BELLSOUTH TELECOMMUNICATIONS, INC.

SURREBUTTAL TESTIMONY OF ALPHONSO J. VARNER

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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DOCKET NO. 960786-TL

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

A. My name is Alphonso J. Varner. I am employed by BellSouth as Senior Director in Interconnection Services. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my Rebuttal Testimony is to respond to Testimony filed by certain Competitive Local Exchange Carrier (ALEC) Witnesses in this proceeding as relates to the BellSouth Service Quality Measurements (SQM) and the integrity of the SQM data. With regard to performance data, my Rebuttal Testimony confirms the following points:

- BellSouth's performance data is reliable;
- BellSouth's performance data demonstrates that BellSouth is in Compliance with the requirements of Section 271 of the Act;

- BellSouth's Monthly State Summary (MSS) report is an appropriate tool to us in assessing BellSouth's performance.

Q. GIVEN THE PURPOSE OF YOUR TESTIMONY AND THE CRITICISM BY ALECs WHAT IS THE ROLE OF PERFORMANCE MEASUREMENTS?

A. Performance data is just one of many tools available to evaluate performance. Because performance data is quantitative, there is a natural tendency to try to use it as a simple way to answer a complex question. That question is at the core of this proceeding – namely – Is BellSouth providing non-discriminatory performance to ALECs?

To answer that question requires using performance data simply as an additional tool in deciding whether BellSouth is meeting its obligations. Performance data must be used in conjunction with the other evidence to evaluate performance. Each of BellSouth's witnesses illustrates how BellSouth meets its obligations. It would be a mistake to ignore their testimony when evaluating performance and simply substitute a set of numbers for it.

For example, lets look at the trunk blockage measure. BellSouth has a measure that compares ALEC performance to BellSouth performance during the same time periods. But to truly understand BellSouth's performance, the numbers must be viewed in the context of Mr. Milner's

testimony regarding the processes used to provision trunks. The testimony of BellSouth's other witnesses is at least as vital to performance evaluation as the numbers are. In fact, where transaction volumes are low, that other testimony is a far more important basis, if not the only basis, for conclusions regarding performance.

To utilize performance data effectively, a few criteria need to be met. First the number of transactions has to be high enough for the measurement to be meaningful. Second, the measurement has to be designed to measure the area of performance being evaluated. Also, the performance standards have to be reasonable. Under these conditions, performance data can be an effective tool. But it is only a tool not a substitute for an overall evaluation

Q. WHAT IS YOUR OVERALL ASSESSMENT OF THE DATA TESTIMONY TO WHICH YOU RESPOND?

A. The testimony of the ALEC witnesses has not identified any systemic deficiencies in the performance data that would impact the Commission's ability to evaluate BellSouth's performance. My testimony shows that many of their so-called deficiencies are unfounded. The remainder are largely a combination of isolated old occurrences, mischaracterizations of the data, objections to update schedules or attempts to define differences in position as errors. Apparently, the ALECs' strategy is to make

voluminous claims, however meritless, in an attempt to persuade the Commission to unnecessarily delay BellSouth's interLATA entry.

Q. GENERALLY HOW IS PERFORMANCE DATA PRODUCED?

A. Ms. Norris Exhibit SEN-4 shows the primary data collection processes used by BellSouth to generate the Interim SQM reports. Interim SQM reports are based on the source data captured in BellSouth's legacy/source systems. BellSouth employs three primary delivery processes to transform the legacy system data into the published Interim SQM reports; i.e. PMAP, BARNEY, and Manual. I will describe each of these methods more fully below.

Before assessing the integrity of BellSouth's performance measurement data, it is important that the Commission understand the sheer magnitude of the systems and processes that BellSouth has implemented to produce that data. BellSouth's performance data system is called the Performance Measurements Analysis Platform (PMAP).

The massive size of PMAP is a key factor that should be kept in mind when assessing the impact of the ALECs' claims regarding data. A system this large cannot be flawless, and the volume of data produced should be considered when assessing the inferences ALECs make about the integrity of data. PMAP approaches the size of the Internet in 1999, and processes about 100 million records each month. I will discuss this

point further in a moment. In addition, PMAP has been audited and will be audited each year for the next five years.

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Q. IN MS. NORRIS' TESTIMONY ON PAGE 7 SHE DISCUSSES HOW BELLSOUTH'S DATA COLLECTION AND PERFORMANCE MEASURES REPORTING SYSTEMS WORK. IS HER EXPLANATION ACCURATE?

A. No. Specifically, Ms. Norris inaccurately describes the processing that takes place between BellSouth's SNAP and PMAP Staging database. There are, in fact, no business rules or exclusions applied to the early stage data in the SNAP database before it is sent to the PMAP Staging database. Staging is simply a copy of the SNAP data as Ms. Norris' Exhibit SEN-4 reflects.

Q. CAN YOU FURTHER DESCRIBE THE SYSTEMS AND PROCESSES BY WHICH BELLSOUTH CALCULATES THE SQM DATA?

A. Yes. PMAP is the system in which the majority of the SQM values are produced as shown in Ms.Norris' Exhibit SEN-4. The source data accumulated in the legacy systems are transferred to the Interexchange Carrier Analysis and Information System (ICAIS). These data transfers are initiated and executed by automated scripts. Each month a "snapshot" of the ICAIS data is extracted into the SNAP database. The combination of ICAIS and SNAP constitutes BARNEY. This monthly "snapshot" of data is typically referred to as "early stage data" but Ms. Norris calls it raw data which creates some confusion. SNAP is then copied into PMAP Staging, the database used to store the data that will be analyzed and processed to generate the final SQM values. From Staging, the data tables are transferred to the Normalized Operational Data Store (NODS), which puts the data into a normalized format. NODS then passes the data to the Dimensional Data Store (DDS), which summarizes and aggregates the data. The final SQM reports are generated by queries run against the DDS data. The data from NODS are also used to generate the data files made available to the ALECs and utilized by BellSouth to validate the final SQM reports. These files are the raw data that BellSouth provides. No data exclusion or business logic is applied to the records prior to the transfer of data into the NODS database.

Finally, the nature of several Interim SQM reports, e.g. billing, requires that the bulk of the data collection and processing requirements be executed manually, using spreadsheets and other simple database management tools. For these reports, the process owner for each

manually produced Interim SQM is responsible for collecting and formatting the legacy system source data that is loaded directly into the PMAP DDS database. The Interim SQM reports are then generated by queries run against the DDS data using the same final process step employed for PMAP results reporting.

Q HOW LARGE IS PMAP?

A. PMAP is enormous. In order to have a feel for just how big the PMAP database is consider that 86 million records composing 110 Gigabytes of data had to be transported and processed to produce the March 2001 Interim SQM results and the volume grows each month. To put this in perspective, one page of my testimony would require about 2 Kilobytes of storage. PMAP, therefore, processes the equivalent of 55 million pages each month.

In addition to monthly processing, data must be stored for multiple months in the PMAP database. The current PMAP database is approximately 2.5 Terabytes in size or 1.25 billion pages of text documents, or the equivalent of 312,500 cases of paper. To put this into perspective, a 1999 study by Sarnoff Corporation on behalf of the US government put the size of the entire Internet in 1999 at approximately 3 Terabytes. (http://*www.wavexpress.com/faq.ht*ml). More importantly, BellSouth's performance measurements have nearly exhausted the capability of the existing PMAP system. As a result, BellSouth is implementing a next

generation PMAP platform, PMAP-NG, which is currently in development. When implemented, PMAP-NG will start processing the data on a daily basis as opposed to taking a snapshot of all the data once a month and then processing that data over a two-week period, which is what PMAP does currently. Consequently, BellSouth estimates that PMAP-NG will process 1,250 million records composing over 400 Gigabytes of data and the PMAP-NG database is estimated to be 4.5 Terabytes in size.

Q. WHAT OTHER SIGNIFICANT RESOURCES DOES BELLSOUTH DEVOTE TO PERFORMANCE MEASUREMENTS?

A. In addition to the enormous PMAP system processing 100 million records each month, BellSouth has over 300 people devoted to the production of performance measurements. These resources are required to produce the 2200 sub-metrics in the Interim SQM.

Q. HOW IS PERFORMANCE DATA VALIDATED?

A. BellSouth's Interim SQM data is verified and validated in several ways to maintain the integrity of the data and insure that no data is lost. First, BellSouth's systems have internal quality assurance controls. Second, BellSouth has implemented manual data validation processes within and between data processes. These checks take place for both BellSouth data and ALEC data. Third, BellSouth has undergone a stringent Third Party Audit of its performance data generation process conducted by KPMG as

ordered by the GPSC. Finally, PMAP will be audited annually by an outside auditor.

BellSouth's systems execute a number of validation checks to ensure that no records are lost between databases from the legacy systems to PMAP staging. In addition, raw data validation scripts are used to insure that the raw data made available to ALECs on the Web can be used to produce the PMAP reports posted to the Web.

BellSouth also performs a number of manual validation processes on the data each month to assess its accuracy and completeness. These validation processes can be divided into two categories – code validation and business validation. In the first process, the data production team analyzes and validates the computer code. This team validates the computer programming to insure the data is produced in accordance with the code. The second data validation process is conducted by the Data Analysis team. The Data Analysis team is a group of Business Analysts, who perform reasonableness checks on the data. For example, they may review data for the current month compared to the previous month to see if volumes or volume changes are reasonable from a business standpoint. Another function of the Data Analysts is to insure that accurate Interim SQM Definitions, Business Rules, and Exclusions are applied to the data. Similarly, experts in the field (Network Operations, Local Carrier Service Center (LCSC)) review the performance results to validate that the results are reasonable.

Q. HAVE BELLSOUTH PERFORMANCE MEASUREMENTS SYSTEMS AND PROCESSES BEEN INDEPENDENTLY REVIEWED?

A. Yes. KPMG conducted a metrics evaluation in connection with the Georgia Third Party Test. Although in some cases the measures that KPMG evaluated were different than the measures in the Interim SQM, the systems and processes that were audited are the same as those from which the current Interim SQM is reported. For the data integrity test criteria, BellSouth has satisfied 409 out of 420 (97%) test criteria. Ten of the other criteria are not complete, meaning that KPMG has more work to do. KPMG currently is conducting a second audit of BellSouth's performance metrics to address those measures that have been added or changed since the first audit. This audit will complement the audit that KPMG has already conducted.

In addition, the yearly audit of BellSouth's performance data collection and analysis conducted by an independent audit firm will continue to insure the integrity of BellSouth's performance data. In its Massachusetts Order, the Federal Communications Commission (FCC) recognized the value of such audits in maintaining data integrity. See Verizon- MA Order CC Docket 01-9 dated April 16, 2001, para 247.

Q WHAT REPORTS DOES BELLSOUTH PROPOSE FOR THIS COMMISSION TO USE IN EVALUATING PERFORMANCE?

A. BellSouth proposes that this Commission use the Monthly State Summary (MSS) reports as the means to assist the Commissions in evaluating BellSouth's compliance with the InterLATA checklist. The MSS is the only report that provides statewide aggregate data for all ALECs in Florida with a comparison to benchmarks of retail analogs. The MSS also displays this data in a format with which the FCC and Department of Justice (DOJ) are familiar. Further, when the ALEC witnesses refer to BellSouth s performance in their testimony they are referencing performance as reported in the MSS.

Q. PLEASE DESCRIBE THE MSS DATA TO WHICH YOU AND THE ALECS REFER?

B. The MSS provides data in accordance with the measurements, business rules, and calculations that this Commission recently adopted in Docket 960786-TL, order dated July 2, 2001. However there are some minor differences in the benchmarks because the MSS can only be produced consistent with the SQM in one state. Since Georgia had the initial requirement to produce statewide data, the MSS uses the Georgia SQM as its basis. Except for measurements for collocation, change management and BFR-2, the standards in the MSS equal or exceed those in the Florida Interim SQM

AT&T WITNESS- DENISE BERGER

Q. TURNING FIRST TO AT&T WITNESS DENISE BERGER, WHO ON PAGE 13 OF HER TESTIMONY, STATES THAT BELLSOUTH DOES NOT RETURN FOCS FOR HOT CUT ORDERS IN A TIMELY MANNER. DO YOU HAVE A COMMENT ON THIS ASSERTION?

A. Yes. Ms. Berger states that in Florida in May 2001, BellSouth returned 51.22% of FOCs for Partially Mechanized orders to AT&T in greater than eighteen hours. This claim is not correct. In Florida, AT&T has three OCNs that showed product volume for Partially Mechanized Orders in May. Based on the May 2001 PMAP reports for AT&T, for Partially Mechanized FOCs in Florida, BellSouth returned 96.25%, or 334 LSRs, FOCs within 18 hours versus a benchmark of 85%.

Q. ON PAGE 24 OF HER TESTIMONY, MS. BERGER STATES THAT ALTHOUGH BELLSOUTH'S PERFORMANCE IN THE LCSC HAS IMPROVED, IT STILL FAILS TO BE IN PARITY WITH BELLSOUTH'S RETAIL BUSINESS SERVICE CENTER (BSC). DO YOU AGREE?

A. No. As an initial matter, the proper retail analog for the Average Speed of Answer is the BellSouth retail units, which consists of the Business and Residence Service Centers. Thus, Ms. Berger's reliance solely on the Business Service Center Answer Times conflicts with this Commission's conclusions. In addition, while the LCSC has experienced problems in the past with hold times that were longer than desirable, the April and May

2001 Monthly State Summary reflects that the Average Speed of Answer for the LCSC is at parity with the Retail Analog. This improvement is largely due to the creation of the Fleming Island LCSC that was implemented in late January 2001. Operating solely as a call center, the Fleming Island LCSC has been able to handle calls faster and more effectively.

Additionally, having the Fleming Island LCSC allows the Birmingham and Atlanta LCSCs to concentrate on processing orders, thus creating efficiencies. Further, Ms. Berger has no basis for her inflammatory assertion that we are providing second-class service to ALECs because they are our competition. In fact ALECs have superior service in some respects. For example, consider that for most BellSouth retail customers to place orders or obtain status information, they must call the appropriate service center. While for an ALEC, no call is required to order service and they can obtain status if utilizing the electronic options or the web-based reports. Finally, Ms. Berger's complaint that the appropriate retail analog should be the BellSouth business center alone is not correct. The LCSC handles both residential and business orders – thus, it makes perfect sense to assess its performance against a combination of performance for the BellSouth residential and business centers.

Q. ON PAGE 24 OF HER TESTIMONY, MS. BERGER STATES THAT THE LCSC ANSWER TIME MEASURE DOES NOT INCLUDE THE HOLD

TIME EXPERIENCED BY ALECS WHEN THEY ARE PUT ON HOLD AFTER THE CALL IS ANSWERED. HOW DO YOU RESPOND?

A. Ms. Berger is correct in stating that the average answer time does not include the hold times once the call is initially answered. The LCSC answer time is based on the Interim SQM. The purpose of the metric is not to see how long it takes to correct a problem, but the length of time it takes BST to respond to an ALEC call to the LCSC. ALEC issues that require calls to the LCSC vary significantly in complexity and therefore the amount of hold time after the initial contact, assuming representative consultation or referral is required, reflects nothing relevant about LCSC answer time. Interestingly, the ALECs including AT&T, did not propose, a measurement to address this alleged issue in the Commission's recent performance measurement proceeding. Further Ms. Berger provides no information about specific instances to permit verification of her allegations.

Q. PLEASE ADDRESS MS. BERGER'S ASSERTIONS ON PAGE 27 REGARDING THE NEW YORK HOT CUT MEASUREMENTS.

A. On page 27 of Ms. Berger's rebuttal testimony, she states that BellSouth is not performing at an acceptable level when compared to the Bell Atlantic New York Order. This Commission cannot rely on Ms. Berger's calculations. The measurement in New York is different from BellSouth's because the start and end of the hot cut for each line on an order is

different. The New York measure begins with the first line on an order and ends with the completion of the last line on an order. BellSouth measures the time to cutover each line on an order. Because BellSouth does not provide the data to calculate the measures used in New York, it is unclear how Ms. Berger calculates her numbers, let alone whether or not they are correct. To use an analogy, Ms. Berger is simply attempting to use centimeters to measure something that several commissions in BellSouth's territory have decreed should be measured in inches.

Further, her calculations are very questionable when one considers that our measurements, which are more exact than New York's show that we are performing adequately. This Commission recently adopted hot cut measurements structured the same as the measurements that BellSouth is using. These measurements have been a topic of discussion and debate in Florida, Georgia and Louisiana. These Commissions heard the opinions of all parties, including AT&T, and issued an order on hot cut measurements. BellSouth's measurements reflect these orders.

ADDITIONAL RESPONSE TO AT&T WITNESS- SHARON NORRIS

Q. HAS BELLSOUTH PRESENTED PERFORMANCE DATA AS REQUESTED BY THE FLORIDA COMMISSION?

A. Yes. BellSouth has posted the MSS to the website and will file the Florida MSS in the Third Party Testing Docket.

Q. ON PAGE 5 OF HER TESTIMONY, MS. NORRIS IMPLIES THAT PENALTY PAYMENTS IN GEORGIA INDICATE POOR PERFORMANCE. CAN YOU ADDRESS THESE PAYMENTS?

A. Yes. Except for two instances which I describe later, the penalties that BellSouth paid in Georgia are the result of system problems, random occurrences or flawed measurements. The following describes the causes of the payments.

Tier 1 Penalties for March and April

1) LNP Average Disconnect Timeliness ($2.3M): No performance deficiencies indicated, the measurement is flawed as I will describe later. BellSouth filed a *Motion to Modify the Service Quality Measures* with the Georgia Commission indicating that this metric is inadequately defined and proposing several alternative metrics to either augment or replace the existing one. As a result of BellSouth's motion, the Georgia Commission requested that BellSouth report performance results for the following three additional LNP conversion metrics, and to continue to report results for a modified LNP Average Disconnect Timeliness metric:

   - Percent Out of Service < 60 Minutes
   - Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date

- LNP Average Disconnect Timeliness for Non-Trigger Orders

These new metrics will be reported beginning with June results, and payments under all LNP measurements will be held in escrow until the conclusion of the six month review, when the Georgia Commission will rule on the retroactive penalties to be paid to the ALECs beginning June 2001.

2) Order Completion Interval – Loop Port Combos ($1.6M): These penalties are the direct result of a legacy systems coding problem which assigned certain "non-dispatch" orders the longer "dispatch" order installation interval. BellSouth implemented an interim manual process to identify, review, and correct these orders in mid-June and plans to deploy a permanent mechanized fix in October, 2001. Since BellSouth did not implement the manual fix until mid-June, the full impact will not be reflected until July results are published. This performance problem has been identified and corrected. In addition, for March 2001 particularly, BellSouth was incorrectly including orders where the ALEC requested a longer than normal due date in OCI. This practice understates BellSouth's performance and a concerted training effort has been undertaken to resolve it.

3) Order Completion Interval – POTS ($1.5M): These penalties were caused by the same issues described under Order Completion Interval-Loop/Port Combos

4) Customer Trouble Report Rate – UNE Loops ($0.7M): Once again, BellSouth met the standard for ALEC aggregate performance in Georgia. These Tier 1 payments represent random occurrences, not a systemic performance problem.

5) Other Tier 1 Metrics ($0.9M): Except for FOC/Reject Completeness ($0.1M), the penalties for the other SEEM submetrics are the result of a number of small payments to individual ALECs on measurements for which BellSouth generally meets the ALEC aggregate performance standards. BellSouth has already acknowledged that the FOC/Reject Completeness measurement was unreliable in March, April, and May and incorrectly understates BellSouth's performance. Thus, no systemic performance problems have been identified.

Q. ON PAGES 3-4 OF HER TESTIMONY, MS. NORRIS FURTHER IMPLIES THAT GEORGIA PENALTIES INDICATE THAT MAY 2001 PERFORMANCE IS POOR. PLEASE EXPLAIN.

A. Three of the same SEEM submetrics discussed for March and April also drove 88% ($4.4M of $5.0M) of the May penalty payments, and for the same reasons described above:

- LNP Average Disconnect Timeliness ($3.4M)
- Order Completion Interval – Loop+Port Combo ($X0.7M)
- Order Completion Interval – POTS ($X0.3M)

Likewise for May, the remaining penalties are for random individual ALEC occurrences for measures where the aggregate performance standard is usually met. Consequently, the only performance problem identified (OCI-COMBO POTS) has been corrected.

Q. ON PAGE 4 OF HER TESTIMONY, MS. NORRIS ADDRESS TIER 2 PENALTIES. HOW DO YOU RESPOND?

A. Again, three SEEM submetrics account for 97% ($8.0M of $8.2M) of these Tier 2 payments to the state of Georgia. Two of the submetrics, LNP Average Disconnect Timeliness, which is flawed as discussed earlier, and Order Completion Interval – POTS, were discussed under Tier 1. The same conditions applicable for these measures under Tier 1 also apply under Tier 2. The third measurement, OSS Average Response Interval, is confined to one system, HAL/CRIS, accessed via the LENS interface. That interface is returning responses in 13 seconds compared to its retail

analog of 4 seconds. The system fix for this problem was implemented on July 27, 2001.

In summary, most of the Tier 1 and Tier 2 penalty payments (over 85%) are confined to three or four measurements. For those two measures where a system problem was indicated, the problem has already been fixed. This SEEM data provides no basis for claiming discriminatory performance.

Also, Ms. Norris' testimony in this area contradicts much of the remainder of her testimony. Much of Ms. Norris' testimony is devoted to convincing the Commission that BellSouth's measurement data is unreliable. However, when it comes to penalties, she accepts that same performance data as reliable enough to draw conclusion about BellSouth's performance. Ms. Norris can't have it both ways.

Q PLEASE EXPLAIN FURTHER WHY THE LNP DISCONNECT TIMELINES MEASURE IS FLAWED?

A. The current measure: (1) does not accurately capture the customer's experience when the customer's telephone number is ported; and (2) includes activities in the porting process over which BellSouth has no control.

As the Commission is aware, LNP allows a customer to keep his or her

telephone number when telephone service is transferred from one local exchange company to another within the same calling area. The number portability feature works by utilizing a centralized database that houses all ported numbers and provides proper routing of calls to and from these numbers. When an order involving LNP is being worked to port a telephone number from BellSouth to the ALEC, both BellSouth and the ALEC must take certain actions in order to enable the ALEC's new end user to make and receive calls using the ported number.

On a great majority of LNP orders, BellSouth creates what is referred to as a "trigger" in conjunction with the order. This trigger gives the end user customer the ability to make and receive calls from other customers who are served by the customer's host switch at the time of the LNP activation. This ability is not dependent upon BellSouth working a disconnect order. In other words, when a trigger is involved, an end user customer can receive calls from other customers served by the same host switch before the disconnect order is ever worked.

On trigger orders, end user customers also can make and receive calls from customers not served by the same host switch before BellSouth works the disconnect order. Because all of the switches in the BellSouth network other than the host switch are updated via routing data that is delivered to each of BellSouth's Service Control Point ("SCP") databases. These routing messages are delivered by a system known as LSMS, which is operated by and under the control of BellSouth. Thus, the end

user has the full ability to make and receive telephone calls on ported numbers involving a trigger as soon as the LSMS message is sent to all SCPs, even though BellSouth has not yet disconnected the customer from its translations in the BellSouth host switch.

However, as it currently exists, Performance Measure, P-13, does not recognize the importance of triggers and their effect on the LNP process even though such orders account for 90% of LNP orders. Rather, the current measure calculates the end time of the LNP activity as the processing of the actual disconnect order in the host switch, even though, from a customer's perspective, this activity is totally meaningless. It is the activation of the LNP and the routing function accomplished by the LSMS that ultimately determines whether the end user is back in full service and is able to make and receive calls when a trigger is used in porting a telephone number. So, while BellSouth may be missing this measure, the actual impact on ALECs and their end users, is minimal.

As discussed earlier, the Georgia Commission has ordered new measurements due to the problems with the current measure and has suspended SEEM payments for it.

Q. ON PAGE 6 OF HER TESTIMONY, MS. NORRIS ALLEGES THAT BELLSOUTH'S DATA IS UNRELIABLE. PLEASE RESPOND.

A. Ms. Norris claims to demonstrate three points on page 6, however she fails to support those claims as I illustrate in this testimony. In assessing the relevance of Ms. Norris; analyses, the Commission should bear in mind that she uses several data months that precede the timeframe of data relied upon in this proceeding. In addition, some of her claims relate to unique situation in Georgia, not Florida.

Q. ON PAGES 5 AND 6, MS. NORRIS COMPLAINS ABOUT BELLSOUTH'S FAILURE TO PROVIDE ALECS WITH ACCESS TO EARLY STAGE DATA. PLEASE RESPOND.

A. AT&T has argued that it should receive "early stage" data, as opposed to "raw data". As previously discussed, "Early Stage" data is the data available in the SNAP database, prior to PMAP processing, as noted in Exhibit AJV-1. Early stage data contains unformatted and unlinked transaction data extracted from a myriad of legacy systems and tables that has not yet been normalized. For example, key data fields pulled from different legacy source system tables may have disparate date and time-stamp formats, unique product identifiers and system-specific activity or status codes, all of which must be normalized in order to be usable. Further, the legacy system "table-joins" necessary to aggregate the transaction-level data required to support the calculation of a given metric result are extremely complex and cumbersome. As a result, there is data in the SNAP database that is neither relevant nor necessary to validate Interim SQM reports.

AT&T repeatedly misidentifies early stage data as raw data. When it complains about the lack of raw data, it is actually complaining about the inabilities to access early stage data. Most of the early stage data excluded from raw data is irrelevant to performance results. For example, I can see no reason why a service representative's identification is relevant to performance results. Once again, AT&T is making much ado about nothing.

Raw data refers to the data that underlies the calculation of performance results in the Interim SQM that are contained in PMAP. The Interim SQM identifies the specific calculations that produce each measurement. Raw data is the individual records that support those calculations. BellSouth is not required by the Act to make raw data generally available. Both Verizon and SBC obtained interLATA authority without providing the equivalent of raw data to the ALECs. Raw data does provide a great degree of detail which, when utilized with the Raw Data Users Manual, allows a ALEC to recreate performance results from the raw data. However, raw data was never intended to identify, nor should it identify, all of the data that was excluded from early stage data.

In addition, some of the data Ms. Norris claims is in early stage data (e.g. all data related to certain OSS transactions), is not maintained even in early stage data. Thus, access to all transaction-level data through e.s.d. cannot be provided.

Q. TO WHAT EXTENT IS RAW DATA PRODUCED?

A. BellSouth produces and publishes ALEC-specific "raw data" in accordance with the December 1997 Georgia Public Service Commission (GPSC) Order in 2 Docket No. 7892-U in re: Performance Measurements for Telecommunications Interconnection, Unbundling, and Resale. In this Order, the GPSC requires that BellSouth "provide access to the available data (i.e., Data Warehouse) and information necessary for a carrier receiving Performance Monitoring Reports to verify the accuracy of such reports." Generally, providing raw data is not a requirement under the Act; however, BellSouth has elected to provide raw data in this manner in each state. In accordance with the Georgia Commission's directive, BellSouth modified the PMAP platform to produce raw data files containing the detailed, ALEC-specific transaction information underlying each applicable Interim SQM report. BellSouth makes raw data available to ALECs via its PMAP website *(https://pmap.bellsouth.com)* and has been doing so for years. In order to assist the ALECs in downloading, interpreting, and using the raw data, BellSouth publishes the Raw Data Users Manual and posts this document to the PMAP website *(https://pmap.bellsouth.com)*. The specific information that BellSouth retains and provides to ALECs in support of each Interim SQM metric is outlined in the Raw Data User's Manual. This document is updated as necessary to reflect any changes made to the reported metrics.

Q. WHY ARE ALECS NOT PROVIDED EARLY STAGE DATA?

A. There are two main reasons why ALECs are not provided early stage data. First and foremost, disclosure of early stage data may jeopardize the confidentiality of each ALEC's data because at this stage, early stage data is not filtered for ALEC-specific data. By filtering by ALEC, PMAP and its raw data files allow BellSouth to protect the proprietary data for each ALEC. Second, it is nearly impossible for ALECs to use early stage data. The size of the files would be so cumbersome, and the amount of data, which includes a high volume of irrelevant data, so great, that ALECs would have to build a PMAP of their own to perform the calculations, exclusions, etc. required to reach the report results. Specifically, they would need to take several gigabytes of data, perform all formatting and normalization across legacy source systems, and generally reduce the total number of ALEC records that must be processed according to the SQM business rules. The work effort would ultimately yield the same data currently provided to ALECs, which then translates into the SQM reports. Briefly, they would have to do everything that PMAP does to turn early stage data into raw data and measurement results. As I've already described PMAP is an enormous system so replicating it would be a huge undertaking for anyone.

BellSouth's raw data allows ALECs to verify the SQM reports. The raw data provided to the ALECs contains all transaction-level details that

aggregate to the values in the SQM report. Thus, ALECs have all the information required to replicate the SQM reports from the raw data. If a ALEC wishes to reconcile its transactions to the SQM values, it can compare its transactions to the raw data transactions.

Q. ON PAGE 8 OF HER TESTIMONY, MS. NORRIS TALKS ABOUT MISSING LNP DATA. PLEASE RESPOND.

A. AT&T brought to BellSouth's attention the missing LNP data for the December 2000 data month on February 12, 2001. BellSouth researched the request and found that AT&T's Operating Company Number (OCN) 7125 was missing from its LNP data due to a coding error. BellSouth responded to AT&T on March 27, 2001 with an explanation that BellSouth would fix the code for the following months.

While BellSouth implemented the coding fix, BellSouth continued posting LNP reports to the PMAP website for all AT&T OCNs, with the exception of OCN 7125, for January, February, and March of 2001. The programming error that BellSouth was able to identify has been fixed for OCN 7125 and all of AT&T's May LNP reports are currently available on the PMAP. Thus, Ms. Norris is incorrect in her claim that BellSouth refused to provide data. These LNP reports are located in the 'Miscellaneous' folder on the PMAP Reporting screen.

Q. ACCORDING TO AT&T, IT HAS BEEN UNABLE TO VERIFY WHETHER THE CORRECTION OF THE SYSTEM ERROR RESOLVED THE ISSUE OF MISSING DATA FOR OCN 7125. HAS THE ERROR BEEN FIXED?

A. Yes. I have personally viewed the report and seen the data for OCN 7/25 for May 2001. Why Ms. Norris can't do so is a mystery. As stated in Carrier Notification Letter SN91082397 dated May 21, 2001, the LNP Flow-Through data report modifications were effective May 7, 2001. Therefore, beginning with May 2001 data, which was run in June 2001, the error was fixed and has had a significant impact on flow-Through percentages.

Regarding Ms. Norris' alleged differences between the LNP FOC and rejection reports for April 2001, she provides no data to substantiate or permit verification of her allegations. However, the reports were accurately posted to the website. If AT&T feels there are discrepancies in April 2001, it would need to provide appropriate ordering data to BellSouth for further analysis.

Q. ON PAGE 10 OF HER TESTIMONY, MS. NORRIS STATES THAT BASED ON MAY 2001 DATA THERE ARE MORE THAN 350 PONS MISSING ON A SINGLE REPORT FOR OCN 7125. PLEASE EXPLAIN.

A. Like the previous issue Ms. Norris has elected not to provide any data to verify or substantiate her claim. Without a list of PONS to analyze,

BellSouth cannot research this claim. However, we have no indication that such an event occurred. I should point out that AT&T has claimed erroneously that PONS were missing when in fact they were properly excluded because AT&T coded them as projects. KPMG has confirmed on their ALEC call on August 16, 2001, that AT&T erroneously engaged in this practice.

Q. MS. NORRIS ALSO CLAIMS THAT BELLSOUTH REFUSED TO PROVIDE RAW DATA FOR LNP MEASURES? PLEASE RESPOND.

A. BellSouth did not refuse to provide LNP raw data. BellSouth publicly disclosed that it would not have the ability to provide the LNP raw data until May 2001. As AT&T already knows, the LNP measures were not originally developed in PMAP. They were developed from the LNP Gateway to expedite production of the measures as the ALECS requested. Until May 2001, there was no way to provide the raw data. LNP raw data is now available to all ALECs. AT&T in this case is knowingly mischaracterizing BellSouth's actions.

Q. ON PAGE 10, MS. NORRIS CLAIMS THAT AT&T FOUND OTHER INSTANCES OF MISSING DATA WHEN SHE COMPARED RESULTS FROM THE PARTIES' UNE-P TEST TO NOVEMBER 2000 PMAP DATA. PLEASE RESPOND.

A. First, this data is from a test in Georgia that significantly predates any data

being relied upon in this proceeding. The test is referred to as Georgia 1000. The trial was entirely defined and controlled by AT&T for its own purposes. The structure of Georgia 1000 plus the age of data precludes its use as a basis for evaluating the integrity of current data. Contrary to Ms. Norris' claim, BellSouth's analysis does not confirm that the data is in fact missing. To the extent we have been able to analyze the data, it shows that much of the problem is attributable to AT&T. For example, 575 of the 577 orders AT&T complains were missing, in fact, had the wrong version number put on them by AT&T. The orders appeared as version "00", but AT&T erroneously asked BellSouth to research version "01".

With respect to the specific "discrepancies" identified by AT&T, there are a number of reasons for the differences cited. BellSouth is investigating why differences exist and whether the problem is caused by BellSouth or AT&T. The current results of BellSouth's investigation are included as an exhibit in Ms. Norris' testimony.

BellSouth is currently waiting on additional data that was requested from AT&T as well as the EDI log files from an internal team before further analysis can be done.

However, AT&T's analysis is irrelevant to the question before this Commission. Its analysis was conducted on data for November 2000. This data significantly predates implementation of the Interim SQM and the attendant programming changes.

Q. ALSO ON PAGE 11 OF HER TESTIMONY, MS. NORRIS ASSERTS THAT AT&T CONTINUOUSLY ESCALATED TO GET AN INVESTIGATION PERFORMED ON THE ALLEGED QUESTIONABLE BELLSOUTH DATA. PLEASE RESPOND.

A. This is another allegation regarding the Georgia 1000 trial and Ms. Norris' description of events is incorrect. What Ms. Norris fails to point out is that BellSouth and AT&T had agreed upon the personnel who would work on the trial, and the data that would be analyzed. AT&T disregarded the agreement. Instead of sending this request to the designated people who would know how to handle it, AT&T sent it to their account team who had no role in this analysis. As AT&T must have known, it was wasteful to escalate this issue within an organization that was neither designated by the agreement nor equipped to analyze the data. It would have been far more productive for AT&T to simply abide by its agreement with BellSouth.

Ms. Norris' continues to misstate the situation in her June letters. AT&T did not provide the information requested by BellSouth, but instead substituted different information. BellSouth will use this information to the extent that it can, but AT&T shouldn't complain about lack of responsiveness when it is unwilling to follow jointly adopted procedures.

Q. ON PAGES 11-12 OF HER TESTIMONY, MS. NORRIS INDICATES

THAT AT&T HAD TO SUBMIT THE SAME INFORMATION TO BELLSOUTH ON JUNE 12, 2001 AND AGAIN ON JUNE 18, 2001, FOR BELLSOUTH TO INVESTIGATE THE ISSUES. CAN YOU EXPLAIN?

A. This claim is further discussion of Georgia 1000 and refers to the data addressed in the previous answer. The issue is covered in the letter sent to Mr. Edward Gibbs of AT&T on June 28, 2001. To summarize, the information that AT&T sent on June 12 was agreed to during a meeting between BellSouth and AT&T on June 8, 2001. The letter that AT&T received was simply a follow-up to that conversation, and not a request to resubmit information. The information originally provided by AT&T had incorrect version numbers for which BellSouth dedicated resources to correct rather than reject the data. Also, the data submitted by AT&T was "alternative" information that BellSouth agreed to try and work with in order to save AT&T the work and expense of providing additional data. This alternative submission results in a greater workload for our people, but we were trying to be as helpful as possible regarding AT&T's requested information.

Q. SHE ALSO INDICATES ON PAGE 12 THAT BELLSOUTH REFERRED TO 113 INSTANCES OF "DUMMY" FOCS THAT WERE NOT REPORTED IN PMAP. WHY IS THIS?

A. "Dummy" FOCs are not actually firm order confirmations. An actual FOC provides a date when the order will be completed and results in an order

for BellSouth to do work. BellSouth returns "dummy" FOCs in response to ALEC requests to cancel service requests before the service order is issued. The name "Dummy" FOC which creates a means to mischaracterize it, simply indicates that the ALEC is informed of the cancellation in the same way that an FOC is returned. These documents are returned simply as an acknowledgment to the ALEC that their request to cancel the order was received and are not associated with either a firm order confirmation or the issuance or cancellation of a service order. Because "dummy" FOCs are not firm order confirmations, they are properly excluded from the FOC Timeliness metric. However, BellSouth is willing to investigate the impact of including "dummy" FOCs in the FOC Timeliness measure.

Q. FINALLY, MS. NORRIS INDICATES ON PAGE 12 THAT THERE ARE REJECTIONS EXCLUDED FROM THE REJECT INTERVAL REPORT WHEN THE ISSUE DATE FALLS IN ONE MONTH AND THE REJECT DATE FALLS IN THE NEXT MONTH, AND THAT THIS IS A SO-CALLED "UNWARRANTED EXCLUSION." PLEASE EXPLAIN.

A. This is not an exclusion, but simply a difference in interpretation. The report is supposed to reflect orders rejected in a given month. Because rejects are returned so quickly, there are very few orders with rejects in different months. For example a special analysis for one month showed that the condition affected only one reject out of 79 total rejects. Consequent there is no reason to believe that the overall performance

would vary for the subset of transactions and there is no significant impact to the interval being recorded. Given the small impact and the questionable nature of capturing data outside the month, the additional coding to capture this data was not justified. Nonetheless, in response to AT&T, a change request to include these rejects is in the process of being worked by BellSouth and an update should be made with the publication of August results.

Q. ON PAGE 13 OF MS. NORRIS' TESTIMONY, AT&T CONTENDS THAT IN MAY 2001, 10% OF ITS LOCAL SERVICE REQUESTS (LSRS) DID NOT RECEIVE A FIRM ORDER CONFIRMATION (FOC) OR REJECT. PLEASE RESPOND.

A. Ms. Norris is incorrect. The FOC and Reject Response Completeness metric is a new metric that has only been available since the March 2001 data. BellSouth has already acknowledged that this measure is incorrect and asks the Commission not to rely upon it. Regarding resolution, BellSouth identified a data capture issue with this metric, which was corrected in April 2001. Specifically, particular classes of rejected service requests, auto clarifications, were not being picked up. However, further investigation and code modifications are required to report the results more accurately. Consequently, BellSouth does not rely on this measurement to evaluate performance at this time.

The purpose of the measure is to indicate whether all orders have been

accounted for in processing. The key point in BellSouth's investigation, however, is that BellSouth has not uncovered any evidence to indicate that orders are being lost. Indeed, while Ms. Norris implies, that she is "concerned", she does not allege (nor does BellSouth believe she can or should) that AT&T orders are being lost. Thus, while the metric itself is being refined, there is no evidence that BellSouth is losing orders.

Q. YOU HAVE MENTIONED FOC/REJECTION COMPLETENESS AND LNP DISCONNECT TIMELINESS AS UNRELIABLE, ARE THERE OTHER MEASURES THAT YOU WOULD LIKE TO ADDRESS?

A. Yes. Unlike FOC/Reject Completeness which understate BellSouth performance, one other measurement overstate performance. That measurement is Jeopardy Notice Interval (P-2). Currently, Jeopardy Notice Interval is calculated based on the order completion date instead of the original due date. Programming corrections are anticipated in October 2001, so the Commission should not rely on this measurement.

There are two other measurements, although they are useful, I would like to ensure that the Commission does not overrate BellSouth's performance by using them. P-9 Percent Provisioning Troubles in 30 days is overstated per a KPMG exception by about 0.1% (.001). Also, we have not yet moved the timestamps for OSS interfaces as defined in the OSS Response Interval Measure. Thus, the retail analog should be increased by 2 seconds. Any other known differences understates BellSouth's

performances.

Q. ON PAGE 13, MS. NORRIS ALSO MENTIONS THE IMPACT OF BELLSOUTH'S ALLEGED FAILURE TO INCLUDE AT&T'S DATA IN THE PERFORMANCE DATA AS A WHOLE. PLEASE RESPOND.

A. Ms. Norris draws an unwarranted and overbroad conclusion. BellSouth acknowledges that the FOC and Reject Completeness metric is incorrect. However, the Auto Clarifications that cause an error in the completeness measurement are in fact counted as Rejects, so the problem is limited to the FOC and Reject Completeness measure. Consequently Ms. Norris' inference that this issue affects other measures is clearly false.

Q. PLEASE ADDRESS MS. NORRIS' ASSERTION THAT STATEWIDE DATA IS AFFECTED WHENEVER PMAP DATA DOES NOT REFLECT DATA FOR A SPECIFIC ALEC.

A. This conclusion is completely false. One reason data may not appear for a ALEC in PMAP is because the system could not assign the data to that ALEC. Many times the ALEC is the cause of this problem by not providing appropriate data to BellSouth. Regardless of the reason data may not appear for a ALEC in PMAP, statewide aggregate reports include all data regardless of ALECK specific assignments. Consequently, as long as the data is anywhere in PMAP, the statewide reports are accurate.

Q. ON PAGE 14, MS. NORRIS NOTES THAT THE MAY 2001 DATA THAT BELLSOUTH PROVIDED TO AT&T EXCLUDED SOME OF AT&T BROADBAND'S PMAP PERFORMANCE REPORTS. WHY IS THIS?

A. AT&T Broadband's data is in the raw data files in PMAP; however, it was not correctly allocated to AT&T's ALEC-specific account. This is a clerical error that BellSouth will resolve. Once the change is made, BellSouth will be able to provide previous month's raw data files to AT&T upon request should they need them to validate their data. However, the statewide aggregate reports are accurate because the data was in PMAP and was therefore included.

Q. ON PAGE 16 OF HER TESTIMONY, MS. NORRIS STATES THAT BELLSOUTH REPORTS 47 PARTIALLY MECHANIZED REJECTIONS IN PMAP BUT ONLY 22 ORDERS FOR ALEC CAUSED FALLOUT IN THE FLOW-THROUGH REPORT. PLEASE RESPOND.

A. Ms. Norris' claim that Auto Clarification on the Flow-Through Report should match the Reject Report is incorrect. Ms. Norris uses as an example of data in January 2001, for OCN 7680 and claims that UNE-P numbers that should have been the same were different across the Reject Interval and Flow-Through reports. There are several reasons for this difference.

The first reason is that while the Reject Interval reports and the Flow-Through reports use the same source data, different business rules are used to process some of the results. In this case, 9 LSRs were included in the Reject Interval report under Partially Mechanized rejects, but because of classification differences related to the processing of the LSRs, these orders appear in the Total Manual Fallout category of the Flow-Through Report.

The second reason also has to do with differences in business rules. In this case, 12 LSRs were auto-clarified, then claimed (retrieved) by a LCSC service representative for further processing, causing them to be classified as partially mechanized and included in the count of Partially Mechanized Rejects. In the Flow-Through report, they are included in the Auto Clarification category because they are auto-clarified, and do not appear in the ALEC-Caused Fallout category.

The last reason for the difference is that 4 LSRs, supporting AT&T feature testing, were submitted via the TAG interface. These were submitted by BellSouth during production verification testing of a feature ("GENERATE LCC FOR AT&T IN 5E SWITCH ATLNGAPPDS2") that AT&T requested Through the Change Control process. This feature was requested by AT&T only, and therefore had to be tested with one of their OCNs since BellSouth's systems will only perform these special functions for AT&T orders. BellSouth canceled all orders so that AT&T would not be billed, however, being in the production environment, the ordering measures

were still impacted. It was critical that the full functionality be tested so that BellSouth could ensure that AT&T's request was correctly implemented.

Q. PLEASE RESPOND TO MS. NORRIS' NEXT ALLEGED DISCREPANCY ON PAGE 16, THAT THERE ARE 1,430 LSRS ON THE JANUARY 2001 FLOW-THROUGH REPORT AND ONLY 1,427 LSRS ON THE PERCENT REJECTED MECHANIZED REPORT IN PMAP.

A. There are two reasons why these results do not match. The first reason is that these measures reflect different types of orders. The % Reject Report from PMAP does not include LSRs identified as REQTYP 'JB' – Directory Listings orders in the % Rejected-Mechanized measure. REQTYP 'JB' identifies a Directory Listing LSR. Directory listings were not identified as a disaggregated category in the Interim SQM. Thus BellSouth appropriately did not disaggregate this data into a separate report. The LSRs are included, however, in the Flow-Through report. There were 24 such LSRs that appear in the Flow-Through report but not in % Rejects.

The second reason is that the base number of orders for % rejects included 21 LSRs submitted by BellSouth Through LENS and TAG on behalf of AT&T for a feature test. PMAP aggregates all LENS, TAG, and EDI LSRs, while the Flow-Through separately lists TAG and LENS LSRs, so these 21 orders are included in the reported total, and reflects two LENS submissions and 19 TAG submissions, which are the test orders.

The difference of 3 LSRs between the January 2001 Flow-Through report and the % Rejected-Mechanized report is the net of these two reasons. (Overstated by 24 additional Flow-Through LSRs due to the inclusion of Directory Listings and understated by 21 separately listed test LSRs on the Flow-Through report)

Q. ACCORDING TO MS. NORRIS' TESTIMONY ON PAGE 16, THERE ARE 35 FULLY MECHANIZED REJECTS ON THE % REJECTED-MECHANIZED REPORT AND 41 FULLY MECHANIZED REJECTS ON THE AUTO CLARIFICATIONS – FLOW-THROUGH REPORT. PLEASE ADDRESS.

A. Again, this is not an error and is due to the net of two different occurrences. The first reason is that, as mentioned earlier, the Rejected-Mechanized reports and the Flow-Through reports use the same data but separate code and business rules to process some of the results. In this case, 12 LSRs were included in the % Rejects report under Partially Mechanized rejects instead of Fully Mechanized rejects because they were auto clarified, and then retrieved by a service representative for further processing. The Flow-Through report uses slightly different business rules in the code, making these LSRs show up as Fully Mechanized Rejects.

The second reason for the difference is that the % Reject report included

six test LSRs submitted Through TAG Ms. Norris did not include these orders in her count of orders on the Flow-Through report. The reports require ALECs to have 'keys' assigned to them so that they can identify their records in the reports. Each ALEC interfaces and is identified by a separate key. These keys are randomly generated each month to insure that each ALEC's data is kept confidential. Ms. Norris failed to add the six LSRs from TAG to the 41Auto Clarification count that she picked up for LSRs submitted via EDI.

Q PLEASE RESPOND TO THE ALLEGED "DISCREPANCY" BETWEEN THE MISSED INSTALLATION APPOINTMENT (MIA) METRIC AND THE AVERAGE COMPLETION NOTICE INTERVAL (ACNI) METRIC THAT MS. NORRIS DISCUSSES ON PAGE 16.

A. Ms. Norris describes a difference in the number of completed orders listed in the MIA metric in January 2001 (1,154) as compared to the 877 completed orders in the ACNI raw data files. In January 2001, the ACNI calculation only included mechanized orders because these are the only order for which a notice of completion was provided. The MIA includes the total number of orders e.g. mechanized and non-mechanized completed in a given reporting period. With this difference in definition, AT&T should not expect the ACNI and MIA denominators to match. A surrogate method was established to reflect a completion notice for Non-mechanized orders in the ACNI reports with May 2001 results and partially mechanized orders have been included with June2001 data.

Q. ON PAGE 17 OF HER TESTIMONY, MS. NORRIS ASSERTS THAT "IN APRIL 2001, FOR OCN 7125 NON-LNP, BELLSOUTH REPORTED 76 AS THE NUMBER OF LSRS SUBMITTED IN THE PERCENT REJECTED LSR REPORT, BUT 460 IN THE FLOW-THROUGH REPORT" STATING THAT THESE NUMBERS SHOULD MATCH. CAN YOU EXPLAIN?

A. Yes. In April 2001, 384 of AT&T's LSRs were excluded from the % Rejects report because they were identified as project-managed service requests by AT&T. It is logical to exclude projects from the measure as it creates the same base between O-7, % Rejected LSR report and O-8, Reject Interval, which in turn facilitates comparisons, calculations, and verifications for the ALECs. As previously discussed KPMG has confirmed that AT&T sometimes misses the fact that they have designated certain orders as projects.

Q. ON PAGE 17, MS. NORRIS STATES "IN APRIL, AS WELL, FOR OCN 7125 NON-LNP, NUMBERS OF COMPLETED ORDERS APPEAR TO BE INCORRECT. THE NUMBER OF COMPLETED ORDERS IN THE MISSED APPOINTMENT METRIC WAS 1,288 WHEREAS BELLSOUTH REPORTS 5 COMPLETED ORDERS IN THE AVERAGE COMPLETION NOTICE INTERVAL RAW DATA FILES." THIS REPRESENTS A DISCREPANCY OF 1,283 ORDERS. CAN YOU EXPLAIN?

A. Yes. A surrogate process was created to represent a completion notice for non-mechanized and partial mechanized orders. The programming required to report non-mechanized orders in the ACNI metric was not completed until the May results production run and partially mechanized orders were not included in the original SQM and therefore were excluded from the reports. With these order types missing from April results, as noted in the published MSS, AT&T should not expect the ACNI and PMI denominators to match. The MIA data file count includes all completed orders: partially mechanized, fully mechanized, and non-mechanized.

Q. ON PAGE 18 OF HER TESTIMONY, MS. NORRIS STATES THAT THE APRIL 2001 FLOW-THROUGH REPORTS DISAGREE WITH EACH OTHER. CAN YOU EXPLAIN WHY THE PERCENT FLOW-THROUGH SERVICE REQUESTS DETAIL REPORT LISTS A BELLSOUTH CAUSED FALLOUT VOLUME OF 22,142 LSRS WHILE THE FLOW-THROUGH ERROR ANALYSIS REPORT ONLY IDENTIFIES 14,243 ERRORS IN APRIL 2001?

A. Yes. The purpose of the Flow-Through Error Analysis Report is to provide ALECs with examples of the most common reasons why orders fall out so that they can eliminate or minimize errors going forward. The analysis report is meant to reflect a significant percentage of relevant error codes, but does not provide a full accounting of BellSouth-caused errors. The report would be unnecessarily extensive and voluminous if every error

code were reflected as there are hundreds of codes with only 1-2 errors. Consequently, the Error Analysis report is truncated, whereas the Percent Flow-Through Service Requests (Detail) report reflects the comprehensive volume of errors. Nonetheless, change to the Flow-Through Error Analysis Report to report all errors is currently targeted for the publication of September 2001 results.

Q. ON PAGE 18 OF HER TESTIMONY, MS. NORRIS DISCUSSES THE REPOSTING OF MAY PERFORMANCE REPORTS AND ASSERTS THAT "PERFORMING ANY ANALYSIS ON BELLSOUTH'S MAY DATA HAS BEEN LIKE HITTING A MOVING TARGET." PLEASE RESPOND.

A. Ms. Norris overstates the degree of reposting. BellSouth made minor changes, requiring the reposting of only two metrics (FOC/REJ Completeness and ACNI). As previously stated the FOC/REJ completeness measure is unreliable anyway. BellSouth changed the yes/no response for three OSS measures due to a clerical error. This change had no impact on the data itself. Also Line Sharing Data for certain provisioning measures was originally omitted in May and reported later. The magnitude of changes when compared to the overall volume of metrics produced did not materially impact the ALECs' ability to review and/or use the performance data.

BellSouth minimizes the reposting of monthly performance results to reduce any confusion for the ALECs when they are trying to validate their

orders against BellSouth's records. The metrics and sub-metrics that BellSouth was ordered to produce for May results (in accordance with the implementation timeframe) are voluminous (over 2,200) and extremely complex. In fact, BellSouth was forced to pull up the schedule for the development and production of these metrics by three full months in order to comply with the order. As a result of the schedule, BellSouth was faced with a decision to post the results in a timely manner, despite a continuing validation results process, or delay the posting of results until full validation had been completed. Given our expectation that the changes would be minimal or nonexistent, BellSouth decided to give the ALECs the data as soon as possible.

The June 2001 MSS in Georgia was reposted to add of line sharing provisioning data and the recalculation (affected four charts) of the retail analog "ADSL to Retail."

Q. ON PAGE 20 OF HER TESTIMONY, MS. NORRIS CLAIMS THAT THE MAY, 2001 DATA FOR TWO DIFFERENT TYPES OF PRODUCT DISAGGREGATIONS, LOOP/PORT COMBINATIONS AND THE UNE/OTHER NON-DESIGN, ARE IDENTICAL FOR THE FOLLOWING MEASURES: % REJECTED SERVICE REQUESTS, REJECT INTERVAL, FOC TIMELINESS, FOC AND REJECT RESPONSE COMPLETENESS. PLEASE DISCUSS.

A. The numbers represent the same orders, but this situation is

inconsequential. The Loop/Port Combo and Other Non-Design product aggregations for ordering measures contain one common product, Combos – Loop + Port. Of all of the products that are rolled into these two product aggregations, the only one that had data on this particular MSS (GA May 2001) was Combos – Loop + Port (Ordering). Consequently, the two product aggregations had the same volume across the ordering metrics. With July data, Loop + Port Combos will be removed from the Other Non-Design category.

Q. ON PAGE 21 OF HER TESTIMONY, MS. NORRIS CLAIMS THAT IN THE MAY MSS, BELLSOUTH REPORTS VOLUMES FOR NON-DISPATCH LOOP-PORT COMBOS OF 16,465 IN THE MISSED INSTALLATION APPOINTMENT (MIA) AND 9,402 IN THE COMBINED MECHANIZED AND NON-MECHANIZED COMPLETION NOTICE NON-DISPATCH METRICS. IS THIS CORRECT?

A. As previously stated, partial mechanized orders were not included in the Completion Notice Measure until June, 2001 data. This fact is clearly indicated on the MSS.

Q. ON PAGE 21 OF HER TESTIMONY, MS NORRIS STATES THAT THE % REJECTED SERVICE REQUEST, FOC/REJECT COMPLETENESS, AND FOC/REJECT MULTIPLE RESPONSE COMPLETENESS MEASURES ALL USE THE SAME DENOMINATOR, THE NUMBER OF

LSRS RECEIVED, BUT DATA FREQUENTLY REVEALS THAT THIS IS NOT THE CASE. HOW DO YOU RESPOND?

A. The business rules do not indicate that the denominator for these measures should be the same. The denominator for FOC/Reject Completeness is total LSRs and for FOC/Reject Multiple Response the denominator is the numerator for FOC/Reject Completeness.

Q. ON PAGE 22 OF HER TESTIMONY, MS. NORRIS STATES THAT BELLSOUTH'S REPORT FOR LOOP MAKE-UP RESPONSE TIME – ELECTRONIC REPORTS THAT 100% OF THE RESPONSES WERE RETURNED IN UNDER 5 MINUTES BUT ALSO THAT THE AVERAGE RESPONSE INTERVAL WAS 16 MINUTES AND 85 SECONDS. PLEASE EXPLAIN THE DISCREPANCY.

A. The report in question was not clearly formatted and has been adjusted for the June data. In fact, the Average Interval column should have read (min:sec.hundredths of a second) in the header and the data within the column, in this case, should read 0:16.85. That is, BellSouth's systems were responding within the required time of less than one minute. Specifically, they were responding in 16.85 seconds in Georgia and in 16 seconds for the region.

Q. ON PAGES 22-23, MS. NORRIS DISPUTES THE FACT THAT IN JANUARY 2001, ACCORDING TO THE % UNE FLOW-THROUGH

DETAIL SECTION OF THE FLOW-THROUGH REPORT, AT&T WAS SHOWN TO HAVE 19 LSRS SUBMITTED THROUGH TAG AND THAT IN APRIL 2001, 3 ORDERS WERE ATTRIBUTED TO AT&T THROUGH TAG. SHE ARGUES THAT THIS CANNOT BE CORRECT SINCE AT&T DOES NOT OPERATE A TAG INTERFACE WITH BELLSOUTH. CAN YOU EXPLAIN THESE ORDERS?

A. Yes. The January TAG orders were submitted by BellSouth during production verification testing of a feature ("GENERATE LCC FOR AT&T IN 5E SWITCH ATLNGAPPDS2") that AT&T requested Through the Change Control process. This feature was requested by AT&T only, and therefore had to be tested with one of their OCNs since BellSouth's systems will only perform these special functions for AT&T orders. BellSouth canceled all orders so that AT&T would not be billed, however, being in the production environment, the ordering measures were still impacted. It was critical that the full functionality be tested so that BellSouth could ensure that AT&T's request was correctly implemented. It should also be noted, that BellSouth has done even further investigation into the source of these orders, and while 17 were attributed directly to our internal testing of AT&T's requested feature, the last two submitted orders came from AT&T as a test for UNE-P orders on January 9, 2001.

In April 2001, the three orders of which Ms. Norris is speaking were submitted by KPMG in Florida, for the Florida Third Party test, in relation to collaborative testing. KPMG presumably obtained AT&T's consent

along with the information required to place the orders in production, including the active OCN 7680.

Q. CAN YOU ALSO EXPLAIN WHY IN MAY 2001, "HUNDREDS OF ACKNOWLEDGEMENTS" WERE SENT TO AT&T VIA TAG?

A. The "hundreds of acknowledgements" that Ms. Norris is speaking of in May 2001 data are orders sent by AT&T Through their LENS interface. The LENS architecture design is such that many pre-order queries and all LSRs are sent to BellSouth's backend legacy systems via TAG, which then returns an acknowledgement back to LENS. These acknowledgements are identified as originating from TAG, even though the ALEC interface utilized was LENS. BellSouth has confirmed that the data in the May 2001 PMAP Acknowledgment Message Timeliness report is accurate.

Q. ON PAGE 24 OF HER TESTIMONY, MS. NORRIS SAYS THAT BELLSOUTH HAS BEEN EXCLUDING PARTIALLY MECHANIZED ORDERS FROM THE AVERAGE COMPLETION NOTICE INTERVAL MEASURE AND FROM PMAP RAW DATA. WHY IS THIS?

A. As previously discussed, prior to May data, ACNI reflected Mechanized orders only, consistent with prior SQMs. This was because until May, the C-SOTS completion notices were faxed to the ALECs and that was too labor intensive to measure. The Georgia Commission ordered BellSouth

to remove the exclusion for Non-Mechanized orders, which also included Partially Mechanized orders. With the May data we established a surrogate for a completion notice to permit us to report ACNI separately for Non-Mechanized orders while partially mechanized orders will be added in June.

Q. ON PAGE 25 OF HER TESTIMONY, MS. NORRIS CITES ALLEGED INCONSISTENCIES IN AT&T'S IDENTIFICATION OF WHAT DATA IS EXCLUDED FROM PMAP, IMPLYING THAT THERE IS SOME UNSTATED PROBLEM WITH BELLSOUTH'S DATA. PLEASE RESPOND.

A. Specifically, Ms. Norris points to BellSouth's responses to Interrogatories 12 and 58 from this Commission's Docket No. 000121-TP and suggests that they are inconsistent. Actually, the two responses are not inconsistent because the interrogatories are asking different questions. In Interrogatory 12 (SEN-15), BellSouth's response identified the exclusions listed in the Interim SQM. This interrogatory is asking for the exclusions that must be applied to the associated raw data file to create the report. The response provides a chart that lists the Raw Data files that BellSouth provides and the transactions that must be excluded, as stated in the Interim SQM, from the calculations to replicate the measurement.

Interrogatory 58 requests BellSouth to provide a listing of any Interim SQM exclusion where the associated transactional data is not listed in the

Raw Data Users Guide. The Raw Data User Guide located within the Help selection on the PMAP website provides detailed instructions for the ALEC to replicate the monthly reports utilizing the raw data. The only such data identified was cancelled orders for the Average Order Completion Interval (OCI) reports and the ACNI reports. The remaining raw data files contain all pertinent data for each measurement and must have the exclusions performed manually to recreate the report. Contrary to Ms. Norris' assertion, there is no inconsistency between the answers to interrogatories 12 and 58. In any event it is very easy for AT&T to determine whether an LSR is included in PMAP results. If the LSR appears in raw data it is included. If the LSR doesn't appear it is excluded.

Q. ON PAGE 25 OF HER TESTIMONY, MS. NORRIS CLAIMS THAT DATA MAY BE UNINTENTIONALLY EXCLUDED FROM PMAP IN ADDITION TO THE EXCLUSIONS LISTED IN THE INTERIM SQM AND THE RAW DATA USERS MANUAL.

A. As I have already discussed, BellSouth has extensive validation procedures, both in its systems themselves and manual procedures, to ensure that any anomalies in the data production process are identified and remedied. Thus, while BellSouth certainly cannot promise that computer errors will never occur, BellSouth has taken extensive measures to minimize such errors and they typically have no impact on the Commission's ability to evaluate BellSouth's performance. I have previously described the data validation processes. When errors occur,

the BellSouth processes are designed to identify and resolve them quickly.

Q. PLEASE ADDRESS MS. NORRIS' ASSERTIONS REGARDING FINDINGS BY KPMG ON PAGE 25.

A. Ms. Norris attempts to use a KPMG finding that certain data had been excluded from PMAP due to server capacity constraints as a basis for claiming that BellSouth improperly excludes other data. The KPMG finding does not support her conclusion. This issue concerned the lack of response data for several days in the raw data file rather than the exclusion of data. In the Georgia third-party OSS test, KPMG issued Exception 92, concerning the lack of response data from the TAG system for several days. Specifically, the raw data file used to calculate the *Average OSS Response Time and Response Interval* did not contain response data from the TAG system for 10/06/1999, 10/24/1999, 10/25/1999, 10/28/1999, 01/16/2000, and 1/31/2000.

In response to the Exception, BellSouth found that two of the dates listed above (10/24/1999 and 01/16/2000) were Sundays. On these weekend days, no activity occurred on the TAG server, and thus there is no OSS Response data to report. On the other dates (10/06/1999, 10/25/1999, 10/28/1999, and 01/31/2000) the TAG server failed to send a data file. All data feeds generated by the TAG server are placed in a temporary directory. On these dates the directory filled up, and the data feeds failed

since there was no room to write the data files. By the time the situation was discovered it was too late to regenerate the previous day's data.

As a corrective measure, the controller of the TAG data feed moved processing of the data to a new directory, which contained over 4 gigabytes of free space, eliminating the issue of capacity on the TAG server. As you can see, the issue Ms. Norris refers to was resolved over a year ago (February 2000) as part of the KPMG test.

BellSouth's corrective measure satisfied KPMG's concern that the raw data used in the calculation of the measurement *(Average OSS Response Time and Response Interval)* is now accurately supported by the component early stage data.

Q. ON PAGES 26-27 OF HER TESTIMONY, MS. NORRIS SAYS THAT THE REVIEW OF THE PROVIDED LNP RAW DATA FOR ONE MEASURE DETERMINED THAT 406 PONS WERE MISSING FROM BELLSOUTH'S MAY 2001 RAW DATA. PLEASE RESPOND?

A. Of the 406 missing PONS that AT&T identified in the LNP FOC Timeliness report, all but 5 were excluded because AT&T classified them as "projects" which are properly excluded in accordance with the SQM. Once again, AT&T does not recognize the fact that they classified some orders as projects. The remaining 5 PONs that are not classified as project-managed were excluded due to one of the following reasons: mismatches

in the LON table (3 PONs), order type (1 PON had two orders issued, an 'N' and a 'D', both of which were excluded for REQTYP 'C' since they are directory listing and disconnect orders only), and request type (1 PON was clarified twice and then cancelled). As you can see, more of the PONs are missing.

Q. ON PAGE 27 OF MS. NORRIS' TESTIMONY, AT&T CLAIMS THAT IT CANNOT VALIDATE BILLLING MEASURES. IS THIS CORRECT?

A. No. Billing measures are derived from the ALEC's bills that are sent to ALEC's monthly, not from PMAP. Thus ALECs have access to the underlying data right now. Again, these measures were developed outside of PMAP to expedite measurement production for the ALECs. The data used in calculating the performance measurements is the data from monthly bills and was not initially planned to be in PMAP. Like the issue with LNP, AT&T has been advised that the raw billing data would be in PMAP by the end of the year. However, the raw data for the billing metrics is now available with publication of June 2001 results.

COVAD WITNESS - COLETTE DAVIS

Q. MS. DAVIS STATES ON PAGE 6 OF HER TESTIMONY THAT BELLSOUTH'S APRIL PERFORMANCE DATA INDICATES THAT ALECS EXPERIENCE 20% REPEAT TROUBLES WITHIN 30 DAYS FOR

NON-DISPATCH AND 9% FOR DISPATCH FOR STAND ALONE LOOPS. PLEASE RESPOND?

A. While Ms. Davis appears to be describing results in Georgia, her description of the impact of the data is misleading. Nonetheless, the more important point is that she omits the fact that BellSouth met the performance standard for repeat troubles on UDC. The retail analog for this measure is the performance for BellSouth ISDN retail customers. So COVAD received service comparable to retail.

Q. PLEASE ADDRESS MS. DAVIS OPINIONS AS STATED ON PAGE 10 OF HOW BELLSOUTHS' PERFORMANCE SHOULD BE MEASURED.

A. First, Ms. Davis claims that the best way to evaluate BellSouth's performance is to compare it to the performance indicated by COVADs internal data. Clearly, BellSouth serves ALECs other than COVAD. Consequently this is a more appropriate performance for the aggregate of all ALECs which is provided by the Monthly State Summary (MSS). Further, this internal data that COVAD proposes is undefined, solely controlled by COVAD and not subject to review by anyone. Such data can hardly be useful to the Commission. Also, contrary to Ms. Davis' claim BellSouth was not obligated to produce the May MSS by June 30. Ms. Davis uses her incorrect conclusion as a basis for claiming that BellSouth's data is insufficient. Again, however she is referring to Georgia

where her complaint is not with BellSouth but a criticism of the Georgia Commission.

In April 2001 BellSouth was not obligated to provide ALEC specific data for any of the categories Ms. Davis identified. That obligation became effective on June 30th, 2001 and was limited to Georgia as the Georgia Commission ordered. Her snide inferences about BellSouth's motives are unnecessary, particularly given the fact that she is misstating our obligations.

Q. PLEASE ADDRESS MS. DAVIS' ASSERTIONS REGARDING THE REASONABLENESS OF THE "ADSL PROVIDED TO RETAIL" ANALOG.

A. Ms. Davis appears to dislike the analog that the Commission ordered. First, BellSouth is not required to disaggregate between business and residential ADSL offerings. The Florida Commission approved the use of the "ADSL Provided to Retail" analog for purposes of the Third Party Test, and the staff recommended the same analog in the Permanent Performance Measures Docket. Turning to the accuracy of her claims, she makes a number of incorrect assertions. Her claim about the relative frequency of dispatch on business versus residence retail ADSL, even in it was true, is irrelevant. In the next paragraph she claims it is not clear how BellSouth calculated the interval, but, in the next sentence, precisely describes how the interval is calculated.

Covad's criticism of the OCI definition is replete with errors. First, if a dispatch is required, BellSouth will dispatch to the customer's premise to provide the same technical work for either COVAD or retail line sharing. Next, few if any residential customers would have a router, and filters added, not removed.

The more significant point is that COVAD continues to claim incorrectly that no definitive completion date exists for retail self installations. BellSouth completes the retail order when the line is determined to be available to support ADSL service. It is irrelevant when the customer installs the self-install kit. Ms. Davis offers nothing to refute the validity of this statement. Consequently her sarcastic remark that the retail OCI is a "best guess" is based on nothing more than a host of misstatements. Further, she has not demonstrated any problems in how ADSL data is captured to support her opinion regarding the OCI metric.

Q. ON PAGES 13-14 OF HER TESTIMONY, MS. DAVIS STATED THAT IN APRIL 2001 THE PERCENT ORDERS IN JEOPARDY – NON-MECHANIZED MEASUREMENT FOR XDSL AND UNE ISDN SHOW THAT ALECS FACE A HUGE NUMBER OF PROBLEMS AND THAT ALEC ORDERS ARE PLACED INTO JEOPARDY FAR MORE OFTEN THAN BELLSOUTH ORDERS. DO YOU AGREE?

A. No. Ms. Davis misinterprets what percent orders in jeopardy and a jeopardy notice means. A jeopardy notice indicates whether a facility

problem has been identified which could affect the timeliness of completing the order. It does not indicate whether the ALECs installation date was or will be in fact missed. In reality, for most of these orders, the jeopardies are cleared and the due date is met.

In Florida BellSouth met the performance standards for this measurement. BellSouth's performance in that regard is captured by the Percent Missed Installation Appointments measure.

Q. MS. DAVIS CLAIM THAT THE PERCENT PROVISIONING TROUBLES WITHIN 30 DAYS MEASURE SHOWS THAT ALECS EXPERIENCE SIGNIFICANTLY MORE PROBLEMS WITH THE QUALITY OF BELLSOUTH'S NETWORK ELEMENTS THAN DO BELLSOUTH'S OWN RETAIL CUSTOMERS, SPECIFICALLY FOR XDSL-DISPATCH AND ISDN-DISPATCH. IS THIS CORRECT?

A. No. In April retail troubles were not captured for the retail analog so retail performance is incorrectly overstated. The retail troubles were correctly stated in May, 2001 and, BellSouth is in parity for both products in May 2001.

Q. MS. DAVIS OPINES THAT BELLSOUTH'S REPORT OF 0% MISSED INSTALLATION APPOINTMENTS FOR LINE SHARED LOOPS PROVIDED TO ALECS IN FLORIDA FOR APRIL 2001 IS INCORRECT BASED ON BELLSOUTH'S ACCURACY OF ITS SERVICE ORDER

COMPLETION FOR LINE SHARED LOOPS. IS THE 0% MISSED INSTALLATION APPOINTMENTS ACCURATE?

A. Yes. There were only 63 orders (compared to 18,256 for BellSouth) in this category and the majority of the orders (62 out of 63) for April were Non-dispatch. Generally non-dispatch orders in this category will have a low if not 0 percent missed appointment rate. Given the low volume and type of orders, a 0% missed appointment metric is reasonable. Again Ms. Davis makes a baseless claim about phantom "problems" with order completions. And her discussions about auto completions has no impact on whether performance is discriminatory.

Q. PLEASE ADDRESS MS. DAVIS CONCLUSIONS REGARDING CUSTOMER TROUBLE REPORT RATE (M&R 2)?

A. Ms. Davis only tells part of the story. For Non-Dispatch troubles BellSouth met the performance standard. Ms. Davis only gave the results for Dispatched troubles. And even those results show a small disparity. Another area Ms. Davis ignores is the impact of reports where no trouble was found. For example, in May 2001 data, there was a total of 12 misses out of 747 in the service base. 10 of the 12 troubles were closed because no trouble was found.

Q. MS. DAVIS STATES THAT THE M&R-4 REPORT ON PERCENT REPEAT TROUBLES WITHIN 30 DAYS SHOWS THAT BELLSOUTH

PROVIDES BETTER SERVICE TO ITS RETAIL CUSTOMERS THAN TO ALECS SPECIFICALLY FOR XDSL LOOPS-DISPATCH AND NON-DISPATCH, ISDN–DISPATCH AND LINE SHARED LOOPS-NON-DISPATCH. IS THIS TRUE?

A. No. M&R-4: Percent Repeat Troubles within 30 days for xDSL Loops-Dispatch and Non-Dispatch and ISDN-Dispatch are all in parity with Retail for March, April, and May 2001. The data for Line Sharing is inconclusive because the volume of orders is too small to make a valid comparison (4 for Non-Dispatch and 21 for Dispatches).

Q. MS. DAVIS STATES ON PAGE 17 OF HER TESTIMONY THAT BELLSOUTH FAILED TO MEET THE BENCHMARK OF 95% FOR LOOP MAKE-UP (PO-1) IN APRIL 2001. WHAT PERCENTAGE OF ORDERS DID BELLSOUTH MEET?

A. BellSouth's performance for PO-1: Loop Make-Up within 3 business days, was just slightly below the required benchmark of 95% and does not indicate a systemic problem. The following months, May and June 2001, BellSouth was in fact in parity. Also for the electronic measurement, which accounts for a far larger volume of orders, BellSouth met the standard in each of the three months.

KMC WITNESSES – MARIO ESPIN AND JIM SFAKIANOS

Q. ON PAGE 4 OF HIS TESTIMONY, MR. ESPIN ADDRESSED INSTALLATION APPOINTMENTS AS DOES MR. SFAKIANOS ON PAGE 6 FOR KMC IN DAYTONA BEACH. HOW DO YOU RESPOND?

A. KMC does not provide detailed information to support these claims and BellSouth does not currently track this data at the MSA level. Our internal records show that in Florida, for the months of January to June, KMC's results for Missed Installation Appointments caused by BellSouth across all product areas are as follows, 9.58%, 11.81%, 4.12%, 8.19%, 5.57%, and 1.76%. First of all, these numbers are much lower than the numbers self reported by KMC for the Daytona Beach MSA. The average percentage of Missed Installation Appointments that were caused by BellSouth from January Through June 2001 was only 6.48%. For the month of May in Florida BellSouth was in parity for 16 out of 19 Resale Products and 23 out of 25 UNE Products for the % Missed Installation Appointments Measure. Furthermore, the Missed Installation Appointments caused by BellSouth were much lower than the end user misses by KMC.

Q. ON PAGE 9 OF MR. ESPIN'S TESTIMONY AND PAGE 3 OF MR. SFAKIANOS' TESTIMONY, KMC STATES THAT FOR THE MONTH OF APRIL 8% OF THE CIRCUITS THAT BELLSOUTH INSTALLED FOR KMC HAD TROUBLES WITHIN 30 DAYS OF THE INSTALLATION. WOULD YOU COMMENT ON THIS?

A. The April 2001 numbers that KMC discusses for DS1 lines are basically correct, but do not indicate systemic substandard performance. For the % Provisioning Troubles within 30 Days Metric in Florida, of the products that are ordered by KMC that have volumes for April and May 2001, BellSouth was in parity for 9 out of 13 Products for April and 10 out of 13 Products for May 2001. These figures do not support Mr. Espin's claim of serious outage problems

Q. ON PAGE 9 OF MR. ESPIN'S TESTIMONY AND PAGE 4 OF MR. SFAKIANOS' TESTIMONY, THEY CONCLUDE THAT BELLSOUTH DOES NOT COMPLETE REPAIRS PROPERLY. PLEASE RESPOND.

A. The % Repeat Troubles within 30 days measure improved 4.81% for all products in May, and for both April and May these figures were in parity with BellSouth retail. Consequently no indication of disparate treatment is indicated.

NEW SOUTH WITNESS - JOHN FURY

Q. ON PAGE 14 OF HIS TESTIMONY, MR. FURY STATES THAT NEW SOUTH HAS GENERAL CONCERNS REGARDING DELAY IN DELIVERY OF FOCS, EXCESSIVE NUMBER OF ORDERS IN JEOPARDY, EXCESSIVE MISSED APPOINTMENTS, AND MULTIPLE PROVISIONING PROBLEMS. HOW DO YOU RESPOND TO THESE CONCERNS?

A. Mr. Fury does not give any specifics about the general observations he makes. He states that NewSouth will more fully address these issues in the workshop/comment phase of the 3rd Party Test. BellSouth would be glad to investigate further Mr. Fury's and NewSouth's concerns if they will provide the information identifying occurrences. Such unsupported generalized statements provide no basis to assess BellSouth's performance.

In regards to the four measures that Mr. Fury briefly mentions, in Florida for the month of May, BellSouth was in Parity for FOC Timeliness for all Mechanized Resale Products and 8 out of 11 Mechanized UNE Products. BellSouth was in parity for all Resale and 11 out of 13 UNE products for % Jeopardies Mechanized Orders Metric. Additionally, BellSouth was in Parity for 16 out of 19 Resale and 23 out of 25 UNE Products for the % Missed Installation Appointments Measure. Finally, for the % Provisioning Troubles within 30 Days measure in May BellSouth was in parity for 12 out of 15 Resale Products and 18 out of 22 UNE Products. Consequently the data does not support Mr. Fury's extreme claims of performance deficiencies.

NUVOX WITNESS - MS. MARY CAMPBELL

Q. IN MS. CAMPBELL'S TESTIMONY SHE ALLEGES PROBLEMS THAT NUVOX HAD OBTAINING ALEC-SPECIFIC METRICS RESULTS AND REGIONAL FLOW-THROUGH REPORTS FROM BELLSOUTH. CAN

YOU ADDRESS THESE ISSUES?

A. Yes. NuVox's original predecessor is State Communications, which became TriVergent Communications in 2000. Gabriel Communications and TriVergent Communications merged in November 2000 and chose the new company name of NuVox in February 2001. At this time BellSouth has multiple contracts for the various individual companies, which now comprise NuVox and has not been formally notified regarding NuVox's desire to consolidate the reporting structure following its recent merger and acquisition activity. BellSouth has an individual contract with TriVergent, which was previously known as StateComm, and an additional contract with Gabriel Communications only for the state of Kentucky.

Having gone through a series of mergers and acquisitions, NuVox's combination of predecessor companies include at least seven OCNs and currently have multiple wholesale customer IDs. The OCNs used by each company must be mapped to the same wholesale customer id to view the raw data under a single user id on the PMAP website. As NuVox knows, they have to advise BellSouth of their desire to consolidate data and provide the necessary information. However, NuVox has not done so.

Additionally, each individual OCN requires a separate key to read the Flow-Through reports. In the case of NuVox that was recently involved in merger and acquisition activity, the process for updating the databases required to report all OCNs under a single wholesale customer id has not

been completed, resulting in NuVox's inability to view all of its data using a single PMAP website user ID. Having had this recently brought to our attention by NuVox, we are now working to correct the problem. This includes:

1) Placing all seven NuVox OCNs (8672, 2505, 2506, 2620, 2621, 3799, and 4890) under one WHOLESALE CUSTOMER ID to allow viewing of all NuVox data on the PMAP Website through a single user id. Had NuVox requested the consolidation, BellSouth would have done this before now,

2) Since NuVox has finally identified their OCN's, BellSouth is providing NuVox with all keys required to read the Flow-Through Reports for all NuVox OCNs.

Q. ON PAGES 3-4 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT NUVOX WAS GIVEN ONE USER IDENTIFICATION AND PASSWORD TO ACCESS NUVOX'S DATA. SHE WAS TOLD THAT ALL RELEVANT OCNS (8672, 2505 AND 2620) WOULD BE LISTED UNDER STATECOMM, HOWEVER ONLY ONE OCN (8672) WAS LISTED. PLEASE ADDRESS?

A. NuVox only requested one User ID and there apparently was a misunderstanding regarding what she was told. BellSouth did not know that these other OCNs applied to StateComm and could not have told Ms. Campbell that they were all reflected. Because NuVox now has several

OCNs coming from what was originally three separate companies (StateComm, TriVergent, and Gabriel), all OCNs need to be under one Wholesale Customer ID to have each OCNs information available to be viewed under one PMAP user id, in this case, STATECOMM. However, NuVox has not yet requested these OCN-to-Wholesale Customer ID links and, as a result, NuVox only sees the raw data for one of the seven OCNs, 8672. The PMAP results reports in fact do contain all active NuVox OCNs (8672 & 2505) with data. We expect to fix this problem to enable NuVox to see all relevant PMAP raw data for July data.

Additionally, StateComm OCN 2620 appears to be a specialty account in BellSouth's ALEC database because there is no signed contract with StateComm for that particular OCN. NuVox's recent merger and acquisition activity has resulted in a number of questions for BellSouth on the reporting consolidation and preferences for NuVox. BellSouth is currently working to resolve these issues with NuVox.

Q. ON PAGE 4, MS. CAMPBELL ALLEGES A DISCREPANCY BETWEEN THE VOLUME OF LSRS THEY SUBMITTED IN APRIL 2001 VS THE NUMBER OF LSRS SHOWING IN NUVOX'S RECORDS. SPECIFICALLY, BELLSOUTH'S COUNT IN APRIL IS 1,942 AND NUVOX SAYS THEY SUBMITTED 616. PLEASE ADDRESS?

A. The 1,942 LSRs reported by BellSouth for NuVox are under OCN 8672, StateComm. This does not include the 35 LSRS for TriVergent, OCN

2505. NuVox, only requested the key for OCN 2505. They did not request the Flow-Through Key for StateComm, so BellSouth did not know that it should provide NuVox with that key. Without the key for OCN 8672, NuVox would not have been able to accurately view that data at the time. If NuVox alleges further LSR volume discrepancies on the 1,942 LSRs for OCN 8672 and 35 LSRs for OCN 2505, additional verification will be required. The PONs for the 616 LSRs stated by NuVox would be required to conduct any further investigation. Unfortunately, NuVox did not provide the listing of PONs from their internal records for the 616 LSRs to permit such investigation.

Q. ON PAGE 5 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT NONE OF NUVOX'S PONS WERE FOUND IN BELLSOUTH'S RAW DATA FILES FOR O-7 PERCENT REJECTED SERVICE REQUESTS FOR APRIL 2001. PLEASE EXPLAIN.

A. StateComm (OCN 8672) and TriVergent (OCN 2505) currently do not have the same Wholesale Customer ID allowing the two companies to be linked in the BellSouth database. As a result, Ms. Campbell would not have the ability to view any PONs for OCN 2505 (TriVergent) in raw data if she was logged into the PMAP website using her STATECOMM user id and password as she stated in her testimony on page 2. Although NuVox is unable to view both StateComm and TriVergent's raw data, NuVox is able to view the PMAP reports in PMAP for both StateComm (OCN 8672) and TriVergent (OCN 2505) since PMAP results reports do not require

that multiple OCNs have the same Wholesale Customer ID.

According to BellSouth's raw data files for O-7: Percent Rejected Service Requests for April 2001, NuVox did in fact have PONs for both TriVergent (OCN 2505) and StateComm (OCN 8672).

Q. ON PAGE 4 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT NUVOX IS NOT GETTING A COMPLETE SET OF KEYS SO THAT THEY ARE ABLE TO LOOK UP ALL RELATED DATA IN THE FLOW-THROUGH REPORT. WHY IS THIS?

A. BellSouth accurately provided Ms. Campbell with the Flow-Through Report key for the company that she requested, TriVergent (OCN 2505). Ms. Campbell failed to request the Flow-Through Report Key for StateComm (OCN 8672). For the April 2001 Flow-Through Report, BellSouth only provided NuVox with the TriVergent (OCN 2505) key as Ms. Campbell requested. For security reasons, BellSouth only distributes Flow-Through Report keys when the key is requested by the ALEC. Keys are distributed based on the specific OCNs requested by the ALEC. Without the request for a Flow-Through Report Key for OCN 8672 from Ms. Campbell, she would not have been able to view all of NuVox's data. There were no Flow-Through Report keys or data for Gabriel Communications or other OCNs for StateComm in April 2001. Again, the merger and acquisition activity surrounding NuVox and the specific nature of Ms. Campbell's request has prevented NuVox from receiving all

relevant data.

Q. ON PAGE 4 OF HER TESTIMONY, MS. CAMPBELL NOTES THAT ALL DATA ON THE PMAP WEBSITE IS IDENTIFIED AS STATECOMM 8672. IS THIS CORRECT?

A. No. Ms. Campbell is mistaken. In the PMAP results reports, NuVox's data appears under the name "STATECOMM" for two OCNS – StateComm (OCN 8672) and TriVergent (OCN 2505). Ms. Campbell must be referring to the raw data on the PMAP website which only contains StateComm (OCN 8672). As previously discussed, the Wholesale Customer IDs are not linked for all NuVox OCNs causing NuVox to only view OCN 8672 in the raw data on the PMAP Website. Had NuVox informed BellSouth on the specific OCNs that should be consolidated for ALEC reporting purposes based on the recent merger and acquisition. BellSouth would have updated the necessary databases to reflect the changes and enable NuVox to view all of their data.

Q. ON PAGES 5-6 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT THE FLOW-THROUGH REPORT FOR APRIL 2001 WAS INCOMPLETE, REFLECTING ONLY A FRACTION OF THE ORDERS SUBMITTED BY NUVOX AND NONE OF THE ORDERS FOR UNES AND RELATED SERVICES SUBMITTED UNDER OCN 2505 WERE INCLUDED. PLEASE EXPLAIN.

A. Once again, this problem was cause by NuVox actions regarding OCN's. The April 2001 Flow-Through Report is complete and contains all orders submitted by NuVox, under OCN 2505 including UNEs. BellSouth provided NuVox with the April Flow-Through keys for OCN 2505 (TriVergent) on June 20, 2001, as they requested, and the UNE orders are appropriately reflected in this report. TriVergent OCN 2505 submitted a total of 35 UNE LSRs via BellSouth's electronic interfaces in April. NuVox did not request the key for OCN 8672, StateComm, which had 1,942 LSRs submitted under that particular OCN. Without Flow-Through Report Keys for OCN 2505 and 8672, NuVox would not have been able to view all of the orders they submitted.

Q. ON PAGE 6, MS. CAMPBELL CLAIMS THAT BELLSOUTH TOLD NUVOX THERE WERE NO PMAP REPORTS SHOWING OCN 2505 IN APRIL 2001. WHY IS THIS?

A. BellSouth cannot pull up prior ALEC specific PMAP website screens once new data is posted. Data for OCN 2505 (TriVergent) did appear under the name "STATECOMM" in the May 2001 PMAP Results Reports. If there was a previous problem, it has now been corrected.

Q. ON PAGE 6 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT THE PMAP REPORTS ONLY INCLUDE DATA ON NUVOX'S RESALE BUSINESS. PLEASE EXPLAIN.

A. Ms. Campbell is wrong. The BellSouth PMAP reports do include all aspects of NuVox's business. As a result of NuVox's recent merger and acquisitions and having multiple OCNs that are currently not linked, the raw data on the PMAP website only displays data under OCN 8672, StateComm. Since NuVox's UNE and LNP business all falls under OCN 2505 (TriVergent) and not OCN 8672, NuVox would not be able to currently view this data in the raw data found on the PMAP website under their current User ID because OCN 2505 is not currently linked to StateComm. NuVox should inform BellSouth on the specific OCNs that should be consolidated for ALEC reporting purposes based on the recent merger and acquisition. BellSouth would then have the ability to update the necessary databases to reflect the changes and enable NuVox to view all of their raw data on the PMAP website.

Q. ON PAGES 7-8, MS. CAMPBELL ASSERTS THAT THERE IS A DISCREPANCY BETWEEN NUVOX'S EDI INTERFACE RECORDS OF 3180 LSRS, BELLSOUTH'S SERVICE ORDER REPORT THAT INCLUDED 250 NUVOX LSRS SUBMITTED VIA EDI AND BELLSOUTH'S MISCELLANEOUS AGGREGATE % FLOW-THROUGH DETAIL REPORT OF 254 NUVOX LSRS FOR MAY 2001. CAN YOU PLEASE EXPLAIN THIS?

A. Yes. Although Ms. Campbell's question is somewhat unclear, I believe she has inappropriately limited her search for NuVox PONs in BellSouth's Flow-Through reports and raw data files. First, let's address the NuVox

LSRs in BellSouth Miscellaneous Aggregate % Flow-Through Detail Report. By screening across three NuVox OCNs (2505, 8672, 4890), all three mechanized interfaces, and both the LNP and non-LNP Flow-Through reports, BellSouth identified 253 non-LNP LSRs and 667 LNP LSRs submitted via EDI, 2,158 non-LNP LSRs submitted via LENS, and 2 non-LNP LSRs submitted via TAG. This is a total of 3,080 valid NuVox LSRs processed by BellSouth in the month of May. Ms. Campbell may have inappropriately assumed that all NuVox LSRs were submitted via the EDI gateway interface during the month of May.

In addition, these Flow-Through reports indicate that BellSouth returned a total 111 non-LNP fatal rejects and 316 LNP fatal rejects to NuVox in May. Without knowing exactly how NuVox is counting its LSRs, I cannot determine how many (if any) fatal rejects might be included in Ms. Campbell's total of 3,180 submitted.

Q. ON PAGE 8, MS. CAMPBELL STATES THAT THERE IS A DISCREPANCY AMONG BELLSOUTH'S "ORDERING: FATAL REJECTS" RAW DATA FILE OF 222 FATAL REJECETS FOR NUVOX, BELLSOUTH'S MISCELLANEOUS AGGREGATE % FLOW-THROUGH DETAIL REPORT OF 111 FATAL REJECTS AND NUVOX'S OWN RECORDS OF 271 FATAL REJECTS. CAN YOU PLEASE EXPLAIN THIS?

A. NuVox states that they received 271 fatal rejects but neglected to provide PONs, state whether the orders were LNP or non-LNP, which interface, or

for which of NuVox's seven OCNs. NuVox compared their internal count of 271 fatal rejects to BellSouth's "Ordering:Fatal Rejects" Report and Miscellaneous Aggregate % Flow-Through Detail Report fatal rejects count for non-LNP orders. Without any additional information provided by NuVox on their internal count of 271 fatal rejects, BellSouth cannot properly compare this total to our records. BellSouth's LNP Flow-Through Report does indicate 316 fatal rejects for OCN 2505.

XO FLORIDA WITNESS – ELINA PADFIELD

Q. ON PAGE 4, MS. PADFIELD ASSERTS THAT BELLSOUTH FAILED TO PAY THE TOTAL AMOUNT OF REMEDY PAYMENTS AS REQUIRED BY PARIS DATA ON THE PMAP WEBSITE, INDICATING OVERSTATEMENT OF BST PERFORMANCE ON PMAP.FOR THE MONTH OF APRIL 2001. BELLSOUTH'S PMAP WEBSITE SHOWED A TOTAL PAYMENT DUE XO OF $6,360. HOWEVER, XO RECEIVED A CHECK FROM BELLSOUTH IN JUNE FOR $134,179.16 FOR APRIL. PLEASE EXPLAIN THE DISCREPANCY.

A. This allegation refers to penalties in Georgia, not performance in Florida. There is not an actual discrepancy in the amount f money XO Communications received in June. There have been updates to the measures via Georgia that has led to adjustments in penalty payments. For March Data, BellSouth had an adjustment penalty amount of

$5,635.80 due to XO Communications. For April Data, BellSouth had a payment amount to XSO of $128,543.36. These two amounts totaled $134,179. 16, which was the total amount of March Data adjustments plus April Data payments that were delivered to XO Communications in June.

XO Communications can contact their ALEC Interface Group representative if they have questions regarding the dollar amount received and BellSouth will explain the breakdown of penalty amounts.

Q. IN ADDITION, MS. PADFIELD ASSERTS THAT FURTHER DISCREPANCIES HAVE CONTINUED IN THE MONTH OF MAY. THE PMAP WEBSITE REPORTED A TOTAL OF $480,260 IN PENALTIES DUE XO FROM BELLSOUTH FOR MISSED PERFORMANCE BENCHMARKS. HOWEVER, BELLSOUTH HAS TOLD XO THAT IT WILL BE RECEIVING A PAYMENT OF $31,000 FOR MAY. PLEASE EXPLAIN.

A. This is another Georgia penalty allegation. The primary difference of these numbers is due to the LNP Average Disconnect Timeliness Measure. The Georgia Commission had these payments placed in escrow and ordered reporting on three additional LNP metrics and a modified version of the LNP Average Disconnect Timeliness metric.

Q. MS. PADFIELD ASSERTS THAT BELLSOUTH'S PMAP WEBSITE SHOWS THAT BELLSOUTH MET THE BENCHMARK FOR THE MAY LNP-AVERAGE DISCONNECT TIMELINESS ONLY 3.72% OF THE

TIME. HOW DO YOU RESPOND?

A. As previously discussed, the LNP Average Disconnect Timeliness Measure is flawed and provides no useful information. The Georgia Commission has recognized the flaws. The LNP Average Disconnect Timeliness Metric as currently defined in the Interim Florida SQM, does not accurately capture the end user experience when the telephone number is ported and includes activities in the porting process over which BellSouth has no control. Additionally, this measure is meaningless to the end user and should not be reviewed and analyzed as a meaningful measure.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.