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July 20, 2001

BY HAND DELIVERY

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31 JUL 20 PM 4:16
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Re: Docket No. 960786-TL & 981834-TP
OSS Third Party Test

Dear Ms. Bayó:

Enclosed for filing on behalf of WorldCom, Inc. and its operating subsidiaries in regard to the OSS Third Party Test are the original and fifteen copies of a Notice of Filing Affidavits Regarding OSS Problems, together with the accompanying affidavits of Sherry Lichtenberg.

By copy of this letter, these documents have been furnished to the parties on the attached service list. If you have any questions regarding this filing, please call.

Very truly yours,

Richard D. Melson

RDM/mee
Enclosures
cc: Certificate of Service
Lisa Harvey
KPMG

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996.)))))) _____))	Docket No. 960786-TL
In re: Petition of Competitive Carriers for Commission action in support of local competition in BellSouth Telecommunications, Inc.'s service territory.))))) _____))	Docket No. 981834-TP Filed: July 20, 2001

**NOTICE OF FILING AFFIDAVITS
REGARDING OSS PROBLEMS**

MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (collectively, "WorldCom") hereby give notice that they are filing as attachments hereto Affidavits of Sherry Lichtenberg dated May 29, 2001 and July 5, 2001. These Affidavits were submitted to the Georgia Public Service Commission as part of its 271 proceeding in Docket 6863-U. As in the Affidavits, the division of the company that offers local residential service will be referred to as "MCI."

These Affidavits detail (a) problems that MCI is experiencing with BellSouth's Operations Support Systems (OSS) during the initial stages of MCI's launch of residential service in Georgia, and (b) problems that MCI is experiencing region-wide with BellSouth's implementation of its Change Control Process.

Problems with BellSouth's OSS include a high number of customers who lose dial tone (sometimes for extended periods) shortly after being migrated to MCI, large numbers of

electronic orders being processed manually, missing firm order confirmations and completion notices, a high reject rate for orders, unexplained changes by BellSouth in MCI's requested due dates, degradation in response times from TAG, and delayed updates to BellSouth's billing systems for customers who have migrated to MCI. The problems with BellSouth's Change Control Process center on delays in accepting CLEC submitted changes, delays in prioritizing those changes for implementation, and delays in implementing changes which have been assigned high priorities. Collectively, these problems demonstrate that BellSouth is not providing nondiscriminatory access to its OSS and that BellSouth's Change Control Process is not performing satisfactorily.

WorldCom ordinarily would have submitted the information contained in these affidavits as prefiled testimony in the BellSouth 271 docket (Docket No. 960786-TL). The Commission has ruled, however, that the adequacy of BellSouth's OSS will not be considered during the formal hearings in that docket, but instead will be considered solely via KPMG's Third Party Test and a workshop process following the submission of KPMG's final report. The Commission made it clear that ALECs would be permitted

to file their own data at any time. Any such information submitted in the OSS testing phase will be considered and addressed by KPMG, as with any of the ALEC comments.

* * *

We note that WorldCom is not precluded from submitting this information [commercial data from roll out of local service using UNE-P in Georgia] in the third-party testing phase of this proceeding.

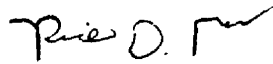
Order No. PSC-01-1252-FOF-TL, pages 13, 14.

The Affidavits are being filed at this time in the Third Party OSS Test dockets in order to alert the Commission, the Commission staff, and KPMG to serious problems that WorldCom is experiencing with systems and processes that are being evaluated in the Third Party Test.

WorldCom intends to provide updated affidavits regarding its experience with BellSouth's OSS in Georgia prior to the Commission's workshop on OSS issues. WorldCom's commercial experience in Georgia provides important data that should be evaluated by KPMG as part of the Third Party Test process. This experience is relevant to the Commission's ultimate decision on BellSouth's compliance with the requirements of Section 271, because BellSouth's OSS for Florida and Georgia are identical. Unless the underlying OSS are corrected, problems experienced with handling commercial volumes of traffic in Georgia are likely to be experienced when WorldCom attempts to enter the Florida market on a large scale. Similarly, lengthy delays in BellSouth's consideration and implementation of OSS changes requested by CLECs through the Change Control Process affect WorldCom's ability to provide service on a commercial basis in all states in the BellSouth region, including Florida.

RESPECTFULLY SUBMITTED this 20th day of July, 2001.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by hand delivery (*) or by U.S. Mail to the following parties this 20th day of July, 2001.

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Attorney

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In re:

Consideration Of BellSouth Telecommunications,)
Inc.'s Entry Into InterLATA Services)
Pursuant To Section 271 Of The)
Telecommunications Act Of 1996)

Docket No. 6863-U

AFFIDAVIT OF SHERRY LICHTENBERG

The undersigned, first being duly sworn, states that:

1. My name is Sherry Lichtenberg. My business address is 701 S. 12th St., Arlington, Virginia 22202. I am employed by WorldCom, Inc. in the Mass Markets local services team as a Senior Manager. I will refer to the division of the company that offers local residential service as "MCI." My duties include designing, managing, and implementing MCI's local telecommunications services to residential customers on a mass market basis nationwide, including Operations Support Systems ("OSS") testing. I have nineteen years experience in the telecommunications market, four years with MCI and fifteen years with AT&T. Prior to joining MCI, I was Pricing and Proposals Director for AT&T Government Markets, Executive Assistant to the President, and Staff Director for AT&T Government Markets and had a number of positions in Product and Project Management.
2. MCI has recently begun its launch of local telephone service to residential customers in Georgia using UNE-P. MCI did so based on plans that have been in place for well more than six months. MCI decided to attempt to enter the Georgia market using UNE-P because this Commission made that entry vehicle available and has generally been committed to forcing BellSouth to remove barriers to local entry. The scope and viability

of our entry have always been contingent on BellSouth correcting flaws that are discovered in its OSS and proving that it can handle commercial volumes of orders.

3. MCI began submitting its initial UNE-P customer orders via EDI OSS >> in early May and then launched service on May 15. MCI had transmitted approximately 3400 orders through May 25 and will increase order volumes as customers become aware of our new offerings. Despite the relatively low volume of orders being sent each day, we are already beginning to encounter significant problems that will impede if not stymie our ramp up to full commercial volumes if they are not corrected.
4. Defects in BellSouth's systems that have surfaced thus far include the following: (1) excessive manual handling that has lead to more then 300 incorrectly rejected orders; (2) improper branding of OS/DA services that is confusing (to say the least) to consumers, and, in some cases, lack of DA branding; (3) failure to provide a list of remote call forwarding access numbers that MCI can incorporate into its systems; (4) in at least two cases, customers' loss of dial tone during migration; and (5) orders being rejected because of local "PIC freezes." Unfortunately, our experience in other states has been that new problems have arisen as order volumes increase and manual processes prove insufficient to the task of processing thousands of orders per week. That so many significant problems have manifested themselves at low order volumes is therefore troubling.
5. In determining the extent to which MCI will be able to transmit full commercial volumes of orders, MCI will evaluate the degree to which it continues to have operational problems due to BellSouth's OSS and other deficiencies, as well as the likelihood of future problems with increased volumes. In particular, MCI will evaluate the extent to

which BellSouth continues to rely on extensive manual processing on its side of the interfaces.

6. MCI believes that all of these problems can be corrected and hopes they are corrected so that it can ramp up to full commercial volumes. A full-scale entry in the Georgia residential market is an important part of MCI's business plans. Whether MCI is able to do so, however, depends on the extent to which BellSouth makes further progress. From our experience thus far it appears that BellSouth's OSS is not yet operationally ready to accept commercial volumes of UNE-P orders.

A. BellSouth Appears to Employ Excessive Manual Handling of Orders

7. Of the some 3400 orders sent during MCI's Georgia launch through May 25, approximately 365 were rejected in error by BellSouth's service representatives. These orders fell out of the BellSouth automated processing stream for reasons that are still unclear, but appear to include unannounced, sporadic shutdowns of the BellSouth back end systems.
8. Once the orders fell out of the automated process, the BellSouth representatives rejected them for one of two (incorrect) reasons. First, about 50 orders fell out because BellSouth's representatives failed to recognize that they represented a proper UNE-P transaction type. Second, about 250 orders were incorrectly rejected because the product (or "USOC") code "UEPLX" was not on the order. This code is added automatically by BellSouth's systems when an order "flows through" them, but must be added by a BellSouth account representative if the order falls to manual. Unfortunately, rather than adding this code, BellSouth's representatives simply rejected the orders back to MCI in

error, requiring costly research and re-work. About 65 additional orders fell out for both of the reasons listed above.

9. MCI's BellSouth account team has acknowledged that these orders should not have fallen out for manual processing, nor should they have been rejected. The rejections took place because BellSouth representatives at the Local Carrier Service Center had not been trained to process them correctly. Although BellSouth agreed to reprocess these specific orders and has begun working an initial list of 298 rejected orders provided by MCI, no root cause analysis for the fallout has been provided. The initial problem of incorrect manual rejects appears to have stopped as of May 23, but MCI is continuing to monitor the situation. MCI remains concerned that such a high level of manual processing apparently is being used and that such manual processing will lead to more problems as order volumes increase.

B. BellSouth's OS/DA Service Appears to Have Major Flaws

10. Prior to launching local residential service in Georgia, MCI requested BellSouth to provide Originating Line Number Screening (OLNS), by which BellSouth provides OS/DA service to CLECs, with CLEC branding and without the need for dedicated trunking. BellSouth provisioned OLNS on May 11, in time for launch, but unfortunately there have been significant problems with the service. For example, customers have reported that when they press 0 to make a collect call, they hear the following message:

MCI . . .
To place a call press 1
For BellSouth Residential service, Press 2
For BellSouth Business service, Press 3
For additional assistance, Press 0.

This message obviously fails to brand the service as "MCI" in a meaningful way and also provides BellSouth with an immediate win-back opportunity. If a customer presses 2, he

will be connected with the BellSouth business office, which cannot resolve problems with MCI service. Other customers have not received branding at all for their calls to directory assistance (411). MCI is in the early stages of attempting to work out these problems with BellSouth.

C. BellSouth Refuses to Provide a List of Remote Call Forwarding Access Numbers

11. To establish the "forward to" number for remote access to call forwarding, the customer must dial a special access number ("SAN"). SANs typically are assigned based on the customer's NPA/NXX or central office. In every other state where MCI has launched residential local service, the Bell Operating Company has provided a list of SANs at launch so that MCI can assign the appropriate SAN to each customer.
12. MCI needs to be able to provide the SAN to a customer choosing remote call forwarding at the time of sale, in the subsequent fulfillment letter sent to the customer, and later if the customer forgets the SAN and calls in to request it. The BellSouth account team has stated that BellSouth representatives can make an electronic inquiry to determine a customer's SAN via an electronic system we cannot use. Because MCI does not have access to BellSouth's electronic system, we must obtain SAN information another way. We find it difficult to believe that BellSouth does not have, or could not easily compile, a list of SANs organized by NPA/NXX or central office (or in some other manner), particularly given that other Bell companies (including Verizon, SWBT and Ameritech) have been able to do so. BellSouth's account team stated by letter dated May 30, 2001 that it will not provide a list of SANs because they "are subject to change as expanded capabilities and processes are implemented to support this feature option." This excuse is

unacceptable. BellSouth should provide the list of SANs and then update the list for MCI as BellSouth updates the list for itself.

13. Alternatives suggested by the BellSouth account team do not meet the needs of our customers. The account team has stated that MCI can obtain the SANs after an order has been provisioned by looking up the number in CSOTS. Using that approach, we would not be able to provide the customer's SAN at the time of sale and perhaps not until several days after the sale. Using CSOTS also is problematic because CSOTS does not store the information for a customer longer than a year, so MCI would not be able to obtain SANs from CSOTS for a customer who calls for his SAN a year after his or her service has been provisioned. Even more importantly, we expect to be placing thousands of orders per week with BellSouth, and expect that many of our customers will want the remote call forwarding feature. Requiring us to do a manual look-up for each customer ordering remote call forwarding would not be a practical way of obtaining SANs.
14. The account team also has discussed providing SANs via the firm order confirmations BellSouth returns for each order. That approach would not solve our problem either. In the first place, currently BellSouth only includes SANs on manual, not electronic FOCs. Because our launch is underway, we cannot wait for BellSouth to change its FOC process to address this urgent problem. Moreover, even if SANs could be included in electronic FOCs soon, we still would not be able to provide the SAN to the customer at the point of sale, which we should be able to do. And a change of this type to the EDI FOC transmission would require re-coding and testing of the interface systems, not a trivial matter.
15. More recently, the BellSouth account team has stated that we can obtain SANs via LENS, and that by using LENS we could obtain the SANs at the time of sale. But this approach

also is not practical when thousands of orders per week are being submitted directly to BellSouth via EDI. MCI representatives processing requests for remote call forwarding would have to issue the customer order via EDI, then dial into LENS (a proprietary system not suited for the thousands of orders a CLEC in full commercial production will issue daily) and then submit a valid address and telephone number before we could obtain the SAN. That method of obtaining the SAN would be far too time-consuming for use in our Georgia launch and would defeat the purpose of developing fully automated pre-ordering, ordering, and provisioning systems. The bottom line is that the only satisfactory way to resolve this issue is by providing a list SANs to MCI so we can establish our own database that we can query to meet our customers' needs.

16. The BellSouth account team has stated that if MCI wants a list of SANs, it will have to submit that request to the change control process. There is absolutely no reason that a request for a list of numbers should be treated as a change to BellSouth's OSS. As MCI's residential launch progresses, there are likely to be a number of issues that our companies will need to work through. As a matter of process, we should not be required to go to the change control process every time we need to resolve one of those issues. That approach would create needless delays and would impair our ability to enter the Georgia residential market. The resolution of every issue does not require a change to BellSouth's OSS. The SAN list is a good example. BellSouth should simply provide the list without further delay.

D. MCI Customers Have Lost Dial Tone During Migration

17. Thus far, two customers have lost dial tone when they were being migrated from BellSouth to WorldCom. In both cases, BellSouth's trouble handling organization stated

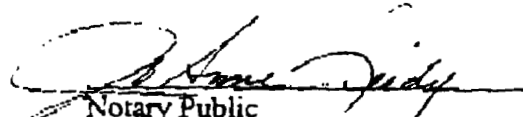
that the customer's loop had somehow become disconnected at the main distribution frame. Of course, a customer losing dial tone is always of major concern. In this case, the loss of dial tone is particularly troubling because there is no reason for BellSouth to make any physical change to the facilities serving a UNE-P customer when the customer is being migrated to MCI. It is too early to tell whether these occurrences reflect isolated incidents or evidence of a process flaw that will result in additional problems. We will keep BellSouth and the Commission informed if these incidents develop into a pattern of disrupted service.

E. MCI Orders Have Been Rejected Because of Local PIC Freezes

18. MCI has had four orders rejected because of local PIC freezes. After MCI submitted the orders, it received rejections with the message "UNABLE TO HANDLE REQUEST: ENDUSER ACCOUNT FROZEN." Thus, it appears BellSouth has provided a local PIC freeze option in Georgia that can require CLECs to clear additional hurdles before a customer's service is migrated. The BellSouth account team has told us that a customer with a local account freeze must call BellSouth's business office to have the freeze lifted. Moreover, BellSouth has stated that these calls must take place during regular business hours rather than during the hours when MCI is actually selling its local service. To my knowledge, BellSouth is not authorized to provide local PIC freezes in Georgia. MCI has notified BellSouth of this problem and is awaiting a response.


Sherry Lichtenberg

Sworn to and subscribed before me
this 29th day of May, 2001.


Notary Public

My Commission expires: 3/31/02

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In re:

Consideration Of BellSouth Telecommunications,)
Inc.'s Entry Into InterLATA Services)
Pursuant To Section 271 Of The)
Telecommunications Act Of 1996)
_____)

Docket No. 6863-U

AFFIDAVIT OF SHERRY LICHTENBERG

The undersigned, first being duly sworn, states that:

1. My name is Sherry Lichtenberg. My business address is 701 S. 12th St., Arlington, Virginia 22202. I am the same Sherry Lichtenberg who filed an affidavit in this docket on behalf of WorldCom, Inc. on May 31, 2001. As in my initial affidavit, I will refer to the division of the company that offers local residential service as "MCI."

2. One purpose of my testimony is to update the Commission on the launch of MCI's local residential service in Georgia. As I will discuss, we continue to experience significant problems that demonstrate that BellSouth needs to make corrections to its OSS before it can accommodate commercial volumes of orders. I also will discuss BellSouth's change management, or change control, process. As a result of the continuous evolution of the telecommunications industry, the interfaces and processes by which CLECs interact with BellSouth must change as well. Change management is the process by which CLECs and BellSouth determine which changes are needed, and then implement those changes in such a manner that they do not have significant negative impacts on CLECs. For example, a good

change management process will ensure that CLECs have sufficient notification of changes to an interface that they are able to adapt to any such change.

3. I am responding to the Affidavit of William N. Stacy.

GEORGIA LAUNCH

4. In my initial affidavit, I noted that MCI launched its local residential service in Georgia on May 15. Although our launch is still in its early stages, we have more experience now than when my first affidavit was filed on May 31. To date, we have turned up more than 10,000 local residential customers in Georgia and we are striving to build on that number. Unfortunately, a number of problems continue to impede our progress and threaten the prospect of attaining commercial volumes of orders. As I discuss below, a couple of problems I noted in my first affidavit have been resolved, but other key problems persist and yet other new problems have come to the surface. We continue to be hopeful that these problems can be resolved, and we are doing our best to work with BellSouth to fix them. Until we can work them out, however, BellSouth cannot be said to be providing nondiscriminatory access to its Operations Support Systems ("OSS").

5. Two of the issues I raised in my initial affidavit appear to have been resolved. BellSouth appears to have remedied the problem we experienced early on with OS/DA branding and BellSouth has explained where we may obtain the special access numbers we were requesting. Unfortunately, other problems have not proved as easy to fix.

6. The biggest problem we are facing right now is customers who are losing dial tone. Through July 2, 2001, we have had 188 customers lose dial tone (or in some cases, the inability to receive calls) shortly after being migrated to us. When I filed my initial affidavit, we

had noted only two customers who had lost dial tone, so this problem has grown much worse than it initially appeared. Our customers have been losing dial tone for up to 48 hours -- some of them even longer -- a major customer impact. In each case, the customer who lost dial tone had working phone service before being migrated to MCI. So far the explanations we have received for these disconnections suggest that the cause of the problems concern faulty facilities, problems with customers' telephones and the like. There should be no physical work that goes into migrating a BellSouth customer to an MCI UNE-P line, so it makes no sense that so many customers would be losing dial tone after being migrated to us just as a matter of random chance. There appears to be a very serious problem with BellSouth's ordering and provisioning process that needs to be fixed because such large numbers of customers are being affected. If this problem is not fixed immediately, it will seriously harm our ability to compete in the local residential market.

7. The BellSouth account team has stated that the problem could be the result of a conflict between the disconnect ("D") and the new ("N") service orders generated by the BellSouth backend systems. The account teams stated that such errors are identified with a cause code of 510 on trouble ticket responses. We checked the trouble ticket responses, however, and they do not include the cause and disposition codes used by BellSouth. When MCI's technical support staff requested the cause code for the trouble tickets submitted for the loss of dial tone problem, BellSouth's CWINS center stated that it would not provide this information. The ILECs for the other local residential markets MCI has entered provide this information upon request and MCI is at a loss to understand why BellSouth will not provide it. Although these codes have been provided after BellSouth account team research on specific PONs, we need this information on each trouble ticket at the time it is closed.

8. Most importantly, to reduce loss of dial tone BellSouth must reduce its level of manual handling to ensure that the RRSO code and sequence information are added to every order. BellSouth has testified in other proceedings that a single order process is under development. This process must be in place before BellSouth can be said to be providing parity service.

9. A second problem noted in my initial affidavit that has not been fixed concerns manual handling of electronic orders. BellSouth continues to handle far too many orders manually, introducing errors and slowing the migration process. From our experience in the five other states we have entered, we understand that the two acceptable reasons for manual handling are (i) two orders against the same telephone number existing in the system at the same time (for example, a pending order on the ILEC to add a feature followed immediately by an order to migrate the customer), and (ii) a conflict in features ordered (for example, an order for call waiting and caller ID with call waiting at the same time). These orders must fall to manual so that the ILEC service representative can determine the proper actions to take. BellSouth, however, appears to process additional order types manually. For example, BellSouth has begun to clarify orders with the note "CLR TEL NO LCON FORMATTED INCORRECTLY," yet MCI has sent the name and telephone number that appears on the customer service record ("CSR"), which suggests that BellSouth has processed the LSR manually for some reason. Through June 29, there had been 104 rejects for this reason. The following orders have been routed to the account team for research:

S003356868BSGAPR
S003357316BSGAPR
S003358130BSGAPR
S003352928BSGAPR
S003353248BSGAPR

S003352883BSGAPR
S003352889BSGAPR
S003352897BSGAPR

10. MCI also has received clarifications for “assignable order” and for “required USOC missing.” These clarifications do not provide the information necessary to correct the order and appear to be mistaken explanations resulting from manual processing. To make matters worse, unless a CLEC responds to a manual clarification within ten days, BellSouth will cancel the order and charge the CLEC for doing so. Clarifications that provide vague or incorrect explanations of the reason for rejection can make this deadline difficult to comply with and make it difficult for MCI to migrate customers on their required due date. Other ILECs give a thirty day deadline and allow for extensions, which makes this problem more manageable.

11. Many LSRs continue to fall out for manual processing, and we are continuing to see these orders being rejected for reasons we know to be incorrect and that appear to us to be incorrect. Through June 29, MCI identified 572 invalid “clarifications.” MCI remains concerned that such a high level of manual processing apparently is being used and that such manual processing will lead to more problems as order volumes increase.

12. Additional defects in BellSouth’s systems that have surfaced include the following: (1) missing firm order confirmations and completion notices; (2) high rejection rates; (3) changed due dates; (4) long TAG pre-ordering response times; and (5) billing system problems that lead to double billing, delay in OS/DA branding and maintenance and repair problems. I will discuss each issue briefly.

13. MCI has begun to experience a problem with missing firm order confirmations and completion notifications. While this problem is still a small one at the early stages of our launch, our experience in other states is that even a small missing notifier problem at this stage is

often an indication of system problems that will escalate as volumes climb. MCI has opened trouble tickets with BellSouth for this problem and has requested the EDI tracking numbers (ISA/GS numbers) so that we may do internal research on this problem. BellSouth has not yet agreed to provide us with these tracking numbers, making it impossible to do research on our side.

14. Of the LSRs we submitted in June, we have had a reject rate of about 25%. About twenty-two percent of those rejects are address rejects that occur because of BellSouth's requirement that we provide a complete service address for every customer, even though the customers are simply changing the ownership of their accounts from BellSouth to MCI so that no installation is required. The other Bell companies deal with his problem by only requiring customer name and telephone number for a migration order. We have requested in the change management process that BellSouth do the same, but implementation has been postponed indefinitely.

15. BellSouth appears to be changing MCI's requested due date on a number of MCI's migration orders. For example, on June 8, MCI sent PON S003178025BSGAPR1 to BellSouth requesting a due date of June 12. This due date was well within the BellSouth specified interval for a migration as specified residential, non-dispatch order. MCI received a FOC with a due date of June 15. MCI provided a list of fifteen examples to BellSouth for research the reason for this change of due date. Changed due dates such as this postpone completion of the customer's order and result in customer dissatisfaction.

16. MCI has begun to see a problem with slow or downgraded responses from BellSouth's TAG pre-ordering system. MCI has created an application-to-application interface with TAG that allows MCI to perform a service address validation and obtain the customer's

service record. These two transactions are necessary because BellSouth requires a complete service address for a customer to migrate from BellSouth to MCI, even though nothing about the customer's address or service location is changing. MCI has experienced slowdowns and outages of TAG on numerous occasions. MCI opened trouble tickets for this issue on June 4, 5, 14, 28 and 29. All tickets have been closed, but the underlying problem apparently has not been fixed. BellSouth has told MCI information technology personnel that TAG was not capable of handling the transaction load that it was receiving. This problem, too, is under discussion. When we cannot access these two transactions, we risk sending an incomplete or invalid service address and having the order rejected. Address rejects are climbing.

17. When this problem was brought to BellSouth's attention, BellSouth told us that we are requesting too many CSRs and validating too many addresses, and that the system was not built for the stress our commercial entry is placing on it. Again, we are just getting started and expect to increase volumes substantially over the coming months. We are concerned that our current low order volumes appear to be presenting a problem to BellSouth.

18. BellSouth does not appear to be updating its billing system properly and rapidly. Orders are falling into a hold file, which prevents customers from receiving MCI branding on their OS/DA calls and causes double billing and potential service disruption. According to the BellSouth account team, it can take up to thirty days for a hold file error to be corrected. An examination of seven random orders that have been provisioned showed that in three cases CSOTS reflected that MCI owned the customer's account while the post migration CSR showed that BellSouth continued to own the account, which means the CSR had not yet been updated. More investigation will be required, but this spot check suggests that a significant number of orders will fall to a hold file, subjecting customers to billing by both BellSouth and MCI.

19. In summary, it does not appear that BellSouth's OSS in Georgia is capable yet of supporting commercial volumes of orders. The high number of customers losing dial tone shortly after migration and the apparently high level of manual processing are particularly troubling, and must be addressed before high volume ordering can be sustained. MCI intends to work with BellSouth to correct these problems and any new ones that emerge as our launch progresses. In the meantime, however, BellSouth cannot be said to be providing nondiscriminatory access to its OSS.

CHANGE MANAGEMENT

20. A number of functional improvements and defect corrections will need to be made to BellSouth's OSS. BellSouth's ability to make those changes quickly and effectively will be key to its ability to support our Georgia launch and the local entry of other CLECs.

21. The FCC has consistently emphasized the importance of change management. In its Order approving Bell Atlantic's New York Section 271 application, it explained that as part of a Bell company's demonstration that it provides efficient competitors a meaningful opportunity to compete, "the Commission will give substantial consideration to the existence of an adequate change management process and evidence that the BOC has adhered to this process over time."

In re: Application by Bell Atlantic New York for Authorization Under Section 271 of the Communication Act to Provide In-Region, InterLATA Service in New York, CC Docket No. 99-295, Memorandum Opinion and Order ¶ 102 (rel. Dec. 22, 1999) ("New York 271 Order"); see also In re: Application by SBC Communications Inc. et. al Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas, CC

Docket No. 00-65, Memorandum Opinion and Order, ¶ 106 (rel. June 30, 2000) (“Texas 271 Order”). As the FCC explained, “[w]ithout a change management process in place, a BOC can impose substantial costs on competing carriers simply by making changes to its systems and interfaces without providing adequate testing opportunities and accurate and timely notice and documentation of changes.” New York 271 Order ¶ 204.

22. BellSouth’s change management rules and its *implementation* of those rules must improve in a number of important ways before CLECs in the BellSouth region will have an adequate opportunity to compete.

23. To begin with, although BellSouth’s change control plan in theory allows CLECs to prioritize change requests, in practice BellSouth often delays implementation of CLEC-initiated requests. Thus, vital CLEC requests, such as provision of parsed CSRs often take years to implement. In approving Bell Atlantic’s New York section 271 application, the FCC emphasized that Bell Atlantic’s process “prioritize[d] changes based on merit, rather than the sponsor of the change,” *id.* ¶ 106, and noted “we would be concerned about the impact of a BOC disregarding input from competing carriers on change management issues.” *Id.* ¶ 124.

24. BellSouth’s change management plan includes processes for both BellSouth and CLECs to propose changes. BellSouth-initiated changes are called Type 4 changes; CLEC-initiated changes are called Type 5 changes. Under the Change Management Plan, Type 4 and Type 5 changes are supposed to be treated identically. First, a change request must be reviewed for acceptance by BellSouth within 20 days (obviously, for BellSouth requests, such acceptance is a given). Before BellSouth accepts the change request, the request is called a new request. After BellSouth has accepted the request, the request is considered a pending request. The next step is that BellSouth has 5-7 days to prepare for a change review meeting, and it must then

conduct such a meeting. At the meeting, CLECs prioritize change requests, including both Type 4 and Type 5 Change Requests, with one vote per CLEC. (BellSouth Change Control Process, Version 2.3, May 18, 2001 at 48). BellSouth then schedules those requests based on the priority order in upcoming releases and implements them.

25. There is nothing in the change management plan that requires BellSouth to schedule CLEC change requests. BellSouth can refuse to accept CLEC change requests, can accept them and not schedule them, or can schedule them and then change the schedule. This is so even if the CLEC's request is entirely reasonable and is prioritized by the CLECs. BellSouth has abused this authority in order to deviate from the change management schedule or simply to delay implementation of CLEC-initiated change requests because nothing in the plan precludes it from doing so.

26. Analysis of CLEC-initiated change requests shows that BellSouth delays implementation of these requests at each stage of the process.

27. As of June 29, 2001, there were 27 "new" Type V requests. Of these, 24 have been in new status for more than the 20 days the change management plan allots for BellSouth to accept a request. Most have been in new status for many months. One of the "new" change requests was submitted more than 15 months ago, one was submitted more than 14 months ago, one was submitted more than 10 months ago, one was submitted more than 9 months ago, one was submitted more than 7 months ago, one was submitted more than 6 months ago, two were submitted more than 5 months ago, two were submitted more than 4 months ago, two were submitted more than 3 months ago, four were submitted more than 2 months ago, and five were submitted more than 1 month ago. Thus, BellSouth has caused delays even in the earliest stage of the change control process.

28. Such delays often occur because BellSouth neither accepts nor rejects a CLEC request. For example, MCI recently requested that BellSouth extend the length of time for which LENS and TAFI passwords remain valid from 60 days to 1 year (CR0421). BellSouth responded that this was not its policy. But BellSouth did not officially reject MCI's change request. Thus, the request remains in limbo rather than being open for discussion with other CLECs.

29. Once BellSouth accepts a request, it often takes a long time before that request is placed on the ballot for CLECs to prioritize. As of June 29, 2001 there were 17 "pending" change requests on the status log on BellSouth's web site. Of these, 11 were CLEC-initiated change requests. Six of the 17 pending change requests had been pending since 2000. All were CLEC initiated (Type 5) change requests (CR133, 151, 177, 184, 246, 371). Even though BellSouth has had two change control meetings since the beginning of 2001 to prioritize requests, none of these six change requests was on the list to be prioritized.

30. Once a CLEC request is prioritized, it still must be scheduled for implementation. This also frequently takes many months. During its Georgia test, KPMG noted the "backlog of [CLEC] change requests that, at the time of this report, were prioritized but unscheduled for implementation into a release." (Georgia KPMG Report at CM-1-1-3.) BellSouth currently has scheduled only five Type 5 change requests for implementation in upcoming releases. In contrast, as of June 29, 2001, BellSouth's status log shows that 24 Type 5 change requests (and 17 Type 4 change requests) were in the status "candidate request," which means that they have been prioritized by the CLECs at a change control meeting but have not yet been scheduled for implementation. Three of these were submitted in 1999 -- CR 366 (handling of remaining service on partial migrations), 367 (LEAN/LEATN fields) and 368 (provide CFA on pre-order). All were Type 5 requests.

31. Some of the “candidate requests” that have not yet been scheduled for implementation were ranked very high by CLECs. CR135, for example, which was submitted by AT&T on August 9, 2000, was prioritized fourth by the CLEC community on the pre-ordering/ordering priority list at the January 31, 2001 meeting.^{1/} It was re-prioritized at the April 25, 2001 meeting because BellSouth failed to schedule it for implementation prior to that meeting, and it was again prioritized fourth. (CR135 is designed to enable a CLEC to electronically order a migration of a customer’s line to the CLEC and have that line added to an existing account the customer has with the CLEC). CR0040 was requested by AT&T on May 11, 2000 but was not even placed by BellSouth on the list of change requests to be prioritized until the April 25, 2001 meeting. At that meeting, it was prioritized *first*, yet it still has not been scheduled. (CR0040 is designed to enable CLECs to obtain real-time status information electronically). CR0020, a TriVergent Communications request to enable CLECs to view multiple CSRs simultaneously, was submitted on May 2, 2000, was prioritized fourth among pre-ordering requests at the *June 28, 2000* meeting, but was not scheduled to be implemented, and indeed has still not been scheduled, despite being re-prioritized seventh at the April 25, 2001 meeting.

32. A final example of BellSouth’s delay in scheduling implementation of candidate requests is MCI’s change request 0186. On September 26, 2000, MCI submitted this change request for use of the Interactive Agent protocol which would allow orders to be transmitted in real time, rather than being transmitted through a value added network that creates delay. MCI is already using Interactive Agent with other LECs. BellSouth initially responded that it would

^{1/} Change requests by one CLEC often benefit other CLECs. The prioritization process is designed to ensure that changes that benefit CLECs the most as a group are implemented first.

implement Interactive Agent with the scheduled release of CR0101 which had already been prioritized. In December 2000, BellSouth stated that CR0186 could not be worked with CR0101, but then reversed itself again on February 14, 2001, stating that the requests would be worked together. MCI escalated the issue on April 4, 2001. The change request was finally subject to prioritization at the April 25, 2001 meeting. It still has not yet been implemented.

33. Of the five Type 5 change requests that BellSouth presently has scheduled to be implemented in upcoming releases, three of these are longstanding requests: CR53 (BBR-LO Improvements, requested 5/22/2000), CR364 (ability to use form for directory listing that drops from 411/directory assistance, requested 8/12/1999), and CR369 (formerly TAG0812990003) (parsed CSRs, requested 8/12/1999).

34. I found that even when BellSouth implements CLEC-initiated change requests and does so without extensive delay, it takes nearly twice as long to do so on average as it does with BellSouth-initiated change requests. Well under half of the change requests submitted between 1999 and 2001 have been implemented. Of these, BellSouth took nearly twice as long to implement CLEC-initiated requests as it did BellSouth-initiated requests. For those Type IV and Type V change requests that were actually implemented in 1999 and 2000, BellSouth took an average of 2.35 months to implement BellSouth-initiated change requests^{1/} and 4.28 months to implement CLEC-initiated change requests. (These averages were obtained by printing out

^{2/} For example, CR 0216, NPORD Data for FOC (Issue 7 – LNP for Ordering impact) was submitted by BellSouth on November 13, 2000 and implemented on December 10, 2000. CR 0219, standard interval changes for loop (LNP for ordering impact) was submitted by BellSouth on November 13, 2000 and implemented on December 10, 2000, and CR 0247, reduce due date interval from 5 to 4 days for SL1 in TAG (system and documentation impact for LENS and TAG within the preorder and order interfaces) was submitted on December 15, 2000 and implemented on January 27, 2001.

the change control log archive, which does not include changes implemented in 2001, on BellSouth's web site and averaging the months for Type IV and Type V changes.)

35. BellSouth's delay in implementing important CLEC-initiated changes often has significant negative impacts on CLECs. This is evident from examining three change requests related to integration of pre-ordering and ordering. It is fundamental to effective OSS that CLECs are able to take information received at the pre-ordering stage and use it to populate an order without having to re-type that information. Re-typing the information significantly increases delay and leads to errors. Moreover, only integrated interfaces can allow national CLECs such as MCI to create a standard set of pre-ordering screens to present to their customer service representatives. In fact, the FCC rejected all three of BellSouth's Section 271 applications in part because BellSouth did not provide CLECs access to a pre-order interface that could be effectively integrated with the CLECs' ordering interfaces. *In re: BellSouth Corporation Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in South Carolina*, CC Docket No. 97-208, ¶¶ 155-66 (rel. Dec. 24, 1997); *In re: Application by BellSouth Corp., et al. for Provision of In-Region, InterLATA Services in Louisiana*, CC Docket No. 97-231, ¶¶ 49-55 (rel. Feb. 4, 1998); *In re: Second Application by BellSouth Corp., BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Louisiana*, CC Docket No. 98-121, ¶¶ 96-103 (rel. Oct. 13, 1998).

36. CLECs have submitted three change requests related to integration and all have met with extensive delays. On August 12, 1999, AT&T submitted change request 0369 requesting fielded, parsed CSRs. Parsed CSRs return pre-order information in individual fields that can be directly populated on the corresponding ordering fields, rather than concatenated

information that must be broken up into parts to enter into ordering fields. Parsed CSRs are by far the most effective means of achieving pre-order/order integration. In approving Bell Atlantic's New York Section 271 application, the FCC stated that, "the BOC must enable competing carriers to transfer pre-ordering information electronically to the BOC's ordering interface or to the carriers' own back office systems, which may require 'parsing' pre-ordering information into identifiable fields." New York 271 Order ¶ 137. And in the Texas 271 Order, the FCC concluded that although parsed CSRs were not the only way that a BOC could enable CLECs to integrate pre-ordering and ordering, a BOC could most readily show its interfaces were integratable by offering parsed CSRs. Texas 271 Order ¶ 153.3

37. Nonetheless, BellSouth has repeatedly delayed implementation of parsed CSRs. In response to CR0369, BellSouth initially stated that it would develop a project plan for implementing parsed CSRs during the Y2K window at the end of 1999 and beginning of 2000. But it was not until September 2000 that BellSouth even began addressing the change request with the CLECs. It was only at the September 27, 2000 meeting that parsed CSRs were submitted to change control for prioritization (at the time, the request had a different number, TAG0812990003). CLECs prioritized parsed CSRs *first* among pre-ordering requests at the September 27, 2000 meeting. But BellSouth still did not schedule implementation of parsed CSRs. Eventually BellSouth provided an implementation date of December 2001, which has now slipped again to sometime in 2002, close to two-and-a-half years after the request was first made.

3 Although the FCC approved SWBT's application in Texas without requiring a parsed CSR, in the BellSouth region, where CLECs long ago requested and prioritized such parsed CSRs in the change management process, BellSouth should be providing fully parsed CSRs. Moreover, SWBT, unlike BellSouth, had agreed to promptly effectuate integration through adoption of a process allowing CLECs to migrate UNE-P orders without including a

38. In contrast, in concluding that Bell Atlantic's change management process in New York was adequate, the FCC specifically noted that "when MCI WorldCom expressed a preference regarding how customer service record addresses be made available to competing carriers, Bell Atlantic agreed to add this functionality within the remaining *weeks* before the related change release. At the same time, Bell Atlantic devised a special software approach to defer implementation of this functionality for AT&T, the sole competing carrier that objected to this change." New York 271 Order ¶ 124 (emphasis added). BellSouth has not been remotely as responsive to the request for parsed CSRs in its region.

39. On August 9, 2000, MCI submitted a second change request (0133) that would have significantly contributed to integration of pre-order and order interfaces. MCI requested that BellSouth enable CLECs to submit migration orders with the customer's name and telephone number but without a service address. Because one of the most difficult aspects of integration is taking service address information from the pre-order stage and using it to populate an order, this change request would have substantially reduced rejects based on inaccurate address information. Indeed, both Verizon and SWBT enable carriers to place orders without a service address in order to enable better integration of pre-ordering and ordering, and, in approving SWBT's section 271 application in Texas, the FCC noted that this enhancement "provides assurances that carriers that have yet to attempt integration should be able to avoid the burden of receiving and processing a large number of address-related rejects." Texas 271 Order ¶ 160.

service address on the orders. As discussed below, BellSouth has not implemented a similar process despite MCI's request in the change management process.

40. When MCI submitted CR0133, it indicated that the request had a high priority. Nonetheless, BellSouth originally resisted the change, suggesting that a similar change was being considered by industry bodies. It later accepted the change request and seemed to combine its consideration with a similar AT&T request, EDI1121599001, which had been pending since *December 1999*. That request was prioritized sixth by the CLECs on the ordering list at the September 27, 2000 meeting.

41. Neither AT&T's nor MCI's request was scheduled for implementation, however, nor were they placed on the list to be reprioritized at the January 31, 2001 meeting. On March 15, 2001, BellSouth announced that the request would be re-prioritized at the March 28, 2001 meeting. But BellSouth then unilaterally withdrew the request from consideration for re-prioritization, claiming that the change was inconsistent with new requirements to place address fields on certain orders. For some reason, BellSouth subsequently informed MCI (in May 2001) that the migration by telephone number was in testing and would be targeted for a future release. Thus, the status of this change request remains unclear.⁴

42. AT&T long ago submitted a third change request that is important for integration of pre-ordering and ordering and that has only recently been scheduled. On March 1, 2000, AT&T submitted CR2 to correct business rule discrepancies between pre-ordering and ordering. The length of some pre-order fields exceeded that of corresponding order fields so that if pre-order information was submitted on an order the information would be truncated. The FCC has emphasized that when a BOC "becomes aware of any inconsistencies in field names or formats that would impede a carrier's ability to integrate pre-ordering and ordering functions, we expect

⁴ While MCI has been able to design its interface to obtain service addresses through the service address verification process and place those on its orders, this process often leads to rejects based on service address errors and also is

that [the BOC] promptly will design and deploy a software correction or provide the necessary technical assistance to competing carriers in the interface integration.” New York 271 Order ¶ 139. Nevertheless, after AT&T submitted CR2, BellSouth failed to submit that request to CLECs for prioritization. Instead, more than a year after AT&T submitted the request, BellSouth finally responded by scheduling the change for implementation in the July 28, 2001 release.

43. BellSouth’s delay in implementing change requests that are needed to ensure integratable interfaces underscores its more general failure to respond effectively to CLEC-initiated change requests. BellSouth must begin responding more effectively to CLEC requests before obtaining Section 271 authorization.

44. There are a number of other problems. One important problem is that BellSouth fails to implement Type 6 changes quickly enough. A Type 6 change “is any non-type 1 change that corrects problems discovered in production versions of an application interface” either because the interface is not working in accordance with published requirements or because agreed-upon requirements result in inoperable functionality. (May 18, 2001 Change Control Process document (Version 2.3) at 37.) BellSouth separates Type 6 changes into High Impact (impairs critical functions and no electronic workaround exists); medium impact (impairs critical system functions, though a workaround solution does exist), and low impact (causes inconvenience or annoyance). The change control process calls for BellSouth to internally determine solutions for high impact defects in 4-25 days with best effort used to achieve the earlier number, medium impact defects in 90 days with best effort used to achieve the earlier

completely ineffective during the many times that TAG is down. BellSouth should have much more rapidly implemented the CLEC-requested changes that would have led to more effective integration.

number and low impact defects using best effort. (Additional time is required for other steps in the resolution process.) BellSouth has rejected the CLECs' balloted proposal in which it would be required to complete the internal resolution process for high and medium impact defects in 4-10 business days with best effort used to achieve the earlier number, and low impact defects within a 4-20 business day range with best effort used to achieve the earlier number. (BellSouth Change Control Process Working Document, May 18, 2001, Version 2.3 at 47-48.)

45. A medium impact defect affects critical functionality, but a manual workaround exists. Given MCI's expected order volume (based on its order volume in other states), MCI cannot fall into a manual mode for more than 90 days. This will be extremely costly to MCI and will also result in extensive delays. "Low" impact defects which cause inconvenience should also be resolved rapidly, not left to a "best efforts" standard.

46. BellSouth's failure to commit to more rapid implementation of Type 6 changes was the subject of an arbitration between AT&T and BellSouth in Florida in Docket No. 000731-TP. In its Order No. PSC-01-1402-FOF-TP issued on June 28, 2001, the Florida Public Service Commission ruled that BellSouth's timeframe for high impact defects should be shortened to 4-10 business days. Further, the time for developing a temporary solution for medium impact defects was shortened to two days.

47. BellSouth, unlike other BOCs such as Verizon, has not had any fixed release schedule based on which new interface versions will be released on specific days of the month or specific months of the year, so that CLECs can plan well in advance when to expect a release. BellSouth has now agreed to provide such a schedule, which is a significant improvement. However, BellSouth has not agreed to include in that schedule the expected content of future releases. The schedule will provide the days on which releases will occur but not what

functionality will be included in those releases. Thus, CLECs still cannot plan in advance as to when specific changes can be expected. Moreover, CLECs have no means to assess whether BellSouth is appropriately implementing CLEC change requests until the releases are almost upon them.

48. Verizon and SWBT long have had schedules on which releases occur on particular days and provide well in advance a list of the planned functionality that will be incorporated in each release. The FCC thus noted approvingly that SWBT provides “competing carriers with a ‘12-Month Development Plan,’ which reflects SWBT’s plans for future OSS modifications.” Texas 271 Order ¶ 111. BellSouth should do the same.

49. BellSouth has not yet definitively agreed to provide CLECs with documentation sufficiently in advance to allow them time to code to that documentation and test their new interfaces prior to a release date. Indeed, BellSouth’s Change Control Process Version 2.3 provides that business rules must be released only “30 days or more in advance of implementation date.” (May 18, 2001 at 26.) Thus, BellSouth’s release 9.4, which BellSouth characterizes as a major release, is scheduled to be implemented on July 28, 2001, yet BellSouth was not scheduled to release final business rules until June 28, and final user requirements until June 8. This is clearly insufficient time for CLECs to code their interfaces. In fact, KPMG noted in its Georgia Report that “the stated 30-day notification interval applicable specifically to software releases may be insufficient for CLEC coding and associated release preparation.” (Georgia KPMG Report at CM-1-1-5.) The 30-day interval also provides CLECs insufficient time to comment on business rules and ferret out errors. This may explain why KPMG has

opened numerous exceptions in Florida (for example, Exceptions 40, 41, 42, 45, and 46) related to defects in Verizon's business rule documentation.

50. In its working document for change control, BellSouth has agreed to provide draft user requirements for major releases 90 days in advance of the release implementation date and final user requirements 45 calendar days in advance of the release date. However, this remains entirely insufficient. It provides CLECs very little time to code their interfaces before they must begin testing those interfaces. In its working document, BellSouth rejected CLECs' proposal that final documentation should be provided 45 days in advance of *the CLEC test date*.

(BellSouth Change Control Process Working Document, May 18, 2001, Version 2.3 at 21.)

Moreover, BellSouth's commitment does not apply to minor releases.

51. The FCC has emphasized the importance of a stable testing environment that mirrors the production environment and that enables CLECs to ensure interfaces are ready before they begin using those interfaces. *Id.* ¶¶ 108-09, 111, 119-22; Texas 271 Order ¶¶ 132-43. BellSouth has only recently implemented a CLEC Test Environment that is separate from the production environment. (Stacy Aff. ¶ 117.) Indeed, after MCI launched service in Georgia in May 2001, it could not do additional testing unless it was willing to do so in the production environment, at a risk to our customers, which it was not.

52. BellSouth recently put in place its "CAVE" testing environment which is a separate testing environment. For the last several weeks, MCI has been attempting to complete the procedural steps needed to use BellSouth's CAVE testing environment, significantly longer than has been needed to take these steps with other LECs, and it appears that it will take an additional several weeks. MCI therefore has no experience with CAVE. Other CLECs have

little experience with CAVE. (Stacy Aff. ¶ 118.) Thus there is not yet any basis for concluding that CAVE is adequate.

53. BellSouth's change management plan does not provide for a go/no go vote that would enable CLECs to preclude implementation of a new release that CLECs have determined does not contain sufficient new functionality to be cost advantageous. The FCC noted approvingly the existence of such a go/no go mechanism in SWBT's change management plan. Texas 271 Order ¶ 112.

54. Because interfaces are developed for the benefit of CLECs and the implementation of a new interface means that a prior version of that interface will be phased out, CLECs should be able to determine whether a new interface will be implemented.

55. The Georgia OSS test does not demonstrate that BellSouth's change management process is adequate. KPMG did not specifically address some of the problems described here such as the lengthy time frame for implementation of Type 6 changes. KPMG appears to concur that other problems exist, despite its conclusion that BellSouth's performance was satisfactory. For example, as noted above, KPMG describes the "backlog of [CLEC] change requests that, at the time of this report, were prioritized but unscheduled for implementation into a release." (Georgia KPMG Report at CM-1-1-3.) KPMG also describes the balloting of proposals designed to help alleviate the backlog and noted that its "change management evaluation concluded prior to CLEC-BLS voting on these balloted items." *Id.* KPMG nonetheless found BellSouth's change control process satisfactory without explaining why.

56. Similarly, KPMG describes BellSouth's failure to follow the change control process in issuing an updated version of business rules in September 2000, and BellSouth's

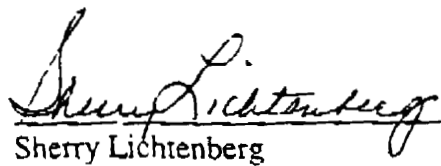
failure to consistently provide proper notification to CLECs for Type 1 system outages between September 2000 and January 2001. (Georgia KPMG Report at CM-1-1-2.) KPMG describes steps BellSouth took to alleviate these problems but does not indicate it conducted any retest to determine that the fixes had worked. (Georgia KPMG Test CM-1-1-2.)

57. In Florida, KPMG has several open exceptions and observations regarding BellSouth's change management process. In Florida, KPMG opened Observation 21 (December 13, 2000) and later Exception 23 (March 12 2001) on the basis that Bell South's distribution of carrier notification information is inadequate. BellSouth's change control process "does not clearly define when CLECs are to receive notification of documentation updates, or when they are to receive the actual documentation"; moreover, the notifications themselves are missing "significant information." This "can hamper the ability of CLECs to provide service to their customers and conduct business with BellSouth."

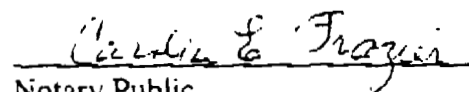
58. In Florida, KPMG also opened Observation 26 (no documentation to correlate TAG interface with the version of business rules to which it is applicable). It opened Observation 56 on the basis that "BellSouth implemented business rules updates from the BellSouth Business Rules for Local Ordering – OSS 99, Issue 9L prior to its release on March 30, 2001." In particular, BellSouth changed a field that was conditionally required to one that was conditionally prohibited, leading to rejection of KPMG's order. And on February 14, 2001, KPMG opened Exception 12, finding that "BellSouth does not adhere to the procedures for System Outages." In the majority of cases it fails to notify CLECs of outages or notifies them late. In a retest, BellSouth still only met the system notification standard for 42% of the outages. MCI was not receiving any outage notices in Georgia until the last couple of weeks and has not

yet been able to discern whether these notices are being provided in a timely fashion. “Without proper notification of System Outages, CLECs may not be aware of the potential problems that may arise from the outage.” *Id.*

59. BellSouth’s change control Process and BellSouth’s implementation of that process must undergo a number of improvements before that process can be deemed satisfactory.


Sherry Lichtenberg

Sworn to and subscribed before me
this 5th day of July, 2001.


Notary Public

My Commission expires:

**MY COMMISSION EXPIRES
JUNE 14, 2004**