

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc. )  
N/K/A IDS Telecom, L.L.C., Against )  
BellSouth Telecommunications, Inc., and )  
Request for Emergency Relief. )  
\_\_\_\_\_ )

DOCKET NO. 010740-TP

FILED: JULY 23, 2001

DIRECT TESTIMONY

OF

BECKY WELLMAN

ON BEHALF OF

IDS TELCOM, L.L.C.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 010740-TP

DIRECT TESTIMONY OF BECKY WELLMAN

1 Q: Please state your name and business address.

2 A: My name is Becky Wellman. My business address is 1525 NW 167<sup>th</sup> Street,  
3 Miami, Florida 33169.

4 Q: For whom are you employed and in what position?

5 A: I am employed by IDS Telcom, LLC ("IDS"). My position with IDS is Assistant  
6 Vice President of Local Operations.

7 Q: Please describe your duties at IDS.

8 A: I am responsible for the provisioning of end user requests to install, convert,  
9 or otherwise modify the telephone service and related features of IDS  
10 telephone subscribers. In addition, I establish and maintain operational  
11 policies and procedures as they relate to the provisioning of Resale and  
12 Unbundled Network Element Platform ("UNE-P") products obtained from  
13 BellSouth Telecommunications, Inc. ("BellSouth") pursuant to the  
14 Interconnection Agreement, as amended, executed by IDS and BellSouth and  
15 approved by the Florida Public Service Commission.

16 QUALIFICATIONS AND EXPERIENCE

17 Q: Please describe your education and work experience.

18 A: My resume is attached to this testimony and identified as Exhibit BW-1.

19 Q: What is your educational background?

1 A: I graduated from Sandy Springs High School in 1965 and attended the  
2 University of Georgia from 1965-1966.

3 Q: What work experience have you had in the telecommunications field?

4 A: I worked for BellSouth Telecommunications, Inc. ("BellSouth") for thirty years  
5 in a variety of job categories, beginning as an Operator. I subsequently  
6 worked for BellSouth as a Retail Service Representative, Maintenance  
7 Administrator, and Load Control Manager. When I left BellSouth in July 2000,  
8 I held the position of Operations Staff Support Manager for all BellSouth Local  
9 Carrier Service Centers ("LCSCs"). For a total of approximately eleven years,  
10 I was a Customer Service Representative for BellSouth in its Retail Division.  
11 During that period of time, the overall processing of customer service  
12 requests or service orders evolved from a paper order which had to be  
13 handwritten and handled manually from beginning to end to having the ability  
14 to process an order totally electronically as it exists today. The actual flow of  
15 the orders remained much the same but was developed and refined to  
16 eliminate unnecessary manual intervention. This electronic process allows  
17 BellSouth to enter its customers' requests into its internal ordering systems in  
18 real time, correcting immediately any input errors whether they were caused  
19 by a simple typing error or because a customer provided incorrect  
20 information. These systems even give Service Representatives prompts for  
21 inputting correct data so that when the customer hangs up, he has been  
22 assured of the correctness of his order and its due date. As a Maintenance  
23 Administrator for three years, I handled BellSouth customers' reports of

1 trouble on their telephone line. My responsibilities included testing to  
2 determine the origin of the trouble, verifying line translations to ensure all line  
3 services (hunting, call waiting, etc.) were correct, and checking the facilities in  
4 the central office switch. If I detected trouble, I was responsible for  
5 categorizing the trouble ticket so that it would be given to the type of  
6 technician who was best suited to clear the trouble. I was then promoted to  
7 Load Control Manager for the entire downtown Atlanta area. For six years my  
8 main responsibilities were to determine and set repair and installation  
9 intervals based on the forecasted load, to dispatch technicians to install or  
10 repair lines within the time frame which the customer was given, and to  
11 effectively reduce overtime costs while increasing productivity and quality. In  
12 addition to my regular job duties, I also set up and ran the 1996 Olympic  
13 operations. I was consistently ranked as one of the top three Load Control  
14 Managers in the entire state of Georgia. I then was promoted to BellSouth  
15 Interconnection Staff supporting the LCSC and became the Subject Matter  
16 Expert ("SME") in BellSouth for Selective Call Routing, Interim Number  
17 Portablility, Port, and UNE-P.

18 Q: What are your credentials in regard to the specific subject matter of your  
19 testimony?

20 A: Besides the knowledge and experience I have accumulated in my tenure of  
21 more than thirty years working for what is now known as BellSouth  
22 Telecommunications, Inc., during the period from May 1998 through July

1           2000, I held the position of Operations Staff Support Manager for all  
2           BellSouth LCSCs.

3   Q:    What were your responsibilities as the Operations Staff Support Manager  
4           during the above period of time?

5   A:    Beginning in July 1998, I was intimately involved with the development of the  
6           provisioning of local telephone service and features through UNE-P or similar  
7           arrangements with CLECs and actually wrote BellSouth's Methods and  
8           Procedures currently used by the BellSouth Service Representatives in all the  
9           LCSCs . These Methods and Procedures outlined the responsibilities of the  
10          Service Representatives and specifically instructed them on how to review a  
11          Local Service Request ("LSR") for correctness, and input an accurate order in  
12          relation to the products I supported. These M & Ps were developed for the  
13          sale of local telephone services and features through UNE-P arrangements  
14          with CLECs.

15   Q:    Are there any other factors regarding your qualifications or tenure as  
16          Operations Staff Support Manager that are relevant to your testimony?

17   A:    Yes.    Prior to November 1999 and the release of the Federal  
18          Communications Commission's ("FCC's") 319 Remand, I was part of a project  
19          team that was developing a product called "Network Combination." This  
20          project was a BellSouth offering which became the basis for the development  
21          of what is known today as the Unbundled Network Element Platform or "UNE-  
22          P."

1           In approximately November 1999, when the FCC released its 319  
2 Remand, I was re-assigned to the project team that was dedicated to the  
3 development of the UNE-P products as mandated by the FCC. My role was  
4 to represent the BellSouth LCSCs on that project team. During the  
5 development of these UNE-P products, I worked closely with the Subject  
6 Matter Experts (“SME”) from various BellSouth departments including  
7 Network and Billing, Recent Change Memory Administration Center  
8 (“RCMAG”), Line Facility Administration Center (“AFIG”), and CRIS Billing. I  
9 worked with the project team five days a week exclusively on product  
10 development for the UNE-P in order to meet the FCC imposed deadline of  
11 February 17, 2001.

12           I was directly involved in the development and testing of BellSouth’s  
13 internal procedures related to the processing of LSRs on behalf of CLECs  
14 and as directed by the FCC’s 319 Remand during November 1999.

15 Q:   What BellSouth employees were assigned to the UNE-P Project Team and  
16 what were their respective titles?

17 A:   The main BellSouth employees on the UNE-P Project Team, besides myself,  
18 were the PCU (“Product Commercialization Unit”) Project Manager, Ms.  
19 Sandra Harris, the Network Subject Matter Expert, Ms. Carla Lockerd, the  
20 RCMAG SME, Mr. Frank Eberle, the AFIG SME, Ms. Jayne Sullivan, the  
21 CRIS Billing SME, Ms. Debbie Williams, and the Product Manager, Mr.  
22 William Gulas.

23 Q:   Who presided over the meetings of the UNE-P Project Team?

1 A: As the Project Manager, Ms. Sandra Harris presided over the meetings of the  
2 UNE-P Project Team. Part of her responsibilities as Project Manager was to  
3 document every aspect of the development and testing of the UNE-P  
4 products in order to report to upper management.

5 Q: To whom did the Project Team report in the BellSouth management?

6 A: The Project Team reported to Ms. Suzy Lavett, Director of PCU, and Ms.  
7 Peggy Caldwell, Senior Director of PCU.

8 Q: Have you previously testified before any regulatory authority or courts of law?

9 A: No.

10 PURPOSE AND SUMMARY OF TESTIMONY

11 Q: What is the purpose of your testimony?

12 A: I will address Issue One (“Has BellSouth breached its Interconnection  
13 Agreement with IDS by failing to provide IDS OSS at parity?”) and Issue Two  
14 (“Has BellSouth breached its Interconnection Agreement with IDS by failing to  
15 provide IDS UNE-Ps at parity?”) as identified by the parties and established  
16 by the Prehearing Officer in this proceeding.

17 Q: Please summarize your testimony.

18 A: My testimony describes the specific procedures by which BellSouth provides  
19 services to its own retail customers and the specific procedures by which  
20 BellSouth provides Operational Support Systems (“OSS”) and UNE-Ps to IDS  
21 and other CLECs generally. It is my experience that BellSouth has not  
22 provided and cannot provide IDS OSS and UNE-Ps at parity to those services  
23 provided to BellSouth’s own customers through its Retail Division because of

1 the inherently flawed structure of its CLEC Interfaces and the Local Carrier  
2 Service Center operation. My testimony provides a detailed explanation of  
3 the Methods and Procedures (“M & P”) used by all BellSouth Service  
4 Representatives at the three BellSouth LCSCs and an analysis of those  
5 Methods and Procedures as they have affected IDS and other CLECs. These  
6 Methods and Procedures include among many other topics, CLEC order  
7 processing and network access and billing processes and procedures used  
8 by BellSouth under current arrangements with CLECs and in particular with  
9 IDS.

10 Q: Regarding Issue One in this proceeding, what is your understanding as a lay  
11 person of the term “parity” in relation to BellSouth’s obligation to provide IDS  
12 OSS at parity?

13 A: My definition of “parity” as a lay person in this context is that BellSouth is  
14 required to provide IDS Operational Support Systems that process IDS’  
15 orders for new customers or changes or additions to the services of existing  
16 IDS customers that are equivalent in all respects to those systems BellSouth  
17 utilizes for its own retail customers. To me, this means that if BellSouth can  
18 provide installation of a certain type of telecommunications service to one of  
19 its retail customers in a certain time frame and at a certain level of quality, it  
20 must provide installation of that same type of telecommunications service to  
21 IDS’ customer in an equivalent time frame and at the same level of quality.

22 Q: Has it been your experience that BellSouth has provided IDS OSS at parity?

1 A: No, it has been my experience that BellSouth has continually and consistently  
2 provided IDS OSS that is far below parity.

3 Q: Why do you believe BellSouth provides IDS OSS that is not at parity?

4 A: BellSouth has failed to develop Operational Support Systems for the  
5 processing of orders for IDS and other CLECs that are capable of providing  
6 services at parity to those provided to BellSouth's retail customers. There is  
7 no comparison, much less parity, between the internal systems BellSouth  
8 utilizes to process orders for its retail customers and the Local Carrier Service  
9 Centers that process orders for IDS and other CLECs.

10 Q: Can you explain why you say this?

11 A: I say this because I am intimately familiar with the internal systems BellSouth  
12 utilizes to process orders for its own retail customers and I am intimately  
13 familiar with the Operational Support Systems BellSouth has utilized to  
14 process orders for IDS and other CLECs.

15 Q: Can you describe your experience with BellSouth's internal systems?

16 A: As a Service Representative and Maintenance Administrator, I worked with  
17 BellSouth's internal systems on a daily basis. I gained vast knowledge from  
18 regularly interfacing with BellSouth employees in downstream work groups to  
19 expedite orders or resolve troubles. Also as a Load Control Manager, I  
20 worked closely with the translations, facilities, and central office groups.

21 Q: Can you describe how BellSouth's internal systems process orders for  
22 BellSouth's retail customers?

1 A: When a retail customer calls BellSouth for service, he speaks directly to the  
2 Service Representative who will input an order directly into one of their  
3 ordering systems, SONGS or DOE, while the customer is on line. The  
4 ordering systems are designed to prompt the Service Representative during  
5 the input process if certain information, which is required for processing, is  
6 missing or invalid. This permits the Service Representative to question the  
7 customer for correct information in real time and allows her to change it  
8 immediately. Information is also formatted properly by the systems even if it  
9 was not entered correctly by the Service Representative. The ordering  
10 system assigns a telephone number if necessary and the earliest due date  
11 available based on what the end user's address facilities are and on the Load  
12 Control Manager's forecast for that type of service. The ordering system will  
13 continue to perform online edits to ensure accuracy before it allows the order  
14 to be released giving the Service Representative repeated opportunities to  
15 obtain all necessary information while the customer is still online. Depending  
16 on the service request, the order will flow downstream to RCMAG, AFIG,  
17 WMC and CRIS to be completed. This can generally be done electronically  
18 with no manual intervention unless a dispatch is required.

19 Q: Now that you have described how BellSouth 's internal systems process  
20 orders for BellSouth's retail customers, can you give us a comparably clear  
21 description of how BellSouth's current Local Carrier Service Centers are set  
22 up and how BellSouth processes orders from IDS and other CLECs?

1 A: Yes. When a CLEC submits an LSR, it must follow the specific BellSouth  
2 Business Rules for Local Ordering (“BBRLO”) which are available for review  
3 on line or on paper, but which are not necessarily going to be present as an  
4 edit while the LSR is being entered into the electronic interface. Because of  
5 defects in the internal BellSouth OSS, the LSR might go through only to be  
6 returned for clarification a day or two later. Once the LSR is accepted by the  
7 interface, editing is performed by a BellSouth system called LEO and if there  
8 are errors, the LSR will be rejected back to the CLEC for correction and  
9 resubmission. If there are no errors, LESOG will generate an order and send  
10 it to downstream systems and send the CLEC an FOC (“Firm Order  
11 Confirmation”) with the due date that has been assigned to the order. If a  
12 condition exists that will not allow LESOG to generate an order (multi-line  
13 hunting, denials, restorals, BellSouth Customer Service Record errors, etc.),  
14 the request will drop to the LCSC to review the request and determine what  
15 needs to be done to generate an order. The LCSC Service Representative  
16 has eighteen business hours (two days and two hours) to generate the order  
17 and return an FOC or send it back for clarification from the CLEC. The  
18 clarifications that are returned are often invalid and a call to the LCSC is  
19 required to get the LSR processed. If the clarification is valid, the CLEC must  
20 submit a supplemental request and may again have to wait for the eighteen  
21 business-hour FOC. Although the LCSC Service Representative should  
22 provide all clarifications after the first review, often this process will have to be  
23 repeated several times. The process for submitting a supplemental request

1 cannot be overridden, so the CLEC is basically at the mercy of the LCSC for  
2 the timely processing of LSRs. Once the LCSC Service Representative is  
3 ready to input the order, she or he uses the same order input systems that  
4 BellSouth Retail Service Representatives use. However, if she encounters an  
5 edit from the system, she may reject it back to the CLEC for clarification and  
6 the whole process will begin again. If she is able to submit the order, the due  
7 date is assigned based on the BellSouth Interval Guide, not on the first  
8 available appointment per the Load Control Manager as it is in the Retail  
9 Division. At that point, an FOC is sent back to the CLEC with the due date.

10 Q: Can you describe your involvement in the development of the UNE-P product  
11 for BellSouth?

12 A: Beginning in July 1998, I was intimately involved with the development of  
13 BellSouth's Methods and Procedures ("M & Ps") currently used by the  
14 BellSouth Service Representatives and all the LCSCs related to provisioning  
15 of local telephone service and features through UNE-P arrangements with  
16 CLECs. These M & Ps outlined the responsibilities of the Service  
17 Representatives and specifically instructed them on how to do their jobs in  
18 relation to the products I supported. These M & Ps were developed for the  
19 sale of local telephone services and features through UNE-P arrangements  
20 with CLECs.

21 Q: What was the directive given to the UNE-P Project Team by BellSouth  
22 management in November 1999 that you alluded to earlier?

1 A: We were instructed to develop the UNE-P products as mandated by the FCC  
2 and be prepared to roll-out the products by the February 17, 2001, deadline  
3 established by the FCC order.

4 Q: Did the UNE-P Project Team encounter difficulty developing this product?

5 A: Yes. During the development and testing process for the UNE-P program,  
6 the Project Team experienced end-user outages. We also learned that during  
7 the original conversions of Retail customers to a CLEC's Resale service  
8 processed using the Disconnect and New ("D & N") procedure, end-users  
9 also frequently experienced outages. As such, the Resale team developed  
10 the Change ("Single C") format that eliminated the need for a disconnection  
11 and corresponding new connection or D & N procedure during Resale  
12 conversions between BellSouth and a CLEC.

13 Q: Did the use of the Single C format eliminate the frequent service outages  
14 associated with the D & N procedure during Retail to Resale conversions?

15 A: Yes.

16 Q: Did the UNE-P Project Team experience end-user service outages or service  
17 feature disruptions during conversions from Retail or Resale to UNE-P  
18 conversions between BellSouth and CLECs?

19 A: Yes. During conversions to UNE-P using the D & N procedure, end-users  
20 experienced service outages. Additionally, end-users experienced several  
21 service feature disruptions. Because the end-user outages were so prevalent  
22 during the conversion to UNE-P using the D & N process, we explored  
23 numerous paths to develop different methods for UNE-P processing,

1 including the modification of the Single C format. However, because the  
2 Single C format was developed for Resale, there were too many edits and  
3 limitations surrounding the process and we were unable to amend it  
4 adequately to work with the UNE-P program.

5 The team was equally concerned that the BellSouth Legacy System,  
6 which supports these arrangements and processes that are so heavily relied  
7 upon by BellSouth and the CLECs for conversions, was limited in its  
8 capabilities to support the conversions. As such, one or more of the  
9 members of the Project Team concluded that the only process that would  
10 work, albeit with consequences, was the D & N process.

11 Q: Did the Project Team as a whole or through individual team members object  
12 or express concern over the utilization of the D & N process for UNE-P  
13 provisioning and the subsequent end-user outages and service feature  
14 disruptions?

15 A: Yes. Everyone on the Project Team expressed serious concern about the  
16 end-user outages to upper management throughout the development and  
17 testing of the UNE-P. In particular, however, Peggy Caldwell and Ken  
18 Ainsworth agreed that there was reason for concern based on the history of  
19 the original D and N process in the Retail to Resale scenario. The Project  
20 Team tested orders for Retail and Resale and from various locations in  
21 various states within the region. This allowed us to determine that the  
22 problem was system-wide and not limited to a certain part of the BellSouth  
23 territory. These problems have nothing to do with the location of the CLEC

1 because all CLECs in every BellSouth state experience the same types of  
2 conversion problems. The same three LCSCs handle all the orders for every  
3 CLEC in the region. We found that the outages occurred despite our best  
4 efforts to complete the test orders without error. The Project Team was very  
5 concerned that if we who developed the process still experienced end-user  
6 outages in varying forms, there was a great likelihood of serious complications  
7 occurring during thousands of daily conversions between BellSouth and  
8 various CLECs on any given day. The results, we feared, could prove  
9 disastrous. I have personally witnessed that concern played out as a reality  
10 on a daily basis as IDS attempts to do its business. IDS daily submits orders  
11 to BellSouth for UNE-Ps and constantly has those orders incorrectly,  
12 inefficiently, and ineffectively processed. This is the same experience that  
13 any CLEC will have when it attempts to process UNE-P orders with  
14 BellSouth. At times, I personally have to instruct the personnel in the  
15 BellSouth LCSCs regarding how to correct end-user service outages they  
16 cause during conversions of IDS customers. It is evident the problems are  
17 the same as those the Project Team encountered during the UNE-P  
18 development stages. It is also completely clear that BellSouth has done little  
19 if anything to correct the procedure since its inception despite the ongoing  
20 end-user outages.

21 The UNE-P order process was developed with a conscious effort by  
22 the Project Team to avoid the end-user outages and feature disruptions  
23 caused by the D & N format, however, the process relies heavily on effective

1 and efficient manual and electronic handling of each order. The Project Team  
2 continued testing the process until the outages were minimized, but because  
3 there were specific personnel handling the flow-through process in certain  
4 departments, like the LCSC, the results were obviously skewed. If these  
5 processes are not handled by well trained and sufficiently experienced LCSC  
6 representatives with the proper escalation personnel on staff at all times, the  
7 likelihood of an outage or disruption during conversion drastically increases in  
8 relation to the increase in the number of orders being processed by a given  
9 LCSC.

10 In contrast, the Single C format mentioned above and which is further  
11 detailed herein, will not allow for the possibility of a service outage nor does it  
12 generally require the critical manual component, thereby reducing further the  
13 likelihood of an outage during conversions.

14 Q: You have stated that BellSouth assigned specifically trained and experienced  
15 individuals to oversee the processing of conversions during the  
16 developmental stages of the UNE-P program. Do you believe it is possible  
17 that BellSouth has utilized similar methods during testing in other situations  
18 such as with KPMG in order to skew the results in favor of BellSouth?

19 A: In the day to day operation of the LCSCs, there are LCSC representatives  
20 handling drastically higher numbers of conversions from multiple CLECs.  
21 Because these representatives are not the individuals who participated in the  
22 development of the methods and procedures and the SME who supports  
23 them was not a part of the complicated developmental project team, they do

1 not know what to do when the inevitable problems arise with orders from  
2 CLECs for UNE-Ps. Therefore, the great majority of orders submitted by  
3 CLECs are not handled correctly, efficiently, or effectively. This results in a  
4 complete lack of parity for IDS and other CLECs. This is not just my opinion.  
5 This has been my experience both within and without BellSouth's operations.

6 Q: Do you believe that it was the intention of BellSouth's management to provide  
7 a product to comply with the FCC 319 Remand that essentially did not work? .

8 A: I cannot say that the intention of BellSouth's management was to mislead the  
9 Florida Public Service Commission and the CLEC community concerning this  
10 process. I can say with certainty, however, that the Project Team did not  
11 have adequate time in which to develop a workable "Single C format" for  
12 UNE-P conversions. I can also say with certainty that BellSouth's  
13 management knew this then and has known it since then, and has failed to  
14 remedy the situation in any fashion other than temporary quick fixes at the  
15 request of CLECs.

16 The Project Team was repeatedly told by the Senior Director of the  
17 Project Group, Peggy Caldwell, that the UNE-P process must be rolled-out by  
18 February 17, 2000, even if it was not 100% reliable. It became evident that  
19 the focus was not on developing the product correctly, but rather to simply  
20 have a product that complied as much as possible with the FCC requirements  
21 ready for use by CLECs. Given what the Project Team knew and  
22 communicated to management about the inherent problems with the UNE-  
23 Pprocess, and the limited time we had in which to arrive at a viable solution, I

1 can only reach one conclusion. BellSouth's management was not and is not  
2 serious about correcting the problems the UNE-P process has caused IDS  
3 and other CLECs.

4 Q: Did anyone ever suggest a modification to the Legacy System as a possible  
5 solution?

6 A: Yes. BellSouth's management sent the Project Team back to the drawing  
7 board several times to revisit the development of alternatives to the D & N  
8 process that would require changes to the Legacy System. The concept was  
9 to explore if the Legacy System could be changed to accept and process  
10 UNE-P orders via a different as yet undeveloped process through completion  
11 without service outages or service feature disruptions. However, it was  
12 concluded that the Legacy System simply could not accept any process other  
13 than the D & N to convert UNE-P orders and changes that would allow a  
14 different process to be utilized would not or could not be effected.

15 Q: Can you explain BellSouth's processing of orders to convert telephone  
16 subscribers from BellSouth to a CLEC under a Resale arrangement as  
17 opposed to a UNE-P arrangement?

18 A: There are two scenarios for the conversion of a telephone subscriber's  
19 services from BellSouth to a CLEC under a Resale arrangement. Under the  
20 Resale scenario, a BellSouth retail customer is moving his or her services to  
21 a CLEC who will be reselling BellSouth's local service.

22 The first scenario for a Resale conversion is known as an "as is"  
23 conversion. This conversion simply means that the customer's services will

1 be identical to their services with BellSouth. The second scenario for a  
2 Resale conversion is known as a conversion “as specified.” This means that  
3 the end-user customer requires an addition or deletion of features or lines to  
4 the services they currently receive from BellSouth simultaneously with the  
5 conversion.

6 Each conversion order process begins when a Local Service Request  
7 (LSR) is submitted to BellSouth from a CLEC via one of the BellSouth  
8 electronic interfaces—LENS, EDI, TAG, or ROBOTAG.

9 During an “as is” conversion, BellSouth, acting on a CLEC’s electronic  
10 request, will only have to perform a billing change, on behalf of a subscriber  
11 from BellSouth’s Retail division to the CLEC’s Resale environment. This  
12 function requires entries in only nine fields to complete the switch “as is” to  
13 the CLEC and does not require any intervention from other downstream  
14 groups.

15 The process flow of a new conversion or “as specified” conversion or  
16 switch is essentially the same as an “as is”. The LSR is entered into one of  
17 the BellSouth interfaces mentioned above and the LSR is filtered through  
18 LEO for order validation and LESOG, which generates the order into SOCS.  
19 A Single C (Change) order is the product of an “as is” or “as specified”  
20 conversion order from Retail (BellSouth) to Resale (CLEC) only. The Single  
21 C format uses only one order to convert a customer instead of two orders, in  
22 contrast to the UNE-P conversions which require both a Disconnect order and  
23 a corresponding New Connect order (known as “D & N”). The Single C

1 format ensures that the customer will not lose dial tone during the conversion  
2 from BellSouth. This Single C format is a BellSouth internal process that  
3 BellSouth developed because BellSouth's end users were initially  
4 experiencing loss of service when the Disconnect/New Connect process was  
5 being used during Resale conversions to CLECs. The Single C format was  
6 developed to avoid those types of service disruptions during Retail to Resale  
7 conversions. The Single C format cannot be affected by the CLEC  
8 whatsoever. For these types of orders (Retail to Resale), no BellSouth  
9 downstream systems are queried. This permits the order to "flow" through to  
10 completion without manual intervention, which completely eliminates the  
11 possibility of a disruption of services or features.

12 Q: Will you explain the scenario involved in conversions "as specified," also  
13 known as "new conversions," under a Resale arrangement?

14 A: Yes. In order to process an order for conversion "as specified" or a "new  
15 conversion," the CLEC must provide BellSouth all of the information that the  
16 customer wants changed and the information that the CLEC requires for the  
17 account. These orders have to be done at line level, which means that every  
18 line must be addressed by the LSR. When the LSR is submitted by the  
19 CLEC, the LSR will first enter the OSS system referred to as "LEO" for order  
20 validation in order to complete an up-front edit. The LEO system reviews the  
21 order for specific restrictions that would disallow the LSR from flowing through  
22 to completion.

1           If the LSR encounters a restriction, such as an incorrect or missing  
2 telephone number, Purchase Order Number (“PON”) number, or other critical  
3 information that must be on every LSR, LEO will fatally reject the LSR and the  
4 CLEC must resubmit the LSR to correct the error. This edit function will  
5 continue indefinitely with every submission of an LSR or supplemental LSR  
6 until it has been entirely corrected. If LESOG is required to generate an  
7 order, the request is dropped to the LCSC for completion. The LCSC is  
8 required to review the entire order for accuracy when initially submitted by the  
9 CLEC and all clarifications are required to be made with the first order review  
10 in order to avoid repetitive submissions of the same LSR. However, using the  
11 current process, it is not unusual to have an order “kicked-back” for  
12 clarification several times before the order flows through to completion  
13 because BellSouth’s LCSCs do not comply with the requirement that all  
14 clarifications must be made on the first order review. Based on my direct  
15 experience working with BellSouth’s LCSCs over the last year in my capacity  
16 as the Assistant Vice President of Local Operations for IDS, I know personally  
17 that the LCSCs are not following the Methods and Procedures established for  
18 their proper operation.

19           Once an LSR passes through LEO, it enters the OSS system known  
20 as “LESOG” and LESOG will assign the due date for the service order to be  
21 completed and automatically generate an order in SOCS reflecting whatever  
22 changes were requested and an FOC is returned to the CLEC.

23 Q:    What happens when a service order flows to completion?

1 A: Ideally, the conversion is completed on the due date and a completion notice  
2 is sent to the CLEC regarding the completion. The Customer Service Record  
3 (“CSR”) should be updated to reflect the conversion within 72 hours of  
4 completion. The CSR update is further verification that the customer’s  
5 services have been converted.

6 Q: Please describe the conversion of service orders from BellSouth Retail or  
7 CLEC Resale to UNE-P.

8 A: The order process flow for conversions of service orders from BellSouth  
9 Retail or CLEC Resale to UNE-P should be the same as that for Retail to  
10 Resale in that the systems and procedures are the same. However, in order  
11 to convert a subscriber’s services from BellSouth Retail or CLEC Resale to  
12 UNE-P “as is” with the only difference being a change to measured service  
13 from flat-rate, BellSouth requires that every entry on the CSR be addressed  
14 from the listing section through the Service and Equipment section (S&E).  
15 This requirement in and of itself is considerably more cumbersome than in a  
16 Retail to Resale “as is” conversion, especially for a multi-line account  
17 conversion. In addition, BellSouth refuses to allow conversions to UNE-P “as  
18 is” as it does for conversions from Retail to Resale. BellSouth refuses to  
19 permit an “as is” conversion to UNE-P even when no changes are requested  
20 by the end user on his account. For this reason, every single UNE-P order is  
21 subject to being queried by all of BellSouth’s systems, including RCMAG and  
22 AFIG (Assignment Facility Inventory Group). This results in unnecessary  
23 intervention by other BellSouth departments and the possibility of a

1 disconnection without a corresponding new connection (D & N) increases  
2 substantially.

3 Q: If the process for converting UNE-P “as is” orders is essentially the same as  
4 Retail to Resale “as is” orders, why do customers experience the  
5 disconnection of their services, as well as other disruptions?

6 A: Retail to Resale “as is” orders that are processed using the Single C format  
7 do not drop down to BellSouth’s downstream systems for input and as a  
8 result, they avoid RCMAG and AFIG altogether. UNE-P “as is” orders go  
9 through RCMAG and AFIG. These two systems are for translations and  
10 cable facility assignment and should not required for UNE-P “as is” orders,  
11 with the exception of changing the service from Flat Rate to Measured Rate.

12 In addition, the BellSouth service representatives use internal OSS  
13 systems known as “SONGS” and “DOE” which allow them to perform online  
14 edits and correct BellSouth’s orders in real time so that BellSouth’s own  
15 orders flow through the system immediately. BellSouth has refused to permit  
16 CLECs parity by providing access to these established OSS systems.

17 If a CLEC makes a mistake on the LSR, the LCSC or LEO sends the  
18 order back to the CLEC for “clarification” creating a time lag for the order to  
19 complete that BellSouth does not experience. A conversion from Retail or  
20 Resale “as is” to UNE-P must be handled in the same manner as that used  
21 for Retail to Resale “as specified.” If this is not done, the likelihood of end-  
22 user outages or disruption of service features is very high and increases in  
23 relation to the number of lines being converted.

1 Q: Does the intervention of RCMAG and AFIG in the processing of CLEC orders  
2 necessarily cause a disruption of service?

3 A: No. However, in my experience, the outages that we have encountered were  
4 caused by the intervention of one of those two departments or the LCSC. If  
5 the LCSC omits necessary entries on the service order, that will definitely  
6 cause downstream systems to handle the order incorrectly thereby causing  
7 outages that are completely out of the control of the CLEC.

8 Q: What is your recommendation to the Florida Public Service Commission as  
9 the solution to the serious lack of parity BellSouth has provided IDS in the  
10 provision of OSS, UNEs, and UNE-Ps? What does IDS want the Florida  
11 Public Service Commission to order BellSouth to do?

12 A: It is my recommendation that the only way to assure IDS parity in BellSouth's  
13 provision of OSS and UNEs and UNE-Ps is for the Florida Public Service  
14 Commission to order BellSouth to provide IDS direct access to BellSouth's  
15 DOE and SONGS systems. This would provide parity. Short of this, IDS nor  
16 any other CLEC will ever have parity in BellSouth's provision of OSS and  
17 UNEs and UNE-Ps.

18 Q: Does this conclude your testimony?

19 A: Yes.

Rebecca B. Wellman  
123 Luckie Street N.W.  
Loft 1507  
Atlanta, GA 30303

**July 2000-** IDS TELCOM – Asst. Vice President Local Service

Responsibilities: Develop and maintain operational policies and procedures  
Provisioning of end user requests for IDS service  
Change Control Process, OBF, UNE-P User Group

**January 1970-  
July 2000** BellSouth Telecommunications, Inc.

Responsibilities  
And Titles:

Operator – Handle customer requests for local and long distance service

Administrative Assistant – Scheduling; payroll; filing

Marketing Assistant – Compile sales reports; analyze sales data

Service Representative – Issue service orders per customer requests; sell products and services; make billing arrangements; collect final bills

Maintenance Administrator – Analyze customer trouble tickets; test lines and equipment; verify translations; determine final steps necessary for repair

Repair Service Supervisor – Supervise repair attendants; monitor repair attendants as they take customer trouble reports; analyze data and spot trends

Load Control Manager – Dispatch technicians to repair and install customer lines; set repair and installation appointments based on load forecasts; handle escalations

Staff Support Manager – Participate in development teams for products I support; write methods and procedures for service representatives in the LCSC; support training initiatives on UNE-P in the LCSC and Customer Support Manager group

Education: Graduate Sandy Springs High School, 1965  
University of Georgia, 1965-1966