ORIGINAL

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF W. KEITH MILNER

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 990750-TP

AUGUST 16, 1999

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

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present role since February 1996, and have been involved with the management of certain issues related to local interconnection, resale, and unbundling.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 29 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and

operations (including research and development) in both the domestic and international arenas.

I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina, in 1970, with an Associate of Applied Science in Business Administration degree. I later graduated from Georgia State University in 1992 with a Master of Business Administration degree.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC SERVICE COMMISSION, AND IF SO, BRIEFLY DESCRIBE THE SUBJECT OF YOUR TESTIMONY?

A. I have previously testified before the state Public Service Commissions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi and South Carolina, the Tennessee Regulatory Authority, and the Utilities Commission in North Carolina on the issues of technical capabilities of the switching and facilities network regarding the introduction of new service offerings, expanded calling areas, unbundling, and network interconnection.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED TODAY?

A. In my testimony, I will address the technical aspects of network related issues which have been raised in this docket. Those are, in whole or

in part, ITC^DeltaCom Issue Nos. 2, 2(b)(iv), 2(c)(i), 2(c)(ii), 2(c)(v), 2(c)(viii), 2(c)(xiv), 2(f) and 3(h).

Issue 3(b) Pursuant to the definition of parity, should BellSouth be required to provide the following: (1) Operational Support Systems ("OSS"), (2) UNEs, (3) White Page Listings, (4) Access to Numbering Resources, (5) An unbundled loop using Integrated Digital Loop Carrier (IDLC) technology, (6) Interconnection, (7) Service intervals on winbacks, (8) Priority guidelines for repair and maintenance and UNE provisioning, and (9) White Page listings to independent third party publishers?

Q. WHICH PARTS OF THIS ISSUE ARE YOU ADDRESSING?

A. My testimony will address sub-parts (4), (5), and (8). Sub-parts (1) and (3) are addressed in the testimony of Ron Pate. The definition of parity, as well as sub-part (2) are addressed in the testimony of Alphonso Varner. Sub-parts (6), (7), and (9) have been resolved.

Issue 3(b)(4): [ITC^DeltaCom No. 2] Pursuant to the definition of parity, should BellSouth be required to provide access to numbering resources?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth should not be required to provide access to numbering resources to ITC^DeltaCom as BellSouth is no longer the North American Numbering Plan Administrator ("NANPA"). The transition of responsibility from Bellsouth to Lockheed-Martin as NANPA began on July 6, 1998 and concluded on August 14, 1998 when Lockheed-Martin assumed full responsibility for number administration.

Issue 3(b)(5): [ITC^DeltaCom No. 2(a)(iv)] pursuant to the definition of parity, should BellSouth be required to provide unbundled loops using IDLC technology?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. To the extent technically feasible, BellSouth will make available integrated digital loop carrier ("IDLC") technology to ITC^DeltaCom. However, IDLC equipment allows the "integration" of loop facilities with switch facilities by eliminating equipment in the central office referred to as central office terminals or "COTs". Obviously, if an Alternative Local Exchange Carrier ("ALEC") wants to serve an end-user customer over the ALEC's own switch and that end-user customer was previously served over IDLC equipment, the loop can no longer be "integrated" with the BellSouth switch.

Q. IS THERE A FALSE ASSUMPTION THAT BELLSOUTH IS NOT PROVIDING PARITY UNDERLYING THIS ISSUE AS STATED?

A. **Yes.** The false assumption is that IDLC circuits are somehow engineered to provide a better level of service than non-IDLC circuits. BellSouth designs its network to meet particular transmission parameters for particular grades of service. For general customer use, BellSouth uses both IDLC and non-IDLC circuits to meet facility needs as they arise. If an end-user desires specific transmission parameters, then transmission devices may be used to increase or decrease gain over portions of the circuit or the entire circuit, whether served by IDLC or non-IDLC circuits, at an additional cost to the end-user. Similarly, in meeting facility needs for basic 2-wire UNEs, BellSouth draws from the same basic pool of facilities it uses for its retail users (indeed, in many cases, it is exactly the same facility). However, if the customer has been served by an IDLC facility, it may be necessary to switch the customer to a non-IDLC facility for the reasons described above. If ITC^DeltaCom's end-user needs specific transmission parameters for a given UNE not provided by the technical specifications of the basic 2-wire UNE, ITC^DeltaCom may order a different UNE that provides those parameters, or it may submit a Bona Fide Request ("BFR") for a UNE with those unique transmission parameters.

Issue 3(b)(8): [ITC^DeltaCom No. 2(b)(i)] Pursuant to the definition of parity, should BellSouth be required to provide priority guidelines for repair and maintenance and UNE provisioning?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. With regard to repair and maintenance guidelines, BellSouth should not be required to follow the same priority guidelines because BellSouth is not able to identify the ALEC's end-user. On UNE loops, BellSouth's records show only the name of the ALEC, not the name or any other end-user information about the ALEC's customer. Without that information, BellSouth simply does not have the capability to administer repair and maintenance priority guidelines for ALECs. However, the general restoration guidelines for UNE facilities approximate those that BellSouth uses for its retail customers. For example, a 2-wire UNE (2-wire analog voice grade loop non-designed (SL1)) has a 24-hour repair interval that is comparable to the 24-hour repair interval for a simple residence or business line. By contrast, an interoffice transport DS1 UNE has a 4-hour repair interval, which is comparable to the 4-hour repair interval for BellSouth's MegaLink service. In emergency restoration situations such as the total outage of a hospital, BellSouth will respond when notified by an ALEC in the same manner as if the hospital were served directly by BellSouth. Both the general repair guidelines and the emergency restoration procedures are set forth in the model Operational Understanding Between BellSouth Maintenance Centers and ALEC Maintenance Centers, which is available from BellSouth's ALEC Account Teams.

Provision of UNEs is not the same as provision of retail service. BellSouth does not provide UNEs to itself or to its retail customers. As such, UNE installation intervals are scheduled in accordance with BellSouth's Products & Services Interval Guide for Interconnection Services. This guide is available on the internet at http://www.interconnection.bellsouth.com/guides/intl_is2/indexf.htm.

Issue 10: [ITC^DeltaCom No. 2(b)(iv)] Should the parties be required to perform cooperative testing within two hours of a request from the other party?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. It is BellSouth's understanding that Issue 10 has been resolved; however, BellSouth reserves the right to file testimony on this issue, should it be further disputed.

Issue 11: [ITC^DeltaCom No. 2(c)(i)] Should BellSouth be required to provide NXX testing functionality to ITC^DeltaCom? If so, how?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth's position is that it should not be required to provide NXX testing functionality to ITC^DeltaCom.

Q. HAS BELLSOUTH PREVIOUSLY COMMUNICATED WITH ITC^DELTACOM ABOUT NXX TESTING FUNCTIONALITY?

A. Yes. In response to a request from ITC^DeltaCom in 1998, BellSouth considered this request and responded to it in a letter dated May 11, 1998, which contained the following points:

- First, BellSouth informed ITC^DeltaCom that it could accomplish the desired testing by installing a foreign exchange ("FX") line to the BellSouth offices in which ITC^DeltaCom wishes to conduct test calls. This suggestion was based on the fact that BellSouth itself utilizes FX lines to test its own switch provisioning.

- Second, BellSouth researched a proposal by ITC^DeltaCom to utilize a "software" fix that would provide remote call testing. BellSouth was informed by its switch suppliers that while the Northern Telecom DMS and the Siemens EWSD switches have such a capability, BellSouth's Lucent 5ESS switches are not equipped with the capability to provide such a feature. Because BellSouth's network architecture includes many 5ESS switches, BellSouth declined to provide the requested arrangement.

- Third, BellSouth informed ITC^DeltaCom that BellSouth had already responded to ALEC concerns about accurate and timely activation of all its NXX codes by establishing, effective May 15,

1998, an NXX activation Single Point of Contact ("SPOC"). Among other functions, the NXX SPOC coordinates the activation of ALEC NXX codes within BellSouth and provides a trouble-reporting center for ALEC code activation.

ITC^DeltaCom recently renewed its request for some kind of NXX testing functionality, and the request is currently undergoing a coordinated review by affected BellSouth workgroups. Should it be determined that the request can be granted, BellSouth will apprise ITC^DeltaCom of its findings and the related costs which would be involved.

It is not necessary that any decision regarding this matter be considered as mandatory by any regulatory body. BellSouth believes it has met its obligations under the 1996 Act and the FCC's rules by offering the FX line option discussed above because it is the same means by which BellSouth accomplishes NXX testing for its own purposes. Further, as a practical matter, BellSouth believes that the operation of the NXX SPOC has dramatically reduced, if not eliminated, the perceived need by ITC^DeltaCom to conduct its own NXX testing and verification. Since its establishment in mid-1998, the NXX SPOC has operated very successfully in keeping NXX activation problems to a minimum. The NXX SPOC provides ITC^DeltaCom with a positive report on the activation of all of ITC^DeltaCom's NXXs that are activated in BellSouth. A written response is provided to

ITC^DeltaCom when BellSouth's Complex Translations Group has provisioned the NPA/NXX in the appropriate BellSouth switches and BellSouth has completed mechanized Automatic Message Accounting ("AMA") testing and validation. Since it began operation, the NXX SPOC has tracked the provisioning and testing of approximately 1,700 NXXs for facility-based ALECs and Independent Telephone Companies and has been involved in the resolution of 121 customer related routing troubles.

Issue 12: [ITC^DeltaCom No. 2(c)(ii)] What should be the installation interval for the following loop cutovers:

(a) single

(b) multiple

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. The target time for a conversion interval is 15 minutes for a single loop cutover. This allows for setup and conversion time as discussed in detail below. Multiple loop cutover targets are based on this time interval, but recognize efficiencies achieved during multiple loop cutovers.

Q. WHAT ARE REASONABLE INTERVALS FOR MULTIPLE LOOP CUTOVERS?

A. Fifteen minutes is the time targeted for a single loop cutover for the reasons discussed in detail below. Thus, the baseline for a multiple loop cutover for ten (10) loops would be one hundred and fifty (150) minutes and for thirty (30) loops would be four hundred and fifty (450) minutes. As noted earlier, BellSouth recognizes that some efficiencies are achieved in a multiple loop cutover situation. Therefore, BellSouth is willing to agree to an interval of sixty (60) minutes for up to ten (10) loop conversions and one hundred and twenty (120) minutes for conversions involving no more than thirty (30) loops. These intervals are reasonable and have been accepted by one of the largest facilities-based ALECs in BellSouth's region.

Q. WHAT IS INVOLVED IN PERFORMING A LOOP CUTOVER?

A. I have provided Exhibit WKM-1 that shows, pictorially and with a brief narrative, the various work steps involved in a typical loop cutover. These photographs were taken in BellSouth's Norcross, Georgia, central office; however, the work steps are identical in all nine states in BellSouth's region. Briefly, the work steps involved are:

- The BellSouth central office technician receives a call to begin cutover and asks for the cable pair number of the loop to be cutover. This is shown on page 1 of Exhibit WKM-1.
- The technician types the cable pair number into a database to find the order number. This is shown on page 2 of Exhibit WKM-1.
- The technician retrieves a copy of the work order for the unbundled

loop. This is shown on page 3 of Exhibit WKM-1.

- The technician in the BellSouth central office responds to the BellSouth UNE Center's request to initiate the overall cutover of service from BellSouth to the ALEC. This is shown on page 4 of Exhibit WKM-1.
- The technician then verifies that the correct loop has been identified for cutover. This is done using a capability referred to as Automatic Number Announcement Circuit ("ANAC"). The technician plugs a test set onto the loop and dials a special code. The telephone number associated with that loop is played audibly. This is shown on page 5 of Exhibit WKM-1.
- Next, the technician locates existing jumper on the BellSouth Main Distributing Frame ("MDF") between the loop and the BellSouth switch. This is shown on pages 6-7 of Exhibit WKM-1.
- The technician locates and removes the end of the jumper connected to the BellSouth cable pair. This is shown on page 8 of Exhibit WKM-1.
- The technician then locates and removes the end of the jumper connected to the BellSouth switching equipment. This is shown on page 9 of Exhibit WKM-1.
- The technician then connects the first end of this new jumper between the loop and a connector block on a cable rack with tie cables to the ALEC's collocation arrangement. This is shown on page 10 of Exhibit WKM-1.
- The technician then weaves the new jumper wire through the cable

rack to reach the tie cables to the ALEC's collocation arrangement. This is shown on page 11 of Exhibit WKM-1.

- The technician connects the second end of the new jumper to the tie cable to the ALEC's collocation equipment. This is shown on page 12 of Exhibit WKM-1.
- The technician next verifies that the loop is connected to the expected switch port and telephone number in the ALEC's switch, again using ANAC capabilities. This is shown on page 13 of Exhibit WKM-1.
- Upon successful completion of the loop cutover, the technician verifies with the ALEC that the order was correctly worked, closes the order, and notifies the UNE Center. This is shown on page 14 of Exhibit WKM-1.

Naturally, any errors (both BellSouth's errors and the ALEC's errors) slow the process while corrections are identified and made. Thus, BellSouth should not be held responsible for delayed cutovers due to problems or errors caused by the ALEC. It is obvious from the many steps that have to be taken to correctly perform a loop cutover that the 15-minute timeframe appropriate for a single loop would not be a reasonable timeframe for a multiple loop cutover for a large end-user such as a major bank or manufacturing firm.

Q. IS BELLSOUTH IN TOTAL CONTROL OF THE LOOP CUTOVER PROCESS?

A. Absolutely not. As discussed above, loop cutovers require high levels of coordination between BellSouth and the ALEC to which the unbundled loop is being provided. If an ALEC fails to perform a function in a timely fashion, the delay directly impacts the overall cutover time. Therefore, any measurement of average loop cutover times will reflect not only the efficiency of BellSouth's systems and employees' skills, but also the efficiency of the ALEC's systems and employees' skills. For example, one step in the process occurs after the loop is removed from BellSouth's switch and is connected to the ALEC's switch. At this point in the cutover, tests are performed to verify that the loop is connected to the expected port in the ALEC's switch. However, if the ALEC has a defective switch port, or has provided an invalid switch port number, or any of a number of other possible errors occurs, BellSouth is powerless to move forward until the ALEC takes appropriate corrective steps. While the ALEC is doing so, the total cutover time clock is still running. Thus, while BellSouth strives to complete loop cutovers in as timely and effectively a manner as possible, BellSouth cannot be saddled with the entire responsibility for meeting the stated interval, especially given the ALEC's contribution to total cutover time.

Issue 15: [ITC^DeltaCom No. 2(c)(v)] Should BellSouth be required to designate specific UNE Center personnel for coordinating orders placed by ITC^DeltaCom?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth should not be required to designate specific UNE Center personnel for cutovers. The revised language proposed by ITC^DeltaCom Attachment 2 - 2.2.5 is arbitrary in its assessment of how many personnel may be required to conduct a cutover. BellSouth carefully monitors total workload results and forecasts future workload requirements and the personnel needed to meet those requirements based on historic trends, business forecasts, and the experience of local managers. BellSouth assigns work activity in the most efficient manner to complete all functions, including work functions for all ALECs. Any deviations from this process, such as attempting to dedicate specific people to particular ALEC projects, would increase costs without necessarily providing any improvement in cutover performance. BellSouth incurs significant costs in connection with providing personnel to handle all ALEC orders for services and UNEs; therefore, it is critical that BellSouth retain the flexibility needed to meet its service and contractual obligations without any requirement to dedicate specific personnel to particular functions.

Issue 17: [ITC^DeltaCom No. 2(c)(viii)] Should BellSouth be responsible for maintenance to HDSL and ADSL compatible loops provided to ITC^DeltaCom?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth has not received sufficient documentation from ITC^DeltaCom about this issue to enable BellSouth to provide a definitive response at this time. However, if BellSouth provides the HDSL and ADSL facilities, BellSouth will provide maintenance and repair of the facilities in accordance with the terms of the tariff (ADSL services) or interconnection agreement (HDSL/ADSL compatible loops) under which they are offered. ITC^DeltaCom loop modifications are not offered as a UNE.

BellSouth does not provide HDSL and ADSL "facilities" as UNEs to ITC^DeltaCom or to any other ALEC. BellSouth does, however, provide a federally tariffed wholesale ADSL service to certain wholesale customers. BellSouth's ADSL wholesale service is a separate and distinct offering from an ADSL or HDSL *compatible* loop. The latter is offered as a unique network capability on a UNE basis to ALECs via the service inquiry process.

Q. HOW DOES THE ADSL COMPATIBLE LOOP DIFFER FROM THE TARIFFED ADSL SERVICE?

A. BellSouth's ADSL tariffed service does not normally involve installation of a new physical facility to the customer's premises because the ADSL service actually uses the customer's existing local service

facility. Unless the Network Interface Device ("NID") needs to be replaced, ADSL tariff service does not generally require a premises visit by BellSouth. On the other hand, the ADSL compatible loop offering always requires a designed physical loop facility and requires dispatch of a BellSouth technician to the customer's premises. In addition, the ADSL compatible loop requires a service inquiry, design engineering, and connection and testing activities.

Q. WHAT ARE THE IMPLICATIONS OF THESE DIFFERENCES FOR MAINTENANCE AND REPAIR RESPONSIBILITIES?

A. With respect to maintenance and repair, if BellSouth is providing its HDSL or ADSL wholesale tariffed service, the maintenance and repair are offered as part of such wholesale service. On the other hand, if BellSouth is providing a loop that has been modified from its original technical standards at the request of ITC^DeltaCom, then BellSouth can not guarantee that the modified loop will meet the technical standards of a non-modified loop.

Issue 20: [ITC^DeltaCom No. 2(c)(xiv)] (a) Should BellSouth be required to coordinate with ITC^DeltaCom 48 hours prior to the due date of a UNE conversion? (b) If BellSouth delays the scheduled cutover date, should BellSouth be required to waive the applicable non-recurring charges? (c) Should BellSouth be required to perform dial tone tests at least 48 hours prior to the scheduled cutover date?

Q. WHICH PARTS OF THIS ISSUE ARE YOU ADDRESSING?

A. My testimony addresses sub-parts (a) and (c). Sub-part (b) is addressed in the testimony of Mr. Alphonso Varner.

Issue 20(a): [ITC^DeltaCom No. 2(c)(xiv)] Should BellSouth be required to coordinate with ITC^DeltaCom 48 hours prior to the due date of a UNE conversion?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. With regard to sub-part (a), BellSouth opposes the 48-hour requirement for all UNEs as set forth in ITC^DeltaCom's proposed language at Att. 4.9.1 as the language is too broad. For example, the language would include SL1 loops that are not normally subject to coordination. Further, with regard to SL2 loops only, BellSouth agrees that it will exert its best efforts to schedule a conversion date and time 24 to 48 hours prior to a conversion.

Issue 20(c): [ITC^DeltaCom No. 2(c)(xiv)] Should BellSouth be required to perform dial tone tests at least 48 hours prior to the scheduled cutover date?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. With regard to sub-part (c), BellSouth's understanding is that what ITC^DeltaCom apparently wants is for a BellSouth technician to verify ITC^DeltaCom's facilities between BellSouth's central office and ITC^DeltaCom's central office are in working order. Further, ITC^DeltaCom wants BellSouth to use the ANAC functionality to verify that ITC^DeltaCom's order is correct and that the assigned ITC^DeltaCom switch port has dialtone.

While BellSouth understands the basis for ITC^DeltaCom's request, these are extra measures that in many cases do no more than perform certain testing "up front" in order to allow ITC^DeltaCom to correct its own mistakes. BellSouth is working with ITC^DeltaCom to arrive at a workable solution to ITC^DeltaCom's request.

Issue 21: [ITC^DeltaCom No. 2(f)] Should BellSouth be required to establish Local Number Portability (LNP) cutover procedures under which BellSouth must confirm with ITC^DeltaCom that every port subject to a disconnect order is worked at one time?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. ITC^DeltaCom has included new timeframes in the proposed interconnection agreement language that Bellsouth must still review before it can fully respond. BellSouth, however, does agree that coordination between itself and ITC^DeltaCom is extremely important

for LNP order cutovers. Additionally, BellSouth already has LNP cutover procedures in place.

Issue 29: [ITC^DeltaCom No. 3(h)] If ITC^DeltaCom needs to reconnect service following an order for a disconnect, should BellSouth be required to reconnect service within 48 hours?

Q WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth should not be required to maintain facilities for any set period of time once a service has been disconnected. As a practical matter, once a UNE facility has been disconnected for any reason, that facility is subject to immediate reuse. In an area experiencing a shortage of facilities, it would not be unusual for a facility used by an ALEC or by a BellSouth retail unit to be reassigned within minutes in order to complete a local service request ("LSR") for an ALEC or a service order for a BellSouth retail end-user customer. Therefore, while BellSouth will exert its best efforts to reconnect facilities in unusual situations as expeditiously as possible, BellSouth can not commit to reconnect service after disconnection. It should be pointed out that the ALEC shares the responsibility to conduct appropriate tests prior to any cutover activity, thus avoiding any need to reconnect a service.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. **Yes.**

LOOP CUTOVER PROCESS

Step 1: Technician gets call to begin cutover.
Asks for cable pair information.

LOOP CUTOVER PROCESS

Step 2: Technician types in cable pair number to obtain order number.

LOOP CUTOVER PROCESS

Step 3: Technician retrieves copy of work order.

LOOP CUTOVER PROCESS

Step 4: Technician responds to UNE Center request to initiate overall cutover of service from BellSouth to CLP.

LOOP CUTOVER PROCESS

Step 5: Technician conducts ANAC test to verify that correct loop is being cutover.

LOOP CUTOVER PROCESS

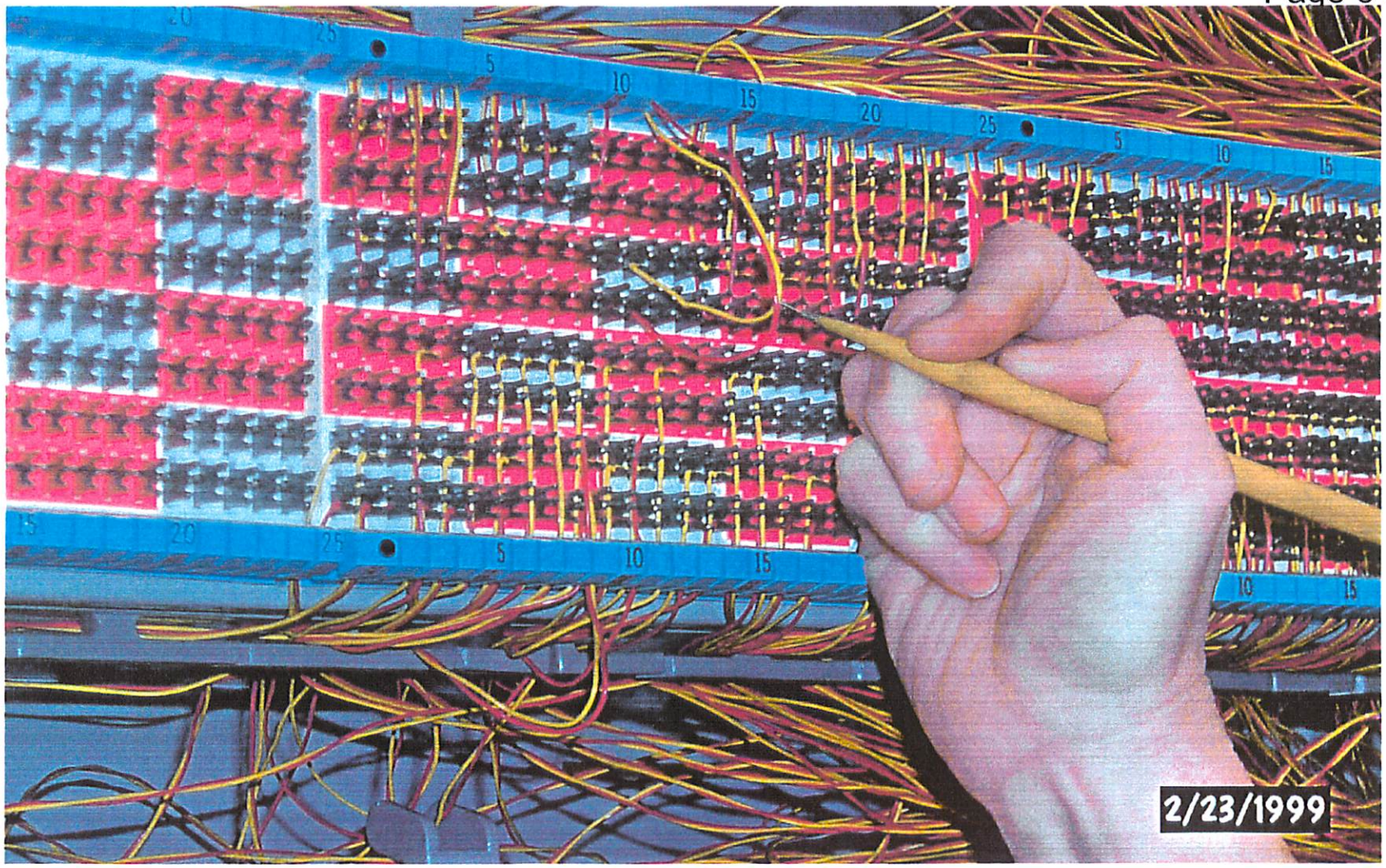
Step 6: Technician walks along Main Distributing Frame to locate both ends of jumper to be cut.

LOOP CUTOVER PROCESS

Step 7: Technician locates precise location of jumper.

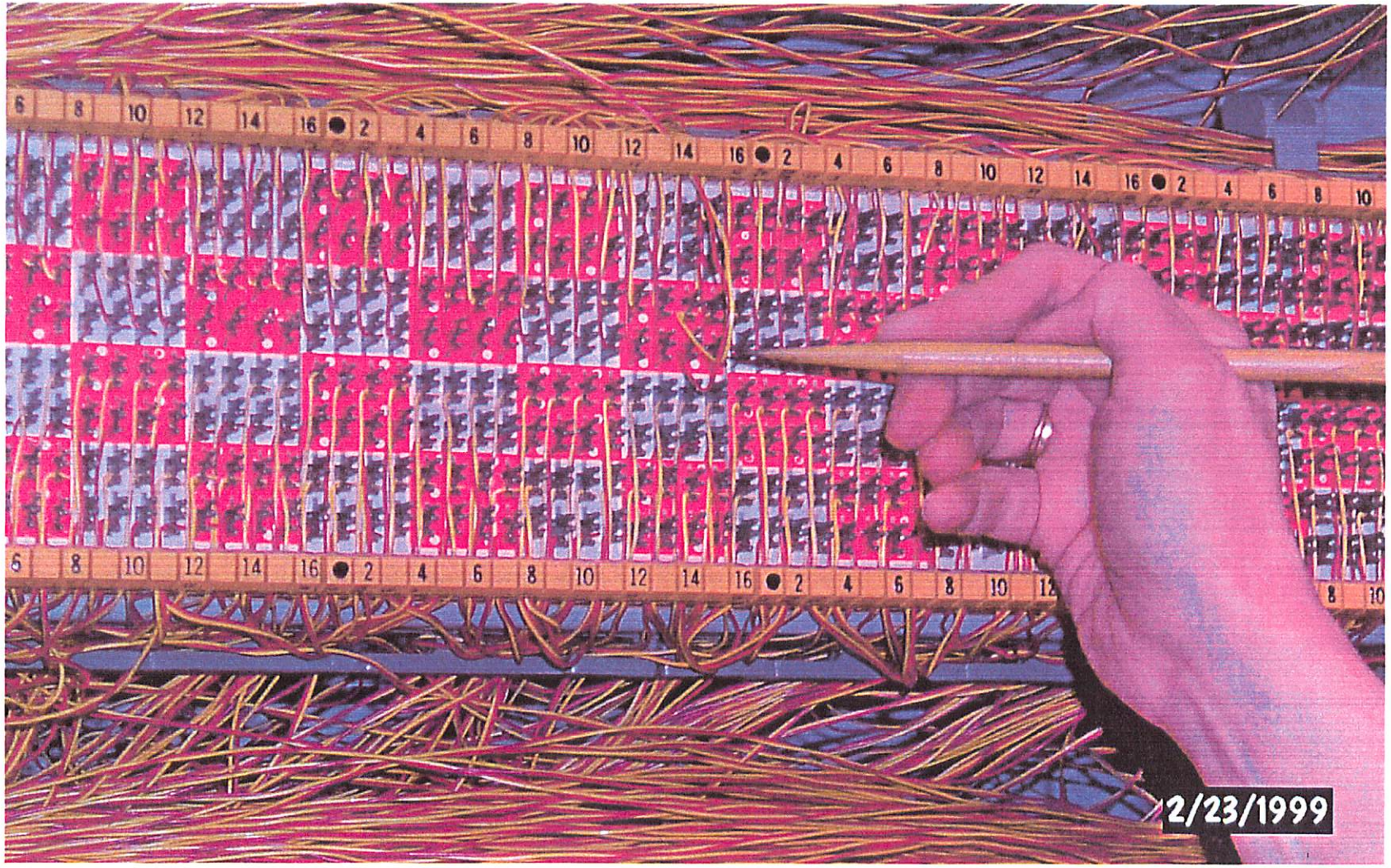
LOOP CUTOVER PROCESS

Step 8: Technician locates and removes end of jumper connected to the BellSouth cable pair.



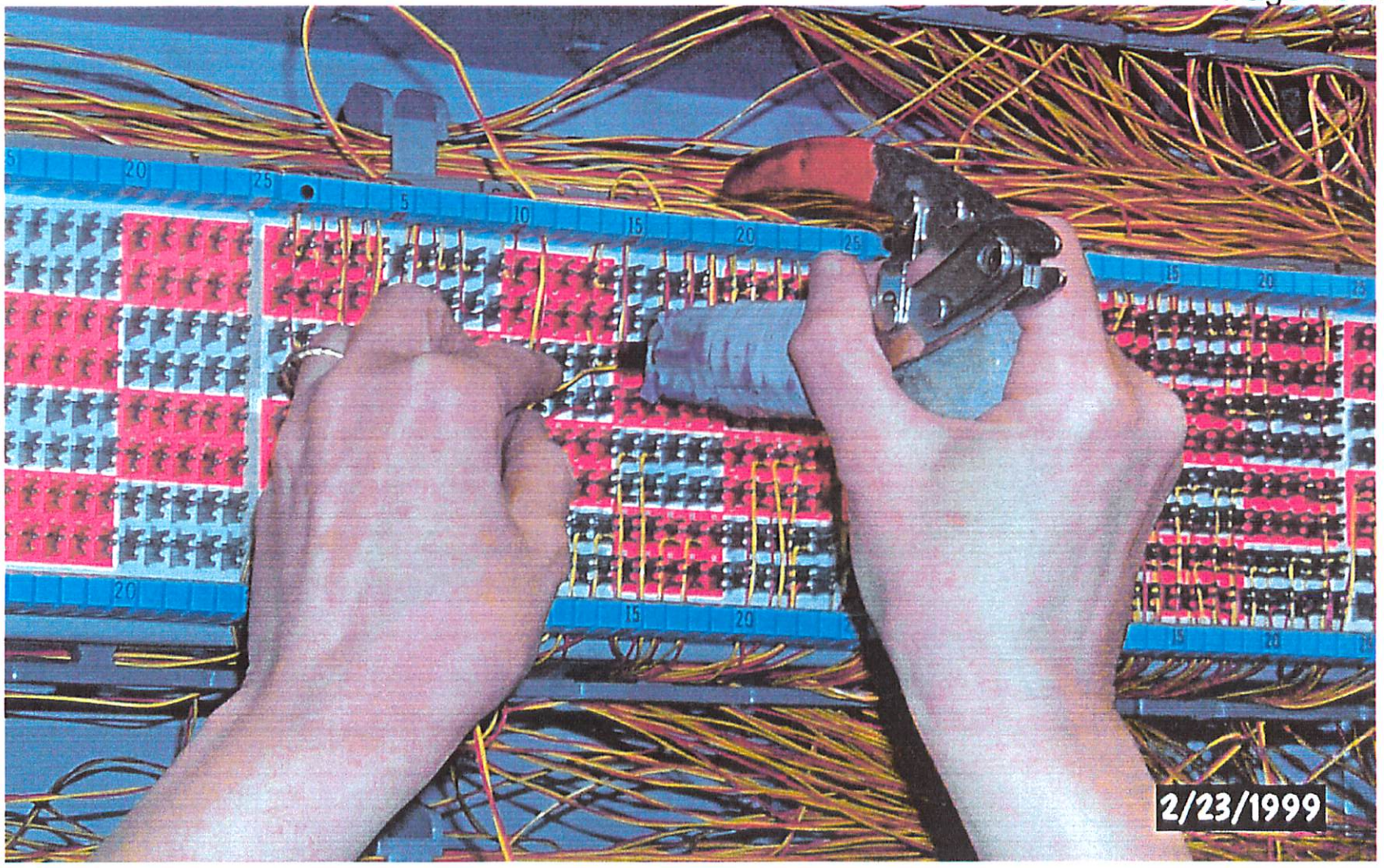
LOOP CUTOVER PROCESS

Step 9: Technician locates and removes end of jumper connected to the switching equipment.



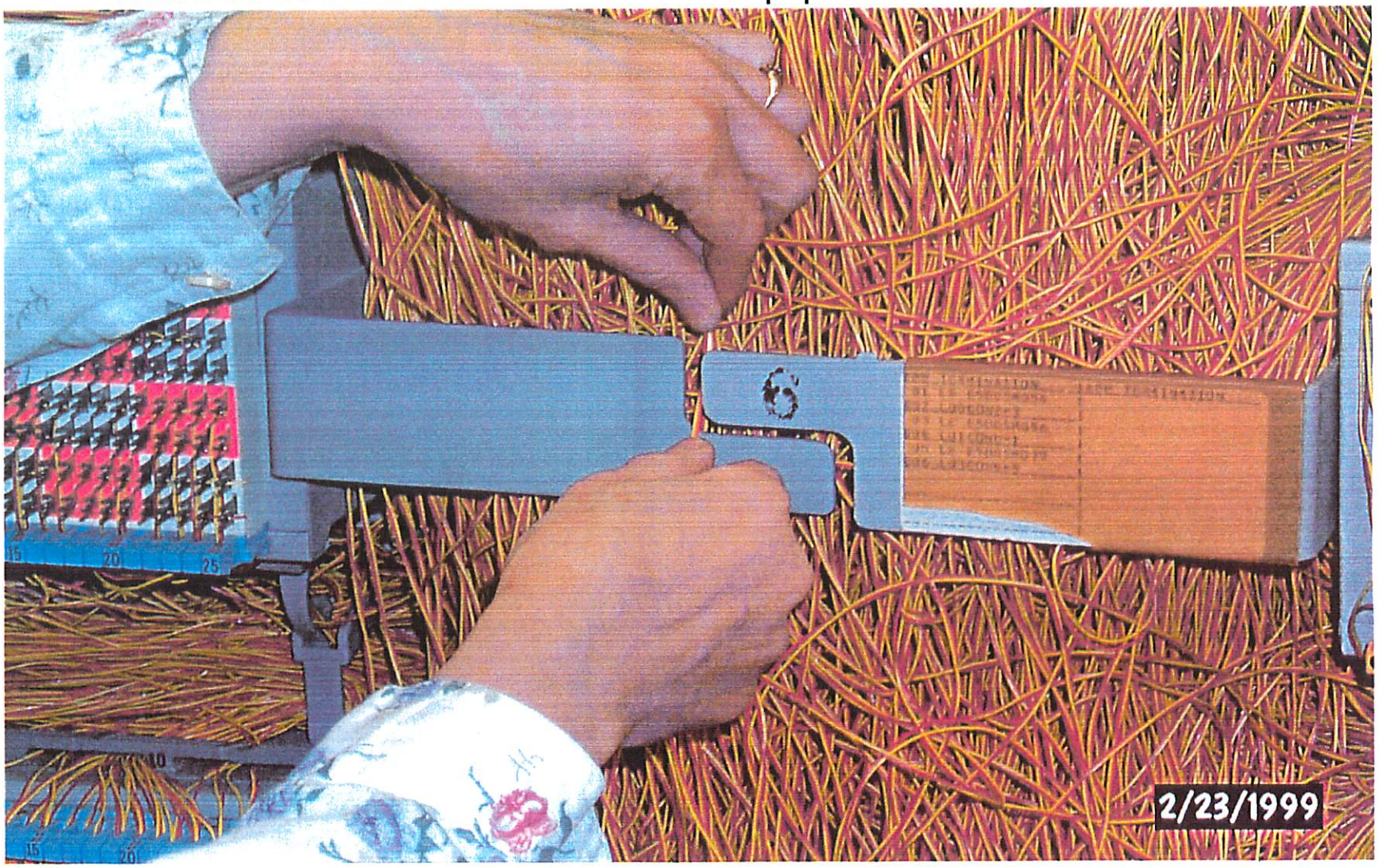
LOOP CUTOVER PROCESS

Step 10: Technician places new jumper on MDF.



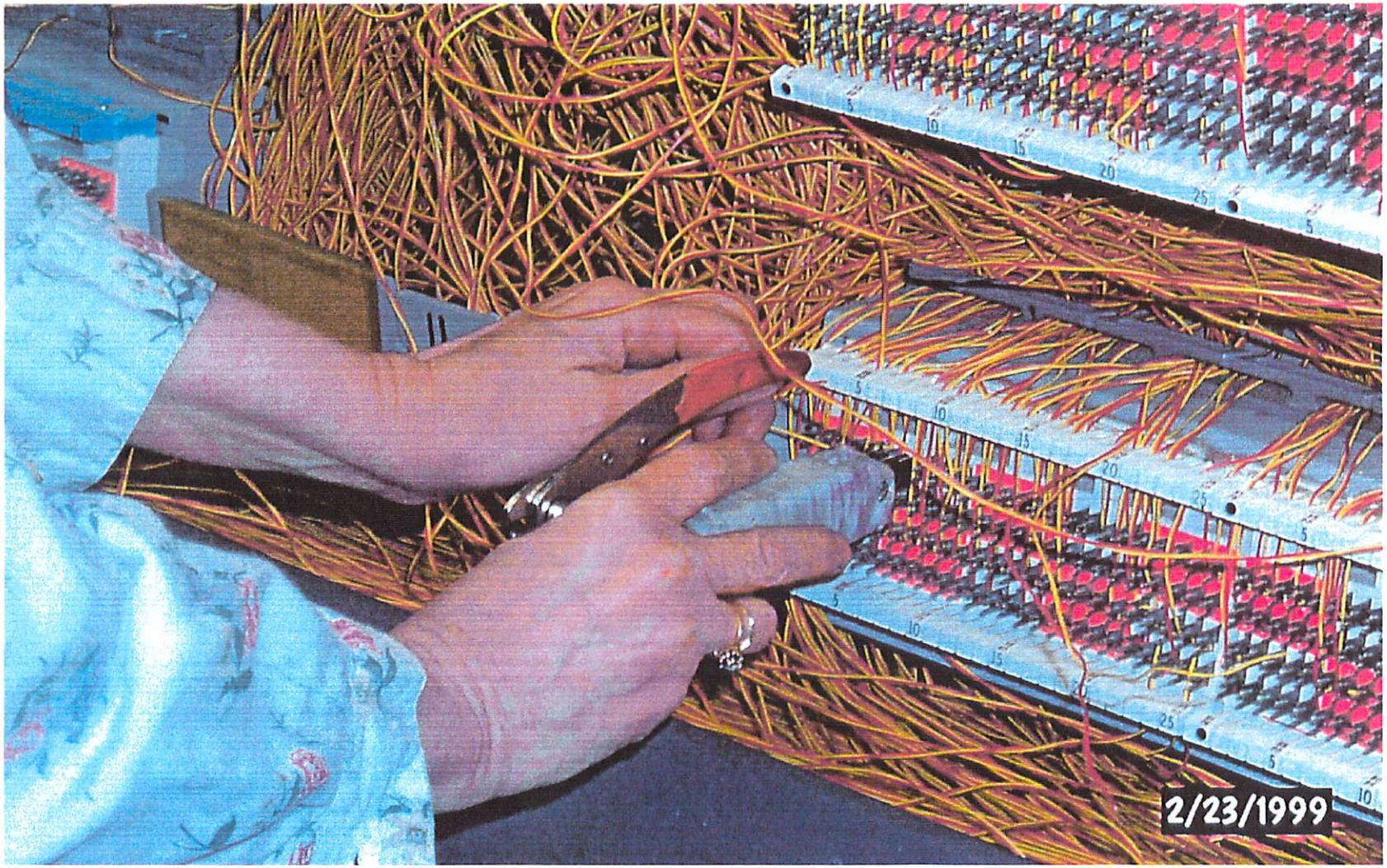
LOOP CUTOVER PROCESS

Step 11: Technician weaves wire through cable rack to reach tie cable to CLP's collocation equipment.



LOOP CUTOVER PROCESS

Step 12: Technician connects new jumper on frame to tie cables to CLP equipment.



LOOP CUTOVER PROCESS

Step 13: Technician conducts ANAC test to verify that loop has been cut to correct CLP switch port.

LOOP CUTOVER PROCESS

Step 14: Technician verifies cutover with CLP, closes order, and notifies the UNE Center.