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March 18, 2002

BY HAND DELIVERY

Blanca S. Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

    Re: Docket No. 960786A-TL and 981834-TP

Dear Ms. Bayó:

Enclosed for filing are the original and fifteen copies of the Post-Workshop Comments on Behalf of AT&T Communications of the Southern States, LLC., TCG South Florida, Inc., and AT&T Broadband Phone of Florida, LLC., Covad Communications, Florida Digital Network, ITC^DeltaCom, Inc., KMC Telecom, Inc., WorldCom, Inc., and Network Telephone.

By copy of this letter, this document has been provided to the parties on the attached service list. Due to its voluminous nature, the service copies do not include Exhibit 6, which is the red-lined version of the Change Control Process document submitted to the Georgia Public Service Commission on January 30, 2002. If you need a copy of this exhibit, please contact the undersigned.

Very truly yours,

Richard D. Melson

RDM/jlm
Enclosures
cc: Parties of Record

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth Telecommunications,)
Inc.'s entry into interLATA services pursuant to)   Docket No. 960786-A-TL
Section 271 of the Federal Telecommunications)
Act of 1996)
)
Petition of Competitive Carriers For Commission Action)
To Support Local Competition In BellSouth)   Docket No. 981834-TP
Telecommunications, Inc.'s Service Territory)

Filed: March 18, 2002

POST-WORKSHOP COMMENTS ON BEHALF OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC., TCG SOUTH FLORIDA, INC., AND AT&T BROADBAND PHONE OF FLORIDA, LLC; COVAD COMMUNICATIONS; FLORIDA DIGITAL NETWORK; ITC^DELTACOM, INC.; KMC TELECOM, INC.; WORLDCOM, INC.; AND NETWORK TELEPHONE

Pursuant to the Florida Public Service Commission's (the "Commission's" or the

"PSC's") request, AT&T Communications of the Southern States, LLC., TCG South Florida,

Inc., and AT&T Broadband Phone of Florida, LLC ("AT&T"); Covad Communications

("Covad"), Florida Digital Network ("Florida Digital"), ITC^DeltaCom, Inc. ("ITC"), KMC

Telecom, Inc. ("KMC"), WorldCom, Inc. ("MCI"); and Network Telephone (collectively

"ALECs") hereby submit their consolidated Post-Workshop Comments in the above-referenced

dockets. ALECs have prioritized[1] the issues discussed in the comments within each domain.

I.   INTRODUCTION

The February 18, 2002, workshop revealed numerous OSS issues that continue to thwart

ALECs' ability to compete effectively in Florida,[2] and demonstrate that BellSouth's Operational

Support System ("OSS") continues to fail to provide the service and support necessary for

CLECs to compete with BellSouth on a level playing field.[3]   The workshop also revealed that in

certain critical areas like change management, BellSouth simply does not understand or does not

want to understand ALECs' needs and concerns. The Commission should not recommend 271

approval until the OSS problems identified by ALECs have been resolved.

For each domain, ALECs have identified deficiencies within BellSouth's OSS that

cripple their ability to compete and that must be corrected promptly. ALECs discuss these issues

in priority order. Until these issues are addressed, and the implemented solutions verified and

audited to insure compliance, BellSouth's systems will continue to discriminate against ALECs

and the goal of local competition in Florida will be thwarted. Recognizing this Commission's

desire to conduct a constructive exercise, ALECs propose solutions for each of the OSS

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[1] The prioritization presented in these comments is the majority view of the ALECs participating in these comments. Accordingly, individual ALECs may have differing views regarding the priority certain issues should be assigned. Attached as Exhibit 1 is a chart identifying the individual prioritization by ALEC of these issues.

[2] The OSS deficiencies identified in the workshop and these comments are those that most impact ALECs' ability to compete. Some of these deficiencies are being considered in connection with the on-going Florida OSS test, but many of them are not. These comments should not be read to assert that these are the only OSS deficiencies in BellSouth's systems.

[3] This view is supported by BellSouth's most recent Monthly State Summary ("MSS") report. For January 2002, BellSouth failed to provide nondiscriminatory support for 20% of the submetrics which had both a performance standard and ALEC activity.

deficiencies described below. ALECs can only agree with the Commission's sentiment that now is the time for solutions to these chronic problems that threaten ALECs' viability in Florida.

II. PREORDERING PROBLEMS PERSIST

As this Commission is aware, preordering "is potentially the most critical piece of the entire OSS process."[4] Yet, the testimony presented at the workshop demonstrates BellSouth's OSS remain deficient in this important area. For example,

- BellSouth does not provide ALECs the ability to integrate preordering and ordering functions at parity with its retail operations;

- BellSouth's Customer Service Records ("CSRs") are incorrect in several important aspects;

- ALECs cannot view and resolve pending service orders;

- BellSouth does not provide ALECs' Facilities Reservation Numbers ("FRNs") via EDI at no cost;

- EDI remains unavailable for preordering; and

- LFACs continues to be unavailable for certain ALECs and fails to contain accurate and complete facilities information.

These important issues must be resolved to ensure that BellSouth provides the nondiscriminatory access to its OSS mandated by the Telecommunications Act of 1996.[5]

A. BellSouth Does Not Provide ALECs the Ability to Integrate Preordering and Ordering Functions At Parity (Priority 1)

1. The Problem

As ALECs explained during the workshop, BellSouth still does not provide the parsing functionality necessary to achieve successful, reliable, and efficient integration of preordering

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[4] Tr. at 25.

[5] Pub. L. No. 104-104, 110 Stat. 56 (1996), codified at 47 U.S.C. § 251 *et seq.*

and ordering functions with a reasonable expenditure of ALEC programming resources.[6] While

BellSouth implemented what it claims to be acceptable CSR parsing for ALECs on January 5,

2002,[7] significant problems exist with this "implementation." These deficiencies include

BellSouth's failure to provide important business rules related to the parsing release according to

the timeframe specified in BellSouth's Change Control Process ("CCP"); a lack of stability in the

implementation of the parsing software itself; delayed or inadequate workarounds for identified

defects; and failure to provide a fully-fielded parsed CSR.

        a.   *BellSouth did not provide ALECs timely business rules*

BellSouth admits that it did not provide the business rules for the parsing software

according to the time frame set forth in its CCP.[8] As several ALECs explained at the workshop,

this delay prevented them from testing with BellSouth as soon as the software was released.[9]

Before ALECs could use the software BellSouth provided, ALECs needed to make substantial

coding changes to their systems in order to run BellSouth's new software.[10] Because BellSouth

provided its business rules late, ALECs could not complete their coding efforts prior to the

release. Consequently, ALECs' ability to test and use the new parsing functionality was delayed.

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[6] BellSouth points to ITC as evidence that ALECs can build their own parsing engines. Tr. at 36. As ITC explained, however, BellSouth's implication that ITC "can just parse [its] CSR and do wonderful things with it is really inaccurate." Tr. at 19. Indeed, under ideal circumstances, ITC's parsing success rate is only as high as 70%. *Id.*

[7] BellSouth admits that its January release was flawed and continues to be plagued by software defects. These problems will not be resolved until April or May at the earliest. Tr. at 13.

[8] Tr. at 37.

[9] *See e.g.*, Tr. at 12, 19.

[10] Tr. at 19.

BellSouth attempts to minimize and to excuse this delay by rationalizing that the "information was provided in other forums and in other documents sufficient for an ALEC to really have developed their system and to be ready to test it."[11] Indeed, BellSouth claims that the new pre-ordering rules are largely a "restatement" of the BellSouth TAG/API Guide ("Guide") that BellSouth published on November 19, 2001.[12] These attempted justifications lack factual support.

Prior to issuance of the pre-ordering rules on December 15, 2001, ALECs made clear to BellSouth – and BellSouth did not dispute – that the then-existing BellSouth documentation was inadequate to enable them to perform the necessary software coding. Furthermore, the Guide did not contain the specifications that ALECs needed to code their systems to reflect the new parsed CSR functionality. As AT&T pointed out to BellSouth after receiving the Guide, the document did not even contain fields that BellSouth had previously defined as required, or define how various lists of information on the CSR (such as telephone numbers and listed names) were related.[13] Accordingly, ALECs could not have developed software to utilize BellSouth's parsed data and have been ready to test it without BellSouth's final business rules.

>   b.   BellSouth's parsing software is not stable and BellSouth's
>   workarounds are inadequate

Since BellSouth first released its parsing software, 24 notices of defect have been issued. BellSouth has recently addressed a number of those defects, but at least 7 of these identified

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[11] Tr. at 37-38.

[12] Tr. at 38-39.

[13] *See* electronic mail message from Bernadette Seigler (AT&T) to BellSouth Change Control Manager, dated November 20, 2001 (attached as Exhibit 2); electronic mail message from Bernadette Seigler to BellSouth Change Control Manager, dated November 19, 2001 (attached as Exhibit 3).

defects remain outstanding.[14] BellSouth has categorized the remaining 7 defects as "low

impact."[15] Although BellSouth has instituted what it calls "workarounds" to address the parsing

software's deficiencies,[16] these workarounds, published three days before the workshop, place a

significant burden on ALECs. Each requires ALECs to manually determine if the CSR they

have retrieved is impacted by a defect, or else risk rejection of the Local Service Request

("LSR"). If impacted by the defect, the ALEC must take additional manual action to ascertain

the correct information necessary to complete the LSR. The seven defects that cause this

additional work are not scheduled to be corrected until March 23, 2002, and there is no assurance

that BellSouth's flawed systems development process will result in this new release working.

Thus, although BellSouth contends it has implemented CSR parsing, that parsing is effectively

unavailable for ALECs retrieving CSRs.

> c. BellSouth's software does not provide ALECs with a fully-fielded
>   parsed CSR

Setting aside the technical problems associated with BellSouth's parsing software,

BellSouth's CSR parsing release fails to provide fully-fielded parsed CSRs. At least eleven

fields for which there is data present in the CSR are not included in parsed format. These are

fields ALECs have requested specifically.[17] Other Incumbent Local Exchange Carriers

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[14] Tr. at 12, 36.

[15] Tr. at 37.

[16] Under the Change Control Process ("CCP"), BellSouth is required to publish workarounds for defects classified as "low impact" within three business days. The defects were all submitted to the CCP on January 31, 2002, while the workarounds were not published until February 15, 2002.

[17] The 11 fields ALECs have requested are: **TOS** – Type of Service, **NAME** – End User Name (not for directory delivery), **LST** – Local Service Termination, **DGOUT** – DID Digits Out, **HNTYP** – Hunting Type, **HTSEQ** – Hunting Sequence, **SGNL** – Signaling, **STYC** – Style Code, **TOA** – Type of Account, **LNPL** – Listed Name Placement, and **BRO** – Business/Residence Placement Override.

("ILECs"), like SBC and Verizon, provide these fields in parsed format. Currently BellSouth only has scheduled to implement parsing for two of these fields.[18]

2. Proposed Solutions

ALECs have been requesting a parsing functionality at parity with that enjoyed by BellSouth's retail operations since September 1998, yet this function is still not fully available to ALECs.[19] The solution for this problem is simple. BellSouth has been given ample opportunity to fix these problems on its own. Given its continued resistance to providing Florida ALECs

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[18] In February, BellSouth issued change requests CR0651 and CR0652 announcing plans to provide parsing for six of these fields in March. The change requests were initially published on February 7. On February 12 BellSouth declared these changes were regulatory mandates based on this Commission's June and September 2001 Orders in Docket No. 000731. BellSouth scheduled the change requests for implementation on March 23, 2002. Parsing for the six fields should have been provided in BellSouth's January 5, 2002 release of its CSR parsing functionality. On February 21, BellSouth announced that it had decided to reclassify these change requests as ALEC initiated, that it was not scheduling the implementation of the four fields associated with CR0652, and insisted that the ALECs vote concerning the implementation of the two fields associated with CR0651. CR0651 is now scheduled for implementation on March 23, 2002.

[19] BellSouth was originally ordered to provide parsing by the Florida Public Service Commission ("FPSC") in an order dated June 28, 2001. In that order, the FPSC stated:

> We agree with AT&T that data should be parsed and should be available to AT&T at the same level BellSouth provides itself. In the interim, in order to accomplish parsing themselves, field delimiters and the related rules to apply those delimiters must be provided to the ALEC upon request.
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> * * *
>
> Reviewing the dates indicated above, it appears the implementation date for parsed CSRs has been delayed for reasons that are not adequately explained. As noted, the issue of parsing was first brought up in September 1998 and a year later was prioritized for implementation in 2000. In March 2000, the status of the parsing issue was significantly changed when it was changed from being targeted for actual implementation (April 20, 2000) to merely being studied (subteam being formed to perform planning and analysis). June 2000 saw parsing as the number one pre-ordering issue in the CCP, while in September and December 2000 the implementation dates were again moved back. We find these slippages are unreasonable.

See Order No. PSC-01-1402-FOF-TP, issued June 28, 2001, in FPSC Docket No. 00731-TP, *In re Petition by AT&T Communications of the Southern States for Arbitration of Certain Terms and Conditions of a Proposed Agreement With BellSouth Communications, Inc., Pursuant to 47 U.S.C. § 252*, pp. 117-119. BellSouth, however elected to ignore the FPSC's order (most likely because the order did not set a timetable for implementation).

with service that is consistent with BellSouth's retail operations, the time has now arrived for the Commission to require BellSouth to implement fully-fielded parsing 20 business days following the Commission's order. The Commission also should require BellSouth to correct all other future defects in its parsing software within 20 business days of their verification.[20] After these steps are complete, this Commission should require KCI to audit ALECs' parsing capability as part of the on-going third-party OSS test. This Commission should establish a date certain for the results of KCI's investigation.

B.   BellSouth's Customer Service Records Are Inaccurate (Priority 2)

   1.   The Problem

As the workshop revealed, another BellSouth OSS deficiency that greatly handicaps the ALEC community is that BellSouth's CSRs are inaccurate.[21] ALECs have identified three causes for BellSouth's inaccurate CSRs. First, the CSR does not agree with the information in BellSouth's RSAG and switch databases. Second, the pre-migration CSR does not accurately reflect what is on the customer's line. Third, BellSouth fails to update the post-migration CSR on a timely or accurate basis. These problems lead to frustrated and angry Florida consumers, and have a chilling effect on ALECs' ability to compete.

The CSR is the only available source for the information necessary to pre-qualify a customer for ALECs' services. The CSR is supposed to contain an accurate record of the customer's existing services, equipment, and directory listing. To better understand the problems that can be caused by CSR inaccuracies, take—for example—a customer who requests

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[20] The 20 business day interval requested here is consistent with the ALEC's requested implementation interval for the correction of "medium" impact defects discussed below in the section regarding the Change Control Process.

[21] Tr. at 21-22, 25-26.

that his service be switched from BellSouth to an ALEC with all existing features and services. The customer expects that all of the services he enjoys, such as call waiting or hunting, will be available after his service is migrated to the ALEC. BellSouth's CSR, however, often fails to provide an accurate list of the services on that customer's account,[22] and when the customer migration from BellSouth occurs, the services not listed on the CSR will be lost. Understandably, this causes anger and frustration on the part of the customer who expects to receive the same services he had with BellSouth. The customer will contact the ALEC to restore the missing services.

However, once the migration has occurred, ALECs can only make changes to their customer's service once the post migration CSR is updated. The post migration CSR update does not occur until BellSouth updates its billing systems. The update of BellSouth's billing systems and the post migration CSR can not occur until all associated internal BellSouth service orders are determined to be error free. When this process is delayed ALECs are unable to make changes to the customer's service. ALEC's have no way to know that BellSouth's internal process has been delayed.

When the ALEC issues new LSR to restore the services lost as a result of the initial inaccuracy of the CSR, or BellSouth's failure to properly implement the ALEC's LSR, that LSR will be rejected if the post migration CSR has not been updated or has been updated inaccurately. Manual intervention by BellSouth service representatives in the LCSC and billing center is required to correct the CSR and issue the orders to restore the proper customer service. This of course causes further delay, customer frustration and dissatisfaction.

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[22] Tr. at 25.

2. Proposed Solution

The solution to this problem is twofold. First, BellSouth should perform a routine data clean-up of the RSAG, CSR and switch databases to ensure the databases are in alignment. Second, BellSouth should mechanize the post-migration updates and provide a billing completion notification within 24 hours of physical service order completion.[23] In this manner, ALECs will be assured that the information present on the CSR accurately reflects the reality of the customer's account.

C. BellSouth Does Not Permit ALECs to View And Resolve Pending Service Orders (Priority 3)

1. The Problem

BellSouth does not permit ALECs to process any type of order for a customer—including a migration—if there is a pending service order on a customer's account. This problem could be resolved quickly if BellSouth's OSS allowed ALECs to view and resolve pending service orders; instead—as the Commission has observed—BellSouth has in place a process that is "completely bureaucratic, inefficient, and lengthy."[24] This process harms Florida consumers by delaying ALECs the ability to migrate customers quickly and efficiently.

Under BellSouth's Byzantine procedures, once an ALEC's order is rejected or clarified stating that there is a pending service order, the ALEC must contact its customer to determine

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[23] A billing completion notification would inform the ALEC when the customer migration occurred and that the billing change was completed. Tr. at 57. Accordingly, if the ALEC did not receive a billing notification for one of its orders, the ALEC would be aware that the migration was pending. This would allow the ALEC to investigate the issue promptly. MCI proposed the billing completion notification through BellSouth's change control process. *Id.* BellSouth rejected this change. Other LECs like Verizon and SBC provide a billing notification. *Id.*

[24] Tr. at 52.

whether and what orders are pending against the account.[25] The ALEC then must contact

BellSouth to request BellSouth to verify whether the pending service order has been completed

and to update the CSR. If the order has been completed, the ALEC must ask its customer to

request the service order number from BellSouth so that the ALEC can provide BellSouth's

Local Carrier Service Center ("LCSC") the BellSouth service order number demonstrating that

the pending service order should be removed. If the service has not yet been provided, the

ALEC must request that the customer contact BellSouth to cancel the pending service order.

Through this entire process, the customer is prevented from migrating his service. This process

is required even if the problem is an internal BellSouth error that has caused the "pending order"

(even an ALEC migration request) to fail to complete through the billing system. In this case,

the ALEC must simply wait until BellSouth completes the billing change.

Once the pending service order is removed, BellSouth does not notify the ALEC to

indicate that the migration can go forward. The only way for the ALEC to know that the issue

has been resolved is to go back and pull the CSR again.[26]

It is also important to note that many Florida customers are needlessly forced to endure

this process by nothing more than BellSouth's failure to keep its records up to date. As Florida

Digital explained, for many customers affected by this problem, BellSouth completed the

pending service orders weeks before the customer's attempted migration. Accordingly, not only

was the customer's migration delayed by BellSouth's "completely bureaucratic, inefficient, and

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[25] Tr. at 21.

[26] Tr. at 51-52.

lengthy process," the problem this process was supposed to resolve existed only in the recesses of BellSouth's poorly maintained database.

2. Proposed Solution

ALECs recommend that this Commission require BellSouth to permit them the ability to view and update pending service orders and grant ALECs access to the portion of BellSouth's OSS that sends pending order information to BellSouth's retail arm. In this manner, ALECs can directly act to resolve the pending service order. As the Commission suggested, ALECs, once authorized by the customer, could act on the customer's behalf to take whatever steps are necessary to migrate the customer to the ALEC and ensure that the desired services are provided to the customer.[27]

D. BellSouth Does Not Provide Facilities Reservation Numbers for EDI At No Cost (Priority 4

1. The Problem

To send a DSL order electronically Network Telephone needs a Reservation Identification Number ("RESID") or Facility Reservation Number (FRN). Network Telephone currently obtains RESIDs through the Local Exchange Navigation System (or "LENS"), but there are times that the LENS Database is not accurate or updated and Network Telephone must go to the Complex Resale Support Group ("CRSG") to get an FRN. Network Telephone used to be able to request FRNs from CRSG and then send its orders electronically. CRSG, without notice, stated that Network Telephone no longer could do this, but had to pay for a loop makeup inquiry (at a cost of $46.00 per inquiry in Florida) in order to send the order electronically. The only other option given Network Telephone was to request an FRN and provide an LSR to be

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[27] Tr. at 59-60.

faxed from the CRSG, thus requiring Network to pay the manual processing charge. BellSouth stated the reason it did this was because it had to recoup some of its costs in doing the loop makeup. In other words, BellSouth arbitrarily decided to stop affording Network Telephone an inexpensive electronic method to obtain FRN/RESIDs and send orders. Instead, they now insist NTC order this manually, and at much greater expense.

2. Proposed Solution

BellSouth must provide ALECs FRNs at no cost and permit ALECs to submit FRNs electronically.

E. **EDI Is Not Available For Preordering (Priority 5)**

1. The Problem

BellSouth's current pre-ordering system, TAG, is based on a proprietary implementation of the CORBA software system. Its business rules and processes are governed solely by BellSouth and do not meet the requirements of the Ordering and Billing Forum (OBF), the industry association that develops the business rules that allow ALECs to compete in multiple environments with the same OSS. BellSouth should agree to implement an EDI standard pre-ordering process such as that used by Verizon and to use Interactive Agent to allow ALECs to communicate with BellSouth's OSS on a real time basis. WorldCom requested this upgrade via Change Request 0186, which was placed submitted by WorldCom in September of 2000. Also Change Request 0101 was placed in July of 2000 by a vendor, requesting an EDI solution and also ranked. To date neither of these requests has been deployed.

2. Proposed Solution

BellSouth should offer its wholesale EDI customers a pre-order solution comparable to other ILECs.

F. Significant Issues Related to LFACS Are Outstanding (Priority 6)

    1.   The Problem

Covad explained to this Commission that BellSouth's Loop Facility Assignment Control System ("LFACS") does not contain accurate and complete facilities information.[28] DSL service can only be provided over a clean loop. Accordingly, an ALEC offering DSL service must ensure that the loops it requests are free from impediments such as load coils. As Covad explained at the workshop, prior to ordering a loop from BellSouth, it queries the LFACS database to determine whether there are load coils on the loop.[29] If the data in LFACS indicates the presence of such an impediment, Covad can request conditioning of the loop to remove the impediment at the outset. The information in LFACS, however, has proven to be inaccurate. ALECs have ordered loops believing that there were no impediments, only to discover at the provisioning stage that conditioning was required. At that point, the ALEC must cancel the order, pay a cancellation fee and resubmit the order with a request for conditioning.[30] This deficiency causes unforeseen provisioning delays, prevents ALECs from providing timely DSL service, and causes ALECs to incur additional expense because of the inaccuracy in BellSouth's system.

Compounding this problem is the fact that some ALECs—like AT&T—lack access to the LFACS database altogether despite BellSouth's promises to make access available. A Memorandum of Understanding ("MOU") between BellSouth and AT&T that became effective May 15, 2001, requires that the LFACS database be made available to AT&T, but BellSouth has

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[28] Tr. at 9-10.

[29] Tr. at 9.

[30] Tr. at 10.

yet to make good on this requirement.[31] Although BellSouth indicated during the workshop that it plans to provide AT&T access to LFACS by May 18, 2002,[32] given its delay of more than a year in providing this access, the Commission should order that access be granted immediately. If BellSouth, in fact, sticks to this revised date, LFACs access would be provided a full year after it was originally promised. Additionally, in a meeting between AT&T and BellSouth on March 1, 2002, AT&T discovered that the LFACS solution delivered on May 18, 2002, will not address AT&T's issue of identifying the customer to which BellSouth has a facility assigned.

2. Proposed Solution

ALECs propose that BellSouth change its current loop modification process to permit ALECs to preauthorize loop modification. This solution would permit an ALEC to submit an LSR informing BellSouth that while the LFACS database indicates that no load coils are present on the loop, BellSouth may remove any impediment that it discovers during the provisioning process without requiring the ALEC to submit an additional service request. This solution is efficient and does not impose an undue burden on BellSouth. Indeed, Qwest and SBC already provide this process to ALECs.[33]

Finally, this Commission should also ensure that BellSouth finally honors its commitment to provide ALECs access to LFACS.

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[31] The COSMOS report offered by BellSouth as an alternative to LFACS does not deliver the information that AT&T needs to deliver timely and accurate service its customers. In addition to being difficult to use, the COSMOS report does not link busy pairs to a specific customer location, telephone number or purchase order number as LFACs does. This makes COSMOS impractical as a tool to pre-check facilities or to reconcile the databases.

[32] Tr. at 31.

[33] Tr.at 10.

III. ORDERING

BellSouth continues to deny ALECs nondiscriminatory access to ordering and provisioning functions. OSS problems identified at the workshop included the following:

- BellSouth's mechanized order processing is inadequate -- manual handling of orders is excessive;

- BellSouth fails to remove ADSL USOC codes promptly

- BellSouth provides invalid clarifications;

- BellSouth places unauthorized local freezes on consumers' lines and fails to remove them promptly;

- BellSouth provides incomplete clarifications;

- BellSouth's LCSC escalation process must be improved;

- BellSouth returns incomplete FOCs;

- BellSouth's Due Date Calculator "fix" must be verified; and

- BellSouth's ordering systems experience frequent outages.

A. BellSouth's Mechanized Ordering Processing Is Inadequate – Manual Handling Of Orders Is Excessive (Priority 1)

1.   The Problems

BellSouth's excessive reliance on manual processing to handle ALEC orders is discriminatory and adversely impacts competition. BellSouth's OSS processes the orders of its retail operations electronically and without manual intervention for *all* its products, services, and transactions. In contrast, *all* ALEC orders for IDSL loops, UCL-ND loops, and any loop that needs conditioning must be submitted manually.[34] BellSouth is the only incumbent carrier that

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[34] Tr. at 69-71; Covad presentation at slide 8.

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discriminates in this fashion, forcing ALEC orders to be handled manually when these same

orders are mechanized for its own retail operations.[35]

Excessive use of manual processing to handle ALEC orders is discriminatory and

adversely impacts consumers and competition in several important respects.

- Manual processing delays timely order status notices for ALEC LSRs that fall out for manual processing. For example, it takes BellSouth approximately 12 hours on average to provide a rejection notice and approximately 18 hours to provide a FOC for electronic LSRs that fall out for manual processing. In contrast, it takes less than 15 minutes on average to send a rejection notice or FOC when the LSR flows through and is processed electronically.

- Manual processing severely delays the issuance of a FOC, and—because due dates are assigned at the time the system generates a FOC—electronic LSRs that fall out for manual processing are also delayed.

- Electronic LSRs that fall out for manual processing face the risk of input errors. LCSC Input errors could lead to a different service being "installed" than that which the ALEC actually requested on the LSR.

- Manual processing of LSRs is more costly than processing LSRs that electronically flow through.[36]

- ALECs are less likely to launch a mass marketing campaign if BellSouth continues to rely so heavily on manual processing.[37]

These problems will only increase as ALEC volumes increase. As BellSouth admits, "[w]e

make mistakes, particularly when there is human intervention associated with processing [an]

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[35] Tr. at 71.

[36] *Id.*

[37] As Covad pointed out, "we're not going to add 600,000 people to our network faxing orders the way BellSouth - - when BellSouth can do it electronically." Tr. at 120.

order."[38] Unless ALEC orders flow through BellSouth's systems at the same rate as BellSouth's retail systems, BellSouth is discriminating in a way that harms both Florida consumers and the ALECs. Electronic LSRs that flow through are more likely to be processed quickly, accurately, and at less cost by BellSouth than manually processed LSRs. As a result, flow through provides benefits to consumers, including less time on the phone placing orders, earlier due dates, lower risk of inaccurate provisioning, and ultimately lower prices because of lower order processing costs.[39]

BellSouth's reported monthly flow-through rate for residential retail orders in October, November, and December 2001 was 94 percent or higher. Because that percentage includes service representative input errors, the actual flow-through capability of BellSouth's retail operations is nearly 100 percent. In sharp contrast, one third of all ALEC orders receive manual processing at BellSouth's LCSC regardless of whether those orders were submitted electronically or manually.[40] Indeed, Network Telephone presented evidence at the workshop that demonstrated that for a given month 79% of Network Telephone's overall manual fallout was caused by BellSouth.[41] Despite the ALECs continued focus on flow through ordering, BellSouth's problems persist. In fact, according to BellSouth's January MSS report, BellSouth missed the Residence, Business, and UNE flow through benchmarks. Further, as several ALECs noted, BellSouth's Flowthrough task force has not improved the disparity between ALECs' and

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[38] Tr. at 208.

[40] Tr. at 75.

[41] Tr. at 65.

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BellSouth's flow through.[42] This lack of effectiveness stems, in part, from BellSouth's failure to implement the Flowthrough task force's requests. To date, BellSouth has fully implemented only 5 of the Flowthrough task force's requests. An additional 10 are scheduled to be implemented by November 2002. However, there are 20 pending requests for which no implementation date is scheduled. Included in these are issues ALECs have identified as significant problems such as issues concerning multi-line hunting and related purchase order numbers ("RPONs") for LSRs.

It is time for this Commission to intervene in this area to help give Florida consumers a meaningful choice in the marketplace. BellSouth's retail operations have electronic ordering and flow through capability that is far superior to that provided to ALECs. This lack of parity gives BellSouth a distinct advantage because it results in delays for ALEC orders, it increases the probability of error, and it increases ALECs' cost of operations, while ultimately lowering the quality of service ALECs can provide to their customers.

2.   Proposed Solutions

This Commission should require BellSouth to implement swiftly the Flowthrough task force requests. This implementation should not come at the expense of other ALEC requested changes and the correction of software defects introduced by BellSouth as a result of their poor system development and testing processes. The implementation of flow through changes should be made in addition to the other changes and should not be used to deny ALEC requested changes. The Commission should further require that residential UNE-P orders with retail

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[42] Tr. at 66.

features such as call forwarding and voice mail, among others flow through. In addition, the Commission should require BellSouth to identify all of the reasons that prevent an order from flowing through BellSouth's systems[43] and to fix any defects in this process that are within its control.

B. BellSouth Fails To Remove ADSL USOC Codes Promptly (Priority 2)

1. The Problem

The problem with ordering service for a customer that has ADSL service is two-fold. First and foremost, BellSouth refuses to permit an ALEC to provide voice service to a customer over the same line BellSouth uses to provide DSL service (*e.g.* FastAccess). BellSouth currently provides DSL service to more than 600,000 customers in its territory and it plans to increase that number to 1.1 million by the end of this year. For any of those customers to migrate to an ALEC, they must first disconnect their FastAccess service. BellSouth's policy creates a substantial barrier to entry that will become greater over time.

The second aspect of the ADSL problem concerns how BellSouth implements its policy. BellSouth includes an ADSL USOC on the CSR of customers that receive DSL from a BellSouth affiliate or Network Service Provider ("NSP").[44] It should be noted here that in the vast majority of cases, BellSouth is the Network Service Provider. ALECs encounter very few instances in which the ADSL has been ordered by another wholesale NSP. It is the ALECs' understanding that BellSouth is even including ADSL USOCs on customers that do not even have DSL service, but rather have simply been pre-qualified for such service. BellSouth is rejecting ALEC orders

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[43] This explanation should not be limited to the definition of "designed manual" that BellSouth provided to the Georgia Commission.

[44] BellSouth has indicated that the ADSL USOC is included on the CSR for provisioning purposes to indicate that the DSL service is billed to the NSP, who then bills the end user customer.

for customers with an ADSL USOC on their CSR and requiring that the code be removed from the customer's CSR before BellSouth will process the order. To accomplish this, an ALEC must notify its customer that the customer cannot retain its existing DSL service if it wants to convert to the ALEC's service. The ALEC must also ask the customer to notify its NSP that the customer no longer wants the DSL service. In turn, the NSP must then contact BellSouth to have the ADSL USOC removed from the customer's CSR.[45] The process BellSouth has established to remove the ADSL USOC from the customer's CSR is unmanageable and unrealistic. Requiring customers to become involved in removing the ADSL USOC code from BellSouth's CSR is a significant disincentive to signing up for an ALEC's service. Indeed, customers have decided not to migrate to ALECs because BellSouth delayed too long and made it too difficult to switch carriers.[46] As an ALEC explained at the workshop, one of its customers has been waiting for over three months for BellSouth to remove the ADSL USOC code so that he can migrate his service.[47]

Additionally, as noted above, BellSouth's CSRs often contain inaccurate information. Several customers contacted by ALECs after rejection of an order have told the ALEC that they had discontinued DSL service for some time prior to the migration, and did not understand why the USOC code was still on their CSR. BellSouth has acknowledged that it has failed to promptly remove the ADSL USOC code from the CSRs of customers that no longer used BellSouth DSL service. It has also acknowledged that the "process" given to ALECs for

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[45] Delays occur regardless of whether the customer wants ADSL removed completely from the CSR, the customer does not have ADSL service to begin with, or the customer wants ADSL moved from one line to another.

[46] Tr. at 88.

[47] Tr. at 86.

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requesting these changes does not work and may not even have been communicated to the internal BellSouth groups who perform this function. Since BellSouth has failed to take appropriate action, ALECs are left without a process for dealing with orders rejected by BellSouth for ADSL USOC code reasons. In fact, there is no relief on the immediate horizon.

2. Proposed Solutions

BellSouth should be required to permit ALECs to provide voice service to BellSouth customers using the same line used to provide BellSouth's FastAccess service. If this solution is implemented, the operational problems with BellSouth's implementation of its policy will become moot. If the Commission does not require BellSouth to change its policy, then at least the Commission should require BellSouth to (1) identify the DSL provider on the CSR;[48] (2) permit ALECs to act as the customer's agent so that the ALEC can modify the account; and (3) remove the ADSL the same business day, if at all possible, but in all cases within 24 hours of receipt of the removal request.

C. BellSouth Provides Invalid Clarifications (Priority 3)

1. The Problem

An invalid clarification occurs when BellSouth rejects a local service request even though it was completed properly by the ALEC according to the business rules. In January 2002, 30% of Network Telephone's overall clarifications fell into this category.[49] These invalid clarifications result in unnecessary processing expense for ALECs and delay for ALEC customers. Indeed, Network Telephone explained that its back office must spend hours – and

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[48] Until BellSouth provides ALECs the ability to view the DSL provider on the CSR, BellSouth should be required to provide ALECs same-day identification of the DSL provider.

[49] Tr. at 67.

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sometimes days -- dealing with Fleming Island and the Birmingham LCSC to resolve these issues.[50] Network Telephone has more than once furnished several examples of invalid clarifications to BellSouth, but the problem persists.

AT&T has also been impacted by invalid clarifications. During October and November 2001, AT&T had 203 UNE-P orders, roughly 619 lines, impacted because of a USOC conversion. This caused these UNE-P orders to fall out and delayed AT&T's ability to migrate the customers.[51]

Invalid clarifications also can occur because of poorly trained BellSouth representatives in the LCSC. Nevertheless, BellSouth representatives have rejected orders on this basis. Manual handling must be reduced and when it is required, BellSouth representatives must be trained adequately so that correct ALEC orders are not rejected. Improper clarifications are an unnecessary, time consuming, and expensive burden on ALECs.

2.   Proposed Solutions

ALECs recommend that this Commission address the problem of invalid clarifications by (1) requiring BellSouth to improve its error code descriptions to be sufficiently specific to allow for error identification and correction by the ALEC; (2) requiring BellSouth to improve its employee training; and (3) when the LSR is handled manually, requiring BellSouth representatives to review the entire LSR before returning any and all clarifications at once.

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[50] Tr. at 66-67.

[51] Tr. at 78.

D. BellSouth Places Local Freezes On Consumers' Lines And Fails To Remove Them Promptly (Priority 4)

1. The Problem

Local freezes function similarly to PC freezes to prevent a customer's local service from being migrated to another carrier.[52] ALECs are discovering that their orders to migrate customers are being clarified or rejected because there is a local freeze listed on the customer's account. BellSouth has placed some of these freezes without the knowledge of the customer.[53] In other cases, the freeze is legitimate, but BellSouth fails to remove the freeze promptly upon the customer's request.[54] In either case, the freeze prevents the customer from migrating his service.

Customers wishing to migrate have called and written BellSouth to lift local freezes, but to no avail. After the customers request the freeze be lifted, resubmitted ALEC LSRs are repeatedly rejected or clarified because of account freezes. In some cases, customers report that BellSouth informed them that the freeze was lifted or BellSouth even provided an order confirmation number, but the resubmitted ALEC LSR is still rejected due to an account freeze. There have been cases where this cycle of rejected LSRs has gone on for months despite the customer's repeated calls to BellSouth and BellSouth's repeated representations that the freeze has been lifted. Notwithstanding any explanation from BellSouth of the specific root causes of the problem, the end results are the same: BellSouth has not lifted local freezes as requested by the customer and required by FCC rules, and the ALECs' LSRs are needlessly

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[52] Tr. at 88.

[53] Tr. at 89.

[54] Tr. at 81.

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delayed by that failure. The irony of the situation should not escape the Commission: an account freeze the customer may have wanted as additional protection against slamming can result in a "reverse slam" by BellSouth's failure properly to lift the freeze and allow the customer to migrate when he or she chooses. BellSouth's anti-competitive behavior causes significant delay in providing the customer the ALEC service he desires, costs the ALEC time, and increases ALEC expense.

2. Proposed Solution

To remedy this problem, ALECs suggest that this Commission require BellSouth to lift the local freeze within 1 business day and issue both a provisioning and completion notice within 24 hours.

E. BellSouth Provides Incomplete Clarifications (Priority 5)

1. The Problem

When ALEC orders must be processed manually, BellSouth often provides incomplete manual clarifications, which means that the clarification BellSouth returns to an ALEC does not address all errors found on the LSR. Accordingly, subsequent LSRs submitted by the ALEC can be rejected based on reasons that existed in the original LSR. This serial approach to clarifications leads to delayed implementation for ALEC customers and increases ALECs' operating expenses.

2. Proposed Solution

To resolve this problem, the Commission should require BellSouth to implement a process to ensure that the entire LSR is validated during the first order review. In this manner, all clarifications can be returned to the ALEC at the same time. The process will allow

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customers to get their service sooner as well as save both BellSouth and ALECs significant time and energy that would otherwise be devoted to correcting LSRs on an error-by-error basis.

F.   BellSouth's LCSC Escalation Process Must Be Improved (Priority 6)

1.   The Problem

When ALECs have a question about a pending order, provisioning problem, or other issue, they must contact BellSouth's LCSC. What ALECs encounter is a labyrinthine system in which the ALEC is passed from person to person, up BellSouth's escalation chain. As the Commission noted, the very first person with whom an ALEC speaks, the BellSouth service representative, does not have any authority to address ALECs' concerns immediately.[55] Accordingly, ALECs almost always have to escalate problems to effect some kind of resolution. This increases ALECs' cost since the ALEC must send in additional orders,[56] and delays resolution of the problem. Indeed, it can take hours to solve a relatively simple problem.

2.   Proposed Solutions

BellSouth should follow this Commission's directive to empower its line employees to resolve problems. Additionally, BellSouth should provide the Commission and ALECs with its current internal methods and procedures including targets for responding to escalations, and BellSouth's action plans to decrease escalation response times.

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[55] Tr. at 173-74.

[56] Tr. at 174.

G. BellSouth Returns Incomplete FOCs (Priority 7)

1. The Problem

BellSouth frequently returns firm order confirmations ("FOCs") without the requisite service order identifier.[57] While this permits the order to proceed initially, the lack of an order ID prevents ALEC/BellSouth coordination in the provisioning stage. When an ALEC is competing via UNE-Loop, for example, a great deal of coordination is involved in order to prevent unnecessary end user outages. Since the BellSouth service centers rely almost exclusively on the service order ID for tracking and processing orders, they will not communicate with ALECs that do not have the corresponding order ID. Coordination is therefore impossible, and delays and customer outages are inevitable.

2. Proposed Solutions

Since a timely but incomplete FOC is useless, the Commission must ensure that BellSouth is not sacrificing completeness for the sake of timeliness. While ALECs have attempted temporary workarounds,[58] BellSouth personnel have failed to take ownership of the issue and it continues to unnecessarily hinder local competition. BellSouth should be required to identify the root cause of this problem, and submit a remediation plan to the Commission for approval. The performance metrics also must exclude all FOCs sent without a service order ID from the count of FOCs sent on time, in order to create an incentive for BellSouth to ensure that its FOCs are complete when sent.

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[57] Tr. at 179.

[58] *Id.*

H. BellSouth's Due Date Calculator "Fix" Must Be Validated (Priority 8)

1. The Problems

BellSouth must demonstrate to this Commission and ALECs that it has remedied the consistently recurring problems ALECs have with obtaining accurate due dates. Equivalent access to due dates is critical to competition because ALEC customers, like BellSouth customers, expect the ALEC to be able to tell them the date on which service will be installed while they are on the line. Recognizing the importance of the due date functionality, the FCC stated in its *Second Louisiana Order* that it would "closely examine BellSouth's automatic due date calculation capability in any future application."[59] While BellSouth asserts that it has recently implemented software enhancements that would remedy problems with its due date calculator, ALECs and this Commission have reason to be skeptical of this yet unproven "fix." Indeed, two previous attempts undertaken by BellSouth to fix problems with its due date calculator were unsuccessful.

Moreover, BellSouth's fix only addresses the problem of incorrect due dates on the Supp 3 transaction. The due date problem exists on each supplemental order an ALEC submits. For example, an ALEC may submit an order to migrate a customer with a due date of 5/1/02. The initial order will be confirmed with this due date via the FOC. Prior to the completion of the order, the ALEC may issue a supplemental order (supp 2) to move the due date to 5/10/02. BellSouth's systems return the initial due date (5/1) on the FOC rather than the new due date,

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[59] Memorandum Opinion and Order, *In the Matter of Application by BellSouth Corporation, et al., Pursuant to Section 271 of the Communications Act of 1934 as Amended to Provide In-Region, InterLATA Services in Louisiana*, 13 FCC Rcd. 20,599 ¶¶ 104-06 (F.C.C. Oct. 13, 1998) (No. CC 98-121, FCC 98-271) (*"Second Louisiana Order"*).

even though the order will be completed on 5/10. BellSouth has not explained why this problem is occurring or why they can only fix this problem for the *third* supplemental order that ALECs issue for this same account. No due date has been established for this fix.

2.   Proposed Solutions

This Commission should require KCI to evaluate BellSouth's latest "fix" using substantial commercial usage data. Additionally, the Commission should require BellSouth to expand its due date calculator "fix" to include Supp 2s and to provide a root cause analysis of this problem. Until BellSouth can demonstrate it has comprehensively corrected its due date calculator, it cannot be relied upon.

I.   **BellSouth's Ordering Systems Experience Frequent Outages (Priority 9)**

1.   The Problem

ALECs are dependant upon BellSouth's EDI, LENS, and TAG systems to place their orders. When these systems are slow, or when the systems experience outages, ALECs' ability to order products and services from BellSouth is severely limited. BellSouth systems experience an unacceptable number of service outages. In January 2002, for example, EDI experienced 2 outages, which lasted between 40 minutes to 8 hours and 10 minutes.[60] That same month, LENS experienced 9 outages ranging from 20 minutes to 6 hours and 25 minutes, and TAG experienced 4 outages ranging from 5 minutes to 1 hour and 20 minutes. February 2002 data indicates BellSouth's outage problems continue and, for TAG, the problems are worse.[61] Importantly, these outage reports do not include the first 20 minutes of an outage. Moreover, outages of less than 20 minutes are never reported.

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[60] *See* System Outage Report available at www.interconnection.bellsouth.com/markets/lec/ccp

2. Proposed Solutions

To solve this problem, BellSouth should provide additional computer resources to ensure that these important ordering systems are available to ALECs. Additionally, BellSouth should begin reporting all outages, including those with less than 20 minutes, to allow ALECs and the Commission to monitor this area of performance. Finally, BellSouth should be required to discontinue its discriminatory OSS offerings by having down time for LENS and TAG be no more than that for EDI.

IV. BELLSOUTH'S PROVISIONING PROBLEMS HARM FLORIDA CONSUMERS AND ALECS

The area of provisioning affects customers most directly,[62] and delays in provisioning ALEC orders causes intense customer dissatisfaction.[63] The February workshop identified a number of important customer-impacting provisioning problems. As ALECs explained,

- BellSouth's provisioning accuracy is poor;

- BellSouth prematurely disconnects ALEC customers migrating to UNE-P and UNE-Loop;

- BellSouth issues an excessive number of pending facility holds on ALEC orders and does not promptly resolve those holds;

- BellSouth's jeopardy notice procedures are inadequate;

- BellSouth improperly rejects disconnect orders;

- BellSouth fails to provide timely provisioning of UCL-ND;

(Footnote cont'd from previous page.)

[61] The February Service Outage Report indicates TAG experienced 10 outages.

[62] Tr. at 161.

[63] Indeed, the only way ALECs become aware of provisioning problems is through customer complaints or via random audits. Tr. at 163.

- BellSouth fails to satisfy its obligations for line sharing; and

- BellSouth fails to follow procedures in provisioning ALEC line sharing orders.

ALECs are powerless to correct any of these provisioning issues independently. Only BellSouth and this Commission can ensure that these processes function properly.

A. BellSouth's Provisioning Accuracy is Poor (Priority 1)

1. The Problems

BellSouth impedes ALECs' ability to compete in Florida by failing to provision ALECs' customers accurately. This problem is so acute that for some loops ALEC customers experience provisioning troubles at a rate *seven times higher* than the rate for BellSouth's own customers.[64] Other problems include:

- MCI customers who received the wrong interLATA carrier, received the wrong features, or did not receive important features[65];

- ALEC customers who incurred substantial telephone costs they did not expect;

- ALEC customers experiencing provisioning problems for ISDN lines within the first 30 days of provisioning at a rate twice as high as the rate for BellSouth customers.

Remedying BellSouth's inaccurate provisioning wastes valuable ALEC resources. These are problems that take significant time to resolve. Indeed, MCI told the Commission that "these are the most disconcerting customer problems of all, and they are problems that require us to

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[64] ALEC line sharing customers were impacted most significantly. 66.67% of ALECs' line sharing customers experienced provisioning troubles within the first 30 days of provisioning. In contrast, only 9.4% of BellSouth's customers were similarly impacted.

[65] Tr. at 162.

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make multiple calls to BellSouth."[66] As the Commission noted, BellSouth's errors also cause

ALECs added expense. When BellSouth provides ALECs an incorrect service order

confirmation, the ALEC only learns of the incorrect provisioning when the customer calls to

complain,[67] a step that often occurs only after the customer has been billed for a service that her

or she is not receiving. Further complicating matters is the fact that ALECs do not automatically

receive a refund from BellSouth for the period of time in which the service was not operational.[68]

BellSouth's provisioning accuracy problems extend to ALEC business customers. When

converting ALEC customers to UNE-P, BellSouth sometimes implements the wrong translations

causing these business customers to experience service disruptions, incorrect service

provisioning, and incorrect bills.[69] ITC customers, for example, have lost service and voice mail

features, have had their hunting service disrupted and have had their inside wire and jacks not

applied according to the order. To assure that its customer's are receiving the services as

ordered, ITC reviews all completed CSRs and sends to BellSouth a list of discrepancies each

week for correction. ALEC customers should not be subjected to such deterioration in service.

This is a known deficiency in BellSouth's OSS. On October 10, 2001, KCI opened

Exception 112 because BellSouth's systems or representatives have not consistently provisioned

services and features as specified in orders submitted by KCI.

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[66] Tr. at 163.

[67] Tr. at 163.

[68] Tr. at 164.

[69] Tr. at 186.

2.   Proposed Solutions

BellSouth must conduct a root cause analysis and fix this issue quickly and effectively. With additional flow through capabilities, implementation of Single C, improved service order accuracy measures, and sampling/verifications of completed customer service records by BellSouth, quality of service should improve significantly.

B.   BellSouth Prematurely Disconnects ALEC Customers Migrating To UNE-P and UNE-Loop (Priority 2)

1.   The Problem

When a customer converts from BellSouth's service to UNE-P, the conversion *should* have no impact on the end-user's service.[70] The evidence presented at the workshop demonstrates, however, that BellSouth's current migration process is not working properly and results in an unduly high number of incidents of loss of service.[71] BellSouth's role in causing the loss of service is hidden from the consumer, leaving the ALEC to incur the customer's wrath and suffer damage to its business reputation.

The premature disconnect problems arise because BellSouth uses two separate internal orders to convert customers to UNE-P: a new or "N" order accomplishes the conversion to UNE-P; a disconnect or "D" order disconnects the customer's service from BellSouth. If BellSouth does not process these two orders in the proper sequence, the customer's service is disconnected *before* the conversion to the new service is complete.[72]

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[70] Tr. at 186.

[71] Tr. at 182-84

[72] Tr. at 183.

Unfortunately, this problem is not limited to UNE-P orders, as BellSouth consistently fails to coordinate the D (disconnect) and N (new/reconnect) portions of ALEC UNE-Loop orders as well.[73] When this occurs, end users suffer from a variety of out of service conditions, depending on which order is worked and in what sequence. When the D order is worked, for example, but the corresponding N order is not, the end user will be completely out of service;[74] when the situation is reversed, end users will generally lose all incoming service since inbound calls will be ported to a circuit other than the one still connected to the customer.

BellSouth is proposing a new single C order that allegedly will remedy this problem. Currently, the target implementation date for the single C order is April 2002.[75] ALECs have no assurance that this process will correct the problem. As AT&T witness Berger explained, several months ago BellSouth had implemented an "interim fix" for this premature disconnect problem.[76] This temporary solution, however, did not correct the problem and ALEC customers continue to lose service when migrating to UNE-P.[77] Indeed, when this Commission asked if BellSouth's single C process would correct the flaws of BellSouth's interim measure, BellSouth could not give this Commission or ALECs that assurance.[78]

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[73] Tr. at 182-183.

[74] Tr. at 183.

[75] Tr. at 183-84.

[76] Tr. at 184.

[77] Tr. at 184.

[78] Tr. at 204-05

2.   Proposed Solution

Implementing a single C order is the first step toward correcting this important customer-impacting problem. Whether the single C order will correct this customer-impacting deficiency is uncertain. This Commission should monitor its implementation to determine whether a single C order allows seamless, transparent UNE-P conversions. If for some reason the single C order does not correct this problem, this Commission should require BellSouth to conduct a root cause analysis to identify and resolve this issue. Since the single C practice will apparently not apply to UNE-Loop conversions, the Commission must initiate a process whereby it, BellSouth and the ALECs work out an analogous practice to ensure that disconnect and reconnect orders are tied firmly to one another and get worked in the proper sequence. Absent a procedure that eliminates loss of service during the customer migration, ALECs and Florida consumers will continue to experience an unduly high incidence of lost service when migrating customers to UNE-P or to UNE-Loops.

C.   BellSouth Issues An Excessive Number Of Pending Facilities Holds And Does Not Promptly Resolve Those Holds (Priority 3)

1.   The Problems

The pending facility problem ALECs described to this Commission is twofold,[79] and is the highest priority issue for facilities-based ALECs. First, BellSouth places an excessive number of ALEC orders on hold, pending facilities ("PF hold"), based either on an actual or perceived lack of facilities. In some instances, BellSouth's belief that it lacks facilities is colored by inaccurate record keeping – its records simply fail to enable a reliable assessment of whether

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[79] Tr. at 181-82.

it has facilities available for a certain order. The larger problem, however, is that BellSouth is treating ALECs in a discriminatory manner when it comes to assignment of available facilities.[80]

BellSouth's own data reveals the severity of the discrimination problem, and clearly reveals that BellSouth places a far greater percentage of ALEC orders in PF hold, for many service categories. The January 2002 data demonstrates, for example, that 8.4% of ALEC orders for 2 wire analog loop-designed were placed in jeopardy compared to just 0.6% of BellSouth orders for the same product. Likewise, 9.6% of ALEC orders for 2 wire analog loops with LNP were placed in jeopardy, while again only 0.6% of BellSouth's orders received a jeopardy notice. For digital loops greater than DS1, BellSouth placed *over half* (56%) of ALEC orders in jeopardy as compared to just 5% of its own orders. Placing ten times as many ALEC orders in PF jeopardy status is clear evidence of discrimination.

The second problem ALECs encounter is that once BellSouth places its order in a PF hold, BellSouth unduly delays solving the problem. Accordingly, the ALEC, and its customer must wait for BellSouth to decide to provision these pending orders. BellSouth has admitted in the Georgia performance measures docket that it has delayed resolving certain ALEC orders that were in pending facilities status.[81] BellSouth has indicated that it is in the process of developing additional procedures to ensure prompt resolution of pending facilities situations by field personnel. Whether these procedures will correct this problem, however, remains far from clear.

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[80] Tr. at 182.

[81] BellSouth Telecommunications, Inc.'s Third Notice of Filing Corrective Action Plan, *In re: Performance Measurements for Telecommunications Interconnection Unbundling and Resale*, filed Feb. 1, 2002 in Docket No. 7892-U at 14-15.

2. Proposed Solutions

To address these pending facilities deficiencies, the Commission must require that BellSouth provide access to facilities on a nondiscriminatory basis. BellSouth must develop a remedial action plan to provide equal access to facilities as the Act requires,[82] and submit performance data that proves it is providing such access. The Commission must also require that BellSouth consult accurate facility records prior to advising ALECs whether it has facilities available. This must be done prior to issuance of the firm order confirmation. If the current FOC interval is not sufficient as it relates to loop orders (specifically DS-1 and above), consideration should be given to the establishment of a separate interval for those orders.[83] A timely but unreliable FOC is of no utility, and actually harms competition by setting false expectations. Finally, the loop provisioning process must contain a procedure to actually verify the existence of a working loop prior to the time scheduled for the install or cut-over.[84]

In order to speed resolution of PF holds, this Commission should require BellSouth to implement its Georgia corrective action plan in Florida and should require BellSouth to develop a comprehensive and systematic procedure to update its field records.

D. BellSouth's Jeopardy Notice Procedures Are Inadequate (Priority 4)

1. The Problems

BellSouth's procedure for managing jeopardy notices is inadequate in several important respects. BellSouth issues jeopardy notices late – sometimes on the day the conversion is

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[82] 47 U.S.C. §§ 251(c)(3) and 271(c)(2)(B)(ii) and (iv); *See also* 47 U.S.C. §§251(d)(2) and (d)(3).

[83] Tr. at 182.

[84] Tr. at 187-188.

scheduled to occur.[85] This last minute jeopardy notice disrupts both the customer's and ALEC's plans. If BellSouth will not be able to meet a due date, ALECs need to know that fact in advance of the due date so that they can advise their customer that the service might not be installed as originally scheduled and make alternative arrangements.

Additionally, the manner in which BellSouth informs ALECs of these last minute jeopardies compounds the problem. AT&T, for example, provides appropriate contact information including a representative's name, telephone number, and facsimile number on the orders it submits to BellSouth. When BellSouth returns jeopardy notices, it does so by facsimile, regardless of whether the order is placed electronically or manually. While this factor alone unnecessarily introduces delay into BellSouth's notification process, the problem is exacerbated by BellSouth attempting to send the notice to an out-of-service-fax number or to AT&T's representative's voice number.

2. Proposed Solutions

ALECs propose that these provisioning problems be corrected by requiring BellSouth to return electronic jeopardy notices for electronically submitted LSRs. The loop provisioning process must also verify the existence of a working loop prior to the time scheduled for the install or cut-over.[86] Finally, BellSouth should be required to report in PMAP all jeopardy notices issued on due date so that ALECs and the Commission can monitor this problem.

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[85] Tr. at 187.

[86] Tr. at 187-188.

E. BellSouth Improperly Rejects Disconnect Orders (Priority 5)

1. The Problem

Another provisioning problem that ALECs experience concerns BellSouth's rejection of disconnect orders.[87] As the ALEC community explained, the essence of this issue is that an ALEC submits its request for a particular circuit ID to be disconnected and BellSouth rejects that request stating the circuit identified is invalid. Prior to issuing the disconnect order, however, the ALEC validated the circuit through BellSouth's back office system COSMOS.[88] Accordingly, the ALEC has already validated the circuit ID to be disconnected.

In order to overcome these improper rejections, ALECs must use time consuming work-arounds that involve multiple telephone calls with BellSouth's LCSC. This causes ALECs to experience significant delay and added expense, and delays the availability of these facilities for subsequent orders.

2. Proposed Solution

Since BellSouth representatives acknowledge that these orders are being rejected in error,[89] the solution is simple: determine why the system is rejecting valid orders, and implement a system fix. Perhaps there is a conflict between BellSouth's order system and its COSMOS system. BellSouth must perform a root cause analysis, identify the problem, and submit a fix for the Commission's and ALECs' approval.

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[87] Tr. at 180.

[88] Tr. at 180.

[89] Tr. at 181.

F.   BellSouth Fails to Provide Timely Provisioning of UCL-ND (Priority 6)

1.   The Problem

ALECs continue to experience problems getting BellSouth personnel to follow the

BellSouth procedure for provisioning UCL-ND loops. BellSouth's process for provisioning the

UCL-ND loop provides that, if the loop requires a dispatch, the BellSouth technician will

provision the loop, call the ALEC to close the order and provide demarcation point information

so that the ALEC technician can identify the loop. BellSouth is not following this process.

2.   Proposed Solution

The Commission should require BellSouth to:

- Identify who is responsible for ensuring that BellSouth follows established procedures for provisioning UCL-ND loops;

- Assign ownership for process failures;

- Create a quality management group to whom these types of issue may be escalated immediately; and

- Come to immediate resolution of these problems.

G.   BellSouth Fails to Satisfy Its Obligations for Line Sharing (Priority 7)

1.   The Problem

The workshop made clear that BellSouth is not satisfying its contractual obligations to

provide line sharing. Under the terms of the contract, BellSouth is required to provision Covad's

line sharing orders within three days.[90] BellSouth's Products and Services Interval Guide also

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[90] Tr. at 169.

offers three business days as its standard provisioning interval for line sharing.[91] Yet, BellSouth

fails to meet its offered interval or its contractual obligation for this important service.

2. Proposed Solution

The solution to this problem is a simple one -- BellSouth must honor its contractual

obligation to provision loops within its standard interval and the interval imposed by contract.

H. BellSouth Fails To Follow Procedures In Provisioning ALEC Line Sharing Orders (Priority 8)

1. The Problems

BellSouth's failure to follow its own process to provide ALECs with line sharing has

severely impacted ALEC-customer relations. As Covad has explained, BellSouth central office

technicians are required to test line sharing orders for load coils before closing the order. If the

technician discovers a load coil on the loop, BellSouth is supposed to place the order in jeopardy

and await further instructions from the ALEC regarding whether the load coil should be

removed.[92]

BellSouth does not consistently follow this procedure. This failure introduces needless

delay in the provisioning process because ALECs must open a trouble ticket to determine why

the loop it ordered does not work. Meanwhile, the customer expects his service to be working.

Until BellSouth removes the impediment on the loop, ALECs cannot provide the service. These

delays seriously impact the ALEC's credibility with the customer, and lead the customer to

believe the ALEC is inefficient.

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[91] BellSouth Products and Services Interval Guide, Issue 5A at 44.

[92] *Id.*

This is not the only line sharing related provisioning problem ALECs experience. As Covad detailed, in November 2001, 36% of its line sharing orders had troubles within the first 30 days.[93] Of those, 30% experienced repeat troubles.[94] Further, BellSouth missed 18% of scheduled repair appointments. This pattern of poor provisioning and repair is visited upon the ALEC in terms of customer dissatisfaction.

>   2.   Proposed Solution

BellSouth should follow its procedure and test for load coils before closing a line sharing order.

V.   BELLSOUTH'S BILLING POLICIES MUST BE IMPROVED

ALECs must receive wholesale bills that they can audit and validate and must receive accurate usage records that enable them to bill their own end user customers. WorldCom's MCI business unit has experienced a number of billing problems in connections with its roll out of local residential service in Georgia and Florida, including the following:

- Orders are delayed pending billing completion;

- Formatting and other errors in wholesale bills;

- Billing usage data to the wrong billing account number ("BAN"); and

- Lack of an "outcollection process" for the return of incomplete records.

>   A.   **Orders Are Delayed Pending Billing Completion (Priority 1)**

>   1.   The Problem

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[93] Tr. at 169.

[94] *Id.*

When an order is "pending billing completion," an ALEC cannot make modifications to the order or report trouble for the customer. The current internal process for correcting these errors is manual and requires up to 30 days.

    2.   Proposed Solution

BellSouth should provide a weekly report of orders held in billing and a metric should be developed for curing this problem. BellSouth should synch up its databases to ensure that these billing errors do not occur. Further, BellSouth should provide a billing completion notice, which would inform ALECs of when their orders had cleared BellSouth's billing systems.

B.   BellSouth has Formatting and Other Errors in Its Wholesale Bills (Priority 2)

    1.   The Problem

MCI has had significant problems with auditing its wholesale bills due to formatting and other errors. Without correctly formatted bills, MCI cannot audit the information that BellSouth provides to determine whether charges are being correctly assessed. MCI cannot simply "assume" that charges are correct but – like any business – must be able to ensure that the bill matches the circuits and features provided to our end user customers.

MCI's audit of the January UNE-P bills it received in Georgia showed that 3% of the lines for which MCI was billed did not include a billing telephone number ("BTN"). (The bills included only the area codes instead of the complete BTNs for these numbers.) The BTN is the only information on the bill that identifies the customer to whom the charge or credit is supposed to relate. Without a BTN, therefore, MCI cannot even determine whether the charge or credit relates to a bill for a legitimate MCI customer, much less compare the charge or credit against the amount MCI expects to receive for a particular customer.

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This is a longstanding problem. MCI called BellSouth many months ago to protest the missing BTNs on the bill. BellSouth did not look into the issue. Instead, BellSouth informed MCI that if MCI did not pay its bills as a result of this issue, BellSouth would cut off MCI's service. MCI therefore paid the bulk of the bills. MCI has continued to raise the issue, yet BellSouth still has not fixed the problem. Instead, BellSouth initially asserted that it had no obligation to provide the BTNs that are missing. Now BellSouth seems to acknowledge that it should be sending the BTNs, but in recent weeks BellSouth has begun asserting that it is sending the BTNs. BellSouth has indicated to MCI that there is a way to extract the BTNs from the data it sends because the BTNs are in a left-hand Feature Identifier ("FID"). MCI hopes that BellSouth is correct and that BellSouth will soon explain how MCI can obtain the data. If MCI cannot do so, it will continue to have a substantial problem with auditing its bills. MCI's ability to audit its bills is particularly important because it appears likely those bills are inaccurate.

2.   Proposed Solution

BellSouth should be required to fix its billing process so that BTNs are not excluded from its wholesale bills.

C.   **BellSouth Bills Usage Data to the Wrong BAN (Priority 3)**

1.   The Problem

BellSouth continues to bill usage against the wrong BAN. MCI has two UNE-P BANs in Georgia, one for customers around Atlanta, one for the rest of the state. As of January 2002, 23% of the ANIs in Georgia were billing under the wrong BAN. This makes it more difficult to maintain records and track.

2.   Proposed Solution

BellSouth should be required to fix its billing process so that usage data is billed to the correct BAN.

D. BellSouth Fails to Provide an Outcollection Process (Priority 4)

1. The Problem

One key request MCI made to the BellSouth account team was that BellSouth establish an "outcollect process." With such a process, MCI would return incorrect records to BellSouth which would then have all of the records and could more easily research the underlying problems. For example, MCI would like to be able to return to BellSouth the thousand of records BellSouth has transmitted for improperly routed intraLATA calls. This would be an easy way for BellSouth to provide credits for the DUF charges on such records. It would also enable BellSouth to more effectively investigate MCI's claim. BellSouth responded that it would take more than $30,000 to provide MCI an estimate of how much it would cost to provide an outcollect process even though BellSouth invented the process in the interLATA context for 800 number portability. Other BOCs such as Verizon and SWBT have established an outcollect process for free since this process benefits both entities.

2. Proposed Solution

BellSouth should develop an outcollection process at no charge to ALECs.

VI. BELLSOUTH'S MAINTENANCE AND REPAIR PRACTICES MUST BE IMPROVED

The workshop revealed that BellSouth's maintenance and repair practices are inadequate. ALECs are experiencing a high incidence of loss of dial tone, chronic repair troubles, premature closing of trouble tickets, failure to perform repairs during customer business hours, and a high rate of new installation failures. ALECs also explained that BellSouth does not call ALECs once a repair is complete. Finally, the timeliness of BellSouth's maintenance is also an issue. Indeed, Network Telephone demonstrated that, according to its own data, BellSouth takes over three

times longer to resolve UNE-P outages than to resolve UNE L outages for which BellSouth is responsible. These problems all degrade ALECs' ability to provide quality, reliable service to Florida customers. Continued problems in this domain threaten ALECs' ability to compete effectively in Florida.

A. Loss of Dial Tone (Priority 1)

1. The Problem

The consensus within the ALEC community is that the most significant maintenance and repair issue facing ALECs in Florida is the loss of dial tone.[95] When customers lose dial tone and cannot get their service restored promptly, they become angry and frustrated with the ALEC provider. ALECs, however, are not the source of the problem. Indeed, the workshop made clear that the majority of the loss of dial tone problems are caused by BellSouth repair issues.[96]

Network Telephone, for example, explained that in December 2001, it experienced 245 total outages. Over half of these outages were caused by BellSouth.[97] Florida Digital also explained that BellSouth technicians cause dial tone loss. The problem arises because BellSouth's technicians pull the jumpers for Florida Digital's customers in the field.[98] Once the jumper is pulled, the customer's service goes down. The ALECs in most cases are able to perform line diagnostics that aid in pinpointing where the problem lies. In these situations it is determined to be a BellSouth issue. The trouble is called in to BellSouth and usually resolved. However, the tickets are typically closed to no trouble found or customer premises equipment

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[95] Tr. 268.

[96] Tr. at 269-70.

[97] Tr. at 270.

[98] Tr. at 269.

issues. Both of these closure codes exclude the problem from the "trouble within 30 days" metric.

At the workshop, AT&T provided a list of 19 PONs, representing customers who had experienced service difficulty as a result of the UNE-P conversion from BellSouth. These customers either lost dial tone or lost features due to one of four reasons: 1) BellSouth processed the "D" order without processing an associated "N" order; 2) mistakes were made by the BellSouth LCSC agent when the orders were being retyped in the BellSouth systems; 3) BellSouth technicians did not implement the service as was indicated on the order; or 4) BellSouth changed the facilities on which the customer's service was riding. BellSouth dismissed these examples of provisioning problems, stating that AT&T's data was flawed. On March 1, 2002, AT&T met with BellSouth to review these PONs as instructed by the FL PSC. At that meeting, BellSouth admitted AT&T's data was in fact correct and that BellSouth had caused the majority of the customer problems. Of the 19 PONs, the problems on 15 were indeed caused by the BellSouth LCSC. On an additional three PONs, BellSouth indicated that they found no problems caused by the LCSC. However, AT&T's original spreadsheet indicated these were technician errors or change of facilities. AT&T has requested that BellSouth look into these problems again. BellSouth could not find the final PON.

2.   Proposed Solution

To resolve this important issue, BellSouth must adequately map and tag its facilities so that ALEC jumpers are not pulled in error. Until BellSouth improves its performance in this area, ALECs should not be required to pay tagging charges on new orders. Additionally, BellSouth technicians must test the numbers before removing jumpers. If BellSouth finds that

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there is a customer on a tested line, BellSouth should be required to contact the ALEC to resolve the issue before any additional work is performed on the order.

B. ALECs Experience Chronic Repair Troubles (Priority 2)

1. The Problem

Another important area that affects ALECs is that BellSouth does not properly repair a trouble the first time a trouble ticket is issued.[99] This leads to a high number of chronic repair problems. ALECs experience an extraordinarily high rate of repeat troubles on IDSL loops. [100] Investigation into the trouble tickets that result in repeat repairs has revealed that many are closed prematurely as "No Trouble Found." Once a trouble ticket is labeled "No Trouble Found," no additional work is done by BellSouth to isolate and resolve troubles. As a result, ALECs must open additional trouble tickets to get a problem resolved that should have been resolved when the first trouble ticket was opened. The only way to give BellSouth the proper incentive to isolate and resolve trouble tickets on the first ticket is by imposing penalties when multiple tickets have to be opened.

BellSouth's own data reveals the magnitude of the problem. In November, 2001, for example, one out of every five two-wire analog loop design troubles that required a dispatch was a repeat trouble from the preceding 30 days.[101] BellSouth's across-the-board performance for various loop types is, in fact, equally disconcerting, with almost all loop types falling in the 15-30% repeat trouble range.[102]

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[99] Tr. at 267.

[100] Covad, for instance, has a 30% rate of troubles that BellSouth has reported closed recurring within thirty days.

[101] Metric B.3.4.8.1.

[102] Monthly State Summary, Metric B.3.4.

While the faulty repair issue is clearly one part of the problem, BellSouth's discriminatory assignment of facilities referenced above is likely a contributing factor. BellSouth, it appears, may be assigning loop facilities to ALECs that it knows to be trouble-prone.[103] As a result, even when loop troubles are repaired, the problem is more likely to reappear than it would be on a circuit that BellSouth assigns for its own use.

2. Proposed Solutions

BellSouth should contact the ALEC prior to closing the trouble ticket. For xDSL orders, BellSouth must adhere to its stated process and allow joint acceptance testing of the loop before closing the trouble ticket. When BellSouth closes a trouble ticket based on "No Trouble Found," BellSouth should be responsible for tracking the ticket. Indeed, BellSouth should assume responsibility for the problem if subsequent troubles indicate that there was a BellSouth problem that was undetected at the time of the initial trouble ticket. In such an instance, BellSouth should credit the charges on the trouble tickets to the affected ALEC. This procedure will provide BellSouth an incentive to resolve the trouble when the first ticket is opened.

On a more general note, the Commission must ensure that BellSouth ceases its discriminatory loop facility assignment practices by requiring a detailed remediation program, employee training, performance measures and remedies for noncompliance. This will help dissipate the problem by preventing the routine assignment of second-rate loops to ALECs. The Commission should also order BellSouth to switch ALEC facilities following the second circuit outage in a given period of time (with ALEC concurrence, of course). This will help to remove

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[103] *See, for example,* Track A Hearing Transcript at pages 1404, 1408.

faulty circuits from service, and will also help BellSouth attain checklist compliance by reducing the number of repeat outages on ALEC circuits.

C. BellSouth Inaccurately Reports "No Trouble Found" (Priority 3)

1. The Problem

The maintenance and repair reports BellSouth provides to ALECs are inaccurate. As ALECs explained, BellSouth technicians are closing trouble tickets as "No Trouble Found" even when there was a problem detected and corrected. For example, in connection with the loss of dial tone problem, an ALEC will issue a trouble ticket, a BellSouth technician will be dispatched and discover that the ALEC's service is down because the jumper had been pulled. The technician will put the jumpers back in place, but close the trouble ticket as "No Trouble Found." Network Telephone reports a recent case where, despite the pleas of Network Telephone's Repair Supervisor for extraordinary effort to fix a customer with an out-of-service condition and his request for a call-back, BellSouth closed six consecutive tickets for this same customer to "No trouble found" without so much as a word to either the customer or Network Telephone personnel. Only days later was it discovered that this out-of-service condition was caused by a BellSouth central office problem. This practice of closing trouble tickets prematurely is epidemic among BellSouth's field forces and grossly overstates BellSouth's performance and masks BellSouth's faulty maintenance procedures. Accordingly, ALEC customers continue to be taken out of service by BellSouth technicians.

2. Proposed Solution

To solve this problem, BellSouth must contact and get concurrence from the ALECs before a ticket can be closed out. Additionally, at the closing of the ticket an automatic dispute process should be available that would force BellSouth to track "No Trouble Founds" that are disputed by ALECs.

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D.   BellSouth Prematurely Closes Trouble Tickets (Priority 4)

1.   The Problem

Closely related to the chronic troubles problem is that BellSouth's maintenance technicians are closing out repair tickets before calling the ALEC to ensure that the customer is actually back in service or that the problem is repaired.[104] Without confirmation from the ALECs that the trouble is repaired to the customer's satisfaction, BellSouth technicians cannot assess whether the problem has been resolved.

2.   Proposed Solution

The BellSouth technician should be required to record with whom he spoke to close the trouble ticket. If the technician did not receive an answer, he should record in the trouble ticket log the date, time and phone number called. Additionally, the technicians should record whether the ALEC approved the trouble ticket closure. KCI should audit this information in the trouble ticket logs.

E.   BellSouth Attempts to Make Repairs Outside Of Customer's Business Hours (Priority 5)

1.   The Problem

ALECs also encounter repair problems because BellSouth's maintenance technicians will go to the customer's premises after hours to fix a problem without making arrangements to have after-hours access when such access is necessary to resolve the problem, e.g. the demarcation point is inside the premises. AT&T, for example, specifies on its orders that access is only available during regular business hours. BellSouth, however, disregards these comments. Accordingly, the technician cannot gain access to the premises and either codes the trouble ticket

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[104] Tr. at 271.

as "no access" or closes out the trouble ticket. This causes customer dissatisfaction and undue delay in repairing the problem.

2. Proposed Solution

BellSouth should be required to train its technicians and discipline any employee who assigns a "no access" code to a trouble when the time noted on log is outside the customer's business hours and no other arrangements have been noted on the trouble ticket. Moreover, BellSouth should be required to provide to the Commission and ALECs the audit procedures (and results) it uses to ensure trouble tickets are processed and coded correctly.[105]

F. BellSouth's Maintenance Average Duration Demonstrates ALECs Receive Disparate Treatment (Priority 6)

1. The Problem

Network Telephone has developed a sophisticated in-house tracking system for all its customer repair problems. Data from that system was provided at the February 18 Workshop, which revealed that BellSouth takes three times as long to fix troubles for Network Telephone customers that are the fault of BellSouth. Actual data reveals that NTC had a total of 488 trouble tickets in December attributable to BellSouth as the causal agent, each taking an average of 31.33 hours to fix. (NTC had 279 total tickets in the same time frame, and they took only an average of 11.78 hours to fix.)

2. Proposed Solution

To solve this problem, BellSouth must contact ALECs to receive concurrence before closing out a trouble ticket. In this manner, both the ALEC and BellSouth should report the same time frame for end-user resolve.

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[105] This information could be supplied subject appropriate confidentiality agreements.

G. ALECs Experience An Excessive Number of New Install Failures (Priority 7)

1. The Problem

BellSouth is failing to install loops for ALECs on par with its own provisioning. Once again, this problem may be connected with BellSouth's discriminatory loop assignment procedures, which it assigns second-rate loops to ALECs, or it may simply be BellSouth technicians failing to exercise the same degree of care with ALEC loops that they use for retail installations. Whatever the cause, the end result is customer frustration with the ALEC and irreparable harm to the new ALEC/end user relationship.

As in other instances, BellSouth's data highlights the magnitude of the problem. For DS-1s that BellSouth provides to KMC in Florida, for example, one out of every four circuits that BellSouth installed in January, 2002 failed within 30 days.[106] For two-wire analog loops (designed), 8% of the BellSouth installs for KMC failed within the first 30 days after installation, on average, over the last eight months.[107] In contrast, BellSouth's retail offering of the same service fails less than 1%.[108] This disparity is unacceptable. Customers who switch their service to an ALEC expect to receive quality service. If the ALECs' circuits fail within the first 30 days of their new relationship with the customer, irreparable damage is done to the ALEC-customer relationship since the ALEC is viewed as an unreliable provider of telecommunications.

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[106] Tr. at 267.

[107] Tr. at 267. This is consistent with ALEC-aggregate performance, which indicates that nearly 13% of ALEC loops failed within the first 30 days (metric B.2.19.8.1.1, November, 2001).

[108] *Id.*

2.   Proposed Solution

Remedy payments alone are not likely to solve this problem. As ALECs have

experienced in Georgia, Louisiana, and other ILEC territories, remedy payments do not always

effect change.[109] The payments merely become a part of BellSouth's cost of doing business in

the state while it protects market share.[110] Accordingly, ALECs propose that BellSouth provide

nondiscriminatory access to loop facilities, undertaking the steps noted above, and that it not be

considered to be checklist compliant until such time as its performance demonstrates parity.

H.   BellSouth Does Not Accept Troubles It Causes During Migration (Priority 8)

AT&T has encountered the problem that when a customer's service has been impaired

during a migration, such as with missing features or services, BellSouth's Maintenance Center

will not accept AT&T's trouble report until after 5:00 p.m. regardless of the time of the

customer's conversion and where the provisioning error is attributable to BellSouth. If a

customer is migrated in the morning, this means that his service is incorrect for a lengthy period

of time and the ALEC is powerless to fix the problem. From the customer's eyes, the ALEC

appears to be inefficient and unreliable. Accordingly, BellSouth should be required to accept the

trouble from the ALEC and immediately correct the provisioning errors.

I.   BellSouth Does Not Notify ALECs Once Repairs Are Complete (Priority 9)

BellSouth does not call ALECs to inform them when the repairs ALECs have requested

are complete. If no such call is made, ALECs must expend resources to confirm the repairs are

made and to conduct its own testing of the service. ALECs also require timely notification so

that they can contact their customers to inform them that the repair is complete. BellSouth

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[109] Tr. at 268.

technicians should be required to call ALECs and record in the trouble ticket logs with whom

they spoke, or the date, time, and phone number called if no one answers the call. KPMG

Consulting, Inc. ("KCI") should audit this information.

VII. BELLSOUTH'S PERFORMANCE DATA REMAINS UNRELIABLE

BellSouth's performance data continue to suffer from data integrity problems that

preclude ALECs and this Commission from using it as an accurate indicator of BellSouth's

performance. At the workshop, ALECs testified that they believe BellSouth's data is

inaccurate.[111] ALECs' belief is well founded. BellSouth's performance reports are wrong, data

is missing, and BellSouth applies unauthorized exclusions to its performance measures

calculations. Moreover, the raw data BellSouth provides is insufficient to satisfy this

Commission's Order[112] and to permit ALECs to validate BellSouth's performance reports.

BellSouth attempts to address these issues in part, through claims of recent fixes and promises of

future fixes. Without independent auditing of the issues identified below, this Commission

cannot be assured that BellSouth's recent fixes have corrected the important data integrity issues

ALECs have identified.[113] Additionally, this Commission should give BellSouth firm deadlines

by which to implement its "future fixes." Once these fixes are put in place, the Commission

should require KCI to verify that the deficiencies have been corrected.

(Footnote cont'd from previous page.)

[110] Tr. at 268.

[111] Tr. at 254.

[112] Order, *In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies*, Docket 000121-TP, Order No. PSC-01-1819-FOF-TP, Sept. 10, 2001 at 56, 115.

[113] KCI is already reviewing two of BellSouth's recent fixes related to BellSouth's Average Completion Notice Interval.

A. BellSouth's Performance Reports And Performance Data Are Inaccurate (Priority 1)

1. The Problems

BellSouth's performance reports are wrong and are missing data. Some of the data included in the reports is inaccurate. Of particular concern is the fact that BellSouth's Flow Through reports continue to be wrong. For example, BellSouth's December 2001 Flow Through report indicated that Network Telephone submitted 73 LSRs via TAG.[114] The data cannot be correct because Network Telephone does not operate a TAG interface with BellSouth.[115] ITC also explained that a number of its orders are missing from the Flow Through report.[116]

In other instances, BellSouth's performance reports are missing data. ITC, for example, told this Commission that it has been "impossible" for it to reconcile its data because trouble tickets present in ITC's systems were not included in BellSouth's TAFI system or in BellSouth's raw data.[117]

Network Telephone has done extensive research on the BellSouth PMAP system. It consistently finds data missing, and "reposts" of data that just as often inflict new errors as fix any previous data. In addition, Miscellaneous Reports are created without proper descriptions of data content. While the Raw Data User's Manual ("RDUM") is updated monthly with BellSouth's changes, no data dictionary is provided for the Miscellaneous Reports.

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[114] Tr. at 249.

[115] Tr. at 249.

[116] Tr. at 254.

[117] Tr. at 254.

BellSouth also inaccurately reports data for its Acknowledgement Message Timeliness and Completeness measure. AT&T compared the LSR volumes in the acknowledgement raw data with the volumes in BellSouth's Flow Through report and discovered numerous discrepancies. When presented with this problem, BellSouth offered conflicting and inconsistent explanations for this data inaccuracy.[118]

2. Proposed Solution

ALECs believe the best solution for all of these issues is to require KCI to review carefully these issues as part of its audit of BellSouth's OSS.

B. BellSouth Applies Unauthorized Exclusions to Its Data (Priority 2)

1. The Problems

In order for ALECs to confidently rely on BellSouth's data and use it to verify the accuracy of BellSouth's reports, BellSouth must calculate its measures as set forth in its Service Quality Management ("SQM") Plan. As ALECs explained in the hearing, BellSouth applies unlisted, and therefore unauthorized, exclusions to its data. These unauthorized exclusions cause

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[118] BellSouth informed AT&T that the comparison was invalid because AT&T had not added fatal rejects and LNP orders. Additionally, BellSouth provided other reasons why the reports failed to match. First, BellSouth explained that the EDI volumes would not match and should not match because "EDI returns one acknowledgment per transmission (or envelope) even though the transmission may contain multiple LSRs;" whereas the flow-through report provides information at the LSR level. Letter dated January 21, 2002, from Bennett L. Ross, BellSouth to K.C. Timmons, AT&T at 1 (attached as Exhibit 4). This argument is in error because AT&T receives acknowledgements for individual LSRs it sends to BellSouth. Additionally, BellSouth claimed that the LSR volumes for TAG and LENS reported in the Acknowledgment raw data file and the Flow-Through report should not match because "TAG returns acknowledgments on messages related to pre-order activity, which are not reflected on the Flow-Through report." *Id.* BellSouth's explanation does not ring true for the UNE-P orders that AT&T referenced in its correspondence to BellSouth on these issues. In this regard, UNE-P pre-ordering activity is all conducted within the actual LSR that is sent to BellSouth *via* LENS; therefore, no additional acknowledgments for pre-order activity should be associated with such orders. Additionally, taking BellSouth's explanation at face value, there should be pre-order acknowledgements in TAG for every LSR that is sent *via* EDI. Based upon AT&T's examination of its December data, this clearly is not the case. Thus, BellSouth's explanations regarding the discrepancies in volumes reflected in its reports are inconsistent with its own data. AT&T has re-conducted its analysis regarding LNP and fatal rejects and the discrepancies continue.

ALECs to struggle to validate BellSouth's data because BellSouth's exclusions skew the results of important performance measures.

Covad, for example, discovered that BellSouth was excluding a high number of orders from the order completion measure because BellSouth applied an L code to these orders incorrectly[119] and thereby rendered the order completion measure meaningless.[120] This is not an insignificant problem: in November 2001, BellSouth excluded one third of Covad's orders.[121] KCI is not presently investigating the L code problem, and [122] under the current scope of the test, KCI will not do so in the future.[123]

In addition to improperly L coding orders and then excluding them, BellSouth also applies the following unauthorized exclusions to its self-reported ALEC data provided in PMAP. For example, BellSouth's Average Completion Notice Interval ("ACNI") is incomplete because BellSouth excludes:

- Completion notices issued in one month for orders completed in a previous month are excluded from the measure calculation and raw data;[124]

- Orders submitted directly into SOCS;[125]

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[119] L coded orders are orders in which the ALEC has requested completion within a longer or shorter interval than BellSouth's standard interval.

[120] According to BellSouth's SQM, L coded orders may be excluded properly from the order completion measure. However, Covad's orders should have been completed within BellSouth's standard interval.

[121] Tr. at 253. At the time of the hearing, Covad had not completed its analysis of whether all of these orders were improperly L coded by BellSouth.

[122] Tr. at 253.

[123] Tr. at 254.

[124] BellSouth has indicated that a "fix" is targeted for May data. This assertion cannot be confirmed until the final May data is available on July 1, 2002.

- Completion Notices for Standalone LNP orders (excluded from the ACNI measure and raw data); [126] and

- Completion Notices for LSRs classified as projects (excluded from the ACNI measure and raw data).

2.   Proposed Solutions

ALECs propose that this Commission resolve BellSouth's improper L coding of orders by requiring KCI to audit BellSouth's performance data using commercial ALEC data. The Commission has already tasked KCI with reviewing certain problems with the ACNI measure and with validating BellSouth's claim regarding directory order listings. Accordingly, KCI's review should be expanded to cover all of these data integrity issues.

C.   BellSouth Does Not Provide Raw Data Necessary to Verify the Accuracy of BellSouth's Reports (Priority 3)

1.   The Problems

BellSouth continues to withhold data that would permit ALECs and the Commission to analyze BellSouth's performance on important order types. BellSouth, for example, continues to exclude LSRs classified as projects from its raw data. As AT&T explained, if a customer places an order for 15 lines or greater, BellSouth classifies that order as a "project."[127] Without the raw

(Footnote cont'd from previous page.)

[125] BellSouth has provided ALECs flawed explanations and nonresponsive answers regarding the completeness of BellSouth's acknowledgement data and regarding completion notices submitted directly into SOCS. This Commission should require KCI to work with BellSouth and ALECs to resolve these issues.

[126] As AT&T explained, this problem affects thousands of AT&T's orders in Florida. Tr. at 248. In Georgia, BellSouth admitted this is a problem they are working to resolve. Mr. Varner's assertion that these LSRs were AT&T-generated trigger orders is baseless. BellSouth, not AT&T, issues trigger orders.

[127] Tr. at 246.

data related to the project, an ALEC cannot identify or monitor the service its largest customers

receive from BellSouth.[128]

Nor does BellSouth provide sufficient raw data to validate its Flow Through reports. For

example, BellSouth does not provide an LSR detail for the LNP flow-through report. In

connection with the on-going performance measures proceedings in Georgia, BellSouth

indicated that a form of the underlying data, but not the LSR detail, is now available upon

request. AT&T requested the information on February 4, 2002. BellSouth has not yet provided

this information.

During the course of the workshop, BellSouth claimed it now includes directory listing

orders in FOC and rejection measures.[129] In a letter to AT&T dated February 18, 2002, however,

BellSouth stated, "to the extent they are not excluded from a particular measure, directory listing

orders also appear in the raw data files for each of the ordering measures."[130] Accordingly, it

appears that BellSouth is once again applying unauthorized exclusions of data from its raw data

files.

2.   Proposed Solution

ALECs propose that BellSouth provide ALECs access to all of its raw data, including

raw data for project orders, BellSouth's LNP flow-through report, and directory listing orders.

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[128] Mr. Varner believes this issue is simply one of whether BellSouth must provide raw data that is not used in calculating performance reports. (Workshop presentation of Alphonso J. Varner at 18) Even if Mr. Varner's supposition is true, this Commission has ordered BellSouth to provide ALECs electronic access to raw data so that ALECs can verify the accuracy of BellSouth's reports. FL Order 9/10/01 in 000121-TP at 56 and 115.

[129] Tr. at 265. KCI is in the process of reviewing this information. Under the current schedule, KCI's data integrity review will not be complete until July 2002.

[130] Letter dated February 18, 2002, from Bennett L. Ross, BellSouth, to K.C. Timmons, AT&T at 3 (attached without enclosures as Exhibit 5).

D. Report Validation Problems BellSouth Claims Are Corrected Must Be Validated (Priority 4)

In its Commercial Experience Issues list submitted to the Commission prior to the workshop, AT&T noted that ALECs could not replicate FOC and reject intervals from the raw data provided by BellSouth.[131] BellSouth's Mr. Varner alleges that BellSouth has corrected this problem as of December 2001 for AT&T and as of January 2002 for ALECs.[132] While it appears that BellSouth has resolved this issue for AT&T's data, it is not clear whether the January fix will resolve this problem for all ALECs. Accordingly, KCI should be tasked with reviewing this important area.[133]

Similarly, AT&T informed this Commission that it could not replicate the FOC and reject intervals from PMAP raw data for LSRs submitted in one month but FOC'd or rejected in a different month because it did not have the necessary data. BellSouth has now provided this data to AT&T.[134] AT&T's preliminary review indicates BellSouth now provides the missing information. KCI, however, should review this data as part of the third-party test on a going-forward basis.

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[131] AT&T Commercial Experience Issues, filed Feb. 4, 2002 in dockets 960786-B-TL and 981834-7P at 4.

[132] Workshop presentation of Alphonso J. Varner at 18.

[133] ALECs, moreover, are unsure why BellSouth did not implement a universal fix for this problem in December. Accordingly, this Commission should require BellSouth to investigate whether a data integrity problem brought by one ALEC affects all ALECs, and if a problem is discovered, BellSouth should implement a concurrent universal fix.

[134] At the workshop, Mr. Varner stated that AT&T possessed the data necessary to replicate this interval. At the time the issue list was filed, AT&T had not received the data.

Finally, as BellSouth admits, its jeopardy notice interval has been incorrect for the almost a year.[135] This Commission should require BellSouth to correct this measure and, once corrected, have KCI audit this measure.

VIII. BELLSOUTH'S CHANGE CONTROL PROCESS REMAINS INADEQUATE -- SIGNIFICANT CHANGES ARE NECESSARY (PRIORITY 1)

ALECs agree that BellSouth's CCP is so deficient that any modifications that operate to the ALECs' benefit are welcome. BellSouth's most recent MSS report confirms this assertion. In January 2002, BellSouth failed 2 of 3 change control measures. Some of the modifications that BellSouth has made, or proposes to make, will benefit the ALECs. However, as long as BellSouth retains its power to make the final, exclusive determination as to what change requests will be implemented, and when – a power that BellSouth's modifications do not alter – the CCP will not afford competitors a meaningful opportunity to compete. BellSouth must make additional, substantial revisions in the CCP in order for the process to be meaningful.[136]

At the request of the Georgia Public Service Commission Staff, a coalition of ALECs submitted a "red-line" version of the CCP Document to that Commission on January 30, 2002 containing the ALECs desired changes to the process.[137] The following are examples of the substantial revisions the ALECs included in that red-line:

- Implementation deadlines for all types of changes should be included. This will ensure that the proper level of resources is committed to support the implementation of changes. Type 4 and Type 5 changes should be implemented no later than 60 weeks after their prioritization.

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[135] Tr. at 264. The jeopardy notice interval has been incorrect since June 2001.

[136] As ALECs explained, BellSouth's 40% proposal does noting other than maintain the status quo.

[137] A copy of that red-line was provided directly to the FPSC Staff when it was submitted in Georgia and is attached as Exhibit 6.

- A "go/no go vote" process should be implemented for software releases. This will ensure that a scheduled change will go forward only with the ALECs' consent and that ALECs can stop a planned change that may cause problems in the OSS, based on testing or on a review of documentation when testing is unavoidable.

- In sizing and sequencing change requests prioritized by the ALECs, BellSouth should begin with the top-priority items and continue down through the list until the capacity constraints have been reached for each future release. This will ensure that ALECs have a meaningful voice in prioritization, and that the priorities assigned by the ALECs will be implemented.

- A new position should be created within the CCP, the "Designated ALEC Co-Moderator." That person would function as a co-moderator in presenting and monitoring the progress of pending change requests and within the BellSouth internal process.

- ALECs should be given the opportunity to meet directly with the BellSouth managers who make the final decisions on implementation and prioritization of change requests, along with their subject matter experts ("SMEs"). This will ensure that ALECs can discuss change requests directly with the BellSouth personnel who actually make the final decisions on change requests and their SMEs, rather than merely with "go-betweens."

- BellSouth should be required to provide ALECs with a written explanation whenever it rejects a proposed change request. This will assist the ALECs in determining whether a valid basis exists for the rejection. In any case where BellSouth rejects a proposed change request, its explanation should not simply be that the change is "against policy" (an explanation that BellSouth has frequently given in the past). Instead, BellSouth should explain precisely why the change was rejected. In addition, BellSouth should be required to make "requests for additional information" about a change request only when it legitimately needs such information – and not to use such requests as a means of delaying or thwarting ALEC-initiated change requests.

- No arbitrary limitation should be placed on the number of BellSouth releases each year. This will ensure that changes are not unduly delayed by a limited number of releases, and that changes will be implemented more according to demand and ALEC need.

- BellSouth should not consider any internally generated change requests unique to the ALEC wholesale OSS within its internal process until after the request has been subject to prioritization by the ALECs. Thus, the scope of the CCP should be expanded to include: (1) the development of new interfaces; and (2) changes to linkage systems such as LEO and LESOG, and BellSouth's legacy systems. This will ensure that the CCP encompasses all changes to the OSS that directly affect ALECs.

- The existing definition of "ALEC affecting changes" subject to the CCP should be amended to clarify that it is broad, rather than restrictive, in nature. The definition should make clear that the BellSouth linkage and legacy systems and processes above are also "ALEC affecting." ALECs should be provided notice and an opportunity to test when these systems/processes are changed.

- The CCP should be amended to make clear that it includes changes to BellSouth's billing systems. As previously stated, notwithstanding the language of the CCP document, BellSouth currently (and erroneously) maintains that billing is outside the scope of the CCP.

- The materials ("Change Review Package") that BellSouth is required to distribute before a change review meeting should include not only a schedule of releases, but a description of the capacity of each release. This will ensure that the ALECs will learn in advance of any capacity limitations of the release.

- Each quarter, BellSouth should provide a release capacity forecast covering the remainder of the current calendar year and the following calendar year, including descriptions of the items to be included in each future release. The quarterly report that BellSouth has agreed to provide, by contrast, would encompass only year-to-date capacity used for ALEC requests, and the next scheduled release – not other future releases.

- The CAVE testing environment should be upgraded to meet the ALECs' needs as stated in the original change request and subsequently determined to be required by use of CAVE as implemented. BellSouth should not require ALECs to use codes other than their own in the testing environment, or limit the number of participating ALECs or test scenarios used in that environment.

Finally, one of the most fundamental changes that BellSouth can make to its CCP is to make ALECs partners in the process. This Commission understood that ALECs "want to look at the criteria that is being used for ALEC changes and they also want to look at the criteria BellSouth uses."[138] BellSouth still has not understood that point. No matter how many times and in how many different venues ALECs have presented this idea to BellSouth, BellSouth has resisted incorporating ALECs as part of a real-time team. As the workshop made clear,

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[138] Tr. at 235.

BellSouth still does not want to include ALECs as partners in the CCP.[139] This is perhaps, the most striking difference between the practical implementation of BellSouth's and Verizon's CCPs. Similarly worded, or even identical plans, can have dramatically different results based on their administration. Verizon includes ALECs and treats them as partners. BellSouth excludes ALECs and prevents them from having an effective voice in the CCP.

The ALEC "red-line" and BellSouth response "green-line" provide clearly defined positions upon which the parties and regulators can (1) continue to evolve the process through negotiation and (2) resolve issues that persist following negotiation. A "Change Control Process Improvement Workshop" has been scheduled for March 28, 2002 to continue the negotiation process. The Florida PSC should monitor this workshop and be prepared to render timely decisions on those issues upon which the parties are unable to reach agreement.

IX. CONCLUSION

The testimony ALECs presented at the workshop reveals significant deficiencies exist in all facets of BellSouth's OSS. These problems must be resolved if ALECs are to compete effectively in Florida.
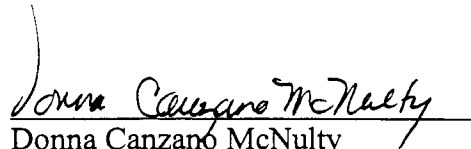
As ALECs have shown, many of the solutions to these problems only require BellSouth to fulfill its existing obligations or follow its current procedures. Other solutions involve re-training employees or permitting ALECs to participate in the decision-making processes that directly impact their businesses. Other solutions, for example those related to data integrity, may require some effort on the part of BellSouth. Providing accurate and complete data, however, is

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[139] Throughout BellSouth's response to the ALEC "red-line" CCP, which was filed with the GPSC on February 15, 2002, BellSouth maintains that it needs to exclude ALECs from the process in order to conduct its business.

of such fundamental importance, this Commission should require BellSouth to implement whatever corrections are necessary to remedy this important problem.

BellSouth has provided response after response to the issues ALECs raised at this workshop and in other proceedings. Solutions are necessary for these important problems. This Commission should require BellSouth to implement the solutions ALECs have proposed and should require KCI to verify that the deficiencies have been corrected. Only then can this Commission be assured BellSouth is providing nondiscriminatory access to its OSS and be in a position to recommend approval of BellSouth's 271 application.

RESPECTFULLY SUBMITTED this 18th day of March, 2002.

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        AT&T BROADBAND PHONE OF FLORIDA, LLC
    COVAD COMMUNICATIONS
    FLORIDA DIGITAL NETWORK
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I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 18th day of March, 2002.

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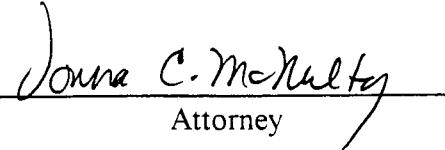6801 Morrison Blvd.
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ALEC SPECIFIC PRIORITIZATION

I. PREORDERING

ISSUE	AT&T	Covad	FDN	ITC	MCI	Network	KMC
Inability to integrate preordering and ordering functions	1	1	3	3	1	1	3
Customer Service Records are incorrect • CSR does not agree with RSAG and switch data base information • Pre-migration CSR does not reflect what is on the customer's line • Post-migration CSR is not updated	2	3	1	1	2	2	1
Inability to view and resolve pending service orders	3	5	2	2	3	4	2
FRN via EDI at no cost	5	6	4	4	4	3	5
EDI is not available for preordering. ALECs must use LENS or TAG a proprietary CORBA interface	6	2	5	5	5	5	4
LFACs issues: • fails to contain accurate and complete facilities information (COVAD) • lack of access to LFACs	4	4	6	6	6	6	6

Exhibit 1

II. ORDERING

ISSUE	AT&T	Covad	FDN	ITC	MCI	Network	KMC
Inadequate mechanized order processing -- manual handling of orders is excessive	1	1	6	1	1	6	2
BellSouth does not remove the ADSL USOC	2	2	1	2	2	1	1
Invalid clarifications	3	3	3	3	3	3	3
PIC Freeze is not being removed upon customer request	4	4	2	4	4	2	7
Incomplete clarifications	5	5	4	5	5	5	5
LCSC Escalation	7	6	5	6	6	4	6
Incomplete FOCs	9	7	7	7	7	7	4
Continued problems with Due Date Calculator	8	8	8	8	8	8	9
Ordering System Outages	6	9	9	9	9	9	8

III. PROVISIONING

ISSUE	AT&T	Covad	FDN	ITC	MCI	Network	KMC
Provisioning accuracy poor	1	1	3	1	1	3	3
Premature Disconnects	2	2	2	2	2	1	2
Excessive pending facilities	4	7	1	3	3	2	1
Problems with Jeopardy notification process	3	6	4	4	4	4	4
Improper rejection of disconnect orders	8	8	5	5	5	5	5
UCL-ND provisioning issues continue with CO work not being completed on FOC, loops not delivered on FOC, no calls to COVAD to advise of Demarc or close of trouble tickets.	7	3	6	6	6	6	8
Line share orders completed in 5 days, BellSouth contract interval is 3 days.	5	4	7	7	7	7	7
Line share orders provisioned with load coils	6	5	8	8	8	8	6

IV. MAINTENANCE AND REPAIR

ISSUE	AT&T	Covad	FDN	ITC	MCI	Network	KMC
Loss of Dial Tone	1	1	1	1	1	3	2
Chronic Troubles	2	2	3	2	2	4	1
Inaccurate reporting of no trouble found.	3	3	2	3	3	1	3
Premature closing of tickets	4	4	4	4	4	5	4
Attempting to make repairs after customer's business hours.	5	5	5	5	5	6	5
Disparate treatment of Maintenance Average Duration between NTC and BellSouth.	7	6	6	6	6	2	6
New Install Failures	8	7	7	7	7	7	7
BellSouth does not call CLEC once repair is complete.	6	8	8	8	8	8	8

V. DATA INTEGRITY/PERFORMANCE MEASURES

ISSUE	AT&T	Covad	FDN	ITC	MCI	Network	KMC
BellSouth's Performance Data Problems 1) Inaccurate Flow Through reports 2) Trouble tickets are missing 3) Discrepancies in Acknowledgement Completeness measure 4) Jeopardy notice interval not properly calculated	1	1	1	1	1	1	1
BellSouth excludes data 1)Improper "L" coding of orders excludes certain orders from Order Completion Interval 2) ACNI Reports	2	2	2	2	2	2	2
Missing Raw Data	3	3	3	3	3	3	3
Future Fixes must be validated	4	4	4	4	4	4	4

VII. CHANGE MANAGEMENT

ISSUE	AT&T	Covad	FDN	ITC	MCI	Network	KMC
Change Control Process remains inadequate and doesn't provide timely change requests	1	1	1	1	1	1	1

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Exhibit 2

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Subject: RE: need pre-order rules for Parsed CSR

BCCM:
Here are just a few of the critical pieces of info lacking in what BST has provided in support of Parsed CSR to date:
* TXNUM is defined as required, but does not appear in the API document.
* The valid values for TXTYP are defined as "BellSouth suggested valid values".
* TOS is defined as required for responses, but is not present in the API document.
* There is no definition of how lists of information are related, e.g., there is a list of listed TNs and a list of Listed Name - How are these related?

These are just more examples of the poor quality of documents provided by BST to the CLEC community. This bad information increases CLEC costs, decreases CLEC efficiency and elongates the conversion window from BST to CLECs. Bottomline, end users will be negatively impacted.

    Io in BST is responsible to review/compare your API docs with Business Rules to ensure they are in synch? When will BST provide updates to the Pre-Order rules?
Bernadette Seigler

District Manager
AT&T Local Services & Access Management
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> -----Original Message-----
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> Subject: need pre-order rules for Parsed CSR

 JCCM:
> Glad to see that TAG API 7.7 was finally posted on Friday however we still
> do not have all info needed.
> When will the Pre-Order Business Rules for Parsed CSRs be issued/posted as
> they are not covered in the two docs posted below?
> #1 BellSouth Pre-Order Business Rules Nov 2001 - Version 11 D
>
> #2 BellSouth Pre-Order Business Rules - Data Dictionary Nov 2001 -
> Version 7C
>
> Bernadette Seigler
> District Manager
> AT&T Local Services & Access Management
> So. Region OSS Interconnection
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Exhibit 3

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Subject: need pre-order rules for Parsed CSR

BCCM:
Glad to see that TAG API 7.7 was finally posted on Friday however we still do not have all info needed.
When will the Pre-Order Business Rules for Parsed CSRs be issued/posted as they are not covered in the two docs posted below?
#1 BellSouth Pre-Order Business Rules Nov 2001 - Version 11 D

#2 BellSouth Pre-Order Business Rules - Data Dictionary Nov 2001 - Version 7C

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January 21, 2002

Mr. K. C. Timmons
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AT&T Local Services – Southern Region
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      Re: *Performance Measurements for Telecommunications Interconnection, Unbundling and Resale;* Docket No. 7892-U

Dear K.C.:

Pursuant to our discussions at the workshops in the above-referenced proceeding, this letter is in response to the performance data issues raised in your e-mails to the AT&T account team. Each issue is summarized below, which is followed by BellSouth's response.

Comparison of Flow Through Report and Acknowledgment Raw Data

In your e-mail, you expressed concern about "significant discrepancies" between the number of Local Service Requests ("LSRs") as reflected in the Flow Through report for OCNs 8392, 8389, 8300, 7421, and 7125 for October 2001, as compared to the number of LSRs reflected in the raw data files for the Acknowledgment Message Timeliness and Completeness measures for the same month. You stated your expectation that "the volumes between these two reports" should match.

In fact, you should not expect the volume of LSRs reflected on the Flow Through report to match the number of LSRs in the raw data files for the Acknowledgment measures. There are multiple reasons why this is so, none of which has to do with "proper exclusions to the raw data," as suggested in your e-mail. First, EDI returns one acknowledgment per transmission (or a "envelope"), even though the transmission may contain multiple LSRs. Second, TAG returns acknowledgments on messages related to pre-order activity, which are not reflected on the Flow Through report. Third, Local Number Portability ("LNP") acknowledgments are included in the raw data for the Acknowledgment measures, but are reported separately on the LNP Flow Through report. Fourth, LSRs fatally rejected by TAG will receive an acknowledgment and be

Exhibit 4

included in the Acknowledgment raw data files, but will not be counted in the Flow Through report, since only LSRs rejected by LEO are counted as a fatal reject.

Please understand that these reasons alone do not explain the differences in the Flow Through results and Acknowledgment raw data noted in your e-mail for October 2001. This is because, as AT&T has previously been advised, BellSouth discovered that PMAP was not receiving feeds from two of its four TAG processors prior to November 7, 2001, which resulted in the acknowledgment count from TAG being understated. This issue was a reporting issue only and did not affect BellSouth's ability to receive and respond to LSRs submitted via TAG or any other interface. This issue was resolved on November 7, 2001, which was after BellSouth reported October 2001 results upon which you relied for purposes of your analysis. However, in future months, you should not expect to see the number of LSRs reported in the Flow Through report match the number of LSRs in the raw data files for the Acknowledgment measures, for the reasons previously explained.

Comparison of Firm Order Confirmation and Reject Response Completeness Raw Data With Firm Order Confirmation Timeliness and Reject Interval Raw Data

In your e-mail, you provided the results of your comparison between the Firm Order Confirmation ("FOC") and Reject Response Completeness raw data with the FOC Timeliness and Reject Interval data for September 2001, noting that these raw data files "are still not agreeing with each other." You provided specific examples of the discrepancies, each of which is explained below.

"There are 480 LSRs in the Response Completeness raw data that have a 1, 2, or 3 in the "RESP_CNT" field (which means they either received a FOC or Reject) that did not have a corresponding LSR populated in the FOC or Reject raw data."

Of the 480 LSRs in FOC and Reject Response Completeness raw data that AT&T claims are not in FOC Timeliness or Reject Interval raw data, 474 are, in fact, in BellSouth's September 2001 Reject Interval raw data. These 474 records are indicated in the attached supporting data file ('sep 01 response completeness analysis - Response.xls') by the text "Found in BST September 2001 Reject Interval raw data," which appears in the column titled "BellSouth Comment."

The remaining six LSRs do not appear in the September 2001 Reject Interval raw data because, while the LSRs were received in September, they were responded to on October 1, 2001. The FOC Timeliness and Reject Interval reports only capture responses sent in the reporting month regardless of when the LSR was received. By contrast, the FOC and Reject Response Completeness measure currently captures only LSRs received in the reporting month and responded to prior to the data snapshot being taken (generally on the 2nd day of the month).

As a result, these six LSRs are reflected in the September 2001 FOC and Reject Response Completeness raw data, but not in the September 2001 FOC Timeliness or Reject Interval raw data. These six records are indicated in the attached supporting data file ('sep 01 response completeness analysis - Response.xls') by the text "Responded to on October 1, 2001," which appears in the column entitled "BellSouth Comment."

"There are 6 LSRs in the Response Completeness raw data file with a 0 in the "RESP_CNT" field that do have a corresponding LSR populated in the FOC or Reject raw data. If they have a 0 in the "RESP_CNT" field, then they should not have a FOC or Reject reported."

In identifying six LSRs in the FOC and Reject Response Completeness raw data file with a '0' in the RESP_CNT field that do not have corresponding LSRs populated in FOC Timeliness or Reject Interval raw data, AT&T matched the raw data by Purchase Order Number ("PON") and version. These six PON/version combinations were each submitted twice by AT&T with two different OCNs, 8300 and 8392. For each PON/version combination, one LSR received a response and one did not. AT&T was matching the LSR that did receive a response, as indicated by the record in FOC Timeliness or Reject Interval raw data, with the LSR that did not receive a response, as indicated by the '0' in the RESP_CNT field of FOC and Reject Response Completeness raw data. However, these records do not actually match and there is no actual discrepancy, as the OCNs are different. These six LSRs are indicated in the attached supporting data file ('sep 01 response completeness analysis - Response.xls') by the text "This OCN/PON/VER combination is not in September 2001 Reject Interval or FOC Timeliness raw data," which appears in the column entitled "BellSouth Comment."

"There are 17 LSRs populated in the FOC or Reject raw data that are not present in the Response Completeness raw data."

The 17 LSRs found in FOC or Reject raw data that are not present in the FOC and Reject Response Completeness raw data for September were received in August and responded to in September. As explained above, the FOC Timeliness and Reject Interval reports only capture responses sent in the reporting month regardless of when the LSR was received, while the FOC and Reject Response Completeness measure currently captures only LSRs received in the reporting month and responded to prior to the data snapshot being taken. These 17 records are identified in the attached supporting data file ('sep 01 foc and reject raw data post exclusions - Response.xls') by the text "Received in August 2001 and responded to in September 2001" in the column named "BellSouth Comment."

Your e-mail also notes a "discrepancy" between the May 2001 raw data filed provided to AT&T by Viki Clayton and the May 2001 raw data file that AT&T downloaded from PMAP. The raw data files provided to AT&T by Ms. Clayton contain 721 records for OCN 8392. The first 606 records in this file match and are in the exact same order as the records in the file that

"AT&T pulled from PMAP...." However, the data provided on the PMAP website is not provided in MS Excel format, and it appears that the record set was truncated when AT&T loaded the data into Excel. Thus, this "discrepancy" noted in your e-mail was apparently caused by AT&T in downloading and populating the performance data, and not in BellSouth's reporting of that data. In fact, AT&T sent BellSouth a letter dated August 2, 2001 setting forth an analysis of raw data for May 2001, which, according to AT&T, contained 721 records. Since Ms. Clayton did not provide AT&T with the raw data file at issue until October 1, 2001, AT&T apparently had in its possession a raw data file for FOC and Reject Response Completeness for May 2001 with a record count of 721, which is the same record count in the files provided to AT&T by Ms. Clayton.

<u>Comparison of Order Completion Interval Raw Data and
Average Completion Interval Raw Data</u>

In your e-mail, you provided a comparison of the Order Completion Interval ("OCI") raw data with the Average Completion Notice Interval ("ACNI") raw data. In making this comparison, you combined raw data files, because there are two raw data files for OCI and ACNI, one containing LNP data and the other containing non-LNP data. Your e-mail identified 1,412 LSRs that were completed during the month but which, according to AT&T, were not contained in the ACNI raw data files as having received a completion notice.

BellSouth has reviewed each of the 1,412 LSRs and has no reason to believe that completion notices were not actually sent for these service requests. That these LSRs did not appear in AT&T's ACNI raw data file is due to the following reasons:

First, approximately 309 of the LSRs were directory listing orders (class of service codes LNPRL and LNPBL). As you are aware, directing listing orders are excluded from the ACNI measure, and thus these types of orders would not appear in the ACNI raw data files.

Second, approximately 954 of the LSRs are trigger orders for standalone LNP, which did not carry an OCN on the LSR that would identify it as an AT&T order. As a result, these LSRs were listed in the raw data files as BellSouth orders. BellSouth has begun implementing a process to capture the OCN on trigger orders for standalone LNP, which should be completed with January 2002 data.

Third, 140 LSRs were projects, which, consistent with the Service Quality Measurement ("SQM") Plan, are excluded from the ordering raw data. LSRs excluded from ordering raw data are placed in an "error" file. BellSouth has discovered that, in matching completion notices with LSRs, PMAP was not looking at LSRs in this "error" file. BellSouth has begun implementing the necessary coding changes to capture for ACNI purposes those LSRs excluded from the ordering raw data, which should be implemented with January 2002 data.

Fourth, 7 of the LSRs are listed with OCNs other than AT&T's. In order to investigate these records further, AT&T will need to provide BellSouth with the telephone number from these orders.

Finally, 2 of the LSRs appear in the November ACNI raw data rather than in the October raw data files. This is due to an insignificant number of transactions closed toward the end of a given calendar month when technicians and field representatives fail to submit the paperwork or successfully close out or post the orders in a timely manner. Because BellSouth leaves the "processing window" open for a few days into the following calendar month to capture as many of these transactions as possible, the impact of these data exclusions is insignificant (typically less than 2% of all orders). BellSouth has a release planned to address this completion date grouping issue, which should be implemented with March or April data.

BellSouth has accounted for each of the 1,412 LSRs at issue and has explained why they did not appear in AT&T's ACNI raw data file for October 2001 (some LSRs did not appear for more than one reason). BellSouth recommends that the parties review ACNI raw data in a future month as part of an ongoing reconciliation process.

Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices
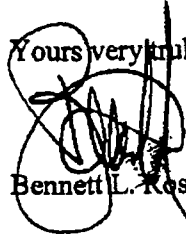
Your e-mail also questioned BellSouth's failure to include in the Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices measure those jeopardy notices issued on the same day as the committed due date. Your e-mail claims that, "by not counting its jeopardy notices, BellSouth is incorrectly reporting the percent jeopardy measure, and the average jeopardy notice interval is being incorrectly inflated" – a claim BellSouth denies.

As clearly set forth in the current SQM, the Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices measure is intended to capture "advance notice" provided to the CLEC "when BellSouth can determine in advance that a committed due date is in jeopardy for facility delay ...." The business rules make clear that the measure was not intended to capture jeopardies due to facility delays that BellSouth cannot detect in advance. Obviously, if BellSouth only detects a facility problem when the technician is on the premises to provision the loop on the due date, "advance notice" that the committed due date is in jeopardy would not be possible and thus would not be subject to this measure. While BellSouth and AT&T may disagree with the correct interpretation of the current measure, it was agreed in our recent workshops that jeopardies identified on the due date should be excluded from this measure (at least when the BellSouth technician is on the premises attempting to provide service and must refer to engineering or cable repair records for facility jeopardies), and an explicit exclusion to this effect has been proposed for inclusion in the next version of the SQM.

I hope this information adequately addresses AT&T's concerns. If you would like to meet personally with representatives of BellSouth to discuss these issues in greater detail, please let me know, and I will make the necessary arrangements.

Yours very truly,

Bennett L. Ross

BLR:nvd
Enclosures

cc: Mr. Leon Bowles (w/o enclosures)
Suzanne W. Ockleberry, Esquire (w/o enclosures)

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February 18, 2002

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> Re: *Performance Measurements for Telecommunications Interconnection, Unbundling and Resale;* Docket No. 7892-U

Dear K.C.:

This letter is in response to your January 28, 2002 letter concerning the "data integrity" issues discussed at the workshops in the above-referenced proceeding and which responded to my letter of January 21, 2002. It appears that we are making some progress, and outlined below is BellSouth's response to the additional questions you have raised.

Comparison of Flow Through Report and Acknowledgment Raw Data

In your January 28, 2002 letter, you did not appear to disagree with the notion that the volume of Local Service Requests ("LSRs") reflected on the Flow Through report will not necessarily match the number of LSRs in the raw data files for the Acknowledgment measures. As your letter notes, one reason why this is so is because EDI returns one acknowledgment per transmission (or a "envelope"), even though the transmission may contain multiple LSRs. You are correct that the volume for EDI LSRs in the Flow Through report should be greater than or equal to the volume of EDI LSRs in the Acknowledgement raw data files. However, in the October 2001 snapshot referenced in your letter, it appears that you neglected to take into account those LSRs that are fatally rejected. When you take fatal rejects into account for October 2001, you will see that the volume of EDI LSRs in the Flow Through report is greater than or equal to the volume of EDI LSRs in the Acknowledgement raw data files. Attached please find a revised snapshot for October 2001 to illustrate this point.

With respect to your question about whether there are "actually four processors that are not feeding data to PMAP," the answer is "no." To the extent AT&T thought that there were two LENS processors not feeding data to PMAP, these two processors are actually TAG processors dedicated to LENS. I apologize for any confusion on this point. However, regardless of how

Exhibit 5

these two processors are labeled, the necessary feeds to PMAP were established in November 2001, and the anomalies with data reported before these feeds were put in place have subsequently been resolved. I suggest that you review the raw data from December 2001, and let me know me know whether AT&T has any outstanding questions on this point.

Comparison of Firm Order Confirmation and Reject Response Completeness Raw Data With Firm Order Confirmation Timeliness and Reject Interval Raw Data

In response to your question about when BellSouth implemented tne PMAP modification to include LSRs that receive a Firm Order Confirmation ("FOC") or are rejected in a different month from when the LSR was received, the FOC Timeliness Report has always included all FOCs sent within the reporting month, regardless of when the LSR was received. This is clear from raw data for as far back as December 2000. However, prior to August 2001 data, an LSR must have been both received and rejected within the reporting month to be included in the Reject Interval report. Beginning with August 2001 data, the Reject Interval report began including all LSRs rejected within the month, regardless of when they were received.

With respect to your request that "BellSouth include the received date and time in addition to the FOC or reject date and time, regardless if the LSR was received in a different month," due to the PMAP database structure, "received" records are created for each LSR, but these records are not necessary to obtain the start time for the FOC or Reject duration. For Fully and Partially Mechanized records, the field CREATE_TS in the FOC or Reject record can be used as the start time for FOC or Reject duration. For Non-Mechanized LSRs, the field FIRST_RCVD in the FOC or Reject record can be used as the start time for FOC or Reject duration. These fields have the same value as the TD_STATUS_UPDATE field of the "received" records associated with the same LSR. BellSouth will provide dates and times in the CREATE_TS, FIRST_RCVD, and TD_STATUS_UPDATE fields in FOC Timeliness and Reject Interval raw data beginning with January 2002 data. BellSouth also is in the process of reproducing AT&T's December 2001 raw data with dates and times.

In your letter, you question why an LSR would not receive a response from BellSouth, indicating that "every LSR should receive either a reject or FOC." If a newer version of an LSR is received prior to BellSouth responding to the previous version, a response will not be sent to the previous version of the LSR. For example, each of the six LSRs mentioned in your letter was version '00'. In each case, a version '01' of the same cc/pon combination was received within 30 minutes of the receipt of the version '00', and prior to BellSouth responding to version '00'. Under such circumstances, BellSouth would not respond to version '00', and it will receive a RESP_CNT of zero in the FOC and Reject Response Completeness raw data. It should be noted that LSRs supplemented before a response from BellSouth is received should be excluded from the O-7, O-8, and O-11 Ordering measures, because these LSRs are, in effect, canceled by the

CLEC. BellSouth is making the necessary coding changes to ensure the proper application of the cancelled LSR exclusion with January 2002 data.

Comparison of Order Completion Interval Raw Data and Average Completion Interval Raw Data

BellSouth does not agree with your assessment that there were "over 1,000 LSRs being incorrectly excluded" from the raw data files for Average Completion Notice Interval ("ACNI"). On the contrary, as set forth more fully in my January 21, 2002 letter, each of the 1,421 LSRs which AT&T claimed were "missing" from ACNI raw data were fully accounted for. While AT&T may not agree with the exclusions for directory listing orders or projects, these exclusions are properly set forth in BellSouth's Service Quality Measurement ("SQM") plan, and this hardly constitutes a "data integrity" issue.

Concerning the seven (7) LSRs that were listed with OCNs other than AT&T's, BellSouth does not have Purchase Order Number as you requested. However, we do have the following service order numbers, which I assume will suffice: CQF4P848; CXKNC098; C4X63822; C43L9701; CR8W21Q2; NO0B0Q59; and CYDDWCMO.

Consistent with my letter, BellSouth is prepared to meet with AT&T to review ACNI data "when the other fixes have been implemented." Because most of these fixes are expected to be implemented with January 2002, we can either review January 2002 data, which will be available the end of this month, or wait to review February 2002 ACNI raw data. Please let me know which you prefer.

Other Issues

Attachment 2 to your letter contains what AT&T characterizes as "data integrity issues" discussed at the Georgia performance measurements workshops, and your letter requests a status report for each of these issues. First, BellSouth does not agree with this characterization, since many of these issues having nothing to do with "data integrity." Second, the "data integrity issues" that required further action from BellSouth were set forth in the Action Item logs prepared by the parties; many of the issues in your Attachment 2 do not appear on these Action Item logs, and BellSouth was unaware that these matters were still of concern to AT&T.

However, in an attempt to be responsive, set forth below is a brief status of the issues you have raised, to the extent they have not already been addressed above.

Directory listing orders – Directory listing orders are included in the Flow-Through report. To the extent they are not excluded from a particular measure, directory listing orders also appear in the raw data files for each of the ordering measures.

LSRs classified as projects – Since projects are subject to an exclusion under the SQM, the raw data is not provided. Consistent with the treatment of other exclusions, BellSouth has no plans to include projects in the raw data files.

Dummy FOCs – Dummy FOCs have been included in the raw data files for the FOC Timeliness report since August 2001.

Completion Notices – BellSouth expects the Average Completion Notice Interval report to capture completion notices issued in one month for orders completed in a different month with April 2002 data. With respect to the status of "completion notices for orders submitted directly into SOCs," you presumably are referring to non-mechanized orders that BellSouth service representatives receive via facsimile and enter directly into BellSouth's Service Order Administration system. BellSouth does not send confirmation notices on non-mechanized orders, and BellSouth has no plans to do so, particularly given the industry's emphasis on electronic ordering and provisioning processes. However, AT&T can ascertain when a non-mechanized order was completed by obtaining this information from BellSouth's CLEC Service Ordering Tracking System ("CSOTS").

Null values – With respect to your request for the status of "null values" being excluded from the Average Completion Notice Interval measure, the issue concerned Completion Notices being sent almost instantaneously, which were assigned a "zero" interval and which were not being captured in the Average Completion Notice Interval report. BellSouth implemented a change to assign a default interval of one minute to these notices, which was completed with September 2001 data. BellSouth subsequently identified and corrected a few minor coding issues associated with this change with December 2001 data.

Multiple entries – The issue of multiple entries being recorded for the same Completion Notice and applied in the calculation for the Average Completion Notice Interval report was corrected with December 2001 data.

LNP Completion Notices – The issue associated with completion notices for LNP orders in the Average Completion Notice Interval report was corrected with November 2001 data, as BellSouth previously indicated.

Average Jeopardy Notice Interval – As explained in BellSouth's Third Notice of Filing Corrective Action Plans dated February 1, 2002, this measure continues to capture data that is not meaningful. The data under this measure reflects the difference between the date and time that the advanced notice of facility jeopardy is provided and the date and time the order is completed. However, the interval should be based on the current due date, not on the final order completion date. Although BellSouth expected to correct this measure in October, the coding

required to implement the necessary revisions were more complicated than expected. BellSouth believes that the remaining problems should be resolved with January 2002 data.

Flow Through – BellSouth made the necessary corrections so that the Error Detail report matches the Flow Through Report with October 2001 data. With respect to your request for the status of the issue concerning "flow-through data not included in BST's current flow-through calculations," it is unclear what you are asking. Orders that fall out after a service order is generated should not be considered in calculating flow through, as that term has been defined by the Federal Communications Commission. I will need further clarification from you in order to respond further to this issue.

Duplicate reporting of UNE Loop/Port combinations – The coding problem that was causing UNE Loop/Port combinations to appear in the UNE Other Non-Design category on CLEC PMAP reports was corrected with December 2001 data. This same problem was corrected for CLEC aggregate purposes as reflected on the Monthly State Summary report more than six months ago.

"Unwritten business rules" – It is not clear what specific "problem" you are referring to, and I will need further clarification in order to respond.

BellSouth has attempted to respond completely and fully to each issue raised in your letter to the extent possible. While BellSouth has no objection to sitting down with AT&T to discuss these issues in greater detail, I will need further guidance from you as to which specific issues you would like to discuss, so that I can ensure that the proper subject matter experts are in attendance.

Yours very truly,

Bennett L. Ross

BLR:nvd
Enclosure

cc: Mr. Leon Bowles (w/enclosures)
      Suzanne W. Ockleberry, Esquire (w/ enclosure)

434287

CLEC CCP Proposed Changes for GA Dock #7892-U January 30, 2002

@ *BELL*SOUTH
CHANGE CONTROL PROCESS

CCP12_07.DOC
Version 2.7
December 7, 2001

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VERSION CHANGE HISTORY

This section lists changes made to the baseline Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Change Control website at: **www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.html**

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/19/98		Initial issue.
1.2	02/28/00	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	03/14/00	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	04/12/00	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

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			• 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	04/26/00	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	07/20/00	Section 1	• Added "testing" under process changes
		Section 2	• Clarification provided in "Change Review Participants" description
		Section 4	• Added statement regarding submittal of Change Requests
		Part 2	• Clarification provided for documentation changes for Business Rules • Step 2 – Added email notification • Step 3 – Removed "Cancellation by BellSouth" • Step 3 – Clarification on reject reasons
		Section 5	• Step 3 – Clarification on internal validation activities • Step 4 – Changed cycle time from 5 to 4 business days for developing 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 • Changed 3rd Level Escalation contacts for Types 2-6
		Section 11	• Removed "Cancellation by BellSouth" and "Defect Canceled" definitions • Removed "Cancellation by BellSouth" from Change Request Form and Checklist
		Appendix A	• 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
		All	• Word changes to provide clarification throughout the document.

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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.
2.1	02/09/01	Section 1 – Intro.	• Added new language to the 8th bulleted item – "including User Guides that support OSS systems currently within the scope of CCP" • Added two new bulleted items dealing with the coordination of test agreements, and questions regarding existing documentation.
		Section 3 – Change Control Decision Process	• Added "language" for Types 2, 3, 4 & 5 – "Type xx changes may be managed using the Expedited Feature Process as discussed in Section 4, Part 3." • Type 6 – CLEC Impacting Defects – Added new defect definition
		Section 4 – Part 1 Detail Process Flow	• Added #4 to the Activities – Step 1 • Added additional sentence to Activity #1 – Step 2
		Section 4 – Part 2 – Types 2-5 Process Flow	• Added Activity # 5 – Step 4
		Section 4 – Part 3 – Expedited Feature Process	• Added new Expedited Feature Process definition and flow
		Section 5 – Part 3 – Defect Process	• New Defect title page and definition • Table 5-1 – Step 1 – Activity - #4 – Attach related requirements and specifications documents. These attachments **must** include the following, **if appropriate.** • Table 5-1 – Step 2 – Cycle Time – Replaced old cycle times with: 4 hrs for High Impact, 1 Bus Day for Medium and Low Impact • Table 5-1 – Step 3 – Cycle Time – Replaced old

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			cycle times with: 2 Bus days for High Impact, and 3 Bus Days for Medium and Low Impact • Table 5-1 – Step 3 – Outputs – Added new bullet – "Status provided for High Impact Defects to originator via email within 24 hours" • Table 5-1 – Step 4 – Activity – Added language to Activity #3 - ...and to the CLEC community via email and web posting. • Table 5-1 – Step 4 – Cycle Time – Replaced old cycle times with: 2 Bus Days for High Impact and 4 Bus Days for Medium and Low Impact • Table 5-1 – Step 5 – Activity – Added language to #1 - ...to the CLECs and BellSouth. Added language to Activity #2 - ...defect is implemented. • Table 5-1 – Step 5 – Cycle Time – Replaced old cycle times to reflect: Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium Impact will be implemented within 90-bus days, best effort. Low Impact will be implemented best effort.
		Part 1 – Change Review – Prioritization – Release Package Development and Approval	• Part 1 – Change Review Meeting – 4th paragraph NOTE: Added language to address meetings would occur in March, June, September and December • Part 2 – Change Review Meeting – 4th bullet – Added new bullet - ...BellSouth's estimate of the size and scope of each Change Request • Part 4 – Developing and Approving Release Packages – 1st bulleted item: New language
		Section 7 – Introduction and Retirement of Interfaces	• Retirement of Interfaces – 1st paragraph sentence: New language • Retirement of Versions – New language • Retirement of Versions – Appeal language • New Language for Type 6 High Impact Issues and Medium and Low Impact issues • Types 2-6 Changes – 1st paragraph – new language
		Section 8 – Escalation Process	• Types 2-6 Changes – Contact List for High, Medium and Low Impact escalations
		Section 8 – Dispute Resolution Process	• New definition language
		Appendix A	• Updated CR form & checklist
		Appendix C	• Updated RF1874 User Registration Form
2.1A	02/15/01	All	• Updated various sections of the document to change "language" from defect/expedite to defect and/or expedited features • Changed reference from Section 9.0 to Section 11.0 – Terms and Definitions where appropriate • Minor "cosmetic" changes throughout document
		Section 8	• New 2nd Level Escalation Contacts for Types 2-6
2.2	03/26/01	Section 3	• Replaced "business or software requirements" with

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				"user requirements" throughout definition
		Section 4		• Updated the "Type 1 System Outage" language to reflect the posting of outages via email within 15 minutes of verified outage • Additional language for Step 3 – Reviewing Change Request for Acceptance • Additional language for Step 3 – OBF issues • Added word "preliminary" in Activity #5 of Step 4 – Prepare for Change Review Meeting • Additional language for Step 4 – Prepare for Change Review Meeting – Sizing information • Added activities #4 & #5 under Step 5 – Conduct Change Review Meeting • Updated activity #3 under Step 5 – Conduct Change Review Meeting – Prioritization Meetings • Updated Activities #4, #5, #7, & #8 under Step 8 – Conduct Release Package Meeting including Inputs and Outputs. • Updated the 1st bulleted statement in Step 9 – Create Release Package Notification • Added words "for software changes" in Activity #3 under Step 10 – Release Management and Implementation • Updated Activity #4 in Step 5 – Release Management and Implementation to clarify "associated with expedited features"… "if applicable" • Added the words "submitted" to define the type of defect; the word "ordering" to define the type of enhancement; and the word "interface" to replace the words "product and services" throughout the definition of Expedited Feature – Part 3. • Part 3 – Expedited Feature Process – Step 4 – Internal Change Management Process: Added the word "minor" to better identify the type of release that formerly was identified as "point". Also updated language in Cycle Time to reflect "case by case basis not to exceed 25 days."
		Section 5		• Updated flow-chart – Figure 5-1 – Type 6 Process Flow to reflect agreed upon cycle times. • Updated Title Page and Definition -- Defect Process – 2nd paragraph – Added word "user" to identify type of requirements. • Added additional bullets (#5 and #6) to Step 3 – Type 6 Detail Process Flow – Internal Validation. • Updated cycle times for High, Medium and Low Impact Defects in Step 3 – Internal Validation. • Updated cycle times for High, Medium and Low Impact Defects in Step 4 – Develop and Validate Workaround.
		Section 6		• Updated 1st paragraph in Part 1 – Change Review Meeting to identify categories (pre-order/order, maintenance, manual and documentation, etc.) • Added word "preliminary" to 4th bulleted statement in Part 2 – Change Review Package. • Added new 4th bulleted item under Part 3 –

			Prioritizing Voting Rules.
			• Updated 6th bulleted statement under Part 3 – Prioritizing Voting Rules to reverse the forced ranking to read (1 to N, with 1 being the highest)
			• Added new 7th bulleted item under Part 3 – Prioritizing Voting Rules to add the words "or have little value to the CLEC".
			• Updated the language for the "Introduction of New Interfaces".
		Section 7	• Updated 1st paragraph – 1st sentence under "Retirement of Interfaces".
		Section 8	• Added new 7th bulleted item under the "Escalation Process – Guidelines" to specify the time allowed for a status for Type 6 High Impact and Medium and Low Impact issues.
			• Added new 8th bulleted item under the "Escalation Process – Guidelines" to specify the time allowed for a status for Types 2-5 Expedited Feature Process issues.
			• Removed the entire section under the "Contact List for Escalation – Types 2-6 Changes" since duplication exists under "Guidelines".
		Section 9	• Updated the entire section under "Changes to the Process" with new language.
		Appendix	• Added a new section in the Appendix to define the "Sub-Team Definition and Roles/Responsibilities".
			• Added a new section in the Appendix to give a "Sample" Voting Ballot
2.3	05/18/01	Section 4	• Updated Step 3, Activity #3, first "bulleted" item to identify a "CLEC" training issue.
			• Updated Step 5, Activity #7 to remove reference to 'CRC' status.
			• Updated Step 7, Activity #1 to remove "criteria established by the Internal Change Management Process" language.
		Section 5	• Added separate section (5.2) to document the flow for Documentation Defects.
2.4	07/02/01	Section 4	• Part 2 – Types 2-5 Process Flow – Step 6 – Document Change Review Meeting Results – Cycle Time – 5 days
			• Part 2 – Types 2-5 Process Flow – Step 7 – Internal Change Management Process – Cycle Time – Quarterly
			• Part 2 – Types 2-5 Process Flow – Step 7 – Internal Change Management Process – Activity 2 "Sizing and Sequencing of prioritized change requests…"
			• Part 2 – Types 2-5 Process Flow – Step 8 – Conduct Release Package Meeting – Activity 4
			• Part 2 – Types 2-5 Process Flow – Step 8 – Conduct Release Package Meeting – Cycle Time – Major and Minor Releases
			• Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity

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			4 – Major Releases – Draft User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Final User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Final Specs • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Business Rules • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Notification • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Draft User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Final User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Final EDI Specs • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Business Rules • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Draft User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Final User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Final Specs • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Business Rules • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Adding sub-process activity #5 • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity #5 • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Outputs – Adding four (4) bulleted items
		Section 6	• Part 3 – Expedited Feature Process – Step 3 – Review Change Request for Acceptance • Part 2 – Change Review Package – Adding bulleted statement "Schedule of releases" • Part 4 – Developing and Approving Release Packages – Defining by release when the evaluation and analyzing Candidate Change Requests will take place.
		Section 10	• Part 4 – Developing and Approving Release

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			Packages – Defining what will occur during the Release Package meeting. • Testing Environment – Adding "Language" to define "testing opportunities".
		Terms and Definitions	• Updated Release definitions
		Appendix	• Added Appendix G – Customer Notifications
2.5	07/18/01	Section 9	• Removed "BellSouth" from voting language (associated with CR0411)
		Section 8	• Updated 1st point of contact for escalating Type 1 system outage process.
2.6	09/10/01	Section 4	• Part 2, Step 3, Changing Cycle time to 10 Business Days for Reviewing Change Request for Acceptance. • Part 2, Step 7, Changing Cycle time to 25 Business Days for Conducting Release Package Meeting • Part 3, Step 3, Changing Cycle time to 20 Business Days for Reviewing Change Request for Acceptance.
		Section 5	• Step 3, Changing Cycle time to 1 Business Day for High Impact • Step 4, Changing Cycle time to 1 Business Day for developing Workaround for High Impact Defects • Step 4, Changing Cycle time to 2 Business Days for developing Workaround for Medium Impact Defects • Step 5, Changing Cycle time to 10 Business Days, best effort.
2.7	12/07/01	Section 3	• Type 1 System Outage – Changing "language" to clarify when BellSouth will post the system outage to the web and notify the CLECs via Email.
		Section 4	• Part 1 – Tables 4-1 & 4-2 (Step 2) - Type 1 System Outage – Changing "language" to clarify when BellSouth will post the system outage to the web and notify the CLECs via Email.
		Section 6	• Adding new rules for "Remote Prioritization Voting"
		Section 7	• Adding "language" to better clarify when Software versions are retired.

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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[1], the **development and** 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 [2] of BellSouth's Electronic Interface Applications, associated manual process improvements **and documentation,** 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.~~

Examples of changes to which the ~~The~~ Change Control Process will ~~cover~~ **apply include, but are not limited to,** change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

Interfaces or Gateways
LENS - Local Exchange Navigation System
EDI - Electronic Data Interchange
TAG - Telecommunications Access Gateway
TAFI - Trouble Administration Facilitation Interface
EC-TA - Electronic Communications Trouble Administration Local
CSOTS - CLEC Service Order Tracking System
Linkages
LEO – Local Exchange Ordering
LESOG –
LNP Gateway –

[1] The procedures described in this document apply to all three groupings of the components of "interfaces" as described by the FCC. These include (1) a point of interface (or gateway); (2) any electronic or manual processing links (transmission links) between the interface and BellSouth's internal operations systems (including all necessary back office systems and personnel); and (3) all of the internal operations support systems (or "legacy systems") that BellSouth uses in providing network elements and resale services to competing carriers.
[2] The definition of "CLEC Affecting Changes" is provided in Section 11, Terms and Definitions, below.

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LAUTO –
COG –
SOG –
DOM –
Legacy Systems
SOCS
LMOS
RSAG
ATLAS
LFACS –
CRIS -
CABS –
BIBS -
Tapestry –
Workcenters
LCSC
CWINS

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 interface)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance, **billing,** and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, including User Guides that support OSS systems currently within the scope of CCP)
- Defects
- Expedited Features

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

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- Coordination of test agreements will continue to be supported by the Account Team [Following the completion of the transition process for account team functions described in Carrier Notification Letter SN 91082802, dated January 4, 2002, the proper point of contact will be identified here

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- Questions regarding existing documentation should be handled by the Account Team. . [Following the completion of the transition process for account team functions described in Carrier Notification Letter SN 91082802, dated January 4, 2002, the proper point of contact will be identified here.] However, if documentation needs to be changed for clarification purposes, a defect change request should be submitted through Change Control.

Objectives of the Change Control Process:

- Timely and effective implementation of feature and defect change requests
- 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/markets/lec/ccp_live/index.html

2.0 CHANGE CONTROL ORGANIZATION

Definition

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

Change Review Participants

Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests.

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At all meetings BellSouth's participants shall include subject matter experts familiar with and responsible for the implementation of change requests to [3]the interfaces, linkages and legacy systems impacted by proposed changes. In addition the BellSouth lead manager or project manager associated with any sub-teams, task forces, or user groups that operate in association with the CCP or submit change requests to the CCP shall be present at all monthly status meetings. [4]

The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process Step 7 for Types 2-5 changes).-. **No BellSouth initiated Change Request may be input to BellSouth's internal process at Step 7 without first being subject to the previous steps of this process.**

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

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

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

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

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[3] Where necessary this is to include BellSouth's vendors.
[4] Examples of such groups include but are not limited to the Flow Through Task Force, The Line Sharing/Splitting Collaborative, The UNE-P User Group, The EDI User Group, etc.

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Designated CLEC Co-moderator. (DCCoM)

The DCCoM will function as a co-moderator in presenting and monitoring the progress of pending change requests to/in the BST Internal Change Management Process. The CLECs will appoint two individuals from different non-BellSouth companies to perform this function. These positions may rotate within the participating CLECs as they so desire. Either or both of the DCCoMs will participate in each BST Internal Change Management Process meeting.

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

Definition

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

Type 1 – System Outage Notification [5]

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. BellSouth has 15 minutes to notify the CLECs via e-mail and web posting once the Help Desk has verified the existence of an outage having a duration of 20 minutes or greater. Either BellSouth or a CLEC may initiate the outage report 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. A log of all reported outages (including those not verified or those resolved in less than 20 minutes) will be posted to the CCP website on a monthly basis.

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

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[5] Type 1 – System Outages are not in fact "change requests" but are managed within the CCP for convenience.

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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. **When the mandate does not include a specific implementation date the intervals described below for the implementation of Type 4 and Type 5 changes will apply.** Either BellSouth or a CLEC may initiate the change request. **With approval by the participants** Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

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. **With approval by the participants** Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 4 – BellSouth Initiated Change

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, **Billing,** 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). **The implementation of Type 4 changes will occur within (no later than) 60 weeks from prioritization of the change. Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the various software releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative anticipated work effort required. With approval by the participants** Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 5 – CLEC Initiated Change

Any non-Type 1 change affecting the 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, **Billing** 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

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organizations (which are Type 3 Changes). **The implementation of Type 5 changes will occur within (no later than) 60 weeks from prioritization of the change. Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the various software releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative anticipated work effort required. With approval by the participants** Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 6 – CLEC Impacting Defects

A Type 6 defect request is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

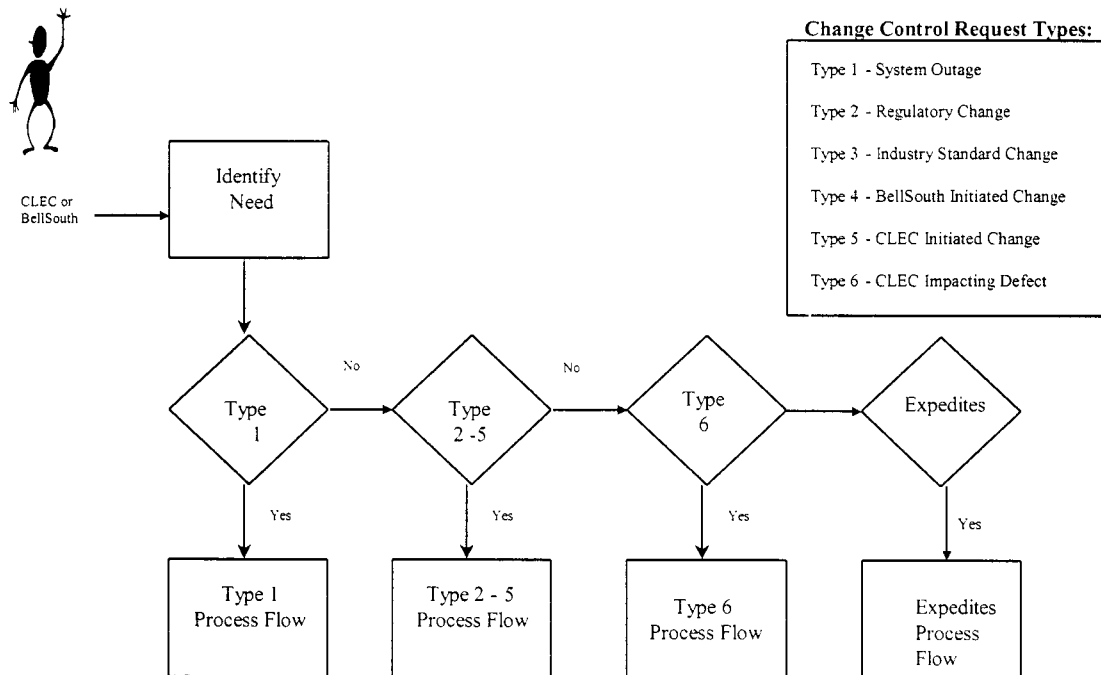Defect Change Requests will have three (3) Impact Levels:

- High Impact – The failure causes impairment of critical system functions and no electronic workaround solution exists. **Correction of high impact defects will occur within 10 business days following the date upon which BellSouth's defect validation process is scheduled to complete**

- Medium Impact – The failure causes impairment of critical system functions, though a workaround solution does exist. **Correction of medium impact defects will occur within 20 business days following the date upon which BellSouth's defect validation process is scheduled to complete. The implementation of a workaround solution does not constitute correction of a medium impact defect.**

- Low Impact – The failure causes inconvenience or annoyance. **This reduces the efficiency of CLEC operations, increases CLEC**

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<u>operating costs, and introduces delay and impacts CLEC customer</u>
<u>service performance. Correction of low impact defects will occur</u>
<u>within 30 business days following the date upon which BellSouth's</u>
<u>defect validation process is scheduled to complete.</u>

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

Figure 3-1 – Change Control Decision Process

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, defects and expedited features will be handled through the Change
Control Process.
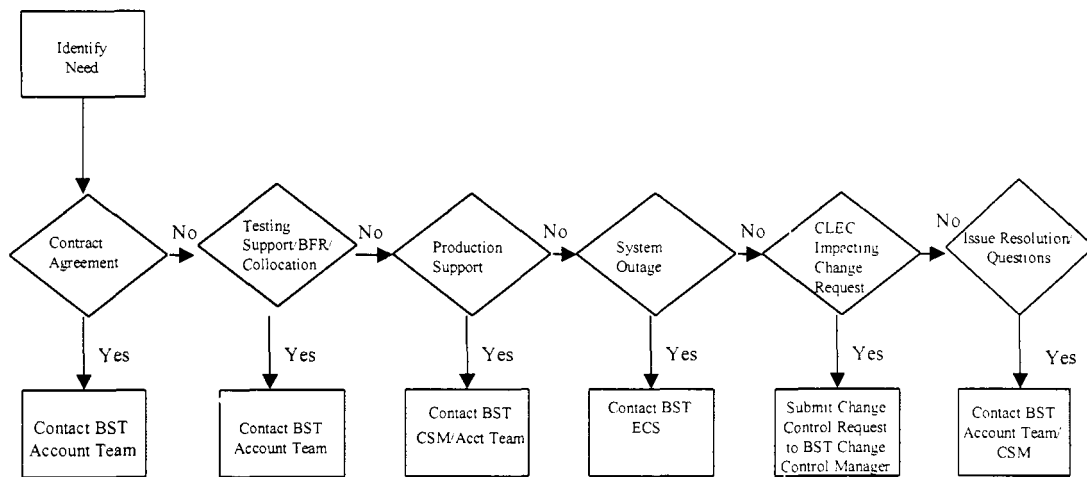
4.0 CHANGE CONTROL PROCESS FLOW

The following three (3) sub-sections describe the process flows for typical Type 1 through Type 5 changes, including expedited features. 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:

Change Control Request Types:

Type 1 - System Outage

Type 2 - Regulatory Change

Type 3 - Industry Standard Change

Type 4 - BellSouth Initiated Change

Type 5 - CLEC Initiated Change

Type 6 - CLEC Impacting Defect

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Part 1: Type 1 System Outage Process Flow

Figure 4-2: 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.
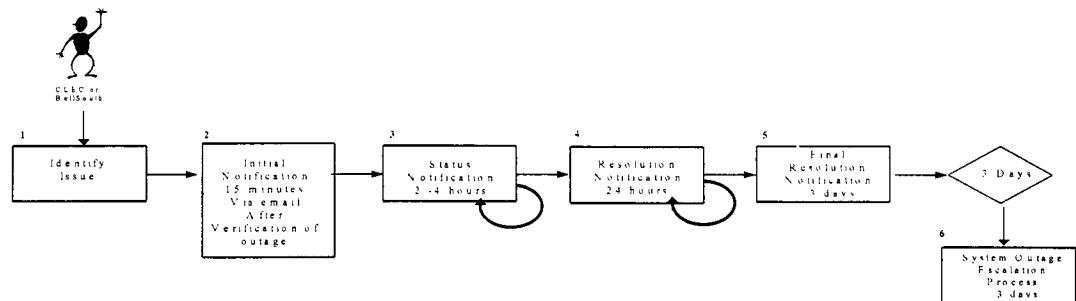
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Table 4-1: Type 1 Cycle Times

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 email and post outage information on the web.

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.

	1	2	3	4	5	6
Process Description	Identify Issue	Initial Notification	Status Notification	Resolution Notification	Final Resolution Notification	Escalation
Cycle Time	N/A	Via email within 15 minutes of the outage verification BST website will be posted with outage information	2-4 Hours (Iterative)	24 Hours (Iterative)	< 3 Days	> 3 Days System Outage Escalation Process

Table 4-2: Type 1 Detail Process Flow

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.

STEP 1		
Accountability:	CLEC Change Control Manager (CCCM), Electronic Communications System Support (ECS)	
Sub-Processes/ Activities	**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 888-426-8030.
		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 **always** provide the CLEC with a trouble ticket number, ~~if requested,~~ to record and track the outage.
	INPUTS	• Issue Characteristics • Call to ECS Helpdesk
	OUTPUTS	• Recorded Outage
	CYCLE TIME	N/A

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STEP 2		
Accountability:	**Electronic Communications System Support (ECS)**	
Sub-Processes/ Activities	**INITIAL NOTIFICATION**	1. ECS will post to the Web an initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An email to the CLECs participating in Change Control will also be distributed. The system ticket number of the outage will be included in the web posting and the email notification.
		2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis.
		3. ECS will continue to work towards the resolution of the problem.
		4. **If a resolution has not been identified, continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web and email to CCP distribution.**
		5. 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.
	INPUTS	• Recorded Outage
	OUTPUTS	• Industry Notification posted on Web • Email to CLECs participating in Change Control • **Resolution information include root cause and fix**
	CYCLE TIME	BellSouth has 15 minutes to notify the CLECs via e-mail and web posting once the Help Desk has verified the existence of an outage having a duration of 20 minutes or greater.

STEP 3		
Accountability:	Electronic Communications System Support (ECS)	
Sub-Processes/ Activities	**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 and email to CCP distribution
	OUTPUTS	• Status Notification posted on web web and email to CCP distribution • Resolution information
	CYCLE TIME	2-4 Hour Intervals

STEP 4		
Accountability:	Electronic Communications System Support (ECS), CLEC Change Control Manager (CCCM)	
Sub-Processes/ Activities	**RESOLUTION NOTIFICATION (Iterative)**	1. The resolution notification is posted to the web and email to CCP distribution. This notification will include root cause and fix descriptions. .
		2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 Defect 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 created, proceed to Step 5 "Final Resolution Notification".

INPUTS	• Status Notification posted on web and email to CCP distribution • Resolution information
OUTPUTS	• Resolution Information posted on web • Final Resolution Information
CYCLE TIME	24 Hours after reporting outage

STEP 5

Accountability:	Electronic Communications System Support (ECS)	
Sub-Processes/ Activities	FINAL RESOLUTION NOTIFICATION	1. The final resolution notification is posted on the web. and email to CCP distribution.
	INPUTS	• Final Resolution Information
	OUTPUTS	• Final Resolution Notification
	CYCLE TIME	< 3 Days

STEP 5a

Accountability:	Electronic Communications System Support (ECS)	
Sub-Processes/ Activities	FINAL RESOLUTION NOTIFICATION	1. The log of all reported outages (including unverified outages and outages resolved in less than 20 minutes) will be posted to the web monthly.
	INPUTS	• Outage Reports • Final Resolution Information
	OUTPUTS	• Comprehensive Outage Log
	CYCLE TIME	3 business days after the close of each month

STEP 6

Accountability:	BellSouth Change Control Manager (BCCM)CLEC Change Control Manager (CCCM), Electronic Communications System Support (ECS)	
Sub-Processes/ Activities	ESCALATION	1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification.
		2. Refer to the Type 1 – Escalation Process documented in Section 8.
	INPUTS	• Information or concern relating to a Type 1 – System Outage
	OUTPUTS	• Documented Escalation • Escalation Response
	CYCLE TIME	> 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)

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[There is an update to this drawing that includes a 30 day "sizing" process that operates in parallel between steps 3 and 4. The CLECs concur with that revision.]

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

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. **No BellSouth initiated Change Request may be input to Step 7 without first being subject to the previous steps of this process.** Steps shown in the table are sequential unless otherwise indicated.

STEP 1		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**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 email to BellSouth.
	INPUTS	• Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A)
	OUTPUTS	• Completed Change Request Form with related documentation
	CYCLE TIME	N/A

STEP 2		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**OPEN CHANGE REQUEST/ VALIDATE CHANGE REQUEST FOR COMPLETENESS**	1. Log Request in Change Request Log.
		2. Send Acknowledgment Notification (Attachment A-3) via email 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
	CYCLE TIME	2-3 Business Days Clarification times would be in addition to cycle time.

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STEP 3		
Accountability:	**BellSouth Change Control Manager (BCCM)**	
Sub-Processes/ Activities	**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 is a 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.
		NOTE: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. BellSouth may determine that a CLEC initiated change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. ~~If requested,~~ ,In **Such cases** BellSouth's reason will be provided in writing on the updated change request and the appropriate BellSouth SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community. ~~The SME must be provided a minimum of two-week advance notice to participate in the upcoming Monthly Status Meeting.~~ ~~**OBF Issues**~~ ~~All change requests 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, and there is agreement between BellSouth and affected CLECs to proceed prior to an OBF resolution, BellSouth will determine if it can support the request.~~

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INPUTS	• New Change Request • Validated Change Request • Clarification Notification (if required)
OUTPUTS	• Pending Change Request • Clarification Notification (if applicable) • Cancellation Notification (if applicable) • CR status updated on web
CYCLE TIME	10 Business Days[6]

NOTE: There is a 30 business day process operating in parallel between steps 3 and 4 of this process in which BellSouth competes its preliminary feature sizing model on pending change requests.

STEP 4		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	PREPARE FOR CHANGE REVIEW MEETING	NOTE: These activities take place to prepare for Change Review meetings when prioritization takes place. (BCCM) 1. Prepare an agenda.
		(BCCM) 2. Make meeting preparations.
		(BCCM) 3. Update Change Request Log with current status for new and existing Change Requests.
		(BCCM) 4. Prepare and post Change Request Log to web.
		(BCCM) 5. Provide preliminary size feature sizing model and scope information on each pending change request and all future releases to CLECs including estimated programming, testing, and administrative hours. This sizing is expressed in "units" with a unit being equal to 100 release cycle hours.
		(CCCM) 1. Analyze Pending Change Requests
		(CCCM) 2. Determine priorities for change requests and establish "Desired/Want" dates.
		(CCCM) 3. Create draft Priority List to prepare for Change Review Meeting.
		The sizing information provided with the Change Review Meeting package is a preliminary estimate of the work effort. After prioritization, each interface is assessed in depth to determine the scope of the change request. Based on the assessment, an adjustment in the sizing may be required. CLECs will be notified of release capacity units and units assigned per CR.

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[6] FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

INPUTS	- Pending Change Request Notifications - Project Release Status (Step 10) - Change Request Log **BST Preliminary feature sizing model and full release capacity.**
OUTPUTS	- Change Request Log - CLEC Draft Priority List **BST** Preliminary ~~size~~ **feature sizing model** and scope on each Pending change request **full release capacity of each future release**.
CYCLE TIME	5-7 Business Days

STEP 5		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	CONDUCT CHANGE REVIEW MEETING	**MONTHLY STATUS MEETINGS** 1. Communicate regulatory mandates.
		2. Review status of pending/approved Change Requests (including defects and expedited features) at monthly status meeting.
		3. Review current Release Management statuses.
		4. Review issues and action items and assign owners. 5. Present new change requests submitted since previous Monthly Status Meeting.
		PRIORITIZATION MEETINGS (Held quarterly in March, June, September and December) 1. Follow Steps 1-3 from Monthly Status Meetings.
		2. Initiators present Change Requests.
		3. BellSouth presents the preliminary ~~size~~ **sizing** model (units and scope of each change request. **See Appendix H for information to be provided.** BellSouth presents the number of major releases and dates targeted for the **remainder of the current and next calendar year.** ~~next 12 months.~~ **BellSouth presents the total capacity (units) of each release and the capacity available (units) for the implementation of the change requests.**
		4. Discuss impacts.

		5.	Prioritize Change Requests.

6.Develop final Candidate Requests list of Pending Change Requests by category, "Need by Dates" or and **by Release number based on Release capacity** and prioritized Change Requests.

All release capacity not required to implement Type 2, Type 3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence.

7.6. Update Change Request Log to "RC" for Candidate Request List, "C" for Canceled, "P" for Pending, as appropriate.

8.7. Review issues and action items and assign owners.

INPUTS	• Change Request Log
	• CLEC Draft Priority List
	• Desired/Want dates
	• Impact analysis
	• Preliminary size feature sizing model and scope on each pending change request and **capacity of** future release
OUTPUTS	• Meeting minutes
	• Updated Change Request Log
	• Candidate Change Request List
	• **Assignment of Candidate Change Requests to future releases.**
	• Issues and Action Items (if required)
CYCLE TIME	1 Business Day (or as needed based on volume) Meeting Day

STEP 6		
Accountability:	**BellSouth Change Control Manager (BCCM)**	
Sub-Processes/ Activities	DOCUMENT CHANGE REVIEW MEETING RESULTS	1. Prepare and distribute outputs from Step 5.

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INPUTS	• Change Request Log
	• Final Candidate Request List
	• **Prioritized Assignments to Future Releases**
OUTPUTS	• Updated Change Request Log
	• Web posting of meeting output
CYCLE TIME	5 Business Days

STEP 7	
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM) , Designated CLEC Co-moderator (DCCoM)
Sub-Processes/ Activities	**INTERNAL CHANGE MANAGEMENT PROCESS**	1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Candidate Change Requests. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. No BellSouth initiated Change Request may be input to Step 7 without first being subject to Step 5 of this process. 3. The DCCoM shall participate with the BCCM in BellSouth's internal process as co-moderator. 4. 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 the next release and all items have been targeted to a future release package. 5. All release capacity not required to implement Type 2, Type 3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence. 6. The implementation of Type 4 and Type 5 changes will occur within (no later than) 60 weeks from prioritization of the change. Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the various software releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative anticipated work effort required. .
	INPUTS	• Candidate Change Request List with agreed upon "Need by Dates" • Change Request Log
	OUTPUTS	• BellSouth's Proposed Release Package • CLEC Analysis
	CYCLE TIME	25 Business Days[7]

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[7] FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

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STEP 8		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	<u>CONDUCT RELEASE PACKAGE MEETING</u>	1. Prepare Agenda
		2. Make meeting preparations.
		3. Evaluate proposed release schedule.
		4. One CCP master prioritization list will be maintained. One month prior to each Change Review Meeting, CLEC/BST will determine the process for prioritizing change requests. Options include: • Prioritize all change requests (new pending and non-scheduled) • Prioritize only the new pending requests. An average ranking will be calculated and incorporated into the CCP master prioritization list.
		5. Based on BST/CLEC consensus, create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the requests changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package.
		6. Identify Release Management Project Manager,~~if possible~~.
		7. Establish date for initial Release Management Project Meeting for the next new release.
		8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".

INPUTS	• BellSouth's Proposed Release Package • BellSouth's Release Schedule • Change Request Log • CLEC Analysis
OUTPUTS	• Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • Date for initial Release Management Project Meeting for next new release.
CYCLE TIME	1 Business Day Major Release Meeting held 36 weeks prior to production. Minor Release Meeting held 19 weeks prior to production (if applicable).

STEP 9

Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**CREATE RELEASE PACKAGE NOTIFICATION**	1. Develop and distribute Release Notification Package via web.
	INPUTS	• Approved Release Package
	OUTPUTS	• Release Package Notification
	CYCLE TIME	2 Business Days after Release Package Meeting

STEP 10

Accountability:	BellSouth Change Control Manager (BCCM) and Project Managers from each participating company	
Sub-Processes/ Activities	**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 **and CCCM** for inclusion in Monthly Status Meetings.
		3. Software Release Notifications will be provided 30 calendar days or more in advance of the implementation date.
		4. BellSouth User Requirements for software changes will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined.

Production ~~Major~~ Releases
- Draft User Requirements for major software releases will be provided to the CLECs at least 36 weeks prior to production.
- Final User Requirements for major software releases will be provided to the CLECs at least 34 weeks prior to production. **The estimated units of effort will be provided**
- Final **code-able** specifications (EDI specs and TAG API) for major software releases will be provided to the CLECs at least 10 weeks prior to production.
- The business rules associated with major software releases will be provided to the CLECs at least 8 weeks prior to production.

Industry Releases
- Notification for the implementation of an Industry release will be provided at least 42 weeks prior to production.
- Draft User requirements for the implementation of an Industry Release will be provided to CLECs at least 40 weeks prior to production.
- Final User requirements for the implementation of an Industry release will be provided to CLECs at least 35 weeks prior to production. **The estimated units of effort will be provided.**

- Final specifications **code-able** (EDI specs and TAG API) for the implementation of an Industry release will be provided to the CLECs at least 10 weeks prior to production.
- Business rules associated with the implementation of an Industry release will be provided to CLECS at least 8 weeks prior to production.

~~Minor Releases~~
- ~~Draft User requirements for the implementation of a Minor release will be provided to CLECs at least 19 weeks prior to production (if applicable).~~
- ~~Final user requirements for the implementation of a Minor release will be provided to CLECs at least 18 weeks prior to production (if applicable).~~
- ~~Final specifications (EDI specs and TAG API) for minor software releases will be provided to the CLECs at least 5 weeks prior to production (if applicable).~~
- ~~The business rules associated with minor releases will be provided to the CLECs at least 5 weeks prior to production (if applicable).~~

5. BellSouth Documentation changes, including business rule changes, will be provided.
   - All non-system impacting changes to BellSouth business rule documentation will be provided to CLECs at least 30 calendar days in advance of the effective date (excluding expedites/defects).

	6.	Once a Change Request 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
	•	Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc.
	•	Implemented Change Request
	•	Draft User Requirements
	•	Final User Requirements
	•	Documentation Changes
	•	Final Specifications
CYCLE TIME	Ongoing	

Part 3: Expedited Feature Process

Definition

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 (OSSs) 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 submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact

- An ~~ordering~~ enhancement to an existing interface where the CLEC/BellSouth **and the CCP participants** ha~~ves~~ <u>ve</u> determined should be expedited due to impact

Re-Classified Defects
When a submitted defect is re-classified as a feature, the CLEC/BellSouth will be notified by Change Control in the defect validation. The CLEC will have the ability to ask BellSouth to expedite the re-classified 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 Expedited Feature process using agreed upon intervals.

~~Ordering~~ enhancement to an existing interface
A CLEC/BellSouth will also have the ability to submit a Type 2-5 change request as an expedited feature request for an ~~ordering~~ enhancement to an existing interface where the functionality does not currently exist in BellSouth's offered interface.

For both re-classified defects and enhancements to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an ~~ordering~~ enhancement to an existing interface

- Will follow the Expedited Feature Process flow described below which is based on 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, <u>or</u> next, ~~or minor~~ release, best effort.

- **<u>Is granted expedited status by the consensus of the CCP participants at the next monthly status meeting. This consensus will be obtained in parallel with the activities within steps 3 and 4 and will only impact the process in those cases where the CCP participants do not concur.</u>**

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Figure 4-4: Process Flow for Types 2-5 Expedited Feature Process

<u>The flow chart below will be modified to include an additional step in parallel between the existing step 3 and 4 during which the consensus of the CCP participants is obtained at the CCP monthly status meeting following BellSouth's validation of the expedited change request.</u>

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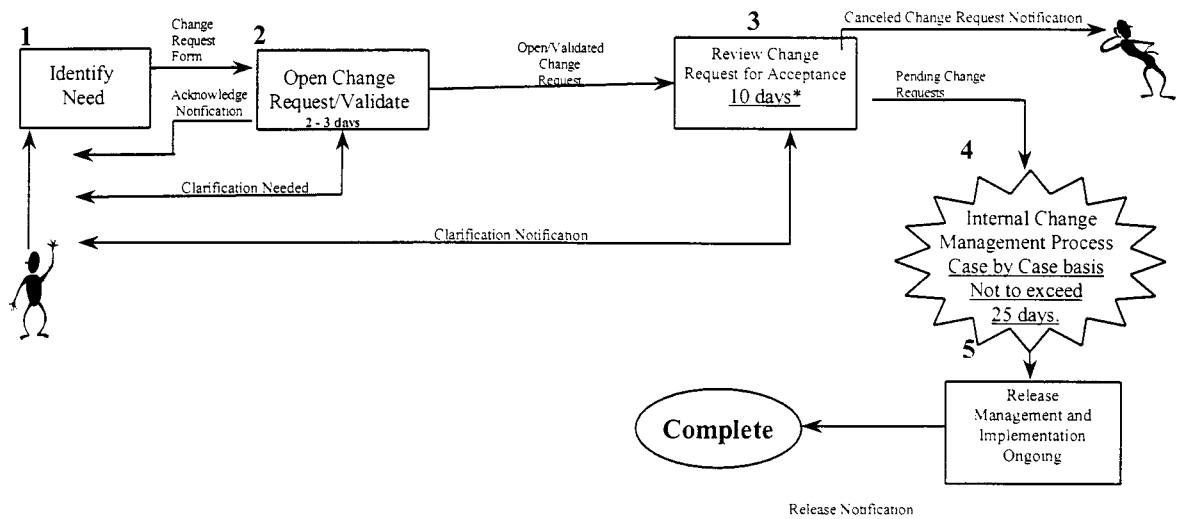
* FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

Table 4-3: Types 2-5 Expedited Feature Detail Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Expedited Feature process. Steps shown in the table are sequential unless otherwise indicated.

STEP 1		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**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 email to BellSouth.
	INPUTS	• Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A)
	OUTPUTS	• Completed Change Request Form with related documentation
	CYCLE TIME	N/A

STEP 2		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**OPEN CHANGE REQUEST/ VALIDATE CHANGE REQUEST FOR COMPLETENESS**	1. Log Request in Change Request Log.
		3.7. Send Acknowledgment Notification (Attachment A-3) via email to originator.
		4.8. Establish request status ('N' for New Request)
		5.9. Review change request for mandatory fields using the Change Request Form Checklist.
		6.10. Verify Change Request specifications and related information exists.
		7.11. Send Clarification Notification via email to the originator (Attachment A-4) if needed.
		8.12. 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
	CYCLE TIME	1 Business Day Clarification times would be in addition to cycle time.

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STEP 3		
Accountability:	**BellSouth Change Control Manager (BCCM)**	
Sub-Processes/ Activities	<u>REVIEW CHANGE REQUEST FOR ACCEPTANCE</u>	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, 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. BellSouth may determine that a CLEC initiated expedited change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. **In such cases** BellSouth's reason will be provided in writing on the updated change request and ~~if requested~~, the appropriate BellSouth SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community. ~~The SME must be provided a minimum of two-week advance notice to participate in the upcoming Monthly Status Meeting.~~

INPUTS	• 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
CYCLE TIME	10 Business Days[8]

STEP 3A

Accountability:	CCP Participants	
Sub-Processes/ Activities	PROVIDE CONSENSUS OF EXPEDITE	1. Change requests validated in Step 2 above shall be considered for expedited status by the CCP participants at the next Monthly Status Meeting. Requests granted expedited status by the consensus of the participants will continue through Step 4 and 5 to implementation. If the request is not granted expedited status it will exit this process and enter the standard Types 2-5 flow, Step 4.
		2. If request does not receive expedited feature status, it will exit this process and enter the standard Types 2-5 flow, Step 4.
		3. This step will occur in parallel to the activities in Steps 3 and 4 and will only impact the process in those cases where the CCP participants do not concur.
	INPUTS	• New Change Request
		• Validated Change Request
	OUTPUTS	• Validated Expedited Change Request
		• Clarification Notification (if required)
		• Cancellation Notification (if required)
		• CR status updated on web
	CYCLE TIME	Next Monthly Status Meeting Following Validation in Step 2.

STEP 4

Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	INTERNAL CHANGE	1.2. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature

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[8] FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

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	MANAGEMENT PROCESS	Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. **The DCCoM shall participate with the BCCM in BellSouth's internal process as co-moderator.** Expedited Features will be implemented in the current, _or_ -next release, ~~or minor release~~, best effort.
	INPUTS	• Change Request Log
	OUTPUTS	• Release Date for Expedited Feature
	CYCLE TIME	Case by Case basis – Not to exceed 25 days

STEP 5		
Accountability:	BellSouth Change Control Manager (BCCM) and Project Managers from each participating company	
Sub-Processes/ Activities	**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 User 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 associated with expedited features, will be provided, if applicable.
		5. Once a Change Request 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 • Documentation Changes
	CYCLE TIME	Ongoing

5.0 DEFECT PROCESS

Definition

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 email and web posting.

A Type 6 defect request is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature (See Documentation Defect – Sub section 5-2). Type 6 validated defects may not be managed using the Expedited Feature Process discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels (excluding documentation defects):

- **High Impact**

The failure causes impairment of critical system functions and no electronic workaround solution exists. **Correction of high impact defects will occur within 10 business days following the date upon which BellSouth's defect validation process is scheduled to complete.**

- **Medium Impact**

The failure causes impairment of critical system functions, though a workaround solution does exist. **Correction of medium impact defects will occur within 20 business days following the date upon which BellSouth's defect validation process is scheduled to complete. The implementation of a workaround solution does not constitute correction of a medium impact defect.**

- **Low Impact**

The failure causes inconvenience or annoyance. **This reduces the efficiency of CLEC operations, increases CLEC operating costs, introduces delay and impacts CLEC customer service performance. Correction of low impact defects will occur within 30 business days following the date upon which BellSouth's defect validation process is scheduled to complete.**

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Figure 5-1: Type 6 Process Flow
        Validation and Resolution of a Type 6 Change – CLEC impacting Defect (excluding documentation)
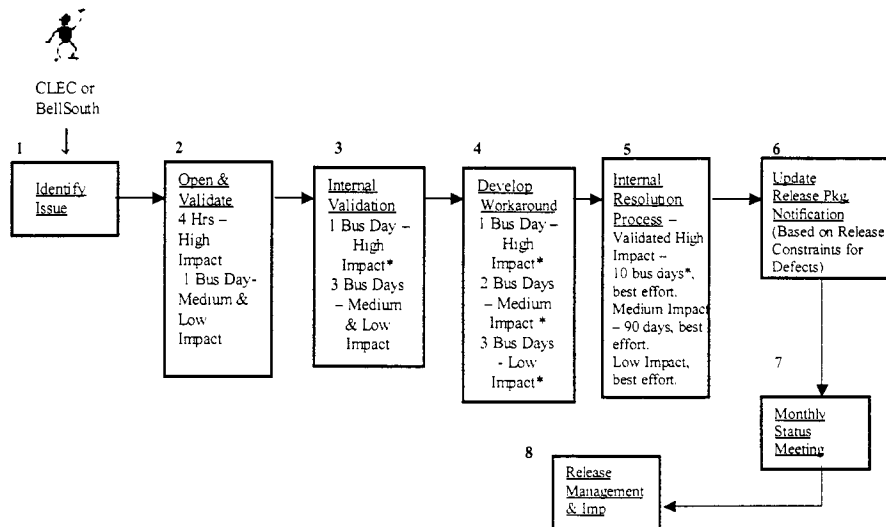
NOTE: The intervals in the boxes above match the intervals in the tables to follow for High, Medium, and Low Impact defect change requests. [NOTE: THE CLEC PROPOSED INTERVALS FOR STEP 5 ARE NOT REFLECTED IN THE BOX ABOVE. PLEASE SEE STEP 5, OR THE NARRATIVE ABOVE, IN THE TABLE BELOW FOR THE CLEC POSITION.]

STEP 2		
Accountability:	**BellSouth Change Control Manager (BCCM)**	
Sub-Processes/ Activities	**OPEN & VALIDATE DEFECT 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.
		5. Verify specifications and related information exist.
		6. Send Clarification Notification via email to the originator if needed.
		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.
	INPUTS	• Completed Change Request Form (with related documentation if necessary)
	OUTPUTS	• New Defect • Acknowledgment Notification • Clarification Notification (if required)
	CYCLE TIME	4 Hours – High Impact 1 Business Day – Medium & Low Impact (Time to be calculated from time of receipt with a cutoff time of 4:00 pm Eastern Time)

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Issued Date: December 07, 2001

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STEP 3		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**INTERNAL VALIDATION**	1. Validate that it is a defect.
		2. Perform internal defect analysis.
		3. Determine status of request: • If change already exists or CLEC training issue, forward Cancellation Notification 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. • 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 "V" for Validated Defect and indicate appropriate Impact Level. • If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. • If the process is operating as specified in the baseline requirements and published business rules, the BCCM will communicate the results via email to the originator to discuss/determine the next step(s). • If issue is re-classified as a feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3)
		NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions. Defect Notification will be provided to CLEC community via email and web posting.

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INPUTS	• New Defect
OUTPUTS	• Validated Defect • Defect notification to CLEC community via email and web posting • Clarification Notification (if required) • Cancellation Notification (if required) • Status provided for High Impact Defects to originator via email within 24 hours
CYCLE TIME	1 Business Day – High Impact[9] (If BellSouth cannot complete internal validation of a High Impact defect within 1 bus day, BST will communicate the reason and expected time period in which the defect validation can occur to both the originator and the CLECs) 3 Business Days – Medium and Low Impact

STEP 4

Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	DEVELOP & 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 CLEC community via email and web posting.
		4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call.
		If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via email and web posting.

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[9] FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

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INPUTS	• Validated Defect • Clarification Notification (if required)
OUTPUTS	• Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • Email and web posting of workaround
CYCLE TIME	1 Business Day – High Impact[10] 2 Business Days – Medium Impact[11] 3 Business Days – Low Impact

STEP 5		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	INTERNAL RESOLUTION PROCESS	1. Schedule and evaluate Defects 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 defect is implemented.

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INPUTS	• CLEC/BST input
OUTPUTS	• Defect Release Schedule
CYCLE TIME	• Validated High Impact Defects will be implemented within a 10 business day range, best effort[12]. (BST will be required to have daily discussions with the originating CLEC and provide daily updates to other impacted CLECs. If BST is unable to correct a high impact defect in 10 business days, it must notify the designated CLEC and notify all impacted parties) • Validated Medium Impact Defects will be implemented within 9020 business days, best effort. (BST will be required to have weekly discussions with the originating CLEC and provide weekly updates to other impacted CLECS. If BST is unable to correct a Medium Impact defect in 20 business days, it must notify the designated CLEC and notify all impacted parties.) • Low Impact Defects will be implemented, within 30 business days, best effort. (If BST is unable to correct a Low Impact defect in 30 business days, it must notify the designated CLEC and notify all impacted parties.) • ~~Validated High Impact Defects will be implemented within a 10 business day range, best effort[13]. (BST will be required to have daily discussions with the originating CLEC and provide daily updates to other impacted CLECs. If BST is unable to correct a high impact defect in 10 bus days, it must notify the designated CLEC and notify all impacted parties)~~ • ~~Medium Impact Defects will be implemented within 90 business days, best effort.~~ • ~~Low Impact Defects will be implemented, best effort.~~

STEP 6	
Accountability:	BellSouth Change Control Manager (BCCM)

Sub-Processes/ Activities	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 published in a timely manner, based on the release constraints associated with the

[12] FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP
[13] FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

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		defect. **NOTE:** In the event correction of the defect may potentially cause the CLECs to perform coding or business procedure changes BellSouth will provide notification and appropriate documentation with the release notification.
	INPUTS	• Defect Information
	OUTPUTS	• Updated Release Package Notification • Scheduled Change Request • Documentation of potential CLEC coding/process changes
	CYCLE TIME	Based on release constraints for defects (may be less than 30 days)

STEP 7

Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**MONTHLY STATUS MEETING**	1. Provide status of defect.
		2. Solicit CLEC/BST input.
		3. Update Defect information as needed.
	INPUTS	• Defects Received • Change Request Log • Defect Analysis • Workaround (if applicable)
	OUTPUTS	• Updated status • Updated Change Request Log • Meeting minutes
	CYCLE TIME	Monthly or when status changes, whichever occurs first.

STEP 8

Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**RELEASE MANAGEMENT AND IMPLEMENTATION**	The following release management activities will pertain to Type 6 changes: 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings.
		2. Once a defect is implemented in a release, the status will be changed to "I" for Change Implemented.

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INPUTS	• Approved Release Package Notification
OUTPUTS	• Project Release status • Implementation Date • Implemented Change Request
CYCLE TIME	Ongoing

Table 5-2: Type 6 Detail Process Flow – Documentation Defects

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

STEP 1		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	**IDENTIFY NEED**	1. Identify Documentation Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6.
		3. Include description of business need and details of business impact.
		4. Attach related requirements and specification documents, if appropriate.
		5. Appropriate CCCM/BCCM submits Change Request Form and related information via email to BellSouth Change Management Team.
	INPUTS	• Type 6 Change Request
	OUTPUTS	• Completed Change Request Form (with related documentation if necessary)
	CYCLE TIME	N/A

STEP 2	
Accountability:	BellSouth Change Control Manager (BCCM)

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Sub-Processes/ Activities	OPEN & VALIDATE DEFECT 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.
		5. Verify specifications and related information exists
	INPUTS	• Completed Change Request Form (with related documentation if necessary)
	OUTPUTS	• New Documentation Defect • Acknowledgment Notification • Clarification Notification (if required)
	CYCLE TIME	1 Business Day

STEP 3		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	INTERNAL VALIDATION	1. Validate that it is a documentation defect. 2. Perform internal defect analysis.
		3. 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. • Send Clarification Notification via email if needed and update status to "PC" for Pending Clarification. • If Change Request Clarification Notification not received back from CLEC, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to "V" for Validated Defect and indicate appropriate Impact Level. • If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. • If the documentation is correct, the BCCM will communicate the results via email to the originator to discuss/determine the next step(s).
		NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions. Defect Notifications will be provided to CLEC community via

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email and web posting.

INPUTS	• New Documentation Defect
OUTPUTS	• Validated Documentation Defect • Defect notification to CLEC community via email and web posting • Clarification Notification (if required) • Cancellation Notification (if required)
CYCLE TIME	3 Business Days

STEP 4

Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	DEVELOP & PROVIDE CARRIER NOTIFICATION "SUMMARY OF CHANGES"	1. BellSouth prepares and validates the corrected documentation.
		2. Carrier Notification "Summary of Changes" is developed.
		3. Change Request status changed to "S" for scheduled.
		4. Carrier Notification "Summary of Changes" is sent to BCCM via email for distribution to CLECs.
		If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via email and web posting.
	INPUTS	• Validated Documentation Defect • Clarification Notification (if required)
	OUTPUTS	• Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • Email of "Summary of Changes" notification
	CYCLE TIME	4 Business Days

STEP 5

Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	CARRIER NOTIFICATION LETTER	1. BellSouth will develop an "official" Carrier Notification Letter.
		2. Carrier Notification Letter is posted to the web.

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INPUTS	• Carrier Notification "Summary of Changes"
OUTPUTS	• Carrier Notification Letter posted on web
CYCLE TIME	10 Business Days

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT & APPROVAL

Part 1: Change Review Meeting

Definition

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 CLECs. Meetings will be structured according to category (pre-order/order, maintenance, manual and documentation, etc.). Prioritization meetings will be held quarterly.

During the Change Review Meeting, each originator of a Change Request will be allowed five (5) 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 business days prior to the Change Review Meeting. **Change Requests must be accepted and in "Pending" status at least 30 business days in advance of the distribution of the Change Review Package to ~~provide~~assure completion of the preliminary feature sizing model. Other Change Requests, placed in pending status after the 30 business days cutoff will also be available for prioritization but may not have the preliminary feature sizing model information..** ~~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 occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2: Change Review Package

Definition

The Change Review Package will be distributed to all participants 5-7 business days prior to the Change Review Meeting. The package will include the following:

- Meeting Agenda

- Agenda

- Change Request Log (List of Change Requests to be reviewed)

- BellSouth's preliminary **feature sizing model** ~~estimate of the size~~ and scope of each **future release and each** Change Request **(see Appendix H for information to be provided)**

- BellSouth's preliminary units estimate of: 1) CLEC feature release capacity available and 2) assigned capacity to known CLEC features
  =

- Schedule of Releases **and estimated size (i.e. total units and units available) of each.**
  =

- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)

- Status Reports from each of the active Release Management Project Teams

Part 3: Prioritizing Change Requests

Definition

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 (LOI) on file with the BellSouth Change Control Management Team to participate in the voting process.

- One vote per CLEC, per category.

- No proxy voting

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- Types 3, 4 and 5 change requests will be prioritized (non-expedites)

- 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.

- Forced Ranking (1 to N, with 1 being the highest) will be used

- Votes will be tallied to determine order of ranking

- Changes will be ranked by category

- Manual processes and documentation will be prioritized separately; however they will need to be synchronized with the electronic interface changes

- In cases of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

REMOTE PRIORITIZATION VOTING RULES

- The ranking sheet, which lists the change requests to be prioritized, will be provided to the CLEC community via email 5-7 business days prior to the Change Review Meeting.

- Presentation of each change request to be prioritized will occur in the morning portion of the meeting.

- Change Management will verify which participants will be submitting their ranking sheets.

- CLECs must be present at the meeting (either via conference bridge or in person) to participate in the prioritization.

- Ranking sheets must be emailed to Change Control by Noon Eastern the day of prioritization meeting:

  Change.Control@bridge.bellsouth.com
  Fax Number: 205-321-5160 (if email is not working)

- Results will be tallied during the lunch break.

- The results of the ranking will be presented in the afternoon portion of the meeting.

- In case of a tie, the affected Changes will be re-ranked. Ranking sheets must be emailed to Change Control within one (1) hour after notification of a tie.

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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	CLEC 2	CLEC 3	Total
E1	3	1	6	10
E2	3	5	1	9 (#2)
E3	1	6	5	12
E4	4	3	3	10
E5	2	2	3	7 (#1)
E6	6	3	2	11

Part 4: Developing and Approving Release Packages

Definition

Subsequent **Prior to and in conjunction with** 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 as follows:

- **Production** Major Release – 36 weeks prior to production
- Minor Release – 19 weeks prior to production (if applicable)

Sizing and sequencing of change requests will be accomplished at the Prioritization meeting. CLECs may take into account the size and scope when prioritizing items.

During the Release Package Meeting, BellSouth will present its proposed release package for the next **and any necessary additional** releases.

- **BellSouth will develop several variations of release packages to include all prioritized requests.**
- **All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.**

All release capacity not required to implement Type 2, Type 3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence.

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CLEC/BST consensus will be used to create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CR's). BellSouth will evaluate and determine the impacts of the requested changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package.

Part 5: Release Capacity Forecasting, Allocation, and Reporting

Forecast and Planning Information: In order to facilitate joint planning for long term development between BellSouth and CLECs and production support capacity plans, two OSS development forecasts and specifications will be shared. Each quarter, BellSouth will provide a release capacity forecast covering the remainder of the current calendar year and the following calendar year including high level estimates of when BellSouth intends to release, upgrade or retire its various operational support systems. At the same time and for the same period of time BellSouth will provide an outlook with high-level description of the items to be included in each upgrade release. Included in this outlook will be the size in units of the release capacity and the size in units of the capacity remaining within the release.

For Type 3 Industry changes, BellSouth will provide the preliminary feature sizing model at the beginning of the calendar year. The remaining annual capacity will be allocated according for the defined categories per the Change Control Process document.

All release capacity not required to implement Type 2, Type 3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence.

Pre-Release Capacity

BellSouth will provide preliminary unit measurement estimates accompanying each change request that can be used by the CLECs during prioritization. BellSouth will provide the total number of units available for a specific release to be utilized as a tool for prioritization. Total number of units will be provided as follows:

Total Release Units
- Units required to perform release maintenance
- Units required to implement public switched network mandates such as NPA overlays and Number Pooling
- Units required to implement Type 6 Change Requests
- Units required to implement Type 2 Change Requests
- Units required to implement Type 3 Change Requests

= Remaining Units Available for the prioritization and implementation
of Type 4 and Type 5 Change Requests

Monitoring and Reporting Post-Release Capacity Utilization

BellSouth will track the capacity per the above categories and provide a Year-To-Date (YTD) percent capacity used. This report will be provided at CCP on a quarterly basis, beginning with calendar year 2002. Appendix I provides the report format.

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

Definition

BellSouth will introduce **the development and implementation of** 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. 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 **and proactively seek, consider and respond to CLEC comments and requests for enhancements to the specifications.**~~.~~ 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 **all subsequently** requested changes will be managed by this process.

Retirement of Interfaces

Definition

As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before

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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

Definition

When software release versions of a specific interface (e.g., TAG Application Program Interface Version n.n.n) are retired/expired, BellSouth will give CLECs a 180~~120~~ day advance notification. The Carrier Notification that announces the retirement/expiration of specific interface release versions will also identify when BST will cease CLEC testing of those expiring release versions. For example, BellSouth's TAG, an application interface, has the ability of supporting multiple software release versions per industry map. Therefore, the retirement/expiration of a software release version does not necessarily expire an industry map, but instead only those specific interface release versions. Example of a retirement of a software versions of an interface: On March 8, 2001, BellSouth provided a Carrier Notification Letter that stated effective August 10, 2001, BellSouth would no longer support TAG API versions: 7.1.0.7, 7.5.0.10, and 2.0.0.11.

A CLEC may respond to Change Control with its desire to extend a retirement date. The CLEC must explain why the scheduled retirement date is not acceptable by providing the impact to its business.

BST will maintain a ongoing matrix of current and retired software versions in the monthly change control meeting materials.

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8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.

- Escalations can involve issues related to the Change Control process itself.

- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (i.e., communication timelines) have occurred per the Change Control agreement.

- Three (3) levels of escalation will be used.

- For Type 1 issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround for each cycle of escalation

- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five (5) day turnaround for each cycle of escalation (excludes expedites)

- For Type 6 High Impact Issues, the escalation process is agreed to allow BellSouth a one (1) 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 2-5 day turnaround to provide a status for each cycle of escalation.

- For Types 2-5 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.

- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control email unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation: ECS Group – Type 1 Changes

NOTE: 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	Byron Franklin Manager – EC Support Group Interconnection Operations	205-733-5400	1-800-862-0399 PIN 17264913	Byron.Franklin@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Lynn Smith Operations Assistant Vice President Interconnection Operations	205-714-0010	N/A	Lsmith12@imcingular.com Lynn.A.Smith@bridge.bellsouth.com

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

Escalation Cycle for Types 2-6 Change Requests

Guidelines

- Item must be formally escalated as an email sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control email.

- Subject of email must be CLEC (CLEC Name) ESCALATION –CR#, if applicable, Level of Escalation, unless it is proprietary.

- Content of email must include:
    o Definition and escalation of item
    o History of item
    o Reason for escalation
    o Desired outcome of CLEC

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- 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 Email ID.

- For escalation Level 2, forward original email and include any additional information including the reason that the matter could not be resolved at Level 1.

- For escalation Level 3, forward original email 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 acknowledgment of receipt within four (4) hours and begin the escalation process through Level of escalation.

- **BellSouth will provide status daily to CLEC with minimum of expected date and time of BST response to escalation**

- The escalating CLEC should respond to BellSouth within five (5) days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.

- If the BellSouth position suggest 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 one (1) business day of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.

- If unsatisfied with outcome, either party can seek appropriate relief.

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Contact List for Escalation: Types 2 – 6 Changes[BellSouth must keep current in the official version & on web site.]

NOTE: Escalations should be made according to the following list:

Escalation Level	Name and Title	Office Number	Email Address
1st Level	**Valerie Cottingham** Director Change Control Process	205-321-2168	Valerie.Cottingham@bridge.bellsouth.com
2nd Level	**Dennis Davis** OAVP (Encore Solution Delivery, Test Bed, User Requirements, CCP)	205-977-1103	Dennis.L.Davis@bridge.bellsouth.com
	Allan Tarr OAVP (Business Rules/Operations Issues)	404-927-7372	Allan.F.Tarr@bridge.bellsouth.com
	Suzie Lavett OAVP (TAG/LENS)	205-977-2876	Suzie.H.Lavett@bridge.bellsouth.com
	Audrey Thomas OAVP (EDI)	404-927-7886	Audrey.Thomas@bridge.bellsouth.com
	Al Bolden OAVP (LNP)	404-927-7011	Al.Bolden2@bridge.bellsouth.com
3rd Level	**Martha-Sue Blythe** Senior Director (for Systems Issues)	404-927-7505	Marthasue.Blythe@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	Dee.Freeman2@bridge.bellsouth.com

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Dispute Resolution Process

Guidelines

In the event that an issue arises from Section 9, Changes to this Process, or arises from some other Section and 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 appropriate state regulatory agency, if available. If mediation is requested, parties shall participate in good faith.

- 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.

- All participants in the CCP shall be provided timely notice of any mediations or formal complaints.

~~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.~~

~~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.~~

9.0 CHANGES TO THIS PROCESS

Definition

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 versions.

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 (format, typographical errors, clarifications of meaning, etc.) 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. The CCP participants present at the meeting (in person or by teleconference) will reach an initial determination regarding the requested change(s) by "consensus". For this purpose consensus will mean that no participant has serious objection to the determination of the group. The following initial determination may be applied:

- **Meeting Consensus** (BellSouth and the other meeting participants have no serious objection to the change. The change will be balloted for Industry Consensus with the indication that a meeting consensus was reached).

- **Contested Issue** (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are firm. The proposals will be balloted for Industry Consensus and the structure of the ballot will indicate that a choice between alternatives must be made).

- **Not Ready for Balloting** (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are not firm. The request will not be balloted and will remain open for review during subsequent monthly meetings. The CCP participants will continue to use the associated current change control process. Working documentation reflecting both the current and proposed language may be created to facilitate further discussion).

- **Implement as Cosmetic** (BellSouth and the other meeting participants determine that the requested change is a clarification of meaning with no potential negative impact. The change will be implemented and the Change Request will be updated to implemented status and update distributed as per the normal process).

Subsequent to this initial review, the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official Email ballot for distribution to determine the Industry Consensus. The official Industry Consensus ballot will detail the change(s) being requested, and the significant arguments presented for and against the

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change during the review. As noted above. the ballot will indicate whether issues are being voted upon as the result of a Meeting Consensus or as a Contested Issue. Each issue presented on the ballot will contain a statement of the change to be approved and in the case of a Contested Issue. a summary of arguments for and arguments against the alternatives. The ballot will be distributed one (1) week following the Status Meeting. CLECs will have one (1) week in which to cast their vote. Only ballots transmitted before midnight of the due date will be counted. The CCCM. or other designated individual will cast each CLEC's vote. Each CLEC is allowed one vote on each issue presented on the ballot. The CCCM, or other designated individual will cast each CLEC's vote.

The ballot (a sample ballot may be found in the Appendix) will allow CLECs to indicate their agreement or disagreement with the proposed change across a five (5) step continuum as shown here:

A	B	C	D	E
Agree	Generally Agree	Neutral	Somewhat Disagree	Disagree

A		B		C
Agree		Neutral		Disagree

When a Contested Issue is presented on the ballot. there will be a continuum for each of the alternatives and the voter must disagree with one (and only one) of the two.

Industry Consensus will exist and the change will be implemented whenever two-thirds of votes cast by the due date are cast in categories A **and B** through D. BellSouth may not be able to support all requested changes to the process as proposed. BellSouth will provide a supporting reason(s) to substantiate its position. A CLEC may seek relief through the escalation process if dissatisfied with BellSouth's response. No consensus will exist if over 1/3 of votes for a change are cast in category **C** E "Disagree".

10.0 TESTING ENVIRONMENT

Definition

BellSouth offers Interface and Functional testing to CLECs for the **Local Exchange Negotiation System (LENS), the** Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are as follows:

- **CLEC Interface Testing** – Testing for CLECs implementing a new interface, product or release.

- **Functional Testing** – Testing conducted in the CLEC Application Verification Environment (CAVE), where CLECs can opt to do further functional testing, or testing to implement a new release.

Test Phases

The following defines the different phases of testing supported by BellSouth:

- Physical Connectivity Testing – This required phase of testing verifies communication is properly established and that both parties can send and receive electronic messages. Applicable to LAN users only.

- Application Connectivity Testing – This required phase of testing verifies communication is properly established between BellSouth platforms and CLEC specified connectivity methods such as:

  o EDI – VAN or CONNECT:Direct®
  o TAG
  o **LENS**

- API Testing – This optional phase of testing allows the CLEC to verify their software before Application Testing. No test cases are provided and testing is done against the simulator. This phase of testing applies only to CLECs using TAG.

- Application Testing – This conditional phase of testing uses a simulator and verifies that the mapping of data is correct and the CLEC software can communicate with BellSouth. This phase is required for TAG users when implementing a new interface, new TCIF issue or new product. This phase of testing verifies Pre-ordering and Ordering data mapping.

- Syntax Testing – This phase of testing verifies compliance to pre-determined structures such as ANSI ASC X12 EDI standards and TCIF industry standards. This phase of testing is required when implementing a new EDI interface or moving to a new EDI map.

- Validity Testing – This phase of testing verifies that the CLEC software can execute firm order test cases in compliance with the BellSouth Business Rules. This phase of testing is required when implementing a new interface, new product, or new TCIF issue.

- Production Verification Testing – This required phase of testing allows BellSouth and CLECs to confirm that transactions flow to the production environment. CLECs are required to submit a production transaction with live data. BellSouth will monitor to ensure that back-end applications can be accessed.

- Service Readiness Testing – This phase of testing only applies if it is included in the CLEC's Interconnection Agreement. This optional phase of testing allows a CLEC to test firm orders end-to-end. This is in BellSouth production environment.

- Functional Testing – This optional phase of testing, conducted in CAVE, allows a CLEC to perform functional testing for ordering on pre-production and post-production releases during the specified period. CLECs may choose to do additional functional testing in CAVE after other phases of testing are complete, or they may use CAVE for new release Functional testing in preparation for migrating to a new release.

All arrangements for testing should be coordinated with the BellSouth Account Team's Sales Support. **[Following the completion of the transition process for account team functions described in Carrier Notification Letter SN 91082802, dated January 4, 2002, the proper point of contact will be identified here.]** BellSouth will maintain a testing profile for each CLEC that will be updated annually. This profile will preclude the need to provide detailed test survey information or negotiate and individual agreement for each testing session a CLEC wishes to conduct during a calendar year – only information unique to a specific testing session (dates and desired scenarios) will need to be provided.

Change Control will communicate the CAVE **opening of the** testing window for each release. **Once open for a given release BellSouth will provide CAVE access for that release until such time as it is necessary to prepare CAVE for implementation of the next release.**

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

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www.interconnection.bellsouth.com/carriertypes/lec/html/oss_info.html

Testing In CAVE

BellSouth provides a CLEC Application Verification Environment (CAVE) for the testing of application-to-application interface for pre-order and order via TAG, EDI and LENS. CAVE allows CLECs to test their application against new release functionality. It also allows CLECs currently in production who need to perform regression testing, due to changes within their own applications, to notify their Account Team Representative as needed to create and implement a test plan in CAVE.

1. BST will provide the required information regarding CAVE and the procedures for testing a new release 30 days prior to the opening of the test window.Such information will include but not be limited to, types of preorder and order transaction available to test via CAVE., account structure, etc.
2. BST will provide Baseline Validation Test Decks. BST will ~~should~~ provide quality baseline validation/regression test decks of pre-order and order transactions that will be used to test a new release. These test deck scenarios accounts are available for CLECs to use during the testing period. However, CLECs are not limited to these transactions and accounts and may request additional support from BST to build specific test accounts in CAVE. BST will run the regression test decks before the CLEC test period begins and at the conclusion of CLEC testing new release testing.
3. BST will identify the process for testing the new release in CAVE.
4. BST will provide a New Release Testing Schedule.
5. Once open for a given release BellSouth will provide CAVE access for that release until such time as it is necessary to prepare CAVE for implementation of the next release.

RELEASE IMPLEMENTATION DECISION

The implementation of each release shall be mutually agreed between BellSouth and the participating CCP CLECs on the Monday prior to the scheduled implementation. BellSouth's participants shall include subject matter experts familiar with and responsible for the implementation of change requests to the interfaces, linkages and legacy systems impacted by proposed changes. A "go/no go vote" shall be held and decided upon the basis of consensus of the participating CLECs. Where the CAVE environment has been made available and operated satisfactorily the results of that testing shall be considered in addition to CLEC reviews of BellSouth's specifications and internal testing results. Where CAVE testing is either not available or has not functioned properly CLEC reviews of

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BellSouth's specifications and internal testing results will be considered and may be sufficient to reach a consensus.

11.0 TERMS AND DEFINITIONS

A

ACCOUNT TEAM[Following the completion of the transition process for account team functions described in Carrier Notification Letter SN 91082802, dated January 4, 2002, the proper point of contact and functions will be identified here.]

The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLEC's advocate within BellSouth. Some of the Account Team functions are listed below:
- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

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

ACKNOWLEDGMENT 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 all Change Requests.

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

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

BUSINESS RULES

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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 (5) primary transactions sets: 850, 855, 860, 865 and 997

- Data Element Abbreviation and Definition

- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)

- Conditions/rules associated with each Activity and Usage Type
  - Dependencies relative to other data elements
  - Conditions which will be edited within BellSouth's OSSs

- Valid Value Set

- Data Characteristics

C

CANCELLATION NOTIFICATION
Notification returned to originator by the BCCM indicating a Change Request has been Canceled for one of the following reasons: Originator 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 a 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 or expedited features or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.
- Type 2-5 – Expedited Feature Change. 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: 1) A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an ordering enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact.
- 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 6 – CLEC Impacting Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

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.

- **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

Jointly Developed by the Change Control Sub-team comprised of
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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.~~Any change that potentially may cause a CLEC to modify the way it operates in conducting wholesale business transactions with BellSouth. Modifications to the way CLECs operate in conducting wholesale business transactions with BellSouth include, but are not limited to: (1) changes to CLEC system code; (2) changes in CLEC employee training; (3) changes to CLEC business methods and procedures at the transaction, clarification, or escalation levels (4) changes to the work assignments of CLEC personnel. Internal BellSouth process changes (either software or procedural) unique to the CLEC wholesale environment are CLEC affecting. [14]

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

---

[14] [13] [14] The procedures described in this document apply to all three groupings of the components of "interfaces" as described by the FCC. These include (1) a point of interface (or gateway); (2) any electronic or manual processing links (transmission links) between the interface and BellSouth's internal operations systems (including all necessary back office systems and personnel); and (3) all of the internal operations support systems (or "legacy systems") that BellSouth uses in providing network elements and resale services to competing carriers.

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Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

DEFECT STATUS

The status of a CLEC Impacting Defect 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, or CLEC training issue.
- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N ◫ New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
- **V ◫ Validated Defect.** 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).

<u>E</u>

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

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systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

EXPEDITED FEATURE

An expedited feature is the inability for a 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 submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an ordering enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact. For both re-classified defects and enhancements to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing interface
- Will follow the Expedited Feature process flow which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 that 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.

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

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___

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

P

POINTS OF CONTACT (POC)
> An individual that functions as the unique entry point for change requests on this process.

PRIORITY
> The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.
>
> One of four priorities may be assigned:
>> **1-Urgent.** Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.
>> **2-High.** Implement in the next possible scheduled major release, as determined during the Release Package Meeting.
>> **3-Medium.** Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.
>> **4-Low.** Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

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

PROPOSED RELEASE PACKAGE
> Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting.

R

RELEASE – INDUSTRY
> The implementation of new industry standard(s) which may impact and require CLECs to make changes to their interface. An industry release may prohibit the use of an interface upon implementation of the Change(s).

RELEASE – MAINTENANCE
> The implementation of scheduled maintenance of a BellSouth system that does not require CLECs to make changes to their interface or prohibit the use of an interface upon implementation. System downtime may be required.

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RELEASE – PRODUCTION ~~MAJOR~~
The implementation of scheduled Change(s) which may impact and require the entire CLEC community to make changes to their interface. A <u>production</u> ~~major~~ release may <u>or may not</u> prohibit the use of an interface upon implementation of the Change(s).

~~RELEASE – MINOR~~
~~The implementation of scheduled Change(s) that may not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation.~~

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

RELEASE CAPACITY MEASUREMENT – PRE-RELEASE
BellSouth will provide preliminary unit measurement estimates accompanying each change request that can be used by the CLECs during prioritization. BellSouth will provide the total number of units available for a specific release to be utilized as a tool for prioritization. Total number of units will be provided as follows:

Total Release Units
- Units required to perform release maintenance
- Units required to implement public switched network mandates such as NPA overlays and Number Pooling
- Units required to implement Type 6 Change Requests
- Units required to implement Type 2 Change Requests
= Remaining Units Available for the prioritization and implementation of Type 4 and Type 5 Change Requests

RELEASE CAPACITY MEASUREMENT REPORT – POST RELEASE
At the end of each quarter Bellsouth will provide a report listing the percent YTD capacity used during the quarter. Quarterly report is APPENDIX I. The process is effective January 2002 with Release 10.3.1. Attached to this report will be a list of all Type 2, 3, 4, 5, 6 change requests that were implemented.

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 and/or 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

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

V

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

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APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 = A4A contains sample Change Control forms and line by line Checklist.

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).

Acknowledgment Notification.

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

Acknowledgment Notification Checklist.

Provides line-by-lines instructions for completing the Acknowledgment 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).

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

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

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation are 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 Maintenance/Defect Notification Information (web posting)

- Draft Release Project Plan – WBS (email attachment created by the Lead Project Manager(s) assigned in Step 8 of the Change Control Process)

- Lead Project Manager(s) assigned to the Release with reach numbers(s)

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

APPENDIX C – ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D – BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

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

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen — **updates will be implemented to correct defects (Type 6 Changes) and to comply with Regulatory Mandates within the capabilities of the frozen industry standard.** -no other 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.

APPENDIX E – SUB-TEAM DEFINITION AND ROLES/RESPONSIBILITIES

A Sub-Team will be formed for issues that are more effectively addressed in a small group setting.

The Sub-Team will consist of CLECs and BellSouth who volunteer to participate in meeting(s) to address a specific issue. This team will be responsible for presenting information and making recommendations to the CLEC participants of Change Control.

The Change Control Management Team will be responsible for coordinating meetings and the flow of communication.

The Sub-Team leader will participate in each Monthly CCP Status Meeting occurring during the life of the Sub-Team.

APPENDIX F – "SAMPLE" VOTING BALLOT

ITEM NO. XX - Meeting Consensus Description of Section	☐ Agree ☐ ~~Generally Agree~~ ☐ Neutral ☐ ~~Somewhat Disagree~~ ☐ Disagree
ITEM NO. XX – Contested Consensus (Voters must disagree with one (1) of the following recommendations and indicate ranking of the other) Description of Section CLEC Recommendation	☐ Agree ☐ ~~Generally Agree~~ ☐ Neutral ☐ ~~Somewhat Disagree~~ ☐ Disagree
BellSouth Recommendation	☐ Agree ☐ ~~Generally Agree~~ ☐ Neutral ☐ ~~Somewhat Disagree~~ ☐ Disagree

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APPENDIX G – CARRIER NOTIFICATIONS

Carrier Notifications for updates to the Local Exchange Ordering Guide – Volume 1 and the BellSouth Business Rules for Local Ordering (BBR-LO) indicate if the change impacts documentation only or the electronic and/or manual ordering processes, if known. Details of the change are contained in the Summary of Changes that is distributed to the CLECs via email.

Change Request number(s) will be listed in the associated Carrier Notifications for software releases, if applicable. Associated documentation changes for software releases are also reflected in the Carrier Notification Letter.

A table consisting of the scheduled release dates and an itemization of release features is attached to each revised Carrier Notification letter. Each revised letter provides direct access to the original letter.

NOTE: BellSouth Carrier Notifications are located on the BellSouth Interconnection Website at: www.interconnection.bellsouth.com/main/clec.html

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Appendix H: Preliminary Feature Sizing Model for CCP Prioritization Planning.

Preliminary Feature Sizing Model for CCP Prioritization Planning

CR Number :	DESCRIPTION:		Draft User Requirement: (Y/N)	Synergies with Other Related CRs
Type CR:				
Systems	System impacted Y/N	Level of Work Effort: List Number of Units. (incremental units in quarters is permissable) 1 Unit=100 Release Cycle Hours	Constraints/ Comments	Integrated Testing Required (Y/N)
LENS				
TAG				
EDI				
LESOG				
LNP				
SGG				
DOM				
Other (List each)				

Working document for use in CCP forum in Preliminary Stage of Prioritization Planning. Actual resource capacity used will be provided in the quarterly Year to Date Capacity Measurement Report that will be issued beginning in 2002.

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Field Description:

CR Number: The Change Control Process Change Request Number (CR) assigned to feature.

Type CR: Type 4 (BST Initiated) or Type 5 (CLEC Initiated)

Description: The Change Control Process Change Request description that coincides with the CR Number.

Draft User Requirement: (Y/N): Yes indicates a Draft User Requirement was available when sizing was performed. No indicates a Draft User Requirement was not available when sizing was performed.

Synergies with Other Related Change Requests: List of related change requests that may benefit from being implemented at the same time as this feature.

Systems: A list of CLEC interface systems and key operation support systems that will require a work effort to implement this feature.

       LENS – Local Exchange Navigation System
       TAG – Telecommunications Access Gateway
       EDI – Electronic Data Interchange
       LESOG – Local Exchange Service Order Generator
       LNP – Local Number Portability
       SGG – Service Gate Gateway
       DOM – Delivery Order Manager

System impacted: Yes indicates this system will require a level of work effort to implement this feature. No indicates this system will not require a level of work effort.

Level of Work Effort: List Number of Units. (incremental units in quarters is permissible.): The total number of planning, analysis, design, code development, testing and implementation units required for the implementation of this change request. One Unit=100 Release Cycle Hours.

<u>Release Cycle Hours (RCH): RCH = the total number of hours estimated for planning, analysis, design, code development, testing and implementation for a single change request.</u>

<u>Constraints/Comments: If a constraint in implementing this feature is critical to implementation it will be listed. For example, if a system affected has an annual release schedule, this will be listed as a constraint.</u>

<u>Integrated Testing Required (Y/N): Yes indicates that integration testing is required. No indicates there is no integration testing required.</u>

<u>Total Units: Equals the total units of systems impacted.</u>

<u>Appendix I: Monitoring and Reporting Post-Release Capacity Utilization</u>

<u>Annual Release Capacity Utilization – YTD Quarterly Report</u>										
<u>Categories</u>	<u>1Q</u>		<u>2Q</u>		<u>3Q</u>		<u>4Q</u>		<u>YTD / EOY</u>	
	<u>Units</u>	<u>%</u>	<u>Units</u>	<u>%</u>	<u>Units</u>	<u>%</u>	<u>Units</u>	<u>%</u>	<u>Units</u>	<u>%</u>
<u>Maintenance</u>										
<u>PSN Mandate</u>										
<u>Regulatory (Type 2)</u>										
<u>Defects (Type 6)</u>										
<u>Industry (Type 3)</u>										
<u>BellSouth (Type 4)</u>										
<u>CLEC (Type 5)</u>										
<u>Total</u>										

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