

ORIGINAL

Legal Department

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JAMES MEZA III  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

COMMISSION  
CLERK

August 31, 2001

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

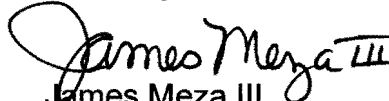
**Re: Docket No. 010740-TP (IDS Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Late Filed Deposition Exhibit Nos. 1, 2 (confidential), 3 (confidential), 4 (confidential), 5 and 6 (confidential) for Gloria Burr; Exhibit No. 1 (confidential) for Berlene Means; Exhibit Nos. 1 (confidential) and 2 for Ken Ainsworth and Exhibit No. 1 for Vickie Beachley, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
James Meza III  
(2)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
LEG   1    
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PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC   1    
SER \_\_\_\_\_  
OTH \_\_\_\_\_

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10894 AUG 31 01

FPSC-COMMISSION CLERK

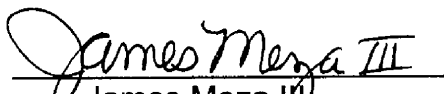
**CERTIFICATE OF SERVICE**  
**Docket No. 010740-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
by Electronic Mail and Federal Express this 31st day of August, 2001 to the following:

Mary Anne Helton  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Te. No. (850) 413-6096  
[mhelton@psc.state.fl.us](mailto:mhelton@psc.state.fl.us)

Suzanne Fannon Summerlin (+)  
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Suite 201  
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Represents IDS

Michael Noshay, President  
IDS Long Distance, Inc.  
n/k/a IDS Telcom, LLC  
1525 N.W. 167th Street  
Second Floor  
Miami, Florida 33169  
Tel. No. (305) 913-4000  
Fax No. (305) 913-4039  
[mnohay@idstelcom.com](mailto:mnohay@idstelcom.com)

  
James Meza III  
(28)

(+) Signed Protective Agreement

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Gloria Burr Late File Deposition Exhibit  
Exhibit No. 1

**REQUEST:** Please provide a chronology of the development of UNE-P and bulk ordering.

**RESPONSE:** BellSouth objects to this request on the grounds that a late-filed deposition exhibit is not the proper procedure to obtain this information. Subject to and without waiving the foregoing objection, Ms. Burr does not possess any documents responsive to this request.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Gloria Burr Late File Deposition Exhibit  
Exhibit No. 2

REQUEST: Please provide the UNE-P and bulk ordering user acceptance test case, criteria, system requirements, and user requirements.

RESPONSE: BellSouth objects to this request on the grounds that a late-filed deposition exhibit is not the proper procedure to obtain this information. Subject to and without waiving the foregoing objection, please see the attached documents, which are being produced subject to the Protective Agreement executed by the parties and a Notice of Intent: (1) bulk ordering system requirements; (2) bulk ordering user requirements; and (3) bulk ordering test results. Ms. Burr is attempting to obtain this information for the UNE-P product.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Gloria Burr Late File Deposition Exhibit  
Exhibit No. 3

**REQUEST:** Please provide the UNE-P and bulk ordering final report and findings.

**RESPONSE:** BellSouth objects to this request on the grounds that a late-filed deposition exhibit is not the proper procedure to obtain this information. Subject to and without waiving the foregoing objection, please see the attached document, entitled Port Loop Combo Beta Trial Results, which is being produced subject to the Protective Agreement executed by the parties and a Notice of Intent. Ms. Burr is attempting to obtain this information for the UNE-P product.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Gloria Burr Late File Deposition Exhibit  
Exhibit No. 4

**REQUEST:** Please provide the UNE-P and bulk ordering business rules written by SME.

**RESPONSE:** BellSouth objects to this request on the grounds that a late-filed deposition exhibit is not the proper procedure to obtain this information. Subject to and without waiving the foregoing objection, please see the attached document, entitled draft M&P, which is being produced subject to the Protective Agreement executed by the parties and a Notice of Intent. Ms. Wellman never provided a final version of the business rules to the user requirements team. Ms. Burr is attempting to obtain this information for the UNE-P product.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Gloria Burr Late File Deposition Exhibit  
Exhibit No. 5

**REQUEST:** Please provide the UNE-P and bulk ordering sign off documents.

**RESPONSE:** BellSouth objects to this request on the grounds that a late-filed deposition exhibit is not the proper procedure to obtain this information. Subject to and without waiving the foregoing objection, Ms. Burr does not have any documents in her possession responsive to this request.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Gloria Burr Late File Deposition Exhibit  
Exhibit No. 6

REQUEST: Please produce the PMO scope showing the release of the bulk ordering product.

RESPONSE: BellSouth objects to this request on the grounds that a late-filed deposition exhibit is not the proper procedure to obtain this information, which is being produced subject to the Protective Agreement executed by the parties and a Notice of Intent. Subject to and without waiving the foregoing objection, please see the attached document, entitled EIO Release 6.2



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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Berlene Means Late File Deposition Exhibit  
Exhibit No. 1

**REQUEST:** Please produce a list of the service representatives in your group, listing the years of experience for each.

**RESPONSE:** See attached list, which is being produced subject to the Protective Agreement executed by the parties and a Notice of Intent.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Ken Ainsworth Late File Deposition Exhibit  
Exhibit No. 1

REQUEST: Please produce the IDS trouble resolution logs.

RESPONSE: Please see attached documents, which are being produced subject to the Protective Agreement executed by the parties and a Notice of Intent.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Ken Ainsworth Late File Deposition Exhibit  
Exhibit No. 2

REQUEST: Please produce your analysis of the loss of dial tone during the conversion process.

RESPONSE: Please see the attached documents.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Ken Ainsworth Late File Deposition Exhibit  
Exhibit No. 2  
**ATTACHMENT**

**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

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
7/30/01	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-TF  
Ken Ainsworth Late Filed Exhibit 2

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  
Ken Ainsworth Late Filed Exhibit 2

<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>



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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Vickie Beachley Late File Deposition Exhibit  
Exhibit No. 1

REQUEST: Please produce an order flow chart.

RESPONSE: Attached is Ms. Beachley's understanding of how an order processes.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 010740-TP  
Vickie Beachley Late File Deposition Exhibit  
Exhibit No. 3  
**ATTACHMENT**

Unofficial - High Level Process Flow –  
 As Interrupted and Believed to be  
 Correct by Vickie Beachley 8/21/01

