



Rhonda P. Merritt
Assistant Vice President
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June 1, 1999

Mr. Victor Cordiano
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

DECLASSIFIED

See DN 03565-00

000012-TL

RE: Response to Your Letter of April 14, 1999, to Mr. Kenneth A. Hoffman at TCG South Florida

Dear Mr. Cordiano:

I have received your letters of April 14 and April 30, 1999, regarding the complaints filed by Axiss Advertising, Inc. (AAI) (complaint no. 251683I) and Mr. Robert Borello (complaint numbers 243544I/240544I/252796I). TCG/AT&T has conducted an internal investigation regarding these complaints, as well as the additional complaints mentioned in Mr. Borello's letter to the Florida PSC.

TCG/AT&T's responses to the questions in your letter of April 14 are as follows:

1. TCG/AT&T fully complied with Rule 25-4.118 F.A.C. in all cases. Of the complaints included in your letter, only AAI alleged an unauthorized carrier change. TCG/AT&T had authorization from AAI to switch carriers, as shown in the attached copy of a letter of authorization signed by Ms. Lexi Segre, President of AAI.
2. The agreement between TCG and BellSouth does not specifically contain the language to which you refer in your letter. However, the nature of a contract is such that each company is required to comply with its contractual obligations, and we believe it is the expectation of both parties that neither will engage in willful or intentional misconduct, gross negligence, or act in an unlawful manner.

DOCUMENT NUMBER-DATE

11878 OCT-1 8

FPSC-RECORDS/REPORTING

3. TCG/AT&T believes that whenever a customer is not properly cut over to TCG/AT&T's local service, it has not fully satisfied its obligation to that customer, whether the "fault" lies with BellSouth, TCG/AT&T, a combination, or neither. While there has been no "willful" or "gross negligence" on the part of TCG/AT&T, and TCG/AT&T is aware of no such behavior by BellSouth, there is evidence that the coordinated "hot cut" process between the companies is inadequate to meet customer and business needs.

4. TCG/AT&T engaged in no willful or intentional misconduct, gross negligence, or acted in an unlawful manner, and does not allege that BellSouth engaged in such behavior in connection with any complaint.

5. Any time a customer is without telephone service for an extended period of time, TCG/AT&T believes the customer received inadequate service. Clearly, the service provided by BellSouth to TCG/AT&T was inadequate in that it failed to meet TCG/AT&T's business needs.

6. TCG/AT&T did not express negative comments about BellSouth and is not aware of any negative comments made by BellSouth.

7.

AAI (251683I):

December 30, 1998 TCG/AT&T requested a due date of January 12, 1999 for this customer.

January 15, 1999 TCG/AT&T received a firm order commitment (FOC) from BellSouth showing a due date of that same day. Since the FOC was not received until after the requested due date and on the same day as the due date proposed by BellSouth, service could not be turned up and a new due date of January 29 was requested from BellSouth.

January 26, 1999 FOC received for January 29 due date.

January 27, 1999 A TCG/AT&T representative spoke with the customer to confirm service transfer that day. The customer indicated that since the process was taking so long, she wished to cancel her order. Accordingly, TCG/AT&T sent a cancellation notice to BellSouth on January 27.

February 17, 1999 TCG/AT&T received a message from the customer that she had no service. We believe that the customer first called BellSouth and was directed to call us. TCG/AT&T contacted a BellSouth representative, who stated that the order had been cancelled in their system on January 16. TCG/AT&T cannot explain this date, since the order was cancelled on January 27, but whether the order was cancelled on January 16 or January 27, the customer's service was never switched to TCG/AT&T.

BellSouth instructed TCG/AT&T to advise the customer to call 611 to report a BellSouth service outage, which was passed on to the customer. Later on February 17 the customer again telephoned TCG/AT&T reporting that BellSouth said they could not help her since TCG/AT&T "had ownership of her lines". From February 17 through February 18, there were multiple calls between TCG/AT&T, BellSouth, and the customer.

February 18 At 3:47 p.m. the customer reported that her service was restored.

This customer's number was never ported to TCG/AT&T, and TCG/AT&T cancelled this order well before the service outage. It appears that BellSouth's internal records either were incorrect or not up to date when BellSouth incorrectly directed the customer to TCG/AT&T. It is clear, however, that BellSouth's inability to timely return FOCs contributed to the incident.

Mr. Roger Borello (243544I/240544I/252796I):

December 5, 1998 TCG/AT&T submitted three local service requests (LSRs) to BellSouth (one for each of three telephone numbers) requesting a December 18 due date.

December 8, 1998 Received FOC for December 18, 1999.

December 18, 1998 TCG/AT&T delayed the order due to the need for additional technical clarification of cable ID and pairs, and requested a new due date of January 6, 1999.

December 21, 1998 BellSouth advised that the order had been sent to "clarification" on December 20.

December 29, 1998 BellSouth rejected the December 18th LSRs and requested that TCG/AT&T resubmit the order on one LSR instead of three as previously submitted.

December 30, 1998 TCG/AT&T resubmitted the order on one LSR as requested and requested a due date of January 4, 1999.

January 6, 1999 No FOC had been received from BellSouth for the January 4th ,due date, so TCG/AT&T requested the due date be moved to January 13, 1999.

January 13, 1999 BellSouth rejected the order saying they needed one LSR, not three.

January 14, 1999 TCG/AT&T clarified to BellSouth that one LSR had already been submitted on December 30. Also on January 14, TCG/AT&T received a FOC with a due date of the previous day, January 13. Later on January 14, the customer reported to both TCG/AT&T and BellSouth that his numbers were not working. It appears that BellSouth worked this order before it sent the FOC.

January 15, 1999 BellSouth reported to TCG/AT&T that the customer wished to cancel his order. TCG/AT&T confirmed directly with the customer on January 15 that indeed he wanted to cancel his order. TCG/AT&T cancelled this order directly with BellSouth via a 3-way conference call.

February 3, 1999 The customer again reported that he was out of service and that BellSouth instructed him to telephone TCG/AT&T. TCG/AT&T had cancelled the customer's order on January 15, 1999 and therefore believes that the customer's February 3rd service outage is unrelated, but generated cancellation paperwork on February 3 to confirm the verbal discussions with BellSouth on January 15. The customer's service subsequently was restored by BellSouth.

STS Electronics (242218R)

December 29, 1998 TCG/AT&T sent order to BellSouth with January 12, 1999 requested due date.

January 12, 1999 No FOC or reject notice was received, so order was re-sent, requesting January 14, 1999 due date.

January 14, 1999 No FOC or reject notice was received, so order was re-sent with January 18, 1999 due date; also updated customer contact information.

January 15, 1999 Received FOC with January 26, 1999 due date.

January 18, 1999 Spoke with customer to confirm January 26 due date

January 26, 1999 Ported original order, tested and confirmed all ported numbers working but one; one line not ported due to incorrect identification of cable and pair assignment by TCG/AT&T; order with corrected cable and pair information sent to BellSouth with requested due date of February 9, 1999 for that line. On this date TCG/AT&T also became aware that the customer had a fourth number to add to the order which would have to be submitted on a separate order.

January 27, 1999 BellSouth reported that customer wished to return to BellSouth. TCG/AT&T telephoned customer who reported they did not want to return to BellSouth at that point, but were experiencing delayed dial tone with their credit card machine and would have no choice unless it could be fixed. Trouble ticket opened with BellSouth.

January 29, 1999 Customer reports no dial tone on one line but records do not reflect the line number. Trouble ticket opened with BellSouth.

January 29, 1999 BellSouth reported that no dial tone was being received from TCG/AT&T at BellSouth switch. TCG/AT&T technician dispatched to collocation facility.

January 29, 1999 Conference call between TCG/AT&T, BellSouth, and customer; customer reported considering returning to BellSouth.

January 29, 1999 Customer confirmed dial tone later that day.

February 1, 1999 Customer called TCG/AT&T and requests immediate return to BellSouth. At this point, one of the three original lines still had not been ported, nor had the additional line that was added late in the order process.

February 2, 1999 TCG/AT&T contacted customer, who reported that they had instructed BellSouth the return all lines to BellSouth; customer refused to have further conversations with TCG/AT&T.

February 6, 1999 Confirmed that customer had returned to BellSouth and closed trouble ticket.

Other Customers: Mr. Borello mentioned three additional customers in his letter who also had complaints about TCG/AT&T's service. It does not appear that these three customers filed complaints at the Florida PSC, so TCG/AT&T does not have the consent of these customer to release information about their account. We therefore have not included them in this response. If the Florida PSC wishes TCG/AT&T to provide information on these accounts, we must claim confidentiality for the response.

8. Please see No. 7, above, for information regarding notification to BellSouth and end users of various events related to service cutovers. TCG/AT&T submits by facsimile all orders, change orders, and cancellations to BellSouth and receives FOCs, LSRs and other documents by fax. TCG/AT&T also coordinates all dates with customers via telephone calls.

9. TCG/AT&T believes the root cause of these service outages is the insufficiency of BellSouth's operational support systems and the resulting need for manual ordering and processing. Also, as mentioned earlier, there remains considerable work to be done to improve the coordinated "hot cut" process. TCG/AT&T has proposed several process improvements which we believe will result in improved customer experiences with local carrier changes. We will continue to work diligently with BellSouth on improving these processes.

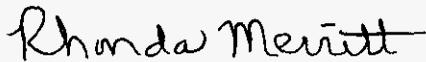
10. These incidents involved total service outages, and thus are no different than any other service outages. That is, there was no independent 911/E911 inaccessibility in any of these cases.

11. TCG/AT&T does not feel it is liable for damages or costs associated with these customer experiences. Since these customers were not billed for TCG/AT&T service, no credit is due.

12. See response to (11) above.

All of the customers above have returned to BellSouth for their local service. We regret the unpleasant experience they had while trying to change local carriers and believe that the development of trustworthy and functional electronic OSS will be the ultimate solution to avoiding problems like this in the future. We request that these complaints be closed in the Florida PSC system, and we look forward to working with the FPSC as BellSouth's OSS systems are tested and improved for the competitive future experience of Florida's consumers.

Sincerely,


Rhonda P. Merritt

OTHER FORM

Circle One

Long Distance Main Billing Phone Number (305) 447 9300

Switch to AT&T and we'll credit you \$5 per line.

Company Name Axiss Advertising Inc.

Address 2100 Ponce de Leon Blvd. Suite 1070

City/State/Zip Coral Gables, FL 33134

Contact Lexi Sagre

Title Owner

Contact # (305) 447-9300

AT&T Account # _____

I. Local Service

Business Phone Number (305) 447 9300

WTN'S (305) 447-1598

WTN'S (305) 447-1936

WTN'S (305) 447-3150

WTN'S (305) 447-6578

WTN'S (305) 447-6633

WTN'S (305) 447 6838

WTN'S () _____

Calling Card(s) (MAXIMUM - 4 TOTAL)
International access Y/N 1 2 3 4

LINE	THRU	EXISTING/NEW	ROUTING Y/N	HUNTARY	MARKING Y/N	TYPE OF BILLING	ADT CODES Y/N	FORWARD Y/N	3 WAY CALLING Y/N	STRETCH Y/N	CALL FORWARD NUMBER Y/N	CALL FORWARD BIRTH Y/N	CALL FORWARD BIRTH NUMBER Y/N	CALL WAITING/RECALL Y/N	MINUTE NUMBERS	PACKAGE 1	PACKAGE 2	PACKAGE 3	PACKAGE 4	
X		E	Y	Y		Y														X
X		E	2	Y		Y														
X		E		Y																
X		E	3	Y		Y														
X		E	4	Y		Y														
X		E	5	Y		Y														
X		E	6	Y		Y														

\$1-\$1000 Avg. Monthly Billing \$ 300
 Current Term Plan Y N
 AT&T Rep Y N
 Current Provider ID AT&T Estate / Held / O
 Local Toll B. 115 South

B. Local Toll (Intralata) Service (305) 447-9300

Switch to AT&T and we'll credit you \$5 per line.

SWITCH ALL #S LISTED IN SECTION I.

WTN'S (305) 447 1598 (305) 447-1936 (305) 447-3150

(305) 447 6578 (305) 447-6633 (305) 447 6838

C. Toll-Free - POTS Line () Published Non-Published

Existing () ()

AT&T Winback Response Form Attached

New
 First Available Toll-Free # Vanity Request

Toll-Free # () Reservation # _____

Toll-Free # () Reservation # _____ AUG 14 1998

*Toll-Free Payphone Surcharge - Restricted Yes No

With the selection of "no" you agree to pay for a surcharge when your Toll-Free # is called from a payphone.

Local Directory Listing

Non Listed: Y/N

Non Published: Y/N

Yellow Pages: Y/N

White Pages: Y/N

Heading: Advertising Agency

Call Back Time and Date

How would you like to be contacted with the local order status?

Phone (305) 447 9300

FAX # _____

E-Mail Address: _____

Day/Evening _____

2100 Ponce de Leon Blvd
Suite 1070
Coral Gables, FL 33134
Ph: (305) 447-9300
Fax: (305) 447-1936
e-mail: lex@axiss.com
www.axiss.com



Lexi Sagre

For Advertising or Graphic Design & more

The Customer identified above has authorized AT&T to act as its agent to switch customer's current service provider to AT&T for interexchange service or toll-free (800/800) service if box "B" is checked and/or local service if box "C" is checked. Customer understands that such a switch may involve a charge by customer's current service provider. I also hereby revoke any appointments of authority that I have given to any other Long Distance and/or Local Service Provider prior to this date.

Customer Signature Lexi Sagre

Agent Signature Jonathan Fielder

Agent ID FLA458 Date 8/11/98

For questions about this order, please call 1-800-286-8308

FLA 00606



Rhonda P. Merritt
Assistant Vice President
Law & Government Affairs

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101 N. Monroe St.
Tallahassee, FL 32301
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July 30, 1999

RECEIVED

JUL 30 1999

CMU

Mr. Victor Cordiano
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: Response to Your Letter of June 29, 1999

Dear Mr. Cordiano:

000012-TL

TCG/AT&T's responses to the questions in your letter of June 29 are as follows. These responses apply to all three complaints cited in your letter.

A. TCG/AT&T believes that whenever a customer is not properly cut over to TCG/AT&T's local service, the processes between BellSouth and TCG/AT&T are inadequate to meet our customer and business needs.

(1) TCG/AT&T has recently assigned a dedicated resource to work on the "hot cut" processes between our companies. Additionally, TCG/AT&T has documented its concerns and made specific suggestions to BellSouth on how to improve these processes in our letters to BellSouth dated April 12, 1999 (Tab 1), June 16, 1999 (Tab 2), and July 14, 1999 (Tab 3). TCG/AT&T also has recently sent diagrams to BellSouth to document the Coordinated Hot Cut Process (Tab 4).

B. The requested matrix is attached (Tab 5).

C. We are unable to respond to this question due to the length of time that has passed since these orders were originally submitted to BellSouth.

D. (1) While the BST/TCG agreement contains no language about firm order confirmation intervals, the BellSouth Interval Guide, which is available via the BellSouth web site, shows interval times which ALECs should expect. This Interval Guide can be viewed at: www.interconnection.bellsouth.com/guides/intl_is2/index.htm. As you may know, this issue is of great concern to ALECs, who must have reliable and timely firm order confirmation notices in order reliably to provision service to customers.

(2) The BST/TCG agreement contains no language about error notification interval times. It has been TCG/AT&T's experience that clarification notices are being received at various times, even after firm order confirmations have been received. Firm order confirmations by their nature should indicate that the order is final and ready for processing; however, receipt of a clarification notice after receipt of a firm order confirmation indicates that there are still outstanding issues, so it becomes questionable that a firm order confirmation is a valid and reliable document. Again, this issue has been of considerable concern to the ALEC community.

E. Refer to the letters referenced in (A.1) above. The service provided by BellSouth to TCG/AT&T was inadequate in that it failed to meet TCG/AT&T's customer and business needs.

F. It is TCG/AT&T's understanding that when an order is cancelled by an ALEC, BellSouth must cancel the order in three of its internal systems. This may be the source of some of the confusion regarding cancellations. However, TCG/AT&T has no control over BellSouth's internal systems and must rely on BellSouth to cancel orders properly within their own systems.

(1) There is no provision in the BST/TCG agreement that BST must confirm cancellations in writing. BellSouth has recently verbally agreed to provide firm order confirmations when orders are cancelled, but TCG/AT&T has no experience thus far on the adequacy of this process or if it will result in improvements in BellSouth's handling of cancellations.

(2) There is no provision in the BST/TCG agreement that BST must confirm cancellations orally via a 3-way audio-recorded conference call.

G. Refer to the letters referenced in (A.1) above. The service provided by BellSouth to TCG/AT&T was inadequate in that it failed to meet TCG/AT&T's customer and business needs.

H. Refer to the letters referenced in (A.1) above.

Sincerely,

Rhonda Merritt

Rhonda P. Merritt

①

April 12, 1999

Mr. Charles Coe
President
BellSouth Telecommunications, Inc.
Suite 4500
675 W. Peachtree Street
Atlanta, Georgia 30375

Re: UNE Loop Orders

Dear Charlie:

I write this letter to request your personal involvement in ensuring that BellSouth promptly implements the necessary processes and system capabilities throughout its service area to enable the ordering and provisioning of UNE loops for AT&T at commercial volumes without service disruption to AT&T customers. While there are several open issues which our teams are working to resolve, I wanted to bring to your attention one of the more critical items.

AT&T believes it is critical that we establish with BellSouth explicitly defined and agreed upon processes and procedures for all phases of this service, from order entry through provisioning, with particular emphasis on performing "coordinated hot cuts" -- the process of cross-connecting a customer's unbundled loop to AT&T's switch and simultaneously porting the customer's local telephone number. Experience has shown that the failure to have adequate coordinated hot cut processes in place can lead to service disruptions for customers that are seeking to leave the incumbent LEC for a competitive local carrier such as AT&T. Such a situation, which is unheard of in the highly competitive long distance market, is intolerable for AT&T and its customers, and inhibits competition for facilities-based local service. Failure to have appropriate, explicitly defined processes in place can also lead to wasteful and inefficient use of resources for both AT&T and BellSouth.

As you may be aware, AT&T end user customers in BellSouth territory have experienced outages as a result of flaws in the coordinated hot cut procedures. AT&T plans to ramp up substantially the volume of UNE loop orders in BellSouth territory in the next few months, as soon as we gain assurances that in attempting to do so we will

not be putting customers out of service. Therefore, your commitment is needed to work collaboratively with AT&T to fully document and implement the necessary procedures to ensure that AT&T can meet this schedule and place orders at commercial volumes with no service disruption to our customers. Based on the discussions and experience of our teams to date, key process improvements BellSouth needs to implement include (but are not limited to) the following:

1. BellSouth and AT&T must have a clear and agreed upon understanding of the process flow supporting coordinated hot cuts, from due date minus 48 hours through the customer installation, test and turn-up. Although BellSouth currently has a process flow defined, there are customers who experience significant downtime at the time of cut. It is imperative that BellSouth and AT&T isolate and remedy any gaps or flaws in this process.
2. Forty-eight hours prior to installation, BellSouth must test for AT&T pre-provisioned dial tone and ANI. Additionally, BellSouth must test to insure that the customer's ANI matches the one noted on the AT&T order.
3. BellSouth and AT&T must develop an agreed-upon process for notification of loop cutover completion that includes a viable means of testing and acceptance, as well as appropriate timeframes for all acceptance activities.
4. BellSouth must improve its process for giving status and detail to AT&T regarding customer outages or trouble tickets associated with coordinated hot cuts. AT&T must have regular, real-time status in order to advise customers of repair activities and projected restoration of service.
5. BellSouth must develop a process that will insure temporary, emergency service restoration back to BellSouth in one hour in the event that a hot cut goes bad.
6. BellSouth and AT&T must develop and agree upon a change control process that will govern the information required for local services requests. Part of this change control process must be a method of timely, proactive notification of changes in requirements. Postings to BellSouth's website are not adequate notifications, nor do they meet the obligations outlined in the AT&T/BellSouth Interconnection Agreement.
7. BellSouth must agree to complete testing in all AT&T collocation spaces ("buzz out") to certify that all cable pairs have continuity between our companies and are terminated correctly.
8. BellSouth must agree to include the testing of cable pairs in the acceptance process for any future collocation space. I appreciate BellSouth's cooperation in working

with AT&T to "certify" our existing interconnections, including ensuring accurate facility assignments. I trust that this effort will continue.

9. AT&T has encountered problems in some ILEC service areas ordering and provisioning UNE loops for customers that are served by integrated digital loop carrier. AT&T would like to understand the extent to which this technology is deployed throughout BellSouth's territory. We need to understand the process for ensuring that AT&T receives timely notification of those unbundled loops served by integrated digital loop carrier, and for providing AT&T with satisfactory alternatives to obtaining a loop in those cases.
10. AT&T has recently experienced a serious problem in some ILEC service areas associated with Local Number Portability, where high usage local trunk groups use 5-digit translations (rather than 7- or 10-digit translations), and inbound calls to our customers go to a disconnect announcement. AT&T would like assurances that this is not an issue in BellSouth's network and that BellSouth's network has been tested for these types of translations.

As your customer, we need to understand fully the quality of the service that you supply to us. Accordingly, it will be necessary to measure and track the quality of the loop hot cut provisioning process, and to further improve the process if for any reason the experience of our customers is not satisfactory. The measures that BellSouth currently reports do not capture these performance failures. Consequently, we must ensure there is a means of measuring the end-user customer experience during the hot cut loop provisioning process. Ultimately, that experience is the true measure of whether or not the process actually works. I hope that you share this belief and will convey that message to your team.

Finally, once a revised hot cut loop provisioning process is explicitly defined, understood and agreed upon, and a performance measurement scheme is identified, we must then come to grips with the equally significant task of ensuring that the process will work successfully under full market conditions. The measures that BellSouth currently reports do not adequately capture this data. I hope that the critical work in development of a defined process and measurement scheme will be completed quickly so that we will be able to test the process and achieve full commercial volumes as soon as possible. In addition, we will need to continually redefine and test our processes as new system capabilities are introduced, e.g., OSS '99 in September of this year.

Although I know that our implementation teams have been working on improving the cutover process, I need your personal involvement to accelerate the effort and determine a date certain by which the necessary procedures will be in place. Please provide a written response by no later than April 19, 1999, committing BellSouth to take the foregoing actions and to place the highest priority on working with AT&T to establish as quickly as possible explicitly defined and agreed upon processes and

Mr. Charles Coe
April 12, 1999
Page 4

procedures for performing "coordinated hot cuts," measuring the customer experience associated with the process and testing the process to support full commercial volumes throughout BellSouth's service areas. BellSouth's ability to deliver UNE loops at commercial volumes will certainly influence AT&T's evaluation of additional interconnection arrangements with BellSouth. I will be asking my team, led by Michelle Augier, to keep me informed of our progress.

Very truly yours,

cc: Mr. Elton King
Group President, Network and Carrier Services

Mr. Scott Schaefer
President, Interconnection Services

7

June 16, 1999

Mr. Charles Coe
President
BellSouth Telecommunications, Inc.
Suite 4500
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

RE: UNE Loops Hot Cuts

Dear Charlie:

The purpose of this letter is to respond to Elton King's letter dated May 17, 1999, and to share AT&T's view on the progress our companies have made regarding coordinated hot cuts.

I am pleased that our teams are talking and meeting on a regular basis and I appreciate BellSouth's commitment to handle AT&T commercial volumes of business. I am also pleased that BellSouth agrees with AT&T that customer outages are unacceptable and that defined processes and procedures are necessary for every phase from order entry through provisioning and maintenance. I am asking the AT&T LSAM team to work with BellSouth to accelerate their implementation of the necessary improvements that will make this process work and give AT&T the ability to deliver on our customers' expectations. Although AT&T was encouraged by BellSouth's improved performance the week after some of the process improvements were implemented, that performance has not been sustained. This leads us to the conclusion that any improvement in BellSouth's performance was coincidental at best. It is my hope that a renewed and disciplined focus on this process will bring these results under control.

Mr. King's letter is very comprehensive regarding the things that BellSouth thinks AT&T needs to change. What is missing, however, are those modifications to BellSouth methods and procedures and the process improvements required of BellSouth and targeted by our teams. The attachment to this letter details AT&T's current position on the specific areas of targeted improvement that were originally outlined in my April 12, 1999, letter.

Mr. Charles Coe
June 16, 1999
Page 2

While we appreciate the cooperation that BellSouth has shown on many of the issues identified in my April 12, 1999, letter, BellSouth's level of cooperation has varied greatly among the issues identified and among all the BellSouth personnel working the issues. I need your support and commitment to solve these challenging issues. Your leadership in inculcating this support throughout BellSouth would be appreciated.

Michelle Augier and her team are eager to operationalize these process improvements and establish reasonable closure dates, and would appreciate the opportunity to work these improvements to conclusion directly with the appropriate BellSouth subject matter experts and with the assistance of Quinton Sanders and his team. As this process moves forward, I also would be delighted to schedule a meeting to review our progress.

Sincerely,

cc: Elton King
Group President
BellSouth Telecommunications, Inc.

Mr. Scott Schaefer
President, Interconnection Services
BellSouth Telecommunications, Inc.

Attachment

- 1. BellSouth and AT&T must have a clear and agreed upon understanding of the process flow supporting hot cuts, from due date minus 48 hours, through the customer installation, test and turn-up. Although BellSouth currently has a process flow defined, there are customers who experience significant downtime at the time of the cut. It is imperative that BellSouth and AT&T isolate and remedy any gaps or flaws in this process.**

BellSouth has provided clarified information regarding the process flow chart. AT&T agrees with BellSouth that the processing of a clean order is important in the overall process and that timely responses to BellSouth's clarifications would expedite the process. AT&T continues to take the necessary steps to improve our ordering process. However, the most significant improvement would occur if BellSouth simply did what it should and is required to do under the contract - return a complete, timely and valid firm order commitment to AT&T.

Currently, BellSouth only confirms back to AT&T that a valid order has been received. No other information is provided. Although AT&T requests both a cut date and a cut time on our local service request, BellSouth confirms only a single date back to AT&T - the in-service date that AT&T then confirms with its retail customer. Unfortunately, BellSouth does not confirm back a scheduled time for the cut to AT&T, nor does BellSouth check the availability of the necessary BellSouth resources, capacity or facilities prior to confirming the scheduled date. AT&T insists that BellSouth change this practice and confirm not only the date and time that BellSouth can complete the work, but also BellSouth's available resources, facilities, capacity and engineering prior to establishing and returning a firm order commitment. This would eliminate a substantial portion of the problems experienced today with coordinated hot cuts. This is currently a BellSouth practice in the access arena and makes good business sense in all of our joint undertakings if the goal is to ensure customer satisfaction.

As was shared with BellSouth in the initial meeting to discuss coordinated hot cut process improvement, AT&T has gone to great lengths to ensure that our circuit facilities database is accurate and that our ordering personnel are assigning clear CFAs to customer orders. At the same meeting we discussed the fact that the BellSouth CFA database is not consistent with AT&T's. Further, the BellSouth and AT&T teams discovered that BellSouth did not appear to have a good process for clearing CFA assignments when a customer was removed from AT&T service, whether through an AT&T disconnect or a BellSouth winback. Since BellSouth will not allow AT&T managers to override BellSouth's erroneous busy CFA, AT&T has agreed to review the BellSouth CFA database and identify CFA assignments that are in error. Our teams met on April 21 and 22. At that meeting, AT&T requested a download of the BellSouth database for the top 20 collocation spaces in order to

ensure consistency between the two databases. As of today, eight weeks after the initial meeting, AT&T has only received information for 18 of the 20 offices. Additionally, although this exercise will accomplish a one-time clean up of BellSouth's database, it does nothing to ensure that BellSouth's records stay current. Obviously, a process improvement on the part of BellSouth is necessary to accomplish this. An accurate and complete database in BellSouth's possession will significantly reduce the number of BellSouth clarifications that have been required because of assignment conflicts.

As for BellSouth's Pending Facilities ("PF") notification to AT&T, AT&T has asked BellSouth to check the process on the BellSouth side. AT&T has not consistently received notification of the "PF" condition. Although AT&T understands that the notification from BellSouth should include a targeted date for available facilities, that has not been our experience. BellSouth needs to improve this process as well.

Of late, AT&T has experienced another problem that the BellSouth team had stated could not possibly occur. Although AT&T received a firm order confirmation from BellSouth, and the dial tone was tested and telephone numbers confirmed, AT&T was unable to cut the customer on the scheduled date because BellSouth had not designed the loop. BellSouth must fix whatever processes are necessary to ensure that this will not recur.

BellSouth states that it will notify AT&T on the day of the loop cutover. This is inconsistent with our experience. AT&T does not consistently receive a call from BellSouth prior to the cut. BellSouth has stated that if AT&T doesn't get a call, then AT&T should call BellSouth. This is not satisfactory. Only BellSouth knows when it will perform the cutover, given the current practices for exchanging information. We still do not understand whether fully documented methods and procedures are in place and whether BellSouth is ensuring that its technicians are following its documented methods and procedures. AT&T's understanding and the plain meaning of the term "coordinated hot cut" is that it involves having technicians from both companies available and involved during the cut. BellSouth must change its process to ensure that this can happen.

The BellSouth Account Team has recommended that the loop be installed and tested prior to the porting of the customer's number. AT&T is considering that recommendation and is in the process of evaluating its feasibility. AT&T will notify BellSouth as to our conclusions.

- 2. Forty-eight hours prior to installation, BellSouth must test for AT&T pre-provisioned dial tone and ANI. Additionally, BellSouth must test to insure that the customer's ANI matches the one noted on the AT&T order.**

BellSouth states that it performs both of these tests within 24 to 48 hours of the installation. Although AT&T agrees, it is our experience that BellSouth's tests are closer to 24 hours rather than 48 hours, which provides little time to correct any

problems that are detected so that the cut can proceed on time, or for AT&T to reach the customer in order to provide advance notification that the cut must be rescheduled if the problem cannot be corrected in time. AT&T requests that BellSouth implement changes in its practices or process improvements to ensure that these tests occur between 40 hours and 48 hours before the installation.

- 3. BellSouth and AT&T must develop an agreed-upon process for notification of loop cut-over completion that includes a viable means of testing and acceptance, as well as appropriate timeframes for all acceptance activities.**

AT&T has reviewed the BellSouth testing and acceptance process and has institutionalized the process in AT&T's work centers.

- 4. BellSouth must improve its process for giving status and detail to AT&T regarding customer outages or trouble tickets associated with coordinated hot cuts. AT&T must have regular, real time status in order to advise customers of repair activities and projected restoration of service.**

AT&T understands that BellSouth agrees that pre-acceptance situations should be jointly worked between BellSouth and AT&T. Constant contact and providing frequent status updates will help AT&T ensure that its customers receive satisfactory service. AT&T's experience has been, on both pre-acceptance and post-acceptance situations, that the AT&T customer care representative must wait an indeterminable period before receiving any status from a BellSouth technician. AT&T LSAM team has asked BellSouth to consider installing a "Status Hot Line" so that AT&T can call and reach someone at BellSouth who has access to the BellSouth Trouble Ticket system and can share status. AT&T has received no response to date and requests intervention at the executive level to ensure that this level of customer service is provided so that AT&T is able to obtain the same status information in serving its customers that BellSouth has in serving its own customers.

Finally, BellSouth has asked AT&T to follow the escalation process that BellSouth has implemented. AT&T's work centers are under instructions to follow the escalation process as outlined by BellSouth. AT&T also expects BellSouth to meet its commitments in that process - specifically by responding to requests for information and escalation. Unfortunately, it has been AT&T's experience that BellSouth personnel frequently have failed to give specific and detailed information and, when paged for follow up, have failed to return the calls. AT&T has experienced an intolerable number of instances where BellSouth personnel apparently completely ignored pages, even though they are listed as the proper and only point of escalation. Without such responsiveness, there is no way that BellSouth's own escalation process can work.

Another issue that is of increasing concern to AT&T is the lengthy period of time it takes to restore service for customers that are put out of service during a cutover. These lengthy outages are intolerable. We request that BellSouth conduct a root

cause analysis of the circumstances that are driving these long mean time to restore ("MTTR") intervals so that changes in processes can be initiated to reduce MTTR intervals.

- 5. BellSouth must develop a process that will insure temporary emergency service restoration back to BellSouth in one hour in the event that a hot cut goes bad.**

AT&T is extremely disappointed in BellSouth's position regarding the provision of an emergency port-back process and BellSouth's corresponding complete disregard for the well being of customers. Not only has BellSouth failed to commit to this at the operational level, William Stacy of BellSouth stated during a performance workshop, held under the auspices of the Louisiana Public Service Commission staff, that BellSouth would never consider such a process. This is not a "perceived" need as BellSouth characterizes it. It is an industry need, which is currently being addressed in the Local Number Portability forum. AT&T would hope that BellSouth would not wait for the slow process of industry committees to resolve such a customer critical issue. AT&T would hope, rather, that BellSouth would assume its important role in this process, as the incumbent supplier for so many of the customers who are trying new service providers, to ensure that customers enjoy uninterrupted critical communications capabilities, and that customers are able to transfer freely between competitors without fear of crippling, and extended, outages. AT&T would also point out that BellSouth's shortsighted view on this issue does nothing to instill customer confidence in its own self-touted devotion to customers' needs. In fact, lack of cooperation suggests a lack of any concern for customers' needs. There are any number of reasons why customers may need emergency portbacks. Although the practice should be the exception and not the rule (indeed, it is not in AT&T's best interest to precipitate a reversion back to BellSouth service), it is not acceptable to require the customer to go through a Retail Winback Group with BellSouth. The *current handling of these situations* deprives customers of access to critical communications, a completely untenable situation, and is plainly anticompetitive. BellSouth must reconsider its position.

- 6. BellSouth and AT&T must develop and agree upon a change control process that will govern the information required for local services requests. Part of this change control process must be a method of timely, proactive notification of changes in requirements. Postings to BellSouth's Web site are not adequate notifications, nor do they meet obligations outlined in the AT&T/BellSouth Interconnection Agreement.**

While BellSouth does have a forum for Electronic Interface Change Control (EICC) in which AT&T participates, not all changes in electronically transmitted local service ordering requirements are addressed in that context. While the CLEC community, which includes AT&T, is led to believe it has input in the context of EICC, in fact, many changes are unilaterally made by BellSouth with no industry input, and frequently with little or no notice. BellSouth makes most, if not practically all the decisions and makes unilateral changes in the requirements, posts those

requirements on the Web site, and implements changes on very short notice and sometimes immediately. AT&T requests that BellSouth treat change control, and its very bilateral requirements, as the very important industry process it should be. BellSouth needs to revamp the change control process to incorporate real business-to-business collaboration on all changes and joint determination of the effective dates for such changes.

Finally, when system changes and system input changes are made, although AT&T is sure that BellSouth feels that posting guidelines to the BellSouth Web site is the easiest way for BellSouth to notify all CLECs, BellSouth's obligations under its Interconnection Agreements with AT&T are to provide AT&T with the same notification as it gives its own employees. One can't imagine that BellSouth implements changes to its critical operating systems solely by placing notices on its internal Intranet. Surely there are meetings, memoranda, and methods and procedures that are circulated to all affected personnel. The interval that AT&T is informed of the change by means of this web-posting process is clearly shorter than the interval that BellSouth knows, and communicates to its own people, that change. Just to adopt the change, post it on the web and implement the change in its work centers, BellSouth has to know of the anticipated change well before the change is posted. AT&T asks that BellSouth modify this process to conform to BellSouth's contractual obligations.

- 7. BellSouth must agree to complete testing in all AT&T collocation spaces ("buzz-out") to certify that all cable pairs have continuity between our companies and are terminated correctly.**

BellSouth has assisted AT&T in testing random cable pairs, as well as allowing certified technicians into BellSouth central offices to complete testing. To date, the central offices have been certified as required. AT&T appreciates BellSouth's facilitating this testing.

- 8. BellSouth must agree to include the testing of cable pairs in the acceptance process for any future collocation space.**

AT&T will insure that our technicians notify BellSouth that our equipment is ready for "service provisioning." Although BellSouth has accommodated our requests for testing up to this point, our team has been given ambiguous signals from BellSouth about whether this can be counted on as an expected ongoing activity. The AT&T and BellSouth Collocation teams are currently working to finalize a business-to-business Collocation Interface Agreement. AT&T will request that this cable pair acceptance process requirement be included in that agreement.

- 9. AT&T has encountered problems in some ILEC service areas ordering and provisioning UNE loops for customers that are served by integrated digital loop carrier. AT&T would like to understand the extent to which this technology is deployed throughout BellSouth's territory. We need to understand the process**

for ensuring that AT&T received timely notification of those unbundled loops served by integrated digital loop carrier, and for providing AT&T with satisfactory alternatives to obtaining a loop in those cases.

The AT&T LSAM group will query the BellSouth team on the deployment of IDLC, the process for understanding alternative arrangements when customers are only served by IDLC, and the methods and procedures that BellSouth proposes to use to inform AT&T of available alternatives so that it may choose the optimum one. As has been indicated before, AT&T requests that BellSouth deliver information regarding whether requested loops are currently served only on IDLC and what alternative arrangements can be used to provide equivalent loops to these customers on its FOC. This would allow AT&T to make a timely decision about alternative facilities. AT&T again requests that BellSouth confirm that they will make such changes to its provisioning process.

- 10. AT&T has recently experienced a serious problem in one ILEC service area associated with Local Number Portability, where high usage local trunk groups use 5-digit translations (rather than 7- or 10-digit translations), and inbound calls to our customers go to a disconnect announcement. AT&T would like assurances that this is not an issue in BellSouth's network and that BellSouth's network has been tested for these types of translations.**

BellSouth has advised AT&T that it has verified its 10-digit translations for Local Number Portability at the tandem level and 7-digit translations at some end offices. Based on representations provided, we understand that this should not be an issue in BellSouth service areas.

- 11. As your customer, we need to understand fully the quality of the service that you supply to us. Accordingly, it will be necessary to measure and track the quality of the loop hot cut provisioning process, and to further improve the process if for any reason the experience of our customers is not satisfactory. The measures that BellSouth currently reports do not capture these performance failures. Consequently, we must ensure there is a means of measuring the end-user customer experience during the hot cut loop provisioning process. Ultimately, that experience is the true measure of whether or not the process actually works.**

AT&T's ability to monitor the experience of its end-user customers is completely dependent on its ability to measure BellSouth's performance as a supplier. In asking for such monitoring, AT&T is not suggesting that BellSouth would in any way replace AT&T for being responsible for the satisfaction of its customers. AT&T intends and will take whatever steps are necessary to ensure that its customers have positive experiences regardless of the supplier AT&T uses. BellSouth asserts that AT&T's requested measurements are not required by the Interconnection Agreement. The request for additional measurements is based on AT&T's experience since those agreements were signed, and is appropriate to assure that BellSouth's hot cut process is working properly and that the Telecom Act's requirements of equal customer

treatment are met. We agree that it would be useful to incorporate agreed upon measures in the Interconnection Agreement as well and plan to do so in the upcoming renegotiation of our interconnection agreements.

AT&T is pleased to see from Elton King's letter to Frank Ianna that BellSouth is receptive to the idea of working together to determine the appropriate measures. AT&T proposed some potential measurements to BellSouth during the Louisiana Performance workshop which it believes will allow the two companies to adequately monitor the performance supporting coordinated hot cuts. Again, it is AT&T's understanding that Mr. Stacy stated in that proceeding that BellSouth would not implement any additional measurements unless ordered to do so by a Public Service Commission or the FCC. AT&T hopes that Mr. King's response better reflects BellSouth's attitude at this time. AT&T and BellSouth need to come to agreement on this very important issue, and AT&T would hope that BellSouth would agree that performance measurements are a critical means of ensuring that customers are being served properly and not require AT&T to litigate such requirements. Please assist AT&T by identifying the appropriate person in BellSouth with whom AT&T should discuss and implement these measurements.

- 12. Finally, once a revised hot cut loop provisioning process is explicitly defined, understood and agreed upon, and a performance measurement scheme is identified, we must then come to grips with the equally significant task of ensuring that the process will work successfully under full market conditions. The measures that BellSouth currently reports do not adequately capture this data. I hope that the critical work in development of a defined process and measurement scheme will be completed quickly so that we will be able to test the process and achieve full commercial volumes as soon as possible.**

While BellSouth has cooperated on many of the issues identified in Frank Ianna's April 12, 1999, letter to Charlie Coe, BellSouth's cooperation has not permeated to all of the issues identified and among all the BellSouth personnel working the issues. Such support is essential to make the process changes and improvements necessary to enable the handling of full commercial volumes.



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July 14, 1999

Sandra Jones
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RE: Hot Cut Action Items

Dear Sandra:

The purpose of this letter is to respond to your letter dated June 15, 1999 regarding the 31 items listed in the Action Item register from the BellSouth-AT&T Process Review conference calls held on May 10 and 11, 1999. As you know, the Action Item register was produced as a result of the April 21 and 22, 1999 meetings between our two companies to discuss the process improvements necessary to permit the successful completion of coordinated hot cuts.

The purpose of this joint effort is to identify and document the required inputs into the BellSouth ordering process, the outputs that AT&T can expect to receive from that process and the timelines for both. However, in your June 15, 1999 correspondence, BellSouth has distorted and misrepresented numerous facts within the 31 identified items, making the identification and resolution of existing problems impossible.

Of particular concern to AT&T is your June 15th statement that "I consider the only open action item from those meetings to be the completion of the database clean-up effort." AT&T strongly disagrees with that statement. There is no satisfactory resolution to many issues that still remain open. The following is a summary of the status of each of the 31 Action Items:

1. Why are CFA/Collocation cable pair notifications not getting back to ALS after identified on day 3 to 5? Is LCSC calling ALS?

- **[BellSouth Response]** The LCSC does not call the CLEC. For the examples provided, notification was given through the clarification process. Orders were supplied by AT&T to change the CFA assignment.
- **[AT&T]** *BellSouth's response does not answer the question. When is the clarification issued by BellSouth?*
- **BellSouth 6/15 Response:** *The busy CFA clarification should be returned to AT&T day 3 – 5; there has been no documentation provided to BellSouth that clarifications have not been returned to AT&T in this timeframe. Please see item # 11 for greater detail. Please review the corrected BellSouth process flow provided to AT&T on 5/14/99.*

BellSouth states that the notification of cable pair problems is to occur on Day 3, Day 4, or Day 5. Indeed the process flow indicates this. However, AT&T is not experiencing this consistently. In fact, most of the problems that AT&T experiences with cable pair mismatches are discovered on the day of cut at the moment that the cut is scheduled. Although they exist, the processes are not in control at this time. AT&T can only believe that the BellSouth technicians are not following the BellSouth Methods and Procedures and that their managers are not mandating adherence to policy. AT&T observed this lack of control while visiting the BellSouth Local Carrier Service Center (LCSC) on June 29, 1999. AT&T has given BellSouth several examples of this problem over the last several weeks. On the day of our visit to BellSouth's LCSC, AT&T orders CHAY9900443 and CX86GC00 were to cut. Circuit Facilities problems were discovered at the time of cut, although AT&T was not notified of any CFA potential problem prior to this. AT&T requests that BellSouth follows its process and make certain that AT&T receives these calls.

2. Do ALS and BellSouth CFA/Collocation cable pair databases match? If not, why?

- **[BellSouth Response]** Account Team is working on setting up method for release to CLECs. This will provide CLECs working knowledge of CFA and cable pairs BellSouth shows in service. This information can be used by AT&T to identify mismatched records. BellSouth has no record of service disconnected in CLEC switch without CLEC sending disconnect order to LCSC. Note: A recommendation was made by the Account Team to AT&T on 4/28/99.
- **[AT&T]** *BellSouth was to provide AT&T a template illustrating how the database spreadsheets will look. BellSouth was also to provide the information for the first office by the end of the week (5/21/99), with the remainder of the offices to be delivered the next week. AT&T was to provide a prioritized list of DLCs for BellSouth to work. AT&T provided list on 5/12/99. As of today, AT&T has only received seven of the 20 offices.*

- ***BellSouth Response: As requested, the template was faxed by Sandra Jones, BellSouth, to Denise Berger, AT&T, on 5/12/99 and a VMS was left for Denise advising her of the fax. We have not been notified of a failure to receive the fax. Anthony Colbert, AT&T, provided the prioritized list to Sandra Jones on Monday 5/17, delaying the beginning and completion of the data retrieval by one day. The first file of the Norcross, GA location (NRCRGAMA) was provided via email from Leigh Ann Wilson, BellSouth, to Denise Berger on Monday, 5/24. AT&T's assumption that each file contained data for only one office in incorrect. Six additional files containing 17 additional offices were sent via email to Denise Berger and Anthony Colbert on 5/25 and 5/26. On Thursday, 6/3, Sandra Jones was advised by Mark Hafley of ALS that the 7 files, 18 offices had not been forwarded to ALS in Denver so that they could begin their work. Leigh Ann Wilson again sent via email the files to Jim Hill, AT&T, who in turn forwarded the files to Mark Hafley. Sandra Jones and Leigh Ann spoke with Jim Hill, Mark Hafley and Dennis Schmidt to review the content of the data files and the expected output from the ALS work. ALS has committed to begin immediately and to return each file to Sandra and Leigh Ann via email as each file is completed.***

BellSouth has not stated all the facts. AT&T attempted to send AT&T's prioritized list of central offices to BellSouth on multiple occasions. Apparently, this was at the same time that BellSouth was experiencing email problems and could not read the entire file. The messages were sent to you on 5/12 @ 4:44 p.m., 5/13 @ 9:05 am and 5/14 @ 3:42 PM. I'm perplexed to understand why BellSouth would state that AT&T was delaying the beginning and completion of the data retrieval by one day. AT&T cannot take any responsibility for BellSouth's inability to retrieve email. AT&T must also address BellSouth's erroneous statement concerning the timely delivery of information within AT&T. Denise Berger did receive an email file from LeighAnn Wilson on 5/24 to which Sandra Jones was copied. Denise was unable to forward internally because LeighAnn stated that "I will provide additional information on how to interpret the data as soon and I am able to gather it" which indicated that the information provided was not useful without the interpretation information. LeighAnn Wilson sent Anthony Colbert an email containing instructions for interpreting data along with the 6 excel files on 5/26 @ 1:45pm. All 7 of the files, along with instructions, were forwarded to the AT&T work Center via email by Anthony Colbert @ 2:10pm. LeighAnn also states in the same email, "Attached are 6 Excel files containing working CFA information for the following locations" to which there is a list of 11 locations (not including Norcross). These were also sent under separate cover to Denise. Therefore, AT&T's assumption was that it was to expect 8 additional files to complete the 20 requested locations identified for clean up. AT&T had no knowledge that the 6 files contained 18 offices until verbally told by Sandra Jones and LeighAnn Wilson at a face to face meeting on 6/10/99, although AT&T had sent repeated letters asking for the additional files. AT&T is unclear why BellSouth thought it necessary to address the issue with the personnel at our Denver work center. In order to minimize disruption, AT&T has requested several times that the BellSouth Account Team work issues through LSAM instead of going directly to the work center. We again ask BellSouth to honor this request. We know that the database snapshot did not match between the two companies. AT&T

simply wants to understand, along with BellSouth, the reasons for the mismatch so that we can insure it doesn't happen again.

3. Why does BellSouth show CFA/Collocation Cable Pairs as busy when they're not?

- **[BellSouth]** See item 2
- *[AT&T] Once the CFA database clean up is completed by BellSouth, and if the maintenance of the database is appropriately managed, this item should disappear. BellSouth has still not delivered a plan to maintain the accuracy of its database.*
- **BellSouth Response:** *BellSouth has not confirmed the root cause of the mismatches between the BellSouth and ALS databases. Without analysis of the order activity associated with some of the mismatches, it is impossible to determine whether ALS failed to issue disconnect orders or whether the mismatch is attributable to BellSouth. However, early indications are that ALS did not issue disconnect orders to the LCSC at the same time internal disconnects were processed. The database comparison that ALS will be conducting with the files provided by BellSouth may help isolate the source of the mismatched data. BellSouth is waiting for ALS to create an exception list by comparing its database with the extracted BellSouth data. Please review the remaining steps of the agreed upon process. Once this exception list is generated by ALS, the Account Team will attempt to provide ALS with the original PON number. This information will be returned to ALS. ALS will make a determination as to the disposition of the BellSouth working circuit, providing a LSR or a spreadsheet for any circuits needing to be disconnected. This should not be considered a BellSouth data base cleanup but an effort to bring the two databases into agreement. If the database work isolates any BellSouth process problems, these will certainly be addressed. BellSouth would like the same commitment from AT&T for the ALS operation.*

AT&T is disappointed that BellSouth is not committed to deliver a defined process to keep the CFA databases in synch. This clean up effort is not just a snapshot to see how far apart the two companies are, but rather an ongoing synchronization so that a repeat of the exercise is not necessary in the future. AT&T requests a commitment from BellSouth that a maintenance mechanism to support the CFA database is developed, documented, and implemented. When can AT&T expect to receive this commitment?

4. When AT&T cancels order, what does BellSouth do to clear the CFA/Collocation cable pairs?

- **[BellSouth]** When BellSouth cancels a service order, internal systems will release the CFA assignments.
- *[AT&T] Does BellSouth send this information to AT&T on the confirmation for supps to cancel an order? How does BellSouth propose to monitor this process, since CFA assignments have not been released by BellSouth in the past?*

- **BellSouth Response: See items #7, #3. CFA information is not provided on the FOC. BellSouth has not been provided with any specific examples where a cancellation by ALS has not resulted in CFA assignments being released in the BellSouth database. If AT&T can provide specific PONs for investigation, BellSouth will research the issue further.**

AT&T is hesitant about providing examples because when we've done so in the past, BellSouth's response when presented with examples is that the event is either (1) human error or (2) an isolated instance. These responses don't give AT&T any indication that neither a process is in place at all, nor that it is robust enough to handle AT&T's customer demands. AT&T has, however, provided BellSouth with several examples of instances where BellSouth has not released a CFA assignment after the cancellation of an order. Some examples were given to BellSouth at the initial meeting on April 20 and 21. Please advise whether AT&T must provide those examples again. AT&T asks that the BellSouth process requested above includes a method of clearing the BellSouth database when AT&T cancels an order.

5. Why does BellSouth verify dial tone with ALS and later uncover CFA/Collocation cable pairs issues?

- **[BellSouth]** This situation should not occur unless changes in cable pairs happen after testing or an incorrect ACTL is provided on the order.
- **[AT&T]** How would changes happen in cable pairs after testing? How do we prevent changes from happening?
- **BellSouth Response: Changes in cable pair or ACTL are initiated by the CLEC, not by BellSouth. Therefore, there is no corrective action or process changes required by BellSouth.**

BellSouth states that no changes are made without a request from the CLEC. AT&T has not requested such changes, nor have we been notified by BellSouth of an incorrect ACTL. AT&T has had orders for which BellSouth has verified that the testing was complete prior to cut date as outlined in the process flow, only to discover that the wiring had not been done at the CO at the time of cut. Consequently, AT&T was unable to meet its commitments to its end-users. Since BellSouth has stated that completing the ANI and dial tone test prior to both the loop design and the central office wiring is a process impossibility, AT&T can only assume that the ANI and dial tone testing was never done as it should. AT&T would like BellSouth to investigate its internal processes and verify that this gap is closed and that BellSouth personnel follow the documented process.

6. When database info around CFA/Collocation cable pairs is in disagreement, how does AT&T escalate for resolution without losing days? AT&T sending a Supp is not an answer. Can AT&T authorize BellSouth to override the assignment discrepancy, and does BellSouth have a process to do this?

- **[BellSouth]** In order to reach our companies' objective of clean databases, supps must be sent for orders to assign new facilities. Without supps, the database mismatches will continue. It is not feasible for BellSouth to develop and implement an override process.
- *If the CFA assignment error is in the BellSouth database and AT&T has asked for a CFA which is only busy in the BellSouth database, then why should AT&T incur the time and expense of issuing a supp? This not only compromises the customer's service delivery date, but also masks BellSouth's on-time performance. Without an override process, how does AT&T escalate for resolution without losing days in the process?*
- **BellSouth Response:** The current situation of the data base mismatch resulting in clarifications for busy CFA is most probably the result of ALS failure to send a disconnect request to BellSouth at the time of the internal ALS disconnect. All CLECs must send supps when making a change in the content of the LSR, including CFA assignments. Documentation of the order request must be in place for both the CLEC and BellSouth. BellSouth continues to support reasonable and agreed upon efforts to correct the current database problem so that both ALS and BellSouth can begin to work within that process. To this end, the Account Team continues beyond the original commitment date to provide interim support to ALS with efforts to quickly identify vacant CFA's when ALS has received a busy CFA clarification. When this support is utilized by ALS, the impact on the order interval is minimized. This interim support process was agreed upon by Sandra Jones, BellSouth and the AT&T/ALS representatives during the meeting in Denver, 4/20 and 4/21 and was to continue through May 7. One step of the process was for ALS to send a supp to correct CFA assignments. Until the busy CFA issue is resolved, AT&T will continue to experience potential delays in the ordering and provisioning process. BellSouth's recommendation to correct this problem is for AT&T to place a high priority on the database cleanup efforts by ALS and to insure that disconnects are issued in a timely manner.

BellSouth cannot assume that the database mismatch is only the result of AT&T's failure. BellSouth does not have an internal process to support a clean database as a normal business activity. AT&T does have such a process. A one-time reconciliation of each company's database will do nothing to alleviate our problems in the long term. In the absence of a BellSouth process, it is impossible to expect anything other than problems in the matching of circuit assignments. Additionally, AT&T's interim agreement with BellSouth is to supp orders when the CFA mismatch is an error caused by AT&T. AT&T will not send a supplemental order when the mismatch is caused by BellSouth. AT&T requests assurances from BellSouth that when AT&T escalates a CFA database mismatch and the mismatch is caused by BellSouth AT&T will not be asked to supp the order for a new due date. AT&T further requests that BellSouth honor the original due date.

7. Can BellSouth populate the CFA on the Manual and Electronic FOC?

- **[BellSouth]** BellSouth is in favor of process changes that will enhance service order accuracy. However, in the manual environment, the same potential for errors exists when adding the CFA information to the "Comments" field of the FOC as exists

when entering the CFA on the service order. Instead of enhancing service order accuracy, this additional step could increase assignment confusion between our two companies. BellSouth also believes that the extra time involved in performing a second manual keying of the CFA for every CLEC would adversely impact the LCSC's ability to process orders in a timely manner. BellSouth has not been able to determine that AT&T's difficulties with busy CFA conditions are caused to any significant degree by service rep typos on BellSouth orders. However, this information will be available to AT&T when orders are submitted electronically to BellSouth because the AT&T rep will enter the CFA assignments to be posted to the system. The LCSC continues to implement quality control initiatives designed to identify and correct.

- *[AT&T] Why can't BellSouth provide the CFA on the FOCs and clarifications for Manual Orders given that AT&T is electronically transmitting orders at this point in time. BellSouth was to push back to the centers for a process change. What was the response or reasonings given?*
- ***BellSouth Response: As committed, the Account Team did readdress this request with LCSC Operations Support and the LCSC management team. Again for parity reasons, the LCSC would be required to provide this information on all CLEC manual orders, not just AT&T. Implementation of this request would adversely impact LCSC productivity; therefore, implementation is NOT feasible. The Account Team is unaware of any electronic orders from ALS, but is anxious to assist AT&T with conversion efforts.***

BellSouth states that this process change would adversely affect them. However, per the AT&T visit to the LCSC, BellSouth reps are keying all information manually into the BellSouth systems, so this would not be a major impact to productivity as indicated by BellSouth. Although the CFA assignment information is done outside of the LCSC, it is the LCSC service representative's responsibility to coordinate and provide information downstream. Why would BellSouth not want to implement a process improvement that is critical to all CLECs? Provision of this information could only help to insure end user customers get the service they request on the day that they expect it. AT&T requests that BellSouth reconsider and supply the CFA assignment information on manual, as well as electronic, FOCs.

8. When BellSouth wins back a customer, how does BellSouth clear CFA/Collocation cable pairs from databases?

- **[BellSouth]** A disconnect order is required to clear CFA/Collocation cable pairs. If BellSouth must reuse the facilities, BellSouth will issue a disconnect order to reclaim them. BellSouth will also issue a LSR to AT&T to port the number and notify AT&T by noting in the "Remarks" section of the LSR that the unbundled loop has been disconnected. If BellSouth does not reuse the facilities from an

unbundled loop, BellSouth will issue an LSR to AT&T only to port the number. In this instance, AT&T should send BellSouth an LSR to disconnect the loop.

- *[AT&T] To remove the human error factor, AT&T would like BellSouth to specify the Loop and /or Port on each LSR disconnected. BellSouth was to check to see what is actually coming across on the LSR today to determine the loop or port. AT&T has not received an answer on this action item.*
- **BellSouth Response: BellSouth does not fully understand your request to "specify the loop and/or port on each LSR disconnected." The information provided to AT&T by BellSouth on the LSR for portbacks is in the response above. If BellSouth must reclaim the loop, "BellSouth will...issue a LSR to AT&T to port the number and notify AT&T by noting in the 'Remarks' section of the LSR that the unbundled loop (circuit id) has been disconnected." If BellSouth does not disconnect the loop, "BellSouth will issue a LSR to AT&T only to port the number." No circuit id or disconnect information about the loop will appear in the "Remarks" section of the LSR. This information was provided to AT&T on 5/12/99 as an addition (denoted in red) to the issues register item #8. The associated action item should be closed.**

AT&T has repeatedly requested that BellSouth complete the LSR to AT&T with the Req Typ Field populated with "BB" to indicate reuse of facilities. In addition, complete the Loop with LNP page of the LSR that is required of AT&T when porting from BellSouth. However, BellSouth has not adhered to this request and is returning LSRs to AT&T in the manner described above which is not in parity with what BellSouth requires of CLECs. AT&T's experience is that BellSouth will complete an LSR to AT&T which indicates "CB" for Req Typ which indicates a number port only with no facilities when indeed facilities are being reused. Why is AT&T being asked to accept what BellSouth will not accept to port numbers? Examples of this include MIA Y9901632, MIA Y9901633, MIA Y9901634 and MIA Y9901635.

9. Why late PF notification?

- [BellSouth] In the manual environment, the LCSC's objective is to give PF notification to AT&T on the same day that the LCSC receives notification that the service order is in PF status. When AT&T submits orders for stand-alone loops electronically, AT&T will receive automatic notification when an order goes to PF status. The same notification for unbundled loops with LNP, for electronically transmitted LSRs, is scheduled to be available 5/30/99.
- *How does BellSouth ensure that PF notifications have been received by AT&T in a manual environment?*
- **BellSouth Response: In the manual environment, PF notifications are returned by BellSouth via fax to the CLEC. A successful transmission report indicates to BellSouth that the fax was transmitted to AT&T. There is no practical way for BellSouth to ensure the fax has been received by AT&T.**

AT&T would like to understand how BellSouth insures that PF notifications are faxed to AT&T's work center in a timely manner. According to our process flow, AT&T should receive these notices from BellSouth on or about Day 3. How does BellSouth collect the manual transmission data to AT&T on the PF notifications so that both the LCSC and AT&T can track PF notification intervals? In the absence of electronically transmitted LSRs, AT&T requests that BellSouth develop an internal process to address this problem and show AT&T a record of the time and date of the PF notification. Absent this, BellSouth cannot ensure that it is sending PF notifications to the CLEC in a timely manner. AT&T requests that BellSouth follows its process and make certain that AT&T receives these calls as documented.

10. How do we insure linked orders are all clarified and/or postponed?

- **[BellSouth]** Orders are coded as related orders in the system. A service representative should update these orders together. When an unbundled loop order goes into FAO (CFA problem) or PF (Pending Facilities) status, the disconnect order remains in AO (Assignable Order) status. AO designates an order waiting for assignments. Without assignments, an order will not flow through the downstream systems to operations to be worked. An order will go into PD (Pending) status after AFIG has assigned the order. If an order is postponed after it has gone to PD status, or if an order goes from PD to PF status, the UNE Center will protect the disconnect order from being worked by translations. Also, neither the C.O. techs nor the outside techs will work an unbundled loop order without authorization from the UNE Center. Previous root cause investigations have documented disconnects in error due to supplements and order updates to change the due date on the AT&T PON just prior to the scheduled due date. In such cases, the downstream work groups do not receive the change prior to the original due date. The primary effort to prevent this occurrence is to minimize or eliminate last minute changes through improved cut planning and coordination. Another potential of an early disconnect is failure by the LCSC service rep or UNEC technician to handle the update in a timely manner. Efforts to prevent such a failure include detailed training, work instructions, coaching and feedback.
- **[AT&T]** *AT&T has requested M&Ps and training materials from BellSouth to further understand potential gaps. AT&T feels that this process gap within BellSouth is causing AT&T customers to receive "out of service" conditions prior to scheduled cuts. BellSouth has stated that they would provide to AT&T an explanation regarding how out of service conditions continue to exist when a cut has to be postponed. BellSouth's process overview does not appear to support out of service conditions, yet they continue to exist. What has BellSouth done to eliminate problem?*

- ***BellSouth Response: BellSouth Methods and Procedures are proprietary documents and are not intended for external distribution. The explanation referenced by AT&T is contained in the above response and was provided to AT&T on 5/12/99 as an addendum (noted in red) to the issues register item #10. What BellSouth, has done to minimize the problem is contained in this same addendum. Further, root cause analysis on past ALS customer service outage situations have shown two major causes. These two causes are:***
 - 1. Last minute order cancellations and due date changes by AT&T.***
 - 2. Porting the telephone number prior to acceptance of the UNE loop by AT&T.******BellSouth continues to make resources available to AT&T to identify and correct process gaps for both AT&T and BellSouth.***

There are many reasons for the cancellation of an order. Although AT&T agrees that the ideal situation would be to keep those cancellations in the 24 hours prior to the service cut to a minimum, these are, at times, necessary. When a cancellation within this 24-hour window is necessary AT&T has agreed to call the BellSouth LCSC with this notification. Most of these cancellations are due to BellSouth's failure to design the loop or its failure to appropriately wire the central office. As stated below question one above, most of the problems that AT&T experiences with cable pair mismatches are discovered on the day of cut at the moment that the cut is scheduled. When this happens, AT&T has no choice but to issue an order cancellation or a supplemental order requesting a new due date. If BellSouth would follow through on its documented policy of completing its work 24-48 hours prior to end-user Due Date, then it would not be necessary to cancel any orders at the last minute. However, although it may be BellSouth's policy to complete a check of the facilities (circuit assignment and central office wiring), the ANI and the dial tone 24 to 48 hours prior to the cut time, it does not appear to be BellSouth's practice in the UNE center, as observed by AT&T during our visit on June 28, 1999. Apparently, the UNE center "screeners" must escalate within BellSouth to try to meet the end-user due date. This will always put the order in jeopardy for the CLEC. In the absence of a call from BellSouth, AT&T must make a call to BellSouth to verify that any given order is indeed going to cut at the prescribed time. BellSouth is not adhering to either its process or its agreement to contact the CLEC with positive dial tone and ANI test results within at least 24 hours prior to port. Regardless of the reason, customers are experiencing service disruptions, up to and including out of service conditions, due to orders not being cancelled. It would appear that BellSouth's "related" orders are not linked in the BellSouth systems. As outlined in the agreed-upon Coordinated Hot Cut process flow, for every one UNE Loop with Number Portability order AT&T sends, BellSouth manually keys at least three orders into the BellSouth internal systems: one Loop order, one Number Portability order and one order to disconnect the translations in the BellSouth switch. When an order is cancelled or supped by a CLEC, what does BellSouth do to insure that all the BellSouth orders are cancelled or supped? This problem existed as recently as June 28, 1999, when AT&T monitored its orders at the UNE Center. Order CXG11N90 was in FAO status until <24 hours prior to due date. Since BellSouth had not cleared the FAO, AT&T was forced to sup the order for a new due date. BellSouth apparently did not stop the disconnect order when the due date was changed. Therefore, the end-user's service was disconnected on the original due date. If the BellSouth's solution to this problem is "detailed training, work instructions,

coaching and feedback.”, why does it continue to happen on a routine basis? AT&T wants BellSouth to understand the linkage of its internal orders and the impact to the CLECs and their customers of BellSouth's not following its own process. AT&T asks that BellSouth analyze its internal process and provide a fail-safe method of catching all the related orders when a supp or cancel is processed.

11. What is metric for clarification of FAO orders? If there isn't one, there should be. AT&T feels this has more severe impact than metric for FOC.

- **[BellSouth]** BellSouth is in agreement with AT&T that FAO status impacts service. Service representatives are held accountable for timely notification to AT&T for any orders in FAO status. The LCSC's objective is to give FAO notification to AT&T on the same day the service representative receives the FAO notification.
- *[AT&T] AT&T assumes that BellSouth is using "objective" in its response to be synonymous with the "metric" requested in AT&T's question. BellSouth has stated that AT&T should receive an FAO status within 48 hours after receiving the FOC. Is this correct?*
- **BellSouth Response:** *It is not a correct assumption that "objective" and "metric" are synonymous. By definition, objective is "an aim, a goal, or end of actions"; metric is "a standard of measurement." It is also incorrect to say that AT&T should receive a FAO status within 48 hours after receiving the FOC. A review of the BellSouth process will show that the notification to the LCSC should occur on day 3 - 5 of the process. As stated above, the LCSC should return the clarification to ALS the day it is received. There is no stated metric for this function that compares to the FOC interval nor is there a published report. At this time there is no obvious business reason to create such a measure. See number 1.*

AT&T is certainly not in dispute with your dictionary definition of "objective" and "metric". However, the original question refers to "metric" and BellSouth only addresses "objective" in its response. AT&T continues to request an answer from BellSouth addressing what is the metric for clarification of FAO orders? BellSouth says that it "is in agreement with AT&T that FAO status impacts service" in its original response and further states that "there is no stated metric for this function" and "at this time there is no obvious business reason to create such a measure". Is "impaired service" not an obvious reason to create a performance measurement? AT&T is appalled that BellSouth would show a blatant disregard for end-user impaired service by not considering this an obvious business reason to create such a measure. BellSouth has clearly stated what the process should be and further clarifies that a metric should not be synonymous with objective. However, upon review during AT&T's visit to the LCSC, AT&T observed that BellSouth is not sending back the FAO order status on the same day in which it is received by that rep. What method does BellSouth have in place to insure that its service representatives are adhering to the defined and documented BellSouth processes? AT&T merely wants to ensure that the process as documented by BellSouth is linked with the objectives and measurements given to the LCSC and UNEC reps and technicians.

12. What is metric for PF order notification?

- **[BellSouth]** Service representatives are held accountable for timely notification to AT&T for any orders in PF status. The LCSC's objective is to give PF notification to AT&T on the same day the service representative receives the PF notification.
- *[AT&T] Again, AT&T assumes that BellSouth is using "objective" in its response to be synonymous with the "metric" requested in AT&T's question.*
- **BellSouth Response: Please see the response for #11.**

Again, same day notification from the BellSouth LCSC to the AT&T work center of "PF" status has not been AT&T's experience. AT&T provided the LCSC management specific customer orders, during AT&T's visit on June 29, which were sitting at the LCSC awaiting PD status. LCSC Management only stated they would investigate. AT&T requests that BellSouth make certain that center personnel follow M&Ps, consistently providing timely "PF" notification, and that they are measured and rewarded accordingly.

13. How does AT&T get reimbursed for busy CFAs that are actually clear?

- **[BellSouth]** If AT&T has issued a disconnect or issued a cancellation LSR that BellSouth has failed to issue, AT&T is entitled to a reimbursement. AT&T would use the standard BellSouth process for bill reconciliation. Note: The Account Team will provide AT&T with additional information on the bill reconciliation process.
- *[AT&T] AT&T is not in receipt of bill reconciliation process to date.*
- **BellSouth Response: Anthony Colbert, AT&T, was advised that Leigh Ann Wilson, BellSouth, was working on assembling the required information on 5/19/99. Follow up email sent to Anthony on 6/3/99 informing him that he would receive information by 6/11/99. The information was actually forwarded to Anthony via email on 6/7/99.**

AT&T is now in receipt of the bill reconciliation process and is being reviewed by internal SMEs to ensure AT&T has the necessary information to operationalize.

14. How does BellSouth insure that the UNE loop is disconnected when BellSouth wins a customer back?

- **[BellSouth]** See item 8.
- *[AT&T] To remove the human error factor, AT&T would like BellSouth to specify the Loop and /or Port on each LSR disconnected. BellSouth was to check to see*

what is actually coming across on the LSR today to determine the loop or port. AT&T has not received an answer on this action item.

- **BellSouth Response: Please see the response for #8.**

Closure of item moved to Item 8.

15. What are BellSouth service representatives required to send back to AT&T on a FOC?

- **[BellSouth]** The service representative will send back the AT&T PON, the version number, the name of the AT&T originator, the LCSC contact number, the BellSouth telephone number being ported, the circuit id of the unbundled loop, the BellSouth order numbers and the due date.
- **[AT&T]** *AT&T is to assume BellSouth's concurrence on cut-times unless notified by BellSouth's UNE Center 24-48 hours prior to cut. BellSouth is to provide a FOC with the due date only and no cut time specified. BellSouth's UNE Center is to contact AT&T if cut time cannot be met @ requested time 24-48 hours prior to cut. AT&T is to assume requested cut time unless otherwise noted. This places the burden of managing BellSouth's internal processes on AT&T. AT&T requests that BellSouth change this practice and confirm not only the date and time that BellSouth can complete the work, but also BellSouth's available resources, facilities, capacity and engineering prior to establishing and returning a firm order commitment. This would eliminate virtually all the problems experienced today with coordinated hot cuts. This is currently a BellSouth practice in the access arena and makes good business sense in all of our joint undertakings if the goal is to ensure customer satisfaction.*
- **BellSouth Response:** *Your request to change the purpose of the FOC from "firm order confirmation" to "firm order commitment" is beyond the scope of this effort. As the Account Team has discussed with AT&T many times, the LCSC representative cannot validate resource availability prior to the FOC, just as BellSouth cannot do so for its retail end user customers. Therefore, the FOC will continue to confirm the issuance of BellSouth service orders after the receipt of a complete and accurate LSR. BellSouth makes every effort to meet AT&T's requested due date and time. BellSouth does not ask, nor expect, AT&T to manage BellSouth's internal processes. However, it is necessary that AT&T work cooperatively with BellSouth's UNEC or project manager to finalize a mutually agreeable cut time. The BellSouth process documents that the UNEC will contact AT&T 24 - 48 hours prior to all scheduled cuts, not just those that are not to be met.*

BellSouth's response indicates an effort but no commitment to meet AT&T's requested due dates and times. However, AT&T has been told verbally numerous times both on conference calls and face to face meetings by the BellSouth Account Team and UNE Center Management that the date issued back on the FOC is what BellSouth will meet

barring any unforeseen discrepancies such as CFA mismatches and BellSouth resources. If the purpose of this effort is to improve process and end-user experiences then why is Firm Order Commitment instead of Confirmation not within the scope of this effort? Are we not attempting to improve processes? During AT&T's UNE Center visit on June 28, AT&T was disappointed to verify through discussions with the UNE "screeners" that it is not BellSouth's policy (nor is it included in their M&Ps) to contact the CLEC 24-48 hours in advance on any orders that are not ready for cut. It was further discovered that the UNE technician's worklist does not show the order until it reaches "PD" status. Therefore, AT&T must compensate for BellSouth's failure to adhere to its stated process by contacting BellSouth on those orders which AT&T does not received the obligatory call from BellSouth 24 hours prior to Due Date. In addition, AT&T verified during its visit to the LCSC on June 29, that it is not BellSouth's policy or instruction through M&Ps to its Service Order Writers ("SOAs") to contact the CLEC on orders that are not ready for cut 24-48 hours in advance. AT&T is concerned that BellSouth has an external commitment to the CLECs, but no internal process to support that commitment. AT&T requests that BellSouth make certain that center personnel follow M&Ps and that they are measured and rewarded accordingly.

16. Why no positive dial tone verification?

- **[BellSouth]** BellSouth performs positive dial tone checks. If AT&T determines that this action has not been taken, BellSouth would like notification so that appropriate action may be taken.
- *[AT&T] AT&T will provide BellSouth more examples as they are identified.*
- **BellSouth Response: No further information required.**

Because AT&T committed to give you examples, we will provide you an example of an order where dial tone and ANI were tested and confirmed with AT&T, but the central office was not wired. AT&T is hesitant about providing examples because past experience has shown that BellSouth's response when presented with examples is that the event is either (1) human error or (2) an isolated instance. These responses don't give AT&T any indication that neither a process is in place at all, nor that it is robust enough to handle AT&T's customer demands. For Order number CX4Q8GC00, on Friday, June 25, 1999, BellSouth verified the Due Date of Monday, June 28, 1999; the Time of cut; Positive Dial Tone Test; and ANI testing. However, on June 28, AT&T was told that the central office had not been wired. AT&T finds that, although Eddie Owens states that this is a "process impossibility," it is a reality. AT&T would like BellSouth to explain how it can verify test results without wiring being done? AT&T requests that BellSouth follows its process, verify dial tone and ANI as documented and make the appropriate calls.

17. Is dial tone actually being checked by BellSouth?

- **[BellSouth]** See item 16.
- *[AT&T] AT&T will provide BellSouth more examples as they are identified.*
- **BellSouth Response: Please see # 16.**

Although the BellSouth process indicates that the dial tone should be checked at least 24 hours prior to the cut, and that central office wiring and circuit assignments should be completed by day five of the implementation process, AT&T still believes that the BellSouth screeners, service order writers and technicians do not adhere to the process. AT&T requests that BellSouth follows its process, verify dial tone and ANI as documented and make the appropriate calls.

18. What do we have to do to move the 24 hour call and dial tone test back to 48 hours prior to due date?

- **[BellSouth]** BellSouth's primary objective is to complete dial tone testing 48 hours before the conversion time. This objective includes contacting AT&T to confirm conversion time or provide notification of any dial tone troubles isolated towards AT&T. BellSouth's secondary objective is to complete dial tone testing 24 hours before the conversion time. BellSouth's ability to meet the primary objective is impacted by the load conditions of workgroups that provision the unbundled loop. In these cases, the secondary objective is BellSouth's attempt to ensure that service will be turned up to AT&T on time. AT&T has agreed to call the UNEC 24 hours prior to the scheduled cut if AT&T has not been contacted by BellSouth.
- *[AT&T] BellSouth will not request a Due Date change from AT&T if the problem on the cut date is caused by BellSouth. BellSouth has committed to work the order on the Due Date. BellSouth will request a supp from AT&T to change the Due Date if the problem is found on the AT&T side.*
- **BellSouth Response: No further information required.**

BellSouth has told AT&T that this call will happen 24 hours prior to cut at a minimum. AT&T has told BellSouth that the ultimate goal is to have these test done 40-48 hours prior to cut. However, AT&T is not convinced that BellSouth is meeting their own 24 hour commitment. Please allow AT&T to recap a normal verification of a Non-complex, Designed Unbundled Voice Loop, CO conversion with LNP:

1. CFA ASSIGNMENT, DESIGN OF LOOP & WIRING OF CO MUST BE COMPLETE

|
2. ORDER RECEIVES PD STATUS
|
|

3. BELLSOUTH TECH PERFORMS DIAL TONE & ANI TESTS

BellSouth has stated that the objective is to do Dial Tone & ANI testing 48 hours in advance that it also measures the UNE Center technicians on testing at least 24 hours prior to End User Due Date. BellSouth has also stated that it is a process impossibility to test Dial Tone & ANI on an order without a PD (Pending Dispatch) order status.

4. BELLSOUTH CALLS CLEC 24-48 HOURS PRIOR TO END USER DUE DATE WITH RESULTS

AT&T has experienced no calls from BellSouth 24 hours prior to cut on orders without Internal BellSouth PD status. AT&T's only information source for jeopardy of cut is AT&T's management of BellSouth's process by contacting BellSouth <24 hours prior to cut for status. This is an AT&T internal process developed in an attempt to better manage AT&T's end-user customer experience if cut is in jeopardy since BellSouth gives no notification.

AT&T requests that BellSouth follows its process as documented and give the appropriate notification.

19. How do we insure linked orders are all clarified and or postponed together? Specifically, what is happening with disconnect orders when loops orders are FAO'd or PF'd?

- **[BellSouth]** See item 10.
- *[AT&T] AT&T has requested M&Ps and training materials from BellSouth to further understand potential gaps. AT&T feels that this process gap within BellSouth is causing AT&T customers to receive "out of service" conditions prior to scheduled cuts. BellSouth has stated that they would provide to AT&T an explanation regarding how out of service conditions continue to exist when a cut has to be postponed. BellSouth's process overview does not appear to support out of service conditions, yet they continue to exist. What has BellSouth done to eliminate problem?*

BellSouth Response: Please see # 10.

As with issue 10, this is not an acceptable answer from BellSouth and AT&T is again requesting process documentation from BellSouth. As outlined in the agreed-upon Coordinated Hot Cut process flow, for every one UNE Loop with Number Portability order AT&T sends, BellSouth manually keys at least three orders into the BellSouth internal systems: one Loop order, one Number Portability order and one order to disconnect the translations in the BellSouth switch. When an order is cancelled or supped by a CLEC, what does BellSouth do to insure that all the BellSouth orders are cancelled or supped? This problem existed as recently as June 28, 1999, when AT&T monitored its orders at the

UNE Center. Order CXG11N90 was in FAO status until <24 hours prior to due date. Since BellSouth had not cleared the FAO, AT&T was forced to supp the order for a new due date. BellSouth apparently did not stop the disconnect order when the due date was changed. Therefore, the end-user's service was disconnected on the original due date. If BellSouth's solution to this problem is "detailed training, work instructions, coaching and feedback," why does it continue to happen on a routine basis? As stated earlier, AT&T wants BellSouth to understand the linkage of its internal orders and the of BellSouth's not following its own process. AT&T asks that BellSouth analyze its internal process and provide a fail-safe method of catching all the related orders when a supp or cancel is processed.

20. When does BellSouth run disconnect orders on UVL with LNP?

- **[BellSouth]** BellSouth will run the disconnect order after AT&T has ported the number and accepted the service. See also item #10.
- *[AT&T] AT&T has requested M&Ps and training materials from BellSouth to further understand potential gaps. AT&T feels that this process gap within BellSouth is causing AT&T customers to receive "out of service" conditions prior to scheduled cuts. BellSouth has stated that they would provide to AT&T an explanation regarding how out of service conditions continue to exist when a cut has to be postponed. BellSouth's process overview does not appear to support out of service conditions, yet they continue to exist. What has BellSouth done to eliminate problem?*
- **BellSouth Response: Please see # 10.**

With the current work efforts around the documentation of the detailed work instructions for the Coordinated Hot Cut Process with Anthony Colbert of AT&T and LeighAnn Wilson of BellSouth, AT&T fully anticipates resolution to this question.

21. How do we prevent all cuts to dead circuits?

- **[BellSouth]** This is against BellSouth policy. BellSouth would like notification when this occurs so that appropriate action may be taken.
- *How is this documented within the BellSouth process to ensure it does not happen? AT&T has begun to experience numerous cuts to circuits that have not been designed, resulting in a customer out of service. AT&T would like to request a in-depth analysis on the part of BellSouth to determine how this can happen repeatedly when it is against BellSouth's policy.*
- **BellSouth Response: Without specifics, it is impossible to determine if the situation described here is a cut to a dead circuit or even a BellSouth issue. The Account**

Team will be happy to research some specific PONs and make appropriate recommendations.

AT&T has provided an example to BellSouth in issue 16. For Order number CX4Q8GC00, on Friday, June 25, 1999, BellSouth verified the Due Date of Monday, June 28, 1999; the Time of cut; Positive Dial Tone Test; and ANI testing. However, on June 28, AT&T was told that the central office had not been wired. This example can be used by the BellSouth Account Team to make recommendations and follow through on internal BellSouth changes. AT&T wants to insure that when a customer's service is transitioned from BellSouth to AT&T, that the facilities are ready to accept the service.

22. Can BellSouth get an index number from AT&T tech, when AT&T accepts service and log? The index number will be AT&T techs initials, date and time and three digit random number.

- **[BellSouth]** BellSouth will note index number in log if AT&T provides one. It will not be feasible for BellSouth to provide ALS with feedback on the frequency with which ALS technicians provide this information.
- **[AT&T]** *AT&T has implemented a tracking number and BellSouth should be prepared to begin receiving immediately.*
- **BellSouth Response:** *The UNEC has confirmed that the technicians are accepting this information when provided by AT&T.*

This item is closed.

23. Can UNE Center provisioning group work with AT&T within a 24-hour period after AT&T acceptance, instead of being referred to Maintenance?

- **[BellSouth]** After AT&T has accepted service, BellSouth will complete the service orders. Once service orders have completed, the most efficient means to clear a trouble in BellSouth is through the UNE Center Maintenance Group. The maintenance group has electronic access to the provisioning logs and will use this information, when applicable, to assist in the trouble isolation process. When reporting a trouble on a loop provisioned within 24 hours of the trouble condition, AT&T should advise the UNEC maintenance tech of this situation. The UNEC tech should handle the trouble in an expeditious manner. If BellSouth fails to do so, AT&T will follow the escalation process.
- **[AT&T]** *BellSouth requested AT&T to alert the BellSouth maintenance supervisor to get special attention when this is needed.*
- **BellSouth Response:** *The escalation process is in place and should be followed when appropriate.*

This item is closed.

24. Is there a way for BellSouth to hold a cut on the due date while a determination is made by AT&T to correct dial tone before a Missed Appointment is logged or a supp required? Note: determination may require UNE Center to open a collocation trouble report for virtual collocation to check DLC cards.

- **[BellSouth]** BellSouth will allow AT&T a reasonable amount of time to check switch translations or any other test activity that can be performed in a short timeframe. However, if physical work has to be performed on collocation equipment, the UNE Center will release any outside technicians involved in the conversion. If the trouble is found to be in BellSouth's equipment, BellSouth will re-dispatch the necessary technicians to perform the cutover on the due date. If the trouble is found to be in AT&T's equipment, AT&T will need to provide BellSouth with a supplement to reschedule the cutover to a new due date.
- **BellSouth Response: No further information is required.**

This item is closed.

25. Short term, implement 30 minute conference call each morning to discuss the scheduled day's work.

- **[BellSouth]** BellSouth should have contacted AT&T 24-to 48 hours prior to the conversion time of the order. If BellSouth has not contacted AT&T 24 hours prior to conversion time, then AT&T should contact the UNE Center Provisioning Group for a status of the order in question. Any technician in the UNE Center provisioning group should be able to give AT&T a status on any order. If a case arises where a technician cannot provide AT&T a satisfactory status, AT&T should escalate to the UNE Center Provisioning Group Management Team. BellSouth believes it is more efficient to handle orders in question on an exception basis, instead of a group conference call to review all scheduled activity. If AT&T has not been contacted by the UNEC tech at least 24 hours prior to the scheduled cut, AT&T will call the UNEC.
- **[AT&T]** *BellSouth should be verifying dial tone test results, order review including things such as number of lines, etc. What steps have been put into place within the UNE Center to reduce AT&T's calling to a minimum? AT&T feels that AT&T calling should be an exception more than a rule.*
- **BellSouth Response: The UNE procedures document the responsibility of the technician to call AT&T 24 – 48 hours prior to the cut. The UNEC management team continues to train and coach UNEC personnel to follow procedure. BellSouth agrees that the necessity for AT&T to initiate the call to the UNEC should be the exception.**

If AT&T finds this to not be the case, please document and notify the UNEC management team or the Account Team.

Please refer to items 9, 10, 11, 12, 16, 17, 19 and 21. These items all point to the importance of AT&T receiving a call from BellSouth at least 24 hours prior to cut. Additionally, these items also highlight BellSouth's lack of commitment to providing the 24-hour call since it is evident that the call is not being enforced internally within BellSouth. BellSouth's agreement that the necessity for AT&T to initiate the call to the UNEC should be the exception is perplexing to AT&T. As stated before, AT&T does not consistently receive these calls and requests that BellSouth investigate its internal processes and guarantee that BellSouth personnel follow the documented process.

26. Can we send FOC when order goes PD status?

- **[BellSouth]** BellSouth sends FOCs when the orders are issued. A FOC is to confirm that BellSouth has received a clean LSR from AT&T. When AT&T inputs orders for stand alone loops electronically, AT&T will receive automatic notification when an order goes to PD status. The same notification for unbundled loops with LNP, for electronically transmitted LSRs, is scheduled to be available 5/30/99.
- **[AT&T]** *How does AT&T fix the problem with current manual orders?*
- **BellSouth Response:** *The BellSouth policy is to send the FOC when orders are issued. There are no plans to change this policy. Please see #15 for details.*

AT&T fully understands that BellSouth has taken the position that the LCSC representative cannot validate resource availability prior to the FOC, just as BellSouth asserts that it cannot do so for its retail end user customers. AT&T believes that this concern could be minimized if the 24-48 hour call prior to cut were happening consistently. Since this call does not currently exist for orders without PD status (and even some with PD status), how can AT&T realistically set end-user expectation without some type of commitment from BellSouth? Additionally, BellSouth's attempt to mask a fix to this problem with an electronically transmitted LSR is not acceptable since all CLECs are not sending LSRs electronically at this point. AT&T requests that BellSouth investigate its internal procedures and guarantee that BellSouth personnel make the appropriate calls as documented.

27. How do we ensure that the Interconnection agreement obligation is met for loop cuts for AT&T orders?

- **[BellSouth]** Further clarification of this question is required.

- *[AT&T] What are the performance measurements in place to ensure that BellSouth is meeting its obligation for timely provisioning of loop cuts as detailed in the Interconnection agreement?*
- **BellSouth Response: What are the specific obligations being referred to?**

In the absence of specific performance measurements under the ICA for Non-complex, Designed Unbundled Voice Loop, CO conversion with LNP, BellSouth has an obligation to provide service at parity to what is being provided to BellSouth retail customers. We will ask our contract negotiation team to address specific measures in the upcoming contract negotiations.

28. If BellSouth does not get dial tone, notifies AT&T and gets no response within 4 hours or by 5PM (whichever is greater), could BellSouth supp the order without AT&T concurrence and can BellSouth track AT&T's failure to respond and provide AT&T this data.

- **[BellSouth]** BellSouth will give AT&T a reasonable amount of time to respond to the No Dial Tone situation. Afterwards, the UNE Center will place the order in missed appointment status. The LCSC will notify AT&T via a Missed Appointment (MA) Notification form faxed to the "initiator" on the LSR. The notification contains information on the PON, end user, MA reason and action required of AT&T. If no response is received within 14 days, the order is subject to cancellation. BellSouth does not have the ability to track AT&T's failure to respond to BellSouth's No Dial Tone notification.
- **BellSouth Response: No further information required.**

This item is closed.

29. How does BellSouth process emergency portbacks (Service Restoration when AT&T and BellSouth can't resolve trouble)?

- **[BellSouth]** BellSouth uses provisioning portback process (known as winback process).
- *[AT&T] AT&T believes that a winback process is necessary for those situations when a CLEC customer contacts BellSouth and requests that his service be brought back to BellSouth. However, AT&T strongly disagrees that the "winback" process is appropriate when there is trouble with the customer's quality of service after the port and the customer is not requesting to be brought back to BellSouth. This is an industry need, which is currently being addressed in the Local Number Portability forum. AT&T would hope that BellSouth would not wait for the slow process of industry committees to resolve such a customer critical issue. AT&T would hope,*

rather, that BellSouth would assume its important role in this process, as the incumbent supplier for so many of the customers who are trying new service providers, to ensure that customers enjoy uninterrupted critical communications capabilities. There are any number of reasons why customers may need emergency portbacks. Although the practice should be the exception and not the rule (indeed, it is not in AT&T's best interest to precipitate a reversion back to BellSouth service), it is not acceptable to require the customer to go through a Retail Winback Group with BellSouth. The current handling of these situations deprives customers of access to critical communications, a completely untenable situation. AT&T asks BellSouth to reconsider its position.

- **BellSouth Response: BellSouth has no plans to implement an emergency portback process. As noted in item #10, two major causes of out of service conditions are as follows: AT&T porting numbers prior to loop testing and AT&T issuing supplements to change the due date just prior to the scheduled date. The necessity of an emergency portback process cannot be supported while these conditions persist. Use of a "winback" process resolves the problem. Of course, BellSouth is not actually winning back the customer nor is the customer given that impression.**

As outlined above, most of the problems experienced are caused by BellSouth not following its own developed and documented processes. BellSouth indicates that it has completed root causes analyses that indicate that the acceptance of a loop prior to a number port would minimize the need for emergency portbacks. Have those analyses been shared with AT&T? Although BellSouth has made the recommendation and AT&T has taken it under advisement, the only advantage appears to be that BellSouth will have more time to complete the central office wiring and the loop design prior to the customer's service actually porting. If BellSouth were to adhere to its own process flow, would this still be necessary? AT&T thinks not. The reasons for late cancellations and supplemental orders remain the same. Although AT&T agrees that the ideal situation would be to keep supps and cancellations in the 24 hours prior to the service cut to a minimum, these are, at times, necessary. When a supp or cancellation within this 24-hour window is necessary AT&T has agreed to call the BellSouth LCSC with this notification. Some of these cancellations are due to BellSouth's failure to design the loop or its failure to appropriately wire the central office. As stated below question one above, most of the problems that AT&T experiences with cable pair mismatches are discovered on the day of cut at the moment that the cut is scheduled. When this happens, AT&T has no choice but to issue an order cancellation or a supplemental order requesting a new due date. If BellSouth were to adhere to its own process flow, most of the late supps and cancels would not be necessary. BellSouth's assertion that the only process for getting the affected customers back in service is to process orders through its retail unit is blatantly anti-competitive.

30. How do we formalize the emergency port back process before the translations are removed? How do we develop an emergency portback process after translations are removed? AT&T expects service to be restored within an hour. AT&T has provided process being used in conjunction with Bell Atlantic.

- **[BellSouth]** BellSouth understands the desire to resolve trouble conditions encountered in the conversion of an Unbundled Loop as quickly as possible. BellSouth is committed to resolve any BellSouth trouble condition encountered on the unbundled loop. If BellSouth is unable to resolve a BellSouth unbundled loop trouble in a timely manner, BellSouth will move the loop back to the BellSouth switch. (An example of a trouble not being cleared in a timely manner would be defective copper cable replacing ISLC without available spare pairs to replace the defective ones.) However, restoring service to the BellSouth switch after AT&T has ported the number becomes a service order driven process for BellSouth. BellSouth doesn't believe that the emergency restoration process is a necessary or effective solution for conversion troubles. BellSouth believes that by ensuring that both companies jointly follow documented and proven ordering and provisioning processes, the need for "emergency restorals" will be minimized. The following activities reinforce this position: (1) BellSouth will test for AT&T Dial tone and confirm that the correct AT&T number is translated to the CFA, (2) BellSouth will not cut an unbundled loop that does not pass the test outlined in item 1. (3) AT&T should perform acceptance testing including a call through test (see the following proposal for a new conversion process) before the number is ported to AT&T. (4) The process available to port numbers back to BellSouth is costly and time consuming for both of our companies. BellSouth believes that the time used to restore service would be more efficiently used to fix the conversion trouble. Therefore, BellSouth would like to offer the following proposal as an improvement to AT&T's provisioning and testing process: (A) AT&T agrees to provision telephone number in their switch with a 10 digit trigger, when the LSR is sent to BellSouth. (B) BellSouth agrees to test for dial tone and determine through ANI/ANAC testing that the correct AT&T number is on the assigned CFA 48 to 24 hours before the due date. (C) BellSouth will perform the tests outlined in item B. on the due date prior to working the conversion. (D) BellSouth agrees it will not convert an unbundled loop to AT&T if the tests in item C reveal a trouble. (E) If the tests in item C are okay, BellSouth will convert the lines to AT&T and test lines to insure conversion was worked correctly. (F) After the conversion and BellSouth testing has been completed, BellSouth will contact AT&T. (G) AT&T agrees to remove 10 digit trigger from the telephone number. (H) AT&T agrees to place an intraoffice test call to the telephone number prior to porting the number. Note: Without the 10 digit trigger an intraoffice call can be completed to the telephone number in the AT&T switch which will complete to the end user over the unbundled loop. (I) AT&T agrees that the telephone number will not be ported until AT&T's testing of the Unbundled Loop has been completed satisfactorily. (J) AT&T agrees to port the number and accept service after AT&T has satisfactorily completed testing service. As of 5/12/99, no policy decisions have been made by BellSouth regarding emergency portback or by AT&T regarding changing the AT&T provisioning and testing process.

- *[AT&T] See # 29. AT&T is considering that recommendation and is in the process of evaluating its feasibility. We will notify BellSouth as to our conclusions.*
- ***BellSouth Response: When can BellSouth expect feedback on the feasibility of the process recommendation?***

Recommendation is still under review at this time.

31. How long does a Frame Tech/UNE Center Tech have to turn up an order and notify AT&T after the schedule cut?

- **[BellSouth]** The estimated time for BellSouth to cutover a single loop is 15 minutes. The time for multi-line cuts depend on the circumstance and complexity of the order. The UNEC technician will call AT&T just prior to starting the cut.
- ***BellSouth Response: No further information is required.***

With the current work efforts around the documentation of the detailed work instructions for the Coordinated Hot Cut Process with Anthony Colbert of AT&T and LeighAnn Wilson of BellSouth, AT&T fully anticipates resolution to this question.

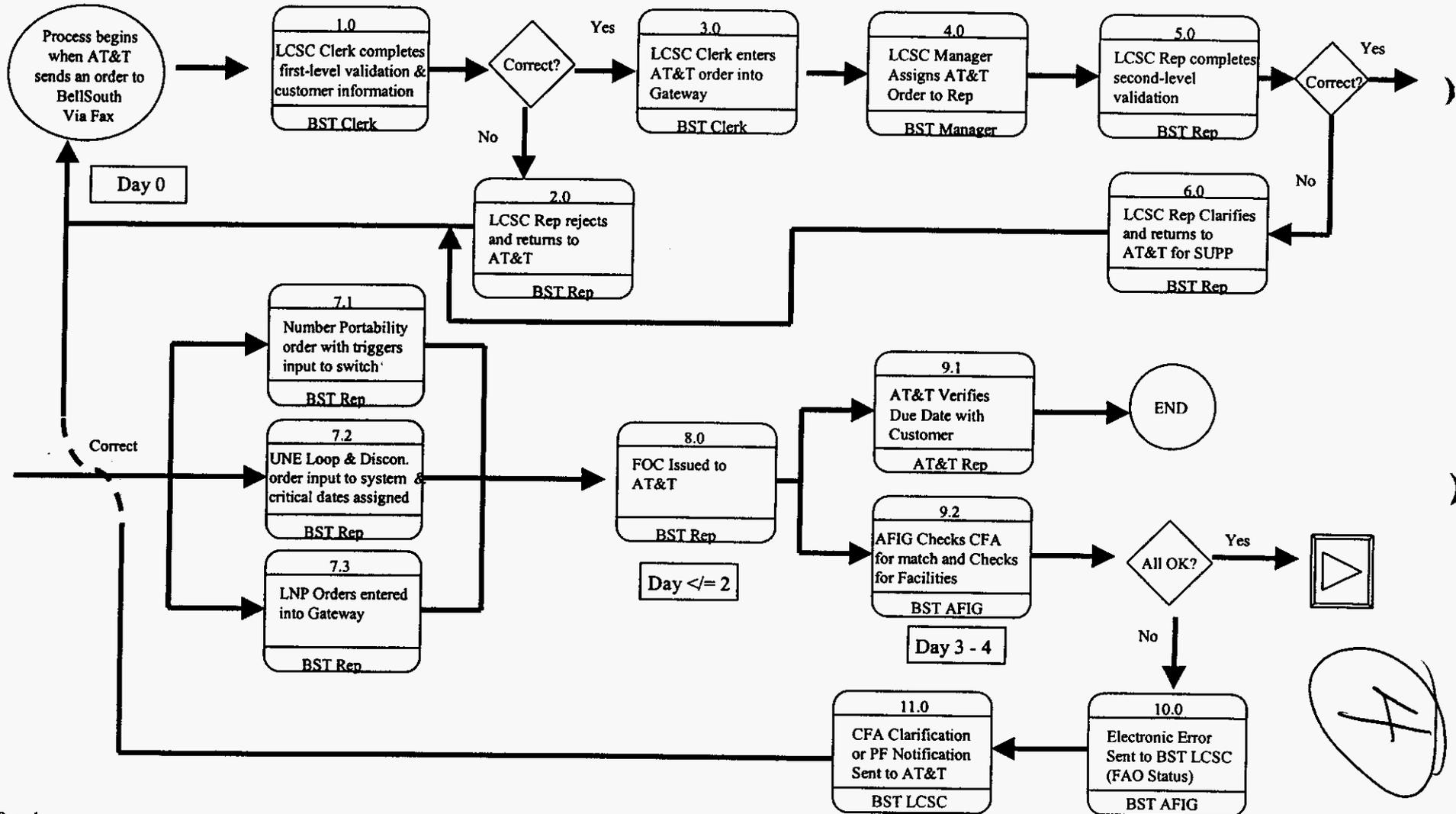
AT&T is eager to gain a clearer understanding of BellSouth's plans to insure adherence to its designed and documented process flow. I look forward to your response.

Regards,

cc: Denise Berger
Jan Burriss

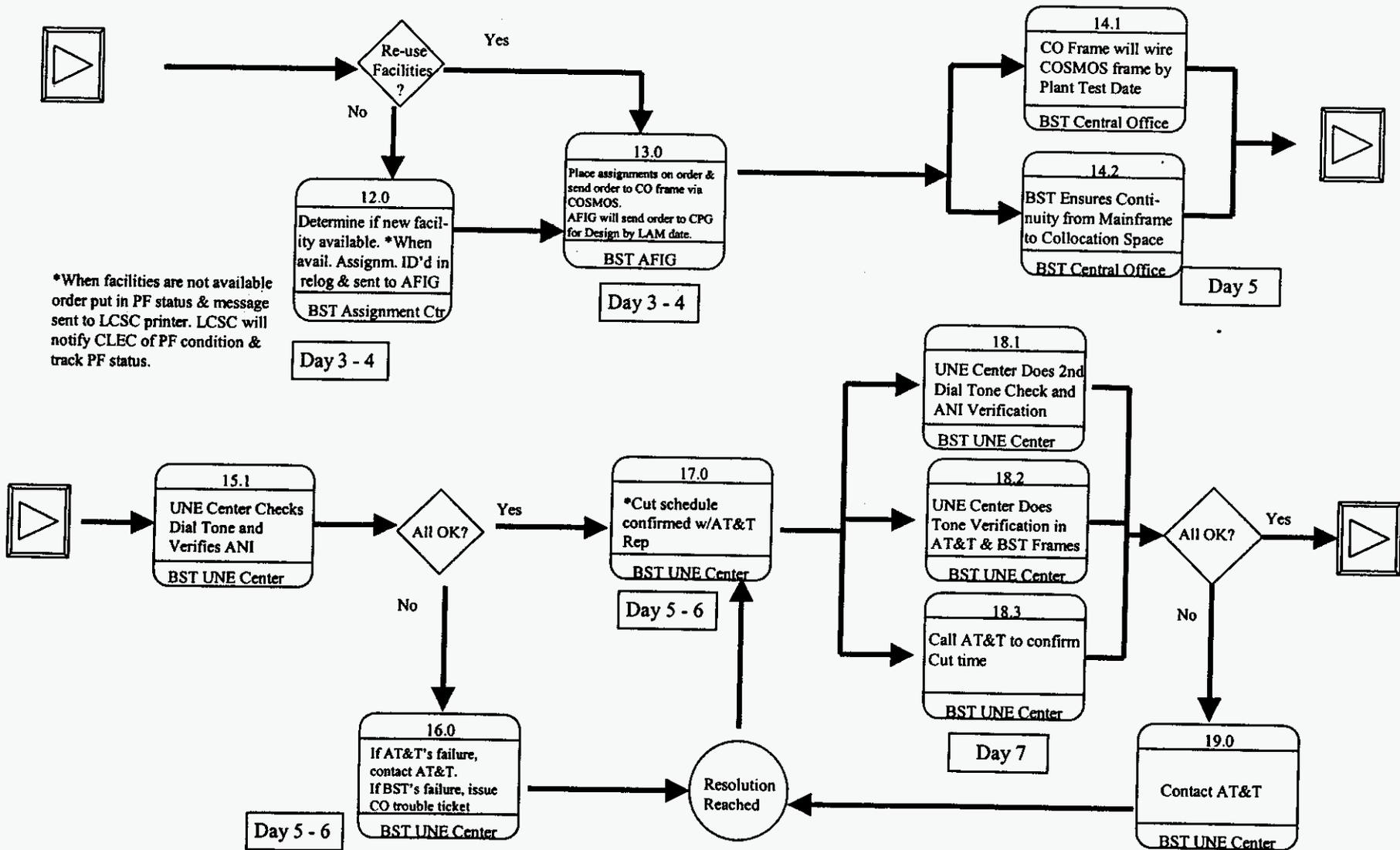
Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



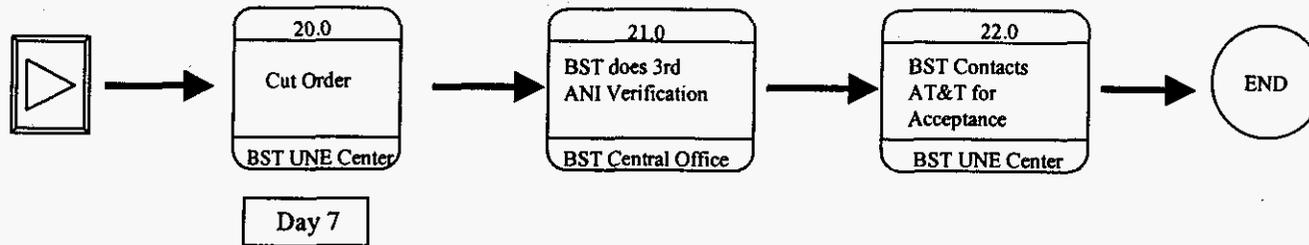
Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



Coordinated Hot Cut Process

Assumption: Non-Complex, Designed Unbundled Voice Loop, CO Conversion, with LNP



Critical Dates

Service Issue Date

Line Assign Made

Design Verify Assign

Wire Office Toll

Frame Completion Date

Plant Test Date

Due Date

Note: Designed orders are tracked in the UNE Center by Critical Dates. When an order is issued (SID), pseudo order drops to WFA-C to alert UNE Center. Order is screened until designed, then loaded to a specific UNE technician.

Complaint No.	Problem/Sequence of Events	Service Via	OSS Function	Cause of Problem	Effect	Solution
251683I (AAI)	Service outage-12/30/98 ATT requested due date 1/12/99; 1/15/99 ATT rec'd FOC dated 1/15/99, since FOC was late ATT requested new due date of 1/29/99; 2/26/99 ATT rec'd FOC with 2/29/99 due date; 2/27/99 Customer advised ATT to cancel order because it was taking too long, ATT sent a cancellation order to BST the same day; 2/17/99 Customer, at the behest of BST, advised ATT of a service outage. BST stated that order was cancelled 1/16/99. ATT, at the behest of BST, advised the Customer to report the outage to BST. Customer again contacted ATT, at the behest of BST, regarding her outage as BST told her that ATT had ownership of her lines. Multiple calls ensued. 2/18/99 Customer reported that service had been restored.	Collocation	Pre-ordering	Untimely FOCs/BellSouth's internal records incorrect or out of date	Customer switched service back to BellSouth (in fact, this customer was never switched to TCG/AT&T at all)	Implementation of hot-cut process that both companies have agreed upon/Adequate maintenance of BellSouth facilities database.
243544I/ 252796I/ 240544I (Borrello)	Service outage-12/5/98 ATT submitted 3 LSRs to BST requesting 12/18/98 due date; 12/8/98 ATT rec'd FOC for 12/18/98; 12/18/98 ATT delayed order for technical clarification and requested new due date of 1/6/99; 12/21/98 BST advised order sent to clarification 12/20/98; 12/29/98 BST rejected the LSRs requesting that the 3 LSRs be submitted on 1 LSR; 12/30/98 ATT submitted 1 LSR order as requested by BST and asked for a 1/4/99 due date; 1/6/99 ATT rec'd no FOC or reject from BST so ATT requested the due date be moved to 1/13/99; 1/13/99 BST rejected order requesting 1 LSR order, instead of 3; 1/14/99 ATT advised BST that the 1 LSR order had already been submitted 12/30/98. ATT rec'd a FOC dated 1/13/99. Customer reported service outage to ATT and BST. 1/15/99 BST advised ATT that customer wished to cancel the order. Customer confirmed wish to cancel and ATT cancelled order directly with BST via a 3-way conference call; 2/3/99 Customer, at	Collocation	Pre-ordering	Absent and untimely FOCs/Inability of BellSouth to track FOCs/BellSouth worked order before it sent the FOC	Customer switched service back to BellSouth	Implementation of hot-cut process that both companies have agreed upon/Adequate maintenance of BellSouth facilities database.

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	the behest of BST, contacted ATT regarding a service outage. ATT generated cancellation paperwork to confirm the verbal discussions with BST on 1/15/99. Service subsequently restored by BST.					
242218R (STS)	<p>Service outage-12/29/98 ATT sent order to BST with requested due date of 1/12/99; 1/12/99 ATT rec'd no FOC or reject from BST so order was re-sent with 1/14/99 requested due date; 1/14/99 ATT rec'd no FOC or reject from BST so order was re-sent with 1/18/99 requested due date; 1/15/99 ATT rec'd FOC with 1/26/99 due date; 1/18/99 ATT confirmed due date with Customer; 1/26/99 Order ported and tested order-one line not working due to incorrect ID of cable and pair assignment by ATT. Order with correct cable and pair info. sent to BST with requested due date of 2/9/99- ATT also became aware of a fourth number to be added which would be submitted on a separate order; 1/27/99 BST reported to ATT that Customer wished to switch back to ATT. Customer advised ATT that they did not wish to switch back but were having dial tone delay problems. Trouble ticket opened with BST; 1/29/99 Customer reports no dial tone on one line, trouble ticket opened with BST. BST reported no dial tone rec'd from ATT at BST switch, ATT technician sent to collocation site. During conf. call between ATT/BST/Customer, Customer considers returning to BST service. Customer confirmed dial tone later that day; 2/1/99 Customer contacts ATT and requests immediate return to BST as one of original three lines not yet ported-neither had the added fourth line; 2/2/99 Customer advises ATT that Customer has had BST restore their service to BST; 2/6/99 ATT confirms customer returned to BST and closed trouble ticket.</p>	Collocation	Pre-ordering Ordering	Absent and untimely FOCs/Incorrect identification of cable and pair assignments/ Delayed dial tone problem	Customer switched service back to BellSouth and refused further contact with ATT	Implementation of hot-cut process that both companies have agreed upon/Adequate maintenance of BellSouth facilities database.