BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY OF

JUDY WHEELER

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.,
AT&T BROADBAND PHONE OF FLORIDA, LLC,
AND TCG SOUTH FLORIDA, INC.

DOCKET NO. 960786-TL

JULY 20, 2001

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Q. PLEASE STATE YOUR NAME, ADDRESS AND EMPLOYMENT.

A. My name is Judy Wheeler. My business address is 5934 Richard Street, Jacksonville, Florida. I am employed as Manager of Regional Provisioning & Repair for Telephony by AT&T Broadband Phone of Florida LLC ("AT&T Broadband"). My responsibilities at AT&T Broadband include provisioning of local telephone service and third party processing for the state of Florida, which involves customer service requests where a party other than the customer and AT&T Broadband must participate, including the handling of electronic local service requests ("LSRs") for number ports, E911 records, directory listings and caller name display ("CNAM") records. The Regional Provisioning & Repair operation in Jacksonville is AT&T Broadband's primary point of contact with BellSouth Telecommunications, Inc. ("BellSouth"), to establish service for new AT&T Broadband telephone service customers.

Q. PLEASE DESCRIBE YOUR BACKGROUND AND PROFESSIONAL EXPERIENCE AS THEY RELATE TO THE ISSUES IN THIS PROCEEDING.

A. I have worked in the telephony industry for 32 years. My career began in 1969 at BellSouth, where I worked for approximately 26 years. My jobs at BellSouth ranged from clerk to outside plant designer to supervisor of a $35 million budget for outside plant operations. Although I left BellSouth in 1995, I performed contract engineering work for BellSouth for about a year. In 1998, I became employed by MediaOne Florida Telecommunications, Inc., as Operations Manager, handling the formation of the telephony service center for Jacksonville. In 1999, because of my skills and experience, I was asked by MediaOne to set up the regional call center for telephony, which handled inbound customer calls regarding changes to existing service, billing questions and repair for Florida, Richmond, Virginia, and Minneapolis-St. Paul, Minnesota. In December 2000, I began my current work as Manager of Regional Provisioning & Repair for Telephony for AT&T Broadband, which serves Jacksonville, South Florida and Richmond, Virginia.

Q. HAVE YOU TESTIFIED IN OTHER REGULATORY PROCEEDINGS IN THE PAST?

A. No.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to demonstrate that BellSouth has not provided alternative local exchange carriers ("ALECs") with nondiscriminatory access to certain elements necessary for AT&T Broadband to provide service to new customers. I am testifying about BellSouth activities which have impeded AT&T Broadband's attempts to acquire new customers and properly process customer requests. Specifically, my testimony addresses:

(i) BellSouth's failure to properly process customer service requests, such as requests to switch to AT&T Broadband service and modifications to directory listings;

(ii) BellSouth's erroneous rejection of and unnecessary delays in processing customer requests received by BellSouth from AT&T Broadband;

(iii) BellSouth's failure to adequately assist AT&T Broadband with issues that arise, often due to BellSouth problems, when AT&T Broadband acquires a BellSouth customer.

These deficiencies have placed AT&T Broadband at a significant competitive disadvantage to BellSouth. Customers who have selected AT&T Broadband as their local carrier have endured unreasonable delays and other inconveniences that have not been imposed on BellSouth customers. As such, BellSouth has not given competitive carriers a meaningful opportunity to compete in the residential market.

Q. WHERE DOES AT&T BROADBAND PROVIDE TELEPHONE SERVICE IN FLORIDA?

A. AT&T Broadband provides telephony service in the South Florida and Jacksonville markets to residential customers.

Q. WHY MUST AT&T BROADBAND RELY ON BELLSOUTH TO PROVIDE SERVICE TO AT&T BROADBAND CUSTOMERS?

A. If a BellSouth customer desires to switch service to AT&T Broadband but wishes to retain an existing telephone number, then AT&T Broadband must work with BellSouth to move or "port" that customer's service from BellSouth to AT&T Broadband. Also, when AT&T Broadband provides the initial service for a telephone customer, as opposed to switching over an existing BellSouth customer, BellSouth still must process these AT&T Broadband customer requests for directory listing, which must be submitted to and approved by BellSouth before they can become effective.

Q. DO YOU EVER EXPERIENCE PROBLEMS RELYING ON BELLSOUTH?

A. Yes. As I explain in detail later in my testimony, BellSouth often fails to provide adequate provisioning for new AT&T Broadband customers.

Q. WHY IS BELLSOUTH'S FAILURE TO PROVIDE ADEQUATE PROVISIONING FOR NEW AT&T BROADBAND CUSTOMERS A SIGNIFICANT ISSUE IN THIS PROCEEDING?

A. To obtain authority to provide in-region InterLATA services, BellSouth must prove that it has met the requirements of the competitive checklist in Section 271. Checklist item 2 of Section 271[1] requires BellSouth to provide ALECs with nondiscriminatory access to unbundled network elements. Checklist item 11 requires BellSouth to provide adequate number portability.[2] The systems, databases and personnel that BellSouth uses to process competing carriers' orders for telecommunications services are among the network elements referenced in checklist item 2 and part of the number porting process referenced in checklist item 11.[3] These are Issues 3 and 12, respectively, in the Florida Public Service Commission's April 25, 2001, Order Regarding Issues to Be Addressed at Hearing (Order No. PSC-01-1025-PCO-TL).

Q. WHAT HAPPENS WHEN AT&T BROADBAND ACQUIRES A NEW BELLSOUTH CUSTOMER?

A. I will provide a brief overview of the steps that are required when AT&T Broadband acquires a new customer. Later in my testimony, I provide a detailed description and describe the problems AT&T Broadband has encountered with BellSouth when switching a customer's local service. There are several steps in that process, which are as follows:

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1 47 U.S.C. § 271(c)(2)(B)(ii).

2 47 U.S.C. § 271(c)(2)(B)(xi).

3 *AT&T Corp. v. Iowa Utils. Bd.*, 119 S. Ct. 721 (1999); *Iowa Utils. Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997).

(i) AT&T Broadband uses BellSouth's Local Exchange Navigation System ("LENS") and electronic data interchange ("EDI") systems to submit service requests;

(ii) Once BellSouth receives a request, BellSouth should acknowledge receipt of the order by sending AT&T Broadband a functional acknowledgment ("FA"). Next, BellSouth should either accept the service request if it is error free or send AT&T Broadband a "reject" or "clarification" on the service request;

(iii) If AT&T Broadband receives either a reject or a clarification, AT&T Broadband must either send additional information as requested by the clarification or submit an entirely new order if there has been a reject that cannot be fixed;

(iv) If BellSouth accepts the request, BellSouth will send AT&T Broadband a firm order confirmation ("FOC") indicating that the customer's service order will be completed by the due date and that the directory listing for the customer will be updated;

(v) After the FOC has been issued, BellSouth must notify the Number Portability Administration Center ("NPAC") database to change the number to show that the customer now receives local service from AT&T Broadband, and BellSouth must also disconnect the telephone number from its systems.

If all goes smoothly, which often is not the case, the transition for the customer from BellSouth to AT&T Broadband should be accomplished in a timely and seamless manner.

Q. HAS BELLSOUTH PROCESSED AT&T BROADBAND SERVICE REQUESTS IN A TIMELY MANNER?

A. No. Instead of facilitating these customer requests, BellSouth hinders AT&T Broadband's ability to execute changes of service and other customer requests. Prospective customers must wait an unreasonable amount of time to switch their local telephone service to AT&T Broadband because their installation dates have been delayed as a result of BellSouth's inability to properly process service requests. Because first impressions are lasting impressions, customers experiencing these initial difficulties will reconsider changing local providers. Even BellSouth acknowledges on its website for ALECs that it is critical to ALECs' success that these requests are properly processed: "If requests aren't completed correctly or delivered on time, you run the risk of losing customers." See Exhibit JW-1, p. 1 (BellSouth overview of ALEC training).

Q. YOU MENTIONED THAT AT&T BROADBAND RELIES ON BELLSOUTH TO "PORT" A CUSTOMER'S NUMBER. WHAT IS NUMBER PORTING?

A. Item 11 of the checklist in Section 271 requires BellSouth to provide number portability. The Telecommunications Act defines number portability as the ability of users of telecommunications services to retain, at the same location, existing numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another.[4] To carry out a customer's request to switch telecommunications carriers, AT&T

[4] 47 U.S.C. § 153(30).

Broadband needs BellSouth's cooperation to switch or "port" the customer's number from BellSouth to AT&T Broadband. Unfortunately, BellSouth's process for accommodating customer requests has proved inadequate for this task. As my testimony will show, recurrent problems with BellSouth have hindered and sometimes prevented AT&T Broadband from obtaining and retaining new customers.

Q. HOW DOES AT&T BROADBAND INITIATE THE PORTING PROCESS?

A. To initiate the porting process, AT&T Broadband must first access BellSouth's Local Exchange Navigation System ("LENS"). Using LENS, AT&T Broadband verifies that the information it has obtained from the customer is consistent with the information BellSouth has for that customer. Because AT&T Broadband uses LENS prior to submitting a service request to BellSouth, this should reduce the risk of error, and should expedite the process because BellSouth should not reject orders that use BellSouth's own data. See, e.g., Exhibit JW-2, p.1 (BellSouth overview and stated purpose of LENS). In practice, this does not happen.

Q. WHY ISN'T THE USE OF LENS EXPEDITING THE PORTING PROCESS?

A. AT&T Broadband employees must manually input into customer service requests the information that appears in LENS. Next, the AT&T Broadband employees must visually compare the information they just retyped to the information in BellSouth's LENS. If there is even one character that is

different than the information in LENS, BellSouth will not accept the order. This manual keystroke process is time consuming, costly and increases the risk of inaccuracy.

Conversely, the systems BellSouth uses for its own retail operations have the capability to receive and transmit customer data internally. As a result, BellSouth's systems can electronically populate fields in BellSouth's own retail orders with customer data with little or no manual input. This capability, which saves time and expense and provides a greater level of accuracy, clearly demonstrates that there is a lack of parity between BellSouth's systems and the systems AT&T Broadband must rely upon to create customer service orders. Because BellSouth has this capability for its own retail services, it also must provide the same functionality to ALECs to satisfy its obligation to provide nondiscriminatory access.

Q. AFTER AT&T BROADBAND VISUALLY CONFIRMS THAT THE CUSTOMER SERVICE INFORMATION IS CORRECT, WHAT ARE THE NEXT STEPS IN THE PORTING PROCESS?

A. After AT&T Broadband has confirmed, through a visual inspection of LENS, that its customer information is consistent with BellSouth's, AT&T Broadband submits an electronic local service request ("LSR") to BellSouth listing the due date for service initiation, the number to be ported, the directory listing request, and the name and address of the customer. LSR submissions are made electronically through BellSouth's electronic data interchange ("EDI"). Again, the automated nature of this process should, if

properly executed, result in an efficient processing of the customer order with minimal error.

Q. DO YOU EVER EXPERIENCE DELAYS IN ORDER PROCESSING DUE TO THE UNAVAILABILITY OF BELLSOUTH'S EDI?

A. Yes. If BellSouth's EDI system is unavailable, AT&T Broadband must delay the LSR submissions or resort to manual submissions, which are difficult and slower to process. See Exhibit JW-3, p.2 (describing process in the event of downtime). Also, to the extent errors or breakdowns in the automated LSR submission or processing stages arise, delay will occur and manual intervention may be required, eliminating much of the promised efficiency.

Q. WHAT SHOULD BELLSOUTH DO WHEN IT RECEIVES AN LSR?

A. Assuming BellSouth's system is functioning properly, when BellSouth receives an LSR, it should electronically issue a functional acknowledgment ("FA") to AT&T Broadband, verifying receipt of the LSR. After issuing an FA, BellSouth then should promptly respond electronically to the LSR by: (i) accepting the order by issuing a firm order confirmation ("FOC"), (ii) rejecting the order by issuing a rejection notice, or (iii) requesting clarification of some aspect of the order by issuing a clarification notice. See Exhibit JW-4, at 4 (providing BellSouth diagram of LSR process).

Q. IF BELLSOUTH ACCEPTS THE ORDER AND ISSUES A FIRM ORDER CONFIRMATION (FOC), WHAT IS THE NEXT STEP TO PORT THE CUSTOMER'S TELEPHONE NUMBER?

A. Upon issuance of an FOC, AT&T Broadband notifies the Number Portability Administration Center ("NPAC") database to record that this customer telephone number will become an AT&T Broadband number instead of a BellSouth number on the designated date. After AT&T Broadband has notified NPAC of the number to be ported and the associated due date and routing information, BellSouth may confirm or object to the number port. If BellSouth does not raise an objection to the number port, which it must do within 18 hours, then the number porting can proceed.

Q. IS AT&T BROADBAND STILL DEPENDENT ON BELLSOUTH ONCE A NUMBER IS PORTED?

A. Yes. Once the number is ported through NPAC, AT&T Broadband must still rely on BellSouth and the availability of BellSouth's systems in order to complete the porting process.

BellSouth must disconnect the number from its system during the porting process. Failure to do so can cause problems with the service to the customer and result in the customer being billed for local service by both BellSouth and AT&T Broadband, which unfortunately does happen from time to time.

Q. HOW LONG SHOULD THE PORTING PROCESS TAKE?

A. BellSouth requires at least four business days, and frequently even more, from the submission of a valid LSR sent after 10 a.m. to complete the process to transition a BellSouth customer to AT&T Broadband.

However, BellSouth can in most cases serve its residential retail customers in as little as one day. According to BellSouth's Monthly State Summary Report for April 2001, BellSouth's Order Completion Interval for residential service for the nine state region was .99 days for non-dispatch orders, which are orders that do not require BellSouth to dispatch a technician. These non-dispatch orders accounted for the vast majority, approximately 94%, of BellSouth's residential orders.

In order for there to be parity with ALECs, the amount of time it takes BellSouth to handle its own non-dispatch orders should be comparable to the amount of time BellSouth requires to handle ALECs' porting orders, which also do not require dispatch of a technician.

Obviously, there is not parity on this issue. The requirement that BellSouth must have at least 4 days, if not more, to complete AT&T Broadband service requests puts AT&T Broadband at a disadvantage from the outset, from both a service and marketing standpoint. Furthermore, any errors by BellSouth that further delay the due dates for number porting only make it more difficult for AT&T Broadband to provide prompt, competitive service to customers.

Moreover, to attract new customers, AT&T Broadband needs the ability to inform its customers of a specific date their service would be activated. As I explain in my testimony, there are a number of problems with BellSouth's provisioning that prevent AT&T Broadband from accurately providing prospective customers with service on the scheduled due date. These delays cause numerous customer complaints, and AT&T Broadband

often issues refunds or credits to customers who have experienced installation delays directly attributed to BellSouth's conduct.

Q. HOW DOES FAILURE TO TIMELY RECEIVE A FIRM ORDER CONFIRMATION (FOC) FROM BELLSOUTH IMPACT AT&T BROADBAND AND ITS CUSTOMERS?

A. AT&T Broadband must often reschedule customers' installation dates because days are added to the porting process. As a result, AT&T Broadband appears unreliable to its new customers. Rescheduling also greatly inconveniences these customers, some of whom make special arrangements, such as taking time away from work, to be at home for technicians. The rescheduling leaves them angry and frustrated with AT&T Broadband. As I have testified, in some cases AT&T Broadband has provided credits to satisfy customers who have complained about these delays, which causes direct financial harm to AT&T Broadband.

Q. HOW SPECIFICALLY HAS BELLSOUTH FRUSTRATED AT&T BROADBAND'S ABILITY TO PROVIDE SERVICE TO CUSTOMERS IN A TIMELY MANNER?

A. BellSouth has been plagued by chronic system malfunctions and outages that prevent AT&T Broadband from processing and executing orders for local service. BellSouth has also hampered AT&T Broadband's ability to submit and process customer service requests by taking down its system for extended periods beyond scheduled maintenance times.

Further complicating matters, following a system outage, BellSouth will record LSRs sent during the outage as being "received" on the date BellSouth's systems are actually restored. If the date AT&T Broadcast actually submits the LSR is different from the BellSouth designated "received" date, BellSouth's system will reject the order because of the discrepancy.

Q. CAN YOU PROVIDE ANY EXAMPLES OF BELLSOUTH'S SYSTEM MALFUNCTIONS THAT AFFECT AT&T BROADBAND'S ABILITY TO PROVIDE TIMELY SERVICE TO CUSTOMERS?

A. Yes, I can. As an example of a system malfunction, BellSouth failed to timely send FAs for hundreds of AT&T Broadband porting orders sent on May 21, 2001. Additionally, BellSouth did not notify AT&T Broadband that there was any system outage at that time. Some of the installations had to be rescheduled, and AT&T Broadband provided credits to accommodate several customers that complained about installation delays caused by BellSouth's failure to acknowledge these May 21 orders.

Nor did BellSouth provide any FOCs for LSRs submitted by AT&T Broadband from June 4 through June 6, 2001, until nearly two weeks later, even though BellSouth is required to provide FOCs within 24 hours of receipt of valid orders. As is often the case, AT&T Broadband received no advance notice from BellSouth of any system outages that would have created this problem. It was only after repeated telephone calls to BellSouth regarding this backlog of customer service requests that AT&T Broadband finally

began receiving the overdue responses nearly two weeks after the requests were sent. This affected approximately 2,800 requests.

When BellSouth failed to issue FOCs for the LSRs submitted in early June 2001, in order to try to avoid rescheduling the installations, AT&T Broadband employees had to call the BellSouth Local Carrier Service Center ("LCSC") on June 18 to find out the status of as many orders as possible and obtain FOCs. Obviously, this manual intervention is time consuming and costly. Despite AT&T Broadband's best efforts to rectify a problem BellSouth caused, many of the installations still had to be rescheduled. This was because BellSouth did not correct the problem prior to the installation dates.

Q IS THE FAILURE TO RECEIVE TIMELY FUNCTIONAL ACKNOWLEDGMENTS (FAs) AND FIRM ORDER CONFIRMATIONS (FOCs) THE ONLY PROBLEM BELLSOUTH HAS IN PROCESSING AT&T BROADBAND REQUESTS TO ESTABLISH LOCAL SERVICE FOR A CUSTOMER?

A. No. In order to change an LSR, for example to modify the way a customer's name appears, AT&T Broadband sends a supplement. When BellSouth receives a supplement, the same series of electronic responses occurs, starting with an FA and hopefully concluding with an FOC. AT&T Broadband has experienced problems with BellSouth's inadequate responses to supplements, as well as LSRs.

Q. WHAT PROBLEMS HAS AT&T BROADBAND EXPERIENCED WITH BELLSOUTH'S RESPONSES TO SUPPLEMENTS?

A. For several days beginning on May 11, 2001, BellSouth rejected each and every order supplement from AT&T Broadband. After AT&T Broadband alerted BellSouth to the problem, on May 15, BellSouth began to respond to some of the supplements. But it continued through May 18 to reject every supplement from AT&T Broadband that changed an installation due date. As a result, AT&T Broadband had to reschedule at least 400 to 500 installations. This was an inconvenience to these customers, some of whom make special plans in order to be at home for technicians. These customers were left with a negative impression of AT&T Broadband's service quality from the outset, through no fault of AT&T Broadband.

Additionally, Donna Cain, Local Services Access Manager with AT&T Broadband in Atlanta, worked over the course of an entire week to finally have BellSouth resolve this problem. Again, this type of manual intervention is time consuming and costly to AT&T Broadband.

Q. YOU HAVE EXPLAINED THE PROBLEMS AT&T BROADBAND HAS EXPERIENCED WITH RECEIVING FUNCTIONAL ACKNOWLEDGMENTS (FAs) AND FIRM ORDER CONFIRMATIONS (FOCs) FROM BELLSOUTH IN A TIMELY MANNER. HAS AT&T BROADBAND EXPERIENCED SIMILAR PROBLEMS WITH RECEIVING REJECTION OR CLARIFICATION NOTICES FOR CUSTOMER ORDERS?

A. Yes. As I have already testified, AT&T Broadband visually verifies customer information through BellSouth's LENS to ensure that the customer information submitted by AT&T Broadband on the LSR matches the information BellSouth has. Nevertheless, BellSouth often issues rejections or clarification notices for allegedly incorrect customer information, even though that information was already verified with BellSouth's own customer service records. These mistakes are unnecessary and cause significant delays. AT&T Broadcast must divert resources to determine why on LSR has been rejected (even though there is no basis for such rejection) and must resubmit the order.

Additionally, BellSouth often issues requests for clarifications that do not adequately explain the particular issue that BellSouth wants addressed, forcing AT&T Broadband to call the BellSouth LCSC just to decipher the request.

When AT&T Broadband responds to these clarification notices, it must resubmit the customer information. This means that the entire 5-day LSR process begins again, adding time to the already lengthy porting process. Once again, AT&T Broadband may be forced to reschedule the customer's installation date and deal with an unhappy customer who blames AT&T Broadband, not BellSouth, for the problem, and may suffer financial harm through rebates or refunds given to such affected customers.

Q. HAS BELLSOUTH EVER ISSUED A CLARIFICATION FOR AN ORDER AFTER IT HAS ISSUED A FIRM ORDER CONFIRMATION (FOC)?

A. Yes. A clarification notice requests additional information on an order. Therefore, after BellSouth accepts the order by issuing a FOC, there should not be any additional clarifications needed. However, BellSouth has responded to LSRs by sending FOCs, and then sending clarification notices on those same LSRs a week or two later. Similarly, in response to AT&T Broadband requests for directory listing service, BellSouth at times sends an FOC first and then a clarification notice on the same day in response to the same order. Obviously, these dual and conflicting responses are illogical and simply create additional, unnecessary work for AT&T Broadband. Furthermore, the end result is that the installation date for AT&T Broadband service can be delayed. Because the customer holds AT&T Broadband accountable for any delays in providing service, these errors by BellSouth have a negative impact on AT&T Broadband's reputation as a provider of telephony service in Florida.

Q. HOW HAS AT&T BROADBAND TRIED TO RESOLVE THESE BELLSOUTH ISSUES THAT IMPACT AT&T BROADBAND CUSTOMER ORDERS?

A. When problems arise during the process of porting a customer's number, technical support should be available through BellSouth's LCSC, which serves as AT&T Broadband's primary point of contact on ordering issues. The LCSC's responsibility is to address ALEC calls regarding orders (i) for which no FOC has been received, (ii) for which an FOC has been issued and installation is pending, or (iii) for which a clarification notice or rejection has been issued. However, dealing with the LCSC is extraordinarily time

consuming and therefore costly for AT&T Broadband. The LCSC does not provide adequate customer or technical assistance.

Q. WHY IS IT TIME CONSUMING TO INTERACT WITH THE BELLSOUTH LCSC?

A. When BellSouth's retail customers want to place a new order or have a question about a pending order, they call BellSouth's Residence Service Center or its Business Service Center. When AT&T Broadband has a question about a pending order, we call the LCSC, where BellSouth personnel are supposed to respond to ALEC inquiries. Until very recently, BellSouth LCSC representatives frequently would limit AT&T Broadband personnel to inquiries about only two purchase order numbers ("PONs") during each telephone call. That meant that if an AT&T Broadband employee had questions about more than two PONs, which was often the case, the AT&T Broadband employee would have to call the LCSC again and again to obtain answers to the rest of his or her questions. Although BellSouth appears to have recently stopped this practice of limiting the number of PONs per call to the LCSC, BellSouth has not informed AT&T Broadband that this is a permanent change in policy. AT&T Broadband is very concerned that the practice will resume once this 271 proceeding has concluded.

Furthermore, each telephone call to the LCSC exhausts AT&T Broadband personnel time. During the first two weeks of June, AT&T Broadband employees tracked their telephone calls to the BellSouth LCSC. For the calls made to the BellSouth LCSC during that two week period, the

average time the AT&T Broadband employees were on hold before BellSouth LCSC representatives even picked up their calls was 3:18 minutes, or 198 seconds.

A measure of parity in customer support is the time it takes BellSouth to answer calls from ALECs as opposed to answering calls from its retail customers. BellSouth includes the latter data in its monthly performance reports. For April 2001, BellSouth reports in the Monthly State Summary Report for the Region a hold time for its retail customers of 118.91 seconds. Based on this data, BellSouth provides ALECs with less than equal customer support.

Q. TO SUM UP YOUR TESTIMONY, HOW HAS BELLSOUTH'S INADEQUATE ASSISTANCE IN PROVISIONING FOR NEW AT&T BROADBAND CUSTOMERS AFFECTED AT&T BROADBAND'S ABILITY TO COMPETE IN THE RESIDENTIAL MARKET?

A. BellSouth's failure to adequately perform basic customer service has prejudiced AT&T Broadband's ability to compete in the Florida market, and clearly illustrates that BellSouth has not met the number portability and other requirements of Section 271 of the Telecommunications Act. Errors and inefficiencies in BellSouth's provisioning have hindered AT&T Broadband's attempts to obtain new local service customers from BellSouth and to serve existing customers. These deficiencies have placed AT&T Broadband at a significant competitive disadvantage to BellSouth. Customers who have selected AT&T Broadband as their local carrier have been forced to endure unreasonable delays and other inconveniences that have not been imposed on

BellSouth customers. As such, BellSouth has not given competitive carriers a meaningful opportunity to compete, and therefore, BellSouth has not met the requirements of Checklist items 2 and 11 for Section 271.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

The Knowledge to Succeed

Course Descriptions

Class Schedules and Registration Forms

CLEC Workshops

Web Based Training

Maps to Training Facilities

Atlanta - 9 Corporate Square

Atlanta - 675 W. Peachtree St.

Birmingham

Customer Guides

You're ready to take on new markets, new services, new opportunities. And as any Competitive Local Exchange Carrier (CLEC) knows, each and every person behind your operation contributes to your success. That's why training is so critical. It's all about arming your staff with the information they need in an effort to make the most of your resources - from tariffs and trouble reporting systems, to provisioning procedures and reconfiguration tools.

BellSouth offers CLEC/Carriers curriculum designed to deliver the information you need to improve efficiency increase productivity and give your business a decided advantage. Better yet, we give you a choice of training at your site and online training to help you make the most of your time and budget. No matter what training method you select, each course represents the best in premium, quality instruction for making your business run better than ever.

Provisioning Services

Access Service Requests (ASRs) and Local Service Requests (LSRs) are critical to allowing you to offer services to your customers. If requests aren't completed correctly or are not delivered on time, you run the risk of losing customers. What are you going to do? Turn to BellSouth. We have professionals who can help you every step of the way, including:

- planning and implementation of simple and complex orders for ASRs and LSRs
- designing customized templates for UNE, Residential and Non-complex Business

With BellSouth® Service Ordering Provisioning Services, you can take the risks out of ASR/LSR provisioning. And focus on what you do best - serving your customers.

Instructor-Led Classes

Instructor-led classes are held at BellSouth facilities in Atlanta, GA., and Birmingham, AL. The curriculum includes a range of business-critical topics delivered by experienced, certified BellSouth instructors.

Choose from introductory course designed for establishing basic skills, or advanced technical courses that cover in-depth technical concepts and practices. Comprehensive reference materials along with hands-on instruction enhance the learning process and reinforce concepts.

Suitcase Training

To address the specific need of your serving area and service portfolio, BellSouth offers suitcase training where we bring our quality instruction techniques and resources to your facility. We start with a thorough

evaluation of your unique training requirements in order to design a customized curriculum just for you. We'll pull from our existing courses and then tailor the content to fit your needs, including tariffs for your area as well as detailed order examples. Because the information is streamlined for your specific needs, we're able to make the most of the time you spend in training. Plus, on-site delivery means that you save on travel costs and minimize time out of the office.

Online Training

To take advantage of BellSouth's training resources without even leaving your desk, online training is available for selected topics. Students choose when to participate which allows them to pace the material according to their level of expertise and schedules. Online content is easy to navigate and serves as a convenient reference tool. It's a great way to keep your personnel in the know, while saving a bundle on travel expenses and time.

Tax Credits

Financial restraints should never be an issue when it comes to training. There are many grants and tax credits available for training in every state. While many companies take advantage of a few of the widely known tax credits, literally millions of dollars are unclaimed each year because companies are unaware of all the benefits available.

Items to consider:

1. You may recover up to 50% of your training costs
2. Certain tax credits allow you to recover up to three previous tax years
3. Tax credits recovered may be spread out over ten years

Funds are available now and training your employees not only makes your company stronger but helps it to grow as well.

Select a Course

1.5 Overview of the Local Exchange Navigation System

LENS is an on-line, interactive, menu driven system which permits subscribers to perform inquiry functions, and process requests for various products, features and services currently offered by BellSouth. LENS may be used for either new service (no existing telephone number) or existing service.

Information entered via LENS for a firm order populates portions of the Local Service Request (LSR) automatically. It facilitates the mechanized generation of service orders without manual intervention from the Local Carrier Service Center (LCSC).

Options available for the Inquiry function include validating addresses, reserving telephone numbers, viewing features and services for specific NXXs, viewing an installation calendar in order to estimate a due date interval and viewing customer record information.

Note: LENS does not retain information in the Inquiry function. If the information you obtain in Inquiry will be needed at a later date, either print the information out, write it down or save it electronically.

Options available for the Firm Order function include validating addresses, viewing customer record, submitting changes to existing accounts, selecting telephone numbers or using previously reserved telephone numbers, viewing and selecting features and services, calculating due date, and submitting an LSR. You can also view Firm Order Confirmations (FOC) or Completion Notices (CN), Service Order Status and Local Service Requests (LSRs) in error.

Pending orders for telecommunications services can be accessed by CLECs to determine their status, however, CLECs can only access orders which they have placed via LENS. CLECs can not access service orders placed by BellSouth or other CLECs.

LENS provides you access to the same Operational Support Systems that BellSouth's service centers use. System availability and response times will be the same for you as they are for the BellSouth service centers.

Address information maintained in BellSouth's databases are 911/E911 compliant and do not necessarily match those listed with the U.S. Postal service. If you have trouble validating an address, question the customer for additional information, or ask for the telephone number of a nearby neighbor, or business. This will help with the validation process.

The current version of LENS is based on the **OBF Standard Issue 9 map.**

Note: LENS supports most popular web browsers, however, BellSouth recommends using Microsoft Internet Explorer version 4.0 or higher, or Netscape version 4.0 or higher. America On-Line IS NOT currently compatible with the LENS application.

CG-LEOO-009
Issue 9L-March 30, 2001
CHAPTER 2.0 - General Local Service Ordering Information

2.6 Manual and Electronic Ordering

CLECs can submit orders either manually or electronically. Depending upon the method chosen, the CLEC may have to provide different information to BellSouth®, that is, some data elements may be applicable only to manual or electronic orders, not both. For example, many of the data elements in the Administrative section of the LSR are repeated on each of the manual forms and must be completed to match the information on the LSR. These fields include PON, VER, AN and ATN. When submitting an electronic request, however, these fields are populated once and the data flows through to all subsequent screens used in the order. Please watch for these types of distinctions as they are made throughout this document.

2.6.1 LCSC Contact Telephone Numbers

The Local Carrier Service Center (LCSC) is the single point of contact for a CLEC when manually submitting orders. Use the telephone numbers below to contact the LCSC for questions relating to manually submitted local service requests and billing inquiries. All completed local service ordering forms may be sent via facsimile to the number indicated below. Prior to submitting service requests each CLEC will be assigned to either the Atlanta, Georgia or Birmingham, Alabama (LCSC).

Atlanta LCSC	Telephone Number	Fax Number
Resale - Consumer	800-872-3116	800-872-7059
Resale - Small Business	800-872-3116	877-711-0379
Unbundled Network Elements and Local Number Portability	800-872-3116	877-489-7633
Billing	800-872-3116	205-321-2724

Birmingham LCSC	Telephone Number	Fax Number
Resale - Consumer Order	800-773-4967	888-704-9368
Resale -Business Order	800-773-4967	800-773-4970
Facility Based Order	800-773-4967	888-792-6271

Billing	**800-773-4967**	**205-321-2817**

2.6.2 Electronic Downtime

Occasionally, BellSouth® may experience brief periods outside of normal maintenance downtime where a specific system is unavailable for CLECs to transmit mechanized LSRs. If a CLEC must submit a particular LSR manually before the electronic system is restored to service, BellSouth® will apply the mechanized LSR charge instead of the manual LSR charge for that service request. This policy applies only for those CLECs who would normally use the unavailable electronic system if it had been available. The CLEC must follow the procedure below for each manually submitted LSR in order to receive the mechanized LSR charge:

1. Populate the LSR NO. (LSR Number) field in the Administrative Section on the first page of the LSR form with the code " SOMEC".
2. Complete all required pages of the LSR form that pertain to the service being ordered.

If this procedure is not followed, the manual LSR charge will be applied as required for manual LSRs in compliance with current CLEC Interconnection and Resale agreements.

Customer Guide
CG-LNCL-001
Issue 3, April, 2001

BELLSOUTH

LNP Reference Guide

Interconnection Services

Copyright

March 1999 - April, 2001

Contents

Introduction

Purpose

This document contains information on Local Number Portability for CLECs interested in ordering this service from BellSouth®. This Guide is intended to increase the CLECs understanding of LNP Order Process at BellSouth®, to provide guidelines for LSR completion, and to offer information on critical success factors for LSR submission.

This guide is intended to be used as a supplement to, not a replacement for, the **BellSouth® Business Rules for Local Ordering** and the **LEO Implementation Guide**, which are available on-line through the BellSouth® Interconnection web site at: **http://www.interconnection.bellsouth.com/guides/guides.html**

Any questions regarding this document should be forwarded to the BellSouth Account Team.

Version Information

Table A Revision History

Chapter	Action Request #	Date/Issue	Description
Requirements for LNP Ordering	N/A	April 2001 / 3	Added the following verbiage to the Local Number Portability Rules section: When converting an existing DS1 with telephone numbers riding the DS1, the following process is to be used. One LSR REQTYP A is to be submitted to establish the DS1 loop and any channelization requested. A second LSR REQTYP C is to be submitted for the LNP of the telephone numbers to be ported once the DS1 has been turned up. This is a two step process necessary to ensure that the end user customer will have limited service interruption.
Requirements for LNP Ordering	N/A	April 2001 / 3	Added rule for WATCHALERT® service to the Local Number Portability Rules table.
Description of LNP	N/A	October 2000/2d	Corrected URL address for BellSouth Implementation Schedule Plan.
LNP Order Process - Port Out and Port Out with Loop	N/A	October 2000/2d	Removed reference to the BellSouth Ordering Guide in Step Action Table 1.1.

- continued -

Table A Revision History (continued)

Chapter	Action Request #	Date/Issue	Description
Minimum Required Fields for Faxed LNP Orders	N/A	October 2000/2d	Removed reference to LSOG 2 ordering.
LSR Order Forms for LNP	N/A	October 2000/2d	Removed references to LSOG 2 and the BellSouth Ordering Guide for CLECs. Modified example from: "If a REF NUM is used on the Directory Listing Request form, it may not be repeated on the Number Portability/Loop form or the End User Disconnect form." to read "If a REF NUM is used on the End User Disconnect form, it may not be repeated on the Number Portability/Loop form."
Frequently Asked Questions NPAC Communication	N/A	October 2000/2d	Added note to question 4 : "With the implementation of Number Pooling, the Telephone Number Disconnect function will return the telephone number to the code owner for the NPA NXX -T000. If the number block has been donated but not allocated, the telephone is returned to the Block Administration Center. If the number block has been allocated, the telephone number is returned to the LEC that owns the block. "
Appendix References	N/A	October 2000/2d	Removed reference to BellSouth Ordering Guide for CLECs.
Introduction	N/A	August 2000/2c	Added contact verbiage " Any questions regarding this document should be forwarded to the BellSouth Account Team. "

- continued -

Table A Revision History (continued)

Chapter	Action Request #	Date/Issue	Description
LNP Order Status	N/A	May 2000/2b	Document name changed to "LNP Reference Guide" "LNP Order Status" moved to "Requirements for LNP Ordering" chapter "Reference" section moved to the Appendix "LNP Ordering Checklist" section moved to "Critical Success Factors for LNP Ordering Chapter" Added the following verbiage to the LNP Order Status Section: "Completion notification (CN) is sent when all service orders associated with the LSR are complete and all telephone numbers have been activated by the CLEC." Added a fourth question to "Frequently Asked Questions" section Removed "Job Aid" section
Various	N/A	April 2000 / 2a	General Revision to remove information also contained in BellSouth Business Rules for Local Ordering, and include references.
Various	N/A	March 2000 / 2	Added an Appendix section, containing, a Directory Listing Job Aid for LEO-IG Volume 1, Version 7, BellSouth® Business Rules for Local Ordering (effective April 7, 2000) and for LESOG Version 2 Form; a Job Aid for EATN, EAN, ATN, AN and BAN fields for LEO-IG Volume 1, Version 7, BellSouth® Business Rules for Local Ordering (effective April 7, 2000) and LESOG Version 4 Form; and a Job Aid for CRIS (SLI) Loop Ordering for LEO-IG Volume 1, Version 7 and LESOG Version 4 Form (effective April 30, 2000). Deleted Minimum Required Fields for faxed LNP Orders Section (including tables) Deleted Faxed Loop Service with Number Portability Fields Section Included copyright symbols General Revision
Various	N/A	November 1999/ 1c	Add web site for LNP Implementation Schedule. Add reference for POS and CN on EDI/TAG PONs.

- continued -

Table A Revision History (continued)

Chapter	Action Request #	Date/Issue	Description
Various	N/A	October 1999/ 1b	General Revision
Various	N / A	April 2, 1999 / 1a	General Revision
All	N / A	March, 1999 / 1	First Issue

1. Introduction to Local Number Portability

1.1 Description of LNP

Local Service Provider Portability

Local Number Portability (LNP) is a part of local competition that provides end users with the ability to retain their phone numbers when they change their Local Service Provider.

Phase	Description
Local Service Provider Portability (SPP)	Allows customers to keep their current telephone number(s) if they chose to switch from their current Local Service Provider to another.

The Telecommunications Act of 1996 requires BellSouth® to provide a mechanism for customers to retain their current telephone numbers when they change their Local Service Provider.

Orders of the FCC pursuant to the Telecommunications Act of 1996 provide deadlines for implementing Local Service Provider Portability (SPP) in the top 100 metropolitan areas in the United States. The BellSouth® territory includes 21 of the top 100 metropolitan areas. To learn more about BellSouth's Implementation Schedule Plan, please visit us at:

Note: http://g8058183.ga.bst.bls.com/ibu/files/infra_lnp/lnp/lnptrack.xls

1.2 Network Provisioning for Local Number Portability

Interim Number Portability (INP) is a temporary solution for porting numbers which involves two telephone numbers to route calls to the serving wire center using one of the following methods:

- Remote Call Forwarding
- Direct Inward Dialing
- Route Index Hubbing

Local Number Portability (LNP) is the long range solution for Service Provider Portability (SPP) and includes the following characteristics:

- Uses only one telephone number
- Requires significant network architecture hardware and software upgrades
- Uses the Advanced Intelligent Network (AIN)
- Requires new routing methodology to send calls to the wire center of the company currently providing the local service.

Note: All calls to a portability port eligible NPA— NXX will route using the AIN to look up the correct routing information (LRN) for the telephone number.

The **LNP Gateway (LNP-GW)** is a major link in the LNP process for BellSouth® since it provides both internal and external communications with various interfaces and processes, including:

- Linking BellSouth® to the Number Portability Administration Center (NPAC)
- Allowing for inter-company communications between BellSouth® and the CLECs for electronic ordering
- Providing interface between NPAC and AIN SMS for LNP routing processes.

The **Number Portability Administration Center (NPAC)** is a neutral third party organization that oversees the porting of telephone numbers for Local Number Portability. The NPAC maintains and communicates LNP-related data including

- Old Service Provider ID (OCN)
- New Service Provider ID (OCN)
- Local Routing Number (LRN)
- Due Dates
- CLASS-DPC
- CLASS-SSN
- LIDB-DPC
- LIDB-SSN
- CNAM-DPC
- CNAM-SSN
- ISVM-DPC
- ISVM-SSN

The BellSouth® LNP Gateway must communicate with the NPAC as to whether numbers are porting out or porting in. The messages sent to and from the NPAC are called Subscription Versions (SVs). Subscription Versions are the messages that flow through the NPAC to provide information for routing calls to ported numbers. The SV can only contain one telephone number (TN), which means that one LSR may have many TNs and SVs associated with it.

2. LNP Order Process Flows

2.1 High Level LNP Order Process Flow and Narrative

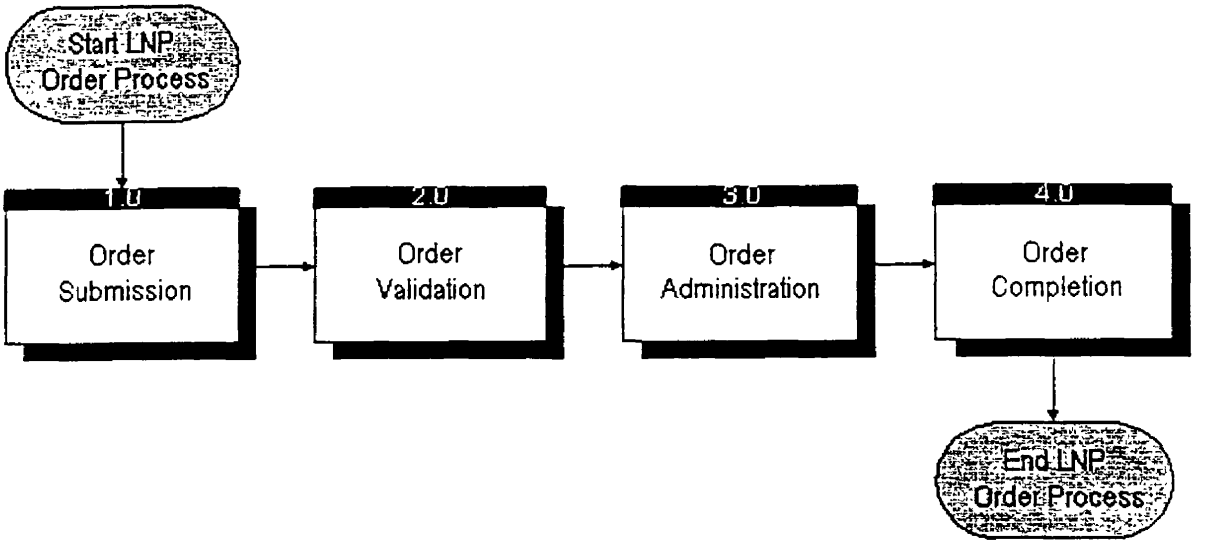

Figure 1 High Level LNP Order Process Flow

1.0 Order Submission1.1

Process Step: CLEC sends LNP LSR to BellSouth® LCSC via fax, EDI, or TAG.

2.0 Order Validation

Process Step: BellSouth® validates CLEC LSR for errors, and requests clarification when necessary.

3.0 Order Administration

Process Step: BellSouth® sends FOC to CLEC if clarification is not needed. CLEC receives FOC and immediately sends Create SV to NPAC. BellSouth® then sends Concur SV to NPAC. The CLEC sends the Activate SV to NPAC on the Due Date, porting the number.

4.0 Order Completion

Process Step: BellSouth® completes the Disconnect listing order (if applicable) and sends E911 Unlock message to SCC. CLEC sends E911 Migrate message to SCC.

2.2 Detailed LNP Order Process Flow and Narrative

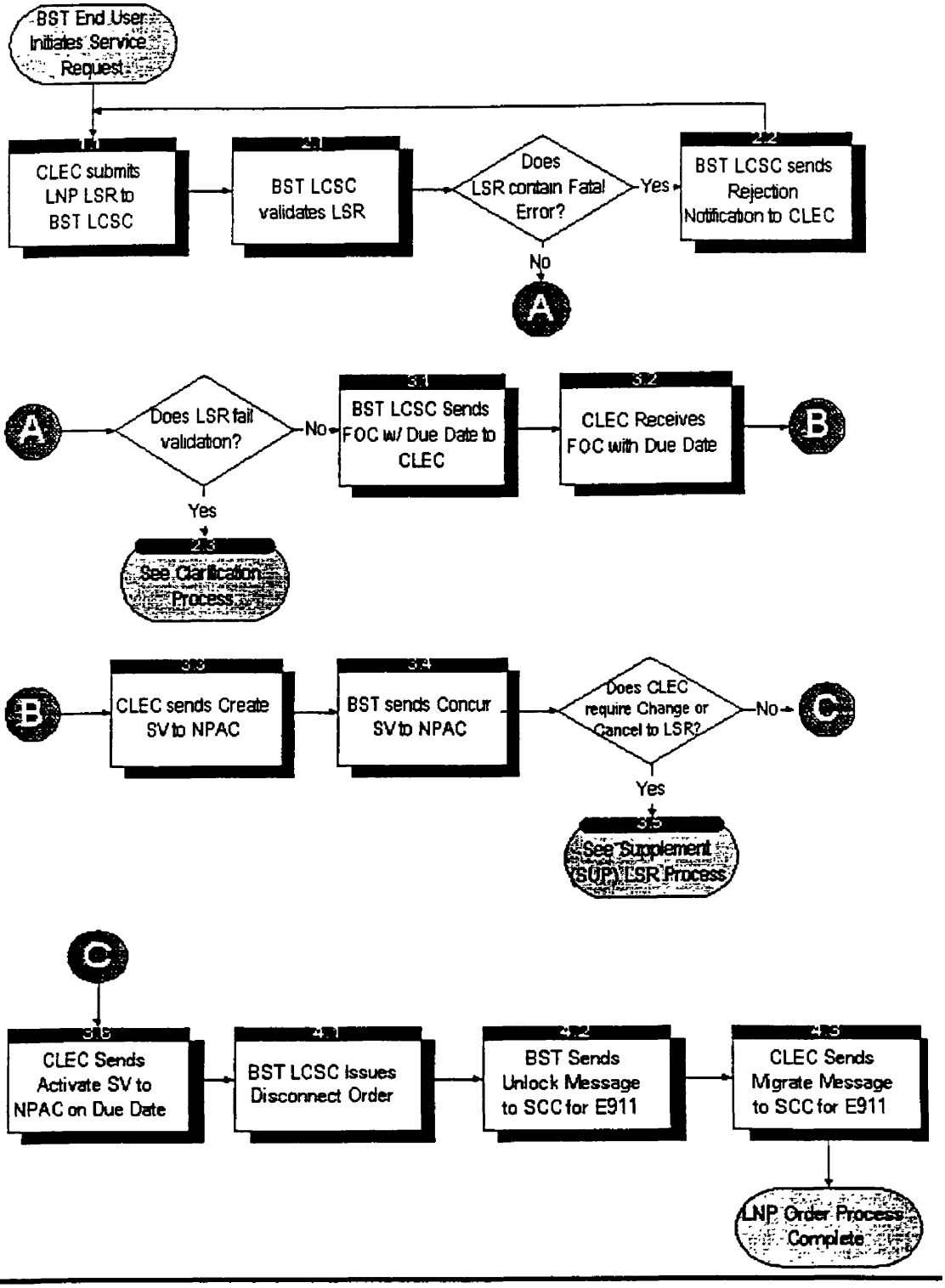

Figure 2 Detailed LNP Order Process Flow

2.2.1 LNP Order Process - Port Out and Port Out with Loop

1.0 Order Submission

1.1

Step	Action
Process Step:	**CLEC sends LNP LSR to BST LCSC via fax, EDI or TAG**
Predecessor:	BellSouth® End User initiates LNP Request with CLEC
Input:	End-user CSR; order forms; BellSouth® Standard Interval information; BellSouth® LNP Ordering Checklist
Output:	BellSouth® LCSC receives paper copy LSR via fax server OR digital LSR for EDI or TAG orders
Key Interface:	Fax; EDI, TAG

Note: LSR format defined by OBF

2.0 Order Validation

2.1

Step	Action
Process Step:	**BST LCSC validates LSR**
Predecessor:	CLEC submission of LSR
Input:	CLEC LSR
Output:	Validated LSR
Key Interface:	BellSouth® LNP-Gateway

Note: CLECs may access pre-order support using a web browser and the **LENS** interface. Use the Inquiry function to confirm the accuracy of customer record information, address, etc.

Decision Point

Step	Action
Process Step:	*** Does LSR contain Fatal Error?**
If YES,	Proceed to 2.2 "BST LCSC sends Rejection Notification to CLEC"
If NO,	Proceed to Decision Point "Does LSR fail validation?"

Note: *Fatal Reject errors include missing required fields, duplicate PON, and invalid entries.

2.2

Step	Action
Process Step:	**BST LCSC sends Rejection Notification to CLEC**
Predecessor:	CLEC LNP LSR contains fatal errors
Input:	Rejected LSR
Output:	Notification of fatal errors sent to CLEC
Key Interface:	Fax, EDI, TAG, BellSouth® LNP-Gateway

Note: Fatal reject notices for EDI or TAG orders will be transmitted electronically via EDI or TAG. Fatal reject notices for faxed orders will be transmitted via fax.

Decision Point

Step	Action
Process Step:	**Does LSR fail validation?**
If YES,	Proceed to 2.3 "Clarification Process"
If NO,	Proceed to 3.1 "BellSouth® LCSC Sends FOC with Due Date to CLEC"

2.3
See Clarification Process

3.0 Order Administration

3.1

Step	Action
Process Step:	**BST LCSC Sends FOC with Due Date to CLEC**
Predecessor:	CLEC LSR passes BellSouth® LNP Gateway validation.
Input:	Valid LSR
Output:	FOC is sent to CLEC via EDI, TAG, or fax; BellSouth® LCSC issues 10 digit trigger order if applicable.
Key Interface:	EDI, TAG, fax, BellSouth® LNP Gateway

Note: "Trigger" may not be applicable for all types of service. For Port Out with Loop, all service orders are issued at this time. The UNE Center ensures that the orders are complete when the loop is turned up.

3.2

Step	Action
Process Step:	**CLEC receives FOC with Due Date**
Predecessor:	BellSouth® LCSC sends CLEC FOC via fax, EDI, or TAG
Input:	Valid LSR with FOC
Output:	CLEC receives FOC with Due Date
Key Interface:	Fax; EDI, TAG

3.3

Step	Action
Process Step:	**CLEC sends Create SV to NPAC with Due Date on FOC and Time set to 00:00**
Predecessor:	FOC received by CLEC
Input:	FOC with Due Date sent by BellSouth® LCSC
Output:	NPAC notifies BellSouth® LCSC that CLEC has sent Create SV
Key Interface:	NPAC - Service Order Administration (SOA); BellSouth® LNP Gateway

Note: SV - Subscription Version BellSouth® will place SVs in Conflict if CLEC sends the Create SV to NPAC prior to CLEC receiving FOC from BellSouth®.

3.4

Step	Action
Process Step:	**BST LCSC sends Concur SV to NPAC with Due Date on FOC and Time set to 00:00**
Predecessor:	BellSouth® receives notification of Create SV from NPAC
Input:	Create SV sent by CLEC to NPAC
Output:	NPAC notifies CLEC that Concur SV has been sent by BellSouth®
Key Interface:	NPAC - Service Order Administration (SOA); BellSouth® LNP Gateway

Note: BellSouth® LCSC has 18 hours after Create SV to send Concur SV to NPAC.

Decision Point

Step	Action
Process Step:	**Does CLEC require Change* or Cancel to Original LSR?**
If YES,	Proceed to 3.5 "Supplement (SUP) LSR Process"
If NO,	Proceed to 3.6 "CLEC sends Activate SV to NPAC with Due Date on FOC"

Note: *Change to original LSR includes: Due Date change; Add/Remove TNs.

3.5
See Supplement (SUP) LSR Process

3.6

Step	Action
Process Step:	**CLEC Sends Activate SV to NPAC on Due Date on FOC**
Predecessor:	BellSouth® LCSC sends Concur SV to NPAC
Input:	CLEC receives Concur SV from NPAC
Output:	NPAC receives Activate SV from CLEC on Due Date on FOC
Key Interface:	NPAC - Service Management System (SMS); BellSouth® LNP Gateway

Note: BellSouth® is no longer responsible for customer after CLEC sends Activate SV to port the number.
Activate SV should be sent for all telephone numbers on the LSR.

4.0 Order Completion

4.1

Step	Action
Process Step:	**BST LCSC Issues Disconnect Order** and Listing Order (if applicable) for Port Out without loop.
Predecessor:	CLEC sends Activate SV to port number.
Input:	NPAC notification of CLEC Activate SV sent to BellSouth®
Output:	Disconnect service orders issued by BellSouth® LCSC
Key Interface:	NPAC - Service Management System (SMS); BellSouth® LNP Gateway

Note: Following this point, questions regarding maintenance & repair should go to the UNE Center.
LCSC will not issue disconnect until the Activate SV is received for all telephone numbers on LSR.

4.2

Step	Action
Process Step:	**BST sends Unlock Message to SCC for E911**
Predecessor:	BellSouth® completes Disconnect service order
Input:	Disconnect service order
Output:	SCC receives BellSouth's Unlock message
Key Interface:	SCC

Note: BellSouth® will not send the Unlock message to SCC before the Disconnect service order is complete. BellSouth® will not send the Unlock message for E911 until Activate SV is received for all telephone numbers on LSR.

4.3

Step	Action
Process Step:	**CLEC Sends Migrate Message to SCC for E911**
Predecessor:	BellSouth® Unlock message has been received by E911 SCC
Input:	BellSouth® Unlock message
Output:	E911 record locked
Key Interface:	SCC

Note: If CLEC Migrate (Lock) message makes it to SCC before BellSouth's Unlock Message, then the CLEC message goes on an error report. BellSouth® will not send Unlock message to SCC until CLEC has sent Activate SVs to NPAC for all telephone numbers on LSR.

3. LNP Clarification and Supplement (SUP) LSR Process Flows

3.1 Detailed LNP Clarification Process Flow and Narrative

Clarifications

Any LSR will be returned to the CLEC for clarification when BellSouth® is not able to issue the orders requested due to:

- Incomplete information
- Incorrect information
- Conflicting information

1. For faxed requests, the CLEC has 10 business days to respond to the request for clarification by submitting a supplemental LSR.
2. If no response is received by BellSouth® LCSC within 10 business days, the LSR will be canceled on the eleventh business day.
3. If original LSR is canceled by BellSouth®, a new LSR with new PON must be submitted.
4. CLEC should not send Create SV to NPAC until an FOC has been received.
5. BellSouth® will place SVs in Conflict if CLEC sends Create before FOC is received.
6. Clarifications for EDI or TAG orders are sent via EDI or TAG. The CLEC has 30 days to respond to the clarification through EDI or TAG.

Note: * SUP LSRs must be sent using the same ordering method as the original LSR (i.e., Fax, EDI, TAG)

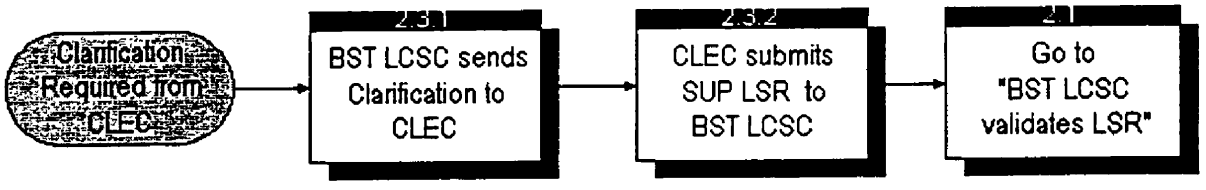

Figure 3 Detailed LNP Clarification Process Flow

3.1.1 Clarification Process

2.3.1

Step	Action
Process Step:	**BST LCSC sends Clarification to CLEC via Fax, EDI, or TAG**
Predecessor:	LSR falls out of BellSouth® LNP-Gateway and requires clarification
Input:	LSR rejected by BellSouth® LNP-Gateway for clarification
Output:	Clarification sent to CLEC via fax, EDI, or TAG
Key Interface:	Fax, EDI, TAG

2.3.2

Step	Action
Process Step:	**CLEC submits SUP LSR via fax, EDI, or TAG to BST LCSC**
Predecessor:	LSR falls out of LNP-Gateway and requires clarification
Input:	Clarification sent by LCSC via fax, EDI, or TAG to CLEC
Output:	SUP LSR sent to LCSC
Key Interface:	Fax; EDI, TAG

Note: SUP must be sent via the same channel (EDI, TAG or fax) as the original LSR.

2.1
Go to "BST LCSC validates LSR"

3.2 Detailed Supplement (SUP) LSR Process Flow and Narrative

Supplement (SUP) LSR

1. If CLEC intends to port on any day other than the Due Date stated on the FOC, the CLEC should send BellSouth® a SUP LSR prior to the due date originally stated on the FOC.
2. A supplemental change LSR (SUP) must reflect the same PON, CC, ATN, AN, EATN, EAN, ACT, and NPT as the original request.
3. SUP must also have a higher VER number and SUP field entry complete
4. EDI/TAG vs. FAX: EDI or TAG and Fax requests may not be combined for the same PON. If an LSR is submitted via:
   - EDI, all SUPs for the PON must be sent through EDI
   - TAG, all SUPs for the PON must be sent through TAG
   - Fax, all SUPs for the PON must be faxed

   Example: The original LSR is sent via EDI and then placed in clarification by the LCSC. CLEC must send a SUP through EDI to change or cancel the request.

Additionally, a supplemental change (SUP) LSR will be required if a CLEC:

- Has been asked for clarification on an LNP LSR
- Is requesting a Due Date Change
- Would like to cancel an LSR
- Would like to add/remove telephone numbers for porting on LSR

If a CLEC is changing the original LSR, a SUP LSR must be filed with BellSouth® prior to any contact with NPAC.

Note: SUP LSRs must be sent using the same ordering method as the original LSR (i.e., Fax, EDI, TAG)

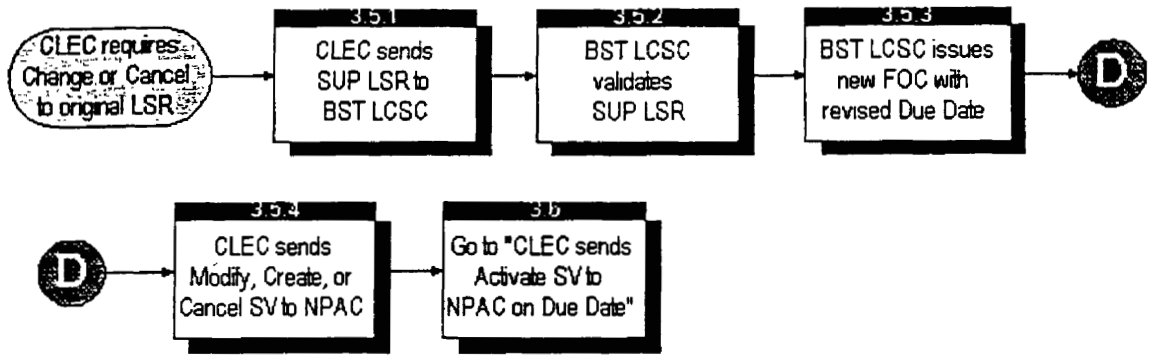

Figure 4 Detailed Supplement (SUP) LSR Process Flow

3.2.1 Supplement (SUP) LSR Change Process

3.5.1

Step	Action
Process Step:	**CLEC sends SUP LSR to BST LCSC**
Predecessor:	Create and Concur SV received by NPAC for original LSR
Input:	Original FOC and LSR; SUP LSR
Output:	BST LCSC receives SUP LSR via fax, EDI, or TAG
Key Interface:	EDI, TAG, Fax

Note: SUP LSR must be sent to BellSouth® LCSC and revised FOC received by CLEC prior to CLEC sending Modify SV to NPAC. CLEC must complete SUP field and VER field on LSR form.

3.5.2

Step	Action
Process Step:	**BST LCSC validates SUP LSR**
Predecessor:	CLEC submission of SUP LSR
Input:	CLEC SUP LSR
Output:	Validated SUP LSR; BellSouth® updates internal records with supplemental information on LSR
Key Interface:	BellSouth® LNP-Gateway

3.5.3

Step	Action
Process Step	—
Predecessor:	BellSouth® receives and validates SUP LSR from CLEC
Input:	SUP LSR; original LSR and FOC
Output:	BellSouth® LCSC updates internal records with new Due Date; new FOC sent to CLEC via fax, EDI, or TAG
Key Interface:	BST LNP-Gateway, EDI, TAG, fax

Note: CLEC must receive FOC prior to sending Modify SV to NPAC. Revised Due Date on FOC will be based on the receipt of SUP LSR and the BST Standard Intervals.

3.4

Step	Action
Process Step:	**CLEC sends Modify, Create or Cancel SV to NPAC**
Predecessor:	CLEC receives revised FOC with new Due Date

Step	Action
Input:	SUP LSR; Revised FOC with new Due Date
Output:	NPAC receives Modify, Create, or Cancel SV
Key Interface:	NPAC - Service Order Administration (SOA)

Note: If changing the Due Date on LSR, CLEC sends a Modify SV

- If removing TNs to port from original LSR, CLEC sends a Cancel SV for each TN.
- If adding TNs for porting, CLEC sends Create SVs for each new TN on the SUP LSR.
- If canceling the original LSR, CLEC sends Cancel SV to NPAC.

3.5
See Supplement (SUP) LSR Process

3.6

Step	Action
Process Step:	**CLEC Sends Activate SV to NPAC on Due Date on FOC**
Predecessor:	BellSouth® LCSC sends Concur SV to NPAC
Input:	CLEC receives Concur SV from NPAC
Output:	NPAC receives Activate SV from CLEC on Due Date on FOC
Key Interface:	NPAC - Service Management System (SMS); BellSouth® LNP Gateway

Note: BellSouth® is no longer responsible for customer after CLEC sends Activate SV to port the number. Activate SV should be sent for all telephone numbers on the LSR.

4. Requirements for LNP Ordering

4.1 Basic Requirements

A telephone number may port out when all of the following are true:

- NPA NXX is portable
- Telephone number is a working BST number or end user is paying to reserve the number
- End user name on the LSR matches the BellSouth customer record
- End user address on the LSR is in the same Toll Message Rate Center (TMRC) as the address on the BellSouth® customer record
- Number is associated with a line type that is portable. (Refer to Local Number Portability Rules - Section 4.2 below to determine if service type is portable and if a trigger order is necessary)

Note: LSRs for INP

LSRs requesting Interim Number Portability (INP) will not be accepted with due dates by BellSouth® after the completion for each phase. If the due date is between ready to port and completion date, the CLEC may request INP or LNP.

The responsibilities for porting out telephone numbers are described in the following table.

Table B The responsibilities for porting out telephone numbers are described in the following table

Work Group	Responsibilities
CLEC	• Send LSR to BellSouth® to request number(s) to be ported. • Receives FOC before sending SVs to NPAC. • Provide service to end user. • Notify the NPAC when ready to port the number. • Update E911 information. • Send SUP LSR to change Due Date, Cancel LSR, or modify TN on LSR.
LCSC	• Process LSR and FOC for port out requests. • Issue trigger/port out/listing/loop service orders. • Send and receive NPAC messages.
UNE Center	• Coordinate port out with loop orders with CLEC as needed. • Complete port out with loop orders as needed. **Note:** UNE Center is involved in provisioning only if loop is requested.

4.2 Local Number Portability Rules

The following table may be used to determine if the service type is portable and if a trigger order is required. The existing service or line type is for reference only because the service is not portable. Only the number is ported.

When converting an existing DS1 with telephone numbers riding the DS1, the following process is to be used. One LSR REQTYP A is to be submitted to establish the DS1 loop and any channelization requested. A second LSR REQTYP C is to be submitted for the LNP of the telephone numbers to be ported once the DS1 has been turned up. This is a two step process necessary to ensure that the end user customer will have limited service interruption.

Table C Local Number Portability Rules

Service / Line Type	Portable - w/LRN	Trigger	Notes
AdWatch	Y	N	The number will no longer work for AdWatch once it is Ported.
Cellular	N		
Choke Codes	N		Does not involve LRN
Denied for Non-Pay	Y	N	Must be ported prior to disconnection of service.
DID (Block of 20)	Y	N	To Port a portion of a range may require special assembly.
ESSX® / MultiServ®	Y	Y	If lines are in a hunting arrangement, see Hunting Lines below.
FX / FCO	Y	Y	The number can be ported within the same Toll Message Rate Center (TMRC). The BST designed circuit will be disconnected and the new service provider must establish the service.
Hunting Lines	Y	Y	If not all of the numbers in the hunt group are porting, the numbers porting must be removed from the hunt group the day before the port due date. CLEC can determine Frame Due Time or use BST default of 9:00 PM day before Port.
ISDN	Y	Y	
N11	N		
Out dial trunks	Y	N	
Pager Numbers	N		
Party Line	Y	N	The number may be ported without loop. The BST service must be disconnected
Remote Call Forwarding / Interim Number Portability	Y	N	
Reserved numbers	Y	N	Only numbers reserved with chargeable USOCs may be ported

- continued -

Table C Local Number Portability Rules (continued)

Service / Line Type	Portable - w/LRN	Trigger	Notes
RingMaster®	Y	N	
Sub-Let	Y	Y	
Surrogate Client Number	Y	N	
Suspend for season	Y	N	
Switched Access	N		
Uniserv®	N		The lead number is not portable but subsequent TNs can be ported.
Warm Line	N		
WATCHALERT®	Y	Y	WATCHALERT® service will no longer work when the associated TN is ported.
ZipCONNECT®	N		

4.3 Required Forms For Faxed Requests

Required Forms for Port Out

The CLEC submits the following forms to the LCSC to request telephone numbers to Port Out:

- Local Service Request (LSR)
- End User (EU)
- Number Portability (NP) or Loop Service with Number Portability (LSNP)

Conditional Forms for Porting Out

- Directory Listing Request (DLR)

LNP Order Form Matrix

Table D LNP Order Form Matrix

When Ordering:	These Forms Are:				
	LSR	EU	NP	LSNP	DLR
Number Portability	R	R	R	P	C*
Loop Service with Number Portability	R	R	P	R	C*

Form Names:	Form Requirements:
LSR = Local Service Request Form	R=Required
EU = End User Form	R=Required
NP = Number Portability Form	C=Conditional
LSNP = Loop Service with Number Portability Form	O=Optional
DLR = Directory Listing Request Form	

Required Forms for SUPs

A supplemental change (SUP) LSR will be required if a CLEC:

- Has been asked for clarification on an LNP LSR
- Is requesting a Due Date Change
- Would like to cancel an LSR
- Would like to add/remove telephone numbers for porting on LSR.

Use the **LNP Order Matrix Form** above to determine which order forms must be used.

A supplemental change LSR (SUP) should contain complete information and will supersede the original LSR. The SUP must reflect the same PON, ACT, NPT, and CC from the original request. It must also have a higher version number in the VER field. For faxed requests, the SUP field must be populated with:

1. to Cancel. (Prohibited if CLEC has sent Activate SV to NPAC for any numbers on the LSR)
2. for Desired Due Date changes. The new date is specified in the DDD field. If the request is to establish a due date less than the standard interval (from the date the SUP is sent), the EXP field must also be populated.
3. for other types of changes. This includes adding or removing porting numbers. Also includes requests for a change in desired due date in conjunction with other changes to a

pending order. The standard interval should be used to establish a new due date when adding or removing ported numbers.

EDI, TAG and Fax requests may not be combined for the same PON. If an LSR is submitted via:

- EDI, all SUPs for the PON must be sent through EDI.
- Fax, all SUPs for the PON must be faxed.
- TAG, all SUPs for the PON must be sent through TAG.

4.4 Minimum Required Fields for Faxed LNP Orders

For TCIF 7 ordering refer to LEO-IG volume 1.

For LSOG 4 / TCIF 9 ordering refer to BellSouth Business Rules for Local Ordering.

4.5 Complex LNP Orders

Definition of Complex Services

The Local Number Portability (LNP) request is classified as complex if the number(s) being ported out is working on a complex class of service. Requests to port out telephone numbers working on the following types of service are considered complex:

- ESSX® / MultiServ®
- Primary Rate ISDN
- Basic Rate ISDN
- Channelized MegaLink®
- PBX - DID, Inward/Outward/Combination trunks
- Pathlink

4.6 Project Managed LNP Orders and Standard Intervals

Note: All targeted intervals are either 2 days or negotiated between the BellSouth Project Manager and the New Service Provider. For additional information on project management and due date intervals, refer to BellSouth® Products and Services Interval Guide Interconnection Services @ http://interconnection.bellsouth.com/guides/guides_html

1. For information on project management and due date intervals, refer to BellSouth® Products and Services Interval Guide Interconnection Services @ http://interconnection.bellsouth.com/guides/guides_html. CLECs should review this guide prior to submitting an LSR.
2. The minimum Due Date for port-out is five business days after the FOC receipt date. The first TN ported in an NPA-NXX is no earlier than five business days after FOC receipt date.

4.7 LNP Order Status

Online Order Status Information For Faxed LSR's

CLEC PON Status Reports for faxed LNP LSRs are now available via BellSouth's website at **https://clec.bellsouth.com**. This report is located in the same location as your company's measurement reports. The information can be found as report number 00 (PON Report) on the CLEC reports page.

The report will provide status for all orders tracked into BellSouth's Local Order Number (LON) systems for the most recent 31 days. The report is CLEC specific. This will answer the majority of questions CLECs have about orders that have been submitted.

Each CLEC will be required to have a specific login and password to access these reports. The application for this report is also found on the web. Once the form is completed, it should be sent to the account team for processing.

EDI/TAG POS and CN

Users submitting LSR's through EDI or TAG receive Pending Order Statuses (POS) and Jeopardy Notifications back through the return path for these systems. Completion Notification (CN) is sent when all service orders associated with the LSR are complete, and all telephone numbers on the PON have been activated by the CLEC.

5. Critical Success Factors for LNP Ordering

5.1 Pre-Order Information

1. CLEC can proactively check the following points in the LSR before submitting via fax, EDI, or TAG.
   a. Customer address is RSAG valid and within the rate center;
   b. NPA-NXX is marked portable in the LERG;
   c. TNs on LSR match TNs on end user account;
   d. Due Date intervals are based on BellSouth Standard Intervals.
2. CLEC must have a Q-account for each OCN registered with NPAC and stated on LSR. All new OCNs registered with NPAC should be updated with BellSouth® and a Q-account should be established.
3. CLEC should use correct OCN. OCN used at NPAC must match OCN used in the CC or NNSP field on CSR and OCN for Q account in BAN field.
4. CLEC must obtain end-user authorization to request LNP before submitting LNP LSR.

5.2 LSR Order Forms for LNP

The following items are applicable to TCIF 7, TCIF 9, and LSOG 4:

1. CLEC should complete all required fields.
2. CLEC should provide previously unassigned PON on LSR.
3. If CLEC is porting on any day other than the Due Date stated on the FOC, the CLEC should send BellSouth® a SUP LSR prior to the Due Date stated on the LSR. BellSouth® will then send a revised FOC with the new due date to the CLEC.
4. For all LNP orders, the LSR must provide the initiator's fax number in the FAX NO field, even for EDI or TAG LSRs.
5. CLEC should provide accurate cable & pair information for loop orders to avoid provisioning delays.

The following are only applicable in the specific environments as noted

- TCIF 7: REF NUM may not be duplicated on an individual PON. **REF NUMs are associated with:**
  - Porting numbers
  - Disconnecting numbers
  - Directory listings

  Example: If a REF NUM is used on the End User Disconnect form, it may not be repeated on the Number Portability/Loop form.

- PONs containing duplicate REF NUMs are placed in clarification.

- TCIF 7: The LSR must contain numbers on one CSR.
- LSOG 4 and TCIF 9: "LEATN" may be used to send multiple CSR's on one LSR.
- TCIF 7 and TCIF 9: The CLEC must advise BellSouth® how to handle additional telephone numbers on the end user account. The additional telephone numbers may be associated with features such as:
  - Ringmaster®
  - Surrogate Client MemoryCall®
  - Flexible Call Forwarding Dial Around

The CLEC must inform BellSouth of numbers to port by submitting an LNA of V on the End User Form.

The CLEC must inform BellSouth of numbers to disconnect by submitting an LNA of D on the End User Form.

5.3 NPAC Communication

1. CLEC must receive FOC from BellSouth® prior to sending any NPAC SV messages (Create or Modify).
2. The CLEC should send the Create SV immediately upon receipt of FOC.
3. The Due Date on the Create SV sent to NPAC by the CLEC must match Due Date on FOC sent by BellSouth®
4. The Due Time on the Create SV must be set to 00:00.
5. CLEC should send Activate SV to NPAC on FOC due date.
6. BellSouth® LCSC does not issue the Disconnect service order until notification of CLEC Activate SV is received from NPAC for all TNs on the LSR. This is done to avoid disruption to end-user service.
7. For any change in the Due Date to port numbers, to cancel port, or to add/remove telephone numbers, a SUP LSR must be sent to BellSouth® LCSC and CLEC must receive revised FOC prior to sending a Modify message to NPAC.

5.4 E911 Lock Down

1. CLEC must send Activate SV to NPAC before BellSouth® LCSC will issue the Disconnect.
2. BellSouth® will not send the Unlock Message until Disconnect service order is complete.
3. If CLEC Migrate message reaches SCC before BellSouth's Unlock Message, the CLEC Migrate message will be shown on an error report which is sent to CLECs daily. CLEC must be sure they have sent Activate SVs to NPAC for all TNs which appear on error reports from SCC.
4. CLEC and BellSouth® should send Migrate and Unlock messages to SCC with the same due date as the Activate SV to NPAC.

5.5 LNP Ordering Checklist

1. **Pre- Submission: The LSR Form for LNP**

Has the pre-order information been validated? CLECs may access pre-order support using a web browser and the LENS interface. Use the Inquiry function to confirm the accuracy of the following information:

- TNs on LSR match TNs on CSR
- LSR address is RSAG valid

2. Have you included/checked the following items:
   - Previously unassigned PON on LSR
   - Unique REF NUMs on all associated forms for LSR
   - Minimum required fields are complete
3. Is there a Q-account for each OCN registered at the NPAC and stated on the LSR in the CC field?
4. Were BellSouth® Standard Due Date Intervals followed when assigning the Desired Due Date? (Refer to BellSouth® Products and Services Interval Guide.)
5. **NPAC Communication**

Do not send NPAC messages (e.g., Create or Modify) prior to receipt of FOC. (For original LSR or SUP LSR)

6. The Create SV should be sent immediately upon receipt of FOC by the CLEC for all TNs on the LSR.
7. Does the Due Date on Create message must match Due Date on FOC sent by BST?
8. For any change in the Due Date to port numbers, a SUP LSR must be sent to BellSouth® LCSC prior to sending a Modify message to NPAC. Any other changes, such as Cancellations, also require a SUP LSR.
9. Does the Due Time have setting of 00:00?
10. **E911 Lockdown**

The Migrate message to lock records at an E911 SCC should be sent after the Activate message is sent to NPAC.

Note: This list is not all inclusive, but highlights the actions which would most contribute to the submission of a valid LSR.

6. System Interfaces

6.1 Interface Options for Order Submission

Ordering Options for LSRs

The CLEC must send the Local Service Request (LSRs) for Local Number Portability or Loop Service with Number Portability to the BellSouth® LCSC for processing. The request may be faxed or sent electronically through Electronic Data Interchange (EDI) or Telecommunication Access Gateway (TAG).

If the LSR is received electronically, the FOC is sent to the CLEC automatically through EDI or TAG. The CLEC also receives completion notices through EDI or TAG once the service orders are complete. EDI, TAG and Fax requests may not be combined on the same PON. If an LSR is originally submitted via EDI, then all SUPS for this PON must be sent through EDI.

6.2 System Interface Descriptions

Local Exchange Navigational System (LENS)

Step	Action
Description:	Front-end GUI application which provides pre-ordering support for LNP orders using the Inquiry function.
Inputs:	Customer address, customer information
Outputs:	RSAG Address Validation; Service availability for a particular NPA NXX; Customer record information

Note: LNP LSRs can not be submitted via LENS.

PON Order Status via the Web

Step	Action
Description:	Supports on-line viewing of faxed LSR order status.
Inputs:	Faxed LSRs
Outputs:	CLEC-specific LSR status by PON

Note: For faxed LSRs

Fax

Step	Action
Description:	Supports the transmission of manual CLEC orders.
Inputs:	Paper LSR
Outputs:	Clarifications, FOCs

Note: Clarifications and FOCs for faxed LSRs are sent via fax. SUP LSRs for faxed LSRs must be submitted via fax. EDI, TAG and faxed requests may not be combined on the same PON.

Electronic Date Interchange (EDI)

Step	Action
Description:	Supports the CLEC transmission of orders to BellSouth®, and the acknowledgment of receipt of orders to CLEC by BellSouth®.
Inputs:	Digital LSR
Outputs:	Clarifications, Rejects, FOCs, Pending Order Statuses, Completion Notices

Telecommunications Access Gateway (TAG)

Step	Action
Description:	Supports the CLEC transmission of orders to BellSouth®, and the acknowledgment of receipt of orders to CLEC by BellSouth®. CLEC has access to ordering and pre-ordering functionality via TAG.
Inputs:	Digital LSR
Outputs:	Clarifications, Rejects, FOCs, Pending Order Statuses, Completion Notices

BellSouth® LNP Gateway

Step	Action
Description:	Supports both internal and external communications with various interfaces and processes, including NPAC (SOA & SMS), EDI, and TAG.
Inputs:	LNP LSRs, NPAC messages, EDI and TAG orders
Outputs:	Rejects, Clarifications, FOCs, NPAC concurrence messages, Service orders to provisioning

NPAC

Step	Action
Description:	NPAC is the third party organization that oversees the porting of telephone numbers for Local Number Portability.
Inputs:	CLEC and BellSouth® subscription versions.
Outputs:	CLEC and BellSouth® subscription versions.

Note: Interface descriptions are specific to LNP orders only.

7. Frequently Asked Questions

7.1 General

1. What should be done if it is determined that some numbers sent on an LSR are not to be ported?

A sup should be sent immediately to delete the telephone numbers from the NP or LSNP form if they are not porting. The account will not be disconnected until all telephone numbers on the NP or LSNP form have been ported.

2. How is a CLEC LSR validated?

The validation process includes the following steps to ensure that the requested number(s) may be ported out.

Step	Action
1	Are the porting number(s) on the LSR working number(s) on the CSR (or customer is paying to reserve the numbers)? If yes, go to step 2. If no, go to step 7.
2	Does the end user name on the LSR match the listed name and/or billing name on the CSR? If yes, go to step 3. If no, go to step 7.
3	Are the telephone number(s) on the LSR associated with a line type that is portable? Refer to Local Number Portability Rules (Section 4.2 of this guide). If yes, go to step 4. If no, go to step 7.
4	Does the service address information on the LSR match the LA or SA on the CSR? If yes, go to step 6. If no, go to step 5. **Note:** If the line type on the existing end user service is FX/FCO, go to step 5.
5	Is the Toll Message Rate Center (TMRC) for the porting number(s) shown on the LSR the same as the TMRC for the address shown on the LSR? If yes, go to step 6. If no, go to step 7.
6	Is LNP available for the NPA NXX at this time? If yes, go to step 8. If no, go to step 7.
7	Send CLEC Clarification request and wait for receipt of SUP LSR.
8	Proceed with Service Order Issuance Process.

3. What CLEC actions would cause an LNP request to fall out of the order process at Bell-South?

Some reasons for an LSR to fall out of the order process are:

- CLEC sent a create SV before receiving an FOC. BellSouth will put SV in Conflict with NPAC
- CLEC sent a create on the wrong TN
- CLEC sent create with due date different than FOC due date
- CLEC sent create with time other than 00:00

- CLEC ported number before or after Due Date on the FOCIf the CLEC LSR has fallen out of the order process, BellSouth® will not be able to automatically send Concur SV to the CLEC Create SV.

4. What CLEC actions should be taken if the end user is continuing to receive a bill from BST after the account is ported out?

CLEC should verify that the activate SV has been sent on all telephone numbers provided on the LSR. If yes, refer the account to the LCSC for investigation. If no, send the activate SV to the NPAC.

7.2 Ordering Options

1. In what form should a CLEC expect to receive FOC, Clarification, or Reject response?
   - If an order was sent via EDI, the response will be sent via EDI.
   - If an order was send via TAG, the response will be sent via TAG
   - If an order was send via fax, the response will be sent via fax.
2. Why can't the status of an LSR submitted via EDI be viewed in the PON Status Reports which are available on-line?

The PON Status Reports are for orders which were submitted via fax. Status for orders submitted via EDI/TAG are received via EDI/TAG.

7.3 LSR Error Notices

1. What types of errors would require clarification?

Some examples of errors for which BellSouth® will request clarification:

- Some numbers on an account are being ported, but information/instruction has not been provided on **ALL** numbers listed on the account (i.e., Ringmaster®; Surrogate Client MemoryCall®; Flexible Call Forwarding Dial Around (FCPAN))
- REF NUM are duplicated on the LSR
- LSR does not contain the minimum required fields
- Duplicate PON
- Data was entered into a prohibited field
- Busy cable & pair
- Incorrect address
- End user & central office are not in same wire center (may be wrong ACTL)
- Invalid ACT
- Invalid Q-account

- TN listed is not a working BellSouth® TN
- Listing 2 numbers to port from two different CSRs on one LSR

2. Why would the CLEC receive error reports from SCC, Manager of the E911 database?

If the CLEC sends the Migrate message to the SCC to lock E911 prior to SCC receiving BellSouth's Unlock message, the CLEC Migrate message will be placed on an error report (755) which is distributed daily to CLECs from SCC. SCC will mechanically process the Migrate/Unlock record match for 7 days for all 755 error messages. After 7 days the record will move to a 760 error file. SCC will manually continue to look for the record match there.

CLEC should be sure that the Activate SV has been sent to NPAC for the Migrate messages which appear on the 755 or 760 error reports.

7.4 Due Dates

1. What are the key steps to changing the Due Date for a previously submitted LNP LSR?

The most important part of a Due Date change is submitting a SUP LSR to the BellSouth® LCSC and receipt of a revised FOC prior to sending the Modify SV to NPAC. If the Modify SV is sent to NPAC prior to receipt of the revised FOC from BellSouth, the LSR will fall out of the order process at BellSouth®. Due Date changes should be requested prior to the due date and not later than the due date originally stated.

2. Why does the FOC have a Due Date which is different than the Desired Due Date?

If the Desired Due Date on the original LSR did not adhere to BellSouth® Standard Intervals for LNP orders, then the Due Date on the FOC would reflect the appropriate interval. Refer to BellSouth® Standard Interval Guide for more details.

3. Why does the CLEC have to send the Activate SV on the Due Date?

If the CLEC sends the Activate SV before or after the Due Date on the FOC, end user service could be impacted.

7.5 NPAC Communication

1. What does it mean when a CLEC receives an SV with Authorization set to NO (Conflict) from NPAC?

This SV indicates that the CLEC sent a Create SV to NPAC prior to receipt of an FOC for the TN. CLEC should check for receipt of an FOC for the TN.

2. Why can't the CLEC send the Create SV to NPAC prior to receiving an FOC from BellSouth®?

If the CLEC sends the Create SV to NPAC prior to receiving an FOC from BellSouth®, BellSouth® will send SV with Authorization set to NO (Conflict) to NPAC. CLEC should follow industry flow for successful porting.

3. How does CLEC know BellSouth® is ready to port number?

CLEC should complete the following steps at least the day before the due date:

- Verify FOC was received
- Verify FOC due date
- Verify SV is Pending with Concurrence for all TNs on LSR

- Verify SV due date is same as FOC due date for all TNs on LSR

4. What happens if the NPAC telephone number disconnect option is used after sending the activate (number ported) message?

The telephone number and not the end user is returned to BellSouth®. The CLEC must arrange to provide service for the end user because upon receipt of the Activate SV, BST will proceed with the disconnect order.

Note: With the implementation of Number Pooling, the Telephone Number Disconnect function will return the telephone number to the code owner for the NPA NXX -T000. If the number block has been donated but not allocated, the telephone is returned to the Block Administration Center. If the number block has been allocated, the telephone number is returned to the LEC that owns the block.

8. Glossary of LNP Terms

8.1 Glossary of LNP Terms

TERM	DEFINITION
Advanced Intelligent Network (AIN)	Evolving, service-independent network architecture that provides important new capabilities for rapid creation of customized telecommunications services. AIN offers one way for a network element to query a central database to obtain local number portability routing information.
BST	Acronym used to indicate BellSouth®
Central Office (CO)	An environmentally controlled space in which a telecommunications network switching system and other associated operating systems are installed.
Central Office Exchange (CENTREX)	A telephone service offered by LSPs that provides the end-user with advanced features and services from the LSPs EO
Clarification	Requested by BellSouth LCSC when an CLEC LSR contains incomplete or inaccurate information which requires further documentation from the CLEC to allow order processing to continue.
Competitive Local Exchange Carrier (CLEC)	A new entrant into a market where there is already an incumbent LEC (ILEC) providing local phone service.
Conflict	An SV status which indicates that an error has occurred in the ordering process which will require further CLEC action for BellSouth to resume order processing. For example, BST will place SV in conflict if CLEC sends a Create SV before an FOC has been issued.
Directory Number (DN)	An end-user's telephone number, also known as a TN. In its most restrictive definition, an end-user number which is listed in a directory or with directory assistance.
Donor Switch	Switch/Office/Exchange Refers to the local switch from which an end-user was served, prior to changing SPs.
End Office (EO)	A switching system used to provide local service for a local telephone company; also known as a central office. End offices are typically equipped with both line and trunk terminations.

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Fall-Out	Human eyes are needed to review the order, e.g. with a partial migration.
Fatal Reject	A type of error which suggests that the minimal requirements of an LSR were not fulfilled. For example, a missing required field or a duplicate PON. A Fatal Reject will not allow the CLEC order to be processed further by the BellSouth® LCSC.
Federal Communications Commission (FCC)	Congressionally credited governmental agency with the responsibility to direct the U.S. national and international telecommunications regulatory environment.
Firm Order Confirmation (FOC)	Verification/acknowledgment from one SP to another of receipt of a valid Local Service Request (LSR)
Incumbent Local Exchange Carrier (ILEC)	Typically, the RBOC or independent who services local end-users (prior to a market opening up to local competition)
Intelligent Network (IN)	Hardware and software platform used to provide enhanced voice, video and data services. IN offers one way for a network element to query a central database to obtain local number portability routing information.
Inter-Exchange Carrier (IXC)	A carrier that provides connections between LATAs, between serving areas, and between LATAs and serving areas where the calling or called end-user is located in the United States.
Interim Number Portability (INP)	A temporary solution for porting telephone numbers that routes calls to the CLEC wire center using: - Remote Call Forwarding (RCF) - Direct Inward Dialing (DID) - Route Index Hubbing (RTI)
Local Exchange Carrier (LEC)	A company that provides local telephone service. LECs also include independent local telephone companies.
Local Exchange Routing Guide (LERG)	Bellcore administered Network Routing and V&H Coordinate information for U.S. Telecommunications Industry and others.
Local Number Portability (LNP)	Provides end users with the ability to retain their numbers when they change their local service provider.

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Local Number Portability Gateway (LNP-GW)	A BellSouth® System created to support LNP that: - includes desktop application for LCSC Service Representatives. - is used to process LNP LSR's on-line. - communicates with the NPAC. - interfaces with the AIN database to update call routing information.
Local Service Management System (LSMS)	The LSP owned network database which holds downloaded ported number information.
Local Service Provider (LSP)	A company that provides basic local telephone service.
Location Routing Number (LRN)	A routing code that is: - unique - 10 digits - identifies the switch in which a ported number resides. LRN utilizes AIN triggers, SS7 signaling, and unique 10-digit code for switch identification.
Lockheed-Martin IMS (LM-IMS)	The neutral third-party administrator for the LNP database NPAC.
New Service Provider (NSP)	Subscribers selection of exchange carrier that will be providing dial tone. This will usually be the exchange carrier that is not the default SP for the NPA NXX. This would be the recipient switch for the porting of a number when the end-user is being ported. When the end-user is changing from ported to non-ported the NSP would be the donor switch.
Non-Portable Number	Numbers are those that have not been designated as ported exchanges or portable capabilities in the LERG.
North American Numbering Council (NANC)	FCC -mandated task force assigned to oversee NPAC and NANP administration for the U.S. telecommunications industry.
North American Numbering Plan (NANP)	A plan for the allocation of unique 10 digit address numbers. The numbers consist of a 3 digit area (numbering plan area) code, a 3 digit office code, and a 4 digit line number. The plan also extends to format variations (e.g., 3 digit and 7 digit address), prefixes (e.g., 1, 0, 01 and 011), and special code applications (e.g., Service Access Codes).

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Number Portability Administration Center (NPAC)	A neutral third party vendor contracted by BellSouth® and the CLEC's to: - maintain the master database for LNP. - coordinate the flow of information between service providers.
Numbering Plan Area (NPA)	A defined geographic area identified by a unique three digit code used in the North American Numbering Plan Area.
NXX	End Office Code A three digit code used to identify a central office exchange. However, in a portable environment the last 4 digits or the 7-digit telephone number may not always reside in the central office exchange to which the NXX was natively assigned.
Plain Old Telephone Service (POTS)	Basic residence or business telephone service which provides users with simple telephone features or service.
Port In	A term used with Local Number Portability to indicate that a customer is changing his facility based local service provider from a CLEC to BellSouth and wishes to keep his same telephone number.
Port Out	A term used with Local Number Portability to indicate that a BellSouth customer is taking his telephone number with him to another facility based local service provider.
Portability	The ability of the user to change local telephone companies, location and/or service without changing the telephone number.
Portable Number	Those numbers within an exchange that have portable capabilities and are assigned to a designated portable exchange. These are the numbers that are assigned to the designated default switch and have not been ported to another LSP. These numbers are commonly identified as working on the "Donor" switch. Portable numbers are all numbers in an NXX where portability is allowed. Numbers will be declared portable on an NXX basis.

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Ported Number	Those that have been assigned to other LSPs providing recipient switch access for Portable exchanges. This is commonly termed as the numbers assigned to the "Recipient" switches. The "Recipient" switch is not the default switch in the SCP. Ported numbers are the subset of portable numbers that have actually been moved from the LERG based switch (donor) to another switch (recipient).
Private Branch Exchange (PBX)	System typically installed in a business that serves as the central telephone system for that business and which may provide certain enhanced services for that business.
Recipient Switch	Switch/Office/Exchange — Refers to local end office switch to which an end-user is served, after changing SPs.
Remote Call Forwarding (RCF)	LNP deployment model generally viewed as an interim solution. For customers changing their local telephone company and wanting to keep their phone number, routes all incoming calls to the old company switch first. Then the calls are forwarded to a new phone
SCC	Neutral third party responsible for the E911 database administration. (SCC is not an abbreviation.)
Service Management System (SMS)	Computer facility permitting access to records contained in the number portability database. Receives Number Ported messages from NPAC.
Service Order Administration (SOA)	Interface to the NPAC for porting end-user TNs. Receives create and sends concurrence SVs.
Service Provider (SP)	A company that provides telephone service.
Subscription Version (SV)	A message that flows through the NPAC to provide information regarding LNP.
Telecommunications Access Gateway (TAG)	TAG is a transaction based messaging system with data translation. TAG provides a by-directional flow of information between the CLEC and BellSouth®, and gives the CLEC access to pre-ordering and ordering functionality.

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Toll Message Rate Center (TMRC)	A uniquely defined geographic area: - created to allow for the proper rating of toll and message charges. - appears in LERG for a wire center/switch.
Trigger Order	6-Digit Trigger – identifies NPA XXX that is portable and causes querying. 10-Digit Trigger – end-users' telephone number. This trigger causes look up process so when the 10-digit trigger is dialed the call is routed through AIN to the SS7 database. **Note:** "Trigger" is not available for all service types.

9. Appendix

9.1 References

Information resources reviewed for this guide include, but are not limited to:

- BellSouth® Business Rules for Local Ordering
- BellSouth® CLEC Interconnection Web Site
- BellSouth® LNP Documentation
- North American Numbering Council (NANC) Architecture and Administrative Plan for Local Number Portability
- North American Numbering Council (NANC) Inter-Service Provider LNP Operations Flows
- www.fcc.gov
- www.npac.com/home.htm
- www.ported.com