

1                                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                                   REBUTTAL PANEL TESTIMONY OF  
3                                   KEN L. AINSWORTH, CLAUDE P. MORTON AND LINDA W. TATE  
4                                   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
5                                   DOCKET NO. 010740-TP  
6                                   AUGUST 27, 2001

7  
8 Q.   MR. AINSWORTH, PLEASE STATE YOUR FULL NAME, YOUR  
9       BUSINESS ADDRESSES, AND YOUR POSITION WITH BELLSOUTH  
10      TELECOMMUNICATIONS, INC. ("BELLSOUTH").

11  
12 A.   My name is Ken L. Ainsworth. My business address is 675 W. Peachtree  
13      Street, Atlanta, Georgia 30305. I am a Director - Interconnection Operations  
14      for BellSouth. I have served in my present position since December 1997.

15  
16 Q.   MR. AINSWORTH, DID YOU PREVIOUSLY FILE DIRECT TESTIMONY  
17      IN THIS PROCEEDING ON AUGUST 20, 2001?

18  
19 A.   Yes.

20  
21 Q.   MR. AINSWORTH, IN REVIEWING YOUR DIRECT TESTIMONY THAT  
22      WAS FILED ON AUGUST 20, 2001, IS THERE ANYTHING THAT NEEDS  
23      TO BE CLARIFIED?

24  
25

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1 A. Yes. In responding to the question on page 5 concerning end users affected by  
2 the bulk ordering process who may return to BellSouth, the following  
3 clarifications need to be made to my direct testimony. My answer on page 5 at  
4 lines 15 through 24 should be replaced in its entirety with the following:

5  
6 Not directly, but I have reviewed a report that indicates that some IDS  
7 disconnect orders for customers returning to BellSouth were issued during the  
8 May 2000 period. These orders used one of the three disconnect reason codes.  
9 One of the reason codes was "CB". The CB code is used when BellSouth  
10 disconnects a UNE provided to an ALEC and then BellSouth provides service  
11 to the end user whose service was provided over that UNE. The second reason  
12 code used was "RB" which means an end user to whom IDS had provided  
13 service under the resale provisions would now be provided service by  
14 BellSouth. The third reason code used was "SE" which means the end user  
15 was converted in error.

16  
17 Also, on page 6 responding to the question concerning disconnect reason  
18 statistics for IDS, the following clarifications need to be made to my direct  
19 testimony:

20  
21 On page 6 at line 4, replace the words "IDS issued" with the words "a total of".  
22 Also, after the word "orders" insert the words "were issued returning IDS  
23 accounts".

24  
25

1 Q. MR. AINSWORTH, DO YOU HAVE ANY FURTHER CORRECTIONS TO  
2 YOUR DIRECT TESTIMONY?

3

4 A. No, I do not.

5

6 Q. MR. MORTON, PLEASE STATE YOUR FULL NAME, YOUR BUSINESS  
7 ADDRESSES, AND YOUR POSITION WITH BELLSOUTH.

8

9 A. My name is Claude P. Morton. I am employed by BellSouth as a Senior Staff  
10 Manager in the Interconnection Billing and Collections Department. My  
11 business address is 3535 Colonnade Parkway, Birmingham, Alabama 35243.

12

13 Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

14

15 A. No.

16

17 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE  
18 COMMISSION?

19

20 A. Yes. I have testified in proceedings before the Public Service Commissions in  
21 Florida, Kentucky and Louisiana and before the Tennessee Regulatory  
22 Authority.

23

24 Q. MR. MORTON, PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR  
25 BACKGROUND AND EXPERIENCE.

1 A. In 1969, I earned Bachelor of Arts degree in English from Brescia University in  
2 Owensboro, Kentucky and I earned a Master of Arts degree in English from  
3 Western Illinois University in 1970. Also, in 1987, I earned a Master of  
4 Business Administration degree from the Amos B. Tuck School at Dartmouth  
5 College in Hanover, New Hampshire. I began employment at BellSouth in  
6 June 1973, and I have held various positions in Consumer Operations,  
7 Marketing, and International Operations before assuming my current  
8 responsibilities in Interconnection Billing and Collections. My current  
9 responsibilities include supervising the line and staff groups (“line” employees  
10 interact with customers; “staff” employees support “line” employees) that  
11 handle accounts receivable management, including collections and billing  
12 disputes, for all of BellSouth’s interconnection (wholesale) business.

13

14 Q. MS. TATE, PLEASE STATE YOUR FULL NAME, YOUR BUSINESS  
15 ADDRESSES, AND YOUR POSITION WITH BELLSOUTH.

16

17 A. My name is Linda W. Tate. I am employed by BellSouth as a Senior Director  
18 in the BellSouth Technology Services - Network Services Delivery  
19 Organization. My business address is 3737 BellSouth Center,  
20 675 West Peachtree Street, Atlanta, Georgia 30375.

21

22 Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

23

24 A. No.

25

1 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE  
2 COMMISSION?

3

4 A. No.

5

6 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR EMPLOYMENT  
7 BY BELLSOUTH.

8

9 A. I began employment at BellSouth in December 1972, and have held various  
10 positions in Operator Services, Distribution, Marketing, and Network before  
11 assuming my current responsibilities in BellSouth Technology Services. I  
12 currently have responsibilities for delivering new system solutions and/or  
13 enhancements for Service Management Layer ("SML") capabilities.

14

15 Q. WHAT IS THE PURPOSE OF YOUR PANEL TESTIMONY?

16

17 A. The purpose of our panel testimony is to respond to specific allegations made  
18 by Mr. Keith Kramer on behalf of IDS Telcom, L.L.C. ("IDS") in IDS'  
19 complaint against BellSouth before the Florida Public Service Commission  
20 ("Commission").

21

22 Q. MR AINSWORTH, PLEASE COMMENT ON MR. KRAMER'S  
23 ALLEGATIONS, ON PAGES 19-21 OF HIS TESTIMONY, THAT  
24 BELLSOUTH WAS SLOW TO RESPOND WHEN THE BULK ORDERING  
25 PROBLEM WAS IDENTIFIED.

1 A. I disagree with Mr. Kramer. As I stated in my direct testimony, BellSouth  
2 implemented extra ordinary measures to resolve the situation. The first  
3 indication that there was a problem came from IDS through the BellSouth  
4 Account Team at approximately 11:30 a.m. central daylight time (CDT) on  
5 Monday, May 8, 2000. IDS indicated that there was a problem with two  
6 telephone numbers giving busy signals when dialed. IDS stated that they  
7 believed there was a problem with BellSouth's Central Office Routing Tables.  
8 The Account Manager and the Customer Support Manager for IDS  
9 immediately began researching the problem. At this point, they were unaware  
10 that bulk ordering was involved.

11  
12 By 2:30 p.m. CDT, the Operations Assistant Vice President of the Local  
13 Carrier Service Center ("LCSC") had become involved. Through further  
14 discussions with IDS, the LCSC had determined that the problem was larger  
15 than first presented, and that the primary problem was the loss of "hunting" on  
16 the converted accounts. It was also determined at this point that the problem  
17 seemed to be related to bulk ordering. The LCSC began to issue service orders  
18 to add "hunting" to the converted accounts as they were identified by IDS. By  
19 4:00 p.m. CDT, the BellSouth Information Technology ("IT") organization had  
20 been engaged, and a request was made to the IT organization to provide a list  
21 of all Purchase Order Numbers ("PONS") issued for IDS via bulk ordering. IT  
22 also began to investigate the cause of the problem.

23  
24 At approximately 9:00 p.m. CDT, the decision was made to suspend bulk  
25 ordering for the UNE-P product to prevent any further problems with the loss

1 of "hunting." At approximately 10:00 p.m. CDT, the LCSC received a list of  
2 accounts that had been converted by bulk ordering. The LCSC began to  
3 proactively review the converted accounts to identify and correct the accounts  
4 that had lost "hunting" during the conversion. They also continued issuing  
5 service orders to add "hunting" on the accounts identified to them by IDS.

6

7 By 11:00 p.m. CDT, bulk ordering of the UNE-P product had been successfully  
8 suspended. As I stated in my direct testimony, the Operations Assistant Vice  
9 President of the LCSC acted as BellSouth's point of contact for IDS  
10 throughout this resolution process. BellSouth also established a hotline that  
11 was staffed 24 hours a day, 7 days a week until all of the problems were  
12 resolved.

13

14 Mr. Kramer's statements that, for several days, BellSouth "failed to rectify the  
15 problem" and "was unable to determine the cause of the problem" are not  
16 correct. As I have stated here, BellSouth immediately began to investigate and  
17 resolve the problem once it was reported by IDS. Further, Mr. Kramer's  
18 statement that "it took BellSouth well over two weeks to fully restore service to  
19 the remaining IDS' customers" is also incorrect. Trouble resolution logs kept  
20 by BellSouth during this resolution process show that almost all of the  
21 problems were resolved within four days and all of the bulk ordering related  
22 conversion problems had been resolved within eight days.

23

24 Q. MR. AINSWORTH, DID ALL OF IDS' CUSTOMERS INVOLVED IN THE  
25 BULK ORDERING CONVERSION PROCESS EXPERIENCE A LOSS OF

1 DIAL TONE? (SEE ALSO KRAMER, PAGE 66, ITEM 9).

2

3 A. No. There were very few instances of conversion-related loss of dial tone  
4 during the bulk ordering process. Only four (4) such instances could be  
5 verified through BellSouth's analysis of its trouble resolution logs kept during  
6 this period. This reflects a very low incidence of loss of dial tone during the  
7 conversion.

8

9 Q. MR. AINSWORTH, IF AN END USER EXPERIENCES PROBLEMS  
10 TODAY WHEN CONVERTING FROM BELL SOUTH TO AN ALEC  
11 PROVIDING UNE-P SERVICE, HOW SHOULD THAT END USER  
12 OBTAIN ASSISTANCE?

13

14 A. As I stated in my direct testimony, the end user should contact the ALEC. The  
15 ALEC, in turn, should call the Maintenance Group in BellSouth's CWINS  
16 Center. The CWINS Center responds by analyzing the problem and  
17 determining what action must be taken to resolve the problem. BellSouth  
18 provides resources and processes that can be utilized by IDS, or any other  
19 ALEC, in such a circumstance.

20

21 Q. MR. AINSWORTH, PLEASE RESPOND TO MR. KRAMER'S  
22 ALLEGATIONS ON PAGES 41 AND 43 OF HIS TESTIMONY THAT IDS  
23 EXPERIENCES A HIGH ERROR RATE ON UNE-P CONVERSIONS.

24

25 A. On page 41, Mr. Kramer states that IDS experiences some sort of problem,



1 such as loss of dial tone, change of hunt rollover grouping, loss of voice mail,  
2 etc., on 30% of IDS' UNE-P conversions. However, on page 43, Mr. Kramer  
3 states that "approximately 50% of IDS' conversion orders were having  
4 problems." Mr. Kramer offers no data to substantiate these claims or to  
5 explain the contradiction in his testimony. As I explained in my direct  
6 testimony, BellSouth has conducted internal maintenance analysis on UNE-P  
7 conversion for all ALECs since June 22, 2001.

8  
9 As show on Exhibit KLA-2 attached to this testimony, between June 22 and  
10 August 6, 2001, BellSouth processed 68,664 UNE-P conversion orders. Out of  
11 these, only 582 (or 0.85%) experienced any kind of conversion-related  
12 problem. In other words, BellSouth performed 99.15% of these UNE-P  
13 conversions without any conversion-related problems. Between July 7 and  
14 July 18, 2001, BellSouth incorporated additional service order edits to further  
15 improve manual processing. As a result, for the period between July 18 and  
16 August 6, 2001, only 179 out of 34,603 UNE-P conversion orders (or 0.53%)  
17 experienced any kind of conversion-related problems. In other words,  
18 BellSouth performed 99.47% of these UNE-P conversions without any kind of  
19 conversion-related problem.

20  
21 Although BellSouth has not broken these numbers down by ALEC, BellSouth  
22 has no reason to believe that the percentages for IDS would be any different  
23 than those for the ALECs as a whole. Considering this analysis, which is based  
24 on actual data, BellSouth does not agree with Mr. Kramer's supposition that  
25 IDS experiences a 30% (or a 50%) error rate when converting to UNE-P.

1 Q. MR. AINSWORTH, CONVERSION OF RESALE CUSTOMERS TO UNE-P  
2 IS A LARGE PART OF IDS' COMPLAINT. IDS HAS INFORMED  
3 BELLSOUTH THAT IDS IS USING SOMETHING CALLED A "W" CODE  
4 TO MAKE THESE CONVERSIONS. COULD YOU EXPLAIN WHAT THE  
5 "W" CODE IS AND PROVIDE BELLSOUTH'S POSITION REGARDING  
6 AN ALEC'S USE OF THE "W" CODE TO SUBMIT UNE-P CONVERSION  
7 REQUESTS?  
8

9 A. Yes. First, however, let me give some history surrounding the "W" code. The  
10 "W" code has traditionally been used when an order requires no change in the  
11 existing class of service. As BellSouth witness Sandra Harris explained in her  
12 direct testimony, however, a conversion from either resale or retail to UNE-P  
13 involves a change in the existing class of service. The "W" code was never  
14 intended to be used for the conversion from a single resale or retail account to  
15 UNE-P. Instead, BellSouth's business rules provide that ALECs should use a  
16 "V" activity code on local service requests ("LSRs") for UNE-P conversions.  
17  
18 IDS has brought to BellSouth's attention that it has been using the "W" code  
19 for the purpose of submitting requests for conversion of a single resale or  
20 BellSouth retail account to UNE-P, and that is evidently working. As I  
21 mentioned above, however, the "W" code was neither intended nor designed  
22 for the purpose of submitting requests for conversion of single accounts when  
23 changing the class of service. Indeed, use of the "W" code in these situations  
24 has never been tested to determine whether it will result in the appropriate  
25 ordering, provisioning, and billing of UNE-P services.

1 Based on IDS' representations, BellSouth has begun looking at the use of the  
2 "W" code to determine whether use of the "W" code in these situations can be  
3 accepted for general use. At present, BellSouth is developing a testing plan to  
4 determine whether use of the "W" code will work in a consistent and  
5 predictable manner and will cause no ordering, provisioning, or billing issues  
6 when used in a manner other than that for which it was developed.

7  
8 Although IDS has evidently been using this code for retail and resale  
9 conversions to UNE-P, and there is no current system edit to prevent the use of  
10 the "W" code in these situations, BellSouth cannot yet endorse the use of the  
11 "W" code in this manner. At present, BellSouth knows that such use is not  
12 compatible with, at a minimum, retail or resale accounts with DSL service or  
13 with any grandfathered service. Accordingly, while nothing prevents an ALEC  
14 from using the "W" code when converting a resale or a BellSouth retail account  
15 to UNE-P, any use of the "W" code in such situations is at the sole risk of the  
16 ALEC.

17  
18 Q. MR. MORTON, DID YOU WRITE THE LETTER INCLUDED AS EXHIBIT  
19 KK-13 TO MR. KRAMER'S TESTIMONY?

20  
21 A. Yes. I personally wrote and mailed the letter on January 8, 2001. The letter  
22 requested that IDS pay all delinquent amounts or BellSouth would be forced to  
23 discontinue accepting new orders from IDS.

24  
25 Q. MR. MORTON, PLEASE EXPLAIN WHY YOU WROTE THIS LETTER.

1 A. In the normal course of business, I became aware that IDS' past due balance  
2 was substantially increasing. At no time, however, did any BellSouth  
3 employee direct me to investigate IDS' financial status.

4  
5 At the time that I wrote the letter described above, IDS' accounts were  
6 seriously delinquent by more than \$2.5 million dollars. BellSouth's processes  
7 and procedures require that this type of letter be sent as an initial step in the  
8 standard treatment effort to collect delinquent accounts. Typically, my staff  
9 writes such letters, but I wrote this one personally because of a conference call  
10 I had participated in around the end of November 2000 where the delinquency  
11 was discussed.

12  
13 Q. MR. MORTON, WHY DID BELLSOUTH TAKE THIS TREATMENT  
14 STEP?

15  
16 A. BellSouth took this treatment step to collect on IDS' delinquent accounts based  
17 upon the mutually agreed terms of Attachment 1, Section 8.2.1 of the  
18 Interconnection Agreement between BellSouth and IDS. This section states in  
19 part:

20  
21 BellSouth reserves the right to suspend or terminate service for  
22 nonpayment. If payment of account is not received by the bill day  
23 in the month after the original bill day, BellSouth may provide  
24 written notice to IDS, that additional applications for service will  
25 be refused and that any pending orders for service will not be  
completed if payment is not received by the fifteenth day following  
the date of the notice. In addition BellSouth may, at the same time,  
provide written notice to the person designated by IDS to receive  
notices of noncompliance that BellSouth may discontinue the

1 provision of existing services to IDS, if payment is not received by  
2 the thirtieth day following the date of the notice.

3

4

5 The letter I sent to IDS followed the terms of the Interconnection Agreement.

6

7 The letter allowed fifteen days after the date of the letter for IDS to pay the  
8 delinquent amount in order to prevent the holding of service orders. The letter

9

10 allowed thirty days after the date of the letter for IDS to pay the delinquent

11

12 amount in order to prevent disruption of IDS' customers' service.

13

14

15 Q. MR. MORTON, PLEASE EXPLAIN THE "SERVICE RESTORAL FEE"  
16 MENTIONED BY MR. KRAMER ON PAGE 54 OF HIS DIRECT  
17 TESTIMONY.

18

19

20 A. Under the Interconnection Agreement, when an ALEC is delinquent in its  
21 payments, the first step is for BellSouth to request payment. BellSouth also  
22 has the right to refuse to accept new orders. Neither of these actions would  
23 affect service to existing end users. If, however, the ALEC does not take  
24 appropriate action to resolve the delinquent account, BellSouth's  
25 Interconnection Agreement allows BellSouth to deny service to existing end  
users. If an end user's service is interrupted (denied) because of the account  
delinquency of the serving ALEC, BellSouth charges a restoral fee  
(reconnection fee) for each end user that is later restored to service. This is in  
accordance with Attachment 1, Section 8.2.5 of the Interconnection  
Agreement:

26

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Upon discontinuance of service to an IDS account, service to IDS' end users will be denied. BellSouth will also reestablish service at the request of the end user or IDS upon payment of the appropriate connection fee and subject to BellSouth's normal application procedures. IDS is solely responsible for notifying the end user of the proposed disconnection of the service.

At no time did BellSouth deny service to IDS' customers for IDS' failure to pay on its delinquent account. To this day, IDS owes BellSouth approximately \$5.9 million dollars, and BellSouth still has not denied service to any of IDS' customers, although it is within BellSouth's rights under the Interconnection Agreement to do so.

Q. MR. MORTON, PLEASE RESPOND TO MR. KRAMER'S STATEMENT ON PAGE 54 THAT "NO SPREADSHEET OR EXPLANATIONS WERE ATTACHED" TO YOUR LETTER.

A. During telephone conversations I had with Mr. Kramer, he indicated that IDS could not identify the same level of delinquency in IDS' accounts as my letter to IDS indicated was shown in BellSouth's records. In those conversations, I told Mr. Kramer that IDS had been sent each of the bills in question and should be able to identify them. I explained to him that BellSouth could provide supporting documentation to indicate how much was delinquent on each separate account. I further explained that if IDS required the bills to be regenerated there would be a charge for that work. Mr. Kramer accepted my explanation and told me that if he needed either the documentation or duplicate bills he would call me back. He never called back.

1 Q. MS. TATE, DID YOU MEET WITH MR. KRAMER TO DISCUSS  
2 PROBLEMS WITH THE BULK ORDERING CONVERSION PROCESS AS  
3 HE DESCRIBES ON PAGES 23 AND 24 OF HIS TESTIMONY?

4

5 A. I do not recall meeting with Mr. Kramer to discuss the bulk ordering  
6 conversion process during the timeframe referenced in his testimony. I do  
7 recall, however, that after the Bulk Ordering Incident in May 2000, I informed  
8 Mr. Kramer that it had not been BellSouth's intent to roll out the bulk ordering  
9 feature at the CLEC forum. I also informed him that BellSouth wanted to  
10 thoroughly test the bulk ordering feature with an ALEC via a beta test, and  
11 that, because BellSouth had not yet completed a successful beta test, the  
12 product was not ready for delivery to the ALECs.

13

14 Q. MS. TATE, WHAT BETA TEST HAD BELLSOUTH DONE PRIOR TO  
15 THE BULK ORDERING INCIDENT?

16

17 A. On April 19, 2000, BellSouth beta tested the bulk ordering feature with Access  
18 Integrated. The results of the test evidenced numerous problems with the  
19 feature. I determined at that point that additional beta testing was required, and  
20 that the bulk ordering feature was not ready for ALEC use.

21

22 Q. MS. TATE, IF YOU HAD DETERMINED THAT THE BULK ORDERING  
23 FEATURE WAS NOT READY FOR ALEC USE, CAN YOU EXPLAIN  
24 WHY BELLSOUTH ANNOUNCED AT THE CLEC INFORUM THAT THE  
25 BULK ORDERING FEATURE WAS AVAILABLE?

1

2 Q. As discussed in BellSouth witness Petra Pryor's direct testimony, as a result of  
3 internal miscommunication, the Sales Operations group was not notified that  
4 further beta testing was required before the bulk ordering feature could be  
5 made available. I had attempted to alert the appropriate people prior to being  
6 away from the office for an extended period of time due to a death in my  
7 family. After I returned to work, I learned that the Sales Operations group had  
8 erroneously announced at the CLEC forum that the bulk ordering feature was  
9 available.

10

11 Q. DOES THIS CONCLUDE YOUR PANEL TESTIMONY?

12

13 A. Yes.

14

15

16

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**UNE-P CONVERSION  
LMOS ANALYSIS  
SUMMARY PAGE  
July 18 through August 6, 2001**

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Exhibit KLA-2  
Page 1 of 3

<b>Date Reviewed</b>	<b>Date Service Orders Completed</b>	<b>Total Order Volume</b>	<b>Total Troubles Reviewed</b>	<b>Total Troubles due to Conversion</b>	<b>Percentage of Troubles due to Conversion</b>	<b>Out Of Service due to Conversion</b>	<b>Percentage Out of Service Due to Conversion</b>	<b>Affecting Service due to Conversion</b>	<b>Percentage Affecting Service</b>
7/30/01	7/18/01	3116	97	19	0.61%	5	0.16%	14	0.45%
7/30/01	7/19/01	2297	99	16	0.70%	2	0.09%	14	0.61%
7/31/01	7/20/01	1743	73	15	0.86%	7	0.40%	8	0.46%
7/31/01	7/21/01	400	17	4	1.00%	0	0.00%	4	1.00%
7/30/01	7/22/01	30	4	0	0.00%	0	0.00%	0	0.00%
8/1/01	7/23/01	1783	53	13	0.73%	2	0.11%	11	0.62%
8/1/01	7/24/01	3693	92	6	0.16%	6	0.16%	0	0.00%
8/2/01	7/25/01	2201	72	11	0.50%	1	0.05%	10	0.45%
8/2/01	7/26/01	2273	87	22	0.97%	4	0.18%	18	0.79%
8/3/01	7/27/01	1804	75	18	1.00%	6	0.33%	11	0.61%
8/6/01	7/28/01	156	9	0	0.00%	0	0.00%	0	0.00%
8/6/01	7/29/01	147	9	3	2.04%	2	1.36%	1	0.68%
8/6/01	8/30/01	2131	88	12	0.56%	5	0.23%	7	0.33%
8/7/01	7/31/01	3089	72	10	0.32%	3	0.10%	7	0.23%
8/8/01	8/1/01	2621	76	6	0.23%	4	0.15%	2	0.08%
8/8/01	8/2/01	2133	75	11	0.52%	6	0.28%	5	0.23%
8/10/01	8/3/01	2165	79	3	0.14%	0	0.00%	3	0.14%
8/13/01	8/4/01	204	11	1	0.49%	0	0.00%	1	0.49%
8/13/01	8/6/01	2077	59	9	0.43%	4	0.19%	5	0.24%
<b>Total Percentages</b>		<b>34063</b>	<b>1147</b>	<b>179</b>	<b>0.53%</b>	<b>57</b>	<b>0.17%</b>	<b>121</b>	<b>0.36%</b>

**UNE-P CONVERSION**

**LMOS ANALYSIS**

**SUMMARY PAGE**

June 22 through August 6, 2001

BellSouth Telecommunications, Inc.

Florida Public Service Commission

Docket No. 010740-TP

Exhibit KLA-2

Page 2 of 3

Date Reviewed	Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Total Troubles due to Conversion	Percentage of Troubles due to Conversion	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion	Affecting Service due to Conversion	Percentage Affecting Service
7/11/01	6/22/01	1796	90	36	2.00%	0	0.00%	36	2.00%
7/11/01	6/23/24	284	18	8	2.82%	0	0.00%	8	2.82%
7/11/01	6/25/01	1934	88	31	1.60%	2	0.10%	29	1.50%
7/10/01	6/26/01	2725	88	25	0.92%	9	0.33%	16	0.59%
7/9/01	6/27/01	1568	88	13	0.83%	3	0.19%	10	0.64%
7/9/01	6/28/01	1842	76	20	1.09%	7	0.38%	13	0.71%
7/6/01	6/29/01	1900	80	22	1.16%	4	0.21%	18	0.95%
7/16/01	7/2/01	2050	121	25	1.22%	7	0.34%	18	0.88%
7/17/01	7/3/01	1473	45	7	0.48%	3	0.20%	4	0.27%
7/17/01	7/5/01	1561	106	29	1.86%	7	0.45%	22	1.41%
7/18/01	7/6/01	1393	71	20	1.44%	1	0.07%	19	1.36%
7/18/01	7/7/01	616	35	11	1.79%	5	0.81%	6	0.97%
7/18/01	7/9/01	1419	101	20	1.41%	2	0.14%	18	1.27%
7/19/01	7/10/01	2128	104	19	0.89%	3	0.14%	16	0.75%
7/19/01	7/11/01	1585	76	13	0.82%	4	0.25%	9	0.57%
7/19/01	7/12/01	1959	80	21	1.07%	2	0.10%	19	0.97%
7/20/01	7/13/01	2032	55	16	0.79%	3	0.15%	13	0.64%
7/23/01	7/14/01	187	11	3	1.60%	0	0.00%	3	1.60%
7/23/01	7/15/01	44	6	4	9.09%	1	2.27%	3	6.82%
7/24/01	7/16/01	2984	99	31	1.04%	10	0.34%	21	0.70%
7/24/01	7/17/01	3121	117	29	0.93%	4	0.13%	25	0.80%
7/30/01	7/18/01	3116	97	19	0.61%	5	0.16%	14	0.45%
7/30/01	7/19/01	2297	99	16	0.70%	2	0.09%	14	0.61%
7/31/01	7/20/01	1743	73	15	0.86%	7	0.40%	8	0.46%
7/31/01	7/21/01	400	17	4	1.00%	0	0.00%	4	1.00%
7/30/01	7/22/01	30	4	0	0.00%	0	0.00%	0	0.00%
8/1/01	7/23/01	1783	53	13	0.73%	2	0.11%	11	0.62%
8/1/01	7/24/01	3693	92	6	0.16%	6	0.16%	0	0.00%
8/2/01	7/25/01	2201	72	11	0.50%	1	0.05%	10	0.45%

**UNE-P CONVERSION  
LMOS ANALYSIS  
SUMMARY PAGE  
June 22 through August 6, 2001**

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Exhibit KLA-2  
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<b>Date Reviewed</b>	<b>Date Service Orders Completed</b>	<b>Total Order Volume</b>	<b>Total Troubles Reviewed</b>	<b>Total Troubles due to Conversion</b>	<b>Percentage of Troubles due to Conversion</b>	<b>Out Of Service due to Conversion</b>	<b>Percentage Out of Service Due to Conversion</b>	<b>Affecting Service due to Conversion</b>	<b>Percentage Affecting Service</b>
8/2/01	7/26/01	2273	87	22	0.97%	4	0.18%	18	0.79%
8/3/01	7/27/01	1804	75	18	1.00%	6	0.33%	11	0.61%
8/6/01	7/28/01	156	9	0	0.00%	0	0.00%	0	0.00%
8/6/01	7/29/01	147	9	3	2.04%	2	1.36%	1	0.68%
8/6/01	7/30/01	2131	88	12	0.56%	5	0.23%	7	0.33%
8/7/01	7/31/01	3089	72	10	0.32%	3	0.10%	7	0.23%
8/8/01	8/1/01	2621	76	6	0.23%	4	0.15%	2	0.08%
8/8/01	8/2/01	2133	75	11	0.52%	6	0.28%	5	0.23%
8/10/01	8/3/01	2165	79	3	0.14%	0	0.00%	3	0.14%
8/13/01	8/4/01	204	11	1	0.49%	0	0.00%	1	0.49%
8/13/01	8/6/01	2077	59	9	0.43%	4	0.19%	5	0.24%
<b>Total Percentages</b>		<b>68664</b>	<b>2702</b>	<b>582</b>	<b>0.85%</b>	<b>134</b>	<b>0.20%</b>	<b>447</b>	<b>0.65%</b>