains a tool designed to provide a
19		response to the inquirer if the location is qualified for BellSouth's ADSL
20		service. Once again, LQS does not provide the level of detailed
21		information in order that a CLEC may make an independent judgment
22		about whether the loop is capable of supporting advanced services
23		equipment the CLEC intends to install.

1		
2	Q.	HOW DOES A CLEC OBTAIN ACCESS TO LQS?
3		
4	A.	A CLEC may contact its BellSouth account team to obtain information on
5		gaining access to LQS. The account team will assist with the appropriate
6		documentation necessary to obtain a password and resulting access to
7		LQS. CLECs may obtain a Loop Qualification System DLEC/CLEC Job
8		Aid via the BellSouth Website:
9		http://www.interconnection.bellsouth.com/quides/bpobr.html
10		
11	Q.	YOU HAVE REFERRED TO BOTH BELLSOUTH INDUSTRIAL CLASS
12		ADSL AND BUSINESS CLASS ADSL. PLEASE DIFFERENTIATE.
13		
14	A.	My reference to BellSouth's industrial class ADSL is describing a low
15		speed service, downstream data rate up to 1.5 Mbps and upstream data
16		rate up to 256 Kbps. The cost structure for this offering does not support
17		special actions by BellSouth to either condition an existing loop or to
18		provide a new loop in order to make ADSL work at a given location. The
19		1.5 Mbps x 256 Kbps offering, referred to as industrial service, is a "best
20		effort", low cost, mass market offering.
21		
22		My reference to BellSouth's business class ADSL is describing a high-
23		speed service with data rates of:

1		• 384 Kbps x 384 Kbps
2		• 768 Kbps x 512 Kbps
3		• 1.5 – 1.8 Mbps x 512 - 768 Kbps
4		• 2-4 Mbps x 640-896 Kbps
5		• 4 - 6 Mbps x 640 - 896 Kbps
6		• 192 Kbps x 192 Kbps.
7		
8		The business class offering will provide network performance levels to be
9		obtained in BellSouth's network and loop conditioning to provide a desired
10		class of service including symmetric and asymmetric data rates.
11		
12		The BellSouth business class ADSL is the comparable service to CLEC
13		loops requiring loop make-up in this docket because performance levels
14		for both are guaranteed.
15		
16	Q.	WHAT IS THE SOURCE OF THE LOOP INFORMATION CONTAINED
17		WITHIN LQS?
18		
19	A.	The database of record for loop make-up information is LFACS. Thus, the
20		source of loop information in LQS is LFACS. However, LQS also utilizes
21		the additional software systems described below:
22		

1		Loop Engineering Information System ("LEIS") - All utilibreita system
2		with several modules, one of which is LEAD.
3		
4		 Loop Engineering Assignment Data ("LEAD") - LEAD is a snapshot of
5		the LFACS database. It receives current data once a month for all wir
6		centers. LEAD is completely updated each month.
7		
8		Hands-Off Assignment Logic - ("HAL") HAL is a BellSouth developed
9		software system designed to pull information from LFACS and join
10		transactions that can not be performed by LFACS, including
11		assignment of most service orders, among which includes
12		assignments on ADSL facilities.
13		
14	Q.	IS DIRECT ACCESS TO LFACS OR LEIS/LEAD REQUIRED IN ORDER
15		TO PROVIDE CLECS WITH DETAILED INFORMATION ABOUT THE
16		LOOP?
17		
18	A.	No. BellSouth's obligation is to provide requesting carriers the same
19		underlying information that BellSouth has in any of its own databases or
20		other internal records ³ . BellSouth's mechanized OSS interface and
21		manual interface provides a means to submit either a mechanized LMU
22		pre-order query or a manual LMU Service Inquiry ("SI") to LFACS and

³ CC Docket 96-98, paragraph 427, page 193, released November 5, 1999

1		receive a response. In the case of LEIS/LEAD, access may be obtained
2		by CLECs for LQS which provides a "yes/no" qualified response.
3		
4	issu	e (5) (b) Line Sharing: How and under what rates, terms, and conditions
5		should line sharing be provided?
6		
7	Q.	WHAT PORTION OF THIS ISSUE ARE YOU ADDRESSING?
8		
9	A.	I will discuss BellSouth's implementation of line sharing as it relates to
10		BellSouth's OSS and BellSouth's associated cost of implementation. The
11		issue relating to Line Sharing rates will be addressed by Ms. Cindy Cox.
12		
13	Q.	PLEASE DESCRIBE BELLSOUTH'S APPROACH TO DEVELOPING
14		OSS FUNCTIONALITY THAT WILL ELECTRONICALLY PROCESS LINE
15		SHARING SERVICE REQUESTS.
16		
17	A.	The vendor solution provided by Telcordia Technologies, Inc. previously
18		described for CLEC xDSL pre-ordering and ordering functionality also has
19		a module to provide the OSS necessary for the pre-ordering, ordering and
20		provisioning of Line Sharing service.
21		
22	Q.	PLEASE SUMMARIZE THE BENEFITS OF THE TELCORDIA SOLUTION
23		FOR LINE SHARING TO BELLSOUTH AND ITS CLEC CUSTOMERS.

1		
2	A.	In addition to those benefits previously described, the Telcordia solution
3		offers electronic processing of Line Sharing service requests allowing
4		flow-through within BellSouth's OSS. This includes the ability to inventory
5		and assign BellSouth facilities and splitters at the pre-specified CLEC
6		meet points. These capabilities provided by the Telcordia solution
7		translate into reliable, fast and accurate processing of CLEC Line Sharing
8		service requests. It provides state-of-the-art technology with the ability to
9		process the anticipated volumes of requests in a cost-effective manner
10		and to build future applications and functionalities.
11		
12	Q.	IS THE SCOPE OF WORK THAT IS TO BE PROVIDED BY TELCORDIA
13		EXCLUSIVELY FOR CLEC OSS CAPABILITIES ASSOCIATED WITH
14		THE CLEC XDSL AND LINE SHARING?
15		
16	A.	No. The majority of the work done in this effort is for OSS capabilities
17		associated with CLEC xDSL and Line Sharing orders; however, Telcordia
18	•	is performing additional work on Electronic Access Ordering ("EAO")
19		functionality. EAO will provide ASR pre-order functionality for address
20		validations and Connecting Facility Assignment ("CFA") inquiries.
21		Approximately \$3.2 million is committed for licensed software Right-to-Use

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fees associated with EAO.

22

23

1	Q.	WHAT IS THE CURRENT VALUE OF THE SOFTWARE AND SERVICES
2		SCOPE OF WORK THAT WILL BE PERFORMED BY TELCORDIA FOR
3		BELLSOUTH IN THE LINE SHARING EFFORT?
4		
. 5	A.	The software and service fees total approximately \$41,000,000 for the
6		Line Sharing software and services provided by Telcordia Technologies,
7		Inc. This does not include the approximate \$3,200,000 for software fees
8		described previously for EAO functionality.
9		
10	Q.	BASED ON CURRENT PLANS WHEN WILL ELECTRONIC PRE-
11		ORDERING AND ORDERING CAPABILITIES BE AVAILABLE UNDER
12		THE TELCORDIA SOLUTION?
13		
14	A.	As previously stated with the pre-ordering of xDSL, the deployment for
15		pre-ordering of Line Sharing is planned for mid-to-late November 2000.
16		Firm Order Line Sharing utilizing the vendor supplied solution by Telcordia
17		does not yet have a firm deployment schedule established. In cooperation
18		with the CLEC Line Sharing collaborative teams, BellSouth has
19		implemented an interim solution in the existing OSS utilizing the Local
20		Exchange Service Order Generator ("LESOG") to allow mechanized firm
21		ordering of CO-based BellSouth-owned splitter Line Sharing. This interim
22		solution was implemented for the production environment on September
23		30, 2000. This interim solution will be supplemented and replaced utilizing

1		the Telcordia solution in mid-to-late 2001. BellSouth plans to also offer
2		mechanized firm order of CO-based CLEC owned splitter Line Sharing
3		and Remote Line Sharing. These products are being developed jointly in
4		the Line Sharing Collaborative teams and will be mechanized as they are
5		developed.
6		
7	Q.	DOES THIS CONCLUDE YOUR TESTIMONY?
8		
9 10	A.	Yes.
1 2		
12		



EXCEPTION 9

BellSouth OSS Testing Evaluation

November 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the initial interview of BellSouth personnel for CLEC Training (PPR4).

Exception:

BellSouth does not have documented procedures for CLEC training management practices and program administration. (PPR4)

Background:

The BellSouth Start-Up Guide' states:

 BellSouth offers training courses to CLECs to help them interface efficiently with BellSouth. The classes are designed to aid the CLEC's understanding of the CLEC/BellSouth relationship and the procedures and services involved.

BellSouth Professional Training Services personnel² state:

 The objective of the CLEC Training function is to provide quality training in order for CLECs to be able to process orders manually and/or to utilize the Operational Support System (OSS).

Issue:

During interviews with members of BellSouth Professional Training Services, KPMG Consulting found that BellSouth does not have documentation for the following items:

- Descriptions of the roles and responsibilities of the Senior Manager in charge of Professional Training Services and the Professional Training Services Coordinator.
- 2. Procedures defining the scope and objectives of the training process.
- 3. Procedures for accepting CLEC input regarding training curriculum.
- 4. Procedures for publishing information about training opportunities.

¹ The Bell-South Start-Up Guide is located at

http://www.interconnection.bellsouth.com/guides/activation/pdf/startup2.pdf, Version 1.1, 7/27/2000, Section 9.0, page 97.

² Initial Interview of Professional Training Services personnel conducted 9/20/2000.



EXCEPTION 9

BellSouth OSS Testing Evaluation

- 5. Procedures for addressing errors and exceptions in training events and materials.
- 6. Procedures to monitor and ensure the quality of training, which include:
 - a. Surveying training recipients on the effectiveness of training.
 - b. Responding to feedback about training quality.
 - c. Monitoring instructor performance.
- 7. Procedures to track utilization and attendance of training tools and forums.
- 8. Procedures to ensure that training offerings are scalable in response to additional demand.

Without clear and complete documentation of operating procedures, BellSouth cannot ensure consistency and repeatability of the training process.

Impact:

CLECs may experience inconsistent levels of training or training support from BellSouth Professional Training Services. The lack of a consistent and repeatable process could impede the ability of CLECs to effectively train their staff and ultimately impact the quality of service provided to their customers.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 9



FL OSS TEST Exception #9

December 5, 2000

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² Initial Interview of Professional Training Services personnel conducted 9/20/2000.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 9

- 3. Procedures for accepting CLEC input regarding training curriculum.
- 4. Procedures for publishing information about training opportunities.
- Procedures for addressing errors and exceptions in training events and materials.
- 6. Procedures to monitor and ensure the quality of training, which include:
 - a. Surveying training recipients on the effectiveness of training.
 - b. Responding to feedback about training quality.
 - c. Monitoring instructor performance.
- 7. Procedures to track utilization and attendance of training tools and forums.
- 8. Procedures to ensure that training offerings are scalable in response to additional demand.

Without clear and complete documentation of operating procedures, BellSouth cannot ensure consistency and repeatability of the training process.

Impact:

CLECs may experience inconsistent levels of training or training support from BellSouth Professional Training Services. The lack of a consistent and repeatable process could impede the ability of CLECs to effectively train their staff and ultimately impact the quality of service provided to their customers.

BellSouth Response:

We have established Methods and Procedures for all of the above items stated. These M&Ps are provided as a separate document.

Documentation Procedures for CLEC Training Management Practices

Question: Roles and responsibilities of the Senior Manager in charge of			
Pro	Professional Training Services and the Professional		
Training Services Coordinator.			
Step	Action		
1	Hiring all Instructional Designers and Trainers for CLEC		
	training.		
2	Tracking and measuring all revenue and expense for		
	Professional training Services.		
3	Measuring return on investment.		
4	Measuring demand for classes and filling that demand.		
5	Measuring results of pre and posttests.		
6	Taking CLEC input and making sure that suggestions and		
	improvements are implemented in the training classes.		
7	Tracking instructor evaluations and pre and post tests via		
	Access.		
8	As new procedures and software are implemented Training		
	Coordinator ensures that training material is modified		
	accordingly or new classes are added to accommodate for the		
	new procedures.		

Question: Scope and objectives of the training process		
Step	Action Action	
1	To provide quality training in order for CLECs to be able to	
	process orders manually and/or utilize the Operational	
	Support System (OSS).	
2	Train all CLECs who we identify in the market place to help	
	them be able to interface efficiently with BellSouth.	
3	Aid the CLEC's understanding of the CLEC/BellSouth	
	relationship and the procedures and services involved.	
4	Define volume and term training deals.	
5	Set up web based and instructor lead classes for those new	
	CLECs entering into the market place.	
6	Design classes to make the CLEC a better more capable	
	competitor in the market place.	
7	Share BellSouth knowledge and know how with the CLEC	
	community.	

Question: Procedures for accepting CLEC input regarding the training		
curriculum		
Step	Action Action	
1	CLEC Inforum-CLECs asked to fill out cards asking for their	
	ideas on improvements and for suggestions on classes we	
	need to add or modify.	
2	Instructor evaluations are given at the end of each training	
	class asking CLECs to rate the class on specific measures and	
	give their input on pre-determined questions. These	
	evaluations are read by instructors and Senior Manager and	
	results are put into a database.	
3	Ongoing Return on Investment studies are conducted where	
İ	CLECs are called by phone and asked for their opinions and	
	input.	
4	Attendance at several CLEC trade shows to provide	
	information on our program as well as receive information for	
	improvements and new ideas for the CLEC community.	

Question: Procedures for publishing information about training		
opportunities		
Step.	Action Action	
1	All CLEC classes are published on the web. This includes	
	class description, available dates, and pricing.	
2	Literature is produced that describes each class in detail	
	stating specific course objectives, time frames, and pricing.	
3	CLEC Inforum is done twice a year to educate CLECs on	
	services that we offer and new enhancements in doing	
	business with BellSouth.	
4	The web is kept current with class offerings and web-based	
	classes.	
5	Send out flyers when new classes are established.	
6	Interviews and articles are done in our CLEC quarterly.	

Question: Procedures for addressing errors and exceptions in training events		
and materials		
Step.	Action	
1	Instructional Designers make any necessary changes to the	
	training material including correcting errors and making	
	updates.	
2	SME's review all documentation before it is put into training	
	material and taught in the classroom.	
3	Regulatory issues and any requests for future directives are	
	many times fielded by the Training Coordinator who then	
	passes them on to the proper instructor or if needed the	
	Manager of Professional Services	

Question: Procedures for monitoring and ensuring the quality of training which include:

- surveying training recipients on the effectiveness of training
- responding to feedback about training quality

• monitoring instructor performance

monitoring instructor performance		
Step	Action	
1	Level One evaluations asking for input on material, classroom	
	and instructor are handed out at the end of each class. These	
	are then read by instructor and keyed into a database.	
2	Pre and posttests are given at the beginning and end of each	
	class to specifically measure the amount of participant	
	learning that occurred. These pre and posttests are then	
	averaged for each class and average pre and posttest measures	
	are tracked in our database.	
3	Training Coordinator can tell by these pre and posttest score	
ļ	averages for each class if there are problems that need to be	
	addressed. If these scores are not consistent with past	
	averages instructor evaluations are looked at even more	
	closely to help determine what the problem is so it can be	
	corrected.	
4	Pre and posttests along with instructor/class evaluations	
	greatly aid in helping us make decisions about what new	
	developments and new customer markets need to be	
ĺ	addressed in training. They also help us determine if training	
	is meeting the CLECs needs in the field.	
5	Training coordinator occasionally sits in on the classroom and	
	measures effectiveness of materials and trainer.	

Question: Procedures to track utilization of training tools and attendance		
at forums		
Step	Action -	
1	Information for registration is found on the web and the	
	CLEC then calls the Training Administrator to register for	
	their desired class.	
2	If there are not enough students signed up for a class or if a	
	class has to be cancelled, these participants are called	
	personally and reassigned to another class date.	
3	Instructor receives a print out of all that signed up for their	
	particular class. Instructor takes attendance and the actual	
	attendee's names are sent back to the training coordinator.	
4	At the CLEC Inforum participants are requested to give	
	feedback on classes they would like to see offered or any	
	feedback or suggestions for improvement that they would like	
	to see implemented. Attendance at these inforums is kept and	
	CLECs are invited back for subsequent ones in the future.	
5	As on January 1, 2001, TAFI, LENS, and CLEC Basic will be	
	offered via the web. For these specific classes, CLECs can	
	register and complete courses via the web and not be required	
	to interact with our Training Coordinator.	

Question: Procedures to ensure that training offerings are scalable in			
res	response to additional demand		
Step	Action Landson		
1	Demand and attendance records are kept by the Training		
	Coordinator. If a class fills up quickly, then others are added		
	according to demand.		
2	The number of requests determines demand. For instance, at		
	the CLEC Inforum we get feedback requesting us to focus on		
	the development of specific areas.		
3	Instructors receive feedback in the classroom and while		
	suitcasing classes at customer locations. Decisions for new		
	development are many times based on this feedback		

© BELLSOUTH

Originations advaged to teace CR agen.
5 1.00 Provided RNI response to prighout.
Intraview. Originator advised to leave.
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Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives

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Docket No. 000731-TP JMB-R19 Page 5 of 29

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

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(4/00) Change Request Lng

12/20/2000	JMB-R19 Page 8 of 29	Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives		60
	Docket No. 000731-TP		hvolid file on CSR 12/12/200 12/13/00 NVA NVA 12/12/00 12/15/00	30242
12/14/00 - Bell-South annioned legent Server upgrades to the CLEC community to address LENS outlope problems. Not clossified as a "defect" response		12/1400	[ENS Guath of Service 12/11/00 12/12/0	N 6220
17/11/70 - Defermine to be a defect and withe taggeted for a Juhure telease		1371/00	Modify Dae Date Calculation module for process RECHYP Mg or 0 6 JANE Poduct (RSS) 12/08/00 12/11/00 N/A N/A 12/11/00 12/14/00	V V
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11(0)(0) Determined to be a defect and will be corrected in a yet to be determined telegase.			errac or UNA-G when ON 1100100 1100100 N/A N/A 11/01/00 11/06/00	N 01207
11/23/00 - Determined to not be a defect. Walting on ariginator to authorized closure		00/82/01	Sup in core at Defect 1 10/18/00 10/19/00 NA NA 10/18/00 10/23/00	70202
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6/15/00 Need additional Information from programme 7/10 Not adelect. Watting on principal to dots		00/1/00	ECO FCRAING TO EDIT	N 96009.
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Implemented Change Requests 1999 - 2000

Title Date

December 2000

12/18/2000 CR0236 - Incorrect Calculation of Due Date Intervals for PIC/LPIC

12/18/2000 CR0226 - Calculate Correct Due Date Intervals

12/18/2000 CR0193 - TAG Hardware/Software upgrade to UNIX 11.0 Platform

12/12/2000 CR0211 - Different Information displayed on TAG than LENS

12/12/2000 CR0194 - Missing Interval Guide for Port/Loop Combos

12/11/2000 CR0216 - NPORD Date for FOC (Issue 7)

12/11/2000 CR0230 - NPORD Defect

12/11/2000 CR0219 - Due Date Intervals for LNP with Loop (REQTYP BB)

12/11/2000 CR0091 - Add DFDT to the FOC

12/11/2000 CR0068 - Pipe Cross USOC

12/08/2000 CR0131 - Split Billing Requests

November 2000

11/21/2000 CR0224 - Invalid error message on REQTYP M for Line class of Svc

11/21/2000 CR0214 - Documentation error on 2 wire UNE-P Bus/Res/PBX document

11/20/2000 CR0204 - LESOG Not Processing REQTYP JB/ACT=A Correctly

11/20/2000 CR0203 - LESOG Should Allow Manual Handling Instead of Auto-Clarifying

11/20/2000 CR0045 - Strip Non-Resellable USOCs

11/20/2000 EDI020900_001 - Electronically Order Routing to OS/DA

11/14/2000 CR0162 - OTN Defect Issue 7

11/14/2000 CR0148 - LESOG not recognizing disposition of addl/foreign listing

11/14/2000 CR0136 - Address validating in LENS but not in TAG - Old RSAG

11/14/2000 CR0126 - LESOG not pulling the correct CFN number for enhanced $\ensuremath{\mathbf{MMC}}$

11/14/2000 CR0108 - Listings over the number of 2 not shown on LSR or order

11/14/2000 CR0073 - LEO not pulling Ported Number on FOC/CN

11/14/2000 CR0024 - LOCNUM = HT = TN not found on CSR or LSR

October 2000

10/27/2000 CR0191 - Suppress the premise visit indicator

10/27/2000 CR0188 - Release 7.1 Caused Defects

10/26/2000 CR0205 - Listing Order Defect

10/23/2000 CR0150 - Add NPT Data Element to the ESDQ Query

10/23/2000 CR0147 - Seasonal Suspend

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10/16/2000 CR0187 - LESOG should recognize street directional for validation
10/16/2000 CR0167 - Incorrect Circuit # on FOC
10/16/2000 CR0163 - LESOG should not bring over FIDS on line USOCs
10/16/2000 CR0109 - GA 912/229/478 NPA Splits
10/10/2000 CR0134 - TN Reservation Display of Switch CLLI
10/10/2000 CR0106 - Delay Sunset of LSOG 2 XDSL Ordering via Fax
10/06/2000 TAG011700_001 - Migration As Specified for OSS99
10/06/2000 CR0125 - Change order to add a VCA and RJ11C in LENS
10/06/2000 CR0124 - LESOG to cancel N&D if unsuccessful in generating both
10/06/2000 CR0102 - NUM = TELNO = ACCT is Final Reject
10/06/2000 CR0089 - TN Reservation via LENS
10/06/2000 CR0081 - LESOG Populating incorrect due date interval
10/09/2000 CR0061 - Implement NC Overlay for 704/980
10/09/2000 CR0060 - Implement Kentucky NPA Split (606/859)
10/02/2000 CR0153 - Electronic Ordering of CO Based Line Sharing
10/02/2000 CR0129 - LESOG Failing to apply ZRTI to Orders
10/02/2000 CR0118 - Remove Housenumprefix for TAG API 2.2.0.10
10/02/2000 CR0116 - Premise Visit Indicator
10/02/2000 CR0115 - Partial Pre-Order Query Due Date Calculation
10/02/2000 CR0112 - Conversion As Is-ACT W Defect
10/02/2000 CR0159 - Documentation Discrepancies in BBR-LO Issue 9G
10/02/2000 CR0117 - Update TAG Issue 7 Map Due Date Calculation Tables
August 2000
08/29/2000 CR0092 - DFDT & CHC
08/29/2000 CR0077 - Subscription Version Cancellations
08/29/1999 LSR0623990001 - Workflow Mechanization
08/22/2000 CR0119 - LESOG Auto-Clarifying NUM=TELNO=TN not in CRIS
08/22/2000 CR0047 - Display Enhanced MemoryCall Access Number in LENS
08/16/2000 EDI0812990001 - EDI Ordering for Unbundled xDSL Loops
08/16/2000 TAG0812990002 - Pre-Order Loop Inquiry
08/14/2000 CR0076 - Generate Port Side of Order when Adding Line
08/14/2000 CR0075 - LESOG is Clarifying for 1MBFE in Error
08/14/2000 CR0071 - ECCKT data on FOC/CN
08/14/2000 OSS011300_001 - Migration as Specified for OSS99
08/07/2000 CR0084 - TAG 2.2.0.8 Security Exception Error Defect
08/03/2000 CR0062 - ReqTyp P/TOS 2nd Char of E
July 2000
07/28/2000 CR0067 - Call Return Invalid with Class of Service USOC UEPRX
07/12/2000 CR0022 - Flow Through Matrix
June 2000
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 06/17/2000
 CR0060 - Implement Kentucky NPA Split (606/859)
 Docket No. 000731-TP

 06/16/2000
 CR0084 - TAG Unknown Security Exception Types
 JMB-R19

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May 2000

05/23/2000 CR0054 - Versioning Defect 5.23.00 05/07/2000 CR0006 - YPQTY WPQTY

April 2000

04/30/2000 CR0007 - VER Field on Rejected LSRs for LNP

04/29/2000 CR0019 - ECCKT Defect

04/18/2000 CR0024 - Hunt Group Defect on a Separate CSR

04/18/2000 CR0011 - LENS Directory Defect

04/15/2000 CR0026 - NC Code not populating on Tag Loop Order

March 2000

03/23/2000 CR0004 - Line Class of Service

03/01/2000 CR0001 - Room Field Defect

February 2000

02/03/2000 ALL020900_002 6 - Character Yellow Page Heading (YPH) Code

1999

12/1999 TAG0907990001 - TAG Pre-Order Doc Enhancements 08/12/1999 LEO812990001 - Error Code List Note Modification

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2000 Change Requests

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Date Title

December 12/18/2000 CR0247 - Reduce Due Date Interval from 5 to 4 days for SL1 in TAG 12/18/2000 CR0246 - LENS/TAG - Ability to view resold/UNE-P CSRs 12/18/2000 CR0245 - LENS/TAG/EDI Manual vs Mechanized Notification 12/18/2000 CR0229 - Enhance Address Validation in LENS/TAG to Allow Creating New 12/18/2000 CR0225 - Notes Added to the LACT Field in the BBR 12/18/2000 CR0215 - UNE to UNE Bulk Migrations 12/14/2000 CR0244 - Establish Standard Call Center Measurements 7 Reports for LCSC 12/14/2000 CR0243 - Class of Service 12/12/2000 CR0221 - Allow User To Populate LQTY in Lens 12/12/2000 CR0242 - Invalid TNs on CSR Defect 12/12/2000 CR0241 - CN returned on incorrect LSR version 12/12/2000 CR0240 - LENS Line Class of Service Defect 12/12/2000 CR0239 - LENS Quality of Service Defect 12/12/2000 CR0238 - Provide Separate E-Mail Notification Lists for System Outages 12/12/2000 CR0237 - Modify Due Date calculation mod to process RECTYP M as UNE 12/12/2000 CR0236 - Incorrect calculation of Due Date intervals for PIC/LPIC 12/12/2000 CR0233 - RORD field in LEO listed as unused 12/12/2000 TAG8120003 - Parsed CSR 12/11/2000 CR0218 - EDI Map Change for Error Text 12/11/2000 CR0201 - Extension of the retirement of TAG 3.1.1.1 12/11/2000 CR0186 - Interactive Agent TCIP/SSL 12/11/2000 CR0177 - Support Value="D" for Response Type Request (RTR) TAG 12/11/2000 CR0143 - Notification - MDR (Mechanized Disaster Reports) 12/08/2000 CR0015 - ACT of C - Change Basic Class of Service 12/08/2000 CR0014 - Change LENS Screen-"Number of Features to Add/Change/Delete" 12/05/2000 CR0183 - TAG to display TTRA in IDENT Section for Number Pooling

12/05/2000 CR0014 - Change LENS Screen on Features/Services Section

12/04/2000 CR0235 - Notification to CLECS When A Number Has Been Posted in Error

12/04/2000 CR0234 - Connect Direct Fix

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12/04/2000 CR0232 - Alteration to Business Rules 12/04/2000 CR0183 - TAG display the TTRA in unfielded IDENT Section 12/01/2000 CR0228 - Provide Business Rules for REQTYP M and E. ACTTYP T November 11/27/2000 CR0223 - LENS ACT of V Defect 11/21/2000 CR0227 - Stop auto-clarifying on REQTYP M from Resale acct w/MAN FID 11/21/2000 CR0226 - Calculate Correct Due Date Intervals 11/21/2000 CR0223 - LENS ACT of V Defect 11/20/2000 CR0222 - Unknown USOCS 11/20/2000 CR0209 - Changes to CCP User Registration Form 11/20/2000 CR0078 - Extended Loops (EELS) 11/20/2000 CR0003 - RPON Flow-Through & Electronic Reject 11/20/2000 EDI1215990001 - TN vs RSAG Validation 11/16/2000 CR0207 - Extension of TAG 3.1.1.1 Sunset Date 11/13/2000 CR0218 - EDI Map Change for Error Text 11/13/2000 EDI030300 001 - CLEC Test Environment 11/10/2000 CR0184 - Lens-Ability to View Resold CSR's 11/08/2000 CR0213 - LENS/LCSC discrepancies on Directory Listings 11/08/2000 CR0211 - Different information displayed on TAG than LENS 11/08/2000 CR0210 - LENS generating an error on LNA=G when OTN is populated 11/08/2000 CR0208 - TAG 2.2.x not processing Digital Loop Orders 11/08/2000 EDI1215990001 - TN vs RSAG Validation 11/07/2000 CR0176 - Allow PIC & LPIC to be Submitted as "No Change" 11/07/2000 TAG0812990001 - Provide CFA via Pre-Order 11/06/2000 CR0201 - Extension of the Release of TAG 3.1.1.1 11/06/2000 CR0196 - Allow Changes in Directory Deliveries - LENS99 October 10/27/2000 CR0190 - RSAG Address vs. CSR Address 10/27/2000 CR0130 - LESOG not responding to "C" order adding line & features 10/27/2000 CR0110 - LESOG not populating ZNEA & ZNHC on ACT of N or C 10/27/2000 CR0050 - LENS 6.3 - # of directories for white & yellow pages 10/27/2000 CR0181 - Add Grid Values for Disconnect Nbr Field in TAG 10/27/2000 CR0180 - API Reference Guide Recommendations-CLEC Notif 10/27/2000 CR0179 - TAG Navigator to CORBA Bridge 10/27/2000 CR0178 - Provide Solicitated Notifications in TAG 10/26/2000 CR0206 - LNP Qualifier Defect 10/24/2000 CR0040 - Order Tracking Request 10/24/2000 CR0038 - TOS Field on RegTyp J 10/24/2000 CR0029 - Partial Migration of UNE Loops 10/24/2000 CR0016 - SI Enhancement for SL1, SL2, DS0, DS1 and ISDN 10/24/2000 CR0002 - Pre-Order/Order Business Rule Discrepancies Docket No. 000731-TP 10/24/2000 EDI0812990007 - Use of LEAN/LEATN Fields JMB-R19 10/24/2000 EDI0812990005 - Handling of Remaining Service Page 13 of 29

10/24/2000 EDI0812990004 - Change Main Account Number

10/23/2000 CR0194 - Missing Interval Guide for Port/Loop Combos (UNE-P)

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10/23/2000 CR0151 - Error Code Defect
10/23/2000 CR0135 - Merging of Accounts
10/16/2000 CR0165 - Discrepancies in BellSouth Guidelines - LNUM Field on Loop
            Service Page
10/16/2000 CR0143 - Notification of Mechanized Disaster Reports
10/12/2000 CR0198 - Increase Transaction Size Limit
10/10/2000 CR0197 - Remove LOCNUM from LNA Charts in the BBR-LO
10/09/2000 CR0104 - Lens Large Account Inquiry
10/06/2000 CR0020 - View Multiple CSRs Simultaneously
10/05/2000 CR0139 - Update TAG API to Better Relate to Pre-Order Rules
10/05/2000 CR0053 - Improvements to the BBR-LO
10/05/2000 CR0160 - Flow Through for ReqTyp BB, ACT P & Q for Loop w/LNP
10/05/2000 CR0149 - Modify & Resend FOCs & Clarifications
10/05/2000 CR0137 - Flow Through for ReqTyp CB, ACT P & Q for LNP
10/05/2000 CR0096 - LENS Enhancement - Add New Listings
10/05/2000 CR0088 - Mech of Unbundled Network Terminating Wire (UNTW)
10/05/2000 CR0085 - Web-based LSR
10/05/2000 CR0031 - Ability to Change Listing Account in LENS
10/04/2000 CR0171 - Baseline Change Control Document
10/03/2000 CR0127 - Provide Pending Service Order for CSR via TAG
10/03/2000 CR0113 - LENS Inquiry - View Customer Record
10/03/2000 CR0101 - EDI Pre-Ordering
September
09/28/2000 CR0152 - Electronic Ordering of Payphone Service Orders
09/28/2000 CR0146 - Default the Listed TN
09/28/2000 CR0145 - Remove a Tn from a LENS LSR
09/28/2000 CR0144 - Add LSR Codes in LENS
09/26/2000 CR0166 - Cable ID Defect
09/25/2000 CR0169 - Number Conservation Rules for Number Pooling
09/25/2000 CR0030 - UNE to UNE Migrations
09/18/2000 CR0158 - Already pending error message on LSRs
09/18/2000 CR0157 - Need to handle HTG USOCs for all calling plans on Port/Loop
            Combos
09/12/2000 CR0132 - Fielded Completion
09/07/2000 CR0133 - Migration OF UNE-P
09/07/2000 CR0105 - Drop the RES ID Requirement For xDSL Order
09/04/2000 CR0154 - Missing Completion Notices Defect
August
08/28/2000 CR0142 - Remove business reference for RCFRE, RCFRF, RCFRG, RCFRN in LEO-IG
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08/17/2000 CR0128 - Loop/Port Combo for Res/Bus Lines
                                                                           JMB-R19
08/09/2000 CR0080 - LESOG Failing to issue Port Loop Combo correctly
                                                                         Page 14 of 29
July
07/28/2000 CR0100 - TAG Failing to accurately calculate Due Dates on Deny/Restor
07/28/2000 CR0111 - UNE Cannot Generate Class of Svc. USOC Error
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07/17/2000 CR0099 - Order MA'd and Service Order Info Deleted

07/17/2000 CR0098 - Re-Calculate Due Date Intervals

June

06/29/2000 CR0012 - TAFI Functionality via ECTA Interface

06/27/2000 ORD030200_001 - UNE VIA ASR21

06/20/2000 CR0079 - TAG Requiring INIT on ReqType A

06/20/2000 CR0074 - TAG Requiring enduser address in error

May

05/19/2000 CR0049 - LENS TNs on Bulk Orders

April

January

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Be'lSouth ⊶ Interconnection



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December 2000

12/18/2000 CR0156 - Connect: Direct Request

12/12/2000 CR0065 - LENS 6.3 Tutorial

12/11/2000 CR0217 - CSR With 888 USOC

November 2000

11/27/2000 CR0231 - Inability to view order statuses for UNE-P Conversions in CSOTS

11/16/2000 CR0192 - Pre-Order/Firm Order Data Element Inconsistencies-TCIF 9

11/15/2000 CR0059 - 45 day TN Reservation

11/14/2000 CR0212 - Response on Size Limitation Limit

11/14/2000 CR0202 - Sup to Cancel Defect Request

11/14/2000 CR0185 - TAG/COF Lead Project Mgr Role Change Request

11/14/2000 CR0175 - TAG CLEC Test Environment Application Support

11/14/2000 CR0174 - CR LOG - Reference to Application and Release Number

11/14/2000 CR0173 - Tables in BBR-LO Ref Applicability to TAG Releases

11/14/2000 CR0023 - OSS'99 Ordering Guidelines

11/14/2000 CR0008 - YPQTY/WPQTY (Iss 7) REQTYP E Reject Code must be 2 numerics

October 2000

10/27/2000 CR0093 - Electronic Change Notifications

10/25/2000 CR0095 - ECTA-Attribute Validation

10/16/2000 CR0123 - LENS Application Enhancement

10/16/2000 CR0107 - Documentation Defect

10/16/2000 CR0070 - Call Forwarding USOC Defect

10/16/2000 CR0066 - Invalid USOC for Basic Class of Service / CREX7/TN

10/16/2000 CR0051 - LENS application defect

10/16/2000 CR0039 - FOC not populating order number on Port Order

10/16/2000 CR0018 - USOC Segmentation Request

10/10/2000 CR0087 - "C" Order Process for UNE-P

10/09/2000 CR0138 - Fielded Completion Notices

10/09/2000 CR0027 - Displaying Directory Information on FOC

10/09/2000 CR0044 - LENS Application Enhancement

10/06/2000 ORD032700_001 - Post-FOC Clarification

10/06/2000 CR0155 - Ringmaster Defect

10/06/2000 CR0121 - Discrepancies in BellSouth Guidelines - CG LSOR-002

10/06/2000 CR0120 - SOCS RT60 Invalid NPA NXX for Routing Sub 001

10/06/2000 CR0114 - TN Reservation Defect

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- 10/06/2000 CR0103 Disconnect of Port Loop Combo going into RECYCLE 10/06/2000 CR0097 - LENS Defect 10/06/2000 CR0072 - LEO not pulling BAN1 from the SO 10/06/2000 CR0013 - Date Sent/Century Defect (EDI) 10/06/2000 CR0056 - Invalid Sup, Subscription version defect September 2000
- 09/11/2000 CR0033 EDI Multiple ReqTyp Enhancement 09/07/2000 CR0140 - Update the Due Date Calculation Tables

August 2000

08/04/2000 CR0046 - EDI Reject Process Modification 08/01/2000 CR0052 - WSOP Field Requirements

July 2000

- 07/28/2000 EDI0812990002 Pre-Order Digital Loop Qual. EDI & TAG
- 07/28/2000 EDI0812990006 Mechanization of XDSL Loops
- 07/28/2000 SOTO11200_001 Remarks Section Added to Svc. Order Tracking System
- 07/28/2000 TAG030900_001 LNA of V Functionality Pre OSS'99
- 07/28/2000 EDI030200_001 Modify Line Activities to Align with Industry Guidelines
- 07/28/2000 CR0005 TAG Pre-Order Test
- 07/28/2000 CR0009 Expand CLLI Code in the AVQ in TAG Pre-Order
- 07/28/2000 CR0010 TAG Pre-Order unstable results
- 07/28/2000 CR0017 Invalid TOS
- 07/28/2000 CR0025 Clarification on ATN Usage Rules
- 07/28/2000 CR0028 LSO2 & LSOG 4 Differences
- 07/28/2000 CR0032 TR Reservation
- 07/28/2000 CR0034 Act. Code "T" (EUMI Field)
- 07/28/2000 CR0035 One Page Sup for DD Changes
- 07/28/2000 CR0036 Transfer of Call Options INP REQTYP B
- 07/28/2000 CR0037 Introduction of AIN Internet Call Waiting
- 07/28/2000 CR0041 Documentation of Interface Changes and Releases
- 07/28/2000 CR0042 Open IWBAN Field on the EU Form
- 07/28/2000 CR0043 Conversion As-Is Error Invalid USOC
- 07/28/2000 CR0048 Fields that cannot be changed on a Supp.
- 07/28/2000 CR0057 EDI Issue 9 PON Cancelled on Port/Loop Combo
- 07/28/2000 CR0058 Fraud Management Process
- 07/28/2000 CR0063 Memory Call-Forwarding Number
- 07/28/2000 CR0069 Reserving Telephone Numbers
- 07/28/2000 CR0083 Customer Service Record Error Message
- 07/28/2000 CR0086 EELS via ASR
- 07/28/2000 CR0094 TAG6015VAL REFNUM=CFA FORMAT INVALID
- 07/28/2000 CR0103 Disconnect of Port/Loop Combo into RECYCLE

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A BELLSOUTH	The state of the s	VER Field on Rejected LSPs for LNP (AT&1)	LENS Orectory Defect (NextLink)	ECCKT (A181)	Request for New Moths for Issue 9 Ordering Guide (AT&T)	Hurt Group Defect on a Separate CSR (Adelphia) NC Code not	inopulating on TAG loop orders (American Metrocom) Conversion ASIS - TENS	6.3 not stripping non resellable USOCs (One Polnt) Dsoldy Enhanced	MemoryCall Access Number in LENS (One Point)	Verstaning Defect 5 23 00 (AT&T)	Implement Kentucky NPA Split (606/859) (BST)	è o	10S of E to Identify Centrex Services (manual) (BST)	Call Return Invalid with Class of Service USOC UEPRX (AT&T)	Ppe-cross USOC defect (Aith)
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(D) BELLSOUTH	(4/06)	
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Oc should D. & E. v. **Memor CRN **Operation Of States On Obs. 25,000 Obs. 25		87.28.00 - Determined to be a feature and will be tageled for a future relaces (9725/00 - Implemented in Ref. 7.08.12.00
Value 6 moths of the LEO 08/25/00		8/28/07 Determined to be a documentation to documentation defect and consection to impose for the end of Sept 00 11/13/0. 19/29/20 Implemented on 9.29
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Electronic computing Electronic computing		9/4/70 Determined to he a defect and with he corrected in a future release 18D 11/11/100-Implemented in Res 7 Lon 9/29/00
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U.S.G. should recognite U.S.G. should recognite Street discrimination	N/A	Determined to be a detect and targeted for Release 7.2 tent scheduled for 10.14 N/A 00, imp w/Rei 7.2 on 10/14/00
30.88 1 6 Defect (Alib) 10/05/00 N/A N/A 10/05/00 N/A N/A 10/05/00 N/A N/A 10/05/00	N/A	10/6 - Validated as a defect and was N/A corrected on 10/6/00
30191 6 yet indicator (851) 1005/02 1005/02 1005/02 1005/02 1005/03 1005	N/A	Determined to be a feature and was implemented in a IAG software refease N/A on 10,09/00.

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(4/00)	Doc Notes Only Notification On	Change Conto tom teap additional time to monte R724m stersency westing and the R8712m metropled by Belfacut http://mmmmm.event.no.eq.C.(R9715m)	ORIG CLEC RED PLACE ON THOLD/110/C	Thot defect can be concelled 7.26 CLEC Community reviewing internals under Province on	My Man Man Man Man Man Man Man Man Man Man	7/27 Originator has notified BelSouth	rive with to the red form three rought of the particular with 0 through the ballog particular with 0 through through 1/35/70 Orden outs outs better 81 to	With the control of t	9/2) (M - Determined to not be a defect Concreted by ordanotor	connected in a vertical part demanded relations. Werkerchan N. A. 972/00.	Originator authorized to cancel	877/00 Determined to not be a defect Working on originate to determine status	8/22/70 - Re citasiled as a Ferture in 27/21/70 - Re citasiled as a Ferture in 27/21/70 - Advisorate invalid social	9725/77 Conf Coll w/orignotor & 851 9ME. 9727/77 Conning with CR	8/21/17) Due to duplication of requests	
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Change Control Process Release 8.0 Package Meeting

DATE: September 18, 2000

MEETING: Release 8.0 Package Meeting

PURPOSE: Review Proposed Release 8.0 Scope

ATTENDEES

Lorraine Watson - WorldCom	Peggy Rehm - Nightfire	Valerie Cottingham - BST
Sandy Evans, Sprint	Rae Duparw - Mpower	Steve Hancock - BST
Jill Williamson - AT&T	Eric Lee - KPMG	Cheryl Storey - BST
Woody Roe, Albion Connect	Cassandra Daniels - BST	Kimberly Cochran - KPMG
Steve Murray, Rhythms	Mary Ruffin - BST	Brian Rutter - KPMG
Shamone Stapler, ITC- Deltacom	Tyra Hush - WorldCom	James Hunter - KPMG
Mary Conquest, ITC - Deltacom	Frank Burkhalter – Cellular XL	Rick Woodhouse - KPMG
Brenda Files - BST	Kim Gillette – Quintessent	Bill Wahl – KPMG
Kevin McCall - BST	Brenda Jones, BST	Kate Cooper - Eftia

AGENDA

Agenda Discuss Release 8.0 scope, Identify Release Managers and discuss disposition of non-

scheduled change requests

Opening

The BCCM opened the meeting and covered the items we were to accomplish on this conference call:

- Discuss scope for Release 8.0, which is targeted for 11/18/00
- Identify Release Managers
- Discuss disposition of non-scheduled change requests
- Purpose of 9/27 Change Review Meeting

Proposed Release 8.0 & 8.1 Scope

At the 6/28/00 Change Review Meeting, pending change requests were ranked to obtain input for Release 8.0. The final ranking was provided to BellSouth IT to perform analysis, impact, sizing and estimating activities. Based on capacity and resources, the following proposed release 8.0 scope was developed and distributed to the CLEC community:

Release 8.0 - Target Implementation Date 11/18/00

CR0030 - UNE to UNE Migrations

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"

Release 8.1 Target Implementation Date 12/9/00

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EDI030300_001 CLEC Test Environment

Change Control advised that this is not the final scope for Release 8.0. BellSouth is still pursing the inclusion of additional features in the scope and should have this information by no later than Thursday, September 21.

The BellSouth Release Managers for Release 8.0 are Brenda Jones and Kevin McCall.

Ordering Ranking

The following summary was provided by Change Control regarding the 6/28/00 Ranking for the Ordering Category:

- Rank # 1 CLEC Test Environment Targeted for Release 8.1 on 12/9/00
- Rank # 2 UNE to UNE Migrations Targeted for Release 8.0 on 11/18/00
- Rank #3 Extended Loops to be included with other 319 products targeted for implementation late 2001. Change Control is further investigating if EELS can be worked prior to the other 319 products.
- Rank #4-411 Drops The process for handling 411 drops will be documented. If a listing drops out of 411/DA, CLEC should call the LCSC to report the drop. The LCSC retrieves the LSR to investigate cause of error. If determined to be a BST error, it is corrected immediately, no additional paperwork is required. If CLEC error, CLEC will need to resubmit LSR. The process for handling 411 drops is in parity with our retail operations. Jill (AT&T) mentioned that she was also requesting an electronic means to submit 411 drops in lieu of calling or sending in a spreadsheet (batch). Change Control is in the process of investigating a standard process for CLECs to use to report 411 drops in batch, if they do not want to call the LCSC.
- Rank # 5 RPON Business Rules & Electronic Reject Further defined RPON business rules were provided in the 8/31/00 BellSouth Business Rules-Local Ordering (BBR-LO) update. The CR for RPON (CR0003) was recently modified to also include the functionality of flow-through for RPON'd orders. This is currently being evaluated to

determine if it can be included in Release 8.0 scope.

Rank # 6 - TN vs RSAG Validation - This CR requests BST to relax address validation edits for Changes, Conversions, Suspends, Restores. For non-LNP orders, edits have been relaxed. For LNP orders, the end user information is needed to ensure the end user is within the Toll Message Rate Center (TMRC). Change Control is currently in the process of investigating questions regarding this request from AT&T. The LNP questions should be addressed by the SME at the 9/27 meeting.

Rank #7 - Order Tracking Request - still being considered for Release 8.0 scope.

Rank # 8 – Electronic Order Routing to OS/DA – Targeted for Release 8.0 on 11/18/00. Tyra (WorldCom) questioned the process for requesting OS/DA routing for other CLECs. Jill (AT&T) and Tyra (WorldCom) stated this functionality should not have to be prioritized again for other CLECs. Change Control advised that in the case of selective routing, each individual customer must go through CCP and the process of setting up what they want and how they want it, including whether they want to order it manually versus electronically. Because of the unique characteristics built into what each customer actually may order, that is why it is done on a case-by-case basis. Change Control to address (see Action Items).

Rank # 9 - Handling of Remaining Service - still being considered for Release 8.0 scope Rank # 10 - Partial Migration of UNE Loops - still being considered for Release 8.0 scope

The following Change Requests were added to the proposed Release 8.0 scope because they are not labor intensive:

Rank # 15 - ACT of C - Change Basic Class of Service in LENS

Rank # 16 - Conversion As Is - Strip Non-Resellable USOCs

Rank # 18 - Change Verbiage on LENS Screen

Pre-Ordering

The following summary was provided by Change Control regarding the 6/28/00 Ranking for the Pre-Ordering Category:

Rank # 1 - Parsed CSR - will begin jointly addressing at 10/3/00 conference call. Based on the complexity of CLEC requirements, Parsed CSR could possibly be implemented with Release 10.0 in May 2001.

Rank # 2 - Provide CFA & NC/NCI Codes - need new TAG platform before this CR can be worked.

Rank #3 – SI Enhancement for SL1, SL2, DS0, DS1 and ISDN – need new TAG platform before this CR can be worked.

Rank # 4 - View Multiple CSRs Simultaneously - need new TAG platform before this CR can be worked.

Rank # 5 - Display Enhanced MemoryCall Access Number - Implemented with Release 7.0 on 8/12/00.

A TAG representative will participate in the 9/27/00 Change Review Meeting. BellSouth indicated that Release Management would represent IT at the Change Review Meeting on 9/27/00.

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Documentation	Rank # 1 – Pre-Order/Order Field Discrepancies – (under the Documentation category on the
,	6/28/00 Ranking List—however, this CR will also require a coding change) – still being considered for Release 8.0 scope.
Disposition of	Change Control questioned if the CLECs wanted to change the process of how non-scheduled
Non-	change requests are handled. The former EICCP and the current CCP state that non-scheduled
Scheduled	items go back to Step 4 as Input to the Next Change Review Meeting. The process also reflects the
Change	"PN" status (P1=2 nd time through process). "PN" indicates a CR has reached the Candidate
Requests	Request List, was sized but not scheduled for a release and has cycled through the process N
requests	number of times.
j	It was suggested by the CLECs that BellSouth provide the IT work effort for each change request
	and then the determination could be made as to the disposition of each non-scheduled change request.
	BST committed to have the work effort for IT from Encore by Friday, September 22.
	CLECs also suggested that BST implement more frequent releases.
	文表 1925年最高的社会的英国国家 建设设施 的设施的基础的企业。1925年,
User Requirements	User Requirements for Release 8.0 are targeted for distribution to the CLEC community between the end of September and the 1 st week of October. A conference call will be held to review the user requirements with the CLEC community.
李沙大大道 《张宁	7%。这些 的人的 公司是由,把国际国际中国的国际的国际的国际,国际国际的国际的国际的国际。
9/27/00 CRM	Change Control advised that the purpose of the 9/27/00 Change Review Meeting will not only be
	to prioritize requests for Release 9.0 in January, 2001, but also for Release 10 targeted for the end of May, 2001. Release 9.0 is going to include the Number Pooling mandate, which will be funneling through Change Control. Thus, system capacity may be limited.
Tanadan menerahan dalam dan dan daripa	The Change Review Package will be distributed to the CLEC community on September 20. An amendment will be sent on September 22 after the Release 8.0 conference call.
	<u>。这种主义是国际的特殊的,但是是一种企业的特殊的。但是是一种企业的特殊的,但是是一种企业的企业的。但是一种企业的企业的企业的企业的企业的企业。但是一种企业的企业的企业的</u>
Next Meeting	Our next conference call to continue discussion regarding Release 8.0 scope is Friday, September 22 at 10:00 AM Eastern. The conference bridge is 205/969-4215 access code 9276.
学想到这个	"我们我们我们就是不够是我们的 这个人,我们就是一个人,我们们们也不是不是一个人。"
Action Items	1. Owner – BellSouth
1	OS/DA Routing - Determine process for other CLECs to utilize if interested in selective routing.
	OS/DA Routing - Determine process for other CLECs to utilize if interested in selective routing.
1	OS/DA Routing - Determine process for other CLECs to utilize if interested in selective routing. 2. Owner - BellSouth
1	OS/DA Routing - Determine process for other CLECs to utilize if interested in selective routing.

Docket No. 000731-TP JMB-R20 Page 4 of 4 ----Original Message----

From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com] Sent: Tuesday, December 05, 2000 5:48 PM

To: bhamilton@idstelcom.com; bwellman@idstelcom.com;

david.burley@wcom.com; generalg@cris.com; Jane.Hunter@mail.sprint.com; Mae.Means@mail.sprint.com; rlthompson@xo.com; ronald.l.thompson@xo.com; sangelo@bellsouth.net; SLively@trivergent.com; Tyra.Hush@wcom.com;

wolfsbrg@cris.com

Subject: Tentative Parsed CSR Implementation Schedule

Tentative.txt

Parsed CSR Sub Team,

Attached is the tentative implementation schedule for the Parsed CSR change request. We are working to better the dates if at all possible.

We plan to have the responses to the outstanding action items to you by no later than Friday, December 8.

Just a reminder to let us know by Wednesday, December 6 if you concur with the updated requirements we distributed on 11/21 or if you have any questions/comments. The final CLEC Parsed CSR requirements will be shared with the CLEC community for feedback once the Sub Team has completed their review.

Please let me know if you have any questions.

Thanks,

Cheryl Storey Change Control Team 205-321-2113



TENTATIVE PARSED CSR IMPLEMENTATION TIMELINE

ACTIVITY	TENTATIVE SCHEDULED	ACTUAL COMPLETION
	DATE(s)	DATE
CLEC Requirements Developed	10/3/00 - 11/20/00	11/20/00
CLEC Requirements Completed	11/20/00 - 12/6/00	
CLEC Requirements Distributed	12/7/00 - 12/8/00	
to CLEC Community		
Planning & Analysis Phase	11/27/00 - 04/10/01	
Internal Kick-off Meeting	11/27/00 - 12/1/00	11/27/00
- Project Team P&A	11/27/00 - 12/29/00	
Requirements Phase	11/27/00 - 04/10/01	
Internal Requirements Developed	11/27/01 - 03/30/01	
- User Requirements	01/02/01 - 02/19/01	
- User Requirements BLR	02/20/01	
- System Requirements	2/21/01 - 04/09/01	
Internal Requirements Baselined	04/10/01	
Design Phase	04/11/01 - 06/18/01	
Construction Phase	06/19/01 - 10/01/01	
Internal Testing Phase	10/02/01 - 12/01/01	
Internal Testing	10/02/01 - 11/30/01	
Internal Implementation	12/1/01	
External Testing Phase	12/3/01 - 12/28/01	
Process Implementation	12/31/01	
Project Closeout	01/31/02	

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Bradbury, J M (Jay) - LGA

From:

jrwilliamson@att.com

Sent:

To: Subject: Friday, June 30, 2000 12:53 PM sr271lib@lga.att.com; bradbury@att.com

FW: Mechanization Project



----Original Message----

From: Mcallorum, K P (Kevin), NCAM Sent: Monday, June 12, 2000 9:11 AM To: Williamson, Jill R, NCAM

Subject: FW: Mechanization Project

----Original Message----

From: Beverly.Sheltonwilliams@bridge.bellsouth.com [mailto:Beverly.Sheltonwilliams@bridge.bellsouth.com]

Sent: Friday, June 09, 2000 3:20 PM To: Mcallorum, K P (Kevin), NCAM

Cc: Cheryl.Richardson@bridge.bellsouth.com

Subject: Mechanization Project

Kevin,

Please find attached a copy of the minutes from today's mechanization meeting.

If any changes or additions need to be made, please do so by cob on Tuesday, June 13.

Beverly

BellSouth AT&T Account Team/AT&T Mechanization Meeting June 9, 2000

Attendees:

Kevin McAllorum- AT&T Cheryl Richardson – BellSouth – AT&T Account Tam Beverly Shelton-Williams- BellSouth – AT&T Account Team

Today's meeting was designed to discuss the joint mechanization project between BellSouth's AT&T Account Team and AT&T. For the purpose of this project the subteam will primarily focus on those components associated with the analysis, design, and validation phase.

Kevin will provide a copy of the updated project plan to the Account Team by close of business on Monday, June 12.

Beverly will provide a copy of the flow through matrix for Issue 9 to AT&T by close of business on Friday, June 16.

Bradbury, J M (Jay) - LGA

From: Sent:

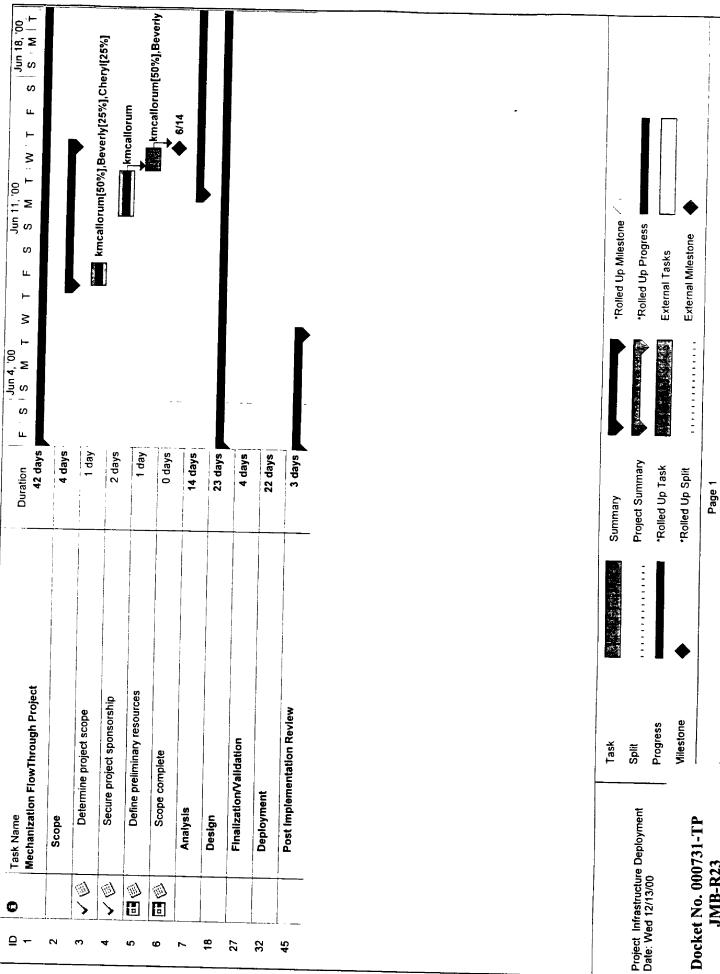
jrwilliamson@att.com Friday, June 30, 2000 12:53 PM

To: Subject: sr271lib@lga.att.com; bradbury@att.com

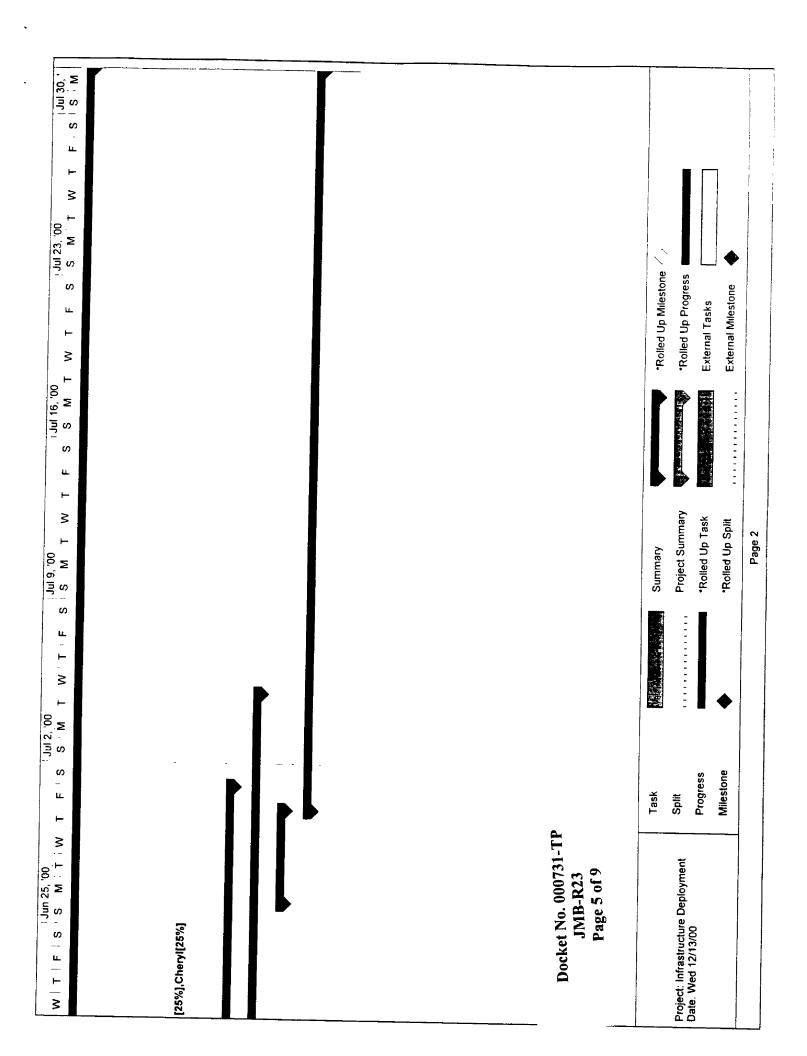
FW.



```
> ----Original Message----
          Mcallorum, K P (Kevin), NCAM
           Monday, June 12, 2000 10:51 AM
> To: Williamson, Jill R, NCAM
> Subject:
 <<FlowThrough Project.mpp>>
> Updated project plan.
> Kevin P McAllorum
> OSS Manager
> AT&T Local Service and Access Management
> (404)810-6923
> 1-800-258-0000 Pin # 2589095
> kmcallorum@att.com
>
```



Page 4 of 9 JMB-R23



Bradbury, J M (Jay) - LGA

From:

jrwilliamson@att.com

Sent:

Friday, June 30, 2000 12:57 PM

To:

gpterry@att.com; edwardgibbs@att.com; crafton@att.com; sr271lib@lga.att.com, bradbury@att.com; eppsteiner@att.com; bettybarrett@att.com; mrule@att.com; ktimmons@att.com; grady@att.com; katherinegrabil@att.com; mlacy@att.com;

bseigler@att.com; vctate@att.com

Subject:

FW: Flow Through Matrix

Importance:

High



All,

Attached is BellSouth's flow-through matrix for OSS'99 (Issue 9). We will use this document to begin facilitating the flow-through of additional order types with BellSouth. If you have any questions, please let us know.

Jill

----Original Message----

From: Beverly.Sheltonwilliams@bridge.bellsouth.com [mailto:Beverly.Sheltonwilliams@bridge.bellsouth.com]

Sent: Friday, June 30, 2000 10:29 AM
To: Williamson, Jill R, NCAM; Mcallorum, K P (Kevin), NCAM

Subject: Flow Through Matrix

Importance: High

Jill and Kevin,

Please find attached a copy of the flow through matrix.

Beverly

Bradbury, J M (Jay) - LGA

From: Sent:

irwilliamson@att.com

To: Subject: Monday, August 02, 1999 12:42 PM augier@att.com; bradbury@att.com; sr271lib@lga.att.com

FW: BST Mechanization Project



As FYI

```
_____
           Williamson, Jill R, NCAM
> From:
           Monday, August 02, 1999 9:58 AM
> Sent:
          Seigler, Bernadette M, NLSOP; Lacy, Michael L, LSOP LSBM; Tweedle,
> Timothy E (Tim), NLSOP; Hill, James S (Jim), NCAM
> Subject: BST Mechanization Project
> I'm working with BellSouth to improve on the mechanization and flow
> through of orders and have developed a matrix to categorize orders. The
> attached sheet is my first draft and I'd like your input prior to my
> sharing it with BellSouth.
> I've attempted to capture all of the types of orders we send or will send
> to BellSouth post OSS'99. I'd like to get as detailed as possible, so any
> corrections or additions you can make would be helpful. I'd appreciate
> your feedback as soon as possible.
>
> Jill
  <<systems mechanization>>
```

AT&T BELLSOUTH MECHANIZATION PROJECT

	Fully	CLEC	CLEC Manual;	CLEC Manual;
	Electronic	Electronic;	Could be Sent	Cannot be Sent
	j	BST Partially	Electronically	Electronically
		Mechanized		
Directory Listing Orders			!	
New Directory Listing	1			
Change Main Listing	2			
Add Additional Listing	1 1			
Delete Additional Listing	1 1			
Delete Listing Account	11			
Delete and Add Additional Listing	1 1			
LNP Orders				
Port a block of 20 DID numbers		1		
Port = 50 TNs</td <td></td> <td></td> <td></td> <td></td>				
Port > 50 TNs				
Full Migration of a BST Account		1		
Partial Migration of a BST Account	1			
LNP w/Directory Listing Orders	7			
Port a block of 20 DID numbers w/simple DL		1		
Port = 50 TNs w/simple DL</td <td></td> <td></td> <td></td> <td></td>				
Port > 50 TNs w/simple DL			 	
Full Migration of a BST Account w/simple DL	1			
Partial Migration of a BST Account w/simple DL		1		
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Port = 50 TNs w/complex DL</td <td></td> <td></td> <td></td> <td>1</td>				1
Port > 50 TNs w/complex DL			· · · · · · · · · · · · · · · · · · ·	1
Full Migration of a BST Account w/complex DL				1
Partial Migration of a BST Account w/complex DL				1
INP Orders				
Port a block of 20 DID numbers				
Port = 50 TNs</td <td></td> <td></td> <td></td> <td></td>				
Port > 50 TNs				
Full Migration of a BST Account				
Partial Migration of a BST Account	<u> </u>			
Loop Orders	<u> </u>			
<= 14 SL1 Loops	- 			
> 14 SL1 Loops				
<= 14 SL2 Loops	-			
>14 SL2 Loops				
<= 14 DS0 Loops	 			
>14 DS0 Loops				
<= 14 DS1 Loops				
>14 DS1 Loops				
<= 14 ISDN BRI Loops				
>14 ISDN BRI Loops	-			
THOUSE DIST. COOPS			T .	·

AT&T BELLSOUTH MECHANIZATION PROJECT

	Fully	CLEC	CLEC Manual;	CLEC Manual;
	Electronic	Electronic;	Could be Sent	Cannot be Sent
		BST Partially	Electronically	Electronically
	Į į	Mechanized		
Loop Orders with LNP				
<= 14 SL1 Loops w/LNP				·
> 14 SL1 Loops w/LNP	-			
<= 14 SL2 Loops w/LNP				
>14 SL2 Loops w/LNP				
<= 14 DS0 Loops w/LNP				
>14 DS0 Loops w/LNP				
<= 14 DS1 Loops w/LNP				
>14 DS1 Loops w/LNP				
<= 14 ISDN BRI Loops w/LNP				
>14 ISDN BRI Loops w/LNP				
	· · · · · · · · · · · · · · · · · · ·			
Loop Orders with LNP and Directory Listings			<u> </u>	
<= 14 SL1 Loops w/LNP and simple DL				
> 14 SL1 Loops w/LNP and simple DL				
<= 14 SL2 Loops w/LNP and simple DL				
>14 SL2 Loops w/LNP and simple DL				
<= 14 DS0 Loops w/LNP and simple DL				
>14 DS0 Loops w/LNP and simple DL				
<= 14 DS1 Loops w/LNP and simple DL				
>14 DS1 Loops w/LNP and simple DL				
<= 14 ISDN BRI Loops w/LNP and simple DL				
>14 ISDN BRI Loops w/LNP and simple DL				
<= 14 SL1 Loops w/LNP and complex DL				
> 14 SL1 Loops w/LNP and complex DL				
<= 14 SL2 Loops w/LNP and complex DL				
>14 SL2 Loops w/LNP and complex DL				
<= 14 DS0 Loops w/LNP and complex DL		·		
>14 DS0 Loops w/LNP and complex DL				
<= 14 DS1 Loops w/LNP and complex DL			·····	
>14 DS1 Loops w/LNP and complex DL				
<= 14 ISDN BRI Loops w/LNP and complex DL				
>14 ISDN BRI Loops w/LNP and complex DL				
Other				
RPON'd Orders		2.		
		2+		
LNP Port from <=4 non-complex BST accounts to one AT&T account		4		
LNP Port from >4 non-complex BST accounts to one		1		
AT&T account		2.		
		2+		
LNP Port from >1 complex BST account to one AT&T		3 .		
account		2+		ļ
INP Port from many BST accounts to one AT&T account		2+		

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BellSouth Flow-through Analysis for CLECs

Please define the following terms:

Complex Order: An order for a complex service.

Complex service: Any service which requires manual handling, such as negotiations with the customer, and manual service order generation.

Designed Service: Requires special engineering and provisioning, and may be served by more than one Central Office or Wire Center.

Non-Designed Service: Doesn't require special provisioning, and is served by one Central Office or Wire Center.

Hand-off package: The package of material and information which BellSouth account teams gather on a complex service which describes the customer's requirements and specifications of the service ordered.

Service Inquiry: The request from a customer (including CLECs) to inquire about ordering a complex service.

Project: An order for either a complex service or a large number of UNEs, for example, which requires coodination to ensure that related services are worked simultaneously or in the proper sequence to fulfill the order.

"Project Managed": The act of handling a project.

What specific activities does the LCSC perform for an error-free complex service ordered electronically which falls out for manual processing? Response: The LCSC manually generates the service order into DOE or SONGS.

Please provide a detailed flow-chart, including details of Account Team involvement in the process after the LSR has been electronically submitted. Please provide copies of any associated forms the LCSC must complete, and copies of LCSC instructions or methods and procedures. LCSC methods and procedures are intellectual property and cannot be viewed by CLECs.

In its January performance results, BellSouth reported that 5,720 (11% of total LENS LSRs) LSRs fell out of LENS for manual processing, and 3,022 (15% of total EDI LSRs) LSRs fell out of EDI for manual processing. Please provide a quantified breakdown of the reasons for fall out, i.e. the number of each type of service ordered which caused fallout, the number of various order or quantity types that caused fall-out, etc. Please provide this information by interface type. See the matrix, which also requests this information.

The following table addresses services and whether orders for those services will flow-through, and if not, why not. Are there other reasons other than types of services ordered that will cause

1

Louisiana Public Service Commission Docket U-22252 Sub-Docket C Exhibit B

an error-free order not to flow through, e.g. quantity, partial migrations, etc? If so, please provide all such reasons. See the matrix

Note. Please add any services provided as resale or UNEs to CLECs but omitted from the following matrix.

Response Please see attached flow-through explanation and flow chart

Docket No. 000731-TP JMB-R24 Page 2 of 8

BellSouth Flow-through Analysis For CLECS LSRs placed via EDI or TAG

	BellSouth Service	Flow-through	Complex	Complex	Design	Can ordering this service cause
ł	Offered to CLEC via	if no BST or	Service	Order	Service	fall out for a reason other than
l	resale or UNE	CLEC Errors	(Yes/No)	(Yes/No)	(Yes/No)	errors or complex? If so, what
L		(Yes/No)	, , , , ,			reason?
1	Flat Rate/Residence	Yes	No	No	по	
2	Flat Rate/Business	Yes	No	No	no	
3	Pay Phone Provider	No	No	No	no	
4	Measured Rate/Res.	Yes	No	No	DO	
5	Measured Rate/Bus.	Yes	No	No	DO	
6	Area Plus	Yes	No	No	RO	
7	Package/Complete Choice and area plus	Yes	No	No	no	
8	Optional Calling Plan	Yes	No	No	110	
9	Ga. Community Calling	Yes	No	No	100	
10	Call Waiting Deluxe	Yes	No	No	20.	
11	Call Waiting	Yes	No	No	RO	
12	Caller ID	Yos	No	No	DO.	
13	Speed Calling	Yes	No	No	0 0	
14	3 Way Calling	Yes	No	No	100	
15	Call Forwarding- Variable	Yes	No	No	no no	·
16	Remote Access to CF	Yes	No	No	BO .	
17	Enhanced Caller ID	Yes	No _	No	tio .	
18	Memory Call	Yes	No	No	no	
19	Memory Call Ans. Svc.	Yes	No	No	110	
20	MTS .	Yes	No	No	DO	
21	RCF	Yes	No	No	DO	
22	Ringmaster	Yes	No	No	nio	
23	Call Tracing	Yes	No	No	TAO .	
24	Call Block	Yes	No	No _	no	
25	Repeat Dialing	Yes	No	No	110	
26	Call Selector	Yes	No	No	no	
27	Call Return	Yes	No	No	DO	
28 ·	Preferred Call Forward	Yes	No	No	ВО	
29.	Touchtone	Yes	No	No	no	
30	Visual Director	Yes	No	No	DO .	
31	INP (all types?)	Yes	UNE	No	120	
32	Unbundled Loop-	Yes	UNE	No	Yes-	
	Analog 2W, SL1, SL2	}	. }	. 1	designed,	
	• .	j	}		B0-B0D-	
			<u></u>	}	designed	•
33	2 wire analog port	Yes	UNE	No	no	
34	Local Number	Yes	UNE	No	DO	
	Portability (always?)		<u> </u>			<u> </u>
35	Accupulse	No	Yes	Yes	yes	See note at bottom of matrix.
36	Basic Rate ISDN	Yes	Yes	Yes	y es	
37	DID	No*	Yes	Yes	Yes	* yes with OSS*99 - 9/99 .
38	Frame Relay	No	Yes .	Yes	yca ·	
19	Megalink	No	Yes	Yes	yes	
10	Megalink-T1	No	Yes	Yes	yes	

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_ <u>EX</u>	moit B		T	7	1	7
	BellSouth Service Offered to CLEC via resale or UNE	Flow-through if no BST or CLEC Errors (Yes/No)	Service (Yes/No)	Complex Order (Yes/No)	Design Service (Yes/No)	Can ordering this service cause fall out for a reason other than errors or complex? If so, what reason?
41	Native Mode LAN Interconnection (NMLI)	No	Yes	Yes	yes	
42	Pathlink Primary Rate ISDN	No	Yes	Yes	yes	
43	Synchronet	Yes	Yes	Yes	yex	
44	PBX Trunks	Yes	Yes	Yes	Yes	
45	LightGate	No	Yes	Yes	yes	
46	Smartpath	No	Yes	Yes	yes	
47	Hupting	Yes	Yes	20	EO	
48	CENTREX	No	Yes	Yes	DO	
49	FLEXSERV	No	Yas	Yes	yes	
50	Multisery	No	Yes	Yes	yes	
51	Off-Prem Stations	No	Yes	Yes	yes	
52	SmartRING	No	Yes	Yes	7/88	
53	FX	No	Yes	Yes	YES	
54	Tie Lines	No ·	Yes	Yes	Yes	
55 55	WATS	No	Yes	Yes	yes	
56	4 wire analog voice grade loop	No (sail ste	UNE	Yes	yes- designed, no-non- designed	
57	4 wire DS1 & PRI digital loop	No .	UNE	Yes	yes	
58	2 wire ISDN digital loop	No	UNE	Yes	yes	-
59	4 wire DSI & PRI digital loop	No	UNE	Yes	yes	
iO	ADSL	No*	UNE	Yes	yes	* yes as of OSS'99?
ī	HDSL	No	UNE	Yes	yes	
2	2 wire analog DID trunk port	No	UNE	Yes	Yes	
3	2 wire ISDN digital line side port	No	UNE	Yes	yes	
4	4 wire ISDN DSI digital trunk ports	No .	UNE	Yes	yes	
5	UNE Combinations	y-loop+port	UNE	Yes	yes	
6	Directory Listings (simple)	No*		Yes	110	* yes as of OSS'99
7	Directory Listings (complex)	No*	UNE	yes	100	• yes as of OSS'99, captions and indentions
8	ESSX	No	Yes	Yes	70	

Note for last column: For all services that indicate 'No' for flow-through, the following reasons, in addition to errors or complex services, also prompt manual handling: expedites from CLECs, special pricing plans, for denials – restore and conversion or disconnect and conversion both required, partial migrations (although conversions-as-is flow through), class of service invalid in certain states with some TOS – e.g. gov't, or cannot be changed when changing main TN on C activity, low volume – e.g. activity type Temove, pending order review required, more than 25 business lines, respore or suspend for UNE combos, transfer of calls option for CLEC end user – fixed with release 6.0, new TN not yet posted to BOCRIS. All but the last one are unique to the CLEC environment.

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BellSouth Retail Flow-Through

Please define the follow	ving terms:
(See previous page - all Complex Order:	the same definitions.)
Complex service:	•
Designed Service:	er esta es
Non-Designed Service:	
Hand-off package:	
Service Inquiry:	
Project:	
Project Managed":	ngar - Anghair aga and a sa a sa a sa a sa a sa a sa a sa

In its January performance results, BellSouth reported that 4.90% of its retail residence orders did not flow through, and that 21.24% of its retail business orders did not flow through. Please explain at what point in the process the orders failed to flow-through. Response: The business retail flow-through is actually zero. This is due to the fact that all service orders entered into DOE or SONGS have to be manually generated by the service representatives. BellSouth has been incorrectly reporting its business retail flow-through, and will begin reporting it correctly as zero as of the March flow-through report. For residence, SOCS errors, other order errors, or orders that require manual handling such as inaccurate CSRs or low volume services cause fallout from flow-through.

Please provide a quantified breakdown of the reasons for fall out, i.e. the number of each type of service ordered which caused fallout, the number of various order or quantity types that caused fall-out, etc. If BellSouth orders fall out for manual processing for different reasons than CLECs, please indicate. Please see the matrix.

What specific activities do the BellSouth retail order centers perform in order to successfully submit into SOCS an error-free BellSouth order that initially failed to flow-through? Please provide copies of any associated forms the retail centers must complete, and copies of instructions or methods and procedures. Retail business office methods and procedures are intellectual property and therefore cannot be viewed by CLECs.

The following table addresses services and whether orders for those services will flow-through, and if not, why not. Are there other reasons other than types of services ordered that will cause an error-free order not to flow through, e.g. quantity, partial migrations, etc.? If so, please provide all such reasons.

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Exhibit B

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	5	8	ğ	8	B	į	1	B	2	2	8	8	18	1		5	3	5.	. !	5	5	-	8	1	-	No	g			Year
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ď	Ya	Ycı	Yes	Yes	ā	1		ត	Yes	a	2	In	18			Ya	Ya		Ya	ă	ì				į	2			RNS/DOE/ SONGS? Y=/No	8
4	- 1	- 1					7	- 1	\neg		_	$\boldsymbol{\tau}$		_	_	-	-	_	_	-	-			_					-	•

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BellSouth Flow-through

Interconnection (HML)
Pathink Primary Rate (SDN
Synchrone)
PBX Trunks
LightGate
StraitPath
Hunting
CENTREX
FLEXSERV Basic Rate (SDN DID Frame Relay Hegaliah Hegaliah-TI Native Mode LAN Repeal Disking
Call Selector
Call Return
Preferred Call Forward
Touchtons Visual Director
Local Number Portability Offered to Retail Customers BellSouth Services इ इ इ इ इ इ इ।इ।इ।इ।इ E 0 0 0 0 0 0 0 0 7 Flowdrough
if no BST
Errors
(Yes/No) 2 2 2 2 2 2 ĭ इडिइइइइइ Service (Yea/No) 3 4 5 5 5 6 6 6 ř 3 3 3 3 3 3 (Yea/No) 图图 图图 图图 图 म व व व व व ă 8 5 5 5 8 8 Saving Yeshio * for RNS only ** so for large business " o usually yes; no if loop start tunks All bestucts orders are manually service Can erdering this service cause "fall aut" for a senson order dan errors or complex? If so, what reason? ANS/DOE/ SONGS? Yes/No 20000 2 Order input Nun. during DOE/SONGS Remail handling
occurs prior to
input into
RNS/DOE/SONGS
ar after input into
RNS/DOE/SONGS

Louisiam Public Service Commission Docket U-22257 Sub-Docket C Exhibit B

If order require

•	Note: for BST residence orders, other causes of fallow Land.		and of the	e personner	Perferten rus	Video conferencing	Crisistiak	Total mondoring	The state of the s	Managed Name	Adv. Telecoman, Svc.	Broadband ATM	
	her causes of fails		8	8	8	8 8	;		₹	2	₹ ₹	: ;	8
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recurreize and low waters	is a complex or designed service	"depending on if the service hartest	•						,	•	order generated.	All business orders are manually service	,
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ADSL	" Please add any services or		_	at Listings (complex)	Marie (State)				FX		Charleston	Charles							Composite to warming Company	Control and Control		
e e e e e e e e e e e e e e e e e e e			1	3	Ya	8	3	8			8						O'CANO)	Emary	Con BST	Howdwood		
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1	PLACE: Dobbs Building, Raleigh, North Carolina
2	DATE: August 2, 2000
3	TIME IN SESSION: 9:00 a.m 1:05 p.m.
4	BEFORE: Chair Jo Anne Sanford, Presiding Commissioner Ralph A. Hunt
5	Commissioner Judy Hunt Commissioner William R. Pittman
6	Commissioner J. Richard Conder Commissioner Robert V. Owens, Jr.
7	Commissioner Sam J. Ervin, IV
8	IN THE MATTER OF:
9	Docket Number P-140, Sub 73
	and Docket Number P-646, Sub 7.
10	AT&T Communications and TCG of the Carolina's
11	Arbitration with BellSouth Telecommunications.
12	VOLUME 4
13	APPEARANCES:
14	FOR AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.:
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24	

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1	APPEARANCES CONTINUED
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- 1 didn't make assumptions, you actually had the actual
- data, it's a different result. He doesn't have full
- 3 knowledge of this information.
- 4 Q. And the significance of that different result is
- 5 what?
- 6 A. Is I see no significance in Mr. Bradbury's
- 7 analysis.
- 8 Q. I guess I don't understand why you took the time
- 9 to debunk it then.
- 10 A. Because Mr. Bradbury took the time to put it in
- 11 his deposition or -- excuse me, not his deposition, his
- 12 testimony, and I had to respond to it.
- 13 Q. I'd like to direct your attention to, I guess, a
- 14 customer service assistant sitting in front of the ROS
- 15 interface.
- 16 A. Okay. Excuse me one second. I'm going to try to
- 17 get myself a little organized up here. Let me
- 18 straighten up the desk here.
- 19 Q. Sure, take all the time you need. I'll do the
- 20 same.
- 21 A. Thank you. I'm ready.
- 22 Q. Can you -- while the customer service assistant is
- 23 sitting in front of ROS, can you tell me any service
- 24 that that BellSouth representative can't type in

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information and get an order out the other end, any

- 2 service or element that they can't use ROS to enter
- 3 information for?
- 4 A. I am not aware of any service element that they
- 5 cannot type in in a sales service order SOCS acceptable
- 6 format.
- 7 Q. Okay. And they can do that even for complex
- 8 orders, correct?
- 9 A. Yes, just like DOE is utilized in the LCSC.
- 10 Q. That's assuming that all the appropriate manual
- 11 work has been done, right?
- 12 A. Yes.
- 13 Q. And perhaps beating a dead horse here, if I'm the
- 14 customer service rep, I'm sitting in front of ROS, I've
- 15 entered in the information and the order comes out in
- 16 SOCS, I have available to me other databases that have
- 17 been populated by the one act of entering information,
- 18 don't I?
- 19 A. Yes, you do, just like the CLECs do. They have
- 20 access to the same databases.
- 21 Q. But they don't have it in their own databases like
- 22 BellSouth does, do they?
- 23 A. No, they're responsible for their databases.
- 24 Q. So they would have to make an additional entry

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BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:

AT&T'S Petition for Arbitration of : Rates, Terms and Conditions with : Docket No. 11853-U

BellSouth Telecommunications

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

> Docket No. 000731-TP JMB-R26

> > Brandenburg & Hasty 231 Fairview Road Ellenwood, Georgia 30294

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APPEARANCES:

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On behalf of Consumers' Utility Counsel:

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On behalf of the Commission Adversary Staff:

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

	INDE	<u>X</u>		
WITNESSES:	DIRECT	CROSS	REDIRECT	RECROSS
David L. Talbott By Mr. Lamoureaux By Mr. Lackey	612 	 676	721	
 Alphonso J. Varner By Mr. Ross	727			
Keith Milner By Mr. Lackey By Mr. Lamoureux	809 	 899	947	
Ronald M. Pate By Mr. Lackey By Ms. Rule	951 	 1089		
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14 through 21 - Milner Ext	nibits		809	950
22 - Milner Exhibit			887	950
23 through 39 - Pate Exhib	oits	1	083	1111

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1	PROCEEDINGS
2	CHAIRMAN DURDEN: This hearing of the Georgia
3	Public Service Commission in Docket Number 11853-U will now
4	come to order.
5	Cross examination of Mr. Talbott is proceeding.
6	VICE CHAIRMAN BURGESS: No, he's got to presented.
7	COMMISSIONER BAKER: He has to be sworn.
8	CHAIRMAN DURDEN: Oh, he's just now coming up?
9	MR. ROSS: Yes, sir.
10	CHAIRMAN DURDEN: Well, go ahead and call him
11	then.
12	MR. ROSS: Just one housekeeping matter, Mr.
13	Chairman. I believe BellSouth forgot to introduce into
14	evidence BellSouth Exhibits 4 and 5 and we'd ask that that
15	be done at this time.
16	CHAIRMAN DURDEN: Any objection?
17	(No response.)
18	CHAIRMAN DURDEN: Admitted without objection.
19	(The documents, heretofore marked
20	as BellSouth Exhibits 4 and 5, were
21	received in evidence.)
22	MR. LAMOUREUX: AT&T calls as its next witness
23	Dave Talbott.
24	Whereupon,
25	DAVID TALBOTT

Docket No. 000731-TP JMB-R26 Page 4 of 30 gateway interface. What AT&T really wants is entirely new non-industry standard machine-to-machine maintenance and repair interface. This simply isn't required. Through TAFI, BellSouth provides AT&T access to the same system used by BellSouth's own retail units. AT&T's representatives who use TAFI see the same screens, can perform the same functions and have absolutely nondiscriminatory access to BellSouth's maintenance and repair system.

What AT&T complains about is that it can't be integrated into AT&T's back office systems. That may well be true, but as the FCC has said in Texas and New York, that is not necessary as long as AT&T has the same access to BellSouth's maintenance and repair system as does BellSouth retail units. And it does.

If AT&T actually wants a machine-to-machine interface for maintenance and repair, it can ask for one, as long as it is willing to pay for the development of such a system, it can have one. Instead, AT&T is simply asking this Commission to provide AT&T with more than it is entitled to, and to provide the service at no cost to AT&T. If it can get away with that kind of approach, I suppose it makes good business sense. But in this case, parity doesn't require such a systems. If AT&T wants it, it should pay for it.

Thank you, this concludes my summary.

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CROSS EXAMINATION

2 BY MS. RULE:

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- 3 Q Good afternoon, Mr. Pate.
- A Good afternoon.
- Q I'm Marsha Rule and we've met before, haven't we, 6 Mr. Pate?
- 7 A Yes.
 - Q I recognize that the hour is late, so I will endeavor not to keep y'all very long. I've got a couple of questions for you about change control, Mr. Pate --
 - A Certainly.
 - Q -- Issue 41. This Commission has actually been a leader in the region on the issue of change control, hasn't it?
 - A Yes, they have.
 - Q And, in fact, the original change management process was established by BellSouth in connection with this Commission's guidance, wasn't it?
 - A The Commission was very active back several years -- well not years, but months -- roll over years -- yes.
 - Q So you would agree, wouldn't you, that the Commission certainly has the expertise and the historic knowledge to review the current change control process to determine if it should be modified as AT&T requests?
- 25 A Well now, I don't know that I agree with that.

I'm not saying -- not the expertise in the Commission, by any means. While they've given some guidance from their understanding of what the need is, I think the expertise lies with BellSouth and the CLECs.

- Q Have you reviewed Mr. Bradbury's rebuttal Exhibit
 Number 3 that shows all the changes to the change control
 process that AT&T is requesting?
 - A Yes, I have.

- Q And do you understand that AT&T isn't asking
 BellSouth to adopt this exhibit, or asking the Commission to
 adopt the exhibit and write it in stone, but to adopt it as
 part of the ongoing change control process?
- A I'm not quite sure that I understood it that way.

 The way I heard Mr. Bradbury state it was he wanted the

 Commission to order us to do these. To me, that's pretty

 much adopted in stone. I haven't heard, or did not pick out

 in his testimony where he was referring that this would just

 be a starting point.
- Q Now you've described the change control process as collaborative, haven't you?
 - A Yes, I have.
- Q And changes to BellSouth's business rules are supposed to go through the collaborative change control process, aren't they?
- 25 A That's as currently defined, yes.

Q	Okay	. Now I	Bells	outh red	cent	:ly :	relea	sed	some	
business	rule	changes	that	didn't	go	thr	ough	the	process,	is
that corr	rect?									

A Which ones are you referring to?

- Q Issue 9-G of BellSouth's business rule changes.
- A I think there were some that did not get the proper coverage, I would agree.
- Q And some of those business rule changes required CLECs to do some coding on the CLEC side of the interface in order to continue passing orders, is that correct?
- A I have not personally reviewed it but, subject to check, I'll accept that.
- Q And are you aware that the CLECs have explained to BellSouth that they didn't have enough notice or time to do the coding that would be required?
- A That's what I've heard, yes, that specific one that you're referring to.
- Q And BellSouth released Issue 9-G of the changes in any event, didn't it?
- A That's what happens -- to my understanding, that's correct. However, let me just clarify that this has been an evolving process, evolving from not just a standpoint of the documentation, but also evolving from BellSouth in developing its internal processes to support the process. So while what you say has happened in that case, there may

be other instances where we didn't follow it as well as it is currently documented today. It hasn't always been clearly documented that way. And our internal processes have been refined, and we are committed to the -- to the process.

- Q What's the current version number of the change control process?
 - A 2.0.

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- Q When was that adopted as 2.0?
- A August -- I think it -- I've forgot the exact date. August 23rd or something along that time frame.
- Q And when was Issue 9-G of the business rule changes released?
- 14 A I'm not sure.
 - Q It was well after August, wasn't it?
- 16 A I'm not sure.
 - Q Now, if I understand your testimony, one of the reasons that you object to this Commission making a determination about AT&T's request for changes to the change control process is that only AT&T and BellSouth are involved in the docket, correct?
- A Only in this docket as an arbitration, that's correct.
 - Q Okay. So you believe it would be more appropriate for this Commission to make these issues part of its ongoing

OSS docket?

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A No, I really don't. What I thank would be more appropriate is for the Commission to send the guidance back to the body itself, a forum -- industry forum to work through these issues. And if they cannot actually resolve -- once you fine tune to those few issues that we just can't see eye to eye, there's a process built in there for internal escalation within BellSouth, and if that's not sufficient, then to take it in the form of an issue to the appropriate commission.

VICE CHAIRMAN BURGESS: Let me ask a question. One of the concerns -- I just have a general concern about making changes to the process documented in the arbitration I read this document during the day, and one of the cases. things that I noticed in the section regarding changes of processes, it doesn't include anything about arbitration being a vehicle to make changes or not make changes. guess in my mind, one of the concerns I would have is, if another party filed arbitration -- say the Commission adopted this agreement, there's nothing in this agreement that I see that would prohibit another party from seeking to arbitrate the same issue, saying we've got some problems with the process, the change management process, and coming back here and making those changes in the context of an arbitration case. I guess one of the questions is, if the

Commission were to adopt these changes, should there be some verbiage in this document that would provide one method to change of process is arbitration? I ask you that question, Mr. Pate, just hypothetically, if the Commission were to adopt this document, would it be necessary to include as a vehicle for prospective change future arbitrations?

THE WITNESS: Well that's absolutely the question, To me, from my personal view, arbitration is Commissioner. still not the appropriate forum, because arbitration really exists between BellSouth and one particular individual CLEC. And as much as CLECs work jointly in some areas, I don't think any of them are going to give proxy to another CLEC in arbitration to state their issues around something that impacts them all. However, nothing prevents them from joining in terms of trying to ask the Commission to give a general docket or a complaint, things of that nature, if they agree to whatever they're filing. And to me, that's what we're trying to say in the process, that you can take it to the Commission through a formal proceeding, not an arbitration proceeding. It could be a complaint filed or whatever if they have an issue in dispute we cannot resolve among ourselves.

23 BY MS. RULE:

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Q Mr. Pate, do you agree that this Commission does have authority to order changes in the change control

Docket No. 000731-TP JMB-R26 Page 11 of 30 process?

- A This Commission has the authority to order anything that it thinks is appropriate. That's for this Commission to decide.
- Q Turning to Issue 42. Do you understand that AT&T is asking in this case for the ability to submit electronic orders for all services and elements?
 - A Yes.
- Q And you would agree, wouldn't you, that electronic ordering is cheaper and faster, generally speaking, than manual ordering?
- A Generally speaking. There's only a couple exceptions. One would be where you just don't have the volume for that particular transaction. If you did one or two of something a year, it's not going to be cheaper to go through the process of the dollars associated with developing that code and maintaining that code. In that case, because there's so few, you probably really are cheaper to have someone manually do it.
- Q Okay. So generally you agree with me with that exception?
 - A Yes.
- Q And generally speaking again, electronic ordering and processing is less prone to error, isn't it?
- A Yes and no. I mean, you're still prone to the

Docket No. 000731-TP JMB-R26 Page 12 of 30 errors of entry, but then all the mechanization takes place after that and obviously it's less prone.

- Q BellSouth has already gone ahead and automated some ordering and processing for CLECs, hasn't it?
 - A Yes, most definitely.

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- Q For example, CLECs can order residential POTS resale electronically and it will be processed electronically, correct?
- A Yes. I mean, to state it clearly, 82 percent, based on last month's order volume, was submitted electronically -- BellSouth. Eighty-two percent of all the electronic -- excuse me, all the LSR submissions.
 - Q And most of those were for resale, weren't they?
- A Certainly. I mean, that's your highest volume, in resale, certainly.
 - Q Now, if I understand your testimony correctly -in your written testimony, you say that electronic
 processing of most other services -- for which electronic
 ordering and processing isn't available for CLECs right now.
 You're saying it's also not available to BellSouth, is that
 correct?
 - A I'm not quite following you. I apologize. Do you have a particular place to refer me or just restate the question for me.
- 25 Q Sure. Let's take a look at page 110 of your

- testimony, beginning on line 3.
 - 110, line 3?
- There's a sentence that begins on line 3. 0 starts out because.
 - Yes, I've read that. Α
- 0 Could you read that, please?
 - Α Do you want me to read the sentence? I'm sorry.
- Q Yes.

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- Okay. The sentence that starts on line 3 of 110 of my testimony reads, "Because the same manual processes are in place for both CLEC and BellSouth retail orders, the processes are competitively neutral, which is exactly what both the Act and FCC require".
- Okay. Now you also explain in your testimony that MultiServe is an example of a service that you say BellSouth has not automated for itself, correct?
- 17 Α Yes.
 - Q And while you've got your testimony, could you turn to your Exhibits 15 and 16, please.
- Commissioners, I have copies of those exhibits for 21 you, so you don't have to flip through your documents.
- 22 CHAIRMAN DURDEN: Okay, fine.
- 23 BY MS. RULE:
- Q Now Exhibit 15, which is not -- unfortunately is 25 not indicated on this document, is labeled CLP, Complex

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- Services, Multiserve, correct?
- 2 A Yes.

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- Q And that means CLP, and that's a North Carolina designation for competitive local provider, correct?
- A That's correct.
 - Q And the next document, which is your exhibit 16, is labeled BST Retail: Complex Services, MultiServe, correct?
- 9 A That's correct.
 - Q And in these two documents, you say that you compare the multiserve ordering process for BellSouth retail and for the CLECs, correct?
 - A Yes.
 - Q And we talked about these same documents in North Carolina, didn't we?
- 16 A Yes, we did.
 - Q Let's take a look at the diagram for BellSouth retail first. There's a notation at the bottom of the page that says shade indicates manual processing.
 - A Yes.
 - Q So all these boxes that are shaded means that there are manual steps involved and they are not electronic for BellSouth, correct?
- 24 A That's correct.
- 25 | Q Over on the right-hand side of the page there are

two boxes that are unshaded. Could you tell me what the top of that two boxes represent?

- A Are you referring to the box that reads CSA-order entry into ROS?
 - O Yes, sir.

- A ROS is the regional ordering system. That's the BellSouth system where we submit our service orders for our business transactions. The CSA is the customer service assistant that actually enters the order. Then you can see the line is indicating it's going to the service order communication systems, SOCS. That's where that order, once entered in the SOCS-compatible format, is transmitted there for further provisioning by the down-stream systems.
- Q And those aren't shaded, so that means that's an electronic process on this schedule, correct?
- A That means it's an electronic transmission of a SOCS-compatible formatted service order to SOCS.
- Q Okay. Could you turn to Exhibit 15, the CLEC complex service order.
 - A I'm there.
- Q Okay. And the two unshaded boxes are more in the middle of the page here. What do those indicate?
 - A The one in the middle, the first one, reads CSA order entry into DOE. So there's still a customer service assistant entering into the direct order entry, which is the

system we used in the local carrier service center for entering the orders that are submitted to us that we get manually. You can see the line indicating to the same system, which is the common point, the service order communications system, SOCS, for once again, further downstream provisioning processing.

- Q Okay. But in each case, it's a BellSouth customer service representative who is doing the ordering into the system, is that correct?
 - A That is correct. It's designed that way.
- Q Okay. Now when the customer service representative enters the order into ROS on the BellSouth chart, it has an electronic record of the order, correct?
- A I'm not quite clear what you mean by electronic record.
- Q Well, I guess one way to put it would be that -or to ask you whether the order entry into ROS by the
 BellSouth customer service representative creates any
 information in any other BellSouth back-end system.
- A What it creates is a service order that's transmitted to the SOCS for further provisioning.
- Q Well, let's say -- does it also update the customer service information records?
- A That order itself that's created in ROS does not.

 That's part of the provisioning process.

Docket No. 000731-TP JMB-R26 Page 17 of 30 Q Does the customer service representative have to enter it separately into the customer service information records, or is that record created as part of the same order/entry process?

A The information that you're updating into the customer service record is a result of the provisioning process. It is a result of when that order is submitted and when it's provisioned by the various further downstream systems when the order is actually completed. That gets it updated into the customer records information.

Q Well if you'll give me a moment, Mr. Pate, I'm going to look in to North Carolina transcript, because I believe you agreed with me that there was an order/entry -- one-time order/entry that updated some other data bases.

So, I guess the question I would ask you is, have you changed your answer?

A No, I haven't changed any answer from North Carolina, so I'm obviously not hearing the question the same.

Q I'll let Mr. Bradbury look that up.

Okay, let's look at the CLP, complex services chart, again. Again, this is a BellSouth customer service representative entering information into DOE, correct?

A That's correct.

Q Does that electronic entry create any billing

record entries for the CLEC?

- A It only creates the billing record when we bill the CLEC. The CLECs, if you're referring to how they bill they bill their customers, no that would be a part of their systems.
- Q And the CLEC's customer service information records aren't updated either by the act of that orderentry, are they?
- A Definitely not. That's not how it's designed nor a requirement that I'm aware of.
- Q Okay. On the other hand, BellSouth gets to order -- or enter the order information once into the ROS system and that information is then accessible in other parts of BellSouth's back-end systems, isn't it?
- A That information is actually placed in whatever appropriate systems is a result of that provisioning of BellSouth, if that's what you mean by it's available, yes.
- Q Okay. As a result of that one order entry process?
- A As a result of a representative from BellSouth entering a service order, like it's always been, then the system is going to process that and update whatever appropriate systems are for us to serve that customer. That's our system's design, what we refer to as the Legacy systems.

Q So as a result of BellSouth's system design and the way BellSouth has chosen to set up the systems for CLECs, if the CLEC wants to have the same information in its back-end systems, it'll have to go through a separate orderentry or information-entry process, won't it?

A Only for that that's manually submitted is it going to have to do so. You know, a big issue with the FCC is being able to give you orders that are integratable, and that you can get some information back and integrate your system. But you're responsible for that part of your system that's going to do that integration.

Q Well, I would rather not get into the FCC orders.

Do you understand that what AT&T is asking for is basically to be able to have its customer service representative type the information into a system that will allow electronic ordering, just as BellSouth has, and allow its internal or back-end systems to be populated just as BellSouth does?

A No, actually I don't understand it that way.

Based on what your request was, was the ability to submit all of your orders electronically. I've never read anything into this at all about you being able to get any information back to update your systems. It's being able to get it -- input it and get it to flow through is the two issues -- sub-issues that you've discussed there. So I have not interpreted it that way.

COMMISSIONER BAKER: Mr. Pate, what are the drawbacks, technically or financially, to complying with the request AT&T has made? I mean, as for cost, just give me your best educated guess.

THE WITNESS: Certainly. Well they have two issues. Now the first issue is to be able to submit everything electronically, and their concern, as I understand it is, that we actually had the opportunity to do such since our systems are designed that way under SOC-compatible format. For a CLEC to do that, though, we're dealing with a local service request format, an industry standard national format. That we have to take that and actually convert it. You have to develop coding to convert that LSR format to a SOCs format so our systems can process it. That is rather challenging for the very complex orders to do so. We haven't been able to develop that code, how to do that, make that translation in all of these cases. That's the issue from just the ability to submit it electronically.

One way they could do it, if they had our exact same system, which there are many reasons probably why they would not want to. One, it's not an industry standard. It would only work for BellSouth's region. I haven't found anybody frankly that's made the offer that's willing to go through that investment as a CLEC, to train their personnel

Docket No. 000731-TP JMB-R26 Page 21 of 30 to use a system just for that purpose. Plus, some of these systems won't do -- like a -- may not do all the transactions that they would have a need for in terms -- they would have to have -- my sinuses are kicking in here -- to try to explain this. They may have to have more than one system to be able to do residential versus business the way it's designed. For example, if they used our R&S system, that's only designed to do residential.

And to get to the other issue is the flowing through of everything. I've really kind of touched on it already in that translations piece. That's the main component associated with that and we haven't been able to develop that coding. We have -- I'm not saying that you can't do it for everything, but the ones where we're down to now are extremely complex orders. We haven't figured out how to do it and some of those are of a volume nature that I discussed earlier. You may not want to do it. You don't enough of them.

COMMISSIONER BAKER: But just to give me an idea, it sounds like this is an expensive, complicated process, is that right?

THE WITNESS: Oh, most definitely. I mean, it's going to be very expensive just to figure out the coding, much less put it all in place and then maintain it on and on-going basis as things may change here. I mean, these are

things that you're talking about developing without any type of industry standards to assist in that process. Those may still evolve. Not that we wait on industry standards, sometimes we try to be the leader of those. This is not an easy effort. I know this Commission has looked at through the performance docket, to try to put a team out there to assess, to improve these things. And if that's what this Commission orders in that, you know, we're going to be obviously leading that effort trying to do that. But we're already trying to do that now and it's a challenge.

COMMISSIONER BAKER: Well would -- just hypothetically, what if a CLEC, or a group of CLECs said we will make the financial commitment to go hire, I don't know, a computer consultant, a software consultant to make this work? I mean, if Bell -- if they were willing to do that, spend their own money to develop the system, BellSouth checked it out, it works, it's not going to crash your system, something like that might be acceptable?

THE WITNESS: I would be definitely willing to entertain that. No one has come forth, obviously, with that type of offer, but we definitely would be receptive to sitting down and viewing what they would like to do in that respect.

COMMISSIONER BAKER: Well what about if you just said well, we estimate the cost will be X and we'll divide

JMB-R26 Page 23 of 30 it out among all the CLECs and this is your proportionate share, would you do it?

THE WITNESS: Well, I think actually that kind of happens in OSS recovery, but I'm not the cost expert when you think of it from that standpoint.

BY MS. RULE:

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- Q A follow-up question, Mr. Pate. For every business service that BellSouth offers its retail customers, a customer service representative will sit down and enter an order into ROS, correct?
 - A Yes, that's correct.
- Q And then that order is electronically sent to SOCS where a service order is produced, correct?
- A Well, yes, but let me make sure I clarify that point. I mean, these things don't happen by osmosis. You've got to enter this stuff somewhere. My technical term stuff, this service order -- the systems that we've designed is to enter it in that SOCS-compatible format. The issue we're talking about here is taking an LSR format and making that translations, which could end up in several SOCS orders. That's complex. That's not easy to do. It's that translation, the coding and the impact of that that's at issue.
 - Q And that's exactly what AT&T wants, isn't it?
- A Yes. I can understand why you would want it. I'm

just telling you that that's not something simple to do. We haven't been able to figure out how to do it, even though if you look at our results from the amount of orders that was submitted a year ago, this same time frame electronically was 49 percent. As I've already said, today it is 82 percent. I think we've made some pretty durned good progress in a year's time.

- Q And that 80-some percent referred to resale orders, did it not?
 - A No, no, it refers to all orders --
- 11 0 The bulk of which --
 - A -- of which the bulk are resale. If you take a look at the numbers and look particularly at the unbundled network elements, it has grown significantly this year as a result of our efforts.
 - Q Okay. Turning your attention to maintenance and repair. TAFI can't he used for maintenance and repair of all types of services, can it?
- 19 A No, it's for basically POTS services.
 - Q Okay. So that leaves out unbundled loops and switching and transport among other things?
- 22 A Yes.

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Q Okay. And EFTA doesn't allow CLEC customers to -or customer service representatives to correct all the
service problems that they could correct if they were using

1	TAFI, does it?
2	A I don't quite follow your question. Try me again.
3	I apologize.
4	MS. RULE: Well there might be an easier way to do
5	this. In order to avoid asking you any questions about the
6	FCC's order, what I would like to do, Commissioners, is mark
7	as an exhibit an excerpt of the FCC's Louisiana 2 order, ask
8	you to take official notice of the order and just let the
9	order speak for itself and then I'm done.
10	CHAIRMAN DURDEN: That is a marvelous idea.
11	(Laughter.)
12	CHAIRMAN DURDEN: We will take administrative
13	notice of it and allow you to introduce it.
14	MS. RULE: And I believe that would be Exhibit
15	Number 66.
16	CHAIRMAN DURDEN: Is there any objection to that?
17	I can't imagine that there would be.
18	MR. LACKEY: No, sir.
19	CHAIRMAN DURDEN: And I'm correct. So it's
20	admitted without objection.
21	(The document referred to was
22	marked for identification aas AT&T
23	Exhibit Number 66 and received in
24	evidence.)
25	MS. RULE: I'm content to let the FCC's order on

Docket No. 000731-TP JMB-R26 Page 26 of 30 1 TAFI and EFTA speak for itself and I have no more questions.

2 CHAIRMAN DURDEN: Okay. And, of course, I'll

3 remind you that if you want to make any commentary about it

4 or any argument based on it, just put it in the brief.

BY MS. RULE:

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Q Mr. Lackey has a request which I'm happy to fulfil, and that is about your North Carolina testimony.

Unfortunately, I have only one copy of it.

MR. LACKEY: Show it to him.

10 BY MS. RULE:

Q On page 205 of the North Carolina transcript, let me direct your attention to -- beginning on page -- or line 18 through the next page.

(The witness reviews the document.)

A Okay, I've read it.

Q And do you recall now agreeing with me that once the CSA enters the order into ROS, BellSouth has an electronic record of the order?

A Yeah, it seems to be the same way you asked the question. My brain is not working as good I can tell you. But from the standpoint that it's electronically created and transmitted from a transmission to SOCS, and then SOCS does further provisioning, I think that's the framework that we're talking about in North Carolina, and I still agree with that.

1	Q And you answered yes, correct?
2	A Yes.
3	Q And you agreed that the electronic record could
4	then populate various databases such as billing records?
5	A As part of the overall provisioning process, all
6	of that gets populated. It's electronically done. It's a
7	mechanized process unless something falls out as part of the
8	provisioning process, then someone may have manual
9	intervention. They correct, do whatever it is. Then much
10	of it is done electronically going forward.
11	Q And you agree that it can populate customer
12	service information records and maintenance and repair
13	databases?
14	A Oh, yes, certainly. Yeah, that's part of the
15	process.
16	MS. RULE: Thank you.
17	MR. LACKEY: No redirect. I would like to move
18	Exhibits 23 through 39.
19	CHAIRMAN DURDEN: Any objection?
20	(No response.)
21	CHAIRMAN DURDEN: They're admitted without
22	objection.
23	(The documents heretofore marked as
24	BellSouth Exhibits 23 through 39,
25	were received in evidence.)

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1	MS. RULE: And AT&T would move 66.
2	CHAIRMAN DURDEN: The witness is excused.
3	(Witness excused.)
4	CHAIRMAN DURDEN: Any objection?
5	(No response.)
6	CHAIRMAN DURDEN: It's admitted without objection.
7	(The document heretofore marked as
8	AT&T Exhibit Number 66 was received
9	in evidence.)
10	Do we have any other housekeeping matters?
11	(No response.)
12	CHAIRMAN DURDEN: I believe the procedural and
13	scheduling order sets forth does it not set forth a
14	briefing schedule?
15	MS. OCKLEBERRY: The problem, Mr. Chairman, would
16	be, we moved direct testimony out several times, so I don't
17	think it actually comports with the time period because
18	we've moved the hearing. That was changed also.
19	CHAIRMAN DURDEN: Okay. Well we need to set a
20	will five days be long enough?
21	MS. OCKLEBERRY: No, Commissioner.
22	MR. LACKEY: Mr. Ross is writing the brief. If
23	you would like it tomorrow it's okay with me.
24	(Laughter.)
25	CHAIRMAN DURDEN: Well, how long will it take you

Docket No. 000731-TP JMB-R26 Page 29 of 30 1 | to get a brief done?

MS. OCKLEBERRY: We don't even have the transcript

3 | yet.

4 CHAIRMAN DURDEN: Well they'll get you the

5 | transcript PDQ.

6 MS. OCKLEBERRY: If we could have 10 days?

7 CHAIRMAN DURDEN: I'll give you 10 days, 10

8 | calendar days from today.

MS. OCKLEBERRY: Can we negotiate 10 business

10 | days?

9

11 CHAIRMAN DURDEN: Let the record reflect that Mr.

12 | Lackey is showing facial expressions indicating great

13 | consternation. I thought you said your brief was ready to

14 | be filed?

MR. LACKEY: No, I said Mr. Ross had to write it

16 | and it could be tomorrow.

17 CHAIRMAN DURDEN: Okay. He doesn't need a

18 | transcript to do his. I'm sorry, I'm --

19 MR. LACKEY: We're tired.

20 CHAIRMAN DURDEN: Yeah, we're all tired. Let the

21 | record reflect that I'm -- these pitiful attempts at levity

22 | are mine.

How long, two weeks? Do we have a deadline that

24 | we're going to run up against? I don't want to run up

25 | against a deadline.

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				P	age 1
1	STATE OF NORTH CAROLINA				
2	UTILITIES COMMISSION				
	RALEIGH				
3					
	BEFORE THE NORTH CAROLINA UTILITIES COMMISSION				
4					
5	IN THE MATTER OF THE				
	INTERCONNECTION AGREEMENT				
6	NEGOTIATIONS BETWEEN AT&T				
	COMMUNICATIONS OF THE	Docket No.	P-140,	Sub	73
7	SOUTHERN STATES, INC., TCG	Docket No.	P-646,	Sub	7
	OF THE CAROLINAS, INC., and				
8	BELLSOUTH TELECOMMUNICATIONS,				
	INC., Pursuant to 47 U.S.C.				
9	Section 252				
	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~				
10					
11	DEPOSITION OF				
12	DOUGLAS W. McDOUGAL				
13					
•	July 28, 2000				
14					
	11:00 a.m.				
15					
16	1200 Peachtree Street, N.E.				
	Atlanta, Georgia				2
17					
	Wanda L. Robinson, CRR, CCR No. B-1973				1
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24			No. 0007		•
25			MB-R27		
		r	age 1 of 3	'	

•	Page 14		Page 16
1	1 would be something that's actually	2	If you can answer, you can. If you can't, don't.
2 3 4	impacting operational performance, causing us to not be able to process an order as	3	Q. (By Ms. Rule) Do you know who
) 1	quickly as we should, as accurately as we	4	the head of the IT organization is?
5	should.	5	A. From the perspective of local
6	Anything that impedes them doing	6	systems or the head of BellSouth Corporate
7	their job is essentially a Severity 1.	7	IT?
8	Q. Do you know if there is a time	8	Q. Local systems.
9	frame, a target time frame for solving	ğ	A. You're looking for an officer
10	Severity 1 problems?	10	level name or non-officer level name?
11	A. Generally I think the target time	11	Q. Not necessarily officer level.
12	frame is 24 hours.	12	Somebody who could define for me what the
13	Q. At the end of that 24 hours, if	13	various severity levels are.
14	it all works as planned, what should happen?	14	THE WITNESS: Can we give a name?
15	<ul> <li>A. The software would be updated in</li> </ul>	15	MR. EDENFIELD: If you know
16	the next maintenance period, which hopefully	16	someone who can give the severity levels.
17	would be after midnight the next day. They	17	A. My key interface into the IT
18	wouldn't upgrade software during production	18	organization is Susan Baughman,
19	environment.	19	B-A-U-G-H-M-A-N.
20	Q. Would you repeat the last part?	20	Q. I imagine from your job
21	A. They would not upgrade software	21	description, you're very familiar with the
22	during the day, during production. They	22 23	operation of the LCSC?
23 24	would upgrade software at night, put it through a test process on test platforms and	23 24	A. Fairly familiar.
24 25	ensure they didn't create another anomaly	25	Q. You've described some processes where an LCSC service rep will lease an
23	ensure mey didn't create another anomary	23	where an Ecoc service tep will lease an
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	within the software before putting it on the production boxes.  Q. You mentioned the next maintenance period. How often do maintenance periods occur?  A. Every night. Q. What happens during maintenance? A. Tables are updated, bug fixes are tested and implemented. Q. That's Severity 1. What are the other severity levels? A. I can't give you the definitions, but there obviously are less severe situations than SEV 2, SEV 3. I can't define them for you. Q. Do you know who could? A. Sure. Our IT organization can define those. Q. Possible name? Do you have a name for me? A. I can't tell you the best name on the systems, I'll be honest. I've only been	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	order to a downstream system. One of the things we're very interested in, obviously, is flowthrough. Do you have a flowthrough definition that's used to describe service orders that come into the LCSC and go out of them, what constitutes flowthrough for you?  A. A couple of different definitions of flowthrough. I'm not sure there's a definition. But generally flowthrough describes an order that flows through our systems through the Service Order Control System, or SOCS, without being touched by a service rep. In other words, it came in electronically generally and flows through those systems.  However, we also have flowthrough on orders that come in by fax and paper because we get tremendous numbers of fax and paper orders, particularly from smaller CLECs. So we attribute flowthrough to once the service rep builds the order and releases the order to the downstream systems, it flows
23 24	on the job for a week. I can give you some names but I'm not sure I would	23 24	without erroring out. So there are different definitions.
25	MR. EDENFIELD: Let's not guess.	25	Q. So basically, though, it sounds

Ì	Page 18		Page 20
1	like the difference in the definition is	1	assist us. So one of those three systems
2	where you start it off?	2	would be built. Those are service order
3	A. That's right.	3	generators. That's the purpose of those
4	Q. So if we're starting off an	4	systems.
5	electronic order, the point at which you	5	Q. So when would you say the order
6	begin to judge whether it flows through is	6	has been built?
7	before it even comes to the LCSC, correct?	7	A. At completion of that activity.
8	MS. RULE: Strike that.	8	Q. What happens after the order has
9	Q. The point at which you begin to	9	been built on the service order generator?
10	determine flowthrough is when it leaves the	10	A. It's handed off to the Service
11	CLEC hands, correct?	11	Order Control System, SOCS. More edits are
12	A. No. I wouldn't agree with that.	12	applied to it, and SOCS is a conduit to
13	Q. If You could correct me.	13	multiple other downstream systems, particularly
14	A. I would say that when it hits our	14	network provisioning systems, in order to get
15	mainframe. If it doesn't fatally reject,	15	the order actually provisioned in the
16	because fields are missing, then it could	16	network, and it's a front end to our billing
17	flowthrough. But the order can come in from	17	systems. Front end to provisioning systems,
18	your EDI system into our EDI receiver, and	18	various provisioning systems, and front end
19	it could be rejected due to fields being	19	to billing systems. Those are the next
20	missing. Obviously it wouldn't flow through.	20	steps.
21	We would never see that. That would be a	21	Q. So if I understand you correctly,
22	system-to-system interface. We wouldn't	22	paper comes in, LCSC service rep builds order
23	attribute it leaving your system; we would	23	on the service order generator, whichever one
24	attribute it beginning at the receiver of our	24	is applicable to that particular order,
25	systems.	25	releases the order to SOCS, more edits are
	•	!	
	Page 19		Page 21
. 1	Page 19 Q. You mentioned that for	1	_
1 2	Q. You mentioned that for flowthrough, for orders received via fax or	1 2	Page 21 applied. If it passes those edits, it's then released to downstream provisioning
1 2 3	Q. You mentioned that for	1 2 3	applied. If it passes those edits, it's
2 3 4	Q. You mentioned that for flowthrough, for orders received via fax or	3 4	applied. If it passes those edits, it's then released to downstream provisioning systems?  A. Correct.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. You mentioned that for flowthrough, for orders received via fax or on paper, that the service rep builds the order and releases it to downstream systems, correct?  A. That's right. Q. Can you define for me what you mean by the service rep building an order? A. A local service request comes in, an LSR, local service request. That order can be faxed in or be delivered by overnight mail. The service rep's responsibility is to turn that into a true service order that meets the BellSouth definitions of service order. Field sizes, number of fields, what has to be populated, what's option, et cetera. They would use a service order generated program to build that order.  If it's an LNP order, they would use the LNP gateway. If it's not an LNP orders, they would use one of two systems: DOE, Direct Order Entry System, or SONGS. I don't know what that stands for. Service	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	applied. If it passes those edits, it's then released to downstream provisioning systems?  A. Correct. Q. When does the order become assignable? When does it achieve assignable status?  A. I'm not sure what you mean by assignable. Q. Are you familiar with BellSouth's processes for building orders for its own customers, it's own retail customers?  A. No.  From SOCS down, it's the same process, but I'm not really familiar to talk to you about routine process, if those are the same systems.  Q. When the order leaves the service order generator, does anything happen to it between the time it leaves the service order generator and the time it leaves SOCS except those edits you described to me?  A. Hopefully not. The objective is
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. You mentioned that for flowthrough, for orders received via fax or on paper, that the service rep builds the order and releases it to downstream systems, correct?  A. That's right. Q. Can you define for me what you mean by the service rep building an order? A. A local service request comes in, an LSR, local service request. That order can be faxed in or be delivered by overnight mail. The service rep's responsibility is to turn that into a true service order that meets the BellSouth definitions of service order. Field sizes, number of fields, what has to be populated, what's option, et cetera. They would use a service order generated program to build that order.  If it's an LNP order, they would use the LNP gateway. If it's not an LNP orders, they would use one of two systems: DOE, Direct Order Entry System, or SONGS. I don't know what that stands for. Service Order Negotiation System, I think.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	applied. If it passes those edits, it's then released to downstream provisioning systems?  A. Correct. Q. When does the order become assignable? When does it achieve assignable status?  A. I'm not sure what you mean by assignable. Q. Are you familiar with BellSouth's processes for building orders for its own customers, it's own retail customers?  A. No.  From SOCS down, it's the same process, but I'm not really familiar to talk to you about routine process, if those are the same systems.  Q. When the order leaves the service order generator, does anything happen to it between the time it leaves the service order generator and the time it leaves SOCS except those edits you described to me?  A. Hopefully not. The objective is that it's perfect.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. You mentioned that for flowthrough, for orders received via fax or on paper, that the service rep builds the order and releases it to downstream systems, correct?  A. That's right. Q. Can you define for me what you mean by the service rep building an order? A. A local service request comes in, an LSR, local service request. That order can be faxed in or be delivered by overnight mail. The service rep's responsibility is to turn that into a true service order that meets the BellSouth definitions of service order. Field sizes, number of fields, what has to be populated, what's option, et cetera. They would use a service order generated program to build that order.  If it's an LNP order, they would use the LNP gateway. If it's not an LNP orders, they would use one of two systems: DOE, Direct Order Entry System, or SONGS. I don't know what that stands for. Service	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	applied. If it passes those edits, it's then released to downstream provisioning systems?  A. Correct. Q. When does the order become assignable? When does it achieve assignable status?  A. I'm not sure what you mean by assignable. Q. Are you familiar with BellSouth's processes for building orders for its own customers, it's own retail customers?  A. No.  From SOCS down, it's the same process, but I'm not really familiar to talk to you about routine process, if those are the same systems.  Q. When the order leaves the service order generator, does anything happen to it between the time it leaves the service order generator and the time it leaves SOCS except those edits you described to me?  A. Hopefully not. The objective is

Page 3 of 3

# BellSouth Service Quality Measurements Performance Reports

# ORDERING

Report/Measurement:	
O-3. Flow-Through Error Analysis	·
Definition:	
, , , , , , , , , , , , , , , , , , , ,	as experienced by the LSRs that did not flow through and reach a
status for a FOC to be issued.	
Exclusions:	
Each Error Analysis is error code specific; therefore	exclusions are not applicable.
Business Rules:	
	LSRs, including supplements (subsequent versions) which are
	es (TAG, EDI, and LENS), that flow through and reach a status for a
	process does not include LSRs, which are, submitted manually (e.g.,
fax, and courier).	
Calculation:	
Σ Of errors by type Report Structure:	
	and a Managara in the descending and a large of the
code and provides the following:	r code). The report is in descending order by count of each error
	•
> Error Type (by error code)	
> Count of each error type	
> Percent of each error type	
> Cumulative percent	
> Error Description	
> CLEC Caused Count of each error code	
> Percent of aggregate by CLEC caused con	urit
> Percent of CLEC by CLEC caused count	
> BST Caused Count of each error code	
> Percent of aggregate by BST caused coun	it en en en en en en en en en en en en en
> Percent of BST by BST caused count	
Level of Disaggregation:	
Region  Data Retained Relating to CLEC Experience	Data Retained Relating to BST Experience
Report month     Total number of LSRs received	•
Total number of errors by type (by error code)	Total number of errors by type (by error code)      DET system arror
<ul> <li>Total number of errors by type (by error code)</li> <li>CLEC caused error</li> </ul>	▶ BST system error
> CLEC caused error	
Retail Analog/Benchmark:	
Not Applicable	

Revision Date: 02/22/00 (tm)

# BellSouth Service Quality Measurements Performance Reports

# LSR Flow-Through Matrix

PRODUCT	F.	COMPLEX	COMPLEX	PLANNED FALLOUT FOR MANUAL HANDLING	ED	TAG 2	LENS 994	LENS 3	COMMENTS
2 wire analog DID trunk port	No.					- <b></b>			
2 Wire analog nort		UNE	Yes	Yes	z	2	7		
Tod Son	Yes	UNE	2	Ž	}	:	2	z	
Swite 190N digital line side port	2	ONE	Yes	Yes	-	-	2	z	
2 Wile ISDN digital loop	8	CNE	Yes	2 4	2	z	Z	z	
3 Way Calling	Yes	N	2	\$	>	>	z	z	
4 wire analog voice grade loop	Yes	UNE	2 2	AN AN	> :	>	>	>	
4 Wire USU & PRI digital foop	ž	CNE	200	¥ .	>	>	Z	z	
4 wire DS1 & PRI digital loop	2	UNE	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	res	z	z	z	Z	
4 wire ISDN DSI digital trunk ports	2	UNE	200	res	z	z	2	z	
Accupulse	2	Yes	200	res	z	z	2	Z	
	2	INE	8 2	¥,	z	z	z	z	
	Va.	1 2	Sa	Yes	Z	z	Z	2	
Basic Rate ISDN	3 2	25/2	02	õ	>	>	>		
	2 00	200	Yes	Yes	Y	>	Z	- 2	
Call Forwarding-Variable	3 %	0 2	02	o Z	Υ	>	>	-	
Call Return	Na X	2 2	02	ON.	Υ	>	>	>	
Call Selector	Xex		ON.	2	Υ	>	>	·	
Call Tracing	Yes	2 2	No	<u>و</u>	<b>&gt;</b>	<b>&gt;</b>	>	<b> </b>   >	
Call Waiting	Yes	S	2 2	0	>	<b>-</b>	>	>	
Call Waiting Deluxe	Yes	No.	200	No.	-   - :	>	>	>	
	χes	2	2 S	2 2	<u> </u>	>	>	>	
	ş	Yes	Yes	1	<u> </u>	<b>→</b>	7	>	
DID WITH PBX ACT W	2	Yes	Xec	1	z	z	Z	z	
	2	300	55	1	<b>&gt;</b>	z	>	z	
Digital Data Transport	2	INF	Sec		<b>\</b>	z	>	2	
Directory Listing Indentions	2	- I	3		z	z	z	2	
Directory Listings Captions	2 2	2	2 3	1		٨	>	>	
Directory Listings (simple)	Yes	2 2	S	1		\ \	>	2	
		2	No	No O	` }	\ >	-		
								_	

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Service Quality Measurements Performance Reports

		Service	Quanty Mes	Measurements	erior	Performance Reports	eports		
DS3	ş	ONE	Yes	NA	Z	z	z	z	
DS1 Loop	Yes	UNE	Yes	Yes	>	>	z	Z	
DSO Loop	Yes	UNE	Yes	Yes	>	⊁	z	z	
Enhanced Caller ID .	Yes	No	No	No	>	>	<b>\</b>	>	
ESSX	S S	Yes	Yes	NA	Z	z	z	z	
Flat Rate/Business	Yes	S N	S N	No	γ	Υ	>	>	
Flat Rate/Residence	Yes	Š	No	No	Υ	⋆	٨	⋆	
FLEXSERV	ž	Yes	Yes	NA	Z	z	Z	z	
Frame Relay	ၟ	Yes	Yes	NA	z	Z	Z	Z	
FX	ş	Yes	Yes	NA	z	z	z	z	
Ga. Community Calling	Yes	No	ON	Š	>	⋆	>	≻	
HDSL	Ş	UNE	Yes	NA	z	Z	z	Z	
Hunting MLH	80	c/s e	S/O	Yes	>	λ	z	z	
Hunting Series Completion DM10	No.	C/S	S/O	Yes	>	>	>	>	
Hunting Series Completion	٥ ۷	S/O	S/O	Yes	<b>&gt;</b>	>	>	>	
INP RECTYPE B	Yes	UNE	No	No	٨	≻	z	z	
INP RECTYPE C	Yes	UNE	νo	No	٨	À	z	z	
LightGate	2	Yes	Yes	NA	Z	z	z	z	
Local Number Portability	Yes	UNE	Yes	No	λ	Y	z	Z	Yes - LENS, April 2000
LNP with Complex Listing	۶ ک	UNE	Yes	Yes	≻	╁	Z	z	
LNP with Partial Migration	2	UNE	Yes	Yes	٨	Ь	z	Z	
LNP with Complex Services	S S	UNE	Yes	Yes	Υ	Τ	z	Z	
INP to LNP Conversions	ટ	UNE	Yes	Yes	≻	У	z	z	
Measured Rate/Bus.	Yes	S	S S	S S	Υ	Ϋ́	Y	λ	
Measured Rate/Res.	Yes	S N	S S	S S	Υ	Ь	Y	<b>&gt;</b>	
Megalink	ટ્ટ	Yes	Yes	ΑN	z	Z	Z	z	
Megalink-T1	2	Yes	Yes	A'A	z	Z	Z	Z	
Memory Call	Yes	No	S S	Š	Y	λ	Y	λ	
Memory Call Ans. Svc.	Yes	No	No	No	Y	Ь	٨	>	
Multiserv	ટ	Yes	Yes	A A	z	Z	z	Z	
Native Mode LAN Interconnection (NMLI)	S O	Yes	Yes	Y Y	z	Z	Z	Z	
Off-Prem Stations	Š	Yes	Yes	NA	Ν	Z	z	z	
Optional Calling Plan	Yes	No	Ş	2	Y	Υ	≻	>	
Package/Complete Choice and area plus	Yes	No	No	No	>	<b>\</b>	<b>&gt;</b>	<b>&gt;</b>	

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L. South Service Quality Measurements Danks

		Service	Onality Mo	28 Mromonto	Dong	T			
Pathlink Primary Rate ISDN	S	Yes	Yes	Yes NA NA NA NA NA NA NA NA NA NA NA NA NA	2   2	Illance r	ceports		
Pay Phone Provider	2	2	S	Z AN	2   2 - -	z	2	z	
PBX Standalone ACT A,C, D	ટ્ટ	Yes	Yes	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	<b>z</b>  >	2 >	Z	z	
PBX Trunks	2	Yes	Yes	80->	- >	<u> </u>	<b>-</b>	z	
Port/Loop Combo	Yes	CNE	2 2	2	- >	>	>	2	
Port/Loop PBX	ž	S	2	2 3	- ; -	<b>&gt;</b>	z	z	Yes - LENS. April 2000
Preferred Call Forward	Yes	S S		res	<u> </u>	>	z	2	
RCF Basic	}     		2	2	<b>&gt;</b>	Υ	Å	>	
Remote Access to CF		ON	2	NA	z	z	z	Z	
Repeat Dialing	Sal	8	8	No	>	>	>	: >	
Ringmester	Yes	S.	2	N _O	>	>	>	- >	
Smothalt	Kes	ટ્ટ	No	8	>	>	·  >	-   =	
Smothall	ş	Yes	Yes	¥	Z	2	- 2	2   2	
Citientalive	ટ	Yes	Yes	ΑN	Z	2	2 2	z	
Speed Calling	Yes	No	S _N	2	  -	: >	≥ >	2	
Synchronet	S N	Yes	Yes	¥	∤	- >	-   =	- :	
I le Lines	٩ ۷	Yes	Yes	AN	-   2	-	z	2	
Touchtone	Yes	8	2	Š	<b> </b>	2 >	2	Z	
Unbundled Loop-Analog 2W, SL1, SL2	Yes	UNE	2	S S	-}	-	À	>	
WATS	8	Yes	Yes	NA NA	- 2	-	Z	Z	Yes - LENS, April 2000
XDSL Extended LOOP	οN	LINE	Yee			z	z	Z	
			3	5	2	Z	Z	Z	
					1				
Note 1: Planned Fallout for Manual Handling denote the complexity of the service.	ling de	notes those s	es those services that a	are electronically		submitted ar	nd are not in	tended to	and are not intended to flow through due to
Note 2: The TAG column includes those LSR subr RoboTAG.	LSR su	bmitted via							
			<del> </del>		1	+	1		
Note *: The LENS column denotes the ordering status of services prior to OSS 99.	dering	status of serv	ices prior			1			
			-		ľ	ŀ		j	
Note *: The LENS 99 column denotes the ordering	orderi	ng status of services	ervices		1	-	1		
1500 CO 33.								· ·	

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BeliSouth

when changing main TN on C activity, low volume – e.g. activity type T≈move, pending order review required, more than 25 business lines, restore or suspend for UNE combos, transfer of calls option for CLEC end user—new TN not yet posted to BOCRIS. All but the last one are unique to the migrations (although conversions-as-is flow through), class of service invalid in certain states with some TOS - e.g. gov't, or cannot be changed handling: Expedites from CLECs, special pricing plans, for denials - restore and conversion or disconnect and conversion both required, partial Note 5. For all services that indicate 'No' for flow-through, the following reasons, in addition to errors or complex services, also prompt manual Service Quality Measurements Performance Reports Note *: Services with C/S in the Complex Service and/or the Complex Order columns can be either complex or simple

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			Page 1
1	STATE OF NORTH CAROLINA	`	
2	UTILITIES COMMISSION		
	RALEIGH		
3			
	BEFORE THE NORTH CAROLINA UTILITIES COMMISSION		
4			
5	IN THE MATTER OF THE		
	INTERCONNECTION AGREEMENT		
6	NEGOTIATIONS BETWEEN AT&T		
	COMMUNICATIONS OF THE	Docket No. P-140,	Sub 73
7	SOUTHERN STATES, INC., TCG	Docket No. P-646,	Sub 7
ĺ	OF THE CAROLINAS, INC., and		
8	BELLSOUTH TELECOMMUNICATIONS,		
	INC., Pursuant to 47 U.S.C.		
9	Section 252		
	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~		
10			
11	DEPOSITION OF		
12	RONALD PATE		
13			
	July 20, 2000		
14			
Ì	9:06 a.m.		
15			
16	1200 Peachtree Street, N.E.		
17	Atlanta, Georgia		
18			
19	Arne' B. Davis, CCR-B-1475		
20			
21			
22			
.23		TO 1 131 000004	Th
24		Docket No. 000731- JMB-R29	1 F
25		Page 1 of 3	
1			

Ī			
	Page 38		Page 40
1	designate by various interfaces whether it	1	out. Does trigger a couple throughout where
2	can be submitted using that electronic	2	ones designed to flow through could actually
3	interface.	3	fall out as in footnote 5. For example, let
4	Q. So, as a CLP, I should be able	4	me find here for clarification purposes
5	to look at this table and determine which	5	well, you go by the first one, expedite from
6	types of the services and products that I	6	a CLEC, so an order that they have expedited
7	want to order for my customers, can only be	7	request that's been designed for flow
8	ordered manually. Correct?	8	through by the nature they expedited it
9	A. As well as electronically, yes.	Š	it's going to have to fall out. So we can
10	Q. So if I look in the fifth column	10	manually process it in order to try to meet
11	headed, Planned Fallout for Manual Handling,	lii	their request. So you understand exactly from
12	and I compare that information with the	12	what I was saying earlier, there are
13	various EDI, TAG, LENS '99 and LENS columns,	13	situations such as foot note 5.
13	I can tell whether I can order a product	14	Q. Seems to me, looking at footnote
15	electronically, but it will encounter design	15	5, and that flow through column, that
16	manual fallout?	16	
17	A. Yes.	17	footnote 5 is actually complying to all the
		18	yeses in that column, inside of that first
18	Q. This document also shows me what products and services that I might order that	19	no. Do you agree? I'm wondering if it's a
19	would encounter manual fallout for reasons	20	typo.
20	other than by design?	20	A. I see from your approach, the
21			person who authored this, I see from the way
22	A. I guess I'm trying to understand	22	you're looking at it now, the confusion it
23	the question. Manual fallout is supposed to	23	could create. To see if there might be a
24	be only by design. So I'm confused by the	24	better way more likely, it would be up
25	question.	25	there, besides the FT itself.
	Page 30	ŀ	Doga 41
1 2 3 4	Page 39 Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even	1 2 3 4 5	Page 41 Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm
4 5	 Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even 	2 3 4 5	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm
4 5 6	 Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? 	2 3 4 5 6	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just
4 5 6 7	 Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? A. None come to mind. It's either 	2 3 4 5 6 7	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and
4 5 6 7 8	 Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? A. None come to mind. It's either planned fallout flow through or there's an 	2 3 4 5 6 7 8	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and finding out.
4 5 6 7 8 9	Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? A. None come to mind. It's either planned fallout flow through or there's an error that results in that falling out. If	2 3 4 5 6 7 8 9	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and finding out. Q. So if I understand you correctly,
4 5 6 7 8 9	Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? A. None come to mind. It's either planned fallout flow through or there's an error that results in that falling out. If there's some other situation, I don't recall.	2 3 4 5 6 7 8 9	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and finding out. Q. So if I understand you correctly, though, footnote 5 is a list of conditions
4 5 6 7 8 9 10	Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? A. None come to mind. It's either planned fallout flow through or there's an error that results in that falling out. If there's some other situation, I don't recall. (Whereupon a discussion ensued off	2 3 4 5 6 7 8 9 10	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and finding out. Q. So if I understand you correctly, though, footnote 5 is a list of conditions that will result in design manual fallout,
4 5 6 7 8 9 10 11 12	Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? A. None come to mind. It's either planned fallout flow through or there's an error that results in that falling out. If there's some other situation, I don't recall. (Whereupon a discussion ensued off the record.)	2 3 4 5 6 7 8 9 10 11	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and finding out. Q. So if I understand you correctly, though, footnote 5 is a list of conditions that will result in design manual fallout, even though an item is ordered electronically
4 5 6 7 8 9 10 11 12	Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? A. None come to mind. It's either planned fallout flow through or there's an error that results in that falling out. If there's some other situation, I don't recall. (Whereupon a discussion ensued off the record.) Q. (By Ms. Rule) The second column	2 3 4 5 6 7 8 9 10 11 12	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and finding out. Q. So if I understand you correctly, though, footnote 5 is a list of conditions that will result in design manual fallout, even though an item is ordered electronically and was otherwise eligible for flow through;
4 5 6 7 8 9 10 11 12 13	Q. Does fallout for manual handling mean they have errors in them, too? A. Yes. Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically? A. None come to mind. It's either planned fallout flow through or there's an error that results in that falling out. If there's some other situation, I don't recall. (Whereupon a discussion ensued off the record.) Q. (By Ms. Rule) The second column is headed F/T. Is that supposed to be a	2 3 4 5 6 7 8 9 10 11 12 13	Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column? A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and finding out. Q. So if I understand you correctly, though, footnote 5 is a list of conditions that will result in design manual fallout, even though an item is ordered electronically and was otherwise eligible for flow through; correct?
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	Page 42		Page 44
1	will fall out for manual handling?	1	assume that special pricing plan? Are you
1	A. As a result of this discussion,	2	going to pay? There's things that have to
2 3	I'm having the same inclination. I would	3	be dealt with. That's what's unique about
4	like to reserve the right to talk to the	4	it.
5	author of this report. I understand what	5	Of course, it's difficult to get
6	they're intending to say. I've seen the	6	every little thing down here, when we're
7	report many times and looked at this document	7	using our best effort to explain it without
8	many times. It's never hit me the way it's	8	having a voluminous document.
9	hitting me now.	9	Q. Are you familiar with the
10	Q. Just to walk through an example,	10	BellSouth's flow through matrix for OSS199?
11	the second product, entry two, wire analog	11	The first page is an E-mail. Do you see
12	port, said, yes, it should flow through?	12	that?
13	A. Correct.	13	A. Yes.
14	Q. But if I understand footnote 5	14	Q. Ms. Williamson is an AT&T
15	correctly, it should flow through, unless one	15	employee?
16	of these 12 or 13 things listed in footnote	16	A. That's correct.
17	5 are present, in which case it will fall	17	Q. Look down on the original
18	out?	18	transmittal where it was sent to Ms.
19	A. That is the way I interpret it,	19	Williamson.
20	too.	20	A. Starts with Original message
21	Q. There's another question we had	21	from Beverly Shelton Williams.
22	about footnote 5. It says - the very last	22	Q. Who is she?
23	sentence says, All but the last one are	23	A. A member of the account team that
24	unique to CLEC. What does that mean?	24 25	serves AT&T.
25	A. Well, I need to talk to the	25	Q. She was a BellSouth employee?
	Page 43		Page 45
1	- 1	1	_
1 2	author on that as well. They were trying to	1 2	A. Yes.
2	author on that as well. They were trying to categorize these as unique; and, frankly,	2	A. Yes. Q. So it appears from this e-mail
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Bradbury,J M (Jay) - LGA

From:

irwilliamson@att.com

Sent:

Friday, October 20, 2000 12:43 PM

To:

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gpterry@att.com; bradbury@att.com; sharonnorris@att.com; eppsteiner@att.com;

campbekj@att.com; belangda@att.com; smorrow@broadband.att.com;

dobeck@broadband.att.com; crcannon@att.com; watersre@att.com; bcsturdevant@att.com;

deberger@att.com; waldbads@att.com

Subject:

FW: Order Backlog

Importance:

High

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> ----Original Message----
           Williamson, Jill R, NCAM
> From:
           Friday, October 20, 2000 12:30 PM
> Sent:
> To: 'Jan M. Burriss'
> Cc: 'Sandra C. Jones'
> Subject: Order Backlog
> Importance:
                  High
> Jan,
>
> I've received calls from several of our workcenters this week around an
> apparent backlog of orders at the LCSC. I spoke with Sandra earlier this
> week and found that the LCSC is backlogged due to the addition of the
> Broadband orders in the Atlanta LCSC.
> We have orders that were sent a week ago that have yet to receive a
> response. When we call the LCSC to get the orders turned around, they
> will only accept two PONs per call. Thus our workcenter must spend a
> great deal of time calling the LCSC just to get a response on the orders.
> I called Ron Moore today to request that he accept a list of the PONS to
> be worked instead of us calling back two PONS at a time (Broadband has 36
> orders backlogged). I'm waiting on Ron's response. Additionally, I don't
> understand why BellSouth is having this problem when it knew the volume of
> orders it would be transitioning from Birmingham to Atlanta. I'd
> appreciate your providing me with a plan to remedy the current backlog and
> BellSouth's plan to correct the issue going forward. I'd appreciate a
> response by close of business today.
> Sincerely,
> Jill Williamson
```

Bradbury, J M (Jay) - LGA

From:

jrwilliamson@att.com

Sent:

Monday, November 06, 2000 12:58 PM

To:

mlacy@att.com; bseigler@att.com; gpterry@att.com; eppsteiner@att.com; sharonnorris@att.com; bradbury@att.com; bobik@att.com; dreinig@att.com;

deberger@att.com; watersre@att.com; dobeck@broadband.att.com;

smorrow@broadband.att.com; waldbads@att.com; campbekj@att.com; crcannon@att.com

FW: LCSC backlog

Subject:

----Original Message----

From: Jan.Flint@bridge.bellsouth.com [mailto:Jan.Flint@bridge.bellsouth.com] Sent: Friday, November 03, 2000 3:27 PM

To: Williamson, Jill R, NCAM

Cc: Jan.Burriss1@bridge.bellsouth.com; Sandra.Jones5@bridge.bellsouth.com

Subject: LCSC backlog

Jill,

I wrote this on Monday and thought I sent it to you but I just found it in out box -- sorry.

I talked to Ron Moore today about the FOC backlog that AT&T has experienced in the last two weeks.

Ron attributed the MediaOne fall-out and backlog to a directory listings problem in our LEO system. There was also a problem with inappropriate usage

of commas in MediaOne's LSRs that caused additional orders to fall-out for manual handling. The LCSC could not easily handle the large number of orders

that required manual handling.

This past week, order volume overwhelmed the center. After working this past Saturday, Ron feels that by close of business today they will have recovered and will be current on their pending LSRs.

To address the order volume issues, the LCSC will add 20 service reps to its staff on November 13th and will add another 20 in December.

I hope this information minimizes AT&T's concerns on recent FOC cycle-time.

Thanks,

Jan

L'NY PLOW-IMROUGH DATA													
	May-TAG	May-EDI	Jun-TAG	Jun-ED!	Jul-TAG	JuleDI	Aug-TAG	Aug-EDI	Sep-TAG	Sep-FD	Sep-TAG Sep-FD! Oct-TAG	OH-FD	
•	1206	5263	2509	8899	2015	6025	1646	9153	4	13285	2229	5	
	734	2093	1124	2795	1051	2286	720	2991	258	-			
Validated LSRs	382	3071	1289	3652	915	3554	894	5552					
Faig	122	1437	247	1608	171	1484	334	2768	157	5247			
Flow Through Issued SOs	130	1152	654	1657	452	1666	376	2249		3507			
% Manual Fallout - LSRs	819	40%	45%	45%	52%	38%	44%	70EE					
% BellSouth System Failure - LSRs	10%	27%	10%	24%	86	25%	20.5	308					
% BellSouth System Failure - VLSRs	SRs 32% 47% 19% 44% 19% 42% 37% 50%	47%	19%	44%	19%	42%	37%	20%					
% Total BellSouth Fallout + Failure - LSRs	71%	67%	55%	%99	819	63%	64%	63%	88	A594	7497	2367	
% Maximum One-Touch CLP Orders	29%	33%	45%	33%	39%	37%	36%	37%					

Manual Fall Out Manual Fall Out Validated LSRs BellSouth Caused System Failure Flow Through Issued SOs W Manual Fallout - LSRs W BellSouth System Failure W Manual Fallout - LSRs	May-LENSMay-TAG May-EDI Jun 2219 15053 1901 370 2794 702 1703 10024 895 475 1882 430 628 6838 265 17% 19% 37% 21% 13% 23%	y-TAG May 15053 2794 10024 1882 6838 19% 13%	y-EDI 34r 1901 702 895 430 265 37% 23%	HENS Jur 2082 491 1302 469 578 24% 23%	LIN-TAG Jun-TAG Jun-TAG Jun-TAG Jun 45123 6676 33651 6872 24121 15% 15%			Jul-TAG Jul-TA	M-EDI A 1988 808 962 373 524 41%	Aug-LENS Aug-TAG A 7958 38653 1538 5728 4597 25974 1796 2265 17968 2356 17968 19% 15% 23% 17%	ug-TAG Au 36853 3728 25974 6206 17968 16%	Aug-EDI Si 3085 1059 1767 191 1525 34%	Sep-LENS Sep-TAG 7879 28781 1824 6071 5130 18784 1718 4099 3130 13661 23% 21%			Octlens Operations of 9930 1975 6212 1884 3915	5 Oct-TAG O 58758 10736 39020 8974 28187	Oct-EDI 3050 1742 961 110 766
	28% 38% 62%	19% 31% 69%	48% 80% 40%		20% 30% 70%	24% 39% 81% 49%	21% 35% 39% 61%	21% 21% 34% 66%	19% 39% 59% 41%	23% 39% 42% 58%	17% 24% 32% 68%	6% 11% 41% 59%	22% 33% 45% 55%	14% 22% 35% 65%	5% 59% 82% 18%	19% 30% 39% 61%	15% 23% 34% 66%	

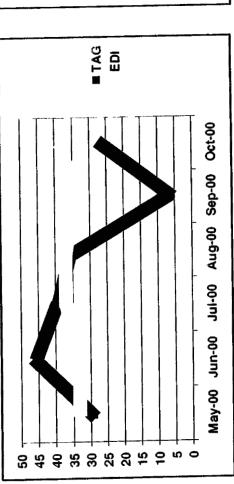
BUSINESS FLOW-THROUGH DATA Total Mech LSRs Manual Fall Out Validated LSRs BellSouth Caused System Failure Flow Through Issued SOs	May-LENSMay-TAG May-EDI Jun- 6524 2015 1360 1367 1055 799 4304 756 446 1409 220 185 2424 413 214	lay-TAG Ma 2015 1055 756 220 413	ay-EDI Ju 1360 799 446 185	LENS . 6739 1175 4460 1413 2647	Jun-TAG Jun-EDI 2427 1250 1343 764 725 403 225 134 398 241	In-EDI Ju 1250 764 403 134 241	Ju-LENS Ju 6702 44 1312 13 4447 44 1331 41 2747	Jul-TAG Ju 2224 1105 861 169 422	Jul-EDI At. 1079 658 328 141	Aug-LENS Aug-TAG , 10438 1182 2059 476 6762 539 2552 164 3605 312	1182 176 476 539 164 312	Aug-EDI Sel 1619 970 539 224 256	Sep-LENS Sep-TAG S 9168 1056 2207 442 5725 463 2199 138 3171 299	-TAG Sep 1056 442 463 138 299	Sep-EDI Oct 1221 727 403 122 240	Oct-LENS Oct-TAG 10826 1180 2576 500 6908 445 2440 128 3855 257		Oct-EDI 1644 1083 447 113 250
% Manuel Fallout - LSRs	21%	52%	59%	17%	55%	61%	20%	50%	61%	20%	40%	60%	24%	42%	60%	25%	42%	66%
% BellSouth System Failure - LSRs	22%	11%	14%	21%	9%	11%	20%	8%	13%	24%	14%	14%	24%	13%	10%	23%	11%	7%
% BellSouth System Failure - VLSRs	33%	29%	41%	32%	31%	33%	30%	20%	43%	38%	30%	42%	38%	30%	30%	36%	29%	25%
% Total BeltSouth Fallout + Feiture - LSRs % Maximum One-Touch CLP Orders	43%	63%	72%	38%	65%	72%	39%	57%	74%	44%	54%	74%	48%	55%	70%	47%	53%	73%
	57%	37%	28%	62%	35%	28%	61%	43%	26%	56%	47%	26%	52%	45%	30%	53%	47%	27%

Total Mech LSRs 139160 58350 3076 Manual Fall Out 7806 1366 230 Validated LSRs 12166 54352 2535 BellSouth Caused System Failure 710029 51353 1817	* Manual Fallout - LSRs 6% 2% 7% ** BeilSouth System Failure - LSRs 7% 4% 19% ** BeilSouth System Failure - VLSRs 8% 4% 23%	% Total BellSouth Fallout + Fallune - LSRs 12% 6% 26% % Maximum One-Touch CLP Orders 88% 94% 74%
•	2 % % X	13%
Mun-LENS Jun-TAG . 14567 161459 1704 1959 125300 56223 9238 2352 113640 52909	60 4 4 % % %	7% 93%
392 392 284 3233 801 2223	7% 20% 25%	27% 73%
136989 136989 8162 118230 7965 108205	6% 7%	12% 88%
Jul-TAG Jul 57961 1537 52030 1799 49208	3% 3% 80 80 80 80 80 80 80 80 80 80 80 80 80	6% %
Jul-EDI Auy 4520 1 449 3624 1 798 2578 1	10% 18% 22%	28% 72%
wg-LENS Aug 165707 13833 135162 13818 119378	8% 8% 10%	17% 83%
Aug-TAG Aug 57865 4062 49185 2042 46469	% % % % % %	11% 89%
Aug-EDI Sep 7036 1 442 5445 1; 1772 3261 1	6% 25% 33%	31% 69%
Sep-LENS Sep-TAG (151901 47810 11595 1488 12214 42279 11242 1522 113417 40432	8% 9%	15% 85%
-TAG Sep 47810 1488 42279 1522 40432	3% 4% 4%%	% % %
Sep-EDI Oc 7142 - 365 5643 - 2121 2986 -	5% 30% 38%	35% 65%
Oct-LENS Oct-TAG 166029 65976 10619 2099 140390 56601 10122 1433	6 % 8 % 7 %	12% 88%
FTAG Oc 65976 2099 56601 1433 53734	3,8%	5% 85%
Oct-EDI 7641 453 5394 2202 2755	6% 29% 41%	35% 65%

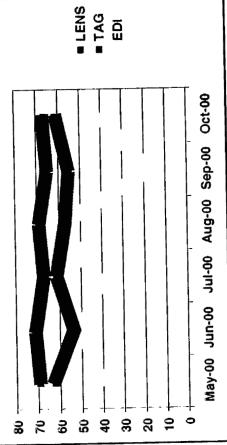
Docket No. 000731-TP JMB-R31 Page 4 of 4

Percent maximum flow-through **CLEC orders**

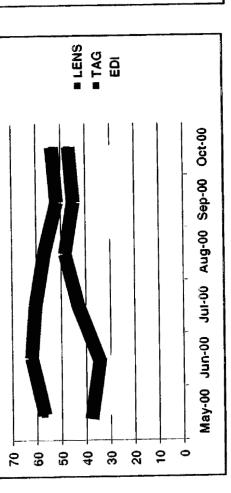




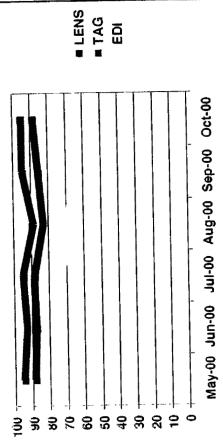
UNE – benchmark 85%



Business resale – benchmark 90%



Residence resale - benchmark 95%



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Percent maximum flow-through CLEC orders

Туре	Interface/ product	May 2000 %	June 2000 %	July 2000 %	August 2000 %	September 2000 %	October 2000 %
022	SNA	ĄZ	AN	AN	NA	AN	NA
Benchmark 85%	TAG	53	45	39	36	9 3	92
	EDI	33	33	37	37	35	22
	S S S S S S S S S S S S S S S S S S S	62	54	61	58	55	61
Donotmark 85%	TAG	69	70	99	89	65	99
Delicinian ou /e	EDI	40	49	41	59	18	39
	240	67	69	61	56	52	53
Business resale	NA P	27	25.	43	47	45	47
Benchmark 90%	B I	788	28	26	26	30	27
		00	22	88	83	85	88
Residence resale	LENG	80	200	95	88	94	95
Benchmark 95%	ED	47	73	72	69	65	65

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CLEC Aggregate Data / AT&T Data — Percent of Total Mechanized LSRs

Product	LPN	UNE	Business	Residence
Measure /	CLEC/ AT&T	CLEC/ AT&T	CLEC/ AT&T	CLEC/ AT&T
Month				
% Designed	Manual Fallout			
May	44 / 67	20 / 62	33 / 0	5 / N A
June	43 / 74	16 / 60	32 / 30	6 / NA
July	42 / 81	20 / 49	31 / 59	5 / NA
August	34 / 84	17 / 81	26 / 83	8 / NA
September	27 / 74	23 / 76	29 / 9	6 / NA
October	28 / 74	20 / 80	31 / 15	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
August	29 / 0	17 / 8	22 / 8	8 / NA
September	39 / 0	15 / 16	21 / 36	7 / NA
October	36 / 1	15 / 7	20 / 15	6 /NA
Total % Fallo	out Caused By B	ellSouth		
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
August	63 / 84	34 / 89	48 / 91	16 / NA
September	66 / 74	38 / 92	50 / 45	13 / NA
October	64 / 74	35 / 87	51 / 30	11 / NA
Maximum Po	ossible % 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
August	37 / 16	66 / 11	52 / 11	84 / NA
September	34 / 26	62 / 8	50 / 55	87 / NA
October	36 / 26	65 / 13	49 / 70	89 / NA

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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 <u>no impact</u> 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 <u>operational</u> flow-through performance delivered by BellSouth's interfaces as designed and operating.

BellSouth Achieved Percent Flow-through = (Issued SO's) ÷ ∑ 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 <u>could be</u> 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) ÷ ∑ Total Mech LSR's) - [(Manual Fallout) + (Auto Clarification) + (CLEC Caused Fallout)] X 100

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Actual Flow-Through Results EDI Interface CLEC Aggregate / AT&T

Product	LF	PN	UI	NE	Busi	ness	Resid	dence
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
August	25	0	49	3.2	16	0	46	NA
September	26	0	2	3.8	20	27	42	NA
October	30	2	25	4.6	15	23	36	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
August	28	0	55	3.5	18	0	60	NA
September	28	0	2.3	4	22	38	55	NA
October	33	3	29	4.8	17	43	39	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
August	45	0	89	29	53	0	65	NA
September	40	0	26	19	66	43	58	NA
October	46	67	87	40	69	60	56	NA

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Aggregated Interface and Product Results

Measure	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct
Basic	82	78	76	74	76	73	70	69	69	68
Achieved	89	86	84	83	84	82	82	77	78	79
Potential	95	93	92	92	91	90	91	87	88	89

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%

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%

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Disaggregated Interface - Disaggregated Product Results July 2000

F	Product	LPN	UNE	Business	Residence
	easure/ erface				
Ba (70	sic))				
•	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
Po (91	tential)				
•	EDI	53	58	51	76
•	TAG	72	75	71	96
•	LENS	_	61	67	93
Vo	lumes				
•	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%					

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Disaggregated Interface - Disaggregated Product Results August 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (69)				
• EDI	25	49	16	46
• TAG	23	49	26	80
• LENS	-	30	35	72
Achieved (77)				
• EDI	28	55	18	60
• TAG	26	60	33	88
• LENS	-	41	44	81
Potential (87)				
• EDI	45	89	53	65
• TAG	52	74	66	96
• LENS	-	57	59	90
Volumes				
• EDI	9,153	3,085	1,619	7,036
• TAG	1,646	36,853	1,182	57,865
• LENS	-	7,958	10,438	165,707
• Total	10,799	47,896	13,239	230,608
LEO Total =	291,743 Good =	226;657 Bad	= 65,086 %	Bad = 22%

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Disaggregated Interface - Disaggregated Product Results September 2000

	Product	LPN	UNE	Business	Residence
In	easure/ terface				
•	asic 9)				
•	EDI	26	2	20	42
•	TAG	1	47	28	84
•	LENS	-	40	35	75
Achieved (78)					
•	EDI	28	2	22	55
•	TAG	1	57	34	93
•	LENS	-	47	42	83
P(otential 8)				
•	EDI	40	26	66	58
•	TAG	2	77	68	96
•	LENS	-	65	59	91
Vo	lumes				
•	EDI	13,28	5 1,4	1,22	7,142
•	TAG	46			
•	LENS		- 7,8	9,16	
•	Total	13,74			5 206,853
LEO Total = 256,381 Good = 199,711 Bad = 56,670 % Bad = 22%					

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Disaggregated Interface - Disaggregated Product Results October 2000

Product	LPN	UNE	Business	Residence
Measure/ interface				
Basic (68)				
• EDI	31	25	15	36
• TAG	20	48	22	81
• LENS	-	39	36	76
Achieved (79)				
• EDI	33	29	17	39
• TAG	21	59	29	94
• LENS	-	50	43	86
Potential (89)				
• EDI	46	87	69	56
• TAG	42	76	67	97
• LENS	-	67	61	93
Volumes				
• EDI	18,571	3,050	1,644	7,641
• TAG	2,229	58,758	1,180	65,976
• LENS	-	9,930	10,826	166,029
• Total	20,800	71,738	13,650	239,646
LEO Total = 325,034 Good = 235,055 Bad = 89,979 % Bad = 24%				

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