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July 11, 2002

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 960786B-TL and 981834-TP

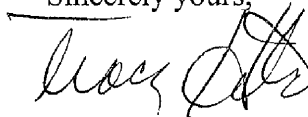
Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC are an original and fifteen copies of AT&T's Proposal to Address KPMG Consulting Exception 88 in the above referenced dockets.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,



Tracy W. Hatch

TWH/amb
Enclosures

cc: Virginia Tate, Esq.
Parties of Record

DOCUMENT NUMBER DATE
07191 JUL 11 08
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)	Docket No. 960786B-TL
Telecommunications, Inc.'s Entry Into)	
InterLATA Services Pursuant to Section 271 of the)	
Federal Telecommunications Act of 1996 – Third)	
Party OSS Test.)	
Petition of Competitive Carriers For Commission)	Docket No. 981834-TP
Action to Support Local Competition in BellSouth)	
Telecommunications, Inc.'s Service Territory)	Filed: July 11, 2002

AT&T Proposal to Address KPMG Consulting Exception 88

On June 27, the Staff of the Florida Public Service Commission filed a Staff Recommendation recommending approval of BellSouth Telecommunications, Inc.'s (BellSouth's) proposed End-to-End Process Flow, Draft Version 2.1, dated June 2002 (hereinafter "50/50 Plan"). This recommendation was deferred from the July 9 Agenda Conference. As was noted in the Staff's recommendation, BellSouth's proposal was submitted to the collaborative forum involved in the existing BellSouth Change Control Process. Contrary to the Staff's Recommendation, the ALECs did not refuse to vote on BellSouth's proposal, but simply disagreed with BellSouth's proposal and did not approve it in the forum. Indeed, BellSouth was responding to an ALEC proposal made on January 30, 2002, which BellSouth would not consider. The ALECs' earlier alternative proposal to BellSouth's 50/50 plan is described below. AT&T Communications of the Southern States, LLC asks that this proposal be adopted by the Commission in addressing KPMG Exception 88.

The complete detailed ALEC proposal is set forth in Attachments 1 and 2. Attachment 1 is a "red-lined" copy of BellSouth's Change Control Process, Version 3.1, issued May 29, 2002, (hereinafter "CCP") that includes both BellSouth's and the ALECs' proposed changes to the CCP presented to the Georgia Public Service Commission July 5, 2002. The

ALEC proposed alternative to BellSouth's 50/50 Plan is found in Section 4, Parts 1 and 2 of Attachment 1. Attachment 2 is the Matrix of Disagreed Items also filed with the CCP in Georgia and describes the disagreements between the ALECs and BellSouth in detail.

The ALECs propose an open, single, unified process for the timely implementation of all change requests regardless of their origin based upon a jointly established prioritization. BellSouth's 50/50 Plan, in contrast, establishes separate tracks for ALEC initiated changes and BellSouth initiated changes, excludes the ALECs from any participation in the BellSouth track, excludes the ALECs from participation in vital portions of the process in the ALEC track, and reserves to BellSouth the right to implement changes that have not been subjected to the change control process.

The ALEC proposal is based on an open single, unified process to implement feature changes according to their priority, in a timely manner, and with a minimum of defects, regardless of who initiated the request. The key aspects of the ALEC proposal are:

Feature changes should be implemented within 60 weeks of their prioritization.

No BellSouth or ALEC initiated changes should be allowed to enter BellSouth's internal development (CCP, Section 4, Part 2, Steps 7-10) without first being subject to the previous steps of the CCP.

BellSouth should provide the ALECs with visibility into its internal development process.

Prioritization ranking, BellSouth preliminary feature sizing model information, and BellSouth release capacity information will be used to sequence the implementation of changes in the various software releases that will occur during the 60-week interval.

BellSouth may alter this sequence only with ALEC concurrence. All prioritized change requests will be assigned to as many future releases as necessary to complete the sequencing process.

The ALECs also propose the inclusion of a Designated ALEC Co-Moderator (DCCoM) function in the CCP¹. The DCCoM will function as a co-moderator in presenting and monitoring the progress of pending change requests to/in the BellSouth Internal Change Management Process. The DCCoM function will enhance BellSouth's process and will also enhance the coordination with the ALECs' parallel internal processes essential to the timely, effective implementation of prioritized changes. Under BellSouth's current policies and under its current proposed changes to the CCP, the ALECs are specifically excluded from participation in BellSouth's internal change management process and have no objective representation.

In response to the proposed DCCoM, BellSouth has argued that it must have privacy to conduct its business affairs and that it should not be subject to having the ALECs directing its business. However, it should be clearly noted that the presence of the DCCoM does not affect BellSouth in the conduct of its business in any way. As proposed, the DCCoM would have no voice or vote in BellSouth's decision making. This proposal simply provides BellSouth with the opportunity to obtain real-time input from its ALEC customers and for its ALEC customers to have direct knowledge in a timely manner of changes which of impact their business. The proposed DCCoM would also allow BellSouth to meet the expectations of the FCC as set forth in the GA/LA 271 Order² - "We encourage BellSouth to continue to accommodate competitive LEC requests to improve the transparency and effectiveness of its Change Control Process." FN 697.

Under the 50/50 Plan, BellSouth proposes a concept it copied from the change control plan of another ILEC - separate BellSouth and ALEC Production Releases. BellSouth

¹ See Step 7 in Section 4, Part 2 CCP; See also item 2 in Attachment 2.

² FCC 02-177; CC Docket No. 02-35.

proposes this work effort would only apply to "the ALEC Production Release being scoped". Further, even within the confines of an ALEC Production Release BellSouth refuses to seek ALEC concurrence to changes, committing only to "provide rationale" should it decide to restructure the implementation order.

The ALECs strenuously disagree with the concept of separate ALEC and BellSouth production releases or "tracks".³ The establishment of a separate path for BellSouth's self-initiated change requests with a guaranteed 50% of the forecast capacity is unwarranted, wasteful of scarce programming resources, and counterproductive. Unified releases maximize the efficient utilization of BellSouth's programming resources. Given that the prioritization and order of implementation under the ALECs' proposal is jointly determined, it is logical that any changes thereafter should be jointly determined and, therefore require ALEC concurrence.

Throughout BellSouth's proposed changes to the CCP reflected in Attachment 1, there are references to how BellSouth will manage the ALEC production releases, but not one mention of how it will manage the so-called BellSouth production releases. BellSouth states that its concept provides "parity" - "Estimated capacity for production releases is equal." However, there is nothing to suggest that a blind equal allocation of capacity has any validity. An analysis of the year 2003 capacity information that BellSouth made available beginning on May 10, 2002, reveals that it is not. In 2003, BellSouth's blind allocation has provided BellSouth with capacity beyond its own needs to the detriment of ALEC needs.⁴

For the CCP to be a joint forward looking proactive process, all parties to the process must have the same detailed information available to them about the elements of the process to be managed and coordinated. In the case of the CCP the principle elements being managed

³ See Item 17 in Attachment 2.

⁴ See Item 17 in Attachment 2.

and coordinated are (1) the change requests and (2) the programming resources available, assigned and expended.

The ALECs propose the on-going sharing of information at each step in the process where the information is likely to change such as prioritization, release package development, release management and implementation, and post implementation. The ALECs' proposal requests that at these points data be provided in the same groupings of categories to allow for tracking and the early detection of potential problems. Appendix I of the CCP (to which the parties have agreed) provides post implementation data in distinct categories. The ALECs propose Appendix 1-A (See Item 48 in Attachment 2 and page 117 of the CCP) for the reporting of Pre-Release Capacity Forecast information and changes during the process steps using the same categories as in Appendix I. With this constancy in the reporting of the basic process data the effectiveness of the process can be analyzed and improvement plans developed.

In contrast, BellSouth's proposal limits providing sizing information to only certain types of change requests, and only at a single point in the process (prioritization). Further, it limits the sharing of information on releases to an annual snapshot in a format and grouping inconsistent with Appendix I making both in progress evaluation of the process and post implementation evaluations impossible (See Item 48 in Attachment 2 and page 118 of the CCP). BellSouth's proposal excludes the ALECs from access to information about the process as changes occur which is vital to the ALECs internal resource planning.

The ALECs are simply requesting "information on each pending change request" and "all future releases" and that Appendix I-A, which is consistent with Appendix I, be used as the basic structure for release capacity forecast information. However, BellSouth is willing to

provide information only on "Type 4 and Type 5 change requests", and estimated release capacity information only "annually" and only for releases planned for "the following year" using Appendix I-B of the CCP, which is inconsistent with Appendix I of the CCP. Limiting the information being provided makes it impossible for the ALECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the Change Control Process.

As shown above, BellSouth's proposed 50/50 Plan is flawed, wasteful, inefficient and potentially discriminatory. The ALEC proposal for a unified open change control process is more fair and efficient and better for both the ALECs and BellSouth. AT&T respectfully requests that the Commission adopt the ALEC proposal in addressing KPMG Exception 88. AT&T will be happy to provide any additional information needed or to answer any questions regarding the ALEC proposal to address KPMG Exception 88.

Respectfully submitted this 11th day of July, 2002.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 11th day of July, 2002.

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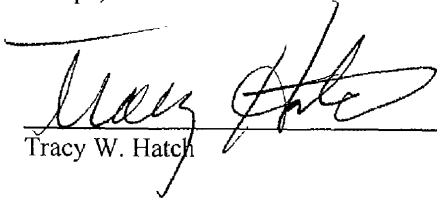
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Tracy W. Hatch

GA -PSC STAFF VERSION
Filed Jointly by the CLEC Coalition and
BellSouth on July 5, 2002

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CHANGE CONTROL PROCESS

CCP05_29.DOC
Version 3.1
May 29, 2002

ATTACHMENT 1

Version 3.1
Issued Date: May 29, 2002

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

Changes to the Change Control Process as described in this document will only be made with the concurrence of the Change Control participants or as directed by a State Public Service Commission. **LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.**

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VERSION CHANGE HISTORY

This section lists changes made to the baseline Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Change Control website at: www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.html

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/19/98		Initial issue.
1.2	02/28/00	All	The EICCP Documentation has been modified to incorporate: <ul style="list-style-type: none"> • Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) • Incorporated manual process • Defined cycle times for process intervals and notifications • Defect Notification process • Escalation Process • Modified Change Control forms to support process changes • Changed EICCP to CCP
1.3	03/14/00	All	The CCP Documentation has been modified to incorporate: <ul style="list-style-type: none"> • Type 6 Change Request, CLEC Impacting Defect • Increased number of participants at Change Review Meetings • Changed cycle time for Types 2-5, Step 3 from 20 days to 15 days • Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community • Web Site address for Change Control Process • Notification regarding the Retirement and Introduction of new interfaces • New status codes for Defect Change Requests • New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (Types 2-5 Change Requests) • Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages • Word changes to provide clarification throughout the document.
1.4	04/12/00	All	The CCP Documentation has been modified to incorporate: <ul style="list-style-type: none"> • Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting • Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days • Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements

			<ul style="list-style-type: none"> • Introduction and Retirement of New Interfaces Section • Dispute Resolution Process • Testing Environment Section • Word changes to provide clarification throughout the document • Monthly Status Meeting Agenda Template • RF1870 Change Request Form changes
1.5	04/26/00	Section 1	<ul style="list-style-type: none"> • Updated CCP web site address
		Section 8	<ul style="list-style-type: none"> • Updated Escalation Contacts for Types 2-6
		Section 11	<ul style="list-style-type: none"> • Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	07/20/00	Section 1	<ul style="list-style-type: none"> • Added "testing" under process changes
		Section 2	<ul style="list-style-type: none"> • Clarification provided in "Change Review Participants" description
		Section 4	<ul style="list-style-type: none"> • Added statement regarding submittal of Change Requests
		Part 2	<ul style="list-style-type: none"> • Clarification provided for documentation changes for Business Rules • Step 2 – Added email notification • Step 3 – Removed "Cancellation by BellSouth" • Step 3 – Clarification on reject reasons
		Section 5	<ul style="list-style-type: none"> • Step 3 – Clarification on internal validation activities • Step 4 – Changed cycle time from 5 to 4 business days for developing workaround • Added defect implementation range
		Section 6	<ul style="list-style-type: none"> • Changed prioritization from "by interface" to "by category" • Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 Business days • Modified the prioritization voting rules
		Section 7	<ul style="list-style-type: none"> • Updates to the Introduction and Retirement of Interfaces
		Section 8	<ul style="list-style-type: none"> • Added Type 6 escalation turnaround time • Changed 3rd Level Escalation contacts for Types 2-6
		Section 11	<ul style="list-style-type: none"> • Removed "Cancellation by BellSouth" and "Defect Canceled" definitions • Removed "Cancellation by BellSouth" from Change Request Form and Checklist
		Appendix A	<ul style="list-style-type: none"> • Added Letter of Intent Form
		Appendix C	<ul style="list-style-type: none"> • Changes to the following forms: Preliminary Priority List, CCP User Registration Form. • Added the following forms: Defect Notification Sample, CR Log Legend
		Appendix D	<ul style="list-style-type: none"> • Added BellSouth Versioning Policy
		All	<ul style="list-style-type: none"> • Word changes to provide clarification throughout the document.

2.0	08/23/00	Cover	<ul style="list-style-type: none"> Removed "Interim" from cover
		Section 3	<ul style="list-style-type: none"> Updated Type 6 definition to incorporate new defect and expedited feature definitions.
		Section 5	<ul style="list-style-type: none"> Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. Reduced the implementation interval for validated defects (High Impact) from 4-30 business days to 4-25 business days, best effort.
		Section 10	<ul style="list-style-type: none"> Added Internet Web sites for EDI and TAG Testing Guidelines
		Section 11 – Terms & Definitions	<ul style="list-style-type: none"> Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts.
		Appendix A	<ul style="list-style-type: none"> Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels.
		All	<ul style="list-style-type: none"> Referenced the handling of expedites and expedite notification where appropriate.
2.1	02/09/01	Section 1 – Intro.	<ul style="list-style-type: none"> Added new language to the 8th bulleted item – "including User Guides that support OSS systems currently within the scope of CCP" Added two new bulleted items dealing with the coordination of test agreements, and questions regarding existing documentation.
		Section 3 – Change Control Decision Process	<ul style="list-style-type: none"> Added "language" for Types 2, 3, 4 & 5 – "Type xx changes may be managed using the Expedited Feature Process as discussed in Section 4, Part 3." Type 6 – CLEC Impacting Defects – Added new defect definition
		Section 4 – Part 1 Detail Process Flow	<ul style="list-style-type: none"> Added #4 to the Activities – Step 1 Added additional sentence to Activity #1 – Step 2
		Section 4 – Part 2 – Types 2-5 Process Flow	<ul style="list-style-type: none"> Added Activity # 5 – Step 4
		Section 4 – Part 3 – Expedited Feature Process	<ul style="list-style-type: none"> Added new Expedited Feature Process definition and flow
		Section 5 – Part 3 – Defect Process	<ul style="list-style-type: none"> New Defect title page and definition Table 5-1 – Step 1 – Activity - #4 – Attach related requirements and specifications documents. These attachments must include the following, if appropriate. Table 5-1 – Step 2 – Cycle Time – Replaced old cycle times with: 4 hrs for High Impact, 1 Bus Day for Medium and Low Impact Table 5-1 – Step 3 – Cycle Time – Replaced old cycle times with: 2 Bus days for High Impact, and 3

			<ul style="list-style-type: none"> Bus Days for Medium and Low Impact Table 5-1 – Step 3 – Outputs – Added new bullet – “Status provided for High Impact Defects to originator via email within 24 hours” Table 5-1 – Step 4 – Activity – Added language to Activity #3 - ...and to the CLEC community via email and web posting. Table 5-1 – Step 4 – Cycle Time – Replaced old cycle times with: 2 Bus Days for High Impact and 4 Bus Days for Medium and Low Impact Table 5-1 – Step 5 – Activity – Added language to #1 - ...to the CLECs and BellSouth. Added language to Activity #2 - ...defect is implemented. Table 5-1 – Step 5 – Cycle Time – Replaced old cycle times to reflect: Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium Impact will be implemented within 90-bus days, best effort. Low Impact will be implemented best effort.
		Part 1 – Change Review – Prioritization – Release Package Development and Approval	<ul style="list-style-type: none"> Part 1 – Change Review Meeting – 4th paragraph NOTE: Added language to address meetings would occur in March, June, September and December Part 2 – Change Review Meeting – 4th bullet – Added new bullet - ...BellSouth’s estimate of the size and scope of each Change Request Part 4 – Developing and Approving Release Packages – 1st bulleted item: New language
		Section 7 – Introduction and Retirement of Interfaces	<ul style="list-style-type: none"> Retirement of Interfaces – 1st paragraph sentence: New language Retirement of Versions – New language Retirement of Versions – Appeal language New Language for Type 6 High Impact Issues and Medium and Low Impact issues Types 2-6 Changes – 1st paragraph – new language
		Section 8 – Escalation Process	<ul style="list-style-type: none"> Types 2-6 Changes – Contact List for High, Medium and Low Impact escalations
		Section 8 – Dispute Resolution Process	<ul style="list-style-type: none"> New definition language
		Appendix A	<ul style="list-style-type: none"> Updated CR form & checklist
		Appendix C	<ul style="list-style-type: none"> Updated RF1874 User Registration Form
2.1A	02/15/01	All	<ul style="list-style-type: none"> Updated various sections of the document to change “language” from defect/expedite to defect and/or expedited features Changed reference from Section 9.0 to Section 11.0 – Terms and Definitions where appropriate Minor “cosmetic” changes throughout document
		Section 8	<ul style="list-style-type: none"> New 2nd Level Escalation Contacts for Types 2-6
2.2	03/26/01	Section 3	<ul style="list-style-type: none"> Replaced “business or software requirements” with “user requirements” throughout definition

Section 4	<ul style="list-style-type: none"> • Updated the "Type 1 System Outage" language to reflect the posting of outages via email within 15 minutes of verified outage • Additional language for Step 3 – Reviewing Change Request for Acceptance • Additional language for Step 3 – OBF issues • Added word "preliminary" in Activity #5 of Step 4 – Prepare for Change Review Meeting • Additional language for Step 4 – Prepare for Change Review Meeting – Sizing information • Added activities #4 & #5 under Step 5 – Conduct Change Review Meeting • Updated activity #3 under Step 5 – Conduct Change Review Meeting – Prioritization Meetings • Updated Activities #4, #5, #7, & #8 under Step 8 – Conduct Release Package Meeting including Inputs and Outputs. • Updated the 1st bulleted statement in Step 9 – Create Release Package Notification • Added words "for software changes" in Activity #3 under Step 10 – Release Management and Implementation • Updated Activity #4 in Step 5 – Release Management and Implementation to clarify "associated with expedited features"... "if applicable" • Added the words "submitted" to define the type of defect; the word "ordering" to define the type of enhancement; and the word "interface" to replace the words "product and services" throughout the definition of Expedited Feature – Part 3. • Part 3 – Expedited Feature Process – Step 4 – Internal Change Management Process: Added the word "minor" to better identify the type of release that formerly was identified as "point". Also updated language in Cycle Time to reflect "case by case basis not to exceed 25 days."
Section 5	<ul style="list-style-type: none"> • Updated flow-chart – Figure 5-1 – Type 6 Process Flow to reflect agreed upon cycle times. • Updated Title Page and Definition – Defect Process – 2nd paragraph – Added word "user" to identify type of requirements. • Added additional bullets (#5 and #6) to Step 3 – Type 6 Detail Process Flow – Internal Validation. • Updated cycle times for High, Medium and Low Impact Defects in Step 3 – Internal Validation. • Updated cycle times for High, Medium and Low Impact Defects in Step 4 – Develop and Validate Workaround.
Section 6	<ul style="list-style-type: none"> • Updated 1st paragraph in Part 1 – Change Review Meeting to identify categories (pre-order/order, maintenance, manual and documentation, etc.) • Added word "preliminary" to 4th bulleted statement in Part 2 – Change Review Package. • Added new 4th bulleted item under Part 3 – Prioritizing Voting Rules. • Updated 6th bulleted statement under Part 3 –

			<ul style="list-style-type: none"> Prioritizing Voting Rules to reverse the forced ranking to read (1 to N, with 1 being the highest) Added new 7th bulleted item under Part 3 – Prioritizing Voting Rules to add the words “or have little value to the CLEC”. Updated the language for the “Introduction of New Interfaces”.
		Section 7	<ul style="list-style-type: none"> Updated 1st paragraph – 1st sentence under “Retirement of Interfaces”.
		Section 8	<ul style="list-style-type: none"> Added new 7th bulleted item under the “Escalation Process – Guidelines” to specify the time allowed for a status for Type 6 High Impact and Medium and Low Impact issues. Added new 8th bulleted item under the “Escalation Process – Guidelines” to specify the time allowed for a status for Types 2-5 Expedited Feature Process issues. Removed the entire section under the “Contact List for Escalation – Types 2-6 Changes” since duplication exists under “Guidelines”.
		Section 9	<ul style="list-style-type: none"> Updated the entire section under “Changes to the Process” with new language.
		Appendix	<ul style="list-style-type: none"> Added a new section in the Appendix to define the “Sub-Team Definition and Roles/Responsibilities”. Added a new section in the Appendix to give a “Sample” Voting Ballot
2.3	05/18/01	Section 4	<ul style="list-style-type: none"> Updated Step 3, Activity #3, first “bulleted” item to identify a “CLEC” training issue. Updated Step 5, Activity #7 to remove reference to ‘CRC’ status. Updated Step 7, Activity #1 to remove “criteria established by the Internal Change Management Process” language.
		Section 5	<ul style="list-style-type: none"> Added separate section (5.2) to document the flow for Documentation Defects.
2.4	07/02/01	Section 4	<ul style="list-style-type: none"> Part 2 – Types 2-5 Process Flow – Step 6 – Document Change Review Meeting Results – Cycle Time – 5 days Part 2 – Types 2-5 Process Flow – Step 7 – Internal Change Management Process – Cycle Time – Quarterly Part 2 – Types 2-5 Process Flow – Step 7 – Internal Change Management Process – Activity 2 “Sizing and Sequencing of prioritized change requests...” Part 2 – Types 2-5 Process Flow – Step 8 – Conduct Release Package Meeting – Activity 4 Part 2 – Types 2-5 Process Flow – Step 8 – Conduct Release Package Meeting – Cycle Time – Major and Minor Releases Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Draft User Requirements Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity

		<ul style="list-style-type: none"> 4 – Major Releases – Final User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Final Specs • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Business Rules • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Notification • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Draft User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Final User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Final EDI Specs • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Business Rules • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Draft User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Final User Requirements • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Final Specs • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Business Rules • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Adding sub-process activity #5 • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity #5 • Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Outputs – Adding four (4) bulleted items
	Section 6	<ul style="list-style-type: none"> • Part 3 – Expedited Feature Process – Step 3 – Review Change Request for Acceptance • Part 2 – Change Review Package – Adding bulleted statement “Schedule of releases” • Part 4 – Developing and Approving Release Packages – Defining by release when the evaluation and analyzing Candidate Change Requests will take place.
	Section 10	<ul style="list-style-type: none"> • Part 4 – Developing and Approving Release Packages – Defining what will occur during the Release Package meeting. • Testing Environment – Adding “Language” to define “testing opportunities”.

		Terms and Definitions	<ul style="list-style-type: none"> Updated Release definitions
		Appendix	<ul style="list-style-type: none"> Added Appendix G – Customer Notifications
2.5	07/18/01	Section 9	<ul style="list-style-type: none"> Removed "BellSouth" from voting language (associated with CR0411)
		Section 8	<ul style="list-style-type: none"> Updated 1st point of contact for escalating Type 1 system outage process.
2.6	09/10/01	Section 4	<ul style="list-style-type: none"> Part 2, Step 3, Changing Cycle time to 10 Business Days for Reviewing Change Request for Acceptance. Part 2, Step 7, Changing Cycle time to 25 Business Days for Conducting Release Package Meeting Part 3, Step 3, Changing Cycle time to 20 Business Days for Reviewing Change Request for Acceptance.
		Section 5	<ul style="list-style-type: none"> Step 3, Changing Cycle time to 1 Business Day for High Impact Step 4, Changing Cycle time to 1 Business Day for developing Workaround for High Impact Defects Step 4, Changing Cycle time to 2 Business Days for developing Workaround for Medium Impact Defects Step 5, Changing Cycle time to 10 Business Days, best effort.
2.7	12/07/01	Section 3	<ul style="list-style-type: none"> Type 1 System Outage – Changing "language" to clarify when BellSouth will post the system outage to the web and notify the CLECs via Email.
		Section 4	<ul style="list-style-type: none"> Part 1 – Tables 4-1 & 4-2 (Step 2) - Type 1 System Outage – Changing "language" to clarify when BellSouth will post the system outage to the web and notify the CLECs via Email.
		Section 6	<ul style="list-style-type: none"> Adding new rules for "Remote Prioritization Voting"
		Section 7	<ul style="list-style-type: none"> Adding "language" to better clarify when Software versions are retired.
2.8	03/15/02	Section 4	<ul style="list-style-type: none"> Add "Between Steps 3 & 4" of the flowchart: Pending Change Requests – BST Preliminary Feature Sizing Model Add (Oval Textbox): 30 bus days allowed to complete preliminary feature sizing model prior to Quarterly prioritization meeting. Add note after Step 3 and before Step 4: NOTE: 30 business days allowed to complete preliminary feature sizing model on pending change requests. Step 4, #5 will change to read as follows: (BCCM) 5. Provide Preliminary Feature Sizing Model and scope information on each pending change requests to CLECs. Add new bullet in the INPUTS section for BST Preliminary Feature Sizing Model Change the third bullet in the OUTPUTS section to read as BST Preliminary Feature Sizing Model and scope on each Pending change request. Step 5, #3 add language to read: BellSouth presents the Preliminary Feature Sizing Model and scope of each change request. See Appendix H for

			<p>information to be provided. BellSouth presents the number of major releases and dates targeted for the next 12 months.</p> <ul style="list-style-type: none"> • Change the last bullet in the INPUTS section to read: Preliminary Feature Sizing Model and scope on each pending change request.
		Section 6	<ul style="list-style-type: none"> • In the definition, the third paragraph will read: The Change Request Log will be distributed 5-7 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status at least 30 business days in advance of the distribution of the Change Review Package to assure completion of the Preliminary Feature Sizing Model. Other Change Requests, placed in pending status after the 30 business days cutoff will also be available for prioritization but may not have the Preliminary Feature Sizing Model information. • Changed the "language" of the 4th bulleted item under Part 2: Change Review Package – BellSouth's Preliminary Feature Sizing Model and scope of each Change Request (See Appendix H for information to be provided)
		Appendix H	<ul style="list-style-type: none"> • Added new Appendix H: Preliminary Feature Sizing Model for CCP Prioritization Planning
2.9	4/22/02		
		Section 1	<ul style="list-style-type: none"> • Added "the development and" in the first paragraph and associated footnotes. • Added "and documentation" in the 2nd paragraph. • Added the proper point of contacts for the coordination of test agreements and questions regarding existing documentation • Added objective "timely and effective implementation of feature and defect change requests"
		Section 2	<ul style="list-style-type: none"> • Added language under the Change Review Participants section to reflect that a LCSC and IT representative will participate in CCP meetings. • Updated CCCM section to reflect that the CCCM is the individual CLEC point of contact
		Section 3	<ul style="list-style-type: none"> • Added "Notification" after Type 1 – System Outage • Replaced "change request" with "outage report" on Type 1
		Section 4 – Part 1	<ul style="list-style-type: none"> • Type 1 Process Flow – Step 4, Activity 4 – ECS will provide the CLEC with a trouble ticket number unless the CLEC caller prefers not to obtain one. • Step 3, Inputs – added "email to CCP distribution"
		Section 4 – Part 2	<ul style="list-style-type: none"> • Types 2-5 Process Flow – Step 3, Note regarding BST's reason will be provided in writing on the change request if a request cannot be accepted. • Added note between Steps 3 and 4 to reflect there is a 30 business day process operating in parallel in which BST completes its preliminary feature sizing model on pending change requests. • Step 8, Activity 6, removed "if possible".

		<ul style="list-style-type: none"> Step 10, Activity 4, re-designation of "major release" as "production release" and elimination of "minor release"
Section 4 – Part 3		<ul style="list-style-type: none"> Removed the word "ordering" in the expedited feature process Step 3, Note, BST reason will be provided in writing on the updated change request if cannot be supported.
Section 6		<ul style="list-style-type: none"> Removed Type 3 from the Prioritization Voting Rules
Section 7		<ul style="list-style-type: none"> Added that BST will introduce "the development and implementation of business requirements and functionality for" new interfaces. Word changes in 1st paragraph regarding introduction of new interfaces. Added in 1st paragraph that BST will proactively seek, consider and respond to CLEC comments and requests for enhancements to the specifications. Added that BST will maintain an ongoing matrix of current and retired software versions in the monthly CCP meetings
Section 8		<ul style="list-style-type: none"> Wording changes to the Dispute Resolution process and added third bullet to reflect that the impacted CLEC has option to provide notice of any mediations or formal complaints to CCP participants.
Section 9		<ul style="list-style-type: none"> Revised Change Control Process voting from a five-step to a three-step continuum
Section 10		<ul style="list-style-type: none"> Added LENS to the Definition section. Added language that BST will identify the process for testing the new release in CAVE and will provide a New Release Testing Schedule
Section 11		<ul style="list-style-type: none"> Updated definition of CLEC Affecting Change and added footnote. Removed "Appeal" under "Change Request Status definition"
Appendix A		<ul style="list-style-type: none"> Updated Change Request Form to remove "Appeal" (Attachment A-1) Updated Change Request Form Checklist to remove "Appeal" (Attachment A-1A) Updated Change Request Clarification Response (Attachment A-2) Updated Change Request Clarification Checklist (Attachment A-2A)
Appendix I		<ul style="list-style-type: none"> Added Appendix I – Monitoring and Reporting Post-Release Capacity Utilization
3.0	5/1/02	
Section 1		<ul style="list-style-type: none"> 2nd paragraph – changed "business" to "operational". 2nd paragraph – added sentence, "Parties agree to discuss the need for deviation from the process should such need arise."
Section 3		<ul style="list-style-type: none"> Added to System Outage Notification paragraph: A log of all outages will be posted to the CCP website

	<ul style="list-style-type: none"> on a monthly basis. Added "With mutual consent by the participants", Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3. Added "With mutual consent by the participants", Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3. Added "With mutual consent by the participants", Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3. Added under Type 6-CLEC Impacting Defects-High Impact, "Correction of high impact defects will occur within 10 business days following the date upon which BST's defect validation process is scheduled to complete".
Section 4.0 – Part 1	<ul style="list-style-type: none"> Added note after Step 5 – "A log of all outages will be posted to the CCP website on a monthly basis." Add to Step 3 Outputs & Step 4 Inputs: EC Support will provide a status update, via web and email, when the status changes.
Section 4.0 – Part 2	<ul style="list-style-type: none"> Step 3 – Removed the note regarding OBF issues.
Section 4.0 – Part 3	<ul style="list-style-type: none"> Expedited Feature Process - Removed the word "minor" – "The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, or next release, best effort." Expedited Feature Process – Step 4 - Removed the word "minor" – "The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, or next release, best effort."
Section 5.0	<ul style="list-style-type: none"> Added under High Impact, "Correction of high impact defects will occur within 10 business days following the date upon which BST's defect validation process is scheduled to complete". Step 5 – spelled out the word "business" Step 6, Activity #2, added the following note: In the event correction of the defect may potentially cause the CLECs to perform coding or business procedure changes. BellSouth will provide notification and appropriate documentation with the release notification. Step 6, Activity #2, Outputs, added: Documentation of potential CLEC coding/process changes.
Section 7.0	<ul style="list-style-type: none"> 1st paragraph, word changes to the last sentence to read: "As new interfaces, within the scope of CCP, are deployed, they will be added to the scope of this document and all subsequently requested changes will be managed by this process."
Section 8.0	<ul style="list-style-type: none"> Added the following bullet for Escalation Cycle for

		Types 2-6 changes: BST will provide updates to the CLEC when the status changes.
Section 10.0		<ul style="list-style-type: none"> Changed "Account Team" to "CLEC Care EC/OSS Support Team"
Section 11.0		<ul style="list-style-type: none"> Changed "Account Team" to "BST CLEC Care Organization" for BFR. Added note under Change Request status: "BST will respond within seven (7) business days to a CLEC's request for clarification of a specific BellSouth response to a change request. Removed "Appeal" status from Defect Status. Removed "minor" from last sentence under E pedited Feature.
Appendix C		<ul style="list-style-type: none"> Updated "Preliminary Priority List" – changed "N" to "1" Updated Change Control Process –CR LOG Legend
Appendix E		<ul style="list-style-type: none"> Added the following sentence: "The Sub-Team leader or representative will participate in each Monthly CCP Status Meeting occurring during the life of the Sub-Team.
Appendix H		<ul style="list-style-type: none"> Added the definitions corresponding to Appendix H- Preliminary Feature Sizing Model
3.1	5/29/02	
Page 2		<ul style="list-style-type: none"> Replaced 1st sentence to reflect that changes to the CCP as described in this document will only be made with the concurrence of the CCP participants or as directed by a State Public Service Commission.
Section 1		<ul style="list-style-type: none"> 3rd paragraph – Added "Examples of changes to which the CCP will apply include, but are limited to..." Added "Interfaces of Gateways" title. Added "Linkages" Added "Legacy Systems" and footnote Added "Work Centers" For the type of changes handled by this process, added billing: Processes (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance, billing and testing) Added bullet: Changes to Legacy Systems that arise from the interface or gateway transactions. Added bullet regarding the scope of CCP does not include the following: Requests for changes to billing functions and systems that require modifications of industry standards will be handled through the appropriate national forum, for example, the OBF or CABS BOS TRG.
Section 4 Part 2		<ul style="list-style-type: none"> Added "and CCCM" to Step 10, Activity 2.
Section 4 Part 3		<ul style="list-style-type: none"> Added "and CCCM" to Step 5, Activity 2.
Section 7		<ul style="list-style-type: none"> Changed "120" to "180" for advance notification BST will provide when software versions of a specific interface are retired/expired.

Appendix J	<ul style="list-style-type: none">• Added Appendix J – Changes to Legacy/Backend Systems for Pre-Ordering, Ordering, Provisioning, Maintenance, Billing and Repair or wholesale work center operations.
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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the development and introduction of new interfaces¹, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users² of BellSouth's Electronic Interface Applications, associated manual process improvements and documentation, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

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

Examples of changes to which the Change Control Process will apply include, but are not limited to, change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

Interfaces or Gateways

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

¹ The procedures described in this document apply to all three groupings of the components of "interfaces" as described by the FCC. These include (1) a point of interface (or gateway); (2) any electronic or manual processing links (transmission links) between the interface and BellSouth's internal operations systems (including all necessary back office systems and personnel); and (3) all of the internal operations support systems (or "legacy systems") that BellSouth uses in providing network elements and resale services to competing carriers. Refer to Section 7.0, Introduction of New Interfaces, for further definition of development.

² The definition of "CLEC Affecting Changes" is provided in Section 11, Terms and Definitions, below.

Linkages

LEO – Local Exchange Ordering
LESOG – Local Exchange Service Order Generator
LNP Gateway – Local Number Portability Gateway
LAUTO – Local Number Portability Automation
SGG – ServiceGate Gateway
 - SOG – Service Order Generator
 - DOM – Delivery Order Manager

Legacy Systems³

SOCS – Service Order Communications System
LMOS – Loop Maintenance Operations System
RSAG – Regional Street Address Guide
ATLAS – Application for Telephone Number Load Administration
& Selection
LFACS – Loop Facilities Assignment & Control System
CRIS – Customer Records Information System
CABS – Carrier Access Billing System
BIBS – BellSouth Industrial Billing System
Tapestry
WFA – Work Force Administration

Work Centers

LCSC – Local Carrier Service Center
CWINS – Customer Wholesale Interconnection Network Services

³ Legacy System Releases that may impact CLECs and work center operational changes listed in the table above will be posted on the Web. See Appendix J for Legacy Systems Release/Work Center Form.

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

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interface)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance, billing and testing)
- Changes to Legacy Systems that arise from the interface or gateway transactions
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, including User Guides that support OSS systems currently within the scope of CCP)
- Defects
- Expedited Features

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

- BonaFide Requests (BFR)
 - Production Support (i.e., adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
 - Contractual Agreements
 - Collocation
 - Requests for changes to billing functions and systems that require modifications of industry standards will be handled through the appropriate national forum, for example, the OBF or CABS BOS TRG
 - Coordination of test agreements will continue to be supported by the CLEC Care EC/OSS Support Team as indicated at www.interconnection.bellsouth.com/contact/index.html
 - Questions regarding existing documentation should be handled by the CLEC Care organization as indicated at www.interconnection.bellsouth.com/contact/index.html
- However, if documentation needs to be changed for clarification purposes, a defect change request should be submitted through Change Control.

Objectives of the Change Control Process:

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

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

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

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

http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html

2.0 CHANGE CONTROL ORGANIZATION

Definition

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

Change Review Participants

Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests.

A representative of the Local Carrier Service Center (LCSC) and IT will participate in CCP meetings. The appropriate SMEs and Project Managers will participate as needed⁴. In addition, a quarterly technical meeting with the BellSouth Technical Team will be held with the CCP participants. BellSouth requests that the CLECs have their Technical teams present at this meeting as well.

The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process Step 7 for Types 2-5 changes).
CLECs: No BellSouth initiated Change Request may be input to BellSouth's internal process at Step 7 without first being subject to the previous steps of this process.
BST: The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process Step 7 for Types 2-5 changes) for scheduling CLEC Production Releases.

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

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

BellSouth Change Control Manager (BCCM)

The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2-6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change

⁴ Where necessary, this is to include BellSouth's authorized representatives.

Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM)

The CCCM is the individual CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing their company's Change Requests at the Change Review Meetings.

CLECs:

Designated CLEC Co-Moderator (DCCoM)

The DCCoM will function as a co-moderator in presenting and monitoring the progress of pending change requests to/in the BST Internal Change Management Process. The CLECs will appoint two individuals from different non-BellSouth companies to perform this function. These positions may rotate within the participating CLECs as they so desire. Either or both of the DCCoMs will participate in each BST Internal Change Management Process meetings.

BST: Does not support because it still needs to conduct internal meetings to run its business without CLEC participation.

Release Management Project Team

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

3.0 CHANGE CONTROL DECISION PROCESS

Definition

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

Type 1 – System Outage Notification⁵

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. BellSouth has 15 minutes to notify the CLECs via e-mail and web posting once the Help Desk has verified the existence of an outage having a duration of 20 minutes or greater. Either BellSouth or a CLEC may initiate the outage report. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth. A log of all outages will be posted to the CCP website on a monthly basis.

Type 2 – Regulatory Change

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. **CLECs: When the mandate does not include a specific implementation date the intervals described below for the implementation of Type 4 and Type 5 changes will apply. BST: BellSouth reserves the right to implement a Type 2 change earlier/later than 60 weeks. BellSouth will communicate such changes to the CLECs, providing at least a 30 day notification.**

Either BellSouth or a CLEC may initiate the change request. With [mutual consent by the participants], Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3. **BST: BellSouth has revisited the "mutual consent by the participants for Type 2" issue and cannot support. See Section 4, Part 3 for recommendation for handling.**

Type 3 – Industry Standard Change

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either

⁵ Type 1 – System outages are not in fact "change requests" but are managed within the CCP for convenience.

BellSouth or a CLEC may initiate the change request. With mutual consent by the participants, Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 4 – BellSouth Initiated Change

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, Billing and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). **CLECs:** The implementation of Type 4 changes will occur within (no later than) 60 weeks from prioritization of the change, unless a **Negotiated Extended Implementation Interval** has been agreed to. **BST:** The implementation of Type 4 changes will occur within (no later than) 60 weeks from prioritization of the changes, subject to available capacity.

CLECs: Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the various software releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative anticipated work effort required. **BST:** Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the CLEC Production Releases that will occur during the 60-week interval subject to available capacity. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative estimated anticipated work effort required.

(CLECs) With mutual consent by the participants Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3. **BST:** With mutual consent by the participants, Type 4 changes within the CLEC Production Releases may be managed using the Expedited Feature Process, as discussed in Section 4.0, Part 3.

Type 5 – CLEC Initiated Change

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

organizations (which are Type 3 Changes). CLECs: The implementation of Type 5 changes will occur within (no later than) 60 weeks from prioritization of the change, unless a Negotiated Extended Implementation Interval has been agreed to. BST: The implementation of Type 5 changes will occur within (no later than) 60 weeks from prioritization of the change request, subject to available capacity.

CLECs: Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the various software releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative anticipated work effort required. BST: Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the CLEC Production Releases that will occur during the 60-week interval subject to available capacity. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative estimated anticipated work effort required.

With mutual consent by the participants, Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 6 – CLEC Impacting Defects

A Type 6 defect request is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect. BST New Proposal for this paragraph: If functional requirements agreed upon by BellSouth and the CLECs, do not result in the expected outcome and new user requirements and/or business rules are required, then this change request is not classified as a defect (i.e., Type 6) but rather a Type 4 (BST initiated) or Type 5 (CLEC initiated). It will follow normal process for implementing as a Type 4 or 5.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels:

- High Impact – The failure causes impairment of critical system functions and no electronic workaround solution exists. Correction of high impact defects will occur within 10 business days following the date upon which BellSouth's defect validation process is scheduled to complete.

- Medium Impact – The failure causes impairment of critical system functions, though a workaround solution does exist. **CLECs:** Correction of medium impact defects will occur within 20 business days following the date upon which BellSouth's defect validation process is scheduled to complete. The implementation of a workaround solution does not constitute correction of a medium impact defect. **BST:** BellSouth recommends as an alternative: Correction of medium impact defects will occur within 45 business days or the next available maintenance release following the date upon which BellSouth's defect validation process is scheduled to complete. The implementation of a workaround solution does not constitute correction of a medium impact defect. **NOTE:** The 45 business day interval is contingent upon approval of BellSouth's proposed new language in the 3rd paragraph of the Section 5.0 Defect definition.

- Low Impact – The failure causes inconvenience or annoyance. **CLECs:** This reduces the efficiency of CLEC operations, increases CLEC operating costs, and introduces delay and impacts CLEC customer service performance. Correction of low impact defects will occur within 30 business days following the date upon which BellSouth's defect validation process is scheduled to complete. **BST:** BellSouth recommends as an alternative: Correction of low impact defects will occur within 60 business days. **NOTE:** The 60 business day interval is contingent upon approval of BellSouth's proposed new language in the 3rd paragraph of the Section 5.0 Defect definition.

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

Figure 3-1 – Change Control Decision Process

Shows the top-level process that will be used to evaluate Change Requests. The BellSouth CLEC Care Organization will handle BFR requests and production support issues. Enhancements, defects and expedited features will be handled through the Change Control Process.

4.0 CHANGE CONTROL PROCESS FLOW

The following three (3) sub-sections describe the process flows for typical Type 1 through Type 5 changes, including expedited features. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

Part 1: Type 1 System Outage Process Flow

Figure 4-2: Type 1 Process Flow

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

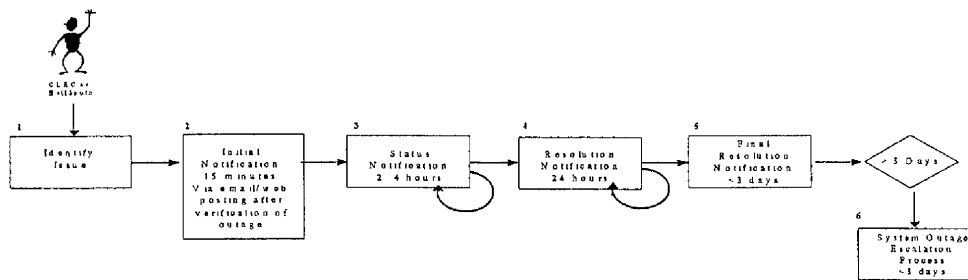


Table 4-1: Type 1 Cycle Times

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

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

	1	2	3	4	5	6
Process Description	Identify Issue	Initial Notification	Status Notification	Resolution Notification	Final Resolution Notification	Escalation
Cycle Time	N/A	Via email within 15 minutes of the outage verification BST website will be posted with outage information	2-4 Hours (Iterative)	24 Hours (Iterative)	< 3 Days	> 3 Days System Outage Escalation Process

Table 4-2: Type 1 Detail Process Flow

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

STEP 1		
Accountability:	CLEC Change Control Manager (CCCM), Electronic Communications System Support (ECS)	
Sub-Processes/Activities	IDENTIFY ISSUE	<ol style="list-style-type: none"> 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface) 2. Call the BST Electronic Communications Support (ECS) Help Desk at 888-426-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number, unless the CLEC caller prefers not to obtain one, to record and track the outage.
INPUTS	<ul style="list-style-type: none"> • Issue Characteristics • Call to ECS Helpdesk 	
OUTPUTS	<ul style="list-style-type: none"> • Recorded Outage 	
CYCLE TIME	N/A	

STEP 2	
Accountability:	Electronic Communications System Support (ECS)
Sub-Processes/ Activities	<p>INITIAL NOTIFICATION</p> <ol style="list-style-type: none"> 1. ECS will post to the Web an initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An email to the CLECs participating in Change Control will also be distributed. The system ticket number of the outage will be included in the web posting and the email notification. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis. 3. ECS will continue to work towards the resolution of the problem. 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.
INPUTS	<ul style="list-style-type: none"> • Recorded Outage
OUTPUTS	<ul style="list-style-type: none"> • Industry Notification posted on Web • Email to CLECs participating in Change Control • (CLECs) Resolution information include root cause and fix. <p>BST: BellSouth recommends as an alternative: EC Support will continue to provide resolution notification, including the reason for the outage and the resolution. NOTE: BellSouth suggested and CLECs agreed to a 2 month trial to determine if the information provided with the "root cause" is acceptable to the CLECs. Being monitored in the CCP Monthly Status Meetings.</p>
CYCLE TIME	BellSouth has 15 minutes to notify the CLECs via e-mail and web posting once the Help Desk has verified the existence of an outage having a duration of 20 minutes or greater.

STEP 3									
Accountability:	Electronic Communications System Support (ECS)								
Sub-Processes/ Activities	<table border="1"> <tr> <td>STATUS NOTIFICATION (Iterative)</td> <td> <ol style="list-style-type: none"> 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry/affected parties. The following information may be discussed: <ul style="list-style-type: none"> • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified, continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified. </td> </tr> <tr> <td>INPUTS</td> <td> <ul style="list-style-type: none"> • Industry Notification posted on web and email to CCP distribution </td> </tr> <tr> <td>OUTPUTS</td> <td> <ul style="list-style-type: none"> • EC Support will provide a status update, via web and email, when the status changes • Resolution information </td> </tr> <tr> <td>CYCLE TIME</td> <td>2-4 Hour Intervals</td> </tr> </table>	STATUS NOTIFICATION (Iterative)	<ol style="list-style-type: none"> 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry/affected parties. The following information may be discussed: <ul style="list-style-type: none"> • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified, continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified. 	INPUTS	<ul style="list-style-type: none"> • Industry Notification posted on web and email to CCP distribution 	OUTPUTS	<ul style="list-style-type: none"> • EC Support will provide a status update, via web and email, when the status changes • Resolution information 	CYCLE TIME	2-4 Hour Intervals
STATUS NOTIFICATION (Iterative)	<ol style="list-style-type: none"> 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry/affected parties. The following information may be discussed: <ul style="list-style-type: none"> • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified, continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified. 								
INPUTS	<ul style="list-style-type: none"> • Industry Notification posted on web and email to CCP distribution 								
OUTPUTS	<ul style="list-style-type: none"> • EC Support will provide a status update, via web and email, when the status changes • Resolution information 								
CYCLE TIME	2-4 Hour Intervals								

STEP 4			
Accountability:	Electronic Communications System Support (ECS), CLEC Change Control Manager (CCCM)		
Sub-Processes/ Activities	<table border="1"> <tr> <td>RESOLUTION NOTIFICATION (Iterative)</td> <td> <ol style="list-style-type: none"> 1. The resolution notification is posted to the web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 Defect box. 3. If the resolution is not the final resolution, the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. </td> </tr> </table>	RESOLUTION NOTIFICATION (Iterative)	<ol style="list-style-type: none"> 1. The resolution notification is posted to the web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 Defect box. 3. If the resolution is not the final resolution, the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution.
RESOLUTION NOTIFICATION (Iterative)	<ol style="list-style-type: none"> 1. The resolution notification is posted to the web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 Defect box. 3. If the resolution is not the final resolution, the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 		

	4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".
INPUTS	<ul style="list-style-type: none"> • EC Support will provide a status update, via web and email, when the status changes • Resolution information
OUTPUTS	<ul style="list-style-type: none"> • Resolution Information posted on web • Final Resolution Information
CYCLE TIME	24 Hours after reporting outage

STEP 5	
Accountability:	Electronic Communications System Support (ECS)
Sub-Processes/Activities	FINAL RESOLUTION NOTIFICATION 1. The final resolution notification is posted on the web.
INPUTS	<ul style="list-style-type: none"> • Final Resolution Information
OUTPUTS	<ul style="list-style-type: none"> • Final Resolution Notification
CYCLE TIME	< 3 Days

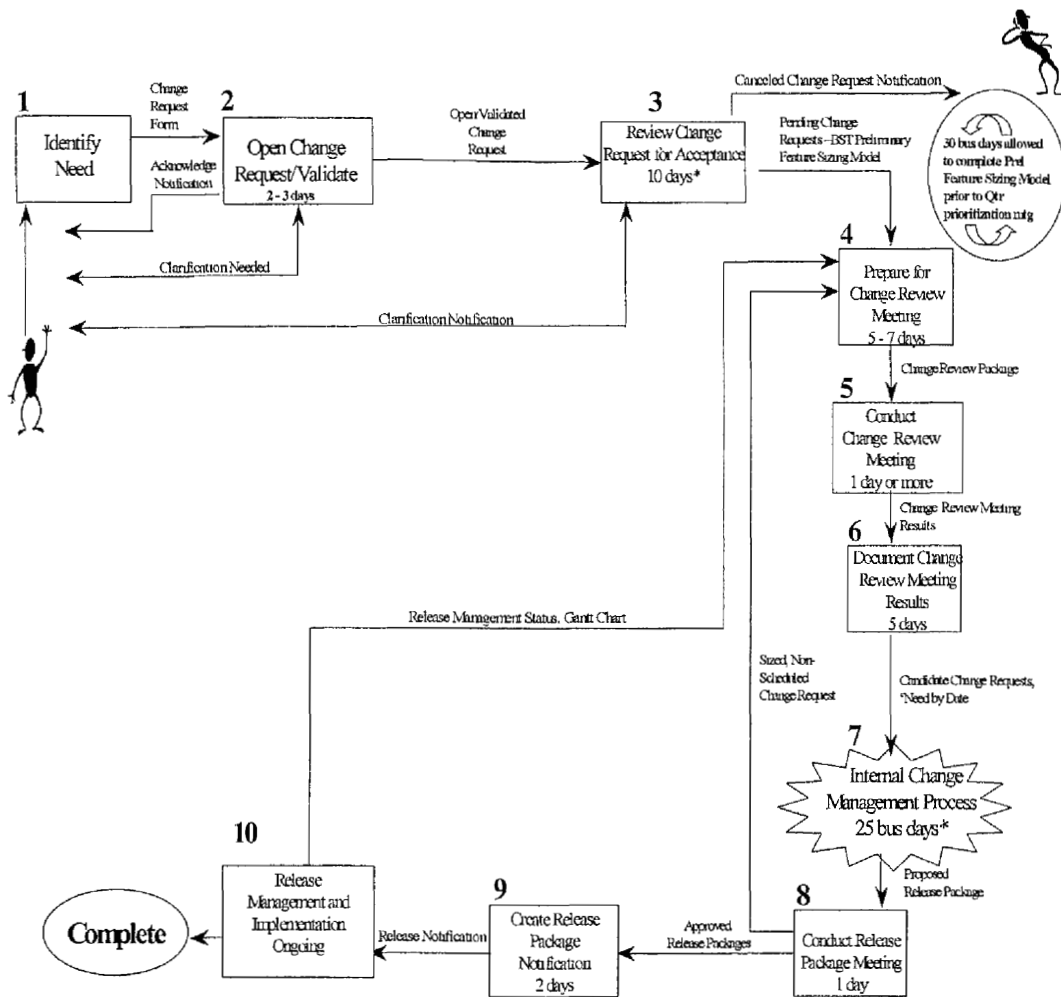
NOTE: A log of all outages will be posted to the CCP website on a monthly basis.

STEP 6	
Accountability:	CLEC Change Control Manager (CCCM), Electronic Communications System Support (ECS)
Sub-Processes/Activities	ESCALATION 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 – Escalation Process documented in Section 8.
INPUTS	<ul style="list-style-type: none"> • Information or concern relating to a Type 1 – System Outage
OUTPUTS	<ul style="list-style-type: none"> • Documented Escalation • Escalation Response
CYCLE TIME	> 3 Days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable)

Part 2: Types 2 – 5 Process Flow

Figure 4-3: Change Control Process Flow (Types 2-5)

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



*FL-PSC-Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

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

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

STEP 1	
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)
Sub-Processes/Activities	<p>IDENTIFY NEED</p> <ol style="list-style-type: none"> 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via email to BellSouth.
INPUTS	<ul style="list-style-type: none"> • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A)
OUTPUTS	<ul style="list-style-type: none"> • Completed Change Request Form with related documentation
CYCLE TIME	N/A

STEP 2	
Accountability:	BellSouth Change Control Manager (BCCM)
Sub-Processes/ Activities	<p>OPEN CHANGE REQUEST/ VALIDATE CHANGE REQUEST FOR COMPLETENESS</p> <ol style="list-style-type: none"> 1. Log Request in Change Request Log. 2. Send Acknowledgment Notification (Attachment A-3) via email to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. <p>CLEC or BellSouth Originator If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2)</p>
INPUTS	<ul style="list-style-type: none"> • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response
OUTPUTS	<ul style="list-style-type: none"> • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via email and web posting
CYCLE TIME	2-3 Business Days Clarification times would be in addition to cycle time.

STEP 3	
Accountability:	BellSouth Change Control Manager (BCCM)
Sub-Processes/ Activities	<p>REVIEW CHANGE REQUEST FOR ACCEPTANCE</p> <p>1. Review Change Request and related information for content.</p> <p>2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts.</p> <p>3. Determine status of request:</p> <ul style="list-style-type: none"> • If change already exists or is a CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to "C" for Request Canceled or "CT" for Training. If Training issue, refer to CSM or CLEC Care Organization. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. <p>NOTE: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions.</p> <p>BellSouth may determine that a CLEC initiated change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. In such cases, BellSouth's reason will be provided in writing on the updated change request and the appropriate BellSouth SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community.</p>
INPUTS	<ul style="list-style-type: none"> • New Change Request • Validated Change Request • Clarification Notification (if required)
OUTPUTS	<ul style="list-style-type: none"> • Pending Change Request • Clarification Notification (if applicable) • Cancellation Notification (if applicable) • CR status updated on web
CYCLE TIME	10 Business Days ^b

NOTE: There is a 30 business day process operating in parallel between steps 3 and 4 of this process in which BellSouth completes its preliminary feature sizing model on pending change requests.

⁶ FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

STEP 4	
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)
Sub-Processes/Activities	<p>PREPARE FOR CHANGE REVIEW MEETING</p> <p>NOTE: These activities take place to prepare for Change Review meetings when prioritization takes place.</p> <p>(BCCM) 1. Prepare an agenda.</p> <p>(BCCM) 2. Make meeting preparations.</p> <p>(BCCM) 3. Update Change Request Log with current status for new and existing Change Requests.</p> <p>(BCCM) 4. Prepare and post Change Request Log to web.</p> <p>(BCCM) 5. Provide Preliminary Feature Sizing Model and scope information on each pending change request and all future releases to CLECs. This sizing is expressed in "units" with a unit being equal to 100 release cycle hours. A release cycle hour is the total number of hours estimated for planning, analysis, design, code development, testing, and implementation of a single CR. Appendix I-A will be used to provide future release capacity sizing information. BST: BellSouth recommends as an alternative: BellSouth agrees to providing preliminary feature sizing model and scope information on each pending Type 4 and 5 change request. This sizing is expressed in "units" with a unit being equal to 100 release cycle hours. A release cycle hour is the total number of hours estimated for planning, analysis, design, code development, testing, and implementation of a single CR. BellSouth will also provide, annually, the estimated capacity for each production and/or industry releases planned for the following year. Appendix I-B will be used to provide this annual view.</p> <p>(CCCM) 1. Analyze Pending Change Requests</p> <p>(CCCM) 2. Determine priorities for change requests and establish "Desired/Want" dates.</p> <p>(CCCM) 3. Create draft Priority List to prepare for Change Review Meeting.</p> <p>The sizing information provided with the Change Review Meeting package is a preliminary estimate of the work effort. After prioritization, each interface is assessed in depth to determine the scope of the change request. Based on the assessment, an adjustment in the sizing may be required.</p> <p>CLECs will be notified of release capacity units and units assigned per CR. BST: CLECs will be notified of release capacity units and units assigned per Type 4 and 5 CRs as outlined in BCCMRS.</p>

INPUTS	<ul style="list-style-type: none"> • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log • BST Preliminary Feature Sizing Model and full release capacity. BST: BellSouth will also provide annually the estimated capacity for each production and/or industry releases planned for the following year. Appendix I-B will be used to provide this annual view.
OUTPUTS	<ul style="list-style-type: none"> • Change Request Log • CLEC Draft Priority List • (CLECs) Provide BST Preliminary Feature Sizing Model and scope information on each Pending change request and all future releases to CLECs. BST: BellSouth recommends as an alternative: BellSouth will also provide, annually, the estimated capacity for each production and/or industry releases planned for the following year. Appendix I-B will be used to provide this annual view.
CYCLE TIME	5-7 Business Days

STEP 5		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/Activities	CONDUCT CHANGE REVIEW MEETING	<p>MONTHLY STATUS MEETINGS</p> <ol style="list-style-type: none"> 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects and expedited features) at monthly status meeting. 3. Review current Release Management statuses. 4. Review issues and action items and assign owners. 5. Present new change requests submitted since previous Monthly Status Meeting. <p>PRIORITIZATION MEETINGS for CLEC Production Releases (Held quarterly in March, June, September and December, i.e. dependant on whether a CLEC Production Release is available for prioritization)</p> <ol style="list-style-type: none"> 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. BellSouth presents the preliminary feature sizing model and scope of each change request. See Appendix H for information to be provided. BellSouth presents the number of production releases and dates targeted for the (CLECs)

<p>remainder of the current and next calendar year next 12 months. (CLECs) BellSouth presents the total capacity (units) of each release and the capacity available (units) for the implementation of the change requests. BST: BellSouth recommends as an alternative: BellSouth presents the preliminary sizing model (units) and scope of each Type 4 and 5 change request. See Appendix H for information to be provided. BellSouth presents the number of production releases, estimated capacity for each release and dates targeted for the next 12 months.</p>
<p>4. Discuss impacts.</p>
<p>5. Prioritize Change Requests.</p>
<p>6. Develop final Candidate Requests list of Pending Change Requests by category, "Need by Dates" and (CLECs) by Release number based on Release capacity and prioritized Change Requests. (CLECs) All release capacity not required to implement Type 2, Type 3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence. BST: BellSouth recommends as an alternative: Develop final Candidate Request list of Pending Change Requests by category, "Need by Dates" and prioritized Change Requests for the CLEC Production Release being scoped. The CLEC's prioritization will be used for order of implementation into this CLEC Production Release. If for any reason, the order of implementation requested by the CLECs cannot be met (e.g., technical constraint), BellSouth will provide rationale.</p>
<p>7. Update Change Request Log to "RC" for Candidate Request List, "C" for Canceled, "P" for Pending, as appropriate.</p>
<p>8. Review issues and action items and assign owners.</p>

INPUTS	<ul style="list-style-type: none"> • Change Request Log • CLEC Draft Priority List • Desired/Want dates • Impact analysis • (CLECs) Provide Preliminary feature sizing model and scope information on each pending change request and all future releases to CLECs. BST: BellSouth will also provide annually the estimated capacity for each production and/or industry releases for the following year. Appendix I-B will be used to provide this annual view.
OUTPUTS	<ul style="list-style-type: none"> • Meeting minutes • Updated Change Request Log • Candidate Change Request List • (CLECs) Assignment of Candidate Change Requests to future releases. BST: Refer to Step 5, Activity #6 for BellSouth's recommended alternative. • Issues and Action Items (if required)
CYCLE TIME	1 Business Day (or as needed based on volume) Meeting Day

STEP 6		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/Activities	DOCUMENT CHANGE REVIEW MEETING RESULTS	1. Prepare and distribute outputs from Step 5.
	INPUTS	<ul style="list-style-type: none"> • Change Request Log • Final Candidate Request List • (CLECs) Prioritized Assignments to Future Releases BST: Refer to Step 5, Activity #6 for BellSouth's recommended alternative.
	OUTPUTS	<ul style="list-style-type: none"> • Updated Change Request Log • Web posting of meeting output
	CYCLE TIME	5 Business Days

STEP 7		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM), (CLECs) Designated CLEC Co-moderator (DCCoM) BST: BellSouth does not support for the reasons set forth in Section 2.0.	
Sub-Processes/Activities	INTERNAL CHANGE MANAGEMENT PROCESS	1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Candidate Change Requests. This ensures that participating parties are reviewing capacity and impacts to schedules before

- assigning resources to activities.
2. (CLECs) No BellSouth initiated Change Request may be input to Step 7 without first being subject to Step 5 of this process. BST: This step is not necessary since BellSouth will implement CLEC requested features in CLEC Production Releases as guided by the CLEC's prioritization.
 3. (CLECs) The DCCoM shall participate with the BCCM in BellSouth's internal process as co-moderator. BST: BellSouth still needs to conduct internal meetings to run its business.
 4. Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for the next CLEC Production release (CLECs) and all items have been targeted to a future release package. BST: BellSouth recommends keeping the current language and has included 'CLEC Production Release' to clarify which release is involved.

(CLECs) All release capacity not required to implement Type 2, Type 3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence. BST: BellSouth recommends as an alternative: Develop final Candidata Request list of Pending Change Requests by category, "Need by Dates" and prioritized Change Requests for the CLEC Production Release being scoped. The CLEC's prioritization will be used for order of implementation into this CLEC Production Release. If for any reason, the order of implementation by the CLECs cannot be met (e.g. technical constraint), BellSouth will provide rationale.

5. (CLECs) The implementation of Type 4 and Type 5 changes will occur within (no later than) 60 weeks from prioritization of the change, unless a Negotiated Extended Implementation Interval has been agreed to. BST: BellSouth recommends the following alternative: The implementation of Type 4 and Type 5 changes will occur within (no later than) 60 weeks from prioritization of the change, subject to available capacity. (CLECs) Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the various software releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative anticipated work effort required. BST: BellSouth recommends the following alternative: Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the CLEC Production Releases that will occur during the 60-week interval subject to available capacity. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing

	information provides the relative estimated anticipated work effort required.
INPUTS	<ul style="list-style-type: none"> • Candidate Change Request List with agreed upon "Need by Dates" • Change Request Log
OUTPUTS	<ul style="list-style-type: none"> • BellSouth's Proposed Release Package • CLEC Analysis
CYCLE TIME	25 Business Days ⁷

STEP 8			
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)		
Sub-Processes/Activities	<table border="1"> <tr> <td>CONDUCT RELEASE PACKAGE MEETING</td> <td> <ol style="list-style-type: none"> 1. Prepare Agenda 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. One CCP master prioritization list will be maintained. One month prior to each Change Review Meeting, CLEC/BST will determine the process for prioritizing change requests. Options include: <ul style="list-style-type: none"> • Prioritize all change requests (new pending and non-scheduled) • Prioritize only the new pending requests. An average ranking will be calculated and incorporated into the CCP master prioritization list. 5. Based on BST/CLEC consensus, create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the requests changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package. 6. Identify Release Management Project Manager. 7. Establish date for initial Release Management Project Meeting for the next new release. 8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". </td> </tr> </table>	CONDUCT RELEASE PACKAGE MEETING	<ol style="list-style-type: none"> 1. Prepare Agenda 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. One CCP master prioritization list will be maintained. One month prior to each Change Review Meeting, CLEC/BST will determine the process for prioritizing change requests. Options include: <ul style="list-style-type: none"> • Prioritize all change requests (new pending and non-scheduled) • Prioritize only the new pending requests. An average ranking will be calculated and incorporated into the CCP master prioritization list. 5. Based on BST/CLEC consensus, create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the requests changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package. 6. Identify Release Management Project Manager. 7. Establish date for initial Release Management Project Meeting for the next new release. 8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".
CONDUCT RELEASE PACKAGE MEETING	<ol style="list-style-type: none"> 1. Prepare Agenda 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. One CCP master prioritization list will be maintained. One month prior to each Change Review Meeting, CLEC/BST will determine the process for prioritizing change requests. Options include: <ul style="list-style-type: none"> • Prioritize all change requests (new pending and non-scheduled) • Prioritize only the new pending requests. An average ranking will be calculated and incorporated into the CCP master prioritization list. 5. Based on BST/CLEC consensus, create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the requests changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package. 6. Identify Release Management Project Manager. 7. Establish date for initial Release Management Project Meeting for the next new release. 8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". 		

⁷ FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

INPUTS	<ul style="list-style-type: none"> BellSouth's Proposed Release Package BellSouth's Release Schedule Change Request Log CLEC Analysis
OUTPUTS	<ul style="list-style-type: none"> Approved Release Package Updated Change Request Log Meeting Minutes Scheduled Change Requests Date for initial Release Management Project Meeting for next new release.
CYCLE TIME	1 Business Day Major Release Meeting held 36 weeks prior to production. Minor Release Meeting held 19 weeks prior to production (if applicable).

STEP 9

Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/Activities	CREATE RELEASE PACKAGE NOTIFICATION	1. Develop and distribute Release Notification Package via web.
INPUTS	<ul style="list-style-type: none"> Approved Release Package 	
OUTPUTS	<ul style="list-style-type: none"> Release Package Notification 	
CYCLE TIME	2 Business Days after Release Package Meeting	

STEP 10

Accountability:	BellSouth Change Control Manager (BCCM) and Project Managers from each participating company	
Sub-Processes/Activities	RELEASE MANAGEMENT AND IMPLEMENTATION	<ol style="list-style-type: none"> Provide Project Management and Implementation of Release (See Release Management @ Appendix B). Lead Project Manager communicates Release Management Project status to BCCM and CCM. Software Release Notifications will be provided 30 calendar days or more in advance of the implementation date. BellSouth User Requirements for software changes will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined.
Production Releases		

- Draft User Requirements for production software releases will be provided to the CLECs at least 36 weeks prior to production.
- Final User Requirements for production software releases will be provided to the CLECs at least 34 weeks prior to production. (CLECs) The estimated units of effort will be provided. BST: Estimated units of effort is provided via Appendix H during the prioritization step.
- Final specifications (EDI specs and TAG API) for production software releases will be provided to the CLECs at least 10 weeks prior to production.
- The business rules associated with production software releases will be provided to the CLECs at least 8 weeks prior to production.

Industry Releases

- Notification for the implementation of an Industry release will be provided at least 42 weeks prior to production.
- Draft User requirements for the implementation of an Industry Release will be provided to CLECs at least 40 weeks prior to production.
- Final User requirements for the implementation of an Industry release will be provided to CLECs at least 35 weeks prior to production. (CLECs) The estimated units of effort will be provided. BST: Estimated units of effort is provided via Appendix H during the prioritization step.
- Final specifications (EDI specs and TAG API) for the implementation of an Industry release will be provided to the CLECs at least 10 weeks prior to production.
- Business rules associated with the implementation of an Industry release will be provided to CLECS at least 8 weeks prior to production.

5. BellSouth Documentation changes, including business rule changes, will be provided.
 - All non-system impacting changes to BellSouth business rule documentation will be provided to CLECs at least 30 calendar days in advance of the effective date (excluding expedites/defects).
6. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.

INPUTS	<ul style="list-style-type: none"> • Approved Release Package Notification
OUTPUTS	<ul style="list-style-type: none"> • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc. • Implemented Change Request • Draft User Requirements • Final User Requirements • Documentation Changes • Final Specifications
CYCLE TIME	Ongoing

Part 3: Expedited Feature Process

(CLECs) Part 3: Exception Feature Process (BST) BellSouth does not support)

Definition

(CLECs) Situations may arise from time to time that require exception treatment for Type 2-5 changes or a Type 6 Defect change that has been reclassified as a feature change request. An exception may involve an Expedited Feature, a Re-classified Defect, or a Negotiated Extended Implementation.

Expedited Feature

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

- A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact

- An enhancement to an existing interface where the CLEC/BellSouth (CLECs) and the CCP participants have determined should be expedited due to impact. BST: BellSouth recommends as an alternative: An enhancement to an existing interface where the CLECs have determined should be expedited due to impact. Applicable to CLEC Production Releases.

Re-Classified Defects

When a submitted defect is re-classified as a feature, the CLEC/BellSouth will be notified by Change Control in the defect validation. The CLEC will have the ability to ask BellSouth to expedite the re-classified feature by updating the Change Request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 Expedited Feature process using agreed upon intervals.

(CLECs) Negotiated Extended Implementation

The CLECs and BellSouth collectively may determine that an individual or group of normally prioritized change requests should not be implemented within the normal 60-week interval. A negotiated extended implementation may be requested. As each situation will likely be unique, this process provides the framework in which the CCP member will make the necessary consensus decisions to achieve a negotiated implementation. See Figure 4-X for high-level process overview.
BellSouth recommends as an alternative: BellSouth does not support inclusion of this paragraph.

Enhancement to an existing interface

A CLEC/BellSouth will also have the ability to submit a Type 2-5 change request as an expedited feature request for an enhancement to an existing interface where the functionality does not currently exist in BellSouth's offered interface.

For both re-classified defects and enhancements to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing interface
- Will follow the Expedited Feature Process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current or next release, best effort.
- **(CLECs) If granted expedited status by the consensus of the CCP participants at the next monthly status meeting. This consensus will be obtained in parallel with the activities within Steps 3 and 4 and will only impact the process in those cases where the CCP participants do not concur. BST: BellSouth recommends as an alternative: Applicable for CLEC Production Releases.**

(CLECs) Figure 4-X: Process Flow for Types 2-5 Negotiated Extended Implementation Feature Process (BST) BellSouth does not support inclusion of this Flow.

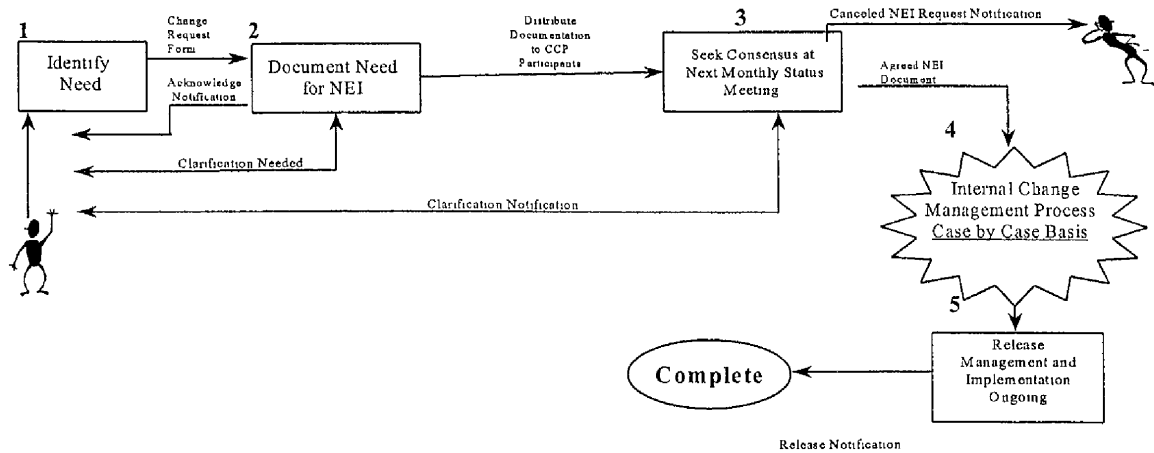
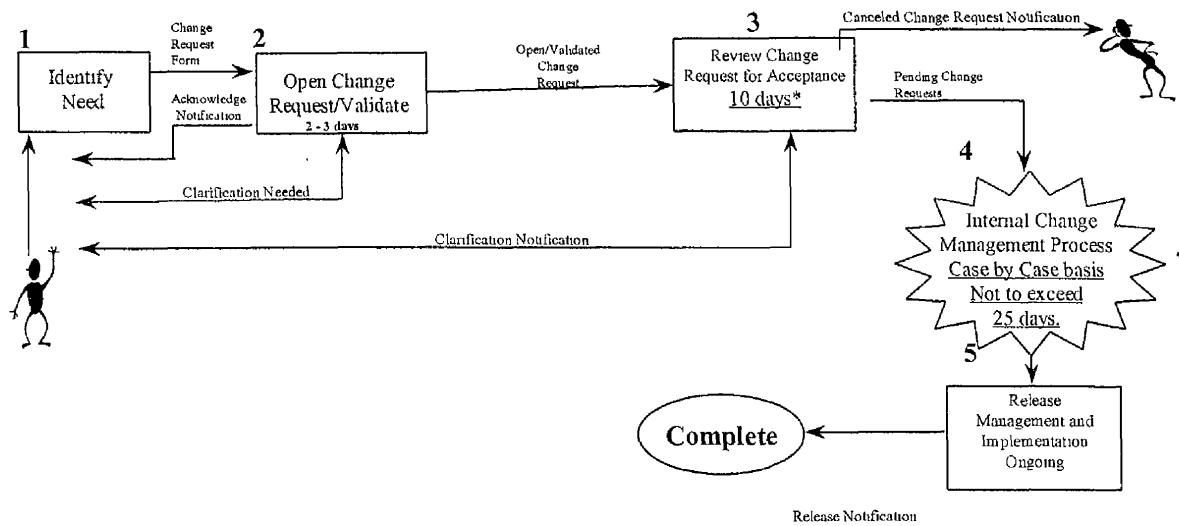


Figure 4-4: Process Flow for Types 2-5 Expedited Feature Process



* FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-T

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

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Expedited Feature process. Steps shown in the table are sequential unless otherwise indicated.

STEP 1									
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)								
Sub-Processes/Activities	<table border="1"> <tr> <td>IDENTIFY NEED</td> <td> <ol style="list-style-type: none"> Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) Appropriate CCCM/BCCM submits Change Request Form and related information via email to BellSouth. </td> </tr> <tr> <td>INPUTS</td> <td> <ul style="list-style-type: none"> Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) </td> </tr> <tr> <td>OUTPUTS</td> <td> <ul style="list-style-type: none"> Completed Change Request Form with related documentation </td> </tr> <tr> <td>CYCLE TIME</td> <td>N/A</td> </tr> </table>	IDENTIFY NEED	<ol style="list-style-type: none"> Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) Appropriate CCCM/BCCM submits Change Request Form and related information via email to BellSouth. 	INPUTS	<ul style="list-style-type: none"> Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) 	OUTPUTS	<ul style="list-style-type: none"> Completed Change Request Form with related documentation 	CYCLE TIME	N/A
IDENTIFY NEED	<ol style="list-style-type: none"> Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) Appropriate CCCM/BCCM submits Change Request Form and related information via email to BellSouth. 								
INPUTS	<ul style="list-style-type: none"> Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) 								
OUTPUTS	<ul style="list-style-type: none"> Completed Change Request Form with related documentation 								
CYCLE TIME	N/A								

STEP 2	
Accountability:	BellSouth Change Control Manager (BCCM)

Sub-Processes/ Activities	OPEN CHANGE REQUEST/ VALIDATE CHANGE REQUEST FOR COMPLETENESS	1. Log Request in Change Request Log.
		5. Send Acknowledgment Notification (Attachment A-3) via email to originator.
		6. Establish request status ('N' for New Request)
		7. Review change request for mandatory fields using the Change Request Form Checklist.
		8. Verify Change Request specifications and related information exists.
		9. Send Clarification Notification via email to the originator (Attachment A-4) if needed.
		10. Update Change Request Status to "PC" for Pending Clarification if clarification is needed.
		CLEC or BellSouth Originator If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2)
	INPUTS	<ul style="list-style-type: none"> Completed Change Request Form with related documentation Change Request Form Checklist Change Request Clarification Response
	OUTPUTS	<ul style="list-style-type: none"> New Change Request Acknowledgment Notification Validated Change Request Clarification Notification Industry Notification via email and web posting
CYCLE TIME	1 Business Day Clarification times would be in addition to cycle time.	

STEP 3		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	REVIEW CHANGE REQUEST FOR ACCEPTANCE	1. Review Change Request and related information for content.
		2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts.

3. Determine status of request:
- If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to "C" for Request Canceled or "CT" for Training. If Training issue, refer to CSM or CLEC Care Organization.
 - If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed.
 - If request is accepted, update Change Request status to "P" for Pending in Change Request Log.
 - If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow, Step 4.

NOTE: See Section 11.0 Terms and Definitions– Change Request Status for valid status codes and descriptions.

BellSouth may determine that a CLEC initiated expedited change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. In such cases, BellSouth's reason will be provided in writing on the updated change request and the appropriate BellSouth SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community.

INPUTS	<ul style="list-style-type: none"> • New Change Request • Validated Change Request • Clarification Notification (if required)
OUTPUTS	<ul style="list-style-type: none"> • Validated Expedited Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web
CYCLE TIME	10 Business Days ⁸

STEP 3a	
Accountability:	BellSouth Change Control Manager (BCCM)
Sub-Processes/ Activities	<p>REVIEW CHANGE REQUEST FOR ACCEPTANCE</p> <p>1. Change requests validated in Step 2 above shall be considered for expedited status by the CCP participants at the next Monthly Status Meeting. Requests granted expedited status by the consensus of the participants will continue through Step 4 and 5 to implementation. If the request is not granted expedited status it will exit this process and enter the standard Types 2-5 flow, Step 4. (BST) BellSouth recommends as an alternative: Change requests validated in Step 2 above shall be considered for expedited status into the next CLEC Production Release by the CCP participants at the next Monthly Status Meeting. Requests granted expedited status by the consensus of the</p>

⁸ FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

		participants will continue through Step 4 and 5 to implementation. If the request is not granted expedited status, it will exit this process and enter the standard Types 2-5 flow, Step 4.
		2. If request does not receive expedited feature status, it will exit this process and enter the standard Types 2-5 flow, Step 4.
		3. This step will occur in parallel to the activities in Steps 3 and 4 and will only impact the process in those cases where the CCP participants do not concur.
	INPUTS	<ul style="list-style-type: none"> • New Change Request • Validated Change Request
	OUTPUTS	<ul style="list-style-type: none"> • Validated Expedited Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web
	CYCLE TIME	Next Monthly Status Meeting following Validation in Step 2

STEP 4		
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)	
Sub-Processes/Activities	INTERNAL CHANGE MANAGEMENT PROCESS	<ol style="list-style-type: none"> 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. The DCCoM shall participate with the BCCM in BellSouth's internal process as co-moderator. BST: BellSouth does not support this language for the reasons set forth in Section 2.0. <p>Expedited Features will be implemented in the current or next CLEC Production Release, best effort.</p>
	INPUTS	<ul style="list-style-type: none"> • Change Request Log
	OUTPUTS	<ul style="list-style-type: none"> • Release Date for Expedited Feature
	CYCLE TIME	Case by Case basis – Not to exceed 25 days

STEP 5		
Accountability:	BellSouth Change Control Manager (BCCM) and Project Managers from each participating company	
Sub-Processes/Activities	RELEASE MANAGEMENT AND IMPLEMENTATION	<ol style="list-style-type: none"> 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B).

2. Lead Project Manager communicates Release Management Project status to BCCM and CCCM.
3. BellSouth User Requirements for software changes will be presented to CLECs if applicable. If needed, changes will be incorporated and requirements re-baselined.
4. BellSouth Documentation changes, including business rules changes associated with expedited features, will be provided, if applicable.
5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.

INPUTS	<ul style="list-style-type: none"> • Approved Release Package Notification
OUTPUTS	<ul style="list-style-type: none"> • Project Release Status • Implementation Date • Documentation Changes
CYCLE TIME	Ongoing

5.0 DEFECT PROCESS

Definition

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

A Type 6 defect request is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect. **BST New Proposal to replace paragraph 3: If functional requirements agreed upon by BellSouth and the CLECs, do not result in the expected outcome and new user requirements and/or business rules are required, then this change request is not classified as a defect (i.e., Type 6) but rather a Type 4 (BST initiated) or Type 5 (CLEC initiated). It will follow normal process for implementing as a Type 4 or 5.**

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature (See Documentation Defect – Sub section 5-2). Type 6 validated defects may not be managed using the Expedited Feature Process discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels (excluding documentation defects):

- **High Impact**

The failure causes impairment of critical system functions and no electronic workaround solution exists. Correction of high impact defects will occur within 10 business days following the date upon which BellSouth's defect validation process is scheduled to complete.

- **Medium Impact**

The failure causes impairment of critical system functions, though a workaround solution does exist. **CLECs: Correction of medium impact defects will occur within 20 business days following the date upon which BellSouth's defect validation process is scheduled to complete. The implementation of a workaround solution does not constitute correction of a medium impact defect. BST: BellSouth recommends as an alternative: Correction of medium impact defects will occur within 45 business days or the next available maintenance release following the date upon which**

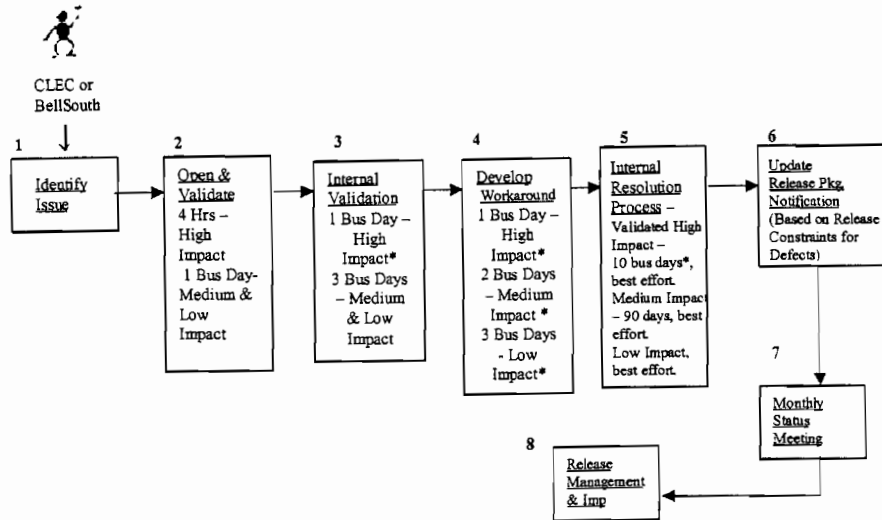
BellSouth's defect validation process is scheduled to complete. The implementation of a workaround solution does not constitute correction of a medium impact defect. NOTE: The 45 business day interval is contingent upon approval of BellSouth's proposed new language in the 3rd paragraph of the Section 5.0 Defect definition.

- **Low Impact**

The failure causes inconvenience or annoyance.

CLECs: This reduces the efficiency of CLEC operations, increases CLEC operating costs, and introduces delay and impacts CLEC customer service performance. Correction of low impact defects will occur within 30 business days following the date upon which BellSouth's defect validation process is scheduled to complete. **BST:** BellSouth recommends as an alternative: Correction of low impact defects will occur within 60 business days. NOTE: The 60 business day interval is contingent upon approval of BellSouth's proposed new language in the 3rd paragraph of the Section 5.0 Defect definition.

Figure 5-1: Type 6 Process Flow
Validation and Resolution of a Type 6 Change – CLEC impacting Defect (excluding documentation) NOTE: Flowchart will be updated to reflect agreed upon language.



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

* FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

Table 5-1: Type 6 Detail Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated (This table excludes documentation defects which are detailed in a separate Section 5-2).

STEP 1	
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)
Sub-Processes/Activities	<p>IDENTIFY NEED</p> <ol style="list-style-type: none"> 1. Identify Defect. 3. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 4. Include description of business need and details of business impact. 5. Attach related requirements and specification documents. These attachments must include the following, if appropriate: <ul style="list-style-type: none"> • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 6. Appropriate CCCM/BCCM submits Change Request Form and related information via email to BellSouth Change Management Team.
INPUTS	<ul style="list-style-type: none"> • Type 6 Change Request
OUTPUTS	<ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary)
CYCLE TIME	N/A

STEP 2	
Accountability:	BellSouth Change Control Manager (BCCM)
Sub-Processes/ Activities	<p>OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS</p> <ol style="list-style-type: none"> 1. Log Defect in Change Request Log 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ("N" for New Defect) 4. BCCM reviews change request for mandatory fields using the Change Request Form checklist. 5. Verify specifications and related information exist. 7. Send Clarification Notification via email to the originator if needed. 8. Update CR Status to 'PC' for Pending Clarification if clarification is needed. <p>If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.</p>
INPUTS	<ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary)
OUTPUTS	<ul style="list-style-type: none"> • New Defect • Acknowledgment Notification • Clarification Notification (if required)
CYCLE TIME	<p>4 Hours – High Impact 1 Business Day – Medium & Low Impact (Time to be calculated from time of receipt with a cutoff time of 4:00 pm Eastern Time)</p>

STEP 3			
Accountability:	BellSouth Change Control Manager (BCCM)		
Sub-Processes/ Activities	<table border="1"> <tr> <td>INTERNAL VALIDATION</td> <td> <ol style="list-style-type: none"> 1. Validate that it is a defect. 2. Perform internal defect analysis. 3. Determine status of request: <ul style="list-style-type: none"> • If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to "C" for Request Canceled or "CT" for Training. If Training issue, refer to CSM or CLEC Care Organization. • Send Clarification Notification via email if needed and update status to "PC" for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status "V" for Validated Defect and indicate appropriate Impact Level. • If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. • If the process is operating as specified in the baseline requirements and published business rules, the BCCM will communicate the results via email to the originator to discuss/determine the next step(s). • If issue is re-classified as a feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3) <p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect Notification will be provided to CLEC community via email and web posting.</p> </td> </tr> </table>	INTERNAL VALIDATION	<ol style="list-style-type: none"> 1. Validate that it is a defect. 2. Perform internal defect analysis. 3. Determine status of request: <ul style="list-style-type: none"> • If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to "C" for Request Canceled or "CT" for Training. If Training issue, refer to CSM or CLEC Care Organization. • Send Clarification Notification via email if needed and update status to "PC" for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status "V" for Validated Defect and indicate appropriate Impact Level. • If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. • If the process is operating as specified in the baseline requirements and published business rules, the BCCM will communicate the results via email to the originator to discuss/determine the next step(s). • If issue is re-classified as a feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3) <p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect Notification will be provided to CLEC community via email and web posting.</p>
INTERNAL VALIDATION	<ol style="list-style-type: none"> 1. Validate that it is a defect. 2. Perform internal defect analysis. 3. Determine status of request: <ul style="list-style-type: none"> • If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to "C" for Request Canceled or "CT" for Training. If Training issue, refer to CSM or CLEC Care Organization. • Send Clarification Notification via email if needed and update status to "PC" for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status "V" for Validated Defect and indicate appropriate Impact Level. • If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. • If the process is operating as specified in the baseline requirements and published business rules, the BCCM will communicate the results via email to the originator to discuss/determine the next step(s). • If issue is re-classified as a feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3) <p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect Notification will be provided to CLEC community via email and web posting.</p>		

INPUTS	<ul style="list-style-type: none"> New Defect
OUTPUTS	<ul style="list-style-type: none"> Validated Defect Defect notification to CLEC community via email and web posting Clarification Notification (if required) Cancellation Notification (if required) Status provided for High Impact Defects to originator via email within 24 hours
CYCLE TIME	<p>1 Business Day – High Impact⁹ (If BellSouth cannot complete internal validation of a High Impact defect within 1 bus day, BST will communicate the reason and expected time period in which the defect validation can occur to both the originator and the CLECs)</p> <p>3 Business Days – Medium and Low Impact</p>

STEP 4	
Accountability:	BellSouth Change Control Manager (BCCM)
Sub-Processes/Activities	<p>DEVELOP & VALIDATE WORKAROUND (IF APPLICABLE)</p> <ol style="list-style-type: none"> Defect Workaround identified. Change Request status changed to “W” for workaround identified. Workaround is communicated via email to originating CLEC and to the CLEC community via email and web posting. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. <p>If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via email and web posting.</p>

⁹ FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

INPUTS	<ul style="list-style-type: none"> Validated Defect Clarification Notification (if required)
OUTPUTS	<ul style="list-style-type: none"> Workaround (if applicable) Clarification Notification (if required) Cancellation Notification (if required) Email and web posting of workaround
CYCLE TIME	1 Business Day – High Impact ¹⁰ 2 Business Days – Medium Impact ¹¹ 3 Business Days – Low Impact

STEP 5		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	INTERNAL RESOLUTION PROCESS	<ol style="list-style-type: none"> Schedule and evaluate Defects based on capacity and business impacts to the CLECs and BellSouth. Provide status updates to the CLEC community via email as the status changes until the defect is implemented.

¹⁰ FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

¹¹ FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

INPUTS	<ul style="list-style-type: none"> • CLEC/BST input
OUTPUTS	<ul style="list-style-type: none"> • Defect Release Schedule
CYCLE TIME	<ul style="list-style-type: none"> • Validated High Impact Defects will be implemented within a 10 business day range, best effort¹². (BST will be required to have daily discussions with the originating CLEC and provide daily updates to other impacted CLECs. If BST is unable to correct a high impact defect in 10 business days, it must notify the designated CLEC and notify all impacted parties) • Medium Impact Defects will be implemented within 90 (CLECs) 20 business days, best effort. CLECs: BST will be required to have weekly discussions with the originating CLEC and provide weekly updates to other impacted CLECs. If BST is unable to correct a Medium Impact defect in 20 business days, it must notify the designated CLEC and notify all impacted parties. BST: BellSouth recommends as an alternative: The correction of validated medium defects will be implemented within 45 business days or the next available maintenance release. If BST is unable to correct a Medium impact defect within 45 business day or the next available maintenance release, it must notify the designated CLEC and notify all impacted parties. NOTE: The 45 business day interval is contingent upon approval of BellSouth's proposed new language in the 3rd paragraph of the Section 5.0 Defect definition. • Low Impact Defects will be implemented (CLECs) within 30 business days, best effort. CLECs: If BST is unable to correct a Low Impact defect in 30 business days, it must notify the designated CLEC and notify all impacted parties. BST: BellSouth recommends as an alternative: The correction of low impact defects will occur within 60 business days. NOTE: The 60 business day interval is contingent upon approval of BellSouth's proposed new language in the 3rd paragraph of the Section 5.0 Defect definition.

¹² FL-PSC Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP

STEP 6		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	UPDATE RELEASE PACKAGE NOTIFICATION	<ol style="list-style-type: none"> 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". <p>NOTE: The release notification will be published in a timely manner, based on the release constraints associated with the defect.</p> <p>NOTE: In the event correction of the defect may potentially cause the CLECs to perform coding or business procedure changes, BellSouth will provide notification and appropriate documentation with the release notification.</p>
INPUTS	<ul style="list-style-type: none"> • Defect Information 	
OUTPUTS	<ul style="list-style-type: none"> • Updated Release Package Notification • Scheduled Change Request • Documentation of potential CLEC coding/process changes. 	
CYCLE TIME	Based on release constraints for defects (may be less than 30 days)	

STEP 7		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	MONTHLY STATUS MEETING	<ol style="list-style-type: none"> 1. Provide status of defect. 2. Solicit CLEC/BST input. 3. Update Defect information as needed.
INPUTS	<ul style="list-style-type: none"> • Defects Received • Change Request Log • Defect Analysis • Workaround (if applicable) 	
OUTPUTS	<ul style="list-style-type: none"> • Updated status • Updated Change Request Log • Meeting minutes 	
CYCLE TIME	Monthly or when status changes, whichever occurs first.	

STEP 8	
Accountability:	BellSouth Change Control Manager (BCCM)
Sub-Processes/ Activities	<p>RELEASE MANAGEMENT AND IMPLEMENTATION</p> <p>The following release management activities will pertain to Type 6 changes:</p> <ol style="list-style-type: none"> 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 2. Once a defect is implemented in a release, the status will be changed to "I" for Change Implemented.
INPUTS	<ul style="list-style-type: none"> • Approved Release Package Notification
OUTPUTS	<ul style="list-style-type: none"> • Project Release status • Implementation Date • Implemented Change Request
CYCLE TIME	Ongoing

Table 5-2: Type 6 Detail Process Flow – Documentation Defects

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

STEP 1	
Accountability:	CLEC Change Control Manager (CCCM), BellSouth Change Control Manager (BCCM)
Sub-Processes/Activities	<p><u>IDENTIFY NEED</u></p> <ol style="list-style-type: none"> 1. Identify Documentation Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents, if appropriate. 5. Appropriate CCCM/BCCM submits Change Request Form and related information via email to BellSouth Change Management Team.
INPUTS	<ul style="list-style-type: none"> • Type 6 Change Request
OUTPUTS	<ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary)
CYCLE TIME	N/A

STEP 2	
Accountability:	BellSouth Change Control Manager (BCCM)
Sub-Processes/Activities	<p><u>OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS</u></p> <ol style="list-style-type: none"> 1. Log Defect in Change Request Log 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ("N" for New Defect) 4. BCCM reviews change request for mandatory fields using the Change Request Form checklist. 5. Verify specifications and related information exists

INPUTS	<ul style="list-style-type: none"> Completed Change Request Form (with related documentation if necessary)
OUTPUTS	<ul style="list-style-type: none"> New Documentation Defect Acknowledgment Notification Clarification Notification (if required)
CYCLE TIME	1 Business Day

STEP 3					
Accountability:	BellSouth Change Control Manager (BCCM)				
Sub-Processes/ Activities	<table border="1"> <tr> <td>INTERNAL VALIDATION</td> <td> <ol style="list-style-type: none"> Validate that it is a documentation defect. Perform internal defect analysis. Determine status of request: <ul style="list-style-type: none"> If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to "C" for Request Canceled or "CT" for Training. If Training issue, refer to CSM or CLEC Care Organization. Send Clarification Notification via email if needed and update status to "PC" for Pending Clarification. If Change Request Clarification Notification not received back from CLEC, validate with CLEC that change request is no longer needed. If request is valid, update Change Request status to "V" for Validated Defect and indicate appropriate Impact Level. If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. If the documentation is correct, the BCCM will communicate the results via email to the originator to discuss/determine the next step(s). </td> </tr> <tr> <td colspan="2"> <p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect Notifications will be provided to CLEC community via email and web posting.</p> </td> </tr> </table>	INTERNAL VALIDATION	<ol style="list-style-type: none"> Validate that it is a documentation defect. Perform internal defect analysis. Determine status of request: <ul style="list-style-type: none"> If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to "C" for Request Canceled or "CT" for Training. If Training issue, refer to CSM or CLEC Care Organization. Send Clarification Notification via email if needed and update status to "PC" for Pending Clarification. If Change Request Clarification Notification not received back from CLEC, validate with CLEC that change request is no longer needed. If request is valid, update Change Request status to "V" for Validated Defect and indicate appropriate Impact Level. If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. If the documentation is correct, the BCCM will communicate the results via email to the originator to discuss/determine the next step(s). 	<p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect Notifications will be provided to CLEC community via email and web posting.</p>	
INTERNAL VALIDATION	<ol style="list-style-type: none"> Validate that it is a documentation defect. Perform internal defect analysis. Determine status of request: <ul style="list-style-type: none"> If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to "C" for Request Canceled or "CT" for Training. If Training issue, refer to CSM or CLEC Care Organization. Send Clarification Notification via email if needed and update status to "PC" for Pending Clarification. If Change Request Clarification Notification not received back from CLEC, validate with CLEC that change request is no longer needed. If request is valid, update Change Request status to "V" for Validated Defect and indicate appropriate Impact Level. If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. If the documentation is correct, the BCCM will communicate the results via email to the originator to discuss/determine the next step(s). 				
<p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect Notifications will be provided to CLEC community via email and web posting.</p>					
INPUTS	<ul style="list-style-type: none"> New Documentation Defect 				
OUTPUTS	<ul style="list-style-type: none"> Validated Documentation Defect Defect notification to CLEC community via email and web posting Clarification Notification (if required) Cancellation Notification (if required) 				
CYCLE TIME	3 Business Days				

STEP 4		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	DEVELOP & PROVIDE CARRIER NOTIFICATION "SUMMARY OF CHANGES"	<ol style="list-style-type: none"> 1. BellSouth prepares and validates the corrected documentation. 2. Carrier Notification "Summary of Changes" is developed. 3. Change Request status changed to "S" for scheduled. 4. Carrier Notification "Summary of Changes" is sent to BCCM via email for distribution to CLECs. <p>If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via email and web posting.</p>
INPUTS	<ul style="list-style-type: none"> • Validated Documentation Defect • Clarification Notification (if required) 	
OUTPUTS	<ul style="list-style-type: none"> • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • Email of "Summary of Changes" notification 	
CYCLE TIME	4 Business Days	

STEP 5		
Accountability:	BellSouth Change Control Manager (BCCM)	
Sub-Processes/ Activities	CARRIER NOTIFICATION LETTER	<ol style="list-style-type: none"> 1. BellSouth will develop an "official" Carrier Notification Letter. 2. Carrier Notification Letter is posted to the web.
INPUTS	<ul style="list-style-type: none"> • Carrier Notification "Summary of Changes" 	
OUTPUTS	<ul style="list-style-type: none"> • Carrier Notification Letter posted on web 	
CYCLE TIME	10 Business Days	

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT & APPROVAL

Part 1: Change Review Meeting

Definition

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLECs. Meetings will be structured according to category (pre-order/order, maintenance, manual and documentation, etc.). Prioritization meetings will be held quarterly.

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

The Change Request Log will be distributed 5-7 business days prior to the Change Review Meeting. Change Requests must be accepted and in “Pending” status at least 30 business days in advance of the distribution of the Change Review Package to assure completion of the preliminary feature sizing model. Other Change Requests, placed in pending status after the 30 business days cutoff will also be available for prioritization but may not have the preliminary feature sizing model information.

NOTE: Status Meetings will occur monthly. Prioritization meetings for CLEC Production Releases will be scheduled to occur in March, June, September and December, i.e. dependent on whether a CLEC Production Release is available for prioritization, and will include the monthly status meeting agenda items.

Part 2: Change Review Package

Definition

The Change Review Package will be distributed to all participants 5-7 business days prior to the Change Review Meeting. The package will include the following:

- Meeting Agenda
- Change Request Log (List of Change Requests to be reviewed)
- BellSouth’s Preliminary Feature Sizing Model and scope on each Change Request (See Appendix H for information to be provided)

• CLECs: BellSouth’s preliminary units estimate of: 1) feature release capacity available and 2) capacity assigned to known feature changes. BST:

BellSouth recommends as an alternative: Schedule of CLEC and BST Production Releases, Industry Releases, and Maintenance Releases and estimated size (i.e., total units and units available) of each. See Appendix I-B for information to be provided.

- Schedule of Releases and estimated size (i.e. total units and units available for each type of change. See Appendix I-A for information to be provided. BST: BellSouth recommends as an alternative: Addressed in bullet above. See Appendix I-B for information to be provided.
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams
- For prioritization and planning purposes, BellSouth will provide two views of a rolling release plan annually: 1) a view with an industry release (i.e., ELMSx), CLEC production release(s) and BST production release(s) and 2) a view with a CLEC production release(s) and BST production release(s) and no industry release. The CCP membership will vote on which rolling release plan will be implemented for the following year.¹³
- Total CLEC and BST production releases are equal in estimated number of units of capacity
- Prioritization of Type 5s and Type 4s (optional) within this process will be used for assigning priority order within the CLEC Production Releases.¹⁴
- Type 5s and Type 4s will be implemented into the CLEC Production Release being scoped for prioritization within 60 weeks of prioritization subject to available capacity.

¹³ A set number of maintenance releases will be provided as well. Maintenance releases are primarily intended for implementation of defects.

¹⁴ Type 4s and 5s (optional) will also be assigned to BST Production Releases outside of this process.

Part 3: Prioritizing Change Requests

Definition

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

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

PRIORITIZATION VOTING RULES

- CLEC must either be using an interface within a category (i.e., ordering), in the testing phase or have a letter of intent (LOI) on file with the BellSouth Change Control Management Team to participate in the voting process.
- One vote per CLEC, per category.
- No proxy voting
- Type 4 and 5 change requests will be prioritized (non-expedites)
- Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with 1 being the highest) will be used
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and documentation will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- In cases of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

REMOTE PRIORITIZATION VOTING RULES

- The ranking sheet, which lists the change requests to be prioritized, will be provided to the CLEC community via email 5-7 business days prior to the Change Review Meeting.
- Presentation of each change request to be prioritized will occur in the morning portion of the meeting.

- Change Management will verify which participants will be submitting their ranking sheets.
- CLECs must be present at the meeting (either via conference bridge or in person) to participate in the prioritization.
- Ranking sheets must be emailed to Change Control by Noon Eastern the day of prioritization meeting:

Change.Control@bridge.bellsouth.com

Fax Number: 205-321-5160 (if email is not working)

- Results will be tallied during the lunch break.
- The results of the ranking will be presented in the afternoon portion of the meeting.
- In case of a tie, the affected Changes will be re-ranked. Ranking sheets must be emailed to Change Control within one (1) hour after notification of a tie.

EXAMPLE:

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

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	1	6	10
E2	3	5	1	9 (#2)
E3	1	6	5	12
E4	4	3	3	10
E5	2	2	3	7 (#1)
E6	6	3	2	11

Part 4: Developing and Approving Release Packages

Definition

Subsequent to the Change Review Meeting, BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held as follows:

- Production Release – 36 weeks prior to production

Sizing and sequencing of change requests will be accomplished at the Prioritization meeting. CLECs may take into account the size and scope when prioritizing items.

During the Release Package Meeting, BellSouth will present its proposed release package for the next (CLECs) and any necessary additional release. BST: BellSouth recommends the following alternative: During the Release Package Meeting, BellSouth will present its proposed release package for the release being scoped and provide a planning view of remaining change requests that may be scheduled for the next CLEC production release(s).¹⁵

- (CLECs) BellSouth will develop several variations of release packages to include all prioritized requests.
- (CLECs) All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process. BST: BellSouth recommends as an alternative: BellSouth may develop several variations of release packages.

CLECs: All release capacity not required to implement Type 2, Type 3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence. BST: BellSouth recommends as an alternative: The CLEC's prioritization will be used for order of implementation into this CLEC Production Release. If for any reason, the order of implementation requested by the CLECs cannot be met (e.g. technical constraint), BellSouth will provide rationale.

CLEC/BST consensus will be used to create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CR's). BellSouth will evaluate and determine the impacts of the requested changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package.

¹⁵ Capacity estimates for change requests and releases will be used as a guide in determining how many change requests will be assigned to these releases.

(BST) Release Implementation Hierarchy¹⁶:

- Type 6s may be assigned to all releases in accordance with the defect implementation intervals
- Type 2s with a specific implementation date will be scheduled in accordance with that date and can be assigned to any production releases.
- Type 2s without a specific implementation date (i.e., flow through features) will take precedence over Type 4s and Type 5s and may be assigned to any¹⁷ production releases.
- Type 4s and Type 5s will be ranked in priority order in accordance with this process.

Monitoring and Reporting Post-Release Capacity Utilization

BellSouth will track the capacity per the above categories and provide a Year-To-Date (YTD) percent capacity used. This report will be provided at CCP on a quarterly basis, beginning with calendar year 2002. Appendix I provides the report format.

CLECs:

Part 5: Release Capacity Forecasting, Allocation, and Reporting

Forecast and Planning Information: In order to facilitate joint planning for long term development between BellSouth and CLECs and production support capacity plans, two OSS development forecasts and specifications will be shared. Each quarter, BellSouth will provide a release capacity forecast covering the remainder of the current calendar year and the following calendar year including high level estimates of when BellSouth intends to release, upgrade or retire its various operational support systems. At the same time and for the same period of time BellSouth will provide an outlook with high-level description of the items to be included in each upgrade release. Included in this outlook will be the size in units of the release capacity and the size in units of the capacity remaining within the release.

For Type 3 Industry changes, BellSouth will provide the preliminary feature sizing model at the beginning of the calendar year. The remaining annual capacity will be allocated according for the defined categories per the Change Control Process document.

All release capacity not required to implement Type 2, Type 3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC

¹⁶ Maintenance of the systems to ensure stability and performance requirements are met is understood to take highest priority. Network infrastructure changes will be planned for implementation in the BST production releases.

¹⁷ Estimated capacity for production releases is equal.

prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence.

Pre-Release Capacity

BellSouth will provide preliminary unit measurement estimates accompanying each change request that can be used by the CLECs during prioritization. BellSouth will provide the total number of units available for a specific release to be utilized as a tool for prioritization. Total number of units will be provided as follows:

Total Release Units

- Units required to perform release maintenance
- Units required to implement public switched network mandates such as NPA overlays and Number Pooling
- Units required to implement Type 6 Change Requests
- Units required to implement Type 2 Change Requests
- Units required to implement Type 3 Change Requests
- Remaining units available for the prioritization and implementation of Type 4 and Type 5 Change Requests.

Appendix I-A will be used to present this information.

(BST)

Part 5: Release Capacity Forecasting, Allocation, and Reporting

Forecast and Planning Information: In order to facilitate joint planning for long term development between BellSouth and CLECs, the following information will be provided:

- Two release plan views: One with an industry release and one without,
- The estimated capacity in units for the production releases (CLEC and BST) and industry release,
- Number of releases, type of releases and dates targeted. Appendix I-B will be used for presenting this information.
- After a release plan is selected and prioritization has occurred, an annual view of the Change Requests will be provided for planning purposes. This view will be updated after each prioritization.
- On an ongoing basis, Legacy System Releases will be posted to the website. See Appendix J.

Monitoring and Reporting Post-Release Capacity Utilization

BellSouth will track the capacity per the above categories and provide a Year-To-Date (YTD) percent capacity used. This report will be provided at CCP on a quarterly basis, beginning with calendar year 2002. Appendix I provides the report format.

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

Definition

BellSouth will introduce the development and implementation of business requirements and functionality for new interfaces to the CLEC community as part of the Change Control Process. BellSouth will conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 process for new CLEC interface functionality, BellSouth will notify all CLECs of the deviation promptly. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC community and proactively seek, consider and respond to CLEC comments and requests for enhancements to the specifications. As new interfaces, within the scope of CCP, are deployed, they will be added to the scope of this document and all subsequently requested changes will be managed by this process.

Retirement of Interfaces

Definition

As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

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

Retirement of Versions

Definition

When software release versions of a specific interface (e.g., TAG Application Program Interface Version n.n.n) are retired/expired, BellSouth will give CLECs a 180 day advance notification. The Carrier Notification that announces the retirement/expiration of specific interface release versions will also identify when BST will cease CLEC testing of those expiring release versions. For example, BellSouth's TAG, an application interface, has the ability of supporting multiple software release versions per industry map. Therefore, the retirement/expiration of a software release version does not necessarily expire an industry map, but instead only those specific interface release versions. Example of a retirement of a software versions of an interface: On March 8, 2001, BellSouth provided a Carrier Notification Letter that stated effective August 10, 2001, BellSouth would no longer support TAG API versions: 7.1.0.7, 7.5.0.10, and 2.0.0.11.

A CLEC may respond to Change Control with its desire to extend a retirement date. The CLEC must explain why the scheduled retirement date is not acceptable by providing the impact to its business.

BST will maintain an ongoing matrix of current and retired software versions in the monthly change control meeting materials.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (i.e., communication timelines) have occurred per the Change Control agreement.
- Three (3) levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround for each cycle of escalation
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five (5) day turnaround for each cycle of escalation (excludes expedites)
- For Type 6 High Impact Issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a 2-5 day turnaround to provide a status for each cycle of escalation.
- For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control email unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation: ECS Group – Type 1 Changes

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

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1 st Level	Byron Franklin Manager – EC Support Group Interconnection Operations	205-733-5400	1-800-862-0399 PIN 17264913	Byron.Franklin@bridge.bellsouth.com
2 nd Level	Bruce Smith Operations Director EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3 rd Level	Lynn Smith Operations Assistant Vice President Interconnection Operations	205-714-0010	N/A	Lsmith12@imcingular.com Lynn.A.Smith@bridge.bellsouth.com

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

Escalation Cycle for Types 2-6 Change Requests

Guidelines

- Item must be formally escalated as an email sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control email.
- Subject of email must be CLEC (CLEC Name) ESCALATION –CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of email must include:
 - Definition and escalation of item
 - History of item
 - Reason for escalation
 - Desired outcome of CLEC

- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and Email ID.
- For escalation Level 2, forward original email and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original email and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgment of receipt within four (4) hours and begin the escalation process through Level of escalation.
- BellSouth will provide updates to the CLEC when the status changes.
- The escalating CLEC should respond to BellSouth within five (5) days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggest a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within one (1) business day of the BellSouth decision in order to provide industry notification with the appropriate executives.
- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with outcome, either party can seek appropriate relief.

Contact List for Escalation: Types 2 – 6 Changes

NOTE: Escalations should be made according to the following list:

Escalation Level	Name and Title	Office Number	Email Address
1 st Level	Valerie Cottingham Director Change Control Process	205-321-2168	Valerie.Cottingham@bridge.bellsouth.com
2 nd Level	Dennis Davis OAVP (Encore Solution Delivery, Test Bed, User Requirements, CCP)	205-977-1103	Dennis.L.Davis@bridge.bellsouth.com
	Allan Tarr OAVP (Business Rules/Operations Issues)	404-927-7372	Allan.F.Tarr@bridge.bellsouth.com
	Suzie Lavett OAVP (TAG/LENS)	205-977-2876	Suzie.H.Lavett@bridge.bellsouth.com
	Audrey Thomas OAVP (EDI)	404-927-7886	Audrey.Thomas@bridge.bellsouth.com
	Al Bolden OAVP (LNP)	404-927-7011	Al.Bolden2@bridge.bellsouth.com
3 rd Level	Martha-Sue Blythe Senior Director (for Systems Issues)	404-927-7505	Marthasue.Blythe@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

Guidelines

In the event that an issue arises from Section 9, Changes to this Process, or arises from some other Section and is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs, resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the appropriate state regulatory agency, if available. If mediation is requested, parties shall participate in good faith.
- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.
- The impacted CLEC has the option to provide notice of any mediations or formal complaints to CCP participants.

9.0 CHANGES TO THIS PROCESS

Definition

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

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes (format, typographical errors, clarifications of meaning, etc.) may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. The CCP participants present at the meeting (in person or by teleconference) will reach an initial determination regarding the requested change(s) by “consensus”. For this purpose consensus will mean that no participant has serious objection to the determination of the group. The following initial determination may be applied:

- **Meeting Consensus** (BellSouth and the other meeting participants have no serious objection to the change. The change will be balloted for Industry Consensus with the indication that a meeting consensus was reached).
- **Contested Issue** (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are firm. The proposals will be balloted for Industry Consensus and the structure of the ballot will indicate that a choice between alternatives must be made).
- **Not Ready for Balloting** (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are not firm. The request will not be balloted and will remain open for review during subsequent monthly meetings. The CCP participants will continue to use the associated current change control process. Working documentation reflecting both the current and proposed language may be created to facilitate further discussion).
- **Implement as Cosmetic** (BellSouth and the other meeting participants determine that the requested change is a clarification of meaning with no potential negative impact. The change will be implemented and the Change Request will be updated to implemented status and update distributed as per the normal process).

Subsequent to this initial review, the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official Email ballot for distribution to determine the Industry Consensus. The official Industry Consensus ballot will detail the change(s) being requested, and the significant arguments presented for and against the change during the review. As noted above, the ballot will indicate whether issues are

being voted upon as the result of a Meeting Consensus or as a Contested Issue. Each issue presented on the ballot will contain a statement of the change to be approved and in the case of a Contested Issue, a summary of arguments for and arguments against the alternatives. The ballot will be distributed one (1) week following the Status Meeting. CLECs will have one (1) week in which to cast their vote. Only ballots transmitted before midnight of the due date will be counted. The CCCM, or other designated individual will cast each CLEC's vote. Each CLEC is allowed one vote on each issue presented on the ballot. The CCCM, or other designated individual will cast each CLEC's vote.

The ballot (a sample ballot may be found in the Appendix) will allow CLECs to indicate their agreement or disagreement with the proposed change across a three (3) step continuum as shown here:

A	B	C
Agree	Neutral	Disagree

When a Contested Issue is presented on the ballot, there will be a continuum for each of the alternatives and the voter must disagree with one (and only one) of the two.

Industry Consensus will exist and the change will be implemented whenever two-thirds of votes cast by the due date are cast in categories A and B. BellSouth may not be able to support all requested changes to the process as proposed. BellSouth will provide a supporting reason(s) to substantiate its position. A CLEC may seek relief through the escalation process if dissatisfied with BellSouth's response. No consensus will exist if over 1/3 of votes for a change are cast in category C – "Disagree".

10.0 TESTING ENVIRONMENT

Definition

BellSouth offers Interface and Functional testing to CLECs for the Local Exchange Navigation System (LENS), the Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are as follows:

- **CLEC Interface Testing** – Testing for CLECs implementing a new interface, product or release.
- **Functional Testing** – Testing conducted in the CLEC Application Verification Environment (CAVE), where CLECs can opt to do further functional testing, or testing to implement a new release.

Test Phases

The following defines the different phases of testing supported by BellSouth:

- **Physical Connectivity Testing** – This required phase of testing verifies communication is properly established and that both parties can send and receive electronic messages. Applicable to LAN users only.
- **Application Connectivity Testing** – This required phase of testing verifies communication is properly established between BellSouth platforms and CLEC specified connectivity methods such as:
 - EDI – VAN or CONNECT:Direct®
 - TAG
- **API Testing** – This optional phase of testing allows the CLEC to verify their software before Application Testing. No test cases are provided and testing is done against the simulator. This phase of testing applies only to CLECs using TAG.
- **Application Testing** – This conditional phase of testing uses a simulator and verifies that the mapping of data is correct and the CLEC software can communicate with BellSouth. This phase is required for TAG users when implementing a new interface, new TCIF issue or new product. This phase of testing verifies Pre-ordering and Ordering data mapping.
- **Syntax Testing** – This phase of testing verifies compliance to pre-determined structures such as ANSI ASC X12 EDI standards and TCIF industry standards. This phase of testing is required when implementing a new EDI interface or moving to a new EDI map.

- Validity Testing – This phase of testing verifies that the CLEC software can execute firm order test cases in compliance with the BellSouth Business Rules. This phase of testing is required when implementing a new interface, new product, or new TCIF issue.
- Production Verification Testing – This required phase of testing allows BellSouth and CLECs to confirm that transactions flow to the production environment. CLECs are required to submit a production transaction with live data. BellSouth will monitor to ensure that back-end applications can be accessed.
- Service Readiness Testing – This phase of testing only applies if it is included in the CLEC's Interconnection Agreement. This optional phase of testing allows a CLEC to test firm orders end-to-end. This is in BellSouth production environment.
- Functional Testing – This optional phase of testing, conducted in CAVE, allows a CLEC to perform functional testing for ordering on pre-production and post-production releases during the specified period. CLECs may choose to do additional functional testing in CAVE after other phases of testing are complete, or they may use CAVE for new release Functional testing in preparation for migrating to a new release.

All arrangements for testing should be coordinated with the BellSouth CLEC Care EC/OSS Support Team.

Change Control will communicate the CAVE testing window for each release.

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

www.interconnection.bellsouth.com/carriertypes/lec/html/oss_info.html

Testing in CAVE

1. BST will identify the process for testing the new release in CAVE.
2. BST will provide a New Release Testing Schedule.

(Updated CLEC Proposal for Section 10.0)
10.0 TESTING ENVIRONMENT

Definition

BellSouth offers Interface and Functional testing to CLECs for the Local Exchange Negotiation System (LENS), the Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces.

- **Testing Environments** – BellSouth maintains two testing environments, a “traditional” environment and the CLEC Application Verification Environment (CAVE).

The testing opportunities offered are as follows:

- **CLEC Interface Testing** – Testing for CLECs implementing a new interface, product or release. The capabilities of the two testing environments to support CLEC Interface Testing vary. BellSouth’s stated objective is to provide capability for all phases of testing, other than Functional Testing, in both environments.
- **Functional Testing** – Testing conducted in the CLEC Application Verification Environment (CAVE), where CLECs can opt to do further functional testing, or testing to implement a new release.

BellSouth currently documents the capabilities of the test environments and procedures for conducting testing in a number of various documents and is in the process of producing a single consolidated “CLEC Interface Testing Practices and Procedures” document.

Test Phases

The following defines the different phases of testing supported by BellSouth:

- **Physical Connectivity Testing** – This required phase of testing verifies communication is properly established and that both parties can send and receive electronic messages. Applicable to LAN users only.
- **Application Connectivity Testing** – This required phase of testing verifies communication is properly established between BellSouth platforms and CLEC specified connectivity methods such as:
 - EDI - VAN or CONNEXDirect®
 - TAG – LAN and Internet
 - LENS - LAN and Internet

- API Testing – This optional phase of testing allows the CLEC to verify their software before Application Testing. No test cases are provided and testing is done against the simulator. This phase of testing applies only to CLECs using TAG.
- Application Testing - This conditional phase of testing uses a simulator and verifies that the mapping of data is correct and the CLEC software can communicate with BellSouth. This phase is required for TAG users when implementing a new interface, new TCIF issue or new product. This phase of testing verifies Pre-ordering and Ordering data mapping.
- Syntax Testing - This phase of testing verifies compliance to pre-determined structures such as ANSI ASC X12 EDI standards and TCIF industry standards. This phase of testing is required when implementing a new EDI interface or moving to a new EDI map.
- Validity Testing - This phase of testing verifies that the CLEC software can execute firm order test cases in compliance with the BellSouth Business Rules. This phase of testing is required when implementing a new interface, new product, or new TCIF issue.
- Production Verification Testing - This required phase of testing allows BellSouth and CLECs to confirm that transactions flow to the production environment. CLECs are required to submit a production transaction with live data. BellSouth will monitor to ensure that back-end applications can be accessed.
- Service Readiness Testing - This phase of testing only applies if it is included in the CLEC's Interconnection Agreement. This optional phase of testing allows a CLEC to test firm orders end-to-end. This is in BellSouth production environment.
- Functional Testing - This optional phase of testing, conducted in CAVE, allows a CLEC to perform functional testing for ordering on pre-production and post-production releases during the specified period. CLECs may choose to do additional functional testing in CAVE after other phases of testing are complete, or they may use CAVE for new release functional testing in preparation for migrating to a new release.

All arrangements for testing should be coordinated with either the CLEC Care E-Commerce Team, the SVP Team, or the Test Management Team (*please provide the correct names for these teams*) as described in the current process document for the phase of testing being conducted.

For additional details on the testing environment, procedures and guidelines, please refer to the following BellSouth public Internet site:

www.interconnection.bellsouth.com/xxxxxxxxx

Testing In CAVE

BellSouth offers a separate systems environment that contains the application-to-application interface and gateway applications for both ordering and pre-ordering. Pre-ordering capabilities are available in LENS and TAG. Ordering capabilities are available via LENS, TAG and EDI.

BellSouth offers CLEC testing for new entrant testing, new release testing as well as regression testing. CLECs are responsible for establishing and maintaining connectivity to the BellSouth CLEC testing environment. Testing response time should generally be similar to those received in production provided the CLEC uses the same connectivity option that is also used in production.

The BellSouth CLEC test environment offers pre-ordering capability as well as ordering capabilities using the Local Service Request (LSR) process up to and including the service order processor. This process provides the opportunity for a CLEC to conduct comprehensive testing of both pre-ordering and ordering functionality. All BellSouth pre-ordering and ordering capabilities will be made available to CLECs in the CLEC test environment. In the event of known exceptions to this practice, CLECs will be notified.

Pre-ordering functionality is tested by the submission of a specific request type using either LENS or TAG and will be considered successful by the return of the expected and correct response data. Ordering functionality will be tested by the submission of an LSR via LENS, TAG or PDI. This type of testing will be deemed successful through the creation of a service order along with the return of the appropriate confirmation and completion notices associated with that particular order type.

Orders processed in the CLEC test environment will have no impact on the end state of the accounts tested in the simulated environment. Therefore, pre-ordering and ordering functions performed while in the test environment should not appear on Customer Service Records (CSR) for the live accounts. In addition, LSRs cannot be issued to migrate a retail account with the expectation that a subsequent LSR could then be processed against that same account in order to do post migration changes. Post migration changes can be tested only on accounts that have been previously established for that CLEC.

BellSouth will provide a test environment that contains a wide range of data associated with various account types. A BellSouth Test Manager will be assigned to work with a CLEC who wishes to enter into either new entrant or new release testing. The Test Manager will assist the CLEC in the selection of an appropriate set of test scenarios using the current set of test scenarios available on the BellSouth testing website fit their to best fit individual testing needs. A group of accounts will be available for use by all CLECs. Additionally, BellSouth will work with each individual CLEC to establish additional test accounts that will fulfill their individual testing needs.

The test environment will be available for testing of eligible pre-release code no later than 30 days prior to the projected production implementation date. During all other times the environment will be available to support testing against a copy of the present production release.

The test environment is not intended for CLEC volume testing. The BellSouth CLEC test environment makes available to the CLEC community three types of testing: New Entrant, New Release and Regression testing. Below is a further description of the three types of available testing.

New Entrant testing:

- Performed prior to the initial production submission of LSRs and/or pre-ordering transactions to BellSouth. This process is intended for those CLECs who are not currently in production

OR

- Allows CLECs to test new functionality/transactions for which they have not previously tested with BellSouth.

New Release Testing:

- Allows CLECs to test an impending BellSouth release that affects the interface and/or business rules. This is intended for CLECs who are currently in production with BellSouth using EDI, TAG or LENS.

Regression Testing:

- Allows CLECs to test existing functionality when that CLEC has made software and/or hardware changes.
- This type of testing is typically performed in conjunction with testing of new release functionality.
- Regression testing is supported for all releases that are currently available in the test environment.

RELEASE IMPLEMENTATION DECISION

The implementation of each release shall be mutually agreed between BellSouth and the CCP participating CLEC's two weeks prior to the scheduled implementation. BellSouth's participants shall include subject matter experts familiar with and responsible for the implementation of change requests to the interfaces, linkages and legacy systems impacted by proposed changes. A "go/no go vote" shall be held and decided upon the basis of consensus of BellSouth and the participating CLECs who have conducted pre-production testing.

Where the CAVE environment has been made available and operated satisfactorily the results of that testing shall be considered in addition to CLEC reviews of BellSouth's specifications and internal testing results.

Where CAVE testing is either not available or has not functioned properly CLEC reviews of BellSouth's specifications and internal testing results will be considered and may be sufficient to reach a consensus.

(Updated BellSouth Proposal for Section 10.0)
10.0 TESTING ENVIRONMENT

Definition

BellSouth provides support for interface and functionality based testing with CLECs via the following electronic interfaces:

- Electronic Data Interchange (EDI)
- Local Exchange Navigation System (LENS)
- Telecommunication Access Gateway (TAG)

BellSouth presently offers two (2) test environments, between which the testing categories mentioned below supported:

- “Traditional” Testing Environment
- CLEC Application Verification Environment (CAVE)

These test environments offer pre-order capability, in addition to ordering capability using the Local Service Request (LSR) process up to and including the service order processor. These test environments do not presently support volume testing.

The testing opportunities offered by BellSouth are divided into three (3) categories, and are as follows:

- The “New Entrant/New Product” Category supports testing for:
 - First Time CLEC EDI Implementations
 - First Time CLEC TAG Implementations
 - Existing EDI CLEC Ordering a new BellSouth Product (REQTYP) for the first time
 - Existing TAG CLEC Ordering a new BellSouth Product (REQTYP) for the first time
- The “New Release” Testing Category supports testing for:
 - Existing TAG, EDI, and LENS CLECs wanting to test an upcoming BellSouth release in CAVE prior to its production implementation
 - Existing TAG CLEC upgrading to a new API version
 - Existing EDI CLEC upgrading to a new MAP
- The “Regression” Testing Category supports testing in CAVE for:
 - Existing EDI CLECs who have made software and/or hardware changes
 - Existing EDI and TAG CLECs utilizing new fields for the first time
 - Existing TAG CLECs using a CAVE supported API version who have made software and/or hardware changes.

The above is intended to provide a high-level overview of the BellSouth CLEC testing offering. Comprehensive and detailed methods and procedures for the various aspects relating to the BellSouth CLEC testing process and environments can be found in the BellSouth Testing Practices and Procedures (TPP) document. This, as well as all other CLEC testing related documentation, can be found on the BellSouth testing website at (URL to be provided upon implementation of website).

Production Release Implementation Recommendation:

One week prior to the production implementation of a release that is being tested in the CAVE pre-release cycle, BellSouth will host a conference call with the CLEC community to discuss the status of testing and to address any questions and/or concerns that the CLEC community may have in regards to the release. During this conference call, BellSouth will take a CLEC production implementation recommendation vote for the release.

During the conference call, CLECs eligible to vote will be allowed to:

- Vote to recommend implementation of the release as scheduled. (PROCEED)
- Vote to recommend deferral of the release implementation to a later date. (DEFER)

Only CLECs who participated in pre-release testing in the CAVE environment will be called upon to vote. If a CLEC cannot attend the conference call to cast their vote, they may e-mail their vote to the designated BellSouth representative prior to the conference call. BellSouth will confirm receipt of their vote, and count that vote in the final tally. If a CLEC opts to not participate in the voting process, that decision will be recorded but will not affect the final tally of votes that are actually cast (the majority decision will only be determined by counting votes that are submitted).

In order for a CLEC to cast a “defer” vote, they must be affected by one of the following two (2) conditions:

- An un-resolved validated Severity 1 defect
- An un-resolved validated Severity 2 defect (with no work-around)

BellSouth will solicit the votes verbally from the eligible CLECs during the conference call, and compile a list of the individual responses. BellSouth will tally the votes for “Proceed” vs. “Defer”. The response that received the most votes will represent the collective CLEC recommendation for the release. In the event that both options receive an equal number of votes, BellSouth will treat this as a “deadlock” vote.

Once the CLEC recommendation has been determined, BellSouth will publish the recommendation in the daily testing status report that is published on the day that the vote took place. The report will include the collective decision (Proceed, Defer or Deadlock), as well as a list of those CLECs who participated in the voting process and the vote that they submitted. BellSouth will then use this recommendation, combined with the recommendations of its quality assurance testing teams and the information collected during the pre-release testing cycle to make a final decision as to whether or not the release is implemented on the targeted date.

11.0 TERMS AND DEFINITIONS

A

ACCOUNTABILITY

Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

ACKNOWLEDGMENT NOTIFICATION

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

APPROVED RELEASE PACKAGE

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

B

BELLSOUTH CHANGE CONTROL MANAGER (BCCM)

BellSouth Point of Contact for processing all Change Requests.

BFR (Bonafide Request)

Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the BellSouth CLEC Care Organization.

BUSINESS DAY

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

BUSINESS RULES

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

- The five (5) primary transactions sets: 850, 855, 860, 865 and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
 - Dependencies relative to other data elements
 - Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

CANCELLATION NOTIFICATION

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

CANDIDATE REQUEST LIST

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

CANDIDATE CHANGE REQUEST

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

CHANGE REQUEST

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

- Type 1 – BellSouth System Outage Notification. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.
- Type 2-5 – Expedited Feature Change. The inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact.
- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- Type 6 – CLEC Impacting Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is

unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

CHANGE REQUEST STATUS

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

- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - **CT = Training.** Requested change already exists, additional training may be required.
- **D = Request Purge.** Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled.** Indicates a Change Request has been scheduled for a release (Step 8).

NOTE: BellSouth will respond within seven (7) business days to a CLEC's request for clarification of a specific BellSouth response to a change request.

CHANGE REVIEW MEETING

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

CHANGE REVIEW PACKAGE

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

CLARIFICATION NOTIFICATION

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

CLEC AFFECTING CHANGE

Any change that potentially may cause a CLEC to modify the way it operates in conducting wholesale business transactions with BellSouth. Modifications to the way CLECs operate in conducting wholesale business transactions with BellSouth include, but are not limited to: (1) changes to CLEC system code; (2) changes in CLECs employee training; (3) changes to CLEC business methods and procedures at the transaction, clarification, or escalation levels (4) changes to the work assignments of CLEC personnel. Internal BellSouth process changes (either software or procedural) unique to the CLEC wholesale environment are CLEC affecting.¹⁸

CLEC CARE ORGANIZATION

The CLEC Care Organization represents the CLECs and all CLEC interests within BellSouth, that is, it is the CLEC's advocate within BellSouth. Some of the CLEC Care functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

CLEC CHANGE CONTROL MANAGER (CCCM)

Individual CLEC Point of Contact for processing Change Requests.

CSM

Customer Support Manager which supports resale and facility based CLECs.

CYCLE TIME

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

D

DEFECT

Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will

¹⁸ The procedures described in this document apply to all three groupings of the components of "interfaces" as described by the FCC. These include (1) a point of interface (or gateway); (2) any electronic or manual processing links (transmission links) between the interface and BellSouth's internal operations systems (including all necessary back office systems and personnel); and (3) all of the internal operations support systems (or "legacy systems") that BellSouth uses in providing network elements and resale services to competing carriers.

be addressed as a defect. **BST New Proposal for this paragraph:** If functional requirements agreed upon by BellSouth and the CLECs, do not result in the expected outcome and new user requirements and/or business rules are required, then this change request is not classified as a defect (i.e., Type 6) but rather a Type 4 (BST initiated) or Type 5 (CLEC initiated). It will follow normal process for implementing as a Type 4 or 5:

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

DEFECT STATUS

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

- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - **CT = Training.** Requested change already exists, or CLEC training issue.
- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

ELECTRONIC COMMUNICATIONS SYSTEMS (ECS)

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

ENHANCEMENT

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

EXPEDITED FEATURE

An expedited feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact. For both re-classified defects and enhancements to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing interface
- Will follow the Expedited Feature process flow which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 that are eliminated.

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

H

HIGH IMPACT

The failure causes impairment of critical system functions and no electronic workaround solution exists. Correction of high impact defects will occur within 10 business days following the date upon which BellSouth's defect validation process is scheduled to complete.

I

INTERNAL CHANGE MANAGEMENT PROCESS

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

L

LOW IMPACT

The failure causes inconvenience or annoyance.

M

MEDIUM IMPACT

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

N

NEED-BY-DATE

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

P

POINTS OF CONTACT (POC)

An individual that functions as the unique entry point for change requests on this process.

PRIORITY

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

One of four priorities may be assigned:

- 1-Urgent.** Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.
- 2-High.** Implement in the next possible scheduled major release, as determined during the Release Package Meeting.
- 3-Medium.** Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.
- 4-Low.** Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

PROJECT PLAN

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

PROPOSED RELEASE PACKAGE

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

R

RELEASE – INDUSTRY

The implementation of new industry standard(s) which may impact and require CLECs to make changes to their interface. An industry release may prohibit the use of an interface upon implementation of the Change(s).

RELEASE – MAINTENANCE

The implementation of scheduled maintenance of a BellSouth system that does not require CLECs to make changes to their interface or prohibit the use of an interface upon implementation. System downtime may be required.

RELEASE - PRODUCTION

The implementation of scheduled Change(s) which may impact and require the entire CLEC community to make changes to their interface. A production release may or may not prohibit the use of an interface upon implementation of the Change(s).

RELEASE PACKAGE

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

RELEASE CAPACITY MEASUREMENT - PRE-RELEASE CAPACITY

BellSouth will provide preliminary unit measurement estimates accompanying each change request that can be used by the CLECs during prioritization. BellSouth will provide the total number of units available for a specific release to be utilized as a tool for prioritization. Total number of units will be provided as follows:

Total Release Units

- Units required to perform network maintenance
- Units required to implement public switched network mandates such as NPA overlays and Number Pooling
- Units required to implement Type 6 Change Requests
- Units required to implement Type 2 Change Requests
- Units required to implement Type 3 Change Requests
- Remaining units available for the prioritization and implementation of Type 4 and Type 5 Change Requests.

Appendix I-A will be used to present this information.

NOTE: BellSouth recommends as an alternative: BellSouth will provide the estimated units of capacity per release by type (e.g., industry, production, maintenance, etc.) of release.

Appendix I-B will be used to present this information.

RELEASE CAPACITY MEASUREMENT REPORT – POST RELEASE

At the end of each quarter BellSouth will provide a report listing the percent YTD capacity used during the quarter. Quarterly report is APPENDIX I. The process is effective January 2002 with Release 10.3.1. Attached to this report will be a list of all Type 2, 3, 4, 5, 6 change requests that were implemented.

RELEASE PACKAGE NOTIFICATION

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

RELEASE SCHEDULE

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

S

SPECIFICATIONS

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

SYSTEM OUTAGE

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

V

VERSION (DOCUMENT)

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

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 = A4A contains sample Change Control forms and line by line Checklist.

Change Request Form.

Used when submitting a request for a change (Attachment A-1)

Change Request Form Checklist.

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

Change Request Clarification Response.

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

Change Request Clarification Checklist.

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

Acknowledgment Notification.

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

Acknowledgment Notification Checklist.

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

Cancellation Notification.

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

Cancellation Notification Checklist.

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

Clarification Notification.

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

Clarification Notification Checklist.

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

Letter of Intent.

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

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

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

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

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

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

APPENDIX C – ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D – BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

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

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen – (CLECs) updates will be implemented to correct defects (Type 6 changes) and to comply with Regulatory Mandates within the capabilities of the frozen industry standard no other than BellSouth recommends as an alternative one of the following two (2) actions based on the CLEC's choice: **OPTION 1:** Updates will be implemented to correct High Impact defects and to comply with Regulatory Mandates within the capabilities of the frozen industry standard. Medium Impact defects may be considered for correction based on user impact and collaborative discussions between BellSouth and the affected CLEC. Notwithstanding the foregoing, the CCP members and BellSouth may agree on a case-by-case basis that due to other priorities for the use of the capacity or that due to the limited number of users of the frozen industry standard group, the High Impact defects and Regulatory mandates will not be implemented in the frozen industry standard version of the interface. **OPTION 2:** When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen. Except where 10 percent or less of the users of the interface are utilizing the frozen industry standard or where BellSouth and the CCP members agree that capacity should be utilized for other purposes, updates will be implemented to correct High Impact defects and to comply with Regulatory Mandates within the capability of the frozen industry standard. Medium Impact defects may be considered for correction based on user impact and collaborative discussions between BellSouth and the affected CLEC. changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard

versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

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

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

APPENDIX E – SUB-TEAM DEFINITION AND ROLES/RESPONSIBILITIES

A Sub-Team will be formed for issues that are more effectively addressed in a small group setting.

The Sub-Team will consist of CLECs and BellSouth who volunteer to participate in meeting(s) to address a specific issue. This team will be responsible for presenting information and making recommendations to the CLEC participants of Change Control.

The Change Control Management Team will be responsible for coordinating meetings and the flow of communication.

The Sub-Team leader or representative will participate in each Monthly CCP Status Meeting occurring during the life of the Sub-Team.

APPENDIX F – “SAMPLE” VOTING BALLOT

<p>ITEM NO. XX - Meeting Consensus Description of Section</p>	<p><input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p>
<p>ITEM NO. XX – Contested Consensus (Voters must disagree with one (1) of the following recommendations and indicate ranking of the other) Description of Section CLEC Recommendation</p> <hr/> <p>BellSouth Recommendation</p>	<p><input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <hr/> <p><input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p>

APPENDIX G – CARRIER NOTIFICATIONS

Carrier Notifications for updates to the Local Exchange Ordering Guide – Volume 1 and the BellSouth Business Rules for Local Ordering (BBR-LO) indicate if the change impacts documentation only or the electronic and/or manual ordering processes, if known. Details of the change are contained in the Summary of Changes that is distributed to the CLECs via email.

Change Request number(s) will be listed in the associated Carrier Notifications for software releases, if applicable. Associated documentation changes for software releases are also reflected in the Carrier Notification Letter.

A table consisting of the scheduled release dates and an itemization of release features is attached to each revised Carrier Notification letter. Each revised letter provides direct access to the original letter.

NOTE: BellSouth Carrier Notifications are located on the BellSouth Interconnection Website at: www.interconnection.bellsouth.com/main/clec.html

**APPENDIX H – Preliminary Feature Sizing Model for CCP
Prioritization Planning**

CR Number :	DESCRIPTION:		Draft User Requirement: (Y/N)	Synergies with Other Related CRs
Type CR:				
Systems	System impacted Y/N	Level of Work Effort: List Number of Units. (incremental units in quarters is permissible) 1 Unit=100 Release Cycle Hours	Constraints/ Comments	Integrated Testing Required (Y/N)
LENS				
TAG				
EDI				
LESOG				
LEO				
LNP				
SGG				
DOM				
Other (List each)				
Total Units				

Field Description:

CR Number: The Change Control Process Change Request Number (CR) assigned to feature.

Type CR: Type 4 (BST Initiated) or Type 5 (CLEC Initiated)

Description: The Change Control Process Change Request description that coincides with the CR Number.

Draft User Requirement: (Y/N): Yes indicates a Draft User Requirement was available when sizing was performed. No indicates a Draft User Requirement was not available when sizing was performed.

Synergies with Other Related Change Requests: List of related change requests that may benefit from being implemented at the same time as this feature.

Systems: A list of CLEC interface systems and key operation support systems that will require a work effort to implement this feature.

- LENS – Local Exchange Navigation System
- TAG – Telecommunications Access Gateway
- EDI – Electronic Data Interchange
- LESOG – Local Exchange Service Order Generator
- LEO – Local Exchange Ordering
- LNP – Local Number Portability
- SGG – Service Gate Gateway
- DOM – Delivery Order Manager

System impacted: Yes indicates this system will require a level of work effort to implement this feature. No indicates this system will not require a level of work effort.

Level of Work Effort: List Number of Units. (incremental units in quarters is permissible.): The total number of planning, analysis, design, code development, testing and implementation units required for the implementation of this change request. One Unit=100 Release Cycle Hours.

Release Cycle Hours (RCH): RCH = the total number of hours estimated for planning, analysis, design, code development, testing and implementation for a single change request.

Constraints/Comments: If a constraint in implementing this feature is critical to implementation it will be listed. For example, if a system affected has an annual release schedule, this will be listed as a constraint.

Integrated Testing Required (Y/N): Yes indicates that integration testing is required. No indicates there is no integration testing required.

Total Units: Equals the total units of systems impacted.

APPENDIX I: Monitoring and Reporting Post-Release Capacity Utilization

Annual Release Capacity Utilization – YTD Quarterly Report										
Categories	1Q		2Q		3Q		4Q		YTD / EOY	
	Units	%	Units	%	Units	%	Units	%	Units	%
Maintenance										
PSN Mandate										
Regulatory (Type 2)										
Defects (Type 6)										
Industry (Type 3)										
BellSouth (Type 4)										
CLEC (Type 5)										
Total										

(CLECs)

Appendix I-A: Reporting Pre-Release Capacity Forecasting

Annual Release Capacity Forecast										
	Release	Release	Release	Release	Release	Release	Release	Release	Release	Rel
Release Purpose										
Planned Date										
Categories	Units	Units	Units	Units	Units	Units	Units	Units	Units	U
Maintenance										
PSN Mandate										
Regulatory (Type 2)										
Defects (Type 6)										
Industry (Type 3)										
BellSouth (Type 4)										
CLEC (Type 5)										
Total										

BellSouth alternative to CLECs recommended Appendix I-A.

Appendix I-B: Reporting Estimated Pre-Release Annual Capacity Forecasting

Activity	CLEC Production Release(s)	BST Production Release(s)	Industry Release, i.a. ¹⁹	Maintenance Releases
Scope ²⁰				
Tentative Implementation Data(s)				
Est. Capacity per release (units)				
# of Releases				
Total Capacity				

¹⁹ Industry Release is planned for Type 3 (i.e. FI MS).

²⁰ Defines the Feature Type and/or use of release. For example, a CLEC Production Release is planned for Type 2s, 6s, 5s, and (optional) are 4s; BST Production Release is planned for Type 2s, 6s, 5s, and (optional) are 5s; May also include Network Infrastructure elements.

APPENDIX J: Changes to Legacy/Backend Systems for Pre-Ordering, Ordering, Provisioning, Maintenance, Billing and Repair or wholesale work center operations

RSAG – Regional Street Address Guide:

Release Date	Possible CLEC Impact	Release Information

**CCP Document
Matrix of Disagreed Items**

(O = Open, still under discussion / D = Disagreed)

Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
1	2.0 – 4 th Para	D 21	<p>BellSouth's proposed language "for scheduling CLEC Production Releases" negates the CLECs overall efforts to prioritize change requests by eliminating any meaning for the prioritization of BellSouth initiated change requests by CLECs.</p> <p>As was discovered by KPMG and reported in Florida Third Party Test Exception 88, BellSouth is the only entity that has input to and considers changes at Step 7 of the process that have not been submitted to the CCP as change requests for prioritization.</p> <p>These BellSouth initiated changes, which no one else is aware of, are originated solely by BellSouth's internal organizations and compete directly with published change requests for release capacity.</p> <p>BellSouth's unannounced development and implementation of these "secret" changes has altered the prioritization assigned to published CRs and delayed their implementation.</p> <p>The CLECs know neither of their existence nor the impact they will have upon meeting the needs of the CLECs when prioritization of the published change requests occurs.</p> <p>BellSouth has confirmed that all of these changes are exclusive to the wholesale processes that support only the CLECs and do not address BellSouth retail processes.</p> <p>The existence of these secret changes makes it impossible for the</p>	<p>The CLECs' proposed language is designed to ensure that BellSouth complies with the CCP, although only as it relates to Type 4 (BellSouth-initiated) Change Requests. BellSouth's proposed language would require adherence to the CCP for all Change Requests (not just Type 5s), but would clarify that BellSouth will implement CLEC requested features in CLEC Production Releases as guided by the CLECs' prioritization. All Type 2, 4, 5 and 6 Change Requests, regardless of whether implemented in a CLEC or BellSouth Production Releases will be communicated to the CCP membership, although BellSouth's Production Releases would not be subject to CLEC approval, as the CLECs' proposed language seeks to do.</p>

ATTACHMENT 2

**CCP Document
Matrix of Disagreed Items**

(O = Open, still under discussion / D = Disagreed)

Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
			CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	
2	2.0 - DCCoM	D 22	<p>As BellSouth has confirmed, the processes being considered for change within BellSouth's internal process exist only to support BellSouth's operations that serve the CLECs. There is no impact to any other part of BellSouth's business. Despite this the CLECs have no visibility into the process or objective representation within it.</p> <p>The CLECs are proposing to identify the inclusion of the Designated CLEC Co-Moderator (DCCoM) function (discussed below in Item 23) in this step of the process. Under BellSouth's current policies and under its proposed new language the CLECs are specifically excluded from participation in Step 7 of the process and have no objective representation.</p> <p>The establishment of the DCCoM function will enhance BellSouth's process and the coordination with the CLEC's parallel internal processes essential to the timely and effective implementation of prioritized changes.</p> <p>BellSouth has argued that it must have privacy to conduct its business affairs and that it should not be subject to having the CLECs directing its business. The DCCoM would have no voice or vote in BellSouth's decision making. This proposal does not deny BellSouth the right to conduct its business as it sees fit. It simply provides BellSouth with the opportunity to obtain real-time input from its customers and for its customers to have first hand knowledge in a timely manner of changes which of impact their business.</p>	<p>BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively. The definition of a "CLEC affecting" change has been expanded so as to increase the scope of the CCP, and BellSouth will use the CCP membership Forum for discussing, prioritizing and obtaining final approval for the CLEC Production Releases, as well as for providing the changes in BellSouth Production Releases. CLECs can participate fully in the Change Control Process without participating in internal BellSouth meetings, which would hamper BellSouth's ability to run its business.</p>

**CCP Document
Matrix of Disagreed Items**

(O = Open, still under discussion / D = Disagreed)

Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
			<p>This is a method to allow BellSouth to meet the expectations of the FCC as set forth in the GA/LA Order - "We encourage BellSouth to continue to accommodate competitive LEC requests to improve the transparency and effectiveness of its Change Control Process." FN 697.</p> <p>As noted above and in Item 1, CLECs are the only customers and users of the systems and processes being discussed by BellSouth in these meetings.</p>	
3	3.0 - Type 2	D 23	<p>There are two distinct issues for this CCP Section reference. <u>The first one</u> is an issue with the implementation of regulatory mandates that do not have ordered implementation dates. The <u>second</u> is an issue with the need for "mutual consent" to initiate the Expedited Feature Process.</p> <p style="text-align: center;">Undated Regulatory Mandates</p> <p>Most regulatory mandates include a specific implementation date in the regulatory body's order. If the regulatory order does not provide a specific date the CLECs propose that the 60 week interval associated with the implementation of Type 4 and Type 5 changes in their proposal be applied as an outside limit to the mandated change.</p> <p>This would not prevent or restrict implementation of the mandate before the expiration of 60 weeks. Furthermore, the CLECs support the expeditious implementation of such non-time specific mandates. (See Item 6)</p>	<p>The issue in dispute concerns whether regulatory mandates (Type 2 Change Requests) that do not include a specific implementation date must be implemented within 60 weeks of prioritization, as the CLECs have requested, or whether BellSouth should have greater flexibility in implementing such Change Requests, as BellSouth's language would allow. There is limited amount of release capacity available for a given year, and Type 2s of this nature should be implemented in accordance with the expectation of the regulatory body that ordered the change. BellSouth should be able to implement a regulatory mandate without subjecting such mandate to CLEC approval or prioritization. Such implementation may result in BellSouth having to expedite the mandate or having more than 60 weeks to implement it, which the CLEC proposed language would not allow.</p>

**CCP Document
Matrix of Disagreed Items**

(O = Open, still under discussion / D = Disagreed)

Item	CCP Section	Status/ Page	CLEC Position	BellSouth Position
			<p>Nor does, the CLEC's proposal restrict BellSouth's ability to seek an interval longer than 60 weeks for such changes through appeal to a regulatory body or through agreement for a "Negotiated Extended Implementation" which is described below in Item 30.</p> <p>The establishment and operation of the Flow Through Task Force ("FTTF") as provided for in the January 2001 order in this docket is an example of an order without an implementation time period. The ordered purpose was "to eliminate the high BellSouth Caused Failures and the designed manual fallout for electronically submitted LSR's." The order for the FTTF however did not provide a specific date for the implementation of task force recommendations or its dissolution.</p> <p>Today, 17 months (68 weeks) after the Order, 1 of every 5 electronically submitted CLEC LSRs still encounters either designed manual fallout or BellSouth caused failure. Further, there are at least 15 FTTF change requests that will not be implemented before May of 2003, which is 29 months (120 weeks) after the Commission's order.</p> <p align="center">Mutual Consent to Expedite</p> <p>BellSouth had previously agreed to language which states: "With mutual consent by the participants, Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3." The agreement was reached at the April 11, 2002 meeting, balloted and approved in Ballot 10, and published in Version 3.0 of the CCP Document on May 1, 2002. Yet, BellSouth now simply states that it "cannot support" the language it previously agreed to.</p>	

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			<p>The CLECs proposal allows BellSouth to implement mandated requests in advance of ordered implementation dates with the mutual consent of the CLECs. Should the CLECs not agree to the expedited implementation, BellSouth would not suffer any harm because it could implement the change on the date ordered and, meet its ordered obligation.</p>	
4	3.0 – Type 4 1 st Paragraph	D 24	<p>A major stated and published objective of the CCP is “Timely and effective implementation of feature and defect change requests.” However, the existing CCP contains no intervals or guidelines for the actual implementation of feature change requests (Type-4 and Type-5 Change Requests, and undated Type-2s).</p> <p>[See also the CLEC Coalition Comments being separately submitted for a description of an associated new metric for the timely implementation of feature requests.]</p> <p>Operating in this environment has resulted in the creation of an on-going backlog of feature change requests and excessively long implementation intervals for the majority of requests implemented.</p> <p>The current backlog is 65 items. 36 are Type-5 (CLEC-initiated), 10 are Type-4 (BellSouth-initiated), and 19 are Type-2 (Regulatory, mostly Flow Through Task Force initiated):</p> <ul style="list-style-type: none"> • 5 of the requests are “New.” Under the CCP, a “new” request is a change request that has been received by the BellSouth Change Control Manager, but has not yet been validated. 	<p>The CLECs’ proposed language would require that BellSouth commit unlimited resource capacity to meet an infinite (yet undetermined) amount of demand (i.e., number of CLEC-initiated change requests) merely upon the request of CLECs to implement these features. There are hundreds of CLECs that potentially could make requests for new features. The defined process does not limit the number of CLECs who participate in CCP nor does it limit the number of change request any CLEC may request of BellSouth. No company has unlimited resources, and no ILEC, to BellSouth’s knowledge, is subject to a Change Control Process by which CLECs determine the level of OSS investment that the incumbent must make. BellSouth’s proposed language is part of a comprehensive prioritization proposal by which: (i) BellSouth provides the estimated sizes for all features requested for prioritization along with the estimated amount of capacity available for the releases; and (ii) CLECs and BellSouth share equally available release capacity (after all scheduled defects are corrected, all regulatory mandates are implemented, and all needed updated industry standards are built). Under BellSouth’s proposal, CLECs have the necessary tools to make an informed decision to prioritize features and determine which should be deployed first, second, etc., and can be assured that Change Requests</p>

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			<p>Although the interval for validation under the CCP is 10 business days, BellSouth did not meet that timetable for any of these. One of the requests was filed as long ago as December 2000.</p> <ul style="list-style-type: none"> • 5 of the requests are "Pending." A "pending" request is a change request that has been accepted by the BellSouth Change Control Manager and scheduled for change review and prioritization. One of these requests was submitted in April 2000, and two others were submitted more than nine months ago. • 42 of the requests are "Candidate Requests." A "Candidate Request" is a change request that has completed the change review and prioritization process and is ready to be scheduled for implementation in a release. Of these requests 16, or nearly 40 percent of the total, were originally submitted in 1999 or 2000. An additional 7 requests were submitted between January and June 2001. 16 of the "Candidate Requests" were prioritized in April 2001, but have still not been scheduled by BellSouth for implementation. None of these "Candidate Requests" can be scheduled for implementation before May 2003. • 13 of the requests are "Scheduled." A "scheduled" request is a change request that has actually been scheduled for implementation through a BellSouth release. In the case of these 13 requests, implementation has been scheduled for August or December 2002. For 8 of these requests, the 	<p>will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs, and subject to available capacity. BellSouth's comprehensive prioritization proposal is reasonable and has been endorsed by both KPMG and the Staff of the Florida Public Service Commission.</p>

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			<p>scheduled implementation date is at least 19 months (and as long as 34 months) from the date on which the request was originally filed. The implementation dates scheduled for three additional requests are between 11 and 14 months from the original submission date. One of the scheduled requests was originally submitted in August 1999; the majority of the remaining requests were submitted before December 2000.</p> <p>BellSouth's caveat on page 24 of "subject to available capacity" effectively eliminates commitment. BellSouth has argued that it fears the CLECs will overload the process with change requests making it impossible to meet the 60-week guideline. BellSouth offers no evidence that this has ever happened or any rational reason why CLECs would have any incentive to do so.</p> <p>BellSouth's fear ignores at least three factors.</p> <p>First, when a change request is submitted BellSouth has the right to reject it for (1) cost, (2) technical feasibility, or (3) industry direction. Thus, BellSouth has the ability to guard the process because it has seen and validated all requests. Should BellSouth reject a given change request, the originating CLEC(s) must use the escalation and dispute resolution process to obtain relief.</p> <p>Second, the 60 week interval begins following the prioritization step that will always be 30 to 90 days after submission of the change requests being prioritized. This provides BellSouth with the opportunity to discuss any impending overload it perceives with the CLECs prior to prioritization. Further, BellSouth has the right, following prioritization, to utilize the dispute resolution process to</p>	

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			<p>obtain relief in a manner analogous to the CLECs use of the process to obtain relief when change requests are rejected.</p> <p>Third, under the CLEC's proposal, BellSouth also has the opportunity to obtain a Negotiated Extended Implementation for any given change request. (See Item 30 below.)</p> <p>Additionally, BellSouth's caveat of "subject to available capacity" indicates that BellSouth intends to continue to provide resources to meet the needs of CLECs in the same arbitrary, exclusionary, and reactive manner that has resulted in the backlog described above.</p>	
5	3.0 – Type 4 2 nd Paragraph	D 24	<p>The BellSouth caveats included in its proposed language, which are: "in the CLEC Production Releases that will occur" and "subject to available capacity", are prime examples of the key differences between the CLEC's and BellSouth's overall positions on the nature of the CCP.</p> <p>The CLECs are proposing an open, single, unified process for the timely implementation of all change requests regardless of their origin based upon a jointly established prioritization. BellSouth's proposal, in contrast, establishes separate tracks for CLEC initiated changes and BellSouth initiated changes, excludes the CLECs from any participation in the BellSouth track, excludes the CLECs from participation in vital portions of the process in the CLEC track, and reserves to BellSouth the right to implement changes that have not been subjected to the process.</p> <p>The CLECs propose an open single, unified process to implement</p>	<p>There are only two aspects of this language that are in dispute. The first relates to the CLECs' desire that BellSouth commit unlimited resources to implementing an unlimited number of change requests, which BellSouth is unwilling to do for the reasons explained in Item No. 4 above. The second issue relates to BellSouth's proposal for sharing equally available release capacity by having separate CLEC Production Releases and BellSouth Production Releases. The CLEC Production Release would be used to implement those change requests that the CLECs have prioritized, and the BellSouth Production Release would be used to implement those change requests that are a priority to BellSouth (including CLEC-initiated change requests). The determination of which features to implement in the BellSouth Production Release should be left to BellSouth, not the CLECs. Accordingly, BellSouth can agree with the CLEC language for application to <u>CLEC Production Releases</u> and with the acknowledgement that implementation is <u>subject to available capacity</u>. BellSouth's proposed language includes these two phrases.</p>

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			<p>feature changes according to their priority, in a timely manner, and with a minimum of defects, regardless of who initiated the request. The key aspects of the CLEC proposal are.</p> <ul style="list-style-type: none"> • Feature changes should be implemented within 60 weeks of their prioritization. • No BellSouth or CLEC initiated changes should be allowed to enter BellSouth's internal development (Steps 7-10) without first being subject to the previous steps of the CCP. • BellSouth should provide the CLECs with visibility into its internal development process. • Prioritization ranking, BellSouth preliminary feature sizing model information, and BellSouth release capacity information will be used to sequence the implementation of changes in the various software releases that will occur during the 60-week interval. • BellSouth may alter this sequence only with CLEC concurrence • All prioritized change requests will be assigned to as many future releases as necessary to complete the sequencing process. <p>BellSouth's caveat that "in the CLEC Production Releases that will occur" means that BellSouth is (1) establishing a separate path for its own change requests, (2) will not consider the CLECs prioritization binding upon the sequence of implementation within that separate path, and (3) is excluding CLECs from the process associated with that separate path.</p> <p>The CLECs do not agree with the concept of separate CLEC and</p>	

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			<p>BellSouth production releases. As is discussed below in Item 17, the establishment of a separate path for BellSouth's self-initiated change requests with a guaranteed 50% of the forecast capacity is unwarranted, wasteful of scarce programming resources, and counterproductive.</p>	
6	3.0 – Type 4 3 rd Paragraph	D 24	<p>As noted above in Item 3, the CLECs support the expeditious implementation of non-time specific mandates. In fact the CLEC's proposal provides for the possible use of an Expedited Feature Process for all four types of feature related change requests (2,3,4 and 5) by mutual consent.</p> <p>BellSouth agrees that mutual consent should be obtained for the use of the Expedited Feature Process for Type 3 and Type 5 changes, but reserves to itself the right to unilaterally expedite Type 2 and Type 4 changes.</p> <p>BellSouth's use of the caveat "within the CLEC Production Releases" forces CLECs to accept a needlessly inefficient use of programming resources to obtain an expedite, if a CLEC Production Release is next in the schedule, or be denied the capability to obtain an expedite if it is a BellSouth Production Release that is next in the schedule.</p> <p>BellSouth's position is inconsistent with the posed collaborative nature of the CCP and with at least two of its principle objectives:</p> <ul style="list-style-type: none"> • "Timely and effective implementation of feature and defect change requests." • "Allow for mutual impact assessment and resource planning to 	<p>The only issue in dispute with respect to this section concerns the CLECs' proposed language that would render BellSouth Production Releases subject to CLEC consent and approval. BellSouth's comprehensive prioritization proposal, which has been endorsed by KPMG and the Florida Public Service Commission Staff, would create CLEC Production Releases and BellSouth Production Releases. For Type 4 changes, BellSouth agrees with the CLECs that mutual consent should be required to expedite any feature in a <u>CLEC Production Release</u>. However, BellSouth should be able to expedite any feature in a <u>BellSouth Production Release</u>, without obtaining the consent of the CLECs, as long as BellSouth provides the requisite notice to the CCP membership about any such expedited features.</p>

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			<p align="center">manage and schedule changes.”</p> <p>BellSouth has used unilateral expedited treatment of feature change requests it initiates to support its own regulatory agenda at both the state and federal level to bolster its 271 case and to respond to negative findings from third party OSS testing. These efforts have negatively impacted and delayed other pending change requests.</p>	
7	3.0 -- Type 5 1 st Paragraph	D 25	<p>The existing CCP contains no intervals or guidelines for the actual implementation of feature change requests (Type-4 and Type-5 Change Requests, and undated Type-2s). This is in violation of the purpose of the CCP: ‘Timely and effective implementation of feature change request.</p> <p>Operating in this environment has resulted in the creation of an on-going backlog of feature change requests and excessively long implementation intervals for the majority of requests implemented.</p> <p>See Item 4 above for the full details of the CLECs’ support for their proposed language.</p>	<p>This is the same issue in dispute for Item No. 4, except that this issue relates to BellSouth-initiated Change Requests (Type 4s) rather than CLEC-initiated Change Requests (Type 5s). However, BellSouth’s position is the same, namely that BellSouth should not be required to commit unlimited resource capacity to implement every BellSouth-initiated Change Request within 60 weeks simply because the CLECs have prioritized such requests. No company has unlimited resources, and no ILEC, to BellSouth’s knowledge, is subject to a Change Control Process by which CLECs determine the level of OSS investment that the incumbent must make. BellSouth’s proposed language is part of a comprehensive prioritization proposal by which: (i) BellSouth provides the estimated sizes for all features requested for prioritization along with the estimated amount of capacity available for the releases; and (ii) CLECs and BellSouth share equally available release capacity (after all scheduled defects are corrected, all regulatory mandates are implemented, and all needed updated industry standards are built). Under BellSouth’s proposal, CLECs have the necessary tools to make an informed decision to prioritize features (including BellSouth-initiated Change Requests) and determine which should be deployed first, second, etc. CLECs also can be assured under BellSouth’s proposal that Change Requests will</p>

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				<p>be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs, subject to available capacity. BellSouth's comprehensive prioritization proposal is reasonable and has been endorsed by both KPMG and the Staff of the Florida Public Service Commission.</p>
8	3.0 – Type 5 2 nd Paragraph	D 25	<p>The BellSouth caveats included in their proposed language “in the CLEC Production Releases that will occur” and “subject to available capacity” are prime examples of the key differences between the CLEC’s and BellSouth’s overall positions on the nature of the CCP.</p> <p>See Item 4 above for the full details of the CLECs’ support for their proposed language.</p>	<p>This is the same issue in dispute for Item No. 5, which involves two areas of disagreement. The first relates to the CLECs’ desire that BellSouth commit unlimited resources to implementing an unlimited number of change requests, which BellSouth is unwilling to do for the reasons explained in Item No. 4 above. The second issue relates to BellSouth’s proposal for sharing equally available release capacity by having separate CLEC Production Releases and BellSouth Production Releases. The CLEC Production Release would be used to implement those change requests that the CLECs have prioritized, and the BellSouth Production Release would be used to implement those change requests that are a priority to BellSouth (including CLEC-initiated change requests). The determination of which features to implement in the BellSouth Production Release should be left to BellSouth, not the CLECs. Accordingly, BellSouth can agree with the CLEC language for application to <u>CLEC Production Releases</u> and with the acknowledgement that implementation is <u>subject to available capacity</u>. BellSouth’s proposed language includes these two phrases.</p>
8a	3.0 – Type 6 2 nd paragraph	D 25	<p>BellSouth has elected to address Section 3.0 – Type 6 in two separate line entries, Item 8a, and Item 9. The CLECs’ comments are all included in Item 9.</p>	<p>BellSouth has proposed language to clarify the definition of a CLEC impacting defect (Type 6 Change Request). Such clarification is necessary to recognize the two different ways in which software errors can arise and would allow BellSouth to shorten the intervals applicable to correcting true software defects. There are two ways that defects can be introduced in software: errors that are made when</p>

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				<p>designing and subsequently coding the software and errors made because of an oversight in documenting the functionality that should be created. The current definition for a Type 6 – CLEC Impacting Defect does not distinguish between a coding error versus an oversight in documenting the functionality to be designed. Based on the current CCP defect definitions, a defect is created when the system does not perform as expected regardless of whether the behavior was introduced because of a coding error or because of incomplete requirements. When changes are introduced to the system, the change is documented in business rules that are developed to describe the change, user requirements that reflect how the systems should be changed to implement the revised business rules, and systems requirements that reflect the actual software changes that will be made to satisfy the request. This series of documentation is used to test and validate software changes. If the system is determined to not be working as these requirements were written, it is considered a defect. In this case, the developer has a “road map” (i.e., these documented requirements) that explains how the software is supposed to behave and what should be done to correct the defect. The defect is then assigned a severity level that reflects the impact to the functionality and that determines how soon the defect should be corrected.</p> <p>When the system is not working because of an oversight in developing requirements or business rules, the developers do not have a ‘road map’ that indicates how the software should behave or what changes should be made to correct the problem. In this case, the functionality was developed, tested and implemented as intended by all the documentation (i.e., business rules, user/system requirements)</p>

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				<p>but the functionality (change request) does not work as intended or may not work as well as it should. To correct this type of defect involves adding new functionality, which requires developing new business rules, user requirements, and system requirements, all of which must be defined and validated before software changes can be made. Developing this additional functionality is a new feature (or change request) and should be handled accordingly.</p> <p>The current definition of a Type 6 Change Request erroneously includes an oversight in documenting functionality. BellSouth's proposed language clarifies this definition to include only true software defects.</p>
9	3.0 – Type 6	D 25-26	<p>BellSouth has elected to address Section 3.0 – Type 6 in two separate line entries, Item 8a, and Item 9. The CLECs' comments are all included in Item 9.</p> <p>There are two distinct issues at this CCP Section reference. <u>First</u>, BellSouth has an issue with the definition of a defect that did not previously exist. <u>Second</u> is the issue of the implementation interval for medium and low impact defects that BellSouth now ties to the first issue.</p> <p align="center">Defect Definition (page 25)</p> <p>In its second update of its "green-line" language submitted to the CLECs on 6/28/02, BellSouth has separated out the last sentence of the opening paragraph, which was not previously in dispute between</p>	<p>BellSouth and the CLECs have agreed that "high impact" software defects (i.e., those that impair critical system functions and no electronic workaround solution exists) should be corrected within ten (10) business days. The disagreement on this issue concerns the timeframe for correcting "medium impact" and "low impact" software defects. "Medium impact" software defects are defined as an impairment of a critical system function, although a workaround solution does exist. The current timeframe for correcting "medium impact" software defects is ninety (90) business days, which was established to comply with an order entered by the Florida Public Service Commission last year in an arbitration initiated by AT&T. Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP. Even though the current timeframe for correcting "medium impact" software defects is the direct result of a state commission order, BellSouth is willing to reduce this interval to forty-five (45) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Forty-five (45)</p>

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			<p>the CLECs and BellSouth, and provides a “BST New Proposal for this paragraph.”</p> <p>It is not the purpose of this filing to create new issues. The language BellSouth now seeks to replace was not addressed by BellSouth in its February 15th filing, or any of the workshops held during March, April or May, or even included in BellSouth’s first specific update to this filing delivered to the CLECs on 6/24/02. As a matter of procedure The Commission should refuse to consider this particular language.</p> <p>To the extent the Commission does consider this proposal, the CLECs offer the following comments. First, the language BellSouth is seeking to change has been the CCP definition for defects since inception of the process. Second, the entire purpose of the existing language is specifically to include the conditions BellSouth cites in its “new proposal” within the scope of defects. BellSouth “new proposal” has no merit and is clearly an attempt by BellSouth to take advantage of the Commission’s participation in resolving these changes to the CCP.</p> <p align="center">Defect Correction Intervals (page 26)</p> <p>BellSouth’s recommended alternative language here calls for the correction of medium impact defects in 45 business days (or next available maintenance release) and low impact defects in 60 business days. Further, in a <u>third</u> update to its green-line language delivered to the CLECs on July 1, 2002, BellSouth stated that its 45 and 60 day</p>	<p>days is a reasonable amount of time to correct a defect that has an acceptable workaround. This interval allows consideration of the defect priority to other features that may be in development and vying for resources and enables the defect to be implemented within the release schedule presented to the CCP members. It also would allow BellSouth to meet the CLECs’ request that Type 6 defects be corrected in maintenance releases whenever possible thereby not affecting the production releases and their corresponding capacity. Maintenance Releases are normally scheduled any month that a production or industry release is not scheduled, and establishing a forty-five (45) business day interval should allow BellSouth to accommodate the CLECs’ request.</p> <p>With respect to “low impact” software defects, which are defined as failures causing inconvenience or annoyance, the current timeframe for correcting is “best effort.” Because “low impact” software defects have no immediate adverse impact to the users, correcting such defects does not and should not take a high priority in implementation, particularly when compared to other Change Requests. Nevertheless, BellSouth is willing to commit to correcting “low impact” software defects within sixty (60) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Sixty (60) business days is a reasonable amount of time to correct a defect that does not detrimentally affect performance or stability or otherwise adversely impact a CLEC.</p> <p>BellSouth has proposed these reduced intervals in order to address the CLECs’ request that software defects be corrected in a shorter period</p>

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			<p>offers were contingent upon acceptance of its new proposed definition discussed immediately above. The CLEC's propose 20 business days and 30 business days respectively for these same intervals.</p> <p>BellSouth's selection of 45 days and 60 days is totally arbitrary and unacceptable. Until it forwarded its second update to its green-line language to the CLECs on 6/28/02 BellSouth's position was that the appropriate intervals were 90 and 120 days. While the reduction in intervals appears significant it is inadequate based upon the facts of BellSouth's capabilities and the needs of the CLECs.</p> <p>It is not necessary (or desirable) to wait for a release in order to implement a defect correction. BellSouth has repeatedly implemented defect corrections outside any formal release. For example, most recently, BellSouth corrected 12 of 17 software defects arising from the implementation of Release 10.5 on various dates between 6/3/02 and 6/16/02. At least five of these were classified as medium impact. Thus the CLEC's 20 business day interval for medium impact defects is obtainable and reasonable and any requirement to wait for a release unnecessary.</p> <p>BellSouth's performance in its voluntary correction of the majority of the "low impact" defects associated with the implementation of Parsed Customer Service Records within 24 <u>calendar</u> days demonstrates that the CLECs' proposed 30 <u>business</u> day interval is also obtainable and reasonable.</p> <p>[See also the CLEC Coalition Comments being separately submitted for a description of recommended changes to the metrics associated</p>	<p>of time. BellSouth can only accommodate this request if the definition of a Type 6 Change Request is clarified to include only true software defects, as BellSouth has proposed in Item No. 8a. Absent this clarification, errors in documenting functionality are considered a Type 6 Change Request, which requires work analogous to adding a new feature to fix and which cannot be accomplished in a shorter amount of time.</p>

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			with the timely implementation of defect corrections.]	
10	4.0 – Part 1 – Step 2 Outputs	O 32	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision. The trial process is working well. It is anticipated that a workshop to resolve this and other issues will be held in the near future.	This issue is still under discussion by BellSouth and the CLECs.
11	4.0 – Part 2 – Step 4, Act #5 (BCCM)	D 39	<p>For the CCP to be a joint forward looking proactive process, all parties to the process must have the same detailed information available to them about the elements of the process to be managed and coordinated. In the case of the CCP the principle elements being managed and coordinated are (1) the change requests and (2) the programming resources available, assigned and expended.</p> <p>The contrasts between the CLEC and BellSouth’s proposed language here and in several of the associated items discussed below are prime examples of the key differences between the CLEC’s and BellSouth’s overall positions on the sharing of this vital information. This includes information related to the individual change request sizing as they progress through the process, and information about the programming resources required, forecast, available, assigned and expended as the process operates to implement the requests in current and future releases.</p> <p>The CLECs propose the on-going sharing of information at each step in the process where the information is likely to change such as prioritization, release package development, release management and implementation, and post implementation. The CLEC’s proposal requests that at these points data be provided in the same groupings of</p>	BellSouth is committed to providing complete and timely information to assist the CLECs in their prioritization efforts and agrees with much of the CLECs’ proposed language. The CLECs earlier this year agreed to a process (contained in Appendix H) by which BellSouth provides the feature sizing for the Type 4 and Type 5 Change Requests that are candidates for prioritization. Once the CLECs have prioritized the features, BellSouth provides a 12-month view of features scheduled, implemented or planned. This is commonly called the Flagship Feature Release Schedule and is discussed in each CCP Monthly Status Meeting. Although BellSouth is agreeable to most of the CLECs’ proposed language, BellSouth cannot agree to the language that purports to require BellSouth to provide feature sizing for “all future releases.” Such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Since the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a yearly view of features, as proposed by BellSouth, which includes “known” future releases, is a reasonable alternative. The parties also disagree about the specific feature sizing information that should be provided. The CLECs appendix I-A suggests that there is a set amount of capacity for each category they list by release. This is not the case. Production

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			<p>categories to allow for tracking and the early detection of potential problems. Appendix I (to which the parties have agreed) provides post implementation data in distinct categories. The CLECs propose Appendix 1-A (See Item 48 below and page 117 of the Updated CCP Document) for the reporting of Pre-Release Capacity Forecast information and changes during the process steps using the same categories as in Appendix I. With this constancy in the reporting of the basic process data the effectiveness of the process can be analyzed and improvement plans developed.</p> <p>In contrast, BellSouth's proposed language limits providing sizing information to only certain types of change requests, and only at a single point in the process (prioritization). Further it limits the sharing of information on releases to an annual snapshot in a format and grouping inconsistent with Appendix I making both in progress evaluation of the process and post implementation evaluations impossible (See Item 48 below and page 118 of the Updated CCP Document). BellSouth's proposal excludes the CLECs from access to information about the process as changes occur which is vital to the CLECs internal resource planning.</p> <p>The CLECs are requesting "information on each pending change request" and "all future releases" and that Appendix I-A, which is consistent with Appendix I, be used as the basic structure for release capacity forecast information.</p> <p>BellSouth is willing to provide information only on "Type 4 and Type 5 change requests", and estimated release capacity information only "annually" and only for releases planned for "the following year"</p>	<p>Releases, whether a CLEC or BellSouth Production Release, can have Types 2, 4, 5, or 6 Change Requests. In the case of the Type 4s and 5s, they are optional and entirely dependent upon whether it is a CLEC or BellSouth Production Release. In either case, during a "Pre-Release" point in time, these releases are open to any and all types as mentioned. Listing Units by category, as the CLECs' proposed Appendix I-A would require BellSouth do so, erroneously presumes that BellSouth knows how much capacity each release, by category of Type Change Request, would have before prioritization and release planning by the CLECs. Although BellSouth could arbitrarily designate release capacity by category, there is no logical basis for doing so. As an alternative, BellSouth offers Appendix I-B, which provides pre-release capacity information, expressed in units, and provides the intelligence for the CLECs to determine the pre-release capacity available. It also allows the flexibility and reality of how the Change Request types correspond to release types. For example, Type 6s and PSN mandates are predominantly targeted for maintenance releases, while Types 2s, 4s, and 5s are targeted for production releases in accordance with the BellSouth and CLEC Production Release guidelines. Lastly, Type 3s are targeted for the Industry Release. The information that BellSouth proposes to provide to the CLECs to assist in the prioritization effort, as outlined in Appendix I-B, is reasonable and should be adopted.</p>

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			<p>using Appendix I-B, which is inconsistent with Appendix I.</p> <p>Limiting the information being provided makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.</p>	
12	4.0 – Part 2 – Step 4 – Note after Act #3 (CCCM)	D 39	<p>In the agreed upon portion of this note BellSouth confirms that the information associated with each change request may change after prioritization.</p> <p>The CLECs request is for the changes to be communicated to them.</p> <p>BellSouth's response is that the limited information it proposes to provide (as discussed in Item 11 above) will not be updated when changes occur.</p>	<p>BellSouth has proposed language to make clear that the release information BellSouth will provide to assist the CLECs in their prioritization efforts relate to Type 4 and Type 5 Change Requests, which are the only Change Requests that CLECs prioritize.</p>
13	4.0 – Part 2 – Step 4 - Inputs	D 40	<p>The CLECs request that an input to this step should be the information discussed in detail above in Item 11.</p>	<p>This issue in dispute is related to Item No. 11 and concerns detailing the information that BellSouth provides to CLECs in connection with feature prioritization. BellSouth's proposed language is specific and detailed so there is no confusion about what information BellSouth will be providing. The same cannot be said about the CLECs' proposed language, which merely refers to providing "full release capacity."</p>
14	4.0 – Part 2 – Step 4 - Outputs	D 40	<p>The CLECs request that an output from this step should be any changes to the input information that occurs as a result of the process discussed above in Item 13.</p>	<p>This issue in dispute is related to Item No. 11 and concerns the information that BellSouth provides to CLECs in connection with feature prioritization. Consistent with the process to which the CLECs agreed earlier this year, once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, with a 12-month view of features scheduled, implemented or planned.</p>

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				<p>BellSouth cannot agree to the CLECs' proposed language that purports to require BellSouth to provide feature sizing for "all future releases." Such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Since the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a yearly view of features, as proposed by BellSouth, which includes "known" future releases, is a reasonable alternative.</p>
15	4.0 – Part 2 – Step 5 – Prioritization Meeting	D 40	<p>Once again BellSouth creates an issue that did not previously exist.</p> <p>In its first update of its "green-line" language submitted to the CLECs on 6/24/02, BellSouth added the restrictive language shown here. The timing of prioritization meetings was not previously in dispute between the CLECs and BellSouth.</p> <p>It is not the purpose of this filing to create new issues. The language BellSouth now seeks to amend was not addressed by BellSouth in its February 15th filing, or any of the workshops held during March, April or May. As a matter of procedure The Commission should refuse to consider this particular language.</p> <p>To the extent that the Commission does consider it, the CLECs offer the following comments regarding the proposed restrictions. First, the language BellSouth is seeking to change has been the official schedule for prioritization under the CCP since inception of the process. Second, prioritization is not limited to change requests associated with only CLEC Production Releases, BellSouth's language here would eliminate the prioritization of BellSouth initiated</p>	<p>BellSouth has proposed language to clarify that a prioritization meeting should only be held when applicable.</p>

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			change requests. Third, the regular prioritization of new change requests is essential to their timely implementation and should be the driver of the establishment of new releases rather than being "Dependent on whether a CLEC Production Release is available for prioritization." This is another example of BellSouth's exclusionary and reactive view of the CCP. BellSouth's restrictions have no merit and are clearly an attempt by BellSouth to take advantage of the Commission's participation in resolving these changes to the CCP	
16	4.0 – Part 2 – Step 5, Act #3	D 41	<p>The CLECs request at this step of the process is the same as discussed above in Item 11 for the exchange of forward looking information over a planning horizon of two years for all pending change requests and the releases necessary for their timely implementation.</p> <p>Once again BellSouth's response, limits the information it proposes to share to only Type-4 and Type-5 change requests and a 12 month period.</p> <p>Limiting the information being provided makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.</p>	BellSouth's proposed language concerning the information that will be provided in connection with the CLEC prioritization effort is consistent with the process to which the CLECs agreed earlier this year. BellSouth's proposed language also makes clear that the information BellSouth will provide to assist the CLECs in their prioritization efforts relate to Type 4 and Type 5 Change Requests, which are the only Change Requests that CLECs prioritize.
17	4.0 – Part 2 – Step 5, Act #6	D 41	In this portion of the process the CLEC's proposal results in the preparation of a jointly prioritized plan for the timely implementation of all pending change requests using the required number of unified production releases (releases containing all types of changes – regulatory, defect, BellSouth initiated and CLEC initiated). Unified releases maximize the efficient utilization of BellSouth's programming resources. Given that the prioritization and order of	BellSouth's proposed language details the approach that should be taken in scheduling the changes for the releases. The CLEC language does not take into account necessary maintenance that is required for efficiency and stabilization, acknowledgement of infrastructure upgrades, nor does it provide flexibility in utilizing the maintenance releases as the primary source for defect correction. Fundamentally, BellSouth's proposed language details how it can "dedicate capacity"

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			<p>implementation under the CLEC's proposal is jointly determined, it is logical that any changes thereafter should be jointly determined and, therefore require CLEC concurrence.</p> <p>In contrast, BellSouth proposes a concept it copied from the change control plan of another ILEC – separate BellSouth and CLEC Production Releases. BellSouth proposes this work effort would only apply to “the CLEC Production Release being scoped”. Further, even within the confines of a CLEC Production Release BellSouth refuses to seek CLEC concurrence to changes, committing only to “provide rationale” should it decide to restructure the implementation order.</p> <p>The CLECs are proposing an open, single, unified process for the timely implementation of all change requests regardless of their origin based upon a jointly established prioritization. BellSouth's proposal, in contrast, establishes separate tracks for CLEC initiated changes and BellSouth initiated changes, excludes the CLECs from any participation in the BellSouth track, excludes the CLECs from participation in vital portions of the process in the CLEC track, and reserves to BellSouth the right to implement changes that have not been subjected to the process.</p> <p>This separate track concept is wasteful of the BellSouth programming resources to the detriment of all. Throughout the updated BellSouth green-line language, there are references to how BellSouth will manage the CLEC production releases, but not one mention of how it will manage the so-called BellSouth production releases. BellSouth states that its concept provides “parity” - “Estimated capacity for production releases is equal.” However, there is no evidence to</p>	<p>to the CLECs in order to implement those changes important to them and enable BellSouth to continue with necessary changes to enable it to operate efficiently, which also benefits the CLECs.</p>

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			<p>suggest that a blind equal allocation of capacity has any validity. An analysis of the year 2003 capacity information that BellSouth made available beginning on May 10, 2002, reveals that it is not. In 2003, BellSouth's blind allocation has provided BellSouth with capacity beyond its needs.</p> <p>Regarding potential releases in 2003, BellSouth has provided the CLECs with information on two options. In Option A there would be 2 CLEC production releases, 3 BellSouth production releases and 5 maintenance releases using approximately 3,000 units. In Option B there would be 1 CLEC production release, 2 BellSouth production releases, 5 maintenance releases, and an industry standard release, again using approximately 3,000 units. In each option one of the BellSouth Production Releases was dedicated to an Infrastructure Upgrade, but the capacity required for that release in each option was different as was the capacity needed for maintenance releases.</p> <p>When questioned during the May 22, 2002 Change Control Status and Prioritization Meeting whether the units in Option B for the Infrastructure Release and Maintenance Releases were adequate BellSouth stated that the objectives of the releases could be met with only these units. Thus the information reveals that in Option A BellSouth reserved to itself more capacity than was necessary for the Infrastructure Production Release (105 units) and Maintenance Releases (158), a total of 263 units, about 15 man years work effort.</p> <p>It is clear under both Option A and Option B that BellSouth has manipulated the process to allocate 50% of the non-industry standard and non-maintenance capacity to itself and 50% to the CLEC</p>	

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			<p>production releases. This arbitrary allocation has no basis and will impede the timely implementation of all change requests.</p> <p>Individual sizing information for change requests to be prioritized during the May 22, 2002 meeting was provided to the CLECs on May 15. On May 23rd BellSouth provided the results of the prioritization and a total of units for 24 of the 26 changes prioritized. The total was 817 units. An additional 998 units of capacity have been estimated as necessary for the implementation of Type-2 requests from the Flow Through Task Force ("FTTF") in 2003.</p> <p>None of the change requests prioritized on May 22, 2003 can be implemented in 2002 according to BellSouth. Of the 26 requests prioritized, 8 were initiated by BellSouth and, there are currently no other pending BellSouth change requests, nor will there be any other unimplemented BellSouth change requests at year end 2002. The 8 BellSouth initiated change requests require only an estimated 156 capacity units. Despite this fact, under Option B BellSouth has reserved to itself 314 units over and above the Infrastructure Release requirements and in Option A it had reserved 837 units.</p> <p>The establishment of separate releases for 2003 is clearly wasteful of resources and has a negative impact on the timely implementation of the highest priority changes irregardless of their origin, including even the implementation of changes to the infrastructure designed to ensure and improve the stability and performance requirements.</p>	
18	4.0 – Part 2 – Step 5 - Inputs	D 42	The CLECs request that an input to this step should be any changes to the sizing and capacity information that occur as a result of the	This issue in dispute is related to Item No. 11 and concerns the information that BellSouth provides to CLECs in connection with

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			process discussed above in Item 14.	feature prioritization. Consistent with the process to which the CLECs agreed earlier this year, once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, with a 12-month view of features scheduled, implemented or planned. BellSouth cannot agree to the CLECs' proposed language that purports to require BellSouth to provide feature sizing for "all future releases," since such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Because the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a yearly view of features, as proposed by BellSouth, which includes "known" future releases, is a reasonable alternative.
19	4.0 – Part 2 – Step 5 - Outputs	D 42	The CLECs request that an output from this step should be publication and commitment to the results of the work discussed above in Item 17.	This issue in dispute is the same as Item Nos. 11, 14, and 18, which are addressed above
20	4.0 – Part 2 – Step 6 - Inputs	D 42	The CLECs request that an output from this step should be publication and commitment to the results of the work discussed above in Item 17.	This issue in dispute is the same as Item Nos 11, 14, and 18, which are addressed above.
21	4.0 – Part 2 – Step 7 - DCCoM	D 42	The CLECs are providing a header to identify the inclusion of the Designated CLEC Co-Moderator (DCCoM) function (discussed above in Item 2 and below in Item 23) in this step of the process. Under BellSouth's current policies and under its proposed new language the CLECs are specifically excluded from participation in this step and have no objective representation.	This issue in dispute is related to Item No. 2 and concerns the CLECs' request to participate in internal BellSouth meetings. BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively. The definition of a "CLEC affecting" change has been expanded so as to increase the scope of the CCP, and BellSouth will use the CCP membership Forum for discussing, prioritizing and

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				obtaining final approval for the CLEC Production Releases, as well as for providing the changes in BellSouth Production Releases. CLECs can participate fully in the Change Control Process without participating in internal BellSouth meetings, which would hamper BellSouth's ability to run its business.
22	4.0 – Part 2 – Step 7, Act #2	D 43	<p>BellSouth's statement is that "This step is not necessary since BellSouth will implement CLEC requested features in CLEC Production Releases as guided by the CLEC's prioritization." totally misses the point of the CLEC's proposal for unified releases. Furthermore, BellSouth's position reveals its determination to exclude CLECs from vital steps in the process and reserve to itself complete independence to implement or not implement any given change on a schedule of its own choosing.</p> <p>As was discovered by KPMG and reported in Florida Third Party Test Exception 88, BellSouth is the only entity that has input to and considers changes at Step 7 of the process <u>that have not been submitted to the CCP as change requests for prioritization.</u></p> <p>See Item 1 above for the full details of the CLECs' support for their proposed language.</p>	<p>The issue in dispute is related to Item No. 1, and concerns the CLECs' proposal that BellSouth comply with the CCP, although only as it relates to Type 5 (BellSouth-initiated) Change Requests. BellSouth's proposed language would require adherence to the CCP for all Change Requests (not just Type 5s), but would clarify that BellSouth will implement CLEC-requested features in CLEC Production Releases as guided by the CLECs' prioritization. If for any reason the order of implementation requested by the CLECs cannot be met (e.g., technical constraints), BellSouth will provide the rationale. All Type 2, 4, 5 and 6 Change Requests, regardless of whether implemented in a CLEC or BellSouth Production Release will be communicated to the CCP membership, although BellSouth's Production Releases would not be subject to CLEC approval, as the CLECs' proposed language seeks to do.</p>
23	4.0 – Part 2 – Step 7, Act #3	D 43	<p>The establishment of the DCCoM function will enhance BellSouth's process and the coordination with the CLEC's parallel internal processes essential to the timely and effective implementation of prioritized changes.</p> <p>See Item 2 above for the full details of the CLECs' support for their</p>	<p>This issue in dispute is related to Item Nos. 2 and 21 and concerns the CLECs' request to participate in internal BellSouth meetings. For the reasons previously explained, BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively.</p>

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			proposed language.	
24	4.0 – Part 2 – Step 7, Act #4 1 st Paragraph	D 43	<p>In this portion of the process, the CLEC’s proposal takes the results of the jointly prioritized plan for the timely implementation of all pending change requests developed per the discussion in Item 17 above to determine and schedule the required number of unified production releases (releases containing all types of changes – regulatory, defect, BellSouth initiated and CLEC initiated). Unified releases maximize the efficient utilization of BellSouth’s programming resources.</p> <p>BellSouth’s proposed modifications exclude CLECs from the process and restrict the scope of the planning process to be reactive rather than proactive. This makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.</p>	<p>This issue in dispute is related to Item No. 4 and concerns the CLECs’ proposed language which would require that BellSouth commit unlimited resource capacity to meet an infinite (yet undetermined) amount of demand (i.e., number of CLEC-initiated change requests) merely upon the request of CLECs to implement these features. There are hundreds of CLECs that potentially could make requests for new features. The defined process does not limit the number of CLECs who participate in CCP nor does it limit the number of change request any CLEC may request of BellSouth. No company has unlimited resources, and no ILEC, to BellSouth’s knowledge, is subject to a Change Control Process by which CLECs determine the level of OSS investment that the incumbent must make. BellSouth has developed a comprehensive prioritization proposal by which: (i) BellSouth provides the estimated sizes for all features requested for prioritization along with the estimated amount of capacity available for the releases; and (ii) CLECs and BellSouth share equally available release capacity (after all scheduled defects are corrected, all regulatory mandates are implemented, and all needed updated industry standards are built). Under BellSouth’s proposal, CLECs have the necessary tools to make an informed decision to prioritize features and determine which should be deployed first, second, etc., and can be assured that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs, and subject to available capacity. BellSouth’s comprehensive prioritization proposal is reasonable and has been endorsed by both KPMG and the Staff of the Florida Public Service</p>

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				Commission. Consistent with that proposal, BellSouth recommends keeping the current language in this paragraph and adding the phrase "CLEC Production Release" to clarify which release is involved.
25	4.0 - Part 2 - Step 7, Act #4 2 nd Paragraph	D 43	<p>As discussed in Item 17 above, given that the prioritization and order of implementation under the CLEC's proposal is jointly determined, it is logical that any changes thereafter should be jointly determined and therefore require CLEC concurrence.</p> <p>A detailed discussion contrasting the impacts of unified versus separate release tracks and, highlighting the negative impacts of BellSouth's separate track proposal can be found in Item 17 above.</p>	BellSouth's suggested language details the approach that should be taken in scheduling the changes for the releases. The CLEC language does not take into account necessary maintenance that is required for efficiency and stabilization, acknowledgement of infrastructure upgrades, nor does it enable flexibility in utilizing the maintenance releases as the primary source for defect correction. Fundamentally, BellSouth has detailed how it can "dedicate capacity" to the CLECs in order to implement those changes important to them and enable BellSouth to continue with the necessary changes to enable it to operate efficiently.
26	4.0 - Part 2 - Step 7, Act #5	D 43	<p>There are two related but separate issues at this CCP section reference. First, the establishment of a 60 week interval for the implementation of feature change requests. Second, the use of joint prioritization to establish unified releases.</p> <p align="center">60 Week Interval</p> <p>A major stated and published objective of the CCP is "Timely and effective implementation of feature and defect change requests." However, the existing CCP contains no intervals or guidelines for the actual implementation of feature change requests (Type-4 and Type-5 Change Requests, and undated Type-2s). See Item 4 above for the full details of the CLECs' support for their proposed language.</p> <p align="center">Joint Prioritization / Unified Releases</p>	The issue in dispute is related to Item Nos. 4, 7, and 24 and concerns the CLECs' request that BellSouth devote unlimited release capacity to implementing every Change Request within 60 weeks of prioritization, which, for the reasons previously explained, BellSouth is unable to do. BellSouth has developed a comprehensive prioritization process that gives the CLECs the necessary tools to make an informed decision to prioritize features, that equitably distributes available release capacity, and that provides assurances that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs, subject to available capacity. BellSouth's proposal, which has been endorsed by KPMG and the Florida Public Service Commission Staff, is reasonable and should be adopted.

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			<p>The BellSouth caveats included in their proposed language here “in the CLEC Production Releases that will occur” and “subject to available capacity” are prime examples of the key differences between the CLEC’s and BellSouth’s overall positions on the nature of the CCP.</p> <p>See Item 5 above for the full details of the CLECs’ support for their proposed language.</p>	
27	4.0 – Part 2 – Step 10, Act #4	D 46	<p>Active project management of the implementation of upcoming releases is underway in this part of the process. The CLEC’s request the sharing of updated and sizing information as development occurs. BellSouth’s response is that it will not provide updates. This makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.</p>	<p>BellSouth’s language clearly identifies the manner in which estimated units of effort will be provided consistent with the process to which the CLECs agreed earlier this year, which is outlined in Appendix H. The CLECs’ proposed language is too general and does not clearly set forth the information that BellSouth is to provide.</p>
28	4.0 - Part 3 - Header & 1 st Paragraph	D 48	<p>The CLEC’s propose a process (Exception Process) that with mutual consent will allow either the expedited implementation of a feature change request (Expedited Feature Process) or the implementation of a feature change request beyond the 60 week interval (Negotiated Extended Implementation Process) without prejudice.</p> <p>BellSouth rejects the Negotiated Extended Implementation Process (“BellSouth does not support.”), and modifies the Expedited Feature Process to exclude BellSouth initiated changes from the mutual consent requirement.</p>	<p>The CLECs have proposed this section in an attempt to address BellSouth’s concern about having to implement ALL features within 60 weeks as requested by the CLECs. Although the CLECs have proposed that BellSouth implement all features within 60 weeks of prioritization with NO constraints such as capacity, this section states that if BellSouth should not have enough capacity, it can present its case to the CCP membership and they will be the body to approve whether or not BellSouth is granted a stay of implementation of all features. This proposal is not practical or realistic. The CLECs have no incentive to grant BellSouth any relief, no matter how compelling the circumstances. As has been proven in past CCP meetings, the CLECs operate as a coalition against BellSouth, which has only one</p>

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				vote, in any matter when it comes to prioritization and scheduling. BellSouth cannot agree to such one-sided language, which places in the hands of CLECs the level of investment that BellSouth must make in its OSS. To BellSouth's knowledge, no other ILEC is subject to such a Change Control Process.
29	4.0 – Part 3 – Expedited Feature – 2 nd Bullet	D 48	<p>The CLECs propose a single process applicable to any feature change request regardless of its origin. See Item 31 below.</p> <p>BellSouth's modifications allow BellSouth the unilateral right to expedite its own changes without either consultation with or mutual consent of the CLECs. Historically, this is exactly how BellSouth has used this process.</p>	BellSouth's recommended language clarifies the agreement for expediting features consistent with CLEC Production Releases.
30	4.0 – Part 3 – Negotiated Extended Implementation	D 48	<p>Here and in the figure identified in Item 32, the CLECs propose a Negotiated Extended Implementation Interval Process.</p> <p>As discussed in Item 4 above, such a process directly addresses BellSouth's fear that CLECs would willfully over load the CCP with change requests in order to make it impossible for BellSouth to meet the 60 week implementation interval.</p> <p>BellSouth rejects the concept of a Negotiated Extended Implementation Interval without explanation.</p>	The issue in dispute is the same as Item No 28. The CLECs' proposed language is one-sided and would place in the hands of CLECs the level of BellSouth's OSS investment, to which BellSouth cannot agree for the reasons previously explained.
31	4.0 – Part 3 – Enhancement – 4 th Bullet	D 49	The CLEC's proposal provides for the possible use of an Expedited Feature Process for all types of feature related change requests (2,3,4 and 5) by mutual consent. (See also Item 33 for the associated detailed Step 3A activities.)	BellSouth agrees with CCP membership concurring to expedites within <u>CLEC Production Releases</u> since these releases are "earmarked" for CLEC requests. Because BellSouth Production Releases are intended for implementing BellSouth priorities (which can include CLEC-initiated Change Requests), BellSouth should not

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			<p>BellSouth agrees that mutual consent should be obtained for the use of the Expedited Feature Process for Type 3 and Type 5 changes, but reserves to itself the right to unilaterally expedite Type 2 and Type 4 changes.</p> <p>See Item 6 above for the full details of the CLECs' support for their proposed language.</p>	<p>be required to consult the CCP membership for consensus in expediting features into a BellSouth Production Release. BellSouth does agree that the CCP should be notified of these expedite requests in an expeditious manner.</p>
32	4.0 – Part 3 – Figure 4-X: Negotiated Extended Imp. Feature Process	D 40-50	<p>Here and in Item 30 above, the CLECs propose a Negotiated Extended Implementation Interval Process.</p> <p>As discussed in Item 4 above, such a process directly addresses BellSouth's fear that CLECs would willfully over load the CCP with change requests in order to make it impossible for BellSouth to meet the 60 week implementation interval.</p> <p>BellSouth rejects the concept of a Negotiated Extended Implementation Interval without explanation.</p>	<p>The issue in dispute is related to Item Nos. 28 and 30, which concerns the CLEC proposal that, if BellSouth does not have enough capacity to implement Change Requests within 60 weeks, it can present its case to the CCP membership and they will be the body to approve whether or not BellSouth is granted a stay of implementation of all features. As previously explained, this proposal is not practical or realistic and would place in the hands of CLECs the level of investment that BellSouth must make in its OSS. To BellSouth's knowledge, no other ILEC is subject to such a Change Control Process.</p>
33	4.0 – Part 3 – Step 3A	D 55	<p>The CLECs present the detailed Step 3A information necessary to make mutual consent for expedited implementation proposal discussed above in Items 29 and 31 operational.</p> <p>BellSouth's recommended alternative allows BellSouth the unilateral right to expedite its own changes without either consultation with or mutual consent of the CLECs.</p>	<p>The issue in dispute is the same as Item Nos. 28, 30, and 32, which concerns the CLECs' proposal that the level of BellSouth's OSS investment be placed in their hands. BellSouth cannot agree to this proposal for the reasons previously explained.</p>
34	4.0 – Part 3 – Step 4, Act #2	D 55	<p>As BellSouth has confirmed, the processes being considered for change within BellSouth's internal process exist only to support</p>	<p>This issue in dispute is related to Item Nos. 2, 21, and 23 and concerns the CLECs' request to participate in internal BellSouth</p>

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			<p>BellSouth's operations to serve the CLECs. There is no relationship to any other portion of BellSouth's business. Despite this the CLECs have no visibility into the process or objective representation within it.</p> <p>See Item 2 above for the full details of the CLECs' support for their proposed language.</p>	<p>meetings. For the reasons previously explained, BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively.</p>
35	5.0 – 3 rd Paragraph	D 57	<p>Once again, BellSouth creates an issue with the definition of a defect that did not previously exist and as it did above in Item 9 ties reduced implementation intervals discussed below in Item 36 and 37 to it.</p> <p>See Item 2 above for the full details of the CLECs' support for their proposed language.</p>	<p>This issue in dispute is related to Item No. 8a and concerns the need to clarify a Type 6 Change Request as a true software defect, which would allow BellSouth to shorten the intervals applicable to implementing such Change Requests. The current definition of a Type 6 Change Request includes an oversight in documenting functionality, which is not a true software defect.</p>
36	5.0 – Medium	D 57	<p>BellSouth's recommended alternative language calls for the correction of medium impact defects in 45 business days (or next available maintenance release). The CLECs propose 20 business days for this same interval.</p> <p>See Item 9 above for the full details of the CLECs' support for their proposed language.</p>	<p>This issue in dispute is related to Item No. 9 and concerns the timeframe for correcting "medium impact" software defects. "Medium impact" software defects are defined as an impairment of a critical system function, although a workaround solution does exist. The current timeframe for correcting "medium impact" software defects – ninety (90) business days – was established to comply with an order entered by the Florida Public Service Commission last year in an arbitration initiated by AT&T. Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP. Even though the current timeframe for correcting "medium impact" software defects is the direct result of a state commission order, BellSouth is willing to reduce this interval to forty-five (45) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Forty-five (45) days is a reasonable amount of time</p>

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				to correct a defect that has an acceptable workaround. This interval allows consideration of the defect priority to other features that may be in development and vying for resources and enables the defect to be implemented within the release schedule presented to the CCP members. It also would allow BellSouth to meet the CLECs's request that Type 6 defects be corrected in maintenance releases whenever possible thereby not affecting the production releases and their corresponding capacity. Maintenance Releases are normally scheduled any month that a production or industry release is not scheduled, and establishing a forty-five (45) business day interval should allow BellSouth to accommodate the CLECs' request.
37	5.0 – Low	D 58	BellSouth's recommended alternative language here calls for the correction of low impact defects in 60 business days. The CLEC's propose 30 business days for this same interval. See Item 9 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item No 9 and concerns the timeframe for correcting "low impact" software defects, which are defined as failures causing inconvenience or annoyance. The current timeframe for correcting "low impact" software defects is "best effort" because such defects have no immediate adverse impact to the users. As a result, correcting such defects does not and should not take a high priority in implementation, particularly when compared to other Change Requests. Nevertheless, BellSouth is willing to commit to correcting "low impact" software defects within sixty (60) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Sixty (60) business days is a reasonable amount of time to correct a defect that does not detrimentally affect performance or stability or otherwise adversely impact a CLEC.
38	5.0 – Step 5 Cycle Time	D 65	At this reference point the detailed step level language necessary to make the medium and low impact correction intervals discussed in Items 36 and 37 above operational. The proper intervals based on	This issue in dispute is related to Item Nos. 9, 36, and 37 concerning the timeframes for correcting "medium impact" and "low impact" software defects. As previously explained, BellSouth has proposed

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			<p>BellSouth's demonstrated capabilities are 20 and 30 days respectively.</p> <p>See Item 9 above for the full details of the CLECs' support for their proposed language.</p>	<p>reducing the intervals applicable to correcting true software defects in order to address the CLECs' request that software defects be corrected in a shorter period of time. BellSouth can only accommodate this request if the definition of a Type 6 Change Request is clarified to include only true software defects, as BellSouth has proposed in Item No. 8a. Absent this clarification, errors in documenting functionality are considered a Type 6 Change Request, which requires work analogous to adding a new feature to fix and which cannot be accomplished in a shorter amount of time.</p>
39	6.0 – Part 1 - NOTE	D 71	<p>BellSouth creates an issue with the timing of prioritization sessions that did not previously exist.</p> <p>See Item 15 above for the full details of the CLECs' support for their proposed language.</p>	<p>BellSouth has proposed language to clarify that a prioritization meeting should only be held when applicable.</p>
40	6.0 – Part 2 4 th & 5 th bullets	D 71-72	<p>BellSouth elected to address Section 6.0 – Part 2, bullets 4 and 5 as separate line entries. The CLECs' comments are all included in Item 40.</p> <p>BellSouth's green-line alternatives for these two bullets are parallel to positions discussed above in Items 11 through 19.</p> <p>In addition, bullets 7 through 10 (including two associated footnotes, all discussed below in Item 41) are proposed by BellSouth as additional explanation of their efforts to limit the CLECs knowledge of and participation in the process.</p> <p>The CLECs propose the on-going sharing of information at each step in the process where the information is likely to change (for example</p>	<p>BellSouth's response does not disagree with the CLEC-requested language but rather explicitly details what the CLECs will receive. That is, BellSouth provides the CLECs options so that they can select a rolling release plan they choose for the following year. The plans include associated available units of capacity estimated for each release and estimated capacity for each Type 4 and Type 5 Feature that is a candidate for prioritization. This information has been provided for 2003 planning.</p>

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			<p>prioritization, release package development, release management and implementation, and post implementation. The CLEC's proposal requests that data at these points be provided in the same groupings of categories to allow for tracking and the early detection of potential problems. Appendix I (to which the parties have agreed) provides post implementation data in distinct categories. The CLECs propose Appendix 1-A (See Item 48 below and page 117 of the Updated CCP Document) for the reporting of Pre-Release Capacity Forecast information and changes during the process steps using the same categories as in Appendix I. With this constancy in the reporting of the basic process data the effectiveness of the process can be analyzed and improvement plans developed.</p> <p>BellSouth's proposed language in contrast limits providing sizing information to only certain types of change requests, and only at a single point in the process (prioritization). Further it limits the sharing of information on releases to an annual snapshot in a format and grouping inconsistent with Appendix I making both in progress evaluation of the process and post implementation evaluations impossible (See Item 48 below and page 118 of the Updated CCP Document). BellSouth's proposal excludes the CLECs from access to information about the process as changes occur which are vital to the CLECs internal resource planning.</p>	
40a	6.0 – Part 2 5 th bullet	D 72	BellSouth elected to address Section 6.0 – Part 2, bullets 4 and 5 as separate line entries. The CLECs' comments are all included in Item 40.	This issue in dispute is related to Item Nos. 11, 18, 19, and 20 and concerns the information to be provided in connection with CLEC prioritization efforts. BellSouth is committed to providing complete and timely information to assist the CLECs, which earlier this year agreed to a process (contained in Appendix H) by which BellSouth

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				<p>provides the feature sizing for the Type 4 and Type 5 Change Requests that are candidates for prioritization. Once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, which contains a 12-month view of features scheduled, implemented or planned. The parties disagree about the specific feature sizing information that should be provided. The CLECs' Appendix I-A suggests that there is a set amount of capacity for each category they list by release. This is not the case. Production Releases, whether a CLEC or BellSouth Production Release, can have Types 2, 4, 5, or 6 Change Requests. In the case of the Type 4s and 5s, they are optional and entirely dependent upon whether it is a CLEC or BellSouth Production Release. In either case, during a "Pre-Release" point in time, these releases are open to any and all types as mentioned. Listing Units by category, as the CLECs' proposed Appendix I-A would require BellSouth do so, erroneously presumes that BellSouth knows how much capacity by category each release would have before prioritization and release planning by the CLECs. Although BellSouth could arbitrarily designate release capacity by category, there is no logical basis for doing so. As an alternative, BellSouth offers Appendix I-B, which provides pre-release capacity information, expressed in units, and provides the intelligence for the CLECs to determine the pre-release capacity available. It also allows for the flexibility and reality of how the Change Request types correspond to release types. For example, Type 6s and PSN mandates are predominantly targeted for maintenance releases, while Types 2s, 4s, and 5s are targeted for production releases in accordance with the BellSouth and CLEC Production Release guidelines. Lastly, Type 3s are targeted for the Industry Release. The information that BellSouth proposes to provide to the CLECs to assist in the prioritization effort,</p>

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41	6.0 – Part 2 – Bullets 7-10	D 72	<p>In footnote 14 BellSouth expressly states that the management and implementation of its own change requests and its own releases will be “outside of this process.” BellSouth’s proposal prevents the CLECs from being able to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.</p> <p>In Bullet 7 BellSouth uses the term “rolling release plan.” However, experience has proven that this is nothing more than an annual single point in time snapshot of the next year’s preliminary plans. For 2003, this snapshot was not delivered until May of 2002, illustrating that BellSouth is not currently performing any proactive planning based upon change requests submitted to it Change Control Group. The CLEC’s related proposals are for the forward looking quarterly updating and sharing of a true rolling release plan for the balance of the current year and the next based upon implementation of prioritized change requests within in a 60 week interval</p> <p>In Bullet 7, BellSouth further states that it will produce two views, with and without the inclusion of an Industry Standard Release and then require the CLECs to vote between the two. Industry Standard Releases have not and will not occur on an annual basis; the last one was in 1999 and the next one will not be until 2003. The CLEC’s related proposals call for the preparation and analysis of a number of alternatives for future release plans resulting in a consensus decision over a planning horizon that addresses all forecast needs, including infrastructure upgrades and industry standard upgrades as required. It is clear from the limited data that BellSouth has provided concerning</p>	<p>as outlined in Appendix I-B, is reasonable and should be adopted.</p> <p>The bullet points detail the options provided to the CLECs under BellSouth’s comprehensive prioritization proposal. That is, the CLECs have the option to select whether or not to have an Industry Release (Type 3s) for a given year or whether to focus on Production Releases (Type 4s and 5s). Furthermore, it defines the equal allocation of capacity between the CLEC and BellSouth Production Releases. Lastly, it defines the commitment to deploy features in a timely manner. This proposal provides the CLEC with the flexibility and options to make their own decisions on how to use the releases in the coming year.</p>

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			<p>2003 that their planning made no allowances for either the necessary infrastructure upgrade or industry standard releases – it was simply based on the assumption that the “2003 program demand would be similar to 2002.”</p> <p>In Bullet 8, BellSouth makes a half-hearted and inappropriate commitment that “Total CLEC and BST production releases are equal in estimated number of units capacity.” As discussed above in Item 17 there is no justification for this blind allocation of resources and it is in fact detrimental to the accomplishment of the prime objective of the CCP, timely and effective implementation of feature and defect change requests.</p> <p>In Bullets 9 and 10, BellSouth repeats its proposals to limit the scope of the process to “CLEC Production Releases” and “available capacity”. In footnote 14 it expressly states that the management and implementation of its own change requests and its own releases will be “outside of this process.” BellSouth’s proposal prevents the CLECs from being able to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.</p>	
42	6.0 – Part 4	D 75-76	<p>In Part Four many of the individual Items discussed above related to sizing, sequencing and the use of prioritization are repeated.</p> <p>BellSouth’s modifications and caveats include “for the release being scoped”, “for the next CLEC production release(s)”, “may develop several variations of release packages”, and “into this CLEC Production Release”. Related Items discussed above include 1, 4, 5,</p>	<p>This issue in dispute is related to Item Nos. 4, 7, 24 and 26, which concern the CLECs’ request that BellSouth devote unlimited release capacity to implementing every Change Request within 60 weeks of prioritization, which, for the reasons previously explained, BellSouth is unwilling to do. BellSouth has developed a comprehensive prioritization process that gives the CLECs the necessary tools to make an informed decision to prioritize features, that equitably</p>

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			<p>7, 8, 15, 17, 22, 24, 25, 26, 40, and 41.</p> <p>Footnote 15 states “Capacity estimates for change requests and releases will be used as a guide in determining how many change requests will be assigned to these releases.” clearly demonstrating that BellSouth is determining release capacity first without consideration of demand, and then limiting the number of changes that can be implemented based upon the arbitrarily determined release capacity.</p> <p>In addition, BellSouth provides four bullets labeled “Release Implementation Hierarchy”. The CLECs concur with the first three bullets as written, and would agree to the fourth with the addition of the following phrase “and may be assigned to any production release”.</p>	<p>distributes available release capacity, and that provides assurances that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs and subject to available capacity. BellSouth’s proposal, which has been endorsed by KPMG and the Florida Public Service Commission Staff, is reasonable and should be adopted.</p>
43	6.0 – Part 5	D 76-77	<p>In Part Five many of the individual Items discussed above related to Release Capacity forecasting, Allocation, and Reporting are repeated. Related Items include 11, 12, 13, 14, 16, 17, 18, 19, 20, 27, and 40.</p> <p>The CLEC’s proposal is clearly more comprehensive and as discussed above more consistent, with the objectives of the CCP, evaluation of its effectiveness and on-going improvement.</p> <p>The CLECs agree with and adopt the last bullet in BellSouth’s proposal “On an ongoing basis, Legacy System Releases will be posted to the website. See Appendix J.”</p>	<p>BellSouth’s proposed language outlines the Forecast and Planning Information that is now available to the CLECs. Most of these tools were not available at the time the CLECs drafted their proposed language or were recently implemented. All of this information was provided at the request of the CLECs and should provide the information necessary for their planning.</p> <p>BellSouth agreed and has provided the estimated units available for Type 3 (typically referred to as an industry release or ELMSx) and has provided the estimated units of capacity of the remaining releases. The remaining capacity is shown as CLEC Production Release(s), BellSouth Production Release(s) and Maintenance Releases. BellSouth’s proposed language details the actual deliverables and commitments.</p>

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				BellSouth's language again details how it will provide the information requested by the CLECs. BellSouth provided the information in a release management planning format in order for the CLECs to view it as a project timeline. Maintenance releases are provided with estimated units of capacity. Both public switch network and Type 6 changes are expected to be deployed in these releases. Type 2 (Flow Through) Features were provided with estimated Units of Capacity, along with estimates for Types 4 and 5 change requests. Type 3 is a standalone release and was provided as well.
44	10.0	O 88-96	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision. The joint development of an updated testing process is underway. It is anticipated that a workshop or other exchange of language for this section to resolve this issue will be held in the near future.	This issue is still under discussion by BellSouth and the CLECs.
45	11.0 – Terms & Definitions – Release - Production	O 104	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision.	This issue is still under discussion by BellSouth and the CLECs.
46	11.0 – Terms & Definitions- Release Capacity Measurement	D 104	This is Item 43 in the format of a terminology definition. See Item 43 and its other related Items. This definition will be changed to reflect the Commission's decisions on the underlying Items.	This issue in dispute is related to Item Nos. 11, 18, 19, 20, and 40a and concerns the information to be provided in connection with CLEC prioritization efforts. BellSouth is committed to providing complete and timely information to assist the CLECs, which BellSouth's proposal would do.
47	Appendix D	O 109-110	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision.	This issue is still under discussion by BellSouth and the CLECs.
48	Appendix I-A	D	The CLEC's proposed format is consistent with Appendix I and will	This issue in dispute is related to Item Nos. 11, 18, 19, 20, 40a, and 46

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	& I-B	117- 118	allow for direct evaluation of the process and the development of improvement plans. The BellSouth proposed format will not provide these capabilities. The BellSouth proposed format however does provide valuable information and should be approved as a supplemental format.	and concerns the information to be provided in connection with CLEC prioritization efforts. BellSouth is committed to providing complete and timely information to assist the CLECs, which BellSouth's proposal would do.
49	11:0 – Terms & Conditions – Defect Definition	D 101	This is Item 9 in the form of a terminology definition. See Item 9 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item Nos. 8a and 35 concerns the need to clarify a Type 6 Change Request as a true software defect, which would allow BellSouth to shorten the intervals applicable to implementing such Change Requests. The current definition of a Type 6 Change Request does not accurately define a software defect because it includes an oversight in documenting functionality. BellSouth's proposal to clarify this definition to include only true software defects would allow BellSouth to shorten the intervals applicable to implementing Type 6 Change Requests, as the CLECs have requested. Absent this clarification, errors in documenting functionality are considered a Type 6 Change Request, which requires work analogous to adding a new feature to fix and which cannot be accomplished in a shorter amount of time.