BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.	))))	Docket No. 030851-TP

REBUTTAL TESTIMONY OF

MARK DAVID VAN DE WATER

ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC

JANUARY 7, 2004

REDACTED VERSION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Mark David Van de Water. My business address is 7300 East Hampton Avenue, Room 1102, Mesa, AZ, 85208-3373.

Q. ARE YOU THE SAME MARK DAVID VAN DE WATER WHO PREVIOUSLY FILED DIRECT TESTIMONY IN THIS DOCKET ON DECEMBER 4, 2003?

A. Yes, I am.

I. INTRODUCTION

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. My testimony refutes the claims of BellSouth's and Verizon's witnesses that their proposed batch processes are capable of providing high quality, seamless migrations in sufficient volumes, and thus demonstrates that they do not remove the impairment that manual hot cuts create for CLECs.

Q. BEFORE ADDRESSING THE DETAILS, COULD YOU PLEASE PROVIDE A HIGH LEVEL SUMMARY OF YOUR REACTION TO BELLSOUTH'S PROPOSAL?

A. In its purported effort to comply with the TRO, BellSouth offers the same manual provisioning process from the 271 case, along with a batch ordering process, both of which were created before, and make no effort to comply with, the TRO mandates that govern this case. BellSouth unabashedly ignores the findings of the FCC that rejected ILEC arguments regarding the relevance of 271 decisions and current performance measurement results to the TRO hot cut requirements. Moreover, it makes no effort to comply with the FCC's directive that the state

commissions establish a batch hot cut process. Instead, despite a national finding of impairment, BellSouth maintains that nothing needs to be done to its existing individual hot cut process. While it dresses up that process by adding the "batch" tag to it, even BellSouth admits that its hot cut process is the same as it was before the FCC issued the TRO.

BellSouth also ignores the FCC's purpose for establishing a batch hot cut process, to reduce the economic and operational barriers posed by the present hot cut process. Instead, it offers the inadequate batch ordering/individual hot cut provisioning process to be used to migrate the embedded base of UNE-P in the event of a finding of no impairment. And, while BellSouth promises it will achieve the anticipated increase in volumes, I have numerous concerns about un-addressed issues and contradictory analyses I describe in more detail later in my testimony. BellSouth's feeble proposal exacerbates the "haves" and "have nots" environment that removal of unbundled switching would create: CLECs will be handicapped by a manual, high-cost process for their customers while BellSouth enjoys an electronic, low-cost process for most of its customers.

BellSouth also ignores that its performance for hot cut migrations is inferior to UNE-P migrations for ordering and provisioning, forcing CLECs and their customers to inferior and inefficient service if unbundled local switching is no longer available as an option. Finally, BellSouth ignores the basic reality that its "batch" ordering process excludes customers who obtain DSL services via a line-splitting arrangement and those who would like to move from one CLEC to another.

In short, BellSouth's batch process falls short in a number of key aspects of the TRO's mandates regarding the hot cut process.

Q. WHAT IS YOUR REACTION TO VERIZON'S BATCH PROPOSAL?

A. The major problems with Verizon's proposed Batch hot cut process include:

- It deprives CLECs of control over our end-user customer's experience in three essential respects --
  - Inability to permit customers to make changes to their account for up to over five weeks;
  - Inability to control the time of day, and day of week, that customer's service will be interrupted – and put at risk for greater interruption – by a hot cut;
  - Inability to monitor the quality of the cut during the critical period between the cutover of the loop and the activation of the number port at NPAC;
- No operational processes, methods and procedures, or system messages have been defined, documented, tested or operationalized;
- There is no experience of "live production" operations in a real world environment;
- There is no control over, and complete uncertainty with respect to the cost of the "UNE-P like" service arrangement required to use the batch process for new customers;
- There is a total lack of CLEC control over the sequence in which the lines of a multi-line order are cut;
- An apparent lack of pre-wiring and dial-tone checks gives Verizon no "margin of error" if something goes wrong on the day of the cut;
- There is no provision at all for handling IDLC loops within the Batch process, and the proposed price under the Basic process for converting IDLC loops is not commercially viable;

- Verizon's batch process does not accommodate line split or line share orders; these plainly are higher revenue customers so obstructing access to them is a particular concern;
- There is no provision for handling CLEC-to-CLEC migrations; and
- Lack of metrics and penalties that would ensure a Verizon commitment to the process it proposes.

In short, AT&T has not asked, nor does it want Verizon to take control over its customers' experience. In proposing this process, Verizon is not offering a better process nor is Verizon offering a process that AT&T would utilize. Moreover, eliminating the ability of CLECs to control the experience of their new customers means that the Verizon's proposed process will not benefit customers.

II. THE 271 CASE AND CURRENT PERFORMANCE RESULTS ARE IRRELEVANT TO THIS PROCEEDING

Q. WHAT IMPACT DOES THE FLORIDA COMMISSION'S DECISION TO RECOMMEND THAT BELLSOUTH BE PROVIDED 271 APPROVAL HAVE ON ITS REVIEW OF THE ADEQUACY OF BELLSOUTH'S HOT CUT PROCESS IN THIS PROCEEDING?

A. Very little. The FCC noted that because of the new competitive environment being considered (without CLEC access to unbundled local switching), decisions made in 271 proceedings were not adequate to support a finding that competitive carriers would not be impaired if they were required to rely on the hot cut process to serve all mass market customers. The FCC specifically found that:

> [T]he Commission's prior findings in section 271 orders do not support a finding here that competitive carriers would not be impaired if they were required to rely on the hot cut process to serve all mass market customers. . . . [T]hese orders examined the adequacy of hot cuts at a time when

> competitive LECs were principally using unbundled local circuit switching to compete for mass market customers. . . . Here, we must consider the adequacy of current hot cut practices for handling the volumes that would be expected if competitive LECs were denied unbundled access to unbundled local circuit switching - something that was by no means "reasonably foreseeable" in the context of the section 271 orders. ***The section 271 orders thus tell us very little about a BOC's ability to provision large batches of cut overs in a timely and reliable manner under these circumstances.***

TRO at n.1435 (emphasis added).

In spite of these very clear, explicit findings by the FCC, BellSouth starts in exactly the place the FCC said this Commission should not start. BellSouth goes to great lengths to repeatedly remind this Commission that it has previously reviewed BellSouth's hot cut process and found it sufficient to recommend 271 relief for BellSouth. (See Direct Testimony of BellSouth witnesses John Ruscilli at page 17, Kenneth Ainsworth at pages 6 and 9, and Ronald Pate at page 13.) BellSouth would have this Commission take its individual hot cut process considered as part of the 271 review and apply it going forward, relying on BellSouth's promises that it can be scaled to handle the anticipated increase in volume. However, as the FCC has said, BellSouth's processes must be examined anew to determine if they constitute impairment when considered in conjunction with the elimination of the local circuit switch as an unbundled network element that must be provided by ILECs.

Q. DOES VERIZON ALSO RELY ON 271 APPROVAL?

A. Yes. See page 24 of Verizon's Direct Panel Testimony.

Q. ON PAGE 14 OF HIS TESTIMONY, MR. PATE DISCUSSES THE VOLUME TESTING CONDUCTED BY THE FLORIDA KPMG THIRD PARTY TEST. DID KPMG CONDUCT VOLUME TESTING OF HOT CUTS?

A. No. The testing to which Mr. Pate refers was for ordering only; provisioning was not subject to volume testing. Further, the types of orders tested do not appear to be, for the most part, the type of orders involved in hot cuts. As page 263 of the KPMG Final Report notes:

> The majority of the orders transmitted during the test were limited to those that flow through BellSouth's order processing systems without human intervention. Transactions submitted during the POP Volume Performance Test (TVV2) did not go through the physical provisioning process.

As I described in my direct testimony, only 24% of BellSouth's loop with LNP orders did not require manual handling, and are therefore not representative of the "majority" of the order types tested by KPMG. In other words, the results of the volume testing do not reflect the ability of BellSouth to handle any volume of hot-cut orders. Moreover, the third-party test did not even attempt to review BellSouth's ability to provision any volume of hot cuts. Accordingly, although the volume testing was a worthwhile part of the overall testing of BellSouth's OSS, and was useful for the 271 proceedings, it has no relevance in this proceeding.

Q. WHAT IMPACT SHOULD BELLSOUTH'S CURRENT LEVEL OF PERFORMANCE IN EXECUTING HOT CUTS AND PROVISIONING LOOPS HAVE ON THIS COMMISSION'S REVIEW OF THE ADEQUACY OF BELLSOUTH'S HOT CUT PROCESS IN THIS PROCEEDING?

A. As currently reported by BellSouth, it is of little value to the Commission for two primary reasons. First, the FCC specifically rejected ILEC arguments that performance data showed that current hot cut performance was satisfactory (the same arguments BellSouth's witnesses make in their direct testimony). The FCC found "the issue is **not** how well the process works currently with limited hot cut volumes . . . ." TRO at ¶ 469 (emphasis added). Second, in explaining why state commission might review commercial performance data, the FCC noted that "This review is necessary to ensure that customer loops can be transferred from the incumbent LEC's main distribution frame to a competitive LEC collocation ***as promptly and efficiently as incumbent LECs can transfer customer using unbundled local switching***." TRO at n. 1574 (emphasis added). The performance data provided by BellSouth in this proceeding provides no such analysis. It does not allow a comparison between the efficiency of transferring a customer using unbundled local switching and the efficiency of transferring a customer using a hot cut. For additional concerns with the performance data provided by BellSouth, see the rebuttal testimony of AT&T witness Cheryl Bursh.

III. THE INADEQUACY OF THE ILEC'S BATCH PROCESSES

A. Neither BellSouth nor Verizon Have Developed Viable Processes

Q. DOES BELLSOUTH'S HOT CUT PROVISIONING PROCESS PROPOSED IN THIS PROCEEDING DIFFER FROM THE PROCESS IT PROPOSED DURING THE FCC'S TRIENNIAL REVIEW DELIBERATIONS?

A. No. In spite of the FCC's findings that "the overall impact of the current hot cut process raises competitors costs, lowers their quality of services, and delays the

provisioning of service" (TRO at ¶ 473), BellSouth has made no effort to improve its current hot cut process through the establishment of a batch hot cut provisioning process. In fact, BellSouth's witness Ainsworth admits "the provisioning process I discuss here is the same process reviewed during the 271 case." (See Ainsworth Direct at page 9) Indeed, BellSouth's definition of a "batch hot cut" does not even include provisioning as part of what must be done in a batch: "[a] batch hot cut is like any other hot cut except for the ordering and pre-ordering processes. For batch hot cuts the process is designed to facilitate ***ordering*** large volumes of loop hot cuts simultaneously." (See Varner Direct at page37) (emphasis added) This definition is quite surprising since the TRO is very clear that provisioning is an essential part of the batch hot cut process. TRO at ¶ 489; *see also* ¶ 488 ("state commissions possess the competence to implement a cost-effective and fast process for **provisioning** unbundled local loops.")(emphasis added).

Q. HAS BELLSOUTH BEEN WILLING TO COLLABORATE WITH THE CLEC COMMUNITY REGARDING THE DEVELOPMENT OF A "BATCH" ORDERING PROCESS?

A. No. In recent informal workshops held by the Alabama Public Service Commission and the Tennessee Regulatory Authority, BellSouth indicated that it felt its process was satisfactory and it saw no need to collaborate with CLECs regarding changes to its process. Similarly, BellSouth has resisted efforts by CLECs to have a batch process addressed in the Change Control Process (CCP) meetings. (See Rebuttal Exhibit MDV-R1)

Q. HAS VERIZON COLLABORATED WITH CLECS REGARDING ITS "BATCH" PROCESS?

A. No. AT&T and other CLECs have worked with Verizon in New York on a "large job" or "project" process. It appears Verizon has proposed the essentially the same batch process in Florida as it did in New York. It is my understanding that the "batch" process appears to have been developed by Verizon for its own purposes, without significant, and perhaps without any, input from CLECs.

Q. HAVE OTHER ILECS MADE CHANGES TO THEIR BATCH HOT CUT PROCESS IN RESPOSE TO CLEC COMMENTS?

A. Yes. While these changes have not resolved all the issues between CLECs and the ILEC regarding how batch hot cut processes should operate, they have resulted in improvements to the process, and narrowed the scope of the issues to be addressed by the state commissions. For example, SBC has proposed a batch hot cut process that includes the following proposed advantages over their existing process:

- Flexible scheduling
- Eliminates negotiation steps and time involved
- Provides defined interval to allow for CLEC resource planning
- Provides CLECs an ability to reserve time
- Wire center based to provide CLEC the ability to convert multiple central offices on the same day
- Includes requests involving IDLC cuts
- Mechanized order flow
- Reservation tool
- Pre-order IDLC tool

Q. ON PAGE 3 OF HIS TESTIMONY, MR. AINSWORTH STATES THAT THE HOT CUT PROCESS IS NOT DIFFICULT OR CUMBERSOME. DO YOU AGREE?

A. No. As I described in detail in my direct testimony, hot cuts are much more complex, manual, and costly than UNE-P migrations, requiring numerous steps which must be coordinated if a cut is to be successful in limiting the time the customer is out of service.

It is also noteworthy that BellSouth is not usually so dismissive of the work activities associated with hot cuts. For example, in 271 testimony filed in North Carolina, BellSouth witness Milner pointed out that coordinated loop cutovers "involve a number of steps," and that "the loop cutover is much more complicated in terms of the work steps involved (on the part of both BellSouth and the CLEC) than the number porting." (See Rebuttal Exhibit MDV-R2)

Q. ON PAGE 12 OF HIS TESTIMONY, MR. AINSWORTH INDICATES THAT DURING 2003 THE END-USER HAS BEEN "WITHOUT CALLING CAPABILITY" DURING A HOT CUT FOR AN AVERAGE OF ONLY 2.39 MINUTES. IS THIS ACCURATE?

A. First, this statement is accurate only for the capability to make outgoing calls. An end-user will not have incoming call capability until BellSouth has notified the CLEC that the cut-over is complete and the CLEC ports the telephone number to its switch. Further, while BellSouth reports performance of under three minutes, it insists in performance measures proceedings on being able to keep the customer out of service for 15 minutes, should it so choose. In a mass market scenario where thousands of residential customers will have their service disrupted through loop migrations, it is likely that E-911 services will be needed, but inaccessible, during this 15-minute period. The Commission should establish performance standards that provide a greater level of consumer protection. For example, a

standard of 5 minutes would be more than adequate to provide BellSouth the time it ostensibly needs, but puts the customer at less risk for an unnecessary service outage.

Further, the performance described above only applies to those cuts that go as expected. Based on BellSouth's own performance data, when service outages occur during a cutover, the consequences for the customer are severe. For example, in October 2003, even under the current minimal hot cut volumes that BellSouth is completing in Florida, customers who experienced a service outage during a coordinated hot cut were out of service an average of ***seventeen*** hours; in November they were out an average of ***eighteen and one-half*** hours[1]. Further, based on BellSouth's most recent SQM report results of customer lines involved with a hot cut that resulted in a trouble report on the line within seven days of the hot cut,[2] BellSouth's s hot cut process could result in the (lengthy) loss of service for well over 1000 customers (1,174 customers) each month during its conversion activity if the availability of unbundled switching is eliminated.[3] These are outages that customers will have to bear simply because they were naïve enough to believe that the industry was capable of transferring their local service to another service provider in a seamless fashion as has been the case for years when they wished to change their long distance carrier.

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[1] (See BellSouth's MSS Reports for Measure P7-B, Coordinated Customer Conversions-Average Recovery Time)

[2] See BellSouth's November SQM results for Measure P7-C, Hot Cut Conversions--% Troubles Received Within 7 Days.

[3] 91,755 monthly conversions as forecasted by BellSouth Witness Heartley in Exhibit AH-1 multiplied by 1.28%.

Q. HAS VERIZON CONDUCTED AN ASSESSMENT OF WHAT THE IMPACT ON CUSTOMER SERVICE WILL BE AS A RESULT OF ALL OF THESE ADDITIONAL PEOPLE PERFORMING MANUAL WORK ON CUSTOMER'S LINES?

A. Apparently not. No such information was provided in its testimony.

Q. IN YOUR DIRECT TESTIMONY, YOU POINTED OUT THAT BELLSOUTH'S BATCH ORDERING PROCESS DID NOT PERMIT TIME SPECIFIC CUTS. HAS BELLSOUTH CHANGED ITS POSITION?

A. No. BellSouth still makes no commitments to provide time specific cuts. BellSouth only says that a CLEC ***may request*** that ***some*** of their coordinated conversions be converted within a specified window of time (See Ainsworth Direct at page 24 (emphasis added).) BellSouth has no obligation to grant the CLEC's request.

Q. ON PAGE 4 OF HIS TESTIMONY, MR. PATE REFERENCES LANGUAGE FROM AT&T'S NOVEMBER 2000 CHANGE REQUEST FOR UNE TO UNE BULK MIGRATIONS. DID MR. PATE INCLUDE ALL OF AT&T'S PROCESS DESCRIPTION?

A. No. Mr. Pate's Exhibit RMP-1 is a copy of AT&T's change request. That request includes the following additional language not mentioned by Mr. Pate. "An option for doing the migrations (done by another ILEC) is that BellSouth and AT&T would schedule the cuts by central office to take place over a weekend. Our experience with this process has been a very low number of customer outages." Unfortunately, BellSouth remains unwilling to implement a process that permits CLECs and BellSouth together to select and manage the timing of the cuts, despite the FCC's finding that "the record evidence strongly suggests that

the hot cut process could be improved if cutovers were done on a bulk basis, ***such that the timing and volume of the cutover is better managed.***" TRO at ¶ 474 (emphasis added).

Q. DO YOU HAVE OTHER CONCERNS WITH BELLSOUTH'S PROPOSED BATCH ORDERING PROCESS?

A. Yes. As addressed in my direct testimony, BellSouth's batch ordering process does not include customers who obtain DSL services via a line-splitting arrangement or those customers who would like to move from one CLEC to another. Batch processes are to be established to reduce impairment, and no customer groups should be left out.

Q. ON PAGES 22-24 OF HIS TESTIMONY, MR RUSCILLI DISCUSSES CO-CARRIER CROSS-CONNECTS, INCLUDING THE FACT THAT BELLSOUTH "ALLOWS" CROSS-CONNECTS TODAY. IS BELLSOUTH CURRENTLY MEETING THE REQUIREMENTS OF THE TRO?

A. No. As I discussed in my direct testimony, the FCC stated "we have also determined that an incumbent LEC's failure to *provide cross-connections* between the facilities of two competitive LECs on a timely basis can result in impairment." TRO at¶ 514 (emphasis added). The expensive and cumbersome process described by BellSouth merely permits CLECs to install dedicated cabling between their collocations; BellSouth does not *provide* cross-connections.[4] Absent efficient means of providing these cross-connections,

[4] A CLEC needing to cross connect to multiple other CLECs must install dedicated cabling to each CLEC's collocation.

CLECs will not be able to offer voice and data services by partnering with another CLEC that provides data services.

Q. BELLSOUTH ALSO STATES THAT BEGINNING IN THE FIRST QUARTER 2004, IT WILL ALSO PROVIDE A CROSS CONNECT FOR BOTH CLECS AT A DEMARCATION POINT. WILL THIS ADDRESS THE FCC's CONCERNS?

A. No. BellSouth's new FCC tariffed "Special Access product" will require that the CLECs wishing to have BellSouth provide a cross connection on BellSouth's frame between a connecting facility assignment ("CFA") from one CLEC's collocation to a CFA in a second CLEC's collocation to engage in "line splitting" of a local loop (not otherwise subject to the FCC's jurisdiction) certify that the traffic carried on that CFA to CFA connection (a frame jumper wire) meet the FCC's de minimus (10%) interstate rule. This unnecessarily subjects a non-complex POTS mass market line to cumbersome procedures such as certification and audits, and irrelevant obligations such as the requirement that the line carry at least 10% interstate traffic.

Further, BellSouth's new "product" cannot be ordered efficiently. UNE local loops are ordered on a Local Service Request ("LSR"). When such a loop is to be "split" between two CLECs, BellSouth will require that the connection necessary to accomplish the "split" be ordered and provisioned out of its FCC Access Tariff using an Access Service Request ("ASR"). There will be no means of electronically ordering such an arrangement and the coordination, through relating the LSR and ASR, that will be required to establish working services (voice and ADSL) for the customer. Thus the voice CLEC must issue an LSR,

the data CLEC must issue an LSR, and one of the CLECs (depending on the routing of the loop between the two) must issue an ASR. Manual processing will be required for all three ordering documents. Such a manual and restrictive process creates operational and economic barriers to providing DSL services to mass market customers. BellSouth's proposed policies and practices for this service are designed to complicate and hinder the provision of line splitting service to CLEC customers and should be rejected by this Commission. TRO at ¶ 514.

Q. ON PAGE 2 OF HIS TESTIMONY, MR. AINSWORTH APPEARS TO INDICATE THAT THE PURPOSE OF THE BATCH PROCESS IS TO CONVERT THE EMBEDDED BASE OF UNE-P TO UNE-L ARRANGEMENTS. DO YOU AGREE?

A. No. As I described in my direct testimony, AT&T has attempted to obtain a suitable bulk process from BellSouth to address customer service and cost issues, even with the availability of unbundled switching. Further, the TRO is replete with instances citing the need for a batch hot cut process. For example, in ¶ 487 the FCC found "that a seamless, low cost batch cut process or switching mass market customers from one carrier to another ***is necessary, at a minimum***, for carriers to compete effectively in the mass market." I am unaware of any portion of the TRO that directs the establishment of a batch hot cut process simply for the use of migrating the embedded base of UNE-P. Indeed, given the FCC's findings that the hot cut process creates operational and economic impairment, and that "[***a***]***fter*** a batch cut process has been put into place, we expect state commissions in ***subsequent*** reviews to reevaluate the circumstances surrounding self

provisioning [of local switches]," it is clear that the FCC contemplated the continuing use of batch hot cut process.[5] TRO at ¶ 502 (emphasis added).

Q. WHAT ARE YOUR CONCERNS REGARDING VERIZON'S BATCH PROPOSAL?

A. As an initial matter, I strongly disagree that Verizon is not obligated to provide a batch process. (See Verizon Panel Testimony at page 36). Contrary to its assertion, Verizon does not demonstrate in Part III of its testimony (which is comprised only of an explanation of how it developed its exorbitant hot cut costs) that it has satisfied its obligations regarding individual hot cuts. Verizon did not provide the Commission with any evidence that its existing hot cut process does not produce operational and economic impairment.

Secondly, as I described earlier in my testimony, Verizon has offered such a flawed batch process that AT&T would not consider exposing its customers to it.

B. BellSouth and Verizon Have Not Demonstrated that they Could Perform Hot Cuts at the Volumes that Will Be Required if Unbundled Local Switching Is Not Available for Mass Market Customers.

Q. WHAT DID THE FCC FIND REGARDING THE ILEC'S ABILITY TO HANDLE THE INCREASED VOLUME OF HOT CUTS THAT WOULD BE EXPECTED IN THE ABSENCE OF UNBUNDLED SWITCHING?

A. The FCC noted that "While incumbent LECs state that they have the capacity to meet any reasonable foreseeable increase in demand for stand-alone loops that

[5] As I indicated in my direct testimony, AT&T supports the voluntary use of a batch provisioning process for its use to migrate customers from UNE-P to UNE-L when it is otherwise feasible to do so.

might result from increased competitive LEC reliance on self-provisioned switching, **there is little other evidence in the record to show that the incumbent LECs could efficiently and seamlessly perform hot cuts on a going-forward basis** for competitors who submit large volumes of orders to switch residential subscribers." TRO at n. 1437(emphasis added). The FCC also found "incumbent LECs' **promises** of future hot cut performance **insufficient** to support a Commission finding that the hot cut process does not impair the ability of a requesting carrier to provide the service it seeks to offer without at least some sort of unbundled circuit switching." *Id.* (emphasis added).

Q. HAS BELLSOUTH PROVIDED ANYTHING OTHER THAN PROMISES OF PERFORMANCE IN THIS PROCEEDING?

A. No. While BellSouth made some assumptions about volume and used this information in a force model, the net result is that they intend to "throw bodies" at the problem. They provided no plans regarding quality improvement and automation, hallmarks of progressive management throughout industry, indicating instead their intention to attempt to custom design and manually implement mass market services, and pass the unnecessary and prohibitive costs on to CLECs.

Further, BellSouth provided no results of independent analysis and testing of this proposal. As I indicated in my direct testimony, BellSouth should be not be permitted to rely on promises, but should required to prove it has the systemic capability to handle the provisioning of hot cuts at volumes anticipated across all its markets in the absence of unbundled local switching. Therefore, once designed, the batch cut process must be subject to both pre-implementation and

post implementation testing. Pre-implementation testing should include third party "time and motion" study of the hot cut process, and third party-monitored ILEC testing using its own collocation and migration of significant numbers of its own customers through hot cuts from direct connection to its switch to its collocation equipment installed to operate as a pseudo-CLEC specifically for this test. Post-implementation "testing" would include continuing commission review to determine if the batch hot cut process meets the needs of commercial mass markets in a manner that permits effective and efficient competition.[6]

Q. ON PAGE 18 OF HIS TESTIMONY, MR. AINSWORTH ASSERTS THAT BELLSOUTH'S CUTOVER OF OVER 200 LINES IN A SINGLE CENTRAL OFFICE IN ONE DAY DEMONTRATES BELLSOUTH'S ABILITY TO PERFORM HOT CUTS AT FORESEEABLE VOLUMES. DO YOU AGREE?

A. No. First, Mr. Ainsworth's testimony provides no information regarding the quality of the work performed or the experience of the customers who lines were cut over. It does not indicate whether these lines included IDLC, and if so how those approximately 72 dispatches, each taking approximately one hour, were handled. Additionally, this single event, which may have been achieved with days of pre-work, around-the-clock scheduling, and other extraordinary means, is no indication that the same volume work could be performed in that or any central office on a day-in and day-out basis.

[6] According to Mr. Ruscilli, only 82 lines have been converted using the batch process (See Rebuttal Exhibit MDV-R3)

Q. YOU MENTIONED THAT BELLSOUTH MADE A FORECAST OF HOT CUT VOLUMES AND USED THAT INFORMATION IN A FORCE PLANNING MODEL. DO YOU HAVE ANY OTHER CONCERNS REGARDING THIS APPROACH?

A. Yes, I have several concerns about the forecast process used by Messrs. Ainsworth and Heartley and the subsequent modeling outcomes. In BellSouth's response to AT&T's Document Request No. 42, it stated that **BEGIN CONFIDENTIAL ** ** END CONFIDENTIAL** daily UNE-P to UNE-L conversions per day were forecast in Florida.[7] This falls well short **BEGIN CONFIDENTIAL ** ** END CONFIDENTIAL** of the 5,635 I recommended in my direct testimony. BellSouth's forecast is based on current levels of competition, while AT&T recommended that a truly competitive market, long distance, be used as a model. BellSouth's restrictive view of the volumes to be implemented in Florida will become a self-fulfilling prophecy due to the lack of man-power available if manual hot cuts are required.

Second, BellSouth assumes that in 50% of the hot cuts will be non-coordinated, despite the fact that from September 2002 through August 2003 less than 3% of the total hot cut conversions were non-coordinated.[8] BellSouth provides no explanation for this dramatic change. This is a critical issue as it takes 28% less central office work time to perform a non-coordinated cut than a coordinated one. Therefore, underestimating the number of cutovers that will require coordination will result in significant understaffing.

[7] Despite the heading of "Daily UNE-P to UNE-L Conversions" in the force model, it appears that new loop migrations is included in the model and not just UNE-P to UNE-L conversions. If my assumption is incorrect, then staffing needs are under forecast.

Third, BellSouth's model assumes that there will be uniform distribution of hot cuts to transfer the entire embedded base to UNE-L. For example, for each of the three seven month periods during which BellSouth forecasts that one third of the embedded base of UNE-Ps will be migrated to UNE-L, it assumes that an equal amount will occur each month.[9] BellSouth fails to take into account that in many central offices the CLECs are not going to have the collocated facilities and network equipment in place to support the migration of the embedded base of UNE-P customers over to the CLECs' facilities. In fact, in many instances CLECs will not even have a collocation arrangement in place to support these migrations.[10] Before these CLECs can issue their conversion orders, they will need to establish new collocation facilities and/or augment existing arrangements. The CLECs ability to do this to meet the balanced schedule that BellSouth assumed will be gated by a number of factors outside of the CLECs' control. These factors include: a CLEC's ability to raise the capital it will need for these facilities; BellSouth's ability to manage and keep up with the collocation demand; the ability of BellSouth's approved vendors to establish the required collocation arrangements; and the CLEC's equipment manufacturer's ability to deliver and install the equipment in the CLEC's new or expanded collocated space. The CLECs cannot begin to negotiate a conversion schedule with BellSouth until the CLECs have sufficient facilities to support the imbedded base of their UNE-P

[8] In a non-coordinated cut, CLECs do not receive, for example, pre-due date verification and coordination and pre and post cut coordination on the due date.
[9] See Exhibit KLA-3 of BellSouth Witness Ainsworth.
[10] To compound the problem, many CLECs are currently UNE-P only providers. Unless a finding of non-impairment is intended to drive these CLECs out of business, the schedule must account for the time it will take these CLECs to get the funding they will need to purchase and install their network facilities (circuit switch, SS7 signaling capabilities, database access, collocated facilities, etc.).

customers. Because of the time it will take to establish these collocation arrangements and install the necessary facilities, the conversions in the central offices associated with these collocation augments may well need to be "back-loaded" at the end of the schedule. BellSouth's force model and its estimate on how many additional staff members it will need for all aspects of the hot cut process is based on BellSouth's assumed even distribution of the embedded base conversion. Having more of the conversions back-loaded at the end of the 27 month period specified by the FCC will result in an understatement of BellSouth's actual staffing needs.

Further it is unclear if and how BellSouth accounted in its forecast for the following:

- Whether any analysis demonstrated there was sufficient physical capacity at the central office to perform the forecasted volumes;
- Travel time to unmanned central offices;
- Number of shifts worked per day per central office;
- If all lines after the first one in the batch are considered as additional lines for purposes of staffing and charges, or if only additional lines for the individual end-users were considered;
- Whether the ratio of supervision to employees was applied evenly across BellSouth territory or accounted for the geographic dispersion of the central offices; and

- The impact of the shift in traffic off of its current local switch-to-local switch network and onto the tandem transport network.

All of these issues have a direct bearing on the effectiveness of the model, and its usefulness as a tool in managing the number of loop migrations required in the absence of unbundled local switching as a UNE. Clearly the model's result must be viewed with skepticism given these inadequacies.

Q. DO YOU HAVE OTHER CONCERNS REGARDING BELLSOUTH'S FORCE MODEL?

A. Yes. While BellSouth's model churns out numbers of personnel "required," the Commission can gain no assurance from BellSouth's testimony that the work necessary could indeed be conducted in the central office. In certain instances, insufficient information is offered; in others, inconsistent information is provided. For example, Mr. Heartly's testimony on page 13 offered only general assurances that central office limitations could be managed, and his supporting examples cannot withstand scrutiny. First, he says that from 2 to 10 (or more) technicians can work simultaneously on the same Main Distribution Frame ("MDF") without negative impact on productivity. He provides no analysis of how often two technicians at most can work simultaneously on BellSouth's MDFs throughout the state versus ten technicians. Second, he says that when multiple loop conversions are scheduled in a single day for a single central office, the pre-wiring work can be done over several shifts in the days leading up to the due date. However, this position does not account for the likelihood that multiple loop conversions would need to occur **every** day in an environment that eliminated

switching as a UNE. In fact, Mr. Heartley's own force model calls for multiple conversions in a central office on a **daily** basis (See BellSouth Exhibit AH-1). Thus, pre-wiring work for one set of migrations to UNE-L would have to occur on the same day as the actual cutovers for another set of migrations to UNE-L. Both sets of activities would occur on the same day on the same MDF.

In addition to the lack of specific information in Mr. Heartley's testimony regarding the space limitations existing in central office, other information provided by BellSouth calls into question the non-specific information in Mr. Heartley's testimony. For example, BellSouth responded to AT&T Interrogatory No. 44 (See Rebuttal Exhibit MDV-R4) that it assumed that 12 technicians could work simultaneously on the frames of certain central offices. Many of those same central offices are also included in Mr. Heartley's Exhibit AH-1 and BellSouth's response to Interrogatory No. 45 (See Rebuttal Exhibit MDV-R5), in which a much smaller number of technicians is reported. The discrepancies are reported in the following table.

Central Office BellSouth Exhibit AH-1	Maximum simultaneous technicians Interrogatory-44	Maximum simultaneous technicians Interrogatory-45
hlwdflpe	12	8
miamflhl	12	8
hlwdflwh	12	8
prrnflma	12	10
pmbhflcs	12	8
wpbhflga	12	8
miamflca	12	10
ftldfloa	12	10
pmbhflma	12	8
ndadflbr	12	8

Additionally, in its response to AT&T Interrogatory No. 44, BellSouth reports the conversions for central office HLWDFLPE to be 156 UNE-P to UNE-L conversions per day, assuming the constant use of two shifts, and performing some third-shift work. However, BellSouth reports in its Response to AT&T Request for Production No. 42 it will now inexplicably be capable of performing **BEGIN CONFIDENTIAL** ** ** **END CONFIDENTIAL** (a 25% increase) UNE-P to UNE-L conversions per day in that central office. This commission is asked to believe that this significant increase in the number of UNE-P to UNE-L conversions that could be performed occurs despite the fact that the number of technicians capable of working simultaneously has been revised downward (from 12 to 8 for a 33% decrease), and the number of conversions per technician per shift remains at approximately 12.[11] In sum, BellSouth does not provide specific analysis that illustrates that its central offices have physical capacity; in fact, the data provided suggests the availability of adequate capacity is anything but clear due to the conflicting or irreconcilable conclusions in the information provided.

Q. DO YOU HAVE CONCERNS REGARDING VERIZON'S FORCE MODEL AND ITS OUTPUTS?

A. Yes. As an initial matter, it suffers from the same deficiency I noted earlier in BellSouth's approach. It assumes a relatively even distribution of embedded base migrations despite the practical realities that because of the time it will take to

[11] For example, a according to BellSouth's force model a non-designed coordinated cut takes 36 minutes. Thus, a technician could perform 11.66 cuts during a seven hour shift. (Seven hours is extremely aggressive, but assumes two 15 minute breaks and a total of 30 minutes for health breaks and other non cutover-activity.) (See also Bellsouth response to Interrogatory No. 44 attached as Rebuttal Exhibit MDV-R4).

establish collocation arrangements and install the necessary facilities, so that the conversions in the central offices associated with these collocation augments may well need to be "back-loaded" at the end of the schedule. This would result in an understatement of Verizon's actual staffing needs.

Further, it is unclear whether the force model appropriately used the forecasted number of hot cuts required in a scenario where UNE-P is unavailable ("the incremental UNE-L adds").

Q. DO YOU HAVE OTHER CONCERNS WITH VERIZON'S CAPABILITY TO PERFORM THE ADDITIONAL MANUAL ACTIVITY IN ITS CENTRAL OFFICES CAUSED BY THE ELIMINATION OF SWITCING AS A UNE?

A. Yes. For example, in response to a question on page 66 of Verizon's Panel Testimony regarding whether the additional work force will lead to crowding that could interfere with normal work at the frame, Verizon responds,"The necessary additional hiring would merely bring the level of frame activity closer to staffing levels prevailing in earlier years, at which crowding was not a problem."

It is not clear what "earlier years" Verizon is talking about it its response to this question. One must keep in mind that the greater than **BEGIN CONFIDENTIAL **** **** END CONFIDENTIAL** monthly hot cuts that Verizon stated it must perform are in addition to current hot cut volumes and all of the "normal" frame work that Verizon's staff must perform each month. This other frame work includes the normal day-to-day activity necessary to run the business such as: new retail and wholesale customer service installations, installation of additional lines to an existing customer, full or partial disconnects

of customer service and troubleshooting of customer service problems. It is inconceivable that the people being added to Verizon's staff do this additional work, ***which is work that was never performed before in the history of the telecommunications industry***, can bring "the frame activity closer to staffing levels prevailing in earlier years" as Verizon claims.

IV. BELLSOUTH AND VERIZON HAVE NOT SHOWN THEY CAN IMPLEMENT A LOW COST BATCH PROVISIONING PROCESS

Q. WHAT DID THE FCC CONCLUDE ABOUT THE COSTS OF HOT CUTS?

A. The FCC stated that the "record evidence indicates that the non-recurring costs associated with cutting over large volumes of loops would likely be prohibitively expensive for a competitive carrier seeking to provide service without the use of unbundled local circuit switching. TRO at ¶ 470. The FCC then found that a seamless, ***low-cost*** batch cut process switching mass market customers from one carrier to another is necessary, at a minimum, for carriers to compete effectively in the market. TRO at ¶ 487 (emphasis added). This batch cut process must "render the hot cut process more efficient and reduce per-line hot cut costs." RO at ¶ 460.

Q. HAS BELLSOUTH PROVIDED THIS COMMISSION A COST STUDY DEMONSTATING THAT ITS BATCH ORDERING PROCESS IS MORE EFFICIENT, THEREBY REDUCING HOT CUT COSTS?

A. No. In fact, BellSouth's rates for its batch process are very high. They are the same as the rates for individual cuts. Mr. Ruscilli, in response to AT&T

Interrogatory No. 130, indicated that the results of the cost study reflected that the efficiencies that may be realized as a result of performing the hot cuts were offset by the cost of the project management. In other words, BellSouth offers nothing to satisfy the FCC's direction that the process be "low-cost."

Q. DIDN'T BELLSOUTH OFFER A 10% DISCOUNT OFF HOT CUT RATES FOR HOT CUTS ORDERED IN BATCHES?

A. Yes. However, I have a number of concerns with BellSouth's proposal. First, it is inadequate to eliminate the high costs of a hot cut. As I indicated in my direct testimony, the most utilized hot cut is $83.11, compared to a UNE-P migration cost of $1.62. A reduction of $8.31 makes very little progress in closing that gap. And, although Mr. Ruscilli alludes on page 18 of his Direct Testimony to a cost study (including the fact that certain rate elements in this study are actually lower than the ordered rate including the 10% discount), BellSouth has not filed a study in this case.

Q. IF ITS OWN UNCONTESTED COST STUDIES SHOWED THAT THE NEW RATES WERE IN SOME CASES BELOW A 10% REDUCTION IN THE CURRENT RATES, WHAT ANALYSIS DID BELLSOUTH USE TO ESTABLISH A REDUCTION RATE OF 10%?

A. It is unclear. In response to AT&T Request for Production of Documents No. 40, which asked for all supporting documentation for the 10% discount, BellSouth responded that it had no responsive documents. (See Rebuttal Exhibit MDV-R6).

Q. GIVEN BELLSOUTH'S OFFERED DISCOUNT, IS THE COST TO THE CLECS FOR USING THE BATCH ORDERING PROCESS SUBSTANTIAL?

A. Yes. Because the hot cut process is manual, large numbers of personnel will be required. The salary and benefits of the additional LCSC and CWINS personnel required will be over $40,000,000 dollars annually, and the salary, benefits, and tools for the additional central office and field personnel will be over $58,000,000 dollars annually. (See Rebuttal Exhibit MDV-R7) This does not include training costs, real estate, etc. for these employees. This significant extra annual cost (likely well over $100,000,000) by BellSouth will of course be passed on to CLECs, who will pay these extra charges ***for no additional value*** to the consumers in Florida.

Importantly, these extra BellSouth personnel costs do not include other costs such as the CLECs' internal costs for its own personnel, as well as the network infrastructure required to be able to provide its own switching.

Q. HAS VERIZON OFFERED A COST STUDY IN THIS PROCEEDING?

A. Yes. The rates proposed by Verizon minimally reflect inadequate processes and likely reflect costing methodologies that are not TELRIC based. In any event, the rates proposed on page four of Exhibit III-A of Verizon's Panel Testimony are not the low cost rates required by the FCC in the TRO and required by CLECs to be able to operate in the mass market.

Q. WHAT DO YOU RECOMMEND THE COMMISSION DO REGARDING THE ESTABLISHMENT OF TELRIC PRICING FOR BATCH PROCESSES FOR VERIZON AND BELLSOUTH?

A. First, the Commission should establish appropriate batch processes based on AT&T's recommendation described in my direct testimony. Once processes are

defined and BellSouth and Verizon implement the Commission's Order, then TELRIC rates should be established. Until those rates are established, rates for UNE-P migrations should be charged for loop migrations when using the Commission approved batch process.

V. BELLSOUTH'S AND VERIZON'S TESTIMONY DOES NOT ADEQUATELY ADDRESS THE NEW OPERATIONAL ISSUES THAT WILL ARISE IF LOCAL SWITCHING IS NO LONGER AVAILABLE TO CLECS AS A UNE.

Q. ON PAGE 24 OF HIS TESTIMONY, MR. RUSCILLI ASSERTS THAT TRANSITIONAL USE OF UNBUNDLING OF LOCAL SWITCHING IS NOT NEEDED BECAUSE CLECS ARE NOT IMPAIRED. DO YOU AGREE?

A. No. The FCC directed state commissions to consider whether (or the extent to which) temporary or "rolling access" to UNE-P would address all identified impairment. TRO ¶ 524. Rolling or transitional access to UNE-P is clearly not adequate to "cure" the many operational and economic issues for the reasons described in this and other AT&T testimony. For example, rolling access would not alleviate service outages caused by hot cuts; it would not resolve the economic impairment that results from the collocation, digitization, concentration and backhaul costs that a CLEC must incur to connect the ILEC loop to its switch; it would not correct the inefficiencies and errors created by the manual hot cut provisioning; and it would not overcome the capacity constraints which are created by the volumes of hot cuts required and exacerbated by scenarios such as IDLC, line splitting and CLEC-to-CLEC migrations. Moreover, we have not yet

seen what additional operational concerns will arise if unbundled local switching is no longer available to CLECs.

Q. PLEASE REMIND THE COMMISSION WHAT ADDITIONAL OPERATIONAL CONCERNS YOU BELIEVE MAY OCCUR IF LOCAL SWITCHING IS NO LONGER AVAILABLE TO CLECS.

A. The two specific issues I addressed in my direct testimony were collocation space and trunk blocking. It is likely we will see impacts in both of those areas if unbundled local switching is no longer available to CLECs at cost-based rates. More collocation space will be needed and traffic patterns within the network will change such that more local traffic will be routed to the ILEC's tandem switch.

Q. ON PAGES 19-21 OF HIS TESTIMONY, MR. RUSCILLI STATES THAT COLLOCATION SPACE IS AVAILABLE AND THAT BELLSOUTH PROVIDES COLLOCATION IN A TIMELY MANNER. PLEASE COMMENT.

A. Conspicuous for its absence is any discussion of the plans that BellSouth has made to handle the surge of applications for new collocation arrangements and augmentations of existing collocations, not to mention the need to plan and construct necessary additions to its central office back-up power plants. BellSouth's testimony also does not account for the additional staffing it will likely need to support the surge in collocation requests it may receive. And, while BellSouth claims it has space available in most locations, it does not say how much, so the Commission has no information to understand how many additional CLECs BellSouth's central offices can accommodate.[12]

[12]The FCC identified available collocation space as an issue for the state TRO proceedings. TRO ¶ 513. "We find that the absence of sufficient collocation space in the incumbent central office or offices might in

Like its performance in other areas, BellSouth's performance results in providing collocation space in today's environment, when there is little to no activity, has little relevance in an environment much more dependent on timely collocation installations. Yet BellSouth has provided no details on how it plans to manage increased demand for collocation or what it estimates that demand to be. Without an ability to efficiently provide increased amounts of collocation in a timely manner, BellSouth's theoretical ability to perform hot cuts to non-existent collocation arrangements, even if true, becomes beside the point.

Q. HOW DID VERIZON ADDRESS THIS ISSUE?

A. Verizon's Panel fails to address at all Verizon's capability to support the additional requirements that would be placed on its collocation application and implementation processes that a non-UNE-P environment would create.

Q. EARLIER YOU EXPRESSED CONCERN ABOUT THE IMPACT OF THE SHIFT IN TRAFFIC OFF OF BELLSOUTH'S CURRENT LOCAL SWITCH-TO-LOCAL SWITCH NETWORK AND ONTO THE TANDEM TRANSPORT NETWORK. PLEASE EXPLAIN WHAT YOU MEAN BY THIS SHIFT IN TRAFFIC.

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some markets render competitive entry impossible and thus result in impairment. We therefore direct the state commissions to consider evidence concerning the costs and physical constraints associated with collocation in a particular market. We direct state commissions to consider whether competitive entry is inhibited, or is likely to be inhibited going forward, by the exhaustion of available collocation space in the incumbent LEC's central offices. Evidence relevant to this inquiry would include, for example, the amount of space currently available in those central offices; the expected growth or decline, if any, in the amount of space available; and the expected growth or decline, if any, of requesting carriers' collocation space needs, assuming that access to unbundled switching were curtailed. The state commissions shall consider this factor in determining whether to find that requesting carriers are not impaired without access to unbundled local circuit switching."

A. When a CLEC is using UNE-P it not only uses BellSouth's unbundled switching but it also uses BellSouth's unbundled common transport.[13] Because of the traffic volumes and the community of interest between local switches that BellSouth has as a result of its former monopoly status, much of the retail and UNE-P inter-switch traffic is routed on direct trunk groups from the originating end office local switch to the terminating end office local switch. However, because the CLECs do not enjoy the same economies of scale as BellSouth does, most of the traffic from the CLEC's local switches will have to be routed through BellSouth's tandem switches for completion to the BellSouth end offices. Additionally, traffic originated by BellSouth customers will need to be routed through its tandem switches for completion to the CLEC's local switches when a BellSouth customer is calling a CLEC customer.

As a result of the conversion of the embedded base of UNE-P customers to the CLEC's switches there is going to be a tremendous shift in traffic volumes off of the existing BellSouth end office–to-end office trunk groups and onto the BellSouth tandem switches and the trunk groups between the tandem switches and the BellSouth end offices. Unless BellSouth has properly engineered for this growth in volumes on its tandem network, CLECs and their customers are going to experience tandem congestion and the resulting call blocking.

Q. BECAUSE BELLSOUTH WILL NEED TO USE ITS TANDEM NETWORK TO COMPLETE ITS CUSTOMER'S CALLS TO THE CLECs, WON'T THIS PROBLEM ALSO BE A CONCERN FOR THEM?

[13] Common transport is also known as shared transport.

A. Not necessarily. It is important to keep in mind that the customer being migrated was already CLEC customer and may have been a CLEC customer for a considerable amount of time. Because of the service outage and feature functionality issues associated with a hot cut over to the CLECs facilities, the CLECs are required to notify all of their UNE-P customers of the conversion to UNE-L. This is typically accomplished via a letter to the customers informing them of a "network upgrade" that will result in a brief (we hope) outage and will potentially impact some of their feature functionality.[14] After this "network upgrade" is accomplished the customer, who never had a problem completing or receiving calls before the "upgrade" and now experience these problems, will assume that the CLEC dropped the ball on its "upgrade." Even in cases where the BellSouth's customer gets blocked it is generally going to be a negative reflection on the CLEC because people trying to call the CLEC's customer did not have a problem with call blocking prior to the "upgrade." Unless BellSouth has planned for and engineered its network for this major shift in traffic patterns, CLEC customer service will be severely impacted and as a result the CLECs will lose customers back to BellSouth.

Q SHOULD BELLSOUTH BEGIN TO ENCOUNTER THIS CONGESTION ON ITS TANDEM NETWORK CAN'T IT EASILY BE REMEDIED BY THE ADDITION OF TRUNKS BETWEEN THE TANDEMS AND THE END OFFICES?

[14] Some switch based features such as speed calling and remote call forwarding will have to be reprogrammed by the customer when the customer is converted from UNE-P to the CLEC's switch.

A. If it is a simple matter of increasing the trunk group size and the spare facilities are available to do so, then it is a relatively easy problem to fix. However, the problem is not all that simple. First, BellSouth must determine whether its tandem switches can handle the increased traffic load that they will be faced with. If not, either the tandem switch will have to be augmented through an addition of equipment and supporting software. In cases where BellSouth's tandems are already performing at or near capacity then additional tandem switches may need to be installed in the network. In either case both scenarios will take a considerable amount of time, during which the CLEC's customers are continuing to experience service problems. Additionally, there may be cases where the tandem has the capacity but there are no spare facilities between the tandem and the end offices to grow the existing trunk groups for the additional traffic load. This scenario will also take time for BellSouth to install the interoffice facilities it will need to support the offered traffic loads, all resulting in the same detrimental impact to the CLEC's customers.

Q. HOW DID VERIZON ADDRESS THIS ISSUE?

A. It did not. Further, the concerns I expressed above about BellSouth also apply to Verizon.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

Subject: FW: BellSouth Response to Question re: Bulk Migration Collaborative

-----Original Message-----
From: Change Control [mailto:Change.Control@BELLSOUTH.COM]
Sent: Thursday, November 20, 2003 2:21 PM
To: 80ta; a lee; a vincent; adsl technician; Alan Flanigan; alejandro; Amanda Hill; Annette Cook; Annette Hardy; asanjuan; B Murdo; B Shafer; B Stewart; B Swager; Becky Gorman; Bette Smith; Beverly Posey; Bill Czolba; Bill Gaboriski; Bill Grant; Bill York; Bob Buerrosse; Brenda Gant; Brian Feller; BSNotes; BSTCarrier; C & M; C Ashford; C Cassel; C Chiavatti; C Flanigan; C Larson; C Miller; C Smallwood; C Soptic; Caren Schaffner; Carol Asenjo; Catherine Gray; Cedric Cox; Change Control; Cheryl Acosta; Cheryl Haynes; Iacovelli,Christopher D (Chris) - ALABS; Christy Markley; Cindy Schneider; Colette Davis; Colleen Sponseller; Connie Nathan; Craig Davis; Burt,Diane P - ALABS; D Feinberg; D Kane; D Mitchell; D Nathanson; D Parobeck; D Petry; Daddy Max; Dale Donaldson; Darrin McClary; Townsend,David (Dave) - ALABS; David Burley; David Lee; DDL; Berger,Denise C - NKLAM; Desiree; Don; Donna Poe; E Goldberg; E Singleton; Ed; Elliott Wrann; Erick Melgarejo; Eyu; Gary; Ggotimer; H Carlton; Hawn Nguyen; Heather Thompson; J Britton; J David; J Johnson; J Mclau; J Nugent; J Oliver; J Perry; J T Wilson; J Wilwerding; Jake Hayes; James Childress; Janice Johnson; jason Bahr; Jason Lee; Bradbury,Jay M - LGCRP; jean Cherubin; Jeff Walker; Jennifer S; Jerry; Jerry Hill; JG6837; Joanne Baxter; John Boshier; John Duffey; John Fury; Jureidini,Jordana M - NKLAM; K Branch; K Pollard; K Turner; Karen Grim; Kraig Nielsen; Kyle Kopytchak; L Hopkins; L Looney; L Mitchell; L Ortega; Lacy Hamlin; Launch Now; Leon Bowles; Linda Minasola; Louis Toyama; Lorna Richards; Lorraine Watson; Louise Wilds; M Boner; M Connolly; M Dossey; M Mathews; Margaret Ring; Aquino,Maria D - ALABS; Mark; Mark Ozanick; Mary Conquest; Maya Mistry; Mel Wagner; Mer; Michael Britt; Michael Dekorte; Micki Jones; Midge Houghtaling; Mike Young; Mnoshay; Morgan Halliday; N Dreier; Nancy Thompson; Natalie Franklin; Neustar; Nicole Crauwels; Notifications (Ernest Group); One Point; OSS; P Barker; P Kinghorn; P McKay; P Pinick; Patricia D; Peggy Rehm; Peggy Rubino; Phil Nixon; Cole,Peter M (Pete) - ALABS; R Bennett; R Breckin; R Cairnes; R Harsila; R Maimon; R Munn; R Wilson; Rae Couvillion; Rebecca Baldwin; Regina McDay; Rick Williams; Robert; Robert Scordato; Ron Johnson; Ross Martin; Rubye; S Cogburn; S Sarem; Sandra Hendricks; Sandra Kahl; Schula Hobbs; Scott Emener; Scott Harper; Scottme; Sharon Eleazer; Sherry Lichtenberg; Steve Brown; Steve Moore; Steve Taff; Susan Sherfey; T Aziz; T Barton; T Carter; T Fry; T Norvell; T Wimmerstedt; TagTeam; Tim; Todd; Todd Sorice; Tom Hyde; Toni; Tonyam; TS1336; Tyra Hush; W Fletcher; Walter Carnes; Wendy Hernandez
Subject: BellSouth Response to Question re: Bulk Migration Collaborative

CLECs,

In response to the question from Benni Almas (Neustar) regarding BellSouth's plans
to establish a Bulk Migration collaborative with the CLEC community:

BellSouth has an effective, seamless Bulk Migration process in place. Consequently,
BellSouth has no plans to establish a Bulk Migration collaborative at this time.

If this changes in the future, CCP will forward the invitation to the CLEC community.

Thanks,

Change Management Team

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BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF W. KEITH MILNER

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. P-55, SUB 1022

APRIL 12, 2001

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

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present position since February 1996.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 30 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international arenas.

I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina, in 1970, with an Associate of Applied Science in Business Administration degree. I later

Q. ARE CLPS ORDERING LINE SPLITTING?

A. No, not at this time. As stated above, however, BellSouth will facilitate line splitting for any CLP that requests it.

HOT CUTS

Q. GENERALLY DESCRIBE THE PROCESS KNOWN AS A "HOT CUT."

A. Hot cuts involve the conversion of an existing BellSouth customer to the network of a competitor by transferring the customer's in-service loop over to the CLP's network. BellSouth has established hot cut procedures that ensure accurate, reliable, and timely cutovers.

Q. DESCRIBE THE LOOP CUTOVER PROCEDURES ESTABLISHED BY BELLSOUTH TO ENSURE ACCURATE AND TIMELY CUTOVERS.

A. BellSouth has implemented three hot cut processes, two involving coordination at the time of the hot cut between BellSouth and the requesting CLP and one process that does not involve such coordination. The two processes for coordinated loop cutovers are a time-specific cutover, and a non-time-specific cutover. With a time-specific cutover, a CLP can set a specific date and time for a loop conversion by ordering and paying for time specific order coordination. Under this option, BellSouth commits to use best efforts to complete the conversion as specified by the CLP at the ordered date and time. *See* ICG Agmnt., Att. 2, § 2.1.4. If unforeseen circumstances occur during the

provisioning process which may cause the date or time of the conversion to be in jeopardy, BellSouth notifies CLP as soon as the jeopardy is identified to allow the CLP to respond to its customer as appropriate.

Under the second option, the CLP may request non-time specific coordination from BellSouth. Under this option, BellSouth and a CLP mutually establish a date for the conversion but do not pick a specific conversion time at the time BellSouth receives the CLP's local service request. Then, 24 to 48 hours in advance of the date of the conversion BellSouth and the CLP mutually set a time for the conversion. Like time-specific coordination, if unforeseen circumstances occur that may jeopardize BellSouth's ability to perform the conversion, BellSouth notifies the CLP as soon as the jeopardy is identified.

As a third option, the CLP may prefer no coordination of any kind between BellSouth and the CLP at the time of the hot cut. The CLP merely specifies the date upon which it wishes BellSouth to perform its cutover activities and BellSouth notifies the CLP once the hot cut is complete.

Q. DESCRIBE IN MORE DETAIL THE PROCESS FOR COORDINATED CUTOVERS.

A. Coordinated loop cutovers involve a number of steps. Exhibit WKM-2 shows, pictorially and with a brief narrative, the various work steps involved in a typical coordinated loop cutover. These photographs were taken in BellSouth's Norcross, Georgia, central office; however, the work steps are identical in all nine states in BellSouth's region. Briefly, the work steps involved are as follows:

- The BellSouth central office technician receives a call to begin cutover and asks for the cable pair number of the loop to be cutover. This is shown on page 1 of Exhibit WKM-2.
- The technician types the cable pair number into a database to find the loop cutover work order number. This is shown on page 2 of Exhibit WKM-2.
- The technician retrieves a copy of the work order for the unbundled loop. This is shown on page 3 of Exhibit WKM-2.
- The technician in the BellSouth central office responds to the BellSouth UNE Center's request to initiate coordination of the overall cutover of service from BellSouth to the CLP. This is shown on page 4 of Exhibit WKM-2.
- The technician then verifies that the correct loop has been identified for cutover. This is done using a capability referred to as Automatic Number Announcement Circuit ("ANAC"). The technician plugs a test set onto the loop and dials a special code. The telephone number associated with that loop is played audibly. This is shown on page 5 of Exhibit WKM-2.
- Next, the technician locates the existing jumper on the BellSouth Main Distributing Frame ("MDF") running between the loop and the BellSouth switch port. This is shown on pages 6-7 of Exhibit WKM-2.
- The technician locates and removes the end of the jumper connected to the BellSouth cable pair. This is shown on page 8 of Exhibit WKM-2.
- The technician then locates and removes the end of the jumper connected to the BellSouth switching equipment. This is shown on page 9 of Exhibit WKM-2.
- The technician then connects the one end of a new jumper between the loop and a connector block on a cable rack with tie cables to the CLP's collocation arrangement. This is shown on page 10 of Exhibit WKM-2.

- The technician then weaves the new jumper wire through the cable rack to reach the tie cables to the CLP's collocation arrangement. This is shown on page 11 of Exhibit WKM-2.
- The technician connects the second end of the new jumper to the connector block and thus the tie cable to the CLP's collocation equipment. This is shown on page 12 of Exhibit WKM-2.
- The technician next verifies that the loop is connected to the expected switch port and telephone number in the CLP's switch, again using ANAC capabilities. This is shown on page 13 of Exhibit WKM-2.
- Upon successful completion of the loop cutover, the technician verifies with the CLP that the order was correctly worked, closes the work order, and notifies the UNE Center. This is shown on page 14 of Exhibit WKM-2.
- Once the cutover is complete, the CLP sends appropriate messages to effect number porting.

Q. DOES BELLSOUTH DO ANY TESTING IN ADVANCE OF THE CUTOVER DATE?

A. Yes, BellSouth does advance testing for all designed circuits which come with test points. For such circuits, BellSouth will check the circuit 24 to 48 hours prior to the due date. For non-designed circuits, BellSouth performs continuity tests within the central office from the collocation to the BellSouth switch. For both designed and non-designed circuits, BellSouth tests on the cutover due date for CLP dialtone.

On the due date, BellSouth tests for CLP dialtone for all circuits, whether designed or nondesigned. BellSouth also monitors the line for use. If during the test, BellSouth does

not receive CLP dialtone, the cutover will not take place unless the CLP corrects the problem within 15 minutes or pays for standby time. Otherwise, the CLP must elect to reschedule the conversion.

Q. DOES BELLSOUTH PERFORM LOOP CUTOVERS SIMULTANEOUSLY WITH NUMBER PORTING?

A. No. BellSouth does not perform loop cutovers simultaneously with number porting for the very important reason that to do so leaves the end user customer at risk of the number porting being completed early and calls bound for the end user customer being misdirected to the CLP's switch. The loop cutover is much more complicated in terms of the work steps involved (on the part of both BellSouth and the CLP) than the number porting. BellSouth performs all "up front" work in anticipation of the loop cutover being successfully completed. BellSouth's provisioning process is discussed in the testimony of Mr. Ken Ainsworth. BellSouth's Local Number Portability ("LNP") process is discussed further in the affidavit of Mr. Dennis L. Davis, Attachment E..

The cutover process can be even more unobtrusive to the end user customer if one of several processes is followed. The CLP might, for example, schedule the cutover late at night or on a weekend or any other time when the end user customer will not be using the service. Other procedures such as pre-wiring cross connections in anticipation of BellSouth's providing the unbundled network elements likewise minimize or eliminate any inconvenience to the end user customer.

Q. DOES BELLSOUTH DOCUMENT ITS CUTOVER PROCESS SUCH THAT THE CLPS CAN REVIEW IT?

A. Yes. BellSouth has developed a detailed flow chart depicting the entire process. This process flow is attached to this testimony as Exhibit WKM-3.

Q. DOES BELLSOUTH HAVE METHODS AND PROCEDURES THAT DOCUMENT THIS PROCESS FLOW?

A. Yes. BellSouth has developed methods and procedures (M&Ps) for its process flow. BellSouth's M&Ps are attached to this testimony as Exhibit WKM-4 and address the following:

- BellSouth's processes when a CLP orders a coordinated conversion and whether the CLP wants to set the conversion time for an offered day or whether the CLP elects to have the time mutually agreed to prior to conversion.
- BellSouth's requirements to contact the CLP at any point in the provisioning process where a jeopardy condition might result in a conversion delay.
- BellSouth's commitment to contact the CLP 24 to 48 hours in advance of the cut depending on the interval for the service ordered, to negotiate a non time specific conversion and/or to verify the CLP's readiness to convert the customer's service as ordered.
- BellSouth's pre-testing responsibilities prior to conversion as well as on the conversion date to ensure the conversion is completed successfully.
- BellSouth's willingness to notify and cooperatively work with CLPs to correct any wiring defects which BellSouth identifies while performing pre-testing

REQUEST: Refer to the Direct Testimony of John Ruscilli, p. 13, lines 21-24, where he states: "As of October 2003, there are 156,745 lines in Florida served by a combination of a BellSouth unbundled loop and a CLEC's switch, which demonstrates without doubt that BellSouth has a hot cut process that has been tested and that worked." With regard to this testimony:

a. Explain what "testing" is referenced; and
b. How many of the 156,746 lines were hot cut under BellSouth's batch hot cut process?

RESPONSE: a. Mr. Ruscilli based his determination that the hot cut process had been tested upon the data demonstrating the large quantity of commercial usage of hot cuts in the state of Florida.

b. There have been a total of 82 lines requested and converted from UNE-P to UNE-L using the batch hot cut process.

RESPONSE PROVIDED BY: John Ruscilli

REQUEST: In BellSouth's Ex Parte in FCC Docket 01-338, filed December 24, 2002, on page 7, a table sets forth BellSouth's calculation of the time required to convert the "Top 20 UNE-P wire centers" to UNE-L or EELs. Provide answers to the following questions regarding that table:

(a) How many technicians were planned to work per shift, per wire center, to accomplish these conversions?
(b) How many conversions were planned per technician, per shift in each of the twenty wire centers?
(c) What is the maximum amount of new migrations BellSouth would be able to complete during the 3 –9 months these conversions would take place?
(d) How many UNE-P customers exist in these 20 wire centers as of September 1, 2003?

RESPONSE: (a) The assumption was that each of the Top 20 UNE-P wire centers, shown on page 7 of BellSouth's December 24, 2002, ex parte, have large frames and that there would typically be 6 technicians working on the frame during the normal day shift, with a maximum of 12 technicians able to work on the frame at any given time. Two shifts were assumed (except for the HLWDFLPE wire center where some third shift work was assumed) per day, with 6 technicians performing cuts during the day shift and 12 technicians performing cuts during the night shift, for an average of 9 technicians per wire center per day.

(b) The number of conversions per technician per shift in each of the twenty wire centers works out to be approximately 11.5, which results in approximately 104 conversions per wire center per day. In HLWDFLPE, assuming some third shift work, the number of conversions per technician per shift is approximately 13, which results in approximately 156 conversions per day.

(c) BellSouth's process is scalable depending on volumes.

RESPONSES (CONT.):

(d) See Attachment for response to Item No. 44(d).

RESPONSE PROVIDED BY: Lisa Brooks
Keith Milner

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
AT&T's 1st Interrogatories
October 6, 2003
Item No. 44 (d)

ATTACHMENT TO INTERROGATORY, ITEM NO. 44 (D)

Attachment
Response to Item No. 44 (d)

BellSouth's Top 20 UNE Impacted Wire Centers as of - 10/1/2003
WCs shaded are the Top Twenty Reported to FCC 12/23/2002

Rank	STATE	CLLI	Total UNE-P
1	FL	hlwdflpe	27662
2	FL	miamflhl	18049
3	FL	hlwdflwh	17955
4	GA	mrttgama	15599
5	FL	prrnflma	15038
6	GA	lrvlgaos	13118
7	FL	pmbhflcs	12014
8	FL	wpbhflga	11726
9	FL	miamflca	11704
10	FL	ftldfloa	11202
11	FL	pmbhflma	10631
12	FL	ndadflbr	10330
13	GA	jnbogama	9587
14	GA	smyrgama	9572
15	GA	wdstgacr	9551
16	FL	orldflph	9407
17	FL	ftldflpl	9406
18	GA	rswlgama	9292
19	GA	alprgama	9215
20	FL	miamflwd	9051
21	FL	ftldflja	9038
22	FL	ndadflac	8937
23	FL	bybhflma	8913
24	GA	gsvlgama	8862
25	GA	cmnggama	8842
26	GA	agstgafl	8415
27	FL	pmbhflfe	8269
28	FL	hlwdflma	8256
29	GA	llbngama	8088
30	FL	ftldflmr	8084
31	FL	ndadflgg	7939
32	GA	atlngaep	7849
33	GA	panlgama	7815
34	FL	miamflpl	7790

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
AT&T's 1st Interrogatories
October 6, 2003
Item No. 45

ATTACHMENT TO INTERROGATORY, ITEM NO. 45

Attachment
Response to Item No 45 (a)

	A	B	C	D	E	F	G	H	I	J	K
1	CLLI	PROPERTY NAME	ADDRESS	CITY	STATE	.ZIP	MANNED	HOST/REMOTE	HOST	# of Techs on Conv. Frame	# of Techs on Module Frame
2	ARCHFLMA	ARCHER CO	327 W ALABAMA ST	ARCHER	FL	32618	N	REMOTE	GSVLFLNW	2	
3	BCRTFLBT	Boca Teeca	5140 S Congress Av	BOCA RATON	FL	33487	Y	HOST		6	
4	BCRTFLMA	Boca Main	838 S Dixie Hwy	BOCA RATON	FL	33432	Y	HOST		10	
5	BCRTFLSA	Sandalfoot	9407 Glades Rd	BOCA RATON	FL	33433	Y	HOST		6	3
6	BGPIFLMA	Big Pine Key	US Hwy 1 MM 31	BIG PINE KEY	FL	33042	N	REMOTE	KYWSFLMA	2	
7	BKVLFLJF	BROOKSVILLE CO	201 E JEFFERSON ST	BROOKSVILLE	FL	34613	Y	HOST		6	
8	BLDWFLMA	BLDW MAIN CO	155 DREW ST	JACKSONVILLE	FL	32234	N	REMOTE	JCVLFLWC	2	
9	BLGLFLMA	Belle Glade	108 SW Av C	BELLE GLADE	FL	33430	N	HOST		6	
10	BNNLFLMA	BNNL IDLEWOOD CO	111 SOUTH CHERRY STREET	BUNNELL	FL	32110	N	REMOTE	PLCSFLMA	2	
11	BRSNFLMA	BRONSON	211 CAPITAL STREET	BRONSON	FL	32621	N	REMOTE	GSVLFLNW	2	
12	BYBHFLMA	Boynton Beach	221 SE 4th St	BOYNTON BEACH	FL	33435	Y	HOST		6	
13	CCBHFLAF	CAPE CANAVERAL	1734 CANAVERAL AIR FORCE	CAPE CANAVERAL	FL	32920	N	REMOTE	CCBHFLMA	2	
14	CCBHFLMA	COCOA BEACH	450 W CCBH CAUSEWAY	COCOA BCH	FL	32931	Y	HOST		4	
15	CDKYFLMA	CEDAR KEY	3RD STREET	CEDAR KEY	FL	32625	N	REMOTE	GSVLFLNW	2	
16	CFLDFLMA	CHIEFLAND CO	112 S.E. 1ST STREET	CHIEFLAND	FL	32626	Y	REMOTE	GSVLFLNW	2	
17	CHPLFLJA	CHIPLEY CO	689A 3RD ST.	CHIPLEY	FL	32428	Y	HOST		2	
18	CNTMFLLE	LEE CO	521 MUSCOGEE RD	CANTONEMENT	FL	32533	Y	HOST		2	
19	COCOFLMA	COCOA MAIN	712 FLORIDA AVENUE	COCOA	FL	32922	Y	HOST		8	
20	COCOFLME	MERRITT ISLAND CO	125 EAST MUSTANG WAY	MERRITT ISLAND	FL	32953	Y	HOST		8	
21	CSCYFLBA	CROSS CITY BARBER CO	410 SW 1ST ST	CROSS CITY	FL	32628	Y	REMOTE	GSVLFLNW	2	
22	DBRYFLDL	DELTONA CO	1204 PROVIDENCE BLVD	DELTONA	FL	32713	N	HOST		4	
23	DBRYFLMA	DEBARY	113 SOUTH HIGHWAY 17-92	DEBARY	FL	32713	N	REMOTE	DBRYFLDL	2	
24	DELDFLMA	DELAND	316 W NEW YORK AVE	DELAND	FL	32720	Y	HOST		6	
25	DLBHFLKP	Kings Point	6037 W Atlantic	DELRAY BEACH	FL	33445	Y	HOST		6	
26	DLBHFLMA	Delray Beach	321 SE 2nd St	DELRAY BEACH	FL	33483	Y	HOST		6	2
27	DLSPFLMA	DELEON SPRINGS	135 BERLIN STREET	DELEON SPGS	FL	32130	N	REMOTE	DELDFLMA	2	
28	DNLNFLWM	DUNNELLON CO	12060 S WILLIAMS ST	DUNNELLON	FL	34430	Y	REMOTE	WWSPFLHI	4	
29	DRBHFLMA	Deerfield Beach	780 S Deerfield Av	DEERFIELD	FL	33441	Y	HOST		10	
30	DYBHFLFN	FENTRESS CO	1861 MASON AV	DAYTONA BCH	FL	32014	N	REMOTE	DYBHFLPO	2	
31	DYBHFLMA	DAYTONA MAIN	268 N RIDGEWOOD AVE	DAYTONA BCH	FL	32114	Y	HOST		8	
32	DYBHFLOB	ORBH ORMOND BCH CO	22 S RIDGEWOOD AVE	ORMOND BCH	FL	32174	Y	HOST		8	
33	DYBHFLOS	OCEAN SHORES ESS	1776 N OCEANSHORE BLVD	ORMOND BCH	FL	32174	N	REMOTE	DYBHFLOB	2	
34	DYBHFLPO	DYBH PT ORANGE CO	829 ORANGE AVE	DAYTONA BCH	FL	32119	Y	HOST		6	

Attachment
Response to Item No 45 (a)

	A	B	C	D	E	F	G	H	I	J	K
1	CLLI	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST	# of Techs on Conv. Frame	# of Techs on Module Frame
35	EGLLFLBG	BOWE GARDENS CO	1750 CROTON AVE	MELBOURNE	FL	32935	Y	HOST		4	
36	EGLLFLIH	INDIAN HARBOR BEACH	980 PINETREE DRIVE	SATELLITE BCH	FL	32937	Y	HOST		6	
37	EORNFLMA	EAST ORANGE CO	19544 COLONIAL DR.	ORLANDO	FL	32826	N	REMOTE	ORLDFLAP	2	
38	FLBHFLMA	FLBH HEMLOCK CO	210 S DAYTONA AVE	FLAGLER BCH	FL	32136	N	REMOTE	PLCSFLMA	2	
39	FRBHFLFP	FRBH FIVE POINTS CO	1910 SOUTH 8TH STREET	FERNANDINA BCH	FL	32034	Y	HOST		4	
40	FTGRFLMA	FT GEORGE RSM	9451 HECKSCHER DRIVE	JACKSONVILLE	FL	32226	N	REMOTE	JCVLFLOW	2	
41	FTLDFLAP	Airport	200 Terminal Dr	FT. LAUDERDALE	FL	33315	N	REMOTE	HLWDFLMA	Circuits Wired at Host	
42	FTLDFLCR	Coral Ridge	2530 E Oakland Park Blvd	FT.LAUDERDALE	FL	33306	Y	HOST		8	
43	FTLDFLCY	Cypress	5395 NE 14th Av	FT.LAUDERDALE	FL	33334	Y	HOST		10	
44	FTLDFLJA	Jacaranda	10141 W Broward Blvd	FT.LAUDERDALE	FL	33324	Y	HOST		6	
45	FTLDFLMR	Ft Ldle Main Relief	211 NE 2nd St	FT.LAUDERDALE	FL	33301	Y	HOST		6	4
46	FTLDFLOA	Oakland	4200 W Oakland Park	FT.LAUDERDALE	FL	33313	Y	HOST		10	
47	FTLDFLPL	Plantation	4036 Bryan Blvd	PLANTATION	FL	33317	Y	HOST		8	
48	FTLDFLSG	Sawgrass	14000 NW 8th St	SUNRISE	FL	33325	Y	HOST		No Frame 100% ISLC	
49	FTLDFLSU	Sunrise	8750 W Oakland Park Blvd	BLVD SUNRISE	FL	33351	Y	HOST		4	5
50	FTLDFLWN	Weston	1431 Bonaventure Blvd	FT.LAUDERDALE	FL	33326	Y	HOST		4	
51	FTPRFLMA	Fort Pierce	712 Citrus Av	FT PIERCE	FL	34950	Y	HOST		10	
52	GCSPFLCN	GREEN COVE SPRINGS CO	512 CENTER STREET	GREEN COVE SPGS	FL	32043	Y	HOST		4	
53	GCVLFLMA	GRACEVILLE CO	5370 CLIFF STREET	GRACEVILLE	FL	32440	N	REMOTE	CHPLFLJA	2	
54	GENVFLMA	GENEVA	173 FIRST ST	GENEVA	FL	32732	N	REMOTE	SNFRFLMA	2	
55	GLBRFLMC	Gulf Breeze CO	98 MCCLURE DR	GULF BREEZE	FL	32561	Y	HOST		2	
56	GSVLFLMA	GSVL 2ND AV MAIN CO	400 SW 2ND AVENUE	GAINESVILLE	FL	32601	Y	HOST		8	
57	GSVLFLNW	GSVL NORTHWEST CO	7525 N.W. 5TH PLACE	GAINESVILLE	FL	32601	Y	HOST			2
58	HAVNFLMA	HAVANA CO	111 1ST STREET SE	HAVANA	FL	32333	Y	HOST		2	
59	HBSDFLMA	Hobe Sound	1500 S Dixie Hwy	HOBE SOUND	FL	33455	Y	HOST		4	
60	HLNVFLMA	HOLLEY NAVARRE CO	1810 STATE ROAD 87	NAVARRE	FL	32561	Y	HOST		2	
61	HLWDFLHA	Hallandale	120 NE 12th Av	HALLANDALE	FL	33009	Y	HOST		4	3
62	HLWDFLMA	Hollywood Main	715 N Federal Hwy	HOLLYWOOD	FL	33020	Y	HOST		8	
63	HLWDFLPE	Pembroke	61 NW 98th Av	PEMBROKE PINES	FL	33024	Y	HOST		8	
64	HLWDFLWH	West Hollywood	250 SW 62nd Av	HOLLYWOOD	FL	33023	Y	HOST		8	
65	HMSTFLEA	HMST EAST	2850 NORTH CANAL DR	HOMESTEAD	FL	33033	N	REMOTE	HMSTFLHM	2	
66	HMSTFLHM	Homestead	75 Civic Ct	HOMESTEAD	FL	33030	Y	HOST		6	
67	HMSTFLNA	Naranja	14475 SW 264th St	NARANJA	FL	33032	Y	REMOTE	HMSTFLHM	2	

Attachment
Response to Item No. 45 (a)

	A	B	C	D	E	F	G	H	I	J	K
1	CLLI	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST	# of Techs on Conv. Frame	# of Techs on Module Frame
68	HTISFLMA	Hutchinson Island	10990 S A1A	JRNSEN BEACH	FL	34957	Y	HOST		6	
69	HWTHFLMA	MAIN CO	21 N.W. FIRST STREET	HAWTHORNE	FL	32640	Y	REMOTE	GSVLFLNW	4	
70	ISLMFLMA	Islamorada	US Hwy MM 182	ISLAMORADA	FL	33036	Y	REMOTE	HMSTFLHM	4	
71	JAY-FLMA	JAY CO	107 CHERRY STREET	JAY	FL	32565	N	REMOTE	CNTMFLLE	2	
72	JCBHFLAB	ATLANTIC II CO	13635 ATLANTIC BLVD.	JACKSONVILLE	FL	32225	Y	REMOTE	JCVLFLBW	2	
73	JCBHFLMA	3RD ST MAIN CO	1824 NORTH 3RD STREET	JACKSONVILLE	FL	32250	Y	HOST		6	
74	JCBHFLSP	SAN PABLO CO	3370 THALIA RD	JACKSONVILLE	FL	32250	Y	REMOTE	JCVLFLBW	2	
75	JCVLFLAR	ARLINGTON CO /SOC	7553 ATLANTIC BLVD.	JACKSONVILLE	FL	32211	Y	HOST		8	
76	JCVLFLBW	BEACHWOOD CO	11317 BEACH BLVD.	JACKSONVILLE	FL	32216	Y	HOST		4	
77	JCVLFLCL	JCVL CLAY/PEARL CO	424 PEARL STREET	JACKSONVILLE	FL	32202	Y	HOST		10	5
78	JCVLFLFC	FT CAROLINE CO	6654 FT CAROLINE RD	JACKSONVILLE	FL	32211	Y	HOST		4	
79	JCVLFLIA	INTERNATIONAL AIRPOR	1550 AIRPORT RD	JACKSONVILLE	FL	32218	N	REMOTE	JCVLFLOW	2	
80	JCVLFLJT	JTB CO	4500 SALISBURY RD	JACKSONVILLE	FL	32216	Y	REMOTE	MNDRFLLO	2	
81	JCVLFLLF	LAKE FOREST CO	1441 W EDGEWOOD AVE	JACKSONVILLE	FL	32208	Y	HOST		8	2
82	JCVLFLNO	NORMANDY CO	6602 NORMANDY BLVD.	JACKSONVILLE	FL	32205	Y	HOST		8	
83	JCVLFLOW	JCVL OCEANWAY CO	11741 N MAIN ST	JACKSONVILLE	FL	32218	Y	HOST		4	
84	JCVLFLRV	JCVL RIVERSIDE CO	1710 TALBOT AVENUE	JACKSONVILLE	FL	32205	Y	HOST		8	3
85	JCVLFLSJ	SAN JOSE CO	6234 OLD ST AUGUSTINE RD	JACKSONVILLE	FL	32217	Y	HOST		8	
86	JCVLFLSM	SAN MARCO CO	2048 HENDRICKS AVE	JACKSONVILLE	FL	32207	Y	HOST		4	4
87	JCVLFLWC	WESCONNETT CO	5532 JAMMES RD	JACKSONVILLE	FL	32210	Y	HOST		6	
88	JPTRFLMA	Jupiter	112 Seminole Av	JUPITER	FL	33458	Y	HOST		6	
89	KYHGFLMA	KEYSTONE HEIGHTS MAIN	70 SW MAGNOLIA AVE	KEYSTONE HGHTS	FL	32656	N	REMOTE	GSVLFLNW	4	
90	KYLRFLLS	Largo Sound	US Hwy 1 MM 102.5	LARGO SOUND	FL	33037	Y	REMOTE	HMSTFLHM	4	
91	KYLRFLMA	Key Largo	US Hwy 1 MM 95	KEY LARGO	FL	33037	Y	REMOTE	HMSTFLHM	4	
92	KYWSFLMA	Key West	530 Southard St	KEY WEST	FL	33040	Y	HOST		2	
93	LKCYFLMA	LAKE CITY MAIN	130 WEST NASSAU STREET	LAKE CITY	FL	32055	Y	HOST		4	
94	LKMRFLMA	LAKE MARY DMS	365 INTERNATIONAL PARKWAY	LAKE MARY	FL	32746	Y	HOST		2	
95	LYHNFLMA	LYNNHAVEN DMS	812 OHIO AVE	LYNN HAVEN	FL	32444	Y	HOST		2	
96	MCNPFLMA	MCNP CO	101 N.E. 3RD AVE	MICANOPY	FL	32667	N	REMOTE	GSVLFLNW	2	
97	MDBGFLPM	MDBG PALMETTO CO	3906 MAIN STREET	MIDDLEBURG	FL	32068	Y	HOST		4	
98	MIAMFLAE	Alhambra	115 Alhambra Dr	CORAL GABLES	FL	33134	Y	HOST		6	3
99	MIAMFLAL	Allapattah	2470 NW 38th St	MIAMI	FL	33142	Y	HOST		10	2
100	MIAMFLAP	Airport	5275 NW 36th St	MIAMI	FL	33166	Y	HOST		8	

Attachment
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	A	B	C	D	E	F	G	H	I	J	K
1	CLLI	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST	# of Techs on Conv. Frame	# of Techs on Module Frame
101	MIAMFLBA	Bayshore	2010 NW 17th Av	MIAMI	FL	33142	Y	HOST		8	
102	MIAMFLBC	Biscayne	251 NW 29th St	MIAMI	FL	33056	Y	HOST		4	
103	MIAMFLBR	Beach Relief	1550 Lennox Av	MIAMI	FL	33127	Y	HOST		6	4
104	MIAMFLCA	Canal	2301 SW 100th Av	MIAMI	FL	33165	Y	HOST		10	
105	MIAMFLDB	Dadeland	9405 Old Dixie Hwy	MIAMI	FL	33156	N	REMOTE	MIAMFLRR	2	
106	MIAMFLFL	Flagler	2105 W. Flagler	MIAMI	FL	33135	Y	HOST		8	
107	MIAMFLGR	Grande	45 NW 5th St	MIAMI	FL	33128	Y	HOST		8	4
108	MIAMFLHL	Hialeah	1245 W 69th St	HIALEAH	FL	33141	Y	HOST		10	
109	MIAMFLIC	Indian Creek	6800 Harding Av	MIAMI BEACH	FL	33142	Y	HOST		6	
110	MIAMFLKE	Key Biscayne	89 Westwood Dr	KEY BISCAYNE	FL	33149	Y	HOST		4	
111	MIAMFLME	Miami Metro	1380 NW 21st St	MIAMI	FL	33138	Y	HOST		8	2
112	MIAMFLNM	North Miami	1360 NE 127th St	NORTH MIAMI	FL	33147	Y	HOST		6	
113	MIAMFLNS	Northside	2615 NW 79th St	MIAMI	FL	33169	Y	HOST		6	
114	MIAMFLOL	Opa Locka	2660 E Superior St	MIAMI	FL	33178	Y	HOST		10	
115	MIAMFLPB	Poinciana	25 Nahkoda Dr	MIAMI	FL	33166	Y	HOST		8	
116	MIAMFLPL	Palmetto	9056 NW 41st St	MIAMI	FL	33164	Y	HOST		10	
117	MIAMFLRR	Red Road	6100 SW 57th Av	MIAMI	FL	33143	Y	HOST		8	
118	MIAMFLSH	Miami Shores	8451 NE 1st Av	MIAMI	FL	33161	Y	HOST		6	3
119	MIAMFLSO	Silver Oaks	10701 SW 88th St	MIAMI	FL	33176	Y	HOST		4	4
120	MIAMFLWD	West Dade	15000 SW 88th St	MIAMI	FL	33196	Y	HOST		4	3
121	MIAMFLWM	West Miami	1155 SW 67th Av	MIAMI	FL	33144	Y	HOST		8	
122	MICCFLBB	Barefoot Bay	720 Egret Cir	MICCO	FL	32957	N	REMOTE	VRBHFLMA	2	
123	MLBRFLMA	MELBOURNE MAIN	728 E PALMETTO AVE	MELBOURNE	FL	32901	Y	HOST		8	
124	MLTNFLRA	MILTON CO	6749 RAVINE STREET	MILTON	FL	32570	Y	HOST		4	
125	MNDRFLAV	MNDR AVENUES CO	8923 W WAY-SUITE 100	JACKSONVILLE	FL	32217	Y	HOST		2	
126	MNDRFLLO	LORETTO CO	11498 ST. AUGUSTINE ROAD	JACKSONVILLE	FL	32223	Y	HOST		4	
127	MNDRFLLW	MNDR/LEMONWOOD CO	577 SR 13	FRUIT COVE	FL	32223	N	REMOTE	MNDRFLLO	2	
128	MNSNFLMA	MUNSON CO	11686 MUNSON WAY	MUNSON	FL	32531	N	REMOTE	CNTMFLLE	2	
129	MRTHFLVE	Marathon/Vaca	US Hwy 1 MM 54.5	MARATHON	FL	33050	Y	REMOTE	KYWSFLMA	4	
130	MXVLFLMA	MAXVILLE CO	8455 MAXVILLE BLVD	JACKSONVILLE	FL	32226	N	REMOTE	JCVLFLWC	2	
131	NDADFLAC	Arch Creek	2100 NE 164th St	MIAMI	FL	33139	Y	HOST		6	4
132	NDADFLBR	Brentwood	18560 NW 27th Av	MIAMI	FL	33179	Y	HOST		8	
133	NDADFLGG	Golden Glades	18400 NE 5th Av	MIAMI	FL	33179	Y	HOST		8	

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1	CLLI	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST	# of Techs on Conv. Frame	# of Techs on Module Frame
134	NDADFLOL	Oleta	19251 NE 26th Av	MIAMI	FL	33054	Y	HOST		8	
135	NKLRFLMA	North Key Largo	Ocean Key Club St Rd 905	NORTH KEY LARGO	FL	33037	Y	REMOTE	HMSTFLHM	2	
136	NSBHFLMA	NEW SMYRNA	100 CANAL ST	NEW SMYRNA BCH	FL	32169	Y	HOST		6	
137	NWBYFLMA	NWBY MAIN CO	25410 NW 1ST AVE	NEWBERRY	FL	32669	Y	REMOTE	GSVLFLNW	2	
138	OKHLFLMA	OKHL MAIN CO	153 BELL AVE	OAKHILL	FL	32759	N	REMOTE	DYBHFLPO	2	
139	OLTWFLLN	OLTW CO	LEON ST NO NUMBER	OLD TOWN	FL	32680	N	REMOTE	GSVLFLNW	2	
140	ORLDFLAP	AZALEA PARK	7320 LAKE UNDER HILL RD	ORLANDO	FL	32807	Y	HOST		8	
141	ORLDFLCL	COLONIAL ESS	2315 EAST CENTRAL BLVD	ORLANDO	FL	32803	Y	HOST		6	
142	ORLDFLMA	N MAGNOLIA ESS	45 NORTH MAGNOLIA AVENUE	ORLANDO	FL	32801	Y	HOST		10	5
143	ORLDFLPC	PINECASTLE CO	6621 SOUTH ORANGE AVENUE	ORLANDO	FL	32809	Y	HOST		8	
144	ORLDFLPH	PINE HILLS CO	5120 SILVER STAR ROAD	ORLANDO	FL	32808	Y	HOST		10	
145	ORLDFLSA	SANDLAKE ESS	4959 SANDLAKE ROAD	ORLANDO	FL	32809	Y	HOST		4	
146	ORPKFLMA	MCINTOSH MAIN CO	150 MCINTOSH AVE	ORANGE PARK	FL	32073	Y	HOST		6	
147	ORPKFLRW	RIDGEWOOD CO	721 BLANDING BLVD - B	ORANGE PARK	FL	32073	Y	HOST		2	
148	OVIDFLCA	OVIEDO	84 SOUTH CENTRAL AVE	OVIEDO	FL	32765	Y	HOST		4	
149	PACEFLPV	PACE CO	4351 HIGHWAY 90	PACE	FL	32571	Y	REMOTE	MLTNFLRA	2	
150	PAHKFLMA	Pahokee	826 E Main St	PAHOKEE	FL	33479	N	REMOTE	BLGLFLMA	4	
151	PCBHFLNT	BEACH CO	604 NAUTILUS	PANAMA CITY	FL	32401	Y	HOST		4	
152	PLCSFLMA	CLUB HOUSE DR ESS	5 CLUBHOUSE DR	PALM COAST	FL	32137	Y	HOST		2	
153	PLTKFLMA	PALATKA MAIN ST CO	319 MAIN STREET	PALATKA	FL	32177	Y	HOST		8	
154	PMBHFLCS	PMBH Coral Springs	9420 Royal Palm Blvd	Coral Springs	FL	33065	Y	HOST		8	
155	PMBHFLFE	Pompano Federal	1230 N Federal Hwy	POMPANO BEACH	FL	33062	Y	HOST		8	
156	PMBHFLMA	Margate	1180 Banks Rd	MARGATE	FL	33063	Y	HOST		8	
157	PMBHFLNP	NORTH POWERLINE	1551 N. POWERLINE	FT. LAUDERDALE	FL		Y	REMOTE	PMBHFLTA	Circuits Wired at Host	
158	PMBHFLTA	Tamarac	7600 N University Dr	TAMARAC	FL	33321	Y	HOST		6	
159	PMPKFLMA	POMONA RSM	212 WORCHESTER RD	POMONA PARK	FL	32181	N	REMOTE	PLTKFLMA	2	
160	PNCYFLCA	CALLOWAY CO	6609 EAST ST. RD. 22	PANAMA CITY	FL	32401	Y	REMOTE	PNCYFLMA	2	
161	PNCYFLMA	PANAMA CITY DMS	111 EAST 5TH STREET	PANAMA CITY	FL	32401	Y	HOST		6	
162	PNSCFLBL	BELMONT CO	30 WEST BELMONT STREET	PENSACOLA	FL	32501	Y	HOST		8	
163	PNSCFLFP	FERRY PASS CO	1725 OLIVE ROAD	PENSACOLA	FL	32504	Y	HOST		6	
164	PNSCFLHC	HILLCREST CO	6913 PINE FOREST RD NW	PENSACOLA	FL	32506	Y	REMOTE	PNSCFLFP	4	
165	PNSCFLPB	PERDIDO CO	5575 LARIMER ST	PERDIDO	FL	32507	Y	HOST		2	
166	PNSCFLWA	WARRINGTON CO	515 S OLD CORRY FIELD RD	PENSACOLA	FL	32507	Y	HOST		6	

Attachment
Response to Item No 45 (a)

	A	B	C	D	E	F	G	H	I	J	K
1	CLLI	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST	# of Techs on Conv. Frame	# of Techs on Module Frame
167	PNVDFLMA	PONTE VEDRA MAIN CO	637 A1A N	PONTE VEDRA BCH	FL	32082	Y	HOST		4	
168	PRRNFLMA	Perrine	16645 US Hwy 1	MIAMI	FL	33157	Y	HOST		10	
169	PRSNFLFD	PIERSON	112 N FOUNTAIN DR	PIERSON	FL	32180	N	REMOTE	DELDFLMA	2	
170	PTSLFLMA	Port St. Lucie Main	450 Irving St	PT ST LUCIE	FL	34983	Y	HOST		4	
171	PTSLFLSO	Port St Lucie South	2002 Pt St Lucie Blvd	PORT ST LUCIE SOUTH	FL	34953	N	HOST		2	
172	SBSTFLFE	Fellsmere	5 Bay St	FELLSMERE	FL	32948	N	REMOTE	VRBHFLMA	2	
173	SBSTFLMA	Sebastian	1137 US Hwy 1	SEBASTIAN	FL	32958	Y	HOST		4	
174	SGKYFLMA	Sugarloaf Key	19921 Overseas Hwy	SUGARLOAF KEY	FL	33042	N	REMOTE	KYWSFLMA	2	
175	SNFRFLMA	SANFORD	501 W 9TH ST	SANFORD	FL	32771	Y	HOST		8	
176	STAGFLBS	ST AUG BEACHES CO	4900 A1A SOUTH	ST AUGUSTINE	FL	32084	N	REMOTE	STAGFLMA	2	
177	STAGFLMA	ST AUG MAIN	69 CORDOVA STREET	ST AUGUSTINE	FL	32084	Y	HOST		4	
178	STAGFLSH	STAG SHORES ESS	4460 US #1 SOUTH	ST AUGUSTINE	FL	32084	Y	REMOTE	STAGFLMA	4	
179	STAGFLWG	WLD GOLF VILLAGE CO	4875 STATE ROAD 16	ST AUGUSTINE	FL	32095	N	REMOTE	MNDRFLLO	2	
180	STRTFLMA	Stuart	305 W 3rd St	STUART	FL	34994	Y	HOST		8	
181	SYHSFLCC	SUNNY HILLS DMS	4228 COUNTRY CLUB LANE	SUNNY HILLS	FL	32463	N	REMOTE	CHPLFLJA	2	
182	TRENFLMA	TREN MAIN CO	213 N W 1ST ST.	TRENTON	FL	32693	Y	REMOTE	GSVLFLNW	2	
183	TTVLFLMA	TITUSVILLE CO	620 HOPKINS STREET	TITUSVILLE	FL	32796	Y	HOST		6	
184	VERNFLMA	VERNON CO	3321 COURT AVENUE	VERNON	FL	32462	N	REMOTE	CHPLFLJA	2	
185	VRBHFLBE	Vero Beachland	766 Beachland Blvd	VERO BEACH	FL	32963	N	REMOTE	SBSTFLMA	4	
186	VRBHFLMA	Vero Main	1976 16th St	VERO BEACH	FL	32960	Y	HOST		10	
187	WELKFLMA	WELAKA MAIN CO	301 3RD AVE	WELAKA	FL	32193	N	REMOTE	PLTKFLMA	2	
188	WPBHFLAN	Palm Bch Annex	325 Gardenia St	WEST PALM BEACH	FL	33401	Y	HOST		8	
189	WPBHFLGA	Green Acres	3800 S Military Trail	LAKE WORTH	FL	33463	Y	HOST		8	
190	WPBHFLGR	Palm Bch Gardens	3700 RCA Blvd	PALM BEACH GARDENS	FL	33410	Y	HOST		6	
191	WPBHFLHH	Haverhill	1550 N Haverhill Rd	WEST PALM BEACH	FL	33417	Y	HOST		6	4
192	WPBHFLLE	Lake Worth	120 N K St	LAKE WORTH	FL	33460	Y	HOST		6	
193	WPBHFLRB	Riviera Beach	3640 Ave E	RIVIERA BEACH	FL	33404	Y	HOST		8	5
194	WPBHFLRP	Royal Palm	11455 State Rd 80	ROYAL PALM BEACH	FL	33411	Y	HOST		6	
195	WWSPFLHI	HIGHLAND CO	9401 CORTEZ BLVD	BROOKSVILLE	FL	34613	Y	HOST		4	
196	WWSPFLSH	SPRING HILL CO	1395 DELTONA BLVD	SPRING HILL	FL	34606	Y	HOST		4	
197	YNFNFLMA	YOUNGSTOWN CO	12102 AZALEA ST	FOUNTAIN	FL	32438	N	REMOTE	LYHNFLMA	2	
198	YNTWFLMA	YANKEETOWN CO SR40	SCHOOLCRAFT STREET	YANKEETOWN	FL	34498	N	REMOTE	BKVLFLJF	2	
199	YULEFLMA	YULEE RSC	S.R. 200 & U.S. 17	YULEE	FL	32097	N	REMOTE	JCVLFLOW	2	

REQUEST: Referring to Direct Testimony of John Ruscilli, page 18, provide all supporting documentation for the 10% discount.

RESPONSE: BellSouth has no responsive documents.

REQUEST: Refer to the Direct Testimony of Kenneth Ainsworth, page 36, what is the combined annual salary (with benefits), for the 425 CWINS personnel and 105 service representatives in the LCSCs BellSouth proposes to add to provision loops in the absence of unbundled local switching?

RESPONSE: For the period 2005 through 2007, the projected annual salary (with benefits) costs for the 425 additional CWINS personnel and the 105 additional service representatives would be $40,737,000 annually.

RESPONSE PROVIDED BY: Ken L. Ainsworth

REQUEST: Referring to Exhibit AH-1 attached to the Direct Testimony of Alfred Heartley, what is the combined annual salary (with benefits) for the 1000 additional personnel BellSouth is proposing to add to provision loops in Florida in the absence of unbundled local switching?

RESPONSE: Estimated expense due to salary, benefits, taxes and tools for 1,080 additional employees proposed in Florida is approximately $83.2M annually.

The projected force will be reduced due to a correction made to the Force and Load Model to be included with the Rebuttal Testimony of Mr. Heartley. The revised requirement for Florida is 759 employees. The expense for the revised force is estimated to be $58.5M annually.

The revised Force and Load Model is provided in BellSouth's response to AT&T's Third Request for Production, Item No. 42. The responsive document is proprietary and is being provided pursuant to the terms of the parties' protective agreement

RESPONSE PROVIDED BY: Alfred Heartley