

I N D E X**WITNESSES****NAME:****PAGE NO.****RONALD M. PATE**

Direct Examination by Mr. Lackey	1257
Prefiled Direct Testimony Inserted	1260
Prefiled Rebuttal Testimony Inserted	1347
Cross-Examination by Ms. Rule	1416
Cross-Examination by Mr. Fordham	1446
Redirect Examination by Mr. Lackey	1457

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EXHIBITS

NUMBER:		ID.	ADMTD.
24	RMP-1 through RMP-18 (Direct); RMP-19 through RMP-25 (Rebuttal)	1409	1461
25	BST Responses to ATT's Interrogatories 2nd Set	1416	1461
26	BST Responses to ATT's Interrogatories 4th Set	1416	1461
27	BST Responses to ATT's Request for Production of Documents 2nd Set (Request No. 18)	1416	1461
28	BST CCP Document Census Voting Ballot	1439	1461
29	Version 2.1 of CCP Document	1439	1461
30	Minutes of January 10, 2001 CCP Process Improvement Meeting	1441	1461
31	E-Mail Dated February 11	1442	1461
	CERTIFICATE OF REPORTER		1462

PROCEEDINGS

(Transcript continues in sequence from
Volume 8.)

MR. LACKEY: BellSouth calls Mr. Pate to the
stand.

RONALD M. PATE

was called as a witness on behalf of BELL SOUTH
TELECOMMUNICATIONS, INC. and, having been duly sworn,
testified as follows:

DIRECT EXAMINATION

BY MR. LACKEY:

Q Mr. Pate, were you previously sworn in this
matter?

A Yes.

Q Would you state your name and address for the
record?

A Yes. My name is Ronald M. Pate. The address is
675 West Peachtree, Atlanta, Georgia.

Q And by whom are you employed, Mr. Pate?

A BellSouth Telecommunications.

Q Mr. Pate, did you cause 87 pages of prefiled
direct testimony to be filed in this proceeding?

A Yes, I did.

Q And was that testimony accompanied by 18

1 exhibits?

2 A That is correct.

3 Q Did you cause 62 pages of rebuttal testimony to
4 be filed in this proceeding?

5 A That is correct.

6 Q And was that accompanied by seven exhibits?

7 A Six exhibits, I believe.

8 Q How many?

9 A Six.

10 Q You're the man. Did you also prepare an errata
11 sheet for both your direct and your rebuttal testimony?

12 A Yes, I did.

13 Q All right. Do you have any changes or
14 corrections to the errata sheet?

15 A No, I do not.

16 MR. LACKEY: Mr. Chairman, could we have this
17 errata sheet included with Composite Exhibit 20?

18 CHAIRMAN JACOBS: It is included as an
19 additional part of Composite Exhibit 20.

20 MR. LACKEY: Yes, sir.

21 BY MR. LACKEY:

22 Q Do you have any corrections to your testimony
23 other than the -- either your direct or your rebuttal,
24 other than that included on the errata sheet?

25 A No, I do not.

1 **Q** If I were to ask you the questions that appear
2 in your direct testimony today, would your answers be the
3 same?

4 **A** Yes, they would.

5 **Q** If I were to ask you the questions that appear
6 in your rebuttal testimony, would your answers be the
7 same?

8 **A** Yes, they would.

9 **MR. LACKEY:** Mr. Chairman, I would like to ask
10 that Mr. Pates' direct and rebuttal testimony be included
11 in the record as if read.

12 **CHAIRMAN JACOBS:** Without objection, shows his
13 rebuttal and direct testimony entered into the record as
14 though read.

15 **MR. LACKEY:** Mr. Chairman, could I ask that Mr.
16 Pates' 18 direct exhibits, or 18 exhibits attached to his
17 direct testimony and six exhibits attached to his rebuttal
18 testimony be marked as Composite Exhibit 24?

19 **CHAIRMAN JACOBS:** Very well. Now, I was just
20 counting through those. I see 25 total exhibits.

21 **MR. LACKEY:** I believe that is correct. I
22 probably need to ask Mr. Pate that. I had that number,
23 too.

24

25

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF RONALD M. PATE
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 000731-TP
5 NOVEMBER 15, 2000
6

7 **Q.** PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.
9

10 **A.** My name is Ronald M. Pate. I am employed by BellSouth
11 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
12 Services. In this position, I handle certain issues related to local
13 interconnection matters, primarily operations support systems ("OSS").
14 My business address is 675 West Peachtree Street, Atlanta, Georgia
15 30375.
16

17 **Q.** PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.
18

19 **A.** I graduated from Georgia Institute of Technology in Atlanta, Georgia, in
20 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of
21 Business Administration from Georgia State University. My professional
22 career spans over twenty-five years of general management experience in
23 operations, logistics management, human resources, sales and marketing.
24 I joined BellSouth in 1987, and have held various positions of increasing
25 responsibility since that time.

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Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have testified before the Public Service Commissions in Alabama, Florida, Georgia, Louisiana, South Carolina, Kentucky, the Tennessee Regulatory Authority and the North Carolina Utilities Commission.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide BellSouth's position on Issue Nos. 6 (item 3), 25, 30, 31 and 32 raised by AT&T Communications of the Southern States, Inc. and TCG South Florida ("collectively "AT&T") in their Petition for Arbitration filed with the Florida Public Service Commission ("Commission") on February 4, 2000. Issue 6 relates to the conversion of existing services to UNE pricing and the remaining issues deal with OSS matters.

Issue 6: Under what rates, terms, and conditions may AT&T purchase network elements or combinations to replace services currently purchased from BellSouth tariffs?

Q. PLEASE BRIEFLY EXPLAIN THIS ISSUE.

A. As explained in BellSouth witness Ruscilli's testimony, this issue centers on the rates, terms and conditions that should govern the conversion of

1 special access services and other services to unbundled network
 2 elements ("UNEs"). All aspects of this issue have been resolved except
 3 the following three items:

- 4
- 5 1) Cost/Prices for converting other services to UNEs;
- 6 2) The application of termination liability charges to services converted to
- 7 UNEs; and
- 8 3) The process for submitting requests for conversions
- 9

10 BellSouth witness Ruscilli will address items 1 and 2. I will address item 3
 11 in my testimony. Specifically, I will address the conversion of BellSouth
 12 retail services to switched combinations, or, stated another way, loop/port
 13 combinations, as it relates to item 3. I do want to state, however, that this
 14 may no longer be an issue, although we have not been able to determine
 15 that with certainty at this point. When discussing a similar issue in the
 16 Georgia arbitration between AT&T and BellSouth, AT&T indicated that
 17 there were only two sub-issues in dispute, sub-issues 1 and 2 listed
 18 above. I will include my discussion of this issue, but it may not actually
 19 need resolution by this Commission.

20

21 Q. PLEASE EXPLAIN THE METHOD THE ALECS MUST USE FOR
 22 CONVERTING EXISTING BELL SOUTH RETAIL SERVICES TO
 23 SWITCHED COMBINATIONS?

24

1 A. Conversions to switched combinations are submitted via the national
2 standard Local Service Request ("LSR"). A single LSR may be submitted
3 for the conversion of all services established under the same Account
4 Telephone Number ("ATN"), i.e., the main telephone number or master
5 billing number under which the end user's Customer Service Record
6 ("CSR") is established. Moreover, if multiple telephone numbers exist
7 under one ATN on a single CSR, a single LSR can be submitted to
8 convert the ATN to switched combinations. In either case, whether the
9 LSR can be submitted manually and/or electronically is determined by the
10 ordering capability defined for the specific switched combination
11 requested.

12
13 Q. HAS BELLSOUTH TRIED TO MAKE IT EASIER FOR ALECS TO ISSUE
14 THIS TYPE OF REQUEST?

15
16 A. Yes. Even though a separate LSR is generally required for each
17 individual ATN for which the ALEC requests a conversion, BellSouth has
18 devised a method by which ALECs may submit a single LSR to convert up
19 to four (4) existing BellSouth retail service ATNs to one switched
20 combination ATN ("many-to-one conversion"). This method requires that
21 the existing retail accounts are for the same service level or type (i.e., all
22 residence or all business), for the same end-user customer, and are
23 located at the same address.

24

1 Many-to-one conversions are applicable only when changing established
2 retail service to its UNE parts with any additional specified changes
3 identified on the LSR, and cover only conversions of those retail services
4 to either residence port/loop combinations or business port/loop
5 combinations.

6
7 The limitation of four conversions per LSR is due to restrictions in
8 BellSouth's systems. The Local Exchange Service Order Generator
9 ("LESOG") can only issue five (5) BellSouth internal service orders per
10 ALEC LSR received electronically. Four conversions on one LSR require
11 the maximum five service orders – four to disconnect the accounts on the
12 BellSouth side, and one to establish the new account on the ALEC side.

13
14 Q. HOW ARE SIMILAR BELLSOUTH RETAIL SERVICE ORDERS
15 PROCESSED?

16
17 A. Requests involving service order activity for BellSouth retail end user
18 accounts still require a single service order for each ATN. The many-to-
19 one conversion process is not currently available to BellSouth retail units.

20
21 Q. DO YOU HAVE PRELIMINARY COMMENTS BEFORE YOU RESPOND
22 TO THE REMAINDER OF THE ISSUES RAISED IN AT&T'S PETITION?

23
24 A. Yes. The remaining issues I address deal with BellSouth's Operations
25 Support Systems, what I generally refer to as OSS in this testimony. I

1 believe that it will be easier for the Commission to place these issues in
2 context if I begin with a discussion of what the Federal Communications
3 Commission ("FCC") has required of incumbent local telephone
4 companies, particularly with regard to access to BellSouth's OSS, the
5 types of OSS that will be available and their functionality. After I conclude
6 that discussion, I will turn to the specific issues in this proceeding.

7
8 Q. DID THE FCC DEFINE NON-DISCRIMINATORY ACCESS TO
9 OPERATIONS SUPPORT SYSTEMS?

10
11 A. Yes. The FCC's August 8, 1996 Order in Docket No. 96-98 ("FCC August
12 8 Order"), at paragraph 312, indicates generally that the quality of access
13 to unbundled network elements must be comparable among and between
14 Alternate Local Exchange Carriers ("ALEC") , and BellSouth. More
15 specifically, paragraph 518 of the FCC's August 8 Order states that "if
16 competing carriers are unable to perform the functions of pre-ordering,
17 ordering, provisioning, maintenance and repair, and billing for network
18 elements and resale services in substantially the same time and manner
19 that an incumbent can for itself, competing carriers will be severely
20 disadvantaged, if not precluded altogether, from fairly competing. Thus
21 providing non-discriminatory access to these support system functions,
22 which would include access to the information such systems contain, is
23 vital to creating opportunities for meaningful competition."

24
25 Q. HAS THE FCC SUBSEQUENTLY REAFFIRMED THIS DEFINITION?

1

2 A. Yes. In paragraph 87 of its Order on BellSouth's second 271 application
3 for Louisiana, the FCC reiterated its requirement "that a BOC must offer
4 access to competing carriers that is analogous to OSS functions that a
5 BOC provides to itself. Access to OSS functions must be offered in
6 'substantially the same time and manner' as the BOC. For those OSS
7 functions that have no retail analogue . . . a BOC must offer access
8 sufficient to allow an efficient competitor a meaningful opportunity to
9 compete."

10

11 Q. DOES BELLSOUTH PROVIDE ALECS NONDISCRIMINATORY ACCESS
12 TO ITS OSS?

13

14 A. Yes. BellSouth provides ALECs nondiscriminatory access to its OSS
15 functions for pre-ordering, ordering, provisioning, maintenance and repair,
16 and billing through robust and reliable manual and electronic interfaces.
17 The electronic interfaces are: LENS, TAG, RoboTAG™, EDI, TAFI, and
18 ECTA (EC-CPM). The acronyms for these interfaces will be discussed
19 shortly and a glossary of these and other terms is provided as Exhibit
20 RMP-1. As a final comment, BellSouth's OSS interfaces for ALECs are
21 operated and available on a regional basis and so the same access is
22 available everywhere, not just in Florida.

23

24 Q. HOW DOES AN ALEC DETERMINE WHICH INTERFACES TO USE?

25

1 A. An ALEC's selection of an interface depends on its business plan and
 2 entry strategy. BellSouth has designed and implemented a variety of
 3 electronic interfaces to suit the varied business plans and entry methods
 4 of the ALECs in BellSouth's region. ALECs can select from among the
 5 interfaces described below to match their particular mix of services,
 6 volume of orders, technical expertise, resources, and future plans. The
 7 following chart depicts the entry methods and the nondiscriminatory
 8 interfaces from which an ALEC may choose.

	Resale	UNEs	Facility-Based
Pre-Ordering	TAG	TAG	TAG
	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™
Ordering & Provisioning	EDI	EDI	EDI
	TAG	TAG	TAG
	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™
Maintenance & Repair	TAFI	TAFI (TN-based)	ECTA
	ECTA	ECTA	EC-CPM
Billing	EODUF	ADUF	N/A
	ODUF	EODUF	
		ODUF	

1

2 Q. PLEASE DESCRIBE THE INTERFACES THAT BELL SOUTH USES TO
3 ACCESS ITS OSS FOR ITS RETAIL CUSTOMERS.

4

5 A. For its retail basic exchange service customers, BellSouth uses two retail
6 marketing and sales support systems to access pre-ordering, ordering,
7 and provisioning information from BellSouth's downstream OSS.
8 BellSouth uses the Regional Negotiation System ("RNS") for most types of
9 residential service requests. For business customers, BellSouth uses the
10 Regional Ordering System ("ROS").

11

12 Q. CAN YOU DESCRIBE GENERALLY THE TYPES OF INTERFACES
13 THAT BELL SOUTH OFFERS TO ALECS THAT ALLOW THEM TO
14 HAVE THE SAME PRE-ORDERING AND ORDERING FUNCTION THAT
15 BELL SOUTH HAS?

16

17 A. BellSouth offers a number of interfaces from which the ALECs can
18 choose. Some are machine-to-machine interfaces that require no human
19 intervention and others are human-to-machine interfaces. We offer both
20 kinds because there are a tremendous number of ALECs out there and
21 the "one size fits all" mentality just won't allow everyone to participate in
22 the manner that they want to. I do want to emphasize, however, that
23 BellSouth simply makes the alternatives available. We do not attempt to
24 dictate which of the interfaces any particular ALEC will utilize.

25

1 Q. LETS BEGIN WITH THE MACHINE-TO-MACHINE PRE-ORDERING
2 AND ORDERING FUNCTIONS. CAN YOU DESCRIBE WHAT IS
3 AVAILABLE FOR THE ALECS?
4

5 A. Yes. BellSouth provides ALECs with a machine-to-machine industry
6 standard Telecommunications Access Gateway ("TAG") pre-ordering,
7 ordering and provisioning interface. The TAG pre-ordering and ordering
8 interfaces provide access to the same pre-ordering, ordering, and
9 provisioning OSS functions accessed by the BellSouth retail systems,
10 RNS and ROS. TAG, which was developed in response to specific
11 requests from mid-sized and large ALECs and in response to the Georgia
12 PSC's Docket No. 8354-U, provides a standard Application Programming
13 Interface ("API") to BellSouth's pre-ordering and ordering OSS. TAG is
14 based on Common Object Request Broker Architecture ("CORBA"), which
15 is the industry standard for pre-ordering. The TAG pre-ordering interface
16 has been available since August 31, 1998. TAG follows the industry
17 standard Ordering and Billing Forum ("OBF") guidelines for Local Service
18 Requests ("LSRs"). The TAG ordering interface has been available since
19 November 1, 1998.
20

21 Q. IS THERE ANOTHER MACHINE-TO-MACHINE ELECTRONIC
22 ORDERING AND PROVISIONING INTERFACE THAT BELLSOUTH
23 PROVIDES TO ALECS?
24

1 A. Yes. BellSouth also provides ALECs with the machine-to-machine
2 Electronic Data Interchange ("EDI") ordering interface. EDI allows ALECS
3 to access the same ordering and provisioning OSS functions accessed by
4 RNS and ROS for BellSouth. EDI follows the industry standard protocol
5 (EDI) for ordering and the industry standard OBF guidelines for LSRs.
6 EDI has been available to any interested ALEC since December 1996.

7

8 Q. CAN AN ALEC INTEGRATE ITS OWN INTERNAL OSS WITH
9 BELL SOUTH'S TAG AND EDI INTERFACES?

10

11 A. Yes. In accordance with the FCC's requirements, BellSouth provides
12 ALECs with all the specifications necessary for integrating the BellSouth
13 interfaces. An ALEC may integrate ordering and pre-ordering functions
14 by integrating the TAG pre-ordering interface with the EDI ordering
15 interface, or by integrating TAG pre-ordering with TAG ordering. ALECs
16 interested in integrating the pre-ordering and ordering systems with their
17 own internal systems must, of course, have their own internal OSS, and
18 have responsibility for that integration. By requiring BellSouth to provide
19 "the specifications necessary to instruct competing carriers on how to
20 modify or design their systems in a manner that will enable them to
21 communicate with the BOC's legacy systems and any interfaces utilized
22 by the BOC for such access," it is clear that the FCC intended that the
23 ALECs, not BellSouth, would perform the necessary integration.
24 Ameritech Michigan Order, paragraph 137.

25

1 Q. WHAT ARE THE ADVANTAGES OF THIS KIND OF INTEGRATION?

2

3 A. The interfaces BellSouth makes available for ALECs provide non-
4 discriminatory access to the pre-ordering, ordering, and provisioning
5 information and functions in BellSouth's OSS, while also allowing the
6 ALECs to develop their own customer service systems, including their own
7 pricing, packaging, sales, and customer account recommendations. By
8 using the integratable interfaces, ALECs can customize their own
9 marketing and sales support systems to perform functions such as
10 automatic telephone number selection, preferred and local interexchange
11 carrier (PIC/LPIC) searches, and credit checks (after contracting with a
12 third party credit reporting agency). Integratable interfaces allow ALECs
13 to design the appearance and "feel" of their marketing and sales support
14 systems as they see fit; this is one of the advantages of integration and
15 machine-to-machine interfaces. Because these ALECs' marketing and
16 sales support systems integrate the electronic interfaces with the ALECs'
17 own internal OSS, ALECs can use information obtained via the electronic
18 interfaces to build their own databases, such as databases of their own
19 local customer service records.

20

21 Q. ARE THERE OTHER CHOICES AVAILABLE FOR ALECS THAT DO
22 NOT WANT TO USE THESE INTEGRATABLE MACHINE-TO-MACHINE
23 ELECTRONIC INTERFACES?

24

1 A. Yes. Because BellSouth recognizes that there are ALECs that have
2 decided not to use integratable machine-to-machine interfaces, BellSouth,
3 offers ALECs a variety of other interfaces to suit their needs and business
4 plans for preordering, ordering and provisioning.

5

6 For ALECs that wish to use TAG for pre-ordering, ordering, and
7 provisioning in conjunction with their own databases, but have made the
8 business decision not to hire programmers to develop and maintain their
9 own TAG interface, BellSouth sells an interface called "RoboTAG™." This
10 interface was developed by Science Applications International Corporation
11 (SAIC), under contract with BellSouth. RoboTAG™ is a standardized,
12 browser-based interface to the TAG gateway that resides on an ALEC's
13 LAN server, and provides integrated pre-ordering and ordering with up-
14 front editing. BellSouth first made RoboTAG™ available in November
15 1999. The first ALEC that purchased RoboTAG™ completed testing and
16 was ready for production on November 24, 1999.

17

18 Q. DOES BELLSOUTH OFFER A HUMAN-TO-MACHINE INTERFACE
19 THAT OFFERS PRE-ORDERING, ORDERING, AND PROVISIONING?

20

21 A. Yes. For ALECs that have made the business decision not to integrate
22 pre-ordering, ordering and provisioning interfaces with their own internal
23 OSS, and do not want to expend the resources necessary to use
24 RoboTAG™, BellSouth makes available the human-to-machine Local
25 Exchange Navigation System ("LENS") interface. LENS is a web-based

1 graphical user interface ("GUI"). The LENS GUI requires software
2 development only on BellSouth's side of the interface. With the release of
3 version 6.0 of LENS on January 14, 2000, LENS became a GUI to the
4 TAG gateway. LENS now uses TAG's architecture and gateway, and
5 therefore has TAG's pre-ordering functionality for resale services and
6 UNEs, and TAG's ordering functionality for resale services. While LENS is
7 not integratable with an ALEC's internal OSS, LENS does provide
8 integrated pre-ordering and ordering in its firm order mode. In order to
9 use LENS, an ALEC must have, at a minimum, a personal computer, web
10 browser software, and an internet connection to use LENS (of course, the
11 ALEC must also test with BellSouth, attend training, and obtain a
12 password). LENS has been available since April 1997.

13
14 Q ONCE AN ORDER IS PLACED, DOES BELLSOUTH HAVE AN
15 INTERFACE AVAILABLE TO ALECS THAT ALLOWS THEM TO CHECK
16 THE STATUS OF THE ORDER?

17
18 A. Yes. The ALEC can use the CLEC Service Order Tracking System
19 ("CSOTS"), which became available in December 1999. This web-based
20 electronic interface allows ALECs to view service orders on-line, track
21 service orders, and determine the status of their service orders.
22 Specifically, ALECs can view their orders as they appear in BellSouth's
23 Service Order Communication System ("SOCS"), and obtain other useful
24 provisioning and status information, such as jeopardy statuses, pending
25 facilities (PFs), and missed appointments (MAs). CSOTS provides ALECs

1 with a "view" that shows service orders by order status and by state.
2 CSOTS also allows ALECs to search for information using a variety of
3 criteria, including a range of due dates; the current due date; the
4 telephone account number; the service order number; and the purchase
5 order number ("PON"). ALECs can sort this information by PON, by NPA
6 NXX, by status type, by the number of days orders have been in a
7 particular status, by listed name, by service order number, by current due
8 date, and by application date. CSOTS offers ALECs the option of viewing
9 and/or downloading provisioning information using Microsoft's Excel™
10 spreadsheet program.

11
12 Q. TURNING NOW TO THE OTHER FUNCTIONS THAT BELLSOUTH
13 MUST MAKE AVAILABLE TO ALECS, CAN YOU DESCRIBE WHAT
14 MAINTENANCE AND REPAIR INTERFACES BELLSOUTH USES FOR
15 ITS RETAIL CUSTOMERS?

16
17 A. For BellSouth's retail customers with Plain Old Telephone Service
18 ("POTS"), BellSouth's business and residence repair center attendants
19 use either a business or residence version of the human-to-machine
20 Trouble Analysis and Facilitation Interface ("TAFI"). For non-POTS
21 services, BellSouth uses the human-to-machine WFA-C interface.

22
23 Q. WHAT INTERFACES DOES BELLSOUTH OFFER ALECS FOR
24 MAINTENANCE AND REPAIR?

25

1 A. BellSouth offers TAFI to ALECs. The TAFI system for ALECs combines
2 the complete functionality of the separate business and residence
3 versions of TAFI used by BellSouth's repair attendants.
4

5 Q. TAFI IS A HUMAN-TO-MACHINE INTERFACE WHETHER USED BY
6 BELLSOUTH OR AN ALEC. DOES BELLSOUTH PROVIDE ALECS
7 WITH A MACHINE-TO-MACHINE TROUBLE REPORTING INTERFACE
8 IN ADDITION TO THE TAFI INTERFACE?
9

10 A. Yes. BellSouth also offers ALECs the machine-to-machine Electronic
11 Communications Trouble Administration ("ECTA") Gateway, which
12 conforms to the T1/M1 standard for local exchange trouble reporting and
13 notification. I should note, to be complete, that BellSouth also offers the
14 human-to-machine EC-CPM interface, which provide access to
15 BellSouth's OSS for POTS and non-POTS services and UNEs.
16

17 Q. CAN YOU TELL US THE DIFFERENCE BETWEEN TAFI AND ECTA?
18

19 A. I will explain the difference in detail later in my testimony but basically
20 TAFI allows the BellSouth or ALEC representative to input a trouble and
21 get feedback, often while the end-user customer is still on the line. The
22 ability to get feedback right away is not available in ECTA. However,
23 ECTA can be integrated with the ALEC's internal OSS and databases,
24 whereas TAFI cannot.
25

1

2 **Issue 25: What procedures should be established for AT&T to obtain loop-**
3 **port combinations (UNE-P) using both Infrastructure and Customer**
4 **Specific Provisioning?**

5

6 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF THIS ISSUE?

7

8 A. Based on the information in AT&T's matrix, the information contained in
9 proposed interconnection agreement language submitted with its petition
10 and the negotiations that have occurred between the two parties,
11 BellSouth understands that this issue deals with the way that AT&T will
12 order Operator Service/Directory Assistance for its subscribers. AT&T
13 wants the ability to submit two types of orders; 1) an infrastructure
14 provisioning or "footprint" order to establish a specific single, or "default",
15 OS/DA routing plan and 2) individual LSRs for specific AT&T end user
16 customers.

17

18 Q. CAN YOU ELABORATE ON WHAT AT&T WANTS WITH REGARD TO
19 THIS ISSUE?

20

21 A. It is my understanding that, with regard to the "footprint order", AT&T is
22 requesting a mutually agreed upon documented process that BellSouth
23 and AT&T will follow to implement AT&T's request to have its customers'
24 calls routed to a BellSouth OS/DA platform, but to have the call
25 unbranded. This issue is discussed in more detail in Mr. Milner's

1 testimony, but assuming that what AT&T is requesting is a "default"
2 routing, BellSouth can provide that electronically.

3
4 Q. HAS BELLSOUTH PROVIDED AT&T WITH PROCEDURES TO
5 ESTABLISH THE "FOOTPRINT ORDER"?

6
7 A. Yes. BellSouth has provided information to allow AT&T to adopt any one
8 of three "default" routings for its OS/DA calls. Procedures to establish the
9 "footprint order" were first provided in the proposed contractual language
10 for AT&T's interconnection agreement. In August of 2000, BellSouth
11 provided AT&T "footprint order" contractual language for the OS/DA
12 unbranded routing option. On October 23, 2000, BellSouth provided
13 additional language for a custom branded option. On October 26, 2000,
14 BellSouth provided language for a third party platform routing option.

15
16 Q. DOES AN INDUSTRY STANDARD EXIST THAT CAN BE USED TO
17 ACCOMPLISH WHAT AT&T IS ASKING FOR?

18
19 A. No. An industry standard has not been approved by the Ordering and
20 Billing Forum ("OBF"), a subcommittee of the Alliance for
21 Telecommunications Solutions ("ATIS"), governing the location of a
22 customized branded or unbranded routing code on an electronic order. As
23 clarification, ATIS is the primary body addressing industry standards and
24 guidelines in these areas.

25

1 However, BellSouth is willing to provide AT&T with the capability of
2 submitting individual customer LSRs electronically. Furthermore, as the
3 result of AT&T's request for an OS/DA unbranded routing option, and
4 subsequent negotiations between the two parties, BellSouth has
5 developed the electronic ordering capability to automatically identify and
6 generate specified Line Class Codes ("LCC") on behalf of AT&T when
7 AT&T selects the OS/DA unbranded option. BellSouth has targeted this
8 feature for implementation in Release 8.0 on November 18, 2000.

9
10 Q. WHAT ADDITIONAL ENTRIES ARE REQUIRED OF AT&T TO SUBMIT
11 LSRS FOR UNBRANDED OS/DA?

12
13 A. AT&T will submit LSRs for unbranded OS/DA in accordance with standard
14 BellSouth business rules for ordering port/loop combinations. No special
15 or additional entries are required.

16
17
18 ***Issue 30: Should the Change Control Process be sufficiently***
19 ***comprehensive to ensure that there are processes to handle at a***
20 ***minimum the following situations:***

- 21 ***a) introduction of new interfaces;***
22 ***b) retirement of existing interfaces;***
23 ***c) exceptions to the process;***
24 ***d) documentation, including training;***
25 ***e) defect correction;***

- 1 **f) emergency changes (defect correction);**
2 **g) an eight-step cycle, repeated monthly;**
3 **h) a firm schedule for notifications associated with changes initiated by**
4 **BellSouth;**
5 **i) a process for dispute resolution including referral to state utility**
6 **commissions or courts;**
7 **j) a process for escalation of changes in process.**

8

9 Q. WHAT IS THE CHANGE CONTROL PROCESS?

10

11 A. As the Commission knows, the ALECs are entitled to have access to the
12 OSSs utilized by BellSouth to provide service to its customers. To
13 facilitate this access, the interfaces that I have previously mentioned,
14 TAG, EDI, LENS and so forth, have been developed. Obviously changes
15 in these interfaces are of importance to both BellSouth and the ALECs.
16 The Change Control Process ("CCP") is the process by which BellSouth
17 and the ALECs manage requested changes to the ALEC interfaces, the
18 introduction of new interfaces, and provide for the identification and
19 resolution of issues related to change requests. This process will cover
20 change requests that affect external users of BellSouth's electronic
21 interfaces, associated manual process improvements, performance or
22 ability to provide service including defect notification. Associated
23 documentation is included in this process.
24 The Change Control Process itself is documented in a publication that is
25 now in version 2.0, and that is attached to my testimony as Exhibit RMP-2.

1

2 Q. IN ITS RECENT ORDER APPROVING BELL ATLANTIC'S NEW YORK
3 APPLICATION FOR LONG DISTANCE, HOW DID THE FCC DESCRIBE
4 "CHANGE MANAGEMENT"?

5

6 A. The FCC stated, "The change management process refers to the methods
7 and procedures that the BOC employs to communicate with competing
8 carriers regarding the performance of and changes in the BOC's OSS
9 system. Such changes may include operations updates to existing
10 functions that impact competing carrier interface(s) upon a BOC's release
11 of new interface software; technology changes that require competing
12 carriers to meet new technical requirements upon a BOC's software
13 release date; additional functionality changes that may be used at the
14 competing carrier's option, on or after a BOC's release date for new
15 interface software; and changes that may be mandated by regulatory
16 authorities." [Emphasis added.] Bell Atlantic New York Order, ¶103Q.

17

18 Q. DOES BELLSOUTH HAVE A GENERAL POSITION ON THE INCLUSION
19 OF THIS ISSUE IN THIS ARBITRATION?

20

21 A. Yes. BellSouth's position is that the content of the CCP is not an
22 appropriate issue for arbitration with an individual ALEC. The CCP was
23 established through collaboration between interested ALECs, including
24 AT&T, and BellSouth. The changes submitted through this process are
25 handled collaboratively by the participating ALECs and BellSouth. By

1 proposing to arbitrate this issue, AT&T is effectively attempting an end-run
2 around the CCP and effectively excluding other ALECs that have a very
3 real interest in how the change control process works. Allowing AT&T to
4 succeed in this end run would result in AT&T's gaining an unfair
5 advantage over the parties that adhere to the process. Like the interfaces
6 themselves, the change control process is regional. Issues submitted to
7 the CCP must be dealt with by BellSouth and all of the eighty-three (83)
8 ALECs participating in CCP, not just BellSouth and AT&T.

9
10 Q. IN ITS PROPOSED RECOMMENDED ARBITRATION ORDER BEFORE
11 THE NORTH CAROLINA UTILITIES COMMISSION (DOCKET NO. P-
12 140, SUB 73 & P-646, SUB 7), WHAT IS THE RECOMMENDATION OF
13 THE NORTH CAROLINA PUBLIC STAFF RELATED TO ARBITRATION
14 OF THE CHANGE MANAGEMENT ISSUE?

15
16 A. On page 16 of its proposed recommended order, the North Carolina
17 Public Staff states that "this arbitration docket is an inappropriate forum for
18 consideration of wholesale modifications to the CCP or the CCP
19 document, as proposed by AT&T. . . . The CCP, an open forum of industry
20 technical experts, should bear the primary responsibility of debating the
21 merits of AT&T's proposed changes in OSS and working toward solutions
22 and compromises that are acceptable to AT&T, BellSouth, and the
23 industry as a whole." On page 17 of its proposed recommended order,
24 the Public Staff further recommends that "the Commission also concludes
25 that it should not mandate changes to the CCP or interim CCP document

1 in this arbitration docket without all of the interested CLPs [Competing
2 Local Providers] having ample opportunity to participate in these
3 discussions”.

4
5 Q. IF THIS COMMISSION SHOULD DETERMINE A SEPARATE CCP IS
6 REQUIRED FOR FLORIDA, HOW WOULD THIS DECISION AFFECT
7 THE CCP?

8
9 A. This is of major concern to BellSouth. The manual processes and
10 electronic interfaces implemented for the ALECs by BellSouth are regional
11 systems. And as I stated previously, the CCP is a regional, collaborative
12 process between BellSouth and the participating ALECs.

13
14 Since this issue is being arbitrated between BellSouth and AT&T in at
15 least eight states, conceivably BellSouth could be required to implement
16 separate change control processes for three, four, or even all eight states.
17 This would destroy the regional and collaborative nature of the CCP. The
18 decisions affecting the CCP are better left with the industry itself, the
19 participating ALECs and BellSouth. If the Commission does determine to
20 hear this issue, BellSouth respectfully submits that the Commission should
21 only give guidance on these issues, rather than order specific changes in
22 order to avoid the state-to-state conflicts I mentioned.

23
24 Q. IF THE COMMISSION SHOULD DETERMINE THAT IT WILL ALLOW
25 ARBITRATION OF THIS ISSUE, HOW IS YOUR TESTIMONY

1 ORGANIZED TO PRESENT BELLSOUTH'S POSITION ON THE
2 INDIVIDUAL SUB-ISSUES RAISED BY THIS DISPUTE?

3
4 A. Although BellSouth believes that this entire issue is inappropriate for
5 arbitration, BellSouth will address the issue as described by AT&T's
6 issues matrix. First, I will provide background on the change management
7 process. Then I will provide BellSouth's individual responses to items (a)
8 through (j) raised in issue 30.

9
10 Q. HOW WAS THE CCP DEVELOPED?

11
12 A. BellSouth established its original change management process, known as
13 the Electronic Interface Change Control Process ("EICCP"), to secure
14 input from the ALECs regarding future enhancements to existing
15 electronic ALEC interfaces, and to have an organized means of securing,
16 understanding and prioritizing the ALECs' requirements regarding these
17 interfaces. From the beginning of the EICCP's development, BellSouth
18 sought the participation of the ALECs, including AT&T. Discussions
19 began in October 1997 and AT&T was a member of the committee that
20 developed the process.

21
22 The GA PSC Staff ("Staff") conducted a Technical Workshop with
23 BellSouth and the interested ALECs on December 9-10, 1997 at which the
24 change management process was discussed. In its Recommendation
25 issued on December 12, 1997, as a result of the workshop, the Staff

1 recommended a change control process for electronic interfaces. The GA
2 PSC issued its order approving the staff recommendation on April 21,
3 1998. On May 15, 1998, the EICCP became effective and operational
4 throughout BellSouth's region.

5
6 Q. WHAT CATEGORIES DID THE ORIGINAL EICCP ENCOMPASS?

7
8 A. The original EICCP handled the following categories of changes: software,
9 hardware, industry standards, products and services, new or revised edits,
10 process, regulatory, and documentation.

11
12 Q. HAS THE ORIGINAL PROCESS BEEN ENHANCED?

13
14 A. Yes. BellSouth and the ALECs determined that the original EICCP
15 needed to be enhanced. Thus, a workshop on this subject was held on
16 February 16-17, 2000, and all participating ALECs were invited. This was
17 done so that all of the ALECs, not just one or two of them, could propose
18 changes to the plan. AT&T was the driving force behind the majority of
19 the changes proposed during the workshop. Following the workshop, a
20 draft revised Change Control Process document ("CCP document") was
21 distributed to the ALECs.

22
23 BellSouth conducted conference calls on February 29, 2000, and March
24 23, 2000, again with all participating ALECs invited, to review the
25 recommended CCP changes raised during the workshop and to follow-up

1 on any outstanding issues. Exhibit RMP-3 provides a copy of the February
2 29, 2000, Steering Committee Meeting minutes.

3
4 Q. PLEASE EXPLAIN HOW THE CHANGE MANAGEMENT PROCESS
5 WAS EXPANDED AS A RESULT OF THE WORKSHOPS AND
6 CONFERENCE CALLS.

7
8 A. At the first workshop, suggestions were made that the process be
9 expanded to include:

- 10 1) defect change requests, both documentation and software that are
11 BellSouth- and ALEC-initiated and ALEC affecting;
- 12 2) BellSouth-initiated enhancement requests that are ALEC-affecting
13 (ALEC-initiated enhancement requests are already included in the
14 existing process.);
- 15 3) BellSouth's escalation and defect notification processes;
- 16 4) formalization of escalation and defect notification processes;
- 17 5) definition of how the new processes will be incorporated into the
18 existing change control structure;
- 19 6) monthly status update meetings that are open to all ALECs;
- 20 7) new email process for system outages and defect notices.

21
22 Q. DID BELLSOUTH MAKE THESE ENHANCEMENTS?

23
24 A. Yes.

25

1 Q. DID BELLSOUTH CHANGE THE NAME AS A RESULT OF THE
2 WORKSHOPS AND CONFERENCES?

3

4 A. Yes. The name was changed from EICCP to Change Control Process
5 ("CCP") to reflect a broadened scope to include, among other changes,
6 manual processes in addition to the existing electronic interfaces.

7

8 Q. WHAT STEPS DID BELLSOUTH TAKE TO OBTAIN AN AGREEMENT
9 FROM THE ALEC PARTICIPANTS REGARDING THE CHANGES TO
10 THE CCP?

11

12 A. In an effort to obtain "sign-off" from the ALEC participants, BellSouth
13 posted the Change Control Process Interim Document ("Interim CCP") on
14 the website on March 22, 2000. In order to obtain concurrence from the
15 ALEC community within the BellSouth region, BellSouth posted Carrier
16 Notification Letter SN91081679 on the Interconnection Website on March
17 23, 2000 announcing the Interim CCP and requesting input from the ALEC
18 community by April 10, 2000. The Website address is:
19 <http://www/interconnection.bellsouth.com/carrier>. Exhibit RMP-4 provides
20 a copy of Carrier Notification Letter SN91081679.

21

22 Q. DID THE INDUSTRY REACH AN AGREEMENT TO IMPLEMENT THE
23 NEW CCP?

24

1 A. No. BellSouth attempted to gain approval of the CCP from the
2 participating ALECs. Even though all participants agreed that the EICCP
3 needed to be changed, industry approval was not obtained as to the
4 actual Interim CCP. However, the ALEC participants and BellSouth did
5 agree to a three-month trial period for the Interim CCP. The Interim CCP
6 became effective on April 17, 2000. BellSouth posted Carrier Notification
7 Letter SN91081733 to the website, on April 14, 2000, announcing
8 implementation of the Interim CCP on April 17, 2000 and directing the
9 ALECs to the new Interim CCP website. Exhibit RMP-5 is a copy of
10 Carrier Notification Letter SN91081733. The most recent version of the
11 BellSouth Change Control Process document, Version 2.0, dated August
12 23, 2000, is posted on the website at
13 http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.htm
14 (Exhibit RMP-2)

15
16 Q. WHAT ACTIONS HAVE BEEN TAKEN SINCE THE THREE-MONTH
17 TRIAL PERIOD ENDED?

18
19 A. The three-month trial period ended in July 2000. BellSouth alerted the
20 ALECs in the June 26, 2000 Monthly Status Call meeting that a vote
21 would be taken at the July 26, 2000 Monthly Status Call meeting.
22 However, the July 26 meeting lasted 3 hours, which was well over the
23 allotted time. As a result the CCP participants were not requested to vote
24 to establish the new "baseline" CCP document. Instead, BellSouth
25 indicated the vote would be taken at the next scheduled Monthly Status

1 Call meeting in August. During the August 23, 2000 Monthly Status Call
2 meeting the ALEC participants agreed by a vote of 6-3 to accept the new
3 "baseline" CCP document.

4
5 Exhibit RMP-6 is a copy of the June 26, 2000 Monthly Status Call minutes.
6 Exhibit RMP-7 is a copy of the August 23, 2000 Monthly Status Call
7 minutes.

8
9 Q. YOU STATED EARLIER THAT THERE ARE EIGHTY-THREE (83)
10 ALECS PARTICIPATING IN CCP. WHY WERE ONLY 9 PRESENT TO
11 VOTE ON THE CCP DOCUMENT?

12
13 A. As stated previously, eighty-three ALECs are registered as participants of
14 the change control process. Even though a meeting agenda is prepared
15 and distributed prior to each meeting, a review of our records for the
16 months March 2000 to October 2000 indicate an average of only ten
17 ALECs, with few exceptions, participate in the CCP meetings. From the
18 July 26, 2000 Monthly Status Call minutes attached in Exhibit RMP-8, it
19 can be seen that only a few ALECs are active in this process.

20
21 Q. WILL BELLSOUTH CONTINUE TO ENHANCE THE CHANGE CONTROL
22 PROCESS?

23
24 A. Yes. As previously discussed, change control is an ever-evolving process
25 and the approved CCP document is a "baseline, living" document.

1 BellSouth is committed to the change management process; and
2 therefore, will continue to consider input that will enhance the process to
3 best serve the ALEC community as a whole.

4
5 For instance, BellSouth has initiated a series of CCP Process
6 Improvement meetings denoted to improving the process. The first CCP
7 Process Improvement Meeting was conducted on October 17, 2000.
8 Among the items discussed during the Process Improvement meeting
9 were:

- 10
11 1) Revision history on Carrier Notifications related to documentation
12 updates/upgrades
- 13 2) Defect/Expedite Process
- 14 3) BellSouth Release Management milestones (Future Releases
15 schedule or calendar)
- 16 4) Coding Changes
- 17 5) BellSouth's internal process for scheduling prioritized change
18 requests
- 19 6) AT&T's suggested changes ("marked-up version") to CCP
20 Document Version 2.0

21
22 Exhibit RMP-9 provides a copy of the October 17, 2000 meeting minutes.
23 The second CCP Process Improvement Meeting was conducted on
24 November 1, 2000 and the next meeting is scheduled for December 7,
25 2000.

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A. HAS AT&T SUGGESTED CHANGES TO THE BELL SOUTH CCP DOCUMENT?

A. Yes. In an attempt to arbitrate this issue in other states, AT&T has filed suggested changes to the CCP document in the form of marked-up copies of various versions of BellSouth's CCP document. On April 27, 2000, AT&T filed a marked-up copy of the BellSouth CCP Interim Version 1.4 document in its Arbitration Proceeding before the North Carolina Public Utilities Commission. The Interim CCP Version 1.4 with AT&T's suggested changes was a 49-page document with proposed substantive changes on 18 pages. A copy of the CCP Interim Version 1.4 document with AT&T's Proposed Changes is provided in Exhibit RMP-10. Of AT&T's suggested changes, BellSouth agreed with the following changes suggested by AT&T:

- 1) Testing added to Process list (added page 7, version 2.0)
- 2) Broader definition of term "defect" (added page 11, version 2.0)
- 3) Three Impact Levels of High, Medium, and Low added to Type 6 Defect/Expedited Process (added page 25, version 2.0)
- 4) Conference call used to discuss Type 6 Workaround, if appropriate (added page 29, version 2.0)
- 5) Agreed to proposed Introduction of New Interfaces language provided that portion of BellSouth's language struck by AT&T remains in document

1
2 In an attempt to arbitrate this issue in the proceeding before the Georgia
3 Public Service Commission, AT&T filed a copy of BellSouth's CCP
4 Version 2.0 document with suggested changes, some of which differ from
5 the changes submitted to the North Carolina Public Utilities Commission.
6 The CCP Version 2.0 document with AT&T's suggested changes was
7 submitted to the Georgia Commission on September 22, 2000. The
8 document with AT&T's suggested changes is a 70-page document with
9 proposed substantive changes on 24 pages. The major topics for which
10 AT&T is currently requesting changes can be divided into the following
11 groups:

- 12 1) Training
- 13 2) Rejection/Cancellation/Reclassification of change requests
- 14 3) Sizing/sequencing of prioritized change requests
- 15 4) Defect/ Expedite Feature Change Process
- 16 5) Software Release Notification schedule
- 17 6) Dispute Resolution Process
- 18 7) Changes to Process
- 19 8) Escalation Process
- 20 9) Testing

21
22 Additionally, AT&T submitted a CCP Change Request, Log # CR0171, on
23 September 9, 2000 requesting that the BellSouth "baseline" CCP
24 document be modified to include the changes outlined in AT&T's marked-
25 up CCP Version 2.0 document. AT&T's marked-up CCP Version 2.0

1 document was discussed during the CCP Process Improvement Meeting
2 conducted on October 17, 2000. It was decided that a sub-team was
3 needed to review and discuss AT&T's proposed changes and to get other
4 ALEC participants' input and concerns. AT&T's CCP representative will
5 facilitate the sub-team with the ALEC participants and BellSouth in
6 attendance. A copy of the AT&T Change Request including the CCP
7 Interim Version 2.0 document with AT&T's Proposed Changes is provided
8 in Exhibit RMP-11.

9
10 In summary, while AT&T is attempting to arbitrate these proposed
11 changes to the CCP before this Commission, AT&T is also actively using
12 the CCP in an effort to make these changes. As discussed previously, the
13 CCP was established through collaboration between interested ALECs
14 and BellSouth. The changes submitted through this process are handled
15 collaboratively by the participating ALECs and BellSouth. Therefore, the
16 CCP utilizing input from the CCP Process Improvement Sub-Team is the
17 appropriate forum for review and acceptance or rejection of the CCP
18 changes suggested by AT&T.

19
20 Q. WHAT INTERFACES ARE COVERED BY THE CCP?

21
22 A. The CCP covers change requests for the LENS, TAG, EDI, TAFI, ECTA,
23 and CSOTS electronic interfaces and the associated manual processes
24 that have the potential to impact the ordering, pre-ordering and

1 maintenance and repair functions utilized by BellSouth and the ALECs
2 connected to BellSouth's interfaces.

3
4 Q. WHAT TYPES OF CHANGES DOES THE CCP HANDLE?

5
6 A. The CCP handles the following types of changes:

- 7 1) Software
- 8 2) Hardware
- 9 3) Industry standards
- 10 4) Products and Services (i.e., new services available via the in-scope
11 interfaces)
- 12 5) New or revised edits
- 13 6) Process (i.e., electronic interfaces and manual processes relative to
14 order, pre-order, maintenance and testing)
- 15 7) Regulatory
- 16 8) Documentation (i.e., business rules for electronic and manual
17 processes relative to order, pre-order, maintenance)
- 18 9) Defects/expedites

19
20 Q. WHAT IS NOT INCLUDED UNDER THE CCP?

21
22 A. As documented in the CCP, the CCP does not include the following:
23 BonaFide Requests ("BFR"), production support, contractual agreement
24 issues, collocation, testing support, and help desk type issue resolution

1 questions. Change requests of this nature will be handled through
 2 existing processes.

3
 4 Q. HOW ARE THESE EXCLUDED ITEMS HANDLED?

5
 6 A. BellSouth's Interconnection Account Team handles contractual agreement
 7 issues, testing support, BFR, and collocation. The BellSouth Customer
 8 Service Manager or Account Team handles issues related to production
 9 support and issue resolution.

10
 11 Q. TURNING TO THE ACTUAL OPERATION OF THE CCP, HOW ARE
 12 CHANGE REQUESTS CLASSIFIED IN THE CCP?

13
 14 A. Pursuant to the CCP, all change requests are classified by type. The
 15 definition of each type and the process flow for each (including the
 16 intervals) are detailed in the CCP referenced above. The following table
 17 summarizes the types.

18

Type	Name
Type 1	System Outage
Type 2	Regulatory Change
Type 3	Industry Standard Change
Type 4	BellSouth-initiated Change
Type 5	CLEC-initiated Change
Type 6	CLEC-impacting Defects

19

1

2 Q. CAN YOU EXPLAIN THE DIFFERENT CHANGE REQUEST TYPES?

3

4 A. Yes. Even though not specifically stated as such in the CCP, the six types
 5 can be sub-divided into three distinct categories. These categories are
 6 represented in the CCP document as three separate, distinctive process
 7 flows. The following table summarizes the categories:

8

Category	Type	Description
Category 1	Type 1	System totally unusable or degradation in existing feature or functionality
Category 2	Types 2- 5	Change requests for system enhancements, manual and/or business processes, can also include issues for pre-order, orders, maintenance/repair
Category 3	Type 6	ALEC impacting defect in production - system not operating as specified in baseline business requirements or published business rules, includes documentation defects Expedited Feature – inability for ALEC to process certain types of orders to BellSouth because of problem on BellSouth’s side of interface.

9

10

11 Q. PLEASE PROVIDE AN EXPLANATION OF A CATEGORY 1 CHANGE
 12 REQUEST.

13

14 A. Category 1 covers the processes that are used in the event of a system
 15 outage to report, resolve, and communicate information regarding the
 16 outage in an expeditious fashion. These processes are used to keep all

1 system users informed about a specific situation. Category 1 issues are
2 included in the CCP so that if there are to be changes in the identification,
3 notification and resolution process, the ALECs and BellSouth will jointly
4 develop how these changes will be made.

5
6 Category 1 involves a situation where an electronic interface is totally
7 unusable. That is, the ALECs' pre-order, order or maintenance/repair
8 reports cannot be submitted or will not be received by BellSouth. In this
9 situation, processes are in place to identify the problem, notify those
10 affected, and provide statuses regarding the resolution of the problem.
11 The CCP deals with proposed changes in the processes.

12
13 To make this clearer, let me describe the current processes involved with
14 a system outage. Either BellSouth or the ALEC can originate notification
15 of an outage. If an ALEC originates the notice, the ALEC reports it via a
16 telephone call to BellSouth's Electronic Communications Support ("ECS")
17 help desk. The ECS records and tracks the outage report and works to
18 resolve the outage. If the outage is not resolved within 20 minutes of
19 ECS receiving the report, the ALEC community is notified of the outage
20 via a notification placed on BellSouth's CCP website.

21 http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.html

22
23 Exhibit RMP-12 is a screen snapshot from the website for Type 1 System
24 Outages. In addition, an e-mail is sent to the ALECs participating in the
25 CCP. The ALEC industry is notified on two to four hour intervals until the

1 resolution is determined. A resolution determination is posted to the CCP
 2 website within 24 hours of the outage being reported to the ECS. The
 3 final resolution is posted to the CCP website within three days of the
 4 outage being reported. The escalation process may be utilized for the
 5 status notification, resolution notification, or final resolution notification
 6 steps if the time frames are not met and/or the responses are not
 7 satisfactory.

8 Following is an example of a Category 1 outage reported to BellSouth:
 9

Initial Notification	Status Notification	Resolution Notification	Final Resolution
1. ECS received report of outage from CLEC on 5/19/00 at 9:47am. 2. CLEC advised internally performed outage resolution activities. 3. CLEC provided trouble description "Security 2207 process is hung on TAG box 90.70.124.148". 4. ECS assigned case # 421221, class 1at 9:54. 5. ECS internally reports trouble at 9:56/9:57.	6. ECS receives internal report on status of trouble at 9:59.	7. ECS receives notification that internal report trouble is cleared 5/19/00 at 10:00	8. Posted final resolution notification TAG 2207 System Outage #1105 on CCP website at 10:08. Duration shown on website 9am to 10am. 9. 10:09 Sent TAG Trouble email, closing ticket. 10. Ticket closed 10:09.

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Q. PLEASE PROVIDE AN EXPLANATION OF A CATEGORY 3 CHANGE REQUEST.

A. A category 3 defect (I will come back to category 2) involves a situation where an interface is working but not in accordance with the way it was designed or in accordance with the business rules published by BellSouth to the ALECs. Category 3 has recently been expanded and now also includes expedited features, which includes problems that result in the inability of an individual ALEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. BellSouth calls these situations a defect/expedite feature. The defect/expedite feature is the underlying problem, and what are covered by the CCP are the identification, notification, and resolution processes for defects/expedite features.

Defects/expedite features have the following three Impact Levels:

- 1) High Impact – failure causes impairment of critical system functions and no electronic workaround solution exists. Expedited features are treated as High Impact.
- 2) Medium Impact – failure causes impairment of critical system functions; a workaround solution does exist
- 3) Low Impact – failure causes inconvenience or annoyance

1 The process, which provides for speedy treatments of defects, is as
2 follows. The identification of the type 6 defect/expedite can be initiated by
3 BellSouth or the ALECs. The originator and the individual ALEC's Change
4 Control Manager ("CCCM") or the BellSouth Change Control Manager
5 ("BCCM") prepare the change request form with the related requirements
6 and specification attached if appropriate, i.e. Purchase Order Number,
7 Operating Company Name, interfaces affected, error messages, etc. The
8 request should also include a description of the business need and details
9 of the business impact. The request is submitted to BellSouth via e-mail.
10 Within one business day of receiving the change request, the BCCM will:

- 11
- 12 1) Log the defect/expedite in the change request log;
- 13 2) Send acknowledgement to ALEC;
- 14 3) Review for completeness and accuracy;
- 15 4) Assign defect/expedite status;
- 16 5) Send clarification notification via e-mail to originator if appropriate.
- 17

18 Within the next three business days, the BCCM

- 19 1) Validates request is a defect/expedite;
- 20 2) Perform internal defect/expedite analysis;
- 21 3) Determine appropriate status;
- 22 4) Sends defect/expedite notification to ALEC community via e-mail;
- 23 4) Posts defect/expedite on CCP website.
- 24

25 Within the next 4 business days, the BCCM will:

- 1) identify a defect workaround;
- 2) Send work around process to originator via e-mail;
- 3) Alert ALEC community via e-mail and;
- 4) Post the work around process on CCP website or, if appropriate, notify via conference call;
- 5) Update request on change control log.

Importantly, with a category 3 defect, the interface is working, but not in accordance with the BellSouth baseline business requirements or in accordance with BellSouth published business rules and is impacting an ALECs ability to exchange transactions with BellSouth. This includes documentation defects.

The BCCM will provide a status of the defect/expedite at the Monthly Status Meeting and solicit ALEC and BellSouth input if appropriate. The BCCM will schedule and evaluate the defect/expedite based on the business impacts and capacity.

BellSouth will use its best efforts to schedule expedite features in the current release, next release or point release. BellSouth will utilize its best efforts to implement High Impact "validated" defects within a 4 – 25 business day range.

I do want to note that BellSouth has changed its definition of what constitutes a defect, based on its reevaluation of its previous definition

1 during the recent North Carolina proceedings with AT&T. As previously
2 stated, the defect notification process was also recently expanded to
3 include expedited features. BellSouth believes that these changes in the
4 definition of "defect" and the addition of a new category of "expedited
5 features" will help substantially in resolving issues with AT&T related to
6 this subject.

7
8 I also want to explain BellSouth's position on the time frames in which an
9 activity will be concluded, since that inevitably is an issue with AT&T.
10 BellSouth has proposed time frames for all of these activities that
11 BellSouth believes, based on its experience, to be reasonable "outside"
12 time limits. BellSouth intends, whenever a time frame is set out for
13 accomplishing a particular step in a process, of accomplishing that step as
14 quickly as possible. If a step takes 20 minutes and a full business day is
15 allotted, the step will take 20 minutes. The problem with all of this is that
16 while we are attempting to categorize problems into neat little
17 pigeonholes, that rarely will be the case. Some problems will take longer
18 than others to resolve, hence the use of outside time frames for the steps.

19
20 Q. PLEASE EXPLAIN HOW A PROPOSED CHANGE REQUEST FOR
21 CATEGORY 2 WOULD BE HANDLED.

22
23 A. Category 2 is a situation where a change request is submitted to enhance
24 systems, manual and/or business processes. Significantly, Category 2
25 doesn't involve a system failure or a system that isn't working the way it is

1 suppose to work. An ALEC or BellSouth can determine the need for and
2 originate a category-2 change request. The originator, in conjunction with
3 either the BCCM or the CCCM, submits the change request and the
4 appropriate documentation to BellSouth via e-mail. These change
5 requests follow a normal course of business utilizing the CCP. In other
6 words, these change requests are not treated in an expedited manner.
7 Instead, each is thoroughly assessed and presented to participating
8 members of the CCP at scheduled meetings for input and prioritization.
9 The process flow as documented in the CCP is described below.

10
11 Within two to three days of receipt of the change request, the BCCM takes
12 the following action:

- 13 1) Logs the request in change control log;
- 14 2) Sends an acknowledgement to the originator via e-mail;
- 15 3) Reviews change request for completeness and accuracy;
- 16 4) Assigns change request status code;
- 17 5) if appropriate, sends clarification to originator via e-mail.

18
19 Within the next twenty days, the BCCM performs the following activities:

- 20
21 1) Reviews change request and related documentation for content;
- 22 2) Review for impacted areas, such as system, manual process,
23 documentation and adverse impacts;
- 24 3) BellSouth may reject the request based on reasons such as, cost,
25 industry direction, or technically not feasible to implement;

- 1 4) If rejected, notification provided to originator;
- 2 5) If rejected, reason shared with ALECs for input;
- 3 6) If rejected and if requested, subject matter expert ("SME") available
- 4 in Monthly Status Meeting to discuss reason and alternatives;
- 5 6) Posts appropriate status on change control log.

6
7 Both the BCCM and CCCM, within the next five to seven (5-7) days,
8 prepare for the Change Review Meeting. The BCCM performs the
9 following:

- 10 1) Prepares agenda;
- 11 2) Makes meeting preparations;
- 12 3) Updates current request status on change control log;
- 13 4) Prepares and posts change control log to CCP website.

14
15 The CCCM performs the following:

- 16 1) Analysis pending requests;
- 17 2) Determine priorities for change requests and establish desired/want
- 18 dates;
- 19 3) Create draft priority list.

20
21 The pending change request is reviewed during the Monthly Status
22 Meeting.

23
24 During the Prioritization Meeting, which is conducted as needed based on
25 the published release schedule, the change requests are reviewed,

1 initiators present the change requests, impacts are discussed, requests
2 are prioritized, and the final list of prioritized change requests, also known
3 as the final Candidate Requests list, is developed.

4
5 Within two days of the Monthly Status/Prioritization meeting, the current
6 status of the request is updated on change request log, the meeting
7 results prepared and the log and results are posted on the CCP website.

8
9 During the next thirty (30) days, BellSouth and the ALECs perform
10 analysis, impact, sizing, and estimating activities for the prioritized items.
11 During this process BellSouth provides requirements and the technical
12 references to the ALECs. Additionally, face-to-face meetings, or
13 conference calls or both are held by BellSouth and the ALECs to discuss
14 the programming and coding details for the changes.

15
16 The next step is the Release Package Meeting. During the meeting, the
17 parties evaluate the proposed release schedule and BellSouth and the
18 ALECs jointly create the Approved Release Package. The non-scheduled
19 change requests are determined and returned to the next scheduled
20 Change Review Meeting. The date of the initial Release Management
21 Project Meeting is established.

22
23 Within two days of the Release Package Meeting the following meeting
24 documentation is released.

25 1) Approved Release Package;

- 1 2) Updated Change Request Log;
- 2 3) Meeting minutes;
- 3 4) Date for initial Release Management Project Meeting.

4

5 Q. NOW THAT YOU HAVE DESCRIBED THE PROCESS FOR HANDLING
6 THE CATEGORY 2 CHANGE REQUESTS, PLEASE DESCRIBE HOW
7 THE CHANGES ARE IMPLEMENTED?

8

9 A. A Category 2 change to an electronic interface is usually "packaged" with
10 other changes or enhancements to be implemented together in a release.
11 The releases require programming by both the ALECs and BellSouth.

12

13 Q. WHEN DOES BELL SOUTH SEND A FORMAL CARRIER NOTIFICATION
14 LETTER OF AN APPROVED INTERFACE CHANGE TO ALL OF THE
15 ALECS?

16

17 A. BellSouth formally notifies ALECs of the changes comprising a major
18 release of the electronic interfaces thirty (30) days in advance of
19 implementation. It is important to remember that, long before ALECs are
20 formally notified about changes to the interfaces, the potential changes
21 are first discussed with the participating ALECs during the CCP meetings.
22 All notification letters for 1997-2000 may be reviewed at the
23 Interconnection Website.
24 <http://www.interconnection.bellsouth.com/markets/lec.html>

25

1 Q. WHAT IS CONTAINED IN THE NOTIFICATION LETTERS TO THE
2 ALECS?

3

4 A. The notification letters are intended to summarize the changes being
5 implemented with a particular release and to identify possible "down time"
6 for the impacted interface(s) due to system loading requirements for the
7 release. These letters are not intended to be technical references for use
8 by ALEC software developers. As discussed previously, BellSouth
9 provides ALECs with this information through other sources well in
10 advance of the formal notification.

11

12 a) **INTRODUCTION OF NEW INTERFACES**

13 Q. NOW LET'S TURN TO THE SUB-ISSUES RAISED IN AT&T'S ISSUES
14 MATRIX, BEGINNING WITH THE INTRODUCTION OF NEW
15 INTERFACES. DOES THE CCP INCLUDE PROCESSES FOR THE
16 INTRODUCTION OF NEW INTERFACES?

17

18 A. Yes. The CCP contains the process for the introduction of new interfaces.
19 The process is described on page 35 of the CCP document (Exhibit RMP-
20 2). For the introduction of new interfaces, the document states:

21

BellSouth will introduce new interfaces to the CLEC

22

Community as part of the Change Control Process. A

23

description of the proposed interface will be submitted to the

24

BCCM [BellSouth Change Control Manager]. The BCCM

25

will add an agenda item to discuss the new interface at the

1 monthly status meeting. BellSouth will be given 30–45
2 minutes to present information on the proposed interface. If
3 BellSouth requests additional time for the presentation, a
4 separate meeting will be scheduled . . . The objective will be
5 to identify interest in the new interface and obtain input from
6 the CLEC community. BellSouth will provide specifications
7 on the interface being developed to the CLEC Community.

8
9 Thus, the CCP provides BellSouth and the ALECs with a meaningful
10 opportunity to discuss and provide input for the proposed new interfaces.
11 I do want to make it clear, however, that while the introduction of new
12 interfaces is clearly subject to the CCP; the development of new interfaces
13 is not.

14
15 Q. WHEN DOES A NEW INTERFACE BECOME SUBJECT TO THE CCP?

16
17 A. As documented on page 35 of the CCP, new interfaces are added to the
18 CCP as they are deployed. After that, any requested changes will be
19 managed by the CCP.

20
21 Q. WHY DO INTERFACES UNDER DEVELOPMENT NOT FALL UNDER
22 THE CCP?

23
24 A. BellSouth must have flexibility to develop interfaces to meet industry
25 standards and regulatory requirements. The process allows for and

1 encourages ALEC input, but new development is too critical to risk being
2 stymied in the process by ALEC disagreement. To ensure efficient and
3 up-to-date deployment of new interfaces, BellSouth must retain ultimate
4 control of their deployment.

5
6 Q. DOES AN ALEC HAVE TO BE A USER OF AN INTERFACE IN ORDER
7 TO USE THE CCP?

8
9 A. No. An ALEC may place a "letter of intent", indicating that it intends to use
10 an interface, on file with the BellSouth Change Control Management. The
11 letter of intent will serve as the official notification to BellSouth and the
12 other ALEC CCP participants that the ALEC's intention is to use the
13 interface. By doing this the ALEC will be permitted to participate in the
14 submission and prioritization of change requests for that interface. This
15 enhancement is reflected in the CCP document Version 2.0.

16
17 Therefore, one of the parameters of the CCP is that an ALEC must be a
18 user of an interface or have a letter of intent on file to request changes to
19 that interface. Since part of the CCP is prioritizing potential changes to an
20 interface, it just makes sense that an ALEC must be a user of an interface
21 or have a letter of intent in order to vote and rank the potential change(s)
22 for that particular interface. This simply recognizes that the ALECs that
23 are either currently using or have officially provided their intention to use
24 these interfaces should have the first say on how the interfaces should be
25 changed. The specific prioritization voting rules are detailed in the CCP

1 document (page 33 of Exhibit RMP-2). Unfortunately, the nature of the
2 CCP is such that if developing interfaces were included in the CCP,
3 ALECs with no intention of using such interfaces could game the process
4 by voting for additional features and functionality that would increase the
5 time and the cost to BellSouth and rival ALECs to implement them.

6
7 **b) RETIREMENT OF EXISTING INTERFACES**

8 Q. IS THE RETIREMENT OF EXISTING INTERFACES SUBJECT TO THE
9 CCP?

10
11 A. No. But, based upon the discussions with interested ALEC participants,
12 language has been added to ensure that BellSouth only retires interfaces
13 that are not being used, or if BellSouth has a replacement for an interface
14 that provides equal or better functionality for the ALEC than the existing
15 interface.

16
17 Information on the retirement of interfaces is located on page 35 of the
18 CCP document (Exhibit RMP-2). It states as follows:

19 As active interfaces are retired, BellSouth will notify the
20 CLECs through the Change Control Process and post a
21 CLEC Notification Letter to the web six (6) months prior to
22 the retirement of the interface. BellSouth will have the
23 discretion to provide shorter notifications (30-60 days) on
24 interfaces that are not actively used and/or have low
25 volumes. BellSouth will consider a CLEC's ability to

1 transition from an interface before it is scheduled for
2 retirement. BellSouth will ensure that its transition to another
3 interface does not negatively impact a CLEC's business.

4
5 BellSouth will only retire interfaces if an interface is not being
6 used, or if BellSouth has a replacement for an interface that
7 provides equal or better functionality for the CLEC than the
8 existing interface.

9

10 Q. WHY IS THIS POLICY REASONABLE?

11

12 A. BellSouth is responsible for providing ALECs with the required OSS
13 functionality. Operational reasons, such as discontinued hardware,
14 software that cannot be upgraded, or lack of use, are legitimate business
15 reasons for retiring interfaces. If retirement were included in change
16 control, ALECs could vote to maintain obsolete or unused interfaces
17 simply to game the system. BellSouth should not be forced to carry the
18 unnecessary costs of maintaining obsolete or unused systems and
19 indeed, this is not in the ALECs' interest either because the OSS costs
20 would be passed to them.

21

22 Q. WHAT PRECAUTIONS WILL BELLSOUTH TAKE TO ENSURE THAT
23 THE RETIREMENT OF AN INTERFACE IS NOT DETRIMENTAL TO
24 ALECS?

25

1 A. It is not BellSouth's intent to take an interface out of service that would
2 have a detrimental impact on the ALEC community. BellSouth will take an
3 interface out of service only if the interface is not being used, or if
4 BellSouth has a replacement for an interface that provides equal or better
5 functionality for the ALEC than the existing interface. Furthermore, upon
6 giving notification that an interface is going to be taken out of service,
7 BellSouth will remain open to input from ALECs concerning its decision to
8 retire the interface in question. When it is determined appropriate to retire
9 an interface, BellSouth will ensure that the functionality provided by that
10 interface is available via another means and provide a mechanism to
11 assist in the ease of transition.

12

13 **c) EXCEPTIONS TO THE PROCESS**

14 Q. WHAT IS YOUR UNDERSTANDING OF THIS ISSUE?

15

16 A. AT&T's apparent desire to put "exceptions" to the process under the
17 process is difficult to understand. Evidently, in spite of everything
18 BellSouth has just been discussing regarding the CCP, AT&T wants a
19 process that allows them to simply circumvent the entire CCP.

20

21 **d) DOCUMENTATION, INCLUDING TRAINING**

22 Q. IS DOCUMENTATION INCLUDED UNDER THE CCP?

23

24 A. Yes. Documentation is one of the categories that is included under the
25 CCP, as I described in my introductory remarks about Issue 30.

1 Additionally, documentation defects have been incorporated in the
2 defect/expedite feature definition. Specifically, the documentation
3 included in this process is the business rules for electronic and manual
4 processes relative to pre-ordering, ordering, and maintenance.

5
6 It is not clear why AT&T thinks training should fall under the CCP.
7 BellSouth is responsible for the development and delivery of all ALEC's
8 training including related training material and aids. Of course, the training
9 courses that support the interfaces that fall under the CCP will be adapted
10 as the interfaces are enhanced through the process.

11
12 Interested ALECs and BellSouth, through collaboration, developed an
13 adequate and thorough process for dealing with documentation. The
14 issue here apparently is AT&T's desire to circumvent the collaborative
15 nature of the process. If AT&T wishes to make changes regarding
16 documentation, it should submit them to the CCP.

17
18 **e) DEFECT CORRECTION and**

19 **f) EMERGENCY CHANGES (defect correction)**

20 **Q. CAN YOU DISTINGUISH THESE TWO ISSUES?**

21
22 **A. Quite frankly, AT&T's point in separating these two is not clear. A dispute**
23 **existed about the definition of a defect and that may have given rise to this**
24 **sub-issue. I believe the disagreement of the definition of a defect has**
25 **been resolved.**

1

2 Q. HOW ARE DEFECTS DEFINED UNDER THE CCP?

3

4 A. The definition of defects has been revised. The revised language as
5 stated on page 25 of the CCP document is as follows:

6 Any non-type 1 change where a BellSouth interface used by
7 a CLEC which is in production and is not working in
8 accordance with the BellSouth baseline business
9 requirements or is not working in accordance with the
10 business rules that BST has published or otherwise provided
11 to the CLECs and is impacting a CLECs ability to exchange
12 transactions with BellSouth. This includes documentation
13 defects.

14

15 This revised definition incorporates language to deal with concerns
16 expressed by AT&T. Specifically, the part of the definition, which states
17 "is not working in accordance with business rules to exchange
18 transactions with BellSouth." A defect to documentation or business rules
19 is a condition where the documentation or business rule does not agree or
20 accurately reflect the business environment.

21

22 Q. HOW ARE DEFECTS HANDLED BY THE CCP AND BELLSOUTH?

23

24 A. BellSouth is committed to responding to all requests in the manner set
25 forth in the CCP. A workaround will be provided, in most cases, no more

1 than (4) business days after validation of the existence of a defect. Since
2 BellSouth has incorporated this process, BellSouth has actually provided
3 workarounds within three (3) business days. BellSouth works diligently to
4 provide a response/workaround as quickly as possible. Defect fixes,
5 depending upon the system/customer impacts, are generally implemented
6 in point releases, which means a quicker turnaround for the ALEC.

7
8 Q. WHAT DO YOU BELIEVE TO BE THE ISSUE HERE?

9
10 A. AT&T takes exception, evidently, to our definition of a defect. Hopefully,
11 this has been resolved.

12
13 Q. IS DEFINING A PROBLEM AS A DEFECT OR A NON-DEFECT
14 IMPORTANT?

15
16 A. Yes. If it is a defect, it gets the category-3 treatment described earlier. If it
17 is just something AT&T doesn't like, but does not rise to the level of a
18 defect, it gets category-2 treatment.

19
20 **g) *an eight-step cycle, repeated monthly***

21 Q. DOES BELLSOUTH UNDERSTAND WHAT IS AT ISSUE HERE?

22
23 A. No. As discussed previously, AT&T has filed suggested changes to the
24 CCP document in the form of marked-up copies of various versions of
25 BellSouth's CCP Document. AT&T has not deleted any steps in the

1 process flows in these marked-up versions of the CCP document.

2 Therefore, BellSouth does not understand this issue.

3
4 **h) A FIRM SCHEDULE FOR NOTIFICATIONS ASSOCIATED WITH**
5 **CHANGES INITIATED BY BELL SOUTH**

6 Q. DOES THE CCP PROVIDE A "FIRM SCHEDULE" FOR NOTIFICATIONS
7 ASSOCIATED WITH BELL SOUTH-INITIATED CHANGES?

8
9 A. Yes. The schedule is outlined on page 20 of the CCP document (Exhibit
10 RMP-2), with a detailed description of the process flow for BellSouth-
11 initiated changes on pages 19-24.

12
13 Q. BECAUSE THE CCP CONTAINS A SCHEDULE FOR NOTIFICATIONS,
14 DOES BELL SOUTH UNDERSTAND WHY THIS IS AT ISSUE?

15
16 A. No. We conclude that AT&T is simply unhappy with the schedule
17 established through collaboration by ALECs and BellSouth operating
18 under change control, and that AT&T is attempting to circumvent the
19 collaborative nature of the process through this arbitration. If AT&T
20 wishes to make changes regarding the scheduling of notification, it should
21 submit its proposed changes to the CCP.

22
23 Q. IS BELL SOUTH COMMITTED TO USING THE CCP TO INITIATE
24 CHANGE REQUESTS?

25

1 A. Yes, of course. BellSouth is committed to using the process to initiate
2 change requests, and, in fact, has already submitted requests. Several
3 other BellSouth-initiated change requests are being prepared for
4 submission.

5

6 ***j) A PROCESS FOR DISPUTE RESOLUTION INCLUDING REFERRAL TO***
7 ***STATE UTILITY COMMISSIONS OR COURTS***

8 Q. DOES THE CCP INCLUDE DISPUTE RESOLUTION?

9

10 A. Yes. A dispute resolution process was established as part of the
11 expansion of the CCP, and a description is contained in the CCP
12 document on page 40. In brief summary, the process is as follows: In the
13 event that an issue is not resolved through the CCP's escalation process,
14 BellSouth and the affected ALEC (or ALECs) will form a Joint Investigative
15 Team of Subject Matter Experts within one week. The team will conduct a
16 root cause analysis to determine the source of the problem, and then
17 develop a plan to remedy it. Each party to the dispute must escalate the
18 issue within each company to the person with the authority to resolve the
19 issue.

20

21 Q. IF THE DISPUTE CANNOT BE RESOLVED AFTER ALL THESE STEPS,
22 THEN WHAT OPTIONS ARE AVAILABLE?

23

24 A. As stated in the CCP document (Exhibit RMP-2) on page 40, if the dispute
25 cannot be resolved after these steps, then either party may file a formal

1 complaint for binding mediation with the Director of Telecommunications,
2 or the appropriate department, at the state public service commission.
3 According to the CCP, the complaint should be ruled upon within thirty
4 (30) days of the filing, although we obviously recognize that this is solely
5 within the Commission's discretion. If either party is then aggrieved, it
6 may file a formal complaint with the state public service commission. It
7 should be noted that this language has been introduced as part of the
8 Interim CCP. We recognize, however, that this language may require
9 refinement in order to be appropriate for Florida.

10
11 ***j) A PROCESS FOR ESCALATION OF CHANGES IN PROCESS***

12 Q. DO YOU UNDERSTAND WHAT IS AT ISSUE HERE?

13
14 A. No. An adequate and thorough escalation process was developed
15 through collaboration between interested ALECs and BellSouth, and
16 therefore is included in the CCP and contained in the CCP document. It is
17 not clear if there is truly an issue here.

18
19 Q. PLEASE DESCRIBE THE CCP'S ESCALATION PROCESS.

20
21 A. The guidelines for the escalation process are on page 33 of the CCP
22 document (Exhibit RMP-2). The CCP document provides as follows:
23 • The ability to escalate is left to the discretion of the ALEC based on
24 the severity of the missed or unaccepted response/resolution.

- 1 • Escalations can involve issues related to the Change Control
2 process itself.
- 3 • For change requests, the expectation is that escalation should
4 occur only after normal Change Control procedures (e.g.
5 communication timelines) have occurred per the Change Control
6 agreement.

7

8 The contacts and the processes for each type of change request are
9 located on pages 34-36. To summarize:

10 Type 1 change requests (System Outages) would be escalated
11 through three levels of the Electronic Communications Support
12 Group-Interconnection Operations by the ALEC.

13 Type 2-6 change requests would be escalated through the Change
14 Control Team who would direct Business Rules, Operation Issues,
15 and System Issues to the appropriate Director within BellSouth.

16

17 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 30.

18

19 A. I will summarize Issue 30 as follows:

20

- 21 1) The CCP is a collaborative process between interested ALECs,
22 including AT&T, and BellSouth. The changes submitted through
23 this process, including AT&T's suggested changes to the CCP
24 Version 2.0 document, are handled collaboratively by the
25 participating ALECs and BellSouth and as such,

- 1 2) Issue 30 is not appropriate for this arbitration.
- 2 3) The CCP utilizing input from the CCP Process Improvement Sub-
- 3 Team is the appropriate forum for review and acceptance or
- 4 rejection of the CCP changes suggested by AT&T.
- 5 4) This Commission should approve the change control process, or
- 6 5) This Commission should limit themselves to providing guidance to
- 7 BellSouth and the participating ALECS.

8

9

10 ***Issue 31: What should be the resolution of the following OSS issues***

11 ***currently pending in the change control process but not yet***

12 ***provided?***

13

14 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

15

16 A. As stated earlier, BellSouth's position is that the CCP, and therefore any

17 issues pending before the CCP, are not appropriate for this arbitration. All

18 requests for enhancements to BellSouth's electronic and manual

19 interfaces should be submitted via the CCP. As I stated in Issue 30

20 above, the CCP is a collaborative process established between BellSouth

21 and interested ALECs to manage changes to interfaces. OSS issues

22 submitted to the CCP must be dealt with by BellSouth and all of the

23 ALECs participating in CCP, not just BellSouth and AT&T. Moreover,

24 should the Commission decide to consider these topics, BellSouth

25 requests that the Commission only give guidance on these issues, rather

1 than requiring a result that may be in conflict with a decision in another
2 state.

3
4 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
5 THIS ISSUE?

6
7 A. As BellSouth understands AT&T's position, AT&T is attempting to
8 circumvent the CCP for the issues described in Issue 30. This would allow
9 AT&T to gain an unfair advantage over the other ALECs that adhere to the
10 regional CCP.

11
12 Q. WILL BELLSOUTH PROVIDE THE STATUS OF EACH REQUEST
13 LISTED IN ISSUE 31, EVEN THOUGH THE ISSUE IS NOT
14 APPROPRIATE FOR THIS ARBITRATION?

15
16 A. Yes. Although we do not think it appropriate to resolve in this proceeding,
17 I will address each item AT&T included in its position statement. AT&T
18 divided this issue into sub-parts (a) - (c). I will address each of the items
19 listed in the same manner.

20
21 **Sub-part (a) Parsed Customer Service Records ("CSR") for Pre-ordering**

22 Q. WHAT DOES PARSE MEAN?

23
24 A. To parse means to receive a stream of data from the CSR and break
25 down that data into certain fields for further use.

1

2 Q. WHAT HAS THE FCC SAID ABOUT AT&T'S INTERPRETATION OF THE
3 BELL ATLANTIC ORDER AS IT RELATES TO PARSING?

4

5 A. In its Southwestern Bell Texas order, footnote 413, the FCC stated that
6 "Contrary to AT&T's interpretation of the *Bell Atlantic New York Order*, see
7 AT&T Texas I Dalton/DeYoung Decl. At para. 95, we have not previously
8 stated that a BOC must perform parsing on its side of the interface."

9

10 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF WHAT THE ALECS,
11 INCLUDING AT&T, REFER TO AS A PARSED CSR?

12

13 A. Based on BellSouth's understanding, the ALECs, including AT&T, are
14 referring to the level to which the CSR information is provided for parsing
15 in the TAG pre-ordering interface. AT&T wants "sub-line" parsing of the
16 CSR data to a level that goes beyond the level used and retained by
17 BellSouth for itself. BellSouth currently provides the ALECs a stream of
18 data via the machine-to-machine TAG pre-ordering interface based on the
19 Common Object Request Broker Architecture ("CORBA") industry
20 standard. The stream of data is identified by section with each line
21 uniquely identified and delimited. This data is provided to ALECs in the
22 same manner as it is to BellSouth's Retail units.

23

24 BellSouth, for example, retains the customer's listed name as a complete
25 field - my listed name is "Pate, Ronald M". AT&T apparently wants "sub-

1 line” parsing of “Pate, Ronald M” into three separate fields: last name
2 (“Pate”), first name (“Ronald”), and middle initial (“M.”). This level of
3 parsing can be programmed by AT&T on its side of the interface. The
4 bottom line is that BellSouth provides ALECs with the CSR information in
5 a non-discriminatory format. BellSouth, therefore, has met its obligations
6 regarding parsing.

7
8 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
9 SUB-PART A OF THIS ISSUE?

10
11 A. In its petition and exhibits, AT&T claims that BellSouth should provide a
12 parsed CSR pursuant to industry standards. AT&T further claims the
13 parsed CSR has been an industry standard since the publication of the
14 Local Service Ordering Guidelines Issue 3 (“LSOG 3”), thus suggesting
15 that we should have already implemented what AT&T is requesting.

16
17 Q. DEFINE ‘LSOG’, AND EXPLAIN BELLSOUTH'S POSITION REGARDING
18 LSOG.

19
20 A. LSOG, or Local Service Ordering Guidelines, is the set of guidelines for
21 ALECs to use when ordering local service. The guidelines were originally
22 established in accordance with the consensus approval of the industry-
23 recognized Order and Billing Forum (OBF). BellSouth readily adopted -
24 and has fully supported – the OBF recommendations with few exceptions
25 regarding conflicts with BellSouth's legacy systems or established

1 processes. BellSouth currently supports LSOG Version 4 forms for
2 manual ordering.

3
4 Q. WHAT IS BELLSOUTH'S POSITION ON THIS SUB-PART?

5
6 A. As explained in detail below, BellSouth provides ALECs the CSR data in
7 the same manner that it provides the data to itself for use by the BellSouth
8 retail units.

9
10 Q. HAVE THE ALEC ELECTRONIC INTERFACES BEEN UPGRADED TO
11 LSOG 4?

12
13 A. Yes. The interfaces were upgraded from the Telecommunications
14 Industry Forum Issue 7 ("TCIF7") to TCIF Issue 9 ("TCIF9") and parts of
15 TCIF Issue 10 in January 2000 when OSS99, which is based on LSOG 4,
16 was implemented. The OSS99 enhancement consists of the "best of"
17 TCIF Issue 8, TCIF Issue 9 and TCIF Issue 10, as selected by the ALECs
18 participating in the EICCP and BellSouth. Approximately two years ago,
19 BellSouth conducted meetings with the ALECs via the EICCP to discuss
20 the impact of moving from TCIF7 to TCIF9 (LSOG 4). Because of the
21 major efforts required to upgrade from TCIF7 to TCIF9, a decision was
22 made by the members of the EICCP, which included AT&T, to implement
23 the components that were most critical to the ALECs. The subparsed
24 CSR requested by AT&T was not included in this enhancement.

25

1 Q. HAS A CHANGE REQUEST FOR PARSED CSRS BEEN SUBMITTED
2 TO THE CCP?

3

4 A. Yes. AT&T submitted a Change Request, Log # TAG0812990003, on
5 August 12, 1999, requesting that BellSouth deliver a parsed CSR as part
6 of the pre-ordering functionality.

7

8 Q. WHAT IS THE STATUS OF THIS CHANGE REQUEST?

9

10 A. AT&T's Change Request was presented during the September 28, 1999
11 CCP Enhancement Review Meeting and prioritized as one of eleven
12 pending change requests to be considered for implementation in 2000.
13 During the November 30, 1999 CCP Release Planning Meeting, this
14 Change Request was updated for planning and analysis to begin in mid-
15 2000. This pending change request was reviewed during the March 29,
16 2000 CCP Monthly Status Call and it was decided a sub-team would be
17 formed during 2000 to investigate the implementation of sub-parsed CSR.
18 This change request was prioritized as the number one pre-ordering
19 request during the June 28, 2000 Change Review Meeting.

20

21 The sub-team has been formed; it includes representatives from BellSouth
22 and the ALEC CCP participants. The initial Parsed CSR team meeting
23 was conducted on October 3, 2000, and a subsequent sub-team meeting
24 was held on October 19, 2000. The September 28, 1999 meeting minutes
25 are included as Exhibit RMP-13, the minutes from the March 29, 2000 call

1 are Exhibit RMP-14, the minutes from October 3, 2000 meeting are Exhibit
2 RMP-15, and the minutes from the October 19, 2000 meeting are Exhibit
3 RMP-16.

4
5 I would note that while the time frames mentioned above may seem
6 lengthy, it is the ALECs that prioritize the changes that are addressed and
7 implemented and the time frames that have resulted are the consequence
8 of the ALECs themselves placing more important or critical changes
9 ahead of the change request for parsing, particularly with regard to OSS99
10 release where other changes were made.

11
12 Q. EXPLAIN HOW THE ALECS CAN PARSE THE CSR VIA TAG.

13
14 A. The TAG pre-ordering interface can be integrated with the TAG ordering
15 interface or the Electronic Data Interexchange ("EDI") ordering interface.
16 The CSR data that is delivered to the ALEC via TAG can be further parsed
17 by the ALEC to exactly the level needed on an order, just as BellSouth
18 parses CSRs in its own retail operations.

19
20 Q IF THE ALEC INTEGRATES THE TAG PRE-ORDERING INTERFACE
21 WITH ITS TAG OR EDI ORDERING INTERFACE AND WITH ITS OSS,
22 WILL THE CSR INFORMATION OBTAINED VIA TAG "FLOW INTO" ITS
23 OWN OSS?

24

1 A. Yes, that is the purpose of integratable, machine-to-machine interfaces.
2 ALECs, such as AT&T, can integrate the TAG pre-ordering interface with
3 the TAG ordering interface or the EDI ordering interface. ALECs can
4 integrate these interfaces with their own internal OSS. Integration allows
5 the ALECs the ability to manipulate the data obtained via the TAG pre-
6 ordering interface. This includes the ability to further parse the CSR. The
7 data can be manipulated so that it will "flow into" an ALEC's OSS.

8

9 Q. DOES AT&T NEED A PARSED CSR TO INTEGRATE ITS OWN
10 SYSTEMS WITH BELLSOUTH'S?

11

12 A. No. As I explained previously, BellSouth provides ALECs the ability to
13 parse information on the CSR, using the integratable machine-to-machine
14 TAG pre-ordering interface. The TAG gateway transmits the CSR
15 information as a stream of data, which an ALEC can parse to the same
16 line level using the same unique section identifiers and delimiters that
17 BellSouth does for itself. Furthermore, BellSouth does provide "sub-line"
18 parsing of the end user's address during the address validation process in
19 TAG. Thus, TAG allows ALECs to parse CSRs in the same way that
20 BellSouth Retail systems parse CSRs, and AT&T needs nothing further.

21

22 **Sub-part (b) Electronic Ordering of All Services and Elements**

23 Q. BEFORE ADDRESSING SUB-PART B, WILL YOU PROVIDE A
24 DEFINITION OF THE MANUAL SUBMISSION AND ELECTRONIC

1 SUBMISSION WITH SUBSEQUENT MANUAL HANDLING METHODS
2 OF SUBMITTING LSRS?

3
4 A. Yes. Manual submission refers to the manual or non-electronic
5 submission of LSRS. Manual submission of LSRS can be accomplished
6 by facsimile. The manual submission is a result of the fact that the
7 services ordered require substantial manual handling and cannot be
8 submitted electronically. Alternatively, some ALECs may simply choose
9 not to utilize BellSouth's electronic interfaces, even though the request
10 may be submitted electronically.

11
12 Electronic processing with subsequent manual handling means the LSRS
13 may be submitted electronically by the ALEC but the requested service
14 orders are designed to "fall out" for manual handling by the LCSC. This
15 "fall out" results from the fact that the requested services are complex or
16 for other specified reasons, such as a request to expedite the order. After
17 these LSRS are transmitted to BellSouth via the electronic interface, they
18 are handled as if they were faxed, courier or mailed to the LCSC. I will
19 discuss each method of submission in detail later in my responses to sub-
20 parts (b) and (c).

21
22 Q. WHAT IS BELL SOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
23 SUB-PART B OF THIS ISSUE?

24

1 A. As BellSouth understands AT&T's position, AT&T is asking that BellSouth
2 provide it the ability to submit "all" LSRs electronically.

3

4 Q. WHAT IS BELLSOUTH'S POSITION ON SUB-PART B OF THIS ISSUE?

5

6 A. BellSouth's position is that non-discriminatory access does not require that
7 all LSRs be submitted electronically and involve no manual processes.
8 BellSouth's own retail processes often involve manual processes, as I will
9 describe below, and therefore there is no requirement that every LSR has
10 to be submitted electronically in order to provide non-discriminatory
11 access.

12

13 However, before I discuss this issue any further, I want to state again that
14 all change requests for BellSouth's electronic and manual interfaces
15 should be submitted via the CCP. OSS issues subject to the CCP are not
16 appropriate for this arbitration. These issues must be dealt with by
17 BellSouth and all of the ALECs participating in the CCP, not just by AT&T
18 and BellSouth in an arbitration such as this one.

19

20 Q. BY THE WAY, HAS A CHANGE REQUEST BEEN SUBMITTED VIA THE
21 CCP FOR THIS ELECTRONIC SUBMISSION OF ALL LSRS?

22

23 A. To BellSouth's knowledge, no such a change request has been submitted
24 to the CCP.

25

1 Q. CAN YOU ELABORATE ON YOUR EARLIER REMARK THAT NON-
2 DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE
3 SUBMITTED ELECTRONICALLY?
4

5 A. Yes. As I stated in my position, non-discriminatory access does not
6 require that all LSRs be submitted electronically. Many of BellSouth's
7 retail services, primarily complex services, involve substantial manual
8 handling by BellSouth account teams for BellSouth's own retail customers.
9 Non-discriminatory access to certain functions for ALECs legitimately may
10 involve manual processes for these same functions. Therefore, these
11 processes are in compliance with the Act and the FCC's rules.
12

13 Q. PLEASE DESCRIBE HOW BELLSOUTH'S COMPLEX SERVICE
14 REQUESTS ARE MANUALLY HANDLED FOR BELLSOUTH AND
15 ALECS.
16

17 A. There are two types of complex services: "Non-designed" and "Designed."
18 A "Non-designed" service is a class of service with a Universal Service
19 Order Code ("USOC") that does not require special provisioning and is
20 served by one central office or wire center. A "Designed" service involves
21 special engineering and provisioning.
22

23 An example of a "Designed" complex service for which retail handling is
24 not fully mechanized is Multiserv® service. This is a complex service
25 available to both BellSouth's retail customers and to resellers. In the case

1 of MultiServ®, the pre-ordering processes are largely manual. These
2 manual pre-ordering processes are substantially the same for both retail
3 and ALEC orders. Orders for retail services are handled primarily by the
4 appropriate business unit for retail services -- BellSouth Business Systems
5 ("BBS") account teams. Orders for ALEC services are handled by the
6 appropriate business unit for ALEC services – ALEC account teams that
7 are part of Interconnection Services ("ICS"). The ICS account team's
8 handling of complex services for ALECs is substantially the same as
9 BBS's account team handling of complex services for BellSouth's retail
10 customers; they both use substantially the same processes as described
11 below.

*

12
13 Attached to my testimony is Exhibit RMP-17, which depicts the flow of the
14 process for ordering MultiServ® service by ALECs and Exhibit RMP-18,
15 which depicts the flow of the process for ordering MultiServ® by
16 BellSouth's retail unit. To perform the pre-ordering activity for complex
17 services, which is known as a "service inquiry", a systems designer on the
18 appropriate BBS or ICS account team fills out an extensive paper form
19 and then provides that form to a project manager for further manual
20 activities. On approval of either the retail customer or the ALEC, as
21 appropriate, the paper service inquiry is re-initiated as a firm order, which
22 also is an extensive paper form with subsequent manual distribution. In
23 both the retail and the resale cases, the Firm Order Package is manually
24 handed off to the service center, where paper service order worksheets
25 are created to assist in initiating service orders in the ordering system. At

1 that point, orders are typed into the appropriate order systems, ROS for
2 the BellSouth Retail order and DOE for the ALEC order. The order entry
3 is handled in substantially the same manner for both the retail and the
4 resale situations, and thus, does not result in a different customer
5 "experience" in either case. The person who enters the complex order in
6 BellSouth's systems never has any contact with the end-user customer,
7 whether the customer belongs to an ALEC or BellSouth. After the service
8 order is input, the account team and project manager are notified by e-
9 mail of the service order numbers and due dates. The account team
10 manually reviews the service order for accuracy and follows up as
11 necessary. These processes, with their substantial reliance on manual
12 handling and paper forms, are common to both retail and ALEC orders.
13 Thus, BellSouth provides to ALECs the ability to order complex services in
14 substantially the same time and manner as it provides to its retail
15 customers.

16
17 Q. PLEASE DESCRIBE THE EDITING AND FORMATTING FUNCTIONS
18 CONTAINED IN THE SERVICE ORDER INTERFACES USED BY
19 BELL SOUTH'S CONSUMER SERVICES RETAIL UNIT.

20
21 A. RNS is the primary interface used by BellSouth's Consumer Services
22 retail unit. The presentation layer of RNS interfaces with the process layer
23 and several databases to create service requests. Two of the databases,
24 with which the presentation layer of RNS interfaces, are the Service Order
25 Language Analysis Routine ("SOLAR") and the FID USOC Editing Library

1 ("FUEL"). FUEL contains rules associated with service request generation
2 and a table for the translations of USOCs and FIDs to English. Those
3 rules include a copy of the Service Order Edit Routine ("SOER") service
4 order edits applicable to orders issued through RNS and mirror edits
5 applied within the Service Order Communications System ("SOCS").
6 SOLAR uses these rules in FUEL to construct and generate service
7 request with minimal errors.

8
9 Q. CAN AT&T AND OTHER ALECS PROVIDE THESE SAME EDITING AND
10 FORMATTING FUNCTIONS FOR THEIR INTERFACE OF CHOICE?

11
12 A. Yes. AT&T can build the same editing and formatting functions on its side
13 of the interface using information supplied by BellSouth. BellSouth
14 business rules for pre-ordering are contained in the BellSouth Pre-Order
15 Business Rules, the BellSouth Pre-Order Business Rules Appendix, and
16 the BellSouth Pre-Order Business Rules Data Dictionary. BellSouth's
17 business rules for placing electronic and manual LSRs are contained in
18 the BellSouth Business Rules for Local Ordering document. The business
19 rules for the SOER edits are contained in these guides on the BellSouth
20 Interconnection website:

21 (<http://www.interconnection.bellsouth.com/guides/guides-p.html>).

22
23 An ALEC such as AT&T can use this information to program the electronic
24 interfaces on their side of the gateway to perform the exact same
25 functionality performed by SOLAR/FUEL to ensure LSR submissions with

1 minimal errors. The availability of the information to the ALEC also gives
2 the ALEC the ability to customize their application for those SOER edits
3 which are unique to the services being ordered based on their business
4 plan. For those not desiring to make such an investment, most all of the
5 SOER edits are applied in LESOG. If a LSR does not "pass" LESOG's
6 checks, the LSR will be sent back instantly electronically to the ALEC for
7 clarification ("auto-clarified") for the most commonly ALEC-caused errors.
8

9 **Sub-part (C) Electronic Processing after Electronic Ordering without**
10 **Subsequent Manual Processing by BellSouth Personnel**

11 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
12 SUB-PART C?

13
14 A. As I understand this issue, AT&T is requesting that all complete and
15 correct LSRs submitted electronically flow through BellSouth systems
16 without manual intervention.

17
18 Q. WHAT IS BELLSOUTH'S POSITION ON SUB-PART C?

19
20 A. Non-discriminatory access does not require that all LSRs be submitted
21 electronically and flow through BellSouth's systems without manual
22 intervention.

23
24 Q. WHAT IS FLOW-THROUGH?
25

1 A. Flow-through for an ALEC LSR occurs when the complete and correct
2 electronically-submitted LSR is sent via one of the ALEC ordering
3 interfaces (EDI, TAG, or LENS), flows through the mechanical edit
4 checking and LESOG system, is mechanically transformed into a service
5 order by LESOG, and is accepted by the SOCS without any human
6 intervention.

7

8 Q. HAS ANY ALEC SUBMITTED A CHANGE REQUEST REGARDING THIS
9 ISSUE TO THE CCP?

10

11 A. No. To BellSouth's knowledge, no such change request has been
12 submitted to the CCP. As I have discussed previously, BellSouth's
13 position is OSS issues subject to the CCP are not appropriate for this
14 arbitration. AT&T is attempting to avoid the CCP. All requests for
15 enhancements to BellSouth's electronic and manual interfaces should be
16 submitted via the CCP.

17

18 Q. IS IT FEASIBLE FOR LSRS FOR ALL COMPLEX SERVICES TO BE
19 SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE
20 BELLSOUTH SYSTEMS?

21

22 A. No. As I discussed in sub-part (B), many of BellSouth's retail services,
23 primarily complex services, involve substantial manual handling by
24 BellSouth account teams for BellSouth's own retail customers. The orders
25 at issue here are those that the ALEC may submit electronically, but fall

1 out by design. In most cases these orders are complex orders. For
2 certain orders, BellSouth has, for the ease of the ALEC, allowed them to
3 be submitted electronically even though such orders are then manually
4 processed by BellSouth. The specialized and complicated nature of
5 complex services, together with their relatively low volume of orders as
6 compared to basic exchange services, renders them less suitable for
7 mechanization, whether for retail or resale applications. Complex,
8 variable processes are difficult to mechanize, and BellSouth has
9 concluded that mechanizing many lower-volume complex retail services
10 would be imprudent for its own retail operations, in that the benefits of
11 mechanization would not justify the cost. Because the same manual
12 processes are in place for both ALEC and BellSouth retail orders, the
13 processes are competitively neutral, which is exactly what both the Act
14 and the FCC require.

15
16 Q. WHAT ARE THE REASONS THAT ELECTRONICALLY SUBMITTED
17 ORDERS FALL OUT FOR MANUAL HANDLING?

18
19 A. There are two main reasons that electronically submitted orders fall out for
20 manual handling. The first reason is that the Local Exchange Service
21 Order Generator ("LESOG") has not been programmed to handle requests
22 for certain types of products and services, typically complex services.
23 Another example might be the inability to justify the economics of
24 programming for some types of low ordering volume products and

1 services, e.g. a "T" activity type, which is an outside move of an end user
2 location.

3
4 The second reason for fallout concerns unique circumstances related to
5 the LSR. Requests with pricing plans specific to the ALEC, requests
6 which have other related requests being processed, and subsequent
7 requests on an account prior to the new telephone number being posted
8 to the billing system are all examples of LSRs that are subject to fallout
9 due to unique circumstances.

10
11 Q. DOES THE FCC REQUIRE THAT ALL LSRs BE SUBMITTED
12 ELECTRONICALLY WITHOUT MANUAL INTERVENTION?

13
14 A. No. Non-discriminatory access does not require that all LSRs be
15 submitted electronically, and, further, the FCC doesn't require that all
16 electronically submitted LSRs have to flow through without manual
17 intervention. In its approval of in-region interLATA services for both
18 Southwestern Bell Telephone Company for Texas (paragraph 180) and
19 Bell Atlantic for New York (footnote 488), the FCC recognized that some
20 services could properly be designed to fall out for manual processing.

21
22 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 31.

23
24 A. I will summarize Issue 31 as follows:

25 1) Issue 31 is not appropriate for this arbitration.

- 1 2) A Change Request is pending in the CCP for a subparsed CSR.
2 This is an active element before the CCP and will be resolved
3 there.
- 4 3) Non-discriminatory access does not require that all LSRs be
5 submitted electronically. Some of BellSouth's services, primarily
6 complex services, require involve manual handling.
- 7 4) BellSouth is providing non-discriminatory access for ALECs to its
8 OSS functions. Non-discriminatory access does not require that all
9 LSRs be submitted electronically and flow through BellSouth's
10 systems without manual intervention.

11
12
13 ***Issue 32: Should BellSouth provide AT&T with the ability to access, via***
14 ***EBI/ECTA, the full functionality available to BellSouth from TAFI and***
15 ***WFA?***

16
17 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
18 THIS ISSUE?

19
20 A. AT&T states that it wants BellSouth to make the Trouble Analysis and
21 Facilitation Interface ("TAFI") functionality available in the industry
22 standard Electronic Communications Trouble Administration ("ECTA")
23 Gateway interface. What I believe AT&T really wants is an integratable
24 interface with all of the functionality currently available in TAFI. In other
25 words, AT&T wants its representatives to be able to input a trouble report,

1 receive the trouble screening and status and at the same time have the
2 trouble information populate AT&T's internal backend OSS systems. In
3 actuality, AT&T wants an entirely new non-industry standard machine-to-
4 machine maintenance and repair interface. TAFI is a human-to-machine
5 interface, while ECTA is a machine-to-machine interface.

6
7 Q. WHAT IS BELLSOUTH'S POSITION?

8
9 A. BellSouth currently provides ALECs with non-discriminatory access to its
10 maintenance and repair OSS functions through the TAFI and the ECTA
11 Gateway, and therefore meets its obligations under the Act and the FCC
12 Rules.

13
14 Q. PLEASE DESCRIBE HOW THESE INTERFACES PROVIDE NON-
15 DISCRIMINATORY ACCESS.

16
17 A. The following chart demonstrates that ALECs have the same access to
18 BellSouth's maintenance and repair OSS that BellSouth has for itself.

BellSouth Retail Interfaces	Repair & Maintenance Functions	Interfaces offered to ALECs
Residential TAFI Business TAFI	Full repair & maintenance functionality for telephone number-based (non-designed circuit) services	CLEC TAFI
	Industry standard functionality for telephone number-based (non-designed circuit) services (T1/M1 local)	ECTA Local*
WFA-C	Repair & maintenance functionality for designed circuit services (access to WFA system)	ECTA Local*

1 *BellSouth offers the EC-CPM human-to-machine interface to ALECs that
2 do not wish to build a machine-to-machine interface.

3
4 Q. IN ITS RECENT ORDER APPROVING BELL ATLANTIC NEW YORK'S
5 APPLICATION FOR LONG DISTANCE, WHAT DID THE FCC
6 DETERMINE REGARDING BELL ATLANTIC'S MAINTENANCE AND
7 REPAIR INTERFACE?

8
9 A. In paragraph 215 of its Memorandum Opinion and Order CC Docket No.
10 99-295 released on December 22, 1999 ("Bell Atlantic Order"), the FCC
11 stated that it specifically disagreed with "AT&T's assertion that Bell Atlantic
12 must demonstrate that it provides an integratable, application-to-
13 application interface for maintenance and repair." The FCC further found
14 that, although it did not offer a machine-to-machine maintenance and
15 repair interface when it filed, "Bell Atlantic satisfie[d] its checklist obligation
16 by demonstrating that it offers competitors substantially the same means

1 of accessing maintenance and repair functions as Bell Atlantic's retail
2 operations." Bell Atlantic accomplished this by providing ALECs with a
3 Web-based GUI. BellSouth accomplishes this by providing TAFI and
4 ECTA to ALECs. As shown above and described below, BellSouth
5 provides ALECs with electronic access to its maintenance and repair OSS
6 in a manner that far exceeds what is provided by the Web-based graphical
7 user interface ("GUI") that Bell Atlantic had in place when it was approved
8 by the FCC.

9
10 Q. PLEASE DESCRIBE THE ECTA INTERFACE.

11
12 A. ECTA uses the T1/M1 national standard for local exchange trouble
13 reporting and notification. This machine-to-machine interface provides
14 access to BellSouth's maintenance OSS supporting both telephone-
15 number and circuit-identified services - i.e., designed and non-designed
16 services. It supports both resold services and UNEs. Following the
17 industry standard for local exchange trouble reporting and notification, the
18 following functions are available to users of ECTA:

- 19 ● the ability to enter a report;
- 20 ● the ability to modify a report;
- 21 ● the ability to obtain status information during the life of the
22 report; and
- 23 ● the ability to cancel a report.

24
25 Q. PLEASE DESCRIBE BRIEFLY THE STANDARDS USED FOR ECTA.

1

2 A. ECTA is built on the ANSI standards T1.227, T1.228 and T1.262. These
3 standards were defined by the Electronic Communications Implementation
4 Committee ("ECIC"), a subcommittee of the Alliance for
5 Telecommunications Solutions ("ATIS") – the primary body addressing
6 industry standards and guidelines in these areas, for the exchange of
7 maintenance and repair data. The ANSI standards upon which ECTA is
8 built do not support gathering all of the various data elements requested
9 by AT&T nor do they support the real time interactive human-to-machine
10 interface necessary to deliver true "TAFI" functionality.

11

12 Q. IS AT&T A CURRENT USER OF ECTA?

13

14 A. No. AT&T Local (the ALEC) initiated production utilization of the
15 BellSouth ECTA interface on March 18, 1998. On April 9, 1998 AT&T
16 Local terminated the use of this interface. Furthermore, AT&T has
17 declined to participate in the Florida OSS Third Party Testing for ECTA.

18

19 Q. PLEASE DESCRIBE THE TAFI INTERFACE.

20

21 A. ALEC TAFI is a user friendly, real time human-to-machine repair and
22 maintenance interface that often enables trouble reports for non-designed
23 services to be cleared by the repair attendant handling the initial customer
24 contact, frequently with the customer still on the line. Since the CLEC
25 TAFI interface was introduced to ALECs in March 1997, ALEC TAFI has

1 had exactly the same functionality as the TAFI residential interface or the
2 TAFI business interface used by BellSouth. All upgrades to the two
3 BellSouth TAFI interfaces and ALEC TAFI interface have occurred in
4 parallel.

5
6 ALEC TAFI combines functionality for both residential and business
7 services, while BellSouth must use separate TAFI interfaces for its
8 residential and business retail units. TAFI was designed by BellSouth to
9 improve customer service by mechanically performing the traditional
10 screening function, and in many cases actually resolving the reported
11 trouble condition, while the customer remained on the line. This is possible
12 because TAFI correctly screens 80% of the reports for non-designed
13 services while the customer is on the line.

14
15 Q. WHAT ARE THE MAIN DIFFERENCES BETWEEN TAFI AND ECTA, AS
16 EACH PRESENTLY EXISTS?

17
18 A. The first difference, as previously discussed, is TAFI is a human-to-
19 machine interface and as such is not integratable, as opposed to the
20 machine-to-machine ECTA. While TAFI is a human-to-machine interface,
21 TAFI is the front-end system to the Loop Maintenance Operations System
22 ("LMOS"). LMOS provides a mechanized means for maintaining customer
23 line records and for entering, processing and tracking trouble reports. In
24 addition, TAFI interfaces with various BellSouth back-end Legacy systems
25 as part of gathering the relevant information for trouble screening and

1 provides a recommendation/resolution to the problem condition. As for
2 ECTA, the entered trouble ticket is mechanically routed to LMOS;
3 however, the automated trouble ticket screening functionality is not
4 provided. While it can be said that TAFI is integratable (interfaces) with
5 BellSouth's back-end Legacy systems, TAFI is not integrated with
6 BellSouth's marketing and sales support systems, RNS and ROS. As the
7 front-end system to LMOS, TAFI provides access to information about the
8 trouble reports of ALECs' end users just as it does for BellSouth's end
9 users. BellSouth, therefore, provides TAFI to ALECs as it does for itself.
10 If an ALEC wishes to populate its own maintenance and repair databases
11 with trouble report and resolution information, they can use ECTA. As a
12 machine-to-machine interface, the ALEC can integrate ECTA with its
13 internal OSS.

14
15 The second difference deals with the functionality of the interfaces. TAFI
16 and ECTA both provide the functionality to enter a trouble report, modify
17 the trouble report, obtain status information during the life of the trouble
18 report, and cancel the report for non-designed services. ECTA, however,
19 provides this functionality for both designed and non-designed services
20 whereas TAFI's functionality is limited only to non-designed services.
21 Additionally, for non-designed services, TAFI has the intelligence to
22 execute the appropriate test for that telephone number or retrieve the
23 relevant data to help analyze the problem reported. For example, if a
24 customer were to report that the customer's call forwarding feature was
25 not working, the TAFI system would check the customer's records to see if

1 the line should be equipped with the call forwarding feature. If verified that
2 the line should be equipped, TAFI would then electronically verify whether
3 the feature has been programmed in the switch serving that customer's
4 line. Once the TAFI analysis of the trouble is complete, TAFI provides a
5 recommendation of what is needed to correct the problem and in some
6 cases implements the corrective action. ECTA does not provide this "on-
7 line" resolution capability.

8
9 The final difference deals with industry standards. As previously
10 discussed ECTA is built on the ANSI standards T1.227, T1.228 and
11 T1.262. TAFI is not standards based. This is important as it relates to
12 AT&T's issue. If TAFI functionality was built into ECTA, then ECTA would
13 not longer be standards based interface. Plus it would add considerable
14 costs that would be borne by all ALECs although AT&T is the only ALEC
15 that has expressed interest for such.

16
17 Q. DID THE FCC ADDRESS THE INTEGRATION OF THE MAINTENANCE
18 AND REPAIR INTERFACES IN ITS MEMORANDUM OPINION AND
19 ORDER CC DOCKET NO 00-65 RELEASED ON JUNE 30, 2000 ("SWBT
20 ORDER")?

21
22 A. Yes. The FCC, in paragraph 203 of its SWBT order, concluded "that
23 SWBT offers maintenance and repair interfaces and systems that enable
24 a requesting carrier to access all the same functions that are available to
25 SWBT's retail representatives." "Both the [applicable to applications

1 Electronic Bonding Trouble Administrative interface] EBTA and [Graphical
2 User Interface Toolbar Trouble Administration interface] Toolbar interfaces
3 flow directly into SWBT's back-end OSS systems and enable competing
4 carriers to perform the same functions, in the same manner, that SWBT's
5 retail operations perform.”

6
7 In footnote 565 of the SWBT order, the FCC further “determined that a
8 BOC is not required, for the purpose of satisfying checklist item 2, to
9 implement an application-to-application interface for maintenance and
10 repair functions – provided it demonstrates that it provides equivalent
11 access to its maintenance and repair functions in another manner.”

12
13 Q. HAS AT&T BROUGHT THIS ISSUE UP BEFORE?

14
15 A. Yes. BellSouth has repeatedly reminded AT&T that ECTA is built
16 according to industry standards, which were required by AT&T's original
17 Interconnection Agreement. If AT&T requires additional ECTA
18 functionality, ECIC must develop the appropriate standard methodology
19 prior to BellSouth's consideration.

20
21 BellSouth representatives have informed AT&T on numerous occasions
22 that BellSouth could develop a non-industry standard integrated gateway
23 interface that would provide the various data elements and processing
24 logic that would emulate TAFI functionality. Development of such a new
25 non-industry standard machine-to-machine interface would require a

1 BonaFide Request ("BFR") from AT&T and AT&T would have to pay for
2 this development in advance. Submission of a BFR is the process used
3 for providing customer products and/or services. The BFR process is
4 outside the scope of the CCP. To date, BellSouth has not received a BFR
5 from AT&T requesting this type of interface nor has AT&T
6 introduced/negotiated this as part of its new Interconnection Agreement
7 with BellSouth.

8 .
9 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS REGARDING ISSUE 33.

10
11 A. BellSouth provides appropriate non-discriminatory access to TAFI and
12 ECTA and is not required to provide any additional functionality.

13
14 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

15
16 A. Yes.

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF RONALD M. PATE
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 000731-TP
5 JANUARY 3, 2001

6

7

8 **Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH**
9 **TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.**

10

11 **A. My name is Ronald M. Pate. I am employed by BellSouth**
12 **Telecommunications, Inc. ("BellSouth") as a Director, Interconnection**
13 **Services. In this position, I handle certain issues related to local**
14 **interconnection matters, primarily operations support systems ("OSS").**
15 **My business address is 675 West Peachtree Street, Atlanta, Georgia**
16 **30375.**

17

18 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?**

19

20 **A. Yes. I filed direct testimony – with exhibits – on November 15, 2000.**

21

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

23

24 **A. The purpose of my rebuttal testimony is to address various concerns and**
25 **issues raised in the direct testimony filed by AT&T – specifically that of**

1 AT&T Witness Jay M. Bradbury – in areas related to Operations Support
2 Systems (“OSS”). I will respond to Mr. Bradbury’s allegations made
3 against BellSouth in the following:

4
5 Issue 25 – Operator Services/Directory Assistance (“OS/DA”)

6 Issue 30 – BellSouth’s Change Control Process (“CCP”)

7 Issue 31 – Specific changes to BellSouth’s ordering and pre-
8 ordering interfaces

9 Issue 32 – Specific improvements to BellSouth’s maintenance and
10 repair interfaces

11
12 I will show that, for each area listed above, BellSouth has taken positive
13 steps to respond to AT&T’s formal requests, *if doable and reasonable* –
14 the same as BellSouth would do for any ALEC. Very simply, it is
15 BellSouth’s position that it is in compliance with current FCC and state
16 commission orders and rulings with regard to its dealings with ALECs, and
17 that BellSouth continues to monitor itself for such compliance in the face
18 of an ever-evolving industry.

19
20 ***Issue 25: What procedures should be established for AT&T to obtain loop-***
21 ***port combinations (UNE-P) using both Infrastructure and Customer-***
22 ***Specific Provisioning?***

23
24 Q. MR. BRADBURY CONTENDS ON PAGE 22 OF HIS TESTIMONY THAT
25 BELLSOUTH HAS NOT SUPPLIED AT&T WITH ALL OF THE DETAILED

1 TECHNICAL METHODS AND PROCEDURES THAT IT NEEDS TO
2 IMPLEMENT OPERATOR SERVICES/DIRECTORY ASSISTANCE
3 ("OS/DA") ROUTING. WHAT HAS BELLSOUTH PROVIDED TO AT&T IN
4 REGARD TO OS/DA?

5
6 A. As I stated in my direct testimony, BellSouth provided AT&T with proposed
7 contractual language for the three types of routings for its OS/DA calls
8 (unbranded, branded and third-party platform). AT&T was given the
9 unbranded contractual language in August, 2000, and both the branded
10 and third-party platform contractual language in October, 2000. Each
11 document provides the process for establishing the AT&T "footprint order"
12 for that particular option, and these three documents are provided together
13 as Exhibit RMP-19.

14
15 Additionally, Mr. Bradbury states in a footnote on Page 35 that "AT&T has
16 yet to receive footprint ordering instructions from AT&T". While it is likely
17 that he meant to refer to BellSouth in that footnote, BellSouth, in fact,
18 provided the user requirements for the unbranded OS/DA option – with
19 ordering instructions – to AT&T mid-November, 2000 in response to their
20 actual request for that option for a specific project – the so-called "friendly
21 test" to which he refers on Page 36. In fact, that test is the only request
22 that AT&T has made of BellSouth for the actual provisioning of OS/DA
23 routing. The User Requirements document is provided as Exhibit
24 RMP-20.

25

1 Mr. Bradbury also claims that BellSouth "has not produced detailed
2 technical methods and procedures sufficient to inform AT&T of
3 requirements for ordering customized routing". The aforementioned User
4 Requirements document provides that information for the only firm request
5 that AT&T has made to BellSouth for the provisioning of OS/DA routing.

6
7 Q. WHAT OTHER INFORMATION DOES BELLSOUTH THINK THAT AT&T
8 NEEDS TO ESTABLISH THE "FOOTPRINT ORDER" AND CUSTOMER-
9 SPECIFIC PROVISIONING FOR UNBRANDED OS/DA?

10
11 A. None.

12
13 Q. MR. BRADBURY STATES ON PAGE 32 OF HIS TESTIMONY THAT
14 BELLSOUTH PROVIDES NO PROCESSES FOR ELECTRONIC
15 ORDERING OF CUSTOMER-SPECIFIC OS/DA. IS THAT TRULY THE
16 CASE?

17
18 A. Definitely not. Mr. Bradbury also cites on Page 32 AT&T's formal change
19 request (EDI020900_001 – Electronic Order Routing to OS/DA) submitted
20 in February, 2000, and this is the same change request for which
21 BellSouth implemented the OS/DA unbranded option as part of Release
22 8.0 on November 18, 2000. Because of this implementation, orders
23 issued by AT&T for its specified project can be submitted electronically by
24 simply following the BellSouth business rules for ordering port/loop

1 combinations. No special or additional entries are required on the Local
2 Service Requests ("LSRs").

3
4 Q. IN HIS TESTIMONY, MR. BRADBURY MAKES REFERENCES ON
5 PAGES 32 THROUGH 36 REGARDING BELLSOUTH'S "UNILATERAL
6 DECISION" TO REMOVE THIS FEATURE FROM RELEASE 8.0. SINCE
7 THE FEATURE HAS BEEN IMPLEMENTED, WHY DOES HE ALLEGE
8 SUCH A DECISION?

9
10 A. It is unclear why Mr. Bradbury continues to make an issue of a decision
11 that occurred through some miscommunication, but that was never
12 implemented. BellSouth has acknowledged that it mistakenly decided and
13 communicated that the feature would be removed from Release 8.0. More
14 importantly, however, immediate action was taken when the situation was
15 brought to Mr. Keith Milner's and my attention. The release occurred as
16 scheduled with all of the parts necessary to allow electronic ordering as
17 requested by AT&T.

18
19 Q. PLEASE SUMMARIZE YOUR COMMENTS ON THE OS/DA ISSUE.

20
21 A. This issue continues to be a problem for which there seems to be no
22 viable solution that will satisfy AT&T. Mr. Milner once again discusses the
23 issue in his testimony, but the bottom line is that we have furnished AT&T
24 the information necessary to do electronic ordering in the one case where
25 AT&T has indicated a desire to do so. AT&T seems to want something

1 more, which, as Mr. Milner describes, is beyond the pale. Based upon
2 AT&T's requests for documentation and availability of all OS/DA options in
3 all locations, it is clear that AT&T would like for BellSouth to equip all
4 central offices in BellSouth's nine-state region with all of the OS/DA
5 options in the unlikely event that an ALEC (more precisely, AT&T) *might*
6 want to place orders at any time and at any place. That simply isn't
7 feasible based upon an overall lack of ALEC demand for OS/DA options,
8 nor is it viable from a financial standpoint. While providing OS/DA options
9 on an as-requested basis may not suit all of AT&T's requirements,
10 BellSouth nonetheless has a reasonable process for providing OS/DA.
11 AT&T's opinion of what is reasonable for BellSouth to do on a region-wide
12 basis is simply that – its opinion.

13
14 I'd like to add that BellSouth has made that process available to all
15 ALECs, and posted that information on BellSouth's Interconnection
16 Services website via Carrier Notification SN91082004 on November 22,
17 2000 (Provided as Exhibit RMP-21). Per the instructions in the Carrier
18 Notification, inquiries for this feature may be made to the ALECs' account
19 team representative.

20
21 **Q. IN HIS SUMMARY ON PAGE 36, MR. BRADBURY ASKS THE**
22 **COMMISSION TO PROVIDE AT&T WITH SPECIFIC DOCUMENTED**
23 **METHODS AND PROCEDURES FOR EACH OF THE CUSTOMIZED**
24 **ROUTING METHODS. DO YOU HAVE COMMENTS ON THAT**
25 **REQUEST?**

1

2 A. Yes. As BellSouth provided AT&T with the appropriate methods and
3 procedures for the unbranded option at such time as they made an actual
4 request for BellSouth to provide that option, so, too, would BellSouth
5 provide the same for either of the other two options based upon the
6 specificity of AT&T's request.

7

8 Q. WHAT WOULD YOU LIKE FOR THE COMMISSION TO DO IN
9 RESPONSE TO AT&T'S ALLEGATIONS?

10

11 A. Find that BellSouth has responded to AT&T's change request to
12 implement electronic ordering for OS/DA capability based upon the
13 parameters of its specified project, and the process doesn't require AT&T
14 to place any special indicators on its LSRs. In addition to documentation
15 given to AT&T for this project, BellSouth has also provided instructions on
16 how to obtain other options of OS/DA routing for future requests, and has
17 made that same information available to the general ALEC community.
18 BellSouth believes it has satisfied what Mr. Bradbury outlines in his
19 summary request of this Commission.

20

21 ***Issue 30: Should the Change Control Process be sufficiently***
22 ***comprehensive to ensure that there are processes to handle at a***
23 ***minimum the following situations:***

24 ***a) introduction of new interfaces***

25 ***b) retirement of existing interfaces***

- 1 **c) exceptions to the process**
- 2 **d) documentation, including training**
- 3 **e) defect correction**
- 4 **f) emergency changes (defect correction)**
- 5 **g) an eight-step cycle, repeated monthly**
- 6 **h) a firm schedule for notifications associated with changes**
- 7 **initiated by BellSouth**
- 8 **i) a process for dispute resolution including referral to state**
- 9 **utility commissions or courts**
- 10 **j) a process for escalation of changes in process**

11

12 Q. ON PAGE 49 OF MR. BRADBURY'S TESTIMONY REGARDING
13 BELLSOUTH'S CHANGE CONTROL PROCESS ("CCP"), HE CLAIMS
14 THAT BELLSOUTH'S CCP IS INADEQUATE. WOULD YOU PLEASE
15 RESPOND TO THAT CLAIM?

16

17 A. Yes. I will start by reiterating BellSouth's position from my direct testimony
18 that the Change Control Process is not a proper issue for arbitration with
19 an individual ALEC before an individual state commission. The CCP
20 covers BellSouth's regional interfaces and processes, and affects a CCP
21 membership of what has grown to approximately 100 ALECs.
22 Collaborative decisions that come from issues submitted to the CCP
23 ultimately affect over 300 ALECs and CLECs that are currently actively
24 operating in BellSouth's nine-state region (Note: There are over 1,600
25 commission-approved ALECs and CLECs around the region). As I stated

1 in my direct testimony on Page 22, our position is supported by the North
2 Carolina Public Service Commission's Staff proposed recommended order
3 from similar arbitration proceedings which states that "this arbitration
4 docket is an inappropriate forum for consideration of wholesale
5 modifications to the CCP or the CCP document, as proposed by AT&T."

6
7 Moving beyond this, however, the issue of the adequacy of BellSouth's
8 CCP also is being addressed by KPMG, the company approved by the
9 Florida and Georgia Public Service Commissions to perform Third Party
10 Testing per the orders of those Commissions. BellSouth believes that
11 determination of adequacy of the CCP for Florida can be properly
12 assessed and documented as part of the Third Party Testing process.

13
14 Q. MR. BRADBURY FURTHER STATES ON PAGE 55 OF HIS TESTIMONY
15 THAT BELLSOUTH'S CCP IS "NOT COLLABORATIVE". WHAT IS
16 BELLSOUTH'S VIEW OF THE COLLABORATIVE NATURE OF THE
17 CCP?

18
19 A. The process is clearly "collaborative." It is just not subject to the control of
20 AT&T, which is Mr. Bradbury's real issue. Mr. Bradbury insists that the
21 CCP document Version 2.0 is the appropriate document to discuss in this
22 arbitration, as he states on Page 58 of his testimony. However, while
23 explaining how the Commission should order adoption of AT&T's
24 proposed "red line" Version 2.0, he fails to mention that AT&T's document
25 also has been submitted to the CCP as a change request and that a

1 decision was made within the CCP (and not just at BellSouth's insistence,
2 as Mr. Bradbury alleges in his footnote on Page 51 of his testimony) to
3 develop a sub-team of ALECs to collectively build upon AT&T's original
4 proposed changes, and to present a joint ALEC proposal to the total CCP
5 membership. AT&T's regular representative to the CCP agreed to the
6 suggestion, and also agreed to head the effort. It is not clear how
7 BellSouth and the other ALEC's could be acting more "collaboratively".
8 We just aren't doing precisely what AT&T wants, which evidently makes
9 us "non-cooperative."

10
11 Also missing from his discussion is the fact that BellSouth has made its
12 own proposal to the CCP in response to the joint ALEC proposal. On
13 December 5, 2000, BellSouth submitted its proposed changes to CCP
14 document Version 2.0 to the sub-team, and that document – which
15 includes both the ALEC-proposed changes and BellSouth's agreement,
16 disagreement or compromise proposal to those changes – is the
17 document that is currently under review by the sub-team. It is provided as
18 Exhibit RMP-22. I will refer to it later in this testimony to show the
19 Commission that AT&T's various claims of inadequacy and non-
20 collaborative process cannot be supported.

21
22 In addition to KPMG's Third Party Testing assessment and documentation
23 of BellSouth's CCP, the current sub-team activity suggests that the ALECs
24 and BellSouth are interested in working toward solutions and
25 compromises that *improve the current* process and are acceptable to the

1 industry as a *whole*. The point is that the CCP is an evolving process, and
2 BellSouth feels it is more appropriate to look at the current and future
3 direction of the CCP rather than simply acceding to AT&T's demands,
4 which is evidently all that will satisfy AT&T in this regard.

5
6 Q. MR. BRADBURY ALSO CLAIMS ON PAGE 55 THAT BELLSOUTH HAS
7 TOTAL CONTROL AND VETO POWER OVER THE CCP, AND "MAY
8 SIMPLY IGNORE THE BUSINESS NEEDS AND WISHES OF THE ALEC
9 COMMUNITY". HOW DO YOU RESPOND TO THIS CLAIM?

10
11 A. What he really means is that there isn't a line in the CCP that indicates
12 that whatever AT&T wants, it gets, irrespective of whether the request is
13 reasonable or even concurred in by the rest of the affected ALECs. As
14 part of the CCP's collaborative effort – where consensus is required to
15 make decisions – BellSouth and the ALECs have made a concerted effort
16 to incorporate all reasonable and doable requests for changes. That is
17 reflected in BellSouth's CCP document Version 2.0. AT&T apparently
18 feels that BellSouth has no rights as a stakeholder in this process, and
19 should automatically acquiesce to ALEC requests even if those requests
20 fall outside of BellSouth's obligations under FCC orders, are not doable
21 under BellSouth's current processes, or require BellSouth to make
22 substantial financial investment for a limited potential utilization by the
23 ALEC community as a whole.

24

1 BellSouth follows the review process as stated in the CCP guidelines for
2 all change requests submitted by ALECs, and responds via the CCP in
3 what it feels is the appropriate manner, and gives appropriate
4 consideration to each such request. The idea that BellSouth has final veto
5 power is addressed by the CCP guidelines for dispute resolution as I
6 explained fully in my direct testimony (See Pages 64-65 of Exhibit RMP-22
7 for BellSouth's proposed wording changes to the existing Dispute
8 Resolution section). Suffice it to say here that the option exists for AT&T
9 or any other ALEC to take a dispute to a higher authority for resolution, if
10 necessary.

11

12 Q. MR. BRADBURY CONTENDS ON PAGE 56 OF HIS TESTIMONY THAT
13 BELL SOUTH DID NOT COMPLY WITH A CCP REQUIREMENT THAT
14 "SIZING AND SEQUENCING OF PRIORITIZED CHANGE REQUESTS
15 WILL BEGIN WITH THE TOP PRIORITY ITEMS AND CONTINUE DOWN
16 THROUGH THE LIST UNTIL THE CAPACITY CONSTRAINTS HAVE
17 BEEN REACHED". ARE YOU FAMILIAR WITH THIS SITUATION?

18

19 A. Yes. Mr. Bradbury is referring to Release 8.0, which was implemented on
20 November 18, 2000, and contained several low-priority items, along with
21 several high-priority items. Although some "low-priority items" were
22 included in the release, this in no way impacted whether other high-priority
23 items could have been included. In many instances during major
24 releases, there are changes that can be made with very little expenditure
25 of time and/or money, or without extensive software development. Since

1 the low-priority items are on the list to be worked at some point anyway, it
2 makes perfect sense to include all that can be included without
3 jeopardizing implementation milestones, which would have been the case
4 had BellSouth tried to include too many of the high-priority items. Filling
5 out a release with “easy-to-accomplish” items, even if they are low priority,
6 only makes sense. Release 8.0 could have been implemented without the
7 “low-priority items” but no additional “high priority” items would have been
8 included as a result. That doesn’t make much sense, but is typical of the
9 sort of complaint that AT&T seems intent on making until it finally just gets
10 its own way.

11
12 Mr. Bradbury would have this Commission believe that BellSouth does this
13 in an attempt to delay or harm the ALECs’ ability to compete, and that
14 simply isn’t the case. I will further add that it has long been the procedure
15 to rely on the use of “point” releases (e.g., 8.1, 8.2, etc.) to pick up
16 additional high- and low-priority items without waiting for the next major
17 release (e.g., 9.0, 10.0, etc.).

18
19 **Q. MR. BRADBURY FURTHER ASSERTS ON PAGE 56 THAT**
20 **BELLSOUTH “ROUTINELY ELECTS NOT TO COMPLY” WITH THE**
21 **CCP’S REQUIREMENTS, USING AS AN EXAMPLE THE RELEASE OF**
22 **ISSUE 9G OF BELLSOUTH’S BUSINESS RULES FOR LOCAL**
23 **ORDERING, WHICH HE CLAIMS WAS DONE WITH LITTLE ADVANCE**
24 **NOTICE TO ALECs, THAT BELLSOUTH REFUSED TO WITHDRAW**
25 **THE CHANGES, AND THAT THE RELEASE CONTAINED**

1 PROGRAMMING DEFECTS THAT COULD HAVE BEEN AVOIDED HAD
2 BELLSOUTH MADE THE RELEASE AVAILABLE TO ALECS FOR PRE-
3 TESTING. WHAT IS YOUR RESPONSE?
4

5 A. First, let me say that BellSouth does not "routinely" elect not to comply
6 with the CCP's requirements. With that said, it appears that AT&T has
7 managed to identify one situation where BellSouth should have run a
8 release through the CCP and failed to do so. This was Issue 9G of the
9 BellSouth Business Rules for Local Ordering ("BBR-LO"). We posted the
10 notice on August 31, 2000, to be effective October 2, 2000, thus providing
11 the requisite notice. We did not, however, properly process the matter
12 through the CCP. That is, the release was intended to correct defects in
13 documentation that had previously been identified. In addition, there was
14 one minor software change that was also included in the release.
15 Unfortunately, and as AT&T knows, there was a problem with the software
16 change which was corrected soon thereafter. Our rationale for going
17 forward with the release of the documentation changes, which is no
18 excuse for not following the process, was that the documentation changes
19 were corrections to existing documentation, which should not have been
20 anything other than a ministerial task, and was for the purpose of
21 benefiting the ALECs who rely on the documentation that was being
22 corrected. This is not, however, a systemic problem that I am aware of.
23 Given AT&T's penchant for documenting alleged problems, one would
24 assume that if this were a regular and constant problem, they would have
25 reams of examples. I do not believe this is the case. Our company is

1 committed to following the CCP. We have agreed to language that
2 requires us to do so. I wish I could guarantee that we would never make a
3 mistake, but that would simply be unreasonable. We are committed to
4 using our best efforts to make this process work, and we believe that on
5 the whole it does.

6
7 Q. ON PAGE 51 OF MR. BRADBURY'S TESTIMONY, HE STATES THAT
8 THE CURRENT CCP "FAILS TO COVER ALL AREAS THAT SHOULD
9 BE INCLUDED IN A ROBUST CHANGE CONTROL PROCESS" PER
10 THE FCC'S GUIDANCE. WHAT IS BELLSOUTH'S OPINION OF
11 COVERAGE OF THE AREAS SPECIFIED BY MR. BRADBURY?

12
13 A. BellSouth cannot find one area listed by Mr. Bradbury that isn't covered by
14 BellSouth's CCP document Version 2.0, or any proposed version. He also
15 inexplicably refers to the I-CCP, and regardless of whether he means the
16 original interim CCP or an earlier version of the CCP document, the
17 reference has no relevance in a discussion of the current Version 2.0. Mr.
18 Bradbury also uses the phrases 'does not adequately cover' or 'does not
19 provide an adequate process for' as he delineates the areas that he
20 purports are deficient. Those phrases certainly represent AT&T's highly
21 subjective opinions of those areas of the CCP. However, in spite of
22 AT&T's opinions about the current CCP document, BellSouth firmly
23 believes that the CCP document with both ALEC- and BellSouth-proposed
24 changes (Exhibit RMP-22) that is currently under review by the CCP sub-
25 team will ultimately become the document that best serves the interest of

1 the ALEC community as a whole, as well as BellSouth. The consensus
2 acceptance of the proposed document as the new baseline document
3 should render AT&T's complaints and allegations moot. Moreover,
4 consider this additional point. There are dozens of arbitrations going on
5 around the BellSouth region at this point. AT&T is the only ALEC that is
6 making the CCP an issue in the detail that is being presented here today.
7 The CCP may not meet AT&T's subjective standards (more of the "not
8 invented here" syndrome, probably), but clearly any number of ALECs are
9 using the system, without the incessant complaining that seems to have
10 become AT&T's hallmark.

11
12 **Q. BEGINNING ON PAGE 59 OF MR. BRADBURY'S TESTIMONY, HE**
13 **MAKES ALLEGATIONS REGARDING EACH OF THE SUB-ISSUES**
14 **OUTLINED AT THE HEAD OF THIS ISSUE SECTION. HOW WILL YOU**
15 **RESPOND TO EACH SUB-ISSUE?**

16
17 **A.** In the preceding answer, I addressed Mr. Bradbury's general statements
18 regarding these sub-issues. As Mr. Bradbury has done beginning on
19 Page 59, I will address each sub-issue in order and with more specificity.
20 Although CCP document Version 2.0 (dated August 23, 2000) is the
21 current operational document, BellSouth believes that it is more instructive
22 and forward-looking to consider the document with both the ALEC- and
23 BellSouth-proposed changes (Exhibit RMP-22). As I mentioned above,
24 this is the document currently under review by the sub-team, and, once
25 concurrence is reached by the CCP on the changes to be adopted, it will

1 become the new operational document. No doubt AT&T would prefer to
2 continue looking only at the August 23, 2000 document and the ALEC-
3 proposed changes in an effort to minimize the amount of collaborative
4 effort put forth by BellSouth in an attempt to better respond to the ALEC
5 community as a whole, but if the Commission is going to look at this
6 document, it ought to look at the most current version or at least at the
7 language that has been agreed to by the majority of the participating
8 ALECs.

9
10 I would also like to point out that, although the joint issues matrix agreed
11 upon by AT&T and BellSouth prior to the arbitration contains sub-issues
12 (a) through (j) for Issue 30, Mr. Bradbury has chosen to use his direct
13 testimony to introduce and address additional sub-issues (k) through (o)
14 which were not included in the matrix. I will not offer rebuttal to these
15 inappropriate inclusions, and request that the Commission disregard them.

16
17 ***a) Introduction of new interfaces***

18
19 Q. MR. BRADBURY STATES THAT LANGUAGE PROPOSED BY
20 BELLSOUTH WOULD ALLOW ONLY BELLSOUTH TO DETERMINE
21 WHETHER CHANGES TO NEW INTERFACES SHOULD BE MANAGED
22 UNDER THE CCP DOCUMENT. PLEASE RESPOND.

23
24 A. BellSouth's proposed language actually states on Page 56 of Exhibit
25 RMP-22 that changes to new interfaces would, in fact, be managed by the

1 process. Further, any new interfaces deployed by BellSouth will be
2 introduced to the ALEC community as part of the CCP. This is consistent
3 with my statements on Page 48 of my direct testimony.

4
5 ***b) retirement of existing interfaces***

6
7 Q. ON PAGE 60 OF MR. BRADBURY'S TESTIMONY HE INDICATES THAT
8 BELLSOUTH AND AT&T HAVE REACHED AGREEMENT ON A
9 PORTION OF THIS ISSUE. DOES BELLSOUTH AGREE WITH HIS
10 ASSESSMENT?

11
12 A. Mr. Bradbury is correct in his assessment of the issue as it relates to
13 BellSouth and AT&T. However, it must be stressed that the CCP Version
14 2.0 document being presented for discussion as part of this proceeding is
15 a document being used in the collaborative effort of the CCP
16 subcommittee. Thus, the proposed language is an issue for the CCP to
17 render final approval for this ALEC-wide issue.

18
19 I would like to point out that BellSouth has proposed language regarding
20 advanced notification of 120 days for the retirement of old *versions* of
21 interfaces on Page 57 of Exhibit RMP-22. Previously, there had been no
22 stated advance notification interval.

23
24 ***c) exceptions to the process***

25

1 Q. MR. BRADBURY STATES ON PAGE 61 OF HIS TESTIMONY THAT
2 AT&T WANTS A DOCUMENTED "EXCEPTION" PROCESS FOR
3 HANDLING TYPE 2-5 CHANGES UNDER UNUSUAL SITUATIONS, AND
4 THAT BELLSOUTH'S PROPOSAL IS UNACCEPTABLE. PLEASE
5 RESPOND.

6

7 A. AT&T's desire to have an "exceptions" process is understandable – it
8 would give AT&T an avenue to circumvent the process for all of the
9 special "needs" it devises. In its proposal, AT&T offers no substantive
10 information about what an "exception" might be, and BellSouth strongly
11 believes that all of the situations that may come before the CCP are
12 covered by one of the categories already defined in the process. The
13 process does not need to add terms and/or categories that have no
14 objective criteria to define them, thereby leaving their meaning open to
15 interpretation.

16

17 ***d) documentation, including training***

18

19 Q. MR. BRADBURY STATES ON PAGE 61 OF HIS TESTIMONY THAT
20 CHANGES WHICH WILL RESULT IN REVISIONS TO THE TRAINING
21 MATERIALS AND JOB AIDS BELLSOUTH PRODUCES FOR ALECS
22 ARE INCLUDED WITHIN THE SCOPE OF THE PROCESS. PLEASE
23 RESPOND.

24

1 work to incorporate more of AT&T's suggested additions to the defect
2 definition regarding requirement defects.

3
4 BellSouth believes a process currently exists within the CCP to deal with
5 true emergencies, which are defined as system outages (Type-1 System
6 Outage). For the type of "emergency" to which AT&T refers – a high-
7 impact defect – BellSouth has proposed an interval of two (2) business
8 days to develop and validate a workaround to remedy those situations
9 (See Exhibit RMP-22, Page 47, under Type-6 process flow). This
10 represents an improvement from the current four- (4) day interval. From
11 the point of development of a workaround, implementation of a true fix for
12 the validated high-impact defect would occur within a 4-to-25-business-
13 day range, with BellSouth committing to provide its best effort to minimize
14 the interval.

15
16 Mr. Bradbury further states on Page 62 that the "Draft Expedited Feature
17 Process" proposed by BellSouth is applicable neither to defect correction
18 nor emergency changes. That would be appropriate, since the latest
19 BellSouth-proposed expedited feature process (Pages 37-41 of Exhibit
20 RMP-22) is in response to the ALECs' request that the expedited feature
21 process be separated from the defect correction (Type-6) process.

22
23 ***g) an eight-step cycle, repeated monthly***

24

1 Q. MR. BRADBURY STATES IN HIS TESTIMONY ON PAGE 63 THAT
2 AT&T CONCURS WITH THE NUMBER AND SEQUENCE OF STEPS
3 CONTAINED IN BELLSOUTH'S PROPOSED CCP DOCUMENT
4 VERSION 2.0, FOR TYPES 2-5 CHANGE REQUESTS, BUT SAYS THAT
5 AT&T STILL CONTINUES TO REQUEST REDUCED CYCLE TIMES.
6 HOW DO YOU RESPOND?
7

8 A. BellSouth understands that AT&T has concurred in the number and
9 sequence of steps now before the CCP for consideration. BellSouth has
10 also made its own proposals in regard to the cycle times requested by
11 AT&T in Mr. Bradbury's testimony on Page 64, and, as is the case with the
12 CCP document as a whole, BellSouth's proposals are being reviewed
13 within the CCP.
14

15 While AT&T requests a reduction from 20 days to 10 days in the cycle
16 time to review change requests for acceptance, BellSouth has responded
17 that it feels that 20 days continues to be a reasonable and appropriate
18 cycle time in order to review the potential impact on other systems,
19 manual processes, documentation and training. Other steps include
20 determining if a change request already exists, determining if it is an
21 ALEC training issue, or determining if the request meets the criteria for an
22 expedited feature. BellSouth wants to ensure that appropriate front-end
23 planning occurs in order to minimize the possibility of defects later
24

1 The second cycle time Mr. Bradbury addresses involves a reduction from
2 30 to 25 days for the internal change management process step – the step
3 where BellSouth and the ALECs analyze impacts, sizing efforts, etc., for
4 change requests that have passed the CCP change request review
5 process and have been designated as candidates for implementation.
6 BellSouth has proposed a more workable solution (as outlined on Pages
7 54-55 of Exhibit RMP-22), since experience has shown that release
8 schedules may not coincide with the 30- or 25-day interval. BellSouth has
9 proposed that this step occur three-to-four months prior to a release – at
10 the Release Package Meeting – in an effort to allow consideration and re-
11 prioritization of new and/or non-scheduled change requests, without
12 jeopardizing release milestones.

13
14 ***h) a firm schedule for notifications associated with changes initiated***
15 ***by BellSouth***

16
17 Q. MR BRADBURY STATES ON PAGE 65 OF HIS TESTIMONY THAT
18 BELLSOUTH HAS REFUSED TO PROVIDE ALECS WITH DRAFT
19 SPECIFICATIONS RELATED TO BELLSOUTH-INITIATED CHANGES.
20 IS THAT TRUE?

21
22 A. Definitely not. It is more likely that AT&T didn't receive specifications as
23 early as it would have liked. However, in BellSouth's proposed changes to
24 CCP document Version 2.0 (Exhibit RMP-22, Page 22) still under review,
25 BellSouth has addressed the notification schedule. BellSouth's proposed

1 changes are as follows: user requirements for software releases (90 and
2 45 days advance notification for draft and final requirements, respectively);
3 new Telecommunications Industry Forum ("TCIF") mapping (180 days
4 advance notification for implementation release date, and 120 and 60
5 days advance notification for draft and final requirements, respectively);
6 and retirement of interfaces (120 days advance notification for the
7 retirement of old *versions* of interfaces).

8
9 In addition to these software- and system-related notifications, BellSouth
10 has also proposed to provide *all* documentation 30 days in advance of the
11 implementation of a change, whether system-affecting or non-system-
12 affecting. Previously, non-system-affecting documentation changes were
13 provided five (5) days in advance.

14
15 ***i) a process for dispute resolution including referral to state utility***
16 ***commissions or courts***

17
18 Q. ACCORDING TO MR. BRADBURY'S TESTIMONY ON PAGE 66, THIS
19 SUB-ISSUE SEEMS TO BE SATISFIED BETWEEN AT&T AND
20 BELLSOUTH. DO YOU AGREE?

21
22 A. Yes, but it would appear that Mr. Bradbury's statement negates his own
23 claim that BellSouth has total control and veto power over the CCP, as he
24 claimed on Page 55 of his testimony, and as discussed earlier in this
25 rebuttal.

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j) a process for escalation of changes in process

Q. IN HIS TESTIMONY ON PAGE 66, MR. BRADBURY REFERS TO SPECIFIC INTERVALS THAT AT&T HAS ADDED FOR VARIOUS STEPS OF THE ESCALATION PROCESS. DO YOU OFFER ANY REBUTTAL FOR THIS SUB-ISSUE?

A. Not per se, but I would like to inform the Commission that BellSouth has made its own proposal for reasonable and doable intervals for the escalation process as outlined in Exhibit RMP-22, Pages 58 and 62, for consideration by the CCP sub-team. In summary, BellSouth has proposed the following:

Type-1 issues:	1-day turnaround
Types 2-5 issues:	5-day turnaround
Type-6 High Impact issues:	2-day turnaround
Type-6 Medium and Low Impact issues:	5-day turnaround
Types 4-5 Expedite Process issues:	3-day turnaround

Q. IN LIGHT OF MR. BRADBURY'S OVERALL ALLEGATIONS OF INADEQUACY AND THE NON-COLLABORATIVE NATURE OF BELLSOUTH'S CCP, WHAT WOULD BELLSOUTH LIKE FOR THE COMMISSION TO RULE REGARDING THE CCP?

1 First, BellSouth would like the Commission to conclude that this matter should be
2 left to the collaborative process that BellSouth has shown to exist. Second, as
3 this Commission has ordered Third Party Testing, BellSouth proposes that the
4 Commission allow that process to determine the adequacy of the CCP, if it has
5 any concerns about simply leaving the matter to the existing CCP process.
6 Finally, if the Commission wants to go further, BellSouth requests that the
7 Commission view BellSouth's proposed changes to the CCP document Version
8 2.0 as the appropriate changes that should be made to the existing CCP
9 process.

10

11 ***Issue 31: What should be the resolution of the following OSS issues***
12 ***currently pending in the change control process but not yet***
13 ***provided?***

14

15 Q. IN HIS TESTIMONY ON PAGES 71-74, MR. BRADBURY CLAIMS THAT
16 BELLSOUTH HAS YET TO PROVIDE AT&T WITH OSS
17 FUNCTIONALITY TO SUPPORT THE QUALITY OF SERVICE ENJOYED
18 BY BELLSOUTH'S RETAIL CUSTOMERS, SPECIFICALLY AS IT
19 REGARDS: A) PARSED CUSTOMER SERVICE RECORDS; B) THE
20 ABILITY TO SUBMIT ORDERS ELECTRONICALLY FOR ALL SERVICES
21 AND ELEMENTS; AND, C) ELECTRONIC PROCESSING AFTER
22 ELECTRONIC ORDERING, WITHOUT SUBSEQUENT MANUAL
23 PROCESSING BY BELLSOUTH PERSONNEL. HOW DO YOU
24 PROPOSE TO RESPOND TO THESE CLAIMS FOR EACH SUB-PART?

25

1 A. Even though BellSouth continues to believe that this whole issue is
2 inappropriate for this arbitration because it is being addressed within the
3 CCP, I will address each of the sub-parts in the same order as Mr.
4 Bradbury has.

5

6 ***Sub-Part A) Parsed Customer Service Records***

7

8 Q. ON PAGES 73 AND 74 OF HIS TESTIMONY, MR. BRADBURY CLAIMS
9 THAT BELLSOUTH SHOULD PROVIDE PARSED CUSTOMER
10 SERVICE RECORDS FOR PRE-ORDERING PURSUANT TO INDUSTRY
11 STANDARDS, AND THAT AT&T MUST RE-ENTER THE SAME DATA
12 WHEN ORDERING, WHICH TAKES TIME AND COSTS EXTRA MONEY.
13 DO YOU AGREE?

14

15 A. No, I do not. As I presented in great detail in my direct testimony on
16 Pages 61-67, AT&T has the ability to parse customer service records
17 (“CSRs”) to the sub-line level that it wants by doing the parsing on its side
18 of the interface. BellSouth provides the same data stream of CSR
19 information to ALECs –via the machine-to-machine Telecommunications
20 Access Gateway (“TAG”) pre-ordering interface – which BellSouth
21 provides to its retail units. As detailed in my direct testimony, TAG is
22 based on the Common Object Request Broker Architecture (“CORBA”) industry
23 standard. Further, as stated on Page 62 of my direct testimony,
24 the FCC has contradicted AT&T’s interpretation of the Bell Atlantic New
25 York order by saying that “we have not previously stated that a BOC [“Bell

1 Operating Company"] must perform parsing on its side of the interface."
2 (AT&T Texas I Dalton/DeYoung Decl. at Para. 95) If AT&T feels that it
3 takes time and costs extra money for its service representatives to re-
4 enter data, perhaps that time and money should be invested in developing
5 the parsing capability on its side of the interface, as it is capable of doing.

6
7 With that said, and even though BellSouth's current position has been
8 supported by the FCC, an AT&T change request (TAG0812990003) for
9 parsed CSRs is currently being processed within the CCP, which is the
10 appropriate avenue and process for such a request. Because AT&T is
11 trying to use this arbitration proceeding to gain a Commission ruling
12 (thereby circumventing the CCP), mention of this change request has
13 been conveniently avoided by Mr. Bradbury.

14
15 However, as I mentioned in my direct testimony on Page 65, there is a
16 CCP sub-team devoted to processing this change request. The latest
17 sub-team meeting was November 16, 2000, and I have provided the
18 minutes of that meeting as Exhibit RMP-23. On December 12, 2000, an
19 e-mail was sent by the CCP to participating CCP ALECs asking for
20 comments on the work that had been done since the November 16, 2000
21 meeting, and attached to that e-mail were the following documents: an
22 updated Change Request, the November 16 Sub-Team Meeting minutes,
23 the Parsed CSR Action Item Log, ALEC User Requirements, and a
24 tentative Parsed CSR Implementation Timeline. Comments from the
25 ALECs are due by January 10, 2001, and a conference call has been

1 scheduled for mid-January 2001 to review the project and the
2 implementation timeline.

3
4 ***Sub-Part B) Electronic Ordering of All Services and Elements***

5
6 Q. ON PAGES 74 & 75 OF HIS TESTIMONY, MR. BRADBURY CLAIMS
7 THAT BELLSOUTH RETAIL UNITS CAN PLACE ELECTRONIC
8 ORDERS FOR EVERY SERVICE AND PRODUCT THAT IT PROVIDES
9 ITS CUSTOMERS. PLEASE COMMENT.

10
11 A. It is inappropriate to compare BellSouth's retail interfaces for submitting
12 service requests for complex orders – which utilize a legacy system that is
13 not compatible with the industry-standard LSR format – to that of an ALEC
14 issuing a complex order via the LSR industry-standard format. The issue
15 is one of translations of an LSR-formatted request to a format that can be
16 accepted by BellSouth's Service Order Communications System ("SOCS")
17 for provisioning by further downstream BellSouth OSS legacy systems.
18 The interfaces utilized by BellSouth's retail units do not have to deal with
19 this translations issue because the service requests are built in a SOCS-
20 compatible format.

21
22 Mr. Bradbury's testimony also suggests that it is a simple matter for
23 BellSouth to electronically input *any* order for a BellSouth retail customer,
24 and that is not the case. While the ultimate electronic input for a BellSouth
25 retail complex order may be the result of a "single employee" typing it, as

1 he states on Page 77, requests for complex services are actually the
2 result of a team of employees working to develop the information
3 necessary for that "single employee" to input the service request. That
4 team might include the account team, system designers, network
5 specialists and other subject matter experts required for input of
6 information to the order. Once that team has done its collective work, and
7 the BellSouth service representative has "gathered and arranged all of the
8 information" (to quote Mr. Bradbury), it is then typically written on a paper
9 service order form. It is from that form that a "single employee" inputs the
10 order utilizing the Regional Ordering System ("ROS") interface, for
11 example, for a business transaction. ROS then transmits the SOCS-
12 compatible formatted order and distributes it to the downstream
13 provisioning systems.

14
15 For ALECs placing a complex services request, the process is
16 substantially similar. It is still a team effort, but involves ALEC personnel
17 along with BellSouth account team representatives, system designers or
18 other BellSouth subject matter experts. Once the order information has
19 been "gathered and arranged" by the ALEC, it is then handed off via the
20 LSR process to BellSouth's Local Carrier Service Center ("LCSC"). This
21 process requires the ALEC to fill out an LSR for the requested service. It
22 is from this LSR that the BellSouth LCSC representative inputs the
23 request to the Direct Order Entry ("DOE") system. In other words, at that
24 point, a "single employee" types the order into DOE, which in turn puts the
25 information into a SOCS-compatible format, and distributes the order to

1 the same downstream service order and provisioning systems as does the
2 BellSouth retail order process. This process provides ordering for ALECs
3 in substantially the same time and manner as does the process for
4 BellSouth retail units.

5
6 Q. MR. BRADBURY ALSO CLAIMS ON PAGE 75 THAT BELL SOUTH HAS
7 CONTINUALLY REFUSED TO PROVIDE FULLY ELECTRONIC
8 ORDERING CAPABILITY TO ALECS, THUS REDUCING THE ALECS'
9 ABILITY TO COMPETE. HOW DO YOU RESPOND?

10
11 A. AT&T has not issued a change request asking for the electronic
12 submission of all Local Service Requests ("LSRs"), so it is unclear to
13 BellSouth how AT&T can say that BellSouth has continually refused that
14 capability. Because BellSouth adheres to the guidelines of the CCP,
15 BellSouth doesn't recognize a request for change to its OSS unless the
16 formal request comes through the CCP.

17
18 I would also like to reiterate my statement from my direct testimony that
19 nondiscriminatory access does not require that all LSRs be submitted
20 electronically, and that BellSouth's processes are in compliance with the
21 Telecommunications Act and the FCC rulings in that regard. AT&T's
22 contention that the competitive ability of ALECs is compromised because
23 all LSRs cannot be submitted electronically is unfounded and
24 unsubstantiated.

25

1 Q. CAN YOU HELP PUT THIS ISSUE IN PERSPECTIVE BY DISCUSSING
2 THE PERCENTAGE OF ORDERS THAT ARE SUBMITTED
3 ELECTRONICALLY BY ALECS AS OPPOSED TO MANUAL
4 SUBMISSIONS?

5
6 A. Yes. As a point of reference, in October 1999, a total of 214,641 Local
7 Service Requests (LSRs) were processed by BellSouth. Of that total,
8 103,123 (48%) were submitted manually and 111,518 (52%) were
9 submitted electronically. As of October 2000, one year later, LSR total
10 submissions had grown by 84% to 393,795. However, in October 2000,
11 only 12% (47,961 LSRs) were submitted manually and 88% (345,834
12 LSRs) were submitted electronically. The facts speak for themselves.
13 The ALEC community as a whole has found the deployment of the
14 electronic interfaces to be effective and the vast, vast majority of all orders
15 are submitted electronically at this time. While everyone would like 100%
16 of orders to be submitted electronically, because BellSouth's personnel
17 have to be involved when an order is submitted manually, as well as the
18 ALEC personnel, it is unreasonable to expect that every order will be
19 electronically submitted anytime in the immediate future. Such a
20 requirement would make no sense and should not be imposed on
21 BellSouth.

22
23 ***Sub-Part C) Electronic Processing after Electronic Ordering without***
24 ***Subsequent Manual Processing by BellSouth Personnel***

25

1 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF AT&T'S POSITION ON
2 SUB PART C?

3

4 A. As I understand this issue, AT&T is requesting that all complete and
5 correct LSRs submitted electronically flow through BellSouth systems
6 without manual intervention.

7

8 Q. WHAT IS BELLSOUTH'S POSITION ON SUB PART C?

9

10 A. Nondiscriminatory access does not require that all LSRs be submitted
11 electronically and flow through BellSouth's systems without manual
12 intervention.

13

14 Q. WHAT IS FLOW-THROUGH?

15

16 A. Flow-through for an ALEC LSR occurs when the complete and correct
17 electronically-submitted LSR is sent via one of the ALEC ordering
18 interfaces (EDI, TAG, RoboTAG, or LENS), flows through the mechanical
19 edit checking and LESOG system, is mechanically transformed into a
20 service order by LESOG, and is accepted by the Service Order Control
21 System ("SOCS") without any human intervention.

22

23 Q. HAS ANY ALEC SUBMITTED A CHANGE REQUEST REGARDING THIS
24 ISSUE TO THE CCP?

25

1 A. No. To BellSouth's knowledge, no such change request has been
2 submitted to the CCP. As I have discussed previously, BellSouth's
3 position is that OSS issues subject to the CCP are not appropriate for this
4 arbitration. AT&T is attempting to avoid the CCP. All requests for
5 enhancements to BellSouth's electronic and manual interfaces should be
6 submitted via the CCP.

7

8 Q. IS IT FEASIBLE FOR LSRS FOR ALL COMPLEX SERVICES TO BE
9 SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE
10 BELLSOUTH SYSTEMS?

11

12 A. No. As I discussed in sub-part (B) of my direct testimony, many of
13 BellSouth's retail services, primarily complex services, involve substantial
14 manual handling by BellSouth account teams for BellSouth's own retail
15 customers. The orders at issue here are those that the ALEC may submit
16 electronically, but fall out by design. In most cases these orders are
17 complex orders. For certain orders, BellSouth has, for the ease of the
18 ALEC, allowed them to be submitted electronically even though BellSouth
19 then manually processes such orders. The specialized and complicated
20 nature of complex services, together with their relatively low volume of
21 orders as compared to basic exchange services, renders them less
22 suitable for mechanization, whether for retail or resale applications.
23 Complex, variable processes are difficult to mechanize, and BellSouth has

1 concluded that mechanizing many lower-volume complex retail services
2 would be imprudent for its own retail operations, in that the benefits of
3 mechanization would not justify the cost. Because the same manual
4 processes are in place for both ALEC and BellSouth retail orders, the
5 processes are competitively neutral, which is exactly what both the Act
6 and the FCC require.

7

8 **Q. DO COMPLEX ORDERS PROCESSED ON BEHALF OF BELL SOUTH**
9 **REQUIRE MANUAL INTERVENTION?**

10

11 **A. Yes. As previously described in the case of service requests for complex**
12 **services by ALEC or BellSouth end users, there are systems designers**
13 **and consultants involved in the work flow between the ALEC or BellSouth**
14 **representative who take the service request and the person who inputs**
15 **the service order into the system. These designers and consultants clarify**
16 **and expand on the information from the end user customer as necessary**
17 **to prepare the order for input. Therefore, complex orders, even those that**
18 **can be submitted electronically, do not flow through because there is**
19 **significant manual intervention, the amount of which varies from order to**
20 **order, between the time order information is taken by the ALEC or**
21 **BellSouth representative and before the order is input.**

22

1 Q. ARE THERE OTHER REASONS FOR ORDERS TO FALLOUT BY
2 DESIGN THAN BEING A COMPLEX SERVICE?

3

4 A. Yes. There are appropriate categories other than complex services for an
5 LSR to fallout by design for manual handling. All of these categories have
6 been identified in the Service Quality Measurements Performance Reports
7 document for the Percent Flow-Through Service Requests (Summary).
8 The document can be found at the password-protected BellSouth
9 Performance Measurements Report website
10 (https://pmap.bellsouth.com/clec_specific_reports.cfm).

11

12 One situation for which it makes sense for LSRs to fall out by design is the
13 result of the decision not to program the Local Exchange Service Order
14 Generator ("LESOG") to handle certain capability in advance of standards,
15 such as partial migrations for other than conversion as-is. It could also
16 include order types of very low volume. Because special pricing plans are
17 unique to each ALEC, no automatic service order generation is possible
18 for such orders. Another example is when an ALEC (or BellSouth)
19 submits a service request before the new telephone number for the end
20 user has been posted to the billing system; in those situations, the request
21 will appropriately fall out for manual handling.

22

1 Q. ON PAGES 81-87 MR. BRADBURY DISCUSSES THE ALLEGED
2 IMPACT OF DESIGNED MANUAL FALL OUT AND BELLSOUTH-
3 CAUSED SYSTEM FAILURES. DO YOU AGREE WITH HIS
4 ASSESSMENT?

5
6 A. No. This is the part of his testimony where Mr. Bradbury purports to use
7 numbers and figures to show the problems he asserts are raised by this
8 issue. Unfortunately for him, Mr. Bradbury has presented an elaborate,
9 but inconclusive approach utilizing regional flow-through data and it has
10 led him to the wrong conclusion. More importantly, Mr. Bradbury has tried
11 this in earlier versions of his testimony and I have previously pointed out
12 that he does not have sufficient information to be able to reach the
13 conclusions he wants to reach. Nevertheless, he continues to insist on
14 including what can only charitably be called misleading information
15 regarding this topic

16
17 To better understand BellSouth's performance one must "peel the onion"
18 back and look at detail into the numbers and actual LSRs submitted. Mr.
19 Bradbury's process does not do so. In all fairness, and I have said this in
20 each jurisdiction where Mr. Bradbury insists on bringing his misleading
21 and incomplete analysis up, I have to say that in order to be thorough,
22 which Mr. Bradbury was not, one has to look at the actual data underlying
23 the results that are reported. Mr. Bradbury obviously does not have

1 access to this data and it is appropriate that he does not since it involves
2 information germane to other ALECs. Nevertheless, his conclusions
3 based on incomplete data are wrong and misleading and that is why he
4 should speak only to AT&T's experiences and supporting data if he wants
5 to make comments in this area.

6

7 Q. DO YOU AGREE WITH MR. BRADBURY'S PRESENTATION OF THE
8 DATA IN HIS ANALYSIS?

9

10 A. No. Mr. Bradbury has intentionally misrepresented the data for the month
11 of September 2000 to more favorably reflect his point of view in what is
12 already a faulty analysis process. Specifically, Mr. Bradbury has taken the
13 data reflected in the report column for "Pending Supps" and added this to
14 the data reflected in the report column for "Total Manual Fallout" and used
15 this sum as the amount for Total Manual Fallout. Attached as Exhibit
16 RMP-24 is the PERCENT FLOW-THROUGH SERVICE REQUESTS
17 report for September 2000. This is commonly referred to as the 'flow-
18 through' report and is made available publicly via BellSouth's performance
19 measures website. Please refer to page 22 of this report. On this page
20 you will note the summary information which as noted at the top of the
21 page is for the 'BUSINESS DETAIL'. Now please compare this to Exhibit
22 JMB-20 filed in Mr. Bradbury's direct testimony. On page 3 of Mr.
23 Bradbury's exhibit the last 3 columns represents a snapshot of some of

1 the summary data from page 22 of the flow-through report. A comparison
 2 of the data is noted below.

3	4	5	6
	<u>Exhibit JMB-20</u>	<u>Flow-through Report</u>	<u>Manual Fall Out</u>
5	LENS	2,207	1,856
6	TAG	442	411
7	EDI	727	657

8
 9 The difference in the amounts can be found in the 'Pending Supps'
 10 column of the flow-through report. That column reflects the following:

11	12	13
	<u>Pending Supps</u>	
13	LENS	351
14	TAG	31
15	EDI	70

16
 17 **Q. WHAT ARE 'PENDING SUPPS'?**

18
 19 **A. Pending Supps is short for Pending Supplements. A Pending Supplement**
 20 **is the result of a LSR that has been submitted by an ALEC being changed**
 21 **(supplemented) by the ALEC prior to acceptance by BellSouth. It results**
 22 **in the initially submitted LSR going into a pending status as the**
 23 **mechanical systems have recognized the subsequent LSR submittal. The**
 24 **LSR in the pending status will eventually be mechanically deleted by the**

1 system. These deleted LSRs are being categorized for purposes of flow-
2 through as Pending Supps.

3

4 Q. HAS BELLSOUTH ALWAYS HAD THE CATEGORY 'PENDING SUPPS'
5 ON THE FLOW-THROUGH REPORT?

6

7 A. No. This was a new category added with the September 2000 report.

8

9 Q. WHAT PROMPTED THIS CHANGE TO THE REPORT?

10

11 A. This is the result of an exception as part of the Third Party Testing being
12 conducted in Georgia. KPMG¹ identified this as an exception during their
13 reconciliation of the flow-through report. Initially these pending LSRs were
14 being identified as an ALEC error. As a result of the KPMG Third Party
15 Testing exception, BellSouth re-categorized these LSRs as a BellSouth
16 caused error. However, KPMG did not agree with that categorization as it
17 was felt these LSRs were not an error on the part of the ALEC or
18 BellSouth. Instead, these LSRs are just a part of the process. So a new
19 category (Pending Supps) was created to properly categorize the LSRs.

20

21 Q. SO THESE 'PENDING SUPPS' LSRS HAVE NEVER BEEN COUNTED
22 AS PART OF 'TOTAL MANUAL FALLOUT' FOR FLOW-THROUGH?

23

¹ KPMG Consulting, LLC provides oversight of Third Party ordered by the Georgia Public Service Commission to determine whether BellSouth's provision of access to OSS functionality enables and supports CLEC entry into the local market.

1 A. That is correct. As I just described, these LSRs at one time were ALEC
2 errors and then were re-categorized as BellSouth errors, but they have
3 never been categorized as 'Manual Fallout'.
4

5 Q. WAS THIS CHANGE TO THE FLOW-THROUGH REPORT
6 COMMUNICATED TO THE ALECS?
7

8 A. Yes. As previously stated, the monthly flow-through report is made
9 available publicly to the ALECs via BellSouth's performance measures
10 website. With the posting of this report in September, a notice of this
11 change was also posted to the performance measures website.
12

13 Q. ARE THERE OTHER ISSUES WITH MR. BRADBURY'S ANALYSIS OF
14 THE FLOW-THROUGH REPORT DATA?
15

16 A. Yes. Using September 2000 as an example, there were 256,381 LSRs²
17 submitted electronically to BellSouth. To understand this data and the
18 impact it has on flow-through, one must have a thorough understanding of
19 the individual ALEC data comprising the total.
20

21 Q. CAN YOU ILLUSTRATE WHY LOOKING AT INDIVIDUAL ALEC DATA IS
22 NECESSARY FOR A THOROUGH ANALYSIS AND UNDERSTANDING
23 OF MR. BRADBURY'S EXAMPLE?
24

² PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL), September 2000 report at page 10, total reflected for "TOTAL INTERFACES" row in "Total Mech LSRs" column, Exhibit RMP-24.

1 A. Yes. For sake of illustration let us use the PERCENT FLOW-THROUGH
2 SERVICE REQUESTS (BUSINESS DETAIL) report for September 2000.
3 The specific report used for this discussion is attached as exhibit RMP-24.
4 Pages 18 – 22 are the pages specific to the business flow-through report.
5
6 By conducting a detailed review of the report one can identify 136 users³
7 of the LENS electronic interface based on the number of individual
8 horizontal lines of data presented. There are also 6 users of the EDI
9 interface and 12 users of the TAG interface. From further review it can be
10 determined that there were 5 users of LENS that submitted 500 or more
11 LSRs. I will refer to these as the five dominant users of LENS. For EDI
12 there is only one dominant LSR volume user of EDI, and for TAG, there
13 are three dominant LSR volume users. For LENS, the five dominant users
14 submitted 3,990 LSRs. That accounted for 35% of the total business
15 resale LSRs submitted and 44% of the volume for the LENS interface
16 alone. For EDI, the one user submitted 1,191 LSRs. That accounted for
17 10% of the total business resale LSRs submitted and 98% of the volume
18 for the EDI interface. For TAG, the dominant users submitted 955 LSRs.
19 That accounted for 8% of the total resale business LSRs submitted and
20 90% of the volume for the TAG interface. The combination of these nine
21 users represents 54% of the overall business resale LSR volume
22 submitted via the electronic interfaces. This is over one-half of the
23 electronic LSR business resale submissions.

³ I have used the term 'user' instead of 'ALEC' when making reference to a horizontal line of data represented on the flow-through report. This is because each line of data represents an Operating Company Number ("OCN") and some ALECs have multiple OCNs. Thus, on the flow-through report two or more users may represent an ALEC's total data.

1

2

The data presented above is summarized in the following table.

3

	Total LSRs Electronically Submitted	Total Number of Users	Number of Dominant Users	LSRs Submitted by Dominant Users	Percent of LSRs by Electronic Interface	Percent of Total LSRs Electronically Submitted
LENS	9,168	136	5	3,990	44%	35%
EDI	1,221	6	1	1,191	98%	10%
TAG	1,056	12	3	955	90%	8%
Total	11,445	154	9	6,136	N/A	54%

4

5

6

Q. WHAT IS THE SIGNIFICANCE OF NINE USERS COMBINING FOR OVER ONE-HALF OF THE LSR BUSINESS RESALE VOLUME?

7

8

9

A. Obviously when such a large percentage of the volume comes from such a small number of the users, then the overall results for that area will be skewed by the performance of those few users. That is specifically the case for this situation.

10

11

12

13

14

Q. ARE THERE OTHER DATA WITH RESPECT TO THESE USERS THAT HAVE IMPACT ON THE OVERALL RESULTS?

15

16

17

A. Yes. These same nine users combine for 1,848 LSRs that fall out by design for manual processing. That represents 63% of the total manual fall out. For their respective electronic interfaces, the five users of LENS

18

19

1 account for 44% of the manual fall out for the LENS interface, the user of
2 EDI accounts for 98% of the manual fall out for the EDI interface, and the
3 three users of TAG account for 93% of the manual fall out for the TAG
4 interface.

5
6 Q. IS THERE A SPECIFIC REASON THESE CERTAIN USERS ARE
7 EXPERIENCING SUCH A HIGH MANUAL FALL OUT?

8
9 A. Yes. Once again the data is private and proprietary, but this fact goes to
10 demonstrate how incomplete knowledge can lead to incorrect conclusions.
11 Without identifying the users or providing any identifying or proprietary
12 information, I can state that the majority of the manual fall out for two of
13 the nine dominant users is the result of one particular service which they
14 resell to their end users. I know this as I personally reviewed their
15 situation for this analysis.

16
17 Q. HAS BELLSOUTH DONE ANYTHING TO THE FUNCTIONALITY OF
18 THE ELECTRONIC INTERFACES SPECIFIC TO THE SERVICE IN
19 QUESTION?

20
21 A. Yes. With the January 14, 2000 implementation of Release 6.0 of EDI
22 and Releases 3.0 and 3.1 of TAG (available for System Readiness
23 Testing on December 18, 1999), functionality was made available for this
24 particular service to flow through BellSouth's systems. In other words, the
25 service in question no longer falls out by design for manual handling.

1

2 Q. SINCE THESE RELEASES WERE IMPLEMENTED IN JANUARY 2000,
3 WHY ARE THESE USERS STILL EXPERIENCING SUCH A RATE OF
4 MANUAL FALL OUT?

5

6 A. This result is because these users have yet to implement these releases.
7 The timing of release implementation is controlled by the ALEC based on
8 its individual business needs and decisions. Obviously anyone reviewing
9 the public data would not know this and therefore could draw the wrong
10 conclusions from the public data, as Mr. Bradbury did, something I have
11 pointed out to Mr. Bradbury previously. This points, of course, to the need
12 to be careful what conclusions you draw from incomplete information.

13

14 Q. WOULD THERE BE ANY DIFFERENCE IN THE RESULTS BASED ON
15 MR. BRADBURY'S PROCESS HAD THESE USERS IMPLEMENTED
16 THE RELEASES?

17

18 A. Yes. The results would reflect a difference. To illustrate I have used a
19 conservative figure of 50% of the manual fallout reflected in the flow-
20 through just for these two users being able to flow through the systems.
21 This is based on the assumption that these users implemented the
22 Release 6.0 of EDI and Releases 3.0 and 3.1 of TAG. It also applies the
23 assumption just as Mr. Bradbury did in his assessment that the users
24 submitted service requests with absolutely no input errors. The results for
25 the business resale for the EDI and TAG interfaces would change as

1 noted below. Note that I have changed the AT&T results for 'Manual Fall
 2 Out' to properly represent the numbers by subtracting the 'Pending Supps'
 3 LSRs for the reasons described earlier in my direct testimony.

	Assessment by		Assessment by	
	<u>AT&T</u>		<u>BellSouth</u>	
	<u>TAG</u>	<u>EDI</u>	<u>TAG</u>	<u>EDI</u>
4				
5				
6				
7				
8	Total Mechanized LSRs	1056 1221	1056 1221	
9	Manual Fall Out	411 657	290 335	
10	Validated LSRs	463 403	585 725	
11	BellSouth-Caused System Failure	138 122	138 122	
12	Flow-through/Issued SOs	299 240	421 562	
13				
14	% Manual Fallout – LSRs	39% 54%	27% 27%	
15	% BellSouth System Failure – LSRs	13% 10%	13% 10%	
16	% BellSouth System Failure – VLSRs	30% 30%	24% 17%	
17				
18	% Total BellSouth Fallout + Failure	52% 64%	41% 37%	
19	LSRs			
20	% Max. One-Touch ALEC Orders	45% 30%	57% 57%	

21

22 Once again, this chart is for illustrative purposes only to show the impact
 23 of a failure to properly analyze the relevant data. As I stated above, this
 24 chart represents the impact of LSRs submitted by only two ALECs. This

1 chart is in no way indicative of the actual September 2000 flow-through
2 results.

3
4 Q. WHAT IMPACT WOULD THE ABOVE ILLUSTRATION HAVE ON THE
5 BUSINESS RESALE FLOW-THROUGH RESULTS AS REPORTED BY
6 BELLSOUTH FOR SEPTEMBER 2000?

7
8 A. For EDI business resale, the results would have improved to 82.2% from
9 the currently reported result of 66.3%. For TAG, the result would have
10 improved to 75.3% from the currently reported 68.4%.

11
12 Q. ARE THERE OTHER DATA THAT INFLUENCES THE FLOW-THROUGH
13 RESULTS THAT MR. BRADBURY DID NOT CONSIDER FOR HIS
14 ANALYSIS?

15
16 A. Yes. The above reflects the impact on only one area – business resale
17 flow-through. Even for this one area in my analysis, I gave no
18 consideration to the few ALECs that dominate the LSR volume submitted
19 via the LENS interface. As previously stated, there are five (5) users of
20 the LENS interface that contribute to 35% of the total LSR submissions for
21 business resale and another 28% of the total manual fallout. These five
22 users represent 44% of the LENS business resale volume and 44% of the
23 LENS manual fallout. One can combine these five with the one dominant
24 user of EDI and the three dominant users of TAG discussed earlier and
25 easily conclude that 9 of 154 users (6% of the users) of electronic

1 interfaces drive the flow-through results. Once again, these 9 combined
2 for business resale LSRs that accounted for one half (54%) of the volume
3 submitted during the month of September 2000. If further analysis of
4 these five LENS users and the other two users of TAG were conducted, it
5 would obviously impact the results further from what I have previously
6 presented. Similar correlation can be made to the UNE and LNP flow-
7 through reports, as there were forty-nine (49) users of the electronic
8 interfaces for UNE LSRs and nineteen (19) for LNP in September 2000.
9 One user accounted for 71% of the UNE LSR submissions and two users
10 accounted for 77% of the LNP LSR submissions.

11

12 Q. PLEASE SUMMARIZE CONCLUSIONS FROM YOUR ASSESSMENT.

13

14 A. A small number of ALECs are the dominant volume users of the electronic
15 interfaces. Therefore, the flow-through results of these few ALECs skew
16 the overall results. If these ALECs do not implement the latest software in
17 which BellSouth has implemented the ALEC-requested features, the
18 overall results will not properly represent the current state of functionality
19 capabilities existing for the electronic interfaces. That is the situation that
20 exists today.

21

22 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 31.

23

24 A. I will summarize Issue 31 as follows:

25 1) Issue 31 is not appropriate for this arbitration.

- 1 2) A Change Request is pending in the CCP for a sub-parsed CSR.
2 This is an active element before the CCP and will be resolved
3 there.
- 4 3) Nondiscriminatory access does not require that all LSRs be
5 submitted electronically. Some of BellSouth's services, primarily
6 complex services, require involve manual handling.
- 7 4) BellSouth is providing nondiscriminatory access for ALECs to its
8 OSS functions. Nondiscriminatory access does not require that all
9 LSRs be submitted electronically and flow through BellSouth's
10 systems without manual intervention.

11

12 ***Issue 32: Should BellSouth provide AT&T with the ability to access, via***
13 ***EBI/ECTA, the full functionality available to BellSouth from TAFI and***
14 ***WFA?***

15

16 Q. ON PAGE 94, MR. BRADBURY STATED THAT "FOR MANY (BUT NOT
17 ALL) SERVICES ASSOCIATED WITH A TELEPHONE NUMBER,
18 BELLSOUTH OFFERS ACCESS TO ITS PROPRIETARY TROUBLE
19 ANALYSIS FACILITATION INTERFACE (TAFI)". DO YOU AGREE?
20

21 A. No. The ALEC can use TAFI to enter a trouble report for ALL telephone
22 number- (TN) based services. The objective of TAFI is to 'screen' (test,
23 analyze, repair or route) each trouble report before entering the report into
24 the LMOS. As pointed out in Section 3.2 (Limitations) of the CLEC-TAFI
25 User Guide (Issue 5), there are a few TN-based services that TAFI does

1 not screen. However, the user can still enter the report and manually
2 route it to a Maintenance Administrator for screening. This functionality is
3 exactly the same for the version of TAFI used by BellSouth's retail units.
4 (Note: Section 3.2.1 of the Guide indicates that stand-alone UNE ports are
5 not supported in TAFI. This item is now inventoried in LMOS and
6 supported by TAFI, and the next issue of the Guide will remove this
7 statement.)

8
9 Q. ON PAGE 95, MR. BRADBURY PRESENTS HIS ARGUMENT THAT
10 NEITHER TAFI NOR ECTA PROVIDES NONDISCRIMINATORY
11 ACCESS TO BELLSOUTH'S OSS FOR MAINTENANCE AND REPAIR.
12 DO YOU AGREE WITH HIS ASSESSMENT?

13
14 A. No. The Telecommunications Act requires ILECs to provide ALECs with
15 the ability to enter trouble reports into the ILECs' OSS in substantially the
16 same time and manner as is enjoyed by the ILECs' personnel entering
17 trouble reports into the OSS. Thus, 'same time' equates to response time,
18 and 'same manner' equates to access to the same functionality. The
19 response time and functionality of CLEC-TAFI is the same as the version
20 of TAFI used by BellSouth's retail units. (Actually the CLEC-TAFI
21 functionality is superior to BellSouth's TAFI since it can process both
22 Residence and Business trouble reports on the same processor.)

1 Therefore, CLEC-TAFI provides nondiscriminatory access to BellSouth's
2 OSSs.

3
4 BellSouth also supports interfaces built to National standards and for
5 Maintenance and Repair functions, this interface is ECTA. The
6 functionality of ECTA is limited by the National standards to providing the
7 ALEC the ability to: (1) enter a trouble report; (2) modify an existing
8 trouble report; (3) close an existing trouble report; (4) obtain trouble report
9 status information; and, (5) obtain mechanized loop test ("MLT") data on a
10 line without entering a trouble report. BellSouth does not use ECTA
11 internally to submit trouble reports to its OSSs so there is not an
12 analogous BellSouth retail process for comparison of the response time
13 and functionality. However, the response time and functionality of ECTA
14 are clearly defined in the ECTA Joint Implementation Agreement (JIA)
15 which is agreed to by each ALEC using ECTA. (AT&T agreed to and
16 signed an ECTA JIA in 1997.) The current "boiler plate" JIA is available
17 on the web at
18 http://www.interconnection.bellsouth.com/guides/clec_ar.html.

19
20 Mr. Bradbury contends that "when an ALEC submits a trouble report via
21 TAFI, that order must be manually entered into the ALEC's own internal
22 OSS". Please note that the Telecommunications Act does not require the
23 ALEC to enter a report into its own OSS. It only addresses the ILECs'

1 responsibility of providing nondiscriminatory access to its OSS. Therefore,
2 performing "costly and error-prone double entry" (for trouble reports) is a
3 business decision of the ALEC and is not a requirement of the
4 Telecommunications Act. Hence, this does not impact the definition of
5 nondiscriminatory access.

6
7 Q. IN YOUR PREVIOUS ANSWER, YOU INDICATED THAT ECTA IS BUILT
8 TO NATIONAL STANDARDS. WHO DEFINES THESE NATIONAL
9 STANDARDS TO INSURE THAT THE NEEDS OF THE ALECS ARE
10 ADDRESSED?

11
12 A. ECTA is built to the American National Standards Institute's (ANSI)
13 standards. The Electronic Communications Implementation Committee
14 (ECIC) developed these standards. The ECIC is a subcommittee of the
15 Telecommunications Industry Forum ("TCIF"), which was established to
16 foster the implementation of electronic communications, particularly with
17 regard to trouble administration. AT&T and BellSouth (along with most
18 ILECs and interested ALECs) have active participation in ECIC activities
19 including the establishment of new standards. Therefore, through ECIC,
20 ALECs have the ability to define ECTA functionality.

21

1 Q. ON PAGE 96, MR. BRADBURY INDICATED THAT "ALEC'S CANNOT
2 INTEGRATE TAFI WITH THEIR OWN 'BACK OFFICE' SYSTEMS AS
3 BELLSOUTH DOES". IS HE CORRECT?
4

5 A. No. TAFI cannot be integrated for either user community. TAFI is a front-
6 end human-to-machine user interface that obtains data from various OSSs
7 in order to test, analyze, repair or route a given trouble report. BellSouth's
8 OSSs are not dependent upon TAFI for their operation. If TAFI were
9 pulled from the infrastructure, the remaining systems (i.e., LMOS, CRIS,
10 Predictor, MARCH) would work fine. Therefore, TAFI is not integrated
11 with these systems – it only accesses these systems.
12

13 Once the proper determination is made, TAFI enters the trouble report into
14 LMOS for subsequent processing. (If the trouble condition was resolved,
15 TAFI would enter, and then close, the LMOS report.) This is true
16 regardless of the party that generated the trouble report – the ALEC or
17 BellSouth. Although LMOS is BellSouth's maintenance OSS, ALECs
18 using TAFI have the ability to view LMOS trouble status and LMOS trouble
19 history data for specific end-users just like BellSouth users can. The
20 argument for double-entry was addressed earlier and remains moot.
21

22 The statement made by BellSouth in the Louisiana 271 application before
23 the FCC was misinterpreted by AT&T. The statement "BellSouth

1 concedes that it derives superior integration capabilities from TAFI” means
2 that TAFI obtains data from various OSSs for a given trouble condition
3 and then mechanically integrates this information to form the analysis
4 determining the correct course of action to effect a repair. TAFI's
5 capability of “automatically interacting with other systems as appropriate”
6 is correct for both CLEC-TAFI and the version of TAFI used by BellSouth's
7 retail units. This statement just means that TAFI obtains data from the
8 appropriate OSSs for a given trouble condition. For example, if the
9 customer were reporting no dial tone, TAFI would execute an MLT to
10 check the line. For this report, TAFI would not verify features programmed
11 in the central office switch. On the other hand, if the customer indicated
12 that their Call Waiting feature didn't work, TAFI would not execute an MLT.

13
14 Q. ON PAGE 97, MR. BRADBURY PROVIDES HIS ARGUMENTS FOR A
15 ‘FULL FUNCTION MACHINE-TO-MACHINE MAINTENANCE AND
16 REPAIR INTERFACE’. WHAT COMMENTS DO YOU HAVE?

17
18 A. Mr. Bradbury says, “if an ALEC wants to issue credits to a customer who
19 had experienced recurring repairs, it would need access to billing data and
20 repair histories.” BellSouth's OSSs only track what items were sold to the
21 ALECs and not what the ALEC sold to their end user and for what price.
22 Therefore, the ALEC must rely on its own billing system. Trouble history
23 data has been available via TAFI since its introduction. (Note: ECIC is

1 currently evaluating a methodology for obtaining Trouble History data over
2 ECTA. Once the standard is approved, BellSouth will deploy it if
3 requested to do so by those ALECs using the interface.)
4

5 Mr. Bradbury further states on Page 97 that "ALECs must be able to add
6 or change service and adjust calling plans for customers, and require
7 access to customer service record information to keep contact information
8 up-to-date." Adding or changing service is the result of provisioning
9 initiated by the submission of a service request, which is part of the
10 ordering process. Accessing customer service record data is available via
11 the pre-ordering process. Both pre-ordering and ordering functions are
12 mechanically available via the machine-to-machine electronic interface
13 called Telecommunications Access Gateway ("TAG").
14

15 Using Mr. Bradbury's numbers from Page 98, 30 months after market
16 entry (and using a 6%-per-month trouble rate), 60,000 repair calls per
17 month indicates an installed base of 1,000,000 lines for AT&T in
18 BellSouth's area. As information, BellSouth's retail units process between
19 1.5 and 2.0 *million* TAFI reports per month with no problems.
20

21 To avoid the 'double-entry' problem to which Mr. Bradbury keeps referring,
22 AT&T could re-establish their use of ECTA and enjoy the functionality
23 provided by the National Standards. As information, AT&T was the first

1 ALEC to build an interface to BellSouth's ECTA system. That interface
2 went into production on March 18, 1998. On April 9, 1998 (three weeks
3 later), AT&T suspended the service.

4
5 Q. ON PAGE 99, MR. BRADBURY RECOUNTS AT&T'S "NUMEROUS"
6 REQUESTS FOR BELL SOUTH TO PROVIDE FULL TAFI
7 FUNCTIONALITY OVER THE ECTA INTERFACE. PLEASE PROVIDE
8 YOUR COMMENTS ON THIS TOPIC.

9
10 A. AT&T requested that BellSouth provide full TAFI functionality via the
11 ECTA interface on numerous occasions. BellSouth agrees that providing
12 enhanced functionality via a machine-to-machine interface would be
13 attractive to the ALEC community. However, ECTA is not the vehicle to
14 deliver this functionality since it adheres to the National standards for
15 exchanging maintenance and repair information – and these standards do
16 not support all of the data elements required (A 'data element' is defined
17 as a specific field of information in a data transmission. For example,
18 ANSI standard 262 defines the methodology for obtaining results of a
19 mechanized loop test, and the corresponding string of data bits containing
20 those results is the MLT data element.). In addition, the standards do not
21 provide a vehicle for BellSouth to deliver the interactive dialogue and
22 analysis rules required for TAFI functionality.

23

1 Also on Page 99, Mr. Bradbury misrepresents issues regarding the
2 Georgia PSC Order, Docket No. 6352U (July 2, 1996). At line 14, he
3 says, "BellSouth stated that it 'has investigated the possibility of adding to
4 the existing [EBI] gateway a system called TAFI". What BellSouth
5 actually said was that it had investigated the possibility of adding its
6 internally developed and proprietary system called TAFI to the list of
7 interfaces available to ALECs to report their end-user trouble reports. At
8 that time, BellSouth did not have the ECTA maintenance and repair
9 interfaces available for ALECs. However, special development work
10 would have to be done to TAFI (i.e., ensuring that a given ALEC could
11 only access records pertaining to their customers, etc.) before it could be
12 made available to the ALEC community. Beginning at line 17, he further
13 states that the "Georgia PSC ordered BellSouth to complete 'the TAFI
14 enhancements to allow full operation of the required access by March 31,
15 1967'". While BellSouth thinks Mr. Bradbury meant 1997, this order was
16 to make TAFI available to ALECs and not to put TAFI functionality into
17 ECTA. BellSouth satisfied this Georgia PSC order on March 28, 1997
18 when the first ALEC generated a trouble report via CLEC-TAFI.

19
20 On page 100, Mr. Bradbury refers to a comment made by BellSouth's Mr.
21 William Stacy where Mr. Stacy stated that "BellSouth could provide initial
22 functionality in 13 months and complete functionality in 18 months". What
23 Mr. Stacy was referring to was a non-standard arrangement to develop

1 and deliver 'TAFI-like' functionality over a machine-to-machine interface –
2 not that BellSouth could provide this functionality over the existing ECTA
3 interface. If AT&T wanted to pursue such an interface, then AT&T would
4 have to submit a BonaFide Request ("BFR"). Nearly two years after Mr.
5 Stacy's comment, AT&T has not submitted a BFR (for which it would have
6 to pay, by the way) and, therefore, BellSouth has not pursued its
7 development.

8
9 On page 101, Mr. Bradbury states that "AT&T submitted a formal change
10 request through the Interim Change Control Process on April 18, 2000,
11 asking for TAFI functionality via the ECTA interface". BellSouth replied to
12 this request on June 29, 2000 (Exhibit RMP-25) and explained in detail
13 why it was not possible to implement this request.

14
15 Q. STARTING ON PAGE 101, MR. BRADBURY PROVIDES HIS
16 COMMENTS REGARDING AN INFORMAL PRESENTATION MADE BY
17 BELLSOUTH AT THE OCTOBER 25, 2000 CHANGE CONTROL
18 STATUS MEETING. PLEASE PROVIDE YOUR COMMENTS.

19
20 A. Mr. Piatkowski (BellSouth) used this forum to share the status of several
21 development initiatives that *may* someday have an impact on the ALEC
22 community. The intent was to provide the audience with a preview of what
23 *may* become available. As stated by Mr. Bradbury, Mr. Piatkowski
24 discussed three systems: DLEC-TAFI, CPSS-TA and E-Repair. Mr.
25 Piatkowski was very deliberate in his presentation to state that BellSouth

1 was developing CPSS-TA and E-Repair for the non-ALEC user
2 communities and that these systems *may* be extended to support the
3 ALEC community in the future. DLEC-TAFI was specifically developed for
4 the Data Local Exchange Carrier (DLEC) community that uses the line-
5 sharing technique for delivering access to high-speed data transmission.

6
7 Mr. Bradbury's comments on lines 17 through 22 on page 101 are
8 incorrect. DLEC-TAFI is not a unique system. It is an enhancement to the
9 CLEC-TAFI system. By definition, a DLEC is a type of ALEC that provides
10 high-speed data through the line-sharing methodology. This CLEC-TAFI
11 enhancement **does not** support BellSouth's retail ADSL product line **nor**
12 does it support ALEC xDSL trouble reports. There has **never been** a
13 retail version "available to BellSouth for some time but is only now being
14 demonstrated to A/DLECs." This CLEC-TAFI enhancement was
15 developed at the request of the DLEC Collaborative - a group of DLECs
16 working with BellSouth on line-sharing.

17
18 Mr. Bradbury's comments regarding CPSS-TA (the Circuit Provisioning
19 Status System – Trouble Administration) on page 102 are correct. The
20 interexchange carrier user pilot was successful and BellSouth has
21 targeted an offering for CPSS-TA to the ALEC community during the first
22 quarter of 2001.

23
24 The future evolution of E-Repair is unknown at this time. Mr. Piatkowski
25 indicated that the initial version of this system – built for BellSouth's large

1 retail customers – would only provide a view of trouble-report status
2 information (from both LMOS and WFA) via the Internet. The pilot for this
3 initial system, using several select retail customers, is scheduled to begin
4 in January 2001. The results of this trial will determine its future.

5 Assuming that the trial is successful and E-Repair becomes a viable
6 product, ALECs would have access.

7
8 The E-Repair developers are looking at the possibly of expanding the
9 functionality of the system to include trouble entry. If this effort is
10 approved (and funded), it would be a “Phase-II” initiative. Since E-Repair
11 accesses both LMOS and WFA, and if BellSouth expanded its
12 functionality to include trouble entry, then it would be logical to migrate
13 CLEC-TAFI and CPSS-TA users to a single system. However, there are
14 no firm plans for E-Repair beyond the initial pilot.

15
16 Q. ON PAGE 103, MR. BRADBURY EXPRESSES SOME CONCERN OVER
17 THE PROCESS USED TO DEVELOP DLEC TAFI, CPSS-TA AND E-
18 REPAIR. WHAT COMMENTS DO YOU HAVE?

19
20 A. As Mr. Piatkowski pointed out, the CPSS-TA and E-Repair initiatives were
21 developed for non-ALEC user communities and, therefore, the
22 development of those systems are not subject to the (ALEC) Change
23 Control Process. When – and if – these systems are made available to
24 ALECs, ALECs will certainly have the ability to submit suggestions for the
25 system’s evolution.

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The DLEC enhancements to TAFI were developed at the request of DLECs participating in the DLEC Collaborative meetings at BellSouth. The DLEC Collaborative is an ad hoc subcommittee of the CCP. The participating DLECs are also members of the CCP, and had no issue with this development taking place within the DLEC Collaborative. In fact, Mr. Piatkowski's presentation to the CCP was in keeping with BellSouth's intent to keep the CCP informed of developments in the DLEC Collaborative project.

I must take exception to Mr. Bradbury's comment at line 10 on page 103 – "As I explained above, AT&T has a long-standing request for a full-function maintenance and repair interface, and has been negotiating in good faith with BellSouth regarding this issue for over a year, yet BellSouth failed to raise these projects as a possible solution." AT&T has been requesting that BellSouth provide "TAFI Functionality" via the machine-to-machine interface ECTA. On numerous occasions, the latest being the denial of Change Control Request CR0012 (Exhibit RMP-25), BellSouth has explained to AT&T that the ECTA architecture, built to the National standards, is not compatible with 'TAFI functionality'. BellSouth has also told AT&T that we would be happy to design and build a **non-standard** machine-to-machine maintenance and repair interface for them. However, AT&T has failed to submit the required BFR to initiate this effort, presumably because AT&T doesn't want to pay for such a system.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR ISSUE 32.

1

2 A. BellSouth provides ALECs nondiscriminatory access to maintenance and
3 repair functionality through the CLEC-TAFI and ECTA interfaces, as well
4 as available manual processes. BellSouth is in compliance with the
5 Telecommunications Act and is not required to provide any additional
6 maintenance and repair interfaces. If AT&T desires a non-industry
7 standard integrateable machine-to-machine interface that will provide
8 TAFI functionality, then AT&T should submit a BFR and pay for the design
9 and development of such an interface.

10

11 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

12

13 A. Yes.

1 **BY MR. LACKEY:**

2 **Q Mr. Pate, how many exhibits do you have?**

3 **A I have 24, but let me check and make sure I**
4 **haven't lost a tab here. This book has gotten rather**
5 **thick. I did find Number 25, it just was not tabbed. I**
6 **apologize.**

7 **Q So I was right and you were wrong?**

8 **A That is usually the case.**

9 **MR. LACKEY: Mr. Chairman, could I have his**
10 **seven rebuttal exhibits and his 18 exhibits attached to**
11 **his direct testimony marked as Composite Exhibit 24.**

12 **CHAIRMAN JACOBS: Show it marked as that.**
13 **(Exhibit 24 marked for identification.)**

14 **MR. LACKEY: Thank you.**

15 **BY MR. LACKEY:**

16 **Q Do you have any changes or corrections to your**
17 **25 exhibits?**

18 **A No, I do not.**

19 **Q Do you have a brief summary of your direct and**
20 **rebuttal testimony, Mr. Pate?**

21 **A Yes, I do. Good afternoon. The purpose of my**
22 **testimony is to provide BellSouth's positions on Issues**
23 **Number 25, 30, 31, and 32 raised by AT&T in its petition**
24 **for arbitration filed with the Commission. While my**
25 **testimony covers all these issues, I will direct my**

1 summary comments to Issue 30, 31, and 32.

2 Issue 30 deals with the change control process.

3 As you know, we have various interfaces that ALECs use to
4 interact with our operational systems. The ALECs use
5 these interfaces to accomplish various functions such as
6 to get preordering and ordering information from BellSouth
7 and to track their orders. Obviously changes in these
8 interfaces are important to both BellSouth and the ALECs.
9 As a result, there is a process called the change control
10 process, or CCP, which is used to notify ALECs of changes
11 in the interfaces and to resolve issues concerning the
12 interfaces.

13 AT&T has raised some issues, actually subissues,
14 that relate to the specific operations of the change
15 control process. While I will address some of those
16 concerns in my summary, I want to first point out that the
17 content of the CCP is not an appropriate issue for
18 arbitration with an individual ALEC. There are over 160
19 operational ALECs in Florida, and approximately 300 for
20 BellSouth's region with approximately 100 registered as
21 participants in the CCP. The CCP itself was established
22 through collaboration between interested ALECs, including
23 AT&T and BellSouth. Any changes submitted through this
24 process are handled collaboratively by all the
25 participating ALECs and BellSouth.

1 **By proposing to arbitrate the various subissues**
2 **that it has raised, AT&T is effectively excluding other**
3 **ALECs that have a very real interest in how the change**
4 **control process works. This is not insignificant because**
5 **even AT&T will have to admit that not all of the ALECs**
6 **that participate in the process agree with everything AT&T**
7 **wants. Moreover, the operational support systems to which**
8 **CCP applies are regional systems. AT&T is going from**
9 **state-to-state asking individual commissions to make**
10 **changes in the process that effect ALECs that don't even**
11 **operate in every state. This is simply not appropriate.**
12 **The Commission should send AT&T back to the existing forum**
13 **that addresses changes in these processes.**

14 **If that were not enough reason to not take up**
15 **the issues with the CCP, I would also point out that we**
16 **are currently dealing with Version 2.1 of the CCP**
17 **documented processes, which was recently publish on**
18 **February 9th, 2001. Version 2.1 incorporates ALEC input**
19 **from a recent ballot process involving 34 items. The**
20 **version Mr. Bradbury filed with his testimony was dated**
21 **October 27th, 2000, and is a modified document of the base**
22 **line Version 2.0 with various annotations for suggested**
23 **changes. This is an evolving process. In attempting to**
24 **make discreet changes in the process as AT&T requests is**
25 **like trying to step into a river at the same place twice.**

1 It can't do really be done.

2 With that said, BellSouth has worked with the
3 participating ALECs over the course of the past several
4 months to modify the CCP. These modifications are
5 memorialized in the current CCP document Version 2.1.
6 This document deals comprehensively with all the
7 situations raised by AT&T. It should be left to the
8 change control process where the document now resides to
9 resolve this matter.

10 Issue 31 actually deals -- concerns, rather,
11 certain three subissues. Specifically, the three issues
12 are, one, the parsing of customer service records, CSRs,
13 as part of preordering; two, electronic ordering of all
14 services and elements; and, three, electronic processing
15 after electronic ordering without subsequent manual
16 processing by BellSouth personnel.

17 The issue of parsing CSRs has been placed before
18 the CCP by AT&T and a team has been formed and has met to
19 analyze AT&T's request and will provide its findings and
20 recommendation to the CCP, which is the appropriate forum
21 for resolution of this item. However, let the record be
22 clear that BellSouth provides ALECs the CSR data in the
23 same manner as it provides it to itself for use by
24 BellSouth retail units. Additionally, the CSR data
25 delivered to ALECs via the telecommunications access

1 gateway, TAG, can be parsed to the level needed to submit
2 an order, just as BellSouth does for its retail units.

3 The other two issues are actually more
4 significant. AT&T is attempting to use the guise of the
5 CCP to inappropriately arbitrate these issues. First,
6 AT&T is asking that BellSouth provide it the ability to
7 submit all LSRs electronically; and, second, that all of
8 these orders flow through BellSouth's OSS without any
9 human intervention. Not only is this unreasonable, it is
10 unrealistic in today's environment.

11 As I state in my testimony, nondiscriminatory
12 access does not require that all LSRs be submitted
13 electronically. Even the FCC recognizes that some complex
14 orders have to be submitted manually. Further, in the
15 same vein, even the FCC doesn't require that all
16 electronically submitted orders have to flow through
17 BellSouth's systems without manual intervention.
18 Nondiscriminatory access to certain functions for ALECs
19 may legitimately involve manual processes. Therefore,
20 these processes are in compliance with the Act and the
21 FCC's rules.

22 I would note to put a point on this that the FCC
23 has approved Southwestern Bell Telephone Company's
24 application to provide in-region interLATA services in
25 Texas as well as approved Bell Atlantic's application for

1 New York, and in both cases recognized that some services
2 could be properly designed to fall out for manual
3 processing.

4 In Issue 32, AT&T states that it wants BellSouth
5 to make the trouble analysis and facilitation interface,
6 TAFI, functionality available in the industry standard
7 electronic communications trouble administration, ECTA,
8 gateway interface. What AT&T really wants is an entirely
9 new non-industry standard machine-to-machine maintenance
10 and repair interface. This simply isn't required.

11 Through TAFI, BellSouth provides AT&T access to the same
12 system used by BellSouth's own retail units. AT&T's
13 representatives who use TAFI see the same screens, can
14 perform the same functions, and have absolutely
15 nondiscriminatory access to BellSouth's maintenance and
16 repair system.

17 What AT&T complains about is that it can't be
18 integrated into AT&T's back office systems. That may well
19 be true, but as the FCC has said in Texas and in New York,
20 that is not necessary as long as AT&T has the same access
21 to BellSouth's maintenance and repair systems as does
22 BellSouth's retail units. It does.

23 If AT&T actually wants a machine-to-machine
24 interface for maintenance and repair, it can ask for one.
25 And as long as it is willing to pay for the development of

1 such a system, it can have one. Instead, AT&T is simply
2 asking this Commission to provide AT&T with more than it
3 is entitled to, and to provide this service at no cost to
4 AT&T.

5 If you can get away with that kind of approach,
6 I suppose it makes good business sense. But in this case,
7 parity doesn't require such a system. And if AT&T wants
8 it, it should pay for it.

9 Thank you. This concludes my summary.

10 MR. LACKEY: Mr. Pate is available.

11 MS. RULE: Before beginning, I have handed out
12 three exhibits, and I would ask if BellSouth would be
13 willing to stipulate these three in to save time. They
14 consist of some BellSouth responses to the second set of
15 interrogatories posed by AT&T, and the fourth set, and one
16 document request.

17 MR. LACKEY: I haven't turned my way all the way
18 through them. Are they complete sets of the interrogatory
19 answers and none of them are proprietary?

20 MS. RULE: None of them are proprietary. They
21 are complete sets of answers to that particular
22 interrogatory. So it's not all of set two or all of set
23 four, but it is all of the answers to, for example, Number
24 28.

25 MR. LACKEY: Mr. Chairman, as long as they are

1 not proprietary and they are complete, BellSouth has no
2 objection.

3 MS. RULE: I now would like them identified. I
4 have cover sheets on each one. The first cover sheet is
5 BellSouth's responses to AT&T's second set of
6 interrogatories, and there is a series of numbers. And I
7 would like that one identified as -- I think that is 26.

8 CHAIRMAN JACOBS: 25, I believe.

9 MS. RULE: 25, thank you. And then the other
10 set of interrogatories, Number 26, and the POD, Number 27.
11 And I'm sure it will relief everybody to know I don't
12 intend to ask questions about these documents.

13 (Exhibits 25, 26 and 27 marked for
14 identification.)

15 CROSS-EXAMINATION

16 BY MS. RULE:

17 Q Mr. Pate, good evening.

18 A Good evening.

19 Q You were here during Mr. Ruscilli's testimony,
20 weren't you?

21 A Yes, I was.

22 Q And he kind of punted something to you about an
23 ordering question, didn't he?

24 A He did punt something, yes.

25 Q And the way I heard it, he was explaining

1 **BellSouth's position that if AT&T wins a BellSouth POTS**
2 **customer and wants to serve that customer over the UNE**
3 **platform, that BellSouth will only allow that to happen as**
4 **a switch as is. Did we hear that the same way?**

5 **A If they want to convert it from a BellSouth to a**
6 **UNE-P it would be switch as is.**

7 **Q Okay. And a switch as is is where the BellSouth**
8 **customer comes over to AT&T's service with exactly the**
9 **same features and service, right?**

10 **A Yes, that is what I mean by switch as is. And**
11 **if they want to change those features or services then it**
12 **would be modified, we call it a switch as specified, or**
13 **they even refer to it as a new conversion today, a new**
14 **term we have to get used to.**

15 **Q Okay. And let's assume that customer doesn't**
16 **want to switch as is, they want to add one more feature.**
17 **Now, I think the question Mr. Ruscilli punted to you was**
18 **whether that had to be done in one order, that is the**
19 **switch as is order, or whether it had to be done in two**
20 **orders, the switch as is order and then another order for**
21 **the new feature. Which is it?**

22 **A That should be done in one order. One local**
23 **service request. That's what I said when I referred to**
24 **what might be two terms bounced around, a switch as**
25 **specified and now our operations group refers to that more**

1 to a conversion new. But through that process, you
2 designate that transaction, that end user customer, you
3 also designate what feature is it you are changing since
4 it is one local service request.

5 Q Okay. I'm confused because in prior discussions
6 I think we learned that a switch as is is one type of
7 order, right?

8 A Correct.

9 Q And a switch as specified, which would be the
10 current service plus one more service, or one more
11 feature, would be a different kind of order, right?

12 A It is, it is. I'm sorry how I confused you.

13 Q Okay. So I guess I'm thinking those are two
14 separate individual types of orders. I'm not sure how you
15 can make them into one. How can it be both a switch as is
16 and a switch as specified in one order?

17 A Well, we developed the programming where you
18 submit the local service request with a designation as to
19 what you want to change. And then as a result of that,
20 BellSouth's systems would do whatever individual service
21 order is necessary to make that transaction happen. But
22 from you, as a CLEC customer, it is only one transmission
23 that you would submit.

24 Q Was that negotiated with AT&T, that process?

25 A Not that I'm aware of. I mean, that was the

1 process we established as just part of putting in place
2 how you would do these types of conversions.

3 Q Would it surprise you to find out that this is
4 the first anybody has heard that that could be done in one
5 order?

6 A Yes, that does surprise me. And if you have
7 heard something different, or if you have a particular
8 situation where that is not the case, please share it with
9 me and I will be glad to further research it for you.

10 Q If indeed it turned out it had to be done in two
11 separate orders, which was AT&T's understanding, that you
12 had to switch the customer as is and then add the
13 features, isn't that also consistent with what Mr.
14 Ruscilli was testifying about?

15 A Well, I don't think Mr. Ruscilli was really the
16 expert in that area, and I think he even stated so. So
17 whatever he provided you with, and I don't recall exactly
18 what his words were, but I'm telling you from my
19 experience working with it, as more the expert in this
20 area, it is my understanding as I sit here today that that
21 is done over one local service request submitted. And I
22 will stand corrected if you show me something otherwise,
23 but I'm not aware of such as I sit here today.

24 Q Well, let's move on to your testimony, then.
25 And you, I think, have pretty accurately stated that AT&T

1 wants to be able to submit electronic orders for all
2 services and elements, correct?

3 A Yes.

4 Q And also wants BellSouth to process those orders
5 electronically without subsequent manual handling, right?

6 A Yes.

7 Q Okay. And we have been through this before and
8 we have agreed that electronic ordering is, generally
9 speaking, cheaper and faster than manual ordering, right?

10 A Most definitely, yes.

11 Q And less prone to errors?

12 A Certainly.

13 Q And that processes that are cheaper and faster
14 and less prone to error generally benefit competition,
15 right?

16 A Well, from the standpoint -- yes, I agree it
17 would benefit competition. But there is also a cost
18 associated with certain transactions as to where that is
19 the most economical way to approach it just due to the
20 volume of the transaction as well as the complexity and,
21 therefore, the resulting associated cost for that
22 programming.

23 Q Well, let's talk on a statewide level. If
24 ALECs, in general, had to submit manual orders for things
25 versus electronic orders, and those manual orders were

1 manually processed versus electronic processing, it would
2 take a lot longer to switch over a significant number of
3 customers to ALECs, wouldn't it?

4 A Certainly. That's why we have developed the
5 systems to accommodate that. And I think somebody has
6 already mentioned earlier today and as a last month
7 results I saw 88 percent of the transactions we are
8 receiving are being submitted electronically.

9 Q And most of those are POTS resale, aren't they?

10 A We have seen a big growth in the UNE platform a
11 lot because of UNE-P. It is probably still most from
12 about 70 to 75 percent would be in the POTS resale
13 environment, but UNE-P has grown dramatically over this
14 year.

15 Q Can you tell me what ROS is?

16 A ROS is the regional ordering system, that is the
17 retail ordering system used in our business retail units.

18 Q And BellSouth basically can order every service
19 an element that it wants to sell to its retail business
20 customers through ROS, right?

21 A Let me answer it for you this way, that is the
22 system they use to input the order, to make sure we are
23 talking the same terms. So that is what they use to
24 submit the order into the BellSouth systems for further
25 provisioning. It goes into the service order

1 **communications system like the CLECs' orders eventually**
2 **get to.**

3 **Q So if I am a BellSouth service rep, and I am,**
4 **let's say, talking on the phone to a business customer,**
5 **and I gather all the information necessary to find out**
6 **what that customer wants to order, at some point in time**
7 **when I have done all of my preordering work, I can turn to**
8 **ROS and type in the order, correct?**

9 **A Yes. And for a small business transaction they**
10 **may be able to do it while the end user is right their on**
11 **the phone. However, for complex transactions there is a**
12 **lot of preordering activity associated with gathering**
13 **that. And what you really have at that point in time is a**
14 **representative who may not even be that familiar with the**
15 **order doing data entry utilizing ROS and the screens**
16 **associated with it to submit that transaction. You have**
17 **got to get it in there somehow, and that is the tool they**
18 **use.**

19 **Q Okay. So at the end of the day whenever the**
20 **preordering work is done, somebody who may not be the same**
21 **service rep who talked to the business owner, turns to ROS**
22 **and types in an order, correct?**

23 **A That is correct.**

24 **Q And then that order then is electronically sent**
25 **to SOCS, right?**

1 **A** **It is electronically transmitted, yes, sent to**
2 **service order communications systems, SOCS, the same**
3 **system where all orders, even from the consumer unit for**
4 **retail as well as all the ALECs eventually land up.**

5 **Q** **Okay. And that is exactly what the function**
6 **that AT&T is asking for, isn't it? To type an order into**
7 **an ordering system that then produces a service order,**
8 **right?**

9 **A** **Well, yes, they are asking for that function and**
10 **that function exists. The only difference is who is doing**
11 **that input. And, you know, from AT&T's position they**
12 **would like able to do that input. But the way it works**
13 **today for these complex services, just as I have just**
14 **described, a representative from our retail unit using the**
15 **ROS system is making that input for a complex product**
16 **directly from a paper order that has been comprised from**
17 **the gathering of a lot of information.**

18 **In the case of these complex orders, almost the**
19 **exact same process has been established for AT&T and other**
20 **ALECs to gather that information and submit that order.**
21 **The only difference is who actually does that input. And**
22 **in this case for the State of Florida, the input is done**
23 **using a system called DOE, and that is accomplished in the**
24 **local carrier service center which is where the BellSouth**
25 **representative resides and does that input.**

1 **Q** **So, basically then, if the ALEC, if AT&T wants**
2 **to order that service, they have to do the same**
3 **preordering work that BellSouth does, but then they write**
4 **it down and give it to BellSouth and BellSouth does the**
5 **ordering, correct?**

6 **A** **Correct. Just like the BellSouth retail unit**
7 **that does that same work has to write it down and gives it**
8 **to the BellSouth rep there in the appropriate office for**
9 **the business unit.**

10 **Q** **But at the end of the day, BellSouth can enter**
11 **an order electronically that electronically produces a**
12 **service order, right, and the ALECs can't?**

13 **A** **That is correct. But let me add one thing just**
14 **so it is clear here to the Commission and everybody**
15 **involved in this process. There is one major difference.**
16 **I agree they are submitting an electronic order, but the**
17 **major difference is for the ALEC community we are dealing**
18 **with a transaction that involves what is referred to as**
19 **the local service request, the LSR. That is an industry**
20 **standard format that these orders, these requests have to**
21 **be submitted to us.**

22 **And the systems that are in place where they can**
23 **mechanically process this by direct input from the ALECs**
24 **actually performs a function of converting that to a**
25 **service order format that is accepted by SOCS. For those**

1 complex orders where that programming has not been
2 developed, that is entered using DOE, as I said, for the
3 LCSC in a service order format.

4 In comparison with ROS for our business retail
5 unit, they don't use the LSR. They do just like the rep
6 does in the LCSC. They input it in that service order
7 format. That is a major difference here.

8 Q And that is exactly the difference that AT&T
9 wants changed, right?

10 A AT&T, as I understand it, would like to have all
11 of that be able to be submitted on a local service request
12 format.

13 Q Thank you. Let's move on to the change control
14 process. And I believe in your testimony and in your
15 summary you said that you thought AT&T should be asking
16 for changes to the change control process through the
17 process itself?

18 A Yes, I did.

19 Q Okay. In fact, you said the issue was
20 inappropriate for arbitration, right?

21 A Yes, I did.

22 Q Okay. Can you clarify for me, are you saying
23 that AT&T is not entitled under the law to ask the
24 Commission to arbitrate the issue?

25 A First, let me answer from the standpoint that

1 I'm not an attorney, so I don't really know what they are
2 entitled to from a legal perspective. But I would say
3 just from my personal view, I guess they have the ability
4 to submit anything they wish to this Commission that this
5 Commission is willing to hear. What I'm just trying to
6 state is I don't think it is an appropriate issue for
7 arbitration because of the regional nature of the systems
8 it impacts and the other ALECs this can't be here to
9 represent themselves.

10 Q Okay. Well, then are you saying that we can
11 ask, but the Commission really shouldn't be making this
12 decision?

13 A From my position, BellSouth's position, rather,
14 I'm saying, yes, it is inappropriate for arbitration,
15 therefore, I would request that this Commission direct
16 this issue right back to the change control process which
17 has shown progress in dealing with this and let them
18 handle it.

19 MS. RULE: Okay. I would like to hand out an
20 exhibit, and I with like an exhibit number assigned to it,
21 please. And, I'm sorry, I have lost track of those
22 numbers.

23 CHAIRMAN JACOBS: This will be Exhibit 28.

24 MS. RULE: Thank you.

25 CHAIRMAN JACOBS: And the title?

1 **MR. LACKEY:** I'm sorry, did you ask for an
2 exhibit number for this?

3 **MS. RULE:** Yes, sir.

4 **MR. LACKEY:** Is this not on the official
5 recognition list?

6 **MS. RULE:** Yes. I'm happy to cross him on it
7 without putting it in evidence, no problem.

8 **MR. LACKEY:** I thought that was the point of the
9 official recognition list.

10 **CHAIRMAN JACOBS:** If it's okay with you guys, it
11 sounds like it's a winner.

12 **MS. RULE:** Absolutely.

13 **BY MS. RULE:**

14 **Q** Okay. Now, this is an order from the United
15 States District Court, Northern District of Florida, and
16 it is dated June 6th, 2000, right?

17 **A** I'm looking for the date. I see the date, yes.

18 **Q** Okay. And I have marked for you some language
19 on Page 33. Incidentally, you have seen this order
20 before, haven't you? Well, I think we gave away your
21 copy, but we will switch it back.

22 **A** Okay.

23 **Q** Okay. Before we move back there, let's look at
24 the first page here. Could you read that second – I'm
25 sorry, the third sentence here?

1 **A Third sentence on the first page?**

2 **Q Yes.**

3 **A And that sentence starts on the third line, "The**
4 **Florida Public Service Commission's final order on**
5 **arbitration as amended is declared invalid as set forth in**
6 **the order on merits entered June 6th, 2000."**

7 **Q Okay. So this is the federal court's review of**
8 **an arbitration order, right?**

9 **A Yes, that is what it is.**

10 **Q I would like for you to turn to Page 33, and**
11 **there is some language I have marked for you. Could you**
12 **read the first sentence?**

13 **A Yes. I'm reading from Page 33 of this order,**
14 **and I quote, "The statutory term any open issues makes**
15 **clear that the right to arbitrate is as broad as the**
16 **freedom to agree. Any issue on which a party**
17 **unsuccessfully seeks agreement may be submitted to**
18 **arbitration," end quote.**

19 **Q And I have also marked some language down**
20 **beginning at the bottom of the page, could you read that?**

21 **A Certainly. Beginning at the bottom of Page 33,**
22 **and I quote, "When the Florida Commission chose to act as**
23 **the arbitrator in this matter, its obligation was to**
24 **resolve each issue set forth in the position and the**
25 **response, if any. MCI's request for a compensation**

1 provision was such an issue. This was therefore an issue
2 the Florida Commission was obligated to resolve," end
3 quote.

4 Q Okay. Now, our request for changes to the
5 change control process is in this arbitration by petition,
6 isn't it?

7 A Yes.

8 Q Okay. So this order would seem to indicate that
9 the Commission is obligated to make a decision, isn't it?

10 MR. LACKEY: Mr. Chairman, I'm sorry to
11 interrupt, but let me interpose an objection. The order
12 speaks for itself. The last time I looked this order was
13 still on appeal. I mean, you all can make a legal
14 decision about whether you have to take this or not. It
15 is not appropriate to ask this witness to address this.

16 MS. RULE: If I may respond. The witness says
17 the Commission shouldn't be doing it, and I think I am
18 entitled to explore the basis for the witness' opinion,
19 whether he is aware of this decision and whether he took
20 it into account.

21 MR. LACKEY: It is his personal opinion and he
22 is entitled, if I may, Mr. Chairman, to express it, and I
23 think he told why. He didn't say he was basing it on this
24 opinion or not on this opinion.

25 CHAIRMAN JACOBS: Okay. He can take the order

1 to say what it says. I would ask that he should not form
2 a legal opinion as to its interpretation. And if he wants
3 to form his own opinion and he chooses to base it on this
4 decision, then I think you can pursue a line of rationale
5 on this decision itself. But other than that he probably
6 shouldn't form a legal opinion, he shouldn't legally
7 interpret this decision.

8 MS. RULE: Well, let me ask a different
9 question, then.

10 BY MS. RULE:

11 Q Mr. Pate, when you formed your opinion that you
12 thought it was inappropriate for the Commission to review
13 this issue in arbitration, did you have this order in
14 mind, the federal court's order in mind?

15 A No, I did not have this order in mind.

16 Q Thank you. Part of what happens in the change
17 control process is that ALECs occasionally vote on a
18 change control issue, is that correct?

19 A That is correct. It's a prioritization process
20 and a weighted voting methodology that is used.

21 Q Okay. And BellSouth is not bound by the results
22 of that vote, is it?

23 A Help me understand your question when you say
24 bound.

25 Q Let me rephrase it for you. If the ALECs

1 unanimously vote in favor of a proposition, there is
2 nothing in the change control document that obligates
3 BellSouth to go along with that, is there?

4 **A** I don't recall any terminology that obligates
5 them to go along from the standpoint of here is the
6 prioritization using a weighting voting methodology and,
7 therefore, Item Number 1, you do Number 1 and you don't do
8 anything else until Item Number 1 is done. If that is
9 what you mean by obligated and bound no, that is not the
10 intent. The intent is to make sure we have the ALECs'
11 interest, their input so that we can take that and take a
12 look at everything that has to be done as well as
13 regulatory changes and such, and then figure out as we are
14 managing our releases the best approach from the business
15 standpoint to utilize.

16 **Q** Well, in fact, BellSouth can veto any CLEC vote,
17 can't it?

18 **A** Well, you know, I hear this term veto come up
19 and I don't see the term veto in the document. So if I'm
20 missing that, tell me. What BellSouth can do, it has some
21 very defined criteria that says they can reject that
22 change request, and that is stipulated in the document.
23 But from a veto standpoint, it is a rejection of that
24 request, and part of the stipulation of that document also
25 is to explain why that is rejected and if the CLECs

1 desires, even bring the subject matter experts to the
2 meeting and explain.

3 Q Well, didn't BellSouth recently veto a CLEC
4 vote?

5 A You will have to refresh me with what you are
6 referring to.

7 Q I would like to hand you a document that is
8 entitled BellSouth change control process document,
9 consensus voting ballot. Have you seen this before?

10 A Yes, I have.

11 Q Okay. And it lists a number of different items
12 that CLECs were called upon to vote on, right?

13 A I think 34, specifically.

14 Q Okay. And over on the right-hand column there
15 are little boxes where somebody could check agree,
16 generally disagree, neutral, somewhat disagree, and
17 disagree, right?

18 A That is correct.

19 Q And you heard Mr. Bradbury testify about how a
20 consensus is determined -- well, why don't you tell me how
21 a consensus is determined under this process?

22 A Well, under this process -- and, first, I think
23 before we get to that we need to understand what the
24 process is. This is a balloting process that was utilized
25 to get ALEC interest -- not interest, but ALECs' decision

1 on changes being proposed to the change control process
2 document itself. In my summary I referred to the Version
3 2.1, which is the current version of that document. This
4 was as a result of a subcommittee out of the change
5 control process to go and take a look at the ALECs'
6 interest and try to improve the language and the processes
7 for clarity purposes. These are 34 items that were
8 identified in this balloting process to get their vote on
9 that. So based on that process that is defined, and I
10 don't even think that process has really been clearly
11 developed in the CCP document itself, but it was agreed to
12 use this to get the interest -- not the interest, I keep
13 saying that -- but to get the input from the ALECs, that
14 is what is this document represents.

15 Now, to answer your question, if I heard your
16 question correct was what does consensus mean from this
17 document. And we have -- if we look at Item Number 1 on
18 the very first page, it says -- you see that darkened
19 area, Item Number 1 meeting consensus. And this is where
20 BellSouth agreed with the CLECs' participating in this
21 process, that we would accept this language if that is
22 what in case they wanted to do. We had reached consensus
23 on that through working through the process team.

24 There are, I think, seven items in here, if my
25 numbers are correct, that say they are contested. In that

1 case through this process working with the process
2 improvement team, we have said give us your input, but
3 based on what you are asking for at this time point in
4 time BellSouth cannot support doing that.

5 Q Well, what are some reasons BellSouth might give
6 for not supporting a CLEC consensus?

7 A Well, we think we would need to go look at the
8 specific ones.

9 Q Well, I believe you testified about some
10 circumstances under which BellSouth might not implement a
11 CLEC request. I can't point you to a page in your
12 testimony.

13 A Well, I will describe in general terms why not.

14 Q That's fine.

15 A I know it is in my testimony, but I couldn't go
16 directly to a page, as well. But BellSouth would not be
17 able to support some of these if it is not within the
18 capability of processes to do it, that would be one
19 reason. Or there is another reason, if it is just not
20 reasonable to do it. For whatever reason we decide it is
21 not prudent from our practices, we don't think it is
22 reasonable to do, we can't support it from that
23 standpoint.

24 Q Okay. And if the CLECs reach a consensus and
25 BellSouth disagrees and says, no, we can't support that,

1 what happens to that contested issue?

2 A Well, two things happen, really. The first is a
3 communication back to why we can't support. We owe that
4 explanation back to the individual ALEC or ALECs who have
5 submitted it. And as a result of that, there is a process
6 that is well-defined in the document, an escalation
7 process that they could go back and escalate internally
8 for an internal review all the way up to senior management
9 within BellSouth. And then it has one step further in
10 that, a dispute process where if it can't be resolved
11 there for them to take it and form some type of formal
12 complaint to a Commission.

13 So, the process is well-defined from that
14 standpoint that we are going to take to you what our
15 position is why we can't do it from a capability
16 standpoint or a reasonable standpoint, and if you
17 disagree, the escalation and dispute process is an
18 alternative for you.

19 Q Well, let's look at one of the items in this
20 document that you have. Let's look at Item Number 34.
21 It's on Page 14. Now, that says contested consensus. And
22 I think I gleaned from your statements earlier a contested
23 consensus means the CLECs agree, but BellSouth contests
24 that, is that correct?

25 A Yes.

1 **Q** **Okay. And this item was put out for a vote,**
2 **wasn't it?**

3 **A** **Yes.**

4 **Q** **Okay. And I have looked this over, and it**
5 **appears to me that the operative difference is -- let's**
6 **say one important difference is in the second bullet**
7 **point. Could you read the second bullet point under the**
8 **CLEC recommendation?**

9 **A** **Under the CLEC recommendation, the second bullet**
10 **point reads, and I quote, "Without necessity for prior**
11 **mediation, either BellSouth or any CLEC affected by this**
12 **dispute may file a formal complaint with the appropriate**
13 **state and regulatory agency requesting resolution of the**
14 **issue," end quote.**

15 **Q** **Take a look at the BellSouth recommendation.**
16 **Can you tell me how that differs from the CLEC**
17 **recommendation?**

18 **A** **Well, I don't see a difference in that**
19 **particular item you had me read.**

20 **Q** **I'm sorry, I should have pointed you to the**
21 **first bullet point under the BellSouth recommendation, and**
22 **I apologize. Actually, I should have pointed you to the**
23 **first bullet point under the CLEC recommendation, too, it**
24 **turns out.**

25 **A** **Let me point out the difference. In the CLEC**

1 recommendation, there is a sentence that is not at the end
2 of that first bullet that appears in BellSouth's. And the
3 sentence reads, "If the medication results in the
4 resolution of dispute --" excuse me, let me start over.
5 "If the mediation results in the resolution of the
6 dispute, that resolution shall apply to all CLECs affected
7 by the dispute." That language does not appear in the
8 CLEC recommendation.

9 Q Okay. Now, when this item was voted upon, the
10 CLECs were unanimous in consensus in favor of the CLEC
11 recommendation, weren't they?

12 A By their input, yes.

13 Q And nobody except BellSouth voted for the
14 BellSouth recommendation, right?

15 A That is correct. But let me point out to you
16 the number of CLECs we were getting this input from is
17 nine. Nine CLECs, because they are the only ones -- even
18 though it was disseminated to all those that are
19 registered participants, only nine chose to take the time
20 to give input back, and those nine voted for the CLEC
21 language.

22 Q And how much CLECs received the ballot?

23 A I think it was sent out to all the registered
24 members, and as I quoted in my summary there is
25 approximately 100.

1 **Q** **Okay. So of those voting, a consensus, a**
2 **unanimous consensus was in favor of the CLEC**
3 **recommendation, right?**

4 **A** **That is correct.**

5 **Q** **And any one of those 100-plus CLECs could have**
6 **voted in favor of the BellSouth recommendation and chose**
7 **not to, apparently.**

8 **A** **If they had chosen to take the time and the**
9 **interest, they could have voted.**

10 **Q** **Okay. But none of those who took the time and**
11 **interest voted in favor of BellSouth's position, did they?**

12 **A** **That is correct.**

13 **Q** **Okay. Which position ended up in Version 2.1 of**
14 **the change control document?**

15 **A** **I didn't bounce it back to see if we changed**
16 **anything at all in that. You will to tell me if you have**
17 **done that level of study.**

18 **MS. RULE: We'll hand that out. And I think I**
19 **skipped an exhibit. The last one, the consensus voting**
20 **ballot I would like identified as Exhibit 28. And this**
21 **document --**

22 **CHAIRMAN JACOBS: Well, I think we agreed that**
23 **you could just refer to that because it was under the --**

24 **MS. RULE: That was the order. I skipped one**
25 **after that. The consensus voting ballot.**

1 **CHAIRMAN JACOBS: That's right.**

2 **MS. RULE: I would like that identified as 28.**

3 **CHAIRMAN JACOBS: We will mark this as Exhibit**
4 **28, right.**

5 **MS. RULE: And this document, which is Version**
6 **2.1 of the change control process, I guess would be 29.**

7 **CHAIRMAN JACOBS: Show those marked.**

8 **(Exhibits 28 and 29 marked for identification.)**

9 **BY MS. RULE:**

10 **Q Mr. Pate, could you take a look on Page 48 of**
11 **the document?**

12 **A Yes, I'm there. I have already looked at it.**

13 **Q Pardon me?**

14 **A I'm there. I have already looked at it.**

15 **Q Which version is in here, the CLEC version that**
16 **was unanimous or the BellSouth version?**

17 **A They incorporated the BellSouth version, and if**
18 **you look at that, what I think happened, I would have to**
19 **verify each one, is each one of the contested BellSouth**
20 **versions was what we incorporated in this document at this**
21 **point in time as part of the balloting process. And let**
22 **me add to and get you to understand that this is a living**
23 **document and this process is still underway. And that is**
24 **what was done at this point.**

25 **I don't know if that was agreed to in advance or**

1 how that was constructed, but we incorporated other areas
2 as well, of which some of them was improvements,
3 particularly some of the cycle times, improvements over
4 the last document version even though they were still
5 contested. So to answer your question, we put the
6 language in from the BellSouth proposed language.

7 Q So, even though nobody voted in favor of that
8 language and, in fact, everybody who voted voted against
9 it, BellSouth vetoed the CLEC consensus and put its own
10 desired language in Version 2.1, right?

11 A For those items, yes.

12 Q Okay. In fact, for all the seven contested
13 items, right?

14 A Yes, that's what I said.

15 Q Okay. So, if I understand you correctly, you
16 are saying no need to worry, this is a living document,
17 there is still time to change it. But didn't the parties
18 just go through the change process and BellSouth said, no,
19 we don't agree, we are using our own language?

20 A We don't agree with the proposed language. I
21 don't know that BellSouth has shut the door saying there
22 is still not room to talk and try to get this language to
23 an agreement point. But based on the language that the
24 CLEC community had developed, or the ALEC community, we
25 said we cannot support that, and this is our language.

1 **Q** **Okay. Now, BellSouth only agreed to this vote**
2 **in the first place on the condition that they could veto**
3 **the results, isn't that correct?**

4 **A** **Under the condition that we would mark those**
5 **contested consensus and from that standpoint where we**
6 **couldn't support it, not incorporate the language we**
7 **couldn't support.**

8 **Q** **Let's me hand you another document.**

9 **MS. RULE: I would like this identified as --**
10 **where are we -- Number 30.**

11 **CHAIRMAN JACOBS: It will be marked as Exhibit**
12 **30, entitled the change control process meeting minutes, I**
13 **assume.**

14 **(Exhibit 30 marked for identification.)**

15 **MS. RULE: Thank you.**

16 **BY MS. RULE:**

17 **Q** **Mr. Pate, I would like you to turn to Page 2,**
18 **and there is a grid with six boxes in it. Could you look**
19 **at the one on the right-hand side, the second box. And it**
20 **looks like there is a second paragraph. Could you read**
21 **that one?**

22 **A** **I'm reading the second paragraph --**

23 **Q** **Starting BellSouth?**

24 **A** **-- and I quote, "BellSouth agreed to the E-mail**
25 **ballot as long as BellSouth has the right to veto a change**

1 that could not be supported as proposed. There were no
2 objections."

3 Q Now, what does it mean when there are no
4 objections? Was this item being voted on, whether
5 BellSouth could veto?

6 A I wasn't present. I cannot speak to how that
7 terminology was used in the incorporation of these
8 minutes.

9 Q Well, in fact, AT&T objected to that language
10 and did not agree to it, is that correct?

11 A I'm not sure, I don't know.

12 MS. RULE: I would like to hand you another
13 document that I would like identified as Number 31.

14 CHAIRMAN JACOBS: It's identified as Exhibit 31.
15 Let's see, these are the meeting minutes of 1/10, and I
16 should have -- the prior one is noted as 1/10/01 meeting
17 minutes, as well.

18 MS. RULE: Mr. Chairman, this one is an E-mail
19 dated February 11th, and that will help distinguish it,
20 and it has got a cover sheet on it to that effect.

21 (Exhibit 31 marked for identification.)

22 BY MS. RULE:

23 Q Okay. Now, the first page of this exhibit is a
24 cover sheet. There is a whole long list of addressees on
25 the E-mail on that second page. What is this list of

1 addressees?

2 **A** **I know I'm one of them. I have seen this**
3 **E-mail, by the way, but I think some of the these others**
4 **are individuals that participate within the change control**
5 **process, this particular process improvement team. And**
6 **there may be individuals within BellSouth copied on here**
7 **that aren't direct participants, but that is what I**
8 **believe it is.**

9 **Q** **Okay. And turning to the third page, which is**
10 **numbered as Number 2, do you see a paragraph there about**
11 **halfway down the page that is numbered two?**

12 **MR. LACKEY: I need to object to this, Mr.**
13 **Chairman. The BellSouth lawyers may not know how to lay a**
14 **foundation or get a document in, but I know this is a**
15 **document that purports to be written by one of AT&T's**
16 **witnesses. And there is no way that she can get this in**
17 **or cross-examine this witness, you know, using Mr.**
18 **Bradbury's E-mail.**

19 **CHAIRMAN JACOBS: Ms. Rule.**

20 **MS. RULE: Well, let me give it a shot.**

21 **BY MS. RULE:**

22 **Q** **Mr. Pate, did you receive this E-mail?**

23 **A** **Yes.**

24 **Q** **Are you aware that Mr. Bradbury objected to the**
25 **language in the meeting minutes saying that BellSouth**

1 could veto any provision the CLECs voted on?

2 A I am aware of his statement here. I did not
3 relate it back to the specific meeting minutes when I read
4 it, but, yes.

5 Q The E-mail relates back to the meeting minutes
6 by its terms, doesn't it?

7 A That's right. When I say I didn't relate this,
8 as a lot of us do, I mean, I get a lot each day and I read
9 a lot fast, and I didn't slow down long enough to relate
10 it to -- or pull these specific meeting minutes or read
11 these meeting minutes.

12 CHAIRMAN JACOBS: I will allow it, obviously.

13 MR. LACKEY: It doesn't change my objection. I
14 mean, he knows -- obviously he knows from some source that
15 Mr. Bradbury objected to something, but that doesn't make
16 this document legitimate, meaningful, accurate, or
17 anything else.

18 CHAIRMAN JACOBS: I will allow the questioning,
19 and then we will entertain your objection on the exhibit.

20 MS. RULE: Mr. Chairman, I don't think it is
21 highly necessary. I think the only point I wanted to make
22 was that AT&T objected and BellSouth and Mr. Pate were
23 aware of those objections, and, therefore, the statement
24 in the meeting minutes that BellSouth could veto it and
25 there would be no objections, there were objections.

1 That's it. We don't need to get the document in and I
2 will withdraw it.

3 CHAIRMAN JACOBS: Okay.

4 BY MS. RULE:

5 Q Moving on to maintenance and repair, Mr. Pate.
6 In its 1998 order that rejected BellSouth's second
7 Louisiana 271 application, the FCC said that TAFI does not
8 provide nondiscriminatory access to maintenance and repair
9 because it can't be used for all types of services, right?

10 A I don't have it in front of me, but it said
11 something to that extent. I will accept that subject to
12 check.

13 Q Okay. And the FCC also said that ECTA doesn't
14 provide parity, either, right?

15 A It said something. I don't recall the
16 specifics, but, yes, it said something.

17 Q Okay. So the last time the -- was this the last
18 time the FCC specifically examined BellSouth's maintenance
19 and repair systems --

20 A It's the last time --

21 Q -- an open docket?

22 A I'm sorry. Yes, it is, because that is the last
23 time we submitted an application. But since that
24 application we have discussed this particular issue with
25 the FCC, more particularly FCC staff members for clarity,

1 but there has not been a formal application since that
2 point in time.

3 Q And the FCC hasn't issued any later orders after
4 those discussions?

5 A On behalf of BellSouth, that is a correct
6 statement.

7 Q And those discussions were with the FCC staff?

8 A Yes.

9 Q And the Staff doesn't speak for the FCC, does
10 it?

11 A No more than this staff speaks for the
12 Commission. They offer guidance and input.

13 Q So in the last formal review of BellSouth's
14 maintenance and repair systems made by the FCC, the FCC
15 declared that they were not nondiscriminatory, correct?

16 A That is correct.

17 MS. RULE: No further questions.

18 CHAIRMAN JACOBS: Staff.

19 MR. FORDHAM: Just a few, Mr. Chairman.

20 CROSS-EXAMINATION

21 BY MR. FORDHAM:

22 Q Mr. Pate, in these proceedings we have had
23 testimony regarding three entities known as the change
24 review board, the senior board of directors, and the
25 triage group, which to one extent or another impact, if

1 not have full authority over ALEC orders. Could you tell
2 us, please, whether the ALECs can present their own change
3 requests directly to these groups?

4 A The process is not defined if they submit them
5 directly to the groups. However, they had the opportunity
6 to interact with the person, the individual that I would
7 refer to as the subject matter expert from that change
8 review board. Where I state earlier there is a process,
9 there is an area in there where if we reject -- BellSouth
10 rejects a change request, that we have to go back and
11 explain why that was rejected. As well as at the request
12 of the ALEC that subject matter expert would come and
13 present. That subject matter expert is going to either be
14 on that triage or that change review board. So from that
15 standpoint they have access to the person, but it's not a
16 part or process of that formal meeting of that group.

17 Q And is there a particular reason why it would
18 not be, you know, cut out the middleman and let them go
19 direct to the group?

20 A Well, I think, frankly, it is more efficient as
21 it is described right now. This is a gathering of
22 BellSouth's subject matter experts who are managing many
23 different things. So they have four meetings where they
24 come together, talk about the systems, the systems
25 interaction associated with whatever the request is. I

1 think it is more appropriate for them to stay focused on
2 that task rather than have that task also, shall I say,
3 impacted by someone external to the organization trying to
4 express their viewpoints. That's what the process of
5 change control is about. They have still the ability, the
6 ALEC, to give that input. And, once again, to chat with
7 them if we reject it.

8 Q Okay. Mr. Pate, if BellSouth has validated a
9 defect in one of its interfaces, I assume that means it is
10 not operating as it is supposed to, is that essentially
11 correct?

12 A Yes. And that is based on the defect definition
13 that has three severity levels, but your answer is yes.

14 Q And then there is a label that can be put on
15 that validated defect known as high impact. Is that a
16 term that we agree is appropriate?

17 A There is three levels; high impact is the
18 highest severity, there is a medium and there is a low.

19 Q And what does high impact mean as it relates to
20 an ALEC change request?

21 A Well, to ensure I don't misstate it, I would
22 rather go right to the process, and I think I can quickly
23 find it there for you. I'm reading from the 2.1 version
24 that I think has been distributed, on Page 33, and as it
25 relates to defect it defines high impact, "The failure

1 causes impairment of critical system functions and no
2 electronic work-around solution exists."

3 Q So that could mean in some instances that an
4 ALEC is unable to process a customer order which could
5 leave the ALEC customer wondering where is the service you
6 promised, is that essentially correct?

7 A Well, no, that's not quite correct, but it's
8 close. What that means is there is no electronic way to
9 process the order. But they still can get the order
10 manually submitted and processed to serve the end user
11 customer.

12 Q In the 2.1 version which you were just quoting
13 from, I think Page 37, it indicates that an ALEC may have
14 to wait up to 25 days for correction of a validated
15 defect, which even if it is classified to have high impact
16 on the company. Do you -- in your opinion, would you
17 consider that a rather serious impediment to an ALEC's
18 ability to do business?

19 A I would consider it an impairment if it took the
20 25 days, but let's be clear what this says. This says
21 implemented within 4 to 25 business days. So 25, we are
22 projecting that is the outset case, and we are definitely
23 going to be doing our best effort to get this fixed as
24 quickly as possible.

25 Q Yes. I didn't mean to mislead you, I think I

1 said up to 25 days.

2 A Right. I heard you correctly, I just wanted to
3 make sure everyone else who may not have the document in
4 front of them understood that is on the outset case.

5 Q Mr. Pate, are you aware – I know you have been
6 tied up here at this hearing, are you aware that the
7 group, the entity we referred to earlier known as the
8 triage group has been abolished?

9 A No, I'm not aware that the triage group has been
10 abolished.

11 Q Apparently, our staff was advised of that today.
12 And so you have no knowledge of it having been abolished?

13 A No, I do not. And I would be interested in
14 hearing who advised you of that, because it was probably
15 the same person that helped me respond to what the triage
16 really was and what it's about. So I'm not aware of it
17 being abolished.

18 MR. FORDHAM: So I suppose any questions I ask
19 you about the results of the abolition would be
20 speculative on your part. And consequently I will just
21 say I have no further questions.

22 THE WITNESS: Thank you.

23 MR. FORDHAM: Thank you, Mr. Pate.

24 COMMISSIONER PALECKI: I just have one question
25 I would like to ask. What would be entailed for BellSouth

1 to give AT&T the ability to access the full functionality
2 of TAFI and WFA?

3 THE WITNESS: The full functionality of TAFI and
4 ECTA -- I think you said WFA, but did you mean ECTA? Did
5 I mishear you, I'm sorry?

6 COMMISSIONER PALECKI: Well, the prehearing
7 order uses the term WFA, but let's talk about TAFI.

8 THE WITNESS: First, let me give you a little
9 bit of description of TAFI and what TAFI is. TAFI is an
10 expert presentation system that was developed to replace
11 the human screening function that we used to do many years
12 ago associated with trouble tickets. It is designed to
13 use a diagnostic approach based on the user interacting
14 with the customer, asking them a series of questions. It
15 will take that data and go and query and gather data from
16 various systems within BellSouth databases and
17 applications and come back with some results or even ask
18 additional questions.

19 What that process is doing throughout that, it
20 is screening the trouble report that is being reported by
21 the end user. And based on that screening it is
22 initiating some actions through LMOS to various systems,
23 LMOS, L-M-O-S, to then do one of three things with that
24 trouble report. Either get it resolved itself through
25 appropriate action, get it directed to another area

1 because it is only designed to do nondesigned POTS type
2 services, or close it out if it was inappropriate
3 altogether, which sometimes happens. It could have been a
4 customer not knowing how to use a particular feature on
5 their system. TAFI, as a result of that process, is a
6 front end to LMOS which is truly the trouble reporting
7 system.

8 Now, you mentioned Wafa. Wafa is the equivalent
9 to LMOS for handling designed services. TAFI does not
10 access Wafa. It cannot. It only functions on nondesigned
11 service. So if an end user customer has a trouble on a
12 designed service, one of the more complex products, that
13 trouble report is directly inputted into Wafa itself.

14 Now, based on that foundation, Commissioner,
15 what question would you have so I can better explain?

16 COMMISSIONER PALECKI: Well, in your position on
17 Issue 32, you state that you have provided AT&T with
18 complete and nondiscriminatory access to TAFI. And it is
19 my understanding that under the interface, I don't know if
20 it is software, hardware, or what the difficulty is, but
21 apparently AT&T is not able to access the full
22 functionality of TAFI as it now stands. And your response
23 is that you are under no requirement to either rewrite
24 ECTA or to include all of the functionality of TAFI, to
25 include all the functionality of TAFI, or to create an

1 entirely new application with that functionality. And I
2 think that's what I'm trying to understand. What are you
3 talking about?

4 **THE WITNESS:** Let me see if I can elaborate for
5 clarity purposes. I don't think there is a dispute
6 between us and AT&T that they can access TAFI and that
7 they have the full functionality that TAFI provides. And
8 that is the exact same TAFI functionality that we use
9 internally for our retail units. I don't think there is
10 any dispute there.

11 We also have another system called ECTA,
12 electronic communications trouble administration. That
13 system is a standards-based system that has been developed
14 to serve the ILEC community. What that system allows an
15 ALEC to do is to submit trouble reports both for design
16 and nondesign services.

17 As you compare that to TAFI, though, it does not
18 do what I described earlier, that screening. It does not
19 have that intelligence to do that screening functionality
20 and to resolve that trouble report. Instead, all ECTA
21 allows you to do is submit the report and then a
22 maintenance administrator has to take that report and do
23 access to necessary systems to screen it. That is the
24 functionality that is not available in this standard-based
25 system.

1 **A main distinction between the two, though, is**
2 **in the ECTA it is referred to as a machine-to-machine or**
3 **application-to-application interface. So that allows you**
4 **to submit information and receive that same information**
5 **back from your submission and pull that into your back-end**
6 **systems. That was designed for it from the industry**
7 **approach.**

8 **TAFI, on the other hand, is a man-to-machine**
9 **interface. As I described, it requires interaction.**
10 **There is someone sitting there at the screen as they talk**
11 **to that end user customer asking the questions that TAFI**
12 **is giving them and directing them. As a result of that**
13 **interaction it is doing things, but it does not allow an**
14 **ALEC, like AT&T, to receive any electronic transmission**
15 **back of that result so that the systems can be -- the**
16 **back-end systems can be populated. Instead, it gives them**
17 **the result, but they have to then rekey that information**
18 **if they so desire to keep it in their back-end systems.**

19 **But I will point out to you that is their**
20 **decision to want to have it in their back end systems.**
21 **They could access all the trouble history information just**
22 **like our retail units can from BellSouth's systems. Does**
23 **that help you, Commissioner?**

24 **COMMISSIONER PALECKI: I think it does help me.**
25 **And I think it kind of brings me up to what my question**

1 is, and that is what would be entailed, what would it
2 entail for BellSouth to provide AT&T with that full
3 functionality that is enjoyed by BellSouth?

4 **THE WITNESS:** Well, first off, let me make sure
5 I state this again. They have the full functionality that
6 is enjoyed by BellSouth today through TAFI. They have
7 exactly the same that we have. There is nothing
8 different. They see the same screens, get the same
9 results. The issue is, once again, their population of
10 their back-end systems. In order to achieve that, a
11 separate system would have to be developed, one that does
12 not exist today that provides that functionality.

13 **A challenge associated with that, Commissioner,**
14 **is the fact that there is not industry standards today**
15 **even to develop that. So, what is being asked is to**
16 **develop a unique application-to-application system at what**
17 **would be a tremendous cost, to be frank here. It would be**
18 **millions of dollars to develop that, where the fact of the**
19 **matter is we give them what we have today in addition to**
20 **we give them a system that follows industry standards**
21 **today.**

22 **COMMISSIONER PALECKI:** I think that answers my
23 question. So you are telling me that it would require a
24 brand new separate system that would entail millions of
25 dollars to develop?

1 **THE WITNESS:** Millions of dollars and months of
2 development time.

3 **COMMISSIONER PALECKI:** Is that something that
4 could be developed by AT&T and handed to BellSouth, or is
5 it -- would it require proprietary information that only
6 BellSouth has available to it?

7 **THE WITNESS:** Well, since it is interactive with
8 our system, BellSouth is going to have to have a part of
9 that development. But I can tell you an organization like
10 AT&T has the IT expertise to do it, but there would have
11 to be some cooperative effort there.

12 **COMMISSIONER PALECKI:** If AT&T was willing to
13 pay the millions of dollars necessary to develop the
14 system, would BellSouth be willing to cooperate and work
15 with them towards that end?

16 **THE WITNESS:** It's beyond cooperation, we will
17 do it. We have said that. And that has out there from
18 day one. And we have requested what we call a bona fide
19 request so that we can define the requirements. And if
20 they are willing to pay for it, we are willing to do it.
21 I mean, it is technically possible to do it.

22 **COMMISSIONER PALECKI:** Thank you.

23 **CHAIRMAN JACOBS:** Redirect.

24 **MR. LACKEY:** Just a couple of points, if I
25 might.

1 REDIRECT EXAMINATION**2 BY MR. LACKEY:****3 Q I want to go to Mr. Fordham's question about the**
4 4 to 25-day period, do you recall that discussion?**5 A Yes, I do.****6 Q Has BellSouth agreed to a best-efforts clause in**
7 these processes?**8 A Yes, and it even stipulates for this particular**
9 one. It says within a 4 to 25-day business day range,
10 best effort.**11 Q So if a particular defect takes three days, how**
12 long will it take us to fix it?**13 A Three days.****14 Q And if it takes ten days because it is**
15 complicated, how long will it take?**16 A Ten days.****17 Q No one should read that to mean that we would**
18 take the 25 days unnecessarily?**19 A Exactly. I mean, it's not our intent to take**
20 that unnecessarily. We want to expedite these. We
21 understand impact. It is truly a defect and we are going
22 to put our resources to it to turn it around as quickly as
23 possible.**24 Q Do you still have Exhibit 28 there?****25 A I'm sorry, I didn't hear you.**

1 Q Do you still have Exhibit 28 there?

2 A Which one was Exhibit 28? I didn't keep up with
3 the exhibit numbers.

4 CHAIRMAN JACOBS: That is the consensus voting
5 ballot.

6 BY MR. LACKEY:

7 Q It's the ballot.

8 A The ballot?

9 Q Yes. I want to go back and talk about Issue or
10 Item Number 34, again.

11 A I'm there.

12 Q Now, if I understand correctly, this was one of
13 the contested items that was submitted to vote, is that
14 correct?

15 A That is correct.

16 Q And there were two alternatives, the CLEC
17 recommendation and the BellSouth recommendation?

18 A That is correct.

19 Q And this issue has to do with dispute
20 resolutions, is that correct?

21 A That is correct, Section 8.

22 Q Now, if I look at the CLEC recommendation, and,
23 again, we are just focusing on the bullet points here,
24 they had a third bullet point on their recommendation,
25 correct?

1 **A** **Yes, they do.**

2 **Q** **And what did they want in their third bullet?**

3 **A** **I will just read it, and I quote, "All**
4 **participants in the CCP shall be provided timely notice of**
5 **any mediation or formal complaints."**

6 **Q** **Okay. So what they wanted to have was**
7 **notification if there was a ruckus among the participating**
8 **ALECs and CLECs and BellSouth, is that correct?**

9 **A** **A ruckus to the point there was a mediation or**
10 **formal complaint filed.**

11 **Q** **Now, the sentence that BellSouth wanted to add**
12 **in its section was -- and let me see if I read this right.**
13 **"If the mediation results in the resolution of the**
14 **dispute, that resolution shall apply to all CLECs affected**
15 **by the dispute," is that right?**

16 **A** **That is correct.**

17 **Q** **So by voting that down, were the CLECs who voted**
18 **saying that they wanted to be notified of a resolution or**
19 **wanted to be notified of a mediation, but they didn't want**
20 **to be bound by the outcome?**

21 **A** **That is my understanding. They were asking for**
22 **notification without being bound by the results of that.**

23 **Q** **Which means if there were eight of them that had**
24 **the same dispute, they could mediate it with us eight**
25 **different times?**

1 **A** I guess it could be interpreted that way.

2 **Q** Okay. Now, even though that was rejected, there
3 is still a dispute resolution and escalation process in
4 the CCP, isn't it?

5 **A** Oh, most definitely. I mean, that is well
6 documented, as I stated earlier.

7 **Q** And if that group of eight or nine CLECs that
8 voted in favor of this thought they could convince any
9 state commission that that was a reasonable position to
10 take, they could bring that to the Commission, couldn't
11 they?

12 **A** Yes, they could. That is the whole purpose of
13 putting that process in there.

14 **Q** All right. So BellSouth's exclusion of this
15 language certainly isn't the final word on it, is it?

16 **A** And I said that earlier. That's why the dispute
17 process is there.

18 **MR. LACKEY:** That's all I have, Mr. Chairman.
19 Thank you. I need to move Exhibit 24.

20 **CHAIRMAN JACOBS:** Without objection, show that
21 Exhibit 24 is admitted.

22 **MS. RULE:** AT&T would move Exhibits 25 through
23 30.

24 **CHAIRMAN JACOBS:** Without objection, show
25 Exhibits 25 through 30 are admitted.

1 (Exhibits 24 through 30 admitted into the
2 record.)

3 CHAIRMAN JACOBS: Thank you. You are excused,
4 Mr. Pate.

5 Is there anything else to come before us, staff?

6 MR. FORDHAM: Not by staff.

7 CHAIRMAN JACOBS: Okay. Why don't we cover the
8 post-hearing procedures then.

9 MR. FORDHAM: The briefs are due on March 14th;
10 the staff rec on May 3rd; and it would be on the May 15
11 agenda.

12 CHAIRMAN JACOBS: Very well. Anything else from
13 the parties? Thank you. We made it.

14 This hearing is adjourned.

15 (The hearing concluded at 6:23 p.m.)

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STATE OF FLORIDA)

: CERTIFICATE OF REPORTER

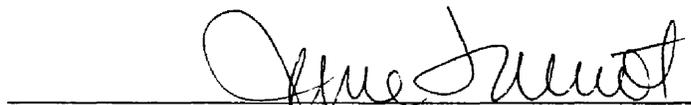
COUNTY OF LEON)

**I, JANE FAUROT, RPR, Chief, FPSC Bureau of Reporting
FPSC Commission Reporter, do hereby certify that the
Hearing in Docket No. 000731-TP was heard by the Florida
Public Service Commission at the time and place herein stated.**

**IT IS FURTHER CERTIFIED that I stenographically
reported the said proceedings; that the same has been
transcribed under my direct supervision; and that this
transcript, consisting of 199 pages, Volume 9 constitutes a
true transcription of my notes of said proceedings and the
insertion of the prescribed prefiled testimony of the
witnesses.**

**I FURTHER CERTIFY that I am not a relative, employee,
attorney or counsel of any of the parties, nor am I a relative
or employee of any of the parties' attorney or counsel
connected with the action, nor am I financially interested in
the action.**

DATED THIS 27TH DAY OF FEBRUARY, 2001.



**JANE FAUROT, RPR
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Chief, Bureau of Reporting
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