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3 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
4 **REBUTTAL TESTIMONY OF BERNADETTE SEIGLER**
5 **ON BEHALF OF**
6 **AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.,**
7 **AT&T BROADBAND PHONE OF FLORIDA, LLC,**
8 **AND TCG SOUTH FLORIDA, INC.**

9
10 **DOCKET NO. 960786-A-TL**

11
12 **OCTOBER 3, 2001**
13

14 **Q. PLEASE STATE YOUR NAME, ADDRESS AND EMPLOYMENT.**

15 A. My name is Bernadette Seigler. My business address is 1200 Peachtree Street, Atlanta,
16 Georgia. Currently I am employed by AT&T Corp. (AT&T) as District Manager, AT&T
17 Local Services Access Management for Local Interconnection in AT&T's Southern
18 Region. I am responsible for ensuring, at the most basic level, that AT&T is able to
19 successfully send and complete orders sent to BellSouth Telecommunications, Inc.
20 (BellSouth) for the provision of local exchange service.

21 **Q. PLEASE DESCRIBE YOUR BACKGROUND AND PROFESSIONAL**
22 **EXPERIENCE AS THEY RELATE TO ISSUES IN THIS PROCEEDING.**

23 A. I received a Bachelor of Arts Degree in Psychology from Rutgers University, New
24 Brunswick, New Jersey in 1984. Additionally I have attended many business-related
25 courses offered by AT&T and BellSouth. Following my graduation from college, I was
26 employed for 6 years in the medical products industry, and I have been employed for the
27 last 10 years in the telecommunications industry.

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1 I joined AT&T in 1990 as an Account Executive selling services to business customers in
2 northern New Jersey. From 1992 until 1995, I held increasingly responsible positions in
3 various AT&T sales, marketing and customer support units. In 1995, I joined the AT&T
4 Local Cross Strata organization as a Product & Offer Manager. I was on the team
5 responsible for the planning and implementation of AT&T's strategy for entering the
6 Local Services market throughout the United States. In late 1996, I relocated to Atlanta,
7 Georgia to join AT&T's Regional Local Product Management & Delivery organization.
8 From 1996 until early 2001, I held various positions that have afforded me the
9 opportunity to gain expertise in the following areas: (1) local and directory listings
10 ordering and associated methods and procedures with BellSouth; and (2) AT&T's
11 ordering systems and interconnection with BellSouth. I also participated in many
12 negotiation sessions with BellSouth in support of the above activities as AT&T's Subject
13 Matter Expert to ensure our local business market needs were addressed. My last
14 assignment was to lead AT&T's Business Market Entry into Georgia and Florida using
15 UNE P/Switched Combinations of Unbundled Network Elements.¹ In April 2001, I was
16 promoted to District Manager, AT&T Local Services Access Management for Local
17 Interconnection in the Southern Region, which includes Florida.

¹ As used in this affidavit "UNE" refers to unbundled network elements ordered by AT&T from BellSouth; and "UNE-P" refers to the unbundled network element platform, which is the combination of unbundled loop and port.

1 **Q. HAVE YOU TESTIFIED IN OTHER REGULATORY PROCEEDINGS IN THE**
2 **PAST?**

3 A. I have not submitted written or oral testimony in any other regulatory proceedings. I have
4 submitted affidavits in regulatory proceedings in the states of Georgia, Alabama,
5 Louisiana, Mississippi, Kentucky and South Carolina.

6 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

7 A. I am testifying on behalf of AT&T, TCG, and AT&T Broadband regarding BellSouth's
8 failure to provide nondiscriminatory access to network elements, Issue 3 in this
9 proceeding. BellSouth's failure has significantly impeded AT&T's ability to enter the
10 local exchange market for business customers. My testimony specifically replies to and
11 rebuts the testimony of BellSouth witness W. Keith Milner before this Commission. In
12 his testimony, Mr. Milner states that he is addressing the Commission's Issue 3 by
13 describing BellSouth's purported compliance with Checklist Item 2 (Milner Affidavit at
14 34 *et seq.*), testifying that BellSouth provides alternative local exchange carriers (ALECs)
15 with nondiscriminatory access to network elements. My testimony will explain that
16 although BellSouth asserts that it provides "access" to a large number of network
17 elements, that access on too many occasions has been inconsistent, difficult and costly to
18 AT&T and its customers, and therefore has not been the type of nondiscriminatory access
19 contemplated by Sections 251 and 271 of the Telecommunications Act of 1996 (the Act).

1 **Q. WHAT SPECIFIC ISSUES WILL YOUR TESTIMONY ADDRESS?**

2 A. In my testimony I will describe several of the more significant difficulties that AT&T has
3 encountered in its efforts to use BellSouth's UNE-P to provide small business customers
4 with AT&T's All in Onesm service. AT&T's All in Onesm service enables AT&T to
5 combine local, intraLATA, long distance, calling card, toll free and World Net services
6 into a billing plan that includes a simple pricing structure and a discounted monthly rate.
7 The difficulties that AT&T has encountered have been due to the failure of BellSouth to
8 meet its obligations under Sections 251 and 271 of the Act to provide just, reasonable and
9 non-discriminatory access to unbundled network elements.²

10 AT&T's use of UNE-P is a continuation of its attempts to enter the local exchange
11 business market that began with the passage of the Act in 1996. AT&T first attempted to
12 enter the local exchange business market in 1996 and 1997 through the ordering of
13 BellSouth's total services resale (TSR) product in Georgia. After months of testing,
14 AT&T determined that it would not be in the best interest of its local exchange business
15 customers nor in the best business interests of AT&T to enter the business users' local
16 market by means of BellSouth's TSR offering. Our tests proved that BellSouth's TSR
17 would be below AT&T's standards for quality, service and reliability. In addition, the
18 costs to AT&T for TSR were significant and far too great for AT&T to be able to offer
19 the service profitably. AT&T determined that its customers' needs would best be served

² In the course of reviewing prior Section 271 applications, both the Federal Communications Commission (FCC) and the Department of Justice have stressed that "it is critical that competitive LECs have the ability to enter the local exchange market through the use of combinations of UNEs." *Application of BellSouth, et al. for In-Region, InterLATA Relief Pursuant to Section 271 for Louisiana*, CC Docket 98-121, ¶ 141 (1998) (citing Department of Justice Evaluation, at 36). As with any checklist item, an ILEC has the burden of demonstrating that combinations of UNEs are available "as a *practical and legal matter*." *Id.* ¶ 163 (emphasis added).

1 by finding a method other than TSR by which to provide local services to small and large
2 business customers. Throughout 1997 and 1998, AT&T proceeded to roll out AT&T
3 Digital Link (ADL) service, which enabled large business customers (those with T1.5
4 access) to add local calling capabilities to their AT&T service. AT&T first offered ADL
5 in Georgia, then rolled the product out in Florida, Tennessee and North Carolina.
6 Eventually ADL was also rolled out in South Carolina, Louisiana, Kentucky, Alabama
7 and Mississippi. Further, AT&T has attempted to provide local exchange service to
8 small business customers through purchasing the use of loops from BellSouth, UNE-L.

9 As a result of BellSouth's failure to meet its obligations under the Act, business
10 customers have been deprived of the benefits of full and open competition, and in some
11 cases those who elected to switch from BellSouth to AT&T have suffered service delays
12 and even loss of service. These challenges have both delayed and made more difficult
13 AT&T's effective entry into the business user market using UNE-P. Further, they have
14 caused disruption and inconvenience to business customers who chose to use AT&T as
15 their local carrier.

16 **THE IMPORTANCE OF THE BUSINESS-USER MARKET SEGMENT**

17 **Q. WHAT IS THE IMPORTANCE OF THE BUSINESS USER MARKET TO**
18 **AT&T?**

19 **A.** In addition to AT&T's desire to serve residential customers, small business consumers
20 also comprise a very important market segment for AT&T. Because many small
21 business users typically order multiple lines and maintain high volumes of activity on

1 these lines, the revenues from this market segment are substantial. Indeed, because
2 businesses account for such significant source of revenue for any local exchange carrier,
3 including BellSouth, ALECs such as AT&T would find it very difficult to succeed
4 without a significant presence in the business market. In addition, an ALEC that does not
5 establish itself as a substantial and reliable supplier of business-oriented telephone
6 services in addition to serving residential customers would have a difficult time gaining
7 the credibility and critical mass necessary to compete successfully in the market over the
8 long term. For this reason, the challenges to entry caused by BellSouth's actions and
9 shortcomings take on added importance.

10 In response to my comments, Lynette Nall, the BellSouth Local Carrier Services Center
11 (LCSC) staff support representative at the meeting, finally acknowledged that BellSouth
12 knew from the beginning that the use of "D" and "N" orders was not the preferred way to
13 process UNE-P conversions, but that it was the best they could come up with at the time.
14 She further said that BellSouth has had a team in place for some time to address the issue
15 and to create a "single C-order" (change order) for UNE-P conversions and other services
16 to prevent the loss of dial tone. At the meeting Ms. Nall said that BellSouth hopes to
17 have this project completed *by the end of the year 2001*, but would not make a firm
18 commitment to that schedule. Jim Marziarz, BellSouth's UNE product manager,
19 confirmed that BellSouth was addressing the problem as described by Ms. Nall. The
20 ALEC community, including AT&T, advised BellSouth that the estimated delivery of
21 this solution by end of year 2001 is not an acceptable timeframe because until they fix the
22 problem, more ALEC customers will continue to lose dial tone when converting to UNE-

1 P. Even more distressing, and in spite of the pleas of AT&T and other members of the
2 ALEC community, BellSouth in preparing the formal minutes of the May 23 meeting
3 (Exhibit BMTS-2) announced that the target implementation date for the “single C-
4 order” would be pushed back even further to *early 2002*.

5 **Q. PLEASE PROVIDE SOME EXAMPLES OF HOW THE LOSS OF DIAL TONE**
6 **PROBLEM HAS IMPACTED AT&T CUSTOMERS.**

7 A. By way of example, one AT&T UNE-P retail establishment customer lost dial tone on
8 Saturday, May 5, 2001. Dial tone was not restored to this customer until Tuesday, May
9 8, 2001. *See* letter from Denise Berger to Ken Ainsworth, attached to this testimony as
10 Exhibit BMTS-4, outlining these UNE-P disconnect problems, and specifically
11 Attachment 2 to that letter. As that document shows, the AT&T representatives working
12 this problem had to make numerous calls and were transferred from one BellSouth
13 representative to another before finally having the matter resolved, nearly three full days
14 later.

15 **Q. DO YOU HAVE EXAMPLES OTHER THAN THOSE IDENTIFIED IN THE**
16 **BERGER LETTER?**

17 A. Yes. In addition to the situation relating to the AT&T retail customer described above,
18 and the other incidents referred to in the Berger letter, AT&T has experienced still other
19 examples of customers losing dial tone because of BellSouth’s lack of coordination in the
20 “D” and “N” order process that have occurred in Florida and Georgia over the past

1 several months. I will describe some examples of the types of incidents experienced by
2 AT&T UNE-P customers.

3 On May 31, 2001, the day before the conversion of an AT&T customer in Miami, Florida
4 to UNE-P was scheduled, BellSouth worked its D order. On June 1, 2001 the customer
5 called AT&T to say that it did not have dial tone on any of its 11 lines. It took BellSouth
6 about 3 hours to get our customer back in service once the outage was reported to
7 BellSouth. However, the AT&T customer was without dial tone for a total of
8 approximately 13.5 hours. Another incident involved a customer in Ft. Lauderdale,
9 Florida with only one telephone line who was out of service for 2 hours and 45 minutes
10 on June 4, 2001, the day the customer's service was converted from BellSouth to AT&T
11 UNE-P. This one line is the only way for his customers to reach him, and BellSouth's
12 processing of the D order before the N order resulted in his not having access to his
13 customers, which are his source of revenue, for the period of the outage. In another
14 example, an auto service business customer in Miami, Florida called AT&T on the
15 afternoon of June 26, 2001, the day he was converted from BellSouth to AT&T UNE-P,
16 to report a loss of dial tone on his 2 lines. Service was not restored until the following
17 afternoon, over 24 hours later. BellSouth's explanation for this loss of service, again, was
18 that the D order was worked before the N order.

19 **Q. WHY DOES AT&T VIEW THESE LOSS OF DIAL TONE INCIDENTS AS**
20 **ESPECIALLY TROUBLING?**

1 A. The fact that numerous loss-of-dial-tone incidents have occurred over the past several
2 months due to BellSouth's "D" and "N" order problem is especially troubling because, as
3 AT&T's volume of UNE-P orders increases, the number of problems experienced likely
4 will increase as well. This situation, if not corrected, will have a significant impact on
5 AT&T's customers and on AT&T's own reputation. Compounding the problem is the
6 customer's perception that the problem must be caused by AT&T, since there were no
7 similar difficulties when local service was provided by BellSouth. Because of this
8 perception, customers are many times inclined to switch back to BellSouth, even though
9 BellSouth is the cause of the problem. Indeed, a related problem that worsens the
10 situation, which was also identified in the UNE-P Users' Group Action Plan, is that
11 BellSouth employees are attempting to win back ALEC customers after conversion, in
12 some cases telling the customer that the loss of dial tone is the fault of the ALEC. *See*
13 items 6 and 8 in the Action Plan, Exhibit BMTS-2.³

14 The unacceptable number of loss of dial tone incidents experienced by customers of
15 AT&T and other ALECs upon conversion demonstrates that BellSouth is not able to
16 provide access to network elements necessary to process AT&T's UNE-P orders in a
17 consistently acceptable, nondiscriminatory manner. These loss of dial tone incidents are
18 disruptive and distressing to customers, causing the customer inconvenience and loss of
19 business, and in the case of customers such as the hospice, threatening the health and well
20 being of those in a customer's care. And because BellSouth's role in the process is

³ See also *In re: Complaint of IDS Long Distance, Inc., n/k/a IDS Telcom, L.L.C., Against BellSouth Telecommunications, Inc., and Request for Emergency Relief*, Docket No. 010740-TP, Filed May 11, 2001, before the Florida Public Service Commission.

1 largely hidden from the customer, AT&T alone faces the customer's anger and
2 disappointment. Because these process failures on the part of BellSouth put AT&T at a
3 significant competitive disadvantage, BellSouth cannot claim to be meeting its
4 obligations to provide nondiscriminatory access to network elements.

5 SUMMARY AND CONCLUSION

6 **Q. DO YOU HAVE ANY CONCLUDING REMARKS TO SUMMARIZE YOUR**
7 **TESTIMONY?**

8 **A. Yes. The BellSouth shortcomings discussed in this testimony evidence serious**
9 **weaknesses that have caused BellSouth to fail to afford AT&T and other ALECs**
10 **nondiscriminatory access to network elements. BellSouth's policies, procedures and**
11 **business rules are not designed nor are they sufficiently developed to handle the orders**
12 **for UNE-P services that AT&T needs to attract and retain business consumers. These**
13 **inadequate rules and procedures have delayed AT&T's access to network elements**
14 **necessary for UNE-P, have made the process more cumbersome and prone to error that it**
15 **should be, and has created instability in the system. This has harmed business consumers**
16 **by causing unwarranted delays in service delivery, undermining their confidence in the**
17 **reliability of their telephone systems, and in some cases actually causing interruption in**
18 **service. Furthermore, not only do customers suffer as a result of BellSouth's failures, but**
19 **because BellSouth's role in the process is hidden from customers, AT&T suffers the**
20 **competitive consequences. Given these shortcomings, BellSouth cannot claim to be**

1 meeting its obligations under the Act to provide just, reasonable and non-discriminatory
2 access to unbundled network elements.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 A. Yes, it does.

5

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**REVISED REBUTTAL TESTIMONY OF
JAY M. BRADBURY
ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.,
AT&T BROADBAND PHONE OF FLORIDA, LLC,
AND TCG SOUTH FLORIDA, INC.**

DOCKET NO. 960786-A-TL

OCTOBER 3, 2001

UNE-P USER GROUP WORKSHOP ACTION PLAN

Revised As Of May 30,2001

ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
1 3/22/01 Also see 2 & 3	IDS Telecom Becky Wellman NewSouth John Fury BellSouth Sandra Davis	Errors prevent N-orders from flowing with D-orders. D-order processed first (separately). LFACS PF's orders since facilities are not reused creating service outage.	06/06/2001	Customer provided real-time example.
2 3/22/01 Also see 1 & 3	Birch Telecom Lacie Hamlin NewSouth John Fury BellSouth Sandra Davis	Loss of dial tone on day of conversion. Only one or two lines going down (sometimes entire account).	06/06/2001	Customer must contact LCSC immediately upon next recurrence. Needs to be observed while it is happening.
3 3/22/01 Also see 1 & 2	Birch Telecom Lacie Hamlin BellSouth Sandra Davis	Order stays in AO status during conversion	06/06/2001	Customer must contact LCSC immediately upon next recurrence. Needs to be observed while it is happening.
4 3/22/01	Talk.com Page Miller BellSouth Constance Coley	New orders with FOC dates do not download to WMC.	06/06/2001	Customer will send new examples to CSM.

UNE-P USER GROUP WORKSHOP ACTION PLAN
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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
5 3/22/01	ITC^DeltaCom Mary Conquest NewSouth John Fury BellSouth Jim Maziarz	When ADSL is added to resale account CLEC cannot convert to UNE-P. CLEC did not add ADSL.	Closed	In a UNE-P arrangement, the CLEC is the network provider and BellSouth is no longer able to provide its ADSL service on that line. With Resale, BellSouth is the network provider and may provide its tariffed ADSL service on the end user's line.
6 3/22/01 Also see 30	ITC^DeltaCom Mary Conquest Birch Telecom Lacie Hamlin NewSouth John Fury BellSouth Jim Maziarz	BST retail employees have been telling end-users that CLEC has generated conversion which created outage.	06/06/2001	BellSouth is investigating.
7 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Sandra Davis	Cancelled orders (mostly call forwarding) created clarifications for "Reason Cancelled"	06/06/2001	BellSouth needs examples at the time clarification sent
8 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Jim Maziarz	What are BellSouth's responsibilities to CLECs with regard to Win Back? How much of BellSouth's process (time frames, reporting and contacts) can be made available?	Closed	Outside of the scope of the User Group.

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
9 3/22/01	Talk.com Page Miller BellSouth Sandra Davis	CSOTS system does not reflect adjusted due dates after LCSC makes changes.	Closed	
10 3/22/01	Talk.com Page Miller NewSouth John Fury BellSouth Kevin Davis	Getting FOCs but not Completes (customer "on/not on")	Closed	For manual orders, the LCSC does not return a Completion Notice (CN) electronically to LENS. If the order was originally generated via LENS, then the CLEC will receive an FOC and an CN. If the CLEC did not receiving CN electronically for orders that they submitted electronically, then they will need to send that specific order number to their account rep for testing.
11 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Tiffany Ray	EDI issues not posted on website.	06/06/2001	Referred to change control. Issue is being addressed by BellSouth Electronic Communications Support Group. ECD will be provided.
12 3/22/01	Birch Telecom Lacie Hamlin BellSouth Jim Maziarz	Are there specific area calling plan USOCs in GA, FL and NC? Carrier notification letter only addresses other six states.	Closed	There are no calling plan USOCs for GA and NC. However, there is one calling plan USOC (UEPAF) for residential conversions in FL. Consult information guide for description of USOC under BellSouth retail calling plans.

Exhibit No. BMTS-2
FPSC Docket No. 960786-T
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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
13 3/22/01	IDS Telecom Becky Wellman NewSouth John Fury BellSouth Sandra Davis	Need flag (indicator) to show when customer has local service freeze.	06/06/2001	Customer provided examples.
14 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Laura Walls	Can the type of call records be included on call flows?	06/06/2001	BBI has formed a working group that will establish and develop documentation process for this information. ECD will be provided.
15 3/22/01	AT&T Ray Sinclair BellSouth Jim Maziarz	Need UNE-P zones (market-based rate) posted on website.	06/15/2001	This information will be posted to the website and is scheduled to be added by June 15, 2001.
16 3/22/01	WorldCom Amanda Hill BellSouth Kevin Davis	Where does CLEC get aspecial access number for remote access call forwarding on electronic orders? Only provided on manual orders.	Closed	Has been referred to Account Team.
17 3/22/01	WorldCom Amanda Hill BellSouth Charlotte Lange Lynette Nall	How to obtain address validation? Can LCSC assist?	06/06/2001	BBR being updated. Release date will be provided.
18 3/22/01	Birch Telecom Lacie Hamlin BellSouth	What is the difference between user transfer calling (ELY2N) and 3-way calling for transfer (ESCWT)?	Closed	ELY2N is Prestige USOC

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
19 3/22/01	WorldCom Amanda Hill BellSouth	Do medical expedites require documentation from doctor?	Closed	No. IM approval is required. Would be normal expedite request for LCSC.
20 3/22/01	Talk.com Page Miller BellSouth Jim Maziarz	When BellSouth 800 number is dialed, will BellSouth report activity to pay phone clearinghouse?	06/06/2001	Exhibit No. BMTS-2 FPSC Docket No. 960786-TI Page 5 of 12

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
21 3/22/01	ITC^DeltaCom Mary Conquest BellSouth Patti Klein	Does Tennessee have market rates for UNE-P pricing?	Closed	The rates for combinations which the Tennessee Regulatory Authority (TRA) has approved are cost based rates for currently combined UNEs, or switch-as-is combinations. BellSouth will combine loop and transport UNEs at cost-based prices as required in the FCC's UNE Remand Order in order to have the exemption from providing local circuit switching in Density Zone 1 of the Nashville MSA. BellSouth is offering non-currently combined UNEs to CLECs at market rates pursuant to negotiated professional services agreements. BellSouth is aware that the TRA has stated its intention to issue a written order in the Intermedia Arbitration case (at its Conference on February 6, 2001), requiring BellSouth to provide CLECs with combinations of network elements which BellSouth currently provides to itself anywhere in its network. This decision is in the context of a two-party arbitration. Unless BellSouth seeks and obtains a stay of the TRA's order, the terms and conditions included in the BellSouth-
22 3/23/01	ITC^DeltaCom Mary Conquest BellSouth Laurel MacKenzie	Will BellSouth include ADUF in UNE training classes?	Closed	BellSouth is developing UNE Billing class that will cover ADUF. The class is scheduled for September 20 - 21 in Birmingham.
23 3/22/01	KMC Telecom Tina General BellSouth Laurel MacKenzie	Will BellSouth offer "beginner" UNE ordering process information?	Closed	BellSouth has split UNE class into four classes: UNE Basic (beginner class) starting in February; DATA UNE in March; Switch Port/Loop in February; and Collocation in April

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24 3/22/01	WorldCom Amanda Hill BellSouth Sandra Davis	What rules surround customer abandonment that result in disconnects?	Closed	When a CLEC's end user is disconnected as an abandoned station, various scenarios may result. If another end user is requesting service at the location and it is not a request for an additional line, the existing service should be disconnected to allow facilities to be reused. Since the current end user is not available to initiate the disconnect request, a disconnect reason of AS is used. If the LCSC receives a request from the CLEC in which the CLEC has advised it is an Abandon Station and if the working service is a BellSouth account, a disconnect order is issued and an "N" Order for the new service. There is no notification required. If the working service is for a different CLEC a "D" order is issued and an "N" order for the new service is issued. A MECHANIZED NOTIFICATION LETTER will be sent to the CLEC whose account is being disconnected. On a new install, the CLEC must indicate if there is existing working service at the end user location. They do this by populating the WSOP field on the End User form with either A (for an additional line) or V (for Aban. If they do not indicate anything in this field, and the LCSC determines that an interfering station condition exists, the order is clarified back to the CLEC.

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
25 3/22/01 Also see 32	All CLECs BellSouth Jim Maziarz	Can BellSouth develop phased process for collecting de-averaged revenues from CLECs?	Closed	The CLEC should contact its BellSouth Contract Negotiator on this matter.
26 3/22/01	Talk.com Page Miller BellSouth Jim Maziarz Tim Miller Sandra Davis	Being charged for unauthorized truck rolls. Technicians were dispatched and should not have been.	Closed	BellSouth has addressed issue by training service reps.
27 3/22/01	Talk.com Page Miller BellSouth Jim Maziarz	Loss notification reports may be inaccurate.	06/06/2001	A coding error with the Loss Notification Report was recently identified and has been corrected. Process being developed. ECD will be provided.
28 3/22/01	All CLECs BellSouth Jim Maziarz	When BellSouth end user moves to CLEC, does billing structure stay the same?	Closed	The end user billing structure is defined by the CLEC and it may bill its end user however it chooses.
29 3/22/01	All CLECs BellSouth Sandra Davis	What is scenario for E in hunting activity?	06/06/2001	The HA Field should be left blank on LSRs for conversion to UNE-P. Pending in change control. Carrier notification will be issued.
30 3/22/01 Also see 6	IDS Telecom Becky Wellman BellSouth Jim Maziarz	BellSouth told CLEC end user that conversion was new line because it was issued as N-order.	06/06/2001	If the conversion is a true conversion then conversion nonrecurring charges should only apply.

UNE-P USER GROUP WORKSHOP ACTION PLAN

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ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
31 3/22/01	Talk.com Page Miller BellSouth Margaret Largent	Are CLECs billed by BellSouth when end user abandons service? CLEC was charged for termination when defective BRI equipment was replace to fix a trouble (dropped calls).	06/06/2001	If BellSouth does not know that the service has been abandoned, BellSouth will continue to bill the BTN or Account number of record until notified to disconnect or a new order comes in to BellSouth for service at the abandoned service address. BellSouth received clarifying questions and is investigating.
32 3/22/01 Also see 25	All CLECs BellSouth Jim Maziarz	Since it took twelve months for BellSouth to develop de-average zone billing, will CLECs have twelve months to pay? Need uniform billing scheme for CLEC community.	Closed	The CLEC should contact its BellSouth Contract Negotiator on this matter.
33 3/26/01	WorldCom Amanda Hill BellSouth Herdy Menina	If an order is sent via EDI, will it be clarified if the due date requested is not available or will BellSouth assign the next available due date?	Closed	If the Desired Due Date cannot be met on orders submitted via EDI then the system will assign the next available due date, as per the Appointment Interval. FOC will be sent with the Assigned Due Date. The orders will not be clarified.
34 3/26/01	Choctaw Communications Amy Lasseigne BellSouth Michael Moore	Need detailed explanation of initial UNE-P bills. They may have been overcharged for Non Recurring Charges	Closed	Customer has received explanation

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35 5/9/01	Talk.com Page Miller BellSouth Sharon Judy	How often is CSOTS updated to reflect date changes?	Closed	SOTS updates daily. However, CLECs should access the Help Guide under their SOTS website https://clecview.bellsouth.com and reference section 1.2 - System Availability for scheduled maintenance/upgrades.
36 5/23/01	CI ² Ruth Wilson Talk.com James Childress BellSouth	Need Account Executive to represent customer throughout all BellSouth subsidiaries.	06/06/2001	
37 5/23/01	Momentum Business Peggy McKay BellSouth Jim Maziarz	Need discussion of the May 18 carrier notification letter regarding the LATA-wide calling plans and what is needed in the Interconnection Agreement?	Closed	Jim Maziarz reviewed this issue during his presentation.
38 5/23/01	Network Telephone Mitch Dantin IDS Telecom Becky Wellman BellSouth Lynette Nail	During conversion, does PIN change? Can PIN be designated by CLEC?	06/06/2001	
39 5/23/01	Birch Telecom Lacie Hamlin BellSouth Lynette Nail	Need some type of documentation with examples of orders that fall out for manual handling (other than those listed on website).	06/06/2001	

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 Revised As Of May 30,2001

ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
40 5/23/01	Birch Telecom Lacie Hamlin Talk.com Page Miller BellSouth Jim Maziarz	What are the charges for PIC changes?	06/06/2001	
41 5/23/01	ACCESS integrated Louise Wilds Talk.com James Childress BellSouth Lynette Nall	LCSC and repair have trouble committing to ownership in a timely manner when there are problems turning up new service. If order has not been completed, who is the owner?	06/06/2001	
42 5/23/01	Birch Telecom Lacie Hamlin BellSouth Lynette Nall	How can pre-order survey be ordered for facilities?	06/06/2001	
43 5/23/01	Intermedia Sherrie Baughman BellSouth Jim Maziarz	Are the Switch CLLI codes the same within density Zone 1 for the MSA's for UNE-P the same as they are documented for EEL's?	06/06/2001	
44 5/23/01	Intermedia Sherrie Baughman BellSouth Jim Maziarz	Is the UNE-P non recurring conversion charge the same for all areas? For accounts in the density Zone 1, 2, and 3 MSA's, the charge is \$41.50.	06/06/2001	

UNE-P USER GROUP WORKSHOP ACTION PLAN
Revised As Of May 30,2001

ITEM # DATE REC'D	REC'D FROM & OWNER	WHAT	RESP DUE	STATUS
45 5/23/01	Network Telephone Joann Baxter BellSouth Susan Jones	Will the training center provide an EDI training class?	06/06/2001	



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May 25, 2001

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RE: UNE Platform Provisioning Problems

Dear Ken:

Thanks again for lunch last week. I enjoyed the conversation and share your interest in making the operational processes between our two companies work more effectively and efficiently. During our conversation, I mentioned problems that AT&T was having with UNE Platform orders. Following are the details on the problems we are having.

1. ***BellSouth's use of a "D" and "N" order to provision UNE-P orders is not effective in migrating customers from BellSouth to AT&T.*** Although BellSouth informed the CLEC community during the Louisiana Workshops that a fix was implemented on April 6, 2001, the orders are not relating and the fix has quite obviously not worked. AT&T has several examples of customers' whose service translations have been disconnected when BellSouth works the "D" order, while it fails to work the related "N" order. Attachment 1 will outline the specific information relevant to those customers experiencing a problem. The problem, however, is not unique to AT&T. It is my understanding that Birch Telecom has experienced a similar problem at least 40 times and has presented this information to BellSouth through the user's group process. At the last UNE-P User Group meeting, BellSouth, after much discussion by the CLECs, admitted to a problem with the April solution. Apparently, BellSouth has pulled together a task team to address the issue by generating a "C(hange)" order. However, estimated delivery of this solution was End-of-Year 2001. This is not an acceptable timeframe for a solution.
2. ***BellSouth's linkage between its Provisioning center and processes and its Maintenance center and processes is not effective for UNE-P customers.*** When AT&T has received calls from these customers experiencing problems, our Maintenance Center attempts to refer this to the BellSouth Maintenance

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Center, since these are post-provisioning problems. The BellSouth Maintenance Center personnel are not seeing the migrated customer record and consequently not taking the maintenance ticket. In one instance, an AT&T UNE-P customer, [REDACTED], lost dial tone on Saturday, May 5, 2001. Dial tone was not restored to this customer until Tuesday, May 8, 2001. Attachment 2 to this letter details the difficulty that AT&T experienced relative to this customer's service problem. AT&T received a completion notice on our order. However, it appears that BellSouth only worked the "D" order. I have several questions on this situation, which would apply to all similar UNE-P maintenance issues.

- If the original AT&T due date was May 1, 2001, and AT&T received a completion notice from BellSouth on May 2, 2001, why did the customer not lose service until May 5, 2001?
- Is it the practice of BellSouth to send the completion notice out before all orders are completed within the BellSouth systems?
- On May 5, 2001, at 20:20, Al at BellSouth said that the porting order was cancelled. UNE-P does not port numbers. Was Al perhaps referring to the "N" order?
- Why did BellSouth not handle this as a maintenance issue? The customer was out of service three days. There appears to be nothing that AT&T nor the customer could have done to prevent the out of service condition.
- It was quickly apparent to the BellSouth personnel involved that the problem was caused by BellSouth's failure to process the "N" order. Why was the burden on AT&T to call around to find someone to help solve the problem? Why didn't one of the BellSouth representatives "own" the problem and insure that AT&T got to the right place for resolution? It seems that we lost a vast amount of time due to bouncing around within BellSouth trying to find an organization that could resolve the issue.
- We have many instances of customers who report "No Dial Tone" problems to AT&T after the conversion of their service. Once BellSouth dispatches a service technician, the problem disappears. Since the conversion to UNE-P is, for all intents and purposes, a records order change, why does the customer lose dial tone? What is the technician dispatched to do?
- Are UNE-P customers, who were on IDLC facilities prior to their conversion to AT&T, left on the existing facilities or are they changed to universal or copper facilities before the conversion?

As AT&T's volume of UNE-P orders increases, the number of problems experienced will increase as well, which will have significant impact to our customers and to our brand. I would like to understand BellSouth's action plan and timeline for delivering a remedy to the order relationship issue. I would also like to know what BellSouth plans to implement to treat these types of problems as maintenance problems, with the associated 24-hour resolution, instead of a three-day or more new order problem.

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Ironically, the customer's perception is that the problem must be caused by AT&T, since they did not have similar difficulties when they were provided local service by BellSouth. Because of this perception, they are many times inclined to switch back to BellSouth, where the cause of the problem lies. I will appreciate your response no later than Friday, June 1, 2001.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Terry". The signature is stylized with a large, circular flourish on the left side and a long horizontal stroke extending to the right.

cc: Greg Terry
Jan Burriss

**UNE-P ORDERS WITH
ASSOCIATED TROUBLE TICKETS**

The following PONs are examples of AT&T's experience in BellSouth's ineffective use of a "D" and "N":

AT&T Order Number	Associated BellSouth Order Number
ATLY0101093	N08BDXV8
ATLY0101866	NO2NLJT0
ATLY0101693	N00D34P4
ATLY0101796	N07PVPY7
ATLY0101457	N028RTX4
ATLY0101438	N07Q68B5
ATLY0101927	N01GYFF1
ATLY0101442	N0FYTP11
ATLY0101490	N06MPX94
ATLY0101157	NOCT3VR0
ATLY0101260	N00LRNQ7
ATLY0101297	N0GL8T01

UNE-P TROUBLE TICKET LOG NOTES

NO.	DATE AND TIME	DETAILS
1.	5/5/01 19:58	Ticket created; customer has no dialtone on [REDACTED]; UNE-P connectivity; customer turned up on May 3, 2001
2.	5/5/01 19:58	Ticket saved
3.	5/5/01 19:59	Ticket picked up
4.	5/5/01 20:20	Called BellSouth at 888 461 0612, spoke with Al and he said that the order that was porting the customer to AT&T was cancelled. He gave me order #NR8D54T4. He said that he could not tell when that order was cancelled. He said that he has limited systems to check on the order.
5.	5/5/01 20:24	Unable to refer the trouble to BellSouth. Need the port over order #. Have to talk to MACD or Provisioning on Monday to get the order #.
6.	5/6/01 07:27	Customer wants his service up and working now! I called BellSouth and spoke with Renee at 888 461 0612. She says the system she needs to check our orders is down today but she does see a disconnect of the customer's line on 5/3/01 with no new reconnect. Customer just needs his service working. Will try to get him reconnected through BellSouth. Called BellSouth repair and spoke with Debbie and she said if customer wants back in service with BellSouth he will have to wait until Monday. No provisioning managers on call or available to assist him. The only other thing I can do today is page BellSouth's duty manager at 800 946 4646, PIN #1403974. Will wait and see if they call back before I call the customer.
7.	5/6/01 07:44	Erica Pearson, the weekend duty supervisor, returned call. Said there is nothing they can do until Monday, but she will personally call the provisioning folks and try to get this handled for me. She gave me her direct line # 404 541 4009 to call her on Monday so she can get the right people involved to fix the situation.
8.	5/6/01 7:48	Called customer and explained Monday AM is earliest can get anyone to work with me on this. He accepted that, but still is not happy. I advised we would call him back with update Monday after speaking with BellSouth.
9.	5/7/01 08:31	Called customer's number. Reaching RNA. Called Erica Pearson @ 404 541 4009. She said she would call me right back. Waiting on her callback.
10.	5/7/01 09:52	Erica has not called back, so starting over. Called BellSouth Non-Design Maintenance at 888 461 0612.

UNE-P TROUBLE TICKET LOG NOTES

		Spoke with someone who said records show the "D" order or 5/5/01 and a pending "N" order #NR5FP5W3 to reconnect to AT&T resale, but shows pending in the system. She said to expedite I should call the LCSC. Calling LCSC @ 800 871 4404 and spoke with Catherine. She couldn't locate the order. I gave her our PON and the phone number. She will research and call me back.
11.	5/7/01 09:52	Sharrie calling back from BellSouth with status. Erica called me back. I advised what Non-Design Maintenance said and she advised that she is going to get a Non-Design Maintenance Manager involved in this right away.
12.	5/7/01 09:58	Catherine with the LCSC called. She has been unable to locate any information on this and has forwarded all of the info to the original rep who input the order. She will call me back when she hears something.
13.	5/7/01 10:03	Received callback from Sheree, a manager in Non-Design Maintenance. She has me on hold and is checking into this now. Sheree came back and said she does see the order # still pending in the system and it was never worked. She is putting in a ticket and sending it to a technician at RCMAC to get it worked. She will have tech call me back with status and ticket #.
14.	5/7/01 10:06	Catherine and Steven called from Non-Design Provisioning. I advised what Sheree was doing and they advised they wouldn't handle this anyway so they will let her take care of this.
15.	5/7/01 10:17	Sheree with BellSouth calling back and said the service order needs a new due date. They can't open a new ticket because service order is past due. Order NR5FP5W3, original due date 050101. Said for me to call LCSC.
16.	5/7/01 10:18	Called 800 872 3116 for BellSouth LCSC
17.	5/7/01 10:30	Customer called to request status. Advised he was completely out of service and ask that I escalate.
18.	5/7/01 11:09	Called LCSC at 800 872 3116 and spoke with Alicia. Was on hold for a while, then someone else came online. I must have been transferred. Now speaking with Mary. She found the order but has to transfer me back to someone else. Mary says I need to speak with someone in the UNE Combo for small business group. She transferred me to someone who said she can't talk to CLECs and we are supposed to speak with managers, not them. She said to call back in and speak with someone

[REDACTED]

UNE-P TROUBLE TICKET LOG NOTES

		<p>else. I am trying first level escalation contact listed in KMS, Dan Haley @ 404-532-2072. Only reached his voice mail. I will go back and try this one more time. Called the number listed in KMS for LCSC at 800 871-4404. That is the ACAC center and they cannot help either and didn't know where to send me. I am now trying the 2nd level, Linda Stewart per KMS at 404 532-2118. Her voice mail directs me for order related issues to contact either Elaine at 404 532-2260 or 404 532 2114. Called 404 532 2260 and spoke with someone who handles only AT&T circuits, not POTS lines. Tried 2nd level Reginald Glover 770 493-3471. He also only handled special AT&T circuits and couldn't assist me.</p>
19.	5/7/01 11:38	Called 800 872 3116 and spoke with Terry who put me on hold for a long time. Then the line disconnected.
20.	5/7/01 13:22	Called Orlando provisioning center to get help with this customer order.
21.	5/7/01 16:33	This is being handled by the UNE-P BellSouth resale group. Venice is working it and will escalate to the night manager if not cleared before she leaves at 8:00 PM tonight.
22.	5/8/01 06:30	Received a call from AT&T Provisioning giving me a status. There is a ticket on this and a tech is being dispatched out this morning around 8:30. He will call back with status.
23.	5/8/01 10:25	Received a call from AT&T Provisioning. They have tested the line and it appears to be working.
24.	5/8/01 12:09	Called customer. Confirmed the number has been working since this morning and all is OK.