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July 25, 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 Nos. 960786A-TL and 981834-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC., TCG South Florida, Inc., AT&T Broadband Phone of Florida, LLC, Covad Communications, Florida Digital Network, ITC DeltaCom, WorldCom, Inc. and Network Telephone are an original and fifteen copies of Supplemental Post-Workshop Comments in the above-referenced docket.

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

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OPC
MMS
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OTH Hdq

TWH/amb
Enclosures
cc: Ms. Virginia Tate
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996	)	Docket No. 960786-A-TL
Petition of Competitive Carriers For Commission Action To Support Local Competition In BellSouth Telecommunications, Inc.'s Service Territory	)	Docket No. 981834-TP

Filed: July 25, 2002

SUPPLEMENTAL POST-WORKSHOP COMMENTS ON BEHALF OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC., TCG SOUTH FLORIDA, INC., AND AT&T BROADBAND PHONE OF FLORIDA, LLC; COVAD COMMUNICATIONS; FLORIDA DIGITAL NETWORK; ITC DELTACOM; WORLDCOM, INC.; AND NETWORK TELEPHONE

INTRODUCTION

The commercial experience workshop held earlier this year revealed that significant impediments still exist that bar ALECs from meaningful competition in Florida.[1] After that workshop, at the request of the Commission, ALECs submitted their *Comments*, identifying these barriers to competition and offering constructive recommendations for solutions to these problems. Since ALECs submitted their initial *Comments*, BellSouth has made little progress toward improving the possibility of robust competition by ALECs in this state. The

[1] *See Post Workshop Comments on Behalf of AT&T Communications of the Southern States, LLC, TCG South Florida, Inc., and AT&T Broadband Phone of Florida, LLC; Covad Communications; Florida Digital Network; ITC^Deltacom, Inc.; KMC Telecom, Inc.; WorldCom, Inc.; and Network Telephone*, filed March 18, 2002 (hereafter, *ALEC Comments*).

supplemental data filed by BellSouth on May 31, 2002 does not show positive progress.[2] It reveals that "in certain critical areas . . ., BellSouth simply does not understand or does not want to understand ALECs' needs and concerns."[3] BellSouth's *Supplemental Data* does not even respond to many of the issues raised by ALECs in the commercial experience workshop. In other areas, BellSouth's *Supplemental Data* does not address ALEC's key concerns. Consequently, the ALECs reaffirm that the Commission should not recommend approval under Section 271 of the Telecommunications Act of 1996 (the "Act") until the problems identified by the ALECs with BellSouth's Operational Support System ("OSS") have been resolved.

EXECUTIVE SUMMARY

ALECs' *Comments* identified a number of significant problems with BellSouth's OSS that prevent ALECs from competing in any meaningful manner with BellSouth in Florida. In ALECs' experience, these problems persist, and BellSouth's *Supplemental Data* does not contradict the day-to-day obstacles ALECs face in attempting to compete.

A. Preordering Problems

As stated in the *ALEC Comments*, preordering is potentially the most critical piece of the entire OSS process."[4] ALECs raised significant problems they confront with BellSouth's preordering systems:[5]

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[2] *See Post-Workshop Supplemental Data of BellSouth Telecommunications, Inc.*, filed May 31, 2002 (hereafter, "*BellSouth Supplemental Data*"). Although BellSouth failed to include page numbers in its *Supplemental Data*, ALECs have supplied such numbers for the sake of clarity. ALECs have designated the cover page of BellSouth's *Supplemental Data* as page 1.

[3] *ALEC Comments* at 2.

[4] *ALEC Comments* at 3, *citing* Tr. at 25.

[5] *ALEC Comments* at 3-15.

- BellSouth does not provide ALECs the ability to integrate preordering and ordering functions at parity
- BellSouth's Customer Service Records ("CSRs") are inaccurate
- BellSouth does not permit ALECs to view and resolve pending service orders
- BellSouth does not provide Facilities Reservation Numbers ("FRNs") via EDI at no cost
- EDI is not available for preordering[6]
- Significant issues related to LFACS are outstanding

BellSouth has neither addressed all of these points nor eliminated all of these deficiencies. For instance, CSR problems still exist. CSRs are *still* not updating in a timely manner, which complicates ALECs' efforts to provide excellent and timely service to its customers. Furthermore, ALECs do not receive adequate notification when order processing is complete.[7] Thus, ALECs do not receive information with which to update their records. In addition, CRIS/CABS CSR and Address Validation databases used by the Local Exchange Navigation System ("LENS") are not identical, which causes invalid clarifications if the CRIS/CABS CSR database is incorrect.

As another example, Loop Facility Assignment Control System ("LFACS") issues are still outstanding. BellSouth's databases are not adequately updated to show available facilities. After ALECs have issued disconnect orders, which would vacate tie assignments for reuse, BellSouth's databases still show the facilities are occupied. And, Loop Makeup information

[6] A change request for EDI pre-order has been scheduled for implementation, but has not yet been implemented. In the past, even approved change requests have been delayed by BellSouth. *See* Section VI, *infra*. These changes must therefore be implemented and tested before § 271 approval would be appropriate.

[7] Changes to address Billing Completion Notices are also in the change requests that have been approved. As with the change requests for EDI pre-order, Section 271 approval would not be appropriate before these changes have been implemented and tested.

often must be requested using the service inquiry process. For instance, between May 2, 2002 and July 1, 2002, 225 out of 721 DSL orders processed by Network Telephone required the submission of a service inquiry for the Loop Makeup, increasing cost and extending installation time by ten working days. KPMG Consulting, Inc. ("KCI") did not test the quality and quantity of the information in LFACS. BellSouth admitted at the Loop Pre-Qualification Tools seminar on July 9, 2002 that LFACS only contains information on approximately 51% of facilities region-wide. As a result, ALECs frequently are required to initiate the costly and lengthy manual loop makeup inquiry process. Therefore, ALECs continue to experience both old and new problems with preordering that cause ALECs competitive harm.

B. Ordering

In their *Comments*, ALECs identified several important problems that they were experiencing with ordering:[8]

- BellSouth's mechanized order processing is inadequate -- manual handling of orders is excessive
- BellSouth fails to remove ADSL USOC codes promptly
- BellSouth provides invalid clarifications
- BellSouth places local freezes on consumers' lines and fails to remove them promptly
- BellSouth provides improper and incomplete clarifications
- BellSouth's LCSC escalation process must be improved
- BellSouth returns incomplete FOCs
- BellSouth's Due Date Calculator "fix" must be verified

[8] *ALEC Comments* at 16-30.

- BellSouth's ordering systems experience frequent outages

BellSouth has either ignored or has failed meaningfully to address all of these issues. To the extent BellSouth addresses these issues at all in its *Supplemental Data*, ALEC commercial experience demonstrates that these issues are far from resolved. Flow-through performance remains unacceptably low and, in fact, has worsened. BellSouth's ordering systems continue to be frequently inaccessible to ALECs, and BellSouth still does not have a properly functioning due date calculator. BellSouth still mishandles ADSL USOC removal requests,[9] failing to remove ADSL USOCs after request by an ALEC -- sometimes even after the ALEC has received confirmation of removal from the Local Carrier Service Center ("LCSC"). Furthermore, errors in clarification notices are not promptly corrected.

In addition to these abiding problems, Network Telephone has experienced an additional ordering-related problem: BellSouth's telephone number reservation system is inadequate. After reserving a telephone number, the order is clarified indicating the telephone number is in use. Occasionally, when activating a telephone number previously reserved in LENS, an error message is received indicating that the telephone number is "not available in this switch." This can only be corrected by contacting the LCSC to remove a field identifier prior to releasing the order. Problems with ordering such as these continue to act as a bar to effective competition by ALECs in Florida.

[9] ALECs refer the Commission to the customer complaint in CATS 433650T for an example of the delay associated with a customer's attempts to get ADSL removed from the CSR.

C. Provisioning

ALECs presented several issues with provisioning, noting that this area affects customers most directly and, if defective, causes intense customer dissatisfaction.[10] BellSouth *Supplemental Data* did not respond to the issues raised by ALECs, which include:[11]

- BellSouth's provisioning accuracy is poor
- BellSouth prematurely disconnects ALEC customers migrating to UNE-P
- BellSouth issues an excessive number of pending facilities holds on ALEC orders and does not promptly resolve those holds
- BellSouth's jeopardy notice procedures are inadequate
- BellSouth improperly rejects disconnect orders
- BellSouth fails to provide timely provisioning of UCL-ND
- BellSouth fails to satisfy its obligations for line sharing
- BellSouth fails to follow procedures in provisioning ALEC line sharing orders

These problems, like the others raised in the *ALEC Comments*, persist. For example, BellSouth's technicians either do not receive or do not follow special delivery instructions. This results in connection at improper points or the customer not being available when the BellSouth technician arrives. BellSouth then asserts that the ALEC must place a "move" order, which forces the ALEC to incur additional order costs, disconnect costs, and non-recurring reconnect fees. It also causes delay in the customer's receipt of service. ALECs have also reported BellSouth-initiated cancellations on T1 orders due to pending facility status. These problems continue to impair ALECs' ability to compete effectively in Florida.

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[10] *ALEC Comments* at 30.

[11] *ALEC Comments* at 30-42.

D. Billing Policies

BellSouth has not provided this Commission any comfort that ALEC billing concerns have been addressed. The issues presented by ALECs in their *Comments* included:[12]

- Orders are delayed pending billing completion
- BellSouth has errors in its wholesale bills

BellSouth's *Supplemental Data* does not address these issues. In fact, ALECs continue to receive error-ridden bills, while BellSouth continues to be unresponsive to AT&T's attempts to reconcile those bills.

E. Maintenance and Repair Practices

Maintenance and repair concerns raised by ALECs also remain unaddressed. ALECs raised the following issues regarding BellSouth's inadequate maintenance and repair practices:[13]

- Loss of dial tone
- ALECs experience chronic repair troubles
- BellSouth inaccurately reports "No Trouble Found"
- BellSouth prematurely closes trouble tickets
- BellSouth attempts to make repairs outside of customers' business hours
- BellSouth's maintenance average duration demonstrates ALECs receive disparate treatment
- ALECs experience an excessive number of new install failures
- BellSouth does not accept troubles it causes during migration
- BellSouth does not notify ALECs once repairs are complete

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[12] *ALEC Comments* at 42-45.

[13] *ALEC Comments* at 45-55.

BellSouth has not addressed these issues in the field, and they are not addressed by BellSouth's *Supplemental Data*. ALECs still experience significant problems in all these areas. Customers still suffer BellSouth-caused loss of dial tone, and BellSouth still forces ALEC customers to wait an unreasonably long time for repairs to their service. Maintenance and repair problems cause immense competitive harm to ALECs by compromising ALECs' ability to provide high quality, reliable service to Florida customers.[14]

F. Data Integrity Issues

The integrity of Bellsouth's data is a problem raised by ALECs and identified by KCI in the third-party test. The problems persist. ALECs identified, and are still experiencing, the following problems with the integrity of BellSouth's data:[15]

- BellSouth's performance reports and performance data are inaccurate
- BellSouth applies unauthorized exclusions to its data
- BellSouth does not provide raw data necessary to verify the accuracy of BellSouth's reports
- Report validation problems BellSouth claims are corrected must be validated

In addition to these problems, which are ongoing, BellSouth fails to respond within a reasonable time to AT&T's requests for data reconciliation. Because of these problems with the integrity of BellSouth's data, ALECs and the Commission cannot assess accurately BellSouth's performance.

[14] *See ALEC Comments* at 46.

[15] *ALEC Comments* at 55-62.

G. Change Control Process

The Change Control Process ("CCP") is another area of concern identified by KCI in the third-party test that the ALECs confront daily. ALECs have expressed concern that BellSouth's CCP is deficient in many substantial respects.[16] The primary defect in BellSouth's CCP is excessive control over the CCP by BellSouth. ALECs' *Comments* detailed several fundamental changes BellSouth could make to its CCP that would make the CCP acceptable to ALECs. To date, BellSouth has not made these changes, and BellSouth's CCP remains deeply defective.

ALECs' experience with BellSouth's practices in all of these areas -- Preordering, Ordering, Provisioning, Billing, Maintenance and Repair, Data Integrity, and Change Control -- leads to the conclusion that robust competition among ALECs in Florida is not presently possible. ALECs detailed the difficulties they face competing in Florida in their initial *Comments*. BellSouth's *Supplemental Data* does not adequately address ALECs' concerns, nor does it establish that BellSouth has taken adequate steps to resolve the underlying issues that hinder competition. As explained in ALECs' initial *Comments*, and as further discussed in these *Supplemental Comments*, significant problems with BellSouth's OSS persist in Florida that require further corrective action by BellSouth before the pro-competitive principles of the Act may be satisfied.

[16] *ALEC Comments* at 62-65.

COMMENTS

I. PREORDERING

BellSouth has not responded adequately to ALECs' concerns regarding preordering problems. As stated in their March 2002 *Comments*, ALECs believe that preordering "is potentially the most critical piece of the entire OSS process."[17] BellSouth, however, has not provided an adequate response to any of the issues raised by ALECs. BellSouth's *Supplemental Data* similarly does not even address preordering.

II. ORDERING

ALECs continue to experience significant problems with ordering. In their *Comments*, ALECs described a number of critical deficiencies in BellSouth's ordering process, which BellSouth has failed to address. ALECs continue to be negatively impacted by these problems. As ALECs explained, until BellSouth corrects these deficiencies, ALECs will continue to experience competitive harm. For example, when ALEC orders fall out for manual processing, or BellSouth incorrectly returns valid LSRs for clarification, or if ALECs cannot place orders because BellSouth's system is down, customer service is unreasonably delayed. The following types of problems illustrate how ordering problems can cause customer dissatisfaction and deny ALECs a meaningful opportunity to compete, contrary to the principles of the Act.

A. Flow-Through Rates Remain Unacceptable And Are Worsening -- Manual Handling Of Orders Is Still Excessive

As ALECs demonstrated in their *Comments*, BellSouth excessively relies on manual processing to handle ALEC orders.[18] This practice is discriminatory, as BellSouth's flow-

[17] *ALEC Comments* at 3, citing Tr. at 25.

[18] *See ALEC Comments* at 16-17.

through rate for handling its own orders is nearly 100 percent. Meanwhile, an unacceptably high number of ALEC orders meander through the BellSouth ordering system at a snail's pace. This is because BellSouth-caused order fallout remains unacceptably high, while flow-through rates, both recently and historically, remain sub-par. While true parity between BellSouth and ALECs would be indicated by comparable flow-through rates for both, BellSouth's flow-through rate for ALECs still lags well behind even the most basic performance benchmarks. This problem is compounded by BellSouth's reluctance to remedy the situation through proper use of the Flow-Through Task Force ("FTTF") it suggests in its *Supplemental Data* will improve flow-through. Consequently, BellSouth's excessive manual handling of ALEC orders continues to pose a substantial impediment to ALECs' ability meaningfully to compete with BellSouth.

1. Both Manual and Partially Mechanized Processing Competitively Harm ALECs

Manual and Partially Mechanized order processing result in slow handling of orders and, consequently, delay service implementation for customers. In addition to delay, manual handling of orders increases both the cost of processing orders and the likelihood of error.[19] BellSouth's reliance on the FCC's discussion of electronic and manual orders in the *Georgia/Louisiana Order* is misplaced: ALECs' experience shows that BellSouth's manual handling of orders *does* cause significant delay and customer dissatisfaction, and *does* competitively disadvantage ALECs.[20]

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[19] *See ALEC Comments* at 17.

[20] Memorandum Opinion and Order, *In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana*, 2002 WL 992213 (F.C.C., May 15, 2002) (NO. FCC 02-147, CC Docket No. 02-35) (hereafter, "*GALA Order*") *cited in BellSouth Supplemental Data* at 39-40.

BellSouth takes approximately 18 hours to return a firm order confirmation ("FOC") or rejection notice for electronically submitted orders that fall out for manual processing. By contrast, BellSouth takes an average of only fifteen minutes to return a FOC or rejection notice when the order is processed electronically. An eighteen-hour delay is significant and, in this case, below the performance benchmarks set by this state of an 85% return rate within ten hours.[21]

BellSouth itself admits that it makes mistakes, "particularly when there is human intervention associated with processing [an] order."[22] For example, during the manual data entry process, BellSouth has inadvertently removed from orders features, class of service, and lines. In addition, when ALECs validate orders in CLEC Service Order Tracking System ("CSOTS"), call forward numbers have been incorrectly entered requiring a call to the LCSC to correct. Manual processing by BellSouth causes competitive harm to ALECs.

2. BellSouth-Caused Fallout Rates Remain High

The frequency with which orders are handled by the LCSC remains unacceptably high. The sheer number of local service requests ("LSRs") handled by the LCSC is staggering: in three of the first four months of 2002, the LCSC handled over 130,000 LSRs per month. In April 2002 alone, the LCSC handled 134,069 LSRs. Although BellSouth asserts that the percentage of LSRs handled by the LCSC has decreased,[23] ALECs' experience refutes such a contention. For

[21] *BellSouth Supplemental Data* at 21. As noted by BellSouth, this Commission increased this benchmark to 95%, effective in May 2002. Florida PSC Order No. 000121-TP, Docket No. 960786B-TP, filed June 1, 2001. Given BellSouth's deficient performance in FOC timeliness to date, neither ALECs nor this Commission can be assured that BellSouth will be able to meet this elevated performance standard.

[22] *See ALEC Comments* at 17-18, *citing* Tr. at 208.

[23] *BellSouth Supplemental Data* at 20.

instance, in May 2002, 19.97 percent of LSRs fell out for manual processing due to BellSouth design or system error. That rate is no better than the rates for January 2002 or the preceding months in 2001.[24]

BellSouth attempts to blame the problem of order fallout on ALECs by alleging that the huge fallout rate is attributable to ALEC errors.[25] Yet, BellSouth's claim that a significant portion of LSRs handled by the LCSC are "due to ALEC errors"[26] is incorrect. In fact, whereas BellSouth-caused order fallout was nearly 20 percent in May 2002, the rate of ALEC-caused order fallout for that month was a mere 4.64 percent:

Sources of Manual Fallout Load on the LCSC

2002	% BellSouth Designed Fallout and System Error	% ALEC Caused Fallout
January	19.37%	4.05%
February	20.37%	4.55%
March	21.00%	4.65%
April	19.65%	4.08%
May	19.97%	4.64%

Accordingly, BellSouth, not ALECs, causes the vast majority of these orders to fall out for manual processing.

[24] Indeed, approximately 30% of the total LSRs received by BellSouth required some sort of manual handling during the first four months of 2002 (January: 27.87%; February: 29.54%; March: 30.28%; April: 27.99%).

[25] *BellSouth Supplemental Data* at 20-21.

[26] *Id.*

3. Flow-Through Rates Remain Low

Flow-through rates for ALEC orders have been, and continue to be, below the performance benchmarks established by this and other state commissions. While BellSouth contends that its flow-through rate for ALEC orders is improving, BellSouth presents no evidence in its *Supplemental Data* that it exceeds or even meets flow-through benchmarks consistently.[27] Sporadic compliance is insufficient to promote robust competition in this state. ALECs must be assured that their orders will flow through BellSouth's systems reliably. The most accurate measure of BellSouth's flow-through rate demonstrates BellSouth's performance is woefully short of the performance benchmarks. Indeed, the third-party test confirmed the inadequacy of BellSouth's flow-through performance.

BellSouth's Percent Flow-Through Rate ("PFTR") remains significantly below the PSC-set performance benchmarks in each order category, and its PFTRs have shown little or no improvement over this current year. By way of illustration, for unbundled network element ("UNE") LSRs, the ALEC PFTR of 82.6 percent in May 2002 was below the rate of 85.5 percent in January 2002. For residential resale orders, the ALEC PFTR in May 2002 (86.7 percent) was *lower* than that in December (89.5 percent) and in January 2001 (91.35 percent). For business resale orders, the May 2002 PFTR of 69.5 percent was lower than the December 2001 rate of 74.07 percent. *None* of the May 2002 PFTRs attained by BellSouth met any of the applicable benchmarks set by the PSCs in its region. In fact, during the period of November 2001 through April 2002, Florida's PFTR trends *declined* in the categories of residential resale, business

[27] *See, e.g., BellSouth Supplemental Data* at 36-38.

resale, *and* UNE.[28] BellSouth's PFTRs in Florida lag behind the entire nine-state region in every product but local number portability ("LNP").[29] These numbers demonstrate that BellSouth's PFTRs in Florida are unacceptably low and declining.

BellSouth's performance has been equally deficient over the long term. During the last 14 months for which it has reported data, BellSouth's PFTRs for residential and business resale orders in Florida have *never* met the benchmarks for these different product lines. Only in one month (January 2002) did BellSouth's PFTR for UNE orders meet the applicable benchmark in this state of 85 percent.[30]

Even if BellSouth could demonstrate that its PFTRs have improved -- which it cannot do -- the PFTR is still an inflated measure of BellSouth's flow-through performance. Only BellSouth's "Achieved Flow-Through Rate" ("AFTR") can accurately satisfy the FCC's requirement that flow-through rates consider only manually processed orders that fall out either because of BellSouth's failure to design them to flow through, or because of errors in BellSouth's system design. BellSouth's calculation of the PFTR measure excludes ALEC orders that BellSouth has not designed to flow through, a substantial percentage of electronically-submitted LSRs. Thus, on a regional basis the PFTR for business resale orders is typically 21 or 22 percent lower than the PFTR for business resale orders. In other words, BellSouth has designed its systems so that 21 or 22 percent of orders cannot flow through. This percentage of manually processed orders that fall out "by design" generally has exceeded 30 percent for LNP

[28] *See* Exhibit 1.

[29] *See* Exhibit 2.

[30] *See* Exhibit 3.

orders, and 12 percent for UNE orders. In other words, the PFTR is deceptively higher than the AFTR. Only the AFTR can accurately express the degree of competitive harm that BellSouth's flow-through performance causes ALECs. An analysis of BellSouth's AFTR in this state reveals that it is even further below benchmarks than its PFTR. In April 2002, in Florida, BellSouth's AFTR was 72% for residence, 50% for business, 64% for UNE, and 59% for LNP. As with PFTR, AFTR is low and declining. BellSouth's AFTR in Florida also lags significantly behind the nine-state region for residential resale and UNE products.[31]

KCI's third-party test in this state confirms that BellSouth's flow-through rate remains unacceptably low. In its Draft Final Report, KCI found that even after two retests, less than 75 percent of UNE orders that were expected to flow through actually flowed through, well below the 85 percent benchmark. KCI also found that BellSouth has not satisfied KCI's evaluation criteria in a number of areas, including whether BellSouth's systems process either UNE or LNP order transactions in accordance with published flow-through rules In these, and other areas of deficiency, KCI found that "significant issues remain unsolved" as a result of BellSouth's failure to satisfy the evaluation criteria. These continued failures by BellSouth all have the effect of denying ALECs parity of access and a meaningful opportunity to compete.

BellSouth's reliance on the FCC's finding that "a minimal number of orders cannot be ordered electronically" is misplaced.[32] The rate of order fallout has been far greater than "minimal." Furthermore, the rate of order fallout can be expected to increase, based on BellSouth's admission in its *Supplemental Data* that the volume growth in UNE-P orders has

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[31] *See* Exhibit 4.

[32] *See BellSouth Supplemental Data* at 38.

lowered its flow-through rates. Increases in volume are to be expected, and a supposedly well-designed system must be able to accommodate such increases. By BellSouth's reasoning, one can only expect to see continued increases in the rate of order fallout as BellSouth introduces new products and ALECs continue to attempt to enter the market.

Therefore, it is readily apparent that BellSouth's ordering systems continue to yield unacceptably low flow-through rates.[33] Moreover, BellSouth has not kept its commitments to improve flow-through performance. BellSouth touted to the FCC and in its *Supplemental Data* the Flow-Through Task Force, which BellSouth says will improve flow-through. BellSouth, however, thwarts the effectiveness of the FFTF. For example, although BellSouth represented to the FCC that it had implemented eight additional flow-through improvement features in February and March 2002, with "ten more improvements . . . targeted for May,"[34] BellSouth has implemented only *seven* such features thus far in 2002. BellSouth's release schedule calls for the implementation of only six additional flow-through improvements during the remainder of 2002. Even if BellSouth implements those improvements as scheduled, it will have implemented a total of only 13 FTTF improvements during all of 2002, little more than two-thirds of the amount that BellSouth had previously promised to implement between February and May 2002 alone. Furthermore, more than 15 FTTF prioritized improvements have no scheduled implementation dates.[35] Based upon these facts, ALECs' concerns about the FTTF are hardly "unfounded."[36]

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[33] Exhibit 3 demonstrates BellSouth's abysmal flow-through rates -- both PFTR and AFTR -- from April 2001 through May 2002.

[34] *GALA Order* at ¶ 146.

[35] See Exhibit 5, *Individual Flow Through Task Force Item Status Since Initiation of the Task Force in February 2001.*

[36] *See BellSouth Supplemental Data* at 44.

BellSouth's flow-through rate remains unacceptably low, while its order fallout rate remains high. These problems are a result of BellSouth-caused error, and ALECs continue to experience competitive harm from such low flow-through rates. Nonetheless, BellSouth evades the effort necessary to improve flow-through. Accordingly, § 271 approval is not appropriate.

B. BellSouth's Ordering Systems Continue To Experience Frequent Outages

ALECs continue to experience substantial problems with BellSouth's ordering interface availability. The availability that BellSouth reports does not reflect ALEC commercial experience. Again, BellSouth relies upon the FCC's *GALA Order* to assert that its ordering system does not suffer from significant problems that hinder ALECs' ability to compete.[37] The facts of BellSouth's ordering systems' performance in this state demonstrate that this reliance is misplaced.

BellSouth uses flawed data to demonstrate that its ordering interface is sufficiently available. BellSouth admits in its *Supplemental Data* that "only full outages are calculated for" BellSouth's "interface availability schedule."[38] It is not only full outages that severely impair the ability of ALECs to compete. When interface systems are slow, ALECs' ability to order products and services from BellSouth is severely limited. Yet, BellSouth's representation of its ordering interface availability ignores the less-than-complete outages that nonetheless substantially interfere with ALECs' ordering capabilities.

BellSouth further artificially inflates its ordering interface availability measure by including servers that are not actually available for processing ALEC orders in its calculation of

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[37] *Id.* at 23. In addition to being factually inaccurate, BellSouth's argument overstates the applicability of the FCC's determination in the *GALA Order*, which was limited to the facts in that matter.

[38] *BellSouth Supplemental Data* at 24.

interface availability. The interface availability measure shows the percentage of hours that BellSouth's interfaces are available for ALECs to use in conducting business with BellSouth, and is calculated by dividing the number of hours the interfaces were not available by the total number of available hours. By counting the "availability" of its test servers and back-up servers -- which are not even used to process ALEC orders -- BellSouth artificially inflates its interface availability measure by diluting the percentage of unavailable hours.

ALECs continue to be competitively harmed by problems with BellSouth's ordering interface availability. Furthermore, BellSouth's data regarding its ordering system availability is completely unreliable.

C. Problems With BellSouth's Due Date Calculator Continue

ALECs continue to experience problems related to the due date calculator. Again, BellSouth overstates the FCC's findings concerning its due date calculator in the *GALA Order*.[39] The FCC found only that AT&T had not demonstrated a systemic problem with the newly implemented due date calculation software.[40] The Commission did not express blanket approval of BellSouth's due date calculator, and indeed warned that "should BellSouth's performance in this area deteriorate or become a systemic problem, we are prepared to pursue appropriate enforcement action."[41] As recent events have demonstrated, these conditions have been met and ALEC's concerns about BellSouth's recent software "fix"[42] have been confirmed: the performance of BellSouth's due date calculator has declined and is indeed a systemic problem.

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[39] *BellSouth Supplemental Data* at 31-35.

[40] *GALA Order* at ¶¶ 132-134

[41] *GALA Order* at ¶ 134.

[42] *See ALEC Comments* at 28-29.

In March 2002 alone, BellSouth's due date calculator was unable to calculate due dates for 3,375 orders. A properly designed due date calculator would not fail in so many instances.[43] Hence, BellSouth's due date calculator is fundamentally flawed, and suffers substantial failures in practice.

Furthermore, the defects in BellSouth's due date calculator are systemic. Although BellSouth attempts to minimize the significance of the problem by asserting that the 3,375 errors represent less than one percent of electronically submitted orders, those errors account for nearly eight percent of all BellSouth system errors in March 2002, the largest of any of the specially identified BellSouth errors in that report.

It is clear that BellSouth's due date calculator performance is unacceptably low. Further, because of the volume of errors it causes, BellSouth's due date calculator is a systemic problem. Therefore, this problem remains unresolved. Furthermore, this problem continues to cause competitive harm to ALECs, because ALEC customers, like BellSouth customers, expect the ALEC to be able to tell them the date on which service will be installed while they are on the line.

III. BILLING

ALECs continue to endure critical problems with BellSouth's billing, and BellSouth continues to ignore ALECs' attempts to reconcile these problems. In the *GALA Order*, the FCC stated that, as part of its obligation to provide nondiscriminatory access to its OSS, "BellSouth must provide competing carriers with complete and accurate reports on the service usage of competing carriers' customers in substantially the same time and manner that BellSouth provides

[43] ALECs note that, were BellSouth to conduct adequate pre-release testing of its software—an ongoing concern of ALECs and one addressed herein at Section VI—such a fundamental defect should have been detected pre-release.

such information to itself, and wholesale bills in a manner that gives competing carriers a meaningful opportunity to compete."[44] BellSouth, however, has not done so.

The daily usage files and wholesale bills that AT&T has received from BellSouth contain numerous errors. For example, BellSouth has billed AT&T several hundred thousand dollars for originating switching charges even when the traffic originates on AT&T's switch; BellSouth is billing AT&T monthly for one-time charges associated with collocations; BellSouth has failed to bill AT&T for local minutes of use for a six-month period; BellSouth sends AT&T bills on new accounts that erroneously list past due balances; and BellSouth sends *retail* bills to AT&T. In addition, BellSouth has assessed late payment charges against AT&T when payment on bills was not overdue as defined in the parties' interconnection agreement.

BellSouth's billing errors are compounded by its lack of responsiveness. Each time AT&T receives errors on its bills, it contacts BellSouth and attempts to resolve the problem through mutual collaboration. Under the interconnection agreement between BellSouth and AT&T, BellSouth is required to resolve a claim of billing problems within 60 days after receiving the claim from AT&T. However, BellSouth has failed to resolve billing problems in a timely manner.

Many of AT&T's billing problems with BellSouth are unresolved even though AT&T first filed claims raising them six or more months ago. For example, AT&T first raised the issue of BellSouth's erroneous assessment of late payment charges in August 2001, and the issue of BellSouth's erroneous billing of originating usage in December 2001. BellSouth, however, did not even provide a response to these claims until June 2002. Such behavior, unfortunately, is

[44] *GALA Order* at ¶ 173; *see also, Massachusetts 271 Order* at ¶ 97; *New York 271 Order* at ¶ 226.

typical of BellSouth. BellSouth did not provide any written response to at least 12 of the 23 claims that AT&T filed between February 2001 and March 2002 until more than 30 days after their submission.

In AT&T's experience, BellSouth's lack of responsiveness to billing problems is the worst of any RBOC. The frequent billing errors by BellSouth, together with the failure of BellSouth to address them in a timely manner, severely impairs an ALEC's ability to provide timely and accurate bills to its customers. In such circumstances, an ALEC does not have a meaningful opportunity to compete.

IV. MAINTENANCE AND REPAIR

As noted in the *ALEC Comments*, loss of dial tone is "the most significant maintenance and repair issue facing ALECs in Florida."[45] Florida Digital Network continues to experience a high incidence of no dial tone situations caused by BellSouth. Florida Digital has attempted to resolve this defect informally with BellSouth, but the problem still persists. This abiding critical flaw in BellSouth's service continues to cause competitive harm to ALECs in Florida.

Network Telephone's repair statistics furnished as part of the commercial experience workshop were not addressed by BellSouth. Network Telephone's experience is that it takes BellSouth much longer to fix repair troubles on Network Telephone loops than any data from BellSouth's measurements reveal. BellSouth's reported Service Quality Measure ("SQM") data for May 2002, which is the latest available on-line, shows the Maintenance Average Duration for Network Telephone trouble tickets averages six hours. Yet, Network Telephone's own data, taken from its own Network Operations Center individual customer repair tickets from May,

[45] *ALEC Comments* at 46-48.

show that BellSouth takes over *forty* hours to close trouble tickets on Network Telephone loops.[46] Moreover, also for May 2002, the average time it took BellSouth to resolve or call back Network Telephone on troubles that were caused by BellSouth was almost thirty hours. In all of these instances, the ALEC's customer's service was either inoperative or degraded. The average time it took BellSouth to resolve or call back Network Telephone when it reported telephone number problems on TAFI was over thirty-five hours. In these instances as well, the customers had either degraded service or no service at all. In every one of these instances, BellSouth was the cause of the problem.

Network Telephone's records and Florida Digital Network's experience show that BellSouth subjects ALECs and their customers to interruptions and astounding delays in repair service. By forcing ALECs' customers to endure such service interruptions and lengthy delays, BellSouth places ALECs at a significant competitive disadvantage.

V. THE INTEGRITY OF BELLSOUTH'S DATA CONTINUES TO BE IN QUESTION

In their initial *Comments*, ALECs demonstrated that BellSouth's self-reported performance data were flawed in several important respects. Despite BellSouth's assertions to the contrary,[47] AT&T's continued commercial experience demonstrates that these data integrity problems persist. BellSouth, for example, fails to provide ALECs access to all of its unprocessed raw data and continues to unilaterally modify the rules for its data calculations. In addition, BellSouth's performance measures statistics are distorted by errors and by BellSouth's selective

[46] It is possible, of course, that this discrepancy indicates the presence of other data integrity issues in addition to those discussed herein at Section V.

[47] *BellSouth Supplemental Data* at 7-8.

and arbitrary inclusions to and exclusions from data. Finally, BellSouth continues to unreasonably delay its response to AT&T's data reconciliation questions.

A. BellSouth Does Not Provide ALECs Or This Commission Access to All Unprocessed Raw Data

As this Commission is aware, BellSouth provides ALECs access to its self-reported performance data and reports via its Performance Measures and Analysis Platform ("PMAP"). The raw data files that are made available to ALECs in PMAP, however, are processed such that certain data are excluded. BellSouth, for example, does not provide the raw data transactions or records for LSRs that are excluded, either inappropriately or appropriately, from BellSouth's performance reports. Accordingly, ALECs cannot access this important information. ALECs require access to the unprocessed raw data to verify whether BellSouth has accurately applied these exclusions and to verify the accuracy of BellSouth's performance measurements reports. In addition, access to the unprocessed raw data is critical to ALECs' ability to evaluate discrepancies in BellSouth's reports and to identify whether BellSouth has applied unauthorized exclusions to its performance data.

B. BellSouth Applies Unauthorized Exclusions To Its Performance Data

A significant problem with BellSouth's performance data is that BellSouth continues to apply unauthorized exclusions to its performance data calculations. BellSouth's SQM and Raw Data User Manual sets forth certain exclusions that BellSouth applies to some of its data calculations. The problem ALECs continue to experience is that BellSouth applies exclusions to its data that are not detailed in either guidance document. These undocumented, or unauthorized exclusions prevent ALECs and this Commission from verifying the accuracy of BellSouth's reports and from assessing the quality of service BellSouth provides to ALECs in this state.

For example:

- BellSouth excludes from the LNP Flow-through report for Total Mechanized LSRs those LSRs received in the LNP gateway in a reporting month, but that receive a FOC or clarification "after the snapshot of data" is taken;
- BellSouth excludes from numerous performance reports LSRs that are received in one reporting month but that receive a FOC or clarification in the subsequent month; and
- BellSouth excludes from the % Rejected LSRs report LSRs in which a product code could not be identified or for which a state was not identified.

Without a complete understanding of how BellSouth's calculates its performance measures data and what data is used in BellSouth's performance reports, neither this Commission nor ALECs can understand the meaning of BellSouth's reports or verify their accuracy.

C. BellSouth's Performance Measures Data Are Distorted by Error, Mischaracterizations, and Inappropriate Inclusions of Data

BellSouth's performance data is further rendered unreliable because of simple errors in that data. For instance, analysis of BellSouth's Order Completion Interval data indicates that 4,174 completion notices have no corresponding data regarding the completed orders. Whether these 4,174 completion notices are not actually completion notices or BellSouth has excluded the data for the corresponding completed orders, BellSouth's data is not accurate.

Furthermore, BellSouth improperly includes certain figures in calculations or mischaracterizes the data altogether, resulting in inaccuracies. For example, the figure for LNP Flow-Through Auto-Clarifications is an important measure to help the Commission and ALECs determine flow-through rates. However, BellSouth admits that it may include in the LNP Flow-

Through Auto Clarification figure certain LSRs that fall out for manual processing or that have been clarified by a BellSouth service representative. Similarly, BellSouth also admits that manually-generated LSRs may be counted in its LNP Flow-Through Issued Service Orders measure. The obvious result of these practices is to artificially inflate these important performance measures data. Given the errors in BellSouth's data and data calculations, neither the Commission nor ALECs can accurately discern BellSouth's performance as an Incumbent Local Exchange Carrier ("ILEC").

Finally, BellSouth may miscategorize Fully Mechanized LSRs as Partially Mechanized LSRs in its FOC Timeliness Report. FOC Timeliness is an important measure of customer satisfaction and is therefore highly indicative of ALECs' ability to compete in Florida. KCI's Florida third-party test revealed that BellSouth's FOC Timeliness data may be artificially inflated because, under the SQM, a slower return rate is acceptable for Partially Mechanized FOCs[48] than is acceptable for Fully Mechanized FOCs.[49] Hence, BellSouth can mask sluggish performance for Fully Mechanized FOCs by simply categorizing them as Partially Mechanized FOCs. Accounting for FOC Timeliness in this manner renders the FOC Timeliness Report useless for its proper purpose and further complicates the task of ALECs and this Commission of evaluating BellSouth's performance as an ILEC.

[48] According to the SQM, BellSouth should return 95% of Partially Mechanized FOCs to ALECs within ten business hours of the LSR. *See BellSouth Service Quality Measurement Plan (SQM), Florida Performance Metrics, Measurement Descriptions Version 2.00,* January 23, 2002, at 2-26.

[49] Again under the SQM, BellSouth should return at least 95% of Fully Mechanized FOCs to ALECs within three hours of the LSR. *See id.*

D. BellSouth Continues to Unreasonably Delay Its Responses to AT&T

To make matters worse, when AT&T attempts to resolve these many data integrity issues with BellSouth, BellSouth's response time is unreasonably long. During 2000 and 2001, AT&T experienced lengthy delays in obtaining responses from BellSouth. In 2001, for example, the average length of time for AT&T to receive a response was over seven weeks. One response took over twenty-four weeks. Since March 2002, after a brief improvement in response time, BellSouth's responses have again been untimely. BellSouth's conduct when pressed for answers on the integrity of its data indicates that it is "unwilling to resolve the data integrity questions that AT&T has raised in a business-to-business setting."[50]

BellSouth's unreasonable delays in response time are unacceptable. As support for its decision rendered in the *GALA Order*, the FCC relied in part on its conclusion that BellSouth was willing to "engage in data reconciliations with any requesting carrier."[51] BellSouth has shown itself unwilling to engage in such a process. AT&T proposes to the Commission that AT&T and BellSouth work with the Commission to implement a solution to this problem. AT&T proposes the following procedure: BellSouth should acknowledge receipt from an ALEC of a request for reconciliation within 24 hours. Within five business days of receiving the request, BellSouth should notify the requesting ALEC of a commitment date by which time the ALEC will receive a complete response. Such commitment date should be within fifteen days of BellSouth's receipt of the ALEC's inquiry. If BellSouth cannot provide a response within fifteen business days of the request, its response to the ALEC should explain the reason for the delay,

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[50] *See* letter from Denise C. Berger (AT&T) to Rebecca N. Hazelwood (BellSouth), dated July 15, 2002 (attached as Exhibit 6).

[51] *GALA Order* at ¶ 18.

and a copy of that response should be filed with the Florida PSC. Such a procedure would provide a simple means to ensure timely responses by BellSouth to ALEC requests for reconciliation, and would help BellSouth achieve the standards anticipated in the FCC's *GALA Order*.[52]

Without complete and accurate data, neither the Commission nor ALECs can appropriately evaluate whether BellSouth is satisfying its obligation to provide nondiscriminatory access to local services. BellSouth does not provide such accurate and complete data. Furthermore, when asked for explanations for this problematic data, BellSouth delays unreasonably in responding. In all, BellSouth's performance cannot be accurately assessed, and ALECs have been unable to resolve this problem with BellSouth.

VI. CHANGE CONTROL ISSUES

BellSouth has not addressed ALECs' concern regarding BellSouth's inadequacies with respect to change control requests. Without an adequate change control process, which is required under Section 271, ALECs are not afforded a meaningful opportunity to compete against the ILEC. Resolution of this issue is critical to ALECs.

BellSouth generally asserts in its *Supplemental Data* that its correction of defects is effective and timely, and that its testing protocol is sufficient.[53] BellSouth relies heavily on the *GALA Order* to support its assertions.[54] However, events since the *Order* show that BellSouth's CCP does not satisfy the requirements of Section 271. Indeed, BellSouth can no longer satisfy

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[52] *See id.*

[53] *See BellSouth Supplemental Data* at 9-13, 30.

[54] *BellSouth Supplemental Data* at 9-11.

the factors the FCC considered in that *Order* to determine whether its management plan affords ALECs a meaningful opportunity to compete.

For example, BellSouth still exerts unilateral control over the design and operation of the CCP, refusing to consider or accept any change in the CCP that could end the core deficiencies in the CCP: BellSouth's exclusive control over the prioritization, implementation, sequencing, and scheduling of change requests. ALECs have attempted to resolve this issue with BellSouth through negotiation to no avail. The FCC assumed in the *GALA Order* that this impasse would be resolved by the Georgia PSC, but that has not occurred. BellSouth continues to deny ALECs "substantial input in the design and continued operation of the change management process," and hence, ALECs do not yet have a "meaningful opportunity to compete."[55] Hence, BellSouth has not met the requirements of Section 271.

Furthermore, BellSouth continues to fail to share release capacity information with ALECs and, hence, ALECs cannot make informed decisions regarding prioritization of proposed changes. BellSouth has even defied the expectations of the FCC as expressed in the *GALA Order* by failing to provide sizing information to ALECs for past, pending, and future releases scheduled for 2002. BellSouth has provided sizing information for less than 60 percent of the 42 change requests that had not yet been scheduled for implementation as of May 22, 2002. Furthermore, as of May 22, 2002, BellSouth had provided no individual request sizing information regarding the changes it expects to include in the remaining software revisions to be released in 2002. Finally, BellSouth has not provided ALECs with information regarding the allocation of capacity in forthcoming releases to repair defects. This latter failure is especially

[55] *See GALA Order* at ¶ 179.

prejudicial to ALECs, as defect change requests have accounted for more than 70 percent of the change requests actually implemented by BellSouth. In all respects, BellSouth's failures to share release capacity information prevent ALECs from participating in choosing which changes will be made, and when. Because this information related to BellSouth's CCP is not "clearly organized and readily accessible" to ALECs, BellSouth's CCP denies ALECs a meaningful opportunity to compete.[56]

BellSouth's implementation of change requests remains inordinately slow. Contrary to the FCC's finding in the *GALA Order*, defects have not "been corrected quickly and within the timeframes set by the Change Control Process."[57] For example, the *GALA Order* contemplated that improvement of flow-through features would be achieved by Release 10.5, which was scheduled to occur around the time of the Order. That release, however, was postponed, and when released, was plagued with defects. Since then, subsequent releases, which were to contain some of the "Top 15" change requests prioritized by the ALECs, have been postponed by as much as over a month, and the next release is not scheduled until the end of August. Indeed, BellSouth is facing a significant backlog of change requests, twenty-one of which BellSouth itself has validated as defects. One-third of these BellSouth-validated defects were submitted more than 120 days ago, four of them were submitted at least fourteen months ago, and one has gone uncorrected since September 2000.[58] Forty-two change requests in "Candidate Request"[59]

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[56] *See id.*

[57] *See GALA Order* at ¶ 195.

[58] *See* Exhibit 7, *Overall Defect Change Control Process Back Log: Overall Defect Change Request Back Log.*

[59] A "Candidate Request" is a change request that has completed change review and prioritization and is ready to be scheduled for implementation.

status have no scheduled implementation date.[60] BellSouth does not plan to begin to reduce this backlog until May or June of 2003. BellSouth's implementation of change requests is, therefore, unacceptably slow.[61] Given the rate at which BellSouth implements these change requests, many of which are significant defects, the CCP process still requires substantial revisions in order to allow ALECs a meaningful opportunity to compete.

The number and severity of defects in Release 10.5 reveal the falsity of BellSouth's assertions that its testing is sufficient.[62] BellSouth's testing environment is not stable and does not adequately mirror production, as it is required to do.[63] The sheer volume of defect change requests -- which have accounted for more than 70 percent of all change requests implemented by BellSouth -- reflects BellSouth's failure to conduct adequate internal testing prior to implementation. In the *GALA Order*, the FCC admonished that, in spite of its finding, real-world performance by BellSouth related to defect change requests could prompt enforcement action, particularly where BellSouth's performance "substantially degrades OSS performance."[64] With its latest release, BellSouth has shown itself incapable of conducting adequate pre-release testing: in Release 10.5, pre-release testing revealed two low impact defects, whereas fifteen additional defects (including eight high-impact and six medium-impact defects) were discovered shortly after release. Additionally, KCI reported at the July 12th workshop it had determined that

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[60] *See* Exhibit 8, *Change Control Process Back Log: Overall Feature Change Request Back Log.*

[61] *See* Exhibit 9, *Change Control Process Back Log: 2002 Implementation Analysis.* This exhibit analyzes BellSouth's overall implementation of Change Requests in 2002.

[62] *See, e.g., BellSouth Supplemental Data* at 11.

[63] *See GALA Order* at ¶ 187.

[64] *GALA Order* at ¶ 195.

an additional five software defects and four documentation defects were related to this release. These figures belie BellSouth's contention that it delayed implementation of this release by two weeks to eliminate or develop workarounds for defects.[65]

Had BellSouth implemented a stable and adequate testing environment, it should have detected at least some of these significant defects during the testing phase. BellSouth's failure to implement an appropriate testing environment denies ALECs a meaningful opportunity to compete because of the impact of such a failure on ALECs' access to BellSouth's OSS.

Finally, BellSouth does not even comply with its own CCP. For example, the CCP requires BellSouth to correct "high impact" change requests within 10 business days, "medium impact" defects within 90 business days, and "low-impact" defects with "best effort," although BellSouth has committed to a 120-day interval.[66] BellSouth, however, frequently falls far short of complying with these deadlines. For example, as stated above, a number of defect change requests in the current backlog are already more than 120 days old, but have not even been scheduled for implementation. The majority of the defect change requests that have been scheduled for implementation in 2002 will be more than 120 days old at the time of implementation – and two of those requests will be 200 and 412 days old.

KCI's Florida third-party test recognized these problems with CCP compliance. In particular, KCI found that BellSouth classified certain defects as enhancements, failed to open Type 6 (defect) change requests for the defects associated with the system enhancements, and failed to adhere to the intervals for validating and opening defects. KCI concluded that

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[65] *BellSouth Supplemental Data* at 11-12.

[66] *See GALA Order* at ¶ 195 n.744.

BellSouth's failure to follow the CCP in such situations "may result in the [ALEC's] inability to efficiently execute transactions with BellSouth, resulting in [ALEC] customer dissatisfaction."

To summarize, BellSouth's CCP remains seriously inadequate because of BellSouth's continued unilateral control of the process. BellSouth unilaterally decides which change requests will be implemented, and when. BellSouth unilaterally decides what information to share with ALECs, and what information to withhold. BellSouth unilaterally decides whether to put a release into production despite inadequate testing. And BellSouth unilaterally decides whether to comply with its own CCP. Such control is indicative of a monopolist and not a company that provides nondiscriminatory access to its OSS.

CONCLUSION

ALECs previously demonstrated, at the workshop and in their *Comments*, that BellSouth's OSS is riddled with major defects. ALECs also presented workable and constructive solutions to these defects. Yet, these defects persist, and BellSouth has given neither ALECs nor this Commission any reason to believe these defects have been remedied or will be remedied any time soon. If these defects are not remedied, ALECs will continue to be at a significant competitive disadvantage.

If, on the other hand, BellSouth works with this Commission and the ALECs to correct these defects, the adverse effect upon competition between ALECs and BellSouth may be lessened. For this to occur, BellSouth must implement corrective measures as detailed in the *ALEC Comments*. In addition, BellSouth must work to cooperate more fully with ALECs to reconcile BellSouth's data integrity issues, and AT&T has proposed a feasible means to accomplish such cooperation. Once these significant problems demonstrably are solved -- and not merely proposed to be solved -- this Commission may be assured that true competition, in the

spirit contemplated by the Act, is possible among competing LECs in Florida. At that time, this Commission may be in a position to recommend approval of BellSouth's 271 application.

Respectfully submitted this 25th day of July, 2002,

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EXHIBIT 1

Linear Trend of State Specific Percent Flow Through
November 2001 – April 2002

State	Residence	Business	UNE	LNP
Alabama	+	+	+	+
Florida	-	-	-	+
Georgia	-	+	+	-
Kentucky	flat	-	-	+
Louisiana	flat	-	+	+
Mississippi	-	-	+	-
North Carolina	+	+	+	+
South Carolina	flat	-	+	+
Tennessee	flat	+	+	-

This analysis demonstrates declining performance for all categories except LNP.

This analysis does not concern itself with the level of performance, only the trend in performance over time.

State Specific Flow Through Data
Source - Discovery Responses in TRA Docket NO. 01-00362 and Docket NO. 97-00309

Aggregate % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	89	89	89	90	90	90
FL	83	84	84	80	78	78
GA	86	89	89	90	89	90
KY	90	91	91	90	90	90
LA	91	88	92	92	92	92
MS	87	86	87	89	90	92
NC	82	84	83	82	83	86
SC	87	87	84	85	87	88
TN	88	89	89	89	89	90

Residence % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	92	92	92	92	93	94
FL	85	86	86	81	80	80
GA	91	90	88	91	90	89
KY	93	93	93	92	93	94
LA	94	94	93	94	94	94
MS	93	93	93	91	92	93
NC	86	87	86	84	86	89
SC	89	89	85	85	88	90
TN	92	92	92	93	94	96

Business % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	66	74	64	78	74	72
FL	75	75	75	72	69	68
GA	75	76	79	81	83	81
KY	80	78	74	80	79	77
LA	81	71	75	81	78	73
MS	73	60	63	70	69	65
NC	77	75	76	78	80	79
SC	69	71	74	74	71	65
TN	77	81	79	83	81	79

UNE % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	78	80	79	82	81	81
FL	76	80	79	76	76	75
GA	84	89	89	89	89	90
KY	84	86	87	86	83	84
LA	59	62	80	80	84	80
MS	54	52	83	87	89	91
NC	73	80	80	78	76	79
SC	73	80	81	83	82	82
TN	77	79	82	80	78	80

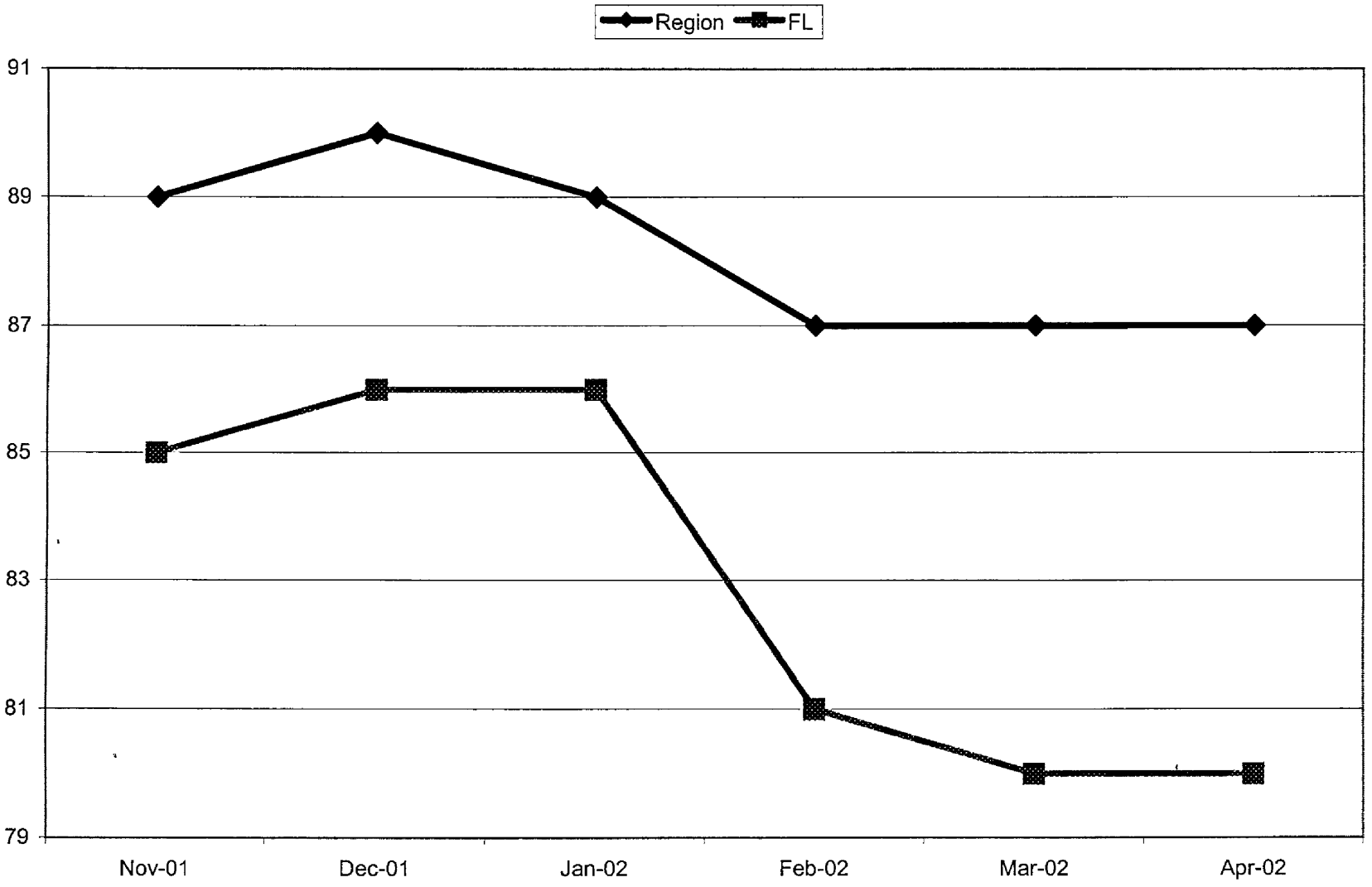
State Specific Flow Through Data
Source - Discovery Responses in TRA Docket NO. 01-00362 and Docket NO. 97-00309

LNP % Flow Through

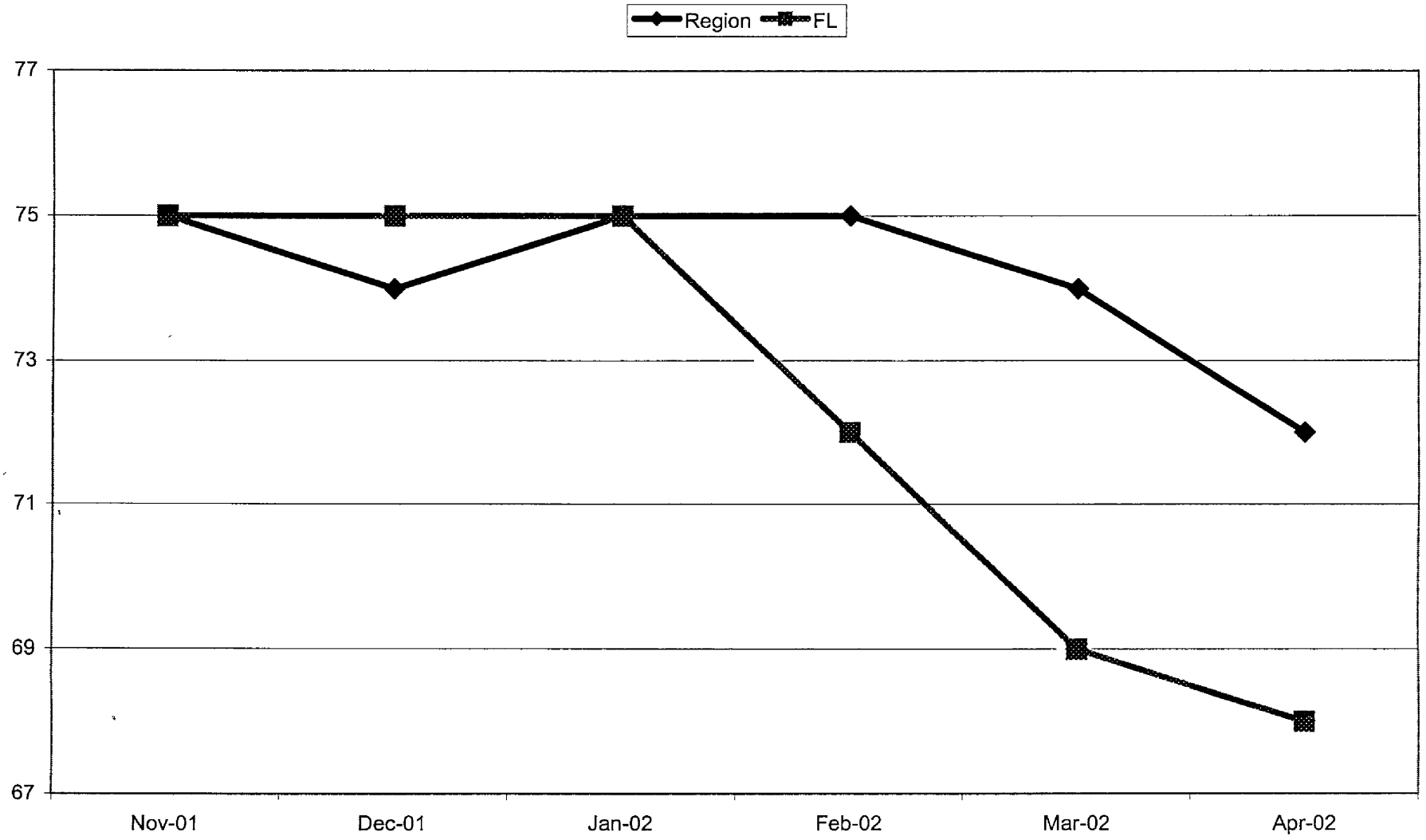
	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	87	80	68	86	78	88
FL	90	86	94	95	93	93
GA	96	94	97	97	93	96
KY	90	93	95	97	96	97
LA	81	83	77	81	85	86
MS					93	83
NC	81	70	69	72	82	81
SC	89	87	81	93	92	91
TN	85	83	81	82	79	84

EXHIBIT 2

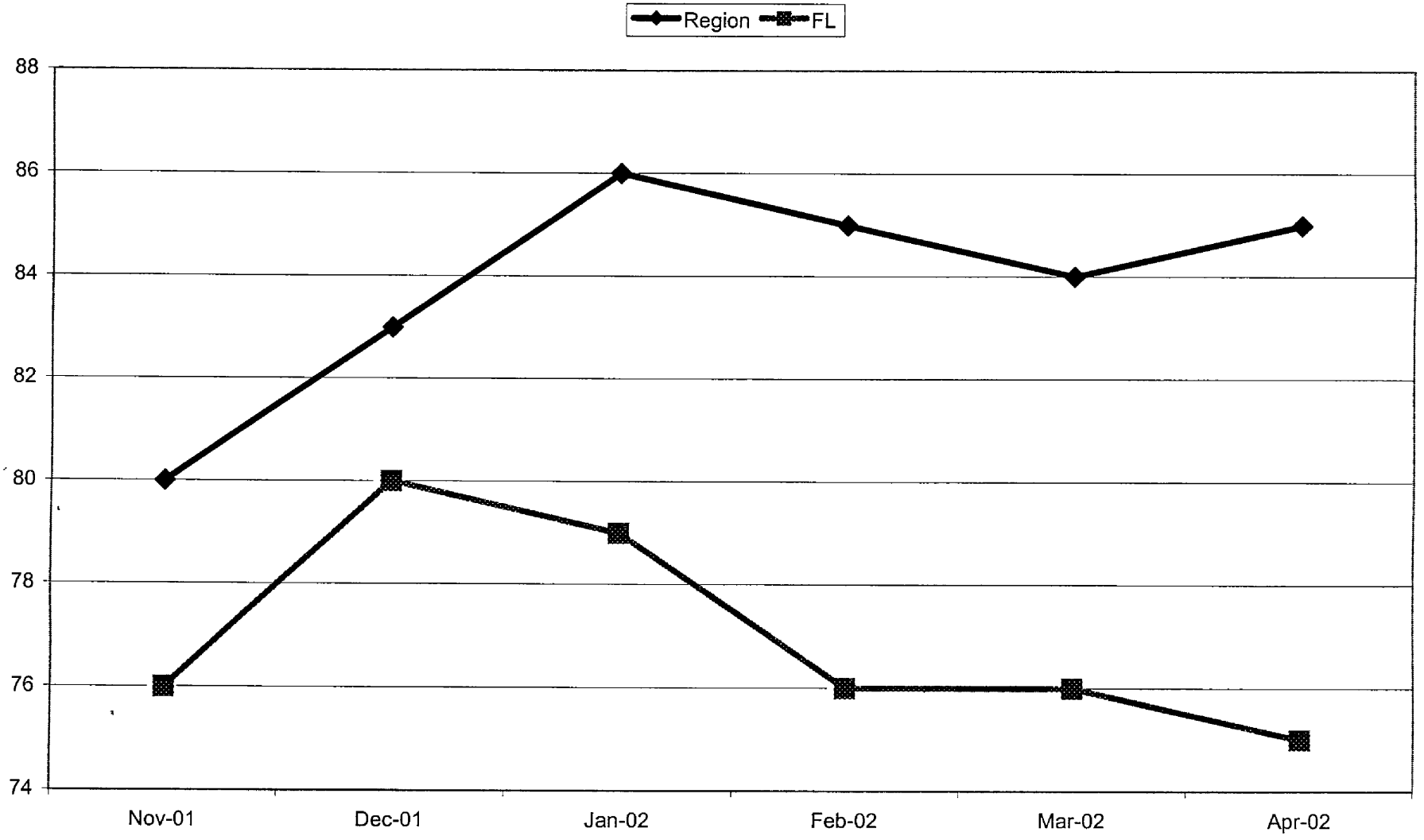
Residence % Flow Through - Florida Vs Region
Benchmark 95%



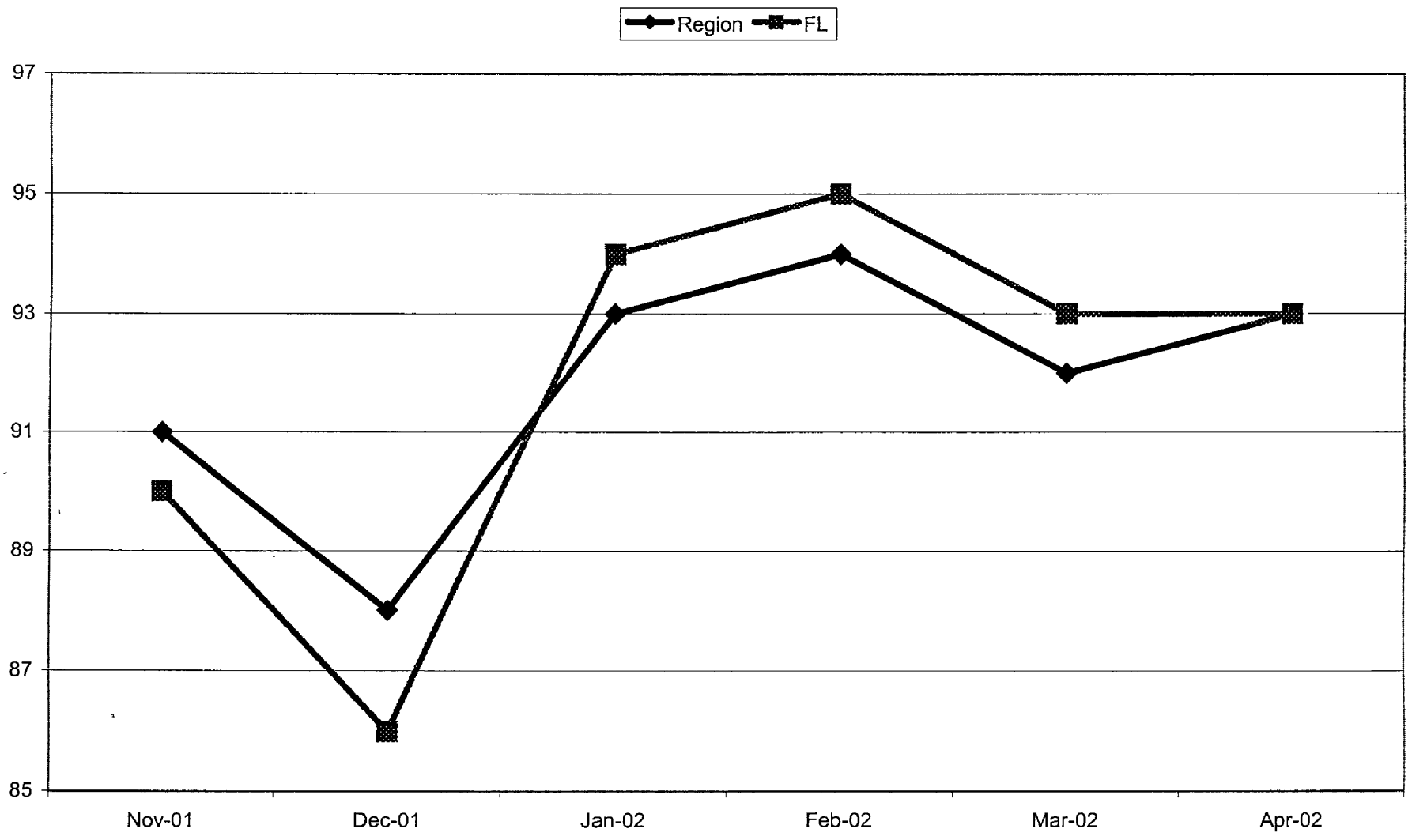
Business % Flow Through - Florida Vs Region
Benchmark 90%



UNE % Flow Through - Florida Vs Region
Benchmark 85%



LNP % Flow Through - Florida Vs Region
Benchmark 85%



State Specific Flow Through Data
Source - Discovery Responses in TRA Docket NO. 01-00362 and Docket NO. 97-00309

Aggregate % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	86	87	87	86	86	86
FL	83	84	84	80	78	78

Residence % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	89	90	89	87	87	87
FL	85	86	86	81	80	80

Business % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	75	74	75	75	74	72
FL	75	75	75	72	69	68

UNE % Flow Through

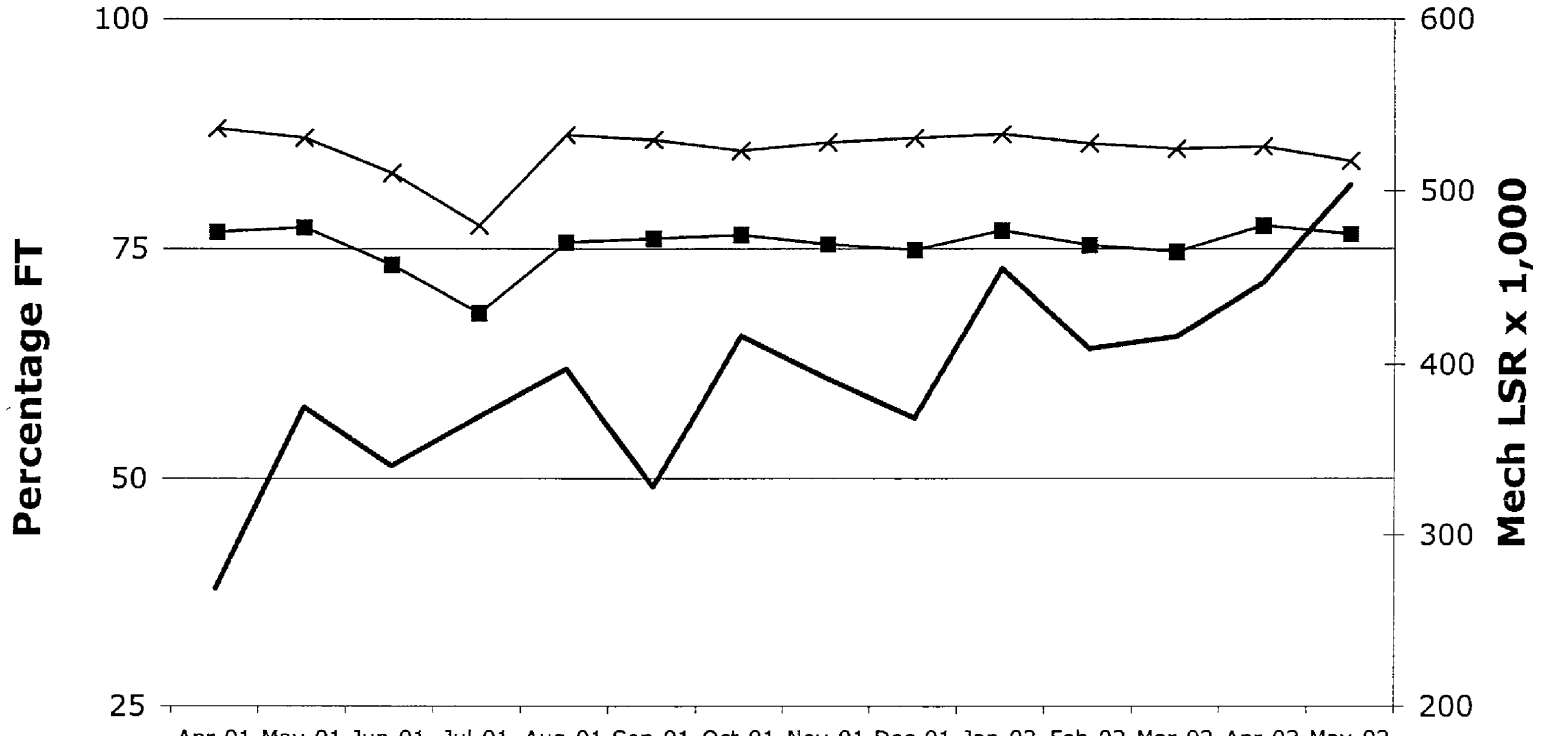
	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	80	83	86	85	84	85
FL	76	80	79	76	76	75

LNP % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	91	88	93	94	92	93
FL	90	86	94	95	93	93

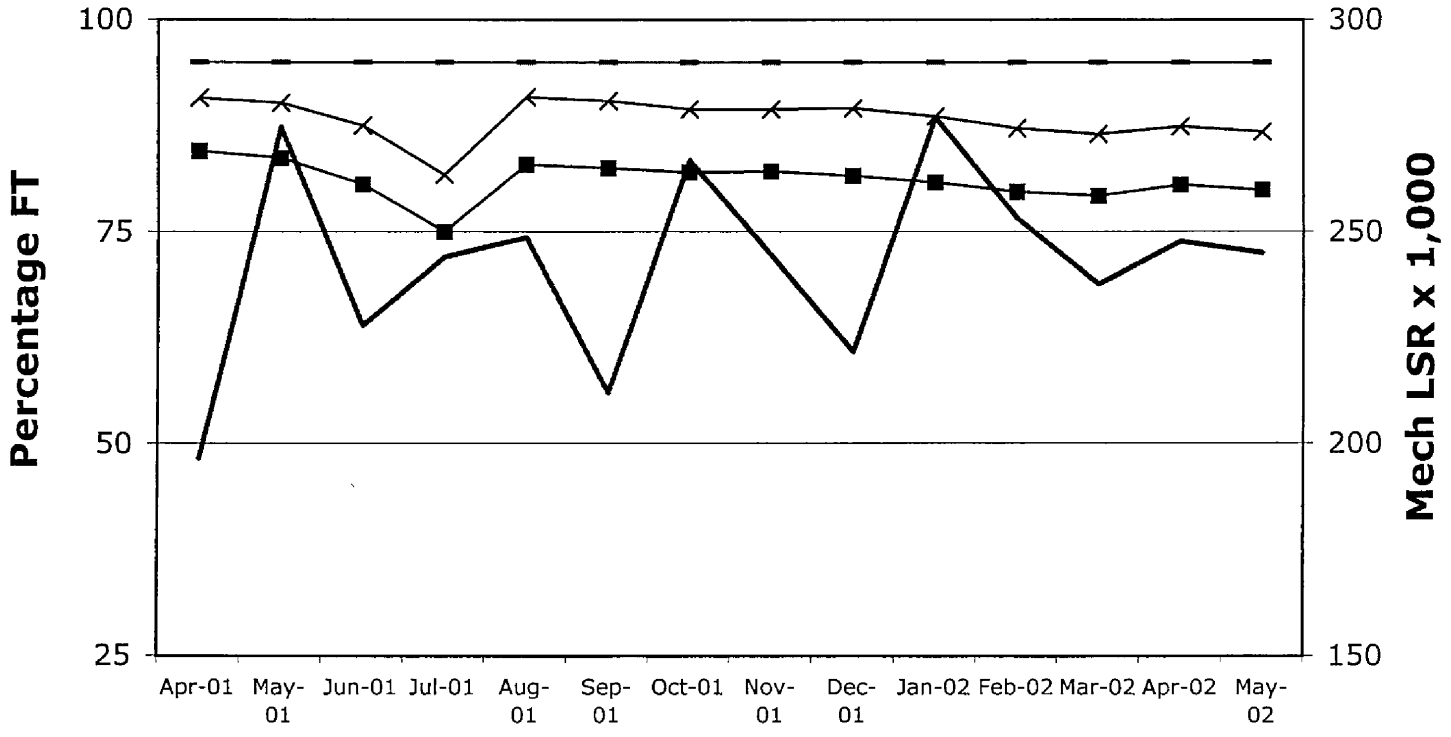
EXHIBIT 3

Flow Through - Aggregate



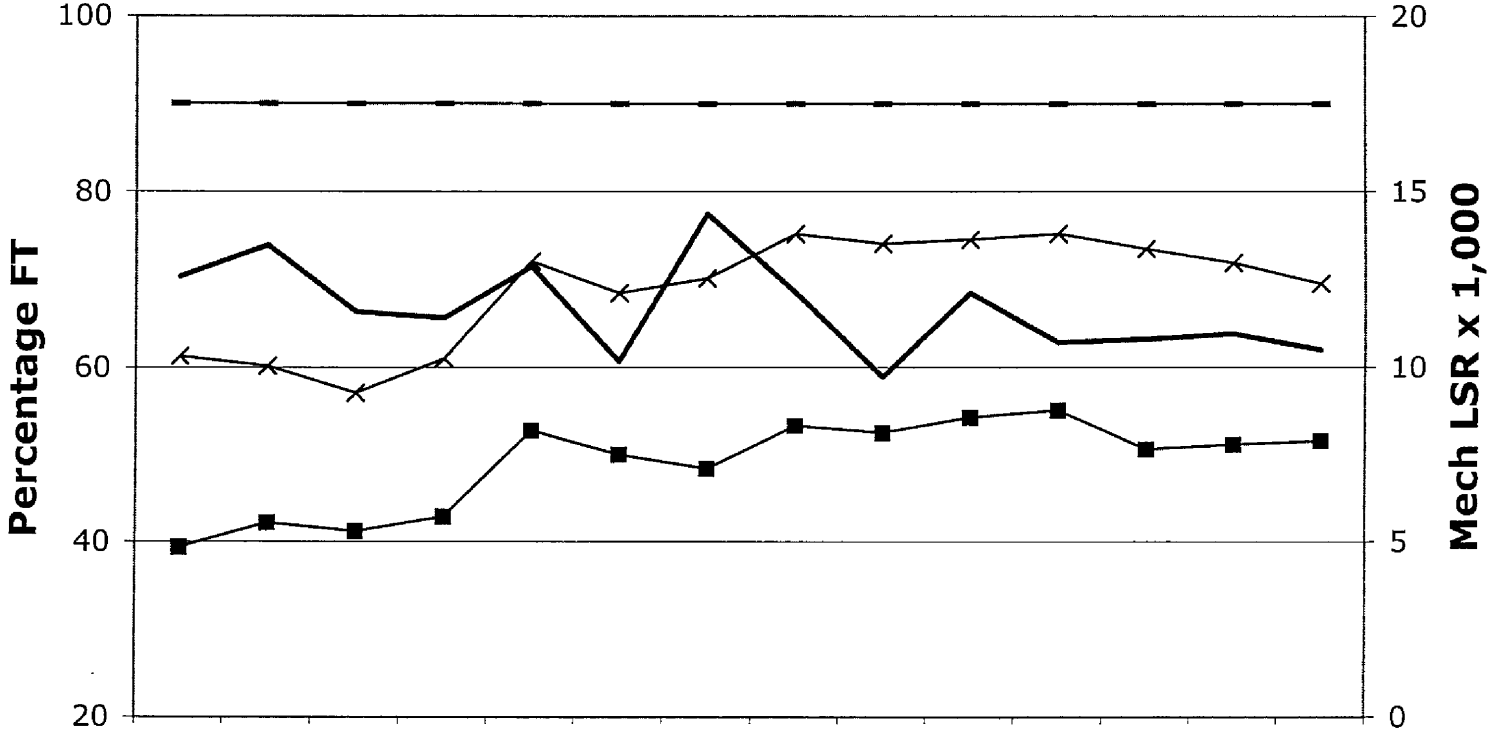
	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
%Flow Through	88.0	87.0	83.2	77.5	87.3	86.8	85.6	86.5	87.0	87.4	86.4	85.8	86.1	84.5
%Achieved Flow Through	76.8	77.3	73.3	68.1	75.7	76.1	76.5	75.5	74.9	77.0	75.4	74.7	77.5	76.6
Total Mech LSR's x 1,000	268.9	375.6	340.8	369.8	397.6	328.4	416.6	392.0	369.0	455.5	409.3	416.3	447.6	503.6

Flow Through - Residential



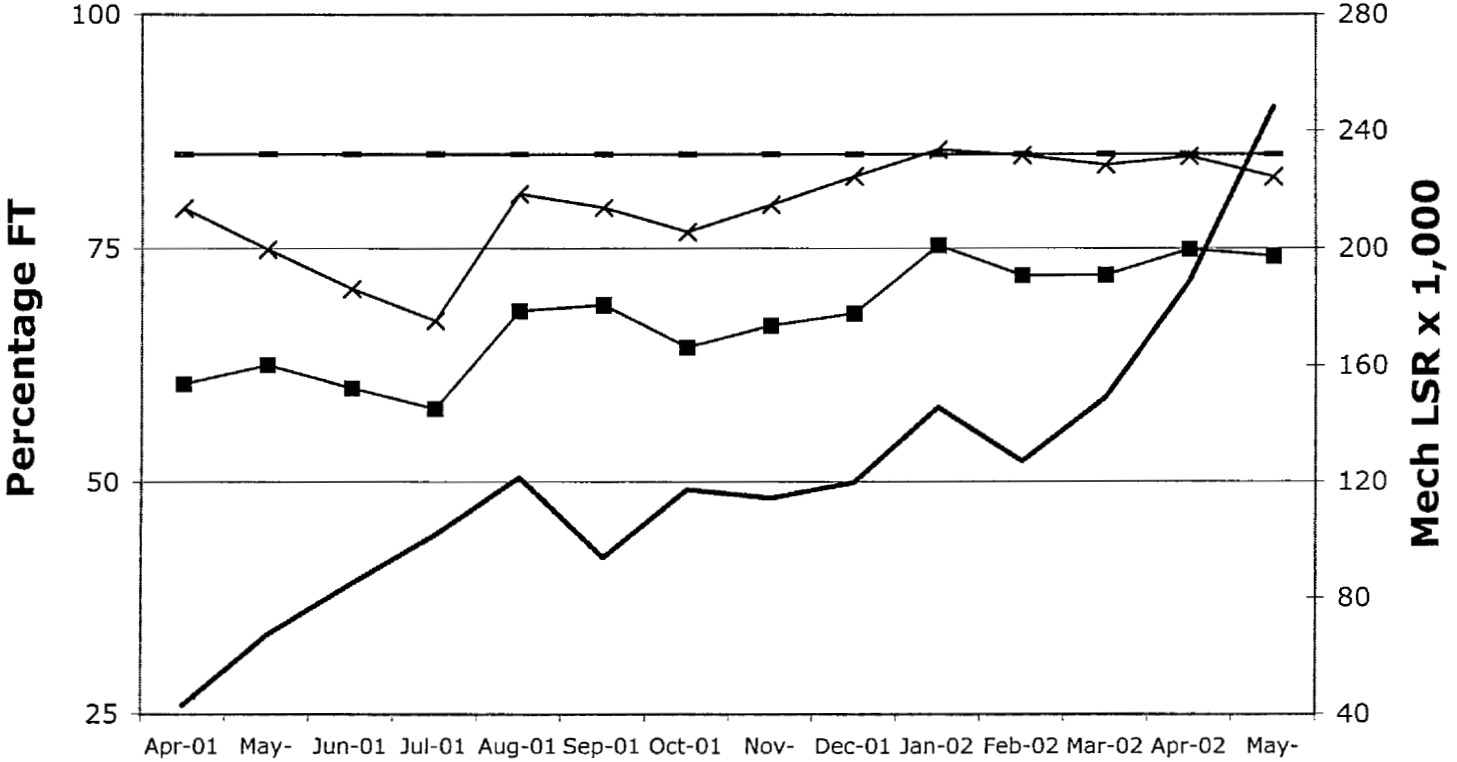
	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
%Benchmark	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0
%Flow Through	90.7	90.2	87.5	81.7	90.8	90.4	89.4	89.4	89.5	88.6	87.2	86.5	87.4	86.7
% Achieved Flow Through	84.5	83.7	80.6	75.0	82.9	82.5	82.0	82.1	81.6	80.8	79.7	79.2	80.5	79.9
Total Mech LSR's x 1,000	196.5	274.6	228.0	244.1	248.6	212.1	266.8	244.5	221.7	276.9	253.1	237.7	247.7	245

Flow Through - Business



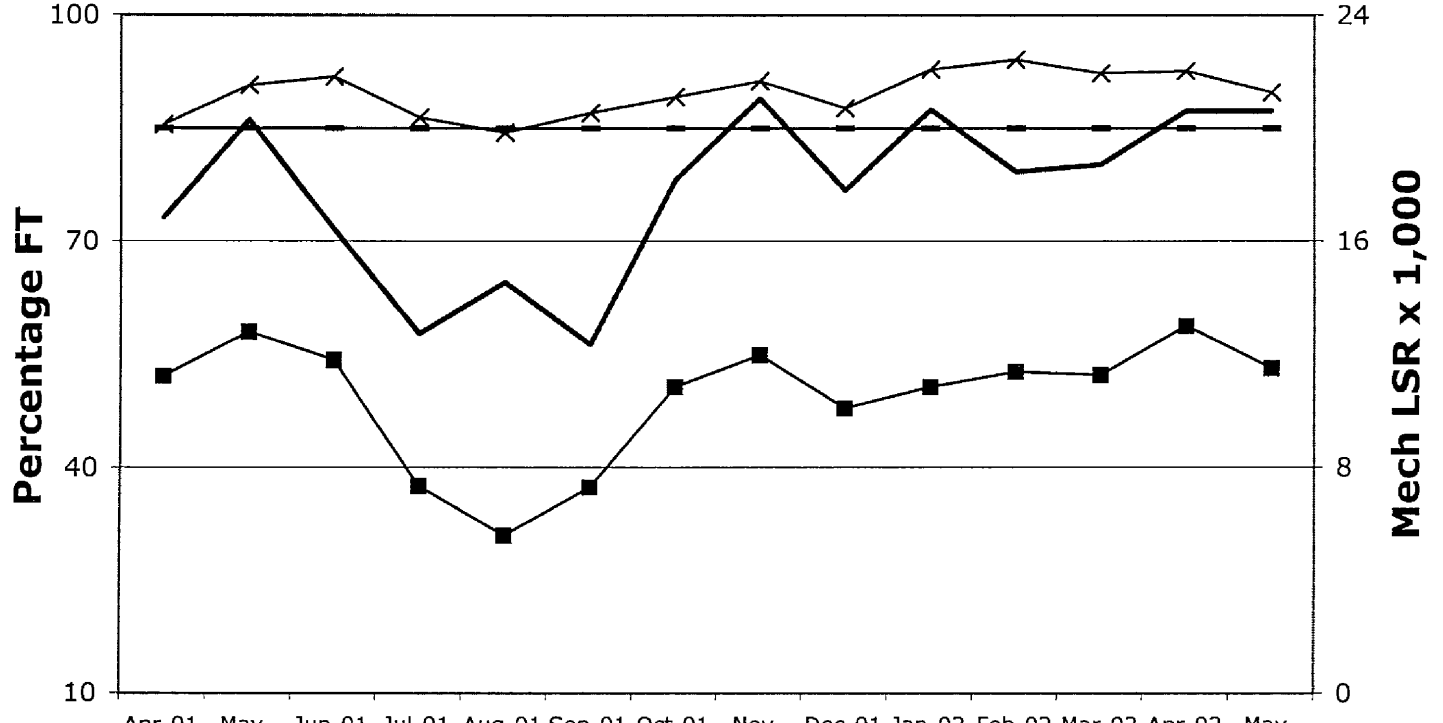
	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
%Benchmark	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0
%Flow Through	61.3	60.1	57.1	61.0	72.1	68.5	70.2	75.2	74.1	74.6	75.2	73.5	71.9	69.5
% Achieved Flow Through	39.4	42.2	41.2	42.9	52.8	50.0	48.4	53.3	52.5	54.3	55.1	50.6	51.2	51.6
Total Mech LSR's x 1,000	12.6	13.5	11.6	11.4	12.9	10.2	14.4	12.1	9.7	12.1	10.7	10.8	10.9	10.5

Flow Through - UNE



	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
%Benchmark	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0
%Flow Through	79.3	74.9	70.7	67.3	80.82	79.3	76.7	79.7	82.7	85.5	84.9	83.9	84.8	82.6
% Achieved Flow Through	60.6	62.6	60.1	57.9	68.4	69.0	64.5	66.8	68.1	75.3	72.1	72.2	74.9	74.1
Total Mech LSR's x 1,000	42.9	67.2	84.7	101.6	121.6	93.7	117.3	114.3	119.8	145.8	127.0	149.1	189.0	248.1

Flow Through - LNP



	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
%Benchmark	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0
%Flow Through	85.5	90.7	91.8	86.4	84.4	87.0	89.1	91.2	87.6	92.8	94.1	92.3	92.6	89.8
% Achieved Flow Through	52.2	58.0	54.3	37.5	30.9	37.3	50.7	54.9	47.9	50.7	52.7	52.3	58.8	53.2
Total Mech LSR's	16.8	20.3	16.4	12.7	14.6	12.4	18.2	21.0	17.8	20.6	18.4	18.7	20.6	20.6

Aggregate	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's x 1,000	268 9	375.6	340 8	369 8	397.6	328 4	416.6	392 0	369 0	455.5	409 3	416 3	447 6	503.6
% Achieved Flow Through	76 8	77.3	73 3	68 1	75.7	76.1	76.5	75 5	74.9	77 0	75.4	74.7	77.5	76 6
%Flow Through	88.0	87.0	83.2	77.5	87.3	86 8	85.6	86.5	87 0	87.4	86 4	85 8	86.1	84 5

Residential	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's	196,503.0	274,630.0	228,019 0	244,057.0	248,610.0	212,130 0	266,809 0	244,533 0	221,718 0	276,926.0	253,123.0	237,652.0	247,694.0	245,039.0
Total Mech LSR's x 1,000	196 5	274.6	228 0	244 1	248.6	212.1	266.8	244 5	221.7	276.9	253.1	237 7	247.7	245
% Achieved Flow Through	84 5	83 7	80.6	75.0	82 9	82.5	82 0	82.1	81.6	80.8	79.7	79.2	80 5	79.9
%Flow Through	90 7	90 2	87.5	81.7	90 8	90 4	89.4	89.4	89.5	88.6	87 2	86 5	87.4	86.7
%Benchmark	95 0	95 0	95.0	95.0	95.0	95 0	95 0	95 0	95.0	95.0	95.0	95.0	95 0	95 0

Business	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's	12594.0	13481.0	11590.0	11411 0	12879.0	10172.0	14367.0	12134.0	9724.0	12122.0	10709.0	10,800 0	10,948.0	10,474 0
Total Mech LSR's x 1,000	12 6	13.5	11.6	11 4	12.9	10.2	14 4	12 1	9 7	12 1	10.7	10.8	10.9	10.5
% Achieved Flow Through	39.4	42.2	41 2	42 9	52.8	50.0	48.4	53.3	52.5	54.3	55.1	50.6	51.2	51.6
%Flow Through	61 3	60.1	57 1	61 0	72 1	68.5	70.2	75.2	74.1	74.6	75.2	73.5	71.9	69.5
%Benchmark	90 0	90 0	90 0	90.0	90.0	90.0	90.0	90.0	90 0	90.0	90.0	90.0	90 0	90.0

LNP	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's	16844.0	20285 0	16411 0	12731 0	14557.0	12350.0	18169 0	21034 0	17807.0	20639.0	18446.0	18,705.0	20,563 0	20604.0
Total Mech LSR's x 1,000	16.8	20.3	16.4	12.7	14 6	12 4	18 2	21.0	17 8	20 6	18.4	18.7	20.6	20 6
% Achieved Flow Through	52 2	58 0	54.3	37.5	30 9	37 3	50.7	54.9	47.9	50.7	52.7	52 3	58.8	53.2
%Flow Through	85 5	90 7	91 8	86 4	84 4	87 0	89 1	91 2	87 6	92.8	94.1	92 3	92 6	89.8
%Benchmark	85 0	85 0	85 0	85 0	85.0	85.0	85.0	85.0	85.0	85 0	85 0	85 0	85 0	85 0

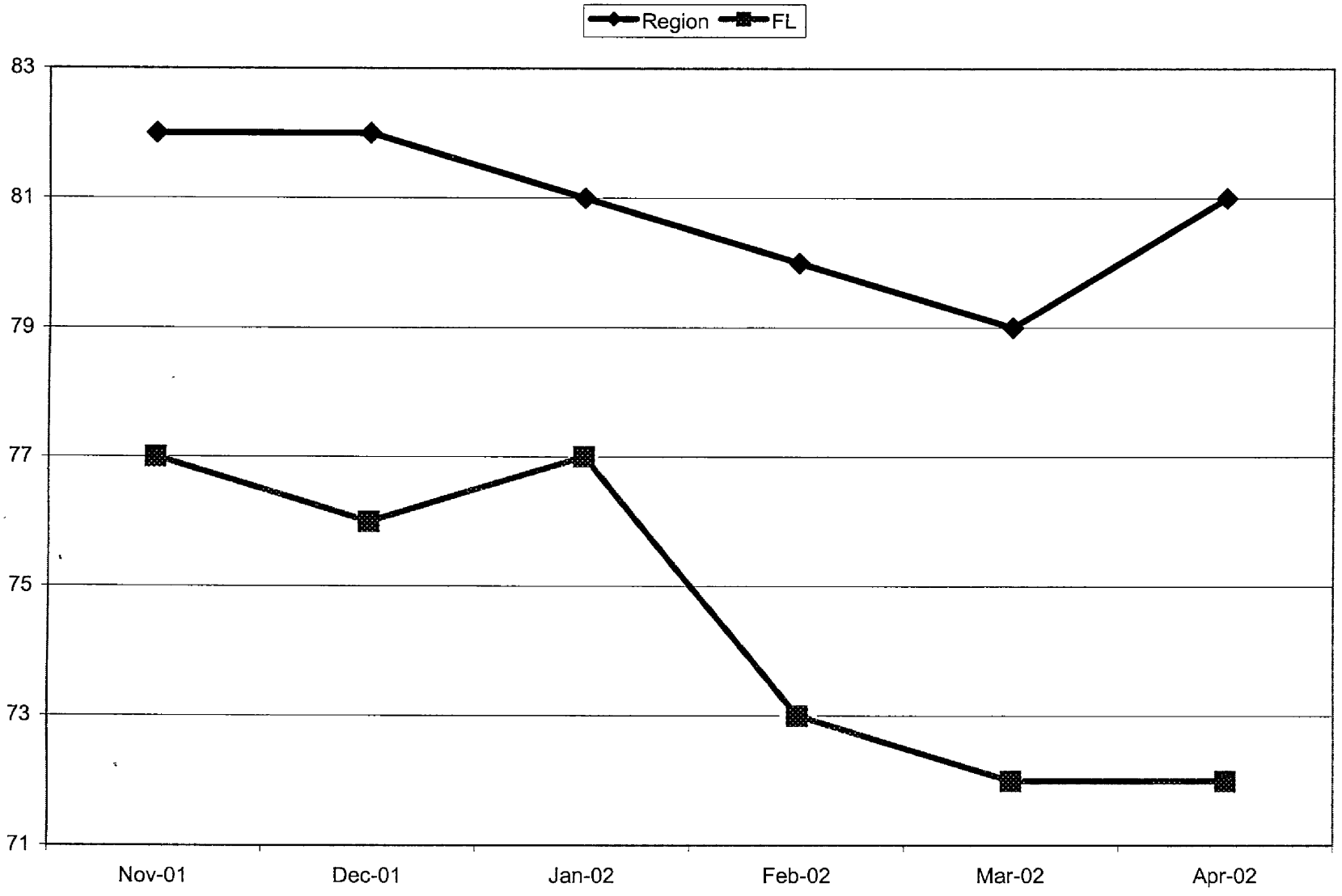
UNE	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's	42919 0	67181 0	84738 0	101599 0	121594 0	93716 0	117270 0	114297 0	119789 0	145792 0	127006.0	149,121.0	189,007 0	248,097 0
Total Mech LSR's x 1,000	42 9	67.2	84.7	101.6	121.6	93.7	117.3	114 3	119 8	145 8	127.0	149 1	189.0	248 1
% Achieved Flow Through	60.6	62.6	60.1	57 9	68 4	69.0	64.5	66 8	68.1	75 3	72 1	72 2	74 9	74.1
%Flow Through	79 3	74 9	70 7	67.3	80.82	79 3	76.7	79.7	82 7	85.5	84 9	83.9	84.8	82.6
%Benchmark	85.0	85.0	85 0	85 0	85.0	85 0	85 0	85 0	85 0	85.0	85 0	85 0	85.0	85 0

UNE-P	Dec-01	Jan-02	Feb-02	Mar-02
Total Mech LSR	111,919	135,025	114,977	133,177
% Achieved Flow Through	68.6	76.6	73.5	74 2
%Flow Through	83 2	86 4	85.8	85.1

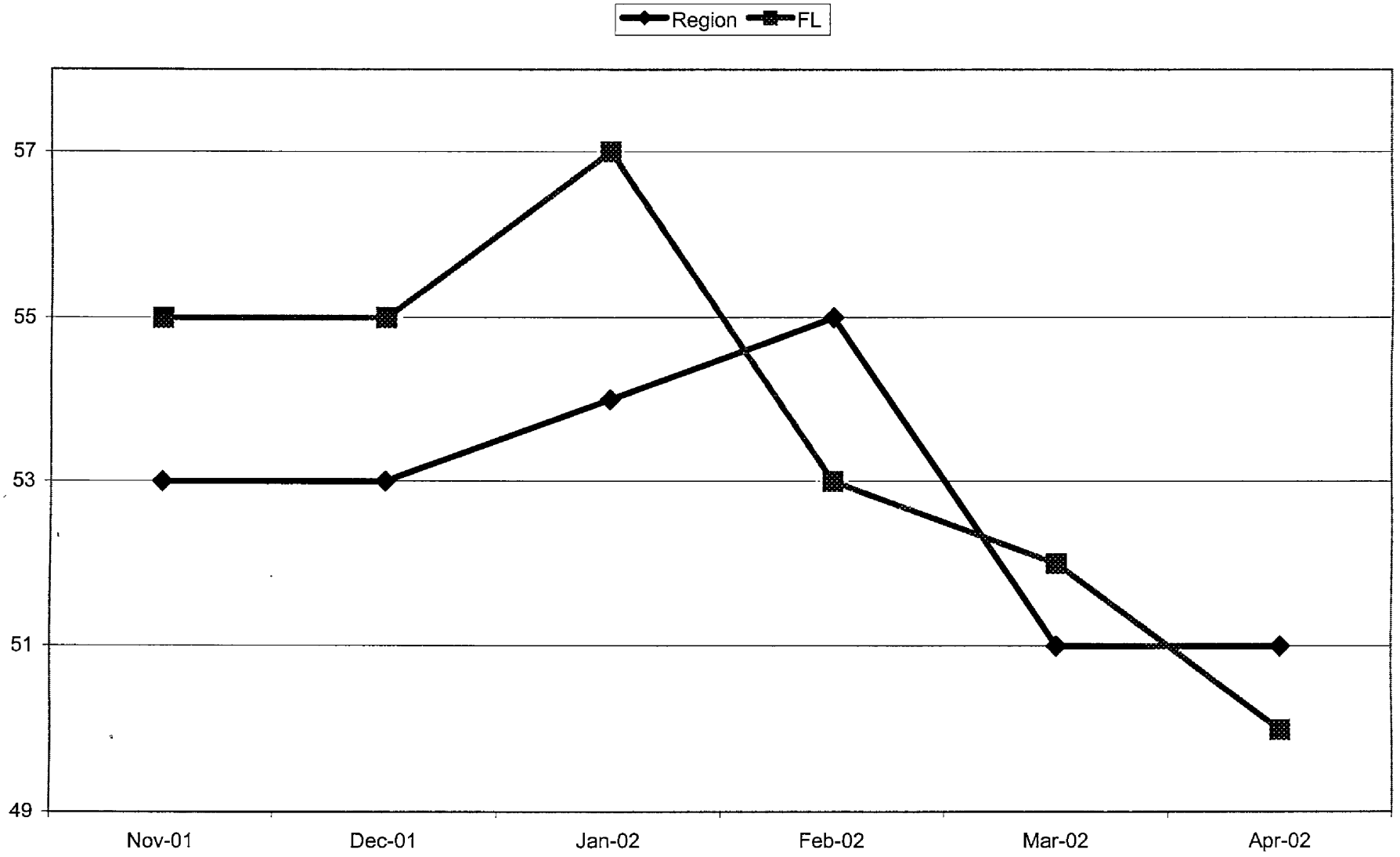
UNE Loops	Dec-01	Jan-02	Feb-02	Mar-02
Total Mech LSR	7,865	10,764	12,024	15,711
% Achieved Flow Through	60 3	57 8	57.9	53.8
%Flow Through	74.1	72 2	73.8	71 7

EXHIBIT 4

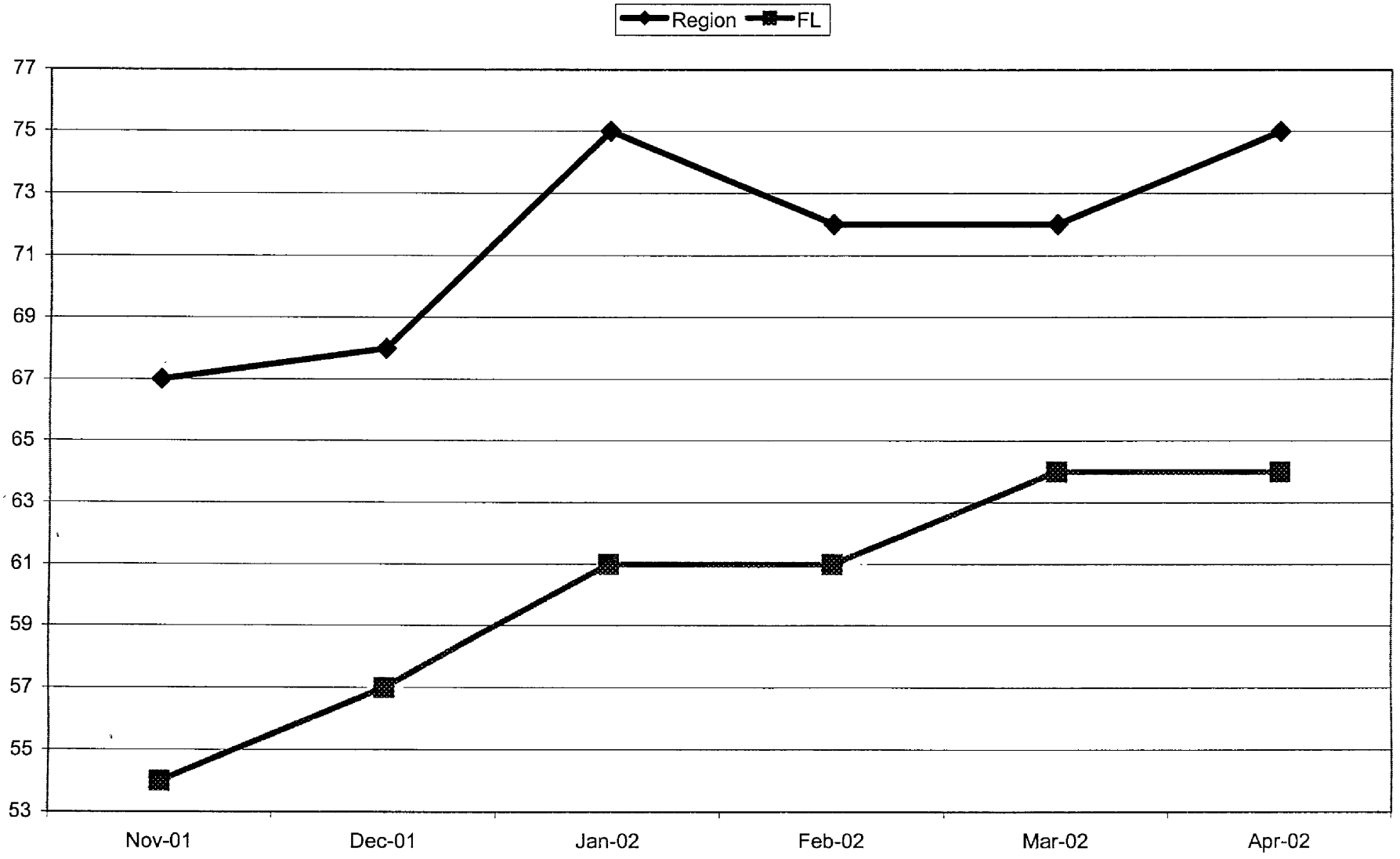
Residence % Achieved Flow Through - Florida Vs Region



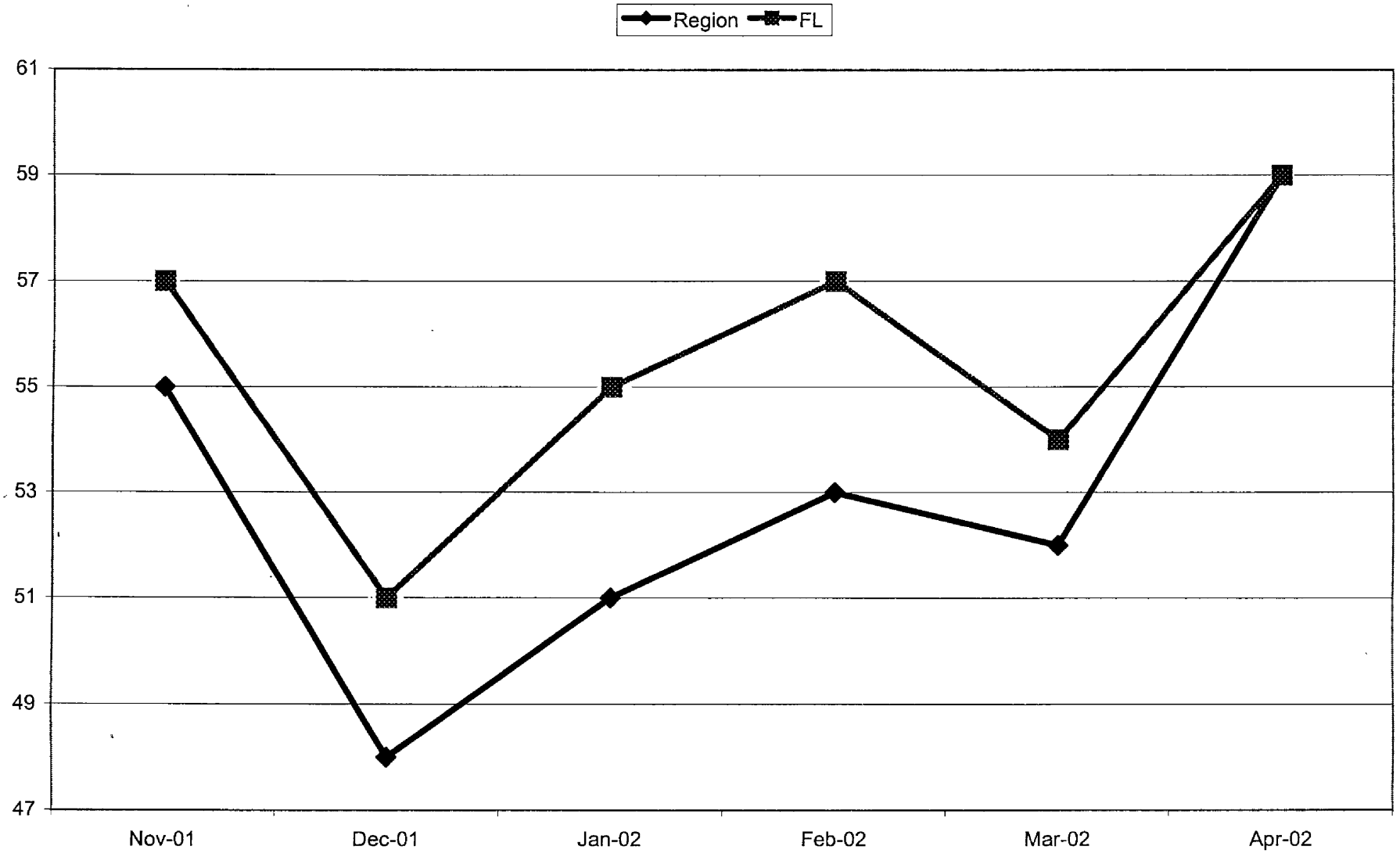
Business % Achieved Flow Through - Florida Vs Region



UNE % Achieved Flow Through - Florida Vs Region



LNP % Achieved Flow Through - Florida Vs Region



State Specific Achieved Flow Through Data
Source - Discovery Responses in TRA Docket NO. 01-00362 and Docket NO. 97-00309

Aggregate % Achieved Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	76	75	77	75	75	78
FL	72	71	74	70	69	69

Residence % Achieved Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	82	82	81	80	79	81
FL	77	76	77	73	72	72

Business % Achieved Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	53	53	54	55	51	51
FL	55	55	57	53	52	50

UNE % Achieved Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	67	68	75	72	72	75
FL	54	57	61	61	64	64

LNP % Achieved Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
Region	55	48	51	53	52	59
FL	57	51	55	57	54	59

EXHIBIT 5

Individual Flow Through Task Force Item Status Since Initiation of the Task Force in February 2001

FTTF #	CCP CR #	Status
FTTF-01	CR-0557	Implemented in R10.3.1 and R10.5
FTTF-02	CR-0241 CR-0003	Targeted for LSOG6 release in December 2003
FTTF-03	CR-0335	Priority Rank 7 – Not Scheduled
FTTF-04	CR-0724	Implemented in R10.5
FTTF-05	CR-0725	Priority Rank 2 – Scheduled for R10.6 (August)
FTTF-06	CR-0726	Priority Rank 9 – Not Scheduled
FTTF-07	CR-0727	Targeted for LSOG6 release in December 2003
FTTF-08	CR-0728	Priority Rank 4 – Not Scheduled
FTTF-09	CR-0731	Cancelled, combined with CR-0688 and Targeted for LSOG6 release in December 2003
FTTF-10	CR-0563	Priority Rank 5 – Not Scheduled
FTTF-11	CR-0541	Priority Rank 6 – Scheduled for R10.6 and R11.0
FTTF-12		Being analyzed – Priority Rank 3 – Not Scheduled
FTTF-13	CR-0029	Scheduled for R10.6 (August 2002)
FTTF-14	CR-0441	Implemented in R10.3
FTTF-15	CR-0078	Implemented in R10.5
FTTF-16	CR-0729	Priority Rank 15 – Not Scheduled
FTTF-17	CR-0137	Implemented in R10.5
FTTF-18	CR-0160	Scheduled for R10.6 (August 2002)
FTTF-19	CR-0088 CR-0357	Priority Rank 16 – Not Scheduled
FTTF-20	CR-0273	Priority Rank 13 – Not Scheduled
FTTF-21	CR-0505	Pending – Not Scheduled
FTTF-22	CR-0506	Priority Rank 18 – Not Scheduled
FTTF-23	CR-0518	Priority Rank 8 – Not Scheduled
FTTF-24	CR-0494	Implemented in R10.5
FTTF-25	CR-0492	Scheduled for R11.0 (December 2002)
FTTF-26	CR-0365	Implemented in R10.5
FTTF-27	CR-0493	Cancelled
FTTF-28	CR-0496	Priority Rank 11 – Not Scheduled
FTTF-29	CR-0490	Implemented in R10.2
FTTF-30	CR-0491	Implemented in R9.2.1
FTTF-31	CR-0495	Priority Rank 9 – Not Scheduled
FTTF-32	CR-0228	Scheduled for R11.0 (December 2002)
FTTF-33	CR-0622	Priority Rank 12 – Not Scheduled
FTTF-34	CR-0625	Priority Rank 1 – Not Scheduled
FTTF-35	CR-0674	Priority Rank 17 – Not Scheduled
FTTF-36	CR-0621	Priority Rank 14 – Determined to be a Defect - Not Scheduled

EXHIBIT 6

Denise C. Berger
District Manager
Local Supplier Management

1200 Peachtree Street, NE
Promenade I, 12th Floor
Atlanta, GA 30309
404 810-8644
FAX 404 810-8477
PAGER 800 258-0000 PIN 268958
EMAIL deberger@att.com

July 15, 2002

VIA FACSIMILE AND MAIL

Rebecca N. Hazelwood
Director
BellSouth Telecommunications, Inc.
Interconnection Service Operations
675 West Peachtree Street, N.E.
Suite 3F42
Atlanta, Georgia 30375

RE: Letters Dated July 1, 2002, and July 8, 2002

Dear Becky:

This is in response to BellSouth's July 1, 2002, and July 8, 2002, letters concerning BellSouth's responsiveness to AT&T's Performance Measures questions. I am encouraged that subject-matter experts from both of our teams will meet on July 23, 2002, to discuss specific performance measures issues and engage in meaningful and constructive analysis of performance data.

In the July 1, 2002, letter BellSouth indicates that it has "spent countless time, energy, and money in developing the resources necessary for CLECs, including AT&T, to perform meaningful analysis of performance data for themselves." I wonder if this statement implies BellSouth's belief that AT&T fails to use the resources that BellSouth has made available for CLECs? AT&T has used every tool available and has provided to BellSouth the specific raw data used and the detailed results of its analysis with every request. AT&T provides as much information as possible in order to illustrate the steps taken to find the answers without assistance from BellSouth. If the answers had been apparent using the resources available, AT&T would not have been compelled to ask BellSouth for clarification and further information.

In that same letter you also state that BellSouth has been willing "for some time to engage in data reconciliation." Interestingly, these offers came not from the Performance Team under your direction, but came from Bennett Ross in the BellSouth legal department. However, those offers were specific to items discussed at the Georgia Performance Measurements Workshop, held in conjunction with Georgia Docket No. 7892-U and were seeking answers to a different set of questions, which, incidentally, were answered to AT&T's satisfaction through that exchange of letters.

Overall, however, AT&T has not been successful in either getting answers to questions or in gaining agreement from BellSouth to meet regarding specific performance issues. As background, BellSouth changed the CLEC Account Team structure and began addressing CLEC issues through the CLEC Care organization. AT&T's CLEC Care representatives indicated at the beginning of this year that issues, questions and areas of improvement for all performance measures should be directed to Phil Porter. AT&T has directed questions and requests for information and meetings to Phil Porter since January of this year, with follow up requests to the CLEC Care team, as we were directed to do. We have received no substantive answers to our questions and have been rebuked at each request for a meeting to discuss the issues and reconcile any associated data. BellSouth has been unwilling to resolve the data integrity questions that AT&T has raised in a business-to-business setting.

While BellSouth has finally agreed to provide some information to AT&T at a meeting on July 23, 2002, the adequacy of the information is unclear at this time. In addition to the topics outlined in your July 1, 2002, letter, AT&T requests that BellSouth be prepared to clarify it's position on the issue of data reconciliation, including a description of the types of analysis BellSouth will conduct and the associated outputs of such analysis. Additionally, BellSouth should clarify to whom AT&T should direct requests, as well as identify the individuals who are responsible for approving the responses to such requests and the timeframe for resolution of an issue after it has been identified.

The following list will detail the expected information for each discussion topic outlined in your letter of July 1, 2002.

1) <u>UNE Other Design Total Mechanized Flow Through Counts Don't Match Reject Service Request Total Mechanized Counts.</u>
    a. AT&T seeks a comparison of the Percent Reject Service Request Report and the Flow-Through Report. Directory Listing orders are included in the UNE Other Non-Design Ordering Category. BellSouth's letter of April 22, 2002, led to the confusion regarding these reports.
2) <u>Fully Mechanized LNP Flow Through LSR Rejects Don't Match LNP Reject Interval Service Requests.</u>
    a. AT&T is seeking PON-specific data, as well as the information for OCN 7562.
3) <u>Explain Classification of Fully and Partially Mechanized Auto Clarifications.</u>
    a. AT&T seeks specific information on what types of orders sent under what types of conditions are classified as "fully" and "partially" mechanized.
4) <u>Does the LNP Aggregate Flow Through Report Only Count LNP Standalone LSRs?</u>
    a. AT&T is aware that this can count other categories, but for AT&T-specific data, there will only be LNP standalone orders in this report. AT&T requires PON level detail to determine why the gap exists.

<u>What Accounts for the Differences Between LNP Flow Through and LNP Total Mechanized Reject Report?</u>

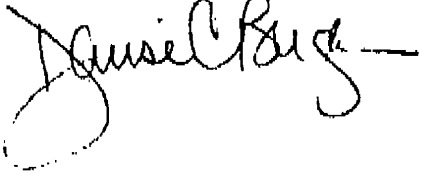
    a. AT&T requires PON level detail to determine why the gap exists.

b. AT&T provided January 2002 data in addition to the December 2001 data. AT&T also requires analysis for January.
c. AT&T also requires information for OCN 7562.

5) ACNI and OCI Raw Data Files Do Not Match for March 2002 Data.
   a. Ted McDonald called KC Timmons at AT&T on July 11, 2002, and explained that the OCI raw data was not complete. Is this a one-time problem or recurring? AT&T seeks to understand why this occurred.
6) Compare the March LNP LSR Flow Through Report With LNP FOC Timeliness and Reject Report and Explain the Differences.
   a. This is a comparison of raw data files in March.
   b. AT&T provided PON specific data. AT&T expects PON specific reconciliation from BellSouth.

Please let me know prior to our meeting on July 23, 2002, whether further clarification is needed by BellSouth.

Sincerely,



cc: Greg Terry
KC Timmons
J. Schenk
B. Ross

EXHIBIT 7

Change Control Process Back Log

Overall Defect Change Request Back Log
6/11/02[1]

Change Request Status	Number of Change Requests in Back Log	Submission Date of "Oldest" Request in Back Log
New	0 (5)	11/27/01
Pending Clarification	0 (6)	12/28/01
Validated	21	9/1/00
Scheduled	11	9/10/01
Total	32	

New – Indicates a Defect Change Request has been received by the BellSouth Change Control Manager ("BCCM") and the change request form validated for completeness.

Pending Clarification – BellSouth has asked the originator of the change request for additional input regarding the request.

Validated – Indicates internal analysis has been conducted and it is determined that it is a validated defect.

Scheduled – Indicates a Defect Change Request has been scheduled for a release.

[1] All information summarized here was obtained from the BellSouth Change Control Log provided to the CLECs by e-mail on May 29, 2002 and the June 11, 2002 BellSouth Daily Change Request Activity Report. All documentation defects and defect change requests in "new" status because of CLEC inactivity have been excluded from this analysis.

Change Control Process Back Log

New Defect Status Back Log Detail

New – Indicates a Defect Change Request has been received by the BellSouth Change Control Manager ("BCCM") and the change request form validated for completeness.

Change Request #		Submission Date
588*		11/27/01
656*		2/12/02
708*		3/18/02
712**		3/22/02
771*		5/10/02
Total = 0		

* Each of these CRs carries the following note in the log "Determined to not be a defect. Waiting on originator to authorize closure." They have not been counted as back log.

** This CR carries the following note in the log "Determined to not be a defect. This request would constitute a feature, however, it is being addressed in the TAG transformation effort." It has not been counted as back log.

Change Control Process Back Log

Pending Clarification Defect Status Back Log Detail

Pending Clarification – BellSouth has asked the originator of the change request for additional input regarding the request. CRs in this status are not counted as back log.

Change Request #		Submission Date
581		12/28/01
584		1/4/02
641		2/1/02
735		4/8/02
751		4/16/02
792		5/21/02
Total = 0		

Change Control Process Back Log

Validated Defect Status Back Log Detail

Validated – Indicates internal analysis has been conducted and it is determined that it is a validated defect.

Change Request #		Submission Date
151		9/1/00
222		11/13/00
277		1/18/01
351		3/29/01
531		10/25/01
555		11/15/01
621		1/17/02
743		4/12/02
757		4/26/02
758		4/29/02
779		5/13/02
780		5/16/02
795		5/28/02
801		5/31/02
810		6/5/02
811		6/5/02
812		6/6/02
813		6/6/02
820		6/10/00
823		6/11/02
824		6/11/02
Total = 21		

Change Control Process Back Log

Scheduled Defect Status Back Log Detail

Scheduled – Indicates a Defect Change Request has been scheduled for a release.

Change Request #	Submission Date	Status Date	Target Date	Interval (Days)
339	3/14/01	9/10/01	8/24/02	412
682	3/6/02	4/3/02	8/24/02	165
693	3/12/02	5/6/02	8/24/02	159
704	3/15/02	3/15/02	8/24/02	156
730	4/3/02	4/26/02	8/24/02	136
743	4/11/02	4/26/02	8/24/02	128
753	4/23/02	4/23/02	8/24/02	116
766	5/3/02	5/3/02	8/24/02	106
769	5/7/02	5/7/02	8/24/02	102
788	5/20/02	5/20/02	12/7/02	200
800	5/31/02	5/31/02	8/24/02	78
Total = 11				

EXHIBIT 8

Change Control Process Back Log

Overall Feature Change Request Back Log
6/11/02[1]

Change Request Status	Number of Change Requests in Back Log	Submission Date of "Oldest" Request in Back Log
New	5	12/00
Pending	5	4/00
Candidate Request	42	8/99
Scheduled	13	8/99
Total	65	

New – Indicates a Change Request has been received by the BellSouth Change Control Manager ("BCCM") but has not been validated. The interval for validation is 10 business days.

Pending – Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review and prioritization. Change Review occurs at each monthly status meeting, prioritization occurs in March, June, August and December.

Candidate Request – Indicates a Change Request has completed the Change Review and prioritization process and is ready to be scheduled to a release.

Scheduled – Indicates a Change Request has been scheduled for a release.

[1] All information summarized here was obtained from the BellSouth Change Control Log provided to the CLECs by e-mail on May 29, 2002, the Change Request Status Report of June 11, 2002, and reflects the implementation of Release 10.5 on June 1-2, 2002.

Change Control Process Back Log

New Status Back Log Detail

New – Indicates a Change Request has been received by the BellSouth Change Control Manager ("BCCM") but has not been validated. The interval for validation is 10 business days.

Change Request #	Type	Submission Date
245	5	12/15/00
789	5	5/17/02
790	5	5/16/02
793	5	5/23/02
794	5	5/23/02
TOTAL = 5	Type 5 = 5 Type 4 = 0	

Type 4 = BellSouth Initiated
Type 5 = CLEC Initiated
Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

8 New Status Change Requests listed in the Change Request Log were excluded from this analysis because they were either still "new" because of CLEC inactivity or were requesting changes to the CCP.

Change Control Process Back Log

Pending Status Back Log Detail

Pending -- Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review and prioritization. Per the CCP Change Review occurs at each monthly status meeting, prioritization occurs in March, June, August and December. The most recent prioritization occurred on May 22, 2002.

Change Request #	Type	Submission Date	Status Date
12	5/2	4/00	4/02
404	5	5/01	3/02
505	2 [FTTF]	9/01	3/02
654	5	2/02	4/02
688	2 [FTTF]	3/02	3/02
Total = 5	Type 5 = 3 Type 2 = 2		

Type 4 = BellSouth Initiated
Type 5 = CLEC Initiated
Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)
FTTF = Flow Through Task Force

2 Pending Status Change Requests listed in the Change Request Log were excluded from this analysis because they were requesting changes to the CCP or were for the implementation of the next Industry Standard Release (ELMS-6).

Change Control Process Back Log

Candidate Request Status Back Log Detail

Candidate Request – Indicates a Change Request has completed the Change Review and prioritization process and is ready to be scheduled to a release. The most recent prioritization occurred on May 22, 2002.

Change Request #	Type	Submission Date	Status Date
3	5/2	3/00	4/01
85	4	6/00	4/01
88	5/2	6/00	4/01
101	5	7/00	4/01
104	5	7/00	4/01
113	5	7/00	4/01
127	5	8/00	4/01
135	5	8/00	4/01
176	5	9/00	4/01
178	4	9/00	4/01
179	4	9/00	4/01
184	5	9/00	5/02
186	5	9/00	4/01
221	4	12/00	4/01
246	5	12/00	5/02
273	5/2 [FTTF]	1/01	4/01
284	5	1/01	5/02
335	2 [FTTF]	3/01	4/02
336	4	3/01	4/01
367	5	8/99	4/01
392	5	5/01	5/02
408	4	5/01	5/02
439	4	7/01	5/02
440	4	7/01	5/02
443	5	6/01	5/02
466	5	8/01	5/02
495	2 [FTTF]	9/01	4/02
496	2 [FTTF]	9/01	4/02
506	2 [FTTF]	9/01	4/02
518	2 [FTTF]	10/01	4/02
563	2 [FTTF]	12/01	4/02
622	2 [FTTF]	1/02	4/02
625	2 [FTTF]	1/02	4/02
629	5	1/02	5/02
652	5	2/02	5/02
674	2 [FTTF]	2/02	4/02
675	5	2/02	5/02
676	5	2/02	5/02
690	5	3/02	5/02

Change Control Process Back Log

726	2 [FTTF]	7/01	4/02
728	2 [FTTF]	7/01	4/02
729	2 [FTTF]	7/01	4/02
Total = 42	Type 5 = 22 Type 4 = 8 Type 2 = 12		

Type 4 = BellSouth Initiated
Type 5 = CLEC Initiated
Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)
FTTF = Flow Through Task Force

Change Control Process Back Log

Scheduled Status Back Log Detail

Scheduled – Indicates a Change Request has been scheduled for a release.

Change Request #	Type	Submission Date	Status Date	Target Date	Interval (Months -1)
29	5/2	5/00	2/02	8/02	26
40	5	5/00	1/02	12/02	30
160	2 [FTTF]	8/00	3/02	8/02	23
196	4	10/00	2/02	8/02	21
215	5	11/00	2/02	12/02	24
228	2 [FTTF]	12/00	2/02	12/02	23
241	5	12/00	2/02	8/02	19
364	5	8/99	3/02	8/02	34
492	2 [FTTF]	9/01	2/02	12/02	14
541	5/2	11/0	5/02	8 & 12/02	11
707	2	3/02	3/02	8/02	4
725	2 [FTTF]	7/01	5/02	8/02	12
756	4/2/6	4/02	5/02	8/02	3
Total = 13	Type 5 = 6 Type 4 = 2 Type 2 = 5				

Type 4 = BellSouth Initiated
Type 5 = CLEC Initiated
Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)
FTTF = Flow Through Task Force

EXHIBIT 9

Change Control Process Back Log

2002 Implementation Analysis[1]

Implemented and Scheduled CR Implementations for 2002				
Feature Changes in Releases Implemented Through June 2, 2002	25		Defect Changes in Releases Implemented Through June 2, 2002	83
Feature Changes Scheduled in Releases Through Year End	13		Defect Changes Scheduled in Releases Through Year End	10
Total Feature Changes in 2002 Releases	38*		Total Defect Changes in 2002 Releases	93**

* CR's 0040 and 0541 are being implemented in phases. In the detail sheets following each phase is listed. In this summary each is counted only once.

** Defect CRs are also implemented independent of releases. See separate defect analysis for the total of defect CRs implemented.

Seven documented releases have occurred through June 2, 2002. Two more are planned through year end.

BellSouth has announced that there is no spare capacity for additional CR implementations in either of the two remaining releases planned for 2002.

[1] All information summarized here was obtained from the BellSouth Release Implementation Schedule information provided to the CLECs by e-mail on May 31, 2002. All documentation implementations have been excluded from this analysis.

Change Control Process Back Log

2002 Implementation Analysis[2]

	Release 10.3 Implemented January 5, 2002	Release 10.3.a Implemented January 11, 2002	Release 10.3.1 Implemented February 2, 2002
Number of Features	5	0	5 (4)
Submission Date of "Oldest" Request	8/99		12/99
Number of Defects	11	1	21
Submission Date of "Oldest" Request	8/15/01	1/9/02	8/15/01

	Release 10.3.2 Implemented February 9, 2002	Release 10.4 Implemented 3/23/02	Release 10.4.1 Implemented 3/28/02
Number of Features	0	7 (6)	0
Submission Date of "Oldest" Request		4/00	
Number of Defects	2	17	4
Submission Date of "Oldest" Request	10/12/01	11/15/01	3/18/02

	Release 10.5 Implemented June 1, 2002	Release 10.6 Scheduled for August 24, 2002	Release 11.0 Scheduled for December 7, 2002
Number of Features	11 (10)	8 (7)	5
Submission Date of "Oldest" Request	8/99	5/00	5/00
Number of Defects	27	9	1
Submission Date of "Oldest" Request	8/21/01	3/15/01	5/20/02

[2] All information summarized here was obtained from the BellSouth Release Implementation Schedule information provided to the CLECs by e-mail on May 31, 2002. All documentation implementations have been excluded from this analysis.

Change Control Process Back Log

Details of Release 10.3 Implemented on January 5, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
229	Feature / (4)	11/00	13 months
369	Feature / (5/2)	8/99	28
409	Feature / (2/4)	5/01	7
422	Feature / (2/4)	6/01	6
441	Feature / (2)	7/01	5
459	Defect	8/15/01	141days
527	Defect	10/19/01	78
530	Defect	10/25/01	72
532	Defect	10/25/01	72
536	Defect	10/31/01	66
537	Defect	10/31/01	66
540	Defect	11/5/01	60
542	Defect	11/6/01	59
570	Defect	12/7/01	29
571	Defect	12/7/01	29
573	Defect	12/12/01	24

Details of Release 10.3.A Implemented on January 11, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
602	Defect	1/9/02	2 days

Change Control Process Back Log

Details of Release 10.3.1 Implemented on February 2, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
40	Feature / (5)	5/00	20 months
133	Feature / (5/2)	8/00	17
371	Feature / (5)	12/99	25
557	Feature / (2)	11/01	2
606	Feature / (4)	1/02	1
459	Defect	8/15/01	169 days
498	Defect	9/24/01	130
580	Defect	12/21/01	43
588*	Defect	1/9/01	24
589*	Defect	1/9/01	24
590*	Defect	1/9/01	24
591*	Defect	1/9/01	24
592*	Defect	1/9/01	24
593*	Defect	1/9/01	24
594*	Defect	1/9/01	24
595*	Defect	1/9/01	24
596*	Defect	1/9/01	24
597*	Defect	1/9/01	24
598*	Defect	1/9/01	24
599*	Defect	1/9/01	24
600*	Defect	1/9/01	24
601*	Defect	1/9/01	24
608	Defect	1/11/01	22
610*	Defect	1/11/02	22
612	Defect	1/16/02	17
626	Defect	1/25/02	8

* These requests are to implement corrections to defects in BellSouth's implementation of the parsed customer service record. BellSouth has labeled these defects as being "low impact". Despite their classification these defects were implemented in advance of outstanding defects with greater impact and submitted earlier.

Change Control Process Back Log

Details of Release 10.3.2 Implemented on February 9, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
520	Defect	10/12/01	120 days
643	Defect	2/4/02	5

Details of Release 10.4 Implemented on March 23, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
Single C	Feature (2)	10/01	5 months
16	Feature (5)	4/00	22
40	Feature (5)	5/00	21
96	Feature (5)	6/00	20
137	Feature (5/2)	8/00	18
651	Feature (5/6)	2/02	1
657	Feature (2)	2/02	1
547	Defect	11/15/01	126 days
585	Defect	1/7/02	74
611	Defect	1/16/02	66
620	Defect	1/17/02	65
627	Defect	1/28/02	54
628	Defect	1/28/02	54
632	Defect	1/30/02	52
633*	Defect	1/31/01	51
634*	Defect	1/31/01	51
635*	Defect	1/31/01	51
636*	Defect	1/31/01	51
637*	Defect	1/31/01	51
638*	Defect	1/31/01	51
639*	Defect	1/31/01	51
658	Defect	2/12/02	39
681	Defect	3/6/92	17
703*	Defect	3/15/02	8

* These requests are to implement corrections to defects in BellSouth's implementation of the parsed customer service record. BellSouth has labeled these defects as being "low impact". Despite their classification these defects were implemented in advance of outstanding defects with greater impact and submitted earlier.

Change Control Process Back Log

Details of Release 10.4.1 Implemented on March 28, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
706	Defect	3/18/02	10 days
713	Defect	3/26/02	2
715	Defect	3/27/02	1
716	Defect	3/25/02	3

Details of Release 10.5 Implemented on June 1, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
20	Feature (5)	5/00	24 months
38	Feature (4)	5/00	24
40	Feature (5)	5/00	24
78	Feature (5/2)	6/00	23
145	Feature (4)	8/00	21
146	Feature (4)	8/00	21
365	Feature (5)	8/99	33
368	Feature (5)	8/99	33
461	Feature (2)	8/01	9
494	Feature (2 – FTTF)	9/01	8
557	Feature (2 – FTTF)	11/01	6
471	Defect	8/21/01	295 days
472	Defect	8/21/01	295
473	Defect	8/21/01	295
535	Defect	10/31/01	224
574	Defect	12/13/01	181
586	Defect	1/7/02	145
618	Defect	1/17/02	135
642	Defect	2/4/02	117
668	Defect	2/15/02	106
678	Defect	3/4/02	89
679	Defect	3/5/02	88
682	Defect	3/6/02	87
692	Defect	3/11/02	82
697	Defect	3/13/02	80
705	Defect	3/15/02	78

Change Control Process Back Log

724	Defect	4/3/02	59
737	Defect	4/9/02	53
739	Defect	4/10/02	52
740	Defect	4/10/02	52
741	Defect	4/10/02	52
744	Defect	4/11/02	51
745	Defect	4/11/02	51
767	Defect	5/7/02	25
770	Defect	5/7/02	25
774	Defect	5/13/02	19
781	Defect	5/16/02	16
787	Defect	5/17/02	15

Details of Release 10.6 Scheduled for August 24, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
29	Feature (5/2)	5/00	26 months
160	Feature (2 – FTTF)	8/00	23
196	Feature (4)	10/00	21
241	Feature (5)	12/00	19
541	Feature (5/2)	11/01	9
707	Feature (2)	3/02	4
725	Feature (2 – FTTF0	7/01	12
756	Feature (4/2/6)	4/02	3
339	Defect	3/15/01	412 days
682	Defect	3/6/02	165
693	Defect	3/12/02	159
704	Defect	3/15/02	156
730	Defect	4/3/02	136
743	Defect	4/11/02	128
753	Defect	4/23/02	116
769	Defect	5/7/02	102
800	Defect	5/31/02	78

Change Control Process Back Log

Details of Release 11.0 Scheduled for December 7, 2002

Change Request #	Type	Submission Date	Interval (Months for Features Days for Defects)
40	Feature (5)	5/00	30 months
215	Feature (5)	11/00	24
228	Feature (2 – FTTF)	12/00	23
492	Feature (2 – FTTF)	9/01	14
541	Feature (5/2)	11/01	12
788	Defect	5/20/02	200 days

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 25th day of July, 2002.

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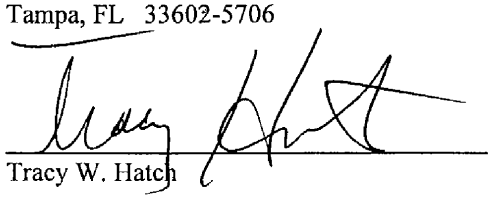

Tracy W. Hatch