# MCWHIRTER REEVES ORIGINAL

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

August 9, 2001

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDGO 32301 TALLAHASSEE, FLORIDG

### VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re: Docket No.: 960786-TL

Dear Ms. Bayo:

On behalf of XO Florida, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

▶ XO Florida, Inc.'s Notice of Filing Affidavits Regarding OSS Problems.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnoi

Sincerely,

Willis Gordon Durgmen

Vicki Gordon Kaufman

APP	
CAF VGK/bae	
CMPEnclosure	
COM_5	
CTR	RECEIVED & FILED
ECR	10.0
LEG	mar
OPC	FPSC-BUREAU OF RECORDS
PAI	
RGO	
ara )	

DOCUMENT NUMBER-DATE

09707 AUG-98

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth	)	
Telecommunications, Inc.'s entry into	)	
interLATA services pursuant to	)	Docket No. 960786-TL
Section 271 of the Federal	)	
Telecommunications Act of 1996.	)	
	)	
	)	
In re: Petition of Competitive Carriers	)	Docket No. 981834-TP
for Commission action in support of	)	
local competition in BellSouth	)	
Telecommunications, Inc.'s service	)	Filed: August 9, 2001
territory.	)	
•	)	

### XO FLORIDA, INC.'S NOTICE OF FILING AFFIDAVITS REGARDING OSS PROBLEMS

XO Florida, Inc. (XO) gives notice that it is filing as attachments hereto the Affidavits of James Tadlock (Attachment 1) and Elina Padfield (Attachment 2) dated August 7, 2001.

These Affidavits detail (a) problems that XO is experiencing with BellSouth's Operations Support Systems (OSS) including (1) delay in interface upgrades (2) delay in OSS enhancements (3) inadequate documentation and (4) frequent outages of LENS and EDI.

XO would have submitted the information contained in these affidavits as prefiled testimony in the BellSouth 271 docket (Docket No. 960786-TL). However, the Commission has ruled that the adequacy of BellSouth's OSS will not be considered during the formal hearings in that docket, but instead will be considered via KPMG's Third Party Test and a workshop process following the submission of KPMG's final report. These 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 the serious

09707 AUG-95

FPSC-COMMISSION CLERK

problems that XO is experiencing with systems and processes that are being evaluated in the Third Party Test.

Vicki Gordon Kaufman

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A. 117 South Gadsden Street Tallahassee, Florida 32301

(850) 222-2525 (telephone) (850) 222-5606 (fax)

vkaufman@mac-law.com

Henry C. Campen, Jr. Parker, Poe, Adams & Bernstein First Union Capital Center 150 Fayetteville Street Mail, S-1400

Post Office Box 389

Raleigh, NC 27602

(919) 890-4145 (telephone)

(919) 834-4564 (fax)

henrycampen@parkerpoe.com

Dana Shaffer

XO Communications, Inc.

105 Molloy Street, Suite 300

Nashville, Tennessee 37201-2315

(615) 777-7700 (telephone)

(615) 345-1564 (fax)

dana.shaffer@xo.com

Attorneys for XO Florida, Inc.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing XO Florida, Inc.'s Notice of Filing Affidavits Regarding OSS Problems has been furnished by (\*) hand delivery or by U. S. Mail on this <u>9th</u> day of August, 2001, to the following:

(\*)Beth Keating Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Jeremy Marcus
Blumenfeld & Cohen
1625 Massachusetts Avenue, NW
Suite 300
Washington DC 20036

Nancy B. White c/o Nancy Sims BellSouth Telecommunications, Inc. 150 South Monroe Street Suite 400 Miami Florida 32301

James Falvey
e.spire Communications
131 National Business Parkway
Suite 100
Annapolis Junction, MD 20701

Michael Gross
Florida Cable Telecommunications
Association
246 E. 6th Avenue
Tallahassee, Florida 32303

Kim Caswell GTE Post Office Box 110 FLTC0007 Tampa, Florida 33601 Richard Melson Post Office Box 6526 Tallahassee, Florida 32314

Scott Sapperstein Intermedia One Intermedia Way MC FLT-HQ3 Tampa, Florida 33619-1309

Donna McNulty 325 John Knox Road Suite 105 Tallahassee, Florida 32303

Floyd Self/Norman Horton Messer Law Firm Post Office Box 1876 Tallahassee, Florida 32302

Pete Dunbar/Karen Camechis Pennington Law Firm Post Office Box10095 Tallahassee, Florida 32301

Susan S. Masterton Sprint Post Office Box 2214 MC: FLTLH00107 Tallahassee, Florida 32316-2214

Ken Hoffman Rutledge Law Firm Post Office Box 551 Tallahassee, Florida 32302-0551 Andrew Isar Ascent 3220 Uddenberg Lane, Suite 4 Gig Harbor, WA 98335

Matthew Feil Florida Digital Network, Inc. 390 North Orange Avenue Suite 2000 Orlando, Florida 32801

Angela Green, General Counsel Florida Public Telecommunications Assoc 125 S. Gadsden Street Suite 200 Tallahassee, Florida 32301-1525

Patrick Wiggins Katz, Kutter Law Firm 12th Floor 106 East College Avenue Tallahassee, Florida 32301

John Marks, III Knowles Law Firm 215 S. Monroe Street Suite 130 Tallahassee, Florida 32301

Scheffel Wright Landers Law Firm Post Office Box 271 Tallahassee, Florida 32302

Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street Suite 812 Tallahassee, Florida 32399-1400

Rodney L. Joyce 600 14th Street, N.W. Suite 800 Washington DC 20005-2004 John Kerkorian MPower 5607 Glenridge Drive, Suite 300 Atlanta, GA 30342

CWA (Orl) Kenneth Ruth 2180 West State Road 434 Longwood, FL 32779

ITC^ DeltaCom Nanette S. Edwards 4092 South Memorial Parkway Huntsville, AL 35802-4343

Network Access Solutions Corporation 100 Carpenter Drive, Suite 206 Sterling, VA 20164

Swidler & Berlin Richard Rindler/Michael Sloan 3000 K. St. NW #300 Washington, DC 20007-5116

Suzanne F. Summerlin IDS Telcom L.L.C. 1311-B Paul Russell Road, Suite 201 Tallahassee, Florida 32301

Jim Lamoureux AT&T Communications, Inc. 1200 Peachtree Street, NE Room 8068 Atlanta, GA 30309

Ulli Hordon Drufmon Vicki Gordon Kaufman

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Service Territory	)	Docket No. 981834-TP
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

### AFFIDAVIT OF JAMES TADLOCK ON BEHALF OF XO FLORIDA, INC.

James Tadlock, being first duly sworn, deposes and says:

- 1. I am James Tadlock, Manager, Enterprise Engineering, for XO Communications, Inc. ("XO"). My business address is 512 West 4<sup>th</sup> Street, Edgerton, Kansas 66021.
- 2. In my current position, I am responsible for accurate and timely delivery of electronic messages to and from XO trading partners, including BellSouth.
- 3. I have a Bachelors degree in Computer and Information Science from Troy State University, approximately twenty (20) years in the data processing field, and over ten years in the electronic commerce area with concentrated expertise in Electronic Data Interchange ("EDI"). My background includes nearly four years of experience in the telecommunications industry, two of which were as a contractor at BellSouth's EDI Central in Birmingham, Alabama. I have extensive knowledge and understanding of the LSOG ordering and provisioning process as it relates to EDI.

4. My affidavit demonstrates that BellSouth does not provide CLECs with

nondiscriminatory access to its operational support systems ("OSS") and functions as

required by the FCC and this Commission.

A. BellSouth Has Delayed Implementation of EDI Interface Upgrades.

5. BellSouth has taken the position that some CLECs have chosen not to

upgrade their EDI and TAG ordering interfaces and that flow-through enhancements that

occurred with these new releases and those subsequent will not be realized in these

CLECs' flow-through percentages. This is certainly not the case as to XO.

6. XO chose to upgrade its EDI upgrade last December to Release 6.0 (also

referred to as OSS99). However, XO has been stymied by repeated BellSouth delays.

The flow-through enhancements BellSouth references will not be realized by XO because

of BellSouth delays. These delays have cost XO money and reduced XO's productivity.

7. XO cannot implement new releases of EDI until BellSouth certifies XO

for a new release through a series of tests - Physical Connectivity, Validity, Syntax, and

Production Verification (the "Certification Tests").

8. In August 200, XO requested BellSouth to schedule testing for November

2000 for the upgrade to EDI Release 6.0. However, in a Carrier Notification

(SN91082007) dated October 23, 2000, BellSouth advised XO and other CLECs that

testing would be suspended until December 15, 2000. BellSouth also separately notified

XO that it would be shutting down all testing during the month of December 2000 and

part of January 2001.

#225983

Docket Nos. 960786-TL, 981834-TP Affidavit of James Tadlock Attachment 1

Page 2 of 8

2

9. We were concerned about this delay in testing because XO was anxious to implement EDI Release 6.0. This new release would eliminate a lot of manual

processing of XO orders internal to BellSouth.

10. BST did not open its test windows for EDI Release 6.0 again (for any

CLECs) until the end of March 2000. At this point, XO was already 3 months behind the

schedule we had adopted for implementation of the EDI upgrade.

11. In early April 2001, XO requested that BellSouth schedule XO for the

Certification Tests. BellSouth advised XO that it was fourteenth on the list for testing

and that it would be August or later before BellSouth could schedule the testing. XO was

forced by BellSouth's schedule to further delay implementation of EDI Release 6.0.

Because of BellSouth's delays, XO had to put this project on hold.

12. XO lobbied with BellSouth weekly for an expedited resumption of the

Certification Tests. Finally, in early May, BellSouth informed XO that several CLECs

had dropped off the test list and that BellSouth could schedule XO's Certification Testing

sometime in early June. We requested June 18th. BellSouth told us the earliest they

could schedule XO was August 1st. We ultimately persuaded BellSouth to permit XO to

begin the Certification Tests on July 2, 2001. The test began on July 16, 2001 and is now

underway.

13. If testing goes smoothly, the earliest XO can reasonably expect to

implement EDI Release 6.0 is August 1, 2001. Based on our experience to date, we have

no reason to expect that the testing will go smoothly.

14. Indeed, on July 10, 2001, BellSouth informed XO that BellSouth was

having problems with its EDI interface. This has delayed testing, and it is almost assured

Docket Nos. 960786-TL, 981834-TP Affidavit of James Tadlock Attachment 1 Page 3 of 8

#225983

that XO will not be able to complete its Certification Testing within the inadequate time frame BellSouth has allowed.

15. The industry average interval for completion of Certification Testing is 6 weeks. BellSouth has given XO only a 3-week test window. XO has maintained an open issues log with BellSouth on EDI Release 6.0 since August 2000. Many of these issues remain open and unresolved, even though XO's Certification Testing is now underway. With these issues unresolved, it is almost certain that XO will not be able to complete its testing in the now long-delayed 3-week window BellSouth has allowed.

16. Consequently, further BellSouth delays can be expected. Even under the most optimistic scenario, BellSouth's delays have deprived XO of the benefits of EDI Release 6.0 for a minimum of 6 months. Due to BellSouth delays, the test that was to be completed by August 1 is delayed until August 10.

17. XO has been deprived of the benefits because of BellSouth's delays and inefficiency.

### B. BellSouth Has Delayed Related OSS Enhancements.

18. XO is currently communicating with BellSouth's EDI gateway by a modem connection. As a part of its migration to EDI Release 6.0, XO plans to convert to a dedicated line connection (CONNECT:Direct<sup>TM</sup>). This form of connection will be much less expensive and more efficient for XO than the current modem connection. To facilitate this conversion, in May 2001, XO requested BellSouth to provide XO with sample computer code so XO programmers could begin writing the computer code necessary to support this application.

19. BellSouth agreed on a Unix operating system platform connection and

provided XO with sample code for Unix on May 8, 2001. XO completed the

programming using the Unix code. With the code complete, XO was ready to begin

testing the connection. Another test - an Application Connectivity Test - is required to

verify communication is properly established between BellSouth and XO. The

Application Connectivity Test was conducted successfully on May 16, 2001.

20. Subsequently, BellSouth informed XO that the Unix platform was not

working correctly and switched XO off the Unix platform to a new operating system -

MVS. Significant additional effort was required by XO to accommodate this change.

This change added further delay to the processes and set XO back four weeks in our

Application testing efforts.

C. BellSouth's OSS Documentation is Inadequate.

21. BellSouth has also taken the position that a significant number of users of

TAG and EDI, combined with the substantial usage and integration of the pre-ordering

and ordering interfaces, clearly demonstrates the adequacy of BellSouth's documentation

for CLECs. I could not disagree more.

22. BellSouth's documentation on EDI Release 6.0 is inadequate and unclear.

Most of the issues on the open issues log referenced in paragraph 15 of this affidavit are

the result of the inadequacy of BellSouth's documentation. XO has frequently had to

request samples of data, clarification of BellSouth business rules, and explanations of

field data usage for the transactions for which code must be written. The inadequacy of

BellSouth's documentation is another factor contributing to the delay in XO's ability to

realize the benefits of EDI Release 6.0.

Docket Nos. 960786-TL, 981834-TP Affidavit of James Tadlock Attachment 1 Page 5 of 8

#225983

5

### D. BellSouth's Delays Are Resulting in Lost XO Revenues and Productivity.

23. XO has every incentive to implement this upgrade as quickly as possible. The current version of EDI severely limits XO's ability to order unbundled network elements ("UNEs") efficiently and cost effectively. In turn, these limitations of BellSouth's OSS limit XO's ability to compete against BellSouth. Some of these limitations are summarized below:

- BellSouth cannot process orders for unbundled DS-1 loops through the current version of EDI. Virtually all of the DS-1 loops XO orders to transport local service/data to customers are provisioned as UNEs. Currently all UNE DS-1 loops have to be ordered by fax on a manual local service request ("LSR").
- Orders to BellSouth for xDSL loops and for ISND/BRI loops cannot be submitted electronically. Currently all such orders are ordered by fax on a manual LSR.
- BellSouth cannot electronically process orders where customers are porting some numbers and disconnecting others. Under BellSouth's current process, XO must either port all the numbers, then disconnect the ones the customer does not want after conversion (which is a records nightmare), or order via fax on a manual LSR.
- BellSouth cannot currently process complex directory listings through EDI (i.e., customers who have caption listings). These listings must be ordered via fax on a manual LSR.
- 24. XO will be able to perform all of the functions described above (with the possible exception of xDSL orders due to BellSouth limitation) when EDI Release 6.0 is operational.

25. BellSouth's delay in allowing XO to implement EDI Release 6.0 is costing

XO tens of thousands of dollars. Ordering via faxed manual LSRs is nearly three times

more expensive for XO than electronic ordering. The cost to XO to process a fax order is

\$42; the cost of an EDI order is \$18. To illustrate the significance of these savings.

consider that in a four-month period last fall, XO submitted 8793 orders to BellSouth by

fax. Had XO been able to submit those orders electronically, the savings to XO just for

four months would have been approximately \$435,762.

26. The circumstances described above illustrate that BellSouth is not

providing CLECs with nondiscriminatory access to BellSouth's OSS. In turn,

BellSouth's discrimination is adversely affecting XO's ability to compete with BellSouth.

E. BellSouth Testing Has Impaired XO's Order Processing.

27. In early February, BellSouth informed XO that it would have to conduct a

mandatory Application Connectivity Test of its own EDI translator system with all

CLECs using EDI. This test was unrelated to the EDI Release 6.0 certification testing or

XO's Application Connectivity Testing and was designed solely for BellSouth's benefit.

BellSouth informed XO that this test would last one hour, during which time XO's

existing EDI interface would be down. XO also would not be able to submit orders

electronically to BellSouth during the one-hour test period.

28. We scheduled our Provisioning Manger, Kristen Hudson, and another

member of our Application Support Team to be at BellSouth's offices at 6:00 AM CST to

conduct this test. The early hour of the test was designed to minimize interruption of

7

XO's order processing.

Docket Nos. 960786-TL, 981834-TP Affidavit of James Tadlock

Attachment 1 Page 7 of 8

#225983

29. Instead of the one hour BellSouth promised, the testing lasted for nearly five hours. After five hours, XO requested BellSouth to terminate the test because it had disabled XO's ability to process any orders for customers. BellSouth requested one more hour of testing, and the testing was completed by 12:00 PM CST. The testing lasted a total of six hours, costing XO a half-day's worth of order processing time.

I hereby swear that the foregoing is true and correct to the best of my information and belief.

James Tadlock

Subscribed and sworn to before me this \_\_\_\_\_ day of August, 2001.

Notary Public

My commission expires: SEPT 19, 2002

FITA M. MOORE Maley Pedde, State of Heapto My Comm. Expires 9-19-2002

XO Communications 271/Affidavits/Tadlock FL OSS Docket Affidavit (1).doc

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Service Territory	) ) )	Docket No. 981834-TP
Consideration of BellSouth Telecommunications, Inc.'s Entry into InterLATA Services Pursuant to Section 271 of the Federal Telecommunications Act of 1996	)	Docket No. 960786

### AFFIDAVIT OF ELINA PADFIELD ON BEHALF OF XO COMMUNICATIONS

Elina Padfield, being first duly sworn, deposes and says:

- 1. I am a Senior Manager for XO Communications, Inc. ("XO"). My business address is 105 Molloy St., Suite 300, Nashville, Tennessee 37201.
- 2. I have nearly twenty years of experience in the telecommunications industry. I spent fourteen years with MCI Telecommunications, nine of those as a provisioner. I was later promoted to manager of the Provisioning Department. I have been employed with XO for five years, three years as the Regional Provisioning Manager and one and a half years as the manager of Provisioning Support for the Region. I am presently Senior Manager of the South Region Disconnect Center.
- 3. My affidavit demonstrates that BellSouth's operations support systems ("OSS") are unstable and unreliable.
- 4. XO uses BellSouth's electronic Local Exchange Navigation System ("LENS") interface for preordering functions such as verifying a customer's address. XO also uses LENS to order resold BellSouth services. Most of XO's customers are served with a combination of XO's own facilities and unbundled local loops and other UNEs purchased from BellSouth. XO

uses the EDI interface to order those loop types for which the BellSouth system supports electronic ordering.

5. BellSouth's LENS and EDI interfaces are frequently partially or totally out of service ("outages"). For the months of April, May, June and July, BellSouth reported a total of 61 LENS outages to XO and a total of 32 EDI outages. I have attached to my affidavit as **Exhibit EP-1** a spreadsheet listing all of these outages, including the outage number assigned by BellSouth. These outages are first reported to XO by e-mail. The outages are also ultimately posted to BellSouth's interconnection website. BellSouth reports the time the outage was reported, the date it was verified and the date the outage was resolved. Unfortunately, all three times are not always included. In some cases the times included on the e-mail received from BellSouth will be different than the time posted on the website.

6. Over this four-month period, LENS outages averaged over two hours and ranged from a low of 12 minutes to a high of over 24 hours. Over this period, EDI outages averaged over six and a half hours and ranged from a low of 16 minutes to a high of over two days. These statistics are based on the outages for which BellSouth reported a resolution time.

7. These outages severely limit XO's ability to access BellSouth's UNEs. For instance, when LENS is down, XO cannot:

- Verify customer addresses,
- Pull customer service records,
- Order resold services, or
- Make feature changes for customers using resold BellSouth services.

As a result, XO's orders are delayed until the outage is resolved, and the dates by which XO is able to commit to service delivery are pushed out.

- 8. When there is an EDI outage, XO cannot order unbundled local loops over which most of XO's customers are served. When there is a delay due to an outage, XO is often unable to meet the customer's requested delivery date for service. Sometimes, we can still meet the due date, but it requires XO to expedite the order with BellSouth. However, BellSouth imposes an additional charge for an expedited order. As a result, XO has to pay more for a UNE because of a BellSouth system failure. In some cases, BellSouth will refuse to expedite an order.
- 9. The instability and unreliability of BellSouth's OSS impedes XO's access to UNE's and, thereby, XO's ability to compete with BellSouth.

I hereby swear that the foregoing is true and correct to the best of my information and belief.

Elina Padfield

Subscribed and sworn to before me This 10th day of August, 2001.

Notary Public

My commission expires:

July of Control

Jadfuld

### LENS Outages (April-July 2001)

	Ticket No.	Source	Date	10.70%	Verified Resolved	Time Elapsed (Min.)
1	2093	BellSouth Website	07/26/01	5:45 pm	6:08 pm	23
2	2087	BellSouth Website	07/26/01	8:23 am	8:45 am	12
3	2077	BellSouth Website	07/24/01	4:11 pm	5:21 pm	70
4	2071	BellSouth Website	07/23/01	10:28 am	11:45 am	77
5	2063	BellSouth Website	07/19/01	12:40 pm	3:30 pm	170
6	2060	BellSouth Website	07/19/01	9:40 am	11:20 am	100
7	2059	BellSouth Website	07/18/01	5:05 pm	5:42 pm	37
8	2056	BellSouth Website	07/18/01	9:48 am	11:35 am	107
9	2053	BellSouth Website	07/17/01	3:21 pm	4:44 pm	83
10	2051	BellSouth Website	07/17/01	7:20 am	9:00 am	100
11	2046	BellSouth Website	07/13/01	4:55 pm	5:26 pm	31
12	2043	BellSouth Website	07/13/01	12:42 pm	2:23 pm	111
13	2038	BellSouth Website	07/11/01	11:36 am	3:21 pm	225
14	2034	Carrier Notification	07/11/01	2:01 pm	4:00 pm	119
15	2030	BellSouth Website	07/11/01	7:16 am	8:50 am	94
16	2026	BellSouth Website	07/10/01	12:32 pm	2:55 pm	143
17	2011	BellSouth Website	07/05/01	8:45 am	10:08 am (for NC) (SC still being investigated)	83
18	2006	BellSouth Website	07/03/01	2:16 pm	4:10 pm	114
19	2000	BellSouth Website	07/02/01	1:18 pm	1:38 pm	20
20	1987	BellSouth Website	06/27/01	8:40 am	11:35 am	175
21	1981	Carrier Notification	06/26/01			
22	1974	BellSouth Website	06/23/01	3:35 pm	4:10pm	35
23	1967	BellSouth Website	06/21/01	1:54 pm	3:40 pm	106
24	1960	Carrier Notification	06/19/01	3:00 pm	3:42 pm	42
25	1949	BellSouth Website	06/18/01	7:20 am	12:04 pm	284
26	1954	BellSouth Website	06/18/01	3:23 pm	4:05 pm	42

Docket Nos. 960786-TL, 981834-TP Affidavit of Elina Padfield Attachment 2 Page 4 of 8

<b>**</b>	Ticket No.	相談 ひがいは あらし アルノス ヴラバリア しょうかい コンド	Date	Reported	Verified	Resolved-	Time Elapsed
27	1948	BellSouth Website	06/16/01			4:17 pm	(Min.) 43
28	1937	Carrier Notification	06/10/01	1:52 pm		4:17 pm	143
29	1936	Carrier Notification	06/12/01	10:56 pm		12:05 pm	69
30	1935	BellSouth Website	06/12/01	2:45 pm		3:30 pm	45
31	1932	BellSouth Website	06/08/01	12:10 pm		1:30 pm	80
32	1925	BellSouth Website	06/06/01	4:44 pm	<u> </u>	6:41 pm	117
33	1920	Carrier Notification	06/05/01	3:15 pm		4:00 pm	45
34	1911	Carrier Notification	06/03/01	3:35 pm		4:25 pm	50
35	1905	BellSouth Website	05/30/01	5:22 pm		6:53 pm	91
36	1901	Carrier Notification	05/28/01	7:29 am		10:36 am	187
37	1896	Carrier Notification	05/28/01	12:26 pm		2:04 pm	98
38	1895	Carrier Notification	05/24/01	10:14 am		11:00 am	98 46
39	1891	Carrier Notification	05/24/01			Not on BellSouth	40
39	1091	Carrier Nonneadon	03/24/01	2:50 pm		Website	
40	1886	Carrier Notification	05/21/01	10:47 am		Not on BellSouth Website	
41	1889	BellSouth Website	05/21/01	2:38 pm		4:20 pm	102
42	1862	Carrier Notification	05/17/01	8:40 am		9:44 am	64
43	1875	BellSouth Website	05/17/01	7:34 pm		8:13 pm	39
44	1843	BellSouth Website	05/09/01	7:30 am		9:50 am	140
45	no#	Carrier Notification	05/09/01	8:20 am	8:40 am	Not on BellSouth	
						Website	
46	1832	BellSouth Website	05/07/01	10:09 am		05/08 – 11:06 am	1497
47	1818	BellSouth Website	05/01/01	4:50 pm		11:01 pm	371
48	1820	BellSouth Website	05/02/01	10:34 am		11:34 am	60
49	1816	Carrier Notification	05/01/01	11:07 am		Not on BellSouth	
			I			Website	
50	1789	Carrier Notification	04/24/01		11:21 am	Not on BellSouth Website	
51	1796	BellSouth Website	04/23/01	10:50 am		11:55 am	65

	Ticket No.	Source	Date	Reported	Verified	Resolved	Time Elapsed
							(Min.)
52	1767	Carrier Notification	04/13/01	1:30 pm		2:30 pm	60
53	1802	Carrier Notification	04/13/01	11:13 am		Not on BellSouth	
						Website	
54	1768	BellSouth Website	04/13/01	4:45 pm		6:41 pm	116
55	1753	BellSouth Website	04/09/01	9:23 am		9:47 am	24
56	1752	BellSouth Website	04/08/01	8:30 am		12:30 pm	240
57	1749	BellSouth Website	04/06/01	12:11 pm		6:00 pm	349
58	1747	BellSouth Website	04/05/01	5:54 pm		6:20 pm	26
59	1737	BellSouth Website	04/03/01	9:25 am		10:25 am	60
60	1729	BellSouth Website	04/02/01	7:04 am		9:00 am	116
61	1728	BellSouth Website	04/01/01	9:34 am		10:30 am	56
						AVERAGE	125.67
						Low = 12 min.	

### **EDI Outages (April-July 2001)**

	Jiffeltu Nic			Reposited		Ravolved	Bine Oliped (Min)
1	6538	BellSouth Website	07/19/01		9:05 am	1:10 pm	245
2	6493	BellSouth Website	07/16/01		3:55 pm	No resolution time	
						stated – estimated	
						resolution on	
						afternoon of 07/19/01	
3	2010	BellSouth Website	07/04/01	10:00 am		2:16 pm	256
4	2007	BellSouth Website	07/03/01	11:01 pm		6:00 am (07/04)	419
5	6148	Carrier Notification	06/18/01		11:41 am	No resolution time	
						stated	
6	1938	Carrier Notification	06/12/01	4:35 pm		8:24 pm	229
7	1923	BellSouth Website	06/06/01	3:05 pm		06/09 – 12:15 pm	4150
8	1906	BellSouth Website	05/31/01	10:47 am		11:07 am	20
9	1898	BellSouth Website	05/29/01		3:15 pm	No resolution time	2895+
						stated - 5/31/01 at	
						3:30 still investigating	
10	1889	Carrier Notification	05/22/01	12:38 pm		Not on BellSouth	
						Website	
11	1891	BellSouth Website	05/22/01	2:50 pm		6:48 pm	238
12	1885	Carrier Notification	05/21/01	10:00 am		Not on BellSouth	
						Website	
13	1883	Carrier Notification	05/21/01	7:00 am		Not on BellSouth	
						Website	
14	1884	BellSouth Website	05/21/01	8:53 am		9:45 am	52
15	1879	Carrier Notification	05/20/01	3:22 pm		6:17 pm	175
16	1882	BellSouth Website	05/20/01	3:50 am		4:25 am	35
17	1875	Carrier Notification	05/18/01	7:34 pm		Not on BellSouth	
						Website	
18	1866	BellSouth Website	05/16/01	3:05 pm		5:45 pm	160
19	1863	BellSouth Website	05/15/01	10:05 am		11:45 am	100

Docket Nos. 960786-TL, 981834-TP Affidavit of Elina Padfield Attachment 2 Page7 of 8

	TifdkötiNiis	Saurce	Date	Reported	Venifei		Trime Elapsed (Min.)
20	1861	BellSouth Website	05/14/01		3:27 pm	5:49 pm	142
21	1852	BellSouth Website	05/12/01	6:00 am		6:29 am	29
22		Carrier Notification	05/08/01	12:54 pm	1:14 pm	Not on BellSouth	
						Website	
23	1838	BellSouth Website	05/08/01	8:20 am		8:36 am	16
24	1825	BellSouth Website	05/03/01	12:54 pm		1:23 pm	29
25	1820	Carrier Notification	05/02/01	10:34 am	10:54 am	Not on BellSouth	
						Website	
26	5592	Carrier Notification	04/27/01	4:08 am	4:19 am	4:39 am	31
27	1804	Carrier Notification	04/26/01	4:23 pm	4:43 pm	Not on BellSouth	
1			ļ			Website	
•						5:23 pm	41
29	1802	Carrier Notification	04/25/01	11:13 am	11:33 am	Not on BellSouth	
		1,	İ	<u> </u>	l	Website	
30	5581	BellSouth Website	04/25/01	2:06 pm	•	5:40 pm	214
31	5572	BellSouth Website	04/24/01		2:30 pm	7:50 pm	320
32	1751	BellSouth Website	04/07/01	1:30 pm	2:05 pm	04/08 - 6:19 pm	1729
						AVERAGE	392.27
						High = 2895 min.	
] _						Low = 16 min.	