BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF RONALD M. PATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 000731-TP

JANUARY 3, 2001

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

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed direct testimony – with exhibits – on November 15, 2000.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my rebuttal testimony is to address various concerns and issues raised in the direct testimony filed by AT&T – specifically that of

AT&T Witness Jay M. Bradbury – in areas related to Operations Support Systems ("OSS"). I will respond to Mr. Bradbury's allegations made against BellSouth in the following:

Issue 25 – Operator Services/Directory Assistance ("OS/DA")
Issue 30 – BellSouth's Change Control Process ("CCP")
Issue 31 – Specific changes to BellSouth's ordering and pre-ordering interfaces
Issue 32 – Specific improvements to BellSouth's maintenance and repair interfaces

I will show that, for each area listed above, BellSouth has taken positive steps to respond to AT&T's formal requests, *if doable and reasonable* – the same as BellSouth would do for any ALEC. Very simply, it is BellSouth's position that it is in compliance with current FCC and state commission orders and rulings with regard to its dealings with ALECs, and that BellSouth continues to monitor itself for such compliance in the face of an ever-evolving industry.

Issue 25: What procedures should be established for AT&T to obtain loop-port combinations (UNE-P) using both Infrastructure and Customer-Specific Provisioning?

Q. MR. BRADBURY CONTENDS ON PAGE 22 OF HIS TESTIMONY THAT BELLSOUTH HAS NOT SUPPLIED AT&T WITH ALL OF THE DETAILED

TECHNICAL METHODS AND PROCEDURES THAT IT NEEDS TO IMPLEMENT OPERATOR SERVICES/DIRECTORY ASSISTANCE ("OS/DA") ROUTING. WHAT HAS BELLSOUTH PROVIDED TO AT&T IN REGARD TO OS/DA?

A. As I stated in my direct testimony, BellSouth provided AT&T with proposed contractual language for the three types of routings for its OS/DA calls (unbranded, branded and third-party platform). AT&T was given the unbranded contractual language in August, 2000, and both the branded and third-party platform contractual language in October, 2000. Each document provides the process for establishing the AT&T "footprint order" for that particular option, and these three documents are provided together as Exhibit RMP-19.

Additionally, Mr. Bradbury states in a footnote on Page 35 that "AT&T has yet to receive footprint ordering instructions from AT&T". While it is likely that he meant to refer to BellSouth in that footnote, BellSouth, in fact, provided the user requirements for the unbranded OS/DA option – with ordering instructions – to AT&T mid-November, 2000 in response to their actual request for that option for a specific project – the so-called "friendly test" to which he refers on Page 36. In fact, that test is the only request that AT&T has made of BellSouth for the actual provisioning of OS/DA routing. The User Requirements document is provided as Exhibit RMP-20.

Mr. Bradbury also claims that BellSouth "has not produced detailed technical methods and procedures sufficient to inform AT&T of requirements for ordering customized routing". The aforementioned User Requirements document provides that information for the only firm request that AT&T has made to BellSouth for the provisioning of OS/DA routing.

Q. WHAT OTHER INFORMATION DOES BELLSOUTH THINK THAT AT&T NEEDS TO ESTABLISH THE "FOOTPRINT ORDER" AND CUSTOMER-SPECIFIC PROVISIONING FOR UNBRANDED OS/DA?

A. None.

Q. MR. BRADBURY STATES ON PAGE 32 OF HIS TESTIMONY THAT BELLSOUTH PROVIDES NO PROCESSES FOR ELECTRONIC ORDERING OF CUSTOMER-SPECIFIC OS/DA. IS THAT TRULY THE CASE?

A. Definitely not. Mr. Bradbury also cites on Page 32 AT&T's formal change request (EDI020900_001 – Electronic Order Routing to OS/DA) submitted in February, 2000, and this is the same change request for which BellSouth implemented the OS/DA unbranded option as part of Release 8.0 on November 18, 2000. Because of this implementation, orders issued by AT&T for its specified project can be submitted electronically by simply following the BellSouth business rules for ordering port/loop

combinations. No special or additional entries are required on the Local Service Requests ("LSRs").

Q. IN HIS TESTIMONY, MR. BRADBURY MAKES REFERENCES ON PAGES 32 THROUGH 36 REGARDING BELLSOUTH'S "UNILATERAL DECISION" TO REMOVE THIS FEATURE FROM RELEASE 8.0. SINCE THE FEATURE HAS BEEN IMPLEMENTED, WHY DOES HE ALLEGE SUCH A DECISION?

A. It is unclear why Mr. Bradbury continues to make an issue of a decision that occurred through some miscommunication, but that was never implemented. BellSouth has acknowledged that it mistakenly decided and communicated that the feature would be removed from Release 8.0. More importantly, however, immediate action was taken when the situation was brought to Mr. Keith Milner's and my attention. The release occurred as scheduled with all of the parts necessary to allow electronic ordering as requested by AT&T.

Q. PLEASE SUMMARIZE YOUR COMMENTS ON THE OS/DA ISSUE.

A. This issue continues to be a problem for which there seems to be no viable solution that will satisfy AT&T. Mr. Milner once again discusses the issue in his testimony, but the bottom line is that we have furnished AT&T the information necessary to do electronic ordering in the one case where AT&T has indicated a desire to do so. AT&T seems to want something

more, which, as Mr. Milner describes, is beyond the pale. Based upon AT&T's requests for documentation and availability of all OS/DA options in all locations, it is clear that AT&T would like for BellSouth to equip all central offices in BellSouth's nine-state region with all of the OS/DA options in the unlikely event that an ALEC (more precisely, AT&T) *might* want to place orders at any time and at any place. That simply isn't feasible based upon an overall lack of ALEC demand for OS/DA options, nor is it viable from a financial standpoint. While providing OS/DA options on an as-requested basis may not suit all of AT&T's requirements, BellSouth nonetheless has a reasonable process for providing OS/DA. AT&T's opinion of what is reasonable for BellSouth to do on a region-wide basis is simply that – its opinion.

I'd like to add that BellSouth has made that process available to all ALECs, and posted that information on BellSouth's Interconnection Services website via Carrier Notification SN91082004 on November 22, 2000 (Provided as Exhibit RMP-21). Per the instructions in the Carrier Notification, inquiries for this feature may be made to the ALECs' account team representative.

Q. IN HIS SUMMARY ON PAGE 36, MR. BRADBURY ASKS THE COMMISSION TO PROVIDE AT&T WITH SPECIFIC DOCUMENTED METHODS AND PROCEDURES FOR EACH OF THE CUSTOMIZED ROUTING METHODS. DO YOU HAVE COMMENTS ON THAT REQUEST?

A. Yes. As BellSouth provided AT&T with the appropriate methods and procedures for the unbranded option at such time as they made an actual request for BellSouth to provide that option, so, too, would BellSouth provide the same for either of the other two options based upon the specificity of AT&T's request.

Q. WHAT WOULD YOU LIKE FOR THE COMMISSION TO DO IN RESPONSE TO AT&T'S ALLEGATIONS?

A. Find that BellSouth has responded to AT&T's change request to implement electronic ordering for OS/DA capability based upon the parameters of its specified project, and the process doesn't require AT&T to place any special indicators on its LSRs. In addition to documentation given to AT&T for this project, BellSouth has also provided instructions on how to obtain other options of OS/DA routing for future requests, and has made that same information available to the general ALEC community. BellSouth believes it has satisfied what Mr. Bradbury outlines in his summary request of this Commission.

Issue 30: Should the Change Control Process be sufficiently comprehensive to ensure that there are processes to handle at a minimum the following situations:

a) introduction of new interfaces

b) retirement of existing interfaces

c) exceptions to the process

d) documentation, including training

e) defect correction

f) emergency changes (defect correction)

g) an eight-step cycle, repeated monthly

h) a firm schedule for notifications associated with changes initiated by BellSouth

i) a process for dispute resolution including referral to state utility commissions or courts

j) a process for escalation of changes in process

Q. ON PAGE 49 OF MR. BRADBURY'S TESTIMONY REGARDING BELLSOUTH'S CHANGE CONTROL PROCESS ("CCP"), HE CLAIMS THAT BELLSOUTH'S CCP IS INADEQUATE. WOULD YOU PLEASE RESPOND TO THAT CLAIM?

A. Yes. I will start by reiterating BellSouth's position from my direct testimony that the Change Control Process is not a proper issue for arbitration with an individual ALEC before an individual state commission. The CCP covers BellSouth's regional interfaces and processes, and affects a CCP membership of what has grown to approximately 100 ALECs. Collaborative decisions that come from issues submitted to the CCP ultimately affect over 300 ALECs and CLECs that are currently actively operating in BellSouth's nine-state region (Note: There are over 1,600 commission-approved ALECs and CLECs around the region). As I stated

in my direct testimony on Page 22, our position is supported by the North Carolina Public Service Commission's Staff proposed recommended order from similar arbitration proceedings which states that "this arbitration docket is an inappropriate forum for consideration of wholesale modifications to the CCP or the CCP document, as proposed by AT&T."

Moving beyond this, however, the issue of the adequacy of BellSouth's CCP also is being addressed by KPMG, the company approved by the Florida and Georgia Public Service Commissions to perform Third Party Testing per the orders of those Commissions. BellSouth believes that determination of adequacy of the CCP for Florida can be properly assessed and documented as part of the Third Party Testing process.

Q. MR. BRADBURY FURTHER STATES ON PAGE 55 OF HIS TESTIMONY THAT BELLSOUTH'S CCP IS "NOT COLLABORATIVE". WHAT IS BELLSOUTH'S VIEW OF THE COLLABORATIVE NATURE OF THE CCP?

A. The process is clearly "collaborative." It is just not subject to the control of AT&T, which is Mr. Bradbury's real issue. Mr. Bradbury insists that the CCP document Version 2.0 is the appropriate document to discuss in this arbitration, as he states on Page 58 of his testimony. However, while explaining how the Commission should order adoption of AT&T's proposed "red line" Version 2.0, he fails to mention that AT&T's document also has been submitted to the CCP as a change request and that a

decision was made within the CCP (and not just at BellSouth's insistence, as Mr. Bradbury alleges in his footnote on Page 51 of his testimony) to develop a sub-team of ALECs to collectively build upon AT&T's original proposed changes, and to present a joint ALEC proposal to the total CCP membership. AT&T's regular representative to the CCP agreed to the suggestion, and also agreed to head the effort. It is not clear how BellSouth and the other ALEC's could be acting more "collaboratively". We just aren't doing precisely what AT&T wants, which evidently makes us "non-cooperative."

Also missing from his discussion is the fact that BellSouth has made its own proposal to the CCP in response to the joint ALEC proposal. On December 5, 2000, BellSouth submitted its proposed changes to CCP document Version 2.0 to the sub-team, and that document – which includes both the ALEC-proposed changes and BellSouth's agreement, disagreement or compromise proposal to those changes – is the document that is currently under review by the sub-team. It is provided as Exhibit RMP-22. I will refer to it later in this testimony to show the Commission that AT&T's various claims of inadequacy and non-collaborative process cannot be supported.

In addition to KPMG's Third Party Testing assessment and documentation of BellSouth's CCP, the current sub-team activity suggests that the ALECs *and* BellSouth are interested in working toward solutions and compromises that *improve the current* process and are acceptable to the

industry *as a whole*. The point is that the CCP is an evolving process, and BellSouth feels it is more appropriate to look at the current and future direction of the CCP rather than simply acceding to AT&T's demands, which is evidently all that will satisfy AT&T in this regard.

Q. MR. BRADBURY ALSO CLAIMS ON PAGE 55 THAT BELLSOUTH HAS TOTAL CONTROL AND VETO POWER OVER THE CCP, AND "MAY SIMPLY IGNORE THE BUSINESS NEEDS AND WISHES OF THE ALEC COMMUNITY". HOW DO YOU RESPOND TO THIS CLAIM?

A. What he really means is that there isn't a line in the CCP that indicates that whatever AT&T wants, it gets, irrespective of whether the request is reasonable or even concurred in by the rest of the affected ALECs. As part of the CCP's collaborative effort – where consensus is required to make decisions – BellSouth and the ALECs have made a concerted effort to incorporate all reasonable and doable requests for changes. That is reflected in BellSouth's CCP document Version 2.0. AT&T apparently feels that BellSouth has no rights as a stakeholder in this process, and should automatically acquiesce to ALEC requests even if those requests fall outside of BellSouth's obligations under FCC orders, are not doable under BellSouth's current processes, or require BellSouth to make substantial financial investment for a limited potential utilization by the ALEC community as a whole.

BellSouth follows the review process as stated in the CCP guidelines for all change requests submitted by ALECs, and responds via the CCP in what it feels is the appropriate manner, and gives appropriate consideration to each such request. The idea that BellSouth has final veto power is addressed by the CCP guidelines for dispute resolution as I explained fully in my direct testimony (See Pages 64-65 of Exhibit RMP-22 for BellSouth's proposed wording changes to the existing Dispute Resolution section). Suffice it to say here that the option exists for AT&T or any other ALEC to take a dispute to a higher authority for resolution, if necessary.

Q. MR. BRADBURY CONTENDS ON PAGE 56 OF HIS TESTIMONY THAT BELLSOUTH DID NOT COMPLY WITH A CCP REQUIREMENT THAT "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". ARE YOU FAMILIAR WITH THIS SITUATION?

A. Yes. Mr. Bradbury is referring to Release 8.0, which was implemented on November 18, 2000, and contained several low-priority items, along with several high-priority items. Although some "low-priority items" were included in the release, this in no way impacted whether other high-priority items could have been included. In many instances during major releases, there are changes that can be made with very little expenditure of time and/or money, or without extensive software development. Since

the low-priority items are on the list to be worked at some point anyway, it makes perfect sense to include all that can be included without jeopardizing implementation milestones, which would have been the case had BellSouth tried to include too many of the high-priority items. Filling out a release with "easy-to-accomplish" items, even if they are low priority, only makes sense. Release 8.0 could have been implemented without the "low-priority items" but no additional "high priority" items would have been included as a result. That doesn't make much sense, but is typical of the sort of complaint that AT&T seems intent on making until it finally just gets its own way.

Mr. Bradbury would have this Commission believe that BellSouth does this in an attempt to delay or harm the ALECs' ability to compete, and that simply isn't the case. I will further add that it has long been the procedure to rely on the use of "point" releases (e.g., 8.1, 8.2, etc.) to pick up additional high- and low-priority items without waiting for the next major release (e.g., 9.0, 10.0, etc.).

Q. MR. BRADBURY FURTHER ASSERTS ON PAGE 56 THAT BELLSOUTH "ROUTINELY ELECTS NOT TO COMPLY" WITH THE CCP'S REQUIREMENTS, USING AS AN EXAMPLE THE RELEASE OF ISSUE 9G OF BELLSOUTH'S BUSINESS RULES FOR LOCAL ORDERING, WHICH HE CLAIMS WAS DONE WITH LITTLE ADVANCE NOTICE TO ALECs, THAT BELLSOUTH REFUSED TO WITHDRAW THE CHANGES, AND THAT THE RELEASE CONTAINED

PROGRAMMING DEFECTS THAT COULD HAVE BEEN AVOIDED HAD BELLSOUTH MADE THE RELEASE AVAILABLE TO ALECS FOR PRE-TESTING. WHAT IS YOUR RESPONSE?

A. First, let me say that BellSouth does not "routinely" elect not to comply with the CCP's requirements. With that said, it appears that AT&T has managed to identify one situation where BellSouth should have run a release through the CCP and failed to do so. This was Issue 9G of the BellSouth Business Rules for Local Ordering ("BBR-LO"). We posted the notice on August 31, 2000, to be effective October 2, 2000, thus providing the requisite notice. We did not, however, properly process the matter through the CCP. That is, the release was intended to correct defects in documentation that had previously been identified. In addition, there was one minor software change that was also included in the release. Unfortunately, and as AT&T knows, there was a problem with the software change which was corrected soon thereafter. Our rationale for going forward with the release of the documentation changes, which is no excuse for not following the process, was that the documentation changes were corrections to existing documentation, which should not have been anything other than a ministerial task, and was for the purpose of benefiting the ALECs who rely on the documentation that was being corrected. This is not, however, a systemic problem that I am aware of. Given AT&T's penchant for documenting alleged problems, one would assume that if this were a regular and constant problem, they would have reams of examples. I do not believe this is the case. Our company is

committed to following the CCP. We have agreed to language that requires us to do so. I wish I could guarantee that we would never make a mistake, but that would simply be unreasonable. We are committed to using our best efforts to make this process work, and we believe that on the whole it does.

Q. ON PAGE 51 OF MR. BRADBURY'S TESTIMONY, HE STATES THAT THE CURRENT CCP "FAILS TO COVER ALL AREAS THAT SHOULD BE INCLUDED IN A ROBUST CHANGE CONTROL PROCESS" PER THE FCC'S GUIDANCE. WHAT IS BELLSOUTH'S OPINION OF COVERAGE OF THE AREAS SPECIFIED BY MR. BRADBURY?

A. BellSouth cannot find one area listed by Mr. Bradbury that isn't covered by BellSouth's CCP document Version 2.0, or any proposed version. He also inexplicably refers to the I-CCP, and regardless of whether he means the original interim CCP or an earlier version of the CCP document, the reference has no relevance in a discussion of the current Version 2.0. Mr. Bradbury also uses the phrases 'does not adequately cover' or 'does not provide an adequate process for' as he delineates the areas that he purports are deficient. Those phrases certainly represent AT&T's highly subjective opinions of those areas of the CCP. However, in spite of AT&T's opinions about the current CCP document, BellSouth firmly believes that the CCP document with both ALEC- and BellSouth-proposed changes (Exhibit RMP-22) that is currently under review by the CCP sub-team will ultimately become the document that best serves the interest of

the ALEC community as a whole, as well as BellSouth. The consensus acceptance of the proposed document as the new baseline document should render AT&T's complaints and allegations moot. Moreover, consider this additional point. There are dozens of arbitrations going on around the BellSouth region at this point. AT&T is the only ALEC that is making the CCP an issue in the detail that is being presented here today. The CCP may not meet AT&T's subjective standards (more of the "not invented here" syndrome, probably), but clearly any number of ALECs are using the system, without the incessant complaining that seems to have become AT&T's hallmark.

Q. BEGINNING ON PAGE 59 OF MR. BRADBURY'S TESTIMONY, HE MAKES ALLEGATIONS REGARDING EACH OF THE SUB-ISSUES OUTLINED AT THE HEAD OF THIS ISSUE SECTION. HOW WILL YOU RESPOND TO EACH SUB-ISSUE?

A. In the preceding answer, I addressed Mr. Bradbury's general statements regarding these sub-issues. As Mr. Bradbury has done beginning on Page 59, I will address each sub-issue in order and with more specificity. Although CCP document Version 2.0 (dated August 23, 2000) is the current operational document, BellSouth believes that it is more instructive and forward-looking to consider the document with both the ALEC- and BellSouth-proposed changes (Exhibit RMP-22). As I mentioned above, this is the document currently under review by the sub-team, and, once concurrence is reached by the CCP on the changes to be adopted, it will

become the new operational document. No doubt AT&T would prefer to continue looking only at the August 23, 2000 document and the ALEC-proposed changes in an effort to minimize the amount of collaborative effort put forth by BellSouth in an attempt to better respond to the ALEC community as a whole, but if the Commission is going to look at this document, it ought to look at the most current version or at least at the language that has been agreed to by the majority of the participating ALECs.

I would also like to point out that, although the joint issues matrix agreed upon by AT&T and BellSouth prior to the arbitration contains sub-issues (a) through (j) for Issue 30, Mr. Bradbury has chosen to use his direct testimony to introduce and address additional sub-issues (k) through (o) which were not included in the matrix. I will not offer rebuttal to these inappropriate inclusions, and request that the Commission disregard them.

a) Introduction of new interfaces

Q. MR. BRADBURY STATES THAT LANGUAGE PROPOSED BY BELLSOUTH WOULD ALLOW ONLY BELLSOUTH TO DETERMINE WHETHER CHANGES TO NEW INTERFACES SHOULD BE MANAGED UNDER THE CCP DOCUMENT. PLEASE RESPOND.

A. BellSouth's proposed language actually states on Page 56 of Exhibit RMP-22 that changes to new interfaces would, in fact, be managed by the

process. Further, any new interfaces deployed by BellSouth will be introduced to the ALEC community as part of the CCP. This is consistent with my statements on Page 48 of my direct testimony.

b) retirement of existing interfaces

Q. ON PAGE 60 OF MR. BRADBURY'S TESTIMONY HE INDICATES THAT BELLSOUTH AND AT&T HAVE REACHED AGREEMENT ON A PORTION OF THIS ISSUE. DOES BELLSOUTH AGREE WITH HIS ASSESSMENT?

A. Mr. Bradbury is correct in his assessment of the issue as it relates to BellSouth and AT&T. However, it must be stressed that the CCP Version 2.0 document being presented for discussion as part of this proceeding is a document being used in the collaborative effort of the CCP subcommittee. Thus, the proposed language is an issue for the CCP to render final approval for this ALEC-wide issue.

I would like to point out that BellSouth has proposed language regarding advanced notification of 120 days for the retirement of old *versions* of interfaces on Page 57 of Exhibit RMP-22. Previously, there had been no stated advance notification interval.

c) exceptions to the process

Q. MR. BRADBURY STATES ON PAGE 61 OF HIS TESTIMONY THAT AT&T WANTS A DOCUMENTED "EXCEPTION" PROCESS FOR HANDLING TYPE 2-5 CHANGES UNDER UNUSUAL SITUATIONS, AND THAT BELLSOUTH'S PROPOSAL IS UNACCEPTABLE. PLEASE RESPOND.

A. AT&T's desire to have an "exceptions" process is understandable – it would give AT&T an avenue to circumvent the process for all of the special "needs" it devises. In its proposal, AT&T offers no substantive information about what an "exception" might be, and BellSouth strongly believes that all of the situations that may come before the CCP are covered by one of the categories already defined in the process. The process does not need to add terms and/or categories that have no objective criteria to define them, thereby leaving their meaning open to interpretation.

d) documentation, including training

Q. MR. BRADBURY STATES ON PAGE 61 OF HIS TESTIMONY THAT CHANGES WHICH WILL RESULT IN REVISIONS TO THE TRAINING MATERIALS AND JOB AIDS BELLSOUTH PRODUCES FOR ALECS ARE INCLUDED WITHIN THE SCOPE OF THE PROCESS. PLEASE RESPOND.

A. I disagree. As I stated on Page 53 of my direct testimony, documentation defects related to business rules for manual and electronic processes for pre-ordering, ordering and maintenance are part of the CCP, and requests for remedy for such defects can be submitted through the change request process, either by the ALECs or by BellSouth. The development of training materials and job aids for changes to these processes are handled by the appropriate BellSouth training development organization as the interfaces are enhanced through the CCP.

e) defect correction, and

f) emergency changes

Q. IN HIS TESTIMONY ON PAGE 62, MR. BRADBURY GROUPED THESE TWO CATEGORIES TOGETHER – STATING THAT IT IS APPROPRIATE TO DO SO – AND THAT ADOPTION OF AT&T'S PROPOSED CHANGES WILL PROVIDE A DOCUMENTED DEFECT CORRECTION AND EMERGENCY CHANGE PROCESS THAT MEETS THEIR NEEDS. DO YOU AGREE WITH THAT?

A. Not entirely. As I stated in my direct testimony on Page 53, it was BellSouth's understanding that the issue regarding the definition of a defect had been resolved after the addition of language which addressed AT&T concerns. Evidently AT&T's concerns continue to "evolve" as BellSouth responds to AT&T's comments. In fact, BellSouth continues to

work to incorporate more of AT&T's suggested additions to the defect definition regarding requirement defects.

BellSouth believes a process currently exists within the CCP to deal with true emergencies, which are defined as system outages (Type-1 System Outage). For the type of "emergency" to which AT&T refers – a high-impact defect – BellSouth has proposed an interval of two (2) business days to develop and validate a workaround to remedy those situations (See Exhibit RMP-22, Page 47, under Type-6 process flow). This represents an improvement from the current four- (4) day interval. From the point of development of a workaround, implementation of a true fix for the validated high-impact defect would occur within a 4-to-25-business-day range, with BellSouth committing to provide its best effort to minimize the interval.

Mr. Bradbury further states on Page 62 that the "Draft Expedited Feature Process" proposed by BellSouth is applicable neither to defect correction nor emergency changes. That would be appropriate, since the latest BellSouth-proposed expedited feature process (Pages 37-41 of Exhibit RMP-22) is in response to the ALECs' request that the expedited feature process be separated from the defect correction (Type-6) process.

g) an eight-step cycle, repeated monthly

Q. MR. BRADBURY STATES IN HIS TESTIMONY ON PAGE 63 THAT AT&T CONCURS WITH THE NUMBER AND SEQUENCE OF STEPS CONTAINED IN BELLSOUTH'S PROPOSED CCP DOCUMENT VERSION 2.0, FOR TYPES 2-5 CHANGE REQUESTS, BUT SAYS THAT AT&T STILL CONTINUES TO REQUEST REDUCED CYCLE TIMES. HOW DO YOU RESPOND?

A. BellSouth understands that AT&T has concurred in the number and sequence of steps now before the CCP for consideration. BellSouth has also made its own proposals in regard to the cycle times requested by AT&T in Mr. Bradbury's testimony on Page 64, and, as is the case with the CCP document as a whole, BellSouth's proposals are being reviewed within the CCP.

While AT&T requests a reduction from 20 days to 10 days in the cycle time to review change requests for acceptance, BellSouth has responded that it feels that 20 days continues to be a reasonable and appropriate cycle time in order to review the potential impact on other systems, manual processes, documentation and training. Other steps include determining if a change request already exists, determining if it is an ALEC training issue, or determining if the request meets the criteria for an expedited feature. BellSouth wants to ensure that appropriate front-end planning occurs in order to minimize the possibility of defects later

The second cycle time Mr. Bradbury addresses involves a reduction from 30 to 25 days for the internal change management process step – the step where BellSouth and the ALECs analyze impacts, sizing efforts, etc., for change requests that have passed the CCP change request review process and have been designated as candidates for implementation. BellSouth has proposed a more workable solution (as outlined on Pages 54-55 of Exhibit RMP-22), since experience has shown that release schedules may not coincide with the 30- or 25-day interval. BellSouth has proposed that this step occur three-to-four months prior to a release – at the Release Package Meeting – in an effort to allow consideration and re-prioritization of new and/or non-scheduled change requests, without jeopardizing release milestones.

h) a firm schedule for notifications associated with changes initiated by BellSouth

Q. MR BRADBURY STATES ON PAGE 65 OF HIS TESTIMONY THAT BELLSOUTH HAS REFUSED TO PROVIDE ALECS WITH DRAFT SPECIFICATIONS RELATED TO BELLSOUTH-INITIATED CHANGES. IS THAT TRUE?

A. Definitely not. It is more likely that AT&T didn't receive specifications as early as it would have liked. However, in BellSouth's proposed changes to CCP document Version 2.0 (Exhibit RMP-22, Page 22) still under review, BellSouth has addressed the notification schedule. BellSouth's proposed

changes are as follows: user requirements for software releases (90 and 45 days advance notification for draft and final requirements, respectively); new Telecommunications Industry Forum ("TCIF") mapping (180 days advance notification for implementation release date, and 120 and 60 days advance notification for draft and final requirements, respectively); and retirement of interfaces (120 days advance notification for the retirement of old *versions* of interfaces).

In addition to these software- and system-related notifications, BellSouth has also proposed to provide *all* documentation 30 days in advance of the implementation of a change, whether system-affecting or non-system-affecting. Previously, non-system-affecting documentation changes were provided five (5) days in advance.

i) a process for dispute resolution including referral to state utility commissions or courts

Q. ACCORDING TO MR. BRADBURY'S TESTIMONY ON PAGE 66, THIS SUB-ISSUE SEEMS TO BE SATISFIED BETWEEN AT&T AND BELLSOUTH. DO YOU AGREE?

A. Yes, but it would appear that Mr. Bradbury's statement negates his own claim that BellSouth has total control and veto power over the CCP, as he claimed on Page 55 of his testimony, and as discussed earlier in this rebuttal.

j) a process for escalation of changes in process

Q. IN HIS TESTIMONY ON PAGE 66, MR. BRADBURY REFERS TO SPECIFIC INTERVALS THAT AT&T HAS ADDED FOR VARIOUS STEPS OF THE ESCALATION PROCESS. DO YOU OFFER ANY REBUTTAL FOR THIS SUB-ISSUE?

A. Not per se, but I would like to inform the Commission that BellSouth has made its own proposal for reasonable and doable intervals for the escalation process as outlined in Exhibit RMP-22, Pages 58 and 62, for consideration by the CCP sub-team. In summary, BellSouth has proposed the following:

Type-1 issues:	1-day turnaround
Types 2-5 issues:	6-day turnaround
Type-6 High Impact issues:	2-day turnaround
Type-6 Medium and Low Impact issues:	5-day turnaround
Types 4-5 Expedite Process issues:	3-day turnaround

Q. IN LIGHT OF MR. BRADBURY'S OVERALL ALLEGATIONS OF INADEQUACY AND THE NON-COLLABORATIVE NATURE OF BELLSOUTH'S CCP, WHAT WOULD BELLSOUTH LIKE FOR THE COMMISSION TO RULE REGARDING THE CCP?

First, BellSouth would like the Commission to conclude that this matter should be left to the collaborative process that BellSouth has shown to exist. Second, as this Commission has ordered Third Party Testing, BellSouth proposes that the Commission allow that process to determine the adequacy of the CCP, if it has any concerns about simply leaving the matter to the existing CCP process. . Finally, if the Commission wants to go further, BellSouth requests that the Commission view BellSouth's proposed changes to the CCP document Version 2.0 as the appropriate changes that should be made to the existing CCP process.

Issue 31: What should be the resolution of the following OSS issues currently pending in the change control process but not yet provided?

Q. IN HIS TESTIMONY ON PAGES 71-74, MR. BRADBURY CLAIMS THAT BELLSOUTH HAS YET TO PROVIDE AT&T WITH OSS FUNCTIONALITY TO SUPPORT THE QUALITY OF SERVICE ENJOYED BY BELLSOUTH'S RETAIL CUSTOMERS, SPECIFICALLY AS IT REGARDS: A) PARSED CUSTOMER SERVICE RECORDS; B) THE ABILITY TO SUBMIT ORDERS ELECTRONICALLY FOR ALL SERVICES AND ELEMENTS; AND, C) ELECTRONIC PROCESSING AFTER ELECTRONIC ORDERING, WITHOUT SUBSEQUENT MANUAL PROCESSING BY BELLSOUTH PERSONNEL. HOW DO YOU PROPOSE TO RESPOND TO THESE CLAIMS FOR EACH SUB-PART?

A. Even though BellSouth continues to believe that this whole issue is inappropriate for this arbitration because it is being addressed within the CCP, I will address each of the sub-parts in the same order as Mr. Bradbury has.

Sub-Part A) Parsed Customer Service Records

Q. ON PAGES 73 AND 74 OF HIS TESTIMONY, MR. BRADBURY CLAIMS THAT BELLSOUTH SHOULD PROVIDE PARSED CUSTOMER SERVICE RECORDS FOR PRE-ORDERING PURSUANT TO INDUSTRY STANDARDS, AND THAT AT&T MUST RE-ENTER THE SAME DATA WHEN ORDERING, WHICH TAKES TIME AND COSTS EXTRA MONEY. DO YOU AGREE?

A. No, I do not. As I presented in great detail in my direct testimony on Pages 61-67, AT&T has the ability to parse customer service records ("CSRs") to the sub-line level that it wants by doing the parsing on its side of the interface. BellSouth provides the same data stream of CSR information to ALECs –via the machine-to-machine Telecommunications Access Gateway ("TAG") pre-ordering interface – which BellSouth provides to its retail units. As detailed in my direct testimony, TAG is based on the Common Object Request Broker Architecture ("CORBA") industry standard. Further, as stated on Page 62 of my direct testimony, the FCC has contradicted AT&T's interpretation of the Bell Atlantic New York order by saying that "we have not previously stated that a BOC ["Bell

Operating Company"] must perform parsing on its side of the interface." (AT&T Texas I Dalton/DeYoung Decl. at Para. 95) If AT&T feels that it takes time and costs extra money for its service representatives to re-enter data, perhaps that time and money should be invested in developing the parsing capability on its side of the interface, as it is capable of doing.

With that said, and even though BellSouth's current position has been supported by the FCC, an AT&T change request (TAG0812990003) for parsed CSRs is currently being processed within the CCP, which is the appropriate avenue and process for such a request. Because AT&T is trying to use this arbitration proceeding to gain a Commission ruling (thereby circumventing the CCP), mention of this change request has been conveniently avoided by Mr. Bradbury.

However, as I mentioned in my direct testimony on Page 65, there is a CCP sub-team devoted to processing this change request. The latest sub-team meeting was November 16, 2000, and I have provided the minutes of that meeting as Exhibit RMP-23. On December 12, 2000, an e-mail was sent by the CCP to participating CCP ALECs asking for comments on the work that had been done since the November 16,2000 meeting, and attached to that e-mail were the following documents: an updated Change Request, the November 16 Sub-Team Meeting minutes, the Parsed CSR Action Item Log, ALEC User Requirements, and a tentative Parsed CSR Implementation Timeline. Comments from the ALECs are due by January 10, 2001, and a conference call has been

scheduled for mid-January 2001 to review the project and the implementation timeline.

Sub-Part B) Electronic Ordering of All Services and Elements

Q. ON PAGES 74 & 75 OF HIS TESTIMONY, MR. BRADBURY CLAIMS THAT BELLSOUTH RETAIL UNITS CAN PLACE ELECTRONIC ORDERS FOR EVERY SERVICE AND PRODUCT THAT IT PROVIDES ITS CUSTOMERS. PLEASE COMMENT.

A. It is inappropriate to compare BellSouth's retail interfaces for submitting service requests for complex orders – which utilize a legacy system that is not compatible with the industry-standard LSR format – to that of an ALEC issuing a complex order via the LSR industry-standard format. The issue is one of translations of an LSR-formatted request to a format that can be accepted by BellSouth's Service Order Communications System ("SOCS") for provisioning by further downstream BellSouth OSS legacy systems. The interfaces utilized by BellSouth's retail units do not have to deal with this translations issue because the service requests are built in a SOCS-compatible format.

Mr. Bradbury's testimony also suggests that it is a simple matter for BellSouth to electronically input *any* order for a BellSouth retail customer, and that is not the case. While the ultimate electronic input for a BellSouth retail complex order may be the result of a "single employee" typing it, as

he states on Page 77, requests for complex services are actually the result of a team of employees working to develop the information necessary for that "single employee" to input the service request. That team might include the account team, system designers, network specialists and other subject matter experts required for input of information to the order. Once that team has done its collective work, and the BellSouth service representative has "gathered and arranged all of the information" (to quote Mr. Bradbury), it is then typically written on a paper service order form. It is from that form that a "single employee" inputs the order utilizing the Regional Ordering System ("ROS") interface, for example, for a business transaction. ROS then transmits the SOCS-compatible formatted order and distributes it to the downstream provisioning systems.

For ALECs placing a complex services request, the process is substantially similar. It is still a team effort, but involves ALEC personnel along with BellSouth account team representatives, system designers or other BellSouth subject matter experts. Once the order information has been "gathered and arranged" by the ALEC, it is then handed off via the LSR process to BellSouth's Local Carrier Service Center ("LCSC"). This process requires the ALEC to fill out an LSR for the requested service. It is from this LSR that the BellSouth LCSC representative inputs the request to the Direct Order Entry ("DOE") system. In other words, at that point, a "single employee" types the order into DOE, which in turn puts the information into a SOCS-compatible format, and distributes the order to

the same downstream service order and provisioning systems as does the BellSouth retail order process. This process provides ordering for ALECs in substantially the same time and manner as does the process for BellSouth retail units.

Q. MR. BRADBURY ALSO CLAIMS ON PAGE 75 THAT BELLSOUTH HAS CONTINUALLY REFUSED TO PROVIDE FULLY ELECTRONIC ORDERING CAPABILITY TO ALECS, THUS REDUCING THE ALECS' ABILITY TO COMPETE. HOW DO YOU RESPOND?

A. AT&T has not issued a change request asking for the electronic submission of all Local Service Requests ("LSRs"), so it is unclear to BellSouth how AT&T can say that BellSouth has continually refused that capability. Because BellSouth adheres to the guidelines of the CCP, BellSouth doesn't recognize a request for change to its OSS unless the formal request comes through the CCP.

I would also like to reiterate my statement from my direct testimony that nondiscriminatory access does not require that all LSRs be submitted electronically, and that BellSouth's processes are in compliance with the Telecommunications Act and the FCC rulings in that regard. AT&T's contention that the competitive ability of ALECs is compromised because all LSRs cannot be submitted electronically is unfounded and unsubstantiated.

Q. CAN YOU HELP PUT THIS ISSUE IN PERSPECTIVE BY DISCUSSING THE PERCENTAGE OF ORDERS THAT ARE SUBMITTED ELECTRONICALLY BY ALECS AS OPPOSED TO MANUAL SUBMISSIONS?

A. Yes. As a point of reference, in October 1999, a total of 214,641 Local Service Requests (LSRs) were processed by BellSouth. Of that total, 103,123 (48%) were submitted manually and 111,518 (52%) were submitted electronically. As of October 2000, one year later, LSR total submissions had grown by 84% to 393,795. However, in October 2000, only 12% (47,961 LSRs) were submitted manually and 88% (345,834 LSRs) were submitted electronically. The facts speak for themselves. The ALEC community as a whole has found the deployment of the electronic interfaces to be effective and the vast, vast majority of all orders are submitted electronically at this time. While everyone would like 100% of orders to be submitted electronically, because BellSouth's personnel have to be involved when an order is submitted manually, as well as the ALEC personnel, it is unreasonable to expect that every order will be electronically submitted anytime in the immediate future. Such a requirement would make no sense and should not be imposed on BellSouth.

Sub-Part C) Electronic Processing after Electronic Ordering without Subsequent Manual Processing by BellSouth Personnel

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON SUB PART C?

A. As I understand this issue, AT&T is requesting that all complete and correct LSRs submitted electronically flow through BellSouth systems without manual intervention.

Q. WHAT IS BELLSOUTH'S POSITION ON SUB PART C?

A. Nondiscriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without manual intervention.

Q. WHAT IS FLOW-THROUGH?

A. Flow-through for an ALEC LSR occurs when the complete and correct electronically-submitted LSR is sent via one of the ALEC ordering interfaces (EDI, TAG, RoboTAG, or LENS), flows through the mechanical edit checking and LESOG system, is mechanically transformed into a service order by LESOG, and is accepted by the Service Order Control System ("SOCS") without any human intervention.

Q. HAS ANY ALEC SUBMITTED A CHANGE REQUEST REGARDING THIS ISSUE TO THE CCP?

A. No. To BellSouth's knowledge, no such change request has been submitted to the CCP. As I have discussed previously, BellSouth's position is that OSS issues subject to the CCP are not appropriate for this arbitration. AT&T is attempting to avoid the CCP. All requests for enhancements to BellSouth's electronic and manual interfaces should be submitted via the CCP.

Q. IS IT FEASIBLE FOR LSRS FOR ALL COMPLEX SERVICES TO BE SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE BELLSOUTH SYSTEMS?

A. No. As I discussed in sub-part (B) of my direct testimony, many of BellSouth's retail services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. The orders at issue here are those that the ALEC may submit electronically, but fall out by design. In most cases these orders are complex orders. For certain orders, BellSouth has, for the ease of the ALEC, allowed them to be submitted electronically even though BellSouth then manually processes such orders. The specialized and complicated nature of complex services, together with their relatively low volume of orders as compared to basic exchange services, renders them less suitable for mechanization, whether for retail or resale applications. Complex, variable processes are difficult to mechanize, and BellSouth has

concluded that mechanizing many lower-volume complex retail services would be imprudent for its own retail operations, in that the benefits of mechanization would not justify the cost. Because the same manual processes are in place for both ALEC and BellSouth retail orders, the processes are competitively neutral, which is exactly what both the Act and the FCC require.

Q. DO COMPLEX ORDERS PROCESSED ON BEHALF OF BELLSOUTH REQUIRE MANUAL INTERVENTION?

A. Yes. As previously described in the case of service requests for complex services by ALEC or BellSouth end users, there are systems designers and consultants involved in the work flow between the ALEC or BellSouth representative who take the service request and the person who inputs the service order into the system. These designers and consultants clarify and expand on the information from the end user customer as necessary to prepare the order for input. Therefore, complex orders, even those that can be submitted electronically, do not flow through because there is significant manual intervention, the amount of which varies from order to order, between the time order information is taken by the ALEC or BellSouth representative and before the order is input.

Q. ARE THERE OTHER REASONS FOR ORDERS TO FALLOUT BY DESIGN THAN BEING A COMPLEX SERVICE?

A. Yes. There are appropriate categories other than complex services for an LSR to fallout by design for manual handling. All of these categories have been identified in the Service Quality Measurements Performance Reports document for the Percent Flow-Through Service Requests (Summary). The document can be found at the password-protected BellSouth Performance Measurements Report website (https://pmap.bellsouth.com/clec_specific_reports.cfm).

One situation for which it makes sense for LSRs to fall out by design is the result of the decision not to program the Local Exchange Service Order Generator ("LESOG") to handle certain capability in advance of standards, such as partial migrations for other than conversion as-is. It could also include order types of very low volume. Because special pricing plans are unique to each ALEC, no automatic service order generation is possible for such orders. Another example is when an ALEC (or BellSouth) submits a service request before the new telephone number for the end user has been posted to the billing system; in those situations, the request will appropriately fall out for manual handling.

Q. ON PAGES 81-87 MR. BRADBURY DISCUSSES THE ALLEGED IMPACT OF DESIGNED MANUAL FALL OUT AND BELLSOUTH-CAUSED SYSTEM FAILURES. DO YOU AGREE WITH HIS ASSESSMENT?

A. No. This is the part of his testimony where Mr. Bradbury purports to use numbers and figures to show the problems he asserts are raised by this issue. Unfortunately for him, Mr. Bradbury has presented an elaborate, but inconclusive approach utilizing regional flow-through data and it has led him to the wrong conclusion. More importantly, Mr. Bradbury has tried this in earlier versions of his testimony and I have previously pointed out that he does not have sufficient information to be able to reach the conclusions he wants to reach. Nevertheless, he continues to insist on including what can only charitably be called misleading information regarding this topic

To better understand BellSouth's performance one must "peel the onion" back and look at detail into the numbers and actual LSRs submitted. Mr. Bradbury's process does not do so. In all fairness, and I have said this in each jurisdiction where Mr. Bradbury insists on bringing his misleading and incomplete analysis up, I have to say that in order to be thorough, which Mr. Bradbury was not, one has to look at the actual data underlying the results that are reported. Mr. Bradbury obviously does not have

access to this data and it is appropriate that he does not since it involves information germane to other ALECs. Nevertheless, his conclusions based on incomplete data are wrong and misleading and that is why he should speak only to AT&T's experiences and supporting data if he wants to make comments in this area.

Q. DO YOU AGREE WITH MR. BRADBURY'S PRESENTATION OF THE DATA IN HIS ANALYSIS?

A. No. Mr. Bradbury has intentionally misrepresented the data for the month of September 2000 to more favorably reflect his point of view in what is already a faulty analysis process. Specifically, Mr. Bradbury has taken the data reflected in the report column for "Pending Supps" and added this to the data reflected in the report column for "Total Manual Fallout" and used this sum as the amount for Total Manual Fallout. Attached as Exhibit RMP-24 is the PERCENT FLOW-THROUGH SERVICE REQUESTS report for September 2000. This is commonly referred to as the 'flow-through' report and is made available publicly via BellSouth's performance measures website. Please refer to page 22 of this report. On this page you will note the summary information which as noted at the top of the page is for the 'BUSINESS DETAIL'. Now please compare this to Exhibit JMB-20 filed in Mr. Bradbury's direct testimony. On page 3 of Mr. Bradbury's exhibit the last 3 columns represents a snapshot of some of

the summary data from page 22 of the flow-through report. A comparison of the data is noted below.

	Exhibit JMB-20	Flow-through Report	Manual Fall Out
	LENS	2,207	1,856
	TAG	442	411
	EDI	727	657

The difference in the amounts can be found in the 'Pending Supps' column of the flow-through report. That column reflects the following:

	Pending Supps
LENS	351
TAG	31
EDI	70

Q. WHAT ARE 'PENDING SUPPS'?

A. Pending Supps is short for Pending Supplements. A Pending Supplement is the result of a LSR that has been submitted by an ALEC being changed (supplemented) by the ALEC prior to acceptance by BellSouth. It results in the initially submitted LSR going into a pending status as the mechanical systems have recognized the subsequent LSR submittal. The LSR in the pending status will eventually be mechanically deleted by the

system. These deleted LSRs are being categorized for purposes of flow-through as Pending Supps.

Q. HAS BELLSOUTH ALWAYS HAD THE CATEGORY 'PENDING SUPPS' ON THE FLOW-THROUGH REPORT?

A. No. This was a new category added with the September 2000 report.

Q. WHAT PROMPTED THIS CHANGE TO THE REPORT?

A. This is the result of an exception as part of the Third Party Testing being conducted in Georgia. KPMG[1] identified this as an exception during their reconciliation of the flow-through report. Initially these pending LSRs were being identified as an ALEC error. As a result of the KPMG Third Party Testing exception, BellSouth re-categorized these LSRs as a BellSouth caused error. However, KPMG did not agree with that categorization as it was felt these LSRs were not an error on the part of the ALEC or BellSouth. Instead, these LSRs are just a part of the process. So a new category (Pending Supps) was created to properly categorize the LSRs.

Q. SO THESE 'PENDING SUPPS' LSRS HAVE NEVER BEEN COUNTED AS PART OF 'TOTAL MANUAL FALLOUT' FOR FLOW-THROUGH?

[1] KPMG Consulting, LLC provides oversight of Third Party ordered by the Georgia Public Service Commission to determine whether BellSouth's provision of access to OSS functionality enables and supports CLEC entry into the local market.

A. That is correct. As I just described, these LSRs at one time were ALEC errors and then were re-categorized as BellSouth errors, but they have never been categorized as 'Manual Fallout'.

Q. WAS THIS CHANGE TO THE FLOW-THROUGH REPORT COMMUNICATED TO THE ALECS?

A. Yes. As previously stated, the monthly flow-through report is made available publicly to the ALECs via BellSouth's performance measures website. With the posting of this report in September, a notice of this change was also posted to the performance measures website.

Q. ARE THERE OTHER ISSUES WITH MR. BRADBURY'S ANALYSIS OF THE FLOW-THROUGH REPORT DATA?

A. Yes. Using September 2000 as an example, there were 256,381 LSRs [2] submitted electronically to BellSouth. To understand this data and the impact it has on flow-through, one must have a thorough understanding of the individual ALEC data comprising the total.

Q. CAN YOU ILLUSTRATE WHY LOOKING AT INDIVIDUAL ALEC DATA IS NECESSARY FOR A THOROUGH ANALYSIS AND UNDERSTANDING OF MR. BRADBURY'S EXAMPLE?

[2] PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL), September 2000 report at page 10, total reflected for "TOTAL INTERFACES" row in "Total Mech LSRs" column, Exhibit RMP-24.

A. Yes. For sake of illustration let us use the PERCENT FLOW-THROUGH SERVICE REQUESTS (BUSINESS DETAIL) report for September 2000. The specific report used for this discussion is attached as exhibit RMP-24. Pages 18 – 22 are the pages specific to the business flow-through report.

By conducting a detailed review of the report one can identify 136 users[3] of the LENS electronic interface based on the number of individual horizontal lines of data presented. There are also 6 users of the EDI interface and 12 users of the TAG interface. From further review it can be determined that there were 5 users of LENS that submitted 500 or more LSRs. I will refer to these as the five dominant users of LENS. For EDI there is only one dominant LSR volume user of EDI, and for TAG, there are three dominant LSR volume users. For LENS, the five dominant users submitted 3,990 LSRs. That accounted for 35% of the total business resale LSRs submitted and 44% of the volume for the LENS interface alone. For EDI, the one user submitted 1,191 LSRs. That accounted for 10% of the total business resale LSRs submitted and 98% of the volume for the EDI interface. For TAG, the dominant users submitted 955 LSRs. That accounted for 8% of the total resale business LSRs submitted and 90% of the volume for the TAG interface. The combination of these nine users represents 54% of the overall business resale LSR volume submitted via the electronic interfaces. This is over one-half of the electronic LSR business resale submissions.

[3] I have used the term 'user' instead of 'ALEC' when making reference to a horizontal line of data represented on the flow-through report. This is because each line of data represents an Operating Company Number ("OCN") and some ALECs have multiple OCNs. Thus, on the flow-through report two or more users may represent an ALEC's total data.

The data presented above is summarized in the following table.

	Total LSRs Electronically Submitted	Total Number of Users	Number of Dominant Users	LSRs Submitted by Dominant Users	Percent of LSRs by Electronic Interface	Percent of Total LSRs Electronically Submitted
LENS	9,168	136	5	3,990	44%	35%
EDI	1,221	6	1	1,191	98%	10%
TAG	1,056	12	3	955	90%	8%
Total	11,445	154	9	6,136	N/A	54%

Q. WHAT IS THE SIGNIFICANCE OF NINE USERS COMBINING FOR OVER ONE-HALF OF THE LSR BUSINESS RESALE VOLUME?

A. Obviously when such a large percentage of the volume comes from such a small number of the users, then the overall results for that area will be skewed by the performance of those few users. That is specifically the case for this situation.

Q. ARE THERE OTHER DATA WITH RESPECT TO THESE USERS THAT HAVE IMPACT ON THE OVERALL RESULTS?

A. Yes. These same nine users combine for 1,848 LSRs that fall out by design for manual processing. That represents 63% of the total manual fall out. For their respective electronic interfaces, the five users of LENS

account for 44% of the manual fall out for the LENS interface, the user of EDI accounts for 98% of the manual fall out for the EDI interface, and the three users of TAG account for 93% of the manual fall out for the TAG interface.

Q. IS THERE A SPECIFIC REASON THESE CERTAIN USERS ARE EXPERIENCING SUCH A HIGH MANUAL FALL OUT?

A. Yes. Once again the data is private and proprietary, but this fact goes to demonstrate how incomplete knowledge can lead to incorrect conclusions. Without identifying the users or providing any identifying or proprietary information, I can state that the majority of the manual fall out for two of the nine dominant users is the result of one particular service which they resell to their end users. I know this as I personally reviewed their situation for this analysis.

Q. HAS BELLSOUTH DONE ANYTHING TO THE FUNCTIONALITY OF THE ELECTRONIC INTERFACES SPECIFIC TO THE SERVICE IN QUESTION?

A. Yes. With the January 14, 2000 implementation of Release 6.0 of EDI and Releases 3.0 and 3.1 of TAG (available for System Readiness Testing on December 18, 1999), functionality was made available for this particular service to flow through BellSouth's systems. In other words, the service in question no longer falls out by design for manual handling.

Q. SINCE THESE RELEASES WERE IMPLEMENTED IN JANUARY 2000, WHY ARE THESE USERS STILL EXPERIENCING SUCH A RATE OF MANUAL FALL OUT?

A. This result is because these users have yet to implement these releases. The timing of release implementation is controlled by the ALEC based on its individual business needs and decisions. Obviously anyone reviewing the public data would not know this and therefore could draw the wrong conclusions from the public data, as Mr. Bradbury did, something I have pointed out to Mr. Bradbury previously. This points, of course, to the need to be careful what conclusions you draw from incomplete information.

Q. WOULD THERE BE ANY DIFFERENCE IN THE RESULTS BASED ON MR. BRADBURY'S PROCESS HAD THESE USERS IMPLEMENTED THE RELEASES?

A. Yes. The results would reflect a difference. To illustrate I have used a conservative figure of 50% of the manual fallout reflected in the flow-through just for these two users being able to flow through the systems. This is based on the assumption that these users implemented the Release 6.0 of EDI and Releases 3.0 and 3.1 of TAG. It also applies the assumption just as Mr. Bradbury did in his assessment that the users submitted service requests with absolutely no input errors. The results for the business resale for the EDI and TAG interfaces would change as

noted below. Note that I have changed the AT&T results for 'Manual Fall Out' to properly represent the numbers by subtracting the 'Pending Supps' LSRs for the reasons described earlier in my direct testimony.

	Assessment by AT&T		Assessment by BellSouth	
	TAG	EDI	TAG	EDI
Total Mechanized LSRs	1056	1221	1056	1221
Manual Fall Out	411	657	290	335
Validated LSRs	463	403	585	725
BellSouth-Caused System Failure	138	122	138	122
Flow-through/Issued SOs	299	240	421	562
% Manual Fallout – LSRs	39%	54%	27%	27%
% BellSouth System Failure – LSRs	13%	10%	13%	10%
% BellSouth System Failure – VLSRs	30%	30%	24%	17%
% Total BellSouth Fallout + Failure LSRs	52%	64%	41%	37%
% Max. One-Touch ALEC Orders	45%	30%	57%	57%

Once again, this chart is for illustrative purposes only to show the impact of a failure to properly analyze the relevant data. As I stated above, this chart represents the impact of LSRs submitted by only two ALECs. This

chart is in no way indicative of the actual September 2000 flow-through results.

Q. WHAT IMPACT WOULD THE ABOVE ILLUSTRATION HAVE ON THE BUSINESS RESALE FLOW-THROUGH RESULTS AS REPORTED BY BELLSOUTH FOR SEPTEMBER 2000?

A. For EDI business resale, the results would have improved to 82.2% from the currently reported result of 66.3%. For TAG, the result would have improved to 75.3% from the currently reported 68.4%.

Q. ARE THERE OTHER DATA THAT INFLUENCES THE FLOW-THROUGH RESULTS THAT MR. BRADBURY DID NOT CONSIDER FOR HIS ANALYSIS?

A. Yes. The above reflects the impact on only one area – business resale flow-through. Even for this one area in my analysis, I gave no consideration to the few ALECs that dominate the LSR volume submitted via the LENS interface. As previously stated, there are five (5) users of the LENS interface that contribute to 35% of the total LSR submissions for business resale and another 28% of the total manual fallout. These five users represent 44% of the LENS business resale volume and 44% of the LENS manual fallout. One can combine these five with the one dominant user of EDI and the three dominant users of TAG discussed earlier and easily conclude that 9 of 154 users (6% of the users) of electronic

interfaces drive the flow-through results. Once again, these 9 combined for business resale LSRs that accounted for one half (54%) of the volume submitted during the month of September 2000. If further analysis of these five LENS users and the other two users of TAG were conducted, it would obviously impact the results further from what I have previously presented. Similar correlation can be made to the UNE and LNP flow-through reports, as there were forty-nine (49) users of the electronic interfaces for UNE LSRs and nineteen (19) for LNP in September 2000. One user accounted for 71% of the UNE LSR submissions and two users accounted for 77% of the LNP LSR submissions.

Q. PLEASE SUMMARIZE CONCLUSIONS FROM YOUR ASSESSMENT.

A. A small number of ALECs are the dominant volume users of the electronic interfaces. Therefore, the flow-through results of these few ALECs skew the overall results. If these ALECs do not implement the latest software in which BellSouth has implemented the ALEC-requested features, the overall results will not properly represent the current state of functionality capabilities existing for the electronic interfaces. That is the situation that exists today.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 31.

A. I will summarize Issue 31 as follows:

1) Issue 31 is not appropriate for this arbitration.

2) A Change Request is pending in the CCP for a sub-parsed CSR. This is an active element before the CCP and will be resolved there.

3) Nondiscriminatory access does not require that all LSRs be submitted electronically. Some of BellSouth's services, primarily complex services, require involve manual handling.

4) BellSouth is providing nondiscriminatory access for ALECs to its OSS functions. Nondiscriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without manual intervention.

Issue 32: Should BellSouth provide AT&T with the ability to access, via EBI/ECTA, the full functionality available to BellSouth from TAFI and WFA?

Q. ON PAGE 94, MR. BRADBURY STATED THAT "FOR MANY (BUT NOT ALL) SERVICES ASSOCIATED WITH A TELEPHONE NUMBER, BELLSOUTH OFFERS ACCESS TO ITS PROPRIETARY TROUBLE ANALYSIS FACILITATION INTERFACE (TAFI)". DO YOU AGREE?

A. No. The ALEC can use TAFI to enter a trouble report for ALL telephone number- (TN) based services. The objective of TAFI is to 'screen' (test, analyze, repair or route) each trouble report before entering the report into the LMOS. As pointed out in Section 3.2 (Limitations) of the CLEC-TAFI User Guide (Issue 5), there are a few TN-based services that TAFI does

not screen. However, the user can still enter the report and manually route it to a Maintenance Administrator for screening. This functionality is exactly the same for the version of TAFI used by BellSouth's retail units. (Note: Section 3.2.1 of the Guide indicates that stand-alone UNE ports are not supported in TAFI. This item is now inventoried in LMOS and supported by TAFI, and the next issue of the Guide will remove this statement.)

Q. ON PAGE 95, MR. BRADBURY PRESENTS HIS ARGUMENT THAT NEITHER TAFI NOR ECTA PROVIDES NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OSS FOR MAINTENANCE AND REPAIR. DO YOU AGREE WITH HIS ASSESSMENT?

A. No. The Telecommunications Act requires ILECs to provide ALECs with the ability to enter trouble reports into the ILECs' OSS in substantially the same time and manner as is enjoyed by the ILECs' personnel entering trouble reports into the OSS. Thus, 'same time' equates to response time, and 'same manner' equates to access to the same functionality. The response time and functionality of CLEC-TAFI is the same as the version of TAFI used by BellSouth's retail units. (Actually the CLEC-TAFI functionality is superior to BellSouth's TAFI since it can process both Residence and Business trouble reports on the same processor.)

Therefore, CLEC-TAFI provides nondiscriminatory access to BellSouth's OSSs.

BellSouth also supports interfaces built to National standards and for Maintenance and Repair functions, this interface is ECTA. The functionality of ECTA is limited by the National standards to providing the ALEC the ability to: (1) enter a trouble report; (2) modify an existing trouble report; (3) close an existing trouble report; (4) obtain trouble report status information; and, (5) obtain mechanized loop test ("MLT") data on a line without entering a trouble report. BellSouth does not use ECTA internally to submit trouble reports to its OSSs so there is not an analogous BellSouth retail process for comparison of the response time and functionality. However, the response time and functionality of ECTA are clearly defined in the ECTA Joint Implementation Agreement (JIA) which is agreed to by each ALEC using ECTA. (AT&T agreed to and signed an ECTA JIA in 1997.) The current "boiler plate" JIA is available on the web at http://www.interconnection.bellsouth.com/guides/clec_ar.html.

Mr. Bradbury contends that "when an ALEC submits a trouble report via TAFI, that order must be manually entered into the ALEC's own internal OSS". Please note that the Telecommunications Act does not require the ALEC to enter a report into its own OSS. It only addresses the ILECs'

responsibility of providing nondiscriminatory access to its OSS. Therefore, performing "costly and error-prone double entry" (for trouble reports) is a business decision of the ALEC and is not a requirement of the Telecommunications Act. Hence, this does not impact the definition of nondiscriminatory access.

Q. IN YOUR PREVIOUS ANSWER, YOU INDICATED THAT ECTA IS BUILT TO NATIONAL STANDARDS. WHO DEFINES THESE NATIONAL STANDARDS TO INSURE THAT THE NEEDS OF THE ALECS ARE ADDRESSED?

A. ECTA is built to the American National Standards Institute's (ANSI) standards. The Electronic Communications Implementation Committee (ECIC) developed these standards. The ECIC is a subcommittee of the Telecommunications Industry Forum ("TCIF"), which was established to foster the implementation of electronic communications, particularly with regard to trouble administration. AT&T and BellSouth (along with most ILECs and interested ALECs) have active participation in ECIC activities including the establishment of new standards. Therefore, through ECIC, ALECs have the ability to define ECTA functionality.

Q. ON PAGE 96, MR. BRADBURY INDICATED THAT "ALEC'S CANNOT INTEGRATE TAFI WITH THEIR OWN 'BACK OFFICE' SYSTEMS AS BELLSOUTH DOES". IS HE CORRECT?

A. No. TAFI cannot be integrated for either user community. TAFI is a front-end human-to-machine user interface that obtains data from various OSSs in order to test, analyze, repair or route a given trouble report. BellSouth's OSSs are not dependent upon TAFI for their operation. If TAFI were pulled from the infrastructure, the remaining systems (i.e., LMOS, CRIS, Predictor, MARCH) would work fine. Therefore, TAFI is not integrated with these systems – it only accesses these systems.

Once the proper determination is made, TAFI enters the trouble report into LMOS for subsequent processing. (If the trouble condition was resolved, TAFI would enter, and then close, the LMOS report.) This is true regardless of the party that generated the trouble report – the ALEC or BellSouth. Although LMOS is BellSouth's maintenance OSS, ALECs using TAFI have the ability to view LMOS trouble status and LMOS trouble history data for specific end-users just like BellSouth users can. The argument for double-entry was addressed earlier and remains moot.

The statement made by BellSouth in the Louisiana 271 application before the FCC was misinterpreted by AT&T. The statement "BellSouth

concedes that it derives superior integration capabilities from TAFI" means that TAFI obtains data from various OSSs for a given trouble condition and then mechanically integrates this information to form the analysis determining the correct course of action to effect a repair. TAFI's capability of "automatically interacting with other systems as appropriate" is correct for both CLEC-TAFI and the version of TAFI used by BellSouth's retail units. This statement just means that TAFI obtains data from the appropriate OSSs for a given trouble condition. For example, if the customer were reporting no dial tone, TAFI would execute an MLT to check the line. For this report, TAFI would not verify features programmed in the central office switch. On the other hand, if the customer indicated that their Call Waiting feature didn't work, TAFI would not execute an MLT.

Q. ON PAGE 97, MR. BRADBURY PROVIDES HIS ARGUMENTS FOR A 'FULL FUNCTION MACHINE-TO-MACHINE MAINTENANCE AND REPAIR INTERFACE'. WHAT COMMENTS DO YOU HAVE?

A. Mr. Bradbury says, "if an ALEC wants to issue credits to a customer who had experienced recurring repairs, it would need access to billing data and repair histories." BellSouth's OSSs only track what items were sold to the ALECs and not what the ALEC sold to their end user and for what price. Therefore, the ALEC must rely on its own billing system. Trouble history data has been available via TAFI since its introduction. (Note: ECIC is

currently evaluating a methodology for obtaining Trouble History data over ECTA. Once the standard is approved, BellSouth will deploy it if requested to do so by those ALECs using the interface.)

Mr. Bradbury further states on Page 97 that "ALECs must be able to add or change service and adjust calling plans for customers, and require access to customer service record information to keep contact information up-to-date." Adding or changing service is the result of provisioning initiated by the submission of a service request, which is part of the ordering process. Accessing customer service record data is available via the pre-ordering process. Both pre-ordering and ordering functions are mechanically available via the machine-to-machine electronic interface called Telecommunications Access Gateway ("TAG").

Using Mr. Bradbury's numbers from Page 98, 30 months after market entry (and using a 6%-per-month trouble rate), 60,000 repair calls per month indicates an installed base of 1,000,000 lines for AT&T in BellSouth's area. As information, BellSouth's retail units process between 1.5 and 2.0 *million* TAFI reports per month with no problems.

To avoid the 'double-entry' problem to which Mr. Bradbury keeps referring, AT&T could re-establish their use of ECTA and enjoy the functionality provided by the National Standards. As information, AT&T was the first

ALEC to build an interface to BellSouth's ECTA system. That interface went into production on March 18, 1998. On April 9, 1998 (three weeks later), AT&T suspended the service.

Q. ON PAGE 99, MR. BRADBURY RECOUNTS AT&T'S "NUMEROUS" REQUESTS FOR BELLSOUTH TO PROVIDE FULL TAFI FUNCTIONALITY OVER THE ECTA INTERFACE. PLEASE PROVIDE YOUR COMMENTS ON THIS TOPIC.

A. AT&T requested that BellSouth provide full TAFI functionality via the ECTA interface on numerous occasions. BellSouth agrees that providing enhanced functionality via a machine-to-machine interface would be attractive to the ALEC community. However, ECTA is not the vehicle to deliver this functionality since it adheres to the National standards for exchanging maintenance and repair information – and these standards do not support all of the data elements required (A 'data element' is defined as a specific field of information in a data transmission. For example, ANSI standard 262 defines the methodology for obtaining results of a mechanized loop test, and the corresponding string of data bits containing those results is the MLT data element.). In addition, the standards do not provide a vehicle for BellSouth to deliver the interactive dialogue and analysis rules required for TAFI functionality.

Also on Page 99, Mr. Bradbury misrepresents issues regarding the Georgia PSC Order, Docket No. 6352U (July 2, 1996). At line 14, he says, "BellSouth stated that it 'has investigated the possibility of adding to the existing [EBI] gateway a system called TAFI'". What BellSouth actually said was that it had investigated the possibility of adding its internally developed and proprietary system called TAFI to the list of interfaces available to ALECs to report their end-user trouble reports. At that time, BellSouth did not have the ECTA maintenance and repair interfaces available for ALECs. However, special development work would have to be done to TAFI (i.e., ensuring that a given ALEC could only access records pertaining to their customers, etc.) before it could be made available to the ALEC community. Beginning at line 17, he further states that the "Georgia PSC ordered BellSouth to complete 'the TAFI enhancements to allow full operation of the required access by March 31, 1967'". While BellSouth thinks Mr. Bradbury meant 1997, this order was to make TAFI available to ALECs and **not** to put TAFI functionality into ECTA. BellSouth satisfied this Georgia PSC order on March 28, 1997 when the first ALEC generated a trouble report via CLEC-TAFI.

On page 100, Mr. Bradbury refers to a comment made by BellSouth's Mr. William Stacy where Mr. Stacy stated that "BellSouth could provide initial functionality in 13 months and complete functionality in 18 months". What Mr. Stacy was referring to was a non-standard arrangement to develop

and deliver 'TAFI-like' functionality over a machine-to-machine interface – **not** that BellSouth could provide this functionality over the existing ECTA interface. If AT&T wanted to pursue such an interface, then AT&T would have to submit a BonaFide Request ("BFR"). Nearly two years after Mr. Stacy's comment, AT&T has not submitted a BFR (for which it would have to pay, by the way) and, therefore, BellSouth has not pursued its development.

On page 101, Mr. Bradbury states that "AT&T submitted a formal change request through the Interim Change Control Process on April 18, 2000, asking for TAFI functionality via the ECTA interface". BellSouth replied to this request on June 29, 2000 (Exhibit RMP-25) and explained in detail why it was not possible to implement this request.

Q. STARTING ON PAGE 101, MR. BRADBURY PROVIDES HIS COMMENTS REGARDING AN INFORMAL PRESENTATION MADE BY BELLSOUTH AT THE OCTOBER 25, 2000 CHANGE CONTROL STATUS MEETING. PLEASE PROVIDE YOUR COMMENTS.

A. Mr. Piatkowski (BellSouth) used this forum to share the status of several development initiatives that *may* someday have an impact on the ALEC community. The intent was to provide the audience with a preview of what *may* become available. As stated by Mr. Bradbury, Mr. Piatkowski discussed three systems: DLEC-TAFI, CPSS-TA and E-Repair. Mr. Piatkowski was very deliberate in his presentation to state that BellSouth

was developing CPSS-TA and E-Repair for the non-ALEC user communities and that these systems *may* be extended to support the ALEC community in the future. DLEC-TAFI was specifically developed for the Data Local Exchange Carrier (DLEC) community that uses the line-sharing technique for delivering access to high-speed data transmission.

Mr. Bradbury's comments on lines 17 through 22 on page 101 are incorrect. DLEC-TAFI is not a unique system. It is an enhancement to the CLEC-TAFI system. By definition, a DLEC is a type of ALEC that provides high-speed data through the line-sharing methodology. This CLEC-TAFI enhancement **does not** support BellSouth's retail ADSL product line **nor** does it support ALEC xDSL trouble reports. There has **never been** a retail version "available to BellSouth for some time but is only now being demonstrated to A/DLECs." This CLEC-TAFI enhancement was developed at the request of the DLEC Collaborative - a group of DLECs working with BellSouth on line-sharing.

Mr. Bradbury's comments regarding CPSS-TA (the Circuit Provisioning Status System – Trouble Administration) on page 102 are correct. The interexchange carrier user pilot was successful and BellSouth has targeted an offering for CPSS-TA to the ALEC community during the first quarter of 2001.

The future evolution of E-Repair is unknown at this time. Mr. Piatkowski indicated that the initial version of this system – built for BellSouth's large

retail customers – would only provide a view of trouble-report status information (from both LMOS and WFA) via the Internet. The pilot for this initial system, using several select retail customers, is scheduled to begin in January 2001. The results of this trial will determine its future. Assuming that the trial is successful and E-Repair becomes a viable product, ALECs would have access.

The E-Repair developers are looking at the possibly of expanding the functionality of the system to include trouble entry. If this effort is approved (and funded), it would be a "Phase-II" initiative. Since E-Repair accesses both LMOS and WFA, and **if** BellSouth expanded its functionality to include trouble entry, then it would be logical to migrate CLEC-TAFI and CPSS-TA users to a single system. However, there are no firm plans for E-Repair beyond the initial pilot.

Q. ON PAGE 103, MR. BRADBURY EXPRESSES SOME CONCERN OVER THE PROCESS USED TO DEVELOP DLEC TAFI, CPSS-TA AND E-REPAIR. WHAT COMMENTS DO YOU HAVE?

A. As Mr. Piatkowski pointed out, the CPSS-TA and E-Repair initiatives were developed for non-ALEC user communities and, therefore, the development of those systems are not subject to the (ALEC) Change Control Process. When – and if – these systems are made available to ALECs, ALECs will certainly have the ability to submit suggestions for the system's evolution.

The DLEC enhancements to TAFI were developed at the request of DLECs participating in the DLEC Collaborative meetings at BellSouth. The DLEC Collaborative is an ad hoc subcommittee of the CCP. The participating DLECs are also members of the CCP, and had no issue with this development taking place within the DLEC Collaborative. In fact, Mr. Piatkowski's presentation to the CCP was in keeping with BellSouth's intent to keep the CCP informed of developments in the DLEC Collaborative project.

I must take exception to Mr. Bradbury's comment at line 10 on page 103 – "As I explained above, AT&T has a long-standing request for a full-function maintenance and repair interface, and has been negotiating in good faith with BellSouth regarding this issue for over a year, yet BellSouth failed to raise these projects as a possible solution." AT&T has been requesting that BellSouth provide "TAFI Functionality" via the machine-to-machine interface ECTA. On numerous occasions, the latest being the denial of Change Control Request CR0012 (Exhibit RMP-25), BellSouth has explained to AT&T that the ECTA architecture, built to the National standards, is not compatible with 'TAFI functionality'. BellSouth has also told AT&T that we would be happy to design and build a **non-standard** machine-to-machine maintenance and repair interface for them. However, AT&T has failed to submit the required BFR to initiate this effort, presumably because AT&T doesn't want to pay for such a system.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 32.

A. BellSouth provides ALECs nondiscriminatory access to maintenance and repair functionality through the CLEC-TAFI and ECTA interfaces, as well as available manual processes. BellSouth is in compliance with the Telecommunications Act and is not required to provide any additional maintenance and repair interfaces. If AT&T desires a non-industry standard integrateable machine-to-machine interface that will provide TAFI functionality, then AT&T should submit a BFR and pay for the design and development of such an interface.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-19

This sheet transmits the

Draft Contract Language for 3 Options for OS/DA

which consists of 7 pages.

Proposed Contract Language addition for AT&T:

3.20 Procedures for Selective Carrier Routing.

3.20.1 In order for BellSouth to provide unbranded BellSouth Operator Services (Operator Assistance and Directory Assistance), two options may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; or (2) Selective Carrier Routing using a Line Class Code platform.

3.20.2 Selective Carrier Routing using a Line Class Code platform routes AT&T's end user traffic to a Trunk Group by uniquely identifying AT&T's end users in BellSouth's central office and routing those calls to an Unbranded (?) Trunk Group installed by BellSouth. (BellSouth shall program the Line Class Codes requested by AT&T in the central offices identified by AT&T. The Line Class Codes shall uniquely identify the call blocking restrictions and classes of service AT&T to offers its end users. In addition to the end user attributes that Line Class Codes identify, line class codes are used to further the BellSouth central office from which AT&T offers end users service. If AT&T utilizes NPAs or NXXs associated with other BellSouth rate centers to provide end user service from a particular central office, additional line class codes are required to appropriately identify and route AT&T's end users.

3.20.3 Line Class Codes are ordered through AT&T's Account Team. AT&T shall submit a written request identifying the BellSouth central offices where it would like to offer service; end user call blocking restrictions and classes of services to be offered by the CLEC; and a forecast of call volumes for each central office. BellSouth will verify the Line Class Code capacity for the central offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth Account Team will provide AT&T with a response regarding whether the Line Class Code request can be satisfied~~.~~.

3.20.4 If line class code capacity exists within the central offices identified by the AT&T, the BellSouth Account Team will order the required Unbranded (?)Trunk Group for each TOPS Tandem. The interval for the provision of the trunk groups shall be approximately 45 calendar days from the receipt of the completed form for each TOPS Tandem, the number of trunk groups needed (based on forecast information from AT&T) may affect the timeframe. A separate trunk group is required for Operator Assistance and Directory Assistance. The trunk groups must be installed prior to the programming of the line class codes in each central office. The

Account Team must also submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The Account Team may need to request additional information from AT&T to complete these documents. Once the Line Class Code Administrator receives the completed forms, the Provisioning group will build the requested line class codes.

3.20.4 The line class codes may be built simultaneously with the installation of the Unbranded Trunk groups. Once the Unbranded trunk groups have been installed and the line class codes have been built, the Translations Group will translate the line class codes and point them to the appropriate trunk group for all central offices served by each TOPS Tandem. The process takes approximately 45 calendar days. Testing will be done once all of the Unbranded Trunk Groups have been installed. The testing interval is approximately 15 days.

3.20.5 The rates for Line Class Codes are listed in Exhibit A of this Attachment. These charges are non-recurring costs to build and program the line class codes in the central office for each serving TOPS Tandem

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

Proposed Contract Language addition for AT&T:

3.21 Procedures for Selective Carrier Routing.

3.21.1 In order for BellSouth to provide Branded BellSouth Operator Services (Operator Assistance and Directory Assistance), two options may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; or (2) Selective Carrier Routing using a Line Class Code platform.

3.21.2 Selective Carrier Routing using a Line Class Code platform routes AT&T's end user traffic, where BellSouth is providing the local switching, to a Trunk Group by uniquely identifying such end users in BellSouth's central office and routing those calls to a Custom Branded Trunk Group. Custom Branding requires AT&T to order dedicated trunks from the desired BellSouth end office to the BellSouth TOPS tandem (switch). The AT&T end user will be routed to the Custom Branded Trunk Group based on the line class code for its end user that is currently handled by the Selective Carrier Routing using line class codes. BellSouth shall program the Line Class Codes requested by AT&T in the central offices identified by AT&T. The Line Class Codes shall uniquely identify the call blocking restrictions and classes of service AT&T offers its end users. In addition to the end user attributes that Line Class Codes identify, line class codes are used to further identify the BellSouth central office from which AT&T offers end users service. If AT&T utilizes NPAs or NXXs associated with other BellSouth rate centers to provide end user service from a particular central office, additional line class codes are required to appropriately identify and route AT&T's end users.

3.21.3 Line Class Codes are ordered through AT&T's Account Team. AT&T shall submit a written request identifying the BellSouth central offices where it would like to offer service; end user call blocking restrictions and classes of services to be offered by the CLEC; and a forecast of call volumes for each central office. BellSouth will verify the Line Class Code capacity for the central offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth Account Team will provide AT&T with a response regarding whether the Line Class Code request can be satisfied.

3.20.4 If line class code capacity exists within the central offices identified by AT&T, AT&T will order the required dedicated trunks for the Custom Branded Trunk Group for each TOPS Tandem. A separate trunk group is required for Operator Assistance and Directory

Assistance. The trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team must also submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The AT&T Account Team may need to request additional information from AT&T to complete these documents. The interval for this process is 30 days for up to 20 line class codes per end office, and the Account Team working with AT&T to determine with AT&T how they want the end offices implemented. If there is more than one end office, there maybe be a Project Manager assigned to ensure timely and accurate implementation. Additionally, AT&T will also complete the CLEC Branding Questionnaire and shall fax the Questionnaire to the fax number identified on the questionnaire.

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

3.21.5 Custom Branding for Directory Assistance is not available for certain classes of service, such as: Hotel/Motel, WATS, cellular type 1, and certain PBX services.

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

Proposed Contract Language addition for AT&T:

3.20 Procedures for Selective Carrier Routing.

3.20.1 In order for BellSouth to provide branded or unbranded BellSouth Operator Services (Operator Assistance and Directory Assistance), two options may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; or (2) Selective Carrier Routing using a Line Class Code platform. Custom Branding for Directory Assistance is not available for certain classes of service, such as: Hotel/Motel, WATS, cellular type 1, and certain PBX services.

3.20.2 Where BellSouth is providing branded BellSouth Operator Services through selective carrier routing using a line class code platform and where BellSouth is providing the local switching, AT&T's end user traffic is routed to a dedicated trunk group by uniquely identifying by line class codes such end users in BellSouth's central office. AT&T shall order the dedicated trunks from the desired BellSouth end office to the BellSouth TOPS tandem (switch).

3.20.2 Where BellSouth is providing unbranded BellSouth Operator Services through selective carrier routing using a line class code platform, AT&T's end user traffic is routed to a trunk group installed by BellSouth.

3.20.3 Where AT&T is utilizing an Alternative Operator Services Provider through selective carrier routing using a line class code platform and where BellSouth is providing the local switching, AT&T's end user traffic is routed to a dedicated trunk group, which will be provisioned in accordance with BellSouth's and the Alternate Operator Service Provider's requirements, from the desired BellSouth End Offices to the Alternative Operator Services Point of Interface.

3.20.4 BellSouth shall program the Line Class Codes requested by AT&T in the central offices identified by AT&T. The line class codes shall uniquely identify each set of the call blocking restrictions and each class of service AT&T offers its end users. In addition to the end user attributes that line class codes identify, line class codes are used to further identify the BellSouth central office from which AT&T offers end users service. As such, if AT&T utilizes NPAs or NXXs associated with other BellSouth rate centers to provide end user service from a particular central office, additional line class codes are required to appropriately identify and route AT&T's end users.

3.20.5 Line Class Codes shall be ordered through AT&T's Account Team. AT&T shall submit a written request identifying the BellSouth central offices where it would like to offer end user service; each set of end user call blocking restrictions and each class of service to be offered by AT&T; and a forecast of call volumes for each central office. BellSouth will verify the Line Class Code capacity for the

central offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth Account Team will provide AT&T with a response regarding whether the Line Class Code request can be satisfied.

3.20.6 If line class code capacity exists within the central offices identified by the AT&T, and AT&T has requested branded BellSouth Operator Services, AT&T will order the required dedicated trunks from the desired BellSouth end office to the BellSouth TOPs Tandem. A separate trunk group is required for Operator Assistance and Directory Assistance. The trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The AT&T Account Team may need additional information from AT&T to complete these documents and AT&T shall provide such information in a timely manner. The interval for this process is 30 days for up to 20 line class codes per end office, and the Account Team work shall work with AT&T to determine in what order AT&T wants the end offices implemented. If there is more than one end office, there may be a Project Manager assigned to ensure timely and accurate implementation. Additionally, AT&T shall also complete the CLEC Branding Questionnaire and shall fax the Questionnaire to the fax number identified on the questionnaire.

3.20.7 If line class code capacity exists within the central offices identified by AT&T, BellSouth shall order the trunk groups utilized to carry the unbranded Operator Services traffic to each TOPs tandem. The interval for the installation of the trunk groups shall be approximately 45 calendar days from the receipt of the completed form for each TOPs tandem. The number of trunk groups required which shall be based upon a forecast of traffic volume received from AT&T may affect the provisioning interval and, if so, AT&T shall be notified. A separate trunk group shall be required for Operator Assistance and for Directory Assistance. Trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall also submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator. The Account Team may need additional information from AT&T to complete these documents and AT&T shall provide said information in a timely manner.

3.20.8 If line class code capacity exist within the central offices identified by AT&T, and AT&T has selected an Alternate Operator Services Provider, AT&T shall order the required dedicated Trunks from the desired BellSouth end offices to the Alternative Operator Services Provider Point of Interface. The trunk groups must be installed prior to the programming of the line class codes in each central office. The Account Team shall submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator.

3.20.8 Where BellSouth is providing Unbranded Operator Services, the line class codes may be built simultaneously with the installation of the trunk groups. Once the trunk groups are installed and the line class codes built, BellSouth Translations will translate the line class codes and point said codes to the appropriate trunk groups. The process shall take approximately 45 calendar days. Testing shall be conducted after all work activities have been completed and shall take approximately 15 calendar days.

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

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

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

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-20

This sheet transmits the

AT&T-Specific OS/DA User Requirements

which consists of 16 pages.

Entire Document is Proprietary.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-21

This sheet transmits the

Carrier Notification Letter SN91082004

which consists of 2 pages.

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91082004

Date: November 22, 2000

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECs - **REVISED** – Electronic Interface Release 8.0 and Associated Downtime (Originally released October 17, 2000)

This is to advise that Release 8.0 of the electronic interface systems was implemented on November 18, 2000. However, due to technical difficulties, some features have been deferred to a future release. The scope of the features released on November 18, 2000, and the deferred features are detailed below:

The scope of the features released on November 18, 2000

ALL Users:

- The non-resale Uniform Service Order Codes (USOCs) EMP1S and EMP1X (Equipment Maintenance Plan and associated credit) will automatically be stripped on REQTYP E and M, ACT of V, W, Q, and P.
- A production defect affecting REQTYP JB, ACTTYP A Local Service Requests (LSRs) has been corrected.
- A production defect causing auto-clarification messages on conversion from Port/Loop combinations to Resale Flat-Rate Business Line has been corrected.

LENS Users:

- Ability to submit Loop Makeup Queries from Local Exchange Navigation System (LENS) Inquiry Screen as previously implemented in 7.0 beta test environment will now be made available in production.

TAG Users:

- Ability to submit Loop Makeup Queries as previously implemented in 7.0 beta test environment will now be available for TAG in product.

The ability to control branding on Operator Assistance and Directory Assistance using specific Line Class Codes (LCC) was implemented for AT&T in Georgia. Other CLECs interested in this capability should contact their account team representative.

Due to technical difficulties, the following features have been deferred to a future Electronic Interface Release 8.0.1.

LENS Users:

- Features/Services section of Line Details screen will be updated to say "Number of Features to Add/Change/Delete", versus "Number of Features to Add."
- Implement ability to change Class of Service on REQTYP E change activity (ACT C) orders. (This does not allow users the ability to change from Business to Residence, or vice versa.)

TAG Users:

- TAG Release 7.5 will be implemented. This will be a server and Application Program Interface (API) change.
- Direct Inward Dial (DID) functionality (REQTYP N) will be implemented.

Should you have any questions, please contact your BellSouth account team representative.

Sincerely,

ORIGINAL SIGNED BY JIM BRINKLEY

Jim Brinkley – Senior Director
BellSouth Interconnection Services

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-22

This sheet transmits the

CCP Document, Version 2.0 with BellSouth's Proposed Changes

BELLSOUTH

CHANGE CONTROL PROCESS

CCP8_23.DOC

VERSION 2.0

~~AUGUST 23~~OCTOBER 27, 2000

DECEMBER 5, 2000

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

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

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

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

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

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

VERSION CHANGE HISTORY

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

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1 Section 8 Section 11	- Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1	- Added "testing" under process changes

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

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

1.0 INTRODUCTION

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

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

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

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

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

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, training materials and job aids)(BellSouth cannot support)
- Defects/Expedites

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

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

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation

~~Testing Support (i.e. negotiating/coordinating test agreements and dates)~~(Agree to remove)

- ~~Issue Resolution/Questions (i.e. questions associated with interface functionality, interpreting documentation)~~(Agree to remove)
- Coordination of test agreements will continue to be supported by the Account Team(Agree to accept)
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a Change Request should be submitted to the Change Control Team.(Agree to accept)

- Change Requests of this nature will be handled through existing BellSouth processes.(Revised and accepted above)

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

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

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

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

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

http://www.interconnection.bellsouth.com/
Select "Local Exchange Carriers"
Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

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

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

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

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

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

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

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

3.0 CHANGE CONTROL DECISION PROCESS

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

Type 1 – System Outage

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

Type 2 – Regulatory Change.

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

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part3. (Does not apply to Expedited Feature process)

Type 4 – BellSouth Initiated Change.

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

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

Type 5 – CLEC Initiated Change.

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

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

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

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

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

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

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

Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

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

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

Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

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

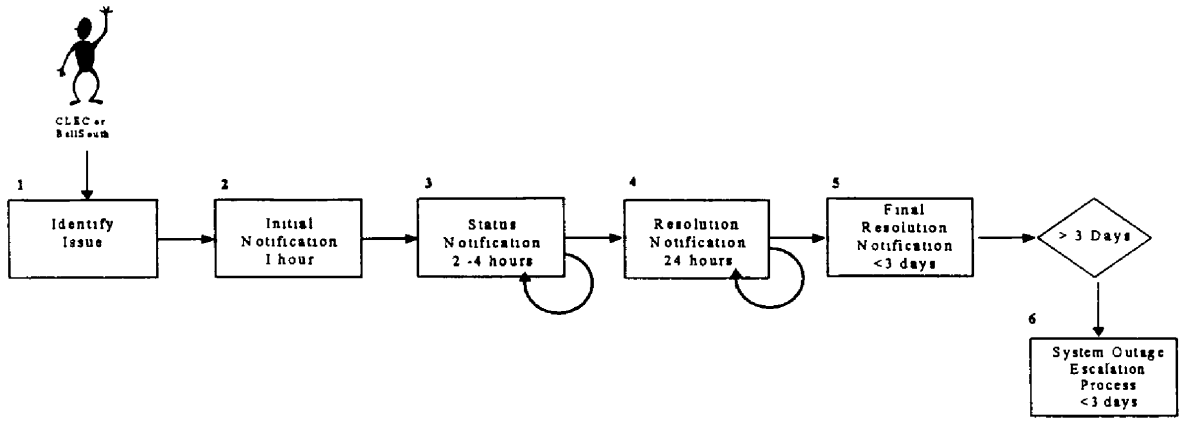

Figure: 4-2. Type 1 Process Flow

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

Table 4-1. Type 1 Cycle Times

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

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

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

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	**IDENTIFY ISSUE:** 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number and record and track the outage. 4. ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the outage.	**INPUTS:** • Issue Characteristics • Call to ECS Helpdesk **OUTPUTS:** • Recorded Outage	N/A
2	ECS	**INITIAL NOTIFICATION:** 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. 2. The CLEC initiating the Type 1 System Outage will need to be ~~available for communications on an~~	**INPUTS:** • Recorded Outage **OUTPUTS:** • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		available for communications on an as needed basis. 3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		will be sent to CLECs via e-mail and posted to the web.
3	ECS	**STATUS NOTIFICATION:** **(ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	ECS CCCM	**RESOLUTION NOTIFICATION:** **(ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect/expedite, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".		
5	ECS	**FINAL RESOLUTION NOTIFICATION:** 1. The final resolution notification is posted on the Web.	**INPUTS:** • Final Resolution Information **OUTPUTS:** • Final Resolution Notification	< 3 days
6	CCCM ECS	**ESCALATION** 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 - Systems Outage **OUTPUTS:** • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

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

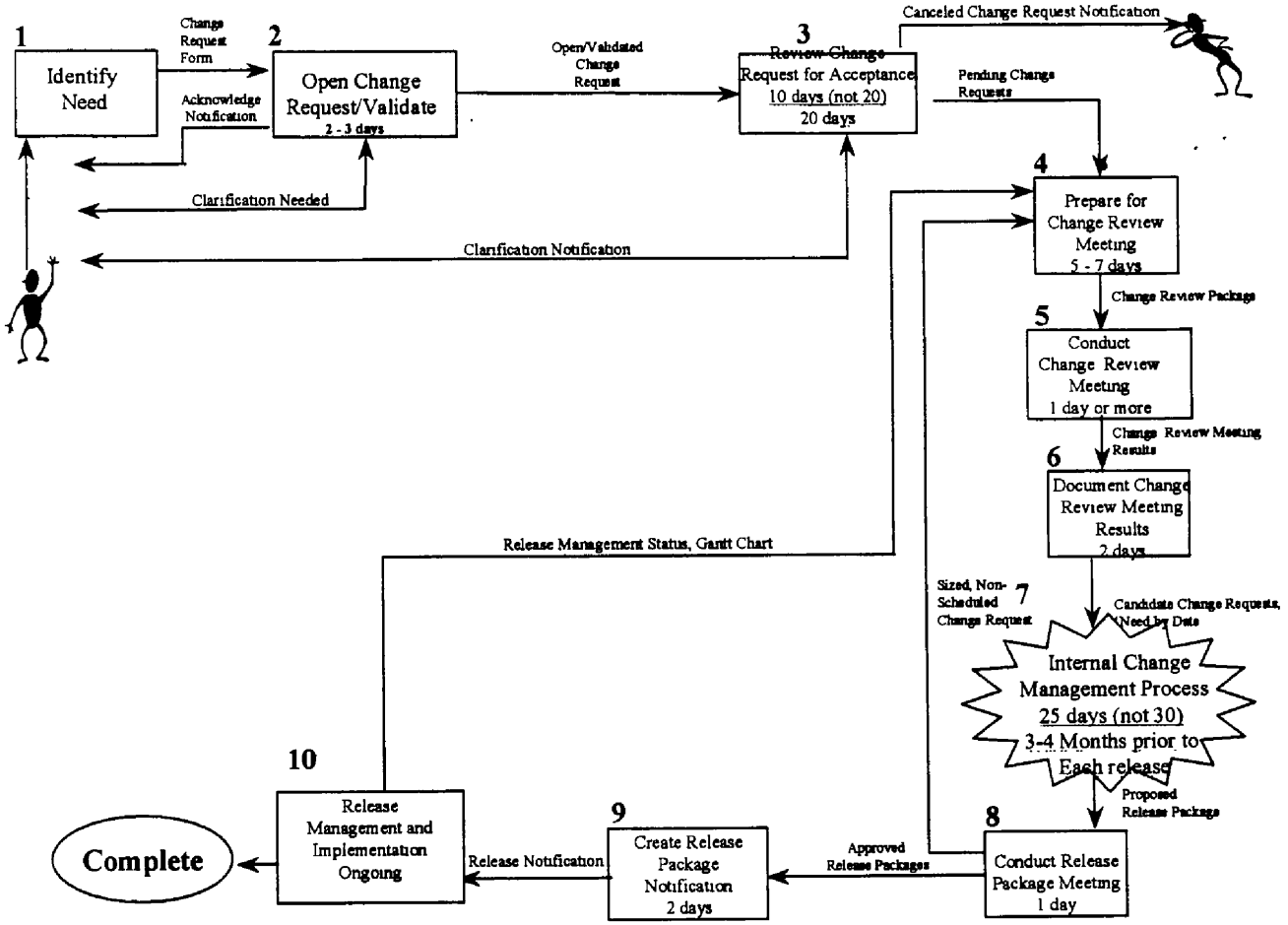

Figure 4-3. Change Control Process Flow

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

Based on the process flow outlined above:

- For the implementation of new features or modification of current functionality, fFinal Software Release ~~Notifications~~ requirements and specifications will be provided ~~30~~ 45 calendar days or more in advance of the implementation date.

- For the implementation of new features or modification of current functionality, ~~D~~draft requirements and specifications for software releases or systems modifications will be provided to CLECs 90 calendar days or more in advance of the implementation data.

- For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 calendar days or more in advance of the implementation date.

- All additions and changes to any BellSouth ~~D~~documentation changes that do not impact CLEC software, ~~for~~ including business rules changes, will be provided to CLECs 30 calendar days or more in advance of implementation date.

- Draft user requirements for software releases will be provided to CLECs NLT 90 calendar days in advance of the release implementation date.

- Final user requirements for software releases will be provided to CLECs NLT 45 calendar days in advance of the release implementation date.

- Notification for the implementation of a new TCIF map will be provided NLT 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map NLT 180 calendar days in advance of the release implementation date.

- Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs NLT 120 calendar days in advance of the release implementation date.

- Final user requirements for the implementation of a new TCIF map will be provided to CLECs NLT 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts, BellSouth will distribute the user requirements at least once a month until one (1) month beyond implementation of the new TCIF map.

- All additions and changes to BellSouth business rule documentation will be provided to CLECs NLT 30 calendar days in advance of the release implementation date.

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

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

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

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

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		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).	Industry Notification via e-mail and web posting	
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue ~~or training issue~~(Agree to remove) forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. **NOTE**: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth feels that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is believed not technically	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	~~10~~ 10 Bus Days 10 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. With input from other participating CLECs, and subsequent to BellSouth's presentation, BellSouth and the originating CLEC will determine the disposition of the request. BellSouth shall consider all possible options for accommodating the request. If BellSouth determines that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. **OBF Issues** All issues that are being actively discussed at OBF or are on the agenda to be discussed will be deferred. If the issue is not active and will not be considered within the next six (6) months, BellSouth will address the issue. ~~4.BST may reject the change request based on the following reasons: cost, industry direction or technically not feasible to implement and will provide notification to the originating party.~~(Agree to Remove) ~~Prior to rejecting a request, all options for accommodating the request will be exhausted. The rejection reason will be shared with the CLECs for input.~~(Agree to Remove) **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with		

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

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		5. Present new change requests submitted since previous Monthly Status Meeting.(Agree to Accept) **Prioritization Meetings ~~(held as needed based on published release schedule)~~(held quarterly in March, June, September and December)**(Agree to accept) 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. BellSouth presents size and scope of each change request and potential release package combinations. BellSouth presents size and scope of each change request. 4. Discuss Impacts. 5. Prioritize Change Requests. 6. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. 7. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 8. Review issues and action items and assign owners.	• Issues and Actions Items (if required)	
6	**BCCM**	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	**BCCM**	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will ~~perform analysis, impact, sizing and~~	**INPUTS:** • Candidate Change Request List with agreed upon ~~'Need by Dates'~~	~~30~~ 25 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
	CCCM	perform analysis, impact, sizing and estimating activities ~~only~~(Agree to remove)-to the Candidate Change Requests ~~that meet the criteria established by the Internal Change Management Process~~.(Agree to Remove) This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for each future release.(Agree to Add: 'for the next release' – Delete: each future release) 3. All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.(Remove – BellSouth cannot support)	'Need by Dates' • Change Request Log **OUTPUTS:** • BellSouth's Proposed Release Package(two scenarios) • CLEC analysis.(Agree to add)	3-4 months prior to each major release. (Interval will vary as a result of design, construction, and testing efforts.)
8	BCCM CCCM	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. ~~Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process.~~ 4. (BELLSOUTH recommends the following two (2) scenarios: a) Non-scheduled Change Requests will need to be re-prioritized at the next Change Review Meeting along with new pending requests to accommodate changes in the Industry's business requirements. (Return to Step 4) or b) Prioritize only the new "Pending CR's" since ~~the last Change Review Meeting~~	**INPUTS:** • BellSouth's Proposed Release Package (two scenarios). • BellSouth's Release Schedule • Change Request Log • CLEC analysis(Agree to add) **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • ~~Non-Scheduled Change Requests (Return to Step 4~~ (BellSouth cannot support)	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		the last Change Review Meeting and incorporate rankings into the overall prioritization list. CLECs, based on group consensus, may request re-ranking of all non-scheduled CR's.) 5. Based on BST/CLEC consensus create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability. Based on BST/CLEC consensus determine which scenario should be implemented. Create the Approved Release Package and schedule. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting for newly established releases.(for the next release) 8. All Change Requests that are in the approved scheduled release (s)(Remove) will be changed to "S" status for "Scheduled".	• Date for initial Release Management Project Meeting for newly established releases.(BellSouth: for next release – Delete: for newly established releases)	
9	BCCM	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package (s)(Remove) **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	**BCCM** **(Project Managers from each participating company)**	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements for software changes(Agree to accept) will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. • For new features or changes to existing functionality, Ddraft Specifications and Requirements will be provided NLT 90 days in advance of Implementation. • Draft User Requirements for software release will be provided to the CLECs NLT 90 calendar days in advance of the release implementation date. • For new features or changes to existing functionality, Ffinal Specifications and Requirements will be provided NLT 3045 days in advance of Implementation. • Final User Requirements for software releases will be provided to the CLECs NLT 45 days in advance of the release implementation date. • For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 days or more in advance of the implementation date • Notification for the implementation of a new TCIF map will be provided NLT 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of	Breakdown Schedule, Risk Assessment, Executive Summary, etc • Draft Specifications and Requirements • Final Specifications and Requirements • Documentation Changes • Implemented Change Request • Draft User Requirements • Final User Requirements • Documentation Changes	

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		the User Requirements for a new TCIF map NLT 180 calendar days in advance of the release implementation date. • Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs NLT 120 calendar days in advance of the release implementation date. • Final User Requirements for the implementation of a new TCIF map will be provided to CLECs NLT 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts, BellSouth will distribute the user requirements at least once a month until one (1) month beyond the implementation of the new TCIF map. • Implementation will occur NLT 6 months from the date of the prioritization of each change request.(BellSouth cannot support) 4. BellSouth Documentation changes, including business rule changes will be provided.(Agree to add) • All such changes will be provided NLT 30 days in advance of Implementation. • All additions and changes to BellSouth business rule documentation will be provided to CLECs NLT 30 calendar days in advance of the release implementation date.		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		• Implementation will occur NLT 90 days from the date of the prioritization of each change request. (BellSouth cannot support) 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.		

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

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

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

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

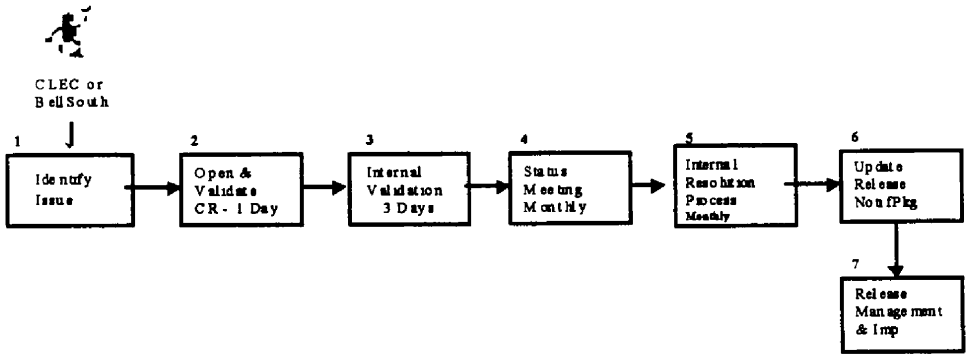

Figure 4-4. Type 2-5 Exception/Expedited Feature Process

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

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

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

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		via email to initiating CLEC. ~~2.~~3. Establish CR status ('N' for New Exception/Expedite). ~~3.~~4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist. ~~4.~~5. Verify specifications and related information exists. ~~5.~~6. Send Clarification Notification via email to the originator if needed. ~~6.~~7. Update CR Status to' PC' for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.	• New Exception/Expedite • Acknowledgment Notification • Clarification Notification (if required)	
3	BCCM	**INTERNAL VALIDATION** 1. Validate that it is an Exception/Expedite. 2. Perform internal exception/expedite analysis. 3. Determine status of request: • If request duplicates existing change request, forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled . • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Exception/Expedite ~~and indicate appropriate Impact Level.~~ • If issue does not qualify for exception/expedited treatment, re-classify as a standard feature change,	**INPUTS:** • New Exception/Expedite **OUTPUTS:** • Validated Exception/Expedite • Exception/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	3 Bus Days

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

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Monthly Status Review Meeting.		
6	BCCM	**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 expedite.	**INPUTS:** • Exception/Expedite Feature Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for expedites (may be less than 30 days).
7	BCCM	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 2-5 Exception/Expedited Feature changes: 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 2. BellSouth business requirements will be presented to CLECs for expedited features (if applicable). If needed, changes will be incorporated and requirements re-baselined. 3. Once an Exception/Expedited Feature Change is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

PART 3 – EXPEDITED FEATURE PROCESS

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

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

Re-classified Defects

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

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

Enhancement to an existing product or service

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

- Must be an enhancement to an existing product or service

- Will follow the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.

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

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

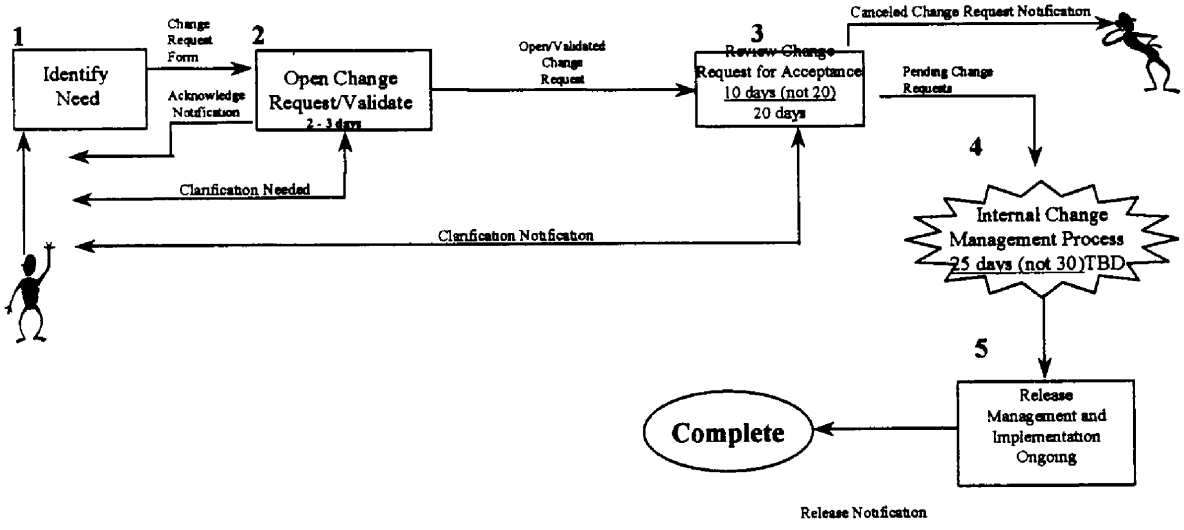

Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

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

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

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**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 Attachment A-1A, Item 22. 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	1 Bus Day Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		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).		
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted area (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. If BellSouth determines that a CLEC initiated expedited change request should not be accepted because of cost, industry direction or because it is considered not technically	**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	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	**BCCM** **CCCM**	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	**INPUTS:** • Change Request Log **OUTPUTS:** • Release Date for Expedited Feature	~~30~~ 25 Still under discussion)
5	**BCCM** **(Project Managers from each participating company)**	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth Business Requirements for software changes will be presented to CLECs, if applicable. If needed, changes will be incorporated and requirements re-baselined. 4. BellSouth Documentation changes, including business rules changes will be provided.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.		

5.0 DEFECT/EMERGENCY CHANGE/~~EXPEDITE NOTIFICATION~~ PROCESS

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

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

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

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

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

- is not working in accordance with the BellSouth baseline business requirements ~~or~~
- is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. (SPLIT into two bullets)
- Is not working in accordance with the business rules that BST has published or otherwise provided to the CLECs
- Is impacting a CLEC's ability to exchange transactions with BellSouth

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- or where a technical implementation is faulty or inaccurate such as to cause incorrect or improperly formatted data. **REMOVE** (BellSouth considers this example a standard feature at which point would follow the Types 2-5 process flow, however if the issue falls under the definition of an

"expedited feature", it would follow that process).

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

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

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

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

- **High Impact**

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

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

- **Medium Impact**

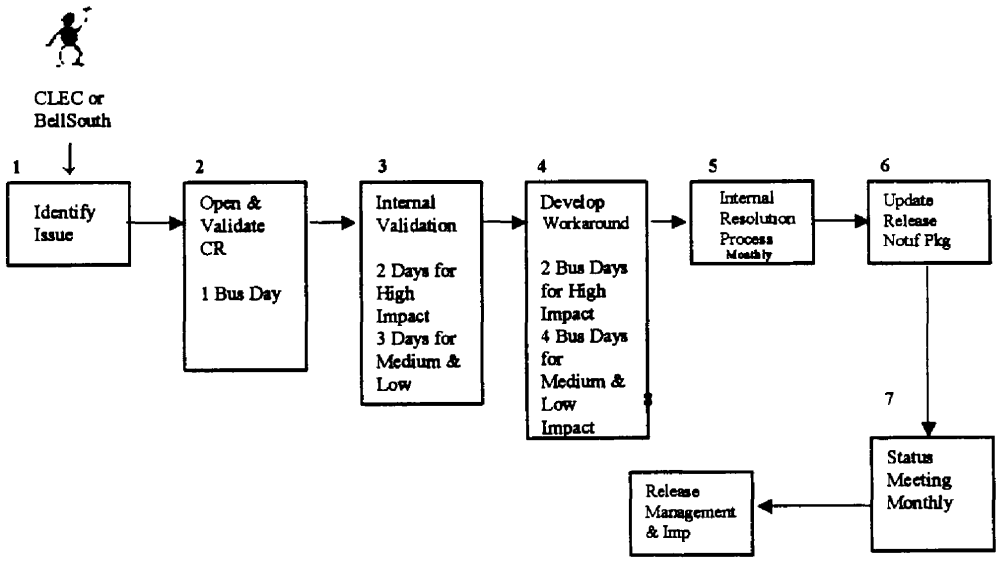
The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

The failure causes inconvenience or annoyance.

Defect Changes identified as High Impact are referred to as **Emergency Changes**. CLECs encountering High Impact defects outside normal business hours (7am – 6pm Eastern) will submit their requests to the Electronic Communications Support (ECS) Group. The ECS Helpdesk number is 888-462-8030. REMOVE – BellSouth can not support.

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



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

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

Figure 5-1. Type 6 Process Flow

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

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Identify Defect/~~Expedite~~.(REMOVED) ~~2.~~ 5. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. ~~3.~~ 6. Include description of business need and details of business impact. ~~4.~~ 7. Attach related requirements and specification documents. These attachments should (must) include the following, if available (REMOVE): • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 6 Change Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE DEFECT/EXPEDITE FORM FOR COMPLETENESS** 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect) 4. BCCM reviews change request for mandatory fields using the Change	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:** • New Defect/Expedite • Acknowledgment Notification • Clarification Notification (if required)	4 hours for High Impact 1 Bus Day for all Impact Types 1 Bus Day for Medium and Low Impact

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Request Form Checklist. 5. Verify specifications and related information exists. 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.		
3	BCCM	**INTERNAL VALIDATION** ~~1.~~4. Validate that it is a defect/expedite. ~~2.~~5. Perform internal defect/expedite analysis. ~~3.~~6. Determine status of request: • If change already exists or CLEC training issue~~or training issue~~ forward Cancellation Notification to CCCM or BCCM and update status to 'C' ~~for Request Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team~~. • If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to 'C'. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect/Expedite and indicate appropriate Impact Level. • If request is not validated as a defect and the requesting CLEC does not agree with the response, the CLEC	**INPUTS:** • New Defect/Expedite **OUTPUTS:** • Validated Defect/Expedite • Defect/Expedite notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	1 Bus Day for High ~~and Medium~~ Impact 2 Bus Days for High Impact 3 Bus Days Medium and Low Impact

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		may follow the escalation process to resolve the issue. • 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. ~~Note: High Impact Expedites will skip Step 4 (Develop Workaround) and be scheduled for the current, next release, or point release, best effort.~~ (REMOVE) • If the process is operating as specified in the baselined requirements and published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s). • If issue is re-classified as a standard feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect/~~expedite~~(REMOVE) process flow and enter Types 2-5 process flow (enter at Step 3). **NOTE**: See Section 9.0 Terms and Definitions – Defect/~~Expedite~~(REMOVE) Status for valid status codes and descriptions. Defect/~~Expedite~~(REMOVE) notification will be provided to CLEC community via e-mail and web posting.		
4	BCCM	**DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)** 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified.	**INPUTS:** • Validated Defect • Clarification Notification (if required)	~~4 Bus Days~~ 1 Bus Day for High and Medium ~~Impact~~

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

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		~~NOTE: Validated defects (High Impact) will be implemented within a 4—25 business day range, best effort.~~ (REMOVED) ~~Expedites (High Impact) will be implemented in the current, next release, or point release, best effort.~~(REMOVED)		within a 4 – 10 business day range, best effort. Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium Impact Defects will be implemented within 90 days. Low Impact defects will be implemented best effort. Low Impact defects will be implemented within a 4 – 20 business day range, best effort. (REMOVE)
~~6~~7	BCCM	**UPDATE RELEASE PACKAGE NOTIFICATION** ~~1.~~3. Update and distribute release notification package via web. ~~2.~~4. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".	**INPUTS:** • Defect/~~Expedite~~(Remove) Feature Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for defects/~~expedite~~s(Removed) (may be less than 30 days).

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Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Note: The release notification will be published in a timely manner, based on the release constraints associated with the defect/expedite.		
7	BCCM	MONTHLY STATUS MEETING 5.6. Provide status of Defect. 6.7. Solicit CLEC/ BST input. 7.8. Update Defect/Expedite information as needed. (BELLSOUTH AGREES TO THIS STEP)	**INPUTS:** • Defects/Expedites Received • Change Request Log • Defect/Expedite Analysis • Workaround (if applicable) **OUTPUTS:** • Updated status • Updated Change Request Log Meeting minutes	Monthly or when status changes, whichever occurs first.
8	BCCM	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 6 changes: 4. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 3.5. Once a defect/~~expedite~~(REMOVED) is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT AND APPROVAL (Agree to Add)

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be scheduled to coincide with the published release schedules. [For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates.] All additions and changes to BellSouth business rule documentation will be provided to CLECs NLT 30 calendar days in advance of the release implementation date. The prioritization meeting dates will be communicated when the release schedule is published.

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

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

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

Part 2 – Change Review Package

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

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

- BellSouth's estimate of the size and scope of each Change Request(Agree to accept)
- Schedule of releases and capacity in each(BellSouth can only support providing the 'schedule of the releases')
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

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

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

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- CLECs may choose to vote "no" on change requests that may potentially negatively impact its business. If a majority of CLECs vote "no" on any certain change request, that request will not be implemented.
- CLECs may choose to "defer" on voting on change requests that may negatively impact its business. A rating of "defer" will not be counted in the overall rating.
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- ~~Manual processes and~~ (Do not delete - BellSouth prefers that Manual CR's follow the same prioritization process as other CR's) Documentation changes(Agree) will be prioritized separately; however they will need to be synchronized with the electronic interface changes

- ~~Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached~~(Agree to remove)
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

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

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

Part 4 – Developing and Approving Release Packages

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

Subsequent to the Change Review Meeting, BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held three (3) to four (4) months prior to each major release.

- Sizing and sequencing of ~~prioritized~~ change requests will ~~begin~~ be accomplished at the Prioritization Meeting. CLECs may take into account the size and scope when prioritizing items ~~with the top priority items and continue down through the list until the capacity constraints for each future release have been reached.~~ (BellSouth accepts)
- BellSouth will develop several variations of release packages to include all of the prioritized requests.
- BellSouth will develop and present two scenarios for the next release. Based on group consensus at the Release Package Meeting, the determination will be made as to which scenario should be implemented. BST/CLEC consensus will be used to create the Approved Release Package and schedule.

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

During the Release Package Meeting BST will present its proposed release packages. BST and CLECs will then vote on the release package or combination of release packages to be implemented. BST/CLEC consensus will be used to create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability. (BellSouth cannot support)

~~7.~~08.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

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

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC community. As new interfaces are deployed, they will be added to the scope of this document, as appropriate, based on the use by the CLEC and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs by submitting a Type 4 change request(Remove) through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used

and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

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

Retirement of Versions

When software versions are retired, BellSouth will notify the CLECs by submitting a Type 4 change request through the Change Control Process. Once a change request to retire a version of an interface is initiated, BellSouth will present its proposed changes to the CLECs at the next monthly status meeting. BellSouth will make best effort to jointly develop the requirements with the CLECs and will, at a minimum, provide requirements and related software, if applicable, at least six months in advance of putting the new version into production.

Retirement of Versions

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

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.(Excludes Expedites)
- For Type 6 High and Medium Impact(See next bullet) issues, the escalation process is agreed to allow BellSouth a ~~three~~one-day turnaround to provide a status for each cycle of escalation.
- For Type 6 High Impact issues, the escalation process is agreed to allow BellSouth a two (2) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a five (5) day turnaround to provide a status for each cycle of escalation.
- For Type 6 Low Impact and Type 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three-day turnaround to provide a status for each cycle of escalation.(See next bullet)
- For Types 4-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.

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

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

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

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	**Don Tighe** **Manager - EC Support Group** **Interconnection Operations**	**404-532-2233**	**1-800-946-4646 PIN 1440050**	Don.Tighe@bridge.bellsouth.com
2nd Level	**Bruce Smith** **Operations Director - EC Support Group** **Interconnection Operations**	**205-988-7211**	**1-800-542-3260**	Bruce.Smith@bridge.bellsouth.com
3rd Level	**Bill Reid** **Operations Assistant Vice President** **Interconnection Operations**	**205-988-1447**	**1-800-946-4646 PIN 1179523**	Bill.C.Reid@bridge.bellsouth.com

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

Escalation Cycle for Types 2-6 Change Requests

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

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

Contact List for Escalation - Type 2 - 6 Changes

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

Type 6, High and Medium Impact Changes: Within 1 business day of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 6 High Impact Changes: Within 2 business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Type 6 Medium and Low Impact Changes: Within five (5) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Type 6 Low Impact and Type 2-5 Expedite Changes: Within 3 business days of receipt (2 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 4-5 Expedite Changes: Within three (3) business days of receipt (2 from acknowledgment), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	**Valerie Cottingham** **Sales Director Change Control Process**	**205-321-2168**	Valerie.cottingham@bridge.bellsouth.com
2nd Level	**Terrie Hudson Director (for Systems Issues)**	**770-936-3740**	Terrie.Hudson@bridge.bellsouth.com
	Joy Lofton Director (for Business Rules/Operations Issues)	**404-927-7828**	Joy.A.Lofton@bridge.bellsouth.com
3rd Level	**Doug McDougal Senior Director (for Systems Issues)**	**404-927-7505**	Doug.Mcdougal@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	**404-927-3545**	Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

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

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

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

- Either party to the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, both parties shall participate in good faith.

- Either party may file a formal complaint with the State PSC, requesting resolution of the issue, without necessity for prior mediation.

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

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

- 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

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

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

(BellSouth continuing to Review)

10.0 TESTING ENVIRONMENT

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

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

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

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

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

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

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

EDI

www.interconnection.bellsouth.com/markets/lec.html
Select "Customer Guides"
Select "Local Exchange Ordering Guides"
Select "BellSouth EDI Specifications – TCIF 9"
Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html
Select "OSS Information Center"
Select "TAG Documentation"

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

11.0 TERMS AND DEFINITIONS

A

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

- Contract Negotiations
- 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.

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

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

B

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

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

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

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

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

C

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

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

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

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

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

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

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

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

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.

  ~~**CT = Training.** Requested change already exists, additional training may be required.~~(agree to remove)
- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).

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

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

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

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

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

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

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

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

D

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

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

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

- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect/Expedite Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect/Expedite.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

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

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

Emergency Change. Defect Changes identified as High Impact are **emergency changes**.(Remove – these changes are already addressed as Type 1 System Outages)

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

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

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

H

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

I

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

L

Low Impact. The failure causes inconvenience or annoyance.

M

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

N

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

P

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

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

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

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

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

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

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

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

R

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

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

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

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

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

S

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

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

V

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

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

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

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

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

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

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

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

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-23

This sheet transmits the

November 16, 2000 Parsed CSR Sub-Team Meeting Minutes

which consists of 4 pages.

BELLSOUTH

November 16, 2000
Parsed CSR Sub Team
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY	DATE PREPARED
Parsed CSR Sub Team	Cheryl Storey – Change Control Team	11-17-00
BellSouth Conference Center		

Participants/Attendees

PARTICIPANT	COMPANY
Sheriann Lively	Trivergent
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Jill Williamson	AT&T
Bill Grant	Telcordia
Becky Wellman	IDS
Edwardine Marrone	BST

PARTICIPANT	COMPANY
Jane Hunter	Sprint
Suzanne Angelo	Telcordia
David Burley	WorldCom
Vickie Beachley	BST

Meeting Information History

DATE	START TIME	END TIME
11/16/00	**10:00 AM EST**	**3:00 PM EST**

MEETING PURPOSE

- **Review 10/19/00 Action Items and reach consensus on the field definitions & field valid values.**
- **Determine the usage (required, optional or conditional) for each field**
- **Discuss next steps: (1) CLEC Community review and concurrence, (2) BST Internal Review of CLEC Requirements**
- **Review New Action Items**

MEETING MINUTES

Agenda Items	Discussion
1. Required, Conditional & Optional Definitions	The following definitions were agreed upon for required, conditional and optional: Required - always going to be transmitted. Conditional for Query - Required or prohibited under certain specified circumstances related to dependencies of other fields. Conditional for Response - Required if information exists on the CSR. Optional - not applicable for Query or Response.

Agenda Items	Discussion
2. Review of CLEC User Requirements (included the responses to the 10/19 Action Items)	Edwardine Marrone led the review of the data elements with the Sub Team. The results of the changes agreed upon are reflected in the attached updated CLEC requirements document. Vickie Beachley will be the BST Internal Project Manager for this effort. It was agreed that the deleted fields would be removed from the next update of the CLEC requirements. TYTYP Field - For the "E" entry, it was agreed that we add billing and directory delivery. D/TSENT - divide into two fields: - DT-SENT (8 numeric) - TM-SENT (6 numeric) Discussion was held regarding what information would be returned if queried by the following fields: ATN - return the entire account. AN - return the entire account. WTN - return just that working telephone number. ECCKT - return just the ECCKT information. The CLECs do not want a reference message to the Miscellaneous Account Number. FEATURE field - during the BST Internal review, it will be determined if something will always be returned in the FEATURE field. Discussion took place on the field length of the suffix fields being different. The street address fields are 4 a/n. The house number fields are 5 a/n. YPHV (Yellow Page Heading Verbiage) field is not supported by BellSouth as a separate field, the YPH Verbiage is included in the YPH field. The CLECs would like this information parsed.

Agenda Items	Discussion
3. Summary of Action Items	BellSouth will address the following action items: • D/TRCVD - determine if this information will/can be returned. If returned, as two elements. • Investigate what validation takes place on the "End User Name" field on the LSR. • Verify the field length for "Feature Description" • Ensure valid entries listed under "ERRCODE" are covered under the Response codes (RESPC & RESPD). Also compare OBF codes to what BST currently has. • Confirm if "O" and "P" are valid entries for FPI.
4. NEXT STEPS	BellSouth will update the Parsed CSR requirements spreadsheet with the agreed upon changes and provide to the Sub Team during the week of 11/20/00. BellSouth will also provide a list of the above action items with target due date for a response. The Sub Team will review the updated requirements and advise Change Control of any questions, comments within 7 - 10 days. The final CLEC Parsed CSR requirements will be shared with the CLEC community for feedback and concurrence. Once CLEC community concurrence obtained, BST Internal review of the requirements will take place. An internal BST meeting is scheduled for the week of 11/27/00. As a result of this meeting, a preliminary schedule and timelines will be developed and shared with the CLEC community. Targeting the first of 2001 to have a follow-up meeting with the CLEC community.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-24

This sheet transmits the

Percent Flow-Through Service Requests Report

which consists of 38 pages.

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (SUMMARY)
REPORT PERIOD: 09/01/00 - 09/30/00

		ADJUSTED FLOW-THROUGH %
CLEC AGGREGATE		
REGION ALL SERVICES		88.42%
		FLOW-THROUGH %
BST AGGREGATE		
REGION		
- RETAIL RESIDENCE		95.10%
- RETAIL BUSINESS **		0 **

Note **. According to the FCC's ordering flow-through definition in the Louisiana II Order, stating that orders must be transmitted electronically through the gateway without manual intervention, BellSouth has uncovered that BST retail business orders have no mechanized service order generation and therefore do not fall within the FCC's flow-through definition. Therefore, the appropriate BST business retail flow-through is really 0.

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#1		0	20	0	0	20	3	0	0	17	1	1	0	16	94.12%	94.12%
#2		0	1379	0	0	1379	45	78	15	1241	56	40	16	1185	95.49%	96 73%
#3		0	0	0	1	1	0	1	0	0	0	0	0	0	0.00%	0 00%
#4		1	288	0	0	288	28	31	5	224	13	8	5	211	94.20%	96.35%
#5		0	46	0	0	46	2	12	6	26	11	8	3	15	57.69%	65.22%
#6		2	0	0	2	2	2	0	0	0	0	0	0	0	0.00%	0.00%
#7		2	1018	0	0	1018	32	28	13	945	87	83	4	858	90.79%	91.18%
#8		14	1182	0	0	1182	52	89	9	1032	128	119	9	904	87.60%	88.37%
#9		2	76	0	0	76	30	3	5	38	19	17	2	19	50.00%	52.78%
#10		13	3895	0	0	3895	327	483	11	3074	132	121	11	2942	95.71%	96 05%
#11		3	635	0	0	635	45	39	0	551	27	27	0	524	95.10%	95.10%
#12		1	28	0	0	28	4	7	0	17	13	12	1	4	23.53%	25.00%
#13		0	93	0	0	93	5	3	0	85	12	10	2	73	85.88%	87 95%
#14		0	26	0	0	26	2	3	0	21	4	4	0	17	80.95%	80 95%
#15		1	14	0	0	14	4	9	0	1	0	0	0	1	100 00%	100.00%
#16		3	0	24	0	24	4	7	3	10	10	9	1	0	0.00%	0 00%
#17		0	3	0	0	3	0	0	0	3	0	0	0	3	100.00%	100.00%
#18		1	133	0	0	133	12	15	0	106	10	9	1	96	90 57%	91 43%
#19		2	473	0	0	473	120	24	7	322	162	151	11	160	49.69%	51.45%
#20		188	0	0	642	642	277	109	7	249	66	51	15	183	73.49%	78.21%
#21		188	1404	0	0	1404	181	222	106	895	474	424	50	421	47.04%	49.82%
#22		2000	0	0	27270	27270	4864	3882	351	18173	4634	3666	968	13539	74.50%	78 69%
#23		2000	1881	0	0	1881	182	256	40	1403	519	440	79	884	63.01%	66.77%
#24		0	112	0	0	112	11	10	2	89	5	3	2	84	94.38%	96 55%
#25		0	195	0	0	195	37	26	3	129	38	38	0	91	70 54%	70 54%
#26		4	419	0	0	419	38	4	7	370	40	40	0	330	89.19%	89 19%
#27		5	932	0	0	932	43	68	11	810	73	59	14	737	90.99%	92.59%
#28		59	0	0	2662	2662	43	97	35	2487	84	69	15	2403	96.62%	97.21%
#29		59	496	0	0	496	36	61	16	383	68	53	15	315	82.25%	85 60%
#30		1	19	0	0	19	0	2	1	16	3	2	1	13	81.25%	86 67%
#31		21	0	115	0	115	80	5	0	30	23	21	2	7	23.33%	25.00%
#32		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#33		2	138	0	0	138	19	8	0	111	50	49	1	61	54 95%	55.45%
#34		1	333	0	0	333	23	14	8	288	100	96	4	188	65.28%	66 20%

ORDERING

REPORT PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING									FLOWTHROUGH	
		LEO					LESOG										
			Mechanized Interface Used				Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#35		20	321	0	0	321	51	33	2	235	39	36	3	196	83.40%	84 48%
#36		59	0	0	2330	2330	119	162	13	2036	67	44	23	1969	96.71%	97 81%
#37		59	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#38		0	115	0	0	115	8	8	0	99	2	2	0	97	97.98%	97.98%
#39		149	6839	0	0	6839	481	1348	77	4933	1574	1330	244	3359	68.09%	71 64%
#40		1	197	0	0	197	21	17	4	155	19	18	1	136	87.74%	88.31%
#41		18	0	77	0	77	60	9	4	4	2	1	1	2	50.00%	66.67%
#42		18	2	0	0	2	2	0	0	0	0	0	0	0	0.00%	0.00%
#43		4	2776	0	0	2776	161	150	15	2450	146	126	20	2304	94.04%	94.81%
#44		0	2	0	0	2	0	0	2	0	0	0	0	0	0.00%	0 00%
#45		0	54	0	0	54	3	5	2	44	30	22	8	14	31 82%	38.89%
#46		2	1238	0	0	1238	176	75	7	980	139	134	5	841	85 82%	86 26%
#47		13	2974	0	0	2974	215	356	16	2387	148	128	20	2239	93.80%	94 59%
#48		0	68	0	0	68	5	8	0	55	24	22	2	31	56.36%	58 49%
#49		1	1369	0	0	1369	92	119	14	1144	87	78	9	1057	92 40%	93.13%
#50		7	480	0	0	480	93	21	4	362	65	58	7	297	82 04%	83 66%
#51		0	4	0	0	4	3	0	0	1	1	1	0	0	0.00%	0.00%
#52		6	31	0	0	31	3	9	7	12	12	11	1	0	0.00%	0.00%
#53		5	0	0	2	2	0	0	1	1	0	0	0	1	100 00%	100.00%
#54		5	126	0	0	126	14	49	12	51	35	32	3	16	31.37%	33.33%
#55		0	170	0	0	170	22	15	0	133	44	36	8	89	66.92%	71.20%
#56		0	63	0	0	63	6	1	1	55	5	3	2	50	90.91%	94.34%
#57		0	9	0	0	9	1	1	2	5	4	3	1	1	20 00%	25.00%
#58		1	185	0	0	185	12	14	2	157	15	14	1	142	90.45%	91.03%
#59		1	514	0	0	514	45	7	0	462	8	8	0	454	98.27%	98.27%
#60		2	261	0	0	261	10	31	2	218	18	17	1	200	91 74%	92 17%
#61		19	883	0	0	883	129	146	3	605	83	81	2	522	86.28%	86 57%
#62		45	0	0	2730	2730	38	93	43	2556	35	27	8	2521	98 63%	98.94%
#63		45	467	0	0	467	32	64	12	359	49	33	16	310	86.35%	90 38%
#64		59	0	0	131	131	23	52	8	48	46	38	8	2	4 17%	5.00%
#65		1	199	0	0	199	22	21	5	151	21	21	0	130	86.09%	86 09%
#66		2	980	0	0	980	8	48	12	912	67	59	8	845	92 65%	93 47%
#67		0	52	0	0	52	3	13	0	36	10	9	1	26	72.22%	74 29%
#68		0	1	0	0	1	0	0	0	1	1	1	0	0	0 00%	0 00%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																FLOWTHROUGH	
Company Info		LSR SUBMISSION					LSR PROCESSING										
		LEO					LESOG										
			Mechanized Interface Used				Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#69		79	2508	0	0	2508	219	395	31	1863	799	705	94	1064	57.11%	60.15%
#70		0	50	0	0	50	2	16	1	31	13	9	4	18	58.06%	66.67%
#71		1	703	0	0	703	111	92	8	492	57	51	6	435	88.41%	89.51%
#72		1	560	0	0	560	66	61	1	432	55	53	2	377	87.27%	87.67%
#73		1	79	0	0	79	12	5	0	62	8	6	2	54	87.10%	90.00%
#74		0	5	0	0	5	1	0	0	4	0	0	0	4	100.00%	100.00%
#75		4	336	0	0	336	27	33	2	274	32	30	2	242	88.32%	88.97%
#76		60	0	1449	0	1449	187	165	5	1092	225	155	70	867	79.40%	84.83%
#77		60	3424	0	0	3424	302	292	32	2798	327	286	41	2471	88.31%	89.63%
#78		0	6	0	0	6	0	1	0	5	1	1	0	4	80.00%	80.00%
#79		1	0	0	5	5	4	1	0	0	0	0	0	0	0.00%	0.00%
#80		1	264	0	0	264	45	29	3	187	64	54	10	123	65.78%	69.49%
#81		1	37	0	0	37	0	1	1	35	5	4	1	30	85.71%	88.24%
#82		4	368	0	0	368	5	39	7	317	51	47	4	266	83.91%	84.98%
#83		168	0	0	7281	7281	144	300	83	6754	660	587	73	6094	90.23%	91.21%
#84		168	2694	0	0	2694	262	252	50	2130	347	327	20	1783	83.71%	84.50%
#85		9	0	201	0	201	142	34	14	11	10	10	0	1	9.09%	9.09%
#86		9	7	0	0	7	0	3	0	4	3	2	1	1	25.00%	33.33%
#87		8	0	102	0	102	43	23	13	23	7	7	0	16	69.57%	69.57%
#88		8	3	0	0	3	1	0	0	2	1	1	0	1	50.00%	50.00%
#89		0	0	3	0	3	2	0	0	1	1	1	0	0	0.00%	0.00%
#90		39	0	0	813	813	73	131	16	593	247	164	83	346	58.35%	67.84%
#91		2	276	0	0	276	33	40	8	195	37	33	4	158	81.03%	82.72%
#92		8	0	0	1	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#93		8	509	0	0	509	59	52	2	396	97	89	8	299	75.51%	77.06%
#94		13	215	0	0	215	39	14	0	162	66	64	2	96	59.26%	60.00%
#95		0	16	0	0	16	3	1	0	12	4	3	1	8	66.67%	72.73%
#96		0	38	0	0	38	26	3	0	9	1	1	0	8	88.89%	88.89%
#97		0	54	0	0	54	4	4	2	44	10	9	1	34	77.27%	79.07%
#98		0	94	0	0	94	11	15	1	67	8	8	0	59	88.06%	88.06%
#99		302	0	2234	0	2234	3	301	35	1895	1072	882	190	823	43.43%	48.27%
#100		237	0	3181	0	3181	13	619	93	2456	1338	1071	267	1118	45.52%	51.07%
#101		0	371	0	0	371	12	28	0	331	34	32	2	297	89.73%	90.27%
#102		0	2	0	0	2	0	0	0	2	2	2	0	0	0.00%	0.00%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#103		0	14	0	0	14	9	0	1	4	0	0	0	4	100.00%	100.00%
#104		0	11	0	0	11	4	0	0	7	3	3	0	4	57.14%	57.14%
#105		1	17	0	0	17	4	3	1	9	7	7	0	2	22.22%	22 22%
#106		0	132	0	0	132	13	1	0	118	9	7	2	109	92.37%	93 97%
#107		5	36	0	0	36	9	14	0	13	6	6	0	7	53.85%	53 85%
#108		11	335	0	0	335	52	15	1	267	19	19	0	248	92.88%	92 88%
#109		3	0	0	1	1	0	1	0	0	0	0	0	0	0.00%	0 00%
#110		1	60	0	0	60	5	13	2	40	12	12	0	28	70 00%	70.00%
#111		0	23	0	0	23	4	2	2	15	10	8	2	5	33.33%	38.46%
#112		0	5	0	0	5	4	0	0	1	1	1	0	0	0.00%	0.00%
#113		9	0	0	9	9	0	4	0	5	3	3	0	2	40 00%	40.00%
#114		0	66	0	0	66	12	1	2	51	14	13	1	37	72.55%	74 00%
#115		2	7	0	0	7	0	0	2	5	4	1	3	1	20.00%	50.00%
#116		0	353	0	0	353	22	14	4	313	8	8	0	305	97 44%	97.44%
#117		8	141	0	0	141	40	7	2	92	6	4	2	86	93 48%	95.56%
#118		0	16	0	0	16	0	4	0	12	5	4	1	7	58 33%	63.64%
#119		0	14	0	0	14	0	1	0	13	1	1	0	12	92.31%	92 31%
#120		9	3145	0	0	3145	164	275	13	2693	150	136	14	2543	94.43%	94.92%
#121		0	0	1	0	1	1	0	0	0	0	0	0	0	0.00%	0 00%
#122		0	85	0	0	85	20	9	1	55	14	12	2	41	74.55%	77 36%
#123		12	752	0	0	752	53	129	9	561	80	66	14	481	85.74%	87 93%
#124		2	20	0	0	20	3	10	1	6	4	4	0	2	33.33%	33.33%
#125		16	0	0	21	21	1	1	0	19	2	2	0	17	89 47%	89 47%
#126		16	6517	0	0	6517	398	395	44	5680	473	450	23	5207	91 67%	92 05%
#127		273	0	0	938	938	440	95	50	353	115	90	25	238	67.42%	72.56%
#128		273	3335	0	0	3335	978	351	200	1806	857	780	77	949	52.55%	54 89%
#129		0	0	0	3	3	2	0	0	1	1	1	0	0	0.00%	0 00%
#130		1	0	0	14	14	0	7	0	7	4	4	0	3	42.86%	42 86%
#131		0	0	0	1	1	1	0	0	0	0	0	0	0	0.00%	0 00%
#132		0	0	0	1	1	1	0	0	0	0	0	0	0	0 00%	0 00%
#133		0	1	0	0	1	0	1	0	0	0	0	0	0	0 00%	0 00%
#134		1	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0 00%
#135		2	49	0	0	49	10	5	8	26	20	15	5	6	23.08%	28.57%
#136		0	61	0	0	61	5	0	5	51	33	22	11	18	35 29%	45.00%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING									FLOWTHROUGH	
		LEO					LESOG										
		Mechanized Interface Used					Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#137		6	420	0	0	420	51	64	5	300	56	50	6	244	81.33%	82 99%
#138		1	47	0	0	47	3	1	0	43	8	5	3	35	81.40%	87.50%
#139		3	54	0	0	54	5	13	5	31	18	13	5	13	41.94%	50 00%
#140		1	20	0	0	20	4	2	0	14	4	4	0	10	71.43%	71.43%
#141		1	106	0	0	106	9	10	1	86	3	2	1	83	96.51%	97.65%
#142		5	394	0	0	394	52	38	0	304	38	34	4	266	87.50%	88.67%
#143		0	5	0	0	5	3	0	0	2	0	0	0	2	100.00%	100.00%
#144		1	101	0	0	101	0	0	0	101	101	93	8	0	0.00%	0 00%
#145		2	543	0	0	543	62	29	2	450	21	15	6	429	95.33%	96 62%
#146		29	0	0	352	352	10	32	5	305	30	21	9	275	90.16%	92 91%
#147		0	15	0	0	15	0	2	0	13	1	1	0	12	92 31%	92.31%
#148		16	2228	0	0	2228	177	188	30	1833	134	99	35	1699	92.69%	94.49%
#149		29	0	0	9025	9025	158	854	0	8013	116	99	17	7897	98.55%	98.76%
#150		29	204	0	0	204	3	45	0	156	17	17	0	139	89.10%	89.10%
#151		11	721	0	0	721	104	103	27	487	163	142	21	324	66.53%	69.53%
#152		1	891	0	0	891	103	50	2	736	102	87	15	634	86.14%	87 93%
#153		0	341	0	0	341	41	29	3	268	20	17	3	248	92.54%	93.58%
#154		78	0	0	1009	1009	504	36	72	397	374	335	39	23	5 79%	6.42%
#155		4	502	0	0	502	21	32	2	447	12	12	0	435	97.32%	97 32%
#156		69	0	0	1384	1384	49	132	3	1200	109	99	10	1091	90.92%	91.68%
#157		69	267	0	0	267	58	38	11	160	35	29	6	125	78.13%	81.17%
#158		21	2287	0	0	2287	198	199	24	1866	335	317	18	1531	82.05%	82.85%
#159		33	380	0	0	380	60	74	26	220	97	83	14	123	55 91%	59.71%
#160		0	71	0	0	71	6	4	3	58	9	9	0	49	84.48%	84.48%
#161		22	0	0	4785	4785	70	353	0	4362	42	33	9	4320	99.04%	99 24%
#162		22	237	0	0	237	4	87	1	145	4	4	0	141	97.24%	97 24%
#163		75	0	0	1	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#164		13	750	0	0	750	48	87	13	602	48	46	2	554	92.03%	92 33%
#165		75	3766	0	0	3766	287	322	74	3083	250	228	22	2833	91 89%	92.55%
#166		8	290	0	0	290	19	4	2	265	19	19	0	246	92 83%	92.83%
#167		4	1432	0	0	1432	104	91	25	1212	55	45	10	1157	95.46%	96 26%
#168		15	611	0	0	611	41	108	5	457	82	79	3	375	82.06%	82.60%
#169		2	733	0	0	733	35	39	2	657	22	19	3	635	96.65%	97 09%
#170		4	1367	0	0	1367	112	65	38	1152	73	61	12	1079	93 66%	94 65%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING									FLOWTHROUGH	
		LEO					LESOG										
			Mechanized Interface Used				Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#171		0	244	0	0	244	11	15	3	215	11	11	0	204	94.88%	94.88%
#172		4	319	0	0	319	15	23	0	281	38	37	1	243	86.48%	86 79%
#173		0	45	0	0	45	5	2	1	37	3	2	1	34	91.89%	94 44%
#174		3	91	0	0	91	55	5	3	28	18	18	0	10	35.71%	35.71%
#175		33	0	0	214	214	2	52	3	157	35	33	2	122	77.71%	78 71%
#176		33	421	0	0	421	76	30	7	308	81	75	6	227	73.70%	75.17%
#177		1	176	0	0	176	20	18	0	138	10	6	4	128	92.75%	95.52%
#178		7	129	0	0	129	18	13	3	95	44	30	14	51	53.68%	62 96%
#179		0	0	0	1	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#180		0	3	0	0	3	0	0	0	3	0	0	0	3	100 00%	100.00%
#181		0	4	0	0	4	0	0	0	4	2	2	0	2	50 00%	50.00%
#182		0	4	0	0	4	0	0	1	3	2	2	0	1	33.33%	33.33%
#183		0	4	0	0	4	1	0	0	3	1	1	0	2	66.67%	66 67%
#184		0	5	0	0	5	0	0	0	5	1	1	0	4	80.00%	80 00%
#185		0	29	0	0	29	11	2	0	16	13	8	5	3	18.75%	27.27%
#186		65	11292	0	0	11292	310	753	70	10159	1147	1058	89	9012	88 71%	89 49%
#187		0	7	0	0	7	1	1	1	4	1	0	1	3	75.00%	100.00%
#188		6	997	0	0	997	114	77	15	791	281	251	30	510	64.48%	67.02%
#189		0	198	0	0	198	15	8	3	172	9	7	2	163	94.77%	95.88%
#190		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#191		0	1	0	0	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#192		0	29	0	0	29	2	2	0	25	6	5	1	19	76.00%	79.17%
#193		4	353	0	0	353	39	30	5	279	30	28	2	249	89 25%	89 89%
#194		1	264	0	0	264	25	27	0	212	30	28	2	182	85.85%	86.67%
#195		4	828	0	0	828	92	40	27	669	253	251	2	416	62.18%	62 37%
#196		49	0	1376	0	1376	654	130	89	503	177	127	50	326	64.81%	71 96%
#197		49	284	0	0	284	23	30	0	231	67	51	16	164	71 00%	76 28%
#198		0	24	0	0	24	2	2	1	19	2	2	0	17	89.47%	89.47%
#199		6	82	0	0	82	8	8	4	62	38	32	6	24	38.71%	42 86%
#200		9	0	0	293	293	37	37	1	218	81	71	10	137	62.84%	65 87%
#201		9	10	0	0	10	0	4	0	6	5	5	0	1	16.67%	16.67%
#202		3	195	0	0	195	16	31	2	146	15	14	1	131	89.73%	90 34%
#203		0	152	0	0	152	12	7	0	133	4	4	0	129	96.99%	96.99%
#204		0	19	0	0	19	3	2	0	14	1	0	1	13	92.86%	100 00%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING									FLOWTHROUGH	
		LEO					LESOG										
			Mechanized Interface Used				Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#205		0	155	0	0	155	13	9	3	130	27	26	1	103	79.23%	79.84%
#206		0	76	0	0	76	26	10	1	39	20	16	4	19	48.72%	54.29%
#207		65	0	0	13611	13611	292	1513	0	11806	223	180	43	11583	98 11%	98 47%
#208		65	562	0	0	562	9	76	1	476	18	17	1	458	96.22%	96.42%
#209		5	1149	0	0	1149	90	113	7	939	66	57	9	873	92.97%	93.87%
#210		3	17	0	0	17	7	0	0	10	1	1	0	9	90 00%	90.00%
#211		0	12	0	0	12	0	1	0	11	2	2	0	9	81.82%	81 82%
#212		423	0	0	1332	1332	25	87	75	1145	81	72	9	1064	92.93%	93 66%
#213		423	36778	0	0	36778	1756	3205	237	31580	1326	1131	195	30254	95.80%	96.40%
#214		3	60	0	0	60	0	15	0	45	5	5	0	40	88.89%	88.89%
#215		0	8	0	0	8	3	1	0	4	1	1	0	3	75.00%	75.00%
#216		2	1105	0	0	1105	52	65	5	983	41	34	7	942	95.83%	96.52%
#217		0	103	0	0	103	12	16	1	74	10	6	4	64	86.49%	91.43%
#218		0	192	0	0	192	13	10	1	168	4	3	1	164	97.62%	98.20%
#219		30	0	92	0	92	49	23	13	7	6	2	4	1	14.29%	33.33%
#220		40	0	13	0	13	9	3	0	1	1	1	0	0	0.00%	0.00%
#221		40	1487	0	0	1487	338	213	27	909	364	299	65	545	59 96%	64.57%
#222		0	182	0	0	182	9	43	2	128	5	5	0	123	96.09%	96 09%
#223		0	24	0	0	24	3	3	2	16	10	10	0	6	37.50%	37.50%
#224		41	16210	0	0	16210	1314	1577	174	13145	869	752	117	12276	93.39%	94 23%
#225		0	3	0	0	3	1	0	0	2	1	1	0	1	50 00%	50 00%
#226		2	0	0	190	190	4	17	1	168	17	13	4	151	89.88%	92 07%
#227		2	157	0	0	157	54	9	2	92	27	25	2	65	70.65%	72.22%
#228		5	558	0	0	558	36	40	6	476	115	104	11	361	75.84%	77.63%
#229		0	17	0	0	17	6	1	0	10	4	3	1	6	60.00%	66 67%
#230		0	264	0	0	264	32	8	0	224	11	10	1	213	95 09%	95.52%
#231		6	0	2	0	2	2	0	0	0	0	0	0	0	0.00%	0 00%
#232		6	141	0	0	141	1	8	0	132	5	4	1	127	96 21%	96 95%
#233		0	30	0	0	30	0	0	0	30	9	9	0	21	70.00%	70.00%
#234		39	192	0	0	192	26	21	8	137	38	37	1	99	72.26%	72 79%
#235		1	668	0	0	668	38	59	2	569	49	40	9	520	91.39%	92 86%
#236		3	197	0	0	197	18	14	0	165	23	23	0	142	86.06%	86 06%
#237		1	0	101	0	101	4	6	1	90	3	3	0	87	96.67%	96.67%
#238		1	278	0	0	278	4	11	2	261	37	37	0	224	85.82%	85 82%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

AGGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
		Mechanized Interface Used					Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#239		9	0	0	442	442	15	55	3	369	51	47	4	318	86.18%	87.12%
#240		9	122	0	0	122	35	9	2	76	19	18	1	57	75.00%	76.00%
#241		12	1730	0	0	1730	148	182	12	1388	110	82	28	1278	92.07%	93.97%
#242		6	0	0	2	2	1	0	0	1	0	0	0	1	100.00%	100.00%
#243		1	0	0	1	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#244		0	17	0	0	17	2	1	1	13	4	4	0	9	69.23%	69.23%
#245		6	307	0	0	307	7	23	0	277	18	14	4	259	93.50%	94.87%
#246		1	104	0	0	104	7	2	1	94	7	6	1	87	92.55%	93.55%
#247		3	339	0	0	339	26	17	1	295	13	13	0	282	95.59%	95.59%
#248		11	0	200	0	200	137	28	20	15	12	11	1	3	20.00%	21.43%
#249		15	0	430	0	430	334	37	39	20	20	9	11	0	0.00%	0.00%
#250		15	15	0	0	15	4	7	0	4	2	2	0	2	50.00%	50.00%
#251		1	200	0	0	200	11	19	0	170	23	18	5	147	86.47%	89.09%
#252		23	1937	0	0	1937	231	268	27	1411	292	227	65	1119	79.31%	83.14%
#253		52	0	185	0	185	122	39	8	16	14	9	5	2	12.50%	18.18%
#254		0	40	0	0	40	3	0	0	37	37	1	36	0	0.00%	0.00%
#255		1	52	0	0	52	6	6	0	40	3	2	1	37	92.50%	94.87%
#256		0	8	0	0	8	2	1	1	4	1	1	0	3	75.00%	75.00%
#257		6	448	0	0	448	77	85	14	272	102	90	12	170	62.50%	65.38%
#258		0	31	0	0	31	5	4	2	20	5	4	1	15	75.00%	78.95%
#259		0	31	0	0	31	3	8	1	19	8	7	1	11	57.89%	61.11%
#260		0	45	0	0	45	7	3	1	34	16	15	1	18	52.94%	54.55%
#261		4	80	0	0	80	10	8	3	59	21	18	3	38	64.41%	67.86%
#262		0	86	0	0	86	5	11	4	66	20	20	0	46	69.70%	69.70%
#263		0	92	0	0	92	0	30	12	50	40	10	30	10	20.00%	50.00%
#264		0	102	0	0	102	19	19	3	61	29	26	3	32	52.46%	55.17%
#265		0	124	0	0	124	13	23	6	82	52	45	7	30	36.59%	40.00%
#266		2	254	0	0	254	48	30	1	175	77	69	8	98	56.00%	58.68%
#267		0	5	0	0	5	0	0	0	5	5	1	4	0	0.00%	0.00%
#268		20	426	0	0	426	59	69	10	288	123	105	18	165	57.29%	61.11%
#269		9	678	0	0	678	186	76	25	391	182	155	27	209	53.45%	57.42%
#270		24	0	0	3	3	2	0	0	1	1	1	0	0	0.00%	0.00%
#271		25	0	0	15	15	8	1	0	6	2	2	0	4	66.67%	66.67%
#272		0	20	0	0	20	2	12	0	6	4	4	0	2	33.33%	33.33%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#273		8	131	0	0	131	21	20	3	87	52	42	10	35	40.23%	45 45%
#274		5	347	0	0	347	43	53	8	243	91	80	11	152	62.55%	65 52%
#275		24	696	0	0	696	125	91	10	470	178	147	31	292	62.13%	66.51%
#276		25	1056	0	0	1056	204	122	19	711	302	256	46	409	57.52%	61 50%
#277		1	131	0	0	131	3	10	0	118	42	42	0	76	64.41%	64 41%
#278		2	66	0	0	66	4	9	0	53	8	8	0	45	84.91%	84 91%
#279		0	2	0	0	2	0	0	0	2	2	1	1	0	0 00%	0.00%
#280		22	0	0	129	129	6	15	15	93	7	6	1	86	92.47%	93 48%
#281		22	172	0	0	172	1	38	7	126	19	15	4	107	84.92%	87.70%
LENS Subtotal		4739	168948	0	0	168948	13611	16319	2015	137003	17285	15159	2126	119718	87.38%	88.76%
EDI Subtotal		862	0	9786	0	9786	1846	1429	337	6174	2921	2319	602	3253	52 69%	58.38%
TAG Subtotal		3856	0	0	77647	77647	7216	8120	785	61526	7134	5759	1375	54392	88 40%	90.43%
TOTAL INTERFACES		**9457**	**168948**	**9786**	**77647**	**256381**	**22673**	**25868**	**3137**	**204703**	**27340**	**23237**	**4103**	**177363**	**86.64%**	**88.42%**

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#1		0	1379	0	0	1379	45	78	15	1241	56	40	16	1185	95.49%	96.73%
#2		0	0	0	1	1	0	1	0	0	0	0	0	0	0.00%	0 00%
#3		1	286	0	0	286	28	31	5	222	12	7	5	210	94.59%	96 77%
#4		0	46	0	0	46	2	12	6	26	11	8	3	15	57.69%	65 22%
#5		2	1007	0	0	1007	31	28	13	935	84	81	3	851	91.02%	91 31%
#6		2	0	0	2	2	2	0	0	0	0	0	0	0	0.00%	0 00%
#7		14	1180	0	0	1180	51	89	9	1031	128	119	9	903	87.58%	88.36%
#8		2	12	0	0	12	10	0	1	1	1	1	0	0	0 00%	0 00%
#9		13	3895	0	0	3895	327	483	11	3074	132	121	11	2942	95.71%	96.05%
#10		3	635	0	0	635	45	39	0	551	27	27	0	524	95 10%	95.10%
#11		1	19	0	0	19	2	5	0	12	11	10	1	1	8.33%	9 09%
#12		0	93	0	0	93	5	3	0	85	12	10	2	73	85.88%	87 95%
#13		0	17	0	0	17	0	2	0	15	1	1	0	14	93.33%	93 33%
#14		1	12	0	0	12	3	9	0	0	0	0	0	0	0 00%	0.00%
#15		0	2	0	0	2	0	0	0	2	0	0	0	2	100 00%	100.00%
#16		1	133	0	0	133	12	15	0	106	10	9	1	96	90.57%	91.43%
#17		2	230	0	0	230	36	12	3	179	93	87	6	86	48.04%	49 71%
#18		188	423	0	0	423	36	112	7	268	118	89	29	150	55.97%	62.76%
#19		188	0	0	178	178	29	33	2	114	18	12	6	96	84.21%	88.89%
#20		2000	40	0	0	40	3	18	1	18	17	14	3	1	5.56%	6 67%
#21		2000	0	0	218	218	96	94	1	27	12	6	6	15	55.56%	71 43%
#22		0	112	0	0	112	11	10	2	89	5	3	2	84	94.38%	96.55%
#23		0	153	0	0	153	23	20	1	109	24	24	0	85	77.98%	77 98%
#24		4	419	0	0	419	38	4	7	370	40	40	0	330	89.19%	89 19%
#25		5	912	0	0	912	39	59	10	804	72	58	14	732	91.04%	92.66%
#26		59	496	0	0	496	36	61	16	383	68	53	15	315	82 25%	85.60%
#27		59	0	0	2662	2662	43	97	35	2487	84	69	15	2403	96.62%	97 21%
#28		1	19	0	0	19	0	2	1	16	3	2	1	13	81.25%	86 67%
#29		2	76	0	0	76	9	2	0	65	22	21	1	43	66.15%	67 19%
#30		1	333	0	0	333	23	14	8	288	100	96	4	188	65.28%	66.20%
#31		20	300	0	0	300	46	29	2	223	33	31	2	190	85 20%	85 97%
#32		59	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#33		59	0	0	2330	2330	119	162	13	2036	67	44	23	1969	96 71%	97 81%
#34		0	114	0	0	114	8	8	0	98	2	2	0	96	97.96%	97 96%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING									FLOWTHROUGH	
		LEO					LESOG										
			Mechanized Interface Used				Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#35		149	6186	0	0	6186	368	1186	70	4562	1385	1178	207	3177	69.64%	72 95%
#36		1	195	0	0	195	20	17	4	154	19	18	1	135	87 66%	88.24%
#37		18	0	2	0	2	0	2	0	0	0	0	0	0	0.00%	0 00%
#38		4	2755	0	0	2755	158	148	15	2434	145	125	20	2289	94.04%	94.82%
#39		0	12	0	0	12	1	0	0	11	10	6	4	1	9.09%	14.29%
#40		2	1238	0	0	1238	176	75	7	980	139	134	5	841	85.82%	86 26%
#41		13	2949	0	0	2949	208	355	16	2370	144	124	20	2226	93.92%	94.72%
#42		0	18	0	0	18	1	4	0	13	5	5	0	8	61.54%	61.54%
#43		1	1369	0	0	1369	92	119	14	1144	87	78	9	1057	92.40%	93 13%
#44		7	414	0	0	414	66	18	2	328	56	49	7	272	82.93%	84 74%
#45		6	6	0	0	6	1	2	0	3	3	3	0	0	0.00%	0.00%
#46		5	43	0	0	43	4	13	9	17	10	10	0	7	41 18%	41.18%
#47		5	0	0	2	2	0	0	1	1	0	0	0	1	100.00%	100 00%
#48		0	163	0	0	163	18	15	0	130	42	34	8	88	67.69%	72 13%
#49		0	63	0	0	63	6	1	1	55	5	3	2	50	90 91%	94.34%
#50		0	9	0	0	9	1	1	2	5	4	3	1	1	20.00%	25.00%
#51		1	185	0	0	185	12	14	2	157	15	14	1	142	90.45%	91.03%
#52		1	514	0	0	514	45	7	0	462	8	8	0	454	98 27%	98 27%
#53		2	261	0	0	261	10	31	2	218	18	17	1	200	91.74%	92.17%
#54		19	876	0	0	876	125	146	3	602	80	79	1	522	86 71%	86.86%
#55		45	467	0	0	467	32	64	12	359	49	33	16	310	86.35%	90 38%
#56		45	0	0	2730	2730	38	93	43	2556	35	27	8	2521	98.63%	98 94%
#57		1	199	0	0	199	22	21	5	151	21	21	0	130	86.09%	86 09%
#58		2	965	0	0	965	8	47	9	901	56	48	8	845	93.78%	94.62%
#59		0	51	0	0	51	3	13	0	35	9	8	1	26	74.29%	76 47%
#60		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#61		79	2429	0	0	2429	207	370	30	1822	777	690	87	1045	57.35%	60.23%
#62		0	49	0	0	49	2	16	1	30	12	8	4	18	60.00%	69 23%
#63		1	696	0	0	696	105	92	8	491	56	50	6	435	88 59%	89 69%
#64		1	560	0	0	560	66	61	1	432	55	53	2	377	87.27%	87 67%
#65		1	79	0	0	79	12	5	0	62	8	6	2	54	87.10%	90 00%
#66		4	333	0	0	333	27	32	2	272	31	29	2	241	88.60%	89.26%
#67		60	3424	0	0	3424	302	292	32	2798	327	286	41	2471	88.31%	89.63%
#68		60	0	1449	0	1449	187	165	5	1092	225	155	70	867	79.40%	84.83%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																FLOWTHROUGH	
Company Info		LSR SUBMISSION					LSR PROCESSING										
		LEO					LESOG										
		Mechanized Interface Used					Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#69		0	6	0	0	6	0	1	0	5	1	1	0	4	80.00%	80 00%
#70		1	68	0	0	68	7	10	2	49	17	15	2	32	65.31%	68 09%
#71		1	37	0	0	37	0	1	1	35	5	4	1	30	85.71%	88 24%
#72		4	368	0	0	368	5	39	7	317	51	47	4	266	83.91%	84.98%
#73		168	2694	0	0	2694	262	252	50	2130	347	327	20	1783	83.71%	84.50%
#74		168	0	0	7281	7281	144	300	83	6754	660	587	73	6094	90.23%	91 21%
#75		39	0	0	813	813	73	131	16	593	247	164	83	346	58.35%	67 84%
#76		2	135	0	0	135	16	10	3	106	9	7	2	97	91.51%	93.27%
#77		8	248	0	0	248	12	25	1	210	42	39	3	168	80.00%	81.16%
#78		8	0	0	1	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#79		13	41	0	0	41	3	0	0	38	11	10	1	27	71 05%	72 97%
#80		0	4	0	0	4	0	1	0	3	0	0	0	3	100.00%	100.00%
#81		0	10	0	0	10	5	1	0	4	0	0	0	4	100.00%	100 00%
#82		0	41	0	0	41	2	4	2	33	8	7	1	25	75.76%	78.13%
#83		0	94	0	0	94	11	15	1	67	8	8	0	59	88.06%	88.06%
#84		302	0	2234	0	2234	3	301	35	1895	1072	882	190	823	43 43%	48.27%
#85		237	0	3181	0	3181	13	619	93	2456	1338	1071	267	1118	45.52%	51 07%
#86		0	371	0	0	371	12	28	0	331	34	32	2	297	89.73%	90 27%
#87		0	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#88		1	17	0	0	17	4	3	1	9	7	7	0	2	22.22%	22 22%
#89		0	132	0	0	132	13	1	0	118	9	7	2	109	92.37%	93 97%
#90		11	335	0	0	335	52	15	1	267	19	19	0	248	92.88%	92.88%
#91		1	29	0	0	29	2	5	1	21	6	6	0	15	71.43%	71.43%
#92		9	0	0	9	9	0	4	0	5	3	3	0	2	40.00%	40.00%
#93		0	6	0	0	6	0	0	0	6	3	3	0	3	50.00%	50 00%
#94		0	352	0	0	352	22	14	4	312	8	8	0	304	97.44%	97.44%
#95		8	139	0	0	139	40	7	2	90	6	4	2	84	93.33%	95.45%
#96		0	16	0	0	16	0	4	0	12	5	4	1	7	58.33%	63 64%
#97		0	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0 00%
#98		9	3142	0	0	3142	163	274	13	2692	150	136	14	2542	94.43%	94.92%
#99		12	746	0	0	746	53	128	8	557	76	65	11	481	86.36%	88.10%
#100		2	13	0	0	13	1	7	0	5	4	4	0	1	20 00%	20 00%
#101		16	6517	0	0	6517	398	395	44	5680	473	450	23	5207	91.67%	92 05%
#102		16	0	0	21	21	1	1	0	19	2	2	0	17	89 47%	89 47%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#103		273	103	0	0	103	14	7	6	76	27	26	1	49	64.47%	65 33%
#104		273	0	0	90	90	10	17	3	60	6	3	3	54	90.00%	94 74%
#105		0	61	0	0	61	5	0	5	51	33	22	11	18	35.29%	45.00%
#106		6	419	0	0	419	50	64	5	300	56	50	6	244	81.33%	82.99%
#107		1	47	0	0	47	3	1	0	43	8	5	3	35	81.40%	87.50%
#108		3	32	0	0	32	4	8	2	18	6	5	1	12	66.67%	70.59%
#109		1	7	0	0	7	3	2	0	2	1	1	0	1	50.00%	50.00%
#110		1	105	0	0	105	8	10	1	86	3	2	1	83	96.51%	97 65%
#111		5	390	0	0	390	52	37	0	301	38	34	4	263	87.38%	88.55%
#112		0	3	0	0	3	1	0	0	2	0	0	0	2	100.00%	100.00%
#113		1	98	0	0	98	0	0	0	98	98	90	8	0	0.00%	0.00%
#114		2	543	0	0	543	62	29	2	450	21	15	6	429	95.33%	96.62%
#115		29	0	0	352	352	10	32	5	305	30	21	9	275	90.16%	92 91%
#116		0	15	0	0	15	0	2	0	13	1	1	0	12	92.31%	92 31%
#117		16	2214	0	0	2214	177	188	26	1823	131	98	33	1692	92.81%	94 53%
#118		29	204	0	0	204	3	45	0	156	17	17	0	139	89.10%	89.10%
#119		29	0	0	9025	9025	158	854	0	8013	116	99	17	7897	98.55%	98.76%
#120		0	341	0	0	341	41	29	3	268	20	17	3	248	92.54%	93 58%
#121		4	489	0	0	489	19	28	1	441	10	10	0	431	97.73%	97.73%
#122		69	267	0	0	267	58	38	11	160	35	29	6	125	78.13%	81.17%
#123		69	0	0	1382	1382	49	132	3	1198	109	99	10	1089	90.90%	91 67%
#124		21	2287	0	0	2287	198	199	24	1866	335	317	18	1531	82 05%	82.85%
#125		33	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#126		0	71	0	0	71	6	4	3	58	9	9	0	49	84.48%	84.48%
#127		22	237	0	0	237	4	87	1	145	4	4	0	141	97 24%	97 24%
#128		22	0	0	4785	4785	70	353	0	4362	42	33	9	4320	99 04%	99.24%
#129		13	750	0	0	750	48	87	13	602	48	46	2	554	92.03%	92 33%
#130		75	3766	0	0	3766	287	322	74	3083	250	228	22	2833	91.89%	92.55%
#131		75	0	0	1	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#132		8	290	0	0	290	19	4	2	265	19	19	0	246	92.83%	92 83%
#133		4	1432	0	0	1432	104	91	25	1212	55	45	10	1157	95.46%	96 26%
#134		15	608	0	0	608	40	108	5	455	82	79	3	373	81 98%	82 52%
#135		2	725	0	0	725	34	39	1	651	20	18	2	631	96.93%	97.23%
#136		4	1365	0	0	1365	111	65	38	1151	72	60	12	1079	93 74%	94.73%

REPORT. PERCENT FLOW THROUGH SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD. 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#137		0	244	0	0	244	11	15	3	215	11	11	0	204	94.88%	94.88%
#138		4	319	0	0	319	15	23	0	281	38	37	1	243	86.48%	86.79%
#139		0	45	0	0	45	5	2	1	37	3	2	1	34	91.89%	94.44%
#140		33	421	0	0	421	76	30	7	308	81	75	6	227	73.70%	75.17%
#141		33	0	0	214	214	2	52	3	157	35	33	2	122	77.71%	78.71%
#142		1	176	0	0	176	20	18	0	138	10	6	4	128	92.75%	95.52%
#143		7	14	0	0	14	2	1	0	11	2	1	1	9	81.82%	90.00%
#144		65	11292	0	0	11292	310	753	70	10159	1147	1058	89	9012	88.71%	89.49%
#145		0	5	0	0	5	1	1	1	2	1	0	1	1	50.00%	100.00%
#146		6	997	0	0	997	114	77	15	791	281	251	30	510	64.48%	67.02%
#147		0	195	0	0	195	15	8	3	169	9	7	2	160	94.67%	95.81%
#148		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#149		0	1	0	0	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#150		0	25	0	0	25	2	1	0	22	3	3	0	19	86.36%	86.36%
#151		4	353	0	0	353	39	30	5	279	30	28	2	249	89.25%	89.89%
#152		1	264	0	0	264	25	27	0	212	30	28	2	182	85.85%	86.67%
#153		4	828	0	0	828	92	40	27	669	253	251	2	416	62.18%	62.37%
#154		49	43	0	0	43	5	7	0	31	6	6	0	25	80.65%	80.65%
#155		49	0	175	0	175	10	41	14	110	19	10	9	91	82.73%	90.10%
#156		0	24	0	0	24	2	2	1	19	2	2	0	17	89.47%	89.47%
#157		6	82	0	0	82	8	8	4	62	38	32	6	24	38.71%	42.86%
#158		9	0	0	9	9	0	0	0	9	2	2	0	7	77.78%	77.78%
#159		3	181	0	0	181	14	26	2	139	11	10	1	128	92.09%	92.75%
#160		0	149	0	0	149	12	7	0	130	3	3	0	127	97.69%	97.69%
#161		0	19	0	0	19	3	2	0	14	1	0	1	13	92.86%	100.00%
#162		0	84	0	0	84	7	5	0	72	14	14	0	58	80.56%	80.56%
#163		65	562	0	0	562	9	76	1	476	18	17	1	458	96.22%	96.42%
#164		65	0	0	13611	13611	292	1513	0	11806	223	180	43	11583	98.11%	98.47%
#165		5	1148	0	0	1148	90	113	7	938	66	57	9	872	92.96%	93.86%
#166		3	4	0	0	4	3	0	0	1	1	1	0	0	0.00%	0.00%
#167		423	36776	0	0	36776	1756	3205	237	31578	1326	1131	195	30252	95.80%	96.40%
#168		423	0	0	1332	1332	25	87	75	1145	81	72	9	1064	92.93%	93.66%
#169		3	60	0	0	60	0	15	0	45	5	5	0	40	88.89%	88.89%
#170		0	8	0	0	8	3	1	0	4	1	1	0	3	75.00%	75.00%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#171		2	1105	0	0	1105	52	65	5	983	41	34	7	942	95.83%	96 52%
#172		0	100	0	0	100	12	15	1	72	10	6	4	62	86.11%	91 18%
#173		0	192	0	0	192	13	10	1	168	4	3	1	164	97.62%	98.20%
#174		40	261	0	0	261	25	41	2	193	66	48	18	127	65.80%	72 57%
#175		0	181	0	0	181	9	43	2	127	4	4	0	123	96 85%	96 85%
#176		0	24	0	0	24	3	3	2	16	10	10	0	6	37.50%	37.50%
#177		41	16210	0	0	16210	1314	1577	174	13145	869	752	117	12276	93.39%	94 23%
#178		2	157	0	0	157	54	9	2	92	27	25	2	65	70 65%	72.22%
#179		2	0	0	190	190	4	17	1	168	17	13	4	151	89.88%	92 07%
#180		5	556	0	0	556	34	40	6	476	115	104	11	361	75.84%	77 63%
#181		0	10	0	0	10	2	0	0	8	4	3	1	4	50 00%	57 14%
#182		0	247	0	0	247	26	8	0	213	10	9	1	203	95.31%	95.75%
#183		6	140	0	0	140	1	8	0	131	5	4	1	126	96.18%	96.92%
#184		39	116	0	0	116	12	13	2	89	20	19	1	69	77.53%	78.41%
#185		1	667	0	0	667	38	59	2	568	49	40	9	519	91.37%	92.84%
#186		3	190	0	0	190	13	14	0	163	21	21	0	142	87.12%	87 12%
#187		1	278	0	0	278	4	11	2	261	37	37	0	224	85.82%	85.82%
#188		1	0	101	0	101	4	6	1	90	3	3	0	87	96.67%	96 67%
#189		9	122	0	0	122	35	9	2	76	19	18	1	57	75.00%	76 00%
#190		9	0	0	442	442	15	55	3	369	51	47	4	318	86.18%	87 12%
#191		12	1724	0	0	1724	146	182	12	1384	109	81	28	1275	92 12%	94 03%
#192		6	307	0	0	307	7	23	0	277	18	14	4	259	93.50%	94.87%
#193		1	104	0	0	104	7	2	1	94	7	6	1	87	92.55%	93.55%
#194		3	339	0	0	339	26	17	1	295	13	13	0	282	95.59%	95.59%
#195		1	200	0	0	200	11	19	0	170	23	18	5	147	86.47%	89 09%
#196		23	1862	0	0	1862	212	254	22	1374	271	213	58	1103	80.28%	83 81%
#197		1	52	0	0	52	6	6	0	40	3	2	1	37	92.50%	94.87%
#198		6	292	0	0	292	46	57	7	182	59	48	11	123	67 58%	71.93%
#199		0	2	0	0	2	1	0	0	1	1	1	0	0	0.00%	0 00%
#200		2	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#201		20	76	0	0	76	1	17	2	56	10	7	3	46	82.14%	86.79%
#202		9	177	0	0	177	17	25	2	133	39	29	10	94	70.68%	76 42%
#203		24	12	0	0	12	1	0	4	7	7	5	2	0	0.00%	0 00%
#204		25	7	0	0	7	1	0	0	6	6	1	5	0	0.00%	0 00%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (RESIDENCE DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#205		5	218	0	0	218	15	36	3	164	38	34	4	126	76.83%	78 75%
#206		1	127	0	0	127	3	10	0	114	40	40	0	74	64.91%	64 91%
#207		2	65	0	0	65	4	9	0	52	7	7	0	45	86.54%	86 54%
#208		22	172	0	0	172	1	38	7	126	19	15	4	107	84.92%	87 70%
#209		22	0	0	129	129	6	15	15	93	7	6	1	86	92.47%	93.48%
LENS Subtotal		4643	151901	0	0	151901	10193	14158	1402	126148	12731	11242	1489	113417	89 91%	90.98%
EDI Subtotal		667	0	7142	0	7142	217	1134	148	5643	2657	2121	536	2986	52.92%	58.47%
TAG Subtotal		3658	0	0	47810	47810	1186	4043	302	42279	1847	1522	325	40432	95.63%	96 37%
TOTAL INTERFACES		**8968**	**151901**	**7142**	**47810**	**206853**	**11596**	**19335**	**1852**	**174070**	**17235**	**14885**	**2360**	**156835**	**90.10%**	**91.33%**

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING									FLOWTHROUGH	
		LEO					LESOG										
		Mechanized Interface Used					Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#1		0	20	0	0	20	3	0	0	17	1	1	0	16	94.12%	94.12%
#2		1	2	0	0	2	0	0	0	2	1	1	0	1	50.00%	50.00%
#3		2	11	0	0	11	1	0	0	10	3	2	1	7	70.00%	77 78%
#4		14	2	0	0	2	1	0	0	1	0	0	0	1	100.00%	100 00%
#5		2	64	0	0	64	20	3	4	37	18	16	2	19	51.35%	54.29%
#6		1	9	0	0	9	2	2	0	5	2	2	0	3	60.00%	60.00%
#7		0	9	0	0	9	2	1	0	6	3	3	0	3	50.00%	50.00%
#8		1	2	0	0	2	1	0	0	1	0	0	0	1	100.00%	100.00%
#9		0	1	0	0	1	0	0	0	1	0	0	0	1	100 00%	100 00%
#10		2	243	0	0	243	84	12	4	143	69	64	5	74	51 75%	53.62%
#11		188	957	0	0	957	138	103	99	617	346	329	17	271	43.92%	45 17%
#12		188	0	0	416	416	243	39	5	129	42	37	5	87	67 44%	70.16%
#13		2000	37	0	0	37	6	16	1	14	12	11	1	2	14 29%	15.38%
#14		2000	0	0	73	73	20	36	1	16	9	4	5	7	43.75%	63 64%
#15		0	42	0	0	42	14	6	2	20	14	14	0	6	30.00%	30 00%
#16		5	20	0	0	20	4	9	1	6	1	1	0	5	83.33%	83.33%
#17		21	0	11	0	11	1	3	0	7	4	4	0	3	42.86%	42.86%
#18		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#19		2	62	0	0	62	10	6	0	46	28	28	0	18	39 13%	39 13%
#20		20	21	0	0	21	5	4	0	12	6	5	1	6	50.00%	54.55%
#21		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#22		149	653	0	0	653	113	162	7	371	189	152	37	182	49.06%	54 49%
#23		1	2	0	0	2	1	0	0	1	0	0	0	1	100.00%	100.00%
#24		18	2	0	0	2	2	0	0	0	0	0	0	0	0.00%	0.00%
#25		18	0	3	0	3	0	0	0	3	1	0	1	2	66.67%	100 00%
#26		4	21	0	0	21	3	2	0	16	1	1	0	15	93 75%	93 75%
#27		0	42	0	0	42	2	5	2	33	20	16	4	13	39.39%	44 83%
#28		13	25	0	0	25	7	1	0	17	4	4	0	13	76.47%	76.47%
#29		0	50	0	0	50	4	4	0	42	19	17	2	23	54.76%	57 50%
#30		7	66	0	0	66	27	3	2	34	9	9	0	25	73.53%	73 53%
#31		0	4	0	0	4	3	0	0	1	1	1	0	0	0.00%	0 00%
#32		6	21	0	0	21	2	7	5	7	7	6	1	0	0.00%	0 00%
#33		5	81	0	0	81	10	36	2	33	24	21	3	9	27.27%	30.00%
#34		0	7	0	0	7	4	0	0	3	2	2	0	1	33 33%	33 33%

ORDERING

REPORT. PERCENT FLOW THROUGH SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#35		19	7	0	0	7	4	0	0	3	3	2	1	0	0.00%	0.00%
#36		2	15	0	0	15	0	1	3	11	11	11	0	0	0.00%	0 00%
#37		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0 00%
#38		79	79	0	0	79	12	25	1	41	22	15	7	19	46.34%	55.88%
#39		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0 00%
#40		1	7	0	0	7	6	0	0	1	1	1	0	0	0.00%	0.00%
#41		0	5	0	0	5	1	0	0	4	0	0	0	4	100.00%	100 00%
#42		4	3	0	0	3	0	1	0	2	1	1	0	1	50.00%	50.00%
#43		1	195	0	0	195	38	19	1	137	46	38	8	91	66.42%	70.54%
#44		1	0	0	4	4	4	0	0	0	0	0	0	0	0.00%	0.00%
#45		9	7	0	0	7	0	3	0	4	3	2	1	1	25.00%	33 33%
#46		8	3	0	0	3	1	0	0	2	1	1	0	1	50.00%	50.00%
#47		2	141	0	0	141	17	30	5	89	28	26	2	61	68 54%	70.11%
#48		8	261	0	0	261	47	27	1	186	55	50	5	131	70.43%	72 38%
#49		13	174	0	0	174	36	14	0	124	55	54	1	69	55.65%	56 10%
#50		0	12	0	0	12	3	0	0	9	4	3	1	5	55 56%	62.50%
#51		0	28	0	0	28	21	2	0	5	1	1	0	4	80 00%	80 00%
#52		0	13	0	0	13	2	0	0	11	2	2	0	9	81 82%	81.82%
#53		0	12	0	0	12	9	0	0	3	0	0	0	3	100.00%	100.00%
#54		0	9	0	0	9	4	0	0	5	3	3	0	2	40.00%	40.00%
#55		5	36	0	0	36	9	14	0	13	6	6	0	7	53.85%	53 85%
#56		1	31	0	0	31	3	8	1	19	6	6	0	13	68 42%	68 42%
#57		0	23	0	0	23	4	2	2	15	10	8	2	5	33.33%	38.46%
#58		0	5	0	0	5	4	0	0	1	1	1	0	0	0.00%	0 00%
#59		0	60	0	0	60	12	1	2	45	11	10	1	34	75.56%	77 27%
#60		2	7	0	0	7	0	0	2	5	4	1	3	1	20 00%	50 00%
#61		0	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#62		8	2	0	0	2	0	0	0	2	0	0	0	2	100 00%	100 00%
#63		0	12	0	0	12	0	0	0	12	0	0	0	12	100 00%	100 00%
#64		9	3	0	0	3	1	1	0	1	0	0	0	1	100.00%	100 00%
#65		0	85	0	0	85	20	9	1	55	14	12	2	41	74.55%	77 36%
#66		0	0	1	0	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#67		12	1	0	0	1	0	1	0	0	0	0	0	0	0.00%	0 00%
#68		2	7	0	0	7	2	3	1	1	0	0	0	1	100.00%	100 00%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																FLOWTHROUGH	
Company Info		LSR SUBMISSION					LSR PROCESSING										
		LEO					LESOG										
			Mechanized Interface Used				Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#69		273	402	0	0	402	138	18	53	193	112	97	15	81	41.97%	45 51%
#70		273	0	0	256	256	102	32	24	98	29	23	6	69	70.41%	75.00%
#71		0	1	0	0	1	0	1	0	0	0	0	0	0	0 00%	0 00%
#72		1	2	0	0	2	0	1	0	1	1	1	0	0	0.00%	0.00%
#73		0	0	0	3	3	2	0	0	1	1	1	0	0	0.00%	0 00%
#74		1	0	0	14	14	0	7	0	7	4	4	0	3	42.86%	42 86%
#75		0	0	0	1	1	1	0	0	0	0	0	0	0	0.00%	0 00%
#76		0	0	0	1	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#77		2	49	0	0	49	10	5	8	26	20	15	5	6	23.08%	28 57%
#78		6	1	0	0	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#79		3	22	0	0	22	1	5	3	13	12	8	4	1	7.69%	11.11%
#80		1	13	0	0	13	1	0	0	12	3	3	0	9	75.00%	75.00%
#81		1	1	0	0	1	1	0	0	0	0	0	0	0	0.00%	0.00%
#82		5	4	0	0	4	0	1	0	3	0	0	0	3	100 00%	100.00%
#83		0	2	0	0	2	2	0	0	0	0	0	0	0	0.00%	0 00%
#84		1	3	0	0	3	0	0	0	3	3	3	0	0	0.00%	0.00%
#85		16	14	0	0	14	0	0	4	10	3	1	2	7	70.00%	87.50%
#86		11	653	0	0	653	89	96	7	461	137	117	20	324	70.28%	73.47%
#87		1	6	0	0	6	3	0	0	3	3	3	0	0	0.00%	0 00%
#88		4	13	0	0	13	2	4	1	6	2	2	0	4	66.67%	66.67%
#89		69	0	0	2	2	0	0	0	2	0	0	0	2	100.00%	100 00%
#90		33	356	0	0	356	59	68	20	209	87	76	11	122	58.37%	61 62%
#91		15	3	0	0	3	1	0	0	2	0	0	0	2	100 00%	100 00%
#92		2	8	0	0	8	1	0	1	6	2	1	1	4	66.67%	80 00%
#93		4	2	0	0	2	1	0	0	1	1	1	0	0	0 00%	0.00%
#94		7	115	0	0	115	16	12	3	84	42	29	13	42	50.00%	59.15%
#95		0	3	0	0	3	0	0	0	3	0	0	0	3	100.00%	100.00%
#96		0	4	0	0	4	0	0	0	4	2	2	0	2	50 00%	50.00%
#97		0	4	0	0	4	0	0	1	3	2	2	0	1	33.33%	33.33%
#98		0	5	0	0	5	0	0	0	5	1	1	0	4	80.00%	80.00%
#99		0	4	0	0	4	1	0	0	3	1	1	0	2	66 67%	66.67%
#100		0	29	0	0	29	11	2	0	16	13	8	5	3	18 75%	27 27%
#101		0	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100.00%
#102		0	3	0	0	3	0	0	0	3	0	0	0	3	100.00%	100 00%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#103		0	4	0	0	4	0	1	0	3	3	2	1	0	0.00%	0 00%
#104		49	241	0	0	241	18	23	0	200	61	45	16	139	69.50%	75 54%
#105		49	0	1191	0	1191	644	85	70	392	157	117	40	235	59.95%	66 76%
#106		9	7	0	0	7	0	2	0	5	4	4	0	1	20.00%	20 00%
#107		9	0	0	283	283	37	37	1	208	78	68	10	130	62.50%	65.66%
#108		3	14	0	0	14	2	5	0	7	4	4	0	3	42.86%	42.86%
#109		0	3	0	0	3	0	0	0	3	1	1	0	2	66.67%	66.67%
#110		0	71	0	0	71	6	4	3	58	13	12	1	45	77.59%	78.95%
#111		0	1	0	0	1	0	0	0	1	0	0	0	1	100 00%	100 00%
#112		5	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#113		3	13	0	0	13	4	0	0	9	0	0	0	9	100.00%	100.00%
#114		0	12	0	0	12	0	1	0	11	2	2	0	9	81.82%	81.82%
#115		423	2	0	0	2	0	0	0	2	0	0	0	2	100.00%	100 00%
#116		0	3	0	0	3	0	1	0	2	0	0	0	2	100.00%	100.00%
#117		40	1226	0	0	1226	313	172	25	716	298	251	47	418	58.38%	62.48%
#118		40	0	13	0	13	9	3	0	1	1	1	0	0	0.00%	0 00%
#119		0	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#120		0	3	0	0	3	1	0	0	2	1	1	0	1	50.00%	50.00%
#121		5	2	0	0	2	2	0	0	0	0	0	0	0	0.00%	0 00%
#122		0	7	0	0	7	4	1	0	2	0	0	0	2	100.00%	100 00%
#123		0	17	0	0	17	6	0	0	11	1	1	0	10	90.91%	90.91%
#124		6	0	2	0	2	2	0	0	0	0	0	0	0	0 00%	0 00%
#125		39	76	0	0	76	14	8	6	48	18	18	0	30	62.50%	62.50%
#126		1	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100 00%
#127		3	7	0	0	7	5	0	0	2	2	2	0	0	0.00%	0 00%
#128		12	6	0	0	6	2	0	0	4	1	1	0	3	75.00%	75 00%
#129		6	0	0	2	2	1	0	0	1	0	0	0	1	100.00%	100.00%
#130		1	0	0	1	1	0	0	0	1	1	1	0	0	0.00%	0 00%
#131		0	17	0	0	17	2	1	1	13	4	4	0	9	69.23%	69 23%
#132		15	15	0	0	15	4	7	0	4	2	2	0	2	50.00%	50 00%
#133		23	75	0	0	75	19	14	5	37	21	14	7	16	43.24%	53.33%
#134		0	40	0	0	40	3	0	0	37	37	1	36	0	0.00%	0.00%
#135		6	156	0	0	156	31	28	7	90	43	42	1	47	52.22%	52 81%
#136		4	80	0	0	80	10	8	3	59	21	18	3	38	64.41%	67.86%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (BUSINESS DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#137		0	31	0	0	31	5	4	2	20	5	4	1	15	75.00%	78 95%
#138		0	31	0	0	31	3	8	1	19	8	7	1	11	57.89%	61 11%
#139		0	86	0	0	86	5	11	4	66	20	20	0	46	69.70%	69 70%
#140		0	2	0	0	2	0	2	0	0	0	0	0	0	0.00%	0.00%
#141		0	45	0	0	45	7	3	1	34	16	15	1	18	52.94%	54 55%
#142		0	118	0	0	118	12	23	5	78	48	42	6	30	38.46%	41.67%
#143		0	102	0	0	102	19	19	3	61	29	26	3	32	52 46%	55 17%
#144		2	230	0	0	230	48	17	1	164	66	58	8	98	59.76%	62.82%
#145		20	350	0	0	350	58	52	8	232	113	98	15	119	51.29%	54.84%
#146		0	5	0	0	5	0	0	0	5	5	1	4	0	0 00%	0.00%
#147		9	501	0	0	501	169	51	23	258	143	126	17	115	44 57%	47 72%
#148		24	5	0	0	5	0	1	0	4	3	3	0	1	25.00%	25.00%
#149		8	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%
#150		25	10	0	0	10	1	3	0	6	2	2	0	4	66.67%	66 67%
#151		5	95	0	0	95	20	10	3	62	36	34	2	26	41.94%	43 33%
#152		1	4	0	0	4	0	0	0	4	2	2	0	2	50 00%	50 00%
#153		2	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#154		0	2	0	0	2	0	0	0	2	2	1	1	0	0.00%	0.00%
LENS Subtotal		3748	9168	0	0	9168	1856	1236	351	5725	2554	2199	355	3171	55.39%	59.05%
EDI Subtotal		134	0	1221	0	1221	657	91	70	403	163	122	41	240	59.55%	66.30%
TAG Subtotal		2548	0	0	1056	1056	411	151	31	463	164	138	26	299	64.58%	68 42%
TOTAL INTERFACES		6430	9168	1221	1056	11445	2924	1478	452	6591	2881	2459	422	3710	56.29%	60.14%

ORDERING

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (UNE DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																
Company Info		LSR SUBMISSION					LSR PROCESSING								FLOWTHROUGH	
		LEO					LESOG									
			Mechanized Interface Used				Manual	Rejects		Validated	Errors					
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#1		3	0	24	0	24	4	7	3	10	10	9	1	0	0.00%	0.00%
#2		188	24	0	0	24	7	7	0	10	10	6	4	0	0.00%	0.00%
#3		188	0	0	48	48	5	37	0	6	6	2	4	0	0.00%	0.00%
#4		2000	1804	0	0	1804	173	222	38	1371	490	415	75	881	64.26%	67.98%
#5		2000	0	0	26979	26979	4748	3752	349	18130	4613	3656	957	13517	74.56%	78.71%
#6		21	0	104	0	104	79	2	0	23	19	17	2	4	17.39%	19 05%
#7		18	0	72	0	72	60	7	4	1	1	1	0	0	0.00%	0.00%
#8		0	2	0	0	2	0	0	2	0	0	0	0	0	0.00%	0 00%
#9		6	4	0	0	4	0	0	2	2	2	2	0	0	0.00%	0.00%
#10		5	2	0	0	2	0	0	1	1	1	1	0	0	0.00%	0.00%
#11		59	0	0	131	131	23	52	8	48	46	38	8	2	4.17%	5.00%
#12		1	1	0	0	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#13		1	0	0	1	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#14		9	0	201	0	201	142	34	14	11	10	10	0	1	9.09%	9.09%
#15		8	0	102	0	102	43	23	13	23	7	7	0	16	69 57%	69.57%
#16		0	0	3	0	3	2	0	0	1	1	1	0	0	0.00%	0.00%
#17		0	2	0	0	2	0	0	1	1	0	0	0	1	100.00%	100.00%
#18		0	2	0	0	2	0	0	0	2	2	2	0	0	0 00%	0.00%
#19		3	0	0	1	1	0	1	0	0	0	0	0	0	0.00%	0.00%
#20		12	5	0	0	5	0	0	1	4	4	1	3	0	0.00%	0.00%
#21		273	2830	0	0	2830	826	326	141	1537	718	657	61	819	53.29%	55.49%
#22		273	0	0	592	592	328	46	23	195	80	64	16	115	58.97%	64 25%
#23		11	68	0	0	68	15	7	20	26	26	25	1	0	0.00%	0.00%
#24		1	885	0	0	885	100	50	2	733	99	84	15	634	86.49%	88.30%
#25		78	0	0	1009	1009	504	36	72	397	374	335	39	23	5.79%	6.42%
#26		33	23	0	0	23	1	6	6	10	10	7	3	0	0.00%	0.00%
#27		3	91	0	0	91	55	5	3	28	18	18	0	10	35 71%	35 71%
#28		0	0	0	1	1	1	0	0	0	0	0	0	0	0.00%	0 00%
#29		49	0	10	0	10	0	4	5	1	1	0	1	0	0.00%	0.00%
#30		9	3	0	0	3	0	2	0	1	1	1	0	0	0.00%	0 00%
#31		9	0	0	1	1	0	0	0	1	1	1	0	0	0.00%	0.00%
#32		0	75	0	0	75	26	10	1	38	20	16	4	18	47.37%	52.94%
#33		30	0	92	0	92	49	23	13	7	6	2	4	1	14.29%	33 33%
#34		6	1	0	0	1	0	0	0	1	0	0	0	1	100.00%	100.00%

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (UNE DETAIL)
REPORT PERIOD: 09/01/00 - 09/30/00

GGREGATE ORDER TYPES																	
Company Info		LSR SUBMISSION					LSR PROCESSING									FLOWTHROUGH	
		LEO					LESOG										
			Mechanized Interface Used				Manual	Rejects		Validated	Errors						
Name	RESH / OCN	FATAL REJECTS	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
#35		0	30	0	0	30	0	0	0	30	9	9	0	21	70.00%	70.00%
#36		15	0	430	0	430	334	37	39	20	20	9	11	0	0.00%	0.00%
#37		11	0	200	0	200	137	28	20	15	12	11	1	3	20.00%	21.43%
#38		52	0	185	0	185	122	39	8	16	14	9	5	2	12.50%	18.18%
#39		0	8	0	0	8	2	1	1	4	1	1	0	3	75.00%	75.00%
#40		0	90	0	0	90	0	28	12	50	40	10	30	10	20.00%	50.00%
#41		0	4	0	0	4	0	0	1	3	3	2	1	0	0.00%	0.00%
#42		2	23	0	0	23	0	13	0	10	10	10	0	0	0.00%	0.00%
#43		24	679	0	0	679	124	90	6	459	168	139	29	291	63.40%	67.67%
#44		0	20	0	0	20	2	12	0	6	4	4	0	2	33.33%	33.33%
#45		8	130	0	0	130	21	20	3	86	52	42	10	34	39.53%	44.74%
#46		25	1039	0	0	1039	202	119	19	699	294	253	41	405	57.94%	61.55%
#47		5	34	0	0	34	8	7	2	17	17	12	5	0	0.00%	0.00%
#48		24	0	0	3	3	2	0	0	1	1	1	0	0	0.00%	0.00%
#49		25	0	0	15	15	8	1	0	6	2	2	0	4	66.67%	66.67%
LENS Subtotal		2612	7879	0	0	7879	1562	925	262	5130	2000	1718	282	3130	61.01%	64.56%
EDI Subtotal		216	0	1423	0	1423	972	204	119	128	101	76	25	27	21.09%	26.21%
TAG Subtotal		2660	0	0	28781	28781	5619	3926	452	18784	5123	4099	1024	13661	72.73%	76.92%
TOTAL INTERFACES		**5488**	**7879**	**1423**	**28781**	**38083**	**8153**	**5055**	**833**	**24042**	**7224**	**5893**	**1331**	**16818**	**69.95%**	**74.05%**

AGGREGATE ORDER TYPES					CAUSATION					
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CLEC Caused			BST Caused		
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
1000	4144	6 99%	6 99%	IF CHGING CLASS OF SERVICE ALL PERTINENT USOCS MUST BE POPULATED IN AND OUT	3612	87 16%	8 06%	532	12 84%	3 671%
7020	313	0 53%	7 51%	NUM= TELNO= TN NOT FOUND IN CRIS	310	99 04%	0 69%	3	0 96%	0 021%
7050	8	0 01%	7 53%	BOCRIS NOT AVAILABLE	2	25 00%	0 00%	6	75 00%	0 041%
7055	1689	2 85%	10 37%	NUM= TELNO= ACCOUNT IS FINAL	1671	98 93%	3 73%	18	1 07%	0 124%
7095	10	0 02%	10 39%	INCORRECT RATE ZONE DATA RECEIVED FROM RSAG	3	30 00%	0 01%	7	70 00%	0 048%
7100	4	0 01%	10 40%	PIC/LPIC IS REQUIRED ON INWARD ACTIVITY	4	100 00%	0 01%	0	0 00%	0 000%
7110	730	1 23%	11 63%	COFFI NOT AVAILABLE	174	23 84%	0 39%	556	76 16%	3 837%
7115	37	0 06%	11 69%	DSAP TELEPHONE NUMBER NOT ACTIVE/FOUND IN SITE	12	32 43%	0 03%	25	67 57%	0 173%
7145	13	0 02%	11 71%	INTERVAL BETWEEN DATE RECEIVED AND DDD IS INVALID	13	100 00%	0 03%	0	0 00%	0 000%
7150	8	0 01%	11 73%	UNE - ERROR GENERATING ECCKT	4	50 00%	0 01%	4	50 00%	0 028%
7225	169	0 28%	12 01%	USOC= EXC IS MISSING	169	100 00%	0 38%	0	0 00%	0 000%
7230	13	0 02%	12 03%	REFERENCE OF CALL OPTION NOT VALID FOR THIS ACCOUNT ACTIVITY TYPE	12	92 31%	0 03%	1	7 69%	0 007%
7235	460	0 78%	12 81%	10 DIGIT TN REQUIRED WITH USOC/FID=ZCRN	446	96 96%	0 99%	14	3 04%	0 097%
7245	406	0 68%	13 49%	NUM= ZCRT FID, DATA, OR DELIMITER IS MISSING	381	93 84%	0 85%	25	6 16%	0 173%
7250	487	0 82%	14 31%	LSR HOUSENUMBER INCORRECT	483	99 18%	1 08%	4	0 82%	0 028%
7255	11	0 02%	14 33%	NUM= TELNO= DEGREE OR PROF AFFILIATION NOT ALLOWED ON RESIDENTIAL SERVICE	11	100 00%	0 02%	0	0 00%	0 000%
7267	22	0 04%	14 37%	UNE - LOCBAN MISSING FOR LINP ORDER	21	95 45%	0 05%	1	4 55%	0 007%
7295	16	0 03%	14 40%	LINE CLASS OF SERVICE MISSING NUM AND TN REQUIRED	10	62 50%	0 02%	6	37 50%	0 041%
7300	6	0 01%	14 41%	UNE - CANNOT GENERATE CLASS OF SERVICE USOC	6	100 00%	0 01%	0	0 00%	0 000%
7315	111	0 19%	14 59%	CANNOT GENERATE BILLING NAME AND ADDRESS FIDS	89	80 18%	0 20%	22	19 82%	0 152%
7325	2	0 00%	14 60%	NUM= -TELNO= LISTING INSTRUCTION CODE IS MISSING	2	100 00%	0 00%	0	0 00%	0 000%
7360	15	0 03%	14 62%	LIFELINE SERVICE NOT AVAILABLE	5	33 33%	0 01%	10	66 67%	0 069%
7375	15	0 03%	14 65%	UNE - BOCABS SCREEN ERROR BOE001 6152612015 ACCOUNT NUMBER NOT FOUND	13	86 67%	0 03%	2	13 33%	0 014%
7380	65	0 11%	14 76%	UNE - ACTL INVALID	62	95 38%	0 14%	3	4 62%	0 021%
7400	3438	5 80%	20 55%	CLEC DOES NOT OWN THIS ACCOUNT	3384	98 43%	7 55%	54	1 57%	0 373%
7405	1	0 00%	20 56%	NUM= TELNO LISTING PHRASE CODE INVALID	0	0 00%	0 00%	1	100 00%	0 007%
7435	2620	4 42%	24 97%	WKG SVC - INPUT ADL, CONVSN ORD OR NOTE ABAND STA	2620	100 00%	5 84%	0	0 00%	0 000%
7445	19	0 03%	25 00%	UNE - CALL FORWARD TN REQUIRED	19	100 00%	0 04%	0	0 00%	0 000%
7465	1366	2 30%	27 31%	CANNOT CANCEL ORDER	803	58 78%	1 79%	563	41 22%	3 885%
7495	32	0 05%	27 36%	UNE - DIR LOCATOR PROBLEM	1	3 13%	0 00%	31	96 88%	0 214%
7500	44	0 07%	27 44%	DUE DATE COULD NOT BE DETERMINED	13	29 55%	0 03%	31	70 45%	0 214%
7555	109	0 18%	27 62%	FID MISSING IN FEATURE DETAIL	86	78 90%	0 19%	23	21 10%	0 159%
7570	1	0 00%	27 62%	SEQ1X NOT ALLOWED WITH ZNB	0	0 00%	0 00%	1	100 00%	0 007%
7640	4	0 01%	27 63%	DUPLICATE CUSTOMERS EXCEED NINE ON CSR	1	25 00%	0 00%	3	75 00%	0 021%
7645	867	1 46%	29 09%	MATCH IN CSR SA AND LSR HOUSENUM NOT FOUND	316	36 45%	0 70%	551	63 55%	3 803%
7660	35	0 06%	29 15%	USOC FUJ1X NOT FOR RESALE	35	100 00%	0 08%	0	0 00%	0 000%
7690	34	0 06%	29 21%	UNE - ACTL AND ENDUSER LSO MUST BE THE SAME FOR LOOP/LINP SERVICE	33	97 06%	0 07%	1	2 94%	0 007%
7710	349	0 59%	29 79%	CANNOT CANCEL OR CHANGE DUE DATE ON NON-EXISTENT ORDER	272	77 94%	0 61%	77	22 06%	0 531%

AGGREGATE ORDER TYPES											
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CAUSATION						
					CLEC Caused			BST Caused			
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
7715	132	0 22%	30 02%	SOCS TIMEOUT/NOT AVAILABLE	75	56 82%	0 17%	57	43 18%	0 393%
7718	989	1 67%	31 68%	UNABLE TO RETRIEVE PSO TO PROCESS SUP	394	39 84%	0 88%	595	60 16%	4 106%
7725	79	0 13%	31 82%	WAITING PERIOD EQUALS 5 MINUTES	16	20 25%	0 04%	63	79 75%	0 435%
7735	325	0 55%	32 37%	INVALID/MISSING LISTING NAME OR TYPE	325	100 00%	0 73%	0	0 00%	0 000%
7740	3	0 01%	32 37%	LOCAL CALLING PLUS INDICATOR NOT FOUND	3	100 00%	0 01%	0	0 00%	0 000%
7755	8	0 01%	32 38%	UNE - NPANXX NOT FOUND IN CLLI TABLE	4	50 00%	0 01%	4	50 00%	0 028%
7785	1256	2 12%	34 50%	RSAG SITE TABLE LOOKUP FAILED TO FIND A MATCH	220	17 52%	0 49%	1036	82 48%	7 150%
7805	185	0 31%	34 81%	SITE COULD NOT BE DETERMINED	125	67 57%	0 28%	60	32 43%	0 414%
7815	78	0 13%	34 94%	FID=RCU INVALID OR MISSING DATA	73	93 59%	0 16%	5	6 41%	0 035%
7850	3	0 01%	34 95%	RSAG - NEED ADDITIONAL ADDRESS OR TN	3	100 00%	0 01%	0	0 00%	0 000%
7860	715	1 21%	36 15%	RSAG - NO EXACT MATCH ON STREET NAME	713	99 72%	1 59%	2	0 28%	0 014%
7880	1	0 00%	36 16%	RSAG - NO MATCH ON TELEPHONE NUMBER	1	100 00%	0 00%	0	0 00%	0 000%
7890	203	0 34%	36 50%	RSAG - NO EXACT MATCH ON SUPPLEMENTAL ADDRESS	203	100 00%	0 45%	0	0 00%	0 000%
7900	69	0 12%	36 62%	RSAG - NO MATCH ON STREET NAME	69	100 00%	0 15%	0	0 00%	0 000%
7905	120	0 20%	36 82%	RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	118	98 33%	0 26%	2	1 67%	0 014%
7910	55	0 09%	36 91%	RSAG - NO MATCH ON EXACT STREET NAME	27	49 09%	0 06%	28	50 91%	0 193%
7935	5	0 01%	36 92%	RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP	5	100 00%	0 01%	0	0 00%	0 000%
7945	5	0 01%	36 93%	RSAG SYSTEM ERROR	4	80 00%	0 01%	1	20 00%	0 007%
8130	3	0 01%	36 93%	CONVERSION SPECIFIED CAN ONLY BE USED ON RETAIL TO UNE SERVICE	3	100 00%	0 01%	0	0 00%	0 000%
8150	2295	3 87%	40 80%	ORDER HAS BEEN REQUEUED FOR THE MAXIMUM NUMBER OF OCCURRENCES	514	22 40%	1 15%	1781	77 60%	12 291%
8167	97	0 16%	40 96%	INVALID USOC CHARACTER FORMAT SAE 013 I1 CREXI	96	98 97%	0 21%	1	1 03%	0 007%
8170	111	0 19%	41 15%	USOC MAY ONLY APPEAR ONCE FORMAT SAE 110 I1 CREX1 /TN 305 556-3023 /RMKR (A)	108	97 30%	0 24%	3	2 70%	0 021%
8173	99	0 17%	41 32%	INVALID CLASS OF SERVICE FORMAT IDNT 131 UEPRL=	98	98 99%	0 22%	1	1 01%	0 007%
8175	2244	3 78%	45 10%	USOC NOT AVAILABLE IN SWITCH FORMAT SAE 180N I1 ESXDC	2233	99 51%	4 98%	11	0 49%	0 076%
8177	46	0 08%	45 18%	USOC INVALID FOR THIS SWITCH FORMAT SAE 183 I1 TTR	45	97 83%	0 10%	1	2 17%	0 007%
8179	89	0 15%	45 33%	NPA NXX NOT VALID FORMAT SAE 184 I1 NXMCR	89	100 00%	0 20%	0	0 00%	0 000%
8180	50	0 08%	45 41%	CALL WAITING DELUXE USOC MUST CHANGE FORMAT SAE 312	50	100 00%	0 11%	0	0 00%	0 000%
8183	21	0 04%	45 45%	AREA CALLING PLAN USOC MISMATCH FORMAT 320 LINE UPP 0000000 / LINE ASSIGN 0	21	100 00%	0 05%	0	0 00%	0 000%
8187	966	1 63%	47 08%	USOC MAY NOT APPEAR ON REQUEST FORMAT SAE 431 T1 EMP1S /TN 305 824-9175	909	94 10%	2 03%	57	5 90%	0 393%
8189	1048	1 77%	48 84%	USOC IS NOT VALID ON BST FILE FORMAT SAE 433 I1 CREX6	1035	98 76%	2 31%	13	1 24%	0 090%
8190	805	1 36%	50 20%	INVALID USOC FOR BASIC CLASS OF SERVICE FORMAT SAE 434 I1 S98CP /TN 561 563-0	769	95 53%	1 72%	36	4 47%	0 248%
8193	4	0 01%	50 21%	USOC NOT VALID WITH CALLER ID FORMAT SAE 473 I1 NXMCR /TN 678 721-0276	4	100 00%	0 01%	0	0 00%	0 000%
8195	160	0 27%	50 48%	CALL FORWARDING USOC MUST NOT APPEAR FORMAT SAE 540 I1 GCJ /TN 706 548-542	160	100 00%	0 36%	0	0 00%	0 000%
8197	297	0 50%	50 98%	CALL FORWARDING USOC MUST APPEAR FORMAT SAE 541	295	99 33%	0 66%	2	0 67%	0 014%
8199	21	0 04%	51 01%	GCJRC/GCJ COMBINATION INVALID FORMAT SAE 560 I1 GCJRC /TN 704 867-7822 /PKG V	21	100 00%	0 05%	0	0 00%	0 000%
8204	190	0 32%	51 33%	BCR/NSS/NX8 INVALID USOC COMBINATION FORMAT SAE 575 R1 NSS /TN 704 359-9600	190	100 00%	0 42%	0	0 00%	0 000%
8207	139	0 23%	51 57%	BRD/NSQ/NX9 INVALID USOC COMBINATION FORMAT SAE 576 I1 NX9 /TN 504 447-1720	139	100 00%	0 31%	0	0 00%	0 000%
8209	213	0 36%	51 93%	USOC COMBINATION IS INVALID FORMAT SAE 587 I1 ESXDC /TN 901 327-7941	211	99 06%	0 47%	2	0 94%	0 014%

ORDERING

REPORT: FLOWTHROUGH ERROR ANALYSIS
REPORT PERIOD: 09/01/00 - 09/30/00

AGGREGATE ORDER TYPES					CAUSATION					
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CLEC Caused			BST Caused		
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
8240	165	0 28%	52 21%	INVALID LINE CLASS OF SVC FOR REQUESTED SERVICE	165	100 00%	0 37%	0	0 00%	0 000%
8250	8	0 01%	52 22%	USOC= NOT APPLICABLE TO PORT LOOP SERVICE	6	75 00%	0 01%	2	25 00%	0 014%
8415	9	0 02%	52 23%	LSF LP ALREADY EXISTS ON ACCOUNT	9	100 00%	0 02%	0	0 00%	0 000%
8425	9	0 02%	52 25%	LSF OF DE INVALID ON ACT TYPE A OR V	9	100 00%	0 02%	0	0 00%	0 000%
8820	329	0 55%	52 80%	SOCS ERROR LUD BILL 004 ACT CODE NOT FOR THIS ORD TYPE	113	34 35%	0 25%	216	65 65%	1 491%
8825	9967	16 80%	69 61%	ORDER ERR DR7Q1KL4 FORMAT SAE 996 O1 GCJ /TN 561 845-3932/RCYC 3 /ZSER 0E0	2482	24 90%	5 54%	7485	75 10%	51 656%
8830	539	0 91%	70.52%	CLEC ALREADY OWNS THIS ACCOUNT	528	97 96%	1 18%	11	2 04%	0 076%
8835	13	0 02%	70 54%	USOC/FID CANNOT BE DELETED FOR WORKING TN	13	100 00%	0 03%	0	0 00%	0 000%
8855	1	0 00%	70 54%	NO ACTL IN LSR	1	100 00%	0 00%	0	0 00%	0 000%
8875	200	0 34%	70 88%	ERROR GENERATING BTN	93	46 50%	0 21%	107	53 50%	0 738%
8885	5	0 01%	70 89%	LINE ACT IS V AND LINE IS NOT ON CUSTOMER RECORD	5	100 00%	0 01%	0	0 00%	0 000%
8925	2	0 00%	70 89%	CFN HAS INVALID FORMAT ON COFFI SCREEN	2	100 00%	0 00%	0	0 00%	0 000%
8940	302	0 51%	71 40%	CALL FORWARDING NUMBER MISSING OR INVALID	297	98 34%	0 66%	5	1 66%	0 035%
8970	3719	6 27%	77 67%	FID RCU WITH TWC FOUND ON SAME LINE AS 3-WAY CALLING USOC	3681	98 98%	8 21%	38	1 02%	0 262%
8980	9	0 02%	77 68%	LINE ACTIVITY INVALID	9	100 00%	0 02%	0	0 00%	0 000%
8995	4	0 01%	77 69%	SEMICOLON DISALLOWED WITH (+) SIGN IN PERSONAL NAME LISTINGS	4	100 00%	0 01%	0	0 00%	0 000%
9000	31	0 05%	77 74%	LSO/LOCBAN (NPANXX) MISSING OR INVALID	30	96 77%	0 07%	1	3 23%	0 007%
9005	2	0 00%	77 74%	LNECLSSVC NOT ALLOWED ON R ACCOUNT ACTIVITY	2	100 00%	0 00%	0	0 00%	0 000%
9015	37	0 06%	77 81%	SUP FAILED TO UPDATE DUE DATE	20	54 05%	0 04%	17	45 95%	0 117%
9030	6	0 01%	77 82%	PIC DATA OF A VALID PIC CODE OR NONE IS REQUIRED	6	100 00%	0 01%	0	0 00%	0 000%
9045	1	0 00%	77 82%	TYPE OF ORDER NOT DETERMINED - CLS SVC AND TOS BLANK OR MISSING	1	100 00%	0 00%	0	0 00%	0 000%
9060	4	0 01%	77 83%	EU-STREET-1 REQUIRED	4	100 00%	0 01%	0	0 00%	0 000%
9110	5	0 01%	77 83%	TELNO= PIC REQUIRED PER UNIQUE TELEPHONE NUMBER ON A, V, P9 LINE ACTIVITY	5	100 00%	0 01%	0	0 00%	0 000%
9115	5	0 01%	77 84%	TELNO= LPIC REQUIRED PER UNIQUE TELNO ON A, V, P9 LINE ACTIVITY TYPES	5	100 00%	0 01%	0	0 00%	0 000%
9155	10	0 02%	77 86%	UNE - PORTED OUT NUMBER	9	90 00%	0 02%	1	10 00%	0 007%
9160	60	0 10%	77 96%	LOCBAN INVALID FOR PORTED NUMBER ACTIVITY	60	100 00%	0 13%	0	0 00%	0 000%
9165	27	0 05%	78 01%	INVALID NPA NXX	27	100 00%	0 06%	0	0 00%	0 000%
9190	1	0 00%	78 01%	ZIP CODE IS NOT NUMERIC	1	100 00%	0 00%	0	0 00%	0 000%
9263	3	0 01%	78 01%	NC CODE IS A REQUIRED FIELD FOR LOOP REQUESTS	3	100 00%	0 01%	0	0 00%	0 000%
9438	5	0 01%	78 02%	DLNUM=0001 LTN= ACCOUNT ACTIVITY OF N CAN ONLY HAVE AN LACT OF N	5	100 00%	0 01%	0	0 00%	0 000%
9439	118	0 20%	78 22%	LTN= DISPOSITION OF LISTINGS ON MIGRATED LINES REQUIRED	118	100 00%	0 26%	0	0 00%	0 000%
9442	262	0 44%	78 66%	DLNUM=0002 LTN= ALI MUST BE UNIQUE	247	94 27%	0 55%	15	5 73%	0 104%
9466	29	0 05%	78 71%	UNABLE TO DETERMINE BLOCK CHOICE	29	100 00%	0 06%	0	0 00%	0 000%
9470	35	0 06%	78 77%	LOCATION QUANTITY DOES NOT EQUAL THE NUMBER OF END USER DETAIL RECORDS RE	34	97 14%	0 08%	1	2 86%	0 007%
9471	7	0 01%	78 78%	TOTAL QUANTITY OF VCA AND SCO SHOULD EQUAL IWJQ	6	85 71%	0 01%	1	14 29%	0 007%
9474	7	0 01%	78 79%	MINIMUM OF TWO DIFFERENT LEATNS/LEANS REQUIRED FOR LSR	6	85 71%	0 01%	1	14 29%	0 007%
9475	121	0 20%	79 00%	ACT= ALLOWED ONLY ON SAME LOCNUM SERVICE ADDRESS	118	97 52%	0 26%	3	2 48%	0 021%
9476	23	0 04%	79 04%	IS NOT FOUND ON CSR TO DISCONNECT	21	91 30%	0 05%	2	8 70%	0 014%

ORDERING

REPORT FLOWTHROUGH ERROR ANALYSIS
REPORT PERIOD: 09/01/00 - 09/30/00

AGGREGATE ORDER TYPES					CAUSATION					
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CLEC Caused			BST Caused		
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
9479	45	0 08%	79 11%	LNUM=00001 FEATURE DOES NOT EXIST ON ACCOUNT TO MODIFY	41	91 11%	0 09%	4	8.89%	0 028%
9481	393	0 66%	79 77%	LNUM=00001 FEATURE DOES NOT EXIST ON ACCOUNT TO DISCONNECT	381	96 95%	0 85%	12	3 05%	0 083%
9484	12	0 02%	79 79%	TNS= FOR LNUM=00001 ALREADY EXIST ON ATN=	8	66 67%	0 02%	4	33 33%	0 028%
9487	4	0 01%	79 80%	INVALID ACT TYPE FOR FULL MIGRATION	4	100 00%	0 01%	0	0 00%	0 000%
9488	279	0 47%	80 27%	DISPOSITION OF ALL LINES REQUIRED ON ACT V	272	97 49%	0 61%	7	2 51%	0 048%
9495	7	0 01%	80 28%	EATN= MUST EXIST FOR ACT P AND Q	6	85 71%	0 01%	1	14 29%	0 007%
9496	331	0 56%	80 84%	TNS=ON LNUM=00004 NOT FOUND ON EATN= FOR ACT=	318	96 07%	0 71%	13	3 93%	0 090%
9503	2	0 00%	80 85%	FA OF D AND C ARE DISALLOWED WHEN TNS IS NOT POPULATED FOR A LEATN	2	100 00%	0 00%	0	0 00%	0 000%
9510	1	0 00%	80 85%	ONLY ONE TC PER ALLOWED PER LOCATION	1	100 00%	0 00%	0	0 00%	0 000%
9515	926	1 56%	82 41%	WKG SVC-INPUT ADL, CONVERSION ORDER OR NOTE ABANDONED STATION	910	98 27%	2 03%	16	1 73%	0 110%
9516	24	0 04%	82 45%	WSOP OF V AND ADL NOT ALLOWED ON SAME ATN	23	95 83%	0 05%	1	4 17%	0 007%
9517	6	0 01%	82 46%	UNDC INVALID IF PIC ALREADY EXISTS	6	100 00%	0 01%	0	0 00%	0 000%
9519	333	0 56%	83 02%	LOCNUM= HNUM= HT= TN NOT FOUND ON CSR OR LSR	318	95 50%	0 71%	15	4 50%	0 104%
9523	7	0 01%	83 03%	LOCNUM=000 HNUM=00001 HT= MIXED NPA(S) ARE NOT ALLOWED FOR HUNTING IN THIS S	7	100 00%	0 02%	0	0 00%	0 000%
9526	3	0 01%	83 04%	BLOCK CHOICE DOES NOT EXIST ON ACCOUNT	3	100 00%	0 01%	0	0 00%	0 000%
9529	1080	1 82%	84 86%	CANNOT RESTORE A LINE WHICH IS NOT SUSPENDED/DENIED	1067	98 80%	2 38%	13	1 20%	0 090%
9543	27	0 05%	84 90%	LOCNUM= HNUM= HT= HT CANNOT BE IN MORE THAN ONE HID	26	96 30%	0 06%	1	3 70%	0 007%
9545	3	0 01%	84 91%	LOCNUM= HNUM=00001 HA OF D NOT ALLOWED	3	100 00%	0 01%	0	0 00%	0 000%
9602	2451	4 13%	89 04%	USOC=NSS ALREADY EXISTS ON CUSTOMER RECORD	2397	97 80%	5 35%	54	2 20%	0 373%
9605	131	0 22%	89 26%	USOC NOT FOR RESALE FORMAT SAE 959 T1 PGRAX /ZPGR 1 /RMKR (A)	123	93 89%	0 27%	8	6 11%	0 055%
9606	27	0 05%	89 31%	TNS CANNOT BE REASSIGNED FOR 90 DAYS	26	96 30%	0 06%	1	3 70%	0 007%
9616	13	0 02%	89 33%	YPH INVALID	13	100 00%	0 03%	0	0 00%	0 000%
9618	4	0 01%	89 34%	EQUAL NUMBER OF COMPLETE CHOICE AND COMPLETE CHOICE CREDIT USOCS REQUIRE	4	100 00%	0 01%	0	0 00%	0 000%
9626	65	0 11%	89.44%	CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP	64	98 46%	0 14%	1	1 54%	0 007%
9627	1506	2 54%	91 98%	ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	1480	98 27%	3 30%	26	1 73%	0 179%
9628	31	0 05%	92 04%	REQUEST DOES NOT QUALIFY FOR STAR 98 SERVICE	26	83 87%	0 06%	5	16 13%	0 035%
9629	3	0 01%	92 04%	CALL FORWARDING FID (CFND) AND CFND TN REQUIRED BEHIND USOC S98AF	3	100 00%	0 01%	0	0 00%	0 000%
9637	36	0 06%	92 10%	STAR 98 SERVICE IS NOT AVAILABLE FOR THIS CENTRAL OFFICE	36	100 00%	0 08%	0	0 00%	0 000%
9639	34	0 06%	92 16%	CATEGORY L USOC MUST APPEAR FOR SAME TN	34	100 00%	0 08%	0	0 00%	0 000%
9641	2401	4 05%	96 21%	REQUESTED ACTIVITY ALREADY PENDING DM4V32	2352	97 96%	5 25%	49	2 04%	0 338%
9643	1257	2 12%	98 33%	STAR 98 SERVICE NOT VALID ON THIS REQTYP/ACT TYPE COMBINATION	1244	98 97%	2 78%	13	1 03%	0 090%
9700	36	0 06%	98 39%	REQUESTED CIRCUIT NUMBER/ECCKT NOT FOUND	36	100 00%	0 08%	0	0 00%	0 000%
9770	1	0 00%	98 39%	UNE - CABLE ID/CHANNEL PAIR OR CFA IS REQUIRED FOR REQUESTED SERVICE	1	100 00%	0 00%	0	0 00%	0 000%
9772	5	0 01%	98 40%	UNE - ECCKT PROHIBITED WITH LINE ACTIVITY OF A	5	100 00%	0 01%	0	0 00%	0 000%
9800	54	0 09%	98 49%	MAIN LISTING REQUIRED FOR NEW ACCOUNT	54	100 00%	0 12%	0	0 00%	0 000%
9805	535	0 90%	99 39%	NO DENIAL INDICATOR ON CUSTOMER RECORD	535	100 00%	1 19%	0	0 00%	0 000%
9815	4	0 01%	99 40%	INVALID LINE ACTIVITY FOR DENIED ACCOUNT	4	100 00%	0 01%	0	0 00%	0 000%
9820	23	0 04%	99 44%	INVALID LINE ACTIVITY FOR SUSPENDED ACCOUNT	23	100 00%	0 05%	0	0 00%	0 000%

ORDERING

REPORT: FLOWTHROUGH ERROR ANALYSIS
REPORT PERIOD: 09/01/00 - 09/30/00

AGGREGATE ORDER TYPES										
ERROR DETAILS (Auto Clarifications (A) & Errors (E))					CAUSATION					
					CLEC Caused			BST Caused		
Error Type (by error code)	Count	%	Σ %	Error Description	Count	% of Agg	% of CLEC	Count	% of Agg	% of BST Caused
9860	335	0 56%	100 00%	UNABLE TO HANDLE REQUEST, ENDUSER ACCOUNT FROZEN	331	98 81%	0 74%	4	1 19%	0 028%
	59317	100 00%			44827		100 00%	14490		100 000%

ORDERING

REPORT: FLOWTHROUGH ERROR ANALYSIS
REPORT PERIOD: 09/01/00 - 09/30/00

AGGREGATE ORDER TYPES				
ERROR DETAILS (Fatal Errors)				
Error Type (by error code)	Count	%	Σ %	Error Description
1007	111	1.241%	1.241%	DUPLICATE CC, PON, VER
1012	43	0 481%	1.721%	CANNOT SUPP A PREVIOUSLY CANCELED LSR/PON
1015	2206	24.656%	26.378%	PON DUPLICATE ON INITIAL LSR
1017	6	0.067%	26.445%	PON VALID VALUES ARE UPPER CASE ALPHA A THRU Z, NUMERIC 0 THRU 9, AND SYMBOLS . , - '
1022	13	0.145%	26.590%	LSR ORIGINATING SOURCE NOT SAME AS PRIOR VERSION
1023	396	4.426%	31.016%	NO ORIGINAL LSR FOUND FOR THIS SUP
1025	23	0.257%	31.273%	VER MUST BE GREATER THAN PREVIOUS VERSION
1027	803	8.975%	40.248%	PREVIOUS LSR AGED OFF - (K) STATUS
1030	141	1 576%	41.824%	VER MUST BE GREATER THAN PREVIOUS VERSION
1032	2	0.022%	41.846%	VER MUST BE SPACES OR 00(ZEROS) FOR 850
1050	146	1.632%	43.478%	D/SENT - D/SENT CENTURY MUST BE CURRENT OR FUTURE DATE
1055	3	0.034%	43.512%	AN REQUIRED FOR THIS REQTYP/ACT TYPE COMBINATION WHEN ATN IS NOT POPULATED
1070	31	0.346%	43.858%	DDD/DDD-CC MUST BE CURRENT OR FUTURE DATE
1075	3	0.034%	43.892%	ATN REQUIRED WITH THIS REQTYP/ACT TYPE COMBINATION WHEN AN IS NOT POPULATED
1080	9	0.101%	43.992%	DDD/DDD-CC MUST BE A VALID DATE
1085	16	0.179%	44.171%	DDDO-CC/DDDO MUST BE CURRENT OR FUTURE DATE
1110	10	0.112%	44.283%	INVALID REQTYP - ACCOUNT ACTIVITY TYPE COMBINATION
1125	9	0.101%	44.384%	DDD MUST BE GREATER THAN OR EQUAL TO D/TSENT
1153	215	2.403%	46.787%	SUP NOT ALLOWED ON THIS ACCOUNT ACTIVITY TYPE
1154	279	3.118%	49.905%	LSR/PON IS COMPLETED
1157	3	0.034%	49.939%	DFDT PROHIBITED FOR THIS REQTYP/LNA COMBINATION
1170	10	0.112%	50 050%	CHC REQUIRED WHEN REQTYP IS A OR B AND DFDT IS POPULATED
1172	1	0.011%	50.061%	CC MUST BE 4 ALPHANUMERICS
1180	18	0.201%	50.263%	INVALID REQTYP/ACT TYPE COMBINATION (STOP EDIT)
1215	20	0.224%	50.486%	ACTL MUST BE 11 ALPHANUMERIC CHARACTERS
1220	1	0.011%	50.497%	LST MUST BE 11 ALPHA/NUMERIC CHARACTERS
1230	2	0.022%	50.520%	LSO MUST BE 6 NUMERICS
1270	1	0.011%	50 531%	SECNCI MUST BE A MINIMUM OF 5 ALPHANUMERIC CHARACTERS
1272	9	0.101%	50.631%	RPON VALID VALUES ARE UPPER CASE ALPHA A THRU Z, NUMERIC 0 THRU 9, AND SYMBOLS . , - '
1330	166	1.855%	52.487%	BAN1 MUST = E, N OR VALID BILLING ACCOUNT NUMBER FORMAT
1360	11	0.123%	52.610%	TOS SECOND CHARACTER MUST BE A, B, C, D, H, J, OR - (HYPHEN) (STOP EDIT)

AGGREGATE ORDER TYPES				
ERROR DETAILS (Fatal Errors)				
Error Type (by error code)	Count	%	Σ %	Error Description
1445	1	0.011%	52.621%	INITIATOR TELEPHONE NUMBER REQUIRED
1450	7	0.078%	52.699%	INITIATOR TELEPHONE NUMBER MUST BE A MINIMUM OF 10 NUMERICS
1490	1	0.011%	52.710%	DRC MUST BE 3 ALPHANUMERICS
1530	1	0.011%	52.722%	IMPCON REQUIRED WITH THIS REQTYP/ACT TYPE COMBINATION
1575	1	0.011%	52.733%	TEL NO DSGCON FORMAT MUST BE 10 NUMERICS IN THE FIRST TEN POSITIONS
1630	13	0.145%	52.878%	CANNOT SUP A PREVIOUSLY CANCELED LSR/PON
1635	193	2.157%	55.035%	LSR ORIGINATING SOURCE NOT SAME AS PRIOR VERSION
1640	225	2.515%	57.550%	NO ORIGINAL LSR FOUND FOR THIS SUP
1645	462	5.164%	62.714%	LSR/PON AGED OFF
1650	419	4.683%	67.397%	LSR/PON COMPLETED
1655	362	4.046%	71.443%	LSR ORIGINATING FORMAT (TCIF) NOT SAME AS ORIGINATING FORMAT
1660	1	0.011%	71.454%	SUP NOT ALLOWED ON THIS ACCOUNT ACTIVITY TYPE
1664	17	0.190%	71.644%	SUP 03 NOT ALLOWED ON THIS ACCOUNT ACTIVITY TYPE
2000	7	0.078%	71.722%	EU-NAME REQUIRED
2005	7	0.078%	71.801%	EU-STREET-1 REQUIRED
2010	14	0.156%	71.957%	EU-CITY REQUIRED
2015	7	0.078%	72.035%	EU-STATE REQUIRED
2020	22	0.246%	72.281%	LOCNUM= LOCNUM REQUIRED WITH THIS REQTYP.ACT TYPE COMBINATION AT THIS LOCATION
2025	186	2.079%	74.360%	EU-ZIP CODE REQUIRED
2030	2	0.022%	74.382%	LCON-TELNO MUST BE A MINIMUM OF 10 NUMERICS
2040	1	0.011%	74.394%	LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION
2060	1	0.011%	74.405%	LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION
2065	18	0.201%	74.606%	LOCBAN REQUIRED
2067	59	0.659%	75.265%	LOCBAN MUST BE 10 OR 13 ALPHANUMERICS
2115	5	0.056%	75.321%	FBCON-TELNO MUST BE MINIMUM OF 10 NUMERICS
2120	34	0.380%	75.701%	EATN, EAN, ATN OR AN ARE PROHIBITED ON THIS REQTYP/ACT CODE
2145	1	0.011%	75.713%	LOCBAN MUST EQUAL EAN OR EATN
2155	1	0.011%	75.724%	ATN MUST BE 10 NUMERICS
2165	1	0.011%	75.735%	EATN MUST BE 10 NUMERICS
2200	2	0.022%	75.757%	EATN MUST BE 10 NUMERICS
2285	7	0.078%	75.835%	LOCNUM= DNUM MUST BE 5 NUMERIC

AGGREGATE ORDER TYPES				
ERROR DETAILS (Fatal Errors)				
Error Type (by error code)	Count	%	Σ %	Error Description
2295	7	0.078%	75.914%	DNUM MUST BE GREATER THAN PREVIOUS DNUM
2350	3	0.034%	75.947%	ERL REQUIRED WITH THIS REQTYP/ACT TYPE COMBINATION
3005	1	0.011%	75.958%	REFNUM=001 -TELNO= REFNUM MUST BE 4 NUMERICS
3021	4	0.045%	76.003%	REFNUM=0002-TELNO= LNA MUST BE V OR W WHEN AN, ATN, EAN OR EATN IS POPULATED
3022	1	0.011%	76.014%	REFNUM=0001-TELNO= LNA MUST BE A OR D WITH THIS REQTYP/ACT TYPE
3030	37	0.414%	76.428%	REFNUM=0001-TELNO= TN MUST BE 10 NUMERICS
3035	2	0.022%	76.450%	REFNUM=0001-TELNO= OTN MUST BE 10 NUMERICS
3040	6	0.067%	76.517%	REFNUM=0001-TELNO= OTN PROHIBITED WHEN LNA = A, D, W, Y, L, P9
3045	2	0.022%	76.540%	REFNUM=0001 ECCKT MUST BE CLT, CLF OR CLS FORMAT
3050	4	0.045%	76.584%	LOCNUM=000 LNUM=00001 CFA FORMAT IS INVALID
3055	1	0.011%	76.596%	REFNUM=0001-TELNO= FPI MUST BE VALID VALUE FOR REQTYP AND ACTIVITY
3060	75	0.838%	77.434%	TELNO= PIC REQUIRED PER UNIQUE TELEPHONE NUMBER ON A, V, P9 LINE ACTIVITY TYPES
3065	27	0.302%	77.736%	TELNO= PIC VALID ENTRIES ARE PIC CODE OF 4 NUMERICS, NONE, DFLT, NA
3067	1	0.011%	77.747%	TELNO= PIC PROHIBITED ON R OR W ACT TYPES
3070	92	1.028%	78.775%	TELNO= LPIC DATA REQUIRED PER UNIQUE TELNO ON A, V, P9 ACTIVITY TYPES
3075	26	0.291%	79.066%	TELNO= VALID LPIC ENTRIES ARE AN LPIC CODE, NA OR NONE
3082	1	0.011%	79.077%	TELNO= LPIC PROHIBITED ON R OR W ACT TYPES
3085	51	0.570%	79.647%	TC OPT VALID ENTRIES ARE:00, 03, 05, 08, 21, 23, 25, 26, 31, 51, 81
3090	31	0.346%	79.993%	TC OPT PROHIBITED ON THIS ACT TYPE AND REQTYP
3115	2	0.022%	80.016%	TELNO= ECCKT IS PROHIBITED WITH REQTYP/ACT/LNA COMBINATION
3130	2	0.022%	80.038%	TC PER-CC/TC PER-DATE MUST BE CURRENT OR FUTURE DATE
3135	16	0.179%	80.217%	TC PER-CC/TC PER-DATE REQUIRED WHEN TCTO-PRIMARY FIELD IS POPULATED
3165	1	0.011%	80.228%	TBE PROHIBITED ON THIS ACTIVITY FOR THIS REQTYPE
3170	16	0.179%	80.407%	CFA INVALID FORMAT
3175	15	0.168%	80.574%	FA REQUIRED WHEN THE FEATURE FIELD IS POPULATED
3177	1	0.011%	80.586%	FA PROHIBITED WITH REQTYP J
3185	34	0.380%	80.966%	FEATURE REQUIRED WHEN THE FEATURE ACTIVITY IS POPULATED
3186	1	0.011%	80.977%	FEATURE PROHIBITED WITH REQTYP J
3190	102	1.140%	82.117%	LNECLSSVC MUST BE = 3 OR 5 ALPHANUMERICS
3195	2	0.022%	82.139%	LNECLSSVC REQUIRED ON ACT TYPE A OR V
3427	3	0.034%	82.173%	LNUM=00001 TELNO= LNA OF G PROHIBITED ON REQTYP/ACT TYP COMBINATION

ORDERING

REPORT: FLOWTHROUGH ERROR ANALYSIS
REPORT PERIOD: 09/01/00 - 09/30/00

AGGREGATE ORDER TYPES				
ERROR DETAILS (Fatal Errors)				
Error Type (by error code)	Count	%	Σ %	Error Description
3470	25	0.279%	82.452%	LOCNUM=000 LNUM=00001 TELNO=9017430735 LNUM MUST BE UNIQUE WITHIN EACH LOCNUM EXCEPT FOR REQTYP E-IS
3485	2	0.022%	82.475%	LOCNUM=001 LNUM=00001 LOCNUM DOES NOT MATCH AN END USER LOCNUM FOR THIS LSR
3580	9	0.101%	82.575%	PQTY REQUIRED WITH THIS REQTYP/LNA TYPE COMBINATION
3613	3	0 034%	82.609%	LOCNUM=000 LNUM=00001 TELNO= RTI REQUIRED ON REQTYP B WHEN LNA IS V AND NPT IS A OR C
3718	1	0.011%	82.620%	LOCNUM=000 LNUM=00010 TELNO=TNS RANGE NOT ALLOWED WHEN LNA IS G OR X
3735	66	0.738%	83.358%	PIC REQUIRED ON LNA G, N, P OR V
3745	27	0.302%	83.659%	PIC VALID ENTRIES ARE NONE, UNDC OR A VALID PIC CODE WHEN LNA IS G, N OR
3755	63	0.704%	84.363%	LPIC REQUIRED ON LNA G, N, P OR V
3765	14	0.156%	84.520%	WHEN LNA IS G, N
3930	1	0.011%	84.531%	BA VALID COMBINATIONS ARE A/D OR A/Z ONLY
3965	76	0.849%	85.381%	BLOCK INVALID WITH BA ENTRY OF N OR Z
4000	1	0.011%	85.392%	DL DATA ELEMENTS REQUIRED
4010	67	0.749%	86.141%	LIST REQUIRED WITH THIS REQTYPE AND ACTIVITY TYPE
4015	12	0.134%	86.275%	LIST MUST BE VALID ENTRY
4027	40	0.447%	86.722%	ASTERISK OR PLUS SIGN INVALID FOR LN
4028	152	1.699%	88.421%	COMMA OR SEMICOLON REQUIRED FOR RESIDENCE LISTING
4029	100	1.118%	89.538%	COMMA OR SEMICOLON REQUIRED FOR BUSINESS LISTING
4040	7	0.078%	89.617%	LISTED ADDRESS REQUIRED WITH THIS REQTYP AND ACTIVITY TYPE
4042	33	0.369%	89.985%	ASTERISK OR PLUS SIGN INVALID FOR LA
4050	55	0.615%	90.600%	INVALID YPH ENTRY
4052	33	0.369%	90.969%	YPH ENTRY MUST BE 999001 WHEN LISTING TYPE IS NL OR NP
4055	361	4.035%	95.004%	DLNUM=&DLNM LTN=&LTN ALI MUST BE UNIQUE
4060	1	0.011%	95.015%	VALID RTY REQUIRED
4075	1	0.011%	95.026%	MAIN LISTING REQUIRED
4097	1	0.011%	95.037%	LTY PROHIBITED WITH LACT Z
4110	2	0.022%	95.060%	VALID STYC CI, SH, SI, OR SL REQUIRED
4115	321	3.588%	98.648%	SIC REQUIRED WHEN FIRST CHARACTER OF TOS IS 1 OR 3
4120	2	0.022%	98.670%	DLNUM=0001 LTN=9044478110 TOA B, R, RP OR BP REQUIRED
4125	2	0.022%	98.692%	SIC MUST BE 4 NUMERICS
4160	3	0.034%	98 726%	DOI REQUIRED VALUE MUST BE 0 - 6
4165	1	0.011%	98.737%	DOI PROHIBITED WITH LACT Z

REPORT: FLOWTHROUGH ERROR ANALYSIS
REPORT PERIOD: 09/01/00 - 09/30/00

AGGREGATE ORDER TYPES				
ERROR DETAILS (Fatal Errors)				
Error Type (by error code)	Count	%	Σ %	Error Description
4180	1	0.011%	98.748%	DOI VALUE MUST BE ZERO
4225	1	0.011%	98.759%	LNLN PROHIBITED WITH LACT Z
4230	1	0.011%	98.771%	LNFN PROHIBITED WITH LACT Z
4240	1	0.011%	98.782%	LNPL PROHIBITED WITH LACT Z
4295	1	0.011%	98.793%	NICK PROHIBITED WITH LACT Z
4310	2	0.022%	98.815%	LANO PROHIBITED WITHOUT LASN
4315	1	0.011%	98.826%	LANO PROHIBITED WITH LACT Z
4345	1	0.011%	98.838%	LASN PROHIBITED WITH LACT Z
4350	1	0.011%	98.849%	LATH PROHIBITED WITH LACT Z
4385	1	0.011%	98.860%	INVALID LAST ENTRY
4470	3	0.034%	98.893%	LTXNUM MUST BE CONSECUTIVE AND UNIQUE WITHIN THE DLNUM
4585	1	0.011%	98.905%	DML PROHIBITED WITH LACT Z
4700	1	0.011%	98.916%	HS PROHIBITED WITH LACT OF Z
4740	8	0.089%	99.005%	DLNUM=0001 LTN= INS1 REQUIRED WHEN INTEXT OR INADDR IS POPULATED
4765	8	0.089%	99.095%	DLNUM=0001 LTN= SEQADDR1 REQUIRES SO1
4810	8	0.089%	99.184%	DLNUM=0001 LTN= INS1 REQUIRED WHEN INTEXT IS POPULATED
4825	8	0.089%	99.273%	DLNUM=0001 LTN= INS1 REQUIRED WHEN INADDR IS POPULATED
5015	11	0.123%	99.396%	HTQTY MUST EQUAL TOTAL NUMBER OF HNUM ON THIS REQUEST
5135	2	0.022%	99.419%	LOCNUM=000 HNUM=00001 HTSEQ=0005 SAME HT NOT ALLOWED IN MORE THAN ONE HTSEQ WHEN HLA IS N OR E
6005	14	0.156%	99.575%	NC CODE INVALID
6010	3	0.034%	99.609%	REFNUM=0004 -ECCKT REQUIRED WHEN ACT FIELD IS C, D, M, T OR R ON REQTYP'S A OR B
6030	1	0.011%	99.620%	SECNCI REQUIRED FOR NC
6045	16	0.179%	99.799%	INVALID NC/NCI/SECNCI COMBINATION (STOP EDIT)
6048	8	0.089%	99.888%	COMPANY IS NOT QUALIFIED FOR XDSL/UCL
6050	2	0.022%	99.911%	REQTYP/LOOP TYPE COMBINATION INVALID
6055	7	0.078%	99.989%	LQTY IS REQUIRED FOR REQTYP/ACT COMBINATION
8180	1	0.011%	100.000%	CALL WAITING DELUXE USOC MUST CHANGE. FORMAT SAE 312
8265	1	0.011%	100.011%	LNUM=12345 TC FR IS PROHIBITED WITH REQTYP/LNA COMBINATION
	8947	100.000%		

AGGREGATE ORDER TYPES

ERROR DETAILS - 8825

Error Type (by error code)	Error Description
8825	ORDER ERR: SA LIST 023 LIN STREET NAME FOR SA NOT VALID FOR NPA NXX!
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA
8825	ORDER ERR: CS IDNT 011 LIN USOC FOLLOWING CS IS INCORRECT! OCS 1FR
8825	ORDER ERR: LN LIST 010 LIN RECAPPED LN, NLST OR NP MAY NOT APPEAR! ILN (LNR) CROS
8825	ORDER ERR: DSA IDNT 010 LI DSA PRESENT - NEED CATEGORY L USOC OR SMV USOC!
8825	ORDER ERR: TN SAE 038 LINE TN OR TLI IS REQUIRED FOR INWARD CATEGORY D USOCS!
8825	ORDER ERR: PR SAE 010 LINE ZERO MUST NOT APPEAR AS FIRST CHARACTER! I1 UEAC2 /C
8825	ORDER ERR: PR SAE 010 LINE ZERO MUST NOT APPEAR AS FIRST CHARACTER! I1 UEAC2 /C
8825	ORDER ERR: PR SAE 010 LINE ZERO MUST NOT APPEAR AS FIRST CHARACTER! I1 UEAC2 /C
8825	ORDER ERR: ZLLU SAE 009 LI ZLLU MUST APPEAR!
8825	ORDER ERR: TYA BILL 008 LI TYA REQUIRED WITH SIC CODE OF 98XX
8825	ORDER ERR: LCON SAE 007 LI LCON FORMAT INCORRECT! IG2 CKL
8825	ORDER ERR: RCU SAE 009 LIN RCU CODESET INVALID! I1 1FR /TN
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1 DRS /TN
8825	ORDER ERR: DSA IDNT 009 LI DSA MUST APPEAR IN IDNT!
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1 DRS /TN
8825	ORDER ERR: ZLLU SAE 009 LI ZLLU MUST APPEAR!
8825	ORDER ERR: PKG SAE 010 LIN PKG NOT VALID ON THIS USOC! T1 1FB /TN
8825	ORDER ERR: RCU SAE 009 LIN RCU CODESET INVALID! I1 14R /TN
8825	ORDER ERR: CFND SAE 016 LI SEE SOER DOCUMENTATION! T1
8825	ORDER ERR: PKG SAE 010 LIN PKG NOT VALID ON THIS USOC! T1 1FB
8825	ORDER ERR: PIC SAE 012 LIN PIC MUST APPEAR ON I AND T ACTION CODED CATEGORY D USOC!
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: FORMAT SAE 389 I1 DRS /TN
8825	ORDER ERR: ZLLU SAE 009 LI ZLLU MUST APPEAR!
8825	ORDER ERR: NLST LIST 013 L SEE SOER DOCUMENTATION! INLST(NON-LIST) INTERPRINT EQUI
8825	ORDER ERR: LN LIST 010 LIN SEE SOER DOCUMENTATION! ILN
8825	ORDER ERR: RCU SAE 009 LIN RCU CODESET INVALID! I1 14R /
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!

AGGREGATE ORDER TYPES

ERROR DETAILS - 8825

Error Type (by error code)	Error Description
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: SS BILL 007 LIN SS DATA FORMAT INCORRECT! ISS
8825	ORDER ERR: SIC LIST 012 LI SIC CODE NOT ON BRIS SIC TABLE! ISIC 3047
8825	ORDER ERR: RESH BILL 023 L USOC BSX++ MAY NOT APPEAR!
8825	ORDER ERR: NP LIST 010 LIN SEE SOER DOCUMENTATION! INP (NON-PUB)
8825	ORDER ERR: NP LIST 010 LIN SEE SOER DOCUMENTATION! INP (NON-PUB)
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA
8825	ORDER ERR: FORMAT 374 LINE EUCLC: 0001 RELAY: 0000=
8825	ORDER ERR: ADL SAE 010 LIN ADL MUST APPEAR! I1
8825	ORDER ERR: LOC LIST 019 LI INVALID LAST CHARACTER FOR LEVELS 1-3! ILOC LOT 4 DES (
8825	ORDER ERR: SA LIST 023 LIN STREET NAME FOR SA NOT VALID FOR NPA NXX!
8825	ORDER ERR: NP LIST 010 LIN SEE SOER DOCUMENTATION! INP (NON-PUB)
8825	ORDER ERR: NP LIST 010 LIN SEE SOER DOCUMENTATION! INP (NON-PUB)
8825	ORDER ERR: PR SAE 010 LINE ZERO MUST NOT APPEAR AS FIRST CHARACTER! I1 UEAC2 /C
8825	ORDER ERR: LCON SAE 007 LI LCON FORMAT INCORRECT! CKL
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: ROUT LIST 007 L ROUT INVALID ON THIS ORDER!
8825	ORDER ERR: TYA BILL 008 LI TYA REQUIRED WITH SIC CODE OF 98XX
8825	ORDER ERR: PKG SAE 010 LIN PKG NOT VALID ON THIS USOC! T1
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1
8825	ORDER ERR: TCP TFC 007 LIN INVALID TCP DATE! TCP 06-13-00
8825	ORDER ERR: PDN IDNT 008 LI PDN MISSING OR DATA INCORRECT!
8825	ORDER ERR: DSA IDNT 009 LI DSA MUST APPEAR IN IDNT!
8825	ORDER ERR: RNP SAE 006 LIN SEE SOER DOCUMENTATION! I1
8825	ORDER ERR: ADL SAE 010 LIN ADL MUST APPEAR! I1 1FR /TN
8825	ORDER ERR: PCA SAE 013 LIN SEE SOER DOCUMENTATION! T1
8825	ORDER ERR: LA LIST 013 LIN SEE SOER DOCUMENTATION! ILA

AGGREGATE ORDER TYPES

ERROR DETAILS - 1000

Error Type (by error code)	Error Description
1000	CLEARED ERR BY ISSUING ORDER MANUALLY
1000	CLEARED SYSTEM ERRORS OSCOL AND UEAMC
1000	CLEARED UP SYSTEM ERRORS
1000	CLEARED ERROR FOR SYSTEM GENERATED ORDER#
1000	CORRECTED SYSTEM GENERATED ERRORS FOR ORDER#
1000	CLEANED UP SYSTEM ERRORS
1000	CANCEL PER CLEC.
1000	PUT IN E STATUS TO DROP OFF-ORD CANCELLED BY CLEC
1000	CLEARED ALL SYSTEM ERRORS IN DUE DATE CHANGE BY SYSTEM TO 070700
1000	ORDERDD 06-27-00 WORKED TO CHG LISTING
1000	PLACED IN E-STAT SUP 1 ON VER 1 THANKS
1000	ERR PLACED IN E-STAT SUP 1
1000	ERR CLEARED-ORDER ISS TO PROVIDE 1 LOOP
1000	CORRECT SYSTEM ERRORS
1000	CAN PER CLEC
1000	ERROR TO DROP, PON CANCELLED PER SUP 01
1000	EU NAME IS INCOMPLETE, PLS VERIFY AND RESUBMIT;
1000	CLEAN UP SYSTEM ERROR AND ADD SHELVES TO LOC FLR INFO
1000	CORRECTED SYSTEM ERRORS FOR ORDER#
1000	CORRECTED ERRORS ON ORDER BY REMOVING OCOSL & UEAMC WHICH SHOULD NOT BE ON LY-- REQUEST
1000	CLEARED ERROR FOR SYSTEM GENERATED ORDER, ORDER #
1000	ERROR TO DROP, UNABLE TO FORCE FOC ON C51RKDT0 CPX 06-08-00..
1000	ACCOUNT , SERVICE ORDER, DD 06-30-00
1000	ERROR TO DROP, UNABLE TO FORCE FOC ON
1000	CANCELLED ORDER PER SUP 1 LESOG
1000	CORRECT MAN CODE ON ROUTING ERROR MADE BY SYSTEM
1000	RECVD SUP 1 TO CANCEL
1000	CORRECT SYSTEM ERROS
1000	ERR PLACED IN E-STAT SUP 1 ON VER 1
1000	UPDATE TO CHANGE DUE DATE TO 6-27
1000	ERR PLACED IN E-STAT ORDER COMPLETED

AGGREGATE ORDER TYPES

ERROR DETAILS - 1000

Error Type (by error code)	Error Description
1000	CLEARED ERR FOR ORDER # , PON#,
1000	CORRECT SYSTEM ERRORS
1000	CORRECT SYSTEM ERRORS
1000	CLEARED ERROR FOR SYSTEM GENERATED ORDER #
1000	CLEARED ERROR
1000	CORRECT SVC ORDER BY REMOVING OCOSL & UEAMC-WHCH SHOULD NOT BE ON LY– RQST
1000	CORRECT ERRORS
1000	CORRECTED SYSTEM GENERATED ORDERS, ORDER#
1000	CORRECTED SYSTEM GENERATED ORDER #
1000	SENT S STATUS REFERAL FORM 06-20-00.
1000	ISS ORD C509GNJ6 DD 0703 ERR STAT 2 COR FOC-
1000	DD 2000-07-05
1000	ORDER CANCELLED
1000	CLAIMED IN ERROR
1000	ORDER PLACED IN ERROR BUCKET. RECORD ORD CPX B4 FOC WAS SENT.
1000	DD 06-14-00
1000	DD 07-06-00
1000	ORDER NY32B0F8 DOES NOT HAVE PON ON IT..
1000	DD 2000-07-05
1000	CORRECT SYSTEM ERRORS
1000	CLEAR UP SYSTEM ERRORS
1000	ERR TO DROP OFF, ORD
1000	ERR CLEARED-ORDER ISS TO PROVIDE 1 LOOP
1000	CORRECT SYSTEM ERRORS
1000	CORRECT SYSTEM PROBLEMS
1000	CLEARED UP SYSTEM ERRORS
1000	CLEARED ERRORS FROM ORDER TO FLOW THRU
1000	CLEAR SYSTEM ERRORS OCOSL AND DFDT
1000	CORRECT ON ODR NUMBER
1000	ORDER BY PLACING DFDT INFO IN PROPER PLACE AND REMOVING OCOSL (NOT VALID ON LY–ORDER)

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-25

This sheet transmits the

Change Request CR0012

which consists of 7 pages.

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Change Request Form

Internal Reference # _____(1) Date Change Request Submitted _4_/_18/_00(2)

☒ TYPE 5 (CLEC) ☐ TYPE 4 (BST) ☐ TYPE 3 (INDUSTRY) ☐ TYPE 2 (REGULATORY) (3)

☐ TYPE 6 (DEFECT) (3A)

Company Name____AT&T_____(4)

CCM___Jill Williamson_____(5) Phone__404-810-8562_____(6)

CCM Email Address _jrwilliamson@att.com_____(7) Fax____404-810-8605_____(8)

Alternate CCM_ _____(9) Alt Phone # _____(10)

Originator's Name __Jill Williamson_____(11) Phone__404-810-8562_____(12)

Title of Change __TAFI Functionality via ECTA Interface_____(13)

Category ☒ Add New Functionality ☐ Change Existing (14) Desired Due Date 10/01/00(15)

Originating CCM assessment of impact ☒ Major ☐ Minor ☐ None expected (16)

Originating CCM assessment of priority ☐ Urgent ☒ High ☐ Medium ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☐ LNP ☐ LENS ☐ TAG	☒ Maintenance ☐ TAFI ☒ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☒ Software	☐ Hardware	☐ Industry Standards	☐ Defect
☐ Product & Services	☐ New or Revised Edits	☐ Process	
☐ Documentation	☐ Regulatory	☐ Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

The existing ECTA Interface is designed to allow integration with a CLEC's own trouble reporting/administration system but provides only a limited set of functionality to CLECs and requires human intervention by BellSouth personnel to resolve all troubles. The TAFI system provides a much broader range of functions and allows many trouble reports to be resolved without human intervention by BellSouth personnel, but is human-to-machine in design when used by a CLEC. Thus a CLEC using TAFI must perform dual entry of its customers troubles and trouble resolutions in order to keep its own various customer records up to date.

In April of 1996 AT&T requested that BellSouth make the TAFI functionality available over the ECTA interface which would provide a fully featured and integrated interface reducing costs and improving customer service for both CLECs and BellSouth. The request has been open since then and has been discussed in many regulatory proceedings. BellSouth's representatives have repeatedly stated that such an interface is both desirable and technically feasible. In discussions before the FCC Staff in December 1998, BellSouth's representative stated that it could provide initial functionality in 13 months and

BELLSOUTH **Change Request Form**

complete functionality in 18 months. In the subsequent 15 months BellSouth has offered no TAFI functionality via the ECTA interface.

AT&T requests all TAFI functionality described in the TAFI User's Guide be provided via the ECTA interface. These functionalities include but are not limited to the following:

(i) enter a new end user trouble ticket into the BellSouth maintenance system for an AT&T end user;
(ii) retrieve and track current status on all AT&T end user repair tickets;
(iii) receive "estimated time to repair" ("ETTR") on a real-time basis;
(iv) receive timely notification in the event a repair person is unable to be present for, or anticipates missing, a scheduled repair opportunity;
(v) retrieve all applicable time and material charges at the time of ticket closure (itemized by time spent, price of materials used, procedures employed, amounts incurred in each subcategory, and total by end user, per event);
(vi) perform an electronic test at the time of ticket entry and provide test results to AT&T;
(vii) display products and services that are programmed on a line or port;
(viii) view pending orders associated with a line, port or circuit;
(ix) view the LMOS trouble report;
(x) query and view the current central office translations associated with a line or port;
(xi) view both abbreviated and extended trouble histories for a line, port or circuit;
(xii) view customer line record in LMOS; and
(xiii) add or delete features to a central office line or port.

Known dependencies (21)

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

This Section to be completed by BCCM only.

Change Request Log #_____CR0012_____(23) Clarification ☐ Yes ☐ No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status ___N_____(27)

Change Request Review Date __/__/__(28) Target Implementation Date ___/___/__ (29)

Last Modified By _____BCCM_____ (30) Date Modified 06/29/00_ (31)

Defect Validation Results: (32)

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Change Request Form

Change Review Meeting Results (33)

_____

_____

_____

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received

☐ Cancellation by BellSouth (34) _____

_____

Cancellation Acknowledgment CLEC _____ BST _____ Date _____ (35)

Request Appeal ☐ Yes ☐ No (36)

Appeal Considerations (37)

_____

_____

_____

Agreed Release Date ___/___/___ (38)

CMVC #_____(39)

DDTS#_____(40

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

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Change Request Form

Response to CR0012: TAFI Functionality via ECTA Interface

AT&T Local (the CLEC) initiated production utilization of the BellSouth ECTA interface on March 18, 1998. On April 9, 1998 AT&T Local terminated the use of this interface. Therefore, since AT&T Local is not an active ECTA user, this Change Request is not valid (e.g., only CLECs using the specific OSS interface can request a change in that interface).

AT&T Local has recently expressed some interest in resuming the utilization of ECTA and a technical review meeting is scheduled for May 4, 2000. Should AT&T Local resubmit this request after resuming the use of ECTA, it would not be accepted for the following reasons:

1. By design, TAFI and ECTA are functionally dissimilar systems. Specifically, TAFI is a real-time, artificial intelligence based, interactive man-to-machine interface that guides the user to efficiently processes non-designed telephone number based plain old telephone service (POTS) trouble reports. It was designed by BellSouth to improve customer service by mechanically performing the traditional screening function, and in many cases actually resolving the reported trouble condition, while the customer is still on the line. CLECs have had parity access to TAFI since March 28, 1997. TAFI does not require that a CLEC perform "dual entry" of customer troubles. The CLEC is responsible for determining the best method for maintaining its customer records. In 1999, 37.5% of all CLEC POTS trouble reports were entered by CLEC users into LMOS via TAFI. BellSouth has not received complaints about "dual entry" from any CLECs using TAFI.

2. BellSouth supports various National Standards for the mechanical exchange of information and ECTA is built on the ANSI standards T1.227, T1.228 and T1.262. These standards were defined by the Electronic Communications Implementation Committee (ECIC) for the exchange of maintenance and repair data. This "standard" interface mimics the traditional two-step repair process utilized in BellSouth prior to TAFI (and is still used by many ILECs). Specifically, [step 1] the customer contacts a call receipt center to report their problem and a repair attendant enters the report in the appropriate legacy system. The report is routed by the legacy system to the correct maintenance center where [step 2] a maintenance administrator determines the next course of action. The ANSI standards upon which ECTA is built do not support gathering all of the various data elements listed in this request nor do they support the real time interactive man-to-machine interface necessary to deliver true "TAFI functionality."

3. If AT&T requires additional functionality, ECIC needs to develop the appropriate standard methodology prior to BellSouth's consideration. For example, AT&T (along with other CLECs) requested the ability to run a MLT test on a POTS line (and obtain the results) without generating a trouble report. BellSouth took the lead at ECIC and helped develop ANSI standard T1.262 to provide this functionality. Effective October 28, 1999, the BellSouth ECTA gateway supports this added functionality. Currently at ECIC there is a team evaluating the methodology for delivering trouble history data. Once this becomes a "standard", BellSouth will consider adding it to the system. In other words, the vehicle for adding functionality to ECTA is by obtaining an ECIC standard methodology and not the BellSouth Change Request process. (If CLEC using ECTA wanted to reformat the returned data (i.e., screen out certain AVCs), then the BellSouth Change Request process would be applicable.)

4. The aforementioned ANSI standards prevent BellSouth from providing TAFI functionality via ECTA. As previously indicated to AT&T before the FCC Staff in December 1998, upon implementation of a Bona Fide Request (BFR) from AT&T, BellSouth can develop a **non-standard** integrated gateway

interface that will provide the various data elements and processing logic that emulate TAFI functionality. This interface would be an enhancement to our TAG API and, if pursued today, it would be delivered via the Corporate Gateway. To date, BellSouth has received no BFR from AT&T requesting this type of interface. The 13 and 18 month timelines referenced by AT&T in this request were based upon AT&T's timely submission of a BFR to BellSouth for a new, non-standard interface. BellSouth has made no assertions about enhancing ECTA to support TAFI functionality.

AT&T's list of TAFI functionalities is individually addressed below:

Note: TAFI today only processes POTS line trouble reports (and port/loop combos are treated as POTS) while ECTA will enter reports for all services (non-designed and designed services).

(i) enter a new end user trouble ticket into the BellSouth maintenance system for an AT&T end user;
TAFI and ECTA provide this function today

(ii) retrieve and track current status on all AT&T end user repair tickets;
ECTA today proactively returns status change messages to the Manager (AT&T's gateway) every time the status of an existing trouble ticket changes. The TAFI user must request status information manually by generating a subsequent report.

(iii) receive "estimated time to repair" ("ETTR") on a real-time basis;
TAFI and ECTA provide this function today.

(iv) receive timely notification in the event a repair person is unable to be present for, or anticipates missing, a scheduled repair opportunity;
AT&T was informed during recent Interconnection Agreement contract negotiations that this item is not a mechanized process and is handled via the OU (Operational Understanding agreement). TAFI has never done this and it is not listed in the TAFI User's Guide.

(v) retrieve all applicable time and material charges at the time of ticket closure (itemized by time spent, price of materials used, procedures employed, amounts incurred in each subcategory, and total by end user, per event);
During the initial ECTA JIA negotiations in 1997 AT&T was informed that this capability does not exist in BellSouth. There is no mechanical way to capture this data at the time of ticket closure and BellSouth does not perform this function for its own customers. AT&T has been informed during recent Interconnection Agreement contract negotiations that item is not a mechanized process. TAFI has never done this and it is not listed in the TAFI User's Guide.

(vi) perform an electronic test at the time of ticket entry and provide test results to AT&T;
TAFI will perform a MLT test if the trouble reported is a testable trouble (i.e., no dial tone). The results of the test will drive the resolution path for the report. The TAFI user could view the test results but doing so does not alter the processing of the report. ECTA (today) will also run an MLT test on a testable POTS report and will use the results to process the report. The VER code from the MLT test is also provided to the CLEC via an AVC. In addition, the CLEC today can request an MLT test and obtain the full test results without generating a trouble report (i.e., support for T1.262)

(vii) display products and services that are programmed on a line or port;
TAFI will display the Service and Equipment (S&E) section of the CRIS record listing which products and services are provided by BellSouth. ECTA does not. AT&T's system should list what products and services AT&T sold end user customer (and some may have been provided by an alternate provider).

(viii) view pending orders associated with a line, port or circuit;

TAFI will display pending service orders associated with a POTS line (or port/loop combination) when a trouble report is generated against the telephone number. The TAFI User's Guide does not state that TAFI will display pending orders for ports or circuits. ECTA does not provide this functionality today.

(ix) view the LMOS trouble report;

TAFI does provide a view of the LMOS TR screen but viewing this does not alter processing the report since all of the values are displayed in TAFI. Since the ECTA interface translates the ANSI standard codes into BellSouth codes, it would not be appropriate to display any legacy system information directly via this interface.

(x) query and view the current central office translations associated with a line or port;

TAFI will automatically query central office translation if the reported trouble is feature related. If a discrepancy between the switch translations and the CRIS record are found, TAFI will automatically correct the translations to match CRIS data. Querying central office translation is not available on demand. The ability to do this is part of the mechanized screening function is built into TAFI. By current standards, ECTA is limited to just entering the report, modifying an existing report, canceling a report and obtaining status information about the report.

(xi) view both abbreviated and extended trouble histories for a line, port or circuit;

TAFI will obtain and display both the DATH and DLETH history data from LMOS for a POTS line. The TAFI User's Guide does not state that TAFI will display trouble history data for ports or circuits. ECTA does not provide this functionality today. This issue is being worked at ECIC.

(xii) view customer line record in LMOS; and

TAFI provides the ability to view the LMOS line record (DLR) so that if a field technician were to call a BellSouth repair center for a specific cable and pair assignment, the BellSouth representative could provide this data without referring the technician to some other resource. For parity considerations, everything that a BellSouth user can see, a CLEC user can see in TAFI. However, since it is not part of BellSouth's maintenance process for a BellSouth technician to a CLEC to learn about BellSouth cable and pair assignments, the CLEC has no need for this information.

(xiii) add or delete features to a central office line or port.

TAFI will correct central office translation only when associated with a specific trouble report as described in number x. Adding or deleting features can only be done via the service order process. The ability to correct translation data is part of the mechanized screening function built into TAFI. By current standards, ECTA is limited to just entering the report, modifying an existing report, canceling a report and obtaining status information about the report.

In summary, based on the reasons stated above, this request is not accepted by BellSouth. By design, TAFI and ECTA systems are significantly different. ECTA is by definition and requirement a T1M1 standard, which does not support TAFI functionality.

There are several options available to AT&T:

1. AT&T could work through ECIC to provide a standard methodology to obtain additional data not currently supported and then BellSouth would evaluate implementing the new "standard" in ECTA. As stated in our response, BellSouth took the lead at ECIC for the development of the T1.262 standard (giving CLECs the ability to obtain a MLT test without generating a trouble report).
2. AT&T could submit a BonaFide Request (BFR) asking for a "non-standard" machine-to-machine

interface that emulates TAFI functionality. BellSouth would price and bill AT&T for any developments.

3. AT&T could use TAFI for TAFI functionality.