

ORIGINAL

ATTACHMENT B

BellSouth Telecommunications, Inc.
FPSC Docket No. 960786-TL
Request for Confidential Classification
Page 1 of 1
9/10/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
UNBUNDLED NETWORK ELEMENT (UNE) COST STUDIES FILED AS
REVISED EXHIBIT DDC-1 TO THE SURREBUTTAL TESTIMONY OF DAONNE
CALDWELL, AND A REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
THE SURREBUTTAL TESTIMONY OF KEN L. AINSWORTH FILED ON
AUGUST 20, 2001, IN FLORIDA DOCKET NO. 960786-TL.

Two Redacted Copies

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
SURREBUTTAL TESTIMONY OF KEN L. AINSWORTH
ON BEHALF OF
BELLSOUTH TELECOMMUNICATIONS, INC.
DOCKET NO. 960786-TL
AUGUST 20, 2001

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

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

Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

A. Yes. I have previously filed direct testimony in this proceeding on May 31, 2001.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

A. The purpose of my surrebuttal testimony is to respond to the testimony and Affidavits filed by various parties in response to BellSouth's May 22, 2001 filing.

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1 Q. PLEASE RESPOND TO AT&T'S TESTIMONY DEALING WITH
2 REASSIGNMENT OF TELEPHONE NUMBERS.

3
4 A. Ms. Denise Berger of AT&T (pgs. 32-33) alleges that BellSouth has a chronic
5 number reassignment problem. BellSouth has previously identified two issues that
6 caused a problem with duplicate assignment of ported telephone numbers. The first
7 issue was identified in 1999. BellSouth determined that when orders were issued
8 without a certain field identifier ("FID"), the number would not indicate a ported
9 designation in BellSouth's number assignment database. This could allow for a
10 number reassignment. In December of 1999, BellSouth implemented an edit in the
11 order negotiations systems, to ensure that the appropriate FIDs were included on
12 the ported out order, thus preventing the erroneous duplication of number
13 assignments. At the same time, a review of BellSouth's embedded base of
14 telephone numbers was conducted to ensure errors that may have occurred prior to
15 the implementation of the edit were corrected.

16
17 The second issue surfaced in the last quarter of 2000. Reports of telephone
18 numbers being reassigned again surfaced. After researching the problem,
19 BellSouth determined that due to a software upgrade that a ported block of DID
20 numbers would only mark the lead number as ported in the number database. A
21 software solution currently is being pursued to resolve this issue. BellSouth
22 implemented an interim manual solution in January 2001 to correct this problem.
23 The manual workarounds will continue to ensure all future port out activity will be
24 properly marked in BellSouth's number assignment database to prevent duplicate
25 assignment of numbers.

1 Additionally, BellSouth began working with AT&T and all Alternative Local
2 Exchange Carriers (“ALECs”) to verify all numbers that had been ported since
3 January 2000. A manual verification and correction, if necessary, was performed
4 on all numbers affected by this issue. The review and correction for AT&T was
5 completed on May 23, 2001. In summary, BellSouth believes that these problems
6 have been identified and corrected.

7

8 Q. PLEASE EXPLAIN THE PROBLEMS AT&T CUSTOMERS HAVE
9 REGARDING DUPLICATE BILLING.

10

11 A. AT&T witnesses, Ms. Berger (pgs. 35-36) and Ms. Wheeler (pg. 11), raise issues
12 dealing with duplicate billing of AT&T customers after they have switched local
13 providers. Duplicate billing does, on occasion, occur. However, the source of the
14 problem can be caused by the ALEC or by BellSouth. For example, Ms. Berger
15 failed to mention that there could be duplicate billing for disconnects processed
16 during a current billing period, where the ALEC does not transfer all of the end user
17 services or in situations where the ALEC does not properly complete the porting of
18 all telephone numbers associated with their Local Service Request (“LSR”). The
19 issuance of a final bill will be a duplicate that is necessary to close the account from
20 BellSouth's records. If the ALEC does not transfer all of the end-users’ services
21 then BellSouth will continue to bill for the remaining services provided by
22 BellSouth and duplicate billing will occur. The improper number porting by the
23 ALEC will not allow the order to be processed and billing will continue until the
24 porting discrepancy is resolved.

25

1 BellSouth has worked within the various collaboratives to investigate and resolve,
2 where necessary, these types of issues. Where duplicate billing issues do occur, the
3 proper process is for the ALEC to contact the Billing Resolution Group who will
4 investigate any individual issues and work with the ALEC to resolve it in an
5 expeditious manner.

6

7 Q. PLEASE ADDRESS THE PARTIAL PORT ISSUE.

8

9 A. Ms. Berger's allegation (pgs. 36-37) that BellSouth does not have the ability to
10 efficiently handle the partial porting of a customer's service from BellSouth to
11 another ALEC is simply not the case. BellSouth has detailed processes and
12 procedures for provisioning a partial port of a customer's service. The process can
13 be found in the BellSouth Business Rules located on the Internet at
14 <http://www.interconnection.bellsouth.com/guides/html/leo.html> (see Section 2.4 of
15 the General Local Service Ordering Information for Partial Migration).

16

17 Ms. Berger did not provide any specific examples in support of her allegations;
18 thus, BellSouth cannot specifically address her concerns other than to say that
19 BellSouth successfully conducts partial migrations for ALECs without any
20 interruption to the end user's service every day.

21

22 I would also point out that to effectuate an efficient partial migration of service,
23 ALECs have responsibilities. As an example, ALECs must provide the main
24 billing account number that will be porting on the LSR. Additionally, the ALEC
25 must obtain from the end user the new billing telephone number ("TN") that will

1 remain with BellSouth. An ALEC's failure to adhere to the proper processes will
2 impact the efficiency of the partial port process.

3

4 Q. PLEASE RESPOND TO WHAT MS. BERGER REFERS TO AS A "SNAP
5 BACK".

6

7 A. Ms. Berger's discussion of "snap back" (pgs. 41-42) references a scenario in which
8 AT&T would like for BellSouth to return a customer to BellSouth after they have
9 been ported to AT&T. If AT&T requests that the number port order be canceled
10 prior to porting, the order will be canceled. AT&T is in control of when the
11 number is ported. BellSouth does not perform the activation of the number port.
12 Once AT&T has ported a customer's number in NPAC, the order is completed and
13 BellSouth requires that an order be issued to port the customer back to BellSouth.
14 BellSouth has to assume that when an order is received and a Firm Order
15 Confirmation ("FOC") is issued, AT&T intends for that order to be worked. If
16 AT&T discovers that either the customer has changed their mind or that AT&T has
17 problems that will not allow them to provide service to the customer, AT&T should
18 notify BellSouth of this prior to the scheduled date for the port and AT&T should
19 not perform the number port activation. After AT&T has ported the number,
20 BellSouth would expect a service order from the customer if they wish to return to
21 BellSouth.

22

23 Q. DO YOU BELIEVE THAT BELLSOUTH IS CAUSING A NEGATIVE IMPACT
24 ON CUSTOMERS IN THIS SITUATION?

25

1 A. No. AT&T is in complete control of the number port activation process. AT&T
2 also has the opportunity to perform line test prior to port activation. This should
3 negate the need for post-port issues and snap backs. Also snap backs without
4 establishing valid orders would increase the opportunity for additional negative
5 customer impacts. BellSouth's process is to work with the ALEC to resolve any
6 post port issue as expeditiously as possible. This process minimizes service
7 impacts, additional customer inconvenience and the need for unnecessary rework.

8
9 Q. PLEASE DISCUSS HOW A RETAIL CUSTOMER ORDERS AND/OR
10 RECEIVES STATUS INFORMATION VERSUS HOW AN ALEC ORDERS
11 AND OBTAINS STATUS INFORMATION FROM BELL SOUTH.

12
13 A. AT&T's witness, Ms. Berger (pgs. 23-24) alleges that BellSouth retail customers
14 have access to more orders and/or status information than ALECs. Ms. Berger
15 would have you believe that an ALEC's only method for receiving complete,
16 accurate and timely information concerning service requests is through the LCSC.
17 To make her case, Ms. Berger chooses to discuss only a subset of the options
18 available to a ALEC and to ignore the interfaces BellSouth provides for order entry,
19 status information and completion notice information, and the many web-based
20 reports discussed in my direct testimony. Unlike the retail customer, who is solely
21 dependent on calling a BellSouth Service Center, the ALEC may utilize either the
22 electronic options for pre-ordering, ordering, and completion notice or BellSouth's
23 web-based reports, without interfacing with the LCSC. A complete description of
24 the various reports to which I am referring can be found on pages 28 through 30 of
25 my direct testimony.

1 Q. PLEASE RESPOND TO AT&T's UNE-P MIGRATION ISSUES.

2

3 A. Ms. Bernadette Siegler of AT&T attempts to paint a picture of an enormous
4 problem with loss of dial tone during conversion of UNE-P and the resulting impact
5 on end user service and results reporting. This ALEC is mischaracterizing the issue
6 as will be explained below. BellSouth has a process in place that ensures a near
7 seamless conversion for the end user from BellSouth to an ALEC. In a constant
8 effort to improve the process, BellSouth conducts a UNE-P collaborative meeting
9 to cooperatively work with ALECs to address any issues, which might impact
10 service to the end user. The loss of dial tone issue raised by AT&T was listed on
11 the action register in March of 2001. In response, BellSouth took effective steps to
12 address the issues expressed by this collaborative.

13

14 Ms. Seigler's comments (pg. 8) concerning an unacceptably high rate of loss of
15 service to AT&T end users during conversion to UNE-P, as well as any
16 shortcomings in BellSouth's processes or BellSouth's failure to correct identified
17 BellSouth problems, are a misrepresentation of the facts.

18

19 Q. PLEASE DISCUSS ALLEGED UNE-P CONVERSION PROBLEMS.

20

21 A. On pgs. 9-10 of Ms. Siegler's testimony, she discusses an analysis of alleged
22 conversion problems experienced to date by AT&T end users. As Ms. Seigler
23 points out, Ms. Berger addressed a letter to me with 12 examples of situations
24 where customers lost dial tone during the conversion. Additionally, the account

1 team requested that AT&T provide additional examples of conversion problems. In
2 all, AT&T provided a total of 38 Purchase Order Numbers (“PONS”) for analysis.

3

4 Q. WHAT WAS THE RESULT OF THE ANALYSIS?

5

6 A. The results are as follows:

7

8 • Three of the 38 resulted in the customer losing service during the
9 conversion. Two were the result of BellSouth failing to follow its
10 documented processes and one was a switch feature problem.

11 • For 12 of the 38, BellSouth did not receive a trouble report from AT&T.

12 • For eight of the 38, either no trouble has been found in the BellSouth
13 network or the customer did not know how to use their call forward
14 feature. Of these, three were reported greater than 30 days from
15 conversion, two greater than 25 days from conversion, one greater than 17
16 days from conversion and two within two days. One of these was a
17 customer education problem and one of these customers reported that he
18 had been slammed by AT&T and subsequently switched back to
19 BellSouth.

20

21 • Eight had BellSouth problems in the loop or network terminating wire.
22 Of these, one was greater than 30 days from conversion, three were

1 greater than 20 days from conversion, two were greater than 15 days, and
2 two were less than five days from conversion

3 • Five of the examples provided were duplicates.

4

5 • Two of the examples, we could not locate a valid PON.

6

7 In summary, of the 38 submitted by AT&T, only three experienced problems that
8 could be related to the conversion activity.

9

10 Q. DOES YOUR ANALYSIS SUPPORT THE CLAIM THAT BELLSOUTH'S
11 PROCESSES CAUSE A HIGH RATE OF END USER SERVICE PROBLEMS?

12

13 A. No. Ms. Siegler's claim that BellSouth processes cause a high rate of end
14 user service problems is unsubstantiated (pg. 8). BellSouth's processes that support
15 UNE-P conversion provide for a near seamless transfer of service from BellSouth
16 to any ALEC. To date, BellSouth has converted over [REDACTED] end users from
17 BellSouth to AT&T using our UNE-P conversion processes. Of the examples
18 supplied by AT&T, three customers lost service during the conversion. The
19 remaining had normal network or customer issues that were not related to the
20 conversion process therefore, the customer would have had the same problem had
21 they stayed with BellSouth. (See Exhibit LCSC-1.)

22

23

1 To try to summarize the impact of loss of dial tone mentioned by all affiants to this
2 proceeding, I would like to offer the following data that supports my earlier
3 statements that BellSouth's use of the D and N order process provides a near
4 seamless conversion process: Regionally, BellSouth has processed over 268,841
5 UNE-P requests from January to May 2001. Breaking these numbers down to each
6 of the respondents commenting on loss of dial tone indicates the following: AT&T
7 has converted [REDACTED] with only three occasions of no dial tone attributed to the
8 conversion or .09 of a percent.

9
10 Q. HAS BELLSOUTH PERFORMED ANY OTHER ANALYSIS ON UNE-P
11 CONVERSIONS?

12
13 A. Yes. BellSouth has been conducting a maintenance analysis on UNE-P
14 conversions for all ALECs since June 22, 2001. Between June 22 and July 17,
15 2001, BellSouth processed 34,601 UNE-P conversion orders. Out of these, only 77
16 or 0.22% could be attributed to lost dial tone during the conversion. In other
17 words, BellSouth performed 99.78% of the UNE-P conversions without a
18 conversion-related loss of dial tone incident. Between July 7 and July 18, 2001,
19 BellSouth added additional service order edits to minimize loss of dial tone. As a
20 result, for the period between July 18 and August 6, 2001, out of 34,063 UNE-P
21 orders analyzed, only 57 or 0.17% experienced a loss of dial tone. In other words,
22 BellSouth performed 99.83% of UNE-P conversions without a conversion-related
23 dial tone incident.

24
25

1 Q. HAS BELLSOUTH FAILED TO ADDRESS ITEMS IDENTIFIED IN THE
2 UNE-P USER GROUP?

3

4 A. Absolutely not. BellSouth has not failed to take action to correct problems
5 identified in the UNE-P user group as alleged by Ms. Siegler on pg. 11 of her
6 testimony. Only two issues have been brought to BellSouth's attention requiring
7 refinement to this process. One deals with tear down of voicemail boxes, and the
8 other with incorrectly assigning new facilities on the "N Order" resulting in service
9 interruption to the end user.

10

11 The first issue was related to MemoryCall™ mailboxes being incorrectly torn
12 down. This issue came up at the ALEC Collaborative meetings held in Louisiana
13 during January 2001. BellSouth agreed to investigate the issue in an effort to
14 resolve the problem. As a result of the investigation an edit was implemented on
15 April 6th requiring a DNTD ("Do Not Tear Down") FID to be added to the "N
16 Order", as well as the "D Order", to prevent the mailboxes from going down on the
17 conversion.

18

19 The second issue, new facility assignments, was the result of service representatives
20 in the LCSC mishandling manual requests and electronic fallout. To resolve this,
21 BellSouth has conducted refresher training for the LCSC representatives to increase
22 awareness and stress the importance of eliminating any service outage to end-users.

23

24 The goal is to eliminate outages by issuing quality service orders, assuring the
25 ALECs of a smooth and uninterrupted conversion. This training was completed
with all representatives effective May 18, 2001. BellSouth is confident that these

1 steps have resulted in the elimination of problems causing end users to experience
2 problems during UNE-P conversions. BellSouth will continue to work
3 cooperatively within the confines of the UNE-P User Group meetings, as well as
4 independently on our own, to identify and implement, if necessary, changes to the
5 process.

6

7 Q. PLEASE DISCUSS ERRONEOUS DISCONNECTS ASSOCIATED WITH
8 COORDINATED HOT CUTS.

9

10 A. I will respond to pgs. 20-21 of Ms. Berger's testimony where she describes a
11 problem with erroneous disconnects associated with coordinated hot cuts. A
12 coordinated hot cut is just that, BellSouth and AT&T coordinate the conversion
13 including number porting and the disconnect in BellSouth's legacy system. For a
14 coordinated conversion of a loop with LNP, BellSouth allows AT&T to accept the
15 conversion and perform appropriate testing prior to accepting the service. If AT&T
16 accepts the service or is not available to accept the service, based on the terms of
17 our "Hot Cut" memorandum, BellSouth runs the disconnect to ensure proper switch
18 translations are completed in the BellSouth switch. AT&T is in control of when the
19 disconnect is completed by BellSouth in this instance and, therefore, should be
20 ready to accept the customer's service. In order for BellSouth to reestablish
21 service, service orders must be issued to reestablish service to the end user. This is
22 the same process that occurs for an erroneous disconnect of a BellSouth end user.
23 Both are handled as a provisioning issue and not a maintenance issue.

24

25

1 Q. PLEASE COMMENT ON ERRONEOUS DISCONNECTS CAUSED BY AT&T
2 ERRORS.

3

4 A. I will respond to pgs. 21-22 of Ms. Berger's testimony where she discusses
5 erroneous disconnects caused by AT&T errors. BellSouth processes disconnects of
6 end users per AT&T's submission of LSRs. Where AT&T has erroneously
7 disconnected their end users, BellSouth has already processed the disconnect
8 request in its legacy systems. The burden for ensuring the appropriateness of the
9 disconnect, is clearly on AT&T's shoulders and not BellSouth's. Again, in order
10 for BellSouth to reestablish service, service orders must be issued to reestablish
11 service to the end user. This is the same process that occurs for an erroneous
12 disconnect of a BellSouth end user. Both are handled as a provisioning issue and
13 not a maintenance issue.

14

15 Q. DOES BELLSOUTH HAVE ONLY 2 TRAINED EMPLOYEES TO HANDLE
16 LNP PROBLEMS?

17

18 A. No. BellSouth's response to Ms. Berger's (pg. 22) assertion that BellSouth has
19 only two trained employees to handle LNP problems is as follows. Again, in all
20 cases AT&T is in control of when a number ports. BellSouth has a highly trained
21 staff of employees in its LCSCs (over 400 trained in LNP) to provide assistance
22 prior to AT&T accepting responsibility of the ported number. These employees are
23 scheduled Monday - Friday 8:00 a.m. to 6:00 p.m. Additionally, BellSouth created
24 a unique center in the CWINS, which is staffed by 13 employees and provides
25 coverage to assist ALECs with post port problems. Hours of coverage are

1 8:00 a.m. to 12:00 a.m. (midnight) Monday through Friday and Saturday 8:00 a.m.
2 to 4:00 p.m. After hours coverage is handled by personnel within the center who
3 are able to contact appropriate personnel to handle emergency situations on a 24-
4 hour, 7 day a week basis.

5

6 Q. PLEASE DISCUSS AT&T'S ALLEGATIONS THAT BELLSOUTH HINDERS
7 CHANGES OF SERVICE AND/OR OTHER CUSTOMER REQUESTS.

8

9 A. In Ms. Judy Wheeler's testimony (pg. 7) she contends that "BellSouth's inability to
10 properly process service requests" has resulted in prospective customers having to
11 wait an unreasonable amount of time to switch to AT&T Broadband. Ms. Wheeler
12 offers no substantiating data to support this claim. BellSouth has a highly trained
13 staff, as well as proven processes, to effectuate a transition of service to an ALEC
14 such as AT&T Broadband in a timely manner.

15

16 Q. PLEASE ADDRESS PAGE 17 OF MS. WHEELER'S TESTIMONY THAT
17 AT&T RECEIVES REJECT AND/OR CLARIFICATION NOTICES FOR
18 INCORRECT CUSTOMER INFORMATION ALTHOUGH THE ALEC USED
19 THE BELLSOUTH CUSTOMER SERVICE RECORD TO OBTAIN THE
20 INFORMATION SUBMITTED?

21

22 A. There are numerous situations in which it would be entirely proper for an ALEC
23 LSR to be rejected even if the ALEC used information on the Customer Service
24 Record ("CSR"). Occasionally, the CSR will obtain information such as a grand
25 fathered customer address, i.e., the customer may live in an area that now requires a

1 valid 911 address. The Yellow Page heading code could now be invalid or the
2 listing format could have changed or be obsolete. Also, if the ALEC has used
3 abbreviations on the request where a decision could not be made to the meaning or
4 intent, these would all need to be questioned in order for the LSR to be issued
5 correctly. Examples would need to be provided to validate the exact meaning of
6 this issue.

7

8 Q. PLEASE DISCUSS THE ISSUE CONCERNING CLARIFICATIONS AND/OR
9 REJECTS THAT CONTAIN INADEQUATE INFORMATION TO
10 EXPLAIN THE REJECT AND/OR CLARIFICATION?

11

12 A. Ms. Wheeler's testimony (pg. 17) asserts that BellSouth Service Representatives do
13 not provide clear and distinct reject and/or clarification reasons. All of Bellsouth's
14 Service Representatives have been trained to give clear and distinct reject and
15 clarification reasons. Most calls that are received in the LCSC are to question the
16 validity or dispute the clarification and/or reject and not to have the Service
17 Representative decipher the reason for the reject and/or clarification. If the ALEC
18 does contact the LCSC Call Center to question the wording of a clarification, the
19 LCSC Service Representative would check either in LEO for an electronic order or
20 in LON for a manual order and provide an explanation to the ALEC.

21

22 Q. PLEASE DISCUSS THE ISSUE OF RECEIVING A CLARIFICATION NOTICE
23 AFTER RECEIVING A FOC.

24

25

1 A. I will respond to Ms. Wheeler's testimony (pg. 18) wherein she alleges that
2 BellSouth issues clarifications after a service order has been FOC'd. A
3 clarification can be sent after a FOC is submitted if an ALEC LSR error is not
4 identified in screening. These clarifications should be exceptions. Most additional
5 service order information needed after FOC'ing such as a busy cable pair, etc.,
6 should be referred to the ALEC via a jeopardy notification.

7

8 Q. DOES THE LCSC PROVIDE ADEQUATE CUSTOMER AND/OR TECHNICAL
9 ASSISTANCE?

10

11 A. On pgs. 18-19 of her testimony, Ms. Wheeler states that BellSouth's LCSC does
12 not provide adequate customer and/or technical assistance. To the contrary, the
13 LCSC is available with a fully trained staff of Service Representatives to provide
14 customer assistance. The LCSC can assist or direct the customer to the appropriate
15 contact for assistance in submitting an LSR or responding to a clarification.
16 However, the LCSC Service Representatives are not trained or responsible to
17 provide technical provisioning or maintenance assistance.

18

19 Q. PLEASE RESPOND TO MS. WHEELER'S TESTIMONY (PG. 19)
20 CONCERNING THE NUMBER OF PONS A CUSTOMER CAN INQUIRE
21 ABOUT ON EACH CALL TO THE LCSC?

22

23 A. LCSC Service Representatives are instructed to assist with up to five PONS per call
24 in order to give all ALECs an opportunity for expeditious service.

25

1 Q. PLEASE DISCUSS WHAT STEPS BELLSOUTH HAS TAKEN TO REDUCE
2 CALL ANSWERING TIMES IN THE LCSC?

3

4 A. I will address Ms. Wheeler's testimony (pgs. 19-20) and Ms. Berger's testimony
5 (pgs. 23-24) regarding call answering times in the LCSC. While the LCSC has
6 experienced problems in the past with hold times that were longer than desirable,
7 the April 2001, May 2001 and June 2001, Monthly State Summary (MSS) reflects
8 that the Average Speed of Answer for the LCSC is at parity for the wholesale
9 analogue as it is with the retail. This improvement is largely due to the creation of
10 the Fleming Island LCSC that was placed on-line in late January 2001. Operating
11 primarily as a call center, the Fleming Island LCSC has been able to handle calls
12 faster and more effectively. Additionally, this allows the Birmingham and Atlanta
13 LCSCs to concentrate on processing orders, thus creating efficiencies.

14

15 Q. PLEASE DISCUSS THE BELLSOUTH PORTING PROCESS AND
16 INTERVALS.

17

18 A. On pgs. 11-12 of Ms. Wheeler's testimony, she alleges that BellSouth does not
19 provide parity to AT&T when transitioning a BellSouth customer to AT&T
20 Broadband. Furthermore, she also contends that BellSouth transitions its
21 residential retails customers in one day but requires four days for ALECs.
22 Ms. Wheeler is not making an appropriate comparison. First, a Retail customer and
23 a Resale customer do get the same due date interval when ordering lines or features.
24 However, number port orders requested by AT&T Broadband require additional
25 time to allow NPAC processing time. The LNP orders are not comparable to a

1 non-port service conversion. BellSouth ported service from an ALEC would take
2 the same amount of time. The ALEC requires the same time to submit an FOC on
3 BellSouth's LSR and NPAC gives the same interval to receive concurrence to port.
4 Therefore, there is parity for like services.
5

6 Q. PLEASE DISCUSS THE ALLEGATION THAT BELLSOUTH HAS
7 INCONSISTENT BUSINESS RULES.
8

9 A. Ms. Seigler is obviously confused on pgs. 15-19 of her testimony when she
10 discusses inconsistent business rules and conflicts between the AT&T stand-alone
11 agreement and information provided by the Account Team. This information deals
12 with the procedures for ordering UNE-P combinations. She refers (on pg. 17) to
13 business rules that do not provide USOCs to be used to populate the TOS field on
14 the LSR. I say this because BellSouth Business Rules never have provided USOCs
15 for UNE-P or any other UNE product. The Business Rules are intended to provide
16 field interdependencies and restrictions and not USOC information. Additionally,
17 she alludes to obtaining ordering information from a stand-alone interconnection
18 agreement, which again is not a document intended to provide detailed ordering
19 information. The correct source for the information is provided in Market Service
20 Descriptions ("MSD"), not only for UNE-P combinations, but also for all UNE
21 products. This information is accessible via the Internet at BellSouth's
22 Interconnection web site. The UNE-P MSD has been available on BellSouth's web
23 site <http://www.interconnection.bellsouth.com/products/html/unes.html> since
24 October of 2000 and provides detailed business rules and ordering procedures.
25

1 Q. PLEASE DISCUSS THE ISSUE OF ERRONEOUS REJECTS AND MISTAKES
2 MADE BY BELLSOUTH'S SERVICE REPRESENTATIVES.

3

4 A. I will respond to Ms. Seigler's testimony (pgs. 18-19) in which she discusses rejects
5 and errors caused by BellSouth. This issue was a case of human error. To address
6 this issue, BellSouth has provided additional training to certain LCSC
7 representatives. AT&T brought this issue to the attention of BellSouth in May.
8 BellSouth completed refresher training to all LCSC representatives on May 23 that
9 corrected the problem. To BellSouth's knowledge, there have been no further
10 problems. BellSouth continues to monitor the quality of the work being performed
11 by the Service Representatives in the LCSC. Where areas of deficiency are
12 discovered, BellSouth does provide additional training and resources to correct the
13 problem in order to meet the expectations of both the ALECs and BellSouth.

14

15 Q. DOES BELLSOUTH MAKE LAST MINUTE CHANGES IN ITS ORDERING
16 PROCEDURES?

17

18 A. No. In Ms. Siegler's testimony (see pgs. 19-20) where she discusses last minute
19 changes made by BellSouth in ordering procedures, she hits the nail on the head
20 when she describes the problem as AT&T's misunderstanding of the BellSouth
21 Business Rules. The Business Rules were explained to Ms. Seigler in detail by the
22 Account Team. Additionally the MSD, which I previously discussed, provides a
23 detailed description of the USOCs, ordering procedures and Business Rules for
24 UNE-P. It is apparent that Ms. Seigler is not familiar with the information that
25 BellSouth provides on this web site.

1 Q. PLEASE RESPOND TO THE ALLEGATIONS OF ACCESS INTEGRATED
2 CONCERNING INSTANCES OF DISCRIMINATORY CONDUCT ON
3 PROVISIONING AND MAINTENANCE ISSUES.
4

5 A. Mr. Rodney Page of ACCESS Integrated (hereinafter "ACCESS") has presented
6 several affidavits of individuals that present a number of isolated events concerning
7 BellSouth's wholesale operations (Section II). Although I consider these as
8 random and not representative of the overall service BellSouth provides to
9 ACCESS and its end users, I will address each complaint as it relates to wholesale
10 service using the information, if any, that is available to BellSouth.

11
12 Concerning the testimony of Cathy Sparks of Carpet Connections (see
13 Exhibit RP-1, pgs. 2-3) and Carpet Connections' access to Directory Assistance,
14 our records indicate that the D Order discontinuing billing from BellSouth was
15 completed on August 24, 2000. The associated N Order to establish billing for
16 ACCESS completed August 24, 2000, as well, but encountered a post completion
17 billing error that required manual correction. The correction was completed on
18 September 19, 2000 and processed to downstream systems including Operator
19 Service/Directory Assistance (OS/DA). The end user was listed in the OS/DA
20 database at that time. These types of post-completion errors occasionally occur in
21 BellSouth's completion process and although the delay in correcting the error was
22 excessive in this case, the same scenario can happen to a BellSouth end user, to
23 BellSouth's affiliates or during processing of any order through BellSouth's legacy
24 systems. BellSouth does have processes in place to identify these situations and
25 expeditiously resolve these issues.

1 I will also respond to the testimony of Carol Duffey, Service Representative, and
2 ACCESS' problems with access to telephone numbers (see Exhibit RP-1, pgs. 6-7).
3 Ms. Duffey asserts that BellSouth refused access to telephone numbers 678/772-
4 8835 and 678/772-8845 for end user IMMCO. Additionally, Ms. Duffey asserts
5 that IMMCO subsequently switched their service back to BellSouth and was able to
6 obtain the requested number assignments not available to ACCESS.

7

8 Generally, BellSouth's number assignment policy used to administer telephone
9 numbers for itself, its end users, its affiliates and ALECs is the same. For
10 residential numbers that have been disconnected, a 90-day waiting period and for
11 business numbers an interval of one year is required prior to the numbers being
12 available for reassignment.

13

14 This attempts to ensure that the new end user does not receive calls for the previous
15 user of the telephone number.

16

17 Although Ms. Duffey may have dialed the requested business numbers and received
18 an intercept message, the numbers had not cycled through the required waiting
19 period.

20

21 Ms. Duffey correctly asserts that the end user migrated back to BellSouth; however,
22 incorrectly states that BellSouth allowed the end user IMMCO to have the numbers
23 previously requested by ACCESS. Both numbers are on intercept and are still
24 cycling in the required waiting period.

25

1 The affidavits of Carol Roberts, Mary Parker and Raymond Parker (see Exhibit
2 RP-1, pgs. 12-15) and their difficulty working with BellSouth technicians trouble-
3 shooting problems on their lines.

4
5 The information presented by these individuals conflict with the information
6 BellSouth has recorded as to the events described by the above affiants. BellSouth
7 records indicate that a problem existed with inside wiring that was ultimately fixed
8 by moving the network interface away from a leaking air conditioning unit. First,
9 the additional jack was ordered on April 4, 2001. There was no service order
10 activity on this account in February 2001 as the affiants stated. After the jack was
11 added on April 4, 2001, ACCESS reported a trouble on April 8, 2001 indicating
12 that the jack was not working correctly. The trouble was closed on April 9, 2001 at
13 12:50 p.m. by an outside technician indicating that no trouble was found with the
14 circuit. On April 9, 2001, a trouble again was reported by ACCESS indicating that
15 there was no dial tone on the circuit. The circuit was tested with a Hard Ground
16 and was dispatched outside for repair. The BellSouth technician found no trouble
17 on the circuit to the demarcation point (DMARC) and requested authorization for
18 inside repair from ACCESS. Once inside repair was authorized, the trouble was
19 cleared by repairing deregulated inside wire. The repair was completed on
20 April 10, 2001 at 10:10 a.m. ACCESS initiated a service order to move the
21 DMARC on April 14, 2001. The service order was to move the DMARC because
22 it was getting wet from an AC unit causing the hum and static on the lines. The
23 DMARC was moved per the service order and the problems with the jacks and hum
24 and static on the lines have not been reported since.

25

1 Additionally, these three affidavits allege that BellSouth technicians engaged in
2 unauthorized forwarding of calls to Parker's competitor on April 10, 2001. Having
3 been informed of these allegations by a letter dated May 2, 2001 from ACCESS to
4 Phil Jacobs at BellSouth, BellSouth investigated the matter.

5
6 As part of its investigation, BellSouth reviewed customer service records and call
7 detail records as well as conducted interviews of Mr. Parker and four BellSouth
8 employees, one of whom was the service technician in question. This investigation
9 revealed that Call Forwarding was activated on the telephone line for Parker from
10 10:36 a.m. on April 10, 2001 until this feature was deactivated at 11:27 a.m. that
11 same day. However, the BellSouth service technician in question was working at
12 two other customer locations at all relevant times, and BellSouth has no reason to
13 believe that the service technician had anything to do with activating the Call
14 Forwarding feature as has been alleged.

15
16 BellSouth records reflect that the service technician placed testing calls from
17 another customer's premises (a drywall company) minutes before the Call
18 Forwarding feature was activated on Parker's telephone line. Two minutes after the
19 Call Forwarding feature was activated on Parker's telephone line, the service
20 technician closed out the drywall company assignment and was dispatched to
21 another customer's location (a military facility). At 11:05 a.m. on April 10, 2001,
22 the service technician signed for the telephone room key at the military facility,
23 which the service technician returned twenty minutes later. The sign in log for the
24 military facility reflects that the service technician signed the telephone key back in

1 at 11:25 a.m., two minutes before the Call Forwarding feature was activated at
2 11:27 a.m.

3
4 In short, both immediately before and immediately after the Call Forwarding
5 feature was activated and two minutes before the feature was deactivated, the
6 service technician in question was somewhere else. The service technician
7 steadfastly denies activating the Call Forwarding feature on Parker's telephone line
8 and insists that he does not know who competes against Parker or the names (let
9 alone telephone numbers) of any monument companies in Albany. Neither of the
10 two telephone directories published in Albany contains a listing of the competitor
11 to which Parker's calls were forwarded.

12
13 Based on its investigation, BellSouth has been unable to uncover any evidence that
14 its service technician caused incoming calls of Parker to be forwarded to a
15 competitor. While the Call Forwarding feature was activated on Parker's telephone
16 line for approximately 50 minutes on April 10, 2001, and while BellSouth regrets
17 any inconvenience caused to ACCESS' customer, BellSouth has no reason to
18 believe that any of its employees were involved. This is particularly true given that
19 the competitor's telephone number to which some calls to Parker were forwarded is
20 not generally available. The results of BellSouth's investigation of this matter were
21 communicated to Mr. William T. Wright, President of ACCESS, by a letter from
22 Hubert Hogeman, BellSouth's Chief Counsel – Marketing, on May 30, 2001.

23
24 Q. PLEASE COMMENT ON KMC'S PROBLEMS WITH T-1 LINES.
25

1 A. Mr. Mario Espin, on page 4 of his testimony, alleges that BellSouth fails provision
2 circuits following the prior issuance of a firm order confirmation and fails to send
3 timely Pending Facility notices. The PF report that can be viewed on BellSouth's
4 web site <https://clecview.bellsouth.com/> provides an ALEC with notification of
5 orders that are "Pending Facilities". Once an order enters this status, the order
6 cannot be fulfilled until the facility issue is reconciled. This report provides the
7 "Estimated Completion Date (ECD)/Estimated Service Date (ESD)" once it
8 becomes available in the SOCS database. No additional status is available, nor
9 should the customer expect any until such time as this date is reached or the order is
10 no longer held in a "PF" status.

11

12 In summary, these reports provide data to ALECs within the same time frames that
13 BellSouth provides such information to its own end users calling with a question
14 concerning their service request. This is also the same data available to BST retail.

15

16 Q. PLEASE DISCUSS KMC'S ALLEGED PROBLEMS WITH LACK OF
17 FACILITIES FOR T1 LINES, UNRELIABLE FIRM ORDER
18 CONFIRMATIONS, INADEQUATE RECORDS TO DETERMINE FACILITY
19 STATUS, AND LATE LACK OF FACILITY NOTICE.

20

21 A. Mr. Espin (pgs. 4-9) and Mr. Jim Sfakianos (pgs. 3-6) discuss a lack of facilities
22 contributing to a problem that results in BellSouth's failure to provision T1 circuits
23 based on the date returned on the FOC. For the month of July, BellSouth's records
24 indicate that out of 38 DS1 orders worked for KMC in the state of Florida, only one
25 was missed for lack of facilities, two others were missed for other BellSouth

1 reasons i.e. load, or wiring errors. Neither Mr. Espin nor Mr. Sfakianos mentions
2 that 12 orders were missed for KMC reasons and that KMC is equally as prevalent
3 to cause missed commitments. Mr. Espin and Mr. Sfakianos both inaccurately
4 describe BellSouth's FOC as a confirmation that BellSouth facilities are assured.
5 BellSouth's FOC is a confirmation that the order has been entered into BellSouth's
6 legacy system and is not a guarantee that a facility is available. BellSouth's due
7 date commitment is the same commitment that is provided to a BellSouth end user--
8 the date BellSouth strives to provision service barring any unforeseen facility,
9 manpower shortages, or acts of God.

10

11 Q. PLEASE RESPOND TO THE REPEAT TROUBLES ALLEGED KMC.

12

13 A. Repeat troubles are primarily a result of an intermittent trouble condition that may
14 or may not be present to allow immediate identification and problem resolution.
15 Intermittent trouble conditions could reside in the ALEC network, BellSouth
16 network, or the customer provided equipment (the analysis for which the ALEC is
17 responsible). Mr. Sfakianos (see pg.3- 4) would have you believe a repeat trouble
18 report is totally a BellSouth issue. That is absolutely not the case. When ALECs
19 make a trouble report to BellSouth without trouble test results that accurately
20 isolate the problem to the BellSouth network, and define the presence of the trouble
21 condition, immediate resolution of the problem is doubtful. The result is normally
22 a test OK or No Trouble Found ("NTF"). The probability of a repeat trouble report
23 is high. Also, KMC has the opportunity at trouble ticket closure to perform circuit
24 acceptance testing prior to ticket closure. This allows KMC to validate the service
25 is meeting technical parameters before accepting service restoration.

1 Mr. Sfakianos' assessment of premature ticket closures must then include KMC
2 representative's concurrence. As KMC is aware, BellSouth has a chronic group in
3 place to provide extensive analysis and cooperative testing for these intermediate
4 trouble situations. The fact is that the major success of trouble resolution is directly
5 related to the quality of KMC's trouble isolation testing and maintenance ticket
6 close out acceptance testing. If these functions are performed properly by KMC
7 and chronic reports are used for intermittent troubles then repeat reports would be
8 minimal.

9
10 Q. DOES BELLSOUTH CLOSE A TROUBLE TICKET "NO TROUBLE FOUND"
11 (NTF) WHEN THERE IS A BELLSOUTH PROBLEM ON THE CIRCUIT?

12
13 A. No. Mr. Sfakianos (pg. 4) has supplied no data to substantiate his claims.
14 BellSouth's procedures certainly do not support closing a trouble ticket to NTF if
15 there is a BellSouth problem apparent on the circuit. There may be times, as
16 discussed above, when there is an intermittent trouble on the circuit. This could
17 lead to a ticket being closed to NTF only to have a trouble reappear. As stated
18 above, BellSouth has a chronic group in place to assist with this type of trouble.

19
20 Q. PLEASE RESPOND TO KMC'S COMMENTS CONCERNING T-1 CIRCUITS
21 THAT ARE TURNED UP AND LATER EXPERIENCE PROBLEMS.

22
23 A. On page 6 of his testimony, Mr. Espin alleges that BellSouth sometimes turns up a
24 T-1 circuit and that KMC must open a trouble ticket on the circuit immediately
25 after installation. One of the major reasons that this happens is the lack of testing

1 by KMC when BellSouth turns up the circuit. On at least seven of the 38 T-1
2 orders turned up to KMC in July, KMC did not call back after the turn-up
3 notification indicating that there was a problem with the circuits during the turn-up
4 process.

5
6 Q. PLEASE COMMENT ON KMC'S CONCERNS THAT KMC CUSTOMERS
7 SUFFER OUTAGES MORE OFTEN THAN BELLSOUTH RETAIL
8 CUSTOMERS.

9
10 A. Mr. Espin alleges on page 9 of his testimony that KMC's hotel customers
11 experience more outages than BellSouth's retail hotel customers. I do not know of
12 any data that will substantiate this claim. If Mr. Espin would like to provide some
13 substantiating data to this claim, BellSouth will be glad to respond.

14
15 Q. DOES BELLSOUTH MEET WITH KMC ON A REGULAR BASIS TO
16 ATTEMPT TO IDENTIFY AND RESOLVE ISSUES THAT MAY AFFECT
17 BOTH PARTIES?

18
19 A. Yes. BellSouth and KMC have been holding monthly operational meetings for the
20 past two years. Bellsouth has representatives from the Account Team, the CWINS
21 Center, the LCSC and the Customer Support Manager in these meetings. These are
22 the people who can investigate the issues and provide feedback to KMC. If
23 problems are found in BellSouth's systems and/or processes as a result of these
24 investigations, they will be resolved.

25

1 Q. DOES BELLSOUTH PROVIDE THE SAME LEVEL OF SERVICE TO ITS
2 ALECs AS IT DOES TO ITS RETAIL CUSTOMERS?

3

4 A. Yes. On pages 3-4 of Ms. Collette Davis' testimony she states, "BellSouth needs to
5 treat Covad and other ALECs like customers". BellSouth unequivocally provides
6 parity in its customer service level to not only Covad, but to all ALECs, as it does
7 for its retail customers.

8

9 Q. HAS BELLSOUTH IMPLEMENTED AN AUTOMATED CALL
10 MANAGEMENT AND/OR ROUTING SYSTEM?

11

12 A. Yes. BellSouth has an automated call management and routing system in place to
13 handle incoming calls to the LCSC and has devoted considerable resources to
14 improving service at the LCSC. Earlier this year, BellSouth opened the new
15 Fleming Island LCSC in Jacksonville, Florida in order to better meet ALEC needs.
16 As a result of the addition of a third LCSC, answer times experienced by ALECs
17 have been dramatically reduced.

18

19 Q. DOES BELLSOUTH REQUIRE LSR CLARIFICATIONS TO BE REFERRED
20 TO THE REPRESENTATIVE WHO INITIATED THE REQUEST?

21

22 A. No. On the contrary (see Davis, pg. 4), BellSouth has implemented a change and
23 no longer requires LSR clarifications to be referred to the originating LCSC
24 representative who initially requested that the LSR be clarified. Currently, LSR
25 clarifications are handled by whatever LCSC representative who happens to answer

1 Covad's call, although it still may be necessary for that representative to consult
2 with the person who initially put the LSR into clarification.

3

4 Q. DOES BELLSOUTH'S ALLOW ALECs TO SUBMIT ORDERS, LSRs,
5 CLARIFICATIONS, JEOPARDY NOTICES, ETC. VIA E-MAIL RATHER
6 THAN BY FACSIMILE?

7

8 A. No. BellSouth has spent hundreds of millions of dollars to implement the systems
9 necessary to support the electronic ordering of the products and services it offers to
10 ALECs. Although not every product and service can be ordered electronically, this
11 is the exception rather than the rule, and BellSouth has the methods and procedures
12 in place to handle those limited products and services that must be ordered
13 manually via facsimile. Although Covad might prefer to submit an LSR manually
14 via e-mail instead of sending it by fax, BellSouth does not have the systems in
15 place to accommodate such a process, and implementing such systems would create
16 a manually intensive process that BellSouth is endeavoring to move away from.
17 Furthermore, because of the performance measures established by this
18 Commission, BellSouth must keep track of when LSRs are received, and placing a
19 time stamp on an LSR sent via e-mail involves significant challenges. That is not
20 the case with LSRs that are received via facsimile, on which placing a time stamp is
21 a relatively straightforward proposition.

22

23 Q. DOES BELLSOUTH HAVE A SINGLE SOURCE OF ACCURATE DATA FOR
24 SERVICE ORDERS? PLEASE DISCUSS.

25

1 A. No. This is another example of a request by Covad (Davis, pgs. 4-5) for superior
2 rather than nondiscriminatory service. BellSouth does not have a single database
3 that it can consult to ascertain all information concerning the status of every retail
4 order as it moves through the ordering and provisioning process, and BellSouth
5 must review multiple databases to obtain such information. This is no different for
6 the ALECs, although BellSouth has attempted to streamline the process by which
7 ALECs can obtain information on their orders. When Covad seeks the status of an
8 LSR for which it is awaiting a FOC, Covad can review the PONs status report,
9 which is available either electronically or manually. As previously indicated,
10 BellSouth is adding an enhancement to ensure that PONs for xDSL loops are
11 captured on this report. After a FOC has been returned, Covad can access the
12 CLEC Service Order Tracking System (“CSOTS”), which provides the status of all
13 orders for unbundled network elements, including line sharing, both for billing and
14 provisioning purposes. In addition, BellSouth provides Covad with a SWITCH
15 report in Georgia, which allows Covad to check the status of every line sharing
16 order. In response to Covad’s concerns, BellSouth has expanded the frequency of
17 processing and updating information contained in the SWITCH report, so that
18 updates are completed and posted to BellSouth’s website by 8:00 p.m. seven (7)
19 days a week. The information available through the SWITCH report is very
20 accurate, since the system used to generate the report is the same system that
21 provides BellSouth technicians with their work assignments and that technicians
22 use to complete and close out their work orders. BellSouth believes that all the
23 information its provides to Covad to ascertain the status of its order is “accurate and
24 complete,” and Covad has not provided any specific facts to indicate otherwise.

25

1 Q. DOES BELLSOUTH REFUSE TO PROVIDE ALECs WITH A MEANINGFUL
2 OPPORTUNITY TO COMPETE?

3

4 A. Absolutely not. (See Davis, pg. 5) Ms. Davis alleges that BellSouth's Retail order
5 administration centers are run in a far more streamlined and efficient manner. As
6 stated above, BellSouth has provided ALECs such as Covad with more than
7 sufficient access to the LCSC and its systems. BellSouth has not refused to provide
8 ALECs with a meaningful opportunity to compete.

9

10 Q. PLEASE DISCUSS BELLSOUTH'S PLAN TO REDUCE INSTALLATION
11 INTERVALS AND REPEAT TROUBLES ON UDC/IDSL-COMPATIBLE
12 LOOPS.

13

14 A. This response is to Ms. Davis' testimony (pgs. 5-6) wherein she states that Covad
15 has "significant problems" getting BellSouth to provision stand-alone loops.
16 BellSouth is committed to working with Covad to ensure that the UDC-IDSL-
17 compatible loops it purchases from BellSouth meet Covad's needs. In response to
18 Covad's letter, BellSouth reviewed the service orders on each of the UDC-IDSL-
19 compatible loops installed for Covad in Georgia in May 2001. BellSouth
20 determined that some of the trouble reports were attributable to broken or missing
21 wiring, defective heat coils, or vendor issues, which are the same type of problems
22 that can adversely affect service for BellSouth's retail customers. However,
23 BellSouth also concluded that some of the troubles were caused by problems with
24 the Digital Loop Carrier Remote Terminal or Central Office Terminal channel

1 units. BellSouth is developing a corrective action plan to address these issues and
2 will review this plan with Covad.

3

4 Q. HAS BELL SOUTH CHANGED THE NUMBER OF DAYS TO SUBMIT A
5 SUPPLEMENTAL ORDER?

6

7 A. Yes. Covad is correct that BellSouth has modified its procedures such that orders
8 for which an installation appointment has been missed due to Covad or its end user
9 will be cancelled unless Covad submits a supplemental LSR within five business
10 days (Davis, pgs. 6-7). However, notwithstanding Covad's claim to the contrary,
11 orders for which BellSouth caused a missed installation appointment are not
12 cancelled by BellSouth. However, BellSouth is willing to comply with Covad's
13 request. Accordingly, BellSouth will post an ALEC notification letter on the web,
14 with a targeted date of September 4, 2001, to restore the ten-business day process
15 for supplementing an order before cancellation.

16

17 Q. PLEASE DISCUSS COVAD'S REQUEST FOR A TROUBLE RESOLUTION
18 PROCESS AND ESCALATION PATH.

19

20 A. BellSouth is unable to respond to this issue because Covad (see Davis, pgs. 7-8)
21 does not provide any specific facts surrounding the circumstances when BellSouth
22 outside plant construction allegedly "destroys a Covad customer connection or
23 when BellSouth actions effect Covad's service" Once Covad provides such
24 facts, BellSouth will investigate the situation and respond to Covad accordingly.

25

1 Q. DOES BELLSOUTH ENGAGE IN “STEALING PAIRS” AS ALLEDGED BY
2 COVAD?

3

4 A. No. Although Covad has not provided BellSouth with any specific examples of
5 “stealing of pairs,” BellSouth does not intentionally or unintentionally “steal pairs”
6 nor does it “take facilities assigned to Covad customers and use them for BellSouth
7 customers...” A BellSouth technician never even has the opportunity to use or
8 change the status of a pair that currently has working service, whether that service
9 is voice or data. BellSouth’s technicians must go through a comprehensive process
10 to change pairs or identify spare pairs, which involves considerably more than
11 simply “testing the loop for dial tone,” as Covad suggests. BellSouth has a
12 comprehensive training program for its field technicians, which includes materials
13 outlining the proper methods and procedures for viewing and changing pairs.
14 Although BellSouth has every reason to believe that its technicians have been
15 properly trained, in order to address Covad’s concern, BellSouth is willing to direct
16 its front-line field supervisors to reinforce these methods and procedures with their
17 technicians.

18

19 Q. DOES BELLSOUTH HAVE PROBLEMS WITH PROVISIONING LINE
20 SHARING ORDERS?

21

22 A. No. Ms. Davis’ claim (pg. 9) that Covad continues to get reports that line-sharing
23 orders are not flowing through is incorrect. BellSouth has already implemented the
24 changes necessary to resolve this problem. BellSouth’s systems make use of an
25 “auto-complete” capability, which is a standard process within the

1 telecommunications industry and BellSouth. It is efficient and economical and
2 does not contribute to errors in completion notices. However, in response to
3 Covad's concerns that a line sharing order may be "auto-completed" on the due
4 date, even through the cross connects in the central office have not been installed,
5 BellSouth has modified its internal processes so that all service requests that are not
6 provisioned for various reasons (including failure to install cross connects on line
7 sharing orders), a "jeopardy notification" is generated within BellSouth. This
8 jeopardy notification enables BellSouth personnel to notify the ALEC and ensure
9 that an order is not erroneously reflected as "completed" when there is central
10 office work still to be done.

11

12 Q. IS BELLSOUTH'S PERFORMANCE CREATING A SIGNIFICANT
13 OBSTACLE TO SUCCESSFUL COMPETITION FOR ALECS IN FLORIDA?

14

15 A. Absolutely not. Ms. Davis' allegation on page 18 of her testimony is incorrect.
16 Please see the testimony of Mr. Alphonso Varner regarding BellSouth's
17 performance.

18

19 Q. PLEASE RESPOND TO MR. JAMES HVIDAS' TESTIMONY ON BEHALF
20 OF US LEC.

21

22 A. Mr. Hvidas refers to his Exhibit JH-1 as containing 136 trouble tickets on outages
23 experienced on EELs purchased from BellSouth. Out of the 136 troubles, 130 of
24 them are Special Access circuits to which I cannot comment. Only six of the
25 reports were placed as UNE troubles. One of the six has an invalid trouble ticket

1 number and could not be found. The remaining five troubles were not reported on
2 EELs at all, but were reported as either US LEC customers who could not call
3 BellSouth customers or vice versa. Mr. Hvidas alleges that the average clearing
4 time on the troubles on his exhibit was 44 hours. Four of the five troubles reported
5 as UNE troubles had an average clearing time of 1.4 hours. Analysis of the four
6 tickets indicates that three of them did not have a trouble on the BellSouth network.
7 One of the four was experiencing trouble due to trunk blockage. This was resolved
8 by adding additional trunks to a trunk group. Only one of the five troubles carried
9 an excessive clearing time. This trouble was determined to be a routing problem
10 that did take 97 hours to resolve. Mr. Hvidas' allegation that BellSouth fails to
11 provide reliable facilities to ALECs is completely unsubstantiated by his exhibit.
12 There was no facility trouble identified on any of the troubles reported as Local
13 UNE problems.

14
15 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

16
17 A. Yes.

18

19

20

21

22

23

24

25

EXHIBIT LCSC-1
PRELIMINARY RESEARCH-UNE ISSUES
Consisting of 6 pages

Preliminary Research-UNE Issues-May 25 List

Telephone Number	BellSouth N Order Completion/ Date	BellSouth D Order Completion Date	Maintenance Ticket Date	Identified Maintenance Issue	Comments	RRSO FID*
770-945-7218	3/12/01	3/12/01	4/11/01 4/8/01	Replaced network terminating wire Good to demarc		YES
770-466-0450	4/5/01	4/05/01	4/9/01	Dispatched, no trouble found		YES
770-271-8801	4/01/01	4/01/01	No ticket			YES
770-478-6024	4/05/01	4/05/01	5/20/01 4/12/01 4/9/01	Replaced network terminating wire Dispatched, inside wiring trouble- no authorization for inside work Dispatched, inside wiring trouble- no authorization for inside work		YES
678-494-0670	3/13/01	3/13/01	No ticket			YES
678-494-4000	3/30/01	3/30/01	No ticket			YES
404-303-8600	4/10/01	4/10/01	No ticket			YES
404-608-9059	3/25/01	3/25/01	4/30/01	No trouble found		YES
770-590-1784	3/25/01	3/25/01	5/5/01 4/30/01	No trouble found Dispatched- closed to another common carrier		YES
678-432-6190	3/16/01	3/14/01				NO
770-218-0520	3/16/01	3/16/01	5/4/01	Test OK- did not dispatch		YES
770-996-2900	3/16/01	3/16/01	No ticket			YES

}

Research-UNE Issues-May 30 List

Telephone Number	BellSouth N Order /Completion Date	BellSouth D Order Completion Date	Maint. Ticket Date	Identified Maintenance Issue	AT&T Stated problems	Comments	RRSO FID*
954-458-6847	5/02/01	5/02/01	No ticket		No Dial Tone BS worked D order not N order		YES
305-267-6040	5/7/01		5/8/01	CF not working. Customer was not using the correct code to forward the line.	Feature missing. BS did not program the feature	No D order involved C order 5/10/01	YES
561-334-4669	5/10/01	5/10/01	5/21/01	Note—No troubles for No Dial Tone Trouble on 5/21 for Call Forwarding—we corrected in switch.	No Dial Tone for 2 days BS said AT&T's problem then later found defective cable & replaced it		YES
954-924-4949	5/20/01	5/20/01	No ticket		No dial tone failure of pair and cable facility		YES

404-762-1893	4/1/01	4/1/01	6/4/01 4/27/01	NDT, dispatched trouble in customer's equipment NDT tested ok, did not dispatch	No dial tone recording on line		YES
770-487-6106	03/19/01	03/19/01	4/17/01	DPO- No trouble found. Customer told tech that they had been slammed by AT&T. Came back to BellSouth 4/22/01.	No Dial tone disconnected in error		YES
770-439-0438	04/20/01	04/20/01	4/20/01 4/28/01	Dispatched trouble into RCMAG to remove ROL. CF Not working- Customer not paying for feature.	No dial tone disconnected in error		YES
ATLY0102469					No dial tone disconnected in error	Can't Find PON	
770-474-8724	4/26/01	4/26/01	No Ticket Found		Feature missing-BS did not program the feature		Yes

404-608-9059	3/25/01	3/25/01	4/30/01	We dispatched to Demarc. Dial tone good to demarc.	No Dial tone fixed after BS dispatched	May 25 List	Yes
770-218-0520	3/16/01	3/16/01	5/4/01	SLC system failure when call came in to BS. Came clear later same day.	No Dial tone became clear after referral to BS	May 25 List	YES
678-432-6190	3/16/01	3/14/01	No Ticket		Always busy-fixed after referral to BellSouth	May 25 List	YES
ATLB0100298					No Dial Tone	Cannot find PON	
770-590-1784	3/25/01	3/25/01	5/05/01 4/30/01	No Trouble Found Dispatched - Closed to another common carrier	No Dial Tone	May 25 List	Yes
770-948-6382	4/01/01	4/01/01	5/1/01 4/25/01 4/18/01	No Dial Tone reported- bad RT channel unit. NDT- customer isolated to CPE TOK- Referred customer to vendor.	No Dial tone defective cable		YES
770-928-2834	5/04/01	5/04/01	No Ticket		No dial tone Disconnected in error		YES

770-339-6426	5/08/01	5/07/01	5/9/01	Repaired Network terminating wire.	No dial tone open out BS fixed		YES
770-996-2900	3/16/01	3/16/01	No Ticket 6/12/01		No dial tone broken wires	May 25 List	YES
770-784-1375	4/27/01	4/27/01	No Ticket Found		No Dial Tone-open wire		YES
770-923-9570	4/11/01	4/11/01	No ticket		Static Bad Pair		YES
706-232-4802	5/17/01	5/17/01	5/17/01	Wrong OE in switch. Orders should have had the RRSO fid put on by LCSC.	No dial tone		NO
770-222-0063	5/01/01	5/10/01	5/17/01	Front end close out—tested OK.	No dial tone		YES
770-992-0620	5/01/01	5/01/01	5/15/01	Repaired Cut Cable. 300 Pair Cable failure. Not related to the UNE-P conversion.	No dial tone Bs repaired wire at cross box. Customer went back to BS		YES

770-992-0620	3/14/01	3/14/01	6/1/01 5/25/01 5/20/01	Can't be heard dispatched no trouble, found ok Tested OK customer declined dispatch Dispatched, replaced protector	Noise on line BS replaced cable pair		YES
770-945-7643	5/04/01	5/04/01	5/21/01	Central Office Equipment Problem Note—this customer had lots of troubled before they converted to AT&T.	No dial tone BS repaired Frame		YES
770-393-2538	4/27/01	4/27/01	No Ticket		Constant noise on line BS repaired defective facilities . May be IDLC		YES

*Please Note the Account team only has access to N orders only.

EXHIBIT LCSC-2
LCSC-RESALE
Consisting of 3 Pages

LCSC-Resale	6/11/01-6-15-01		7AM	8AM	9AM	10AM	11AM	12N	1PM	2Pm	3PM	4PM	5PM	6PM	7PM	Total
Call Reason:																
Question validity of Clarification				4	6	2	5	2		2	1	1				23
Extended Due Dates						3			1							4
Order Status				2				2		1						5
Checking to validate address					2		2	1		1						6
ERROR on order			1	3	2		2	3		2						13
Clarify In error				2			1									3
MA status																0
Cancel																0
Error corrections/order cpx, csr not updated			3	2			1									6
Denials/Restorals								1								1
Repair Calls						1										1
PIC QUESTIONS				1												1
Mis-directed call					1	1										2
Features left off order that were on LSR				2					1							3
CSR's not correct									3							3
Check why order not complete, past due date				1				1								2
Misc Questions				3	1		2		6	2						14
Disc in Error				2			1									3
rejected pon			1	3	1			2	2			2				11
TOTAL			5	25	13	7	14	12	13	8	1	3	0	0		101

LCSC-Resale	6-18-01/6-22-01	7AM	8AM	9AM	10AM	11AM	12N	1PM	2Pm	3PM	4PM	5PM	6PM	7PM	Total
Call Reason:															
Question validity of Clarification			3	4	2	4	2	2	1	1					19
Order Status					2	1	1								4
Disconnected by BS COU not authorized															0
Checking to validate address			1		3		1	2							7
ERROR on order				2			4		2						8
Clarified in error															0
Cancel						1									1
Internal Call															0
Error corrections/order cpx, csr not updated				1			1								2
Denials/Restorals								1							1
Repair Calls							1		1						2
Mis-directed call					3										3
AO status check								1							1
Misc Questions		1	7	1		4	3	4	2						22
Memory Call CFn					1										1
VMS not added							1								1
Escalation				1											1
Check order nt comp past dd							1								1
rejected pon				1	1			1							3
TOTAL		1	11	10	12	10	15	11	6	1	0	0	0		77

LCSC-Resale	6-25-01/6-29-01	7AM	8AM	9AM	10AM	11AM	12N	1PM	2Pm	3PM	4PM	5PM	6PM	7PM	Total
Call Reason:															
Question validity of Clarification			8	4	1	3	1	4	1	1					23
Order Status				3	2						1				6
Disconnected by BS COU not authorized															0
Checking to validate address					2		2								4
ERROR on order			2							1					3
Clarified in error				1				1							2
Cancel															0
Internal Call															0
Error corrections/order cpx, csr not updated					2										2
Denials/Restorals															0
Repair Calls				1		1	1								3
Features left off csr					3			2							3
Mis-directed call					1										1
CSR not correct				1	1										2
Escalation												1			1
PIC questions		1				1	1		1						1
Disc in error									1						2
AO status check															0
Misc Questions			6	1		4	2	1	3						17
Billing ?				1											1
Who CLEC belongs to and whn conv done															5
Unable to submit LSR bcz of PSO				1											1
Memory call cfn					2										
Wxtended due date						2						1			1
rejected pon					2										2
TOTAL		1	16	13	16	11	7	8	6	2	1	2	0		80