

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

REBUTTAL TESTIMONY OF

BERNADETTE SEIGLER

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

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Q. PLEASE STATE YOUR NAME, ADDRESS AND EMPLOYMENT.

A. My name is Bernadette Seigler. My business address is 1200 Peachtree Street, Atlanta, Georgia. Currently I am employed by AT&T Corp. (AT&T) as District Manager, AT&T Local Services Access Management for Local Interconnection in AT&T's Southern Region. I am responsible for ensuring, at the most basic level, that AT&T is able to successfully send and complete orders sent to BellSouth Telecommunications, Inc. (BellSouth) for the provision of local exchange service.

Q. PLEASE DESCRIBE YOUR BACKGROUND AND PROFESSIONAL EXPERIENCE AS THEY RELATE TO ISSUES IN THIS PROCEEDING.

A. I received a Bachelor of Arts Degree in Psychology from Rutgers University, New Brunswick, New Jersey in 1984. Additionally I have attended many business-related courses offered by AT&T and BellSouth. Following my graduation from college, I was employed for 6 years in the medical products industry, and I have been employed for the last 10 years in the telecommunications industry.

I joined AT&T in 1990 as an Account Executive selling services to business customers in northern New Jersey. From 1992 until 1995, I held increasingly responsible positions in various AT&T sales, marketing and customer support units. In 1995, I joined the AT&T Local Cross Strata organization as a Product & Offer Manager. I was on the team responsible for the planning and implementation of AT&T's strategy for entering the Local Services market throughout the United States. In late 1996, I relocated to Atlanta, Georgia to join AT&T's Regional Local Product Management & Delivery organization. From 1996 until early 2001, I held various positions that have afforded me the opportunity to gain expertise in the following areas: (1) local and directory listings ordering and associated methods and procedures with BellSouth; and (2) AT&T's ordering systems and interconnection with BellSouth. I also participated in many negotiation sessions with BellSouth in support of the above activities as AT&T's Subject Matter Expert to ensure our local business market needs were addressed. My last assignment was to lead AT&T's Business Market Entry into Georgia and Florida using UNE P/Switched Combinations of Unbundled Network Elements.¹ In April 2001, I was promoted to District Manager, AT&T Local Services Access Management for Local Interconnection in the Southern Region, which includes Florida.

¹ As used in this affidavit "UNE" refers to unbundled network elements ordered by AT&T from BellSouth; and "UNE-P" refers to the unbundled network element platform, which is the combination of unbundled loop and port.

Q. HAVE YOU TESTIFIED IN OTHER REGULATORY PROCEEDINGS IN THE PAST?

A. I have not submitted written or oral testimony in any other regulatory proceedings. I have submitted affidavits in regulatory proceedings in the states of Georgia, Alabama, Louisiana, Mississippi, Kentucky and South Carolina.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. I am testifying on behalf of AT&T, TCG, and AT&T Broadband regarding BellSouth's failure to provide nondiscriminatory access to network elements, Issue 3 in this proceeding. BellSouth's failure has significantly impeded AT&T's ability to enter the local exchange market for business customers. My testimony specifically replies to and rebuts the testimony of BellSouth witness W. Keith Milner before this Commission. In his testimony, Mr. Milner states that he is addressing the Commission's Issue 3 by describing BellSouth's purported compliance with Checklist Item 2 (Milner Affidavit at 34 *et seq.*), testifying that BellSouth provides alternative local exchange carriers (ALECs) with nondiscriminatory access to network elements. My testimony will explain that although BellSouth asserts that it provides "access" to a large number of network elements, that access on too many occasions has been inconsistent, difficult and costly to AT&T and its customers, and therefore has not been the type of nondiscriminatory access contemplated by Sections 251 and 271 of the Telecommunications Act of 1996 (the Act).

Q. WHAT SPECIFIC ISSUES WILL YOUR TESTIMONY ADDRESS?

A. In my testimony I will describe several of the more significant difficulties that AT&T has encountered in its efforts to use BellSouth's UNE-P to provide small business customers with AT&T's All in Onesm service. AT&T's All in Onesm service enables AT&T to combine local, intraLATA, long distance, calling card, toll free and World Net services into a billing plan that includes a simple pricing structure and a discounted monthly rate. The difficulties that AT&T has encountered have been due to the failure of BellSouth to meet its obligations under Sections 251 and 271 of the Act to provide just, reasonable and non-discriminatory access to unbundled network elements.²

AT&T's use of UNE-P is a continuation of its attempts to enter the local exchange business market that began with the passage of the Act in 1996. AT&T first attempted to enter the local exchange business market in 1996 and 1997 through the ordering of BellSouth's total services resale (TSR) product in Georgia. After months of testing, AT&T determined that it would not be in the best interest of its local exchange business customers nor in the best business interests of AT&T to enter the business users' local market by means of BellSouth's TSR offering. Our tests proved that BellSouth's TSR would be below AT&T's standards for quality, service and reliability. In addition, the costs to AT&T for TSR were significant and far too great for AT&T to be able to offer the service profitably. AT&T determined that its customers' needs would best be served

² In the course of reviewing prior Section 271 applications, both the Federal Communications Commission (FCC) and the Department of Justice have stressed that "it is critical that competitive LECs have the ability to enter the local exchange market through the use of combinations of UNEs." *Application of BellSouth, et al. for In-Region, InterLATA Relief Pursuant to Section 271 for Louisiana*, CC Docket 98-121, ¶ 141 (1998) (citing Department of Justice Evaluation, at 36). As with any checklist item, an ILEC has the burden of demonstrating that combinations of UNEs are available "as a *practical and legal* matter." *Id.* ¶ 163 (emphasis added).

by finding a method other than TSR by which to provide local services to small and large business customers. Throughout 1997 and 1998, AT&T proceeded to roll out AT&T Digital Link (ADL) service, which enabled large business customers (those with T1.5 access) to add local calling capabilities to their AT&T service. AT&T first offered ADL in Georgia, then rolled the product out in Florida, Tennessee and North Carolina. Eventually ADL was also rolled out in South Carolina, Louisiana, Kentucky, Alabama and Mississippi. Further, AT&T has attempted to provide local exchange service to small business customers through purchasing the use of loops from BellSouth, UNE-L.

I will discuss in this testimony several of the serious challenges faced by AT&T in reaching the business market using UNE-P as a result of BellSouth's failure to provide the required access to network elements. These challenges are: (1) the loss of service suffered by newly-migrated AT&T customers caused by faulty BellSouth procedures; (2) BellSouth's failure to adopt and follow consistent and logical business rules for ordering UNEs, resulting in an unacceptably high number of rejections in error; (3) BellSouth's unduly lengthy and burdensome process for assigning billing account numbers; and (4) the chronic instability of both BellSouth's LENS system and the back-end systems connected to LENS.

As a result of BellSouth's failure to meet its obligations under the Act, business customers have been deprived of the benefits of full and open competition, and in some cases those who elected to switch from BellSouth to AT&T have suffered service delays and even loss of service. These challenges have both delayed and made more difficult AT&T's effective entry into the business user market using UNE-P. Further, they have

caused disruption and inconvenience to business customers who chose to use AT&T as their local carrier.

THE IMPORTANCE OF THE BUSINESS-USER MARKET SEGMENT

Q. WHAT IS THE IMPORTANCE OF THE BUSINESS USER MARKET TO AT&T?

A. In addition to AT&T's desire to serve residential customers, small business consumers also comprise a very important market segment for AT&T. Because many small business users typically order multiple lines and maintain high volumes of activity on these lines, the revenues from this market segment are substantial. Indeed, because businesses account for such significant source of revenue for any local exchange carrier, including BellSouth, ALECs such as AT&T would find it very difficult to succeed without a significant presence in the business market. In addition, an ALEC that does not establish itself as a substantial and reliable supplier of business-oriented telephone services in addition to serving residential customers would have a difficult time gaining the credibility and critical mass necessary to compete successfully in the market over the long term. For this reason, the challenges to entry caused by BellSouth's actions and shortcomings take on added importance.

**BELLSOUTH'S FAULTY PROCEDURES HAVE CAUSED NEWLY-MIGRATED
AT&T UNE-P CUSTOMERS TO LOSE SERVICE**

Q. PLEASE DESCRIBE THE LOSS OF SERVICE INCIDENTS SUFFERED BY NEWLY MIGRATED AT&T UNE-P CUSTOMERS.

A. AT&T and other ALECs have experienced an unacceptable number of loss of service incidents upon conversion of business customers from BellSouth's service to UNE-P service. These incidents display a pattern that has become much too familiar: an AT&T business customer calls AT&T on the day of its conversion to UNE-P services or shortly thereafter – and, in at least one case, on the day before conversion was scheduled – to complain that he or she has lost dial tone on his or her business lines. AT&T representatives must then contact BellSouth's representatives in an effort to have service restored. Inevitably, as described more fully below, AT&T representatives have a difficult time finding the right person within BellSouth to take responsibility for curing the problem. Eventually, BellSouth does restore the customer's service, but in many cases not until hours or even days after the problem had been reported. And, because BellSouth's role is hidden from the customer, AT&T incurs the customer's wrath for the loss of service.

AT&T has experienced these loss of service problems in both Florida and Georgia, the two states in the BellSouth region where AT&T is using UNE-P to provide service to its business customers. AT&T's experiences to date demonstrate the shortcomings in BellSouth's processes and procedures that are significant in considering whether

BellSouth is meeting its obligations with respect to providing network elements comprising UNE-P services in a nondiscriminatory manner.

Q. WHAT IS THE PRINCIPAL CAUSE OF THE LOSS OF DIAL TONE PROBLEM?

A. AT&T's analysis of trouble tickets relating to UNE-P orders shows that many customers are losing dial tone when BellSouth converts a customer from its service to AT&T UNE-P service. In particular, AT&T's records indicate that during the month of May 2001 (the most recent period for which AT&T has confirmed statistics), 19 AT&T customers in Georgia and 7 AT&T customers in Florida experienced loss of dial tone when converting to AT&T UNE-P from BellSouth service. To convert customers to UNE-P, BellSouth uses two separate internal orders: a new or "N" order that accomplishes the UNE-P conversion; and a disconnect or "D" order, by which the customer's BellSouth service is disconnected. If BellSouth does not process the orders in the proper sequence, the customer's service is disconnected pursuant to the "D" order before the conversion is completed pursuant to the "N" order. These two orders should be related so they are not worked independently and in the wrong sequence. However, BellSouth's procedures do not ensure that the orders are properly related and coordination failures have occurred far too frequently, resulting in a customer's loss of dial tone.

Another aspect of this problem is the fact that BellSouth does not have effective communications and process linkage between its provisioning center and its maintenance center. As a result, when AT&T receives calls from customers experiencing loss of dial

tone problems, the AT&T maintenance center attempts to refer this to the BellSouth maintenance center, since these are post-provisioning problems and the BellSouth maintenance center should handle such problems. However, because the “N” order effecting migration has not been worked, BellSouth maintenance center personnel do not see the migrated customer record when the order is called up on their computer screens; all they see is the worked “D” order, not the pending “N” order, and consequently they are refusing to take responsibility for the maintenance request, believing it to be a provisioning problem. This causes the AT&T personnel to make numerous telephone calls and escalate the problem through several BellSouth supervisory layers before having the matter resolved and dial tone restored.

Q. WHAT HAS BEEN BELLSOUTH’S RESPONSE TO THIS PROBLEM?

A. This issue was brought to BellSouth’s attention more than three months ago at the first BellSouth UNE-P Users’ Group Meeting for Georgia, held in Atlanta on March 22, 2001. A copy of the minutes of this meeting is attached to this testimony as Exhibit BMTS-1. The Users’ Group Meeting is a BellSouth-created forum that purportedly allows BellSouth to come together with ALECs to discuss UNE-P operational issues. At the Georgia meeting, following a discussion of what aspects of the UNE-P process were working and what were not, an issues list or “Action Plan” was created. Among the items on the list was the loss of dial tone problem caused by BellSouth’s lack of coordination between “D” and “N” orders. A copy of the Action Plan is attached to this testimony as Exhibit BMTS-2. (Items 1, 2 and 3 of Exhibit BMTS-2 are symptoms that all originate with the loss of dial tone at conversion to UNE-P.)

AT&T again presented information on this issue at the second Users' Group Meeting in Atlanta on May 23, 2001. A copy of the minutes of this meeting is attached to this testimony as Exhibit BMTS-3. Other ALECs who were experiencing the same problem also raised the issue. Indeed, Birch Telecom stated that they had already provided BellSouth documentation regarding forty of their customers that BellSouth had put out of service because "D" orders were worked before "N" orders. Nevertheless, BellSouth representatives at the meeting refused to take action – BellSouth insisted that it needed from each ALEC more examples of such problems before committing to any corrective action. I was in attendance at that meeting, and I asked the BellSouth representatives why they were not finding a resolution to the problem since they had received reports of forty incidents from Birch Telecom as well as reports from other ALECs. I went on to ask why we, the ALEC community, must continue to provide examples that demonstrate the same negative customer experience again and again. Other ALECs joined in saying that ALECs can continue to send examples of our customers losing dial tone, yet BellSouth will make no commitment to solve the problem.

In response to my comments, Lynette Nall, the BellSouth Local Carrier Services Center (LCSC) staff support representative at the meeting, finally acknowledged that BellSouth knew from the beginning that the use of "D" and "N" orders was not the preferred way to process UNE-P conversions, but that it was the best they could come up with at the time. She further said that BellSouth has had a team in place for some time to address the issue and to create a "single C-order" (change order) for UNE-P conversions and other services to prevent the loss of dial tone. At the meeting Ms. Nall said that BellSouth hopes to

have this project completed *by the end of the year 2001*, but would not make a firm commitment to that schedule. Jim Marziarz, BellSouth's UNE product manager, confirmed that BellSouth was addressing the problem as described by Ms. Nall. The ALEC community, including AT&T, advised BellSouth that the estimated delivery of this solution by end of year 2001 is not an acceptable timeframe because until they fix the problem, more ALEC customers will continue to lose dial tone when converting to UNE-P. Even more distressing, and in spite of the pleas of AT&T and other members of the ALEC community, BellSouth in preparing the formal minutes of the May 23 meeting (Exhibit BMTS-2) announced that the target implementation date for the "single C-order" would be pushed back even further to *early 2002*.

Q. PLEASE PROVIDE SOME EXAMPLES OF HOW THE LOSS OF DIAL TONE PROBLEM HAS IMPACTED AT&T CUSTOMERS.

A. By way of example, one AT&T UNE-P retail establishment customer lost dial tone on Saturday, May 5, 2001. Dial tone was not restored to this customer until Tuesday, May 8, 2001. See letter from Denise Berger to Ken Ainsworth, attached to this testimony as Exhibit BMTS-4, outlining these UNE-P disconnect problems, and specifically Attachment 2 to that letter. As that document shows, the AT&T representatives working this problem had to make numerous calls and were transferred from one BellSouth representative to another before finally having the matter resolved, nearly three full days later.

Q. DO YOU HAVE EXAMPLES OTHER THAN THOSE IDENTIFIED IN THE BERGER LETTER?

A. Yes. In addition to the situation relating to the AT&T retail customer described above, and the other incidents referred to in the Berger letter, AT&T has experienced still other examples of customers losing dial tone because of BellSouth's lack of coordination in the "D" and "N" order process that have occurred in Florida and Georgia over the past several months. I will describe some examples of the types of incidents experienced by AT&T UNE-P customers.

On May 31, 2001, the day before the conversion of an AT&T customer in Miami, Florida to UNE-P was scheduled, BellSouth worked its D order. On June 1, 2001 the customer called AT&T to say that it did not have dial tone on any of its 11 lines. It took BellSouth about 3 hours to get our customer back in service once the outage was reported to BellSouth. However, the AT&T customer was without dial tone for a total of approximately 13.5 hours. Another incident involved a customer in Ft. Lauderdale, Florida with only one telephone line who was out of service for 2 hours and 45 minutes on June 4, 2001, the day the customer's service was converted from BellSouth to AT&T UNE-P. This one line is the only way for his customers to reach him, and BellSouth's processing of the D order before the N order resulted in his not having access to his customers, which are his source of revenue, for the period of the outage. In another example, an auto service business customer in Miami, Florida called AT&T on the afternoon of June 26, 2001, the day he was converted from BellSouth to AT&T UNE-P, to report a loss of dial tone on his 2 lines. Service was not restored until the following

afternoon, over 24 hours later. BellSouth's explanation for this loss of service, again, was that the D order was worked before the N order.

Q. WHY DOES AT&T VIEW THESE LOSS OF DIAL TONE INCIDENTS AS ESPECIALLY TROUBLING?

A. The fact that numerous loss-of-dial-tone incidents have occurred over the past several months due to BellSouth's "D" and "N" order problem is especially troubling because, as AT&T's volume of UNE-P orders increases, the number of problems experienced likely will increase as well. This situation, if not corrected, will have a significant impact on AT&T's customers and on AT&T's own reputation. Compounding the problem is the customer's perception that the problem must be caused by AT&T, since there were no similar difficulties when local service was provided by BellSouth. Because of this perception, customers are many times inclined to switch back to BellSouth, even though BellSouth is the cause of the problem. Indeed, a related problem that worsens the situation, which was also identified in the UNE-P Users' Group Action Plan, is that BellSouth employees are attempting to win back ALEC customers after conversion, in some cases telling the customer that the loss of dial tone is the fault of the ALEC. See items 6 and 8 in the Action Plan, Exhibit BMTS-2.³

The unacceptable number of loss of dial tone incidents experienced by customers of AT&T and other ALECs upon conversion demonstrates that BellSouth is not able to provide access to network elements necessary to process AT&T's UNE-P orders in a

³ See also *In re: Complaint of IDS Long Distance, Inc., n/k/a IDS Telecom, L.L.C., Against BellSouth Telecommunications, Inc., and Request for Emergency Relief*, Docket No. 010740-TP, Filed May 11, 2001, before the Florida Public Service Commission.

consistently acceptable, nondiscriminatory manner. These loss of dial tone incidents are disruptive and distressing to customers, causing the customer inconvenience and loss of business, and in the case of customers such as the hospice, threatening the health and well being of those in a customer's care. And because BellSouth's role in the process is largely hidden from the customer, AT&T alone faces the customer's anger and disappointment. Because these process failures on the part of BellSouth put AT&T at a significant competitive disadvantage, BellSouth cannot claim to be meeting its obligations to provide nondiscriminatory access to network elements.

**AT&T HAS EXPERIENCED AN UNACCEPTABLY HIGH INCIDENCE OF
REJECTIONS IN ERROR BECAUSE OF BELL SOUTH'S INCOMPLETE AND
INCONSISTENT BUSINESS RULES.**

Q. PLEASE DESCRIBE THE PROBLEMS RELATING TO BELL SOUTH'S REJECTIONS IN ERROR OF AT&T'S ORDERS FOR BUSINESS UNE-P.

A. AT&T orders UNE-P for its business customers from BellSouth by means of BellSouth's Local Exchange Navigation System (LENS). In order to place and process orders through LENS, AT&T is required to abide by an extensive set of business rules established by BellSouth. Failure to follow the business rules when populating information on the LENS template will cause BellSouth to return the order to AT&T for a "clarification", which amounts to a rejection of the order. When the order is rejected, AT&T must either provide supplemental information, which permits the order to

continue to be processed in a manner that will allow it to meet its original completion date; or, in the case of “fatal” rejects, AT&T must start the process all over again.

AT&T often has found BellSouth’s business rules for ALECs to be incomplete or inconsistent. As a result, AT&T has experienced far too many rejections in error; that is, “clarifications” or order rejections sent back to AT&T by BellSouth even though AT&T had complied with the controlling business rules. Although these rejections in error can occur because of any one or more of several reasons, AT&T has experienced the most problems with two particular issues: BellSouth’s use of universal service order codes; and BellSouth’s change in ordering procedures with respect to “as specified” orders. These issues are discussed below.

UNIVERSAL SERVICE ORDER CODES

Q. PLEASE EXPLAIN HOW BELLSOUTH’S BUSINESS RULES REGARDING UNIVERSAL SERVICE ORDER CODES HAVE CONTRIBUTED TO THIS PROBLEM.

A. A major problem with BellSouth’s business rules concerns its use of universal service order codes (USOCs). A USOC is an alphanumeric code that indicates the type of service and features that are to be provisioned on a line. USOCs are generally standard within the industry. For example, the USOC “ESM” designates the call-forwarding feature. Among other things, USOCs are used to identify the appropriate billing rate on a particular service and feature combination.

BellSouth's business rules (including appendices to the business rules and other documents cross-referenced by the business rules) regarding the use of USOCs do not provide consistent or complete instructions that cover all service and feature combinations that are likely to arise. This results in inconsistencies in the ordering process and also triggers erroneous order rejections by BellSouth. Such rejections can cause a customer to lose service; or can result in BellSouth requiring AT&T to send new orders, which ultimately delays the new service and causes end-user customer dissatisfaction.

Specifically, BellSouth has provided confusing and inconsistent instructions on the USOCs that must be entered on a local service request (LSR) to convert a customer's line from BellSouth to AT&T using UNE-P. For example, BellSouth guidance documents referenced by the business rules do not specifically state which USOCs are to be used to populate the type of service (TOS) field on the LSR in order to accurately reflect that UNE-P is a measured service, that is, a service whose fees are based on usage rather than on a flat rate. Incorrect coding in this regard can result in billing errors.

Furthermore, AT&T's stand-alone agreement with BellSouth for ordering of UNE combinations, effective January 31, 2001, requires that two USOCs be used in converting a business line to UNE-P: One must be designated either UEPBL (a business line with no caller ID feature) or UEPBC (a business line with caller ID), and the second USOC must be UEPLX (a designation for unbundled loop voice-grade). However, the BellSouth account team serving the AT&T account confirmed to AT&T in writing that only one USOC (UEPBL or UEPBC) was required, and further cautioned AT&T not to

use UEPLX because it was not necessary and could cause BellSouth to reject the order in error. These inconsistent business rules disrupt and delay the ordering process, causing inconvenience to newly-migrating AT&T customers and undermining AT&T's image as a competent and efficient carrier.

The number of rejects in error experienced by AT&T and caused by BellSouth's improper application of the USOC business rules has been substantial. For example, AT&T conducted a review of a sample of 61 LSRs sent to BellSouth during the period May 1 through May 22, 2001 that were identified by BellSouth as needing clarification. Of these, AT&T identified 35 incidents of rejections in error, or 57.4% of the clarifications. Of these rejections, 19 or 31.14% of 61 total orders were attributable to BellSouth's assertion that the UEPLX USOC is required to be reflected on an order. Please note that BellSouth does not reject every order that AT&T sends for lack of the UEPLX designation. BellSouth has converted hundreds of lines to UNE-P for AT&T on orders which never have included UEPLX on the LSR.

Q. ARE INCIDENTS OF REJECTION IN ERROR STILL OCCURRING?

A. Rejections in error continue to be a problem. AT&T reviewed a sample of 13 clarifications issued by BellSouth on orders during the period June 22 to 29, 2001. Of these 13, 5 were rejected in error, or 38.5% of the rejections. In a continuation of a problem that has plagued the process for some time, in this sampling 4 of the 5 rejections-in-error were for what BellSouth alleged to be incorrect population of the Basic Class of Service (BCS) field on the LSR. BellSouth's business rules for local

ordering state that the BCS field was added to the LSR to facilitate electronic ordering of PBX resale services. In other words, the BCS field is only to be used when ordering PBX resale. Nevertheless, BellSouth rejected the 4 LSRs for failure to populate the BCS field even though it is not to be used for the kind of UNE-P orders that AT&T is submitting. BellSouth is therefore rejecting in error and applying rules that should never be referenced for UNE-P orders. Each of these rejections in error requires AT&T representatives to call BellSouth representatives, usually multiple times, to get BellSouth representatives to admit their error and have them work the order as is without the need for a supplemental order from AT&T. Supplemental orders not only are time-consuming, meaning that AT&T representatives cannot process as many new customer orders when they have to deal with the need to supplement existing orders; they are also costly to AT&T because each supplemental order incurs non-recurring charges paid to BellSouth. This is particularly troubling when the fault lies with BellSouth and not AT&T.

CHANGE IN ORDERING PROCEDURES

Q. PLEASE EXPLAIN HOW BELLSOUTH'S CHANGE IN ORDERING PROCEDURES FOR BUSINESS UNE-P IMPACTED AT&T.

A. A last minute change in ordering procedures also caused problems for AT&T. During the planning for rollout of its UNE-P business customer services, and all through the pre-rollout discussions with BellSouth, AT&T understood that it could migrate BellSouth business customers to AT&T UNE-P services by placing an "as is" order with BellSouth.

An “as is” order means that the customer would switch from BellSouth to AT&T without any change in the customer’s class of service or features.

Just two weeks before AT&T was to place its first UNE-P order with BellSouth, BellSouth advised AT&T that AT&T would not be permitted to use an “as is” order unless it were for a UNE-P to UNE-P migration. This means that AT&T can not use the simple “as is” order process to convert customers from BellSouth to AT&T UNE-P services; rather, BellSouth directed AT&T to use an “as specified” activity type on the order to convert a BellSouth account to AT&T UNE-P. An “as specified” order includes the specific identification of service and features to be provided the customer upon conversion.

Q. DID BELLSOUTH EXPLAIN THE CAUSE FOR THE LAST-MINUTE CHANGE IN PROCEDURES?

A. BellSouth’s last-minute change was explained by the BellSouth account team assigned to AT&T as a misunderstanding or misinterpretation of the BellSouth rules on the part of the BellSouth account team, and only products that had been identified as UNEs prior to the FCC’s UNE Remand Order can convert using an “as is” order code. Since AT&T UNE-P orders would be converting a customer from BellSouth retail lines to UNE-P, AT&T was told it had no choice but to send the activity type of “as specified”. This last minute change in interpretation by BellSouth added an inordinate number of steps to what should be a simple ordering process. An “as specified” order requires AT&T to populate more fields on the LSR than does an “as is” order, which increases the

opportunities for BellSouth to reject orders, frequently in error. If AT&T could use the “as is” format, which simply asks that the customer be converted with the same service and features the customer presently has, much less information would have to be entered on the LSR. This would be quicker, more efficient, and result in fewer entry mistakes by AT&T and processing mistakes by Bell South. Instead, AT&T has to review rejections, determine those that are rejected in error, and escalate the problem to a BellSouth supervisor for resolution. As a result, AT&T has to spend time escalating issues for resolution and dealing with order rejections that would not have been the case using “as is” orders. These unnecessary steps impede AT&T’s ability to deliver services to its customers in the most efficient and expeditious manner.

BELLSOUTH’S BILLING ACCOUNT NUMBER ASSIGNMENT PROCESS IS
UNDULY DIFFICULT AND BURDENSOME

Q. PLEASE EXPLAIN HOW BELLSOUTH’S PROCEDURES FOR ASSIGNING BILLING ACCOUNT NUMBERS HAS DISADVANTAGED AT&T.

A. Another challenge for AT&T has been dealing with BellSouth’s method of handling the assignment of billing account numbers (BANs). The assignment of a BAN is necessary to establish a BellSouth billing account, known as a “Q account”, for AT&T accounts. Until such an account is established, AT&T cannot order UNEs from BellSouth. As discussed below, BellSouth chose to follow unduly complex and protracted rules and procedures for the UNE-P BAN assignment process. BellSouth has persisted in blaming AT&T for failing to follow procedures and other shortcomings; however, AT&T

consistently has attempted to follow BellSouth's procedures as closely as possible despite their inconsistencies and lack of clarity. AT&T did have occasion to correct information provided to BellSouth during the BAN assignment process, but the corrections were not of such nature or magnitude that the process should have been slowed or disrupted. Furthermore, contrary to BellSouth's assertions, BellSouth should not require a long lead time to provide UNE-P services, inasmuch as providing UNE-P only requires BellSouth to undertake certain record keeping tasks that involve adding established rates and USOCs to existing software tables.

Q. HOW WOULD YOU DESCRIBE BELLSOUTH'S RESPONSE TO THIS PROBLEM?

A. Although AT&T finally completed the process, inconsistencies in BellSouth's requirements and a seeming "hide-the-ball" attitude that surfaced during the process cast doubt on BellSouth's willingness and ability to administer a consistently reasonable and rational UNE-P ordering and provisioning process going forward. An example of this occurred on June 12, 2001, in a meeting that I had with the BellSouth account team assigned to the AT&T account. At that meeting, in response to my request for forms or other guidance regarding applying for a BAN, I and the other AT&T representatives were informed by the account team that BellSouth had available on its website a guide for ALEC start-up activity, which included guidance on the information needed to be submitted in order to have a BAN assigned. After the months of discussion regarding our attempts to have BANS assigned for our UNE-P services, this is the first time that the BellSouth account team ever referred to this document. Furthermore, the account team's

pointing to that document on June 12, after months of our going through the process (as described below) was not particularly useful, because it appears that information on “Switched Port Loop Combinations”, which covers UNE-P, was not added to the document until the March 2001 version. Thus, any particular requirements specific to securing BANs for UNE-P would not even have been included in that document until after AT&T’s experience had concluded.

Furthermore, the problems that AT&T encountered in attempting to secure BANs for UNE-P stand in contrast to AT&T’s experience when requesting BellSouth to issue BANs for other types of services such as ADL.⁴ In those cases, AT&T did not experience the delays and difficulties created by BellSouth in the UNE-P context. It is at least curious that when AT&T began a large-scale entry into the local business user market using UNE-P, the BellSouth processes that had worked reasonably smoothly suddenly began to be problematic.

Q. PLEASE DESCRIBE THE EVENTS SURROUNDING AT&T’S EXPERIENCE WITH THE BELL SOUTH BAN ASSIGNMENT PROCESS.

A. AT&T’s experience with BellSouth’s UNE-P BAN assignment process began on October 18, 2000, when AT&T first requested BANs for ordering UNE-P in Georgia from

⁴ AT&T has served the business user market for several years using the “AT&T Digital Link” (ADL) service in combination with local loops from BellSouth. With ADL, AT&T uses its existing long distance facilities to provide local exchange service to certain business customers. Because the ADL architecture requires customers to have dedicated trunks to AT&T’s toll switches, ADL service is limited to business customers who have a PBX with dedicated nodal facilities (a T1.5 facility) connecting the PBX to an AT&T toll switch. At its simplest, ADL takes outbound local traffic that would otherwise be routed through local trunks to BellSouth and reroutes that traffic through the T1.5 facility to AT&T’s toll switch. AT&T then routes the local call to BellSouth for completion. In this manner, AT&T can offer an ADL customer the capability to place outbound local calls. AT&T also has served the business user market using its “Prime” family of local products, which provides local, intraLATA, toll free, long distance and other services using UNE-L facilities from BellSouth.

BellSouth. On November 1, BellSouth issued two BANs to AT&T. At that point, BellSouth did not advise AT&T of the need to execute a new or different contract in order to order UNE-P, the significance of which fact will become apparent below.

After BellSouth had issued the original two UNE-P BANs for Georgia, AT&T concluded that it needed to secure additional BANs from BellSouth, because the two BANs that had been issued would not support the kind of detailed billing information AT&T needed to bill its customers adequately. Therefore, AT&T requested, on January 8, 2001, that BellSouth assign two new BANs for Georgia UNE-P.

BellSouth issued the new Georgia BANs on January 18, 2001, but did not load the required information associated with the new BANs into the LENS system until January 23. Furthermore, AT&T was not able to send orders to BellSouth under the new BANs until BellSouth had correctly loaded into the system the rates, network elements and features that would be available under those BANs. And the rates, elements and features that were associated with the new BANs were attached as an exhibit to a new agreement that BellSouth required AT&T to sign. This new agreement was not presented by BellSouth to AT&T until January 31. In addition, this was the first time that BellSouth had made the execution of a new agreement a condition to the implementation of a BAN. Thus, 23 days had passed between AT&T's first request for the new BANs on January 8, and January 31, when the new agreement was presented to AT&T. Although AT&T executed the agreement immediately, it still took BellSouth at least four attempts to load all of the rates, elements and features correctly, and that was not accomplished until February 6, 2001. February 6 was the first day that AT&T was able to send Georgia

UNE-P orders to BellSouth via the LENS system. Thus, AT&T was unable to send any UNE-P orders between January 18, when the new BANs were assigned and February 6, when BellSouth finally was able to accept orders using those BANs.

Q. PLEASE DESCRIBE AT&T'S EXPERIENCE WITH THE ASSIGNMENT OF BANS FOR FLORIDA UNE-P.

A. AT&T had a similar experience when it sought the assignment of Florida UNE-P BANs. On March 7, 2001, AT&T requested that BellSouth assign three UNE-P BANs for use in Florida. On March 9, BellSouth advised AT&T that it would take from five to seven business days to issue the BANs. However, it was not until nineteen days later, on March 28, that BellSouth once again advised AT&T it would have to sign a new agreement, with new rates, elements and features, in order to have the Florida BANs assigned. AT&T promptly signed the agreement on March 29, at which time BellSouth advised AT&T that it would take "a couple of days" to complete the processing. AT&T finally received the new Florida BANs on Friday, April 6, and was not able to submit its first order under the new Florida BANs until April 9 – eleven days after the agreement was signed.

Q. WHAT IS THE IMPACT ON AT&T OF THE PROBLEMS SURROUNDING THE ASSIGNMENT OF BANS?

A. The significance of AT&T's experience with BellSouth over the assignment of the Georgia and Florida UNE-P BANs is that BellSouth continues to make compliance with its business rules and other requirements a moving target. While AT&T's past

experience with the assignment of BANs for ordering ADL and other services from BellSouth had been relatively easy and straightforward, the process became complicated and difficult for UNE-P ordering, even to the point of requiring AT&T to enter into a new, separate agreement, a requirement that came suddenly and unexpectedly. As a result, AT&T was delayed by several weeks in its ability to offer UNE-P services to its customers. BellSouth's decision to make what had been a relatively simple process much more complicated does not suggest that it intends to be reasonable and accommodating in providing access to network elements going forward, but rather will continue to find ways to keep the playing field tilted in its favor.

**BELLSOUTH'S LENS IS UNSTABLE, ADVERSELY IMPACTING AT&T'S ABILITY
TO SERVE ITS UNE-P CUSTOMERS**

Q. PLEASE DESCRIBE AT&T'S EXPERIENCE WITH INSTABILITY IN BELLSOUTH'S LENS.

A. As noted above, AT&T places UNE-P orders with BellSouth through BellSouth's LENS. BellSouth's own tracking information shows that the LENS system and the back office processing systems that are associated with LENS have proved to be very unstable.

BellSouth makes available on its web site a report on LENS system outages as well as outages on BellSouth's two other ordering systems, EDI and TAG. We have prepared a summary of the outages over the past year reported by BellSouth on its website, a copy of which is attached to this affidavit as Exhibit BMTS-5. As that summary indicates, during the period August 1, 2000 through July 16, 2001, the LENS system has

experienced 153 separate outages, lasting from 10 minutes to as much as 5 days. The other ordering systems also experienced a significant number of outages, as reflected in Exhibit BMTS-5. As a result of these outages, AT&T has frequently experienced loss of some or all of the LENS functionality.

Q. WHAT IS THE IMPACT ON AT&T OF LENS INSTABILITY?

A. The serious instability of LENS, because it is the principal ordering interface between AT&T and BellSouth for UNE-P, significantly impacts the ability of AT&T access network elements and thereby offer prompt, efficient and accurate UNE-P services to customers choosing to convert from BellSouth to AT&T. A fully functioning LENS is critical to AT&T's ability to establish favorable initial impressions with converting customers, inasmuch as LENS is the initial ordering and provisioning facility for UNE-P services. LENS outages mean that AT&T cannot provide the quick and accurate response to customers placing conversion orders that such customers have come to expect, and AT&T's reputation and image suffer as a consequence. And once again, because customers have not experienced these sorts of problems when service was provided by BellSouth, AT&T stands to lose the customer.

SUMMARY AND CONCLUSION

Q. DO YOU HAVE ANY CONCLUDING REMARKS TO SUMMARIZE YOUR TESTIMONY?

A. Yes. The BellSouth shortcomings discussed in this testimony evidence serious weaknesses that have caused BellSouth to fail to afford AT&T and other ALECs nondiscriminatory access to network elements. BellSouth's policies, procedures and business rules are not designed nor are they sufficiently developed to handle the orders for UNE-P services that AT&T needs to attract and retain business consumers. These inadequate rules and procedures have delayed AT&T's access to network elements necessary for UNE-P, have made the process more cumbersome and prone to error that it should be, and has created instability in the system. This has harmed business consumers by causing unwarranted delays in service delivery, undermining their confidence in the reliability of their telephone systems, and in some cases actually causing interruption in service. Furthermore, not only do customers suffer as a result of BellSouth's failures, but because BellSouth's role in the process is hidden from customers, AT&T suffers the competitive consequences. Given these shortcomings, BellSouth cannot claim to be meeting its obligations under the Act to provide just, reasonable and non-discriminatory access to unbundled network elements.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

**UNE-P USER GROUP MEETING MINUTES
MARCH 22, 2001**

Margaret Garvin facilitated the UNE-P User Group Workshop held in BellSouth Center's Vail Auditorium in Atlanta, GA. The purpose of the meeting was to allow BellSouth to work closer with CLECs to discuss and resolve UNE-P operational issues. The goal is to create open forums in which the user group can address the many issues involved in the provisioning of UNE-P in a direct, collaborative environment in lieu of the more formal regulatory forums. She welcomed the attendees (workshop attendee list included). The Rules of Engagement were reviewed and approved (with minor changes) by the user group attendees.

The following questions and answers were discussed regarding the Rules of Engagement:

- How will voting be handled? One vote per CLEC. If CLEC has vendor representative, he/she will have one vote for that CLEC.
- Can CLEC legal department representatives attend? Members of CLEC regulatory departments can be included. However, attorneys are not invited to participate.
- How will change control issues be handled? Change control issues should be forwarded to change control process team by individual CLEC with consensus of user group.
- Will there be a fixed date for UNE-P user group meetings? To be determined. Bi-monthly and quarterly meetings were suggested. Possibly scheduled in conjunction with change control and change control review board meetings.
- Will there be a common user mailbox for CLEC e-mail? Until one is available, send issues to margaret.garvin@bridge.bellsouth.com (770-936-3750)
- Can notification be e-mailed letting user group know when website has been updated? Yes
- Will there be time during 8:30-12:30 format to bring up new issues? Yes

Jim Maziarz-BellSouth Product Manager gave UNE-P overview "Unbundled Port/Loop Switched Combinations". He will be developing snapshot of rate elements for "top ten" call flows. Call flows can be viewed on BellSouth's website www.interconnection.bellsouth.com/products/html/unes.html Product Information: 2-Wire Voice Grade UNE Loop/Port Combination (Business, Residential and Line Side PBX) go to page 19 for FLOWSPPT.ZIP.

The following questions (not included in Action Plan) and answers were discussed following the presentation:

- Are top MSAs in Zone 1 different than de-averaging as defined in NECA?
- ADUF file support needed in training materials provided to CLECs.
- What UNE-P service is equivalent to Megalink? BSI channelized trunk service. BRI and above go through complex group.
- Can ISDN BRI combinations be processed? Yes, orders have been submitted by various CLECs electronically in TAG and they are working.
- Will de-averaged loops be addressed in user group? Yes
- DS3 loop combination planned? No
- Are DDITs all outbound services? Yes, trunk side only, no class of service.

Tom Roberts-BellSouth Trainer spoke about UNE-P training opportunities and provisioning services.

- Switch port loop combo course is available (2-days) which will review billing and LENS. It can be suitcased to CLEC sites.
- Templates are being developed for specific REQ types for LSOC version 4 including highlighted fields and drop down menus. To be used for manual ordering. May reduce number of clarifications.
- Order writing services are available for a fee.

Rebate offers are available for courses. Professional Training may be contacted at 888-404-9899.

Pat Rand-BellSouth-UNE Support Manager gave presentation, "319-Switched Combos Opportunities with Resolution". She reviewed the Opportunity Types, electronic, manual, billing and miscellaneous.

The following questions (not included in Action Plan) and answers were discussed following the presentation:

- Are CLECs being billed for individual truck rolls?
- Can coin orders be processed in LENS? Yes, as of March 20.
- Talk.com has inaccurate loss notification report. Will provide examples to Jim Maziarz.

The afternoon was dedicated to giving CLECs the opportunity to present UNE-P issues. Thirty-two issues were boarded for inclusion in Action Plan. Feedback from BellSouth will be available in updated Action Plan on the website April 5. CLECs were asked to provide issues that they have identified to the facilitator two weeks prior to the next UNE-P user group meeting.

In closing, Margaret Garvin asked CLECs for comments about the value of the UNE-P User Group Workshop. Additionally, a feedback survey form was provided for attendees' comments.

The following comments were voiced:

- There needs to be representation from LCSC operations.
- Face-to-face meetings are preferable. Bi-weekly or quarterly. Try to schedule around change control meetings. Conference call availability is needed but being on conference bridge it is difficult to maintain.
- Retain BellSouth SME participation.
- UNE-P user group workshop was valuable, useful and appreciated.

The following Items will be posted on website and updated as needed:

- Meeting announcements
- Meeting minutes
- Action plan
- User group member directory
- Rules of engagement

UNE-P USER GROUP ATTENDEES
March 22, 2001

ACCESS Integrated Networks	Walter	Carnes
Access Point Inc.	Jared	Welch
AT&T	Ray	Sinclair
AT&T Business Local Service	Bernadette	Seigler
Birch Telecom	Lacie	Hamlin
Choctaw Communications Inc.	Amy L.	Lasseigne
Computer Intelligence Inc. (CI ²)	Thomas	Allen
Computer Intelligence Inc. (CI ²)	Athon	Clemons
Computer Intelligence Inc. (CI ²)	Darwin	Johnson
Computer Intelligence Inc. (CI ²)	Ruth	Wilson
IDS Telecom	Becky	Wellman
Interconnection Services	Scott A.	Kassman
ITC^DeltaCom	Debbie	Campbell
ITC^DeltaCom	Mary	Conquest
ITC^DeltaCom	Jana	Hudson
ITC^DeltaCom	Amy	Mann
ITC^DeltaCom	Kim	Sharp
KMC Telecom	Pauline	Frye
KMC Telecom	Tina	General
KMC Telecom	Marva Brown	Johnson
KMC Telecom	Dave	Sered
Lightyear Communications	Chris	Pointer
MCI	Caren	Schaffner
NewSouth Communications	John	Fury
NOW Communications	Joe	Clark
NOW Communications	Steve	Sulak
Stratos Telecom	Sheryl	Scobel
Talk.com	Susan	Chapman
Talk.com	James	Childress
Talk.com	Sharon	Eleazer
Talk.com	Debbie	Manoochchri
Talk.com	Page	Miller
Var-Tec Telecom	Terry	Gray
Var-Tec Telecom	Steve	Peters
Var-Tec Telecom	Ken	Schneer
Velocity Network of Kentucky	Ross	Costanzo
Velocity Network of Kentucky	David	Edwards
Velocity Network of Kentucky	Alan	Franklin.
WorldCom	Amanda	Hill
Z-Tel	Kristi	McNish
Z-Tel	Tami	Swenson

UNE-P USER GROUP ATTENDEES
March 22, 2001

BELLSOUTH PARTICIPANTS

Allison Brown
Amanda Butler
Scott Carpenter
Georgia Christenas
Constance Coley
Sandra Davis
Jewel Fortner
Bill French
Margaret Garvin
Patti Klein
Margaret Largent
Suzie Lavett
Richard Lee
Jim Maziarz
Herdy Merina
Tim Miller
Lynette Nall
Pat Rand
Tom Roberts
Ellen Shepard
Laura Walls
Suzanne White

UNE-P USER GROUP WORKSHOP ACTION PLAN

Revised As Of May 30,2001

ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
1 3/22/01 Also see 2 & 3	IDS Telecom Becky Wellman NewSouth John Fury BellSouth Sandra Davis	Errors prevent N-orders from flowing with D-orders. D-order processed first (separately). LFACS PF's orders since facilities are not reused creating service outage.	06/06/2001	Customer provided real-time example.
2 3/22/01 Also see 1 & 3	Birch Telecom Lacie Hamlin NewSouth John Fury BellSouth Sandra Davis	Loss of dial tone on day of conversion. Only one or two lines going down (sometimes entire account).	06/06/2001	Customer must contact LCSC immediately upon next recurrence. Needs to be observed while it is happening.
3 3/22/01 Also see 1 & 2	Birch Telecom Lacie Hamlin BellSouth Sandra Davis	Order stays in AO status during conversion	06/06/2001	Customer must contact LCSC immediately upon next recurrence. Needs to be observed while it is happening.
4 3/22/01	Talk.com Page Miller BellSouth Constance Coley	New orders with FOC dates do not download to WMC.	06/06/2001	Customer will send new examples to CSM.

UNE-P USER GROUP WORKSHOP ACTION PLAN

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
5 3/22/01	ITC^DeltaCom Mary Conquest NewSouth John Fury BellSouth Jim Maziarz	When ADSL is added to resale account CLEC cannot convert to UNE-P. CLEC did not add ADSL.	Closed	In a UNE-P arrangement, the CLEC is the network provider and BellSouth is no longer able to provide its ADSL service on that line. With Resale, BellSouth is the network provider and may provide its tariffed ADSL service on the end user's line.
6 3/22/01 Also see 30	ITC^DeltaCom Mary Conquest Birch Telecom Lacie Hamlin NewSouth John Fury BellSouth Jim Maziarz	BST retail employees have been telling end-users that CLEC has generated conversion which created outage.	06/06/2001	BellSouth is investigating.
7 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Sandra Davis	Cancelled orders (mostly call forwarding) created clarifications for "Reason Cancelled"	06/06/2001	BellSouth needs examples at the time clarification sent
8 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Jim Maziarz	What are BellSouth's responsibilities to CLECs with regard to Win Back? How much of BellSouth's process (time frames, reporting and contacts) can be made available?	Closed	Outside of the scope of the User Group.

UNE-P USER GROUP WORKSHOP ACTION PLAN

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
9 3/22/01	Talk.com Page Miller BellSouth Sandra Davis	CSOTS system does not reflect adjusted due dates after LCSC makes changes.	Closed	
10 3/22/01	Talk.com Page Miller NewSouth John Fury BellSouth Kevin Davis	Getting FOCs but not Completes (customer "on/not on")	Closed	For manual orders, the LCSC does not return a Completion Notice (CN) electronically to LENS. If the order was originally generated via LENS, then the CLEC will receive an FOC and an CN. If the CLEC did not receiving CN electronically for orders that they submitted electronically, then they will need to send that specific order number to their account rep for testing.
11 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Tiffany Ray	EDI issues not posted on website.	06/06/2001	Referred to change control. Issue is being addressed by BellSouth Electronic Communications Support Group. ECD will be provided.
12 3/22/01	Birch Telecom Lacie Hamlin BellSouth Jim Maziarz	Are there specific area calling plan USOCs in GA, FL and NC? Carrier notification letter only addresses other six states.	Closed	There are no calling plan USOCs for GA and NC. However, there is one calling plan USOC (UEPAF) for residential conversions in FL. Consult information guide for description of USOC under BellSouth retail calling plans.

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FPSC Docket No. 960786-TL
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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
13 3/22/01	IDS Telecom Becky Wellman NewSouth John Fury BellSouth Sandra Davis	Need flag (indicator) to show when customer has local service freeze.	06/06/2001	Customer provided examples.
14 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Laura Walls	Can the type of call records be included on call flows?	06/06/2001	BBI has formed a working group that will establish and develop documentation process for this information. ECD will be provided.
15 3/22/01	AT&T Ray Sinclair BellSouth Jim Maziarz	Need UNE-P zones (market-based rate) posted on website.	06/15/2001	This information will be posted to the website and is scheduled to be added by June 15, 2001.
16 3/22/01	WorldCom Amanda Hill BellSouth Kevin Davis	Where does CLEC get aspecial access number for remote access call forwarding on electronic orders? Only provided on manual orders.	Closed	Has been referred to Account Team.
17 3/22/01	WorldCom Amanda Hill BellSouth Charlotte Lange Lynette Nall	How to obtain address validation? Can LCSC assist?	06/06/2001	BBR being updated. Release date will be provided.
18 3/22/01	Birch Telecom Lacie Hamlin BellSouth	What is the difference between user transfer calling (ELY2N) and 3-way calling for transfer (ESCWT)?	Closed	ELY2N is Prestige USOC

UNE-P USER GROUP WORKSHOP ACTION PLAN

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
19 3/22/01	WorldCom Amanda Hill BellSouth	Do medical expedites require documentation from doctor?	Closed	No. IM approval is required. Would be normal expedite request for LCSC.
20 3/22/01	Talk.com Page Miller BellSouth Jim Maziarz	When BellSouth 800 number is dialed, will BellSouth report activity to pay phone clearinghouse?	06/06/2001	

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
21 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Patti Klein	Does Tennessee have market rates for UNE-P pricing?	Closed	The rates for combinations which the Tennessee Regulatory Authority (TRA) has approved are cost based rates for currently combined UNEs, or switch-as-is combinations. BellSouth will combine loop and transport UNEs at cost-based prices as required in the FCC's UNE Remand Order in order to have the exemption from providing local circuit switching in Density Zone 1 of the Nashville MSA. BellSouth is offering non-currently combined UNEs to CLECs at market rates pursuant to negotiated professional services agreements. BellSouth is aware that the TRA has stated its intention to issue a written order in the Intermedia Arbitration case (at its Conference on February 6, 2001), requiring BellSouth to provide CLECs with combinations of network elements which BellSouth currently provides to itself anywhere in its network. This decision is in the context of a two-party arbitration. Unless BellSouth seeks and obtains a stay of the TRA's order, the terms and conditions included in the BellSouth-
22 3/23/01	ITC^DeltaCom Mary Conquest BellSouth Laurel MacKenzie	Will BellSouth include ADUF in UNE training classes?	Closed	BellSouth is developing UNE Billing class that will cover ADUF. The class is scheduled for September 20 - 21 in Birmingham.
23 3/22/01	KMC Telecom Tina General BellSouth Laurel MacKenzie	Will BellSouth offer "beginner" UNE ordering process information?	Closed	BellSouth has split UNE class into four classes: UNE Basic (beginner class) starting in February; DATA UNE in March; Switch Port/Loop in February; and Collocation in April

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
24 3/22/01	WorldCom Amanda Hill BellSouth Sandra Davis	What rules surround customer abandonment that result in disconnects?	Closed	When a CLEC's end user is disconnected as an abandoned station, various scenarios may result. If another end user is requesting service at the location and it is not a request for an additional line, the existing service should be disconnected to allow facilities to be reused. Since the current end user is not available to initiate the disconnect request, a disconnect reason of AS is used. If the LCSC receives a request from the CLEC in which the CLEC has advised it is an Abandon Station and if the working service is a BellSouth account, a disconnect order is issued and an "N" Order for the new service. There is no notification required. If the working service is for a different CLEC a "D" order is issued and an "N" order for the new service is issued. A MECHANIZED NOTIFICATION LETTER will be sent to the CLEC whose account is being disconnected. On a new install, the CLEC must indicate if there is existing working service at the end user location. They do this by populating the WSOP field on the End User form with either A (for an additional line) or V (for Abas. If they do not indicate anything in this field, and the LCSC determines that an interfering station condition exists, the order is clarified back to the CLEC.

UNE-P USER GROUP WORKSHOP ACTION PLAN
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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
25 3/22/01 Also see 32	All CLECs BellSouth Jim Maziarz	Can BellSouth develop phased process for collecting de-averaged revenues from CLECs?	Closed	The CLEC should contact its BellSouth Contract Negotiator on this matter.
26 3/22/01	Talk.com Page Miller BellSouth Jim Maziarz Tim Miller Sandra Davis	Being charged for unauthorized truck rolls. Technicians were dispatched and should not have been.	Closed	BellSouth has addressed issue by training service reps.
27 3/22/01	Talk.com Page Miller BellSouth Jim Maziarz	Loss notification reports may be inaccurate.	06/06/2001	A coding error with the Loss Notification Report was recently identified and has been corrected. Process being developed. ECD will be provided.
28 3/22/01	All CLECs BellSouth Jim Maziarz	When BellSouth end user moves to CLEC, does billing structure stay the same?	Closed	The end user billing structure is defined by the CLEC and it may bill its end user however it chooses.
29 3/22/01	All CLECs BellSouth Sandra Davis	What is scenario for E in hunting activity?	06/06/2001	The HA Field should be left blank on LSRs for conversion to UNE-P. Pending in change control. Carrier notification will be issued.
30 3/22/01 Also see 6	IDS Telecom Becky Wellman BellSouth Jim Maziarz	BellSouth told CLEC end user that conversion was new line because it was issued as N-order.	06/06/2001	If the conversion is a true conversion then conversion nonrecurring charges should only apply.

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
31 3/22/01	Talk.com Page Miller BellSouth Margaret Largent	Are CLECs billed by BellSouth when end user abandons service? CLEC was charged for termination when defective BRI equipment was replace to fix a trouble (dropped calls).	06/06/2001	If BellSouth does not know that the service has been abandoned, BellSouth will continue to bill the BTN or Account number of record until notified to disconnect or a new order comes in to BellSouth for service at the abandoned service address. BellSouth received clarifying questions and is investigating.
32 3/22/01 Also see 25	All CLECs BellSouth Jim Maziarz	Since it took twelve months for BellSouth to develop de-average zone billing, will CLECs have twelve months to pay? Need uniform billing scheme for CLEC community.	Closed	The CLEC should contact its BellSouth Contract Negotiator on this matter.
33 3/26/01	WorldCom Amanda Hill BellSouth Herdy Menina	If an order is sent via EDI, will it be clarified if the due date requested is not available or will BellSouth assign the next available due date?	Closed	If the Desired Due Date cannot be met on orders submitted via EDI then the system will assign the next available due date, as per the Appointment Interval. FOC will be sent with the Assigned Due Date. The orders will not be clarified.
34 3/26/01	Choctaw Communications Amy Lasseigne BellSouth Michael Moore	Need detailed explanation of initial UNE-P bills. They may have been overcharged for Non Recurring Charges	Closed	Customer has received explanation

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
35 5/9/01	Talk.com Page Miller BellSouth Sharon Judy	How often is CSOTS updated to reflect date changes?	Closed	SOTS updates daily. However, CLECs should access the Help Guide under their SOTS website https://clecview.bellsouth.com and reference section 1.2 - System Availability for scheduled maintenance/upgrades.
36 5/23/01	CI ² Ruth Wilson Talk.com James Childress BellSouth	Need Account Executive to represent customer throughout all BellSouth subsidiaries.	06/06/2001	
37 5/23/01	Momentum Business Peggy McKay BellSouth Jim Maziarz	Need discussion of the May 18 carrier notification letter regarding the LATA-wide calling plans and what is needed in the Interconnection Agreement?	Closed	Jim Maziarz reviewed this issue during his presentation.
38 5/23/01	Network Telephone Mitch Dantin IDS Telecom Becky Wellman BellSouth Lynette Nall	During conversion, does PIN change? Can PIN be designated by CLEC?	06/06/2001	
39 5/23/01	Birch Telecom Lacie Hamlin BellSouth Lynette Nall	Need some type of documentation with examples of orders that fall out for manual handling (other than those listed on website).	06/06/2001	

UNE-P USER GROUP WORKSHOP ACTION PLAN
 Revised As Of May 30,2001

ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
40 5/23/01	Birch Telecom Lacie Hamlin Talk.com Page Miller BellSouth Jim Maziarz	What are the charges for PIC changes?	06/06/2001	
41 5/23/01	ACCESS Integrated Louise Wilds Talk.com James Childress BellSouth Lynette Nail	LCSC and repair have trouble committing to ownership in a timely manner when there are problems turning up new service. If order has not been completed, who is the owner?	06/06/2001	
42 5/23/01	Birch Telecom Lacie Hamlin BellSouth Lynette Nail	How can pre-order survey be ordered for facilities?	06/06/2001	
43 5/23/01	Intermedia Sherrie Baughman BellSouth Jim Maziarz	Are the Switch CLLI codes the same within density Zone 1 for the MSA's for UNE-P the same as they are documented for EEL's?	06/06/2001	
44 5/23/01	Intermedia Sherrie Baughman BellSouth Jim Maziarz	Is the UNE-P non recurring conversion charge the same for all areas? For accounts in the density Zone 1, 2, and 3 MSA's, the charge is \$41.50.	06/06/2001	

UNE-P USER GROUP WORKSHOP ACTION PLAN
Revised As Of May 30,2001

ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
45 5/23/01	Network Telephone Joann Baxter BellSouth Susan Jones	Will the training center provide an EDI training class?	06/06/2001	

UNE-P USER GROUP MEETING MINUTES MAY 23, 2001

Margaret Garvin facilitated the UNE-P User Group Workshop held in BellSouth Center Room 414 in Atlanta, GA. This was the second meeting of the UNE-P user group. She welcomed the attendees (workshop attendee list included). Roll call was taken and the agenda was reviewed.

Susan Judy-LCSC Manager gave an overview of Local Carrier Service Centers (LCSC). LCSCs are located in Atlanta GA, Birmingham AL and Fleming Island FL (a/k/a Jacksonville). Atlanta and Birmingham are Production Centers and responsible for processing Resale, UNE and complex LSRs. Fleming Island is the Call Center and responsible for responding to Resale clarification and ordering issues. On occasion, calls made to Fleming Island may be forwarded to Atlanta or Birmingham. She reviewed the process flows for manual and electronic LSRs. She also gave an overview of who to call and when to call them. She suggested checking web reports before calling. The first point-of-contact for Atlanta Resale CLECs on simple, non-complex LSR clarification questions and service order questions is 800-872-3116. The first point-of-contact for Birmingham Resale CLECs on simple, non-complex LSR clarification questions is 800-773-4967. LCSCs should be called when there's difficulty communicating with BellSouth's FAX server and with LSR and service order issuance questions. The escalation process is posted on <http://interconnection.bellsouth.com> Click on Wholesale Markets-Contact Us-LCSC-Appropriate LCSC After Hours List. CLECs can help with timely and accurate processing of LSRs by:

- Performing pre-order functions
- Populating LSR fields in accordance with BellSouth Business Rules
- Reviewing Products/Services documentation
- Reviewing tariffs
- Checking Change Control website

Electronic interface problems should be referred to EC-SPOC 888-462-8030. The EDI support group can be contacted at 205-988-7613.

Additional CLEC concerns were discussed. Clarifications for pending orders in LENS can be identified by "PSO" at the top of CSR. For address validation, the CLEC's customer should contact their county 911 office for verification and then contact LCSC with the validated address. The problem with clarifications due to illegible faxes persists. CLECs should continue to report these problems to Account Team.

Bill Czolba-CTC Exchange voiced concern that the preferred method of communication with CRSG is e-mail but many BellSouth forms (proprietary) are in PDF format and cannot be updated and attached to e-mail.

Page Miller-Talk.com suggested that other CLECs review their cost bills and contracts. She discussed that manual additive charges vary according to state and that cost charges were being made with another CLEC's PONs.

Jim Maziarz- Product Manager gave UNE-P overview "Unbundled Port/Loop Switched Combinations". He discussed the vertical feature rate structure, UNE-P USOCs and dialing parity, LATA-wide local calling with UNE-P and DSL on UNE-P. The vertical feature rate structure, which has a target date of June 1, 2001, applies to stand-alone ports and port/loop combos or Res, Bus and PBX (UNE-P), Coin and BRI. The new rate structure is part of new standard agreements and includes featureless port, an "all available features charge (UEPVF) and features included with the UNE port charge in GA and TN. UNE USOCs listed in the Information Guide provide the same 7 and 10-digit and 1+ dialing arrangements as the BellSouth retail USOCs that they are converted from.

LATA-wide local calling with UNE-P will be available May 25, 2001. It requires CLEC to LPIC BellSouth Telecommunications (5124) in order for calls to be transported by BellSouth. Calls terminated between the Parties shall be treated as local calls. Specific terms and conditions need to be incorporated in the Parties' Interconnection Agreement, so an amendment is necessary. If BellSouth has been previously selected as the LPIC, UNE usage billing shall commence on May 25, 2001. CLEC will be billed for unbilled usage. Backbilling for June should be in July. DSL on UNE-P is currently not available. BellSouth is analyzing this business opportunity.

Additional issues were discussed which included the fact that inward/outward dialing plans cannot be converted to UNE since it is strictly for dialing out. Calls terminating in the same LATA are billed a local charge. The information covered in Jim's presentation will be included in website update.

Susan Jones-Training gave an overview of BellSouth Professional Training Services' curricula for Facility-based, Local Facilities and Port/Loop. Training information is on website <http://interconnection.bellsouth.com/training/index.html>. Classes can be customized and/or suitcased to the CLEC's location. Two free workshops that address provisioning and completion of orders have been held this year: February 26th covered the top ten most common errors and April 23rd covered directory listing and captions. Reservations need to be made ASAP for remaining seats for workshops to be held June 25th, August 20th, October 29th and December 17th. Each CLEC is limited to four students per workshop. Handouts for LSR Templates were included in the attendee package. Susan can be reached at sjones86@bellsouth.net or 205-655-7704.

The UNE-P Action Plan was reviewed. Action items 4, 13, 20 and 29 were updated. Action items 5, 8, 12, 16, 18, 19, 21, 22, 23, 24, 25, 26, 28, 30, 32, 33, 34 and 35 were closed. Action items 36 through 45 were added.

Action item 1 is still raising concern for AT&T, Birch Telecom and Network Telecom. The issue is that "Errors prevent N-orders from flowing with D-orders. D-order processed first (separately). LFACS PF's orders since facilities are not reused creating service outage." BellSouth will review real-time examples provided by CLECs. The CLECS would like to see one order issued instead of two orders (D and N). BellSouth is working on a "single C-order" which should resolve this problem. Initially, Lynette Nail-LCSC Staff Area Manager anticipated that this would be completed by year-end 2001. Upon further investigation, BellSouth recognizes that more time is required and a new target implementation date of early-2002 has been established.

CLECs want support from their Interconnection Account Team when dealing with all BellSouth subsidiaries. There is the perception that the wholesale arm does not have influence, as CLEC advocate, with the retail arm of the company despite being part of the same corporation.

It was reviewed that the scope of the UNE-P User Group does not include Change Control, Legal or Regulatory issues.

The UNE-P meeting minutes, and updated action plan and member directory will be posted on the website May 30, 2001. Responses from BellSouth will be available in updated Action Plan on the website June 6. CLECs were asked to provide issues that they have identified to the facilitator two weeks prior to the next UNE-P user group meeting no later than July 2, 2001.

The UNE-P user group meeting ran until almost 2pm ET. Future meetings may need to be scheduled to provide more time for reviewing the action plan. The next UNE-P user group meeting will be July 17, 2001 at the CLEC Inforum. The location is the Atlanta Hilton Hotel in downtown Atlanta, GA. See the BellSouth interconnection website for details on the CLEC Inforum.
http://interconnection.bellsouth.com/events/html/clec_inforum.html

UNE-P USER GROUP ATTENDEES
May 23, 2001

ACCESS Integrated Networks	Annette	Hardy
ACCESS Integrated Networks	Louise	Wilds
AT&T	Linda	Murphy
AT&T	Patricia	Powell
AT&T	Rochelle	Richardson
AT&T	Bernadette	Seigler
AT&T	Sally	Thacker-Fox
Birch Telecom	Lacie	Hamlin
Bluewater Communications	Tom	Farrington
Bluewater Communications	Daryl	Nathanson
BTI Telecom	Jose	Aguilar
BTI Telecom	Anthony	Dillard
BTI Telecom	Lavarus	Kornegay
BTI Telecom	Nina	Heath
Choctaw Communications Inc.	Amy L.	Lasseigne
Computer Intelligence Inc. (CI2)	Ruth	Wilson
CTC Exchange Services	Bill	Czolba
EPB Telecommunications	Andrea	Williams
IDS Telcom	Becky	Wellman
Intermedia Communications	Sherrie	Baughman
ITC^DELTACOM	Kim	Britnell
ITC^DELTACOM	Jana	Hudson
ITC^DELTACOM	Donna	King
Lightyear Communications	Phil	Candella
Lightyear Communications	Michael	DeKorte
MCIWorldcom	Caren	Schaffner
MCIWorldcom	Rick	Whisamore
Momentum Business Solutions Inc.	Peggy	McKay
Network Telephone	Joanne	Baxter
Network Telephone	Mitch	Dantin
Network Telephone	Brent	McMahan
NewSouth Communications	Chris	Connelly
NewSouth Communications	John	Fury
NOW Communications	Joe	Clark
NOW Communications	Steve	Sulak
Talk.com	Susan	Chapman
Talk.com	James	Childress
Talk.com	Sharon	Eleazer
Talk.com	Page	Miller
Xspedius	Karen	
Z-Tel	Barbara	Shever

**UNE-P USER GROUP ATTENDEES
May 23, 2001**

Exhibit No. BMTS-3
FPSC Docket No. 960786-TL
Page 5 of 5

BELLSOUTH PARTICIPANTS

David Allen
Rita Barrett
Georgia Christenas
Sandra Davis
Rendy Dinovo
Margaret Garvin
Marilyn Hyman
Joe Jones
Susan Jones
Saron Judy
Richard Lee
Jim Maziarz
Lynette Nall
Ellen Shepard
David Stark



Denise C. Berger
District Manager
Local Supplier Management

1200 Peachtree Street, NE
Promenade I, 12th Floor
Atlanta, GA 30309
404 810-8644
FAX 404 810-8477
PAGER 800 258-0000 PIN 2589558
EMAIL deberger@att.com

May 25, 2001

Ken Ainsworth
BellSouth Telecommunications
675 West Peachtree Street
Room 27A80
Atlanta, Georgia 30374

RE: UNE Platform Provisioning Problems

Dear Ken:

Thanks again for lunch last week. I enjoyed the conversation and share your interest in making the operational processes between our two companies work more effectively and efficiently. During our conversation, I mentioned problems that AT&T was having with UNE Platform orders. Following are the details on the problems we are having.

1. ***BellSouth's use of a "D" and "N" order to provision UNE-P orders is not effective in migrating customers from BellSouth to AT&T.*** Although BellSouth informed the CLEC community during the Louisiana Workshops that a fix was implemented on April 6, 2001, the orders are not relating and the fix has quite obviously not worked. AT&T has several examples of customers' whose service translations have been disconnected when BellSouth works the "D" order, while it fails to work the related "N" order. Attachment 1 will outline the specific information relevant to those customers experiencing a problem. The problem, however, is not unique to AT&T. It is my understanding that Birch Telecom has experienced a similar problem at least 40 times and has presented this information to BellSouth through the user's group process. At the last UNE-P User Group meeting, BellSouth, after much discussion by the CLECs, admitted to a problem with the April solution. Apparently, BellSouth has pulled together a task team to address the issue by generating a "C(hange)" order. However, estimated delivery of this solution was End-of-Year 2001. This is not an acceptable timeframe for a solution.
2. ***BellSouth's linkage between its Provisioning center and processes and its Maintenance center and processes is not effective for UNE-P customers.*** When AT&T has received calls from these customers experiencing problems, our Maintenance Center attempts to refer this to the BellSouth Maintenance

Center, since these are post-provisioning problems. The BellSouth Maintenance Center personnel are not seeing the migrated customer record and consequently not taking the maintenance ticket. In one instance, an AT&T UNE-P customer, [REDACTED], lost dial tone on Saturday, May 5, 2001. Dial tone was not restored to this customer until Tuesday, May 8, 2001. Attachment 2 to this letter details the difficulty that AT&T experienced relative to this customer's service problem. AT&T received a completion notice on our order. However, it appears that BellSouth only worked the "D" order. I have several questions on this situation, which would apply to all similar UNE-P maintenance issues.

- ♦ If the original AT&T due date was May 1, 2001, and AT&T received a completion notice from BellSouth on May 2, 2001, why did the customer not lose service until May 5, 2001?
- ♦ Is it the practice of BellSouth to send the completion notice out before all orders are completed within the BellSouth systems?
- ♦ On May 5, 2001, at 20:20, Al at BellSouth said that the porting order was cancelled. UNE-P does not port numbers. Was Al perhaps referring to the "N" order?
- ♦ Why did BellSouth not handle this as a maintenance issue? The customer was out of service three days. There appears to be nothing that AT&T nor the customer could have done to prevent the out of service condition.
- ♦ It was quickly apparent to the BellSouth personnel involved that the problem was caused by BellSouth's failure to process the "N" order. Why was the burden on AT&T to call around to find someone to help solve the problem? Why didn't one of the BellSouth representatives "own" the problem and insure that AT&T got to the right place for resolution? It seems that we lost a vast amount of time due to bouncing around within BellSouth trying to find an organization that could resolve the issue.
- ♦ We have many instances of customers who report "No Dial Tone" problems to AT&T after the conversion of their service. Once BellSouth dispatches a service technician, the problem disappears. Since the conversion to UNE-P is, for all intents and purposes, a records order change, why does the customer lose dial tone? What is the technician dispatched to do?
- ♦ Are UNE-P customers, who were on IDLC facilities prior to their conversion to AT&T, left on the existing facilities or are they changed to universal or copper facilities before the conversion?

As AT&T's volume of UNE-P orders increases, the number of problems experienced will increase as well, which will have significant impact to our customers and to our brand. I would like to understand BellSouth's action plan and timeline for delivering a remedy to the order relationship issue. I would also like to know what BellSouth plans to implement to treat these types of problems as maintenance problems, with the associated 24-hour resolution, instead of a three-day or more new order problem.

RE: UNE Platform Provisioning Problems
Page 3 of 3

Ironically, the customer's perception is that the problem must be caused by AT&T, since they did not have similar difficulties when they were provided local service by BellSouth. Because of this perception, they are many times inclined to switch back to BellSouth, where the cause of the problem lies. I will appreciate your response no later than Friday, June 1, 2001.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Terry", with a large, sweeping flourish extending to the right.

cc: Greg Terry
Jan Burriss

**UNE-P ORDERS WITH
ASSOCIATED TROUBLE TICKETS**

The following PONs are examples of AT&T's experience in BellSouth's ineffective use of a "D" and "N":

AT&T Order Number	Associated BellSouth Order Number
ATLY0101093	N08BDXV8
ATLY0101866	NO2NLJT0
ATLY0101693	N00D34P4
ATLY0101796	N07PVPY7
ATLY0101457	N028RTX4
ATLY0101438	N07Q68B5
ATLY0101927	N01GYFF1
ATLY0101442	N0FYTP11
ATLY0101490	N06MPX94
ATLY0101157	NOCT3VR0
ATLY0101260	N00LRNQ7
ATLY0101297	N0GL8T01

UNE-P TROUBLE TICKET LOG NOTES

NO.	DATE AND TIME	DETAILS
1.	5/5/01 19:58	Ticket created; customer has no dialtone on [REDACTED]; UNE-P connectivity; customer turned up on May 3, 2001
2.	5/5/01 19:58	Ticket saved
3.	5/5/01 19:59	Ticket picked up
4.	5/5/01 20:20	Called BellSouth at 888 461 0612, spoke with Al and he said that the order that was porting the customer to AT&T was cancelled. He gave me order #NR8D54T4. He said that he could not tell when that order was cancelled. He said that he has limited systems to check on the order.
5.	5/5/01 20:24	Unable to refer the trouble to BellSouth. Need the port over order #. Have to talk to MACD or Provisioning on Monday to get the order #.
6.	5/6/01 07:27	Customer wants his service up and working now! I called BellSouth and spoke with Renee at 888 461 0612. She says the system she needs to check our orders is down today but she does see a disconnect of the customer's line on 5/3/01 with no new reconnect. Customer just needs his service working. Will try to get him reconnected through BellSouth. Called BellSouth repair and spoke with Debbie and she said if customer wants back in service with BellSouth he will have to wait until Monday. No provisioning managers on call or available to assist him. The only other thing I can do today is page BellSouth's duty manager at 800 946 4646, PIN #1403974. Will wait and see if they call back before I call the customer.
7.	5/6/01 07:44	Erica Pearson, the weekend duty supervisor, returned call. Said there is nothing they can do until Monday, but she will personally call the provisioning folks and try to get this handled for me. She gave me her direct line # 404 541 4009 to call her on Monday so she can get the right people involved to fix the situation.
8.	5/6/01 7:48	Called customer and explained Monday AM is earliest can get anyone to work with me on this. He accepted that, but still is not happy. I advised we would call him back with update Monday after speaking with BellSouth.
9.	5/7/01 08:31	Called customer's number. Reaching RNA. Called Erica Pearson @ 404 541 4009. She said she would call me right back. Waiting on her callback.
10.	5/7/01 09:52	Erica has not called back, so starting over. Called BellSouth Non-Design Maintenance at 888 461 0612.

UNE-P TROUBLE TICKET LOG NOTES

		Spoke with someone who said records show the "D" order on 5/5/01 and a pending "N" order # NR5FP5W3 to reconnect to AT&T resale, but shows pending in the system. She said to expedite I should call the LCSC. Calling LCSC @ 800 871 4404 and spoke with Catherine. She couldn't locate the order. I gave her our PON and the phone number. She will research and call me back.
11.	5/7/01 09:52	Sharrie calling back from BellSouth with status. Erica called me back. I advised what Non-Design Maintenance said and she advised that she is going to get a Non-Design Maintenance Manager involved in this right away.
12.	5/7/01 09:58	Catherine with the LCSC called. She has been unable to locate any information on this and has forwarded all of the info to the original rep who input the order. She will call me back when she hears something.
13.	5/7/01 10:03	Received callback from Sheree, a manager in Non-Design Maintenance. She has me on hold and is checking into this now. Sheree came back and said she does see the order # still pending in the system and it was never worked. She is putting in a ticket and sending it to a technician at RCMAC to get it worked. She will have tech call me back with status and ticket #.
14.	5/7/01 10:06	Catherine and Steven called from Non-Design Provisioning. I advised what Sheree was doing and they advised they wouldn't handle this anyway so they will let her take care of this.
15.	5/7/01 10:17	Sheree with BellSouth calling back and said the service order needs a new due date. They can't open a new ticket because service order is past due. Order NR5FP5W3, original due date 050101. Said for me to call LCSC.
16.	5/7/01 10:18	Called 800 872 3116 for BellSouth LCSC
17.	5/7/01 10:30	Customer called to request status. Advised he was completely out of service and ask that I escalate.
18.	5/7/01 11:09	Called LCSC at 800 872 3116 and spoke with Alicia. Was on hold for a while, then someone else came online. I must have been transferred. Now speaking with Mary. She found the order but has to transfer me back to someone else. Mary says I need to speak with someone in the UNE Combo for small business group. She transferred me to someone who said she can't talk to CLECs and we are supposed to speak with managers, not them. She said to call back in and speak with someone

UNE-P TROUBLE TICKET LOG NOTES

		<p>else. I am trying first level escalation contact listed in KMS, Dan Haley @ 404-532-2072. Only reached his voice mail. I will go back and try this one more time. Called the number listed in KMS for LCSC at 800 871-4404. That is the ACAC center and they cannot help either and didn't know where to send me. I am now trying the 2nd level, Linda Stewart per KMS at 404 532-2118. Her voice mail directs me for order related issues to contact either Elaine at 404 532-2260 or 404 532 2114. Called 404 532 2260 and spoke with someone who handles only AT&T circuits, not POTS lines. Tried 2nd level Reginald Glover 770 493-3471. He also only handled special AT&T circuits and couldn't assist me.</p>
19.	5/7/01 11:38	Called 800 872 3116 and spoke with Terry who put me on hold for a long time. Then the line disconnected.
20.	5/7/01 13:22	Called Orlando provisioning center to get help with this customer order.
21.	5/7/01 16:33	This is being handled by the UNE-P BellSouth resale group. Venice is working it and will escalate to the night manager if not cleared before she leaves at 8:00 PM tonight.
22.	5/8/01 06:30	Received a call from AT&T Provisioning giving me a status. There is a ticket on this and a tech is being dispatched out this morning around 8:30. He will call back with status.
23.	5/8/01 10:25	Received a call from AT&T Provisioning. They have tested the line and it appears to be working.
24.	5/8/01 12:09	Called customer. Confirmed the number has been working since this morning and all is OK.

BellSouth Self-Reported Type I System Outages
 as Posted on BS' Change Control Site

Month & Year	BS EDI System		BS LENS System		BS TAG System	
	# Outages	Duration Range	# Outages	Duration Range	TAG	Duration of Outages
Aug-00	1	62 hours	4	1 hour	7	40 min - 4.5 hours
Sep-00	1		2	50 min		
Oct-00	1	2 hours	16	30 min - 9 hours	5	40 min - 5.5 hours
Nov-00	1	3 days	15	30 min - 7 hours	4	1 hour - 7 hours
Dec-00			26	30 min - 11 hours	5	30 min - 1 hour
Jan-01			14	30 min - 5 days	8	10 min - 7 hours
Feb-01	3	12 - 18 hours	17	30 min - 7 hours	17	10 min - 5 hours
Mar-01	5	4 - 63 hours	15	30 min - 8 hours	13	20 min - 2.5 hours
Apr-01	5	30 min - 28 hours	10	30 min - 6 hours	11	1 min - 16 hours
May-01	16	30 min - 10 days	11	30 min - 22 hours	2	10 min - 1 hour
Jun-01	3	4 - 69 hours (LNP related)	14	10 min - 23 hours 3 min	8	19 min - 69 hours (LNP related)
Jul-01	2	4 hours - 16 min - 13 hours	9	15 min - 3 hours 29 min	2	20 min - 13 hours
OTAL for 11 Months	37		153		82	
LENS/TAG: Open Issue not yet reported on sites by BST: since June 4 through July 28 (date fix due per BST) UNE P orders are getting FOC Due Dates greater than standard interval of 0 or 1 day. We are seeing 3 - 5 day intervals on at least 40% of our UNE P orders which is incorrect = CR 0445						
See BS Type I Systems Outage URL: http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_so.html						