

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

MARY CONQUEST

On Behalf of

ITC^DeltaCom Communications, Inc.

DOCKET NO. 041269-TP

**GENERIC PROCEEDING TO EXAMINE ISSUES RELATED TO BELLSOUTH'S
OBLIGATION TO PROVIDE UNBUNDLED NETWORK ELEMENTS**

August 16, 2005

DOCUMENT NUMBER-DATE

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Q: PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

A: My name is Mary Conquest. I am Program Manager for Inter-Company Relations, at ITC^DeltaCom Communications, Inc. and Business Telecom, ("ITC^DeltaCom" & "BTI"). My business address is 7067 Old Madison Pike, Huntsville, Alabama 35806.

Q: PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE AND BACKGROUND.

A: I received a Masters Certificate from George Washington University in the area of Project Management. I have been employed in the telecommunications industry for over 39 years. I began my career with Southern Bell, now known as BellSouth Telecommunications, Inc. ("BellSouth"), in 1966. I held various positions within BellSouth over that time. I also have been engaged as a consultant to BellSouth. I retired from BellSouth in December of 1996. I have worked for ITC^DeltaCom as a Consultant and I am currently an employee in the Regulatory Department, serving as Program Manager.

Q: HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A: Yes. I testified in proceedings related to Operational Support Systems and Performance Measures, and the ITC^DeltaCom Arbitration.

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Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A: The purpose of my testimony is to provide this Commission with factual testimony regarding DeltaCom's experiences with the bulk migration process from UNE-P to UNE-L. This is described as Issue 2, the transition of the embedded base for former UNEs.

Q: HAS BELLSOUTH PROVIDED NOTICE OF ITS PROPOSED DEADLINES TO THE CLEC COMMUNITY , REQUIRING CLECs TO DELIVER SPREADSHEETS TO BELLSOUTH PRIOR TO THE ORDERED DATES?

A: No. In the BellSouth Attachment 2 Template, for Interconnection Agreement, dates for the delivery of conversion spreadsheets are shown. BellSouth, however, has not provided notice to the CLEC(s) of this demand, nor have they negotiated a timeline for spreadsheet delivery. No Carrier notices (SN's) have been posted to the website which contain the dates. DeltaCom is very concerned about the upcoming March 11, 2006 deadlines, but as discussed by Mr. Watts, BellSouth has been unwilling to work with DeltaCom to reach an interim agreement.

Q: WHAT EXPERIENCE HAS ITC^DELTACOM/BTI HAD REGARDING THE TRANSITION OF EMBEDDED UNE-P SERVICE TO UNE-L, USING THE BULK MIGRATION PROCESS?

1 A: BellSouth has not complied with its own bulk migration guideline posted on its
2 website and filed with the FCC. The following are examples experienced by
3 ITC^DeltaCom:

4

- 5 • To date no cut for non-coordinated bulk migration has been 100%
6 successful.

7 For example, Bulk Order Package Identifier (BOPI) MS03284614SO,
8 contained 38 lines which were given a commit date of March 28, 2005
9 then placed in Missed Appointment (MA) status due to BellSouth not being
10 ready. CWINS stated the root cause "The collocation configuration was in
11 an old outdated configuration." (MVC-Exhibit 1) BellSouth further stated
12 "the CO was not wiring and they had to dispatch a tech. All lines were
13 coming up no dial tone, Bell said that they should be worked before the
14 end of this week."

15

- 16 • Notices are received late if at all. MVC-Exhibit 2. BellSouth's Guide,
17 Section 6.3, for Bulk Migration, Two (2) Hours To Go Ahead Notification
18 (For Non-Coordinated Bulk Migration) states notification will be provided
19 using one of three methods, fax, e-mail, or web based tool. The CLEC is
20 to be notified within a maximum of 2 hours of the cut over. The completion
21 notice is the trigger the CLEC uses to port or cut the customer over to the
22 CLEC's network. Lengthy delays in receiving the notice are causing
23 customer's to be without service for extended time periods.

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● RollBack/Throwback process doesn't work efficiently for customer's who go down. When a customer is out of service, our center must e-mail the CWINS center within 24 hours of the cut and request the "throwback". If the number port has been completed the center must also call Fleming Island LCSC to coordinate. The CLEC center must also notify the Project Manager, and either send a supplemental request for a new date or request to cancel the request. The process is labor intense and encounters frequent challenges.

- PMAP Tool has slow response time and some Reports are not available. MVC-Exhibit 3. BellSouth created a tool on the Performance Measures and Analysis Platform (PMAP) site to provide order statusing relative to bulk migrations. The tool provides due date availability, special handling, options, and status.
- Root Cause Explanation for Outages. BellSouth is unable to provide a resolution. BellSouth finds "system problem" unique to "this order", but unable to provide resolution. MVC-Exhibit4

Q: DOES THE CONVERSION PROCESS ALLOW FOR TIMELY ESCALATIONS?

1 A: No, outages last for hours and require resources that are already scheduled to
2 work on new cuts. The process is long and cumbersome, and more importantly
3 the customer is hurt, and the outage normally occurs during critical working hours
4 for business/government customers. Furthermore, DeltaCom is placed in a bad
5 light due to the fact that we are not in control of the conversion and are not
6 provided information by BellSouth that permits us to communicate effectively with
7 the customer. BellSouth provides vague explanations as to the root cause of the
8 problem.

9

10

11 **Q: DO YOU SEE ANY OTHER PROBLEMS WITH BELLSOUTH'S PROPOSED**
12 **LANGUAGE ON BULK MIGRATIONS?**

13

14 A: Yes. As noted by Mr. Watts, DeltaCom has attempted to negotiate rates, terms
15 and conditions associated with the TRO/TRRO and other FCC orders. DeltaCom
16 filed a separate petition for mediation and dispute resolution. During the
17 negotiations, DeltaCom requested and BellSouth never responded that BellSouth
18 honor its ten percent discount on non-recurring charges associated with bulk
19 migration orders which BellSouth committed to the FCC. At paragraph 213 of the
20 TRRO the FCC noted that in BellSouth's Comments to the FCC at 24 and at 34,
21 BellSouth stated that it offers "a batch hot cut process at a ten percent discount
22 off of the applicable state –established hot cut NRC to account for efficiencies
23 gained by using a batch process." (See MVC Exhibit 5). BellSouth has thus far

1 refused to provide DeltaCom the ten percent discount on a stand-alone basis
2 without adopting BellSouth's entire template, Attachment 2 language for the
3 TRO/TRRO and because of the upcoming deadline March 10, 2006 deadline
4 DeltaCom has had to place orders for UNE-P to UNE-L migration. DeltaCom has
5 also requested in negotiations to have a true-up of this discount back to March
6 11, 2005 and BellSouth has failed to respond. Additionally, DeltaCom has placed
7 migration orders as coordinated rather than non-coordinated because of the
8 problems experienced. DeltaCom requests that this Commission adopt on an
9 interim basis the BellSouth discount of ten percent to be applied back to the date
10 of March 11, 2005, subject to the establishment of a permanent rate for bulk
11 migrations

12
13 **Q: WHAT ACTIONS DO YOU RECOMMEND THAT THIS COMMISSION TAKE?**

14 **A:** I recommend that the Commission take the following actions: (1) adopt the
15 language recommended by Mr. Joe Gillan that requires BellSouth to take
16 financial responsibility for mishandling these conversions and failing to live up to
17 the guidelines BellSouth itself has created and (2) require performance measure
18 report tools to be in service and working so as to monitor performance and (3)
19 require BellSouth to honor its statements made to the FCC regarding the rates
20 for bulk migration subject to true-up and (4) establish a permanent rate for bulk
21 migrations.

1 Q: ARE THERE ANY ISSUES NEGOTIATED AS PART OF THE CHANGE OF
2 LAW PROCESS INDIVIDUALLY WITH BELLSOUTH THAT DELTACOM
3 SEEKS RESOLUTION?

4 A: Yes. However as more fully discussed in Mr. Watts testimony BellSouth has
5 moved to dismiss our request for mediation and dispute resolution. In our petition
6 for mediation and dispute resolution we sought to include the following language:

7

8 *Insofar as it is technically feasible, BellSouth shall test and report*
9 *troubles for all the features, functions, and capabilities of conditioned*
10 *copper lines, and may not restrict its testing to voice transmission*
11 *only. [47 C.F.R. 51.319 a 3(iii) (C)]. Where the root cause of the trouble*
12 *is debatable or difficult to identify and it is a chronic trouble, BellSouth*
13 *and ITCB shall schedule a technical meeting.*

14

15 DeltaCom and BellSouth should be required test and provide each other test
16 results for reported troubles for all the features, functions, and capabilities of
17 conditioned copper lines.

18

19 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

20 A: Yes.

MVC

Exhibit 1

Conquest, Mary (ITCD)

From: Griffin, John M [John.Griffin@BellSouth.com]
Sent: Monday, April 04, 2005 7:21 AM
To: Conquest, Mary (ITCD)
Cc: Wheeler, Brad; Garney, Cara; Edwards, Nanette (ITCD)
Subject: RE: Accounts put in MA Status 3.28.05

Mary,

The embedded messages made no mention of AL orders. The MS orders are the ones affected by the Collocation configuration. You need to take no action; this was an education issue and has been corrected.

Do you have any specifics on the AL orders? I will check with your project manager and see what he can tell me about them and get back with you.

John Griffin
CWINS Support Manager
205-714-0491

-----Original Message-----

From: Conquest, Mary (ITCD) [mailto:mconquest@itcdeltacom.com]
Sent: Thursday, March 31, 2005 4:21 PM
To: Griffin, John M
Cc: Conquest, Mary (ITCD); Wheeler, Brad; Garney, Cara; Edwards, Nanette (ITCD)
Subject: RE: Accounts put in MA Status 3.28.05

John,
Are you saying both the MS and AL problems were "an old outdated configuration"? How does one go about checking this information before customer's are impacted? Would your process not flag this issue before noticing my centers?
Still need a better understanding how to resolve the issue so it doesn't happen in the future.
Mary

-----Original Message-----

From: Griffin, John M [mailto:John.Griffin@BellSouth.com]
Sent: Thursday, March 31, 2005 4:09 PM
To: Conquest, Mary (ITCD)
Subject: RE: Accounts put in MA Status 3.28.05

Mary,

I am aware of what went on with these. The collocation configuration was in an old outdated configuration. The CO technicians have been made aware of this and there should be no repeat. *

John Griffin
CWINS Support Manager
205-714-0491

-----Original Message-----

From: Conquest, Mary (ITCD) [mailto:mconquest@itcdeltacom.com]
Sent: Wednesday, March 30, 2005 10:15 AM
To: Griffin, John M
Subject: FW: Accounts put in MA Status 3.28.05
Importance: High

HELP

-----Original Message-----

From: Ray, Kathryn B [mailto:Kathryn.B.Ray@BellSouth.com]
Sent: Wednesday, March 30, 2005 10:06 AM
To: Conquest, Mary (ITCD)
Subject: Accounts put in MA Status 3.28.05
Importance: High

Mary,

I understand that Ms. Garney and others worked with Ann Tarawneh's group on Tuesday regarding this issue. You will need to redirect your electronic message to Ann Tarawneh, and since you are asking about the Root Cause, to the CWINS Customer Support Manager, John Griffin.

Kathryn Ray

-----Original Message-----

From: Conquest, Mary (ITCD) [mailto:mconquest@itcdeltacom.com]
Sent: Wednesday, March 30, 2005 8:40 AM
To: Ferguson, Cassandra; Ray, Kathryn B
Cc: Conquest, Mary (ITCD); Edwards, Nanette (ITCD)
Subject: FW: Accounts put in MA Status 3.28.05

Casi/Kathy,

This is not a complaint about your support, but rather a plea for you to bring this mess to your upper management's attention. Our agreement was that beginning Monday your centers would be re-trained and all would function smoothly. As all the e-mails indicate that is not the case. We have been in Alabama and Mississippi and find BST is not living up to their commitments, by the way which appear in testimony and on your web site. You are impacting our ability to move our base to facility service, and we have a date set, by which this must be accomplished.

What is needed to get the centers attention? Are your OSS's not functioning correctly? What Root Cause are you finding on your side.

Please respond via e-mail by close of business today. Thanking you in advance, Mary
Conquest InterCompany Program Manager ITC^DeltaCom/BTI

-----Original Message-----

From: Garney, Cara
Sent: Tuesday, March 29, 2005 11:50 AM
To: 'Casi Ferguson (E-mail)'
Cc: Conquest, Mary (ITCD); Wheeler, Brad; Kimball, Lee
Subject: FW: Accounts put in MA Status 3.28.05

Casi

Please see below. We have committed a certain number of cuts per day based on the guidelines we received regarding the number of cuts Bell can do per day. How can we ensure this does not happen going forward?

Regards,
Cara Garney

-----Original Message-----

From: Garney, Cara <Cara.Garney@itcdeltacom.com>
To: Conquest, Mary (ITCD) <mconquest@itcdeltacom.com>
CC: Tucker, Randy (ITCD) <RTucker@itcdeltacom.com>; Kimball, Lee <Lee.Kimball@itcdeltacom.com>; Lane, Brenda (ITCD) <BLane@itcdeltacom.com>; Stewart Teresa (ITCD) <TStewart@itcdeltacom.com>; Washburn, Rhonda (ITCD) <RWashburn@itcdeltacom.com>; Edwards, Nanette (ITCD) <NEdwards@itcdeltacom.com>

Sent: Tue Mar 29 12:19:13 2005
Subject: Accounts put in MA Status 3.28.05

Mary,

We had 38 lines FOC'd for 3.28.05. 21 were put into MA status due to the Bell not being ready.

See details:

Fillingane Sam Dr. MS# 4104253 BOPI# MS03284614S0, LINE 1 We had to put in MA status. Jack Steel Service Corp MS# 4104247 BOPI#MS03284614S0, LINE 4 Per Kevin x 2218 Placed in MA status RM
Ablest Staffing Services Inc. MS#4104249 BOPI#MS03284614S0, LINE 1 (MA) Compounding Marty's Pharmacy MS#4104255 BOPI#MS03284614S0, LINE 1 (MA) Health Information Design MS#4104258 BOPI#MS03284614S0, LINE 2 (MA) Freeman Frank B DMD MS#4104259 BOPI#MS03284614S0, LINE2 (MA) Dogwood Physical Therpy
MS#4104269 BOPI# MS03284614S0, LINE 2 (MA) Delta Muffler and Exhaust MS#4104270 BOPI#MS03284614S0, LINE 2 (MA) Park Management
MS#4104272 BOPI#MS03284614S0, LINE 2 (MA) Texaco Interstate Stations
MS#4104267 BOPI#MS03284614S0, LINE 1 (MA) Caribian Insurance Agency
MS#4098484 BOPI#NC03214614S0, LINE 3 (MA)

Thanks,
Cara

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Conquest, Mary (ITCD)

From: Lane, Brenda (ITCD)
Sent: Tuesday, March 29, 2005 1:07 PM
To: Garney, Cara; Washburn, Rhonda (ITCD)
Cc: Conquest, Mary (ITCD)
Subject: RE: Accounts put in MA Status 3.28.05

We have escalated to Ann 205-214-0700 (our Project Managers Boss). Per Jack Shawl in CWINS yesterday ~~she was not willing and they had to dispat~~. Per Clarence this is no where in there notes. All the lines were coming up as no dial tone. Ann and Clarence are checking and will call us back. We are stating we should not have to sup the orders that they should be worked before the end of this week.

Thanks

Brenda Lane
Manager
Account Coordination Team
256-264-1621
256-264-1060 Fax
blane@itcdeltacom.com

-----Original Message-----

From: Garney, Cara
Sent: Tuesday, March 29, 2005 11:26 AM
To: Lane, Brenda (ITCD); Washburn, Rhonda (ITCD)
Subject: FW: Accounts put in MA Status 3.28.05

What level have we escalated to at Bell? What date are we rescheduled to?

-----Original Message-----

From: Kimball, Lee
Sent: Tuesday, March 29, 2005 12:25 PM
To: Garney, Cara
Subject: Re: Accounts put in MA Status 3.28.05

This is not good!

Let me know if we need to escalate..

-----Original Message-----

From: Garney, Cara <Cara.Garney@itcdeltacom.com>
To: Conquest, Mary (ITCD) <mconquest@itcdeltacom.com>
CC: Tucker, Randy (ITCD) <RTucker@itcdeltacom.com>; Kimball, Lee <Lee.Kimball@itcdeltacom.com>; Lane, Brenda (ITCD) <BLane@itcdeltacom.com>; Stewart, Teresa (ITCD) <TStewart@itcdeltacom.com>; Washburn, Rhonda (ITCD) <RWashburn@itcdeltacom.com>; Edwards, Nanette (ITCD) <NEdwards@itcdeltacom.com>
Sent: Tue Mar 29 12:19:13 2005
Subject: Accounts put in MA Status 3.28.05

Mary

We had 38 lines FOC'd for 3.28.05 21 were put into MA status due to the Bell not being ready.

See details:

Fillingane Sam Dr. MS# 4104253 BOPI# MS03284614S0, LINE 1 We had to put in MA status.
Jack Steel Service Corp MS# 4104247 BOPI#MS03284614S0, LINE 4 Per Kevin x 2218 Placed i.

MA status RM

Ablest Staffing Services Inc. MS#4104249 BOPI#MS03284614S0, LINE 1 (MA) Compunding Marty's Pharmacy MS#4104255 BOPI#MS03284614S0, LINE 1 (MA) Health Information Design MS#4104258 BOPI#MS03284614S0, LINE 2 (MA) Freeman Frank B DMD MS#4104259 BOPI#MS03284614S0, LINE2 (MA) Dogwood Physical Therpy MS#4104269 BOPI# MS03284614S0, LINE 2 (MA) Delta Muffler and Exhaust MS#4104270 BOPI#MS03284614S0, LINE 2 (MA) Park Management MS#4104272 BOPI#MS03284614S0, LINE 2 (MA) Texaco Interstate Stations MS#4104267 BOPI#MS03284614S0, LINE 1 (MA) Caribbean Insurance Agency MS#4098484 BOPI#NC03214614S0, LINE 3 (MA)

Thanks,
Cara

Conquest, Mary (ITCD)

From: Wheeler, Brad
Sent: Wednesday, March 23, 2005 4:53 PM
To: Wheeler, Brad; 'Casi Ferguson (E-mail)'
Cc: Conquest, Mary (ITCD); Garney, Cara
Subject: RE: CANT OPEN TKT

called bell for status on tkt.
It was closed [REDACTED] Bell repaired jumper in x-box

-bw
x6933

-----Original Message-----

From: Wheeler, Brad
Sent: Wednesday, March 23, 2005 12:50 PM
To: Wheeler, Brad; Casi Ferguson (E-mail)
Cc: Conquest, Mary (ITCD); Garney, Cara
Subject: RE: CANT OPEN TKT

~~It was manually created.~~
Originally given [REDACTED] to GOB today after I complained

-bw
x6933

-----Original Message-----

From: Wheeler, Brad
Sent: Wednesday, March 23, 2005 12:21 PM
To: Casi Ferguson (E-mail)
Cc: Conquest, Mary (ITCD)
Subject: CANT OPEN TKT

Everyone keeps saying that they have no record for the following order and circuits for us to open a trouble against!
How is this possible? I have been on the phone for over 20 minutes!!!
This is the [REDACTED] who was down for 4 hours [REDACTED] because we did not see Go-ahead Notification.
~~Page 2 of 2~~

-----Original Message-----

From: Tech.Talk@BellSouth.com [mailto:Tech.Talk@BellSouth.com]
Sent: Tuesday, March 22, 2005 7:02 PM
To: BLane@itcdeltacom.com; Cindy.Doerfer@itcdeltacom.com
Subject: BellSouth

BELLSOUTH --- Go-Ahead Notification

BellSout has completed The transfer of the following circuit(s) to your fa lities

Order Type and Number N143QPY5
Due Date: 20050321
Wire Center: 256764

Exchange Carrier ID: 7727
Purchase Order Number: BWFLRNALMA10
Billing Account Number 256 M69-6304

Local Serving Office:
BellSouth Circuit Identification:
Your Circuit Identification (if provided)

256764
10.TYNU.506301..SC

Local Serving Office:
BellSouth Circuit Identification:
Your Circuit Identification (if provided):

256764
10.TYNU.506302..SC

-bw
x6933

MVC

Exhibit 2

Conquest, Mary (ITCD)

From: Lane, Brenda (ITCD)
Sent: Tuesday, July 19, 2005 5:44 PM
To: Tucker, Randy (ITCD); Stewart, Teresa (ITCD)
Cc: Gamey, Cara; Conquest, Mary (ITCD)
Subject: Non-Coordinated BOPI TN07194614B0

9 customers / 25 lines

We had one customer that was dropped this time around. The go-ahead notification was not received on PON DLT5UNEL4136279A (5 lines).

BTN 423-892-8539
Bell Order # N958B1H2

Customer called in a trouble at 1:49pm, the lines were activated at 3:41pm. TT# 11418411

Thanks

Brenda Lane
Manager
Account Coordination Team
256-264-1621
256-264-1060 Fax
blane@itcdeltacom.com

7-20 John L. V. f

7/20/2005

MVC

Exhibit 3

Conquest, Mary (ITCD)

From: Gardner, Deborah L [Deborah.Gardner@bellsouth.com]
Sent: Friday, August 05, 2005 10:55 AM
To: mconquest@itcdeltacom.com
Cc: Sherwood, Suzy
Subject: FW: Feedback request (sent via Oracle):

Mary,

The completed BOPIs not appearing on the Completed / Cancelled Report should be fixed as of 8/22. This had already been internally identified and the repair scheduled.

Completed Cancelled BOPIs should appear on that report for 7 days

The cause of the response time slow down was identified Aug 2 and a request was submitted to have the filters removed from the tool to increase the response time. I have not yet been provided a scheduled implementation date for the slow down fix, but I'll pass it on when I get it.

Thanks,
Debbie Gardner
Analyst - CLEC Interface Group
404-927-2175

DATE: 08/01/05 05:59:29
FEEDBACK ID: 1020
FIRST NAME: 40F14B90FD
LAST NAME: Mary Conquest
COMPANY: ITC^DeltaCom
PHONE: 256 382 5967
EMAIL: mconquest@itcdeltacom.com
ERROR DESC: Enter your feedback here
PROBLEM: PMAP keeps getting slower and we do not have access to the Completed/Cancelled BOPI report. We should be able to view these.

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Conquest, Mary (ITCD)

From: Sherwood, Suzy [Suzy.Sherwood@BellSouth.COM]
Sent: Tuesday, August 02, 2005 1:25 PM
To: mconquest@itcdeltacom.com
Subject: PMAP Feedback Request

Mary -

Just wanted to let you know that I have received your PMAP Feedback request and am in the process of investigating. I have learned that the slow response time may be due to the filter function, which I believe we are going to remove. Hopefully this will help with the response time. I will keep you posted on this one.

I have someone looking into why you cannot access your Completed/Cancelled BOPI report and will get back with you as soon as I hear back.

Thanks!

Suzy Sherwood
Data Analyst - CLEC Interface Group
404-927-4436
ssherwood@imcingular.com

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Thank You for your feedback

We appreciate your feedback! It will be routed to a support person as soon as possible. If you would like to provide additional feedback, please submit another feedback. Your feedback reference number is: 48F14B80FD

* required field.

Feedback Information:

Name:*

Mary Conquest

Company:*

ITC^DeltaCom

Phone:*

256 382 5967

Fax:

256 382 3936

Email:*

mconquest@itcdeltaco

Address:

7067 Old Madison Pike
Ste 400
Huntsville, AL
35806

Your Comments:

Enter your feedback here
PROBLEM: PMAP keeps getting slower and we do not have access to the Completed/Cancelled BOPI report. We should be able to view these.



Please hit submit button only once.

Confidential/Proprietary: Contains private and/or proprietary information. May not be used or disclosed outside the BellSouth companies except pursuant to a written agreement. PMAP Web Delivery 4.0.1425.28326

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PMAP System Error

There was a system error that occurred in the processing of your request.

The system has automatically dispatched an operator to correct the problem, please try your request later. We apologize for the inconvenience.

Confidential/Proprietary: Contains private and/or proprietary information. May not be used or disclosed outside the BellSouth companies except pursuant to a written agreement. Copyright 2002.

MVC

Exhibit 4

BELLSOUTH

BellSouth Telecommunications, Inc.
800 19th Street North
1283
Birmingham, AL 35203

John.Griffin@BellSouth.com

John Griffin
CWINS Support Manager

Phone (205) 714-0491
Fax (205) 321-3178

August 2, 2005

Mary Conquest
ITC^DeltaCom

Subject: RCA for service order N958B1H2

Dear Mary Conquest:

This letter is in response to your request for a Root Cause Analysis (RCA) concerning service order N958B1H2.

Service order N958B1H2 was part of a non-coordinated UNE-P to UNE-L bulk migration scheduled for conversion on July 19, 2005. The bulk consisted of 9 service orders, of which, four (4) required an outside dispatch while the remaining five (5) were converted to UNE loop by central office personnel. The Enhanced Delivery Initiative (EnDI) application provided mechanized "Go-ahead" notification messages to the CLEC on eight (8) of the nine (9) orders between 8:29 AM through 10:27 AM.

This specific service order required a dispatch to complete the conversion. The cutover and service order completion activity was concluded at 8:36 AM on the due date. At 2:30 PM, BST personnel monitoring EnDI provisioning reports observed that the order was still in pending status. A follow up was made, per their process, to ensure the order was loaded to be worked. During this follow up, it was discovered that the field conversion had been made earlier in the day, however, the electronic notification to port had not been sent to DeltaCom. BST personnel immediately sent a manual "Go-Ahead" email message to Brenda Lane of DeltaCom. A follow up was made at 5:30 PM to monitor the port activity for the telephone numbers and it was discovered that DeltaCom still had not activated a port message. A call was placed to the contact number provided by DeltaCom to advise that porting still had not occurred and that an activate message needed to be sent to NPAC. The five (5) numbers were ported at 5:34 PM.

On-going investigation indicates a system problem that was unique to this order. Efforts to replicate the error have not been successful. The system support administrators for all the involved systems are still actively pursuing investigation as to the root cause of the system problem. All other orders in that office for that day processed correctly.

Sincerely,
John Griffin
CWINS Support Manager

BellSouth
Customer Care

Conquest, Mary (ITCD)

From: Lane, Brenda (ITCD)
Sent: Friday, July 29, 2005 5:50 AM
To: Tucker, Randy (ITCD)
Cc: Conquest, Mary (ITCD)
Subject: FW: BellSouth - Late Go Ahead Notification

We just rec'd the BellSouth go-ahead notification on the non-coordinated PON for the 19th. This is the one that we didn't receive on the cut date.

Thanks

Brenda Lane
Manager
Account Coordination Team
256-264-1621
256-264-1060 Fax
blane@itcdeltacom.com

-----Original Message-----

From: Tech.Talk@BellSouth.com [mailto:Tech.Talk@BellSouth.com]
Sent: Thursday, July 28, 2005 5:32 PM
To: BLane@itcdeltacom.com; UNEL@itcdeltacom.com
Subject: BellSouth

BELLSOUTH --- Go-Ahead Notification

BellSouth has completed The transfer of the following circuit(s) to your facilities

Order Type and Number: N958B1H2
Due Date: 20050719
Wire Center: 423892

Exchange Carrier ID: 7727
Purchase Order Number: DLT5UNEL4136279A
Billing Account Number: 423 M10-3346

Local Serving Office: 423892
BellSouth Circuit Identification: 80.TYNU.510066 SC
Your Circuit Identification (if provided):

Local Serving Office: 423892
BellSouth Circuit Identification: 80.TYNU.510067 SC
Your Circuit Identification (if provided):

Local Serving Office: 423892
BellSouth Circuit Identification: 80.TYNU.510068..SC
Your Circuit Identification (if provided):

Local Serving Office: 423892
BellSouth Circuit Identification: 80.TYNU.510069..SC
Your Circuit Identification (if provided):

Local Serving Office: 423892
BellSouth Circuit Identification: 80.TYNU.510070..SC
Your Circuit Identification (if provided):

MVC

Exhibit 5

In light of these new procedures, we cannot conclude that the hot cut processes will be insufficiently scalable to handle those lines that are transitioned from UNE-P to UNE-L arrangements. Rather, any inadequacies in carriers' hot cut performance can be addressed through enforcement of interconnection agreements and, in the case of BOCs, complaints pursuant to section 271(d)(6).⁵⁷⁰

212. We find that these batch hot cut processes also help address concerns about service disruptions. In particular, some of these new batch hot cut processes offer competing carriers the ability to schedule hot cuts outside of normal business hours.⁵⁷¹ This increased flexibility provides the potential to reduce the risk that any delays or disruptions will come during a time of day when they are likely to be observed by mass market customers.

213. Further, the record reveals that these batch hot cut processes have lower NRCs. For example, the New York DPS has approved Verizon's new batch hot cut processes, adopting hot cut NRCs far below the \$185 per line cited in the *Triennial Review Order*.⁵⁷² Region-wide, BellSouth offers a batch hot cut process at a ten percent discount off of the applicable state-established hot cut NRC to account for the efficiencies gained by using a batch process.⁵⁷³ Qwest has also instituted a batch hot cut process that is available at prices below the TELRIC rates set by state commissions for individual hot cuts.⁵⁷⁴ SBC has implemented a variety of enhancements to its hot cut processes that will result in lower hot cut

(Continued from previous page)

(N.Y. DPS Aug. 25, 2004) (*New York Hot Cut Order*), cited in Verizon Comments at 113. We note, in contrast, that Verizon's ability to perform the necessary volumes of hot cuts in New York was a particular concern in the *Triennial Review Order*. 18 FCC Rcd at 17272, para. 469. Some states only initiated batch hot cut proceedings in response to the *Triennial Review Order*, and have not completed those proceedings. We emphasize, however, that regardless of the status of the state proceedings, each of the BOCs has adopted batch hot cut processes throughout its territory and has based its advocacy with regard to unbundled mass market local switching on the continued availability of these processes.

⁵⁷⁰ 47 U.S.C. § 271(d)(6).

⁵⁷¹ For example, Qwest designed its batch hot cut process to "perform [the physical cut over of the loops] in the[] early morning hours," as early as 3 a.m., to ensure "little or no disruption to the end users [sic] service and [to permit technicians to work] on frames in an efficient manner with little to no traffic on them." Qwest Comments, Attach. 1 at 35. BellSouth is in the process of adding new hot cut features including after hours and weekend hot cuts. See BellSouth Comments at 31-32. SBC also offers extended business hours during which hot cuts can be performed. See Kansas Commission Comments at 17. As part of Verizon's "project" process for large volumes of hot cuts, loops included in the project are typically cut over after normal business hours." *New York Hot Cut Order* at 16.

⁵⁷² Specifically, the New York Department set rates as follows: for a basic 2-wire line, \$42.36 for the initial line and \$29.42 for each additional line; for a basic 4-wire line, \$69.60 for the initial line and \$45.09 for each additional line; for each line in a "large job" hot cut, \$33.84 for the initial line and \$27.92 for each additional line; and for each line in a "batch" hot cut, \$28.17 for the initial line and \$23.72 for each additional line. *New York Hot Cut Order*.

⁵⁷³ BellSouth Reply at 24; see also BellSouth Comments at 34

⁵⁷⁴ Qwest Comments at 50. In most Qwest states, per-line batch hot cut rates are .5% to 16.8% less than the individual hot cut rates. Qwest Reply at 85.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been served upon the following this 16th day of August, 2005, by U.S. Mail:

Felicia R. Banks, Esq.
Staff Counsel
Florida Public Service Commission
Division of Legal Services
25430 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Andrew D. Shore, Esq.
Nancy B. White, Esq.
General Counsel
c/o Nancy Sims
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

R. Douglas Lackey, Esq.
Andrew D. Shore, Esq.
Suite 4300, BellSouth Center
675 W. Peachtree Street, NE
Atlanta, GA 30375


