BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY

OF

MARY CONQUEST

ON BEHALF OF

ITC^DELTACOM COMMUNICATIONS, INC.

DOCKET NO. 030137-TP

JUNE 25, 2003

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1	Q:	PLEASE STATE YOUR NAME, POSITION AND BUSINESS
2		ADDRESS.
3	A:	My name is Mary Conquest. I am Program Manager for Inter-
4		Company Relations, at ITC^DeltaCom Communications, Inc.,
5		("ITC^DeltaCom"). My business address is 4092 S. Memorial
6		Parkway, Huntsville, Alabama 35802.
7		
8	Q:	ARE YOU THE SAME MARY CONQUEST WHO PRESENTED
9		DIRECT TESTIMONY ON BEHALF OF ITC^DELTACOM IN THIS
10		CASE?
11	A:	Yes.
12		
13	Q:	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
14	A:	The purpose of my testimony is to respond to the direct testimony of
15		BellSouth witnesses Ronald M. Pate, and John A. Ruscilli.
10		
16		My testimony rebuts Issues 9, 66, and 67 for Mr. Pate's testimony;
16 17		My testimony rebuts Issues 9, 66, and 67 for Mr. Pate's testimony; Issues 2, 25, and 64, of Mr. Ruscilli's testimony.
17	Issue	
17 18	<u>Issue</u> Q:	Issues 2, 25, and 64, of Mr. Ruscilli's testimony.
17 18 19		Issues 2, 25, and 64, of Mr. Ruscilli's testimony.
17 18 19 20		Issues 2, 25, and 64, of Mr. Ruscilli's testimony.
17 18 19 20 21	Q:	Issues 2, 25, and 64, of Mr. Ruscilli's testimony. 2: Directory Listings (Ruscilli Pages 4-6 Begin Line 18) WHY IS ITC^DELTACOM REQUESTING DIRECTORY LISTING INFORMATION FROM BELLSOUTH?

conversion "some" listings were "dropped." Also another CLEC has
 indicated a program error at BAPCO has impacted 30% of its listings.
 Attached (EXHIBIT-MC-4) is BellSouth Carrier Notification
 SN91083548 describing a "workaround" process. The above
 examples confirm a need to validate the customer listings prior to
 publication of the directory.

7

8 Q: SHOULD BELLSOUTH BE REQUIRED TO PROVIDE AN

9 ELECTRONIC FEED OF THE DIRECTORY LISTINGS FOR THE

10 ITC^DELTACOM CUSTOMERS?

11 BellSouth in Mr. Ruscilli's testimony is now agreeing to allow

ITC^DeltaCom to adopt the AT&T language, however, they are stating 12 they do not have the ability to deliver the listings for ITC's subscribers 13 electronically. While the AT&T language clearly indicates a Directory 14 Listing Database, BellSouth claims it is unable to provide ITC a file of 15 its customer listings. Mr. Ruscilli attempts to cloud the issue by stating 16 that BellSouth is required to provide access to its directory assistance 17 database, rather than the publishing data and charges fees to do so. 18 Discussions regarding Directory Publisher Database Service, a filed 19 offering in Kentucky, Mississippi, Louisiana, and Florida, imply 20 BellSouth is willing to sell the listing information to outside publishers, 21 but not produce for its wholesale customer. 22

23

1	Q:	HOW DOES ITC^DELTACOM RESPOND TO PARAGRAH (c) OF
2		MR. RUSCILLI'S TESTIMONY, WHERE HE STATES, "DeltaCom
3		has the right to review and edit its customers' directory listings
4		through access to DeltaCom's own customer service records" ?
5		
6	A:	While ITC does have the listing information it requested, it is blind to
7		the BellSouth created omissions, corrections, and the BAPCO activity.
8		Therefore it is not possible to determine the exact listing using the
9		ITC^DeltaCom data.
10		
11	lssue	e 9: OSS Interfaces (Pate Page 7-9)
12	Q:	DOES MR. PATE ACCURATELY DESCRIBE OSS PARITY IN HIS
12 13	Q:	DOES MR. PATE ACCURATELY DESCRIBE OSS PARITY IN HIS TESTIMONY?
	Q: A:	
13		TESTIMONY?
13 14		TESTIMONY? Yes, he sites the orders, but fails to address the issues.
13 14 15		TESTIMONY? Yes, he sites the orders, but fails to address the issues. ITC^DeltaCom proposed that BellSouth provide access to all functions
13 14 15 16		TESTIMONY? Yes, he sites the orders, but fails to address the issues. ITC^DeltaCom proposed that BellSouth provide access to all functions for pre-order which are provided to the BellSouth retail groups. And I
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13 14 15 16 17 18		TESTIMONY? Yes, he sites the orders, but fails to address the issues. ITC^DeltaCom proposed that BellSouth provide access to all functions for pre-order which are provided to the BellSouth retail groups. And I quote, "Systems may differ, but all functions will be at parity in all areas, i.e. operational hours, content, performance. All mandated
13 14 15 16 17 18 19		TESTIMONY? Yes, he sites the orders, but fails to address the issues. ITC^DeltaCom proposed that BellSouth provide access to all functions for pre-order which are provided to the BellSouth retail groups. And I quote, "Systems may differ, but all functions will be at parity in all areas, i.e. operational hours, content, performance. All mandated functions, i.e. facility checks, will be provided in the same timeframes

1	Q:	MR. PATE ON PAGE 8 LINE 18-19, STATES "DeltaCom includes
2		in its issues matrix the phrase "same time frames and in the
3		same manner as provisioned to BellSouth retail customer"
4		because that is exactly what BellSouth already provides to
5		ALECs." DOES BELLSOUTH PROVIDE PARITY TODAY?
6		
7	A:	No, in my opinion Mr. Pate is aware of numerous differences. For
8		example BellSouth retail sees pending service order information in
9		detail, however CLECs must call the center to obtain a subset of the
10		data. BellSouth has SOCS updates almost real time, but CLECs must
11		use CSOTS updated nightly. BellSouth clearly does not in every
12		instance provide the information in the same time frames and in the
13		same manner.
14		
15	lssue	e 25: Provision of ADSL Where ITC^DeltaCom is the UNE-P Local
16		<u> Provider (Ruscilli, Pages 9-15)</u>
17		
18	Q:	ON PAGE 9 OF MR. RUSCILLI'S TESTIMONY HE STATES
19		BELLSOUTH DOES NOT HAVE ACCESS TO THE HIGH
20		FREQUENCY PORTION OF THE LOOP AND LACKS PERMISSION
21		TO PROVISION DSL, WOULD YOU COMMENT?
22	A:	Yes. In the past BellSouth has disclosed that it provisioned xDSL on
23		approximately 700 customers on UNE-P lines, a portion of these were

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1 ITC^DeltaCom end users. It should be noted that no issues were 2 encountered with the service. In fact ITC^DeltaCom offered to give 3 BellSouth the use of the upper or high frequency portion of the UNE-P line for free. Mr. Ruscilli claims on page 9 that, "many databases 4 would be need to be created to track which ALEC's are allowing 5 BellSouth to use their HFPL." This claim seems questionable since 6 ALEC's today have different relationships with BellSouth and with 7 8 each other.

9

Q. WHY SHOULD THE FLORIDA COMMISSION BE CONCERNED
 ABOUT BELLSOUTH'S TYING PRACTICES AND REQUEST FOR
 REVERSAL OF THE FDN AND SUPRA RULINGS WITH RESPECT
 TO DSL AND LOCAL VOICE SERVICE?

14

This Commission has ruled that the Florida consumer's should have 15 Α. 16 the right to choose their local service provider and DSL service provider. It has further ruled that DSL may be provided via UNE-P and 17 UNE loop. BellSouth is asking for the Commission to reverse its 18 19 position and agree to BellSouth's tying its arrangements. While I'm 20 not an attorney and do not claim to address the many legal rulings Mr. 21 Ruscilli has noted, I would note that consumers deserve the right to 22 choose, and it is apparent that technical ability is not an issue.

23

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4	lssu	e 64: ADUF(Ruscilli, Page 44-45)
5	Q:	MR. RUSCILLI STATES THAT ITC^DELTACOM IS ASKING FOR A
6		CUSTOMIZED REPORT, IS THIS TRUE ?
7	A:	No, we are asking that only access charges be passed via ADUF.
8		Previously Mr. Ruscilli had stated that the only local calls on the ADUF
9		file that ITC^DeltaCom pays for would be calls dialed as 1010XXX.
10		Mr. Ruscilli fails to acknowledge that UNE Port/Loop Switched
11		Combination Billing Arrangements, Call Flow 12 (EXHIBIT-MC-5)
12		states that until BellSouth modifies its billing system to not charge for
13		Unbundled Local Switching a ADUF record is sent, and the CLEC
14		pays for this record. BellSouth should only be placing call records and
15		billing the CLEC the ADUF charges for access. BellSouth is placing
16		records on the ADUF file inappropriately because of internal issues, of
17		which the billing system problem is one example.
18		
19		
20	lssu	e 66: Testing of End User Data(Pate, Page 10-16)
21	Q:	MR. PATE STATES ITC^DELTACOM SHOULD ACCEPT THE TEST
22		FACILITY AS PRESENTED, AND WAIT FOR THE CHANGE
23		CONTROL PROCESS TO WORK. DO YOU AGREE?

1	A:	ITC^DeltaCom has participated in the Change Control groups and
2		testing subcommittee and attempted to establish an effective test
3		methodology. Exhibit MC-5, May 9, 2002 clearly indicates
4		ITC^DeltaCom's request and BellSouth's knowledge of that request.
5		Mr. Pate states,CR 897 has been updated by the CLEC's; however,
6		BellSouth has recently been denying requests due to cost and
7		capacity. Currently, ITC^DeltaCom is not afforded the same testing
8		capabilities that BellSouth enjoys.
9	Q:	CAN YOU BE MORE SPECIFIC ABOUT BELLSOUTH'S TESTING?
10	A:	The BellSouth web site indicates the FID ETET is used for retail
11		testing. It is my understanding that this enables BellSouth to enter
12		their customer data as if a real order had been placed, flowing the test
13		data through the order, provisioning, billing and maintenance systems
14		as if a live request. Then the process removes the order and negates
15		the charges. BellSouth tells the CLEC's they may place real orders
16		and pay the applicable charges to do their testing.
17		
18	Q:	WOULD YOU CARE TO RESPOND TO MR. PATE'S COMMENT
19		REGARDING ISSUES THAT ITC^DELTACOM HAS CONCERNING
20		CAVE TESTING?
21	A:	Yes, Mr. Pate is aware ITC^DeltaCom has spent weeks testing EELs
22		ordering. Test cases prepared by BellSouth SME's are not under the
23		control of CCP, and had to be corrected and resubmitted three times.

1	ITC^DeltaCom was told when it did not receive its acknowledgement
2	that it was because of a "defect," ITC^DeltaCom followed Mr. Pate's
3	suggestion and filed a change request (CR 1170). CCP strongly
4	suggested this be cancelled, while clearly a coding defect existed in
5	the CAVE area. ITC^DeltaCom was told it was inappropriate to post a
6	CR for a CAVE defect, yet no process other than a CR exists. Were
7	ITC^DeltaCom afforded the same testing as BellSouth, the orders
8	would have ITC^DeltaCom's own customer data, and both BellSouth
9	and ITC^DeltaCom could both benefit from the resources used to test
10	data. In fact BellSouth indicates as of April 14,2003, 86% of the
11	coding capacity has been used to correct defects. ITC^DeltaCom also
12	agreed to assist Birch in the beta testing of allowing CLEC's to view
13	each other's Customer Service Record data. After completing the
14	BIRT (BellSouth Interface Registration Tool) requests, exchanging
15	Letters of Authorization, Operating Company Numbers and account
16	data, Birch and ITC^DeltaCom were advised that no test ability was
17	being provided for CR 184/246. (EXHIBIT- MC-6 attached.)
18	
19	Issue 67: Availability of OSS Systems (Pate, Page 16-20)
20	Q: DO YOU AGREE WITH MR. PATE THAT NO ALEC VOICED
21	OPPOSITION TO THE OUTAGE?
22	A: No. In fact because of my escalation, the CLECs were granted 1-hour

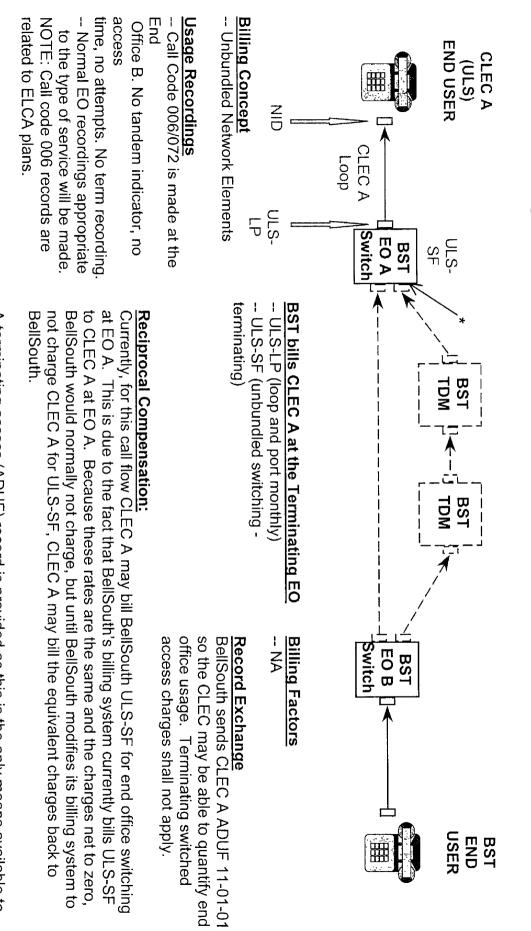
23 additional time. EXHIBIT- MC-7 attached is the correspondence

1		between myself and Jill Williamson, documenting my escalation.
2		ITC^DeltaCom does not believe that BellSouth can work on all of its
3		systems at the same time, and should agree to staggering the outages
4		at least until 5 PM during normal work days. ITC^DeltaCom
5		understands that emergency outages will occur, but planned system
6		upgrades should be outside of normal scheduled work hours. A
7		system upgrade is not an emergency situation.
8	Q:	MR. PATE CLAIMS THAT HIS EMPLOYEES WERE
9		INCONVENIENCED BY THE ALECS BECAUSE THEY HAD TO
10		WORK DURING THE HOLIDAY, WOULD YOU CARE TO
11		COMMENT?
12	A:	Yes. This is clearly another example of BellSouth's poor management
13		of the business. It should also be noted that BellSouth refuses to
14		answer if their retail internal systems were down during this period. To
15		have staff available to work on all systems at the same time is
16		inconceivable to a small ALEC. While ITC^DeltaCom did not track
17		prior to 2002 the down time, it would suggest a trend developed in
18		2002. First Carrier Notification SN91082957 extends the downtime by
19		one hour, then in September Carrier notice SN 91083330 extends the
20		EDI down time by five hours, finally in December as indicated in my
21		direct testimony, systems were down during normal business hours.
22		This indicates a possible trend toward extended down times. Also
23		given the number of coding defects, emergency maintenance

1		releases, etc., the potential for further outages during normal working
2		hours should be deemed a valid concern.
3		
4	Q:	DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?
5	A:	Yes.
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12. BST Network - Call terminating outside of the originating 7 & 10 digit dialing UNE PORT/LOOP SWITCHED COMBINATION BILLING ARRANGEMENTS CLEC A arrangement but within the lata (i.e. 1+ call) - Interoffice BST



shall not be billed to BellSouth as BellSouth treats such calls that it terminates as rates and not terminating access provide CLEC A a way to quantify the terminating usage. However, access charges A terminating access (ADUF) record is provided as this is the only means available to Local calls and bills the originating ULS CLEC Unbundled Local Switching at the UNE

Witness: Conquest Docket No. 030137-TP _ (MC-4)

indicates demarcation

between UNE Network and

other Networks

Page 1 of 1 Exhibit



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May 9, 2002 BellSouth Testing Process MEETING MINUTES

MEETING NAME	MINUTES PRE	PARED BY	date prepared 5/9/02	
BellSouth Testing Pro	cess Meeting Change	Management Team		
Participants/Attendee		PARTICIPANT	COMPANY	
Vickie Beachley	BST	Mary Conquest	ITC Deltacom	
Valerie Cottingham	BST - CCP	Bill Grant	Telcordia	
Linda Jones	BST - CCP	Jimmy Patrick	BST	
Mel Wagner	Birch	Graham Watkins	KPMG	
John Duffey	Fla. PSC	Tammy Swanson	Accenture	
Matt Beymon	Tel Excel Partners	Jay Bradbury	AT&T	
Tyra Hush	WorldCom	Eric Paschal	BST	
Dale Donaldson	Epb Telecom	Blanche LaFavor	BST	
Bernadette Seigler	AT&T	Marcia Moss	BST	
Annette Hardy	Access Integrated	Dave Riley	BST	
Steve Huff	BST	Brenda Thomas	BST	
Rose Kirkland	BST	Colette Davis	Covad	
Rich Bobik	AT&T	Donna Cain	AT&T	
Nicole Drier	Birch	Bob Caris	NıghtFire	

Meeting Information History

DATE	START TIME	END TIME
5/9/02	9:30 AM ET	3:00 PM ET
Conf. Bridge	205 968-9300	176589

MEETING PURPOSE

- Review and Refine New BellSouth Testing Process
- Revise Language in Section 10 of CCP
- Create CRs for CAVE Enhancements



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May 9, 2002 BellSouth Testing Process MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. Introductions/Welcome	Vickie Beachley opened the meeting and state that the purpose of this initiative, which is to improve the current testing process.



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May 9, 2002 BellSouth Testing Process MEETING MINUTES

Agenda Items	Discussion
2. Coverage of CLEC Interface Testing Practices and Procedures	 Eric Paschal began by reviewing the document and asking for CLEC opinions. Jay Bradbury requested clarification on what phases of testing are required/available for CAVE vs. Traditional test environment. Eric will be sure the document addresses the difference between the two environments.
	 Mary Conquest expressed concern with the present testing structure. She wants to test new products in a production mode. Bernadette Seigler said AT&T wants to be able to test in a mode that mirrors production. Eric explained that the CAVE environment ties to production systems, and that there won't be extensive blackout periods in which you can't test through CAVE.
	• Tyra Hush, Jay and Bernadette requested that testing be set for them to use real live data, especially the fields that are specific by CLEC. That way they can test their systems' use of BellSouth's systems.
	• Bernadette expressed concern that using pre-existing test data comes up with "canned" responses. Eric assured her that she sees the actual system response, and that only certain TAG testing phases hit a simulator returning pre-planned responses.
	 Another concern expressed was the ability to regression test all features, rather than being limited to set specifics. BellSouth will address these concerns in the action items.
	 Bernadette questioned BellSouth's testing environment and support hours. Vickie explained that BellSouth will continue to accommodate special request on a per case basis for CLECs who need to test in times other than 8 – 5. Vickie agreed to investigate expansion of the test environment availability hours and test manager support hours.
	 Rich Bobik recommended that in notification options used in the phases of testing be expanded to include e-mail vs. just verbal.
	There was discussion of the defect management process for CAVE testing. Bernadette asked that the detailed definition of test defect severity levels be communicated within the document. Tyra Hush also stated that an e-mail notification of validated defects would be helpful, in addition to the daily status report.



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May 9, 2002 BellSouth Testing Process MEETING MINUTES

	MEETING WINDTES
Agenda Items	Discussion
-	 Matt Beynum expressed concern with regards to the test scenarios provided during TAG simulator based testing. Steve Huff explained that BellSouth is working on replacing the scenarios with test cases that match the Business Rules. The discussion ended with BellSouth still working toward a July completion date. The web site, which is contingent on the process being complete, must be developed before the old forms can be eliminated.
	EW ACTION ITEM: Dave Riley will check for any additional issues or rther limitations involved with maintaining both test environments.
	EW ACTION ITEM: Eric Paschal will add verbiage to explain which ocuments will go away (pg. 4)
	EW ACTION ITEM: Eric will add clarity to the paragraph explaining the fference between the traditional and CAVE test environments (pg. 5).
	EW ACTION ITEM: Eric will add a flow chart to the document showing eneral testing flow.
	EW ACTION ITEM: Vickie Beachley will look into providing extended hours r testing both for systems and human support.
1	EW ACTION ITEM: Eric will add LENS and EDI examples (pg. 7).
	EW ACTION ITEM: Vickie will address the ability to test all features (rather an specific sets) in building test case scenarios.
	EW ACTION ITEM: Eric will true up the references to implementation teams and other phases (who goes with which phase) (Pg. 10, procedure).
N	EW ACTION ITEM: Eric will discuss timeframes for reporting on defects.
	EW ACTION ITEM: Eric will look at further outlining the process of defects progression testing.
or	EW ACTION ITEM: Valerie will verify whether CLECs (a) will have a vote a go-no-go of BellSouth production releases and (b) will be able to test on ellsouth production releases.
	EW ACTION ITEM: All should send specific recommendations or concerns pout the testing process to the Change Control mailbox.
	EW ACTION ITEM: Eric will provide a template of the daily status report ithin the testing document.



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May 9, 2002 BellSouth Testing Process MEETING MINUTES

····		MEETING MINUTES
Agenda Items		Discussion
2. Develop Change Request s for potential CAVE Enhancements		The group stressed the desire to move away from the mandatory "9999" based testing in CAVE and use real data. Bernadette pointed out that she needed to test using AT&T's systems. A certain amount of dummy customer information can work, but the BAN and other information specific to the CLEC needs to be allowable.
		Bernadette request that BellSouth draft the change request for the enhancements to CAVE, instead of the CLEC community. Once drafted, the CLECs would review to ensure that the intent was captured. The CLECs could then submit and prioritize those change request.
		TION ITEM: BST to prepare draft change request to allow CLECs to test using their own data.
		TION ITEM: BST to draft change request allowing multiple versions of EDI in CAVE testing.
3. Proposed language for section 10. of Change Control Process		The group went over the document, including Jay's email.
	NEW AC	TION ITEM: The CLECs will re-write section 10 based on the proposals
	discussed	in the meeting and submit to the group for concurrance/review.
Next Meeting		May 30, 9:30 – 3:30 at BellSouth Center.



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May 9, 2002 BellSouth Testing Process MEETING MINUTES

5/16/20025/15/2002

06-04-2003

Please note that the feature that allows CLECs to view other resellers and UNE-P accounts will be available in Release 13.0; however this feature cannot be tested in the CAVE environment. The only accessible company code utilized in CAVE is "9999". The feature will be available in production on June 22, 2003 * * DeltaCom will need to go into LENS and grant permission for Birch to view their customer's CSRs based on the company codes. Permission may also be ungranted by DeltaCom. Birch's test window will be extended until June 30, 2003 to allow * them to test this feature in production. Thank you, Carol Nelson-ECAT 205.321.5729 Phone ***** "The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers."

DOCKET 030137-TP WITNESS: CONQUEST EXHIBIT (MC-7) PAGE 1 OF 3

12-02-2002 RE: SN91083483 Mary,

BellSouth will agree to slide its implementation window for release 11.0 by one hour. CLECs will need to stop sending in LSRs at 1:00 EST on Friday, December 27, 2002. The production systems will be turned back up on December 29 at 10:00 pm EST. Once the installation is complete and the production systems are brought back up, BellSouth must complete its production verification testing and resolve any resulting issues prior to production on Monday. Thus, we cannot risk sliding the installation window any further out. I hope this helps. Thanks

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Jill Williamson
Director - BTS Network Services
404-927-4790 /
jill.williamson@bellsouth.com
ipager: jillwilliamson
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-----Original Message-----From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com] Sent: Tuesday, November 26, 2002 4:33 PM To: mconquest@itcdeltacom.com Subject: Re: SN91083483

Mary,

BellSouth's intent with the original production date for Release 11.0
was to
take the systems down at 5:00PM EST. However, given the large number of
necessary hardware and configuration changes and the complications
we've
experienced with the release, BellSouth needs to take the system down
earlier.
This ensures that adequate time is allowed to make the necessary
hardware and
configuration changes to install all of the software and to test and
debug
prior to the release coming up in production on Monday morning.
Please let us know if you have questions.

Thanks, Change Management Team

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=->Change Control or Jill, =->Can you please acknowledge the attached e-mail. Did you receive? Are you =->considering? =->I understand you may not have answer, but can you give an indication as to =->when you might be able to discuss? My VP is requesting an answer, and I =->don't have one.... =->Happy Thanksgiving! =->Mary =->---- Forwarded by Mary Conquest/DeltaCom on 11/26/2002 08:15 AM ---- -=-> =-> =-> =-> =-> Mary Conquest ≃-> <u>∽</u>-> =-> To: =-> 11/22/2002 04:19 **=**-> Change.Control@bridge.bellsouth.c =->om Nanette ΡМ cc: =-> =~> =-> Edwards/DeltaCom@DeltaCom, (bcc: =->Randy Tucker/DeltaCom) =-> =-> Subject: Re: =-> SN91083483 (Document =->link: Randy Tucker) =-> =-> ≂-> =-> ≂-> =-> =-> =->Change Control,

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DOCKET 030137-TP WITNESS: CONQUEST EXHIBIT _____ (MC-7) PAGE 3 OF 3

=->I thought we were under the understanding that our people would be working, =->and to take away ALL our tools, EDI, LENS and TAG at 11 on Friday the 27th =->just isn't acceptable. I notice you propose to restore service Sunday =->evening at 8. I'd like to request you leave the systems working until 3 =->and restore at midnight. =->Thank You for your consideration. =->Mary =-> =-> = - > =-> = ~ > = - >

"The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers."