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September 29, 2006

Via E-mail

Ms. Blanca Bayo
Florida Public Service Commission
2450 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: CLEC Response to Action Items 1-12
Docket No. 000121A

Dear Ms. Bayo:

Attached please find the CLEC Coalition's responses to action items 1-12 in the above-referenced docket.

Sincerely,

/s/Vicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/pg
Enclosures

cc: Parties of Record

Action Item 1:

Please provide a proposal for ramping-off a Force Majeure event and returning to SEEM remedies. At a minimum, the proposal should include the following factors: event severity, grace period (no payments), time-frame (modified payments), deadline for returning to full payment, and performance measures impacted.

Response:

Where a government authority declares all or part of the area served by a CO a "Disaster Area," BellSouth may file with the Commission a notification of a Force Majeure event for the COs so declared, then for SEEMs related to metrics other than OSS, Billing and Change Management (the "Unaffected Metrics"), provided the central OSS, Billing or Change Management infrastructure is not located in a Disaster Area, the following applies on a CO by CO basis:

(A) BellSouth shall not be required to make SEEMs payments for any metrics (other than the Unaffected Metrics) for services within areas served in "Red" status based on the color-coded designations defined by BellSouth's ECC and impacted WMCs (the "WMC Designation"),

(B) BellSouth shall not be required to make SEEMs payments for non-parity metrics (other than the Unaffected Metrics) for services within an "Orange" WMC Designation area, but for all parity metrics, BellSouth shall pay the prior six month (excluding any Force Majeure months) average for Tier I and Tier II remedies attributable to services in those "Orange" WMC Designation areas,

(C) BellSouth shall not be required to make SEEMs payments for non-parity metrics (other than the Unaffected Metrics) for services attributable to "Yellow" WMC Designation areas, but BellSouth shall pay all applicable SEEMs payments for parity metrics for all services attributable to those "Yellow" WMC Designation areas, and

(D) BellSouth shall be required to make all applicable SEEMs payments for all metrics for services within "Green" WMC Designations areas.

Notwithstanding the foregoing, if

(1) BellSouth installs any new services to any non-TSP end user in an area with a WMC Designation of Red, Orange or Yellow, the area shall automatically return to Green status for purposes of the foregoing or

(2) no area may have an individual WMC Designation of Red, Orange or Yellow for greater than thirty (30) days unless BellSouth requests and the Commission grants a variance for good cause shown. In reviewing a variance request, the Commission will consider the conditions of the serving area, whether BellSouth's efforts to restore operations and services to normal have been reasonable, when and whether government services have been restored in the service area, when and whether government has placed any restrictions on the free movement of persons and equipment, and any other relevant factors.

Unaffected Metrics	Non-Parity Metrics	Parity Metrics
<p>Section 1--OSS -- OSS-1, OSS-2, PO-2</p> <p>Section 2—Ordering— O-2, O-3, O-8, O-9, O-11, O-12.</p> <p>Section 5 –Billing— B-1, B-2, B-5, B-10</p> <p>Section 8—Change Management— CM-1, CM-3, CM-6, CM-7, CM-11</p>	<p>Section 3 Provisioning— P-7, P-7A P-7D P-11 P-13B P-13C P-13D</p> <p>Section 7 Collocation, C-3</p>	<p>Section 3 Provisioning— P-3, P-4, P-9</p> <p>Section 4-Maintenance and Repair— M-1, M-2, M-3, M-4, M-5</p> <p>Section-6, Trunk group performance— TGP-1</p>

Action Item 2:

Please provide data and any supporting analysis regarding Special Access concerns in support of proposal to add these measures to SEEM.

Response: The following analysis was conducted using the 12 month view of the SQM-PMAP results for September 2005 through August 2006.

#	Measure/Standards	Findings
SA-1	Percent FOCs Received within Standard ---DS0 >= 98.0% within 2 business days ---DS1 >= 98.0% within 2 business days ---DS3 >= 98.0% within 5 business days	DS0 failed--12 of 12 months---worst month-----23.30% DS1 failed--12 of 12-----worst-----24.70% DS3 failed--12 of 12-----worst-----30.63%
SA-2	FOC Receipt Past Due ---Percent FOC Receipt Past Due -- Without Open Query/Reject < 2.0 % FOC Receipt Past Due	DS0 failed--9 of 12 months-----worst month-----12.09%. DS1 failed--12 of 12-----worst-----12.29% DS3 failed--11 of 12-----worst-----15.15%
SA-3	Offered vs. Requested Due Date ---Percent Offered with CDDD (where CDDD => BellSouth Stated Interval) = 100%	DS0 Failed--12 of 12 months---worst month-----96.45% DS1 Failed--12 of 12-----worst-----97.41% DS3 Failed--11 of 12-----worst-----73.91%
SA-4	On Time Performance to FOC due date ---Percent On Time to FOC Due Date - With CNR Consideration = > 98.0 % On Time	DS0 failed---9 of 12 months-----worst month-----83.3% DS1 failed---12 of 12-----worst-----77.15% DS3 failed---8 of 12 times-----worst-----87.32%
SA-5	Days Late ---Average Days Late < 3.0 Days	DS0 failed 11 of 12 months-----worst month--18.57 days DS1 failed 11 of 12-----worst-----7.49 days DS3 failed 9 of 12 M-----worst-----12 days (No performance standard)
SA-6	Average Interval	DS0 CLECs worse 7 of 12 M.-worst----12.54 vs. 6.86 days DS1 CLECs worse 6 of 12 --- worst-----10.6 vs. 4.26 days DS3 CLECs worse 8 of 12 ----worst-----12.81 vs. 2.5 days

SA-7	Past Due Circuits ---Percent Past Due Circuits - Total BellSouth Reasons < 3.0 % > 5 days beyond FOC Due Date	(Sparse data) DS0 + DS1-----34 of 81 or 42% DS3-----3 of 5 or 60%f
SA-8	New Installation Trouble Report Rate ---< = 1.0 trouble reports per 100 circuits installed	DS0 failed 12 of 12 months-----worst month----- 8.24% DS1 failed 12 of 12-----worst----- 4.84% DS3 failed 7 of 12-----worst-----2.13%
SA-9	Failure Rate-Annualized --< = 10.0	Not reported according to SQM calculations
SA-10	Mean Time to Restore --- Below DS3 <= 2.0 Hours --- DS3 and Above <= 1.0 Hour	Below DS3 failed 12 of 12 months----worst-----5.22 hours DS3-----failed 12 of 12-----worst-----2.76 hours
SA-11	Repeat Trouble Report Rate --- Below DS3 <= 6.0% --- DS3 and Above <= 3.0%	Below DS 3 failed 12 of 12 months----worst-----22.53% DS3----- failed 8 of 12 months-----worst-----17.07%

Action item 3:

Please provide proposed revised language for Section 4.7.1 of the SEEM plan to specify that CLEC affiliate data should not be included in the calculation of Tier 1 aggregate and Tier 2 payments.

4.7 Affiliate Reporting

4.7.1 BellSouth shall provide monthly results for each metric for each BellSouth CLEC affiliate. Upon request, the Florida Public Service Commission shall be provided the number of transactions or observations for BellSouth CLEC affiliates. Further, BellSouth shall inform the Commission of any changes regarding non-CLEC affiliates' use of its OSS databases, systems, and interfaces.

4.7.2 BellSouth shall not include any BellSouth CLEC affiliate performance data in its calculation of retail aggregate, CLEC aggregate, Tier 1 aggregate, or Tier 2 performance reports and SEEM remedies calculations.

Action Item 4:

Please provide a proposal for expanding the Reason Codes for SEEM adjustments.

Following are the current adjustment reason codes:

IC	Inclement Weather
CR	Changed PSC Requirement
MC	Mitigating Circumstance
SE	Software Error
CE	Manual Calculation Error
DE	Data Error
TP	Triple Pay for Nacent Srvs.
RR	PARIS Re-Run
FM	Failure Month Count
SP	Sebsequent pass in a rerun
AB	Alternate Benchmark
RA	Adjustment to existing rmdy
NF	New failure in an rerun

Response:

First, for both the Transmitted Payments and Transmitted Balance Reports (for individual CLEC, Tier I and Tier II reports), include a column entitled Adjustment Code (Currently this column is only provided for individual CLEC reports). If the adjustment is associated with an RQ, use the RQ code, if not, use the appropriate existing adjustment code. Adjustments will be reported at the sub-metric level and each adjustment will be reported separately. For example, if a particular sub-metric was impacted by two adjustments in a given month, each adjustment would be reported as a separate line item on the PARIS report.

Second, a new monthly report will be included in the Exhibits section of the PMAP website. In this report, for each RQ or adjustment code reported as described above, the following information would be provided:

- RQ or Adjustment Code
- Description of reason for adjustment (e.g. if code DE, data error, were used, specifics regarding the error would be included.)
- Date Issue Opened
- Date Issue Corrected/Closed
- Month(s) and Year (s) affected by issue and therefore subject to adjustment.

Action Item 5:

Please provide proposed language to be added to the Glossary of the SQM that defines "valid business days" whereas parity will exist between wholesale and retail hours of operation.

Response:

Valid business days---Valid business days are Monday through Friday, excluding the following holidays: New Year's Day, Memorial Day, July 4, Labor Day, Thanksgiving, and Christmas, and any designated associated days, e.g., Friday after Thanksgiving. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ended on a weekend, or holiday, will be calculated with an end date of the last previous business day.

Hours of operation---Hours of operation are those hours during which BellSouth's operations in support of its CLEC customers are open and available to assist CLEC customers. BellSouth's hours of operation for CLEC customers will always be equal to the hours of operation supporting its retail customers. For example, if BellSouth's retail order center is operational ten hours per day, then the LCSC (s) should be operational and available to its CLEC customers ten hours per day. BellSouth will provide CLECs at least 30 days notice before making changes to its retail or wholesale hours of operation.

Action Item 6:

Please provide input regarding the possibility of locking in the intervals as reported in the Interval Guide in lieu of the Bellsouth proposal for retail analog/benchmarks for P-4 and only changing them upon annual reviews of the Performance Assessment Plan.

Response:

The CLECs agree that any changes to the minimum level of performance required from BellSouth for purposes of performance assessment should be done in the annual review. The Interval Guide should then be constructed in such a way that it conforms to those requirements, which should have the effect of locking in the maximum intervals BellSouth could provide the CLECs. (If Staff is asking for input regarding the possibility of using the Interval Guide as benchmarks, and using them in lieu of the retail analogs, the CLECs request more time to formulate a response).

Action Item 7

(a) Please provide data supporting the total number of non-mech orders submitted by facility based CLECs in support of proposed changes to P-11.

Response:

See Attachments 7-1, 7-2

(b) Please provide substantive evidence that non-mech orders are provisioned inaccurately.

Response:

CLECs have no substantive data responsive to this request.

Ordering

FOCC - Firm Order Confirmation and Reject Response Completeness

(% of LSRs responded to only once [FOC or Reject])

Numerator indicates the total number of service requests for which a Firm Order Confirmation or reject is sent

Volume indicates total number of service requests received in the reporting period

State	CLEC	OCN / ACNA	Product Group Description	Benchmark	BST Numerator	EST Volume	EST Metric	CLEC Numerator	CLEC Volume	CLEC Metric
FL	A		Fully Mechanized	95 %				288	288	100.00 %
FL	A		Local Interconnection Trunks	95 %			13	14	14	92.86 %
FL	A		Non-Mechanized	95 %			603	612	612	98.53 %
FL	A		Partially Mechanized	95 %			209	209	209	100.00 %

7-1

Florida, August 2006
Ordering

FOCC - Firm Order Confirmation and Reject Response Completeness
(% of LSRs responded to only once [FOC or Reject])

Numerator indicates the total number of service requests for which a Firm Order Confirmation or reject is sent
Volume indicates total number of service requests received in the reporting period

State	CLEC	OCN/ACNA	Product Group Description	Benchmark	EST Numerator	EST Volume	BST Metric	CLEC Numerator	CLEC Volume	CLEC Metric
FL			Fully Mechanized	95 %				245	246	99.59 %
FL			Local Interconnection Trunks	95 %	4			4	4	100.00 %
FL			Non-Mechanized	95 %	56			57	57	98.25 %
FL			Partially Mechanized	95 %	104			104	104	100.00 %

7-2

Contains private and/or proprietary information.
May only be used for authorized BellSouth business purposes
and only by authorized individuals.

Action Item 8

Please provide supporting data and quantify the number of rejected service request which were rejected in error.

Response:

See Attachment 8-1

Attachment 8-1
Invalid Rejections
One CLEC
August 21 - 31

DLT6UNE4259532B - Invalid circuit info
DLT6UNE4248039M - EUIM field needs to be populated and busy pairs
DLT6UNE4261909A - ACTL does not belong to Deltacom
DLT6UNE4261997A - Street name is not RSAG valid
DLT6UNE4264432A - Incorrect BI field being populated
DLT6UNE4266142A - Invalid BAN
DLT6UNE4258041A - ACTL does not match service address
DLT6UNE4266188A - Jack field wiring incorrect
BTM6UNE4260339A - Field name: LSPAUTH being incorrect
BTM6UNE4264881A - OCN incorrect
DLT6UNE4267289A - Incorrect addr field
DLT6UNE4264733A - Incorrect street name
BTM6UNE4260743A - Pairs provided are constrained
DLT6UNE4258041A - Service address invalid
DLT6UNE4266294B - BI1 & BI2 fields are incorrect
DLT6UNE4266294B - CCNA incorrect
DLT6UNE4259317B - Pair 93 incorrect or invalid
DLT6UNE4239532B - Loc being incorrect or not RSAG valid. Also, ACT type incorrect
DLT6UNE4260319A - LALOC & LASN fields
DLT6UNE4268497A - BAN incorrect
DLT6UNE4265205A - CCNA invalid or incorrect
DLT6UNE4257271C - AN field invalid
BTM6UNE4263876A - JK fields invalid
BTM6UNE4268009A - AN field invalid
DLT6UNE4264804A - Incorrect TOS
DLT6UNE4261218A - Busy pairs
DLT6UNE4268893A - Invalid BAN
BTM6UNE4261384A - Invalid cable ID
DLT6UNE4263828A - Invalid ACTL
DLT6UNE4260595A - Pending orders on 8642440446
DLT6UNE4260595A - BAN 1 & BAN 2

9/12 - 9/22

DLT6UNE4269282A - 0003 - Activity Type incorrect
DLT6UNE4269722A - 4410 - Circuit Information - Invalid
DLT6UNE4265990B - Other - TOS incorrect
BTM6UNE4268384A - 1203 - Service addr - Invalid
DLT6UNE4272816B - 1204 - Location - Missing or invalid
DLT6UNE4272855A - 3421 - Field format incorrect - Wiring
DLT6UNE4271929A - 0047 - BAN incorrect or invalid for number port
DLT6UNE4273203A - 0011 - AN field invalid or final
DLT6UNE4272855A - 1619 - IWBAN Invalid
DLT6UNE4267276B - Other - Pair 82 not available
DLT6UNE4273732A - 0064 - LOCQTY incorrect or invalid
DLT6UNE4271344A - 1203 - Service addr invalid or incomplete
DLT6UNE4265692A - 1623 - Field invalid or incorrect -Field name
DLT6UNE4265692A - 3421 - Field format incorrect - Wiring
DLT6UNE4265254A - Other - ACNA & CCNA does not match N - Account
DLT6UNE4264046A - Other - DFDT field incorrect
DLT6UNE4219562A - 0079 - OCN Incorrect & 0066 - Acct - Not found

Attachment 8-1
Invalid Rejections
One CLEC

BTM6UNE4259732A - L9745 - System unable to validate the ACA addr
DLT6UNE4270173A - 3407 - ECCKT - Invalid/Missing. ECCKT - Busy
DLT6UNE4272415A - 1203 - Service addr invalid or incomplete
DLT6UNE4273968A - 3421 - Field format incorrect - Wiring
DLT6UNE4273247A - 0087- BI1 & BI2 - Invalid/incorrect
DLT6UNE4274939A - 0087- BI1 & BI2 - Invalid/incorrect
DLT6UNE4273247A - 1201 - Street name - incorrect/or not RSAG valid
DLT6UNE4273650A - 3421 - Field format incorrect - Wiring
DLT6UNE4273305A - 3421 - Field format incorrect - Wiring
BTM6UNE4259781F - 0031 - LSO Invalid or incorrect
DLT6UNE4273073A - 0011 - AN field invalid or final
DLT6UNE4274771A - 1204 - Location - Missing or invalid/or not RSAG valid
DLT6UNE4274452A - 1203 - Service addr - Invalid or incomplete
DLT6UNE4275503A - 0011 - AN field - Invalid or final
DLT6UNE4274349A - 0087 - BI1 & BI2 - Invalid or incorrect
DLT6UNE4272849A - 0087 - BI1 & BI2 - Invalid or incorrect
DLT6UNE4274859A - 1201 - Street name - Incorrect/or not RSAG valid
DLT6UNE4270226A - Other - no description of error
DLT6UNE4273158A (Ver01) - TN 256-215-8025 on LSR but not on CSR
DLT6UNE4264569A - ACTL incorrect
DLT6UNE4261214A - L9745 - System unable to validate ACA addr

Action item 9

Please provide supporting data and quantify the number of service requests which were rejected multiple times in support of proposed measurement P-12B.

Response:

From one CLEC—

April 2006 –September 2006
All States

5082	Original LSRs
868	Version 1
245	Version 2
85	Version 3
32	Version 4
23	Version 5
7	Version 6
6	Version 7
1	Version 8
5	Version 9
1	Version 10
3	Version 15

Action Item 10

Please supply support of changing B-10 to 22 business days.

Response:

- a. CLEC need. Lengthy adjustment intervals cause additional work for CLECs, who must track and monitor existing adjustments to avoid duplicate requests, accruing expenses, etc. This problem is exacerbated by BellSouth's practice of delaying implementation of rate changes, causing CLECs to issue Billing Adjustment Requests (BAR) month after month due to BellSouth's incorrect billing. For example, for one CLECs's Florida ICA, which was effective 03-11-06, Bellsouth took two months (and it's been 3 for NC) to change billing. CLEC implemented the changes in one month after the signing of the ICA, causing disputes in FL on Collocation and Facility invoices. Disputes were denied by Bellsouth, stating rate change on invoices would take care of (this causes manual resolutions as the credits appear on the OCC). Once Bellsouth implemented the rate change for the ICA in FL on the invoices, credit and debits began appearing not back to the 3-11-06 effective date, but 3-11-05 (an extra year of credit or backbilling). This caused yet more manual work, as adjustments for the extra year of credit or debit had to be made in the CLEC audit system.

- b. BellSouth ability. A review of the attached material from BellSouth's web-site reveals that processing an accurately prepared BAR should be a relatively simple and straightforward process; even simpler if the request is submitted via the electronic BAR website (EBAR). BellSouth's web-site (http://www.interconnection.bellsouth.com/reference_library/guides/billing) also contains adjustment process flows. CLECs recommend that BellSouth be required to provide time frames for each process step. Finally, it is the opinion of the CLECs that frequently only a small part of the 60 days is used by BellSouth to actually work on the adjustment, but instead the adjustment languishes untouched by BellSouth employees.

1. When a carrier wants to dispute a charge, the appropriate dispute form must be completed. The Billing Adjustment Request (BAR) Form is used to dispute questionable service charges on a bill. Resale, UNE-P, DS0, UNE-L, and Q account disputes may be entered directly over the Internet at the electronic BAR (EBAR) website
2. When the dispute is received at the appropriate billing center, it notifies BellSouth that a charge is being disputed and provides the relevant information associated with the claim. To quickly and correctly resolve a billing dispute, it is important to submit a dispute to the correct Billing and Collections Center. EBAR disputes are automatically routed to the correct center., skip the next two steps.
3. Once the dispute form has been received by the correct center, it is assigned to a BellSouth service representative. The service representative processes the dispute form in the order in which it was received. To validate the dispute form, the service representative first reviews the form for completeness.
4. When the form passes the initial review, the dispute claim is sent to a service representative for further sampling and analysis. The fields on the dispute form are checked to verify that the information provided is accurate.
5. Once the dispute claim passes screening and sampling, the claim is logged in the appropriate tracking system. The service representative then assigns the tracking number provided by the carrier on the dispute form (if applicable) and enters it into the tracking system. EBAR disputes go directly to the tracking system.
6. The service representative sends an acknowledgment to the carrier with the tracking number and contact information for the group or representative who will process the dispute. Carrier receives immediate confirmation with the tracking number on EBAR disputes.
7. The dispute is passed on to the group or representative who will perform detailed analysis on the claim. The group or representative is responsible for performing the analysis on the dispute claim. All available information including contacts, customer service records and bills, are reviewed to determine the appropriate resolution to the dispute. In some cases, the group or representative may need to contact the carrier to clarify information provided on the dispute claim.
8. After performing analysis on the dispute, the group or representative determines if any billing records need to be updated based on BellSouth's acceptance of the claim.
9. Several resolution scenarios may occur based on the adjustment decision. Depending on the outcome of the investigation, the resolution scenario is one of the following:
 - a. Full Adjustment
 - i. If the outcome results in a full adjustment, the carriers bill is updated and the dispute is closed.
 - b. Partial Adjustment
 - i. If the outcome results in a partial adjustment, the carriers bill is updated and the status of the claim is updated to Partial. The carrier must concur with the decision before the claim is closed.
 - c. Deny the Claim
 - i. If the outcome results in the claim being denied, the status of the claim is updated to Denied. The carrier must concur with the decision before the claim is closed.
 - d. The group or representative notifies the carrier (via the dispute form) and updates the status of the claim to Closed, Partial or Denied in the appropriate tracking system. The group or representative is responsible for entering pertinent information on the dispute form and returning the dispute claim to the carrier via e-mail, facsimile or U.S. mail.
 - e. In the case of a Partial or Denied claim, the carrier must concur with the decision made by the group or representative.
10. If the carrier concurs with the decision made on the claim, the status of the claim is updated to Closed in the appropriate tracking system and the dispute is closed.
11. If the carrier does not concur with the decision of the claim, the claim is forwarded to the Billing Adjustment Request Manager (BARM) for further analysis and collection.

Action Items 11 and 12:

1. Please provide data in support of the number of change requests rejected for cost in CM-8.
2. Please provide supporting data for “out of scope rejections.
3. For CM-8, over the most recent one year period. Please provide a list of change requests rejected due to out of scope.

Type 5--Change Request Summary
CRs received since 07/19/05

Status	Amount	Comments
Cancelled-type 5	4	
Cancelled-type ?	1	
OS*	2	
Rejected**	9	
--Cost	4	
--Industry Standards	4	
--Tech. Feas.	1	
Implemented	5	Process changes only
Accepted/Held	3	
Awaiting CLEC response	3	
Total submitted	27	
% rejected of those subject to rejection	58%	Includes OS, R in numerator—OS, R, I, and AH in denominator 11 divided by 19

*Attached are these and other CRs refused as Out of Scope (from CCP website)

**Attached is a list of these and other CRs rejected by BellSouth (from CCP website)

Note: BellSouth’s 12 month aggregate PMAP report for CM-8 indicates that for the period of September 05 thru August 06, BellSouth rejected 7 of 13 CRs (47%). This report would not have included out of scope.

**CLEC Change Requests Submitted
(Excluding type 6-defects)
July19, 2005 to Present**

Date received	CR #	Type	CR Description	Disposition
07/19/05	2261	5	Electronic ordering	R-OS
05/01/06	2380	5	Reduce repair time	R-OS
10/19/05	2299	5	Prevent disconnects in error	R-cost
7/21/05	2262	5	Special Construction pre-authorization	R-cost
03/31/06	2364	5	RORD field with req types B and C	R-cost
	2390	5	Submitted by Sprint	R-cost
08/17/05	2271	5	Reduce DS1 Interval	R-Ind. Stan.
10/03/05	2294	5	Reduce DS1 Interval	R-Ind. Stan.
02/28/06	2351	5	Electronic migration LNP;	R-Ind Stan.
07/13/06	2400	5	EBD date on loss report	R-Ind Stan.
02/23/06	2347	5	Remarks in CSOTS	R- Tech Feas.
09/20/05	2290	5	Disconnects in Error - Establish Primary – Secondary end user process	I
01/12/06	2327	5	Mech/Hot cut/data (actual process only)	I
02/6/06	2340	5	Discontinuance of FAX/FOC on SOMAM	I
02/22/06	2348	5	Process change	I
02/23/06	2349	5	Process change/expedite disconnects in error	I
1/10/06	2326	5	Mech. Ordering process-BST 2 pack plan	AH
04/26/06	2378	5	Multiple company codes	AH
07/26/06	2406	5	Notification for non-coordinated hot cuts via PMAP.	AH
	2335	5	Pending clarification	
	2398	5	Waiting on customer direction	
	2414	5	Pending clarification	
11/22/05	2311	5	Update LENS not to auto-clar-----	CA
01/18/06	2331	5	Billing completion vs provisioning comp.	CA
	2345	?	Cancelled	CA
08/14/06	2415	5	Service Address on LNP to Resale LSR	CA
08/30/06	2423	5	Update NCI fields	CA

11-1



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> Change Control Process Out of Scope Change Requests

Change Control #	Description	Last Updated	Cha Pro
			» CC
CR2380	Business process change: Reduce the business repair interval line-sharing and line-splitting and standalone DSL services to 4 hours as implemented by BellSouth Small Business Services for their own DSL customers	09/14/2006	» Es Li » Pr
CR2261	BellSouth to support electronic ordering where the ACNA/CCNA on the LSR does not match the cable ID/ACTL	08/24/2005	» St
CR2218	Support Wireless OCN's for Reseller CSRs	05/16/2005	» TR
CR2031	Allow CLECs to provision redundant circuits into the BellSouth ordering systems to accommodate failover capabilities and not impact order processing in the case of a non-trivial circuit outage	09/15/2004	» Ty Ou
CR2020	Automated Single LSR Process for migration of ILEC retail voice to Line Splitting services	09/07/2004	» Ty No
CR2019	Automated Single LSR Process for migration of Line Splitting services	09/07/2004	Cha Pro » Ch Se
CR2018	Automated Single LSR Process for migration of Line Sharing Services to Line Splitting services	09/07/2004	» Fin Re
CR2017	Single LSR Process for loop splitting cross connects	08/27/2004	» Me
CR1908	Allow ADSL to be ordered over UNE-P lines. Also, allow the migration of current Resale accounts with ADSL to UNE-P. As per our current Interconnection Agreement for the State of Kentucky.	06/28/2004	Ad
CR1894	Bulk Migration process to include line share migrations	06/08/2004	
CR1892	BellSouth to perform ANI checks for Bulk Migrations	06/08/2004	
CR1889	Retail Local Service Freeze Edit	06/11/2004	
CR1733	Bulk Migration process to include CLEC to CLEC and line split migrations	06/02/2004	
CR1202	Request for Lines In Service Report	05/08/2006	
CR1080	BellSouth Service Outage Reporting	03/02/2005	
CR1017	CIA (Company Initiated Activity) Notification to CLECs	05/08/2006	
CR1013	Automated CNAM Error Reporting via EDI/Connect: Direct	05/08/2006	
CR0959	Directory Listing Process "Order To Book"	05/08/2006	

Change Control Process Rejected Change Requests

Change Control #	Description	Last Updated	Change Process
CR2400	EBD Date on Loss Report	08/04/2006	CC
CR2364	RORD FIELD WITH REQUEST TYPEs B and C	04/20/2006	CC
CR2351	Allow the migration of LNP to Resale/UNE Switched Combo Migrations to be done electronically and allow the interval to match that of Resale/UNE Switched Combo to LNP for Non-Complex services	03/17/2006	CC
CR2347	RMKS in CSOTS	03/14/2006	TR
CR2299	BellSouth to prevent Disconnects in Error by adopting process used by the rest of the industry (Verizon, Qwest, SBC) for abandoned station confirmation	11/04/2005	TY
CR2294	Reduce Interval for DS1 Local Loop with CFA DS3 MUX	10/19/2005	TY
CR2271	Reduce Interval for DS1 Local Loop with CFA DS3 MUX	08/31/2005	CC
CR2262	Special Construction Pre-Authorization Process	12/21/2005	CC
CR2252	Enhancements to CSOTS	07/07/2005	CC
CR2233	Disconnect Multi-Ring on LNP and NT requests	06/14/2005	CC
CR2209	Unwarranted BellSouth Address Editing on REQTYP JB	04/28/2005	CC
CR2198	Need the ability to Sup 01 or Sup 04 on Req Typ E, F and M	04/13/2005	CC
CR2196	Allow CLECs to have access to the service orders generated during CAVE Testing for Releases	04/08/2005	CC
CR2192	Self Certification Data Field Request rejected due to cost and Industry Standard	04/01/2005	CC
CR2180	PMAP Notification Tool for Non-Coordinated Migrations Notif Report Rejected - Out of Scope for CCP	03/24/2005	CC
CR2176	Parse out the LSP ID into an individual field on CSR via EDI	03/21/2005	CC
CR2136	CSOTS display of orders entered in SOEG	01/28/2005	CC
CR2130	Establishment of Default Ban Codes	01/25/2005	CC
CR2125	CSOTS functionality for LNP orders	01/05/2005	CC
CR2077	FID RCU TWC and USOC ESC-WT Present on BST Retail CSR	11/10/2004	CC
CR2064	Requesting the appearance on the customer service record for call forwarding numbers associated with GCE, GCJRC and GCJ for verification purposes	11/04/2004	CC
CR2055	LENS - Manual LSR Forms	10/05/2004	CC
CR2042	Would it be possible to setup the LENS and CSOTS websites to	09/23/2004	CC

	support Mozilla Firefox browser?	
CR2032	Change in BellSouth's Interval Guide to have a standard interval for BellSouth's return of FOCs where current interval is negotiated	09/15/2004
CR2030	Request electronic method for sending subsequent orders upon receipt of the provisioning completion notice from BellSouth	01/17/2005
CR2029	Ability to send ranges of TNs via EDI for all Reqtype C request	09/15/2004
CR2028	Enhance LENS with the option to cancel a disconnect recording	09/15/2004
CR1938	LENS BULK ordering Activity Types for Reqtype E (Resale)	07/14/2004
CR1937	LENS BULK ordering Activity Types for ReqType M (Port/Loop Combination)	07/14/2004
CR1893	BellSouth Bulk Migration Process to include Retail customers	06/08/2004
CR1888	Sequence of Orders	06/02/2004
CR1739	Increased flow-through for Bulk Migrations	06/02/2004
CR1738	BellSouth to test Bulk Migration process prior to CLEC implementation	03/11/2004
CR1735	Bulk Migration Restoral Process	06/02/2004
CR1734	Scheduling Bulk Migrations	06/16/2004
CR1666	Requesting the ability to migrate LNP to UNEP via LENS	02/02/2004
CR1633	Revised process for viewing Resale/UNE-P CSRs (Customer Service Records) and DL CSRs for facility-based providers	05/27/2004
CR1614	LENS to be enhanced to extend the length of time LSRs are stored	02/09/2004
CR1457	Request for a revision to Carrier Notification SN91083774	11/17/2003
CR1422	We need the ability via LENS, TAG, and EDI to remove a Local Service Freeze (LSF) on a denied account without the service restored	11/12/2003
CR1375	Extend the PON AGED-OFF window to 60 Days	04/12/2004
CR1374	AT&T requests Removal of BST edits (systems and/or M&P driven) requiring that all company identifying codes on the LSR forms be from one company name	09/30/2003
CR1310	LENS Administration of User ID's	05/08/2006
CR1275	Business Saver Service	12/03/2003
CR1258	Expand CAVE to support increased CLEC testing of Encore release versions	07/24/2003
CR1256	Provide Electronic Ordering for Ordinarily Combined UNE Combinations	06/27/2003
CR1222	We need the ability to sup a restore or deny order and change a due date via Tagxml	06/13/2003
CR1185	LENS-Request to view LSR History	09/16/2003
CR1180	Remove a DL Field in LENS	05/13/2003
CR1165	Requesting increased intervals for TC Opt/Referral Recording Messages	05/01/2003
CR1161	List LEO Edit requiring SUP to be created in same system as initially created	09/16/2003

CR1154	Voice Mail S98AF	04/18/2003
CR1148	TOS T	04/15/2003
CR1141	Term Agreement Parity	04/03/2003
CR1097	Prohibit suspend/deny orders from completing when not same LSP/AEC	04/23/2003
CR1062	Bulk Order Ability in UNE-P	08/06/2004
CR1024	Implement a Single C Order Solution for Partial Conversion to UNE P	03/04/2003
CR1021	EELS Flowthrough	06/03/2003
CR0998	Re AT&T Requests that BST Stop Requiring CLECs to tell BST the Disposition of the BST Facilities/Pipe for REQ TYP C Orders.	01/17/2003
CR0964	Centrex - Mechanized Provisioning & Flow Through	11/13/2002
CR0954	Request for Standard Interval for Porting Up to 100 TNs from Complex BST Services	01/27/2003
CR0790	Lens Data Extract	06/18/2003
CR0717	CLEC Access to All Pending Orders	11/13/2002
CR0378	UNE via ASR21 (formerly ORD030200_001)	11/13/2002
CR0132	Fielded Completions	11/13/2002