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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of : **UNDOCKETED**
:
Status of operational :
support systems. :

VOLUME 2
Pages 212 through 366



PROCEEDINGS: WORKSHOP

BEFORE: CHAIRMAN JOE GARCIA
COMMISSIONER J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER JULIA L. JOHNSON
COMMISSIONER E. LEON JACOBS, JR.

DATE: **Wednesday, May 6, 1999**

TIME: Commenced at 9:30 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: H. RUTHE POTAMI, CSR, RPR
KIMBERLY K. BERENS, CSR, RPR
FPSC Commission Reporters

IN ATTENDANCE:

(As heretofore noted.)

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P R O C E E D I N G S

(Workshop reconvened at 9:30 a.m.)

COMMISSIONER DEASON: The Chairman has asked that we go ahead and get started this morning.

Ms. Keating?

MS. KEATING: Our first presenter this morning is Jay Bradbury on behalf of AT&T.

MR. BRADBURY: Good morning, Commissioners. Thank you for this opportunity to talk to you this morning about the status of OSS implementation.

My presentation this morning will be broken into about eight parts. We'll spend some time initially talking about OSSs in general, their definition, and their role. We'll talk about AT&T's interface use over the years and our internal developments, and then we'll talk about the five business functions that OSS supports; preordering, ordering, flow-through provisioning, maintenance and repair. Obviously flow-through is not a business function, but it describes what happens in ordering.

One of the things we need to be very careful about is to understand the full scope of OSS. The name and the abbreviation make it very easy to assume that OSS is only concerned with technology. And OSS is actually concerned with process.

1 In fact, the U.S. Department of Justice
2 originally described what they call wholesale support
3 processes. There's really a much better name for
4 what's going on here, but OSS is the terminology that
5 has stuck in the industry and in the process that
6 we're in today.

7 Operations Support Systems include three
8 things: Systems, information, and personnel that
9 support the use of network elements or services.

10 There are two types of processes that are
11 included within operation support systems; automated
12 processes and manual processes. Both are important,
13 and both must be considered when you evaluate the
14 status of OSS. And these processes are required to
15 make resale services and unbundled elements
16 meaningfully available to competitors. They support
17 the five business functions that are often called the
18 five OSS functions, but these are really business
19 functions.

20 In implementing OSS functions, again, to be
21 very careful, we must not focus only on the
22 technology. We are in turn working with processes,
23 the top tier that you see here. These are the tasks
24 that need to get done. People and technology are what
25 we use to get those tasks done with. Terrible

1 sentence. But you have to have both people and
2 technology and processes that describe how they're
3 used to manage the network elements or the portions of
4 the data that you're trying to get.

5 So you see network elements, NEs. You see
6 databases, DBs. You see people that you recognize on
7 the third tier, and what we're trying to accomplish on
8 the business process is represented on the upper tier.
9 And so you've got to plan your OSS technology, your
10 business processes that support that technology, your
11 personnel training, your data architecture, and your
12 data communications together to support all of the
13 forms of market entry; resale, the use of unbundled
14 elements or facilities-based interconnection.

15 There's been a general consensus in the
16 industry, over the last four years that I've been
17 involved in working on OSSs, that gateways are the
18 potential solution to this problem. You saw yesterday
19 with Telcordia, they're talking about the many-to-one
20 problem.

21 They have a solution that's designed that
22 the industry, you know, longer term, people like AT&T
23 and MCI and some other players, we each are building
24 our own gateways to deal with folks today.

25 But what a gateway does, it allows new

1 entrants and BellSouth's operations support systems,
2 both the people and the computers, in this case
3 largely the computers, to exchange information with
4 each other as if they were one system seamlessly, yet
5 they can still operate independently from each other
6 internally.

7 We've had both successes and failures in
8 developing these gateways, between AT&T and BellSouth
9 specifically, and AT&T and other ILECs around the
10 country. Some of the things that help are the use of
11 industry standards, but you can develop gateways
12 without industry standards. Doing that helps promote
13 the development of industry standards.

14 One of the ways industry standards come
15 about is two trading partners somewhere in this
16 country figure out how to do something, and then they
17 go tell the rest of the industry about it. They build
18 a consensus around that solution and the industry
19 adopts it. That's happened several times over the
20 last four years.

21 But, ultimately, the two trading partners
22 involved in any transaction have got to agree upon the
23 data elements that they're going to transmit, how
24 they're defined, what message formats they're going to
25 use, and what communications protocols they're going

1 to use. Okay.

2 Gateways come in a pair. I've got a gateway
3 that talks to BellSouth about a lot of things. They
4 have a gateway that talks back to me. The Telcordia
5 solution today we put -- you saw yesterday actually
6 puts another gateway in the middle that talks to both
7 of them. And, again, that's a long-term, potential
8 solution to some problems that are facing the
9 industry.

10 But the important thing is that what we're
11 trying to do -- Sharon, you can go on to the next
12 one -- is accomplish processes. Again, these are the
13 business processes -- and this is an eye test for you
14 folks with the half-page charts out there. It's not
15 too much better for you Commissioners, I understand,
16 and it's -- clearly it's not good here.

17 But across the top tier are the five
18 business processes that OSSs support, and below each
19 of those I've shown some of the functionality that
20 we're talking about. You heard Mr. Stacy and the
21 folks from GTE and Sprint talk about things like
22 address validation and so forth yesterday, so you're
23 familiar with those terms.

24 The next tier down are the OSSs and the work
25 processes and the people that are necessary to

1 accomplish that. And in that tier I've tried to use
2 the BellSouth names for things in most cases, and so
3 you'll -- you see LENS and you see TAG and you see the
4 LCSC, and I've got a little plus sign there. That
5 means the LCSC and its other associated centers.
6 There's a UNE center that's part of that organization,
7 for example. There's some repair centers on the
8 wholesale side of BellSouth. So those names and
9 acronyms are all, to the best of my knowledge, you
10 know, we're doing with BellSouth.

11 So the business processes are what we're
12 trying to accomplish. The OSS and work processes are
13 the means to accomplish those business processes. And
14 then the next tier down is how are we doing; how is
15 success to be measured. And that's where you see the
16 performance measurements, and, again, these names come
17 out of the BellSouth region-wide SQM, service quality
18 management -- or measurement package. So these are
19 the measurements that are generally in place to
20 measure the success of the business processes being
21 supported by the OSSs.

22 And, finally, at the bottom is the goal.
23 What we're trying to accomplish here is competitive
24 choice for consumers. If we fail to provide to the
25 CLEC industry equivalency to what happens in

1 BellSouth, the CLECs' customers will perceive the
2 CLECs' business and service and products as being
3 inferior.

4 Sharon -- and you can go on to the next one.

5 We've used a number of interfaces to work
6 with BellSouth since our initial market entry in
7 February of 1997. Again, I began discussing
8 interfaces with BellSouth in August of 1995, and we
9 did do some trial work in late '96, but we entered the
10 resale market in the state of Georgia in February of
11 1997.

12 These are some of the interfaces that we've
13 used since then. These are the preordering
14 interfaces. Some of them were used as an interim
15 basis. We had what was called -- we had a direct
16 access to the regional street address guide, a thing
17 call IC ref, and we used that until about September of
18 1997.

19 We had, and still have a direct, download on
20 occasion from the P/SIMS and COFFI databases at
21 BellSouth. We've maintained that because throughout
22 the iterations of the preordering interfaces that have
23 been available to us, we have found that we get more
24 information from this download than we get on a
25 transaction by transaction using either LENS or ECI or

1 EC-LITE that we built or the TAG interface today.

2 **COMMISSIONER JACOBS:** That's an interesting
3 point. So in essence you get a better cat -- I should
4 say you get a better menu of features when --

5 **MR. BRADBURY:** It's what we're getting there
6 is a download of those entire databases where it will
7 take that download and put it into our computers and
8 manipulate the data as we want to manipulate it on a
9 transaction basis.

10 With the on-line interfaces, you go across
11 and you ask on a specific customer-by-customer thing
12 for that. By an address, you find out what features
13 and services are available as BellSouth is delivering
14 across those interfaces, and they're filtering some
15 information out when they do that.

16 With -- this copy of the database that they
17 were providing to us had more information.

18 **COMMISSIONER DEASON:** How do you receive
19 updates to that database?

20 **MR. BRADBURY:** It's a network data mover
21 download. I think you saw that term yesterday. It's
22 a batch download, and this is a reasonably stable
23 database. You know, we're talking about the features
24 and services that are available in BellSouth's central
25 offices. That doesn't change every day. So I think

1 typically we have been taking that download about once
2 a month.

3 Again, we also had a direct connection for a
4 while to the ATLAS, the number administration system,
5 so that we could get telephone numbers, and that was a
6 similar sort of thing, a network data mover. We sent
7 a request over for blocks of numbers, say, 100
8 numbers. We brought them. We managed those numbers
9 until we ran out of them and then we asked for another
10 block. And so that was an interim process we used
11 until we started using LENS.

12 You see right there we used ATLAS to
13 September of '97, and from September of '97 on we have
14 been making use of the BellSouth LENS ordering,
15 preordering interface.

16 We jointly built and we did use for a period
17 of time another preordering interface called EC-LITE.
18 We used it from January through July of last year. It
19 had the same functionality as LENS basically. We are
20 currently also making use of the preordering
21 capability in the TAG interface that BellSouth
22 developed and put into service last year.

23 We turned it up on January the 15th and, to
24 the best of my knowledge, we were the first CLEC that
25 actually put that into a production mode with

1 BellSouth. We're not making a great deal of use of it
2 right now. We're slowly integrating that into our
3 back-end systems, but we are using it and, as I'll
4 talk about later, we're only using it for a limited
5 set of functions.

6 Ordering and provisioning: We use
7 predominantly the EDI interface, and this is the
8 mainframe version of EDI. There's a difference
9 between that and what I'll call the PC version of EDI
10 we'll talk about later. We use it for ordering
11 provisioning.

12 We turned it up for use in early '97. We've
13 gone through each of the changes, inversions that have
14 come out, and we're looking forward to the OSS '99
15 version that will come out now in probably September
16 or October of this year; and this is the merged
17 version that's designed to save each of us some IT
18 development resources in not having to step
19 individually through 8, 9 and 10. So we're looking
20 forward to that.

21 We also make use of the exact interfaces,
22 the same interface that's used in the interconnection
23 world in the IXC world to get trunks and things of
24 that nature.

25 We did make use of LENS in testing, but

1 never used it in production for ordering.

2 EDI-PC, we also became certified in that
3 last year. One of our business units looked at it
4 briefly for an interim use. They never really got
5 that far with it, but we maintain our little secure
6 card and we use it on a dial-up basis; so we can still
7 use it if we need to.

8 And of course we do a considerable amount of
9 business in our ordering provisioning over manual
10 facilities by sending faxes. There are many things
11 that you can only do today by sending a fax.

12 **COMMISSIONER JACOBS:** Are you at liberty to
13 say why LENS never -- for this particular function
14 never moved into production?

15 **MR. BRADBURY:** We've been an EDI user all
16 along. EDI has much fuller capabilities. It's
17 machine to machine. It's integratable into our
18 back-end systems, whereas the LENS is a human to
19 machine interface; and so if you're going to use LENS
20 to maintain your own database, you have the double
21 entry.

22 **COMMISSIONER JACOBS:** And LENS, your focus
23 there would be entering stuff, but now you can do
24 direct --

25 **MR. BRADBURY:** Yeah.

1 **COMMISSIONER JACOBS:** Okay.

2 **MR. BRADBURY:** A couple other -- I lumped
3 together here maintenance and repair billing in a
4 miscellaneous interface that we've made use of over
5 the years.

6 There's been an electronic bonding interface
7 in the interexchange community for a long time called
8 EBI. It had potential use for local. You could pass
9 a ticket that way. We've never used it that way. We
10 did build to and utilized BellSouth's ECTA. This is a
11 version of electronic bonded interfaces that's
12 specific to local, and we did build and use that in
13 the March to April time frame last year.

14 We stopped because it takes a critical mass
15 of a large number of customers to make that efficient.
16 Okay. It's a machine to machine. It's designed for
17 high volume.

18 We have a new chairman of our corporation,
19 came on board about 18 months ago. He looked at our
20 market entry plans, at that point which were based on
21 resale, and he said, folks, I can't continue to lose
22 \$4 a month on every customer you sign up; so he put an
23 end to that.

24 We put then the EBI ECTA interface on the
25 shelf. We still have all the hardware and software

1 running. When we have a critical mass of customers
2 again, we would turn that back on and use that as our
3 maintenance and repair interface.

4 We did a brief evaluation of TAFI. Our
5 business units concluded when they did that in July
6 of '97 that because that of the lack of back-end
7 integration on our side -- it's a -- again human to
8 machine, so if we used that -- and I'll talk about
9 this later -- I would have to work in TAFI, then turn
10 around and update my own databases' dual entry.

11 In terms of billing interfaces, we make use
12 of all of the available usage records that are out
13 there; the ODUF, ADUF (phonetic). Extended -- ODUF
14 you saw. And I don't think we were going to talk a
15 whole lot about billing here, but I wanted to show
16 that we've been doing that.

17 We receive most of the billing that we get
18 from BellSouth where we have to pay them over the CAB
19 system, carrier access billing system. And there's
20 one other interface that we have that manages who is
21 the long distance carrier for this local customer. We
22 exchanged that over a system called CARE, and that's
23 up been up in service right along.

24 **COMMISSIONER DEASON:** Let me ask a question
25 before you leave that slide.

1 What interface are you currently using for
2 maintenance and repair?

3 **MR. BRADBURY:** Telephone. When we turned
4 down the EBI interface, we went back to telephoning
5 our orders in. And, you know, I've got a section on
6 maintenance where I'll talk about why we do that.
7 It's a consistency of process issue.

8 Okay. So those are -- so that's what we've
9 used with BellSouth.

10 I'll use the next two slides here to talk
11 about what's on the left side of the screens. I get
12 turned around here every once in a while.

13 This is our side of the gateways, and the
14 right side is what's on BellSouth's side of the
15 gateways. Again, starting from the top, we do still
16 have a capability to use web LENS for preordering and
17 are using it that way.

18 We still do get the P/SIMS download that we
19 put in a database we call LUDM (phonetic), local --
20 gee whiz; what was that? I can't even remember -- but
21 that's -- we've put it in that database, and we
22 integrate it to our -- what's called here the AT&T
23 integrated front-end system.

24 This is a new system that we're coming up on
25 line with now. Its other name is BLISS. Great name

1 for an interface. It's our business local integrated
2 support system. In past years we've had a host of
3 systems out there. Each of the business units would
4 have potentially a different front-end system that
5 their service reps worked with. We're trying to get
6 to a common system. BLISS is that system that's being
7 implemented across the business units this year and
8 next.

9 **COMMISSIONER DEASON:** Do you all have
10 someone whose responsibility it is to come up with
11 these acronyms? (Laughter)

12 **MR. BRADBURY:** I have had no idea.

13 **COMMISSIONER DEASON:** Okay. Pretty
14 ingenious, some of them.

15 **MR. BRADBURY:** Some of them are. BLISS, as
16 you see, talks to an order manager, and then the next
17 thing over an order gateway. It's got the name ECIP
18 on it, ECIP. That's electronic communications
19 integration platform.

20 We've built three different versions of that
21 over the last three years. When it first came up, we
22 were using what we called ECIP-1. We're now on
23 ECIP-2, and ECIP-3 is tied to the BLISS development
24 and being implemented as we speak. So we've gone
25 through quite a few systems on our side of the

1 interface over the last three years.

2 We do maintain the capability of using
3 EDI-PC. One of the things I want to show you that's
4 different here between EDI -- and I'll use BLISS --
5 BLISS works over EDI. And we talk to BellSouth's EDI
6 gateway.

7 You'll notice that in BLISS or an EDI
8 interface you've got the two gateways that we were
9 talking about before. I've got my system on my side.
10 It's separate from BellSouth's. I can build all of
11 the functionality and editing capability of that
12 interface that I want to make it be mine.

13 If you use the EDI-PC interface, you'll see
14 that there's no gateway on the CLEC's side of this
15 diagram. This is a PC stand-alone provided by a
16 third-party vendor that BellSouth has given the
17 specifications to. You buy this package from them and
18 you use it. Okay. So you can't really effectively
19 add a lot of edits to that aren't already in it.

20 So you're -- then you're using this, you're
21 dependent on the edits that come with it, which may
22 not be as robust as what you would build yourself. So
23 it's -- while it still uses an EDI format, it is
24 different from a full EDI operation.

25 Sharon, we can go to the next.

1 Again, here's -- you see our integrated
2 front-end system again, BLISS. Here we're talking to
3 BellSouth's TAG interface. The gateway we're talking
4 to here is TAG instead of the EDI gateway. We're
5 using this for preordering, so you see it's
6 preordering. We're not using the leg down here of TAG
7 that is designed for ordering.

8 So what we're doing is taking preordering
9 TAG information using our ECIP and BLISS systems to
10 integrate that with the EDI ordering that you saw on
11 the previous page to send an EDI order back. So we're
12 doing that integration on our side. Others may elect
13 to take and use the two pieces of TAG and integrate
14 them on their side. We do still place an awful lot of
15 orders by telephone.

16 We place all of our trouble tickets today by
17 telephone, although we have the hardware and software
18 in place to reactivate the ECTA interface if we wanted
19 to or when we reach that critical mass that makes it
20 economically efficient to do that. And we looked at
21 TAFI and are not using that.

22 All right. I'd like to move now into the
23 preordering section.

24 **COMMISSIONER DEASON:** Before you leave that,
25 how do you -- you just do it by telephone -- and I'm

1 talking about the trouble tickets. Do you have some
2 type of internal system where you keep track of those
3 so you can determine the time period it takes to
4 reconcile a --

5 **MR. BRADBURY:** Yes, we do.

6 **COMMISSIONER DEASON:** -- trouble ticket and
7 that sort of thing?

8 **MR. BRADBURY:** We have a -- that's one of
9 the reasons we do that. We have a standard process on
10 our side that makes use of a trouble report system.
11 We enter our troubles into that system so that we can
12 keep track of what our customers' trouble conditions
13 were.

14 We can -- it constantly updates the database
15 that tells what our customers' experience has been
16 throughout time, and then we telephone the report to
17 BellSouth using a script that we have negotiated with
18 them so that that transaction is very -- we call in,
19 we say who we are, and go straight down the script and
20 pass them the trouble.

21 **COMMISSIONER JACOBS:** If I recall, TAFI had
22 the capability of you hooking into a live test on the
23 line; is that correct? Was that --

24 **MR. BRADBURY:** TAFI has a lot of great
25 functionalities, and one of the things -- again, we

1 started talking about maintenance in 1996 and, in
2 fact, that's when we first found out about TAFI. And
3 when we first found out about it, we asked BellSouth,
4 please provide us the TAFI functionality over the
5 electronic bonded interface.

6 So we've had that request on the table with
7 them since April of 1996. We don't have it yet. It
8 appears that maybe sometime a couple years down the
9 road that might happen. It's been technologically
10 possible for the entire period of time.

11 **COMMISSIONER JACOBS:** Now, absent that
12 capability, I assume that you're doing something
13 before you call in. Have you gone through and done
14 your own live tests or are you --

15 **MR. BRADBURY:** I can't -- with the
16 configuration I have now, I can't look into
17 BellSouth's network and conduct any tests.

18 **COMMISSIONER JACOBS:** Okay. So they have to
19 do that on the other end.

20 **MR. BRADBURY:** Right.

21 **COMMISSIONER JACOBS:** And if I recall, one
22 of the other LECs yesterday -- I think it was GTE --
23 said that they expect that the CLEC would have done
24 that before they called.

25 **MR. BRADBURY:** What we can do is -- you

1 know, with this script we've negotiated, we've asked
2 all of the questions of our customer that BellSouth
3 needs the answers to when we call them.

4 **COMMISSIONER JACOBS:** Okay.

5 **MR. BRADBURY:** But since I don't have any
6 physical connectivity to BellSouth's network if I'm
7 dealing with a resale customer, I can't test that, do
8 a test.

9 If I had -- you know, with the EBI
10 interface, if it had the full functionality, I could
11 do all of it myself and never even have to talk to
12 BellSouth.

13 Again, I've got a section at the end; we'll
14 see several slides on maintenance and make this
15 explanation a little clearer at that point.

16 Mentioned earlier that we had done testing
17 and we have the TAG interface for preordering up and
18 running in BellSouth's production machine and AT&T's
19 production machine. We're only using two of the
20 transactions currently; the address validation and the
21 customer service record retrieval. And the business
22 unit that's using this right now is our AT&T digital
23 link product line. This is our -- it's a large
24 customer.

25 We already have a physical connectivity

1 between that customer's PBX and our 4ESS machine. So
2 there's a lot of things that we're not interested in
3 about that customer that is in BellSouth's database.

4 An interesting thing about TAG, it's been
5 available for preordering use since August of last
6 year, yet BellSouth has produced absolutely no
7 operational data about its operation for preordering.

8 Similarly, it's been available for ordering
9 use since November of last year. On the March
10 flow-through report, there were two TAG orders, both
11 of which failed to flow throw because of BellSouth
12 programing errors. So TAG really, in my estimation,
13 is not a commercially available interface today.

14 Mr. Stacy talked about he's got seven folks
15 who are going to come up on it here in the next 30
16 days or so. That may be fine, but at this point in
17 time, there's no operational data to support the fact
18 that TAG has any commercial operations.

19 **COMMISSIONER DEASON:** How many orders have
20 you placed through TAG?

21 **MR. BRADBURY:** We don't use TAG for
22 ordering.

23 **COMMISSIONER DEASON:** So it's kind of hard
24 to get information from BellSouth as to whether it's
25 working, isn't it? I mean, you say you want

1 information, but you've not used it.

2 **MR. BRADBURY:** I'm using it for preordering.

3 **COMMISSIONER DEASON:** I'm asking you about
4 ordering, and you're --

5 **MR. BRADBURY:** For ordering, since I'm not
6 using it, I can only look at the information BellSouth
7 produces about who is using what interfaces, the
8 flow-through. There have been no data for TAG in the
9 flow-through report until March when there were two
10 orders placed by someone.

11 **COMMISSIONER DEASON:** And you want somebody
12 else to be the guinea pig before you do it --

13 **MR. BRADBURY:** No. This is just not an
14 interface I'm going to use for ordering. We're doing
15 the EDI interface for ordering. But it appears from
16 BellSouth's data that there is no one in commercial
17 production through the end of March for ordering using
18 TAG.

19 **COMMISSIONER JACOBS:** Is this something that
20 ATTIS or someone like that should undertake?

21 **MR. BRADBURY:** No, sir. I think -- from
22 what I hear from the states, there are going to be
23 people using it. If you've got this large customer
24 that's going to move from the ordering vehicle they're
25 using to your LENS or an EDI-PC to this, you should

1 start to see data in the flow-through reports about
2 TAG in the future; but the absence of data today just
3 tells me that there's nobody using it.

4 **COMMISSIONER JOHNSON:** Why did you all
5 decide not to use the TAG methodology, or whatever
6 it's called, for ordering what --

7 **MR. BRADBURY:** Because we were already using
8 the EDI ordering interface. The two interfaces, EDI
9 and TAG, for ordering have the same functionality.

10 **COMMISSIONER JOHNSON:** Why would someone --
11 I'm just trying to better understand those, too, then,
12 and I know that Mr. Stacy said that they were similar;
13 they just use different software. I thought I had
14 some notes.

15 But just better understanding the two, I'm
16 assuming that those seven customers that he referred
17 to, weren't they EDI but they're switching over to
18 TAG?

19 **MR. BRADBURY:** Mr. Stacy said yesterday that
20 they were LENS switching to TAG.

21 **COMMISSIONER JOHNSON:** Oh they were LENS,
22 and LENS isn't integratable --

23 **MR. BRADBURY:** Correct.

24 **COMMISSIONER JOHNSON:** But EDI is
25 integratable, so --

1 **MR. BRADBURY:** EDI mainframe is
2 integratable. EDI-PC is also not integratable.
3 That's the point I tried to make earlier.

4 **COMMISSIONER JOHNSON:** Okay. Well, then
5 what's the difference in the two? Why would you need
6 a TAG? TAG is a -- I thought TAG was kind of like the
7 next step, more advanced technology. Why would one go
8 to TAG at all? Why is it necessary? So it may not
9 matter if it works or not if EDI does, you know. So
10 what's --

11 **MR. BRADBURY:** Mainframe EDI -- and, Bill,
12 you can correct me if I'm wrong -- I think the only
13 two regular users, or even reasonably regular users of
14 mainframe EDI, have been AT&T and MCI on occasion. We
15 talked to the other people who -- there just aren't
16 any people making use of mainframe EDI. You know,
17 it's expensive. It's designed for large carriers.
18 TAG covers a much broader scope of carriers.

19 **COMMISSIONER JACOBS:** It was web based?

20 **MR. BRADBURY:** No, it's not web based. You
21 can reach TAG off the Internet, but its -- its
22 technology has a lot of the similarities, and it's
23 also used there, but it is not, you know, a web based
24 thing. It's much better than that.

25 **COMMISSIONER JOHNSON:** So because EDI is --

1 you said it's mainframe EDI, it would be a more
2 expensive proposition for smaller carriers and
3 providers, and that's why they're developing, you
4 would think, the TAG, to accommodate mid to smaller
5 users?

6 **MR. BRADBURY:** It cover a much -- yeah. It
7 allows a much larger scope of the CLEC industry to
8 have an integrated interface.

9 **COMMISSIONER JOHNSON:** Otherwise those CLECs
10 currently probably would have been using LENS, and
11 that was not integratable?

12 **MR. BRADBURY:** Correct.

13 **COMMISSIONER JOHNSON:** Okay. I'm following
14 you. Thanks.

15 **COMMISSIONER CLARK:** What makes TAG less
16 expensive or more attractive to the medium to small
17 carriers?

18 **MR. BRADBURY:** Okay. TAG generally runs on
19 today's modern world of information technology called
20 client server. These things are, you know, not much
21 bigger than your desktop PCs -- it can be real
22 large -- but it's a much more flexible architecture.
23 It's much cheaper. Those machines don't cost what a
24 large mainframe costs.

25 The software that supports TAG, the CORBA

1 software, is a much more commonly understood software.
2 There are many more programmers around who can deal in
3 CORBA than can deal in the software that supports the
4 integrate -- the interfaces like an EDI full gateway
5 to gateway.

6 **COMMISSIONER CLARK:** Well, then why isn't it
7 to your advantage to change to TAG?

8 **MR. BRADBURY:** I'm already invested in a
9 full mainframe EDI format. I've already made that
10 investment. It has the same functionality that TAG
11 has. There's no -- you know, no incentive for me to
12 go that direction.

13 **COMMISSIONER CLARK:** Okay.

14 **MR. BRADBURY:** (Pause) Due date has been at
15 issue within the preordering arena for some number of
16 years. BellSouth recently added a preorder due date
17 calculation capability in TAG and LENS for resale.

18 I'm uncertain, from the discussion I heard
19 yesterday, whether there's such a capability in TAG
20 for UNEs, and the reason I'm uncertain is Mr. Stacy
21 said, you know, UNEs have this fixed interval and are
22 always going to do that. So I'm not sure if I can
23 calculate that in TAG.

24 But even with a due date calculation
25 capability, we still don't have nondiscriminatory

1 access to due dates with BellSouth. BellSouth, unlike
2 GTE and some of the other CLECs -- or ILECs, doesn't
3 provide a due date reservation capability, where if
4 I'm doing preordering and I get a due date, if I
5 submit an order within X number of hours, that due
6 date is good. You saw GTE talk about that yesterday.
7 That capability doesn't exist with BellSouth. So I
8 only get that due date when BellSouth issues --

9 **CHAIRMAN GARCIA:** But isn't the UNE more of
10 a technical function than necessarily a client issue?
11 In other words, getting the unbundled network element
12 is something that you have to do with -- between you
13 and the new client, not necessarily between you and
14 BellSouth? That's something to be determined by
15 technicians at a future date?

16 **MR. BRADBURY:** No. Getting the UNE is
17 between me and BellSouth.

18 **CHAIRMAN GARCIA:** Right.

19 **MR. BRADBURY:** Okay.

20 **CHAIRMAN GARCIA:** But the due date there, if
21 I remember correctly the presentation, is they get
22 back to you in two days for that span, and then they
23 confirm that, and then you're able to work that into
24 your schedule or -- isn't that how it worked?

25 **MR. BRADBURY:** That has not been our

1 experience with it to date. Okay. BellSouth has not
2 made consistently the interval -- the target intervals
3 that are in their interval guide. We've not been able
4 to depend on them making a loop, a UNE loop, available
5 in seven days.

6 **COMMISSIONER DEASON:** I have a question.
7 Your concern that there is not a due date reservation
8 capability in, I take it that what you would like to
9 have is that when you go through ordering and you get
10 an estimated due date, that you want that spot
11 reserved so that that installation can take place on
12 your indicated reservation date; is that correct?

13 **MR. BRADBURY:** If my -- I'm getting that due
14 date while I'm doing my preordering work with my
15 customer. What I've been asking for for three and a
16 half years is if I give you an order within a
17 reasonable period of time after that, eight hours or
18 less, if that due date that I obtained in preordering
19 would still be good whenever -- within the next eight
20 hours, I submit to you a good order.

21 **COMMISSIONER DEASON:** But aren't you asking
22 them basically --

23 **MR. BRADBURY:** The reason--

24 **COMMISSIONER DEASON:** Let me ask my
25 question, and you can explain.

1 Aren't you basically then asking them --
2 because every time you do a preorder, you're not going
3 to do an order, and every time you do an order, you're
4 not going to get a firm order.

5 So if you have that reservation, isn't it
6 kind of analogous to selling more seats on a airplane
7 than actually -- because you know that some people
8 aren't going to show up -- are you asking them to give
9 you a reservation date, and then if everything flows
10 through, they may have to cancel some of those --

11 **MR. BRADBURY:** I would expect that to be
12 very small. Again, I'm -- here I would be dealing
13 with a customer who is saying, I want service. I'm
14 taking the order from the customer. I have a firm
15 order from the customer before I obtain that due date
16 and reservation in the computer mode.

17 Then what I'm into is managing my process to
18 get that order clean to BellSouth within whatever that
19 window is. Let's call it four hours. At the end of
20 that four hours, that reservation vanishes.

21 **COMMISSIONER DEASON:** So you basically --
22 what you want then --

23 **MR. BRADBURY:** Only --

24 **COMMISSIONER DEASON:** -- is when you get
25 that reservation, you want it to be good for at least

1 a period of time that if you process that order within
2 that period of time, you know that's a good date.

3 **MR. BRADBURY:** That's correct.

4 **COMMISSIONER JOHNSON:** And they don't
5 provide that now? Tell me how it works now.

6 **MR. BRADBURY:** How it works now is, I talk
7 with my customer. I see that due date. I tell the
8 customer then. I submit my order. And let's say I
9 submit my order and it gets to BellSouth in three and
10 a half hours, and BellSouth FOCs that order, puts the
11 order into their system.

12 In that three and a half hours' time, other
13 people, BellSouth, other CLECs, have been placing
14 orders in that same central office or for that same
15 work group. The due date that I saw three hours ago
16 may not be available now because of other orders that
17 have processed in that period of time.

18 **COMMISSIONER JOHNSON:** And --

19 **MR. BRADBURY:** And so what happens then --

20 **CHAIRMAN GARCIA:** -- who are the --

21 **MR. BRADBURY:** -- is when I get the --

22 **CHAIRMAN GARCIA:** Who are the orders you're
23 worried about? Other companies, or BellSouth --

24 **MR. BRADBURY:** Both. There's multiple --

25 **CHAIRMAN GARCIA:** Don't they all have the

1 same -- don't they all end up at the same place?

2 **MR. BRADBURY:** Because of the difference in
3 process, BellSouth -- when BellSouth submits that
4 order, when -- they don't have the delay, the
5 potential delay, that the CLEC community has.

6 **COMMISSIONER JOHNSON:** Could you explain the
7 delay again. I don't know why I'm missing this point.
8 But what's the delay that the CLECs have that
9 BellSouth --

10 **MR. BRADBURY:** Okay. When BellSouth submits
11 an order using -- let's use RNS, the RNS system, that
12 order automatically flows over to their SOC system
13 within -- in near realtime and is -- unless they've
14 really screwed up their order, is accepted right then.

15 And so the period of time between when you
16 have worked with a customer and the order is accepted
17 by SOCS is minutes. The period of time for a CLEC,
18 depending on the type of ordering interfaces they're
19 using, could be -- at a minimum, right now with EDI
20 it's a minimum of 15 minutes, which is not too bad.
21 Actually that's just to get at their front gateway --
22 there's two other gates in the LEO LESOG that it's
23 actually a 30-minute minimum that it's going to get
24 there if you do absolutely nothing wrong and you do
25 everything right.

1 Some -- you know, that's for me with an EBI.
2 If you're using some of the other interfaces, there
3 may be longer delays.

4 **COMMISSIONER JOHNSON:** So it's just getting
5 it processed is --

6 **MR. BRADBURY:** Right.

7 **COMMISSIONER JOHNSON:** -- a 30 to --

8 **MR. BRADBURY:** 30 to something.

9 **COMMISSIONER JOHNSON:** -- 30 to
10 something-minute wait, whereas BellSouth is processed
11 automatically. So they get in the queue -- there's
12 is --

13 **MR. BRADBURY:** Their order --

14 **COMMISSIONER JOHNSON:** -- more
15 predictability --

16 **MR. BRADBURY:** Right.

17 **COMMISSIONER JOHNSON:** -- with respect to
18 getting in the queue. Okay.

19 **COMMISSIONER JACOBS:** And not until you --
20 the date is not official until you get accepted in
21 SOCS, right?

22 **MR. BRADBURY:** That's correct.

23 **COMMISSIONER JACOBS:** And, of course,
24 yesterday -- if you edited out of SOCS, you still
25 haven't gotten your reservations yet.

1 **MR. BRADBURY:** That's correct. That would
2 also be true for BellSouth. If their order falls out
3 of SOCS, their due date isn't good either. Okay.

4 So I don't want to --

5 **COMMISSIONER JOHNSON:** And the solution --
6 I'm sorry. Go ahead.

7 **COMMISSIONER JACOBS:** It sounds like, then,
8 you're getting a real date -- well, let me ask you
9 this -- ask it this way: Once -- whatever time delay
10 has -- has it expired, you've gotten your date, how
11 effective are you in, let's say, in EDI in getting
12 that back now; you know, do you then get back the real
13 date within some reasonable period of time?

14 **MR. BRADBURY:** That's the firm order
15 confirmation interval. And I've got a slide much
16 further on to show you what current performance is on
17 that. It varies from eight hours to several days.

18 **COMMISSIONER JOHNSON:** And how do the
19 other -- you said GTE and the other ILECs have a
20 different --

21 **MR. BRADBURY:** Some other ILECs have a
22 process that allows you to -- as you're doing a
23 preorder and come upon a due date, you can reserve
24 that due date, and if you --

25 **COMMISSIONER JOHNSON:** Before the FOC --

1 **MR. BRADBURY:** -- successfully submit an
2 order within a window period of time -- and you saw
3 GTE yesterday. If you reserve one by noon, if you
4 submit your order by 5:00, you're good. If you
5 reserve one after noon and if you order before noon
6 the next day, it's good.

7 So there's a window in there. The
8 reservation disappears so you're not looking up many
9 times beyond what we think is a reasonable request.

10 Okay. Sharon.

11 We had some discussion yesterday about
12 customer service record information. We can retrieve
13 that information using a number of databases.
14 However, that information is not parsed today the same
15 way that BellSouth is capable of parsing and does
16 parse it for itself as you saw in the RNS
17 demonstrations yesterday.

18 Okay. Sharon.

19 **CHAIRMAN GARCIA:** Go back. Tell me what
20 exactly you mean by this. Walk me through this.

21 **MR. BRADBURY:** Okay.

22 **CHAIRMAN GARCIA:** What do you want, I think
23 would be the better question.

24 **MR. BRADBURY:** Okay. With parsing, I will
25 be able -- if I'm doing an order where I need to send

1 back to BellSouth information about the customer that
2 BellSouth already has, okay -- in the customer service
3 record, so I have to build that order that replicates
4 that customer service record.

5 And this is true of a migration. With --
6 what we used to do with migrations is specified, okay,
7 because there are certain things that are in that
8 customer record I don't want when I migrate a
9 customer. For example, we didn't want inside wiring,
10 okay. But I had to replicate everything else that was
11 in that customer's service record back to BellSouth.
12 Okay.

13 Without parsing, I had to take that block of
14 text, read it -- I have -- my people have to read
15 those codes that BellSouth's people have, and read
16 those same codes, turn them into whatever I'm putting
17 into my system; because I don't put those -- my people
18 don't put codes into their system; they put English.

19 So I have to do an English -- a code to
20 English on a manual basis, put it into my system,
21 which does then an English back to code to send to
22 BellSouth.

23 With a full parsing capability, I can accept
24 that machine -- code, machine to machine, put it over
25 into my order, show my rep that in English. They

1 never have to enter it because it's already in there,
2 but you avoid errors.

3 The process I've got now it's easy for us to
4 miss something that's on a customer service record or
5 to input it -- reinput it incorrectly converting it
6 from their code to my English; I may retype it wrong.

7 **COMMISSIONER DEASON:** If you know what the
8 codes are, can't you do that yourself?

9 **MR. BRADBURY:** No; because, again, my people
10 don't type in code. Just like Bell's people in RNS
11 type in English, our front ends type in English.

12 **COMMISSIONER DEASON:** I'm talking about --

13 **MR. BRADBURY:** -- (inaudible overlap) -- the
14 customer service record --

15 **COMMISSIONER DEASON:** -- if you --

16 **MR. BRADBURY:** -- in code in a format that I
17 can't machine load it, so I have to display it. They
18 have --

19 **COMMISSIONER DEASON:** Well, I guess my
20 question is, whose burden is that? Is it your
21 burden -- if they give you the information for you to
22 take it and put it in whatever format or language or
23 protocol you want, or is it their responsibility to
24 serve it to you the way you want it, in the format you
25 want, in the protocol you want?

1 **MR. BRADBURY:** Okay. I believe it's their
2 responsibility to provide it to me the same way that
3 they are providing it to their own people. And you
4 saw yesterday that they provide to the RNS system a
5 customer service record that is parsed in such a
6 fashion that the RNS system can put the English on it
7 to display. Okay.

8 I'm not getting that. I'm getting a version
9 that is only code, blocked together such that I can't
10 do what the RNS people have done as easily. Now, I
11 would be lying to you if I said I can't do something
12 with that record. I can do something with it, but I
13 can't do it as efficiently because of the way -- as
14 BellSouth does it in our nest because of the way it
15 comes to me. They have the capability of giving it to
16 you parsed, broken into segments that are machine
17 handleable very easily.

18 **COMMISSIONER JOHNSON:** And that's what they
19 do --

20 **MR. BRADBURY:** But they --

21 **COMMISSIONER JOHNSON:** -- for themselves?

22 **MR. BRADBURY:** That's what they do for
23 themselves when they submit that information to RNS.

24 **COMMISSIONER JOHNSON:** And you want them to
25 do it for you and just charge you for it? It's

1 cheaper for them to do and then just charge you for it
2 as opposed to you to get it not parsed and --

3 **MR. BRADBURY:** I don't have any -- any feel
4 for charging on it.

5 **COMMISSIONER JOHNSON:** Well --

6 **MR. BRADBURY:** I work on the technical side.

7 **COMMISSIONER JOHNSON:** Aha.

8 **COMMISSIONER DEASON:** Well, you see,
9 yesterday it seemed to me when the BellSouth
10 individual indicated that they provide the information
11 to -- they're kind of the support group, and they
12 provide it in whatever format those other
13 organizations within BellSouth that want it.

14 And there was one organization that did
15 complex business that basically wanted to do it in
16 code because they had the expertise and training and
17 it was more cost-effective for them to do it than it
18 was to set up the capability to put it in English, for
19 lack of a better term, but that they did that for
20 another group that wanted it that way.

21 And I got the impression that it was like he
22 was treating those groups within BellSouth as a
23 customer like he treats you as a customer in that it's
24 a question of if they want it and are willing to pay
25 for it type situation. And am I misunderstanding how

1 that works?

2 **MR. BRADBURY:** That is what Mr. Stacy said.
3 What I find wrong with that is that is all BellSouth.
4 This line that Mr. Stacy has drawn on there between
5 BellSouth retail and BellSouth wholesale doesn't mean
6 anything in the context that we're here in. That's
7 all BellSouth. That retail is not a separate legal
8 entity. It's the same organization. It's BellSouth.
9 And their obligation is for BellSouth to provide to
10 competitors what they're providing to themselves.

11 That's Bradbury, nonlawyer, but that's how I
12 read the Act. And that's all BellSouth; that
13 distinction between BellSouth retail and BellSouth
14 wholesale is meaningless.

15 **COMMISSIONER DEASON:** So if they spun that
16 off into a separate subsidiary and had their own
17 entity within, you wouldn't have a reason to complain,
18 then, in that --

19 **MR. BRADBURY:** It would certainly change the
20 ground rules.

21 **COMMISSIONER DEASON:** Oh; okay.

22 **MR. BRADBURY:** All right. Talk about
23 response times: How quickly do I get information back
24 as compared to how BellSouth gets information back.

25 BellSouth reports these response times in

1 their SQM reports in other states. I don't think they
2 have a regular reporting here in this state that I
3 recall.

4 What I have done is taken the information
5 that they report and created a weighted average across
6 all of the transactions, because they do it by several
7 different databases.

8 Historically you can see here a difference
9 around 3%, three seconds per transaction, weighted
10 transaction, November, December last year. It is an
11 abnormality, I think, in January where it looks like
12 there's only one second difference. There were a lot
13 of things very funny about that particular month's
14 data, and I'll just give you one as an example.

15 Historically in this data, CLECs make
16 preorder inquiry requests 10 or 12 times per
17 mechanized order. For the month of January, that
18 ratio went up to 20 times. So there's something a
19 little screwy, I think, in the data collection there.
20 So historically there's been about a three-second --
21 difference on a weighted basis, but I'm doing this 10
22 or 12 times in my conversation with you in this
23 contact that we're having about establishing service
24 or changing your service.

25 Now, each of you probably occasionally makes

1 your own travel reservations; hotel, motel, airline.
2 You know how frustrated you get when you're talking
3 with that rep and they say, I have to wait on my
4 computer. We've been become a very impatient society.
5 One, two, three seconds' delay in a normal
6 conversation is perceived as being poor service.

7 If that happens to me five, six, seven,
8 eight times in a transaction, my feeling about that
9 transaction continues to degrade. So three seconds'
10 difference is important when it occurs 10 times.

11 **COMMISSIONER JOHNSON:** And this --

12 **MR. BRADBURY:** Or any number of times.

13 **COMMISSIONER JOHNSON:** And this preordering
14 response is -- it's all the computer transaction, you
15 getting the data --

16 **MR. BRADBURY:** Correct.

17 **COMMISSIONER JOHNSON:** It has nothing to do
18 with the human beings.

19 **MR. BRADBURY:** Right.

20 **COMMISSIONER JOHNSON:** And what would you
21 say is the cause for that?

22 **MR. BRADBURY:** Well, obviously it does have
23 a cost, and it --

24 **COMMISSIONER JOHNSON:** No; the cause of --

25 **MR. BRADBURY:** Cause --

1 **COMMISSIONER JOHNSON:** -- of the delay.

2 **MR. BRADBURY:** -- of that?

3 **COMMISSIONER JOHNSON:** Just for --

4 **MR. BRADBURY:** I don't really know what the
5 cause is. You know, it's just the difference in how
6 the two systems are operating today, how BellSouth
7 systems are operating for themselves and how the
8 systems they're providing for us are operating for us.

9 **COMMISSIONER JOHNSON:** And the systems that
10 are operating for you all, there's a -- I guess
11 there's a couple extra steps, the diagram -- I mean,
12 the traffic travels a greater distance and through
13 more gateways, for lack of a better word? That may
14 be --

15 **MR. BRADBURY:** Where this measurement is
16 taken?

17 **COMMISSIONER JOHNSON:** Yeah; that's what I'm
18 trying to --

19 **MR. BRADBURY:** Okay. Where this measurement
20 is taken doesn't -- does not build in any delay that
21 occurs on my side of --

22 **COMMISSIONER JOHNSON:** That would be --

23 **MR. BRADBURY:** -- their gateway.

24 **COMMISSIONER JOHNSON:** Yeah.

25 **MR. BRADBURY:** Okay. If there's any delay

1 on my side of that gateway, I'm not --

2 **COMMISSIONER JOHNSON:** That's not counted.

3 That's what I was wondering, if it --

4 **MR. BRADBURY:** No.

5 **COMMISSIONER JOHNSON:** So this is all on

6 BellSouth's side of the --

7 **MR. BRADBURY:** That's --

8 **COMMISSIONER JOHNSON:** -- gateway?

9 **MR. BRADBURY:** -- correct.

10 **COMMISSIONER JOHNSON:** Okay. Thanks.

11 **MR. BRADBURY:** Thank you for the question.

12 There are some other issues around

13 performance measurements with preorder. We talked

14 about the average weighted transaction. Customer

15 service access intervals are longer yet. They

16 traditionally have about a four or five or six-second

17 differential between what BellSouth does.

18 BellSouth -- we get such a transaction

19 typically in about six seconds. They get it in about

20 two. So that particular transaction has a much larger

21 differential, and that's very important, because that

22 particular transaction in the CLEC world represents 50

23 to 60% of all the transactions that are done. For

24 BellSouth, it's only 14 of their transactions. So

25 I've got a transaction that has a longer interval and

1 I use it more often. Okay.

2 The data that's been presented today --
3 again, I've said this earlier -- TAG has been an
4 available preordering interface since August, but
5 there has been no TAG response time data ever
6 presented.

7 Similarly, BellSouth only provides data
8 about its RNS system. It doesn't provide data about
9 the response times that people using DOE to receive
10 information in BellSouth get. Why is that important?
11 That's the business side. You know, BellSouth says,
12 well, you know, in LENS you're getting both business
13 and residence. Well, they're only comparing that
14 against residence.

15 Another measurement is called percent
16 availability. This is, are the systems available for
17 use. The way BellSouth reports this particular one is
18 as a percentage. What's wrong with that? If I see
19 100%, you think we're all getting the same thing. But
20 if my system was scheduled for 100 hours and up 100
21 hours, the BellSouth system was scheduled for 200
22 hours and up 200 hours, who had more availability?
23 The system that was up more hours. But the hours that
24 the systems are up are not presented.

25 So the percentage, while it appears to

1 represent a fair comparison, masks the actual number
2 of hours that might be available between systems.

3 Any other questions on preordering?

4 **COMMISSIONER DEASON:** Can you go back? I
5 guess I missed the point on the percent availability.
6 I understand that if it's the same percent applied to
7 a higher base, one is a greater absolute value than
8 the other. Is that the point you're --

9 **MR. BRADBURY:** Yeah.

10 **COMMISSIONER DEASON:** And how do they
11 determine how many hours one is going to be available
12 for one versus the other?

13 **MR. BRADBURY:** That's -- you know, they
14 determine that themselves, and some of the -- is
15 maintenance needs. You know, you do have to turn the
16 computers systems down at certain hours of the day.

17 At this point in time, as I recall, I think
18 we've got all of the systems pretty much on the same
19 amount of maintenance hours, but they may have other
20 reasons to be out of service. Over the fall last year
21 there were several upgrades to the CLEC systems that
22 didn't occur to the BellSouth systems that took the
23 CLEC systems out of service for periods of eight, 10
24 or 12 hours. Okay. Scheduled, yes. But hours not
25 available, also, yes. Reflected in the measurement?

1 No. (Indicating) You know, there -- if BellSouth
2 systems were up those 10 hours and mine were down,
3 they had more availability for that 10-hour period of
4 time than I did.

5 **COMMISSIONER DEASON:** And so you're saying
6 that you have information that shows they're
7 discriminatory in choosing which system to --

8 **MR. BRADBURY:** No, I don't have it.

9 **COMMISSIONER DEASON:** Oh. You --

10 **MR. BRADBURY:** Without the hours, I don't
11 know what's happening.

12 **COMMISSIONER DEASON:** Oh. So you're saying
13 that the percentage --

14 **MR. BRADBURY:** It's the --

15 **COMMISSIONER DEASON:** -- the percent
16 availability, you're just showing a flaw in the basis
17 of that calculation and what it represents, but you
18 don't have any information to show the actual
19 availability of hours to --

20 **MR. BRADBURY:** No, I do not.

21 **COMMISSIONER DEASON:** -- to show that
22 there's something discriminatory.

23 **MR. BRADBURY:** I do not.

24 **COMMISSIONER DEASON:** Okay.

25 **MR. BRADBURY:** Okay. Over the years

1 BellSouth has developed a number of interfaces for
2 CLECs to use. Many of them don't provide the CLECs
3 with the same ordering capabilities that BellSouth
4 enjoys.

5 What happens when BellSouth elects not to
6 provide CLECs with the same capabilities, then it's
7 got -- then it has to provide those capabilities using
8 people, through the intervention of human people.

9 There are a large number of issues that come
10 out of the integration situation, and we'll try to
11 discuss some of those as we go along.

12 And there are several available interfaces
13 for ordering. We've talked about several of them
14 already today; LENS, which is human to machine,
15 nonintegratable.

16 EDI-PC. It is EDI, but it is also, like
17 LENS, not integratable to the back -- BellSouth's
18 back -- to our back office system on the CLEC side.
19 EDI mainframe is. Has some limitations. Where it has
20 the limitations BellSouth puts a person to fill that
21 gap.

22 TAG API, again, from the data that's
23 available, it really isn't in commercial operation.
24 Two separate interfaces that, with proper
25 documentation, a CLEC should be able to integrate, but

1 as you saw in the Telcordia demonstration yesterday,
2 they haven't done it yet. I'm not sure, you know, if
3 Telcordia, one of the world's greatest software
4 developers, hasn't done it yet, where the other CLECs
5 might be. It's just -- just a question.

6 Sharon.

7 Again, only mechanized, partially
8 mechanized, four complex services. From the data, I
9 don't see any actual mechanization of unbundled
10 element ordering. Okay.

11 Go on to the next one, Sharon.

12 Editing is a big difference between the
13 system that we have available for our use compared to
14 BellSouth. The RNS and DOE systems both have
15 extensive editing capabilities. This allows BellSouth
16 to have some very high flow-through rates. These are
17 the March numbers; 96% for residence and 83% for
18 business.

19 **COMMISSIONER CLARK:** Can we go back for a
20 second to the slide previous to this?

21 **MR. BRADBURY:** Yes, ma'am.

22 **COMMISSIONER CLARK:** Is it your view that
23 BellSouth has fully mechanized their ordering process
24 for those systems? I had understood that theirs
25 wasn't either.

1 **MR. BRADBURY:** Yes, ma'am. I have a
2 different opinion of BellSouth's mechanization
3 capability, and I've got a slide later where I'll talk
4 to that.

5 **COMMISSIONER CLARK:** Okay.

6 **MR. BRADBURY:** Okay. If I'm a CLEC using
7 LENS -- and this is a proprietary interface -- and
8 BellSouth provides all of the editing that's available
9 on that interface; comes out there. Yet in March, the
10 LENS interface didn't detect almost 14,000 orders
11 which contained errors. It allowed a CLEC to think it
12 had submitted a perfectly good order, and it was 18%
13 of the LENS orders are that way.

14 **COMMISSIONER JOHNSON:** Could you explain
15 that CLECs using LENS ordering must rely upon
16 BellSouth to incorporate an on-line edit capabilities
17 because LENS is a proprietary interface -- so what
18 actually happens? Tell me the physical--

19 **MR. BRADBURY:** If I'm working with LENS, I
20 work with LENS and I place an order in LENS --

21 **COMMISSIONER JOHNSON:** So you're on your --

22 **MR. BRADBURY:** I'm on this computer. Okay.
23 And it's connected to BellSouth. Okay. I formulate
24 my order. I submit it. I tell LENS to send that
25 order. LENS, the terminal I'm working with, accepts

1 that order as being valid according to the edits that
2 BellSouth has put forth to edit the "inputer's" work.

3 It goes on into BellSouth's system and hits
4 those LEO and LESOG editors in BellSouth who say,
5 there's something wrong with your order. Well,
6 that -- because BellSouth is providing the LENS front
7 end, it ought to have the same editing capability as
8 the parallel system in BellSouth RNS.

9 RNS is a 96% flow-through system, because
10 the edits that are applied to RNS won't allow that
11 person to release an order that won't flow through the
12 FUEL and SOLAR editors before it goes to SOCS. But
13 here they've provided a very similar interface to the
14 CLECs that doesn't provide that same level of editing
15 to the input personnel. And the CLEC can do nothing
16 about that.

17 **COMMISSIONER JOHNSON:** So --

18 **MR. BRADBURY:** And 72% -- excuse me -- in
19 March, 81% of electronic orders submitted by CLECs
20 were submitted using LENS.

21 **COMMISSIONER JOHNSON:** So how does a CLEC
22 find out that there was an error, and what happens
23 when there's a mistake, or --

24 **MR. BRADBURY:** They receive a reject message
25 for the order that LENS accepted, sometime down the

1 road.

2 **COMMISSIONER JOHNSON:** Then what happens? I
3 mean, how do they rectify --

4 **MR. BRADBURY:** Then they go back into LENS
5 and correct that order according to the instructions
6 that they received in the reject message.

7 **COMMISSIONER JACOBS:** And it won't know --
8 they won't know if that correction was adequate until
9 it goes back to LESOG.

10 **MR. BRADBURY:** Repeats the cycle; that's
11 correct.

12 **COMMISSIONER JOHNSON:** And what kind of time
13 are you -- does that take how much time?

14 **MR. BRADBURY:** I have some data on reject
15 notification times coming up in about two slides.

16 **COMMISSIONER JOHNSON:** Okay.

17 **MR. BRADBURY:** But, again, so for LENS as --
18 you know, BellSouth is really responsible for
19 providing the front-end edits that are being used by
20 the CLECs; and it's clear that those are not edits of
21 the same quality that are available to BellSouth's
22 reps using RNS.

23 For EDI mainframe -- and, again, I'm -- the
24 best I know, AT&T is still the only regular user of
25 EDI mainframe, and that's what -- I'm responsible for

1 those edit capabilities, but I'm dependent on
2 receiving accurate business rules, edit rules and
3 interface specifications to make that work.

4 So, you know, there's a dependency there
5 that it is my job to take that information that I
6 receive from BellSouth and put it into my front-end
7 systems. Okay.

8 EDI-PC --

9 **COMMISSIONER JOHNSON:** Is that a problem --
10 I mean, you state that there are --

11 **MR. BRADBURY:** There are problems with
12 business rules, edit rules, and interface
13 specifications, but I wasn't prepared to bring those
14 problems here to this. I just --

15 **COMMISSIONER JOHNSON:** I just -- I mean, it
16 just strikes me that given the nature of how this is
17 set up, I don't know how -- what else could be done
18 about that.

19 To the extent that -- BellSouth, they do
20 provide you with the business rules, edits, and
21 whatever interface specifications --

22 **MR. BRADBURY:** There is --

23 **COMMISSIONER JOHNSON:** -- as they're
24 developed, right?

25 **MR. BRADBURY:** There is information provided

1 by BellSouth. The quality of it, we have an ongoing
2 dialogue with them as to whether it's adequate or not.

3 **COMMISSIONER JOHNSON:** Okay.

4 **MR. BRADBURY:** Okay. EDI-PC users, though,
5 different from EDI mainframe users, are again
6 dependent on what BellSouth told their third-party
7 vendor to put into the system to do edits. Okay.
8 And, again, from the flow-through reports, you see in
9 March that about 19% of orders came from EDI. Again,
10 based on my knowledge of whose mainframe and whose PC,
11 I would say most of that is coming from PC based --

12 **COMMISSIONER JOHNSON:** But what --

13 **MR. BRADBURY:** -- and they're dependent upon
14 BellSouth.

15 **COMMISSIONER JOHNSON:** What do you -- how --
16 I'm assuming that the way you're stating this is
17 you're stating it as if it's a bad thing, like the
18 last one there that the EDI-PC that they're
19 dependent -- that BellSouth has to direct the EDI-PC
20 vendor to incorporate edit capabilities; but I'm not
21 seeing -- I'm not having a problem with that.

22 Why is that problematic? I mean, it's their
23 system, you know, that --

24 **MR. BRADBURY:** The only problem is in doing
25 that, the edit capability that they provide through

1 that interface and their third-party vendor should be
2 equal to the edit capability they provide to
3 themselves, and I'm just saying based on the data,
4 that does not appear to be true.

5 **COMMISSIONER JOHNSON:** Oh. So you're going
6 to the -- I see what you're -- okay. It's not a
7 process; it's whether or not they're the same or --

8 **MR. BRADBURY:** That's right.

9 **COMMISSIONER JOHNSON:** -- if there's parity.

10 **MR. BRADBURY:** Right.

11 **COMMISSIONER JACOBS:** On the business rule
12 edits, when you enter into the arrangement, do you
13 get -- yesterday there was mention of this huge
14 manual. You get that, and what you're saying is that
15 that's not adequate?

16 **MR. BRADBURY:** We continue to find
17 inaccuracies, omissions, and contradictory information
18 within that documentation. We have an ongoing
19 dialogue with BellSouth about that both individually,
20 AT&T to BellSouth, and often industry players to
21 BellSouth.

22 **COMMISSIONER JACOBS:** Okay.

23 **COMMISSIONER DEASON:** I have a question
24 about LENS. BellSouth does not utilize LENS, correct?

25 **MR. BRADBURY:** Correct.

1 **COMMISSIONER DEASON:** Okay. So what do you
2 compare -- when you're using LENS, what do you compare
3 to what BellSouth uses to see if they're as comparable
4 as far as editing capabilities?

5 **MR. BRADBURY:** It's used in virtually the
6 same fashion as BellSouth's RNS system. The
7 architecture is the -- is virtually identical. And I
8 could go forward to a slide and show you.

9 **COMMISSIONER DEASON:** If you're going to get
10 to it eventually, that's --

11 **MR. BRADBURY:** It's several slides back, but
12 I will get there and show, you know -- and show you --

13 **COMMISSIONER DEASON:** That's fine.

14 **MR. BRADBURY:** -- how they're the same, very
15 similar. And you would, therefore, expect similar,
16 but we're not seeing that.

17 **COMMISSIONER DEASON:** So you're just saying
18 that the tools you're using don't have the
19 capabilities that the representatives in BellSouth
20 were using --

21 **MR. BRADBURY:** Yeah.

22 **COMMISSIONER DEASON:** Is that your bottom
23 line?

24 **MR. BRADBURY:** Yeah. And in the particular
25 case of LENS, BellSouth is providing that tool to the

1 CLECs. You know, they're -- you know, they put that
2 one out there themselves, and yet it doesn't have the
3 same capabilities to edit a service rep's work. It's
4 a big -- to me that's a big gap. Okay.

5 What happens when these edits fail? If they
6 fail to detect an error, we use -- CLECs are
7 experiencing very long delays in receiving the
8 rejection notices.

9 This is the data for March. (Indicating)
10 These are orders that were submitted electronically,
11 encountered an error. How long on average did it take
12 the CLECs to know about that error? For resale
13 residence, it was 56 hours and 34 minutes; business,
14 22 hours and 43 minutes, and for a UNE order, 77 hours
15 and 56 minutes.

16 **COMMISSIONER DEASON:** Can you give us a feel
17 of what type of errors occur? Is it incorrect
18 information in a field that won't be accepted, or some
19 verification that didn't take place that should have
20 taken place before the order -- I mean, what type
21 errors result in these rejects?

22 **MR. BRADBURY:** I don't have -- there's a
23 very nice letter out from BellSouth right now that
24 I'll make -- that lists the top 20 -- or 12 and how a
25 CLEC might go about solving those, and I'll make that

1 letter available to you.

2 **COMMISSIONER DEASON:** Okay. I guess then my
3 next question is, has AT&T attempted to determine what
4 are causing these rejects and put some type of a -- on
5 the front end before you actually submit the order, do
6 some type of editing yourself.

7 **MR. BRADBURY:** Okay. Here again I need to
8 split things up. In the case of LENS, I'm not using
9 that. Okay. And if I were using it, there's no
10 capability to do what you said.

11 ED I, I am analyzing the errors that come
12 back to me comparing that to the documentation that I
13 have from BellSouth about what I should be putting in
14 and having this dialogue. Your documentation says, do
15 this; I did it; it failed. Or I didn't follow your --
16 we're trying to find a -- I didn't follow your
17 documentation, so I'm at fault. We are doing that
18 discussion day in and out, because as an EDI mainframe
19 user, I am responsible for putting my front-end edits
20 in.

21 **UNIDENTIFIED SPEAKER:** (Inaudible comment
22 away from microphone.)

23 **MR. BRADBURY:** Yeah. This is -- again, this
24 is CLEC aggregate data, not AT&T-specific data.

25 Thank you, Sharon.

1 One of the reasons that we have such long
2 delays in receiving the fact that our orders were --
3 the CLECs' orders were incorrect appears to be that
4 BellSouth manually processes nearly one-third of all
5 the error notices that it sends back to CLECs for
6 orders that CLECs submitted electronically, but there
7 is human intervention in the reject process.

8 Sharon, we'll go on to the next slide.

9 **COMMISSIONER DEASON:** Well, let me ask: So
10 what? I mean, what's the significance? Because
11 there's --

12 **MR. BRADBURY:** Because --

13 **COMMISSIONER DEASON:** -- human intervention?
14 Some people will say, well, I'm getting personalized
15 attention and that's great. Other people would say,
16 is it because of the delay. Are you indicating that
17 you think they're doing it that way just to increase
18 the delay time?

19 **MR. BRADBURY:** No, I don't think that's --
20 don't think that's their intention is --

21 **COMMISSIONER DEASON:** Well, what's the
22 point, I guess --

23 **MR. BRADBURY:** The impact of having -- not
24 having a fully automated reject process is that it
25 lengthens the time. Okay.

1 BellSouth originally had no automation in
2 the process. I mean, this is an improvement. There
3 was originally no automation in that reject process,
4 but at this point in time it still involves, you know,
5 human intervention in 32% of the orders.

6 **COMMISSIONER DEASON:** But the bottom line,
7 though, is that an --

8 **MR. BRADBURY:** At the time BellSouth --

9 **COMMISSIONER DEASON:** -- error is an error,
10 and it's your input that is the error.

11 **MR. BRADBURY:** But once I've committed that
12 error, BellSouth has an obligation to tell me about it
13 in a timely fashion, and that's not happening. Okay.
14 BellSouth tells itself about its errors in a timely
15 fashion.

16 **COMMISSIONER JACOBS:** What are those
17 numbers?

18 **MR. BRADBURY:** When BellSouth -- if you
19 submit an order from RNS that is subsequently edited
20 in SOCS that we saw yesterday -- Mr. Stacy talked
21 about yesterday -- that drops out to a centralized
22 group that takes care of those, and that happens no
23 longer than 24 hours on a batch process, but they
24 actually have a 30-minute -- they have a 30-minute
25 capability to do that.

1 Similarly on business orders, the
2 explanations that I've had from BellSouth in the past
3 is the business rep makes an error in a DOE order; DOE
4 accepts, sends to SOCS, and SOCS edits and finds that
5 error. That error is returned to the center that sent
6 it in, and it's returned -- the last I saw it was
7 returned -- on a nightly batch is a message called the
8 Questionable Activities Report, or something of that
9 nature. And so the worst thing that happens is
10 overnight.

11 These definitely --

12 **COMMISSIONER JOHNSON:** And in BellSouth's --

13 **MR. BRADBURY:** -- (inaudible overlap) --
14 longer than overnight.

15 **COMMISSIONER JOHNSON:** In BellSouth's own
16 internal systems, the process is electronic as opposed
17 to manual? You noted here that the reason why you
18 believe the delays for --

19 **MR. BRADBURY:** I really --

20 **COMMISSIONER JOHNSON:** -- the CLECs is
21 because it's manual and not electronic. Is it
22 different for BellSouth?

23 **MR. BRADBURY:** The reject notice drops out
24 to them. I'm not sure on where it goes, to their
25 trouble error -- and error correction center, but it

1 drops out at worst on a printer in a reasonable period
2 of time.

3 Again, they have -- I think there's a
4 30-minute objective that they had in the RNS side to
5 correct errors when they thought -- that when an error
6 occurs, SOCS drops out to this center, they have 30
7 minutes to correct it.

8 **COMMISSIONER JOHNSON:** For themselves or
9 for --

10 **MR. BRADBURY:** For themselves. This is
11 their process.

12 **COMMISSIONER JOHNSON:** Okay. And they --
13 you have something that shows that they meet their
14 objectives?

15 **MR. BRADBURY:** No. BellSouth does not
16 provide any information on reject notice intervals for
17 BellSouth. They claim they don't have a parity --
18 they don't have an analog in their process to this
19 measurement.

20 I disagree with them. The FCC disagrees
21 with them.

22 **COMMISSIONER JOHNSON:** So there is no --

23 **MR. BRADBURY:** So there is no comparative
24 data available.

25 **COMMISSIONER JOHNSON:** To the extent that

1 there was and it demonstrated the same amounts of
2 time, then, that at least you'd have your parity.

3 **MR. BRADBURY:** If it demonstrated that.
4 But, again, from the information they've told us about
5 their process, it's a 30-minute process on the
6 residence side, is of the objective side.

7 This is a little longer view of the same
8 thing. (Indicating) You see March data on the far
9 right. This gives you a feel for the trend. It
10 doesn't look like an improving trend.

11 On the bottom you see the percent of
12 mechanically or electronically submitted orders that
13 are rejected and BellSouth has to inject themselves in
14 that process with a human intervention. You see the
15 last three months, 34, 29, 32%, so still a very high
16 level of manual intervention in rejecting electronic
17 orders.

18 **CHAIRMAN GARCIA:** I guess we asked this
19 before. Maybe you'll -- what is the errors that are
20 being made? I mean, you said BellSouth gave you a
21 letter.

22 **MR. BRADBURY:** There's a letter about the
23 CLECs' most common errors, yeah; and I'm -- you know,
24 be glad to give it -- and in each of the flow-through
25 reports they do -- they also -- there's an error

1 analysis summary that lists those, too. I don't have
2 them memorized, but we can make that information
3 available to you.

4 **CHAIRMAN GARCIA:** But obviously it's not in
5 your interest to get more errors, is it, because -- I
6 mean --

7 **MR. BRADBURY:** Absolutely not; no. My --

8 **CHAIRMAN GARCIA:** Let me understand --

9 **MR. BRADBURY:** -- my interest is to submit
10 clean orders --

11 **CHAIRMAN GARCIA:** Obviously -- (Inaudible
12 overlap) --

13 **MR. BRADBURY:** -- everybody -- (Inaudible
14 overlap) --

15 **CHAIRMAN GARCIA:** But you're giving us the
16 problems here. I mean -- (Inaudible overlap) --

17 (Court reporter asked for clarification.)

18 **MR. BRADBURY:** Pardon me. I'm sorry.

19 **CHAIRMAN GARCIA:** I'm sorry. I assume that
20 it's not in your interest to get rejects. That said,
21 is there any retraining of your people when they get
22 these, or is it you just have ongoing problems? Is it
23 that, you know, the 10 most made errors you try to
24 internalize them into your input people, and then you
25 get another 10 problems? Is that what's happening?

1 Are there corrections going on on your side, or you're
2 just simply just downloading and this is the result of
3 that?

4 **MR. BRADBURY:** Yes, sir. We don't ignore
5 errors, you know. If we -- we look at the errors that
6 we receive and we find that we have a training
7 problem, process problem, on our side, we're going to
8 fix that. Absolutely. And you'll see over --

9 **CHAIRMAN GARCIA:** All right. But -- and I
10 know computers make mistakes, but they don't screw up
11 one in every four as a typical thing. It's usually a
12 small percentage. What's going on here then is, I
13 guess, the question.

14 What is it that you need that -- I know you
15 want quicker return time when something is wrong, but
16 what exactly is it that's going on wrong?

17 **MR. BRADBURY:** Again, two things as -- say,
18 an EDI user or a TAG user in the future needs good
19 documentation of the business rules so that they can
20 do their front-end edit work to avoid errors.

21 A LENS or a EDI-PC user needs BellSouth to
22 have provided in those interfaces the same level of
23 edits that are available to the BellSouth service rep.
24 That's the need.

25 **CHAIRMAN GARCIA:** I'm sorry. I just don't

1 understand. I don't --

2 **MR. BRADBURY:** I'm sorry I'm not --

3 **COMMISSIONER JACOBS:** The point that I
4 think -- what I heard you say earlier is that the
5 business rules are essentially a moving landscape, or
6 at least not cast in stone.

7 **MR. BRADBURY:** They are not cast in stone.
8 They, you know --

9 **CHAIRMAN GARCIA:** So every morning you get
10 up and BellSouth has a different set of rules?

11 **MR. BRADBURY:** It's not that bad. Don't --

12 **CHAIRMAN GARCIA:** All right. But every --

13 **MR. BRADBURY:** -- want to imply that.

14 **CHAIRMAN GARCIA:** I mean --

15 **MR. BRADBURY:** Don't want to imply that.

16 **CHAIRMAN GARCIA:** -- obviously you were down
17 19% and we ended up at 31%. Three months of
18 experience should have made it better, not worse,
19 so --

20 **MR. BRADBURY:** No. This -- that percentage
21 is where BellSouth is intervening in telling us.

22 **CHAIRMAN GARCIA:** Either one. I mean, go up
23 to the top. You --

24 **MR. BRADBURY:** That's the interval it takes
25 them to tell us. Let me find the --

1 **CHAIRMAN GARCIA:** Okay. So explain to me
2 what exactly is the problem. Because clearly your
3 interest is to get as many orders through without a
4 problem --

5 **MR. BRADBURY:** Correct.

6 **CHAIRMAN GARCIA:** Especially because it
7 takes you so long to get it back; so you want to get
8 it right on the front end.

9 Now, you said that BellSouth gave you a memo
10 listing the top 10 problems. But what exactly is it
11 that you do with that information? You retrain your
12 people and what happens is that then BellSouth changes
13 the rules on the front end so then you end up at the
14 same place?

15 **MR. BRADBURY:** No. I wouldn't want to couch
16 it that way.

17 **CHAIRMAN GARCIA:** No. But you're just
18 giving us a problem, and I just want to understand --

19 **MR. BRADBURY:** Okay. We need to -- the
20 problem has several parts to it. Depending on which
21 interface you're using, the problem was different.
22 For AT&T, the problem is an ongoing documentation of
23 business rules. And we have an ongoing dialogue with
24 BellSouth about when we find that they've told us one
25 thing and we do it and it doesn't work. We do that.

1 We also take the errors that come back to us
2 when we have violated the rule, our error. We retrain
3 our people about those violations, absolutely, because
4 we want as few errors as possible.

5 **CHAIRMAN GARCIA:** Correct.

6 **COMMISSIONER JACOBS:** Is it the case that
7 the original statement of business rules was correct
8 and it wasn't interpreted properly in the system, or
9 is it the case that the original statement was
10 incorrect and the system is doing it correctly? Which
11 do you find most prominent?

12 **MR. BRADBURY:** Early on we found the second
13 one. The business rules that we provided were
14 incorrect. Okay.

15 What we're finding now is as changes to
16 those business rules come out, a certain number of
17 those are also incorrect, and so if that new business
18 rule has come out and we've built to it and, in fact,
19 BellSouth implemented it differently, then our initial
20 orders for that business rule will fall out.

21 We'll call them up and say, what did we do
22 wrong or what did you do wrong; and we'll figure out
23 which one is right. So it's an ongoing thing.

24 **UNIDENTIFIED SPEAKER:** (Inaudible comment
25 away from microphone.)

1 **COMMISSIONER JOHNSON:** You need to turn your
2 mike on.

3 **UNIDENTIFIED SPEAKER:** (Further comment away
4 from microphone.)

5 **MR. BRADBURY:** As Sharon said, a third
6 impact there is the lack -- or has been the lack of
7 integration between preordering and ordering where you
8 have to rekey a lot of stuff, and so you get those
9 kinds of errors, which aren't business rule errors.
10 Those are just human types of errors.

11 If you have preordering and ordering
12 integration and you don't have to inject on our end,
13 or any other CLEC's end, the human and translating
14 information or rekeying information, you reduce those
15 types of errors.

16 **COMMISSIONER JACOBS:** And you --

17 **MR. BRADBURY:** And that's -- TAG should go a
18 long way to reducing that type of an error.

19 **COMMISSIONER JACOBS:** And the way it does
20 that, it makes that a machine-to-machine interface
21 between preordering and ordering?

22 **MR. BRADBURY:** Correct.

23 **COMMISSIONER JACOBS:** You don't do that now?

24 **MR. BRADBURY:** We do that now. I'm not sure
25 of the extent, you know.

1 **COMMISSIONER JACOBS:** In the other CLECs.

2 **MR. BRADBURY:** In the others.

3 **COMMISSIONER JOHNSON:** EDI mainframe allows
4 that?

5 **MR. BRADBURY:** Correct.

6 **COMMISSIONER JOHNSON:** I need Page 24. It
7 didn't come in my packet. But looking at Page 24
8 there, the first section is just how long it takes
9 before you receive a reject notice?

10 **MR. BRADBURY:** That's correct.

11 **COMMISSIONER JOHNSON:** And you think that
12 January was an anomaly as it relates it UNES?

13 **MR. BRADBURY:** It would certainly look like
14 it, but I would say that December was probably an
15 anomaly, too.

16 **COMMISSIONER JOHNSON:** Yeah. I was going to
17 ask you, because I thought you had raised that --

18 **MR. BRADBURY:** Average the two. I don't
19 know.

20 **COMMISSIONER JOHNSON:** And on the bottom
21 there, help me understand what this represents.
22 Percentage --

23 **MR. BRADBURY:** This is the percentage of
24 errors that occur on the electronically submitted
25 order where BellSouth has to intervene in rejecting

1 that order and send us back the intervention -- the
2 mechanized orders there -- mechanized -- two
3 components of mechanized reject.

4 If I send an order that has a fatal error in
5 it, that comes back to be mechanized. If I send an
6 order over that has what BellSouth calls an
7 autoclarification error, that comes back mechanized.

8 The bottom one is if I send an order over
9 that was good enough not to be fatal, good enough not
10 to encounter an autocorrection so it's gone through
11 LEO and into LESOG but had something wrong with it
12 that LESOG or SOCS found, BellSouth has to intervene
13 in that order.

14 **CHAIRMAN GARCIA:** Is that intervention back
15 to you, or they intervene and just keep it going on
16 the system?

17 **MR. BRADBURY:** This is back to me.

18 **CHAIRMAN GARCIA:** Even though it wasn't a
19 fatal --

20 **MR. BRADBURY:** It wasn't a fatal. It wasn't
21 automatically identified to be returned to me. It had
22 to be sent to a BellSouth person to determine that it
23 wasn't -- to determine that it was my error.

24 **CHAIRMAN GARCIA:** So what you're -- let's
25 look at March, then; okay. So you're telling -- that

1 31% of ALEC your orders were returned because --

2 MR. BRADBURY: Again, that --

3 CHAIRMAN GARCIA: -- there wasn't a fatal
4 flaw? Or is that cumulative of all your flaws?

5 Because you just said this went through LEO, LESOG, or
6 SOCS or whatever, and then at the back end someone
7 catches it and has to send it. 31% of them that
8 happened.

9 MR. BRADBURY: That's correct.

10 CHAIRMAN GARCIA: Okay. And we saw some
11 demonstrations where before they ever got there,
12 something around 10, 15% were being stopped on the
13 front end before it ever got to the manual side.

14 MR. BRADBURY: Right.

15 CHAIRMAN GARCIA: So 15% percent of --

16 MR. BRADBURY: That's the mechanized line-up
17 there.

18 CHAIRMAN GARCIA: Okay. So that's a total,
19 then.

20 MR. BRADBURY: Okay. The total in March
21 would have been 19,000--some CLEC errors spread between
22 fatals, all those, and CLEC errors found after
23 BellSouth intervened --

24 CHAIRMAN GARCIA: So that's a total number.

25 MR. BRADBURY: Yeah. Okay. So that's the

1 interval, how long it take them to tell us we made an
2 error and how many that they had to intervene in to be
3 able to tell us that.

4 Going on to the next page, Sharon.

5 There are other impacts of BellSouth's
6 manual intervention of the ordering process besides
7 their intervention in the rejection process.

8 BellSouth manually rekeys a relatively high
9 percentage of the EDI and LENS orders that we send
10 over in the SOCS; actually, DOE here in the Florida
11 region.

12 For example, in March there were some almost
13 20,000 orders that were valid orders the CLECs
14 submitted, but BellSouth had to intervene into the --
15 put them back into the DOE machine. It is composed of
16 the M orders that Mr. Stacy talked about yesterday,
17 orders that we send over electronically but they
18 process manually, or orders that we send over
19 electronically they encounter some sort an of error in
20 BellSouth's process and they drop out for manual
21 treatment. So there were -- to get those 20,000
22 orders processed, BellSouth had to intervene into that
23 process.

24 Now, I can't look into BellSouth's SOCS
25 machine and see my order that's pending. Okay. So

1 BellSouth has taken these 20,000 orders and retyped
2 them. There is some probability that they made an
3 error when they did that, but I can't see that because
4 I can't look into my pending order in SOCS.

5 So the first time I know that BellSouth made
6 an error on these 20,000 -- or the CLEC industry --
7 again, this is all CLEC data -- knows about that is
8 when my customer tells me, hey, I didn't get what you
9 said I was going to get. And so that's a customer
10 "non-satisfier".

11 **COMMISSIONER DEASON:** Why does BellSouth
12 find it necessary to do this rekeying?

13 **MR. BRADBURY:** Again, there are two
14 things -- two causes of that; those types of orders
15 that I'm allowed to send electronically, but they do
16 not allow to flow through; okay, and then those
17 orders --

18 **COMMISSIONER DEASON:** Okay. Now, why don't
19 they allow it to flow through? There is an error?

20 **MR. BRADBURY:** No, there's no error on this
21 order. It's just they've not provided a process that
22 allows that order to flow through without human
23 intervention.

24 **COMMISSIONER DEASON:** And they process it
25 the same way for themselves internally, similar

1 orders?

2 **MR. BRADBURY:** Internally, my contention is
3 that they have submitted -- they would submit that
4 same order themselves and it would flow through to
5 SOCS without human intervention.

6 **COMMISSIONER JACOBS:** You listed those back
7 here somewhere, right?

8 **COMMISSIONER CLARK:** What types of orders
9 are they?

10 **MR. BRADBURY:** These are the M orders that
11 Mr. Stacy talked about yesterday. And the definition
12 of M orders when it first came out -- and Mr. Stacy
13 started talking about this -- last year at the FCC was
14 complex orders only and for EDI only.

15 That definition has recently been expanded
16 to include 12 different categories of orders that
17 crosses both the EDI ordering interface and the LENS
18 ordering interface. I haven't memorized that list,
19 but I can -- I could get it and read it to you, but
20 I -- you know, things like an account that's in
21 denial. It's an account where BellSouth has denied
22 service to the customer but the CLEC is going to pick
23 it up. That account falls out. That's a new
24 expansion of the definition in recent weeks.

25 **COMMISSIONER JACOBS:** And also that no UNE

1 order can go through without human intervention?

2 **MR. BRADBURY:** It is my belief that no UNE
3 orders currently flow through BellSouth's system.

4 **COMMISSIONER JACOBS:** What's the main
5 purpose, or what's the main point at which
6 intervention is required?

7 **MR. BRADBURY:** The main point?

8 **COMMISSIONER JACOBS:** Where in the process
9 is the most common place where human --

10 **MR. BRADBURY:** I really don't have that
11 information. The data that we get from -- that's
12 available from BellSouth in public forums, I can't
13 tell.

14 **COMMISSIONER DEASON:** So what are you
15 asking? You want either BellSouth to do it
16 electronically, or do you want the ability to review
17 what they've done manually?

18 **MR. BRADBURY:** I need both. Okay. To the
19 extent that BellSouth must rekey an order, if there
20 are valid conditions under which BellSouth must
21 intervene in my order to put it in, I need the
22 capability when they've done that then to look into
23 SOCS and see if they put it in correctly.

24 If there's no valid reason for them to have
25 intervened in that order at all, I need them to

1 provide the process that allows that order to flow
2 through.

3 Okay. Flow-through: Now, successful
4 flow-through of an electronically submitted order is
5 truly a win/win/win situation for BellSouth, for the
6 CLEC community, and for the customer. It reduces
7 BellSouth's and the CLECs' expenses for people, for
8 programing, everything else. It reduces the errors
9 that occur on orders, and it provides more timely
10 services to the customers. So successful flow-through
11 is absolutely in everybody's best interest.

12 Flow-through is being measured today. What
13 it's designed -- should be designed to measure is what
14 did not flow through the system for reasons that
15 BellSouth caused.

16 There's a definition in two orders here in
17 the south, in Georgia and Louisiana, that accomplishes
18 that objective. Those two definitions also comport
19 with the FCC's definition of flow-through in its
20 notice of proposed rulemaking last April, but
21 BellSouth currently doesn't measure in conformance
22 with those definitions.

23 All right.

24 **COMMISSIONER DEASON:** Did you hear Mr. Stacy
25 say that he thinks he's gotten the FCC to agree with

1 his calculation?

2 **MR. BRADBURY:** Yes, sir. And I have --
3 again, strangely enough, I have a different opinion of
4 what the FCC has done there.

5 They have not agreed with what Mr. Stacy is
6 doing. They have said if BellSouth follows certain
7 steps, that -- and can prove certain things, their
8 process might be acceptable. BellSouth has yet to do
9 those things, to do that.

10 So it's not -- the FCC hasn't agreed.
11 They've -- and, again, it's a common carrier really
12 that's issued this letter. It's a very good letter.
13 We'll talk about it later. But it's not an agreement
14 with BellSouth.

15 It's a view that if BellSouth does certain
16 things, that that would be satisfactory. BellSouth
17 hasn't done those yet. But this is the definition
18 that exists in the Georgia order. The Louisiana order
19 is similar to it. And here what we're talking about
20 is that percent flow-through service requests measures
21 the percentage submitted electronically that utilized
22 BellSouth's OSS without manual human intervention.

23 Then there's a calculation, total number of
24 valid service requests that flow through to BellSouth
25 divided by the total number of valid service requests

1 delivered to the BellSouth OSS.

2 The one exclusion is rejected service
3 requests. A true CLEC error is excluded from this
4 process.

5 Now, the next four slides I'm going to skip
6 over. Okay. They are an example of how BellSouth
7 calculates this -- how it should be calculated and how
8 BellSouth is calculating it using, you know, the old
9 100 minus 10 minus 10. I'm going to do the same thing
10 with some real data in some other slides, so these are
11 simply here for referral later. It's a little easier
12 process in working with the real data.

13 What are we talking about? We're talking
14 about how many of what went where, when, and why did
15 they go there. You know, in order to evaluate
16 flow-through or, for that manner -- matter, any other
17 measurement process -- measurement of a process,
18 you've got to be able to count and account for all of
19 the things that go into the process and all of the
20 things that go out of the process.

21 So here's a funnel -- and I'm going to ask
22 you to write, if you've got a pen or pencil with you.
23 I wasn't as clever as Mr. Stacy and able to do this in
24 advance.

25 At the top there we see the universe of CLEC

1 LSRs coming in. They can come in for resale, for UNE,
2 for interconnection. They could be for business or
3 residence. They could be for many types of
4 activities, and they could come in over a number of
5 interfaces.

6 If you put a number, say, in the upper left
7 of that -- those of you who have got the big ones can
8 probably do this -- 198,537. We're going to do a
9 little math exercise. That's the number of CLEC LSRs
10 submitted to BellSouth in March, both manually and
11 electronically. Okay.

12 The next thing to do is put right in here
13 the number 108,467. That's the number of those orders
14 that came in up here, that came into BellSouth as
15 manual requests. They received those either as fax or
16 a box of mail or whatever.

17 **CHAIRMAN GARCIA:** Repeat -- which one of
18 those?

19 **MR. BRADBURY:** The 108,467 arrived manually;
20 fax, mail. So that's 55% of all the local service
21 requests that BellSouth received. And, again, this is
22 February data. Did I say March earlier? I thought I
23 did. That's February data.

24 So the center core of this funnel is all
25 manual. That's the last we know in terms of volumes

1 about manual order processing in BellSouth. In fact,
2 BellSouth does not even report that number on any
3 regular basis in any jurisdiction.

4 Now, we see percentages throughout the rest
5 of the performance reports about what percentage of
6 manual orders received rejections and so forth, but we
7 have no volume data to go with it, and in most months
8 we have no volume data at all. It's just through
9 another source that this number for February became
10 available to us.

11 If you've got room down this side here, the
12 first number to put there is 90,070. That's the
13 number of electronically submitted LSRs that were
14 received in February. Obviously that's 45% of the
15 grand total.

16 Now, below that we can put in two more
17 numbers. And I'll tell you the first number will be
18 the number of EDI LSRs, which is 25,189; and that was
19 28% of the electronic orders. That's 28% of the
20 90,000.

21 The next number down would be the LENS
22 orders; 64,881, and that's 72% of the electronic
23 orders that were received in February. Okay. So we
24 know what came in now.

25 The objective of flow-through reporting

1 would be applied to what you wrote over here, the
2 electronic orders, and you would try to then determine
3 how many of those -- ultimately what you want to know,
4 how many of those resulted in a service order over
5 here. That's the objective is to get as many of those
6 to be service orders as you possibly can.

7 Many different things are going to happen to
8 them, as you go through that process. Several of them
9 will drop out for manual processing as an M order
10 Mr. Stacy talked about yesterday. Several of them
11 will drop out even before that and come in over here.
12 (Indicating) Several of them will drop out for being
13 fatal errors; drop out for having -- being an
14 autoclarified error.

15 Others will have gotten through LEO and into
16 LESOG and will either drop out as a CLEC error, which
17 is returned to the CLEC to correct, or a BellSouth
18 error, which they correct. So for BellSouth errors,
19 they correct and put them back into the system. They
20 also put back into the system the M orders. Okay.

21 Again, the objective in any performance
22 measurement, you should be able to continue down
23 through the process and determine what happened to
24 every one of those orders. We're not going to do that
25 math, though.

1 Sharon, can we go on to the next chart.

2 **COMMISSIONER JOHNSON:** But for the manual,
3 the 108,000 for March, you're saying that there is --

4 **MR. BRADBURY:** That's for February. I'm
5 sorry.

6 **COMMISSIONER JOHNSON:** Oh. This is
7 February?

8 **MR. BRADBURY:** Yes, February.

9 **COMMISSIONER JOHNSON:** There is no --

10 **MR. BRADBURY:** There's no other volume data
11 about that.

12 **COMMISSIONER JOHNSON:** There's no other
13 what?

14 **MR. BRADBURY:** No other volume -- I can't
15 tell you what happened. In other words, I don't know
16 how many of those became issued service orders, how
17 many of those were returned to CLECs as errors. I
18 don't know how many. I know some percentages of
19 things, but BellSouth never on a regular basis
20 produces that number anywhere.

21 **COMMISSIONER JOHNSON:** And they've been
22 required to do that --

23 **MR. BRADBURY:** No.

24 **COMMISSIONER JOHNSON:** -- by the FCC, any --

25 **MR. BRADBURY:** No. They haven't -- there's

1 no requirement that I'm aware of for them to do that.
2 However, not doing it glosses over the tremendous
3 amount of manual effort BellSouth must perform,
4 because not all of those -- we'll see another chart
5 later -- not all of those things are manual because of
6 the CLEC's choice to do manual.

7 **COMMISSIONER JOHNSON:** Well, wait a minute
8 then. Of the manual requests, you said the 108,000,
9 that they were actually the faxes, the mail, they came
10 in as manual requests.

11 **MR. BRADBURY:** Correct.

12 **COMMISSIONER JOHNSON:** In those there's no
13 flow-through accountability information. But of the
14 90,000 electronic submissions, some of which became
15 M class or whatever you --

16 **MR. BRADBURY:** Right.

17 **COMMISSIONER JOHNSON:** -- now those, there
18 would be the information for what happened in a
19 flow-through process, wouldn't there?

20 **MR. BRADBURY:** Actually, we know how many of
21 them there were, but we don't know how many of them
22 subsequently turned into orders.

23 BellSouth -- it falls out, BellSouth
24 manually processes it. But I actually do not now how
25 many of those subsequently turn into orders. That's a

1 missing "goes-out-of" in this process.

2 Likewise -- Sharon, just go back to the
3 slide.

4 So I really don't know how many of those
5 turn into orders from the data that's being presented
6 now. (Indicating)

7 **CHAIRMAN GARCIA:** How much longer do you
8 have?

9 **MR. BRADBURY:** Probably a half hour.

10 **CHAIRMAN GARCIA:** All right. Let's take a
11 break right here and we'll reconvene in 20 minutes.

12 (Brief recess.)

13

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14 **CHAIRMAN GARCIA:** We're going to get back
15 started. I'm going to ask that those who are set to
16 speak after AT&T -- we're going to take a lunch after
17 this presentation is over. If you could look at your
18 presentation. There's been substantial questions
19 asked. I think it's been brutally exhaustive, the
20 information we've gotten. So if you have a
21 presentation, try to cut it down because according to
22 our schedule we'll be here till 6:30, and I just don't
23 think that we're going to get to where we need to get
24 to if we last that long, at least in terms of learning
25 what is going on.

1 So if you could, please, limit it. Let's
2 not cover the same territory that's been covered here
3 with our questions, and that'll put us back on
4 schedule. And also, I leave the hearing in the
5 capable hands of Commissioner Deason.

6 **COMMISSIONER DEASON:** Okay. We shall
7 proceed.

8 **MR. BRADBURY:** All right. Thank you, sir.
9 You all hear me in the back okay? Sharon, we'll go on
10 to the next slide.

11 In the Louisiana II order the FCC did find
12 certain deficiencies with BellSouth's flow-through
13 reporting. Three of the four still exist today.
14 BellSouth does now disaggregate its data by EDI and
15 LENS and TAG. However, we are still -- there still is
16 as dispute about the treatment of "M" orders, a
17 dispute about the treatment of error allocation, and
18 UNE data is still aggregated.

19 Sharon.

20 This is the impact of the exclusion of "M"
21 orders. These are valid CLEC orders. There is
22 nothing wrong with them when they're submitted.
23 Nothing really has changed since the LA II order. The
24 exclusion over states flow through so it makes it
25 appear that the win/win/win situation for BellSouth,

1 the CLECs and our customers is greater than it really
2 is.

3 You can see over time that the numbers of
4 these orders has been increasing and has been
5 increasing relative to the total orders. The
6 percentages have been increasing.

7 Sharon.

8 On the error allocation dispute, these are
9 those -- yeah -- "E"s that came out and BellSouth has
10 to manually intervene to determine whether it's a
11 BellSouth program that caused the error or a CLEC
12 input error.

13 There was a change in methodology that
14 occurred in November. Prior to November, the
15 September and October data is fairly representative.
16 CLECs were being allocated 60% to 75% of those E-type
17 errors. With the change in reporting methodology that
18 occurred in November, you can see that that has
19 changed. The first month it was 11%. The consistent
20 number seems to be something in the mid 30's these
21 days. Big, big change.

22 The other thing that is interesting in the
23 data here is the increase in the number of BellSouth
24 errors that has occurred in the last two months.
25 10,000, almost 11,000. 9,500.

1 Okay. What does this mean at the reporting
2 level? There is a number that I refer to as a basic
3 flow-through number. This is how you measure the
4 win/win/win. This is where you can determine how
5 efficient this process is being for BellSouth, for the
6 CLECs and for our customers.

7 Okay. It's the number of service orders
8 that are issued, divided by the number of local
9 service requests that came in electronically. It
10 doesn't assign blame for why that happened or why
11 there's a difference between the two. It just says,
12 "Hey, in March only 61% of the LSRs that came in the
13 front door resulted in an issued service order."

14 BellSouth applies "M" order exclusion and
15 CLEC error exclusion and reports for that same month
16 in March the number 85.2%. It's my belief that if
17 they reported it in conformance to the orders guiding
18 them, that it would be 73.5%.

19 BellSouth's performance for RNS, the
20 residential orders, in March was 96.5%. For business
21 flow-through was 83.2%. On waited average, and I used
22 a 90/10, based on BellSouth's testimony in the past
23 that that's about the relationship of orders between
24 the two systems, their overall flow-through of their
25 orders is in the 95% range.

1 Up at top, regardless of which one you pick,
2 my basic flow-through, what their reporting and what I
3 think they should be reporting, you can see in 1999 a
4 definite downward trend in all three. It doesn't
5 matter which one you pick to look at right now, CLEC
6 flow-through is going down this year. Not up. Not
7 improving.

8 **COMMISSIONER JOHNSON:** What do you think the
9 cause of that might be?

10 **MR. BRADBURY:** Well, jump back one slide.

11 One of them is the increased number of
12 BellSouth programming errors. We've gone here in
13 February and March up to, you know, 11,000, 10,000,
14 BellSouth calls, errors. Used to be as low, back in
15 September, as 2,000. Again, the allocation process
16 that's been used here in the past is questionable, so
17 the past allocation and even the present allocation is
18 subject to question, but that would be a cause.

19 **COMMISSIONER JOHNSON:** What would be the
20 types of errors that BellSouth may be making?

21 **MR. BRADBURY:** I can't tell you. They don't
22 tell us.

23 **COMMISSIONER JOHNSON:** Oh, they just report
24 that there were errors on their part?

25 **MR. BRADBURY:** Yes, ma'am.

1 **COMMISSIONER DEASON:** Is this an increase in
2 the number of errors or just that they're being
3 reported more correctly?

4 **MR. BRADBURY:** Again, I really can't answer
5 that question because of the problems that have
6 existed in BellSouth's error allocation. If I take
7 their reporting at face value, it's an increase in
8 errors on their part.

9 Okay. Let's go forward and let's take a
10 different view, forgetting formulas. This is what I
11 like to call the whole experience. And again, now I'm
12 working with March data. Before I was working with
13 February data when I had you writing in numbers. Now
14 I've got some numbers you don't have to write.

15 We've taken that one data point we were
16 given about March and made an assumption -- about
17 February and made an assumption that, you know, that
18 same relationship about 54%, 55% would hold in March,
19 so, we grossed up here. And so we see that there were
20 some 200,000 orders that came in the front door at
21 BellSouth from the CLECs. About 110,000 of them
22 dropped out for -- didn't drop out, came in the door
23 manually. These came in, you know, on the hand cart
24 or in the mail or over the fax.

25 Some of those came that way simply because

1 the CLEC has made a business decision to do that.
2 Okay. No fault on BellSouth's part. Some of those,
3 though, came in the door because there's no other way
4 to get that order to BellSouth. You know, you can't
5 submit it electronically so you have to send it
6 manually. We do not know what the relationship
7 between those two is.

8 Next, we see dealing in electronic orders,
9 that there were 4,500 rejects, fatal rejects. I would
10 like to point out that 4,200 of those were made by one
11 company.

12 Next, we see that there were 10,251
13 electronic orders submitted, fell out from manual
14 processing because of BellSouth's decisions not to
15 provide flow-through for those orders.

16 Next, we see that CLECs made errors that
17 resulted in auto clarification, almost 9,000 times.
18 86 -- 8,700 times. So, here CLECs possibly have
19 inadequate front-end or they're using an interface
20 that BellSouth is providing that has an inadequate
21 front-end editor.

22 I'd like to point out here that of those --
23 that's what? 8,700? There is one company responsible
24 for 3,000 of them.

25 **COMMISSIONER JOHNSON:** Of which ones? I'm

1 sorry.

2 **MR. BRADBURY:** Of the auto clarifies. One
3 company is responsible for 3,000. It happens to be
4 the same company that was responsible for the 4,200
5 fatal rejects.

6 **COMMISSIONER JOHNSON:** Which company was
7 that?

8 **MR. BRADBURY:** I don't know. Let's just
9 call it company 128-B.

10 **COMMISSIONER JOHNSON:** Do you have
11 anything -- was there a unique problem or something?

12 **MR. BRADBURY:** I don't know because I don't
13 know who the company is.

14 **COMMISSIONER JOHNSON:** Oh, I got you.

15 **MR. BRADBURY:** All I can tell you is they're
16 submitting orders via EDI and since the volume and so
17 forth, and I know the EDI main frame players, it's
18 EDI-PC that they're using to submit them.

19 **COMMISSIONER JOHNSON:** Okay.

20 **MR. BRADBURY:** Next, we see that BellSouth
21 made 9,500 errors in processing these. These are
22 BellSouth bugs in their programming. And that there
23 were 6,200 CLEC errors. Now, we've -- you know,
24 we've -- this is where we've gotten to the point where
25 they have to divide the two. We've gone through LEO

1 and we're in LESOG and there were 6,200 of those.

2 And again, I'd like to point out that there
3 was one company that was responsible for 5,800 of
4 them. And guess what? It's that same company that
5 was responsible for the 3,000 auto clarifies and the
6 4,000 fatal rejects.

7 So we have one company who, in the month of
8 March, skewed the data completely out of -- that one
9 company had 13,000 errors out of the 19,400 CLEC
10 errors that were made in that month. So, just a fact
11 of point.

12 Okay. But like I said, that's the big
13 picture. 200,000 in, 55,000 out electronically.
14 Don't know how many out manually. The data is not
15 available.

16 Okay. Like to skip over the next two
17 slides.

18 **COMMISSIONER DEASON:** Let me ask you a
19 question, and to an extent, I guess, it's kind of
20 facetious. It seems to me we've got too many errors.
21 Those are errors being made on both sides. Should we
22 have some type of an incentive plan that for every
23 error you make, you pay BellSouth so much; for every
24 error they make, they pay you, so that everybody has
25 got a good incentive to not make errors?

1 **MR. BRADBURY:** I'd really like not to answer
2 that question.

3 **COMMISSIONER DEASON:** Well, I mean, how do
4 we solve the problem? I mean, we're caught in the
5 middle as regulators. You're sitting over there
6 saying, "We got all these errors. Things aren't
7 working right." BellSouth is saying, "Things work
8 really well and we're doing well, but we make as many
9 errors for ourselves as we make for them." And we sit
10 here and we try to determine where the truth is, and
11 we really don't have the tools to know ourselves. And
12 maybe we need a mechanism out there to try to minimize
13 the errors and usually what gets people attention more
14 than anything else is when you start talking about
15 dollars.

16 Have you thought about it as a policy
17 question as to how do we go about minimizing the
18 errors, because no one wins when there is errors. And
19 not only does customers get unhappy, but it cost the
20 system more money, too, to reprocess all of these
21 things.

22 **MR. BRADBURY:** No, I have not thought about
23 it as a policy matter. I think about error correct as
24 an operational and a cost product -- cost of doing
25 business all the time. That's why I wanted to point

1 out, in this particular month, there is one company
2 who's responsible for --

3 **COMMISSIONER DEASON:** Well, maybe somebody
4 needs to get their attention.

5 **MR. BRADBURY:** It's not my company. You
6 know --

7 **COMMISSIONER DEASON:** Maybe somebody needs
8 to get their attention some way. Maybe they are --
9 they're imposing unreasonable burdens and cost on the
10 system which is not -- which is not helping anyone,
11 and I don't know who they are either.

12 **MR. BRADBURY:** I don't know they're identity
13 either.

14 **COMMISSIONER CLARK:** Well, let me ask the
15 question.

16 **MR. BRADBURY:** Again, this is CLEC aggregate
17 nine state data. Please understand that.

18 **COMMISSIONER CLARK:** It seems to me one of
19 the things -- I don't disagree that you might want to
20 do something like that, but one of the things to get
21 right is that the performance standards that BellSouth
22 or whoever needs to be held to, should only be those
23 over which they have control. The fact that bad data
24 was put in by the CLEC should not impact their
25 performance standards at all.

1 **MR. BRADBURY:** And the calculation, as in
2 the Georgia and Louisiana orders and proposed by the
3 FCC, if a CLEC is, indeed, making errors that are CLEC
4 caused errors, those do not penalize BellSouth's
5 performance. The formula works that way. Okay.
6 BellSouth is not penalized for a true CLEC -- the only
7 dispute here --

8 **COMMISSIONER CLARK:** Is what is a true CLEC.

9 **MR. BRADBURY:** And it's not -- this is not a
10 dispute at the fatal reject level or at the auto
11 clarify level. It's at the "E" level where that error
12 could have been either BellSouth's or the CLEC's.
13 That's where the dispute on those errors is.

14 So on that pipe, there were 9,500 BellSouth
15 errors and 6,200 CLEC errors, per BellSouth's
16 allocation of those errors. Don't know if that
17 allocation is right or wrong. We have questions based
18 on prior data that it may not be correct. It's never
19 been audited.

20 All right. Like to skip over the next two
21 and go to one more chart that talks about
22 flow-through.

23 **MS. NORRIS:** Jay, could I just add one
24 thing? This is Sharon Norris. I work with Jay on OSS
25 issues for AT&T. And in response to the question,

1 what can we as regulators do, there really -- and
2 everything that's been said by you is absolutely
3 accurate.

4 My position or my thoughts about -- in
5 responding to your question, is as a regulator you can
6 ensure hopefully through some methods that all the
7 things that the CLECs need to minimize errors on the
8 front end are done; that integration is available;
9 that business rules are adequate; that the change
10 control process or changes in business rules is
11 managed well. And if you don't have the tools to do
12 that -- as you said, you may not have those -- some
13 other states have undertaken having an independent
14 third party to go in and take the business rules and
15 documents and systems of an RBOC back and see if they
16 can use them. And it sort of eliminates this he
17 said/she said stuff that kind of gets you in the
18 middle. So that's one alternative that you have.

19 And then, absent that, then you're right.
20 Then it gets to auditing the performance measures and
21 saying, "Let's have somebody look at this, all of this
22 allocation process, and see if it's an equitable one."

23 Those are two things that I would offer as
24 regulators that you have as tools at your disposal to
25 resolve this problem.

1 **MR. BRADBURY:** 41. Okay. It was postulated
2 yesterday that BellSouth has no flow-through for its
3 business orders. I'm a picture oriented person. This
4 picture is my explanation of yes, they do, and that
5 Mr. Stacy and BellSouth have been accurately reporting
6 it for the last 18 months.

7 On the BellSouth side here we see a service
8 representative who could be inputting those into DOE
9 and SONGS or RNS. I saved myself one block. Only one
10 service rep. But in both cases they are inputting
11 into a system that applies edits to an order and then
12 sends the order to SOCS, which also applies edits,
13 which turns the order -- service request into a
14 service order.

15 Similarly on the CLEC side, I have a service
16 representative typing into my system, sends it across
17 to BellSouth where it also receives some more edits,
18 goes to SOCS where it's edited finally, resulting in a
19 service order. There is no difference in my mind.

20 BellSouth has been accurately reporting its
21 business flow-through for the past 18 months, and that
22 their argument that they don't have flow-through for
23 business is bogus. And that closes my section on
24 flow-through.

25 Like to talk very briefly about provisioning

1 and the FCC said a couple of things about
2 provisioning.

3 Sharon, we can go on to the next slide.

4 There are two measurements that they talked
5 about, relationships to intervals. They wanted to
6 look at the long interval, which is from the receipt
7 of when they got a valid order until the CLEC received
8 a completion notice. And then they had, within that
9 interval, from the receipt of a valid order until the
10 service was actually provided.

11 It's very difficult to calculate these
12 intervals from the data BellSouth is providing. For
13 the long run, BellSouth has not been providing
14 reliable data on completion notice intervals, and I
15 will show you why I say that in a minute.

16 The way the data is presented is
17 disaggregated differently for FOC and installation
18 internals so it's hard to add those together to get
19 that one. And BellSouth, just like they provided no
20 comparison -- (telephonic interference) -- rejects --
21 are we still alive -- for rejects, also provides no
22 comparative data for FOCs, claiming they have no
23 similar process.

24 Sharon, the next slide.

25 This is the completion notice interval data

1 that has been provided. (Telephonic interference.)

2 **UNIDENTIFIED SPEAKER:** The thing needs to be
3 taken off the --

4 **MR. BRADBURY:** Where do I --

5 **UNIDENTIFIED SPEAKER:** Saturn mission was
6 successful. (Laughter.)

7 **MR. BRADBURY:** Okay. Are we back on? All
8 right. This is the data that's been provided recently
9 regarding completion notice intervals. In November
10 BellSouth sent out a blank table. In December there
11 was a percent distribution but no intervals. January
12 we saw some intervals for residence in business. We
13 see them again in February. Picked up a UNE design
14 interval. And we see intervals for residence,
15 business, resale of UNE and design.

16 I really don't think it's taking BellSouth
17 29 days to provide us with completion notices in the
18 CLEC world. I think their data here is still
19 unreliable.

20 Firm order confirmation. We talked about
21 this and you've been following along and you really
22 know that firm order confirmation belongs back in
23 ordering. The reason it's here is because I was
24 trying to do what the FCC said to do with provisioning
25 intervals and added to it.

1 See some marked improvements recently in the
2 residential mechanized -- "M" stands for mechanized.
3 "NM" for nonmechanized -- January, February and March
4 intervals for that type of an order returning to us.

5 This is where I have submitted what is a
6 clean order and it gets FOCed mechanically. Looks
7 pretty good. I don't think I'd say the same about the
8 rest of them in the mechanized world. Business 30
9 hours, UNEs 71 hours, reading from the March. No data
10 for loops with LNP, which is a very common
11 transaction, which indicates to me that none of those
12 are flowing through.

13 And the other -- kind of a real interesting
14 change there between February and March. Like to see
15 more data to see what is going to happen with that
16 one.

17 **COMMISSIONER DEASON:** What period of time
18 are you measuring? From the time that you submit an
19 order which has no errors, goes through the system, it
20 takes this long to get an FOC or does this measure the
21 amount of time that it takes to correct the errors?

22 **MR. BRADBURY:** No. This is just a clean
23 order to FOC.

24 **COMMISSIONER DEASON:** Clean order?

25 **MR. BRADBURY:** Right.

1 **COMMISSIONER DEASON:** Okay.

2 **MR. BRADBURY:** Okay. Like to turn next to
3 maintenance and repair, and walk through some slides.
4 This is -- it's very important when you talk about
5 maintenance and repair to start from the CLEC's
6 perspective. It's the CLEC who's dealing with the
7 customer.

8 Okay. So we have a system at AT&T that's
9 set up and we can talk to our databases that contain
10 our customer service information, our problem
11 information, our trouble report information. If it's
12 a facility-based customer we'd have that kind of
13 information also.

14 These days, I can be talking to a customer
15 about his long distance, his wireless, his local, his
16 Internet, his video, so I've got about six different
17 things that I could be talking to my customer about,
18 so I have to have my own database. So my process is
19 set up to meet the needs of the CLEC, AT&T, first.
20 Assumes that I can go out and get what I need from
21 other providers.

22 Next slide is my current "standard"
23 maintenance process with BellSouth. It's a telephonic
24 process. We talked earlier, we had used the EBI
25 interface for a little bit. I make a phone call to

1 BellSouth's wholesale repair center where they have
2 access to the WFA system and the TAFI system and they
3 take my trouble report using the pre-agreed to script
4 that we have between us and that's how I'm doing
5 business with them today.

6 Next slide please, Sharon.

7 We looked at using TAFI back in 1997 and you
8 see what it did to my process then, is I had to split
9 my process if I was going to be using TAFI. If I had
10 a trouble report that I could use TAFI on, I'd use it.
11 But if I didn't, I'd go use a telephone. So I now had
12 two processes to accomplish the same thing. And I
13 now, since I'm doing data entry into TAFI, I now have
14 two data entries and I can make errors between the
15 two. So what I put into TAFI may not match what I put
16 into my internal database.

17 There was sufficient additional cost related
18 to this operation that the business unit said, "I
19 don't want to do this," because we were looking at
20 that point at EBI coming up. Within six months time
21 we'd have had a machine-to-machine capability. So we
22 tested it and evaluated it and then did not continue
23 to use it.

24 This is the electronic bonding to ECTA
25 interface that we did use. And very, very briefly,

1 because we left the resale market, we didn't have the
2 critical mass of customers to make this an efficient
3 operation.

4 I would like to point out that while we call
5 this a machine-to-machine operation, it's only
6 machine-to-machine right here. Everything falls out
7 to the BellSouth person, and Mr. Stacy said that
8 yesterday, for handling. We knew about this as early
9 as April of '96.

10 And Sharon, we can go on to the next slide.

11 And what we have been asking for since April
12 of '96 is a configuration that would look like this
13 where we would have a machine-to-machine capability
14 between ourselves and BellSouth that would allow us
15 the access to TAFI and WFA and only reach a person as
16 a final default. That request has been on the table
17 for three years.

18 All right. Sharon.

19 Last July, BellSouth submitted its third
20 application to the FCC. In conclusion, I'd like to
21 just present to you the overview of BellSouth -- of
22 the FCC and BellSouth's application.

23 Couple of key things. The FCC says here
24 they filed a second application for Louisiana without
25 fully addressing the problems we had identified in

1 previous applications. Particularly evident in
2 Operations Support Systems.

3 Again, BellSouth had a map before they came
4 back there the second time. Actually, this was their
5 third time because they did it in South Carolina
6 before. The argument that they don't know what the
7 FCC wants is a little hallow. Clearly reflected in
8 the FCC's order here.

9 The next three pages outline more of the
10 FCC's conclusions specifically about preorder. They
11 started out, again, restating their overall
12 conclusions about failures to provide
13 nondiscriminatory access. Also in the unbundled
14 network world, and highlighted preordering and
15 flow-through that we spent a lot of time talking
16 about.

17 Stated the evaluation standards. The same
18 ones that Bill talked about yesterday. Substantially
19 same time and manner; meaningful opportunity to
20 compete; and that their preference is for performance
21 measurement of actual commercial usage.

22 In terms of preordering, they were pretty
23 harsh about the lack of integration in preordering.

24 Next slide.

25 Ordering has spent considerable amount of

1 time on flow-through, as we have here today. They
2 were very, very concerned about manual processing.
3 And I think we talked today about how much manual
4 processing still exists within BellSouth's systems,
5 both for orders that are submitted manually and for
6 orders that are submitted electronically and require
7 subsequent manual handling.

8 Next slide.

9 Provisioning, and they talked about the
10 installation intervals that are unable to compute
11 easily.

12 Maintenance -- this is -- (telephonic
13 interference.)

14 Talked about the differences in the
15 functionality available between TAFI and the
16 electronic -- (telephonic interference) -- interface.

17 Had some comments on billing. Those two
18 comments probably -- I would say have probably been
19 pretty well addressed by BellSouth at this time. They
20 highlighted several other of the check list items that
21 were impacted by OSS.

22 What's remaining? Most of the issues that
23 the FCC addressed in LA II are still unaddressed today
24 in an efficient manner.

25 There is a very interesting letter that

1 Mr. Stacy referred to yesterday from the Chief of the
2 Common Carrier Bureau, February 10th. Talks about
3 five issues; flow-through, TAFI integration,
4 performance measurements, complex ordering and
5 third-party testing.

6 And third-party testing, again, they state
7 their preference for commercial usage, but where there
8 is none or it's inconclusive, he said/she said, some
9 form of testing is necessary to demonstrate that the
10 BOC's OSS is operationally ready.

11 Wasn't particularly enamored with internal
12 testing or carrier-to-carrier testing, but that a
13 third-party test would serve as a reasonable safe
14 harbor.

15 It's a very good letter. We'll make this
16 available to you if you don't have it already. And if
17 you have other questions, I'm through.

18 **COMMISSIONER JACOBS:** I'm sorry. That
19 letter is from the FCC Common Carrier in response to
20 what?

21 **MR. BRADBURY:** Actually BellSouth and the
22 FCC had a dialog in mid December and this documents
23 that dialog. It presents their viewpoints -- the
24 Common Carrier's viewpoints on these five issues. It
25 is not an approval of anything that BellSouth is

1 doing. It is a series of suggestions. There are
2 things here that BellSouth needs to do. As they say,
3 they can't make a conclusive determination until they
4 receive the next -- (telephonic interference) --
5 application.

6 **COMMISSIONER DEASON:** Okay. Thank you. Let
7 me ask, at this point, has MCI reviewed their
8 presentation to see whether it can be shortened any?
9 We're still before the noon hour. I would suggest we
10 go ahead with MCI. If we have to break during the
11 middle of it, fine, but perhaps we can go ahead and
12 conclude MCI and try to get back on schedule.

13 **MS. KEATING:** If I could just point out one
14 thing before we move on. I think we're getting the
15 phone situation worked out so that if people want to
16 call in for the rest of the session they shouldn't
17 have a problem.

18 I just want to remind people, though, not to
19 put the line on hold because we get the music that is
20 on your hold line, but to also put us on mute or to
21 make sure that your office is quiet.

22 **MR. GREEN:** Good morning everybody. Mr. and
23 Mrs. Commissioner. My name is Bryan Green and I am
24 with MCI and today I'm going to present to you a brief
25 overview. I'm not going to retread ground that was

1 already trenched today and/or yesterday.

2 But what I will go through is just real
3 briefly where MCI is with their development with
4 BellSouth. Talk to you a bit about some of the
5 results of an operational trial that MCI commenced in
6 the beginning of or late 1998, early 1999, as well as
7 talk about where the issues reside with the
8 development process going forward and some of the
9 things that the Commission may be able to do to help
10 expedite that to make sure that the operational
11 interfaces are up and operational to support market
12 entry.

13 With that, let me dive right into sort of
14 the objective of our development efforts with
15 BellSouth. Obviously, it's to get machine-to-machine
16 interfaces up and operational, such that MCI has the
17 means by which to submit orders effectively through
18 the BellSouth system such that we enhance the
19 efficiency of the MCI systems through mechanized
20 interfaces, as well as gives us the opportunity to
21 meaningfully compete.

22 The end goal of that is for our customers
23 that will be transitioning to MCI to experience the
24 same level of service that they're used to getting
25 from BellSouth themselves. At a minimum that same

1 level of service. And without the means of having
2 operationally efficient interfaces, we won't
3 successfully be able to meet that goal.

4 Before I go to the next slide, because I
5 don't have a slide prepared to share with you where
6 MCI is with the development of BellSouth, I'm going to
7 break this up into the five silos of OSS, which would
8 be preordering, ordering -- and I'm going to lump
9 provisioning in with ordering. We'll talk about
10 maintenance and we'll talk about where we are with
11 billing.

12 Billing is less of an issue for us right now
13 because of the number of customers we have operational
14 and the amount of information we've been able to
15 derive, but that will probably be the next horizon
16 where their issues will reside because of lack of
17 functionality in that arena as well.

18 Specifically from a preordering vantage
19 point, as Mr. Stacy mentioned yesterday, MCI elected
20 to place on hold or to delay the development of our
21 interactive agent requests using the TCPIP protocol
22 based on SSL3 architecture. Bill Stacy defined that
23 yesterday as the interactive agent.

24 Our decision to place that on hold was
25 principally decided because of the fact that we don't

1 have a UNE-P offering in key states in the BellSouth
2 region. Preorder, obviously, is one of those
3 mechanisms that has a much greater impact on our
4 residential business customer -- on our residential
5 customers than it does on our business customers.
6 Therefore, until we have a UNE-P offering in key
7 BellSouth states, we will not be moving forward with
8 the development of preordering.

9 Now, MCI is committed to that development
10 and we're in the process of developing that
11 architecture today in the New York Bell Atlantic
12 region where we do have a UNE-P offering and we are
13 actively in the market with a commercial service
14 delivery method that allows us to be successful in
15 that market. So we will be moving forward
16 expeditiously with BellSouth as soon as we get that
17 capability for UNE-P.

18 From the ordering vantage point, where we
19 are is we are still in the midst of the developing,
20 tweaking, adding the necessary functionality for EDI
21 Version 7 with BellSouth. Specifically designed for
22 the delivery of orders associated with local number
23 portability and stand-alone loops and loops plus
24 number portability. That development effort has been
25 underway. I have some slides to talk about the

1 process we've been through thus far and some of the
2 issues that are still outstanding with that interface.

3 Provisioning is lumped into that, and
4 specifically, when I talk about provisioning with OSS,
5 I am specifically talking about the electronic
6 notifications that are necessary. Those would be the
7 service jeopardies. Those would be the completion
8 notices. Those would be the rejects. Those would be
9 the notifications that are necessary that feed the MCI
10 back-end system such that those systems know what the
11 status of orders are in BellSouth land as well as
12 allows us to kick off other processes downstream for
13 us. Particularly, for example, with the completion
14 notice. Our systems would kick off information to our
15 maintenance centers as well as to our billing centers
16 that we now have ownership of that customer.

17 From the maintenance vantage point, we never
18 elected to use the TAFI system that BellSouth offered
19 early in this whole OSS development cycle, but have
20 developed with BellSouth the electronic -- the ECTA
21 interface for maintenance with BellSouth based upon
22 the current industry standard.

23 There's an issue or so that exists with that
24 interface but we have been up and operational with
25 that interface for -- I would -- upwards of about six

1 months or longer. And then from billing, we're using
2 the same billing systems and functionality that AT&T
3 talked about earlier today so I won't go into those.

4 Okay. Let me take you through some of the
5 development that we have gone through with BellSouth
6 just to sort of get you up to speed of where we are,
7 and this is going to be from a historical perspective,
8 but it's going to have some bearing on some of the
9 things that we've been able to uncover as we move
10 through trying get this interface up and operational
11 and rolled out into a production environment.

12 Specifically, we began the development of
13 this interface about 15 months ago with BellSouth. As
14 a matter of fact, we began this development in January
15 of 1998 where we began to review the documentation
16 provided by Bell and work in teams with BellSouth to
17 go through that documentation, business rules, EDI
18 specifications and the like. And that process took
19 about three to four months to get through all of that
20 information.

21 Beginning in April through June, we began to
22 submit what we define and what the industry defined as
23 EDI simulation orders. The significance of that is
24 that we, on the MCI side of the interface, would
25 submit orders to BellSouth that we would generate

1 manually, send them through the Bell interface that
2 was up and operational at this time, such that before
3 we got to the coding of those actual EDI maps as is
4 defined in the technical realm, we would be able to
5 identify any errors in the documentations, any errors
6 that were in the operation of the system.

7 And through that process, we were able to
8 identify at least 14 problems either with the
9 documentation that was provided by Bell that we spent
10 the last three months reviewing and/or problems with
11 the operation of the interface.

12 Specifically, there was three things that we
13 uncovered. One was the inconsistency of the
14 documentation and the operation of the interface. The
15 other was the fact that there was no test environment
16 for local number portability orders.

17 What that means is, that when we did submit
18 local number portability orders as part of the EDI
19 stimulation testing, they were manually reviewed by
20 BellSouth's reps. In other words, we pull them --
21 they pull them off, look at them, say, "yeah, this
22 stuff looks right based upon the business rules, so we
23 think they'll be okay."

24 And then we also uncovered the fact that
25 Bell could not transmit to us electronic firm order

1 confirmations or completion notices throughout this
2 trial. We worked with Bell to try to get those issues
3 resolved and there were promises made as a result of
4 those findings that they would get those issues fixed.

5 We completed end-to-end testing in the
6 August time frame with Bell, but that end-to-end
7 testing, again, did not include local number
8 portability end-to-end testing because there was no
9 test environment to available to do that in.

10 Subsequently, in September of 1998 we
11 accepted the interface from BellSouth with the
12 promised enhancements that Bell committed to us that
13 would be necessary in order for us to use this
14 interface in a production environment.

15 Two things specifically that we needed Bell
16 to provide to us were partial migrations. Partial
17 migrations is necessary because when you initially
18 approach a customer who has been doing business with
19 BellSouth for an extended period of time, nine times
20 out of ten they're going to be reluctant to migrate
21 their entire service over to you. So the way that
22 you're going to prove to the customer that you can
23 provide the level of service necessary for them is to
24 take a portion of that service.

25 In order to do that we needed to send what's

1 been defined in the industry as partial migrations
2 over to BellSouth. BellSouth systems, at the time
3 that we received and accepted the interface, did not
4 support partial migrations. That was one
5 functionality that was absolutely critical to us.

6 The other one that was absolutely critical
7 was the fact that the Bell system did not support
8 electronic notifications for local number portability.
9 And specifically, it did not provide rejects and
10 clarifications electronically for LNP orders, nor did
11 they provide at the time automated maintenance -- or
12 I'm sorry -- missed appointment jeopardies and/or
13 service jeopardies.

14 So those were the commitments that Bell
15 committed to enhance the system.

16 The target date for partial migrations was
17 March 28th of 1998. So, you can see that that was
18 about six months after we had accepted the interface
19 that they got that functionality provided. And to
20 date, that functionality still hasn't been thoroughly
21 tested, but just recently they said that that
22 functionality was available.

23 As well as electronic rejects for -- or
24 electronic rejects and clarifications also came on
25 line per Bell 3-28. We're still, to date, waiting for

1 service jeopardies for local number portability
2 orders.

3 **COMMISSIONER JOHNSON:** I'm sorry. You said
4 the electronic rejects that that is -- that they did
5 implement?

6 **MR. GREEN:** Bell shared with us that that
7 functionality had been integrated into the interface
8 as of 3-28. We haven't had the opportunity to test
9 through that, but that's a commitment that Bell has
10 said they've met.

11 **COMMISSIONER JOHNSON:** So both the partial
12 migration and electronic rejects --

13 **MR. GREEN:** Electronic rejects, both on
14 3-28.

15 **COMMISSIONER JOHNSON:** They just haven't
16 been tested?

17 **MR. GREEN:** Right. By MCI or any other
18 provider in the industry.

19 **COMMISSIONER JOHNSON:** But service jeopardy
20 for number portability, that is not in place?

21 **MR. GREEN:** Still is not available. Their
22 commitment date for that functionality is May of 1999.
23 So, this month. That is suppose to be there. Okay.

24 From there, let me walk you through the
25 operational trial information that we did with

1 BellSouth, and let me share with you just to make sure
2 everybody is grounded on operational trial.

3 This operational trial was conducted by MCI
4 as an effort to prove that the interface actually
5 operated as prescribed. In other words, even though
6 we knew that we were missing some functionality, we
7 wanted to confirm that the functionality that Bell
8 said was there, that we believed was there, was
9 actually there and could be used in a production
10 environment.

11 We used real orders. And when I say real
12 orders, they were test orders from MCI. They were
13 real to BellSouth. They had no idea that we were
14 sending these orders as part of an operational trial.
15 They believed that these were real production orders
16 and were to treat these as real production orders.

17 MCI used their own facilities to submit
18 these orders. What we submitted as part of the test
19 was stand-alone loop orders, local number portability
20 with loop orders. These were full migrations of
21 customers' accounts.

22 And subsequently, throughout the trial as we
23 got these lines installed, obviously we needed to
24 disconnect these lines as well. So subsequent or
25 after January, we began to issue some disconnects and

1 through the process we had some cancellation orders
2 that we submitted as well.

3 Okay. The operational trial identified a
4 number of problems that were existent with the
5 BellSouth interface. Primarily, there was a lack of
6 flow-through. In other words, there were -- all of
7 the orders that we submitted through the Bell
8 interface were handled manually; had some means or at
9 some point were handled with manual intervention.

10 We received from BellSouth invalid rejects.
11 Now, let me define an invalid reject. MCI submits an
12 order that is based upon the business rules provided
13 to us by BellSouth. BellSouth receives that order via
14 the electronic interface, and subsequently sends us
15 back a reject for an error that -- for a problem that
16 is not an error.

17 In other words, they may reject and have
18 rejected the orders for invalid user name. Well, the
19 user name on the order was the right user name on the
20 order, but they rejected it in error. Says that a
21 service rep looked at that order, wasn't quite
22 familiar with what the rules should have been and
23 rejected that order back to us, delaying the MCI
24 process and impacting our process as well.

25 Let me talk about what happens when we

1 receive manual notifications that we transmit
2 electronically.

3 MCI has built on their back-end systems that
4 interface with the Bell EDI system. So what we are
5 looking for when we transmit orders across to
6 BellSouth are electronic notifications back. We are
7 looking for those confirmations that they received the
8 orders, that either they are negative or affirmative,
9 what's defined as 997s. We are looking for firm order
10 confirmations. We are looking for rejects. We are
11 looking for clarifications. We are looking for
12 completion notices. We are expecting all of that
13 information to come back electronically because our
14 systems are set up such that if we do get it, it
15 triggers some response downstream.

16 What happens if I get these things manually
17 is that now I have to deploy people to go find the
18 order because it comes across fax. What is it? And
19 then go update our systems to allow our service reps
20 to make the necessary changes to the order in order to
21 get those things sent downstream.

22 And for 15 orders that we sent through this
23 interface between November 1998 and January 1999, that
24 was a horrendous process. Very horrendous process.

25 We also were missing completion

1 notifications. We, on many instances, didn't receive
2 a completion notice whatsoever. And again, a
3 completion notice is important because it allows MCI,
4 No. 1, to know that we should begin billing our
5 customer. No. 1.

6 No. 2, we should expect to begin to receive
7 billing from BellSouth on "XY" date, as well as being
8 able to communicate to the customer that your service
9 is up or it's not up or we have some problem. So,
10 those things are important.

11 Jay spent a lot of time on performance
12 measurements, going through timeliness of
13 notifications. Well, during our trial, our
14 operational trial with BellSouth, we identified the
15 fact that our notifications were very untimely, as
16 well as there was inconsistency in processing of
17 orders, specifically there with the disconnects and
18 the cancellations orders that I will talk about later.

19 I mentioned already that all of the orders
20 that were submitted in November to January that were
21 for loop, loop and LNP were handled at some point
22 during the transaction manually. All of the orders --
23 let me reiterate here -- that we sent through the
24 interface was either defined by Bell as simple,
25 flow-through and/or 100% flow-through.

1 So we specifically issued orders that we
2 believed should flow through the interface;
3 stand-alone loops, loops plus LNP. And Bill in his
4 documentation yesterday showed that LNP orders flow
5 through as well as loop orders flow through so you
6 would suspect that loop plus LNP orders should flow
7 through.

8 **COMMISSIONER JACOBS:** I'm trying to
9 remember. This morning I think we heard that none of
10 the UNE orders that AT&T sent through were
11 flow-through. There was manual intervention in all of
12 those. Is it -- do the business rules provide for
13 automatic flow through of UNE orders?

14 **MR. GREEN:** The expectation, when we
15 developed our system, was that stand-alone loop
16 orders, which are UNE orders, loop and LNP orders
17 would flow through the interface without human
18 intervention. So the expectation there is,
19 absolutely.

20 Of the -- from the lack of flow-through we
21 received 20 rejects on the 15 orders that we submitted
22 through the Bell system. Some of that was -- some of
23 those were valid rejects. Others, and many of those
24 were invalid rejects. Rejects that we should have
25 never received.

1 And again, what we also saw was a situation
2 where we received individual rejects for multiple
3 errors on an order. What I mean is that once the
4 order gets sent through the system, Bell's commitment
5 to us is that they will send back a reject or
6 clarification identifying all of the errors, not just
7 one. In many instances we got multiple clarification
8 for errors on the same order, which that shouldn't be
9 the case as well.

10 And then again, most of the FOCs that we
11 received were received manually as opposed to
12 electronically which caused that problem in our
13 back-end systems of our service reps having to grab
14 that information and update our system so that we
15 could keep track of it.

16 Now, during this time we were communicating
17 with BellSouth and identifying for them the problems
18 that we were uncovering, so it's not as if we were
19 gathering this information to all of a sudden come to
20 a Commission hearing or go to the FCC and say that
21 things aren't working the way that they're suppose to.

22 So we began to communicate with BellSouth
23 shortly after we began to see these types of problems.
24 We identified through -- from the November through
25 December, 20 issues. Bell responded to our issues in

1 the January time frame, so it took them about 60 days
2 just to respond back to us with what they believed the
3 issues were. And of the nine problems we
4 identified -- or of the 20, rather, that we identified
5 with BellSouth, nine of those were identified as
6 BellSouth training rep issues.

7 Let me give you a couple of examples.
8 Multiple clarifications via EDI was identified as a
9 BellSouth service rep training issue.

10 Local number loop and number portability
11 missing the firm order confirmation was identified as
12 a BellSouth service rep training issue.

13 So there is a number of things in here that
14 if the system was fully automated, supported total
15 flow-through, you would not expect to see a situation
16 where it was a BellSouth service rep training issue
17 for things that shouldn't involve a BellSouth service
18 rep.

19 Okay. Next slide, Dee.

20 Of the rejects that we did receive, 60% of
21 them were invalid. And again, invalid reject reasons
22 were they ran the gamete, but the -- I will jump down
23 a slide.

24 The primary reasons that Bell rejected our
25 orders in error was the fact that they rejected valid

1 network channel codes that we put on the order that
2 were provided to us by Bell, and the fact that they
3 rejected our end user names.

4 Now, let me explain the end user name
5 scenario, if you would. When you submit a new
6 installation order for a loop, you have control over
7 what that end user name is going to be. MCI, for
8 these trials, so that we could keep track of them,
9 were placing end user names of EDI Atlanta-02 on the
10 order.

11 Well, the Bell service rep, who is
12 manipulating these orders, was expecting to see a
13 person's name. Therefore, they were rejecting these
14 errors in order -- I mean, they were rejecting these
15 orders in error, which was a problem because we can
16 put any name on that order that we so choice because
17 we are maintaining a relationship with that customer.

18 Other problems were that three of the
19 invalid rejects we received electronically. Now, that
20 begs a question. You wouldn't expect to receive an
21 invalid reject electronically. Says one of two
22 things.

23 One is, either the system is programmed
24 incorrectly and kicking you back these errors when it
25 shouldn't; or that they're service reps involved in

1 this process and that they have the ability to
2 manipulate the EDI system such that they can send you
3 back EDI transactions as opposed to sending them back
4 to you via fax, which we believe the latter to be the
5 case.

6 And again, I talked about the fact that we
7 received multiple rejects, and at least on two orders
8 we received multiple invalid rejects. So not only did
9 we receive the first invalid reject, but we received a
10 second invalid reject on that exact same order.

11 And I'll say this. That for the most part,
12 when we got an invalid reject we did absolutely
13 nothing with the order. We didn't send another order
14 in. We would call BellSouth and tell them that this
15 order should not have been rejected and then
16 subsequently, in at least two instances, we received
17 additional invalid rejects.

18 **COMMISSIONER JOHNSON:** I think I must be
19 missing a major point here. You are sending these
20 orders over electronically?

21 **MR. GREEN:** Yes. Via the EDI 7 interface
22 that was turned up in September.

23 **COMMISSIONER JOHNSON:** And you stated
24 though, that you don't expect to receive the rejects
25 back electronically. Wouldn't you -- when you were

1 talking about the machine-to-machine interface, if the
2 user name was invalid because you didn't use the right
3 business code, wouldn't you want it to come back
4 electronically and --

5 **MR. GREEN:** There is two points there.
6 First of all, that the system is coded correctly. I
7 wouldn't expect to see an invalid reject
8 electronically. Otherwise, that's suggesting to me
9 that the system is not designed correctly.

10 **COMMISSIONER JOHNSON:** I see what you're
11 saying. I was just thinking -- so, is the fact that
12 it was an invalid --

13 **MR. GREEN:** But I do expect to get rejects
14 electronically. I just don't expect to get those that
15 are invalid electronically.

16 **COMMISSIONER JOHNSON:** I'm following you.

17 **MR. GREEN:** Okay. Let me go to completion.

18 **COMMISSIONER JACOBS:** Excuse me. Do you
19 have the front-end editing on your EDI -- front-end
20 gateway on yours, your inputs to EDI?

21 **MR. GREEN:** Let me make sure I heard the
22 question.

23 **COMMISSIONER JACOBS:** If I recall, earlier
24 this morning AT&T had a -- sort of like a
25 pre-processor, if you will, on their inputs to EDI.

1 Do you have a similar process?

2 **MR. GREEN:** Absolutely. When we build the
3 interface with BellSouth we take the business rules.
4 And the reason the business rules are so important is
5 it allows us to develop the editing capability on our
6 front end so that if we were inputting information
7 correctly -- in other words, if one of the business
8 rules, for example, said that a Network Channel Code,
9 for example, was all ALFAs or should be five ALFAs,
10 and we go in and we -- our service reps enter the
11 information and they get fat fingers and type it in
12 wrong, and let's say that they put some numerics in
13 there and make it eight characters. Well, our system
14 will reject that order back to our service rep because
15 it doesn't meet the business rules for BellSouth. So
16 there is a pre-editing function that is included in
17 our front-end systems.

18 Completion notices. 57% of the orders or 8
19 out of 14 did not receive a completion notice. Now,
20 you see that there is only 14 there. That's because
21 one of the orders we had to cancel due to some
22 inherent problems and there was a couple of problems.

23 One was, MCI had made an error on that order
24 so we had cancelled that one because another order was
25 actually the right one, so we only expected to see 14

1 completion notices. Then we only received 8 out of
2 14.

3 I will say that all of the completion
4 notices, when we began to receive them, came
5 electronically. We did not receive one completion
6 notice manually. One completion notice, however, we
7 received five days after we cancelled the order. So,
8 you wouldn't expect to see a completion notice on an
9 order that was cancelled. And I will talk more about
10 some of the issues we found with cancellation orders.

11 And then, again, this is one of those
12 situations where Bell identified this issue as a
13 service rep training issue. So, again, it baffles MCI
14 to understand how it's a service rep issue if these
15 orders are truly flowing through the interface as
16 tallied.

17 Lack of timely notifications. And I think
18 this correlates fairly well with some of the
19 information that Jay Bradbury of AT&T had up here
20 earlier this morning.

21 Bell's commitment to MCI via our
22 interconnection agreement is that they will provide us
23 with firm order confirmations in four hours; four
24 hours from the time that we submit a clean order to
25 BellSouth. Their rejects are one hour from the time

1 that they receive the order from MCI, and we will get
2 completion notices within one hour of the service
3 being completed.

4 As you can see there from the results of
5 just our 15 orders, Bell didn't meet those objectives.
6 They failed to meet those objectives in every way.

7 On average -- and these I will say, in my
8 numbers here, I excluded weekends and holidays. Now,
9 that's to give Bell the benefit of the doubt. One
10 would suspect that the system doesn't care about
11 weekends and holidays, so if I sent an order, that
12 order would at least be processed through the system.
13 It may not be worked by BellSouth representatives if
14 it needed provisioning, but I would expect that the
15 system, if the system was up, would be transmitting
16 the information regardless of if it's Christmas Day or
17 Saturday. Okay.

18 So these time frames that you see here do
19 not include even those weekends and holidays, so the
20 number would be higher if I did.

21 On average 2.9 days to return a reject.
22 4.69 days to return a FOC, and for the completion
23 notices -- I'm sorry -- that I did receive, on average
24 three days after the order was due to be completed.

25 I mentioned that we submitted some

1 additional orders, some cancellation orders, some
2 disconnect orders, but we also transmitted three
3 additional loop orders, two cancellation orders and 14
4 disconnects.

5 Let me talk about the cancellation problems
6 because these may not seem like a big deal and you
7 don't hear much about -- you know, you hear a lot
8 about migrates as-is, migrates as specified, new
9 installs, add, move, changes, but what about
10 cancellations and disconnects? Those things never get
11 discussed. And unfortunately -- well, I guess I'd say
12 unfortunately or fortunately, we stumbled on this. We
13 did not expect these things to be an issue. We
14 expected these things to flow through the system not
15 have any problem.

16 But what we found was that the cancellation
17 orders, when we did send them weren't cancelling the
18 original order that we submitted. In other words, I
19 submitted an order to be installed on -- let me pick a
20 date. December 5th. I send a cancellation order in
21 for that order on December 1st. What I get back from
22 BellSouth is a firm order confirmation for that
23 original installation order. I don't get a firm order
24 confirmation back on the cancellation order. That
25 costs us some great concern.

1 I also got those FOCs back late. They
2 didn't come back within the four hour time frame.

3 **COMMISSIONER CLARK:** Let me ask you to -- go
4 back to what you get is the firm order confirmation
5 for the original ordering. Do you get anything
6 subsequent to that?

7 **MR. GREEN:** Not on those cases. I will say
8 that we -- throughout this trial, sometimes they --
9 which is why I call this inconsistency in order
10 processing. Sometimes it was done right. Other times
11 it was not. And for the most part, it was not done
12 correctly. So the answer is, sometimes yes, most
13 times, no.

14 The FOCs were consistently late with these
15 orders, and in at least one instance, I received a --
16 back to the completion notice I received once when I
17 had cancelled an order. But another time, I received
18 a missed appointment jeopardy when I cancelled an
19 order because we weren't ready to meet them at the
20 switch. We were going to turn up the loop, obviously,
21 because we disconnected or cancelled the order.

22 Now, you may not think that it's a big deal
23 if they're not cancelling the orders, but the problem
24 is that if I'm dealing in a customer scenario and the
25 customer calls and cancels the order for whatever

1 reason, they may want to change and it's easier for us
2 just to cancel the order than to try to submit
3 multiple sups for BellSouth, we may go back in and use
4 the exact same facilities on this order that we were
5 using on the original order. Bell would reject that
6 order because the facility is a pending installation.
7 That's a problem.

8 They may ultimately -- if it didn't require
9 our services, they may ultimately go ahead and install
10 that service, send us a completion notice and then we
11 have all kinds of billing issues and other
12 installation services being installed at the customer
13 site that we aren't expecting.

14 It also throws our systems out of sync.
15 When we send orders to BellSouth -- again, I talked
16 about our back-end systems keeping track of what we're
17 doing with BellSouth. If they are not processing our
18 cancellation order, then my back-end systems are out
19 of sync with their systems and that causes us some
20 problems.

21 Obviously, we would have to throw human
22 resources in to resolve those issues, which again,
23 drives, you know, cost into our business, delays and
24 other headaches, which on a volume basis, you would
25 expect to see a number of cancellation orders. We're

1 trying to do an operational trial to prove that the
2 system works the way that it's suppose to, so these
3 caused us some pretty good concerns.

4 On the disconnects, this is a real
5 interesting scenario. And again, let me reiterate
6 that these orders were submitted just a couple months
7 ago now. So this is an interface that has been up and
8 operational for some time.

9 I'm surprised that nobody else, out of all
10 the 17 or 200,000 orders that have been submitted
11 through this interface, hasn't identified these as
12 issues. Maybe these are issues with the customized
13 main frame interface that we're developing with
14 BellSouth. But, again, if the processes are the same,
15 it's just the interfaces or the software presentation
16 to the customers, one would expect to see similar
17 problems.

18 On the disconnects, when we started to do
19 the disconnects, we didn't send all 14 at one time.
20 We sent two disconnects originally and ran into
21 similar problems with the installations. They were
22 being rejected in error, late FOCs. Called BellSouth.
23 "What's going on." Sent two more. Those two flowed
24 through flawlessly. FOCs on time. Done on the date.
25 Completions. Everything. We thought the problem was

1 resolved.

2 Well, since we thought the problem was
3 resolved, we sent 10 more. We sent those 10 on
4 March 24th or 23rd. Bell rejected all of them in
5 error. But they did not, in this case, send us back
6 either a manual or an electronic reject. They just
7 sent us nothing and communicated with us via e-mail.

8 They confirm that they should not have
9 rejected these orders in error. They then sent us
10 firm order confirmations, but they sent the firm order
11 confirmations on April 7th, which is about 15 days
12 after we submitted the original disconnect order. And
13 then they ultimately got the disconnect done and the
14 completion notice came. But, again, one would not
15 expect to see a problem like that. If we had had
16 shorter due dates on our disconnects than we did, then
17 we would have had a problem with the service being
18 disconnected on time.

19 Again, we have the same issues with customer
20 relationships; billing issues on both sides, billing
21 to the customer, billing from BellSouth. So all of
22 those things are issues for us that we are today
23 trying to get resolved with BellSouth.

24 Some of the unresolved problems that are
25 still existent today is -- and Bell knows about many

1 of these. And some of these -- and I'll identify
2 which ones on this list. Again, Bell has made the
3 statement that they have resolved that issue in their
4 interface.

5 But, to date we still have a problem of
6 missing circuit ID when we get a firm order
7 confirmation back. And let me talk a little bit about
8 that.

9 When we send a loop order to BellSouth, what
10 happens is they assign a circuit ID to that order and
11 that circuit ID is communicated to the CLEC via the
12 firm order confirmation. So when you get the firm
13 order confirmation, you're looking for the unique
14 identifier for that circuit. That's important in
15 order to reference that circuit back to BellSouth. If
16 you need maintenance; if you need to clarify some
17 billing; whatever the case may be, the only way you
18 can identify that circuit to them is through circuit
19 ID. It's similar to a telephone number. If you don't
20 have your telephone number there's no way that they
21 can identify the line. This circuit ID represents the
22 telephone number equivalent for stand-alone loops.

23 Those aren't coming back to us on firm order
24 confirmations. And, I guess, the curious part is, it
25 doesn't happen all the time. Sometimes it does.

1 Sometimes it doesn't. And that's a problem in and of
2 itself.

3 Bell committed to fix this problem by 4-24,
4 which was just, I guess, a week or two ago. We have
5 had problems as recent as 4-29 with not receiving a
6 circuit ID on a firm order confirmation. So, very
7 recent problem. Still a problem nonetheless.

8 **COMMISSIONER JOHNSON:** Would that -- that
9 would be something that should be done electronically?
10 If something is processing, you have a firm order
11 confirmation, some electronic system should also give
12 you your circuit ID or would that be a manual --

13 **MR. GREEN:** Well, unfortunately, I don't
14 know how Bell is doing it behind their systems, but if
15 it's flow-through and there is no manual
16 interpretation, if I take that literally, then that
17 means that there is no human intervention.

18 **COMMISSIONER JOHNSON:** So it should be
19 consistent.

20 **MR. GREEN:** So it should be consistent. No
21 end-to-end testing for local number portability.
22 Bell's converted their major metropolitan areas over
23 to LNP so ILNP is not an option.

24 MCI is going to be moving forward. Once all
25 of these issues get resolved, then we're were hoping

1 that we can work through many of these issues with
2 BellSouth in the next month or so. Our plan is to
3 turn this interface up into production on June, July,
4 1999.

5 We still don't have a test environment for
6 local number portability. What that means is, again,
7 we won't know what types of problems we should expect.
8 I mean, our history now with using this interface
9 suggests to us that we should expect to see some
10 problems.

11 When I released this service into -- when I
12 released this interface into production, what that
13 means is that my LNP orders are subject to problems
14 that we have not yet been able to identify because of
15 a lack of a test environment with Bell. That means
16 that I will have additional hand-holding of these
17 orders. In other words, my reps are going to sit
18 there and track these orders through so that we make
19 sure that even if they fall off for manual processing,
20 they don't impact the customer commit times of which
21 we will have to extend as well because we suspect that
22 there will probably be problems.

23 It means that our wrap-up will be much
24 slower than it ordinarily would be because we are
25 going to step into this thing gingerly as opposed to

1 just rushing in after we know that the interface is up
2 and operational.

3 So the lack of that test environment is
4 something that's been around now since we began the
5 development of this interface. We identified this
6 back in June of 1998 that there is no test environment
7 and today there still is none.

8 As you heard KPMG -- not KPMG. I'm sorry.
9 Telcordia suggest the other day is that a test
10 environment is one of those things that CLECs
11 absolutely need in order to validate the operation of
12 the interface.

13 I haven't talked a lot about maintenance,
14 and I mentioned that in my opening that there was
15 still a problem with the maintenance interface with
16 BellSouth. And the primary problem above and beyond
17 those things that were identified by AT&T as far as
18 functionality, is the fact that the interface does not
19 support what Bell has designated as a nondesign loop.

20 And I'm not sure if you all are familiar
21 with design or nondesign, but it is a distinction that
22 Bell has made for two wire loops. This interface, to
23 date, does not support the ability to transmit an
24 order via ECTA to BellSouth for nondesign loops.

25 Bell's commitment, again, their promise to

1 fix this flaw is this month. And again, I believe
2 this is another one of those scenarios where they have
3 shared with us within the last few days, week or few
4 days, that the ECTA interface now supports nondesign
5 loops. Again, it's a scenario. It's a situation
6 where we need to go out and prove that fact out.

7 We talked about errors, processing
8 cancellation orders. Those things still exist. Have
9 not been resolved to date to our satisfaction, so
10 we're still going to need to push through getting
11 those things identified and that process fixed and
12 resolved.

13 You see here that, you know, I also talk
14 about nondesign loops from the ordering, not only from
15 an automated vantage point, but from a manual vantage
16 point as well. And that might be a little deceiving.

17 Back in August we identified the fact that
18 these business rules that we received for developing
19 of this interface in January did not include the
20 business rules for nondesign loops, which was news to
21 us because we found out about the August time frame
22 that nondesign loops were available and that there was
23 some pricing differences between design loops and
24 nondesign loops.

25 The issue that is before us today, and just

1 recently as this afternoon or this morning when I
2 called about it, the issue with nondesign loops is
3 this.

4 Bell has not been able to provide us with
5 the definitive concrete business rules for how to
6 order those nondesign loops. We did, in fact, submit
7 a nondesign loop order manually. But that was through
8 the support of BellSouth in getting that order
9 through.

10 Specifically, there's a unique piece of
11 information that needs to be placed on the nondesign
12 loop order. That's called a miscellaneous account
13 number. And that's different than ordering a design
14 loop because I don't need that information for a
15 design loop.

16 Bell has yet to inform us, No. 1, where to
17 get that information from, and just recently confirmed
18 with us that that information should be ten ALFA
19 numerics as opposed to 12 excluding dashes. So we've
20 had some difficulty in getting the necessary business
21 rules for ordering those types of services from Bell.
22 Up until just recently, the last day to -- or let me
23 say within the last week, we've gotten a lot closer.

24 Part of the problem here is that you don't
25 know these things until you start to dive into the

1 layer of detail and then all of the issues start to
2 pop out as you start to dive in for additional layers
3 of detail, which is a problem with the whole
4 development process that I will talk about coming up.

5 Obviously, we talked about service
6 jeopardies for LNP; the fact that those things still
7 don't exist today and those are as important as any
8 other notification that's being provided by Bell.

9 Talked about nondesign loops and the
10 maintenance interface.

11 And then there is this other issue for
12 adding a line to an existing service. We ran into
13 this scenario -- again, this is one of those things
14 that you don't hear about when you're hearing about
15 specified migrations or migrates as-is or new orders
16 or UNEs or things of that nature, but something as
17 simple as adding a line to an existing order.

18 If I don't have the circuit ID for the
19 orders that I submitted I can't, No. 1, add a line to
20 an existing service. So that's one of the impacts of
21 not having circuit ID.

22 But another one was the fact that we
23 couldn't even, up to last week, even get an order into
24 the Bell system for adding a line to an existing
25 service. Those things were just rejected on face

1 value and Bell informed us that they could not support
2 those.

3 Again, this is one of those situations where
4 just recently, Bell has communicated to us that you do
5 now have the ability to get an order through. We've
6 sent an order for adding a line to an existing
7 service. It made it through the interface. It wasn't
8 rejected and we did get a firm order confirmation back
9 on it and we're waiting for it to be installed.

10 That's only one order. I don't know what
11 they're doing behind the scenes to make sure that that
12 order gets through. But I would suggest that there
13 needs to be more volume testing of these problems
14 before one is assured that the issues have been fixed.

15 **COMMISSIONER JOHNSON:** And in order to fix
16 the adding a new line problem that presupposes that
17 they fix the circuit ID problem?

18 **MR. GREEN:** Right.

19 **COMMISSIONER JOHNSON:** But you stated
20 that -- or did they already state that they've fixed
21 that problem?

22 **MR. GREEN:** No, they didn't. Even though
23 they don't send us the circuit ID, we pick the phone
24 up and say, what's the circuit ID on this order
25 because, again, these are trial orders. These are

1 only 15. So we're able to get it, it's just not
2 there.

3 **COMMISSIONER JOHNSON:** Got you.

4 **MR. GREEN:** Okay. Okay. Good. Now, let me
5 bring this all back because, you know, we talked about
6 what we've done with the interface, how we've used it,
7 how we tested for its operation. But I think one of
8 the things that is key here that is a consistent
9 thing, not only through this development but going
10 forward, is the fact that there have been a number of
11 commitments, promises, statements made by Bell as to
12 the operational readiness of their interface.

13 Specifically, flow-through for simple UNEs
14 has been available since December 1996. We proved
15 that that functionality has not been available or at
16 least wasn't available as early as January, 1999. And
17 Bell themselves have actually confirmed the fact that
18 that flow-through was not available in a letter.

19 Automated nondesign loop ordering since
20 October 1997. Well, in light of the fact that the
21 business rules weren't included in January 1998 and in
22 light of the fact that they just recently got me the
23 specifications in April of 1999, one would suggest
24 that that functionality wasn't available as well.

25 LNP process would be automated by first

1 quarter 1998. Well, through our operational trials we
2 proved that loop and LNP orders fell out from manual
3 processing. So, again, another claim made by
4 BellSouth that was proven not to be operationally
5 ready.

6 Commercially ready interface for EDI 7.0 in
7 March of 1998, as well as electronic rejects and
8 notifications available at that same time for that
9 same interface.

10 Well, again, through our operational trials
11 we proved that this interface, obviously, couldn't be
12 commercially ready because sending 15 orders all being
13 handled manually, all having manual notifications, is
14 not the definition or should not be the definition of
15 commercially available. As well as, proving even
16 during our EDI simulation testing that Bell at that
17 time, which was back in April, May, June of 1998,
18 could not provide electronic rejects and notifications
19 for even non-LNP orders.

20 And then, you know, the last one there.
21 That again, has been confirmed by Bell and just
22 recently enhanced by them. The fact that they're
23 electronic bonding maintenance interface supported
24 nondesign loops back in 11-1997. Obviously, that's
25 not true because they just fixed that problem in May,

1 per them; untested, by us, 1999.

2 Obviously -- I mean, there is a number of
3 issues with the development process. One is easily
4 identifiable which is the lack of urgency around
5 getting many of these issues resolved.

6 Again, we identified in this process with
7 Bell through the development, issues that were
8 important to us that were not included in the
9 interface. I mean, on average it takes Bell's account
10 team up to, at the minimum, 30 days to respond back to
11 issues that we address to them.

12 To give you some specific examples, we
13 identified the limitation of being able to add a line
14 to an existing account back in August of 1998. Bell
15 just recently again said that they resolved that issue
16 in March, which is almost eight to nine months after
17 we identified the problem to them.

18 Another instance is the fact that it's taken
19 over a year for LNP service jeopardies and around a
20 year for rejects and clarifications with LNP related
21 orders, on top of seven months to fix this nondesign
22 loop issue with the maintenance interface. So you can
23 see that it takes some considerable amount of time,
24 once the issue is identified, to move Bell to getting
25 these issues fixed and resolved.

1 Promise functionality. We've gone through
2 that. There -- it just wasn't available. Those
3 things that they said was there, was not there when we
4 began to transmit these orders. That's obviously a
5 problem because you're developing these interfaces
6 with the belief, with the hope, with the realization
7 that those things will be there. When you prove that
8 they're not, that's discouraging and causes you some
9 pain in your own company when these things aren't
10 working the way that they're supposed to.

11 I define this whole development process with
12 Bell as hit and miss. I mean, unless we're driving to
13 uncover it, we're not going to find out about it. The
14 fear there is that a year from now, 18 months from
15 now, we're going to stumble on a whole series of
16 additional problems that are out there. That may be a
17 little too late to get any expedited resolution
18 through because you don't have the same leverage with
19 the desire of the Bell operating company to get into
20 End Region LD.

21 So the hit and miss process that we go
22 through is really in effective for development of
23 these interfaces.

24 And then lastly is the inadequate systems
25 testing by Bell. Now, you know, Bell has stated that

1 their systems have been tested by Ernest and Young and
2 that they do their own internal testing of these
3 interfaces to prove that these interfaces are
4 operationally ready in lieu of commercially available
5 volumes.

6 Well, I'm not suggesting that my 15 orders
7 were commercial volume. But I am suggesting that that
8 testing was not adequate to identify the problems.

9 I mean -- let me draw another point here.
10 In Mr. Stacy's testimony yesterday there was this -- I
11 think Jay touched on it as well. There was this "E"
12 category for errors and he identified those as
13 BellSouth programming errors sometimes. Well, you
14 wouldn't expect to see those "programming errors" in
15 an interface that is commercially ready. You just
16 absolutely would not expect to see those.

17 **COMMISSIONER JOHNSON:** You stated that, I
18 guess, on your first bullet that the lack of urgency
19 in resolving issues and providing the functionalities
20 that, I guess, that points are promised, but there's a
21 hit and miss proposition. What do you think it would
22 take to sufficiently motivate?

23 You also mentioned, kind of as an aside,
24 that getting into long distance doesn't seem to be
25 sufficient enough motivation in your opinion in this

1 particular region. What could we do then, assuming
2 that getting into long distance isn't an objective
3 right now for the company? What do you suggest that
4 we could do to expedite the process?

5 **MR. GREEN:** I'll answer that, but let me
6 just make sure I clarify a point. I wasn't suggesting
7 that getting into End Region LD was not a significant
8 enough incentive for Bell, but if they got in before
9 we identified the other problems through this hit and
10 miss process, we go through and develop it, we would
11 lose the leverage to move them to get those issue
12 resolved even more quickly than they're resolving them
13 now.

14 **COMMISSIONER JOHNSON:** Well, obviously, the
15 leverage --

16 **MR. GREEN:** Is --

17 **COMMISSIONER JOHNSON:** Looking at your
18 presentation, it doesn't suggest that that is -- the
19 leverage is moving them any quicker.

20 **MR. GREEN:** Or quickly at all.

21 **COMMISSIONER JOHNSON:** And, again, just on
22 your presentation --

23 **MR. GREEN:** Right. Or quickly at all. What
24 I believe is the next step to try to move this is
25 addressed on my final slide and it's an excellent

1 segue.

2 **COMMISSIONER JOHNSON:** Could you also, when
3 you address that, as a part of your summation --
4 perhaps not in a wish list kind of way. But if there
5 are best practices, some things that other companies
6 in Florida or that you've dealt with that are doing
7 that works or that works well, just a couple of those,
8 and maybe you could do something on a follow-up basis.

9 But you pointed to quite a few things and
10 you were excellent in providing us with some real life
11 examples of things that were not working. It would be
12 helpful for me to gage, too, is it just not working in
13 Florida in BellSouth's region, or is it not working
14 across the nation. And is this something that, you
15 know, is unique to the South or -- those kinds of
16 things would at least give me some perspective.

17 **MR. GREEN:** Okay. Let me do my best to try
18 to address that. Obviously, you can tell from the
19 slide that where I think the direction should head
20 from here is driving towards some type of third-party
21 testing of the operational interfaces. I mean, that
22 moves us out of this, you know, "Well, Bell says it
23 works and MCI says it doesn't and AT&T says it
24 doesn't." I mean, it's similar to what's going on in
25 New York, and I think that's what has allowed the

1 process to move more quickly in the Bell Atlantic New
2 York region.

3 And you see a movement through various
4 states, a number of states, actually, moving towards
5 third-party testing.

6 Ideally for us it would be based upon the
7 third-party testing format that is established in New
8 York as opposed to some of the others that are going
9 on in other parts of the country, primarily because
10 that process tests the whole gamete of order
11 functionality, not just the functionality that's been
12 developed by an individual CLEC and oversight of CLEC
13 to CLEC testing, but actual developing the interface
14 from the ground up, using the documentation that's
15 been provided by the RBOC that will allow anybody
16 coming behind a third-party test to build very similar
17 interfaces. And again, addressing the whole gamete of
18 ordering capabilities.

19 They can replicate commercial volumes. I
20 mean, until we get the interfaces up and operational,
21 until we get some of the capabilities that we need in
22 order to move forward, we don't expect to see
23 commercial volumes any time soon.

24 So they can replicate commercial volumes.
25 And again, commercial volumes are going to be those

1 things that flush out the errors in the system that
2 will move us from this hit and miss.

3 One of the things that's worked so well in
4 the NYNEX region or -- I'm sorry -- the Bell Atlantic
5 New York region -- history there -- is the fact that
6 there are exceptional reports that are filed by KPMG
7 and it gives the CLEC participants early
8 identification of problems that they may not have
9 encountered yet or may not encounter for some time
10 down the road. So it's a way for them to get those
11 issues addressed and closed via this CLEC third-party
12 RBOC process.

13 So I think that's the direction that things
14 need to head. We've been doing this for two and a
15 half years and MCI is serious about getting into the
16 business where there is an opportunity. We are in the
17 business in New York. We are doing commercial volumes
18 there. And we're fairly successful. There is gaps in
19 the Bell Atlantic interfaces as well as gaps in the
20 BellSouth interfaces.

21 So to address your question about, is it
22 unique to the South, I don't think it's unique to the
23 South. I think it's just -- I think it's unique to
24 the process because everybody, I mean, truly is going
25 through the exact same process to try to get these

1 interfaces built.

2 And to give credit where it's due, there is
3 companies out there that are trying to look for ways
4 to try to lessen the pain to develop these interfaces.
5 But, you know, in my opinion, those may not quite be
6 ready yet as well.

7 So, I think the most immediate approach is
8 probably going to be third-party testing and then
9 there may be some other things that flow out of that
10 that allows this Commission and other Commissions to
11 make a prudent decision on whether or not the
12 interfaces are operational or not.

13 **COMMISSIONER JACOBS:** Do you share in the
14 view that the TAG offerings don't address -- don't
15 adequately address the inadequacies of the EDI?

16 **MR. GREEN:** MCI is not a supporter of TAG.
17 We are a supporter of the EDI application for
18 preordering.

19 **COMMISSIONER JACOBS:** Mainly because of
20 volume issues?

21 **MR. GREEN:** From our vantage point, it's
22 mainly from a systems vantage point. We have an EDI
23 system that's up and operational. It only makes sense
24 to have a preordering functionality that's based upon
25 EDI as well. Gets us out of the habit of maintaining

1 two different protocols for one operation. And then
2 that operation is a sale to a customer.

3 So, I'm going to refrain from addressing TAG
4 because MCI has not been a participant in the
5 development of TAG. And if there is no other
6 questions, that concludes my presentation.

7 **COMMISSIONER DEASON:** Okay. Thank you. Any
8 other questions? We're going to take a lunch recess.
9 We'll reconvene at 1:45.

10 (Thereupon, lunch recess was taken at
11 12:40 p.m.)

12 - - - - -
13 (Transcript continues in sequence in
14 Volume 3.)

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