

1 **SPRINT COMMUNICATIONS COMPANY, LIMITED PARTNERSHIP**
2 **SPRINT METROPOLITAN NETWORKS, INC**
3 **DIRECT TESTIMONY OF MILDRED A. GRAHAM**
4 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
5 **DOCKET NO. 971314-TP**
6 **JANUARY 16, 1997**

7
8 **Q: PLEASE STATE YOUR NAME AND ADDRESS.**

9
10 **A: My name is Mildred A. Graham. My business address is 555 Lake Border Drive,**
11 **Apopka, Florida 32707.**

12
13 **Q: BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

14
15 **A: I am employed by Sprint as General Communications Manager.**

16
17 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK**
18 **EXPERIENCE.**

19
20 **A: I have a Bachelor of Science degree from Florida A&M University in Tallahassee,**
21 **Florida. I have been employed by Sprint for five years, beginning as Staff Editor**
22 **of the employee newsletter. In 1994, I served as a Quality/Process Improvement**
23 **Team Member, responsible for streamlining the phone directory process and**
24 **identifying avenues to market directory services as a product. As Manager of**
25 **Internal Communications in 1995, I directed executive-to-employee**

1 communications. I was named Residential Service Center Manager in 1996, a
2 role that required managing the group responsible for resolving customer
3 installation problems. In April 1997, I was hired as the Single Point of Contact
4 (SPOC)/Customer Service Manager for Sprint's ALEC in Florida, Sprint
5 Metropolitan Networks, Inc. (SMNI), becoming immediately involved in the
6 process of ordering and provisioning unbundled loops from BellSouth. In June
7 1997, I assumed direct supervision of the SPOC team, the workgroup responsible
8 for negotiating conversion dates with customers, issuing the unbundled loop
9 orders to BellSouth, and then coordinating customer conversions through to
10 installation. I continued in that role through December 1997. My current position
11 as General Communications Manager became effective Jan. 1, 1998. In this
12 capacity, I manage the group that coordinates executive communications,
13 employee communications and media relations for Sprint in Florida
14

15 Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?
16

17 A: The purpose of my testimony is to provide the Florida Public Service Commission
18 with historical information as well as specific examples of Sprint's past and
19 continual problems related to BellSouth's process for ordering and provisioning
20 unbundled loops. My testimony is directly related to the complaint filed with the
21 FPSC by Sprint Communications Company Limited Partnership and SMNI
22 against BellSouth Telecommunications, Inc.
23

24 Q: DOES YOUR TESTIMONY ADDRESS THE SPECIFIC ISSUES IDENTIFIED BY
25 THE COMMISSION IN THESE PROCEEDINGS?

1 A: Yes, my testimony addresses Issues No. 1 through 4.

2

3 Q: WHAT COMMENTS DO YOU HAVE REGARDING ISSUE NUMBER ONE:

4 "HAS BELLSOUTH PROVIDED FIRM ORDER CONFIRMATION IN A TIMELY
5 AND ACCURATE MANNER AS AGREED TO BY BELLSOUTH AND SMNI?"

6

7 A: BellSouth has not provided Firm Order Confirmation (FOC) within the agreed
8 upon 48 hour-period. Data collected from April through December 1997, Exhibit
9 MAG-1, notes that only 5 percent of the FOCs were returned from BellSouth
10 within the 48-hour commitment in April; 50 percent in May; 27 percent in June;
11 60 percent in July; 54 percent in August; 58 percent in September; 90 percent in
12 October; 82 percent in November; and 64 percent in December.

13

14 Receiving even one FOC after the 48-hour time period can be devastating to
15 SMNI's efforts to provide service to its customers.

16

17 Q: WHAT PROCESS WAS USED TO GATHER THIS INFORMATION?

18

19 A: This information was extracted from two performance measurement sources. Our
20 Single Point of Contact team members, under my supervision, direction and
21 control, maintain a spreadsheet that tracks Sprint's installation process by
22 customer name and Purchase Order Number (PON). Among the elements
23 captured on this document are the date the Access Service Request (ASR) is
24 submitted to BellSouth and the date the FOC is received by Sprint. An ASR acts
25 as a service order request from Sprint to BellSouth; it contains the PON,

1 features ordered, central office location, type of service, quantity of loops and
2 desired installation date. Because the 48-hour commitment is critical to Sprint's
3 installation process, the actual ASR to FOC intervals are pulled from this
4 spreadsheet, then reported and analyzed as part of the weekly, key performance
5 measures. These key measures are used to track internal and external
6 performance and document various aspects of the request-to-installation interval
7 as well as the trouble resolution process.

8
9 Q: WHY ARE TIMELY AND ACCURATE FOCs IMPORTANT?

10
11 A: When BellSouth does not return timely FOCs, the SPOC team members must
12 repeatedly phone BellSouth for a status. This additional burden of making follow-
13 up calls regarding FOCs is costly as it is an unnecessary waste of valuable time
14 and resources. For example, the typical follow-up call regarding an FOC may
15 involve placing the call, being put on hold for approximately five minutes, then
16 being told that a response call will be provided. Often, when BellSouth neglects to
17 return those calls the SMNI associates are required to make subsequent calls on
18 that same day or the next day.

19
20 The FOC acknowledges that BellSouth has received the ASR and that it can or
21 cannot meet the desired due date. Without the FOC, Sprint cannot confirm that it
22 can meet the due date.

23
24 Sprint requires key information on the FOC - including the circuit identification
25 and BellSouth order number - to begin its internal process of placing orders and

1 coordinating activities to move the customer from BellSouth's network to ours. If
2 Sprint receives the FOC late, the internal process begins late and it becomes
3 difficult - and nearly impossible - to meet the customer's desired due date. Each
4 additional step required for a successful cutover then must be hurried. Any
5 unexpected glitch discovered by either Sprint or BellSouth may force Sprint to
6 extend the due date, resulting in a missed commitment or delayed cutover for the
7 customer.

8
9 Q: WHAT IMPACT DO DELAYED CUTOVERS HAVE ON SMNI CUSTOMERS?

10
11 A: Delayed cutovers frustrate customers, sometimes causing them to question
12 Sprint's ability to deliver quality customer service. Because most customers have
13 no history of working with this new division of Sprint, it is difficult to maintain
14 credibility with new customers when we have to extend due dates.

15
16 Some medium- and large-business customers employ telephone equipment
17 vendors, such as WilTel. Others use out of town vendors such as America II
18 Communications, a Tampa firm which represented one of our customers, as well
19 as communications consultants, including one who represented this same
20 customer and was based out of California. For these types of customers, delayed
21 cutovers require a great deal of schedule changes. These customers often must
22 adjust the workload and other operations to prepare for the out-of-service or
23 "down" time required for cutovers. Adjusting the business a second time to
24 accommodate a new due date can be distressing to customers.

1 Q: DO DELAYED CUTOVERS AFFECT SPRINT'S BUSINESS AND ABILITY TO
2 COMPETE?

3
4 A: Yes, delayed cutovers negatively affect Sprint's ability to compete in the
5 marketplace. Because we have so little confidence that BellSouth will return
6 timely FOCs, we must negotiate extended due dates to accommodate expected
7 delays in the process. Such up-front discussions between the customer and
8 Sprint's sales team place our company at an unfair disadvantage. Our account
9 executives have complained that it is difficult to win new customers when they
10 are forced to explain that it will require several weeks to convert their service to
11 Sprint.

12
13 Q: HAS BELL SOUTH TAKEN ANY ACTIONS TO IMPROVE ITS PERFORMANCE
14 WITH REGARDS TO FOC COMMITMENT TO SPRINT?

15
16 A: Yes, it is Sprint's understanding that BellSouth has added staff and has
17 introduced its electronic system, Exchange Access Tracking Control (EXACT), to
18 Sprint for use in processing local loop orders in an attempt to reduce processing
19 delays. However, BellSouth continues to fail to provide timely and accurate FOCs.

20
21 Sprint uses EXACT to transmit local loop orders to BellSouth in the form of
22 electronic ASRs. The FOC is transmitted back to Sprint via EXACT, however,
23 because of downloading restrictions, Sprint can not actually view the FOCs for
24 several hours after BellSouth enters the FOCs into EXACT. That means that
25 BellSouth may claim that they entered an FOC into EXACT at noon, but Sprint

1 may not be able to see it until the next working day.

2

3 Q: WHAT COMMENTS DO YOU HAVE REGARDING ISSUE NO. 2: "HAS
4 BELLSOUTH IDENTIFIED PROVISIONING PROBLEMS IN A TIMELY
5 MANNER TO ENABLE SPRINT TO MEET CUSTOMER DUE DATES AT
6 PARITY WITH THE SERVICE PROVIDED BY BELLSOUTH TO ITS RETAIL
7 CUSTOMERS?"?

8

9 A: BellSouth has repeatedly failed to inform Sprint of facility problems in a timely
10 manner, resulting in Sprint missing its customer desired due dates. Exhibit
11 MAG-2 features several examples of BellSouth failing to identify sites where
12 facility upgrades are required prior to the installation of services requested by
13 Sprint.

14

15 Q: ARE THERE SPECIFIC EXAMPLES OF BELLSOUTH'S FAILURE TO
16 IDENTIFY FACILITY PROBLEMS IN A TIMELY MANNNER RESULTING IN
17 SPRINT MISSING DUE DATES?

18

19 A: In addition to the examples cited in Exhibit MAG-2, there are several instances of
20 BellSouth notifying Sprint of facility issues as late as the day before the scheduled
21 cutovers. For example, BellSouth notified Sprint on August 8, 1997 of a lack of
22 facilities for a customer conversion scheduled for the next business day, August
23 12, 1997. The conversion took place on August 15, 1997. These late notices came
24 after BellSouth issued FOCs to Sprint, which seemed to indicate that BellSouth
25 had agreed to provision an order without first confirming the availability of

1 facilities.

2

3 In one instance, when BellSouth notified Sprint that facility problems would
4 require changing the due date, the customer refused to accept the new date. The
5 customer was anxious to take advantage of new prices and services so Sprint and
6 BellSouth teams had to expedite their processes to provide the service on the
7 newly-negotiated due date.

8

9 Q: HOW DOES BELLSOUTH'S FAILURE TO NOTIFY SPRINT OF
10 PROVISIONING PROBLEMS IN A TIMELY MANNER AFFECT SPRINT'S
11 ABILITY TO DELIVER QUALITY SERVICE TO ITS CUSTOMERS?

12

13 A: When BellSouth notifies Sprint of facility issues at the last minute, Sprint must
14 contact the customer to reschedule the cutover. Because Sprint is making
15 customers aware of the due date change so close to the original due date, Sprint
16 loses credibility with customers. In addition, late notifications increase customers'
17 costs to convert to Sprint because internal employees and other vendors will have
18 been scheduled around the original due date.

19

20 Customers also are inconvenienced because they have generally scheduled their
21 business operations and made work activity changes to accommodate the initial
22 due date.

23

24 For example, Customer "A" was planning to move into a new facility on the
25 conversion date, August 11, 1997, but because of facility problems identified one

1 business day before the cutover date, the move had to be rescheduled until after
2 the actual conversion, four days later.

3
4 **Q: HAS SMNI COMMUNICATED ITS CONCERNS REGARDING FACILITY
5 PROBLEMS TO BELLSOUTH?**

6
7 **A:** Sprint has communicated its concerns regarding FOC problems to BellSouth by
8 discussing the issue directly with operations managers at BellSouth in phone
9 conversations. In addition, I have relayed these concerns to the Sprint account
10 team and requested - and held - conference calls to address the late notification
11 of facility problems.

12
13 **Q: HAS BELLSOUTH IMPROVED ITS PROCESSES TO ALLOW SPRINT TO BE
14 NOTIFIED SOONER OF FACILITY PROBLEMS?**

15
16 **A:** No. BellSouth has responded to correspondence and discussions regarding facility
17 problems via conference calls with assurances of improvement. BellSouth also
18 introduced in October 1997 a new order confirmation tariff for access orders
19 (typically placed by inter-exchange carriers) that Sprint hoped could be used to
20 help identify facility problems with unbundled loop orders as well. The tariff filing
21 offered customers the option of receiving a POC (Pending Order Confirmation), in
22 addition to receiving an FOC. The POC would acknowledge receipt of the ASR
23 and provide key information that Sprint needs to begin its internal process prior
24 to the issuance of the FOC. The FOC would give the same information in
25 addition to providing critical dates. But the FOC would be sent only after facility

1 availability has been verified.

2

3 Sprint agreed to implement this new process and BellSouth promised activation in
4 early December. Sprint also asked that the POC offer be broadened to include
5 unbundled loop orders, which account for the majority of Sprint's service requests
6 to BellSouth. As of Jan. 9, 1998, BellSouth had not implemented this new process
7 for access orders and it still had no clear answer as to its applicability to
8 unbundled orders.

9

10 Q: WOULD THIS NEW TYPE OF CONFIRMATION HELP SPRINT MEET ITS
11 DUE DATES?

12

13 A: Yes. However, up until now, BellSouth has offered no means of verifying facilities
14 to Sprint. BellSouth has traditionally issued FOCs prior to confirming facilities or
15 held FOCs until facility problems were identified and/or resolved. In either case -
16 late notice of a facility problem or late issuance of an FOC - Sprint is forced to
17 delay its ordering process. In fact, BellSouth claims that the company is not
18 required to provide FOC on access orders with due dates of four days or less.
19 Therefore, Sprint receives its critical information at random, yet unacceptable
20 intervals, while still not receiving facility verification on these orders.

21

22 If Sprint received a POC, we would have the information required to begin the
23 internal ordering process in a timely fashion. The POC would include information
24 such as the circuit identification and BellSouth order number, which Sprint uses
25 on its internal service orders to cross reference information and ensure a smooth

1 cutover. Having received the POC first, when Sprint received the FOC, we could
2 be assured that facilities were available. Adding POCs will give FOCs more value
3 and validity.

4
5 Q: HAS BELLSOUTH BEEN RELUCTANT TO PROVISION SPRINT ORDERS
6 WHERE CERTAIN NETWORK EQUIPMENT CONFIGURATIONS EXIST?

7
8 A: Yes, BellSouth has been reluctant to provision orders where three network
9 configurations exist. I will address one of those situations.

10
11 One network configuration for which BellSouth was reluctant to provision orders
12 was the Digital Access Cross-Connect mapped Integrated Subscriber Line
13 Concentrator (SLC) Facilities. This equipment is used to maximize the use of
14 physical facilities extending to customer premises. BellSouth had utilized this
15 equipment to provision local service to a private dormitory. When Sprint placed
16 orders to convert the customers' service reusing the existing facilities, BellSouth
17 responded that its systems and processes did not support the reuse of those types
18 of facilities. In addition, BellSouth was reluctant to process the orders manually
19 because it might set a precedent for provisioning competitive services with non-
20 standard procedures. After this issue was escalated to BellSouth's executives, the
21 customers' service was provisioned.

22
23 However, that was more than a month after the requested due date. At that
24 point, the customer had become irate because we had inconvenienced him and his
25 business. In addition, the customer complained that the delayed cutover was

1 costing him money because he was continuing to pay higher rates for his existing
2 service. Because the installation process was so lengthy, the customer demanded a
3 credit on his account to compensate him for the additional expenses he incurred
4 while waiting to convert. This customer's frustrations are shown in an affidavit
5 highlighted in Exhibit MAG-3 attached hereto.

6
7 **Q: WHAT COMMENTS DO YOU HAVE REGARDING ISSUE NO. 3: "HAS**
8 **BELLSOUTH DISCONNECTED CUSTOMERS SEEKING TO MIGRATE TO**
9 **SPRINT SERVICE PRIOR TO THE DESIGNATED CUTOVER DATE?"**

10
11 **A: On numerous occasions, BellSouth has been unable to stop its service**
12 **disconnection process when customer cutovers have been delayed. As a result,**
13 **customers have been prematurely disconnected, effectively putting them out of**
14 **business until the service is restored.**

15
16 **Q: DO YOU HAVE SPECIFIC EXAMPLES OF BELLSOUTH PREMATURELY**
17 **DISCONNECTING CUSTOMER'S SERVICE AFTER THE CUTOVER HAD**
18 **BEEN RESCHEDULED?**

19
20 **A: Yes, I do. One customer was scheduled to be converted in May 1997, but on that**
21 **day BellSouth notified Sprint of the need to reschedule the due date. However,**
22 **BellSouth did not revise the due date on its orders and the customer's service was**
23 **disconnected later that day. BellSouth claimed the service was restored that night.**
24 **But the customer called Sprint the next day stating that some lines were still out**
25 **of service and others were not functioning properly. The lines had been restored**

1 to the wrong office equipment and one line had a broken jumper on the frame.
2 BellSouth finally restored service to its original configuration two days later.

3
4 There were several incidents of BellSouth taking customers out of service in error
5 then improperly restoring that service in the April/May 1997 timeframe. On May
6 23, 1997, for example, BellSouth prematurely disconnected three lines of one
7 particular customer and the customer was without service for more than eight
8 hours. When service was restored, the trunk lines were not properly installed; the
9 customers' service did not function properly for three days.

10
11 BellSouth also prematurely disconnected a customer's lines on May 29, 1997 after
12 delaying the cutover because of provisioning problems within BellSouth. The
13 customer's lines were restored June 3, 1997. However, BellSouth disconnected
14 the customers' lines again the very next day.

15
16 Q: HOW HAVE THESE PREMATURE DISCONNECTS AFFECTED SPRINT'S
17 CUSTOMERS?

18
19 A: Premature disconnects disrupt customers' business, causing a loss of productivity.
20 As compensation for the loss of business, some customers who have been
21 inappropriately disconnected have requested account credits. One customer
22 indicated that the premature disconnect led to him compensating his customers
23 for the inability to use the phone for several hours. While Sprint could not
24 provide a loss of business credit, we did authorize a "good faith" credit that
25 amounted to \$3,000. Two incidents of premature disconnects even contributed to

1 one new Sprint customer returning to BellSouth.

2

3 **Q: WHY HAVE CUSTOMER CUTOVERS BEEN DELAYED?**

4

5 **A:** In most cases, customer cutovers were delayed because of BellSouth's late notice
6 to Sprint of facility or engineering problems. Even if a customer changed the due
7 date at the last minute, that customer's service should not be disconnected in
8 error.

9

10 **Q: HAS SPRINT BEEN FORCED TO REDUCE THE VOLUME OF ORDERS**
11 **PLACED TO BELL SOUTH DUE TO THE RISK OF CUSTOMERS BEING**
12 **DISCONNECTED PREMATURELY?**

13

14 **A:** Yes. Sprint recently has reduced the volume of orders placed to BellSouth in part
15 because of the risk of such problems. In addition, Sprint is taking a more direct,
16 hands-on approach to further attempts to manage the ordering process. For
17 example, several calls are made to BellSouth's operations groups to remind
18 BellSouth to change its orders if a due date has to be delayed just before the
19 scheduled conversion. Phone calls are also made by Sprint to attempt to confirm
20 that the disconnect orders have been pulled out of BellSouth's system.

21

22 **Q: HAVE YOU BEEN ADVISED OF ANY PERMANENT PROCESS**
23 **IMPROVEMENTS IMPLEMENTED BY BELL SOUTH TO ENSURE THAT**
24 **CUSTOMERS ARE NOT PREMATURELY DISCONNECTED?**

25

1 A: No. If BellSouth has made such process improvements, I have not been made
2 aware of them. However, BellSouth already has processes in place - as outlined in
3 the Interconnection Agreement - to allow for the rescheduling of customer
4 cutovers during a 60-minute interval. As part of the rescheduling process,
5 BellSouth should have a procedure that ensures that disconnect orders can be
6 stopped, if necessary.

7
8 Q: WHAT COMMENTS DO YOU HAVE REGARDING ISSUE NO. 4: "HAS
9 BELLSOUTH CAUSED SERVICE INTERRUPTIONS TO SPRINT CUSTOMERS
10 DUE TO CALL ROUTING ERRORS, TRANSLATIONS PROBLEMS OR
11 FAILURE TO PROPERLY IMPLEMENT INTERIM NUMBER PORTABILITY??"

12

13 A: There have been numerous service outages that have resulted in the inability of
14 Sprint's customers to receive or make calls.

15

16 Q: ARE THERE SPECIFIC EXAMPLES OF SERVICE INTERRUPTIONS?

17

18 A: Yes, there are. On May 19, 1997, callers trying to reach Sprint customers received
19 an "all circuits busy" condition for three hours. BellSouth had begun
20 implementing a trunking reconfiguration project designed to enhance capacity
21 between the two networks. However, BellSouth reversed the routing in error,
22 resulting in a number of trouble tickets at Sprint.

23

24 On May 30, 1997, more than seven hours passed before BellSouth could identify
25 and correct a translation problem that caused calls which overflowed to a

1 secondary transmission route to reach a recording stating, "This number is no
2 longer in service" and "This number cannot be completed as dialed."

3
4 On June 6, 1997 calls made to Sprint were blocked for more than two hours
5 because a Simulated Facilities Group (SFG) that contains network instructions for
6 Local Number Portability was inadvertently taken out of service. An identical
7 problem with the SFG occurred on June 24, 1997, affecting all customers served
8 with number portability out of BellSouth's Magnolia central office switch in
9 Orlando.

10
11 Q: HOW HAVE THESE SERVICE INTERRUPTIONS AFFECTED SPRINT'S
12 CUSTOMERS?

13
14 A: As referenced in customer-prepared affidavits identified as Exhibits MAG-4 and
15 MAG-5 attached to the complaint, service outages have caused our customers the
16 greatest degree of dissatisfaction. One reason is because of the length of some of
17 the outages, which crippled their businesses. Another reason the service
18 interruptions were so upsetting, according to at least two customers is that they
19 were never experienced prior to converting to Sprint.

20
21 In an effort to recover customers' confidence following outages, we have written
22 letters of apologies and issued credits to customer accounts. For one customer,
23 though, the multiple service interruptions proved to be too damaging to the
24 business. The customer switched back to BellSouth after having been the victim
25 of outages caused by number portability and call routing problems.

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One service interruption even affected a customer before being converted to Sprint. While technicians and other BellSouth staffers were attempting to correct the June 6, 1997 problem with the SFG, they prevented the provisioning group from gaining access to the switch to complete a new customer conversion. As a result, the last step of the cutover for the customer was delayed nearly two hours. Because the conversion was delayed for an additional period, the customer's out-of-service time was extended. Likewise, Sprint incurred additional costs for the staff that was obligated to the conversion conference call while the service outage was being rectified.

Q: WERE THESE SERVICE OUTAGES CAUSED BY BELLSOUTH?

A: Yes, these service problems were strictly related to BellSouth issues. There was nothing Sprint could have done to avoid these service outages.

Q: HAS BELLSOUTH TAKEN ANY STEPS TO PREVENT SUCH OUTAGES IN THE FUTURE?

A: Through correspondence, BellSouth has mentioned training and software upgrades as steps they would take to minimize the risk of a recurrence of the SFG problem. While we are confident that BellSouth has implemented more training of its staff, it is unclear how effective that training has been. We have not been apprised of any software upgrades by any vendors.

1 Q: WHAT COMMENTS DO YOU HAVE REGARDING ISSUE NO. 5, "HAS
2 BELLSOUTH PROVIDED INSTALLATION INTERVALS FOR SERVICE
3 ESTABLISHED VIA UNBUNDLED LOOPS IN ACCORDANCE WITH THE
4 INTERCONNECTION AGREEMENT WITH SMNI??"

5

6 A: SMNI's Interconnection Agreement states in Section IV.D.1, "Installation intervals
7 for service established via unbundled loops will be handled in the same timeframe
8 as BellSouth provides services to its own customers, as measured from date of
9 customer order to date of customer delivery." Although SMNI has not been
10 provided information by BellSouth on what installation intervals are achieved for
11 BellSouth's own retail customers, SMNI's experiences with the service installation
12 process with BellSouth lead to the conclusion that it is unlikely that SMNI
13 customer intervals meet this standard.

14

15 Q: WHAT FACTORS INFLUENCE SMNI'S ESTABLISHMENT OF
16 INSTALLATION INTERVALS FOR INDIVIDUAL SERVICE ORDERS?

17

18 A: BellSouth has provided SMNI with standard intervals for the provision of
19 unbundled loops. However, SMNI has experienced multiple occasions where
20 service installation due dates have been missed. As a result, SMNI has no
21 confidence that the standard intervals quoted by BellSouth can be met by
22 BellSouth on a regular basis. SMNI sales representatives are told to quote 30-45
23 days as the expected installation interval when dealing with prospective
24 customers. This sets an expectation with the customer that we believe we can
25 meet consistently, and in some cases beat. This clearly builds additional days into

1 the service provisioning interval to account for problems that may arise.

2

3 Given these factors, the standard intervals provided by BellSouth have limited
4 meaning for SMNI. SMNI service representatives, as an internal standard, use a
5 10 day installation interval on service migrations for even small unbundled loop
6 orders placed with BellSouth. This is solely because SMNI lacks confidence in
7 BellSouth's ability to consistently meet installation dates that are any shorter.

8

9 **Q: DESPITE THE EXTENDED TIME FRAMES USED BY SMNI FOR SERVICE**
10 **INSTALLATION INTERVALS, DOES BELLSOUTH CONSISTENTLY MEET**
11 **SERVICE DUE DATES?**

12

13 **A: No. BellSouth does not consistently meet service due dates. As an example, in**
14 **the fourth quarter of 1997, service installation dates were missed due to**
15 **BellSouth-controlled reasons 23.3% of the time. Specifically, of 28 service**
16 **installations in October, 5 due dates were missed for BellSouth-controlled reasons**
17 **equaling 17.8% due dates missed. In November, 5 of 21 service installations**
18 **missed the due date due to BellSouth-controlled reasons, or 23.8%. In December,**
19 **4 of 11 service installation due dates were missed due to BellSouth-controlled**
20 **reasons, or 36.3%.**

21

22 **Q: WHAT IMPACT DO THESE EXTENDED INSTALLATION INTERVALS HAVE**
23 **ON SMNI AND ITS RELATIONSHIP WITH ITS CUSTOMERS?**

24

25 **A: Extended service installation intervals create the impression with customers that**

1 SMNI service is inferior to BellSouth. Since SMNI takes ownership of the quality
2 of service delivered to the end user, BellSouth is not mentioned as the cause of
3 extended intervals or delays. As a result, SMNI's reputation is impacted because
4 it can not rely upon the performance of its key unbundled loop supplier,
5 BellSouth.

6
7 Q: CAN YOU SUMMARIZE THE IMPACT THAT INSTALLATION AND SERVICE
8 PROBLEMS HAVE HAD ON SMNI AND ITS ABILITY TO COMPETE IN THE
9 MARKETPLACE?

10
11 A: The FOC, facility, disconnecting and service interruption problems that Sprint
12 has experienced are unbearable for ALECs and their customers.

13
14 Business customers rely on their telephone systems. If they decide to switch
15 providers for competitive reasons, they must be able to migrate in quick fashion
16 and without risk. Their service has to be dependable.

17
18 Quite frankly, if customers continue to face the business-affecting problems that
19 have occurred in the past, it is uncertain how many if any new customers Sprint
20 will be able to acquire in the future. Even if Sprint is able to document that their
21 specific problems were caused by BellSouth, customers may perpetuate the belief
22 that while Sprint is not at fault, the company is powerless to prevent such
23 problems. In addition, more existing customers may return to BellSouth, even if it
24 is at greater cost.

25

1 Until BellSouth corrects these recurring problems, SMNI and its customers will
2 be unfairly victimized.

3

4 **Q: PLEASE SUMMARIZE YOUR TESTIMONY.**

5

6 **A: BellSouth's failure to comply with the terms of its agreements with SMNI is**
7 **affecting SMNI's ability to compete in the marketplace in Florida. BellSouth has**
8 **not provided Firm Order Confirmation in a timely manner. BellSouth has not**
9 **identified provisioning problems in a timely manner. BellSouth has disconnected**
10 **customers seeking to migrate to Sprint service prior to the cutover date.**
11 **BellSouth has caused service interruptions to SMNI customers due to call routing**
12 **errors, translations problems or failure to properly implement interim number**
13 **portability.**

14

15 **My testimony has highlighted specific service and installation problems SMNI has**
16 **experienced in interactions with BellSouth.**

17

18 **BellSouth has not provided FOCs within the agreed 48-hour period, causing**
19 **Sprint to delay customer cutovers, inconvenience customers and their vendors,**
20 **and increase business costs.**

21

22 **BellSouth's failure to notify Sprint of facility problems in a timely manner has**
23 **resulted in SMNI being forced to delay customer cutover dates. In addition to**
24 **BellSouth providing late notice of facility problems, BellSouth also has been**
25 **reluctant to provision orders where certain network configurations exist.**

1 BellSouth's refusal to process this customers' order led to this customer's
2 conversion being delayed more than a month.

3

4 BellSouth has prematurely disconnected SMNI customers when customer cutovers
5 have been rescheduled. Customers repeatedly have been taken out of service
6 because BellSouth was not able to stop its disconnect process when due dates
7 were changed.

8

9 BellSouth has caused service outages that have prevented SMNI customers from
10 making and receiving calls. Customers' service has been interrupted for hours at a
11 time while BellSouth worked to identify then correct translations, call routing and
12 number portability issues.

13

14 Customer-prepared affidavits, Exhibits MAG-6 and MAG-7 attached hereto, offer
15 details of the impact of customer experiences.

16

17 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

18

19 A: Yes.

20

21

22

23

24

25

EXHIBIT

MAG-1

BellSouth FOC Problems April 1997

APRIL 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted 19
Total FOCs Received Within 48 Hours 1
Percent of FOCs Received Within 48 Hours: 5%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer A	N001895	04/04/97	04/10/97	5	05/12/97
Customer B	N001800	04/16/97	04/21/97	4	05/28/97
Customer C	N002008	04/24/97	04/28/97	3	04/29/97
Customer D	N001100A	04/02/97	04/10/97	6	04/26/97
Customer E	N001100	04/02/97	04/10/97	7	04/21/97
Customer F	N001574	04/07/97	04/11/97	5	04/23/97
Customer G	N004310	04/14/97	04/18/97	5	06/25/97
Customer H	N006062B	04/10/97	04/16/97	5	04/28/97
Customer I	N000155	03/31/97	04/08/97	7	04/18/97
Customer J	N010883	04/07/97	04/14/97	6	05/05/97
Customer K	N005280	04/10/97	04/15/97	4	04/17/97
Customer L	N006462	04/16/97	04/21/97	4	05/01/97
Customer M	N007200A,B	03/17/97	04/09/97	18	04/18/97
Customer N	N007491	04/04/97	04/09/97	4	04/15/97
Customer O	N004576	04/04/97	04/09/97	4	04/17/97
Customer P	N00744A	04/01/97	04/09/97	7	04/14/97
Customer Q	C000555	04/14/97	04/22/97	7	04/23/97
Customer R	N005200	04/08/97	04/16/97	7	04/24/97

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BellSouth FOC Problems May 1997

May 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted: 16
Total FOCs Received Within 48 Hours: 8
Percent of FOCs Received Within 48 Hours: 50%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer A	N004337	05/20/97	05/23/97	4	06/24/97
Customer B	N001764	05/09/97	05/16/97	6	07/02/97
Customer C	N005858	04/21/97	05/06/97	12	05/07/97
Customer D	N002002, A	05/19/97	05/23/97	5	06/05/97
Customer E	N003220	05/02/97	05/08/97	5	05/22/97
Customer F	N001033	04/18/97	05/06/97	13	06/19/97
Customer G	C001043	05/20/97	05/28/97	7	06/03/97
Customer H	N000374A	05/09/97	05/20/97	8	06/11/97

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Revised 12/16/97

BellSouth FOC Problems June 1997

June 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted: 15
Total FOCs Received Within 48 Hours: 4
Percent of FOCs Received Within 48 Hours: 27%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer A	barr.ds1	06/24/97	06/26/97	3	08/01/97
Customer B	N002661	05/23/97	06/02/97	6	06/20/97
Customer C	centralst.ds0	06/17/97	06/27/97	9	07/03/97
Customer D	N005750	05/30/97	06/04/97	4	06/12/97
Customer F	N007900A	06/05/97	06/11/97	5	07/18/97
Customer G	lakehi.ds0	06/17/97	06/23/97	4	07/12/97
Customer H	N007900B	06/05/97	06/11/97	5	07/18/97
Customer I	story.dso	06/05/97	06/11/97	5	07/15/97
Customer J	N009146	06/11/97	06/25/97	11	06/19/97
Customer K	C009145/46	06/11/97	06/20/97	11	06/27/97

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BellSouth FOC Problems July 1997

July 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
 (ASR = Access Service Request)
 (PON = Purchase Order Number)

Total ASRs Submitted: 10
 Total FOCs Received Within 48 Hours:
 Percent of FOCs Received Within 48 Hours: 60%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer A	invest.bn	06/30/97	07/02/97	3	07/09/97
Customer B	invest.did & dso	06/30/97	07/02/97	3	07/29/97
Customer C	N004821	06/26/97	07/01/97	4	07/11/97
Customer D	N006863	06/26/97	07/01/97	4	08/04/97

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Revised 12/16/97

BellSouth FOC Problems August 1997

August 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted 13
Total FOCs Received Within 48 Hours 7
Percent of FOCs Received Within 48 Hours 54%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer A	N006420	08/19/97	08/22/97	4	09/04/97
Customer B	002279 DS1	07/24/97	08/01/97	7	07/30/97
Customer C	Davis Tie	08/26/97	08/29/97	4	09/08/97
Customer D	N001011	08/19/97	08/25/97	9	08/27/97
Customer E	N008866	08/01/97	08/08/97	6	08/15/97
Customer F	orange.ds1	08/11/97	08/15/97	5	08/14/97

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BellSouth FOC Problems September 1997

September 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted: 12
Total FOCs Received Within 48 Hours: 7
Percent of FOCs Received Within 48 Hours: 58%

^ This was a verbal FOC, paper not received.

* BellSouth did not submit FOC due to their policy on Access orders. When BellSouth receives an order for access service instead of an unbundled loop, the order is worked through BellSouth's ICSC Department. The ICSC Department's policy is not return FOC, when the request is 0-4 days prior to the migration date. Instead, they commit to expedite processing the order the day the order is received and Sprint is to be notified 24 hours prior to the migration date of any facility problems.

If BellSouth receives an order for access service (which will be worked by their ICSC Department) 5 days or more prior to the migration date the ICSC Department will then issue an FOC. As detailed, in September's Facility Problems, BellSouth's system is flawed, as they failed in their commitment to notify Sprint 24 hours prior to migration of facility problems. Therefore, without receipt of an FOC when any ASR is submitted to BellSouth, Sprint cannot be guaranteed of facility availability prior to migration date.

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer A	Control.bri	09/15/97	09/18/97	3	09/26/97
Customer B	N001950	09/25/97	09/29/97	4	09/30/97
*Customer C	NSIGT10	09/26/97	10/01/97	5	10/01/97
*Customer D	OTC.ds1	09/23/97	NO FOC	*Did not receive FOC	10/02/97
*Customer E	Access ds1	09/12/97	No FOC	* Did not receive FOC	09/22/97

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October FOC Problems

BellSouth FOC Problems
October 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted: 21
Total FOCs Received Within 48 Hours: 19
Percent of FOCs Received Within 48 Hours: 90%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer P	N47617197/C33626197	10/6/97	10/9/97	3	10/15/97
Customer Q	Rolledsco.vw	10/27/97	10/30/97	3	10/31/97

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Revised 12/15/97

**BellSouth FOC Problems
November 1997**

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted: 22
Total FOCs Received Within 48 Hours: 18
Percent of FOCs Received Within 48 Hours: 82%

CUSTOMER	Customer PON	ASR TO BEL.	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer S	TWC.ds3	10/14/97	10/25/97	11	11/05/97
Customer M	2E018E	11/6/97	11/11/97	6	11/12/97
Customer T	N007676	10/28/97	11/13/97	14	11/21/97
Customer U	N851000	10/30/97	11/12/97	11	11/21/97

Revised 12/2/97

December FOC Problems

**BellSouth FOC Problems
December 1997**

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted: 11
Total FOCs Received Within 48 Hours: 7
Percent of FOCs Received Within 48 Hours: 63.64%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer V	LKMYHILTO	11/11/97	11/14/97	3	12/09/97
Customer W	PULAUBRI.TA	11/19/97	11/24/97	3	12/09/97
Customer X	HILTON.DS02	12/3/97	12/8/97	3	12/16/97
Customer Y	ORLUTH5DS0.CR	12/11/97	12/17/97	4	12/18/97

Revised 12/2/97

EXHIBIT

MAG-2

BellSouth FACILITIES PROBLEMS

April 1997

(FOC = Firm Order Confirmation)
 (ASR = Access Service Request)
 (PON = Purchase Order Number)

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days from ASR to FOC	Original CDD	Actual Migration Complete	Remarks
Customer A	N001895	04/04/97	04/10/97	5	04/11/97	05/12/97	o Customer A is a BellSouth customer who contracted with Sprint to provide two new ISDN-PRI circuits. The order to BellSouth for the DS1s was delayed for facilities. A repeater was also required in the field, and BellSouth did not know who to bill, for the repeater, whether they should bill the customer or Sprint. The customer's desired due date was missed by a month, causing the customer to lose business since they were not able to serve new customers.
							o 4/10/97, Linda Dunn, Sprint Business Consultant, called BellSouth to obtain the FOC. A verbal FOC was received and a copy of the FOC was faxed. During the conversation, Marie Lewis, BellSouth, advised Dunn that the order would be delayed until 4/18/97, because of facility problems.

Customer	Customer PON	ASR TO BELL	TEDC Received	Number Of Business Days from ASR to FO	Original CDD	Actual Migration Complete	Remarks
Customer A (Continued)							o 4/18 - Dunn called BellSouth's ICSC to follow-up the order and was informed by the BellSouth representative that there was still a facility delay
							o 4/21 - Dunn called BellSouth's ICSC to follow-up the order and was informed that there was no repeater in the field. Dunn was told that BellSouth did not know if the customer or Sprint would be responsible for paying for the repeater
							o 4/23 - Dunn during conversation with Rick LaGrange, BellSouth Project Manager, who confirmed that the order looked OK and advised Dunn to contact BellSouth's ICSC group to check the order again.
							o 4/25/97 - Dunn called Linda McGrue, BellSouth to find out when the circuits would be ready. Dunn called McGrue on a Friday, after 4:30 p.m., McGrue returned the call to let Dunn know that the engineers were gone for the day and she would follow up on Monday.
							o 4/28/97 - McGrue called Dunn and advised her that the repeater was in and a BellSouth technician would be dispatched on 4/29 to install it.
							o 4/29/97 - The BellSouth technician installed the repeater, however, did not complete the circuit installation. Also, a smart jack was not installed

Customer	Company	ASR Info Bell	ASR Received	Number of Business Days from ASR to Close	Original CDDP	Actual Migration Complete	Remarks
Customer A (Continued)							o Dunn called BellSouth's ICSC BellSouth's ICSC rep stated he was busy, but the repeater was installed. BellSouth's second and third level escalation process was involved at this point. Circuit installation was completed later in the day.
							o 5/9/97 - Sprint tested the circuits and they passed the test. Dunn contacted the customer to advise that the testing passed and they were ready to turn up the trunks.
							o 5/12/97 - Migration of the customer was complete
Customer B	N004310	04/14/97	04/18/97	5	04/29/97	06/25/97	o BellSouth facility problem. Facility problem was created by BellSouth's failure to increase capacity at the BellSouth Subscriber Line Unit (SLC) located in Sprint's central office. BellSouth was notified of this problem January 1997 but did not react until facilities depleted in April.

BellSouth FACILITIES PROBLEMS May 1997

(FOC = Firm Order Confirmation)
 (ASR = Access Service Request)
 (PON = Purchase Order Number)

Customer	Customer PON	ASR FIC TO BELL	FOC Received	Number of Business Days From ASR to FOC	Original CODD	Actual Migration Complete	Remarks	
Customer A	N005750	*4/18/97	06/02/97	4	05/06/97	06/12/97	o BellSouth notified Sprint facilities were not available.	
		*Supplemental ASR submitted on 4/29/97 changing due date to 6/12/97.						
							o Because of the facility problem the due date was changed to 6/16/97.	
							o The customer did not accept the due date change and the due date was changed to 6/12/97	
							o Migration of the customer was completed on 6/12/97.	
Customer B	N000255	*4/18/97			04/28/97	05/06/97	o The BellSouth technician either did not terminate circuit at the demarcation or did not tag the circuit	
		*Supplemental ASR submitted on 4/18/97 changing due date to 5/2/						Neither Sprint nor the customer could locate the circuit.

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDD	Actual Migration Complete	Remarks
Customer B (Continued)							o On 5/4/97, BellSouth disconnected customer's Service. The disconnect should not have been worked until the scheduled migration date of 5/6. BellSouth restored customer's service.
							o On 5/5/97, Sprint discovered all of the customer's lines were not completely restored and the hunt group was not functioning. Sprint notified BellSouth of the problems. BellSouth corrected the problems which were caused by the early disconnect of the customer's service by BellSouth prior to the 5/6/97 migration date.
							o Customer migration was completed on 5/6/97.

BellSouth FACILITIES PROBLEMS

June 1997

(FOC = Firm Order Confirmation)
 (ASR = Access Service Request)
 (PON = Purchase Order Number)

Customer	Order #	ASR To BELL	FOC Received	Number Of Business Days From ASR to FOC	Original DOB	Actual Migration Complete	Network
Customer A	Part.D001	6/22/97	6/22/97	0	6/22/97	6/22/97	6/22/97 - The original due date
	Part.D002	6/22/97	6/22/97	0	6/22/97	6/22/97	was changed to 7/7/97. The
							change in due date was caused
							when Sprint had to send
							BellSouth a Supplemental
							Center Facility Assignment (CFA)
							because Sprint's assignment on
							the original CFA was incorrect.
							Also, the due date was changed
							because BellSouth could not
							complete the engineering in
							time for the original due date.
							Sprint contacted customer
							- customer agreed to change.

Customer	Customer ID#	ASR TO NELLE	FOC Received	Number Of Business Days From ASR to FOC	Original FODD	ASR Complete	Remarks
Customer A (Continued)							o 7/3/97 - Because of BellSouth's facility problem, the due date was changed again to 7/10/97.
							o 7/8/97 - 8:00 a.m. - customer called Sprint to report their number was out-of-service, calls were receiving a "disconnected" recording. Sprint reported the problem to BellSouth's Unbundled Network Element (UNE) Center.
							o 7/8/97 - BellSouth disconnected customer prior to the scheduled migration date of 7/10/97. BellSouth restored the customer's service.
Customer B	Park DS02	6/20/97	6/27/97	8	6/20/97	07/10/97	o 7/1/97 - Due to a BellSouth facility problem, due date was changed from 6/30/97 to 7/8/97.
							*ASR was supplemented on 7/3/97 to change the due date to 7/10/97.
							o 7/3/97 - Because of BellSouth's facility problem, the due date was changed again, to 7/10/97.
							o 7/8/97 - BellSouth disconnected the Customer. In error, this was done prior to the scheduled migration of 7/10. BellSouth reconnected the customer.

Customer	Product	ASR Date	POC Date	Number of Business Days	Original	ASR	Remarks
Customer C	Prod. D884	02/09/97	04/27/97	01/08/2000	08/30/97	07/10/97	7/3/97 - Because of a BellSouth facility problem the due date was changed to 7/10/97
							*ASR was supplemented on supplemented on 7/30/97 to change the due date to 7/10/97
							7/6/97 - Customer disconnected early Reported problem to BellSouth for reworking

BellSouth FACILITIES PROBLEMS
 July 1997

(FOC = Firm Order Confirmation)
 (ASR = Access Service Request)
 (PON = Purchase Order Number)

Customer	Customer PON	ASR Date	FOC Received	Number Of Business Days From ASR to FOC	Original FOC	Actual Migration Complete	Remarks
Customer A	002278.DS	07/24/97	08/01/97	7	07/30/97	07/31/97	o 7/28/97 - BellSouth engineering was not complete and facilities were not ready.
							o 7/31/97 - FOC never received Migration completed.
							o 8/1/97 - Received FOC.

BellSouth FACILITIES PROBLEMS August 1997

(FOC = Firm Order Confirmation)
 (ASR = Access Service Request)
 (PON = Purchase Order Number)

Customer	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR to FOC	Original Date	Actual Migration Complete	Remarks
Customer A	N008867	08/06/97	08/07/97		08/11/97	08/12/97	o 8/6/97 - ASR to BellSouth.
							o 8/7/97 - FOC received from BellSouth
							o 8/11/97 - BellSouth ready to test five lines, but not on two. BellSouth will continue to work on the lines.
							o BellSouth requested the due date changed in order to avoid jeopardy.
							o Customer migrated on 8/12/97
Customer B	N008866	08/01/97	08/18/97	01/17/00	08/12/97	08/15/97	o 8/1/97 - ASR to BellSouth
							o 8/4/97 - Sprint supplemented the ASR in order to add signaling.
							o 8/7/97 - No FOC

Customer	Customer PDR	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original QDDO	Actual Migration Complete	Remarks
							o 8/8/97 - Sprint's Business Consultant called Diane Saiters, BellSouth. Saiters stated that the facilities were not available and new facilities would not be available until 8/4/97.
							o Midred Graham, Sprint Manager, spoke with BellSouth about the facility problem. A decision was made to change the due date to 8/13/97 because of the facility problem.
							o 8/12/97 - BellSouth contacted Sprint stating that they (BellSouth) were trying to meet the 8/13/97 due date, but most likely the migration would be completed by noon on 8/14/97.
							o 8/12/97 - BellSouth discovered a cable problem and notified Sprint, also a utility permit was required. Facility permits require a 48 hour notice, but an expedite would be requested. The due date was changed to 8/18/97 due to BellSouth's facility delay.
							o 8/13/97 - Received an FOC changing the due date to 8/18/97.
							o 8/15/97 - Customer migration completed

BellSouth FACILITIES PROBLEMS September 1997

(FOC = Firm Order Confirmation)
 (ASR = Access Service Request)
 (PON = Purchase Order Number)

Customer	Customer PON	ASR to BELL	FOC Received	Number Of Business Days from ASR to FOC	Original CDD	Actual Migration Complete	Remarks
Customer A	OTC.da1	09/28/97			09/29/97	10/01/97	o An ASR was submitted to BellSouth on 9/26/97. This request was for a T1/access service.
							o BellSouth and Sprint participated in a conference call. BellSouth stated their policy regarding any access request which was sent through their ICSC Department, received 0-4 days prior to the migration date would not have an FOC issued, but BellSouth would commit to expediting and processing the order the day the order was received. Also, BellSouth committed to notification of Sprint 24 hours prior to the migration date of any facility problems or unavailability.

Customer	Customer PON	ASR TO BELL	FOC Receipt	Number Of Business Days from ASR to FOC	Original COOP	Actual Migration Compl.	Remarks
Customer A (Cont.)							o FOC was not received, because of BellSouth's policy on access orders.
							o 9/29/97 - BellSouth failed to notify Sprint of facility problems until the date of migration (9/29/97). BellSouth did not give an estimated date the facilities would be available.
							Sprint notified BellSouth several times prior to 9/29/97 to verify if facilities were available. Sprint was not notified of the facility problem until the day of migration.
							o BellSouth failed in their commitment to notify Sprint 24 hours prior to customer migration of facility problems.
							o The customer migrated on 10/1/97. This was two days after the original customer desired due date.

EXHIBIT

MAG-3

State _____
 File No. _____
 Orders
 Sprin' O P
 Corr
 Plead
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 Test
 J-Inf
 Other
 DATE RECEIVED

AFFIDAVIT

STATE OF FLORIDA)
)
 COUNTY OF ORANGE)

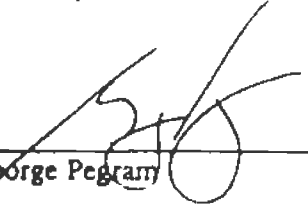
I, George Pegrum, based on information and belief, state and allege ^{OCT} ~~the~~ 7 '97 following:

I am the general manager for the Collegiate Village Inn, located at 11850 University Boulevard, Orlando, Florida. The Collegiate Village Inn is a private dormitory facility located west of the University of Central Florida campus. We have 307 rooms with two students in each room.

I was first approached by Danny Adams of SMNI in February about switching my local telephone service from BellSouth to SMNI. I was eager to do so. We are the only dormitory in the state that is paying the hotel rate of 0.12 - 0.15 cents per call for calls above the monthly maximum, which we routinely exceed. SMNI offered us a flat rate, which is what we've wanted for years.

The switch to SMNI was originally scheduled during spring break in March of this year. The switch was delayed several times due to problems with the engineering. SMNI stated their engineering was complete, however, BellSouth couldn't get their act together. I even got so fed up I called the Florida Public Service Commission to complain. The switch finally happened in mid-May.

Further affiant sayeth naught.

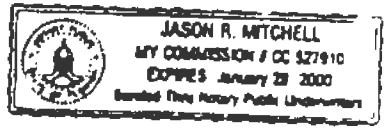


 George Pegrum

Subscribed and sworn before me this 6th day of October, 1997



 Notary Public



My appointment expires on 1/28/2000

EXHIBIT

MAG-4

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ORANGE)

I, Bill Pickering based on information and belief, state and allege the following:

I am the President of First Summit Financial Group and National Sales Director for Jefferson-Pilot Life Insurance Company. Our offices are located at 800 North Magnolia Avenue, Suite 1310, Orlando, Florida. My company has 10 rotary lines, one fax line and one modem line. Telephone service is absolutely critical to my business. Every day we receive approximately 125 incoming calls and make about 80 outgoing calls.

In July 1996, my company was approached about switching its local telephone service from Southern Bell to Sprint. For a number of years our office was located in Maitland, Florida and we had been customers of United Telephone and had received good service from United. When they approached us about providing service in our current offices in downtown Orlando, I decided to try the Sprint service, although it was with some reluctance. Usually, if I am receiving good service, I am not inclined to change. The incentive here was if we changed, we could save \$150 per month. That's \$1800 per year. That's a significant reduction in overhead.

There were many delays in getting the service hooked up. I kept asking, "When is this change to Sprint going to happen?" It finally occurred in December 1996. Not too long after we made the switch we had a half day with no phone service. Of course, it was Murphy's Law. It was a very busy day and we got lots of complaints from agents and policy holders. We could call out, but no one could call in. You don't want your customers to think you're out playing golf. I told Marty Varsubsky, my associate, that we should go back to Southern Bell because when we were with Southern Bell we never had these problems. We just cannot afford to be out of service. Our Sprint sales rep, Danny Adams faxed over something from Southern Bell saying it was their fault, but I didn't really care whose fault it was, I just can't afford to be without phone service.

Danny Adams talked Marty into giving Sprint one more chance and we decided to hang in there, but after another outage I decided enough was enough. This one lasted two to three hours. I made the decision that we were going back to Southern Bell. We made the decision on Thursday and the changeover was to take place the following Monday.

That Monday, I left to go to the bank about 11:30 a.m. I called in to the office on my mobile phone and it rang 20-30 times. I finally called Turner Construction next door to have them go to our office to tell them our telephones were out. When I got back to the office, I could call out, but no one could call in. I called Southern Bell, and they said they would try to locate the technician who had done the work, because he was close by and could come back

to fix our problem. The technician never showed, so I called again and they said they would try to page him. When I called the next time, they said they didn't know why the technician was unreachable. So I said, "I want to talk with his supervisor"

In the meantime, I also talked to Danny Adams at Sprint. He said all the Southern Bell technician had to do was to flip a switch so we could get incoming calls. Danny kept saying that we could figure out who to blame later, but in the meantime, the important thing was to enable us to receive incoming calls. I called every Southern Bell service number I could get a hold of. I talked to people in Jacksonville, Miami and Atlanta. I told them to do what Danny Adams suggested, but they would not do it. They were too busy blaming Sprint. Southern Bell had admitted that they had written the service order incorrectly, however, they still insisted the entire problem was Sprint's fault and they (Southern Bell) had done nothing incorrectly. Since Southern Bell would not flip the switch, I asked them if they could put a recording on the line that indicated there was "trouble on the line." Southern Bell said no, they would not put a recording on the line because again, it was all Sprint's fault. When I finally spoke with the supervisor at 5:30 p.m., he said we had caused the problem because the number we wanted was not our number and it had not been "aged long enough." I asked how this could be...our telephone number has been the same ever since we moved downtown more than two years ago. The supervisor also said they were new at the business of "reselling."

This was still going on at 5:30 p.m. By that time I was very angry and was actually somewhat rude and profane. But I was fed up with everyone lying and blaming someone else. I threatened to call one of the local TV stations and report this to their consumer action line.

A few days later I received a visit from a guy from Southern Bell who flew down from Atlanta. He'd been with the company 35 years. He said Southern Bell had made mistakes and apologized, because this had been handled improperly at every step of the way. He told me this would be a case study for Southern Bell and told me he was prepared to offer me six months of free service...that's about worth about \$4,000 to me.


I'm not happy with Southern Bell, but as far as I am concerned they're the only game in town. I had no problems with Sprint except for the power outages, but I never had blackouts with Southern Bell, so that is why I went back. I just can't afford to be out of service.

Further affiant sayeth naught.



Bill Pickering

Subscribed and sworn before me this 8th day of October, 1997



Louise C. Blair

Notary Public

My Commission Expires on 6/16/2001



LOUISE C. BLAIR
My Comm Exp 6/16/2001
Bonded By Service Ins
No CC656020
 Permanently sworn 11/20/90

EXHIBIT

MAG-5

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ORANGE)

I, Sean Lancy, based on information and belief, state and allege the following.

I am the club manager of the Citrus Club, which is a dining establishment located on the 18th floor of the Republic building in downtown Orlando. It is a membership dining facility patronized by the Orlando business community. We have very little "walk in traffic." Most of our business is by reservation. In addition we have a significant catering and private party business. We have 16 voice and two data lines. Our decision to switch from Southern Bell to SMNI was based on economics. The SMNI proposal was going to save us \$1,000 per year.

We switched to SMNI service in December 1996. The installation was very hairy. The Sprint crew was scheduled to come in on Saturday. That Friday at 4:00 p.m. the entire phone system went away. It completely disappeared. It finally came back at 8:00 p.m. Southern Bell had turned off everything a day early. We could not call out and customers who tried to call in got a recording that said, "This number has been disconnected." This was devastating to our business because Friday nights are a busy time for us and our customers could not call in for dinner reservations. It took until mid week to completely restore service.

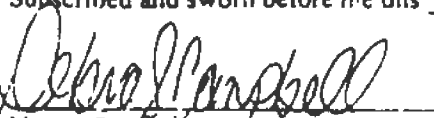
Since then the exact same scenario has happened twice. With these two occurrences incoming callers would get an unending ring...as if you weren't answering your telephone. I know that both of these incidents were caused by problems at the Southern Bell location. The most recent incident was in July and the previous incident occurred in June. The July incident began the night before. I tried to dial out on the main line. I would attempt to dial out and then would put the line on hold to access the next line. We were down until lunchtime with both of these incidents. That is devastating to our business because our members cannot get through to call for reservations.

I've thought it might be easier to switch back. I'm frustrated. It seems that the people you pay your bill to should be accountable for the service you receive. It's frustrating because we are not paying our bill to Southern Bell and yet when they are the root cause of the problems, there is no sense of urgency with them to get it corrected because we don't pay them.

Further affiant sayeth naught.


Sean Lancy

Subscribed and sworn before me this 1st day of October, 1997


Notary Public

EXHIBIT

MAG-6

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ORANGE)

I, Julia Downs, based on information and belief, state and allege the following:

I am the Director of Human Resources and Administration for WMFE, Channel 24, the public television station for Orlando, and 90.7 on the FM dial, the public radio station. WMFE has 12 PBX trunk lines and 32 "BI" business lines, including one fifteen line rotary group, one three line rotary group and 14 private lines. During the summer of 1996 we were approached by Sprint Metropolitan about the possibility of switching our local telephone service from Southern Bell. We made the decision to switch because of the substantial savings we could receive by switching to SMNI. We also believed that switching from Southern Bell to SMNI would be transparent to us at WMFE and to those calling WMFE.

Our original cutover date from Southern Bell was scheduled for October 17, 1996. I was scheduled to be out of town October 18, so I requested that we postpone the cutover in case there were any problems. The rescheduled cutover date was November 7, 1996, however, for some unknown reason BellSouth disconnected all service to WMFE during the early morning hours on October 22, 1997. It took three days to get service totally restored to WMFE with the work being completed one day before the commencement of our radio membership drive, which is totally dependent on telephone calls to generate revenue.


During the rescheduled cutover only 13 of the lines could be cutover because of technical problems on BellSouth's end. This resulted in a second cutover date of November 13, 1996. On that date BellSouth had a service technician and a supervisor on site to assist with the cutover. Both were professional and efficient in working with me and with SMNI, and we were able to cutover the remaining 30 lines.

In addition our telephone number was temporarily eliminated from BellSouth's directory assistance. I discovered this quite accidentally, when a caller pointed this out to us.

There were times when I thought maybe we should go back to BellSouth, but I just don't want to reward them for what I believe to be unexplained and inexcusable behavior. It's a matter of principle.

Attached to my affidavit is a memo I wrote to our President, Steve Steck, when I was asked to explain the problems we had been having with our telephone system. I also have attached a letter he wrote to Thomas Hunt, of BellSouth concerning the problems we experienced.

Further affiant sayeth naught.


Julia Downs

Subscribed and sworn before me this 1 day of October, 1997.


Notary Public

My Commission Expires on 7/13/2001



Susan J. Akomas
MY COMMISSION # CCL34420 EXPIRES
July 13, 2001
NOTARY PUBLIC STATE OF FLORIDA



WMFE-TV/FM
11510 E Colonial Dr
Orlando, Florida 32817-4699
(407) 273-2300

Mr. Thomas E. Hunt
Regional Director
BellSouth
500 North Orange Avenue, Ste 568
Orlando, Florida 32801

Dear Tom:

December 3, 1996

Recently we experienced some exasperating moments with BellSouth. I thought you ought to know about it.

I have enclosed a copy of a memorandum from WMFE's Director of Administration, Julia Downs. She itemizes the difficulties she and WMFE experienced with BellSouth.

Surely, the instances she describes are not behaviors or procedures you condone. After your reflection on her comments, I would appreciate your thoughtful response.

By the way, before we switched from BellSouth to Sprint, we asked if BellSouth would care to negotiate in some manner to keep our business. BellSouth declined.

Best Holiday Wishes,

A handwritten signature in cursive script that reads 'Steve'.

Stephen McKenney Steck
President and Chief Executive Officer

00000000
(000000)120000 doc
Enclosure

c: Julia Downs



MEMORANDUM

TO: Steve Steck
FROM: Julia Downs *JD*
SUBJECT: Telephone Service
DATE: November 22, 1996

This memo is in response to your questions and concerns about our telephone service.

As you know, we recently elected to change from Bell South to Sprint Metropolitan as the provider of our local network service. We made this decision based on the substantial savings to WMFE (approximately \$8,000 annually), and because the change would be transparent to us here at WMFE and to those calling WMFE. However, several things have happened that made that change *painfully* obvious.

First, the cutover was tentatively scheduled for October 17. Because I was going to be out of town beginning October 18, we decided to postpone the cutover, just in case there were any problems. Bell South was notified of this postponement. However, for some reason unknown to anyone, Bell South disconnected all service to WMFE during the early morning hours of October 22. It took three days to get service totally restored to WMFE, the work being completed just one day before the start of our Radio Membership Drive, which is totally dependent on telephone calls to generate revenue.

Second, our cutover was scheduled for November 7. Of the 43 lines that needed to be cutover, they could only complete 13 of them because of technical problems on Bell South's end. This caused us to have to schedule another cutover date on November 13. On that date, Bell South had a service technician and supervisor on site to assist with the cutover. They were both professional and efficient in working with me and Sprint United, and the remaining 30 lines were cutover at that time.

Third, Bell South terminated all of WMFE's long distance calling cards. We did not request that and it should not have been a part of the service disconnection. You, of course, were stranded out of town without a long distance calling card.

Memorandum to Stephen McKenney Steck
November 21, 1996
Page 2

And fourth, our telephone number was temporarily eliminated from Bell South's directory assistance, which was an error on their part. We discovered this when a caller pointed it out to us.

I would like to point out that while this is a new process for the telephone companies; in my opinion there were too many unexplainable accidents on Bell South's part.

I hope this gives you a good synopsis of the problems we encountered during this process. Please let me know if you have any additional questions.

jd

EXHIBIT

MAG-7

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ORANGE)

State	_____
File No.	_____
Orders	<input type="checkbox"/>
Sprint	<input type="checkbox"/>
O P	<input type="checkbox"/>
Plead	<input type="checkbox"/>
Disc.	<input type="checkbox"/>
Test.	<input type="checkbox"/>
Brief	<input type="checkbox"/>
Other	<input type="checkbox"/>

DATE REFILED: _____

OCT 7 '97

I, Rocky Santomissino, based on information and belief, state and allege the following:

I am the vice president and secretary-treasurer of J. Rolfe Davis Insurance, with principal offices located at 11 South Bumby Avenue, Orlando, Florida. We are a large independent insurance agency located in downtown Orlando. We had been using Vista-United (Disney) for our telephone equipment maintenance and had been happy with the service they provided. In addition, United had been our local telephone service provider in our Longwood office and we'd always been happy with them, so it seemed natural to switch to someone we knew, with whom we'd had a previous good business relationship. Our telephone service consists of a total of 43 lines; 18 business (B1) lines, 20 flat-rate combination PBX trunks in three rotary groups, five Direct Inward Dial ("DID") PBX trunks and 20 DID numbers. Our decision to switch to SMNI was purely economic. We are bottom line oriented, and with SMNI's proposal we were going to save \$1,000 per month or \$12,000 per year.

We began talking to SMNI in February of this year. The actual switch to SMNI took about 90 days to occur. As I look back in my planner, I note an entry on March 12 and see an entry "Sprint switchover?" The switchover began on Saturday, March 15 and was completed on Saturday, March 29, 1997. However, on Monday, April 1, when our main number, 896-0550 was dialed, our customers heard a BellSouth recording stating, "This number has been disconnected." We have 7,000 clients and receive 700-800 calls a day. Clearly this type of recording is totally unacceptable. In addition, some of the lines were completely dead or had a constant busy signal. We continued to experience a lot of problems throughout the month of April.

In August we had another bad experience when we tried to set up a satellite office. We had acquired another agency of 11 people and needed to move staff out of their existing offices to a new location several blocks south of our main office, before we could bring the acquired employees into the main office. We signed the contract for telephone services in late July, and we wanted the new facility up and running by September 1. I didn't want the employees associated with the move to relocate until the telephone service was up and working. The phone service was scheduled to go in on August 22. On August 21, the day before the cutover was to occur, a BellSouth employee either mailed or delivered schematic drawings to the office manager at the satellite office indicating BellSouth's cable facilities at the new location would not support the services requested. I was very displeased. The office manager had nothing to do with the telephone decisions. And it's my understanding that BellSouth should have been dealing

directly with SMNI, not us and certainly not with an office manager who had nothing to do with the telephone service. The installation of telephone services at the new location was completed the week of September 1, 1997. We continued to have numerous problems with the DID lines, tie lines, etc. for almost two weeks after the installation date.

Finally on September 5, SMNI was supposed to contact BellSouth to have them forward calls on both the main line, 894-7024, and the fax line, 894-7027, from the acquired agency to J. Rolfe Davis' offices effective at 5:00 p.m. on Friday, September 12. BellSouth disconnected the lines at 5:00 a.m., not 5:00 p.m., as we had requested. The calls to the fax line were not forwarded all weekend, because I kept checking and I would get a recording, "The number you are calling may not be connected."

I'm not mad at Sprint. I think we are the victims of circumstance. I personally am a fanatic for organization and detail. I pride myself on doing things flawlessly. The decision to switch local telephone companies has cost me credibility within my company because of all of the problems we have experienced. I've had to deal with numerous client complaints, employee concerns and complaints, and the unhappiness and frustrations of our board of directors, including our president. Due to these numerous problems, my position these last seven months has been pure hell. Based on my experience, the only way I would switch again is if it could happen quickly and painlessly. I am convinced that BellSouth is trying to sabotage SMNI's efforts to enter its markets. However, as a customer I am caught in the crossfire.

Further affiant sayeth naught.


Rocky Santomasino

Subscribed and sworn before me this 2nd day of October, 1997.


Notary Public



CYNTHIA L. HOLT
My Commission CC480868
Expires Sep 08 1999

My appointment expires on 9-6-99