

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**REBUTTAL TESTIMONY OF
JAY M. BRADBURY
ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.,
AT&T BROADBAND PHONE OF FLORIDA, LLC,
AND TCG SOUTH FLORIDA, INC.**

DOCKET NO. 960786-TL

JULY 20, 2001

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FPSC-COMMISSION CLERK

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8 **DOCKET NO. 960786-TL**

9 **JULY 20, 2001**
10

11 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

12 **A.**My name is Jay M. Bradbury. My business address is 1200 Peachtree Street,
13 Suite 8100, Atlanta, Georgia 30309.

14
15 **Q. PLEASE DESCRIBE YOUR CURRENT POSITION AND**
16 **RESPONSIBILITIES.**

17 **A.**I am a District Manager in the AT&T Law and Government Affairs
18 organization, and I provide consulting support to AT&T's business units and
19 other internal organizations.

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

22 **A.**I graduated with a Bachelor of Arts degree in History from The Citadel in
23 1966. I have taken additional undergraduate and graduate courses at the

1 University of South Carolina and North Carolina State University in Business
2 and Economics. In 1987 and 1988, I participated in Advanced Management
3 Programs at Rutgers University and the University of Houston. I earned a
4 Masters Certificate in Project Management from Stevens Institute of
5 Technology in 2000.

6

7 I began my AT&T career in 1970 as a Chief Operator with Southern Bell's
8 Operator Services Department in Raleigh, North Carolina. From 1972
9 through 1987, I held various positions within Southern Bell's (1972 - 1984)
10 and AT&T's (1984 - 1987) Operator Services Departments where I was
11 responsible for the planning, engineering, implementation and administration
12 of personnel, processes and network equipment used to provide local and toll
13 operator services and directory assistance services in North Carolina, South
14 Carolina, Kentucky, Tennessee and Mississippi.

15

16 In 1987, I transferred to AT&T's External Affairs Department in Atlanta,
17 Georgia where I was responsible for managing AT&T's needs for access
18 network interfaces with South Central Bell, including the resolution of
19 operational performance, financial and policy issues. From 1989 through
20 November 1992, I was responsible for AT&T's relationships (including the
21 negotiation and administration of billing and marketing contracts, card
22 honoring contracts, facility contracts, and the support of sales of Network
23 Systems products) with Independent Telephone Companies within the South

1 Central Bell States and Florida. From November 1992 through April 1993, I
2 was a Regulatory Affairs Manager in the Law and Government Affairs
3 Division and was responsible for the analysis of industry proposals before
4 regulatory bodies in the South Central States to determine their impact on
5 AT&T's ability to meet its customers' needs with services that are
6 competitively priced and profitable.

7
8 In April of 1993, I transferred to the Access Management Organization
9 within AT&T's Network Services Division as a Manager - Access
10 Provisioning and Maintenance with responsibilities for on-going management
11 of processes and structures in place with Southwestern Bell to assure that
12 their access provisioning and maintenance performance met the needs of
13 AT&T's Strategic Business Units. In August 1995, I became responsible for
14 the negotiation and implementation of interfaces for operational support
15 systems ("OSS") necessary to support AT&T's entry into the local
16 telecommunications market in the BellSouth states. I assumed my current
17 position in June 1998.

- 18
19 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
20 **PROCEEDING?**
21 A. I am testifying on behalf of AT&T Communications of the Southern States,
22 Inc. regarding customized operator services and directory assistance
23 ("OS/DA") routing and branding. Customized OS/DA routing is included

1 under Issue 7 and customized OS/DA branding is included under Issue 8 of
2 the Commission's order regarding the issues to be addressed in this hearing.
3 In my testimony, I explain that BellSouth does not provide non-
4 discriminatory access to OS/DA because: (1) ALECs cannot order
5 customized OS/DA routing for a specific customer efficiently and effectively;
6 and (2) ALECs do not have access to equivalent OS/DA routing functionality
7 through the alternative Originating Line Number Screening ("OLNS")
8 technology offered by BellSouth. My testimony rebuts the testimony of
9 BellSouth witness W. Keith Milner.

10

11 **Q. WHAT IS CUSTOMIZED OPERATOR SERVICES AND**
12 **DIRECTORY ASSISTANCE ("OS/DA") ROUTING?**

13 A. Customized OS/DA routing provides ALECs the ability to obtain Operator
14 Services and Directory Assistance services from suppliers other than the
15 incumbent LEC, BellSouth in this case. Central office software, trunking
16 arrangements, and a customer-specific ordering process are required for
17 customized OS/DA routing.

18

19 **Q. WHAT TECHNOLOGY DOES BELL SOUTH OFFER TO PROVIDE**
20 **CUSTOMIZED ROUTING?**

21 A. BellSouth has proposed two technologies for providing customized routing:
22 Advanced Intelligent Network ("AIN") and Line Class Codes ("LCCs")¹.

¹ Milner, Direct testimony, page 79.

1 These technologies may also be used to route calls to BellSouth's own
2 OS/DA platform. In addition, BellSouth offers OLNS technology to
3 provided branded or unbranded OS/DA service from BellSouth's own OS/DA
4 platform.

5

6 **Q. WHAT MUST BELLSOUTH DEMONSTRATE IN ORDER TO**
7 **PROVE THAT IT “PROVIDES” CUSTOMIZED OS/DA ROUTING**
8 **AND SUPPORTING OSS?**

9 A. The FCC contemplated that a BOC would have to do much more than tell
10 competitive providers to contact an account team in order to “provide” a
11 checklist item. The FCC previously has discussed what it means for a Bell
12 Operating Company (“BOC”) to “provide” a checklist item. In its
13 Ameritech-Michigan 271 order, the FCC concluded that a BOC provides an
14 item if it “actually furnishes” the item, but if no competitor is actually using
15 the item, the BOC will be considered to provide the item if it “makes the
16 checklist item available as both a legal and a practical matter.” The FCC
17 further noted that “the mere fact that a BOC has ‘offered’ to provide checklist
18 items will not suffice” to establish compliance, instead, the “BOC must have
19 a concrete and specific legal obligation to furnish the item upon request
20 pursuant to state-approved interconnection agreements that set forth prices
21 and other terms and conditions for each checklist item.”²

22

² Ameritech-Michigan 271 order, pg. 110.

1

2 **Q. HAS THE FCC ADDRESSED THE ISSUE OF OS/DA ORDERING?**

3 A. Yes. The FCC has determined that ILECs, including BellSouth, must
4 provide customized routing as part of the switching function, unless they can
5 prove that customized routing in a particular switch is not technically
6 feasible.³ The FCC, moreover, anticipated that ALECs may have more than
7 one OS/DA routing option, and has previously instructed BellSouth to
8 simplify its ordering processes accordingly:

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

³ FCC Local Competition First Report and Order, 11 FCC Rcd at 15709.

⁴ The footnotes are equally instructive: Footnote 705 discusses the possibility that AT&T might want all its customers' calls routed in a single fashion:

For example, if AT&T wants all of its customers' calls routed to AT&T's operator services and directory assistance, AT&T should be able to tell this to BellSouth once, by letter for instance, and BellSouth should be able to

1

2

Thus, according to the FCC, ALECs are free to select more than one OS/DA

3

routing option, and BellSouth may not require the ALEC to provide actual

4

line class codes in order to obtain any OS/DA routing option if BellSouth is

5

capable of accepting a single code, or indicator, on a region-wide basis.

6

BellSouth witnesses have testified that BellSouth is, indeed, quite capable of

7

accepting a single region-wide code, or indicator, for each of the OS/DA

8

routings that may be requested by an ALEC.⁵ Exhibit JMB-1.

9

10 **Q. USING THE FCC'S STANDARD, HAS BELL SOUTH PROVIDED**

11 **CUSTOMIZED OS/DA ORDERING AND ITS SUPPORTING OSS?**

12

A. No. Specific, verifiable terms and conditions for ordering and

13

provisioning customized routing, including business rules and an electronic

14

ordering process (or even a documented manual ordering process) for

15

applying customized routing to specific customers simply do not exist.

route the calls without requiring AT&T to indicate this information on every order.

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

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

⁵ BellSouth has never even attempted to demonstrate that does not have this capability.

1 BellSouth has not demonstrated that ALECs can order and obtain customized
2 OS/DA routing as a practical matter.

3

4 **Q. PLEASE DESCRIBE BELLSOUTH'S POSITION ON PROVIDING**
5 **ELECTRONIC ORDERING FOR CUSTOMIZED OS/DA ROUTING.**

6 A. Apparently, BellSouth is willing to route OS/DA calls for all of the ALEC's
7 customers to one "default" option per state, based on the ALEC's "footprint"
8 order. However, if ALECs want to route the OS/DA calls of some customers
9 to one platform and other customers to a different platform, BellSouth's
10 position is that the ALEC's order must identify a yet-to-be-determined line
11 class code for the particular central office servicing that customer. Orders
12 that contained such an identifier would fall out to manual processing because
13 BellSouth's systems evidently cannot process line class codes. Thus, an
14 ALEC order for customized routings must go through two manual
15 translations -- the ALEC representative must translate the customer request
16 into a line class code, and then the LCSC representative must translate the
17 line class code into a SOCS-compatible format.⁶

18

19 In contrast, AT&T has requested that BellSouth assign a single unique
20 "indicator" for a particular routing option that ALECs could identify on the
21 order. In other words, AT&T has requested that BellSouth automate the
22 process. Instead of having two manual translations, BellSouth would

⁶ Milner, Direct testimony, pages 82-84.

1 program its OSS to translate the single unique indicator into a SOCS
2 compatible format.

3

4 **Q. GIVEN BELLSOUTH'S POSITION, HOW DO ALECS SUBMIT**
5 **ORDERS FOR CUSTOMIZED OS/DA ROUTING FOR**
6 **PARTICULAR CUSTOMERS?**

7 A. It is not clear. BellSouth has never provided the methods and
8 procedures necessary to order customized routing for specific customers. On
9 May 17, 2001, BellSouth published an ALEC Information Package entitled
10 "Selective Call Routing Using Line Class Codes." This document provides
11 to ALECs formal instructions for the establishment of the footprint order and
12 is based on work BellSouth's witness Keith Milner and I conducted as a part
13 of the AT&T arbitration. BellSouth included in this document two "Ordering
14 Information" paragraphs beginning on the bottom of page 8 that were not a
15 part of the effort in which I participated. In addition to being in conflict with
16 Mr. Milner's testimony filed in this docket⁷, the instructions offered are
17 confusing, inadequate, and impossible to implement.⁸ On July 13, 2001,
18 BellSouth published Version 2 of the information package (Exhibit JMB-4).
19 My review of BellSouth's changes finds them to be improved but still
20 inadequate.

21

⁷ Milner, Direct testimony, pages 82-84.

⁸ Indeed, KPMG cited these same instructions when it filed Exception 69 in the Florida third party test on June 12, 2001. That exception still remains open.

1

2 **Q. HAS THERE BEEN A RECENT CHANGE IN BELLSOUTH'S**
3 **POSITION?**

4 A. Yes. On July 16, 2001, Mr. Keith Milner of BellSouth, and I, acting as
5 subject matter experts in the AT&T interconnection agreement negotiations
6 agreed in principle to contract language that will allow AT&T to use region-
7 wide unique indicators to identify its choice of OS/DA routing option.

8

9 **Q. WHAT IS THE IMPACT OF THIS CHANGE IN POSITION?**

10 A. That of course remains to be seen. To meet its obligations under the Act,
11 BellSouth must successfully deliver the functionality described in the new
12 contract language. The FCC has made it clear that in situations such as this a
13 BOC must demonstrate present compliance with the Act.⁹ BellSouth's
14 existing customized OS/DA routing process is not compliant.

15

16 **Q. WHAT IS THE DIFFERENCE BETWEEN CUSTOMIZED OS/DA**
17 **ROUTING AND BRANDED/UNBRANDED OS/DA SERVICE?**

⁹ Memorandum and Opinion, *In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Michigan*, 12 FCC Rcd. 20,543 ¶ 55 (F.C.C. August 19, 1997) (No. CC97-137, FCC 97-298) ("*Ameritech Michigan Order*") "[w]e find that a BOC's promises of *future* performance to address particular concerns raised by commenters have no probative value in demonstrating its *present* compliance with the requirements of section 271. Paper promises do not, and cannot, satisfy a BOC's burden of proof (emphasis added)." More recently, the FCC stressed that "...a[n] RBOC, under all circumstances, retains the burden of demonstrating that it has "fully implemented the competitive checklist in subsection (c)(2)(B)." *Bell Atlantic New York Order* ¶ 44.

1 A. Customized OS/DA routing involves the technology necessary to route calls
2 to the specified platform, which typically would be the ALEC's OS/DA
3 platform. Providing branded or unbranded OS/DA services, on the other
4 hand, involves routing ALEC customer calls to BellSouth's OS/DA platform,
5 but in manner that enables BellSouth to provide ALEC branding or
6 unbranding for such calls.

7

8 **Q. WHAT TECHNOLOGY DOES BELLSOUTH UTILIZE TO PROVIDE**
9 **BRANDED OR UNBRANDED OS/DA SERVICE?**

10 A. LCCs and AIN can be used to provide this service. In addition, BellSouth
11 has designed and implemented Originating Line Number Screening
12 ("OLNS") technology as an alternative for routing ALEC OS/DA calls to
13 BellSouth's own platform and provide those calls with either "unbranded" or
14 ALEC-specific branding. AT&T has purchased OLNS for use in conjunction
15 with its UNE-P business market entry, and BellSouth implemented OLNS for
16 AT&T on May 19, 2001.

17

18 **Q. HAS BELLSOUTH'S IMPLEMENTATION OF OLNS**
19 **TECHNOLOGY PROVIDED ALECS WITH NON-**
20 **DISCRIMINATORY ACCESS TO BRANDED OR UNBRANDED**
21 **OS/DA SERVICE?**

1 A. No. Simple testing of BellSouth's OLNS revealed several initial defects,
2 including (a) the failure of BellSouth to remove completely the BellSouth
3 brand from the option menu; (b) long call set-up times; and (c) the failure of
4 BellSouth's operators to identify themselves as AT&T when handling OLNS
5 identified calls. BellSouth appears to have resolved these defects, but its
6 solution for the first defect has created a fourth defect. Now, AT&T's
7 customers are not provided call routing options that are equivalent to those
8 BellSouth provides its retail customers.

9
10 **Q. PLEASE EXPLAIN HOW AT&T'S CUSTOMERS ARE NOT**
11 **PROVIDED CALL ROUTING OPTIONS THAT ARE EQUIVALENT**
12 **TO THOSE BELLSOUTH PROVIDES ITS RETAIL CUSTOMERS?**

13 A. When BellSouth's retail customers dial "0," they are greeted with the
14 BellSouth brand and are provided with a menu of four options. By picking
15 one of the options, the BellSouth customer can choose to place a call, or to
16 have its call automatically routed to BellSouth's residence service and repair,
17 business service and repair, or a BellSouth operator.

18
19 In contrast, when AT&T's UNE-P business customers dial "0," they are
20 greeted with the AT&T brand, but are provided a menu of only two options.
21 AT&T's customers can choose to place a call, or have its call routed to
22 BellSouth's operator (branded as AT&T). AT&T's customers, however, are
23 not provided the options of having their calls automatically routed to AT&T's

1 residence or business service and repair. Instead, AT&T's customers either
2 have to look up the number and then dial it (which is much less convenient
3 than just pressing "2" or "3"), or they have to call the operator and have the
4 operator connect them (which is also much slower and results in an additional
5 charge to AT&T). Thus, BellSouth provides its retail customers with access
6 to superior OS/DA service than the OS/DA service that BellSouth makes
7 available to ALECs and their customers.

8
9 Initially, AT&T's customers were provided four menu options, but two of the
10 options were to have the call routed to "BellSouth residence service and
11 repair" and "BellSouth business service and repair." These BellSouth-
12 branded menu choices were obviously problematic because of the potential
13 for customer confusion and mis-routing of calls to BellSouth's service and
14 repair centers rather than AT&T's service and repair centers. Instead of
15 correcting the branding and routing defects, BellSouth simply eliminated the
16 options.

17
18 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

19 A. BellSouth has not satisfied 271 checklist items 6 and 7 (FPSC Issues 7 and 8)
20 because it does not provide non-discriminatory access to customized OS/DA
21 routing or customized OS/DA branding. Specifically, ALECs cannot order
22 customized OS/DA routing for a specific customer efficiently and effectively.
23 With respect to customized OS/DA branding; ALECs not provided call

1 routing options that are equivalent to those BellSouth provides its retail
2 customers.

3

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 A. Yes, it does.

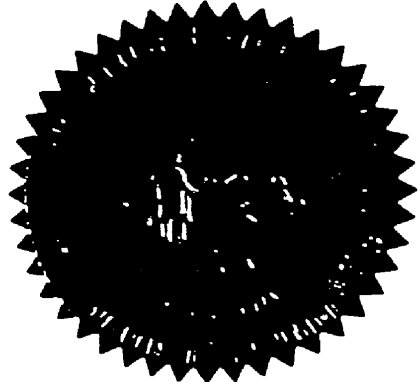
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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

DOCKET NO. 000731-TP

In the Matter of

**PETITION BY AT&T COMMUNI-
CATIONS OF THE SOUTHERN STATES,
D/B/A AT&T FOR ARBITRATION OF
CERTAIN TERMS AND CONDITIONS OF
A PROPOSED AGREEMENT WITH
BELLSOUTH COMMUNICATIONS, INC.
PURSUANT TO 47 U.S.C.
SECTION 252.**



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AND DO NOT INCLUDE PREFILED TESTIMONY.**

VOLUME 8

PAGES 1099 THROUGH 1253

PROCEEDINGS: HEARING

**BEFORE: CHAIRMAN E. LEON JACOBS, JR.
COMMISSIONER BRAULIO L. BAEZ
COMMISSIONER MICHAEL A. PALECKI**

DATE: Thursday, February 15, 2001

TIME: Commenced at 9:00 a.m.

**PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida**

**REPORTED BY: JANE FAUROT, RPR
FPSC Division of Records & Reporting
Chief, Bureau of Reporting**

APPEARANCES: (As heretofore noted.)

DOCUMENT NUMBER-DATE

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1 provide the specific line class code and put it on each
2 customer's order, is justified by the FCC's order that it
3 issued when it rejected BellSouth's second Louisiana 271
4 application, right?

5 A Yes. What the FCC said was if an ALEC has a
6 single routing plan for all its customers, which you could
7 read to mean all its customers in BellSouth's nine-state
8 region, then BellSouth should be able to figure out AT&T's
9 choice. And we agree. If they only have one choice and
10 AT&T says for all of my customers send it to any one of
11 these options, any one of those options, we will know what
12 to do. It's only where it becomes situational that we
13 don't know what to do and we need input from AT&T.

14 Q Well, the FCC also said that BellSouth should
15 not require the competitive LEC to provide the actual line
16 class code if BellSouth is capable of accepting a single
17 code region-wide, right?

18 A That's right. But that's back to the same –
19 back to the same logic, I think. Yes, we don't – and, in
20 fact, we don't ask you to put a line class code
21 designation on your order if we know what your choice is.
22 For example, in Atlanta, Georgia in BellSouth's Peachtree
23 Place central office, AT&T and BellSouth have worked
24 together, since we preprogram those line class codes, you
25 pass us an order that has got that single choice on it,

1 you don't have to specify a line class code and the order
2 flows-through well.

3 Q So the real nub here is that we disagree on what
4 the FCC meant in this order, right?

5 A Apparently so.

6 Q And BellSouth is capable of accepting a single
7 code region-wide to route to AT&T's operator service
8 platform, right?

9 A Yes.

10 Q Not a line class code, but an indicator?

11 A Well, yes. And in a fashion we are doing that
12 with what we have done for AT&T in BellSouth's Peachtree
13 Place central office. What we did was build logic into
14 part of the ordering system that told BellSouth based on
15 the class of service, the given central office, and the
16 blocking features that came across on AT&T's order, we
17 built those line class codes in a system called LESOG,
18 L-E-S-O-G.

19 That system looks in its tables and says, okay,
20 given that combination of class of service, blocking
21 levels, and the central office involved, this is the right
22 line class code to use. So that's what we are doing. And
23 we are in conformance with the FCC's requirement that we
24 take a single indicator. Your single indicator is you
25 have told us what your default plan is, and where you

EXCEPTION 69
BellSouth Florida OSS Testing Evaluation

Date: June 12, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

BellSouth does not provide an accurate method for assigning the Universal Service Order Code (USOC) to request BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature. (TVV1)

Background:

BellSouth's OS/DA Branding feature enables Competitive Local Exchange Companies (CLECs) to select Unbranded and/or Custom Branded Operator Services provided by BellSouth operators. Custom Branding identifies a CLEC-defined company name to the CLEC's end users, prior to being placed in queue, or prior to being connected to applicable operator services. The Unbranded option does not identify a specific company name when connecting a CLEC end user to an operator.

USOCs are codes used to identify features, and their associated tariffs, in a service request. BellSouth business rules specify, "The CLEC must float the ZSRC FID behind the Line Class of Service USOC followed by the Selective Routing Code in the feature detail field."¹

KPMG Consulting submitted a Selective Routing Service Inquiry form to the BellSouth Account Manager, and obtained Line Class of Service Codes and Selective Routing Codes to be used in association with the OS/DA service request as outlined in BellSouth's business rules.

Issue:

The instructions for identifying the Line Class of Service USOC on the Local Service Request (LSR) are incomplete. BellSouth does not provide feature "USOCs, FIDs, or TCIF maintained EDI codes" as required by the BellSouth business rules.²

¹ See *Selective Call Routing Using Line Class Codes CLEC Information Package*, Version 1, May 17, 2001, page 8. This document can be found at the following URL:

<http://www.interconnection.bellsouth.com/products/html/unes.html>

² See *BellSouth Business Rules for Local Ordering – OSS99, Issue 9N May 31, 2001*, pages 1567 & 1568.

This document can be found at the following URL:

<http://www.interconnection.bellsouth.com/guides/html/leo.html>

KPMG Consulting, Inc.

6/12/2001

Page 1 of 2



EXCEPTION 69
BellSouth Florida OSS Testing Evaluation

Without a feature code for an OS/DA feature, KPMG Consulting was unable to process the service requests, using any electronic interface. Service requests for OS/DA are rejected by BellSouth's front-end edits when the appropriate code on the feature code field of the Resale Service (RS) form is not specified.

Furthermore, the instructions on how to populate the feature detail field do not clearly indicate whether the ZSRC Field Identifier precedes the Line Class of Service USOC or not.

Impact:

BellSouth's incomplete instructions relating to USOCs for the OS/DA feature may impact a CLEC in the following ways:

- **Decrease in Customer Satisfaction.** A misidentification of a CLEC's operator assistance service might negatively impact a customer's view of a CLEC's service quality.
- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution might increase the effort CLEC resources must expend before successfully processing individual OS/DA service requests.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 69



Florida OSS Test
Exception #69

Exhibit JMB-3
FPSC Docket No. 960786-TL
Page 1 of 3

Date: July 2, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

BellSouth does not provide an accurate method for assigning the Universal Service Order Code (USOC) to request BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature. (TVV1)

Background:

BellSouth's OS/DA Branding feature enables Competitive Local Exchange Companies (CLECs) to select Unbranded and/or Custom Branded Operator Services provided by BellSouth operators. Custom Branding identifies a CLEC-defined company name to the CLEC's end users, prior to being placed in queue, or prior to being connected to applicable operator services. The Unbranded option does not identify a specific company name when connecting a CLEC end user to an operator.

USOCs are codes used to identify features, and their associated tariffs, in a service request. BellSouth business rules specify, "The CLEC must float the ZSRC FID behind the Line Class of Service USOC followed by the Selective Routing Code in the feature detail field."¹

KPMG Consulting submitted a Selective Routing Service Inquiry form to the BellSouth Account Manager, and obtained Line Class of Service Codes and Selective Routing Codes to be used in association with the OS/DA service request as outlined in BellSouth's business rules.

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<http://www.interconnection.bellsouth.com/products/html/unes.html>

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 69

Issue:

The instructions for identifying the Line Class of Service USOC on the Local Service Request (LSR) are incomplete. BellSouth does not provide feature "USOCs, FIDs, or TCIF maintained EDI codes" as required by the BellSouth business rules.²

Without a feature code for an OS/DA feature, KPMG Consulting was unable to process the service requests, using any electronic interface. Service requests for OS/DA are rejected by BellSouth's front-end edits when the appropriate code on the feature code field of the Resale Service (RS) form is not specified.

Furthermore, the instructions on how to populate the feature detail field do not clearly indicate whether the ZSRC Field Identifier precedes the Line Class of Service USOC or not.

Impact:

BellSouth's incomplete instructions relating to USOCs for the OS/DA feature may impact a CLEC in the following ways:

- **Decrease in Customer Satisfaction.** A misidentification of a CLEC's operator assistance service might negatively impact a customer's view of a CLEC's service quality.
- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution might increase the effort CLEC resources must expend before successfully processing individual OS/DA service requests.

BellSouth's Response:

BellSouth does provide the feature "USOCs, FIDs, or TCIF maintained EDI codes" as required by the BellSouth business rules. Documents containing "USOCs, FIDs, or TCIF maintained EDI codes" are available on the BellSouth Interconnection Services Customer Guides and Documentation web site by selecting Products/Services and Documentation or Unbundled Network Elements (UNE).

BellSouth documentation does not indicate "a feature code for an OS/DA feature" is required. BellSouth will need the specific document and page number referenced by KPMG that includes this information. BellSouth documentation does indicate the use of USOCs and FIDs populated in the FEATURE and FEATURE DETAIL fields for OS/DA service requests.

² See *BellSouth Business Rules for Local Ordering – OSS99, Issue 9N May 31, 2001*, pages 1567 & 1568. This document can be found at the following URL:
<http://www.interconnection.bellsouth.com/guides/html/leo.html>

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 69

KPMG should continue to populate USOCs in the FEATURE field as documented in the BellSouth Business Rules for Local Ordering. The Selective Routing Code (ZSRC) FID and the Line Class Codes assigned to KPMG for OS/DA should be populated in the FEATURE DETAIL field associated with the applicable FEATURE field. The use of FEATURE and FEATURE DETAIL fields remains consistent for OS/DA and other products/services.

Example: FEATURE IFR
 FEATURE DETAIL ZSRC XXXXX

The BellSouth CLEC Information Package, Selective Call Routing Using Line Class Codes will be updated by July 13, 2001 to clarify the terms Line Class of Service USOC and Basic Class of Service USOC.

Selective Call Routing Using Line Class Codes

**CLEC
Information Package**

June 13, 2001

(Version 2)

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Introduction and Scope

This Product Information Package is intended to provide to CLECs a product description and general ordering information specific to the service described herein.

Detailed ordering guidelines are provided in documents located on the BellSouth Interconnection Web site.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Account Manager, if you have any questions about the information contained herein.

Revisions

Version 2

Within the BellSouth Default Branding section of the Ordering Information section, clarification was made to include the 'Basic Class of Service' USOC as a possible USOC that the ZSRC FID may be floated behind. Further explanation was also provided to explain that the Line Class of Service USOC is the appropriate USOC that the ZSRC FID must be floated behind when ordering the service with complex services and UNE port/loop combinations.

Selective Call Routing Using Line Class Codes

Exhibit JMB-4
FPSC Docket No. 960786-TL
Page 5 of 16

Product Name

Selective Call Routing Using Line Class Codes

Service Description

BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature provides Unbranded and/or Custom Branded Operator Services provided by BellSouth operators to Competitive Local Exchange Companies (CLECs) reselling BellSouth telecommunications services (Reseller) or utilizing unbundled local switching (UNE Port CLEC). Custom Branding provides definable announcements to the CLEC's end users prior to placing them in queue or connecting them to an available operator or Automated Operator System. The BellSouth provided Unbranded option does not identify a specific company brand name when connecting the end user to an operator.

Selective Call Routing using Line Class Codes (SCR-LCC) provides the capability for a CLEC to have its OS/DA calls routed to BellSouth's OS/DA platform for BellSouth provided Custom Branded or Unbranded OS/DA or to its own or an alternate OS/DA platform for Self-Branded OS/DA. SCR-LCC is only available if line class code capacity is available in the requested BellSouth end office switches.

Where available, CLEC-specific and unique line class codes are programmed in each BellSouth end office switch where the CLEC intends to serve end users with customized OS/DA branding. The line class codes specifically identify the CLEC's end users so OS/DA calls can be routed over the appropriate trunk group to the requested OS/DA platform. Additional line class codes are required in each end office if the end office serves multiple NPAs (i.e., a unique LCC is required per NPA), and/or if the end office switch serves multiple rate areas and the CLEC intends to provide CLEC-branded OS/DA to its end users in these multiple rate areas.

CLEC dedicated trunking is required and must be ordered from each end office to the BellSouth TOPs tandem for Custom Branded OS/DA and to the appropriate point of interface for Self-Branded OS/DA. BellSouth will provide the trunking on shared trunk groups for Unbranded OS/DA.

In addition to supporting selective routing for customized OS/DA branding, line class codes are also utilized to provision end user specific call blocking/restrictions, optional dialing plans, measured versus flat rate pricing plans and multi-line hunting in 5E switches. Therefore, the CLEC-specific line class codes must be programmed to include the handling of these services as well as specific OS/DA branding. The SCR-LCC ordering forms will prompt the CLEC to choose if such other services will be needed and allow such services to be listed on the service request.

When utilizing SCR-LCC to establish an OS/DA branding option, the CLEC may select one of two types of OS/DA Branding Defaults. The Branding Default applies when no specific OS/DA branding instructions are provided on the Local Service Request (LSR). The CLEC may select the Standard OS/DA Branding Default, which is BellSouth, or it may select a Customized Branding

Selective Call Routing Using Line Class Codes

Default. Specific instructions and requirements concerning the Branding Default are explained further in this guide.

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Pre-Ordering

Availability

The availability of this service is dependent on the specific terms of the contract between BellSouth and the CLEC. Furthermore, this service is offered on a first come, first serve basis and is dependent on the availability of Line Class Codes in the requested BellSouth switch.

Pre-Ordering Applications (included within this guide)

1. CLEC Selective Routing Service Inquiry
2. CLEC Selective Routing Ordering Document
3. Selective Routing End Office Detail Information

CLEC Selective Routing Service Inquiry

The CLEC notifies BellSouth of its intent to order SCR-LCC for OS/DA Branding by submitting the CLEC Selective Routing Service Inquiry form. On this form, the CLEC must include its desired due date, contact information, form issuance date, CLLI codes of the BellSouth end offices where it desires SCR, the NPA that will be affected by SCR and the number of Line Class Codes desired for that CLLI/NPA combination. If the CLEC desires multiple NPAs in a CLLI to be affected by SCR, each CLLI/NPA combination will need to be listed on an individual line and unique Line Class Codes for such combinations will be necessary.

The number of Line Class Codes to be listed on this form will be determined by the completion of the CLEC Selective Routing Ordering Document.

CLEC Selective Routing Ordering Document

This form must be completed and submitted to the CLEC's Account Team along with the CLEC Selective Routing Service Inquiry. This form must be provided for each BellSouth end office where the CLEC desires SCR-LCC. In addition to the CLEC's contact information, end office CLLI code and state, the following fields must be completed:

1. **Option** – This field identifies the call blocking/restriction (CREX) option desired for the Line Class Code. Each option requires its own unique Line Class Code. Refer to the tables on page 3 for the possible Option choices. If a CREX option is not requested to apply with specific OS/DA branding and therefore unique Line Class Codes are not established, that CREX option shall not be able to be ordered with CLEC-specific OS/DA Branding.
2. **NPA** – This field identifies the desired NPA to be affected by SCR-LCC. Each NPA per CLLI requires its own line on this form or unique Line Class Code.

Selective Call Routing Using Line Class Codes

3. **Line Class** – This field identifies the Line Class of Service that will be affected by SCR-LCC. Refer to page 4 for possible selections. POTS should be selected for Residential and Business unbundled ports, port/loop switched combinations and UNE-P.
4. **ODP (Optional Dialing Plan) (Y/N)** – BellSouth provisioned optional dialing plans require unique Line Class Codes. If the CLEC desires SCR-LCC for UNE port or Resale USOCs that include optional dialing plans, then “Yes” should be listed in this field. Furthermore, “No” should be listed if the CLEC desires SCR-LCC to affect only basic dialing plans.
5. **Flat/Meas (Flat or Measured Service)** – This field identifies whether the service is flat rated or measured rated, as separate Line Class Codes are required for each. Unbundled ports, switched port/loop combinations and UNE-P are measured services. Resale, however, may be a measured or flat service. For example, Resellers desiring SCR-LCC on a resold 1FR must request flat rated Line Class Codes. Additionally, measured Line Class Codes may be used for measured Resale services and unbundled ports, switched port/loop combinations and UNE-P.
6. **MLH Hunt (Multi-line Hunting) (Y/N)** – Multi-line Hunting requires unique Line Class Codes in 5E switches. If Multi-line Hunting is desired select “Yes” and if it is not select “No”. If both options are desired, then separate lines will need to be completed. If the applicable BellSouth switch is not a 5E, then completing this field is not necessary.
7. **0- Brand 1/2/3/4** – This field allows the CLEC to select the level of 0- branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded.
8. **DA Brand 1/2/3/4** - This field allows the CLEC to select the level of DA branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded.
9. **0+ Local Brand 1/2/3/4** - This field allows the CLEC to select the level of 0+ Local branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded. 0+ intralata toll calls and 0+ interlata toll calls shall be routed to the end user's LPIC'd and PIC'd carriers respectively.
10. **611 Customized Routing** – This field allows the CLEC to select SCR to its own platform for its end user dialed 611 calls. For BellSouth retail end users in Georgia, Florida, North Carolina and South Carolina, 611 is BellSouth's repair line. This capability is only offered in these states and applies only to Self Branding OS/DA. Select “Yes” if 611 SCR is desired and “No” if it is not.
11. **Default Branding** - The Standard Default Branding for SCR-LCC is BellSouth Branding if no branding is identified on the CLEC's Local Service Request (LSR). However, the CLEC may choose to have Customized Default Branding. This allows a CLEC to select a single specific OS/DA branding option by class of service and such arrangement shall be provided as the default, meaning that such branding shall be provided without specific



Selective Call Routing Using Line Class Codes

instructions placed in the LSR. Customized Default Branding requires BellSouth to program its ordering systems and will take three to six months to develop for each request.

Within this field, list either BellSouth or Customized for each Line Class of service. For POTS, the branding option may be divided between residence and business and should be listed accordingly (e.g. Residence – BellSouth).

Each line completed on the CLEC Selective Routing Ordering Document, results in a unique Line Class Code. The sum of the Line Class Codes for each CLLI should be populated accordingly on the CLEC Selective Routing Service Inquiry.

Upon submitting these two forms to the BellSouth Account Team, BellSouth will determine if the quantity of requested Line Class Codes are available in the requested BellSouth end office switches. If they are and if the CLEC is establishing Custom Branded or Self Branded OS/DA, at this point the CLEC must order dedicated OS/DA trunking with MOSS signaling from the applicable BellSouth end offices to the appropriate BellSouth or alternate service provider OS/DA platforms. This must be complete before the Line Class Codes are built in the BellSouth end office switches, as they must be directed to specific trunk groups and tested.

Selective Routing End Office Detail Information Form

If dedicated trunking is required and once it has been established, the Selective Routing End Office Detail Information Form must be completed and submitted to the Account Team. Each Two-Six code for 0-, 0+ Local, DA and 611 for each CLLI/NPA combination must be listed on this form. This provides the information necessary for BellSouth to direct the appropriate Lines Class Codes to the appropriate trunk groups.

Once the Line Class Codes have been established, BellSouth will provide to the CLEC the Selective Routing Codes used in each CLLI for each option by returning the CLEC Selective Routing Ordering Document.

Ordering Information

BellSouth Default Branding

When choosing BellSouth Default Branding (i.e. BellSouth OS/DA branding is applied when no OS/DA branding instructions are placed on the LSR), specific information is required on the LSR in order to receive the desired OS/DA Branding when ordering. The CLEC must float the **ZSRC FID** behind the **Basic Class of Service/Line Class of Service USOC** followed by the **Selective Routing Code** in the feature detail field. Again, the **Selective Routing Codes** will be provided by the BellSouth Account Team during the provisioning of this service. For complex services and UNE Port/Loop switched combination services, the ZSRC FID follows the Line Class of Service USOC.



Selective Call Routing Using Line Class Codes

CREX codes for specific call blocking and restrictions should not be placed on the LSR with this option as such desired functionalities shall be accommodated by the Selective Routing Code. If a CREX code was not requested as an option when requesting an Selective Routing Code, it may not be ordered to apply to an OS/DA branding option. Such requests will be rejected.

Customized Default Branding

When choosing Customized Default Branding, no specific OS/DA branding instructions are required on the LSR when ordering, and the CLEC desired OS/DA branding shall be applied to the end user's service. With this option the CLEC must place CREX codes that have corresponding Selective Routing Codes on the LSR in order for BellSouth to determine which Selective Routing Codes to automatically apply to the end user's line. If a CREX code is ordered and a corresponding Selective Routing Code has not been established by the CLEC, the order shall be rejected.

Billing Information

- The CLEC must provide BellSouth with a Facility-based OCN and have requested a facilities based Q-account number through its Account team before ordering this service.
- Current BellSouth Billing Account establishment rules require an OS/DA Branding option for each Master Q Account. This service, however, is defined to provide the CLEC the functionality to select multiple branding options within the Master Q Account (but no lower than the Earning Account), as multiple types of service may apply to that single Master Q Account. Therefore, until system changes can be completed, the bill phrase as well as the branding information on the CSR shall reflect the branding option residing on the Master Q Account. The CLEC should refer to the Selective Routing Codes on the CSR to identify the exact type of branding.

Pricing

The specific charges for this service are listed in the Interconnection Agreement between the Parties. There is a nonrecurring charge for the establishment of each Line Class Code in each BellSouth central office. Furthermore, for Unbranded and Custom Branded OS/DA provided by BellSouth Operator Services with unbundled ports, unbundled port/loop switch combinations and UNE-P, monthly recurring usage charges shall apply for the UNEs necessary to provide the service, such as end office and tandem switching and common transport. A flat rated end office switching charge shall apply to Self-Branded OS/DA when used in conjunction with unbundled ports, unbundled port/loop switch combinations and UNE-P.

BELLSOUTH

CLEC Selective Routing Service Inquiry

Customer's Desired Due Date (MMDDYYYY)			Issue Date (MMDDYYYY)			INQUIRY Number (PON Number)		
Account Exec. Name					(Area Code) Telephone Number		(Area Code) Fax Number	
Customer Name					(Area Code) Telephone Number		(Area Code) Fax Number	
Originator Name					(Area Code) Telephone Number		(Area Code) Fax Number	
State					NISC USE ONLY			
CLLI	NPA	Number of LCC's Desired (See Note 1)		Number of Rate Centers	Capacity Available (Y,N)	Maximum Available (See Note 2)		

1. Note to NISC-CTG: Refer to BSP 900-100-820BT for LCC Reservation Provisioning & Turn-Up Details.
2. If capacity not sufficient to support all requested LCC(s), indicate maximum available.
3. Use additional sheets as needed.

BellSouth

CLEC

Selective Routing Ordering Document

Customer Name				(Area Code) Telephone Number				(Area Code) Fax Number						
Account Exec Name				(Area Code) Telephone Number				(Area Code) Fax Number						
CLLI				State				Office Type						
BST USE ONLY			CLEC USE ONLY											
	SRC	LCC Used	LTG	Option	NPA	Line Class	ODP (Y/N)	Flat/ Meas	MLH Hunt (Y/N)	0- Brand 1/2/3/4	DA Brand 1/2/3/4	0+ Local Brand 1/2/3/4	611 (Repair) (Y/N)	Branding Default (BST/Customized)
1														
2														
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
13														
14														
15														
16														
17														
18														
19														
20														

Note 1. Service Levels 1-BST Brand 2- No Brand 3- Custom Brand 4- Self Brand
 Note 2. SCR code is 5 digit code assigned by LCCAM LCC Used is 3 digit LCC Input by CTG The LCC is the last 3 digits of the SRC.
 Note 3. ODP plans are not available with flat rate service.
 Note 4. 611 is only available in Georgia, Florida, North Carolina, and South Carolina.

Comments/

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Selective Routing End Office Detail Information

	Office CLLI	NPA RAC	TS Code 0-	BST Use TGN	TS Code 0+ Local	BST Use TGN	TS Code DIR ASST	BST Use TGN	TS Code 611	BST Use TGN
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										

Notes/Comments

BELLSOUTH

Customized Calling Restrictions (CREX)

Table 1
Non-Centrex Like Services

OPTIONS	BLOCKS
UNR	No Blocking (Unrestricted)
1	1+, 0+, 0-, 00, 01+, 011+, 411, 1411, Pulselink, 976, 900, N11
2	0-, 0+, 00, 01+, 976, Pulselink
3	1+, 0-, 0+, 00, 01+, 011+, 900
4	900, 976
5	976
6	900, 976, N11
7	011, 1010XXX+011
A	Same as CREX 1, but also blocks mandatory ext calling plans
B	Same as CREX 2, but also blocks mandatory ext calling plans
W	0-, 0+, 00, 01+, 011+, 976
X	900, 976, 011+
Y	900, 976, N11, 011+
Z	976, 011+
SRG	1+, 1010XXX 1+, 900, 976 (Sends ANI 07)
SRGBX	1+, 1010XXX 1+, 900, 976 (Sends ANI 07) OCP (NC) PBX
SRGCO	1+, 1010XXX 1+, 900, 976 (Sends ANI 07) OCP (NC Only)

Notes:

- Options 1 through SRGCO cannot be combined
- If 0- or 0+ is custom routed, then option 1, 2, 3, A, B, or W cannot be selected.
- If Dir ASST is Custom Routed then option 1 or A cannot be selected
- SRG requires ANI 07 in 1AESS switches.

Table 2
Centrex Like Services

OPTIONS	Blocks
UNR	No Blocking (Unrestricted)
Deny Orig.	Blocks Originating Calls
Deny Term.	Blocks Terminating Calls
1	900, 976
2	011+
3	N11
4	411
5	Toll 1+, 011+, 900, 976
6	ELCA and Toll 1+, 011, 900, 976
SRGPL/SRG	1+, 1010XXX 1+, 900, 976
Station Rest 1	1AESS Only- Fully Restricted Incoming and Outgoing
Station Rest 2	1AESS Only- Fully Restricted Incoming
Station Rest 3	1AESS Only- Fully Restricted Outgoing
Station Rest 4	1AESS Only- Semi Restricted Incoming and Outgoing
Station Rest 5	1AESS Only- Semi Restricted Incoming
Station Rest 6	1AESS Only- Semi Restricted Outgoing

Notes:

- Deny Originating cannot have option 1 through SRG/SRGPL.
- Option 5 cannot be combined with Option 1, 2, 6, or SRG/SRGPL.
- Option 6 cannot be combined with Option 1, 2, 5, or SRG/SRGPL.
- 1AESS Station Restriction 1,3,4,or 6 cannot have Option 1 thru SRG/SRGPL.
- If Dir Asst is Custom Routed, Then Option 4 cannot be selected.
- SRG/SRGPL cannot be combined with Option 1 through 6.

LINE CLASS

LINE CLASS	DESCRIPTION
POTS	Plain Old Telephone Service
COIN	Coin Lines
HOTL	Hotel/Motel
PBX	Private Branch Exchange
ISDN	Integrated Services Directory Number
WATS	Wide Access Telephone Service
PSTG	Prestige
CENTREX	Centrex Like Service

Note: Only one Line Class can be selected per CLEC LCC.