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October 30, 2001

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VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
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Re: Docket No.: 960786-B-TL

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications, Inc. (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

- Comments of Covad Communication Regarding Ongoing Ordering and Provisioning Problems Existing in BellSouth Systems.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

VGK/bae
5 Enclosure

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BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSON

In Re: Consideration of BellSouth	)	
Telecommunications, Inc.'s Entry Into InterLATA	)	Docket No. 960786-B-TL
Services Pursuant to Section 271 of the of	)	
The Federal Telecommunications Act of 1996	)	October 30, 2001

COMMENTS OF COVAD COMMUNICATION REGARDING ONGOING ORDERING AND PROVISIONING PROBLEMS EXISTING IN BELLSOUTH SYSTEMS

COMES NOW, DIECA Communication, Inc. d/b/a Covad Communications Company and files these comments for use in targeting the existing KPMG Third Party Test (hereafter the "KPMG Test") pertaining to ongoing, serious problems in BellSouth's OSS for pre-ordering, ordering and provisioning of xDSL loops and line sharing. This information was originally filed as testimony in the hearing track of this docket, but was stricken from that track. Presumably, these comments will enable KPMG and the Florida Commission to closely monitor specific problems encountered by ALECs in Florida on a daily basis. Covad believes that the manner in which BellSouth provisions loops to Covad can have drastic impacts on Covad's business plan. Covad's success depends largely upon loop delivery performance by BellSouth as well as upon high quality pre-ordering, ordering, repair and maintenance services. These systems also directly affect the ability of ALECs to successfully compete in this market.

I. Ongoing Problems with Access to Loops

A. The LCSC

The function of BellSouth's Local Carrier Service Center (LCSC) is to receive all Covad orders for loops and input them into BellSouth's systems. The LCSC also provides the status of Covad's orders. BellSouth's LCSC should, but does not, provide the same level of customer service in the handling of its ALEC customers as it does for its retail customers. For example, there is no automated call routing system to insure that Covad's calls to the LCSC are answered in a timely manner. Instead, Covad agents must call the LCSC center number and let it ring until someone answers. Additionally, the LCSC does not allow LSRs to be e-mailed by Covad. Moreover, data from various BellSouth systems is incorrect, inconsistent, and unreliable. Each of these issues dramatically affects Covad's ability to successfully compete in Florida.

The lack of automated call routing systems provides an excellent example of the inferior treatment that ALECs receive as compared to retail counterpart organizations. When ALECs call the order center, their phone calls are allowed to ring and ring until someone answers the call. In sharp contrast, in retail order centers, BellSouth has an automated call routing system that sends the calls to the next available representative as well as providing information to the caller about how long the wait time is. As a result, Covad's representatives must wait long periods of time for the calls to be answered or must call back to get information on an order. When calls are dropped into a general voicemail box, Covad's experience is that those messages get lost. This causes Covad to expend time and money to call again and again. As discussed in more detail below, the reason we have to call to obtain status on an order or to get information on a BellSouth clarification of an order is because BellSouth's systems provide inaccurate and contradictory information on ALEC orders.

Until very recently, BellSouth's LCSC required Covad's representatives to speak with the same BellSouth representative who sent an order clarification to Covad. This meant that Covad had to locate the exact BellSouth representative that originally put the Covad order in clarification to get an explanation of why the order had been clarified. This is inefficient and causes Covad to have to leave messages requesting a call back from the originating BellSouth agent, if the agent happens to be unavailable. Covad's inquiries to the LCSC should be able to be resolved with a single call.

BellSouth has modified this system somewhat. BellSouth says that any LCSC representative should be able to address Covad's inquiry. Nonetheless, when BellSouth determines that BellSouth has made an error on an LSR and Covad is calling about that error, Covad must once again be transferred to the original representative. Presumably, BellSouth does this as a training mechanism for its employees. While this might be useful, Covad should not bear the brunt of training BellSouth employees. KPMG should investigate these processes immediately to determine if KPMG, as an ALEC, has experienced similar problems. If not, KPMG should evaluate and document the BellSouth processes that require Covad to endure this cumbersome and unnecessary delay in resolving BellSouth caused errors.

Additionally, BellSouth's LCSC does not allow ALECs to submit orders via e-mail nor does it allow the transmission of LSRs, clarifications, jeopardy notices, etc. by e-mail rather than by facsimile. Even though Covad is implementing electronic ordering, Covad cannot order all types of loops electronically so manual processes must still be used. Specifically, BellSouth does not make available electronic ordering interfaces for UDC/IDSL-Compatible loops, the UCL-ND loop, ADSL or HDSL loops that require conditioning, and line shared loops that require conditioning. Similarly, this process negatively impacts Covad's electronic orders that

fall out for manual handling. These should be managed by a more efficient means of communication such as e-mail rather than by facsimile. BellSouth's Complex Resale Services Group (CRSG) utilizes e-mail for similar processes.

Finally, BellSouth does not have a single source of accurate data for ALEC orders. Order status information is housed in a number of different databases such as CSOTS, CPSS, COSMOS/SWITCH report, and the PON status report. This impacts Covad's ability to issue and status orders correctly and efficiently. In addition, the systems and reports to status orders, PON status reports, CSOTs, and CPSS, contain conflicting information. BellSouth must provide a solution to eliminate the duplicate systems to status orders and a process to insure that the data is consistently accurate and complete.

These issues make it virtually impossible for Covad to obtain nondiscriminatory access to loops. BellSouth's retail order administration operations are run in a far more streamlined and efficient manner. Many of the changes listed above have been repeatedly requested by ALECs; however, BellSouth continually refuses to do what is necessary to provide ALECs with a meaningful opportunity to compete.

B. Stand Alone Loop Provisioning

Covad continues to experience significant problems getting BellSouth to provision stand alone loops, including the UDC/IDSL loops and ADSL, HDSL and UCL-ND loops. One third of Covad's stand alone loop orders are for UDC/IDSL loops. BellSouth continues to have problems provisioning these loops, which Covad has determined is due to (1) incomplete line card information on the work order; and (2) lack of training of BellSouth technicians regarding testing, changing and setting line cards. To accurately reflect the experience of ALECs, KPMG test must carefully evaluate the ordering and provisioning of these loops.

All Covad needs for its IDSL service is a functional and technically compliant ISDN loop. As a result of litigation before the Georgia Public Service Commission, BellSouth developed a new loop product called the UDC/IDSL compatible loop to insure that these loops were provisioned to support IDSL. Before BellSouth had a separate loop for IDSL service, Covad ordered ISDN loops for its IDSL service. Covad has more than three thousand (3000) of those loops, identified in BellSouth's records as ISDN loops. BellSouth has threatened that those customers may experience disruption of service at any time, when BellSouth performs an outside plant rearrangement. To prevent that, BellSouth sought to charge Covad an exorbitant amount of money for what amounts to nothing more than a simple record change so that Covad's loops are all listed as UDC/IDSL loops. This illustrates the type of treatment Covad routinely experiences. BellSouth has a problem in its records, but expects Covad to pay to correct it or run the risk of customer service interruption. Covad does not believe BellSouth treats its own retail customers in the same manner.

There are other problems with the stand-alone loops. As discussed more specifically below, BellSouth's April performance data indicates that ALECs experience twenty (20%) percent repeat troubles within thirty (30) days on these loops for non-dispatch and nine (9%) percent for dispatch. It is obvious from these statistics that BellSouth needs to improve the training given on provisioning these loops.

Many times Covad has experienced unilateral process changes by BellSouth that negatively impact our business. We believe KPMG should evaluate how these process changes are driven at BellSouth and whether BellSouth is properly adhering to its own internal guides regarding notification, etc. The following example illustrates this problem. When a BellSouth technician reports that there has been a missed installation appointment for any reason

(BellSouth caused, Covad caused or end-user caused), Covad has only five (5) business days to submit a supplemental order or BellSouth cancels the order. This interval was ten (10) business days until BellSouth unilaterally changed the interval on April 5, 2001. This change in the process means Covad runs the risk that more loop orders will be cancelled, and have to be resubmitted. It simply makes it more difficult for Covad's order administration group to effectively manage orders.

Covad has repeatedly requested that this process interval be changed back to ten (10) business days. BellSouth's only response is that we must take our request to Change Control, even though BellSouth did not submit its reduction of the interval to Change Control. This example clearly illustrates the kind of discriminatory treatment Covad receives. Moreover, when Covad raised this issue in its Comments on BellSouth's 271 application in Georgia, BellSouth reversed itself. In a letter to Covad, BellSouth stated that "BellSouth changed its cancellation policy from 10 days to 5 days . . . to insure compliance with Performance Measure P-4 (Average Completion Interval) and Order Completion Distribution." Nonetheless, BellSouth stated that it was willing to comply with Covad's request (made through the Georgia Commission) and change the interval back to ten (10) business days.

Covad routinely experiences other problems with BellSouth loop provisioning that make it difficult to compete. BellSouth often causes Covad's customers to lose service, maybe not intentionally, but it does happen. For example, if BellSouth is performing an outside plant upgrade, BellSouth may take one or several Covad customers out of service without knowing. Covad also experiences problems with "stealing pairs." For instance, a BellSouth field technician may be out on a job and find a bad pair. While looking for a good pair at the cross box, the technician takes facilities assigned to Covad customers and uses them for BellSouth

customers. This happens because DSL loops do not have a dial tone. Thus, when BellSouth technicians test the loop for dial tone (to determine if it is spare), they may select a Covad loop to use when no tone is found. As a result, one or more of Covad's customer's transmission is destroyed. These types of things happen all the time and must be immediately escalated to the proper person. It is Covad's belief that some of these issues could be avoided with better training. We have also asked BellSouth to put in place a trouble resolution process for loop problems that result from BellSouth's actions. So far, BellSouth has been unwilling to put such a system in place.

C. Provisioning of Line Sharing

The systems that BellSouth has in place for provisioning line shared loops to Covad are flawed. Essentially, the BellSouth systems are designed to automatically complete a line shared order on the loop delivery due date -- the date BellSouth provides for completion of the order on the FOC. Thus, BellSouth's systems may reflect that a line shared order has been completed, even when the actual cross connection work has not been done in the central office to provision a line shared loop. Thus, the BellSouth systems may generate reports that the line shared order has been completed, without any confirmation that the appropriate cross connection work has been done in the central office. This "auto-complete" aspect of line sharing makes data generated for Missed Installation Appointments for line shared loops from the BellSouth systems highly questionable. To get accurate and complete order status information, Covad must check the COSMOS/SWITCH report, which until recently, was only updated 3 times a week. KPMG should certainly investigate this auto-complete system as well as BellSouth's proposed "fix" for the problem.

BellSouth has also said it has put in place a manual process to try to insure that the auto-completions do not generate incorrect service completion notices from BellSouth. We do not yet know if that manual system will be successful. Moreover, as even BellSouth must acknowledge, if that system fails, erroneous service order completion notices will be generated to Covad. This would create numerous problems since Covad depends on accurate order information to schedule work and to notify customers about when their DSL will be working.

There are other provisioning problems with line sharing as well. Covad continues to receive reports that Covad line sharing orders are not flowing through to the central office technician to complete the cross connects. This problem causes orders to show completed in the systems but the work has actually not be done. BellSouth has said this problem has been addressed by requiring manual intervention, but Covad believes the problem still exists.

These issues are significant because from a parity standpoint because it is impossible to believe that BellSouth has provisioned over 300,000 residential ADSL lines with the same types of processes ALECs have to use to get line sharing. Something is working on the BellSouth side that is just not working on the ALEC side.

II. BellSouth Reported Performance Data

Covad recognizes that a KPMG review of commercial data will follow the completion of the test. We believe that a thorough review is critical to the evaluation of BellSouth's compliance with the 271 Checklist Items. In reviewing this data, KPMG should pay careful attention when comparing what BellSouth has reported as the ALEC aggregate and reported data for individual ALECs. Specifically, it is important for KPMG to investigate the following:

- The timeliness and accuracy of PMAP reports.
- The accuracy of SEEM reports.

- It is difficult to determine the results that BellSouth reports for line shared loops. By that we mean that BellSouth uses "ADSL provided to Retail" as the retail analog for line shared loops. Superficially, that seems to be the correct analog. However, Covad understands that BellSouth has two different products that may be included in "ADSL provided to Retail." One is a business product that includes data transmission guarantees and requires a dispatch to the customer premise 100% of the time; the second is BellSouth's residential ADSL offering that does not entail a dispatch the vast majority of the time. Until BellSouth separates out these types of different product offerings, the "ADSL provided to Retail" analog will be inappropriate for the purposes of comparison.
- Why does BellSouth list some UNE line sharing orders as dispatch? BellSouth does not dispatch a technician to the network interface device (at the customer's premise). All of BellSouth's work is done in the central office.
- Why does BellSouth list so many of its "ADSL to Retail" orders as dispatch? Covad's understanding is that BellSouth does not dispatch a technician to its customer's premise on the vast majority of its residential ADSL loops, which also use line sharing. BellSouth's recent Investor News makes this clear: "Over 90% of new residential DSL customers are opting for self-install, and about 75% successfully install it -- **reducing the need for a home visit**." [BellSouth Investor News, dated April 16, 2001] Essentially, BellSouth performs the necessary work to provision the ADSL service, then sends a kit to the end-user to install. Then the customer removes the routers, filters and performs some very simple installation work. Because there is no truck roll, there is no definitive service order completion date. Thus, BellSouth's

data may mean that it performed the work for its own ADSL service in 9.21 days or it may mean that this interval includes any end-user caused delays (for example, if the end-user failed to install the ADSL kit immediately upon receiving it). Therefore, how BellSouth represents this data is a "best guess" on how long it took to provision ADSL to Retail. Either way, BellSouth's data on its own Order Completion Interval remains highly suspicious.

Until these problems with capturing data (residential v. business ADSL for retail) and measuring intervals are resolved, it is impossible for BellSouth or Covad to rely on this data.

- Why is the Percent Jeopardies so high on xDSL and ISDN orders? What is the underlying problem with these orders?

Covad will continue to actively participate in this proceeding and looks forward to KPMG's acknowledgment of the issues raised in these comments.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing the Comments of Covad Communication Regarding Ongoing Ordering and Provisioning Problems Existing in BellSouth Systems has been furnished by (*) hand delivery or by U. S. Mail on this 30th day of October, 2001, to the following:

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