BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 000649-TP

PREFILED DIRECT TESTIMONY

OF SHERRY LICHTENBERG

ON BEHALF OF WORLDCOM, INC.

August 17, 2000

1	Q.	**PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.**

1   Q.   **PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.**

2   A.   My name is Sherry Lichtenberg. My business address is 701 S. 12th St.,

3   Arlington, Virginia 22202. I am employed by WorldCom, Inc. in the Mass

4   Markets Product Development Department as a senior manager.

5   Q.   **PLEASE DESCRIBE YOUR EDUCATION AND EMPLOYMENT**

6   **BACKGROUND.**

7   A.   My duties include designing, managing, and implementing WorldCom's local

8   telecommunications services to residential customers on a mass market basis

9   nationwide, including Operations Support Systems ("OSS") testing. I have

10   nineteen years experience in the telecommunications market, four years with

11   WorldCom and fifteen years with AT&T. Prior to joining WorldCom, I was

12   Pricing and Proposals Director for AT&T Government Markets, Executive

13   Assistant to the President, and Staff Director for AT&T Government Markets.

14   Q.   **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15   A.   The purpose of my testimony is to assist the Florida Public Service Commission

16   ("Commission") in resolving disputed issues between MCImetro Access

17   Transmission Services, LLC ("MCIm") and MCI WORLDCOM

18   Communications, Inc. ("MWC"), both subsidiaries of WorldCom (and which I

19   shall refer to collectively as "WorldCom"), and BellSouth Telecommunications,

20   Inc. ("BellSouth"), with regard to a number of the issues that have arisen during

21   the negotiation of a new Interconnection Agreement. My testimony concerns

22   Attachment 8 relating to business process requirements and addresses Issues 78,

23   80, 81, 83, 84, 88-91, and 96A.

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1   ISSUE 78

2   *How should credit information be provided to MCIW? (Attachment 8,*
3   *Section 1.7.9.)*
4
5   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

6   **CREDIT INFORMATION?**

7   A.   WorldCom has proposed the following language in Attachment 8, with the

8   disputed language shown in bold:

9   **1.7.9 Customer Payment History. BellSouth will participate in**
10   **NCTDE (National Consumer Telecommunications Data**
11   **Exchange) and commit to providing NCTDE with two years of**
12   **historical information on UCAs for their local accounts and**
13   **also report current UCA information in accordance with**
14   **NCTDE required timelines for the purpose of providing**
15   **WorldCom with third party access to Customer Payment**
16   **History. BellSouth will make the following Customer payment**
17   **history information available in accordance with the NCTDE**
18   **format to the extent the same is available for BellSouth's own**
19   **use for each Person or entity that applies for (i) local service;**
20   **or (ii) intraLATA toll Telecommunications Service(s):**
21
22   1.7.9.1 Applicant's name;
23
24   1.7.9.2 Applicant's address;
25
26   1.7.9.3 Applicant's previous phone number, if any;
27
28   1.7.9.4 Amount, if any, of unpaid balance in applicant's name;
29
30   1.7.9.5 Whether applicant is delinquent on payments;
31
32   1.7.9.6 Whether applicant had local or intraLATA toll service
33   terminated or suspended within the last six (6) months with an
34   explanation of the reason therefor; and,
35
36   1.7.9.7 Whether applicant was required by prior local or
37   intraLATA toll provider to pay a deposit or make an advance
38   payment, including the amount of each.
39
40 Q.   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**

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1   A.   The parties should provide credit information to a mutually agreed upon third

2   party credit reporting agency.

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

4   A.   The information should be provided via customer service records.

5   Q.   **WHAT IS THE BASIS FOR WORLDCOM'S POSITION?**

6   A.   WorldCom has proposed that the parties make available to a mutually agreed

7   upon third party credit reporting agency the credit information the parties have

8   agreed to provide each other. This approach will lead to the development of a

9   nationally consistent interface for credit information, rather than credit reporting

10   that varies from carrier to carrier. BellSouth is a member of the Board of

11   Directors of the National Consumer Telecommunications Database Exchange

12   ("NCTDE") and provides customer credit information to the NCTDE. A

13   satisfactory resolution of this issue could be achieved, from WorldCom's

14   perspective, if BellSouth would agree to continue providing this information to

15   the NCTDE (or another mutually agreed upon organization) for the duration of

16   the parties' new interconnection agreement.

17   **ISSUE 80**
18
19   *Should BellSouth be required to provide an application-to-application*
20   *access service order inquiry process? (Attachment 8, Sections 2.1.1.2 and*
21   *2.2.3.)*
22
23   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING AN**

24   **APPLICATION-TO-APPLICATION ACCESS SERVICE ORDER**

25   **INQUIRY INTERFACE?**

26   A.   WorldCom has proposed the following language in Attachment 8:

2.1.1.2 In addition, at WorldCom's request, BellSouth shall
design, develop, implement, test, and maintain an Application-to-
Application access service order inquiry interface.

2.2.3 BellSouth shall provide the following transaction sets for
access order inquiry:

    2.2.3.1 Service Address Validation -- G1.0.   This function
    allows WorldCom to query BellSouth's systems for address
    validation using CUST PREM, working ECCKT, CLLI
    code. BellSouth shall respond with found, not found,
    alternatives, or restricted. BellSouth shall provide
    SWC/LSO and/or address, when appropriate. If ATIS/OBF
    adopts the US Postal Publication 28 Standard for Service
    Address, BellSouth and WorldCom will base their Access
    Inquiry implementation on that standard.

    2.2.3.2 Service Availability -- G2.0: This function allows
    WorldCom to determine service availability or validate the
    earliest date of product service availability requested
    between two (2) SWC locations.

    2.2.3.3 CFA (Channel Facility Assignment) Inquiry -
    G3.0. This function allows WorldCom to query the current
    status of facility channels or slots.

Q.   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**

A.   Such an application-to-application inquiry process is needed to obtain pre-order

information electronically for UNEs ordered via an access service request and

should be provided.

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

A.   BellSouth claims it is not required to provide such a process under the Act.

Q.   **WHAT IS THE BASIS FOR WORLDCOM'S POSITION?**

A.   WorldCom has proposed language that would require BellSouth to develop an

application-to-application access service order process.   WorldCom for some

time now has been using access service requests ("ASRs") to order local services,

and it is those local services for which WorldCom seeks an application-to-

4

1		application capability. Indeed, most of the local facilities WorldCom orders from
2		BellSouth in Florida today to supply dial tone to its customers are combinations
3		of DS1 loop and DS1 transport ("DS1 combos"), which are ordered using an
4		ASR. WorldCom needs pre-order functionalities, including address validation,
5		service availability inquiry and cable facilities inquiry, to enable it to order these
6		local facilities more effectively and to compete on equal footing with BellSouth.
7	Q.	**WHY AS A PRACTICAL MATTER DOES WORLDCOM NEED AN**
8		**APPLICATION-TO-APPLICATION PRE-ORDERING INTERFACE FOR**
9		**LOCAL SERVICES ORDERED USING AN ASR?**
10	A.	Application-to-application processing permits an ALEC, such as WorldCom, to
11		mechanize the ordering function completely. The information gathered in the pre-
12		ordering phase of a sales cycle is the information (such as present services,
13		restrictions and billing name) that ultimately will make up the order. The ability to
14		capture this information electronically during the sales pre-ordering cycle
15		minimizes errors that are typically introduced from manually transferring
16		information from one system to another.
17	Q.	**BELLSOUTH HAS CONTENDED THAT WORLDCOM HAS NO NEED**
18		**FOR AN ASR PRE-ORDERING FUNCTIONALITY BECAUSE**
19		**WORLDCOM CAN ORDER UNES AND RESALE USING LOCAL**
20		**SERVICE REQUESTS. PLEASE RESPOND.**
21	A.	BellSouth's contention apparently is based on its recent decision purporting to
22		require WorldCom to use a manual LSR process to order DS1 combos rather than
23		the electronic ASR process that the parties have been using. A requirement that

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1   WorldCom use a manual ordering process would be a major step backward that

2   would lead to delays, errors and customer dissatisfaction. In resolving this issue,

3   the Commission should require BellSouth to continue making the electronic ASR

4   process available to WorldCom for local orders for which BellSouth does not

5   have a tested, electronic LSR process.

6   **ISSUE 81**

7   *Should BellSouth provide a service inquiry process for local services as a*
8   *pre-ordering function? (Attachment 8, Section 2.2.1.)*
9
10   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

11   **BELLSOUTH'S OBLIGATION TO PROVIDE A SERVICE INQUIRY**

12   **PROCESS?**

13   A.   WorldCom has proposed the following language, which BellSouth opposes:

14   2.2.1   BellSouth shall perform service inquiry as a pre-ordering
15   function as requested by WorldCom.
16
17   Q.   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**
18
19   A.   Service inquiries permit an ALEC to determine the facilities available to serve a

20   customer and the location of those facilities.

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

22   A.   BellSouth refuses to provide service inquiry process based on its contention that

23   service inquiry is a function of ordering, not pre-ordering.

24   Q.   **WHAT IS A SERVICE INQUIRY PROCESS?**

25   A service inquiry process enables the sales representative to find out whether the

26   facilities needed to serve the customer are available, and where they are located.

27   Availability obviously is important because if facilities are not available, it will

1   take longer to provide the service than if they are. Knowing facilities availability

2   enables us to manage customer expectations and likewise enables customers to

3   adjust their plans based on when they can expect to receive the services they wish

4   to order. Knowing facilities location helps in selling to customers that have

5   particular needs such as network redundancy.

6 Q.   **WHAT IS THE BASIS FOR WORLDCOM'S POSITION?**

7 A.   WorldCom requires this information to facilitate local sales. When a WorldCom

8   sales representative is trying to close a sale for local service, the prospective

9   customer may want to know whether facilities exist to provide the service it

10   would like to receive. Customers also want to know the location of facilities so

11   they can determine whether there is sufficient redundancy in the facilities used to

12   serve them.

13   WorldCom has requested that BellSouth provide manual and electronic

14   service inquiry processes for local services that may be used when the local

15   service is being ordered via an LSR or an ASR. BellSouth has access to such

16   information electronically, but BellSouth has refused to make this information

17   available to WorldCom before it submits an order. BellSouth should be required

18   to provide manual and electronic service inquiry processes on a pre-order basis.

19   **ISSUE 83**

20   *Should BellSouth be required to provide downloads of the RSAG database*
21   *without a license agreement? (Attachment 8, Section 2.5.)*
22
23 Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

24   **BELLSOUTH'S OBLIGATION TO PROVIDE DOWNLOADS OF THE**

25   **RSAG DATABASE?**

1   A.   WorldCom has proposed the following language, which BellSouth opposes:

3   2.5.1 Street Address Guide (SAG). BellSouth shall provide MCIm
4   with BellSouth's SAG data through a mutually agreeable
5   electronic means. In addition, BellSouth shall provide MCIm with
6   the file format and record layout of the SAG data. BellSouth shall
7   provide updates to the SAG data via subsequent downloads of the
8   entire SAG data file, as requested by MCIm, but no more
9   frequently than weekly.

11 Q.   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**

13 A.   BellSouth should provide an RSAG database download without a license

14   agreement or use restrictions.

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

16 A.   BellSouth states that it will provide a download of the RSAG database at

17   WorldCom's expense under a license agreement.

18 Q.   **WHAT IS THE BASIS FOR WORLDCOM'S POSITION?**

19 A.   WorldCom and other ALECs obtain pre-ordering information from BellSouth via

20   electronic databases BellSouth has developed. In some cases, ALECs obtain

21   access to this information through BellSouth's OSS interfaces on a "dip-by-dip"

22   basis. In other cases, BellSouth also provides an electronic download of the

23   database that the ALEC can then integrate into its own systems. For example,

24   BellSouth previously has downloaded the PSIMS and PIC databases to

25   WorldCom without charge and without a license agreement.

26   WorldCom seeks the right to obtain a download of the RSAG database,

27   with periodic updates, without a license agreement. In an order interpreting the

28   current MCIm/BellSouth agreement, the Commission has previously held that

29   MCIm is entitled to a download of the RSAG database without the necessity to

8

1   execute a license agreement, although the Commission did impose some

2   restrictions on the use of the RSAG data. (Order No. PSC-00-2001-FOF-TP

3   issued June 6, 2000 in Docket No. 980281-TP).

4   **ISSUE 84**
5
6   *Should the parties be required to develop jointly an implementation plan*
7   *for the ordering of local switching in combination with unbundled loops,*
8   *including UNE-P? (Attachment 8, Section 3.)*
9
10   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

11   **JOINT IMPLEMENTATION OF A PLAN FOR THE ORDERING OF**

12   **LOCAL SWITCHING IN COMBINATION WITH UNBUNDLED LOOPS?**

13   A.   WorldCom has proposed the following language in Attachment 8, Section 3:

14   So that MCIm may order Local Switching in combination with
15   unbundled Loops (including UNE-P), BellSouth and MCIm will
16   jointly develop a detailed, mutually agreeable plan for
17   implementation. BellSouth and MCIm will meet within 30 days
18   after MCIm's written request to commence the joint development.
19   The Parties will complete this development no later than three
20   months after the date of MCIm's written request. The joint
21   implementation plan will address, but not be limited to, the
22   processes to establish MCIm's presence in (ILEC's) switches, and
23   the designs for trunking, signaling routing, line class code or AIN
24   provisioning, operator services, billing, and testing. BellSouth
25   agrees that when MCIm orders Local Switching combined with
26   unbundled Loops (including UNE-P) on a LATA wide or
27   metropolitan-area basis, (a) BellSouth will test, on a random basis,
28   twenty percent (20%) of all the end offices in that area for correct
29   routing and translations and (b) BellSouth will provide those test
30   results at no additional cost to MCIm.
31
32   Q.   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**
33
34   A.   The requested procedures will enhance the smooth roll-out of such combinations

35   and should be adopted.

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

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1   A.   BellSouth's position is that it has already developed a plan to implement UNE-P

2   and has already implemented that plan.

3   Q.   **WHAT IS THE BASIS FOR WORLDCOM'S POSITION?**

4   A.   WorldCom proposes that the parties jointly develop an implementation plan for

5   the ordering of local switching in combination with unbundled loops, including

6   UNE-P. Such a plan would address, among other things, the processes to

7   establish WorldCom's presence in BellSouth's switches and the design for

8   trunking, signaling routing, line class code or AIN provisioning, operator service,

9   billing and testing. WorldCom also has proposed that when it orders local

10   switching in combination with unbundled loops on a LATA wide or metropolitan

11   basis, BellSouth would test twenty percent of its end offices in the area for correct

12   routing and translations. These procedures would help ensure the smooth rollout

13   of such combinations.

14   **ISSUE 88**

15

16   *For customer premises installations, should BellSouth be required, at*

17   *MCIW's request, to cable from the demarcation point to the customer's*

18   *equipment location in accordance with BellSouth's procedures and at*

19   *parity with the provision of such services to BellSouth's customers?*

20   *(Attachment 8, Section 3.2.8.3.)*

21

22   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

23   **CUSTOMER PREMISES INSTALLATIONS?**

24   A.   WorldCom has proposed the following language in Attachment 8:

25   3.2.8.3 In accordance with BellSouth's procedures and on Parity

26   with provision of such services to BellSouth's customers, at

27   WorldCom's request, BellSouth shall, as specified on WorldCom's

28   order, cable from the demarcation point to the customer's

29   equipment location. Rates and charges for this work shall be at

30   Parity with those charged by BellSouth to its customers.

1   **Q.**   **WHAT ISSUE GIVES RISE TO THE PARTIES' DISAGREEMENT OVER**

2   **THIS LANGUAGE?**

3   **A.**   The issue is whether, for customer premises installations, BellSouth should be

4   required, at WorldCom's request, to cable from the demarcation point to the

5   customer's equipment location in accordance with BellSouth's procedures and at

6   parity with the provision of such services to BellSouth's customers.

7   **Q.**   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**

8

9   **A.**   BellSouth should provide parity with respect to the provisioning of inside wire

10   and therefore be required to provide the requested service upon request.

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

12   **A.**   BellSouth's position is that it is not obligated by the Act or the FCC's Rules to

13   install inside wire for WorldCom or end users.

14   **Q.**   **WHAT IS THE BASIS FOR WORLDCOM'S POSITION?**

15   **A.**   WorldCom has proposed that for customer premises installations, BellSouth be

16   required, at WorldCom's request, to cable from the demarcation point to the

17   customer's equipment location in accordance with BellSouth's procedures and at

18   parity with the provision of such services to BellSouth's customers. This

19   procedure is required to provide parity with respect to the provisioning of inside

20   wire.

21   **ISSUE 89**

22   *When BellSouth rejects an MCIW order, should it be required to identify*
23   *all errors in the order that would cause it to be rejected? (Attachment 8,*
24   *Section 3.2.10.1.)*
25

1   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

2   **IDENTIFICATION OF ALL ERRORS ON AN ORDER REJECTION?**

3   A.   WorldCom has proposed the following language in Attachment 8, with the

4   disputed language shown in bold:

> 5   3.2.10.1 BellSouth shall reject and return to MCIm any service
> 6   request that BellSouth cannot provision, due to technical reasons,
> 7   or for missing, inaccurate or illegible information. When an order
> 8   is rejected, BellSouth shall, in its reject notification, specifically
> 9   describe all of the reasons for which the order was rejected.
> 10   **BellSouth shall review the entire order, and shall identify all**
> 11   **reasons for rejection in a single review of the current version**
> 12   **(e.g., ver 00, 01, etc.) of the LSR.**

13

14   Q.   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**

15

16   A.   Identifying all errors in the order will prevent the need for submitting the order

17   multiple times, and such identification therefore should be required.

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

19   A.   BellSouth contends that its systems do not enable it to identify all errors in an

20   order.

21   **ISSUE 90**

22   *Should BellSouth be required to provide completion notices for manual*
23   *orders?*

24

25   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

26   **BELLSOUTH'S PROVISION OF COMPLETION NOTICES FOR**

27   **MANUAL ORDERS?**

28   A.   The parties have proposed the following language, with WorldCom language in

29   bold and BellSouth language in italics:

30

1   3.2.15 Completion Notification. Upon completion of a service
2   request submitted electronically, BellSouth shall submit to MCIm,
3   **via the same electronic interface used to submit the order,** an
4   order completion notification that complies with the OBF/LSOG
5   business rules and ATIS models, as modified by the CCP. **For**
6   **manual LSRs, the completion notification shall be sent**
7   **manually to the MCIm ordering center designated on the LSR.**
8   *Completion information for service requests submitted both*
9   *manually and electronically is available via BellSouth's web based*
10   *system known as CSOTS.*

12 **Q. WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**

14 A. WorldCom should receive completion notices for all orders, including manual

15 orders.

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

17 A. BellSouth contends it should not be required to provide completion notices for

18 manual orders.

19 **Q. WHAT IS THE BASIS FOR WORLDCOM'S POSITION?**

20 A. A completion notice notifies WorldCom that BellSouth has provisioned a service

21 order and that the customer has been switched over from BellSouth to WorldCom.

22 Without a completion notice, WorldCom has no way of knowing whether or when

23 BellSouth has switched over service for an WorldCom customer. WorldCom

24 must know the date that it begins providing service to the customer so WorldCom

25 can bill the customer correctly and provide maintenance and repair services.

26   BellSouth has refused to agree to provide WorldCom completion notices

27 for manual orders. WorldCom is entitled to submit manual orders and BellSouth

28 should be required to receive completion notices when it does so.

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1 **Q. DOES BELLSOUTH'S CLEC SERVICE ORDER TRACKING SYSTEM**

2 **("CSOTS") PROVIDE A SATISFACTORY ALTERNATIVE TO ACTUAL**

3 **COMPLETION NOTICES?**

4 A. No. Although providing completion notification via CSOTS might be convenient

5 for BellSouth, it would be costly and inefficient for WorldCom. Either

6 WorldCom's representatives would be required to monitor CSOTs on a regular

7 basis for completion indications (with the attendant errors that would flow from

8 using such a process), or WorldCom would have to develop systems that would

9 process CSOTS data, along with internal data on manual orders, and route

10 notifications to WorldCom representatives. A process in which BellSouth

11 provides an electronic or manual completion notice as directed on WorldCom's

12 order would be simpler and result in few errors and therefore fewer problems for

13 consumers. BellSouth therefore should be required to provide completion notices

14 for manual orders.

15 Completion notices are required for billing customers. An ALEC cannot

16 start billing until the completion is received. In both New York and Texas, the

17 ILECs provide notices of completion on manually worked and submitted orders.

18 They do this either by fax, an email process, or by entering the completion into

19 their systems, which sends the completion back by EDI in New York and a

20 graphical user interface (known as a "GUI") in Texas. There is no reason that

21 BellSouth could not do this. Indeed, a simple fax or email to the address that sent

22 the order would be better for ALECs and easier for BellSouth than the current

23 process.

1   ISSUE 91

2   *What intervals should apply to FOCs? Should BellSouth be required to*
3   *check facilities before returning an FOC? (Attachment 8, Section 3.4.1.2.)*
4
5   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

6   **FIRM ORDER CONFIRNATION ("FOC") INTERVALS AND WHETHER**

7   **BELLSOUTH SHOULD BE REQUIRED TO CHECK FACILITIES**

8   **BEFORE RETURNING AN FOC?**

9   A.   WorldCom has proposed the following language, which BellSouth opposes:
10
11   3.4.1.2 BellSouth shall provide MCIm a FOC within the following
12   intervals and all such FOCs shall be firm commitments based on
13   BellSouth's check of available facilities.
14
15   3.4.1.2.1 for DS1 service requests (trunk augments or new trunk
16   groups), within two business days after receipt of the ASR;
17
18   3.4.1.2.2 for DS3 service requests (trunk augments or new trunk
19   groups), within three business days after receipt of the ASR;
20
21   3.4.1.2.3 for DS0/DS1 Loops (new Loops or augments to existing
22   service), within two business days after receipt of the LSR; and
23
24   3.4.1.2.4 for DS3 Loops (new Loops or augments to existing
25   service), three business days after receipt of the LSR.
26
27   Q.   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**
28
29   A.   WorldCom's proposed intervals should apply to FOCs. BellSouth should be

30   required to check facilities before returning an FOC so that it represents a firm

31   commitment to provide service on the specified date.

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

33   A.   BellSouth's intervals should apply to FOCs. BellSouth contends that it should not

34   necessarily be required to check facilities before issuing an FOC.

35   Q.   **WHAT IS THE BASIS FOR WORLDCOM'S POSITION?**

                                         15

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1   A.   WorldCom's proposed firm order confirmation intervals should be adopted

2   because they reasonably require a more prompt response to WorldCom's orders

3   then do BellSouth's proposed intervals. In addition, an FOC that WorldCom

4   receives should truly be a "firm" order confirmation that it can rely on, which

5   means that BellSouth must check available facilities and confirm availability

6   before returning the FOC.

7
8   **ISSUE 96A**

9   *Should BellSouth be required to provide customer service record (CSR)*
10   *information in a format that permits its use in completing an order for service?*
11   *(Attachment 8, Section 2.1.2.1.)*

12   Q.   **WHAT LANGUAGE HAS WORLDCOM PROPOSED CONCERNING**

13   **THIS ISSUE?**

14   A.   WorldCom has proposed the following language in Attachment 8:
15
16   2.1.2.1 The Customer Service Record ("CSR") provided by
17   BellSouth in Section 2.1.2 above shall be parsed according to
18   industry standards, and such that the information in the CSR can be
19   readily applied to an LSR by MCIm. If no industry standard
20   exists, the parsing shall be done as specified by the CCP.
21
22   Q.   **WHAT IS A CSR?**

23   A .   A CSR is a customer service record that provides information such as the

24   customer's full name, address and features and services used. An ALEC must

25   obtain access to the CSR to obtain such information so that information can be

26   transferred to a local service order that is submitted to BellSouth.

27   Q.   **WHAT IS WORLDCOM'S POSITION ON THIS ISSUE?**

28   A.   WorldCom's position is that BellSouth should either parse CSR information in

29   accordance with industry standards or, if no industry standards exist, should

1		address the parsing of CSR information through the established Change Control
2		Process (CCP).
3	Q.	**WHAT IS BELLSOUTH'S POSITION?**
4	A.	BellSouth's position is that it provides CSR information to ALECs in the same
5		format it uses internally and is not obligated to further parse such information.
6	Q.	**DOES BELLSOUTH PROVIDE CSRS IN A WAY THAT ENABLES**
7		**ALECS LIKE WORLDCOM TO USE CSR INFORMATION ON A**
8		**MACHINE TO MACHINE BASIS?**
9	A.	No. While BellSouth has agreed to provide WorldCom with access to CSR
10		information, that information is provided in a format that does not permit it to be
11		used to complete an LSR automatically. Specifically, the LSR requires that the
12		information be parsed at a lower level (e.g. the street number must be provided in
13		a different field from street name) than is provided by the CSR. Unless CSR
14		information is parsed at a sufficiently low level that it can be used to populate an
15		LSR electronically, human intervention is required to place an order for service.
16		This human intervention increases error rates and results in rejection of orders at a
17		higher rate than BellSouth experiences for its own services. BellSouth today uses
18		CSR information to populate automatically orders in its own ordering system.
19	Q.	**WHAT IS WORLDCOM REQUESTING?**
20	A.	WorldCom has proposed language that would require BellSouth to parse CSR
21		information according to industry standards in a manner that would allow the
22		information to be readily applied by WorldCom to an LSR. If no industry
23		standards exist, WorldCom proposes that adequate parsing be addressed through

1   BellSouth's established CCP for implementing changes to its OSS. BellSouth

2   refuses to agree to this proposal. In order to provide parity between WorldCom

3   and BellSouth in the ability to electronically process pre-ordering and ordering

4   information, the Commission should require that WorldCom's proposed language

5   be included in the Interconnection Agreements.

6 Q.   **DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?**

7 A.   Yes it does.

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